

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

**GENEVIEVE MAHONEY, a/k/a  
@genmahoney19, an individual,**

**Plaintiff,**

**vs.**

**FACEBOOK, INC.,**

**Defendant.**

**Case No. 3:21-cv-607\_\_\_\_\_**

**Tennessee Case No.: 21C1107**

**DECLARATION OF WILL CAMP**

I, Will Camp, declare as follows:

1. I am an Engineering Manager at Facebook. As part of my responsibilities in that role, I am familiar with the software code maintained by Facebook associated with registering users for Instagram accounts. I am familiar with each of the matters set forth below based on my own personal knowledge, or from my review of records, including records of source code, maintained by Facebook in the ordinary course of business. Records pertaining to historical revisions of source code that I reviewed for purposes of preparing this declaration were created at or near the time that the source code was implemented. If called to testify regarding the facts set forth in this declaration, I could and would testify competently thereto.

2. I have been informed that the plaintiff in this matter registered an Instagram account on [REDACTED] and she registered a second Instagram account on [REDACTED].

3. I have reviewed the source code that established the process for registering an Instagram account on [REDACTED] and [REDACTED] using the Instagram mobile application for [REDACTED] (including [REDACTED] devices. By analyzing the relevant source code, I was able to render an image of the screen that appeared on the user's device, attached hereto as Exhibit 1, during the registration process on each date. The only difference in appearance between the registration

screens on these dates is that the screen that appeared to users on [REDACTED], which is shown in Exhibit 1, included an additional field that would automatically populate a suggested username for Instagram based on the email address submitted by the user.<sup>1</sup>

4. To further confirm my analysis of the relevant source code on each date, I also reviewed screen shots maintained by Facebook in the ordinary course of business that depict the Instagram registration screen on [REDACTED] devices in early 2014 and 2015.

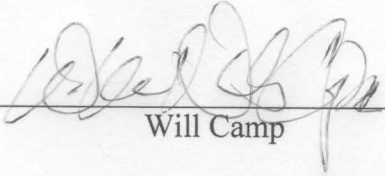
5. The source code associated with the Instagram registration process on both [REDACTED] and [REDACTED] specifically confirms the following aspects of the registration screen on each date as depicted in Exhibit 1:

- a. After providing the information required to establish an account, the user was required to press a button located towards the top-right corner of the screen to complete the account registration process.
- b. Centered at the bottom of the screen was a statement that read, “By tapping to continue, you are indicating that you have read the **Privacy Policy** and agree to the **Terms of Service**.” The size and color of the text used for this statement, relative to other text that appeared on the screen, is accurately depicted in Exhibit 1.
- c. The phrase “Terms of Service” in this statement contained a hyperlink that, if pressed, would direct users to a copy of Instagram’s Terms of Use available at <http://instagram.com/legal/terms/>.

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<sup>1</sup> The email address that appears on the screen is my own email address, which has been redacted in the version included with this declaration as Exhibit 1.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August  
19, 2021 at Mountain View, California.

  
\_\_\_\_\_  
Will Camp

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was electronically filed and served upon the following via the Court's ECF system on this the 30th day of August, 2021:

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