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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.

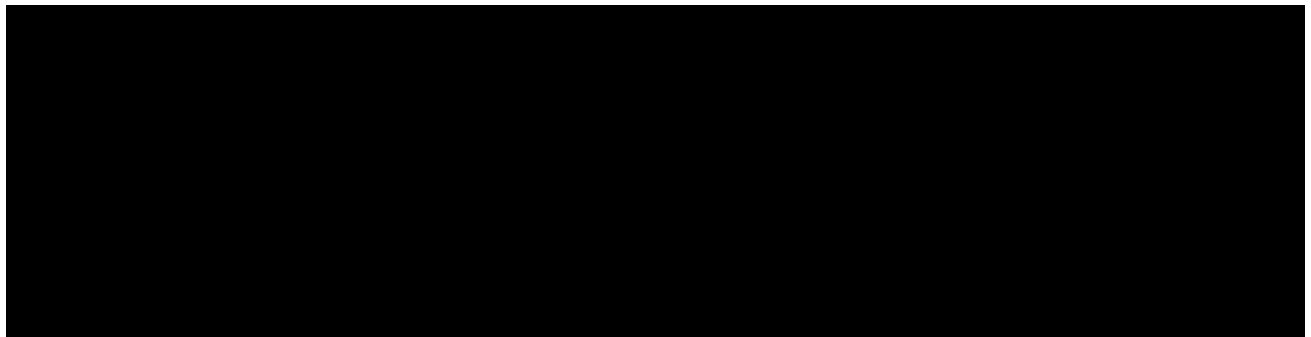
NO. D-101-CV-2023-02838

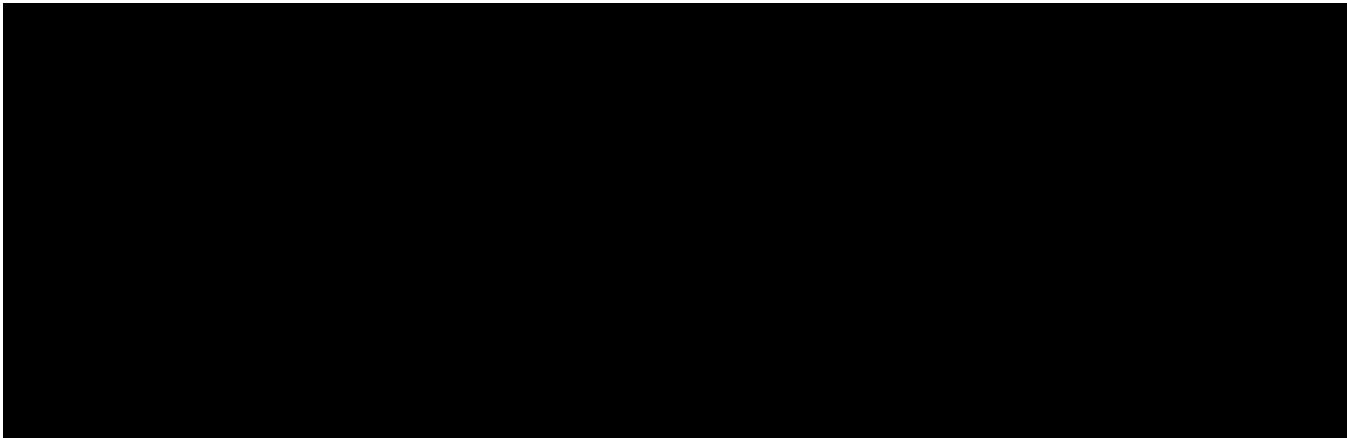
META PLATFORMS, INC.;
INSTAGRAM, LLC;
META PAYMENTS, INC.; and
META PLATFORMS TECHNOLOGIES, LLC,

Defendants.

**DEFENDANTS' FIRST SUPPLEMENTAL AND AMENDED OBJECTIONS AND
RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES TO
DEFENDANTS**

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.





Interrogatory 11. Identify all “features,” controls or aspects of Meta’s Products available to or for under-18 Users of Meta’s Products that You contend (1) enable those Users to restrict the availability of their content to others, (2) enable those Users to restrict the types or frequency of content displayed to them, or (3) were otherwise implemented to promote youth wellbeing or guard against misuse or abuse of Your Products with respect to underage users. For each feature, identify the date it was implemented and where the feature may be found by a User.

RESPONSE: Meta incorporates its Recurring Specific Objections by reference as though fully set forth herein. Meta objects to this Interrogatory on the grounds that it is overly broad and seeks to impose an undue burden on Meta that is not proportional to the needs of the case, particularly to the extent that it asks Meta to “[i]dentify all ‘features,’ controls or aspects of Meta’s Products available to or for under-18 Users of Meta’s Products” and “identify the date it was implemented.” *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). In addition, Meta objects to this Interrogatory on the grounds that it is not limited to the relevant

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time period or New Mexico. *See* Rule 1-026(B)(1) (limiting permissible discovery to relevant information). Meta further objects to this Interrogatory as vague and ambiguous in its use of the undefined phrases “controls,” “aspects,” and “found by a User.” *Id.* (requirement to provide “responsive information” implies a clearly stated request).

Subject to and without waiving the foregoing objections, Meta provides the following response to Interrogatory No. 11:

A description of how a given tool operated at a moment in time should not be construed as a description of how it operated at all times or as a representation that it was not modified or deprecated at a later time. Headings are for organizational purposes only; a heading should not be construed as referring to only a single tool, feature, or resource, or update thereto, and also should not be construed as referring to an official name of a given tool, feature, or resource. Each listed tool, feature, or resource may be found, or was found, within Instagram and/or Meta’s online resources. Meta’s investigation is ongoing, and Meta reserves the right to supplement its response.

Delete Comments

An Instagram user may delete unwanted comments left by third parties on the user’s posts. Instagram users have been able to delete third-party comments on their posts since at least August 2012. All Instagram users may delete unwanted comments. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Safety Foundations Experiences Platform team.

Turn Off Commenting

Instagram users may turn off comments, preventing people from commenting on any individual post. When a user turns off commenting on an existing post, any comments that are currently on the post will be hidden; if commenting is reenabled, previous comments will be

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restored and people will be able to comment again. Instagram users may also turn off commenting for a post prior to sharing. The option to turn off commenting was extended to all Instagram users in December 2016. The option to turn off commenting on a per-post basis was introduced in April 2024. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Safety Foundations Experiences Platform team.

Offensive Comment Filter

Instagram employs a filter that will block certain offensive comments on posts and in live video. This feature was launched in English starting in June 2017. The feature was updated in October 2020 to automatically hide comments similar to others that have been reported; users may view these comments by tapping “View Hidden Comments.” Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Safety Foundations Experiences Platform team.

Comment Controls (i.e., “Who Can Comment”)

Instagram users can control who can comment on their posts. For a “private” account, only people who follow the user may comment on that user’s posts. For a “public” account, a user may allow all other users to comment on their posts or allow comments only from people the user follows and/or the user’s followers. For both public and private accounts, users may turn off commenting to prevent people from commenting on an individual post and block specific accounts from commenting on their posts. Instagram launched the ability for users with public accounts to choose who can comment on their posts, as well as the ability for all users to block other accounts from commenting on their posts, in September 2017. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Safety Foundations Experiences Platform team.

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Bullying Filter (Comments)

Instagram automatically filters bullying comments intended to harass or upset users. The filter hides comments containing attacks on a user's appearance or character, as well as threats to a user's well-being or health. The filter alerts Instagram to repeated problems so Instagram can take action. Users may choose to disable this filter. The bullying filter was launched in May 2018. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Safety Foundations Experiences Platform team.

Comment Warnings

Instagram automatically notifies a user when a comment they have drafted might be considered offensive. When someone tries to post a potentially offensive comment, Instagram shows them a warning reminding them of Instagram's Community Guidelines and letting them know that Instagram may remove or hide their comment if they proceed. This intervention is designed to give users a chance to reflect and undo their comment. Comment warnings were launched in July 2019. Under "tiered warnings," if a commenter continues to post comments that might be offensive, Instagram displays additional warnings communicating potential consequences of their behavior. Tiered warnings launched in December 2020. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Safety Foundations Experiences Platform team.

Restrict

Restrict is a tool that a user can activate to mediate their interactions with another user. Once a user enables Restrict for a specific account, the comments on their posts from the restricted account will only be visible to the restricted user. The user can choose to view the comments from the restricted user by tapping "See Comment" and can approve the comment for

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others to *see* or delete the comment. Once a user restricts another account, direct messages from the restricted account will appear in a Message Request folder. The user will be able to view these messages from the restricted account in the Message Request folder, but the restricted account will not be able to *see* whether the user read their message or when the user is active on Instagram. A user will not receive any notifications regarding the activity of an account that they restrict. A user can un-restrict an account at any time. These features allow users to restrict comments and messages from specific accounts launched on October 2, 2019.

On May 30, 2024, Instagram expanded Restrict to prevent restricted accounts from tagging or mentioning a user in the restricted account's posts and from remixing the user's Reels. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Safety Foundations Experiences Platform team.

Tags and Mentions Tools

On May 12, 2020, Instagram announced a new tool that allowed users to manage who can tag or mention them on Instagram. Using this tool, the user can choose whether they want everyone, only people they follow, or no one to be able to tag or mention the user in a comment, caption, or Story. This tool is not a default setting; users can turn it on and off. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Safety Foundations Experiences Platform team.

Smart Defaults: Teen DM Restrictions

On January 25, 2024, Meta announced an additional safety enhancement for U16 users for the Instagram Direct Messenger ("IGD") function and the Messenger platform. This change implemented a new default setting where teens could only be messaged or added to group chats by people they already followed or were connected to. New teen users are opted into this

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protection at account creation. Without purporting to identify all such teams, a team involved in the foregoing is the Messenger & Instagram Direct team.

Teen DM Safety Notice

On March 17, 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 young people 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. Without purporting to identify all such teams, a team involved in the foregoing is the Messenger & Instagram Direct team.

Hidden Words (DM requests)

On April 21, 2021, Meta introduced a new tool to filter abusive messages in the Instagram Direct Message request inbox. This tool, when turned on, automatically filters Direct Message requests that contain offensive words, phrases, and emojis, so that a user would not *see* them. In collaboration with anti-discrimination and anti-bullying organizations, Meta developed a predetermined list of terms that the tool would automatically filter when turned on. Users also have the option to create a customized list of offensive terms. The offensive terms are then automatically filtered into a hidden requests folder, from where users have the option to view, delete, or report the message request. Without purporting to identify all such teams, a team involved in the foregoing is the Messenger & Instagram Direct team.

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Sensitive Content Control (Explore)

On July 20, 2021, Instagram launched Sensitive Content Controls to allow users to decide how much “sensitive content” is displayed in the Explore feed. Sensitive content is defined as “as posts that don’t necessarily break our rules but could potentially be upsetting to some people – such as posts that may be sexually suggestive or violent.” Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Well-being Product team.

Smart Defaults: Private By Default (new U16s)

On July 27, 2021, Instagram launched Private by Default, a tool that defaulted new Instagram users under 16 years old into a private account when they joined Instagram and showed notifications to existing teen users on Instagram that highlighted the benefits of a private account and explained how to change their privacy settings. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Well-being Product team.

Limit Unwanted Interactions (Comments; DMs)

On August 10, 2021, Instagram announced a set of new tools to help protect people from abuse on Instagram. One of these tools, called Limits, allows users to limit comments and direct message requests. If Limits is turned on, Instagram automatically hides comments and direct messaging requests from people who do not follow the user, or who only recently followed the user. Without purporting to identify all such teams, a team involved in the foregoing is the Youth Protections Product Management team.

Family Center

Family Center provides parents and guardians access to supervision tools and resources from leading experts. Family Center’s features, and resources include the following:

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- **Family Center - Teen reporting notifications:** The teen reporting notifications tool allows parents to receive notifications when teens report a user to Meta. If a teen chooses to share the fact that they have reported someone with their supervising parent, the supervising parent will *see* (1) the name of the account that was reported, and (2) the category of the report (such as bullying, harassment). There is accompanying information provided to parents in the supervision experience on Instagram about the reporting process and advice from experts on related teen safety issues.
- **Family Center - Teen Follows:** The ability to *see* the individuals that their teen follows.
- **Family Center - Teen Followers:** The ability to *see* which individuals follow their teens.
- **Family Center - Teen Time Spent:** This is a feature in the parental supervision experience that allows parents or guardians to view the time that their teen has spent on Instagram across devices. The user experience consists of a rolling 7-day chart reflecting daily usage of Instagram over the prior week, as well as the average daily time spent on Instagram over the prior week.
- **Family Center - Time limits and Set Specific Times of Use:** These features permit a parent or guardian to set a daily time limit for their teen on Instagram, as well as set specific times of day when a teen is permitted to use the platform, which is displayed as a “scheduled break.”
- **Family Center - Education Hub:** Family Center also includes an education hub where parents and guardians can access resources from experts and review helpful articles, videos, and tips on how to use supervision tools and on topics like how to talk to teens about social media.

Family Center launched on Instagram on March 22, 2022.

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Without purporting to identify all such teams, a team involved in the foregoing Family Center tools is the Central Social Impact - Youth Product Management team.

New DM Privacy Features

On June 27, 2023, Meta announced that it was testing a new tool to limit how people can interact with others who do not follow them. Users will only be able to send text messages to others who do not follow them and would not be able to send media when messaging unconnected users to connect on Instagram. Without purporting to identify all such teams, a team involved in the foregoing Family Center tools is the Central Social Impact - Youth Product Management team.

Stricter Teen Content Recommendation Default

On January 9, 2024, Meta announced updates to its recommendation settings for teens. Specifically, under-16 teens already on Instagram would be automatically placed in the most restrictive content control settings. This tool makes it difficult for Young Users to come across potentially sensitive content or accounts. Without purporting to identify all such teams, a team involved in the foregoing is the Youth Protections Product Management team.

Single-Tap Teen Safety & Privacy Settings Prompts

On January 9, 2024, Meta announced that it was prompting teen users to update their privacy settings on Instagram in a single tap with new notifications. Without purporting to identify all such teams, a team involved in the foregoing is the Youth Protections Product Management team.

Smart Defaults: Stricter DM Defaults for U16s

On January 25, 2024, Meta announced default message settings for teens under 16 on Instagram. Under the new default settings, which was automatically turned on for users under 16, users with the default settings can only be messaged or added to group chats on Instagram by

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people—including other teens—they already follow or are connected to. Parents using supervision will be prompted to approve or deny their under-16 teens' requests to change their default safety and privacy settings to a less strict state, rather than just being notified of the change. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Well-being Product team.

Anonymous Reporting for Live Video

On September 26, 2017, Meta began offering Instagram users the option to anonymously report Live broadcasts. Users can choose from a number of Community Guidelines violation types, including self-harm, suicide, physical abuse, bullying or harassment, child abuse or endangerment, and threats of real-world violence. Upon such a report, the Live broadcaster will *see* a message offering three options for support: (1) talking with a helpline volunteer; (2) viewing suggestions for supporting oneself; and (3) calling or texting a friend. The only violation type for which a user's report is not anonymous is intellectual property infringement.

To make an anonymous report, a user must (1) expand the feedback interface icons; (2) click the 3 dots; and (3) click "report" to enter the reporting flow. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Stories Consumption team.

Hide Likes & Views

Hiding public like counts was implemented as an opt-in feature for all Instagram users, on May 26, 2021. Users can hide like counts on all posts that appear in their feed. Users can also hide like counts on the posts they create, so that other users viewing those posts will not be able to *see* how many likes they have garnered – although the posting user will still be able to *see* the number of likes on their own post. Instagram users can also hide the like counts they *see* for other

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users' posts. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Well-being Product Team.

Restricting People from Tagging or Mentioning Teens They Do Not Follow

On December 7, 2021, Instagram announced that it was turning off the ability for people to tag or mention teens who do not follow them, or to include their content in Reels Remixes or Guides, by default when a user first joins Instagram. Specifically, the new default settings introduced were:

- Only people whom the teen account follows could tag them.
- Only people whom the teen account follows could mention them.
- No one could put a teen account's content in a Guide.
- Only people whom the teen account follows can remix their Public Reels.

Without purporting to identify all such teams, a team involved in the foregoing is the Youth Protections Product Management Team.

Your Activity

Your Activity is a user experience launched on February 8, 2022 that allows Instagram users to view and manage their activity on Instagram in a single place. Using Your Activity, Instagram users can take the following actions: (1) view time spent on Instagram per day; (2) archive multiple shared posts at once; (3) delete multiple shared photos and reels at once; (4) edit and delete highlights; (5) review and delete multiple likes and comments at once; (6) view and manage posts in which they have been tagged; (7) view and manage their account history; (8) view and clear their recent search history; (9) view their recent link history; (10) view and manage recently deleted and archived content; (11) view advertisements they have recently interacted with; (12) view and manage reviews they have left for purchases on Instagram; and (13) download a

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copy of all information they have shared on Instagram. Testing for Your Activity began in December 2021.

Your Activity expanded upon the initial Your Activity tool launched on August 1, 2018, which allowed Instagram users to view and manage their time spent on Instagram per day. The Your Activity time spent controls allow an Instagram user to view their average time spent on Instagram during the previous week as a 7-day bar graph. Users can tap any bar to view their time spent on Instagram for the respective day. Time spent is measured based on the device with which the user accesses the dashboard. Below the graph itself, users are provided multiple options for managing their time on Instagram. Users are provided options to set a daily reminder for themselves once their time spent on Instagram has met a self-selected limit and to set reminders for themselves to take regular breaks after a self-selected amount of uninterrupted time on Instagram. Additionally, users are provided a link directly to their push notification settings, where they will be able to limit push notifications for a specified period of time.

Without purporting to identify all such teams, a team involved in the foregoing is the Youth Protections Product Management Team.

Favorites

Meta launched Favorites on March 23, 2022. It is a separate view from Feed that allows users the option to view the latest posts, in chronological order, from up to 50 accounts of their choosing. Users can make changes to their “Favorites” list at any time.

Following

Meta launched Following on March 23, 2022. It is a separate view from Feed that allows users the option to view posts from other users that the viewing user follows, in chronological

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order of posting. Without purporting to identify all such teams, two teams involved in the foregoing are the Instagram Core Feed Experience and Instagram Sharing Product team.

Take a Break: Reels Nudge

On June 14, 2022, Meta launched nudges within Reels to notify users to turn on the Take a Break tool. The Take a Break tool was designed to remind users to take a break from using Instagram. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Well-being Product Team.

Alternative Topic Nudge

On June 14, 2022, Meta launched Alternative Topic Nudges to encourage Young Users to switch to a different topic when they have repeatedly viewed the same kind of content in Instagram Explore. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Trust & Safety Content Product team.

Updated Age Verification Requirements

In December 2019, Meta began requiring all new Instagram users to enter their date of birth during the registration process. In May 2022, Meta began requiring users who had not previously provided a date of birth to provide a date of birth in order to continue using their Instagram account. In June 2022, Meta began requiring Instagram users to verify their age if they attempt to edit their date of birth from under-18 to 18-or-over. To assist with Meta's age verification efforts, Meta partners with Yoti, a company that offers privacy-preserving methods for verifying age. Beginning in June 2022, Meta began allowing users to verify their age by uploading a video "selfie," which is then sent to Yoti for age verification using Yoti's age estimation technology. Meta also offers users the option to verify age by uploading an ID, such as a driver's license or ID card.

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Yoti's age prediction technology estimates a person's age based on their facial features. The technology is trained on datasets of anonymous images of diverse people from around the world who have transparently allowed Yoti to use their data, and who can ask Yoti to delete their data at any time. Once Yoti provides Meta with an age estimation for a user, both Meta and Yoti delete the image. Without purporting to identify all such teams, a team involved in the foregoing is the Central Social Impact - Youth Product Management team.

Ad Topic Controls for Teens

On January 10, 2023, Meta announced the ability for teens to manage the types of ads they *see* on Instagram with the Ad Topic Controls tool. While Meta already prohibits certain ad topics to be shown to teen users, like alcohol, financial products, and weight loss products, with Ad Topic Controls, teens can further choose to *see* fewer ads relating to specific topics. Without purporting to identify all such teams, a team involved in the foregoing is the Responsibility & Privacy Product Management team.

Quiet Mode

On January 19, 2023, Meta launched Quiet Mode for Instagram to help users focus and set boundaries with their contacts. Once activated, Quiet Mode disables all notifications and sends an automatic reply when the user receives a direct message. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Youth Protections Product team.

Nighttime Nudge and New Nighttime Nudge for Teens

On January 19, 2023, Meta launched Nighttime Nudge for Teens to prompt Young Users to enable Quiet Mode after certain use during nighttime hours. On January 18, 2024, Meta implemented new nudges to encourage Young Users to close the app after spending more than ten

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minutes scrolling Reels or in Direct Messages at night. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Youth Protections Product team.

Not Interested

On January 19, 2023, Meta launched Not Interested to enable users to control what they *see* on Instagram. With Not Interested, users can choose to hide content that they do not want to see, and Instagram will be set to avoid recommending such content in the user's Explore, Reels, and Search pages. Additionally, with the Not Interested tool, users can add a word or list of words, emojis, or hashtags, and Instagram will be set to no longer recommend content containing those words, emojis, or hashtags. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Trust & Safety Product team.

DM Nudity Protection Default for U18s

On April 11, 2024, Meta began testing a new nudity protection tool in Instagram Direct Messages, which would automatically blur nude images and encourage users to reconsider sending nude images. This tool will be turned on by default for teens under 18. When nudity protection is turned on, 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 they 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. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Well-being Product Team.

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Like Comments

On December 6, 2016, Instagram announced the launch of Comment Liking, which allows users to like comments by tapping a heart icon next to any comment. Comment Liking allows users to show support and encourages positivity throughout the community. Without purporting to identify all such teams, a team involved in the foregoing is the Product Management, Instagram Creators team.

Kindness Stickers

In September 2017, Instagram announced six new kindness-themed heart-shaped stickers created by artists from the global community. Users can superimpose these stickers on photos or videos in their stories to turn those photos and videos into visual expressions of kindness. Any user can click a kindness sticker to learn about the artist who created it. In September 2017, Meta also announced a partnership with artists from the global community to paint colorful murals around the world inspiring Kind Comments on Instagram. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Well-being Product team.

“Create Don’t Hate” Sticker in Stories

On October 2, 2019, Meta announced the launch of a “Create Don’t Hate” sticker that users can add to their stories in Instagram. The “Create Don’t Hate” sticker calls on the community to share how they can use their creative talents to take a proactive stand against bullying. When a user sees a story containing the “Create Don’t Hate” sticker, they can tap on the sticker, which triggers a bottom sheet stating Instagram’s commitment to stand against online bullying and encouraging the viewer to use the sticker to stand up to bullying, support a friend, or spread positivity on Instagram. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Well-being Product team.

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Support Requests

On February 11, 2020, Meta announced the launch of Support Requests, a tool that shows users the status of their submitted reports, as well as their report history. To *see* reports, a user can go to “Settings” in Instagram and then tap “Support Requests.” From there, they can tap any report to *see* more information about its status. A user can also tap “More Options” for suggested actions to take, like muting, blocking, restricting, or unfollowing the user whose content they reported. If the user disagrees with the action Meta has taken on the content they reported, the user can tap “Request a Review” to request that Meta take a second look at the report. Without purporting to identify all such teams, a team involved in the foregoing is the Product Management, Cross Integrity team.

Stronger Comment Warnings

On August 10, 2021, Instagram announced stronger comment warnings. These stronger warnings show a user a warning reminding them of Meta’s Community Guidelines and warning them that Meta may remove or hide their comment if they proceed, the first time the user tries to post a potentially offensive comment. Previously, Meta provided these warnings the second or third time the user posted a potentially offensive comment. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Bullying & Harassment team.

Be Kind Nudges (Comments)

On October 20, 2022, Meta announced kindness nudges for comments. These nudges are notifications that encourage a user to pause and reconsider before responding to a potentially offensive comment. This tool was developed to reduce the amount of harmful comments on Instagram because users can mean well but misjudge the negative effects of their comments.

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Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Bullying & Harassment team.

Daily Limit

On August 1, 2018, Meta announced new time management tools for Instagram. One of the tools was Daily Limit, which allowed users to receive an alert upon reaching the predetermined amount of time they planned to spend on Instagram. On July 9, 2024, Meta announced updates to the Daily Limit tool. Meta added a reminder to tell users that their daily limit was approaching and gave them the option to snooze it. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Supervision Team.

Mute Push Notifications

On August 1, 2018, Meta announced new time management tools for Instagram. One of the tools was Mute Push Notifications, which allowed users to limit Instagram notifications for a period of time. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Well-being Product team.

Take a Break

On December 7, 2021, Meta announced the launch of Take A Break, a tool to empower people to make informed decisions about how they are spending their time. Take a Break is an optional setting that a user can turn on. When activated, if a user has been on Instagram for a certain amount of time set by their own choosing, that user will receive a notification asking them to take a break from Instagram and suggesting that they can edit reminders to take more breaks in the future. Instagram will also show the user expert-backed tips to help them reflect and reset. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Supervision Team.

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Hidden Words (Comments)

Instagram has allowed users to automatically filter out or hide offensive or inappropriate comments without deleting or reporting the comments. Instagram removes comments that violate the Community Guidelines. By default, Instagram filters out comments that are highly likely to be offensive or spam (except when the comment is made by a mutual follower of the user who posted the media); these filtered comments are visible to the commenter only, and comments hidden by default may be unhidden by the posting user. Users may opt out of this default setting.

Users have been able to opt-in to advanced comment filtering, which automatically filters out even more comments that may be spam or may contain offensive words or phrases. Users have also had the option to input custom words or phrases, numbers, or emojis to be filtered out and hidden. Comment keyword filters were implemented for all users in September 2016. In June 2017, Instagram expanded the default filter to block additional offensive comments.

In May 2018, Instagram began automatically filtering bullying comments intended to harass or upset users. The filter hid comments containing attacks on a user's appearance or character, as well as threats to a user's well-being or health. In October 2020, Instagram began to automatically hide comments similar to others that have been reported; users were given the ability to view these hidden comments by tapping "View Hidden Comments." Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Safety Foundations Experiences Platform team.

Caption Warnings

On December 16, 2019, Instagram launched Caption Warnings to give users a chance to reconsider before posting offensive captions. This tool uses artificial intelligence to detect potentially offensive captions that are similar to captions previously reported for bullying. A user

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will receive a notification that their caption is similar to captions that were previously reported and is given the choice to edit the caption before posting or sharing. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Safety Foundations Experiences Platform team.

Manage Comments

All Instagram users may delete comments in bulk, as well as block or restrict accounts that post negative comments. If a user “restricts” another account, any new comments from the restricted commenter do not appear on the user’s post (unless the user reviews and approves the comment). Users may delete up to 25 comments at a time. This feature was launched in May 2020. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Safety Foundations Experiences Platform team.

Pinned Comments

All Instagram users may pin a number of comments to the top of their comments thread. The pinned comments feature allows users to set the tone for their account by selecting comments to be displayed at the top of their comments thread. Instagram announced the pinned comments feature in May 2020, with the feature implemented by October 2020. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Bullying & Harassment team.

Stopping Unwanted Content

On July 27, 2021, Meta announced a tool to stop unwanted contact between Young Users and potential adult violators. Meta makes it difficult for adults who have engaged in “potentially suspicious behavior” to find accounts belonging to Young Users. Potentially suspicious behavior includes being reported or blocked by an account belonging to a young person. Instagram

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developed technology that would prevent adults with potentially suspicious behavior from discovering accounts belonging to Young Users in Reels, Explore, or “Accounts Suggested For You.” These adults will be unable to follow accounts belonging to Young Users by searching the username. Additionally, suspicious adults are unable to *see* comments from Young Users on other people’s posts or leave comments on young people’s posts. Without purporting to identify all such teams, a team involved in the foregoing is the Central Social Impact - Youth Product Management team.

Be Kind Nudges (DMs)

On October 20, 2022, Meta introduced a tool to remind users to be respectful to creators and other people they may not know when sending direct message requests. This tool is a nudge that encourages respectful interactions and reminds users that there is a real person on the other side of the direct message request. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Well-being Product team.

Manually Hide Comments Option

Instagram users have the option to manually hide comments they might find upsetting or unwelcome. All users may manually hide comments under their own posts. Manually hidden comments are only visible to the commenter and the user who hid the comment (if that user “unhides” the comment). Other users cannot *see* the comment once it has been hidden, and the commenter is not notified that their comment has been hidden. The user may manually unhide a comment after it has been hidden. This feature was launched in October 2023. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Bullying & Harassment team.

Dedicated Option for Removing Eating Disorder Content

Instagram users can report a profile or content for specific categories of harm, including eating disorders. Meta launched the dedicated option for reporting eating disorder content in May 2021. Meta removes content that promotes or encourages eating disorders.

Removing Followers

On December 21, 2016, Instagram announced an option for holders of private accounts (i.e., accounts where the account holder approves each follower) to remove followers they had previously approved. Before the launch of this option, holders of private accounts could not easily undo their decision to approve a follower without blocking them. To use this feature, users must (1) click their profile picture to go to their profile page; (2) click “Followers”; and (3) click “Remove” to the right of the follower the user would like to remove. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Growth, Connections team.

Mute

On May 22, 2018, Meta announced the launch of Mute in Instagram Feed, which gives users the option to exercise more control over the posts they *see* on Instagram. Mute allows users to hide posts or stories in their Feed, as well as incoming messages, from selected accounts without unfollowing those accounts. When an Instagram user mutes an account, the user will still be able to *see* posts on the muted account’s profile page and will be notified about comments or posts by the muted account in which they are tagged. Instagram does not notify a user that another user has muted them. Instagram users can access the option to mute posts and stories from both Feed and the profile page of the account the user desires to mute. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Bullying & Harassment team.

Multi-Block

On April 21, 2021, Meta announced updates to the blocking tool to give users the option to both block another user's account and preemptively block new accounts that person may create. On October 20, 2022, Instagram again expanded the blocking tool to allow users to choose to block all other accounts the person may already have. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Bullying & Harassment team.

Teen Accounts

On September 17, 2024, Meta introduced Teen Accounts, a new experience for teens. Teen Accounts have built-in protections which limit who can contact teens and the content they see, and also provide new ways for teens to explore their interests. All teenagers under 18 years old will automatically be placed in Teen Accounts, and teens under 16 years old (i.e., from 13 to 15 years old) will need parental permission to change any of the settings to be less strict. To get parental permission, teens will need to set up parental supervision on Instagram. The default protections that are automatically turned on for Teen Accounts include:

- **Default Private Accounts:** With default private accounts, teens need to accept new followers and people who do not follow them cannot *see* their content or interact with them. This applies to all teens under 16 (including those already on Instagram and those signing up) and teens under 18 when they sign up for the app.
- **Messaging Restrictions:** Teens will automatically be placed in the strictest messaging settings, so they can only be messaged by people they follow or are already connected to.
- **Sensitive Content Restrictions:** Teens will automatically be placed into the most restrictive setting of sensitive content control, which limits the types of sensitive content teens *see* on Instagram.

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- **Limited Interactions:** Other users will only be able to tag or mention a teen user if they follow the teen.
- **Hidden Words:** Meta will automatically filter out offensive words and phrases from the comments and message requests teens *see* on Instagram.
- **Time Limit Reminders:** Teens will get notifications telling them to leave Instagram after 60 minutes each day.
- **Sleep Mode Enabled:** Meta will automatically turn on Sleep Mode between 10:00 PM and 7:00 AM, which will mute notifications overnight and send automatic replies to messages, for Instagram teen users.

Within the Teen Account experience, teens will get access to a new feature allowing them to select topics they want to *see* more of in Explore and their recommendations. Without purporting to identify all such teams, a team involved in the foregoing is the Instagram Trust and Safety Team.

SUPPLEMENTAL RESPONSE: Subject to and without waiving the foregoing objections, Meta provides the following supplemental information:

Meta's public website provides instructions on how to access or use many safety tools, features, and resources on Instagram. Links to webpages with instructions or explanations are listed below. Meta's Instagram account provides pinned video and image tutorials demonstrating how to navigate many of these tools, features, and resources. Links to these tutorials are also listed below to the extent they are available. Headings are for organizational purposes only; a heading should not be construed as referring to only a single tool, feature, or resource, or update thereto, and also should not be construed as referring to an official name of a given tool, feature, or resource.

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- Delete Comments
 - <https://help.instagram.com/631948184906507>
- Hidden Words (Comments)
 - <https://help.instagram.com/700284123459336>
 - https://www.instagram.com/s/aGlnaGxpZ2h0OjE3OTE0MjU2MjUyMTYxNjA4?story_media_id=3019335753131212216&igsh=MzRlODBiNWFlZA==
- Turn Off Commenting
 - <https://help.instagram.com/1766818986917552>
- Bullying and Offensive Comment Filter
 - <https://help.instagram.com/700284123459336>
- Comment Controls (i.e., “Who Can Comment”)
 - <https://help.instagram.com/289376615404536>
- Comment Warnings
 - <https://about.instagram.com/blog/announcements/instagrams-commitment-to-lead-fight-against-online-bullying>
- Restrict
 - <https://help.instagram.com/2638385956221960>
- Caption Warnings
 - <https://about.instagram.com/blog/announcements/our-progress-on-leading-the-fight-against-online-bullying>
- Manage Comments
 - <https://help.instagram.com/289376615404536>
- Tags and Mentions Tools

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- <https://help.instagram.com/627963287377328/>
- https://www.instagram.com/s/aGlnaGxpZ2h0OjE3OTE0MjU2MjUyMTYxNjA4?story_media_id=3068559536683282253&igsh=MzRIODBiNWF1ZA==
- Smart Defaults: Teen DM Restrictions
 - <https://about.fb.com/news/2024/01/introducing-stricter-message-settings-for-teens-on-instagram-and-facebook/>
- Teen DM Safety Notice
 - <https://about.instagram.com/blog/announcements/continuing-to-make-instagram-safer-for-the-youngest-members-of-our-community>
- Hidden Words (DM requests only)
 - https://help.instagram.com/700284123459336/?helpref=uf_share
 - https://www.instagram.com/s/aGlnaGxpZ2h0OjE3OTE0MjU2MjUyMTYxNjA4?story_media_id=3019335753131212216&igsh=MzRIODBiNWF1ZA==
- Sensitive Content Control (Explore only)
 - <https://help.instagram.com/251027992727268>
 - https://www.instagram.com/s/aGlnaGxpZ2h0OjE3OTE0MjU2MjUyMTYxNjA4?story_media_id=3019335714669534077&igsh=MzRIODBiNWF1ZA==
- Smart Defaults: Private By Default (new U16s)
 - <https://help.instagram.com/448523408565555>
- Stopping Unwanted Contact
 - <https://help.instagram.com/2638385956221960>
- Temporarily Limit Unwanted Interactions (Comments; DMs)
 - <https://help.instagram.com/4106887762741654>

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- Family Center Tools
 - <https://help.instagram.com/309877544512275>
- Be Kind Nudges (DMs)
 - <https://about.instagram.com/blog/announcements/creator-safety-tools>
- Manage Message Requests (New DM Privacy Features)
 - <https://help.instagram.com/585369912141614>
- Manually Hide Comments Option
 - <https://help.instagram.com/700284123459336>
- Stricter Teen Content Recommendation Default (existing U18s)
 - <https://about.fb.com/news/2024/01/teen-protections-age-appropriate-experiences-on-our-apps/>
- Single-Tap Teen Safety & Privacy Settings Prompts
 - <https://about.instagram.com/blog/announcements/continuing-to-make-instagram-safer-for-the-youngest-members-of-our-community>
 - <https://about.fb.com/news/2024/01/teen-protections-age-appropriate-experiences-on-our-apps/>
- Smart Defaults: Stricter DM Defaults for U16s
 - <https://about.fb.com/news/2024/01/introducing-stricter-message-settings-for-teens-on-instagram-and-facebook/>
- Anonymous Reporting for Live Video
 - <https://help.instagram.com/163366675115842>
- Dedicated Option for Reporting Eating Disorder Content
 - <https://help.instagram.com/567449254552862>

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- Hide Likes & Views
 - <https://help.instagram.com/113355287252104>
- Restricting People from Tagging or Mentioning Teens They Do Not Follow
 - <https://help.instagram.com/345505572238391>
- Your Activity
 - <https://help.instagram.com/647230196639835>
- Favorites
 - <https://help.instagram.com/664109784733070>
 - https://www.instagram.com/s/aGlnaGxpZ2h0OjE3OTE0MjU2MjUyMTYxNjA4?story_media_id=3068559536792284418&igsh=MzRIODBiNWF1ZA==
- Following
 - <https://help.instagram.com/505299634436870>
 - https://www.instagram.com/s/aGlnaGxpZ2h0OjE3OTE0MjU2MjUyMTYxNjA4?story_media_id=3068559536792284418&igsh=MzRIODBiNWF1ZA==
- Take a Break
 - https://www.instagram.com/s/aGlnaGxpZ2h0OjE3OTE0MjU2MjUyMTYxNjA4?story_media_id=3019335734491667008&igsh=MzRIODBiNWF1ZA==
- Alternative Topic Nudge
 - <https://help.instagram.com/544650263825365>
- Confirming Age on Instagram
 - <https://help.instagram.com/966909308115586>
- Ad Topic Controls for Teens
 - <https://www.facebook.com/help/instagram/245100253430454>

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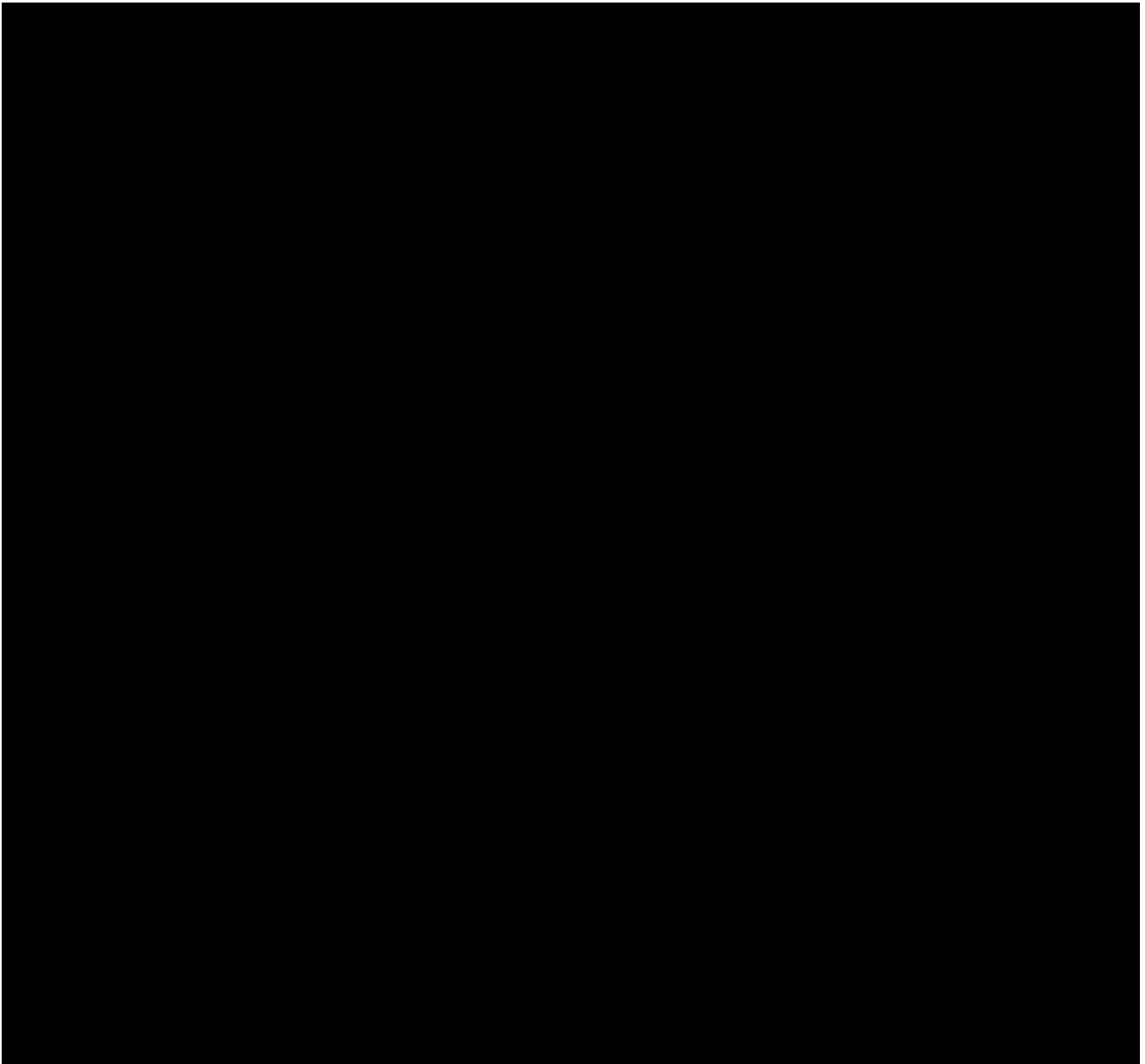
- <https://www.facebook.com/help/109378269482053/>
- <https://about.instagram.com/blog/announcements/giving-young-people-a-safer-more-private-experience>
- Quiet Mode
 - https://www.instagram.com/s/aGlnaGxpZ2h0OjE3OTE0MjU2MjUyMTYxNjA4?story_media_id=3019335698663979640&igsh=MzRlODBiNWFlZA==
- Nighttime Nudge for Teens
 - <https://about.fb.com/news/2023/06/parental-supervision-and-teen-time-management-on-metas-apps/>
- Not Interested
 - <https://help.instagram.com/1105548539497125>
 - https://help.instagram.com/1105548539497125/?cms_platform=iphone-app&helpref=platform_switcher
 - https://help.instagram.com/1105548539497125/?cms_platform=android-app&helpref=platform_switcher
 - https://help.instagram.com/1105548539497125/?cms_platform=instagram-lite-app&helpref=platform_switcher
- DM Nudity Protection Default for U18s
 - <https://help.instagram.com/503437025160040/>
- Like Comments
 - <https://help.instagram.com/107009073121923>
- Remove Followers
 - <https://help.instagram.com/413012278753813>

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- https://www.instagram.com/s/aGlnaGxpZ2h0OjE3OTE0MjU2MjUyMTYxNjA4?story_media_id=3068559553066418711&igsh=MzRIODBiNWFIZA==
- Kindness Stickers
 - <https://help.instagram.com/151273688993748>
- Mute
 - <https://help.instagram.com/469042960409432>
 - https://www.instagram.com/s/aGlnaGxpZ2h0OjE3OTE0MjU2MjUyMTYxNjA4?story_media_id=3068559539132728050&igsh=MzRIODBiNWFIZA==
- “Create Don’t Hate” Sticker in Stories
 - <https://help.instagram.com/151273688993748>
- Support Requests
 - <https://help.instagram.com/165828726894770>
- Multi-Block
 - https://help.instagram.com/454180787965921/?cms_platform=iphone-app&helpref=platform_switcher
- Stronger Comment Warnings
 - <https://about.instagram.com/blog/announcements/introducing-new-ways-to-protect-our-community-from-abuse>
- Be Kind Nudges (Comments)
 - <https://about.instagram.com/blog/announcements/creator-safety-tools>
- Daily Limit
 - <https://help.instagram.com/2049425491975359>
- Limit Notifications

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- <https://help.instagram.com/105448789880240>
- Teen Accounts
 - https://help.instagram.com/995996839195964/?helpref=uf_share
 - https://www.instagram.com/s/aGlnaGxpZ2h0OjE3OTE0MjU2MjUyMTYxNjA4?story_media_id=3459094009580667363&igsh=MzRIODBiNWF1ZA==
 - <https://about.fb.com/news/2024/09/instagram-teen-accounts/>



Dated: February 13, 2025

Submitted by,

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CERTIFICATE OF SERVICE

I, John C. Anderson, hereby certify that on February 13, 2025, I caused a copy of the foregoing to be served via email and/or hand delivery on the following:

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

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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.

META PLATFORMS, INC.; INSTAGRAM, LLC; META
PAYMENTS, INC.; META PLATFORMS
TECHNOLOGIES, LLC; and
MARK ZUCKERBERG,

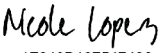
Defendants.

NO. D-101-CV-
2023-02838

**DEFENDANTS' VERIFICATION OF SUPPLEMENTAL RESPONSES TO THE
STATE'S FIRST SET OF INTERROGATORIES PURSUANT TO RULES 1-011 (B) and
1-33(C) NMRA**

I hereby declare that I am an authorized representative for Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., and Meta Platforms Technologies, LLC (collectively, “Meta”) and am authorized to make this verification on their behalf. The facts and information set forth in Meta’s Supplemental Responses to the State of New Mexico’s First Set of Interrogatories were assembled by employees of Meta from the company’s records and files, and from personal knowledge of the matters contained therein. Certain portions of the responses may be based not on my personal knowledge, but are based on reasonable inquiry and documents and information available to Meta, and have been prepared with the assistance of counsel based on the aforementioned information. I declare, under penalty of perjury under the laws of the state of New Mexico, that the information set forth in Meta’s Answers to Interrogatory No. 11 and all statements contained therein are true and correct.

Executed on January 17, 2025.

Signed by:

1F240B127547498...
Nicole Lopez
Global Director of Youth Safety Policy, Meta