

EXHIBIT O

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Attorneys for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

COGNELLA, INC.,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

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

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

Trial Date: May 24, 2027
 Date Action Filed: May 4, 2026

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

2 **RESPONDING PARTY: PLAINTIFF COGNELLA, INC.**

3 **SET NUMBER: ONE (1)**

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

8 **DEFINITIONS**

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

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

15 2. ACTION means the lawsuit titled *Cognella, Inc. v. Meta Platforms, Inc.*, Case No.
16 3:26-cv-04053-VC (N.D. Cal.).

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

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

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

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

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

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

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

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

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

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

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

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

1 electronically, photographically, or chemically. The term also includes any parent or child
2 attachment or other documents embedded or linked in any way to a requested DOCUMENT.

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

8 16. DESCRIBE means to provide a detailed narrative statement or description of the
9 specific facts or matters to which an Interrogatory refers, including, but not limited to, an
10 identification of all PERSONS, COMMUNICATIONS, acts, transactions, events, agreements,
11 recommendations, and DOCUMENTS used, necessary, or desirable to support such statement or
12 make the description complete.

13 17. IDENTIFY (and variations thereof) means the following:

- 14 1. With respect to a natural person, provide the person's: (i) full name; (ii) current or
15 last known home address; (iii) current or last known business address; (iv) current
16 or last known email address; (v) current or last known occupation, employer and
17 business position or title; and (vi) current or last known telephone number.
 - 18 2. With respect to an entity which is not a natural person, provide: (i) the full name of
19 the entity; (ii) the type of entity (e.g., corporation, partnership, sole proprietorship,
20 association); (iii) the name, address and telephone number of its principal place of
21 business; (iv) all names under which it is doing, or has ever done, business; (v) the
22 name(s) of the contact person(s); and (vi) the date or interval when such entity stood
23 in the capacity referenced by the interrogatory.
 - 24 3. With respect to an event or action, (i) provide the date of the event or action; (ii)
25 state the person(s) present or involved; (iii) state the place or places where the event
26 or action took place.
- 27
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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; (iii) identify the source from which YOU learned the fact; and (iv) identify the DOCUMENTS that record, show or refer to the fact.

INSTRUCTIONS

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

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

3. 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).

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

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

9 6. If YOU answer any of the Interrogatories by reference to records from which the
10 answer may be derived or ascertained, YOU are required to comply with the requirements of Federal
11 Rule of Civil Procedure 33. YOU are requested to comply with the Instructions set forth in
12 Defendant's document requests with respect to any such records produced.

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

18 8. If an Interrogatory is silent as to the time period for which information is sought,
19 YOUR response should include all information known to YOU CONCERNING events that
20 occurred, in whole or in part, at any time during the period of 2021 to the present except for the
21 Interrogatories relating to Plaintiff's works, which should go back to the creation of the
22 particular work(s) at issue.

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

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INTERROGATORIES**INTERROGATORY NO. 1:**

DESCRIBE all facts regarding the PERSONS who had a role, involvement, and/or contribution to the creation of each of the ASSERTED WORKS, including by providing (i) their full name; (ii) contact information; (iii) a description of their role, involvement, or contribution; (iv) how if at all they were compensated; and (v) whether there is any agreement with such PERSONS RELATING to the ownership or licensing of the ASSERTED WORKS (e.g. RELATING to sharing of revenue, royalties, ownership interest share, rights conferred, or work for hire agreement(s)).

INTERROGATORY NO. 2:

DESCRIBE all facts regarding all PERSONS (including but not limited to YOU or any publishers or digital or print platforms) who claim or have an ownership interest in the ASSERTED WORKS (whether by assignment, license, or otherwise), including by providing (i) their full name; (ii) contact information; (iii) a description of their ownership interest; and (iv) identification of supporting DOCUMENTS (by Bates number or otherwise).

INTERROGATORY NO. 3:

For each of YOUR ASSERTED WORKS, IDENTIFY each instance in which another PERSON has been licensed, permitted, or authorized to copy, display, distribute, publicly perform, or otherwise exercise any Section 106 rights with respect to each ASSERTED WORK, including by providing the date, PERSON, and agreement regarding each instance.

INTERROGATORY NO. 4:

DESCRIBE all facts regarding when YOU first became aware of Meta's alleged infringement of any of YOUR ASSERTED WORKS, including but not limited to the facts and circumstances surrounding YOUR becoming aware of this alleged infringement and IDENTIFY PERSONS most knowledgeable thereof.

INTERROGATORY NO. 5:

DESCRIBE (including with sufficient IDENTIFICATION) each ASSERTED WORK, including but not limited to identification of its: (a) title; (b) U.S. Copyright Office registration

1 number; (c) registration date; (d) description of the work; (e) author(s); (f) date of first publication
2 of the work; (g) current owner; (h) any chain-of-title agreements establishing YOUR ownership
3 thereof; and (i) the exclusive right allegedly infringed by Meta in connection with YOUR
4 allegations in the ACTION.

5 **INTERROGATORY NO. 6:**

6 For each of the ASSERTED WORKS for which there were contributors (i.e., individuals
7 who wrote any portion of an ASSERTED WORK that YOU claim contains protected expression),
8 DESCRIBE all facts RELATING to the basis on which YOU claim ownership of their
9 contributions, including but not limited to IDENTIFICATION of the contributors and details of
10 any written assignments.

11 **INTERROGATORY NO. 7:**

12 For each ASSERTED WORK, DESCRIBE the date(s) during which the work was made
13 available (either by YOU or with YOUR knowledge or permission) to the public (whether for
14 viewing, displaying, downloading, or other consumption), in whole or in part, without access
15 control or other restrictions (by way of example only, promotional excerpts, full text availability
16 on YOUR website(s), free downloads, etc.), and the reasons why YOU made it available without
17 access control or other restrictions.

18 **INTERROGATORY NO. 8:**

19 DESCRIBE all of the authorized channels through which the ASSERTED WORKS have
20 been made available to the public (whether for download, sale, display, or otherwise) including but
21 not limited to IDENTIFYING all websites (by URL), subscription services (e.g. Kindle) and retail
22 outlets (e.g. book stores, by name and location) and provide the dates each of the ASSERTED
23 WORKS was first and last available in such channels.

24 **INTERROGATORY NO. 9:**

25 If YOU contend that Meta's alleged use of YOUR ASSERTED WORKS in connection
26 with the research, development, and/or training of any META AI MODEL does not constitute fair
27 use, in whole or in part, because the operation and/or use of any META AI MODEL caused YOU
28 harm, whether to the market or potential market for, or the value of YOUR ASSERTED WORKS,

1 DESCRIBE all facts supporting the complete basis for any such contention, including but not
2 limited to the IDENTITY of each ASSERTED WORK whose market YOU contend is harmed, the
3 identity of the purported market for the ASSERTED WORK YOU contend was harmed, each
4 specific operation or use of the META AI MODEL that YOU contend has resulted in such harm,
5 the specific harm YOU contend was caused by that operation or use, and a detailed explanation of
6 how such operation or use of the META AI MODEL purportedly resulted in such harm.

7 **INTERROGATORY NO. 10:**

8 DESCRIBE all facts supporting YOUR allegations that YOU were harmed (including but
9 not limited to any injury, lost sales, lost subscriptions, or lost opportunities, alleged market harm,
10 and/or market dilution) by any META AI MODEL, including but not limited to: (a) any
11 opportunities, subscriptions, or readership allegedly lost because of a META AI MODEL,
12 including but not limited to any specific customers or licensing opportunities or subscriptions lost,
13 and any sales channels affected; (b) the factual basis for YOUR contention that a causal connection
14 between YOUR alleged harm and a META AI MODEL exists; (c) economic or statistical methods
15 YOU used to evaluate that harm; (d) any additional, alternative or contributory factors YOU
16 evaluated in considering the reasons for that alleged harm (e.g., macroeconomic shifts, non-Meta
17 AI models or tools, the availability of similar content online, shifting market dynamics, pricing, or
18 competition); and (e) YOUR quantification of such harm including corresponding financial figures,
19 readership data, subscription data, or other DOCUMENTS used or referenced as the basis for
20 computing such harm, the methodology used by YOU to compute such harm, and all PERSONS
21 who supplied knowledge or information that informed the foregoing.

22 **INTERROGATORY NO. 11:**

23 DESCRIBE YOUR processes, procedures, and/or guidelines for the use of GENERATIVE
24 AI TOOLS by YOUR EMPLOYEES and CONTRACTORS, including IDENTIFICATION of the
25 PERSONS most knowledgeable about the development and implementation of such processes,
26 procedures, and/or guidelines.

INTERROGATORY NO. 12:

DESCRIBE all facts YOU rely on to support YOUR allegation that Meta transmitted or uploaded to any THIRD PARTY any ASSERTED WORK during or via TORRENTING, including but not limited to the IDENTIFICATION of any THIRD PARTIES who received any ASSERTED WORK (or portion thereof) from Meta, all details of how the alleged transmission or uploading of any ASSERTED WORK (or portion thereof) occurred, what portions of YOUR ASSERTED WORKS were allegedly received by the THIRD PARTY, DOCUMENTS evidencing such transmission or uploading, and all PERSONS with knowledge of such alleged transmission or uploading.

INTERROGATORY NO. 13:

DESCRIBE all facts YOU rely on to support YOUR allegation that Meta contributed to THIRD PARTY infringement of any ASSERTED WORK, including but not limited to the IDENTIFICATION of each THIRD PARTY whose infringement Meta allegedly contributed to and, for each such THIRD PARTY, (a) the nature of the THIRD PARTY's alleged infringement, (b) all conduct by Meta that allegedly contributed to that infringement, (c) all facts YOU will rely on to support any contention that Meta knew or had reason to know that its conduct materially contributed to such THIRD PARTY's infringement, (d) DOCUMENTS evidencing Meta's alleged contributory infringement, and (e) all PERSONS with knowledge of Meta's alleged contributory infringement.

INTERROGATORY NO. 14:

DESCRIBE all facts supporting YOUR allegation that Meta knew or had reason to know that removal of Copyright Management Information ("CMI") from any ASSERTED WORK would induce, enable, facilitate, or conceal infringement of such work, including, but not limited to, IDENTIFICATION of the bases of YOUR allegation that removal of CMI conceals training data contents and any prompting of a META AI MODEL that YOU did to support this allegation.

1 Dated: June 12, 2026

2
3 By:/s/ Jessica E. Phillips

4 DUNN ISAACSON RHEE LLP
5 KAREN L. DUNN (*pro hac vice*)
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Attorneys for Defendant
Meta Platforms, Inc.

PROOF OF SERVICE

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

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



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

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

/s/ Jessica E. Phillips
Jessica E. Phillips

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Defendant.

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

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

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

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

3 **SET NUMBER: ONE (1)**

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

8 **DEFINITIONS**

9 The following terms shall have the following definitions and meanings, regardless of
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11 term is used:

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14 agents, attorneys, and other persons acting or purporting to act on its behalf.

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21 way of example and without limitation, electronic mail, letters, communications, memoranda,
22 notes, computer generated data, calendars, records, minutes, studies, reports, notebooks, messages,
23 telegrams, ledgers, legal instruments, agreements, drawings, sketches, graphs, prints, hand-written
24 notes, rough drafts, work pads, diaries, films, tapes, videotapes, sound recordings, images, data,
25 source code, data compilation, pictures, photographs, books, pamphlets, publications,
26 advertisements, sales literature, brochures, manuals, price lists, announcements, and any other
27 writings, records, or tangible objects produced or reproduced mechanically, electrically,
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5 to, commenting on, discussing, analyzing, considering, describing, containing, consisting of,
6 connected to, indicating, evidencing, supporting, or refuting.

7 16. DESCRIBE means to provide a detailed narrative statement or description of the
8 specific facts or matters to which an Interrogatory refers, including, but not limited to, an
9 identification of all PERSONS, COMMUNICATIONS, acts, transactions, events, agreements,
10 recommendations, and DOCUMENTS used, necessary, or desirable to support such statement or
11 make the description complete.

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

13 (a) With respect to a natural person, provide the person's: (i) full name; (ii)
14 current or last known home address; (iii) current or last known business address; (iv) current or last
15 known email address; (v) current or last known occupation, employer and business position or title;
16 and (vi) current or last known telephone number.

17 (b) With respect to an entity which is not a natural person, provide: (i) the full name of
18 the entity; (ii) the type of entity (e.g., corporation, partnership, sole proprietorship, association);
19 (iii) the name, address and telephone number of its principal place of business; (iv) all names under
20 which it is doing, or has ever done, business; (v) the name(s) of the contact person(s); and (vi) the
21 date or interval when such entity stood in the capacity referenced by the interrogatory.

22 (c) With respect to an event or action, (i) provide the date of the event or action; (ii) state
23 the person(s) present or involved; and (iii) state the place or places where the event or action took
24 place.

25 (d) With respect to a DOCUMENT, (i) state the originator, author, addressee, recipient;
26 (ii) describe the contents; (iii) state the date of the document; and (iv) identify all PERSONS with
27 knowledge of any of the foregoing.

28 (e) With respect to a fact, (i) describe the fact; (ii) state when it became known to YOU;

1 (iii) identify the source from which YOU learned the fact; and (iv) identify the DOCUMENTS that
2 record, show or refer to the fact.

3 INSTRUCTIONS

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

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

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

15 4. Each Interrogatory shall be answered fully unless it is objected to in good faith, in
16 which event the reasons for YOUR objection shall be stated in detail. If an objection pertains to only
17 a portion of an Interrogatory, or a word, phrase or clause contained within it, YOU are required to
18 state YOUR objection to that portion only and to respond to the remainder of the Interrogatory,
19 using YOUR best efforts to do so. If YOU object based on a purported ambiguity in construing an
20 Interrogatory, or a word, phrase, or clause contained within it, or an Instruction or Definition, such
21 objection shall not serve as a basis for refusing to answer; YOU must set forth in YOUR answer the
22 allegedly ambiguous language and the construction chosen or used to provide a complete response.

23 5. If YOU assert that any information responsive to any Interrogatory is privileged or
24 otherwise protected from discovery, YOU are requested to comply with the requirements of Federal
25 Rule of Civil Procedure 26(b)(5) as to each DOCUMENT, thing, COMMUNICATION or piece of
26 information for which a claim of privilege or protection from discovery is made. For any information
27 withheld on the ground that it is privileged or otherwise protected from discovery, identify the
28 information or DOCUMENT, describe its subject matter and date, identify all authors and all

1 recipients (including copied and blind copied recipients), and specify the basis for the claimed
2 privilege or other grounds of exclusion.

3 6. If YOU answer any of the Interrogatories by reference to records from which the answer
4 may be derived or ascertained, YOU are required to comply with the requirements of Federal Rule of
5 Civil Procedure 33. YOU are requested to comply with the Instructions set forth in Defendant's
6 document requests with respect to any such records produced.

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

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

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

21 INTERROGATORIES

22 **INTERROGATORY NO. 1:**

23 DESCRIBE all facts regarding the PERSONS who had a role, involvement, and/or
24 contribution to the creation of each of the ASSERTED WORKS, including by providing (i) their
25 full name; (ii) contact information; (iii) a description of their role, involvement, or contribution;
26 (iv) how if at all they were compensated; and (v) whether there is any agreement with such
27 PERSONS RELATING to the ownership or licensing of the ASSERTED WORKS (e.g.
28 RELATING to sharing of revenue, royalties, ownership interest share, rights conferred, or work for

1 hire agreement(s)).

2 **INTERROGATORY NO. 2:**

3 DESCRIBE all facts regarding all PERSONS (including but not limited to YOU or any
4 publishers or digital or print platforms) who claim or have an ownership interest in the ASSERTED
5 WORKS (whether by assignment, license, or otherwise), including by providing (i) their full name;
6 (ii) contact information; (iii) a description of their ownership interest; and (iv) identification of
7 supporting DOCUMENTS (by Bates number or otherwise).

8 **INTERROGATORY NO. 3:**

9 For each of YOUR ASSERTED WORKS, IDENTIFY each instance in which another
10 PERSON has been licensed, permitted, or authorized to copy, display, distribute, publicly perform,
11 or otherwise exercise any Section 106 rights with respect to each ASSERTED WORK, including
12 by providing the date, PERSON, and agreement regarding each instance.

13 **INTERROGATORY NO. 4:**

14 DESCRIBE all facts regarding when YOU first became aware of Meta's alleged
15 infringement of any of YOUR ASSERTED WORKS including but not limited to the facts and
16 circumstances surrounding YOUR becoming aware of this alleged infringement and IDENTIFY
17 PERSONS most knowledgeable thereof.

18 **INTERROGATORY NO. 5:**

19 DESCRIBE (including with sufficient IDENTIFICATION) each ASSERTED WORK,
20 including but not limited to identification of its: (a) title; (b) U.S. Copyright Office registration
21 number; (c) registration date; (d) description of the work; (e) author(s); (f) date of first publication
22 of the work; (g) current owner; (h) any chain-of-title agreements establishing YOUR ownership
23 thereof; and (i) the exclusive right allegedly infringed by Meta in connection with YOUR
24 allegations in the ACTION.

25 **INTERROGATORY NO. 6:**

26 For each of the ASSERTED WORKS for which there were contributors (i.e., individuals
27 who wrote any portion of an ASSERTED WORK that YOU claim contains protected expression),
28 DESCRIBE all facts RELATING to the basis on which YOU claim ownership of their

1 contributions, including but not limited to IDENTIFICATION of the contributors and details of
2 any written assignments.

3 **INTERROGATORY NO. 7:**

4 For each ASSERTED WORK, DESCRIBE the date(s) during which the work was made
5 available (either by YOU or with YOUR knowledge or permission) to the public (whether for
6 viewing, displaying, downloading, or other consumption), in whole or in part, without access
7 control or other restrictions (by way of example only, promotional excerpts, full text availability
8 on YOUR website(s), free downloads, etc.), and the reasons why YOU made it available without
9 access control or other restrictions.

10 **INTERROGATORY NO. 8:**

11 DESCRIBE all of the authorized channels through which the ASSERTED WORKS have
12 been made available to the public (whether for download, sale, display, or otherwise) including but
13 not limited to IDENTIFYING all websites (by URL), subscription services (e.g. Kindle) and retail
14 outlets (e.g. bookstores, by name and location) and provide the dates each of the ASSERTED
15 WORKS were first and last available in such channels.

16 **INTERROGATORY NO. 9:**

17 If YOU contend that Meta's alleged use of YOUR ASSERTED WORKS in connection
18 with the research, development, and/or training of any META AI MODEL does not constitute fair
19 use, in whole or in part, because the operation and/or use of any META AI MODEL caused YOU
20 harm, whether to the market or potential market for, or the value of YOUR ASSERTED WORKS,
21 DESCRIBE all facts supporting the complete basis for any such contention, including but not
22 limited to the IDENTITY of each ASSERTED WORK whose market YOU contend is harmed, the
23 IDENTITY of the purported market for the ASSERTED WORK YOU contend was harmed, each
24 specific operation or use of the META AI MODEL that YOU contend has resulted in such harm,
25 the specific harm YOU contend was caused by that operation or use, and a detailed explanation of
26 how such operation or use of the META AI MODEL purportedly resulted in such harm.

27 **INTERROGATORY NO. 10:**

28 DESCRIBE all facts supporting YOUR allegations that YOU were harmed (including but

not limited to any injury, lost sales, lost subscriptions, or lost opportunities, alleged market harm, and/or market dilution) by any META AI MODEL, including but not limited to: (a) any opportunities, subscriptions, or readership allegedly lost because of a META AI MODEL, including but not limited to any specific customers or licensing opportunities or subscriptions lost, and any sales channels affected; (b) the factual basis for YOUR contention that a causal connection between YOUR alleged harm and a META AI MODEL exists; (c) economic or statistical methods YOU used to evaluate that harm; (d) any additional, alternative or contributory factors YOU evaluated in considering the reasons for that alleged harm (e.g., macroeconomic shifts, non-Meta AI models or tools, the availability of similar content online, shifting market dynamics, pricing, or competition); and (e) YOUR quantification of such harm including corresponding financial figures, readership data, subscription data, or other DOCUMENTS used or referenced as the basis for computing such harm, the methodology used by YOU to compute such harm, and all PERSONS who supplied knowledge or information that informed the foregoing.

INTERROGATORY NO. 11:

DESCRIBE YOUR processes, procedures, and/or guidelines for the use of GENERATIVE AI TOOLS by YOUR employees and contractors, including IDENTIFICATION of the PERSONS most knowledgeable about the development and implementation of such processes, procedures, and/or guidelines.

INTERROGATORY NO. 12:

DESCRIBE all facts supporting YOUR allegation that Meta transmitted or uploaded to any THIRD PARTY any ASSERTED WORK, or any portion thereof, during TORRENTING, including but not limited to the IDENTIFICATION of any THIRD PARTIES who received any ASSERTED WORK (or portion thereof) from Meta, all details of how the alleged transmission or uploading of any ASSERTED WORK (or portion thereof) occurred, DOCUMENTS evidencing such transmission or uploading, and all PERSONS with knowledge of such alleged transmission or uploading.

INTERROGATORY NO. 13:

DESCRIBE all facts supporting YOUR allegation that Meta contributed to the infringement

1 of any ASSERTED WORK, or any portion thereof, including but not limited to the
2 IDENTIFICATION of (a) any THIRD PARTY to whose infringing activity Meta allegedly
3 contributed, (b) all conduct by Meta that allegedly contributed to the infringement of any
4 ASSERTED WORK by such THIRD PARTY, (c) all facts supporting any contention that Meta
5 knew or had reason to know that its conduct materially contributed to such THIRD PARTY's
6 infringement, (d) DOCUMENTS evidencing Meta's alleged contributory infringement, and (e) all
7 PERSONS with knowledge of Meta's alleged contributory infringement.

8 **INTERROGATORY No. 14:**

9 DESCRIBE all facts supporting YOUR allegation that Meta knew or had reason to know
10 that removal of CMI from any ASSERTED WORK would induce, enable, facilitate, or
11 conceal infringement of such work, including, but not limited to, IDENTIFICATION of the bases
12 of YOUR allegation that removal of CMI conceals training data contents and any prompting of a
13 META AI MODEL that YOU did to support this allegation.

1 Dated: June 15, 2026

2
3 By:/s/ Jessica E. Phillips

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Attorneys for Defendant *Meta Platforms, Inc.*

PROOF OF SERVICE

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

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



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

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

/s/ Jessica E. Phillips
Jessica E. Phillips

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Attorneys for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC., *et al.*,

Plaintiffs,

v.
META PLATFORMS, INC.,

Defendant.

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

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

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

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

2 **RESPONDING PARTY: PLAINTIFF JANE ADAMS**

3 **SET NUMBER: ONE (1)**

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

8 **DEFINITIONS**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

6 16. DESCRIBE means to provide a detailed narrative statement or description of the
7 specific facts or matters to which an Interrogatory refers, including, but not limited to, an
8 identification of all PERSONS, COMMUNICATIONS, acts, transactions, events, agreements,
9 recommendations, and DOCUMENTS used, necessary, or desirable to support such statement or
10 make the description complete.

11 17. IDENTIFY (and variations thereof) means the following:

12 (a) With respect to a natural person, provide the person's: (i) full name; (ii)
13 current or last known home address; (iii) current or last known business address; (iv) current or last
14 known email address; (v) current or last known occupation, employer and business position or title;
15 and (vi) current or last known telephone number.

16 (b) With respect to an entity which is not a natural person, provide: (i) the full name of
17 the entity; (ii) the type of entity (e.g., corporation, partnership, sole proprietorship, association);
18 (iii) the name, address and telephone number of its principal place of business; (iv) all names under
19 which it is doing, or has ever done, business; (v) the name(s) of the contact person(s); and (vi) the
20 date or interval when such entity stood in the capacity referenced by the interrogatory.

21 (c) With respect to an event or action, (i) provide the date of the event or action; (ii) state
22 the person(s) present or involved; (iii) state the place or places where the event or action took place.

23 (d) With respect to a DOCUMENT, (i) state the originator, author, addressee, recipient;
24 (ii) DESCRIBE the contents; (iii) state the date of the DOCUMENT; and (iv) IDENTIFY all
25 PERSONS with knowledge of any of the foregoing.

26 (e) With respect to a fact, means to (i) DESCRIBE the fact; (ii) state when it became
27 known to YOU; (iii) IDENTIFY the source from which YOU learned the fact; and (iv) IDENTIFY
28 the DOCUMENTS that record, show or refer to the fact.

INSTRUCTIONS

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3 tenses shall be interpreted to include past, present, and future tenses; the word “all” includes the
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8 not limited to, the referenced item(s), matter(s), or subject(s).

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14 which event the reasons for YOUR objection shall be stated in detail. If an objection pertains to only
15 a portion of an Interrogatory, or a word, phrase or clause contained within it, YOU are required to
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20 allegedly ambiguous language and the construction chosen or used to provide a complete response.

21 5. If YOU assert that any information responsive to any Interrogatory is privileged or
22 otherwise protected from discovery, YOU are requested to comply with the requirements of Federal
23 Rule of Civil Procedure 26(b)(5) as to each DOCUMENT, thing, COMMUNICATION or piece of
24 information for which a claim of privilege or protection from discovery is made. For any information
25 withheld on the ground that it is privileged or otherwise protected from discovery, IDENTIFY the
26 information or DOCUMENT, DESCRIBE its subject matter and date, IDENTIFY all authors and
27 all recipients (including copied and blind copied recipients), and specify the basis for the claimed
28 privilege or other grounds of exclusion.

1 DESCRIBE all facts regarding all PERSONS (including but not limited to YOU or any
2 publishers or digital or print platforms) who claim or have an ownership interest in the ASSERTED
3 WORKS (whether by assignment, license, or otherwise), including by providing (i) their full name;
4 (ii) contact information; (iii) a description of their ownership interest; and (iv) identification of
5 supporting DOCUMENTS (by Bates number or otherwise).

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7 For each of YOUR ASSERTED WORKS, IDENTIFY each instance in which another
8 PERSON has been licensed, permitted, or authorized to copy, display, distribute, publicly perform,
9 or otherwise exercise any Section 106 rights with respect to each ASSERTED WORK, including
10 by providing the date, PERSON, and agreement regarding each instance.

11 **INTERROGATORY NO. 4:**

12 DESCRIBE all facts regarding when YOU first became aware of Meta's alleged
13 infringement of YOUR ASSERTED WORKS including but not limited to the facts and
14 circumstances surrounding YOUR becoming aware of this alleged infringement and IDENTIFY
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24 For each of the ASSERTED WORKS for which there were contributors (i.e., individuals
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26 DESCRIBE all facts RELATING to the basis on which YOU claim ownership of their
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28 any written assignments.

INTERROGATORY NO. 7:

For each ASSERTED WORK, DESCRIBE the date(s) during which the work was made available (either by YOU or with YOUR knowledge or permission) to the public (whether for viewing, displaying, downloading, or other consumption), in whole or in part, without access control or other restrictions (by way of example only, promotional excerpts, full text availability on YOUR website(s), free downloads, etc.), and the reasons why YOU made it available without access control or other restrictions.

INTERROGATORY NO. 8:

DESCRIBE all of the authorized channels through which the ASSERTED WORKS have been made available to the public (whether for download, sale, display, or otherwise) including but not limited to IDENTIFYING all websites (by URL), subscription services (e.g. Kindle) and retail outlets (e.g. bookstores, by name and location) and provide the dates each of the ASSERTED WORKS were first and last available in such channels.

INTERROGATORY NO. 9:

If YOU contend that Meta's alleged use of YOUR ASSERTED WORKS in connection with the research, development, and/or training of any META AI MODEL does not constitute fair use, in whole or in part, because the operation and/or use of any META AI MODEL caused YOU harm, whether to the market or potential market for, or the value of YOUR ASSERTED WORKS, DESCRIBE all facts supporting the complete basis for any such contention, including but not limited to the identity of each ASSERTED WORK whose market YOU contend is harmed, the identity of the purported market for the ASSERTED WORK YOU contend was harmed, each specific operation or use of the META AI MODEL that YOU contend has resulted in such harm, the specific harm YOU contend was caused by that operation or use, and a detailed explanation of how such operation or use of the META AI MODEL purportedly resulted in such harm.

INTERROGATORY NO. 10:

DESCRIBE all facts supporting YOUR allegations that YOU were harmed (including but not limited to any injury, lost sales, lost subscriptions, or lost opportunities, alleged market harm, and/or market dilution) by any META AI MODEL, including but not limited to: (a) any

1 opportunities, subscriptions, or readership allegedly lost because of a META AI MODEL,
2 including but not limited to any specific customers or licensing opportunities or subscriptions lost,
3 and any sales channels affected; (b) the factual basis for YOUR contention that a causal connection
4 between YOUR alleged harm and a META AI MODEL exists; (c) economic or statistical methods
5 YOU used to evaluate that harm; (d) any additional, alternative or contributory factors YOU
6 evaluated in considering the reasons for that alleged harm (e.g., macroeconomic shifts, non-Meta
7 AI models or tools, the availability of similar content online, shifting market dynamics, pricing, or
8 competition); and (e) YOUR quantification of such harm including corresponding financial figures,
9 readership data, subscription data, or other DOCUMENTS used or referenced as the basis for
10 computing such harm, the methodology used by YOU to compute such harm, and all PERSONS
11 who supplied knowledge or information that informed the foregoing.

12 **INTERROGATORY NO. 11:**

13 DESCRIBE YOUR processes, procedures, and/or guidelines for the use of GENERATIVE
14 AI TOOLS by YOUR employees and contractors, including IDENTIFICATION of the PERSONS
15 most knowledgeable about the development and implementation of such processes, procedures,
16 and/or guidelines.

17 **INTERROGATORY NO. 12:**

18 DESCRIBE all facts supporting YOUR allegation that Meta transmitted or uploaded to any
19 THIRD PARTY any ASSERTED WORK, or any portion thereof, during TORRENTING,
20 including but not limited to the IDENTIFICATION of any THIRD PARTIES who received any
21 ASSERTED WORK (or portion thereof) from Meta, all details of how the alleged transmission or
22 uploading of any ASSERTED WORK (or portion thereof) occurred, DOCUMENTS evidencing
23 such transmission or uploading, and all PERSONS with knowledge of such alleged transmission or
24 uploading.

25 **INTERROGATORY NO. 13:**

26 DESCRIBE all facts supporting YOUR allegation that Meta contributed to the infringement
27 of any ASSERTED WORK, or any portion thereof, including but not limited to the
28 IDENTIFICATION of (a) any THIRD PARTY to whose infringing activity Meta allegedly

1 contributed, (b) all conduct by Meta that allegedly contributed to the infringement of any
2 ASSERTED WORK by such THIRD PARTY, (c) all facts supporting any contention that Meta
3 knew or had reason to know that its conduct materially contributed to such THIRD PARTY's
4 infringement, (d) DOCUMENTS evidencing Meta's alleged contributory infringement, and (e) all
5 PERSONS with knowledge of Meta's alleged contributory infringement.

6 **INTERROGATORY NO. 14:**

7 DESCRIBE all facts supporting YOUR allegation that Meta knew or had reason to know
8 that removal of CMI from any ASSERTED WORK would induce, enable, facilitate, or
9 conceal infringement of such work, including, but not limited to, IDENTIFICATION of the bases
10 of YOUR allegation that removal of CMI conceals training data contents and any prompting of a
11 META AI MODEL that YOU did to support this allegation.

1 Dated: June 18, 2026

2
3 By:/s/ Jessica E. Phillips

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PROOF OF SERVICE

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

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



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

on the following part(ies) in this action:

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

/s/ Jessica E. Phillips
Jessica E. Phillips

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Attorneys for Defendant *Meta Platforms, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC., *et al.*,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

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

**DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF
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: ONE (1)

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendant Meta Platforms, Inc. (“Meta”) requests that Plaintiff Cambronne Inc. (hereinafter, “Cambronne” or “Plaintiff”) answer completely in writing under oath within thirty (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 Cambronne and all its parents, subsidiaries, predecessors, successors, divisions, imprints, and all officers, directors, employees, agents, attorneys, and other persons acting or purporting to act on its behalf.

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

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

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

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

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

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

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

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

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

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

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

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

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

1 attachment or other documents embedded or linked in any way to a requested DOCUMENT.

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

7 16. DESCRIBE means to provide a detailed narrative statement or description of the
8 specific facts or matters to which an Interrogatory refers, including, but not limited to, an
9 identification of all PERSONS, COMMUNICATIONS, acts, transactions, events, agreements,
10 recommendations, and DOCUMENTS used, necessary, or desirable to support such statement or
11 make the description complete.

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

13 (a) With respect to a natural person, provide the person's: (i) full name; (ii) current or
14 last known home address; (iii) current or last known business address; (iv) current or last known
15 email address; (v) current or last known occupation, employer and business position or title; and
16 (vi) current or last known telephone number.

17 (b) With respect to an entity which is not a natural person, provide: (i) the full name of
18 the entity; (ii) the type of entity (e.g., corporation, partnership, sole proprietorship, association);
19 (iii) the name, address and telephone number of its principal place of business; (iv) all names under
20 which it is doing, or has ever done, business; (v) the name(s) of the contact person(s); and (vi) the
21 date or interval when such entity stood in the capacity referenced by the interrogatory.

22 (c) With respect to an event or action, (i) provide the date of the event or action; (ii)
23 state the person(s) present or involved; (iii) state the place or places where the event or action took
24 place.

25 (d) With respect to a DOCUMENT, (i) state the originator, author, addressee, recipient;
26 (ii) DESCRIBE the contents; (iii) state the date of the document; and (iv) IDENTIFY all PERSONS
27 with knowledge of any of the foregoing.

28 (e) With respect to a fact, means to (i) DESCRIBE the fact; (ii) state when it became

1 known to YOU; (iii) IDENTIFY the source from which YOU learned the fact; and (iv) IDENTIFY
2 the DOCUMENTS that record, show or refer to the fact.

3 **INSTRUCTIONS**

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

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

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

15 4. Each Interrogatory shall be answered fully unless it is objected to in good faith, in
16 which event the reasons for YOUR objection shall be stated in detail. If an objection pertains to only
17 a portion of an Interrogatory, or a word, phrase or clause contained within it, YOU are required to
18 state YOUR objection to that portion only and to respond to the remainder of the Interrogatory,
19 using YOUR best efforts to do so. If YOU object based on a purported ambiguity in construing an
20 Interrogatory, or a word, phrase, or clause contained within it, or an Instruction or Definition, such
21 objection shall not serve as a basis for refusing to answer; YOU must set forth in YOUR answer the
22 allegedly ambiguous language and the construction chosen or used to provide a complete response.

23 5. If YOU assert that any information responsive to any Interrogatory is privileged or
24 otherwise protected from discovery, YOU are requested to comply with the requirements of Federal
25 Rule of Civil Procedure 26(b)(5) as to each DOCUMENT, thing, COMMUNICATION or piece of
26 information for which a claim of privilege or protection from discovery is made. For any information
27 withheld on the ground that it is privileged or otherwise protected from discovery, IDENTIFY the
28 information or DOCUMENT, DESCRIBE its subject matter and date, IDENTIFY all authors and

1 all recipients (including copied and blind copied recipients), and specify the basis for the claimed
2 privilege or other grounds of exclusion.

3 6. If YOU answer any of the Interrogatories by reference to records from which the answer
4 may be derived or ascertained, YOU are required to comply with the requirements of Federal Rule of
5 Civil Procedure 33. YOU are requested to comply with the Instructions set forth in Defendant's
6 document requests with respect to any such records produced.

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

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

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

21 INTERROGATORIES

22 **INTERROGATORY NO. 1:**

23 DESCRIBE all facts regarding the PERSONS who had a role, involvement, and/or
24 contribution to the creation of each of the ASSERTED WORKS, including by providing (i) their
25 full name; (ii) contact information; (iii) a description of their role, involvement, or contribution;
26 (iv) how, if at all, they were compensated; and (v) whether there is any agreement with such
27 PERSONS RELATING to the ownership or licensing of the ASSERTED WORKS (e.g.
28 RELATING to sharing of revenue, royalties, ownership interest share, rights conferred, or work for

1 hire agreement(s)).

2 **INTERROGATORY NO. 2:**

3 DESCRIBE all facts regarding all PERSONS (including but not limited to YOU or any
4 publishers or digital or print platforms) who claim or have an ownership interest in the ASSERTED
5 WORKS (whether by assignment, license, or otherwise), including by providing (i) their full name;
6 (ii) contact information; (iii) a description of their ownership interest; and (iv) identification of
7 supporting DOCUMENTS (by Bates number or otherwise).

8 **INTERROGATORY NO. 3:**

9 For each of YOUR ASSERTED WORKS, IDENTIFY each instance in which another
10 PERSON has been licensed, permitted, or authorized to copy, display, distribute, publicly perform,
11 or otherwise exercise any Section 106 rights with respect to each ASSERTED WORK, including
12 by providing the date, PERSON, and agreement regarding each instance.

13 **INTERROGATORY NO. 4:**

14 DESCRIBE all facts regarding when YOU first became aware of Meta's alleged
15 infringement of YOUR ASSERTED WORKS including but not limited to the facts and
16 circumstances surrounding YOUR becoming aware of this alleged infringement and IDENTIFY
17 PERSONS most knowledgeable thereof.

18 **INTERROGATORY NO. 5:**

19 DESCRIBE (including with sufficient IDENTIFICATION) each ASSERTED WORK,
20 including but not limited to identification of its: (a) title; (b) U.S. Copyright Office registration
21 number; (c) registration date; (d) description of the work; (e) author(s); (f) date of first publication
22 of the work; (g) current owner; (h) any chain-of-title agreements establishing YOUR ownership
23 thereof; and (i) the exclusive right allegedly infringed by Meta in connection with YOUR
24 allegations in the ACTION.

25 **INTERROGATORY NO. 6:**

26 For each of the ASSERTED WORKS for which there were contributors (i.e., individuals
27 who wrote any portion of an ASSERTED WORK that YOU claim contains protected expression),
28 DESCRIBE all facts RELATING to the basis on which YOU claim ownership of their

1 contributions, including but not limited to IDENTIFICATION of the contributors and details of
2 any written assignments.

3 **INTERROGATORY NO. 7:**

4 For each ASSERTED WORK, DESCRIBE the date(s) during which the work was made
5 available (either by YOU or with YOUR knowledge or permission) to the public (whether for
6 viewing, displaying, downloading, or other consumption), in whole or in part, without access
7 control or other restrictions (by way of example only, promotional excerpts, full text availability
8 on YOUR website(s), free downloads, etc.), and the reasons why YOU made it available without
9 access control or other restrictions.

10 **INTERROGATORY NO. 8:**

11 DESCRIBE all of the authorized channels through which the ASSERTED WORKS have
12 been made available to the public (whether for download, sale, display, or otherwise) including but
13 not limited to IDENTIFYING all websites (by URL), subscription services (e.g. Kindle) and retail
14 outlets (e.g. bookstores, by name and location) and provide the dates each of the ASSERTED
15 WORKS were first and last available in such channels.

16 **INTERROGATORY NO. 9:**

17 If YOU contend that Meta's alleged use of YOUR ASSERTED WORKS in connection
18 with the research, development, and/or training of any META AI MODEL does not constitute fair
19 use, in whole or in part, because the operation and/or use of any META AI MODEL caused YOU
20 harm, whether to the market or potential market for, or the value of YOUR ASSERTED WORKS,
21 DESCRIBE all facts supporting the complete basis for any such contention, including but not
22 limited to the identity of each ASSERTED WORK whose market YOU contend is harmed, the
23 identity of the purported market for the ASSERTED WORK YOU contend was harmed, each
24 specific operation or use of the META AI MODEL that YOU contend has resulted in such harm,
25 the specific harm YOU contend was caused by that operation or use, and a detailed explanation of
26 how such operation or use of the META AI MODEL purportedly resulted in such harm.

27 **INTERROGATORY NO. 10:**

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1 not limited to any injury, lost sales, lost subscriptions, or lost opportunities, alleged market harm,
2 and/or market dilution) by any META AI MODEL, including but not limited to: (a) any
3 opportunities, subscriptions, or readership allegedly lost because of a META AI MODEL,
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13 who supplied knowledge or information that informed the foregoing.

14 **INTERROGATORY NO. 11:**

15 DESCRIBE YOUR processes, procedures, and/or guidelines for the use of GENERATIVE
16 AI TOOLS by YOUR employees and contractors, including IDENTIFICATION of the PERSONS
17 most knowledgeable about the development and implementation of such processes, procedures,
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20 DESCRIBE all facts supporting YOUR allegation that Meta transmitted or uploaded to any
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25 such transmission or uploading, and all PERSONS with knowledge of such alleged transmission or
26 uploading.

27 **INTERROGATORY NO. 13:**

28 DESCRIBE all facts supporting YOUR allegation that Meta contributed to the infringement

1 of any ASSERTED WORK, or any portion thereof, including but not limited to the
2 IDENTIFICATION of (a) any THIRD PARTY to whose infringing activity Meta allegedly
3 contributed, (b) all conduct by Meta that allegedly contributed to the infringement of any
4 ASSERTED WORK by such THIRD PARTY, (c) all facts supporting any contention that Meta
5 knew or had reason to know that its conduct materially contributed to such THIRD PARTY's
6 infringement, (d) DOCUMENTS evidencing Meta's alleged contributory infringement, and (e) all
7 PERSONS with knowledge of Meta's alleged contributory infringement.

8 **INTERROGATORY No. 14:**

9 DESCRIBE all facts supporting YOUR allegation that Meta knew or had reason to know
10 that removal of CMI from any ASSERTED WORK would induce, enable, facilitate, or
11 conceal infringement of such work, including, but not limited to, IDENTIFICATION of the bases
12 of YOUR allegation that removal of CMI conceals training data contents and any prompting of a
13 META AI MODEL that YOU did to support this allegation.

1 Dated: June 18, 2026

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3 By:/s/ Jessica E. Phillips

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Attorneys for Defendant *Meta Platforms, Inc.*

PROOF OF SERVICE

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

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



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

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

/s/ Jessica E. Phillips
Jessica E. Phillips

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Attorneys for Defendant *Meta Platforms, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC., *et al.*,

Plaintiffs,

v.
META PLATFORMS, INC.,

Defendant.

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

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

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

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

2 **RESPONDING PARTY: PLAINTIFF LISA BARRETTA**

3 **SET NUMBER: ONE (1)**

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

8 **DEFINITIONS**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

6 16. DESCRIBE means to provide a detailed narrative statement or description of the
7 specific facts or matters to which an Interrogatory refers, including, but not limited to, an
8 identification of all PERSONS, COMMUNICATIONS, acts, transactions, events, agreements,
9 recommendations, and DOCUMENTS used, necessary, or desirable to support such statement or
10 make the description complete.

11 17. IDENTIFY (and variations thereof) means the following:

12 (a) With respect to a natural person, provide the person's: (i) full name; (ii)
13 current or last known home address; (iii) current or last known business address; (iv) current or last
14 known email address; (v) current or last known occupation, employer and business position or title;
15 and (vi) current or last known telephone number.

16 (b) With respect to an entity which is not a natural person, provide: (i) the full name of
17 the entity; (ii) the type of entity (e.g., corporation, partnership, sole proprietorship, association);
18 (iii) the name, address and telephone number of its principal place of business; (iv) all names under
19 which it is doing, or has ever done, business; (v) the name(s) of the contact person(s); and (vi) the
20 date or interval when such entity stood in the capacity referenced by the interrogatory.

21 (c) With respect to an event or action, (i) provide the date of the event or action; (ii) state
22 the person(s) present or involved; (iii) state the place or places where the event or action took place.

23 (d) With respect to a DOCUMENT, (i) state the originator, author, addressee, recipient;
24 (ii) DESCRIBE the contents; (iii) state the date of the DOCUMENT; and (iv) IDENTIFY all
25 PERSONS with knowledge of any of the foregoing.

26 (e) With respect to a fact, means to (i) DESCRIBE the fact; (ii) state when it became
27 known to YOU; (iii) IDENTIFY the source from which YOU learned the fact; and (iv) IDENTIFY
28 the DOCUMENTS that record, show or refer to the fact.

INSTRUCTIONS

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

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

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

13 4. Each Interrogatory shall be answered fully unless it is objected to in good faith, in
14 which event the reasons for YOUR objection shall be stated in detail. If an objection pertains to only
15 a portion of an Interrogatory, or a word, phrase or clause contained within it, YOU are required to
16 state YOUR objection to that portion only and to respond to the remainder of the Interrogatory,
17 using YOUR best efforts to do so. If YOU object based on a purported ambiguity in construing an
18 Interrogatory, or a word, phrase, or clause contained within it, or an Instruction or Definition, such
19 objection shall not serve as a basis for refusing to answer; YOU must set forth in YOUR answer the
20 allegedly ambiguous language and the construction chosen or used to provide a complete response.

21 5. If YOU assert that any information responsive to any Interrogatory is privileged or
22 otherwise protected from discovery, YOU are requested to comply with the requirements of Federal
23 Rule of Civil Procedure 26(b)(5) as to each DOCUMENT, thing, COMMUNICATION or piece of
24 information for which a claim of privilege or protection from discovery is made. For any information
25 withheld on the ground that it is privileged or otherwise protected from discovery, IDENTIFY the
26 information or DOCUMENT, DESCRIBE its subject matter and date, IDENTIFY all authors and
27 all recipients (including copied and blind copied recipients), and specify the basis for the claimed
28 privilege or other grounds of exclusion.

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

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

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

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

INTERROGATORIES

INTERROGATORY NO. 1:

DESCRIBE all facts regarding the PERSONS who had a role, involvement, and/or contribution to the creation of each of the ASSERTED WORKS, including by providing (i) their full name; (ii) contact information; (iii) a description of their role, involvement, or contribution; (iv) how, if at all, they were compensated; and (v) whether there is any agreement with such PERSONS RELATING to the ownership or licensing of the ASSERTED WORKS (e.g. RELATING to sharing of revenue, royalties, ownership interest share, rights conferred, or work for hire agreement(s)).

INTERROGATORY NO. 2:

1 DESCRIBE all facts regarding all PERSONS (including but not limited to YOU or any
2 publishers or digital or print platforms) who claim or have an ownership interest in the ASSERTED
3 WORKS (whether by assignment, license, or otherwise), including by providing (i) their full name;
4 (ii) contact information; (iii) a description of their ownership interest; and (iv) identification of
5 supporting DOCUMENTS (by Bates number or otherwise).

6 **INTERROGATORY NO. 3:**

7 For each of YOUR ASSERTED WORKS, IDENTIFY each instance in which another
8 PERSON has been licensed, permitted, or authorized to copy, display, distribute, publicly perform,
9 or otherwise exercise any Section 106 rights with respect to each ASSERTED WORK, including
10 by providing the date, PERSON, and agreement regarding each instance.

11 **INTERROGATORY NO. 4:**

12 DESCRIBE all facts regarding when YOU first became aware of Meta's alleged
13 infringement of YOUR ASSERTED WORKS including but not limited to the facts and
14 circumstances surrounding YOUR becoming aware of this alleged infringement and IDENTIFY
15 PERSONS most knowledgeable thereof.

16 **INTERROGATORY NO. 5:**

17 DESCRIBE (including with sufficient IDENTIFICATION) each ASSERTED WORK,
18 including but not limited to identification of its: (a) title; (b) U.S. Copyright Office registration
19 number; (c) registration date; (d) description of the work; (e) author(s); (f) date of first publication
20 of the work; (g) current owner; (h) any chain-of-title agreements establishing YOUR ownership
21 thereof; and (i) the exclusive right allegedly infringed by Meta in connection with YOUR
22 allegations in the ACTION.

23 **INTERROGATORY NO. 6:**

24 For each of the ASSERTED WORKS for which there were contributors (i.e., individuals
25 who wrote any portion of an ASSERTED WORK that YOU claim contains protected expression),
26 DESCRIBE all facts RELATING to the basis on which YOU claim ownership of their
27 contributions, including but not limited to IDENTIFICATION of the contributors and details of
28 any written assignments.

INTERROGATORY NO. 7:

For each ASSERTED WORK, DESCRIBE the date(s) during which the work was made available (either by YOU or with YOUR knowledge or permission) to the public (whether for viewing, displaying, downloading, or other consumption), in whole or in part, without access control or other restrictions (by way of example only, promotional excerpts, full text availability on YOUR website(s), free downloads, etc.), and the reasons why YOU made it available without access control or other restrictions.

INTERROGATORY NO. 8:

DESCRIBE all of the authorized channels through which the ASSERTED WORKS have been made available to the public (whether for download, sale, display, or otherwise) including but not limited to IDENTIFYING all websites (by URL), subscription services (e.g. Kindle) and retail outlets (e.g. bookstores, by name and location) and provide the dates each of the ASSERTED WORKS were first and last available in such channels.

INTERROGATORY NO. 9:

If YOU contend that Meta's alleged use of YOUR ASSERTED WORKS in connection with the research, development, and/or training of any META AI MODEL does not constitute fair use, in whole or in part, because the operation and/or use of any META AI MODEL caused YOU harm, whether to the market or potential market for, or the value of YOUR ASSERTED WORKS, DESCRIBE all facts supporting the complete basis for any such contention, including but not limited to the IDENTITY of each ASSERTED WORK whose market YOU contend is harmed, the identity of the purported market for the ASSERTED WORK YOU contend was harmed, each specific operation or use of the META AI MODEL that YOU contend has resulted in such harm, the specific harm YOU contend was caused by that operation or use, and a detailed explanation of how such operation or use of the META AI MODEL purportedly resulted in such harm.

INTERROGATORY NO. 10:

DESCRIBE all facts supporting YOUR allegations that YOU were harmed (including but not limited to any injury, lost sales, lost subscriptions, or lost opportunities, alleged market harm, and/or market dilution) by any META AI MODEL, including but not limited to: (a) any

1 opportunities, subscriptions, or readership allegedly lost because of a META AI MODEL,
2 including but not limited to any specific customers or licensing opportunities or subscriptions lost,
3 and any sales channels affected; (b) the factual basis for YOUR contention that a causal connection
4 between YOUR alleged harm and a META AI MODEL exists; (c) economic or statistical methods
5 YOU used to evaluate that harm; (d) any additional, alternative or contributory factors YOU
6 evaluated in considering the reasons for that alleged harm (e.g., macroeconomic shifts, non-Meta
7 AI models or tools, the availability of similar content online, shifting market dynamics, pricing, or
8 competition); and (e) YOUR quantification of such harm including corresponding financial figures,
9 readership data, subscription data, or other DOCUMENTS used or referenced as the basis for
10 computing such harm, the methodology used by YOU to compute such harm, and all PERSONS
11 who supplied knowledge or information that informed the foregoing.

12 **INTERROGATORY NO. 11:**

13 DESCRIBE YOUR processes, procedures, and/or guidelines for the use of GENERATIVE
14 AI TOOLS by YOUR employees and contractors, including IDENTIFICATION of the PERSONS
15 most knowledgeable about the development and implementation of such processes, procedures,
16 and/or guidelines.

17 **INTERROGATORY NO. 12:**

18 DESCRIBE all facts supporting YOUR allegation that Meta transmitted or uploaded to any
19 THIRD PARTY any ASSERTED WORK, or any portion thereof, during TORRENTING,
20 including but not limited to the IDENTIFICATION of any THIRD PARTIES who received any
21 ASSERTED WORK (or portion thereof) from Meta, all details of how the alleged transmission or
22 uploading of any ASSERTED WORK (or portion thereof) occurred, DOCUMENTS evidencing
23 such transmission or uploading, and all PERSONS with knowledge of such alleged transmission or
24 uploading.

25 **INTERROGATORY NO. 13:**

26 DESCRIBE all facts supporting YOUR allegation that Meta contributed to the infringement
27 of any ASSERTED WORK, or any portion thereof, including but not limited to the
28 IDENTIFICATION of (a) any THIRD PARTY to whose infringing activity Meta allegedly

1 contributed, (b) all conduct by Meta that allegedly contributed to the infringement of any
2 ASSERTED WORK by such THIRD PARTY, (c) all facts supporting any contention that Meta
3 knew or had reason to know that its conduct materially contributed to such THIRD PARTY's
4 infringement, (d) DOCUMENTS evidencing Meta's alleged contributory infringement, and (e) all
5 PERSONS with knowledge of Meta's alleged contributory infringement.

6 **INTERROGATORY NO. 14:**

7 DESCRIBE all facts supporting YOUR allegation that Meta knew or had reason to know
8 that removal of CMI from any ASSERTED WORK would induce, enable, facilitate, or
9 conceal infringement of such work, including, but not limited to, IDENTIFICATION of the bases
10 of YOUR allegation that removal of CMI conceals training data contents and any prompting of a
11 META AI MODEL that YOU did to support this allegation.

1 Dated: June 18, 2026

2
3 By:/s/ Jessica E. Phillips

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Attorneys for Defendant *Meta Platforms, Inc.*

PROOF OF SERVICE

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

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



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

on the following part(ies) in this action:

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Lauren Martin (SBN 294367)
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Executed on June 18, 2026, at Washington, D.C.

/s/ Jessica E. Phillips
Jessica E. Phillips

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Attorneys for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAMBRONNE INC., *et al.*,

Plaintiffs,

v.
META PLATFORMS, INC.,

Defendant.

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

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

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

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

2 **RESPONDING PARTY: PLAINTIFF MATTHEW SACKS**

3 **SET NUMBER: ONE (1)**

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

8 **DEFINITIONS**

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

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

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

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21 diffusion models), including but not limited to ChatGPT, Gemini, Claude, Meta.AI, and Llama—
22 including any and all versions or models thereof—and any internal or proprietary system, tool, or
23 platform with any such capabilities.

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26 for any ASSERTED WORK.

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

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

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

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

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

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

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

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

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

6 16. DESCRIBE means to provide a detailed narrative statement or description of the
7 specific facts or matters to which an Interrogatory refers, including, but not limited to, an
8 identification of all PERSONS, COMMUNICATIONS, acts, transactions, events, agreements,
9 recommendations, and DOCUMENTS used, necessary, or desirable to support such statement or
10 make the description complete.

11 17. IDENTIFY (and variations thereof) means the following:

12 (a) With respect to a natural person, provide the person's: (i) full name; (ii)
13 current or last known home address; (iii) current or last known business address; (iv) current or last
14 known email address; (v) current or last known occupation, employer and business position or title;
15 and (vi) current or last known telephone number.

16 (b) With respect to an entity which is not a natural person, provide: (i) the full name of
17 the entity; (ii) the type of entity (e.g., corporation, partnership, sole proprietorship, association);
18 (iii) the name, address and telephone number of its principal place of business; (iv) all names under
19 which it is doing, or has ever done, business; (v) the name(s) of the contact person(s); and (vi) the
20 date or interval when such entity stood in the capacity referenced by the interrogatory.

21 (c) With respect to an event or action, (i) provide the date of the event or action; (ii) state
22 the person(s) present or involved; (iii) state the place or places where the event or action took place.

23 (d) With respect to a DOCUMENT, (i) state the originator, author, addressee, recipient;
24 (ii) DESCRIBE the contents; (iii) state the date of the DOCUMENT; and (iv) IDENTIFY all
25 PERSONS with knowledge of any of the foregoing.

26 (e) With respect to a fact, means to (i) DESCRIBE the fact; (ii) state when it became
27 known to YOU; (iii) IDENTIFY the source from which YOU learned the fact; and (iv) IDENTIFY
28 the DOCUMENTS that record, show or refer to the fact.

INSTRUCTIONS

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

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

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

13 4. Each Interrogatory shall be answered fully unless it is objected to in good faith, in
14 which event the reasons for YOUR objection shall be stated in detail. If an objection pertains to only
15 a portion of an Interrogatory, or a word, phrase or clause contained within it, YOU are required to
16 state YOUR objection to that portion only and to respond to the remainder of the Interrogatory,
17 using YOUR best efforts to do so. If YOU object based on a purported ambiguity in construing an
18 Interrogatory, or a word, phrase, or clause contained within it, or an Instruction or Definition, such
19 objection shall not serve as a basis for refusing to answer; YOU must set forth in YOUR answer the
20 allegedly ambiguous language and the construction chosen or used to provide a complete response.

21 5. If YOU assert that any information responsive to any Interrogatory is privileged or
22 otherwise protected from discovery, YOU are requested to comply with the requirements of Federal
23 Rule of Civil Procedure 26(b)(5) as to each DOCUMENT, thing, COMMUNICATION or piece of
24 information for which a claim of privilege or protection from discovery is made. For any information
25 withheld on the ground that it is privileged or otherwise protected from discovery, IDENTIFY the
26 information or DOCUMENT, DESCRIBE its subject matter and date, IDENTIFY all authors and
27 all recipients (including copied and blind copied recipients), and specify the basis for the claimed
28 privilege or other grounds of exclusion.

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

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

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

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

INTERROGATORIES

INTERROGATORY NO. 1:

DESCRIBE all facts regarding the PERSONS who had a role, involvement, and/or contribution to the creation of each of the ASSERTED WORKS, including by providing (i) their full name; (ii) contact information; (iii) a description of their role, involvement, or contribution; (iv) how, if at all, they were compensated; and (v) whether there is any agreement with such PERSONS RELATING to the ownership or licensing of the ASSERTED WORKS (e.g. RELATING to sharing of revenue, royalties, ownership interest share, rights conferred, or work for hire agreement(s)).

INTERROGATORY NO. 2:

1 DESCRIBE all facts regarding all PERSONS (including but not limited to YOU or any
2 publishers or digital or print platforms) who claim or have an ownership interest in the ASSERTED
3 WORKS (whether by assignment, license, or otherwise), including by providing (i) their full name;
4 (ii) contact information; (iii) a description of their ownership interest; and (iv) identification of
5 supporting DOCUMENTS (by Bates number or otherwise).

6 **INTERROGATORY NO. 3:**

7 For each of YOUR ASSERTED WORKS, IDENTIFY each instance in which another
8 PERSON has been licensed, permitted, or authorized to copy, display, distribute, publicly perform,
9 or otherwise exercise any Section 106 rights with respect to each ASSERTED WORK, including
10 by providing the date, PERSON, and agreement regarding each instance.

11 **INTERROGATORY NO. 4:**

12 DESCRIBE all facts regarding when YOU first became aware of Meta's alleged
13 infringement of YOUR ASSERTED WORKS including but not limited to the facts and
14 circumstances surrounding YOUR becoming aware of this alleged infringement and IDENTIFY
15 PERSONS most knowledgeable thereof.

16 **INTERROGATORY NO. 5:**

17 DESCRIBE (including with sufficient IDENTIFICATION) each ASSERTED WORK,
18 including but not limited to identification of its: (a) title; (b) U.S. Copyright Office registration
19 number; (c) registration date; (d) description of the work; (e) author(s); (f) date of first publication
20 of the work; (g) current owner; (h) any chain-of-title agreements establishing YOUR ownership
21 thereof; and (i) the exclusive right allegedly infringed by Meta in connection with YOUR
22 allegations in the ACTION.

23 **INTERROGATORY NO. 6:**

24 For each of the ASSERTED WORKS for which there were contributors (i.e., individuals
25 who wrote any portion of an ASSERTED WORK that YOU claim contains protected expression),
26 DESCRIBE all facts RELATING to the basis on which YOU claim ownership of their
27 contributions, including but not limited to IDENTIFICATION of the contributors and details of
28 any written assignments.

INTERROGATORY NO. 7:

For each ASSERTED WORK, DESCRIBE the date(s) during which the work was made available (either by YOU or with YOUR knowledge or permission) to the public (whether for viewing, displaying, downloading, or other consumption), in whole or in part, without access control or other restrictions (by way of example only, promotional excerpts, full text availability on YOUR website(s), free downloads, etc.), and the reasons why YOU made it available without access control or other restrictions.

INTERROGATORY NO. 8:

DESCRIBE all of the authorized channels through which the ASSERTED WORKS have been made available to the public (whether for download, sale, display, or otherwise) including but not limited to IDENTIFYING all websites (by URL), subscription services (e.g. Kindle) and retail outlets (e.g. bookstores, by name and location) and provide the dates each of the ASSERTED WORKS were first and last available in such channels.

INTERROGATORY NO. 9:

If YOU contend that Meta's alleged use of YOUR ASSERTED WORKS in connection with the research, development, and/or training of any META AI MODEL does not constitute fair use, in whole or in part, because the operation and/or use of any META AI MODEL caused YOU harm, whether to the market or potential market for, or the value of YOUR ASSERTED WORKS, DESCRIBE all facts supporting the complete basis for any such contention, including but not limited to the identity of each ASSERTED WORK whose market YOU contend is harmed, the identity of the purported market for the ASSERTED WORK YOU contend was harmed, each specific operation or use of the META AI MODEL that YOU contend has resulted in such harm, the specific harm YOU contend was caused by that operation or use, and a detailed explanation of how such operation or use of the META AI MODEL purportedly resulted in such harm.

INTERROGATORY NO. 10:

DESCRIBE all facts supporting YOUR allegations that YOU were harmed (including but not limited to any injury, lost sales, lost subscriptions, or lost opportunities, alleged market harm, and/or market dilution) by any META AI MODEL, including but not limited to: (a) any

opportunities, subscriptions, or readership allegedly lost because of a META AI MODEL, including but not limited to any specific customers or licensing opportunities or subscriptions lost, and any sales channels affected; (b) the factual basis for YOUR contention that a causal connection between YOUR alleged harm and a META AI MODEL exists; (c) economic or statistical methods YOU used to evaluate that harm; (d) any additional, alternative or contributory factors YOU evaluated in considering the reasons for that alleged harm (e.g., macroeconomic shifts, non-Meta AI models or tools, the availability of similar content online, shifting market dynamics, pricing, or competition); and (e) YOUR quantification of such harm including corresponding financial figures, readership data, subscription data, or other DOCUMENTS used or referenced as the basis for computing such harm, the methodology used by YOU to compute such harm, and all PERSONS who supplied knowledge or information that informed the foregoing.

INTERROGATORY NO. 11:

DESCRIBE YOUR processes, procedures, and/or guidelines for the use of GENERATIVE AI TOOLS by YOUR employees and contractors, including IDENTIFICATION of the PERSONS most knowledgeable about the development and implementation of such processes, procedures, and/or guidelines.

INTERROGATORY NO. 12:

DESCRIBE all facts supporting YOUR allegation that Meta transmitted or uploaded to any THIRD PARTY any ASSERTED WORK, or any portion thereof, during TORRENTING, including but not limited to the IDENTIFICATION of any THIRD PARTIES who received any ASSERTED WORK (or portion thereof) from Meta, all details of how the alleged transmission or uploading of any ASSERTED WORK (or portion thereof) occurred, DOCUMENTS evidencing such transmission or uploading, and all PERSONS with knowledge of such alleged transmission or uploading.

INTERROGATORY NO. 13:

DESCRIBE all facts supporting YOUR allegation that Meta contributed to the infringement of any ASSERTED WORK, or any portion thereof, including but not limited to the IDENTIFICATION of (a) any THIRD PARTY to whose infringing activity Meta allegedly

1 contributed, (b) all conduct by Meta that allegedly contributed to the infringement of any
2 ASSERTED WORK by such THIRD PARTY, (c) all facts supporting any contention that Meta
3 knew or had reason to know that its conduct materially contributed to such THIRD PARTY's
4 infringement, (d) DOCUMENTS evidencing Meta's alleged contributory infringement, and (e) all
5 PERSONS with knowledge of Meta's alleged contributory infringement.

6 **INTERROGATORY NO. 14:**

7 DESCRIBE all facts supporting YOUR allegation that Meta knew or had reason to know
8 that removal of CMI from any ASSERTED WORK would induce, enable, facilitate, or
9 conceal infringement of such work, including, but not limited to, IDENTIFICATION of the bases
10 of YOUR allegation that removal of CMI conceals training data contents and any prompting of a
11 META AI MODEL that YOU did to support this allegation.

1 Dated: June 18, 2026

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3 By:/s/ Jessica E. Phillips

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PROOF OF SERVICE

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

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



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

on the following part(ies) in this action:

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

/s/ Jessica E. Phillips
Jessica E. Phillips