

Exhibit 2

Ashley M. Simonsen (Bar No. 275203)
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, California 90067-4643
Telephone: + 1 (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

*Attorneys for Defendants Meta Platforms, Inc. f/k/a
Facebook, Inc.; Facebook Holdings, LLC; Facebook
Operations, LLC; Facebook Payments, Inc.;
Facebook Technologies, LLC; Instagram, LLC;
Siculus, Inc.; and Mark Elliot Zuckerberg*

*Additional parties and counsel listed on
signature pages*

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

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

MDL No. 3047

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

Honorable Yvonne Gonzalez Rogers

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**META DEFENDANTS' RESPONSES AND OBJECTIONS TO STATE PLAINTIFFS' FOURTH
SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

1 Defendants Meta Platforms, Inc., Facebook Payments, Inc., Siculus, Inc., Facebook Holdings,
2 LLC, Facebook Operations, LLC, and Instagram, LLC, (collectively, “Defendants” or “Meta”), by and
3 through their attorneys, Covington & Burling, LLP, submit their responses and objections to the State
4 Plaintiffs’ Fourth Set of Requests for the Production of Documents (“Requests”), served on March 4,
5 2025. Meta’s responses to the Requests are made to the best of its current knowledge, information, and
6 belief. Meta reserves the right to supplement or amend any of its responses should future investigation
7 indicate that such supplementation or amendment is necessary.

8 **STATEMENTS AND OBJECTIONS TO ALL REQUESTS**

9 1. Meta objects to the Requests herein that do not describe each item or category of items to
10 be inspected with reasonable particularity, and/or are otherwise vague, ambiguous, overbroad, unduly
11 burdensome, and/or disproportionate to the needs of the litigation. Meta has, where appropriate, defined
12 these Requests and/or the scope of its response as indicated in the specific objections below.

13 2. Meta objects to the Requests and accompanying Instructions and Definitions insofar as
14 they seek to impose obligations in excess of or otherwise different from those imposed by the Federal
15 Rules of Civil Procedure, the Federal Rules of Evidence, the Local Rules of the United States District
16 Court for the Northern District of California, any order of that Court in these cases including the
17 Stipulation and Order Governing the Production of Electronically Stored Information and Hard Copy
18 Documents, or any other applicable federal or state law. Meta will comply with applicable rules, laws and
19 court orders.

20 3. Meta objects to the Requests to the extent that they seek documents that contain
21 confidential or proprietary business information, trade secrets, commercially sensitive information, or
22 confidential personal information of Meta or a non-party. Responsive information, if discoverable, will
23 be provided subject to the terms of the Third Modified Protective Order, Dkt. No. 1209, entered by the
24 Court. Meta reserves the right to seek additional protections beyond those provided in the Protective Order
25 to the extent appropriate for any particularly sensitive documents and/or to object to their production
26 altogether if, for example, their relevance is substantially outweighed by the risk of harm posed by their
27 production in light of the protections available.

1 4. Meta objects to the Requests to the extent they seek documents that contain information
2 that is outside of its possession, custody, or control and to the extent the information sought is already in
3 Plaintiffs' possession, custody, or control; information that is a matter of public record; or information
4 that is available to Plaintiffs from public sources.

5 5. Meta objects to the Requests on the ground and to the extent that they seek the disclosure
6 of source code and/or information related to source code. Discoverable source code and/or information
7 related to source code will be provided subject to the terms of the Source Code Protective Order entered
8 by the Court on February 27, 2025.

9 6. Meta objects to the Requests insofar as they seek the production of contents of third-party
10 communications maintained by Meta. The Stored Communications Act ("SCA") prohibits providers of
11 certain technology services from "knowingly divulg[ing]" the contents of communications maintained by
12 the provider, 18 U.S.C. § 2702(a), subject to specific exemptions, *id.* § 2702(b).

13 7. Meta objects to the Requests to the extent they seek information that is not relevant to the
14 claims or defenses in the case and/or are overbroad, unduly burdensome, and not proportional to the needs
15 of the case. In responding to these Requests, Meta does not concede the relevance or admissibility of the
16 information sought and reserves the right to seek to exclude such information.

17 8. Meta objects to the Requests to the extent that they seek materials relating to users located
18 outside of the United States and/or features not available in the United States. Meta will produce
19 documents relating to users in the United States.

20 9. Meta objects to Definition No. 1 ("Communication") as vague, ambiguous, overbroad,
21 unduly burdensome, and not proportional to the needs of the case to the extent that it imposes obligations
22 beyond those required under Federal Rules and the ESI Order, and purports to include oral and spoken
23 communications, messages or posts on non-Meta platforms, and voice messages.

24 10. Meta objects to Definition No. 3 ("Employee") to the extent that it includes non-employees
25 or non-party entities about which discovery would be irrelevant, overbroad, unduly burdensome, and not
26 proportional to the needs of the case, such as "any person to whom You have provided compensation or
27 remuneration of any kind."
28

1 11. Meta objects to Definition No. 4 (“Instagram Platform”) as vague, ambiguous, overbroad,
2 unduly burdensome, and not proportional to the needs of the case to the extent it includes versions of
3 Instagram’s platforms not publicly released or publicly available during the Relevant Time Period.

4 12. Meta objects to Definition No. 5 (“Harmful Content”) as vague, ambiguous, overbroad,
5 unduly burdensome, and not proportional to the needs of the case, including due to its broad and vague
6 reference to “content related to” various conduct, and its use of undefined, subjective terms like “body
7 image,” “mental health,” “social comparison,” “and “dangerous viral trends.” Meta also objects to the
8 embedded references to “Young Adult Users,” who are not the subject of these cases. Meta further objects
9 to any implication that Meta Platform content “negatively impact[s] or affect[s]” Youth users. Nothing
10 in Meta’s responses is intended to, or does, concede the existence of any causal relationship or link
11 between Meta’s Platform content and Youth health or well-being. Meta interprets the term “Harmful
12 Content” as used in these Requests to mean content that violates its Community Standards or Community
13 Guidelines including content comprising bullying and harassment; child sexual exploitation, abuse, and
14 nudity; human exploitation; and suicide, self-injury, and eating disorders.

15 13. Meta objects to Definition No. 7 (“User”) to the extent it encompasses users that are
16 eighteen years of age (18) or older. Meta will generally interpret this term to mean users at least 13 years
17 of age and under the age of 18, which, for purposes of these responses, Meta will refer to as “Youth” users.

18 14. Meta objects to Definition No. 8 (“You,” “Your,” “Defendant,” or “Defendants”) as vague,
19 ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case to the extent
20 those terms include non-party entities and individuals whose information is outside of Meta’s possession,
21 custody, or control, or include subsidiaries or affiliate services that are not at issue in this action. imposing
22 obligations beyond the parties in the case. Meta will respond by interpreting these terms to mean Meta
23 Platforms, Inc., Facebook Payments, Inc., Siculus, Inc., Facebook Holdings, LLC, Facebook Operations,
24 LLC, and Instagram, LLC.

25 15. Meta objects to Rules of Construction No. 6 (“Relating to,” “relate to,” “concerning,” or
26 “concern”) to the extent that, as used in the Requests, they render those Requests vague, ambiguous,
27 overbroad, unduly burdensome, and not proportional to the needs of the case. Meta will generally interpret
28

1 these terms to mean “discussing,” “referring to,” or “reflecting,” or otherwise to have an objective and
2 apparent reference to the stated subject.

3 16. Meta objects to Plaintiffs’ Instruction No. 2 to the extent it purports to require that “[e]ach
4 Responding Party must respond separately” as without justification, unduly burdensome, and not
5 proportional to the needs of the case. Meta provides these responses and objections collectively, which
6 are made on behalf of each of the Meta Defendant entities, collectively.

7 17. Meta objects to Instruction Nos. 7, 8, 9, and 10 insofar as they purport to impose
8 requirements on Meta beyond those in the Federal Rules and the ESI Order. In particular, Meta is not
9 required to identify already-produced responsive documents (to the extent any such documents exist and
10 were already produced) including by “the beginning and ending Bates number for each such Document.”

11 18. Meta objects to the Relevant Time Period specified in Instruction No. 12 (“January 1, 2012
12 to the present”) as overbroad because it includes, inter alia, time periods for which claims would be barred
13 under the relevant statute of limitations, time periods before and after the relevant underlying events, and
14 time periods that postdate the filing of this action and the relevant time period(s) in DMO 7. Meta also
15 objects to Plaintiffs’ proposed Relevant Time Period as disproportionate given the huge quantities of data
16 and documents that already would need to be collected, stored and searched even for a shorter time period.
17 For purposes of these responses and objections, Meta treats the Relevant Time Period as the period(s)
18 ordered by Judge Kang in DMO No. 7 (i.e., January 1, 2012 – April 1, 2024 generally with other time
19 periods for specific features). These Requests do not relate to new developments, facts or issues that are
20 relevant to these cases, within the contemplation of DMO 7.

21 19. Meta objects to the Requests to the extent they purport to impose duties or requirements
22 on Meta beyond those contained in the Protective Order, ESI Order and other orders, rules, or agreements
23 applicable to this case.

24 20. Meta objects to the Requests to the extent that they seek the production of information
25 protected by the attorney-client privilege, the work-product doctrine, and/or any other applicable privilege,
26 immunity, or protection. Any disclosure of privileged or protected information is not intended to waive
27 those privileges or protections. Meta relatedly objects to Plaintiffs’ Instruction No. 4 to the extent it
28 purports to impose duties or requirements on Meta beyond those contained in the Privilege Log Protocol

1 and other orders, rules, or agreements applicable to this case. To the extent Meta withholds any documents
2 pursuant to an assertion of attorney-client privilege, work-product doctrine, or any other applicable
3 privilege or protection, Meta will produce a privilege log pursuant to the Privilege Log Order entered by
4 the Court.

5 21. Meta's responses are made without waiving or intending to waive (a) the right to object on
6 any ground to the use of any produced documents or data, or their subject matter, in any subsequent
7 proceeding or the trial of this or any other action; (b) the right to object to a demand for further responses
8 to this or any other discovery involving or related to the subject matter of the Requests; and (c) the right
9 at any time to revise, correct, add to, or clarify any or all of the objections.

10 22. Any response to the Requests by Meta indicating that documents will be searched for
11 and/or produced is not an indication or representation that responsive information or documents exist
12 within Meta's possession, custody, or control, but only that Meta intends, subject to its objections, to
13 conduct a reasonable and proportionate search for responsive information in files that are reasonably
14 believed to contain responsive information, for the Relevant Time Period. This reasonable and
15 proportionate search will be conducted pursuant to the ESI Order. Accordingly, Meta's search may
16 include application of appropriate search terms to collect information and documents, further review for
17 responsiveness, privilege, and confidential or private information, and may use additional search or review
18 techniques, such as Technology-Assisted Review in line with the terms of the ESI Order.

19 23. Meta will produce the version of a document as it exists at the time of collection. Meta will
20 not endeavor to locate or recreate or produce all draft versions that might exist or be recoverable, including
21 draft versions of documents automatically created on cloud or server-based storage systems, as doing so
22 would be unduly burdensome and disproportionate to the needs of the litigation. Meta is willing to meet
23 and confer concerning any targeted Request from Plaintiffs seeking draft versions of a specified document.

24 24. By responding to a Request with a defined term, Meta is not by implication agreeing with
25 any such definition.

26 25. Meta is willing to meet and confer concerning the Requests and Meta's response.
27
28

SPECIFIC OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION**REQUEST NO. 184:**

All Documents and Communications related to the policy, operational, and/or systemic changes to Meta’s content moderation efforts announced by Meta CEO Mark Zuckerberg on January 7, 2025.

RESPONSE:

Meta objects to this Request as overly broad, vague, and lacking specificity, seeking information not relevant to the claims and defenses in the case, unduly burdensome, and not proportional to the needs of the case, including because it seeks “[a]ll Documents and Communications related to the policy, operational, and/or systemic changes to Meta’s content moderation efforts announced by Meta CEO Mark Zuckerberg on January 7, 2025” without connection to the claims in this case or regard to whether the requested documents concern Youth or Youth mental health, and relate to a period of time beyond the Relevant Time Period. This Request does not relate to new developments, facts or issues that are relevant to these cases, within the contemplation of DMO 7. See Statement and Objection to All Requests No. 19. Meta further objects to this Request to the extent it seeks information about Meta’s content moderation policies related to its implementation of Community Notes and changes related to civic content, which are not relevant to this litigation. Meta further objects to this Request as vague and ambiguous, including with respect to the phrases “operational” and “systemic changes.” Meta further objects to this Request to the extent it seeks information about Meta’s review and fact-checking of third-party content, as allegations that implicate publishing or monitoring of third-party content are barred by Section 230. Any production(s) that Meta might later agree to make in response to this Request is subject to a full reservation of rights by Meta, including (but not limited to) Meta’s right to object that Section 230 bars the introduction of the produced information (if any) as evidence; that the produced information (if any) is irrelevant and/or inadmissible on other grounds; and that the produced information (if any) may only be admitted subject to a limiting instruction. Meta further objects to this Request to the extent that it may be read to seek documents containing users’ personal identifying information and other information entitled to protection under various consumer privacy laws, including the federal Stored Communications Act, 18 U.S.C. §§ 2701 et seq. Meta further objects to this Request to the extent it seeks communications and other documents including potentially from law enforcement that may be subject to a non-disclosure order

1 or could interfere with an ongoing investigation. Meta further objects to this Request to the extent it seeks
 2 disclosure of policies for investigating and reporting to government authorities because such processes
 3 can be highly confidential and disclosure, if known to potential wrongdoers, can increase their ability to
 4 evade detection and enforcement. Meta further objects to this Request to the extent it seeks information
 5 that may not exist in the normal course of business. Meta further objects to the Request to the extent that
 6 it seeks the production of information protected by the attorney-client privilege, the work-product
 7 doctrine, and/or any other applicable privilege, immunity, or protection.

8 Based on these objections, Meta will not search for and produce the requested documents.

9 **REQUEST NO. 185:**

10 All Documents related to the “error” that caused some users on the Instagram Platform to see
 11 graphic or violent content on or about Feb. 26, 2025, including, but not limited to, all Documents related
 12 to the age of the affected users, Meta’s efforts to prevent this “error,” Meta’s risk assessments related to
 13 the “error,” and Meta’s investigation of this “error.”

14 **RESPONSE:**

15 Meta objects to this Request as overly broad, vague, and lacking specificity, seeking information
 16 not relevant to the claims and defenses in the case, unduly burdensome, and not proportional to the needs
 17 of the case, including because it seeks “[a]ll Documents related to the ‘error’ that caused some users on
 18 the Instagram Platform to see graphic or violent content on or about Feb. 26, 2025” without connection to
 19 the claims in this case or regard to whether the requested documents concern Youth or Youth mental
 20 health, and relate to a period of time beyond the Relevant Time Period. This Request does not relate to
 21 new developments, facts or issues that are relevant to these cases, within the contemplation of DMO 7.
 22 See Statement and Objection to All Requests No. 19. Meta further objects to this Request as overly broad,
 23 unduly burdensome, and not proportional to the needs of the case to the extent it requires extensive and
 24 highly burdensome data analysis and extraction. Meta further objects to this Request to the extent that it
 25 seeks information that Meta does not maintain in the ordinary course of business in the form requested,
 26 that does not exist or is not in Meta’s possession, and/or that would be unduly burdensome and not
 27 proportional to the needs of the case to provide. Meta further objects to the Request to the extent that it
 28

1 seeks the production of information protected by the attorney-client privilege, the work-product doctrine,
2 and/or any other applicable privilege, immunity, or protection.

3 Based on these objections, Meta will not search for and produce the requested documents.

4 **REQUEST NO. 186:**

5 All Communications, if any, between Meta and any former employees of Meta, or such employees’
6 representatives, relating to this action or the subject matter of this action.

7 **RESPONSE:**

8 Meta objects to this Request as overly broad, vague, and lacking specificity, seeking information
9 not relevant to the claims and defenses in the case, unduly burdensome, and not proportional to the needs
10 of the case, including because it seeks “[a]ll Communications, if any, between Meta and any former
11 employees of Meta, or such employees’ representatives, relating to this action or the subject matter of this
12 action” broadly “relating to” this action, without specificity, and without limitation to the Relevant Time
13 Period. Meta further objects to this Request as vague and ambiguous, including with respect to the phrases
14 “former employees of Meta” and “employees’ representatives.” Meta further objects to this Request as
15 overly broad, unduly burdensome, and not proportional to the needs of the case, and duplicative of
16 previously-served discovery, as Meta already has searched the 127 agreed-upon custodians’ documents
17 for communications that discuss Youth or one or more of the features or alleged addictive/compulsive use
18 or harms to mental health. As such, responsive communications with former employees would have been
19 captured by that search. Meta further objects to this Request to the extent it seeks information that may
20 not exist in the normal course of business. Meta further objects to the Request to the extent that it seeks
21 the production of information protected by the attorney-client privilege, the work-product doctrine, and/or
22 any other applicable privilege, immunity, or protection.

23 Based on these objections, Meta will not search for and produce the requested documents.

24 **REQUEST NO. 187:**

25 With respect to META3047MDL-095-00000001 through META3047MDL-095-00000003, all
26 data dictionaries, decoding documents, lists, and definitions for each table, field, entry code, or value, and
27 indicating the underlying assumptions, parameters, and source data.

RESPONSE:

Meta objects to this Request as overly broad, vague, and lacking specificity, seeking information not relevant to the claims and defenses in the case, unduly burdensome, and not proportional to the needs of the case, including because it seeks “all data dictionaries, decoding documents, lists, and definitions for each table, field, entry code, or value, and indicating the underlying assumptions, parameters, and source data” with respect to the referenced production number range without connection to the claims in this case or regard to whether the documents concern Youth or Youth mental health. Meta further objects to this Request to the extent it seeks information that may not exist in the normal course of business. Meta further objects to the Request to the extent that it seeks the production of information protected by the attorney-client privilege, the work-product doctrine, and/or any other applicable privilege, immunity, or protection. Meta further objects to this Request as duplicative of the Personal Injury Plaintiffs’ Interrogatory No. 3.

Subject to and without waiving these objections, Meta states that it already has provided responsive information and documents in response to Plaintiffs’ duplicative Interrogatory No. 3 and will not search for and produce additional documents in response to this Request.

1 Dated: April 3, 2025

Respectfully submitted,

2
3 **COVINGTON & BURLING LLP**

4 /s/ Ashley M. Simonsen

5 Ashley M. Simonsen (State Bar No. 275203)

6 asimonsen@cov.com

7 COVINGTON & BURLING LLP

1999 Avenue of the Stars

Los Angeles, CA 90067

Telephone: (424) 332-4800

8 Facsimile: + 1 (424) 332-4749

9 Mark W. Mosier, *pro hac vice*

10 mmosier@cov.com

11 Paul W. Schmidt, *pro hac vice*

12 pschmidt@cov.com

13 Phyllis A. Jones, *pro hac vice*

14 pajones@cov.com

15 COVINGTON & BURLING LLP

16 One CityCenter

850 Tenth Street, NW

Washington, DC 20001-4956

17 Telephone: + 1 (202) 662-6000

18 Facsimile: + 1 (202) 662-6291

19 Emily Johnson Henn (State Bar No. 269482)

20 ehenn@cov.com

21 COVINGTON & BURLING LLP

3000 El Camino Real

5 Palo Alto Square, 10th Floor

Palo Alto, CA 94306

22 Telephone: + 1 (650) 632-4700

23 Facsimile: +1 (650) 632-4800

24 *Attorneys for Defendants Meta Platforms, Inc. f/k/a*
25 *Facebook, Inc.; Facebook Holdings, LLC;*
26 *Facebook Operations, LLC; Facebook Payments,*
27 *Inc.; Facebook Technologies, LLC; Instagram,*
28 *LLC; Siculus, Inc.; and Mark Elliot Zuckerberg*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail on April 3, 2025 on the following:

PSCServiceMDL3047@motleyrice.com

~SnapMDL3047JCCP5255@mto.com

john.beisner@skadden.com

YT-MDL3047JCCP5255@list.wsgr.com

YT-ML-MDL3047JCCP5255@morganlewis.com

W&C-YT-PL-Cases@wc.com

TikTokMDL3047JCCP5255@faegredrinker.com

TikTokMDL3047JCCP5255@kslaw.com

SM.MDLAGLeads@coag.gov

mdl3047coleadfirms@listserv.motleyrice.com

Defendants-MDL3047JCCP5255@skaddenlists.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on April 3, 2025.

2
3 DATED: April 3, 2025

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen