

EXHIBIT C3

EXHIBIT C3

Deposition Designations

PLAINTIFF LEADER TECHNOLOGIES, INC.'S DEPOSITION DESIGNATIONS

Leader's Designations	Facebook's Objections	Facebook's Counter-designations	Leader's Objections to Counter-designations
Andrew Bosworth testimony (03/10/10)			
7:20-8:15; 64:19-71:7; 89:18-93:24; 95:11-102:25; 106:11-110:18; 113:3-115:13; 118:8-123:1; 133:20-137:4; 139:2-155:3; 162:4-20; 163:4-171:2; 172:25-174:15; 194:21-196:11	68:1-12 - FRE 602 121:2-122:2 - FRE 602 135:6-137:4 - FRE 602 139:2-155:3 - FRE 401, 402, 602, 701 163:4-16 - FRE 401; 402; 602 163:17-171:2 - FRE 401; 402 172:25-174:15 - FRE 401; 402	15:3-16:17 17:6-15 29:23-30:5 31:9-11 83:3-10 83:17-19 103:1-3 196:12-198:11 246:19-247:13	15:3-16:17 - FRE 402, 403, Outside Scope of Designation 17:6-15 - FRE 402, 403, Outside Scope of Designation 29:23-30:5 - FRE 402, 403, Outside Scope of Designation 31:9-11 - FRE 402, 403, Outside Scope of Designation 83:3-10 - FRE 402, 403, Outside Scope of Designation 83:17-19 - FRE 402, 403, Outside Scope of Designation 103:1-3 - FRE 402, 403, Outside Scope of Designation 196:12-198:11 - FRE 402, Outside Scope of Designation 246:19-247:13 - FRE 402, 403, Outside Scope of Designation
Daniel Chai testimony (03/03/10)			
6:20-7:3; 92:14-93:22; 113:4-126:3	113:4-126:3 - FRE 401; 402	93:23-95:2	No Objections
Christopher Cox testimony (03/05/10)			
7:16-9:5; 10:3-7; 12:13-16:16; 18:6-20; 21:9-22:11; 30:15-34:22; 37:3-40:8; 53:20-54:17;	38:1-16 - FRE 401; 402; 701 60:19-62:13 - FRE 401; 402 72:7-73:24 - FRE 401; 402;	22:13-23:24 55:18-22	No Objections

EXHIBIT C3

Deposition Designations

Leader's Designations	Facebook's Objections	Facebook's Counter-designations	Leader's Objections to Counter-designations
56:13-62:13; 72:7-73:24; 82:16-23; 85:15-90:12; 103:18-105:20	602 85:15-89:11 - FRE 401; 402; 403; 602; 701 103:18-105:20 - FRE 401; 402; 701		
Adam D'Angelo testimony (02/19/10)			
6:19-7:11; 15:9-23:6; 26:7-31:2; 48:13-52:20; 73:17-76:4; 82:3-87:6; 88:17-89:21; 101:7-110:1; 125:12-128:17; 132:1-134:1; 145:22-147:16	15:9-17:7—FRE 401; 402; 602 17:8-18:13—FRE 401; 402 19:9-20:8—FRE 602 20:9-23:6—FRE 401; 402; 602 26:7-22—FRE 401; 402; 602 26:23-28:10—FRE 401; 402; 602 48:13-52:20 - FRE 401; 402; 602 73:17-76:4 - FRE 401; 402; 602; 701 84:5-86:13 - FRE 602; 701 88:17-89:21 - FRE 602; 701 103:2-19—FRE 602; 701 103:20-104:25—FRE 401; 402 107:1-8—FRE 602 107:9-111:1—FRE 401; 402 125:12-127:12—FRE 602; 701 127:13-128:17—FRE 401; 402; 602; 701 145:22-147:16 - FRE 602; 701	31:3-34:5 52:21-54:11 77:8-78:25 80:17-82:1 87:7-88:16 97:22-98:10 129:10-15	31:3-34:5 - FRE 402, 403, Outside Scope of Designation 52:21-54:11 - FRE 402, 403, Outside Scope of Designation 77:8-78:25 - FRE 403 80:17-82:1 - FRE 402, 403, Outside Scope of Designation 87:7-87:23 - FRE 402, 403, Outside Scope of Designation 87:24-88:16 - FRE 402, FRE 403, Outside Scope of Designation, Non-responsive 97:22-98:10 - FRE 402, 403 Outside Scope of Designation 129:10-15 - FRE 402, 403, Outside Scope of Designation

EXHIBIT C3

Deposition Designations

Leader's Designations	Facebook's Objections	Facebook's Counter-designations	Leader's Objections to Counter-designations
Dustin Moskovitz testimony (02/12/10)			
7:19-13:7; 17:11-23; 18:16-19:16; 20:18-21:17; 22:10-25; 28:24-29:3; 32:6-34:1; 79:4-81:17; 99:21-100:17; 101:17-107:2; 112:7-113:23; 134:22-139:2; 160:23-162:14	9:1-10—FRE 602; 701 12:11-13:7—FRE 401; 402; 602 19:9-16—FRE 401; 402; 602 20:18-21:17 - FRE 401; 402 99:21-100:17 - FRE 602; 701 104:11-17—FRE 602 106:21-107:2—FRE 602 113:8-13—FRE 602	13:19-24 18:7-15 19:17-21 30:11-19 69:23-70:11 77:8-78:7 82:14-83:13 133:21-134:8 171:9-18	13:19-24 - FRE 402, 403, Outside Scope of Designation 18:7-15 - FRE 402, 403, Outside Scope of Designation 19:17-21 - FRE 402, 403, Outside Scope of Designation 30:11-19 - FRE 402, Outside Scope of Designation 69:23-70:11 - FRE 402, Scope of Designation 77:8-78:7 - FRE 402, Outside Scope of Designation 82:14-83:13 - FRE 402, 403, Outside Scope of Designation 99:21-100:17 - FRE 402, Outside Scope of Designation 104:11-17—FRE 602 106:21-107:2—FRE 602 113:8-13—FRE 602
Dan Rose testimony (03/23/10)			
8:19-22; 18:22-19:17; 37:14-40:22; 50:7-51:14; 108:13-109:3; 147:7-149:22; 151:24-152:25; 156:25-157:12; 161:17-162:5; 167:22-170:25; 171:20-173:3	37:14-38:11—FRE 602; 701 39:3-14—FRE 401; 402 40:5-22—FRE 602; 701 50:7-51:14 - FRE 602; 701 108:13-109:3 - FRE 401; 402; 602; 701	36:19-37:12 41:1-15 62:10-18 128:14-130:17 134:14-135:2 139:5-14	36:19-37:12 - FRE 402, Outside Scope of Designation 41:1-15 - FRE 402, Outside Scope of Designation 62:10-18 - FRE 402, Outside Scope of Designation 128:14-130:17 - FRE 402, Outside Scope of Designation 134:14-135:2 - FRE 402, Outside Scope of Designation 139:5-14 - FRE 402, Outside Scope of Designation

EXHIBIT C3

Deposition Designations

Leader's Designations	Facebook's Objections	Facebook's Counter-designations	Leader's Objections to Counter-designations
	151:24-152:25 - FRE 401; 402; 602; 701 156:25-157:12 - FRE 401; 402; 602 161:17-162:5 - FRE 602 167:22-170:25 - FRE 401; 402; 602; 701; 801 171:20-173:3 - FRE 401; 402; 801	149:23-151:14 160:6-19	129:19-130:17 - FRE 402, 403, Outside Scope of Designation 134:14-135:2 - FRE 402, Outside Scope of Designation 139:5-14 - FRE 402, 403, Outside Scope of Designation 149:23-151:14 - FRE 402, Outside Scope of Designation 160:6-19 - FRE 402, Outside Scope of Designation
Ruchi Sanghvi testimony (03/16/10)			
6:19-7:5; 10:14-11:1; 105:4-109:5; 130:16-139:10	105:4-109:5 - FRE 602; 701 130:16-139:10 - FRE 401; 402; 602; 701	84:21-85:1 86:4-88:12 93:7-94:2 101:21-102:18	84:21-85:1 - FRE 403 86:4-88:12 - FRE 403 93:7-94:2 - FRE 403 101:21-102:18 - FRE 403
James Wang testimony (03/05/10)			
7:16-8:16; 13:11-21:15; 24:17-32:15; 41:17-48:4; 64:21-65:5; 82:15-83:7; 88:21-96:8; 102:17-105:20; 106:7-109:23; 123:6-125:21; 141:16-142:2; 144:22-146:8; 152:11-154:24; 180:17-184:11; 186:19-187:10; 191:16-196:14; 230:12-237:5; 240:4-241:24	13:11-14:21—FRE 401; 402 14:22-19:2—FRE 401; 402; 602; 701 24:17-32:15 - FRE 602 41:17-25—Fed.R. Evid. 401; 402; 602 42:1-48:4—FRE 401; 402 64:21-65:5 - FRE 701 82:15-83:7 - FRE 602; 701 92:12-96:8—FRE 602; 701	21:17-23 23:10-17 24:14-16 65:6-66:17 81:13-20 81:23-82:1 96:10-13 125:24-135:23 142:4-11	21:17-23 - FRE 402, 403, Outside Scope of Designation 23:10-17 - FRE 402, 403, 602, Outside Scope of Designation 24:14-16 - FRE 402, Outside Scope of Designation 65:6-66:17 - FRE 402, Outside Scope of Designation 81:13-20 - FRE 402, 403, Outside Scope of Designation 81:23-82:1 96:10-13 125:24-135:23 142:4-11

EXHIBIT C3

Deposition Designations

Leader's Designations	Facebook's Objections	Facebook's Counter-designations	Leader's Objections to Counter-designations
	<p>103:16-104:10—FRE 602; 701 105:15-20—FRE 602; 701 107:12-109:23—FRE 602; 701 141:16-142:2 - FRE 401; 402; 602; 701 144:22-146:8 - FRE 401; 402; 602; 701 152:11-154:24 - FRE 401; 402; 602; 701 180:17-184:11 - FRE 401; 402; 602; 701 193:20-194:1 - FRE 602; 701 230:12-237:5 - FRE 401; 402; 602; 701</p>	<p>143:13-16</p>	<p>81:23-82:1 - FRE 402, 403, Outside Scope of Designation 96:10-13 - FRE 402, Outside Scope of Designation 125:24-135:23 - FRE 402, 403, Outside Scope of Designation 142:4-11 - FRE 402, 403, Outside Scope of Designation 143:13-16 - FRE 402, 403, Outside Scope of Designation, Incomplete Designation</p>
<p>Joshua Wiseman testimony (02/25/10)</p>			
<p>9:22-11:20; 13:5-18:10; 22:8-23:15; 24:14-46:20; 50:1-55:19; 56:15-60:8; 62:7-89:23; 91:7-122:18; 130:2-136:2; 136:20-141:9; 145:9-149:8; 150:4-151:12; 151:25-156:4; 158:11-24; 162:2-18; 167:9-168:24; 169:15-171:16; 173:6-175:13; 179:21-183:5; 193:25-195:18; 220:7-19; 222:8-228:6; 235:9-243:24; 246:7-253:6; 258:2-264:7; 267:8-268:23;</p>	<p>43:17-44:22 - FRE 611(a) 50:1-50:25 - FRE 602 54:8-55:19 - FRE 401; 402 56:15-60:8 - FRE 401; 402 66:4-67:2—FRE 401; 402 67:23-68:5—FRE 401; 402 71:17-72:3—FRE 401; 402 72:19-75:6—FRE 401; 402 76:18-77:2—FRE 401; 402 78:16-25—FRE 401; 402 79:22-80:2—FRE 401; 402 83:8-10—FRE 401; 402</p>	<p>21:2-20 171:18-22 172:13-15 203:14-204:4</p>	<p>21:2-20 - FRE 402, 403, Outside Scope of Designation 171:18-22 - FRE 402, 403, Outside Scope of Designation 172:13-15 - FRE 402, 403, Outside Scope of Designation 203:14-204:4 - FRE 402, 403, Outside Scope of Designation</p>

EXHIBIT C3

Deposition Designations

Leader's Designations	Facebook's Objections	Facebook's Counter-designations	Leader's Objections to Counter-designations
269:7-282:8; 285:8-15; 291:11-292:17	92:15-93:10—FRE 401; 402 93:19-97:10—FRE 401; 402; 602 97:11-111:24—FRE 401; 402 111:25-112:9—FRE 401; 402; 602 112:10-117:15—FRE 401; 402 117:16-118:10—FRE 401; 402; 602 118:11-122:18—FRE 401; 402 135:22-25 - FRE 401; 402 136:20-141:9 - FRE 401; 402 145:9-149:8 - FRE 401; 402 150:4-151:12 - FRE 401; 402; 602; 701 151:25-153:20 - FRE 401; 402 158:11-24 - FRE 401; 402 162:2-18 - FRE 401; 402 167:9-168:24 - FRE 401; 402 169:15-171:16 - FRE 401; 402 173:6-175:13 - FRE 401; 402 179:21-182:23 - FRE 401; 402 182:25-183:5 - FRE 401; 402; 602 193:25-195:18 - FRE 401; 402 220:7-19 - FRE 401; 402 222:8-228:6 - FRE 401; 402 235:9-243:24 - FRE 401; 402 246:7-247:5—FRE 401; 402		

EXHIBIT C3

Deposition Designations

Leader's Designations	Facebook's Objections	Facebook's Counter-designations	Leader's Objections to Counter-designations
	247:24-248:11—FRE 401; 402 248:13-21—FRE 602; 701 250:2-25—FRE 602; 701 251:1-25—FRE 401; 402; 602; 701 252:2-253:6—FRE 401; 402; 602; 701; 801 258:2-3—FRE 401; 402 258:4-12—FRE 401; 402; 602; 701 258:13-259:18—FRE 401; 402 259:19-260:15—FRE 401; 402; 602; 701 260:17-261:13—FRE 401; 402 261:15-262:7—FRE 401; 402; 602; 701 262:9-264:7—FRE 401; 402 267:8-268:23 - FRE 401; 402; 602; 701; 402 270:7-272:21 - FRE 401; 402 274:6-282:8 - FRE 401; 402 285:8-15 - FRE 401; 402 291:11-292:17 - FRE 401; 402		
Mark Zuckerberg testimony (05/11/10)			
8:10-9:9; 9:15-17; 10:5-9; 10:14-12:15; 14:1-15:2; 19:25-21:13; 28:14-32:5; 38:6-40:2	12:4-15 - FRE 401/402 Relevance; FRE 403 Prejudice; FRE 404 Character/Prior Bad Acts	16:22-25; 17:8-18:8; 22:20-25; 25:23-26:18	16:22-25 -FRE 402, 403, Outside Scope of Designation 17:8-18:8 - FRE 402, 403, Outside Scope of Designation,

EXHIBIT C3

Deposition Designations

Leader's Designations	Facebook's Objections	Facebook's Counter-designations	Leader's Objections to Counter-designations
	14:1-15:2 - FRE 401/402 Relevance; FRE 403 Prejudice; FRE 404 Character/Prior Bad Acts 28:15-32:5 - FRE 401/402 Relevance; FRE 403 Prejudice; FRE 404 Character/Prior Bad Acts; FRE 801 Hearsay		Incomplete Designation 22:20-25 - FRE 402, 403, Outside Scope of Designation 25:23-26:18 - FRE 402, 403, Outside Scope of Designation

EXHIBIT C3

Deposition Designations

DEFENDANT FACEBOOK, INC.'S DEPOSITION DESIGNATIONS

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
Michael Ackrell testimony			
46:7-8; 46:12; 46:14-23; 47:2-9; 47:11-16; 47:20-24; 48:1-2; 48:6-7; 48:9-11; 48:15; 48:17-20; 48:24-25; 49:1-3; 49:5-7; 49:11-13; 53:5-17; 53:20-23	46:7-8, 46:12, 46:14-18 - FRE 402, 403, 501, 802, Lack of Foundation 46:19-21 - FRE 402, 403, Lack of Foundation 46:22-23, 47:2-9 - FRE 402, 403, 501, 802, Lack of Foundation 47:11-16, 47:20-24 - FRE 402, 403, 501, 802 48:1-2, 48:6-7, 48:9-11, 48:15, 48:17-20, 48:24-25, 49:1-3, 49:5-7, 49:11-13 - FRE 402, 403, 501, 802 53:5-17; 53:20-23- FRE 402, 403, 602, 802, Lack of Foundation, Vague and Ambiguous	No Counter-designations	
Stephen Boord testimony			
33:19-34:2; 34:4-6; 34:8-9; 34:11-17; 34:19:35:2; 35:4-8; 48:1-13; 48:15-50:17; 50:19-52:3; 54:8-18; 54:20-55:1-10; 76:20-24; 78:20-79:1; 80:5-7; 80:9-11; 80:13-22	33:19-34:2, 34:4-6, 34:8-9, 34:11-17, 34:19:35:2, 35:4-8 - FRE 402, 403, 501, 802, Lack of Foundation 48:1-13, 48:15-49:4 - FRE 402, 403, 802 49:5-50:8 - FRE 402, 403, 802	52:4-53:9; 80:23-81:2	Objections: 52:4-53:9—Relevance, FRE 401, 402; Lacks Foundation, FRE 403, 602; Confusion, Waste of Time; Hearsay, FRE 802; Not needed for

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	50:9-17, 50:19-52:3 - FRE 402, 403, 802 54:8-18, 54:20-25 - FRE 402, 403, 602, 802, Calls for Speculation 55:1-10 - FRE 402, 403, 802 76:20-24 - FRE 402, 403, Lack of Foundation 78:20-79:1 - FRE 402, 403, Lack of Foundation 80:5-7, 80:9-11, 80:13-22 - FRE 402, 403, 501, 802		completeness 80:23-81:2—Relevance, FRE 401, 402; Waste of Time, FRE 403; Not needed for completeness <u>Counter Designations:</u> ¹ 91:15-92:24
Tim Fathbruckner testimony			
5:1-14; 8:8-9:12; 9:13-20; 16:9-21:10; 22:6-17; 35:16-40:13; 41:12-21; 44:11-21; 45:5-11; 50:3-51:7; 64:15-67:3; 71:7-85:13; 87:1-92:16; 93:13-96:3; 96:8-97:19; 108:21-24; 112:6-15; 113:7-15; 114:16-22; 117:16-118:2; 118:12-120:4; 131:21-132:18; 141:9-144:16; 145:25-146:19; 147:19-149:9	8:8-9:12 - FRE 402 36:1-20 - Vague and Ambiguous 36:21-37:11 - FRE 105, 402, 403, Lack of Foundation 37:12-38:4 - FRE 402, 403 38:5-13 - FRE 402, 403, Misstates Testimony 38:14-38:25 - FRE 402, 403 39:1-40:13 - FRE 105, 402, 403 41:12-21 - FRE 402, 403, Lack of Foundation 44:11-21, 45:5-11 - FRE 105,	21:11-15; 40:14-41:11; 67:4-10; 92:17-93:12; 112:16-113:6; 118:3-11; 120:5-7; 144:17-21	<u>Objections:</u> 41:10-11—Colloquy 67:4-10—Speculation, FRE 401, 402, 403 92:17-93:12—Speculation, Lay Opinion, Lacks Foundation, FRE 401, 402, 403, 602 <u>Counter Designations:</u> 21:16-22

¹ Leader objects to Facebook's untimely addition of counter-counter designations, which violates the Local Rules and provide Leader with no opportunity to respond. Leader reserves its rights to raise any additional objections to these counter-counter designations at a later time.

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>402, 403, Lack of Foundation, Calls for Speculation 51:2-51:7 - FRE 402, 403, Lack of Foundation 64:15-65:4 - FRE 105, 402, 403, Misstates Testimony, Lack of Foundation 65:5-65:13 - FRE 105, 402, 403, Incomplete Hypothetical 65:14-66:2 - FRE 105, 402, 403, Calls for a Legal Conclusion, Vague and Ambiguous 66:3-9 - FRE 105, 402, 403 66:10-13 - FRE 105, 402, 403, 802 66:14-18 - FRE 105, 402, 403, Calls for a Legal Conclusion, Lack of Foundation 66:19-67:3 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation, Misstates Testimony 71:7-74:12 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation 74:13-24 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>74:25-84:2 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation</p> <p>84:3-24 - FRE 105, 402, 403, Calls for Legal Conclusion, Calls for Speculation, Lack of Foundation</p> <p>84:25-85:13, 87:1-89:14 - FRE 105, 402, 403, Calls for Speculation, Lack of Foundation</p> <p>89:15-92:16 - FRE 105, 402, 403, Calls for Speculation, Calls for Legal Conclusion, Vague and Ambiguous, Lack of Foundation</p> <p>93:13-17- FRE 105, 402, 403, Calls for Speculation</p> <p>93:18-96:3- FRE 105, 402, 403, Calls for Speculation, Calls for Legal Conclusion, Vague and Ambiguous, Lack of Foundation</p> <p>96:8-97:2 - FRE 105, 402, 403, Calls for Speculation, Lack of Foundation</p> <p>97:3-97:19 - FRE 105, 402, 403, Calls for Speculation, Calls for Legal Conclusion,</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>Vague and Ambiguous, Lack of Foundation 108:21-24 - FRE 105, 402, 403 112:6-12 - FRE 402, 403 112:13-15 - FRE 105, 402, 403, Vague and Ambiguous 113:7-9 - FRE 105, 402, 403, Call for Speculation, Vague and Ambiguous 113:10-113:15 - FRE 105, 402, 403, Vague and Ambiguous 114:16-22 - FRE 402, 403, Vague and Ambiguous, Calls for Speculation 117:16-118:2 - FRE 105, 402, 403, Calls for Speculation, Vague and Ambiguous 118:12-118:21 - FRE 105, 402, 403, Vague and Ambiguous 131:21-132:5 - FRE 105, 402, 403, Calls for Speculation, Vague and Ambiguous 132:6-132:18 - FRE 105, 402, 403, Calls for Speculation, Calls for Legal Conclusion, Vague and Ambiguous, Lack of Foundation 141:9-144:16 - FRE 105, 402, 403, Calls for Speculation,</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
<p>Jeffrey Lamb testimony</p> <p>5:1-19; 11:10-24:21; 28:10-36:14; 48:3-54:22; 67:4-18; 68:12-70:5; 78:16-82:25; 84:1-85:6; 86:1-5; 87:6-92:22; 94:25-98:9; 98:21-99:3; 99:15-101:10; 101:16-102:13; 103:13-104:10; 108:7-8; 115:22-120:1; 120:20-123:5; 124:19-128:19; 129:12-132:14; 132:20-134:7; 135:9-139:2; 141:6-142:11; 151:1-25; 154:8-15; 159:4-160:3; 162:10-18; 169:24; 174:12-183:1; 187:23-194:4; 194:8-25; 195:5-17; 195:19-199:7; 199:11-21; 200:15-20; 215:14-216:19; 230:25-231:14; 235:7-21;</p>	<p>Calls for Legal Conclusion, Vague and Ambiguous, Lack of Foundation</p> <p>145:25-146:19 - FRE 105, 402, 403, Calls for Speculation, Vague and Ambiguous, Lack of Foundation</p> <p>147:19-149:9 - FRE 402, 403, Calls for Speculation, Vague and Ambiguous</p>		
<p>5:1-19; 11:10-24:21; 28:10-36:14; 48:3-54:22; 67:4-18; 68:12-70:5; 78:16-82:25; 84:1-85:6; 86:1-5; 87:6-92:22; 94:25-98:9; 98:21-99:3; 99:15-101:10; 101:16-102:13; 103:13-104:10; 108:7-8; 115:22-120:1; 120:20-123:5; 124:19-128:19; 129:12-132:14; 132:20-134:7; 135:9-139:2; 141:6-142:11; 151:1-25; 154:8-15; 159:4-160:3; 162:10-18; 169:24; 174:12-183:1; 187:23-194:4; 194:8-25; 195:5-17; 195:19-199:7; 199:11-21; 200:15-20; 215:14-216:19; 230:25-231:14; 235:7-21;</p>	<p>13:17-22:2 - FRE 402</p> <p>22:3-23:6 - FRE 402, 403, Calls for Legal Conclusion, Vague and Ambiguous</p> <p>24:11-24:21 - FRE 402</p> <p>28:10-28:20 - FRE 402, Vague and Ambiguous, Lack of Foundation</p> <p>28:21-29:23 - FRE 402</p> <p>29:24-30:16 - Vague and Ambiguous, Lack of Foundation</p> <p>31:8-31:14 - FRE 402, 403, Vague and Ambiguous, Calls for Legal Conclusion</p> <p>31:15-31:23 - FRE 402, 403</p> <p>48:3-48:20 - Lack of</p>	<p>54:23-57:7; 67:19-25; 98:10-20; 99:4-14; 102:14-103:12; 108:9-13; 123:6-24; 132:15-19; 134:8-17; 160:4-162:9; 172:22-173:9; 183:18-184:23; 201:8-204:16</p>	<p>Objections:</p> <p>54:23-57:7—Not necessary for completeness</p> <p>98:18-20—Colloquy</p> <p>99:4-14—Not necessary for completeness</p> <p>102:14-103:12—Speculation, Lacks Foundation, FRE 602; Lay Opinion, FRE 701</p> <p>123:6-24—Relevance, FRE 401, 402; Prejudice, FRE 403</p> <p>160:4-162:9—Relevance, FRE 401, 402; Prejudice, FRE 403; Lack Foundation, FRE 602; Lay Opinion, FRE 701; Calls</p>

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
<p>239:23-241:25; 243:23-245:9</p>	<p>Foundation 48:21-49:19 - FRE 402, 403 49:20-50:2 - FRE 402, 403, Vague and Ambiguous 50:3-51:20 - FRE 402, 403 51:21-53:11 - Vague and Ambiguous 53:12-54:22 - FRE 403, Vague and Ambiguous 67:4-18 - FRE 105, 402, 403, Vague and Ambiguous, Lack of Foundation 68:12-70:5 - FRE 402, 403, Vague and Ambiguous 78:16-79:6 - FRE 402, 403 79:7-79:24 - FRE 402, 403 79:25-80:14 - FRE 402, 403 80:14-81:13 - FRE 402, 403 81:14-82:4 - FRE 402, 403 82:5-25 - FRE 402 84:1-85:6 - FRE 402, 403 86:1-5 - FRE 402, 403 87:6-88:10 - FRE 402, 403, Calls for Speculation, Lack of Foundation 88:15-91:10 - FRE 402, 403, Lack of Foundation 91:11-92:11 - Lack of Foundation</p>		<p>for legal conclusion; Subject to Courts claim construction 183:18-184:23—FRE 401, 402; Not necessary for completeness; Calls for Speculation, FRE 602; Improper Lay Opinion, FRE 701 <u>Counter Designations:</u> 68:2-3; 134:18-135:1; 173:11- 18; 206:1-3; 206:5-8; 206:10- 17; 206:19-207:3; 207:5-15; 207:17-18; 207:20-21; 207:23; 207:25-208:1; 208:4-5; 208:7- 13; 208:15-19; 208:21-23; 208:25-3; 208:6-9</p>

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>92:12-92:22 - FRE 402, Calls for Speculation 94:25-96:14 - FRE 105, 402, 403 96:15-97:1 - FRE 105, 402, 403, Misstates Testimony 97:2-98:9 - FRE 105, 402, 403, Calls for a Legal Conclusion 98:21-99:3 - FRE 105, 402, 403, Calls for a Legal Conclusion 99:15-101:10 - FRE 105, 402, 403, Calls for a Legal Conclusion 101:16-102:6 - FRE 105, 402, 403 102:7-13 - FRE 105, 402, 403, Vague and Ambiguous 103:13-104:10 - FRE 105, 402, 403, Calls for a Legal Conclusion 108:7-8 - FRE 402, 403 115:22-117:19 - FRE 402, 403 117:20-118:4 - FRE 403, Vague and Ambiguous 118:5-12 - FRE 105, 402, 403 118:13-118:24 - FRE 403, Vague and Ambiguous 118:25-119:4 - FRE 403,</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>Misstates Testimony 119:5-17 - FRE 403, Vague and Ambiguous, Misstates Testimony 119:18-120:1 - FRE 402, 403, Vague and Ambiguous 120:20-121:6 - FRE 402, 403, Lack of Foundation 121:7-123:5 - FRE 402, 403, 501, Vague and Ambiguous 124:19-125:5 - FRE 402, 403, 802, Lack of Foundation 125:6-126:8 - FRE 402, 403 126:9-127:13 - FRE 402, 403, Misstates Testimony 127:14 -128:7 - FRE 402, 403, Calls for Speculation 128:8-19 - FRE 402, 403 129:12-130:5 - FRE 402 130:6-132:14 - FRE 402, 403, Calls for Speculation, Lack of Foundation 132:20-133:23 - FRE 402, 403, Vague and Ambiguous 133:24-134:7 - FRE 402, 403, Vague and Ambiguous, Calls for Speculation 135:9-135:18 - FRE 402, 403, 602, Lacks Foundation, Calls</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>for Speculation 135:13-136:2 - FRE 402, 403, Lacks Foundation, Calls for Speculation, Misstates Testimony 136:3-139:2 - FRE 402, 403, Lacks Foundation, Calls for Speculation 141:6-142:11 - FRE 402, 403 159:4-160:3 - FRE 403, Calls for Legal Conclusion, Vague and Ambiguous 162:10-18 - FRE 402, 403, Calls for Legal Conclusion, Vague and Ambiguous 169:24 - Vague and Ambiguous 174:12-175:1 - FRE 403, Calls for a Legal Conclusion 175:2-175:8 - FRE 403 175:9-16 - FRE 105, 402, 403, Calls for Speculation 175:17-176:7 - FRE 105, 402, 403, Calls for Speculation, Calls for Legal Conclusion 176:8-179:7- FRE 105, 402, 403, Calls for Legal Conclusion 179:8-180:25 - FRE 105, 402, 403, Vague and Ambiguous</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>181:1-183:1 - FRE 105, 402, 403, Vague and Ambiguous, Calls for Legal Conclusion</p> <p>187:23-189:2 - FRE 402, 403, Vague and Ambiguous, Calls for Legal Conclusion, Calls for Speculation</p> <p>189:3-20 - FRE 402, 403</p> <p>189:21-190:13 - FRE 402, 403, 601, Calls for Speculation, Lack of Foundation</p> <p>190:14-191:5 - FRE 402, 403, Calls for Speculation, Lack of Foundation</p> <p>191:6-192:2 - FRE 402, 403</p> <p>192:3-193:2 - FRE 402, 403, 602, Calls for Speculation, Lack of Foundation, Vague and Ambiguous</p> <p>193:3-194:4 - FRE 402, 403, 602, Calls for Speculation, Calls for Legal Conclusion, Vague and Ambiguous, Lack of Foundation</p> <p>194:8-25 - FRE 402, 403, 602, Calls for Speculation, Calls for Legal Conclusion, Vague and Ambiguous, Lack of Foundation</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>195:5-17 - FRE 402, 403, 602, Calls for Speculation, Calls for Legal Conclusion, Vague and Ambiguous, Lack of Foundation</p> <p>195:19-197:18 - FRE 402, 403, 602, Calls for Speculation, Calls for Legal Conclusion, Vague and Ambiguous, Lack of Foundation</p> <p>197:19-199:7 - FRE 402, 403, 602, Calls for Speculation, Calls for Legal Conclusion, Vague and Ambiguous, Lack of Foundation</p> <p>199:11-21 - FRE 402, 403</p> <p>200:15-20 - FRE 402, 403, Calls for Speculation</p> <p>215:14-216:19 - FRE 402, 403, Calls for Speculation, Lack of Foundation</p> <p>230:25-231:14 - FRE 402, 403, Lack of Foundation, Calls for Speculation</p> <p>235:7-21 - FRE 402, 403, Lack of Foundation, Calls for Speculation</p> <p>239:23-241:25 - FRE 402, 403, Lack of Foundation, Calls for</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	Speculation, Calls for Legal Conclusion 243:23-245:9 - Lack of Foundation, Calls for Speculation		
Michael McKibben testimony 1			
<p>9:8-11; 10:10-12; 10:18-21; 28:15-29:10; 29:12-31:1; 35:25-36:17; 36:21-24; 37:1-4; 37:24-38:1; 39:4-6; 39:10-12; 41:15-16; 41:19-20; 41:22-25; 42: 3-5; 42:7-13; 42:16-18; 42:20-43:16; 43:19-25; 44:2-3; 44:6-14; 44:16-18; 44:21-23; 45:20-23; 46:1-6; 46:20-47:17; 48:10-15; 49:2-18; 50:12-51:4; 51:16-17; 51:20-23; 51:25- 52:4; 52:7-13; 52:24-53:1; 54:24-55:6; 55:9-15; 74:15-20; 74:23-25; 75:2-10; 75:13-14; 75:16-76:2; 76:5-6; 76:8-13; 76:15-18; 76:21-24; 76:5-10; 76:13-86:7; 84:5-10; 84:13- 86:7; 86:24-88:6; 88:9-11; 96:15-19; 96:23-97:7; 98:4-6; 98:9-10; 98:12-21; 98:24-99:3; 99:5-12; 99:15-21; 99:23- 100:16; 100:19-101:1; 101:21-</p>	<p>28:15-29:10 - Lack of Foundation, Vague and Ambiguous 35:25-36:11, 36:12-36:17, 36:21-24, 37:1-4 - FRE 402, 403, 701, Calls for a Legal Conclusion, Vague and Ambiguous 37:24-38:1 - FRE 402, 403, Lack of Foundation 39:4-6, 39:10-12 - FRE 402, 403, 701, Calls for a Legal Conclusion, Vague and Ambiguous 41:15-16, 41:19-20 - FRE 403, Lack of Foundation, Vague and Ambiguous 41:22-24 - Lack of Foundation, Vague and Ambiguous 41:25, 42:3-5, 42:7-11 - FRE 105, 402, 403, Vague and Ambiguous</p>	<p>28:5-14; 31:2-12; 35:19-24; 37:5-23; 38:2-39:3; 45:8-19; 48:16-49:1; 51:5-15; 52:14-23; 88:12-90:21; 97:8-98:3; 101:2-20; 114:15-116:2; 117:10-119:8; 120:5-12; 131:20-133:9; 136:8-18; 139:3-23; 169:7-170:22; 172:9-173:25; 177:21-23; 181:16-182:8; 182:23-184:10; 186:1-12; 190:15-191:4; 192:2-193:19; 204:21-205:24; 207:7-19; 208:10-209:24; 212:14-213:12; 215:7-23</p>	<p>Objections: 28:5-14—Hearsay, FRE 801; Not needed for completeness 31:2-12—Hearsay, FRE 801; Not needed for completeness 35:19-24—Hearsay, FRE 801; Not needed for completeness 37:5-23—Relevance FRE 401, 402; Prejudice, FRE 403 38:2-39:3—Relevance FRE 401, 402; Prejudice, FRE 403 88:1-90:21—Relevance FRE 401, 402; Prejudice, FRE 403; No personal knowledge, Calls for speculation, FRE 602; Hearsay, FRE 801; Not necessary for completeness 114:25-116:2—Not needed for completeness; Hearsay, FRE</p>

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
<p>24; 102:2-4; 102:6-24; 103:2-9; 103:11-17; 103:20-104:4; 104:6-7; 104:10-16; 105:19-20; 105:23-24; 106:1-12; 106:15; 106:17-20; 106:23-24; 107:1-6; 107:9-10; 107:12-18; 108:5-10; 108:13-14; 108:16-18; 108:21; 108:24; 109:1-11; 109:1-11; 109:14; 109:16-17; 109:19-22; 109:24-110:7; 110:10-11; 110:13-111:1; 111:4-6; 111:8-10; 111:13-14; 111:16-112:4; 112:7-9; 112:11-13; 112:16-19; 112:21-22; 112:25-113-1; 113:3-12; 113:15-16; 113:18; 113:21-22; 113:24-114:2; 114:5-7; 114:9; 114:12-14; 119:9-10; 119:13-15; 119:17-18; 119:21-22; 119:24-25; 120:3-4; 120:13-14; 120:17-21; 130:9-131:19; 133:10-13; 133:16-21; 133:23-24; 134:2-4; 134:6-8; 134:11; 136:4-7; 136:19-21; 138:14-23; 139:1-2; 163:15-19; 166:16-167:6; 167:9-19; 171:11-172:8; 174:1-3; 174:6-8; 174:10-19; 174:22-23; 174:25-175:1; 175:4-13; 175:15-18; 175:21-23; 175:25-</p>	<p>42:12-13, 42:16-18 - FRE 105, Vague and Ambiguous 42:20-43:15 - FRE 105 43:16, 43:19-25 - FRE 105, Misstate Testimony, Lacks Foundation 44:2-3, 44:6-14 - FRE 105, 403, Lacks Foundation, Vague and Ambiguous, Misstates Testimony 44:16-18, 44:21-23 - FRE 105, 403, Misstate Testimony, Lacks Foundation, Vague and Ambiguous 45:20-23, 46:1-6 - FRE 403, 701, Calls for Legal Conclusion, Vague and Ambiguous 46:20-46:23 - Vague and Ambiguous 47:6-47:17 - FRE 402, 403 48:10-15 - Vague and Ambiguous, Lack of Foundation 49:2-18 - Lacks Foundation 50:12-51:4 - FRE 402, 403 51:16-17, 51:20-23, 51:25-52:4, 52:7-13 - FRE 403, 701, Calls for Legal Conclusion,</p>		<p>801; Speculation, FRE 602 117:10-119:8—Not necessary for completeness; Hearsay, FRE 801; Speculation, FRE 602 131:20-133:9—Speculation, FRE 602; Irrelevant, FRE 401, 402 139:3-23—Not necessary for completeness; Hearsay, FRE 801 169:7-170:22—Not necessary for completeness; Hearsay, FRE 801 204:21-205:24—Not necessary for completeness; Hearsay, FRE 801; FRE 401, 402, 403 208:10-209:24—FRE 401, 402, 403; Hearsay, FRE 801 <u>Counter Designations:</u> 193:23-194:5</p>

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
<p>176:16, 176:19-177:4, 177:6-8, 177:11-13, 177:15-20, 177:24-178:4, 178:7, 178:9-19, 178:22-179:3, 179:5-6, 179:8-9, 179:11, 179:14-16, 179:18-20, 179:23, 179:25-180:1, 180:4-7, 180:9-14, 180:17-18, 180:20-181:4, 181:7, 181:9-10, 181:13-15, 182:9-10, 182:14, 182:15-18, 182:20-22, 184:11-19, 184:22-185:2, 185:21-25, 187:25-188:9, 188:12-23, 188:25-189:3, 189:6-7, 189:9-20, 189:23-24, 190:1-9, 190:12-14, 191:15-22, 193:20-22, 196:11-13, 196:16, 196:23-197:6, 197:16-18, 197:21-23, 205:25-206:5, 206:20-22, 206:25-207:6, 207:20-22, 207:25-208:1, 208:3-9, 209:25-210:2, 210:6-16, 210:18-212:8, 212:11-13, 213:13-15, 213:18-24, 214:25-215:2, 215:5-6, 215:24-25, 216:3-4, 216:6-10, 216:13-14, 216:19-23, 217:1, 217:3-6, 217:9-11, 217:13, 217:15-16, 217:18-19, 217:22-23, 217:25, 218:3, 218:5-9, 218:12-13, 218:15-17, 218:20-</p>	<p>Vague and Ambiguous 52:24-53:1 - FRE 105, 402, 403, 701, Calls for Legal Conclusion, Vague and Ambiguous, Misstates Testimony 54:24-55:6, 55:9-15 - FRE 105, 402, 403, 701, Calls for Legal Conclusion, Vague and Ambiguous, Misstates Testimony 74:15-20, 74:23-25, 75:2-10, 75:13-14, 75:16-76:2 - FRE 105, 402, 403 76:2, 76:5-6 - FRE 105, 402, 403, Calls for Speculation 76:7-17 - FRE 105, 402, 403 76:18-24 - FRE 105, 402, 403, Calls for Speculation 76:25-77:6 - FRE 105, 402, 403, Asked and Answered 77:7-77:11 - FRE 105, 402, 403, Calls for Speculation, Vague and Ambiguous 77:12-78:4 - FRE 105, 402, 403, Lacks Foundation 78:5-78:13 - FRE 105, 402, 403, Vague and Ambiguous, Calls for Speculation</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
<p>21, 218:23-219:5, 219:8-9, 219:11-13, 219:16-17, 219:19-22, 219:25, 220:2-6, 220:9-10, 220:12-19, 220:22, 220:24-25, 220:3, 225:7-12, 225:15-17, 225:19-20, 225:23, 225:25-226:10, 226:13-14, 226:16-18, 226:20-21, 226:23-227:5, 227:8-10, 227:12-14, 227:17-18, 227:20-23, 228:1-3, 228:6-8, 228:10-11, 228:14-21</p>	<p>79:4-79:16 - FRE 105, 402, 403, Vague and Ambiguous 79:17-80:1 - FRE 105, 402, 403, Calls for Speculation, Vague and Ambiguous 80:2-80:8 - FRE 105, 402, 403 80:9-14 - FRE 105, 402, 403, Misstates Testimony, Lack of Foundation 80:15-80:25 - FRE 105, 402, 403 81:1-81:10 - FRE 105, 402, 403, 701, Calls for Legal Conclusion, Vague and Ambiguous 81:11-81:16 - FRE 105, 402, 403, Vague and Ambiguous 81:17-82:17 - FRE 105, 402, 403, Vague and Ambiguous, Calls for Speculation 82:18-82:21 - FRE 105, 402, 403 82:22-83:3 - FRE 105, 402, 403, Misstates Testimony, Lack of Foundation 83:4-86:7 - FRE 105, 402, 403 86:24-88:6, 88:9-11 - FRE 402, 403, Calls for Speculation, Lack of Foundation</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>96:15-19, 96:23-97:7 - FRE 105, 402, 403, Calls for Speculation, Lack of Foundation</p> <p>98:4-6, 98:9-10 - FRE 105, 402, 403, Calls for Speculation, Lack of Foundation, Vague and Ambiguous</p> <p>98:12-21, 98:24-99:3, 99:5-12, 99:15-21 - FRE 105, 402, 403, Calls for Speculation, Lack of Foundation</p> <p>99:23-100:14 - FRE 105, 402, 403, 802, Calls for Speculation, Lack of Foundation</p> <p>100:15-100:16, 100:19-101:1 - FRE 105, 402, 403, 802, Calls for Speculation, Lack of Foundation</p> <p>101:21-24, 102:2-4 - FRE 105, 402, 403, Calls for Speculation, Lack of Foundation, Misstates testimony, Vague and Ambiguous</p> <p>102:6-10 - FRE 105, 402, 403, Calls for Speculation, Lack of Foundation</p> <p>102:11-22 - FRE 105, 402, 403, 802, Calls for Speculation,</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>Lack of Foundation 102:23-24, 103:2-9, 103:11-15 - FRE 105, 402, 403, 802, Calls for Speculation, Lack of Foundation 103:16-17, 103:20-104:4 - FRE 105, 402, 403, Calls for Speculation, Lack of Foundation 104:6-7, 104:10-16 - FRE 105, 402, 403, Lack of Foundation, Vague and Ambiguous 105:19-20, 105:23-24, 106:1- 12, 106:15 - FRE 105, 402, 403, 701, Calls for Legal Conclusion, Vague and Ambiguous 106:17-20, 106:23-24, 107:1-6, 107:9-10 - FRE 105, 402, 403, 701, 802, Calls for Speculation, Lack of Foundation, Asked and Answered, Calls for Legal Conclusion 107:12-18 - FRE 105, 402, 403, 701, Calls for Speculation, Lack of Foundation, Asked and Answered, Calls for Legal Conclusion, Vague and Ambiguous</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>108:5-8 - FRE 105, 402, 403, 802, Calls for Speculation, Lack of Foundation</p> <p>108:8-10, 108:13-14, 108:16-18, 108:21, 108:24, 109:1-11, 109:14, 109:16-17, 109:19-22 - FRE 105, 402, 403, Calls for Speculation, Lack of Foundation</p> <p>109:24-110:7, 110:10-11, 110:13-18 - FRE 105, 402, 403, Calls for Speculation, Lack of Foundation</p> <p>110:19-24 - FRE 105, 402, 403, 802, Calls for Speculation, Lack of Foundation</p> <p>110:25-111:1, 111:4-6, 111:8-10, 111:13-14, 111:16-20 - FRE 105, 402, 403, Calls for Speculation, Lack of Foundation</p> <p>111:21-112:1 - FRE 105, 402, 403, 802, Calls for Speculation, Lack of Foundation</p> <p>112:2-112:4, 112:7-9, 112:11-13, 112:16-19, 112:21-22, 112:25-113:1, 113:3-12, 113:15-16, 113:18, 113:21-22, 113:24-114:2, 114:5-7, 114:9,</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>114:12-14 - FRE 105, 402, 403, Calls for Speculation, Lack of Foundation, Incomplete Hypothetical</p> <p>119:9-10, 119:13-15, 119:17-18, 119:21-22, 119:24-25, 120:3-4, 120:13-14, 120:17-21 - FRE 105, 402, 403, Lack of Foundation, Incomplete, Calls for Speculation</p> <p>130:9-131:19, 133:10-13, 133:16-21, 133:23-24, 134:2-4, 134:6-8, 134:11 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation</p> <p>136:4-7, 136:19-21 - FRE 105, 402, 403, 602, Lack of Foundation, Calls for Speculation</p> <p>138:14-23, 139:1-2 - FRE 105, 402, 403, 602, 802, Lack of Foundation, Calls for Speculation</p> <p>163:15-19, 166:16- FRE 105, 402, 403, 602, Lack of Foundation, Calls for Speculation</p> <p>166:21-167:4 - FRE 105, 402, 403, 602, 802, Lack of</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>Foundation, Calls for Speculation 167:5-6, 167:9-19 - FRE 105, 402, 403, 602, Lack of Foundation, Calls for Speculation 171:11-172:8 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation 174:1-3, 174:6-8 - FRE 105, 402, 403, Lack of Foundation, Vague and Ambiguous, Calls for Speculation 174:10-19, 174:22-23, 174:25-175:1, 175:4-13 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation 175:15-18, 175:21-23, 175:25-176:16, 176:19-177:4, 177:6-8, 177:11-13 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation 177:15-20, 177:24-178:1 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation 178:2-178:4, 178:7, 178:9-19, 178:22-179:3, 179:5-6, 179:8-9 - FRE 105, 402, 403, Lack of</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>Foundation, Calls for Speculation, Calls for Legal Conclusion 179:11, 179:14-16 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation, Asked and Answered 179:18-20, 179:23, 179:25-180:1, 180:4-7, 180:9-14, 180:17-18, 180:20-181:4, 181:7, 181:9-10, 181:13-15 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation, Asked and Answered, Misstates Testimony 182:9-10, 182:14-18, 182:20-22 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation, Asked and Answered, Misstates Testimony, Incomplete Hypothetical 184:11-19, 184:22-185:2 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation 185:21-25, 187:25-188:9, 188:12-23, 188:25-189:3,</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>189:6-7 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation, Calls for Legal Conclusion</p> <p>189:9-20, 189:23-24 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation</p> <p>190:1-9, 190:12-14 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation, Calls for Legal Conclusion</p> <p>196:11-13, 196:16, 196:23-197:6 - FRE 403, Calls for Speculation</p> <p>197:16-18, 197:21-23 - FRE 403, Vague and Ambiguous</p> <p>205:25-206:5 - FRE 403, Vague and Ambiguous, Calls for a Legal Conclusion</p> <p>206:20-22, 206:25-207:6 - FRE 403, 701, Calls for Legal Conclusion</p> <p>207:20-22, 207:25-208:1, 208:3-9 - FRE 402, 403, Vague and Ambiguous</p> <p>209:25-210:2, 210:6-16, 210:18-212:8, 212:11-13 - FRE 403, 701, Calls for Legal</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>Conclusion 213:13-15, 213:18-24 - FRE 403, Misstates Testimony, Lack of Foundation 214:25-215:2, 215:5-6 - FRE 402, 403, Misstates Testimony, Lack of Foundation, Calls for Speculation 215:24-25, 216:3-4, 216:6-10, 216:13-14, 216:19-23, 217:1 - FRE 402, 403, Lack of Foundation 217:3-6, 217:9-11, 217:13, 217:15-16 - FRE 402, 403, Lack of Foundation, Calls for Speculation 217:18-19, 217:22-23 - FRE 402, 403, Lack of Foundation 217:25, 218:3, 218:5-9, 218:12-13 - FRE 402, 403, Lack of Foundation, Calls for Speculation 218:15-17, 218:20-21, 218:23-219:5, 218:23-219:5, 219:8-9, 219:11-13, 219:16-17, 219:19-22, 219:25, 220:2-6, 220:9-10, 220:12-17 - FRE 402, 403, Lack of Foundation, Calls for Speculation</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	220:18-19, 220:22, 220:24-25, 221:3 - FRE 402, 403, Lack of Foundation, Calls for Speculation, Misstates Testimony 225:7-12, 225:15-17 - FRE 402, 403, Lack of Foundation, Calls for Speculation 225:19-20, 225:23, 225:25-226:10, 226:13-14, 226:16-18, 226:20-21 - FRE 402, 403, Lack of Foundation, Calls for Speculation, Misstates Testimony 226:23-227:5, 227:8-10, 227:12-14, 227:17-18 - FRE 402, 403, Lack of Foundation 227:20-23, 228:1-3 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous 228:6-8, 228:10-11 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous, Misstates Testimony 228:14-21 - FRE 105, 402, 403		
Michael McKibben testimony 2			
240:14-16; 241:13-17; 241:22-24; 243:2-10; 243:13-14;	240:14-16, 241:13-17, 241:22-24, 243:2-8 - FRE 402, 403,	246:17-247:15; 249:22:250:4; 250:14-25; 260:17-261:6;	Objections: 246:17-247:15—Cannot rely

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
<p>243:16-244:7; 244:10-11; 244:13-20; 244:24-245:11; 245:14-16; 245:18-246:16; 249:4-21; 250:5-7; 250:10-13; 251:1-5; 259:5-8; 259:11-15, 259:18-19, 260:3-11, 260:14- 16, 261:7-21, 261:24-25, 262:2-4, 262:7-18, 263:18-20, 263:23-264:9, 266:11-13, 266:16-17, 266:19-21, 266:24- 25, 267:2-6, 268:10-15, 269:11-20, 269:23-24, 270:1- 271:13, 283:23-284:4, 285:3-5, 285:9-12, 285:14-19, 285:22- 24, 292:11-12, 292:15-16, 292:18-21, 292:24, 293:3-4, 293:6-7, 293:10, 293:12-15, 295:15-23, 296:22-297:7, 297:12-13, 297:25-298:4, 298:8-10, 298:12-16, 298:19- 20, 298:22-25, 299:3-9, 306:24-307:1, 307:4-5, 307:7- 11, 307:14-16, 307:19-21, 307:24-308:1, 308:3-9, 308:12- 16, 308:18-20, 308:23, 309:24- 310:9, 310:12-14</p>	<p>Lack of Foundation, Calls for Speculation 243:9-10, 243:13-14 - FRE 402, 403, Lack of Foundation, Calls for Speculation, Calls for Legal Conclusion, Vague and Ambiguous 243:16-244:7, 244:10-11, 244:13-16 - FRE 402, 403, Lack of Foundation, Calls for Speculation, Vague and Ambiguous 244:17-20, 244:24-245:8 - FRE 105, 402, 403, Lack of Foundation 245:9-10, 245:14-16, - FRE 105, 402, 403, Vague and Ambiguous, Calls for Speculation 245:18-245:21 - FRE 105, 402, 403, Calls for Speculation 245:22-25 - FRE 403 246:1-246:16 - FRE 402, 403, Calls for Speculation 249:4-21 - FRE 403, Calls for Speculation, Lack of Foundation 250:5-7, 250:10-13 - FRE 402, 403</p>	<p>262:19-263:17; 267:7-11; 267:18-24; 290:4-292:10; 295:24-296:21; 299:10-15; 308:25-309:7</p>	<p>since did not disclose privilege materials 250:14-25—Cannot use because did not provide attorney opinion 295:24-296:21—Irrelevant, FRE 401, 402; Lacks personal knowledge, FRE 602, Non responsive 308:25-309:7—Not necessary for completeness; Hearsay, FRE 801 <u>Counter Designations:</u> 280:20-23; 280:25-281:3</p>

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>251:1-5 - FRE 402, 403, 501, Vague and Ambiguous 251:5-8 - FRE 402, 403, Lack of Foundation 259:11-15, 259:18-19, 260:3-11, 260:14-160, 261:7-10 - FRE 402, 403, Lack of Foundation, Calls for Speculation 261:11-21, 261:24-25 - FRE 402, 403, Lack of Foundation 262:2-4, 262:7-18, 263:18-20, 263:23-264:9 - FRE 402, 403, Lack of Foundation, Calls for Speculation, Calls for Legal Conclusion 266:11-13, 266:16-17, 266:19-21, 266:24-25, 267:2-6 - FRE 402, 403, Lack of Foundation, Calls for Speculation 268:10-15, 269:11-20, 269:23-24, 270:1-271:13 - FRE 402, 403, Lack of Foundation, Calls for Speculation 285:3-5, 285:9-12, 285:14-19, 285:22-24 - FRE 403, 701, Calls for Legal Conclusion, Vague and Ambiguous 292:11-12, 292:15-16, 292:18-</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>21, 292:24, 293:3-4, 293:6-7, 293:10, 293:12-15 - FRE 402, 403, Lack of Foundation, Calls for Speculation</p> <p>297:4-7, 297:12-13 - FRE 402, 403, Calls for Legal Conclusion, Vague and Ambiguous</p> <p>297:25-298:4, 298:8-10, 298:12-16, 298:19-20, 298:22-25, 299:3-9 - FRE 402, 403, Lack of Foundation, Misstates Testimony</p> <p>306:24-307:1, 307:4-5, 307:7-11, 307:14-16, 307:19-21, 307:24-308:1 - FRE 105, 402, 403, Lack of Foundation, Calls for Speculation</p> <p>308:3-9, 308:12-16 - FRE 105, 402, 403, Misstates Testimony, Lack of Foundation</p> <p>308:18-20, 308:23 - FRE 105, 402, 403, 701, Lack of Foundation</p> <p>309:24-310:1 - FRE 105, 402, 403, Vague and Ambiguous, Calls for a Legal Conclusion</p> <p>310:2-310:6 - FRE 105, 402, 403, Misstates Testimony</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
Jonathon Piurko testimony			
62:14-17, 62:19-23, 78:14-25, 79:2-17, 79:19, 79:25, 80:2-25, 81:2, 82:11-25, 83:2, 83:4-6, 83:8-22, 83:24-25, 84:2-3	310:7-310:9, 310:12-14 - FRE 105, 402, 403, Misstates Testimony, Lack of Foundation	62:8-13	<p>Objections: Hearsay, FRE 801; Not needed for completeness</p> <p>Counter Designations: 51:19-52:3; 61:21-62:7</p>
Sol Alan Saad testimony			
41:10-11, 41:18-44:4, 47:22-51:10, 101:2-14	62:14-17, 62:19-23 - FRE 402, 403, 501, 802, Lack of Foundation, Calls for Speculation 78:14-25, 79:2-17, 79:19 - FRE 402, 403, 501, 602, 802, Lack of Foundation 79:25, 80:2-25, 81:2 - FRE 402, 403, 501, 802, Lack of Foundation 82:11-25, 83:2, 83:4-6, 83:8-21 - FRE 402, 403, 501, Lack of Foundation 83:22, 83:24-25, 84:2-3 - FRE 402, 403, 501, 802, Lack of Foundation	No Counter-designations	
41:10-11, 41:18-44:4 - FRE 402, 403, 802, Lack of Foundation 47:22-48:14 - FRE 402, 403, 501, 802, Lack of Foundation 48:15-49:7 - FRE 402, 403 49:8-51:6 - FRE 402, 403, 501,			

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>802</p> <p>51:7-51:10 - FRE 402, 403, Lack of Foundation</p> <p>101:2-14 - FRE 402, 403, 501, Lack of Foundation</p>		
James Sobwick testimony			
<p>10:8-15, 12:8-20, 41:17-42:3, 51:24-52:15, 52:17, 52:19-53:21, 53:23, 53:25-55:24, 56:1-3, 56:5-58:18, 62:4-19, 63:9-23, 66:7-22, 66:24, 67:1-69:21, 69:24-71:4, 90:11-92:2, 92:10-17, 92:19, 92:21-93:9, 96:8-20, 97:5-18, 99:5-11, 100:3-14, 100:18-101:3, 102:3-14, 104:2-13, 105:17-106:13, 113:4-7, 121:18-122:16, 134:18-24, 143:18-25, 199:6-12, 203:25-204:3, 204:5-7, 204:9-205:5, 205:7-9</p>	<p>41:17-41:20 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous</p> <p>41:21-42:3 - FRE 402, 403, Lack of Foundation</p> <p>52:4-7 - FRE 402, 403, 701, Lack of Foundation, Calls for Legal Conclusion, Vague and Ambiguous, Calls for Speculation</p> <p>52:8-52:12 - FRE 402, 403, 501, Lack of Foundation</p> <p>52:13-15, 52:17 - FRE 402, 403, 602, 701, Lack of Foundation, Calls for Legal Conclusion, Vague and Ambiguous, Calls for Speculation</p> <p>52:19-53:9 - FRE 402, 403, 602, Lack of Foundation, Calls for Legal Conclusion, Vague and Ambiguous, Calls for</p>	<p>92:3-9; 100:15-17; 101:4-102:2; 112:8-113:3; 113:8-10</p>	<p>Counter Designations:</p> <p>113:11-12</p>

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>Speculation 53:10-53:21, 53:23, 53:25-54:5 - FRE 402, 403, 602, 701, Lack of Foundation, Calls for Legal Conclusion, Vague and Ambiguous, Calls for Speculation, Misstates Testimony 54:6-55:1 - FRE 402, 403, 602, 701, Lack of Foundation, Calls for Legal Conclusion, Vague and Ambiguous, Calls for Speculation 55:24-13 - FRE 402, 403, 602, Lack of Foundation, Vague and Ambiguous, Calls for Speculation 55:14-16 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous 55:17-3, 56:5-58:18 - FRE 402, 403, 602, Lack of Foundation, Vague and Ambiguous, Calls for Speculation 62:4-9 - FRE 402, 403, 602, Lack of Foundation, Vague and Ambiguous, Calls for Speculation, Misstates Testimony</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>62:10-19 - FRE 402, 403, 602, Lack of Foundation, Vague and Ambiguous, Calls for Speculation</p> <p>63:9-23 - FRE 105, 402, 403, Lack of Foundation, Vague and Ambiguous</p> <p>66:7-13 - FRE 105, 402, 403, Lack of Foundation, Vague and Ambiguous</p> <p>66:14-22, 66:24 - FRE 105, 402, 403, 701, Lack of Foundation, Vague and Ambiguous, Calls for Legal Conclusion</p> <p>67:1-67:23 - FRE 105, 402, 403, 701, Lack of Foundation, Vague and Ambiguous, Calls for Legal Conclusion</p> <p>67:24-69:16 - FRE 105, 402, 403, 701, Lack of Foundation, Vague and Ambiguous, Calls for Legal Conclusion, Misstates Testimony</p> <p>69:16-69:21 - FRE 105, 402, 403, 701, Lack of Foundation, Vague and Ambiguous, Calls for Legal Conclusion</p> <p>69:24-71:4 - FRE 105, 402,</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>403, Lack of Foundation, Vague and Ambiguous 90:11-91:1 - FRE 105, 402, 403, Lack of Foundation, Vague and Ambiguous 91:2-91:11 - FRE 402, 403, 602, Lack of Foundation, Calls for Speculation 91:22-92:2, 92:10-15 - FRE 402, 403, 602, Lack of Foundation, Calls for Speculation 92:16-17, 92:19, 92:21-93:9 - FRE 402, 403, 602, 701, Lack of Foundation, Vague and Ambiguous, Calls for Speculation, Calls for Legal Conclusion 96:8-12 - FRE 602, 701, Lack of Foundation, Calls for Speculation, Calls for Legal Conclusion 96:13-17 - FRE 105, 403, 602, Lack of Foundation, Calls for Speculation, Vague and Ambiguous 96:18-20 - FRE 602, 701, Lack of Foundation, Calls for Speculation, Vague and</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>Ambiguous, Calls for Legal Conclusion 97:5-12 - FRE 105, 402, 403, 602, Lack of Foundation, Calls for Speculation 97:13-15 - FRE 105, 602, 701, Lack of Foundation, Calls for Speculation, Calls for Legal Conclusion, Vague and Ambiguous 97:16-18 - FRE 105, 402, 403, 602, Lack of Foundation, Calls for Speculation, Vague and Ambiguous 99:5-11 - FRE 403, 602, Lack of Foundation 100:3-14, 100:18-101:3 - FRE 403, 602, Lack of Foundation 102:3-14 - FRE 403, 602, Lack of Foundation, Misstates Testimony 104:2-13 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous 105:17-106:13 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous, Calls for Speculation 113:4-7 - FRE 402, 403, 501,</p>		

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	Lack of Foundation, Vague and Ambiguous 121:18-122:16 - FRE 403, 501, 802, Lack of Foundation 134:18-24 - FRE 403, 501, 802, Lack of Foundation 143:18-25 - FRE 403, 501, Misstates Testimony, Lack of Foundation 199:6-12 - FRE 403, 501, 602, Lack of Foundation, Vague and Ambiguous 203:25-204:3, 204:5-7, 204:9-205:5, 205:7-9 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous, Calls for Speculation		
Ryan Strong testimony			
24:24-25, 25:1-26:3, 33:18-34:5, 35:8-36:4	24:24-25, 25:1-26:3 - FRE 402, 403, 501, 802, Lack of Foundation 33:18-34:5 - FRE 402, 403, 501, 802, Lack of Foundation 35:8-36:4 - FRE 402, 403, 501, 802, Lack of Foundation	34:6-10	<u>Objections:</u> Relevance, FRE 401, 402; Not needed for completeness
David Tierney testimony			
18:9-19:10, 21:8-22:4, 22:6-23:14, 26:5-6, 26:8-27:24,	18:9-19:10 - FRE 402, 403, 802, Lack of Foundation	23:15-25:10; 50:17-24	<u>Objections:</u> 23:15-25:10—Relevance, FRE

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
<p>50:25-52:23, 71:7-72:19</p>	<p>21:8-22:4, 22:6-15 - FRE 402, 403, 802, Lack of Foundation 22:16-23:14 - FRE 402, 403, Lack of Foundation 26:5-6, 26:8-27:24 - FRE 402, 403, Lack of Foundation 50:25-52:23 - FRE 402, 403, Lack of Foundation 71:7-72:6 - FRE 402, 403, Lack of Foundation 72:7-72:19 - FRE 402, 403, 802, Lack of Foundation</p>		<p>401, 402; Lacks Foundation, Confusion, FRE 403; Not needed for completeness 50:17-24—Cumulative, FRE 403; Lack of personal knowledge, FRE 602; Hearsay FRE 802; Not needed for completeness <u>Counter Designations:</u> 25:11-13; 47:23-49:16; 50:6-16; 86:87-20</p>
<p>Keith Voigts</p>			
<p>19:23-20:9, 24:9-16, 28:9-18, 29:5-10, 29:16-21, 37:1-38:2, 46:1-51:21, 53:2-18, 54:22-61:24, 64:18-65:18, 66:1, 88:6-90:15, 91:8-93:6, 93:12-94:14, 97:10-98:15, 102:20-22, 102:24, 109:7-17</p>	<p>28:9-11 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous 28:12-18 - FRE 403, Lack of Foundation, Vague and Ambiguous, Calls for a Legal Conclusion 29:5-10 - FRE 403, 602, 701, Lack of Foundation, Vague and Ambiguous, Calls for a Legal Conclusion 29:12-14, 16-21 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous 37:1-38:2 - FRE 402, 403, Lack</p>	<p>24:17-21; 28:19-29:4; 29:11-15; 51:22-53:1; 53:19-54:7; 90:16-19; 97:2-9; 102:5-19; 102:25-103:4</p>	<p><u>Objections:</u> 29:11-15—Relevance, FRE 401, 402; Lacks Foundation, FRE 602; Confusion, Waste of Time, FRE 403; Not needed for completeness 53:19-54:7—Cumulative, FRE 403; Not needed for completeness 97:2-9—Waste of Time, Cumulative FRE 403; Not needed for completeness 102:5-19—Waste of time,</p>

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
<p>of Foundation, Calls for Speculation 46:1-47:6 - FRE 403, Lack of Foundation, Vague and Ambiguous 47:7-50:6 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous 50:7-50:21 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous 50:22 - 51:21 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous, Misstates Testimony 53:2-18 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous 54:22-60:2 - FRE 402, 403, 802, Lack of Foundation, Vague and Ambiguous, Misstates Testimony 60:3-61:24 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous 64:18-65:18 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous, Calls for Speculation</p>			<p>Confusion, Cumulative, FRE 403; Not needed for completeness 102:25-103:4—Cumulative, FRE 403; Not needed for completeness <u>Counter Designations:</u> 62:4, 62:18-64:4, 69:19-21, 70:19-22, 71:1-2, 71:13-72:10, 73:23-74:11, 94:15-19</p>

EXHIBIT C3

Deposition Designations

Facebook's Designations	Leader's Objections	Leader's Counter-designations	Facebook's Objections to Counter-designations
	<p>66:1 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous, Calls for Speculation, Incomplete</p> <p>88:6-88:7 - FRE 402, 403, Lack of Foundation, Vague and Ambiguous</p> <p>88:8-89:5 - FRE 403, 701, Lack of Foundation, Vague and Ambiguous, Calls for a Legal Conclusion</p> <p>89:6-90:15 - FRE 403, 602, 701, Lack of Foundation, Vague and Ambiguous, Calls for a Legal Conclusion, Calls for Speculation</p> <p>91:8-93:6 - FRE 403, Lack of Foundation</p> <p>93:12-94:14 - FRE 403, Lack of Foundation, Asked and Answered</p> <p>97:10-98:15 - FRE 403, 802, Lack of Foundation</p> <p>102:20-22, 102:24 - FRE 402, 403, Lack of Foundation</p> <p>109:7-17 - FRE 403, Lack of Foundation</p>		