



February 19, 2025

E-Filed

The Honorable Vince Chhabria
450 Golden Gate Avenue
17th Floor, Courtroom 4
San Francisco, CA 94102

Re: *Kadrey, et al v. Meta Platforms, Inc.*, Case No. 3:23-cv-03417-VC

Dear Judge Chhabria,

We write on behalf of Defendant Meta Platforms, Inc. (“Meta”), in light of Plaintiffs’ “Second Supplemental Letter re In Camera Review” (Dkt. 429), filed on February 13. As Meta explained in its last letter to the Court (Dkt. 424), filed February 12, Meta completed its review and production from the inadvertently sequestered documents, and, per the Court’s order (Dkt. 425), Meta will be prepared to discuss that issue at the February 27 hearing. Meta also stated in its February 12 letter that it “will meet and confer with Plaintiffs in preparation for the Court’s February 27, 2025 hearing,” Dkt. 424, and did so on February 13.

Thereafter, without conferring with Meta, Plaintiffs filed their Second Supplemental Letter, which makes various substantive arguments and requests. Meta is prepared to address the issues raised by Plaintiffs at the February 27 hearing or in a written submission if the Court so requests. However, in light of the Court’s order stating that the sequestered documents will be discussed at the February 27 hearing (Dkt. 425), and because the ongoing briefing is not contemplated by the Court’s rules or orders, Meta files this submission to state for the record its disagreement with Plaintiffs’ arguments and requests, and to inform the Court that it will respond to these arguments in whatever manner the Court would find useful.

Respectfully submitted,

/s/ Bobby Ghajar
/s/ Kathleen Hartnett
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