Exhibit A

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.	Hon. John W. Darrah
Defendant.	<i>)</i>

JOINT STIPULATION TO KEEP CERTAIN FINANCIAL INFORMATION CONFIDENTIAL AT TRIAL

WHEREAS, Plaintiff Timelines, Inc. ("Timelines") requested that this Court provide it with relief from the Protective Order entered in this proceeding to allow Timelines' President and corporate representative to view certain spreadsheets (Bates Nos. FB_TL_0011912 and FB_TL_0011919) containing revenue, click, and impression data produced by Defendant Facebook, Inc. ("Facebook") and designated as "Highly Confidential – Outside Counsel Only" pursuant to the terms of the Protective Order (the "Spreadsheets") (Dkt. Nos. 76, 78);

WHEREAS, Facebook opposed Timelines' request for relief from the Protective Order but also proposed that Timelines be permitted to review portions of the highly confidential financial data contained in the Spreadsheets upon executing a non-disclosure agreement (Dkt. No. 84);

WHEREAS, on February 6, 2013, this Court granted Timelines' request for relief from the Protective Order subject to Timelines' President executing a non-disclosure agreement and also ordered that Facebook file a motion *in limine* to request protection of the highly confidential data at trial (Dkt. No. 91; Tr. of Proceedings Before the Honorable John H. Darrah, Feb. 6, 2012);

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,

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