[Counsel Listed on Signature Page]

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

JOINT DISCOVERY STATUS REPORT

The parties respectfully submit this joint discovery status report to update the Court on the status of the parties' disputes concerning Meta's privilege assertions.

As indicated in their August 4 and August 18 Status Reports, the parties have met and conferred regarding a number of Meta's privilege and work product claims in privilege logs served in connection with Meta's productions that were the subject of additional permitted discovery in the *Kadrey* matter.

Given the number of documents in dispute, the parties requested in their August 4 Status Report that the Court permit an enlargement of the page limit to 10 pages. The Court granted the request. *See* Dkt. 799. The parties had at that time agreed on a briefing schedule whereby the joint letter brief would be filed by August 19. *See* Dkt. 794 at 1.

Following the August 5 Discovery Status Conference, the parties further narrowed the scope of their disputes, which necessitated further time for briefing than contemplated in the August 4 Status Report (Dkt. 794). Plaintiffs served their portion of a joint letter brief on Meta on August 14.

On September 1, Meta emailed Plaintiffs with an agreement to downgrade or narrow its privilege assertions with respect to 32 of the 54 challenged documents. Meta expects to produce those downgraded documents within the next week. If any disputes remain for those documents, the parties will meet and confer.

Plaintiffs proceeded to brief a subset of the challenged documents identified in Plaintiffs' August 14 joint letter brief, specifically redacted content from the AIDC over which Meta informed Plaintiffs it would not withdraw or revise its claims of privilege. Plaintiffs sent Meta their two-page portion of the brief on Tuesday, September 16. Plaintiffs requested that Meta respond by close of business on Thursday, September 18, so Plaintiffs could file on Friday, September 19. Meta said it needed more time for its response and would respond by next Friday, September 25. Plaintiffs do not oppose Meta's request. The parties expect to file the joint letter brief on September 28.

Plaintiffs' request in the parties' September 1 Discovery Status Report (Dkt. 823) concerning Meta's 30(b)(6) objections and additional deposition time remains at issue. The parties

can submit a joint letter brief if that would be helpful to the Court.

Dated: September 21, 2026

By: */s/ Phillip E. Morton*

Respectfully submitted,

By: */s/ Maxwell V. Pritt*

DUNN ISAACSON RHEE LLP
Karen L. Dunn (pro hac vice)
Jessica E. Phillips (pro hac vice)
Kyle N. Smith (pro hac vice)
401 9th Street NW Washington, DC
20004 Telephone: (202) 240-2900
Email: kdunn@dirllp.com
jphillips@dirllp.com
ksmith@dirllp.com

COOLEY LLP
Bobby A. Ghajar (198719)
1333 2nd Street, Suite 400
Santa Monica, CA 90401
Telephone: (310) 883-6400
Facsimile: (310) 883-6500
Email: bghajar@cooley.com
cghazarian@cooley.com

Mark R. Weinstein (193043)
Elizabeth Lee Stameshkin (260865)
3175 Hanover Street
Palo Alto, CA 94304
Telephone: 650-843-5000
Facsimile: 650-849-7400
Email: mweinstein@cooley.com
lstameshkin@cooley.com

Kathleen R. Hartnett (314267)
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Telephone: (415) 693-2071
Facsimile: (415) 693-2222
Email: khartnett@cooley.com

BOIES SCHILLER FLEXNER LLP
David Boies (*pro hac vice*)
333 Main Street
Armonk, NY 10504
(914) 749-8200
dboies@bsfllp.com

Maxwell V. Pritt (SBN 253155)
Joshua M. Stein (SBN 298856)
Margaux Poueymirou (SBN 356000)
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
(415) 293-6800
mpritt@bsfllp.com
jstein@bsfllp.com
mpoueymirou@bsfllp.com

Jesse Panuccio (*pro hac vice*)
1401 New York Ave, NW
Washington, DC 20005
(202) 237-2727
jpanuccio@bsfllp.com

David L. Simons (*pro hac vice*)
55 Hudson Yards, 20th Floor
New York, NY 10001
(914) 749-8200
dsimons@bsfllp.com

Interim Lead Counsel for Individual and Representative Plaintiffs and the Proposed Class

Phillip E. Morton (pro hac vice)
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004-2400
Telephone: (202) 728-7055
pmorton@cooley.com

CLEARY GOTTLIEB STEEN & HAMILTON LLP
Angela Dunning
1841 Page Mill Road, Suite 250
Palo Alto, CA 94304-1248
Telephone: (650) 815-4131
Email: adunning@cgsh.com

Attorneys for Defendant
META PLATFORMS, INC.

ECF ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Meta concurs in the filing of this document.

/s/ *Maxwell V. Pritt*