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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 NEAL POOLE IN
 SUPPORT OF DEFENDANT
 FACEBOOK, INC.'S OPPOSITION TO
 PLAINTIFFS' MOTION TO COMPEL
 PRODUCTION OF "CONFIGURATION
 TABLES"**

1 I, Neal Poole, declare as follows:

2 1. I am an employee of Defendant Facebook, Inc. (“Facebook”). My job title is Security
3 Engineer. My duties include investigating potential security risks that impact Facebook and its
4 infrastructure, assessing our overall architecture and the architecture of individual products from a
5 security perspective, and performing various security assessments on existing and newly developed
6 products. These duties require use of Facebook’s configuration information. I submit this
7 Declaration in support of Facebook’s Opposition to Plaintiffs’ Motion to Compel Production of
8 “Configuration Tables.” Unless otherwise indicated, I have personal knowledge of the facts stated
9 below and could competently testify to them. I provide this Declaration to explain certain facts
10 regarding Facebook’s internal databases and certain tables identified by Plaintiffs in their Motion.

11 2. Through their Motion, Plaintiffs seek a court order compelling Facebook to produce
12 “all configuration tables for all databases that contain data derived from Private Message URL
13 content including, but not limited to, the three categories of configuration tables specified [below], to
14 be produced as a text file dump within two weeks of the entry of an Order on this motion.” (Mot.
15 (Dkt. 207) at 10.) The three specific “categories of configuration tables” that Plaintiffs request are
16 those related to the following databases and systems (a) “██████████ “Hive,” “Scribe” and “HBase,”
17 (b) “██████████ and (c) “██████████ (*Id.* at 1.)

18 3. I understand that Plaintiffs are challenging four practices in this case (the “challenged
19 practices”): the creation of certain “EntShares”—the storage of the URL preview feature—as well as
20 three alleged and historical “uses” of that information: (1) the counter next to the “Like” button social
21 plugin, (2) “recommendations for other users” in Facebook’s Recommendation Feed plugin, and
22 (3) the “sharing of user data with third parties” through Facebook’s “Insights” product. (Dkt. 192 at
23 3-5.)

24 4. I am not aware of any “configuration tables” at Facebook as Plaintiffs describe them—
25 that is, tables of configuration information related to the challenged practices as they relate to URLs
26 in messages for each of the databases that Plaintiffs identify. Additionally, the tables that Plaintiffs
27 have specifically requested by name are extremely large and filled with sensitive information
28 regarding all of Facebook’s system. Moreover, several of the tables do not contain configuration data

1 at all. And critically, these tables do not contain data that are limited to the four practices challenged
2 in this case. In fact, several of them may have no information relevant to URLs in messages, and the
3 others contain little if anything relevant to URLs in messages.

4 **There Are No “Configuration Tables” For URLs In Messages**

5 5. As an initial matter, Plaintiffs’ Motion seeks to compel the production of things that
6 simply do not exist for the challenged practices. Specifically, Plaintiffs define “configuration tables”
7 as follows:

- 8 • “Each database contains configuration tables which show what kind of data resides on the
9 database, how that data is organized, and how Facebook uses that data.” (Dkt. 207 at 2.)
- 10 • “[T]he programming contained in configuration tables [] reveals how Facebook uses the
11 data after it is redirected to databases.” (*Id.* at 3.)
- 12 • “The configuration tables Plaintiffs seek not only provide information about the structure
13 of the databases (e.g., the names and characteristics of the data fields), but also the
14 instructions for how that data is utilized and therefore how Facebook stores and uses data
15 intercepted from Private Messages (the subject of the above-described Requests).” (*Id.*)
- 16 • “[Configuration Tables] contain programming as to how data is redirected into databases
17 and thereafter used by Facebook.” (*Id.*)

18 6. I am not aware of any tables at Facebook that meet this description of “configuration
19 table” for the challenged practices. [REDACTED]

20 **Configuration Data**

21 7. Facebook does have information that is used by the source code—“configuration
22 data”—in various tables or systems, [REDACTED].
23 [REDACTED]. Nor is it possible to determine from looking at the data in these tables and
24 systems whether they are relevant to any particular product, practice, or subject matter. The best way
25 to find relevant configuration data is to review the sections of the source code for the practices at
26 issue, and identify specific “calls” to tables and systems for configuration data.

27 8. I understand that Plaintiffs purport to request configuration data relating to the
28 challenged practices. The best way to collect relevant configuration data for a given practice is to (a)
identify the source code for that practice, (b) review that code to identify calls for configuration data
from tables and systems, and (c) assess the results of those calls for the existence of relevant

1 configuration data, the capacity to export that data, and any other additional information available
2 about that data (for example, how it has changed over time). I know of no other way to identify
3 configuration data relevant to a given practice. It does not matter whether it is Plaintiffs or Facebook
4 that attempts to identify relevant calls for configuration data; the necessary process would be the
5 same. There are no existing tools to automate this process. Rather, with existing tools, this would be
6 an initial manual search for each piece of configuration data and a second manual search for any
7 historical information about each piece of configuration data.

8 9. Trying to review or search “databases” or “tables” for configuration data relevant to a
9 particular process, or for a general category of data (such as “data derived from Private Message URL
10 content” (Mot. at 10)), is not possible. [REDACTED]

11 [REDACTED]
12 [REDACTED]. The best—indeed, the
13 only—way to identify relevant configuration data is from the source code itself, as discussed above.

14 **Specific Databases And Tables That Plaintiffs Have Requested**

15 10. In their Motion, Plaintiffs identify five databases by name ([REDACTED],
16 Hive, Hbase), one logging system (Scribe), and nine specific tables. Plaintiffs ask that Facebook
17 produce all “configuration tables” for the databases and logging system, as well as the specific tables
18 listed.

19 11. The databases and tables identified by Plaintiffs contain information relating to
20 Facebook’s entire system—infrastructure, systems operations, security, front-end web design,
21 products, etc. They are not limited to the challenged practices. Similarly, the nine requested tables
22 alone contain hundreds of millions of cells of data, and they contain little, if any, information
23 remotely related to URLs in messages—let alone related to the challenged practices.

24 12. Plaintiffs request “configuration tables” from the following databases. I am not aware
25 of any tables in these databases fitting Plaintiffs’ description of a “configuration table” for the
26 challenged practices as they relate to URLs in messages.

- 27 • [REDACTED] is a [REDACTED]
28 [REDACTED] The three tables from

1 [REDACTED] that Plaintiffs identified by name (discussed further below) contain [REDACTED]
2 [REDACTED] of almost entirely irrelevant data, and two of the three do not contain any
3 configuration data at all.

- 4 • [REDACTED] [REDACTED] is a database concerning [REDACTED].
5 Objects and/or Associations are the building blocks for every piece of data we store at
6 Facebook. The five tables from [REDACTED] that Plaintiffs identified by name (discussed
7 further below) contain [REDACTED] of irrelevant data, much of which is
8 not configuration data at all or is already available to Plaintiffs in the source code.
- 9 • [REDACTED] is a database that includes the [REDACTED], which contains [REDACTED].
10 I understand that Plaintiffs claim that [REDACTED]
11 is a “security-related” database. This is incorrect. This database contains
12 [REDACTED] and is not limited to messaging
13 or to security-related variables or the four challenged practices.
- 14 • [REDACTED] is a database containing [REDACTED]. [REDACTED] alone consists of [REDACTED].
15 To put this into context, [REDACTED]. Plaintiffs did not
16 request any specific tables from [REDACTED] just “configuration tables,” which do not exist for
17 the challenged practices.
- 18 • [REDACTED] is a database containing [REDACTED]. Plaintiffs did not request any specific tables from [REDACTED]
19 just “configuration tables,” which do not exist for the challenged practices.
- 20 • [REDACTED] is a logging system that [REDACTED]. Plaintiffs did not request any specific information from [REDACTED] just
21 “configuration tables,” which do not exist for the challenged practices.

22 13. The specific tables identified by Plaintiffs from these databases also contain
23 information from all aspects of Facebook’s system, and they are not limited to information
24 concerning URLs in messages, let alone the four challenged practices. Moreover, some of the tables
25 identified by Plaintiffs do not contain configuration data at all; they do not configure Facebook’s
26 source code. These tables are simply internal tables, filled with highly sensitive information, for
27 purposes completely unrelated to the challenged practices. They contain hundreds of millions of
28 rows of irrelevant information.

- 29 • [REDACTED]: This is a table in the [REDACTED] Database regarding [REDACTED].
30 It was last updated on [REDACTED]. This is
31 not configuration data; it does not (and did not) impact the source code in any way. This
32 table was used for [REDACTED]. Because it was last
33 updated on [REDACTED], it will not include any tables created after that date. It does not
34 appear to have been in use since that time. It consists of a [REDACTED].
- 35 • [REDACTED]: This is a table listing all column names in all the tables in the
36 [REDACTED] discussed above. It was created for the same purposes as the
37 [REDACTED] table and, similarly, does not contain configuration data and does not

appear to have been updated since [REDACTED]. It consists of over [REDACTED] rows and [REDACTED] cells. Like [REDACTED].

• [REDACTED]: This is a table in the [REDACTED] Database regarding [REDACTED]. For example, there is data in this table [REDACTED] (a security-related process). The table consists of [REDACTED] rows and [REDACTED] cells. [REDACTED]

• [REDACTED]: This is a table in the [REDACTED] Database regarding [REDACTED]. There is no way to tell from looking at this data whether a given Association relates to any particular practice or subject matter. The table consists of over [REDACTED] rows and over [REDACTED] cells. [REDACTED]

• [REDACTED]: This is a table in the [REDACTED] Database regarding [REDACTED]. This is not configuration data; it is [REDACTED] that does not impact the source code in any way. To my knowledge, it has not been used in several years. Also, as in the [REDACTED] table, there is no way to tell from looking at this data whether a [REDACTED] relates to any particular practice or subject matter. The table consists of almost 20 million rows and almost [REDACTED] cells. [REDACTED]

• [REDACTED]: This is a table in the [REDACTED] Database regarding [REDACTED]. This information is already reflected in the source code that Plaintiffs have. The table consists of almost [REDACTED] rows and almost [REDACTED] cells.

• [REDACTED]: This is a table in the [REDACTED] Database regarding [REDACTED]. This is not configuration data; it does not (and did not) impact the source code in any way. It consists of almost [REDACTED] rows and [REDACTED] cells.

• [REDACTED]: This is a table in the [REDACTED] Database regarding [REDACTED]. It consists of [REDACTED] and [REDACTED] cells.

• [REDACTED]: [REDACTED] is a system containing data that [REDACTED]. I understand that Plaintiffs claim that [REDACTED] is a “security-related” database. This is incorrect. This database contains [REDACTED] and is not limited to messaging or to security-related variables or the four challenged practices. It is not restricted by, nor searchable based on, practice or subject matter. It consists of almost [REDACTED] and over [REDACTED] cells.

1 Again, the best way for Plaintiffs to identify information from any of these tables or systems relating
2 to the challenged practices (as they relate to URLs in messages) is to review the code, as explained
3 above.

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct and that this declaration was executed on August 19, 2016 in London,
6 England.

7 */s/ Neal Poole*

8 Neal Poole

1 **ATTORNEY ATTESTATION**

2 I, Joshua A. Jessen, attest that concurrence in the filing of this Declaration of Neal Poole has
3 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