

AMENDED Exhibit 582

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

August 22, 2025

MEYERS
EXHIBIT**015**

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

**IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION,**

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

MDL No. 3047

THIS DOCUMENT RELATES TO:

Irvington Public Schools v. Meta Platforms
Inc., et al.

Member Case No.: 4:23-cv-1467

**PLAINTIFF'S THIRD AMENDED
ANSWERS TO DEFENDANTS'
INTERROGATORIES
TO IRVINGTON PUBLIC SCHOOLS
(SET 3)**

PROPOUNDING PARTY: DEFENDANTS

RESPONDING PARTY: IRVINGTON PUBLIC SCHOOLS

SET No.: THREE (3)

DATE OF SERVICE: MAY 14, 2025

Pursuant to Federal Rules of Civil Procedure 26 and 33 and the Local Rules of this judicial district, Plaintiff Irvington Public Schools ("Plaintiff"), hereby provides these responses and objections to the Defendants' Interrogatories to Plaintiff Irvington Public Schools (Set 3) (the "Request" or "Requests").

PRELIMINARY STATEMENT

Plaintiff has undertaken a reasonable effort to provide the information requested by these Interrogatories to the extent the requested information is not subject to objection, but Plaintiff has not yet received adequate or substantially complete discovery from Defendants, and Plaintiff has not completed its investigation of the facts relating to this Action. Discovery is ongoing and additional information may be obtained that may alter these responses. The following responses

1 and objections are based upon information that has been collected and reviewed to date for the
 2 purpose of these Interrogatories and are not prepared from any personal knowledge of any single
 3 individual. Accordingly, all the following responses are given without prejudice to, and with the
 4 express reservation of, Plaintiff's right to supplement or modify its responses and objections to
 5 address additional information, and to rely upon any and all such information and documents at
 6 trial or otherwise.

7 **OBJECTIONS TO DEFINITIONS**

8 The following applies to each Interrogatory.

9 1. Plaintiff objects to Defendants' definition of "You," "Your," and "Plaintiff," as
 10 overly broad, unduly burdensome, and seeking the production of information that is not relevant to
 11 the claims or defenses of any party, not proportional to the needs of the case, and not reasonably
 12 accessible to Plaintiff upon reasonable diligence. Furthermore, the definition of these terms is over
 13 broad to the extent it would require Plaintiff to respond to these Interrogatories for people
 14 "purporting to act on its behalf" and to the extent it purports to include any of the persons identified
 15 in their personal capacities rather than as officers and employees of Plaintiff. Plaintiff objects
 16 further to this definition as seeking Privileged Information because the definition includes
 17 Plaintiff's attorneys.

18 2. Plaintiff's answers are made without waiving its right to object (on the grounds of
 19 relevance, hearsay, materiality, competency, or any other ground) to the use of its responses in any
 20 subsequent stage or proceeding in this action or any other action.

21 3. If Plaintiff, in response to any Interrogatory, inadvertently produced information
 22 that is or could be the subject of the objections stated herein, such production is not intended to be,
 23 nor is it deemed to be, a waiver of the objections with respect to such information provided or
 24 withheld.

25 **RESPONSES TO INTERROGATORIES**

26 **INTERROGATORY NO. 5:**

27 For each category of damages listed in Your Second Supplemental Initial Disclosures: (a)
 28 describe what the category includes; (b) identify each cost or other input that You used in calculating

1 the claimed damages amount, and (c) explain how You calculated or arrived at the claimed damages
2 amount.

3 **RESPONSE:**

4 Plaintiff objects to the Interrogatory as premature to the extent it seeks information about
5 subjects of ongoing discovery, including expert discovery. Plaintiff's investigation is ongoing,
6 Plaintiff has not received sufficient discovery from Defendants as school-district specific
7 documents held by Defendants remain under negotiation and are yet to all be produced, and the
8 factual record is therefore incomplete. Plaintiff also objects to Interrogatory No. 5 as it is duplicative
9 of information Plaintiff already provided in its supplemental initial disclosures served pursuant to
10 Fed. R. Civ. P. Rule 26. Additionally, Plaintiff objects to Interrogatory No. 5 as it calls for an expert
11 opinion and solicits information that is privileged attorney work product and/or privileged attorney-
12 client communications. Plaintiff objects further to the Interrogatory as an impermissibly premature
13 contention interrogatory. Lastly, Plaintiff objects because the Interrogatory is compound, consisting
14 of multiple subparts relating to 1) descriptions of categories and subcategories 2) an explanation of
15 how the damages were calculated and 3) identifying costs, assumptions, and inputs used in
16 calculations for damages.

17 Subject to and without waiving the foregoing objections, Plaintiff incorporates its Rule 26
18 disclosures herein. Plaintiff further states that over the last several years, it has incurred increased
19 costs to combat the issues Defendants have caused throughout the District. Plaintiff has previously
20 provided a breakdown of the categories and subcategories of damages. Exhibits A and B, attached
21 hereto, details those categories and subcategories. Plaintiff is under no obligation to re-create or
22 provide work product to further define categories and subcategories for Defendants. Plaintiff
23 previously produced any non-privileged or protected documents upon which Plaintiff's preliminary
24 damages estimates in Plaintiffs' Second Supplemental Initial Disclosures were based. Said
25 disclosures speak for themselves, and Plaintiff currently has no further updates or additions to
26 respond to subpart (a). Plaintiff already provided the costs and inputs in response to subpart (b) and
27 currently has no further responsive information. Pursuant to Fed. R. Civ. P. 33, Plaintiff refers
28 Defendants to the documents produced by Plaintiff for both (a) and (b).

As to (c), Defendants' subpart improperly seeks disclosure of attorney-client privileged materials and attorney work product. Plaintiff stands on this objection and will not provide a response to subpart (c). As stated in prior responses, Plaintiff will make appropriate expert disclosures concerning damages categories, subcategories, explanations, and inputs sought by this Interrogatory (and through Rule 26 disclosure obligations) in accordance with the deadlines set by the Court and the Federal Rules of Civil Procedure. Plaintiff reserves the right to amend and/or supplement its response to the Interrogatory as more information becomes available through the discovery process.

Dated: May 14, 2025

By: /s/James E. Cecchi

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EXHIBIT A

RESOURCES CATEGORIES	VENDORS	2016	2017	2018	2019	2020	2021	2022	2023	2024	TOTAL
Dr. A. Vauss April 2020 forward						0.50	0.50	0.60	0.60	0.60	
						43,674.72	213,917.00	220,334.51	226,944.55	233,752.89	
						21,837.36	106,958.50	132,200.71	136,166.73	140,251.73	\$ 537,415.03
Teachers		0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	
Elementary		12,235,337.15	11,451,558.83	11,779,422.45	11,541,278.03	11,166,289.47	11,389,121.86	11,079,874.46	10,276,575.61	11,076,545.36	
		611,766.86	572,577.94	588,971.12	577,063.90	568,314.47	569,456.09	553,993.72	513,828.78	553,827.27	\$ 5,099,800.16
		0.10	0.10	0.10	0.10	0.15	0.20	0.20	0.20	0.20	
Art		1,122,395.00	861,687.82	867,641.45	826,396.19	953,930.59	883,143.95	787,258.56	825,889.49	738,412.50	
Bilingual Teacher & Subst & Kind		300,373.54	426,790.00	795,740.00	703,819.84	747,179.80	775,305.59	758,902.83	724,760.05	882,636.23	
Chemistry		909,672.44	875,051.22	779,941.92	159,416.53	923,500.81	824,542.45	749,894.72	847,258.49	843,303.89	
Computer		55,679.00	55,679.00	58,999.00	61,373.96	61,373.96	66,004.00	67,803.96	71,053.96	110,402.98	
Cosmetology		133,544.58	153,155.00	162,950.00	168,474.96	168,474.96	131,690.15	97,100.96	170,951.96	87,155.07	
Dance		3,619,850.36	3,406,217.25	3,182,445.45	3,525,924.53	3,754,069.09	4,076,313.71	4,504,311.89	5,649,477.17	5,700,924.26	
ELA/ELL/ESS/LAL		208,834.00	206,323.40	118,595.00	98,340.80	214,326.26	219,123.00	217,691.49	225,920.00	256,646.82	
INST. MUSIC		410,932.00	344,190.70	418,868.00	422,867.96	415,153.92	426,868.00	428,868.00	322,294.00	323,794.00	
GIFTED		2,477,298.39	2,452,992.00	2,515,214.42	2,690,763.90	2,747,598.91	2,900,336.77	3,272,096.51	3,734,140.10	3,533,278.13	
MATH		694,673.00	762,299.46	814,236.91	768,098.30	713,834.60	731,181.04	847,300.92	852,472.59	847,805.55	
MEDIA		2,018,956.10	1,853,100.36	1,861,812.96	1,905,501.66	1,991,680.55	2,147,837.50	2,144,225.98	2,114,225.98	2,245,821.42	
PHYS ED.		2,663,078.79	2,886,157.64	2,985,504.01	3,327,585.24	3,301,699.40	3,328,451.00	3,394,844.92	3,783,284.34	3,877,230.90	
PRE-K		-	-	-	-	-	-	-	-	-	
Relief Teacher	District	-	-	-	-	-	-	-	324,487.98	293,542.38	
SCIENCE		1,547,114.60	1,304,543.55	1,407,588.70	1,514,002.75	1,323,848.89	1,391,588.64	1,247,969.92	1,294,774.51	1,488,215.58	
SOCIAL STUDIES		1,474,716.34	1,258,856.92	1,361,306.10	1,466,109.85	1,412,845.76	1,462,204.13	1,533,248.07	1,498,354.94	1,484,458.94	
SPANISH										181,212.00	
SPECIAL ED.		4,530,435.05	4,770,961.14	4,952,321.59	5,348,936.70	5,465,367.63	5,654,210.44	5,665,569.27	6,531,078.87	5,958,706.68	
SPEECH		465,534.40	605,078.00	641,040.00	518,360.74	433,679.48	527,775.00	641,206.34	554,477.44	638,031.50	
VISUAL ARTS		113,625.00							56,061.77	35,557.00	
VOCAL MUSIC		953,483.91	810,262.50	829,743.10	731,328.96	834,556.48	901,462.80	944,404.54	800,720.81	470,211.00	
WORLD LANGUAGE		1,027,081.20	1,036,560.16	1,084,267.00	1,178,351.25	1,180,571.89	1,323,991.62	1,228,345.30	1,111,335.10		
Master Teacher		534,452.00	569,057.00	560,705.00	654,800.76	509,392.93	595,244.00	626,252.80	824,660.70	727,749.50	
		2,526,192.97	2,463,896.31	2,539,891.96	2,609,613.88	4,079,475.00	5,613,539.42	5,851,310.96	6,486,938.09	6,381,509.07	\$ 38,552,367.67
			0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	
Total Benefit Expenditure		14,266,806.68	17,052,211.27	16,347,571.03	16,144,938.74	21,742,334.96	17,175,516.17	21,355,522.74	18,741,966.49	18,741,966.49	
		713,340.33	852,610.56	817,378.55	807,246.94	1,087,116.75		858,775.81	1,067,776.14	937,097.82	\$ 7,141,342.90
Student Behavior/School Disruption								0.35	0.35	0.35	
Technicians		0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.35	0.35	
	District	250,034.23	324,260.71	308,395.75	237,887.40	397,136.02	488,654.20	441,251.54	563,025.05	576,392.47	
		87511.9805	113491.2485	107938.5125	83260.59	138997.607	171028.97	154438.039	197058.7675	201737.3645	\$ 1,255,463.08
Tech. Coordinators	District	379,154.60	482,586.08	573,187.00	543,162.34	553,512.00	571,847.25	878,793.71	933,601.82	997,187.50	
		0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	
		113,746.38	144,775.82	171,956.10	162,948.70	166,053.60	171,554.18	263,638.11	280,080.55	299,156.25	\$ 1,773,909.69
School Security Officers	District	2,210,428.32	2,381,265.54	2,323,136.30	2,513,271.25	2,719,324.21	2,627,476.26	2,522,740.53	2,831,996.99	2,881,108.42	
		0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	0.30	
School Resource Officers	Irvington Township	663,128.50	714,379.66	696,940.89	753,981.38	815,797.26	788,242.88	756,822.16	849,599.10	864,332.53	\$ 6,903,224.35
Mental/Behavioral Health		115,000.00	115,000.00	108,100.00	115,000.00	80,500.00	-	-	-	-	\$ 533,600.00
Behaviorist	District	0.10	0.10	0.10	0.15	0.15	0.15	0.20	0.25	0.25	
		68,290.00		69,210.00	73,084.96	73,084.96	79,515.00	100,017.49	342,097.46	462,936.00	
Total		6,829.00		6,921.00	10,962.74	10,962.74	11,927.25	20,003.90	85,524.37	115,734.00	\$ 268,864.60
Culture and Climate											
Principal	District	1,213,525.48	1,423,302.96	1,500,227.05	1,534,502.03	1,620,576.74	1,496,516.85	1,647,575.02	1,868,621.59	1,885,653.44	
		0.30	0.30	0.40	0.50	0.50	0.60	0.75	0.80	0.80	
Assistant Principal	District	364,057.64	426,990.89	600,090.82	767,251.02	814,788.37	897,909.99	1,235,681.27	1,494,897.27	1,508,522.75	\$ 8,110,190.02
		859,771.64	734,575.00	778,922.31	952,765.96	1,051,654.39	1,106,365.82	900,125.84	1,047,734.56	1,302,595.12	
		0.30	0.30	0.40	0.50	0.50	0.60	0.75	0.80	0.80	
Data/School Dean/Climate Specialist	District	257,931.49	220,372.50	311,568.92	476,382.78	525,827.20	663,819.49	675,094.38	838,187.65	1,042,076.10	\$ 5,011,260.51
		317,665.00	290,925.25	384,451.56	369,097.20	360,381.56	369,137.24	353,940.45	428,984.52	536,630.50	
		0.25	0.30	0.45	0.45	0.55	0.65	0.75	0.85	0.85	
		79,416.25	87,277.58	173,003.20	166,093.74	198,209.86	239,939.21	265,455.34	364,636.84	456,136.93	\$ 2,030,167.94
School Social Worker	District	1,054,762.00	982,562.16	1,064,744.00	1,031,106.98	1,029,098.41	1,099,101.52	932,473.12	1,086,567.84	1,192,483.00	
		0.25	0.30	0.45	0.45	0.55	0.65	0.75	0.85	0.85	
		263,690.50	294,768.65	479,134.80	463,998.14	566,004.13	714,415.99	699,354.84	923,582.66	1,013,610.55	\$ 5,418,560.26
Guidance Counselor/HSSC	District	2,499,019.99	2,212,154.21	2,542,967.41	2,502,254.47	2,370,030.58	2,464,228.91	2,573,029.54	2,717,374.78	2,877,744.18	
		0.25	0.30	0.45	0.45	0.55	0.65	0.75	0.85	0.85	
		624,755.00	663,646.26	1,144,335.33	1,126,014.51	1,303,516.82	1,601,748.79	1,929,772.16	2,309,768.56	2,446,082.55	\$ 13,149,639.99
Psychologist	District	614,570.50	610,855.10	660,573.95	734,747.00	765,317.88	849,827.62	848,746.01	782,310.53	766,212.02	
		0.15	0.15	0.20	0.25	0.30	0.40	0.40	0.50	0.50	
School Nurse	District	92,185.58	91,628.27	132,114.79	183,686.75	229,595.36	339,931.05	339,498.40	391,155.27	383,106.01	\$ 2,182,901.47
		1,173,779.00	1,286,548.55	1,367,241.75	1,339,598.99	1,359,259.38	1,212,930.00	1,165,293.96	1,116,318.19	1,573,209.00	
		0.05	0.05	0.05	0.05	0.05	0.10	0.10	0.20	0.20	
		58,688.95	64,327.43	68,362.09	66,979.95	67,962.97	121,293.00	116,529.40	223,263.64	314,641.80	\$ 1,102,049.22
Special Services											
Special Service Director	District	168,657.15	235,503.00	203,005.25	209,728.65	226,023.81	232,804.52	213,904.77	223,762.92	366,158.83	
		0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	0.20	
		33,731.43	47,100.60	40,601.05	41,945.73	45,204.76	46,560.90	42,780.95	44,752.58	73,231.77	\$ 415,909.78
Blue Knights/ Academy	District	119,389.00	121,776.00	124,760.00	127,878.00	130,848.00	-	-	-	-	
Alternative School ERES		278,897.00	366,720.00	332,814.00	330,110.00	330,110.00	679,843.00	1,200,444.00	935,124.00	306,369.00	
		0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	
		107,450.10	360,605.70	442,332.00	414,622.80	414,952.20	611,858.70	1,080,399.60	841,611.60	275,732.10	\$ 4,549,564.80
Public/Stakeholder/Community Outreach		0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	
Community/Family Advocate Specialist	District	119,446.28	121,835.21	125,002.92	128,503.00	65,761.48	102,372.50	89,084.91	106,731.72	111,000.99	\$ 969,739.01
Parent Coordinators	District	214,828.60	197,097.46	198,282.33	193,935.50	230,605.18	175,167.73	199,529.46	210,755.44	204,943.71	\$ 1,825,145.41

EXHIBIT B

Costs Associated with the Harms Alleged in the Complaint for Expenditures on External Programs and Services			
Vendor	Approximate Total Spend	Percent Allocation to Harms	Approximate Costs of Harms
New Jersey Coalition for Inclusive Education	\$1,043,432.00	20%	\$208,686.40
Care Plus NJ, Inc.	\$2,513,686.00	20%	\$502,737.20
Brett Dinovi & Associates LLC	\$1,132,333.71	20%	\$226,466.74
GoGaurdian	\$129,625.00	35%	\$45,368.75
Palo Alto	\$140,000.00	35%	\$49,000.00
Live Breach Calm	\$100,000.00	20%	\$20,000.00
Generations Family Guidance, LLC	\$300,000.00	20%	\$60,000.00
Center for Partnership Services	\$776,531.25	20%	\$155,306.25
Momentum Therapy Services, LLC	\$350,000.00	20%	\$70,000.00
			\$1,337,565.34

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2025, a true and correct copy of the foregoing Plaintiff's Responses and Objections to Defendants' Requests for Production of Documents to Irvington Public Schools (Set 3) was served on the following by electronic mail:

- defendants-MDL3047JCCP5255@skaddenlists.com; MetaNoticeofService@cov.com;
- SnapNoticeofService@mta.com;
- TikTokNoticeofService@faegredrinker.com;
- SERVICE-YOUTUBE-INRESOCIALMEDIAM@LIST.WSGR.COM; and
SMMDLSchoolDistrictBellwetherGroup@lfsblaw.com.

Dated: May 14, 2025

By: /s/James E. Cecchi

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