



FORM 109  
( RULE 22-2 ) (2) AND (7) )

Redacted version of the original affidavit of Christopher Plambeck  
Filed pursuant to the Order of Madam Justice Griffin  
dated October 11, 2013  
(Original affidavit not filed)

This is the 1<sup>st</sup> affidavit  
of Christopher Plambeck  
in this case and was made on  
March 26, 2013

No. VLC-S-S-122316

Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

DEBORAH LOUISE DOUEZ

PLAINTIFF

AND:

FACEBOOK, INC.

DEFENDANT

Brought pursuant to the *Class Proceedings Act*, R.S.B.C. 1996, c. 50

**AFFIDAVIT OF CHRISTOPHER PLAMBECK**

I, Christopher Plambeck, of Los Altos, California, SWEAR THAT:

1. I am currently employed by the Defendant, Facebook, Inc. ("Facebook"), as Director, Monetization Analytics. I have been employed by Facebook for more than three years. In my current role, I manage a team responsible for supporting various business functions, including partnering with product and engineering teams to provide data insights about Facebook's business strategy and products.

2. Based on my overall experience working for Facebook, I have general knowledge of the functioning and layout of the Facebook website, certain of the data that Facebook maintains, and Facebook's marketing products, including Sponsored Stories. I have personal knowledge of the matters deposed to herein except where stated to be based on information and belief, in which case I believe the same to be true.

3. Facebook logs and maintains certain data in order to operate and analyze the functioning and performance of the Facebook service. Much of this data is generated by Facebook's one billion users ("Users"), who upload and share content—status updates, profiles, photographs, videos, comments, messages, and more—all of which Facebook stores for the use of its Users. Facebook's Users generate an average of 2.7 billion "Likes" and Comments each day, and Facebook stores more than 100 petabytes (100,000 terabytes or 100 quadrillion bytes) of photos and videos.

4. The statements that follow are based on my review of the data that Facebook maintains in the ordinary course of its business, and, in some instances, the queries performed of that data.

#### **Name and Profile Picture Changes**

5. Facebook requires Users to enter their name in their basic profile information. Facebook also gives Users the ability to upload and select Profile Pictures, which Users may change at any time. A Profile Picture is not required to be an actual image of the User, and some Users do not use photos of themselves as their Profile Pictures.

6. To the best of my knowledge, Facebook has no practical ability to verify whether (i) each User has supplied his or her legal name, or a derivative thereof, or whether the provided

name otherwise bears any relation to the User's actual name; or (ii) each User's profile picture contains his or her likeness. Some Facebook Users have profile pictures that are not their own likeness and/or use a pseudonym.

7. Facebook's records indicate that approximately [REDACTED] Users who Facebook can reasonably ascertain are currently located in British Columbia, Canada ("BC Users"), changed their Facebook usernames at least once between January 12, 2013 and March 10, 2013.

8. Facebook's records indicate that approximately [REDACTED] BC Users changed their profile pictures at least once between January 12, 2013 and March 10, 2013.

**Information Regarding the Proposed Class**

9. Facebook's records indicate that, as of March 10, 2013, there were approximately 3.5 million BC Users.

10. Facebook's records indicate that, between September 9, 2012, and March 9, 2013, approximately 1.8 million BC Users appeared in Sponsored Stories.

11. Facebook's records indicate that, between September 9, 2012, and March 9, 2013, more than [REDACTED] Sponsored Story impressions in which a User's name or profile picture appeared were delivered to BC Users.

12. Facebook's records indicate that, between September 9, 2012, and March 10, 2013, approximately [REDACTED] BC Users ran advertising campaigns on Facebook that included delivery of Sponsored Story impressions.

**User Visits to Help Center Pages**

13. Facebook's records indicate that between December 14, 2012 and March 10, 2013, the following number of unique BC Users visited the specified pages in the Facebook Help Center: (i) approximately 2,200 visited the "Interacting with Ads" webpage, located at <https://www.facebook.com/help/499864970040521>; and (2) approximately 97,000 visited the "Advertising on Facebook" webpage, located at <https://www.facebook.com/about/ads>.

**Page "Like" and "Unlike" Data**

14. Through privacy settings, Facebook allows Users to specify whether certain categories of their Facebook Page Likes will be shown publicly, only to their Friends, to a custom group of Friends, or to "Only Me." The "Only Me" setting means that a User's Page Likes are visible only to the User him/herself.

15. Facebook's records indicate that, as of March 7, 2013, approximately [REDACTED] BC Users had set their privacy settings for at least one category of their Page "Likes" to "Only Me".

16. Facebook's records for just 7 selected Facebook Pages indicate that, between January 1, 2013 and March 13, 2013, Users "Unliked" these 7 selected Facebook Pages more than [REDACTED] times. (The Facebook Pages reviewed were for [REDACTED] [REDACTED] and [REDACTED]) Based on sampled data, Facebook's records also indicate that, between September 18, 2012 and March 18, 2013, Users worldwide "Liked" more than [REDACTED] pages and "Unliked" more than [REDACTED] Pages.

17. Facebook's records indicate that, between February 11, 2013, and March 11, 2013, more than [REDACTED] BC Users clicked the "Like" button in Sponsored Stories.

**Social Ads**

18. Based on sampled data, Facebook's records indicate that, between February 29, 2012 and March 11, 2013, Facebook displayed more than [REDACTED] Ads paired with social content ("Social Ads") impressions in Canada.

19. Facebook provides a setting for Users to "opt out" of having their social actions paired with advertisements (social ads). Facebook's records indicate that, as of January 2011 and March 2013, approximately [REDACTED] and [REDACTED] BC Users had opted out of Social Ads, respectively.

**Additional Data**

20. Based on sampled data, Facebook's records indicate that, in 2012, the daily number of clicks on Facebook Like buttons appearing on third-party websites worldwide was approximately [REDACTED].

21. Based on sampled data, Facebook's records indicate that as of March 15, 2013, the number of third-party domains worldwide (i.e., non-Facebook websites) that displayed the "Like" button at least once in the last thirty days was approximately [REDACTED].

22. I am aware that Facebook has exported sampled data between January 26, 2013, and March, 10, 2013, that shows, for each day, (i) an estimate of the number of unique Users worldwide who Liked (or "fanned") a Page ("unique users"), (ii) an estimate of the number of Pages worldwide that were fanned ("unique pages"), and (iii) an estimate of the total number of times any User worldwide fanned a Page ("raw count"). The exported data appears in a file titled "User - Actions (All).csv" and a copy is attached as **Exhibit "A"**.

23. I am aware that Facebook has exported sampled data that shows the estimated number of Sponsored Stories that were served worldwide between January 26, 2013, and March 12, 2013. The exported data appears in a file titled "SSimps.csv" and a copy is attached as **Exhibit "B"**.

**Information Regarding Deborah Douez and Petre Capota**

24. Facebook's records indicate that proposed class representative Deborah Douez has appeared in Sponsored Stories between September 10, 2012 and March 10, 2013 for pages she Liked such as [REDACTED]

[REDACTED]

[REDACTED]

25. [REDACTED]

[REDACTED]

**Purpose**

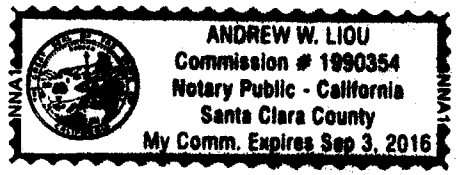
26. I make this Affidavit in support of Facebook in responding to the Plaintiff's application for certification. I know of no fact material to the application for certification that has not been disclosed in this affidavit.

SWORN BEFORE ME )  
at SAN MATEO COUNTY )  
California )  
on MARCH 25, 2013 )

*[Handwritten Signature]*

*[Handwritten Signature]* )  
A Notary Public in and for the State of )  
California )

ANDREW LIU  
Name



This is **Exhibit "A" [SEALED]** referred to in the  
Affidavit of Christopher Plambeck, sworn  
before me, this 25<sup>TH</sup> day of MARCH, 2013

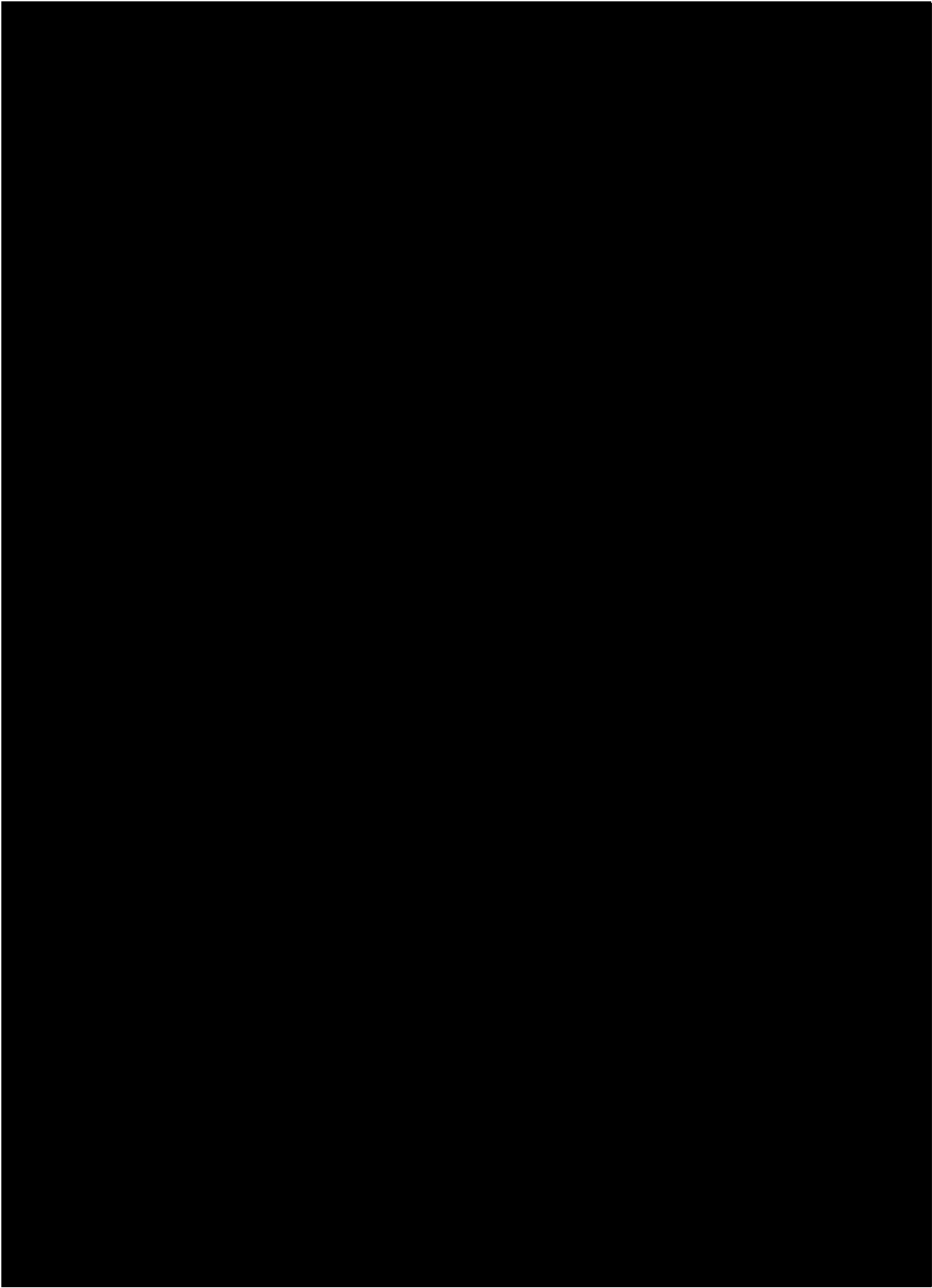


---

A NOTARY PUBLIC IN AND FOR  
THE STATE OF CALIFORNIA







This is **Exhibit "B" [SEALED]** referred to in the  
Affidavit of Christopher Plambeck, sworn  
before me, this 25<sup>TH</sup> day of March, 2013



A NOTARY PUBLIC IN AND FOR  
THE STATE OF CALIFORNIA



[SEALED]

