

AMENDED Exhibit 308

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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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' NINTH
SUPPLEMENTAL 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.

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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.

INTERROGATORIES**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.

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. 12, and its December 21, 2024, March 14, 2025, April 4, 2025, and April 18, 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. 12:

Meta provides percentage rates of use or adoption among Instagram users predicted by Meta's Adult Classifier model to be Youth for the following safety tools:

- **Following:** 6.02% of users predicted to be Youth and predicted to reside in the U.S. used the "Following view" on Instagram between March 23, 2022 and April 1, 2024. This percentage does not include data between October 23, 2024 and October 25, 2024 because data from those dates is not available.

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- **Limit Notifications:** 0.26% of users predicted to be Youth and predicted to reside in the U.S. used notifications settings to limit notifications on Instagram between April 18, 2025 and May 7, 2025.
- **Take a Break:** 0.45% of users predicted to be Youth and predicted to reside in the U.S. had Take a Break enabled on Instagram between January 8, 2023 and September 24, 2024. The Take a Break tool was consolidated into the Daily Limit tool on September 24, 2024 to simplify the time management features available to users predicted to be Youth. This process began taking effect on September 17, 2024. As such, the percentage of use or adoption includes a period of time where the feature was no longer available to some users.

Meta provides the following supplemental information with respect to its prior responses to Interrogatory No. 12:

- Meta clarifies that the percentage rates of use or adoption it provided in its supplemental responses dated December 21, 2024, February 14, 2025, and April 4, 2025 were for Instagram users predicted to be Youth by Meta's Adult Classifier model.
- Meta amends the percentage rate of use or adoption for Family Center Supervision provided in its April 4, 2025 response, which noted incorrectly that the data reflects enrollment in Family Center Supervision among users predicted to be Youth on Instagram between March 23, 2025 and March 24, 2025. Meta corrects this description as follows: the Family Center percentage rate of use or adoption reflects enrollment in Family Center Supervision among users predicted to be Youth between November 9, 2023 and March 22, 2025.

Meta provides information and percentage rates of use or adoption among Facebook users predicted by Meta's Adult Classifier model to be Youth for the following safety tools:

Certain safety tools available to all users on Facebook allow users predicted to be Youth to control how other accounts interact with them on their posted content. Meta provides percentage rates of use or adoption for the following reachability tools:

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- **Turn Off Commenting:** 0.00% of users predicted to be Youth and predicted to reside in the U.S. used the Turn Off Commenting tool to disable commenting on their post on Facebook between February 19, 2025 and May 27, 2025.

- **Hide Reactions:** 1% of users predicted to be Youth and predicted to reside in the U.S. used the Hide Reactions feature to hide likes on their own posts on Facebook between April 20, 2025 and May 27, 2025. 0.4% of users predicted to be Youth and predicted to reside in the U.S. used the Hide Reactions feature to hide likes on other users' posts on Facebook between April 20, 2025 and May 27, 2025.

Certain safety tools available to all users on Facebook help users manage the amount of time they are spending on Facebook. Meta provides percentage rates of use or adoption for the following time spent tools:

- **Take a Break:** 16.3% of users predicted to be Youth and predicted to reside in the U.S. had Take a Break enabled on Facebook between June 2, 2024 and May 27, 2025.
- **Limit Notifications:** 7.5% of users predicted to be Youth and predicted to reside in the U.S. used Notification settings or Shortcuts settings to turn off their notifications on Facebook between February 20, 2025 and May 27, 2025.

Meta provides percentage rates of use or adoption for the following additional safety tools:

- **Family Center Supervision:** 0.15% of users predicted to be Youth and predicted to reside in the U.S. users were enrolled in supervision through Family Center on Facebook at some point between November 5, 2024 and May 27, 2025.
- **Teen Accounts:** 0.18% of users predicted to be Youth and predicted to reside in the U.S. were enrolled in Teen Accounts on Facebook between April 8, 2025 and May 27, 2025.

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Meta has provided user reporting data in productions responsive to the personal injury Plaintiffs' Request for Production No. 124 and the State Plaintiffs' Request for Production No. 102. As such, Meta will not provide percentage rates of use or adoption for **Live Video Reporting** and **Dedicated Option for Reporting Eating Disorder Content**.

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

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Dated: June 4, 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 June 4, 2025 on the following:

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I declare under penalty of perjury that the foregoing is true and correct. Executed on June 4, 2025.

DATED: June 4, 2025

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

VERIFICATION

I, [REDACTED], am Data Science Manager at Meta. I am authorized to make this Verification for and on behalf of Meta. I have read META'S NINTH SUPPLEMENTAL OBJECTIONS & RESPONSES TO PLAINTIFFS' SECOND SET OF INTERROGATORIES NO. 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 4th day of June, 2025, in San Francisco, CA.

/s/ [REDACTED]