

Exhibit 9

COVINGTON

BEIJING BOSTON BRUSSELS DUBAI FRANKFURT
JOHANNESBURG LONDON LOS ANGELES NEW YORK
PALO ALTO SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

Covington & Burling LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
T +1 212 841 1000

By E-Mail

March 5, 2025

Thomas P. Cartmell
Austin Brane
4740 Grand Avenue Suite 300
Kansas City, MO 64112
tcartmell@wcllp.com
abrane@wcllp.com

Paige Boldt
130 N 18th St #1600
Philadelphia, PA 19103
pboldt@anapolweiss.com

***Re: In re: Social Media Adolescent Addiction/Personal Injury
Products Liability Litigation, JCCP 5255 and MDL No. 3047 – Meta
Defendants’ Responses and Objections to Plaintiffs’ Interrogatories***

Dear Counsel,

We write in response to your February 25, 2025 letter regarding the February 20 meet and confer on Plaintiffs’ Interrogatories, Set 2. This letter addresses Interrogatory Nos. 4-7 and 12. We will follow up separately regarding the other Interrogatories.

Interrogatory 4

Meta confirms that it will produce MAU data for Instagram, to the extent available within the Relevant Time Period, broken down by state and by the following age data: (1) accountholder’s stated age; (2) accountholder’s granular age as predicted by Meta’s Age Affinity model; and (3) whether the accountholder was predicted by Meta to be a teen or non-teen.

For Facebook, Meta will produce the same data. Our estimate a few weeks ago was that this could not be produced by the April 4 fact discovery cutoff. While this remains a burdensome effort, in light of recent progress, we are now cautiously hopeful that it can be done.

For both Facebook and Instagram, Meta will include a count of users for whom Meta does not have stated age data. These users will be included in a separate row with the stated age field populated as “unknown.”

COVINGTON

As to MAP data, you last raised this issue in December and asked us to investigate whether Meta has breakdowns of MAP data beyond what is publicly reported. We have confirmed that Meta does not have MAP data broken down by state. As to MAP data by age, this data is not maintained within the business to be used for tracking users on platform as it did not pass internal validity checks and is not typically used for any internal or external purposes. Accordingly, Meta would be unable to provide an interrogatory response verifying the accuracy of the data. The documents referenced in your letter that refer to MAP are one-off informal presentations but are not indicative of regular use of this data. Rather, MAU is a more reliable and often-used metric within Meta, and our extensive and detailed production of this data is more than sufficient for purposes of this litigation. Additionally, MAP data that falls within the Relevant Time Period would be disproportionately burdensome to produce. There are only 60 days of data currently available to Meta, none in the Relevant Time Period. While there is more historical information available in cold storage, it would be burdensome and time-consuming to restore that data. Doing so is not proportionate to the needs of the case in light of the above.

Interrogatories 5-7

Meta addresses Interrogatories Nos. 5-7 together, as Meta will provide the same age, geographic, and percentile breakdowns for each response, to the extent this data is available for each category within the Relevant Time Period.

As discussed in our meet-and-confer, Meta will provide state-level data for Instagram users aged 13-17, including by Plaintiffs' requested percentiles and by age category (stated age, predicted granular age, and predicted teen). For Instagram users aged 18-100, Meta will provide US-level data showing average data by age category (stated age, predicted granular age, and predicted non-teen) without percentile breakdowns.¹

For Facebook, in our meet-and-confer, Meta offered to provide US-level average data for each Interrogatory broken down by the same age categories, but without percentiles. Our estimate a few weeks ago was that breakdowns of this data by state and by percentile for teens (i.e., the same data to be provided for Instagram) could not be produced by the April 4 fact discovery cutoff, but we are now cautiously hopeful that it can be done. For adults, we would provide the same data breakdowns as for adults on Instagram described above.

As with Interrogatory 4, users whose stated age data is unavailable will be categorized as "unknown."

U13 Data

As we have previously explained, Meta does not maintain data for these metrics for U13 users. The stated and predicted ages do not include figures below 13. The

¹ Your letter mistakenly reverses what we said we would produce for teens and for adults.

COVINGTON

documents referenced in your letter contain graphs from 2018 depicting MAP by age and birth year and include age categories for 11- and 12-year-olds. These documents are one-off analyses; they do not change the fact that Meta does not maintain MAP, as discussed above, or the metrics requested in Interrogatory Nos. 5-7, for U13 users.

Interrogatory 12

Meta confirms that it will provide a percentage rate of adoption for the Safety Features identified in Meta's Response to Interrogatory No. 11 for which such data is reasonably available.

Your letter requests data for every month during the Relevant Time Period. This conflicts with what Plaintiffs stated during the February 7, 2025, meet-and-confer. In that discussion, Plaintiffs asked for data within the Relevant Time Period, expressly stated that every month was not needed, and that representative months would be sufficient. In any event, we do not see the relevance of providing monthly breakdowns of this data and it is unduly burdensome and disproportionate to do so. For each Safety Feature identified in Meta's Response to Interrogatory No. 11 for which adoption data is reasonably available, Meta will provide a percentage rate reflecting adoption among US teen users for the entire period during which data is reasonably available.

With respect to age data, we are providing adoption rate data for teens, where available. Again, we do not see the relevance of providing further age-based breakdowns of this data. Moreover, it is burdensome and disproportionate to do so, particularly given the number of safety tools.

If, upon review of the data Meta provides, you identify a need for a specific breakdown for a specific tool, Meta will be willing to meet and confer with you to discuss that need.

Sincerely,

/s/ Philip Irwin
Philip Irwin