

EXHIBIT N

DUNN ISAACSON RHEE LLP
KAREN L. DUNN (*pro hac vice*)
(kdunn@dirllp.com)
JESSICA E. PHILLIPS (*pro hac vice*)
(jphillips@dirllp.com)
KYLE N. SMITH (*pro hac vice*)
(ksmith@dirllp.com)
401 9th Street NW
Washington, DC 20004
Telephone: (202) 240-2900

CLEARY GOTTlieb STEEN &
HAMILTON LLP
ANGELA L. DUNNING (212047)
adunning@cgsh.com
151 University Ave
Palo Alto, CA 94301
Telephone: (650) 815-4131

Attorneys for Defendant Meta Platforms, Inc.

COOLEY LLP
MARK R. WEINSTEIN (193043)
mweinstein@cooley.com
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
PHILLIP E. MORTON (*pro hac vice*)
pmorton@cooley.com
1299 Pennsylvania Avenue NW, Suite 700
Washington, DC 20004
Telephone: (202) 842-7800

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 SECOND SET OF
INTERROGATORIES TO PLAINTIFF
COGNELLA, INC.**

Trial Date: None

Date Action Filed: May 4, 2026

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF COGNELLA, INC.

Set Number: TWO (2)

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Plaintiff Cognella, Inc. (“Cognella” or “Plaintiff”) answer completely and in writing under oath within (30) days of service hereof each of the interrogatories set forth below (“Interrogatories”).

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 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. AGENT means any current or former agent, representative, employee, attorney, or other PERSON acting for YOU or on YOUR behalf with YOUR knowledge or authorization (express or implied).

3. ACTION means the lawsuit titled *Cognella, Inc., LLC v. Meta Platforms, Inc.*, Case No. 3:26-cv-04053-VC.

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

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

6. 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.

1
2 7. THIRD PARTY means all PERSONS other than the named Parties to this ACTION.

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

7 9. DOCUMENT(S) means the original and all non-identical copies (including drafts and those
8 with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as defined in
9 Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil Procedure
10 34, and includes papers of all kinds and electronically stored information, including by way of
11 example and without limitation, electronic mail, letters, communications, memoranda, notes,
12 computer generated data, calendars, records, minutes, studies, reports, notebooks, messages,
13 telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written
14 notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data,
15 source code, data compilation, pictures, photographs, books, pamphlets, publications,
16 advertisements, sales literature, brochures, manuals, price lists, announcements, and any other
17 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.

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

23 11. DESCRIBE means to provide a detailed narrative statement or description of the specific
24 facts or matters to which an Interrogatory refers, including, but not limited to, an identification of
25 all PERSONS, COMMUNICATIONS, acts, transactions, events, agreements, recommendations,
26

1 and DOCUMENTS used, necessary, or desirable to support such statement or make the description
2 complete.

3 12. IDENTIFY (and variations thereof) means the following:

- 4 1. With respect to a natural person, provide the person's: (i) full name; (ii) current or
5 last known home address; (iii) current or last known business address; (iv) current
6 or last known email address; (v) current or last known occupation, employer and
7 business position or title; and (vi) current or last known telephone number.
- 8 2. With respect to an entity which is not a natural person, provide: (i) the full name of
9 the entity; (ii) the type of entity (e.g., corporation, partnership, sole proprietorship,
10 association); (iii) the name, address and telephone number of its principal place of
11 business; (iv) all names under which it is doing, or has ever done, business; (v) the
12 name(s) of the contact person(s); and (vi) the date or interval when such entity stood
13 in the capacity referenced by the interrogatory.
- 14 3. With respect to an event or action, (i) provide the date of the event or action; (ii)
15 state the person(s) present or involved; (iii) state the place or places where the event
16 or action took place.
- 17 4. With respect to a DOCUMENT, (i) state the originator, author, addressee, recipient;
18 (ii) describe the contents; (iii) state the date of the document; and (iv) identify all
19 PERSONS with knowledge of any of the foregoing.
- 20 5. With respect to a fact, means to (i) describe the fact; (ii) state when it became known
21 to YOU or YOUR AGENTS; (iii) identify the source from which YOU or YOUR
22 AGENTS learned the fact; and (iv) identify the DOCUMENTS that record, show or
23 refer to the fact.

24 13. FINANCIAL AND SALES DATA means data related to the sales of products or services
25 by YOU or on YOUR behalf, including but not limited to sales quantities, retail prices, wholesale
26 prices, gross revenues, and net revenues (accounting for returns and other costs). For the avoidance
of doubt, revenues include, but are not limited to, gross revenues, net revenues (accounting for

returns, discounts, and allowances), retail sales, wholesale sales, sales of physical and digital magazines, licensing revenue, and affiliate revenue for physical and digital media, including but not limited to physical books, eBooks and eEditions, audiobooks, course readers, custom course packs, and learning materials. As used in this definition, “costs” include, but are not limited to, costs of goods sold (COGS), unit production costs, royalty expenses, author advances, eBook conversion/hosting costs, spoilage, fulfillment costs, author freight, and marketing expenses for physical and digital media, including but not limited to physical books, eBooks and eEditions, audiobooks, course readers, custom course packs, and learning materials.

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; the word “each” includes “every” 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 Interrogatories any DOCUMENTS or information that might otherwise be construed to be outside their scope.

2. Any terms not specifically defined shall be given their ordinary meaning as YOU understand them to be used in the trade.

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

4. YOU are requested to answer each Interrogatory set forth below separately and completely in writing under oath. YOUR response hereto is to be signed and verified by the PERSON making it, and the objections signed by the attorney making them, as required by Federal Rule of Civil Procedure 33(b).

5. Each Interrogatory shall be answered fully unless it is objected to in good faith, in which event the reasons for YOUR objection shall be stated in detail. If an objection pertains to only a portion of an Interrogatory, or a word, phrase or clause contained within it, YOU are required to

1 state YOUR objection to that portion only and to respond to the remainder of the Interrogatory,
2 using YOUR best efforts to do so. If YOU object based on a purported ambiguity in construing an
3 Interrogatory, or a word, phrase, or clause contained within it, or an Instruction or Definition, such
4 objection shall not serve as a basis for refusing to answer; YOU must set forth in YOUR answer
5 the allegedly ambiguous language and the construction chosen or used to provide a complete
6 response.

7 6. If YOU assert that any information responsive to any Interrogatory is privileged or
8 otherwise protected from discovery, YOU are requested to comply with the requirements of Federal
9 Rule of Civil Procedure 26(b)(5) as to each DOCUMENT, thing, COMMUNICATION or piece of
10 information for which a claim of privilege or protection from discovery is made. For any
11 information withheld on the ground that it is privileged or otherwise protected from discovery,
12 identify the information or DOCUMENT, describe its subject matter and date, identify all authors
13 and all recipients (including copied and blind copied recipients), and specify the basis for the
14 claimed privilege or other grounds of exclusion.

15 7. If YOU answer any of the Interrogatories by reference to records from which the answer
16 may be derived or ascertained, YOU are required to comply with the requirements of Federal Rule
17 of Civil Procedure 33. YOU are requested to comply with the Instructions set forth in Defendants'
18 document requests with respect to any such records produced.

19 8. If and to the extent that YOU object to all or any part of an Interrogatory, or otherwise are
20 unable to respond to any Interrogatory after exercising due diligence, in whole or in part, for any
21 reason other than a claim of privilege, state the reasons for such objection or inability to respond.
22 If YOU object to or are otherwise unable to respond to any part of an Interrogatory, please provide
23 all information responsive to the remainder.

24 9. If an Interrogatory is silent as to the time period for which information is sought, YOUR
25 response should include all information known to you CONCERNING events that occurred, in
26 whole or in part, at any time during the period of 2015 to the present, and CONCERNING activities
in the United States.

1
2 10. These Interrogatories are continuing in nature and YOUR responses to them are to be
3 promptly supplemented or amended if, after the time of YOUR initial responses, YOU learn that
4 any response is or has become in some material respect incomplete or incorrect, pursuant to Federal
5 Rule of Civil Procedure 26(e).

6 **INTERROGATORIES**

7 **INTERROGATORY NO. 19**

8 DESCRIBE, on a work-by-work basis for each month from date of first publication through
9 present, FINANCIAL AND SALES DATA for: (i) each physical book sold by YOU or on YOUR
10 behalf through each channel of distribution YOU use to sell physical books; (ii) each eBook sold
11 by YOU or on YOUR behalf through each channel of distribution YOU use to sell eBooks; (iii)
12 each audiobook sold by YOU or on YOUR behalf through each channel of distribution YOU use
13 to sell audiobooks; and (iv) any other category of physical or digital works published by YOU or
14 on YOUR behalf through each channel of distribution YOU use to sell such works. For the
15 avoidance of doubt, this Interrogatory is not limited to YOUR ASSERTED WORKS.

16 **INTERROGATORY NO. 20**

17 IDENTIFY the number of books, including title of such books and any other associated
18 book identifiers (such as ISBN-10, ISBN-13 or EAN), published by YOU or on YOUR behalf by
19 month, beginning from the earliest month and year of publication of a work as to which you are
20 asserting a claim in this case to the present.
21
22
23
24
25
26

1 Dated: July 31, 2026

2
3 By:/s/ Jessica E. Phillips

4 DUNN ISAACSON RHEE LLP
5 KAREN L. DUNN (*pro hac vice*)
6 (kdunn@dirllp.com)
7 JESSICA E. PHILLIPS (*pro hac vice*)
8 (jphillips@dirllp.com)
9 KYLE N. SMITH (*pro hac vice*)
10 (ksmith@dirllp.com)
11 401 9th Street NW
12 Washington, DC 20004
13 Telephone: (202) 240-2900

14 COOLEY LLP
15 MARK R. WEINSTEIN (SBN 193043)
16 (mweinstein@cooley.com)
17 3175 Hanover Street
18 Palo Alto, CA 94304-1130
19 Telephone: (650) 843-5000
20 Facsimile: (650) 849-7400
21 PHILLIP E. MORTON (*pro hac vice*)
22 1299 Pennsylvania Avenue, NW, Suite 700
23 Washington, DC 20004
24 Telephone: (202) 842-7800

25 CLEARY GOTTlieb STEEN & HAMILTON LLP
26 ANGELA L. DUNNING (SBN 212047)
(adunning@cgsh.com)
151 University Ave
Palo Alto, CA 94301
Telephone: (650) 815-4131

Attorneys for Defendant
Meta Platforms, Inc.

PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of Virginia. I am employed in Washington, D.C. I am over the age of eighteen years, and not a party to the within action. My business address is Dunn Isaacson Rhee LLP, 401 9th Street NW, Washington D.C. 20004. On the date set forth below I served the documents described below in the manner described below:

- **DEFENDANT META PLATFORMS, INC.'S THIRD SET OF INTERROGATORIES TO PLAINTIFF COGNELLA, INC.**

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

on the following part(ies) in this action:

STRIS & MAHER LLP
 Elizabeth Brannen (SBN 226234)
 ebrannen@stris.com
 John Stokes (SBN 310847)
 jstokes@stris.com
 Lauren Martin (SBN 294367)
 lmartin@stris.com
 17785 Center Court Dr N, Ste 600
 Cerritos, CA 90703
 T: (213) 995-6800
 F: (213) 261-0299

Christopher M. Rigali (*pro hac vice*)
 crigali@stris.com
 Jacqueline Sahlberg (*pro hac vice*)
 jsahlberg@stris.com
 1717 K St NW Ste 900
 Washington, DC 20006
 T: (202) 800-5749

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

/s/ Kyle N. Smith

Kyle N. Smith

DUNN ISAACSON RHEE LLP
KAREN L. DUNN (*pro hac vice*)
(kdunn@dirllp.com)
JESSICA E. PHILLIPS (*pro hac vice*)
(jphillips@dirllp.com)
KYLE N. SMITH (*pro hac vice*)
(ksmith@dirllp.com)
401 9th Street NW
Washington, DC 20004
Telephone: (202) 240-2900

CLEARY GOTTlieb STEEN &
HAMILTON LLP
ANGELA L. DUNNING (212047)
adunning@cgsh.com
151 University Ave
Palo Alto, CA 94301
Telephone: (650) 815-4131

COOLEY LLP
MARK R. WEINSTEIN (193043)
mweinstein@cooley.com
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
PHILLIP E. MORTON (*pro hac vice*)
pmorton@cooley.com
1299 Pennsylvania Avenue NW, Suite 700
Washington, DC 20004
Telephone: (202) 842-7800

Attorneys for Defendant *Meta Platforms, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHICKEN SOUP FOR THE SOUL, LLC,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S SECOND SET OF
INTERROGATORIES TO PLAINTIFF
CHICKEN SOUP FOR THE SOUL, LLC**

Trial Date: None

Date Action Filed: March 17, 2026

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF CHICKEN SOUP FOR THE SOUL, LLC

Set Number: TWO (2)

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Plaintiff Chicken Soup For The Soul, LLC (“Chicken Soup” or “Plaintiff”) answer completely and in writing under oath within (30) days of service hereof each of the interrogatories set forth below (“Interrogatories”).

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 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. AGENT means any current or former agent, representative, employee, attorney, or other PERSON acting for YOU or on YOUR behalf with YOUR knowledge or authorization (express or implied).

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

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

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

6. 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.

1
2 7. THIRD PARTY means all PERSONS other than the named Parties to this ACTION.

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

7 9. DOCUMENT(S) means the original and all non-identical copies (including drafts and those
8 with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as defined in
9 Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil Procedure
10 34, and includes papers of all kinds and electronically stored information, including by way of
11 example and without limitation, electronic mail, letters, communications, memoranda, notes,
12 computer generated data, calendars, records, minutes, studies, reports, notebooks, messages,
13 telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written
14 notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data,
15 source code, data compilation, pictures, photographs, books, pamphlets, publications,
16 advertisements, sales literature, brochures, manuals, price lists, announcements, and any other
17 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.

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

23 11. DESCRIBE means to provide a detailed narrative statement or description of the specific
24 facts or matters to which an Interrogatory refers, including, but not limited to, an identification of
25 all PERSONS, COMMUNICATIONS, acts, transactions, events, agreements, recommendations,
26

1 and DOCUMENTS used, necessary, or desirable to support such statement or make the description
2 complete.

3 12. IDENTIFY (and variations thereof) means the following:

- 4 1. With respect to a natural person, provide the person's: (i) full name; (ii) current or
5 last known home address; (iii) current or last known business address; (iv) current
6 or last known email address; (v) current or last known occupation, employer and
7 business position or title; and (vi) current or last known telephone number.
- 8 2. With respect to an entity which is not a natural person, provide: (i) the full name of
9 the entity; (ii) the type of entity (e.g., corporation, partnership, sole proprietorship,
10 association); (iii) the name, address and telephone number of its principal place of
11 business; (iv) all names under which it is doing, or has ever done, business; (v) the
12 name(s) of the contact person(s); and (vi) the date or interval when such entity stood
in the capacity referenced by the interrogatory.
- 13 3. With respect to an event or action, (i) provide the date of the event or action; (ii)
14 state the person(s) present or involved; (iii) state the place or places where the event
15 or action took place.
- 16 4. With respect to a DOCUMENT, (i) state the originator, author, addressee, recipient;
17 (ii) describe the contents; (iii) state the date of the document; and (iv) identify all
PERSONS with knowledge of any of the foregoing.
- 18 5. With respect to a fact, means to (i) describe the fact; (ii) state when it became known
19 to YOU or YOUR AGENTS; (iii) identify the source from which YOU or YOUR
20 AGENTS learned the fact; and (iv) identify the DOCUMENTS that record, show or
21 refer to the fact.

22 13. FINANCIAL AND SALES DATA means data related to the sales of products or services
23 by YOU or on YOUR behalf, including but not limited to sales quantities, retail prices, wholesale
24 prices, gross revenues, and net revenues (accounting for returns and other costs). For the avoidance
25 of doubt, revenues include, but are not limited to, gross revenues, net revenues (accounting for
26

1 returns, discounts, and allowances), retail sales, wholesale sales, sales of physical and digital
2 magazines, licensing revenue, and affiliate revenue for physical and digital media, including but
3 not limited to physical books, eBooks and eEditions, and audiobooks. As used in this definition,
4 “costs” include, but are not limited to, costs of goods sold (COGS), unit production costs, royalty
5 expenses, author advances, eBook conversion/hosting costs, spoilage, fulfillment costs, author
6 freight, and marketing expenses for physical and digital media, including but not limited to physical
7 books, eBooks and eEditions, and audiobooks.

8 INSTRUCTIONS

9
10 1. Wherever used herein: the singular shall include the plural and vice versa; verb tenses shall
11 be interpreted to include past, present, and future tenses; the word “all” includes the word “any”
12 and vice versa; the word “each” includes “every” and vice versa; and the terms “and” and “or” shall
13 be construed either disjunctively or conjunctively as necessary to bring within the scope of these
14 Interrogatories any DOCUMENTS or information that might otherwise be construed to be outside
15 their scope.

16 2. Any terms not specifically defined shall be given their ordinary meaning as YOU
17 understand them to be used in the trade.

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

20 4. YOU are requested to answer each Interrogatory set forth below separately and completely
21 in writing under oath. YOUR response hereto is to be signed and verified by the PERSON making
22 it, and the objections signed by the attorney making them, as required by Federal Rule of Civil
23 Procedure 33(b).

24 5. Each Interrogatory shall be answered fully unless it is objected to in good faith, in which
25 event the reasons for YOUR objection shall be stated in detail. If an objection pertains to only a
26 portion of an Interrogatory, or a word, phrase or clause contained within it, YOU are required to
state YOUR objection to that portion only and to respond to the remainder of the Interrogatory,

1 using YOUR best efforts to do so. If YOU object based on a purported ambiguity in construing an
2 Interrogatory, or a word, phrase, or clause contained within it, or an Instruction or Definition, such
3 objection shall not serve as a basis for refusing to answer; YOU must set forth in YOUR answer
4 the allegedly ambiguous language and the construction chosen or used to provide a complete
5 response.

6 6. If YOU assert that any information responsive to any Interrogatory is privileged or
7 otherwise protected from discovery, YOU are requested to comply with the requirements of Federal
8 Rule of Civil Procedure 26(b)(5) as to each DOCUMENT, thing, COMMUNICATION or piece of
9 information for which a claim of privilege or protection from discovery is made. For any
10 information withheld on the ground that it is privileged or otherwise protected from discovery,
11 identify the information or DOCUMENT, describe its subject matter and date, identify all authors
12 and all recipients (including copied and blind copied recipients), and specify the basis for the
claimed privilege or other grounds of exclusion.

13 7. If YOU answer any of the Interrogatories by reference to records from which the answer
14 may be derived or ascertained, YOU are required to comply with the requirements of Federal Rule
15 of Civil Procedure 33. YOU are requested to comply with the Instructions set forth in Defendants'
16 document requests with respect to any such records produced.

17 8. If and to the extent that YOU object to all or any part of an Interrogatory, or otherwise are
18 unable to respond to any Interrogatory after exercising due diligence, in whole or in part, for any
19 reason other than a claim of privilege, state the reasons for such objection or inability to respond.
20 If YOU object to or are otherwise unable to respond to any part of an Interrogatory, please provide
all information responsive to the remainder.

21 9. If an Interrogatory is silent as to the time period for which information is sought, YOUR
22 response should include all information known to you CONCERNING events that occurred, in
23 whole or in part, at any time during the period of 2015 to the present, and CONCERNING activities
24 in the United States.

1
2 10. These Interrogatories are continuing in nature and YOUR responses to them are to be
3 promptly supplemented or amended if, after the time of YOUR initial responses, YOU learn that
4 any response is or has become in some material respect incomplete or incorrect, pursuant to Federal
5 Rule of Civil Procedure 26(e).

6 **INTERROGATORIES**

7 **INTERROGATORY NO. 15**

8 DESCRIBE, on a work-by-work basis for each month from date of first publication through
9 present, FINANCIAL AND SALES DATA for: (i) each physical book sold by YOU or on YOUR
10 behalf through each channel of distribution YOU use to sell physical books; (ii) each eBook sold
11 by YOU or on YOUR behalf through each channel of distribution YOU use to sell eBooks; (iii)
12 each audiobook sold by YOU or on YOUR behalf through each channel of distribution YOU use
13 to sell audiobooks; and (iv) any other category of physical or digital works published by YOU or
14 on YOUR behalf through each channel of distribution YOU use to sell such works. For the
15 avoidance of doubt, this Interrogatory is not limited to YOUR ASSERTED WORKS.

16 **INTERROGATORY NO. 16**

17 IDENTIFY the number of books, including title of such books and any other associated
18 book identifiers (such as ISBN-10, ISBN-13 or EAN), published by YOU or on YOUR behalf by
19 month, beginning from the earliest month and year of publication of a work as to which you are
20 asserting a claim in this case to the present.
21
22
23
24
25
26

1 Dated: July 31, 2026

2
3 By:/s/ Jessica E. Phillips

4 DUNN ISAACSON RHEE LLP
5 KAREN L. DUNN (*pro hac vice*)
6 (kdunn@dirllp.com)
7 JESSICA E. PHILLIPS (*pro hac vice*)
8 (jphillips@dirllp.com)
9 KYLE N. SMITH (*pro hac vice*)
10 (ksmith@dirllp.com)
11 401 9th Street NW
12 Washington, DC 20004
13 Telephone: (202) 240-2900

14 COOLEY LLP
15 MARK R. WEINSTEIN (SBN 193043)
16 (mweinstein@cooley.com)
17 3175 Hanover Street
18 Palo Alto, CA 94304-1130
19 Telephone: (650) 843-5000
20 Facsimile: (650) 849-7400
21 PHILLIP E. MORTON (*pro hac vice*)
22 1299 Pennsylvania Avenue, NW, Suite 700
23 Washington, DC 20004
24 Telephone: (202) 842-7800

25 CLEARY GOTTlieb STEEN & HAMILTON LLP
26 ANGELA L. DUNNING (SBN 212047)
(adunning@cgsh.com)
151 University Ave
Palo Alto, CA 94301
Telephone: (650) 815-4131

Attorneys for Defendant
Meta Platforms, Inc.

PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of Virginia. I am employed in Washington, D.C. I am over the age of eighteen years, and not a party to the within action. My business address is Dunn Isaacson Rhee LLP, 401 9th Street NW, Washington D.C. 20004. On the date set forth below I served the documents described below in the manner described below:

- **DEFENDANT META PLATFORMS, INC.'S THIRD SET OF INTERROGATORIES TO PLAINTIFF CHICKEN SOUP FOR THE SOUL, LLC**

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

on the following part(ies) in this action:

STRIS & MAHER LLP
Elizabeth Brannen (SBN 226234)
ebrannen@stris.com
John Stokes (SBN 310847)
jstokes@stris.com
Lauren Martin (SBN 294367)
lmartin@stris.com
17785 Center Court Dr N, Ste 600
Cerritos, CA 90703
T: (213) 995-6800
F: (213) 261-0299

Christopher M. Rigali (*pro hac vice*)
crigali@stris.com
Jacqueline Sahlberg (*pro hac vice*)
jsahlberg@stris.com
1717 K St NW Ste 900
Washington, DC 20006
T: (202) 800-5749

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

/s/ Kyle N. Smith

Kyle N. Smith

DUNN ISAACSON RHEE LLP
KAREN L. DUNN (*pro hac vice*)
(kdunn@dirllp.com)
JESSICA E. PHILLIPS (*pro hac vice*)
(jphillips@dirllp.com)
KYLE N. SMITH (*pro hac vice*)
(ksmith@dirllp.com)
401 9th Street NW
Washington, DC 20004
Telephone: (202) 240-2900

CLEARY GOTTlieb STEEN &
HAMILTON LLP
ANGELA L. DUNNING (212047)
adunning@cgsh.com
151 University Ave
Palo Alto, CA 94301
Telephone: (650) 815-4131

COOLEY LLP
BOBBY A. GHAJAR (198719)
bghajar@cooley.com
1333 2nd Street, Suite 400
Santa Monica, CA 90401
Telephone: (310) 883-6400
KATHLEEN R. HARTNETT (314267)
khartnett@cooley.com
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Telephone: (415) 693-2071
MARK R. WEINSTEIN (193043)
mweinstein@cooley.com
ELIZABETH L. STAMESHKIN (260865)
lstameshkin@cooley.com
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
PHILLIP E. MORTON (*pro hac vice*)
pmorton@cooley.com
1299 Pennsylvania Avenue NW, Suite 700
Washington, DC 20004
Telephone: (202) 842-7800

Attorneys for Defendant *Meta Platforms, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC. ET AL.,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S SECOND SET OF
INTERROGATORIES TO PLAINTIFF
JANE ADAMS**

Trial Date: None
Date Action Filed: December 22, 2025

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF JANE ADAMS

Set Number: TWO (2)

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Plaintiff Jane Adams (“Jane Adams” or “Plaintiff”) answer completely and in writing under oath within (30) days of service hereof each of the interrogatories set forth below (“Interrogatories”).

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 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. AGENT means any current or former agent, representative, employee, attorney, or other PERSON acting for YOU or on YOUR behalf with YOUR knowledge or authorization (express or implied).

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

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

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

6. 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.

1
2 7. THIRD PARTY means all PERSONS other than the named Parties to this ACTION.

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

7 9. DOCUMENT(S) means the original and all non-identical copies (including drafts and those
8 with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as defined in
9 Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil Procedure
10 34, and includes papers of all kinds and electronically stored information, including by way of
11 example and without limitation, electronic mail, letters, communications, memoranda, notes,
12 computer generated data, calendars, records, minutes, studies, reports, notebooks, messages,
13 telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written
14 notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data,
15 source code, data compilation, pictures, photographs, books, pamphlets, publications,
16 advertisements, sales literature, brochures, manuals, price lists, announcements, and any other
17 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.

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

23 11. DESCRIBE means to provide a detailed narrative statement or description of the specific
24 facts or matters to which an Interrogatory refers, including, but not limited to, an identification of
25 all PERSONS, COMMUNICATIONS, acts, transactions, events, agreements, recommendations,
26

and DOCUMENTS used, necessary, or desirable to support such statement or make the description complete.

12. IDENTIFY (and variations thereof) means the following:

1. With respect to a natural person, provide the person's: (i) full name; (ii) current or last known home address; (iii) current or last known business address; (iv) current or last known email address; (v) current or last known occupation, employer and business position or title; and (vi) current or last known telephone number.
2. With respect to an entity which is not a natural person, provide: (i) the full name of the entity; (ii) the type of entity (e.g., corporation, partnership, sole proprietorship, association); (iii) the name, address and telephone number of its principal place of business; (iv) all names under which it is doing, or has ever done, business; (v) the name(s) of the contact person(s); and (vi) the date or interval when such entity stood in the capacity referenced by the interrogatory.
3. With respect to an event or action, (i) provide the date of the event or action; (ii) state the person(s) present or involved; (iii) state the place or places where the event or action took place.
4. With respect to a DOCUMENT, (i) state the originator, author, addressee, recipient; (ii) describe the contents; (iii) state the date of the document; and (iv) identify all PERSONS with knowledge of any of the foregoing.
5. With respect to a fact, means to (i) describe the fact; (ii) state when it became known to YOU or YOUR AGENTS; (iii) identify the source from which YOU or YOUR AGENTS learned the fact; and (iv) identify the DOCUMENTS that record, show or refer to the fact.

13. FINANCIAL AND SALES DATA means data related to the sales of products or services by YOU or on YOUR behalf, including but not limited to sales quantities, retail prices, wholesale prices, gross revenues, and net revenues (accounting for returns and other costs). For the avoidance of doubt, revenues include, but are not limited to, gross revenues, net revenues (accounting for

1 returns, discounts, and allowances), retail sales, wholesale sales, sales of physical and digital
2 magazines, licensing revenue, and affiliate revenue for physical and digital media, including but
3 not limited to physical books, eBooks and eEditions, and audiobooks. As used in this definition,
4 “costs” include, but are not limited to, costs of goods sold (COGS), unit production costs, royalty
5 expenses, author advances, eBook conversion/hosting costs, spoilage, fulfillment costs, author
6 freight, and marketing expenses for physical and digital media, including but not limited to physical
7 books, eBooks and eEditions, and audiobooks.

8 **INSTRUCTIONS**

9
10 1. Wherever used herein: the singular shall include the plural and vice versa; verb tenses shall
11 be interpreted to include past, present, and future tenses; the word “all” includes the word “any”
12 and vice versa; the word “each” includes “every” and vice versa; and the terms “and” and “or” shall
13 be construed either disjunctively or conjunctively as necessary to bring within the scope of these
14 Interrogatories any DOCUMENTS or information that might otherwise be construed to be outside
15 their scope.

16 2. Any terms not specifically defined shall be given their ordinary meaning as YOU
17 understand them to be used in the trade.

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

20 4. YOU are requested to answer each Interrogatory set forth below separately and completely
21 in writing under oath. YOUR response hereto is to be signed and verified by the PERSON making
22 it, and the objections signed by the attorney making them, as required by Federal Rule of Civil
23 Procedure 33(b).

24 5. Each Interrogatory shall be answered fully unless it is objected to in good faith, in which
25 event the reasons for YOUR objection shall be stated in detail. If an objection pertains to only a
26 portion of an Interrogatory, or a word, phrase or clause contained within it, YOU are required to
state YOUR objection to that portion only and to respond to the remainder of the Interrogatory,

1 using YOUR best efforts to do so. If YOU object based on a purported ambiguity in construing an
2 Interrogatory, or a word, phrase, or clause contained within it, or an Instruction or Definition, such
3 objection shall not serve as a basis for refusing to answer; YOU must set forth in YOUR answer
4 the allegedly ambiguous language and the construction chosen or used to provide a complete
5 response.

6 6. If YOU assert that any information responsive to any Interrogatory is privileged or
7 otherwise protected from discovery, YOU are requested to comply with the requirements of Federal
8 Rule of Civil Procedure 26(b)(5) as to each DOCUMENT, thing, COMMUNICATION or piece of
9 information for which a claim of privilege or protection from discovery is made. For any
10 information withheld on the ground that it is privileged or otherwise protected from discovery,
11 identify the information or DOCUMENT, describe its subject matter and date, identify all authors
12 and all recipients (including copied and blind copied recipients), and specify the basis for the
claimed privilege or other grounds of exclusion.

13 7. If YOU answer any of the Interrogatories by reference to records from which the answer
14 may be derived or ascertained, YOU are required to comply with the requirements of Federal Rule
15 of Civil Procedure 33. YOU are requested to comply with the Instructions set forth in Defendants'
16 document requests with respect to any such records produced.

17 8. If and to the extent that YOU object to all or any part of an Interrogatory, or otherwise are
18 unable to respond to any Interrogatory after exercising due diligence, in whole or in part, for any
19 reason other than a claim of privilege, state the reasons for such objection or inability to respond.
20 If YOU object to or are otherwise unable to respond to any part of an Interrogatory, please provide
all information responsive to the remainder.

21 9. If an Interrogatory is silent as to the time period for which information is sought, YOUR
22 response should include all information known to you CONCERNING events that occurred, in
23 whole or in part, at any time during the period of 2015 to the present, and CONCERNING activities
24 in the United States.

1
2 10. These Interrogatories are continuing in nature and YOUR responses to them are to be
3 promptly supplemented or amended if, after the time of YOUR initial responses, YOU learn that
4 any response is or has become in some material respect incomplete or incorrect, pursuant to Federal
5 Rule of Civil Procedure 26(e).

6 **INTERROGATORIES**

7 **INTERROGATORY NO. 15**

8 DESCRIBE, on a work-by-work basis for each month from date of first publication through
9 present, FINANCIAL AND SALES DATA for: (i) each physical book sold by YOU or on YOUR
10 behalf through each channel of distribution YOU use to sell physical books; (ii) each eBook sold
11 by YOU or on YOUR behalf through each channel of distribution YOU use to sell eBooks; (iii)
12 each audiobook sold by YOU or on YOUR behalf through each channel of distribution YOU use
13 to sell audiobooks; and (iv) any other category of physical or digital works published by YOU or
14 on YOUR behalf through each channel of distribution YOU use to sell such works. For the
15 avoidance of doubt, this Interrogatory is not limited to YOUR ASSERTED WORKS.

16 **INTERROGATORY NO. 16**

17 IDENTIFY the number of books, including title of such books and any other associated
18 book identifiers (such as ISBN-10, ISBN-13 or EAN), published by YOU or on YOUR behalf by
19 month, beginning from the earliest month and year of publication of a work as to which you are
20 asserting a claim in this case to the present.
21
22
23
24
25
26

1 Dated: July 31, 2026

2
3 By:/s/ Jessica E. Phillips

4 DUNN ISAACSON RHEE LLP
5 KAREN L. DUNN (*pro hac vice*)
6 (kdunn@dirllp.com)
7 JESSICA E. PHILLIPS (*pro hac vice*)
8 (jphillips@dirllp.com)
9 KYLE N. SMITH (*pro hac vice*)
10 (ksmith@dirllp.com)
11 401 9th Street NW
12 Washington, DC 20004
13 Telephone: (202) 240-2900

14 COOLEY LLP
15 BOBBY GHAJAR (SBN 198719)
16 (bghajar@cooley.com)
17 1333 2nd Street, Suite 400
18 Santa Monica, CA 90401
19 Telephone: (310) 883-6400
20 Facsimile: (310) 883-6500
21 KATHLEEN R. HARTNETT (SBN 314267)
22 (khartnett@cooley.com)
23 3 Embarcadero Center, 20th Floor
24 San Francisco, CA 94111-4004
25 Telephone: (415) 693-2071
26 Facsimile: (415) 693-2222
MARK R. WEINSTEIN (SBN 193043)
(mweinstein@cooley.com)
ELIZABETH L. STAMESHKIN (SBN 260865)
(lstameshkin@cooley.com)
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
Facsimile: (650) 849-7400
PHILLIP E. MORTON (*pro hac vice*)
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004
Telephone: (202) 842-7800

CLEARY GOTTlieb STEEN & HAMILTON LLP
ANGELA L. DUNNING (SBN 212047)
(adunning@cgsh.com)
151 University Ave
Palo Alto, CA 94301
Telephone: (650) 815-4131

Attorneys for Defendant
Meta Platforms, Inc.

PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of Virginia. I am employed in Washington, D.C. I am over the age of eighteen years, and not a party to the within action. My business address is Dunn Isaacson Rhee LLP, 401 9th Street NW, Washington D.C. 20004. On the date set forth below I served the documents described below in the manner described below:

- **DEFENDANT META PLATFORMS, INC.'S THIRD SET OF INTERROGATORIES TO PLAINTIFF CAMBRONNE INC.**

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

on the following part(ies) in this action:

STRIS & MAHER LLP
Elizabeth Brannen (SBN 226234)
ebrannen@stris.com
John Stokes (SBN 310847)
jstokes@stris.com
Lauren Martin (SBN 294367)
lmartin@stris.com
17785 Center Court Dr N, Ste 600
Cerritos, CA 90703
T: (213) 995-6800
F: (213) 261-0299

FREEDMAN NORMAND FRIEDLAND LLP
Devin (Velvel) Freedman (*pro hac vice* forthcoming)
vel@fnf.law
Kyle Roche (*pro hac vice* forthcoming)
kroche@fnf.law
Alex Potter (*pro hac vice* forthcoming)
apotter@fnf.law
155 E. 44th Street, Ste 915
New York, NY 10017
T: (646) 494-2900

Christopher M. Rigali (*pro hac vice*)
crigali@stris.com
Jacqueline Sahlberg (*pro hac vice*)
jsahlberg@stris.com
1717 K St NW Ste 900
Washington, DC 20006
T: (202) 800-5749

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

/s/ Kyle N. Smith

Kyle N. Smith

DUNN ISAACSON RHEE LLP
 KAREN L. DUNN (*pro hac vice*)
 (kdunn@dirllp.com)
 JESSICA E. PHILLIPS (*pro hac vice*)
 (jphillips@dirllp.com)
 KYLE N. SMITH (*pro hac vice*)
 (ksmith@dirllp.com)
 401 9th Street NW
 Washington, DC 20004
 Telephone: (202) 240-2900

CLEARY GOTTlieb STEEN &
 HAMILTON LLP
 ANGELA L. DUNNING (212047)
 adunning@cgsh.com
 151 University Ave
 Palo Alto, CA 94301
 Telephone: (650) 815-4131

COOLEY LLP
 BOBBY A. GHAJAR (198719)
 bghajar@cooley.com
 1333 2nd Street, Suite 400
 Santa Monica, CA 90401
 Telephone: (310) 883-6400
 KATHLEEN R. HARTNETT (314267)
 khartnett@cooley.com
 3 Embarcadero Center, 20th Floor
 San Francisco, CA 94111-4004
 Telephone: (415) 693-2071
 MARK R. WEINSTEIN (193043)
 mweinstein@cooley.com
 ELIZABETH L. STAMESHKIN (260865)
 lstameshkin@cooley.com
 3175 Hanover Street
 Palo Alto, CA 94304-1130
 Telephone: (650) 843-5000
 PHILLIP E. MORTON (*pro hac vice*)
 pmorton@cooley.com
 1299 Pennsylvania Avenue NW, Suite 700
 Washington, DC 20004
 Telephone: (202) 842-7800

Attorneys for Defendant *Meta Platforms, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC. ET AL.,

 Plaintiffs,

 v.

 META PLATFORMS, INC.,

 Defendant.

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

**DEFENDANT META PLATFORMS,
 INC.'S SECOND SET OF
 INTERROGATORIES TO PLAINTIFF
 LISA BARRETTA**

Trial Date: None
 Date Action Filed: December 22, 2025

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF LISA BARRETTA

Set Number: TWO (2)

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Plaintiff Lisa Barretta (“Lisa Barretta” or “Plaintiff”) answer completely and in writing under oath within (30) days of service hereof each of the interrogatories set forth below (“Interrogatories”).

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 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. AGENT means any current or former agent, representative, employee, attorney, or other PERSON acting for YOU or on YOUR behalf with YOUR knowledge or authorization (express or implied).

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

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

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

6. 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.

1
2 7. THIRD PARTY means all PERSONS other than the named Parties to this ACTION.

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

7 9. DOCUMENT(S) means the original and all non-identical copies (including drafts and those
8 with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as defined in
9 Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil Procedure
10 34, and includes papers of all kinds and electronically stored information, including by way of
11 example and without limitation, electronic mail, letters, communications, memoranda, notes,
12 computer generated data, calendars, records, minutes, studies, reports, notebooks, messages,
13 telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written
14 notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data,
15 source code, data compilation, pictures, photographs, books, pamphlets, publications,
16 advertisements, sales literature, brochures, manuals, price lists, announcements, and any other
17 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.

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

23 11. DESCRIBE means to provide a detailed narrative statement or description of the specific
24 facts or matters to which an Interrogatory refers, including, but not limited to, an identification of
25 all PERSONS, COMMUNICATIONS, acts, transactions, events, agreements, recommendations,
26

1 and DOCUMENTS used, necessary, or desirable to support such statement or make the description
2 complete.

3 12. IDENTIFY (and variations thereof) means the following:

- 4 1. With respect to a natural person, provide the person's: (i) full name; (ii) current or
5 last known home address; (iii) current or last known business address; (iv) current
6 or last known email address; (v) current or last known occupation, employer and
7 business position or title; and (vi) current or last known telephone number.
- 8 2. With respect to an entity which is not a natural person, provide: (i) the full name of
9 the entity; (ii) the type of entity (e.g., corporation, partnership, sole proprietorship,
10 association); (iii) the name, address and telephone number of its principal place of
11 business; (iv) all names under which it is doing, or has ever done, business; (v) the
12 name(s) of the contact person(s); and (vi) the date or interval when such entity stood
in the capacity referenced by the interrogatory.
- 13 3. With respect to an event or action, (i) provide the date of the event or action; (ii)
14 state the person(s) present or involved; (iii) state the place or places where the event
15 or action took place.
- 16 4. With respect to a DOCUMENT, (i) state the originator, author, addressee, recipient;
17 (ii) describe the contents; (iii) state the date of the document; and (iv) identify all
PERSONS with knowledge of any of the foregoing.
- 18 5. With respect to a fact, means to (i) describe the fact; (ii) state when it became known
19 to YOU or YOUR AGENTS; (iii) identify the source from which YOU or YOUR
20 AGENTS learned the fact; and (iv) identify the DOCUMENTS that record, show or
21 refer to the fact.

22 13. FINANCIAL AND SALES DATA means data related to the sales of products or services
23 by YOU or on YOUR behalf, including but not limited to sales quantities, retail prices, wholesale
24 prices, gross revenues, and net revenues (accounting for returns and other costs). For the avoidance
25 of doubt, revenues include, but are not limited to, gross revenues, net revenues (accounting for
26

1 returns, discounts, and allowances), retail sales, wholesale sales, sales of physical and digital
2 magazines, licensing revenue, and affiliate revenue for physical and digital media, including but
3 not limited to physical books, eBooks and eEditions, and audiobooks. As used in this definition,
4 “costs” include, but are not limited to, costs of goods sold (COGS), unit production costs, royalty
5 expenses, author advances, eBook conversion/hosting costs, spoilage, fulfillment costs, author
6 freight, and marketing expenses for physical and digital media, including but not limited to physical
7 books, eBooks and eEditions, and audiobooks.

8 **INSTRUCTIONS**

9
10 1. Wherever used herein: the singular shall include the plural and vice versa; verb tenses shall
11 be interpreted to include past, present, and future tenses; the word “all” includes the word “any”
12 and vice versa; the word “each” includes “every” and vice versa; and the terms “and” and “or” shall
13 be construed either disjunctively or conjunctively as necessary to bring within the scope of these
14 Interrogatories any DOCUMENTS or information that might otherwise be construed to be outside
15 their scope.

16 2. Any terms not specifically defined shall be given their ordinary meaning as YOU
17 understand them to be used in the trade.

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

20 4. YOU are requested to answer each Interrogatory set forth below separately and completely
21 in writing under oath. YOUR response hereto is to be signed and verified by the PERSON making
22 it, and the objections signed by the attorney making them, as required by Federal Rule of Civil
23 Procedure 33(b).

24 5. Each Interrogatory shall be answered fully unless it is objected to in good faith, in which
25 event the reasons for YOUR objection shall be stated in detail. If an objection pertains to only a
26 portion of an Interrogatory, or a word, phrase or clause contained within it, YOU are required to
state YOUR objection to that portion only and to respond to the remainder of the Interrogatory,

1
2 using YOUR best efforts to do so. If YOU object based on a purported ambiguity in construing an
3 Interrogatory, or a word, phrase, or clause contained within it, or an Instruction or Definition, such
4 objection shall not serve as a basis for refusing to answer; YOU must set forth in YOUR answer
5 the allegedly ambiguous language and the construction chosen or used to provide a complete
6 response.

6 6. If YOU assert that any information responsive to any Interrogatory is privileged or
7 otherwise protected from discovery, YOU are requested to comply with the requirements of Federal
8 Rule of Civil Procedure 26(b)(5) as to each DOCUMENT, thing, COMMUNICATION or piece of
9 information for which a claim of privilege or protection from discovery is made. For any
10 information withheld on the ground that it is privileged or otherwise protected from discovery,
11 identify the information or DOCUMENT, describe its subject matter and date, identify all authors
12 and all recipients (including copied and blind copied recipients), and specify the basis for the
13 claimed privilege or other grounds of exclusion.

13 7. If YOU answer any of the Interrogatories by reference to records from which the answer
14 may be derived or ascertained, YOU are required to comply with the requirements of Federal Rule
15 of Civil Procedure 33. YOU are requested to comply with the Instructions set forth in Defendants'
16 document requests with respect to any such records produced.

16 8. If and to the extent that YOU object to all or any part of an Interrogatory, or otherwise are
17 unable to respond to any Interrogatory after exercising due diligence, in whole or in part, for any
18 reason other than a claim of privilege, state the reasons for such objection or inability to respond.
19 If YOU object to or are otherwise unable to respond to any part of an Interrogatory, please provide
20 all information responsive to the remainder.

21 9. If an Interrogatory is silent as to the time period for which information is sought, YOUR
22 response should include all information known to you CONCERNING events that occurred, in
23 whole or in part, at any time during the period of 2015 to the present, and CONCERNING activities
24 in the United States.

1
2 10. These Interrogatories are continuing in nature and YOUR responses to them are to be
3 promptly supplemented or amended if, after the time of YOUR initial responses, YOU learn that
4 any response is or has become in some material respect incomplete or incorrect, pursuant to Federal
5 Rule of Civil Procedure 26(e).

6 **INTERROGATORIES**

7 **INTERROGATORY NO. 15**

8 DESCRIBE, on a work-by-work basis for each month from date of first publication through
9 present, FINANCIAL AND SALES DATA for: (i) each physical book sold by YOU or on YOUR
10 behalf through each channel of distribution YOU use to sell physical books; (ii) each eBook sold
11 by YOU or on YOUR behalf through each channel of distribution YOU use to sell eBooks; (iii)
12 each audiobook sold by YOU or on YOUR behalf through each channel of distribution YOU use
13 to sell audiobooks; and (iv) any other category of physical or digital works published by YOU or
14 on YOUR behalf through each channel of distribution YOU use to sell such works. For the
15 avoidance of doubt, this Interrogatory is not limited to YOUR ASSERTED WORKS.

16 **INTERROGATORY NO. 16**

17 IDENTIFY the number of books, including title of such books and any other associated
18 book identifiers (such as ISBN-10, ISBN-13 or EAN), published by YOU or on YOUR behalf by
19 month, beginning from the earliest month and year of publication of a work as to which you are
20 asserting a claim in this case to the present.
21
22
23
24
25
26

1 Dated: July 31, 2026

2
3 By:/s/ Jessica E. Phillips

4 DUNN ISAACSON RHEE LLP
5 KAREN L. DUNN (*pro hac vice*)
6 (kdunn@dirllp.com)
7 JESSICA E. PHILLIPS (*pro hac vice*)
8 (jphillips@dirllp.com)
9 KYLE N. SMITH (*pro hac vice*)
10 (ksmith@dirllp.com)
11 401 9th Street NW
12 Washington, DC 20004
13 Telephone: (202) 240-2900

14 COOLEY LLP
15 BOBBY GHAJAR (SBN 198719)
16 (bghajar@cooley.com)
17 1333 2nd Street, Suite 400
18 Santa Monica, CA 90401
19 Telephone: (310) 883-6400
20 Facsimile: (310) 883-6500
21 KATHLEEN R. HARTNETT (SBN 314267)
22 (khartnett@cooley.com)
23 3 Embarcadero Center, 20th Floor
24 San Francisco, CA 94111-4004
25 Telephone: (415) 693-2071
26 Facsimile: (415) 693-2222
MARK R. WEINSTEIN (SBN 193043)
(mweinstein@cooley.com)
ELIZABETH L. STAMESHKIN (SBN 260865)
(lstameshkin@cooley.com)
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
Facsimile: (650) 849-7400
PHILLIP E. MORTON (*pro hac vice*)
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004
Telephone: (202) 842-7800

CLEARY GOTTlieb STEEN & HAMILTON LLP
ANGELA L. DUNNING (SBN 212047)
(adunning@cgsh.com)
151 University Ave
Palo Alto, CA 94301
Telephone: (650) 815-4131

Attorneys for Defendant
Meta Platforms, Inc.

PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of Virginia. I am employed in Washington, D.C. I am over the age of eighteen years, and not a party to the within action. My business address is Dunn Isaacson Rhee LLP, 401 9th Street NW, Washington D.C. 20004. On the date set forth below I served the documents described below in the manner described below:

- **DEFENDANT META PLATFORMS, INC.'S THIRD SET OF INTERROGATORIES TO PLAINTIFF CAMBRONNE INC.**

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

on the following part(ies) in this action:

STRIS & MAHER LLP
Elizabeth Brannen (SBN 226234)
ebrannen@stris.com
John Stokes (SBN 310847)
jstokes@stris.com
Lauren Martin (SBN 294367)
lmartin@stris.com
17785 Center Court Dr N, Ste 600
Cerritos, CA 90703
T: (213) 995-6800
F: (213) 261-0299

FREEDMAN NORMAND FRIEDLAND LLP
Devin (Velvel) Freedman (*pro hac vice* forthcoming)
vel@fnf.law
Kyle Roche (*pro hac vice* forthcoming)
kroche@fnf.law
Alex Potter (*pro hac vice* forthcoming)
apotter@fnf.law
155 E. 44th Street, Ste 915
New York, NY 10017
T: (646) 494-2900

Christopher M. Rigali (*pro hac vice*)
crigali@stris.com
Jacqueline Sahlberg (*pro hac vice*)
jsahlberg@stris.com
1717 K St NW Ste 900
Washington, DC 20006
T: (202) 800-5749

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

/s/ Kyle N. Smith

Kyle N. Smith

DUNN ISAACSON RHEE LLP
KAREN L. DUNN (*pro hac vice*)
(kdunn@dirllp.com)
JESSICA E. PHILLIPS (*pro hac vice*)
(jphillips@dirllp.com)
KYLE N. SMITH (*pro hac vice*)
(ksmith@dirllp.com)
401 9th Street NW
Washington, DC 20004
Telephone: (202) 240-2900

CLEARY GOTTlieb STEEN &
HAMILTON LLP
ANGELA L. DUNNING (212047)
adunning@cgsh.com
151 University Ave
Palo Alto, CA 94301
Telephone: (650) 815-4131

COOLEY LLP
BOBBY A. GHAJAR (198719)
bghajar@cooley.com
1333 2nd Street, Suite 400
Santa Monica, CA 90401
Telephone: (310) 883-6400
KATHLEEN R. HARTNETT (314267)
khartnett@cooley.com
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Telephone: (415) 693-2071
MARK R. WEINSTEIN (193043)
mweinstein@cooley.com
ELIZABETH L. STAMESHKIN (260865)
lstameshkin@cooley.com
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
PHILLIP E. MORTON (*pro hac vice*)
pmorton@cooley.com
1299 Pennsylvania Avenue NW, Suite 700
Washington, DC 20004
Telephone: (202) 842-7800

Attorneys for Defendant *Meta Platforms, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC. ET AL.,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S SECOND SET OF
INTERROGATORIES TO PLAINTIFF
CAMBRONNE INC.**

Trial Date: None
Date Action Filed: December 22, 2025

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF CAMBRONNE INC.

Set Number: TWO (2)

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Plaintiff Cambronne Inc. (“Cambronne” or “Plaintiff”) answer completely and in writing under oath within (30) days of service hereof each of the interrogatories set forth below (“Interrogatories”).

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 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. AGENT means any current or former agent, representative, employee, attorney, or other PERSON acting for YOU or on YOUR behalf with YOUR knowledge or authorization (express or implied).

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

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

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

6. 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.

1
2 7. THIRD PARTY means all PERSONS other than the named Parties to this ACTION.

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

7 9. DOCUMENT(S) means the original and all non-identical copies (including drafts and those
8 with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as defined in
9 Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil Procedure
10 34, and includes papers of all kinds and electronically stored information, including by way of
11 example and without limitation, electronic mail, letters, communications, memoranda, notes,
12 computer generated data, calendars, records, minutes, studies, reports, notebooks, messages,
13 telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written
14 notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data,
15 source code, data compilation, pictures, photographs, books, pamphlets, publications,
16 advertisements, sales literature, brochures, manuals, price lists, announcements, and any other
17 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.

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

23 11. DESCRIBE means to provide a detailed narrative statement or description of the specific
24 facts or matters to which an Interrogatory refers, including, but not limited to, an identification of
25 all PERSONS, COMMUNICATIONS, acts, transactions, events, agreements, recommendations,
26

1 and DOCUMENTS used, necessary, or desirable to support such statement or make the description
2 complete.

3 12. IDENTIFY (and variations thereof) means the following:

- 4 1. With respect to a natural person, provide the person's: (i) full name; (ii) current or
5 last known home address; (iii) current or last known business address; (iv) current
6 or last known email address; (v) current or last known occupation, employer and
7 business position or title; and (vi) current or last known telephone number.
- 8 2. With respect to an entity which is not a natural person, provide: (i) the full name of
9 the entity; (ii) the type of entity (e.g., corporation, partnership, sole proprietorship,
10 association); (iii) the name, address and telephone number of its principal place of
11 business; (iv) all names under which it is doing, or has ever done, business; (v) the
12 name(s) of the contact person(s); and (vi) the date or interval when such entity stood
in the capacity referenced by the interrogatory.
- 13 3. With respect to an event or action, (i) provide the date of the event or action; (ii)
14 state the person(s) present or involved; (iii) state the place or places where the event
15 or action took place.
- 16 4. With respect to a DOCUMENT, (i) state the originator, author, addressee, recipient;
17 (ii) describe the contents; (iii) state the date of the document; and (iv) identify all
PERSONS with knowledge of any of the foregoing.
- 18 5. With respect to a fact, means to (i) describe the fact; (ii) state when it became known
19 to YOU or YOUR AGENTS; (iii) identify the source from which YOU or YOUR
20 AGENTS learned the fact; and (iv) identify the DOCUMENTS that record, show or
21 refer to the fact.

22 13. FINANCIAL AND SALES DATA means data related to the sales of products or services
23 by YOU or on YOUR behalf, including but not limited to sales quantities, retail prices, wholesale
24 prices, gross revenues, and net revenues (accounting for returns and other costs). For the avoidance
25 of doubt, revenues include, but are not limited to, gross revenues, net revenues (accounting for
26

1 returns, discounts, and allowances), retail sales, wholesale sales, sales of physical and digital
2 magazines, licensing revenue, and affiliate revenue for physical and digital media, including but
3 not limited to physical books, eBooks and eEditions, and audiobooks. As used in this definition,
4 “costs” include, but are not limited to, costs of goods sold (COGS), unit production costs, royalty
5 expenses, author advances, eBook conversion/hosting costs, spoilage, fulfillment costs, author
6 freight, and marketing expenses for physical and digital media, including but not limited to physical
7 books, eBooks and eEditions, and audiobooks.

8 **INSTRUCTIONS**

9
10 1. Wherever used herein: the singular shall include the plural and vice versa; verb tenses shall
11 be interpreted to include past, present, and future tenses; the word “all” includes the word “any”
12 and vice versa; the word “each” includes “every” and vice versa; and the terms “and” and “or” shall
13 be construed either disjunctively or conjunctively as necessary to bring within the scope of these
14 Interrogatories any DOCUMENTS or information that might otherwise be construed to be outside
15 their scope.

16 2. Any terms not specifically defined shall be given their ordinary meaning as YOU
17 understand them to be used in the trade.

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

20 4. YOU are requested to answer each Interrogatory set forth below separately and completely
21 in writing under oath. YOUR response hereto is to be signed and verified by the PERSON making
22 it, and the objections signed by the attorney making them, as required by Federal Rule of Civil
23 Procedure 33(b).

24 5. Each Interrogatory shall be answered fully unless it is objected to in good faith, in which
25 event the reasons for YOUR objection shall be stated in detail. If an objection pertains to only a
26 portion of an Interrogatory, or a word, phrase or clause contained within it, YOU are required to
state YOUR objection to that portion only and to respond to the remainder of the Interrogatory,

1 using YOUR best efforts to do so. If YOU object based on a purported ambiguity in construing an
2 Interrogatory, or a word, phrase, or clause contained within it, or an Instruction or Definition, such
3 objection shall not serve as a basis for refusing to answer; YOU must set forth in YOUR answer
4 the allegedly ambiguous language and the construction chosen or used to provide a complete
5 response.

6 6. If YOU assert that any information responsive to any Interrogatory is privileged or
7 otherwise protected from discovery, YOU are requested to comply with the requirements of Federal
8 Rule of Civil Procedure 26(b)(5) as to each DOCUMENT, thing, COMMUNICATION or piece of
9 information for which a claim of privilege or protection from discovery is made. For any
10 information withheld on the ground that it is privileged or otherwise protected from discovery,
11 identify the information or DOCUMENT, describe its subject matter and date, identify all authors
12 and all recipients (including copied and blind copied recipients), and specify the basis for the
claimed privilege or other grounds of exclusion.

13 7. If YOU answer any of the Interrogatories by reference to records from which the answer
14 may be derived or ascertained, YOU are required to comply with the requirements of Federal Rule
15 of Civil Procedure 33. YOU are requested to comply with the Instructions set forth in Defendants'
16 document requests with respect to any such records produced.

17 8. If and to the extent that YOU object to all or any part of an Interrogatory, or otherwise are
18 unable to respond to any Interrogatory after exercising due diligence, in whole or in part, for any
19 reason other than a claim of privilege, state the reasons for such objection or inability to respond.
20 If YOU object to or are otherwise unable to respond to any part of an Interrogatory, please provide
all information responsive to the remainder.

21 9. If an Interrogatory is silent as to the time period for which information is sought, YOUR
22 response should include all information known to you CONCERNING events that occurred, in
23 whole or in part, at any time during the period of 2015 to the present, and CONCERNING activities
24 in the United States.

1
2 10. These Interrogatories are continuing in nature and YOUR responses to them are to be
3 promptly supplemented or amended if, after the time of YOUR initial responses, YOU learn that
4 any response is or has become in some material respect incomplete or incorrect, pursuant to Federal
5 Rule of Civil Procedure 26(e).

6 **INTERROGATORIES**

7 **INTERROGATORY NO. 15**

8 DESCRIBE, on a work-by-work basis for each month from date of first publication through
9 present, FINANCIAL AND SALES DATA for: (i) each physical book sold by YOU or on YOUR
10 behalf through each channel of distribution YOU use to sell physical books; (ii) each eBook sold
11 by YOU or on YOUR behalf through each channel of distribution YOU use to sell eBooks; (iii)
12 each audiobook sold by YOU or on YOUR behalf through each channel of distribution YOU use
13 to sell audiobooks; and (iv) any other category of physical or digital works published by YOU or
14 on YOUR behalf through each channel of distribution YOU use to sell such works. For the
15 avoidance of doubt, this Interrogatory is not limited to YOUR ASSERTED WORKS.

16 **INTERROGATORY NO. 16**

17 IDENTIFY the number of books, including title of such books and any other associated
18 book identifiers (such as ISBN-10, ISBN-13 or EAN), published by YOU or on YOUR behalf by
19 month, beginning from the earliest month and year of publication of a work as to which you are
20 asserting a claim in this case to the present.
21
22
23
24
25
26

1 Dated: July 31, 2026

2
3 By:/s/ Jessica E. Phillips

4 DUNN ISAACSON RHEE LLP
5 KAREN L. DUNN (*pro hac vice*)
6 (kdunn@dirllp.com)
7 JESSICA E. PHILLIPS (*pro hac vice*)
8 (jphillips@dirllp.com)
9 KYLE N. SMITH (*pro hac vice*)
10 (ksmith@dirllp.com)
11 401 9th Street NW
12 Washington, DC 20004
13 Telephone: (202) 240-2900

14 COOLEY LLP
15 BOBBY GHAJAR (SBN 198719)
16 (bghajar@cooley.com)
17 1333 2nd Street, Suite 400
18 Santa Monica, CA 90401
19 Telephone: (310) 883-6400
20 Facsimile: (310) 883-6500
21 KATHLEEN R. HARTNETT (SBN 314267)
22 (khartnett@cooley.com)
23 3 Embarcadero Center, 20th Floor
24 San Francisco, CA 94111-4004
25 Telephone: (415) 693-2071
26 Facsimile: (415) 693-2222
MARK R. WEINSTEIN (SBN 193043)
(mweinstein@cooley.com)
ELIZABETH L. STAMESHKIN (SBN 260865)
(lstameshkin@cooley.com)
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
Facsimile: (650) 849-7400
PHILLIP E. MORTON (*pro hac vice*)
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004
Telephone: (202) 842-7800

CLEARY GOTTlieb STEEN & HAMILTON LLP
ANGELA L. DUNNING (SBN 212047)
(adunning@cgsh.com)
151 University Ave
Palo Alto, CA 94301
Telephone: (650) 815-4131

Attorneys for Defendant
Meta Platforms, Inc.

PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of Virginia. I am employed in Washington, D.C. I am over the age of eighteen years, and not a party to the within action. My business address is Dunn Isaacson Rhee LLP, 401 9th Street NW, Washington D.C. 20004. On the date set forth below I served the documents described below in the manner described below:

- **DEFENDANT META PLATFORMS, INC.'S THIRD SET OF INTERROGATORIES TO PLAINTIFF CAMBRONNE INC.**

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

on the following part(ies) in this action:

STRIS & MAHER LLP
Elizabeth Brannen (SBN 226234)
ebrannen@stris.com
John Stokes (SBN 310847)
jstokes@stris.com
Lauren Martin (SBN 294367)
lmartin@stris.com
17785 Center Court Dr N, Ste 600
Cerritos, CA 90703
T: (213) 995-6800
F: (213) 261-0299

FREEDMAN NORMAND FRIEDLAND LLP
Devin (Velvel) Freedman (*pro hac vice* forthcoming)
vel@fnf.law
Kyle Roche (*pro hac vice* forthcoming)
kroche@fnf.law
Alex Potter (*pro hac vice* forthcoming)
apotter@fnf.law
155 E. 44th Street, Ste 915
New York, NY 10017
T: (646) 494-2900

Christopher M. Rigali (*pro hac vice*)
crigali@stris.com
Jacqueline Sahlberg (*pro hac vice*)
jsahlberg@stris.com
1717 K St NW Ste 900
Washington, DC 20006
T: (202) 800-5749

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

/s/ Kyle N. Smith

Kyle N. Smith

DUNN ISAACSON RHEE LLP
KAREN L. DUNN (*pro hac vice*)
(kdunn@dirllp.com)
JESSICA E. PHILLIPS (*pro hac vice*)
(jphillips@dirllp.com)
KYLE N. SMITH (*pro hac vice*)
(ksmith@dirllp.com)
401 9th Street NW
Washington, DC 20004
Telephone: (202) 240-2900

CLEARY GOTTlieb STEEN &
HAMILTON LLP
ANGELA L. DUNNING (212047)
adunning@cgsh.com
151 University Ave
Palo Alto, CA 94301
Telephone: (650) 815-4131

COOLEY LLP
BOBBY A. GHAJAR (198719)
bghajar@cooley.com
1333 2nd Street, Suite 400
Santa Monica, CA 90401
Telephone: (310) 883-6400
KATHLEEN R. HARTNETT (314267)
khartnett@cooley.com
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Telephone: (415) 693-2071
MARK R. WEINSTEIN (193043)
mweinstein@cooley.com
ELIZABETH L. STAMESHKIN (260865)
lstameshkin@cooley.com
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
PHILLIP E. MORTON (*pro hac vice*)
pmorton@cooley.com
1299 Pennsylvania Avenue NW, Suite 700
Washington, DC 20004
Telephone: (202) 842-7800

Attorneys for Defendant *Meta Platforms, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC. ET AL.,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S SECOND SET OF
INTERROGATORIES TO PLAINTIFF
MATTHEW SACKS**

Trial Date: None
Date Action Filed: December 22, 2025

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF MATTHEW SACKS

Set Number: TWO (2)

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Plaintiff Matthew Sacks (“Matthew Sacks” or “Plaintiff”) answer completely and in writing under oath within (30) days of service hereof each of the interrogatories set forth below (“Interrogatories”).

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 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. AGENT means any current or former agent, representative, employee, attorney, or other PERSON acting for YOU or on YOUR behalf with YOUR knowledge or authorization (express or implied).

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

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

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

6. 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.

1
2 7. THIRD PARTY means all PERSONS other than the named Parties to this ACTION.

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

7 9. DOCUMENT(S) means the original and all non-identical copies (including drafts and those
8 with any notations) of all “documents,” “writings,” “recordings,” and “photographs” as defined in
9 Rule 1001 of the Federal Rules of Evidence and encompassed by Federal Rule of Civil Procedure
10 34, and includes papers of all kinds and electronically stored information, including by way of
11 example and without limitation, electronic mail, letters, communications, memoranda, notes,
12 computer generated data, calendars, records, minutes, studies, reports, notebooks, messages,
13 telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written
14 notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data,
15 source code, data compilation, pictures, photographs, books, pamphlets, publications,
16 advertisements, sales literature, brochures, manuals, price lists, announcements, and any other
17 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.

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

23 11. DESCRIBE means to provide a detailed narrative statement or description of the specific
24 facts or matters to which an Interrogatory refers, including, but not limited to, an identification of
25 all PERSONS, COMMUNICATIONS, acts, transactions, events, agreements, recommendations,
26

1 and DOCUMENTS used, necessary, or desirable to support such statement or make the description
2 complete.

3 12. IDENTIFY (and variations thereof) means the following:

- 4 1. With respect to a natural person, provide the person's: (i) full name; (ii) current or
5 last known home address; (iii) current or last known business address; (iv) current
6 or last known email address; (v) current or last known occupation, employer and
7 business position or title; and (vi) current or last known telephone number.
- 8 2. With respect to an entity which is not a natural person, provide: (i) the full name of
9 the entity; (ii) the type of entity (e.g., corporation, partnership, sole proprietorship,
10 association); (iii) the name, address and telephone number of its principal place of
11 business; (iv) all names under which it is doing, or has ever done, business; (v) the
12 name(s) of the contact person(s); and (vi) the date or interval when such entity stood
in the capacity referenced by the interrogatory.
- 13 3. With respect to an event or action, (i) provide the date of the event or action; (ii)
14 state the person(s) present or involved; (iii) state the place or places where the event
15 or action took place.
- 16 4. With respect to a DOCUMENT, (i) state the originator, author, addressee, recipient;
17 (ii) describe the contents; (iii) state the date of the document; and (iv) identify all
PERSONS with knowledge of any of the foregoing.
- 18 5. With respect to a fact, means to (i) describe the fact; (ii) state when it became known
19 to YOU or YOUR AGENTS; (iii) identify the source from which YOU or YOUR
20 AGENTS learned the fact; and (iv) identify the DOCUMENTS that record, show or
21 refer to the fact.

22 13. FINANCIAL AND SALES DATA means data related to the sales of products or services
23 by YOU or on YOUR behalf, including but not limited to sales quantities, retail prices, wholesale
24 prices, gross revenues, and net revenues (accounting for returns and other costs). For the avoidance
25 of doubt, revenues include, but are not limited to, gross revenues, net revenues (accounting for
26

1 returns, discounts, and allowances), retail sales, wholesale sales, sales of physical and digital
2 magazines, licensing revenue, and affiliate revenue for physical and digital media, including but
3 not limited to physical books, eBooks and eEditions, and audiobooks. As used in this definition,
4 “costs” include, but are not limited to, costs of goods sold (COGS), unit production costs, royalty
5 expenses, author advances, eBook conversion/hosting costs, spoilage, fulfillment costs, author
6 freight, and marketing expenses for physical and digital media, including but not limited to physical
7 books, eBooks and eEditions, and audiobooks.

8 **INSTRUCTIONS**

9
10 1. Wherever used herein: the singular shall include the plural and vice versa; verb tenses shall
11 be interpreted to include past, present, and future tenses; the word “all” includes the word “any”
12 and vice versa; the word “each” includes “every” and vice versa; and the terms “and” and “or” shall
13 be construed either disjunctively or conjunctively as necessary to bring within the scope of these
14 Interrogatories any DOCUMENTS or information that might otherwise be construed to be outside
15 their scope.

16 2. Any terms not specifically defined shall be given their ordinary meaning as YOU
17 understand them to be used in the trade.

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

20 4. YOU are requested to answer each Interrogatory set forth below separately and completely
21 in writing under oath. YOUR response hereto is to be signed and verified by the PERSON making
22 it, and the objections signed by the attorney making them, as required by Federal Rule of Civil
23 Procedure 33(b).

24 5. Each Interrogatory shall be answered fully unless it is objected to in good faith, in which
25 event the reasons for YOUR objection shall be stated in detail. If an objection pertains to only a
26 portion of an Interrogatory, or a word, phrase or clause contained within it, YOU are required to
state YOUR objection to that portion only and to respond to the remainder of the Interrogatory,

1 using YOUR best efforts to do so. If YOU object based on a purported ambiguity in construing an
2 Interrogatory, or a word, phrase, or clause contained within it, or an Instruction or Definition, such
3 objection shall not serve as a basis for refusing to answer; YOU must set forth in YOUR answer
4 the allegedly ambiguous language and the construction chosen or used to provide a complete
5 response.

6 6. If YOU assert that any information responsive to any Interrogatory is privileged or
7 otherwise protected from discovery, YOU are requested to comply with the requirements of Federal
8 Rule of Civil Procedure 26(b)(5) as to each DOCUMENT, thing, COMMUNICATION or piece of
9 information for which a claim of privilege or protection from discovery is made. For any
10 information withheld on the ground that it is privileged or otherwise protected from discovery,
11 identify the information or DOCUMENT, describe its subject matter and date, identify all authors
12 and all recipients (including copied and blind copied recipients), and specify the basis for the
claimed privilege or other grounds of exclusion.

13 7. If YOU answer any of the Interrogatories by reference to records from which the answer
14 may be derived or ascertained, YOU are required to comply with the requirements of Federal Rule
15 of Civil Procedure 33. YOU are requested to comply with the Instructions set forth in Defendants'
16 document requests with respect to any such records produced.

17 8. If and to the extent that YOU object to all or any part of an Interrogatory, or otherwise are
18 unable to respond to any Interrogatory after exercising due diligence, in whole or in part, for any
19 reason other than a claim of privilege, state the reasons for such objection or inability to respond.
20 If YOU object to or are otherwise unable to respond to any part of an Interrogatory, please provide
all information responsive to the remainder.

21 9. If an Interrogatory is silent as to the time period for which information is sought, YOUR
22 response should include all information known to you CONCERNING events that occurred, in
23 whole or in part, at any time during the period of 2015 to the present, and CONCERNING activities
24 in the United States.

1
2 10. These Interrogatories are continuing in nature and YOUR responses to them are to be
3 promptly supplemented or amended if, after the time of YOUR initial responses, YOU learn that
4 any response is or has become in some material respect incomplete or incorrect, pursuant to Federal
5 Rule of Civil Procedure 26(e).

6 **INTERROGATORIES**

7 **INTERROGATORY NO. 15**

8 DESCRIBE, on a work-by-work basis for each month from date of first publication through
9 present, FINANCIAL AND SALES DATA for: (i) each physical book sold by YOU or on YOUR
10 behalf through each channel of distribution YOU use to sell physical books; (ii) each eBook sold
11 by YOU or on YOUR behalf through each channel of distribution YOU use to sell eBooks; (iii)
12 each audiobook sold by YOU or on YOUR behalf through each channel of distribution YOU use
13 to sell audiobooks; and (iv) any other category of physical or digital works published by YOU or
14 on YOUR behalf through each channel of distribution YOU use to sell such works. For the
15 avoidance of doubt, this Interrogatory is not limited to YOUR ASSERTED WORKS.

16 **INTERROGATORY NO. 16**

17 IDENTIFY the number of books, including title of such books and any other associated
18 book identifiers (such as ISBN-10, ISBN-13 or EAN), published by YOU or on YOUR behalf by
19 month, beginning from the earliest month and year of publication of a work as to which you are
20 asserting a claim in this case to the present.
21
22
23
24
25
26

1 Dated: July 31, 2026

2
3 By:/s/ Jessica E. Phillips

4 DUNN ISAACSON RHEE LLP
5 KAREN L. DUNN (*pro hac vice*)
6 (kdunn@dirllp.com)
7 JESSICA E. PHILLIPS (*pro hac vice*)
8 (jphillips@dirllp.com)
9 KYLE N. SMITH (*pro hac vice*)
10 (ksmith@dirllp.com)
11 401 9th Street NW
12 Washington, DC 20004
13 Telephone: (202) 240-2900

14 COOLEY LLP
15 BOBBY GHAJAR (SBN 198719)
16 (bghajar@cooley.com)
17 1333 2nd Street, Suite 400
18 Santa Monica, CA 90401
19 Telephone: (310) 883-6400
20 Facsimile: (310) 883-6500
21 KATHLEEN R. HARTNETT (SBN 314267)
22 (khartnett@cooley.com)
23 3 Embarcadero Center, 20th Floor
24 San Francisco, CA 94111-4004
25 Telephone: (415) 693-2071
26 Facsimile: (415) 693-2222
MARK R. WEINSTEIN (SBN 193043)
(mweinstein@cooley.com)
ELIZABETH L. STAMESHKIN (SBN 260865)
(lstameshkin@cooley.com)
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
Facsimile: (650) 849-7400
PHILLIP E. MORTON (*pro hac vice*)
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004
Telephone: (202) 842-7800

CLEARY GOTTlieb STEEN & HAMILTON LLP
ANGELA L. DUNNING (SBN 212047)
(adunning@cgsh.com)
151 University Ave
Palo Alto, CA 94301
Telephone: (650) 815-4131

Attorneys for Defendant
Meta Platforms, Inc.

PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of Virginia. I am employed in Washington, D.C. I am over the age of eighteen years, and not a party to the within action. My business address is Dunn Isaacson Rhee LLP, 401 9th Street NW, Washington D.C. 20004. On the date set forth below I served the documents described below in the manner described below:

- **DEFENDANT META PLATFORMS, INC.'S THIRD SET OF INTERROGATORIES TO PLAINTIFF CAMBRONNE INC.**

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

on the following part(ies) in this action:

STRIS & MAHER LLP
Elizabeth Brannen (SBN 226234)
ebrannen@stris.com
John Stokes (SBN 310847)
jstokes@stris.com
Lauren Martin (SBN 294367)
lmartin@stris.com
17785 Center Court Dr N, Ste 600
Cerritos, CA 90703
T: (213) 995-6800
F: (213) 261-0299

FREEDMAN NORMAND FRIEDLAND LLP
Devin (Velvel) Freedman (*pro hac vice* forthcoming)
vel@fnf.law
Kyle Roche (*pro hac vice* forthcoming)
kroche@fnf.law
Alex Potter (*pro hac vice* forthcoming)
apotter@fnf.law
155 E. 44th Street, Ste 915
New York, NY 10017
T: (646) 494-2900

Christopher M. Rigali (*pro hac vice*)
crigali@stris.com
Jacqueline Sahlberg (*pro hac vice*)
jsahlberg@stris.com
1717 K St NW Ste 900
Washington, DC 20006
T: (202) 800-5749

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

/s/ Kyle N. Smith

Kyle N. Smith