

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TIMELINES, INC.)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 11 CV 6867
)	
FACEBOOK, INC.)	HONORABLE JOHN W. DARRAH
)	
Defendant.)	

**DEFENDANT FACEBOOK, INC.’S MOTION *IN LIMINE*
TO PROTECT FROM PUBLIC DISCLOSURE HIGHLY CONFIDENTIAL DATA
CONTAINED IN TWO SPREADSHEETS PRODUCED BY FACEBOOK**

In furtherance of the parties’ stipulated agreement, Defendant Facebook, Inc. (“Facebook”) hereby moves this Court to order the following relief to protect highly sensitive and confidential revenue, click, and impression data contained in two spreadsheets produced by Facebook:

1. Pursuant to an agreement between counsel for the parties, the revenue, click, and impression data relating to specific Facebook ad products and contained in FB_TL_00011912 and FB_TL_00011919 (“the Spreadsheets”) will be redacted from any exhibits used at the trial of this matter by either party.
2. At trial, exhibits and demonstrative displays with information from the redacted versions of the Spreadsheets (*i.e.*, revenue, click, and impression data not specific to particular Facebook ad products) may be disclosed to: (a) the Court and its personnel; (b) the jury; (c) Timelines’ President and corporate representative; and (d) the parties’ respective experts and witnesses, as necessary.
3. The Court will not include the redacted exhibits or demonstrative displays, or testimony about the highly confidential revenue, click, and impression data contained in the Spreadsheets, in its publicly available records or otherwise make such data publicly available.
4. After trial, Timelines will continue to treat the revenue, click, and impression data in the Spreadsheets as “Highly Confidential – Outside Counsel Only” pursuant to the terms of the Protective Order and the non-disclosure agreement executed by Timelines’ President.

In support of its motion, Facebook submits the accompanying memorandum and the parties’ stipulated agreement. Facebook respectfully requests that this Court grant this motion.

Dated: February 20, 2013

Respectfully submitted,

COOLEY LLP

By: /s/ Brendan J. Hughes
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Counsel for Facebook, Inc.

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he served the foregoing **DEFENDANT FACEBOOK, INC.'S MOTION IN LIMINE TO PROTECT FROM PUBLIC DISCLOSURE HIGHLY CONFIDENTIAL DATA CONTAINED IN TWO SPREADSHEETS PRODUCED BY FACEBOOK** by means of the Court's CM/ECF System, which causes a true and correct copy of the same to be served electronically on all CM/ECF registered counsel of record, on February 20, 2013.

Dated: February 20, 2013

/s/ Brendan J. Hughes _____
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