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 FACEBOOK, INC.

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

17 MATTHEW CAMPBELL and MICHAEL
 HURLEY,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC.,

21 Defendant.

Case No. C 13-05996 PJH (SK)

**DECLARATION OF NIKKI STITT
 SOKOL IN SUPPORT OF DEFENDANT
 FACEBOOK, INC.'S ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS IN
 SUPPORT OF ITS OPPOSITIONS TO
 PLAINTIFFS' MOTIONS TO COMPEL
 UNDER SEAL**

No Hearing Unless Requested By Court (Dkt.
 203)

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. 93), I submit this Declaration in
5 support of Facebook’s Administrative Motion to File Documents In Support of Its Oppositions to
6 Plaintiffs’ Motions to Compel Under Seal (“Motion to Seal”). Except as otherwise noted, I have
7 personal knowledge of the facts set forth in this Declaration and, if called and sworn as a witness,
8 could and would testify competently to them.

9 2. The Motion to Seal sets forth the documents sought to be sealed, including the
10 following:

11 (1) designated portions of Facebook’s Opposition to Plaintiffs’ Motion to Compel Production
12 of Source Code;

13 (2) designated portions of Facebook’s Opposition to Plaintiffs’ Motion to Compel Production
14 of “Configuration Tables”;

15 (3) designated portions of the Declaration of Neal Poole in Support of Defendant Facebook,
16 Inc.’s Opposition to Plaintiffs’ Motion to Compel Production of “Configuration Tables” (“Poole
17 Declaration”);

18 (4) designated portions of Facebook’s Opposition to Plaintiffs’ Motion to Compel Production
19 of Documents; and

20 (5) designated portions of the Declaration of Jeana Bisnar Maute in Support of Defendant
21 Facebook, Inc.’s Opposition to Plaintiffs’ Motion to Compel Production of Documents (“Maute
22 Declaration”).

23 3. For the Court’s convenience, to the extent possible I discuss the documents by
24 category below.

25 **Facebook’s Opposition to Plaintiffs’ Motion to Compel Production of Source Code**

26 4. Good cause exists to seal portions of Facebook’s Opposition to Plaintiffs’ Motion to
27 Compel Production of Source Code (Exhibit 1 to the Motion to Seal) for the reasons identified below.
28

Sealable Portions	Reason for Confidentiality
fn. 4 at 8:24-27	<p>This information 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 Declarations (Dkt. 181-2 and 211) 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>

Facebook’s Opposition to Plaintiffs’ Motion to Compel Production of “Configuration Tables”

5. Good cause exists to seal portions of Facebook’s Opposition to Plaintiffs’ Motion to Compel Production of “Configuration Tables” (Exhibit 3 to the Motion to Seal) for the reasons identified below.

Sealable Portions	Reason for Confidentiality
3:20-21; 3:22-24; 6:12; 6:16; 6:18; 6:19; 7:3; fn. 4 at 7:25-26; 8:7; 8:12; 8:14; 9:14	This information reflects the names of Facebook’s internal databases and the names of tables within those databases and is properly sealable for the reasons indicated above. (<i>See</i> Dkt. 193.)
6:22-23; 6:25; 7:1-2	This information reflects the names of and the nature of the content stored in one of Facebook’s internal databases and the internal tables in that database. Facebook’s databases and tables contain (or may have contained) sensitive

Sealable Portions	Reason for Confidentiality
	<p>data and constitute non-public, confidential, and proprietary Facebook business information that is protectable as a trade secret. As noted above, 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 Declarations (Dkt. 181-2 and 211) 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. Additionally, revealing the nature of the data that is stored together in Facebook’s databases and tables could also provide an unauthorized individual who illicitly obtained access to Facebook’s internal systems with information on how to locate and exploit sensitive data. 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. 4 at 7:24	<p>This information contains non-public, confidential, and proprietary Facebook business information that is protectable as a trade secret, as it reflects the name of one of Facebook’s confidential security and anti-abuse 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 sealable.” (Dkt. 193.)</p> <p>As I described in my previous Declarations (Dkt. 181-2 and 211), 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-</p>

Sealable Portions	Reason for Confidentiality
	<p>spammers-hackers. Indeed, as Facebook has previously explained in public-facing materials, Facebook does not (and cannot) share the names of or 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>
Appendix A— “Table” Column	This information reflects the names of internal tables in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See Dkt. 193.</i>)
Appendix A— “Scope” Column	This information reflects the nature of the content stored in the internal tables in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See Dkt. 193.</i>)
Appendix A— “Data Size” Column	This information reflects the precise volume of the content stored in the internal tables in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See Dkt. 193.</i>)
Appendix A— “Plaintiffs’ Purported ‘Need’” Column	<p>The information in Row 1 and Row 3, line 1 reflects the name of an internal table in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See Dkt. 193.</i>)</p> <p>The information in Row 3 reflects the name of one of Facebook’s confidential security and anti-abuse systems and is properly sealable for the reasons indicated above. (<i>See Dkt. 193.</i>)</p>
Appendix A— “Facebook’s Responses” Column	This information reflects the names of internal tables in Facebook’s databases and is properly sealable for the reasons indicated above. (<i>See Dkt. 193.</i>)

Poole Declaration

6. Good cause exists to seal portions of the Poole Declaration (Exhibit 5 to the Motion to Seal) for the reasons identified below.

Sealable Portions	Reason for Confidentiality
1:16-17; 2:16-17; 2:20-21; 3:10-12; 3:15; 3:27-4:14; 4:23-5:25	This information reflects the names of and the nature of the content stored in Facebook’s internal databases and the internal tables in those databases and is properly sealable for the reasons indicated above. (<i>See Dkt. 193.</i>)

1 **Facebook’s Opposition to Plaintiffs’ Motion to Compel Production of Documents**

2 7. Good cause exists to seal portions of Facebook’s Opposition to Plaintiffs’ Motion to
3 Compel Production of Documents (Exhibit 7 to the Motion to Seal) for the reasons identified below.

4

Sealable Portions	Reason for Confidentiality
5:25; 8:27-28; 9:3-4; 9:6-9; 9:10-11	This information reflects the names and functionality of 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. As I described in my previous Declaration (Dkt. 211), the information in Facebook’s internal 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.

14
15 **Maute Declaration**

16 8. Good cause exists to seal portions of the Maute Declaration (Exhibit 9 to the Motion
17 to Seal) for the reasons identified below.

18

Sealable Portions	Reason for Confidentiality
1:14-18; 1:25-28; 2:1-5; 2:9-11; 2:17-23	This information reflects the names and functionality of Facebook’s internal document repositories and is properly sealable for the reasons indicated above.

21 I declare under penalty of perjury under the laws of the United States of America and the
22 State of California that the foregoing is true and correct, and that I executed this Declaration in Menlo
23 Park, California on August 19, 2016.

24 _____
25 */s/ Nikki Stitt Sokol*
26 Nikki Stitt Sokol

1 **ATTORNEY ATTESTATION**

2 I, Joshua A. Jessen, attest that concurrence in the filing of this Declaration of Nikki Stitt Sokol
3 has been obtained from the signatory. I declare under penalty of perjury under the laws of the United
4 States of America that the foregoing is true and correct. Executed this 19th day of August 2016, in
5 Irvine, California.

6
7 Dated: August 19, 2016

8 */s/ Joshua A. Jessen*
9 Joshua A. Jessen