

EXHIBIT E

From: [Lauren E Martin](#)
To: [Morton, Phillip](#)
Cc: [AI Copyright Team@fnf.law](#); [John Super](#); [Christopher Regan](#)
Subject: Discovery Extension and Meta's Supplemental Responses
Date: Wednesday, August 26, 2026 7:23:00 PM

Phil,

Thank you for speaking with me and John today regarding Meta's interrogatory responses for each of the Three Cs. We know things are especially busy this week.

To summarize our conversation, my understanding is that Meta intends to supplement responses to the interrogatories served by Cognella on August 29, incorporating the details discussed on today's call to the extent possible. Specifically, the supplement will include a list of the Cognella works that were obtained from Shadow Libraries and Webcrawling and the date(s) which they were acquired. The timing and scope of the other supplemental responses (CSS and Cambronne, et al) remains at issue.

Generally, as to Interrogatory Request Nos. 2-7 for the Three Cs, you are going to get back to me on whether and to what extent you plan to do the following:

- ROG No. 2 – Supplement to explain why Meta will not or cannot search SpiderMate for the Plaintiffs' works. ****In the meantime, I've agreed to check with my clients to see if there are particular URLs we'd specifically like you to search.
- ROG No. 3 – Supplement to explain the dates for each and every time Plaintiffs' works were downloaded/torrented from each Shadow Library and/or scraped from Common Crawl and/or SpiderMate.
- ROG No. 5 – Supplement to revise the response and Exhibit C to identify which training dataset/dataset files related to training which Llama model(s) and when (dates of training), along with an explanation of why individual dates of unique access to those datasets/files cannot/will not be provided. Further, with regard to Meta's unilateral attempt to redefine LLMs, an explanation of why training datasets/files that relate to any other LLM (e.g., an experimental program or model at Meta other than one that was commercialized) were not or cannot be identified in response to ROG No. 5.
- ROG No. 6 – Supplement to answer the interrogatory in a straightforward manner – whether it can categorically admit to the removal and/or filtration of CMI. As stated, the response speaks only to "repetitive text" and only to "at least some of" the works.
- ROG No. 7 – Supplement to address whether the response will apply to all asserted works that have been identified by Meta. Further supplement to add explanation about subsections (a), (e), (i), and (l). Specifically, we'd like you to supplement to explain why Meta cannot or will not provide work-specific explanation as to how the works were retained, duplicated, reproduced, distributed, and/or deleted (and how many times each) during this process.

We also discussed whether Meta will agree to de-designate the Exhibits to the ROG responses so that they are no longer AEO. We'd like to be able to discuss the contents of those exhibits with our clients. Of course, they would remain confidential.

Lastly, you asked for an extension for the written discovery responses that Meta has due to the Three Cs tomorrow. We will grant the requested extension for those responses to be due Monday, August 31.

I would appreciate confirmation about the items discussed today and what you intend to discuss with your team and your client. We'd like an update tomorrow regarding a date certain for any intended supplements and context for what, if anything, you do intend to supplement. As I explained on our call, the close of fact discovery looms and if we are at an impasse, we intend to seek relief on or before next Tuesday when our briefing is due to Judge Hixon.

Elle

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