

Exhibit 4

**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

This Document Relates to:

ALL ACTIONS

**STATE ATTORNEYS GENERAL'S FIRST
SET OF REQUESTS FOR ADMISSION TO
THE META DEFENDANTS**

PROPOUNDING PARTY: State Attorney General Plaintiffs

RESPONDING PARTIES: Defendants Meta Platforms, Inc., Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC

SET: 1

DATE OF SERVICE: February 14, 2025

REQUEST NO. 14.

Admit that Facebook and/or Instagram accounts that you connect using “soft-match” techniques likely belong to the same individual user.

RESPONSE:

REQUEST NO. 15.

Admit that Facebook and/or Instagram accounts that you connect using “soft-match” techniques belong to the same individual user.

RESPONSE:

REQUEST NO. 16.

Admit that you use personal information collected from users of your Platforms to develop, train, or validate algorithms or models.

RESPONSE:

REQUEST NO. 17.

Admit that, when you identify a user as likely being a Child and schedule the user’s data for deletion, you do not determine whether the user’s data was used to develop, train, or validate any of your algorithms or models.

RESPONSE: