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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

DECLARATION OF KYANNA SABANOGLU ISO META PLATFORMS, INC.'S ADMINISTRATIVE MOTION TO SEAL SUPPORTING EVIDENCE SUBMITTED WITH THE JOINT LETTER BRIEF RE PRIVILEGE

I, Kyanna Sabanoglu, hereby declare:

1. I am an Associate General Counsel, IP Litigation for Defendant Meta Platforms, Inc. ("Meta"). I provide this Declaration based on my personal knowledge and/or after a reasonable investigation of the relevant facts. If called to testify as a witness, I could and would testify competently thereto.

2. Pursuant to Civil L.R. 79-5(f)(3), I make this Declaration in support of Meta's Administrative Motion to File Under Supporting Evidence Submitted with the Joint Letter Brief Re Privilege.

3. Meta requests the Court's permission to file under seal narrowly tailored portions of certain exhibits accompanying the Joint Letter Brief Re Privilege, as set forth in the chart below alongside the relief requested for each:

Document	Sealing Request
Sabanoglu Ex. A – Exhibit 1 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. B – Exhibit 3 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. C – Exhibit 4 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. D – Exhibit 5 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. E – Exhibit 6 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. F – Exhibit 7 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. G – Exhibit 8 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. H – Exhibit 9 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. I – Exhibit 10 to the Joint Letter Brief	Redacted Highlighted Portions

Sabanoglu Ex. J – Exhibit 11 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. K – Exhibit 12 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. L – Exhibit 13 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. M – Exhibit 14 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. N – Exhibit 15 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. O – Exhibit 17 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. P – Exhibit 19 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. Q – Exhibit 20 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. R – Exhibit 21 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. S – Exhibit 22 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. T – Exhibit A to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. U – Exhibit 25 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. V – Exhibit 28 to the Joint Letter Brief	Redacted Highlighted Portions
Sabanoglu Ex. W – Exhibit 29 to the Joint Letter Brief	Redacted Highlighted Portions

4. Meta seeks the Court's permission to file under seal discrete portions of the following exhibits, as further explained below.

5. **Meta Employee PII**. Meta respectfully requests the Court's permission to redact limited portions of **Sabanoglu Exhibits A-M, O, P, Q, S-W** that reflect employees' personal

identifiable information (PII)—namely, email addresses for Meta's individual employees, who are not parties to the case. Such information has been redacted to protect employee privacy and to avoid the risk of third parties' unauthorized and/or illicit use of the information, such as for automated or unwanted solicitation or contact. Meta has previously requested to seal documents based on the same personal identifiable information, (*e.g.,* Dkt. 391-1 ¶ 5; Dkt. 409-1 ¶¶ 3, 7–8, 10), which this Court has granted, (*e.g.,* Dkt. 393; Dkt. 414).

6. Meta's Cybersecurity Information. Meta respectfully requests the Court's permission to redact limited portions of **Sabanoglu Exhibits A, B, C, E, F, H, J, L, N, S-W** that reflect hyperlinks, file paths, and certain file names (*e.g.*, links to access Meta's internally stored documents and data), which point to Meta's confidential and proprietary information and sensitive features of its internal systems. These materials are maintained with restricted access in the ordinary course of Meta's business and are not generally known to the public or Meta's competitors. Disclosure of this confidential and proprietary information about Meta's infrastructure may increase the risk of cybersecurity threats or breaches as third parties may seek to gain access to and use the information to compromise and intrude upon Meta's internal systems and other confidential information. Accordingly, hyperlinks, file paths, and file names have been sufficiently redacted to mitigate these risks. Meta previously requested to seal documents based on the same concerns regarding network security, (*e.g.,* Dkt. 391-1 ¶ 9), which this Court has granted, (*e.g.,* Dkt. 393).

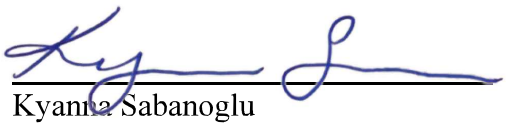
7. Meta's Highly Confidential Technical Information. Meta respectfully requests the Court's permission to redact limited portions of **Sabanoglu Exhibits B, D, I, N, R, U, and W** that reflect Meta's technical information, including nonpublic source code. Meta treats its technical information and source code with a high degree of security, and public disclosure of its technical information and source code would expose Meta to competitive harm. Accordingly, maintaining the confidentiality of technical information and source code is critical to Meta's business and Meta treats this information as highly confidential. Meta has previously requested to seal documents based on similar technical information, and trade secret information pertaining to its generative AI offerings, (e.g., Dkt. 266-1 ¶ 6), which this Court has granted, (e.g., Dkt. 317 (granting Dkt. 266)).

8. Meta's Third-Party Relationship Information. Meta respectfully requests the

Court's permission to redact limited portions of **Sabanoglu Exhibits E, N, and W** that reflect confidential the identity of third-parties (who are not parties to this lawsuit), where Meta has entered into and are subject to confidentiality and non-disclosure obligations and agreements, where these third-parties obtained promises of confidentiality from Meta. Disclosure of such information would put the third party's confidential information at risk. To the extent the Court believes the identity of these third-parties should be made public, Meta requests that the Court allow these third parties an opportunity to put in their own declaration justifying confidentiality. Meta has previously requested to seal documents based on similar third-party information, (e.g., Dkt. 391-1, ¶ 6; Dkt. 409-1, ¶ 12), which this Court has granted, (e.g., Dkt. 393 (granting Dkt. 391); Dkt. 414 (granting Dkt. 409).)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in New York, New York on this 3rd day of November 2026.



Kyanna Sabanoglu