

# Exhibit 10

REDACTED VERSION OF DOCUMENT(S)  
SOUGHT TO BE SEALED

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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,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC.,

21 Defendant.  
22

Case No. C 13-05996 PJH (SK)

**DECLARATION OF JEANA BISNAR  
MAUTE IN SUPPORT OF DEFENDANT  
FACEBOOK, INC.'S OPPOSITION TO  
PLAINTIFFS' MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS**

1 I, Jeana Bisnar Maute, declare as follows:

2 1. I am an attorney admitted to practice law before this Court. I am an associate in the  
3 law firm of Gibson, Dunn & Crutcher LLP, and I am one of the attorneys responsible for representing  
4 Defendant Facebook, Inc. (“Facebook”) in the above-captioned action. I submit this declaration in  
5 support of Facebook’s Opposition to Plaintiffs’ Motion to Compel Production of Documents (Dkt.  
6 208; the “Motion”). The following facts are within my personal knowledge or based on the  
7 knowledge I have acquired by working with Facebook personnel to provide discovery and produce  
8 documents in this matter and, if called and sworn as a witness, I could and would testify competently  
9 to these facts.

10 2. Plaintiffs in this case are requesting that Facebook use a set of specific searches in  
11 order to extract documents from Facebook’s system for review and production in this lawsuit. These  
12 searches require that a document contain one or more enumerated words within 50 words of one or  
13 more other enumerated words in order to be responsive to the search (i.e., “proximity searching”).

14 3. Facebook’s systems for [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]. Facebook has undertaken  
19 this process for Plaintiffs’ proposed searches. Plaintiffs’ proposed searches as applied to the email  
20 collections of the individual custodians alone returned almost 100,000 unique documents. Discovery  
21 vendor costs for Facebook to merely collect, process, and search these documents has already risen to  
22 approximately \$50,000. Based on historical costs for review of documents in this case, it would  
23 likely cost Facebook several hundred thousand additional dollars to complete review of and  
24 production from these search results.

25 4. With respect to non-individual custodians, [REDACTED]  
26 [REDACTED] systems (among other things) in the  
27 form of [REDACTED]. The search functionality includes [REDACTED]  
28 [REDACTED]

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]

5 [REDACTED]. A search in this system for the word “EntShare” alone  
6 returned over 10,000 results. Manually viewing and printing each of these page results would be  
7 extremely burdensome. Even if that process were undertaken, those documents would still need to be  
8 moved to another system for processing and proximity searching.

9 5. Facebook’s “[REDACTED]” system, [REDACTED]  
10 [REDACTED].  
11 Therefore, searches in the “[REDACTED]” system would be duplicative of searches in Facebook’s email  
12 system.

13 6. When Facebook exports documents to a review platform for purposes of litigation,  
14 documents will sometimes have no individual “custodian” metadata information, and Facebook may  
15 apply “Facebook,” or “Facebook Email,” or “Facebook Temp” or some other generic custodian  
16 information in the “custodian” metadata field.

17 7. Facebook possesses [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]

23 [REDACTED]. Manually and individually locating and converting each page would be extremely  
24 burdensome.

25 //  
26 //  
27 //  
28 //

1 I declare under penalty of perjury under the laws of the United States of America that  
2 the foregoing is true and correct and that this declaration was executed on August 19, 2016 in  
3 Palo Alto, California.

4 /s/ Jeana Bisnar Maute

5 Jeana Bisnar Maute

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**ATTORNEY ATTESTATION**

1 I, Joshua A. Jessen, attest that concurrence in the filing of this Declaration of Jeana Bisnar  
2 Maute has been obtained from the signatory. I declare under penalty of perjury under the laws of the  
3 United States of America that the foregoing is true and correct. Executed this 19<sup>th</sup> day of August  
4 2016, in Irvine, California.

5  
6 Dated: August 19, 2016

\_\_\_\_\_  
*/s/ Joshua A. Jessen*  
Joshua A. Jessen