

Exhibit 3

[Submitting Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

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

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

MDL No. 3047

**NOTICE OF VIDEOTAPED RULE 30(b)(6)
DEPOSITION OF DEFENDANT META
PLATFORMS, INC.**

This Document Relates to:

ALL ACTIONS

ISSUING PARTY: State Attorney General Plaintiffs

PRODUCING PARTY: Meta Platforms, Inc.

TO: Meta Platforms, Inc. and its Attorneys of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30(b)(6), the State Attorney General Plaintiffs, by and through the undersigned counsel, will take the deposition of the corporate designee(s) of Defendant Meta Platforms, Inc (“Meta”) in the above-captioned action on the topics listed on Schedule B attached hereto, at 1515 Clay Street, Suite 2000, Oakland, CA 94612, commencing at 9:00 AM PST on February 27, 2025.

Meta is directed to designate a person or persons to testify on its behalf on the matters listed in Schedule B attached to this Notice of Deposition and to produce the documents identified on Schedule C.

SCHEDULE B

1. Meta's research on the following topics during the Relevant Time Period:
 - a) the interests and number of Child Users of Facebook and Instagram; and
 - b) existing or potential features on Facebook or Instagram that would be attractive or appealing to Tweens.
2. The means by which, extent to which, and purpose(s) for which, Meta did any of the following during the Relevant Time Period:
 - a) Collected, used, or disclosed data from:
 - i) persons who visited Facebook or Instagram without logging into an account;
 - ii) Users of known or unknown age; or
 - iii) Child Users; or
 - b) Monetized information collected from Child, Teen, or Youth Users;
 - c) Partnered, worked with, hosted events featuring, or reached out to Child or Teen celebrities and influencers, including through its operation of "Instacamp"; or
 - d) Authenticated the owner or operator of Facebook and Instagram accounts, including to "verify" an account or determine if an account purportedly belonging to a Child is owned or operated by an adult.
3. Meta's official, written policies for complying with COPPA for its Instagram and Facebook platforms during the Relevant Time Period.
4. The means by which, and extent to which, Meta did any of the following during the Relevant Time Period:
 - a) Reviewed, investigated, and took action on reports of Child Users, including Meta's backlogs or delays in reviewing reports, such as the backlog of hundreds of thousands of reports in 2021;
 - b) Detected, reviewed, and removed the accounts of Child Users;
 - c) Obtained verifiable parental consent in compliance with COPPA;
 - d) Provided notice to parents of Child Users in compliance with COPPA;

- e) Deleted any personal information collected from a Child in compliance with COPPA;
 - f) Prevented further collection of personal information from individuals determined to be Child Users;
 - g) Collected the self-reported age of new or existing Users;
 - h) Used personal information, information derived from personal information, or other data collected from Child or Teen Users in training or developing algorithms or models; or
 - i) Identified multiple accounts associated with the same User, and whether or not Meta used such means to identify multiple accounts associated with a User that was reported to Meta as a Child or that Meta determined to be a Child.
5. Inauthentic reports of Child Users, including scripting attacks on reporting forms, and Meta's practices for identifying such inauthentic reports, during the Relevant Time Period.
 6. Meta's age inference algorithms and models and use of inferred age data during the Relevant Time Period, including, but not limited to, any algorithms or models that may identify a User as being a Child.
 7. The interpretation and meaning of the structured data that Meta has produced or will produce in this action responsive to Personal Injury/School District Plaintiffs' Request for Production of Documents (RFP) No. 124, or State AGs' RFP Nos. 100, 102, 107, 112, 113, 118, 121-123, 148-153, 159-164.
 8. The development and content of Meta's audited financial statements, inclusive notes, and Management's Discussion and Analysis; Meta's other SEC filings; and Meta's financial reporting and internal control framework.
 9. Meta's development, management, storage, retention, mechanisms for querying, and use of the following categories of data concerning the Users of Facebook and Instagram:
 - a) The number of Users by U.S. state, country, and other geographic regions;