

EXHIBIT P

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Attorneys for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHICKEN SOUP FOR THE SOUL, LLC,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
PLAINTIFF CHICKEN SOUP FOR
THE SOUL, LLC**

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF CHICKEN SOUP FOR THE SOUL, LLC

SET NUMBER: ONE (1)

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Chicken Soup for the Soul, LLC (“Chicken Soup” or “Plaintiff”) produce the following documents and things within thirty (30) days of service of this First Set of Requests for Production (“Requests”) at the offices of Dunn Isaacson Rhee LLP, 401 9th Street NW, Washington, D.C. 20004 or via an electronic production (e.g. FTP transfer, LiquidFiles, or another mutually agreeable means).

DEFINITIONS

The following terms shall have the following definitions and meanings, regardless of capitalization, unless another definition or meaning clearly appears from the context in which the term is used:

1. YOU, YOUR, or YOURS mean Plaintiff Chicken Soup and all its parents, subsidiaries, predecessors, successors, divisions, imprints, and all officers, directors, employees, agents, attorneys, and other persons acting or purporting to act on its behalf.

2. ACTION means the lawsuit titled *Chicken Soup for the Soul, LLC v. Meta Platforms, Inc.*, Case No. 3:26-cv-02333-VC (N.D. Cal.).

3. COMPLAINT means the operative complaint against Meta in the ACTION.

4. ASSERTED WORKS means the literary works that YOU have alleged in the ACTION and/or COMPLAINT that Meta has allegedly infringed.

5. GENERATIVE AI TOOL means any artificial intelligence system capable of producing text, images, audio, video, or other audiovisual content (e.g., large language models and diffusion models), including but not limited to ChatGPT, Gemini, Claude, Meta.AI, and Llama—including any and all versions or models thereof—and any internal or proprietary system, tool, or platform with any such capabilities.

1 6. REGISTRATION MATERIALS means applications, certificates, deposits,
2 correspondence, continuations, amendments, and communications with the U.S. Copyright Office
3 for any ASSERTED WORK.

4 7. CMI means Copyright Management Information as defined in 17 U.S.C. § 1202(c).

5 8. LLM means a generative artificial intelligence (“AI”) large language model.

6 9. META AI MODELS means any Meta generative AI models (e.g., Meta.AI, Llama)
7 that are the subject of YOUR COMPLAINT.

8 10. PERSON means any natural person or any business, legal, or governmental entity
9 or association or any other cognizable entity, including, without limitation, corporations,
10 proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations,
11 governmental agencies or instrumentalities, societies, and orders.

12 11. READABLE means a copy of a work that is in a form that can be perceived,
13 understood, or interpreted by humans.

14 12. THIRD PARTY means all PERSONS other than the named Parties to this ACTION.

15 13. TORRENTING is used in the same sense as it is used in the COMPLAINT and
16 means a method of downloading and sharing files directly between users (peer-to-peer, or P2P)
17 over the internet, rather than downloading from a single, central server.

18 14. COMMUNICATION(S) is used in its broadest sense and means any transmission
19 of information from one PERSON or entity to another by any means, including without limitation
20 DOCUMENTS consisting of or containing written communications, telephone communications, in
21 person communications, email, texts, Slack, social media posts or messages, instant messaging, and
22 any other electronic communications.

23 15. DOCUMENT(S) means the original and all non-identical copies (including drafts
24 and those with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as
25 defined in Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil
26 Procedure 34, and includes papers of all kinds and electronically stored information, including by
27 way of example and without limitation, electronic mail, letters, communications, memoranda,
28 notes, computer generated data, calendars, records, minutes, studies, reports, notebooks, messages,

1 telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written
2 notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data,
3 source code, data compilation, pictures, photographs, books, pamphlets, publications,
4 advertisements, sales literature, brochures, manuals, price lists, announcements, and any other
5 writings, records, or tangible objects produced or reproduced mechanically, electrically,
6 electronically, photographically, or chemically. The term also includes any parent or child
7 attachment or other documents embedded or linked in any way to a requested DOCUMENT. For
8 the avoidance of doubt, DOCUMENTS includes COMMUNICATIONS.

9 16. CONCERNING or REFERRING or RELATING or REFLECTING are used
10 interchangeably, shall be construed in the broadest possible manner, and shall mean constituting,
11 relating to, reflecting, regarding, memorializing, identifying, embodying, referring to, pertaining
12 to, commenting on, discussing, analyzing, considering, describing, containing, consisting of,
13 connected to, indicating, evidencing, supporting, or refuting.

14 **INSTRUCTIONS**

15 1. Wherever used herein: the singular shall include the plural and vice versa; verb
16 tenses shall be interpreted to include past, present, and future tenses; the word “all” includes the
17 word “any” and vice versa; and the terms “and” and “or” shall be construed either disjunctively or
18 conjunctively as necessary to bring within the scope of these Requests any DOCUMENTS that
19 might otherwise be construed to be outside their scope.

20 2. Wherever used herein, the term “including” shall be construed as including, but not
21 limited to, the referenced item(s), matter(s), or subject(s).

22 3. YOU must produce all DOCUMENTS in YOUR possession, custody, or control,
23 wherever located.

24 4. Each DOCUMENT must be produced as it is kept in the usual course of business,
25 including all file folders, binders, notebooks, data sharing systems and other devices by which such
26 papers, data, information or things may be organized, separated or stored. For example, a
27 DOCUMENT or thing that is part of a file, docket or other grouping should be physically produced
28

1 together with all other DOCUMENTS from said file, docket, or grouping, in the same order or
2 manner of arrangement.

3 5. DOCUMENTS should be produced in a form pursuant to a production protocol to
4 be agreed upon by the parties, in a form in which they are ordinarily maintained (e.g., native form),
5 or in a reasonably usable form (e.g., TIFF images with Relativity-compatible load files).

6 6. If any of the Requests cannot be responded to in full after exercising due diligence
7 to secure the information, respond to the extent possible, specifying YOUR inability to respond to
8 the remainder and stating whatever information YOU have concerning the unanswered portions.

9 7. If YOU object to all or any portion of a particular Request: (i) produce all
10 DOCUMENTS within the scope of the Request to which YOU do not object; and (ii) describe
11 whether—and to what extent—YOU have limited YOUR production of DOCUMENTS as a result
12 of YOUR objection(s).

13 8. If any DOCUMENT responsive to these Requests is withheld under a claim of
14 privilege, YOU must promptly comply with the requirements of Federal Rule of Civil Procedure
15 26(b)(5) and any other operative agreement between the parties as to each DOCUMENT for which
16 a claim of privilege or protection from discovery is made.

17 9. When a DOCUMENT contains both privileged and non-privileged material, the
18 non-privileged material must be disclosed to the fullest extent possible without disclosing the
19 privileged material. If a privilege is asserted with regard to part of the material contained in a
20 DOCUMENT, the party claiming the privilege must clearly indicate the portions as to which the
21 privilege is claimed. When a DOCUMENT has been redacted or altered in any fashion, YOU shall
22 identify as to each DOCUMENT the reason for the redaction or alteration, the date of the redaction
23 or alteration, and the individual performing the redaction or alteration. Any redaction must be
24 clearly visible on the redacted DOCUMENT.

25 10. If DOCUMENTS that fall within the scope of a Request were lost or destroyed after
26 this ACTION was filed: (i) describe the DOCUMENTS (type, subject matter, etc.) that have been
27 lost or destroyed; and (ii) explain the circumstances relating to the loss or destruction of such
28 DOCUMENTS.

11. If YOU have no DOCUMENTS that fall within the scope of a Request, please so state in YOUR written response thereto.

12. These Requests are continuing in nature and YOUR responses to them are to be promptly supplemented or amended if, after the time of YOUR initial responses, YOU learn that any response is or has become in some material respect incomplete or incorrect, pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1

DOCUMENTS sufficient to show the REGISTRATION MATERIALS for each ASSERTED WORK, including but not limited to applications, deposits, certificates, and correspondence with the Copyright Office.

REQUEST FOR PRODUCTION NO. 2

DOCUMENTS sufficient to show any previous registration, new material included, or limitations identified in the REGISTRATION MATERIALS for any ASSERTED WORK, including, but not limited to, DOCUMENTS sufficient to show the extent of any new (as opposed to pre-existing) material in a particular edition of an ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 3

DOCUMENTS sufficient to show the chain of title for each ASSERTED WORK, including but not limited to any assignments and amendments thereto.

REQUEST FOR PRODUCTION NO. 4

DOCUMENTS sufficient to identify each PERSON who contributed written material to each ASSERTED WORK and the extent of their contributions.

REQUEST FOR PRODUCTION NO. 5

For each of the ASSERTED WORKS that is not a work made for hire (as that term is used and defined in 17 U.S.C. § 101), DOCUMENTS sufficient to show the basis for YOUR assertion of rights in the work, including, but not limited to, any agreement(s) or correspondence with the author of the work.

REQUEST FOR PRODUCTION NO. 6

DOCUMENTS sufficient to identify each literary work (by title and author) that YOU and/or any THIRD PARTY authors of the ASSERTED WORKS purchased, acquired, borrowed, referenced, or reviewed for purposes of researching, writing, or editing the ASSERTED WORKS, whether or not such works are identified as reference material in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 7

All DOCUMENTS CONCERNING any requests by YOU and/or any THIRD PARTY authors of the ASSERTED WORKS for permission to quote, reference, or otherwise use works written by THIRD PARTIES in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 8

All DOCUMENTS CONCERNING any licenses YOU have acquired to quote, reference, or otherwise use works written by THIRD PARTIES in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 9

All DOCUMENTS CONCERNING any complaints or allegations by THIRD PARTIES of plagiarism or copyright infringement in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 10

DOCUMENTS sufficient to show any written materials used in preparation of the ASSERTED WORKS, including notes and outlines.

REQUEST FOR PRODUCTION NO. 11

DOCUMENTS sufficient to identify any THIRD PARTY written materials relied upon or used as inspiration during the creation of any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 12

All DOCUMENTS between YOU and any PERSON CONCERNING any actual or potential claims against Meta, including direct COMMUNICATIONS, interviews, statements to the press, and social media posts.

REQUEST FOR PRODUCTION NO. 13

All DOCUMENTS between YOU and any PERSON CONCERNING actual or potential claims against developers of LLMs other than Meta, including direct COMMUNICATIONS, interviews, statements to the press, and social media posts.

REQUEST FOR PRODUCTION NO. 14

All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about Meta.

REQUEST FOR PRODUCTION NO. 15

All COMMUNICATIONS between YOU and any PERSONS who contributed written material to the ASSERTED WORKS, CONCERNING this ACTION.

REQUEST FOR PRODUCTION NO. 16

DOCUMENTS sufficient to show all Board of Directors minutes, presentations, or executive-level briefings CONCERNING this ACTION.

REQUEST FOR PRODUCTION NO. 17

All DOCUMENTS produced or provided to YOU by THIRD PARTIES RELATING TO this ACTION.

REQUEST FOR PRODUCTION NO. 18

All DOCUMENTS REFLECTING when and how YOU first became aware of Meta's alleged infringement of each of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 19

All DOCUMENTS REFLECTING when and how YOU first became aware of the alleged infringement of the ASSERTED WORKS by THIRD PARTY developers of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 20

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding Meta's alleged infringement of one or more of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 21

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding alleged infringement of one or more of the ASSERTED WORKS by THIRD PARTY developers of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 22

All of YOUR COMMUNICATIONS with any THIRD PARTY CONCERNING META AI MODELS.

REQUEST FOR PRODUCTION NO. 23

All DOCUMENTS CONCERNING YOUR allegations that Meta distributed any ASSERTED WORK, including but not limited to via TORRENTING or other peer-to-peer protocols, including any technical analyses and network logs.

REQUEST FOR PRODUCTION NO. 24

All DOCUMENTS CONCERNING YOUR allegations that Meta “induced” or “materially contributed” to THIRD PARTY infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 25

DOCUMENTS sufficient to show all Board of Directors minutes, presentations, or executive-level briefings CONCERNING GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 26

DOCUMENTS sufficient to show YOUR policies, guidelines, standards, instructions, or directives (formal or informal) CONCERNING the use of GENERATIVE AI TOOLS by employees, contractors, or other PERSONS working at YOUR direction or on YOUR behalf.

REQUEST FOR PRODUCTION NO. 27

DOCUMENTS sufficient to show any GENERATIVE AI TOOLS that YOU have used, or that have been used on YOUR behalf, including, as applicable, the account username(s) for each such tool and the date the account was created.

REQUEST FOR PRODUCTION NO. 28

All DOCUMENTS CONCERNING any instances in which YOU approved the use of META AI MODELS by YOUR employees or contractors.

REQUEST FOR PRODUCTION NO. 29

DOCUMENTS sufficient to show any GENERATIVE AI TOOL tested or evaluated by YOU for use by YOUR employees or contractors, including, but not limited to, vendor contracts, non-disclosure agreements (NDAs), statements of work, or research reports or analyses.

REQUEST FOR PRODUCTION NO. 30

DOCUMENTS sufficient to show all business plans, analyses, assessments, roadmaps, research reports, or other studies CONCERNING YOUR actual or proposed development or training of any GENERATIVE AI TOOL.

REQUEST FOR PRODUCTION NO. 31

DOCUMENTS sufficient to show YOUR development, training, or contemplated development or training of any GENERATIVE AI TOOL, including training datasets, data sources, or model weights.

REQUEST FOR PRODUCTION NO. 32

DOCUMENTS sufficient to show all GENERATIVE AI TOOLS incorporated into any offering provided to YOU, including, but not limited to, AI ad generators.

REQUEST FOR PRODUCTION NO. 33

DOCUMENTS sufficient to show all business plans, analyses, assessments, roadmaps, research reports, or other studies CONCERNING YOUR incorporation of any GENERATIVE AI TOOLS into any offering provided by YOU.

REQUEST FOR PRODUCTION NO. 34

Copies of YOUR billing statements REFLECTING the amount YOU have paid for YOUR use of any LLM.

REQUEST FOR PRODUCTION NO. 35

DOCUMENTS sufficient to show any articles, blog posts, books, or other written works published by YOU that instruct on, promote, and/or otherwise condone the use of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 36

Copies of any articles, blog posts, books, or other written works published by YOU or otherwise displayed on YOUR website that were created using GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 37

DOCUMENTS sufficient to show articles, books, or other written works that YOU claim ownership of other than ASSERTED WORKS, and for which the subject matter is the same as or substantively equivalent to one or more of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 38

DOCUMENTS sufficient to show all of the ways in which YOU have monetized the ASSERTED WORKS, including but not limited to direct sales, subscriptions, and bundling.

REQUEST FOR PRODUCTION NO. 39

For each ASSERTED WORK, DOCUMENTS sufficient to show where and how one can download, read, or otherwise purchase the work.

REQUEST FOR PRODUCTION NO. 40

DOCUMENTS sufficient to show, between January 1, 2015, and the present, weekly sales volume and corresponding revenue, costs, and profits corresponding to the ASSERTED WORKS and separated by edition (e.g. hardcover, softcover) and channel (e.g., digital, print, etc.).

REQUEST FOR PRODUCTION NO. 41

DOCUMENTS sufficient to show, between January 1, 2015, and the present, monthly revenue, profit, and costs corresponding to any licensing of any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 42

DOCUMENTS sufficient to show, between January 1, 2015, and the present, monthly revenue, profit, and costs corresponding to any subscriptions that incorporate access to any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 43

For each of YOUR ASSERTED WORKS that is available via Kindle Unlimited or any other online subscriptions, DOCUMENTS sufficient to show, on a monthly basis, the number of readers for each work between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 44

For each of YOUR ASSERTED WORKS that is available via Kindle Unlimited or other online subscriptions, DOCUMENTS sufficient to show, on a monthly basis, Kindle Edition Normalized Pages tracking data between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 45

To the extent that YOU have made an ASSERTED WORK available to read on YOUR website or any website controlled by YOU (whether for a fee or for free), DOCUMENTS sufficient to show the number of daily visitors to the webpage containing the ASSERTED WORK between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 46

DOCUMENTS sufficient to show, on a monthly basis, the number of subscribers to any magazine published by YOU that has incorporated one or more ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 47

All DOCUMENTS CONCERNING any efforts by YOU on or after January 1, 2021, to make any of the ASSERTED WORKS, or portions thereof, available on the internet for free.

REQUEST FOR PRODUCTION NO. 48

DOCUMENTS sufficient to identify each instance on or after January 1, 2021, in which YOU provided free copies of any of the ASSERTED WORKS to THIRD PARTIES for purposes of soliciting reviews, commentary, criticism, endorsements, or summaries.

REQUEST FOR PRODUCTION NO. 49

DOCUMENTS sufficient to show any business plan, go-to-market plan, market analysis, study, assessment, or forecast, for each ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 50

DOCUMENTS sufficient to show any assessment or analysis of YOUR competition and/or competitors for the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 51

DOCUMENTS sufficient to show any studies, surveys, reports, or analyses RELATING to YOUR marketing or sales of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 52

DOCUMENTS sufficient to show YOUR revenues or consideration received for the promotion of GENERATIVE AI TOOLS on YOUR website.

REQUEST FOR PRODUCTION No. 53

All DOCUMENTS CONCERNING the injury or other harm that YOU allegedly suffered due to Meta's alleged infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 54

DOCUMENTS sufficient to show any valuations of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 55

All DOCUMENTS evidencing a market for sale or license of YOUR ASSERTED WORKS, or derivations thereof, for purposes of training GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION No. 56

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to Meta's economic impact on YOUR business.

REQUEST FOR PRODUCTION No. 57

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to Meta's economic impact on YOUR ASSERTED WORKS and/or any markets for YOUR ASSERTED WORKS or derivations of the ASSERTED WORKS, including but not limited to any licensing or product markets.

REQUEST FOR PRODUCTION No. 58

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to any GENERATIVE AI TOOL'S economic impact on YOUR business.

REQUEST FOR PRODUCTION No. 59

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to any GENERATIVE AI TOOL'S economic impact on the ASSERTED WORKS and/or any markets for the ASSERTED WORKS or derivations of the ASSERTED WORKS, including but not limited to any licensing or product markets.

REQUEST FOR PRODUCTION NO. 60

All DOCUMENTS that YOU may offer, use, or rely on to support any contention that there is a market for licensing the ASSERTED WORKS to train any LLM, including DOCUMENTS sufficient to identify that market, when and how it first developed, and the PERSONS involved, and any DOCUMENTS RELATING to the licensing or use of the ASSERTED WORKS in such market(s).

REQUEST FOR PRODUCTION NO. 61

All DOCUMENTS upon which YOU will rely to support any contention that Meta's use of the ASSERTED WORKS to train an LLM caused harm to any market for those works.

REQUEST FOR PRODUCTION NO. 62

All DOCUMENTS that YOU may offer, use, or rely on to support any contention that Meta's use of the ASSERTED WORKS to train any LLM was not a fair use under 17 U.S.C. § 107.

REQUEST FOR PRODUCTION NO. 63

DOCUMENTS sufficient to show any licensing, permissions, or consents given by YOU or on YOUR behalf to THIRD PARTIES CONCERNING the ASSERTED WORKS on or after January 1, 2015.

REQUEST FOR PRODUCTION NO. 64

DOCUMENTS sufficient to show prospective licensing opportunities for the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 65

All DOCUMENTS CONCERNING actual or prospective licensing of the ASSERTED WORKS to train a GENERATIVE AI TOOL.

REQUEST FOR PRODUCTION NO. 66

DOCUMENTS sufficient to show any agreements, contracts, or understandings between YOU on the one hand, and any entity or association owned, operated, or controlled by YOU with any title or any interest (e.g. ownership interest or security interest) in any of the ASSERTED WORKS, on the other hand.

REQUEST FOR PRODUCTION NO. 67

DOCUMENTS sufficient to identify any website, THIRD PARTY publication, social media account, or other print or digital media, of which YOU are aware, that (1) summarizes any of the ASSERTED WORKS; (2) reviews or criticizes any of the ASSERTED WORKS; (3) quotes from any of the ASSERTED WORKS; or (4) otherwise replicates more than 10 lines from any of the ASSERTED WORKS (but is not itself an ASSERTED WORK).

REQUEST FOR PRODUCTION NO. 68

DOCUMENTS sufficient to show each website and URL known to YOU at which any of the ASSERTED WORKS may be accessed for free by THIRD PARTIES.

REQUEST FOR PRODUCTION NO. 69

For each website and URL known to YOU at which any of the ASSERTED WORKS may be accessed by THIRD PARTIES for free and/or without YOUR authorization, DOCUMENTS sufficient to show any effort by YOU to have the ASSERTED WORK(S) removed from that website.

REQUEST FOR PRODUCTION NO. 70

DOCUMENTS sufficient to show any efforts undertaken by YOU on or after January 1, 2021, to enforce YOUR copyrights for any of the ASSERTED WORKS, or to monitor for or investigate infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 71

All DOCUMENTS CONCERNING any analyses by YOU of outputs created using META AI MODELS.

REQUEST FOR PRODUCTION NO. 72

All DOCUMENTS CONCERNING any analyses by YOU of outputs created using GENERATIVE AI TOOLS other than META AI MODELS.

REQUEST FOR PRODUCTION NO. 73

DOCUMENTS sufficient to show YOUR corporate organizational structure, including all parent companies, subsidiaries, affiliates, divisions, and trade names/DBAs, and the ownership and control relationships among them, for the period from January 1, 2022, to the present. This request

1 includes current and historical versions, drafts, and any explanatory legends or accompanying
2 materials.

3 **REQUEST FOR PRODUCTION NO. 74**

4 All DOCUMENTS that any of YOUR testifying experts have relied on or considered in
5 forming any opinions in this ACTION.

6 **REQUEST FOR PRODUCTION NO. 75**

7 All DOCUMENTS that YOU may offer, use, or rely on at trial, for summary judgment, in
8 any deposition, or at any other hearing or proceeding in this ACTION.

9 **REQUEST FOR PRODUCTION NO. 76**

10 DOCUMENTS sufficient to show by name any THIRD PARTY who allegedly received
11 from Meta via TORRENTING any of YOUR ASSERTED WORKS.

12 **REQUEST FOR PRODUCTION NO. 77**

13 All DOCUMENTS YOU rely on to support YOUR allegation that any THIRD PARTY
14 received or downloaded YOUR ASSERTED WORKS from Meta.

15 **REQUEST FOR PRODUCTION NO. 78**

16 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
17 TORRENTING a complete READABLE copy of any of YOUR ASSERTED WORKS. Complete
18 means all pages of the ASSERTED WORK are present.

19 **REQUEST FOR PRODUCTION NO. 79**

20 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
21 TORRENTING a complete copy of any of YOUR ASSERTED WORKS. Complete means all
22 pages of the ASSERTED WORK are present.

23 **REQUEST FOR PRODUCTION NO. 80**

24 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
25 TORRENTING any READABLE portion or section of YOUR ASSERTED WORKS.

26 **REQUEST FOR PRODUCTION NO. 81**

27 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
28 TORRENTING any portion or section of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 82

DOCUMENTS sufficient to show which THIRD PARTIES, if any, read a copy of any of YOUR ASSERTED WORKS received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 83

DOCUMENTS sufficient to show whether and how each THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS later used that copy for any purpose, including but not limited to uses enumerated under 17 U.S.C. § 106.

REQUEST FOR PRODUCTION NO. 84

DOCUMENTS sufficient to show how many BitTorrent peers received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 85

For each THIRD PARTY YOU allege received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS, DOCUMENTS sufficient to show that the THIRD PARTY did not use that copy for a fair use purpose under 17 U.S.C. § 107.

REQUEST FOR PRODUCTION NO. 86

DOCUMENTS sufficient to show how (i.e. through what means) any THIRD PARTY downloaded from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 87

All COMMUNICATIONS between YOU and any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 88

DOCUMENTS sufficient to show which THIRD PARTIES displayed (as defined by the Copyright Act, 17 U.S.C. § 101) a copy of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 89

DOCUMENTS sufficient to show which THIRD PARTIES distributed a copy of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 90

DOCUMENTS sufficient to show which THIRD PARTIES performed (as defined by the Copyright Act, 17 U.S.C. § 101) a copy of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 91

DOCUMENTS sufficient to show which THIRD PARTIES reproduced YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 92

DOCUMENTS sufficient to show which THIRD PARTIES created a derivative work of one of YOUR ASSERTED WORKS based on a copy they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 93

DOCUMENTS sufficient to show which THIRD PARTIES made a fair use (as defined in 17 U.S.C. § 107) of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 94

DOCUMENTS sufficient to show all complete (i.e. the entirety of the work) copies of YOUR ASSERTED WORKS that YOU claim were distributed by Meta via TORRENTING to a THIRD PARTY.

REQUEST FOR PRODUCTION NO. 95

DOCUMENTS sufficient to show how many complete (i.e. the entirety of the work) copies of YOUR ASSERTED WORKS YOU claim were distributed by Meta via TORRENTING to a THIRD PARTY.

REQUEST FOR PRODUCTION NO. 96

DOCUMENTS sufficient to identify any instance of direct copyright infringement by a THIRD PARTY that allegedly received from Meta via TORRENTING a copy of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 97

All DOCUMENTS YOU intend to rely on to support YOUR claim that YOU lost any book sales because of the alleged distribution by Meta via TORRENTING of YOUR ASSERTED WORKS to a THIRD PARTY.

REQUEST FOR PRODUCTION NO. 98

Any DOCUMENTS YOU intend to rely on to support YOUR claim that YOU lost revenue as a result of the alleged distribution by Meta via TORRENTING of YOUR ASSERTED WORKS to a THIRD PARTY.

REQUEST FOR PRODUCTION NO. 99

All DOCUMENTS REFLECTING when and how YOU first became aware of Meta's alleged contributory infringement of each of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 100

DOCUMENTS sufficient to show YOUR efforts, or the efforts by those acting on YOUR behalf, to enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone who has allegedly contributorily infringed YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 101

All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 102

All DOCUMENTS CONCERNING any lost sales or other lost opportunity that YOU allegedly suffered due to Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 103

All DOCUMENTS CONCERNING any lost sales or other lost opportunity that YOU allegedly suffered due to a THIRD PARTY's alleged direct infringement of YOUR ASSERTED WORKS, which that THIRD PARTY allegedly received from Meta via TORRENTING.

REQUEST FOR PRODUCTION No. 104

All DOCUMENTS upon which YOU will rely to prove that a THIRD PARTY received from Meta via TORRENTING an entire copy or portion of any of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 105

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding Meta's alleged contributory infringement of one or more of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 106

All DOCUMENTS that any of YOUR testifying experts will rely on, have relied on, or have considered in forming any opinions in this ACTION concerning Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 107

All DOCUMENTS RELATING to any efforts undertaken by YOU to monitor or investigate contributory infringement of one or more of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 108

All DOCUMENTS RELATING to any efforts undertaken by YOU to monitor or investigate direct infringement of one or more of YOUR ASSERTED WORKS by THIRD PARTIES.

REQUEST FOR PRODUCTION No. 109

DOCUMENTS sufficient to show who YOU consider to be YOUR five biggest competitors for publication of books.

REQUEST FOR PRODUCTION No. 110

All copies of THIRD PARTY reviews or criticisms of each of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 111

All DOCUMENTS and COMMUNICATIONS CONCERNING reviews or criticisms of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 112

All DOCUMENTS REFLECTING any analysis completed by YOU or on YOUR behalf regarding sales trends for YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 113

All DOCUMENTS REFLECTING any analysis completed by YOU or on YOUR behalf regarding demand for publications in the genre of inspiration and/or motivation, including but not limited to analysis of YOUR biggest competition and alternative THIRD PARTY sources for such publications.

REQUEST FOR PRODUCTION NO. 114

All DOCUMENTS REFLECTING any analysis completed by YOU or on YOUR behalf regarding demand for publications in the genre of self-help, including but not limited to analysis of YOUR biggest competition and alternative THIRD PARTY sources for such publications.

REQUEST FOR PRODUCTION NO. 115

DOCUMENTS sufficient to show by year the amount of money YOU spent on promoting or marketing each of the ASSERTED WORKS in the U.S., from first sale or publication to the present.

REQUEST FOR PRODUCTION NO. 116

DOCUMENTS sufficient to show each of the channels where each of the ASSERTED WORKS was marketed or promoted in the U.S., from first sale or publication to the present.

REQUEST FOR PRODUCTION NO. 117

DOCUMENTS sufficient to show each of the channels where each of the ASSERTED WORKS was sold or distributed in the U.S., from first sale or publication to the present.

REQUEST FOR PRODUCTION NO. 118

DOCUMENTS sufficient to show the media coverage for each of the ASSERTED WORKS by year in the U.S., from first sale or publication to the present.

REQUEST FOR PRODUCTION NO. 119

DOCUMENTS sufficient to show any price changes by year for each of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 120

DOCUMENTS sufficient to show any stock or supply issues for each of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 121

DOCUMENTS sufficient to show which of the ASSERTED WORKS have ever been available for purchase for audible consumption (e.g. audiobooks).

REQUEST FOR PRODUCTION NO. 122

All COMMUNICATIONS between YOU on the one hand, and any authors of the ASSERTED WORKS, RELATING to the sales performance of those ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 123

All DOCUMENTS sufficient to show any datasets or materials that YOU downloaded for use to evaluate, test, or deploy an AI model.

REQUEST FOR PRODUCTION NO. 124

All COMMUNICATIONS between YOU and any THIRD PARTY CONCERNING META AI MODELS.

REQUEST FOR PRODUCTION NO. 125

DOCUMENTS sufficient to show any studies, assessments, forecasts, or analyses regarding competing products, media formats, platforms, channels, or substitutes for YOUR publications.

REQUEST FOR PRODUCTION NO. 126

DOCUMENTS sufficient to show changes in consumer preferences, audience engagement, and media-consumption patterns for YOUR publications.

REQUEST FOR PRODUCTION NO. 127

DOCUMENTS sufficient to show which of YOUR ASSERTED WORKS may be reviewed, in whole or in part, for free (without a subscription or payment).

1 Dated: June 15, 2026

2
3 By:/s/ Jessica E. Phillips

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Attorneys for Defendant *Meta Platforms, Inc.*

PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of Virginia. 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 9th 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 FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF CHICKEN SOUP FOR THE SOUL, LLC**

☒ (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.

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Executed on June 15, 2026, at Washington, D.C.

/s/ Jessica E. Phillips
Jessica E. Phillips

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Attorneys for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

COGNELLA, INC.,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
PLAINTIFF COGNELLA, INC.**

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF COGNELLA, INC.

SET NUMBER: ONE (1)

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Cognella, Inc. (“Cognella” or “Plaintiff”) produce the following documents and things within thirty (30) days of service of this First Set of Requests for Production (“Requests”) at the offices of Dunn Isaacson Rhee LLP, 401 9th Street NW, Washington, D.C. 20004, or via an electronic production (e.g. FTP transfer, Liquidfiles, or another mutually-agreeable means).

DEFINITIONS

The following terms shall have the following definitions and meanings, regardless of capitalization, unless another definition or meaning clearly appears from the context in which the term is used:

1. YOU, YOUR, or YOURS mean Plaintiff Cognella and all its parents, subsidiaries, predecessors, successors, divisions, imprints, and all officers, directors, employees, agents, attorneys, and other persons acting or purporting to act on its behalf.

2. ACTION means the lawsuit titled *Cognella, Inc. v. Meta Platforms, Inc.*, Case No. 3:26-cv-04053-VC (N.D. Cal.).

3. COMPLAINT means the operative complaint against Meta in the ACTION.

4. ASSERTED WORKS means the literary works that YOU have alleged in the ACTION and/or COMPLAINT that Meta has allegedly infringed.

5. GENERATIVE AI TOOL means any artificial intelligence system capable of producing text, images, audio, video, or other audiovisual content (e.g., large language models and diffusion models), including but not limited to ChatGPT, Gemini, Claude, Meta.AI, and Llama—including any and all versions or models thereof—and any internal or proprietary system, tool, or platform with any such capabilities.

1 6. REGISTRATION MATERIALS means applications, certificates, deposits,
2 correspondence, continuations, amendments, and communications with the U.S. Copyright Office
3 for any ASSERTED WORK.

4 7. CMI means Copyright Management Information as defined in 17 U.S.C. § 1202(c).

5 8. LLM means a generative artificial intelligence (“AI”) large language model.

6 9. META AI MODELS shall mean any Meta generative AI models (e.g., Meta.AI,
7 Llama) that are the subject of YOUR COMPLAINT.

8 10. PERSON means any natural person or any business, legal, or governmental entity
9 or association or any other cognizable entity, including, without limitation, corporations,
10 proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations,
11 governmental agencies or instrumentalities, societies, and orders.

12 11. READABLE means a copy of a work that is in a form that can be perceived,
13 understood, or interpreted by humans.

14 12. THIRD PARTY means all PERSONS other than the named Parties to this ACTION.

15 13. TORRENTING is used in the same sense as it is used in Plaintiff’s Complaint, and
16 means a method of downloading and sharing files directly between users (peer-to-peer, or P2P)
17 over the internet, rather than downloading from a single, central server.

18 14. COMMUNICATION(S) is used in its broadest sense and means any transmission
19 of information from one PERSON or entity to another by any means, including without limitation
20 DOCUMENTS consisting of or containing written communications, telephone communications, in
21 person communications, email, texts, Slack, social media posts or messages, instant messaging, and
22 any other electronic communications.

23 15. DOCUMENT(S) means the original and all non-identical copies (including drafts
24 and those with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as
25 defined in Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil
26 Procedure 34, and includes papers of all kinds and electronically stored information, including by
27 way of example and without limitation, electronic mail, letters, communications, memoranda,
28 notes, computer generated data, calendars, records, minutes, studies, reports, notebooks, messages,

1 telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written
 2 notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data,
 3 source code, data compilation, pictures, photographs, books, pamphlets, publications,
 4 advertisements, sales literature, brochures, manuals, price lists, announcements, and any other
 5 writings, records, or tangible objects produced or reproduced mechanically, electrically,
 6 electronically, photographically, or chemically. The term also includes any parent or child
 7 attachment or other documents embedded or linked in any way to a requested DOCUMENT. For
 8 the avoidance of doubt, DOCUMENTS includes COMMUNICATIONS.

9 16. CONCERNING or REFERRING or RELATING or REFLECTING are used
 10 interchangeably, shall be construed in the broadest possible manner, and shall mean constituting,
 11 relating to, reflecting, regarding, memorializing, identifying, embodying, referring to, pertaining
 12 to, commenting on, discussing, analyzing, considering, describing, containing, consisting of,
 13 connected to, indicating, evidencing, supporting, or refuting.

14 **INSTRUCTIONS**

15 1. Wherever used herein: the singular shall include the plural and vice versa; verb
 16 tenses shall be interpreted to include past, present, and future tenses; the word “all” includes the
 17 word “any” and vice versa; and the terms “and” and “or” shall be construed either disjunctively or
 18 conjunctively as necessary to bring within the scope of these Requests any DOCUMENTS that
 19 might otherwise be construed to be outside their scope.

20 2. Wherever used herein, the term “including” shall be construed as including, but not
 21 limited to, the referenced item(s), matter(s), or subject(s).

22 3. YOU must produce all DOCUMENTS in YOUR possession, custody, or control,
 23 wherever located.

24 4. Each DOCUMENT must be produced as it is kept in the usual course of business,
 25 including all file folders, binders, notebooks, data sharing system and other devices by which such
 26 papers, data, information or things may be organized, separated or stored. For example, a
 27 DOCUMENT or thing that is part of a file, docket or other grouping should be physically produced
 28

1 together with all other DOCUMENTS from said file, docket, or grouping, in the same order or
2 manner of arrangement.

3 5. DOCUMENTS should be produced in a form pursuant to a production protocol to
4 be agreed upon by the parties, in a form in which they are ordinarily maintained (e.g., native form),
5 or in a reasonably usable form (e.g., TIFF images with Relativity-compatible load files).

6 6. If any of the Requests cannot be responded to in full after exercising due diligence
7 to secure the information, respond to the extent possible, specifying YOUR inability to respond to
8 the remainder and stating whatever information YOU have concerning the unanswered portions.

9 7. If YOU object to all or any portion of a particular Request: (i) produce all
10 DOCUMENTS within the scope of the Request to which YOU do not object; and (ii) describe
11 whether—and to what extent—YOU have limited YOUR production of DOCUMENTS as a result
12 of YOUR objection(s).

13 8. If any DOCUMENT responsive to these Requests is withheld under a claim of
14 privilege, YOU must promptly comply with the requirements of Federal Rule of Civil Procedure
15 26(b)(5) and any other operative agreement between the parties as to each DOCUMENT for which
16 a claim of privilege or protection from discovery is made.

17 9. When a DOCUMENT contains both privileged and non-privileged material, the
18 non-privileged material must be disclosed to the fullest extent possible without disclosing the
19 privileged material. If a privilege is asserted with regard to part of the material contained in a
20 DOCUMENT, the party claiming the privilege must clearly indicate the portions as to which the
21 privilege is claimed. When a DOCUMENT has been redacted or altered in any fashion, YOU shall
22 identify as to each DOCUMENT the reason for the redaction or alteration, the date of the redaction
23 or alteration, and the individual performing the redaction or alteration. Any redaction must be
24 clearly visible on the redacted DOCUMENT.

25 10. If DOCUMENTS that fall within the scope of a Request were lost or destroyed after
26 this ACTION was filed: (i) describe the DOCUMENTS (type, subject matter, etc.) that have been
27 lost or destroyed; and (ii) explain the circumstances relating to the loss or destruction of such
28 DOCUMENTS.

11. If YOU have no DOCUMENTS that fall within the scope of a Request, please so state in YOUR written response thereto.

12. These Requests are continuing in nature and YOUR responses to them are to be promptly supplemented or amended if, after the time of YOUR initial responses, YOU learn that any response is or has become in some material respect incomplete or incorrect, pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1

DOCUMENTS sufficient to show the REGISTRATION MATERIALS for each ASSERTED WORK, including but not limited to applications, deposits, certificates, and correspondence with the Copyright Office.

REQUEST FOR PRODUCTION NO. 2

DOCUMENTS sufficient to show any previous registration, new material included, or limitations identified in the REGISTRATION MATERIALS for any ASSERTED WORK, including, but not limited to, DOCUMENTS sufficient to show the extent of any new (as opposed to pre-existing) material in a particular edition of an ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 3

DOCUMENTS sufficient to show the chain of title for each ASSERTED WORK, including but not limited to any assignments and amendments thereto.

REQUEST FOR PRODUCTION NO. 4

DOCUMENTS sufficient to identify each PERSON who contributed written material to each ASSERTED WORK and the extent of their contributions.

REQUEST FOR PRODUCTION NO. 5

For each of the ASSERTED WORKS that is not a work made for hire (as that term is used and defined in 17 U.S.C. § 101), DOCUMENTS sufficient to show the basis for YOUR assertion of rights in the work, including, but not limited to, any agreement(s) or correspondence with the author of the work.

REQUEST FOR PRODUCTION NO. 6

DOCUMENTS sufficient to identify each literary work (by title and author) that YOU and/or any THIRD PARTY authors of the ASSERTED WORKS purchased, acquired, borrowed, referenced, or reviewed for purposes of researching, writing, or editing the ASSERTED WORKS, whether or not such works are identified as reference material in the ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 7

All DOCUMENTS CONCERNING any requests by YOU and/or any THIRD PARTY authors of the ASSERTED WORKS for permission to quote, reference, or otherwise use works written by THIRD PARTIES in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 8

All DOCUMENTS CONCERNING any licenses YOU have acquired to quote, reference, or otherwise use works written by THIRD PARTIES in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 9

All DOCUMENTS CONCERNING any complaints or allegations by THIRD PARTIES of plagiarism or copyright infringement in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 10

DOCUMENTS sufficient to show any written materials used in preparation of the ASSERTED WORKS, including notes and outlines.

REQUEST FOR PRODUCTION NO. 11

DOCUMENTS sufficient to identify any THIRD PARTY written materials relied upon or used as inspiration during the creation of any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 12

All DOCUMENTS between YOU and any PERSON CONCERNING any actual or potential claims against Meta, including direct COMMUNICATIONS, interviews, statements to the press, and social media posts.

REQUEST FOR PRODUCTION NO. 13

All DOCUMENTS between YOU and any PERSON CONCERNING actual or potential claims against developers of LLMs other than Meta, including direct COMMUNICATIONS, interviews, statements to the press, and social media posts.

REQUEST FOR PRODUCTION NO. 14

All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about Meta.

REQUEST FOR PRODUCTION NO. 15

All COMMUNICATIONS between YOU and any PERSONS who contributed written material to the ASSERTED WORKS, CONCERNING this ACTION.

REQUEST FOR PRODUCTION NO. 16

DOCUMENTS sufficient to show all Board of Directors minutes, presentations, or executive-level briefings CONCERNING this ACTION.

REQUEST FOR PRODUCTION NO. 17

All DOCUMENTS produced or provided to YOU by THIRD PARTIES RELATING TO this ACTION.

REQUEST FOR PRODUCTION NO. 18

All DOCUMENTS REFLECTING when and how YOU first became aware of Meta's alleged infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 19

All DOCUMENTS REFLECTING when and how YOU first became aware of the alleged infringement of the ASSERTED WORKS by THIRD PARTY developers of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 20

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding Meta's alleged infringement of one or more of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 21

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding alleged infringement of one or more of the ASSERTED WORKS by THIRD PARTY developers of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 22

All of YOUR COMMUNICATIONS with any THIRD PARTY CONCERNING META AI MODELS.

REQUEST FOR PRODUCTION NO. 23

All DOCUMENTS CONCERNING YOUR allegations that Meta distributed any ASSERTED WORK, including but not limited to via TORRENTING or other peer-to-peer protocols, including any technical analyses and network logs.

REQUEST FOR PRODUCTION NO. 24

All DOCUMENTS CONCERNING YOUR allegations that Meta “induced” or “materially contributed” to THIRD PARTY infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 25

DOCUMENTS sufficient to show all Board of Directors minutes, presentations, or executive-level briefings CONCERNING GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 26

DOCUMENTS sufficient to show YOUR policies, guidelines, standards, instructions, or directives (formal or informal) CONCERNING the use of GENERATIVE AI TOOLS by employees, contractors, or other PERSONS working at YOUR direction or on YOUR behalf.

REQUEST FOR PRODUCTION NO. 27

DOCUMENTS sufficient to show any GENERATIVE AI TOOLS that YOU have used, or that have been used on YOUR behalf, including, as applicable, the account username(s) for each such tool and the date the account was created.

REQUEST FOR PRODUCTION NO. 28

All DOCUMENTS CONCERNING any instances in which YOU approved the use of META AI MODELS by YOUR employees or contractors.

REQUEST FOR PRODUCTION NO. 29

DOCUMENTS sufficient to show any GENERATIVE AI TOOL tested or evaluated by YOU for use by YOUR employees or contractors, including, but not limited to, vendor contracts, non-disclosure agreements (NDAs), statements of work, or research reports or analyses.

REQUEST FOR PRODUCTION NO. 30

DOCUMENTS sufficient to show all business plans, analyses, assessments, roadmaps, research reports, or other studies CONCERNING YOUR actual or proposed development or training of any GENERATIVE AI TOOL.

REQUEST FOR PRODUCTION NO. 31

DOCUMENTS sufficient to show YOUR development, training, or contemplated development or training of any GENERATIVE AI TOOL, including training datasets, data sources, or model weights.

REQUEST FOR PRODUCTION NO. 32

DOCUMENTS sufficient to show all GENERATIVE AI TOOLS incorporated into any offering provided to YOU, including, but not limited to AI ad generators.

REQUEST FOR PRODUCTION NO. 33

DOCUMENTS sufficient to show all business plans, analyses, assessments, roadmaps, research reports, or other studies CONCERNING YOUR incorporation of any GENERATIVE AI TOOLS into any offering provided by YOU.

REQUEST FOR PRODUCTION NO. 34

Copies of YOUR billing statements REFLECTING the amount YOU have paid for YOUR use of any LLM.

REQUEST FOR PRODUCTION NO. 35

DOCUMENTS sufficient to show any articles, blog posts, books, or other written works published by YOU that instruct on, promote, and/or otherwise condone the use of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 36

Copies of any articles, blog posts, books, or other written works published by YOU or otherwise displayed on YOUR website that were created using GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 37

DOCUMENTS sufficient to show articles, books, or other written works that YOU claim ownership of other than ASSERTED WORKS, and for which the subject matter is the same as or substantively equivalent to one or more of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 38

DOCUMENTS sufficient to show all of the ways in which YOU have monetized the ASSERTED WORKS, including but not limited to direct sales, subscriptions, and bundling.

REQUEST FOR PRODUCTION NO. 39

For each ASSERTED WORK, DOCUMENTS sufficient to show where and how one can download, read, or otherwise purchase the work.

REQUEST FOR PRODUCTION NO. 40

DOCUMENTS sufficient to show, between January 1, 2015, and the present, weekly sales volume and corresponding revenue, costs, and profits corresponding to the ASSERTED WORKS and separated by edition (e.g. hardcover, soft cover) and channel (e.g., digital, print, etc.).

REQUEST FOR PRODUCTION NO. 41

DOCUMENTS sufficient to show, between January 1, 2015, and the present, monthly revenue, profit, and costs corresponding to any licensing of any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 42

DOCUMENTS sufficient to show, between January 1, 2015, and the present, monthly revenue, profit, and costs corresponding to any subscriptions that incorporate access to any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 43

For each of YOUR ASSERTED WORKS that is available via Kindle Unlimited or any other online subscriptions, DOCUMENTS sufficient to show, on a monthly basis, the number of readers for each work between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 44

For each of YOUR ASSERTED WORKS that is available via Kindle Unlimited or other online subscriptions, DOCUMENTS sufficient to show, on a monthly basis, Kindle Edition Normalized Pages tracking data between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 45

To the extent that YOU have made an ASSERTED WORK available to read on YOUR website or any website controlled by YOU (whether for a fee or for free), DOCUMENTS sufficient to show the number of daily visitors to the webpage containing the ASSERTED WORK between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 46

DOCUMENTS sufficient to show, on a monthly basis, the number of subscribers to any magazine published by YOU that has incorporated one or more ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 47

All DOCUMENTS CONCERNING any efforts by YOU on or after January 1, 2021, to make any of the ASSERTED WORKS, or portions thereof, available on the internet for free.

REQUEST FOR PRODUCTION NO. 48

DOCUMENTS sufficient to identify each instance on or after January 1, 2021, in which YOU provided free copies of any of the ASSERTED WORKS to THIRD PARTIES for purposes of soliciting reviews, commentary, criticism, endorsements, or summaries.

REQUEST FOR PRODUCTION NO. 49

DOCUMENTS sufficient to show any business plan, go-to-market plan, market analysis, study, assessment, or forecast, for each ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 50

DOCUMENTS sufficient to show any assessment or analysis of YOUR competition and/or competitors for the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 51

DOCUMENTS sufficient to show any studies, surveys, reports, or analyses RELATING to YOUR marketing or sales of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 52

DOCUMENTS sufficient to show YOUR revenues or consideration received for the promotion of GENERATIVE AI TOOLS on YOUR website.

REQUEST FOR PRODUCTION No. 53

All DOCUMENTS CONCERNING the injury or other harm that YOU allegedly suffered due to Meta's alleged infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 54

DOCUMENTS sufficient to show any valuations of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 55

All DOCUMENTS evidencing a market for sale or license of YOUR ASSERTED WORKS, or derivations thereof, for purposes of training GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION No. 56

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to Meta's economic impact on YOUR business.

REQUEST FOR PRODUCTION No. 57

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to Meta's economic impact on YOUR ASSERTED WORKS and/or any markets for YOUR ASSERTED WORKS or derivations of the ASSERTED WORKS, including but not limited to any licensing or product markets.

REQUEST FOR PRODUCTION No. 58

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to any GENERATIVE AI TOOL'S economic impact on YOUR business.

REQUEST FOR PRODUCTION No. 59

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to any GENERATIVE AI TOOL's economic impact on the ASSERTED WORKS and/or any markets for the ASSERTED WORKS or derivations of the ASSERTED WORKS, including but not limited to any licensing or product markets.

REQUEST FOR PRODUCTION NO. 60

All DOCUMENTS that YOU may offer, use, or rely on to support any contention that there is a market for licensing the ASSERTED WORKS to train any LLM, including DOCUMENTS sufficient to identify that market, when and how it first developed, and the PERSONS involved, and any DOCUMENTS RELATING to the licensing or use of the ASSERTED WORKS in such market(s).

REQUEST FOR PRODUCTION NO. 61

All DOCUMENTS upon which YOU will rely to support any contention that Meta's use of the ASSERTED WORKS to train an LLM caused harm to any market for those works.

REQUEST FOR PRODUCTION NO. 62

All DOCUMENTS that YOU may offer, use, or rely on to support any contention that Meta's use of the ASSERTED WORKS to train any LLM was not a fair use under 17 U.S.C. § 107.

REQUEST FOR PRODUCTION NO. 63

DOCUMENTS sufficient to show any licensing, permissions, or consents given by YOU or on YOUR behalf to THIRD PARTIES CONCERNING the ASSERTED WORKS on or after January 1, 2015.

REQUEST FOR PRODUCTION NO. 64

DOCUMENTS sufficient to show prospective licensing opportunities for the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 65

All DOCUMENTS CONCERNING actual or prospective licensing of the ASSERTED WORKS to train a GENERATIVE AI TOOL.

REQUEST FOR PRODUCTION NO. 66

DOCUMENTS sufficient to show any agreements, contracts, or understandings between YOU on the one hand, and any entity or association owned, operated, or controlled by YOU with any title or any interest (e.g. ownership interest or security interest) in any of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 67

DOCUMENTS sufficient to identify any website, THIRD PARTY publication, social media account, or other print or digital media, of which you are aware, that (1) summarizes any of the ASSERTED WORKS; (2) reviews or criticizes any of the ASSERTED WORKS; (3) quotes from any of the ASSERTED WORKS; or (4) otherwise replicates more than 10 lines from any of the ASSERTED WORKS (but is not itself an ASSERTED WORK).

REQUEST FOR PRODUCTION NO. 68

DOCUMENTS sufficient to show each website and URL known to YOU at which any of the ASSERTED WORKS may be accessed for free by THIRD PARTIES.

REQUEST FOR PRODUCTION NO. 69

For each website and URL known to YOU at which any of the ASSERTED WORKS may be accessed by THIRD PARTIES for free and/or without YOUR authorization, DOCUMENTS sufficient to show any effort by YOU to have the ASSERTED WORK(S) removed from that website.

REQUEST FOR PRODUCTION NO. 70

DOCUMENTS sufficient to show any efforts undertaken by YOU on or after January 1, 2021, to enforce YOUR copyrights for any of the ASSERTED WORKS, or to monitor for or investigate infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 71

All DOCUMENTS CONCERNING any analyses by YOU of outputs created using META AI MODELS.

REQUEST FOR PRODUCTION NO. 72

All DOCUMENTS CONCERNING any analyses by YOU of outputs created using GENERATIVE AI TOOLS other than META AI MODELS.

REQUEST FOR PRODUCTION NO. 73

DOCUMENTS sufficient to show YOUR corporate organizational structure, including all parent companies, subsidiaries, affiliates, divisions, and trade names/DBAs, and the ownership and control relationships among them, for the period from January 1, 2022, to present. This request

1 includes current and historical versions, drafts, and any explanatory legends or accompanying
2 materials.

3 **REQUEST FOR PRODUCTION NO. 74**

4 All DOCUMENTS that any of YOUR testifying experts have relied on or considered in
5 forming any opinions in this ACTION.

6 **REQUEST FOR PRODUCTION NO. 75**

7 All DOCUMENTS that YOU may offer, use, or rely on at trial, for summary judgment, in
8 any deposition, or at any other hearing or proceeding in this ACTION.

9 **REQUEST FOR PRODUCTION NO. 76**

10 DOCUMENTS sufficient to show by name any THIRD PARTY who allegedly received
11 from Meta via TORRENTING any of YOUR ASSERTED WORKS.

12 **REQUEST FOR PRODUCTION NO. 77**

13 All DOCUMENTS YOU rely on to support YOUR allegation that any THIRD PARTY
14 received or downloaded YOUR ASSERTED WORKS from Meta.

15 **REQUEST FOR PRODUCTION NO. 78**

16 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
17 TORRENTING a complete READABLE copy of any of YOUR ASSERTED WORKS. Complete
18 means all pages of the ASSERTED WORK are present.

19 **REQUEST FOR PRODUCTION NO. 79**

20 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
21 TORRENTING a complete copy of any of YOUR ASSERTED WORKS. Complete means all
22 pages of the ASSERTED WORK are present.

23 **REQUEST FOR PRODUCTION NO. 80**

24 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
25 TORRENTING any READABLE portion or section of YOUR ASSERTED WORKS.

26 **REQUEST FOR PRODUCTION NO. 81**

27 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
28 TORRENTING any portion or section of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 82

DOCUMENTS sufficient to show which THIRD PARTIES, if any, read a copy of any of YOUR ASSERTED WORKS received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 83

DOCUMENTS sufficient to show whether and how each THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS later used that copy for any purpose, including but not limited to uses enumerated under 17 U.S.C. § 106.

REQUEST FOR PRODUCTION NO. 84

DOCUMENTS sufficient to show how many BitTorrent peers received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 85

For each THIRD PARTY YOU allege received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS, DOCUMENTS sufficient to show that the THIRD PARTY did not use that copy for a fair use purpose under 17 U.S.C. § 107.

REQUEST FOR PRODUCTION NO. 86

DOCUMENTS sufficient to show how (i.e. through what means) any THIRD PARTY downloaded from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 87

All COMMUNICATIONS between YOU and any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 88

DOCUMENTS sufficient to show which THIRD PARTIES displayed (as defined by the Copyright Act, 17 U.S.C. § 101) a copy of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 89

DOCUMENTS sufficient to show which THIRD PARTIES distributed a copy of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 90

DOCUMENTS sufficient to show which THIRD PARTIES performed (as defined by the Copyright Act, 17 U.S.C. § 101) a copy of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 91

DOCUMENTS sufficient to show which THIRD PARTIES reproduced YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 92

DOCUMENTS sufficient to show which THIRD PARTIES created a derivative work of one of YOUR ASSERTED WORKS based on a copy they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 93

DOCUMENTS sufficient to show which THIRD PARTIES made a fair use (as defined in 17 U.S.C. § 107) of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 94

DOCUMENTS sufficient to show all complete (i.e. the entirety of the work) copies of YOUR ASSERTED WORKS that YOU claim were distributed by Meta via TORRENTING to a THIRD PARTY.

REQUEST FOR PRODUCTION NO. 95

DOCUMENTS sufficient to show how many complete (i.e. the entirety of the work) copies of YOUR ASSERTED WORKS YOU claim were distributed by Meta via TORRENTING to a THIRD PARTY.

REQUEST FOR PRODUCTION NO. 96

DOCUMENTS sufficient to identify any instance of direct copyright infringement by a THIRD PARTY that allegedly received from Meta via TORRENTING a copy of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 97

All DOCUMENTS YOU intend to rely on to support YOUR claim that YOU lost any book sales because of the alleged distribution by Meta via TORRENTING of YOUR ASSERTED WORKS to a THIRD PARTY.

REQUEST FOR PRODUCTION No. 98

Any DOCUMENTS YOU intend to rely on to support YOUR claim that YOU lost revenue as a result of the alleged distribution by Meta via TORRENTING of YOUR ASSERTED WORKS to a THIRD PARTY.

REQUEST FOR PRODUCTION No. 99

All DOCUMENTS REFLECTING when and how YOU first became aware of Meta's alleged contributory infringement of each of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 100

DOCUMENTS sufficient to show YOUR efforts, or the efforts by those acting on YOUR behalf, to enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone who has allegedly contributorily infringed YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 101

All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 102

All DOCUMENTS CONCERNING any lost sales or other lost opportunity that YOU allegedly suffered due to Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 103

All DOCUMENTS CONCERNING any lost sales or other lost opportunity that YOU allegedly suffered due to a THIRD PARTY's alleged direct infringement of YOUR ASSERTED WORKS, which that THIRD PARTY allegedly received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 104

All DOCUMENTS upon which YOU will rely to prove that a THIRD PARTY received from Meta via TORRENTING an entire copy or portion of any of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 105

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding Meta's alleged contributory infringement of one or more of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 106

All DOCUMENTS that any of YOUR testifying experts will rely on, have relied on, or have considered in forming any opinions in this ACTION concerning Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 107

All DOCUMENTS RELATING to any efforts undertaken by YOU to monitor or investigate contributory infringement of one or more of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 108

All DOCUMENTS relating to any efforts undertaken by YOU to monitor or investigate direct infringement of one or more of YOUR ASSERTED WORKS by THIRD PARTIES.

REQUEST FOR PRODUCTION NO. 109

DOCUMENTS sufficient to show who YOU consider to be YOUR five biggest competitors for publication of textbooks.

REQUEST FOR PRODUCTION NO. 110

All copies of THIRD PARTY reviews or criticisms of each of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 111

All DOCUMENTS and COMMUNICATIONS CONCERNING reviews or criticisms of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 112

All DOCUMENTS REFLECTING any analysis completed by YOU or on YOUR behalf regarding sales trends for YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 113

All DOCUMENTS REFLECTING any analysis completed by YOU or on YOUR behalf regarding demand for publications of textbooks, including but not limited to analysis of YOUR biggest competition and alternative THIRD PARTY sources for such publications.

REQUEST FOR PRODUCTION NO. 114

DOCUMENTS sufficient to show by year the amount of money YOU spent on promoting or marketing each of the ASSERTED WORKS in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION NO. 115

DOCUMENTS sufficient to show each of the channels where each of the ASSERTED WORKS was marketed or promoted in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION NO. 116

DOCUMENTS sufficient to show each of the channels where each of the ASSERTED WORKS was sold or distributed in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION NO. 117

DOCUMENTS sufficient to show the media coverage for each of the ASSERTED WORKS by year in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION NO. 118

DOCUMENTS sufficient to show any price changes by year for each of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 119

DOCUMENTS sufficient to show any stock or supply issues for each of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 120

1 DOCUMENTS sufficient to show which of the ASSERTED WORKS have ever been
2 available for purchase for audible consumption (e.g. audiobooks).

3 **REQUEST FOR PRODUCTION NO. 121**

4 All COMMUNICATIONS between YOU on the one hand, and any authors of the
5 ASSERTED WORKS, RELATING to the sales performance of those ASSERTED WORKS.

6 **REQUEST FOR PRODUCTION NO. 122**

7 All DOCUMENTS sufficient to show any datasets or materials that YOU downloaded for
8 use to evaluate, test, or deploy an AI model.

9 **REQUEST FOR PRODUCTION NO. 123**

10 All COMMUNICATIONS between YOU and any THIRD PARTY CONCERNING
11 META AI MODELS.

12 **REQUEST FOR PRODUCTION NO. 124**

13 DOCUMENTS sufficient to show any studies, assessments, forecasts, or analyses regarding
14 competing products, media formats, platforms, channels, or substitutes for YOUR publications.

15 **REQUEST FOR PRODUCTION NO. 125**

16 DOCUMENTS sufficient to show changes in consumer preferences, audience engagement,
17 and media-consumption patterns for YOUR publications.

18 **REQUEST FOR PRODUCTION NO. 126**

19 DOCUMENTS sufficient to show which of YOUR ASSERTED WORKS may be
20 reviewed, in whole or in part, for free (without a subscription or payment).

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1 Dated: June 12, 2026

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3 By:/s/ Jessica E. Phillips

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PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of Virginia. 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 9th 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 FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF COGNELLA, INC.**



(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.

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Executed on June 12, 2026, at Washington, D.C.

/s/ Jessica E. Phillips
Jessica E. Phillips

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Attorneys for Defendant *Meta Platforms, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC., *et al.*,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
PLAINTIFF CAMBRONNE INC.**

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF CAMBRONNE INC.

SET NUMBER: ONE (1)

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Cambronne Inc. (“Cambronne” or “Plaintiff”) produce the following documents and things within thirty (30) days of service of this First Set of Requests for Production (“Requests”) at the offices of Dunn Isaacson Rhee LLP, 401 9th Street NW, Washington, D.C. 20004 or via an electronic production (e.g. FTP transfer, LiquidFiles, or another mutually-agreeable means).

DEFINITIONS

The following terms shall have the following definitions and meanings, regardless of capitalization, unless another definition or meaning clearly appears from the context in which the term is used:

1. YOU, YOUR, or YOURS mean Plaintiff Cambronne and all its parents, subsidiaries, predecessors, successors, divisions, imprints, and all officers, directors, employees, agents, attorneys, and other persons acting or purporting to act on its behalf.

2. ACTION means the lawsuit titled *Cambronne Inc., et al. v. Meta Platforms, Inc.*, Case No. 3:26-cv-03725-VC (N.D. Cal.).

3. COMPLAINT means the operative complaint against Meta in the ACTION.

4. ASSERTED WORKS means the literary works that YOU have alleged in the ACTION and/or COMPLAINT that Meta has allegedly infringed.

5. GENERATIVE AI TOOL means any artificial intelligence system capable of producing text, images, audio, video, or other audiovisual content (e.g., large language models and diffusion models), including but not limited to ChatGPT, Gemini, Claude, Meta.AI, and Llama—including any and all versions or models thereof—and any internal or proprietary system, tool, or platform with any such capabilities.

6. REGISTRATION MATERIALS means applications, certificates, deposits, correspondence, continuations, amendments, and communications with the U.S. Copyright Office

1 for any ASSERTED WORK.

2 7. CMI means Copyright Management Information as defined in 17 U.S.C. § 1202(c).

3 8. LLM means a generative artificial intelligence (“AI”) large language model.

4 9. META AI MODELS shall mean any Meta generative AI models (e.g., Meta.AI,
5 Llama) that are the subject of YOUR COMPLAINT.

6 10. PERSON means any natural person or any business, legal, or governmental entity
7 or association or any other cognizable entity, including, without limitation, corporations,
8 proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations,
9 governmental agencies or instrumentalities, societies, and orders.

10 11. THIRD PARTY means all PERSONS other than the named Parties to this ACTION.

11 12. TORRENTING is used in the same sense as it is used in Plaintiff’s Complaint, and
12 means a method of downloading and sharing files directly between users (peer-to-peer, or P2P)
13 over the internet, rather than downloading from a single, central server.

14 13. COMMUNICATION(S) is used in its broadest sense and means any transmission
15 of information from one PERSON or entity to another by any means, including without limitation
16 DOCUMENTS consisting of or containing written communications, telephone communications, in
17 person communications, email, texts, Slack, social media posts or messages, instant messaging, and
18 any other electronic communications.

19 14. DOCUMENT(S) means the original and all non-identical copies (including drafts
20 and those with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as
21 defined in Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil
22 Procedure 34, and includes papers of all kinds and electronically stored information, including by
23 way of example and without limitation, electronic mail, letters, communications, memoranda,
24 notes, computer generated data, calendars, records, minutes, studies, reports, notebooks, messages,
25 telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written
26 notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data,
27 source code, data compilation, pictures, photographs, books, pamphlets, publications,
28 advertisements, sales literature, brochures, manuals, price lists, announcements, and any other

1 writings, records, or tangible objects produced or reproduced mechanically, electrically,
2 electronically, photographically, or chemically. The term also includes any parent or child
3 attachment or other documents embedded or linked in any way to a requested DOCUMENT.

4 15. CONCERNING or REFERRING or RELATING or REFLECTING are used
5 interchangeably, shall be construed in the broadest possible manner, and shall mean constituting,
6 relating to, reflecting, regarding, memorializing, identifying, embodying, referring to, pertaining
7 to, commenting on, discussing, analyzing, considering, describing, containing, consisting of,
8 connected to, indicating, evidencing, supporting, or refuting.

9 **INSTRUCTIONS**

10 1. Wherever used herein: the singular shall include the plural and vice versa; verb
11 tenses shall be interpreted to include past, present, and future tenses; the word “all” includes the
12 word “any” and vice versa; and the terms “and” and “or” shall be construed either disjunctively or
13 conjunctively as necessary to bring within the scope of these Requests any DOCUMENTS that
14 might otherwise be construed to be outside their scope.

15 2. Wherever used herein, the term “including” shall be construed as including, but not
16 limited to, the referenced item(s), matter(s), or subject(s).

17 3. YOU must produce all DOCUMENTS in YOUR possession, custody, or control,
18 wherever located.

19 4. Each DOCUMENT must be produced as it is kept in the usual course of business,
20 including all file folders, binders, notebooks, data sharing system and other devices by which such
21 papers, data, information or things may be organized, separated or stored. For example, a
22 DOCUMENT or thing that is part of a file, docket or other grouping should be physically produced
23 together with all other DOCUMENTS from said file, docket, or grouping, in the same order or
24 manner of arrangement.

25 5. DOCUMENTS should be produced in a form pursuant to a production protocol to
26 be agreed upon by the parties, in a form in which they are ordinarily maintained (e.g., native form),
27 or in a reasonably usable form (e.g., TIFF images with Relativity-compatible load files).

28 6. If any of the Requests cannot be responded to in full after exercising due diligence

1 to secure the information, respond to the extent possible, specifying YOUR inability to respond to
2 the remainder and stating whatever information YOU have CONCERNING the unanswered
3 portions.

4 7. If YOU object to all or any portion of a particular Request: (i) produce all
5 DOCUMENTS within the scope of the Request to which YOU do not object; and (ii) describe
6 whether—and to what extent—YOU have limited YOUR production of DOCUMENTS as a result
7 of YOUR objection(s).

8 8. If any DOCUMENT responsive to these Requests is withheld under a claim of
9 privilege, YOU must promptly comply with the requirements of Federal Rule of Civil Procedure
10 26(b)(5) and any other operative agreement between the parties as to each DOCUMENT for which
11 a claim of privilege or protection from discovery is made.

12 9. When a DOCUMENT contains both privileged and non-privileged material, the
13 non-privileged material must be disclosed to the fullest extent possible without disclosing the
14 privileged material. If a privilege is asserted with regard to part of the material contained in a
15 DOCUMENT, the party claiming the privilege must clearly indicate the portions as to which the
16 privilege is claimed. When a DOCUMENT has been redacted or altered in any fashion, YOU shall
17 identify as to each DOCUMENT the reason for the redaction or alteration, the date of the redaction
18 or alteration, and the individual performing the redaction or alteration. Any redaction must be
19 clearly visible on the redacted DOCUMENT.

20 10. If DOCUMENTS that fall within the scope of a Request were lost or destroyed after
21 this ACTION was filed: (i) describe the DOCUMENTS (type, subject matter, etc.) that have been
22 lost or destroyed; and (ii) explain the circumstances relating to the loss or destruction of such
23 DOCUMENTS.

24 11. If YOU have no DOCUMENTS that fall within the scope of a Request, please so
25 state in YOUR written response thereto.

26 12. These Requests are continuing in nature and YOUR responses to them are to be
27 promptly supplemented or amended if, after the time of YOUR initial responses, YOU learn that
28 any response is or has become in some material respect incomplete or incorrect, pursuant to Rule

26(e) of the Federal Rules of Civil Procedure.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1

DOCUMENTS sufficient to show the REGISTRATION MATERIALS for each ASSERTED WORK, including but not limited to applications, deposits, certificates, and correspondence with the Copyright Office.

REQUEST FOR PRODUCTION NO. 2

DOCUMENTS sufficient to show any previous registration, new material included, or limitations identified in the REGISTRATION MATERIALS for any ASSERTED WORK, including, but not limited to, DOCUMENTS sufficient to show the extent of any new (as opposed to pre-existing) material in a particular edition of an ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 3

DOCUMENTS sufficient to show the chain of title for each ASSERTED WORK, including but not limited to any assignments and amendments thereto.

REQUEST FOR PRODUCTION NO. 4

DOCUMENTS sufficient to identify each PERSON who contributed written material to each ASSERTED WORK and the extent of their contributions.

REQUEST FOR PRODUCTION NO. 5

For each of the ASSERTED WORKS that is not a work made for hire (as that term is used and defined in 17 U.S.C. § 101), DOCUMENTS sufficient to show the basis for YOUR assertion of rights in the work, including, but not limited to, any agreement(s) or correspondence with the author of the work.

REQUEST FOR PRODUCTION NO. 6

DOCUMENTS sufficient to identify each literary work (by title and author) that YOU and/or any THIRD PARTY authors of the ASSERTED WORKS purchased, acquired, borrowed, referenced, or reviewed for purposes of researching, writing, or editing the ASSERTED WORKS, whether or not such works are identified as reference material in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 7

All DOCUMENTS CONCERNING any requests by YOU and/or any THIRD PARTY authors of the ASSERTED WORKS for permission to quote, reference, or otherwise use works written by THIRD PARTIES in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 8

All DOCUMENTS CONCERNING any licenses YOU have acquired to quote, reference, or otherwise use works written by THIRD PARTIES in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 9

All DOCUMENTS CONCERNING any complaints or allegations by THIRD PARTIES of plagiarism or copyright infringement in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 10

DOCUMENTS sufficient to show any written materials used in preparation of the ASSERTED WORKS, including notes and outlines.

REQUEST FOR PRODUCTION NO. 11

DOCUMENTS sufficient to identify any THIRD PARTY written materials relied upon or used as inspiration during the creation of any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 12

All DOCUMENTS between YOU and any PERSON CONCERNING any actual or potential claims against Meta, including direct COMMUNICATIONS, interviews, statements to the press, and social media posts.

REQUEST FOR PRODUCTION NO. 13

All DOCUMENTS between YOU and any PERSON CONCERNING actual or potential claims against developers of LLMs other than Meta, including direct COMMUNICATIONS, interviews, statements to the press, and social media posts.

REQUEST FOR PRODUCTION NO. 14

All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about Meta.

REQUEST FOR PRODUCTION No. 15

All COMMUNICATIONS between YOU and any PERSONS who contributed written material to the ASSERTED WORKS, CONCERNING this ACTION.

REQUEST FOR PRODUCTION No. 16

DOCUMENTS sufficient to show all Board of Directors minutes, presentations, or executive-level briefings CONCERNING this ACTION.

REQUEST FOR PRODUCTION No. 17

All DOCUMENTS produced or provided to YOU by THIRD PARTIES RELATING TO this ACTION.

REQUEST FOR PRODUCTION No. 18

All DOCUMENTS REFLECTING when and how YOU first became aware of Meta's alleged infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 19

All DOCUMENTS REFLECTING when and how YOU first became aware of the alleged infringement of the ASSERTED WORKS by THIRD PARTY developers of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION No. 20

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding Meta's alleged infringement of one or more of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 21

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding alleged infringement of one or more of the ASSERTED WORKS by THIRD PARTY developers of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION No. 22

All of YOUR COMMUNICATIONS with any THIRD PARTY CONCERNING META AI MODELS.

REQUEST FOR PRODUCTION NO. 23

All DOCUMENTS CONCERNING YOUR allegations that Meta distributed any ASSERTED WORK, including but not limited to via TORRENTING or other peer-to-peer protocols, including any technical analyses and network logs.

REQUEST FOR PRODUCTION NO. 24

All DOCUMENTS CONCERNING YOUR allegations that Meta “induced” or “materially contributed” to THIRD PARTY infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 25

DOCUMENTS sufficient to show all Board of Directors minutes, presentations, or executive-level briefings CONCERNING GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 26

DOCUMENTS sufficient to show YOUR policies, guidelines, standards, instructions, or directives (formal or informal) CONCERNING the use of GENERATIVE AI TOOLS by employees, contractors, or other PERSONS working at YOUR direction or on YOUR behalf.

REQUEST FOR PRODUCTION NO. 27

DOCUMENTS sufficient to show any GENERATIVE AI TOOLS that YOU have used, or that have been used on YOUR behalf, including, as applicable, the account username(s) for each such tool and the date the account was created.

REQUEST FOR PRODUCTION NO. 28

All DOCUMENTS CONCERNING any instances in which YOU approved the use of META AI MODELS by YOUR employees or contractors.

REQUEST FOR PRODUCTION NO. 29

DOCUMENTS sufficient to show any GENERATIVE AI TOOL tested or evaluated by YOU for use by YOUR employees or contractors, including, but not limited to, vendor contracts, non-disclosure agreements (NDAs), statements of work, or research reports or analyses.

REQUEST FOR PRODUCTION NO. 30

DOCUMENTS sufficient to show all business plans, analyses, assessments, roadmaps, research reports, or other studies CONCERNING YOUR actual or proposed development or training of any GENERATIVE AI TOOL.

REQUEST FOR PRODUCTION NO. 31

DOCUMENTS sufficient to show YOUR development, training, or contemplated development or training of any GENERATIVE AI TOOL, including training datasets, data sources, or model weights.

REQUEST FOR PRODUCTION NO. 32

DOCUMENTS sufficient to show all GENERATIVE AI TOOLS incorporated into any offering provided to YOU, including, but not limited to AI ad generators.

REQUEST FOR PRODUCTION NO. 33

DOCUMENTS sufficient to show all business plans, analyses, assessments, roadmaps, research reports, or other studies CONCERNING YOUR incorporation of any GENERATIVE AI TOOLS into any offering provided by YOU.

REQUEST FOR PRODUCTION NO. 34

Copies of YOUR billing statements REFLECTING the amount YOU have paid for YOUR use of any LLM.

REQUEST FOR PRODUCTION NO. 35

DOCUMENTS sufficient to show any articles, blog posts, books, or other written works published by YOU that instruct on, promote, and/or otherwise condone the use of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 36

Copies of any articles, blog posts, books, or other written works published by YOU or otherwise displayed on YOUR website that were created using GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 37

DOCUMENTS sufficient to show articles, books, or other written works that YOU claim ownership of other than ASSERTED WORKS, and for which the subject matter is the same as or substantively equivalent to one or more of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 38

DOCUMENTS sufficient to show all of the ways in which YOU have monetized the ASSERTED WORKS, including but not limited to direct sales, subscriptions, and bundling.

REQUEST FOR PRODUCTION NO. 39

For each ASSERTED WORK, DOCUMENTS sufficient to show where and how one can download, read, or otherwise purchase the work.

REQUEST FOR PRODUCTION NO. 40

DOCUMENTS sufficient to show, between January 1, 2015, and the present, weekly sales volume and corresponding revenue, costs, and profits corresponding to the ASSERTED WORKS and separated by edition (e.g. hardcover, soft cover) and channel (e.g., digital, print, etc.).

REQUEST FOR PRODUCTION NO. 41

DOCUMENTS sufficient to show, between January 1, 2015, and the present, monthly revenue, profit, and costs corresponding to any licensing of any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 42

DOCUMENTS sufficient to show, between January 1, 2015, and the present, monthly revenue, profit, and costs corresponding to any subscriptions that incorporate access to any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 43

For each of YOUR ASSERTED WORKS that is available via Kindle Unlimited or any other online subscriptions, DOCUMENTS sufficient to show, on a monthly basis, the number of readers for each work between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 44

For each of YOUR ASSERTED WORKS that is available via Kindle Unlimited or other online subscriptions, DOCUMENTS sufficient to show, on a monthly basis, Kindle Edition Normalized Pages tracking data between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 45

To the extent that YOU have made an ASSERTED WORK available to read on YOUR website or any website controlled by YOU (whether for a fee or for free), DOCUMENTS sufficient to show the number of daily visitors to the webpage containing the ASSERTED WORK between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 46

DOCUMENTS sufficient to show, on a monthly basis, the number of subscribers to any magazine published by YOU that has incorporated one or more ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 47

All DOCUMENTS CONCERNING any efforts by YOU on or after January 1, 2021, to make any of the ASSERTED WORKS, or portions thereof, available on the internet for free.

REQUEST FOR PRODUCTION NO. 48

DOCUMENTS sufficient to identify each instance on or after January 1, 2021, in which YOU provided free copies of any of the ASSERTED WORKS to THIRD PARTIES for purposes of soliciting reviews, commentary, criticism, endorsements, or summaries.

REQUEST FOR PRODUCTION NO. 49

DOCUMENTS sufficient to show any business plan, go-to-market plan, market analysis, study, assessment, or forecast, for each ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 50

DOCUMENTS sufficient to show any assessment or analysis of YOUR competition and/or competitors for the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 51

DOCUMENTS sufficient to show any studies, surveys, reports, or analyses RELATING to YOUR marketing or sales of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 52

DOCUMENTS sufficient to show YOUR revenues or consideration received for the promotion of GENERATIVE AI TOOLS on YOUR website.

REQUEST FOR PRODUCTION No. 53

All DOCUMENTS CONCERNING the injury or other harm that YOU allegedly suffered due to Meta's alleged infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 54

DOCUMENTS sufficient to show any valuations of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 55

All DOCUMENTS evidencing a market for sale or license of YOUR ASSERTED WORKS, or derivations thereof, for purposes of training GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION No. 56

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to Meta's economic impact on YOUR business.

REQUEST FOR PRODUCTION No. 57

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to Meta's economic impact on YOUR ASSERTED WORKS and/or any markets for YOUR ASSERTED WORKS or derivations of the ASSERTED WORKS, including but not limited to any licensing or product markets.

REQUEST FOR PRODUCTION No. 58

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to any GENERATIVE AI TOOL'S economic impact on YOUR business.

REQUEST FOR PRODUCTION No. 59

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to any GENERATIVE AI TOOL's economic impact on the ASSERTED WORKS and/or any markets for the ASSERTED WORKS or derivations of the ASSERTED WORKS, including but not limited to any licensing or product markets.

REQUEST FOR PRODUCTION NO. 60

All DOCUMENTS that YOU may offer, use, or rely on to support any contention that there is a market for licensing the ASSERTED WORKS to train any LLM, including DOCUMENTS sufficient to identify that market, when and how it first developed, and the PERSONS involved, and any DOCUMENTS RELATING to the licensing or use of the ASSERTED WORKS in such market(s).

REQUEST FOR PRODUCTION NO. 61

All DOCUMENTS upon which YOU will rely to support any contention that Meta's use of the ASSERTED WORKS to train an LLM caused harm to any market for those works.

REQUEST FOR PRODUCTION NO. 62

All DOCUMENTS that YOU may offer, use, or rely on to support any contention that Meta's use of the ASSERTED WORKS to train any LLM was not a fair use under 17 U.S.C. § 107.

REQUEST FOR PRODUCTION NO. 63

DOCUMENTS sufficient to show any licensing, permissions, or consents given by YOU or on YOUR behalf to THIRD PARTIES CONCERNING the ASSERTED WORKS on or after January 1, 2015.

REQUEST FOR PRODUCTION NO. 64

DOCUMENTS sufficient to show prospective licensing opportunities for the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 65

All DOCUMENTS CONCERNING actual or prospective licensing of the ASSERTED WORKS to train a GENERATIVE AI TOOL.

REQUEST FOR PRODUCTION NO. 66

DOCUMENTS sufficient to show any agreements, contracts, or understandings between YOU on the one hand, and any entity or association owned, operated, or controlled by YOU with any title or any interest (e.g. ownership interest or security interest) in any of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 67

DOCUMENTS sufficient to identify any website, THIRD PARTY publication, social media account, or other print or digital media, of which YOU are aware, that (1) summarizes any of the ASSERTED WORKS; (2) reviews or criticizes any of the ASSERTED WORKS; (3) quotes from any of the ASSERTED WORKS; or (4) otherwise replicates more than 10 lines from any of the ASSERTED WORKS (but is not itself an ASSERTED WORK).

REQUEST FOR PRODUCTION NO. 68

DOCUMENTS sufficient to show each website and URL known to YOU at which any of the ASSERTED WORKS may be accessed for free by THIRD PARTIES.

REQUEST FOR PRODUCTION NO. 69

For each website and URL known to YOU at which any of the ASSERTED WORKS may be accessed by THIRD PARTIES for free and/or without YOUR authorization, DOCUMENTS sufficient to show any effort by YOU to have the ASSERTED WORK(S) removed from that website.

REQUEST FOR PRODUCTION NO. 70

DOCUMENTS sufficient to show any efforts undertaken by YOU on or after January 1, 2021, to enforce YOUR copyrights for any of the ASSERTED WORKS, or to monitor for or investigate infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 71

All DOCUMENTS CONCERNING any analyses by YOU of outputs created using META AI MODELS.

REQUEST FOR PRODUCTION NO. 72

All DOCUMENTS CONCERNING any analyses by YOU of outputs created using GENERATIVE AI TOOLS other than META AI MODELS.

REQUEST FOR PRODUCTION NO. 73

DOCUMENTS sufficient to show YOUR corporate organizational structure, including all parent companies, subsidiaries, affiliates, divisions, and trade names/DBAs, and the ownership and control relationships among them, for the period from January 1, 2022, to present. This request

1 includes current and historical versions, drafts, and any explanatory legends or accompanying
2 materials.

3 **REQUEST FOR PRODUCTION NO. 74**

4 All DOCUMENTS that any of YOUR testifying experts have relied on or considered in
5 forming any opinions in this ACTION.

6 **REQUEST FOR PRODUCTION NO. 75**

7 All DOCUMENTS that YOU may offer, use, or rely on at trial, for summary judgment, in
8 any deposition, or at any other hearing or proceeding in this ACTION.

9 **REQUEST FOR PRODUCTION NO. 76**

10 DOCUMENTS sufficient to show by name any THIRD PARTY who allegedly received
11 from Meta via TORRENTING any of YOUR ASSERTED WORKS.

12 **REQUEST FOR PRODUCTION NO. 77**

13 All DOCUMENTS YOU rely on to support YOUR allegation that any THIRD PARTY
14 received or downloaded YOUR ASSERTED WORKS from Meta.

15 **REQUEST FOR PRODUCTION NO. 78**

16 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
17 TORRENTING a complete READABLE copy of any of YOUR ASSERTED WORKS. Complete
18 means all pages of the ASSERTED WORK are present.

19 **REQUEST FOR PRODUCTION NO. 79**

20 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
21 TORRENTING a complete copy of any of YOUR ASSERTED WORKS. Complete means all
22 pages of the ASSERTED WORK are present.

23 **REQUEST FOR PRODUCTION NO. 80**

24 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
25 TORRENTING any READABLE portion or section of YOUR ASSERTED WORKS.

26 **REQUEST FOR PRODUCTION NO. 81**

27 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
28 TORRENTING any portion or section of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 82

DOCUMENTS sufficient to show which THIRD PARTIES, if any, read a copy of any of YOUR ASSERTED WORKS received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 83

DOCUMENTS sufficient to show whether and how each THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS later used that copy for any purpose, including but not limited to uses enumerated under 17 U.S.C. § 106.

REQUEST FOR PRODUCTION NO. 84

DOCUMENTS sufficient to show how many BitTorrent peers received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 85

For each THIRD PARTY YOU allege received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS, DOCUMENTS sufficient to show that the THIRD PARTY did not use that copy for a fair use purpose under 17 U.S.C. § 107.

REQUEST FOR PRODUCTION NO. 86

DOCUMENTS sufficient to show how (i.e. through what means) any THIRD PARTY downloaded from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 87

All COMMUNICATIONS between YOU and any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 88

DOCUMENTS sufficient to show which THIRD PARTIES displayed (as defined by the Copyright Act, 17 U.S.C. § 101) a copy of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 89

DOCUMENTS sufficient to show which THIRD PARTIES distributed a copy of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION No. 90

DOCUMENTS sufficient to show which THIRD PARTIES performed (as defined by the Copyright Act, 17 U.S.C. § 101) a copy of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION No. 91

DOCUMENTS sufficient to show which THIRD PARTIES reproduced YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION No. 92

DOCUMENTS sufficient to show which THIRD PARTIES created a derivative work of one of YOUR ASSERTED WORKS based on a copy they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION No. 93

DOCUMENTS sufficient to show which THIRD PARTIES made a fair use (as defined in 17 U.S.C. § 107) of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR PRODUCTION No. 94

DOCUMENTS sufficient to show all complete (i.e. the entirety of the work) copies of YOUR ASSERTED WORKS that YOU claim were distributed by Meta via TORRENTING to a THIRD PARTY.

REQUEST FOR PRODUCTION No. 95

DOCUMENTS sufficient to show how many complete (i.e. the entirety of the work) copies of YOUR ASSERTED WORKS YOU claim were distributed by Meta via TORRENTING to a THIRD PARTY.

REQUEST FOR PRODUCTION No. 96

DOCUMENTS sufficient to identify any instance of direct copyright infringement by a THIRD PARTY that allegedly received from Meta via TORRENTING a copy of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 97

All DOCUMENTS YOU intend to rely on to support YOUR claim that YOU lost any book sales because of the alleged distribution by Meta via TORRENTING of YOUR ASSERTED WORKS to a THIRD PARTY.

REQUEST FOR PRODUCTION NO. 98

Any DOCUMENTS YOU intend to rely on to support YOUR claim that YOU lost revenue as a result of the alleged distribution by Meta via TORRENTING of YOUR ASSERTED WORKS to a THIRD PARTY.

REQUEST FOR PRODUCTION NO. 99

All DOCUMENTS REFLECTING when and how YOU first became aware of Meta's alleged contributory infringement of each of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 100

DOCUMENTS sufficient to show YOUR efforts, or the efforts by those acting on YOUR behalf, to enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against anyone who has allegedly contributorily infringed YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 101

All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 102

All DOCUMENTS CONCERNING any lost sales or other lost opportunity that YOU allegedly suffered due to Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 103

All DOCUMENTS CONCERNING any lost sales or other lost opportunity that YOU allegedly suffered due to a THIRD PARTY's alleged direct infringement of YOUR ASSERTED WORKS, which that THIRD PARTY allegedly received from Meta via TORRENTING.

REQUEST FOR PRODUCTION NO. 104

All DOCUMENTS upon which YOU will rely to prove that a THIRD PARTY received from Meta via TORRENTING an entire copy or portion of any of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 105

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding Meta's alleged contributory infringement of one or more of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 106

All DOCUMENTS that any of YOUR testifying experts will rely on, have relied on, or have considered in forming any opinions in this ACTION CONCERNING Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 107

All DOCUMENTS RELATING to any efforts undertaken by YOU to monitor or investigate contributory infringement of one or more of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 108

All DOCUMENTS RELATING to any efforts undertaken by YOU to monitor or investigate direct infringement of one or more of YOUR ASSERTED WORKS by THIRD PARTIES.

REQUEST FOR PRODUCTION NO. 109

DOCUMENTS sufficient to show who YOU consider to be YOUR five biggest competitors for publication of books.

REQUEST FOR PRODUCTION NO. 110

All copies of THIRD PARTY reviews or criticisms of each of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 111

All DOCUMENTS and COMMUNICATIONS CONCERNING reviews or criticisms of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 112

All DOCUMENTS REFLECTING any analysis completed by YOU or on YOUR behalf regarding sales trends for YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 113

All DOCUMENTS REFLECTING any analysis completed by YOU or on YOUR behalf regarding demand for publications of books, including but not limited to analysis of YOUR biggest competition and alternative THIRD PARTY sources for such publications.

REQUEST FOR PRODUCTION NO. 114

DOCUMENTS sufficient to show by year the amount of money YOU spent on promoting or marketing each of the ASSERTED WORKS in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION NO. 115

DOCUMENTS sufficient to show each of the channels where each of the ASSERTED WORKS was marketed or promoted in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION NO. 116

DOCUMENTS sufficient to show each of the channels where each of the ASSERTED WORKS was sold or distributed in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION NO. 117

DOCUMENTS sufficient to show the media coverage for each of the ASSERTED WORKS by year in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION NO. 118

DOCUMENTS sufficient to show any price changes by year for each of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 119

DOCUMENTS sufficient to show any stock or supply issues for each of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 120

DOCUMENTS sufficient to show which of the ASSERTED WORKS have ever been available for purchase for audible consumption (e.g. audiobooks).

REQUEST FOR PRODUCTION NO. 121

All COMMUNICATIONS between YOU on the one hand, and any authors of the ASSERTED WORKS, RELATING to the sales performance of those ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 122

All DOCUMENTS sufficient to show any datasets or materials that YOU downloaded for use to evaluate, test, or deploy an AI model.

REQUEST FOR PRODUCTION NO. 123

All COMMUNICATIONS between YOU and any THIRD PARTY CONCERNING META AI MODELS.

REQUEST FOR PRODUCTION NO. 124

DOCUMENTS sufficient to show any studies, assessments, forecasts, or analyses regarding competing products, media formats, platforms, channels, or substitutes for YOUR publications.

REQUEST FOR PRODUCTION NO. 125

DOCUMENTS sufficient to show changes in consumer preferences, audience engagement, and media-consumption patterns for YOUR publications.

REQUEST FOR PRODUCTION NO. 126

DOCUMENTS sufficient to show which of YOUR ASSERTED WORKS may be reviewed, in whole or in part, for free (without a subscription or payment).

1 Dated: June 18, 2026

2
3 By: /s/ Jessica E. Phillips

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Attorneys for Defendant *Meta Platforms, Inc.*

PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of Virginia. 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 9th 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 FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF CAMBRONNE INC.**



(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.

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Executed on June 18, 2026, at Washington, D.C.

/s/ Jessica E. Phillips
Jessica E. Phillips

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Attorneys for Defendant *Meta Platforms, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC., *et al.*,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
PLAINTIFF JANE ADAMS**

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF JANE ADAMS

SET NUMBER: ONE (1)

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Jane Adams (“Jane Adams” or “Plaintiff”) produce the following documents and things within thirty (30) days of service of this First Set of Requests for Production (“Requests”) at the offices of Dunn Isaacson Rhee LLP, 401 9th Street NW, Washington, D.C. 20004 or via an electronic production (e.g. FTP transfer, LiquidFiles, or another mutually-agreeable means).

DEFINITIONS

The following terms shall have the following definitions and meanings, regardless of capitalization, unless another definition or meaning clearly appears from the context in which the term is used:

1. YOU, YOUR, or YOURS mean Plaintiff Jane Adams and all officers, directors, employees, agents, attorneys, and other persons acting or purporting to act on Plaintiff’s behalf.

2. ACTION means the lawsuit titled *Cambronne Inc., et al. v. Meta Platforms, Inc.*, Case No. 3:26-cv-03725-VC (N.D. Cal.).

3. COMPLAINT means the operative complaint against Meta in the ACTION.

4. ASSERTED WORKS means the literary works that YOU have alleged in the ACTION and/or COMPLAINT that Meta has allegedly infringed.

5. GENERATIVE AI TOOL means any artificial intelligence system capable of producing text, images, audio, video, or other audiovisual content (e.g., large language models and diffusion models), including but not limited to ChatGPT, Gemini, Claude, Meta.AI, and Llama—including any and all versions or models thereof—and any internal or proprietary system, tool, or platform with any such capabilities.

6. REGISTRATION MATERIALS means applications, certificates, deposits, correspondence, continuations, amendments, and communications with the U.S. Copyright Office for any ASSERTED WORK.

- 1 7. CMI means Copyright Management Information as defined in 17 U.S.C. § 1202(c).
- 2 8. LLM means a generative artificial intelligence (“AI”) large language model.
- 3 9. META AI MODELS shall mean any Meta generative AI models (e.g., Meta.AI,
- 4 Llama) that are the subject of YOUR COMPLAINT.
- 5 10. PERSON means any natural person or any business, legal, or governmental entity
- 6 or association or any other cognizable entity, including, without limitation, corporations,
- 7 proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations,
- 8 governmental agencies or instrumentalities, societies, and orders.
- 9 11. READABLE means a copy of a work that is in a form that can be perceived,
- 10 understood, or interpreted by humans.
- 11 12. THIRD PARTY means all PERSONS other than the named Parties to this ACTION.
- 12 13. TORRENTING is used in the same sense as it is used in Plaintiff’s Complaint, and
- 13 means a method of downloading and sharing files directly between users (peer-to-peer, or P2P)
- 14 over the internet, rather than downloading from a single, central server.
- 15 14. COMMUNICATION(S) is used in its broadest sense and means any transmission
- 16 of information from one PERSON or entity to another by any means, including without limitation
- 17 DOCUMENTS consisting of or containing written communications, telephone communications, in
- 18 person communications, email, texts, Slack, social media posts or messages, instant messaging, and
- 19 any other electronic communications.
- 20 15. DOCUMENT(S) means the original and all non-identical copies (including drafts
- 21 and those with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as
- 22 defined in Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil
- 23 Procedure 34, and includes papers of all kinds and electronically stored information, including by
- 24 way of example and without limitation, electronic mail, letters, communications, memoranda,
- 25 notes, computer generated data, calendars, records, minutes, studies, reports, notebooks, messages,
- 26 telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written
- 27 notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data,
- 28 source code, data compilation, pictures, photographs, books, pamphlets, publications,

1 advertisements, sales literature, brochures, manuals, price lists, announcements, and any other
2 writings, records, or tangible objects produced or reproduced mechanically, electrically,
3 electronically, photographically, or chemically. The term also includes any parent or child
4 attachment or other documents embedded or linked in any way to a requested DOCUMENT.

5 16. CONCERNING or REFERRING or RELATING or REFLECTING are used
6 interchangeably, shall be construed in the broadest possible manner, and shall mean constituting,
7 relating to, reflecting, regarding, memorializing, identifying, embodying, referring to, pertaining
8 to, commenting on, discussing, analyzing, considering, describing, containing, consisting of,
9 connected to, indicating, evidencing, supporting, or refuting.

10 **INSTRUCTIONS**

11 1. Wherever used herein: the singular shall include the plural and vice versa; verb
12 tenses shall be interpreted to include past, present, and future tenses; the word “all” includes the
13 word “any” and vice versa; and the terms “and” and “or” shall be construed either disjunctively or
14 conjunctively as necessary to bring within the scope of these Requests any DOCUMENTS that
15 might otherwise be construed to be outside their scope.

16 2. Wherever used herein, the term “including” shall be construed as including, but not
17 limited to, the referenced item(s), matter(s), or subject(s).

18 3. YOU must produce all DOCUMENTS in YOUR possession, custody, or control,
19 wherever located.

20 4. Each DOCUMENT must be produced as it is kept in the usual course of business,
21 including all file folders, binders, notebooks, data sharing systems and other devices by which such
22 papers, data, information or things may be organized, separated or stored. For example, a
23 DOCUMENT or thing that is part of a file, docket or other grouping should be physically produced
24 together with all other DOCUMENTS from said file, docket, or grouping, in the same order or
25 manner of arrangement.

26 5. DOCUMENTS should be produced in a form pursuant to a production protocol to
27 be agreed upon by the parties, in a form in which they are ordinarily maintained (e.g., native form),
28 or in a reasonably usable form (e.g., TIFF images with Relativity-compatible load files).

1 6. If any of the Requests cannot be responded to in full after exercising due diligence
2 to secure the information, respond to the extent possible, specifying YOUR inability to respond to
3 the remainder and stating whatever information YOU have CONCERNING the unanswered
4 portions.

5 7. If YOU object to all or any portion of a particular Request: (i) produce all
6 DOCUMENTS within the scope of the Request to which YOU do not object; and (ii) describe
7 whether—and to what extent—YOU have limited YOUR production of DOCUMENTS as a result
8 of YOUR objection(s).

9 8. If any DOCUMENT responsive to these Requests is withheld under a claim of
10 privilege, YOU must promptly comply with the requirements of Federal Rule of Civil Procedure
11 26(b)(5) and any other operative agreement between the parties as to each DOCUMENT for which
12 a claim of privilege or protection from discovery is made.

13 9. When a DOCUMENT contains both privileged and non-privileged material, the
14 non-privileged material must be disclosed to the fullest extent possible without disclosing the
15 privileged material. If a privilege is asserted with regard to part of the material contained in a
16 DOCUMENT, the party claiming the privilege must clearly indicate the portions as to which the
17 privilege is claimed. When a DOCUMENT has been redacted or altered in any fashion, YOU shall
18 identify as to each DOCUMENT the reason for the redaction or alteration, the date of the redaction
19 or alteration, and the individual performing the redaction or alteration. Any redaction must be
20 clearly visible on the redacted DOCUMENT.

21 10. If DOCUMENTS that fall within the scope of a Request were lost or destroyed after
22 this ACTION was filed: (i) describe the DOCUMENTS (type, subject matter, etc.) that have been
23 lost or destroyed; and (ii) explain the circumstances RELATING to the loss or destruction of such
24 DOCUMENTS.

25 11. If YOU have no DOCUMENTS that fall within the scope of a Request, please so
26 state in YOUR written response thereto.

27 12. These Requests are continuing in nature and YOUR responses to them are to be
28 promptly supplemented or amended if, after the time of YOUR initial responses, YOU learn that

any response is or has become in some material respect incomplete or incorrect, pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1

DOCUMENTS sufficient to show the REGISTRATION MATERIALS for each ASSERTED WORK, including but not limited to applications, deposits, certificates, and correspondence with the Copyright Office.

REQUEST FOR PRODUCTION NO. 2

DOCUMENTS sufficient to show any previous registration, new material included, or limitations identified in the REGISTRATION MATERIALS for any ASSERTED WORK, including, but not limited to, DOCUMENTS sufficient to show the extent of any new (as opposed to pre-existing) material in a particular edition of an ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 3

DOCUMENTS sufficient to show the chain of title for each ASSERTED WORK, including but not limited to any assignments and amendments thereto.

REQUEST FOR PRODUCTION NO. 4

DOCUMENTS sufficient to identify each PERSON who contributed written material to each ASSERTED WORK and the extent of their contributions.

REQUEST FOR PRODUCTION NO. 5

For each of the ASSERTED WORKS that is not a work made for hire (as that term is used and defined in 17 U.S.C. § 101), DOCUMENTS sufficient to show the basis for YOUR assertion of rights in the work, including, but not limited to, any agreement(s) or correspondence with the author of the work.

REQUEST FOR PRODUCTION NO. 6

DOCUMENTS sufficient to identify each literary work (by title and author) that YOU and/or any THIRD PARTY authors of the ASSERTED WORKS purchased, acquired, borrowed, referenced, or reviewed for purposes of researching, writing, or editing the ASSERTED WORKS, whether or not such works are identified as reference material in the ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 7

All DOCUMENTS CONCERNING any requests by YOU and/or any THIRD PARTY authors of the ASSERTED WORKS for permission to quote, reference, or otherwise use works written by THIRD PARTIES in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 8

All DOCUMENTS CONCERNING any licenses YOU have acquired to quote, reference, or otherwise use works written by THIRD PARTIES in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 9

All DOCUMENTS CONCERNING any complaints or allegations by THIRD PARTIES of plagiarism or copyright infringement in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 10

DOCUMENTS sufficient to show any written materials used in preparation of the ASSERTED WORKS, including notes and outlines.

REQUEST FOR PRODUCTION NO. 11

DOCUMENTS sufficient to identify any THIRD PARTY written materials relied upon or used as inspiration during the creation of any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 12

All DOCUMENTS between YOU and any PERSON CONCERNING any actual or potential claims against Meta, including direct COMMUNICATIONS, interviews, statements to the press, and social media posts.

REQUEST FOR PRODUCTION NO. 13

All DOCUMENTS between YOU and any PERSON CONCERNING actual or potential claims against developers of LLMs other than Meta, including direct COMMUNICATIONS, interviews, statements to the press, and social media posts.

REQUEST FOR PRODUCTION NO. 14

All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about Meta.

REQUEST FOR PRODUCTION No. 15

All COMMUNICATIONS between YOU and any PERSONS who contributed written material to the ASSERTED WORKS, CONCERNING this ACTION.

REQUEST FOR PRODUCTION No. 16

All DOCUMENTS produced or provided to YOU by THIRD PARTIES RELATING TO this ACTION.

REQUEST FOR PRODUCTION No. 17

All DOCUMENTS REFLECTING when and how YOU first became aware of Meta's alleged infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 18

All DOCUMENTS REFLECTING when and how YOU first became aware of the alleged infringement of the ASSERTED WORKS by THIRD PARTY developers of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION No. 19

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding Meta's alleged infringement of one or more of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 20

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding alleged infringement of one or more of the ASSERTED WORKS by THIRD PARTY developers of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION No. 21

All of YOUR COMMUNICATIONS with any THIRD PARTY CONCERNING META AI MODELS.

REQUEST FOR PRODUCTION No. 22

All DOCUMENTS CONCERNING YOUR allegations that Meta distributed any ASSERTED WORK, including but not limited to via TORRENTING or other peer-to-peer protocols, including any technical analyses and network logs.

REQUEST FOR PRODUCTION NO. 23

All DOCUMENTS CONCERNING YOUR allegations that Meta “induced” or “materially contributed” to THIRD PARTY infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 24

DOCUMENTS sufficient to show any GENERATIVE AI TOOLS that YOU have used, or that have been used on YOUR behalf, including, as applicable, the account username(s) for each such tool and the date the account was created.

REQUEST FOR PRODUCTION NO. 25

All DOCUMENTS CONCERNING any instances in which YOU approved the use of META AI MODELS by YOUR employees or contractors.

REQUEST FOR PRODUCTION NO. 26

DOCUMENTS sufficient to show any GENERATIVE AI TOOL tested or evaluated by YOU for use by YOUR employees or contractors, including, but not limited to, vendor contracts, non-disclosure agreements (NDAs), statements of work, or research reports or analyses.

REQUEST FOR PRODUCTION NO. 27

DOCUMENTS sufficient to show all GENERATIVE AI TOOLS incorporated into any offering provided to YOU, including, but not limited to AI ad generators.

REQUEST FOR PRODUCTION NO. 28

DOCUMENTS sufficient to show all business plans, analyses, assessments, roadmaps, research reports, or other studies CONCERNING YOUR incorporation of any GENERATIVE AI TOOLS into any offering provided by YOU.

REQUEST FOR PRODUCTION NO. 29

Copies of YOUR billing statements REFLECTING the amount YOU have paid for YOUR use of any LLM.

REQUEST FOR PRODUCTION NO. 30

DOCUMENTS sufficient to show any articles, blog posts, books, or other written works published by YOU that instruct on, promote, and/or otherwise condone the use of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 31

Copies of any articles, blog posts, books, or other written works published by YOU or otherwise displayed on YOUR website that were created using GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 32

DOCUMENTS sufficient to show articles, books, or other written works that YOU claim ownership of other than ASSERTED WORKS, and for which the subject matter is the same as or substantively equivalent to one or more of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 33

DOCUMENTS sufficient to show all of the ways in which YOU have monetized the ASSERTED WORKS, including but not limited to direct sales, subscriptions, and bundling.

REQUEST FOR PRODUCTION NO. 34

For each ASSERTED WORK, DOCUMENTS sufficient to show where and how one can download, read, or otherwise purchase the work.

REQUEST FOR PRODUCTION NO. 35

DOCUMENTS sufficient to show, between January 1, 2015, and the present, weekly sales volume and corresponding revenue, costs, and profits corresponding to the ASSERTED WORKS and separated by edition (e.g. hardcover, softcover) and channel (e.g., digital, print, etc.).

REQUEST FOR PRODUCTION NO. 36

DOCUMENTS sufficient to show, between January 1, 2015, and the present, monthly revenue, profit, and costs corresponding to any licensing of any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 37

DOCUMENTS sufficient to show, between January 1, 2015, and the present, monthly revenue, profit, and costs corresponding to any subscriptions that incorporate access to any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 38

For each of YOUR ASSERTED WORKS that is available via Kindle Unlimited or any other online subscriptions, DOCUMENTS sufficient to show, on a monthly basis, the number of readers for each work between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 39

For each of YOUR ASSERTED WORKS that is available via Kindle Unlimited or other online subscriptions, DOCUMENTS sufficient to show, on a monthly basis, Kindle Edition Normalized Pages tracking data between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 40

To the extent that YOU have made an ASSERTED WORK available to read on YOUR website or any website controlled by YOU (whether for a fee or for free), DOCUMENTS sufficient to show the number of daily visitors to the webpage containing the ASSERTED WORK between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 41

All DOCUMENTS CONCERNING any efforts by YOU on or after January 1, 2021, to make any of the ASSERTED WORKS, or portions thereof, available on the internet for free.

REQUEST FOR PRODUCTION NO. 42

DOCUMENTS sufficient to identify each instance on or after January 1, 2021, in which YOU provided free copies of any of the ASSERTED WORKS to THIRD PARTIES for purposes of soliciting reviews, commentary, criticism, endorsements, or summaries.

REQUEST FOR PRODUCTION NO. 43

DOCUMENTS sufficient to show any business plan, go-to-market plan, market analysis, study, assessment, or forecast, for each ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 44

DOCUMENTS sufficient to show any assessment or analysis of YOUR competition and/or competitors for the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 45

DOCUMENTS sufficient to show any studies, surveys, reports, or analyses RELATING to YOUR marketing or sales of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 46

DOCUMENTS sufficient to show YOUR revenues or consideration received for the promotion of GENERATIVE AI TOOLS on YOUR website.

REQUEST FOR PRODUCTION No. 47

All DOCUMENTS CONCERNING the injury or other harm that YOU allegedly suffered due to Meta's alleged infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 48

DOCUMENTS sufficient to show any valuations of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 49

All DOCUMENTS evidencing a market for sale or license of YOUR ASSERTED WORKS, or derivations thereof, for purposes of training GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION No. 50

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to Meta's economic impact on sales of YOUR ASSERTED WORKS or any lost revenue RELATING to YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 51

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to Meta's economic impact on YOUR ASSERTED WORKS and/or any markets for YOUR ASSERTED WORKS or derivations of the ASSERTED WORKS, including but not limited to any licensing or product markets.

REQUEST FOR PRODUCTION No. 52

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to any GENERATIVE AI TOOL's economic impact on sales of YOUR ASSERTED WORKS or any lost revenue RELATING to YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 53

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to any GENERATIVE AI TOOL's economic impact on the ASSERTED WORKS and/or any markets for the ASSERTED WORKS or derivations of the ASSERTED WORKS, including but not limited to any licensing or product markets.

REQUEST FOR PRODUCTION No. 54

1 All DOCUMENTS that YOU may offer, use, or rely on to support any contention that there
2 is a market for licensing the ASSERTED WORKS to train any LLM, including DOCUMENTS
3 sufficient to identify that market, when and how it first developed, and the PERSONS involved,
4 and any DOCUMENTS RELATING to the licensing or use of the ASSERTED WORKS in such
5 market(s).

6 **REQUEST FOR PRODUCTION NO. 55**

7 All DOCUMENTS upon which YOU will rely to support any contention that Meta's use of
8 the ASSERTED WORKS to train an LLM caused harm to any market for those works.

9 **REQUEST FOR PRODUCTION NO. 56**

10 All DOCUMENTS that YOU may offer, use, or rely on to support any contention that
11 Meta's use of the ASSERTED WORKS to train any LLM was not a fair use under 17 U.S.C. § 107.

12 **REQUEST FOR PRODUCTION NO. 57**

13 DOCUMENTS sufficient to show any licensing, permissions, or consents given by YOU
14 or on YOUR behalf to THIRD PARTIES CONCERNING the ASSERTED WORKS on or after
15 January 1, 2015.

16 **REQUEST FOR PRODUCTION NO. 58**

17 DOCUMENTS sufficient to show prospective licensing opportunities for the ASSERTED
18 WORKS.

19 **REQUEST FOR PRODUCTION NO. 59**

20 All DOCUMENTS CONCERNING actual or prospective licensing of the ASSERTED
21 WORKS to train a GENERATIVE AI TOOL.

22 **REQUEST FOR PRODUCTION NO. 60**

23 DOCUMENTS sufficient to show any agreements, contracts, or understandings between
24 YOU on the one hand, and any entity or association owned, operated, or controlled by YOU with
25 any title or any interest (e.g. ownership interest or security interest) in any of the ASSERTED
26 WORKS, on the other hand.

REQUEST FOR PRODUCTION NO. 61

DOCUMENTS sufficient to identify any website, THIRD PARTY publication, social media account, or other print or digital media, of which YOU are aware, that (1) summarizes any of the ASSERTED WORKS; (2) reviews or criticizes any of the ASSERTED WORKS; (3) quotes from any of the ASSERTED WORKS; or (4) otherwise replicates more than 10 lines from any of the ASSERTED WORKS (but is not itself an ASSERTED WORK).

REQUEST FOR PRODUCTION NO. 62

DOCUMENTS sufficient to show each website and URL known to YOU at which any of the ASSERTED WORKS may be accessed for free by THIRD PARTIES.

REQUEST FOR PRODUCTION NO. 63

For each website and URL known to YOU at which any of the ASSERTED WORKS may be accessed by THIRD PARTIES for free and/or without YOUR authorization, DOCUMENTS sufficient to show any effort by YOU to have the ASSERTED WORK(S) removed from that website.

REQUEST FOR PRODUCTION NO. 64

DOCUMENTS sufficient to show any efforts undertaken by YOU on or after January 1, 2021, to enforce YOUR copyrights for any of the ASSERTED WORKS, or to monitor for or investigate infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 65

All DOCUMENTS CONCERNING any analyses by YOU of outputs created using META AI MODELS.

REQUEST FOR PRODUCTION NO. 66

All DOCUMENTS CONCERNING any analyses by YOU of outputs created using GENERATIVE AI TOOLS other than META AI MODELS.

REQUEST FOR PRODUCTION NO. 67

All DOCUMENTS that any of YOUR testifying experts have relied on or considered in forming any opinions in this ACTION.

REQUEST FOR PRODUCTION NO. 68

1 All DOCUMENTS that YOU may offer, use, or rely on at trial, for summary judgment, in
2 any deposition, or at any other hearing or proceeding in this ACTION.

3 **REQUEST FOR PRODUCTION NO. 69**

4 DOCUMENTS sufficient to show by name any THIRD PARTY who allegedly received
5 from Meta via TORRENTING any of YOUR ASSERTED WORKS.

6 **REQUEST FOR PRODUCTION NO. 70**

7 All DOCUMENTS YOU rely on to support YOUR allegation that any THIRD PARTY
8 received or downloaded YOUR ASSERTED WORKS from Meta.

9 **REQUEST FOR PRODUCTION NO. 71**

10 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
11 TORRENTING a complete READABLE copy of any of YOUR ASSERTED WORKS. Complete
12 means all pages of the ASSERTED WORK are present.

13 **REQUEST FOR PRODUCTION NO. 72**

14 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
15 TORRENTING a complete copy of any of YOUR ASSERTED WORKS. Complete means all
16 pages of the ASSERTED WORK are present.

17 **REQUEST FOR PRODUCTION NO. 73**

18 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
19 TORRENTING any READABLE portion or section of YOUR ASSERTED WORKS.

20 **REQUEST FOR PRODUCTION NO. 74**

21 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
22 TORRENTING any portion or section of YOUR ASSERTED WORKS.

23 **REQUEST FOR PRODUCTION NO. 75**

24 DOCUMENTS sufficient to show which THIRD PARTIES, if any, read a copy of any of
25 YOUR ASSERTED WORKS received from Meta via TORRENTING.

26 **REQUEST FOR PRODUCTION NO. 76**

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28

1 DOCUMENTS sufficient to show whether and how each THIRD PARTY who allegedly
2 received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS later used
3 that copy for any purpose, including but not limited to uses enumerated under 17 U.S.C. § 106.

4 **REQUEST FOR PRODUCTION No. 77**

5 DOCUMENTS sufficient to show how many BitTorrent peers received from Meta via
6 TORRENTING a copy of one of YOUR ASSERTED WORKS.

7 **REQUEST FOR PRODUCTION No. 78**

8 For each THIRD PARTY YOU allege received from Meta via TORRENTING a copy of
9 any of YOUR ASSERTED WORKS, DOCUMENTS sufficient to show that the THIRD PARTY
10 did not use that copy for a fair use purpose under 17 U.S.C. § 107.

11 **REQUEST FOR PRODUCTION No. 79**

12 DOCUMENTS sufficient to show how (i.e. through what means) any THIRD PARTY
13 downloaded from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

14 **REQUEST FOR PRODUCTION No. 80**

15 All COMMUNICATIONS between YOU and any THIRD PARTY who received from
16 Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

17 **REQUEST FOR PRODUCTION No. 81**

18 DOCUMENTS sufficient to show which THIRD PARTIES displayed (as defined by the
19 Copyright Act, 17 U.S.C. § 101) a copy of YOUR ASSERTED WORKS that they received from
20 Meta via TORRENTING.

21 **REQUEST FOR PRODUCTION No. 82**

22 DOCUMENTS sufficient to show which THIRD PARTIES distributed a copy of YOUR
23 ASSERTED WORKS that they received from Meta via TORRENTING.

24 **REQUEST FOR PRODUCTION No. 83**

25 DOCUMENTS sufficient to show which THIRD PARTIES performed (as defined by the
26 Copyright Act, 17 U.S.C. § 101) a copy of YOUR ASSERTED WORKS that they received from
27 Meta via TORRENTING.

28 **REQUEST FOR PRODUCTION No. 84**

1 DOCUMENTS sufficient to show which THIRD PARTIES reproduced YOUR
2 ASSERTED WORKS that they received from Meta via TORRENTING.

3 **REQUEST FOR PRODUCTION No. 85**

4 DOCUMENTS sufficient to show which THIRD PARTIES created a derivative work of
5 one of YOUR ASSERTED WORKS based on a copy they received from Meta via TORRENTING.

6 **REQUEST FOR PRODUCTION No. 86**

7 DOCUMENTS sufficient to show which THIRD PARTIES made a fair use (as defined in
8 17 U.S.C. § 107) of YOUR ASSERTED WORKS that they received from Meta via
9 TORRENTING.

10 **REQUEST FOR PRODUCTION No. 87**

11 DOCUMENTS sufficient to show all complete (i.e. the entirety of the work) copies of
12 YOUR ASSERTED WORKS that YOU claim were distributed by Meta via TORRENTING to a
13 THIRD PARTY.

14 **REQUEST FOR PRODUCTION No. 88**

15 DOCUMENTS sufficient to show how many complete (i.e. the entirety of the work) copies
16 of YOUR ASSERTED WORKS YOU claim were distributed by Meta via TORRENTING to a
17 THIRD PARTY.

18 **REQUEST FOR PRODUCTION No. 89**

19 DOCUMENTS sufficient to identify any instance of direct copyright infringement by a
20 THIRD PARTY that allegedly received from Meta via TORRENTING a copy of YOUR
21 ASSERTED WORKS.

22 **REQUEST FOR PRODUCTION No. 90**

23 All DOCUMENTS YOU intend to rely on to support YOUR claim that YOU lost any book
24 sales because of the alleged distribution by Meta via TORRENTING of YOUR ASSERTED
25 WORKS to a THIRD PARTY.

26 **REQUEST FOR PRODUCTION No. 91**

1 Any DOCUMENTS YOU intend to rely on to support YOUR claim that YOU lost revenue
2 as a result of the alleged distribution by Meta via TORRENTING of YOUR ASSERTED WORKS
3 to a THIRD PARTY.

4 **REQUEST FOR PRODUCTION No. 92**

5 All DOCUMENTS REFLECTING when and how YOU first became aware of Meta's
6 alleged contributory infringement of each of YOUR ASSERTED WORKS.

7 **REQUEST FOR PRODUCTION No. 93**

8 DOCUMENTS sufficient to show YOUR efforts, or the efforts by those acting on YOUR
9 behalf, to enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against
10 anyone who has allegedly contributorily infringed YOUR ASSERTED WORKS.

11 **REQUEST FOR PRODUCTION No. 94**

12 All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of
13 Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

14 **REQUEST FOR PRODUCTION No. 95**

15 All DOCUMENTS CONCERNING any lost sales or other lost opportunity that YOU
16 allegedly suffered due to Meta's alleged contributory infringement of YOUR ASSERTED
17 WORKS.

18 **REQUEST FOR PRODUCTION No. 96**

19 All DOCUMENTS CONCERNING any lost sales or other lost opportunity that YOU
20 allegedly suffered due to a THIRD PARTY's alleged direct infringement of YOUR ASSERTED
21 WORKS, which that THIRD PARTY allegedly received from Meta via TORRENTING.

22 **REQUEST FOR PRODUCTION No. 97**

23 All DOCUMENTS upon which YOU will rely to prove that a THIRD PARTY received
24 from Meta via TORRENTING an entire copy or portion of any of YOUR ASSERTED WORKS.

25 **REQUEST FOR PRODUCTION No. 98**

26 All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted
27 by YOU or on YOUR behalf regarding Meta's alleged contributory infringement of one or more
28 of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 99

All DOCUMENTS that any of YOUR testifying experts will rely on, have relied on, or have considered in forming any opinions in this ACTION CONCERNING Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 100

All DOCUMENTS RELATING to any efforts undertaken by YOU to monitor or investigate contributory infringement of one or more of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 101

All DOCUMENTS RELATING to any efforts undertaken by YOU to monitor or investigate direct infringement of one or more of YOUR ASSERTED WORKS by THIRD PARTIES.

REQUEST FOR PRODUCTION No. 102

All copies of THIRD PARTY reviews or criticisms of each of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 103

All DOCUMENTS and COMMUNICATIONS CONCERNING reviews or criticisms of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 104

All DOCUMENTS REFLECTING any analysis completed by YOU or on YOUR behalf regarding sales trends for YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 105

DOCUMENTS sufficient to show by year the amount of money YOU spent on promoting or marketing each of the ASSERTED WORKS in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION No. 106

DOCUMENTS sufficient to show each of the channels where each of the ASSERTED WORKS was marketed or promoted in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION No. 107

DOCUMENTS sufficient to show each of the channels where each of the ASSERTED WORKS was sold or distributed in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION NO. 108

DOCUMENTS sufficient to show the media coverage for each of the ASSERTED WORKS by year in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION NO. 109

DOCUMENTS sufficient to show any price changes by year for each of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 110

DOCUMENTS sufficient to show any stock or supply issues for each of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 111

DOCUMENTS sufficient to show which of the ASSERTED WORKS have ever been available for purchase for audible consumption (e.g. audiobooks).

REQUEST FOR PRODUCTION NO. 112

All COMMUNICATIONS between YOU on the one hand, and any authors of the ASSERTED WORKS, RELATING to the sales performance of those ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 113

All DOCUMENTS sufficient to show any datasets or materials that YOU downloaded for use to evaluate, test, or deploy an AI model.

REQUEST FOR PRODUCTION NO. 114

All COMMUNICATIONS between YOU and any THIRD PARTY CONCERNING META AI MODELS.

REQUEST FOR PRODUCTION NO. 115

DOCUMENTS sufficient to show any studies, assessments, forecasts, or analyses regarding competing products, media formats, platforms, channels, or substitutes for YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 116

DOCUMENTS sufficient to show changes in consumer preferences, audience engagement, and media-consumption patterns for YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 117

DOCUMENTS sufficient to show which of YOUR ASSERTED WORKS may be reviewed, in whole or in part, for free (without a subscription or payment).

1 Dated: June 18, 2026

2
3 By:/s/ Jessica E. Phillips

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Attorneys for Defendant *Meta Platforms, Inc.*

PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of Virginia. 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 9th 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 FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF JANE ADAMS**



(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.

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Executed on June 18, 2026, at Washington, D.C.

/s/ Jessica E. Phillips
Jessica E. Phillips

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Attorneys for Defendant *Meta Platforms, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC., *et al.*,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
PLAINTIFF LISA BARRETTA**

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF LISA BARRETTA

SET NUMBER: ONE (1)

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Lisa Barretta (“Lisa Barretta” or “Plaintiff”) produce the following documents and things within thirty (30) days of service of this First Set of Requests for Production (“Requests”) at the offices of Dunn Isaacson Rhee LLP, 401 9th Street NW, Washington, D.C. 20004 or via an electronic production (e.g. FTP transfer, LiquidFiles, or another mutually-agreeable means).

DEFINITIONS

The following terms shall have the following definitions and meanings, regardless of capitalization, unless another definition or meaning clearly appears from the context in which the term is used:

1. YOU, YOUR, or YOURS mean Plaintiff Lisa Barretta and all officers, directors, employees, agents, attorneys, and other persons acting or purporting to act on Plaintiff’s behalf.
2. ACTION means the lawsuit titled *Cambronne Inc., et al. v. Meta Platforms, Inc.*, Case No. 3:26-cv-03725-VC (N.D. Cal.).
3. COMPLAINT means the operative complaint against Meta in the ACTION.
4. ASSERTED WORKS means the literary works that YOU have alleged in the ACTION and/or COMPLAINT that Meta has allegedly infringed.
5. GENERATIVE AI TOOL means any artificial intelligence system capable of producing text, images, audio, video, or other audiovisual content (e.g., large language models and diffusion models), including but not limited to ChatGPT, Gemini, Claude, Meta.AI, and Llama—including any and all versions or models thereof—and any internal or proprietary system, tool, or platform with any such capabilities.
6. REGISTRATION MATERIALS means applications, certificates, deposits, correspondence, continuations, amendments, and communications with the U.S. Copyright Office for any ASSERTED WORK.

- 1 7. CMI means Copyright Management Information as defined in 17 U.S.C. § 1202(c).
- 2 8. LLM means a generative artificial intelligence (“AI”) large language model.
- 3 9. META AI MODELS shall mean any Meta generative AI models (e.g., Meta.AI,
- 4 Llama) that are the subject of YOUR COMPLAINT.
- 5 10. PERSON means any natural person or any business, legal, or governmental entity
- 6 or association or any other cognizable entity, including, without limitation, corporations,
- 7 proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations,
- 8 governmental agencies or instrumentalities, societies, and orders.
- 9 11. READABLE means a copy of a work that is in a form that can be perceived,
- 10 understood, or interpreted by humans.
- 11 12. THIRD PARTY means all PERSONS other than the named Parties to this ACTION.
- 12 13. TORRENTING is used in the same sense as it is used in Plaintiff’s Complaint, and
- 13 means a method of downloading and sharing files directly between users (peer-to-peer, or P2P)
- 14 over the internet, rather than downloading from a single, central server.
- 15 14. COMMUNICATION(S) is used in its broadest sense and means any transmission
- 16 of information from one PERSON or entity to another by any means, including without limitation
- 17 DOCUMENTS consisting of or containing written communications, telephone communications, in
- 18 person communications, email, texts, Slack, social media posts or messages, instant messaging, and
- 19 any other electronic communications.
- 20 15. DOCUMENT(S) means the original and all non-identical copies (including drafts
- 21 and those with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as
- 22 defined in Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil
- 23 Procedure 34, and includes papers of all kinds and electronically stored information, including by
- 24 way of example and without limitation, electronic mail, letters, communications, memoranda,
- 25 notes, computer generated data, calendars, records, minutes, studies, reports, notebooks, messages,
- 26 telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written
- 27 notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data,
- 28 source code, data compilation, pictures, photographs, books, pamphlets, publications,

1 advertisements, sales literature, brochures, manuals, price lists, announcements, and any other
2 writings, records, or tangible objects produced or reproduced mechanically, electrically,
3 electronically, photographically, or chemically. The term also includes any parent or child
4 attachment or other documents embedded or linked in any way to a requested DOCUMENT.

5 16. CONCERNING or REFERRING or RELATING or REFLECTING are used
6 interchangeably, shall be construed in the broadest possible manner, and shall mean constituting,
7 relating to, reflecting, regarding, memorializing, identifying, embodying, referring to, pertaining
8 to, commenting on, discussing, analyzing, considering, describing, containing, consisting of,
9 connected to, indicating, evidencing, supporting, or refuting.

10 **INSTRUCTIONS**

11 1. Wherever used herein: the singular shall include the plural and vice versa; verb
12 tenses shall be interpreted to include past, present, and future tenses; the word “all” includes the
13 word “any” and vice versa; and the terms “and” and “or” shall be construed either disjunctively or
14 conjunctively as necessary to bring within the scope of these Requests any DOCUMENTS that
15 might otherwise be construed to be outside their scope.

16 2. Wherever used herein, the term “including” shall be construed as including, but not
17 limited to, the referenced item(s), matter(s), or subject(s).

18 3. YOU must produce all DOCUMENTS in YOUR possession, custody, or control,
19 wherever located.

20 4. Each DOCUMENT must be produced as it is kept in the usual course of business,
21 including all file folders, binders, notebooks, data sharing systems and other devices by which such
22 papers, data, information or things may be organized, separated or stored. For example, a
23 DOCUMENT or thing that is part of a file, docket or other grouping should be physically produced
24 together with all other DOCUMENTS from said file, docket, or grouping, in the same order or
25 manner of arrangement.

26 5. DOCUMENTS should be produced in a form pursuant to a production protocol to
27 be agreed upon by the parties, in a form in which they are ordinarily maintained (e.g., native form),
28 or in a reasonably usable form (e.g., TIFF images with Relativity-compatible load files).

1 6. If any of the Requests cannot be responded to in full after exercising due diligence
2 to secure the information, respond to the extent possible, specifying YOUR inability to respond to
3 the remainder and stating whatever information YOU have CONCERNING the unanswered
4 portions.

5 7. If YOU object to all or any portion of a particular Request: (i) produce all
6 DOCUMENTS within the scope of the Request to which YOU do not object; and (ii) describe
7 whether—and to what extent—YOU have limited YOUR production of DOCUMENTS as a result
8 of YOUR objection(s).

9 8. If any DOCUMENT responsive to these Requests is withheld under a claim of
10 privilege, YOU must promptly comply with the requirements of Federal Rule of Civil Procedure
11 26(b)(5) and any other operative agreement between the parties as to each DOCUMENT for which
12 a claim of privilege or protection from discovery is made.

13 9. When a DOCUMENT contains both privileged and non-privileged material, the
14 non-privileged material must be disclosed to the fullest extent possible without disclosing the
15 privileged material. If a privilege is asserted with regard to part of the material contained in a
16 DOCUMENT, the party claiming the privilege must clearly indicate the portions as to which the
17 privilege is claimed. When a DOCUMENT has been redacted or altered in any fashion, YOU shall
18 identify as to each DOCUMENT the reason for the redaction or alteration, the date of the redaction
19 or alteration, and the individual performing the redaction or alteration. Any redaction must be
20 clearly visible on the redacted DOCUMENT.

21 10. If DOCUMENTS that fall within the scope of a Request were lost or destroyed after
22 this ACTION was filed: (i) describe the DOCUMENTS (type, subject matter, etc.) that have been
23 lost or destroyed; and (ii) explain the circumstances RELATING to the loss or destruction of such
24 DOCUMENTS.

25 11. If YOU have no DOCUMENTS that fall within the scope of a Request, please so
26 state in YOUR written response thereto.

27 12. These Requests are continuing in nature and YOUR responses to them are to be
28 promptly supplemented or amended if, after the time of YOUR initial responses, YOU learn that

any response is or has become in some material respect incomplete or incorrect, pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1

DOCUMENTS sufficient to show the REGISTRATION MATERIALS for each ASSERTED WORK, including but not limited to applications, deposits, certificates, and correspondence with the Copyright Office.

REQUEST FOR PRODUCTION NO. 2

DOCUMENTS sufficient to show any previous registration, new material included, or limitations identified in the REGISTRATION MATERIALS for any ASSERTED WORK, including, but not limited to, DOCUMENTS sufficient to show the extent of any new (as opposed to pre-existing) material in a particular edition of an ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 3

DOCUMENTS sufficient to show the chain of title for each ASSERTED WORK, including but not limited to any assignments and amendments thereto.

REQUEST FOR PRODUCTION NO. 4

DOCUMENTS sufficient to identify each PERSON who contributed written material to each ASSERTED WORK and the extent of their contributions.

REQUEST FOR PRODUCTION NO. 5

For each of the ASSERTED WORKS that is not a work made for hire (as that term is used and defined in 17 U.S.C. § 101), DOCUMENTS sufficient to show the basis for YOUR assertion of rights in the work, including, but not limited to, any agreement(s) or correspondence with the author of the work.

REQUEST FOR PRODUCTION NO. 6

DOCUMENTS sufficient to identify each literary work (by title and author) that YOU and/or any THIRD PARTY authors of the ASSERTED WORKS purchased, acquired, borrowed, referenced, or reviewed for purposes of researching, writing, or editing the ASSERTED WORKS, whether or not such works are identified as reference material in the ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 7

All DOCUMENTS CONCERNING any requests by YOU and/or any THIRD PARTY authors of the ASSERTED WORKS for permission to quote, reference, or otherwise use works written by THIRD PARTIES in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 8

All DOCUMENTS CONCERNING any licenses YOU have acquired to quote, reference, or otherwise use works written by THIRD PARTIES in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 9

All DOCUMENTS CONCERNING any complaints or allegations by THIRD PARTIES of plagiarism or copyright infringement in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 10

DOCUMENTS sufficient to show any written materials used in preparation of the ASSERTED WORKS, including notes and outlines.

REQUEST FOR PRODUCTION NO. 11

DOCUMENTS sufficient to identify any THIRD PARTY written materials relied upon or used as inspiration during the creation of any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 12

All DOCUMENTS between YOU and any PERSON CONCERNING any actual or potential claims against Meta, including direct COMMUNICATIONS, interviews, statements to the press, and social media posts.

REQUEST FOR PRODUCTION NO. 13

All DOCUMENTS between YOU and any PERSON CONCERNING actual or potential claims against developers of LLMs other than Meta, including direct COMMUNICATIONS, interviews, statements to the press, and social media posts.

REQUEST FOR PRODUCTION NO. 14

All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about Meta.

REQUEST FOR PRODUCTION No. 15

All COMMUNICATIONS between YOU and any PERSONS who contributed written material to the ASSERTED WORKS, CONCERNING this ACTION.

REQUEST FOR PRODUCTION No. 16

All DOCUMENTS produced or provided to YOU by THIRD PARTIES RELATING TO this ACTION.

REQUEST FOR PRODUCTION No. 17

All DOCUMENTS REFLECTING when and how YOU first became aware of Meta's alleged infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 18

All DOCUMENTS REFLECTING when and how YOU first became aware of the alleged infringement of the ASSERTED WORKS by THIRD PARTY developers of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION No. 19

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding Meta's alleged infringement of one or more of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 20

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding alleged infringement of one or more of the ASSERTED WORKS by THIRD PARTY developers of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION No. 21

All of YOUR COMMUNICATIONS with any THIRD PARTY CONCERNING META AI MODELS.

REQUEST FOR PRODUCTION No. 22

All DOCUMENTS CONCERNING YOUR allegations that Meta distributed any ASSERTED WORK, including but not limited to via TORRENTING or other peer-to-peer protocols, including any technical analyses and network logs.

REQUEST FOR PRODUCTION NO. 23

All DOCUMENTS CONCERNING YOUR allegations that Meta “induced” or “materially contributed” to THIRD PARTY infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 24

DOCUMENTS sufficient to show any GENERATIVE AI TOOLS that YOU have used, or that have been used on YOUR behalf, including, as applicable, the account username(s) for each such tool and the date the account was created.

REQUEST FOR PRODUCTION NO. 25

All DOCUMENTS CONCERNING any instances in which YOU approved the use of META AI MODELS by YOUR employees or contractors.

REQUEST FOR PRODUCTION NO. 26

DOCUMENTS sufficient to show any GENERATIVE AI TOOL tested or evaluated by YOU for use by YOUR employees or contractors, including, but not limited to, vendor contracts, non-disclosure agreements (NDAs), statements of work, or research reports or analyses.

REQUEST FOR PRODUCTION NO. 27

DOCUMENTS sufficient to show all GENERATIVE AI TOOLS incorporated into any offering provided to YOU, including, but not limited to AI ad generators.

REQUEST FOR PRODUCTION NO. 28

DOCUMENTS sufficient to show all business plans, analyses, assessments, roadmaps, research reports, or other studies CONCERNING YOUR incorporation of any GENERATIVE AI TOOLS into any offering provided by YOU.

REQUEST FOR PRODUCTION NO. 29

Copies of YOUR billing statements REFLECTING the amount YOU have paid for YOUR use of any LLM.

REQUEST FOR PRODUCTION NO. 30

DOCUMENTS sufficient to show any articles, blog posts, books, or other written works published by YOU that instruct on, promote, and/or otherwise condone the use of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 31

Copies of any articles, blog posts, books, or other written works published by YOU or otherwise displayed on YOUR website that were created using GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 32

DOCUMENTS sufficient to show articles, books, or other written works that YOU claim ownership of other than ASSERTED WORKS, and for which the subject matter is the same as or substantively equivalent to one or more of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 33

DOCUMENTS sufficient to show all of the ways in which YOU have monetized the ASSERTED WORKS, including but not limited to direct sales, subscriptions, and bundling.

REQUEST FOR PRODUCTION NO. 34

For each ASSERTED WORK, DOCUMENTS sufficient to show where and how one can download, read, or otherwise purchase the work.

REQUEST FOR PRODUCTION NO. 35

DOCUMENTS sufficient to show, between January 1, 2015, and the present, weekly sales volume and corresponding revenue, costs, and profits corresponding to the ASSERTED WORKS and separated by edition (e.g. hardcover, softcover) and channel (e.g., digital, print, etc.).

REQUEST FOR PRODUCTION NO. 36

DOCUMENTS sufficient to show, between January 1, 2015, and the present, monthly revenue, profit, and costs corresponding to any licensing of any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 37

DOCUMENTS sufficient to show, between January 1, 2015, and the present, monthly revenue, profit, and costs corresponding to any subscriptions that incorporate access to any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 38

For each of YOUR ASSERTED WORKS that is available via Kindle Unlimited or any other online subscriptions, DOCUMENTS sufficient to show, on a monthly basis, the number of readers for each work between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 39

For each of YOUR ASSERTED WORKS that is available via Kindle Unlimited or other online subscriptions, DOCUMENTS sufficient to show, on a monthly basis, Kindle Edition Normalized Pages tracking data between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 40

To the extent that YOU have made an ASSERTED WORK available to read on YOUR website or any website controlled by YOU (whether for a fee or for free), DOCUMENTS sufficient to show the number of daily visitors to the webpage containing the ASSERTED WORK between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 41

All DOCUMENTS CONCERNING any efforts by YOU on or after January 1, 2021, to make any of the ASSERTED WORKS, or portions thereof, available on the internet for free.

REQUEST FOR PRODUCTION NO. 42

DOCUMENTS sufficient to identify each instance on or after January 1, 2021, in which YOU provided free copies of any of the ASSERTED WORKS to THIRD PARTIES for purposes of soliciting reviews, commentary, criticism, endorsements, or summaries.

REQUEST FOR PRODUCTION NO. 43

DOCUMENTS sufficient to show any business plan, go-to-market plan, market analysis, study, assessment, or forecast, for each ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 44

DOCUMENTS sufficient to show any assessment or analysis of YOUR competition and/or competitors for the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 45

DOCUMENTS sufficient to show any studies, surveys, reports, or analyses RELATING to YOUR marketing or sales of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 46

DOCUMENTS sufficient to show YOUR revenues or consideration received for the promotion of GENERATIVE AI TOOLS on YOUR website.

REQUEST FOR PRODUCTION No. 47

All DOCUMENTS CONCERNING the injury or other harm that YOU allegedly suffered due to Meta's alleged infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 48

DOCUMENTS sufficient to show any valuations of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 49

All DOCUMENTS evidencing a market for sale or license of YOUR ASSERTED WORKS, or derivations thereof, for purposes of training GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION No. 50

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to Meta's economic impact on sales of YOUR ASSERTED WORKS or any lost revenue RELATING to YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 51

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to Meta's economic impact on YOUR ASSERTED WORKS and/or any markets for YOUR ASSERTED WORKS or derivations of the ASSERTED WORKS, including but not limited to any licensing or product markets.

REQUEST FOR PRODUCTION No. 52

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to any GENERATIVE AI TOOL's economic impact on sales of YOUR ASSERTED WORKS or any lost revenue RELATING to YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 53

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to any GENERATIVE AI TOOL's economic impact on the ASSERTED WORKS and/or any markets for the ASSERTED WORKS or derivations of the ASSERTED WORKS, including but not limited to any licensing or product markets.

REQUEST FOR PRODUCTION No. 54

1 All DOCUMENTS that YOU may offer, use, or rely on to support any contention that there
2 is a market for licensing the ASSERTED WORKS to train any LLM, including DOCUMENTS
3 sufficient to identify that market, when and how it first developed, and the PERSONS involved,
4 and any DOCUMENTS RELATING to the licensing or use of the ASSERTED WORKS in such
5 market(s).

6 **REQUEST FOR PRODUCTION NO. 55**

7 All DOCUMENTS upon which YOU will rely to support any contention that Meta's use of
8 the ASSERTED WORKS to train an LLM caused harm to any market for those works.

9 **REQUEST FOR PRODUCTION NO. 56**

10 All DOCUMENTS that YOU may offer, use, or rely on to support any contention that
11 Meta's use of the ASSERTED WORKS to train any LLM was not a fair use under 17 U.S.C. § 107.

12 **REQUEST FOR PRODUCTION NO. 57**

13 DOCUMENTS sufficient to show any licensing, permissions, or consents given by YOU
14 or on YOUR behalf to THIRD PARTIES CONCERNING the ASSERTED WORKS on or after
15 January 1, 2015.

16 **REQUEST FOR PRODUCTION NO. 58**

17 DOCUMENTS sufficient to show prospective licensing opportunities for the ASSERTED
18 WORKS.

19 **REQUEST FOR PRODUCTION NO. 59**

20 All DOCUMENTS CONCERNING actual or prospective licensing of the ASSERTED
21 WORKS to train a GENERATIVE AI TOOL.

22 **REQUEST FOR PRODUCTION NO. 60**

23 DOCUMENTS sufficient to show any agreements, contracts, or understandings between
24 YOU on the one hand, and any entity or association owned, operated, or controlled by YOU with
25 any title or any interest (e.g. ownership interest or security interest) in any of the ASSERTED
26 WORKS, on the other hand.

REQUEST FOR PRODUCTION NO. 61

DOCUMENTS sufficient to identify any website, THIRD PARTY publication, social media account, or other print or digital media, of which YOU are aware, that (1) summarizes any of the ASSERTED WORKS; (2) reviews or criticizes any of the ASSERTED WORKS; (3) quotes from any of the ASSERTED WORKS; or (4) otherwise replicates more than 10 lines from any of the ASSERTED WORKS (but is not itself an ASSERTED WORK).

REQUEST FOR PRODUCTION NO. 62

DOCUMENTS sufficient to show each website and URL known to YOU at which any of the ASSERTED WORKS may be accessed for free by THIRD PARTIES.

REQUEST FOR PRODUCTION NO. 63

For each website and URL known to YOU at which any of the ASSERTED WORKS may be accessed by THIRD PARTIES for free and/or without YOUR authorization, DOCUMENTS sufficient to show any effort by YOU to have the ASSERTED WORK(S) removed from that website.

REQUEST FOR PRODUCTION NO. 64

DOCUMENTS sufficient to show any efforts undertaken by YOU on or after January 1, 2021, to enforce YOUR copyrights for any of the ASSERTED WORKS, or to monitor for or investigate infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 65

All DOCUMENTS CONCERNING any analyses by YOU of outputs created using META AI MODELS.

REQUEST FOR PRODUCTION NO. 66

All DOCUMENTS CONCERNING any analyses by YOU of outputs created using GENERATIVE AI TOOLS other than META AI MODELS.

REQUEST FOR PRODUCTION NO. 67

All DOCUMENTS that any of YOUR testifying experts have relied on or considered in forming any opinions in this ACTION.

REQUEST FOR PRODUCTION NO. 68

1 All DOCUMENTS that YOU may offer, use, or rely on at trial, for summary judgment, in
2 any deposition, or at any other hearing or proceeding in this ACTION.

3 **REQUEST FOR PRODUCTION NO. 69**

4 DOCUMENTS sufficient to show by name any THIRD PARTY who allegedly received
5 from Meta via TORRENTING any of YOUR ASSERTED WORKS.

6 **REQUEST FOR PRODUCTION NO. 70**

7 All DOCUMENTS YOU rely on to support YOUR allegation that any THIRD PARTY
8 received or downloaded YOUR ASSERTED WORKS from Meta.

9 **REQUEST FOR PRODUCTION NO. 71**

10 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
11 TORRENTING a complete READABLE copy of any of YOUR ASSERTED WORKS. Complete
12 means all pages of the ASSERTED WORK are present.

13 **REQUEST FOR PRODUCTION NO. 72**

14 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
15 TORRENTING a complete copy of any of YOUR ASSERTED WORKS. Complete means all
16 pages of the ASSERTED WORK are present.

17 **REQUEST FOR PRODUCTION NO. 73**

18 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
19 TORRENTING any READABLE portion or section of YOUR ASSERTED WORKS.

20 **REQUEST FOR PRODUCTION NO. 74**

21 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
22 TORRENTING any portion or section of YOUR ASSERTED WORKS.

23 **REQUEST FOR PRODUCTION NO. 75**

24 DOCUMENTS sufficient to show which THIRD PARTIES, if any, read a copy of any of
25 YOUR ASSERTED WORKS received from Meta via TORRENTING.

26 **REQUEST FOR PRODUCTION NO. 76**

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1 DOCUMENTS sufficient to show whether and how each THIRD PARTY who allegedly
2 received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS later used
3 that copy for any purpose, including but not limited to uses enumerated under 17 U.S.C. § 106.

4 **REQUEST FOR PRODUCTION No. 77**

5 DOCUMENTS sufficient to show how many BitTorrent peers received from Meta via
6 TORRENTING a copy of one of YOUR ASSERTED WORKS.

7 **REQUEST FOR PRODUCTION No. 78**

8 For each THIRD PARTY YOU allege received from Meta via TORRENTING a copy of
9 any of YOUR ASSERTED WORKS, DOCUMENTS sufficient to show that the THIRD PARTY
10 did not use that copy for a fair use purpose under 17 U.S.C. § 107.

11 **REQUEST FOR PRODUCTION No. 79**

12 DOCUMENTS sufficient to show how (i.e. through what means) any THIRD PARTY
13 downloaded from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

14 **REQUEST FOR PRODUCTION No. 80**

15 All COMMUNICATIONS between YOU and any THIRD PARTY who received from
16 Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

17 **REQUEST FOR PRODUCTION No. 81**

18 DOCUMENTS sufficient to show which THIRD PARTIES displayed (as defined by the
19 Copyright Act, 17 U.S.C. § 101) a copy of YOUR ASSERTED WORKS that they received from
20 Meta via TORRENTING.

21 **REQUEST FOR PRODUCTION No. 82**

22 DOCUMENTS sufficient to show which THIRD PARTIES distributed a copy of YOUR
23 ASSERTED WORKS that they received from Meta via TORRENTING.

24 **REQUEST FOR PRODUCTION No. 83**

25 DOCUMENTS sufficient to show which THIRD PARTIES performed (as defined by the
26 Copyright Act, 17 U.S.C. § 101) a copy of YOUR ASSERTED WORKS that they received from
27 Meta via TORRENTING.

28 **REQUEST FOR PRODUCTION No. 84**

1 DOCUMENTS sufficient to show which THIRD PARTIES reproduced YOUR
2 ASSERTED WORKS that they received from Meta via TORRENTING.

3 **REQUEST FOR PRODUCTION No. 85**

4 DOCUMENTS sufficient to show which THIRD PARTIES created a derivative work of
5 one of YOUR ASSERTED WORKS based on a copy they received from Meta via TORRENTING.

6 **REQUEST FOR PRODUCTION No. 86**

7 DOCUMENTS sufficient to show which THIRD PARTIES made a fair use (as defined in
8 17 U.S.C. § 107) of YOUR ASSERTED WORKS that they received from Meta via
9 TORRENTING.

10 **REQUEST FOR PRODUCTION No. 87**

11 DOCUMENTS sufficient to show all complete (i.e. the entirety of the work) copies of
12 YOUR ASSERTED WORKS that YOU claim were distributed by Meta via TORRENTING to a
13 THIRD PARTY.

14 **REQUEST FOR PRODUCTION No. 88**

15 DOCUMENTS sufficient to show how many complete (i.e. the entirety of the work) copies
16 of YOUR ASSERTED WORKS YOU claim were distributed by Meta via TORRENTING to a
17 THIRD PARTY.

18 **REQUEST FOR PRODUCTION No. 89**

19 DOCUMENTS sufficient to identify any instance of direct copyright infringement by a
20 THIRD PARTY that allegedly received from Meta via TORRENTING a copy of YOUR
21 ASSERTED WORKS.

22 **REQUEST FOR PRODUCTION No. 90**

23 All DOCUMENTS YOU intend to rely on to support YOUR claim that YOU lost any book
24 sales because of the alleged distribution by Meta via TORRENTING of YOUR ASSERTED
25 WORKS to a THIRD PARTY.

26 **REQUEST FOR PRODUCTION No. 91**

1 Any DOCUMENTS YOU intend to rely on to support YOUR claim that YOU lost revenue
2 as a result of the alleged distribution by Meta via TORRENTING of YOUR ASSERTED WORKS
3 to a THIRD PARTY.

4 **REQUEST FOR PRODUCTION No. 92**

5 All DOCUMENTS REFLECTING when and how YOU first became aware of Meta's
6 alleged contributory infringement of each of YOUR ASSERTED WORKS.

7 **REQUEST FOR PRODUCTION No. 93**

8 DOCUMENTS sufficient to show YOUR efforts, or the efforts by those acting on YOUR
9 behalf, to enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against
10 anyone who has allegedly contributorily infringed YOUR ASSERTED WORKS.

11 **REQUEST FOR PRODUCTION No. 94**

12 All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of
13 Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

14 **REQUEST FOR PRODUCTION No. 95**

15 All DOCUMENTS CONCERNING any lost sales or other lost opportunity that YOU
16 allegedly suffered due to Meta's alleged contributory infringement of YOUR ASSERTED
17 WORKS.

18 **REQUEST FOR PRODUCTION No. 96**

19 All DOCUMENTS CONCERNING any lost sales or other lost opportunity that YOU
20 allegedly suffered due to a THIRD PARTY's alleged direct infringement of YOUR ASSERTED
21 WORKS, which that THIRD PARTY allegedly received from Meta via TORRENTING.

22 **REQUEST FOR PRODUCTION No. 97**

23 All DOCUMENTS upon which YOU will rely to prove that a THIRD PARTY received
24 from Meta via TORRENTING an entire copy or portion of any of YOUR ASSERTED WORKS.

25 **REQUEST FOR PRODUCTION No. 98**

26 All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted
27 by YOU or on YOUR behalf regarding Meta's alleged contributory infringement of one or more
28 of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 99

All DOCUMENTS that any of YOUR testifying experts will rely on, have relied on, or have considered in forming any opinions in this ACTION CONCERNING Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 100

All DOCUMENTS RELATING to any efforts undertaken by YOU to monitor or investigate contributory infringement of one or more of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 101

All DOCUMENTS RELATING to any efforts undertaken by YOU to monitor or investigate direct infringement of one or more of YOUR ASSERTED WORKS by THIRD PARTIES.

REQUEST FOR PRODUCTION No. 102

All copies of THIRD PARTY reviews or criticisms of each of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 103

All DOCUMENTS and COMMUNICATIONS CONCERNING reviews or criticisms of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 104

All DOCUMENTS REFLECTING any analysis completed by YOU or on YOUR behalf regarding sales trends for YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 105

DOCUMENTS sufficient to show by year the amount of money YOU spent on promoting or marketing each of the ASSERTED WORKS in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION No. 106

DOCUMENTS sufficient to show each of the channels where each of the ASSERTED WORKS was marketed or promoted in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION No. 107

DOCUMENTS sufficient to show each of the channels where each of the ASSERTED WORKS was sold or distributed in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION NO. 108

DOCUMENTS sufficient to show the media coverage for each of the ASSERTED WORKS by year in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION NO. 109

DOCUMENTS sufficient to show any price changes by year for each of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 110

DOCUMENTS sufficient to show any stock or supply issues for each of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 111

DOCUMENTS sufficient to show which of the ASSERTED WORKS have ever been available for purchase for audible consumption (e.g. audiobooks).

REQUEST FOR PRODUCTION NO. 112

All COMMUNICATIONS between YOU on the one hand, and any authors of the ASSERTED WORKS, RELATING to the sales performance of those ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 113

All DOCUMENTS sufficient to show any datasets or materials that YOU downloaded for use to evaluate, test, or deploy an AI model.

REQUEST FOR PRODUCTION NO. 114

All COMMUNICATIONS between YOU and any THIRD PARTY CONCERNING META AI MODELS.

REQUEST FOR PRODUCTION NO. 115

DOCUMENTS sufficient to show any studies, assessments, forecasts, or analyses regarding competing products, media formats, platforms, channels, or substitutes for YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 116

DOCUMENTS sufficient to show changes in consumer preferences, audience engagement, and media-consumption patterns for YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 117

DOCUMENTS sufficient to show which of YOUR ASSERTED WORKS may be reviewed, in whole or in part, for free (without a subscription or payment).

1 Dated: June 18, 2026

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3 By:/s/ Jessica E. Phillips

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PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of Virginia. 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 9th 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 FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF LISA BARRETTA**



(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.

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Executed on June 18, 2026, at Washington, D.C.

/s/ Jessica E. Phillips
Jessica E. Phillips

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Attorneys for Defendant *Meta Platforms, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC., *et al.*,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
PLAINTIFF MATTHEW SACKS**

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF MATTHEW SACKS

SET NUMBER: ONE (1)

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Matthew Sacks (“Matthew Sacks” or “Plaintiff”) produce the following documents and things within thirty (30) days of service of this First Set of Requests for Production (“Requests”) at the offices of Dunn Isaacson Rhee LLP, 401 9th Street NW, Washington, D.C. 20004 or via an electronic production (e.g. FTP transfer, LiquidFiles, or another mutually-agreeable means).

DEFINITIONS

The following terms shall have the following definitions and meanings, regardless of capitalization, unless another definition or meaning clearly appears from the context in which the term is used:

1. YOU, YOUR, or YOURS mean Plaintiff Matthew Sacks and all officers, directors, employees, agents, attorneys, and other persons acting or purporting to act on Plaintiff’s behalf.
2. ACTION means the lawsuit titled *Cambronne Inc., et al. v. Meta Platforms, Inc.*, Case No. 3:26-cv-03725-VC (N.D. Cal.).
3. COMPLAINT means the operative complaint against Meta in the ACTION.
4. ASSERTED WORKS means the literary works that YOU have alleged in the ACTION and/or COMPLAINT that Meta has allegedly infringed.
5. GENERATIVE AI TOOL means any artificial intelligence system capable of producing text, images, audio, video, or other audiovisual content (e.g., large language models and diffusion models), including but not limited to ChatGPT, Gemini, Claude, Meta.AI, and Llama—including any and all versions or models thereof—and any internal or proprietary system, tool, or platform with any such capabilities.
6. REGISTRATION MATERIALS means applications, certificates, deposits, correspondence, continuations, amendments, and communications with the U.S. Copyright Office for any ASSERTED WORK.

- 1 7. CMI means Copyright Management Information as defined in 17 U.S.C. § 1202(c).
- 2 8. LLM means a generative artificial intelligence (“AI”) large language model.
- 3 9. META AI MODELS shall mean any Meta generative AI models (e.g., Meta.AI,
- 4 Llama) that are the subject of YOUR COMPLAINT.
- 5 10. PERSON means any natural person or any business, legal, or governmental entity
- 6 or association or any other cognizable entity, including, without limitation, corporations,
- 7 proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations,
- 8 governmental agencies or instrumentalities, societies, and orders.
- 9 11. READABLE means a copy of a work that is in a form that can be perceived,
- 10 understood, or interpreted by humans.
- 11 12. THIRD PARTY means all PERSONS other than the named Parties to this ACTION.
- 12 13. TORRENTING is used in the same sense as it is used in Plaintiff’s Complaint, and
- 13 means a method of downloading and sharing files directly between users (peer-to-peer, or P2P)
- 14 over the internet, rather than downloading from a single, central server.
- 15 14. COMMUNICATION(S) is used in its broadest sense and means any transmission
- 16 of information from one PERSON or entity to another by any means, including without limitation
- 17 DOCUMENTS consisting of or containing written communications, telephone communications, in
- 18 person communications, email, texts, Slack, social media posts or messages, instant messaging, and
- 19 any other electronic communications.
- 20 15. DOCUMENT(S) means the original and all non-identical copies (including drafts
- 21 and those with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as
- 22 defined in Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil
- 23 Procedure 34, and includes papers of all kinds and electronically stored information, including by
- 24 way of example and without limitation, electronic mail, letters, communications, memoranda,
- 25 notes, computer generated data, calendars, records, minutes, studies, reports, notebooks, messages,
- 26 telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written
- 27 notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data,
- 28 source code, data compilation, pictures, photographs, books, pamphlets, publications,

1 advertisements, sales literature, brochures, manuals, price lists, announcements, and any other
2 writings, records, or tangible objects produced or reproduced mechanically, electrically,
3 electronically, photographically, or chemically. The term also includes any parent or child
4 attachment or other documents embedded or linked in any way to a requested DOCUMENT.

5 16. CONCERNING or REFERRING or RELATING or REFLECTING are used
6 interchangeably, shall be construed in the broadest possible manner, and shall mean constituting,
7 relating to, reflecting, regarding, memorializing, identifying, embodying, referring to, pertaining
8 to, commenting on, discussing, analyzing, considering, describing, containing, consisting of,
9 connected to, indicating, evidencing, supporting, or refuting.

10 **INSTRUCTIONS**

11 1. Wherever used herein: the singular shall include the plural and vice versa; verb
12 tenses shall be interpreted to include past, present, and future tenses; the word “all” includes the
13 word “any” and vice versa; and the terms “and” and “or” shall be construed either disjunctively or
14 conjunctively as necessary to bring within the scope of these Requests any DOCUMENTS that
15 might otherwise be construed to be outside their scope.

16 2. Wherever used herein, the term “including” shall be construed as including, but not
17 limited to, the referenced item(s), matter(s), or subject(s).

18 3. YOU must produce all DOCUMENTS in YOUR possession, custody, or control,
19 wherever located.

20 4. Each DOCUMENT must be produced as it is kept in the usual course of business,
21 including all file folders, binders, notebooks, data sharing systems and other devices by which such
22 papers, data, information or things may be organized, separated or stored. For example, a
23 DOCUMENT or thing that is part of a file, docket or other grouping should be physically produced
24 together with all other DOCUMENTS from said file, docket, or grouping, in the same order or
25 manner of arrangement.

26 5. DOCUMENTS should be produced in a form pursuant to a production protocol to
27 be agreed upon by the parties, in a form in which they are ordinarily maintained (e.g., native form),
28 or in a reasonably usable form (e.g., TIFF images with Relativity-compatible load files).

1 6. If any of the Requests cannot be responded to in full after exercising due diligence
2 to secure the information, respond to the extent possible, specifying YOUR inability to respond to
3 the remainder and stating whatever information YOU have CONCERNING the unanswered
4 portions.

5 7. If YOU object to all or any portion of a particular Request: (i) produce all
6 DOCUMENTS within the scope of the Request to which YOU do not object; and (ii) describe
7 whether—and to what extent—YOU have limited YOUR production of DOCUMENTS as a result
8 of YOUR objection(s).

9 8. If any DOCUMENT responsive to these Requests is withheld under a claim of
10 privilege, YOU must promptly comply with the requirements of Federal Rule of Civil Procedure
11 26(b)(5) and any other operative agreement between the parties as to each DOCUMENT for which
12 a claim of privilege or protection from discovery is made.

13 9. When a DOCUMENT contains both privileged and non-privileged material, the
14 non-privileged material must be disclosed to the fullest extent possible without disclosing the
15 privileged material. If a privilege is asserted with regard to part of the material contained in a
16 DOCUMENT, the party claiming the privilege must clearly indicate the portions as to which the
17 privilege is claimed. When a DOCUMENT has been redacted or altered in any fashion, YOU shall
18 identify as to each DOCUMENT the reason for the redaction or alteration, the date of the redaction
19 or alteration, and the individual performing the redaction or alteration. Any redaction must be
20 clearly visible on the redacted DOCUMENT.

21 10. If DOCUMENTS that fall within the scope of a Request were lost or destroyed after
22 this ACTION was filed: (i) describe the DOCUMENTS (type, subject matter, etc.) that have been
23 lost or destroyed; and (ii) explain the circumstances RELATING to the loss or destruction of such
24 DOCUMENTS.

25 11. If YOU have no DOCUMENTS that fall within the scope of a Request, please so
26 state in YOUR written response thereto.

27 12. These Requests are continuing in nature and YOUR responses to them are to be
28 promptly supplemented or amended if, after the time of YOUR initial responses, YOU learn that

any response is or has become in some material respect incomplete or incorrect, pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1

DOCUMENTS sufficient to show the REGISTRATION MATERIALS for each ASSERTED WORK, including but not limited to applications, deposits, certificates, and correspondence with the Copyright Office.

REQUEST FOR PRODUCTION NO. 2

DOCUMENTS sufficient to show any previous registration, new material included, or limitations identified in the REGISTRATION MATERIALS for any ASSERTED WORK, including, but not limited to, DOCUMENTS sufficient to show the extent of any new (as opposed to pre-existing) material in a particular edition of an ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 3

DOCUMENTS sufficient to show the chain of title for each ASSERTED WORK, including but not limited to any assignments and amendments thereto.

REQUEST FOR PRODUCTION NO. 4

DOCUMENTS sufficient to identify each PERSON who contributed written material to each ASSERTED WORK and the extent of their contributions.

REQUEST FOR PRODUCTION NO. 5

For each of the ASSERTED WORKS that is not a work made for hire (as that term is used and defined in 17 U.S.C. § 101), DOCUMENTS sufficient to show the basis for YOUR assertion of rights in the work, including, but not limited to, any agreement(s) or correspondence with the author of the work.

REQUEST FOR PRODUCTION NO. 6

DOCUMENTS sufficient to identify each literary work (by title and author) that YOU and/or any THIRD PARTY authors of the ASSERTED WORKS purchased, acquired, borrowed, referenced, or reviewed for purposes of researching, writing, or editing the ASSERTED WORKS, whether or not such works are identified as reference material in the ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 7

All DOCUMENTS CONCERNING any requests by YOU and/or any THIRD PARTY authors of the ASSERTED WORKS for permission to quote, reference, or otherwise use works written by THIRD PARTIES in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 8

All DOCUMENTS CONCERNING any licenses YOU have acquired to quote, reference, or otherwise use works written by THIRD PARTIES in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 9

All DOCUMENTS CONCERNING any complaints or allegations by THIRD PARTIES of plagiarism or copyright infringement in the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 10

DOCUMENTS sufficient to show any written materials used in preparation of the ASSERTED WORKS, including notes and outlines.

REQUEST FOR PRODUCTION NO. 11

DOCUMENTS sufficient to identify any THIRD PARTY written materials relied upon or used as inspiration during the creation of any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 12

All DOCUMENTS between YOU and any PERSON CONCERNING any actual or potential claims against Meta, including direct COMMUNICATIONS, interviews, statements to the press, and social media posts.

REQUEST FOR PRODUCTION NO. 13

All DOCUMENTS between YOU and any PERSON CONCERNING actual or potential claims against developers of LLMs other than Meta, including direct COMMUNICATIONS, interviews, statements to the press, and social media posts.

REQUEST FOR PRODUCTION NO. 14

All COMMUNICATIONS CONCERNING YOUR statements, opinions, and/or views about Meta.

REQUEST FOR PRODUCTION No. 15

All COMMUNICATIONS between YOU and any PERSONS who contributed written material to the ASSERTED WORKS, CONCERNING this ACTION.

REQUEST FOR PRODUCTION No. 16

All DOCUMENTS produced or provided to YOU by THIRD PARTIES RELATING TO this ACTION.

REQUEST FOR PRODUCTION No. 17

All DOCUMENTS REFLECTING when and how YOU first became aware of Meta's alleged infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 18

All DOCUMENTS REFLECTING when and how YOU first became aware of the alleged infringement of the ASSERTED WORKS by THIRD PARTY developers of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION No. 19

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding Meta's alleged infringement of one or more of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 20

All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted by YOU or on YOUR behalf regarding alleged infringement of one or more of the ASSERTED WORKS by THIRD PARTY developers of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION No. 21

All of YOUR COMMUNICATIONS with any THIRD PARTY CONCERNING META AI MODELS.

REQUEST FOR PRODUCTION No. 22

All DOCUMENTS CONCERNING YOUR allegations that Meta distributed any ASSERTED WORK, including but not limited to via TORRENTING or other peer-to-peer protocols, including any technical analyses and network logs.

REQUEST FOR PRODUCTION NO. 23

All DOCUMENTS CONCERNING YOUR allegations that Meta “induced” or “materially contributed” to THIRD PARTY infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 24

DOCUMENTS sufficient to show any GENERATIVE AI TOOLS that YOU have used, or that have been used on YOUR behalf, including, as applicable, the account username(s) for each such tool and the date the account was created.

REQUEST FOR PRODUCTION NO. 25

All DOCUMENTS CONCERNING any instances in which YOU approved the use of META AI MODELS by YOUR employees or contractors.

REQUEST FOR PRODUCTION NO. 26

DOCUMENTS sufficient to show any GENERATIVE AI TOOL tested or evaluated by YOU for use by YOUR employees or contractors, including, but not limited to, vendor contracts, non-disclosure agreements (NDAs), statements of work, or research reports or analyses.

REQUEST FOR PRODUCTION NO. 27

DOCUMENTS sufficient to show all GENERATIVE AI TOOLS incorporated into any offering provided to YOU, including, but not limited to AI ad generators.

REQUEST FOR PRODUCTION NO. 28

DOCUMENTS sufficient to show all business plans, analyses, assessments, roadmaps, research reports, or other studies CONCERNING YOUR incorporation of any GENERATIVE AI TOOLS into any offering provided by YOU.

REQUEST FOR PRODUCTION NO. 29

Copies of YOUR billing statements REFLECTING the amount YOU have paid for YOUR use of any LLM.

REQUEST FOR PRODUCTION NO. 30

DOCUMENTS sufficient to show any articles, blog posts, books, or other written works published by YOU that instruct on, promote, and/or otherwise condone the use of GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 31

Copies of any articles, blog posts, books, or other written works published by YOU or otherwise displayed on YOUR website that were created using GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION NO. 32

DOCUMENTS sufficient to show articles, books, or other written works that YOU claim ownership of other than ASSERTED WORKS, and for which the subject matter is the same as or substantively equivalent to one or more of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 33

DOCUMENTS sufficient to show all of the ways in which YOU have monetized the ASSERTED WORKS, including but not limited to direct sales, subscriptions, and bundling.

REQUEST FOR PRODUCTION NO. 34

For each ASSERTED WORK, DOCUMENTS sufficient to show where and how one can download, read, or otherwise purchase the work.

REQUEST FOR PRODUCTION NO. 35

DOCUMENTS sufficient to show, between January 1, 2015, and the present, weekly sales volume and corresponding revenue, costs, and profits corresponding to the ASSERTED WORKS and separated by edition (e.g. hardcover, softcover) and channel (e.g., digital, print, etc.).

REQUEST FOR PRODUCTION NO. 36

DOCUMENTS sufficient to show, between January 1, 2015, and the present, monthly revenue, profit, and costs corresponding to any licensing of any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 37

DOCUMENTS sufficient to show, between January 1, 2015, and the present, monthly revenue, profit, and costs corresponding to any subscriptions that incorporate access to any ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 38

For each of YOUR ASSERTED WORKS that is available via Kindle Unlimited or any other online subscriptions, DOCUMENTS sufficient to show, on a monthly basis, the number of readers for each work between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 39

For each of YOUR ASSERTED WORKS that is available via Kindle Unlimited or other online subscriptions, DOCUMENTS sufficient to show, on a monthly basis, Kindle Edition Normalized Pages tracking data between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 40

To the extent that YOU have made an ASSERTED WORK available to read on YOUR website or any website controlled by YOU (whether for a fee or for free), DOCUMENTS sufficient to show the number of daily visitors to the webpage containing the ASSERTED WORK between January 1, 2015, and the present.

REQUEST FOR PRODUCTION NO. 41

All DOCUMENTS CONCERNING any efforts by YOU on or after January 1, 2021, to make any of the ASSERTED WORKS, or portions thereof, available on the internet for free.

REQUEST FOR PRODUCTION NO. 42

DOCUMENTS sufficient to identify each instance on or after January 1, 2021, in which YOU provided free copies of any of the ASSERTED WORKS to THIRD PARTIES for purposes of soliciting reviews, commentary, criticism, endorsements, or summaries.

REQUEST FOR PRODUCTION NO. 43

DOCUMENTS sufficient to show any business plan, go-to-market plan, market analysis, study, assessment, or forecast, for each ASSERTED WORK.

REQUEST FOR PRODUCTION NO. 44

DOCUMENTS sufficient to show any assessment or analysis of YOUR competition and/or competitors for the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 45

DOCUMENTS sufficient to show any studies, surveys, reports, or analyses RELATING to YOUR marketing or sales of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 46

DOCUMENTS sufficient to show YOUR revenues or consideration received for the promotion of GENERATIVE AI TOOLS on YOUR website.

REQUEST FOR PRODUCTION No. 47

All DOCUMENTS CONCERNING the injury or other harm that YOU allegedly suffered due to Meta's alleged infringement of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 48

DOCUMENTS sufficient to show any valuations of the ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 49

All DOCUMENTS evidencing a market for sale or license of YOUR ASSERTED WORKS, or derivations thereof, for purposes of training GENERATIVE AI TOOLS.

REQUEST FOR PRODUCTION No. 50

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to Meta's economic impact on sales of YOUR ASSERTED WORKS or any lost revenue RELATING to YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 51

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to Meta's economic impact on YOUR ASSERTED WORKS and/or any markets for YOUR ASSERTED WORKS or derivations of the ASSERTED WORKS, including but not limited to any licensing or product markets.

REQUEST FOR PRODUCTION No. 52

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to any GENERATIVE AI TOOL's economic impact on sales of YOUR ASSERTED WORKS or any lost revenue RELATING to YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 53

All DOCUMENTS CONCERNING any study, survey, report, or analysis RELATING to any GENERATIVE AI TOOL's economic impact on the ASSERTED WORKS and/or any markets for the ASSERTED WORKS or derivations of the ASSERTED WORKS, including but not limited to any licensing or product markets.

REQUEST FOR PRODUCTION No. 54

1 All DOCUMENTS that YOU may offer, use, or rely on to support any contention that there
2 is a market for licensing the ASSERTED WORKS to train any LLM, including DOCUMENTS
3 sufficient to identify that market, when and how it first developed, and the PERSONS involved,
4 and any DOCUMENTS RELATING to the licensing or use of the ASSERTED WORKS in such
5 market(s).

6 **REQUEST FOR PRODUCTION NO. 55**

7 All DOCUMENTS upon which YOU will rely to support any contention that Meta's use of
8 the ASSERTED WORKS to train an LLM caused harm to any market for those works.

9 **REQUEST FOR PRODUCTION NO. 56**

10 All DOCUMENTS that YOU may offer, use, or rely on to support any contention that
11 Meta's use of the ASSERTED WORKS to train any LLM was not a fair use under 17 U.S.C. § 107.

12 **REQUEST FOR PRODUCTION NO. 57**

13 DOCUMENTS sufficient to show any licensing, permissions, or consents given by YOU
14 or on YOUR behalf to THIRD PARTIES CONCERNING the ASSERTED WORKS on or after
15 January 1, 2015.

16 **REQUEST FOR PRODUCTION NO. 58**

17 DOCUMENTS sufficient to show prospective licensing opportunities for the ASSERTED
18 WORKS.

19 **REQUEST FOR PRODUCTION NO. 59**

20 All DOCUMENTS CONCERNING actual or prospective licensing of the ASSERTED
21 WORKS to train a GENERATIVE AI TOOL.

22 **REQUEST FOR PRODUCTION NO. 60**

23 DOCUMENTS sufficient to show any agreements, contracts, or understandings between
24 YOU on the one hand, and any entity or association owned, operated, or controlled by YOU with
25 any title or any interest (e.g. ownership interest or security interest) in any of the ASSERTED
26 WORKS, on the other hand.

27 **REQUEST FOR PRODUCTION NO. 61**

28

1 DOCUMENTS sufficient to identify any website, THIRD PARTY publication, social
2 media account, or other print or digital media, of which YOU are aware, that (1) summarizes any
3 of the ASSERTED WORKS; (2) reviews or criticizes any of the ASSERTED WORKS; (3) quotes
4 from any of the ASSERTED WORKS; or (4) otherwise replicates more than 10 lines from any of
5 the ASSERTED WORKS (but is not itself an ASSERTED WORK).

6 **REQUEST FOR PRODUCTION No. 62**

7 DOCUMENTS sufficient to show each website and URL known to YOU at which any of
8 the ASSERTED WORKS may be accessed for free by THIRD PARTIES.

9 **REQUEST FOR PRODUCTION No. 63**

10 For each website and URL known to YOU at which any of the ASSERTED WORKS may
11 be accessed by THIRD PARTIES for free and/or without YOUR authorization, DOCUMENTS
12 sufficient to show any effort by YOU to have the ASSERTED WORK(S) removed from that
13 website.

14 **REQUEST FOR PRODUCTION No. 64**

15 DOCUMENTS sufficient to show any efforts undertaken by YOU on or after January 1,
16 2021, to enforce YOUR copyrights for any of the ASSERTED WORKS, or to monitor for or
17 investigate infringement of the ASSERTED WORKS.

18 **REQUEST FOR PRODUCTION No. 65**

19 All DOCUMENTS CONCERNING any analyses by YOU of outputs created using META
20 AI MODELS.

21 **REQUEST FOR PRODUCTION No. 66**

22 All DOCUMENTS CONCERNING any analyses by YOU of outputs created using
23 GENERATIVE AI TOOLS other than META AI MODELS.

24 **REQUEST FOR PRODUCTION No. 67**

25 All DOCUMENTS that any of YOUR testifying experts have relied on or considered in
26 forming any opinions in this ACTION.

27 **REQUEST FOR PRODUCTION No. 68**

28

1 All DOCUMENTS that YOU may offer, use, or rely on at trial, for summary judgment, in
2 any deposition, or at any other hearing or proceeding in this ACTION.

3 **REQUEST FOR PRODUCTION NO. 69**

4 DOCUMENTS sufficient to show by name any THIRD PARTY who allegedly received
5 from Meta via TORRENTING any of YOUR ASSERTED WORKS.

6 **REQUEST FOR PRODUCTION NO. 70**

7 All DOCUMENTS YOU rely on to support YOUR allegation that any THIRD PARTY
8 received or downloaded YOUR ASSERTED WORKS from Meta.

9 **REQUEST FOR PRODUCTION NO. 71**

10 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
11 TORRENTING a complete READABLE copy of any of YOUR ASSERTED WORKS. Complete
12 means all pages of the ASSERTED WORK are present.

13 **REQUEST FOR PRODUCTION NO. 72**

14 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
15 TORRENTING a complete copy of any of YOUR ASSERTED WORKS. Complete means all
16 pages of the ASSERTED WORK are present.

17 **REQUEST FOR PRODUCTION NO. 73**

18 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
19 TORRENTING any READABLE portion or section of YOUR ASSERTED WORKS.

20 **REQUEST FOR PRODUCTION NO. 74**

21 DOCUMENTS sufficient to show that any THIRD PARTY received from Meta via
22 TORRENTING any portion or section of YOUR ASSERTED WORKS.

23 **REQUEST FOR PRODUCTION NO. 75**

24 DOCUMENTS sufficient to show which THIRD PARTIES, if any, read a copy of any of
25 YOUR ASSERTED WORKS received from Meta via TORRENTING.

26 **REQUEST FOR PRODUCTION NO. 76**

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1 DOCUMENTS sufficient to show whether and how each THIRD PARTY who allegedly
2 received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS later used
3 that copy for any purpose, including but not limited to uses enumerated under 17 U.S.C. § 106.

4 **REQUEST FOR PRODUCTION No. 77**

5 DOCUMENTS sufficient to show how many BitTorrent peers received from Meta via
6 TORRENTING a copy of one of YOUR ASSERTED WORKS.

7 **REQUEST FOR PRODUCTION No. 78**

8 For each THIRD PARTY YOU allege received from Meta via TORRENTING a copy of
9 any of YOUR ASSERTED WORKS, DOCUMENTS sufficient to show that the THIRD PARTY
10 did not use that copy for a fair use purpose under 17 U.S.C. § 107.

11 **REQUEST FOR PRODUCTION No. 79**

12 DOCUMENTS sufficient to show how (i.e. through what means) any THIRD PARTY
13 downloaded from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

14 **REQUEST FOR PRODUCTION No. 80**

15 All COMMUNICATIONS between YOU and any THIRD PARTY who received from
16 Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

17 **REQUEST FOR PRODUCTION No. 81**

18 DOCUMENTS sufficient to show which THIRD PARTIES displayed (as defined by the
19 Copyright Act, 17 U.S.C. § 101) a copy of YOUR ASSERTED WORKS that they received from
20 Meta via TORRENTING.

21 **REQUEST FOR PRODUCTION No. 82**

22 DOCUMENTS sufficient to show which THIRD PARTIES distributed a copy of YOUR
23 ASSERTED WORKS that they received from Meta via TORRENTING.

24 **REQUEST FOR PRODUCTION No. 83**

25 DOCUMENTS sufficient to show which THIRD PARTIES performed (as defined by the
26 Copyright Act, 17 U.S.C. § 101) a copy of YOUR ASSERTED WORKS that they received from
27 Meta via TORRENTING.

28 **REQUEST FOR PRODUCTION No. 84**

1 DOCUMENTS sufficient to show which THIRD PARTIES reproduced YOUR
2 ASSERTED WORKS that they received from Meta via TORRENTING.

3 **REQUEST FOR PRODUCTION NO. 85**

4 DOCUMENTS sufficient to show which THIRD PARTIES created a derivative work of
5 one of YOUR ASSERTED WORKS based on a copy they received from Meta via TORRENTING.

6 **REQUEST FOR PRODUCTION NO. 86**

7 DOCUMENTS sufficient to show which THIRD PARTIES made a fair use (as defined in
8 17 U.S.C. § 107) of YOUR ASSERTED WORKS that they received from Meta via
9 TORRENTING.

10 **REQUEST FOR PRODUCTION NO. 87**

11 DOCUMENTS sufficient to show all complete (i.e. the entirety of the work) copies of
12 YOUR ASSERTED WORKS that YOU claim were distributed by Meta via TORRENTING to a
13 THIRD PARTY.

14 **REQUEST FOR PRODUCTION NO. 88**

15 DOCUMENTS sufficient to show how many complete (i.e. the entirety of the work) copies
16 of YOUR ASSERTED WORKS YOU claim were distributed by Meta via TORRENTING to a
17 THIRD PARTY.

18 **REQUEST FOR PRODUCTION NO. 89**

19 DOCUMENTS sufficient to identify any instance of direct copyright infringement by a
20 THIRD PARTY that allegedly received from Meta via TORRENTING a copy of YOUR
21 ASSERTED WORKS.

22 **REQUEST FOR PRODUCTION NO. 90**

23 All DOCUMENTS YOU intend to rely on to support YOUR claim that YOU lost any book
24 sales because of the alleged distribution by Meta via TORRENTING of YOUR ASSERTED
25 WORKS to a THIRD PARTY.

26 **REQUEST FOR PRODUCTION NO. 91**

1 Any DOCUMENTS YOU intend to rely on to support YOUR claim that YOU lost revenue
2 as a result of the alleged distribution by Meta via TORRENTING of YOUR ASSERTED WORKS
3 to a THIRD PARTY.

4 **REQUEST FOR PRODUCTION No. 92**

5 All DOCUMENTS REFLECTING when and how YOU first became aware of Meta's
6 alleged contributory infringement of each of YOUR ASSERTED WORKS.

7 **REQUEST FOR PRODUCTION No. 93**

8 DOCUMENTS sufficient to show YOUR efforts, or the efforts by those acting on YOUR
9 behalf, to enforce claimed rights under the Copyright Act in YOUR ASSERTED WORKS against
10 anyone who has allegedly contributorily infringed YOUR ASSERTED WORKS.

11 **REQUEST FOR PRODUCTION No. 94**

12 All DOCUMENTS supporting YOUR contention that YOU sustained injury as a result of
13 Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

14 **REQUEST FOR PRODUCTION No. 95**

15 All DOCUMENTS CONCERNING any lost sales or other lost opportunity that YOU
16 allegedly suffered due to Meta's alleged contributory infringement of YOUR ASSERTED
17 WORKS.

18 **REQUEST FOR PRODUCTION No. 96**

19 All DOCUMENTS CONCERNING any lost sales or other lost opportunity that YOU
20 allegedly suffered due to a THIRD PARTY's alleged direct infringement of YOUR ASSERTED
21 WORKS, which that THIRD PARTY allegedly received from Meta via TORRENTING.

22 **REQUEST FOR PRODUCTION No. 97**

23 All DOCUMENTS upon which YOU will rely to prove that a THIRD PARTY received
24 from Meta via TORRENTING an entire copy or portion of any of YOUR ASSERTED WORKS.

25 **REQUEST FOR PRODUCTION No. 98**

26 All DOCUMENTS CONCERNING any analysis, assessment, or other research conducted
27 by YOU or on YOUR behalf regarding Meta's alleged contributory infringement of one or more
28 of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 99

All DOCUMENTS that any of YOUR testifying experts will rely on, have relied on, or have considered in forming any opinions in this ACTION CONCERNING Meta's alleged contributory infringement of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 100

All DOCUMENTS RELATING to any efforts undertaken by YOU to monitor or investigate contributory infringement of one or more of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 101

All DOCUMENTS RELATING to any efforts undertaken by YOU to monitor or investigate direct infringement of one or more of YOUR ASSERTED WORKS by THIRD PARTIES.

REQUEST FOR PRODUCTION No. 102

All copies of THIRD PARTY reviews or criticisms of each of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 103

All DOCUMENTS and COMMUNICATIONS CONCERNING reviews or criticisms of YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 104

All DOCUMENTS REFLECTING any analysis completed by YOU or on YOUR behalf regarding sales trends for YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION No. 105

DOCUMENTS sufficient to show by year the amount of money YOU spent on promoting or marketing each of the ASSERTED WORKS in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION No. 106

DOCUMENTS sufficient to show each of the channels where each of the ASSERTED WORKS was marketed or promoted in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION No. 107

DOCUMENTS sufficient to show each of the channels where each of the ASSERTED WORKS was sold or distributed in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION NO. 108

DOCUMENTS sufficient to show the media coverage for each of the ASSERTED WORKS by year in the U.S., from first sale or publication to present.

REQUEST FOR PRODUCTION NO. 109

DOCUMENTS sufficient to show any price changes by year for each of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 110

DOCUMENTS sufficient to show any stock or supply issues for each of the ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 111

DOCUMENTS sufficient to show which of the ASSERTED WORKS have ever been available for purchase for audible consumption (e.g. audiobooks).

REQUEST FOR PRODUCTION NO. 112

All COMMUNICATIONS between YOU on the one hand, and any authors of the ASSERTED WORKS, RELATING to the sales performance of those ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 113

All DOCUMENTS sufficient to show any datasets or materials that YOU downloaded for use to evaluate, test, or deploy an AI model.

REQUEST FOR PRODUCTION NO. 114

All COMMUNICATIONS between YOU and any THIRD PARTY CONCERNING META AI MODELS.

REQUEST FOR PRODUCTION NO. 115

DOCUMENTS sufficient to show any studies, assessments, forecasts, or analyses regarding competing products, media formats, platforms, channels, or substitutes for YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 116

DOCUMENTS sufficient to show changes in consumer preferences, audience engagement, and media-consumption patterns for YOUR ASSERTED WORKS.

REQUEST FOR PRODUCTION NO. 117

DOCUMENTS sufficient to show which of YOUR ASSERTED WORKS may be reviewed, in whole or in part, for free (without a subscription or payment).

1 Dated: June 18, 2026

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3 By:/s/ Jessica E. Phillips

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PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of Virginia. 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 9th 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 FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF MATTHEW SACKS**



(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.

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Executed on June 18, 2026, at Washington, D.C.

/s/ Jessica E. Phillips
Jessica E. Phillips