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Attorneys for Defendant
META PLATFORMS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

STRIKE 3 HOLDINGS, LLC, a Delaware
limited liability company, and COUNTERLIFE
MEDIA, LLC, a Delaware limited liability
company,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
corporation,

Defendant.

Case No. 5:25-cv-06213-EKL

**DECLARATION OF ANGELA DUNNING IN
SUPPORT OF DEFENDANT META PLATFORMS,
INC.'S MOTION TO DISMISS PLAINTIFFS'
COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

Date: January 21, 2026

Time: 10:00 a.m.

Ctrm: 7

Judge: Hon. Eumi K. Lee

1 I, Angela L. Dunning, declare as follows:

2 1. I am a partner of the law firm Cleary Gottlieb Steen & Hamilton LLP, counsel to
3 Meta Platforms, Inc., Defendant in this case. I make this declaration in support of Defendant's
4 Motion to Dismiss Plaintiffs' Complaint for Copyright Infringement (the "Motion") and the
5 accompanying Request for Consideration of Documents Incorporated by Reference and Subject to
6 Judicial Notice.

7 2. Attached as **Exhibit 1** is a true and correct copy of Meta Platform, Inc.'s (formerly
8 Facebook, Inc.) Annual Form 10-K filed with the Securities and Exchange Commission for the
9 fiscal year ended December 31, 2018. The submission itself is available on SEC's public EDGAR
10 database at: [https://www.sec.gov/Archives/edgar/data/0001326801/000132680119000009/00013](https://www.sec.gov/Archives/edgar/data/0001326801/000132680119000009/0001326801-19-000009-index.html)
11 [26801-19-000009-index.html](https://www.sec.gov/Archives/edgar/data/0001326801/000132680119000009/0001326801-19-000009-index.html).

12 3. Attached as **Exhibit 2** is a true and correct copy of Meta Platform, Inc.'s Annual
13 Form 10-K filed with the Securities and Exchange Commission for the fiscal year ended December
14 31, 2024. The submission itself is available on SEC's public EDGAR database at:
15 [https://www.sec.gov/Archives/edgar/data/0001326801/000132680125000017/0001326801-25-](https://www.sec.gov/Archives/edgar/data/0001326801/000132680125000017/0001326801-25-000017-index.html)
16 [000017-index.html](https://www.sec.gov/Archives/edgar/data/0001326801/000132680125000017/0001326801-25-000017-index.html).

17 4. Attached as **Exhibit 3** is a true and correct copy of the research paper titled "Ego4D:
18 Around the World in 3,000 Hours of Egocentric Video," published by Meta AI Research (formerly
19 Facebook AI Research) and academic collaborators on March 11, 2022, publicly available at
20 <https://arxiv.org/abs/2110.07058>.

21 5. Attached as **Exhibit 4** is a true and correct copy of Meta AI's Terms of Service, last
22 updated July 1, 2025 and publicly available at <https://www.facebook.com/legal/ai-terms>.

23 6. Attached as **Exhibit 5** is a true and correct copy of a spreadsheet reflecting the
24 information in Plaintiffs' Exhibit F to the Complaint, sorted chronologically rather than by Work.

25 7. Attached as **Exhibit 6** is a true and correct copy of a document produced by Meta
26 with the first Bates Number Meta_Kadrey_00128310, originally filed under seal as Ex. 88 to
27 Plaintiffs' Notice of Motion and Motion for Partial Summary Judgment, *Kadrey et al. v. Meta*
28 *Platforms, Inc.*, Case No. 3:23-cv-03417-VC (N.D. Cal. Mar. 10, 2025) (Dkt. No. 472-91)

1 (hereinafter, “*Kadrey*”). The exhibited copy was later filed with the Declaration of Michelle
2 Woodhouse ISO Plaintiffs’ Administrative Motions to Consider Whether Another Party’s Material
3 Should be Sealed, *Kadrey* (N.D. Cal. Apr. 25, 2025) (Dkt. No. 568-9).

4 8. Attached as **Exhibit 7** is a true and correct copy of excerpts from the transcript of
5 the Rule 30(b)(6) deposition of Meta, by and through its corporate designee, Michael Clark, taken
6 December 19, 2024. The exhibited copy was originally filed in support of the Declaration of Bobby
7 Ghajar in Support of Defendant Meta Platforms, Inc.’s: (1) Notice of Motion and Motion for Partial
8 Summary Judgment; and (2) Opposition to Plaintiffs’ Motion for Partial Summary Judgment,
9 *Kadrey* (N.D. Cal. March 24, 2025) (Dkt No. 490-37).

10 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
11 27th day of October, 2025, in Palo Alto, California.

12
13 CLEARY GOTTlieb STEEN & HAMILTON LLP

14
15 /s/ Angela L. Dunning

16 Angela L. Dunning

17 Attorneys for Defendant
18 META PLATFORMS, INC.