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12 *signature pages*

13 **UNITED STATES DISTRICT COURT**  
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
15 **OAKLAND DIVISION**

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

19 THIS FILING RELATES TO:

20 *People of the State of California, et al. v. Meta*  
21 *Platforms, Inc., et al., No. 4:23-cv-05448-YGR*

22 MDL No. 3047

23 Case No. 4:22-md-03047-YGR

24 Honorable Yvonne Gonzalez Rogers

25 **OMNIBUS STIPULATION REGARDING**  
26 **SEALING MATERIAL IN THE STATES'**  
27 **COMPLAINT**

Pursuant to Civil Local Rules 7-11 and 79-5 and this Court’s Order Setting Sealing Procedures (MDL Dkt. 341)<sup>1</sup>, Plaintiff States (the “States”) and Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., and Meta Platforms Technologies, LLC (collectively, “Meta”) submit this Omnibus Stipulation Regarding Sealing Material in the States’ Complaint.

Meta requests that the portions of the States’ Complaint (Dkt. 1) listed in the following table be maintained under seal and redacted in any publicly filed copy. The States, in the interest of avoiding a dispute on this limited issue before the Court in the current procedural posture, do not oppose the sealing and redaction of the below-listed portions of the Complaint at this time. These portions of the Complaint contain the names of certain current and former Meta employees. The States do not waive their ability, and reserve all rights, to challenge in the future the propriety of sealing these or other names in court filings.

The Parties agree that the portions of the Complaint not listed in the chart may be unsealed.<sup>2</sup>

Paragraph and Lines to Be Sealed	Basis for Sealing
¶ 115 (from after “Science” to before “reflected”)	The portions of the Complaint referenced in this chart are the names of current and former Meta employees. Meta contends that, at this procedural posture, there are compelling reasons to seal those names. <i>See, e.g., Murphy v. Kavo Am. Corp.</i> , 2012 WL 1497489, at *1 (N.D. Cal. Apr. 27, 2012) (granting motion to seal “employee-identifying information” because “[e]mployees and former employees who are not parties to this litigation have privacy interests in their personnel information, and in other sensitive identifying information”) (Gonzalez Rogers, J.); <i>see also, e.g., Am. Auto. Ass’n of N. California, Nevada &amp;</i>
¶ 229 (from after “including” to before “, current Director”)	
¶ 229 (from after “Science, and” to before “discussed”)	
¶ 229 (from after “girls.” to before “questioned”)	
¶ 236 (from after “employee” to before “noted”)	
¶ 372 (from after “at Meta” to before “suggested”)	
¶ 372 (from after “Management” to before “concluded”)	
¶ 380 (from after “researchers: ” to before “: ‘Turning’”)	
¶ 380 (from after “teens.” to before “: ‘Yeah’”)	
¶ 416 (from after “researcher” to before “sent”)	
¶ 449 (before “wrote to”)	
¶ 450 (before “, Research Director”)	
¶ 549 (from after “Manager” to before “noted”)	
¶ 549 (from after “share.” to before “further”)	
¶ 585 (from after “March 2020,” to before “noted”)	
¶ 587 (from after “In 2020,” to before “indicated”)	

<sup>1</sup> References to the docket in Case No. 4:23-cv-05448-YGR are denoted “Dkt.” References to the MDL docket, Case No. 4:22-md-03047-YGR, are denoted “MDL Dkt.”

<sup>2</sup> Meta does not waive, and expressly reserves, its right to move to seal other material from, or derived from, documents quoted, paraphrased, characterized, or otherwise cited in the Complaint. The confidentiality or appropriateness of sealing material other than that cited in the Complaint is not currently at issue, and Meta does not waive any right with respect to that material.

¶ 617 (from after “September 2020,” to before “, Director”	<i>Utah v. Gen. Motors LLC</i> , 2019 WL 1206748, at *2 (N.D. Cal. Mar. 14, 2019); <i>Opperman v. Path, Inc.</i> , 2017 WL 1036652, at *4 (N.D. Cal. Mar. 17, 2017); <i>Hunt v. Cont’l Cas. Co.</i> , 2015 WL 5355398, at *2 (N.D. Cal. Sept. 14, 2015). Sealing these names is also consistent with the approach this Court took in sealing names of Meta employees in the Personal Injury Plaintiffs’ Master Complaint. <i>See</i> MDL Dkt. 189.  The States do not oppose the sealing of these names in the Complaint at this time.
¶ 617 (from after “safe.” to before “further”)	
¶ 692 (from after “researcher” to before “noted”)	
¶ 717 (from after “Science” to before “, a Meta”)	
¶ 718 (from after “employee” to before “stated”)	
¶ 737 (from after “September 2021,” to before “instructed”)	
¶ 770 (from after “Engineer” to before “noted”)	
¶ 773 (from after “Mosseri and” to before “, then Facebook”)	
¶ 774 (from after “Instagram” to before “wrote”)	
¶ 774 (from after “2021,” to before “wrote”)	
¶ 775 (from after “year,” to before the next comma and from after that comma to before “and others”)	
¶ 778 (from after “2021,” to before “noted”)	
¶ 781 (from after “January 2021,” to before “discussed”)	
¶ 786 (from after “Researcher” to before “suggests”)	
¶ 817 (from after “employee” to before “reported”)	
¶ 824 (to before “stated”)	

Pursuant to this case’s sealing procedures, a Proposed Order implementing this stipulation and a copy of the States’ Complaint with the redactions agreed by the Parties listed above are attached.

**IT IS SO STIPULATED AND AGREED.**

DATED: November 22, 2023

Respectfully submitted,

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**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: November 22, 2023

By: /s/ Ashley M. Simonsen  
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