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11 [Additional counsel identified on signature page in accordance with Local Rule 3-4(a)(1)]

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN JOSE DIVISION**

15 **FEDERAL TRADE COMMISSION,**
16
17 Plaintiff,
18
19 v.
20 **META PLATFORMS, INC., et al.**
21
22 Defendants.

Case No. 5:22-cv-04325-EJD

**PLAINTIFF FEDERAL TRADE
COMMISSION'S MOTION TO REMOVE
INCORRECTLY FILED DOCUMENT:
DOCKET NOS. 275-2 & 277**

1 Plaintiff Federal Trade Commission respectfully files this Motion to remove from ECF its
2 Pre-Hearing Proposed Findings of Fact and Conclusions of Law (Dkt. Nos. 275-2 & 277), which
3 was submitted electronically on November 21, 2022. On November 22, 2022, counsel for
4 defendant Meta Platforms, Inc. (“Meta”) informed Plaintiff of its position that Paragraph 43(i) of
5 Dkt. 277 contains an unredacted reference to a matter that Meta deems highly confidential. Dkt.
6 275-2 is the version of this document that is provisionally sealed with highlights to indicate the
7 material that has been redacted from Dkt. 277.

8 Plaintiff promptly contacted the ECF helpdesk, which locked Dkt. Nos. 275-2 & 277
9 pending the Court’s adjudication of this Motion.

10 Plaintiff has filed an updated Administrative Motion to Consider Whether Another
11 Party’s Material Should be Sealed with reference to its Findings of Fact and Conclusions of Law
12 (Dkt. 287), which attaches an updated version of the Pre-Hearing Proposed Findings of Fact and
13 Conclusions of Law (with an additional highlight for the relevant material in that Paragraph
14 43(i)) and proposed order. Plaintiff will file a copy with the clerk’s office.

15 Plaintiff takes no position on the merits of this Motion.

16 Plaintiff respectfully requests that the Court grant its Motion to Remove Incorrectly Filed
17 Document: Docket Nos. 275-2 & 277.

18
19 Dated: November 22, 2022

Respectfully Submitted,

20 /s/ Abby L. Dennis
21 Abby L. Dennis
22 Peggy Bayer Femenella
23 Joshua Goodman
24 Jeanine Balbach
25 Michael Barnett
26 E. Eric Elmore
27 Justin Epner
28 Sean D. Hughto
Frances Anne Johnson
Andrew Lowdon
Erika Meyers
Lincoln Mayer
Susan A. Musser
Adam Pergament

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