

EXHIBIT 1

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
FIFTH SET OF INTERROGATORIES TO DEFENDANTS**

Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., and Meta Platforms Technologies, LLC (collectively "Meta" or "Defendants"), by and through their attorneys, Holland & Hart LLP and Covington & Burling LLP, hereby provide Objections and Responses to Plaintiff's Fifth 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 Rules"). See Rule 1-026(B) NMRA (defining the scope of permissible discovery).

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2. Meta objects to each Interrogatory to the extent that it seeks information protected from disclosure by any applicable privilege, doctrine, or immunity, including, without limitation, the attorney-client privilege, and the work product doctrine. *See* Rule 1-026(B)(1), (6), (7). Any disclosure of privileged or protected information, whether inadvertent or otherwise, is not intended to waive, nor shall it be deemed to waive, those privileges or protections. *Id.* Further, Meta construes the Interrogatories as not seeking production of information from counsel that constitutes attorney-client communications and/or work product generated in connection with this or other litigation or anticipated litigation. *See* Rule 1-033(C)(1).

3. Meta objects to the Interrogatories insofar as they seek contents of third-party communications maintained by Meta. The Stored Communications Act (SCA) prohibits providers of certain technology services from “knowingly divulg[ing]” the contents of communications maintained by the provider, 18 U.S.C. § 2702(a), subject to specific exemptions, *id.* § 2702(b); *see also* New Mexico Electronic Communications Privacy Act, NMSA 1978, § 10-16F-2(A)(1) (except by way of a warrant or wiretap order, “a government entity shall not . . . compel . . . the production of or access to electronic communication information from a service provider.”); *id.*, Section (F) (“A service provider may voluntarily disclose electronic communication information . . . [only] if the law otherwise permits that disclosure.”).

4. Meta objects generally to each Interrogatory to the extent that it seeks confidential or proprietary business information, trade secrets, commercially sensitive information, or confidential personal information of Meta or a Non-Party. *See* Rule 1-026(B)(1); *see also* Rule 11-508. Responsive, non-privileged information, if discoverable, will be provided subject to the terms of the agreed Protective Order. Meta will abide by the agreed Protective Order and reserves any and all rights to seek additional protections beyond those provided in the agreed Protective

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Order to the extent appropriate for any particularly sensitive information and/or to object to providing such information altogether if, for example, their relevance is substantially outweighed by the risk of harm posed by provision of the information in light of the protections available.

5. Meta objects to the Interrogatories to the extent they call for information that is outside of its custody, possession, or control, and to the extent they seek information that is already in Plaintiffs' possession, custody, or control; information that is a matter of public record; or information that is available to Plaintiffs from public sources. *Cf.* Rule 1-034(A)(1) NMRA.

6. Meta objects to the Interrogatories to the extent that they seek information relating to users located outside of the United States and/or features not available in the United States. Meta will produce documents and information relating only to users in the United States.

7. Meta's responses are made without waiving or intending to waive (a) the right to object on any ground to the use of these responses, or their subject matter, in any subsequent proceeding or the trial of this or any other action, *see* Rule 1-033(D) NMRA; (b) the right to object to a demand for further responses to this or any other discovery involving or related to the subject matter of the Interrogatories; and (c) the right at any time to revise, correct, add to, or clarify any or all of the objections.

8. Meta objects to Definition A on the applicable time period as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case to the extent it extends to the "present." Unless otherwise specified in response to a particular Interrogatory, Meta construes the relevant time period as the period beginning on January 1, 2009, and ending on April 1, 2024 (except that the time period extends beyond April 1, 2024 for information that concerns initiatives (including promotion thereof), efforts, or research by Meta concerning issues in this

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litigation, or to the extent Meta intends to rely on such information at trial). *See* Rule 1-026(B)(1); *see also* Rule 1-033(C)(1).

9. Meta objects to Definition C (“Algorithm”) as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it purports to require the disclosure of source code and/or information related to source code. *See* Rule 1-026(B)(1), (2); *see also* *Lara v. City of Albuquerque*, 1999-NMCA-012, ¶ 10, 971 P.2d 846 (discovery must be narrowly tailored to avoid irrelevant information); *Ruiz v. S. Pac. Transp. Co.*, 1981-NMCA-094, ¶ 3, 638 P.2d 406 (interrogatories that are “exceedingly broad” are objectionable); *Archuleta v. Santa Fe Police Dep’t ex rel. City of Santa Fe*, 2005-NMSC-006, ¶ 23, 108 P.3d 1019 (“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 not objectionable.”) (internal quotation marks and citation omitted). Any request for source code will require negotiation and the entry of a Protective Order and protocol governing the disclosure of source code. *See* Protective Order, August 23, 2024, ¶ 49. Any response regarding source code will not be provided until such an order is in place. Meta will construe this term for purposes of these responses only to mean Meta’s ranking and recommendation systems, which are groups of machine learning and non-machine learning models and other technologies that work together to filter, rank, and recommend non-advertising content on Meta’s Platforms. *See* Rule 1-033(C)(1).

10. Meta objects to Definition E (“Communication”) as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it imposes obligations beyond those required under the Discovery Rules or purports to require “verbal expressions” and “gestures.” *See* Rule 1-026(B)(2)(c).

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11. Meta objects to Definition H (“Documents”) as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it imposes obligations beyond those required under the Discovery Rules or purports to require the disclosure of source code and/or information related to source code. *See* Rule 1-026(B)(1), (2); *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 not objectionable”) (internal quotation marks and citation omitted).

12. Meta objects to Definition L (“Meta”) as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case to the extent it includes entities and individuals over which Meta exercises no control or includes subsidiaries or affiliate services that are not at issue in this action. *See* Rule 1-026(B)(1), (2); *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 not objectionable.”) (internal quotation marks and citation omitted). Meta construes this term as comprising Facebook and Instagram and—where within scope of the Court’s March 6, 2025 Order Granting in Part the State’s Motion to Compel (“March 6, 2025 discovery order”)—WhatsApp, the only platforms at issue in Plaintiffs’ operative complaint. *See* Rule 1-026(B)(1); Rule 1-033(C)(1); *see* March 6, 2025 Discovery Order at 1-2.

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13. Meta objects to Definition M (“Meta’s Product(s)” or “Your Products”) to the extent they include entities and individuals over which Meta exercises no control, or include subsidiaries, affiliate services, or products that are not at issue in this action. *See* Rule 1-026(B)(1). Meta construes these terms as relating only to Instagram and Facebook and—where within scope of the Court’s March 6, 2025 discovery order—WhatsApp. *Id.*; *see also* Rule 1-033(C)(1); *see* March 6, 2025 Discovery Order at 1-2.

14. Meta objects to Definition S (“Users”) as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it purports to require the disclosure of information relating to users of any Meta social media service other than Facebook and Instagram, and—where within scope of the Court’s March 6, 2025 discovery order—WhatsApp, or to users located outside of the United States and/or features not available in the United States. *See* Rule 1-026(B)(1), (2); *see* March 6, 2025 Discovery Order at 1-2. Meta will provide information relating only to and policies applicable only to users in the United States. Meta further objects to Definition S to the extent it seeks information about users under the age of 13, given that individuals under the age of 13 are not permissible users of Meta’s services. Meta generally uses the term “Youth Users” to refer to users that are at least 13 years of age and under the age of 18.

15. Meta objects to Definition T (“You” or “Your”) as vague, ambiguous, overbroad, unduly burdensome, and not proportional to the needs of the case to the extent it includes entities and individuals over which Meta exercises no control or includes subsidiaries or affiliate services that are not at issue in this action. *See* Rule 1-026(B)(1), (2); *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,

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¶ 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 not objectionable.”) (internal quotation marks and citation omitted). Meta construes this term as comprising Facebook and Instagram and—where within scope of the Court’s March 6, 2025 discovery order—WhatsApp. *Id.*; *see also* Rule 1-033(C)(1); *see* March 6, 2025 Discovery Order at 1-2.

16. By responding to an Interrogatory containing a defined term, Meta is not by implication agreeing with any such definition.

OBJECTIONS AND RESPONSES

Interrogatory 38. With respect to each of the three individuals who were arrested through Operation Metaphile, Fernando Clyde, Marlon Kellywood, and Christopher Reynolds, indicate whether Meta detected these individuals’ high risk or suspicious activity or inappropriate contacts with any other Meta Product User (including the State’s decoy account of Dazee Roanhoarse or any other State decoy account), when it detected each such activity or contact, whether, when, and to whom it reported these individuals or interactions, and whether any of the messages exchanged between these individuals and the State’s decoy accounts or any high risk or suspicious activity or inappropriate contacts by these individuals identified by Meta were subject to end-to-end encryption.

RESPONSE: Meta incorporates its Recurring Specific Objections by reference as though fully set forth herein. Meta further objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the relevant time period. Meta construes the relevant time period as the period beginning on January 1, 2009, and ending on April 1, 2024.

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Meta further objects to this Request as overbroad, unduly burdensome, not proportional to the needs of the case, and vague, in referring to “any other State decoy account” without identifying such accounts. Meta construes “decoy accounts” to be limited to the account the State has identified as “Dazee Roanhoarse.”

Meta further objects to this Interrogatory on the ground that it is compound, effectively constituting multiple embedded interrogatories. See *Knittles Towing, Inc. v. Danlar Collision, Inc.*, No. 14-211 JCH/KK, 2014 WL 11515014, at *2 n.1 (D.N.M. Dec. 9, 2014) (“[T]he Court notes that its compound nature necessarily renders it vague. This single interrogatory seeks explanations for Plaintiff’s denials of twenty-three distinct RFAs. As such, it cannot realistically specify what details it is requesting Plaintiff to include in each of twenty-three distinct explanations.”). In particular, Interrogatory 38 would require Meta to conduct many separate factual investigations, as it asks Meta to provide information separately for three individuals, each of whom had multiple accounts, and asks for at least three categories of information with respect to each individual or account, i.e. (i) whether and when “Meta detected these individuals’ high risk or suspicious activity or inappropriate contacts with any other Meta Product User (including the State’s decoy account of Dazee Roanhoarse or any other State decoy account),” (ii) “whether, when, and to whom it reported these individuals or interactions,” and (iii) “whether any of the messages exchanged between these individuals and the State’s decoy accounts or any high risk or suspicious activity or inappropriate contacts by these individuals identified by Meta were subject to end-to-end encryption.” Meta’s position is that this Interrogatory constitutes at least 9 separate interrogatories. Furthermore, when combined with Meta’s prior compound objections to Interrogatory 37, and considering that Interrogatory 37 constituted 9 separate interrogatories, Plaintiff is over its numerical limit for interrogatories. To the extent Meta nonetheless responds

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to this Interrogatory, it reserves its right to assert its compound objection in response to any motion to compel in respect of this Interrogatory, and in respect of any future interrogatories Plaintiff might seek to serve.

Meta further objects to the use of the undefined terms “high risk,” “suspicious activity,” “inappropriate contacts,” “decoy account,” and “subject to” making this Interrogatory vague, ambiguous, and not reasonably tailored to this litigation. Meta interprets “high risk or suspicious activity or inappropriate contacts” to mean communications that violate Meta’s Community Standards in certain specific “harm areas”: suicide and self-injury (SSI) and eating disorder (ED), bullying and harassment, graphic and violent content, adult nudity, and child safety. Meta further objects to the term “reported” as vague; Meta interprets “reported” to mean reported to law enforcement authorities and/or the National Center for Missing and Exploited Children (NCMEC). Meta further objects on the grounds that it is overly broad, seeks to impose an undue burden on Meta that is not proportional to the needs of the case, is subject to protections and limitations of the Stored Communications Act, and seeks discovery that is not relevant to the claims and defenses in this action, particularly to the extent that it seeks information concerning the content of any messages sent by the identified individuals.

Meta further objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it requires extensive and highly burdensome data analysis and extraction. Meta further objects to this Interrogatory to the extent that it seeks information that Meta does not maintain in the ordinary course of business in the form requested, that does not exist or is not in Meta’s possession, and/or that would be unduly burdensome, and not proportional to the needs of the case to provide. Meta further objects to this Interrogatory to the extent that it seeks detailed technical information or underlying data for which production,

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aggregation, and/or assortment would be highly burdensome and/or disproportional to the needs of the case.

Subject to and without waiving the foregoing objections, Meta provides the below Response, based on its reasonable investigation to date.

1. Fernando Clyde

Meta detected multiple instances of potential inappropriate activity by accounts believed to be operated by user Fernando Clyde. One account was disabled in October 2023. Additionally, Meta detected potential policy violations by two accounts believed to be operated by Clyde. On one account, Meta detected violations of Meta's policies on adult nudity and sexual activity on April 27, 2024, and violations of Meta's policies on bullying and harassment on February 5, 2024. On the second account, Meta detected violations of Meta's policies on adult nudity and sexual activity on October 2, 2023, violations of Meta's policies on bullying and harassment on March 5, 2024, and violations of Meta's policies on bullying and harassment on November 12, 2023. Meta reported activity by an account believed to be operated by Fernando Clyde to the National Center for Missing and Exploited Children ("NCMEC") on May 9, 2024. All active accounts believed to be operated by Fernando Clyde have been disabled. At least some of this user's message threads were encrypted.

2. Marlon Kellywood

Meta detected potential inappropriate activity by accounts believed to be operated by user Marlon Kellywood. Meta reported activity by an account believed to be operated by Marlon Kellywood to NCMEC on May 9, 2024 and disabled all active accounts believed to be operated by Kellywood on May 9, 2024. At least one message thread of this user was encrypted.

3. Christopher Reynolds

Meta detected potential inappropriate activity by accounts believed to be operated by user Christopher Reynolds. Meta disabled one of Christopher Reynolds' accounts on October 5, 2021, after determining that Reynolds was a convicted sex offender. Meta also detected violations of Meta's policies on violent content on one account believed to be operated by Reynolds on December 18, 2023. Meta reported activity by an account believed to be operated by Christopher Reynolds to NCMEC on May 9, 2024, and disabled all active accounts believed to be operated by Reynolds on May 9, 2024. This user does not appear to have any encrypted messaging threads.

Interrogatory 39. For each of Your Products, identify the date when end-to-end encryption of messages or other content was implemented, and the scope of messages or other content subject to such encryption.

AMENDED RESPONSE: Meta incorporates its Recurring Specific Objections by reference as though fully set forth herein. Meta further objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the relevant time period. Meta construes the relevant time period as the period beginning on January 1, 2009, and ending on April 1, 2024.

Meta further objects to this Interrogatory on the ground that it is compound, effectively constituting multiple embedded interrogatories. *See Knittles Towing, Inc. v. Danlar Collision, Inc.*, No. 14-211 JCH/KK, 2014 WL 11515014, at *2 n.1 (D.N.M. Dec. 9, 2014). In particular, Interrogatory 39 would require Meta to conduct multiple separate factual investigations, as it asks Meta (i) with respect to each of Meta's Products, (ii) to "identify the date when end-to-end encryption of messages or other content was implemented," and (iii) to identify "the scope of messages or other content subject to such encryption." Furthermore, when combined with Meta's

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prior compound objections to Interrogatories 37 and 38, and considering that Interrogatories 37 and 38 each constituted 9 separate interrogatories, Plaintiff is over its numerical limit for interrogatories. To the extent Meta nonetheless responds to this Interrogatory, it reserves its right to assert its compound objection in response to any motion to compel in respect of this Interrogatory, and in respect of any future interrogatories Plaintiff might seek to serve.

Meta further objects to the use of the undefined terms “implemented,” “scope,” and “subject to” making this Interrogatory vague, ambiguous, and not reasonably tailored to this litigation. Meta further objects on the grounds that it is overly broad, seeks to impose an undue burden on Meta that is not proportional to the needs of the case, and seeks discovery that is not relevant to the claims and defenses in this action. Meta further objects to the undefined term “other content” as vague, ambiguous, and not reasonably tailored to this litigation. Meta interprets “other content” to exclude message content stored in backups.

Meta further objects to the phrase “when end-to-end encryption [] was implemented” to the extent that asking for a single date on which end-to-end encryption was deployed is vague, ambiguous, and counter-factual. Meta construes “when end-to-end encryption [] was implemented” to mean a general time period during which end-to-end encryption was launched across or within its various products.

Subject to and without waiving the foregoing objections, Meta provides below a Response which generally describes Meta’s end-to-end-encryption.

End-to-end encryption (E2EE) has been available as an optional setting on Facebook Messenger since 2016, and Messenger started the global rollout of default E2EE for personal chats in December 2023. Meta launched optional E2EE for personal chats on Instagram Direct (IGD) globally starting in the first quarter of 2023. When E2EE messaging is used on Facebook

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Messenger or IGD, messages in the end-to-end encrypted thread—including texts, images, and videos—are end-to-end encrypted, meaning Meta can only view the messages if they are shared with Meta for reporting purposes or for other optional features such as translation. Users are able to report to Meta content contained in encrypted threads.

Interrogatory 40: For time periods after You implemented end-to-end encryption on Your Products, identify and describe each method of detection of high risk or suspicious activity or inappropriate contacts that You implemented, including, but not limited to, the date that You implemented such method of detection and the scope of material subject to each such detection method.

RESPONSE: Meta incorporates its Recurring Specific Objections by reference as though fully set forth herein. Meta further objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it seeks information without limitation to the relevant time period. Meta construes the relevant time period as the period beginning on January 1, 2009, and ending on April 1, 2024.

Meta further objects to this Interrogatory on the ground that it is compound, effectively constituting multiple embedded interrogatories. *See Knittles Towing, Inc. v. Danlar Collision, Inc.*, No. 14-211 JCH/KK, 2014 WL 11515014, at *2 n.1 (D.N.M. Dec. 9, 2014). In particular, Interrogatory 40 seeks information about multiple detection methods, and would require Meta to conduct many separate factual investigations, as it asks Meta to provide information with respect to each of Meta’s Products, i.e. “identify and describe”: (i) “each method of detection of high risk or suspicious activity or inappropriate contacts that You implemented,” (ii) “the date that You implemented such method of detection,” and (iii) “the scope of material subject to each such detection method.” Furthermore, when combined with Meta’s prior compound objections to

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Interrogatories 37-39, and considering that Interrogatories 37 and 38 each constituted 9 embedded interrogatories, Plaintiff is over its numerical limit for interrogatories. To the extent Meta nonetheless responds to this Interrogatory, it reserves its right to assert its compound objection in response to any motion to compel in respect of this Interrogatory, and in respect of any future interrogatories Plaintiff might seek to serve.

Meta further objects to the use of the undefined terms “method of detection” and “detection method” making this Interrogatory vague, ambiguous, and not reasonably tailored to this litigation. Given this vagueness, Meta construes “method of detection” and “detection method” to be limited to classifiers that review and detect content for potential violations of Facebook’s Community Standards and Instagram’s Community Guidelines (collectively, “Policies”), to the extent that they pertain to the following policy-violating content, also known as “harm areas”: suicide and self-injury (SSI) and eating disorder (ED), bullying and harassment, graphic and violent content, adult nudity, and child safety. Each of these classifiers is described in further detail in the Response below. Beyond these classifiers, there could be other tools that might be construed as “methods of detection” or “detection methods” related to “high risk” or “suspicious activity,” depending on the meaning given to those terms; Meta identifies certain such “other tools” not necessarily exhaustively, but by way of example, generally and by category.

Meta further objects to the use of the undefined terms “high risk,” “suspicious activity,” and “inappropriate contacts,” making this Interrogatory vague, ambiguous, and not reasonably tailored to this litigation. Meta interprets “high risk or suspicious activity or inappropriate contacts” to mean communications that violate Meta’s Community Standards in certain specific “harm areas”: suicide and self-injury (SSI) and eating disorder (ED), bullying and harassment, graphic and violent content, adult nudity, and child safety.

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Meta further objects to the use of the undefined term “implemented” to the extent that it asks for a single date on which a “method of detection” was deployed, because each method was developed through an iterative process and through a cross-functional effort across multiple Meta teams, such that any could have multiple historic iterations. Meta construes “the date that You implemented” to mean the date on which the latest iteration was launched.

Meta further objects to this interrogatory on the grounds that it is overly broad; seeks to impose an undue burden on Meta that is not proportional to the needs of the case; seeks discovery that is not relevant to the claims and defenses in this action, particularly to the extent it does not relate to harms alleged in Plaintiff’s Complaint; and is without limitation to the Relevant Time Period.

Subject to and without waiving the foregoing objections, Meta provides below a Response which generally describes Meta’s classifier systems and other tools and notes that variations may exist across Meta’s platforms. The description contained in this Response is therefore not exhaustive or inclusive of every detail comprising every process that may support the detection technology on Meta’s platforms.

1. Classifiers

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- **SSI Classifiers.** “SSI classifiers” have been deployed on Meta’s platforms at least as early as February 2019. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- **ED Classifiers.** “ED classifiers” have been deployed on Meta’s platforms at least as early as March 2021. [REDACTED]

[REDACTED]

[REDACTED]

- **Bullying and Harassment Classifiers.** “Bullying and harassment classifiers” have been deployed on Meta’s platforms at least as early as May 2018. [REDACTED]

[REDACTED]

[REDACTED]

- **Graphic and Violent Content Classifiers.** “Graphic and violent content classifiers” have been deployed on Meta’s platforms at least as early as December 2016. [REDACTED]

[REDACTED]

[REDACTED]

- **Adult Nudity Classifiers.** Adult nudity classifiers have been deployed on Meta’s platforms at least as early as January 2016. [REDACTED]

[REDACTED]

[REDACTED]

- **Child Safety Classifiers.** Child safety classifiers have been deployed on Meta’s platforms at least as early as 2018. [REDACTED]

[REDACTED]

[REDACTED]

- **Borderline Classifiers Generally.** A “borderline classifier” is [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2. Examples of Other Tools

- **Media/Image-Based Interventions.** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] In addition

to using these technologies to identify known CSAM, Meta uses, among other things, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- **Child Safety - Actor Behavioral Framework.** The Child Safety - Actor Behavioral Framework proactively identifies potential bad actors [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- **Child Safety Strategic Network Disruptions.** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- **Preventing Adults from Discovering Teens.** Meta makes it difficult for adults who have engaged in “potentially suspicious behavior” to find accounts belonging to Youth Users. Potentially suspicious behavior includes being reported or blocked by an account belonging to a Youth User. Instagram developed technology that would prevent adults with potentially suspicious behavior from discovering accounts belonging to Youth Users in Reels, Explore, or “Accounts Suggested For You.” These adults are unable to follow accounts belonging to Youth Users by searching their usernames. Additionally, adults who have engaged in “potentially

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suspicious behavior” are unable to see comments from Youth Users on other people’s posts or leave comments on Youth User’s posts.

- **User Reporting Tools.** Instagram and Facebook users can report a user account or content for violations of Meta’s policies.

- **Teen DM Safety Notice.** In March 2021, Instagram launched a Safety Notice tool to encourage teens to be cautious in conversations with adults they are already connected to. These safety notices in direct messages notify Youth Users when an adult who has been exhibiting potentially suspicious behavior is interacting with them in direct messages. For example, if an adult is sending a large amount of friend or message requests to people under 18, Instagram alerts the recipients within their direct messages and gives them an option to end the conversation or block, report, or restrict the adult. At the time of launch, teens could not opt out of the Teen DM Safety Notice.

- **On-Device Nudity Protections.** In April 2024, Meta began testing a new nudity protection tool in Instagram Direct Messages, which automatically blurs nude images and encourages users to reconsider sending nude images. This tool, which has since been fully rolled out, is turned on by default for teens under 18. When nudity protection is turned on, including as the default for Teen accounts, people sending images containing nudity will see a notice reminding them to be cautious with sending sensitive photos, and that they can unsend these photos if they have changed their mind. When someone receives an image detected as containing nudity, it will be automatically blurred under a warning screen, meaning that the recipient is not confronted with a nude image and can choose whether or not to view it. Meta also will show the recipient a message encouraging them not to feel pressure to respond, with an option to block the sender and report the chat.

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Dated: September 4, 2025

Submitted by,

HOLLAND & HART LLP

/s/ John C. Anderson

John C. Anderson
Olga M. Serafimova
110 N. Guadalupe Street, Suite 1
Santa Fe, NM 87501
Phone: (505) 988-4421
jcanderson@hollandhart.com
omserafimova@hollandhart.com

-and-

COVINGTON & BURLING LLP

Nathan E. Shafroth (*Pro Hac Vice*)
Salesforce Tower
415 Mission Street, Suite 5400
San Francisco, CA 94105-2533
nshafroth@cov.com

Timothy C. Hester (*Pro Hac Vice*)
One City Center
850 Tenth Street, NW
Washington, DC 20002-4956
thester@cov.com

Patrick W. Nutter (*Pro Hac Vice*)
1999 Avenue of the Stars, Suite 3500
Los Angeles, CA 90067
pnutter@cov.com

*Counsel for Defendants Meta Platforms Inc.,
Instagram, LLC, Meta Payments, Inc., and
Meta Platforms Technologies, LLC*

CERTIFICATE OF SERVICE

I, John C. Anderson, hereby certify that on September 4, 2025, I caused a copy of the foregoing to be served via email and/or hand delivery on the following:

James W. Grayson
Chief Deputy Attorney General
New Mexico Attorney General's Office
P.O. Drawer 1508
Santa Fe, NM 87504-1508
Phone: (505) 218-0850
Email: jgrayson@nmag.gov

Serena R. Wheaton
Assistant Attorney General
New Mexico Attorney General's Office
Consumer & Environmental Protection Division
201 Third St. N.W., Suite 300
Albuquerque, NM 87102
Phone: (505) 490-4846
Email: swheaton@nmag.gov

Linda Singer
David I. Ackerman
MOTLEY RICE LLC
401 9th St., NW, Suite 630
Washington, D.C. 20004
Phone: (202)-232-5504
Email: lsinger@motleyrice.com
Email: dackerman@motleyrice.com

Attorneys for Plaintiff, the State of New Mexico ex rel Raúl Torrez, Attorney General

/s/ John C. Anderson