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FIRM INFORMATION
SOCIAL MEDIA VICTIMS LAW CENTER
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County of Los Angeles
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David W. Slayton,
Executive Officer/Clerk of Court,
By M. Arellanes, Deputy Clerk

Attorneys for Plaintiff
FIRM INFORMATION

Attorneys for Plaintiff
PLAINTIFF NAME
Kaley Glenn-Mills

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

**COORDINATION PROCEEDING
SPECIAL TITLE [RULE 3.400]**

SOCIAL MEDIA CASES

THIS DOCUMENT RELATES TO:

P.F., et al. v. Meta Platforms, Inc., et al.

Los Angeles Superior Court,

Case No. 23SMCV03371

Case No. for individual case, not Judicial Council
Coordination Proceeding No. Do not include spaces or
special characters (e.g., hyphens or dashes).

**JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 5255**

Lead Case No. For Filing Purposes:
22STCV21355

Judge: Hon. Carolyn B. Kuhl
SSC-12

**SECOND AMENDED SHORT FORM
COMPLAINT FOR DAMAGES AND
DEMAND FOR JURY TRIAL**

Action Filed: Jul 25 2023

Trial Date: None

1 The Plaintiff(s) named below file(s) this Short-Form Complaint and Demand for Jury
2 Trial against the Defendant(s) named/selected in Paragraph 3 herein by and through the
3 undersigned counsel. Plaintiff(s) incorporate(s) by reference the allegations and the relief sought
4 in Plaintiffs' Master Complaint (Personal Injury) ("Master Complaint"), filed in Social Media
5 Cases, JCCP 5255, in the Superior Court of the State of California, County of Los Angeles, as
6 they relate to such named Defendant(s) and adopts the Counts marked in Paragraph 6 of this
7 Short-Form Complaint. Plaintiff(s) file(s) this Short-Form Complaint.

8 As necessary, Plaintiff(s) may include (a) additional Counts and supporting
9 allegations against Defendants, as set forth in Paragraph 7 below in additional sheets attached
10 hereto and/or (b) additional claims and allegations against Other Defendants not listed in the
11 Master Complaint as set forth in Paragraph 7 below and may attach additional sheets hereto.

12 Plaintiff(s) indicate by checking boxes below the Parties and Counts specific to Plaintiff(s)'
13 case.

14
15 1. Plaintiff, [FIRST] _____ K.G.M. [MIDDLE] _____
16 [LAST] _____ (hereinafter "Plaintiff [LASTNAME]"
17 K.G.M. _____), is a citizen and resident of [COUNTY,
18 STATE] Butte County CA _____.

19 **IDENTIFICATION OF PARTIES**

20
21 **A. PLAINTIFF(S)**

22
23 2. Plaintiff [LASTNAME] _____ K.G.M. _____ brings this action:

24 On behalf of herself/himself/zirself.

25
26 As a representative/on behalf of, as a guardian ad litem, [FIRST] _____
27 [MIDDLE] _____ [LAST] _____ a minor.

28 ***SOCIAL MEDIA CASES, JCCP 5255 - SHORT FORM COMPLAINT***

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As the heir of Decedent [FIRST] _____ [MIDDLE] _____
[LAST] _____, or other person entitled to bring an
action for the wrongful death of Decedent [FIRST]
_____ [MIDDLE] _____ [LAST] _____,
who died on _____, and brings the Counts alleged in Section E
of this *Short-Form Complaint* pursuant to section 377.60 of the California
Code of Civil Procedure.

As the successor and/or representative in interest of Decedent
[FIRST] _____ [MIDDLE] _____ [LAST]
_____, and brings the Counts alleged in Section E of this Short-
Form Complaint, pursuant to section 377.30 of the California *Code of Civil Procedure*
(affidavit(s) or declaration(s) pursuant to section 377.32 were filed
concurrently with Plaintiff's initial complaint).

For loss of society or consortium and their relationship to the following individual of
which Plaintiff's claims are derivative [FIRST] _____ [MIDDLE]
_____ [LAST] _____, who sustained personal injuries
and damages as a result of a loss of her/his/zir use of Defendants' products.

Other: _____.

In the event any box is checked other than the first box, all references to Plaintiff in
Paragraphs 4 and 5 of this *Short-Form Complaint* refer to the minor-in-interest,
Decedent, primary injured party, or other party-in-interest, as may be applicable.

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B. DEFENDANT(S)

3. Plaintiff(s) name(s) the following Defendants in this action:

META

- META PLATFORMS, INC., *formerly known as Facebook, Inc.*
- INSTAGRAM, LLC
- FACEBOOK PAYMENTS, INC.
- SICULUS, INC.
- FACEBOOK OPERATIONS, LLC
- FACEBOOK TECHNOLOGIES, LLC
- FACEBOOK HOLDINGS, LLC

BYTEDANCE

- BYTEDANCE, LTD
- BYTEDANCE, INC.
- TIKTOK, LTD
- TIKTOK, LLC
- TIKTOK, INC.

ALPHABET

- GOOGLE, LLC
- YOUTUBE, LLC
- ALPHABET, INC.

SNAP

- SNAP, INC.

OTHER DEFENDANTS

For each “Other Defendant” identified herein, Plaintiff(s) contend(s) these additional parties are liable or responsible for Plaintiff(s) damages alleged herein. Plaintiff(s) herewith identify by name each Defendant and its citizenship. In doing so, Plaintiff(s) may attach additional pages to this *Short-Form Complaint*.

	OTHER DEFENDANT	CITIZENSHIP
1)		
2)		
3)		
4)		
5)		
6)		

Additional pages attached

1 **C. PRODUCT USE**

2 4. Plaintiff used the following Social Media Products that substantially contributed to
 3 Plaintiff's injury.

4 FACEBOOK

5 Approximate dates of use: _____ to _____

6 INSTAGRAM

7 Approximate dates of use: 00 00 2015 to 00 00 2025

8 SNAPCHAT

9 Approximate dates of use: 00 00 2017 to 00 00 2025

10 TIKTOK

11 Approximate dates of use: 00 00 2019 to 00 00 2025

12 YOUTUBE

13 Approximate dates of use: 00 00 2011 to 00 00 2025

14 OTHER:

Other Social Media Product(s) Used	Approximate Dates of Use
	to
	to
	to
	to
	to
	to
	to

Other Social Media Product(s) Used	Approximate Dates of Use
	to
	to

D. PHYSICAL INJURY

5. Plaintiff suffered personal injuries (including, in the case of a wrongful death plaintiff, wrongful death damages, and in the case of a loss of consortium plaintiff, loss of consortium damages) and emotional distress as a direct and proximate result of the use of the defective Social Media Products and the acts alleged. Plaintiff may specify the specific injuries below, but are not limited to the identified injuries. The fact that Plaintiff has not alleged a specific injury below does not mean and shall not be construed to mean that the Plaintiff has not suffered such an injury.

ADDICTION/COMPULSIVE USE

EATING DISORDER

Anorexia

Bulimia

Binge Eating

Other:

DEPRESSION

ANXIETY

SELF-HARM

Suicidality

Attempted Suicide

Death by Suicide

Other Self-Harm: Cutting

1 **OTHER PHYSICAL INJURIES (SPECIFY):**

2
3
4
5
6 _____
7 **EMOTIONAL OR PSYCHOLOGICAL INJURIES**

8
9 **OTHER PERSONAL INJURIES (SPECIFY):**

10 Body dysmorphia

11
12
13
14 _____
15
16 **E. COUNTS ASSERTED**

17 6. Plaintiff(s) allege the following marked Counts which are asserted in the *Master Complaint*
18 and the allegations with regard thereto are adopted in this *Short Form Complaint* by
19 reference:

Asserted Against ¹	Count Number	Count
<input checked="" type="checkbox"/> Meta entities <input checked="" type="checkbox"/> Snap entity <input checked="" type="checkbox"/> TikTok entities <input checked="" type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____ ²	1	STRICT LIABILITY - DESIGN DEFECT

26 ¹ For purposes of this paragraph, “entity” means those defendants identified in Paragraph 3 (e.g.,
27 “TikTok entities” means all TikTok defendants against which Plaintiff(s) is asserting claims).

28 ² Reference selected Other Defendants by the corresponding row number in the “Other Defendant(s)” chart above, in Paragraph 3.

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Asserted Against ¹	Count Number	Count
<input checked="" type="checkbox"/> Meta entities <input checked="" type="checkbox"/> Snap entity <input checked="" type="checkbox"/> TikTok entities <input checked="" type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____	2	STRICT LIABILITY - FAILURE TO WARN
<input checked="" type="checkbox"/> Meta entities <input checked="" type="checkbox"/> Snap entity <input checked="" type="checkbox"/> TikTok entities <input checked="" type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____	3	NEGLIGENCE - DESIGN
<input checked="" type="checkbox"/> Meta entities <input checked="" type="checkbox"/> Snap entity <input checked="" type="checkbox"/> TikTok entities <input checked="" type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____	4	NEGLIGENCE – FAILURE TO WARN
<input checked="" type="checkbox"/> Meta entities <input checked="" type="checkbox"/> Snap entity <input checked="" type="checkbox"/> TikTok entities <input checked="" type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____	5	NEGLIGENCE
<input checked="" type="checkbox"/> Meta entities <input checked="" type="checkbox"/> Snap entity <input checked="" type="checkbox"/> TikTok entities <input checked="" type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____	6	NEGLIGENT UNDERTAKING
<input type="checkbox"/> Meta entities <input type="checkbox"/> Other Defendant(s) ## _____	7	FRAUDULENT CONCEALMENT AND MISREPRESENTATION (Against Meta only)

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Asserted Against ¹	Count Number	Count
<input type="checkbox"/> Meta entities <input type="checkbox"/> Other Defendant(s) ## _____	8	NEGLIGENT CONCEALMENT AND MISREPRESENTATION (Against Meta only)
<input checked="" type="checkbox"/> Meta entities <input checked="" type="checkbox"/> Snap entity <input type="checkbox"/> TikTok entities <input checked="" type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____	9	NEGLIGENCE <i>PER SE</i>
<input checked="" type="checkbox"/> Meta entities <input checked="" type="checkbox"/> Snap entity <input checked="" type="checkbox"/> TikTok entities <input checked="" type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____	10	SEX AND AGE DISCRIMINATION
<input type="checkbox"/> Meta entities <input type="checkbox"/> Snap entity <input type="checkbox"/> TikTok entities <input type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____	11	WRONGFUL DEATH
<input type="checkbox"/> Meta entities <input type="checkbox"/> Snap entity <input type="checkbox"/> TikTok entities <input type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____	12	SURVIVAL ACTION
<input type="checkbox"/> Meta entities <input type="checkbox"/> Snap entity <input type="checkbox"/> TikTok entities <input type="checkbox"/> Google entities <input type="checkbox"/> Other Defendant(s) ## _____	13	LOSS OF CONSORTIUM AND SOCIETY

ADDITIONAL COUNTS

7. Plaintiff(s) assert(s) the following additional Counts and supporting allegations against the Defendant(s) designated in Paragraph 3 above:

NON-PRODUCT NEGLIGENT FAILURE TO WARN, see attachment

Count 14:

Count 15:

Count 16:

Count 17:

Count 18:

Count 19:

Count 20:

DEMAND FOR JURY TRIAL

Plaintiff(s) hereby demand(s) a trial by jury as to all claims in this action.

DATED: Apr 28 2025 FIRM NAME: Social Media Victims Law Center

By: /s/ Laura Marquez-Garrett
COUNSEL

Attorneys for Plaintiff(s)

SOCIAL MEDIA VICTIMS LAW CENTER
Laura Marquez-Garrett (SBN 221542)
600 1st Avenue, Suite 102-PMB 2383
Seattle, WA 98104
Ph: 206-741-4862

[PLAINTIFF(S) NAME(S)]

Plaintiff 1: [First] K.G.M. [Middle] _____ [Last] _____

Plaintiff 2: [First] _____ [Middle] _____ [Last] _____

Plaintiff 3: [First] _____ [Middle] _____ [Last] _____

Plaintiff 4: [First] _____ [Middle] _____ [Last] _____

Plaintiff 5: [First] _____ [Middle] _____ [Last] _____

SUPPLEMENTAL COUNT:

NEGLIGENCE – NON-PRODUCT FAILURE TO WARN

(Against All Defendants)

1. Plaintiff realleges and incorporates by reference the entirety of the current and active *Master Complaint* on file in this JCCP 5255 as though set forth fully herein. Specific references to non-exhaustive allegations of the *Master Complaint* that are particularly relevant to respective elements of this Count are also included below.

2. All Defendants, regardless of the existence of any “special relationship,” owed Plaintiff (and all JCCP Plaintiffs) a general duty of ordinary care.

3. Further, Defendants owed a heightened duty to Plaintiff – and all minor JCCP Plaintiffs – based on their knowledge that minors were using their platforms and/or their active targeting of conduct, marketing and advertising towards minors, as pled in the *Master Complaint*.

4. Concurrently and/or in the alternative, Defendants had a “special relationship” with the minor plaintiffs in this case, including Plaintiff here, because – among other reasons set forth in the *Master Complaint* and incorporated by reference herein – Defendants specifically targeted minors as a core market, designed platform features that appeal to minors and encouraged their use of Defendants’ apps, as pled throughout the *Master Complaint*. Defendants invited minors to use their platforms in order to earn advertising revenue and designed their platforms to enhance minors’ engagement, and thereby assumed a special relationship with Plaintiffs to not only protect against known risks but to exercise reasonable care to discover and warn of unknown hazards.

5. Defendants breached their duty to Plaintiff by failing to reasonably warn and instruct Plaintiff and her parents as to the risks associated with using their platforms, *see generally* MC at ¶¶ 19-20, 140 (All Defendants), by:

- a. Failing to adequately warn Plaintiff and her parents about the physical and mental health risks posed by Defendants’ platforms at any stage of Plaintiff’s interaction with the apps from pre-creation of an account forward; *see* MC at ¶¶ 269, 403-405

[Meta]; ¶¶ 514-516, 522 [Snap]; ¶¶ 652-653, 660, 665 [TikTok]; ¶¶ 803-805 [YouTube]; ¶¶ 861(a), 861(f) [All Defendants].

- b. Failing to adequately warn Plaintiff and her parents that Plaintiff exhibited problematic signs of addiction to and compulsive use of Defendants' platforms, such as warning that Plaintiff's screen time reached harmful levels or Plaintiff used the platform frequently or habitually; *see* MC at ¶ 406 [Meta]; ¶¶ 519, 522 [Snap]; ¶¶ 663, 665 [TikTok]; ¶ 807 [YouTube]; ¶ 861(e) [All Defendants].
- c. Failing to adequately warn Plaintiff and her parents that Plaintiff's data was tracked, used to help build a unique algorithmic profile, and sold to Defendants' advertising clients, who in turn used the data to target and profile Plaintiff; *see* MC at ¶ 404 [Meta]; ¶¶ 517, 522 [Snap]; 661, 665 [TikTok]; ¶¶ 710, 806 [YouTube]; ¶¶ 861(b), 861(c); 861(g) [All Defendants].
- d. Failing to adequately warn Plaintiff and her parents about which images have been altered or the mental health harms associated with the heavily filtered images; *see* MC at ¶ 407 [Meta]; ¶¶ 520, 522 [Snap]; ¶¶ 627-633 [TikTok]; ¶ 861(d) [All Defendants].
- e. Failing to adequately warn Plaintiff and her parents before it facilitated adult connections and interactions with Plaintiff that adult predators used their platforms to target you children for sexual exploitation, sextortion, and CSAM; *see* MC at ¶¶ 518, 522 [Snap], ¶¶ 662, 665 [TikTok]; ¶ 809 [YouTube]; ¶¶ 861(h), 861(i), 861(j), 861(k), 861(l) [All Defendants].
- f. Failing to provide any reasonable instruction to Plaintiff and her parents regarding safe youth use of the product at any stage of the user's interaction with the apps from pre-creation of an account forward; *see* MC at ¶ 408 [Meta], ¶ 518 [Snap]; ¶ 664 [TikTok]; ¶ 808 [YouTube].

6. Had Plaintiff received proper or adequate warnings or instructions as to the risks of using Defendants' respective apps, Plaintiff would have heeded the warnings and/or followed the

instructions and/or such warnings would have been effective in reducing, mitigating or eliminating the risks to Plaintiff.

7. Defendants' failure to adequately warn and instruct, as set forth herein, has proximately caused and/or was a substantial factor in causing significant harm to the mental and physical well-being of Plaintiff and all Plaintiffs in this case, in addition to the other injuries and harms claimed by Plaintiff.

8. Plaintiff was simultaneously injured by simultaneous use of Defendants' apps and/or simultaneous exposure to Defendants' harmful conduct through no fault of her own. These facts mean Defendants are jointly and severally liable for the injuries caused by any one of Defendants' apps or conduct and the burden shifts to Defendants to identify alternative causes of the alleged injuries and apportion responsibility for the alleged injuries.

9. The conduct of each Defendant, as described above, was intentional, fraudulent, willful, wanton, reckless, malicious, fraudulent, oppressive, extreme, and outrageous, and displayed an entire want of care and a conscious and depraved indifference to the consequences of its conduct, including to the health, safety, and welfare of their customers, including Plaintiff, and warrants an award of punitive damages in an amount sufficient to punish each Defendant and deter others from like conduct.

10. Plaintiff demands judgment against each Defendant for injunctive relief and for compensatory, treble, and punitive damages, together with interest, costs of suit, attorneys' fees, and all other such relief as the Court deems proper.