

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
[REDACTED]	Files with salted and hashed Facebook users' PII are stored in this data store. The data store is used by [REDACTED]	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
[REDACTED]	This is used in the delivery flow for targeting, ranking features, and as information for front-end to display. The social system is not, however, a general purpose system like [REDACTED] — it is only for ads. Thus, all objects returned are being actively targeted by an ad.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
[REDACTED]	[REDACTED] is a real-time service that performs a join between different event streams and features. [REDACTED] is the core of the training data preparation flow. It is a realtime joiner of ads events to prepare training data for ads ranking models. The ads events include features, impressions, clicks, conversions, and (mainly) negative-feedback events.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]

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<p>(MySQL)</p>	<p>It is the backbone for the Core Ads system not only just Ads buying but also other critical consumers of the [REDACTED] etc.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>[REDACTED] is a set of components that together form the platform storage layer in [REDACTED] system to provide distributed file system storage. As a common platform layer, this is used by multiple teams across Ads org for various business applications for data storage needs.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
<p>Akkio</p>	<p>Akkio Locality is used to improve latencies and reduce replicas for usecases across different datastores. We do this by tracking which regions each ushard is being accessed from and limit the replicas for each ushard to three (or some configurable) number of regions.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>Serves ad-side and user-side features for AdFinder, AdPublisher, Prospector, FBShops</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>

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[REDACTED]	<p>The internal metadata is in MySQL and follows general MySQL backup flow.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
[REDACTED]	<p>[REDACTED] is Facebook's end-to-end distributed tracing system that provides observability into the execution of requests. We support traces across systems (web, mobile, and services) and provide a general purpose platform for near-real time analysis.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
[REDACTED]	<p>[REDACTED] provides a [REDACTED]. These can be facts implicitly learned from other places in Facebook - user profile, Messenger chats, etc, or explicitly provided by the user to the [REDACTED] as part of a dialog.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
[REDACTED]	<p>[REDACTED] is not really a data store per se, it is a platform that allows users to schedule jobs, mostly from code, to be executed outside of the path of a request, thus asynchronously.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>

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	<p>Storing application data for the [REDACTED] app (which is a zero to one [REDACTED] app that provides a social rapping experience)</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] [REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>To identify the user, provide scores/leaderboard, connect players to other players, and provide analytics data.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] [REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>[REDACTED] is a snapshot and shadow testing framework used for functional, correctness and performance testing of Spark, Hive and Presto.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] [REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>It is used to query and analyze internal data, produce visuals of analyses and share them with others.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] [REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>

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BigBox VR (M&A)	A system that provides game player and play data support.	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
[REDACTED]	[REDACTED] is the service which manages the persistent storage of messages for Facebook Messenger. It is the successor of [REDACTED] and was created in order to migrate from [REDACTED] reliance on HBase as the backing store to MySQL with the [REDACTED] storage engine.	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
[REDACTED]	[REDACTED] is the project to use the Presto engine as the backend for Atlas Reporting. [REDACTED]	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
[REDACTED]	[REDACTED] is a team within [REDACTED] dedicated to the performance and delivery of media content of all Facebook products such as Facebook, Instagram, WhatsApp, Oculus and more.	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>

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[REDACTED]	Provide tools and storage to author, test, and distribute configuration data	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
[REDACTED]	Provide automated testing of FB developed hardware	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
[REDACTED]	[REDACTED] is used to store contributors and contains data keyed off of the [REDACTED] that allows for real-time attribution.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
[REDACTED]	[REDACTED] is a digital asset management (DAM) tool, sometimes just referred to as a DAM. Properly speaking a DAM is a digital tool for asset management	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
	<p>provides efficient disk-based sort-merge for warehouse queries at FB scale.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>is an in-memory realtime analytics database that enables users to execute sub-second moderately complex SQL queries on tables up to [REDACTED]</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>is a fault tolerant scalable workflow solution, designed to let people specify a series of steps to be followed and then ensuring the steps lead to an expected conclusion.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>is an interactive tool for querying multiple data sources at Facebook</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
	<p>The [REDACTED] is an abstraction in our www codebase for reliably deleting data graphs from online data stores and being able to recover efficiently from errant deletions if they're discovered quickly enough. It's our main system used to satisfy our User Data Deletion Policy for data stores which support point deletes.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] [REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>Generate signals from ad delivery that can be used to provide advertiser guidance</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] [REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>It is a Core Systems infra service which allows other infra/product teams build dependencies between FOQS queue items.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] [REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>[REDACTED] is a MySQL database that runs on a developers devserver.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] [REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
	<p>The DevOps Investigations team tackles various data-abuse related escalations and instances, ranging from [REDACTED] from the FB platform</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>[REDACTED] is a compute engine for large-scale graph analytics.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
<p>Downpour Interactive (M&A)</p>	<p>User accounts game player data for Onward from Downpour</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>[REDACTED] is a simple, reliable, low dependency object storage system, with only four high-level operations: put, get, delete, and list.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
<p>(Novi)</p>	<p>(Novi) is a fast scalable eventually consistent point-in-time structured storage for Novi / F2 risk and compliance assessments</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
<p>[REDACTED]</p>	<p>The [REDACTED] Team is focused on delivering scalable storage solutions to support the applications and virtualization environment that run the internal business at Facebook.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
<p>[REDACTED]</p>	<p>Index database focused on low latency search, Primarily an open source project being supported at Facebook.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED] provides durable, DR compliant, and highly available online storage. We aim to provide solutions to some of the hardest distributed storage problems in the industry at scale.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>This is one of the various databases that powers the Social Graph. Facebook produced each Named Plaintiff's DYI file, which for each individual user represents the most complete and best compilation of data Facebook maintains associated with that user, and the best available compilation of the data about that user in the Social Graph, in a human readable form.</p>

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
F3	The Facebook Feature Framework (F3) is Facebook's next generation feature engineering platform.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
[REDACTED] (MySQL)	Iris (aka Generic Iris) is a persistent queue service that guarantees in-order delivery to either devices or backend services.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
[REDACTED]	[REDACTED] is a top-level directory of the [REDACTED] where our backend services code lives. It is a federation of projects, written in a number of languages.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
FBLearner / AI Infra ([REDACTED])	Enables all Facebook engineers to build AI applications and perform AI researches by providing scalable, reliable, efficient, easy-to-use and compliant AI services that power all parts of AI workflow, from feature engineering, to training, to inferring, during both experimentation and model productionization.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
	<p>██████████ is a system built to ██████████ over MQTT as transport. ██████████</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████</p>
	<p>██████████ is Facebook's scalable binary distribution system.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████</p>
<p>FOQS</p>	<p>FOQS powers the ██████████ Tier for job processing. It provides a number of features important to that use case including prioritization of items, a lease expiry for items in the queue, and explicit timing for when an item in the queue is ready for processing.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████</p>
	<p>Keeping the ██████████ app ██████████ running (https://apps.apple.com/us/app/id1509378877)</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████</p>

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
██████████	██████████ is an eventually consistent key-value data store fully implemented in Erlang and designed to run within WA infrastructure. It can run embedded within the backend itself or as a remote tier managed by ██████████ team.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████
██████████	██████████ provides tooling to support external research initiatives. ██████████ tooling primarily consists of a customized JupyterHub deployment that provides restricted access to ██████████ datasets.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████
██████████	For teams to track goals information (objectives, outcomes, metrics for how to measure success)	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████
Hive	"Hive" refers to several separate systems at Facebook: Hive Tables; Also called Data Warehouse, Hive Query Engine (also called Corona): An engine that executes queries written in FB-HiveQL, and Hive Query Language (HiveQL): A query language data analysis.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	As Facebook has disclosed previously, Hive stores millions of data sets that it uses for internal analytics, product development, and other business functions. As discussed in detail in the Declaration of Mengge Ji, ██████████ ██████████

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

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[REDACTED]	[REDACTED] is an end-to-end solution for location-anchored content discovery for World AR. At the core is Geo Indexing, a component for retrieving content based on lat/long positions and 2D polygons.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
Laser	Laser is a service that indexes data in Hive and [REDACTED] to provide high throughput, low latency lookup. Use this for indexing warehouse data.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
(MySQL)	[REDACTED] is a hostname-scheme that exists to run Logtailer Servers. [REDACTED] are designed to be spread thinly across racks to allow that Logtailers can always be allocated in the different racks as the MySQL instances they are tailing from.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
(MySQL)	[REDACTED] is a hostname-scheme that exists to run Logtailer Servers. [REDACTED] is a system within this framework. [REDACTED] are designed to be spread thinly across racks to allow that Logtailers can always be allocated in the different racks as the MySQL instances they are tailing from.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]

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Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
[REDACTED]	Deliver live video to viewers	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED] an ongoing moving target, given that the data in many of these data systems is not static.</p>
[REDACTED]	Transcode live video with high quality efficiently, reliably, and low latency.	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
[REDACTED]	Provide a cache for resources available internally at facebook	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
[REDACTED]	[REDACTED] is a new experience to enable reliable realtime storage and efficient search and retrieval for unstructured logging data generated by all applications across Facebook.	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>

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Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
██████████	██████████ is a distributed data store for sequential data. It offers high durability and availability under a variety of workloads and failure scenarios.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████, and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope ██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████
██████████	██████████ abstracts away the complexities of using dictionary-based compression. It does all the required state management internally (sampling, training, benchmarking, distributing, versioning, garbage collecting, etc.), exposing the same, simple, stateless interface you expect to see from a compression algorithm.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████, and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████
██████████	██████████ is a managed horizontally scalable BLOB storage service accessible via Thrift and HTTP. It is analogous to Amazon S3.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████, and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	This is one of the various databases that powers the Social Graph. Facebook produced each Named Plaintiff's DYI file, which for each individual user represents the most complete and best compilation of data Facebook maintains associated with that user, and the best available compilation of the data about that user in the Social Graph, in a human readable form.
Memcache	Memcache refers to our implementation of memcached, along with its associated client libraries and APIs. Memcache was initially deployed as a distributed in-memory caching layer between the web tier and MySQL ██████████	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████, and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████

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[REDACTED]	Managing metadata for Data Warehouse	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
[REDACTED]	[REDACTED] is the next-generation mercurial-compatible version control server (to scale our monorepo setup)	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
[REDACTED]	A thrift service that composites audio and video streams and connects RTC infra with Live Infra.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
MySQL	The MySQL team works to keep all MySQL databases up and running 24x7. We also handle the lifecycle of database assets, and various services to support MySQL at scale.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	This is one of the various databases that powers the Social Graph. Facebook produced each Named Plaintiff's DYI file, which for each individual user represents the most complete and best compilation of data Facebook maintains associated with that user, and the best available compilation of the data about that user in the Social Graph, in a human readable form.

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
	Small entrepreneurial teams building standalone app experiments.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
Novi [REDACTED]	Novi [REDACTED] is a queueing system storing user data.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
Oculus [REDACTED]	Logging for understanding user interactions on Explore, Store, and other Oculus surfaces	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
	Storing offline messages	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
	<p>allows you to focus on the problem of "storing/reading a few bytes" at a basic level. It provides the user writing the data with the flexibility to store the bytes on the storage systems of their choice, while solving the reader's "where do I get that data" problem.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—the (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data,</p>
	<p>is a data storage and sync service, which supports periodic polling as well as real time updates to the Facebook family of apps. Today, it powers various product features such as Messenger Contacts, Messenger Stories, Mobile Config etc.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—the (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data,</p>
	<p>Used for Lift and allows for a real-time join between opportunities (as well as some impression and click data) to conversions.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—the (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data,</p>
<p>(MySQL)</p>	<p>contains historical transaction data, primarily from the time frame of 2009-2014, that is generally unused.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—the (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data,</p>

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
(MySQL)	[REDACTED] teams are part of the Facebook Financial (F2) Org and power all [REDACTED] across all products and family of apps.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
[REDACTED]	supporting [REDACTED] users throughout the company.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
(Viewstate)	Cache for the newsfeed data	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
[REDACTED]	Root cause analysis for metric movements (ex: Why did Facebook DAP go down between today and 7 days ago?)	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
	<p>██████████ is a storage service on top of ██████████ designed to store user side features.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████</p>
	<p>Power user presence (green dot) for Facebook, Instagram and Messenger users.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████</p>
	<p>██████████ is a fully managed general purpose Stream Processing as a service solution (i.e. real-time data-processing).</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████</p>
	<p>It is used to load realtime data into our leaf machines</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████</p>

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
[REDACTED]	Aggregation of call logs of different types by client session (i.e. one call connection) and call.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED].
[REDACTED]	Stores user interaction with the feed(i.e. all the stories user has seen)	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED].
Ready at Dawn (M&A)	Ready at Dawn is a video game studio acquired by Facebook.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED].
[REDACTED]	[REDACTED] is a data pipeline used for payment reconciliation	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED].

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
	<p>provides network attached data volumes to compute nodes, allowing services to scale compute and storage needs independently.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>To store long-term research artifacts submitted by UX Researchers for easy discovery.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>is a persistent key-value store library which can be used by anyone to store data on disk.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	<p>is a research / experimentation to do self-supervised learning on copy of production data</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
	Performance and Efficiency regression A/B testing platform.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
SFTP	SFTP is a service provided by the EPI team that allows Facebook to exchange data within the company and also with external vendors.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
	[REDACTED] is a service that captures all incoming traffic on a MySQL instance and replays it on another test MySQL instance in real time.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]
	Run batch data processing jobs over msgdb	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
(Novi)	We store user's balance and transactions for the Novi wallet.	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
[REDACTED]	candidate generation for recommendation ranking system	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
[REDACTED]	[REDACTED] is an application developer review tool meant to investigate cases where app devs could be misusing user data.	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
[REDACTED]	[REDACTED] is a general purpose Stream Processing library (i.e. real-time data-processing).	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
Openstack	Openstack is an object storage service being provided by the team. Currently it is aimed to be a low cost solution for archival workloads such as backups and data warehousing.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations— (the DIY tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data,
	is a distributed transactional storage system designed to give full composability across data structures, transactions, and storage encoding.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations— (the DIY tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data,
Tableau Server	Tableau is a business intelligence tool used to create charts, graphs, and other visualizations.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations— (the DIY tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data,
	is a special variant of now deprecated created as part of an effort to consolidate the non-replicated FODB offering to core-data. SRS has two independent instances for feed tracking data and featuredb storage.	As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.	The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations— (the DIY tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data,

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Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
	<p>██████████ can be seen as real-time counter service. It keeps statistics about streams of events, such as counts, unique counts, quantiles (percentiles), mean, and top elements, and it allows dynamic time window queries in real-time.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████</p>
	<p>██████████ is a real-time counter service for high volumes of data.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████</p>
<p>TAO</p>	<p>TAO is a high-performance service for storing, caching, and querying the graph of FBOjects and associations.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>This is one of the various databases that powers the Social Graph. Facebook produced each Named Plaintiff's DYI file, which for each individual user represents the most complete and best compilation of data Facebook maintains associated with that user, and the best available compilation of the data about that user in the Social Graph, in a human readable form.</p>
	<p>Internal tool maintained by Global security to protect Facebook, executives and assets.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████</p>

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<p>(MySQL)</p>	<p>is a grouping of dbtypes that are used for testing.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations— (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data,</p>
	<p>is a low-latency, high-availability, key-value storage system for user data.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations— (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data,</p>
	<p>Provide human readable understanding of user interests that are used to improve personalization in various user facing products.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations— (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data,</p>
	<p>is a tax application used for tax calculation for all FB products (Digital, Ads, Services and Hardware) globally.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations— (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data,</p>

Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data

Data System Name	High-Level Description of Data System	Explanation for Why Additional Information Is Not Readily Available	Explanation for Why Facebook Cannot Determine if the Named Plaintiffs' Data is Stored in the System
	<p>██████████ is Facebook's next generation streaming processing service.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████</p>
	<p>██████████ a platform which offers wifi as a product.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████</p>
	<p>██████████ is a reliable, consistent, highly available, scalable key-value storage service.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>This is one of the various databases that powers the Social Graph. Facebook produced each Named Plaintiff's DYI file, which for each individual user represents the most complete and best compilation of data Facebook maintains associated with that user, and the best available compilation of the data about that user in the Social Graph, in a human readable form.</p>
<p>Generating training data for Instagram ML systems</p>		<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook ██████████ ██████████ and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—██████████ ██████████ (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, ██████████ ██████████</p>

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	Record and serve IG user engagement history.	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	Embedding indexing system	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
	Detect if any feature contains ULL and file the privacy-wave tasks for user verification/remediation	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
Mapillary	Public street-level imagery and map data platform	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>

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<p>Process WhatsApp user support requests</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>
<p>[REDACTED] is a Code Management system owned by Core Systems.</p>	<p>As discussed in the Declaration of David Pope, Facebook has not previously compiled information responsive to the Special Master's Order—including descriptions of the "most common functions and purposes of the data system" and a comprehensive list of "the business units, divisions, or groups that use the data system"—in the course of its prior efforts to inventory its data systems. Facebook [REDACTED] and collecting and vetting further detail about each system would require a similar effort that would be disproportionate to the needs of this case, as Plaintiffs' request to identify "all" user data is not relevant to any pending claims or defenses and the vast majority of such data could not readily be identified by user and/or produced in a format that would be unintelligible outside of Facebook.</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>	<p>The Special Master's Amended Order asks Facebook to determine whether each data system contains data related to a specific Named Plaintiff. The burdens associated with providing that information are not meaningfully different than identifying any specific data relating to a Named Plaintiff within each system, because—as discussed in the Ji and Pope Declarations—[REDACTED] (the DYI tool retrieves data from a number of data systems, but not all). As a result, in order to determine what types of user data are contained within each data system and whether an individual user's data could be identified within that data, [REDACTED]</p>

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]