

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 1:20-cv-03590-JEB

**META PLATFORMS, INC.’S MOTION TO COMPEL
PRODUCTION OF 2012 AND 2014 FTC MEMORANDA**

Pursuant to Rule 37(a)(3)(B) of the Federal Rules of Civil Procedure, and for the reasons set forth in the accompanying memorandum of law, Defendant Meta Platforms, Inc. (“Meta”), by and through its undersigned counsel, hereby moves this Court for an order compelling Plaintiff Federal Trade Commission’s (“FTC”) production of eight memoranda from its 2012 investigation into Meta’s acquisition of Instagram, Inc. and its 2014 review of Meta’s acquisition of WhatsApp Inc.

Pursuant to Local Civil Rule 7(m), counsel for Meta and the FTC conferred regarding this Motion To Compel. The FTC opposes the Motion To Compel.

Meta respectfully requests oral argument on its motion pursuant to Local Civil Rule 7(f).

Dated: July 5, 2022

Respectfully submitted,

/s/ Mark C. Hansen

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