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Operations, LLC; Facebook Payments, Inc.;
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Siculus, Inc.; and Mark Elliot Zuckerberg
Additional counsel listed on
signature pages

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

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

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL NO. 3047

Civil Case No. 4:22-md-03047-YGR:

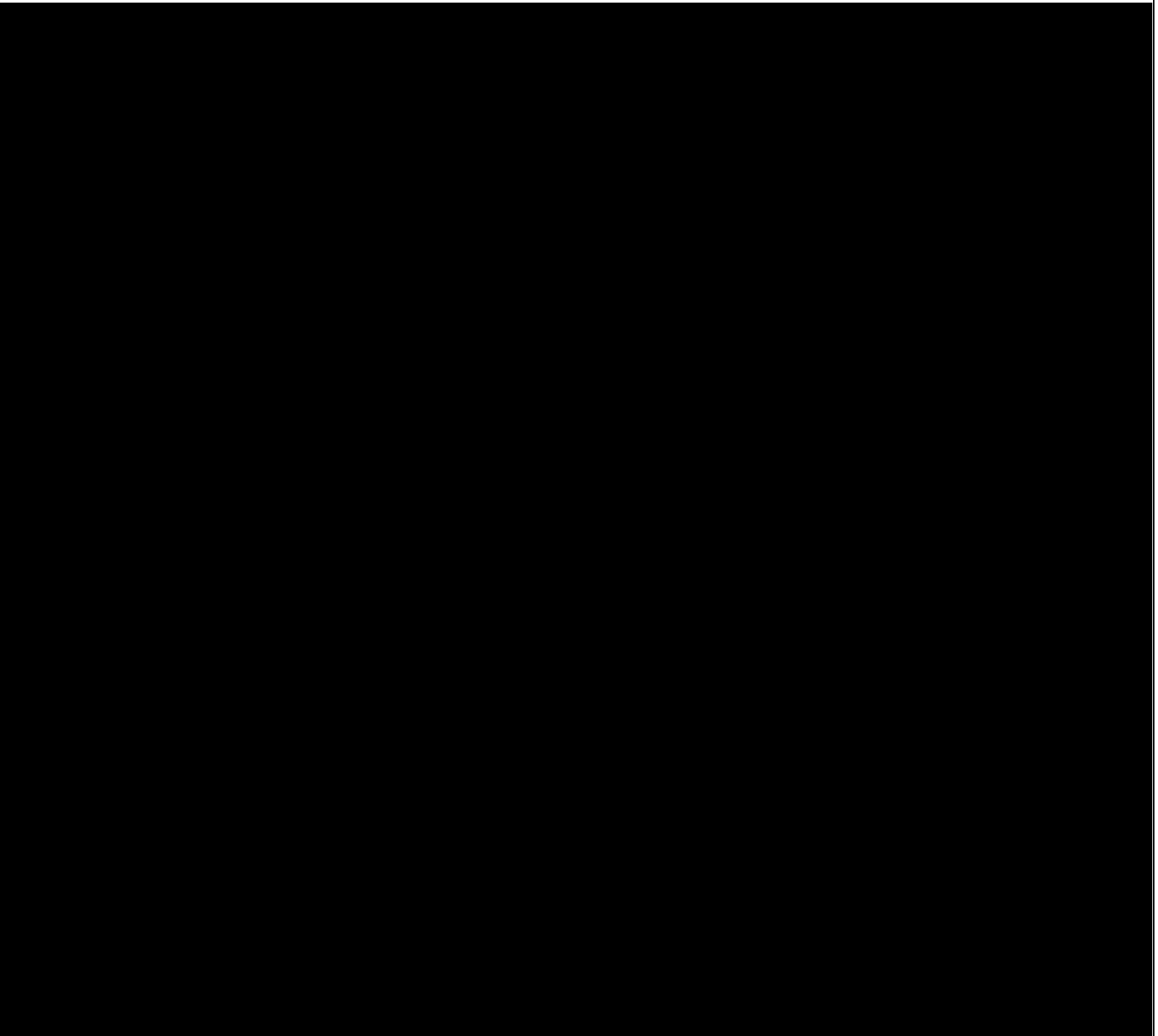
Honorable Yvonne Gonzalez Rogers

**META DEFENDANTS' RESPONSES AND
OBJECTIONS TO PLAINTIFFS' THIRD
SET OF INTERROGATORIES**

HIGHLY CONFIDENTIAL (COMPETITOR)

Defendants Meta Platforms, Inc., Facebook Payments, Inc., Siculus, Inc., Facebook Operations, LLC, and Instagram, LLC, (collectively, “Defendants” or “Meta”), by and through their attorneys, Covington & Burling, LLP, submit their responses and objections to Plaintiffs’ Third Set of Interrogatories (“Interrogatories”) served on October 9, 2024.

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 should future investigation indicate that such supplementation or amendment is necessary.



INTERROGATORY 15:

Identify each Counter-metric You evaluated when considering whether or not to implement any protection, tool, intervention, or feature directed at the Safety of Youth.

RESPONSE:

Meta incorporates its Statements and Objections Applicable to All Interrogatories and Objections to Specific Definitions and Instructions by reference as though fully set forth herein. Meta objects to this Interrogatory, in its entirety, on the ground that Plaintiffs have already exceeded the total number of 45 interrogatories they are permitted to serve on Meta. As detailed above, Plaintiffs' Interrogatories Nos. 1-4 constituted a total of 60 interrogatories, when taking into account the numerous distinct interrogatories included in each one.

HIGHLY CONFIDENTIAL (COMPETITOR)

1 Meta further objects to the use of the undefined phrase “each Counter-metric...evaluated,” making
2 this Interrogatory vague and ambiguous. Should the phrase mean any or all metrics used by Meta engineers
3 in the development of product changes, Meta objects that the request is overbroad and burdensome as not
4 proportional to the needs of the case, including by purporting to request Meta to “identify each Counter-
5 metric” evaluated for “any protection, tool, intervention, or feature directed at the Safety of Youth.”
6

7 Meta further objects to this Interrogatory as vague and ambiguous in its use of the undefined terms
8 “protection,” “tool,” “intervention,” and “feature.”

9 Meta further objects to this Interrogatory on the ground that it is overbroad, unduly burdensome,
10 and not proportional to the needs of the case as it is compound to the extent that it encompasses multiple
11 separate questions. Having answered the compound Interrogatories Nos. 1-4, composed of numerous
12 interrogatories, Meta does not waive its objection to this Interrogatory as compound for purposes of
13 counting the total number of Interrogatories served by Plaintiffs.
14

15 Meta further objects to the extent this request seeks documents outside of Meta’s possession,
16 custody, or control, or seeks documents protected from disclosure by the attorney-client privilege, work-
17 product doctrine, or other applicable privilege.

18 Subject to and without waiving the foregoing general and specific objections, Meta responds to
19 this Interrogatory as follows:
20

21 Meta is continuously updating its apps and features to improve user experiences and enhance user
22 safety. Each update is tested before it is implemented across Meta’s surface. Testing can involve
23 measuring various metrics for a new product update. These metrics are often referred to as counter-
24 metrics, or guardrail metrics.

25 Meta currently employs a combination of tools that allow developers to access statistically
26 significant regressions on three types of metrics, including:
27
28

HIGHLY CONFIDENTIAL (COMPETITOR)

- Company Critical Metrics (CCMs) are made available in every experiment. CCMs include user metrics, system performance metrics, and safety metrics. Because CCMs are created in every experiment, the list of CCMs is updated every 6 months.
- Domain Vital Metrics are metrics relevant to a specific domain. The list of Domain Vital Metrics is unique to the domain, and updated by the team in charge of the domain that houses the update being tested. Domain Vital Metrics are made available in experiments on updates developed in the relevant domain.
- Ad-hoc Metrics can be added by developers for a specific product update. These metrics typically test specific features of the update to confirm whether the change creates intended outcomes. For example, when Instagram was considering automatically approving “follow-back” requests, one ad-hoc counter-metric analyzed was how many users removed the follower that was automatically approved.

The following are examples of current metrics used to evaluate app updates, including updates directed at teen safety:

- Monthly Active Users (MAU)
- Daily Active Users (DAU)
- Time Spent
- Sessions
- Impressions and Viewport View (VPV)

Meta’s investigation is ongoing and Meta will provide information responsive to this Interrogatory as necessary in accordance with the federal rules and/or any applicable order of the Court. Meta expressly reserves all rights to supplement this response.

HIGHLY CONFIDENTIAL (COMPETITOR)

1 Dated: December 9, 2024

Respectfully submitted,

3 **COVINGTON & BURLING LLP**

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Inc.; Facebook Technologies, LLC; Instagram,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail on December 9, 2024 on the following:

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Defendants-MDL3047JCCP5255@skaddenlists.com

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 9, 2024.

DATED: December 9, 2024

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen

VERIFICATION

I, Jerrod Lowmaster, am a Data Science Director at Meta. I am authorized to make this Verification for and on behalf of Meta. I have read META'S OBJECTIONS & RESPONSES TO PLAINTIFFS' THIRD SET OF INTERROGATORIES NO. 15, and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 9th day of December, 2024, in Redmond, Washington.

Signed by:

/s/ 0E87256604E64B8...
Jerrod Lowmaster

META DEFENDANTS' RESPONSES AND OBJECTIONS TO PLAINTIFFS' THIRD SET OF INTERROGATORIES — CASE NO.
4:22-MD-03047- YGR

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

METATNAG-044-00000725

HIGHLY CONFIDENTIAL (COMPETITOR)
HIGHLY CONFIDENTIAL (ATTORNEY'S EYES ONLY)

META3047MDL-118-00000731
METANMAG-023-00055769
PLTF EX-03485_0017

VERIFICATION

I, Steve DeLucia, am a Data Science Director at Meta. I am authorized to make this Verification for and on behalf of Meta. I have read META'S OBJECTIONS & RESPONSES TO PLAINTIFFS' THIRD SET OF INTERROGATORIES NO. 15, and know the contents thereof. I affirm that I have personal knowledge that the facts set forth therein are true and correct, or as to matters that are not within my personal knowledge, that I have made a reasonable inquiry and I am informed and believe that those facts are true and correct.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 9th day of December, 2024, in Ukiah, California.

Signed by:
/s/ Steve DeLucia
1C932A490E764EB...
Steve DeLucia