

EXHIBIT 5

[Submitting Counsel on Signature Page]

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

v.

Meta Platforms, Inc., Instagram, LLC, Meta
Payments, Inc., Meta Platforms Technologies,
LLC

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

THIS DOCUMENT RELATES TO:

4:23-cv-05448, 4:22-md-03047-YGR.

MDL No. 3047

Case Nos.: 4:23-cv-05448-YGR
4:22-md-03047-YGR

**STATE ATTORNEYS GENERAL'S
FOURTH SUPPLEMENTAL RESPONSE
TO DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF
INTERROGATORIES**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiffs the People of the State of California; State of Colorado, *ex rel.* Philip J. Weiser, Attorney General; State of Connecticut; State of Delaware, *ex rel.* Kathleen Jennings, Attorney General of the State of Delaware; the People of the State of Illinois; State of Indiana; State of Kansas, *ex rel.* Kris W. Kobach, Attorney General; the Commonwealth of Kentucky; State of Louisiana; State of Minnesota, by its Attorney General, State of Nebraska *ex rel.* Michael T. Hilgers, Attorney General; Matthew J. Platkin, Attorney General for the State of New Jersey, and Elizabeth M. Harris, Director of the New Jersey Division of Consumer Affairs; the People of the State of New York, by Letitia James, Attorney General of the State of New York; State of North Carolina, *ex rel.* Jeff Jackson, Attorney General; Commonwealth of Pennsylvania by Attorney General David W. Sunday, Jr.; State of South Carolina, *ex rel.* Alan M. Wilson, in his official capacity as Attorney General of the State of South Carolina; Commonwealth of Virginia, *ex rel.* Jason S. Miyares, Attorney General; and State of Wisconsin (collectively referenced in this document as the “State AGs”), hereby submit their supplemental responses and objections to Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., and Meta Platforms Technologies, LLC’s (collectively, “Meta” or “Defendants”) First Set of Interrogatories, dated May 3, 2024.

PRELIMINARY STATEMENT

The following supplemental responses are based only on information presently available to the State AGs. These written responses are made without prejudice, and the State AGs reserve all rights to modify, amend, or add to these responses and objections at any time.

The responses that follow are based upon the State AGs’ understanding of the reasonable meaning of Defendants’ Interrogatories and in a good-faith effort to comply with the law. Moreover, while the State AGs may not have direct knowledge or possession of the facts, Documents, and other matters referenced in the responses below, the State AGs have fulfilled their obligation to provide answers based upon information that was reasonably available to the State AGs at the time of the supplemental response. The State AGs reserve the right to refer to, conduct discovery with reference to, or offer into evidence at any time, including trial, any and all facts, Documents, and other things that are

not presently known or available to the State AGs, or have not yet been reviewed or discovered by the State AGs, but which may be learned at some time in the future notwithstanding these supplemental responses. Discovery, investigation, research, and analysis are ongoing and may disclose additional facts, add meaning to known facts, establish new legal contentions, or lead to additions, variations, or changes to these supplemental responses.

Finally, the below supplemental responses are subject to change depending on the outcome of future Court rulings bearing on discovery. The State AGs read these Interrogatories as specifically seeking information maintained by the State AGs, and responses to the Interrogatories are made on behalf of each state attorney general office's investigative/enforcement teams, not on behalf of state agencies or any other entity of state government. To the extent these Interrogatories seek information that is in the possession, custody, or control of state agencies or any other entity of state government, the State AGs reassert their objection that such information is not in the possession, custody, control of the State AGs.

FIRST SET OF INTERROGATORIES

Interrogatory No. 3:

Identify and describe each express and implied misrepresentation and omission relating to Defendants' Platforms for which Plaintiff seeks relief.

State AGs' Supplemental Response:

The State AGs incorporate by reference their June 3, 2024 Responses and Objections to Meta's First Set of Interrogatories, and their April 10, 2025 Second Supplemental Responses and Objections to Meta's First Set of Interrogatories, including their General Objections, Objections to Definitions and Instructions, and specific objections to Interrogatory No. 3. Subject to and without waiving their objections to this Interrogatory, the State AGs provide the following supplemental response.

Meta has engaged in a complex, multifaceted scheme of deception that has misled consumers about the true harm, addictiveness, and COPPA non-compliance of its platforms, as well as its own

responsibility for these defects. Meta engaged in an overall scheme of misleading statements and omissions regarding how it designed its platforms, those platforms' dangerous qualities, the company's choice to prioritize profits over the mental health of its young users, and more. Meta spread its deceptive messaging to the public through several forums and speakers, including in the press, on its website, in Congressional hearings, in its advertisements and branding, and more. Meta also omitted or failed to disclose relevant and material information that would have made its express or implied misrepresentations not deceptive or misleading.

As a courtesy, the State AGs have listed below the links at which certain misrepresentations or omissions alleged in the Complaint can be accessed. These links largely lead to media articles or portions of Meta's website. In providing this supplemental response, the State AGs reserve all rights.

<u>Complaint Paragraph Number</u>	<u>Language in the Complaint</u>	<u>Associated Link</u>
122	For example, during a public earnings call on January 29, 2020, Sandberg stated, "[we] have to keep people safe and give them control over their experience on our apps. And we are."	https://s21.q4cdn.com/399680738/files/doc_financials/2019/q4/Q4'19-FB-Earnings-Call-Transcript.pdf
123	Later that year, on October 29, 2020, Sandberg explained during a different public earnings call that "[w]hile we continue to invest in helping businesses, we are equally focused on keeping our platform safe."	https://s21.q4cdn.com/399680738/files/doc_financials/2020/q3/FB-Q3-2020-Earnings-Call-Transcript.pdf
125	As reported by Quartz, at a technology event in the spring of 2018, Instagram Director of Fashion Partnerships Eva Chen publicly stated that Meta's "entire focus is focusing on the wellbeing of the community" and that "[m]aking the community a safer place, a place where people feel good, is a huge priority for Instagram."	https://archive.ph/Wvh7k
126, 425	And two years later, in May 2021, Mosseri minimized Instagram's negative impact on teens, characterizing it to reporters as	http://archive.today/xqWBT

	“quite small,” as reported by the Wall Street Journal that September.	
167	Mosseri’s post explained that the collection of “[y]our activity . . . helps us understand what you might be interested in . . .” and the collection of “[y]our history of interacting with someone . . . gives us a sense of how interested you are generally in seeing posts from a particular person.”	https://archive.ph/lElPU
168	Similarly, Facebook’s Vice President of Global Affairs wrote in Medium on March 31, 2021, about Facebook’s Recommendation Algorithms: “The goal is to make sure you see what you find most meaningful—not to keep you glued to your smartphone for hours on end. You can think about this sort of like a spam filter in your inbox: it helps filter out content you won’t find meaningful or relevant, and prioritizes content you will.”	http://archive.today/xSA5B
169	Likewise, Meta’s terms of service on data collection state that Meta uses user data to “[p]rovide, personalize and improve our Products,” “[p]rovide measurement, analytics, and other business services,” “[p]romote safety, integrity and security,” “[c]ommunicate with you,” and “[r]esearch and innovate for social good.”	https://archive.ph/rHojp
187	Likewise, in a June 8, 2021 post on the Instagram website, titled “Shedding More Light on How Instagram Works,” Mosseri describes Meta’s Recommendation Algorithms by providing examples of benign content recommendations (e.g., “if you’re interested in dumplings you might see posts about related topics, like gyoza and dim sum . . .”).	http://archive.today/lElPU
188	The Instagram website also boasts that “[a]t Instagram, we have guidelines that govern what content we recommend to people” and specifies that Instagram “avoid[s] making recommendations that may be inappropriate for younger viewers . . . We use technology to detect both content and accounts that don’t meet these Recommendations Guidelines and to help	http://archive.today/4ma46

	us avoid recommending them. As always, content that goes against our Community Guidelines will be removed from Instagram.”	
223	For example, on October 5, 2021, Zuckerberg reacted to former Facebook product manager Frances Haugen’s whistleblower revelations and testimony to Congress . . . by publicly stating in a post on his Facebook profile: “At the heart of these accusations is this idea that we prioritize profit over safety and well-being. That’s just not true.”	https://archive.ph/6403D https://www.facebook.com/zuck/posts/10113961365418581
265	Indeed, in the context of discussing whether Like counts should remain visible at WIRED’s annual conference on November 8, 2019, Mosseri publicly stated that “[w]e will make decisions that hurt the business if they’re good for people’s well-being and health”	http://archive.today/gnvjI
284	A May 26, 2021 Meta blog post, titled “Giving People More Control on Instagram and Facebook,” claimed that although the company tested Daisy “to see if it might depressurize people’s experience on Instagram,” Meta had decided not to implement it as a default because “not seeing like counts was beneficial for some, and annoying to others.”	http://archive.today/RjMmv
331	For example, on August 1, 2018, Meta published a post online titled “New Time Management Tools on Instagram and Facebook” that described “new tools to help people manage their time on Instagram and Facebook” because Meta purportedly “want[s] the time people spend on Instagram and Facebook to be intentional, positive and inspiring.”	https://about.instagram.com/en-us/file/333695944968537/NJI_Meta_Instagram-Parents-Guide-[Digital].pdf ; https://archive.ph/clnMv
336	Meta publishes this same statement in a section devoted to “[e]ating disorders” and “negative body image” in its “parent and guardian’s guide to Instagram,” which it makes available on its website.	http://archive.today/VATa8
374	In July 2018, Meta told the BBC that “at no stage does wanting something to be	https://archive.ph/Hxrp8 .

	addictive factor into” the design process for its Platforms.	
448	Meta’s external narrative around its proposed Platforms for users under age 13 was misleading because Meta claimed it would prioritize “safety and privacy” of kids under age 13 in versions of Instagram, including in a statement issued to the press and reported by CNBC on May 10, 2021 . . .	https://www.cnbc.com/2021/05/10/attorneys-general-ask-facebook-to-abandon-instagram-for-kids-plans.html
464	For example, in a May 23, 2019 post on its website, entitled “Measuring Prevalence of Violating Content on Facebook,” Meta stated the following: “One of the most significant metrics we provide in the Community Standards Enforcement Report is prevalence. . . . We care most about how often content that violates our standards is actually seen relative to the total amount of times <i>any</i> content is seen on Facebook. This is similar to measuring concentration of pollutants in the air we breathe. When measuring air quality, environmental regulators look to see what percent of air is Nitrogen Dioxide to determine how much is harmful to people. Prevalence is the internet’s equivalent — a measurement of what percent of times someone sees something that is harmful.”	https://archive.ph/wzooz
565	During an official inquest investigating the role that social media platforms played in M.R.’s death, and as reported by the Guardian on September 30, 2022, a Meta executive said that such content was “safe” for children to see.	https://archive.ph/88god
596	For instance, in a September 26, 2021, blog post, Meta’s Vice President of Research Pratiti Raychoudhury suggested that some of the presentations relied upon by the Wall Street Journal used “shorthand language . . . and d[id] not explain the caveats on every slide” because they were “created for and used by people who understood the limitations of the research.”	https://archive.ph/Yod7d
598	Raychoudhury’s September 26, 2021, post claimed that “research shows that on 11 of	https://archive.ph/Yod7d

	12 well-being issues, teenage girls who said they struggled with those difficult issues also said that Instagram made them better rather than worse.”	
664	For example, in September 2021, in response to a Wall Street Journal article regarding underage users on Instagram, Meta provided a written statement claiming that “[l]ike all technology companies, of course, we want to appeal to the next generation, but that’s entirely different from the false assertion that we knowingly attempt to recruit people who aren’t old enough to use our apps.”	https://archive.ph/KQWUf

To further supplement their responses to this interrogatory, the State AGs identify Statements A1 through A9, B1 through B9, C1 through C10, and D1 through D9, as identified in the August 1, 2025 Trial Report of Adam L. Alter, Ph.D. (“Alter Report”). Additionally, the State AGs identify Meta’s Community Standards Enforcement Reports, including, but not limited to, the portions discussed in the Alter Report. Additionally, the State AGs identify the following statements, as either deceptive on their own, or which bolster the deceptive effect of other statements. Deception can arise from an entire mosaic of messages rather than, or in addition to, specific individual messages. As a courtesy, the State AGs also provide the URL at which the statements below can be found, where available.

Statement	URL
On May 15, 2018, Alex Schultz, Vice President of Analytics, referred to Meta “want[ing] to ensure that people’s experiences on Facebook are positive” and that “this report [the Community Standards Enforcement Report], blog and guide show you how we’re trying to do that and open up a conversation on how we can do it better.”	https://about.fb.com/news/2018/05/measuring-our-efforts/
Around October 2019, Meta stated, “We’re re-evaluating our policies - we want our filters to be a positive experience for people.”	https://www.bbc.com/news/business-50152053/
On August 11, 2020, Meta stated that it issues its Community Standards to outline “what is and is not	https://www.facebook.com/business/news/our-commitment-to-safety

1	allowed on Facebook and Instagram” as a way “to	
2	help ensure that communities are safe,” and that the	
3	Community Standards demonstrate the company’s	
4	“commitment to safety.”	
5	Around January 2020, Adam Mosseri gave an	https://www.nytimes.com/2020/01/17/business/
6	interview in the <i>New York Times</i> in which he	instagram-likes.html/
7	portrayed the company as “carefully considering”	
8	hiding likes in “different variations” to reduce the	
9	“potentially corrosive impact of social media.”	
10	On June 17, 2021, Margaret Gould Stewart, Vice	https://tech.facebook.com/ideas/2021/6/responsi
11	President of Product Design & Responsible	ble-innovation/
12	Innovation at Meta, stated: “This is why we created	
13	the central Responsible Innovation (RI) team	
14	several years ago, to help teams at Facebook	
15	proactively surface and address potential harms to	
16	society in all that we build.”	
17	On July 27, 2021, Pavni Diwanji, VP of Youth	https://about.fb.com/news/2021/07/age-
18	Products, stated on Meta’s website: “We’re also	verification/
19	looking at ways we can reduce the incentive for	
20	people under the age of 13 to lie about their age.	
21	The reality is that they’re already online, and with	
22	no foolproof way to stop people from	
23	misrepresenting their age, we want to build	
24	experiences designed specifically for them,	
25	managed by parents and guardians.”	
26	On September 26, 2021, Pratiti Raychoudhury,	https://about.fb.com/news/2021/09/research-
27	Vice President, Head of Research, wrote that	teen-well-being-and-instagram/
28	“Suggesting that Instagram is toxic for teens is	
	simply not backed up by the facts.”	
	On September 30, 2021, Antigone Davis, Meta’s	https://www.congress.gov/117/chrg/CHRG-
	Head of Global Safety, stated: “In my current role,	117shrg53125/CHRG-117shrg53125.pdf
	I work with internal teams and external	
	stakeholders to ensure that Facebook remains a	
	leader in online safety, including issues of bullying	
	and combating child exploitation... At Facebook,	
	we take the privacy, safety, and well-being of all	
	those who use our platform very seriously,	
	especially the youngest people on our services. We	
	work tirelessly to put in place the right policies,	
	products, and precautions so they have a safe and	
	positive experience. We have dedicated teams	
	focused on youth safety and we invest significant	
	resources in protecting teens online... We work	
	constantly to improve safety and privacy	
	protections for young people.”	

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	On September 30, 2021, Antigone Davis stated: “We’ve also introduced new ways to support people on Instagram who may be affected by negative body image or an eating disorder, including surfacing more expert-backed resources when people search for eating disorder-related content, expanding our work with experts to help inform our policies, and collaborating with community leaders to help them create and share positive, inspiring body image content.” On September 30, 2021, Senator Blackburn asked: “But you were going to apply [monthly active people] to children under 13. So therefore, you were trying to quantify the number of children that were under 13 years of age that were using your site. Correct?” Antigone Davis responded, “that doesn’t sound accurate to me.” On December 7, 2021, when launching the Take a Break tool, Meta described it in a blog post as “empower[ing] people to make informed decisions about how they’re spending their time.” On January 29, 2023, Antigone Davis stated: “We haven’t waited for regulation to continue making progress on our apps. Over the past several years, we’ve taken significant steps, including: ... Using age verification technology to help teens have age-appropriate experiences... Removing more content that violates our policies and making potentially sensitive content more difficult to find... Offering tools for teens to spend more meaningful time online” On June 27, 2023, Meta stated: “Sleep is important, particularly for young people, so we’re launching new nighttime nudges that will show up when teens have spent more than 10 minutes on Instagram in places like Reels or Direct Messages late at night. They’ll remind teens that it’s late, and encourage them to close the app.” On January 9, 2024, Meta stated: “We regularly consult with experts in adolescent development, psychology and mental health to help make our platforms safe and age-appropriate for young people, including improving our understanding of	https://www.congress.gov/117/chrg/CHRG-117shrg53125/CHRG-117shrg53125.pdf; https://www.commerce.senate.gov/2021/9/protecting-kids-online-facebook-instagram-and-mental-health-harms https://www.congress.gov/117/chrg/CHRG-117shrg53125/CHRG-117shrg53125.pdf https://about.fb.com/news/2021/12/new-teen-safety-tools-on-instagram/ https://about.fb.com/news/2023/01/providing-safe-experiences-for-teens/ https://about.fb.com/news/2023/06/parental-supervision-and-teen-time-management-on-metas-apps/ https://about.fb.com/news/2024/01/teen-protections-age-appropriate-experiences-on-our-apps/
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1	which types of content may be less appropriate for teens.”	
2	On January 25, 2024, Meta stated, “We want teens	https://about.fb.com/news/2024/01/introducing-
3	to have safe, age-appropriate experiences on our	stricter-message-settings-for-teens-on-
4	apps. We’ve developed more than 30 tools and	instagram-and-facebook/
5	features to help support teens and their parents, and	
6	we’ve spent over a decade developing policies and	
7	technology to address content and behavior that	https://about.fb.com/news/2024/01/our-work-
8	breaks our rules.”	to-help-provide-young-people-with-safe-
9	On January 31, 2024, Meta stated, “We go beyond	positive-experiences/
10	legal requirements and use sophisticated	
11	technology to proactively seek out abusive	https://about.fb.com/news/2024/09/preventing-
12	material, and as a result, we find and report more	suicide-and-self-harm-content-spreading-
13	inappropriate content than anyone else in the	online/
14	industry.”	
15	On September 12, 2024, Antigone Davis stated,	
16	“Between April and June this year, we took action	
17	on over 12 million pieces of suicide and self-harm	
18	content on Facebook and Instagram. While we	
19	allow people to discuss their experiences with	
20	suicide and self-harm - as long as it’s not graphic	
21	or promotional - this year we’ve taken important	
22	steps to make this content harder to find in Search	
23	and to hide it completely from teens, even if it’s	
24	shared by someone they follow.”	
25	On September 17, 2024, Meta stated, “We	https://about.fb.com/news/2024/09/instagram-
26	developed Teen Accounts with parents and teens in	teen-accounts/
27	mind. The new Teen Account protections are	
28	designed to address parents’ biggest concerns,	
	including who their teens are talking to online, the	
	content they’re seeing and whether their time is	
	being well spent.”	
	On September 20, 2024, Meta stated in a report	Meta, Unlocking Potential: 2024 Responsible
	called “Unlocking Potential: Our 2024 Responsible	Business Practices Report (2024).
	Business Practices Report” that “We know younger	https://about.fb.com/news/2024/09/2024-
	people who use our technologies require additional	responsible-business-practices-report/
	safeguards for their safety, privacy and well-being.”	
	Meta also stated in its 2024 Responsible Business	Meta, Unlocking Potential: 2024 Responsible
	Practices Report that “Advertisers are not able to	Business Practices Report (2024).
	target teens based on interests, activities or gender.	
	Teens’ engagement on our technologies – like	
	following certain Facebook pages or Instagram	
	accounts – will not inform the types of ads they see.	
	Teen-specific controls and resources help them	
	understand how ads work and the reasons why they	

1	see certain ads on our technologies. These changes	
2	reflect research, direct feedback from parents and	
3	child developmental experts, UN children's rights	
4	principles and global regulation."	
5	In September 2024, Adam Mosseri described Teen	https://www.goodmorningamerica.com/family/s
6	Accounts as "an automatic set of protections for	tory/instagram-introduces-teen-accounts-
7	teens that try to proactively address the top	113734038
8	concerns that we've heard from parents about teens	
9	online."	
10	On November 19, 2024, Meta stated on its website:	https://about.fb.com/news/2024/11/introducing-
11	"We want to make sure everyone on Instagram –	recommendations-reset-instagram/
12	especially teens – has safe, positive, age-	
13	appropriate experiences and feels the time they're	
14	spending on Instagram is valuable. In addition to	
15	providing built-in protections from sensitive	
16	content with Teen Accounts, we want to give teens	
17	new ways to shape their Instagram experience, so it	
18	can continue to reflect their passions and interests	
19	as they evolve.	
20	That's why we've started testing the ability for	
21	everyone on Instagram – including teens – to reset	
22	their recommendations."	
23	Meta has stated:	
24	"Prevalence" is defined as "the frequency at which	https://about.fb.com/news/2019/05/enforcing-
25	content that violated our Community Standards was	our-community-standards-3/;
26	viewed."	https://transparency.fb.com/policies/improving-
27	"Another way to think of prevalence is how many	prevalence-metric/
28	views of violating content we didn't prevent" and	
29	"people may still see."	
30	Meta has stated that prevalence is its "critical"	https://about.fb.com/news/2019/05/measuring-
31	metric, "because it helps us measure how violations	prevalence/
32	impact people" on its platforms.	
33	Meta has stated, "We care deeply about the safety	https://transparency.meta.com/policies/commun
34	of the people who use our apps. We regularly	ity-standards/suicide-self-injury/;
35	consult with experts in suicide, self-injury and	https://transparency.meta.com/policies/commun
36	eating disorders to help inform our policies and	ity-standards/
37	enforcement, and we work with organizations	
38	around the world to provide assistance to people in	
39	distress."	
40	Meta has stated, "Bullying and harassment happen	https://transparency.meta.com/policies/commun
41	in many places and come in many different forms	ity-standards/bullying-harassment/;
42	from making threats and releasing personally	

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	identifiable information to sending threatening messages and making unwanted malicious contact. We do not tolerate this kind of behavior because it prevents people from feeling safe and respected on Facebook, Instagram, and Threads.”	https://transparency.meta.com/policies/community-standards/ .
28	Meta's “Best Interests of the Child Framework” includes the principle "Create safe, age-appropriate environments for youth.”	https://www.ttclabs.net/news/metabest-interests-of-the-child-framework

The State AGs make this supplemental response based on their current knowledge and information, and without prejudice to their ability to amend or supplement this response or to rely on additional facts and documents gained throughout the course of fact and expert discovery or at any time before trial.

Dated: January 7, 2026

Respectfully submitted,

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4 /s/ Jonathan R. Burns

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*Attorneys for the Plaintiff Commonwealth of
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ex rel. Jason S. Miyares, Attorney General

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I am a Senior Legal Analyst with the California Department of Justice, Office of the Attorney General. I am authorized to make this Verification on behalf of the California Department of Justice, Office of the Attorney General. I have read the **State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories** and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 23rd day of December, 2025 in San Diego, California.

Roberta Matson

Digitally signed by Roberta
Matson

Date: 2025.12.23 10:48:24 -08'00'

Roberta Matson
Senior Legal Analyst

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Krista Batchelder, am counsel for the Colorado Office of the Attorney General. I am authorized to make this Verification for and on behalf of the Colorado Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, this 6th day of January in 2026.

/s/ Krista Batchelder
Deputy Solicitor General
Colorado Department of Law

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Casey Rybak, am a paralegal for the Connecticut Office of the Attorney General. I am authorized to make this Verification for and on behalf of the Connecticut Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 22nd day of December, 2025 in Hartford, CT

/s/Casey Rybak
Casey Rybak, Paralegal Specialist

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Ryan T. Costa, am counsel for the Delaware Office of the Attorney General. I am authorized to make this Verification for and on behalf of the Delaware Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 22nd day of December 2025 in Chester County, Pennsylvania.

/s/ Ryan T. Costa

Ryan T. Costa (Bar ID# 5325)
Deputy Director of Consumer Protection
Deputy Attorney General
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*Attorney for State of Delaware, ex rel.
Kathleen Jennings, Attorney General
for the State of Delaware*

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Matthew Davies, am counsel for the Illinois Office of the Attorney General. I am authorized to make this Verification for and on behalf of the Illinois Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 21st day of December, 2025 in Chicago, Illinois.

/s/ Matthew Davies

Matthew Davies
Supervising Attorney, Consumer Fraud Bureau
Office of the Illinois Attorney General

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Corinne Gilchrist, am counsel for the Indiana Office of the Attorney General. I am authorized to make this Verification for and on behalf of the Indiana Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 22nd day of December, 2025.



Corinne Gilchrist
Section Chief, Consumer Litigation

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, James Rodriguez, am counsel for the Kansas Office of the Attorney General. I am authorized to make this Verification for and on behalf of the Kansas Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 5th day of January, 2026 in Topeka, Kansas.

/s/ James Rodriguez
James Rodriguez
Assistant Attorney General

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Matthew Cocanougher, am counsel for the Kentucky Office of the Attorney General. I am authorized to make this Verification for and on behalf of the Kentucky Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 6th day of January, 2026 in Danville, Kentucky.



Matthew Cocanougher
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VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Asyl Nachabe, am counsel for the Louisiana Office of the Attorney General. I am authorized to make this Verification for and on behalf of the Louisiana Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 22nd day of December, 2025 in New Orleans, Louisiana.

/s/ Asyl Nachabe
Asyl Nachabe
Assistant Attorney General
Louisiana Office of the Attorney General

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Evan Romanoff, am counsel for the Minnesota Office of the Attorney General. I am authorized to make this Verification for and on behalf of the Minnesota Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 21st day of December, 2025 in Eden Prairie, Minnesota.

/s/ Evan Romanoff
EVAN ROMANOFF
Assistant Attorney General

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Anna Anderson, am counsel for the Nebraska Office of the Attorney General. I am authorized to make this Verification for and on behalf of the Nebraska Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 19 day of December, 2025 in Lincoln, Nebraska.

/s/ Anna M. Anderson
Anna M. Anderson
Assistant Attorney General
Nebraska Office of the Attorney General

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Mandy Wang, am counsel for the New Jersey Office of the Attorney General. I am authorized to make this Verification for and on behalf of the New Jersey Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 18th day of December, 2025 in Jersey City, New Jersey.

/s/ Mandy Wang
Mandy Wang
Deputy Attorney General
New Jersey Office of the Attorney General

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Nathaniel Kosslyn, am counsel for the New York Office of the Attorney General. I am authorized to make this Verification for and on behalf of the New York Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 19th day of December, 2025 in New York, New York.

/s/ Nathaniel Kosslyn

Nathaniel Kosslyn

Assistant Attorney General

Bureau of Internet and Technology

Office of the New York Attorney General

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Charles White, am counsel Plaintiff State of North Carolina ex rel. Jeff Jackson, Attorney General. I am authorized to make this Verification for and on behalf of the Plaintiff State of North Carolina ex rel. Jeff Jackson, Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

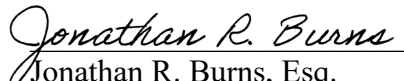
I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 19th day of December, 2025 in Raleigh, North Carolina.

/s/ Charles White
Charles White
Assistant Attorney General
North Carolina Department of Justice

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Jonathan Burns, am counsel for the Pennsylvania Office of the Attorney General. I am authorized to make this Verification for and on behalf of the Pennsylvania Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 19th day of December, 2025 in Harrisburg, Pennsylvania.


Jonathan R. Burns, Esq.
Senior Deputy Attorney General
Pennsylvania Office of Attorney General
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Harrisburg, PA 17120

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Anna C. Smith, am counsel for the South Carolina Office of the Attorney General. I am authorized to make this Verification for and on behalf of the South Carolina Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 19th day of December, 2025 in Columbia, South Carolina.

/s/ Anna C. Smith
Anna C. Smith
Assistant Attorney General

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Joelle Gotwals, am counsel for the Virginia Office of the Attorney General. I am authorized to make this Verification for and on behalf of the Virginia Office of the Attorney General. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 23rd day of December, 2025 in Richmond, Virginia.



Joelle Gotwals
Senior Assistant Attorney General
Office of the Attorney General of Virginia

VERIFICATION OF FOURTH SUPPLEMENTAL INTERROGATORY ANSWER TO FIRST SET OF INTERROGATORIES

I, Brittany A. Copper, am counsel for the Wisconsin Department of Justice. I am authorized to make this Verification for and on behalf of the Wisconsin Department of Justice. I have read the State Attorneys General's Fourth Supplemental Response to Meta Platform Inc.'s First Set of Interrogatories and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry, and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 22nd day of December 2025 in Madison, Wisconsin.

/s/ Brittany A. Copper
Brittany A. Copper
Assistant Attorney General
Wisconsin Department of Justice