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13 *Attorneys for Plaintiffs and the Class*

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16

18 MATTHEW CAMPBELL and MICHAEL  
19 HURLEY, on behalf of themselves and all  
others similarly situated,

20 Plaintiffs,

21 v.

22 FACEBOOK, INC.,

23 Defendant.  
24

Case No. C 13-05996 PJH (SK)

**DECLARATION OF DAVID RUDOLPH IN  
SUPPORT OF PLAINTIFFS' MOTIONS  
TO COMPEL DISCOVERY**

Date: Telephonic Hearing to be set  
by Court

Time: To be Set by Court

Judge: Hon. Phyllis J. Hamilton

Place: Courtroom 3, 3rd Floor

1 I, David Rudolph, declare:

2 1. I am a member in good standing of the California State Bar and an partner in the  
3 law firm Lieff, Cabraser, Heimann & Bernstein, LLP, counsel for the plaintiffs in the above-  
4 captioned Action (“Plaintiffs”). I have personal knowledge of the facts set forth herein, and if  
5 called upon to testify thereto, I could and would do so competently.

6 2. I submit this Declaration in support of Plaintiffs’ Motions to Compel Discovery  
7 filed on August 1, 2016; specifically, Plaintiffs’ Motion to Compel Production of Source Code,  
8 Plaintiffs’ Motion to Compel Configuration Tables, and Plaintiffs’ Motion to Compel Production  
9 of Documents.

10 3. A true and correct copy of email correspondence between counsel for the parties,  
11 dated from June 10, 2015 to June 28, 2015, is attached hereto as **Exhibit 1.**

12 4. A true and correct copy of email correspondence between counsel for the parties,  
13 dated from June 24, 2015 to June 25, 2015, is attached hereto as **Exhibit 2.**

14 5. A true and correct copy of Plaintiffs’ First Set of Requests for Production of  
15 Documents to Defendant, and Proof of Service dated January 26, 2015, is attached hereto as  
16 **Exhibit 3.**

17 6. A true and correct copy of Defendant Facebook, Inc.’s Responses and Objections  
18 to Plaintiffs’ First Set of Requests for Production of Documents, and Proof of Service dated  
19 March 9, 2015, is attached hereto as **Exhibit 4.**

20 7. A true and correct copy of excerpts from the February 4, 2016 deposition of  
21 Facebook employee Alex Himel (volume 1) is attached hereto as **Exhibit 5.**

22 8. A true and correct copy of an article entitled, *Why You Shouldn’t Share Links on*  
23 *Facebook*, originally published by Medium, (medium.com) June 8, 2016, and subsequently  
24 published by Quartz (qz.com) on June 29, 2016, (available at [http://qz.com/715019/why-you-](http://qz.com/715019/why-you-shouldnt-share-links-on-facebook/)  
25 [shouldnt-share-links-on-facebook/](http://qz.com/715019/why-you-shouldnt-share-links-on-facebook/)) (last visited August 2, 2016), is attached hereto as **Exhibit 6.**

26 9. A true and correct copy of excerpts from the February 5, 2016 deposition of  
27 Facebook employee Alex Himel (volume 2) is attached hereto as **Exhibit 7.**

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**ATTESTATION**

I, Michael W. Sobol, am the ECF user whose identification and password are being used to file this document. I hereby attest that David Rudolph has concurred in this filing.

DATED: August 2, 2016

/s/ Michael W. Sobol  
Michael W. Sobol