

AMENDED Exhibit 283

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' FOURTH
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 4:**

For each month in the Relevant Time Period, identify the Monthly Average Persons (“MAP”) and Monthly Average Users (“MAU”) 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. 4 as if fully set forth herein.

Subject to and without waiving the foregoing objections, Meta provides the following supplemental response to Interrogatory No. 4:

Meta incorporates and refers to the spreadsheets produced at Bates META3047MDL_VOL188-00000001_HIGHLY CONFIDENTIAL. Specifically, these spreadsheets show MAU ages 13-100+ on Instagram for the period February 18, 2018 through March 31, 2024 per month, broken down by state and by the following age data: (1) accountholder’s stated age; (2) accountholder’s age as predicted by Meta’s single-age estimation;¹ 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.²

Meta estimated the user’s location for an account using geographic prediction data separately for each month within the period identified. From February 6, 2024 to March 29, 2024, Meta does not have geographic prediction data for Instagram. For these dates, Meta used the predicted locations on March 30, 2024.

¹ For Instagram, single-age predictions are predicted by Meta’s Age Affinity model.

² This data shows the age(s) predicted for each account based on the results of a age prediction model(s) used by Facebook and Instagram for age verification. These predictions provide only an estimate of a user’s age and may not reliably reflect a user’s actual age. Meta’s Age Affinity and Adult Classifier models have different goals—namely, predicting an accountholder’s exact age and predicting whether an accountholder is or is not a teen, respectively. Meta considers [REDACTED]

Accordingly, Meta [REDACTED]. The Age Affinity model uses a number of inputs including [REDACTED]. The model provides only an estimate of a user’s age and is not necessarily a reflection of a user’s actual age.

HIGHLY CONFIDENTIAL (COMPETITOR)

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

INTERROGATORY 5:

For each month in the Relevant Time Period, identify by decile the Time Spent Per App Session for 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:

Per Plaintiffs' letter dated January 2, 2025, Meta understands that Plaintiffs revised this Interrogatory to state: "For each month in the Relevant Time Period, identify the Time Spent Per App Session for Super Users and/or Power 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."

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. 5 as if fully set forth herein. Meta further objects to the Revised Interrogatory on the additional ground that "Super Users and/or Power Users" is vague and ambiguous.

Subject to and without waiving the foregoing objections, Meta provides the following supplemental response to Interrogatory No. 5:

Meta incorporates and refers to the spreadsheets produced at Bates META3047MDL_VOL188-00000002_HIGHLY CONFIDENTIAL through META3047MDL-VOL188-00000003_HIGHLY CONFIDENTIAL. Specifically, for Instagram these spreadsheets show average Instagram session length for users ages 13-17 for each month between May 18, 2022 and March 31, 2024, broken down by state, by certain percentiles, and by the following age data: (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

HIGHLY CONFIDENTIAL (COMPETITOR)

show, for Instagram, the average session length for United States adult users with the same age breakdowns.

Meta estimated the user's location for an account using geographic prediction data separately for each day within the period identified. From February 6, 2024 to March 29, 2024, Meta does not have geographic prediction data. For these dates, Meta used the predicted locations on March 30, 2024.

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

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:

Per Plaintiffs' letter dated January 2, 2025, Meta understands that Plaintiffs revised this Interrogatory to state: "For each month in the Relevant Time Period, identify the Time Spent Per Day by Super Users and/or Power 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."

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 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_VOL188-00000004_HIGHLY CONFIDENTIAL through META3047MDL-VOL188-00000005_HIGHLY CONFIDENTIAL. Specifically, these spreadsheets show the average time spent per day on Instagram for users ages 13-17 for each month between February 18, 2018 and March 31, 2024, broken down by state, by certain percentiles, and by the following age data: (1) accountholder's stated age; (2) accountholder's

HIGHLY CONFIDENTIAL (COMPETITOR)

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 Instagram, the average time spent per day for United States adult users by the following age data: (1) accountholder's age as predicted by Meta's single-age estimation; and (2) whether the accountholder was predicted by Meta to be a non-teen, as opposed to a teen, per Meta's Adult Classifier model.

Meta estimated the user's location for an account using geographic prediction data separately for each day within the period identified. From February 6, 2024 to March 29, 2024, Meta does not have geographic prediction data. For these dates, Meta used the predicted locations on March 30, 2024.

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

INTERROGATORY 7:

For each month in the Relevant Time Period, identify by decile the Daily App Session Count for 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:

Per Plaintiffs' letter dated January 2, 2025, Meta understands that Plaintiffs revised this Interrogatory to state: "For each month in the Relevant Time Period, identify the Daily App Session Count for Super Users and/or Power 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."

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. 7 as if fully set forth herein.

Subject to and without waiving the foregoing objections, Meta provides the following supplemental response to Interrogatory No. 7:

HIGHLY CONFIDENTIAL (COMPETITOR)

Meta incorporates and refers to the spreadsheets produced at Bates META3047MDL_VOL188-00000006_HIGHLY CONFIDENTIAL through META3047MDL-VOL188-00000007_HIGHLY CONFIDENTIAL. Specifically, these spreadsheets show the average number of sessions on Instagram per day for users ages 13-17 for each month between May 18, 2022 and March 31, 2024, broken down by state, by certain percentiles, and by the following age data: (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 Instagram, the average session length for United States adult users with the same age breakdowns, based on a sample of US users.

Meta estimated the user's location for an account using geographic prediction data separately for each day within the period identified. From February 6, 2024 to March 29, 2024, Meta does not have geographic prediction data. For these dates, Meta used the predicted locations on March 30, 2024.

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

INTERROGATORY 8:

For each month in the Relevant Time Period, identify by decile the Typical Time Between App Sessions for 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:

Per Plaintiffs' letter dated January 2, 2025, Meta understands that Plaintiffs have withdrawn this Interrogatory.

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