

FILED UNDER SEAL

EXHIBIT 55

**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' SIXTH SUPPLEMENTAL OBJECTIONS AND RESPONSES TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANTS
(Interrogatory 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

S to the extent it seeks information about individuals under age 13, given they are not permissible users of Meta's services.

14. Meta objects generally 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, ¶ 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 including Facebook and Instagram, the only platforms at issue in Plaintiffs' operative complaint. *Id.*; *see also* Rule 1-033(C)(1).

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

OBJECTIONS AND RESPONSES

Interrogatory 12. For each youth feature referenced in response to Interrogatory No. 11, Identify that tool or feature's adoption rate among age 13-17 Users in New Mexico and the total number of age 13-17 Users who have used that feature in New Mexico.

RESPONSE: Meta incorporates its Recurring Specific Objections by reference as though fully set forth herein.

Meta objects to Interrogatory 12 to the extent that it seeks information protected by the attorney-client privilege, the work-product doctrine, and/or any other applicable privilege, right,

another in the ordinary course of business. [REDACTED]% of age 13-17 Users predicted to reside in the U.S. had Hidden Words or Advanced Comment Filter enabled for comments on Instagram between February 24, 2025 and March 23, 2025.

- **Hidden Words (DMs):** [REDACTED]% of age 13-17 Users predicted to reside in the U.S. had Hidden Words enabled for message requests on Instagram between February 24, 2025 and March 23, 2025.

Certain tools or features available to all users help age 13-17 Users manage the amount of time they are spending on Instagram. Meta provides adoption rate for the following time spent tools or features:

- **Daily Limit:** [REDACTED]% of age 13-17 Users predicted to reside in the U.S. had Daily Limit enabled on Instagram between January 8, 2023 and March 23, 2025.
- **Your Activity:** [REDACTED]% of age 13-17 Users predicted to reside in the U.S. viewed the Your Activity user experience center on Instagram between September 7, 2024 and March 24, 2025.

Meta provides adoption rate for the following additional tools or features:

- **Single-Tap Teen Safety & Privacy Settings Prompts:** [REDACTED]% of age 13-17 Users predicted to reside in the U.S. who were shown a Single-Tap Teen Safety & Privacy Setting Prompt clicked the prompt to enable recommended safety and privacy settings on Instagram between December 26, 2024 and March 23, 2025.
- **Family Center Supervision:** [REDACTED]% of age 13-17 Users predicted to reside in the U.S. users were enrolled in Supervision through Family Center on Instagram between March 23, 2025 and March 24, 2025.