

AMENDED Exhibit 270

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

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 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' SEVENTH
SUPPLEMENTAL AND AMENDED
RESPONSES AND OBJECTIONS TO
PLAINTIFFS' SECOND SET OF
INTERROGATORIES**

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 supplemental responses and objections to Plaintiffs' Second Set of Interrogatories ("Interrogatories") served on September 27, 2024.

Meta's responses to the Interrogatories 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.

HIGHLY CONFIDENTIAL (COMPETITOR)**INTERROGATORIES****INTERROGATORY 6:**

For each month in the Relevant Time Period, identify by decile the Time Spent Per Day by users of each platform in each State, broken out as follows: in total, of Unidentified Age, of each Reported Age between 0 and 100, and of each inferred Age between 0 and 100.

SUPPLEMENTAL RESPONSE:

Meta incorporates by reference its November 27, 2024 Responses and Objections to Plaintiffs' Second Set of Interrogatories and, in particular, its Statements and Objections to All Interrogatories, Objections to Defined Terms and Instructions, and specific objections to Interrogatory No. 6, and its March 14, 2025 and April 4, 2025 Supplemental Responses and Objections to Plaintiffs' Second Set of Interrogatories as if fully set forth herein.

Subject to and without waiving the foregoing objections, Meta provides the following supplemental response to Interrogatory No. 6:

Meta incorporates and refers to the spreadsheets produced at Bates META3047MDL_VOL225-00000001_HIGHLY CONFIDENTIAL. Specifically, these spreadsheets show the average daily time spent on Facebook per day for users ages 13-17 for each month between February 16, 2013 and March 31, 2024, broken down by state, by certain percentiles, and by the following age data, to the extent it is available: (1) accountholder's stated age; (2) accountholder's age as predicted by Meta's single-age estimation; and (3) whether the accountholder was predicted by Meta to be a teen, as opposed to a non-teen, per Meta's Adult Classifier model. These spreadsheets also show, for Facebook, the average daily time spent for United States users ages 18-30 with the same age breakdowns.

Meta's response to the Interrogatory and the data provided is subject to the information and qualifications set forth in the April 17, 2025 cover letter associated with that production.

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

INTERROGATORY 12:

For each month in the Relevant Time Period, identify the percentage rate of adoption for each Safety Feature by users of each platform in each State, broken out as follows: in total, of Unidentified Age, of each Reported Age between 0 and 100, and of each Inferred Age between 0 and 100. To the

HIGHLY CONFIDENTIAL (COMPETITOR)

1 extent a Safety Feature is made available only to non-users (i.e. parents or guardians) identify the
2 percentage rate of adoption as kept by You in the ordinary course of business.

SUPPLEMENTAL RESPONSE:

4 Meta incorporates by reference its November 27, 2024 Responses and Objections to Plaintiffs'
5 Second Set of Interrogatories and, in particular, its Statements and Objections to All Interrogatories,
6 Objections to Defined Terms and Instructions, and specific objections to Interrogatory No. 12, and its
7 December 21, 2024, March 14, 2025, and April 4, 2025 Supplemental Responses and Objections to
8 Plaintiffs' Second Set of Interrogatories as if fully set forth herein.

9 Subject to and without waiving the foregoing objections, Meta provides the following
10 supplemental response to Interrogatory No. 12:

11 Meta provides information and percentage rates of use or adoption for the following safety
12 tools:

- 13 • **Hide Likes & Views:** [REDACTED] of Youth users predicted to reside in the U.S. used
14 the Hide Likes & Views settings to hide likes or views on their post on Instagram
15 between January 8, 2023 and March 23, 2025.
- 16 • **Turn Off Commenting:** [REDACTED] of Youth users predicted to reside in the U.S. had
17 Turned Off Commenting enabled on a post on Instagram between March 23, 2025
18 and March 24, 2025.
- 19 • **Take a Break:** [REDACTED] of Youth users predicted to reside in the U.S. had Take a
20 Break enabled on Instagram between January 8, 2023 and September 24, 2024.
21 The Take a Break tool was consolidated into the Daily Limit tool on September
22 24, 2024 to simplify the time management features available to Youth users. This
23 process began taking effect on September 17, 2024. As such, the percentage of use
24 or adoption includes a period of time where the feature was no longer available to
25 some users.

26 Meta does not maintain data for use or adoption of **Favorites** in the ordinary course of
27 business. As such, Meta will not provide a percentage rate of use or adoption for **Favorites**.

HIGHLY CONFIDENTIAL (COMPETITOR)

Dated: April 17, 2025

Respectfully submitted,

COVINGTON & BURLING LLP

/s/ Ashley M. Simonsen

Ashley M. Simonsen (State Bar No. 275203)

asimonsen@cov.com

COVINGTON & BURLING LLP

1999 Avenue of the Stars

Los Angeles, CA 90067

Telephone: (424) 332-4800

Facsimile: + 1 (424) 332-4749

Emily Johnson Henn (State Bar No. 269482)

ehenn@cov.com

COVINGTON & BURLING LLP

3000 El Camino Real

5 Palo Alto Square, 10th Floor

Palo Alto, CA 94306

Telephone: + 1 (650) 632-4700

Facsimile: +1 (650) 632-4800

Phyllis A. Jones, *pro hac vice*

pajones@cov.com

Paul W. Schmidt, *pro hac vice*

pschmidt@cov.com

Michael X. Imbroscio, *pro hac vice*

mimbroscio@cov.com

COVINGTON & BURLING LLP

One CityCenter

850 Tenth Street, NW

Washington, DC 20001-4956

Telephone: + 1 (202) 662-6000

Facsimile: + 1 (202) 662-6291

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

HIGHLY CONFIDENTIAL (COMPETITOR)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail on April 17, 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.com

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 17, 2025

DATED: April 17, 2025

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen

VERIFICATION

I, [REDACTED], am a Data Scientist at Meta. I am authorized to make this Verification for and on behalf of Meta. I have read META'S SUPPLEMENTAL OBJECTIONS & RESPONSES TO PLAINTIFFS' SECOND SET OF INTERROGATORIES, Interrogatory 6, 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 16th day of April, 2025, in San Mateo, CA.

/s/

[REDACTED]
[REDACTED]

VERIFICATION

I, [REDACTED], am a Data Science Manager at Meta. I am authorized to make this Verification for and on behalf of Meta. I have read META'S SUPPLEMENTAL OBJECTIONS & RESPONSES TO PLAINTIFFS' SECOND SET OF INTERROGATORIES, Interrogatory 12, 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 16th day of April, 2025, in San Francisco, CA.

/s/ [REDACTED]
[REDACTED]