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21 *Attorneys for Defendant Meta Platforms, Inc.*

22 **UNITED STATES DISTRICT COURT**  
23 **NORTHERN DISTRICT OF CALIFORNIA**  
24 **SAN FRANCISCO DIVISION**

25 MAXIMILIAN KLEIN, et al., on behalf of  
26 themselves and all others similarly situated,  
27  
28 Plaintiffs,  
29  
30 v.  
31  
32 META PLATFORMS, INC., a Delaware  
33 Corporation headquartered in California,  
34  
35 Defendant.

Case No. 3:20-cv-08570-JD

**LETTER OF REQUEST FOR  
INTERNATIONAL JUDICIAL  
ASSISTANCE PURSUANT TO THE  
HAGUE CONVENTION OF 18 MARCH  
1970 ON THE TAKING OF EVIDENCE  
ABROAD IN CIVIL OR COMMERCIAL  
MATTERS**

Judge: Hon. James Donato

1 The United States District Court for the Northern District of California presents its  
2 compliments to the Ministry of Justice of the People’s Republic of China and requests assistance  
3 in obtaining evidence to be used in civil proceedings before this Court.

4 This request is made pursuant to, and in conformity with, Chapters I and II of the  
5 Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters  
6 (the “Hague Evidence Convention”), to which both the United States and the People’s Republic  
7 of China are party.

8 Specifically, the District Court requests assistance in obtaining evidence from non-party  
9 Tencent Holdings Ltd. (“Tencent”), a Chinese entity residing in Shenzhen, the People’s Republic  
10 of China.

11 **SECTION I**

12 **1. SENDER:**

13 The Honorable James Donato  
14 United States District Court of the Northern District of California  
15 450 Golden Gate Avenue  
16 San Francisco, CA 94102  
17 United States of America

18 **2. CENTRAL AUTHORITY OF THE REQUESTED STATE:**

19 International Legal Cooperation Center (ILCC)  
20 Ministry of Justice of China  
21 33, Pinganli Xidajie  
22 Xicheng District  
23 Beijing 100035  
24 People’s Republic of China  
25 Tel: +86 (10) 5560 4537  
26 Fax: +86 (10) 5560 4538

27 **3. PERSON TO WHOM THE EXECUTED REQUEST IS TO BE RETURNED:**

28 The Honorable James Donato  
29 United States District Court of the Northern District of California  
30 450 Golden Gate Avenue  
31 San Francisco, CA 94102  
32 United States of America

*With a Copy to the Parties’ Legal Representatives:*  
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37 **4. SPECIFICATION OF THE DATE BY WHICH THE REQUESTING AUTHORITY**  
38 **REQUIRES RECEIPT OF THE RESPONSE TO THE LETTER OF REQUEST:**  
39

1 The Requesting Authority would greatly appreciate a response to the Request for  
2 Assistance as soon as is practicable, to ensure that the documents are received in a timely manner  
3 for use in the civil proceedings described below.

4 **SECTION II**

5 **IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED**  
6 **APPLICANT HAS THE HONOR TO SUBMIT THE FOLLOWING INFORMATION**  
7 **REGARDING THE INSTANT REQUEST:**

8 **5. (a) REQUESTING JUDICIAL AUTHORITY (Article 3(a)):**

9 The Honorable James Donato  
10 United States District Court of the Northern District of California  
11 450 Golden Gate Avenue  
12 San Francisco, CA 94102  
13 United States of America

14 **(b) TO THE COMPETENT AUTHORITY OF (Article 3(a)):**

15 The People's Republic of China

16 **(c) NAME OF THE CASE AND ANY IDENTIFYING NUMBER:**

17 *Klein, et al. v. Meta Platforms, Inc.*, No. 3:20-cv-08570-JD, United States District Court  
18 for the Northern District of California, San Francisco, CA, U.S.A.

19 **6. NAMES AND ADDRESSES OF THE PARTIES AND THEIR**  
20 **REPRESENTATIVES (Article 3(b)):**

21 **(a) Plaintiffs:**

22 Maximilian Klein

23 Sarah Grabert

24 Rachel Banks Kupcho

25 Affilious, Inc.

26 Jessyca Frederick

27 Mark Young

1 406 Property Services, PLLC

2 Mark Berney

3 Katherine Looper

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5 Representatives:

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30 **(b) Defendant:**  
31 Meta Platforms, Inc.  
32 1601 Willow Road  
33 Menlo Park, CA 94025

34 Representatives:  
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