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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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

This Document Relates To:

ALL ACTIONS

MDL No. 3047

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

**JOINT STATUS REPORT ON RESULTS
OF MEET-AND-CONFER ON
ADDITIONAL AND UNANTICIPATED
DISCOVERY ON DISCLOSED
WITNESSES**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Case Management Order No. 27 (“CMO 27”), the Parties submit this joint status report
2 on the results of their meet-and-confers regarding additional and unanticipated discovery in connection
3 with witnesses disclosed on the Parties’ preliminary witness lists, exchanged September 24, 2025.

4 The Parties conferred about three categories of witnesses, outlined below. To the extent the
5 Parties have agreed to make certain of these witnesses available for further deposition, they will meet and
6 confer on a proposed timeline for completing those depositions and report back to the Court by the October
7 24, 2025 CMC.

8 **I. Additional and Unanticipated Discovery on New School District Witnesses**

9 Three of the school district bellwether Plaintiffs disclosed a total of eight new witnesses on their
10 preliminary witness lists exchanged September 24, 2025. In the course of conferrals, Plaintiffs withdrew
11 one of those witnesses. Consistent with a stipulation entered by the Parties in March 2025 (ECF 1752),
12 Plaintiffs have agreed to make each of the seven remaining new witnesses available for a 4.5-hour
13 deposition and to produce their custodial files.

14 Plaintiffs have informed Defendants that some or all of these seven witnesses (or other witnesses)
15 may submit declarations in support of Plaintiffs’ oppositions to Defendants’ motions for summary
16 judgment in the school district bellwether cases, due November 7, 2025. Depending on the number of
17 declarations ultimately submitted from school district witnesses and the content of those declarations, as
18 well as the timing of custodial file productions for those witnesses, Defendants may need, and expressly
19 reserve the right to request, additional time to prepare their replies in support of their motions for summary
20 judgment, currently due December 5, 2025, to allow time for depositions of those witnesses; and expressly
21 reserve the right to challenge Plaintiffs’ use of those declarations to the extent they present new facts after
22 the close of fact and expert discovery and the filing of motions for summary judgment. Plaintiffs intend
23 to oppose as improper and unnecessary any such request for a delay from Defendants, given that these
24 additional depositions were expressly contemplated by the Parties’ stipulation and the Court’s prior orders.
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II. Additional and Unanticipated Discovery on Defendant-Employee Witnesses Listed on Defendants' Preliminary Witness Lists

Defendants disclosed certain witnesses on their preliminary witness lists who were not previously deposed in the MDL in their individual capacities, but who were deposed as 30(b)(6) witnesses. To the extent Defendants can confirm that these witnesses would testify at trial only within the scope of the topics in the Rule 30(b)(6) notice, Plaintiffs have confirmed they will not seek to re-depose them. The Parties will meet and confer over whether the custodial files of these witnesses should be produced (if they were not already produced) and present any disputes in the forthcoming joint letter better.

A. Meta Witnesses

Meta included five Meta witnesses on its preliminary witness lists who were not previously deposed in the MDL in their individual capacities. Four of those witnesses were previously deposed in the MDL as 30(b)(6) witnesses, and the fifth was deposed in a Related Action pending against Meta in Utah as a corporate representative. Meta produced to Plaintiffs today transcripts of any depositions of these witnesses that were taken after the April 4, 2025 close of fact discovery in any Related Actions, including the JCCP and the fourteen attorney general actions pending against Meta in state courts. *See* ECF 2310 (ordering same). Meta has agreed to confirm, within approximately one week, whether it intends to present testimony from any of the first four witnesses at trial on topics beyond those for which they were designated to testify under Rule 30(b)(6). If such confirmation is provided, Plaintiffs have confirmed they will not seek to re-depose those witnesses. If such confirmation is not provided, Meta has agreed to make those witnesses available for a further deposition. As to the fifth witness (who was not previously deposed in the MDL in any capacity), Meta has agreed to make that witness available for a deposition and to run the Parties' agreed-upon MDL search terms over his Emails and Workplace Chats over the Relevant Time Period and produce responsive, not privileged documents. To the extent the Parties are unable to agree on the length of this or any other Meta witness's deposition, they will present such dispute to the Court in the joint letter brief due October 13.

B. TikTok Witnesses

The TikTok Defendants identified one witness on their preliminary witness list who was deposed as a Rule 30(b)(6) witness on school and school district-related topics. The TikTok Defendants have

1 confirmed that this witness would testify at trial only within the scope of the topics in the Rule 30(b)(6)
2 notice. PISD Plaintiffs do not seek an additional deposition of this witness. The Parties will meet and
3 confer regarding the production of the witness's custodial file and present any disputes in the forthcoming
4 joint letter brief.

5 **C. YouTube Witnesses**

6 YouTube identified one witness on its preliminary witness list who was deposed only as a Rule
7 30(b)(6) witness. YouTube has confirmed that this witness would testify at trial within the scope of the
8 30(b)(6) topics for which he was offered as a corporate representative at deposition. PISD Plaintiffs do
9 not seek an additional deposition of this witness. The Parties will meet and confer regarding the
10 production of the witness's custodial file and present any disputes in the forthcoming joint letter brief.

11 YouTube also identified one witness who is on its amended initial disclosures, and for whom
12 Plaintiffs previously moved the Court for a deposition. To the extent the Parties have a dispute as to the
13 PISD Plaintiffs' entitlement to a deposition of that witness, they will present that dispute in the
14 forthcoming joint letter brief.

15 **D. Snap Witness**

16 Snap identified one witness on its preliminary witness list who was deposed as a Rule 30(b)(6)
17 witness on school and school district-related topics. Snap has confirmed that this witness would testify at
18 trial only within the scope of the topics in the Rule 30(b)(6) notice. PISD Plaintiffs are not seeking further
19 discovery from this witness.

20 **III. Additional and Unanticipated Discovery on Former Meta Employee Witnesses Listed on**
21 **Plaintiffs' Preliminary Witness Lists**

22 PISD Plaintiffs listed two former Meta employee witnesses on their preliminary witness lists who
23 were not previously deposed in any capacity in the MDL: Sarah Wynn Williams and Jason Sattizahn. The
24 State AGs also listed Jason Sattizahn. Meta intends to move to strike these two witnesses from Plaintiffs'
25 witness lists, which Plaintiffs will oppose. The Parties will file a joint letter brief on this dispute by the
26 existing deadline of October 13. Meta reserves its right to seek depositions of these witnesses and further
27 documents if they are not stricken.
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IV. Meta Update on Document Productions

During the Parties' meet-and-confers on additional and unanticipated discovery, Plaintiffs and Meta also discussed ongoing privilege-downgrade productions from Meta since the April 4, 2025 close of fact discovery. During the fact discovery period, Meta produced approximately 2.4 million documents and withheld approximately 130,000 documents as privileged. Following the close of fact discovery, Meta undertook and has been continuing to undertake an extensive re-assessment of documents initially withheld as privileged. Meta notified Plaintiffs in July that it was undertaking this review and would be producing documents off the log on a rolling basis. Since that time, Meta has made rolling productions of approximately 23,000 documents (23% with privilege redactions) and expects to produce on the order of 60,000 or more additional documents before completing its privilege-downgrade productions around early November. Meta provided this estimate of additional anticipated downgrades to Plaintiffs on October 8 in response to an inquiry from Plaintiffs on October 7. Meta will continue to keep Plaintiffs updated on the status of these productions and is available to confer with Plaintiffs about any concerns.

Plaintiffs were not made aware of the scope of this issue until this filing. Plaintiffs reserve the rights to challenge the scope of the privilege downgrade and to seek additional discovery in light of these privilege downgrade productions.

1 Respectfully submitted,

2 DATED: October 8, 2025

By: /s/ Lexi J. Hazam

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I, Bailey J. Langner, 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: October 8, 2025

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