

1 [Parties and Counsel Listed on Signature Pages]  
2  
3  
4  
5  
6  
7

8 UNITED STATES DISTRICT COURT

9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

12 This Document Relates To:

**AGENDA AND JOINT STATEMENT  
FOR APRIL 19, 2024, CASE  
MANAGEMENT CONFERENCE**

13 ALL ACTIONS

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

14  
15  
16  
17 Pursuant to Case Management Order (“CMO”) No. 1 (ECF 75), the Parties submit this agenda  
18 and joint statement in advance of the April 19, 2024, Case Management Conference (“CMC”).

19 **I. Update on Pending Motions**

20 **A. Motion to Dismiss Personal Injury Plaintiffs’ Claims Against Mark Zuckerberg**

21 On March 1, 2024, the Parties submitted supplemental briefing requested by the Court on  
22 Defendant Mark Zuckerberg’s motion to dismiss certain Personal Injury (“PI”) Plaintiffs’ claims against  
23 him in his individual capacity (ECF 518). *See* ECF 659, 660 (Defendants’ submissions); ECF 661  
24 (Plaintiffs’ submission). On April 4, 2024, the Parties submitted the Plaintiff Fact Sheets of certain  
25 Plaintiffs who are alleging claims against Defendant Mark Zuckerberg, as requested by the Court  
26 through Liaison Counsel.  
27  
28

**B. Motion to Dismiss Certain Non-Priority Claims of PI Plaintiffs**

On December 22, 2023, Defendants moved to dismiss the PI Plaintiffs' remaining "non-priority claims" (Counts 5, 12, 14, 16–18) asserted in the PI Plaintiffs' Second Amended Master Complaint. *See* ECF 516. The PI Plaintiffs filed their opposition on February 5, 2024. *See* ECF 597. Defendants filed their reply on February 26, 2024. *See* ECF 644. The Defendants and PI Plaintiffs will be prepared to argue this motion at the June 21, 2024, hearing. *See* ECF 728, CMO No. 12 at 6 (setting hearing).

**C. Motion to Dismiss AG Complaints, Consumer Protection Claims, and Misrepresentation Claims**

On December 22, 2023, Meta moved to dismiss the Multistate Attorneys General ("AGs") Complaint, the Florida AG's Complaint, and the PI Plaintiffs' Consumer Protection and Misrepresentation Claims (Counts 7-9). *See* ECF 517. Defendants YouTube, Snap, and TikTok joined Meta's motion to dismiss Count 7 of the PI Plaintiffs' Amended Master Complaint. *See* ECF 519. Plaintiffs filed their oppositions on February 5, 2024. *See* ECF 599; 600. On March 1, Meta filed its reply (*see* ECF 662), along with annotated versions of the AGs' and PI Plaintiffs' appendices and a further appendix setting forth its position on various state laws (ECF 662-1, 662-2, 662-3), as requested by the Court. *See* CMC Tr. at 87:10–13 (Feb. 23, 2024). The AGs filed a motion for leave to file annotated copies of Meta's state law appendices (ECF 701-2) which was granted by the Court. *See* ECF 728, CMO No. 12 at 4. The Meta Defendants and Plaintiffs are prepared to argue the entirety of the Motion to Dismiss the AG Complaints and PI Plaintiffs' Consumer Protection and Misrepresentation Claims at the April 19, 2024 CMC. *See* ECF 728, CMO No. 12 at 5 (setting hearing).

**D. Motion to Dismiss Claims Asserted in Certain PI Plaintiffs' SFCs Against Snap**

On January 12, 2024, Defendant Snap moved to dismiss claims under 18 U.S.C. §§ 2252 and 2252A (also known as the "Identified Counts") asserted in certain PI Plaintiffs' amended Short-Form Complaints pursuant to CMO No. 7 (ECF 479). *See* ECF 533. Those PI Plaintiffs filed their opposition on February 5, 2024. ECF 598. Defendant Snap filed its reply on February 15, 2024. ECF 613. The PI Plaintiffs and Snap will be prepared to argue this motion at the June 21, 2024, hearing. *See* ECF 728, CMO No. 12 at 6 (setting hearing).

1           **E.     Motion to Dismiss School District and Local Government Entity Plaintiffs’ Master**  
 2           **Complaint**

3           On February 5, 2024, Defendants moved to dismiss the claims asserted in the School District and  
 4           Local Government Entity (“SD/GE”) Plaintiffs’ Master Complaint (ECF 504). *See* ECF 601. The  
 5           SD/GE Plaintiffs filed their opposition on March 4, 2024. *See* ECF 668. Defendants’ reply is due on  
 6           March 25, 2024. *See* ECF 451. The Defendants and SD/GE Plaintiffs will be prepared to argue this  
 7           motion during the May 9, 2024, CMC. *See* ECF 728, CMO No. 12 at 6 (setting hearing).

8           **F.     Youngers Motion to Remand**

9           As allowed by the Court (CMO No. 8, ECF 581), on February 15, 2024, Plaintiff Joleen  
 10          Youngers filed a motion to remand (4:23-cv-00547-YGR, ECF 64); on March 11, 2024, Defendant Meta  
 11          filed its opposition to the motion to remand (*id.* at ECF 69); and on March 25, 2024, Plaintiff Youngers  
 12          filed her reply (*id.* at ECF 71). Plaintiff Youngers and Defendant Meta are prepared to argue the motion  
 13          at the April 19, 2024 CMC. *See* ECF 728, CMO No. 12 at 5 (setting hearing).

14          **II.    Bellwether Selection, Status Report on Plaintiff Fact Sheets Due 4/1, and Process for**  
 15          **Addressing Deficiencies**

16          Plaintiffs and Defendants will submit to the Court on April 15 their respective bellwether case  
 17          selections and briefing as to why their respective slates of cases are representative of the cases in this  
 18          MDL and why selection of such cases is productive to facilitating resolution of these proceedings. *See*  
 19          ECF 604, CMO No. 10 at 4. The PI/SD Plaintiffs and Defendants will be prepared to discuss selection  
 20          of the bellwether discovery pool at the April 19, 2024 CMC. *See* ECF 728, CMO No. 12 at 5 (setting  
 21          selection date). Pursuant to the Court’s Order at ECF 748, the PI/SD Plaintiffs who have not submitted  
 22          PFSs must do so by May 8, 2024, with Defendants then permitted to petition the Court to substitute, or  
 23          add, to the bellwether selections by May 15, 2024, *id.* at 4.

24          **III.   Discovery Management Conference Statement**

25          The Parties’ Discovery Management Conference Statement is being filed this same date. The  
 26          Parties will supply a copy to Judge Gonzalez Rogers’s chambers by email after the filing.

1 **IV. JCCP Status Update**

2 At a status conference on March 20, 2024, Judge Kuhl clarified the bellwether selection process  
3 for PI plaintiffs in the JCCP. Judge Kuhl confirmed her preference for random selection of plaintiffs  
4 based on certain categories of information and ordered counsel to meet and confer regarding definition  
5 of the categories. She further set an informal conference with the Parties for April 24, 2024, to discuss  
6 the procedures for selection of the PI bellwether discovery pool. Judge Kuhl currently anticipates she  
7 will randomly select 24 PI plaintiffs for bellwether discovery on June 17, 2024. To allow the parties to  
8 assess those plaintiffs for representatives of the overall plaintiff population, she ordered Defendants to  
9 produce account preservation snapshots for those plaintiffs by June 19, 2024. Any plaintiffs found to be  
10 unrepresentative will be replaced via another random draw on June 27, 2024. In December 2024, Judge  
11 Kuhl will narrow the bellwether pool to 10-12 cases for trial. She set a deadline of December 6, 2024,  
12 for the completion of bellwether fact discovery, with expert discovery to follow the same timeline as  
13 expert discovery in the MDL.

14 On March 20, 2024, Judge Kuhl heard argument on Defendants' motion to strike third-party  
15 predator, CSAM, and "challenges" allegations from the JCCP Personal Injury Plaintiffs' Master  
16 Complaint and from certain short-form complaints. Judge Kuhl ordered supplemental briefing on the  
17 motion and continued the hearing to April 24, 2024 for additional argument.

18 On March 27, 2024, Judge Kuhl issued an order sustaining Defendants' demurrer to the JCCP  
19 plaintiffs' Unruh Act (age and sex discrimination) claims without leave to amend, and sustaining  
20 Defendants' demurrer to the JCCP plaintiffs' non-product negligent failure to warn claims with leave to  
21 amend.

22 The Parties continue to meet and confer regarding Defendant Fact Sheets and accompanying  
23 implementation order.

24 The JCCP's next status conference is April 24, 2024.

25  
26 Respectfully submitted,

27 DATED: April 12, 2024

By: /s/ Lexi J. Hazam

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

LEXI J. HAZAM  
**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**  
275 BATTERY STREET, 29<sup>TH</sup> FLOOR  
SAN FRANCISCO, CA 94111-3339  
Telephone: 415-956-1000  
lhazam@lchb.com

PREVIN WARREN  
**MOTLEY RICE LLC**  
401 9th Street NW Suite 630  
Washington DC 20004  
Telephone: 202-386-9610  
pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER  
**SEEGER WEISS, LLP**  
55 CHALLENGER ROAD, 6<sup>TH</sup> FLOOR  
RIDGEFIELD PARK, NJ 07660  
Telephone: 973-639-9100  
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel

JENNIE LEE ANDERSON  
**ANDRUS ANDERSON, LLP**  
155 MONTGOMERY STREET, SUITE 900  
SAN FRANCISCO, CA 94104  
Telephone: 415-986-1400  
jennie@andrusanderson.com

Liaison Counsel

EMILY C. JEFFCOTT  
**MORGAN & MORGAN**  
633 WEST FIFTH STREET, SUITE 2652  
LOS ANGELES, CA 90071  
Telephone: 213-787-8590  
ejeffcott@forthepeople.com

JOSEPH VANZANDT  
**BEASLEY ALLEN**  
234 COMMERCE STREET  
MONTGOMERY, LA 36103

1 Telephone: 334-269-2343  
2 joseph.vanzandt@beasleyallen.com

3 Federal/State Liaisons

4 MATTHEW BERGMAN  
5 GLENN DRAPER  
6 **SOCIAL MEDIA VICTIMS LAW CENTER**  
7 821 SECOND AVENUE, SUITE 2100  
8 SEATTLE, WA 98104  
9 Telephone: 206-741-4862  
10 matt@socialmediavictims.org  
11 glenn@socialmediavictims.org

12 JAMES J. BILSBORROW  
13 **WEITZ & LUXENBERG, PC**  
14 700 BROADWAY  
15 NEW YORK, NY 10003  
16 Telephone: 212-558-5500  
17 jbilborrow@weitzlux.com

18 JAYNE CONROY  
19 **SIMMONS HANLY CONROY, LLC**  
20 112 MADISON AVE, 7TH FLOOR  
21 NEW YORK, NY 10016  
22 Telephone: 917-882-5522  
23 jconroy@simmonsfirm.com

24 ANDRE MURA  
25 **GIBBS LAW GROUP, LLP**  
26 1111 BROADWAY, SUITE 2100  
27 OAKLAND, CA 94607  
28 Telephone: 510-350-9717  
amm@classlawgroup.com

ALEXANDRA WALSH  
**WALSH LAW**  
1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: 202-780-3014  
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ  
**LEVIN SEDRAN & BERMAN, LLP**  
510 WALNUT STREET  
SUITE 500

1 PHILADELPHIA, PA 19106  
2 Telephone: 215-592-1500  
3 mweinkowitz@lfsbalw.com

4 Plaintiffs' Steering Committee Leadership

5 **RON AUSTIN**  
6 **RON AUSTIN LAW**  
7 400 MANHATTAN BLVD.  
8 HARVEY, LA 70058  
9 Telephone: 504-227-8100  
10 raustin@ronaustinlaw.com

11 **PAIGE BOLDT**  
12 **WALSH LAW**  
13 4 Dominion Drive, Bldg. 3, Suite 100  
14 San Antonio, TX 78257  
15 Telephone: 210-448-0500  
16 PBoldt@alexwalshlaw.com

17 **THOMAS P. CARTMELL**  
18 **WAGSTAFF & CARTMELL LLP**  
19 4740 Grand Avenue, Suite 300  
20 Kansas City, MO 64112  
21 Telephone: 816-701-1100  
22 tcartmell@wcllp.com

23 **SARAH EMERY**  
24 **HENDY JOHNSON VAUGHN EMERY PSC**  
25 600 WEST MAIN STREET, SUITE 100  
26 LOUISVILLE, KY 40202  
27 Telephone: 859-600-6725  
28 semery@justicestartshere.com

**CARRIE GOLDBERG**  
**C.A. GOLDBERG, PLLC**  
16 Court St.  
Brooklyn, NY 11241  
Telephone: 646-666-8908  
carrie@cagoldberglaw.com

**RONALD E. JOHNSON, JR.**  
**HENDY JOHNSON VAUGHN EMERY PSC**  
600 WEST MAIN STREET, SUITE 100  
LOUISVILLE, KY 40202  
Telephone: 859-578-4444

1 rjohnson@justicestartshere.com

2 SIN-TING MARY LIU  
3 **AYLSTOCK WITKIN KREIS &**  
4 **OVERHOLTZ, PLLC**  
5 17 EAST MAIN STREET, SUITE 200  
6 PENSACOLA, FL 32502  
7 Telephone: 510-698-9566  
8 mliu@awkolaw.com

9 JAMES MARSH  
10 **MARSH LAW FIRM PLLC**  
11 31 HUDSON YARDS, 11TH FLOOR  
12 NEW YORK, NY 10001-2170  
13 Telephone: 212-372-3030  
14 jamesmarsh@marshlaw.com

15 JOSEPH E. MELTER  
16 **KESSLER TOPAZ MELTZER & CHECK LLP**  
17 280 KING OF PRUSSIA ROAD  
18 RADNOR, PA 19087  
19 Telephone: 610-667-7706  
20 jmeltzer@ktmc.com

21 HILLARY NAPPI  
22 **HACH & ROSE LLP**  
23 112 Madison Avenue, 10th Floor  
24 New York, New York 10016  
25 Telephone: 212-213-8311  
26 hnappi@hrsclaw.com

27 EMMIE PAULOS  
28 **LEVIN PAPANTONIO RAFFERTY**  
316 SOUTH BAYLEN STREET, SUITE 600  
PENSACOLA, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

RUTH THI RIZKALLA  
**THE CARLSON LAW FIRM, PC**  
1500 ROSECRANS AVE., STE. 500  
MANHATTAN BEACH, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

ROLAND TELLIS  
DAVID FERNANDES  
**BARON & BUDD, P.C.**  
15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: 818-839-2333  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

MELISSA YEATES  
**KESSLER TOPAZ MELTZER & CHECK LLP**  
280 KING OF PRUSSIA ROAD  
RADNOR, PA 19087  
Telephone: 610-667-7706  
myeates@ktmc.com

DIANDRA “FU” DEBROSSE ZIMMERMANN  
**DICELLO LEVITT**  
505 20th St North  
Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205-855-5700  
fu@dicellolevitt.com

Plaintiffs’ Steering Committee Membership

*Attorneys for Individual Plaintiffs*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PHILIP J. WEISER**

Attorney General  
State of Colorado

/s/ Bianca E. Miyata

Bianca E. Miyata, CO Reg. No. 42012,  
*pro hac vice*  
Senior Assistant Attorney General  
Lauren M. Dickey, CO Reg. No. 45773  
First Assistant Attorney General  
Megan Paris Rundlet, CO Reg. No. 27474  
Senior Assistant Solicitor General  
Elizabeth Orem, CO Reg. No. 58309  
Assistant Attorney General  
Colorado Department of Law  
Ralph L. Carr Judicial Center  
Consumer Protection Section  
1300 Broadway, 7th Floor  
Denver, CO 80203  
Phone: (720) 508-6651  
bianca.miyata@coag.gov

*Attorneys for Plaintiff State of Colorado, ex rel.  
Philip J. Weiser, Attorney General*

**ROB BONTA**

Attorney General  
State of California

/s/ Megan O'Neill

Nicklas A. Akers (CA SBN 211222)  
Senior Assistant Attorney General  
Bernard Eskandari (SBN 244395)  
Supervising Deputy Attorney General  
Megan O'Neill (CA SBN 343535)  
Joshua Olszewski-Jubelirer(CA SBN 336428)  
Marissa Roy (CA SBN 318773)  
Nayha Arora (CA SBN 350467)  
Deputy Attorneys General  
California Department of Justice  
Office of the Attorney General  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102-7004  
Phone: (415) 510-4400  
Fax: (415) 703-5480  
Megan.Oneill@doj.ca.gov

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

*Attorneys for Plaintiff the People of the State of California*

**RUSSELL COLEMAN**  
Attorney General  
Commonwealth of Kentucky

*/s/ J. Christian Lewis*  
\_\_\_\_\_  
J. Christian Lewis (KY Bar No. 87109),  
*Pro hac vice*  
Philip Heleringer (KY Bar No. 96748),  
*Pro hac vice*  
Zachary Richards (KY Bar No. 99209),  
*Pro hac vice*  
Daniel I. Keiser (KY Bar No. 100264),  
*Pro hac vice*  
Matthew Cocanougher (KY Bar No. 94292),  
*Pro hac vice*  
Assistant Attorneys General  
1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601  
CHRISTIAN.LEWIS@KY.GOV  
PHILIP.HELERINGER@KY.GOV  
ZACH.RICHARDS@KY.GOV  
DANIEL.KEISER@KY.GOV  
MATTHEW.COCANOUGH@KY.GOV  
Phone: (502) 696-5300  
Fax: (502) 564-2698

*Attorneys for Plaintiff the Commonwealth of Kentucky*

COVINGTON & BURLING LLP

By: /s/ Ashley M. Simonsen  
Ashley M. Simonsen, SBN 275203  
COVINGTON & BURLING LLP  
1999 Avenue of the Stars  
Los Angeles, CA 90067  
Telephone: (424) 332-4800  
Facsimile: + 1 (424) 332-4749  
Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*  
Paul W. Schmidt, *pro hac vice*  
COVINGTON & BURLING LLP  
One City Center  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Telephone: + 1 (202) 662-6000  
Facsimile: + 1 (202) 662-6291  
Email: pajones@cov.com

*Attorney for Defendants Meta Platforms, Inc.  
f/k/a Facebook, Inc.; Facebook Holdings,  
LLC; Facebook Operations, LLC; Facebook  
Payments, Inc.; Facebook Technologies, LLC;  
Instagram, LLC; Siculus, Inc.; and Mark Elliot  
Zuckerberg*

FAEGRE DRINKER LLP

By: /s/ Andrea Roberts Pierson  
Andrea Roberts Pierson, *pro hac vice*  
FAEGRE DRINKER LLP  
300 N. Meridian Street, Suite 2500  
Indianapolis, IN 46204  
Telephone: + 1 (317) 237-0300  
Facsimile: + 1 (317) 237-1000  
Email: andrea.pierson@faegredrinker.com  
Email: amy.fiterman @faegredrinker.com

Amy R. Fiterman, *pro hac vice*  
FAEGRE DRINKER LLP  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
Telephone: +1 (612) 766-7768  
Facsimile: +1 (612) 766-1600

1 Email: amy.fiterman@faegredrinker.com

2 Geoffrey Drake, *pro hac vice*  
3 KING & SPALDING LLP  
4 1180 Peachtree Street, NE, Suite 1600  
5 Atlanta, GA 30309  
6 Tel.: 404-572-4600  
7 Email: gdrake@kslaw.com  
8 Email: dmattern@kslaw.com

9 David Mattern, *pro ha vice*  
10 KING & SPALDING LLP  
11 1700 Pennsylvania Avenue, NW, Suite 900  
12 Washington, D.C. 20006  
13 Telephone: +1 (202) 626-2946  
14 Email: dmattern@kslaw.com

15 *Attorneys for Defendants TikTok Inc. and ByteDance*  
16 *Inc.*

17 MUNGER, TOLLES & OLSEN LLP  
18 By: /s/ Jonathan H. Blavin  
19 Jonathan H. Blavin, SBN 230269  
20 MUNGER, TOLLES & OLSON LLP  
21 560 Mission Street, 27th Floor  
22 San Francisco, CA 94105-3089  
23 Telephone: (415) 512-4000  
24 Facsimile: (415) 512-4077  
25 Email: jonathan.blavin@mto.com

26 Rose L. Ehler (SBN 29652)  
27 Victoria A. Degtyareva (SBN 284199)  
28 Laura M. Lopez, (SBN 313450)  
Ariel T. Teshuva (SBN 324238)  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426  
Telephone: (213) 683-9100  
Facsimile: (213) 687-3702  
Email: rose.ehler@mto.com  
Email: victoria.degtyareva@mto.com  
Email: Ariel.Teshuva@mto.com

Lauren A. Bell (*pro hac vice forthcoming*)  
MUNGER, TOLLES & OLSON LLP  
601 Massachusetts Ave., NW St.,

1 Suite 500 E  
2 Washington, D.C. 20001-5369  
3 Telephone: (202) 220-1100  
4 Facsimile: (202) 220-2300  
5 Email: lauren.bell@mto.com

*Attorneys for Defendant Snap Inc.*

6 WILSON SONSINI GOODRICH & ROSATI  
7 Professional Corporation

By: /s/ Brian M. Willen

Brian M. Willen (*pro hac vice*)

8 WILSON SONSINI GOODRICH & ROSATI

1301 Avenue of the Americas, 40th Floor

9 New York, New York 10019

10 Telephone: (212) 999-5800

11 Facsimile: (212) 999-5899

Email: bwillen@wsgr.com

12 Lauren Gallo White (SBN 309075)

13 Samantha A. Machock (SBN 298852)

14 WILSON SONSINI GOODRICH & ROSATI

One Market Plaza, Spear Tower, Suite 3300

15 San Francisco, CA 94105

16 Telephone: (415) 947-2000

17 Facsimile: (415) 947-2099

Email: lwhite@wsgr.com

Email: smachock@wsgr.com

18 Christopher Chiou (SBN 233587)

19 Matthew K. Donohue (SBN 302144)

20 WILSON SONSINI GOODRICH & ROSATI

953 East Third Street, Suite 100

21 Los Angeles, CA 90013

22 Telephone: (323) 210-2900

23 Facsimile: (866) 974-7329

Email: cchiou@wsgr.com

Email: mdonohue@wsgr.com

*Attorneys for Defendants YouTube, LLC and Google  
24 LLC*

25 WILLIAMS & CONNOLLY LLP

By: /s/ Joseph G. Petrosinelli

26 Joseph G. Petrosinelli (*pro hac vice*)

27 jpetrosinelli@wc.com

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Ashley W. Hardin (*pro hac vice*)  
ahardin@wc.com  
680 Maine Avenue, SW  
Washington, DC 20024  
Telephone.: 202-434-5000  
Fax: 202-434-5029

*Attorneys for Defendants YouTube, LLC and Google LLC*

MORGAN, LEWIS & BOCKIUS LLP  
By: /s/ Yardena R. Zwang-Weissman  
Yardena R. Zwang-Weissman (SBN 247111)  
300 South Grand Avenue, 22nd Floor  
Los Angeles, CA 90071-3132  
Tel.: 213.612.7238  
Email: yardena.zwang-weissman@morganlewis.com

Brian Ercole (*pro hac vice*)  
600 Brickell Avenue, Suite 1600  
Miami, FL 33131-3075  
Tel.: 305.415.3416  
Email: brian.ercole@morganlewis.com

Stephanie Schuster (*pro hac vice*)  
1111 Pennsylvania Avenue NW  
NW Washington, DC 20004-2541  
Tel.: 202.373.6595  
Email: stephanie.schuster@morganlewis.com

*Attorneys for Defendants YouTube, LLC and Google LLC*

**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: April 12, 2024

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen