

Exhibit A

WHEREAS, the highly confidential data contained in the Spreadsheets was relied upon in, and used as exhibits to, reports prepared by damages experts for both Timelines and Facebook; and

WHEREAS, the parties have agreed to preserve the confidentiality of the highly confidential data contained in the Spreadsheets, but also allow for the use of the information in redacted format at the trial of this matter.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Timelines and Facebook, as follows:

1. Pursuant to an agreement between counsel for the parties, revenue, click, and impression data relating to specific Facebook ad products and contained in 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 (specifically including 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 representatives; 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 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 NDA executed by Timelines' President.

5. The effect of this Stipulation is strictly limited to the matters so stipulated.

Dated: February 20, 2013

Respectfully submitted,

COOLEY LLP


By: 
Peter J. Willsey (*pro hac vice*)
Brendan Hughes (*pro hac vice*)
COOLEY LLP
1299 Pennsylvania Ave., NW Suite 700
Washington, DC 20004
Phone: (202) 842-7800
Fax: (202) 842-7899
Email: pwillsey@cooley.com
bhughes@cooley.com

Michael G. Rhodes (*pro hac vice*)
101 California Street, 5th Floor
San Francisco, CA 94111-5800
Telephone: (415) 693-2000
Facsimile: (415) 693-2222
Email: rhodesmg@cooley.com

Steven D. McCormick (#1824260)
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654-3406
Tel: (312) 862-2000
Fax: (312) 862-2200
Email: smccormick@kirkland.com

Counsel for Facebook, Inc.

REED SMITH LLP

By: 
James N. Hultquist (SBN 6204320)
Douglas A. Albritton (SBN 6228734)
Michael L. DeMarino (SBN 6298337)
Bruce R. Van Baren (SBN 6310375)
REED SMITH LLP
10 South Wacker Drive
Chicago, IL 60606-7507
Tel: (312) 207-1000
Fax: (312) 2-7-6400

Counsel for Timelines, Inc.