

EXHIBIT A

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

CHICKEN SOUP FOR THE SOUL, LLC,

 Plaintiff,

 v.

 META PLATFORMS, INC.,

 Defendant.

Case No. 3:26-cv-02333-VC

**DEFENDANT META PLATFORMS, INC.'S
 RESPONSES AND OBJECTIONS TO
 PLAINTIFF'S FIRST SET OF
 INTERROGATORIES**

Judge: Hon. Vince Chhabria

1 **PROPOUNDING PARTY: PLAINTIFF CHICKEN SOUP FOR THE SOUL, LLC**

2 **RESPONDING PARTY: DEFENDANT META PLATFORMS, INC.**

3 **SET NUMBER: ONE**

4 Pursuant to Federal Rules of Civil Procedure 26 and 33, and Local Rule 33 of the United
5 States District Court for the Northern District of California, Defendant Meta Platforms, Inc.
6 (“Meta”) hereby objects and responds as follows to Plaintiff Chicken Soup For The Soul, LLC’s
7 (“Plaintiff”) First Set of Interrogatories (“Interrogatories”).

8 **I. Responses to All Interrogatories**

9 1. Meta’s responses to these Interrogatories are made to the best of Meta’s present
10 knowledge, information, and belief. Said responses are at all times subject to such additional or
11 different information that discovery or further investigation may disclose, and while based on the
12 present state of Meta’s recollection, are subject to such refreshing of recollection, and such
13 additional knowledge of facts, as may result from Meta’s further discovery or investigation. Meta
14 reserves the right to make any use of, or to introduce at any hearing and at trial, information and/or
15 documents responsive to these Interrogatories but discovered subsequent to the date of these
16 responses, including, but not limited to, any such information or documents obtained in discovery
17 herein.

18 2. To the extent that Meta responds to an Interrogatory by stating that Meta will
19 provide information or documents that Meta deems to embody material that is private, business
20 confidential, proprietary, trade secret, or otherwise protected from disclosure pursuant to Federal
21 Rule of Civil Procedure 26(c) and/or Federal Rule of Evidence 501, Meta will only do so subject
22 to the Protective Order (Dkt. 61) governing the unauthorized use or disclosure of such information
23 or documents with a designated “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL -
24 ATTORNEYS’ EYES ONLY” or “HIGHLY CONFIDENTIAL – SOURCE CODE” distinction.

25 3. Meta reserves all objections or other questions as to the competency, relevance,
26 materiality, privilege or admissibility as evidence in any subsequent proceeding in or trial of this
27 or any other action for any purpose whatsoever of Meta’s responses herein and any document or
28 thing identified or provided in response to the Interrogatories.

II. Objections to Instructions and Definitions

Whether or not separately set forth in response to each Interrogatory, Meta makes these objections to the following Instructions and Definitions.

1. Meta objects to the definition of “COPYRIGHT MANAGEMENT INFORMATION” to the extent it calls for a legal conclusion. Specifically, a determination of whether any particular data, text, or metadata constitutes “Copyright Management Information” under 17 U.S.C. § 1202(c) is inherently legal in nature and calls for a legal conclusion. Meta is not in a position to know whether any particular information qualifies as legally protected Copyright Management Information and a determination of such is not within Meta’s possession, custody, or control. Meta further objects to this definition as vague and ambiguous, overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent it includes identifying information for persons that “created” copyrighted works.

2. Meta objects to the definition of “CHICKEN SOUP FOR THE SOUL WORK(S)” as overbroad, unduly burdensome and disproportionate to the needs of the case to the extent it puts the burden on Meta to determine which works purportedly “belong” to CHICKEN SOUP FOR THE SOUL. Meta further objects to the term “belong” as vague and ambiguous as it is unclear what form of possession or ownership is intended by the use of this term. Without agreeing that CHICKEN SOUP FOR THE SOUL possesses or owns any valid copyright in any specific works, Meta will interpret the term CHICKEN SOUP FOR THE SOUL WORKS to refer to the specific works identified in Exhibit A to the Interrogatories.

3. Meta objects to the definitions of “COMMUNICATIONS” and “DOCUMENT(S)” to the extent these definitions are inconsistent with and otherwise seek to circumvent the custodian and search term limits for electronic communications (including emails and other electronic correspondence, and documents attached thereto), as provided in the forthcoming ESI Order.

4. Meta further objects to the definitions of “COMMUNICATIONS” and “DOCUMENT(S)” to the extent they seek to expand or alter the scope of the Federal Rules of Civil Procedure, the Local Rules of this Court, or the forthcoming ESI Order. Meta further objects to these definitions to the extent they seek Meta to produce documents that are not reasonably

1 accessible because of undue burden or cost pursuant to Fed. R. Civ. P. 26(b)(2)(B), which are
2 unduly burdensome to preserve and search, or which otherwise, under the proportionality factors,
3 should not be preserved.

4 **5.** Meta objects to the definitions of “CORPORA” and “DATASET(S)” as overbroad,
5 unduly burdensome, and disproportionate to the needs of the case, including (but not limited to) the
6 extent they refer to non-textual materials that are not relevant to any party’s claims or defenses and
7 to the extent they refer vaguely to “other content.” Without any admission with respect to content
8 or nature, Meta will construe the term “DATASET(S)” to refer to Anna’s Archive, Bibliotik,
9 Books3, C4, Library Genesis (or LibGen), Sci-Hub, The Pile, and Z-Library.

10 **6.** Meta objects to the definition of “INFRINGE,” “INFRINGED,” and “INFRINGES”
11 to the extent it calls for a legal conclusion. Specifically, a determination of whether any conduct
12 constitutes copyright infringement is inherently legal in nature and calls for a legal conclusion.
13 Meta is not in a position to know whether any particular conduct infringes on a legally protected
14 work and a determination of such is not within Meta’s possession, custody, or control.

15 **7.** Meta objects to the definition of “LARGE LANGUAGE MODEL(S)” and “LLM
16 MODEL(S)” as vague and ambiguous, overbroad, unduly burdensome, and disproportionate to the
17 needs of the case. In particular, the phrase “any machine learning model, neural network,
18 generative artificial intelligence model, transformer model, or similar computational system trained
19 on large quantities of text or other data” is overly broad and encompasses tools and services that
20 are not relevant to any party’s claims or defenses. Meta further objects to this definition to the
21 extent that it purports to require Meta to produce documents or information concerning large
22 language models that were not publicly released and/or were not trained on corpuses of text that
23 allegedly include any of Plaintiff’s allegedly copyrighted works. Meta further objects that the
24 phrase “process, predict, generate, summarize, classify, or otherwise manipulate natural language
25 or content” renders the definition vague, ambiguous, confusing, and overly broad. Meta will
26 construe “LARGE LANGUAGE MODEL(S)” and “LLM MODEL(S)” to mean the publicly
27 released Llama 1, Llama 2, Llama 3, Llama 4, and Muse Spark models.

28 **8.** Meta objects to the definition of “META,” “YOU,” and “YOUR” as overbroad,

1 unduly burdensome, and disproportionate to the needs of the case. Meta will construe “META,”
2 “YOU,” or “YOUR” to mean Meta Platforms, Inc.

3 **9.** Meta objects to the definition of “PIRATED,” “PIRACY,” and “PIRATED
4 MATERIAL” to the extent it calls for legal conclusions and assumes disputed issues. Meta further
5 objects that the definition is phrased in a way that is argumentative, prejudicial, and lacks
6 foundation. Meta is not in a position to know whether any particular work is subject to copyright
7 protection or whether third-party repositories lacked authorization to host or possess such works.

8 **10.** Meta objects to the definition of “SHADOW LIBRARY” and “SHADOW
9 LIBRARIES” to the extent it calls for legal conclusions and assumes disputed issues. Meta further
10 objects that the definition is phrased in a way that is argumentative, prejudicial, and lacks
11 foundation. Meta further objects to this definition as overbroad, unduly burdensome, and
12 disproportionate to the needs of the case, including (but not limited to) the extent it refers to non-
13 textual materials that are not relevant to any party’s claims or defenses and to the extent it refers
14 vaguely to “media and similar materials.” Meta is not in a position to know whether any particular
15 work is subject to copyright protection or whether third-party repositories lacked authorization to
16 host or possess such works. Meta further objects to this definition to the extent that it incorporates
17 the objectionable portions of the term “DATASETS.” Without any admission with respect to
18 content or nature, Meta will construe the term “SHADOW LIBRARY” to refer to certain of the
19 third-party datasets identified by Plaintiff, namely Anna’s Archive, Bibliotik, Books3, Library
20 Genesis (or LibGen), Sci-Hub, The Pile, and Z-Library.

21 **11.** Meta objects to the definition of “WEB SCRAPING” as vague, ambiguous,
22 overbroad, unduly burdensome, and disproportionate to the needs of the case. In particular, the
23 extensive list of undefined terms, including “extraction, collection, copying, downloading,
24 crawling, indexing, harvesting, or retrieval” and “aggregation, storage, processing” are susceptible
25 to multiple definitions, rendering this definition unintelligibly ambiguous. Meta further objects to
26 the phrase “images, metadata, or other content” as overbroad and disproportionate to the needs of
27 the case, to the extent it refers to training data other than text data that is not relevant to any party’s
28 claims or defenses. Meta further objects to this definition to the extent that it incorporates the

1 objectionable portions of the terms “SHADOW LIBRARIES” and “LARGE LANGUAGE
2 MODELS.” Meta will construe “WEB SCRAPING” to mean the automated collection of text data
3 from the public internet for use in training the Meta Language Models (as construed above).

4 **III. General Objections**

5 Meta hereby incorporates the following general objections into each of its specific
6 responses and objections to the individual Interrogatories as if fully set forth therein:

7 **1.** Meta incorporates by reference each and every General Objection set forth below
8 into each and every specific Response. From time to time, a specific Response may repeat a
9 General Objection for emphasis or some other reason. The failure to repeat any General Objection
10 in any specific Response shall not be interpreted as a waiver of any General Objection to that
11 Response.

12 **2.** Any information provided in response to any individual Interrogatory is made
13 without waiver of, and subject to, the General Objections and any additional objections asserted in
14 response to that specific Interrogatory.

15 **3.** Meta objects to the Interrogatories to the extent that they impose any differing or
16 additional obligations from those required by the Federal Rules, the Local Rules, or any other
17 applicable rule, law, or doctrine, the forthcoming ESI Order and the Protective Order entered in
18 this action (the “Applicable Laws, Rules, and Agreements”), on the ground that such a requirement
19 exceeds the scope of permissible discovery and attempts to impose an unreasonable burden and
20 expense on Meta. To the extent any Interrogatory conflicts with, or purports to impose additional
21 or different duties and obligations, Meta will respond in accordance with the Applicable Laws,
22 Rules, and Agreements.

23 **4.** Meta objects to the Interrogatories to the extent that they are overly broad, vague,
24 ambiguous, and unduly burdensome; or seek documents and information that are neither relevant
25 nor proportional to the needs of this action.

26 **5.** Meta objects to the Interrogatories to the extent they seek information or documents
27 or seek to impose a search for information or documents: (a) not within Meta’s possession, custody,
28 or control; (b) not maintained by Meta in the normal course of business; (c) already in the

1 possession, custody, or control of Plaintiff; (d) readily available through public sources or from
2 sources that are more convenient, less burdensome, or less expensive; or (e) from sources that are
3 more readily available to Plaintiff than to Meta. Meta further objects to the extent the burden or
4 expense of the proposed discovery outweighs its likely benefit.

5 **6.** Meta objects to the Interrogatories to the extent that they seek documents and
6 information protected from disclosure by privileges and other protections from production,
7 including, without limitation: (a) the attorney-client privilege; (b) the work-product doctrine; or (c)
8 any other constitutional, statutory, common law or regulatory protection, immunity, or proscription
9 from disclosure. In responding to the Interrogatories, Meta will not produce information or
10 documents protected by such privileges. Where Meta withholds information under claim of
11 privilege, Meta will adhere to the requirements under the forthcoming ESI Order. Meta does not
12 intend the inadvertent production of any privileged or protected information to constitute a waiver
13 of Meta's rights to assert any applicable privilege or protection, and Meta further reserves the right
14 to demand that Plaintiff return, destroy, or sequester any privileged or protected documents
15 inadvertently produced and all copies thereof consistent with Fed. R. Civ. P. 26(b)(5)(B) and the
16 terms and conditions of the forthcoming ESI Order and the Protective Order entered in this action.

17 **7.** Meta objects to the Interrogatories to the extent that they purport to require Meta to
18 provide information or documents in violation of a legal, contractual, or other obligation of
19 nondisclosure owed to a third party. Meta will not provide information or documents subject to
20 any such obligation unless and until it receives the necessary consent from any such third party or,
21 in the absence of such consent, unless and until it is ordered to do so by a court of competent
22 jurisdiction.

23 **8.** Meta objects to the Interrogatories to the extent they call for, or can be interpreted
24 as calling for, Meta to make legal conclusions, or to the extent they assume disputed issues or are
25 phrased in such a way as to be lacking foundation, argumentative, prejudicial, or otherwise
26 improper.

27 **9.** Meta objects to the Interrogatories to the extent that they seek confidential, trade
28 secret, competitively sensitive, business, financial, or other proprietary information. To the extent

documents or information containing any such information are nonprivileged, responsive to the Interrogatories, and are not otherwise objectionable, Meta will only produce such documents and information subject to the forthcoming ESI Order and the Protective Order entered in this action. Meta further reserves the right to redact or otherwise withhold any confidential, proprietary, trade secret, or competitively sensitive information that is neither relevant nor proportional to the needs of this action.

10. Meta objects to the Interrogatories to the extent they seek documents that are not proportionate to the needs of the case and/or not relevant to any party's claims or defenses.

11. Meta objects to the Interrogatories that seek to impose an obligation to investigate or discover information or materials from third parties or sources that are equally accessible to Plaintiff as duplicative, overbroad, unduly burdensome, and oppressive.

12. Meta reserves the right to assert additional objections, or to supplement its Responses as appropriate, particularly if any additional information regarding the Interrogatories or the underlying claims at issue is provided.

IV. Objections and Responses to Individual Interrogatories

INTERROGATORY NO. 1:

Which CHICKEN SOUP FOR THE SOUL WORKS did YOU obtain from a SHADOW LIBRARY?

RESPONSE TO INTERROGATORY NO. 1:

Meta incorporates by reference its objections and definitions above, including to the terms CHICKEN SOUP FOR THE SOUL WORKS, YOU, and SHADOW LIBRARY.

Subject to and without waiving the foregoing objections, Meta is undertaking a reasonable investigation to identify which CHICKEN SOUP FOR THE SOUL WORKS, if any, Meta downloaded as part of Anna's Archive, Books3 and LibGen for use in training Meta's LARGE LANGUAGE MODELS. As previously communicated to counsel for CHICKEN SOUP FOR THE SOUL, Meta may need additional information, including the text of the CHICKEN SOUP FOR THE SOUL WORKS, in order to provide a more complete response to this Interrogatory. Meta will supplement this response on a rolling basis as it identifies responsive information.

INTERROGATORY NO. 2:

Identify each CHICKEN SOUP FOR THE SOUL WORK that YOU obtained through WEB SCRAPING.

RESPONSE TO INTERROGATORY NO. 2:

Meta incorporates by reference its objections and definitions above, including to the terms CHICKEN SOUP FOR THE SOUL WORK, YOU, and WEB SCRAPING.

Subject to and without waiving the foregoing objections, Meta is undertaking a reasonable investigation to identify which CHICKEN SOUP FOR THE SOUL WORKS, if any, Meta downloaded as part of any web archiving activity conducted by Meta's SpiderMate web archiver for use in training Meta's LARGE LANGUAGE MODELS. As previously communicated to counsel for CHICKEN SOUP FOR THE SOUL, Meta may need additional information, including the text of the CHICKEN SOUP FOR THE SOUL WORKS, in order to provide a more complete response to this Interrogatory. Meta will supplement this response on a rolling basis as it identifies responsive information.

INTERROGATORY NO. 3:

For each CHICKEN SOUP FOR THE SOUL WORK that YOU obtained from a SHADOW LIBRARY or through WEB SCRAPING, when and how did you obtain it? Identify and describe each instance in detail, including the source or sources, date or dates of acquisition, and means or method of acquisition.

RESPONSE TO INTERROGATORY NO. 3:

Meta incorporates by reference its objections and definitions above, including to the terms CHICKEN SOUP FOR THE SOUL WORK, YOU, SHADOW LIBRARY, and WEB SCRAPING.

Meta objects to this interrogatory to the extent it is duplicative of information sought by Interrogatory Nos. 1 and 2. Meta further objects to this interrogatory as vague, ambiguous, overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent the phrase "[i]dentify and describe each instance in detail, including" seeks unspecified information beyond the recited request for "the source or sources, date or dates of acquisition, and means or method of acquisition" of data obtained from a SHADOW LIBRARY or WEB SCRAPING.

1 Subject to and without waiving the foregoing objections, as stated for Interrogatory Nos. 1
2 and 2, Meta is undertaking a reasonable investigation to identify which CHICKEN SOUP FOR
3 THE SOUL WORKS, if any (1) Meta downloaded as part of Anna's Archive, Books3, and/or
4 LibGen for use in training Meta's LARGE LANGUAGE MODELS and (2) Meta downloaded as
5 part of any web archiving activity conducted by Meta's SpiderMate web archiver for use in training
6 Meta's LARGE LANGUAGE MODELS. Meta will provide reasonably available information
7 regarding the source, timing, and method of download. As previously communicated to counsel for
8 CHICKEN SOUP FOR THE SOUL, Meta may need additional information, including the text of
9 the CHICKEN SOUP FOR THE SOUL WORKS, in order to provide a more complete response to
10 this Interrogatory. Meta will supplement this response on a rolling basis as it identifies responsive
11 information.

12 **INTERROGATORY NO. 4:**

13 Which CHICKEN SOUP FOR THE SOUL WORKS did YOU use, in whole or in part, to train any
14 of YOUR LLM MODELS?

15 **RESPONSE TO INTERROGATORY NO. 4:**

16 Meta incorporates by reference its objections and definitions above, including to the terms
17 CHICKEN SOUP FOR THE SOUL WORKS, YOU, and YOUR LLM MODELS.

18 Meta further objects to this interrogatory to the term "train" as vague and ambiguous to the
19 extent it is undefined. Meta will interpret the term "train" as the act of pre-training and/or fine-
20 tuning a large language model.

21 Subject to and without waiving the foregoing objections, Meta is undertaking a reasonable
22 investigation to identify which CHICKEN SOUP FOR THE SOUL WORKS, if any, were used to
23 pre-train Meta's LLM MODELS. As previously communicated to counsel for CHICKEN SOUP
24 FOR THE SOUL, Meta may need additional information, including the text of the CHICKEN
25 SOUP FOR THE SOUL WORKS, in order to provide a more complete response to this
26 Interrogatory. Meta will supplement this response on a rolling basis as it identifies responsive
27 information.
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1 **INTERROGATORY NO. 5:**

2 For each CHICKEN SOUP FOR THE SOUL WORK that YOU used, in whole or in part, to train
3 any of YOUR LLM MODELS, when and how did you do so? IDENTIFY and describe each
4 instance in detail.

5 **RESPONSE TO INTERROGATORY NO. 5:**

6 Meta incorporates by reference its objections and definitions above, including to the terms
7 CHICKEN SOUP FOR THE SOUL WORKS, YOU, and YOUR LLM MODELS.

8 Meta further objects to this interrogatory to the term “train” as vague and ambiguous to the
9 extent it is undefined. Meta will interpret the term “train” as the act of pre-training and/or fine-
10 tuning a large language model. Meta further objects to the phrase “how did you do so?” as it does
11 not specify which actions the interrogatory seeks information about. Meta will interpret the phrase
12 “how did you do so?” as seeking a high-level general description of the way a work like a
13 CHICKEN SOUP FOR THE SOUL WORK would be used in the pre-training process of Meta’s
14 LLM MODELS. Meta further objects to this interrogatory as vague, ambiguous, overbroad, unduly
15 burdensome, and disproportionate to the needs of the case to the extent the phrase “[i]dentify and
16 describe each instance in detail” seeks unspecified information about the use of CHICKEN SOUP
17 FOR THE SOUL WORKS in pre-training. Meta will interpret this phrase to seek a high-level
18 general description of the way a work like a CHICKEN SOUP FOR THE SOUL WORK would be
19 used in the pre-training process of Meta’s LLM MODELS.

20 Subject to and without waiving the foregoing objections, as stated for Interrogatory No. 4,
21 Meta is undertaking a reasonable investigation to identify which CHICKEN SOUP FOR THE
22 SOUL WORKS, if any, that were used to pre-train Meta’s LLM MODELS and Meta will provide
23 a high-level general description of the way a work like a CHICKEN SOUP FOR THE SOUL
24 WORK would be used in the pre-training process of Meta’s LLM MODELS. As previously
25 communicated to counsel for CHICKEN SOUP FOR THE SOUL, Meta may need additional
26 information, including the text of the CHICKEN SOUP FOR THE SOUL WORKS, in order to
27 provide a more complete response to this Interrogatory. Meta will supplement this response on a
28 rolling basis as it identifies responsive information.

1 **INTERROGATORY NO. 6:**

2 IDENTIFY each CHICKEN SOUP FOR THE SOUL WORK from which YOU removed or altered
3 any COPYRIGHT MANAGEMENT INFORMATION.

4 **RESPONSE TO INTERROGATORY NO. 6:**

5 Meta incorporates by reference its objections and definitions above, including to the terms
6 CHICKEN SOUP FOR THE SOUL WORKS, YOU, and COPYRIGHT MANAGEMENT
7 INFORMATION.

8 Meta further objects to this interrogatory as overbroad, unduly burdensome, and
9 disproportionate to the needs of the case to the extent it seeks information about CHICKEN SOUP
10 FOR THE SOUL WORKS that were not used as part of Meta's pre-training of large language
11 models.

12 Subject to and without waiving the foregoing objections, Meta is undertaking a reasonable
13 investigation to identify for which CHICKEN SOUP FOR THE SOUL WORKS identified in its
14 responses to Interrogatory Nos. 1 and 2 Meta is able to reasonably determine that COPYRIGHT
15 MANAGEMENT INFORMATION was removed or altered by Meta. As previously
16 communicated to counsel for CHICKEN SOUP FOR THE SOUL, Meta may need additional
17 information, including the text of the CHICKEN SOUP FOR THE SOUL WORKS, in order to
18 provide a more complete response to this Interrogatory. Meta will supplement this response on a
19 rolling basis as it identifies responsive information.

20 **INTERROGATORY NO. 7:**

21 Explain what you did with each CHICKEN SOUP FOR THE SOUL WORK that YOU obtained
22 from a SHADOW LIBRARY or through WEB SCRAPING or that YOU used, in whole or in part,
23 to train any of YOUR LLM MODELS. For each CHICKEN SOUP FOR THE SOUL WORK, your
24 explanation should state whether, when, and how it was:

25 (a) retained, stored, or preserved;

26 (b) ingested;

27 (c) processed;

28 (d) tokenized;

- 1 (e) duplicated or reproduced;
- 2 (f) de-duplicated;
- 3 (g) stripped of COPYRIGHT MANAGEMENT INFORMATION;
- 4 (h) modified or altered in any other way;
- 5 (i) distributed;
- 6 (j) torrented;
- 7 (k) incorporated, in whole or in part, into any of YOUR LLM MODELS or model
- 8 parameters; or
- 9 (l) deleted.

10 **RESPONSE TO INTERROGATORY NO. 7:**

11 Meta incorporates by reference its objections and definitions above, including to the terms
12 CHICKEN SOUP FOR THE SOUL WORKS, SHADOW LIBRARY, WEB SCRAPING,
13 COPYRIGHT MANAGEMENT INFORMATION, YOU, and YOUR LLM MODELS.

14 Meta further objects to this interrogatory as compound because it comprises at least twelve
15 subparts and would potentially exceed the allowable number of interrogatories under the Federal
16 Rules of Civil Procedure. Meta further objects to the terms “[e]xplain what you did”, “processed”,
17 “tokenized”, “stripped”, “modified or altered in any other way”, “incorporated, in whole or in part,
18 into any of YOUR LLM MODELS or model parameters” as vague and ambiguous. Meta further
19 objects to this interrogatory to the extent it seeks information sought by Interrogatory Nos. 1-6.
20 Meta further objects to this interrogatory to the extent it requires Meta to create or re-create
21 information or data that is not in Meta’s possession, custody, or control.

22 Subject to and without waiving the foregoing objections, as stated for Interrogatory Nos. 1-
23 6, Meta is undertaking a reasonable investigation to identify which CHICKEN SOUP FOR THE
24 SOUL WORKS, if any, were downloaded and used to pre-train Meta’s LLM MODELS. Meta will
25 provide a high-level general description of the way a work like a CHICKEN SOUP FOR THE
26 SOUL WORK would be utilized by Meta in conjunction with Meta’s LLM MODELS. As
27 previously communicated to counsel for CHICKEN SOUP FOR THE SOUL, Meta may need
28 additional information, including the text of the CHICKEN SOUP FOR THE SOUL WORKS, in

1 order to provide a more complete response to this Interrogatory. Meta will supplement this
2 response on a rolling basis as it identifies responsive information.

3 **INTERROGATORY NO. 8:**

4 For each response to every Request for Admission served on YOU by Plaintiff in this case
5 that is not an unqualified admission, IDENTIFY the following information:

- 6 (a) The number of the Request for Admission;
7 (b) All facts on which YOU base your response;
8 (c) All PERSONS who have knowledge of those facts; and
9 (d) All DOCUMENTS that support YOUR response along with the custodian of those
10 DOCUMENTS.

11 **RESPONSE TO INTERROGATORY NO. 8:**

12 Meta incorporates by reference its objections and definitions above, including to the terms
13 YOU and DOCUMENTS.

14 Meta further objects to this interrogatory as compound because it comprises multiple
15 subparts and would potentially exceed the allowable number of interrogatories under the Federal
16 Rules of Civil Procedure. Meta will respond to this interrogatory to the extent required by Local
17 Rules 33-2 and 36-2.

18 Meta is willing to meet and confer regarding the appropriate scope, if any, of a response to
19 this interrogatory.
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1 Dated: June 22, 2026

COOLEY LLP

2
3 By: /s/ Phillip E. Morton

4 Phillip E. Morton

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CERTIFICATE OF SERVICE

I am a citizen of the United States and a resident of the State of New York. I am employed in New York County, State of New York. I am over the age of eighteen years, and not a party to the within action. My business address is Dunn Isaacson Rhee LLP, 11 Park Place, New York, New York 10007. On the date set forth below I served the documents described below in the manner described below:

**DEFENDANT META PLATFORMS, INC.'S RESPONSES AND OBJECTIONS TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES [NOS. 1-8]**

☒ (BY ELECTRONIC MAIL) I am personally and readily familiar with the business practice of Dunn Isaacson Rhee LLP for the preparation and processing of documents in portable document format (PDF) for e-mailing, and I caused said documents to be prepared in PDF and then served by electronic mail to the parties listed below.

on the following part(ies) in this action:

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Executed on June 22, 2026, at Brooklyn, New York.

/s/ Christine M. Ray

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

COGNELLA, INC.,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:26-cv-04053-VC

**DEFENDANT META PLATFORMS, INC.'S
RESPONSES AND OBJECTIONS TO
PLAINTIFF'S FIRST SET OF
INTERROGATORIES**

Judge: Hon. Vince Chhabria

1 **PROPOUNDING PARTY: PLAINTIFF COGNELLA, INC.**

2 **RESPONDING PARTY: DEFENDANT META PLATFORMS, INC.**

3 **SET NUMBER: ONE**

4 Pursuant to Federal Rules of Civil Procedure 26 and 33, and Local Rule 33 of the United
5 States District Court for the Northern District of California, Defendant Meta Platforms, Inc.
6 (“Meta”) hereby objects and responds as follows to Plaintiff Cognella, Inc.’s (“Plaintiff”) First Set
7 of Interrogatories (“Interrogatories”).

8 **I. Responses to All Interrogatories**

9 1. Meta’s responses to these Interrogatories are made to the best of Meta’s present
10 knowledge, information, and belief. Said responses are at all times subject to such additional or
11 different information that discovery or further investigation may disclose, and while based on the
12 present state of Meta’s recollection, are subject to such refreshing of recollection, and such
13 additional knowledge of facts, as may result from Meta’s further discovery or investigation. Meta
14 reserves the right to make any use of, or to introduce at any hearing and at trial, information and/or
15 documents responsive to these Interrogatories but discovered subsequent to the date of these
16 responses, including, but not limited to, any such information or documents obtained in discovery
17 herein.

18 2. To the extent that Meta responds to an Interrogatory by stating that Meta will
19 provide information or documents that Meta deems to embody material that is private, business
20 confidential, proprietary, trade secret, or otherwise protected from disclosure pursuant to Federal
21 Rule of Civil Procedure 26(c) and/or Federal Rule of Evidence 501, Meta will only do so subject
22 to the Protective Order (Dkt. 35) governing the unauthorized use or disclosure of such information
23 or documents with a designated “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL -
24 ATTORNEYS’ EYES ONLY” or “HIGHLY CONFIDENTIAL – SOURCE CODE” distinction.

25 3. Meta reserves all objections or other questions as to the competency, relevance,
26 materiality, privilege or admissibility as evidence in any subsequent proceeding in or trial of this
27 or any other action for any purpose whatsoever of Meta’s responses herein and any document or
28 thing identified or provided in response to the Interrogatories.

II. Objections to Instructions and Definitions

Whether or not separately set forth in response to each Interrogatory, Meta makes these objections to the following Instructions and Definitions.

1. Meta objects to the definition of “COPYRIGHT MANAGEMENT INFORMATION” to the extent it calls for a legal conclusion. Specifically, a determination of whether any particular data, text, or metadata constitutes “Copyright Management Information” under 17 U.S.C. § 1202(c) is inherently legal in nature and calls for a legal conclusion. Meta is not in a position to know whether any particular information qualifies as legally protected Copyright Management Information and a determination of such is not within Meta’s possession, custody, or control. Meta further objects to this definition as vague and ambiguous, overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent it includes identifying information for persons that “created” copyrighted works.

2. Meta objects to the definition of “COGNELLA WORK(S)” as overbroad, unduly burdensome and disproportionate to the needs of the case to the extent it puts the burden on Meta to determine which works purportedly “belong” to COGNELLA. Meta further objects to the term “belong” as vague and ambiguous as it is unclear what form of possession or ownership is intended by the use of this term. Without agreeing that COGNELLA possesses or owns any valid copyright in any specific works, Meta will interpret the term COGNELLA WORKS to refer to the specific works identified in Exhibit A to the Interrogatories.

3. Meta objects to the definitions of “COMMUNICATIONS” and “DOCUMENT(S)” to the extent these definitions are inconsistent with and otherwise seek to circumvent the custodian and search term limits for electronic communications (including emails and other electronic correspondence, and documents attached thereto), as provided in the forthcoming ESI Order.

4. Meta further objects to the definitions of “COMMUNICATIONS” and “DOCUMENT(S)” to the extent they seek to expand or alter the scope of the Federal Rules of Civil Procedure, the Local Rules of this Court, or the forthcoming ESI Order. Meta further objects to these definitions to the extent they seek Meta to produce documents that are not reasonably accessible because of undue burden or cost pursuant to Fed. R. Civ. P. 26(b)(2)(B), which are

1 unduly burdensome to preserve and search, or which otherwise, under the proportionality factors,
2 should not be preserved.

3 **5.** Meta objects to the definitions of “CORPORA” and “DATASET(S)” as overbroad,
4 unduly burdensome, and disproportionate to the needs of the case, including (but not limited to) the
5 extent they refer to non-textual materials that are not relevant to any party’s claims or defenses and
6 to the extent they refer vaguely to “other content.” Without any admission with respect to content
7 or nature, Meta will construe the term “DATASET(S)” to refer to Anna’s Archive, Bibliotik,
8 Books3, C4, Library Genesis (or LibGen), Sci-Hub, The Pile, and Z-Library.

9 **6.** Meta objects to the definition of “INFRINGE,” “INFRINGED,” and “INFRINGES”
10 to the extent it calls for a legal conclusion. Specifically, a determination of whether any conduct
11 constitutes copyright infringement is inherently legal in nature and calls for a legal conclusion.
12 Meta is not in a position to know whether any particular conduct infringes on a legally protected
13 work and a determination of such is not within Meta’s possession, custody, or control.

14 **7.** Meta objects to the definition of “LARGE LANGUAGE MODEL(S)” and “LLM
15 MODEL(S)” as vague and ambiguous, overbroad, unduly burdensome, and disproportionate to the
16 needs of the case. In particular, the phrase “any machine learning model, neural network,
17 generative artificial intelligence model, transformer model, or similar computational system trained
18 on large quantities of text or other data” is overly broad and encompasses tools and services that
19 are not relevant to any party’s claims or defenses. Meta further objects to this definition to the
20 extent that it purports to require Meta to produce documents or information concerning large
21 language models that were not publicly released and/or were not trained on corpuses of text that
22 allegedly include any of Plaintiff’s allegedly copyrighted works. Meta further objects that the
23 phrase “process, predict, generate, summarize, classify, or otherwise manipulate natural language
24 or content” renders the definition vague, ambiguous, confusing, and overly broad. Meta will
25 construe “LARGE LANGUAGE MODEL(S)” and “LLM MODEL(S)” to mean the publicly
26 released Llama 1, Llama 2, Llama 3, Llama 4, and Muse Spark models.

27 **8.** Meta objects to the definition of “META,” “YOU,” and “YOUR” as overbroad,
28 unduly burdensome, and disproportionate to the needs of the case. Meta will construe “META,”

1 “YOU,” or “YOUR” to mean Meta Platforms, Inc.

2 **9.** Meta objects to the definition of “PIRATED,” “PIRACY,” and “PIRATED
3 MATERIAL” to the extent it calls for legal conclusions and assumes disputed issues. Meta further
4 objects that the definition is phrased in a way that is argumentative, prejudicial, and lacks
5 foundation. Meta is not in a position to know whether any particular work is subject to copyright
6 protection or whether third-party repositories lacked authorization to host or possess such works.

7 **10.** Meta objects to the definition of “SHADOW LIBRARY” and “SHADOW
8 LIBRARIES” to the extent it calls for legal conclusions and assumes disputed issues. Meta further
9 objects that the definition is phrased in a way that is argumentative, prejudicial, and lacks
10 foundation. Meta further objects to this definition as overbroad, unduly burdensome, and
11 disproportionate to the needs of the case, including (but not limited to) the extent it refers to non-
12 textual materials that are not relevant to any party’s claims or defenses and to the extent it refers
13 vaguely to “media and similar materials.” Meta is not in a position to know whether any particular
14 work is subject to copyright protection or whether third-party repositories lacked authorization to
15 host or possess such works. Meta further objects to this definition to the extent that it incorporates
16 the objectionable portions of the term “DATASETS.” Without any admission with respect to
17 content or nature, Meta will construe the term “SHADOW LIBRARY” to refer to certain of the
18 third-party datasets identified by Plaintiff, namely Anna’s Archive, Bibliotik, Books3, Library
19 Genesis (or LibGen), Sci-Hub, The Pile, and Z-Library.

20 **11.** Meta objects to the definition of “WEB SCRAPING” as vague, ambiguous,
21 overbroad, unduly burdensome, and disproportionate to the needs of the case. In particular, the
22 extensive list of undefined terms, including “extraction, collection, copying, downloading,
23 crawling, indexing, harvesting, or retrieval” and “aggregation, storage, processing” are susceptible
24 to multiple definitions, rendering this definition unintelligibly ambiguous. Meta further objects to
25 the phrase “images, metadata, or other content” as overbroad and disproportionate to the needs of
26 the case, to the extent it refers to training data other than text data that is not relevant to any party’s
27 claims or defenses. Meta further objects to this definition to the extent that it incorporates the
28 objectionable portions of the terms “SHADOW LIBRARIES” and “LARGE LANGUAGE

1 MODELS.” Meta will construe “WEB SCRAPING” to mean the automated collection of text data
2 from the public internet for use in training the Meta Language Models (as construed above).

3 **III. General Objections**

4 Meta hereby incorporates the following general objections into each of its specific
5 responses and objections to the individual Interrogatories as if fully set forth therein:

6 1. Meta incorporates by reference each and every General Objection set forth below
7 into each and every specific Response. From time to time, a specific Response may repeat a
8 General Objection for emphasis or some other reason. The failure to repeat any General Objection
9 in any specific Response shall not be interpreted as a waiver of any General Objection to that
10 Response.

11 2. Any information provided in response to any individual Interrogatory is made
12 without waiver of, and subject to, the General Objections and any additional objections asserted in
13 response to that specific Interrogatory.

14 3. Meta objects to the Interrogatories to the extent that they impose any differing or
15 additional obligations from those required by the Federal Rules, the Local Rules, or any other
16 applicable rule, law, or doctrine, the forthcoming ESI Order and the Protective Order entered in
17 this action (the “Applicable Laws, Rules, and Agreements”), on the ground that such a requirement
18 exceeds the scope of permissible discovery and attempts to impose an unreasonable burden and
19 expense on Meta. To the extent any Interrogatory conflicts with, or purports to impose additional
20 or different duties and obligations, Meta will respond in accordance with the Applicable Laws,
21 Rules, and Agreements.

22 4. Meta objects to the Interrogatories to the extent that they are overly broad, vague,
23 ambiguous, and unduly burdensome; or seek documents and information that are neither relevant
24 nor proportional to the needs of this action.

25 5. Meta objects to the Interrogatories to the extent they seek information or documents
26 or seek to impose a search for information or documents: (a) not within Meta’s possession, custody,
27 or control; (b) not maintained by Meta in the normal course of business; (c) already in the
28 possession, custody, or control of Plaintiff; (d) readily available through public sources or from

1 sources that are more convenient, less burdensome, or less expensive; or (e) from sources that are
2 more readily available to Plaintiff than to Meta. Meta further objects to the extent the burden or
3 expense of the proposed discovery outweighs its likely benefit.

4 **6.** Meta objects to the Interrogatories to the extent that they seek documents and
5 information protected from disclosure by privileges and other protections from production,
6 including, without limitation: (a) the attorney-client privilege; (b) the work-product doctrine; or (c)
7 any other constitutional, statutory, common law or regulatory protection, immunity, or proscription
8 from disclosure. In responding to the Interrogatories, Meta will not produce information or
9 documents protected by such privileges. Where Meta withholds information under claim of
10 privilege, Meta will adhere to the requirements under the forthcoming ESI Order. Meta does not
11 intend the inadvertent production of any privileged or protected information to constitute a waiver
12 of Meta's rights to assert any applicable privilege or protection, and Meta further reserves the right
13 to demand that Plaintiff return, destroy, or sequester any privileged or protected documents
14 inadvertently produced and all copies thereof consistent with Fed. R. Civ. P. 26(b)(5)(B) and the
15 terms and conditions of the forthcoming ESI Order and the Protective Order entered in this action.

16 **7.** Meta objects to the Interrogatories to the extent that they purport to require Meta to
17 provide information or documents in violation of a legal, contractual, or other obligation of
18 nondisclosure owed to a third party. Meta will not provide information or documents subject to
19 any such obligation unless and until it receives the necessary consent from any such third party or,
20 in the absence of such consent, unless and until it is ordered to do so by a court of competent
21 jurisdiction.

22 **8.** Meta objects to the Interrogatories to the extent they call for, or can be interpreted
23 as calling for, Meta to make legal conclusions, or to the extent they assume disputed issues or are
24 phrased in such a way as to be lacking foundation, argumentative, prejudicial, or otherwise
25 improper.

26 **9.** Meta objects to the Interrogatories to the extent that they seek confidential, trade
27 secret, competitively sensitive, business, financial, or other proprietary information. To the extent
28 documents or information containing any such information are nonprivileged, responsive to the

Interrogatories, and are not otherwise objectionable, Meta will only produce such documents and information subject to the forthcoming ESI Order and the Protective Order entered in this action. Meta further reserves the right to redact or otherwise withhold any confidential, proprietary, trade secret, or competitively sensitive information that is neither relevant nor proportional to the needs of this action.

10. Meta objects to the Interrogatories to the extent they seek documents that are not proportionate to the needs of the case and/or not relevant to any party's claims or defenses.

11. Meta objects to the Interrogatories that seek to impose an obligation to investigate or discover information or materials from third parties or sources that are equally accessible to Plaintiff as duplicative, overbroad, unduly burdensome, and oppressive.

12. Meta reserves the right to assert additional objections, or to supplement its Responses as appropriate, particularly if any additional information regarding the Interrogatories or the underlying claims at issue is provided.

IV. Objections and Responses to Individual Interrogatories

INTERROGATORY NO. 1:

Which COGNELLA WORKS did YOU obtain from a SHADOW LIBRARY?

RESPONSE TO INTERROGATORY NO. 1:

Meta incorporates by reference its objections and definitions above, including to the terms COGNELLA WORKS, YOU, and SHADOW LIBRARY.

Subject to and without waiving the foregoing objections, Meta is undertaking a reasonable investigation to identify which COGNELLA WORKS, if any, Meta downloaded as part of Anna's Archive, Books3 and LibGen for use in training Meta's LARGE LANGUAGE MODELS. As previously communicated to counsel for COGNELLA, Meta may need additional information, including the text of the COGNELLA WORKS, in order to provide a more complete response to this Interrogatory. Meta will supplement this response on a rolling basis as it identifies responsive information.

INTERROGATORY NO. 2:

Identify each COGNELLA WORK that YOU obtained through WEB SCRAPING.

1 RESPONSE TO INTERROGATORY NO. 2:

2 Meta incorporates by reference its objections and definitions above, including to the terms
3 COGNELLA WORK, YOU, and WEB SCRAPING.

4 Subject to and without waiving the foregoing objections, Meta is undertaking a reasonable
5 investigation to identify which COGNELLA WORKS, if any, Meta downloaded as part of any web
6 archiving activity conducted by Meta's SpiderMate web archiver for use in training Meta's LARGE
7 LANGUAGE MODELS. As previously communicated to counsel for COGNELLA, Meta may
8 need additional information, including the text of the COGNELLA WORKS, in order to provide a
9 more complete response to this Interrogatory. Meta will supplement this response on a rolling basis
10 as it identifies responsive information.

11 INTERROGATORY NO. 3:

12 For each COGNELLA WORK that YOU obtained from a SHADOW LIBRARY or through
13 WEB SCRAPING, when and how did you obtain it? Identify and describe each instance in detail,
14 including the source or sources, date or dates of acquisition, and means or method of acquisition.

15 RESPONSE TO INTERROGATORY NO. 3:

16 Meta incorporates by reference its objections and definitions above, including to the terms
17 COGNELLA WORK, YOU, SHADOW LIBRARY, and WEB SCRAPING.

18 Meta objects to this interrogatory to the extent it is duplicative of information sought by
19 Interrogatory Nos. 1 and 2. Meta further objects to this interrogatory as vague, ambiguous,
20 overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent the
21 phrase "[i]dentify and describe each instance in detail, including" seeks unspecified information
22 beyond the recited request for "the source or sources, date or dates of acquisition, and means or
23 method of acquisition" of data obtained from a SHADOW LIBRARY or WEB SCRAPING.

24 Subject to and without waiving the foregoing objections, as stated for Interrogatory Nos. 1
25 and 2, Meta is undertaking a reasonable investigation to identify which COGNELLA WORKS, if
26 any (1) Meta downloaded as part of Anna's Archive, Books3, and/or LibGen for use in training
27 Meta's LARGE LANGUAGE MODELS and (2) Meta downloaded as part of any web archiving
28 activity conducted by Meta's SpiderMate web archiver for use in training Meta's LARGE

1 LANGUAGE MODELS. Meta will provide reasonably available information regarding the source,
2 timing, and method of download. As previously communicated to counsel for COGNELLA, Meta
3 may need additional information, including the text of the COGNELLA WORKS, in order to
4 provide a more complete response to this Interrogatory. Meta will supplement this response on a
5 rolling basis as it identifies responsive information.

6 **INTERROGATORY NO. 4:**

7 Which COGNELLA WORKS did YOU use, in whole or in part, to train any of YOUR LLM
8 MODELS?

9 **RESPONSE TO INTERROGATORY NO. 4:**

10 Meta incorporates by reference its objections and definitions above, including to the terms
11 COGNELLA WORKS, YOU, and YOUR LLM MODELS.

12 Meta further objects to this interrogatory to the term “train” as vague and ambiguous to the
13 extent it is undefined. Meta will interpret the term “train” as the act of pre-training and/or fine-
14 tuning a large language model.

15 Subject to and without waiving the foregoing objections, Meta is undertaking a reasonable
16 investigation to identify which COGNELLA WORKS, if any, were used to pre-train Meta’s LLM
17 MODELS. As previously communicated to counsel for COGNELLA, Meta may need additional
18 information, including the text of the COGNELLA WORKS, in order to provide a more complete
19 response to this Interrogatory. Meta will supplement this response on a rolling basis as it identifies
20 responsive information.

21 **INTERROGATORY NO. 5:**

22 For each COGNELLA WORK that YOU used, in whole or in part, to train any of YOUR
23 LLM MODELS, when and how did you do so? IDENTIFY and describe each instance in detail.

24 **RESPONSE TO INTERROGATORY NO. 5:**

25 Meta incorporates by reference its objections and definitions above, including to the terms
26 COGNELLA WORKS, YOU, and YOUR LLM MODELS.

27 Meta further objects to this interrogatory to the term “train” as vague and ambiguous to the
28 extent it is undefined. Meta will interpret the term “train” as the act of pre-training and/or fine-

1 tuning a large language model. Meta further objects to the phrase “how did you do so?” as it does
2 not specify which actions the interrogatory seeks information about. Meta will interpret the phrase
3 “how did you do so?” as seeking a high-level general description of the way a work like a
4 COGNELLA WORK would be used in the pre-training process of Meta’s LLM MODELS. Meta
5 further objects to this interrogatory as vague, ambiguous, overbroad, unduly burdensome, and
6 disproportionate to the needs of the case to the extent the phrase “[i]dentify and describe each
7 instance in detail” seeks unspecified information about the use of COGNELLA WORKS in pre-
8 training. Meta will interpret this phrase to seek a high-level general description of the way a work
9 like a COGNELLA WORK would be used in the pre-training process of Meta’s LLM MODELS.

10 Subject to and without waiving the foregoing objections, as stated for Interrogatory No. 4,
11 Meta is undertaking a reasonable investigation to identify which COGNELLA WORKS, if any,
12 that were used to pre-train Meta’s LLM MODELS and Meta will provide a high-level general
13 description of the way a work like a COGNELLA WORK would be used in the pre-training process
14 of Meta’s LLM MODELS. As previously communicated to counsel for COGNELLA, Meta may
15 need additional information, including the text of the COGNELLA WORKS, in order to provide a
16 more complete response to this Interrogatory. Meta will supplement this response on a rolling basis
17 as it identifies responsive information.

18 **INTERROGATORY NO. 6:**

19 IDENTIFY each COGNELLA WORK from which YOU removed or altered any COPYRIGHT
20 MANAGEMENT INFORMATION.

21 **RESPONSE TO INTERROGATORY NO. 6:**

22 Meta incorporates by reference its objections and definitions above, including to the terms
23 COGNELLA WORKS, YOU, and COPYRIGHT MANAGEMENT INFORMATION.

24 Meta further objects to this interrogatory as overbroad, unduly burdensome, and
25 disproportionate to the needs of the case to the extent it seeks information about COGNELLA
26 WORKS that were not used as part of Meta’s pre-training of large language models.

27 Subject to and without waiving the foregoing objections, Meta is undertaking a reasonable
28 investigation to identify for which COGNELLA WORKS identified in its responses to

Interrogatory Nos. 1 and 2 Meta is able to reasonably determine that COPYRIGHT MANAGEMENT INFORMATION was removed or altered by Meta. As previously communicated to counsel for COGNELLA, Meta may need additional information, including the text of the COGNELLA WORKS, in order to provide a more complete response to this Interrogatory. Meta will supplement this response on a rolling basis as it identifies responsive information.

INTERROGATORY NO. 7:

Explain what you did with each COGNELLA WORK that YOU obtained from a SHADOW LIBRARY or through WEB SCRAPING or that YOU used, in whole or in part, to train any of YOUR LLM MODELS. For each COGNELLA WORK, your explanation should state whether, when, and how it was:

- (a) retained, stored, or preserved;
- (b) ingested;
- (c) processed;
- (d) tokenized;
- (e) duplicated or reproduced;
- (f) de-duplicated;
- (g) stripped of COPYRIGHT MANAGEMENT INFORMATION;
- (h) modified or altered in any other way;
- (i) distributed;
- (j) torrented;
- (k) incorporated, in whole or in part, into any of YOUR LLM MODELS or model parameters; or
- (l) deleted.

RESPONSE TO INTERROGATORY NO. 7:

Meta incorporates by reference its objections and definitions above, including to the terms COGNELLA WORKS, SHADOW LIBRARY, WEB SCRAPING, COPYRIGHT MANAGEMENT INFORMATION, YOU, and YOUR LLM MODELS.

Meta further objects to this interrogatory as compound because it comprises at least twelve subparts and would potentially exceed the allowable number of interrogatories under the Federal Rules of Civil Procedure. Meta further objects to the terms “[e]xplain what you did”, “processed”, “tokenized”, “stripped”, “modified or altered in any other way”, “incorporated, in whole or in part, into any of YOUR LLM MODELS or model parameters” as vague and ambiguous. Meta further objects to this interrogatory to the extent it seeks information sought by Interrogatory Nos. 1-6. Meta further objects to this interrogatory to the extent it requires Meta to create or re-create information or data that is not in Meta’s possession, custody, or control.

Subject to and without waiving the foregoing objections, as stated for Interrogatory Nos. 1-6, Meta is undertaking a reasonable investigation to identify which COGNELLA WORKS, if any, were downloaded and used to pre-train Meta’s LLM MODELS. Meta will provide a high-level general description of the way a work like a COGNELLA WORK would be utilized by Meta in conjunction with Meta’s LLM MODELS. As previously communicated to counsel for COGNELLA, Meta may need additional information, including the text of the COGNELLA WORKS, in order to provide a more complete response to this Interrogatory. Meta will supplement this response on a rolling basis as it identifies responsive information.

INTERROGATORY NO. 8:

For each response to every Request for Admission served on YOU by Plaintiff in this case that is not an unqualified admission, IDENTIFY the following information:

- (a) The number of the Request for Admission;
- (b) All facts on which YOU base your response;
- (c) All PERSONS who have knowledge of those facts; and
- (d) All DOCUMENTS that support YOUR response along with the custodian of those DOCUMENTS.

RESPONSE TO INTERROGATORY NO. 8:

Meta incorporates by reference its objections and definitions above, including to the terms YOU and DOCUMENTS.

1 Meta further objects to this interrogatory as compound because it comprises multiple
2 subparts and would potentially exceed the allowable number of interrogatories under the Federal
3 Rules of Civil Procedure. Meta will respond to this interrogatory to the extent required by Local
4 Rules 33-2 and 36-2.

5 Meta is willing to meet and confer regarding the appropriate scope, if any, of a response to
6 this interrogatory.

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1 Dated: June 22, 2026

COOLEY LLP

2
3 By: /s/ Phillip E. Morton

4 Phillip E. Morton

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CERTIFICATE OF SERVICE

I am a citizen of the United States and a resident of the State of New York. I am employed in New York County, State of New York. I am over the age of eighteen years, and not a party to the within action. My business address is Dunn Isaacson Rhee LLP, 11 Park Place, New York, New York 10007. On the date set forth below I served the documents described below in the manner described below:

**DEFENDANT META PLATFORMS, INC.'S RESPONSES AND OBJECTIONS TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES [NOS. 1-8]**

☒ (BY ELECTRONIC MAIL) I am personally and readily familiar with the business practice of Dunn Isaacson Rhee LLP for the preparation and processing of documents in portable document format (PDF) for e-mailing, and I caused said documents to be prepared in PDF and then served by electronic mail to the parties listed below.

on the following part(ies) in this action:

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Executed on June 22, 2026, at Brooklyn, New York.

/s/ Christine M. Ray

Christine M. Ray

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

CAMBRONNE INC., et al.
Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:26-cv-03725-VC

**DEFENDANT META PLATFORMS, INC.'S
RESPONSES AND OBJECTIONS TO
PLAINTIFFS' FIRST SET OF
INTERROGATORIES**

Judge: Hon. Vince Chhabria

PROPOUNDING PARTY: PLAINTIFFS CAMBRONNE INC., LISA BARRETTA, PHILIP SHISHKIN,
JANE ADAMS, MATTHEW SACKS, AND MICHAEL KOCHIN

RESPONDING PARTY: DEFENDANT META PLATFORMS, INC.

SET NUMBER: ONE

Pursuant to Federal Rules of Civil Procedure 26 and 33, and Local Rule 33 of the United States District Court for the Northern District of California, Defendant Meta Platforms, Inc. (“Meta”) hereby objects and responds as follows to Plaintiffs Cambronne Inc., Lisa Barretta, Philip Shishkin, Jane Adams, Matthew Sacks, and Michael Kochin’s (“Plaintiffs”) First Set of Interrogatories (“Interrogatories”).

I. Responses to All Interrogatories

1. Meta’s responses to these Interrogatories are made to the best of Meta’s present knowledge, information, and belief. Said responses are at all times subject to such additional or different information that discovery or further investigation may disclose, and while based on the present state of Meta’s recollection, are subject to such refreshing of recollection, and such additional knowledge of facts, as may result from Meta’s further discovery or investigation. Meta reserves the right to make any use of, or to introduce at any hearing and at trial, information and/or documents responsive to these Interrogatories but discovered subsequent to the date of these responses, including, but not limited to, any such information or documents obtained in discovery herein.

2. To the extent that Meta responds to an Interrogatory by stating that Meta will provide information or documents that Meta deems to embody material that is private, business confidential, proprietary, trade secret, or otherwise protected from disclosure pursuant to Federal Rule of Civil Procedure 26(c) and/or Federal Rule of Evidence 501, Meta will only do so subject to the Protective Order (Dkt. 53) governing the unauthorized use or disclosure of such information or documents with a designated “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL - ATTORNEYS’ EYES ONLY” or “HIGHLY CONFIDENTIAL – SOURCE CODE” distinction.

3. Meta reserves all objections or other questions as to the competency, relevance, materiality, privilege or admissibility as evidence in any subsequent proceeding in or trial of this or any other

1 action for any purpose whatsoever of Meta's responses herein and any document or thing identified
2 or provided in response to the Interrogatories.

3 **II. Objections to Instructions and Definitions**

4 Whether or not separately set forth in response to each Interrogatory, Meta makes these
5 objections to the following Instructions and Definitions.

6 1. Meta objects to the definition of "COPYRIGHT MANAGEMENT
7 INFORMATION" to the extent it calls for a legal conclusion. Specifically, a determination of
8 whether any particular data, text, or metadata constitutes "Copyright Management Information"
9 under 17 U.S.C. § 1202(c) is inherently legal in nature and calls for a legal conclusion. Meta is not
10 in a position to know whether any particular information qualifies as legally protected Copyright
11 Management Information and a determination of such is not within Meta's possession, custody, or
12 control. Meta further objects to this definition as vague and ambiguous, overbroad, unduly
13 burdensome, and disproportionate to the needs of the case to the extent it includes identifying
14 information for persons that "created" copyrighted works.

15 2. Meta objects to the definition of "PLAINTIFFS' WORK(S)" as overbroad, unduly
16 burdensome and disproportionate to the needs of the case to the extent it puts the burden on Meta
17 to determine which works purportedly "belong" to PLAINTIFFS. Meta further objects to the term
18 "belong" as vague and ambiguous as it is unclear what form of possession or ownership is intended
19 by the use of this term. Without agreeing that PLAINTIFFS possess or own any valid copyright in
20 any specific works, Meta will interpret the term PLAINTIFFS' WORKS to refer to the specific
21 works identified in Exhibit A to the Interrogatories.

22 3. Meta objects to the definitions of "COMMUNICATIONS" and "DOCUMENT(S)"
23 to the extent these definitions are inconsistent with and otherwise seek to circumvent the custodian
24 and search term limits for electronic communications (including emails and other electronic
25 correspondence, and documents attached thereto), as provided in the forthcoming ESI Order.

26 4. Meta further objects to the definitions of "COMMUNICATIONS" and
27 "DOCUMENT(S)" to the extent they seek to expand or alter the scope of the Federal Rules of Civil
28 Procedure, the Local Rules of this Court, or the forthcoming ESI Order. Meta further objects to

1 these definitions to the extent they seek Meta to produce documents that are not reasonably
2 accessible because of undue burden or cost pursuant to Fed. R. Civ. P. 26(b)(2)(B), which are
3 unduly burdensome to preserve and search, or which otherwise, under the proportionality factors,
4 should not be preserved.

5 **5.** Meta objects to the definitions of “CORPORA” and “DATASET(S)” as overbroad,
6 unduly burdensome, and disproportionate to the needs of the case, including (but not limited to) the
7 extent they refer to non-textual materials that are not relevant to any party’s claims or defenses and
8 to the extent they refer vaguely to “other content.” Without any admission with respect to content
9 or nature, Meta will construe the term “DATASET(S)” to refer to Anna’s Archive, Bibliotik,
10 Books3, C4, Library Genesis (or LibGen), Sci-Hub, The Pile, and Z-Library.

11 **6.** Meta objects to the definition of “INFRINGE,” “INFRINGED,” and “INFRINGES”
12 to the extent it calls for a legal conclusion. Specifically, a determination of whether any conduct
13 constitutes copyright infringement is inherently legal in nature and calls for a legal conclusion.
14 Meta is not in a position to know whether any particular conduct infringes on a legally protected
15 work and a determination of such is not within Meta’s possession, custody, or control.

16 **7.** Meta objects to the definition of “LARGE LANGUAGE MODEL(S)” and “LLM
17 MODEL(S)” as vague and ambiguous, overbroad, unduly burdensome, and disproportionate to the
18 needs of the case. In particular, the phrase “any machine learning model, neural network,
19 generative artificial intelligence model, transformer model, or similar computational system trained
20 on large quantities of text or other data” is overly broad and encompasses tools and services that
21 are not relevant to any party’s claims or defenses. Meta further objects to this definition to the
22 extent that it purports to require Meta to produce documents or information concerning large
23 language models that were not publicly released and/or were not trained on corpuses of text that
24 allegedly include any of Plaintiffs’ allegedly copyrighted works. Meta further objects that the
25 phrase “process, predict, generate, summarize, classify, or otherwise manipulate natural language
26 or content” renders the definition vague, ambiguous, confusing, and overly broad. Meta will
27 construe “LARGE LANGUAGE MODEL(S)” and “LLM MODEL(S)” to mean the publicly
28 released Llama 1, Llama 2, Llama 3, Llama 4, and Muse Spark models.

1 **8.** Meta objects to the definition of “META,” “YOU,” and “YOUR” as overbroad,
2 unduly burdensome, and disproportionate to the needs of the case. Meta will construe “META,”
3 “YOU,” or “YOUR” to mean Meta Platforms, Inc.

4 **9.** Meta objects to the definition of “PIRATED,” “PIRACY,” and “PIRATED
5 MATERIAL” to the extent it calls for legal conclusions and assumes disputed issues. Meta further
6 objects that the definition is phrased in a way that is argumentative, prejudicial, and lacks
7 foundation. Meta is not in a position to know whether any particular work is subject to copyright
8 protection or whether third-party repositories lacked authorization to host or possess such works.

9 **10.** Meta objects to the definition of “SHADOW LIBRARY” and “SHADOW
10 LIBRARIES” to the extent it calls for legal conclusions and assumes disputed issues. Meta further
11 objects that the definition is phrased in a way that is argumentative, prejudicial, and lacks
12 foundation. Meta further objects to this definition as overbroad, unduly burdensome, and
13 disproportionate to the needs of the case, including (but not limited to) the extent it refers to non-
14 textual materials that are not relevant to any party’s claims or defenses and to the extent it refers
15 vaguely to “media and similar materials.” Meta is not in a position to know whether any particular
16 work is subject to copyright protection or whether third-party repositories lacked authorization to
17 host or possess such works. Meta further objects to this definition to the extent that it incorporates
18 the objectionable portions of the term “DATASETS.” Without any admission with respect to
19 content or nature, Meta will construe the term “SHADOW LIBRARY” to refer to certain of the
20 third-party datasets identified by Plaintiffs, namely Anna’s Archive, Bibliotik, Books3, Library
21 Genesis (or LibGen), Sci-Hub, The Pile, and Z-Library.

22 **11.** Meta objects to the definition of “WEB SCRAPING” as vague, ambiguous,
23 overbroad, unduly burdensome, and disproportionate to the needs of the case. In particular, the
24 extensive list of undefined terms, including “extraction, collection, copying, downloading,
25 crawling, indexing, harvesting, or retrieval” and “aggregation, storage, processing” are susceptible
26 to multiple definitions, rendering this definition unintelligibly ambiguous. Meta further objects to
27 the phrase “images, metadata, or other content” as overbroad and disproportionate to the needs of
28 the case, to the extent it refers to training data other than text data that is not relevant to any party’s

1 claims or defenses. Meta further objects to this definition to the extent that it incorporates the
2 objectionable portions of the terms “SHADOW LIBRARIES” and “LARGE LANGUAGE
3 MODELS.” Meta will construe “WEB SCRAPING” to mean the automated collection of text data
4 from the public internet for use in training the Meta Language Models (as construed above).

5 **III. General Objections**

6 Meta hereby incorporates the following general objections into each of its specific
7 responses and objections to the individual Interrogatories as if fully set forth therein:

8 **1.** Meta incorporates by reference each and every General Objection set forth below
9 into each and every specific Response. From time to time, a specific Response may repeat a
10 General Objection for emphasis or some other reason. The failure to repeat any General Objection
11 in any specific Response shall not be interpreted as a waiver of any General Objection to that
12 Response.

13 **2.** Any information provided in response to any individual Interrogatory is made
14 without waiver of, and subject to, the General Objections and any additional objections asserted in
15 response to that specific Interrogatory.

16 **3.** Meta objects to the Interrogatories to the extent that they impose any differing or
17 additional obligations from those required by the Federal Rules, the Local Rules, or any other
18 applicable rule, law, or doctrine, the forthcoming ESI Order and the Protective Order entered in
19 this action (the “Applicable Laws, Rules, and Agreements”), on the ground that such a requirement
20 exceeds the scope of permissible discovery and attempts to impose an unreasonable burden and
21 expense on Meta. To the extent any Interrogatory conflicts with, or purports to impose additional
22 or different duties and obligations, Meta will respond in accordance with the Applicable Laws,
23 Rules, and Agreements.

24 **4.** Meta objects to the Interrogatories to the extent that they are overly broad, vague,
25 ambiguous, and unduly burdensome; or seek documents and information that are neither relevant
26 nor proportional to the needs of this action.

27 **5.** Meta objects to the Interrogatories to the extent they seek information or documents
28 or seek to impose a search for information or documents: (a) not within Meta’s possession, custody,

1 or control; (b) not maintained by Meta in the normal course of business; (c) already in the
2 possession, custody, or control of Plaintiffs; (d) readily available through public sources or from
3 sources that are more convenient, less burdensome, or less expensive; or (e) from sources that are
4 more readily available to Plaintiffs than to Meta. Meta further objects to the extent the burden or
5 expense of the proposed discovery outweighs its likely benefit.

6 **6.** Meta objects to the Interrogatories to the extent that they seek documents and
7 information protected from disclosure by privileges and other protections from production,
8 including, without limitation: (a) the attorney-client privilege; (b) the work-product doctrine; or (c)
9 any other constitutional, statutory, common law or regulatory protection, immunity, or proscription
10 from disclosure. In responding to the Interrogatories, Meta will not produce information or
11 documents protected by such privileges. Where Meta withholds information under claim of
12 privilege, Meta will adhere to the requirements under the forthcoming ESI Order. Meta does not
13 intend the inadvertent production of any privileged or protected information to constitute a waiver
14 of Meta's rights to assert any applicable privilege or protection, and Meta further reserves the right
15 to demand that Plaintiffs return, destroy, or sequester any privileged or protected documents
16 inadvertently produced and all copies thereof consistent with Fed. R. Civ. P. 26(b)(5)(B) and the
17 terms and conditions of the forthcoming ESI Order and the Protective Order entered in this action.

18 **7.** Meta objects to the Interrogatories to the extent that they purport to require Meta to
19 provide information or documents in violation of a legal, contractual, or other obligation of
20 nondisclosure owed to a third party. Meta will not provide information or documents subject to
21 any such obligation unless and until it receives the necessary consent from any such third party or,
22 in the absence of such consent, unless and until it is ordered to do so by a court of competent
23 jurisdiction.

24 **8.** Meta objects to the Interrogatories to the extent they call for, or can be interpreted
25 as calling for, Meta to make legal conclusions, or to the extent they assume disputed issues or are
26 phrased in such a way as to be lacking foundation, argumentative, prejudicial, or otherwise
27 improper.

28 **9.** Meta objects to the Interrogatories to the extent that they seek confidential, trade

1 secret, competitively sensitive, business, financial, or other proprietary information. To the extent
 2 documents or information containing any such information are nonprivileged, responsive to the
 3 Interrogatories, and are not otherwise objectionable, Meta will only produce such documents and
 4 information subject to the forthcoming ESI Order and the Protective Order entered in this
 5 action. Meta further reserves the right to redact or otherwise withhold any confidential, proprietary,
 6 trade secret, or competitively sensitive information that is neither relevant nor proportional to the
 7 needs of this action.

8 **10.** Meta objects to the Interrogatories to the extent they seek documents that are not
 9 proportionate to the needs of the case and/or not relevant to any party's claims or defenses.

10 **11.** Meta objects to the Interrogatories that seek to impose an obligation to investigate
 11 or discover information or materials from third parties or sources that are equally accessible to
 12 Plaintiffs as duplicative, overbroad, unduly burdensome, and oppressive.

13 **12.** Meta reserves the right to assert additional objections, or to supplement its
 14 Responses as appropriate, particularly if any additional information regarding the Interrogatories
 15 or the underlying claims at issue is provided.

16 **IV. OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES**

17 **INTERROGATORY NO. 1:**

18 Which PLAINTIFFS' WORKS did YOU obtain from a SHADOW LIBRARY?

19 **RESPONSE TO INTERROGATORY NO. 1:**

20 Meta incorporates by reference its objections and definitions above, including to the terms
 21 PLAINTIFFS' WORKS, YOU, and SHADOW LIBRARY.

22 Subject to and without waiving the foregoing objections, Meta is undertaking a reasonable
 23 investigation to identify which PLAINTIFFS' WORKS, if any, Meta downloaded as part of Anna's
 24 Archive, Books3 and LibGen for use in training Meta's LARGE LANGUAGE MODELS. As
 25 previously communicated to counsel for PLAINTIFFS, Meta may need additional information,
 26 including the text of the PLAINTIFFS' WORKS, in order to provide a more complete response to
 27 this Interrogatory. Meta will supplement this response on a rolling basis as it identifies responsive
 28 information.

INTERROGATORY NO. 2:

Identify each PLAINTIFFS' WORK that YOU obtained through WEB SCRAPING.

RESPONSE TO INTERROGATORY NO. 2:

Meta incorporates by reference its objections and definitions above, including to the terms PLAINTIFFS' WORK, YOU, and WEB SCRAPING.

Subject to and without waiving the foregoing objections, Meta is undertaking a reasonable investigation to identify which PLAINTIFFS' WORKS, if any, Meta downloaded as part of any web archiving activity conducted by Meta's SpiderMate web archiver for use in training Meta's LARGE LANGUAGE MODELS. As previously communicated to counsel for PLAINTIFFS, Meta may need additional information, including the text of the PLAINTIFFS' WORKS, in order to provide a more complete response to this Interrogatory. Meta will supplement this response on a rolling basis as it identifies responsive information.

INTERROGATORY NO. 3:

For each PLAINTIFFS' WORK that YOU obtained from a SHADOW LIBRARY or through WEB SCRAPING, when and how did you obtain it? Identify and describe each instance in detail, including the source or sources, date or dates of acquisition, and means or method of acquisition.

RESPONSE TO INTERROGATORY NO. 3:

Meta incorporates by reference its objections and definitions above, including to the terms PLAINTIFFS' WORK, YOU, SHADOW LIBRARY, and WEB SCRAPING.

Meta objects to this request to the extent it is duplicative of information sought by Interrogatory Nos. 1 and 2. Meta further objects to this interrogatory as vague, ambiguous, overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent the phrase "[i]dentify and describe each instance in detail, including" seeks unspecified information beyond the recited request for "the source or sources, date or dates of acquisition, and means or method of acquisition" of data obtained from a SHADOW LIBRARY or WEB SCRAPING.

Subject to and without waiving the foregoing objections, as stated for Interrogatory Nos. 1 and 2, Meta is undertaking a reasonable investigation to identify which PLAINTIFFS' WORKS, if any (1) Meta downloaded as part of Anna's Archive, Books3, and/or LibGen for use in training

1 Meta's LARGE LANGUAGE MODELS and (2) Meta downloaded as part of any web archiving
2 activity conducted by Meta's SpiderMate web archiver for use in training Meta's LARGE
3 LANGUAGE MODELS. Meta will provide reasonably available information regarding the source,
4 timing, and method of download. As previously communicated to counsel for PLAINTIFFS, Meta
5 may need additional information, including the text of the PLAINTIFFS' WORKS, in order to
6 provide a more complete response to this Interrogatory. Meta will supplement this response on a
7 rolling basis as it identifies responsive information.

8 **INTERROGATORY NO. 4:**

9 Which PLAINTIFFS' WORKS did YOU use, in whole or in part, to train any of YOUR LLM
10 MODELS?

11 **RESPONSE TO INTERROGATORY NO. 4:**

12 Meta incorporates by reference its objections and definitions above, including to the terms
13 PLAINTIFFS' WORKS, YOU, and YOUR LLM MODELS.

14 Meta further objects to this interrogatory to the term "train" as vague and ambiguous to the
15 extent it is undefined. Meta will interpret the term "train" as the act of pre-training and/or fine-
16 tuning a large language model.

17 Subject to and without waiving the foregoing objections, Meta is undertaking a reasonable
18 investigation to identify which PLAINTIFFS' WORKS, if any, were used to pre-train Meta's LLM
19 MODELS. As previously communicated to counsel for PLAINTIFFS, Meta may need additional
20 information, including the text of the PLAINTIFFS' WORKS, in order to provide a more complete
21 response to this Interrogatory. Meta will supplement this response on a rolling basis as it identifies
22 responsive information.

23 **INTERROGATORY NO. 5:**

24 For each PLAINTIFFS' WORK that YOU used, in whole or in part, to train any of YOUR
25 LLM MODELS, when and how did you do so? IDENTIFY and describe each instance in detail.

26 **RESPONSE TO INTERROGATORY NO. 5:**

27 Meta incorporates by reference its objections and definitions above, including to the terms
28 PLAINTIFFS' WORKS, YOU, and YOUR LLM MODELS.

Meta further objects to this interrogatory to the term “train” as vague and ambiguous to the extent it is undefined. Meta will interpret the term “train” as the act of pre-training and/or fine-tuning a large language model. Meta further objects to the phrase “how did you do so?” as it does not specify which actions the interrogatory seeks information about. Meta will interpret the phrase “how did you do so?” as seeking a high-level general description of the way a work like a PLAINTIFFS’ WORK would be used in the pre-training process of Meta’s LLM MODELS. Meta further objects to this interrogatory as vague, ambiguous, overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent the phrase “[i]dentify and describe each instance in detail” seeks unspecified information about the use of PLAINTIFFS’ WORKS in pre-training. Meta will interpret this phrase to seek a high-level general description of the way a work like a PLAINTIFFS’ WORK would be used in the pre-training process of Meta’s LLM MODELS.

Subject to and without waiving the foregoing objections, as stated for Interrogatory No. 4, Meta is undertaking a reasonable investigation to identify which PLAINTIFFS’ WORKS, if any, that were used to pre-train Meta’s LLM MODELS and Meta will provide a high-level general description of the way a work like a PLAINTIFFS’ WORK would be used in the pre-training process of Meta’s LLM MODELS. As previously communicated to counsel for PLAINTIFFS, Meta may need additional information, including the text of the PLAINTIFFS’ WORKS, in order to provide a more complete response to this Interrogatory. Meta will supplement this response on a rolling basis as it identifies responsive information.

INTERROGATORY NO. 6:

IDENTIFY each PLAINTIFFS’ WORK from which YOU removed or altered any COPYRIGHT MANAGEMENT INFORMATION.

RESPONSE TO INTERROGATORY NO. 6:

Meta incorporates by reference its objections and definitions above, including to the terms PLAINTIFFS’ WORKS, YOU, and COPYRIGHT MANAGEMENT INFORMATION.

Meta further objects to this interrogatory as overbroad, unduly burdensome, and disproportionate to the needs of the case to the extent it seeks information about PLAINTIFFS’ WORKS that were not used as part of Meta’s pre-training of large language models.

1 Subject to and without waiving the foregoing objections, Meta is undertaking a reasonable
2 investigation to identify for which PLAINTIFFS' WORKS identified in its responses to
3 Interrogatory Nos. 1 and 2 Meta is able to reasonably determine that COPYRIGHT
4 MANAGEMENT INFORMATION was removed or altered by Meta. As previously
5 communicated to counsel for PLAINTIFFS, Meta may need additional information, including the
6 text of the PLAINTIFFS' WORKS, in order to provide a more complete response to this
7 Interrogatory. Meta will supplement this response on a rolling basis as it identifies responsive
8 information.

9 **INTERROGATORY NO. 7:**

10 Explain what you did with each PLAINTIFFS' WORK that YOU obtained from a SHADOW
11 LIBRARY or through WEB SCRAPING or that YOU used, in whole or in part, to train any of
12 YOUR LLM MODELS. For each PLAINTIFFS' WORK, your explanation should state whether,
13 when, and how it was:

- 14 (a) retained, stored, or preserved;
 - 15 (b) ingested;
 - 16 (c) processed;
 - 17 (d) tokenized;
 - 18 (e) duplicated or reproduced;
 - 19 (f) de-duplicated;
 - 20 (g) stripped of COPYRIGHT MANAGEMENT INFORMATION;
 - 21 (h) modified or altered in any other way;
 - 22 (i) distributed;
 - 23 (j) torrented;
 - 24 (k) incorporated, in whole or in part, into any of YOUR LLM MODELS or model
25 parameters; or
 - 26 (l) deleted.
- 27
28

RESPONSE TO INTERROGATORY NO. 7:

Meta incorporates by reference its objections and definitions above, including to the terms PLAINTIFFS' WORKS, SHADOW LIBRARY, WEB SCRAPING, COPYRIGHT MANAGEMENT INFORMATION, YOU, and YOUR LLM MODELS.

Meta further objects to this interrogatory as compound because it comprises at least twelve subparts and would potentially exceed the allowable number of interrogatories under the Federal Rules of Civil Procedure. Meta further objects to the terms "[e]xplain what you did", "processed", "tokenized", "stripped", "modified or altered in any other way", "incorporated, in whole or in part, into any of YOUR LLM MODELS or model parameters" as vague and ambiguous. Meta further objects to this interrogatory to the extent it seeks information sought by Interrogatory Nos. 1-6. Meta further objects to this interrogatory to the extent it requires Meta to create or re-create information or data that is not in Meta's possession, custody, or control.

Subject to and without waiving the foregoing objections, as stated for Interrogatory Nos. 1-6, Meta is undertaking a reasonable investigation to identify which PLAINTIFFS' WORKS, if any, were downloaded and used to pre-train Meta's LLM MODELS. Meta will provide a high-level general description of the way a work like a PLAINTIFFS' WORK would be utilized by Meta in conjunction with Meta's LLM MODELS. As previously communicated to counsel for PLAINTIFFS, Meta may need additional information, including the text of the PLAINTIFFS' WORKS, in order to provide a more complete response to this Interrogatory. Meta will supplement this response on a rolling basis as it identifies responsive information.

INTERROGATORY NO. 8:

For each response to every Request for Admission served on YOU by Plaintiffs in this case that is not an unqualified admission, IDENTIFY the following information:

- (a) The number of the Request for Admission;
- (b) All facts on which YOU base your response;
- (c) All PERSONS who have knowledge of those facts; and
- (d) All DOCUMENTS that support YOUR response along with the custodian of those DOCUMENTS.

1 RESPONSE TO INTERROGATORY NO. 8:

2 Meta incorporates by reference its objections and definitions above, including to the terms
 3 YOU and DOCUMENTS.

4 Meta further objects to this interrogatory as compound because it comprises multiple
 5 subparts and would potentially exceed the allowable number of interrogatories under the Federal
 6 Rules of Civil Procedure. Meta will respond to this interrogatory to the extent required by Local
 7 Rule 33-2 and 36-2.

8 Meta is willing to meet and confer regarding the appropriate scope, if any, of a response to
 9 this interrogatory.

10 Dated: June 26, 2026

COOLEY LLP

13 By: /s/ Phillip E. Morton

Phillip E. Morton

14 Karen L. Dunn (*pro hac vice*)
 15 Jessica E. Phillips (*pro hac vice*)
 16 Kyle N. Smith (*pro hac vice*)
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CERTIFICATE OF SERVICE

I am a citizen of the United States and a resident of Washington, D.C. I am employed in Washington, D.C. I am over the age of eighteen years, and not a party to the within action. My business address is Dunn Isaacson Rhee LLP, 401 Ninth Street NW, Washington, D.C. 20004. On the date set forth below I served the documents described below in the manner described below:

**DEFENDANT META PLATFORMS, INC.'S RESPONSES AND OBJECTIONS TO
PLAINTIFFS' FIRST SET OF INTERROGATORIES [NOS. 1-8]**

☒ (BY ELECTRONIC MAIL) I am personally and readily familiar with the business practice of Dunn Isaacson Rhee LLP for the preparation and processing of documents in portable document format (PDF) for e-mailing, and I caused said documents to be prepared in PDF and then served by electronic mail to the parties listed below.

on the following part(ies) in this action:

FREEDMAN NORMAND FRIEDLAND LLP	STRIS & MAHER LLP
Kyle Roche (<i>pro hac vice</i>)	Elizabeth Brannen (# 226234)
Devin (Velvel) Freedman (<i>pro hac vice</i>)	John Stokes (# 310847)
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Executed on June 26, 2026, at Washington, D.C.

/s/ Jenifer N. Hartley
Jenifer N. Hartley