

EXHIBIT 22

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UNITED STATES DISTRICT COURT
FOR THE 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

**META DEFENDANTS' THIRD AMENDED
RESPONSES AND OBJECTIONS TO
PLAINTIFFS' FIRST SET OF REQUESTS
FOR ADMISSION**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

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Defendants Meta Platforms, Inc., Meta Payments Inc., Siculus LLC, Facebook Operations, LLC, and Instagram, LLC (collectively, “Defendants” or “Meta”), by and through their attorneys, Covington & Burling LLP, submit their third amended responses and objections to Plaintiffs’ First Set of Requests for Admission (“Requests”) served on November 8, 2024.

Meta’s responses to the Requests are made to the best of its current knowledge, information, and belief. Meta reserves the right to further supplement or amend any of its responses should future investigation indicate that such supplementation or amendment is necessary.

RESPONSES AND OBJECTIONS TO SPECIFIC REQUESTS FOR ADMISSION**REQUEST FOR ADMISSION NO. 7:**

Admit that, from Instagram’s inception to the present, You did not provide parents a means to review the personal information that Instagram collects from their children.

RESPONSE (December 23, 2024):

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta further objects to this Request as premature, given the stage of these proceedings. Meta has not completed its investigation or discovery in this case. Meta further objects to this Request on the ground that its use of the undefined phrases “Instagram’s inception,” “means to review,” “personal information that Instagram collects” and “their children” renders this Request vague and ambiguous. Meta interprets the terms “collects,” “parent,” “personal information,” and “child,” to have the meanings reflected in 15 U.S.C. § 6501 and 16 CFR § 312.2

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Except as expressly admitted below, Meta DENIES this Request for Admission. Since 2012, Meta’s Terms of Use have prohibited individuals under the age of 13 from creating an Instagram account. Persons who enter a date of birth indicating that they are under 13 during the Instagram registration process are not permitted to create an account, and Meta does not store personal information for such persons. If Meta has reliable evidence indicating that a user permitted to create an account is under the age of 13, then Meta will place the user in an age checkpoint. If the user is unable to demonstrate that they are 13 years of age or older, their account (and all other accounts in the same Accounts Center) and the data associated with the account(s) is scheduled to be deleted. As such, since 2012, Meta has not obtained parental consent for individuals under the age of 13 to use Instagram. Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

AMENDED RESPONSE (February 11, 2025):

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta further objects to this Request as premature, given the stage of these proceedings. Meta has not completed its investigation or discovery in this case. Meta further objects to this Request on the

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ground that its use of the undefined phrases “Instagram’s inception,” “means to review,” “personal information that Instagram collects” and “their children” renders this Request vague and ambiguous. Meta interprets the terms “collects,” “parent,” “personal information,” and “child,” to have the meanings reflected in 15 U.S.C. § 6501 and 16 CFR § 312.2

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Except as expressly admitted below, Meta DENIES this Request for Admission. Since 2012, Meta’s Terms of Use have prohibited individuals under the age of 13 from creating an Instagram account. Persons who enter a date of birth indicating that they are under 13 during the Instagram registration process are not permitted to create an account, and Meta does not store personal information for such persons. If Meta has reliable evidence indicating that a user permitted to create an account is under the age of 13, then Meta will place the user in an age checkpoint. If the user is unable to demonstrate that they are 13 years of age or older, their account (and all other accounts in the same Accounts Center) and the data associated with the account(s) is scheduled to be deleted. As such, since 2012, Meta has not provided parents a means to review inaccurate or accurate personal information that Instagram collects from their children under 13 because children under 13 are not authorized to open an account on Instagram and Meta therefore does not knowingly collect personal information from children under 13. The Instagram Terms of Use also state that to use Instagram individuals must be at least 13 years old. Therefore, Meta does not knowingly collect personal information from individuals under 13 on Instagram, regardless of whether those individuals are logged into an Instagram account, and therefore Meta has not provided parents means to review personal information of their children under 13 whom Meta does not know exist. Accordingly, since 2012, Meta has not provided parents means to review personal information for individuals under the age of 13 to use Instagram. Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

AMENDED RESPONSE (January 27, 2026):

Meta incorporates by reference its December 23, 2024 Responses and Objections to Plaintiffs’ First Set of Requests for Admission and, in particular, the Responses and Objections to All Requests and the specific objections to Request No. 7 therein, and its February 11, 2025 Amended Responses and Objections to Plaintiffs’ First Set of Requests for Admission and, in particular, the Responses and Objections to All Requests and the specific objections to Request No. 7 therein as if fully set forth herein.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Except as expressly admitted below, Meta DENIES this Request for Admission. Since 2012, Meta’s Terms of Use have prohibited individuals under the age of 13 from creating an Instagram account. Persons who enter a date of birth indicating that they are under 13 during the Instagram registration process are not permitted to create an account, and Meta does not store personal information for such persons. If Meta has reliable evidence indicating that a user permitted to create an account is under the age of 13, then Meta will place the user in an age checkpoint. If the user is unable to demonstrate

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1 that they are 13 years of age or older, their account (and all other accounts in the same Accounts Center)
2 and the data associated with the account(s) is scheduled to be deleted. As such, since 2012, Meta has not
3 provided parents a means to review inaccurate or accurate personal information knowingly collected from
4 their children under 13 because children under 13 are not authorized to open an account on Instagram and
5 Meta therefore does not knowingly collect personal information from children under 13. The Instagram
6 Terms of Use also state that to use Instagram individuals must be at least 13 years old. Therefore, Meta
7 does not knowingly collect personal information from individuals under 13 on Instagram, regardless of
8 whether those individuals are logged into an Instagram account, and therefore Meta has not provided
9 parents means to review personal information of their children under 13 whom Meta does not know exist.

10 Meta reserves the right to supplement or modify its response based upon documents or information
11 identified over the course of discovery.

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DATED: January 27, 2026

Respectfully submitted,

By: /s/ Ashley M. Simonsen

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