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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION THIS DOCUMENT RELATES TO: ALL ACTIONS	MDL NO. 3047 Civil Case No. 4:22-md-03047-YGR: Honorable Yvonne Gonzalez Rogers META DEFENDANTS' THIRD SUPPLEMENTAL RESPONSES AND OBJECTIONS TO PLAINTIFFS' SECOND INTERROGATORY
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Defendants Meta Platforms, Inc., Facebook Payments, Inc., Siculus, Inc., Facebook Operations, LLC, and Instagram, LLC, (collectively, “Defendants” or “Meta”), by and through their attorneys, Covington & Burling, LLP, submit their third supplemental responses and objections to Plaintiffs’ Interrogatory No. 2 (“Interrogatory”) served on May 16, 2024. Meta’s responses to the Interrogatory are made to the best of its current knowledge, information, and belief. Meta reserves the right to supplement or amend any of its responses should future investigation indicate that such supplementation or amendment is necessary.

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including, for example, liking a particular piece of content. Prediction models utilize input signals as inputs to calculate predictions.

The Appendix includes information about signals used by six of Meta's ranking and recommendation systems. These systems are (1) Facebook Feed, (2) Facebook In-Feed Recommendations, (3) Facebook Pages You May Like, (4) Facebook Suggested Groups, (5) Instagram In-Feed Recommendations, and (6) Instagram Reels. These systems are involved in ranking or recommending content to users.

Each section of the Appendix to this response includes information about certain predictions, and for each such prediction, certain input signals that inform those predictions. For the purposes of this Interrogatory, we provide, where applicable, ten examples of predictions that influence a system's final-stage ranking and recommendation of content to users and five examples of input signals for each such prediction. To the extent the information could be located following a reasonable investigation to date, for each such prediction and input signal listed, Meta provides the following information: name of the signal, alphanumeric ID of the signal, description of the signal, and the name of the team at Meta that maintains the signal. In addition, regarding the weighting of each system's predictions, Meta provides a folder path to the system's value model in Meta's source code.

III. Generators²

Meta's First Supplemental Response ("First Supplement") to this Interrogatory discussed subsystems called "generators." Some of Meta's systems use generators during an early stage of

² The information provided in this section is subject to the limitations regarding, among other things, reliability, completeness, temporality, and geographic scope as stated in Section I of this Response.

*HIGHLY CONFIDENTIAL (COMPETITOR)***O. Instagram Search**²²**1. Recommender: Search Typeahead**

Code Path to Final-Stage-Ranking Value
Model:

N/A

Approximate count of the number of
predictions not listed below:

0

Identified Predictions Used in this System					
	Prediction Name		Model ID	Team	Plain-Language Description
	Accounts				How likely the user is to click an account that appears after the user starts typing in the search bar, and takes an additional action such as following the account or clicking to like a post
		Identified Input Signals			
			Input Name	Feature ID	Plain-Language Description
				The user's Instagram social graph and account owner's Instagram social graph	

²² The information provided in this section is subject to the limitations regarding, among other things, reliability, completeness, temporality, and geographic scope as stated in Section I of this Response ("Limitations Regarding, Among Other Things, Reliability, Completeness, Temporality, and Geographic Scope").

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					How many times the user has viewed the account's story
					How many times the user has visited the account's profile
					The similarity between the words used in the user's search and those in the account's username or profile name
	Prediction Name		Model ID	Team	Plain-Language Description
	Keywords				How likely the user is to click a suggested keyword that appears after the user starts typing in the search bar, and takes an additional action such as saving a post or following an account
		Identified Input Signals			
			Input Name	Feature ID	Plain-Language Description
					How many times the account has been clicked and subsequently acted upon, compared to the number of times those actions have been taken on all accounts by people performing the same search globally, in the user's country, region, and city
					How many times a search result has been clicked after clicking on the suggested keyword
					The similarity between the words used in the user's search and those in the suggested keyword, including exact match

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