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Exhibit K

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

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

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL NO. 3047

Civil Case No. 4:22-md-03047-YGR:

Honorable Yvonne Gonzalez Rogers

**META DEFENDANTS' SECOND
SUPPLEMENTAL RESPONSES AND
OBJECTIONS TO PLAINTIFFS' FIRST
INTERROGATORY**

Defendants Meta Platforms, Inc., Facebook Payments, Inc., Siculus, Inc., Facebook Operations, LLC, and Instagram, LLC, (collectively, "Defendants" or "Meta"), by and through their attorneys, Covington & Burling, LLP, submit their second supplemental responses and objections to Plaintiffs' Interrogatory No. 1 ("Interrogatory") served on May 16, 2024. Meta's responses to the Interrogatory are made to the best of its current knowledge, information, and belief. Meta reserves the right to supplement

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1 15. By responding to an Interrogatory with a defined term, Meta is not by implication agreeing
2 with any such definition.

3 16. Meta is willing to meet and confer concerning the Interrogatories and these responses.

INTERROGATORY NO. 1:

5 Please itemize and describe each Level 2 integrity classifier used by You to track or classify
6 content on the Facebook Platform and/or Instagram Platform. For purposes of this request, “itemize and
7 describe” means to identify the classifier by both its plain language names and alphanumeric code, the
8 date You created the classifier, the Identity of the person who created the classifier, the purpose for which
9 the classifier was created, the characteristics of content the classifier is or was designed to identify, the
10 probability thresholds associated with the classifier at any given time, the related actions taken at each
11 such threshold (including automatic removal or manual review of content) at any given time, and the
12 weight given to each classifier at any given time.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:

14 Meta objects to the use of the undefined phrase “integrity classifier,” making this Interrogatory
15 vague and ambiguous. Meta construes “integrity classifier” to be classifiers that review and detect content
16 for potential violations of Facebook’s Community Standards and Instagram’s Community Guidelines
17 (collectively, “Policies”), to the extent they pertain to the following policy-violating content, also known
18 as “harm areas”: suicide and self-injury (“SSI”) and eating disorder (“ED”), bullying and harassment,
19 graphic and violent content, adult nudity, and child safety. Each of these classifiers is described in further
20 detail in the Response below.

21 Meta further objects to the use of the undefined phrases “plain language names” and “alphanumeric
22 code,” making this Interrogatory vague and ambiguous. Meta construes “alphanumeric code” to refer to
23 the 16-digit numeric code assigned to a classifier for their identification.

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Meta further objects to Plaintiffs' request on September 3, 2024, for Meta to explain "the purpose of borderline classifiers" as vague, overbroad, and duplicative. Letter from Nelson Drake to Kurt Calia at 8 (Sept. 3, 2024). As explained in Meta's initial response:

A "borderline classifier" is an artificial intelligence tool that reviews and detects content on Facebook and Instagram that is not strictly policy-implicating, but nonetheless considered potentially harmful to users. For example, a borderline graphic and violent content classifier would consider content of pus-filled or oozing wounds, people undergoing surgical operations, fight videos, animal abuse, and fictional violence, not strictly policy-violating, but as "borderline content." Where a piece of content is determined to be "borderline content," then that content is not removed, but will be downranked.

MDL Rog. 1 Resp. at 13.

Subject to and without waiving these objections, Meta provides below a Response which generally describes its current classifier system and notes that variations may exist across Instagram and Facebook. The description contained in this Response is therefore not exhaustive or inclusive of every detail comprising every process that may support the classifiers on Facebook or Instagram, and indeed more detailed information is contained within the Meta source code repository that it intends to make available for inspection upon entry of a suitable Source Code Protective Order.

I. Classifiers Generally

A "classifier" refers to an artificial intelligence tool or algorithm that automatically reviews and categorizes content or accounts on Facebook and Instagram for potential further action, including but not limited to content removal, downranking, demoting, filtering, age-gating, the addition of warning screens or captions, or non-action. Classifiers evaluate the content or accounts potentially against Meta's Policies,

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Dated: November 18, 2024

Respectfully submitted,

COVINGTON & BURLING LLP

/s/ Ashley Simonsen

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail on November 18, 2024 on the following:

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I declare under penalty of perjury that the foregoing is true and correct. Executed on November 18, 2024.

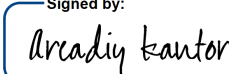
DATED: November 18, 2024 By: /s/ Ashley Simonsen

Ashley M. Simonsen

VERIFICATION

I, Arcadiy Kantor, am Director of Product Integrity at Meta. I am authorized to make this Verification for and on behalf of Meta. I have read META'S SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1, and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 18th day of November, 2024, in Johnson City, TN.

Signed by:


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/s/ Arcadiy Kantor