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Operations, LLC; Facebook Payments, Inc.;
Facebook Technologies, LLC; Instagram, LLC;
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:

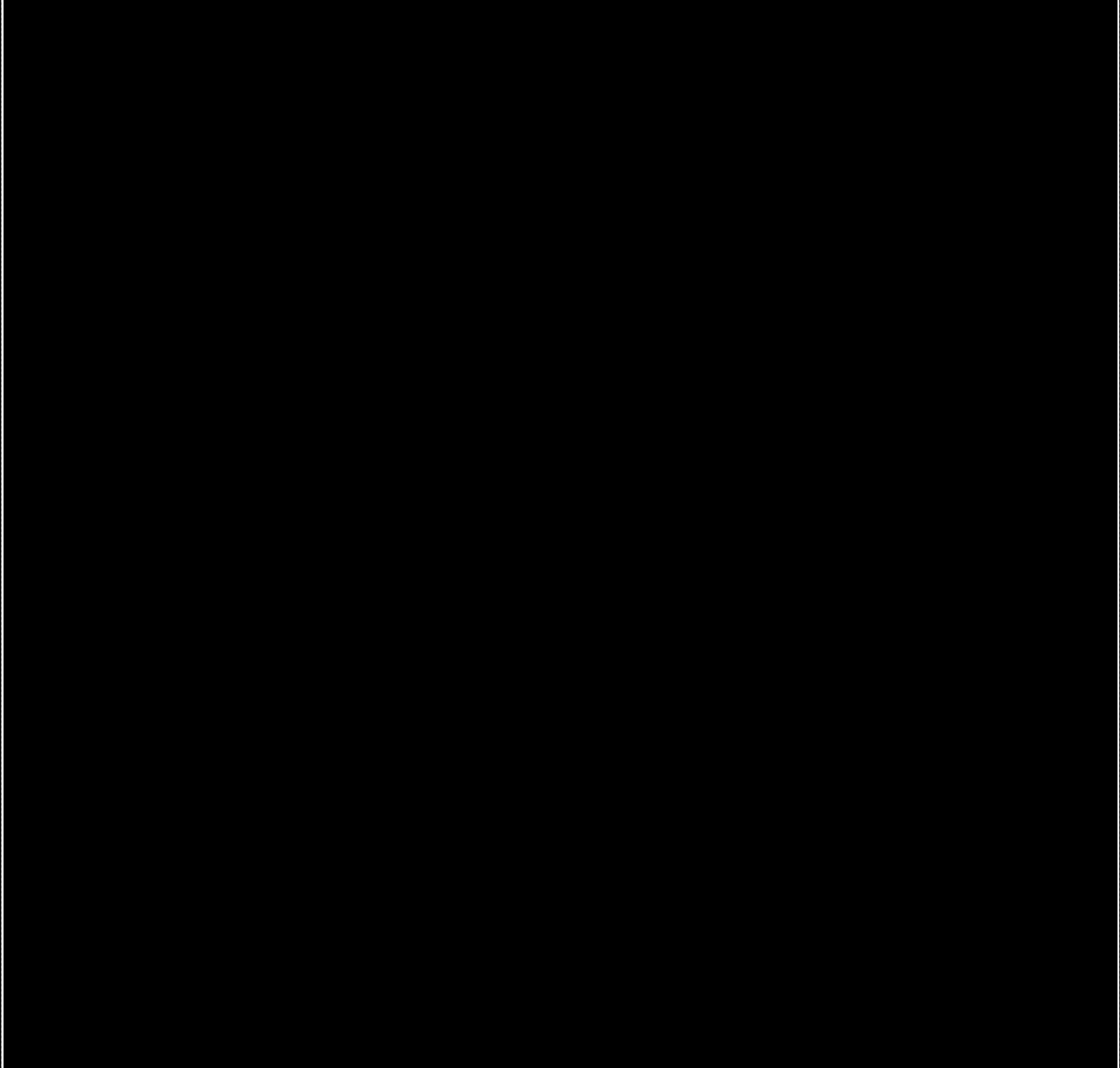
Honorable Yvonne Gonzalez Rogers

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

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 supplemental responses and objections to Plaintiffs' Sixth Set of Interrogatories ("Interrogatories") served on February 21, 2025.

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.

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INTERROGATORY 28:

Provide the engagement metrics that Meta tracks—including number of views, impressions, clicks, likes, reactions, comments, or other interactions—for the following documents or posts cited in State AGs’ Complaint for Injunctive or Other Relief, 4:23-cv-05448 (N.D. Cal. Oct. 24, 2023) (hereinafter “Complaint”):

HIGHLY CONFIDENTIAL (COMPETITOR)

1. Investor Relations, Q4 2019 Earnings Call Transcript, Meta (Jan. 29, 2020), <https://investor.atmeta.com/investorevents/default.aspx>, referenced in ¶ 122 of the Complaint;
2. Investor Relations, Q3 2020 Earnings Call Transcript, Meta (Oct. 29, 2020), <https://investor.atmeta.com/investorevents/default.aspx>, referenced in ¶ 123 of the Complaint;
3. Adam Mosseri, Shedding More Light on How Instagram Works, Instagram (June 8, 2021), <https://about.instagram.com/blog/announcements/shedding-morelight-on-how-instagram-works>, referenced in ¶¶ 167, 187 of the Complaint;
4. Help Center, Data Policy, Instagram, <https://help.instagram.com/155833707900388>, referenced in ¶ 169 of the Complaint;
5. Privacy Center, Privacy Policy, Meta (2023), referenced in ¶¶ 173–74 of the Complaint;
6. Help Center, Recommendations on Instagram, Instagram (2023), <https://privacycenter.instagram.com/policy/>, referenced in ¶ 188 of the Complaint;
7. Post by Mark Zuckerberg, Facebook (Oct. 5, 2021, 5:14 p.m.), <https://www.facebook.com/zuck/posts/10113961365418581>, referenced in ¶ 223 of the Complaint;
8. Ameet Ranadive & David Ginsburg, New Time Management Tools on Instagram and Facebook, About Instagram Blog (Aug. 1, 2018), <https://about.instagram.com/blog/announcements/new-timemanagement-tools-on-instagram-and-facebook>, referenced in ¶ 331 of the Complaint;
9. A Parent and Guardian’s Guide to Instagram, Instagram, <https://about.instagram.com/community/parents>, (last visited Oct. 22, 2023), referenced in ¶ 336 of the Complaint;
10. Measuring Prevalence of Violating Content on Facebook, <https://about.fb.com/news/2019/05/measuring-prevalence/>, Meta (May 23, 2019), referenced in ¶ 464 of the Complaint;

HIGHLY CONFIDENTIAL (COMPETITOR)

11. Community Standards Enforcement Report, November 2019 Edition, Meta (Nov. 13, 2019), <https://about.fb.com/news/2019/11/community-standardsenforcement-report-nov-2019/>, referenced in ¶ 473 of the Complaint;
12. Community Standards Enforcement Report, Second Quarter 2023, Meta, referenced in ¶ 473 of the Complaint;
13. Community Standards Enforcement Report, Third Quarter 2021, Meta (Nov. 9, 2021), <https://about.fb.com/news/2021/11/community-standardsenforcement-report-q3-2021/>, referenced in ¶¶ 481, 490 of the Complaint;
14. Community Standards Enforcement Report, Fourth Quarter 2020, Meta (Feb. 11, 2021), <https://about.fb.com/news/2021/02/community-standardsenforcement-report-q4-2020/>, referenced in ¶ 499 of the Complaint; and
15. Pratiti Raychoudhury, What Our Research Really Says About Teen Well-Being and Instagram, Meta (Sept. 26, 2021), <https://about.fb.com/news/2021/09/research-teen-well-being-andinstagram/>, referenced in ¶ 598 of the Complaint.

SUPPLEMENTAL RESPONSE:

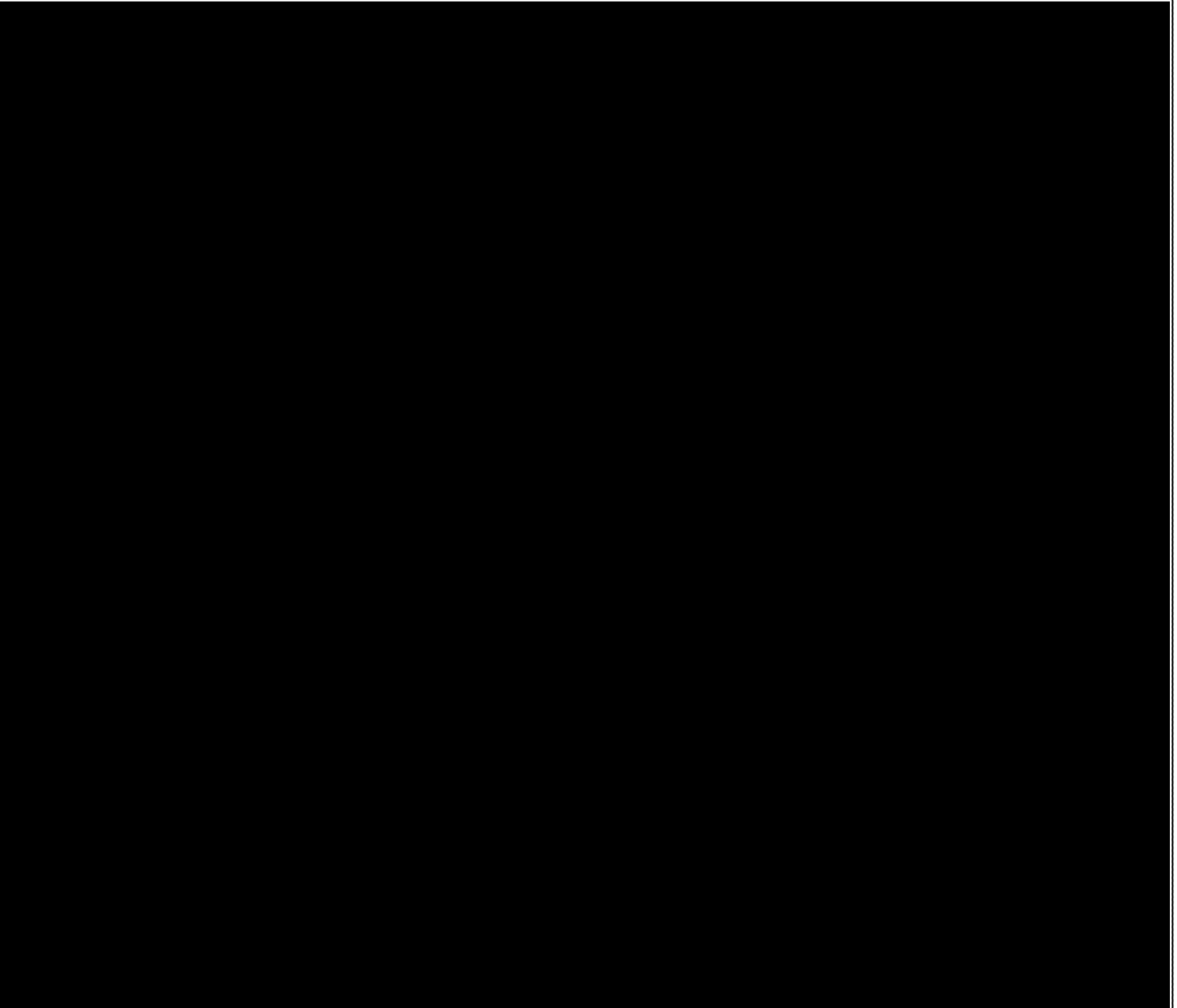
Meta incorporates by reference its April 1, 2025 Responses and Objections to Plaintiffs' Sixth Set of Interrogatories and, in particular, its Statements and Objections to All Interrogatories, Objections to Defined Terms and Instructions, and specific objections to Interrogatory No. 28 as if fully set forth herein. In addition, Meta understands that Plaintiffs have narrowed this Interrogatory to seek only impressions with respect to sub-part (g).

Subject to and without waiving the foregoing objections, Meta provides the following supplemental response to Interrogatory No. 28: The total number of impressions for Mark Zuckerberg's October 5, 2021 Facebook post through March 31, 2024 is 177,613,951. The total impressions include

HIGHLY CONFIDENTIAL (COMPETITOR)

1 impressions for global users and do not deduplicate for repeated impressions by the same user, and also
2 exclude self views.

3 Meta reserves the right to supplement or modify its response based upon documents or information
4 identified over the course of discovery.



HIGHLY CONFIDENTIAL (COMPETITOR)

1 Dated: May 16, 2025

Respectfully submitted,

2 **COVINGTON & BURLING LLP**

3
4 /s/ Ashley M. Simonsen

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24 *Facebook Technologies, LLC; Instagram, LLC;*
25 *Siculus, Inc.; and Mark Elliot Zuckerberg*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail on May 16, 2025 on the following:

PSCServiceMDL3047@motleyrice.com
~SnapMDL3047JCCP5255@mto.com
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TikTokMDL3047JCCP5255@kslaw.com
SM.MDLAGLeads@coag.gov
mdl3047coleadfirms@listserv.motleyrice.com
Defendants-MDL3047JCCP5255@skaddenlists.com

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 16, 2025.

DATED: May 16, 2025

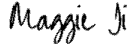
By: /s/ Ashley M. Simonsen

Ashley M. Simonsen

VERIFICATION

I, Maggie Ji, am a Data Scientist at Meta. I am authorized to make this Verification for and on behalf of Meta. I have read META'S SUPPLEMENTAL RESPONSES & OBJECTIONS TO PLAINTIFFS' SIXTH SET OF INTERROGATORIES NO. 28 and 32, 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 16th day of May, 2025, in San Mateo, CA.

Signed by:

/s/ 24C1C1F4F7DF406...
Maggie Ji