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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC., a Delaware corporation,

Defendant.

Case No. 3:23-cv-03417-VC-TSH

DEFENDANT META PLATFORMS, INC.'S RESPONSE TO PLAINTIFFS' ADMINISTRATIVE MOTION FOR LEAVE RE: ROLLER DEPOSITION

Meta does not object to the *Kadrey* Plaintiffs' cross-noticing and participating in the deposition of Mr. Stephen Roller sought via the subpoena served by Chicken Soup for the Soul, LLC ("Chicken Soup") (Ex. A), in the event a deposition pursuant to Chicken Soup's subpoena goes forward. While Meta does not object to Chicken Soup seeking Mr. Roller's deposition as one of the twenty depositions that Entrepreneur and the three "C" Plaintiffs are permitted to seek in the related matters, Meta is not yet taking a position on any objections that Mr. Roller, a former employee who is represented by his own separate counsel, may have to Chicken Soup's subpoenas or to another deposition by the *Kadrey* Plaintiffs, or to the parameters of any such deposition (including privilege, scope, timing, and length).

Dated: August 3, 2026

By: */s/ Phillip E. Morton*
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