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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

Case No. 5:12-MD-2314-EJD

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

**JOINT DECLARATION OF STEPHEN G.
GRYGIEL AND DAVID A. STRAITE IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS**

Judge: Hon. Edward J. Davila
Courtroom: 4—5th Floor
Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

We, David A. Straite and Stephen G. Grygiel, jointly declare and state as follows:

1. I, David A. Straite, am a member of the bars of the States of New York, Delaware, Pennsylvania, New Jersey and District of Columbia and admitted to practice before this Court *pro hac vice*. I am a partner with the firm of DiCello Levitt Gutzler LLC.

2. I, Stephen G. Grygiel, am a member of the bars of the States of Maine, Massachusetts, Delaware, Maryland and New York, and admitted to practice before this Court *pro hac vice*. I am the founder of Grygiel Law LLC and, relevantly for this case, was formerly a partner in and then *of counsel* to Silverman Thompson Slutkin White and before that a partner in the law firm of Keefe Bartels.

3. We are co-lead counsel for the Settlement Class Representatives Plaintiffs and the Settlement Class. We have personal knowledge of the facts stated herein and of the claims, defenses, and proceedings in this case. If called as witnesses, we would and could competently testify thereto.

4. We respectfully submit this joint declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement and Plaintiffs' Motion for Fees, Expenses and Service Awards, both filed August 23, 2022.

EXHIBITS

5. Attached hereto as **Exhibit 1** is a true and correct copy of the Declaration of Steven Weisbrot of Angeion Group, the Court-approved Claims Administrator, regarding status of implementation of the Notice Plan, including the following exhibits thereto:

- a. Exhibit 1A: copy of the email notice.
- b. Exhibit 1B: copies of the digital banner advertisements and social media advertisements.
- c. Exhibit 1C: copies of the sponsored listings.
- d. Exhibit 1D: list of people requesting exclusions.

6. Attached hereto as **Exhibit 2** is a true and correct copy of the [Proposed] Order of Final Approval, the same as the Word version to be emailed to the Court.

7. Attached hereto as **Exhibit 3** is a true and correct copy of the [Proposed] Final Judgment, the same as the Word version to be emailed to the Court.

8. Attached hereto as **Exhibit 4** is a true and correct copy of the Declaration of Jason “Jay” Barnes of Simmons Hanly Conroy LLC, Chair of the Plaintiffs’ Executive Committee.

9. Attached hereto as **Exhibit 5** is a true and correct copy of the Declaration of Margery Bronster of Bronster Fujichaku Robbins, Chair of the Settlement/AG Committee.

10. Attached hereto as **Exhibit 6** is a true and correct copy of the Declaration of William H. “Billy” Murphy, Jr. of Murphy Falcon Murphy, Member of the Plaintiffs’ Executive Committee and Chair of the Expert Committee.

11. Attached hereto as **Exhibit 7** is a true and correct copy of the Declaration of Barry Eichen of Eichen Crutchlow Zaslow LLP, Member of the Plaintiffs’ Executive Committee.

12. Attached hereto as **Exhibit 8** is a true and correct copy of the Declaration of Paul Kiesel of Kiesel Law LLP, Member of the Plaintiffs’ Executive Committee.

13. Attached hereto as **Exhibit 9** is a true and correct copy of the Declaration of Stephen Gorny of Gorny Dandurand, LC, Member of the Plaintiffs’ Executive Committee.

14. Attached hereto as **Exhibit 10** is a true and correct copy of the Declaration of James Frickleton of Bartimus Frickleton Robertson Rader, Member of the Plaintiffs’ Executive Committee.

15. Attached hereto as **Exhibit 11** is a true and correct copy of the Declaration of William M. Cunningham, Jr. of Burns, Cunningham & Mackey, P.C., Member of the Plaintiffs’ Executive Committee.

16. Attached hereto as **Exhibit 12** is a true and correct copy of the Declaration of Andrew J. Lyskowski of Bergmanis Law Firm LLC, Member of the Plaintiffs’ Executive Committee.

17. Attached hereto as **Exhibit 13** is a true and correct copy of the Declaration of Kim Richman, State Court Counsel in the parallel State Court Action.

1 18. Attached hereto as **Exhibit 14** is a true and correct copy of the Declaration of Eric
2 Lansverk, counsel to Settlement Class Representative Matthew Vickery.

3 19. Attached hereto as **Exhibit 16** is a true and correct copy of the Declaration of
4 Settlement Class Representative Perrin Davis.

5 20. Attached hereto as **Exhibit 17** is a true and correct copy of the Declaration of
6 Settlement Class Representative Dr. Brian Lentz.

7 21. Attached hereto as **Exhibit 18** is a true and correct copy of the Declaration of
8 Settlement Class Representative Cynthia Quinn.

9 22. Attached hereto as **Exhibit 19** is a true and correct copy of the Declaration of
10 Settlement Class Representative Matthew Vickery.

11 23. Attached hereto as **Exhibit 20** is a true and correct copy of the Declaration of
12 Settlement Class Representative Ryan Ung (State Court Action).

13 24. Attached hereto as **Exhibit 21** is a true and correct copy of the Declaration of
14 Settlement Class Representative Chi Cheng (State Court Action).

15 25. Attached hereto as **Exhibit 22** is a true and correct copy of the Declaration of
16 Settlement Class Representative Alice Rosen (State Court Action).

17 26. Attached hereto as **Exhibit 23** is a true and correct copy of Cynthia J. LaRose and
18 Natalie A. Prescott, *Facebook to Pay \$90 Million to Settle Data Privacy Lawsuit*, NATIONAL LAW
19 REVIEW, Vol. XII, No. 49 (Feb. 18, 2022).

20 27. Attached hereto as **Exhibit 24** is a true and correct copy of Mike Swift, *Latest*
21 *Facebook Privacy Settlement has Significance Beyond the Numbers*, MLEX (Feb. 16, 2022).

22 28. Attached hereto as **Exhibit 25** is a true and correct copy of Mayank Sharma, *Meta's*
23 *Settlement Could Be the Beginning of the End of Tracking Cookies*, LIFEWIRE (Feb. 17, 2022).

24 29. Attached hereto as **Exhibit 26** is a true and correct copy of Paul Bond and Mark S.
25 Melodia, *Facebook Stops Fighting Wiretap Act Litigation After More Than a Decade*, HOLLAND &
26 KNIGHT CYBERSECURITY AND PRIVACY BLOG (Feb. 18, 2022).

30. Attached hereto as **Exhibit 27** is a true and correct copy of a summary of report of lodestar across the case (including hours and hourly rate) reported by Settlement Class Counsel and Supreme Court Counsel as shown in the declarations above; for Lead Counsel the hours and hourly rates are supported below. For attorneys still working on the case, the hourly rate is the current hourly rate. For former attorneys, lodestar reflects historical rates. Hours and lodestar are reported here by timekeeper, by firm.

31. Attached hereto as **Exhibit 28** is a true and correct copy of the lodestar reported in the preceding paragraph and Exhibit 27 thereto, but organized by task code. "Task Codes" are ABA Litigation Task Codes, assigned to each entry by DiCello Levitt paralegal Sharon Banks to ensure uniformity across the case, under the supervision of David Straite and Steve Grygiel.

32. Attached hereto as **Exhibit 29** is a true and correct copy of lodestar reported in paragraph 30 and Exhibit 27 thereto, but organized by year. For time reported in 2012, the report separates reported time from January 1, 2012 through April 2, 2012 (added to "pre-consolidation time") and from April 3, 2012 through December 31, 2012 (added to "post-consolidation time"). "Consolidation" here means the Courts' order consolidating the related cases with and into MDL 2314.

33. Attached hereto as **Exhibit 30** is a true and correct copy of the summary report of all unreimbursed expenses incurred in this case from inception, based on the declarations included above and in the paragraphs below for firms affiliated with us.

34. Attached hereto as **Exhibit 31** is a true and correct copy of the [Proposed] Order Granting Motion for Fees, Expenses and Service Awards.

ADDITIONAL FACTS REGARDING WORK PERFORMED

35. The following is a non-exhaustive summary of the work in which we have been directly, substantially and personally involved:

- a. Researching and drafting an initial pre-consolidation Complaint;
- b. Working with co-counsel to develop a consensually-ordered case leadership structure that would most efficiently serve the class's interests;

- c. Communicating with and advising the Named Plaintiffs;
- d. Drafting and filing the motion to centralize the individual cases in the Northern District of California;
- e. Traveling to and arguing the motion before the JPML in Miami;
- f. After the MDL Consolidation Order, researching and drafting the First Amended Complaint (“FAC”); Second Amended Complaint (“SAC”) and Third Amended Complaint (“TAC”);
- g. Vetting potential experts and working with retained experts on technology, privacy and economic issues when drafting the Complaints and on other issues as the litigation progressed;
- h. Researching and drafting the Plaintiffs’ Oppositions to the Defendant’s Motions to Dismiss the FAC, SAC and TAC;
- i. Preparing for and arguing against the Defendants’ Motions to Dismiss the FAC and the TAC, including travel;
- j. Drafting and arguing motions to compel discovery;
- k. Opposing Defendant’s motion to stay discovery;
- l. Reviewing documents identified by document reviewers for production to Defendant;
- m. Interviewing Lead Plaintiffs to draft and verify Interrogatory responses;
- n. Supervising review of documents produced by Defendant in discovery, including creation of tags and codes and document review memoranda;
- o. Appellate briefing in the Ninth Circuit;
- p. Travel to and argue before the Ninth Circuit;
- q. Review and analysis of Ninth Circuit decision;
- r. Retention of Supreme Court counsel for, and the briefing of, the opposition to the Defendant’s petition to the United States Supreme Court for a writ of certiorari after the Ninth’s Circuit’s ruling that re-instated most of the

1 Plaintiffs' claims;

2 s. Researching and vetting potential mediators;

3 t. Drafting the Plaintiffs' initial and supplemental mediation briefing,
4 including review of "hot documents" in support thereof;

5 u. Working with Plaintiffs' economic expert in developing a damages model
6 and supporting expert reports for use in the mediation;

7 v. Working on the discovery in aid-of-mediation;

8 w. Conducting settlement discussions between the three mediation sessions
9 with defense counsel;

10 x. Leading the three mediation sessions of seven hours on April 27, 2021, ten
11 hours on July 13, 2021, and four hours on July 23, 2021, and consulting with
12 Ms. Bronster (Chair of the Settlement/AG Committee) and other members
13 of the settlement team, including State Court Counsel Renee Wicklund
14 throughout all three mediations and in the intervals between them, a process
15 that ultimately produced settlement agreement in principle through the
16 proposal of the Mediator, Randy Wulff;

17 y. Working closely with co-counsel for some six (6) months after the initial
18 settlement agreement in principle was reached, and further negotiating
19 additional issues with Defendant's counsel, such as the scope of injunctive
20 relief, that remained for resolution after the agreement-in-principle was
21 reached to resolve the case;

22 z. Drafting the settlement agreement and coordinating with State Court
23 Counsel;

24 aa. Analyzing and vetting proposals for the Claims and Notice Administrator
25 role, and, after consultations with Defendants' counsel, selecting Angeion as
26 the most appropriate entity to fill that role for this case;

27 bb. Researching and drafting the initial draft of the Plaintiffs' Memorandum of
28

1 Law In Support of Preliminary Settlement Approval and working closely
2 with co-counsel in finalizing that brief and other papers filed in support of
3 Preliminary Settlement Approval;

4 cc. Drafting, discussing and circulating numerous research memoranda in
5 preparation for the oral argument for Preliminary Settlement Approval,
6 including memoranda: (i) analyzing numerous Ninth Circuit cases
7 addressing the fundamental settlement approval principles and discrete
8 settlement analysis factors outlined in *Churchill Village, Hanlon, Bluetooth*
9 and other cases and the additional analyses required by Rule 23(e) and the
10 Northern District Guidance; the required settlement class certification
11 factors; the somewhat inconsistent cases discussing the weight for settlement
12 approval that Courts assign to the “views of experienced counsel;” and, in
13 analyzing the “risk of continued litigation versus the benefits of the
14 settlement” issue, outlining in detail the required elements of each of the
15 remaining claims and the anticipated defenses to those claims, with the
16 implications for class certification; (ii) analyzing the areas of overlap of
17 Ninth Circuit settlement approval factors with the factors contained in Rule
18 23(e) and the Northern District Guidance; (iii) listing cases discussing the
19 components of an unusually successful settlement; (iv) discussing thematic
20 points supporting preliminary settlement approval; and (v) summarizing all
21 cases cited in Plaintiffs’ Memorandum of Law In Support of Preliminary
22 Settlement Approval, listing and discussing them by category, e.g., class
23 certification requirements, settlement approval factors, and notice
24 requirements;

25 dd. Preparing and circulating a detailed oral argument outline for the
26 Preliminary Settlement Approval hearing;

27 ee. Oral argument in support of Preliminary Settlement Approval;
28

- ff. Working closely with Angeion and Defendant's counsel in handling settlement administration issues, crafting proper notice, ensuring the settlement communications were clear and concise, working to ensure the success of the notice program, and responding to class member inquiries;
- gg. Communications to the Named Plaintiffs and other counsel for Plaintiffs;
- hh. Researching and writing the initial draft of Plaintiffs' Memorandum of Law In Support of Final Settlement Approval, and continuing to work on revisions to that brief and its supporting documents;
- ii. Working with Angeion and Defendant's counsel on a Supplemental Notice Program, negotiating the cost of that program and seeing to its funding and prompt implementation;
- jj. Communicating directly with class members about the settlement; and
- kk. Supervising the preparation of all exhibits to this Declaration.

WORK PERFORMED THROUGH AFFILIATED FIRMS

36. When this litigation commenced, Mr. Grygiel was a partner in the Red Bank, New Jersey law firm of Keefe Bartels. He was the partner in charge of the case at Keefe Bartels, and personally performed the vast majority of Keefe Bartels's substantive work on the case.

37. In April 2014 Mr. Grygiel became a partner at the Baltimore law firm of Silverman Thompson Slutkin White ("STSW"). He was the partner in charge of the case at STSW and personally performed the vast majority of STSW's substantive work on the case.

38. In May 2019 Mr. Grygiel formed Grygiel Law, LLC, personally handled all of Grygiel Law, LLC's work on this case, and funded all of Grygiel Law, LLC's shares of the various expenses of the litigation, including expert costs and mediation expenses.

39. Mr. Straite was a partner with Stewarts Law US LLP in Wilmington, Delaware and New York, NY, where he was the partner in charge of this case.

40. In 2013, Mr. Straite moved his practice to Kaplan Fox & Kilshiemer LLP in New York, NY. At Kaplan Fox, Mr. Straite was the partner in charge of this case and performed a

majority of the work.

41. In 2021, Mr. Straite moved his practice to DiCello Levitt Gutzler LLC, including this case, with the consent of Kaplan Fox. Kaplan Fox partner Laurence D. King continued to serve on the Mediation/Settlement committee until the case resolved.

REVIEW OF TIME AND EXPENSE RECORDS

42. Mr. Grygiel has reviewed the time and expense records of Keefe Bartels, STSW and Grygiel Law, LLC (collectively “T&E Records”). Mr. Grygiel states as follows:

a. Although I keep contemporaneous and detailed time records (with the occasional delay of a day or two), I do not believe the T&E Records reflect all of the hours I have dedicated to this case. My lead role in this very important privacy rights case, the many twists and turns the litigation took, the sometimes conflicting developments of privacy rights law in the jurisprudence of different courts, the various potential damages calculation methods, the complexities and difficulty of the settlement negotiations, all ensured that I was often thinking about this case, and how to succeed in litigating or resolving it, even when I was not directly researching, drafting, arguing or mediating.

b. The chart below summarizes the time entries from the T&E Records of Keefe Bartels, STSW and Grygiel Law, LLC. Because Keefe Bartels’s involvement in the case, which occurred through me, pre-dated the April 3, 2012 Consolidation Order, the Keefe Bartels entry reflects three (3) different compilations: (i) total recorded time; (ii) total recorded time less *all* pre-MDL Consolidation time; and (iii) total recorded time less all pre-MDL Consolidation time *except* for certain pre-MDL Consolidation time reflecting work that I reasonably believe inured to the common benefit of the class and the ultimate success of the case. All of STSW’s and Grygiel Law, LLC’s time occurred after the entry of the Consolidation Order, so no

adjustments for pre-consolidation time are necessary.

Firm	Total Time	Total Time Less <i>All</i> Pre-Consolidation Time	Total Time Less <i>All</i> Pre-Consolidation Time <i>Except</i> for Certain Common Benefit Pre-Consolidation Time
Keefe Bartels	\$574,332.50	\$440,020.00	\$524,610 (includes 76.9 hours of S. Grygiel pre-Consolidation work)
STSW	\$471,384.50	N/A	N/A
Grygiel Law, LLC	\$664,510	N/A	N/A

c. I analyzed the T&E Records in seeking to ensure that inefficiencies and duplications were identified and removed. Given the age of the case, and the sometimes terse descriptions of some work, I cannot state that all inefficiencies and duplications were removed. However, because the T&E Records primarily reflect my own work, I can state that any unremoved inefficiencies and duplications are, in the context of the overall T&E Reports in this case, immaterial.

d. My pre-consolidation time at Keefe Bartels involved substantial legal research into many of the claims that ultimately were reinstated by the Ninth Circuit, working with co-counsel on the drafting of an initial Complaint, working with experts, gaining insight and knowledge about the technology at issue, analyzing potential statutory and common law damages calculations, and working with other counsel to develop an appropriate, efficient and effective leadership structure for the efficient prosecution of the case. All of that work remained not just useful, but important, in my post-

Consolidation work on the case. My pre-Consolidation work was the crucial foundation on which the rest of my work in the case built and that ultimately produced what is undeniably a superb final settlement result. Put still another way, my pre-consolidation work “conferred benefits on the multidistrict class.” *In re Volkswagen and Audi Warranty Extension Litig.*, 89 F.Supp. 3d 155, 180-181 (D. Mass. 2015) (analyzing pre-consolidation time and construing “record generously” in favor of compensating for such time where, among other factors, “there is little evidence that...pre-consolidation fees” were incurred for “opportunistic or copycat work which is undeserving of compensation”).

e. I have used a billing rate of \$1,100/hr. for all of my work in this case. Given my qualifications and experience, and upon review of recent Ninth Circuit law concerning billing rates (addressing rates approved for lawyers at various levels of experience; the relevant jurisdiction for determining prevailing rates; the use of current versus historical rates, and other issues), I believe that \$1,100/hr. is a fair and reasonable rate for my work in this class action case, undertaken entirely on a contingency basis with a high degree of risk.

f. For the other lawyers whose work is reflected in my affiliated firms’ T&E Records, I have used the billing rate in effect for them when they performed the tasks reflected.

g. The following chart summarizes the expenses incurred by Keefe Bartels, STSW and Grygiel Law, LLC. Grygiel Law, LLC’s expenses include no charges for computerized legal research, paper and copying, and other such

charges for which many firms do properly and customarily charge.

FIRM	TOTAL EXPENSES
Keefe Bartels	\$20,164.50 (includes \$13,366.05 in pre-consolidation expenses)
STSW	\$45,261.19
Grygiel Law, LLC	\$15,600.54

43. Mr. Straite has reviewed the time and expense records of Stewarts Law, Straite PLLC, Kaplan Fox and DiCello Levitt (collectively the “T&E Records”). Mr. Straite states as follows:

- a. I keep contemporaneous and detailed time records and the hours reflected in my affiliated firms’ T&E records appear accurate. I also personally supervised timekeepers at my affiliated firms, and reviewed the time reports at each firm repeatedly over the years to ensure accuracy.
- b. The chart below summarizes the time from my affiliated firms. Because Stewarts Law’s involvement in the case, which occurred through me, predated the April 3, 2012 Consolidation Order, the entry reflects: (i) total recorded time; and (ii) total recorded time less *all* pre-MDL Consolidation time. All of other time at my affiliated firms occurred after the entry of the Consolidation Order, so identification of pre-consolidation time is necessary.

Firm	Total Time	Total Time Less <i>All</i> Pre-Consolidation Time
Stewarts Law	\$1,046,386.50	\$586,336.00
Straite PLLC	\$6,380.00	N/A
Kaplan Fox	\$1,896,501.50	N/A
DiCello Levitt	\$826,860.50	N/A

1 c. I analyzed the T&E Records in seeking to remove duplication. Given that I
2 personally supervised all tasks and most of the work was done personally by
3 me, I can state with a high degree of confidence that the reported hours are
4 accurate.

5 d. My pre-consolidation time at Stewarts Law involved substantial legal
6 research into many of the claims that ultimately were included in the
7 Complaint, working with experts, gaining insight and knowledge about the
8 technology at issue, analyzing potential statutory and common law damages
9 calculations, and working with other counsel to develop an appropriate,
10 efficient and effective leadership structure for the efficient prosecution of the
11 case. I also personally argued at the pre-consolidation CMCs, and drafted
12 the motion to centralize filed with the JPML, and personally argued before
13 the Panel. All of that work remained not just useful, but important, in my
14 post-Consolidation work on the case. My pre-Consolidation work was the
15 foundation on which the rest of my work in the case built. Put still another
16 way, my pre-consolidation work conferred benefits on the multidistrict class.
17 I believe it appropriate that the pre-consolidation time be included in
18 lodestar.

19 e. I have used a billing rate of \$1,100/hr. for all of my work in this case. Given
20 my qualifications and 26 years of experience, and upon review of recent
21 Ninth Circuit law concerning billing rates (addressing rates approved for
22 lawyers at various levels of experience; the relevant jurisdiction for
23 determining prevailing rates; the use of current versus historical rates, and
24 other issues), I believe that \$1,100/hr. is a fair and reasonable rate for my
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work in this class action case, undertaken entirely on a contingency basis with a high degree of risk.

f. Magistrate Judge Susan van Keulen earlier this year awarded fees to my firm based on my hourly rate of \$1,100.00, and \$600 for associate Adam Prom, and \$350 for paralegals. *See Calhoun v. Google LLC*, 4:20-cv-5146-YGR-SVK (N.D. Cal.).

g. For the other lawyers whose work is reflected in my affiliated firms' T&E Records, I have used the billing rate in effect for them when they performed the tasks reflected if that timekeeper withdrew from working on the case, or current rates if they continued working on the case. I believe the hourly rates requested therein are appropriate.

h. I have been coordinating with State Court Counsel to ensure that MDL Counsel are apprised of T&E claimed in that Action. The State Court Counsel lodestar is excluded from total lodestar reported to the Court to avoid the appearance of duplication. Counsel at Milberg reported lodestar of \$671,137.50 to me, and expenses of \$37,533.95. Counsel at Richman Law Group reported his firm's lodestar in Exhibit 14 hereto, but again, only for transparency and not for inclusion in total lodestar reported to the Court.

i. The following chart summarizes the unreimbursed expenses incurred by my affiliated firms:

FIRM	TOTAL EXPENSES
Stewarts Law	\$13,745.94
Straite PLLC	\$10,582.18
Kaplan Fox	\$105,913.52

DiCello Levitt

\$12,087.69

**ADDITIONAL FACTS REGARDING CLAIMS ADMINISTRATION AND IN FURTHER
SUPPORT OF FINAL APPROVAL**

44. During the claims administration process, class members were instructed to contact Angeion with questions about the case or the claims process. Nevertheless, some contacted counsel, and communications are recorded in a central system at DiCello Levitt. As of the date of this declaration, Lead Counsel and our firms have responded to 48 inquiries and to our knowledge all 48 were resolved successfully. After the conclusion of the claims process, Lead Counsel will file a full report of these communications and any later communications.

45. Also during the claims administration process, Lead Counsel and Defense counsel checked in with Angeion for periodic updates. On August 12, 2022, during a Zoom call with Defense counsel, Lead Counsel and representatives of Angeion, we asked Angeion to provide a quote to initiate a supplemental direct and media notice program, re-noticing the class and reminding class members of the September deadlines. Defendant and Lead Counsel approved, and Defendant agreed to pre-fund the costs. The purpose of the supplemental program was to further increase the claims rate. This supplemental program is detailed in the Weisbrot Declaration, Ex. 1 hereto.

We declare under penalty of perjury that the foregoing is true and correct.

Dated: August 23, 2022

/s/ David Straite

David A. Straite (admitted *pro hac vice*)
At New York, New York

/s/ Stephen Grygiel

Stephen G. Grygiel (admitted *pro hac vice*)
At Clinton, New York

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

I, David A. Straite, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of August, 2022, at New York, NY

/s/ David Straite

David A. Straite

Exhibit 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**DECLARATION OF STEVEN
WEISBROT OF ANGEION GROUP, LLC
RE: IMPLEMENTATION OF NOTICE
PLAN**

I, Steven Weisbrot, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am the President and Chief Executive Officer at the class action notice and claims administration firm Angeion Group, LLC (“Angeion”). I am fully familiar with the facts contained herein based upon my personal knowledge.
2. My credentials were provided to this Court in my prior declaration (Dkt. No. 233-1) (“Notice Plan Declaration”).
3. The purpose of this declaration is to provide the Parties and the Court with a summary of the work performed by Angeion to effectuate notice pursuant to the Court’s March 31, 2022, Order Certifying Settlement Class; Granting Preliminary Approval of Class Action Settlement Pursuant to Federal Rule of Civil Procedure 23(e)(1); and Approving Form and Content of Class Notice (Dkt. No. 241).

4. Angeion was appointed as Settlement Administrator to, among other tasks, supervise and administer the notice procedures, establish and operate the Settlement Website, administer the claims processes, distribute cash payments according to the processes and criteria set forth in the Settlement Agreement, and perform any other duties that are reasonably necessary and/or provided for in the Settlement Agreement.

5. As described in my Notice Plan Declaration, the Notice Plan was comprised of direct notice via email to all reasonably identifiable Settlement Class Members, combined with a robust media campaign consisting of state-of-the-art targeted internet notice, social media notice, and a paid search campaign. The Notice Plan also provided for the implementation of a dedicated Settlement Website and a toll-free telephone line where Settlement Class Members can learn more about their rights and options pursuant to the terms of the Settlement and a customized claim stimulation package (the “Claim Stimulation Package”) to further diffuse news of the Settlement.

DIRECT NOTICE

6. On or about May 2, 2022, Angeion received data file(s) consisting of the names and email addresses of Settlement Class Members. Angeion reviewed the data and removed duplicative records.

7. Angeion then performed an email cleansing process to help ensure the accuracy of recipient email addresses. This email cleansing process removed extra spaces, fixed common typographical errors in domain names, and corrected insufficient domain suffixes (e.g., gmail.com to gmail.com, gmail.co to gmail.com, yaho.com to yahoo.com, etc.). After the cleansing process, those email addresses were further subjected to an email validation process whereby each email address was compared to known bad email addresses. Additionally, the email addresses were further verified by contacting the ISP to determine if the email addresses exist.

8. These efforts resulted in 114,078,891 unique and valid Settlement Class Member email addresses.

9. Beginning on June 30, 2022, through and including July 12, 2022, Angeion caused email notice to be sent to the 114,078,891 Settlement Class Members. In total, 86,075,107 email

notices were successfully delivered and 28,003,784 email notices could not be delivered. A true and correct copy of the email notice is attached hereto as **Exhibit A**.

MEDIA NOTICE

10. As described in my Notice Plan Declaration, the media campaign consisting of state-of-the-art targeted internet notice, social media notice, and a paid search campaign was designed to deliver an approximate 70.24% reach with an average frequency of 2.12 times each. It should be noted that the 70.24% reach approximation does not include the direct notice efforts, impressions garnered through the Claim Stimulation Package, the dedicated Settlement Website or the toll-free hotline, because the impacts of these components are not currently able to be estimated and thus cannot be included in the reach percentage.

11. On July 14, 2022, Angeion commenced the media campaign notice. The media campaign ran for four (4) consecutive weeks and delivered a total of 377,909,804 impressions. The number of impressions delivered exceeded the original number of impressions the Notice Plan targeted, resulting in an increased overall media campaign reach percentage of 70.30% with an average frequency of 2.13 times. True and accurate copies of the digital banner advertisements and social media ads are attached hereto as **Exhibit B**.

CLAIMS STIMULATION PACKAGE

12. In addition to the above-described notice efforts, on July 14, 2022, Angeion implemented a customized and strategic Claims Stimulation Package consisting of sponsored listings on two leading class action settlement websites, www.topclassactions.com and www.classaction.org, and active listening on Twitter wherein we monitor Twitter traffic for discussion of the Settlement, and actively provide notice and/or answers to frequently asked question via Twitter as appropriate.

13. The Claims Stimulation noticing used simplified messaging specifically designed to drive Settlement Class Members to the Settlement Website and ultimately submit a claim. True and accurate copies of the sponsored listings are attached hereto as **Exhibit C**.

ADDITIONAL NOTICE EFFORTS

14. Angeion, in consultation with the Parties, is implementing the following additional notice efforts: (1) Sending reminder email notices to Settlement Class Members whose initial email notice was able to be delivered; (2) Commencing an additional programmatic banner advertisements campaign; and (3) Extending the paid search campaign to assist Settlement Class Members who are searching for information about the Settlement. Similar to the Claims Stimulation efforts above, these additional notification efforts are not included in the reach and frequency approximation provided in this declaration but nonetheless represent a substantial additional notice effort, which is likely to meaningfully affect the number of claims received in this matter.

SETTLEMENT WEBSITE & TOLL-FREE TELEPHONE LINE SUPPORT

15. On June 15, 2022, Angeion established the following website devoted to this Settlement: www.fbinternettrackingsettlement.com (the “Settlement Website”). The Settlement Website contains general information about the Settlement, including answers to frequently asked questions, important dates and deadlines pertinent to the Settlement, and copies of important documents. Visitors to the Settlement Website can download the (1) Long-Form Notice, (2) Claim Form, (3) Opt-Out Form, (4) Preliminary Approval Order, (5) Class Action Settlement Agreement and Release, (6) Notice of Motion and Motion for Certification of Settlement Class and Preliminary Approval, (7) Joint Declaration of David A. Straite and Stephen G. Grygiel in Support of Notice of Motion, and (8) copies of the applicable Complaints in this litigation.

16. The Settlement Website also has a “Contact Us” page whereby Settlement Class Members can submit questions regarding the Settlement to a dedicated email address: info@fbinternettrackingsettlement.com.

17. Settlement Class Members are also able to submit a Claim Form or a request to be excluded from the Settlement via the Settlement Website.

18. Through August 21, 2022, the Settlement Website has had 766,072 visitors and 1,468,848 page-views.

19. On June 15, 2022, Angeion established the following toll-free hotline dedicated to this Settlement: 1-844-665-0905. The toll-free hotline utilizes an interactive voice response (“IVR”) system to provide Settlement Class Members with responses to frequently asked questions and provide essential information regarding the Settlement. The hotline is accessible 24 hours a day, 7 days a week. Additionally, Settlement Class Members are able to request a copy of the Long-Form Notice or Claim Form via the toll-free hotline.

20. Through August 21, 2022, the toll-free hotline has received 4,997 calls totaling 19,048 minutes.

CLAIM FORM SUBMISSIONS, EXCLUSIONS AND OBJECTIONS

21. The deadline for Settlement Class Members to submit a Claim Form is September 22, 2022. Through August 21, 2022, Angeion has received a total of 1,352,214 Claim Form submissions. These submissions are still subject to final auditing, including the full assessment of each claim’s validity and a review for duplicative and/or fraudulent submissions.

22. The deadline for Settlement Class Members to request exclusion from the Settlement is September 12, 2022. Through August 21, 2022, Angeion has received a total of 1,856 exclusion requests. A list of the names of the people requesting exclusion from the Settlement is attached hereto as **Exhibit D**.

23. The deadline for Settlement Class Members to object to the Settlement is September 12, 2022. Through August 21, 2022, Angeion has received and/or been made aware of three (3) objections to the Settlement (Dkt. No. 248, Dkt. No. 249 and Dkt. No. 251).

24. Angeion will continue to keep the Parties apprised of the number of Claim Form submissions, requests for exclusions and objections it receives.

CONCLUSION

25. As detailed above, the media campaign of the Notice Plan exceeded expectations by delivering an approximate 70.30% reach with an average frequency of 2.13 times each. Combined with the direct notice efforts, the approximate reach percentage achieved through this Notice Plan is 80.41% reach with an average frequency of 2.28 times each.

26. It should be noted that the combined reach approximation provided in this declaration does not include the Claim Stimulation Package, the dedicated Settlement Website, the toll-free hotline or additional notice efforts, because the impacts of these components are not currently able to be estimated and thus cannot be included in the reach percentage.

27. It remains my professional opinion that the Notice Plan implemented in this Settlement provided full and proper notice to Settlement Class Members and was the best notice practicable under the circumstances, fully comporting with due process and Fed. R. Civ. P. 23.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: August 23, 2022

STEVEN WEISBROT

Exhibit A

United States District Court for the Northern District of California

In Re Facebook Internet Tracking Litigation, Case No. 5:12-MD-02314-EJD

NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION

If you are a person who, between April 22, 2010 and September 26, 2011, inclusive, were a Facebook User in the United States who visited non-Facebook websites that displayed the Facebook Like button, you may be eligible for a payment from a Class Action Settlement.

A federal court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

- A Settlement¹ has been reached between Defendant Meta Platforms, Inc., formerly Facebook, Inc. (“Meta” or “Defendant”) and Plaintiffs in a class action lawsuit pending in the United States District Court for the Northern District of California.
- You are included in this Settlement as a Settlement Class Member if, between April 22, 2010 and September 26, 2011 inclusive, you were a Facebook User in the United States who visited non-Facebook websites that displayed the Facebook Like button.
- The lawsuit is known as *In Re Facebook Internet Tracking Litigation*, Case No. 5:12-MD-02314-EJD (N.D. California). Defendant denies that it violated any law but has agreed to the Settlement to avoid the costs and risks associated with continuing this case.
- Your rights are affected whether you act or don’t act. Please read this Notice carefully.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM	The only way to receive a payment from this Settlement is by submitting a timely and properly completed Claim Form that obtains approval from the Settlement Administrator. The Claim Form must be submitted no later than September 22, 2022. You can submit your Claim Form online at www.FBInternetTrackingSettlement.com or download the claim from the Settlement Website and mail it to the Settlement Administrator. If your claim is approved by the Settlement Administrator, you will give up the right to sue the Defendant in a separate lawsuit about the legal claims this Settlement resolves.	September 22, 2022

¹ All capitalized terms not defined herein have the same meaning as in the Settlement Agreement, which can be viewed at www.FBInternetTrackingSettlement.com.

OPT OUT OF THE SETTLEMENT	You can choose to opt out of the Settlement and receive no payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement.	September 12, 2022
OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING	If you do not exclude yourself from the Settlement, you may object to it by writing to the Court about why you don't like the Settlement. If you object, you may also file a claim for a payment. You may object to the Settlement and ask the Court for permission to speak at the Final Approval Hearing about your objection.	September 12, 2022
DO NOTHING	Unless you exclude yourself, you are automatically part of the Settlement. If you do nothing, you will not get a payment from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement.	No Deadline

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement.

WHAT THIS NOTICE CONTAINS

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THE SETTLEMENT BENEFITS	4
HOW TO GET A PAYMENT—MAKING A CLAIM	5
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BASIC INFORMATION

1. Why was this Notice issued?

A federal court authorized this Notice because you have a right to know about the proposed Settlement of this class action lawsuit and about all of your options before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The Honorable Edward J. Davila of the United States District Court for the Northern District of California is overseeing this class action. The case is known as *In Re Facebook Internet Tracking Litigation*, Case No. 5:12-MD-02314-EJD (N.D. Cal.). The people that filed this lawsuit are called the “Plaintiffs” and the company they sued, Meta Platforms, Inc. (formerly Facebook, Inc.), is called the “Defendant.”

2. What is this lawsuit about?

This lawsuit alleges that the Defendant improperly obtained and collected data from Facebook Users in the United States who visited non-Facebook websites that displayed the Facebook Like button between April 22, 2010 and September 26, 2011, inclusive. The Defendant expressly denies any liability or wrongdoing whatsoever.

3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. Together, the people included in the class action are called a class or class members. One court resolves the lawsuit for all class members, except for those who exclude themselves from a settlement. In this Settlement, the Settlement Class Representatives are Perrin Davis, Cynthia Quinn, Brian Lentz, Matthew Vickery, Ryan Ung, Chi Cheng, and Alice Rosen.

4. Why is there a Settlement?

The Court did not decide in favor of Plaintiffs or Defendant. Defendant further denies all claims and that it violated any law. Plaintiffs and Defendant agreed to a Settlement to avoid the costs and risks of a trial, and the Settlement Class Members can receive payments from the Settlement. The Settlement Class Representatives and their attorneys think the Settlement is best for all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. Who is in the Settlement?

The Settlement Class includes all persons who, between April 22, 2010 and September 26, 2011, inclusive (the “Settlement Class Period”), were Facebook Users in the United States that visited non-Facebook websites that displayed the Facebook Like button.

6. Are there exceptions to being included?

Yes. The Settlement Class does not include: (a) Meta and any and all of its predecessors, successors, assigns, parents, subsidiaries, affiliates, directors, officers, employees, agents, representatives, and attorneys, and any and all of the parents’, subsidiaries’, and affiliates’ present and former predecessors, successors, assigns, directors, officers, employees, agents, representatives, and attorneys; (b) any

judicial officer presiding over the Actions, or any member of his or her immediate family or of his or her judicial staff; (c) any Excluded Settlement Class Member; (d) the Settlement Administrator and any and all of its predecessors, successors, assigns, parents, subsidiaries, affiliates, directors, officers, employees, agents, representatives, and attorneys, and any and all of the parents', subsidiaries', and affiliates' present and former predecessors, successors, assigns, directors, officers, employees, agents, representatives, and attorneys; and (e) Lead Class Counsel and any and all of their predecessors, successors, assigns, parents, subsidiaries, affiliates, directors, officers, employees, agents, representatives, and attorneys.

If you are not sure whether you are included in the Settlement Class, you can ask for free help by emailing the Settlement Administrator at **info@FBInternetTrackingSettlement.com** or calling the Settlement Administrator at **1-844-665-0905**. You may also view the Settlement Agreement at **www.FBInternetTrackingSettlement.com**.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

If the Settlement is approved by the Court, Defendant will establish a Settlement Fund of ninety million dollars (\$90,000,000.00) to pay all valid claims submitted by the Settlement Class Members, as well as notice and administration expenses, attorneys' fees and expenses, and service awards for the Settlement Class Representatives.

As non-financial consideration for the Settlement, if approved by the Court, Defendant will delete to the extent not already deleted from all of Defendant's potentially relevant systems all cookie data (i) that Facebook received or collected from, about, or associated with Facebook Users in the United States who visited non-Facebook websites that displayed the Facebook Like button between April 22, 2010 and September 26, 2011, and (ii) that may be used to identify a specific Facebook User from Facebook cookies.

8. How much will my payment be?

The total amount distributed to the Settlement Class Members shall be the Settlement Fund and any interest earned thereon, less the Administrative Costs, any amount awarded by the Court for any Fee and Expense Award to Settlement Class Counsel, and any Service Awards. This amount to be distributed to the Settlement Class Members is the Net Settlement Fund.

If you submit an Approved Claim and have not submitted a valid and timely request for exclusion from the Settlement Class, you will receive an *equal* share of the Net Settlement Fund. All payments to Settlement Class Members who have not sought to exclude themselves and who have submitted valid and timely claims will be in equal amounts. No such Settlement Class Member will receive a greater, or lesser, payment than any other Settlement Class Member.

9. What claims am I releasing if I stay in the Settlement Class?

Unless you exclude yourself from the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendant about any of the legal claims this Settlement resolves. The “Released Claims” section in the Settlement Agreement describes the legal claims that you give up (“release”) if you remain in the Settlement Class. The Settlement Agreement can be found at www.FBInternetTrackingSettlement.com.

HOW TO GET A PAYMENT—MAKING A CLAIM

10. How do I submit a claim and get a cash payment?

Claim Forms may be submitted online at www.FBInternetTrackingSettlement.com or printed from the website and mailed to the Settlement Administrator at: *Facebook Internet Tracking Litigation*, c/o Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

You may also contact the Settlement Administrator to request a Claim Form by telephone 1-844-665-0905, by email info@FBInternetTrackingSettlement.com, or by U.S. mail at *Facebook Internet Tracking Litigation*, c/o Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

11. What is the deadline for submitting a claim?

If you submit a claim by U.S. mail, the completed and signed Claim Form must be postmarked by **September 22, 2022**. If submitting a Claim Form online, you must do so by **11:59 p.m. PST on September 22, 2022**.

12. When will I get my payment?

The Court has scheduled a Final Fairness Hearing for the Settlement of this case on October 27, 2022 at 9:00 a.m. PST to consider: (1) whether to approve the Settlement; (2) any objections; (3) the requests for awards to the Settlement Class Representatives; and (4) the request for an award of attorneys’ fees, costs and expenses to Settlement Class Counsel for their work in this litigation. If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Settlement payments will be distributed as soon as possible, if and when the Court grants Final Approval of the Settlement and after any appeals are resolved.

The briefs and declarations in support of the Final Approval of the Settlement and the requests described above will be posted on the Settlement Website, www.FBInternetTrackingSettlement.com, after they are filed. You may ask to appear at the hearing but you do not have to appear. The date and

time of the Final Approval Hearing is also subject to modification by the Court. Please review the Settlement Website for any updated information regarding the final hearing.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in the case?

Yes. The Court has appointed the law firms of DiCello Levitt Gutzler LLC, Grygiel Law LLC, and Simmons Hanly Conroy LLC to represent the Settlement Class as Lead Class Counsel. You will not be charged for their services.

14. Should I get my own lawyer?

You do not need to hire your own lawyer because Lead Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

15. How will the lawyers be paid?

Lead Class Counsel will ask the Court for an award of attorneys' fees not to exceed 29% of the Settlement Fund, and expenses not to exceed \$600,000. They will also ask the Court to approve a service award for each of the Settlement Class Representatives not to exceed \$5,000 each. The Court may award less than these amounts. If approved, these fees, costs and awards will be paid from the Settlement Fund.

EXCLUDING YOURSELF FROM THE SETTLEMENT

16. How do I opt out of the Settlement?

If you do not want to receive any benefits from the Settlement, and you want to keep your right, if any, to separately sue the Defendant about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called "opting out" of the Settlement Class. The deadline for requesting exclusion from the Settlement is **September 12, 2022**.

To exclude yourself from the Settlement, you must submit a completed and signed Opt-Out Form online at www.FBInternetTrackingSettlement.com or by U.S. mail at the below address. Alternatively, you can submit a written request for exclusion that includes: (1) your name; (2) your current address; (3) a clear and explicit statement that you wish to be excluded from the Settlement - *In Re Facebook Internet Tracking Litigation*, Case No. 5:12-MD-02314-EJD (N.D. Cal.); and (4) your signature. Your request for exclusion must be submitted online at **www.FBInternetTrackingSettlement.com** or via U.S. mail at the address below:

Facebook Internet Tracking Litigation

ATTN: Exclusion Request

PO Box 58220

Philadelphia, PA 19102

If you exclude yourself, you are stating to the Court that you do not want to be part of the Settlement. You will not be eligible to receive a payment if you exclude yourself.

If submitted electronically, the Opt-Out Form or any written request to opt-out must be submitted no later than 11:59 p.m. PST on or before **September 12, 2022**.

If submitted by U.S. mail, the Opt-Out Form or any written request to opt-out must be postmarked no later than **September 12, 2022**.

COMMENTING ON OR OBJECTING TO THE SETTLEMENT

17. How do I tell the Court if I do not like the Settlement?

If you are a Settlement Class Member, you can object to the Settlement if you do not like it or a portion of it. You can give reasons why you think the Court should not approve it. The Court will consider your views.

Your Objection must include: (i) the case name and number: *In Re Facebook Internet Tracking Litigation*, Case No. 5:12-MD-02314-EJD (N.D. Cal.); (ii) the Objector's full name, address, telephone number, email address; Facebook account URL (if reasonably available); the email address and telephone number associated with the Settlement Class Member's Facebook account, and his or her signature; (iii) the full name, address, telephone number, and email address of the Objector's counsel (if the Objector is represented by counsel); and (iv) the grounds for the Objection, including any legal and factual support and any evidence in support of the Objection.

Any comments or Objections from Settlement Class Members regarding the proposed Settlement Agreement must be submitted in writing to the Court either by mailing them to the Class Action Clerk, United States District Court for the Northern District of California; or by filing them in person at any location of the United States District Court for the Northern District of California, and they must be filed or postmarked on or before **September 12, 2022**.

**Class Action Clerk
United States District Court for the Northern District of California
280 South 1st Street
San Jose, California 95113**

You or your attorney may speak at the Final Approval Hearing about your objection. To do so, you must include a statement in your objection indicating that you or your attorney intend to appear at the Final Approval Hearing.

18. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and stating to the Court that you do not want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because it no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

19. When is the Court's Final Approval Hearing?

The Court has scheduled a Final Approval Hearing at **9:00 a.m.** PST on **October 27, 2022**. If the hearing proceeds **in person**, it will be held at the San Jose Courthouse, Courtroom 4—5th Floor, 280 South 1st Street, San Jose, CA 95113. If the Court holds the hearing **by video conference**, it may be accessed here:

<https://cand-uscourts.zoomgov.com/j/1604896302?pwd=b0ZTckVxODFCMm1rcjRvSGFMMjVRUT09>

Webinar ID: 160 489 6302

Password: 544953

At the Final Approval Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider whether to approve Lead Class Counsel's request for an award of attorneys' fees and expenses, as well as the Settlement Class Representatives' service awards. If there are objections, the Court will consider them. Judge Davila will listen to people who have asked to speak at the hearing (see Question 17 above). After the hearing, the Court will decide whether to approve the Settlement.

The date or time of the Final Approval Hearing may change. Please check the Settlement Website, **www.FBInternetTrackingSettlement.com**, for any updates, and to find out whether the Final Approval Hearing will be held in person or by video conference.

20. Do I have to come to the Final Approval Hearing?

No. Lead Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you submit an objection, you do not have to come to the Final Approval Hearing to talk about it. If you submit your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but such attendance is not necessary for the Court to consider an objection that was filed on time.

IF I DO NOTHING

21. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will give up the rights explained in Question 9, including your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties about the legal issues resolved by this Settlement. In addition, you will not receive a payment from this Settlement.

GETTING MORE INFORMATION

22. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at the Settlement Website, www.FBInternetTrackingSettlement.com.

If you have additional questions, you may contact the Settlement Administrator by email, phone, or mail:

Email: info@FBInternetTrackingSettlement.com

Toll-Free: 1-844-665-0905

Mail: *Facebook Internet Tracking Litigation*, c/o Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103

Publicly filed documents can also be obtained by visiting the office of the Clerk of the United States District Court for the Northern District of California or reviewing the Court's online docket.

Exhibit B

If, between **April 2010 and September 2011**, you were a **Facebook User in the U.S.** who visited non-Facebook websites that displayed the **Facebook Like button**, you may be eligible for a payment from a Class Action Settlement.

CLICK HERE
for more
information



Angeion Group @AngeionGroup · Jul 14

If, between April 2010 and September 2011, you were a Facebook User in the U.S. who visited non-Facebook websites that displayed the Facebook Like button, you may be eligible for a payment from a Class Action Settlement.



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In Re Facebook Internet Tracking
Litigation



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In Re Facebook Internet Tracking Litigation

If, between April 2010 and September 2011, you were a Facebook User In the U.S. who visited non-Facebook websites that displayed the Facebook Like button, you may be eligible for a payment from a Class Action Settlement.

[CLICK HERE for more information](#)



fbinternetttrackingsettlement....

[LEARN MORE](#)

 Comment  Give Award  Share  Save

Exhibit C

Facebook internet tracking litigation \$90 million class action settlement

By Top Class Actions
July 14, 2022

EDITOR'S NOTE: This content has been sponsored and edited for clarity in collaboration with the sponsor.

Facebook, now known as Meta Platforms, agreed to pay \$90 million to resolve claims alleging unlawful user tracking on non-Facebook websites.

The settlement benefits people who were Facebook users between April 22, 2010 and September 26, 2011, inclusive, and visited non-Facebook websites that displayed the Facebook “Like” button.

Facebook is a social media platform used by billions of people around the world. This class action lawsuit against Facebook alleges that it tracked user activity through “Like” buttons on non-Facebook websites. This button allegedly allowed Facebook to use cookies to identify a user on an external website that used the Facebook “Like” plugin. Plaintiffs contend that even if the user didn’t interact with this plugin, Facebook was able to track his or her activity across the web.

Plaintiffs’ complaint in this lawsuit alleges that “[w]hen Facebook’s session and tracking cookies link the URLs to specific persons, anonymity disappears.” The complaint also asserts that “Facebook can link the web browsing of more than one billion people to their actual identities.”

The consolidated class action argues that users had their privacy rights violated by such conduct, and the complaint includes claims under the Federal Wiretap Act.

Facebook does not admit to wrongdoing and denies that it violated any law but has [agreed to pay \\$90 million](#) to settle the litigation to avoid the costs and risks associated with continuing the case.

Under the terms of this [settlement](#), the \$90 million settlement fund will be distributed to settlement class members who submit approved claims. Each authorized claimant will be entitled to receive an equal share of the settlement fund.

Exact payment amounts will vary depending on the number of authorized settlement class members. The larger the number of authorized settlement class members, the smaller the settlement payments will be, and vice versa.

The settlement also requires Facebook to sequester and delete all cookie data as pled in the complaint that was received or associated with settlement class members between April 22, 2010 and September 26, 2011, inclusive, that may be used to identify a specific user.

The deadline for exclusion and objection is Sept. 12, 2022.

In order to receive a settlement payment, settlement class members must submit a valid claim form by Sept. 22, 2022.

The final approval hearing for this settlement is scheduled for Oct. 27, 2022.

Who's Eligible

Persons who, between April 22, 2010 and Sept. 26, 2011, inclusive, were Facebook users in the United States who visited non-Facebook websites that displayed the Facebook Like button.

Potential Award

Will depend on the number of authorized claimants.

Proof of Purchase

No proof of purchase is necessary, but settlement class members should enter all usernames or URLs for Facebook accounts they used between April 22, 2010 and Sept. 26, 2011, if possible. Entering their usernames will increase the chances of the settlement administrator finding their accounts; if the class members cannot remember their usernames, the administrator will try to find their accounts based on the other information provided on the claim forms.

Claim Form

[CLICK HERE TO FILE A CLAIM »](#)

NOTE: If you do not qualify for this settlement do NOT file a claim.

Remember: you are submitting your claim under penalty of perjury. You are also harming other eligible Settlement Class Members by submitting a fraudulent claim. If you're unsure if you qualify, please read the FAQ section of the Settlement Administrator's website to ensure you meet all standards (Top Class Actions is not a Settlement Administrator). If you don't qualify for this settlement, check out our database of other open class action settlements you may be eligible for.

Claim Form Deadline

09/22/2022

Case Name

In re: Facebook Internet Tracking Litigation, Case No. 5:12-MD-02314-EJD in the U.S. District Court for the Northern District of California

Final Hearing

10/27/2022

Settlement Website

FBInternetTrackingSettlement.com

Claims Administrator

Facebook Internet Tracking Litigation
c/o Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103
info@FBInternetTrackingSettlement.com
844-665-0905

Class Counsel

DICELLO LEVITT GUTZLER LLC

GRYGIEL LAW LLC

SIMMONS HANLY CONROY LLC

Defense Counsel

COOLEY LLP

ClassAction.org

Claim Deadline: Sep. 22, 2022

Facebook Internet Tracking Class Action Settlement



If you had a Facebook account between April 22, 2010 and September 26, 2011, you may be covered by a recent **\$90 million class action settlement**.

Click the link below to go right to the settlement website or keep reading for more information.

The link below will take you to the official website for the Facebook tracking class action settlement.

[TAKE ME TO THE OFFICIAL SETTLEMENT SITE](#)

FAQs

What's Going On?

Facebook has agreed to settle a class action lawsuit that alleged the social media giant improperly obtained and collected data from users who visited non-Facebook websites displaying the Facebook "Like" button.

Who Can File a Claim with the Settlement?

If you were a Facebook user between April 22, 2010 and September 26, 2011 and you visited external websites displaying the Facebook "Like" button, you may be able to file a claim with the settlement.

How Much Could I Get?

Each person who submits a valid claim will receive an equal share of the \$90 million settlement fund, less expenses.

Ultimately, the amount distributed to claimants will depend on a number of factors, including how many people submit claims and what it costs to administer the settlement.

How Do I File a Claim?

You will have to visit the settlement website and click "submit a claim."

You can find the claim page [right here](#).

Is the Website Legit?

Yes. It has been designated by the court as the official website for the settlement and where Facebook users will need to go if they want to submit a claim.

Is There a Deadline for This?

Yes. The deadline for filing a claim with the settlement is September 22, 2022.

The link below will take you to the official website for the Facebook tracking class action settlement.

[TAKE ME TO THE OFFICIAL SETTLEMENT SITE](#)

ClassAction.org

[Terms of Use](#) [Disclaimer](#) [Privacy Notice](#)

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Exhibit D

No.	First Name	Last Name
1	RAYMOND	AARON
2	RUSLAN	ABDIKEEV
3	CRYSTAL	ABERCROMBIE
4	BARBARA	ABERCROMBIE
5	CHRISTOPHER	ABRAMS
6	RAQUEL	ACEVEDO
7	YURIETH	ACOSTA
8	STEWART	ADAM
9	JAQUAN	ADAMS
10	QUANYELLE	ADAMS
11	ANGELIQUE	ADAMS
12	SHERESE	ADAMS
13	LYDIA	ADAMS
14	TERRENCE	ADAMS
15	STEVEN	ADAMSON
16	LORI	ADKINS
17	AMY	ADKINS
18	BRAD	ADKINS
19	EDELMA	AGUILERA
20	TAKISHA	AKINLABI
21	JEAN	AKINS
22	JANICE	AKINS-FOURNIER
23	SHANNON	ALDERMAN
24	ADELLA	ALEMAN
25	NATALI	ALEMAN
26	TOLEDA	ALEXANDER
27	YVETTE	ALEXANDER
28	JENNY	ALEXANDER
29	NORMA	ALFARO
30	KOLE	ALFORD
31	NADIA	ALLEN
32	SYMONE	ALLEN
33	SADE	ALLEN
34	KENYETTA	ALLEN
35	RYAN	ALLEN
36	LATONYA	ALLEN
37	SEMAJ	ALLISON
38	PAT	ALLISON
39	JAMES	ALLISON
40	CHERREE	ALMON
41	AMBRIA	ALMON
42	CRYSTAL	ALPERS
43	ERIK	ALVAR
44	NAARI	ALYSSE
45	DAVID	AMEDEO
46	FELICIA	AMES

No.	First Name	Last Name
47	AQUINO	ANDERS
48	LORI	ANDERSON
49	RANDY	ANDERSON
50	VICTORIA	ANDERSON
51	CHAROLETTA	ANDERSON
52	TANYA	ANDERSON
53	ROGELIO	ANDRADE
54	JUAN	ANDRADE
55	FREEMAN	ANKUNDING
56	CHARLES	ANNING
57	FRANCES	ANTHONY
58	TATIANA	ANTHONY
59	YASMIN	ANWAAR
60	TOBECHUKWU	ANYIGBO
61	NICOLE	ANZALONE
62	ROSA	APARICIO
63	ROOSEVELT	APPLING
64	ANA	ARAGON
65	PATRICK	ARCEMENT
66	KAREN	ARGUELLO
67	EDGARD	ARIAS
68	JEAN CARLOS	ARIAS TROISI
69	CYNTHIA	ARIAZ
70	MARIA	ARROYO
71	VICTOR	ARTEAGA
72	RAN	ARVIV
73	DEONTA	ASHLEY
74	LAURIE	ASTERN
75	LAURA	ATKINS
76	STEPHEN	AUERBACH
77	SHEKITA	AUSTIN
78	JEFFERSON	AVEA
79	WILSON	AWAL
80	DANIEL	AXTON
81	KIMBERLY	BABCOCK
82	JESNAIRA	BAEZ
83	JIVER	BAEZ
84	HEATHER	BAGWELL
85	CRAIG	BAILEY
86	JONELLE	BAILEY
87	MIKEY	BAIRHALTER
88	MICHAEL	BAKER
89	JEREMIAH	BAKER
90	HOPE	BALDINGER
91	JENNY	BALL
92	SAMANTHA	BALL

No.	First Name	Last Name
93	ALFREDO	BALLON
94	DARINA	BAMBER
95	SHANIYA	BANKS
96	NIAMIAH	BANKS
97	LAUREN	BARANCO
98	CLORTIA	BARBEE
99	WILLIE	BARBEE
100	KEVIN	BARKER
101	KEVIN	BARKER
102	YOLANDA	BARKER
103	LESLIE	BARKLEY
104	SAMUEL	BARNES
105	ROOSEVELT	BARNES
106	GARY	BARNES
107	RAJUAN	BARNES
108	GLORIA	BARONA
109	ANTON	BARR
110	ALEJANDRA	BARRAZA
111	CHANNEA	BARRON-HUNTER
112	LORNA	BARTLEY
113	SHAWNA	BARTON
114	JESSICA	BASKETT
115	AJ	BATCHELOR
116	MARTÃ-N	BATEN
117	GEORGE	BATES
118	SABRINA	BATES
119	DARRIN	BATES
120	CHINA	BATTLE
121	KELLY	BAUER
122	CARLOS	BAUTISTA
123	NALINI	BAVDA
124	THOMAS	BAXA
125	GUANNA	BEAN
126	AIRREUS	BEASLEY
127	ANA	BEATO
128	TABITHA	BECKER
129	GREGORY	BECTON
130	JOSHUA	BEGEMAN
131	RYAN	BELL
132	BRANDON	BELL
133	JAMES	BELL
134	SHONTONIA BELL	BELL
135	VERONICA	BELMONTE
136	ROSSI	BENCOSME
137	JODY	BENDER
138	ANGELA	BENHAM

No.	First Name	Last Name
139	ROBERT	BENHAM
140	VERENICE	BENITEZ
141	TAMARA	BENNEY
142	WILLIAM	BENNINGHOFF
143	KELLY	BERRY
144	FELICIA	BERRY
145	LESHONDA	BERRY
146	JONATHAN	BESSENT
147	DHRUPAD	BEZBORUAH
148	JARED	BLACK
149	KIESHA	BLACK
150	LAUREN	BLACK
151	DOMINIQUE	BLACKBURN
152	CHEEMOANDIA	BLAKE
153	NYESHA	BLAKES
154	LEVAN	BLALARK
155	NYASIA	BLAN
156	TERRI	BLAZER
157	BERTHA	BOAMAH
158	EVANS	BOATENG
159	MARC	BOCANEGRA
160	AMALTAS	BOHRA
161	ANNA	BOLD
162	SHANNON	BOLDEN
163	STEPHANIE	BOLTE
164	MICHELLE	BOLTON
165	ALICIA	BOND
166	WILLIAM ISSAC	BOND
167	ROGOVIN	BOOKER
168	TAYLOR	BOOSE
169	ERICA	BOOTH
170	DENEEN	BORNER
171	JEFF	BOURDET
172	ERIC HERSCHEL	BOWEN
173	JASMINE	BOWERS
174	KAMILAH	BOWIE
175	KRISTI	BOWMAN
176	TYLER	BOWRING
177	MELISSA	BOYD
178	CARMELITA	BOYD
179	PAXTON	BOYKINS
180	PAXTON	BOYKINS
181	TOYA	BRADFORD
182	SAMELLA	BRADLEY
183	JAMES	BRADLEY
184	MICHAEL	BRADSHAW

No.	First Name	Last Name
185	JASON	BRANCH
186	TAMIKA	BREWER
187	BECKY	BREWSTER
188	TERESA	BRIDGES
189	ELBERT	BRIDGES II
190	NATHAN	BRINK
191	JAMES	BRINKERHOFF
192	QUINTON	BRINKLEY
193	JEANETTE	BRITTON
194	JASON	BRODY
195	SHAUNDRA	BROOKS MINNIFEE
196	SHARIYA	BROTHERN
197	RICHARD	BROWN
198	LEON	BROWN
199	JEAN	BROWN
200	CRYSTAL	BROWN
201	PAMELA	BROWN
202	SHAMEKIA	BROWN
203	KELSEY	BROWN
204	STEPHANIE	BROWN
205	NEHEMIAH	BROWN
206	SHERRIE	BROWN
207	JOSEPH	BROWN
208	KAYLA	BROWN
209	ANN	BROWN
210	LOUIS	BROWN
211	BONITA	BROWN
212	JENNIFER	BROWN
213	KIMBERLY	BROWN
214	JACOB SC	BRUCE
215	JOSHUA	BRULE
216	EDUARDO	BRUM
217	MARLEN	BRUNCH
218	ANTONIO	BRUNT
219	ANETA	BRYLKOWSKA
220	MOENICA	BUCHANAN
221	KELLY	BUCZEK
222	MARTINO	BUGG
223	ANDREW	BULICEK
224	LUKE	BULICEK
225	JALEN	BULLINER
226	NAKIA	BULLINER
227	PATRICIA	BULLOCK
228	BRIANA	BUNSEE
229	ELLIE	BURGE
230	ROBERT	BURKE

No.	First Name	Last Name
231	SHIRLEY	BURKS
232	ALAN	BURNHAM
233	PARIS	BURNOM
234	TAMMY	BURNS
235	CHAD	BURTON
236	KORI	BURTON
237	JANIS	BUSBEE
238	LESTER	BUSH
239	CHAD	BUTLER
240	CHERYL	BUTLER
241	LILIANA	CABA
242	LOU JONATHAN	CABRERA
243	KATHY	CAFAZZO
244	RONALD	CAGGIANO
245	SHIRLEY	CALUMPONG
246	KONOSHA	CALVIN
247	PANDORA	CAMPBELL
248	DIAMOND	CAMPBELL
249	CHELSEY	CANADA
250	KELYN	CANALES
251	JESSICA	CANO
252	STEVEN	CANTY
253	JEANNE	CAPACHIN
254	SHEILA	CAPITOSTI
255	ANTONIO	CARDOZA
256	VENNIT	CARLVIN
257	NATALIA	CARMODY
258	BOBBI	CARR
259	VIVIANA	CARRERA
260	DONNA	CARROLL
261	MATTHEW	CARROLL
262	JOANNA	CARROLL
263	MICHAEL	CARSON
264	ALAN	CARSTENS
265	DIAMOND	CARTER
266	TAMIKA	CARTER
267	IRIS	CARTHER
268	HAYDEN	CASALI
269	BRENDA	CASE
270	CARMEN	CASIANO
271	FRANK	CASS
272	MARKELL	CASTER
273	VERONICA	CASTILLO
274	CARLOS	CASTILLO
275	ERNESTO	CATALAN
276	TANIKA	CATER

No.	First Name	Last Name
277	DANIEL	CATUCCI
278	JAKEVIOUS	CAUTHEN
279	SABRINA	CELAYA
280	ROSS	CELLAMARE
281	VERONICA	CERTUCHE
282	MARÃ-A	CERVANTES
283	KATHY	CERWIN
284	STWVEN	CHAD
285	CHANCE	CHAMBERS
286	JENNIFER	CHANDLER
287	ISIAH	CHANEY
288	STARLEAN	CHAPMAN
289	TONI	CHARLES
290	SEAN	CHARRAN
291	NIRAJ	CHAURASIA
292	SARA	CHAVEZ
293	RANGEL	CHAVEZ
294	ALMA	CHAVEZ
295	SARA	CHAVEZ
296	DEMETRIA	CHESTER
297	COURTNEE	CHILDERS
298	MICHAEL	CHINN
299	CATHERINE	CHISEM
300	JEFFREY	CHOMIN
301	ABHISHEK	CHOUDHARY
302	BARBARA	CHOY
303	COPE	CHRISTAN
304	ROBERT	CHRISTIAN
305	JESSICA	CIFELLI
306	VINCE	CIMINO
307	EMMANUEL	CISTERNAS
308	SHAMIKA	CLANTON
309	WILLIE P	CLARK
310	YOLANDA	CLARK
311	LATRICE	CLARK
312	SHARON	CLARK
313	FELIPE	CLARK
314	DANIELLE	CLARK
315	PATTY	CLAVESILLA
316	SHERI	CLAWSON
317	JUSTICE	CLAY
318	JAMES	CLAYBURN
319	CAROL	CLEM
320	KANISHA	CLEMENTS
321	HOLLY	COBB
322	JAMES	COBB

No.	First Name	Last Name
323	TREVA	COBB
324	KRISHON	CODE
325	LATISHA	COE
326	JENNIFER	COFFELT
327	CORNELIUS	COHEN
328	CHELSEY	COLE
329	MICHAEL	COLE
330	MACK	COLEMAN
331	DAJAUNIA	COLEMAN
332	CHRISEAN	COLEMAN
333	CORNEISHA	COLEMAN
334	DEASHA	COLEMAN
335	STEPHANIE	COLEMAN
336	LATRINA	COLLAY
337	VENUS	COLLIER
338	SHERMAIN	COLLINS
339	ANGEL	COLMENARES
340	EDWARD	COLON
341	LAUREN	COMBS
342	JEFFERY	COMBS
343	JERMAKA	COMMON
344	ASHLEY	CONEJO
345	JO-ANNE	CONKLIN
346	MARCUS	CONLEY
347	JERALD	CONNER
348	ANA	CONTRERAS
349	MA GUADALUPE	CONTRERAS
350	APRIL	COOPER
351	RITA	CORKER TURNER
352	GUADALUPE	CORNEJO
353	CORETTA	CORNELIUS
354	DANIEL	CORRAL
355	DENNIS	CORSI
356	SANDRA	CORTES
357	JAZMIN	CORTEZ
358	LYDIA	COSTAS
359	KAREN	COSTELLO
360	KATHY	COTTER
361	KEVIN	COTTINGHAM
362	DANEIL	COULTHARD
363	MIRNA	COVARRUBIAS
364	KYLASHAE	COX
365	LINDSAY	COX
366	KEISHA	COX
367	SEAN	COYLE
368	BRANDY	CRAFT

No.	First Name	Last Name
369	BRIANNA	CRAIG
370	ANTHONY	CRAWFORD
371	TALECIA	CRAWFORD
372	ANDREW	CREELMAN
373	KEN	CROSBY
374	ROYCE	CRUICKSHANK
375	KARINA	CRUZ
376	RUFINA	CRUZ
377	CHRISTINE	CRUZ
378	ORLANDO	CRUZ
379	JEANICE	CUMMINGS
380	CHARLES	CUNNINGHAM
381	CHRISTOPHER	CUNNINGHAM
382	JAMAYA	CURNEY
383	VANESSA	CURTIS
384	ANTHONY	CZAPLINSKI
385	DAVID	CZUPTA
386	CHARLES	DAILEY
387	CYNTHIA	DALEY
388	JANET A	DALTON
389	DIANE	DAMORE (D'AMORE)
390	SHERONE	DANIELS
391	JANAY	DANIELS
392	NICOLE	DANIELSON
393	DAWN	DASILVA
394	TIFFANY	DAUGHERTY
395	BROWN	DAVID
396	KIM	DAVIESSALAHUDDIN
397	DENISE	DAVILA
398	SHARON	DAVIS
399	CERENA	DAVIS
400	BRIAN	DAVIS
401	SONIA	DAVIS
402	AMBROZINE	DAVIS
403	CHAUNCY	DAVIS
404	RAYMONT	DAVIS
405	KEAMBRE	DAVIS
406	JEANNETTE	DAVIS
407	TYRONE	DAVIS
408	WYNTER	DAVIS
409	JULIE	DAVIS
410	ANGILA	DAWSON
411	REGINA	DAY
412	NANCY	DE LEON
413	MEOSHA	DEAR
414	SHERRI	DEEM NORMAN

No.	First Name	Last Name
415	ANAYATCIN	DELGADO
416	CYNTHIA	DEMERY
417	LYNETTE	DENESHA
418	ANNE	DENG
419	LAKISHA	DENT
420	MARCUS	DENT
421	LINDARA	DENTON
422	JASHA	DENZMORE
423	RUBEN	DESANTIAGO
424	JOHANNA	DESANTIAGO
425	CHRISTOPHER	DESGEORGES
426	AZUCENA	DIAZ
427	INOCENTE	DIAZ
428	GUILLERMO	DIAZ
429	YDELMA	DIAZ
430	CHERYL	DIMAGGIO
431	LINDA	DITTRICH
432	KAHMUNI	DIXON
433	LATANGELA	DIXON
434	ANDREA	DIXON
435	JULIE	DOBIN
436	JOHNNY	DOE
437	ELAINE	DONLEY
438	LLOYD	DONNELL SR
439	JEAN	DONNELLY
440	FREDDY	DONNELLY
441	RAGHAVENDER	DONURU
442	EDWARD	DOODY
443	JO	DOORNBOS
444	KELVIN	DORDEN
445	TIMARA	DORTCH
446	QUANITA	DOSSETT
447	SERRITA	DOUGLAS
448	ALECIA	DOUSSA
449	ANGEL	DOWELL
450	JAMIE	DOWNES
451	CAITLIN	DOWNEY
452	EUNICE	DOWNS
453	EVGUENI	DROVETSKI
454	DOUGLAS	DRUMHELLER
455	EVELYN	DUARTE
456	BENJAMIN	DUBUC
457	ILICIA S.	DUKES
458	DENNIS	DULAY
459	SHANNA	DUNCAN
460	BETTIE	DUNCAN

No.	First Name	Last Name
461	BARBARA	DUNN
462	DEBORAH	DURANTE
463	GINA	DUTTON
464	DONALD	DYE
465	PRISCILLA	DYER
466	HEATHER	EADS
467	JUSTIN	EASON
468	SAMANTHA	EBNER
469	LOWELL	EDDINGS
470	SYLESTINE	EDWARD
471	EDDIE	EDWARDS
472	LAFLORE	EDWARDS
473	DYLAN	EILAND
474	BEVERLY	ELKINS
475	SCOTT	ELLENTUCH
476	ANDREW	ELLINGHAUSEN
477	MICOLE	ELLIS
478	JULIAS	ELLIS
479	GREGORY	ELLISON
480	MITCHELL	EMAHISER
481	CHRIS	EMERSON
482	UJU	ENENDU
483	TAMARA	ENG
484	DIANE	ENGELSBEL-FARRIS
485	BRANDON	ENGLE
486	DOUGLAS	ERICSON
487	MARIO	ESPANA
488	GERARDO	ESPINOZA
489	SHAWN	ESSEX
490	DAISY	ESTRADA
491	ANDREW	ETHERIDGE
492	HERVE	ETIENNE
493	JAVANA	EUTSEY
494	JACK	EVANS
495	MARCHELL	EVANS
496	JENNIFER	EVANS
497	CHANTERLLA	EVANS
498	MARCHELL	EVANS
499	KIMMY	EVILSIZER
500	MAUREEN	FAINBERG
501	LATOYA	FAIR
502	TRANDON	FALLS
503	ROSALIE	FANLO
504	ELI	FANNIN
505	BRIAN	FARCASI
506	JENS-INGO	FARLEY

No.	First Name	Last Name
507	DARNELL	FAUST
508	JACQUELINE	FAUSTO
509	ALEJANDRA	FAUSTO
510	LATANYA	FAUST-RODGERS
511	IESHA	FENDERSON
512	IDA	FERGUSON
513	VANESSA	FERGUSON
514	LEOLA	FERGUSON
515	YURI	FERNANDEZ
516	SANTIAGO	FERNANDEZ-GOMEZ
517	OLIVER	FERRIGNI
518	BRIAN	FERRON
519	MARCUS	FIORE
520	MARGARET	FISHER
521	EUGENE	FISHER
522	BETTY	FISKUM
523	SARAH	FLAMM
524	PATRICIA	FLANIGAN
525	ERIN	FLANNERY
526	BERNICE	FLEMINGS
527	PATRICE	FLEMONS
528	TESHIMA	FLETCHER
529	CHRISTOPHER	FLETCHER
530	ANTHONY	FLINT
531	MARIBEL	FLORES
532	EFREN	FLORES
533	CARLOS	FLOREZ
534	FER-PASCAL	FLOWERS
535	DOROTHEA	FLOWERS
536	JIMMIE	FLOWERS
537	RENEE	FLUTE
538	TYRONE	FONG
539	MICHAEL	FORD
540	DEANGELO	FORD
541	WAYNE	FORESTER
542	EVITA	FORGUE
543	JACQUELINE	FOSDICK
544	RONALD	FOSTER
545	ARTHUR	FOSTER
546	APRIL	FOSTER
547	TREYON	FOSTER
548	BRANDON	FOSTER
549	RAVEN	FOSTER WRIGHT
550	JOSEPH	FOX
551	STARR	FRAKES
552	STEVE	FRANCIS

No.	First Name	Last Name
553	ELIZABETH	FRANCISCO
554	TAWANDA	FREEMAN
555	WYLEIA	FREEMAN
556	AUDREY	FREUDBERG
557	A Y	FRICK
558	RYAN	FRITZ
559	CATHERINE	FROMM
560	DENISE	FULLER
561	CHRISTOPHER	FURNEY
562	MARIA	G HERNANDEZ
563	ABIGAIL	GABOUREL
564	STEPHANIE	GALARZA
565	MIKIA	GALLOWAY
566	JEREMY	GAMBLE
567	JACK	GAMMON
568	TAWNY	GAPINSKI
569	ROSALBA	GARCÍA-A
570	ALEXANDER	GARCIA
571	KAREN NAYELI	GARCIA
572	KRISTINA	GARCIA
573	RAFAEL	GARCIA
574	BRENDEN	GARCIA
575	SARAH	GARCIA
576	DIANA	GARCIA LONDONO
577	MARTHA ANNE	GARDNER
578	DONIESHA	GARDNER
579	JESICA	GARFIAS
580	TRAVIS	GARNETT
581	DESIRAE	GARRETT
582	MARK	GARRISON
583	MAMIE	GARY
584	ADRIAN	GARY
585	PHILLIP	GARZA
586	ANGELIA	GATES-WILLIAMS
587	BILLIE	GATEWOOD
588	MELISSA	GATLIN
589	MONICA	GAUDIO
590	JAMES	GAWITH
591	PORCHA	GENTRY
592	GRIGOR	GEORGIEV
593	JOY	GERMAN
594	AMY	GEROUX
595	DEBBIE	GIBSON
596	SARAH	GIBSON
597	DWAYNE	GIBSON
598	ANTHONY	GIERBOLINI

No.	First Name	Last Name
599	KIERRA	GILBERT
600	SAVANNAH	GLEESON
601	SHARIECE	GLOVER
602	LEV	GOLBERT
603	JOSE	GOMEZ
604	IVAN	GOMEZ
605	ASHLEY RAE	GOMEZ
606	JILMA	GOMEZDE RODRIGUEZ
607	MICHELLE	GONZALES
608	KAREN	GONZALEZ
609	CARLOS	GONZALEZ
610	ALMA	GONZALEZ
611	MELISSA	GONZALEZ
612	DEONTRE	GOODEN
613	GABRIELLE	GOODMAN
614	RUTH	GOODSON
615	CHANTEL	GORDON
616	ANGELA	GORDON
617	FELICIA	GORMAN
618	KRISTINE	GORNTTO
619	LUDWIK	GORZANSKI
620	RODERICK	GOTTLIEB
621	STEPHEN	GOUDREAULT
622	ISAIAH	GRACE
623	TARA	GRAHAM
624	JOHN	GRAHAM
625	JOSHUA	GRAHAM
626	JASMINE	GRANDISON
627	KATHRYN	GRANT
628	LATEANNA	GRANVILLE
629	SHANA	GRAVEA
630	CHRISTOPHER	GRAVES
631	CLYDE	GRAVES
632	DAVID	GREEN
633	LEZZETTE	GREEN
634	LATASHA	GREEN
635	NYKESHA	GREEN
636	TAMMIE	GREEN
637	SHANEAL	GREENE
638	RUTH	GREER
639	IAN	GREGORY
640	CAROL	GREIG
641	KIMBERLY	GRIFFIN
642	SHAIKELA	GRIFFIN
643	TIAIRA	GRIFFIN
644	TROY	GRIFFITH

No.	First Name	Last Name
645	ANTHONY	GRINBARG
646	SANTERA	GROOMS
647	ROSELLA	GROVES
648	TYRELL	GRUBBS
649	ADAM	GRUBER
650	ANA	GUERRER
651	SHEILA	GUERRERO
652	MIGUEL	GUILLEN
653	JULIO	GUILLEN
654	GLINDA	GUNN
655	ASHLEY	GUTIERREZ
656	ERVIN	GUZMÁN
657	JOHANNA	GUZZIE
658	AIDAN	HAKIMIAN
659	MAIYA	HALL
660	LENORA	HALL
661	JOSHUA	HAMACHER
662	THOMAS	HAMBURY
663	SCOTT	HAMILTON
664	PATRICK	HAMMERS
665	GWENDOLYN	HAMPTON
666	BRETT	HANEBRINK
667	DAVID	HANKS
668	SHELIA	HANNAH
669	SUSAN	HARDING
670	MONICA	HARDY
671	MARVA	HARLAN
672	WILLIE	HARMON
673	LENA	HARPER
674	KINZIE	HARRIS
675	PARIS	HARRIS
676	ASHANTI	HARRIS
677	LYDIA	HARRIS
678	KAYLA	HARRIS
679	TIMOTHY	HARRIS
680	MONEEKA	HARRIS
681	TAMIKO	HARRIS-MORRISON
682	DORIS	HARRISON
683	DEON	HARRISON
684	HOWARD	HARRISTON
685	JONATHAN	HART
686	SHAMEILLE	HART
687	ALIZE	HARTISON
688	LYNWOOD	HARVEY
689	ALI	HASSAN
690	BRENDA	HASSEN

No.	First Name	Last Name
691	EDNA	HATTEN
692	SARA	HAWES
693	WILLIAM DARYL	HAWK
694	AMYA	HAWKINS
695	CARL	HAYDEN
696	THOMAS	HAYES
697	STEVEN	HAYES
698	MCKENZIE	HAYNES
699	AIRELLE	HAYNES
700	LISA	HAYNES
701	ASHLEY	HAYWOOD
702	TRACY	HEAD
703	DERRICK	HEAD
704	KRYSTLE	HEARD
705	APRIL	HEATLEY
706	LEVI	HEBERT
707	SCOTTIE	HEGMANN
708	SCOTT	HEINRICH
709	MARGIE	HEINSZ
710	CORI	HENDERSON
711	MARGARET	HENDERSON
712	JABEZ	HENDRIX
713	DORIS	HENLEY
714	GEORGIA	HENRY
715	LASEAN	HENRY
716	KATHY	HENSHAWCOLLIER
717	JONATHAN	HENSLER
718	JOHN	HERMAN
719	STEPHAN	HERMAN
720	VERONICA	HERNANDEZ
721	ISRAEL	HERNANDEZ
722	YESENIA	HERNANDEZ
723	MARTIN	HERNANDEZ
724	ALEYDA	HERNANDEZ
725	APRIL	HERNANDEZ
726	VILMA	HERNANDEZ
727	GABRIEL	HERNANDEZ
728	JULIE	HERNANDEZ
729	JASON	HERNDON
730	MAX	HERRERA
731	OFELIA	HERRERA
732	MARISSA	HERRERA
733	JAZLEEN	HERRERA
734	KYANNA	HESTER
735	LONNIE	HESTER
736	LONNIE	HESTER

No.	First Name	Last Name
737	BELINDA	HICKS
738	JUAN	HILBURN
739	TONEY	HILL
740	TIA	HILL
741	DESIRAY	HILL
742	IESHA	HILL
743	CORDERO	HILL
744	SUSAN E	HILL
745	TERRENCE	HILLIARD
746	ALLENE	HILLIARD
747	MARZEL	HINKLE
748	NICOLE	HINRICHS
749	EILEEN	HIRSCH
750	MADELINE	HOARD
751	JEFFERY	HOBBS
752	JAMES	HODGE
753	PATRICIA	HOGANS
754	TERRI	HOLLAND
755	BRIGITTE	HOLLAND
756	CHARLOTTE	HOLLINS
757	CHRISTOPHER	HOLLOMON
758	LONNIE	HOLMAN
759	KIMBERLY	HOOD
760	ROSCOE	HOOD
761	KELLI	HOOD
762	VIRGIL	HOOPER
763	DANIEL	HOOVER
764	JAMES	HOPE
765	MATTHEW	HORAN
766	ROBBIE	HORTON
767	JAQUAN	HORTON
768	VANESSA	HOSKINS
769	BRYAN	HOUSEL
770	RAQUEL	HOUSLEY
771	TAN6	HOWARD
772	MAURICE	HOWARD
773	KENNY	HOWARD
774	RICHARD	HOWIE
775	WARREN	HOYLE
776	IGOR	HRISTOVSKI
777	BRYANNA	HUBBARD
778	THELMA	HUEL
779	MELISSA	HUERTA
780	LAWANDA	HUGHES
781	VICTORIA	HUGHES
782	INEZ	HUMBLES

No.	First Name	Last Name
783	LORENZO	HUNT
784	VAMIA	HUNTER
785	EMILY	HUPF
786	BRITTANY	HURD
787	CAROLINE	HURLEY
788	CATHY	HURLEY
789	OCTAVIUS	HURST
790	BRANDON	HURST
791	MICHELLE	HURTZ
792	JULIE	HUSKEY
793	NOAH	HUTH
794	I WANT FUCKED YOU M	I WANT FUCKED YOU S
795	WHITNEY	IRBY
796	DOROTHEA	JACKSON
797	MARK	JACKSON
798	CHANCE	JACKSON
799	JASON	JACKSON
800	DOMINIQUE	JACKSON
801	ANTHONY	JACKSON
802	GODDIE	JACKSON
803	MARY	JACKSON
804	CHAUNTEL	JACKSON
805	BATOO	JAFFERI
806	BRIANA	JAMES
807	MICHAEL	JARVIS
808	MILCA	JASMIN
809	STEVIE	JEFFERSON
810	VIRGINIA	JEFFERSON
811	JUDY	JEFFRIES
812	DAMONTE	JENKINS
813	JOEL	JOEL MEDINA
814	LATISHA	JOHNSON
815	TASHAUN	JOHNSON
816	RANDY	JOHNSON
817	SANDRA	JOHNSON
818	DANIELLE	JOHNSON
819	JAMES	JOHNSON
820	SHENEQUA	JOHNSON
821	LATRACY	JOHNSON
822	EBONY	JOHNSON
823	IDELLA	JOHNSON
824	IDELLA	JOHNSON
825	CHRISTINE	JOHNSON
826	FLORIANNE	JOHNSON
827	DARLENE	JOHNSON
828	ROBERT	JOHNSON

No.	First Name	Last Name
829	LINDA	JOHNSON
830	DONALD L	JOHNSON
831	TIFFANY L.	JOHNSON
832	DANIELLE	JOHNSON
833	LAQUESHA	JOHNSON
834	ALETHEA	JOHNSON
835	LATOYA	JOHNSON
836	MARCUS	JOHNSON
837	DANIELLE	JOHNSON
838	IRENE	JOHNSON
839	MALIK	JOHNSON
840	HELEN	JOHNSON
841	CHAUNTE	JOHNSON
842	DERRICK	JOHNSON
843	DEMETRIUS	JOHNSON
844	SHENEQUA	JOHNSON
845	JORDUN	JOHNSON
846	LATASHA	JOHNSON
847	LISA	JOHNSON
848	SABRINA	JONES
849	DAMION	JONES
850	DOMINIC	JONES
851	LORETTA	JONES
852	KARLA	JONES
853	DERRICK	JONES
854	ZACKERY	JONES
855	HENRY	JONES
856	PRENTISS	JONES
857	MORKEISHA	JONES
858	TORRIE	JONES
859	TYIONA	JONES
860	CURTIS	JONES
861	CHAD	JONES
862	BILL	JONES
863	HOLLANE	JORDAN
864	ALICE	JORDAN
865	TASIA	JORDEN
866	ASHLEY	JUNDT
867	ANTHONY	KAHNY
868	BHAVNA	KALARIA
869	FRANCESCA	KALLEMEYN
870	MACENNA	KAMROWSKI
871	GREGORY	KATZ
872	NICHOLAS	KEEN
873	MELANEE	KELEMAN
874	JOHN	KELLY

No.	First Name	Last Name
875	CHIQUITA	KELLY
876	ANIYAHA	KENNEDY
877	SHANNON	KENT
878	GWENDOLYN	KENT
879	FAITH	KERR
880	COLE	KERSHNER
881	CHRISTY	KETZ
882	TREVOR	KEZON
883	LYDIA	KHALIL
884	KEAT SIM	KHOO
885	JAMIE	KICKERY
886	SANG-HOON	KIM
887	KAYLA	KIMMELL
888	CARISA	KING
889	MERCEDES	KING
890	JAMES	KING
891	JALANA	KIRK
892	MARCIA	KIRK
893	DAWN	KITE
894	ALEX	KIZER
895	HEATHER	KLAUS
896	KIWANE	KNOX
897	MICHAEL	KOETTING
898	IRYNA	KOT
899	CHRISTY	KOZUCH
900	DIANE	KROHN
901	MARK	LACEY
902	HENRY	LACLAIR III
903	SUSANA	LAIZ
904	SUSANA	LAIZ
905	JOANNE	LAMBERT
906	JACQUELINE	LAMBERT
907	TERRY	LAMPEL
908	TIANNA	LAMPLEY
909	OMAR	LAMPLEY
910	TIM	LAND
911	LUSINA	LANDA
912	JEFF	LANDE
913	ESMERALDA	LANDIN
914	PATTY	LANE
915	KAREN	LANGSTON
916	LISA	LANKHAMDAENG
917	JOSE AMAURIS	LANTIGUA MEJIA
918	MICHAEL	LAPON
919	JUANA	LARA
920	KAIA	LARSON

No.	First Name	Last Name
921	JUANTAE	LARTHERIDGE
922	ANASTASIA	LATMAN
923	CHRIS	LAWRENCE
924	KEYWON	LAWSON
925	RALPH	LEAVELL
926	ALFREDO	LEDESMA
927	SONYA	LEE
928	IRENE	LEE
929	BONNIE	LEEDY
930	MICHAEL	LEFLORE
931	CYNTHIA	LEIRD
932	DEVIN	LENOIR
933	SOFIA	LEON
934	CHRISTOPHER	LEPHONG
935	LACEE	LEVERETT
936	BRIAN	LEVESQUE
937	KIM	LEWIS
938	MARC	LEWIS
939	MICHAEL	LIA
940	DANIEL	LICIDO
941	KATIE	LIGHTY
942	TRUDY	LINAM
943	NAKITHA	LINDSEY
944	ROBIN	LINDSEY
945	LAVERN	LINO
946	DEASHE	LINWOOD
947	JUDITH	LISTER
948	JULIET	LISTER
949	TIFFANY	LITES
950	MICHAEL	LITTLE
951	GWENDOLYN	LITTLE
952	SHARON	LIVERS
953	TANASIA	LLOYD
954	ROLITA	LOFTON
955	TAMARA	LOLLAR
956	RASHEED	LONG
957	ROMULUS	LOPEZ
958	RAQUEL	LOPEZ
959	HUGHES	LORI
960	BECKY	LOUCKS
961	JILL	LOVE
962	ANN	LOVE
963	JEREMY	LOVEDAY
964	STEPHEN	LOZINSKI
965	GIL	LOZOYA
966	DAMIEN	LU

No.	First Name	Last Name
967	JACQUELINE	LUCKEY
968	XIMENA	LUDENA
969	SAMANTHA	LUEBKE
970	JOHN	LUMB
971	MARIA	LUNA
972	JULIO	LUNA
973	THOMAS	LUNSFORD
974	CHRISTIAN	LUYE
975	GRANT	LYNDE
976	DAWN	M LISTENFELT
977	SANDRA	MÄ¼LLEROVÄi
978	OMAE	MAALI
979	MICHAEL	MABON
980	ANNETTE	MACK
981	SHANNON	MACK
982	KESHANA	MACKEY
983	GEORGE	MACLACKLIN
984	BRENDA	MACON
985	JOELEEN	MAESTRO
986	JARROD	MAGEE
987	JOSHUA	MAGNONE
988	TRACI	MAGSAMEN
989	RICHARD	MAHALICK
990	ARELI	MALDONADO
991	CHERYL	MALECKI
992	SEMECRIA	MAMON
993	MIKE	MANDERINO
994	SUSAN	MANGINO
995	LAKENDA	MANNING
996	MEHROZ	MANSOOR
997	THOMAS	MARCHITTO
998	BERTHA	MAREZ
999	JAMES	MARIEN
1000	CHANA	MARKOWITZ
1001	TIARA	MARKS
1002	DONNA	MAROTTE
1003	ANDREW	MARSH
1004	HUDSON,	MARSHA
1005	JOSEPH	MARSHALL
1006	DULCE	MARTÄ-NEZ
1007	WILLIAM	MARTIN
1008	MEGAN	MARTIN
1009	LARRY	MARTIN
1010	SANDRA	MARTIN
1011	ALVIN	MARTINEZ
1012	MARILYN	MARTINEZ

No.	First Name	Last Name
1013	LUISA	MARTINEZ
1014	JEFFREY	MARTINEZ
1015	EDWIN	MARTINEZ
1016	ARMANDO	MARTINEZ
1017	MARGARITA	MARTINEZ
1018	SUSANA	MARTINEZ ORTIZ
1019	KRISTAL	MARTINEZ-LOPEZ
1020	HEIDI	MASON
1021	TIFFANY	MASON
1022	SHANISHA	MASSEY
1023	TRAVON	MASSEY
1024	SHARON E	MASSEY
1025	ARTHUR	MASYUK
1026	DIANN	MATLOCK
1027	ANISLEY	MATOS
1028	SHIRLEY	MATTHEWS
1029	CINDY	MATUSZEWSKI
1030	PARISE	MAXEY
1031	MELVINA	MAYO
1032	JOHANNA	MAYOS
1033	RAY	MCADAMS JR
1034	BRIAN	MCCABE
1035	DAWN	MCCANN
1036	JEREMIAH	MCCASKILL
1037	KAHDEJAH	MCCASTER
1038	SARAH R	MCCLAIN
1039	TAMIKA	MCCLAIN
1040	CHRISTINE	MCCLAINE
1041	ANGELA	MCCLENDON
1042	JANITA	MCCLUNG
1043	JEFFREY	MCCLURE
1044	MALISSA	MCCULLOUGH
1045	DAKOTA	MCDANIEL
1046	RAYMOND	MCDONALD
1047	TAMIKT	MCDOWELL
1048	DIANE	MCELHANEY
1049	DOUGLAS	MCELHANEY
1050	ARCHIE	MCELRATH
1051	CHRISTOPHER	MCELROY
1052	COURTENAY	MCFARLAND
1053	TIFFANY	MCFARLANE
1054	LAKETA	MCGEE
1055	RUFUS	MCGEE
1056	LOUIS	MCGEE
1057	JERRAD	MCGILL
1058	ANN	MCGOWAN

No.	First Name	Last Name
1059	KATRINA	MCGOWAN
1060	FRANCIS	MCGOWAN
1061	MICHAEL	MCKEE
1062	STEPHEN	MCKOY
1063	DAVE	MCLEAN
1064	JAMES	MCLEASTER
1065	CATRINA	MCLYMOND
1066	IZZIE	MCNEIL
1067	DANNAKA	MCNEILL
1068	DANIELLE	MEDINA
1069	BEATRIZ	MEDINA
1070	MARIA	MEDINA
1071	ROSHAN	MEGHANI
1072	JUAN	MELL
1073	KAISHA	MENARD
1074	JACQUELINE	MENCOS
1075	NADIA	MENDES
1076	JUANA	MENDEZ
1077	CARMEN	MENDEZ
1078	MARINA	MENDIA
1079	CHANEL	MENDOZA
1080	ANA	MENDOZA
1081	JENNIFER	MENDOZA
1082	SANDRA	MERCADO
1083	ADISON	MERIDA
1084	ARETHA	MERRITTE
1085	DANIEL	MESINO
1086	TROY	MESSENGER
1087	LOUISE	METZGER
1088	MICHELLE	MEYERS
1089	ROBERT	MICHELUCCI
1090	MICHELLE	MICKENS
1091	PAYNE	MIKE
1092	JESUS	MILLA
1093	GEORGE	MILLER
1094	TOD	MILLER
1095	IRENAEUS	MILLER
1096	MATTHEW	MILLER
1097	JULIE	MILLER
1098	CAROLINE	MILLER
1099	ANITRA	MILLER
1100	DENISE	MILLER
1101	TIFFANY	MILLER
1102	GREGORY	MILLER
1103	CEDRIC	MILLER-DAVIS
1104	ANGELA	MILLER-PEASTER

No.	First Name	Last Name
1105	HEAVEN	MILLS
1106	DASHEENA	MINIKON
1107	ANGELITA	MIRAMONTEZ
1108	RYAN	MITCHELL
1109	PIERRE	MITCHELL
1110	MARLENE	MITCHELL
1111	JACQUES	MITCHELL
1112	SAMUEL	MOATS
1113	INGER	MOHAMEDYAHYA
1114	MARIO	MOLINA
1115	DONNA	MOLLET
1116	JUDITH	MONAHAN
1117	KELVIN	MONGER
1118	DAWN	MONROE
1119	JAYLENE	MONTALVO
1120	RACHEL	MONTALVO
1121	BILLY	MONTGOMERY
1122	CHAD	MONTGOMERY
1123	KAHJIA	MONTGOMERY
1124	JENNIFER	MOORE
1125	NICOLE	MOORE
1126	ANDRE	MOORE
1127	NICHOLAS	MOORE
1128	CAMERON	MOORE
1129	HENRY	MOORE
1130	LYANNA	MOORE
1131	JESÃS	MORALES
1132	PILAR	MORALES
1133	MARIELA	MORALES
1134	VALERIE	MORALES
1135	SHARON	MORANO
1136	ALEXANDRE	MORCH
1137	VENESSA	MOREHEAD
1138	DENNIS	MORGAN
1139	THOMAS.E	MORGAN
1140	ANTOINE	MORRIS
1141	JESSICA	MORRIS
1142	KIERRA	MORRIS
1143	SHAWN	MORRIS
1144	LISA	MORRIS
1145	JEREMY	MORTON
1146	JACK (LEGALLY JOHN)	MOSES
1147	LATAYLOR	MOSLEY
1148	BRIDGET	MOSLEY
1149	VALERIE	MOSS
1150	TARA	MOSSADAMS

No.	First Name	Last Name
1151	KHAN	MOSTAFA
1152	MONIQUE	MUHAMMAD
1153	AMERA	MUHAMMAD
1154	DEREK	MULLER
1155	LESBY	MUNOZ
1156	ANGELICA	MUNOZ
1157	PATRICIA D	MUNOZ PEREZ
1158	LILLIAN	MUNSON
1159	LORA	MURPHY
1160	DEBORAH	MURPHY
1161	JEROME	MURPHY
1162	DESHAUN	MURPHY
1163	CHRISTY	MURRAY
1164	SHAWNDR	MURRAY
1165	ROBERT	MUTZABAUGH
1166	MARIE	NAGLER
1167	LAURA	NAJERA DE SORIANO
1168	ARTERICA	NALLS
1169	RUPAL	NARANIYA
1170	JORGE	NARANJO
1171	ARNELL	NASH
1172	JOSETTE	NATHANIEL
1173	SALOMON	NAVA
1174	MAGDY	NAWAR
1175	NAJARAI	NAWLS
1176	LEROY	NEALS
1177	GERALD	NEELEY
1178	DANIELLE	NEELEY
1179	HERMAN	NEELY
1180	REBUENER	NELSON
1181	DIANNA	NELSON
1182	MARIE	NEMIRE WILSON
1183	YESSICA	NEVAREZ
1184	STEWART	NEVILE
1185	AQUASHIA	NEVILLES
1186	GREG	NEWCOMB
1187	NGOCTRUC AMY	NGUYEN
1188	MICHAEL	NICHOLSON
1189	DOROTA	NIEDZIELA
1190	MANFRED	NISSLEY
1191	LIBBY	NOBIS
1192	TASIA	NOBLE
1193	JENNIFER	NOLASCO
1194	TAVARIOUS	NORWOOD
1195	SVETLANA	NOVAK
1196	ALLA	NOVAK

No.	First Name	Last Name
1197	JAMES	NOVOTNEY
1198	TYLANDRA	NOWLIN
1199	PATRICK	O NEAL
1200	MARIA	OCA
1201	CARLA	OCFEMIA
1202	SANDI	OCHOA
1203	DEAN	OCHODNICKY
1204	ERIC	O'CONNOR
1205	BENJAMIN	ODONNELL
1206	UBUDDY	OFF MONROE
1207	AYANA	OGHALE
1208	SHARI	OHALLORAN
1209	AIDA	OLAVARRIA
1210	DANILO	OLIVARES
1211	JAIRO	OLIVARES
1212	IRAESHA	OLIVER
1213	JOHN	OLOFSON
1214	MARIAN	OLSON
1215	SABRINA	OPIO
1216	OSCAR	ORDONEZ
1217	VANESSA	ORTEGA
1218	JACQUELINE	ORTIZ
1219	TYRITA	OSBORNE
1220	TYLER	OSBORNE
1221	TYLER	OSBORNE
1222	STEPHAN	OTTO
1223	ASHLIE	OTTOSEN
1224	SEMAJ	OVERTON
1225	CARMELIA	OWENS
1226	EDWARD	PACE
1227	YENE	PADILLA
1228	CHRISTINA	PADOVANI
1229	CYNTHIA	PAGANO
1230	LAMARCA	PAGE
1231	JOHNNY	PALMA
1232	LARNELL	PALMER II
1233	TONY	PALOMA
1234	TENISHA	PARKER
1235	DEBORAH	PARKER
1236	KRISTEN	PARNELL
1237	SNEHAL	PATEL
1238	IZHAR	PATKIN
1239	DONNA	PATTERSON
1240	KENNETH	PATTERSON SR
1241	LISA	PAUL
1242	PHILIP	PELLA

No.	First Name	Last Name
1243	CHERIE	PENNINGTON
1244	LOGAN	PENROD
1245	ELIZABETH	PEREZ
1246	ALEJANDRO	PEREZ
1247	ALEJANDRO	PEREZ
1248	FABIOLA	PEREZ
1249	MARCOS	PEREZ
1250	JUAN	PEREZ
1251	LYDIA	PEREZ
1252	CHRISTINA	PEREZ-PADRON
1253	LORIN	PERITZ-SHARP
1254	VERONICA	PERRY
1255	BILL	PETERS
1256	VICTORIA	PETERS
1257	PERMIQUA	PETERS
1258	ROSS	PETERSEN
1259	DUSHUNTE	PETERSON
1260	CASEY	PETROSKY
1261	RAYMOND	PETTAVINO
1262	CODY	PFAFF
1263	KYLE	PFENNINGER
1264	ASHLEY	PHILLIPS
1265	DEANTE	PÍÑERAS, JR.
1266	MADYSON	PICKENS
1267	AMANDA	PICKENS
1268	MAIRA	PINAL
1269	RUFINA	PINEDA
1270	TORYA	PINKNEY
1271	DARLENE	PINSON
1272	ONTARIO	PIRTLE
1273	CAREONNA	PITCHFORD
1274	ANTHONY	PITTMAN
1275	YOLANDA	PLATA
1276	FELICIA	PLATT
1277	KOSHANDA	POE
1278	ROXANA	PONCIANO
1279	TREY	POORE
1280	JEFF	POPNOE
1281	TERRI	PORTER
1282	ELIZABETH	PORTILLO
1283	MAGDA	PORTILLO
1284	LESA	PRATER
1285	DERECK	PREDOVIC
1286	MELVIN	PRICE
1287	GEORGES	PROUTY
1288	CASSIE	PRUIETT

No.	First Name	Last Name
1289	STEPHANIE	PULISCIANO
1290	CHERYL	PURHAM
1291	LEXI	PUTTICK
1292	DULCE	QUAN
1293	ELISA	QUINONES
1294	JOE	RAINES
1295	BENJAMIN	RALSTON
1296	MALGORZATA	RAMA
1297	SARAH	RAMEY
1298	YESENIA	RAMIREZ
1299	LAZARO	RAMOS
1300	ALEJANDRO	RAMOS
1301	ROBERT	RANDOLPH
1302	RAVIKUMAR	RANGA
1303	KAREN	RANSOM
1304	MARÃ-A	RÃ-OS
1305	JAMES	RASMUSSEN
1306	PEGGY	RAU
1307	BRIANAH	RAY
1308	NATAUNIA	RAY
1309	RAE	RAY
1310	CARA	RAYMOND
1311	MATTHEW	RAYNE
1312	MIGUEL ALEJANDRO	REBOLLAR
1313	DEVIN	REED
1314	SHANNON	REED
1315	DEBORAH	REEK
1316	JABRICE	REESE
1317	KASSANNE	REEVES
1318	DEVIN	REID
1319	JEROMESHA	REID
1320	MISTY	REIGELSPERGER
1321	DARNELL	RELIFORD
1322	ALEXIA	RENDON
1323	CAROLYN	RENGE
1324	CYNTHYA	REYES
1325	ESMERALDA	REYES
1326	REONNA	REYNOLDS
1327	KARA	REYNOLDS
1328	KIMBERLIN	RHODEN
1329	LOUIS	RHYS
1330	JOHNETTA	RICE
1331	SHYKEAA	RICE
1332	SHERNITA	RICHARDSON
1333	NATHANIEL	RICHARDSON
1334	EDWARD	RICO

No.	First Name	Last Name
1335	STEPHANIE	RIDDLE
1336	MEDIA	RIGGS
1337	LEONARD	RIGGS JR
1338	JEREMY	RIGHTON
1339	JULIE	RINCON
1340	BRANDI	RING
1341	REGINALDO	RIOS
1342	MARISOL	RIVAS
1343	RONNIE	RIZZO
1344	JAMEIA	ROACH
1345	MAX	ROBERSON
1346	DORENE	ROBERTSON
1347	SHAUNA	ROBERTSON
1348	JEANETTE	ROBERTSON
1349	TYWIONE	ROBINSON
1350	DEMETRIUS	ROBINSON
1351	ASHAY	ROBINSON
1352	TEANA	ROBINSON
1353	LACHAY	ROBINSON
1354	LARON	ROBINSON
1355	MICHAEL	ROBINSON
1356	MARTHA	ROCA
1357	ANNA	ROCHLIN
1358	JOHN MATTHEW	RODENHISER
1359	ROY	RODGERS
1360	AMBROCIO	RODRIGUEZ
1361	ANTONIA	RODRIGUEZ
1362	JOSE CARLOS	RODRIGUEZ
1363	LUIS	RODRIGUEZ
1364	ALFONSOJRR	RODRIGUEZ
1365	ANGELITA	RODRIGUEZ
1366	CHRISTINA	RODRIGUEZ
1367	MARIO	RODRIGUEZ
1368	DIANA	RODRIGUEZ
1369	GEORGE	RODRIGUEZ
1370	GEOFFREY	ROGERS
1371	MURPHIA	ROGERS
1372	SHELIA	ROGERS
1373	VANESSA	ROGIER
1374	IVON	ROJAS
1375	VIANEY	ROJAS ROMERO
1376	HECTOR	ROMAN
1377	JOEL	ROMERO
1378	ADRIANA	ROMERO
1379	LUKAS	ROSA
1380	JOSEPH	ROSE

No.	First Name	Last Name
1381	ANGELIQUE	ROSE
1382	JOSEPH	ROSENBERGER
1383	DAVETTE	ROSS
1384	RALPH	ROSS
1385	DENNIS	ROSS
1386	WILLIAM	ROWAN
1387	STACI	ROWAN
1388	JORDAN	ROWLS
1389	ERICA	RUCKER
1390	RAUL	RUIZ
1391	SHAWNNA	RUNNING SHIELD
1392	TARIK	RUSSEY
1393	MIKE	RYBKA
1394	MIKE	RYBKA
1395	LORENA	SANCHEZ
1396	ANDRE	SADLER
1397	ROBIN	SAGER
1398	LORRAINE	SAIN
1399	JAHID	SAIYED
1400	EVANGELINE	SALAC
1401	JONDRA	SALARY
1402	VERONICA	SALAS
1403	JUANA	SALAZAR
1404	ESTHER	SALAZAR
1405	JOSE	SALAZAR
1406	NILDA	SALAZAR
1407	JOE	SALDANA
1408	ELISA	SALGADO
1409	SONIA	SALGADO
1410	ROCIO	SALGADO
1411	ERIK	SALGADO
1412	EMILY	SALINAS
1413	JAHMAI	SALLEY
1414	JULIAN	SANCHEZ
1415	PRISCILLA	SANCHEZ
1416	LEON	SANDERS
1417	JOSEPH	SANDMEIER
1418	AUSTEN	SANT
1419	ROSALBA	SANTANA
1420	YESSANIA	SANTANA
1421	MARIA	SANTIAGO
1422	ANISLIZBETH	SANTOS
1423	JONATHAN	SANTOS POLANCO
1424	CLELIA	SARRAPERRE
1425	KEIARA	SATISFIELD
1426	KEITH	SAWYER

No.	First Name	Last Name
1427	RYAN	SAWYER
1428	KATHY	SCHAKEL-CARLSON
1429	JONATHAN	SCHNEIDER
1430	BREANNA	SCHULTZ
1431	JILL	SCHUSTER
1432	JESSICA	SCHWARTZ
1433	CHRISTINA	SCOLERI
1434	DANIELLA	SCOLERI
1435	GÂ€™KEYA	SCOTT
1436	KARLIS	SCOTT
1437	DARREL	SCOTT
1438	CIRRITA	SCOTT
1439	COREY	SCOTT
1440	SIMONE	SCOTT
1441	JULIAN	SEABORN
1442	RICKY	SEAMON
1443	SONYA	SEAWRIGHT
1444	ALEXIS	SECORD
1445	JONATHAN	SEDER
1446	PATRICIA	SEGOVIANO
1447	BRETT	SEIGER
1448	AUDREY	SELLERS
1449	HERBERT	SENDECKI
1450	CHARLES	SEPHUS
1451	EMAZA	SHAFFERS
1452	KANDARP	SHAH
1453	DEENA	SHALES
1454	SUSANNA	SHAP
1455	JAMIE	SHARP
1456	JONATHAN	SHAW
1457	TRACEY	SHEFFIELD
1458	MONCHERRI	SHEPARD
1459	DUANE	SHEPARD
1460	KEANA	SHEPARD
1461	KIMBERLY	SHEPPARD
1462	ANDRE	SHIBA
1463	DENETRIA	SHOEMAKER
1464	ELIZABETH	SHORT
1465	ARIEL	SHORT
1466	FAHAD	SHUTTARI
1467	JOLANTA	SIEBOR
1468	MARIA	SILVA
1469	MARIBEL	SIMENTAL
1470	ANGELA	SIMMEE
1471	SHAUNTAI	SIMMONS
1472	DESHAUN	SIMPSON

No.	First Name	Last Name
1473	ELANA	SIMPSON
1474	WILLIAM	SIMPSON
1475	ROBIN	SIMS
1476	LAMONT	SIMS
1477	VANESSA	SINGLETARY
1478	ROSALAND	SINGLETON
1479	KATARZYNA	SKOWRON
1480	NICHOLAS	SLATE
1481	JENNIFER	SLATER
1482	LAWRENCE	SLOAN
1483	CHRISANDRA	SLONCEN
1484	SHERRY	SMALLS
1485	KARI	SMART
1486	REBECCA	SMILEY
1487	CAMERON	SMITH
1488	ANDREW	SMITH
1489	ROBERT	SMITH
1490	JOE	SMITH
1491	ROMAINE	SMITH
1492	DEVIDA	SMITH
1493	MARIAH	SMITH
1494	ROSHUN	SMITH
1495	KAYLA	SMITH
1496	SIMEAIRA	SMITH
1497	MARY	SMITH
1498	MICHAEL	SMITH
1499	TAMKETA	SMITH
1500	TANEKA	SMITH
1501	DODRICK	SMITH
1502	KAILA	SMITH
1503	ANNETTE	SMITH
1504	I W	SMITH
1505	SAMMIE	SMITH
1506	CHARISSE	SMITH
1507	AKIA	SMITH
1508	DEVIN	SMITHERS
1509	BRIEN	SMOTHERS
1510	MICHAEL	SOKOL
1511	CRAIG	SOLOMON
1512	MICHAEL	SOUTHARD
1513	BRET	SPADER
1514	CORI	SPAIN
1515	MERCEDEZ	SPANN
1516	WILLARD	SPARKS
1517	TYRONDA	SPENCER
1518	DAMIEN	SPENCER

No.	First Name	Last Name
1519	ANTONIO	SPENNATI
1520	RONNI	SPRING JR
1521	MCARTHUR	SQUARE
1522	DAVID	ST JOHN
1523	JAMES	STACH
1524	BERTHA	STAEFE
1525	ERICA	STANFIELD
1526	JEREMY	STANTON
1527	SAVANNAH	STAPLETON
1528	SAVANNAH	STAPLETON
1529	MICHAEL	STARLING
1530	AMARIEL	STATES
1531	ELESHIA	STEELE
1532	SHEILA	STERLING
1533	SHANNON	STEVENS
1534	JSYRE	STEVENSON
1535	CHACE	STEWART
1536	FREDERICK	STILES
1537	JOHN	STIRES
1538	TONYA	STONACKER
1539	SUMMER	STRAND
1540	SHANE	STREET
1541	JOYCE	STRONG
1542	JEMMA	STUBBS
1543	DESTINY	STUBBS
1544	SHAWNA	STUCK
1545	BRIAN	STURM
1546	CHRISTINA	SUE NAVARRO
1547	JEREMY	SULLIVAN
1548	NANCY	SULLIVAN
1549	KEIRA	SULLIVAN
1550	YUKIE	SUZUKI
1551	BAKER	SWEIS
1552	CODY	SWENSON
1553	ERICKSON	SWIFT
1554	RAMON	SY
1555	CHRISTOPHER	SYKES
1556	RODNEY	SYKES JR
1557	NATALIE	SYLVERTOOTH
1558	STACEY	SYMONDS
1559	GORDON	TAM
1560	JACQUELINE	TAPIA
1561	MELISSA	TASSE
1562	SHARDAE	TAYLOR
1563	DONOVAN	TAYLOR
1564	SERENA	TAYLOR

No.	First Name	Last Name
1565	GLORIA	TAYLOR
1566	STEVEN	TAYLOR
1567	MICHELLE	TAYLOR-MANN
1568	REBECCA	TEAGUE
1569	NIESHIA	TEASLEY
1570	AARON	TELLIS
1571	MARIA	TELLO
1572	JOANNA	TENNER
1573	CHARLES	TENPENNY
1574	PHILLIP	TERRELL
1575	TAMISHA	THADYS
1576	SUSAN	THEDA
1577	GARY	THEDA
1578	CHRIS	THOMAS
1579	CHIKA	THOMAS
1580	FRANCES	THOMAS
1581	OTIS	THOMAS
1582	DEANA	THOMAS
1583	TRAVEON	THOMAS
1584	AMY	THOMAS
1585	MONROE	THOMAS
1586	SCOTT	THOMPSON
1587	DENISE	THOMPSON
1588	NIKIERRIA	THOMPSON
1589	JENNIFER	THOMPSON
1590	ARION	THORNTON
1591	BETTY	THORNTON
1592	MARYLYNN	THURMAN
1593	SHARYN	THURSTON
1594	CHARLOTTE	TIMMS
1595	DENEEN	TIPTON
1596	CAITLIN	TOBIN
1597	BRITTNEY	TODD
1598	ROCHELLE	TOLAR
1599	DEONE	TOLBERT
1600	JENINE	TOLEFREE
1601	SORAIDA	TORRES
1602	VICTOR	TORRES
1603	KEVIN	TORRES
1604	ROSA	TORRES
1605	MELISSA	TORRES
1606	JEANETTE	TOSTENSON
1607	EBONIE	TOWNSEND
1608	LADONNA	TOY
1609	SUSAN	TRAVER
1610	CHARLES	TRAYES

No.	First Name	Last Name
1611	LONDON	TREMBLE
1612	CAPRIL	TRIMBLE
1613	TALIAH	TRIPLETT
1614	RESHARD	TUCKER
1615	LISA	TUCKER
1616	LINDA	TURNER
1617	DEMETRICE	TURNER
1618	JOEL	TUSING
1619	JORDAN	TYLER
1620	CHELSEA	TYLER
1621	REBECCA	UBRY
1622	MIRNA	UGALDE-HERNÁNDEZ
1623	LLOYD	UPTAIN
1624	SANDRA	URIBE
1625	GLENN R	USHER
1626	BARBARA	UTLEY
1627	ROSELIA	VALENCIA
1628	VERÓNICA	VALENZUELA
1629	FRANCISCO	VALENZUELA
1630	RACHEL	VALLEJO
1631	CASSIE	VAN RYCKE
1632	BRENDA	VANCE
1633	JUSTIN	VARGAS
1634	LISETTE	VARGAS
1635	BRITTANY	VARGAS
1636	ANAELINSON	VARGAS
1637	LUIS	VARGAS MONTES
1638	BRIDGET	VASQUEZ
1639	ARACELI	VAZQUEZ
1640	DIANE	VELASQUEZ
1641	CASSANDRA	VELAZQUEZ
1642	CASSANDRA	VELAZQUEZ
1643	KARTHIK	VENKATESAN
1644	ADRIÁN	VILLA
1645	ARMANDO	VILLALOBOS
1646	NETTIE	VILLARRUBIA
1647	RAFAEL	VILLARRUEL
1648	GRISELDA	VILLARRUEL
1649	JOSE	VILLEGAS
1650	WILLIAM	VINCETT
1651	NICOLE	VIVIANS
1652	DONOVAN	VOSS
1653	BRUCE	WAGERS
1654	ANNETTE	WAGNER
1655	MACKENZIE	WAGONER
1656	JEREMY	WALCH

No.	First Name	Last Name
1657	TITIANA	WALKER
1658	KAKESIA	WALKER
1659	ANTHONY	WALKER
1660	JASMINE	WALKER
1661	GEORGINA	WALKER
1662	DERRICK	WALKER
1663	DAWNTIAIR	WALKER
1664	RONALD	WALLACE
1665	AMBROSIA	WALLACE
1666	RILEY	WALLACE
1667	SANDY	WALLER
1668	MYKIA	WALLS
1669	BIANCA	WALLS
1670	BRIANNA	WALTON
1671	NIKKI	WALTON
1672	HUI CHIN	WANG
1673	DEIDRA	WARE
1674	STEVEN	WARNER
1675	AMBER	WARREN
1676	JUDITH	WARREN
1677	LORI	WARREN
1678	SHAURICE	WARRIOR
1679	BRIDGETT	WASHINGTON
1680	KINYOUNA	WASHINGTON
1681	MEGAN	WASHINGTON
1682	LAMIA	WASHINGTON
1683	TINA	WASHINGTON-DAVIS
1684	SHARON	WATERS
1685	ERICA	WATKINS
1686	BRANDON	WATKINS
1687	JAQWON	WATKINS
1688	BROOKE	WATKINS
1689	KIMBERLY	WATSON
1690	KIM	WATSON
1691	NEKESIA	WATSON
1692	REMINGTON	WATSON
1693	BRANDON	WATSON
1694	TRAMAINE	WATSON
1695	MARY	WATTS
1696	TIMOTHY	WEBB
1697	DAVID	WEBB
1698	VICKI	WEBB
1699	MARGUERITE	WEIRICH
1700	ROBERT	WESSELHOFF
1701	JALYNN	WEST
1702	MATTHEW	WEST

No.	First Name	Last Name
1703	DENNIS	WESTLEY
1704	BRIAN	WHEELER
1705	SANDY	WHEELER
1706	DESMOND	WHITE
1707	MARJORIE	WHITE
1708	AVEON	WHITE
1709	DARNISHA	WHITE
1710	OMIKA	WHITE-KING
1711	DAMYUS	WHITELOW
1712	TRIFONE	WHITMER
1713	MATTHEW	WHITSTINE
1714	EDWINA	WIGGINS
1715	BRIAN	WILBUR
1716	SUSAN	WILCOX
1717	KATARZYNA	WILCZEWSKA
1718	RAY	WILDE
1719	CHANTEL	WILDER
1720	PATRICIA	WILDER
1721	JANTEEA	WILDER
1722	TRAVIS	WILDER
1723	ANN	WILLIAMS
1724	TYRONE	WILLIAMS
1725	ANGELA	WILLIAMS
1726	DAWN	WILLIAMS
1727	CARLISSA	WILLIAMS
1728	VICTORIA	WILLIAMS
1729	TUNYA	WILLIAMS
1730	BRIANNA	WILLIAMS
1731	STEPHON	WILLIAMS
1732	LAKEYA	WILLIAMS
1733	MICHAEL	WILLIAMS
1734	RAVEN	WILLIAMS
1735	DERRELL	WILLIAMS
1736	RITA	WILLIAMS
1737	MARISSA	WILLIAMS
1738	DEREK	WILLIAMS
1739	SEAN	WILLIAMS
1740	TIMOTHY	WILLIAMS
1741	AZIZA	WILLIS
1742	DAMIEN	WILLIS
1743	CHRIS	WILLIS
1744	JENNIFER	WILLIS
1745	DEBBI	WILLOUGHBY
1746	ELLY	WILLS
1747	JESSICA	WILSON
1748	KENDREA	WILSON

No.	First Name	Last Name
1749	LUASHERN	WILSON
1750	CURLEANER	WILSON
1751	ALLEN	WILSON
1752	DARRYL	WILSON
1753	LATRICE	WILSON
1754	LASHEENA	WILSON
1755	TRACEY	WILSON
1756	ROBERT	WILSON
1757	TIARA	WINTERS
1758	DEBORAH	WIRTH
1759	CHRIS	WISNIEWSKI
1760	DONALD	WOFFORD
1761	SUSAN	WOLFE
1762	DENIESE	WOMACK
1763	IAN	WOOD
1764	BRIGETTE	WOODARD
1765	JUDITH ANN	WOODS
1766	VALINA	WOODS
1767	LORRIE	WOODY
1768	JORY	WOREK
1769	JUSTIN	WORKMAN
1770	MATTHEW	WRIGHT
1771	BARBARA	WRIGHT
1772	VALENCIA	WRIGHT
1773	TERESA	WYMAN
1774	DEMETRIUS	WYNNE
1775	SUSAN	YANEK
1776	MARK	YANEK
1777	RICHARD	YANIS
1778	CYNTHIA	YAP
1779	DEVONTE	YATES
1780	ROBERT	YATES
1781	DEVONTE	YATES
1782	SHARON	YEATES
1783	ROTEM	YOSSEF
1784	FUCK	YOU
1785	DARLISEA	YOUNG
1786	LATASHA	YOUNG
1787	LANDON	YOUNG
1788	ROSS	YOUNG
1789	GABRIELLE	YOUNG
1790	JERE	YOUNGER
1791	JASMINE	ZAMBRANO
1792	RICHARD	ZAMUDIO
1793	ADAM	ZIEGLER
1794	CHRISTOPHER	ZILLIGEN

No.	First Name	Last Name
1795	JESSICA	ZOBEL
1796	ZACH	ZUKOWSKI
1797	HASTIN	ZYLSTRA

Exhibit 2

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

Case No. 5:12-MD-2314-EJD

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

**[PROPOSED] ORDER GRANTING FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT PURSUANT TO FEDERAL
RULE OF CIVIL PROCEDURE 23(e)(2);
AWARDING ATTORNEYS' FEES,
EXPENSES, and NAMED PLAINTIFF
SERVICE AWARDS; AND ENTERING
FINAL JUDGMENT**

Judge: Hon. Edward J. Davila
Courtroom 4, 5th Floor
Hearing Date: March 31, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

1 **WHEREAS**, the Court held a Final Fairness Hearing on October 27, 2022, to consider
 2 approval of this class action Settlement. The Court has considered the Settlement Agreement (ECF
 3 233-1, Ex. 1), the record in the MDL action, and the Parties' arguments and authorities.

4 **GOOD CAUSE APPEARING, IT IS HEREBY ORDERED AS FOLLOWS:**

5 1. All terms and definitions used herein have the same meanings as set forth in the
 6 Settlement Agreement unless stated otherwise herein or in the Court's Order Granting Preliminary
 7 Approval of the Settlement.

8 2. The Court has jurisdiction over the subject matter of the MDL Action; Plaintiffs
 9 Perrin Davis, Dr. Brian Lentz, Michael Vickery, and Cynthia Quinn (the "MDL Plaintiffs"), the
 10 Settlement Class Members, and Defendant Meta Platforms, Inc., formerly Facebook, Inc. ("Meta"
 11 or "Defendant") (collectively "Parties").

12 3. The Court finds that the Notice Plan constituted the best notice practicable under the
 13 circumstances to all Settlement Class Members and fully complied with the requirements of Federal
 14 Rule of Civil Procedure 23 and due process.

15 4. The Court finds that, for purposes of the Settlement only, all prerequisites for
 16 maintenance of a class action set forth in Federal Rules of Civil Procedure 23(a) and (b)(3) are
 17 satisfied.

18 5. The Court certifies the following Settlement Class for purposes of Settlement only:

19 All persons who, between April 22, 2010 and September 26,
 20 2011, inclusive, were Facebook Users in the United States
 21 that visited non-Facebook websites that displayed the
 22 Facebook Like button.

23 The Settlement Class excludes Meta and any and all of its current and former predecessors,
 24 successors, assigns, parents, subsidiaries, affiliates, directors, officers, employees, agents,
 25 representatives, and attorneys, and any and all of the parents', subsidiaries', and affiliates' current
 26 and former predecessors, successors, assigns, directors, officers, employees, agents,
 27 representatives, and attorneys. The Settlement Class also excludes counsel for any Party in any of
 28 the Actions and any judicial officer presiding over the Actions, or any member of his or her

1 immediate family or of his or her judicial staff. The Settlement Class also excludes members who
 2 timely exercised their right to exclude themselves pursuant to the procedures described in the
 3 Notice and/or in Section 8 of the Settlement Agreement. The Settlement Class also excludes the
 4 Settlement Administrator and any and all of its predecessors, successors, assigns, parents,
 5 subsidiaries, affiliates, directors, officers, employees, agents, representatives, and attorneys, and
 6 any and all of the parents', subsidiaries', and affiliates' present and former predecessors,
 7 successors, assigns, directors, officers, employees, agents, representatives, and attorneys. The
 8 Settlement Class also excludes Settlement Class Counsel, counsel for any plaintiff in any
 9 consolidated or related action listed in Exhibit A to the Settlement Agreement, and any and all of
 10 their predecessors, successors, assigns, parents, subsidiaries, affiliates, directors, officers,
 11 employees, agents, representatives, and attorneys.

12 6. Pursuant to Federal Rule of Civil Procedure 23(e), the Court hereby grants final
 13 approval of the Settlement and finds that the Settlement is fair, reasonable, and adequate and in the
 14 best interests of the Settlement Class Members based on the following factors, among other things:

15 a. There is no fraud or collusion underlying this Settlement, and it was reached
 16 as a result of extensive arm's-length negotiations by counsel highly
 17 experienced in such cases and extremely conversant with the strengths and
 18 weaknesses of their respective cases, occurring over the course of several
 19 months and several mediation sessions with a respected mediator,. *See, e.g.,*
 20 *Officers for Justice v. Civil Serv. Comm'n*, 688 F.2d 615, 625 (9th Cir. 1982);
 21 *In re Bluetooth Headset Prods. Liab. Litig.*, 654 F.3d 935, 948 (9th Cir.
 22 2011) (presence of a neutral mediator is a factor weighing in favor of a
 23 finding of non-collusiveness). Despite the mediator's presence, the Court
 24 has performed its own, independent analysis of the Settlement's fairness,
 25 reasonableness, and adequacy pursuant to Federal Rule of Civil Procedure
 26 23(e)(2). *See Briseño v. Henderson*, 908 F.3d 1014, 1021 (9th Cir. 2021).

27 b. The complexity, expense, and likely duration of the litigation favor
 28 settlement—which provides meaningful benefits on a shorter time frame

than otherwise possible—on behalf of the Settlement Class Members. *See, e.g., Lane v. Facebook, Inc.*, 696 F.3d 811, 820 (9th Cir. 2012) (affirming the district court’s approval of a settlement where class counsel “reasonably concluded that the immediate benefits represented by the Settlement outweighed the possibility—perhaps remote—of obtaining a better result at trial”); *Class Plaintiffs v. City of Seattle*, 955 F.2d 1268, 1276 (9th Cir. 1992) (the Ninth Circuit has a “strong judicial policy that favors settlements, particularly where complex class action litigation is concerned”). Based on the stage of the proceedings and the substantial amount of investigation and discovery completed, the Parties have developed a sufficient factual record to evaluate their chances of success at trial and the proposed Settlement.

- c. The support of Settlement Class Counsel and the Named Plaintiffs, who have participated in this litigation and evaluated the proposed Settlement, also favor final approval. *See Class Plaintiffs*, 955 F.2d at 1294; *Boyd v. Bechtel Corp.*, 485 F. Supp. 610, 622 (N.D. Cal. 1979).
- d. The Settlement provides meaningful relief to the Settlement Class, including cash relief, and falls within the range of reasonable possible recoveries by the Settlement Class Members.

7. As of the Effective Date, the Releasing Parties, on behalf of themselves and their heirs, executors, administrators and assigns, and any person(s) they represent, shall be deemed by this Settlement to, and shall, release, dismiss, and finally and forever discharge the Released Claims, and will not in any manner pursue the Actions or any claims that were asserted or could have been asserted in the Actions; and shall be deemed by this Settlement to, and shall be forever barred from asserting, instituting, prosecuting, or maintaining against the Released Parties, any and all Released Claims. It is the intention of the Parties that any liability of the Released Parties relating to the Released Claims be eliminated. Accordingly, the Settlement shall terminate the MDL Action. Notwithstanding the foregoing, the release shall not include any claims relating to the continued enforcement of the Settlement or the Stipulated Protective Orders, including but not limited to ECF

1 Nos. 75, 169, and 227.

2 8. The Court finds that an award of attorneys' fees and expenses is appropriate
3 pursuant to Federal Rule of Civil Procedure 23(e)(2)(C)(iii) and therefore approves such award in
4 an amount, manner and timing as set forth in the Court's separate Order on Lead Counsel's
5 Application for a Fee and Expense Award and Service Awards.

6 9. Lead Counsel shall distribute the awarded attorneys' fees and expenses among
7 Settlement Class Counsel and Non-Class Counsel identified in the Settlement Agreement and shall
8 determine in their sole discretion based on each attorney's contributions to the prosecution and
9 settlement of these Actions. No other counsel will be entitled to an independent award of attorneys'
10 fees or expenses.

11 10. The Court finds that the payment of MDL Plaintiffs' and State Court Plaintiffs'
12 Service Awards is fair and reasonable and therefore approves such payment as set forth in the
13 Court's separate Order on Lead Counsel's Application for a Fee and Expense Award and Service
14 Awards.

15 11. The MDL Action, including all actions consolidated into the MDL Action and all
16 claims asserted in the actions, is settled and dismissed on the merits with prejudice.

17 12. Consummation of the Settlement shall proceed as described in the Settlement
18 Agreement, and the Court reserves jurisdiction over the subject matter and each Party to the
19 Settlement with respect to the interpretation and implementation of the Settlement for all purposes,
20 including enforcement of any of the terms thereof at the instance of any Party and resolution of any
21 disputes that may arise relating to the implementation of the Settlement or this Order.

22 13. Without affecting the finality of this Order in any way, the Court shall retain
23 jurisdiction over this Action, the MDL Plaintiffs, the Settlement Class Members, and Defendant to
24 enforce the terms of the Settlement, the Court's order directing notice (ECF 241) and this Order. In
25 the event that any applications for relief are made, such applications shall be made to the Court. To
26 avoid doubt, the Final Judgment applies to and is binding upon the Parties, the Settlement Class
27 Members, and their respective heirs, successors, and assigns.

28 14. The Settlement and this Order are not admissions of liability or fault by Defendant

1 or the Released Parties, or a finding of the validity of any claims in the Actions or of any
2 wrongdoing or violation of law by Defendant or the Released Parties. To the extent permitted by
3 law, neither this Order, nor any of its terms or provisions, nor any of the negotiations or proceedings
4 connected with it, shall be offered as evidence or received in evidence in any pending or future
5 civil, criminal, or administrative action or proceeding to establish any liability of, or admission by,
6 the Released Parties.

7 15. Notwithstanding the foregoing, nothing in this Order shall be interpreted to prohibit
8 the use of this Order in a proceeding to consummate or enforce the Settlement or this Order, or to
9 defend against the assertion of released claims in any other proceeding, or as otherwise required by
10 law.

11
12 IT IS SO ORDERED.

13
14 Dated: _____

Hon. Edward J. Davila
United State District Judge

Exhibit 3

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

[PROPOSED] JUDGMENT

THIS DOCUMENT RELATES TO
ALL ACTIONS

On _____, the Court signed and entered its Order Granting Final Approval of Class Action Settlement and its Order on Lead Counsel’s Motion for a Fee and Expense Award and Service Awards (ECF Nos. ____) (the “Final Approval Order” and the “Order on a Fee and Expense Award and Service Awards”) in the above-captioned matter as to the following class of persons:

All persons who, between April 22, 2010 and September 26, 2011, inclusive, were Facebook Users in the United States that visited non-Facebook websites that displayed the Facebook Like button.

JUDGMENT IS HEREBY ENTERED, pursuant to Federal Rule of Civil Procedure 58, as to the specified class of persons (excluding the individuals who validly and timely requested exclusion from the Settlement Class, as identified in the Final Approval Order), Plaintiffs Perrin Davis, Dr. Brian Lentz, Cynthia Quinn, and Matthew Vickery (the “MDL Plaintiffs”), and Defendant on the

terms and conditions of the Settlement Agreement approved by the Court's Final Approval Order.

1. For purposes of this Order, the Court adopts the terms and definitions set forth in the Settlement Agreement unless otherwise defined in the Preliminary Approval Order or Final Approval Order.

2. Payments to Settlement Class Members under the Settlement Agreement shall be made as outlined in the Final Approval Order and Settlement Agreement.

3. As of the Effective Date, the Releasing Parties, on behalf of themselves and their heirs, executors, administrators and assigns, and any person(s) they represent, shall be deemed by this Settlement to, and shall, release, dismiss, and finally and forever discharge the Released Claims, and will not in any manner pursue the Actions or any claims that were asserted or could have been asserted in the Actions; and shall be deemed by this Settlement to, and shall be forever barred from asserting, instituting, prosecuting, or maintaining against the Released Parties, any and all Released Claims. It is the intention of the Parties that any liability of the Released Parties relating to the Released Claims be eliminated. Accordingly, the Settlement shall terminate the MDL Action. Notwithstanding the foregoing, the release shall not include any claims relating to the continued enforcement of the Settlement or the Stipulated Protective Orders, including but not limited to ECF Nos. 75, 169, and 227.

4. The MDL Action, including all actions consolidated into the MDL Action and all claims asserted in the actions, is settled and dismissed on the merits with prejudice.¹

JUDGMENT APPROVED AS TO FORM:

Hon Edward J. Davila
United States District Court

JUDGMENT ENTERED: _____, 2022

By: CLERK OF THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

¹ Pursuant to the terms of the Settlement Agreement, as of the Effective Date, the State Court Action's named plaintiffs agreed to dismiss their State Court Action entirely on the merits with prejudice.

Exhibit 4

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**DECLARATION OF JASON “JAY” BARNES
IN SUPPORT OF PLAINTIFFS’ NOTICE OF
MOTION AND MOTION FOR
ATTORNEYS’ FEES, EXPENSES, AND
SERVICE AWARDS**

Judge: Hon. Edward J. Davila
Courtroom: 4—5th Floor
Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

I, **Jason “Jay” Barnes**, declare and state as follows:

INTRODUCTION

1. I, Jason “Jay” Barnes, am a member of the bar(s) of the State of Missouri.
2. I am a shareholder in the law firm of Simmons Hanly Conroy (“SHC”).
3. I have been appointed as Chair of the Plaintiffs’ Counsel Executive Committee and, with my co-counsel David A. Straite and Stephen G. Grygiel, to work as Class Counsel and to represent the Settlement Class. [ECF No. 241, ¶ 4]
4. I have personal knowledge of the facts stated below and of the various proceedings, in this Court, in the Ninth Circuit Court of Appeals, and in the United States Supreme Court, in this case.

ROLE IN THE CASE

5. Prior to the Court’s Order on April 3, 2012 consolidating the various previously filed cases

and appointing interim class counsel [ECF No. 19](the “Consolidation Order”), I worked to identify, research, and file claims on behalf of Plaintiffs in this action.

6. After the entry of the Consolidation Order, I worked on the case as requested and directed by the lead counsel. In particular I worked on framing discovery and discovery responses, reviewed documents produced by the Defendant, reviewed the briefing on the three dismissal motions and worked with my co-counsel, Messrs. Straite and Grygiel, in helping them to prepare for oral arguments in the case and to argue dispositive motions before the District Court; I also worked intensively on the appeal brief to the Ninth Circuit and on the brief Plaintiffs filed, with the assistance of Gupta Wessler, in opposing the Defendants’ petition for a writ of certiorari to the United States Supreme Court. I was involved in numerous settlement and settlement strategy discussions with Messrs. Straite and Grygiel, and also with the members of the settlement committee (Mr. King, Ms. Wicklund (on behalf of the State Court Counsel), Ms. Bronster, Mr. Hatch). I participated in all three mediation sessions that ultimately produced the agreement in principle to settle, as well as in the ensuing discussions about the scope and nature of injunctive relief, the notice program and selection of a Notice and Claims Administrator, and the transfer of information from Defendant to the Notice and Claims Administrator for purposes of facilitating notice. I assisted in the briefing for the Preliminary Settlement Approval, attended the Preliminary Settlement Approval Hearing, and have been involved in the briefing and settlement documentation required for Final Settlement Approval.

REVIEW OF TIME AND EXPENSE RECORDS

7. I have reviewed the time and expense records of Simmons Hanly Conroy, LLC, of which I am currently a shareholder, and Barnes & Associates, my firm at the beginning of this

litigation (“T&E Records”).

8. Because this case has been underway for over ten years, reviewing early T&E records for accuracy and completeness is more challenging than it might be in some other cases. However, I have reviewed the T&E Records of SHC (all of which reflect much more recent activity) and of Barnes & Associates (which was the entity through which my early work on the case was done). To the best of my knowledge and belief, all T&E Records submitted with this motion are accurate.
9. The chart below summarizes my firms’ T&E Records, showing two (2) different compilations: (i) total recorded time; (ii) total recorded time less *all* pre-MDL Consolidation time.

Firm	Total Time	Total Time Less <i>All</i> Pre-Consolidation Time	Total Expenses
Barnes & Associates	710.5 hours \$769,860.00	583.7 hours \$641,230.00	\$16,172.63
Simmons Hanly Conroy	328.9 hours \$331,257.50	328.9 hours \$331,257.50	\$16,653.92

10. I analyzed the T&E Records in seeking to ensure that inefficiencies and duplications were identified and removed, as well as to segregate pre- and post-Consolidation time. To the best of my knowledge and belief, I have removed all inefficiencies and duplications.
11. I reviewed the expenses listed above and affirm that they were all reasonably and necessarily incurred in the investigation, litigation and resolution of this case, and are reported at the actual incurred cost, with no “mark-up.”
12. The billing rates reflected in the T&E Report, which range from \$750.00 - \$1,100.00 per hour at Barnes & Associates and \$875.00 - \$1,100.00 per hour at Simmons Hanly Conroy,

are the billing rates we used at the relevant times for fully contingent cases like this one. I believe those rates are fair and reasonable in light of the qualifications, experience and competence of the lawyers. I also understand that they comport with rates approved in this District for lawyers of similar qualifications and experience in cases like this one.

13. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 23rd day of August 2022 in Oakland, California.

Dated: August 23, 2022

Respectfully submitted,

INSERT SIGNATURE BLOCK

/s/ Jay Barnes
Simmons Hanly Conroy LLC
112 Madison Avenue, 7th Floor
New York, NY 10016
Tel: (212) 784-6400
Fax: (212) 213-5949
jaybarnes@simmonsfirm.com

Exhibit 5

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**DECLARATION OF MARGERY S.
BRONSTER IN SUPPORT OF PLAINTIFFS'
NOTICE OF MOTION AND MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS**

Judge: Hon. Edward J. Davila
Courtroom: 4—5th Floor
Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

I, **Margery S. Bronster**, declare and state as follows:

INTRODUCTION

1. I, Margery S. Bronster, am a member of the bar of the States of Hawaii and New York.
2. I am a partner in the Honolulu-based law firm of Bronster Fujichaku Robbins.
3. The Court originally appointed me in this case as a member of the “special advisory committee consisting of former state attorneys’ general. [ECF No. 19, p. 2]
4. Subsequently the Court appointed me as Chair of the A[ttorneys] G[eneral]/Settlement Advisory Committee in this case. [ECF No. 241, ¶ 6]
5. I have personal knowledge of the facts stated below and of the various proceedings, in this Court, in the Ninth Circuit Court of Appeals, and in the United States Supreme Court, in this case.

ROLE IN THE CASE

6. Prior to the Court's Order on April 3, 2012 consolidating the various previously filed cases and appointing interim class counsel [ECF No. 19] (the "Consolidation Order"), I consulted with Cynthia Quinn who would later become a lead plaintiff in this matter. I researched, drafted and filed a class action complaint on her behalf in the District Court for the District of Hawaii and worked in support of consolidation of her action with other similar actions pending in other United States District Courts.
7. After the entry of the Consolidation Order, I worked on the case as requested and directed by the lead counsel. In particular, but only by example, I was centrally involved in the preparations for, and conduct of, the three mediation sessions with Randy Wulff that ultimately led to the Mediator's Proposal that was the basis for the settlement we reached. I reviewed and edited the two mediation briefs, participated in calls with my co-counsel in preparation for the mediation sessions and participated in all three of the mediation sessions, which constituted a total of some 21 hours over three separate sessions.

REVIEW OF TIME AND EXPENSE RECORDS

8. I have reviewed the time and expense records of Bronster Fujichaku Robbins ("T&E Records"). I believe those records are accurate.
9. The chart below summarizes my firm's T&E Records, divided into two (2) different segments: (i) total recorded time; (ii) total recorded time less *all* pre-MDL Consolidation time.

Firm	Total Time	Total Time Less <i>All</i> Pre-Consolidation Time	Total Expenses
Bronster Fujichaku Robbins	535.5 hours \$414,618.00	446.6 hours \$346,446.50	\$8,175.91

10. I analyzed the T&E Records in seeking to ensure that inefficiencies and duplications were identified and removed, as well as to segregate pre- and post-Consolidation time. Given the age of the case, and the sometimes-abbreviated descriptions of some work, I cannot state to a certainty that I identified and removed every entry that might have reflected inefficiency or redundancy. However, I do believe that any unidentified inefficiencies and duplications are immaterial.
11. I reviewed the expenses listed above and affirm that they were all reasonably and necessarily incurred in the investigation, litigation and resolution of this case, and are reported at the actual cost incurred, with no “mark-up.”
12. The billing rates reflected in the T&E Report, which range from \$175.00 - \$850.00 per hour, are the billing rates we used at the relevant times for fully contingent cases like this one. Based on the competence, experience and qualifications of the lawyers, I believe those rates are fair and reasonable. I also understand that these rates are consistent with rates approved in this District for lawyers of similar qualifications, competence and experience in large consumer privacy cases like this one, as well as other consumer class action cases.
13. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 23rd day of August 2022 in Honolulu, Hawaii.

Dated: August 23, 2022

Respectfully submitted,

INSERT SIGNATURE BLOCK

/s/Margery S. Bronster

Exhibit 6

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**DECLARATION OF WILLIAM H. MURPHY
IN SUPPORT OF PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS**

Judge: Hon. Edward J. Davila
Courtroom: 4—5th Floor
Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

I, **William H. “Billy” Murphy, Jr.**, declare and state as follows:

INTRODUCTION

1. I am a member of the bar of the State of Maryland since December 1969 and have been admitted to practice in the Fourth and Sixth Circuits. I have been admitted pro hac vice in numerous state and federal trial courts.
2. I am the senior partner in the Baltimore law firm of Murphy, Falcon and Murphy.
3. I was originally appointed to the “steering committee” of counsel in this case [ECF No. 19, at p. 2], then was appointed as a member of the Plaintiffs’ Counsel Executive Committee. [ECF No. 241, ¶ 5]. I was also appointed to lead the team’s expert witness committee.
4. I have personal knowledge of the facts stated below.

ROLE IN THE CASE

5. Prior to the Court's Order on April 3, 2012 consolidating the various previously filed cases and appointing interim class counsel [ECF No. 19] (the "Consolidation Order"), I worked on the Laura Maguire v. Facebook Class Action Complaint in the numerous ways described in my time records. I began working with David Straite on the complaint on February 15, 2012 and continued to refine the complaint until joining the Plaintiffs' Steering Committee on March 16, 2012. These refinements of the complaint were ultimately included in the First Amended Consolidated Class Action complaint we filed with the court on April 3, 2012.
6. After the entry of the Court's April 3, 2012 Consolidation Order [ECF No. 19], I worked on the case as requested and directed by the lead counsel. In particular, I worked as the head of the Expert Witness Committee and worked closely with potential experts and the experts we ultimately selected. I worked closely with others to integrate our expert opinions, as they evolved, into the First Amended Complaint, the Answer to Facebook's Motion to Dismiss, and the oral arguments. More precise information is detailed in my time records.

REVIEW OF TIME AND EXPENSE RECORDS

7. Unlike the pyramid structure of large firms with numerous associates, I had only two associates at the time I filed the pre-consolidation complaint against Facebook [Laura Maguire v. Facebook filed February 23, 2012.] Moreover, because I was an electrical engineer with a computer science background (B.S. in Electrical Engineering, (MIT 1965), and had worked briefly in the aerospace industry, I had kept up, regularly and passionately, with the major developments in the computer and internet world, and regularly read a variety of computer science publications. I therefore had a much better

and broader grasp of what Facebook, Google, Apple, Microsoft, etc. were doing with software, hardware and the internet than the lawyers in my firm. Because I spent the first 30 years of my practice as a criminal defense lawyer (except for 3 years as a trial judge), I was familiar with all of the constitutional issues in this case, including the federal and local wiretap statutes, the Fourth Amendment jurisprudence, etc. because I charged flat fees, I did not keep contemporaneous time during my practice and subsequently resisted all efforts to do so during the class action defense work I started doing in the early 2000's, for which I also charged flat fees.

8. For this reason, my associate Tonya Bana kept all time records in this case (until she left the firm in January, 2014) in software we stopped using years ago (Time Matters) and can no longer access. I have therefore reconstructed my time based on the numerous emails and documents exchanged between me, my associates Tonya Bana and Kambon Williams, and my fellow Facebook team members, including their time records. I also read a number of documents that were not exchanged. I no longer have phone, travel, and hotel records during this period and therefore have not included these expenses.
9. As the Court is well aware, this litigation has been extremely long-lived. It involved three motions to dismiss the three successive complaints, an appeal to the Ninth Circuit, and a petition by the Defendant for a writ of certiorari to the United States Supreme Court. After the Supreme Court did not grant certiorari, the case went to settlement negotiations and mediation. Accordingly, most of my work was done rather a long time ago, making accuracy somewhat more difficult than it might have been otherwise. However, I have thoroughly reviewed the records described above upon which my firm's time is based and believe that they are accurate.

10. The chart below summarizes my firm's records, showing two (2) different compilations: (i) total recorded time; (ii) total recorded time less *all* pre-MDL Consolidation time.

Firm	Total Time	Total Time Less <i>All</i> Pre- Consolidation Time	Total Expenses
Murphy, Falcon and Murphy	879.85 hours \$819,985.00	565.15 \$551,875.00	\$40,000.00

11. I analyzed our records in seeking to ensure that inefficiencies and duplications were identified and removed, as well as to segregate pre- and post-Consolidation time. Given the age of the case, and the sometimes-abbreviated descriptions of some work, I cannot unequivocally claim that I identified and removed every individual time entry that might have reflected inefficiency or redundancy. However, I believe that any unidentified inefficiencies and duplications that might remain in the submitted records are immaterial.
12. I reviewed the expenses listed above and affirm that they were all reasonably and necessarily incurred in the investigation, litigation and resolution of this case, and are reported at the actual incurred cost, with no "mark-up."
13. The billing rates reflected my submission, which range from \$300.00 - \$1,200.00 per hour, are the billing rates we used at the relevant times. I believe those rates are fair and reasonable in light of the qualifications, experience and competence of the lawyers. I also understand that they comport with rates approved in this District for lawyers of similar qualifications and experience in cases like this one.
14. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 23rd day of August 2022 in Baltimore, Maryland.

Dated: August 23, 2022

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Billy Murphy, Jr.', with a stylized flourish at the end.

William H. "Billy" Murphy, Jr., Esq.
1 South Street Suite 2300
Baltimore MD 21202
410-539-6500 main
410-951-8813 desk
410-493-6500 cell
billy12341@mac.com
billy.murphy@murphyfalcon.com
www.murphyfalcon.com

Exhibit 7

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**DECLARATION OF BARRY EICHEN IN
SUPPORT OF PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS**

Judge: Hon. Edward J. Davila
Courtroom: 4—5th Floor
Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

I, **BARRY EICHEN**, declare and state as follows:

INTRODUCTION

1. I, Barry Eichen, am a member of the bar of the State of New Jersey.
2. I am a founder and partner in the law firm of Eichen Crutchlow Zaslow, LLP.
3. I have been appointed as a member of the Plaintiffs' Executive Committee in this case.
[ECF No. 241, ¶ 5].
4. I have personal knowledge of the facts stated below and of the various proceedings, in this Court, in the Ninth Circuit Court of Appeals, and in the United States Supreme Court, in this case.

ROLE IN THE CASE

5. Prior to the Court's Order on April 3, 2012 consolidating the various previously filed cases and appointing interim class counsel [ECF No. 19](the "Consolidation Order"), I

worked with co-counsel, in particular David Straite, Billy Murphy, and Stephen Grygiel in researching and drafting an initial complaint, identifying and consulting with technology and privacy experts, discussing anticipated discovery and generally developing the case.

6. The Consolidation Order [ECF No. 19] appointed me to what was then the Plaintiffs' Steering Committee.
7. After the entry of the Consolidation Order, I worked on the case as requested and directed by the lead counsel. In particular my work focused on expert witness matters. I worked with my co-counsel, Billy Murphy, in identifying and meeting with potential technology and privacy experts, reviewing certain of their writings, and consulting with lead counsel about potential additional privacy claims that expert witness testimony would support.

8. REVIEW OF TIME AND EXPENSE RECORDS

9. I have reviewed the time and expense records of Eichen Crutchlow Zaslow, LLP ("T&E Records").
10. Given this case's long history, it is difficult to review early T&E records, especially of other lawyers in my firm, and state with absolute certainty that the time entries correspond perfectly to the work described. However, I have reviewed my firm's T&E Records and believe that they are accurate.
11. The chart below summarizes my firm's T&E Records, showing two (2) different compilations: (i) total recorded time; (ii) total recorded time less *all* pre-MDL Consolidation time.

Firm	Total Time	Total Time Less <i>All</i> Pre- Consolidation Time	Total Expenses

Eichen Crutchlow Zaslow, LLP	1,383.02 hrs.	757.85 hrs.	\$18,491.50
	\$849,928.33	\$467,550.00	

12. I analyzed the T&E Records in seeking to ensure that inefficiencies and duplications were identified and removed, as well as to segregate pre- and post-Consolidation time. Given the age of the case, and the sometimes-truncated narrative descriptions of some work, I cannot be certain that I found and deleted every single time entry that might have reflected inefficiency or redundancy. However, my goal was to do just that, and I believe that any unidentified inefficiencies and duplications are immaterial.
13. I reviewed the expenses listed above and affirm that they were all reasonably and necessarily incurred in the investigation, litigation and resolution of this case, and are reported at the actual incurred cost, with no “mark-up.”
14. The billing rates reflected in the T&E Report, which range from \$350 - \$750 per hour, are the billing rates we used at the relevant times for fully contingent cases like this one. I believe those rates are fair and reasonable in light of the qualifications, experience and competence of the lawyers. I also understand that they comport with rates approved in this District for lawyers of similar qualifications and experience in cases like this one..
15. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 23rd day of August 2022 in Edison Township, County of Middlesex, State of New Jersey.

Dated: August 23, 2022

Respectfully submitted,



Exhibit 8

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**DECLARATION OF PAUL R. KIESEL IN
SUPPORT OF PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS**

Judge: Hon. Edward J. Davila
Courtroom: 4—5th Floor
Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

I, **Paul R. Kiesel**, declare and state as follows:

INTRODUCTION

1. I, Paul R. Kiesel, am a member of the bar(s) of the State(s) of California and New York, as well as the District of Columbia.
2. I am a founder and partner in the law firm of Kiesel Law LLP.
3. I was initially appointed as Liaison Counsel in this case. [ECF No. 19 at p. 4].
4. In the Court's March 31, 2022 Order certifying a class for settlement purposes, preliminarily approving the settlement and approving the form and content of class notice, the Court appointed me as a member of the Plaintiffs' Counsel Executive Committee. [ECF No. 241, ¶ 5].
5. I have personal knowledge of the facts stated below and of the various proceedings, in this Court, in the Ninth Circuit Court of Appeals, and in the United States Supreme

Court, in this case.

ROLE IN THE CASE

6. Prior to the Court's Order on April 3, 2012, consolidating the various previously filed cases and appointing interim class counsel [ECF No. 19] (the "Consolidation Order"), I researched and reviewed the Complaint, served as local counsel, reviewed various Motions to Relate and the Court's Orders regarding the same, assisted in the preparation for the MDL hearing, drafted the Motion for Consolidation and Appointment of Interim Class Counsel, reviewed the initial case management conference statement, and prepared for and attended the initial case management conference.
7. After the entry of the Consolidation Order, I worked on the case as requested and directed by the lead counsel. In particular, my firm and I ensured that filings were timely made and in compliance with the local rules of this District. My firm also reviewed and filed the First Amended Complaint, participated in various strategy discussions, researched issues relating to privacy litigation, prepared for and attended status conferences, reviewed briefing on motions to dismiss, and reviewed and responded to written discovery.

REVIEW OF TIME AND EXPENSE RECORDS

8. I have reviewed the time and expense records of Kiesel Law LLP ("T&E Records"). I believe that those T&E Records are accurate.
9. The chart below summarizes my firm's T&E Records, showing two (2) different compilations: (i) total recorded time; (ii) total recorded time less *all* pre-MDL Consolidation time.

Firm	Total Time	Total Time Less <i>All</i> Pre-Consolidation Time	Total Expenses
Kiesel Law LLP	257.61 hours \$210,620.00	210.26 hours \$163,943.50	\$4,426.45

10. I analyzed the T&E Records in trying to make sure that inefficiencies and duplications were identified and removed, as well as to confirm the separation of pre- and post-Consolidation time. Given the age of the case, and the sometimes not deeply detailed descriptions of some work, I cannot swear that I identified and removed every single time entry that might have reflected inefficiency or redundancy. However, I can attest that any unidentified inefficiencies and duplications that might remain are immaterial.
11. I reviewed the expenses listed above and affirm that they were all reasonably and necessarily incurred in the investigation, litigation and resolution of this case, and are reported at the actual incurred cost, with no “mark-up.”
12. The billing rates reflected in the T&E Report, which range from \$150.00 - \$1,400 per hour, are the billing rates we used at the relevant times for fully contingent cases like this one. Although my billing rate is currently \$1,400 per hour, I have reduced it to \$1,200 for purposes of this case, given the age of this case. I believe my firm’s billing rates are fair and reasonable in light of the qualifications, experience and competence of the lawyers. As a California lawyer, I also understand that the rates for my firm conform to rates approved in this District for lawyers of similar qualifications and experience in cases like this one. In particular, in *Mount v. Wells Fargo Bank, N.A.*, Los Angeles Superior Court, Case No. BC395959, my hourly rate of \$1,100 was approved and was discussed in a California Court of Appeal opinion, albeit unpublished (*Mount v. Wells Fargo Bank, N.A.*, 2016 Cal. App. Unpub. LEXIS 969 at *40 (“Here, there was sufficient

evidence to support the court's approval of the hourly rates" which included Paul Kiesel's hourly rate of \$1,100 per hour)). Also, this year, my rate of \$1,400 per hour was approved by the United States District Court, Central District of California, in the case *Risto v. Screen Actors Guild*, Case No. 2:18-cv-07241-CAS-PLA.

13. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 23rd day of August 2022 in Beverly Hills, California.

Dated: August 23, 2022

Respectfully submitted,

/s/ Paul R. Kiesel
Paul R. Kiesel

Exhibit 9

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**DECLARATION OF STEPHEN GORNY IN
SUPPORT OF PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS**

Judge: Hon. Edward J. Davila
Courtroom: 4—5th Floor
Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

I, **Stephen Gorny**, declare and state as follows:

INTRODUCTION

1. I, Stephen Gorny, am a member of the bar(s) of the State(s) of Missouri and Kansas.
2. I am a founder and partner in the law firm of Gorny Dandurand, LC, Kansas City, Missouri.
3. I was appointed as a member of the original Plaintiffs' Steering Committee in this case. [ECF No. 19, ¶ 3]. At that time I was a lawyer in the Bartimus, Robertson, Frickleton & Gorny, P.C. law firm.
4. I was re-appointed as a member of the Plaintiffs' Counsel Executive Committee in this case. [ECF No. 241, ¶ 5]. At that time, I was the founder of The Gorny Law Firm, LC, which is now known as Gorny Dandurand, LC.
5. I have personal knowledge of the facts stated below and of the various proceedings, in

this Court, in the Ninth Circuit Court of Appeals, and in the United States Supreme Court, in this case.

ROLE IN THE CASE

6. Prior to the Court's Order on April 3, 2012, consolidating the various previously filed cases and appointing interim class counsel [ECF No. 19](the "Consolidation Order"), I met extensively with other members of the Steering Committee in formulating the concept for this litigation. This included the development of the overall theories, research into the viability of the theories, and determining which potential counts were available to the plaintiffs.
7. I recruited one of the class plaintiffs, John Graham, from the state of Kansas. I vetted Mr. Graham, his background, and his Facebook usage. I determined that he would be an appropriate class representative.
8. I participated in the recruiting of the national team to pursue this litigation. Through contacts gained in other class cases and cases of national scope, I was acquainted with a number of the lawyers that we ultimately enlisted to assist with this litigation.
9. After the entry of the Consolidation Order, I worked on the case as requested and directed by the lead counsel. In particular, I worked with the team to develop a discovery strategy and discovery requests aimed at determining the nature and extent of Facebook's improper conduct. I repeatedly worked to edit pleadings and strategize with counsel in response to the numerous motions filed by Facebook. I traveled to California to participate in the Case Management Conference. I worked with counsel Jay Barnes in preparing for oral argument on various motions. To that end, I questioned Mr. Barnes to assist him in articulating plaintiffs' theories of the case.

REVIEW OF TIME AND EXPENSE RECORDS

10. I have reviewed the time and expense records of Gorny Dandurand, LC (“T&E Records”). I believe that those T&E Records are accurate.
11. The chart below summarizes my firm’s T&E Records. Because all of Gorny Dandurand, LC’s work was done after April 3, 2012 Consolidation Order, the chart shows only (i) total recorded time and (ii) total expenses.

Firm	Total Time	Total Time Less <i>All</i> Pre-Consolidation Time	Total Expenses
Gorny Dandurand, LC	9.5 hours \$5,700.00	9.5 hours \$5,700.00	\$0.00

12. The billing rates reflected in the T&E Report, which range from \$600/hour for Stephen Gorny; \$400/hour for Christopher Dandurand; and \$150/hour for paralegals. These are the billing rates we used at the relevant times for fully contingent cases like this one. I believe those rates are fair and reasonable in light of the qualifications, experience and competence of the lawyers. I also understand that they comport with rates approved in this District for lawyers of similar qualifications and experience in cases like this one.
13. The majority of the time that I spent on this case was with my prior firm. As a result, the time invested will be reflected in the iterations of the Bartimus Frickleton firm from Leawood, Kansas. I have reviewed those records and declare that my time entries are true and correct. They also reflect rates charged by lawyers of similar experience.
14. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 23rd day of August 2022 in Kansas City, Missouri.

Dated: August 23, 2022

Respectfully submitted,

BY: /s/ Stephen M. Gorny

STEPHEN M. GORNY MO #45417

CHRISTOPHER D. DANDURAND MO #63775

Gorny Dandurand, LC

The Gorny Law Building

4330 Belleview Avenue, Suite 200

Kansas City, MO 64111

(816) 756-5071 (telephone)

(816) 756-5067 (facsimile)

steve@gornylawfirm.com

chris@gornylawfirm.com

Exhibit 10

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**DECLARATION OF JAMES FRICKLETON
IN SUPPORT OF PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS**

Judge: Hon. Edward J. Davila
Courtroom: 4—5th Floor
Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

I, **James Frickleton**, declare and state as follows:

INTRODUCTION

1. I, **James Frickleton**, am a member of the bars of the States of Missouri and Kansas.
2. I am a shareholder and officer in the law firm of Bartimus Frickleton Robertson and Rader.
3. My firm, then known as Bartimus, Frickleton, Robertson & Gorny, was originally appointed by the Court as one of the two members of the Executive Committee representing the putative class members in this case. [ECF No. 19, at p. 2].
4. In the Court's March 31, 2022 Order Certifying Settlement Class; Granting Preliminary Approval of Class Action Settlement Pursuant to Fed. R. Civ. P. 23(e)(1); and Approving Form and Content of Class Notice, I was appointed as a member of the Plaintiffs' Counsel Executive Committee. [ECF No. 241, ¶ 5].

5. I have personal knowledge of the facts stated in this Declaration.

ROLE IN THE CASE

6. Prior to the Court's Order on April 3, 2012 consolidating the various previously filed cases and appointing interim class counsel [ECF No. 19](the "Consolidation Order"), I worked with various co-counsel, including, for example, Mr. Straite and Mr. Grygiel, as well as others, on a number of tasks. Just for example, this included analyzing and discussing the legal theories and claims alleged in the initially filed unconsolidated cases, discussing the factual elements and proofs required for what we anticipated would become a consolidated Complaint and discussing and agreeing upon a leadership structure for the case that would promote efficiency in the litigation while ensuring that all of the various skills of the lawyers involved would be brought to bear for the members of the putative class. In addition, I attended meetings of counsel for various plaintiffs, did factual and legal research regarding the defendant and the claims made in this case, worked of the Rule 23g motion and attended the initial status conference hearing in the case.
7. After the entry of the Consolidation Order, I worked on the case, including by conducting potential expert witness evaluations, drafting portions of and reviewing consolidated complaint, attending Case Management Conference, reviewing the defense Motion to Dismiss and participating in the response thereto, worked on ESI discovery issues, participate in Rule 26 conference, worked on initial discovery from Facebook and also plaintiff's discovery. Ultimately, as Messrs. Straite and Grygiel, with Jay Barnes, took on leadership roles, I worked as they requested and directed

REVIEW OF TIME AND EXPENSE RECORDS

8. I have reviewed the time and expense records of Bartimus Frickleton Robertson and Rader (“T&E Records”) and its predecessor incarnations. I believe those T&E Records are accurate. My firm keeps contemporaneous time records as a policy, so, although this case has been pending for many years, I have no reason to believe that any of the records are incorrect.
9. The chart below summarizes my firm’s T&E Records, showing two (2) different compilations: (i) total recorded time; (ii) total recorded time less *all* pre-MDL Consolidation time.

Firm	Total Time	Total Time Less All Pre-Consolidation Time	Total Expenses
Bartimus Frickleton Robertson and Rader	468.3 hours \$305,445.00	295.40 \$200,050.00	\$22,817.83

10. I analyzed the T&E Records in seeking to ensure that inefficiencies and duplications were identified and removed, as well as to segregate pre- and post-Consolidation time. Given the age of the case, and the sometimes-abbreviated descriptions of some work, I cannot be certain that I was able to find and delete every entry that might have reflected inefficiency or redundancy. However, I am confident that if there are any unidentified inefficiencies and duplications, they are immaterial.
11. I reviewed the expenses listed above and affirm that they were all reasonably and necessarily incurred in the investigation, litigation and resolution of this case, and are reported at the actual incurred cost, with no “mark-up.”
12. The billing rates reflected in the T&E Report, which range from \$400.00 - \$750.00 per hour, are the billing rates we used at the relevant times for fully contingent cases like this

one. I believe those rates are fair and reasonable in light of the qualifications, experience and competence of the lawyers. I also understand that they are consistent with, indeed are conservative in comparison to, rates approved in this District for lawyers of similar qualifications and experience in cases like this one.

13. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 23rd day of August 2022 in Leawood, KS

Dated: August 23, 2022

Respectfully submitted,

JAMES P. FRICKLETON

/s/ James P Frickleton

**BARTIMUS FRICKLETON
ROBERTSON RADER, P.C.
4000 W. 114th St, Suite 310
Leawood, Ks 66211
(913) 266-2300/ Fax (913) 266-2366
jimf@bflawfirm.com**

Exhibit 11

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**DECLARATION OF WILLIAM M.
CUNNINGHAM, JR. IN SUPPORT OF
PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR ATTORNEYS' FEES,
EXPENSES, AND SERVICE AWARDS**

Judge: Hon. Edward J. Davila
Courtroom: 4—5th Floor
Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

I, William M. Cunningham, Jr., declare and state as follows:

INTRODUCTION

1. I, William M. Cunningham, Jr. am an active member of the bar of the State of Alabama and an inactive member of the bar of the State of Mississippi.
2. I am a partner in the law firm of Burns, Cunningham & Mackey, P.C.
3. I was initially appointed as a member of the Plaintiffs' Counsel Steering Committee in this case. [ECF No. 19, page 2].
4. Subsequently, in connection with its order granting Preliminary Settlement Approval, the Court reappointed me to what was now called the Plaintiffs' Counsel Executive Committee. [ECF No. 241, ¶ 5].
5. I have personal knowledge of the facts stated below.

ROLE IN THE CASE

6. Prior to the Court's Order on April 3, 2012 consolidating the various previously filed cases and appointing interim class counsel [ECF No. 19](the "Consolidation Order"), I consulted with client, researched, drafted and filed complaint, received, researched and responded to motion to transfer, corresponded and discussed issues with defense counsel, corresponded and met with counsel on other filed cases, reviewed case filings and orders, prepared curriculum vitae, traveled to and from San Jose, California for hearing.
7. After the entry of the Consolidation Order, I worked on the case as requested and directed by the lead counsel. My firm researched and drafted portions of the Plaintiffs' objection to the motion to dismiss. I coordinated with co-counsel and staff setting up software to review discovery documents. While I reviewed documents, my primary responsibility was to supervise members of my firm who reviewed thousands of documents and made data entries for the data bank. I also reviewed the filings in the case, performed research, attended steering and executive committee conferences, and corresponded and coordinated with co-counsel throughout the litigation.
8. My firm also had the coordinated assistance of Elizabeth Thomas, Esq, who filed a Consolidated Case in Montana and monitored the litigation.

9. REVIEW OF TIME AND EXPENSE RECORDS

10. I have reviewed the time and expense records of Burns, Cunningham & Mackey, P.C ("T&E Records").
11. Because this case has gone on for over ten (10) years, reviewing the earlier time entries for accuracy and completeness is somewhat more difficult than it is to do so for the more recent time entries. However, I have my firm's T&E Records and believe that they are accurate.
12. The chart below summarizes my firm's T&E Records, showing two (2) different

compilations:(i) total recorded time; (ii) total recorded time less *all* pre-MDL Consolidation time.

Firm	Total Time	Total Time Less <i>All</i> Pre-Consolidation Time	Total Expenses
Burns, Cunningham & Mackey, P.C	318.7 hours \$125,057.50	271.1 hours \$105,137.50	\$2,773.89

13. I analyzed the T&E Records in seeking to ensure that inefficiencies and duplications were identified and removed, as well as to segregate pre- and post-Consolidation time. Given the age of the case, and the sometimes-abbreviated descriptions of some work, I cannot state that I identified and removed every single time entry that might have reflected inefficiency or redundancy, but I believe that any unidentified and unremoved inefficiencies and duplications are immaterial.
14. I reviewed the expenses listed above and affirm that they were all reasonably and necessarily incurred in the investigation, litigation and resolution of this case, and are reported at the same out-of-pocket cost my firm incurred in connection with them.
15. The billing rates reflected in the T&E Report, which range from \$200.00 - \$450.00 per hour, are the billing rates we used at the relevant times for fully contingent cases like this one. I believe those rates are not just fair and reasonable but probably understated in light of the qualifications, experience and competence of the lawyers. I also understand that they are fully consistent with, indeed modest by comparison to, rates that Courts in this District have approved for lawyers of similar qualifications and experience in cases like this one.
16. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 23rd day of August 2022 in Rossville, Georgia.

Dated: August 23, 2022

Respectfully submitted,

/s/ William M. Cunningham, Jr.
WILLIAM M. CUNNINGHAM, JR.

Exhibit 12

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**DECLARATION OF ANDREW S.
LYSKOWSKI IN SUPPORT OF
PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR ATTORNEYS' FEES,
EXPENSES, AND SERVICE AWARDS**

Judge: Hon. Edward J. Davila
Courtroom: 4—5th Floor
Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

I, **Andrew S. Lyskowski**, declare and state as follows:

INTRODUCTION

1. I, Andrew S. Lyskowski, am a member of the bar of the State of Missouri.
2. I am an Associate in the law firm of Bergmanis Law Firm, L.L.C.
3. On April 3, 2012, in its Order Granting Plaintiffs' Motion to Consolidate and Appoint Interim Class Counsel, the Court appointed me as a member of what was styled as the "steering committee." [ECF No. 19, at p. 2]
4. In its March 31, 2022 Order that certified a settlement class, granted preliminary settlement approval and approved the form and content of notice to the class, the Court appointed me as a member of the Plaintiffs' Counsel Executive Committee in this case. [ECF No. 241, ¶ 5].
5. I have personal knowledge of the facts stated below.

ROLE IN THE CASE

6. Prior to the Court's Order on April 3, 2012 consolidating the various previously filed cases and appointing interim class counsel [ECF No. 19] (the "Consolidation Order"), I undertook, along with others, drafting the petition for multiple states (Missouri, Kansas, Mississippi, Arizona) including the first petition filed from Missouri. This included assembling a team of attorneys nationwide with the help from other very experienced counsel I asked to take part in the case. I also procured a suitable plaintiff for our first case and sent the first spoliation/preservation of evidence letter to the Defendant. I personally attended the JPML hearing in Miami and the initial appearance before this court. Additionally, I volunteered to take co-lead on drafting the Wiretap Act section in our consolidated complaint and spent much time researching the nuances of the Wiretap Act and how various courts have interpreted its provisions.
7. After the entry of the Consolidation Order, I worked on the case as requested and directed by the lead counsel. In particular I spent hours reviewing documents produced during discovery and assessing their importance. I reviewed all filings in the case. Assisted in drafting portions of Plaintiffs' pleadings, attended numerous strategic conference calls, researched related issues outside of our discovery (various types of cookies functionality using the computer program Fiddler [a debugging program])

REVIEW OF TIME AND EXPENSE RECORDS

8. I have reviewed the time and expense records of the Bergmanis Law Firm ("T&E Records"). I believe, after that review, that they are accurate.
9. The chart below summarizes my firm's T&E Records, showing two (2) different compilations: (i) total recorded time; (ii) total recorded time less *all* pre-MDL

Consolidation time.

Firm	Total Time	Total Time Less <i>All</i> Pre-Consolidation Time	Total Expenses
Bergmanis Law Firm	184.2 hours \$92,100.00	74.4 hours \$37,200.00	\$4,390.67

10. I analyzed the T&E Records in seeking to ensure that inefficiencies and duplications were identified and removed, as well as to segregate pre- and post-Consolidation time. Given the age of the case, and the sometimes-abbreviated descriptions of some work, I cannot be completely certain that I identified and removed every entry that might have been for inefficient, redundant or otherwise non-compensable work. However, based on my review, I believe that any such unidentified inefficiencies and duplications are immaterial.
11. I reviewed the expenses listed above. I hereby affirm that they were all reasonably and necessarily incurred in the investigation, litigation and resolution of this case, and reflect the actual incurred cost, with no “mark-up.”
12. The billing rates reflected in the T&E Report, at \$500.00 per hour, are the billing rates we used for my work at the relevant times for fully contingent cases like this one. I believe those rates are fair and reasonable in light of the qualifications, experience and competence of the lawyers. I also understand that they comport with rates approved in this District for lawyers of similar qualifications and experience in cases like this one.
13. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 23rd day of August 2022 in Camden County, Missouri.

Dated: August 23, 2022

Respectfully submitted,

/s/ Andrew Lyskowski

Andrew S. Lyskowski, Mo. Bar #58307

Attorneys at Law

380 W. Hwy. 54, Ste. 201

P.O. Box 229

Camdenton, Missouri 65020

Phone: (573) 346-2111

Fax: (573) 346-5885

e-mail: alyskowski@ozarklawcenter.com

ATTORNEYS FOR PLAINTIFF

Exhibit 13

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**DECLARATION OF ERIC LANSVERK IN
SUPPORT OF PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS**

Judge: Hon. Edward J. Davila
Courtroom: 4—5th Floor
Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

I, **Eric Lansverk**, declare and state as follows:

INTRODUCTION

1. I, Eric Lansverk, am a member of the bars of the State of Washington and the State of Oregon.
2. I am an attorney in the law firm of Hillis Clark Martin & Peterson P.S. (“HCMP”).
3. A partner of HCMP was appointed as a member of the Plaintiffs’ Executive Committee in this case. [ECF No. 241, ¶ 5].
4. I have knowledge of the facts stated below and of the various proceedings, in this Court, in the Ninth Circuit Court of Appeals, and in the United States Supreme Court, in this case.

ROLE IN THE CASE

5. HCMP represented Matthew Vickery in all aspects of these related proceedings.

REVIEW OF TIME AND EXPENSE RECORDS

6. I have reviewed the time and expense records of HCMP. (“T&E Records”).

7. Given the lengthy duration of this case, it is difficult to review early T&E records, especially of other lawyers in my firm, and state with absolute certainty that the time entries correspond perfectly to the work described. However, I have reviewed my firm's T&E Records and believe that they are accurate.

8. The chart below summarizes my firm's T&E Records, showing two (2) different compilations: (i) total recorded time; (ii) total recorded time less *all* pre-MDL Consolidation time.

Firm	Total Time	Total Time Less <i>All</i> Pre-Consolidation Time	Total Expenses
Hillis Clark Martin & Peterson P.S.	120.1 hours = \$52,562.00	91 hours = \$40,194.50	\$1,311.37

9. I analyzed the T&E Records in seeking to ensure that inefficiencies and duplications were identified and removed, as well as to segregate pre- and post-Consolidation time. Given the age of the case, and the sometimes-abbreviated descriptions of some work, I cannot state that I identified and removed every single time entry that might have reflected inefficiency or redundancy. However, my goal was to do just that, and I believe that any unidentified inefficiencies and duplications are immaterial.

10. I reviewed the expenses listed above and affirm that they were all reasonably and necessarily incurred in the investigation, litigation and resolution of this case, and are reported at the actual incurred cost, with no "mark-up."

11. The billing rates reflected in the T&E Report are the billing rates we used at the relevant times for fully contingent cases like this one. I believe those rates are fair and reasonable in light of the qualifications, experience and competence of the lawyers. I also understand that they comport with rates approved in this District for lawyers of similar qualifications and experience in cases like this one.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 23rd day of August 2022 in Seattle, Washington.

Hillis Clark Martin & Peterson P.S.



Eric D. Lansverk
999 Third Avenue, Suite 4600
Seattle, WA 98104
206.623.1745
206.623.7789 (fax)
eric.lansverk@hcmp.com

Exhibit 14

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 12-md-02314 EJD
DECLARATION OF
KIM E. RICHMAN

Judge: Hon. Edward J. Davila
Courtroom 4, 5th Floor
Hearing Date: October 27, 2022
Time: 9:00 a.m.

I, Kim E. Richman, declare the following under penalty of perjury:

1. I am over eighteen (18) years of age.
2. I represent Plaintiffs Ryan Ung, Alice Rosen, and Chi Cheng in the matter of *Ung, et al. v. Facebook, Inc.*, No. 112-cv-217244 (Super. Ct. Cal. 2012) (the “State Matter”).
3. My current law firm, and its predecessor, have contributed 465.7 hours of attorney time and 3.5 hours of paralegal time on the State Matter and coordinating with counsel in the above-captioned matter, including in negotiating the Settlement Agreement reached in that matter, combining for a total amount of \$365,085 in fees and costs.
4. Each of my clients has consented to the Settlement Agreement in the above-captioned matter, preliminarily approved on March 31, 2022 (ECF No. 241).
5. Each of my clients has submitted a claims form to the claims administrator.
6. I request a service award of \$3,000 for each of my clients.

DECLARATION OF KIM E. RICHMAN

1 I declare under penalty of perjury of the laws of the United States that the forgoing is true
2 and correct.

3 Executed on August 22, 2022, in Irvington, NY.
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5 /s/Kim E. Richman
6 Kim E. Richman
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DECLARATION OF KIM E. RICHMAN

Exhibit 15

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**DECLARATION OF MATTHEW WESSLER
IN SUPPORT OF PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS**

Judge: Hon. Edward J. Davila
Courtroom: 4—5th Floor
Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

I, Matthew Wessler, declare and state as follows:

INTRODUCTION

1. I, Matthew Wessler, am a principal at the law firm of Gupta Wessler PLLC, a national appellate and complex-litigation boutique in Washington, D.C. I am a member of the Bars of the District of Columbia and Massachusetts and am admitted to the Bars of the U.S. Supreme Court as well as the U.S. Court of Appeals for the First, Second, Third, Fourth, Sixth, Seventh, Eighth, Ninth, Tenth, and D.C. Circuits.
2. Both my and my firm's practice is focused on Supreme Court, appellate, and complex litigation with an emphasis on class-action issues and consumer-protection law. My caseload consists primarily of handling appeals of consumer and worker-protection cases, including class actions, in federal appellate courts and the Supreme Court. I have argued before the U.S. Supreme Court on behalf of plaintiffs in a number of major consumer and

worker rights cases, including *Coventry Health Care v. Nevils*, 137 S. Ct. 1190 (2017), *U.S. Airways v. McCutchen*, 133 S. Ct. 1537 (2013), and *Heimeshoff v. Hartford Life Insurance*, 134 S. Ct. 604 (2013). Two terms ago I argued and won another plaintiffs'-side class-action case in the U.S. Supreme Court, *Intel Investment Policy Cmte. v. Sulyma*, 140 S. Ct. 768 (2020).

3. Within just the past several years, I have also argued and won significant class-action and consumer-protection appeals around the country. *See, e.g., Berman v. Freedom Financial Network, LLC*, 30 F.4th 849 (9th Cir. 2022); *Hengle v. Treppa*, 19 F. 4th 324 (4th Cir. 2021); *Williams v. Medley Opportunity Fund II, LP*, 965 F.3d 229 (3d Cir. 2020); *Gibbs v. Haynes Inv. LLC*, 965 F.3d 229 (4th Cir. July 21, 2020); *Gibbs v. Sequoia Capital Operations, LLC*, 966 F.3d 286 (4th Cir. 2020); *In re MDL Genentech Herceptin Marketing & Sale Practice Litig.*, 960 F.3d 1210 (10th Cir. 2020); *Molock v. Whole Foods Group, Inc.*, 952 F.3d 293 (D.C. Cir. 2020); *In re Lantus Direct Purchaser Antitrust Litig.*, 950 F.3d 1 (1st Cir. 2020); *Cullinane v. Uber Technologies, Inc.*, 893 F.3d 53 (1st Cir. 2018); *MacDonald v. CashCall, Inc.*, 883 F.3d 220 (3d Cir. 2018); *Roberts v. Capital One, N.A.*, 719 Fed. App'x. 33 (2d Cir. 2017); *Hayes v. Delbert Services Corp.*, 811 F.3d 666 (4th Cir. 2016). In all of these cases, I represented plaintiffs seeking to recover for injuries caused by illegal conduct committed by companies.
4. For my appellate work, I won the Pound Civil Justice Institute's 2020 Appellate Advocacy Award, which recognizes excellence in appellate advocacy in cases that have a significant impact on public health and safety, consumer rights, civil rights, environmental justice, access to justice. *See* <http://www.poundinstitute.org/appellate-advocacy-award/>. My firm was also named to the National Law Journal's Appellate Hot

List 2020 and 2021—the only plaintiffs’-side, consumer- and worker-rights firm to be recognized. *See, e.g.*, <https://www.law.com/nationallawjournal/2020/11/01/appellate-hot-list-2020-gupta-wessler/>.

5. My firm, Gupta Wessler, was chosen by the Co-Lead Counsel in this case, David Straite and Stephen Grygiel, and by Jay Barnes, the Chair of the Plaintiffs’ Counsel Executive Committee, after reviewing proposals from two other firms in addition to our firm’s proposal, to work with Messrs. Straite, Grygiel and Barnes on behalf of the putative class members in opposing the petition for a writ of certiorari to the United States Supreme Court that the Defendant filed after the Ninth Circuit’s ruling in this case.
6. Gupta Wessler executed a retainer agreement with Messrs. Straite, Grygiel and Barnes, on behalf of the putative class, describing the terms of our engagement, our role, and how Gupta Wessler would be compensated in the event the case was ultimately successful through litigation or settlement. Gupta Wessler, like the Co-Lead Counsel and Mr. Barnes, worked entirely on a contingency, with any compensation being entirely dependent on the success of the case through litigation or settlement.
7. I have personal knowledge of the facts stated below.

ROLE IN THE CASE

8. My firm spent a significant amount of time investigating, researching, and litigating the matters that are being resolved by the settlement. Along with my colleague Neil Sawhney, I reviewed the relevant pleadings, motions and memoranda of law, and court rulings in the case, analyzed the relevant case law and statutes implicated by the Defendant’s Cert Petition, consulted on numerous occasions with Messrs. Straite, Grygiel and Barnes, and ultimately drafted and filed a brief in opposition to the Defendant’s cert.

petition in the Supreme Court.

9. The brief in opposition argued, in short, that (i) no circuit split existed, making the case an improper vehicle for the Supreme Court to use to address the “party to the communication” exception to liability under the federal Wiretap Act, and (ii) the Ninth Circuit’s ruling on that issue was correct on the merits.
10. My firm worked closely with Messrs. Straite, Grygiel and Barnes in drafting and revising the Supreme Court Brief. The Supreme Court denied review of Defendant’s Cert Petition.

REVIEW OF TIME AND EXPENSE RECORDS

11. I have reviewed the time and expense records of Gupta Wessler for this engagement (“T&E Records”) and found that they were accurate.
12. Gupta Wessler’s role in the case was important, but it was limited in duration and finite in scope and in accordance with our retainer agreement, we kept contemporaneous and accurate time and expense records.
13. Gupta Wessler worked a total of 250.02 hours, generating a lodestar of \$186,610. This reflects a paralegal hourly rate of \$250, an associate hourly rate of \$500 and principal hourly rate of \$900. These are the standard rates we were then using for contingency cases of this type. I believe that they are fair and reasonable, and consistent with the prevailing fees in the Northern District of California for attorneys with our qualifications, experience and expertise.
14. My firm’s expenses were paid for by the firms of Messrs. Straite, Grygiel and Barnes.
15. I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on August 23, 2022

/s/ Matthew W.H. Wessler
Matthew W.H. Wessler

Exhibit 16

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

THIS DOCUMENT RELATES TO
ALL ACTIONS

Case No. 5:12-MD-2314-EJD

**DECLARATION OF SETTLEMENT CLASS
REPRESENTATIVE PERRIN DAVIS**

Judge: Hon. Edward J. Davila
Courtroom 4, 5th Floor
Hearing Date: October 27, 2022
Time: 9:00 a.m.

1. I am **Perrin Davis**, court-appointed Settlement Class Representative in the above-captioned Multidistrict Litigation. I am over the age of eighteen.
2. I am a citizen of, and reside in, the State of Illinois.
3. I make this Declaration in Support of the Plaintiffs' Motion and Memorandum of Law in Support of Final Settlement Approval, and in Support of the Plaintiffs' Motion and Memorandum of Law in Support of Award of Attorneys' Fees, Expenses, and Service Awards.

ROLE IN THE LITIGATION

4. I have been involved as a plaintiff in consolidated case *Davis, et al. v. Facebook, Inc.*, since it began; and in this MDL since my case was consolidated with it.
5. David Straite was personal attorney to me and my family prior to start of this litigation. In September 2011, when news broke of Facebook's post-logout tracking of subscribers' visits to Facebook partner websites, I spoke with David on a confidential basis about my rights and I asked to be a part of the litigation.
6. I understood that participating as a plaintiff in the case would involve a continuing commitment and at times would require meaningful amounts of my time and effort,

particularly because I understood the case was being brought as a class action. I knew that meant I would be representing a very large class of similarly situated persons who had experienced the same conduct while in the United States.

7. With David, I discussed and reviewed the initially-filed Complaint and understood, at a layperson's level, what the Complaint was alleging. David also advised that I had a duty to preserve relevant documents and I did so to the best of my ability.

8. When the initial case was consolidated with other cases by other plaintiffs alleging the same or similar facts and legal theories, I also agreed to serve, if approved by the Court, as a Named Plaintiff in the consolidated action. I also met several of David's co-counsel at a meeting in Chicago, whom I recall included Billy Murphy and Steve Grygiel, among others.

9. I understood that serving as a Named Plaintiff meant that I was serving as a representative of the proposed class of Facebook users that had been subjected to the conduct that we were alleging was improper. I accepted the responsibility of doing this work.

10. Specifically, I willingly undertook the job, among other things, of continually monitoring the status of the case, staying up to date on developments, communicating frequently with David, providing information to him, producing information about my web-browsing and Internet activities, producing personal emails to David that I understand were produced in discovery, reviewing, responding to, finalizing and signing interrogatories, and generally being available for whatever the case required of me.

11. When the case was on appeal, I watched the video of David arguing before the Ninth Circuit. I also read the opinion of the Ninth Circuit after it was issued.

12. When the case went to mediation, David asked that I be available in case I was needed. When the parties had a third mediation, David contacted me to discuss whether I'd approve the terms. I did. As discussed below, only after I said yes to the terms, did David inform me of the right that he and Steve Grygiel secured to seek a service award.

13. After mediation, David kept me informed of progress on negotiating the language of the settlement agreement. On February 14, 2022, I signed the agreement.

14. I agree wholeheartedly with the settlement agreement's key terms. I do not pretend to understand all of the technical legal language, but I was delighted that, after over a decade of litigation, the Defendant had agreed to both the data deletion and monetary components.

15. I continue to be a Facebook subscriber and I am glad Facebook has agreed to this settlement.

SERVICE AWARD DISCUSSION

16. As discussed above, it was only after I had discussed the settlement terms with David (and approved) that he informed me of the possibility that I might be eligible for a Service Award for the work I had done on the case for over ten years.

17. In no way was my agreement to the settlement conditioned on any Service Award to me. Again, I was not even aware of the possibility of any Service Award being awarded to me until after I had reviewed and given my approval to the settlement agreement's terms. I would enthusiastically support the settlement in any case, including if it did not provide for the potential of a Service Award to me.

18. I am aware that a Service Award of \$5,000 has been proposed for me. I believe that my work on the case and the assistance I gave the lawyers for this lengthy and complicated case, as well as my willingness to stand up for privacy rights, justifies such an Award should the Court see fit to approve it. I own my own small publishing business, and my net revenues per hour worked are many times higher than the per-hour rate implied by the \$5,000 Service Award.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 22nd day of August, 2022, at Deerfield, IL.

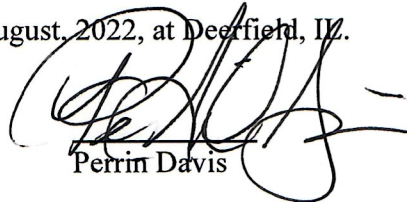

Perrin Davis

Exhibit 17

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**DECLARATION OF SETTLEMENT CLASS
REPRESENTATIVE Dr. BRIAN LENTZ**

Judge: Hon. Edward J. Davila
Courtroom 4, 5th Floor
Hearing Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

1. I am **Dr. Brian Lentz**, court-appointed Settlement Class Representative in the above-captioned Multidistrict Litigation. I am over the age of eighteen.
2. I am a citizen of, and reside in, the State of Virginia.
3. I make this Declaration in Support of the Plaintiffs' Motion and Memorandum of Law in Support of Final Settlement Approval, and in Support of the Plaintiffs' Motion and Memorandum of Law in Support of Award of Attorneys' Fees, Expenses, and Service Awards.

ROLE IN THE LITIGATION

4. I have been involved as a plaintiff in consolidated case *Davis, et al. v. Facebook, Inc.*, since it began; and in this MDL since my case was consolidated with it.
5. David Straite was personal attorney for me and my family prior to start of this litigation. For example, David advised me on legal matters before the birth of my children, and he also provided legal advice when I switched medical practices.
6. In September 2011, I saw news reporting that Facebook was tracking visits to other websites even after I logged out of my Facebook account. David and I conferred on a confidential basis and I asked to be a part of the litigation.

7. I understood that participating as a plaintiff in the case would involve a continuing commitment and at times would require meaningful amounts of my time and effort, particularly because I understood the case was being brought as a class action. I knew that meant I would be representing a very large class of similarly situated persons who had experienced the same conduct while in the United States.

8. With David, I discussed and reviewed the initially-filed Complaint and understood, at a layperson's level, what the Complaint was alleging. David also advised that I had a duty to preserve relevant documents and I did so to the best of my ability.

9. When the initial case was consolidated with other cases by other plaintiffs alleging the same or similar facts and legal theories, I also agreed to serve, if approved by the Court, as a Named Plaintiff in the consolidated action.

10. I understood that serving as a Named Plaintiff meant that I was serving as a representative of the proposed class of Facebook users that had been subjected to the conduct that we were alleging was improper. I accepted the responsibility of doing this work.

11. Specifically, I willingly undertook the job, among other things, of continually monitoring the status of the case, staying up to date on developments, communicating frequently with David, providing information to him, producing information about my web-browsing and Internet activities, reviewing personal emails and other documents for relevance, reviewing, responding to, finalizing and signing interrogatories, and generally being available for whatever the case required of me.

12. I also read the opinion of the Ninth Circuit after it was issued.

13. When the case went to mediation, David asked that I be available in case I was needed. When the parties had a third mediation, David contacted me to discuss whether I'd approve the terms. I did. As discussed below, only after I said yes to the terms, did David inform me of the right that he and Steve Grygiel secured to seek a service award up to \$5,000.

14. After mediation, David kept me informed of progress on negotiating the language of the settlement agreement. On February 14, 2022, I signed the agreement.

15. I support the settlement and I'm happy to see that, after over a decade of litigation, the Defendant had agreed to both the data deletion and monetary components. The data deletion portion is the part is the most important, in my view.

16. I continue to be a Facebook subscriber and I am glad Facebook has agreed to this settlement.

SERVICE AWARD DISCUSSION

17. As discussed above, it was only after I had discussed the settlement terms with David (and approved) that he informed me of the possibility that I might be eligible for a Service Award for the work I had done on the case for over ten years.

18. In no way was my agreement to the settlement conditioned on any Service Award to me. Again, I was not even aware of the possibility of any Service Award being awarded to me until after I had reviewed and given my approval to the settlement agreement's terms. I would still support the settlement in any case, especially the data deletion part, even if it did not provide for the potential of a Service Award to me.

19. I am aware that a Service Award of \$5,000 has been proposed for me. I believe that my work on the case and the assistance I gave the lawyers for this lengthy and complicated case, as well as my willingness to stand up for privacy rights, justifies such an Award should the Court see fit to approve it. I am a cardiologist, and my income per hour worked is higher than the per-hour rate implied by the \$5,000 Service Award, underscoring its reasonableness.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 22nd day of August, 2022, at Richmond, VA.


Dr. Brian Lentz

email authorization
given at 5:34 pm EDT
from Richmond, VA

Exhibit 18

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**DECLARATION OF SETTLEMENT CLASS
REPRESENTATIVE CYNTHIA QUINN**

Judge: Hon. Edward J. Davila
Courtroom 4, 5th Floor
Hearing Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

1. I am **Cynthia Quinn**, court-appointed Settlement Class Representative in the above-captioned Multidistrict Litigation. I am over the age of eighteen, a citizen of, and reside in, the State of Hawaii, and am an attorney licensed to practice law in the state of Hawaii.

2. I make this Declaration in Support of the Plaintiffs' Motion and Memorandum of Law in Support of Final Settlement Approval, and in Support of the Plaintiffs' Motion and Memorandum of Law in Support of Award of Attorneys' Fees, Expenses, and Service Awards.

ROLE IN THE LITIGATION

3. I have been involved as a plaintiff in the consolidated case *Davis, et al. v. Facebook, Inc.*, since it began; and in this MDL since my case was consolidated with it.

4. Margery Bronster has been a professional colleague and friend for well over twenty-five years -- long before the start of this litigation. Margery is the founder of a law firm in Honolulu known as Bronster Fujichaku Robbins. Robert Hatch is of counsel to Margery's firm.

5. In September 2011, when news broke of Facebook's post-logout tracking of subscribers' visits to Facebook partner websites, I spoke with Margery and Robert on a confidential basis about my rights, and I asked to be a part of the litigation.

6. I understood that participating as a plaintiff in the case would involve a continuing commitment and at times would require meaningful amounts of my time and effort, particularly because I understood the case was being brought as a class action. I knew that meant I would be representing a very large class of similarly-situated persons who had experienced the same conduct while in the United States.

7. With Margery and Robert, I discussed and reviewed the initially-filed Complaint and understood what the Complaint was alleging. They also advised that I had a duty to preserve relevant documents, and I did so to the best of my ability.

8. When the initial case was consolidated with other cases by other plaintiffs alleging the same or similar facts and legal theories, I also agreed to serve, if approved by the Court, as a Named Plaintiff in the consolidated action.

9. I understood that serving as a Named Plaintiff meant that I was serving as a representative of the proposed class of Facebook users that had been subjected to the conduct that we were alleging was improper. I accepted the responsibility of doing this work.

10. Specifically, I willingly undertook the job, among other things, of continually monitoring the status of the case, staying up to date on developments, communicating frequently with Margery and Robert, providing information to them, producing information about my web-browsing and Internet activities, producing personal emails that I understand were produced in discovery, reviewing, responding to, finalizing and signing interrogatories, and generally being available for whatever the case required of me.

11. When the case was on appeal, I followed its progress, reviewed the briefs, and the opinion issued by the Ninth Circuit.

12. When the case went to mediation, Robert asked that I be available in case I was needed. When the parties had a third mediation, Robert contacted me to discuss whether I, as a Settlement Class Representative approved of the consideration proposed for the class. I did. As discussed below, only after I agreed to these terms, did Margery and Robert inform me that the proposed settlement also included Facebook's agreement to allow the possibility of a service award

for Settlement Class Representatives such as myself.

13. After mediation, Robert kept me informed of the progress on negotiating the precise language of the Settlement Agreement. On February 14, 2022, I signed the agreement.

14. I agree wholeheartedly with the settlement agreement's key terms. I was delighted that, after over a decade of litigation, the Defendant had agreed to both the data deletion and monetary components.

SERVICE AWARD DISCUSSION

15. As discussed above, it was only after I had agreed to the settlement terms for the class, that Margery and Robert informed me that the settlement also included Defendant's agreement to allow me to be eligible for a Service Award for efforts I had made as a Named Plaintiff on this case for over ten years.

16. My agreement to the settlement was not conditioned on any Service Award to me. I was not even aware that the agreed terms included the possibility of a Service Award to me until after I had reviewed and otherwise given my approval to the settlement's consideration to the class. I would enthusiastically support the settlement even if it did not provide for the potential of a Service Award to me.

17. I understand that a Service Award of \$5,000 has been proposed for me. I believe that my work on the case and the assistance I gave for this lengthy and complicated case, as well as my willingness to stand up for privacy rights, justifies such an Award should the Court see fit to approve it. I am a licensed attorney and my hourly rate is many times higher than the per-hour rate implied by the \$5,000 Service Award.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 23d day of August, 2022, at Honolulu, Hawaii.


Cynthia Quinn

Exhibit 19

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

THIS DOCUMENT RELATES TO
ALL ACTIONS

Case No. 5:12-MD-2314-EJD

**DECLARATION OF SETTLEMENT CLASS
REPRESENTATIVE MATTHEW VICKERY**

Judge: Hon. Edward J. Davila
Courtroom 4, 5th Floor
Hearing Date: October 27, 2022
Time: 9:00 a.m.

1. I am **Matthew Vickery**, court-appointed Settlement Class Representative in the above-captioned Multidistrict Litigation. I am over the age of eighteen.

2. I am a citizen of, and reside in, the State of Washington.

3. I make this Declaration in Support of the Plaintiffs' Motion and Memorandum of Law in Support of Final Settlement Approval, and in Support of the Plaintiffs' Motion and Memorandum of Law in Support of Award of Attorneys' Fees, Expenses, and Service Awards.

ROLE IN THE LITIGATION

4. I have been involved as a plaintiff in consolidated case *Davis, et al. v. Facebook, Inc.*, since it began; and in this MDL since my case was consolidated with it.

5. Mike Scott at Hillis Clark Martin and Peterson ("HCMP") was personal attorney to me and my family prior to start of this litigation. In September 2011, when news broke of Facebook's post-logout tracking of subscribers' visits to Facebook partner websites, I spoke with HCMP on a confidential basis about my rights and I asked to be a part of the litigation.

6. I understood that participating as a plaintiff in the case would involve a continuing commitment and at times would require meaningful amounts of my time and effort,

particularly because I understood the case was being brought as a class action. I knew that meant I would be representing a very large class of similarly situated persons who had experienced the same conduct while in the United States.

7. With HCMP, I discussed and reviewed the initially-filed Complaint and understood, at a layperson's level, what the Complaint was alleging. HCMP also advised that I had a duty to preserve relevant documents and I did so to the best of my ability.

8. When the initial case was consolidated with other cases by other plaintiffs alleging the same or similar facts and legal theories, I also agreed to serve, if approved by the Court, as a Named Plaintiff in the consolidated action.

9. I understood that serving as a Named Plaintiff meant that I was serving as a representative of the proposed class of Facebook users that had been subjected to the conduct that we were alleging was improper. I accepted the responsibility of doing this work.

10. Specifically, I willingly undertook the job, among other things, of continually monitoring the status of the case, staying up to date on developments, communicating frequently with HCMP, providing information to HCMP, producing information about my web-browsing and Internet activities, producing personal emails to HCMP that I understand were produced in discovery, reviewing, responding to, finalizing and signing interrogatories, and generally being available for whatever the case required of me.

11. When the case was on appeal, I watched the video of David Straite arguing before the Ninth Circuit. I also read the opinion of the Ninth Circuit after it was issued.

12. When the case went to mediation, HCMP asked that I be available in case I was needed. When the parties had a third mediation, HCMP contacted me to discuss whether I'd approve the terms. I did. As discussed below, only after I said yes to the terms, did HCMP inform me of the right that counsel secured to seek a service award.

13. After mediation, HCMP kept me informed of progress on negotiating the language of the settlement agreement. On February 14, 2022, I signed the agreement.

14. I approve of the settlement agreement's key terms. I do not pretend to understand

all the technical legal language, but I am gratified that, after over a decade of litigation, the Defendant has agreed to both the data deletion and monetary components.

15. I continue to be a Facebook subscriber and I am glad Facebook has agreed to this settlement.

SERVICE AWARD DISCUSSION

16. As discussed above, it was only after I had discussed the settlement terms with HCMP (and approved) that HCMP informed me of the possibility that I might be eligible for a Service Award for the work I had done on the case for over ten years.

17. In no way was my agreement to the settlement conditioned on any Service Award to me. Again, I was not even aware of the possibility of any Service Award being awarded to me until after I had reviewed and given my approval to the settlement agreement's terms. I would wholeheartedly support the settlement in any case, including if it did not provide for the potential of a Service Award to me.

18. I am aware that a Service Award of \$5,000 has been proposed for me. I believe that my work on the case and the assistance I gave the lawyers for this lengthy and complicated case, as well as my willingness to stand up for privacy rights, justifies such an Award should the Court see fit to approve it.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 23 day of August, 2022, at Lakewood, Washington.

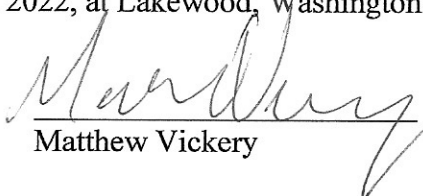

Matthew Vickery

Exhibit 20

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 12-md-02314 EJD
DECLARATION OF RYAN UNG

Judge: Hon. Edward J. Davila
Courtroom 4, 5th Floor
Hearing Date: October 27, 2022
Time: 9:00 a.m.

I, Ryan Ung, declare the following under penalty of perjury:

1. I am over eighteen (18) years of age and a resident of California.
2. I am a named Plaintiff in the matter of *Ung, et al. v. Facebook, Inc.*, No. 112-cv-217244 (Super. Ct. Cal. 2012) (the “State Matter”).
3. I make this Declaration in Support of the Multidistrict Litigation (“MDL”) Plaintiffs’ Motion and Memorandum of Law in Support of Final Settlement Approval, and in Support of the Plaintiffs’ Motion and Memorandum of Law in Support of Award of Attorneys’ Fees, Expenses, and Service Awards.

ROLE IN LITIGATION

4. I have been involved in this litigation since the State Matter, which was stayed because of the MDL, was filed in 2012
5. I am a Facebook member who visited websites that display the Facebook “Like” button, including anime44.com and crunchyroll.com. Facebook used the “Like” button to track and collect my browsing history and link it to personally identifiable information without my consent using Facebook’s “datr tracking cookie,” which was found on my computer.

DECLARATION OF RYAN UNG

1 6. I was not aware that Facebook was collecting my personal information and
2 browsing history and, had I been aware, I would not have consented to this. If given the choice, I
3 would have utilized a username as opposed to my real name in connection with my Facebook
4 account.

5
6 7. I understood that participating as a Plaintiff in the State Matter would involve a
7 continuing commitment and at times would require meaningful amounts of my time and effort,
8 particularly because I understood the case was being brought as a class action. I knew that meant
9 I would be representing a very large class of similarly situated persons who had experienced the
10 same conduct while in the United States.

11
12 8. With my Counsel, Milberg Coleman Bryson Phillips Grossman, PLLC and
13 Richman Law & Policy, I discussed and reviewed the initially filed Complaint and understood, at
14 a layperson's level, what the Complaint was alleging. I was also advised that I had a duty to
15 preserve relevant documents and I did so to the best of my ability.

16
17 9. I do not believe I have interests that are inconsistent with the interests of the Class
18 Members I seek to represent, and I believe that I will adequately represent those class members.

19 10. As a Settlement Class Representative, I have always considered the interests of
20 Class Members just as I would consider my own interests, and where appropriate, I have
21 understood that I must put the interests of Class Members before my own interests.

22
23 11. I have participated in and will continue to participate actively in the lawsuit as
24 necessary and help in any way I can, including consenting to a stay of the State Matter, so that the
25 MDL could be resolved.

26 12. I recognize and accept that the Settlement Agreement is subject to Court approval
27 and must be designed in the best interest of the Class as a whole.

28
DECLARATION OF RYAN UNG

1 13. I agree wholeheartedly with the settlement agreement's key terms. I do not pretend
2 to understand all of the technical legal language, but I was delighted that, after over a decade of
3 litigation, the Defendant had agreed to both the data deletion and monetary components.
4

5 14. I submitted my claims form on July 16, 2022.

6 15. I understand that the costs and attorneys' fees associated with this lawsuit are paid
7 out of the recovery.

8 **SERVICE AWARD DISCUSSION**

9 16. As discussed above, it was only after I had discussed the settlement terms with my
10 Counsel (and approved) that I was informed of the possibility that I might be eligible for a Service
11 Award for the work I had done on the case for over ten years.
12

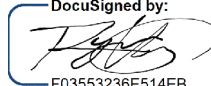
13 17. In no way was my agreement to the settlement conditioned on any Service Award
14 to me. Again, I was not even aware of the possibility of any Service Award being awarded to me
15 until after I had reviewed and given my approval to the settlement agreement's terms. I would
16 enthusiastically support the settlement in any case, including if it did not provide for the potential
17 of a Service Award to me.
18

19 18. I am aware that a Service Award of \$3,000 has been proposed for me. I believe that
20 my work on the case and the assistance I gave the lawyers for this lengthy and complicated case,
21 as well as my willingness to stand up for privacy rights, justifies such an Award should the Court
22 see fit to approve it.
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DECLARATION OF RYAN UNG

1 I declare under penalty of perjury of the laws of the United States that the forgoing is true
2 and correct.

3 Executed on August 22, 2022, in San Francisco, CA.

DocuSigned by:

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Ryan Ung

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DECLARATION OF RYAN UNG

Exhibit 21

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 12-md-02314 EJD
DECLARATION OF CHI CHENG

Judge: Hon. Edward J. Davila
Courtroom 4, 5th Floor
Hearing Date: October 27, 2022
Time: 9:00 a.m.

I, Chi Cheng, declare the following under penalty of perjury:

1. I am over eighteen (18) years of age and a resident of California.
2. I am a named Plaintiff in the matter of *Ung, et al. v. Facebook, Inc.*, No. 112-cv-217244 (Super. Ct. Cal. 2012) (the “State Matter”).
3. I make this Declaration in Support of the Multidistrict Litigation (“MDL”) Plaintiffs’ Motion and Memorandum of Law in Support of Final Settlement Approval, and in Support of the Plaintiffs’ Motion and Memorandum of Law in Support of Award of Attorneys’ Fees, Expenses, and Service Awards.

ROLE IN LITIGATION

4. I have been involved in this litigation since the State Matter, which was stayed because of the MDL, was filed in 2012
5. I am a non-Facebook member who visited a website in the Facebook Connect network and subsequently visited a website displaying the Facebook “Like” button. Facebook used the Like Button and Facebook Connect to collect my browsing history and personally

DECLARATION OF CHI CHENG

1 identifiable information without my consent using Facebook's "datr tracking cookie," which was
2 found on my computer.

3 6. I was not aware that Facebook was collecting my personal information and
4 browsing history and, had I been aware, I would not have consented to this.

5 7. I understood that participating as a Plaintiff in the State Matter would involve a
6 continuing commitment and at times would require meaningful amounts of my time and effort,
7 particularly because I understood the case was being brought as a class action. I knew that meant
8 I would be representing a very large class of similarly situated persons who had experienced the
9 same conduct while in the United States.

10 8. With my Counsel, Milberg Coleman Bryson Phillips Grossman, PLLC and
11 Richman Law & Policy, I discussed and reviewed the initially filed Complaint and understood, at
12 a layperson's level, what the Complaint was alleging. I was also advised that I had a duty to
13 preserve relevant documents and I did so to the best of my ability.

14 9. I do not believe I have interests that are inconsistent with the interests of the Class
15 Members I seek to represent, and I believe that I will adequately represent those class members.

16 10. As a Settlement Class Representative, I have always considered the interests of
17 Class Members just as I would consider my own interests, and where appropriate, I have
18 understood that I must put the interests of Class Members before my own interests.

19 11. I have participated in and will continue to participate actively in the lawsuit as
20 necessary and help in any way I can, including consenting to a stay of the State Matter, so that the
21 MDL could be resolved.

22 12. I recognize and accept that the Settlement Agreement is subject to Court approval
23 and must be designed in the best interest of the Class as a whole.

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DECLARATION OF CHI CHENG

1 13. I agree wholeheartedly with the settlement agreement's key terms. I do not pretend
2 to understand all of the technical legal language, but I was delighted that, after over a decade of
3 litigation, the Defendant had agreed to both the data deletion and monetary components.
4

5 14. I submitted my claims form on July 15, 2022.

6 15. I understand that the costs and attorneys' fees associated with this lawsuit are paid
7 out of the recovery.

8 **SERVICE AWARD DISCUSSION**

9 16. As discussed above, it was only after I had discussed the settlement terms with my
10 Counsel (and approved) that I was informed of the possibility that I might be eligible for a Service
11 Award for the work I had done on the case for over ten years.
12

13 17. In no way was my agreement to the settlement conditioned on any Service Award
14 to me. Again, I was not even aware of the possibility of any Service Award being awarded to me
15 until after I had reviewed and given my approval to the settlement agreement's terms. I would
16 enthusiastically support the settlement in any case, including if it did not provide for the potential
17 of a Service Award to me.
18

19 18. I am aware that a Service Award of \$3,000 has been proposed for me. I believe
20 that my work on the case and the assistance I gave the lawyers for this lengthy and complicated
21 case, as well as my willingness to stand up for privacy rights, justifies such an Award should the
22 Court see fit to approve it.
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DECLARATION OF CHI CHENG

1 I declare under penalty of perjury of the laws of the United States that the forgoing is true
2 and correct.

3 Executed on August 22, 2022, in Tracy, CA.

DocuSigned by:

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Chi Cheng

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DECLARATION OF CHI CHENG

Exhibit 22

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 12-md-02314 EJD
DECLARATION OF ALICE ROSEN

Judge: Hon. Edward J. Davila
Courtroom 4, 5th Floor
Hearing Date: October 27, 2022
Time: 9:00 a.m.

I, Alice Rosen, declare the following under penalty of perjury:

1. I am over eighteen (18) years of age and a resident of California.
2. I am a named Plaintiff in the matter of *Ung, et al. v. Facebook, Inc.*, No. 112-cv-217244 (Super. Ct. Cal. 2012) (the “State Matter”).
3. I make this Declaration in Support of the Multidistrict Litigation (“MDL”) Plaintiffs’ Motion and Memorandum of Law in Support of Final Settlement Approval, and in Support of the Plaintiffs’ Motion and Memorandum of Law in Support of Award of Attorneys’ Fees, Expenses, and Service Awards.

ROLE IN LITIGATION

4. I have been involved in this litigation since the State Matter, which was stayed because of the MDL, was filed in 2012
5. I am a non-Facebook member who visited websites in the Facebook Connect network, including HSN.com, MSN.com, QVC.com, and ABC.com, and subsequently visited websites displaying the Facebook “Like” button or Facebook Connect, including HSN.com, MSN.com, QVC.com, and ABC.com.

DECLARATION OF ALICE ROSEN

1 6. Facebook used the Like Button and Facebook Connect to collect my browsing
2 history and personally identifiable information without my consent using Facebook's "data
3 tracking cookie," which was found on my computer.

4
5 7. I was not aware that Facebook was collecting my personal information and
6 browsing history and, had I been aware, I would not have consented to this.

7 8. I understood that participating as a Plaintiff in the State Matter would involve a
8 continuing commitment and at times would require meaningful amounts of my time and effort,
9 particularly because I understood the case was being brought as a class action. I knew that meant
10 I would be representing a very large class of similarly situated persons who had experienced the
11 same conduct while in the United States.

12
13 9. With my Counsel, Milberg Coleman Bryson Phillips Grossman, PLLC and
14 Richman Law & Policy, I discussed and reviewed the initially filed Complaint and understood, at
15 a layperson's level, what the Complaint was alleging. I was also advised that I had a duty to
16 preserve relevant documents and I did so to the best of my ability.

17
18 10. I do not believe I have interests that are inconsistent with the interests of the Class
19 Members I seek to represent, and I believe that I will adequately represent those class members.

20 11. As a Settlement Class Representative, I have always considered the interests of
21 Class Members just as I would consider my own interests, and where appropriate, I have
22 understood that I must put the interests of Class Members before my own interests.

23
24 12. I have participated in and will continue to participate actively in the lawsuit as
25 necessary and help in any way I can, including consenting to a stay of the State Matter, so that the
26 MDL could be resolved.

27
28 DECLARATION OF ALICE ROSEN

1 13. I recognize and accept that the Settlement Agreement is subject to Court approval
2 and must be designed in the best interest of the Class as a whole.

3 14. I agree wholeheartedly with the settlement agreement's key terms. I do not pretend
4 to understand all of the technical legal language, but I was delighted that, after over a decade of
5 litigation, the Defendant had agreed to both the data deletion and monetary components.
6

7 15. I submitted my claims form on July 19, 2022.

8 16. I understand that the costs and attorneys' fees associated with this lawsuit are by
9 paid out of the recovery.
10

11 **SERVICE AWARD DISCUSSION**

12 17. As discussed above, it was only after I had discussed the settlement terms with my
13 Counsel (and approved) that I was informed of the possibility that I might be eligible for a Service
14 Award for the work I had done on the case for over ten years.

15 18. In no way was my agreement to the settlement conditioned on any Service Award
16 to me. Again, I was not even aware of the possibility of any Service Award being awarded to me
17 until after I had reviewed and given my approval to the settlement agreement's terms. I would
18 enthusiastically support the settlement in any case, including if it did not provide for the potential
19 of a Service Award to me.
20

21 19. I am aware that a Service Award of \$3,000 has been proposed for me. I believe that
22 my work on the case and the assistance I gave the lawyers for this lengthy and complicated case,
23 as well as my willingness to stand up for privacy rights, justifies such an Award should the Court
24 see fit to approve it.
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DECLARATION OF ALICE ROSEN

1 I declare under penalty of perjury of the laws of the United States that the forgoing is true
2 and correct.

3 Executed on August 22, 2022, in Sunnyvale, CA.

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DECLARATION OF ALICE ROSEN

Exhibit 23

August 22, 2022
Volume XII, Number 234

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THE NATIONAL LAW REVIEW

0 NEW ARTICLES

Facebook to Pay \$90 Million to Settle Data Privacy Lawsuit

Article By

Cynthia J. Larose
Natalie A. Prescott

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Friday, February 18, 2022

Facebook's parent company Meta has agreed to settle one of the longest-running data privacy lawsuits in the country for \$90 million. This dispute, originally filed in 2012 in a total of 21 related cases, alleged that Facebook continued to track its users even after they logged out of the social media platform. Specifically, the plaintiffs' alleged that Facebook used cookies and various plug-ins in order to track and save information about its users' visits to third-party websites and then sold to advertisers.

This multidistrict ("MDL") litigation, pending in California—a state where a large portion of nationwide privacy class action suits tends to end up—is styled *In re: Facebook Internet Tracking Litigation*, U.S. District Court, Northern District of California, No. 12-md-02314. The operative complaint alleges that Facebook violated federal and state privacy laws, as well as wiretapping laws, by tracking users whenever they visited unaffiliated websites containing Facebook "like" buttons. According to the complaint, Facebook unlawfully compiled users' data, including browsing histories, in order to sell their user profiles to third parties for purposes of targeted advertising.

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plaintiffs could prove privacy violations, after all, citing Facebook's unlawful profits stemming from the alleged practices, and finding that the plaintiffs sufficiently alleged concrete and particularized harm. The Ninth Circuit further ruled that the fact that Facebook actually profited from the sale of users' data created "economic harm" for purposes of standing. The Ninth Circuit also rejected Facebook's argument that it was a party to communications between its users and other websites for purposes of wiretapping laws. The U.S. Supreme Court subsequently declined to take the case, and the consolidated actions were therefore sent back down to the trial court, at which point settlement negotiations ensued.

This week's settlement **agreement** covers a narrow time period—only those Facebook users who visited third-party websites in the United States between April 22, 2010 and September 26, 2011 are eligible to submit a claim. Yet, this settlement is significant and groundbreaking with respect to its reach, the amount, and the injunctive relief secured for the plaintiffs. In addition to the monetary component, Facebook will also have to delete all of the user data that it had allegedly collected unlawfully—a significant potential precedent for future settlements in a court system that has not previously focused on data deletion in privacy cases. The proposed settlement further requires Facebook to establish a \$90-million fully non-revisionary settlement fund, which reportedly represents disgorgement of 100% or more of Facebook's profits in connection with this unlawfully obtained data.

If this settlement is approved, it will become one of the largest and noteworthy data privacy class action settlements in the United States. The proposed settlement will resolve not only the underlying federal action but also a related state-court lawsuit against Facebook.

While Meta described the settlement as a business-driven decision, if approved, it will avoid a costly trial and the possibility of a staggering verdict, in the wake of other privacy complaints against Facebook. Facebook and Meta have faced other privacy-related issues, which resulted in a 2019 settlement with the FTC with a \$5 billion fine and a February 15, 2022 lawsuit by Texas Attorney General against Facebook's parent company, Meta, alleging that it collected facial recognition data and captured users' biometric information from photos and videos without their consent. And, as we **reported** previously, privacy implications of the Facebook whistleblower testimony before Congress highlighted other potential harms, such as valuing profit over the safety of users and alleging the targeting of children through the Instagram platform.

This settlement serves as a cautionary tale for companies that collect or track user data or use other forms of browser tracking. Such companies ensure that their privacy programs keep pace with compliance with all relevant laws. Since privacy laws are ever-changing, it is equally as important to keep abreast of new legal developments and carefully monitor compliance issues. New laws in California, Virginia, and Colorado will be effective in 2023 and planning for compliance with those laws should be underway. Additionally, regulators such as the **Federal Trade Commission** and the **Securities and Exchange Commission** have indicated that they will be turning attention to privacy and cybersecurity issues in 2022.

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National Law Review, Volume XII, Number 49

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Exhibit 24

Comment: Latest US Facebook privacy settlement has significance beyond the numbers

16 Feb 2022 | 00:04 GMT | **Comment**

By Mike Swift

Facebook's newly revealed \$90 million privacy settlement is another data point that illustrates the growing cost of settling class action data-protection litigation in the United States. Yet the proposed settlement, which ends a decade of legal combat between the company now known as Meta Platforms and the plaintiffs, may be most notable for Facebook's agreement to delete the personal data it allegedly collected illegally and for an appeals court decision that has widened the legal risk of privacy violations not only for tech companies, but also for banks, shoe companies and even makers of yoga pants.

Facebook's agreement to pay \$90 million to settle allegations that it violated the federal Wiretap Act by tracking users on other websites who had logged out of its services would be the seventh-largest US privacy settlement in history — until another, larger settlement inevitably supplants it.

More significant may be the legal commitment by the company now known as Meta Platforms to delete the personal data it collected through that tracking, and to disgorge the full value of the data the plaintiffs say Facebook illegally collected. Those features of the settlement, which are rare and perhaps unprecedented in US privacy and data security litigation, are likely to be echoed in future lawsuits over the misuse of personal data.

The proposed settlement filed with a federal judge in San Jose, California, late Monday evening (see [here](#)) is significantly smaller than the record \$650 million Facebook agreed to pay in 2020 to settle allegations that its facial recognition features violated an Illinois biometric privacy law.

Facebook was sued by the Texas attorney general just yesterday on similar claims under the biometric privacy law of that state (see [here](#)), in a case Attorney General Ken Paxton said could cost Facebook billions of dollars in damages.

The growing expense of data protection settlements was underscored by the fact that last night's settlement would have been the fifth-largest data protection settlement only last year, when the two sides began negotiating their deal. Since then, the proposed \$190 million settlement of the Capital One data breach this month (see [here](#)) and the \$92 million settlement TikTok agreed to pay to settle biometric privacy claims, which won preliminary approval in September (see [here](#)), have eclipsed the Facebook settlement.

Last night's Facebook settlement would have been the second-largest US data protection settlement just three years ago, trailing only health insurer Anthem's then-record \$115 million data breach settlement in 2017 (see [here](#)). Plaintiffs are increasingly receiving direct payments to resolve their allegations, and the deals are bigger than ever, as a string of recent settlements with tech companies illustrate (see [here](#)).

The Facebook tracking litigation has been hard-fought since it was consolidated in the Northern District of California before US District Judge Edward Davila in 2021, a full decade ago. Facebook even contested the name the plaintiffs proposed for the case: "In re Facebook Internet Tracking Litigation." The social media giant won multiple rulings from Davila before a hugely crucial decision by the US Court of Appeals for the Ninth Circuit in 2020 (see [here](#)), which reversed those trial court wins.

Meta said today it decided to settle the long-running case to avoid dragging litigation out indefinitely. "Reaching a settlement in this case, which is more than a decade old, is in the best interest of our community and our shareholders and we're glad to move past this issue," said Drew Pusateri, a Meta spokesperson.

The proposed settlement must be approved by Davila, who could potentially ask for a higher or lower number.

— Data deletion —

Whatever the final settlement number turns out to be, it's a safe bet that future US litigation settlements will kick last night's Facebook settlement farther down the list of the top settlements researched by the plaintiffs (see [here](#)). But money isn't everything, of course, even in class actions.

The deletion of personal data that Facebook allegedly gathered illegally from logged-out users through trackers such as the “Like” buttons that it began deploying on millions of websites after 2010 is perhaps an even more important element of the proposed settlement, David Straite, co-lead counsel for the plaintiffs in the case, told MLex in an interview today.

“We’re not aware of any other data protection class action that alleged improper collection of data, where the data was agreed to be sequestered and deleted” as part of the settlement, Straite said. “If we just secured only on monetary relief — which is important — does that mean the data is still in Facebook’s hands? It’s something we thought was important to delete, and Facebook agreed. So we called this the gold standard” of injunctive relief in privacy settlements.

For now, the data hasn’t been deleted, as it has been sequestered from other personal data stored by Meta in case of appeals, but will be destroyed once the settlement is finalized. The plaintiffs also believe this is the first data protection settlement where the settlement amount completely covers the value of the personal data that was allegedly misused.

Straite was a fledgling member of the plaintiffs’ bar when he flew to Miami in 2012 to argue to the US Judicial Panel on Multidistrict Litigation that the consolidated suits should be called the name that was ultimately endorsed by the MDL panel. Facebook opposed the name because “they just thought the current name suggested liability. It suggested, ‘We’re tracking,’ ” Straite said.

— Ninth Circuit ripples —

The decision handed down by the Ninth Circuit, which Meta unsuccessfully petitioned the US Supreme Court to reverse because it would have “immediate, sweeping, and detrimental consequences” for ad tech businesses, will likely resonate more than the dollar amount of last night’s settlement.

In the less than two years that it has been Ninth Circuit law, that decision has been cited in data-protection litigation scores of times by judges and lawyers in data breach and privacy litigation, most of the time in Ninth Circuit courts that cover much of the western United States, home of many leading US tech companies.

Straite said the Ninth Circuit ruling, by saying plaintiffs have standing to sue because the unlawful copying and monetization of their personal data creates “economic harm,” even if the value of the data in plaintiffs’ hands does not diminish as a result, was an important and lasting precedent. The ripples of that decision have indeed been wide, with the plaintiffs’ research showing that the Ninth Circuit’s Facebook decision was cited more than 50 times in the past 18 months, a total verified by MLex.

Often the 2020 decision has been cited in data protection litigation against tech giants such as Apple, Zoom Video Communications and Google. But it has also become a factor in data protection cases against banks such as Wells Fargo, sneaker makers such as Nike, healthcare providers, and even a maker of yoga pants.

Consider the recent decision by a federal judge in Southern California in a proposed class action against Lululemon, the yoga apparel maker, which turned in part on the Facebook Internet Tracking order by the appeals court.

The privacy suit was brought by a California woman, Mary Yoon, who sued over allegations that Lululemon’s website illegally used tracking software to capture her keystrokes and clicks; pages viewed; shipping and billing information; the date, time, and duration of visit; her IP address; and her physical location.

“The Ninth Circuit recently held that Facebook users had a cognizable privacy interest in browsing data surreptitiously collected by Facebook across the Internet after the user had logged out of his Facebook account,” US District Judge John W. Holcomb wrote, in weighing whether Lululemon’s motion to dismiss should be granted.

Ultimately, the judge used the Facebook Internet Tracking decision to differentiate how the Lululemon case was different, because Yoon did not claim Lululemon tracked her across other websites or apps as Facebook did. “The Court therefore finds that she has not alleged a privacy interest sufficient to state a claim under the California Constitution,” Holcomb wrote, in dismissing many of Yoon’s claims, but with leave to amend.

Prior to the Ninth Circuit decision, courts were split over whether the copying and use of data, without some downstream harm such as identity theft, could qualify as economic harm and give plaintiffs standing to sue.

Significantly, Straite said, the Ninth Circuit determined that “the intrusion itself is the harm. Judge Davila found the same, and the Ninth Circuit affirmed that. That’s important. So I predict the Ninth Circuit will continue to resonate.”

Please email editors@mlex.com to contact the editorial staff regarding this story, or to submit the names of lawyers and advisers.

Related Portfolio(s):

[Data Privacy & Security - Facebook - Davis - In re Facebook Internet Tracking - Litigation over alleged tracking of users who logged out \(US\)](#)

Areas of Interest: Data Privacy & Security

Industries: Communication Services, Information Technology, Interactive Media & Services, Media & Entertainment

Geographies: North America, USA

Topics:

Ad-tech

Data Privacy

Sale of data

Exhibit 25



NEWS > INTERNET & SECURITY

Meta's Settlement Could Be the Beginning of the End of Tracking Cookies

Always remember to log out, warn experts

By [Mayank Sharma](#) Updated on February 17, 2022 11:35AM EST

✓ Fact checked by [Jerri Ledford](#)



Key Takeaways

Meta has paid \$90 million to settle a decade-long privacy lawsuit.

The lawsuit questioned the use of tracking cookies by Meta's Facebook social network.

Privacy experts believe the settlement could force online services to adopt a privacy-first approach.

TECH FOR HUMANS



Jarretera / Getty Images

Tracking cookies are the epitome of predatory data capitalism, say privacy experts who believe Meta's latest record-setting settlement shows the regulators are finally waking up to the harm they cause to end-users.

On February 15, 2022, Meta [agreed to pay \\$90 million](#) to settle its decade-long data privacy lawsuit for its use of tracking cookies to follow Facebook users across the internet.

"This settlement is a huge win for consumer privacy around the world," [Nicola Nye](#), Chief Of Staff at [Fastmail](#), told Lifewire via email. "Regardless of what you might think about the motives behind the settlement, its outcome is a glorious landmark for consumer rights."

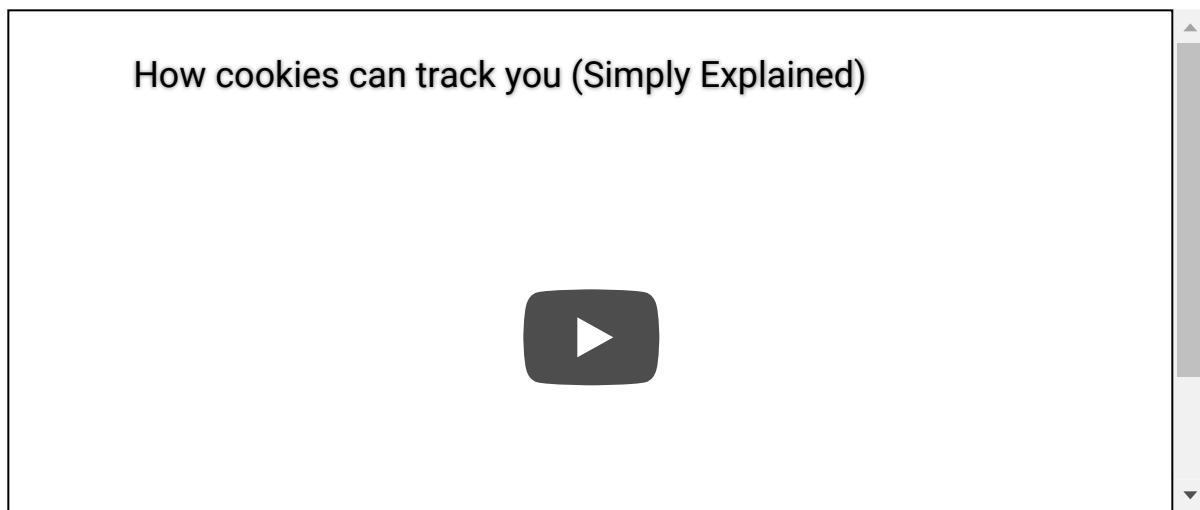
Tracking Cookies

"Facebook, Google, Amazon, and other internet giants that make

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privacy advocate and editor of infosec research at [Comparitech](#), told Lifewire in an email.

Bischoff explained that several other apps and websites bundle third-party elements from these internet giants in the form of advertisements, analytics, and social media widgets. These elements allow internet companies to read the cookie data in our web browsers to identify us.



In the case of Facebook, this enabled the social network to log users' visits and other activity, even on apps and sites it didn't operate, as long as they were using some Facebook element.

"Facebook's terms of service at the time the lawsuit was filed agreed that it would only track users who are logged into Facebook. But Facebook continued to track users via cookies even after they logged out, and in some cases, even if they didn't have a Facebook account at all," said Bischoff.

Nye said the settlement sends a loud and clear message that the days of mechanisms such as tracking cookies are numbered. She believes people are becoming aware of how large organizations have been manipulating and monetizing them and that they're "horrified by it."

However, Bischoff, ever the realist, believes the settlement might not

TECH FOR HUMANS

for convenience means Facebook could continue tracking such users as always.

“

“We look forward to the day when data privacy rights are enshrined in law as a minimum requirement...”

”

[David Straite](#), a data privacy attorney at [DiCello Levitt Gutzler](#), who also served as co-lead counsel on the lawsuit, agreed. He told Lifewire over email that, if anything, the case demonstrates the importance of logging out of any logged-in accounts before moving on to another website and regularly flushing cookies.

“It sounds laborious, but it is the only way to protect your privacy on the internet. If you lived in a dangerous neighborhood, you would lock your door. The internet is the same way: if you don’t take proactive measures to protect your privacy, you will lose it,” said Straite.

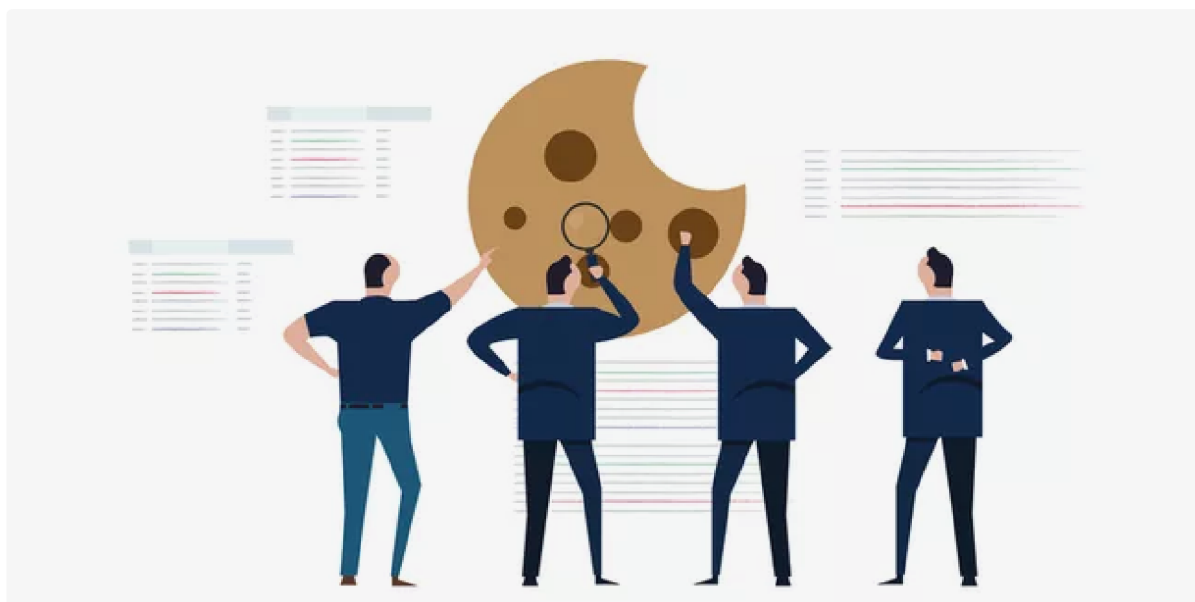
Valid Consent

On the positive side, [Dirk Wischnewski](#), COO/CMO at [B2B Media Group](#), told Lifewire via email that data privacy has moved up companies’ agendas since Meta’s actions of the settled lawsuit that dates back to 2010/2011. He said laws and legislation have since been introduced with the intention of giving users greater control over what personal data is being collected and who’s in possession of

TECH FOR HUMANS

Straite believes this case has helped establish that online data collectors must obtain consent before intercepting users' internet communications, including their browsing history.

"I believe the courts and regulators are now ready to answer the ultimate question: is consent valid if obtained passively, for example, simply by showing a link to a privacy disclosure on web pages you visit. Those conversations are now possible because of the Ninth Circuit's ruling," said Straite.



bakhtiar_zein / Getty Images

Wischnewski believes the settlement highlights the importance of building trust between digital services and its users, and as one of the industry's biggest players, Meta should be setting a precedent for the rest in terms of creating a safe online environment.

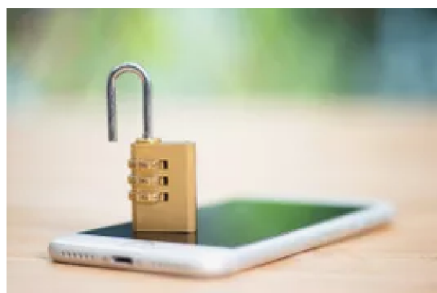
This resonates with Nye. She's of the opinion that individuals shouldn't have to bear the responsibility of figuring out if a company will respect their personal information or not. Nye believes Fastmail, and other privacy-first companies, have demonstrated it's possible to operate a successful business without resorting to invasive tracking techniques.

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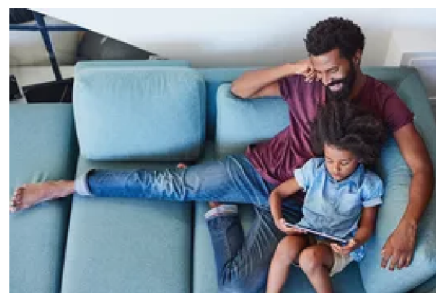
INTERNET & SECURITY

Your Facebook App Might Still Track You, Even After Being Told Not to



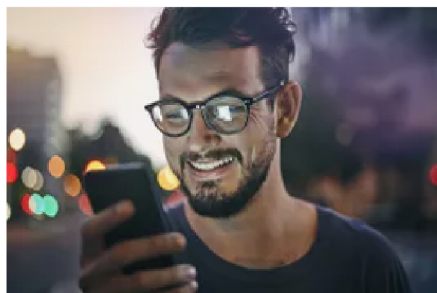
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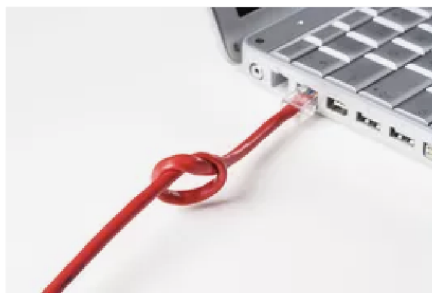
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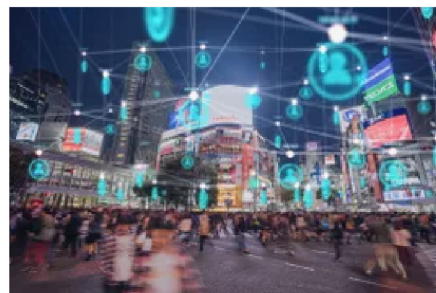
SAFARI

How to Manage History and Browsing Data on iPhone



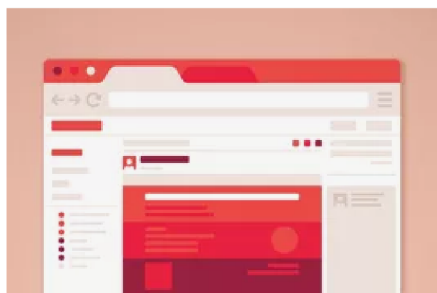
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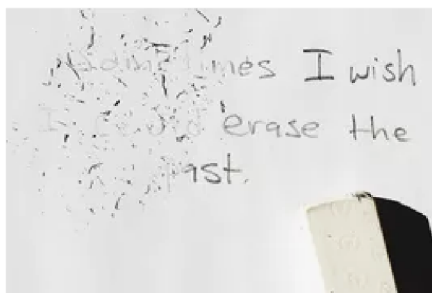


FACEBOOK

Can Facebook Read Your Mind? Stop Facebook Ads From Tracking You



BROWSERS



DATA

TECH FOR HUMANS



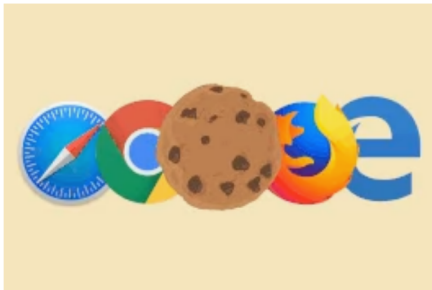
Yum, Internet Cookies! What Are They Made Of?



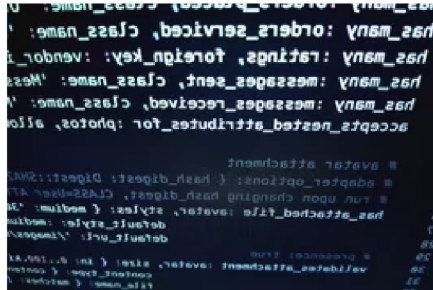
How to Delete Cookies in Chrome and Clear the Browser Cache



9 Ways to Cover Your Tracks on the Internet

**BROWSERS**

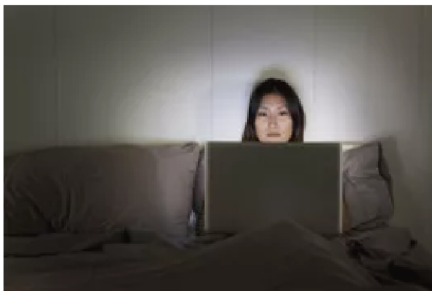
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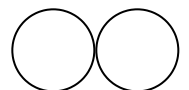
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**BROWSERS**

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Exhibit 26

Holland & Knight

Facebook Stops Fighting Wiretap Act Litigation After More Than a Decade

Social Media Site Pays \$90 Million, Emboldens Class Actions Involving Website Privacy

February 18, 2022

Holland & Knight Cybersecurity and Privacy Blog

[Paul Bond](#) | [Mark S. Melodia](#)

Meta Platforms, Inc. (formerly Facebook) has proposed a national class action settlement of its long-running *Facebook Internet Tracking Litigation*.¹ According to papers filed by the parties, the settlement class would include more than 124 million Americans. While a settlement does not decide legal controversies, a resolution between one of the leading internet companies and more than a third of the nation will have an impact on how Facebook and other tracking technologies are viewed in court and by Congress.

The plaintiffs contend that between April 22, 2010, and Sept. 26, 2011, Facebook tracked user activity on non-Facebook sites for purposes of targeted advertising. Facebook did so by means of Facebook "Like" buttons that website operators throughout the internet integrated into their digital properties. On Sept. 27, 2011, Facebook publicly committed not to use data from Like buttons and other widgets to track users or target advertising to them and to delete or anonymize the data within 90 days.

According to plaintiffs, during the class period, Facebook violated federal and California Wiretap Act law. Plaintiffs allege that Facebook had used the Like buttons to intercept communications between its users and the non-Facebook websites that they visited. Facebook long contended that it was a party to all relevant communications, not a third party, thereby making it impossible for the company to have intercepted or recorded an electronic communication without the website visitor's knowledge.

In a 2020 decision, the U.S. Court of Appeals for the Ninth Circuit held that "Facebook is *not* exempt from liability as a matter of law under the Wiretap Act or CIPA [California Invasion of Privacy Act] as a party to the communication." *In re Facebook, Inc. Internet Tracking Litig.*, 956 F. 3d 589, 608 (9th Cir. 2020). Further, the Ninth Circuit's ruling found a number of named plaintiffs had sufficiently alleged economic harm to survive dismissal. The U.S. Supreme Court denied *certiorari*. When the parties submitted the class action settlement for court approval, the settling parties noted that the Ninth Circuit's ruling has already been cited more than 50 times in reported cases just in the past 18 months.

Proposed Settlement

As consideration for settlement, Meta will pay a non-reversionary amount of \$90 million into a settlement fund. Settlement class members will have to submit a claim to receive money. The settling parties' papers estimate that 4 percent to 5 percent will make a claim, based on a Federal Trade Commission study of 100 class actions. This \$90 million pie will shrink by the amount of attorney fees (not yet specified) and costs of notice and claims administration before it is divided among class members. The settling parties claim this will represent more than 100 percent disgorgement of net profits from the class period. However, the class period was just 17 months a decade ago (April 22, 2010 to Sept. 26, 2011). The \$90 *million* figure is also a tiny fraction of Meta's current \$565 *billion* market cap.

Meta will also "sequester and delete the data that Plaintiffs alleged was wrongfully collected during the Settlement Class Period," which again is deletion of decade-old internet browsing data. Nevertheless, getting any data deletion from a data company in a settlement class action is a significant new development in data class action law.

Takeaways

Holland & Knight

All in all, this settlement seems unlikely to significantly change current operations at Facebook. But the headline numbers will draw further legal scrutiny into how third-party trackers are integrated into websites and mobile apps. Given how little online service operators can influence policies at giants such as Facebook and Google, additional care must be taken with disclosures, the look and feel of websites and mobile apps, implementation of banners, and choice of settings and deployment.

Notes

¹ *In re: Facebook Internet Tracking Litigation*, Case No. 5:12-md-02314, in the U.S. District Court for the Northern District of California.



Paul Bond is a litigation attorney who focuses his practice in the areas of data security, privacy and artificial intelligence. He has assisted clients defending tech- and data-related class actions, including website wiretap litigation and cyberattack and ransomware class actions; major cybersecurity and hacking litigation in the business-to-business and employment contexts; and responding to government investigations in these areas.

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Mark Melodia is a privacy, data security and consumer class action defense lawyer in Holland & Knight's New York office and serves as the head of the firm's Data Strategy, Security & Privacy Practice Group. Mr. Melodia focuses his practice on governmental and internal investigations, putative class actions and other "bet-the-company" suits in the following areas: data security/privacy, mortgage/financial services and other complex business litigation, including defamation.

212.513.3583 | Mark.Melodia@hklaw.com

Exhibit 27

Exhibit 27 – Lodestar and Expenses By Firm, Pre-Consolidation and Post-Consolidation

Name	Firm	Hours- Total	Lodestar- Total	Hours- Post	Lodestar-Post	Expenses
David Straite	DiCello Levitt	825	\$ 807,638.00	825	\$ 807,638.00	\$ 12,087.69
	Kaplan Fox	2296.2	\$ 1,896,501.50	2296.2	\$ 1,896,501.50	\$ 105,913.52
	Straite PLLC	5.8	\$ 6,380.00	5.8	\$ 6,380.00	\$ 10,582.18
	Stewarts	1273	\$ 1,046,386.50	744	\$ 586,336.00	\$ 10,694.13
	TOTAL	4400	\$ 3,776,128.50	3871	\$ 3,316,078.00	\$ 142,329.33
Stephen Grygiel	Keefe Bartels	532.8	\$ 574,332.50	416.6	\$ 440,020.00	\$ 20,164.50
	Grygiel Law	605.2	\$ 664,510.00	605.2	\$ 664,510.00	\$ 15,600.54
	Silverman	457.3	\$ 471,384.50	457.3	\$ 471,384.50	\$ 45,261.19
	TOTAL	1595.3	\$ 1,710,227.00	1479.1	\$ 1,575,914.50	\$ 81,026.23
Jay Barnes	Barnes & Assoc	710.5	\$ 769,860.00	583.7	\$ 641,230.00	\$ 16,172.63
	Simmons Hanly	328.9	\$ 331,257.50	328.9	\$ 331,257.00	\$ 16,653.92
	TOTAL	1039.4	\$ 1,101,117.50	912.6	\$ 972,487.00	\$ 32,826.55
James Frickleton	Bartimus Frickleton Robertson and Rader	468.3	\$ 305,445.00	295.4	\$ 200,050.00	\$ 22,817.83
Marjery Bronster	Bronster Fujichaku Robbins	535.5	\$ 414,618.00	446.6	\$ 346,446.50	\$ 8,175.91
Steve Gorny	Gorny Dandurand LC	9.5	\$ 5,700.00	9.5	\$ 5,700.00	\$ -
Billy Cunningham	Burns, Cunningham & Mackey	318.7	\$ 125,057.50	271.1	\$ 105,137.50	\$ 2,773.89
Billy Murphy	Murphy Falcon and Murphy	879.85	\$ 819,985.00	565.15	\$ 551,875.00	\$ 40,000.00
Paul Kiesel	Kiesel Law	257.61	\$ 210,620.00	210.26	\$ 163,943.50	\$ 4,426.45
Andrew Lyskowski	Bergmanis Law Firm LLC	184.2	\$ 92,100.00	74.4	\$ 37,200.00	\$ 4,390.67
Barry Eichen	Eichen Crutchlow Zalow LLP	1383.02	\$ 849,928.33	757.85	\$ 467,550.00	\$ 18,491.50
Eric Lansverk	Hillis Clark	120.1	\$ 52,562.00	91	\$ 40,194.50	\$ 1,311.37
Matthew Wessler	Gupta Wessler	250.02	\$ 186,610.00	250.02	\$ 186,610.00	\$ -
TOTALS		11441.5	\$ 9,630,876.30	9,233.98	\$ 7,969,186.50	\$ 355,517.92

Exhibit 28

Exhibit 28

Lodestar by Task Code

American Bar Association Uniform Task-Based Management System Litigation
Code Set

L100	12.0	\$ 467.50
L110	24.4	\$ 18,226.50
L120	3007.4	\$ 2,401,440.80
L130	485.9	\$ 387,330.00
L160	1371.1	\$ 1,341,528.00
L190	112.1	\$ 127,297.00
L200	55.6	\$ 13,650.00
L210	1092.5	\$ 851,971.50
L230	606.4	\$ 529,653.00
L240	1969.0	\$ 1,838,890.00
L250	487.5	\$ 421,440.00
L260	84.8	\$ 43,762.50
L300	34.5	\$ 2,077.50
L310	320.3	\$ 270,693.50
L320	338.4	\$ 258,423.00
L330	12.5	\$ 8,875.00
L350	175.6	\$ 170,056.00
L500	18.0	\$ 641.50
L510	244.3	\$ 148,824.00
L520	739.9	\$ 626,731.50
L530	221.0	\$ 168,897.50
TOTALS	11413.2	\$ 9,630,876.30

Exhibit 29

Exhibit 29

Lodestar by Year (pre-consolidation and post-consolidation)

Pre-consolidation by year:

2011	953.70	\$ 667,745.80
2012	1,353.80	\$ 1,010,183.50
Grand Total	2,307.50	\$ 1,677,929.30

Post consolidation by year:

2012	2,773.1	2,413,869.00
2013	345.6	288,922.5.00
2014	423.7	362,017.00
2015	473.4	331,598.50
2016	827.4	777,105.50
2017	861.4	733,746.00
2018	765.7	558,523.00
2019	324.9	250,836.00
2020	324.8	289,979.50
2021	1,519.5	1,501,479.00
2022	466.9	444,871.50
Grand Total	9,106.00	\$7,952,947.00

Exhibit 30

Exhibit 30

Unreimbursed Expenses

MDL Action:

Copying	3,336.35
Teleconference	2,039.86
Online research	104,987.79
Delivery/messenger	3,035.6
Postage	227.72
Local Travel	1,683.74
Travel, Out-of-Town	89,481.54
Travel meals	30,380.61
Court fees	17,032.68
Witness fees	10.00
Exhibits	2,396.9
Litigation Support	18,930.54
Experts	41,525.01
Mediation	24,235.00
Consultants	13,043.71
Other	3,170.87
Grand Total	\$355,517.92

State Court Action:

Copying	\$1,560.15
Online Research	\$17,612.77
Postage	\$201.05
Local Travel/Parking	\$733.87
Out-of-town Travel	\$5,770.66
Travel Meals	\$510.90
Court Fees	\$6,159.33
Trial exhibits	\$20.01
Litigation Support	\$4,624.08
Conference Calling	\$29.12
Reference Materials	\$312.01
Grand Total	\$37,533.95

Exhibit 31

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE FACEBOOK INTERNET
TRACKING LITIGATION

Case No. 5:12-MD-2314-EJD

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR ATTORNEYS' FEES,
EXPENSES, AND SERVICE AWARDS**

Judge: Hon. Edward J. Davila
Courtroom: 4—5th Floor
Date: October 27, 2022
Time: 9:00 a.m.

THIS DOCUMENT RELATES TO
ALL ACTIONS

Presently before the Court is the Motion of the Named Plaintiffs/Settlement Class Representatives Plaintiffs for an Order on their Motion for an Award of Attorneys' Fees, Expenses and Service Awards ("Fee Motion"). Having overseen this consolidated class action case in the District Court since its transfer from the MDL Panel over ten (10) years ago, the Court is extremely familiar with the claims and defenses in this litigation, the litigation history, including three successive consolidated complaints, three successive and successful motions to dismiss, an appeal to the Ninth Circuit and a petition for certiorari to the United States Supreme Court, and the subsequent mediated settlement and preliminary settlement approval pursuant to the Court's March 31, 2022 Order. [ECF 241].

In addition to the Court's long history with this case, and knowledge of the pleadings, motions and other filings in this case, the Court has, in particular, for purposes of ruling on the Fee Motion:

- Reviewed the Fee Motion and all of its supporting documents, including the accompanying Declarations of the members of the Plaintiffs' Counsel Executive Committee; the Declaration of Margery Bronster, the Chair of the AG/Settlement Advisory Committee; the Joint Declaration of David A. Straite and Stephen G. Grygiel, the Lead Counsel; the Declaration of Matthew Wessler, Supreme Court Counsel; and the Declaration of Steven Weisbrot of Angeion, the Notice and Claims Administrator;
- Reviewed the Named Plaintiffs' Motion and Incorporated Memorandum of Law In Support of Final Approval of Proposed Settlement and its accompanying documents and exhibits;
- Reviewed the relevant terms of the underlying Settlement Agreement;
- Reviewed all of the filed objections to the proposed settlement; and
- Held oral argument in open court on October 27, 2022 at which all parties and other interested persons, including objectors, were afforded an opportunity to speak.

FOR GOOD CAUSE APPEARING, IT IS HEREBY ORDERED AS FOLLOWS:

1. The Fee Motion is granted: The Court awards the Settlement Class Counsel the requested sum of \$26,100,000 (the "Fee Award"), which is 29% of the non-reversionary Settlement fund:

- a. The Court awards this amount, which is above the 25% benchmark, for a number of reasons, including, in particular: (i) the important injunctive relief obtained for all class members through the sequestration and deletion of the data allegedly wrongfully collected by the Defendant; (ii) the excellent monetary recovery, particularly in light of the many risks of the

case and the skill of the Defendant's counsel; (iii) the important pro-privacy changes in the law that resulted from Settlement Class Counsel's work; (iv) the long duration, entirely contingent and risky nature of the litigation; and (v) the perseverance, skill and dedication Settlement Class Counsel demonstrated throughout the litigation.

- b. The Court directs that the Fee Award may be distributed to Lead Class Counsel, for their allocation to other counsel, immediately upon the Defendant's funding of the balance of the Settlement Fund.

2. Further, the Court grants/denies the Settlement Class Counsel's request for \$393,048.87 in unreimbursed expenses. The Court finds that the expenses were reasonably incurred in the prosecution of this case, are of the nature and amount customarily required for such litigation, and directs that this amount be added to the Fee Award and disbursed together with the Fee Award as set forth in Paragraph 1(b) above.

3. Further finding that the MDL Settlement Class Representatives (Perrin Davis, Dr. Brian K. Lentz, Matthew Vickery and Cynthia Quinn) fulfilled all of the duties of class representatives and ably and substantially assisted Class Counsel throughout this litigation, the Court hereby grants/denies the requested \$5,000 Service Awards for each of them, to be paid within fourteen (14) days from the Effective Date of the Settlement, as specified in the Settlement Agreement. [ECF 233-1, Ex. 1, § 11.5].

4. Concluding that the State Court Settlement Class Representatives (Ryan Ung, Chi Cheng, and Alice Rosen) ably fulfilled the duties of class representatives in the state court action, the Court hereby grants/denies the requested Service Awards of \$3,000 for each of them, to be funded and paid at the same time as the Service Awards to the MDL Named Plaintiffs, as

described in the preceding paragraph of this Order.

5. Pursuant to the Settlement Agreement [ECF 233-1, Ex. 1, § 15.4], the Court will, as the parties have agreed, retain jurisdiction over the implementation and enforcement of the Settlement Agreement and Final Approval Order.

Dated: _____

Hon. Edward J. Davila
District Judge