

EXHIBIT M

[counsel listed on signature page]

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
ADMISSION**

Trial Date: May 24, 2027

Date Action Filed: March 17, 2026

Judge: The Hon. V. Chhabria

1 **PROPOUNDING PARTY:** **DEFENDANT META PLATFORMS, INC.**

2 **RESPONDING PARTY:** **CHICKEN SOUP FOR THE SOUL, LLC**

3 **SET NUMBER:** **ONE**

4 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendant Meta Platforms,
5 Inc. (“Meta”) requests that Plaintiff Chicken Soup for the Soul, LLC (“Plaintiff”) admit or deny,
6 separately and in writing under oath, each of the matters set forth below (the “Requests”).

7 **DEFINITIONS**

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

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

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

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

17 4. ASSERTED WORK/ASSERTED WORKS means YOUR purportedly copyrighted
18 works that YOU have alleged in the ACTION and/or COMPLAINT that Meta has allegedly infringed.

19 5. PUBLICATION DATE means the first date on which: (a) a copy of an ASSERTED
20 WORK, in any format, was distributed to the public or to YOUR subscribers by sale or other transfer of
21 ownership, or by rental, lease or lending, or (b) YOU offered to distribute copies of an ASSERTED
22 WORK in any format to a group of persons for purposes of further distribution, public performance, or
23 public display.

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

27 7. GENERATIVE AI TOOL means any artificial intelligence (“AI”) system capable of
28

1 producing text, images, audio, video, or other audiovisual content (e.g., large language models and
2 diffusion models), including but not limited to ChatGPT, Gemini, Claude, Microsoft CoPilot, Meta.AI,
3 and Llama—including any and all versions or models thereof—and any internal or proprietary system,
4 tool, or platform with any such capabilities.

5 8. LLM means a generative AI large language model.

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

8 10. WEB CRAWLER means any automated program, script, bot, spider, or software agent
9 that systematically browses, indexes, downloads, or scrapes content from the internet, including without
10 limitation any tool used to harvest, collect, or copy text, data, files, or other content from web pages or
11 online repositories.

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

16 12. THIRD PARTY means all PERSONS other than YOU and Meta.
17 TORRENTING is used in the same sense as it is used in Plaintiff’s Complaint, and means a method of
18 downloading and sharing files directly between users (peer-to-peer, or P2P) over the internet, rather than
19 downloading from a single, central server.

20 13. COMMUNICATION(S) is used in its broadest sense and means any transmission of
21 information from one PERSON to another by any means, including without limitation written
22 communications, telephone communications, in person communications, email, texts, Slack, instant
23 messaging, and other electronic communications.

24 14. DOCUMENT(S) means the original and all non-identical copies (including drafts and
25 those with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as defined in
26 Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil Procedure 34,
27 and includes papers of all kinds and information stored electronically, including by way of example and
28

without limitation, electronic mail, letters, communications, memoranda, notes, computer generated data, calendars, records, minutes, studies, reports, notebooks, messages, telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data, source code, data compilation, pictures, photographs, books, pamphlets, publications, advertisements, sales literature, brochures, manuals, price lists, announcements, and any other writings, records, or tangible objects produced or reproduced mechanically, electrically, electronically, photographically, or chemically. The term also includes any parent or child attachment or other documents embedded or linked in any way to a requested DOCUMENT.

15. CONCERNING or REFERRING or RELATING or REFLECTING or EVIDENCING are used interchangeably and shall mean constituting, relating to, reflecting, regarding, memorializing, identifying, embodying, referring to, pertaining to, commenting on, discussing, analyzing, considering, describing, containing, consisting of, connected to, indicating, supporting, or refuting.

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

INSTRUCTIONS

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

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

3. Meta requests that YOU admit or deny the truth of each statement or fact, application of law to fact, or opinions about either, set forth in the Requests below.

4. To the extent that YOU do not respond with either an unqualified admission or an objection (the reasons for which must be stated), YOU shall specifically deny the matter and set forth in

1 detail the reasons why YOU cannot truthfully admit the matter. Any such denial shall fairly meet the
2 substance of the Request, and when good faith requires that YOU qualify an answer or deny only a part
3 of the matter in which any admission is requested, YOU shall specify so much of it as is true and qualify
4 or deny the remainder.

5 5. If, in responding to these Requests, YOU encounter any ambiguities when construing a
6 Request, instruction, or definition, YOU shall set forth in YOUR response the matter deemed ambiguous
7 and the construction used in responding.

8 6. YOU may not give lack of information or knowledge as the reason for failure to admit
9 or deny unless YOU state that YOU have made reasonable inquiry and that the information known or
10 readily obtainable by YOU is insufficient to enable YOU to admit or deny.

11 7. The fact that a Request covers a matter which YOU believe presents a genuine issue for
12 trial may not, on that ground alone, provide the basis for an objection.

13 8. If a Request is silent as to the time period for which information is sought, YOUR
14 response should include all information known to YOU CONCERNING events that occurred, in whole
15 or in part, at any time during the period of 2021 to the present except for the Requests relating to
16 Plaintiff's works, which should go back to the creation of the particular work(s) at issue.

17 9. Any Request set forth below to which there has not been an adequate and timely response
18 may be deemed admitted and, therefore, conclusively established for purposes of this ACTION.

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

23 **REQUESTS FOR ADMISSION**

24 **REQUEST FOR ADMISSION NO. 1:**

25 Admit that YOU are unaware of any lost sales of any ASSERTED WORK due to any conduct
26 of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 2:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that YOU have lost any sales of any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 3:

Admit that YOU are unaware of any specific licensing opportunity that YOU lost for any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 4:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that YOU lost any specific licensing opportunity for any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 5:

Admit that YOU are unaware of any PERSON that has opted not to purchase one of the ASSERTED WORKS due to that PERSON's use of META AI MODELS.

REQUEST FOR ADMISSION NO. 6:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that any PERSON has opted not to purchase one of the ASSERTED WORKS due to that PERSON's use of META AI MODELS.

REQUEST FOR ADMISSION NO. 7:

Admit that, for each ASSERTED WORK, more than fifty percent (50%) of all gross revenue was generated within the three (3) years immediately following its PUBLICATION DATE.

REQUEST FOR ADMISSION NO. 8:

Admit that no THIRD PARTY has offered YOU compensation to use any of the ASSERTED WORKS to train a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 9:

Admit that YOU are unaware of any COMMUNICATIONS preceding the initiation of the ACTION in which a THIRD PARTY offered or engaged in discussions concerning the potential to offer YOU compensation to use any of the ASSERTED WORKS to train a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 10:

Admit that YOU have never licensed any of the ASSERTED WORKS for actual or potential use in connection with development of a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 11:

Admit that YOU are unaware of any of the ASSERTED WORKS ever having been licensed for actual or potential use in connection with the development of a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 12:

Admit that YOU have not granted another PERSON the right to license the ASSERTED WORKS as training data for a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 13:

Admit that YOU are unaware of any instance in which a PERSON communicated to YOU that they chose not to purchase one or more of the ASSERTED WORKS due to that PERSON'S decision to instead use META AI MODELS.

REQUEST FOR ADMISSION NO. 14:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING a PERSON communicating to YOU that they chose not to purchase one or more of the ASSERTED WORKS due to that PERSON'S decision to instead use META AI MODELS.

REQUEST FOR ADMISSION NO. 15:

Admit that YOU have no DOCUMENTS EVIDENCING that any PERSON has offered any compensation to YOU for the use of any of the ASSERTED WORKS to train LLMs.

REQUEST FOR ADMISSION NO. 16:

Admit that YOU have no DOCUMENTS EVIDENCING that any PERSON has actually compensated YOU for use of any of the ASSERTED WORKS to train LLMs.

REQUEST FOR ADMISSION NO. 17:

Admit that YOU have no DOCUMENTS EVIDENCING that sales for the ASSERTED WORKS (including through any physical bookstore, online bookseller, or any other type of book wholesaler or retailer) decreased due to the alleged use of the ASSERTED WORKS to train GENERATIVE AI

1 TOOLS.

2 **REQUEST FOR ADMISSION NO. 18:**

3 Admit that YOU have no DOCUMENTS EVIDENCING that sales for the ASSERTED WORKS
4 (including through any physical bookstore, online bookseller, or any other type of book wholesaler or
5 retailer) decreased due to the alleged use of the ASSERTED WORKS to train META AI MODELS.

6 **REQUEST FOR ADMISSION NO. 19:**

7 Admit that YOU have not quantified how much of YOUR sales YOU allegedly lost due to the
8 use of the ASSERTED WORKS to develop or train any of the META AI MODELS.

9 **REQUEST FOR ADMISSION NO. 20:**

10 Admit that YOU have not quantified how much of YOUR sales YOU allegedly lost due to the
11 use of the ASSERTED WORKS to develop or train LLMs offered by THIRD PARTIES other than
12 Meta.

13 **REQUEST FOR ADMISSION NO. 21:**

14 Admit that, other than YOUR contention that LLM developers such as Meta should have
15 compensated YOU to allegedly use the ASSERTED WORKS to train LLMs, YOU are unaware of any
16 DOCUMENTS EVIDENCING any monetary injury that YOU have suffered due to any conduct of Meta
17 alleged in the COMPLAINT.

18 **REQUEST FOR ADMISSION NO. 22:**

19 Admit that YOU have used a GENERATIVE AI TOOL.

20 **REQUEST FOR ADMISSION NO. 23:**

21 Admit that YOU have used an LLM.

22 **REQUEST FOR ADMISSION NO. 24:**

23 Admit that YOU have used a META AI MODEL.

24 **REQUEST FOR ADMISSION NO. 25:**

25 Admit that each of the ASSERTED WORKS has been made available to the public.

26 **REQUEST FOR ADMISSION NO. 26:**

27 Admit that all of the ASSERTED WORKS are published.

REQUEST FOR ADMISSION NO. 27:

Admit that none of YOUR claims in the COMPLAINT are based on any of YOUR unpublished works.

REQUEST FOR ADMISSION NO. 28:

Admit that each of the ASSERTED WORKS had been made available to the public prior to the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 29:

Admit that the PUBLICATION DATE of each of the ASSERTED WORKS occurred before the commencement of the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 30:

Admit that the ASSERTED WORKS were all published prior to the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 31:

Admit that all of the ASSERTED WORKS are available to be read online either for free or for a fee.

REQUEST FOR ADMISSION NO. 32:

Admit that YOU do not contend that reviews of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 33:

Admit that YOU do not contend that reviews of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS unless they are substantially similar in protected expression.

REQUEST FOR ADMISSION NO. 34:

Admit that YOU do not contend that summaries of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 35:

Admit that YOU do not contend that summaries of the ASSERTED WORKS, whether prepared

1 by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS unless they are
2 substantially similar in protected expression.

3 **REQUEST FOR ADMISSION NO. 36:**

4 Admit that YOU are not aware of any DOCUMENTS EVIDENCING that any PERSON has
5 refused to license any of the ASSERTED WORKS due to any conduct of Meta.

6 **REQUEST FOR ADMISSION NO. 37:**

7 Admit that Meta did not create the Books3 dataset.

8 **REQUEST FOR ADMISSION NO. 38:**

9 Admit that YOU do not contend that Meta created the Books3 dataset.

10 **REQUEST FOR ADMISSION NO. 39:**

11 Admit that Meta did not create the LibGen (Library Genesis) dataset.

12 **REQUEST FOR ADMISSION NO. 40:**

13 Admit that YOU do not contend that Meta created the LibGen (Library Genesis) dataset.

14 **REQUEST FOR ADMISSION NO. 41:**

15 Admit that Meta did not create The Pile dataset.

16 **REQUEST FOR ADMISSION NO. 42:**

17 Admit that YOU do not contend that Meta created The Pile dataset.

18 **REQUEST FOR ADMISSION NO. 43:**

19 Admit that Meta did not create the Z-Library dataset.

20 **REQUEST FOR ADMISSION NO. 44:**

21 Admit that YOU do not contend that Meta created the Z-Library dataset.

22 **REQUEST FOR ADMISSION NO. 45:**

23 Admit that Meta did not create the Bibliotik dataset.

24 **REQUEST FOR ADMISSION NO. 46:**

25 Admit that YOU do not contend that Meta created the Bibliotik dataset.

26 **REQUEST FOR ADMISSION NO. 47:**

27 Admit that LLM developers other than Meta have used the Books3 dataset to train an LLM.
28

REQUEST FOR ADMISSION NO. 48:

Admit that LLM developers other than Meta have used the LibGen (Library Genesis) dataset to train an LLM.

REQUEST FOR ADMISSION NO. 49:

Admit that LLM developers other than Meta have used The Pile dataset to train an LLM.

REQUEST FOR ADMISSION NO. 50:

Admit that LLM developers other than Meta have used the Z-Library dataset to train an LLM.

REQUEST FOR ADMISSION NO. 51:

Admit that LLM developers other than Meta have used the Bibliotik dataset to train an LLM.

REQUEST FOR ADMISSION NO. 52:

Admit that YOU are aware that the ASSERTED WORKS have been a part of a dataset that has been used to train LLMs beyond META AI MODELS.

REQUEST FOR ADMISSION NO. 53:

Admit that YOU have been aware that the ASSERTED WORKS have been a part of a dataset that was used to train LLMs since before November 6, 2022.

REQUEST FOR ADMISSION NO. 54:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Books3 dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 55:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the LibGen (Library Genesis) dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 56:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed The Pile dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 57:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Z-Library dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 58:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Bibliotik dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 59:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Books3 dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 60:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the LibGen (Library Genesis) dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 61:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed The Pile dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 62:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Z-Library dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 63:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Bibliotik dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 64:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that a THIRD PARTY received an entire copy of any of the ASSERTED WORKS from Meta.

REQUEST FOR ADMISSION NO. 65:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that a THIRD PARTY received a copy of any of the ASSERTED WORKS from Meta that was capable of being read or viewed as legible text.

REQUEST FOR ADMISSION NO. 66:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that any THIRD PARTY

1 received from Meta any files or data that are substantially similar in protected expression to any
2 ASSERTED WORK.

3 **REQUEST FOR ADMISSION NO. 67:**

4 Admit that YOU cannot identify a single PERSON who received a legible copy of one of the
5 ASSERTED WORKS from Meta.

6 **REQUEST FOR ADMISSION NO. 68:**

7 Admit that YOU cannot identify a single PERSON who received an entire copy of any of the
8 ASSERTED WORKS from Meta.

9 **REQUEST FOR ADMISSION NO. 69:**

10 Admit that a THIRD PARTY does not need to purchase a copy of those ASSERTED WORKS
11 that are available to read on YOUR website through a subscription.

12 **REQUEST FOR ADMISSION NO. 70:**

13 Admit that YOU are not aware of any agreements to assign rights in or to the ASSERTED
14 WORKS that have not already been produced in this ACTION.

15 **REQUEST FOR ADMISSION NO. 71:**

16 Admit that YOU are aware that at least one of YOUR employees used META AI MODELS
17 prior to the filing of the COMPLAINT.

18 **REQUEST FOR ADMISSION NO. 72:**

19 Admit that YOU publish works on YOUR website that were edited or created using a
20 GENERATIVE AI TOOL.

21 **REQUEST FOR ADMISSION NO. 73:**

22 Admit that YOU have used GENERATIVE AI TOOLS other than META AI MODELS in
23 connection with at least one work published by YOU.

24 **REQUEST FOR ADMISSION NO. 74:**

25 Admit that YOU have used a WEB CRAWLER to download publicly available data from the
26 internet for the purpose of developing a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 75:

Admit that YOU have in YOUR possession, custody, or control data obtained from a WEB CRAWLER that includes unlicensed THIRD PARTY copyrighted works.

REQUEST FOR ADMISSION NO. 76:

Admit that YOU have downloaded at least one dataset that contains at least one THIRD PARTY copyrighted work without the authorization of that THIRD PARTY.

REQUEST FOR ADMISSION NO. 77:

Admit that YOU rely on the REGISTRATION MATERIALS identified in Dkt. 63-1 to establish ownership of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 78:

Admit that certain of the ASSERTED WORKS are later editions that claim copyright only in new and revised text and exclude material covered by prior registrations.

REQUEST FOR ADMISSION NO. 79:

Admit that for ASSERTED WORKS not registered as works made for hire, one or more non-Chicken Soup for the Soul, LLC employees are identified as authors.

REQUEST FOR ADMISSION NO. 80:

Admit that all of the ASSERTED WORKS are works of nonfiction.

REQUEST FOR ADMISSION NO. 81:

Admit that the general subject matter of each ASSERTED WORK is discussed in public sources available for free online.

REQUEST FOR ADMISSION NO. 82:

Admit that prior to filing the ACTION YOU did not identify specific META AI MODEL outputs that reproduce verbatim protected expression from any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 83:

Admit that YOU do not possess logs or other direct technical evidence that any META AI MODEL was trained on specific files containing any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 84:

Admit that YOU do not have any DOCUMENTS EVIDENCING that Meta “seeded” any ASSERTED WORK via BitTorrent.

REQUEST FOR ADMISSION NO. 85:

Admit that YOU have not conducted an analysis that isolates META AI MODELS (as opposed to other market factors or THIRD PARTY LLMs) as the cause of any alleged sales decline of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 86:

Admit that YOU have not conducted an analysis that isolates META AI MODELS (as opposed to other market factors or THIRD PARTY LLMs) as the cause of any alleged harm to the market for any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 87:

Admit that YOU did not conduct an analysis that isolates Generative AI (as opposed to other market factors) as the cause of any alleged sales decline of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 88:

Admit that YOU did not conduct an analysis that isolates Generative AI (as opposed to other market factors) as the cause of any alleged harm to the market for any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 89:

Admit that many of YOUR alleged market-harm theories assert displacement by LLM outputs generally rather than by META AI MODELS’ outputs reproducing the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 90:

Admit that some ASSERTED WORKS are collective issues of Chicken Soup for the Soul books and that YOU rely on collective-work registrations to claim rights in constituent contributions.

REQUEST FOR ADMISSION NO. 91:

Admit that YOU do not have a written assignment from every individual contributor of each collective book asserted by YOU in the COMPLAINT.

REQUEST FOR ADMISSION NO. 92:

Admit that YOU have not identified any PERSON who declined to purchase an ASSERTED WORK because of a META AI MODEL output.

REQUEST FOR ADMISSION NO. 93:

Admit that YOU have not identified any PERSON who declined to purchase an ASSERTED WORK because of a META AI MODEL output that reproduced protected expression from that ASSERTED WORK.

REQUEST FOR ADMISSION NO. 94:

Admit that YOU have not identified any PERSON who declined to purchase a subscription to access YOUR content because of a META AI MODEL output.

REQUEST FOR ADMISSION NO. 95:

Admit that YOU have not identified any PERSON who declined to purchase a subscription to access YOUR content because of a META AI MODEL output that reproduced protected expression from that ASSERTED WORK.

REQUEST FOR ADMISSION NO. 96:

Admit that YOU have developed an AI tool that creates content.

REQUEST FOR ADMISSION NO. 97:

Admit that YOU have published content on YOUR website that was created, in whole or in part, using Generative AI.

REQUEST FOR ADMISSION NO. 98:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul at work: 101 stories of courage, compassion and creativity in the workplace” (Registration No. TX0004435073) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 99:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the woman’s soul: 101 stories to open the hearts and rekindle the spirits of women” (Registration No.

TX0004429578) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 100:

Admit that YOU are not the author of the ASSERTED WORK entitled “A 4th course of chicken soup for the soul: 101 stories to open the heart and rekindle the spirit” (Registration No. TX0004529945) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 101:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the teenage soul: 101 stories of life, love, and learning” (Registration No. TX0004558165) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 102:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the Christian soul: 101 stories to open the heart and rekindle the spirit” (Registration No. TX0004648935) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 103:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for Little Souls: The Goodness Gorillas” (Registration No. TX0004561922) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 104:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the mother’s soul: 101 stories to open the hearts and rekindle the spirits of mothers” (Registration No. TX0004659718) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 105:

Admit that YOU are not the author of the ASSERTED WORK entitled “A 5th portion of Chicken Soup for the Soul: 101 more stories to open the heart and rekindle the spirit” (Registration No. TX0004679583) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 106:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for little souls: A dog of my own / story by Lisa McCourt” (Registration No. VA0000895623) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 107:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for little souls: the Braids girl / story by Lisa McCourt; illustrated by Tim Ladwig” (Registration No. VA0000895621) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 108:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Pet Lover’s Soul” (Registration No. TX0007134263) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 109:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the kid’s soul: 101 stories of courage, hope and laughter” (Registration No. TX0004839104) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 110:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Country Soul: Stories Served up Country-style and Straight from the Heart” (Registration No.

TX0004843929) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 111:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for little souls: the new kid and the cookie thief” (Registration No. VA0000950352) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 112:

Admit that YOU are not the author of the ASSERTED WORK entitled “A Second Chicken Soup for the Woman’s Soul” (Registration No. TX0007009481) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 113:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the teenage soul II: 101 more stories of life, love, and learning” (Registration No. TX0004889679) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 114:

Admit that YOU are not the author of the ASSERTED WORK entitled “A 6th bowl of Chicken Soup for the Soul: more stories to open the heart and rekindle the spirit” (Registration No. TX0005010358) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 115:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the couple’s soul: inspirational stories about love and relationships” (Registration No. TX0005010359) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 116:

1 Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the
2 golfer’s soul: 101 stories of insights, inspiration, and laughter on the links” (Registration No.
3 TX0005110480) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright
4 in such ASSERTED WORK vested.

5 **REQUEST FOR ADMISSION NO. 117:**

6 Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the
7 single’s soul: stories of love and inspiration for the single, divorced, and widowed” (Registration No.
8 TX0005160225) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright
9 in such ASSERTED WORK vested.

10 **REQUEST FOR ADMISSION NO. 118:**

11 Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the cat
12 & dog lover’s soul: celebrating pets as family with stories about cats, dogs and other critters” (Registration
13 No. TX0005123003) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the
14 copyright in such ASSERTED WORK vested.

15 **REQUEST FOR ADMISSION NO. 119:**

16 Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the
17 college soul: inspiring and humorous stories about college” (Registration No. TX0005123004) (as
18 “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED
19 WORK vested.

20 **REQUEST FOR ADMISSION NO. 120:**

21 Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the
22 college soul: inspiring and humorous stories about college” (Registration No. TX0006661372) (as
23 “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED
24 WORK vested.

REQUEST FOR ADMISSION NO. 121:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Golden Soul” (Registration No. TX0007009482) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 122:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the preteen soul: 101 stories of changes, choices and growing up for kids ages 9-13” (Registration No. TX0005261102) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 123:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the Christian family soul: stories to open and rekindle the spirit” (Registration No. TX0005210832) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 124:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Teenage Soul III” (Registration No. TX0007009472) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 125:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the writer’s soul: stories to open the heart and rekindle the spirit of writers” (Registration No. TX0005216797) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 126:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the expectant mother’s soul: 101 stories to inspire and warm the hearts of soon-to-be mothers” (Registration

No. TX0005216798) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 127:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the prisoner’s soul: 101 stories to open the heart and rekindle the spirit of hope, healing, and forgiveness” (Registration No. TX0005216794) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 128:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the parent’s soul: stories of loving, learning, and parenting” (Registration No. TX0005216793) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 129:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the sports fan’s soul” (Registration No. TX0005312525) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 130:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the mother’s soul: 2: more stories to open the hearts and rekindle the spirits of mothers” (Registration No. TX0005383808) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 131:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the teenage soul letters: letters of life, love, and learning” (Registration No. TX0005383807) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 132:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the father’s soul: stories to open the hearts and rekindle the spirits of fathers” (Registration No. TX0005414101) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 133:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the veteran’s soul: stories to stir the pride and honor the courage of our veterans” (Registration No. TX0005443498) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 134:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the nurse’s soul: 101 stories to celebrate, honor and inspire the nursing profession” (Registration No. TX0005872507) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 135:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the Jewish soul: stories to open the heart and rekindle the spirit” (Registration No. TX0005665105) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 136:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the baseball fan’s soul: inspirational stories of baseball, big-league dreams and the game of life” (Registration No. TX0005665104) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 137:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the teenage soul on tough stuff: stories of tough times and lessons learned” (Registration No. TX0005468866) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 138:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul Christmas treasury: holiday stories to warm the heart” (Registration No. TX0005676054) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 139:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the traveler’s soul: stories of adventure, inspiration and insight to celebrate the spirit of travel” (Registration No. TX0005505365) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 140:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul of America: stories to heal the heart of our nation” (Registration No. TX0005525555) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 141:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the grandparent’s soul” (Registration No. TX0005546454) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 142:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the teacher’s soul: stories to open the hearts and rekindle the spirits of educators” (Registration No. TX0005546431) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 143:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the golfer’s soul: the 2nd round: more stories of insight, inspiration, and laughter on the links” (Registration No. TX0005624714) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 144:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the volunteer’s soul: stories to celebrate the spirit of courage, caring, and community” (Registration No. TX0005609535) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 145:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the Canadian soul: stories to inspire and uplift the hearts of Canadians” (Registration No. TX0005867100) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 146:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the Christian woman’s soul: stories to open the heart and rekindle the spirit” (Registration No.

TX0005598141) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 147:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul Christmas treasury for kids” (Registration No. TX0005701347) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 148:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the teenage soul on love and friendship” (Registration No. TX0006678954) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 149:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the sister’s soul” (Registration No. TX0005700598) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 150:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the romantic soul: inspirations stories about love and romance” (Registration No. TX0005706370) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 151:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: cartoons for moms” (Registration No. TX0005733334) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 152:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup from the soul of Hawaii: stories of aloha to create paradise where you are” (Registration No. TX0005733010) (as

1 “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED
2 WORK vested.

3 **REQUEST FOR ADMISSION NO. 153:**

4 Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the
5 NASCAR soul: inspirational stories of courage, speed and overcoming adversity” (Registration No.
6 TX0005782936) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright
7 in such ASSERTED WORK vested.

8 **REQUEST FOR ADMISSION NO. 154:**

9 Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul
10 celebrates teachers: a collection in words and photographs” (Registration No. TX0005782912) (as
11 “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED
12 WORK vested.

13 **REQUEST FOR ADMISSION NO. 155:**

14 Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the
15 Christian teenage soul: stories of faith, love, inspiration, and hope” (Registration No. TX0005771475) (as
16 “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED
17 WORK vested.

18 **REQUEST FOR ADMISSION NO. 156:**

19 Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the
20 horse lover’s soul” (Registration No. TX0006678955) (as “author” is defined by 17 U.S.C. § 201(a)) in
21 whom initial ownership of the copyright in such ASSERTED WORK vested.

22 **REQUEST FOR ADMISSION NO. 157:**

23 Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the
24 working woman’s soul: humorous and inspirational stories to celebrate the many roles of working women”
25 (Registration No. TX0005827305) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial
26 ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 158:

Admit that YOU are not the author of the ASSERTED WORK entitled “Sopa de Pollo para Alma de la Mujer” (Registration No. TX0007190520) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 159:

Admit that YOU are not the author of the ASSERTED WORK entitled “Sopa de Pollo para el Alma de la Pareja” (Registration No. TX0007170553) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 160:

Admit that YOU are not the author of the ASSERTED WORK entitled “Una 2a Racion de Sopa de Pollo Para el Alma del Adolescente” (Registration No. TX0007190556) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 161:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: living your dreams: inspirational stories, powerful principles and practical techniques to help you make your dreams come true” (Registration No. TX0005799091) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 162:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the ocean lover’s soul: amazing sea stories and Wyland artwork to open the heart and rekindle the spirit” (Registration No. TX0005817046) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 163:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul celebrates mothers / a collection in words and photographs” (Registration No. TX0005859628) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 164:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup to inspire the body and soul: motivation and inspiration for living and loving a healthy lifestyle” (Registration No. TX0005918515) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 165:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the bride’s soul: stories of love, laughter and commitment to last a lifetime” (Registration No. TX0005947801) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 166:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul celebrates sisters: a collection in words and photos” (Registration No. TX0006016230) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 167:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the nature lover’s soul: inspiring stories of joy, insight and adventure in the great outdoors” (Registration No. TX0005947474) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 168:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul cartoons for teachers” (Registration No. TX0005970696) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 169:

Admit that YOU are not the author of the ASSERTED WORK entitled “Life lessons for women” (Registration No. TX0005970699) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 170:

Admit that YOU are not the author of the ASSERTED WORK entitled “Sopa de Pollo para el Alma de los Niños” (Registration No. TX0007190576) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 171:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the preteen soul 2: stories about facing challenges, realizing dreams and making a difference” (Registration No. TX0006008899) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 172:

Admit that YOU are not the author of the ASSERTED WORK entitled “Sopa de Pollo Para El Alma del Amante de Los Caballos” (Registration No. TX0007190535) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 173:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the African American soul: celebrating and sharing our culture one story at a time” (Registration No. TX0006055234) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 174:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul celebrates cats and the people who love them: a collection of words and photographs” (Registration No. TX0006073388) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 175:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul celebrates dogs and the people who love them: a collection in words and photographs” (Registration No. TX0006074861) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 176:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the teenage soul IV” (Registration No. TX0006684987) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 177:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the teenage soul IV” (Registration No. TX0006102983) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 178:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the single parent’s soul” (Registration No. TX0006155138) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 179:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for every mom’s soul” (Registration No. TX0006155139) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 180:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul Celebrates Grandmothers” (Registration No. TX0006998811) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 181:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the fisherman’s soul: fish tales to hook your spirit and snag your funny bone” (Registration No. TX0006261940) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 182:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the soul: menopause - original title Chicken Soup for the Soul Healthy Living Series: Menopause - title on assignments” (Registration No. TX0006183062) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 183:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the soul: weight loss” (Registration No. TX0006183064) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 184:

Admit that YOU are not the author of the ASSERTED WORK entitled “Heart disease - original title Chicken Soup for the Soul Healthy Living Series: Heart Disease - title on assignments” (Registration No. TX0006183463) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 185:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the miliary wife’s soul” (Registration No. TX0006193738) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 186:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the father & daughter soul” (Registration No. TX0006194803) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 187:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: cartoons for golfers” (Registration No. TX0006194781) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 188:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the caregiver’s soul: stories to inspire caregivers in the home, the community and the world” (Registration No. TX0006261937) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 189:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the recovering soul: your personal, portable support group with stories of healing, hope, love and resilience” (Registration No. TX0006261938) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 190:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the teenage soul: the real deal, school” (Registration No. TX0006194317) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 191:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the Latino soul: celebrating la comunidad Latina” (Registration No. TX0006234469) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 192:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the grandma’s soul: stories to honor and celebrate the ageless love of grandmothers” (Registration No. TX0006234473) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 193:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the girlfriend’s soul: celebrating the friends who cheer us up, cheer us on and make our lives complete” (Registration No. TX0006261939) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 194:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the girl’s soul: real stories by real girls about real stuff” (Registration No. TX0006245164) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 195:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: the book of Christmas virtues: inspirational stories to warm the heart” (Registration No. TX0006245127) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 196:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the soul: breast cancer - original title Chicken Soup for the Soul Healthy Living Series: Breast Cancer - title on assignments” (Registration No. TX0006183063) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 197:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the Latter-day Saint soul: stories celebrating the faith and family of Latter-day Saints” (Registration No. TX0006245165) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 198:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the cat lover’s soul” (Registration No. TX0006268644) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 199:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the dog lover’s soul” (Registration No. TX0006267435) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 200:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the teenage soul’s: the real deal: friends, best, worst, old, new, lost, false, true and more” (Registration No. TX0006295860) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 201:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the recovering soul: daily inspirations” (Registration No. TX0006309255) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 202:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the soul: daily inspirations for women” (Registration No. TX0006319342) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 203:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the dieter’s soul” (Registration No. TX0006521761) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 204:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the dieter’s soul, daily inspirations” (Registration No. TX0006520435) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 205:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for Christian soul 2: stories of faith, hope and healing” (Registration No. TX0006319332) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 206:

Admit that YOU are not the author of the ASSERTED WORK entitled “Arthritis - original title Chicken Soup for the Soul Healthy Living Series: Arthritis - title on assignments” (Registration No. TX0006467994) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 207:

Admit that YOU are not the author of the ASSERTED WORK entitled “Asthma - original title Chicken Soup for the Soul Healthy Living Series: Asthma - title on assignments” (Registration No. TX0006337882) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 208:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the horse lover’s soul: 2 - original title Chicken soup for the horse lover’s soul II - title on assignments” (Registration No. TX0006335117) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 209:

Admit that YOU are not the author of the ASSERTED WORK entitled “Diabetes - original title Chicken Soup for the Soul Healthy Living Series: Diabetes - title on assignments” (Registration No.

TX0006337883) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 210:

Admit that YOU are not the author of the ASSERTED WORK entitled “Stress - original title Chicken Soup for the Soul Healthy Living Series: Stress - title on assignments” (Registration No. TX0006335108) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 211:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the kid’s soul 2” (Registration No. TX0006319967) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 212:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the mother of preschooler’s soul” (Registration No. TX0006354495) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 213:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the teenage soul: real deal!: challenges” (Registration No. TX0006418116) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 214:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for scrapbooker’s soul” (Registration No. TX0006678956) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 215:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the scrapbooker’s soul” (Registration No. TX0006439274) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 216:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the African American woman’s soul” (Registration No. TX0006661373) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 217:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the African American woman’s soul” (Registration No. TX0006439198) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 218:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the entrepreneur’s soul” (Registration No. TX0006458516) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 219:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul Healthy Living Series: Back Pain - title on assignments” (Registration No. TX0006467993) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 220:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the breast cancer survivor’s soul” (Registration No. TX0006458515) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 221:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the sister’s soul 2” (Registration No. TX0006460128) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 222:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the shopper’s soul: celebrating bargains, boutiques and the perfect pair of shoes” (Registration No. TX0006518825) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 223:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the soul celebrating mothers and daughters” (Registration No. TX0006557479) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 224:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the new mom’s soul” (Registration No. TX0006579794) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 225:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken soup for the woman golfer’s soul” (Registration No. TX0006579795) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 226:

Admit that YOU are not the author of the ASSERTED WORK entitled “CHICKEN SOUP FOR THE BEACH LOVER’S SOUL” (Registration No. TX0006631098) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 227:

Admit that YOU are not the author of the ASSERTED WORK entitled “CHICKEN SOUP FOR THE SOUL: Healthy Living Series: MENOPAUSE” (Registration No. TX0006608635) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 228:

Admit that YOU are not the author of the ASSERTED WORK entitled “A Chicken Soup for the Soul Christmas” (Registration No. TX0006998836) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 229:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul in the Classroom Elementary Edition” (Registration No. TX0006984513) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 230:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul in the Classroom High School Edition” (Registration No. TX0006984522) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 231:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul in the Classroom Middle School Edition” (Registration No. TX0006984492) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 232:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul Children with Special Needs” (Registration No. TX0006984448) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 233:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul Celebrating Brother and Sisters” (Registration No. TX0006984306) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 234:

Admit that YOU are not the author of the ASSERTED WORK entitled “CHICKEN SOUP FOR THE SOUL KIDS IN THE KITCHEN” (Registration No. TX0006932944) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 235:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul Life Lessons for Loving the Way you Live” (Registration No. TX0006984419) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 236:

Admit that YOU are not the author of the ASSERTED WORK entitled “CHICKEN SOUP FOR THE WORKING MOM’S SOUL” (Registration No. TX0006984367) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 237:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Chocolate Lover’s Soul” (Registration No. TX0007002567) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 238:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Coffee Lover’s Soul” (Registration No. TX0007002570) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 239:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Tea Lover’s Soul” (Registration No. TX0007002572) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 240:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Wine Lover’s Soul” (Registration No. TX0007002568) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 241:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup For The Nurse’s Soul Second Dose” (Registration No. TX0007149557) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 242:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul Celebrating People Who Make a Difference” (Registration No. TX0007060795) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 243:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Adopted Soul” (Registration No. TX0007033830) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 244:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: A Tribute to Moms” (Registration No. TX0007033917) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 245:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul Love Stories” (Registration No. TX0007060784) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 246:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul Teens Talkin’ Faith” (Registration No. TX0007183630) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 247:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul Life Lessons for Mastering the Law Of Attraction” (Registration No. TX0007183724) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 248:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Father and Son’s Soul” (Registration No. TX0007178801) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 249:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Divorce and Recovery” (Registration No. TX0006957797) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 250:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Empty Nesters” (Registration No. TX0007134438) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 251:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Living Catholic Faith” (Registration No. TX0006941653) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 252:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Inside Basketball: 101 Great Hoop Stories from Players, Coaches, and Fans” (Registration No. TX0009503405) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 253:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: The Cancer Book: 101 Stories of Courage, Support & Love” (Registration No. TX0009503434) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 254:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Twins And More: 101 Stories Celebrating Double Trouble and Multiple Blessings” (Registration No. TX0009505681) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 255:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Power Moms: 101 Stories Celebrating the Power of Choice for Stay-at-Home and Work-from-Home Moms” (Registration No. TX0009505675) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 256:

Admit that YOU are not the author of the ASSERTED WORK entitled “CHICKEN SOUP FOR THE SOUL: EXTRAORDINARY TEENS Chicken Soup for the Soul: Extraordinary Teens: Personal Stories and Advice from Today’s Most Inspiring Youth” (Registration No. TX0009509429) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 257:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Devotional Stories For Women: 101 Daily Devotions to Comfort, Encourage, and Inspire Women” (Registration No. TX0009508136) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 258:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: NASCAR: 101 Stories of Family, Fortitude, and Fast Cars” (Registration No. TX0009520965) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 259:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Thanks Mom: 101 Stories of Gratitude, Love, and Good Times” (Registration No. TX0009517960) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 260:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Thanks Dad: 101 Stories of Gratitude, Love, and Good Times” (Registration No. TX0009503727) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 261:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: A Book Of Miracles: 101 True Stories of Healing, Faith, Divine Intervention, and Answered Prayers” (Registration No. TX0009503730) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 262:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Devotional Stories For Mothers: 101 Inspirational Stories about Counting Your Blessings and Having a Positive Attitude” (Registration No. TX0009503728) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 263:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: My Cat’s Life: 101 Stories about All the Ages and Stages of Our Feline Family Members” (Registration No. TX0009513033) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 264:

Admit that YOU are not the author of the ASSERTED WORK entitled “CHICKEN SOUP FOR THE SOUL: MY DOG’S LIFE” (Registration No. TX9562001) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 265:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Country Music: The Inspirational Stories behind 101 of Your Favorite Country Songs” (Registration No. TX0009513039) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 266:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Devotional Stories For Tough Times: 101 Daily Devotions to Inspire and Support You in Times of Need” (Registration No. TX0009504772) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 267:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Answered Prayers: 101 Stories of Hope, Miracles, Faith, Divine Intervention, and the Power of

Prayer” (Registration No. TX0009494280) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 268:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Stay-At-Home Moms: 101 Inspirational Stories for Mothers about Hard Work and Happy Families” (Registration No. TX0009519672) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 269:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Here Comes The Bride: 101 Stories of Love, Laughter, and Family” (Registration No. TX0009499619) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 270:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Boost Your Brain Power!: You Can Improve and Energize Your Brain at Any Age” (Registration No. TX0009499738) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 271:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Say Goodbye To Back Pain!: How to Handle Flare-Ups, Injuries, and Everyday Back Health” (Registration No. TX0009497370) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 272:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Say Goodbye To Stress: Manage Your Problems, Big and Small, Every Day” (Registration No. TX0009497369) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 273:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Say Hello To A Better Body!: Weight Loss and Fitness for Women Over 50” (Registration No. TX0009497367) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 274:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Child’s Soul” (Registration No. TX0009503373) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 275:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Hope & Healing For Your Breast Cancer Journey: Surviving and Thriving During and After Your Diagnosis and Treatment” (Registration No. TX0009508140) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 276:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Think Positive For Great Health: Use Your Mind to Promote Your Own Healing and Wellness” (Registration No. TX0009524287) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 277:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: I Can’t Believe My Cat Did That!: 101 Stories about the Crazy Antics of Our Feline Friends” (Registration No. TX0009503279) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 278:

Admit that YOU are not the author of the ASSERTED WORK entitled “Taste Of Chicken Soup For The Christian Family Soul” (Registration No. TX0009527621) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 279:

Admit that YOU are not the author of the ASSERTED WORK entitled “Taste Of Chicken Soup For The Christian Soul” (Registration No. TX0009527617) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 280:

Admit that YOU are not the author of the ASSERTED WORK entitled “Taste Of Chicken Soup For The Couple’s Soul” (Registration No. TX0009523108) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 281:

Admit that YOU are not the author of the ASSERTED WORK entitled “Taste Of Chicken Soup For The Grandparent’s Soul” (Registration No. TX0009523062) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 282:

Admit that YOU are not the author of the ASSERTED WORK entitled “TASTE OF CHICKEN SOUP FOR THE MOTHER’S SOUL 2” (Registration No. TX 9-542-041) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 283:

Admit that YOU are not the author of the ASSERTED WORK entitled “TASTE OF CHICKEN SOUP FOR THE TEENAGE SOUL III” (Registration No. TX 9-542-055) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 284:

Admit that YOU are not the author of the ASSERTED WORK entitled “TASTE OF CHICKEN SOUP TO INSPIRE A WOMAN’S SOUL” (Registration No. TX 9-544-036) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 285:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Finding My Faith: 101 Inspirational Stories about Life, Belief, and Spiritual Renewal” (Registration No. TX0009502702) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 286:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Devotional Stories For Wives: 101 Daily Devotions to Comfort, Encourage, and Inspire You” (Registration No. TX0009499485) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 287:

Admit that YOU are not the author of the ASSERTED WORK entitled “Sopa de Pollo para el Alma del Adolescente” (Registration No. TX0009506728) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 288:

Admit that YOU are not the author of the ASSERTED WORK entitled “Sopa de Pollo para el Alma del Trabajador” (Registration No. TX 9-506-725) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 289:

Admit that YOU are not the author of the ASSERTED WORK entitled “Un Tercer Plato de Sopa de Pollo para el Alma” (Registration No. TX0009506743) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 290:

Admit that YOU are not the author of the ASSERTED WORK entitled “Una 2a Ración de Sopa de Pollo para el Alma de la Mujer” (Registration No. TX0009503358) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 291:

Admit that YOU are not the author of the ASSERTED WORK entitled “Sopa de Pollo para Alma de la Madre” (Registration No. TX0009506730) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 292:

Admit that YOU are not the author of the ASSERTED WORK entitled “Sopa de Pollo para el Alma del Cristiano” (Registration No. TX0009506720) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 293:

Admit that YOU are not the author of the ASSERTED WORK entitled “Chicken Soup for the Soul: Devotional Stories For Mothers and Grandmothers: 101 Devotions with Scripture, Real-Life Stories & Custom Prayers” (Registration No. TX0009503510) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 294:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken soup for the mother and son soul” (Registration No. TX0006354494).

REQUEST FOR ADMISSION NO. 295:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Moms Know Best” (Registration No. TX0006882315).

REQUEST FOR ADMISSION NO. 296:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Preteens Talk” (Registration No. TX0006882313).

REQUEST FOR ADMISSION NO. 297:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Teens Talk Growing Up” (Registration No. TX0006882316).

REQUEST FOR ADMISSION NO. 298:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Loving Our Cats” (Registration No. TX0006878686).

REQUEST FOR ADMISSION NO. 299:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Loving Our Dogs” (Registration No. TX0006878689).

REQUEST FOR ADMISSION NO. 300:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Teens Talk Tough Times” (Registration No. TX0006878693).

REQUEST FOR ADMISSION NO. 301:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Older & Wiser” (Registration No. TX0006893278).

REQUEST FOR ADMISSION NO. 302:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Woman to Woman” (Registration No. TX0006893289).

REQUEST FOR ADMISSION NO. 303:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Dads & Daughters” (Registration No. TX0006892207).

REQUEST FOR ADMISSION NO. 304:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Grand and Great” (Registration No. TX0006892176).

REQUEST FOR ADMISSION NO. 305:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Happily Ever After” (Registration No. TX0006888650).

REQUEST FOR ADMISSION NO. 306:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Like Mother Like Daughter” (Registration No. TX0006888640).

REQUEST FOR ADMISSION NO. 307:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Moms & Sons” (Registration No. TX0006888659).

REQUEST FOR ADMISSION NO. 308:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Teens Talk Relationships” (Registration No. TX0006893283).

REQUEST FOR ADMISSION NO. 309:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: The Wisdom of Dads” (Registration No. TX0006892206).

REQUEST FOR ADMISSION NO. 310:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: On Being a Parent” (Registration No. TX0006947144).

REQUEST FOR ADMISSION NO. 311:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Christian Kids” (Registration No. TX0006957813).

REQUEST FOR ADMISSION NO. 312:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Christian Teen Talk” (Registration No. TX0006957806).

REQUEST FOR ADMISSION NO. 313:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Christmas Cheer” (Registration No. TX0006958028).

REQUEST FOR ADMISSION NO. 314:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Stories of Faith” (Registration No. TX0006957818).

REQUEST FOR ADMISSION NO. 315:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Tales of Golf and Sport” (Registration No. TX0006957790).

REQUEST FOR ADMISSION NO. 316:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “CHICKEN SOUP FOR THE SOUL: TEENS TALK HIGH SCHOOL: 101 Stories of Life, Love and Learning for Older Teens” (Registration No. TX9558849).

REQUEST FOR ADMISSION NO. 317:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Teens Talk Middle School: 101 Stories of Life, Love, and Learning for Younger Teens” (Registration No. TX0009502148).

REQUEST FOR ADMISSION NO. 318:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: My Resolution: 101 Stories? Great Ideas for Your Mind, Body, and? Wallet” (Registration No. TX0009510293).

REQUEST FOR ADMISSION NO. 319:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Campus Chronicles: 101 Inspirational, Supportive, and Humorous Stories about Life in College” (Registration No. TX0009506180).

REQUEST FOR ADMISSION NO. 320:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: The Golf Book: 101 Great Stories from the Course and the Clubhouse” (Registration No. TX0009506177).

REQUEST FOR ADMISSION NO. 321:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Tough Times, Tough People: 101 Stories about Overcoming the Economic Crisis and Other Challenges” (Registration No. TX0009506969).

REQUEST FOR ADMISSION NO. 322:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: What I Learned From The Cat: 101 Stories about Life, Love, and Lessons” (Registration No. TX0009499146).

REQUEST FOR ADMISSION NO. 323:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: What I Learned From The Dog: 101 Stories about Life, Love, and Lessons” (Registration No. TX0009510296).

REQUEST FOR ADMISSION NO. 324:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Count Your Blessings: 101 Stories of Gratitude, Fortitude, and Silver Linings” (Registration No. TX0009506968).

REQUEST FOR ADMISSION NO. 325:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: True Love: 101 Heartwarming and Humorous Stories about Dating, Romance, Love, and Marriage” (Registration No. TX0009517962).

REQUEST FOR ADMISSION NO. 326:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Teacher Tales: 101 Inspirational Stories from Great Teachers and Appreciative Students” (Registration No. TX0009520902).

REQUEST FOR ADMISSION NO. 327:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Runners: 101 Inspirational Stories of Energy, Endurance, and Endorphins” (Registration No. TX0009503726).

REQUEST FOR ADMISSION NO. 328:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Think Positive: 101 Daily Devotions to Comfort, Encourage, and Inspire Mothers” (Registration No. TX0009508617).

REQUEST FOR ADMISSION NO. 329:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Christmas Magic: 101 Holiday Tales of Inspiration, Love, and Wonder” (Registration No. TX0009508621).

REQUEST FOR ADMISSION NO. 330:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Family Matters: 101 Unforgettable Stories about Our Nutty but Lovable Families” (Registration No. TX0009508604).

REQUEST FOR ADMISSION NO. 331:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Tales Of Christmas: 101 Holiday Stories Bringing You All the Joy of the Season” (Registration No. TX0009518850).

REQUEST FOR ADMISSION NO. 332:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: The Gift Of Christmas: A Special Collection of Joyful Holiday Stories” (Registration No. TX0009527614).

REQUEST FOR ADMISSION NO. 333:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Shaping The New You: 101 Encouraging Stories about Dieting and Fitness? and Finding What Works for You” (Registration No. TX0009508610).

REQUEST FOR ADMISSION NO. 334:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Grieving And Recovery: 101 Inspirational and Comforting Stories about Surviving the Loss of a Loved One” (Registration No. TX0009503942).

REQUEST FOR ADMISSION NO. 335:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Grandmothers: 101 Stories of Love, Laughs, and Lessons from Grandmothers and Grandchildren” (Registration No. TX0009503652).

REQUEST FOR ADMISSION NO. 336:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Just For Preteens: 101 Stories of Inspiration and Support for Tweens” (Registration No. TX0009513026).

REQUEST FOR ADMISSION NO. 337:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Just For Teenagers: 101 Stories of Inspiration and Support for Teens” (Registration No. TX0009504771).

REQUEST FOR ADMISSION NO. 338:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Find Your Happiness: 101 Stories about Finding Your Purpose, Passion, and Joy.” (Registration No. TX0009494282).

REQUEST FOR ADMISSION NO. 339:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: O Canada: 101 Heartwarming and Inspiring Stories by and for Canadians” (Registration No. TX0009503365).

REQUEST FOR ADMISSION NO. 340:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Tough Times For Teens: 101 Stories about the Hardest Parts of Being a Teenager” (Registration No. TX0009504312).

REQUEST FOR ADMISSION NO. 341:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: The Magic Of Mothers & Daughters: 101 Inspirational and Entertaining Stories about That Special Bond” (Registration No. TX0009519717).

REQUEST FOR ADMISSION NO. 342:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Family Caregivers: 101 Stories of Love, Sacrifice, and Bonding” (Registration No. TX0009505915).

REQUEST FOR ADMISSION NO. 343:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Married Life!: 101 Inspirational Stories about Fun, Family, and Wedded Bliss” (Registration No. TX0009497368).

REQUEST FOR ADMISSION NO. 344:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: The Power of Positive: 101 Inspirational Stories about Changing Your Life through Positive Thinking” (Registration No. TX0009502708).

REQUEST FOR ADMISSION NO. 345:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Angels Among Us: 101 Inspirational Stories of Miracles, Faith, and Answered Prayers” (Registration No. TX0009507401).

REQUEST FOR ADMISSION NO. 346:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Billy Graham & Me: 101 Inspiring Personal Stories from Presidents, Pastors, Performers, and Other People Who Know Him Well” (Registration No. TX0009514752).

REQUEST FOR ADMISSION NO. 347:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Parenthood: 101 Heartwarming and Humorous Stories about the Joys of Raising Children of All Ages” (Registration No. TX0009507392).

REQUEST FOR ADMISSION NO. 348:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Raising Kids On The Spectrum: 101 Inspirational Stories for Parents of Children with Autism and Asperger?s” (Registration No. TX0009507407).

REQUEST FOR ADMISSION NO. 349:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Inspiration For Writers: 101 Motivational Stories for Writers ? Budding or Bestselling ? from Books to Blogs” (Registration No. TX0009507385).

REQUEST FOR ADMISSION NO. 350:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: 20th Anniversary” (Registration No. TX0009505558).

REQUEST FOR ADMISSION NO. 351:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Reader’s Choice 20th Anniversary Edition: The Chicken Soup for the Soul Stories that Changed Your Lives” (Registration No. TX0009513495).

REQUEST FOR ADMISSION NO. 352:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “The Original! Chicken Soup for the Soul: 20th Anniversary Edition: All Your Favorite Original Stories Plus 20 Bonus Stories for the Next 20 Years” (Registration No. TX0009489379).

REQUEST FOR ADMISSION NO. 353:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: From Lemons To Lemonade: 101 Positive, Practical, and Powerful Stories about Making the Best of a Bad Situation” (Registration No. TX0009499480).

REQUEST FOR ADMISSION NO. 354:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: It’s Christmas: 101 Joyful Stories about the Love, Fun, and Wonder of the Holidays” (Registration No. TX0009493911).

REQUEST FOR ADMISSION NO. 355:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Miraculous Messages From Heaven: 101 Stories of Eternal Love, Powerful Connections, and Divine Signs from Beyond” (Registration No. TX0009493913).

REQUEST FOR ADMISSION NO. 356:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Think Positive For Kids: 101 Stories about Good Decisions, Self-Esteem, and Positive Thinking” (Registration No. TX0009503676).

REQUEST FOR ADMISSION NO. 357:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Just Us Girls: 101 Stories about Friendship for Women of All Ages” (Registration No. TX0009503672).

REQUEST FOR ADMISSION NO. 358:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: O Canada The Wonders Of Winter: 101 Stories about Bad Weather, Good Times, and Great Sports” (Registration No. TX0009503673).

REQUEST FOR ADMISSION NO. 359:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: The Dating Game: 101 Stories about Looking for Love and Finding Fairytale Romance!” (Registration No. TX0009503671).

REQUEST FOR ADMISSION NO. 360:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Miracles Happen: 101 Inspirational Stories about Hope, Answered Prayers, and Divine Intervention” (Registration No. TX0009503674).

REQUEST FOR ADMISSION NO. 361:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: The Multitasking Mom’s Survival Guide: 101 Inspiring and Amusing Stories for Mothers Who Do It All” (Registration No. TX0009498314).

REQUEST FOR ADMISSION NO. 362:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Living With Alzheimer’s & Other Dementias: 101 Stories of Caregiving, Coping, and Compassion” (Registration No. TX0009504774).

REQUEST FOR ADMISSION NO. 363:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Home Sweet Home: 101 Stories about Hearth, Happiness, and Hard Work” (Registration No. TX0009505677).

REQUEST FOR ADMISSION NO. 364:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Recovering From Traumatic Brain Injuries: 101 Stories of Hope, Healing, and Hard Work” (Registration No. TX0009505685).

REQUEST FOR ADMISSION NO. 365:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Reboot Your Life: 101 Stories about Finding a New Path to Happiness” (Registration No. TX0009502938).

REQUEST FOR ADMISSION NO. 366:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: The Power of Forgiveness: 101 Stories about How to Let Go and Change Your Life” (Registration No. TX0009503154).

REQUEST FOR ADMISSION NO. 367:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Thanks To My Mom: 101 Stories of Gratitude, Love, and Lessons” (Registration No. TX0009506717).

REQUEST FOR ADMISSION NO. 368:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Be Best You Can Be” (Registration No. TX0009503353).

REQUEST FOR ADMISSION NO. 369:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: The Joy of Adoption: 101 Stories about Forever Families and Meant-to-Be Kids” (Registration No. TX0009506723).

REQUEST FOR ADMISSION NO. 370:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Time To Thrive: 101 Inspiring Stories about Growth, Wisdom, and Dreams” (Registration No. TX0009509425).

REQUEST FOR ADMISSION NO. 371:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Create Best Future” (Registration No. TX0009503367).

REQUEST FOR ADMISSION NO. 372:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Inspiration For Nurses: 101 Stories of Appreciation & Wisdom” (Registration No. TX0009510300).

REQUEST FOR ADMISSION NO. 373:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Raising Great Kids” (Registration No. TX0009503350).

REQUEST FOR ADMISSION NO. 374:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Dreams & Premonitions: 101 Amazing Stories of Miracles, Divine Intervention, and Insight” (Registration No. TX0009510285).

REQUEST FOR ADMISSION NO. 375:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Think Possible: 101 Stories about Using a Positive Attitude to Improve Your Life” (Registration No. TX0009499149).

REQUEST FOR ADMISSION NO. 376:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: The Joy of Less: 101 Stories About Having More By Simplifying Our Lives” (Registration No. TX0009506605).

REQUEST FOR ADMISSION NO. 377:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: The Power of Gratitude: 101 Stories About How Being Thankful Can Change Your Life” (Registration No. TX0009509422).

REQUEST FOR ADMISSION NO. 378:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Curvy & Confident: 101 Stories About Loving Yourself and Your Body” (Registration No. TX0009504872).

REQUEST FOR ADMISSION NO. 379:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Inspiration For Teachers: 101 Stories About How You Make A Difference” (Registration No. TX0009498322).

REQUEST FOR ADMISSION NO. 380:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: The Spirit Of Canada: 101 Stories of Love and Gratitude” (Registration No. TX0009504924).

REQUEST FOR ADMISSION NO. 381:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Dreams And The Unexplainable: 101 Eye-Opening Stories About Premonitions and Miracles” (Registration No. TX0009523432).

REQUEST FOR ADMISSION NO. 382:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Think, Act & Be Happy: How to Use Chicken Soup for the Soul Stories to Train Your Brain to Be Your Own Therapist” (Registration No. TX0009500525).

REQUEST FOR ADMISSION NO. 383:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Running For Good: 101 Stories for Runner’s & Walkers To Get You Going!” (Registration No. TX0009506757).

REQUEST FOR ADMISSION NO. 384:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: Think Positive, Live Happy: 101 Stories About Creating Your Best Life” (Registration No. TX0009485900).

REQUEST FOR ADMISSION NO. 385:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: I’m Speaking Now: Black Women Share Their Truth in 101 Stories of Love, Courage and Hope” (Registration No. TX0009503320).

REQUEST FOR ADMISSION NO. 386:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Preteen Soul: 21st Anniversary Edition: An Update of the 2000 Classic” (Registration No. TX0009513496).

REQUEST FOR ADMISSION NO. 387:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Teenage Soul: 25th Anniversary Edition: An Update of the 1997 Classic” (Registration No. TX0009503399).

REQUEST FOR ADMISSION NO. 388:

Admit that one or more THIRD PARTIES wrote one or more portions of the ASSERTED WORK entitled “Chicken Soup for the Soul: 30th Anniversary Edition” (Registration No. TX0009513099).

REQUEST FOR ADMISSION NO. 389:

Admit that YOU cannot identify by name any THIRD PARTY who allegedly received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 390:

Admit that YOU have no documents showing that a THIRD PARTY received from Meta via TORRENTING a complete READABLE copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 391:

Admit that YOU have no documents showing that a THIRD PARTY received from Meta via TORRENTING a copy of any section or portion of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 392:

Admit that YOU are unable to identify by name any THIRD PARTY who read a copy of one of YOUR ASSERTED WORKS that the THIRD PARTY received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 393:

Admit that YOU have no evidence of how any THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS later used that copy.

REQUEST FOR ADMISSION NO. 394:

Admit that YOU have no evidence showing that a THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS did not use that copy for purposes of commentary or criticism.

REQUEST FOR ADMISSION NO. 395:

Admit that YOU have no evidence showing that a THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS did not use that copy for a fair use purpose under 17 U.S.C. § 107.

REQUEST FOR ADMISSION NO. 396:

Admit that YOU have not spoken with any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 397:

Admit that YOU have not contacted any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 398:

Admit that YOU have not identified any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 399:

Admit that YOU are unable to identify any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS that engaged in direct copyright infringement of the same ASSERTED WORK.

REQUEST FOR ADMISSION NO. 400:

Admit that YOU cannot identify any direct copyright infringement committed by a THIRD PARTY who allegedly received from Meta via TORRENTING any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 401:

Admit that, for any of YOUR ASSERTED WORKS that were allegedly uploaded by Meta via TORRENTING, YOU have no evidence that YOUR ASSERTED WORKS were READABLE.

REQUEST FOR ADMISSION NO. 402:

Admit that YOU have no documents evidencing that anybody read ANY of YOUR ASSERTED WORKS as a result of receiving that work from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 403:

Admit that YOU do not know whether any THIRD PARTY read a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 404:

Admit that YOU do not know whether any THIRD PARTY displayed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 405:

Admit that YOU do not know whether any THIRD PARTY redistributed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 406:

Admit that YOU do not know whether any THIRD PARTY performed any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 407:

Admit that YOU do not know whether any THIRD PARTY made fair use of a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 408:

Admit that YOU do not know whether any THIRD PARTY'S use of any ASSERTED WORK received from Meta via TORRENTING was not fair use.

REQUEST FOR ADMISSION NO. 409:

Admit that YOU have no documents evidencing whether any THIRD PARTY read a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 410:

Admit that YOU have no documents evidencing whether any THIRD PARTY displayed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 411:

Admit that YOU have no documents evidencing whether any THIRD PARTY redistributed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 412:

Admit that YOU have no documents evidencing whether any THIRD PARTY performed any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 413:

Admit that YOU have no documents evidencing whether any THIRD PARTY made fair use of a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 414:

Admit that YOU have no documents evidencing that any THIRD PARTY'S use of any ASSERTED WORK received from Meta via TORRENTING was not fair use.

REQUEST FOR ADMISSION NO. 415:

Admit that YOU cannot identify how many complete copies of YOUR ASSERTED WORKS were allegedly distributed by Meta via TORRENTING to any THIRD PARTY. Complete means all pages of the ASSERTED WORK are present.

REQUEST FOR ADMISSION NO. 416:

Admit that YOU cannot identify any complete copy of YOUR ASSERTED WORKS that was distributed by Meta via TORRENTING to a THIRD PARTY.

REQUEST FOR ADMISSION NO. 417:

Admit that YOU have no documents evidencing that YOU lost any book sales because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 418:

Admit that YOU have no documents evidencing that YOU lost any revenue because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 419:

Admit that YOU are unable to calculate any revenue lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 420:

Admit that YOU are unable to identify a specific subscription that YOU lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 421:

Admit that YOU are unable to identify a specific book sale that YOU lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

1 Dated: July 31, 2026

2 /s/: Meryl Governski
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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 ADMISSION**

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

on the following party(ies) in this action:

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Executed on July 31, 2026, at Washington, D.C.

/s/ Meryl Governski

[counsel listed on signature page]

**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
ADMISSION**

Trial Date: None

Date Action Filed: May 4, 2026

Judge: The Hon. V. Chhabria

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: COGNELLA, INC.

SET NUMBER: ONE

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Plaintiff Cognella, Inc. (“Plaintiff”) admit or deny, separately and in writing under oath, each of the matters set forth below (the “Requests”).

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, Inc. 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 WORK/ASSERTED WORKS means YOUR purportedly copyrighted works that YOU have alleged in the ACTION and/or COMPLAINT that Meta has allegedly infringed.

5. PUBLICATION DATE means the first date on which: (a) a copy of an ASSERTED WORK, in any format, was distributed to the public or to YOUR subscribers by sale or other transfer of ownership, or by rental, lease or lending, or (b) YOU offered to distribute copies of an ASSERTED WORK in any format to a group of persons for purposes of further distribution, public performance, or public display.

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

7. GENERATIVE AI TOOL means any artificial intelligence (“AI”) system capable of

1 producing text, images, audio, video, or other audiovisual content (e.g., large language models and
2 diffusion models), including but not limited to ChatGPT, Gemini, Claude, Microsoft Copilot, Meta.AI,
3 and Llama—including any and all versions or models thereof—and any internal or proprietary system,
4 tool, or platform with any such capabilities.

5 8. LLM means a generative AI large language model.

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

8 10. WEB CRAWLER means any automated program, script, bot, spider, or software agent
9 that systematically browses, indexes, downloads, or scrapes content from the internet, including without
10 limitation any tool used to harvest, collect, or copy text, data, files, or other content from web pages or
11 online repositories.

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

16 12. THIRD PARTY means all PERSONS other than YOU and Meta.

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

20 14. COMMUNICATION(S) is used in its broadest sense and means any transmission of
21 information from one PERSON to another by any means, including without limitation written
22 communications, telephone communications, in person communications, email, texts, Slack, instant
23 messaging, and other electronic communications.

24 15. DOCUMENT(S) means the original and all non-identical copies (including drafts and
25 those with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as defined in
26 Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil Procedure 34,
27 and includes papers of all kinds and information stored electronically, including by way of example and
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without limitation, electronic mail, letters, communications, memoranda, notes, computer generated data, calendars, records, minutes, studies, reports, notebooks, messages, telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data, source code, data compilation, pictures, photographs, books, pamphlets, publications, advertisements, sales literature, brochures, manuals, price lists, announcements, and any other writings, records, or tangible objects produced or reproduced mechanically, electrically, electronically, photographically, or chemically. The term also includes any parent or child attachment or other documents embedded or linked in any way to a requested DOCUMENT.

16. CONCERNING or REFERRING or RELATING or REFLECTING or EVIDENCING are used interchangeably and shall mean constituting, relating to, reflecting, regarding, memorializing, identifying, embodying, referring to, pertaining to, commenting on, discussing, analyzing, considering, describing, containing, consisting of, connected to, indicating, supporting, or refuting.

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

INSTRUCTIONS

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

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

3. Meta requests that YOU admit or deny the truth of each statement or fact, application of law to fact, or opinions about either, set forth in the Requests below.

4. To the extent that YOU do not respond with either an unqualified admission or an objection (the reasons for which must be stated), YOU shall specifically deny the matter and set forth in

1 detail the reasons why YOU cannot truthfully admit the matter. Any such denial shall fairly meet the
2 substance of the Request, and when good faith requires that YOU qualify an answer or deny only a part
3 of the matter in which any admission is requested, YOU shall specify so much of it as is true and qualify
4 or deny the remainder.

5 5. If, in responding to these Requests, YOU encounter any ambiguities when construing a
6 Request, instruction, or definition, YOU shall set forth in YOUR response the matter deemed ambiguous
7 and the construction used in responding.

8 6. YOU may not give lack of information or knowledge as the reason for failure to admit
9 or deny unless YOU state that YOU have made reasonable inquiry and that the information known or
10 readily obtainable by YOU is insufficient to enable YOU to admit or deny.

11 7. The fact that a Request covers a matter which YOU believe presents a genuine issue for
12 trial may not, on that ground alone, provide the basis for an objection.

13 8. If a Request is silent as to the time period for which information is sought, YOUR
14 response should include all information known to YOU CONCERNING events that occurred, in whole
15 or in part, at any time during the period of 2021 to the present except for the Requests relating to
16 Plaintiff's works, which should go back to the creation of the particular work(s) at issue.

17 9. Any Request set forth below to which there has not been an adequate and timely response
18 may be deemed admitted and, therefore, conclusively established for purposes of this ACTION.

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

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

25 Admit that YOU are unaware of any lost sales of any ASSERTED WORK due to any conduct
26 of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 2:

1 Admit that YOU are unaware of any DOCUMENTS EVIDENCING that YOU have lost any
2 sales of any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

3 **REQUEST FOR ADMISSION NO. 3:**

4 Admit that YOU are unaware of any specific licensing opportunity that YOU lost for any
5 ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

6 **REQUEST FOR ADMISSION NO. 4:**

7 Admit that YOU are unaware of any DOCUMENTS EVIDENCING that YOU lost any specific
8 licensing opportunity for any ASSERTED WORK due to any conduct of Meta alleged in the
9 COMPLAINT.

10 **REQUEST FOR ADMISSION NO. 5:**

11 Admit that YOU are unaware of any PERSON that has opted not to purchase one of the
12 ASSERTED WORKS due to that PERSON's use of META AI MODELS.

13 **REQUEST FOR ADMISSION NO. 6:**

14 Admit that YOU are unaware of any DOCUMENTS EVIDENCING that any PERSON has
15 opted not to purchase one of the ASSERTED WORKS due to that PERSON's use of META AI
16 MODELS.

17 **REQUEST FOR ADMISSION NO. 7:**

18 Admit that, for each ASSERTED WORK, more than fifty percent (50%) of all gross revenue
19 was generated within the three (3) years immediately following its PUBLICATION DATE.

20 **REQUEST FOR ADMISSION NO. 8:**

21 Admit that no THIRD PARTY has offered YOU compensation to use any of the ASSERTED
22 WORKS to train a GENERATIVE AI TOOL.

23 **REQUEST FOR ADMISSION NO. 9:**

24 Admit that YOU are unaware of any COMMUNICATIONS preceding the initiation of the
25 ACTION in which a THIRD PARTY offered or engaged in discussions concerning the potential to offer
26 YOU compensation to use any of the ASSERTED WORKS to train a GENERATIVE AI TOOL.

27 **REQUEST FOR ADMISSION NO. 10:**

1 Admit that YOU have never licensed any of the ASSERTED WORKS for actual or potential use
2 in connection with development of a GENERATIVE AI TOOL.

3 **REQUEST FOR ADMISSION NO. 11:**

4 Admit that YOU are unaware of any of the ASSERTED WORKS ever having been licensed for
5 actual or potential use in connection with the development of a GENERATIVE AI TOOL.

6 **REQUEST FOR ADMISSION NO. 12:**

7 Admit that YOU have not granted another PERSON the right to license the ASSERTED
8 WORKS as training data for a GENERATIVE AI TOOL.

9 **REQUEST FOR ADMISSION NO. 13:**

10 Admit that YOU are unaware of any instance in which a PERSON communicated to YOU that
11 they chose not to purchase one or more of the ASSERTED WORKS due to that PERSON's decision to
12 instead use META AI MODELS.

13 **REQUEST FOR ADMISSION NO. 14:**

14 Admit that YOU are unaware of any DOCUMENTS EVIDENCING a PERSON communicating
15 to YOU that they chose not to purchase one or more of the ASSERTED WORKS due to that PERSON's
16 decision to instead use META AI MODELS.

17 **REQUEST FOR ADMISSION NO. 15:**

18 Admit that YOU have no DOCUMENTS EVIDENCING that any PERSON has offered any
19 compensation to YOU for the use of any of the ASSERTED WORKS to train LLMs.

20 **REQUEST FOR ADMISSION NO. 16:**

21 Admit that YOU have no DOCUMENTS EVIDENCING that any PERSON has actually
22 compensated YOU for use of any of the ASSERTED WORKS to train LLMs.

23 **REQUEST FOR ADMISSION NO. 17:**

24 Admit that YOU have no DOCUMENTS EVIDENCING that sales for the ASSERTED WORKS
25 (including through any physical bookstore, online bookseller, or any other type of book wholesaler or
26 retailer) decreased due to the alleged use of the ASSERTED WORKS to train GENERATIVE AI
27 TOOLS.

REQUEST FOR ADMISSION NO. 18:

Admit that YOU have no DOCUMENTS EVIDENCING that sales for the ASSERTED WORKS (including through any physical bookstore, online bookseller, or any other type of book wholesaler or retailer) decreased due to the alleged use of the ASSERTED WORKS to train META AI MODELS.

REQUEST FOR ADMISSION NO. 19:

Admit that YOU have not quantified how much of YOUR sales YOU allegedly lost due to the use of the ASSERTED WORKS to develop or train any of the META AI MODELS.

REQUEST FOR ADMISSION NO. 20:

Admit that YOU have not quantified how much of YOUR sales YOU allegedly lost due to the use of the ASSERTED WORKS to develop or train LLMs offered by THIRD PARTIES other than Meta.

REQUEST FOR ADMISSION NO. 21:

Admit that, other than YOUR contention that LLM developers such as Meta should have compensated YOU to allegedly use the ASSERTED WORKS to train LLMs, YOU are unaware of any DOCUMENTS EVIDENCING any monetary injury that YOU have suffered due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 22:

Admit that YOU have used a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 23:

Admit that YOU have used an LLM.

REQUEST FOR ADMISSION NO. 24:

Admit that YOU have used a META AI MODEL.

REQUEST FOR ADMISSION NO. 25:

Admit that each of the ASSERTED WORKS has been made available to the public.

REQUEST FOR ADMISSION NO. 26:

Admit that all of the ASSERTED WORKS are published.

REQUEST FOR ADMISSION NO. 27:

1 Admit that none of YOUR claims in the COMPLAINT are based on any of YOUR unpublished
2 works.

3 **REQUEST FOR ADMISSION NO. 28:**

4 Admit that each of the ASSERTED WORKS had been made available to the public prior to the
5 purported infringement alleged in the COMPLAINT.

6 **REQUEST FOR ADMISSION NO. 29:**

7 Admit that the PUBLICATION DATE of each of the ASSERTED WORKS occurred before the
8 commencement of the purported infringement alleged in the COMPLAINT.

9 **REQUEST FOR ADMISSION NO. 30:**

10 Admit that the ASSERTED WORKS were all published prior to the purported infringement
11 alleged in the COMPLAINT.

12 **REQUEST FOR ADMISSION NO. 31:**

13 Admit that all of the ASSERTED WORKS are available to be read online either for free or for a
14 fee.

15 **REQUEST FOR ADMISSION NO. 32:**

16 Admit that YOU do not contend that reviews of the ASSERTED WORKS, whether prepared by
17 a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS.

18 **REQUEST FOR ADMISSION NO. 33:**

19 Admit that YOU do not contend that reviews of the ASSERTED WORKS, whether prepared by
20 a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS unless they are
21 substantially similar in protected expression.

22 **REQUEST FOR ADMISSION NO. 34:**

23 Admit that YOU do not contend that summaries of the ASSERTED WORKS, whether prepared
24 by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS.

25 **REQUEST FOR ADMISSION NO. 35:**

26 Admit that YOU do not contend that summaries of the ASSERTED WORKS, whether prepared
27 by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS unless they are
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substantially similar in protected expression.

REQUEST FOR ADMISSION NO. 36:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that any PERSON has refused to license any of the ASSERTED WORKS due to any conduct of Meta.

REQUEST FOR ADMISSION NO. 37:

Admit that Meta did not create the Books3 dataset.

REQUEST FOR ADMISSION NO. 38:

Admit that YOU do not contend that Meta created the Books3 dataset.

REQUEST FOR ADMISSION NO. 39:

Admit that Meta did not create the LibGen (Library Genesis) dataset.

REQUEST FOR ADMISSION NO. 40:

Admit that YOU do not contend that Meta created the LibGen (Library Genesis) dataset.

REQUEST FOR ADMISSION NO. 41:

Admit that Meta did not create The Pile dataset.

REQUEST FOR ADMISSION NO. 42:

Admit that YOU do not contend that Meta created The Pile dataset.

REQUEST FOR ADMISSION NO. 43:

Admit that Meta did not create the Z-Library dataset.

REQUEST FOR ADMISSION NO. 44:

Admit that YOU do not contend that Meta created the Z-Library dataset.

REQUEST FOR ADMISSION NO. 45:

Admit that Meta did not create the Bibliotik dataset.

REQUEST FOR ADMISSION NO. 46:

Admit that YOU do not contend that Meta created the Bibliotik dataset.

REQUEST FOR ADMISSION NO. 47:

Admit that LLM developers other than Meta have used the Books3 dataset to train an LLM.

REQUEST FOR ADMISSION NO. 48:

Admit that LLM developers other than Meta have used the LibGen (Library Genesis) dataset to train an LLM.

REQUEST FOR ADMISSION NO. 49:

Admit that LLM developers other than Meta have used The Pile dataset to train an LLM.

REQUEST FOR ADMISSION NO. 50:

Admit that LLM developers other than Meta have used the Z-Library dataset to train an LLM.

REQUEST FOR ADMISSION NO. 51:

Admit that LLM developers other than Meta have used the Bibliotik dataset to train an LLM.

REQUEST FOR ADMISSION NO. 52:

Admit that YOU are aware that the ASSERTED WORKS have been a part of a dataset that has been used to train LLMs beyond META AI MODELS.

REQUEST FOR ADMISSION NO. 53:

Admit that YOU have been aware that the ASSERTED WORKS have been a part of a dataset that was used to train LLMs since before November 6, 2022.

REQUEST FOR ADMISSION NO. 54:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Books3 dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 55:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the LibGen (Library Genesis) dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 56:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed The Pile dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 57:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Z-Library dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 58:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Bibliotik dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 59:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Books3 dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 60:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the LibGen (Library Genesis) dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 61:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed The Pile dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 62:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Z-Library dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 63:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Bibliotik dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 64:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that a THIRD PARTY received an entire copy of any of the ASSERTED WORKS from Meta.

REQUEST FOR ADMISSION NO. 65:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that a THIRD PARTY received a copy of any of the ASSERTED WORKS from Meta that was capable of being read or viewed as legible text.

REQUEST FOR ADMISSION NO. 66:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that any THIRD PARTY

received from Meta any files or data that are substantially similar in protected expression to any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 67:

Admit that YOU cannot identify a single PERSON who received a legible copy of one of the ASSERTED WORKS from Meta.

REQUEST FOR ADMISSION NO. 68:

Admit that YOU cannot identify a single PERSON who received an entire copy of any of the ASSERTED WORKS from Meta.

REQUEST FOR ADMISSION NO. 69:

Admit that a THIRD PARTY does not need to purchase a copy of those ASSERTED WORKS that are available to read on YOUR website through a subscription.

REQUEST FOR ADMISSION NO. 70:

Admit that YOU are not aware of any agreements to assign rights in or to the ASSERTED WORKS that have not already been produced in this ACTION.

REQUEST FOR ADMISSION NO. 71:

Admit that YOU are aware that at least one of YOUR employees used META AI MODELS prior to the filing of the COMPLAINT.

REQUEST FOR ADMISSION NO. 72:

Admit that YOU publish works on YOUR website that were edited or created using a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 73:

Admit that YOU have used GENERATIVE AI TOOLS other than META AI MODELS in connection with at least one work published by YOU.

REQUEST FOR ADMISSION NO. 74:

Admit that YOU have used a WEB CRAWLER to download publicly available data from the internet for the purpose of developing a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 75:

1 Admit that YOU have in YOUR possession, custody, or control data obtained from a WEB
2 CRAWLER that includes unlicensed THIRD PARTY copyrighted works.

3 **REQUEST FOR ADMISSION NO. 76:**

4 Admit that YOU have downloaded at least one dataset that contains at least one THIRD PARTY
5 copyrighted work without the authorization of that THIRD PARTY.

6 **REQUEST FOR ADMISSION NO. 77:**

7 Admit that YOU rely on the REGISTRATION MATERIALS identified in Dkt. 63-1 to establish
8 ownership of the ASSERTED WORKS.

9 **REQUEST FOR ADMISSION NO. 78:**

10 Admit that certain of the ASSERTED WORKS are later editions that claim copyright only in
11 new and revised text and exclude material covered by prior registrations.

12 **REQUEST FOR ADMISSION NO. 79:**

13 Admit that for ASSERTED WORKS not registered as works made for hire, one or more non-
14 Cognella, Inc. employees are identified as authors.

15 **REQUEST FOR ADMISSION NO. 80:**

16 Admit that all of the ASSERTED WORKS are works of nonfiction.

17 **REQUEST FOR ADMISSION NO. 81:**

18 Admit that the general subject matter of each ASSERTED WORK is discussed in public sources
19 available for free online.

20 **REQUEST FOR ADMISSION NO. 82:**

21 Admit that prior to filing the ACTION YOU did not identify specific META AI MODEL outputs
22 that reproduce verbatim protected expression from any ASSERTED WORK.

23 **REQUEST FOR ADMISSION NO. 83:**

24 Admit that YOU do not possess logs or other direct technical evidence that any META AI
25 MODEL was trained on specific files containing any ASSERTED WORK.

26 **REQUEST FOR ADMISSION NO. 84:**

27 Admit that YOU do not have any DOCUMENTS EVIDENCING that Meta “seeded” any
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1 ASSERTED WORK via BitTorrent.

2 **REQUEST FOR ADMISSION NO. 85:**

3 Admit that YOU have not conducted an analysis that isolates META AI MODELS (as opposed
4 to other market factors or THIRD PARTY LLMs) as the cause of any alleged sales decline of the
5 ASSERTED WORKS.

6 **REQUEST FOR ADMISSION NO. 86:**

7 Admit that YOU have not conducted an analysis that isolates META AI MODELS (as opposed
8 to other market factors or THIRD PARTY LLMs) as the cause of any alleged harm to the market for
9 any ASSERTED WORK.

10 **REQUEST FOR ADMISSION NO. 87:**

11 Admit that YOU did not conduct an analysis that isolates Generative AI (as opposed to other
12 market factors) as the cause of any alleged sales decline of the ASSERTED WORKS.

13 **REQUEST FOR ADMISSION NO. 88:**

14 Admit that YOU did not conduct an analysis that isolates Generative AI (as opposed to other
15 market factors) as the cause of any alleged harm to the market for any ASSERTED WORK.

16 **REQUEST FOR ADMISSION NO. 89:**

17 Admit that many of YOUR alleged market-harm theories assert displacement by LLM outputs
18 generally rather than by META AI MODELS' outputs reproducing the ASSERTED WORKS.

19 **REQUEST FOR ADMISSION NO. 90:**

20 Admit that some ASSERTED WORKS are collective issues of Cognella Inc. books and that
21 YOU rely on collective-work registrations to claim rights in constituent contributions.

22 **REQUEST FOR ADMISSION NO. 91:**

23 Admit that YOU do not have a written assignment from every individual contributor of each
24 collective book asserted by YOU in the COMPLAINT.

25 **REQUEST FOR ADMISSION NO. 92:**

26 Admit that YOU have not identified any PERSON who declined to purchase an ASSERTED
27 WORK because of a META AI MODEL output.

REQUEST FOR ADMISSION NO. 93:

Admit that YOU have not identified any PERSON who declined to purchase an ASSERTED WORK because of a META AI MODEL output that reproduced protected expression from that ASSERTED WORK.

REQUEST FOR ADMISSION NO. 94:

Admit that YOU have not identified any PERSON who declined to purchase a subscription to access YOUR content because of a META AI MODEL output.

REQUEST FOR ADMISSION NO. 95:

Admit that YOU have not identified any PERSON who declined to purchase a subscription to access YOUR content because of a META AI MODEL output that reproduced protected expression from that ASSERTED WORK.

REQUEST FOR ADMISSION NO. 96:

Admit that YOU have developed an AI tool that creates content.

REQUEST FOR ADMISSION NO. 97:

Admit that YOU have published content on YOUR website that was created, in whole or in part, using Generative AI.

REQUEST FOR ADMISSION NO. 98:

Admit that YOU are not the author of each of the ASSERTED WORKS listed in Dkt. 1-1 that does not list “Cognella, Inc.” as the “name of the author on copyright registration” (Registration Nos. TX0009158121; TX0009076237; TX0009408063; TX0009523531; TX0009176749; TX0009034761; TX0009188077; TX0009034836; TX0009395889; TX0009549744; TX0009527903; TX0009082196; TX0008255237; TX0009279359; TX0009516292; TX0009418480; TX0008536322; TX0009219291; TX0009213936; TX0009028166; TX0008246203; TX0009070089; TX0009034821; TX0007323967; TX0009081731; TX0007721302; TX0007275900; TXu001361186; TX0007069014; TX0009106112; TX0007947037; TX0009412631; TX0008796209; TX0006325907; TX0009213946; TX0009077767; TX0008484520; TX0008055943; TX0007935903; TX0007903265; TX0007908505; TX0008246590; TX0009207087; TX0007312684; TX0008758122; TX0009031716; TX0008751530; TX0008063082;

1 TX0007323538; TX0007382756; TX0006884455; TX0008108867; TX0008030162; TX0007914615;
2 TX0007323969; TX0007758882; TX0009082185; TX0009128481; TX0007721304; TX0009081958;
3 TX0008533592) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright
4 in such ASSERTED WORK vested.

5 **REQUEST FOR ADMISSION NO. 99:**

6 Admit that YOU cannot identify by name any THIRD PARTY who allegedly received from Meta
7 via TORRENTING a copy of any of YOUR ASSERTED WORKS.

8 **REQUEST FOR ADMISSION NO. 100:**

9 Admit that YOU have no documents showing that a THIRD PARTY received from Meta via
10 TORRENTING a complete READABLE copy of any of YOUR ASSERTED WORKS.

11 **REQUEST FOR ADMISSION NO. 101:**

12 Admit that YOU have no documents showing that a THIRD PARTY received from Meta via
13 TORRENTING a copy of any section or portion of any of YOUR ASSERTED WORKS.

14 **REQUEST FOR ADMISSION NO. 102:**

15 Admit that YOU are unable to identify by name any THIRD PARTY who read a copy of one of
16 YOUR ASSERTED WORKS that the THIRD PARTY received from Meta via TORRENTING.

17 **REQUEST FOR ADMISSION NO. 103:**

18 Admit that YOU have no evidence of how any THIRD PARTY who allegedly received from Meta
19 via TORRENTING a copy of one of YOUR ASSERTED WORKS later used that copy.
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REQUEST FOR ADMISSION NO. 104:

Admit that YOU have no evidence showing that a THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS did not use that copy for purposes of commentary or criticism.

REQUEST FOR ADMISSION NO. 105:

Admit that YOU have no evidence showing that a THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS did not use that copy for a fair use purpose under 17 U.S.C. § 107.

REQUEST FOR ADMISSION NO. 106:

Admit that YOU have not spoken with any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 107:

Admit that YOU have not contacted any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 108:

Admit that YOU have not identified any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 109:

Admit that YOU are unable to identify any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS that engaged in direct copyright infringement of the same ASSERTED WORK.

REQUEST FOR ADMISSION NO. 110:

Admit that YOU cannot identify any direct copyright infringement committed by a THIRD PARTY who allegedly received from Meta via TORRENTING any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 111:

Admit that, for any of YOUR ASSERTED WORKS that were allegedly uploaded by Meta via TORRENTING, YOU have no evidence that YOUR ASSERTED WORKS were READABLE.

REQUEST FOR ADMISSION NO. 112:

Admit that YOU have no documents evidencing that anybody read any of YOUR ASSERTED WORKS as a result of receiving that work from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 113:

Admit that YOU do not know whether any THIRD PARTY read a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 114:

Admit that YOU do not know whether any THIRD PARTY displayed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 115:

Admit that YOU do not know whether any THIRD PARTY redistributed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 116:

Admit that YOU do not know whether any THIRD PARTY performed any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 117:

Admit that YOU do not know whether any THIRD PARTY made fair use of a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 118:

Admit that YOU do not know whether any THIRD PARTY's use of any ASSERTED WORK received from Meta via TORRENTING was not fair use.

REQUEST FOR ADMISSION NO. 119:

Admit that YOU have no documents evidencing whether any THIRD PARTY read a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 120:

Admit that YOU have no documents evidencing whether any THIRD PARTY displayed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 121:

Admit that YOU have no documents evidencing whether any THIRD PARTY redistributed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 122:

Admit that YOU have no documents evidencing whether any THIRD PARTY performed any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 123:

Admit that YOU have no documents evidencing whether any THIRD PARTY made fair use of a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 124:

Admit that YOU have no documents evidencing that any THIRD PARTY's use of any ASSERTED WORK received from Meta via TORRENTING was not fair use.

REQUEST FOR ADMISSION NO. 125:

Admit that YOU cannot identify how many complete copies of YOUR ASSERTED WORKS were allegedly distributed by Meta via TORRENTING to any THIRD PARTY. Complete means all pages of the ASSERTED WORK are present.

REQUEST FOR ADMISSION NO. 126:

Admit that YOU cannot identify any complete copy of YOUR ASSERTED WORKS that was distributed by Meta via TORRENTING to a THIRD PARTY.

REQUEST FOR ADMISSION NO. 127:

Admit that YOU have no documents evidencing that YOU lost any book sales because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 128:

Admit that YOU have no documents evidencing that YOU lost any revenue because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 129:

Admit that YOU are unable to calculate any revenue lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 130:

Admit that YOU are unable to identify a specific subscription that YOU lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 131:

Admit that YOU are unable to identify a specific book sale that YOU lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

1 Dated: July 31, 2026

2 /s/ Meryl Governski

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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 ADMISSION**

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

on the following party(ies) in this action:

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Executed on July 31, 2026, at Washington, D.C.

/s/ Meryl Governski

[counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC. ET AL.,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
ADMISSION**

Trial Date: None

Date Action Filed: December 22, 2025

Judge: The Hon. V. Chhabria

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: JANE ADAMS

SET NUMBER: ONE

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Plaintiff Jane Adams (“Plaintiff”) admit or deny, separately and in writing under oath, each of the matters set forth below (the “Requests”).

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 her 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 WORK/ASSERTED WORKS means YOUR purportedly copyrighted works that YOU have alleged in the ACTION and/or COMPLAINT that Meta has allegedly infringed.

5. PUBLICATION DATE means the first date on which: (a) a copy of an ASSERTED WORK, in any format, was distributed to the public or to YOUR subscribers by sale or other transfer of ownership, or by rental, lease or lending, or (b) YOU offered to distribute copies of an ASSERTED WORK in any format to a group of persons for purposes of further distribution, public performance, or public display.

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

7. GENERATIVE AI TOOL means any artificial intelligence (“AI”) 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, Microsoft CoPilot, 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.

8. LLM means a generative AI large language model.

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

10. WEB CRAWLER means any automated program, script, bot, spider, or software agent that systematically browses, indexes, downloads, or scrapes content from the internet, including without limitation any tool used to harvest, collect, or copy text, data, files, or other content from web pages or online repositories.

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

12. THIRD PARTY means all PERSONS other than YOU and Meta.

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

14. COMMUNICATION(S) is used in its broadest sense and means any transmission of information from one PERSON to another by any means, including without limitation written communications, telephone communications, in person communications, email, texts, Slack, instant messaging, and other electronic communications.

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

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

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

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

15 **INSTRUCTIONS**

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

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

23 3. Meta requests that YOU admit or deny the truth of each statement or fact, application of
 24 law to fact, or opinions about either, set forth in the Requests below.

25 4. To the extent that YOU do not respond with either an unqualified admission or an
 26 objection (the reasons for which must be stated), YOU shall specifically deny the matter and set forth in
 27 detail the reasons why YOU cannot truthfully admit the matter. Any such denial shall fairly meet the
 28

1 substance of the Request, and when good faith requires that YOU qualify an answer or deny only a part
2 of the matter in which any admission is requested, YOU shall specify so much of it as is true and qualify
3 or deny the remainder.

4 5. If, in responding to these Requests, YOU encounter any ambiguities when construing a
5 Request, instruction, or definition, YOU shall set forth in YOUR response the matter deemed ambiguous
6 and the construction used in responding.

7 6. YOU may not give lack of information or knowledge as the reason for failure to admit
8 or deny unless YOU state that YOU have made reasonable inquiry and that the information known or
9 readily obtainable by YOU is insufficient to enable YOU to admit or deny.

10 7. The fact that a Request covers a matter which YOU believe presents a genuine issue for
11 trial may not, on that ground alone, provide the basis for an objection.

12 8. If a Request is silent as to the time period for which information is sought, YOUR
13 response should include all information known to YOU CONCERNING events that occurred, in whole
14 or in part, at any time during the period of 2021 to the present except for the Requests relating to
15 Plaintiff's works, which should go back to the creation of the particular work(s) at issue.

16 9. Any Request set forth below to which there has not been an adequate and timely response
17 may be deemed admitted and, therefore, conclusively established for purposes of this ACTION.

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

22 **REQUESTS FOR ADMISSION**

23 **REQUEST FOR ADMISSION NO. 1:**

24 Admit that YOU are unaware of any lost sales of any ASSERTED WORK due to any conduct
25 of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 2:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that YOU have lost any sales of any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 3:

Admit that YOU are unaware of any specific licensing opportunity that YOU lost for any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 4:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that YOU lost any specific licensing opportunity for any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 5:

Admit that YOU are unaware of any PERSON that has opted not to purchase one of the ASSERTED WORKS due to that PERSON's use of META AI MODELS.

REQUEST FOR ADMISSION NO. 6:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that any PERSON has opted not to purchase one of the ASSERTED WORKS due to that PERSON's use of META AI MODELS.

REQUEST FOR ADMISSION NO. 7:

Admit that, for each ASSERTED WORK, more than fifty percent (50%) of all gross revenue was generated within the three (3) years immediately following its PUBLICATION DATE.

REQUEST FOR ADMISSION NO. 8:

Admit that no THIRD PARTY has offered YOU compensation to use any of the ASSERTED WORKS to train a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 9:

Admit that YOU are unaware of any COMMUNICATIONS preceding the initiation of the ACTION in which a THIRD PARTY offered or engaged in discussions concerning the potential to offer YOU compensation to use any of the ASSERTED WORKS to train a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 10:

Admit that YOU have never licensed any of the ASSERTED WORKS for actual or potential use in connection with development of a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 11:

Admit that YOU are unaware of any of the ASSERTED WORKS ever having been licensed for actual or potential use in connection with the development of a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 12:

Admit that YOU have not granted another PERSON the right to license the ASSERTED WORKS as training data for a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 13:

Admit that YOU are unaware of any instance in which a PERSON communicated to YOU that they chose not to purchase one or more of the ASSERTED WORKS due to that PERSON's decision to instead use META AI MODELS.

REQUEST FOR ADMISSION NO. 14:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING a PERSON communicating to YOU that they chose not to purchase one or more of the ASSERTED WORKS due to that PERSON's decision to instead use META AI MODELS.

REQUEST FOR ADMISSION NO. 15:

Admit that YOU have no DOCUMENTS EVIDENCING that any PERSON has offered any compensation to YOU for the use of any of the ASSERTED WORKS to train LLMs.

REQUEST FOR ADMISSION NO. 16:

Admit that YOU have no DOCUMENTS EVIDENCING that any PERSON has actually compensated YOU for use of any of the ASSERTED WORKS to train LLMs.

REQUEST FOR ADMISSION NO. 17:

Admit that YOU have no DOCUMENTS EVIDENCING that sales for the ASSERTED WORKS (including through any physical bookstore, online bookseller, or any other type of book wholesaler or retailer) decreased due to the alleged use of the ASSERTED WORKS to train GENERATIVE AI

1 TOOLS.

2 **REQUEST FOR ADMISSION NO. 18:**

3 Admit that YOU have no DOCUMENTS EVIDENCING that sales for the ASSERTED WORKS
4 (including through any physical bookstore, online bookseller, or any other type of book wholesaler or
5 retailer) decreased due to the alleged use of the ASSERTED WORKS to train META AI MODELS.

6 **REQUEST FOR ADMISSION NO. 19:**

7 Admit that YOU have not quantified how much of YOUR sales YOU allegedly lost due to the
8 use of the ASSERTED WORKS to develop or train any of the META AI MODELS.

9 **REQUEST FOR ADMISSION NO. 20:**

10 Admit that YOU have not quantified how much of YOUR sales YOU allegedly lost due to the
11 use of the ASSERTED WORKS to develop or train LLMs offered by THIRD PARTIES other than
12 Meta.

13 **REQUEST FOR ADMISSION NO. 21:**

14 Admit that, other than YOUR contention that LLM developers such as Meta should have
15 compensated YOU to allegedly use the ASSERTED WORKS to train LLMs, YOU are unaware of any
16 DOCUMENTS EVIDENCING any monetary injury that YOU have suffered due to any conduct of Meta
17 alleged in the COMPLAINT.

18 **REQUEST FOR ADMISSION NO. 22:**

19 Admit that YOU have used a GENERATIVE AI TOOL.

20 **REQUEST FOR ADMISSION NO. 23:**

21 Admit that YOU have used an LLM.

22 **REQUEST FOR ADMISSION NO. 24:**

23 Admit that YOU have used a META AI MODEL.

24 **REQUEST FOR ADMISSION NO. 25:**

25 Admit that each of the ASSERTED WORKS has been made available to the public.

26 **REQUEST FOR ADMISSION NO. 26:**

27 Admit that all of the ASSERTED WORKS are published.

REQUEST FOR ADMISSION NO. 27:

Admit that none of YOUR claims in the COMPLAINT are based on any of YOUR unpublished works.

REQUEST FOR ADMISSION NO. 28:

Admit that each of the ASSERTED WORKS had been made available to the public prior to the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 29:

Admit that the PUBLICATION DATE of each of the ASSERTED WORKS occurred before the commencement of the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 30:

Admit that the ASSERTED WORKS were all published prior to the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 31:

Admit that all of the ASSERTED WORKS are available to be read online either for free or for a fee.

REQUEST FOR ADMISSION NO. 32:

Admit that YOU do not contend that reviews of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 33:

Admit that YOU do not contend that reviews of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS unless they are substantially similar in protected expression.

REQUEST FOR ADMISSION NO. 34:

Admit that YOU do not contend that summaries of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 35:

Admit that YOU do not contend that summaries of the ASSERTED WORKS, whether prepared

1 by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS unless they are
2 substantially similar in protected expression.

3 **REQUEST FOR ADMISSION NO. 36:**

4 Admit that YOU are not aware of any DOCUMENTS EVIDENCING that any PERSON has
5 refused to license any of the ASSERTED WORKS due to any conduct of Meta.

6 **REQUEST FOR ADMISSION NO. 37:**

7 Admit that Meta did not create the Books3 dataset.

8 **REQUEST FOR ADMISSION NO. 38:**

9 Admit that YOU do not contend that Meta created the Books3 dataset.

10 **REQUEST FOR ADMISSION NO. 39:**

11 Admit that Meta did not create the LibGen (Library Genesis) dataset.

12 **REQUEST FOR ADMISSION NO. 40:**

13 Admit that YOU do not contend that Meta created the LibGen (Library Genesis) dataset.

14 **REQUEST FOR ADMISSION NO. 41:**

15 Admit that Meta did not create The Pile dataset.

16 **REQUEST FOR ADMISSION NO. 42:**

17 Admit that YOU do not contend that Meta created The Pile dataset.

18 **REQUEST FOR ADMISSION NO. 43:**

19 Admit that Meta did not create the Z-Library dataset.

20 **REQUEST FOR ADMISSION NO. 44:**

21 Admit that YOU do not contend that Meta created the Z-Library dataset.

22 **REQUEST FOR ADMISSION NO. 45:**

23 Admit that Meta did not create the Bibliotik dataset.

24 **REQUEST FOR ADMISSION NO. 46:**

25 Admit that YOU do not contend that Meta created the Bibliotik dataset.

26 **REQUEST FOR ADMISSION NO. 47:**

27 Admit that LLM developers other than Meta have used the Books3 dataset to train an LLM.
28

REQUEST FOR ADMISSION NO. 48:

Admit that LLM developers other than Meta have used the LibGen (Library Genesis) dataset to train an LLM.

REQUEST FOR ADMISSION NO. 49:

Admit that LLM developers other than Meta have used The Pile dataset to train an LLM.

REQUEST FOR ADMISSION NO. 50:

Admit that LLM developers other than Meta have used the Z-Library dataset to train an LLM.

REQUEST FOR ADMISSION NO. 51:

Admit that LLM developers other than Meta have used the Bibliotik dataset to train an LLM.

REQUEST FOR ADMISSION NO. 52:

Admit that YOU are aware that the ASSERTED WORKS have been a part of a dataset that has been used to train LLMs beyond META AI MODELS.

REQUEST FOR ADMISSION NO. 53:

Admit that YOU have been aware that the ASSERTED WORKS have been a part of a dataset that was used to train LLMs since before November 6, 2022.

REQUEST FOR ADMISSION NO. 54:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Books3 dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 55:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the LibGen (Library Genesis) dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 56:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed The Pile dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 57:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Z-Library dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 58:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Bibliotik dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 59:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Books3 dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 60:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the LibGen (Library Genesis) dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 61:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed The Pile dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 62:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Z-Library dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 63:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Bibliotik dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 64:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that a THIRD PARTY received an entire copy of any of the ASSERTED WORKS from Meta.

REQUEST FOR ADMISSION NO. 65:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that a THIRD PARTY received a copy of any of the ASSERTED WORKS from Meta that was capable of being read or viewed as legible text.

REQUEST FOR ADMISSION NO. 66:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that any THIRD PARTY

1 received from Meta any files or data that are substantially similar in protected expression to any
2 ASSERTED WORK.

3 **REQUEST FOR ADMISSION NO. 67:**

4 Admit that YOU cannot identify a single PERSON who received a legible copy of one of the
5 ASSERTED WORKS from Meta.

6 **REQUEST FOR ADMISSION NO. 68:**

7 Admit that YOU cannot identify a single PERSON who received an entire copy of any of the
8 ASSERTED WORKS from Meta.

9 **REQUEST FOR ADMISSION NO. 69:**

10 Admit that a THIRD PARTY does not need to purchase a copy of those ASSERTED WORKS
11 that are available to read on YOUR website through a subscription.

12 **REQUEST FOR ADMISSION NO. 70:**

13 Admit that YOU are not aware of any agreements to assign rights in or to the ASSERTED
14 WORKS that have not already been produced in this ACTION.

15 **REQUEST FOR ADMISSION NO. 71:**

16 Admit that YOU are aware that at least one of YOUR employees used META AI MODELS
17 prior to the filing of the COMPLAINT.

18 **REQUEST FOR ADMISSION NO. 72:**

19 Admit that YOU publish works on YOUR website that were edited or created using a
20 GENERATIVE AI TOOL.

21 **REQUEST FOR ADMISSION NO. 73:**

22 Admit that YOU have used GENERATIVE AI TOOLS other than META AI MODELS in
23 connection with at least one work published by YOU.

24 **REQUEST FOR ADMISSION NO. 74:**

25 Admit that YOU have used a WEB CRAWLER to download publicly available data from the
26 internet for the purpose of developing a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 75:

Admit that YOU have in YOUR possession, custody, or control data obtained from a WEB CRAWLER that includes unlicensed THIRD PARTY copyrighted works.

REQUEST FOR ADMISSION NO. 76:

Admit that YOU have downloaded at least one dataset that contains at least one THIRD PARTY copyrighted work without the authorization of that THIRD PARTY.

REQUEST FOR ADMISSION NO. 77:

Admit that YOU rely on the REGISTRATION MATERIALS identified in Dkt. 63-1 to establish ownership of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 78:

Admit that certain of the ASSERTED WORKS are later editions that claim copyright only in new and revised text and exclude material covered by prior registrations.

REQUEST FOR ADMISSION NO. 79:

Admit that all of the ASSERTED WORKS are works of nonfiction.

REQUEST FOR ADMISSION NO. 80:

Admit that the general subject matter of each ASSERTED WORK is discussed in public sources available for free online.

REQUEST FOR ADMISSION NO. 81:

Admit that prior to filing the ACTION YOU did not identify specific META AI MODEL outputs that reproduce verbatim protected expression from any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 82:

Admit that YOU do not possess logs or other direct technical evidence that any META AI MODEL was trained on specific files containing any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 83:

Admit that YOU do not have any DOCUMENTS EVIDENCING that Meta “seeded” any ASSERTED WORK via BitTorrent.

REQUEST FOR ADMISSION NO. 84:

Admit that YOU have not conducted an analysis that isolates META AI MODELS (as opposed to other market factors or THIRD PARTY LLMs) as the cause of any alleged sales decline of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 85:

Admit that YOU have not conducted an analysis that isolates META AI MODELS (as opposed to other market factors or THIRD PARTY LLMs) as the cause of any alleged harm to the market for any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 86:

Admit that YOU did not conduct an analysis that isolates Generative AI (as opposed to other market factors) as the cause of any alleged sales decline of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 87:

Admit that YOU did not conduct an analysis that isolates Generative AI (as opposed to other market factors) as the cause of any alleged harm to the market for any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 88:

Admit that many of YOUR alleged market-harm theories assert displacement by LLM outputs generally rather than by META AI MODELS' outputs reproducing the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 89:

Admit that some ASSERTED WORKS are collective issues of Chicken Soup for the Soul books and that YOU rely on collective-work registrations to claim rights in constituent contributions.

REQUEST FOR ADMISSION NO. 90:

Admit that YOU do not have a written assignment from every individual contributor of each collective book asserted by YOU in the COMPLAINT.

REQUEST FOR ADMISSION NO. 91:

Admit that YOU have not identified any PERSON who declined to purchase an ASSERTED WORK because of a META AI MODEL output.

REQUEST FOR ADMISSION NO. 92:

Admit that YOU have not identified any PERSON who declined to purchase an ASSERTED WORK because of a META AI MODEL output that reproduced protected expression from that ASSERTED WORK.

REQUEST FOR ADMISSION NO. 93:

Admit that YOU have not identified any PERSON who declined to purchase a subscription to access YOUR content because of a META AI MODEL output.

REQUEST FOR ADMISSION NO. 94:

Admit that YOU have not identified any PERSON who declined to purchase a subscription to access YOUR content because of a META AI MODEL output that reproduced protected expression from that ASSERTED WORK.

REQUEST FOR ADMISSION NO. 95:

Admit that YOU have developed an AI tool that creates content.

REQUEST FOR ADMISSION NO. 96:

Admit that YOU have published content on YOUR website that was created, in whole or in part, using Generative AI.

REQUEST FOR ADMISSION NO. 97:

Admit that YOU are not the author of the ASSERTED WORK entitled “Bad Blood: Secrets and Lies in a Silicon Valley Startup” (Registration No. TX0008666026) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 98:

Admit that YOU cannot identify by name any THIRD PARTY who allegedly received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 99:

Admit that YOU have no documents showing that a THIRD PARTY received from Meta via TORRENTING a complete READABLE copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 100:

Admit that YOU have no documents showing that a THIRD PARTY received from Meta via TORRENTING a copy of any section or portion of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 101:

Admit that YOU are unable to identify by name any THIRD PARTY who read a copy of one of YOUR ASSERTED WORKS that the THIRD PARTY received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 102:

Admit that YOU have no evidence of how any THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS later used that copy.

REQUEST FOR ADMISSION NO. 103:

Admit that YOU have no evidence showing that a THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS did not use that copy for purposes of commentary or criticism.

REQUEST FOR ADMISSION NO. 104:

Admit that YOU have no evidence showing that a THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS did not use that copy for a fair use purpose under 17 U.S.C. § 107.

REQUEST FOR ADMISSION NO. 105:

Admit that YOU have not spoken with any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 106:

Admit that YOU have not contacted any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 107:

Admit that YOU have not identified any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 108:

Admit that YOU are unable to identify any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS that engaged in direct copyright infringement of the same ASSERTED WORK.

REQUEST FOR ADMISSION NO. 109:

Admit that YOU cannot identify any direct copyright infringement committed by a THIRD PARTY who allegedly received from Meta via TORRENTING any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 110:

Admit that, for any of YOUR ASSERTED WORKS that were allegedly uploaded by Meta via TORRENTING, YOU have no evidence that YOUR ASSERTED WORKS were READABLE.

REQUEST FOR ADMISSION NO. 111:

Admit that YOU have no documents evidencing that anybody read any of YOUR ASSERTED WORKS as a result of receiving that work from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 112:

Admit that YOU do not know whether any THIRD PARTY read a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 113:

Admit that YOU do not know whether any THIRD PARTY displayed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 114:

Admit that YOU do not know whether any THIRD PARTY redistributed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 115:

Admit that YOU do not know whether any THIRD PARTY performed any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 116:

Admit that YOU do not know whether any THIRD PARTY made fair use of a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 117:

Admit that YOU do not know whether any THIRD PARTY's use of any ASSERTED WORK received from Meta via TORRENTING was not fair use.

REQUEST FOR ADMISSION NO. 118:

Admit that YOU have no documents evidencing whether any THIRD PARTY read a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 119:

Admit that YOU have no documents evidencing whether any THIRD PARTY displayed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 120:

Admit that YOU have no documents evidencing whether any THIRD PARTY redistributed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 121:

Admit that YOU have no documents evidencing whether any THIRD PARTY performed any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 122:

Admit that YOU have no documents evidencing whether any THIRD PARTY made fair use of a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 123:

Admit that YOU have no documents evidencing that any THIRD PARTY's use of any ASSERTED WORK received from Meta via TORRENTING was not fair use.

REQUEST FOR ADMISSION NO. 124:

Admit that YOU cannot identify how many complete copies of YOUR ASSERTED WORKS were allegedly distributed by Meta via TORRENTING to any THIRD PARTY. Complete means all pages of the ASSERTED WORK are present.

REQUEST FOR ADMISSION NO. 125:

Admit that YOU cannot identify any complete copy of YOUR ASSERTED WORKS that was distributed by Meta via TORRENTING to a THIRD PARTY.

REQUEST FOR ADMISSION NO. 126:

Admit that YOU have no documents evidencing that YOU lost any book sales because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 127:

Admit that YOU have no documents evidencing that YOU lost any revenue because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 128:

Admit that YOU are unable to calculate any revenue lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 129:

Admit that YOU are unable to identify a specific subscription that YOU lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 130:

Admit that YOU are unable to identify a specific book sale that YOU lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

1 Dated: July 31, 2026

2 /s/ Meryl Governski
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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 ADMISSION**

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

on the following party(ies) in this action:

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Executed on July 31, 2026, at Washington, D.C.

/s/ Meryl Governski

[counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC. ET AL.,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
ADMISSION**

Trial Date: None

Date Action Filed: December 22, 2025

Judge: The Hon. V. Chhabria

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: LISA BARRETTA

SET NUMBER: ONE

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Plaintiff Lisa Barretta (“Plaintiff”) admit or deny, separately and in writing under oath, each of the matters set forth below (the “Requests”).

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 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 WORK/ASSERTED WORKS means YOUR purportedly copyrighted works that YOU have alleged in the ACTION and/or COMPLAINT that Meta has allegedly infringed.

5. PUBLICATION DATE means the first date on which: (a) a copy of an ASSERTED WORK, in any format, was distributed to the public or to YOUR subscribers by sale or other transfer of ownership, or by rental, lease or lending, or (b) YOU offered to distribute copies of an ASSERTED WORK in any format to a group of persons for purposes of further distribution, public performance, or public display.

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

7. GENERATIVE AI TOOL means any artificial intelligence (“AI”) 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, Microsoft CoPilot, 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.

8. LLM means a generative AI large language model.

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

10. WEB CRAWLER means any automated program, script, bot, spider, or software agent that systematically browses, indexes, downloads, or scrapes content from the internet, including without limitation any tool used to harvest, collect, or copy text, data, files, or other content from web pages or online repositories.

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

12. THIRD PARTY means all PERSONS other than YOU and Meta.

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

14. COMMUNICATION(S) is used in its broadest sense and means any transmission of information from one PERSON to another by any means, including without limitation written communications, telephone communications, in person communications, email, texts, Slack, instant messaging, and other electronic communications.

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

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

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

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

15 **INSTRUCTIONS**

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

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

23 3. Meta requests that YOU admit or deny the truth of each statement or fact, application of
 24 law to fact, or opinions about either, set forth in the Requests below.

25 4. To the extent that YOU do not respond with either an unqualified admission or an
 26 objection (the reasons for which must be stated), YOU shall specifically deny the matter and set forth in
 27 detail the reasons why YOU cannot truthfully admit the matter. Any such denial shall fairly meet the
 28

1 substance of the Request, and when good faith requires that YOU qualify an answer or deny only a part
2 of the matter in which any admission is requested, YOU shall specify so much of it as is true and qualify
3 or deny the remainder.

4 5. If, in responding to these Requests, YOU encounter any ambiguities when construing a
5 Request, instruction, or definition, YOU shall set forth in YOUR response the matter deemed ambiguous
6 and the construction used in responding.

7 6. YOU may not give lack of information or knowledge as the reason for failure to admit
8 or deny unless YOU state that YOU have made reasonable inquiry and that the information known or
9 readily obtainable by YOU is insufficient to enable YOU to admit or deny.

10 7. The fact that a Request covers a matter which YOU believe presents a genuine issue for
11 trial may not, on that ground alone, provide the basis for an objection.

12 8. If a Request is silent as to the time period for which information is sought, YOUR
13 response should include all information known to YOU CONCERNING events that occurred, in whole
14 or in part, at any time during the period of 2021 to the present except for the Requests relating to
15 Plaintiff's works, which should go back to the creation of the particular work(s) at issue.

16 9. Any Request set forth below to which there has not been an adequate and timely response
17 may be deemed admitted and, therefore, conclusively established for purposes of this ACTION.

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

22 **REQUESTS FOR ADMISSION**

23 **REQUEST FOR ADMISSION NO. 1:**

24 Admit that YOU are unaware of any lost sales of any ASSERTED WORK due to any conduct
25 of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 2:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that YOU have lost any sales of any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 3:

Admit that YOU are unaware of any specific licensing opportunity that YOU lost for any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 4:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that YOU lost any specific licensing opportunity for any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 5:

Admit that YOU are unaware of any PERSON that has opted not to purchase one of the ASSERTED WORKS due to that PERSON's use of META AI MODELS.

REQUEST FOR ADMISSION NO. 6:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that any PERSON has opted not to purchase one of the ASSERTED WORKS due to that PERSON's use of META AI MODELS.

REQUEST FOR ADMISSION NO. 7:

Admit that, for each ASSERTED WORK, more than fifty percent (50%) of all gross revenue was generated within the three (3) years immediately following its PUBLICATION DATE.

REQUEST FOR ADMISSION NO. 8:

Admit that no THIRD PARTY has offered YOU compensation to use any of the ASSERTED WORKS to train a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 9:

Admit that YOU are unaware of any COMMUNICATIONS preceding the initiation of the ACTION in which a THIRD PARTY offered or engaged in discussions concerning the potential to offer YOU compensation to use any of the ASSERTED WORKS to train a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 10:

Admit that YOU have never licensed any of the ASSERTED WORKS for actual or potential use in connection with development of a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 11:

Admit that YOU are unaware of any of the ASSERTED WORKS ever having been licensed for actual or potential use in connection with the development of a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 12:

Admit that YOU have not granted another PERSON the right to license the ASSERTED WORKS as training data for a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 13:

Admit that YOU are unaware of any instance in which a PERSON communicated to YOU that they chose not to purchase one or more of the ASSERTED WORKS due to that PERSON's decision to instead use META AI MODELS.

REQUEST FOR ADMISSION NO. 14:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING a PERSON communicating to YOU that they chose not to purchase one or more of the ASSERTED WORKS due to that PERSON's decision to instead use META AI MODELS.

REQUEST FOR ADMISSION NO. 15:

Admit that YOU have no DOCUMENTS EVIDENCING that any PERSON has offered any compensation to YOU for the use of any of the ASSERTED WORKS to train LLMs.

REQUEST FOR ADMISSION NO. 16:

Admit that YOU have no DOCUMENTS EVIDENCING that any PERSON has actually compensated YOU for use of any of the ASSERTED WORKS to train LLMs.

REQUEST FOR ADMISSION NO. 17:

Admit that YOU have no DOCUMENTS EVIDENCING that sales for the ASSERTED WORKS (including through any physical bookstore, online bookseller, or any other type of book wholesaler or retailer) decreased due to the alleged use of the ASSERTED WORKS to train GENERATIVE AI

1 TOOLS.

2 **REQUEST FOR ADMISSION NO. 18:**

3 Admit that YOU have no DOCUMENTS EVIDENCING that sales for the ASSERTED WORKS
4 (including through any physical bookstore, online bookseller, or any other type of book wholesaler or
5 retailer) decreased due to the alleged use of the ASSERTED WORKS to train META AI MODELS.

6 **REQUEST FOR ADMISSION NO. 19:**

7 Admit that YOU have not quantified how much of YOUR sales YOU allegedly lost due to the
8 use of the ASSERTED WORKS to develop or train any of the META AI MODELS.

9 **REQUEST FOR ADMISSION NO. 20:**

10 Admit that YOU have not quantified how much of YOUR sales YOU allegedly lost due to the
11 use of the ASSERTED WORKS to develop or train LLMs offered by THIRD PARTIES other than
12 Meta.

13 **REQUEST FOR ADMISSION NO. 21:**

14 Admit that, other than YOUR contention that LLM developers such as Meta should have
15 compensated YOU to allegedly use the ASSERTED WORKS to train LLMs, YOU are unaware of any
16 DOCUMENTS EVIDENCING any monetary injury that YOU have suffered due to any conduct of Meta
17 alleged in the COMPLAINT.

18 **REQUEST FOR ADMISSION NO. 22:**

19 Admit that YOU have used a GENERATIVE AI TOOL.

20 **REQUEST FOR ADMISSION NO. 23:**

21 Admit that YOU have used an LLM.

22 **REQUEST FOR ADMISSION NO. 24:**

23 Admit that YOU have used a META AI MODEL.

24 **REQUEST FOR ADMISSION NO. 25:**

25 Admit that each of the ASSERTED WORKS has been made available to the public.

26 **REQUEST FOR ADMISSION NO. 26:**

27 Admit that all of the ASSERTED WORKS are published.

REQUEST FOR ADMISSION NO. 27:

Admit that none of YOUR claims in the COMPLAINT are based on any of YOUR unpublished works.

REQUEST FOR ADMISSION NO. 28:

Admit that each of the ASSERTED WORKS had been made available to the public prior to the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 29:

Admit that the PUBLICATION DATE of each of the ASSERTED WORKS occurred before the commencement of the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 30:

Admit that the ASSERTED WORKS were all published prior to the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 31:

Admit that all of the ASSERTED WORKS are available to be read online either for free or for a fee.

REQUEST FOR ADMISSION NO. 32:

Admit that YOU do not contend that reviews of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 33:

Admit that YOU do not contend that reviews of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS unless they are substantially similar in protected expression.

REQUEST FOR ADMISSION NO. 34:

Admit that YOU do not contend that summaries of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 35:

Admit that YOU do not contend that summaries of the ASSERTED WORKS, whether prepared

1 by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS unless they are
2 substantially similar in protected expression.

3 **REQUEST FOR ADMISSION NO. 36:**

4 Admit that YOU are not aware of any DOCUMENTS EVIDENCING that any PERSON has
5 refused to license any of the ASSERTED WORKS due to any conduct of Meta.

6 **REQUEST FOR ADMISSION NO. 37:**

7 Admit that Meta did not create the Books3 dataset.

8 **REQUEST FOR ADMISSION NO. 38:**

9 Admit that YOU do not contend that Meta created the Books3 dataset.

10 **REQUEST FOR ADMISSION NO. 39:**

11 Admit that Meta did not create the LibGen (Library Genesis) dataset.

12 **REQUEST FOR ADMISSION NO. 40:**

13 Admit that YOU do not contend that Meta created the LibGen (Library Genesis) dataset.

14 **REQUEST FOR ADMISSION NO. 41:**

15 Admit that Meta did not create The Pile dataset.

16 **REQUEST FOR ADMISSION NO. 42:**

17 Admit that YOU do not contend that Meta created The Pile dataset.

18 **REQUEST FOR ADMISSION NO. 43:**

19 Admit that Meta did not create the Z-Library dataset.

20 **REQUEST FOR ADMISSION NO. 44:**

21 Admit that YOU do not contend that Meta created the Z-Library dataset.

22 **REQUEST FOR ADMISSION NO. 45:**

23 Admit that Meta did not create the Bibliotik dataset.

24 **REQUEST FOR ADMISSION NO. 46:**

25 Admit that YOU do not contend that Meta created the Bibliotik dataset.

26 **REQUEST FOR ADMISSION NO. 47:**

27 Admit that LLM developers other than Meta have used the Books3 dataset to train an LLM.
28

REQUEST FOR ADMISSION NO. 48:

Admit that LLM developers other than Meta have used the LibGen (Library Genesis) dataset to train an LLM.

REQUEST FOR ADMISSION NO. 49:

Admit that LLM developers other than Meta have used The Pile dataset to train an LLM.

REQUEST FOR ADMISSION NO. 50:

Admit that LLM developers other than Meta have used the Z-Library dataset to train an LLM.

REQUEST FOR ADMISSION NO. 51:

Admit that LLM developers other than Meta have used the Bibliotik dataset to train an LLM.

REQUEST FOR ADMISSION NO. 52:

Admit that YOU are aware that the ASSERTED WORKS have been a part of a dataset that has been used to train LLMs beyond META AI MODELS.

REQUEST FOR ADMISSION NO. 53:

Admit that YOU have been aware that the ASSERTED WORKS have been a part of a dataset that was used to train LLMs since before November 6, 2022.

REQUEST FOR ADMISSION NO. 54:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Books3 dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 55:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the LibGen (Library Genesis) dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 56:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed The Pile dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 57:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Z-Library dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 58:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Bibliotik dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 59:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Books3 dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 60:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the LibGen (Library Genesis) dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 61:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed The Pile dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 62:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Z-Library dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 63:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Bibliotik dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 64:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that a THIRD PARTY received an entire copy of any of the ASSERTED WORKS from Meta.

REQUEST FOR ADMISSION NO. 65:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that a THIRD PARTY received a copy of any of the ASSERTED WORKS from Meta that was capable of being read or viewed as legible text.

REQUEST FOR ADMISSION NO. 66:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that any THIRD PARTY

received from Meta any files or data that are substantially similar in protected expression to any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 67:

Admit that YOU cannot identify a single PERSON who received a legible copy of one of the ASSERTED WORKS from Meta.

REQUEST FOR ADMISSION NO. 68:

Admit that YOU cannot identify a single PERSON who received an entire copy of any of the ASSERTED WORKS from Meta.

REQUEST FOR ADMISSION NO. 69:

Admit that a THIRD PARTY does not need to purchase a copy of those ASSERTED WORKS that are available to read on YOUR website through a subscription.

REQUEST FOR ADMISSION NO. 70:

Admit that YOU are not aware of any agreements to assign rights in or to the ASSERTED WORKS that have not already been produced in this ACTION.

REQUEST FOR ADMISSION NO. 71:

Admit that YOU are aware that at least one of YOUR employees used META AI MODELS prior to the filing of the COMPLAINT.

REQUEST FOR ADMISSION NO. 72:

Admit that YOU publish works on YOUR website that were edited or created using a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 73:

Admit that YOU have used GENERATIVE AI TOOLS other than META AI MODELS in connection with at least one work published by YOU.

REQUEST FOR ADMISSION NO. 74:

Admit that YOU have used a WEB CRAWLER to download publicly available data from the internet for the purpose of developing a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 75:

Admit that YOU have in YOUR possession, custody, or control data obtained from a WEB CRAWLER that includes unlicensed THIRD PARTY copyrighted works.

REQUEST FOR ADMISSION NO. 76:

Admit that YOU have downloaded at least one dataset that contains at least one THIRD PARTY copyrighted work without the authorization of that THIRD PARTY.

REQUEST FOR ADMISSION NO. 77:

Admit that YOU rely on the REGISTRATION MATERIALS identified in Dkt. 63-1 to establish ownership of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 78:

Admit that certain of the ASSERTED WORKS are later editions that claim copyright only in new and revised text and exclude material covered by prior registrations.

REQUEST FOR ADMISSION NO. 79:

Admit that all of the ASSERTED WORKS are works of nonfiction.

REQUEST FOR ADMISSION NO. 80:

Admit that the general subject matter of each ASSERTED WORK is discussed in public sources available for free online.

REQUEST FOR ADMISSION NO. 81:

Admit that prior to filing the ACTION YOU did not identify specific META AI MODEL outputs that reproduce verbatim protected expression from any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 82:

Admit that YOU do not possess logs or other direct technical evidence that any META AI MODEL was trained on specific files containing any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 83:

Admit that YOU do not have any DOCUMENTS EVIDENCING that Meta “seeded” any ASSERTED WORK via BitTorrent.

REQUEST FOR ADMISSION NO. 84:

Admit that YOU have not conducted an analysis that isolates META AI MODELS (as opposed to other market factors or THIRD PARTY LLMs) as the cause of any alleged sales decline of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 85:

Admit that YOU have not conducted an analysis that isolates META AI MODELS (as opposed to other market factors or THIRD PARTY LLMs) as the cause of any alleged harm to the market for any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 86:

Admit that YOU did not conduct an analysis that isolates Generative AI (as opposed to other market factors) as the cause of any alleged sales decline of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 87:

Admit that YOU did not conduct an analysis that isolates Generative AI (as opposed to other market factors) as the cause of any alleged harm to the market for any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 88:

Admit that many of YOUR alleged market-harm theories assert displacement by LLM outputs generally rather than by META AI MODELS' outputs reproducing the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 89:

Admit that some ASSERTED WORKS are collective issues of Chicken Soup for the Soul books and that YOU rely on collective-work registrations to claim rights in constituent contributions.

REQUEST FOR ADMISSION NO. 90:

Admit that YOU do not have a written assignment from every individual contributor of each collective book asserted by YOU in the COMPLAINT.

REQUEST FOR ADMISSION NO. 91:

Admit that YOU have not identified any PERSON who declined to purchase an ASSERTED WORK because of a META AI MODEL output.

REQUEST FOR ADMISSION NO. 92:

Admit that YOU have not identified any PERSON who declined to purchase an ASSERTED WORK because of a META AI MODEL output that reproduced protected expression from that ASSERTED WORK.

REQUEST FOR ADMISSION NO. 93:

Admit that YOU have not identified any PERSON who declined to purchase a subscription to access YOUR content because of a META AI MODEL output.

REQUEST FOR ADMISSION NO. 94:

Admit that YOU have not identified any PERSON who declined to purchase a subscription to access YOUR content because of a META AI MODEL output that reproduced protected expression from that ASSERTED WORK.

REQUEST FOR ADMISSION NO. 95:

Admit that YOU have developed an AI tool that creates content.

REQUEST FOR ADMISSION NO. 96:

Admit that YOU have published content on YOUR website that was created, in whole or in part, using Generative AI.

REQUEST FOR ADMISSION NO. 97:

Admit that YOU are not the author of the ASSERTED WORK entitled “Bad Blood: Secrets and Lies in a Silicon Valley Startup” (Registration No. TX0008666026) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 98:

Admit that YOU cannot identify by name any THIRD PARTY who allegedly received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 99:

Admit that YOU have no documents showing that a THIRD PARTY received from Meta via TORRENTING a complete READABLE copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 100:

Admit that YOU have no documents showing that a THIRD PARTY received from Meta via TORRENTING a copy of any section or portion of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 101:

Admit that YOU are unable to identify by name any THIRD PARTY who read a copy of one of YOUR ASSERTED WORKS that the THIRD PARTY received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 102:

Admit that YOU have no evidence of how any THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS later used that copy.

REQUEST FOR ADMISSION NO. 103:

Admit that YOU have no evidence showing that a THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS did not use that copy for purposes of commentary or criticism.

REQUEST FOR ADMISSION NO. 104:

Admit that YOU have no evidence showing that a THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS did not use that copy for a fair use purpose under 17 U.S.C. § 107.

REQUEST FOR ADMISSION NO. 105:

Admit that YOU have not spoken with any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 106:

Admit that YOU have not contacted any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 107:

Admit that YOU have not identified any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 108:

Admit that YOU are unable to identify any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS that engaged in direct copyright infringement of the same ASSERTED WORK.

REQUEST FOR ADMISSION NO. 109:

Admit that YOU cannot identify any direct copyright infringement committed by a THIRD PARTY who allegedly received from Meta via TORRENTING any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 110:

Admit that, for any of YOUR ASSERTED WORKS that were allegedly uploaded by Meta via TORRENTING, YOU have no evidence that YOUR ASSERTED WORKS were READABLE.

REQUEST FOR ADMISSION NO. 111:

Admit that YOU have no documents evidencing that anybody read any of YOUR ASSERTED WORKS as a result of receiving that work from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 112:

Admit that YOU do not know whether any THIRD PARTY read a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 113:

Admit that YOU do not know whether any THIRD PARTY displayed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 114:

Admit that YOU do not know whether any THIRD PARTY redistributed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 115:

Admit that YOU do not know whether any THIRD PARTY performed any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 116:

Admit that YOU do not know whether any THIRD PARTY made fair use of a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 117:

Admit that YOU do not know whether any THIRD PARTY's use of any ASSERTED WORK received from Meta via TORRENTING was not fair use.

REQUEST FOR ADMISSION NO. 118:

Admit that YOU have no documents evidencing whether any THIRD PARTY read a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 119:

Admit that YOU have no documents evidencing whether any THIRD PARTY displayed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 120:

Admit that YOU have no documents evidencing whether any THIRD PARTY redistributed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 121:

Admit that YOU have no documents evidencing whether any THIRD PARTY performed any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 122:

Admit that YOU have no documents evidencing whether any THIRD PARTY made fair use of a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 123:

Admit that YOU have no documents evidencing that any THIRD PARTY's use of any ASSERTED WORK received from Meta via TORRENTING was not fair use.

REQUEST FOR ADMISSION NO. 124:

Admit that YOU cannot identify how many complete copies of YOUR ASSERTED WORKS were allegedly distributed by Meta via TORRENTING to any THIRD PARTY. Complete means all pages of the ASSERTED WORK are present.

REQUEST FOR ADMISSION NO. 125:

Admit that YOU cannot identify any complete copy of YOUR ASSERTED WORKS that was distributed by Meta via TORRENTING to a THIRD PARTY.

REQUEST FOR ADMISSION NO. 126:

Admit that YOU have no documents evidencing that YOU lost any book sales because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 127:

Admit that YOU have no documents evidencing that YOU lost any revenue because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 128:

Admit that YOU are unable to calculate any revenue lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 129:

Admit that YOU are unable to identify a specific subscription that YOU lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 130:

Admit that YOU are unable to identify a specific book sale that YOU lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

1 Dated: July 31, 2026

2 /s/ Meryl Governski
3 DUNN ISAACSON RHEE LLP
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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 ADMISSION**

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

on the following party(ies) in this action:

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Executed on July 31, 2026, at Washington, D.C.

/s/ Meryl Governski

[counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC. ET AL.,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
ADMISSION**

Trial Date: None

Date Action Filed: December 22, 2025

Judge: The Hon. V. Chhabria

1 **PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.**

2 **RESPONDING PARTY: CAMBRONNE INC.**

3 **SET NUMBER: ONE**

4 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendant Meta Platforms,
5 Inc. (“Meta”) requests that Plaintiff Cambronne Inc. (“Plaintiff”) admit or deny, separately and in
6 writing under oath, each of the matters set forth below (the “Requests”).

7 **DEFINITIONS**

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

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

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

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

17 4. ASSERTED WORK/ASSERTED WORKS means YOUR purportedly copyrighted
18 works that YOU have alleged in the ACTION and/or COMPLAINT that Meta has allegedly infringed.

19 5. PUBLICATION DATE means the first date on which: (a) a copy of an ASSERTED
20 WORK, in any format, was distributed to the public or to YOUR subscribers by sale or other transfer of
21 ownership, or by rental, lease or lending, or (b) YOU offered to distribute copies of an ASSERTED
22 WORK in any format to a group of persons for purposes of further distribution, public performance, or
23 public display.

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

27 7. GENERATIVE AI TOOL means any artificial intelligence (“AI”) system capable of
28

1 producing text, images, audio, video, or other audiovisual content (e.g., large language models and
2 diffusion models), including but not limited to ChatGPT, Gemini, Claude, Microsoft CoPilot, Meta.AI,
3 and Llama—including any and all versions or models thereof—and any internal or proprietary system,
4 tool, or platform with any such capabilities.

5 8. LLM means a generative AI large language model.

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

8 10. WEB CRAWLER means any automated program, script, bot, spider, or software agent
9 that systematically browses, indexes, downloads, or scrapes content from the internet, including without
10 limitation any tool used to harvest, collect, or copy text, data, files, or other content from web pages or
11 online repositories.

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

16 12. THIRD PARTY means all PERSONS other than YOU and Meta.

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

20 14. COMMUNICATION(S) is used in its broadest sense and means any transmission of
21 information from one PERSON to another by any means, including without limitation written
22 communications, telephone communications, in person communications, email, texts, Slack, instant
23 messaging, and other electronic communications.

24 15. DOCUMENT(S) means the original and all non-identical copies (including drafts and
25 those with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as defined in
26 Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil Procedure 34,
27 and includes papers of all kinds and information stored electronically, including by way of example and
28

without limitation, electronic mail, letters, communications, memoranda, notes, computer generated data, calendars, records, minutes, studies, reports, notebooks, messages, telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data, source code, data compilation, pictures, photographs, books, pamphlets, publications, advertisements, sales literature, brochures, manuals, price lists, announcements, and any other writings, records, or tangible objects produced or reproduced mechanically, electrically, electronically, photographically, or chemically. The term also includes any parent or child attachment or other documents embedded or linked in any way to a requested DOCUMENT.

16. CONCERNING or REFERRING or RELATING or REFLECTING or EVIDENCING are used interchangeably and shall mean constituting, relating to, reflecting, regarding, memorializing, identifying, embodying, referring to, pertaining to, commenting on, discussing, analyzing, considering, describing, containing, consisting of, connected to, indicating, supporting, or refuting.

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

INSTRUCTIONS

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

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

3. Meta requests that YOU admit or deny the truth of each statement or fact, application of law to fact, or opinions about either, set forth in the Requests below.

4. To the extent that YOU do not respond with either an unqualified admission or an objection (the reasons for which must be stated), YOU shall specifically deny the matter and set forth in

1 detail the reasons why YOU cannot truthfully admit the matter. Any such denial shall fairly meet the
 2 substance of the Request, and when good faith requires that YOU qualify an answer or deny only a part
 3 of the matter in which any admission is requested, YOU shall specify so much of it as is true and qualify
 4 or deny the remainder.

5 5. If, in responding to these Requests, YOU encounter any ambiguities when construing a
 6 Request, instruction, or definition, YOU shall set forth in YOUR response the matter deemed ambiguous
 7 and the construction used in responding.

8 6. YOU may not give lack of information or knowledge as the reason for failure to admit
 9 or deny unless YOU state that YOU have made reasonable inquiry and that the information known or
 10 readily obtainable by YOU is insufficient to enable YOU to admit or deny.

11 7. The fact that a Request covers a matter which YOU believe presents a genuine issue for
 12 trial may not, on that ground alone, provide the basis for an objection.

13 8. If a Request is silent as to the time period for which information is sought, YOUR
 14 response should include all information known to YOU CONCERNING events that occurred, in whole
 15 or in part, at any time during the period of 2021 to the present except for the Requests relating to
 16 Plaintiff's works, which should go back to the creation of the particular work(s) at issue.

17 9. Any Request set forth below to which there has not been an adequate and timely response
 18 may be deemed admitted and, therefore, conclusively established for purposes of this ACTION.

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

23 **REQUESTS FOR ADMISSION**

24 **REQUEST FOR ADMISSION NO. 1:**

25 Admit that YOU are unaware of any lost sales of any ASSERTED WORK due to any conduct
 26 of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 2:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that YOU have lost any sales of any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 3:

Admit that YOU are unaware of any specific licensing opportunity that YOU lost for any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 4:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that YOU lost any specific licensing opportunity for any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 5:

Admit that YOU are unaware of any PERSON that has opted not to purchase one of the ASSERTED WORKS due to that PERSON's use of META AI MODELS.

REQUEST FOR ADMISSION NO. 6:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that any PERSON has opted not to purchase one of the ASSERTED WORKS due to that PERSON's use of META AI MODELS.

REQUEST FOR ADMISSION NO. 7:

Admit that, for each ASSERTED WORK, more than fifty percent (50%) of all gross revenue was generated within the three (3) years immediately following its PUBLICATION DATE.

REQUEST FOR ADMISSION NO. 8:

Admit that no THIRD PARTY has offered YOU compensation to use any of the ASSERTED WORKS to train a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 9:

Admit that YOU are unaware of any COMMUNICATIONS preceding the initiation of the ACTION in which a THIRD PARTY offered or engaged in discussions concerning the potential to offer YOU compensation to use any of the ASSERTED WORKS to train a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 10:

Admit that YOU have never licensed any of the ASSERTED WORKS for actual or potential use in connection with development of a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 11:

Admit that YOU are unaware of any of the ASSERTED WORKS ever having been licensed for actual or potential use in connection with the development of a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 12:

Admit that YOU have not granted another PERSON the right to license the ASSERTED WORKS as training data for a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 13:

Admit that YOU are unaware of any instance in which a PERSON communicated to YOU that they chose not to purchase one or more of the ASSERTED WORKS due to that PERSON's decision to instead use META AI MODELS.

REQUEST FOR ADMISSION NO. 14:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING a PERSON communicating to YOU that they chose not to purchase one or more of the ASSERTED WORKS due to that PERSON's decision to instead use META AI MODELS.

REQUEST FOR ADMISSION NO. 15:

Admit that YOU have no DOCUMENTS EVIDENCING that any PERSON has offered any compensation to YOU for the use of any of the ASSERTED WORKS to train LLMs.

REQUEST FOR ADMISSION NO. 16:

Admit that YOU have no DOCUMENTS EVIDENCING that any PERSON has actually compensated YOU for use of any of the ASSERTED WORKS to train LLMs.

REQUEST FOR ADMISSION NO. 17:

Admit that YOU have no DOCUMENTS EVIDENCING that sales for the ASSERTED WORKS (including through any physical bookstore, online bookseller, or any other type of book wholesaler or retailer) decreased due to the alleged use of the ASSERTED WORKS to train GENERATIVE AI

1 TOOLS.

2 **REQUEST FOR ADMISSION NO. 18:**

3 Admit that YOU have no DOCUMENTS EVIDENCING that sales for the ASSERTED WORKS
4 (including through any physical bookstore, online bookseller, or any other type of book wholesaler or
5 retailer) decreased due to the alleged use of the ASSERTED WORKS to train META AI MODELS.

6 **REQUEST FOR ADMISSION NO. 19:**

7 Admit that YOU have not quantified how much of YOUR sales YOU allegedly lost due to the
8 use of the ASSERTED WORKS to develop or train any of the META AI MODELS.

9 **REQUEST FOR ADMISSION NO. 20:**

10 Admit that YOU have not quantified how much of YOUR sales YOU allegedly lost due to the
11 use of the ASSERTED WORKS to develop or train LLMs offered by THIRD PARTIES other than
12 Meta.

13 **REQUEST FOR ADMISSION NO. 21:**

14 Admit that, other than YOUR contention that LLM developers such as Meta should have
15 compensated YOU to allegedly use the ASSERTED WORKS to train LLMs, YOU are unaware of any
16 DOCUMENTS EVIDENCING any monetary injury that YOU have suffered due to any conduct of Meta
17 alleged in the COMPLAINT.

18 **REQUEST FOR ADMISSION NO. 22:**

19 Admit that YOU have used a GENERATIVE AI TOOL.

20 **REQUEST FOR ADMISSION NO. 23:**

21 Admit that YOU have used an LLM.

22 **REQUEST FOR ADMISSION NO. 24:**

23 Admit that YOU have used a META AI MODEL.

24 **REQUEST FOR ADMISSION NO. 25:**

25 Admit that each of the ASSERTED WORKS has been made available to the public.

26 **REQUEST FOR ADMISSION NO. 26:**

27 Admit that all of the ASSERTED WORKS are published.

REQUEST FOR ADMISSION NO. 27:

Admit that none of YOUR claims in the COMPLAINT are based on any of YOUR unpublished works.

REQUEST FOR ADMISSION NO. 28:

Admit that each of the ASSERTED WORKS had been made available to the public prior to the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 29:

Admit that the PUBLICATION DATE of each of the ASSERTED WORKS occurred before the commencement of the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 30:

Admit that the ASSERTED WORKS were all published prior to the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 31:

Admit that all of the ASSERTED WORKS are available to be read online either for free or for a fee.

REQUEST FOR ADMISSION NO. 32:

Admit that YOU do not contend that reviews of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 33:

Admit that YOU do not contend that reviews of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS unless they are substantially similar in protected expression.

REQUEST FOR ADMISSION NO. 34:

Admit that YOU do not contend that summaries of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 35:

Admit that YOU do not contend that summaries of the ASSERTED WORKS, whether prepared

1 by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS unless they are
2 substantially similar in protected expression.

3 **REQUEST FOR ADMISSION NO. 36:**

4 Admit that YOU are not aware of any DOCUMENTS EVIDENCING that any PERSON has
5 refused to license any of the ASSERTED WORKS due to any conduct of Meta.

6 **REQUEST FOR ADMISSION NO. 37:**

7 Admit that Meta did not create the Books3 dataset.

8 **REQUEST FOR ADMISSION NO. 38:**

9 Admit that YOU do not contend that Meta created the Books3 dataset.

10 **REQUEST FOR ADMISSION NO. 39:**

11 Admit that Meta did not create the LibGen (Library Genesis) dataset.

12 **REQUEST FOR ADMISSION NO. 40:**

13 Admit that YOU do not contend that Meta created the LibGen (Library Genesis) dataset.

14 **REQUEST FOR ADMISSION NO. 41:**

15 Admit that Meta did not create The Pile dataset.

16 **REQUEST FOR ADMISSION NO. 42:**

17 Admit that YOU do not contend that Meta created The Pile dataset.

18 **REQUEST FOR ADMISSION NO. 43:**

19 Admit that Meta did not create the Z-Library dataset.

20 **REQUEST FOR ADMISSION NO. 44:**

21 Admit that YOU do not contend that Meta created the Z-Library dataset.

22 **REQUEST FOR ADMISSION NO. 45:**

23 Admit that Meta did not create the Bibliotik dataset.

24 **REQUEST FOR ADMISSION NO. 46:**

25 Admit that YOU do not contend that Meta created the Bibliotik dataset.

26 **REQUEST FOR ADMISSION NO. 47:**

27 Admit that LLM developers other than Meta have used the Books3 dataset to train an LLM.
28

REQUEST FOR ADMISSION NO. 48:

Admit that LLM developers other than Meta have used the LibGen (Library Genesis) dataset to train an LLM.

REQUEST FOR ADMISSION NO. 49:

Admit that LLM developers other than Meta have used The Pile dataset to train an LLM.

REQUEST FOR ADMISSION NO. 50:

Admit that LLM developers other than Meta have used the Z-Library dataset to train an LLM.

REQUEST FOR ADMISSION NO. 51:

Admit that LLM developers other than Meta have used the Bibliotik dataset to train an LLM.

REQUEST FOR ADMISSION NO. 52:

Admit that YOU are aware that the ASSERTED WORKS have been a part of a dataset that has been used to train LLMs beyond META AI MODELS.

REQUEST FOR ADMISSION NO. 53:

Admit that YOU have been aware that the ASSERTED WORKS have been a part of a dataset that was used to train LLMs since before November 6, 2022.

REQUEST FOR ADMISSION NO. 54:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Books3 dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 55:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the LibGen (Library Genesis) dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 56:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed The Pile dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 57:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Z-Library dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 58:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Bibliotik dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 59:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Books3 dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 60:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the LibGen (Library Genesis) dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 61:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed The Pile dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 62:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Z-Library dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 63:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Bibliotik dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 64:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that a THIRD PARTY received an entire copy of any of the ASSERTED WORKS from Meta.

REQUEST FOR ADMISSION NO. 65:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that a THIRD PARTY received a copy of any of the ASSERTED WORKS from Meta that was capable of being read or viewed as legible text.

REQUEST FOR ADMISSION NO. 66:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that any THIRD PARTY

received from Meta any files or data that are substantially similar in protected expression to any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 67:

Admit that YOU cannot identify a single PERSON who received a legible copy of one of the ASSERTED WORKS from Meta.

REQUEST FOR ADMISSION NO. 68:

Admit that YOU cannot identify a single PERSON who received an entire copy of any of the ASSERTED WORKS from Meta.

REQUEST FOR ADMISSION NO. 69:

Admit that a THIRD PARTY does not need to purchase a copy of those ASSERTED WORKS that are available to read on YOUR website through a subscription.

REQUEST FOR ADMISSION NO. 70:

Admit that YOU are not aware of any agreements to assign rights in or to the ASSERTED WORKS that have not already been produced in this ACTION.

REQUEST FOR ADMISSION NO. 71:

Admit that YOU are aware that at least one of YOUR employees used META AI MODELS prior to the filing of the COMPLAINT.

REQUEST FOR ADMISSION NO. 72:

Admit that YOU publish works on YOUR website that were edited or created using a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 73:

Admit that YOU have used GENERATIVE AI TOOLS other than META AI MODELS in connection with at least one work published by YOU.

REQUEST FOR ADMISSION NO. 74:

Admit that YOU have used a WEB CRAWLER to download publicly available data from the internet for the purpose of developing a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 75:

Admit that YOU have in YOUR possession, custody, or control data obtained from a WEB CRAWLER that includes unlicensed THIRD PARTY copyrighted works.

REQUEST FOR ADMISSION NO. 76:

Admit that YOU have downloaded at least one dataset that contains at least one THIRD PARTY copyrighted work without the authorization of that THIRD PARTY.

REQUEST FOR ADMISSION NO. 77:

Admit that YOU rely on the REGISTRATION MATERIALS identified in Dkt. 63-1 to establish ownership of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 78:

Admit that certain of the ASSERTED WORKS are later editions that claim copyright only in new and revised text and exclude material covered by prior registrations.

REQUEST FOR ADMISSION NO. 79:

Admit that all of the ASSERTED WORKS are works of nonfiction.

REQUEST FOR ADMISSION NO. 80:

Admit that the general subject matter of each ASSERTED WORK is discussed in public sources available for free online.

REQUEST FOR ADMISSION NO. 81:

Admit that prior to filing the ACTION YOU did not identify specific META AI MODEL outputs that reproduce verbatim protected expression from any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 82:

Admit that YOU do not possess logs or other direct technical evidence that any META AI MODEL was trained on specific files containing any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 83:

Admit that YOU do not have any DOCUMENTS EVIDENCING that Meta “seeded” any ASSERTED WORK via BitTorrent.

REQUEST FOR ADMISSION NO. 84:

Admit that YOU have not conducted an analysis that isolates META AI MODELS (as opposed to other market factors or THIRD PARTY LLMs) as the cause of any alleged sales decline of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 85:

Admit that YOU have not conducted an analysis that isolates META AI MODELS (as opposed to other market factors or THIRD PARTY LLMs) as the cause of any alleged harm to the market for any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 86:

Admit that YOU did not conduct an analysis that isolates Generative AI (as opposed to other market factors) as the cause of any alleged sales decline of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 87:

Admit that YOU did not conduct an analysis that isolates Generative AI (as opposed to other market factors) as the cause of any alleged harm to the market for any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 88:

Admit that many of YOUR alleged market-harm theories assert displacement by LLM outputs generally rather than by META AI MODELS' outputs reproducing the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 89:

Admit that some ASSERTED WORKS are collective issues of Chicken Soup for the Soul books and that YOU rely on collective-work registrations to claim rights in constituent contributions.

REQUEST FOR ADMISSION NO. 90:

Admit that YOU do not have a written assignment from every individual contributor of each collective book asserted by YOU in the COMPLAINT.

REQUEST FOR ADMISSION NO. 91:

Admit that YOU have not identified any PERSON who declined to purchase an ASSERTED WORK because of a META AI MODEL output.

REQUEST FOR ADMISSION NO. 92:

Admit that YOU have not identified any PERSON who declined to purchase an ASSERTED WORK because of a META AI MODEL output that reproduced protected expression from that ASSERTED WORK.

REQUEST FOR ADMISSION NO. 93:

Admit that YOU have not identified any PERSON who declined to purchase a subscription to access YOUR content because of a META AI MODEL output.

REQUEST FOR ADMISSION NO. 94:

Admit that YOU have not identified any PERSON who declined to purchase a subscription to access YOUR content because of a META AI MODEL output that reproduced protected expression from that ASSERTED WORK.

REQUEST FOR ADMISSION NO. 95:

Admit that YOU have developed an AI tool that creates content.

REQUEST FOR ADMISSION NO. 96:

Admit that YOU have published content on YOUR website that was created, in whole or in part, using Generative AI.

REQUEST FOR ADMISSION NO. 97:

Admit that YOU are not the author of the ASSERTED WORK entitled “Bad Blood: Secrets and Lies in a Silicon Valley Startup” (Registration No. TX0008666026) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 98:

Admit that YOU cannot identify by name any THIRD PARTY who allegedly received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 99:

Admit that YOU have no documents showing that a THIRD PARTY received from Meta via TORRENTING a complete READABLE copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 100:

Admit that YOU have no documents showing that a THIRD PARTY received from Meta via TORRENTING a copy of any section or portion of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 101:

Admit that YOU are unable to identify by name any THIRD PARTY who read a copy of one of YOUR ASSERTED WORKS that the THIRD PARTY received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 102:

Admit that YOU have no evidence of how any THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS later used that copy.

REQUEST FOR ADMISSION NO. 103:

Admit that YOU have no evidence showing that a THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS did not use that copy for purposes of commentary or criticism.

REQUEST FOR ADMISSION NO. 104:

Admit that YOU have no evidence showing that a THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS did not use that copy for a fair use purpose under 17 U.S.C. § 107.

REQUEST FOR ADMISSION NO. 105:

Admit that YOU have not spoken with any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 106:

Admit that YOU have not contacted any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 107:

Admit that YOU have not identified any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 108:

Admit that YOU are unable to identify any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS that engaged in direct copyright infringement of the same ASSERTED WORK.

REQUEST FOR ADMISSION NO. 109:

Admit that YOU cannot identify any direct copyright infringement committed by a THIRD PARTY who allegedly received from Meta via TORRENTING any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 110:

Admit that, for any of YOUR ASSERTED WORKS that were allegedly uploaded by Meta via TORRENTING, YOU have no evidence that YOUR ASSERTED WORKS were READABLE.

REQUEST FOR ADMISSION NO. 111:

Admit that YOU have no documents evidencing that anybody read any of YOUR ASSERTED WORKS as a result of receiving that work from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 112:

Admit that YOU do not know whether any THIRD PARTY read a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 113:

Admit that YOU do not know whether any THIRD PARTY displayed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 114:

Admit that YOU do not know whether any THIRD PARTY redistributed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 115:

Admit that YOU do not know whether any THIRD PARTY performed any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 116:

Admit that YOU do not know whether any THIRD PARTY made fair use of a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 117:

Admit that YOU do not know whether any THIRD PARTY's use of any ASSERTED WORK received from Meta via TORRENTING was not fair use.

REQUEST FOR ADMISSION NO. 118:

Admit that YOU have no documents evidencing whether any THIRD PARTY read a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 119:

Admit that YOU have no documents evidencing whether any THIRD PARTY displayed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 120:

Admit that YOU have no documents evidencing whether any THIRD PARTY redistributed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 121:

Admit that YOU have no documents evidencing whether any THIRD PARTY performed any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 122:

Admit that YOU have no documents evidencing whether any THIRD PARTY made fair use of a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 123:

Admit that YOU have no documents evidencing that any THIRD PARTY's use of any ASSERTED WORK received from Meta via TORRENTING was not fair use.

REQUEST FOR ADMISSION NO. 124:

Admit that YOU cannot identify how many complete copies of YOUR ASSERTED WORKS were allegedly distributed by Meta via TORRENTING to any THIRD PARTY. Complete means all pages of the ASSERTED WORK are present.

REQUEST FOR ADMISSION NO. 125:

Admit that YOU cannot identify any complete copy of YOUR ASSERTED WORKS that was distributed by Meta via TORRENTING to a THIRD PARTY.

REQUEST FOR ADMISSION NO. 126:

Admit that YOU have no documents evidencing that YOU lost any book sales because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 127:

Admit that YOU have no documents evidencing that YOU lost any revenue because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 128:

Admit that YOU are unable to calculate any revenue lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 129:

Admit that YOU are unable to identify a specific subscription that YOU lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 130:

Admit that YOU are unable to identify a specific book sale that YOU lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

1 Dated: July 31, 2026

2 /s/ Meryl Governski
3 DUNN ISAACSON RHEE LLP
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Meta Platforms, Inc.

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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 ADMISSION**

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

on the following party(ies) in this action:

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Executed on July 31, 2026, at Washington, D.C.

/s/ Meryl Governski

[counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC. ET AL.,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF REQUESTS FOR
ADMISSION**

Trial Date: None

Date Action Filed: December 22, 2025

Judge: The Hon. V. Chhabria

1 **PROPOUNDING PARTY:** **DEFENDANT META PLATFORMS, INC.**

2 **RESPONDING PARTY:** **MATTHEW SACKS**

3 **SET NUMBER:** **ONE**

4 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendant Meta Platforms,
5 Inc. (“Meta”) requests that Plaintiff Matthew Sacks (“Plaintiff”) admit or deny, separately and in writing
6 under oath, each of the matters set forth below (the “Requests”).

7 **DEFINITIONS**

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

11 1. YOU, YOUR, or YOURS mean Plaintiff Matthew Sacks and all officers, directors,
12 employees, agents, attorneys, and other persons acting or purporting to act on his behalf.

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

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

16 4. ASSERTED WORK/ASSERTED WORKS means YOUR purportedly copyrighted
17 works that YOU have alleged in the ACTION and/or COMPLAINT that Meta has allegedly infringed.

18 5. PUBLICATION DATE means the first date on which: (a) a copy of an ASSERTED
19 WORK, in any format, was distributed to the public or to YOUR subscribers by sale or other transfer of
20 ownership, or by rental, lease or lending, or (b) YOU offered to distribute copies of an ASSERTED
21 WORK in any format to a group of persons for purposes of further distribution, public performance, or
22 public display.

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

26 7. GENERATIVE AI TOOL means any artificial intelligence (“AI”) system capable of
27 producing text, images, audio, video, or other audiovisual content (e.g., large language models and
28

diffusion models), including but not limited to ChatGPT, Gemini, Claude, Microsoft CoPilot, 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.

8. LLM means a generative AI large language model.

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

10. WEB CRAWLER means any automated program, script, bot, spider, or software agent that systematically browses, indexes, downloads, or scrapes content from the internet, including without limitation any tool used to harvest, collect, or copy text, data, files, or other content from web pages or online repositories.

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

12. THIRD PARTY means all PERSONS other than YOU and Meta.

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

14. COMMUNICATION(S) is used in its broadest sense and means any transmission of information from one PERSON to another by any means, including without limitation written communications, telephone communications, in person communications, email, texts, Slack, instant messaging, and other electronic communications.

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

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

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

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

15 **INSTRUCTIONS**

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

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

23 3. Meta requests that YOU admit or deny the truth of each statement or fact, application of
 24 law to fact, or opinions about either, set forth in the Requests below.

25 4. To the extent that YOU do not respond with either an unqualified admission or an
 26 objection (the reasons for which must be stated), YOU shall specifically deny the matter and set forth in
 27 detail the reasons why YOU cannot truthfully admit the matter. Any such denial shall fairly meet the
 28

1 substance of the Request, and when good faith requires that YOU qualify an answer or deny only a part
2 of the matter in which any admission is requested, YOU shall specify so much of it as is true and qualify
3 or deny the remainder.

4 5. If, in responding to these Requests, YOU encounter any ambiguities when construing a
5 Request, instruction, or definition, YOU shall set forth in YOUR response the matter deemed ambiguous
6 and the construction used in responding.

7 6. YOU may not give lack of information or knowledge as the reason for failure to admit
8 or deny unless YOU state that YOU have made reasonable inquiry and that the information known or
9 readily obtainable by YOU is insufficient to enable YOU to admit or deny.

10 7. The fact that a Request covers a matter which YOU believe presents a genuine issue for
11 trial may not, on that ground alone, provide the basis for an objection.

12 8. If a Request is silent as to the time period for which information is sought, YOUR
13 response should include all information known to YOU CONCERNING events that occurred, in whole
14 or in part, at any time during the period of 2021 to the present except for the Requests relating to
15 Plaintiff's works, which should go back to the creation of the particular work(s) at issue.

16 9. Any Request set forth below to which there has not been an adequate and timely response
17 may be deemed admitted and, therefore, conclusively established for purposes of this ACTION.

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

22 **REQUESTS FOR ADMISSION**

23 **REQUEST FOR ADMISSION NO. 1:**

24 Admit that YOU are unaware of any lost sales of any ASSERTED WORK due to any conduct
25 of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 2:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that YOU have lost any sales of any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 3:

Admit that YOU are unaware of any specific licensing opportunity that YOU lost for any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 4:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that YOU lost any specific licensing opportunity for any ASSERTED WORK due to any conduct of Meta alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 5:

Admit that YOU are unaware of any PERSON that has opted not to purchase one of the ASSERTED WORKS due to that PERSON's use of META AI MODELS.

REQUEST FOR ADMISSION NO. 6:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING that any PERSON has opted not to purchase one of the ASSERTED WORKS due to that PERSON's use of META AI MODELS.

REQUEST FOR ADMISSION NO. 7:

Admit that, for each ASSERTED WORK, more than fifty percent (50%) of all gross revenue was generated within the three (3) years immediately following its PUBLICATION DATE.

REQUEST FOR ADMISSION NO. 8:

Admit that no THIRD PARTY has offered YOU compensation to use any of the ASSERTED WORKS to train a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 9:

Admit that YOU are unaware of any COMMUNICATIONS preceding the initiation of the ACTION in which a THIRD PARTY offered or engaged in discussions concerning the potential to offer YOU compensation to use any of the ASSERTED WORKS to train a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 10:

Admit that YOU have never licensed any of the ASSERTED WORKS for actual or potential use in connection with development of a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 11:

Admit that YOU are unaware of any of the ASSERTED WORKS ever having been licensed for actual or potential use in connection with the development of a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 12:

Admit that YOU have not granted another PERSON the right to license the ASSERTED WORKS as training data for a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 13:

Admit that YOU are unaware of any instance in which a PERSON communicated to YOU that they chose not to purchase one or more of the ASSERTED WORKS due to that PERSON's decision to instead use META AI MODELS.

REQUEST FOR ADMISSION NO. 14:

Admit that YOU are unaware of any DOCUMENTS EVIDENCING a PERSON communicating to YOU that they chose not to purchase one or more of the ASSERTED WORKS due to that PERSON's decision to instead use META AI MODELS.

REQUEST FOR ADMISSION NO. 15:

Admit that YOU have no DOCUMENTS EVIDENCING that any PERSON has offered any compensation to YOU for the use of any of the ASSERTED WORKS to train LLMs.

REQUEST FOR ADMISSION NO. 16:

Admit that YOU have no DOCUMENTS EVIDENCING that any PERSON has actually compensated YOU for use of any of the ASSERTED WORKS to train LLMs.

REQUEST FOR ADMISSION NO. 17:

Admit that YOU have no DOCUMENTS EVIDENCING that sales for the ASSERTED WORKS (including through any physical bookstore, online bookseller, or any other type of book wholesaler or retailer) decreased due to the alleged use of the ASSERTED WORKS to train GENERATIVE AI

1 TOOLS.

2 **REQUEST FOR ADMISSION NO. 18:**

3 Admit that YOU have no DOCUMENTS EVIDENCING that sales for the ASSERTED WORKS
4 (including through any physical bookstore, online bookseller, or any other type of book wholesaler or
5 retailer) decreased due to the alleged use of the ASSERTED WORKS to train META AI MODELS.

6 **REQUEST FOR ADMISSION NO. 19:**

7 Admit that YOU have not quantified how much of YOUR sales YOU allegedly lost due to the
8 use of the ASSERTED WORKS to develop or train any of the META AI MODELS.

9 **REQUEST FOR ADMISSION NO. 20:**

10 Admit that YOU have not quantified how much of YOUR sales YOU allegedly lost due to the
11 use of the ASSERTED WORKS to develop or train LLMs offered by THIRD PARTIES other than
12 Meta.

13 **REQUEST FOR ADMISSION NO. 21:**

14 Admit that, other than YOUR contention that LLM developers such as Meta should have
15 compensated YOU to allegedly use the ASSERTED WORKS to train LLMs, YOU are unaware of any
16 DOCUMENTS EVIDENCING any monetary injury that YOU have suffered due to any conduct of Meta
17 alleged in the COMPLAINT.

18 **REQUEST FOR ADMISSION NO. 22:**

19 Admit that YOU have used a GENERATIVE AI TOOL.

20 **REQUEST FOR ADMISSION NO. 23:**

21 Admit that YOU have used an LLM.

22 **REQUEST FOR ADMISSION NO. 24:**

23 Admit that YOU have used a META AI MODEL.

24 **REQUEST FOR ADMISSION NO. 25:**

25 Admit that each of the ASSERTED WORKS has been made available to the public.

26 **REQUEST FOR ADMISSION NO. 26:**

27 Admit that all of the ASSERTED WORKS are published.

REQUEST FOR ADMISSION NO. 27:

Admit that none of YOUR claims in the COMPLAINT are based on any of YOUR unpublished works.

REQUEST FOR ADMISSION NO. 28:

Admit that each of the ASSERTED WORKS had been made available to the public prior to the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 29:

Admit that the PUBLICATION DATE of each of the ASSERTED WORKS occurred before the commencement of the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 30:

Admit that the ASSERTED WORKS were all published prior to the purported infringement alleged in the COMPLAINT.

REQUEST FOR ADMISSION NO. 31:

Admit that all of the ASSERTED WORKS are available to be read online either for free or for a fee.

REQUEST FOR ADMISSION NO. 32:

Admit that YOU do not contend that reviews of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 33:

Admit that YOU do not contend that reviews of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS unless they are substantially similar in protected expression.

REQUEST FOR ADMISSION NO. 34:

Admit that YOU do not contend that summaries of the ASSERTED WORKS, whether prepared by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 35:

Admit that YOU do not contend that summaries of the ASSERTED WORKS, whether prepared

1 by a human or an LLM, infringe YOUR copyright(s) in the ASSERTED WORKS unless they are
2 substantially similar in protected expression.

3 **REQUEST FOR ADMISSION NO. 36:**

4 Admit that YOU are not aware of any DOCUMENTS EVIDENCING that any PERSON has
5 refused to license any of the ASSERTED WORKS due to any conduct of Meta.

6 **REQUEST FOR ADMISSION NO. 37:**

7 Admit that Meta did not create the Books3 dataset.

8 **REQUEST FOR ADMISSION NO. 38:**

9 Admit that YOU do not contend that Meta created the Books3 dataset.

10 **REQUEST FOR ADMISSION NO. 39:**

11 Admit that Meta did not create the LibGen (Library Genesis) dataset.

12 **REQUEST FOR ADMISSION NO. 40:**

13 Admit that YOU do not contend that Meta created the LibGen (Library Genesis) dataset.

14 **REQUEST FOR ADMISSION NO. 41:**

15 Admit that Meta did not create The Pile dataset.

16 **REQUEST FOR ADMISSION NO. 42:**

17 Admit that YOU do not contend that Meta created The Pile dataset.

18 **REQUEST FOR ADMISSION NO. 43:**

19 Admit that Meta did not create the Z-Library dataset.

20 **REQUEST FOR ADMISSION NO. 44:**

21 Admit that YOU do not contend that Meta created the Z-Library dataset.

22 **REQUEST FOR ADMISSION NO. 45:**

23 Admit that Meta did not create the Bibliotik dataset.

24 **REQUEST FOR ADMISSION NO. 46:**

25 Admit that YOU do not contend that Meta created the Bibliotik dataset.

26 **REQUEST FOR ADMISSION NO. 47:**

27 Admit that LLM developers other than Meta have used the Books3 dataset to train an LLM.
28

REQUEST FOR ADMISSION NO. 48:

Admit that LLM developers other than Meta have used the LibGen (Library Genesis) dataset to train an LLM.

REQUEST FOR ADMISSION NO. 49:

Admit that LLM developers other than Meta have used The Pile dataset to train an LLM.

REQUEST FOR ADMISSION NO. 50:

Admit that LLM developers other than Meta have used the Z-Library dataset to train an LLM.

REQUEST FOR ADMISSION NO. 51:

Admit that LLM developers other than Meta have used the Bibliotik dataset to train an LLM.

REQUEST FOR ADMISSION NO. 52:

Admit that YOU are aware that the ASSERTED WORKS have been a part of a dataset that has been used to train LLMs beyond META AI MODELS.

REQUEST FOR ADMISSION NO. 53:

Admit that YOU have been aware that the ASSERTED WORKS have been a part of a dataset that was used to train LLMs since before November 6, 2022.

REQUEST FOR ADMISSION NO. 54:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Books3 dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 55:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the LibGen (Library Genesis) dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 56:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed The Pile dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 57:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Z-Library dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 58:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Bibliotik dataset to any THIRD PARTY.

REQUEST FOR ADMISSION NO. 59:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Books3 dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 60:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the LibGen (Library Genesis) dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 61:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed The Pile dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 62:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Z-Library dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 63:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that Meta distributed the Bibliotik dataset in exchange for compensation.

REQUEST FOR ADMISSION NO. 64:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that a THIRD PARTY received an entire copy of any of the ASSERTED WORKS from Meta.

REQUEST FOR ADMISSION NO. 65:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that a THIRD PARTY received a copy of any of the ASSERTED WORKS from Meta that was capable of being read or viewed as legible text.

REQUEST FOR ADMISSION NO. 66:

Admit that YOU are not aware of any DOCUMENTS EVIDENCING that any THIRD PARTY

received from Meta any files or data that are substantially similar in protected expression to any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 67:

Admit that YOU cannot identify a single PERSON who received a legible copy of one of the ASSERTED WORKS from Meta.

REQUEST FOR ADMISSION NO. 68:

Admit that YOU cannot identify a single PERSON who received an entire copy of any of the ASSERTED WORKS from Meta.

REQUEST FOR ADMISSION NO. 69:

Admit that a THIRD PARTY does not need to purchase a copy of those ASSERTED WORKS that are available to read on YOUR website through a subscription.

REQUEST FOR ADMISSION NO. 70:

Admit that YOU are not aware of any agreements to assign rights in or to the ASSERTED WORKS that have not already been produced in this ACTION.

REQUEST FOR ADMISSION NO. 71:

Admit that YOU are aware that at least one of YOUR employees used META AI MODELS prior to the filing of the COMPLAINT.

REQUEST FOR ADMISSION NO. 72:

Admit that YOU publish works on YOUR website that were edited or created using a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 73:

Admit that YOU have used GENERATIVE AI TOOLS other than META AI MODELS in connection with at least one work published by YOU.

REQUEST FOR ADMISSION NO. 74:

Admit that YOU have used a WEB CRAWLER to download publicly available data from the internet for the purpose of developing a GENERATIVE AI TOOL.

REQUEST FOR ADMISSION NO. 75:

Admit that YOU have in YOUR possession, custody, or control data obtained from a WEB CRAWLER that includes unlicensed THIRD PARTY copyrighted works.

REQUEST FOR ADMISSION NO. 76:

Admit that YOU have downloaded at least one dataset that contains at least one THIRD PARTY copyrighted work without the authorization of that THIRD PARTY.

REQUEST FOR ADMISSION NO. 77:

Admit that YOU rely on the REGISTRATION MATERIALS identified in Dkt. 63-1 to establish ownership of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 78:

Admit that certain of the ASSERTED WORKS are later editions that claim copyright only in new and revised text and exclude material covered by prior registrations.

REQUEST FOR ADMISSION NO. 79:

Admit that all of the ASSERTED WORKS are works of nonfiction.

REQUEST FOR ADMISSION NO. 80:

Admit that the general subject matter of each ASSERTED WORK is discussed in public sources available for free online.

REQUEST FOR ADMISSION NO. 81:

Admit that prior to filing the ACTION YOU did not identify specific META AI MODEL outputs that reproduce verbatim protected expression from any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 82:

Admit that YOU do not possess logs or other direct technical evidence that any META AI MODEL was trained on specific files containing any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 83:

Admit that YOU do not have any DOCUMENTS EVIDENCING that Meta “seeded” any ASSERTED WORK via BitTorrent.

REQUEST FOR ADMISSION NO. 84:

Admit that YOU have not conducted an analysis that isolates META AI MODELS (as opposed to other market factors or THIRD PARTY LLMs) as the cause of any alleged sales decline of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 85:

Admit that YOU have not conducted an analysis that isolates META AI MODELS (as opposed to other market factors or THIRD PARTY LLMs) as the cause of any alleged harm to the market for any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 86:

Admit that YOU did not conduct an analysis that isolates Generative AI (as opposed to other market factors) as the cause of any alleged sales decline of the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 87:

Admit that YOU did not conduct an analysis that isolates Generative AI (as opposed to other market factors) as the cause of any alleged harm to the market for any ASSERTED WORK.

REQUEST FOR ADMISSION NO. 88:

Admit that many of YOUR alleged market-harm theories assert displacement by LLM outputs generally rather than by META AI MODELS' outputs reproducing the ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 89:

Admit that some ASSERTED WORKS are collective issues of Chicken Soup for the Soul books and that YOU rely on collective-work registrations to claim rights in constituent contributions.

REQUEST FOR ADMISSION NO. 90:

Admit that YOU do not have a written assignment from every individual contributor of each collective book asserted by YOU in the COMPLAINT.

REQUEST FOR ADMISSION NO. 91:

Admit that YOU have not identified any PERSON who declined to purchase an ASSERTED WORK because of a META AI MODEL output.

REQUEST FOR ADMISSION NO. 92:

Admit that YOU have not identified any PERSON who declined to purchase an ASSERTED WORK because of a META AI MODEL output that reproduced protected expression from that ASSERTED WORK.

REQUEST FOR ADMISSION NO. 93:

Admit that YOU have not identified any PERSON who declined to purchase a subscription to access YOUR content because of a META AI MODEL output.

REQUEST FOR ADMISSION NO. 94:

Admit that YOU have not identified any PERSON who declined to purchase a subscription to access YOUR content because of a META AI MODEL output that reproduced protected expression from that ASSERTED WORK.

REQUEST FOR ADMISSION NO. 95:

Admit that YOU have developed an AI tool that creates content.

REQUEST FOR ADMISSION NO. 96:

Admit that YOU have published content on YOUR website that was created, in whole or in part, using Generative AI.

REQUEST FOR ADMISSION NO. 97:

Admit that YOU are not the author of the ASSERTED WORK entitled “Bad Blood: Secrets and Lies in a Silicon Valley Startup” (Registration No. TX0008666026) (as “author” is defined by 17 U.S.C. § 201(a)) in whom initial ownership of the copyright in such ASSERTED WORK vested.

REQUEST FOR ADMISSION NO. 98:

Admit that YOU cannot identify by name any THIRD PARTY who allegedly received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 99:

Admit that YOU have no documents showing that a THIRD PARTY received from Meta via TORRENTING a complete READABLE copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 100:

Admit that YOU have no documents showing that a THIRD PARTY received from Meta via TORRENTING a copy of any section or portion of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 101:

Admit that YOU are unable to identify by name any THIRD PARTY who read a copy of one of YOUR ASSERTED WORKS that the THIRD PARTY received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 102:

Admit that YOU have no evidence of how any THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS later used that copy.

REQUEST FOR ADMISSION NO. 103:

Admit that YOU have no evidence showing that a THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS did not use that copy for purposes of commentary or criticism.

REQUEST FOR ADMISSION NO. 104:

Admit that YOU have no evidence showing that a THIRD PARTY who allegedly received from Meta via TORRENTING a copy of one of YOUR ASSERTED WORKS did not use that copy for a fair use purpose under 17 U.S.C. § 107.

REQUEST FOR ADMISSION NO. 105:

Admit that YOU have not spoken with any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 106:

Admit that YOU have not contacted any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 107:

Admit that YOU have not identified any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 108:

Admit that YOU are unable to identify any THIRD PARTY who received from Meta via TORRENTING a copy of any of YOUR ASSERTED WORKS that engaged in direct copyright infringement of the same ASSERTED WORK.

REQUEST FOR ADMISSION NO. 109:

Admit that YOU cannot identify any direct copyright infringement committed by a THIRD PARTY who allegedly received from Meta via TORRENTING any of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 110:

Admit that, for any of YOUR ASSERTED WORKS that were allegedly uploaded by Meta via TORRENTING, YOU have no evidence that YOUR ASSERTED WORKS were READABLE.

REQUEST FOR ADMISSION NO. 111:

Admit that YOU have no documents evidencing that anybody read any of YOUR ASSERTED WORKS as a result of receiving that work from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 112:

Admit that YOU do not know whether any THIRD PARTY read a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 113:

Admit that YOU do not know whether any THIRD PARTY displayed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 114:

Admit that YOU do not know whether any THIRD PARTY redistributed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 115:

Admit that YOU do not know whether any THIRD PARTY performed any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 116:

Admit that YOU do not know whether any THIRD PARTY made fair use of a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 117:

Admit that YOU do not know whether any THIRD PARTY's use of any ASSERTED WORK received from Meta via TORRENTING was not fair use.

REQUEST FOR ADMISSION NO. 118:

Admit that YOU have no documents evidencing whether any THIRD PARTY read a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 119:

Admit that YOU have no documents evidencing whether any THIRD PARTY displayed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 120:

Admit that YOU have no documents evidencing whether any THIRD PARTY redistributed a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 121:

Admit that YOU have no documents evidencing whether any THIRD PARTY performed any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 122:

Admit that YOU have no documents evidencing whether any THIRD PARTY made fair use of a copy of any of YOUR ASSERTED WORKS that they received from Meta via TORRENTING.

REQUEST FOR ADMISSION NO. 123:

Admit that YOU have no documents evidencing that any THIRD PARTY's use of any ASSERTED WORK received from Meta via TORRENTING was not fair use.

REQUEST FOR ADMISSION NO. 124:

Admit that YOU cannot identify how many complete copies of YOUR ASSERTED WORKS were allegedly distributed by Meta via TORRENTING to any THIRD PARTY. Complete means all pages of the ASSERTED WORK are present.

REQUEST FOR ADMISSION NO. 125:

Admit that YOU cannot identify any complete copy of YOUR ASSERTED WORKS that was distributed by Meta via TORRENTING to a THIRD PARTY.

REQUEST FOR ADMISSION NO. 126:

Admit that YOU have no documents evidencing that YOU lost any book sales because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 127:

Admit that YOU have no documents evidencing that YOU lost any revenue because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 128:

Admit that YOU are unable to calculate any revenue lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 129:

Admit that YOU are unable to identify a specific subscription that YOU lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

REQUEST FOR ADMISSION NO. 130:

Admit that YOU are unable to identify a specific book sale that YOU lost because of Meta's alleged distribution via TORRENTING to a THIRD PARTY of YOUR ASSERTED WORKS.

1 Dated: July 31, 2026

2 /s/ Meryl Governski
3 DUNN ISAACSON RHEE LLP
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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 ADMISSION**

☒ (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 July 31, 2026, at Washington, D.C.

/s/ Meryl Governski