

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

Docket No. 217-2020-CV-212

Casella Waste Systems, Inc.

v.

Jon Swan & Save Forest Lake, et al.

OBJECTION TO MOTION TO COMPEL

Defendant(s) objects to the Plaintiff's Motion to Compel (the "Motion"), filed on April 5, 2022, stating as follows:

1. The discussion concerning the requested discovery has been underway for some time, and counsel for both sides have endeavored to reach agreement on a scope for the request that is reasonable and possible for the Defendants to respond to. While the Motion seems to suggest that the Defendants have been difficult or dilatory regarding this particular unresolved discovery dispute, it is worth noting that of the scores of requests for production and interrogatories that the Plaintiff has served on the Defendants, this is the lone issue that the parties have not been able to resolve through reasonable discussion.¹ At least as of this moment, there is good reason for that.

¹ Regarding the suggestions of delay, both sides in this matter have sought—and received—the respectful agreement of the other side on discovery accommodations, trial and deadline rescheduling, and other matters that New Hampshire counsel usually agree upon in the normal course. It is true that it took some time for Defendants to produce the data sets they did produce (February 18, 2022 disclosures after a November 1, 2021 request for production) but the parties were engaged in a running discussion during that period as to the definition of the demand and, as noted, the Defendants' counsel had a family medical issue. Plaintiff also took 100 or more days responding to February 1, 2021 discovery requests from the Defendants. Suffice it to say that the parties and counsel have conducted their discovery efforts within the norm for New Hampshire practice, with flexible deadlines, patience and good faith efforts to narrow their disputes and obtain discovery that is relevant and necessary.

2. Contrary to portions the narrative described in the Motion, the Defendants have made substantial efforts to (a) provide reasonably responsive internet user data relating to Save Forest Lake’s social media accounts, and (b) narrow the scope of the requests such that they are reasonably calculated to lead to admissible evidence and not overly burdensome. From the start of discovery regarding these issues, Save Forest Lake has pointed out that it has been engaged in a massive public communication effort in opposition to Plaintiff’s proposed landfill project next to pristine Forest Lake in Dalton. That effort has involved thousands—perhaps, at this point, tens of thousands—of communications, posts, and public utterances by the Defendants in strident opposition to the landfill. Of those thousands of communications, the Plaintiff has seized on a cherry-picked handful in order to force the Defendants into court and cause them to spend money defending a defamation claim.

3. To date, the Plaintiff has only provided “categories” of communications that it believes to be defamatory. *See* Motion at Exhibit N (pp. 103-04 of Motion PDF document). It has provided examples of communications it believes fit into these categories, but, to date, has not identified, beyond that, which communications, on what date, it thinks are defamatory. *See, e.g.,* Defendants’ Motion for Summary Judgment (April 14, 2022), Affidavit of John Swan, ¶4 (appending material provided by the Plaintiff in response to Defendants’ Request for Production 1—asking for copies of each statement Plaintiff alleges to be defamatory). This is an important fact, because the user data that the Plaintiff has sought to date has been general user data concerning Defendants’ social media accounts; or, in the alternative, when it has sought data

Defendants take no issue with that process to date, notwithstanding their absolute conviction that this litigation is nothing more than an effort to silence their assertive, and to date successful, political advocacy.

relating to specific posts, it has placed the burden on the Defendants to identify the posts that data should be produced for. *See* Motion at Exhibit E (pp. 43-48 of the Motion PDF document).

4. For example, at Request No. 6, Plaintiff asked for “any and all documents and records that embody or refer to or relate to any and all analytical data for the lifetime of each specific social media or website poste *in which you make a defamatory statement.*” *Id.* at 48. First, placing that discretion on the Defendants is practically calculated to lead to the discovery of nothing, because it is the Defendants’ firm belief, and conviction, that none of the alleged defamatory statements are defamatory. So, left to the Defendants’ discretion, even a good faith litigant, which the Defendants are, will be ill-served in picking and choosing, from amongst thousands of statements, even narrowed by category, those statements that might conceivably be deemed to be defamatory by the Plaintiff.

5. The Defendants, through counsel, asked for precision on this point. On November 30, 2021, the undersigned made the following objections to Attorney Tanafon for the Plaintiff:

With apologies for my delay—I will be objecting to the presumptive language about “defamatory statements” because there aren’t any, but beyond that, we have again an overbreadth problem. Perhaps you could identify the specific accounts that you think contain such statements and we can pull that data. As it is, you’re asking Jon to divine which statements you think are defamatory and produce data from accounts that contain those statements. It’s a circular error. If you have specific accounts (by username/handle) that you are looking for, let me know and we’ll assess how practicable it is to obtain the information in question. I am not going to allow Jon to get immersed in some long fishing expedition that involves extended interactions with your IT people. If he can pull the data simply and easily for the accounts you have named, I don’t see how I can object to that. But as framed these questions place too much discretion on us to come up with which accounts you are looking for—and my answer would have to be that there are no responsive documents because your requests presume defamation that doesn’t exist. Rather than going down that useless sophistry morass, I prefer that you just tell us which accounts you have identified that you want the data for.

Exhibit A, hereto, Email chain of November 30, 2021 to Morgan Tanafon and Brenda Barnard.²

6. Then, by email dated March 21, 2022: “We stand by our previous objection to the request for production relating to Mr. Swan’s/SFL’s social media traffic. It is a classic fishing expedition, it’s unduly burdensome, it’s overbroad, it’s open-ended... I will say that if you have specific posts that you want us to try to obtain viewer data for, that might narrow your request into a reasonable range. General Facebook and social media user data is not relevant to the breadth of exposure of any specific tweet or post.” Motion at Exhibit M (pp. 99 of Motion PDF document).

7. As it stands, the Defendants have been tasked by the Plaintiff’s discovery request with divining which accounts to seek data for, and which posts on those accounts to seek data for. The Defendants reasonable response is none. But even assuming that the Defendants should act in good faith to produce responsive information if they can, generalized user data for a communications project that has unfolded over years, on multiple platforms, with thousands of posts, reposts and comments, is not remotely relevant to the question of how many viewers might have clicked on a *particular post* that the Plaintiff believes to be actionable. All that the Defendants sought was precision. If the Plaintiff had said, for example, “Please provide documents relating to the Save Forest Lake Facebook post dated April 15, 2022 beginning, ‘Whether the town decides...,’” then there would be a clear, identifiable, downloadable data set

² Counsel reiterated this objection later in the thread: “Morgan—I appreciate your response but surely you have identified the specific statements you believe are defamatory—after all, that is an obligation you have to prove your case. If you can tell me which account the statements belong to, I will push for that data, which I think is reasonable to obtain (assuming the categories of information you’re looking for are collectible, for example, with one report as opposed to one report for each category). Surely you have a list of accounts he uses that you want information about?” Exhibit A.

for that post, on that day—a data set that does not require a heavy dose of conjecture and speculation by the Defendants to identify. As it stands, the Plaintiff effectively asks the Defendants to make implicit admissions as to what constitutes a defamatory post by shifting the burden to the Defendants to obtain data relating to “defamatory posts.”

8. To put this into context, data responsive to a general request for user data for Save Forest Lake’s Facebook account might produce a number of users, posts, reach, etc. over the lifetime of the Save Forest Lake Facebook account (but one of potentially others that fall within the ambit of Request No. 1). *E.g.*, Motion at Exhibit E (p. 43 of Motion PDF document). But no one—not the Plaintiff, not the Defendant, not Facebook, can determine from that data how many users saw a particular post. It matters not whether thousands or hundreds of thousands of people have viewed, read and followed Save Forest Lake on Facebook generally. Those figures tell the Court nothing about how many people have seen a given, allegedly defamatory post. By seeking general user data about the social media platforms used by the Defendants for their messaging, the Plaintiff is asking for data that is simply not admissible or relevant. Indeed, to the extent that the Plaintiff wishes to use the manifest success of Defendants’ public information campaign against it by arguing that the overall number of users, likes, shares and reactions to all of the Defendants’ thousands of posts is indicative of how deeply a handful of allegedly defamatory posts might have reached, then that would be unfairly prejudicial in addition to lacking relevancy. For this reason, at minimum, Requests Nos. 1-5, see Motion PDF document at 43-47, are not reasonably calculated to lead to the discovery of admissible evidence.

9. Request No. 6, see Motion PDF document at 48, asks a more appropriate question, but fails to identify *which* posts it wants data for. As the undersigned gently suggested

to counsel for the Plaintiff on March 21, 2022, narrowing the question to a specific set of posts will give the Defendants the scope, definition and refinement they need to obtain the data that Plaintiff is looking for. Anything less requires the Defendants to do guesswork as to which documents might be responsive to Plaintiff's requests.³

10. It is important to note that the Defendants, despite the vagueness and ambiguity of the requests, have endeavored to provide data to the Plaintiffs that might be responsive. See, e.g., Motion at Exhibit K; *id.* at Exhibit C, Motion PDF document at 27-33. Indeed, the Defendants' disclosures on February 18, 2022 provided Facebook data files in their native Excel format—fully searchable by the Plaintiff—with data concerning Lifetime total likes, Daily New Likes, Daily Unlikes, Daily Page Engaged Users, Weekly Page Engaged Users, Daily Like Source, Daily total Frequency Distribution, and much more. See Exhibit B hereto. Exhibit B, 139 pages long, constitutes *one* PDF conversion of *one* Excel profile of Save Forest Lake Facebook data provided to Plaintiff in native format. Defendants produced six such documents. In short, the Defendants have not acted in bad faith or in a dilatory or obfuscatory manner. They have tried, within the boundaryless parameters communicated to them by Plaintiff, to produce reasonable responsive discovery—even if they think it is not relevant, overbroad, and so forth.

³ Plaintiff's suggestion that the set of nine categories of posts that the parties have agreed remain "actionable" at this date provide sufficient definition is wrong. As a matter of law, the Defendants are entitled to know what specific statement is being alleged to be defamatory. Beyond that, the data that Plaintiff is seeking is organized, in part, on the basis of specific online statements in posts with specific date and time stamps. Defendants might have made five hundred different posts or comments concerning, for example, the Plaintiff's efforts to quietly give the Town of Dalton tens of thousands of dollars "no strings attached" from its charitable foundation through back channel negotiations while the Town's land use boards were considering its landfill proposal. See, generally, Motion for Summary Judgment, Memorandum of Law at 6-9. This was an objectively problematic offer by the Plaintiff. Is any allegation in a Facebook post that the Plaintiff's financial offers to the Town were unseemly and possibly corrupt the kind of statement for which data sought by the Plaintiff in its request would be responsive? We do not know. That is why the Defendants have sought clarity from the Plaintiff about specific posts. At minimum, they are entitled to that.

11. Lastly, as the Court is now aware, the Defendants filed a dispositive Motion for Summary Judgment on the remaining categories of statements that the Plaintiff alleges to be defamatory. Briefly summarized, Defendants have argued that the statements Plaintiff alleges to be defamatory are mere opinion based upon fully disclosed public facts, true statements supported by substantial public documents and reporting, and often by the Plaintiff's own public statements and admissions. Plaintiff has managed to decontextualize these statements sufficiently for the Court to have permitted several to withstand the Defendants' prior motion to dismiss—unfortunately. However, the context offered by the weight of the undisputed evidence in the Motion for Summary Judgment reveals these statements, too, to be non-actionable.

12. The Defendants had drafted their Motion for Summary Judgment by February 10, 2022. They sought, through counsel, assent for a longer-than-permitted Memorandum of Law and associated materials due to the voluminous nature of the contextual evidence and the sheer number of statements that had to be addressed. Counsel for the Plaintiff responded with consternation, noting that the Plaintiff would agree to the longer memorandum, but that Defendants should refrain from filing their Motion for Summary Judgment until the parties' discovery disputes were resolved and discovery, including the deposition of Defendant Swan, was complete. Even though the remaining issues were not relevant to the defenses raised by the Motion for Summary Judgment, the undersigned agreed, as a courtesy, to refrain from filing the Motion for Summary Judgment until Mr. Swan's deposition could be taken. The Plaintiff argued that this could not be completed until the electronic data sought in discovery was produced. Plaintiff's Motion followed on April 5, 2022, and Defendants moved for summary judgment on April 14, 2022.

13. This latter dispute, and the sequence and timing of both motions, is important for the disposition of the present Motion to Compel. Defendants argued to Plaintiff's counsel the following:

I see a larger issue here. Your requests [regarding social media data] go to damages, i.e., the extent/exposure of any given defamatory statement. Notwithstanding the respectful and collaborative approach we have taken to the issues in this matter—which I appreciate and which, I hope you agree, has been reciprocal—you know very well how dimly I view this case from a legal perspective. I think it is a travesty that it has gone on as long as it has. If there is a better example of using the judicial process to punish an activist for speaking out about a project, I haven't seen it. My summary judgment motion will, I believe, dispose of the remaining outstanding claims/statements as a legal matter. It would only be if the summary judgment motion fails to do so that your damages evidence would be relevant—and there would be ample time before trial to produce the relevant data.

Therefore, I propose that you take your deposition of my client within the next two weeks on whatever issues you feel are appropriate, and that I file my motion for summary judgment immediately thereafter. I would be willing to suspend the deposition to a later date to address damages discovery questions you might have if this goes past the summary judgment stage.

Motion, Exhibit M, Motion PDF document at 99.

14. The Plaintiff has made vague, ambiguous, overbroad requests that are not reasonably calculated to lead to the discovery of admissible data. They will require the Defendants to spend hours upon hours downloading tools they do not already use, extracting data sets for a variety of date ranges, and speculating about what platforms contain which defamatory statements—only to produce data that is completely irrelevant to the question of how many users saw a given defamatory statement. The Defendants, while providing what they reasonably could, have asked the Plaintiff to narrow that request to identify the specific posts for which it wants relevant data. They stand ready to respond. But until the Plaintiff does so, its requests are impossible to respond to reasonably.

15. The Court should deny the Motion. But at a minimum, if the Court grants the Motion, it should require the Plaintiff to identify which social media posts it wants data for. This will enable the Plaintiff to obtain data with precision and not waste time wondering which of its posts it should produce data for. Furthermore, as noted, the request goes to an issue that may not be necessary to resolve given the pending summary judgment motion. Even if the Court does not dispose of all the statements on summary judgment—though it should—at a minimum, the disposition of the summary judgment motion will narrow the number of actionable social media posts, and the number of posts for which the Defendants have to locate data. Even if the Court grants the present Motion to Compel, therefore, waiting to know which categories of statements remain actionable before seeking user data relating to allegedly defamatory statements would be the most efficient use of the Court’s and the parties’ resources.

WHEREFORE, Defendants request that the Court:

- A) Deny the Motion for Summary Judgment; or
- B) Grant the Motion⁴ on the conditions that (a) the Plaintiff identify the specific posts for which it wants user data; and (b) that the Plaintiff serve its updated request for production after disposition of the summary judgment motion; and
- C) Grant such other and further relief as the Court deems just and equitable.

Respectfully Submitted,

SAVE FOREST LAKE & JON SWAN

By their Attorneys,

ORR & RENO, P.A.

⁴ Plaintiff does not ask for, and should not be granted, attorneys’ fees relating to this Motion. Defendants have attempted to respond to the Plaintiff’s requests in good faith and the parties have a legitimate disagreement as to the relevance, scope, and definition of the documents sought by the Plaintiff.

Date: April 15, 2022

By: /s/ Jeremy D. Eggleton
Jeremy D. Eggleton, Esq. (N.H. Bar No. 18170)
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CERTIFICATE OF SERVICE

I, Jeremy D. Eggleton, do hereby certify that a copy of the foregoing was forwarded, this day, to counsel of record, via the Court's electronic service system.

/s/ Jeremy D. Eggleton

3535542_1

EXHIBIT A

From: [Eggleton, Jeremy D.](#)
To: [Morgan G. Tanafon](#)
Subject: RE: Casella Waste Systems, Inc. v. Jon Swan fka Jon Alvarez, et al. [IWOV-iManage.FID487758]
Date: Tuesday, November 30, 2021 9:55:51 AM

Morgan—I appreciate your response but surely you have identified the specific statements you believe are defamatory—after all, that is an obligation you have to prove your case. If you can tell me which account the statements belong to, I will push for that data, which I think is reasonable to obtain (assuming the categories of information you’re looking for are collectible, for example, with one report as opposed to one report for each category). Surely you have a list of accounts he uses that you want information about?

From: Morgan G. Tanafon <TanafonM@cwbp.com>
Sent: Tuesday, November 30, 2021 9:53 AM
To: Eggleton, Jeremy D. <JEggleton@orr-reno.com>
Subject: RE: Casella Waste Systems, Inc. v. Jon Swan fka Jon Alvarez, et al. [IWOV-iManage.FID487758]

Jeremy,

I’m somewhat confused – our second set of discovery requests defines the data we’re looking for with specificity. Retrieving the data requires no speculation and little discretion on Mr. Swan’s part. You can certainly object to us using the term “defamatory statement,” but that’s a defined term in the requests (#4 under definitions) which is used throughout the requests in order to forestall any ambiguity in which accounts we are looking for data on. The list of actionable statements – as defined by the court – detailed in definition 4 is materially the same as we already agreed upon in our earlier meet and confers, with I think the addition of the “weaponizing the legal system” statement.

While I understand overbreadth concerns, I have a hard time seeing our listing social media accounts we’re looking for analytical data on as a solution. It is because of overbreadth concerns that we so carefully defined what data we’re requesting. Our client does not possess the information and access Mr. Swan has to his accounts. Given how prolific a social media user he is, even identifying each place he’s posted his actionable statements is a challenge. Mr. Swan simply has to refer to the list of statements provided, pull the analytical data for each account that has posted one or more of the statements, and indicate the statement(s) made on that account. If he is unsure of how to access the analytical data for any platform(s), we can advise.

Regards,

Morgan

Morgan G. Tanafon
Associate
CLEVELAND, WATERS AND BASS, P.A.
Two Capital Plaza, 5th Floor

P.O. Box 1137
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Tel: (603) 224-7761 / (800) 370-7761, ext. 1034
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Email: tanafonm@cwbp.com

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From: Eggleton, Jeremy D. <JEggleton@orr-reno.com>
Sent: Tuesday, November 30, 2021 8:42 AM
To: Brenda Barnard <barnardb@cwbp.com>
Cc: Morgan G. Tanafon <TanafonM@cwbp.com>
Subject: RE: Casella Waste Systems, Inc. v. Jon Swan fka Jon Alvarez, et al. [IWOV-iManage.FID487758]

Morgan,

With apologies for my delay—I will be objecting to the presumptive language about “defamatory statements” because there aren’t any, but beyond that, we have again an overbreadth problem. Perhaps you could identify the specific accounts that you think contain such statements and we can pull that data. As it is, you’re asking Jon to divine which statements you think are defamatory and produce data from accounts that contain those statements. It’s a circular error. If you have specific accounts (by username/handle) that you are looking for, let me know and we’ll assess how practicable it is to obtain the information in question. I am not going to allow Jon to get immersed in some long fishing expedition that involves extended interactions with your IT people. If he can pull the data simply and easily for the accounts you have named, I don’t see how I can object to that. But as framed these questions place too much discretion on us to come up with which accounts you are looking for—and my answer would have to be that there are no responsive documents because your requests presume defamation that doesn’t exist. Rather than going down that useless sophistry morass, I prefer that you just tell us which accounts you have identified that you want the data for.

JE

From: Brenda Barnard <barnardb@cwbp.com>
Sent: Monday, November 1, 2021 4:46 PM
To: Eggleton, Jeremy D. <JEggleton@orr-reno.com>
Cc: Morgan G. Tanafon <TanafonM@cwbp.com>

Subject: Casella Waste Systems, Inc. v. Jon Swan fka Jon Alvarez, et al.

Good afternoon,

Attached is a second set of requests for production of documents propounded upon Jon Swan.

Thank you.

Brenda M. Barnard

CLEVELAND, WATERS AND BASS, P.A.

Two Capital Plaza, 5th Floor

P.O. Box 1137

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EXHIBIT B

Date**Lifetime Total Likes****Daily New Likes**

Lifetime: The total number of p Daily: The number of new peop

10/1/21	67
10/2/21	67
10/3/21	67
10/4/21	67
10/5/21	67
10/6/21	67
10/7/21	66
10/8/21	66
10/9/21	66
10/10/21	66
10/11/21	66
10/12/21	66
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12/22/21	69
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12/25/21	69

12/26/21	69
12/27/21	69
12/28/21	72
12/29/21	69
12/30/21	69
12/31/21	69

Daily Unlikes

Daily Page Engaged Users

Weekly Page Engaged Users

Daily: The number of Unlikes of Daily: The number of people who Weekly: The number of people

25
10
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28 Days Page Engaged User: Daily Total Reach**Weekly Total Reach**

28 Days: The number of people Daily: The number of people w/ Weekly: The number of people

25	2	198
25	3	82
25	2	59
25	1	34
25	1	27
25	1	15
25	4	10
25		8
25		6
25	1	6
25		5
25	1	6
25	3	8
25	2	7
25	1	7
25	1	7
25		6
25		6
27	3	7
27		5
27	1	4
28	2	5
17	13	17
14	5	22
11	3	25
12	10	30
11	6	33
10	5	36
10	2	36
10		28
10	5	28
10	3	25
10	1	18
10	1	14
11	2	12
11	1	11
11		11
11		6
11		4
11		3
12	3	5
12	1	4

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28 Days Total Reach**Daily Organic Reach****Weekly Organic Reach**

28 Days: The number of people Daily: The number of people w/ Weekly: The number of people

203	2	198
205	3	82
206	2	59
206	1	34
205	1	27
205		15
206	4	10
206		8
205		6
206	1	6
206		5
206	1	6
206	3	8
206	2	7
206		7
206	1	7
206		6
205		6
206	3	7
206		5
205		4
205	2	5
94	13	17
78	5	22
58	3	25
59	10	30
51	6	33
48	5	36
48	1	36
46		28
47	5	28
46	3	25
47	1	18
47	1	14
47	2	12
47		11
47		11
46		6
46		4
45		3
45	3	5
45	1	4

45		4
46	1	5
46		5
46	1	5
46	6	11
46	1	9
46		8
46		8
38		7
35		7
32		7
26	1	2
23	1	2
20		2
19		2
19		2
16		2
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16	6	7
17	1	8
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15		2
15	1	2
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28 Days Organic Reach

Daily Paid Reach

Weekly Paid Reach

28 Days: The number of people Daily: The number of people w/ Weekly: The number of people

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28 Days Paid Reach**Daily Viral Reach****Weekly Viral Reach**

28 Days: The number of people Daily: The number of people w Weekly: The number of people

2	192
3	77
2	56
1	32
1	26
	14
2	9
	7
	5
1	4
	3
1	4
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1	1
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1	2
9	11
4	15
3	18
6	23
4	26
5	29
1	29
	22
3	21
3	18
1	15
	11
2	9
	8
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28 Days Viral Reach**Daily Total Impressions****Weekly Total Impressions**

28 Days: The number of people reached
Daily: The number of times any one person is reached
Weekly: The number of times a person is reached

192	2	257
194	3	112
195	2	86
195	1	40
195	2	34
195	2	20
196	7	19
196		17
196		14
197	1	13
197		12
197	1	11
197	3	12
197	4	9
197	1	10
197	3	13
197		12
197		12
198	57	68
198		65
198	1	62
198	55	116
87	15	128
71	5	133
51	3	136
51	10	89
42	11	100
39	5	104
39	2	51
37		36
37	12	43
36	5	45
37	1	36
37	3	28
37	2	25
37	1	24
37		24
36		12
36		7
35		6
36	11	14
36	6	18

36		17
37	1	18
37		18
37	2	20
36	7	27
36	3	19
36		13
35		13
28		12
25		12
22		10
18	22	25
14	3	25
11		25
10		25
10		25
8		25
6		25
5		3
5	1	1
3	6	7
3	8	15
3	28	43
3		43
3		43
3	5	48
2	1	48
2	4	46
2	1	39
2	1	12
2		12
2	3	15
1	1	11
1	3	13
1	1	10
1		9
1		8
1		8
1		5
1		4
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28 Days Total Impressions Daily Organic impressions Weekly Organic impressions

28 Days: The number of times ; Daily: The number of times any Weekly: The number of times a

280	2	246
283	3	105
285	2	79
286	1	38
284	1	32
284		17
289	6	15
287		13
286		10
287	1	9
284		8
284	1	8
287	3	11
291	3	8
292		8
295	2	10
295		9
294		9
347	53	61
347		58
345		55
400	52	107
267	14	119
244	5	124
200	3	127
202	10	84
197	9	93
194	5	98
194	1	47
191		33
201	11	39
205	5	41
204	1	32
205	2	25
200	2	22
201		21
201		21
200		10
200		5
199		4
207	9	11
209	5	14

208		14
206	1	15
206		15
208	1	16
158	6	22
161	2	15
160		10
105		10
90		9
85		9
82		8
94	21	23
86	2	23
81		23
79		23
79		23
67		23
62		23
61		2
59		
63	4	4
70	7	11
98	27	38
98		38
98		38
103	3	41
93		41
91	2	39
92		32
92	1	6
92		6
93	2	8
87		5
87	2	7
88		5
88		5
88		4
88		4
88		2
66		2
63		
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28 Days Organic impressions **Daily Paid Impressions** **Weekly Paid Impressions**

28 Days: The number of times ; Daily: The number of times any Weekly: The number of times a

- 259
- 262
- 264
- 265
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- 263
- 268
- 267
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- 265
- 266
- 269
- 272
- 272
- 274
- 274
- 273
- 324
- 324
- 322
- 374
- 244
- 221
- 182
- 185
- 179
- 176
- 175
- 172
- 181
- 185
- 185
- 187
- 183
- 183
- 183
- 182
- 182
- 181
- 187
- 189

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28 Days Paid Impressions Daily Viral impressions Weekly Viral impressions

28 days: The number of times a Daily: The number of times any Weekly: The number of times a

2	213
3	85
2	61
1	35
1	30
	16
2	11
	9
	6
1	5
	4
1	4
	4
	2
	2
	2
	1
	1
1	1
	1
	1
1	2
9	11
4	15
3	18
6	23
4	27
5	32
1	32
	23
5	24
4	25
1	20
	16
2	13
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28 Days Viral impressions Daily Logged-in Page Views Weekly Logged-in Page View

28 Days: The number of times ; Daily: Page Views from users ; Weekly: Page Views from users

213		11
216		7
218		7
219		2
220	1	2
220	2	3
222	1	4
222		4
222		4
223		4
223		4
224		3
224		1
224	1	1
224	1	2
224	1	3
224		3
224		3
225	4	7
225		7
225	1	7
226	3	9
104	1	9
82		9
58		9
58		5
48	2	7
46		6
45	1	4
42		3
45	1	4
48		4
48		4
48	1	3
48		3
48	1	3
48		3
47		2
47		2
46		2
47	2	3
47	1	4

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Daily Logged-in Page Views Weekly Logged-in Page View Daily Reach Of Page Posts

Daily: Page Views from users | Weekly: Page Views from users | Daily: The number of people wh

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	3	2
	2	1
1	1	1
1	1	
1	1	4
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	1	1
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	1	1
	1	3
1	1	2
1	1	
1	2	1
	2	
	2	
3	4	3
	4	
1	4	
2	5	2
1	5	13
	5	5
	5	3
	3	10
1	3	6
	3	5
1	2	1
	1	
1	2	5
	2	3
	2	1
1	2	1
	2	2
1	2	
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2	2	3
1	3	1

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Weekly Reach Of Page Posts 28 Days Reach Of Page Post: Daily Organic Reach of Page

Weekly: The number of people 28 Days: The number of people Daily: The number of people w/

198	203	2
82	205	3
59	206	2
34	206	1
27	205	1
15	205	
10	206	4
8	206	
6	205	
6	206	1
5	206	
6	206	1
8	206	3
7	206	2
7	206	
7	206	1
6	206	
6	205	
7	206	3
5	206	
4	205	
5	205	2
17	94	13
22	78	5
25	58	3
30	59	10
33	51	6
36	48	5
36	48	1
28	46	
28	47	5
25	46	3
18	47	1
14	47	1
12	47	2
11	47	
11	47	
6	46	
4	46	
3	45	
5	45	3
4	45	1

4	45	
5	46	1
5	46	
5	46	1
11	46	6
9	46	1
8	46	
8	46	
7	38	
7	35	
7	32	
2	26	1
2	23	1
2	20	
2	19	
2	19	
2	16	
2	14	
1	13	
	13	
1	12	1
7	15	6
8	16	1
8	16	
8	16	
8	16	
9	16	1
9	15	
8	14	1
2	14	
2	14	1
2	14	
2	14	1
2	11	
2	11	1
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Weekly Organic Reach of Page | 28 Days Organic Reach of Page | Daily Paid Reach of Page post

Weekly: The number of people who viewed the page | 28 Days: The number of people who viewed the page | Daily: The number of people who viewed the page

198	203
82	205
59	206
34	206
27	205
15	205
10	206
8	206
6	205
6	206
5	206
6	206
8	206
7	206
7	206
7	206
6	206
6	205
7	206
5	206
4	205
5	205
17	94
22	78
25	58
30	59
33	51
36	48
36	48
28	46
28	47
25	46
18	47
14	47
12	47
11	47
11	47
6	46
4	46
3	45
5	45
4	45

4	45
5	46
5	46
5	46
11	46
9	46
8	46
8	46
7	38
7	35
7	32
2	26
2	23
2	20
2	19
2	19
2	16
2	14
1	13
	13
1	12
7	15
8	16
8	16
8	16
8	16
9	16
9	15
8	14
2	14
2	14
2	14
2	14
2	14
2	11
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2	11
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Weekly Paid Reach of Page | 28 Days Paid Reach of Page Daily Viral Reach Of Page Po

Weekly: The number of people 28 Days: The number of people Daily: The number of people wt

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Weekly Viral Reach Of Page 28 Days Viral Reach Of Page Daily Total Impressions of y

Weekly: The number of people 28 Days: The number of people Daily: The number of times you

192	192	2
77	194	3
56	195	2
32	195	1
26	195	1
14	195	
9	196	6
7	196	
5	196	
4	197	1
3	197	
4	197	1
4	197	3
2	197	3
2	197	
2	197	2
1	197	
1	197	
1	198	53
1	198	
1	198	
2	198	52
11	87	14
15	71	5
18	51	3
23	51	10
26	42	9
29	39	5
29	39	1
22	37	
21	37	11
18	36	5
15	37	1
11	37	2
9	37	2
8	37	
8	37	
5	36	
3	36	
2	35	
3	36	9
1	36	5

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Weekly Total Impressions of 28 Days Total Impressions of Daily Organic impressions of

Weekly: The number of times y 28 Days: The number of times ' Daily: The number of times you

246	259	2
105	262	3
79	264	2
38	265	1
32	264	1
17	263	
15	268	6
13	267	
10	266	
9	267	1
8	265	
8	266	1
11	269	3
8	272	3
8	272	
10	274	2
9	274	
9	273	
61	324	53
58	324	
55	322	
107	374	52
119	244	14
124	221	5
127	182	3
84	185	10
93	179	9
98	176	5
47	175	1
33	172	
39	181	11
41	185	5
32	185	1
25	187	2
22	183	2
21	183	
21	183	
10	182	
5	182	
4	181	
11	187	9
14	189	5

14	189	
15	188	1
15	188	
16	189	1
22	142	6
15	144	2
10	144	
10	92	
9	78	
9	73	
8	70	
23	81	21
23	74	2
23	69	
23	68	
23	68	
23	57	
23	52	
2	51	
	49	
4	51	4
11	58	7
38	85	27
38	85	
38	85	
41	88	3
41	79	
39	76	2
32	76	
6	76	1
6	76	
8	77	2
5	71	
7	71	2
5	71	
5	71	
4	71	
4	71	
2	71	
2	50	
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Weekly Organic impressions 28 Days Organic impression: Daily Paid impressions of yo

Weekly: The number of times y 28 Days: The number of times ' Daily: The number of times you

246	259
105	262
79	264
38	265
32	264
17	263
15	268
13	267
10	266
9	267
8	265
8	266
11	269
8	272
8	272
10	274
9	274
9	273
61	324
58	324
55	322
107	374
119	244
124	221
127	182
84	185
93	179
98	176
47	175
33	172
39	181
41	185
32	185
25	187
22	183
21	183
21	183
10	182
5	182
4	181
11	187
14	189

14	189
15	188
15	188
16	189
22	142
15	144
10	144
10	92
9	78
9	73
8	70
23	81
23	74
23	69
23	68
23	68
23	57
23	52
2	51
	49
4	51
11	58
38	85
38	85
38	85
41	88
41	79
39	76
32	76
6	76
6	76
8	77
5	71
7	71
5	71
5	71
4	71
4	71
2	71
2	50
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9	53
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Weekly Paid impressions of 28 Days Paid impressions of Daily Viral Impressions Of Y

Weekly: The number of times y 28 Days: The number of times ' Daily: The number of times you

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Weekly Viral Impressions O 28 Days Viral Impressions O Daily Total Consumers

Weekly: The number of times y 28 Days: The number of times ' Daily: The number of people wt

213	213	
85	216	
61	218	
35	219	
30	220	
16	220	
11	222	
9	222	
6	222	
5	223	
4	223	
4	224	
4	224	
2	224	
2	224	
2	224	
1	224	
1	224	
1	225	2
1	225	
1	225	
2	226	1
11	104	2
15	82	
18	58	
23	58	1
27	48	1
32	46	
32	45	
23	42	
24	45	
25	48	
20	48	
16	48	
13	48	1
12	48	
12	48	
7	47	
3	47	
2	46	
3	47	
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Weekly Negative Feedback **28 Days Negative Feedback** **Daily Negative Feedback Fro**
Weekly: The number of people 28 Days: The number of people Daily: The number of times pec

Weekly Negative Feedback F 28 Days Negative Feedback Daily Total Check-Ins

Weekly: The number of times p 28 Days: The number of times | Daily: Total check-ins at your P

Weekly Total Check-Ins

28 Days Total Check-Ins

Daily Total Check-Ins

Weekly: Total check-ins at your P 28 Days: Total check-ins at your P Daily: Total check-ins at your P

Weekly Total Check-Ins **28 Days Total Check-Ins** **Daily Total Check-Ins Using**
Weekly: Total check-ins at your P 28 Days: Total check-ins at your P Daily: Total check-ins at your P

Weekly Total Check-Ins Using 28 Days Total Check-Ins Using Daily Total Check-Ins Using
Weekly: Total check-ins at your 28 Days: Total check-ins at your Daily: Total check-ins at your P

Weekly Total Check-Ins Usin 28 Days Total Check-Ins Usi Daily Total Organic Views

Weekly: Total check-ins at you | 28 Days: Total check-ins at you | Daily: Number of times a video

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Weekly Total Promoted View 28 Days Total Promoted View Daily Total Organic 30-Second
Weekly: Number of times a pro 28 Days: Number of times a pr Daily: Number of times the vid

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Weekly Paid 30-Second View 28 Days Paid 30-Second View Daily Total Video Views

Weekly: Number of times page' 28 Days: Number of times page Daily: Total number of times vi

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Weekly Total Clicked Views 28 Days Total Clicked Views Daily Video Repeats

Weekly: Number of times a vid 28 Days: Number of times a vic Daily: Number of times the vid

Weekly Video Repeats

28 Days Video Repeats

Daily Total Unique Video Views

Weekly: Number of times the video is viewed within a 7-day period
28 Days: Number of times the video is viewed within a 28-day period
Daily: Metric showing the total number of unique views per day

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Weekly Total 30-Second View 28 Days Total 30-Second View Daily Auto-Played 30-Second View
 Weekly: Total number of times 28 Days: Total number of times Daily: Number of times your pa

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Weekly Total Clicked 30-Sec 28 Days Total Clicked 30-Sec Daily Total 30-Second Repea
Weekly: Number of times a vid 28 Days: Number of times a vic Daily: Number of times a video

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Weekly Total: total action co **Daily Total get direction clic** **Weekly Total get direction cl**
Weekly: The number of clicks o Daily: Total get direction click c Weekly: Total get direction clic

Daily Total get direction clic Weekly Total get direction c Daily Total phone calls click
Daily: Total get direction click c Weekly: Total get direction clic Daily: Total phone calls click cc

Weekly Total phone calls click Daily Total phone calls click Weekly Total phone calls click
Weekly: Total phone calls click Daily: Total phone calls click cc Weekly: Total phone calls click

Daily Total website click cou Weekly Total website click c Daily Total website click cou
Daily: Total website click count Weekly: Total website click cou Daily: Total website click count

Weekly Total website click count per Page

Weekly: Total website click count per Page (Unique Users)