

FILED UNDER SEAL

EXHIBIT 34

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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' SEVENTH SUPPLEMENTAL OBJECTIONS AND RESPONSES TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANTS
(Interrogatories 1, 4, 5, 12)**

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 Supplemental Objections and Responses to Plaintiff's First 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

- The fields “responsible_rid,” “deprecated_responsible_id,” and or/ “primary_profile_rid” in the “entities_attr” column, which may reflect the hashed ID for the account that is the owner or creator of the entity the report is about.
- The “interactor_rid” field of the “interactor_attr” column, which may reflect the hashed ID for the account that made the report.

In addition to the fields described in prior responses, the Second User Report Spreadsheet contains, to the extent available:

- The “object_rid” column, which may reflect the hashed ID for the account to which the report is about.
- The “responsible_rid” column, which may reflect the hashed ID for the account that created the entity that was reported.
- The fields “deprecated_reporter_id” and “reporter_rid,” which may reflect the hashed ID of the accounts that made the report.

In addition to the fields described in prior responses, the Violating Entities Spreadsheet contains, to the extent available:

- The hashed ID for the account to which the report is about or the creator of the reported content may be reflected in the “entity_rid,” “creator_rid,” and/or “owner_rid” columns.

Interrogatory 4. Identify all advertisers located in New Mexico with whom you have contracted or otherwise arranged to display advertisements, and, for each advertiser, identify: (a) the time frame(s) in which the advertisement was displayed; (b) the revenue you received for each advertisement displayed; (c) the total views or impressions for each advertisement; and (d) the audience to which the advertisement was targeted.

RESPONSE (October 14, 2024): Meta incorporates its Recurring Specific Objections by reference as though fully set forth herein. Meta objects to this Interrogatory as vague and ambiguous, including with respect to the phrases “advertisers located in New Mexico,” “contracted or otherwise arranged to display advertisements,” “the time frame(s) in which the advertisement was displayed,” “the revenue you received for each advertisement displayed,” “the total views or impressions for each advertisement,” and “the audience to which the advertisement was targeted.” See Rule 1-026(B)(1) (requirement to provide “responsive information” implies a clearly stated request). Meta further objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of the case, including because it purports to seek detailed information about every ad placed by every advertiser in New Mexico over a ten year period, without regard to the content of the advertisement or whether the advertisement was targeted at or delivered to users in New Mexico or users between the ages of 13 to 17, and to the extent it is not limited to advertisements on Facebook and Instagram, the only platforms at issue in Plaintiff’s operative complaint. 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 further objects that the identification of specific advertisers in New Mexico and details about every ad they placed is not relevant to any claims or defenses in this case and may contain private information of third parties. *Id.* Meta further objects to this Interrogatory as unduly burdensome because it requires Meta to compile, examine, audit, abstract, and summarize business records related to millions of advertisements. See Rule 1-026(B)(2). Meta further objects to this

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Interrogatory to the extent the information is not reasonably ascertainable, as much of Meta's advertising does not target particular geographies, and because revenue is often not traceable to particular advertising efforts. *See* Rule 1-026(B)(1) (requirement to provide information "then known to the party" implies information should be reasonably ascertainable).

Meta does not read this Interrogatory as seeking information protected by the attorney-client privilege, the work-product doctrine, and/or any other applicable privilege, immunity, or protection, and therefore will not include such information on any privilege log.

Subject to and without waiving the foregoing objections, Meta provides the following response to Interrogatory No. 4: Pursuant to Rule 1-033(E), Meta will produce information from which answers broadly responsive to this Interrogatory may be derived. Specifically, Meta has produced data sufficient to show the third-party advertisers that placed ads on Facebook and/or Instagram between January 1, 2012 and March 31, 2024 and whose self-reported address indicated they are located in the state of New Mexico ("New Mexico advertisers"). Further, for every New Mexico advertiser, Meta has produced data reflecting (a) the unique combinations of expressed age and gender targeting preferences made by the advertiser, (b) the name of the advertiser, and (c) aggregate annual information regarding (i) the time frames in which advertisements with the specific combination of targeting preferences were displayed; (ii) the total ad revenue Meta received for advertisements associated with the specific combination of targeting preferences; and (iii) the total number of impressions associated with the specific combination of targeting preferences.

SUPPLEMENTAL RESPONSE (January 27, 2025): Subject to and without waiving the foregoing objections, 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. Meta incorporates and refers

to the spreadsheets produced at bates METANMAG-009-00000001 and METANMAG-009-00000002. Specifically, Meta has produced data sufficient to show each advertisement placed on Facebook and/or Instagram between January 1, 2012 and March 31, 2024 by a third-party advertiser whose self-reported address indicated that it is located in New Mexico. For every such advertisement, Meta has produced data reflecting (a) the year in which the advertisement was displayed, (b) the name of the advertiser, (c) the backend age and gender targeting data values maintained by Meta, (d) the time frame in which the advertisement was displayed, and (e) aggregate annual information regarding (i) the total ad revenue Meta received for the advertisement; and (ii) the total number of impressions associated with the advertisement.

SUPPLEMENTAL RESPONSE (July 1, 2025): Subject to and without waiving the foregoing objections, 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. Meta incorporates and refers to the spreadsheets produced at bates METANMAG-009-00000001, METANMAG-009-00000002, and METANMAG-071-00000001. Specifically, Meta has produced data sufficient to show each advertisement placed on Facebook and/or Instagram between January 1, 2011 to December 22, 2011, as well as January 1, 2012 to March 31, 2024, by a third-party advertiser whose self-reported address indicated that it is located in New Mexico.² For every such advertisement, Meta has produced data reflecting (a) the year in which the advertisement was displayed, (b) the name of the advertiser, (c) the app on which the advertisement was displayed (i.e., Facebook or Instagram), (d) the time frame during which the advertisement was displayed, (e) the user age(s) to which the advertisement was targeted, (f) the user gender(s) to which the advertisement was targeted, and (g) aggregate annual information regarding (i) the total ad revenue

² Instagram data is not available for 2011.

Meta was due to be paid for the advertisement from users believed to be located in the United States; and (ii) the total number of impressions on the advertisement by users believed to be located in the United States.

Interrogatory 5. Identify all advertisers located outside of New Mexico with whom you have contracted or otherwise arranged to display advertisements to users in New Mexico, and, for each advertiser, identify: (a) the time frame(s) in which the advertisement was displayed; (b) the revenue you received for each advertisement displayed; (c) the total views or impressions for each advertisement; and (d) the audience to which the advertisement was targeted.

RESPONSE (October 14, 2024): Meta incorporates its Recurring Specific Objections by reference as though fully set forth herein. Meta objects to this Interrogatory as vague and ambiguous, including with respect to the phrases “advertisers located outside New Mexico,” “contracted or otherwise arranged to display advertisements,” “the time frame(s) in which the advertisement was displayed,” “the revenue you received for each advertisement displayed,” “the total views or impressions for each advertisement,” and “the audience to which the advertisement was targeted.” See Rule 1-026(B)(1) (requirement to provide “responsive information” implies a clearly stated request). Meta further objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of the case, including because it purports to seek detailed information about every ad placed by every advertiser located outside of New Mexico over a ten year period, without regard to the content of the advertisement or whether the advertisement was targeted at or delivered to users in New Mexico or users between the ages of 13 to 17, and to the extent it is not limited to advertisements on Facebook and Instagram, the only platforms at issue in Plaintiff’s operative complaint. Meta further objects that the identification of specific advertisers located outside of New Mexico and details about every ad they placed is not