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(Only admitted in California; practice directly supervised by members of the D.C. Bar)

**COMPETITIVE ENTERPRISE INSTITUTE  
CENTER FOR CLASS ACTION FAIRNESS**

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*Attorneys for Objector Anna St. John*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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

Plaintiffs,

v.

FACEBOOK INC.,

Defendant.

Case No. 4:13-cv-5996-PJH

**DECLARATION OF ANNA ST. JOHN**

Date: August 9, 2017

Time: 9:00 a.m.

Courtroom: 3, 3rd Floor

Judge: Hon. Phyllis J. Hamilton

ANNA ST. JOHN,

Objector.

Case No. 4:13-cv-5996-PJH

DECLARATION OF ANNA ST. JOHN

1 I, Anna St. John, declare as follows:

2 1. I have personal knowledge of the facts set forth herein and, if called as witness, could and  
3 would testify competently thereto.

4 2. My full legal name is Anna Elizabeth Wagner St. John. My business address is Competitive  
5 Enterprise Institute, 1310 L Street NW, 7th Floor, Washington, DC 20005. My telephone number is  
6 (917) 327-2392. My email address is anna.stjohn@cei.org.

7 3. I am a natural-person Facebook user located in the United States.

8 4. On multiple occasions from December 30, 2011 to March 1, 2017, including on or about  
9 June 4, 2012, August 5, 2012, November 21, 2012, June 24, 2015, and September 6, 2015, I sent or  
10 received private messages on Facebook to or from another Facebook user that included a URL in its  
11 content and from which Facebook generated a URL attachment.

12 5. I am not a director, officer, agent, or employee of Facebook or its subsidiaries and affiliated  
13 companies. I am not a member of the Court's immediate family or the Court staff, nor an immediate  
14 family member or staff member of any appellate court to which this matter may eventually be assigned.

15 6. I have engaged my colleagues at the Competitive Enterprise Institute's Center for Class  
16 Action Fairness ("CCAF") to represent me in this matter. Attorneys who assisted or had other  
17 involvement with this objection are Theodore H. Frank, Melissa A. Holyoak, Adam E. Schulman, M.  
18 Frank Bednarz, and William I. Chamberlain. I intend to appear through counsel at the fairness hearing  
19 currently scheduled for August 9, 2017.

20 7. I bring this objection in good faith to prevent approval of an unfair settlement. Unlike  
21 many objectors who attempt or threaten to disrupt a settlement unless plaintiffs' attorneys buy them  
22 off with a share of attorneys' fees, CCAF does not engage in *quid pro quo* settlements and will not  
23 withdraw an objection or appeal in exchange for payment.

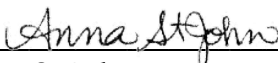
24 8. Thus, if contrary to CCAF's practices and recommendation, I agree to withdraw my  
25 objection or any subsequent appeal for a payment by plaintiffs' attorneys or the defendant paid to me  
26 or any person or entity related to me in any way without court approval, I hereby irrevocably waive

1 any and all defenses to a motion seeking disgorgement to the class of any and all funds paid in  
2 exchange for dismissing my appeal. In addition, if this Court has any skepticism about my motives, I  
3 am happy to stipulate to an injunction forbidding me from seeking compensation for settling my  
4 objection at any stage without court approval.

5 9. The specific grounds of my objection are identified in the memorandum to be filed by my  
6 attorney contemporaneously with this declaration.

7 I declare under penalty of perjury under the laws of the United States of America that the foregoing  
8 is true and correct.

9  
10 Executed on June 26, 2017, in New Orleans, Louisiana.

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12 \_\_\_\_\_  
13 Anna St. John