

AMENDED Exhibit 160

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

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

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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Operations, LLC; Facebook Payments, Inc.;
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Siculus, Inc.; and Mark Elliot Zuckerberg
Additional 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

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.

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1 limited to the following statements from the BBC article referenced in this Request: “Facebook said earlier
2 that it was (1) ‘deeply sorry’ and that graphic content (2) ‘has no place on our platform.’”

3 Based on, subject to, and without waiving the foregoing objections, Meta responds as follows:
4 except as expressly admitted below, Meta DENIES this Request for Admission. Meta admits that in
5 response to a January 27, 2019 Sunday Times article accusing tech companies of pushing teens to suicide,
6 Facebook issued a statement that stated, in part, that “[n]othing is more important to us than the safety of
7 the people in our community, and we work with experts every day to best understand the ways to keep
8 them safe. We do not allow content that promotes or encourages eating disorders, self-harm or suicide
9 and use technology to find and remove it. Mental health and self-harm are complex and nuanced issues,
10 and we work with expert groups who advise us on our approach. They tell us that the sharing of a person’s
11 mental health struggle or connecting with others who have battled similar issues, can be an important part
12 of recovery. This is why we don’t remove certain content and instead offer people looking at, or posting
13 it, support messaging that directs them to groups that can help.”

14 Meta further admits that in a January 23, 2019 BBC News at Six interview covering the Molly
15 Russell incident and removing harmful content on social media, Facebook’s Vice-President of Northern
16 Europe Steve Hatch stated “I’m deeply sorry for how this must have been such a devastating event for
17 their family and anybody and everyone that I have spoken to feels exactly the same” and “[i]f people are
18 posting in order to seek help, in order to seek support from communities, the experts in this area tell us
19 that is a valuable thing for them to do and can help with recovery and can help with support. If it is there
20 to sensationalize or glamorize, of course it has no place on our platform, it shouldn’t be on our platform,
21 and if we need to work harder to make sure that it isn’t on our platform then we certainly will.”

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

24 **REQUEST FOR ADMISSION NO. 39:**

25 Admit that the statements attributed to a Facebook spokesperson in the following article were made
26 by a Meta employee authorized to speak on Meta’s behalf: Lauren Feiner, More than 40 attorneys general
27 ask Facebook to abandon plans to build Instagram for kids, CNBC (May 10, 2021),
28

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1 [https://www.cnbc.com/2021/05/10/attorneys-general-ask-facebook-to-abandon-instagram-for-kids-](https://www.cnbc.com/2021/05/10/attorneys-general-ask-facebook-to-abandon-instagram-for-kids-plans.html)
2 [plans.html](https://www.cnbc.com/2021/05/10/attorneys-general-ask-facebook-to-abandon-instagram-for-kids-plans.html).

RESPONSE:

3
4 Meta incorporates its Responses and Objections to All Requests by reference as though fully set
5 forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the
6 needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or
7 Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases
8 “attributed to,” “employee,” “authorized to speak,” and “Meta’s behalf” renders this Request vague and
9 ambiguous. For purposes of responding to this Request, Meta construes “statements attributed to a
10 Facebook spokesperson” as limited to the following statements from the CNBC article referenced in this
11 Request: Facebook (1) “just started exploring a version of Instagram for kids”; (2) “[and committed to not
12 show ads] in any Instagram experience we develop for people under the age of 13”; (3) “[w]e agree that
13 any experience we develop must prioritize their safety and privacy, and we will consult with experts in
14 child development, child safety and mental health, and privacy advocates to inform it. We also look
15 forward to working with legislators and regulators, including the nation’s attorneys general”; and (4)
16 “[w]e want to improve this situation by delivering experiences that give parents visibility and control over
17 what their kids are doing. We are developing these experiences in consultation with experts in child
18 development, child safety and mental health, and privacy advocates.”

19 Based on, subject to, and without waiving the foregoing objections, Meta responds as follows:
20 Except as expressly admitted below, Meta DENIES this Request for Admission. Meta admits that in
21 response to a May 10, 2021 Press Release from the New York Attorney General urging Facebook to
22 abandon its launch of Instagram Kids, Facebook stated that “[w]e’ve just started exploring a version of
23 Instagram for kids. We agree that any experience we develop must prioritize their safety and privacy, and
24 we will consult with experts in child development, child safety and mental health, and privacy advocates
25 to inform it. We also look forward to working with legislators and regulators, including the nation’s
26 attorneys general. In addition, we commit today to not showing ads in any Instagram experience we
27 develop for people under the age of 13.” Meta further admits that in response to a May 18, 2021 letter
28 from Senators Edward Markey and Richard Blumenthal and Representatives Kathy Castor and Lori

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1 Trahan calling on Facebook to abandon its plans for Instagram Kids, Facebook released a statement stating
2 “[a]s every parent knows, kids are already online. We want to improve this situation by delivering
3 experiences that give parents visibility and control over what their kids are doing. We will develop these
4 experiences in consultation with experts in child development, child safety and mental health, and privacy
5 advocates. We also look forward to working with legislators and regulators. In addition, we commit to
6 not showing ads in any Instagram experience we develop for people under the age of 13.”

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

REQUEST FOR ADMISSION NO. 40:

9
10 Admit that the statements attributed to [REDACTED], Meta, and “a Meta executive” in the
11 following article were made by Meta employees authorized to speak on Meta’s behalf: Adam Satariano,
12 British Ruling Pins Blame on Social Media for Teenager’s Suicide, N.Y. Times (Oct. 1, 2022),
13 <https://www.nytimes.com/2022/10/01/business/instagram-suicide-ruling-britain.html>.

RESPONSE:

14
15 Meta incorporates its Responses and Objections to All Requests by reference as though fully set
16 forth herein. Meta objects to this Request as overbroad, unduly burdensome, and not proportional to the
17 needs of the case to the extent that it seeks information without limitation to the Relevant Time Period or
18 Youth users. Meta further objects to this Request on the ground that its use of the undefined phrases
19 “attributed to,” “employees,” “authorized to speak,” and “Meta’s behalf” renders this Request vague and
20 ambiguous. For purposes of responding to this Request, Meta construes “statements attributed to
21 [REDACTED]” as limited to the following statements from the N.Y. Times article referenced in this
22 Request: “I cannot speak to what was in Molly’s head.” To the extent that this Request asks for
23 confirmation of “statements attributed to [] a Meta executive” that are identical to the “statements
24 attributed to [REDACTED],” Meta objects to this Request as duplicative. Meta further construes
25 “statements attributed to [] Meta” as limited to the following statements from the N.Y. Times article
26 referenced in this Request: Meta’s “thoughts are with the Russell family” and Meta is “committed to
27 ensuring that Instagram is a positive experience for everyone, particularly teenagers.”
28

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Dated: April 1, 2025

Respectfully submitted,

COVINGTON & BURLING LLP

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