

# Exhibit B

**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

**PLAINTIFF'S PRELIMINARY WITNESS LIST**

Pursuant to the Court's December 20, 2024 Order (ECF No. 390), Plaintiff Federal Trade Commission provides the following preliminary witness list. Plaintiff reserves the right:

1. To modify or supplement any of the information below in the final witness list;
2. To call any other individuals not included on this preliminary witness list for the purpose of impeachment;
3. To call the custodian of records of any party or non-party or other witness to the extent necessary to demonstrate the authenticity or admissibility of documents, in the event a stipulation cannot be reached concerning the authentication or admissibility of such documents or an appropriate certification cannot be obtained pursuant to Federal Rule of Evidence 902(11);
4. To question the persons listed below about any topics that are the subjects of testimony by witnesses called by Defendant;
5. To question the persons listed below about any other topics that the person testified about at his or her deposition or investigational hearing, or about any matter that is discussed in

any document to which the person had access and which is designated as an exhibit by any party, or produced since the person's deposition was taken, or any other matters as to which it is determined that the person has knowledge that is relevant to the allegations of the Complaint or Defendant's defenses;

6. Not to call any of the persons listed, as circumstances may warrant;
7. To call any witness through video designation, rather than live, if needed, including to accommodate witnesses or address scheduling or availability constraints; and
8. To call any of these individuals or any other person for rebuttal testimony.

<b><u>Plaintiff's Case-in-Chief Witnesses Represented by Meta: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Alison, Tom Meta	Meta's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live
Cathcart, Will Meta	Meta's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live

<b><u>Plaintiff's Case-in-Chief Witnesses Represented by Meta: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Cobb, Curtiss Meta	Meta's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; the attributes, characteristics, and use of personal social networking services and other online services; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live
Hegeman, John Meta	Meta's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; competition in the personal social networking services market; the attributes, characteristics, and use of personal social networking services and other online services; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live

<b><u>Plaintiff's Case-in-Chief Witnesses Represented by Meta: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Mosseri, Adam Meta	Meta's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Meta's acquisition of WhatsApp; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live

<b><u>Plaintiff's Case-in-Chief Witnesses Represented by Meta: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Olivan, Javier Meta	Meta's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Meta's acquisition of WhatsApp; WhatsApp's operations and company practices, policies, and strategies prior to Meta's acquisition; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live
Rosen, Guy Meta	Meta's operations and company practices, policies, and strategies; the attributes, characteristics, and use of personal social networking services and other online services; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live

<b><u>Plaintiff's Case-in-Chief Witnesses Represented by Meta: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Sandberg, Sheryl Meta	Meta's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Meta's acquisition of WhatsApp; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live
Schroepfer, Mike Meta	Meta's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta's acquisition of Instagram; Meta's acquisition of WhatsApp; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live

<b><u>Plaintiff's Case-in-Chief Witnesses Represented by Meta: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Schultz, Alex Meta	Meta's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Meta's acquisition of WhatsApp; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live
Zuckerberg, Mark Meta	Meta's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Meta's acquisition of WhatsApp; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live

<b><u>Plaintiff's Case-in-Chief Witnesses Represented by Meta: May Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Cox, Chris Meta	Meta's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	May Call Live
Deng, Peter Meta	Meta's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Meta's acquisition of WhatsApp; WhatsApp's operations and company practices, policies, and strategies prior to Meta's acquisition; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	May Call Live

<b><u>Plaintiff's Case-in-Chief Witnesses Represented by Meta: May Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Ebersman, David Meta	Meta's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Meta's acquisition of WhatsApp; Instagram's operations and company practices, policies, and strategies prior to Meta's acquisition; WhatsApp's operations and company practices, policies, and strategies prior to Meta's acquisition; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	May Call Live
Patel, Keval Meta	Meta's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	May Call Live

<b><u>Plaintiff’s Case-in-Chief Witnesses Represented by Meta: May Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Simo, Fidji Meta	Meta’s operations and company practices, policies, and strategies; Meta’s provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta’s claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta’s defenses.	May Call Live <sup>1</sup>
Stoop, Dirk Meta	Meta’s operations and company practices, policies, and strategies; Meta’s acquisition of Instagram; Meta’s claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta’s defenses.	May Call Live

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<sup>1</sup> Meta has informed the FTC that it will file a motion seeking leave for Ms. Simo to testify remotely.

<b><u>Plaintiff's Other Case-in-Chief Witnesses: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
<p>Andreou, Jacob Snap</p> <p>Contact Information: John Karin, jkarin@wsgr.com</p>	<p>Snapchat's operations and company practices, policies, and strategies; Meta's and Snapchat's provision of personal social networking services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by Snapchat; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.</p>	<p>Will Call Live</p>
<p>Arora, Neeraj Meta Google</p> <p>Contact Information: Joseph Matelis, matelisj@sullcrom.com; Tracy Nelson Wirth, wirtht@sullcrom.com</p>	<p>Meta's acquisition of WhatsApp; WhatsApp's operations and company practices, policies, and strategies prior to Meta's acquisition; Google's operations and company practices, policies, and strategies; Google's interest in WhatsApp prior to Meta's acquisition; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.</p>	<p>Will Call Live</p>

<b><u>Plaintiff's Other Case-in-Chief Witnesses: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Botha, Roelof Sequoia Capital  Contact Information: Samer Musallam, Samer.musallam@ropesgray.com	Sequoia's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Instagram's operations and company practices, policies, and strategies prior to Meta's acquisition; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses	Will Call Live
Coleman, Keith Twitter/X  Contact Information: Peter Mucchetti, Peter.Mucchetti@cliffordchance.com	Twitter/X's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by Twitter/X; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live

<b><u>Plaintiff's Other Case-in-Chief Witnesses: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
DeWolfe, Chris MySpace  Contact Information: George Lindahl, gmorrislindahl@gmail.com	MySpace's operations and company practices, policies, and strategies; Meta's and MySpace's provision of personal social networking services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by MySpace; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live
Filner, Aaron Alphabet (YouTube)  Contact Information: Darren Tucker, darrentucker@velaw.com; Greg Wells, gregwells@velaw.com; Madison Lo, mlo@velaw.com	YouTube's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by YouTube; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live

<b><u>Plaintiff's Other Case-in-Chief Witnesses: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Goetz, Jim Sequoia Capital  Contact Information: Samer Musallam, Samer.musallam@ropesgray.com	Sequoia's operations and company practices, policies, and strategies; Meta's acquisition of WhatsApp; WhatsApp's operations and company practices, policies, and strategies prior to Meta's acquisition; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live
Horowitz, Bradley Alphabet  Contact Information: Darren Tucker, darrentucker@velaw.com; Greg Wells, gregwells@velaw.com; Madison Lo, mlo@velaw.com	Google's operations and company practices, policies, and strategies; Meta's and Google's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by Google; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live

<b><u>Plaintiff's Other Case-in-Chief Witnesses: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Jain, Saral Snap  Contact Information: John Karin, jkarin@wsgr.com	Snapchat's operations and company practices, policies, and strategies; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live
Morin, Dave Path  Contact Information: Robert Rieders, rhrlegaladvisory.com	Path's operations and company practices, policies, and strategies; Meta's and Path's provision of personal social networking services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by Path; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live

<b><u>Plaintiff's Other Case-in-Chief Witnesses: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Presser, Adam TikTok  Contact Information: Craig Reiser, creiser@axinn.com	TikTok's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by TikTok; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live
Roberts, Julia Pinterest  Contact Information: Peter Mucchetti, Peter.Mucchetti@cliffordchance.com	Pinterest's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by Pinterest; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live

<b><u>Plaintiff's Other Case-in-Chief Witnesses: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Shah, Ronak Apple  Contact Information: Evan Kreiner, Evan.kreiner@skadden.com	Apple's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Meta's acquisition of WhatsApp; Instagram's operations and company practices, policies, and strategies prior to Meta's acquisition; WhatsApp's operations and company practices, policies, and strategies prior to Meta's acquisition; Meta's provision of personal social networking services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by Apple; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live

<b><u>Plaintiff's Other Case-in-Chief Witnesses: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Systrom, Kevin Meta  Contact Information: Dave Wales, david.wales@skadden.com	Meta's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Instagram's operations and company practices, policies, and strategies prior to Meta's acquisition; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Live

<b><u>Plaintiff's Other Case-in-Chief Witnesses: May Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Ortega, Mateo Strava  Contact Information: Ann O'Brien, aobrien@sheppardmullin.com; Lindsey Collins, lcollins@sheppardmullin.com; John Carroll, jcarroll@sheppardmullin.com	Strava's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by Strava; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	May Call Live
Raymond, Winter Reddit  Contact Information: Ted Hassi, thassi@debevoise.com	Reddit's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by Reddit; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	May Call Live

<b><u>Plaintiff's Other Case-in-Chief Witnesses: May Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
<p>Tang, Julia Discord</p> <p>Contact Information: Krystal Durham, kdurham@wc.com; Adam Harber, aharber@wc.com</p>	<p>Discord's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by Discord; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.</p>	<p>May Call Live</p>
<p>Tucker, Eli Tumblr/Automattic</p> <p>Contact Information: Mindy Morton, Mindy.morton@Procopio.com</p>	<p>Tumblr's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by Tumblr; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.</p>	<p>May Call Live</p>

<b><u>Plaintiff's Other Case-in-Chief Witnesses: Will Call (Video)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Mehta, Rahul DST Global  Contact Information: Andy Lacy, alacy@goodwinlaw.com	Instagram's operations and company practices, policies, and strategies prior to Meta's acquisition; WhatsApp's operations and company practices, policies, and strategies prior to Meta's acquisition; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Video (witness resides out of country)
Pattabiraman, Kumaresh LinkedIn  Contact Information: Ryan Watts, Ryan.watts@arnoldporter.com	LinkedIn's operations and company practices, policies, and strategies; Meta's provision of personal social networking services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by LinkedIn; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	Will Call Video (witness resides out of country)

<b><u>Plaintiff's Expert Witnesses To Be Called During Plaintiff's Case-in-Chief and Rebuttal: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Aral, Sinan Expert	Meta's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Meta's acquisition of WhatsApp; Instagram's operations and company practices, policies, and strategies prior to Meta's acquisition; WhatsApp's operations and company practices, policies, and strategies prior to Meta's acquisition; the attributes, characteristics, and use of personal social networking services and other online services; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; the analyses described in Professor Aral's expert reports and the materials cited therein.	Will Call Live
Bray, Tim Expert	Meta's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Meta's acquisition of WhatsApp; Instagram's operations and company practices, policies, and strategies prior to Meta's acquisition; WhatsApp's operations and company practices, policies, and strategies prior to Meta's acquisition; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; the analyses described in Mr. Bray's expert reports and the materials cited therein.	Will Call Live

<b><u>Plaintiff's Expert Witnesses To Be Called During Plaintiff's Case-in-Chief and Rebuttal: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Hearle, Kevin Expert	Meta's operations and company practices, policies, and strategies; Meta's acquisition of WhatsApp; Instagram's operations and company practices, policies, and strategies prior to Meta's acquisition; WhatsApp's operations and company practices, policies, and strategies prior to Meta's acquisition; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; the analyses described in Mr. Hearle's expert reports and the materials cited therein.	Will Call Live

<b><u>Plaintiff's Expert Witnesses To Be Called During Plaintiff's Case-in-Chief and Rebuttal: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Hemphill, Scott Expert	Meta's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Meta's acquisition of WhatsApp; Instagram's operations and company practices, policies, and strategies prior to Meta's acquisition; WhatsApp's operations and company practices, policies, and strategies prior to Meta's acquisition; Meta's and others' provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by other apps; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; the analyses described in Professor Hemphill's expert reports and the materials cited therein.	Will Call Live

<b><u>Plaintiff's Expert Witnesses To Be Called During Plaintiff's Case-in-Chief and Rebuttal: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Lampe, Cliff Expert	Meta's operations and company practices, policies, and strategies; Meta's and others' provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by other apps; barriers to entry and expansion in the personal social networking services market; the analyses described in Professor Lampe's expert reports and the materials cited therein.	Will Call Live
Malkiewicz, Michal Expert	Meta's operations and company practices, policies, and strategies; Meta's and others' provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; the attributes, characteristics, use of, and competitive conditions faced by, Meta and other online services; the analyses described in Mr. Malkiewicz's expert reports and the materials cited therein.	Will Call Live

<b><u>Plaintiff's Expert Witnesses To Be Called During Plaintiff's Case-in-Chief and Rebuttal: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
McCoy, Damon Expert	Meta's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Meta's acquisition of WhatsApp; Instagram's operations and company practices, policies, and strategies prior to Meta's acquisition; WhatsApp's operations and company practices, policies, and strategies prior to Meta's acquisition; the attributes, characteristics, use of, and competitive conditions faced by Meta and other online services; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; the analyses described in Professor McCoy's expert reports and the materials cited therein.	Will Call Live

<b><u>Plaintiff's Expert Witnesses To Be Called During Plaintiff's Case-in-Chief and Rebuttal: Will Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Rim, Jihoon Expert	Meta's acquisition of WhatsApp; Instagram's operations and company practices, policies, and strategies prior to Meta's acquisition; WhatsApp's operations and company practices, policies, and strategies prior to Meta's acquisition; Meta's and others' provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; the attributes, characteristics, use of, and competitive conditions faced by mobile messaging apps; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; the analyses described in Mr. Rim's expert report and the materials cited therein.	Will Call Live

<b><u>Witnesses That Plaintiff Presently Anticipates it May Call in Rebuttal: May Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Acton, Brian Meta  Contact Information: Joseph Matelis, matelisj@sullcrom.com; Tracy Nelson Wirth, wirtht@sullcrom.com	Meta’s operations and company practices, policies, and strategies; Meta’s acquisition of WhatsApp; WhatsApp’s operations and company practices, policies, and strategies prior to Meta’s acquisition; the attributes, characteristics, use of, and competitive conditions faced by WhatsApp; Meta’s provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta’s claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta’s defenses.	May Call Live

<b><u>Witnesses That Plaintiff Presently Anticipates it May Call in Rebuttal: May Call (Live)</u></b>		
<b>Witness Name Current/Former Employer Contact Information</b>	<b>Brief Description of Testimony</b>	<b>Will Call or May Call Form of Testimony</b>
Krieger, Mike Meta  Contact Information: Dave Wales, david.wales@skadden.com	Meta's operations and company practices, policies, and strategies; Meta's acquisition of Instagram; Instagram's operations and company practices, policies, and strategies prior to Meta's acquisition; the attributes, characteristics, use of, and competitive conditions faced by Instagram; Meta's provision of personal social networking services; the attributes, characteristics, and use of personal social networking services and other online services; competition in the personal social networking services market; barriers to entry and expansion in the personal social networking services market; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	May Call Live
Vallery, Jason Microsoft  Contact Information: Amy Ray, amyray@orrick.com	Microsoft Azure's operations and company practices, policies, and strategies; Meta's claimed procompetitive justifications relating to its acquisitions of Instagram and/or WhatsApp; any other matters as to which it is determined that the witness has knowledge that is relevant to the allegations in the complaint or Meta's defenses.	May Call Live

Dated: January 27, 2025

Respectfully submitted,

/s/ Daniel Matheson

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