

STATE OF MISSISSIPPI



**JIM HOOD**  
ATTORNEY GENERAL

March 22, 2018

Mark Zuckerberg  
Facebook, Inc.  
c/o Will Castleberry  
1601 Willow Road  
Menlo Park, California 94025  
wcastleberry@fb.com

Re: Facebook Litigation Hold Notice  
Preservation of Relevant Information: Paper Documents and Electronically  
Stored Information

Dear Mr. Zuckerberg:

The State of Mississippi (the "State") is investigating and evaluating Facebook's conduct related to the recently published reports that personal user information from Facebook profiles was provided to third parties without the users' knowledge or consent. The purpose of this investigation is to determine whether there exist any violations of Mississippi law. One of the many potential outcomes of the ongoing investigation could be civil or criminal litigation arising under state law.

As you are aware, parties have a duty to preserve potentially relevant information that may be used as evidence in pending or reasonably foreseeable litigation. Once a party reasonably anticipates litigation, it must suspend its routine document retention/destruction policy and put in place a "litigation hold" to ensure the preservation of relevant documents. It is crucial that Facebook, its employees, and agents ("Facebook") take affirmative steps to preserve both paper documents and electronically stored information that are relevant to this investigation and that are in Facebook's possession, custody or control.

Accordingly, the State formally requests that Facebook take all appropriate steps necessary to preserve all potentially relevant information pertaining to the State's investigation during the time period covering November 2013 through today and going forward. Facebook should not discard documents or electronically stored information that is relevant, nor delete, overwrite, alter, or destroy such materials.

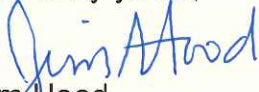
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"Potentially relevant information" includes any and all documents and electronically stored information related to Dr. Aleksandr Kogan and his creation and use of an app called "thisisyourdigitallife" that used Facebook Login to pass data to a company called SCL/Cambridge Analytica. We request that Facebook comply with its legal responsibility to retain all potentially relevant information related to Dr. Kogan's conduct described herein.

In order to comply with this litigation hold request, the State further requests that Facebook take affirmative steps to prevent intentional or inadvertent destruction of all "potentially relevant information".

Thank you for your attention to this matter, and please feel free to contact me should you have any questions related to this litigation hold request.

Sincerely yours,



Jim Hood  
Attorney General