

Exhibit 26

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Facebook, Inc.; Facebook Holdings, LLC; Facebook
Operations, LLC; Meta Payments, Inc.;
Facebook Technologies, LLC; Instagram, LLC;
and Siculus, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**META DEFENDANTS' RESPONSES AND
OBJECTIONS TO PLAINTIFFS' RULE
30(B)(6) WRITTEN QUESTIONS TO META
DEFENDANTS META PLATFORMS, INC.;
FACEBOOK PAYMENTS, INC.; SICULUS,
INC.; FACEBOOK OPERATIONS, LLC;
AND INSTAGRAM, LLC ON TOPICS 3-6**

Pursuant to Rules 30 and 31 of the Federal Rules of Civil Procedure, Defendants Meta Platforms, Inc. ("Meta Platforms"); Facebook Payments, Inc. ("Facebook Payments"); Siculus, Inc. ("Siculus"); Facebook Operations, LLC ("Facebook Operations"); and Instagram, LLC ("Instagram, LLC")

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1 intellectual property; Meta Payments, Inc. is a U.S. regulated Money Transmitter License licensee active
 2 in the payment processing space; Siculus and Facebook Operations each operate a data center.

ORIGINAL QUESTION NO. 47:

4 Please identify which Meta-Affiliated Entity owns the AI model(s) that curate(s) the
 5 recommendations on the Facebook or Instagram platforms.

OBJECTIONS TO ORIGINAL QUESTION NO. 47:

6 Meta objects to this question because it is not stated with reasonable particularity and because the
 7 terms “owns,” “AI model(s),” “curate(s),” and “recommendations” are vague and ambiguous.

REVISED QUESTION NO. 47:

9 Please identify all AI models used on the Facebook and Instagram platforms and which Meta-
 10 Affiliated Entity owns the identified AI model(s).

RESPONSES AND OBJECTIONS TO QUESTION NO. 47:

12 Meta objects to this question on the grounds set forth in its general objections, incorporated by
 13 reference herein. Meta further objects to this question because it is not stated with reasonable particularity
 14 and because the terms “AI models,” “used,” and “owns” are vague and ambiguous. Meta further objects
 15 that this question is in whole or part beyond the scope of Topics 3-6. Meta further objects to this question
 16 because the request to identify “all AI models” is overbroad, unduly burdensome, and infeasible for a
 17 witness to answer. Subject to, and without waiving, those objections, Meta responds as follows:

18 Meta Platforms, Inc. develops the models that rank and recommend content on Facebook and
 19 Instagram.

ORIGINAL QUESTION NO. 48:

21 Please identify all entities within the Facebook, Inc. or Meta corporate structure that have played,
 22 or currently play, a role in developing and operating Instagram. For each entity, please: a. Describe the
 23 role or roles that the entity played in developing and operating Instagram; and b. Estimate the time period
 or periods that the entity played the role(s) described.

OBJECTIONS TO ORIGINAL QUESTION NO. 48:

24 Meta objects to this question because it is not stated with reasonable particularity and because the
 25 phrase “a role in developing and operating Instagram” is vague, ambiguous, and overbroad. Meta further
 26 objects because the request to identify “the role or roles” played is overbroad.

REVISED QUESTION NO. 48:

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Identify the Meta-Affiliated Entity or Entities currently responsible for the development and operations of Instagram. Identify any predecessor entity or entities previously responsible for the development and operations for Instagram and the relevant time frame for each entity.

RESPONSES AND OBJECTIONS TO QUESTION NO. 48:

Meta objects to this question on the grounds set forth in its general objections, incorporated by reference herein. Meta further objects to this question because it is not stated with reasonable particularity and because the phrase “development and operations” is vague and ambiguous. Meta further objects that this question is in whole or part beyond the scope of Topics 3-6. Meta further objects to this question because the request for information about “development and operations” that are not relevant to this case is overbroad, unduly burdensome, and infeasible for a witness to answer. Subject to, and without waiving, those objections, Meta responds as follows:

Meta Platforms, Inc. is responsible for the development and operation of Instagram. As reflected in the response to Question 46, Instagram, LLC, holds certain Instagram intellectual property; Meta Payments, Inc. (f/k/a Facebook Payments, Inc.) is a U.S. regulated Money Transmitter License licensee active in the payment processing space; Siculus and Facebook Operations each operate a data center.

ORIGINAL QUESTION NO. 49:

Please identify all entities within the Facebook, Inc. or Meta corporate structure that have had responsibility for user safety and well-being for Instagram. For each entity, please: a. Describe what role or roles that the entity played in monitoring the safety of Instagram; and b. Estimate the time period or periods that the entity played the role(s) described.

OBJECTIONS TO ORIGINAL QUESTION NO. 49:

Meta objects to this question because it is not stated with reasonable particularity and because the phrases “responsibility for user safety and well-being for Instagram” and “monitoring the safety of Instagram” are vague, ambiguous, and overbroad. Meta further objects because the request to identify “the role or roles” played is overbroad.

REVISED QUESTION NO. 49:

Please describe all current and historic actions taken by Meta employees or other Meta-Affiliated Entity to protect the safety and well-being of Instagram users. Identify the person(s) or Meta-Affiliated Entity or Entities responsible for undertaking such actions and the relevant time period when the Meta-Affiliated Entity took such actions.

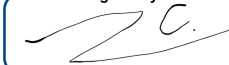
RESPONSES AND OBJECTIONS TO QUESTION NO. 49:

DECLARATION

I have read the answers to this Deposition on Written Questions and the same is true and accurate.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 25, 2024

DocuSigned by:
By: 
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Nicole Lopez