AMENDED Exhibit 1

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

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

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' RESPONSES AND OBJECTIONS TO PLAINTIFFS' THIRD SET OF REQUESTS FOR ADMISSION**

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 responses and objections to Plaintiffs' Third Set of Requests for Admission ("Requests") served on February 21, 2025.

Meta's responses to the Requests are made to the best of its current knowledge, information, and belief. Meta reserves the right to further supplement or amend any of its responses should future investigation indicate that such supplementation or amendment is necessary.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta ADMITS it reported $164,501 (in millions) in total revenue for the year ended December 31, 2024 on its United States Securities and Exchange Commission Form 10-K for the fiscal year ended December 31, 2024. *See, e.g.,* United States Securities and Exchange Commission Form 10-K for Meta Platforms, Inc. for the fiscal year ended December 31, 2024 at 71.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 26:

Admit that for fiscal year 2024, Meta reported $69,380,000,000.00 in net revenues to the Securities & Exchange Commission.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases "fiscal year 2024" and "net revenue" renders this Request vague and ambiguous.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta DENIES this Request for Admission.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 27:

Admit that for fiscal year 2024, Meta reported $5,070,000,000.00 in dividends to the Securities & Exchange Commission.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or

Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases "fiscal year 2024" and "dividends" renders this Request vague and ambiguous.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta DENIES this Request for Admission. Meta admits it reported total dividends and that dividend equivalents paid were $5.07 billion for the year ended December 31, 2024 on its United States Securities and Exchange Commission Form 10-K for the fiscal year ended December 31, 2024. *See, e.g.,* United States Securities and Exchange Commission Form 10-K for Meta Platforms, Inc. for the fiscal year ended December 31, 2024 at 78.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 28:

Admit that for fiscal year 2024, Meta reported $52,103,000,000.00 in free cash flow to the Securities & Exchange Commission.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases "fiscal year 2024" and "free cash flow" renders this Request vague and ambiguous. Meta defines "Free Cash Flow" as net cash provided by operating activities reduced by purchases of property and equipment and principal payments on finance leases. *See* United States Securities and Exchange Commission Form 10-K for Meta Platforms, Inc. for the fiscal year ended December 31, 2024 at 77.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Meta ADMITS it reported $52,103 (in millions) in Free Cash Flow for the year ended December 31, 2024 on its United States Securities and Exchange Commission Form 10-K for the fiscal year ended December 31, 2024. *See, e.g.,* United States Securities and Exchange Commission Form 10-K for Meta Platforms, Inc. for the fiscal year ended December 31, 2024 at 77.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 29:

Admit that for fiscal year 2024, Meta reported $62,360,000,000.00 in profits to the Securities & Exchange Commission.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases "fiscal year 2024" and "profits" renders this Request vague and ambiguous.

Based on, subject to, and without waiving the foregoing objections, Meta responds as follows: Except as expressly set out below, Meta DENIES this Request for Admission. Meta admits it reported $62,360 (in millions) in net income for the year ended December 31, 2024 on its United States Securities and Exchange Commission Form 10-K for the fiscal year ended December 31, 2024. *See, e.g.,* United States Securities and Exchange Commission Form 10-K for Meta Platforms, Inc. for the fiscal year ended December 31, 2024 at 71.

Meta reserves the right to supplement or modify its response based upon documents or information identified over the course of discovery.

REQUEST FOR ADMISSION NO. 30:

Admit that prior to the launch of Teen Accounts in September 2024, Instagram Platform did not default all Users under 16 years old into the platform's strictest User Control settings.

RESPONSE:

Meta incorporates its Responses and Objections to All Requests by reference as though fully set forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases "default" and "strictest User Control settings" renders this Request vague and ambiguous.

Dated: April 1, 2025

Respectfully submitted,

COVINGTON & BURLING LLP

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail on April 1, 2025 on the following:

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

DATED: April 1, 2025 By: *<u>/s/ Ashley M. Simonsen</u>*

Ashley M. Simonsen