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 FACEBOOK, INC.
 13

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 OAKLAND DIVISION

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

19 Plaintiffs,

20 v.

21 FACEBOOK, INC.,

22 Defendant.

Case No. C 13-05996 PJH (SK)

**DECLARATION OF NIKKI STITT
 SOKOL IN SUPPORT OF PLAINTIFFS’
 ADMINISTRATIVE MOTION TO FILE
 UNDER SEAL RE MOTIONS TO
 COMPEL DISCOVERY**

The Honorable Phyllis J. Hamilton

1 I, Nikki Stitt Sokol, declare as follows:

2 1. I am Associate General Counsel for Litigation for Defendant Facebook, Inc.
3 (“Facebook”). Pursuant to Civil Local Rule 79-5(d) and the Amended Stipulated Protective Order
4 entered by the Court on July 1, 2015 (the “Protective Order”) (Dkt. No. 93), I submit this Declaration
5 in support of Plaintiffs’ Administrative Motion to File Under Seal Re Motions to Compel Discovery
6 (Dkt. 205), which seeks to file under seal (1) designated portions of Plaintiffs’ Motion to Compel
7 Production of Source Code (Dkt. 205-4); (2) designated portions of Plaintiffs’ Motion to Compel
8 Production of Configuration Tables (Dkt. 205-6); (3) designated portions of Plaintiffs’ Motion to
9 Compel Production of Documents (Dkt. 205-8); (4) designated portions of the August 1, 2016
10 Declaration of Dr. Jennifer Golbeck in Support of Plaintiffs’ Motion to Compel Production of
11 Configuration Tables (“August 1, 2016 Golbeck Declaration”) (Dkt. 205-10); (5) designated portions
12 of Exhibits 1 and 11 to the Declaration of David T. Rudolph in Support of Plaintiffs’ Motions to
13 Compel Discovery (“Rudolph Declaration”) (Dkt. 205-12 and 205-14); and (6) Exhibits 5, 7-10, and
14 12 to the Rudolph Declaration (Dkt. 205-16 through 205-21), in their entirety. Except as otherwise
15 noted, I have personal knowledge of the facts set forth in this Declaration and, if called and sworn as
16 a witness, could and would testify competently to them.

17 2. Facebook respectfully requests that the Court allow the below-referenced documents
18 (or relevant portions of those documents) to be filed under seal due to their confidential nature. As
19 discussed with particularity below, the documents contain non-public, confidential, and proprietary
20 Facebook business information that is protectable as a trade secret or otherwise entitled to protection
21 under the law, including information concerning the names of and the nature of the content stored in
22 Facebook’s internal databases; the names of internal tables in Facebook’s databases; the processes
23 and functionality of Facebook’s confidential security and anti-abuse products and systems;
24 information about Facebook’s internal document repositories, which demonstrate how Facebook’s
25 systems and tools work; and Facebook’s proprietary source code.

26 3. I respectfully request that Facebook’s requests to seal or not to seal the below-
27 referenced documents (or relevant portions of those documents) should not be construed as an
28

1 admission that the information marked for redaction by Plaintiffs is accurate. Plaintiffs’ motions and
2 accompanying documents contain a number of misstatements and mischaracterizations of documents
3 in and outside of the record. Nothing in my Declaration constitutes an admission of any allegation
4 marked for redaction by Plaintiffs.

5 4. I also respectfully submit that the presumption of access to judicial records does not
6 apply here because the documents at issue are being filed in connection with non-dispositive
7 discovery motions, and the Ninth Circuit has “carved out an exception to the presumption of access to
8 judicial records . . . [that is] expressly limited to judicial records filed under seal when attached to a
9 *non-dispositive* motion.” *In re Midland Nat’l Life Ins. Co. Annuity Sales Practices Litig.*, 686 F.3d
10 1115, 1119 (9th Cir. 2012) (per curiam) (internal quotation marks and citation omitted) (emphasis in
11 original); *Real Action Paintball, Inc. v. Advanced Tactical Ordnance Sys., LLC*, No. 14-CV-02435-
12 MEJ, 2015 WL 1534049, at *2 (N.D. Cal. Apr. 2, 2015) (the presumption of public access to judicial
13 documents in connection with dispositive motions “does not apply in the same way to non-dispositive
14 motions”). Accordingly, the appropriate legal standard is “good cause,” which Facebook respectfully
15 submits is satisfied. *Kamakana v. City and County of Honolulu*, 447 F.3d 1172, 1180 (9th Cir. 2006)
16 (“A ‘good cause’ showing will suffice to seal documents produced in discovery. Fed. R. Civ. P.
17 26(c) (stating that if ‘good cause’ is shown in discovery, a district court may issue ‘any order which
18 justice requires to protect a party or person from annoyance, embarrassment, oppression, or undue
19 burden or expense’).”). A party shows good cause when, for example, public disclosure of the
20 materials would put the party at a competitive disadvantage. *See, e.g., Oracle USA, Inc. v. SAP AG*,
21 No. 07-cv-01658 PJH, 2009 U.S. Dist. LEXIS 71365, at *4-5 (N.D. Cal. Aug. 12, 2009) (granting
22 motion to seal where moving party “considered and treated the information contained in the subject
23 documents as confidential, commercially sensitive and proprietary” and where “public disclosure of
24 such information would create a risk of significant competitive injury and particularized harm and
25 prejudice”).

26 5. For the Court’s convenience, to the extent possible I discuss the documents by
27 category below.

1 **Plaintiffs’ Motion to Compel Production of Source Code**

2 6. Good cause exists to seal portions of Plaintiffs’ Motion to Compel Production of
3 Source Code (Dkt. 205-4) for the reasons identified below.

Sealable Portions	Reason for Confidentiality
6:2-3; fn. 12 at 6:23-24; 7:2; 7:4; fn. 16 at 7:24; 9:4-5; fn. 26 at 9:25-26	The information redacted by Plaintiffs does not need to be sealed.
6:22; 9:22	<p>The information redacted by Plaintiffs reflects the name of an internal table in Facebook’s databases, which contains (or may have contained) sensitive data and constitutes non-public, confidential, and proprietary Facebook business information that is protectable as a trade secret. Pursuant to the Court’s previous order, “names of internal tables in Facebook’s databases” are “properly sealable.” (Dkt. 193.)</p> <p>As I described in my previous Declaration (Dkt. 181-2), this information constitutes a trade secret because it could be used by individuals or companies that might seek to compromise the security of Facebook’s messages and other technology, causing significant harm to Facebook and the people who use Facebook’s services. Internal table names—and the databases in which they exist—are referenced within Facebook’s proprietary source code and indicate both the schema for Facebook’s internal databases (i.e., how they are structured) and—more importantly—where particular data or types of data are (or were) stored. Facebook and its user base present an attractive target for criminals and others with malicious intentions. Accordingly, revealing table names could provide a roadmap that would assist an unauthorized individual who illicitly obtained access to Facebook’s internal systems in determining where sensitive data—including user information—is (or was) stored, how it is (or was) stored, and how to access it. Limiting access to user data and respecting the privacy and sensitivity of such data are extremely important and of paramount importance within Facebook, as well as to the public. Accordingly, the public does not have a meaningful interest in obtaining such information. Moreover, the public disclosure of this information also would cause particularized harm to Facebook by allowing its competitors to access the details of Facebook’s internal tools, which they could use to gain an unfair advantage against Facebook.</p>
fn. 14 at 6:25-27	<p>Only the text between “including data from the” and “table”; the text between “admitting” and “informed ‘Recommendations Feed’”; and the text between “discussing” and “and scribeh_share_stats logging” needs to be sealed.</p> <p>This information reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i></p>

Sealable Portions	Reason for Confidentiality
	Dkt. 193.)
7:3	Only the text between “that the” and “was” needs to be sealed. This information reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)

Plaintiffs’ Motion to Compel Production of Configuration Tables

7. Good cause exists to seal portions of Plaintiffs’ Motion to Compel Production of Configuration Tables (Dkt. 205-6) for the reasons identified below.

Sealable Portions	Reason for Confidentiality
5:13; 5:14; 5:15; 5:19; 6:1; 7:21; 8:5-6; 8:8; 8:15; 8:16; 8:19	The information redacted by Plaintiffs does not need to be sealed.
1:14-15; 1:19, 1:22; 3:13-14; 3:22; fn. 8 at 3:26-27; 4:1-2; 4:6-8; 5:8-11; 5:12; 5:20; fn. 16 at 5: 25; fn. 17 at 5:27; 6:4-6; 6:8; 6:10-11; 6:14; 6:16- 17; fn. 21 at 6: 23-24; 7:15; 8:4; 8:9; 8:10, 8:11; 8:19; fn. 31 at 8:27; fn. 32 at 9:26	The information redacted by Plaintiffs reflects the names of and the nature of the content stored in Facebook’s internal databases and/or the names of internal tables in those databases, which contain (or may have contained) sensitive data and constitute non-public, confidential, and proprietary Facebook business information that is protectable as a trade secret. Again, pursuant to the Court’s previous order, “names of internal tables in Facebook’s databases” are “properly sealable.” (Dkt. 193.) As I described in my previous Declaration (Dkt. 181-2), and as described above, this information constitutes a trade secret because it could be used by individuals or companies that might seek to compromise the security of Facebook’s messages and other technology, causing significant harm to Facebook and the people who use Facebook’s services. The internal table names—and the databases in which they exist—are referenced within Facebook’s proprietary source code and indicate both the schema for Facebook’s internal databases (i.e., how they are structured) and—more importantly—where particular data or types of data are (or were) stored. Facebook and its user base present an attractive target for criminals and others with malicious intentions. Accordingly, revealing the database names, database contents, and table names could provide a roadmap that would assist an unauthorized individual who illicitly obtained access to Facebook’s internal systems in determining where sensitive data—including user information—is (or was) stored, how it is (or was) stored, and how to access it. Limiting access to user data and respecting the privacy and sensitivity of such data are extremely important and of paramount importance within Facebook, as well as to the public. Accordingly, the public does not have a meaningful interest in obtaining such information. Moreover, the public disclosure of this information also would cause particularized harm to Facebook by allowing its competitors to access the details of Facebook’s internal tools, which they could use to

Sealable Portions	Reason for Confidentiality
	gain an unfair advantage against Facebook.
fn. 8 at 3:27	<p>Only the text between “discussing” and “and scribeh_share_stats logging” needs to be sealed.</p> <p>This information reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>
5:17	<p>Only the text before “Hive table was used” needs to be sealed.</p> <p>This information reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>
fn. 16 at 5:25	<p>Only the text between “in a table” and “in its Hive database” needs to be sealed.</p> <p>This information reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>
fn. 18 at 5:27	<p>Only the text between “The [” and “Hive]” needs to be sealed.</p> <p>This information reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>
fn. 20 at 6: 21	<p>Only the text between “related to the” and “Hive table” needs to be sealed.</p> <p>This information reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>
7:17-20	<p>The information redacted by Plaintiffs reflects deposition testimony related to the nature of the content stored in Facebook’s internal databases and is properly sealable for the reasons indicated above.</p> <p>However, only the text between “the source code Facebook produced” and “configuration data that” needs to be sealed.</p>
8:17	<p>The information redacted by Plaintiffs reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p> <p>However, only the text between “content, and the” and “Hive table” needs to be sealed.</p>
4:7-8; 4:11; 4:12-13; fn. 12 at 4:25-26	<p>This information contains non-public, confidential, and proprietary Facebook business information that is protectable as a trade secret, as it concerns the processes and functionality of Facebook’s confidential security and anti-abuse products and systems. Pursuant to the Court’s previous order, “information regarding the processes and functionality of Facebook’s security and anti-abuse products and systems,” is “properly</p>

Sealable Portions	Reason for Confidentiality
	<p>sealable.” (Dkt. 193.)</p> <p>As I described in my previous Declaration (Dkt. 181-2), Facebook’s main priority is ensuring that the people who use Facebook are protected and that their accounts are secure. The redacted information could be used by individuals or companies that might seek to compromise the security of Facebook’s messages and other technology, causing harm to Facebook and the people who use Facebook’s services. Facebook and its user base present an attractive target for hackers and other criminals. <i>See, e.g.</i>, Ellis Hamburger, “Inside Facebook Security: Defending Users from Spammers, Hackers, and ‘Likejackers,’” <i>The Verge</i> (May 25, 2012), <i>available at</i> http://www.theverge.com/2012/5/25/2996321/inside-facebook-likejackers-spammers-hackers. Indeed, as Facebook has previously explained in public-facing materials, Facebook does not (and cannot) share all of the specific details of how its security, spam, and abuse-prevention systems operate, because this information could help provide a roadmap to hackers and others who seek to harm Facebook and people who use the service. Specifically, this information could help wrongdoers build and implement “workarounds” designed to thwart safety mechanisms. The public does not have a meaningful interest in obtaining information that could compromise the security of user accounts. Further, the public disclosure of this information would cause particularized harm to Facebook by allowing its competitors to access the specifics of Facebook’s business, which they could use to gain an unfair advantage against Facebook.</p>

Plaintiffs’ Motion to Compel Production of Documents

8. Good cause exists to seal portions of Plaintiffs’ Motion to Compel Production of Documents (Dkt. 205-8) for the reasons identified below.

Sealable Portions	Reason for Confidentiality
fn. 2 at 1:27; 2:26; 4:8-9; 4:11-16; fn. 12 at 5:24; 6:5; 6:12-13; 7:6-11; 8:3-4; 8:8; 8:15; fn. 29 at 8:21-22; fn. 30 at 8:22-28	The information redacted by Plaintiffs does not need to be sealed.
fn. 10 at 5:22-23	<p>Only the text between “[link stats],” and “and scribeh_share_stats” needs to be sealed.</p> <p>This information reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>
fn. 11 at 5:23	Only the text between “Relevant terms include:” and “Taste” needs to be sealed.

Sealable Portions	Reason for Confidentiality
	<p>This information reflects non-public, confidential, and proprietary Facebook source code that is protectable as a trade secret. Pursuant to the Court’s previous order, Facebook’s source code is “properly sealable.” (<i>See</i> Dkt. 193.)</p> <p>As I described in my previous Declaration (Dkt. 181-2), Facebook’s source code is a valuable trade secret, given that Facebook has invested millions of dollars in conjunction with the development of this code, including by providing it with the highest level of protection and security within Facebook. Most importantly, this information relates to code utilizing information about user activity on Facebook and could be used by individuals or companies that might seek to compromise the security of that information and technology, causing harm to Facebook and the people who use Facebook’s services. The public does not have a meaningful interest in obtaining such information. The public disclosure of this information would cause particularized harm to Facebook by allowing its competitors to access Facebook’s source code, which they could use to gain an unfair advantage against Facebook.</p>
fn. 13 at 5:25-26	<p>Only the text between “Insights logging” and “and Realtime Metric” needs to be sealed.</p> <p>This information reflects non-public, confidential, and proprietary Facebook source code and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>
6:6	<p>Only the text that precedes “table, and the ‘scribeh_share_stats’ log” needs to be sealed.</p> <p>This information reflects the names of internal tables in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>
6:9	<p>Only the text between “Similarly, the” and “table and” needs to be sealed.</p> <p>This information reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>
6:17-18	<p>Only the text between “identified (1)” and “and (3) ‘Taste’” needs to be sealed.</p> <p>The information redacted by Plaintiffs reflects non-public, confidential, and proprietary Facebook source code functionality and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>
7:3-5	<p>Only the text between “‘Insights logging’” and the reference to footnote 24 needs to be sealed.</p> <p>This information reflects non-public, confidential, and proprietary Facebook source code functionality and is properly sealable for the reasons</p>

Sealable Portions	Reason for Confidentiality
fn. 28 at 8:17-20	<p>indicated above. (<i>See</i> Dkt. 193.)</p> <p>Only the text between “link stat” and “FB000000659”; and “FB000001206 (discussing” and “share_count” needs to be sealed.</p> <p>This information reflects the name of internal tables in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>
fn. 32 at 9:26	<p>Only the text between “assertion that the” and “Hive table” needs to be sealed.</p> <p>This information reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>
10:5; fn. 25 at 10:25; fn. 36 at 10:27-28	<p>The information redacted by Plaintiffs reflects information regarding Facebook’s internal document repositories, which contain non-public, confidential, and proprietary information about Facebook’s internal systems that is protectable as a trade secret.</p> <p>This information in these repositories effectively demonstrates how Facebook’s internal systems and tools work—and as Facebook has previously explained in public-facing materials, Facebook does not (and cannot) share the specific details of the names of internal systems or how they operate, because this information could help provide a roadmap to hackers and others who seek to harm Facebook and people who use the service. The public does not have a meaningful interest in obtaining such information. Further, the public disclosure of this information would cause particularized harm to Facebook by allowing its competitors to access the specifics of Facebook’s business, which they could use to gain an unfair advantage against Facebook.</p>
10:12-15	<p>Only the text between “stated that he would” and the reference to footnote 35 needs to be sealed.</p> <p>This information reflects deposition testimony regarding how to navigate Facebook’s internal document repositories, which is properly sealable for the reasons indicated above.</p>
Search terms contained in table in Appendix A	<p>Only the following terms need to be sealed:</p> <ul style="list-style-type: none"> • The terms that are redacted in the “Term” column at pages A-2:7-8; A-2:19-20; A-3:5-6; A-3:13-14; and A-6:21-22, and which also appear elsewhere in the chart, reflect non-public, confidential, and proprietary Facebook source code functionality and are properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.) • The terms that are redacted at page A-4:16, 21-22, 23, 24-25, and which also appear elsewhere in the chart, reflect information regarding Facebook’s internal document repositories and are properly sealable for the reasons indicated above.

Sealable Portions	Reason for Confidentiality
	<ul style="list-style-type: none"> The term that is redacted in the “Term” column at page A-9:3, and which also appears elsewhere in the chart, reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)

August 1, 2016 Golbeck Declaration

9. Good cause exists to seal portions of the August 1, 2016 Golbeck Declaration (Dkt. 205-10) for the reasons identified below.

Sealable Portions	Reason for Confidentiality
5:16-17; 5:20	The information redacted by Plaintiffs does not need to be sealed.
5:9; 5:11-13; 5:21; 5:23; 5:27; 6:1-2; 6:7	The information redacted by Plaintiffs reflects the names of and the nature of the content stored in Facebook’s internal databases and/or the names of internal tables in those databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)
5:14-15	Only the text between “production of the” and “table” needs to be sealed. This information reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)
5:17-18	Only the text between “into the” and “table with the same” needs to be sealed. This information reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)
5:19	Only the text before “table, and may also lead to” needs to be sealed. This information reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)
6:14-17	Only the text before “appear to be configuration tables” needs to be sealed. This information reflects the name of internal tables in Facebook’s databases and the name of a Facebook internal database and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)
6:21-23	Only the text before “and I have seen many references” needs to be sealed. This information reflects the nature of the content stored in Facebook’s internal databases and is properly sealable for the reasons indicated above.
6:24-26	Only the text between “in the use of the” and “to configure”; the text between “the operation of” and “checks”; and “checks” and “is run” needs to be sealed. This information concerns the processes and functionality of Facebook’s confidential security and anti-abuse products and systems and is properly

Sealable Portions	Reason for Confidentiality
	sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)
6:27-28	<p>Only the text between “as part of the” and “system” and “go in to the” and “system” needs to be sealed.</p> <p>This information concerns the processes and functionality of Facebook’s confidential security and anti-abuse products and systems and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>
7:2	<p>Only the text between following “that define the next steps within” needs to be sealed.</p> <p>This information concerns the processes and functionality of Facebook’s confidential security and anti-abuse products and systems and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>

Exhibits 1 and 11 to the Rudolph Declaration

10. Good cause exists to seal portions of Exhibits 1 and 11 to the Rudolph Declaration (Dkt. 205-12 and 205-14) for the reasons identified below.

Sealable Portions	Reason for Confidentiality
Exhibit 1 (Search terms contained in tables in pp 1-20)	<p>Only the following terms need to be sealed:</p> <ul style="list-style-type: none"> • The terms that are redacted in the “Term” column on pages 2 (Row 5); 3 (Row 1); 3 (Row 2); 3 (Row 3); and 6 (Row 2), and which also appear elsewhere in the charts, reflect non-public, confidential, and proprietary Facebook source code functionality and are properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.) • The terms that are redacted in the “Plaintiffs’ Counter-Proposal of Additional Limiting Terms” column at page 4 (row 2), and which also appear elsewhere in the charts, reflect information regarding Facebook’s internal document repositories and are properly sealable for the reasons indicated above. • The terms that are redacted in the “Term” column on page 8 (Row 1); 8 (Row 3, in the parenthetical following “Nectar-related terms”), and which also appear elsewhere in the charts, reflect the names of internal tables in Facebook’s databases and are properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.) <p>The remainder of the terms redacted by Plaintiffs do not need to be sealed:</p> <ul style="list-style-type: none"> • Titan • share_count • link_stats • link_stats • Insights (UI) • scribeh_share_stats • tracking_info

Sealable Portions	Reason for Confidentiality
	<ul style="list-style-type: none"> • Taste • SharePro • Hbase • Targeting roadmap • Realtime • Realtime Metric • Real Time Analytics • Targeting team • Sharescapper • Sharescraper • Interaction Data • node • entity • entities • stats • Insights logging • Insights API • Nectar
Exhibit 11 (Search terms contained in table in Appendix)	<p>Only the term that appears on Rows 13 and 14 between “‘share count’ or” and “and ‘message!’” needs to be redacted.</p> <p>This information reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)</p>

Exhibits 5, 7-10, and 12 to the Rudolph Declaration

11. Good cause exists to seal Exhibits 5, 7-8, 10, and 12 to the Rudolph Declaration (or relevant portions of those documents) for the reasons articulated below. Exhibit 9 (excerpts of the transcript of the September 30, 2015 deposition of Mike Vernal) does not need to be sealed.

Document	Sealable Portions	Reason for Confidentiality
Exhibit 5 (excerpts of the transcript of the February 4, 2016 deposition of Alex Himel)	202:10-208:15	This information reflects the names of and the nature of the content stored in Facebook’s internal databases and/or the names of internal tables in those databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)
	247:15-249:4; 253:10-257:25	This information concerns the existence of and content in Facebook’s internal document repositories, which is properly sealable for the reasons indicated above.
Exhibit 7 (excerpts of the transcript of the	372:1-21; 374:11- 375:9	This information reflects the names of and the nature of the content stored in Facebook’s internal databases and/or the names of internal tables in those databases

Document	Sealable Portions	Reason for Confidentiality
February 5, 2016 30(b)(6) deposition of Facebook (Alex Himel))		and is properly sealable for the reasons indicated above. (See Dkt. 193.)
Exhibit 8 (excerpts of the transcript of the September 25, 2015 deposition of Ray He)	270:3 (following "My user ID is")	This information reflects the Facebook user ID of a Facebook employee. (See Dkt. 193.)
Exhibit 10 (excerpts of the transcript of the October 28, 2015 30(b)(b) Deposition of Facebook (Michael Adkins))	This document should be sealed in its entirety	This information concerns the processes and functionality of Facebook's confidential security and anti-abuse products and systems and is properly sealable for the reasons indicated above. (See Dkt. 193.)
Exhibit 12 (FB000008271)	Only Facebook employees' email addresses need to be sealed, as is reflected in the version of Exhibit 12 filed at Dkt. 199-15	Pursuant to the discussion at the hearing on Plaintiffs' Motion for Class Certification held on March 16, 2016, this Court indicated that it would "permit the sealing" of "the addresses and phone numbers of anyone, whether or not they are a party to the lawsuit." (See Dkt. 177 at 105:9-13; see also Dkt. 193.)

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct, and that I executed this Declaration in Menlo Park, California on August 5, 2016.

/s/ Nikki Stitt Sokol
Nikki Stitt Sokol

1 **ATTORNEY ATTESTATION**

2 I, Christopher Chorba, attest that concurrence in the filing of this Declaration of Nikki Stitt
3 Sokol has been obtained from the signatory. I declare under penalty of perjury under the laws of the
4 United States of America that the foregoing is true and correct. Executed this 8th day of August 2016,
5 in Los Angeles, California.

6
7 Dated: August 8, 2016

8 */s/ Christopher Chorba*
9 Christopher Chorba