

EXHIBIT 3

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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' SECOND
AMENDED RESPONSES AND
OBJECTIONS TO PLAINTIFFS' THIRD
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 second amended responses and objections to Plaintiffs’ Third Set of Requests for Admission (“Requests”) served on February 21, 2025.

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. 20:

Admit that You do not provide a means for a parent to review the personal information collected from their Children who visit Facebook with or without logging into an account, in a manner described in 16 CFR § 312.6(a)(3).

RESPONSE (April 1, 2025):

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period. Accordingly, Meta will limit its response to this Request to the Relevant Time Period. Meta further objects to this Request on the ground that its use of the undefined phrases “visit,” “review,” and “with or without logging into” renders this Request vague and ambiguous. Meta objects to this request to the extent it suggests that individuals under the age of 13 are permitted users of Facebook or Instagram, which they are not. Meta interprets the terms “collected,” “parent,” and “personal information” 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 set out below, Meta DENIES this request.

Since at least 2012, Facebook’s Terms of Service have prohibited individuals under the age of 13 from creating a Facebook account. Persons who enter a date of birth indicating that they are under 13 during the Facebook 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 an individual who has created 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, by failing to appeal or making an unsuccessful attempt to appeal the checkpoint, their account is deleted in accordance with Meta’s standard deletion protocols. When Meta deletes a user’s account, Meta’s systems delete, as defined in 16 CFR § 312.2, all data associated with the account. The Terms of Service also state that to use Facebook individuals must be at least 13 years old. Therefore, because during the Relevant Time Period, Meta has not knowingly collected personal information from individuals under 13 on Facebook, regardless of

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whether those individuals have been logged into a Facebook account, Meta has not provided parents means to review personal information of their children under 13 whom Meta does not know exist.

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

AMENDED RESPONSE (May 2, 2025):

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period. Accordingly, Meta will limit its response to this Request to the Relevant Time Period. Meta further objects to this Request on the ground that its use of the undefined phrases “visit,” “review,” and “with or without logging into” renders this Request vague and ambiguous. Meta objects to this request to the extent it suggests that individuals under the age of 13 are permitted users of Facebook or Instagram, which they are not. Meta interprets the terms “collected,” “parent,” and “personal information” 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 at least 2012, Facebook’s Terms of Service have prohibited individuals under the age of 13 from creating a Facebook account. Persons who enter a date of birth indicating that they are under 13 during the Facebook 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 an individual who has created 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, by failing to appeal or making an unsuccessful attempt to appeal the checkpoint, their account is deleted in accordance with Meta’s standard deletion protocols. When Meta deletes a user’s account, Meta’s systems delete, as defined in 16 CFR § 312.2, all data associated with the account. The Terms of Service also state that to use Facebook individuals must be at least 13 years old. Therefore, because during the Relevant Time Period, Meta has not knowingly collected personal information from individuals under 13 on Facebook, regardless of whether those individuals have been logged into a Facebook account, Meta has not provided parents means to review personal information of their children under 13 whom Meta does not know exist.

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 April 1, 2025 Responses and Objections to Plaintiffs’ Third Set of Requests for Admission and, in particular, the Responses and Objections to All Requests and the specific objections to Request No. 20 therein, and its May 2, 2025 Amended Responses and Objections to Plaintiffs’ Third Set of Requests for Admission and, in particular, the specific objections to Request No. 20 therein as if fully set forth herein.

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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 at least 2012, Facebook's Terms of Service have prohibited individuals under the age of 13 from creating a Facebook account. Persons who enter a date of birth indicating that they are under 13 during the Facebook 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 an individual who has created 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, by failing to appeal or making an unsuccessful attempt to appeal the checkpoint, their account is deleted in accordance with Meta's standard deletion protocols. When Meta deletes a user's account, Meta's systems delete, as defined in 16 CFR § 312.2, all data associated with the account. The Terms of Service also state that to use Facebook individuals must be at least 13 years old. Therefore, during the Relevant Time Period, Meta has not knowingly collected personal information from individuals under 13 on Facebook, regardless of whether those individuals have been logged into a Facebook account. Thus, Meta has not provided parents means to review personal information knowingly collected from their children under 13 whom Meta does not know exist on the platform.

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

REQUEST FOR ADMISSION NO. 21:

Admit that You do not provide a means for a parent to refuse to permit the further use or maintenance of the information collected from their Child on Your Platforms, in the manner described in 16 CFR § 312.6(a)(2).

RESPONSE (April 1, 2025):

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta further objects to this Request on the ground that its use of the undefined phrases "maintenance of the information collected" and "information" renders this Request vague and ambiguous. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period. Accordingly, Meta will limit its response to this Request to the Relevant Time Period. Meta objects to this request to the extent it suggests that individuals under the age of 13 are permitted users of Facebook or Instagram, which they are not. Meta interprets the terms "collected," "parent," and "personal information" to have

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the meanings reflected in 15 U.S.C. § 6501 and 16 CFR § 312.2. Meta will interpret “information” to mean “personal information” as 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 set out below, Meta DENIES this Request for Admission.

Since at least 2012, Facebook’s Terms of Service and Instagram’s Terms of Use have prohibited individuals under the age of 13 from creating a Facebook or Instagram account. Persons who enter a date of birth indicating that they are under 13 during the Facebook or 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 an individual who has created 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, by failing to appeal or making an unsuccessful attempt to appeal the checkpoint, their account is deleted in accordance with our standard deletion protocols. When Meta deletes a user’s account, Meta’s systems delete, as defined in 16 CFR § 312.2, all data associated with the account. As such, since 2012, Meta has not provided parents a means, as described in 16 CFR § 312.6(a)(2), to (1) refuse to permit the further use of personal information collected from their children under 13, or (2) to direct the operator to delete the child’s personal information, because individuals under 13 are not authorized to open an account on Instagram or Facebook and Meta therefore does not knowingly collect personal information from individuals under 13. The Terms of Service and Terms of Use also state that to use Facebook or Instagram individuals must be at least 13 years old. Therefore, because during the Relevant Time Period, Meta has not knowingly collected personal information from individuals under 13 on Facebook or Instagram, regardless of whether those individuals have been logged into a Facebook or Instagram account, Meta has not provided parents a means to refuse to permit the further use of personal information from their children whom Meta does not know exist.

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

AMENDED RESPONSE (May 2, 2025):

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta further objects to this Request on the ground that its use of the undefined phrases “maintenance of the information collected” and “information” renders this Request vague and ambiguous. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period. Accordingly, Meta will limit its response to this Request to the Relevant Time Period. Meta objects to this request to the extent it suggests that individuals under the age of 13 are permitted users of Facebook or Instagram, which they are not. Meta interprets the terms “collected,” “parent,” and “personal information” to have the meanings reflected in 15 U.S.C. § 6501 and 16 CFR § 312.2. Meta will interpret “information” to mean “personal information” as 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 at least 2012, Facebook’s Terms of Service and Instagram’s Terms of Use have prohibited individuals under the age of 13 from creating a Facebook or Instagram account. Persons who enter a date of birth indicating that they are under 13 during the Facebook or 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 an individual who has created 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

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of age or older, by failing to appeal or making an unsuccessful attempt to appeal the checkpoint, their account is deleted in accordance with our standard deletion protocols. When Meta deletes a user's account, Meta's systems delete, as defined in 16 CFR § 312.2, all data associated with the account. As such, since 2012, Meta has not provided parents a means, as described in 16 CFR § 312.6(a)(2), to (1) refuse to permit the further use of personal information collected from their children under 13, or (2) to direct the operator to delete the child's personal information, because individuals under 13 are not authorized to open an account on Instagram or Facebook and Meta therefore does not knowingly collect personal information from individuals under 13. The Terms of Service and Terms of Use also state that to use Facebook or Instagram individuals must be at least 13 years old. Therefore, because during the Relevant Time Period, Meta has not knowingly collected personal information from individuals under 13 on Facebook or Instagram, regardless of whether those individuals have been logged into a Facebook or Instagram account, Meta has not provided parents a means to refuse to permit the further use of personal information from their children whom Meta does not know exist.

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 April 1, 2025 Responses and Objections to Plaintiffs' Third Set of Requests for Admission and, in particular, the Responses and Objections to All Requests and the specific objections to Request No. 21 therein, and its May 2, 2025 Amended Responses and Objections to Plaintiffs' Third Set of Requests for Admission and, in particular, the specific objections to Request No. 21 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 at least 2012, Facebook's Terms of Service and Instagram's Terms of Use have prohibited individuals under the age of 13 from creating a Facebook or Instagram account. Persons who enter a date of birth indicating that they are under 13 during the Facebook or 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 an individual who has created 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, by failing to appeal or making an unsuccessful attempt to appeal the checkpoint, their account is deleted in accordance with our standard deletion protocols. When Meta deletes a user's account, Meta's systems delete, as defined in 16 CFR § 312.2, all data associated with the account. Individuals under 13 are not authorized to open an account on Instagram or Facebook and Meta therefore does not

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1 knowingly collect personal information from individuals under 13. As such, since 2012, Meta has not
2 provided parents a means, as described in 16 CFR § 312.6(a)(2), to (1) refuse to permit the further use of
3 personal information knowingly collected from their children under 13, or (2) to direct the operator to
4 delete the child's personal information knowingly collected. The Terms of Service and Terms of Use also
5 state that to use Facebook or Instagram individuals must be at least 13 years old. Therefore, because during
6 the Relevant Time Period, Meta has not knowingly collected personal information from individuals under
7 13 on Facebook or Instagram, regardless of whether those individuals have been logged into a Facebook
8 or Instagram account, Meta has not provided parents a means to refuse to permit the further use of personal
9 information from their children whom Meta does not know exist on the platforms.

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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