

## **EXHIBIT 15**

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11 Attorneys for Plaintiffs

12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA  
 14 SAN JOSE DIVISION

15 ANGEL FRALEY; PAUL WANG; SUSAN  
 16 MAINZER; JAMES H. DUVAL, a minor, by  
 and through JAMES DUVAL, as Guardian ad  
 17 Litem; and WILLIAM TAIT, a minor, by and  
 through RUSSELL TAIT, as Guardian ad Litem;  
 18 individually and on behalf of all others similarly  
 situated,

19 Plaintiffs,

20 v.

21 FACEBOOK, INC., a corporation; and DOES 1-  
 22 100,

23 Defendants.

**Case No. CV 11-01726 LHK PSG**

**PLAINTIFF WILLIAM TAIT'S  
 RESPONSES TO DEFENDANT'S  
 INTERROGATORIES**

**SET ONE**

Courtroom: 8  
 Judge: Hon. Lucy H. Koh  
 Trial Date: December 3, 2012

24  
 25 PROPOUNDING PARTY: Defendant FACEBOOK, INC.  
 26 RESPONDING PARTY: Plaintiff WILLIAM TAIT, a minor, by and through  
 RUSSELL TAIT, as Guardian ad litem  
 27  
 28 SET NUMBER: ONE

1 the Nielsen reports discussed publicly by Facebook, documents produced in litigation and  
2 deposition testimony which confirm the worth of the endorsements and the fact that Facebook  
3 charges more for them. The Plaintiffs' right to be paid also stems from the common and  
4 statutory right of publicity (Civil Code section 3344), and from the common law of unjust  
5 enrichment which, provides that noncelebrities are to be compensated for nonconsensual uses  
6 of their names and likenesses in advertisements. The value of my endorsement is at least \$750  
7 per endorsement.  
8

9 **INTERROGATORY NO. 8:**

10 DESCRIBE each instance in which YOU have been offered, and/or have received  
11 compensation or other consideration of any kind to endorse, advertise, suggest, or recommend  
12 any PERSON, organization, cause, good, or service at any time during YOUR life.  
13

14 **INTERROGATORY NO. 8:**

15 Plaintiff endorsed Nike by wearing a t-shirt at Nike's request at a track meet. Plaintiff  
16 received one t-shirt from Nike to wear as consideration for that endorsement.  
17

18 **INTERROGATORY NO. 9:**

19 IDENTIFY the NAME of each of YOUR "Friends" on Facebook that YOU contend  
20 considered YOU a "celebrity," as asserted in Plaintiffs' Opposition to Facebook's Motion to  
21 Dismiss, at 9:3.  
22

23 **RESPONSE TO INTERROGATORY NO. 9:**

24 Plaintiff objects to this Interrogatory as mischaracterizing a statement made in a legal  
25 brief prepared by counsel as being a statement made directly by Plaintiff. Plaintiff objects to  
26 this Interrogatory on the ground that it is information equally available to Facebook. Subject to  
27 those objections and the General Objections, Plaintiff responds as follows: Plaintiff includes  
28

1 all of Plaintiff's "Facebook" friends as those to whom Plaintiff is a "celebrity".

2 **INTERROGATORY NO. 10:**

3 For each piece of content YOU identified in response to Interrogatory No. 2,  
4 DESCRIBE whether each of YOUR "Friends" on Facebook were informed, amused, or  
5 enlightened, had another reaction, and, if so, what that reaction was, or had no reaction, as a  
6 result of learning that YOU "Liked" such content, and state all bases for and facts supporting  
7 your answer.  
8

9 **RESPONSE TO INTERROGATORY NO. 10:**

10 Plaintiff objects to this Interrogatory on the ground that it consists of at least three  
11 subparts. Plaintiff objects to this Interrogatory on the ground that it calls for speculation into  
12 the emotions and mental reactions of third parties, and is vague as to what constitutes any of the  
13 listed responses to pieces of content. Subject to those objections, Plaintiff responds that any  
14 reactions to his using the Like button as to content, would be limited to responses posted on  
15 Facebook, which documents are equally available to Facebook and/or being produced as part of  
16 Plaintiff's history.  
17  
18

19 **INTERROGATORY NO. 11:**

20 DESCRIBE what value, benefit or other consideration, if any, YOU have received,  
21 directly or indirectly, as a result of using Facebook.  
22

23 **RESPONSE TO INTERROGATORY NO. 11:** ^

24 Plaintiff objects to this Interrogatory as vague and ambiguous to the extent that "value"  
25 and "benefit" are undefined, and construes the words to mean monetary compensation or the  
26 ability to access information, or applications / software. Subject to those objections and the  
27 General Objections, Plaintiff responds as follows: Facebook.com offers an easy way to  
28

1 connect to people Plaintiff knows closely, and to new people. Plaintiff also uses Facebook.com  
2 to collaborate on group events, homework and things of that nature. With respect to the  
3 Sponsored Story in which I was featured, I was able to see photos from previous events for  
4 Warrior Dash.  
5

6 **INTERROGATORY NO. 12:**

7 For each of the websites identified in response to Interrogatory No. 6, DESCRIBE the  
8 circumstances under which YOU have shared content with others (including, without  
9 limitation, content CONCERNING a product, service, website, brand, organization, celebrity,  
10 musician, band event, or other content), including, with respect to each piece of content shared,  
11 the date(s) YOU shared the content, a description of the content shared, the website the content  
12 was shared on, and the reasons(s) YOU shared the content.  
13

14 **RESPONSE TO INTERROGATORY NO. 12:**

15 Plaintiff objects to this Interrogatory as overbroad, unduly burdensome, and not  
16 reasonably calculated to lead to the discovery of admissible evidence. Plaintiff has not shared  
17 info via this site.  
18

19 **INTERROGATORY NO. 13:**

20 DESCRIBE all facts supporting YOUR statement that each Sponsored Story in which  
21 YOU appeared was “perceived” by YOUR “Friends” on Facebook.com as a “positive  
22 endorsement[.]” (Opp. To Mot to Dismiss at 21:17-20.)  
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