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EXHIBIT F

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FIRST JUDICIAL DISTRICT COURT

**COUNTY OF SANTA FE
STATE OF NEW MEXICO**

STATE OF NEW MEXICO, EX REL.
RAÚL TORREZ, ATTORNEY GENERAL,

Plaintiff,

v.

NO. D-101-CV-2023-02838

META PLATFORMS, INC.;
INSTAGRAM, LLC;
META PAYMENTS, INC.; and
META PLATFORMS TECHNOLOGIES, LLC,

Defendants.

**DEFENDANTS' OBJECTIONS AND RESPONSES TO PLAINTIFF'S THIRD SET OF
INTERROGATORIES TO DEFENDANTS**

Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., and Meta Platforms Technologies, LLC (collectively "Meta"), by and through their attorneys, Holland & Hart LLP and Covington & Burling LLP, hereby provide Objections and Responses to Plaintiff's Second Set of Interrogatories as follows. Meta's responses to the Interrogatories are made to the best of its current knowledge, information, and belief. Meta reserves the right to supplement or amend any of its responses and objections as appropriate as discovery and its investigation proceed.

RECURRING SPECIFIC OBJECTIONS

1. Meta objects to the Interrogatories to the extent they conflict with the Rules of Civil Procedure for the District Courts of New Mexico or the local rules of this Court ("Discovery

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produced responsive data at METANMAG-056-00001117 with respect to users Meta believed to be located in the United States. Meta is willing to meet and confer regarding whether there is additional non-privileged information responsive to this Interrogatory, to the extent any exists, that is proportionate to the needs of this case and not unduly burdensome for Meta to provide.

Interrogatory 34. For each calendar year within the applicable timeframe, identify the average number of minutes per day that Users spent on Your Products by age and sex, as well as the distribution of use of Your Products for these demographic categories (e.g., by decile), for New Mexico Users and for total United States Users.

RESPONSE: Meta incorporates its Recurring Specific Objections by reference as though fully set forth herein. Meta further objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent responding requires extensive and highly burdensome data analysis and extraction. Meta further objects to this Interrogatory on the ground and to the extent that it seeks information that Meta does not maintain in the ordinary course of business in the form requested and/or that does not exist or is not in Meta's possession. Meta objects to this Interrogatory as overly broad, seeking information not relevant to the claims and defenses in the case, unduly burdensome, and not proportional to the needs of the case to the extent it seeks "the average number of minutes per day that Users spent" on Meta Products "by age and sex" as well as "by decile," without connection to the claims in this case or regard to whether the requested documents concern Youth or Youth mental health. Rule 1-026(B)(2)(c); *see also Lara*, 1999-NMCA-012, ¶ 10 (discovery must be narrowly tailored to avoid irrelevant information); *Ruiz*, 1981-NMCA-094, ¶ 3 (interrogatories that are "exceedingly broad" are objectionable); *Archuleta*, 2005-NMSC-006, ¶ 23 ("a party will not be required to respond to an overly broad discovery request unless adequate guidance exists as to what extent the request is

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not objectionable.”). Meta further objects to this Interrogatory to the extent that it seeks detailed technical information or underlying data for which production, aggregation, and/or assortment would be highly burdensome and/or not proportional to the needs of the case. *See* Rule 1-026(B)(2)(c); *see also Lara*, 1999-NMCA-012, ¶ 10 (discovery must be narrowly tailored to avoid irrelevant information). Meta further objects to this Interrogatory to the extent that it is not limited to New Mexico. *See* Rule 1-026(B)(1). Meta further objects to this Interrogatory as overbroad, unduly burdensome, vague and ambiguous, not relevant to the claims and defenses in this action, and not proportional to the needs of the case insofar as it seeks excessive breakdowns of data.

Subject to and without waiving the foregoing objections, Meta provides the following response to Interrogatory No. 34: Meta has produced information under N.M. R. Civ. P. Dist. Ct. 1-033(E) from which answers responsive to this Interrogatory can be derived. Specifically, Meta has produced information about daily time spent on Instagram and Facebook by (i) New Mexico users (and users of all states and DC) ages 13-17 broken down by age and percentile, and (ii) United States adult users broken down by age, at METANMAG-044-00001457 to METANMAG-044-00001463 and METANMAG-056-00001124 to METANMAG-056-00001129. Meta is willing to meet and confer regarding whether there is additional non-privileged information responsive to this Interrogatory, to the extent any exists, that is proportionate to the needs of this case and not unduly burdensome for Meta to provide.

Interrogatory 35. For each calendar year within the applicable timeframe, identify the average number of advertisements seen per minute and per hour of Product use for Users by age, sex, and percentile of average time spent per day using Your Products (e.g., identify the number of advertisements seen per minute and per hour of Product use on average and for each decile of Users within the distribution of use), for New Mexico Users and for total United States Users.

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Dated: May 21, 2025

Submitted by,

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