

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF THE ADMINISTRATIVE LAW JUDGES

In the Matter of)	
)	
Meta Platforms, Inc., et al.)	Docket No. 9411
)	
Respondents.)	PUBLIC
)	
)	

RESPONDENT META’S MOTION FOR *IN CAMERA* TREATMENT

Pursuant to FTC Rule 3.45, respondent Meta Platforms, Inc. (“Meta”) respectfully moves this Court for *in camera* treatment of the potential trial exhibits identified in Exhibit A.¹ In light of the strict standards for sealing in this matter, Meta has limited its request for *in camera* treatment to only those documents, portions of documents, or data within the exhibits that contain competitively sensitive, confidential, and nonpublic information. As explained below, and in the accompanying declaration of Barbara Blank, Director & Associate General Counsel, Competition & Regulatory, at Meta (“Blank Declaration”), the public disclosure of this information would “likely result in a clearly defined, serious injury” to Meta, as well as some third parties. 16 C.F.R. § 3.45(b). Accordingly, Meta respectfully requests that the Court grant this motion.

¹ Under the Scheduling Order, Respondents’ exhibit lists are not due until December 30, 2022. However, Respondents anticipate that their exhibit list in this proceeding will be substantially similar to Meta’s exhibit list in the preliminary injunction proceeding in federal court *FTC v. Meta Platforms, Inc.*, No. 5:22-cv-04325-EJD (N.D. Cal. July 7, 2022). Respondents accordingly move for *in camera* treatment of certain materials on their exhibit list from the federal court proceeding. Respondents reserve the right to seek *in camera* treatment of any additional materials included on their exhibit list in this proceeding.

I. Legal Standard

In camera treatment is appropriate where “public disclosure will likely result in a clearly defined, serious injury to the person, partnership, or corporation” requesting such treatment. 16 C.F.R. § 3.45(b). “The likely loss of business advantage is a good example of a ‘clearly defined, serious injury.’” *In re Dura Lube Corp.*, 1999 FTC LEXIS 255, at *7 (Dec. 23, 1999) (Chappell, J.) (citation omitted). In addition, *in camera* review is appropriate for business records “such as customer names, pricing to customers, business costs and profits, as well as business plans, marketing plans, or sales documents.” *In re 1-800 Contacts, Inc.*, 2017 FTC LEXIS 55, at *5-6 (Apr. 4, 2017) (Chappell, J.).

II. Argument

Certain potential exhibits in this matter contain highly confidential and business sensitive information that, if made publicly available, would cause significant harm to Meta, its users, and third parties. The chart below identifies the categories of information for which Meta seeks *in camera* treatment, which are explained further below and in the Blank Declaration.

Category	Blank Declaration	Period of Time for <i>In Camera</i> Treatment
Forward-Looking Analyses	¶ 7	Five Years
Non-Public Financial Information	¶ 8	Five Years
Non-Public User Data	¶ 9	Five Years
Other Commercially Sensitive Information	¶ 10	Five Years

A. Category 1 – Forward-Looking Analyses

The documents in this category include Meta’s forward-looking strategic analysis of both specific business opportunities—from partnerships to internal development projects—as well as its general proprietary business strategy. Blank Decl. ¶ 7.a. For example, this category covers discussions of Meta’s non-public plans for new content in virtual reality (“VR”) and augmented

reality (“AR”) developed by both Meta internal teams and third parties. *Id.* This strategic information is extremely competitively sensitive. *Id.* If publicly disclosed, Meta’s actual and potential competitors could replicate this content before Meta has finished developing it. *Id.* at ¶ 7.c. Meta assiduously guards the materials covered by this category; it does not share the materials widely within the company, and the company has taken steps to protect disclosure in *FTC v. Meta Platforms, Inc.*, the preliminary injunction proceeding related to its acquisition of Within Unlimited, Inc. (“the Transaction”). *Id.* at ¶ 7.b.

This Court has routinely sealed similar forward-looking, strategic materials. *See, e.g., In re Altria Group*, Docket No. 9393, 2021 WL 2258803, at *5 (F.T.C. May 19, 2021) (Chappell, J.) (granting five year *in camera* treatment to “documents . . . contain[ing] information on strategic initiatives”); *In re McWane, Inc.*, 2012 FTC LEXIS 143, at *21-23 (Aug. 17, 2012) (Chappell, J.) (granting *in camera* treatment for five years to material revealing “internal business strategies and principles and policies”); *In re North Texas Specialty Physicians*, 2004 FTC LEXIS 109, at *12-14 (Apr. 23, 2004) (Chappell, J.) (granting *in camera* treatment for five years to material “reflecting confidential . . . strategic planning”). Thus, this material merits protection by *in camera* treatment for no less than five years.

B. Category 2 – Non-Public Financial Information

The documents in this category include non-public financial information, including information pertaining to Meta’s finances and financial relationships with third parties. Blank Decl. ¶ 8.a. These documents provide a detailed view of revenue from specific VR applications, internal financial priorities, and investments in third parties. *Id.* This information is competitively sensitive, and its public disclosure would cause harm to Meta. For instance, public disclosure of Meta’s financial relationship with certain third parties would undercut Meta’s ability to negotiate with other third parties. *Id.* at ¶ 8.c. This information could also be used by Meta’s actual and

potential competitors to gain insight into Meta’s proprietary business strategy. *Id.* For this reason, Meta takes steps to protect this information in the ordinary course of business: it is not disseminated widely within Meta, and it has been sealed in *FTC v. Meta Platforms, Inc.* *Id.* at ¶ 8.b.

This Court has routinely sealed this type of information on business costs and profits. *See, e.g., McWane, Inc.*, 2012 FTC LEXIS, at *11-12 (granting *in camera* treatment for five years to documents reflecting sales and payment information); *North Texas Specialty Physicians*, 2004 FTC LEXIS, at *12-14 (granting five year *in camera* treatment to material “reflecting confidential . . . internal cost and pricing analyses”); *In re Champion Spark Plug Co.*, 1982 FTC LEXIS 85, at *1, 4 (Apr. 5, 1982) (granting *in camera* protection for five years to documents disclosing “unit and dollar sales by product line”). This material warrants protection by *in camera* treatment for no less than five years.

C. Category 3 – Non-Public User Data

The documents in this category include non-public user data, including usage metrics for VR applications from Meta and third parties. Blank Decl. ¶ 9.a. This data provides detailed insight into the competitively sensitive usage patterns and preferences of consumers. *Id.* This material is proprietary and informs Meta’s strategic analysis. As a result, the public disclosure of this data would provide Meta’s actual and potential competitors with unfair access to Meta’s proprietary information. *Id.* at ¶ 9.c. Meta carefully safeguards this material: it is not shared widely within Meta, and it is protected from disclosure in *FTC v. Meta Platforms, Inc.* *Id.* at ¶ 9.b.

Usage data relating to VR apps warrants sealing under this Court’s precedent. *See, e.g., 1-800 Contacts, Inc.*, 2017 FTC LEXIS, at *15-16 (Apr. 4, 2012) (granting *in camera* treatment for five years to datasets containing, *inter alia*, click-through rates). This material should be afforded protection through *in camera* treatment for a period of at least five years. *Id.*

D. Category 4 – Other Commercially Sensitive Information

The documents in this category consist of other commercially sensitive information, including analyses of third parties and Meta’s broader business strategy. Blank Decl. ¶ 10.a. This information is competitively sensitive, and disclosure would disadvantage Meta because it would provide Meta’s actual and potential competitors with unfair access to Meta’s proprietary strategy. *Id.*, at ¶ 10.c. Meta takes great care to guard this information: it is not shared widely within the company, and it is subject to protective measures in *FTC v. Meta Platforms, Inc.* *Id.* at ¶ 10.b.

This Court routinely grants *in camera* treatment for competitive analyses and related strategies. *See, e.g., In re Coca-Cola Co.*, 1990 FTC LEXIS 364, at *2, 8 (Oct. 17, 1990) (granting indefinite *in camera* treatment to documents “reveal[ing] market research”); *McWane, Inc.*, 2012 FTC LEXIS 143, at *19-23 (granting five years of *in camera* treatment to materials containing “strategic planning and market share information”). Accordingly, proper protection of these materials requires *in camera* treatment for no fewer than five years.

III. Conclusion

Given the significant risk that public disclosure of these materials would cause serious injury to Meta’s business and commercial interests, Meta respectfully requests an *in camera* order to protect these documents and data from public disclosure.

Dated: December 23, 2022

Respectfully submitted,

/s/ Chantale Fiebig

Chantale Fiebig, Esq.
Michael Moiseyev, Esq.
WEIL, GOTSHAL & MANGES LLP
2001 M Street NW, Suite 600
Washington, D.C. 20036
Telephone No.: (202) 682-7235
Facsimile No.: (202) 857-0940
Chantale.Fiebig@weil.com
Michael.Moiseyev@weil.com

Eric Hochstadt, Esq.
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, NY 10153
Telephone No.: (212) 310-8000
Facsimile No.: (212) 310-8007
Eric.Hochstadt@weil.com

Liz Ryan, Esq.
liz.ryan@weil.com
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, TX 75201
Telephone: (214) 746-7700
Facsimile: (214) 746-7777

Bambo Obaro, Esq.
WEIL, GOTSHAL & MANGES LLP
201 Redwood Shores Parkway, 6th
Floor
Redwood Shores, CA 94065-1134
Telephone No.: (650) 802-3000
Facsimile No.: (650) 802-3100
bambo.obaro@weil.com

***Counsel for Respondent Meta
Platforms, Inc.***

Mark C. Hansen, Esq.
Geoffrey M. Klineberg, Esq.
Aaron M. Panner, Esq.
KELLOGG, HANSEN, TODD, FIGEL &
FREDERICK, P.L.L.C.
1615 M Street, N.W., Suite 400
Washington, D.C. 20036
Telephone No.: (202) 326-7900
Facsimile No.: (202) 326-7999
mhansen@kellogghansen.com
gklineberg@kellogghansen.com
apanner@kellogghansen.com

*Counsel for Respondents Meta
Platforms, Inc. and Mark
Zuckerberg*

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF THE ADMINISTRATIVE LAW JUDGES

_____)	
In the Matter of)	
)	
Meta Platforms, Inc.,)	
a corporation,)	
)	Docket No. 9411
Mark Zuckerberg,)	
a natural person,)	PUBLIC
)	
and)	
)	
Within Unlimited, Inc.,)	
a corporation.)	
_____)	

[Proposed] ORDER GRANTING *IN CAMERA* TREATMENT

Having considered Respondent Meta Platform, Inc.’s Motion for In Camera Treatment, it is HEREBY ORDERED that the motion is GRANTED.

ORDERED.

D. Michael Chappell
Chief Administrative Law Judge

Date: _____, 2022.

CERTIFICATE OF SERVICE

I hereby certify that, on December 23, 2022, I caused the foregoing document to be electronically filed with the Secretary of the Commission using the Federal Trade Commission's e-filing system, and I also served the document via email on the individuals listed below.

April J. Tabor
Secretary of the Federal Trade Commission
FEDERAL TRADE COMMISSION
600 Pennsylvania Ave., NW, Rm. H-113
Washington, D.C. 20580
ElectronicFilings@ftc.gov

The Honorable D. Michael Chappell
Administrative Law Judge
FEDERAL TRADE COMMISSION
600 Pennsylvania Ave., NW, Rm. H-110
Washington, D.C. 205080

Abby Dennis
Peggy Bayer Femenella
Jeanine Balbach
Michael Barnett
E. Eric Elmore

90 7th Street, Suite 14-300
San Francisco, CA 94103
Tel: (415) 848-5190
Email: ewodinsky@ftc.gov

Justin Epner
Joshua Goodman
Sean D. Hughto
Frances Anne Johnson
Andrew Lowdon
Lincoln Mayer
Kristian Rogers
Anthony R. Saunders
Timothy Singer
adennis@ftc.gov
pbayer@ftc.gov
jbalbach@ftc.gov
mbarnett@ftc.gov
eelmore@ftc.gov
jepner@ftc.gov
jgoodman@ftc.gov
shughto@ftc.gov
fjohnson@ftc.gov
alowdon@ftc.gov
lmayer@ftc.gov
krogers@ftc.gov
asaunders@ftc.gov
tsinger@ftc.gov

Counsel Supporting the Complaint

Charles A. Loughlin, Esq.
Benjamin Holt, Esq.
Lauren Battaglia, Esq.
Logan M. Breed, Esq.
HOGAN LOVELLS US LLP
Columbia Square, 555 Thirteenth St., NW
Washington, D.C. 20004
Telephone No.: (202) 637-5600
Facsimile No.: (202) 637-5910
lauren.battaglia@hoganlovells.com
logan.breed@hoganlovells.com
benjamin.holt@hoganlovells.com
chuck.loughlin@hoganlovells.com

FEDERAL TRADE COMMISSION
600 Pennsylvania Avenue, NW
Washington, DC 20580
Tel: (202) 326-2381
Erika Wodinsky
FEDERAL TRADE COMMISSION

Counsel for Respondent Within Unlimited, Inc.

CERTIFICATE FOR ELECTRONIC FILING

I certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the original filing, and that I possess a paper original of the signed document that is available for review by the parties and the adjudicator.

/s/ Luke Sullivan

Luke Sullivan

Exhibit A

Exhibit A: Chart to Respondents' Motion for In Camera Review of Confidential Docs

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0002	Meta HSR Item 4(c)-5	10/29/2021	PX0002-001	PX0002-005	Non-Public Financial Information	Pages 1-3, 5	Partial	Five Years
PX0101	Document: Fitness as an Oculus product priority	8/10/2021	META-E-2R-01338819	META-E-2R-01338835	Forward-Looking Analyses	Pages 2, 4, 12,	Partial	Five Years
PX0103	Email from Mark Zuckerberg to Andrew Bosworth, Michael Verdu, and Mark Rabkin re: Onward	3/4/2021	META-E-2R-01746316	META-E-2R-01746317	Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0113	Spreadsheet: VR Workstreams	3/5/2021	META-E-2R-00390156	META-E-2R-00390156	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0118	Email from Mark Rabkin to Jane Chiao re: Onward	3/4/2021	META-E-2R-01302798	META-E-2R-01302799	Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0123	Messages between Nir Blumberger, Vishal Shah, and Jason Rubin on September 15, 2021	9/15/2021	META-E-2R-04354174	META-E-2R-04354175	Other Commercially Sensitive Information	Pages 1-2	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0125	Document: VR Fitness 2.0 strategy	6/2/2021	META-E-2R-01341743	META-E-2R-01341751	Non-Public User Data	Page 9	Partial	Five Years
PX0127	Document: VR Fitness Content Investment Thesis v2	3/10/2021	META-E-2R-04865217	META-E-2R-04865230	Non-Public User Data	Pages 8-9, 11-14	Partial	Five Years
PX0135	Document: Oculus Leads Meeting Notes (May 13, 2021)	5/13/2021	META-E-2R-01341894	META-E-2R-01341902	Forward-Looking Analyses	Pages 3-5	Partial	Five Years
PX0136	Email from Stephanie Young to Mark Zuckerberg re Meta's VR Input Roadmap and Peripherals Strategy	3/30/2021	META-E-2R-01744301	META-E-2R-01744321	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0138	Document: Horizon Platform and Use Cases Discussion	9/30/2021	META-E-2R-04597168	META-E-2R-04597174	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0140	Emails between Mark Rabkin and Mark Zuckerberg regarding Sidequest and Sideloads	3/8/2022	META-E-2R-04613937	META-E-2R-04613938	Nonpublic User Data and Forward-Looking Analyses	Pages 1-2	Partial	Five Years
PX0141	Chat between Kimberly Unger, Miguel Barrera, and others regarding Quest user metrics,	3/31/2022	META-E-2R-04815491	META-E-2R-04815503	Non-Public User Data	Pages 1-3, 5-13	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	revenues, and a VR Disclosure deck							
PX0144	Workchat between Anand Dass, Rade Stojsaljevic, And Jane Chiao discussing the Beat Saber + Peloton proposal	3/8/2021	META-E-2R-00841622	META-E-2R-00841623	Forward-Looking Analyses	Page 1	Partial	Five Years
PX0146	Document: FB Inc. Fitness Strategy Working Draft	6/18/2021	META-E-2R-04595568	META-E-2R-04595586	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0157	Document: Oculus Fitness Product Investment Proposal	8/10/2021	META-E-2R-06412623	META-E-2R-06412632	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0159	Email from Eric Chang to Anand Dass regarding VR Fitness Vertical Monthly Update	11/15/2021	META-E-2R-00858660	META-E-2R-00858662	Non-Public User Data and Forward-Looking Analyses	Page 1-2	Partial	Five Years
PX0162	Email from Mike Verdu to Andrew Bosworth and Mike Rabkin outlining Beat Saber acquisition strategy/rationale/goals	10/17/2019	META-E-2R-01892884	META-E-2R-01892887	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0164	Document: Apps with the highest fitness activity	6/16/2022	META-E-2R-06456323	META-E-2R-06456332	Non-Public User Data and Forward-	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	(headset distance traveled per hour timespent & scraped Store Review data)				Looking Analyses			
PX0165	Quip Conversation History Document: Apps with the highest fitness activity (controller (headset distance traveled per hour timespent & scraped Store Review data)	6/16/2022	META-E-2R-06456333	META-E-2R-06456342	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0170	Email chain between Mike Verdu and Mar Zuckerberg regarding potential acquisition candidates, developer funding, and partnership proposals	2/22/2021	META-E-2R-01747862	META-E-2R-01747867	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0175	Email from Anand Dass to Jason Rubin re: Thoughts on Applications team Alignment into the Metaverse priorities	11/1/2021	META-E-2R-04921080	META-E-2R-04921081	Forward-Looking Analyses	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0177	Document outlining metrics for VR fitness use case	6/3/2021	META-E-2R-05151947	META-E-2R-05151948	Non-Public User Data	Pages 1-2	Partial	Five Years
PX0179	Email chain between Anand Dass and Jane Chiao regarding fitness investments	3/15/2021	META-E-2R-05859972	META-E-2R-05859973	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0186	Oculus Analytics FYI Document: <i>Fitness in VR: A Potential Big Opportunity</i> deck by Yihang Wang	3/2/2021	META-E-LIT-00070146	META-E-LIT-00070169	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0190	Document: Executive summary of plan to build the metaverse	7/1/2019	META-E-2R-05942940	META-E-2R-05942965	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0193	Email chain between Chris Pruett and Mark Verdu regarding potential acquisitions, future business planning, and organizational frictions	3/5/2021	META-E-2R-05627490	META-E-2R-05627491	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0194	Email chain between Kat Bachert and Jason Rubin regarding VR fitness partnerships,	7/27/2021	META-E-2R-01361718	META-E-2R-01361718	Forward-Looking Analyses	Page 1	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	developer proposals and future plans							
PX0196	Presentation: A literature review of VR Fitness Research	4/4/2021	META-E-2R-05151876	META-E-2R-05151876	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0200	Email from Chris Pruett to Tom Langan and Michael Verdu re: Boz follow up on video	10/24/2019	META-E-2R-01218471	META-E-2R-012184 72	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0202	Emails between Mark Rabkin, Andrew Bosworth, and Mark Zuckerberg regarding future VR strategy and acquisition plans	11/2/2021	META-E-2R-01731508	META-E-2R-01731509	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0203	Emails between Jason Rubin and Mark Zuckerberg regarding Rec Room and Horizon	4/26/2021	META-E-2R-01741108	META-E-2R-01741109	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0204	Presentation: VR Fitness Segments & Initial Personas Final Report	12/3/2021	META-E-LIT-00068491	META-E-LIT-00068491	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0207	Email from Angela Chang to Mark Zuckerberg, Mark Schroeder, Andrew Bosworth, et al. re:	3/4/2021	META-E-2R-01740426	META-E-2R-01740461	Forward-Looking Analyses	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	VR Roadmap Review Plan							
PX0210	Document comments by Carl Binder, Greg Marra, and Allison Berliner	3/3/2021	META-E-2R-02105443	META-E-2R-02105444	Non-Public User Data	Pages 1-2	Partial	Five Years
PX0211	Messages between Jason Rubin, Rade Stojaljevic, and others discussing an upcoming bundle for launch in holiday season 2022	8/27/2021	META-E-2R-02214347	META-E-2R-02214348	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0215	Document discussing Within acquisition considerations and alternatives	3/24/2022	META-E-2R-04595356	META-E-2R-04595359	Forward-Looking Analyses	Page 1	Partial	Five Years
PX0217	Document discussing Anand Dass's rationale for how to integrate and operate Within post-acquisition	8/5/2021	META-E-2R-06412672	META-E-2R-06412679	Forward-Looking Analyses	Page 1-2, 6-7	Partial	Five Years
PX0219	Document: Fitness Apps User Trends & Strategy Guidance	6/27/2022	META-E-LIT-00068508	META-E-LIT-00068534	Non-Public User Data and Forward-Looking Analyses	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0220	Workchat with Jane Chiao, Anand Dass, and others discussing fitness product priorities and partnerships	8/12/2021	META-E-2R-06446824	META-E-2R-06446825	Non-Public User Data and Forward-Looking Analyses	Pages 1-2	Partial	Five Years
PX0224	Email from Jen Prenner to Mark Zuckerberg, Alex Schultz, Andrew Bosworth, et al. re: 2022 Reality Labs VR Category Plan	1/26/2022	META-E-2R-04611404	META-E-2R-046114022	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0227	Email from Alisa Leung to Mark Zuckerberg, Sheryl Sandberg, David Whener, et al. re: 2022 Reality Labs budget	11/12/2021	META-E-2R-01730563	META-E-2R-01730595	Non-Public Financial Information	Fully Sealed	Complete	Five Years
PX0235	Messages between Anand Dass and Jason Rubin regarding FitXR's non-public future plans and funding requests	3/3/2022	META-E-2R-04925040	META-E-2R-04925040	Forward-Looking Analyses	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0239	Document: FRL Content: 5-Year Breadcrumbing Spring 2021 Update	5/24/2021	META-E- 2R- 06412958	META-E- 2R- 06412958	Forward- Looking Analyses	Fully Sealed	Complete	Five Years
PX0244	Messages between Aaron Davies, Christopher Journey, Christopher Pruett regarding Supernatural product quality and features	1/10/2020	META-E- 2R- 00978732	META-E- 2R- 00978733	Other Commercially Sensitive Information	Pages 1-2	Partial	Five Years
PX0246	Email from Michael Verdu to Chris Pruett, Yelena Rachitsky, Meaghan Fitzgerald re: Within's new Quest Exercise Program: Supernatural	1/2/2020	META-E- 2R- 05617918	META-E- 2R- 05617919	Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0247	A detailed analysis of whether to invest in a third party title	6/16/2022	META-E- 2R- 06456093	META-E- 2R- 06456107	Forward- Looking Analyses	Fully Sealed	Complete	Five Years
PX0250	Email from Michael Verdu to AR/VR ALL, Rebecca Van Dyck re: Broadening the audience for VR	12/18/2019	META-E- 2R- 00188451	META-E- 2R- 00188452	Non-Public User Data	Page 1	Partial	Five Years
PX0251	Email from Jane Chiao to John Anderson re: Quick	3/4/2021	META-E- 2R- 04480139	META-E- 2R- 04480141	Forward- Looking Analyses	Pages 2-3	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	Fitness / M&A Thoughts							
PX0253	Email from Melissa Brown to Michael Verdu, Anand Dass re: Pre-read for FitXR w/Attach: FitXR Executive Summary.pdf	4/26/2021	META-E-2R-00437708	META-E-2R-00437711	Non-Public Financial Information	Fully sealed	Complete	Five Years
PX0258	Messages between Jason Rubin, Erin Green, Bryan Pope w/Attach: images on October 30, 2021	10/30/2021	META-E-2R-01364969	META-E-2R-01364973	Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0261	Email from Michaela Dvorak to Jaroslav Beck, Deborah Guzman Barrios re: Beat Saber Movie Pitch + Discussion w/Attach: Beat Saber Pitch Deck 2.0.pdf	5/7/2020	META-E-2R-02300250	META-E-2R-02300275	Forward-Looking Analyses	Page 1	Partial	Five Years
PX0263	Messages between Angela Chang, Rade	2/24/2021	META-E-2R-01230616	META-E-2R-01230617	Non-Public Financial Information	Pages 1-2	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	Stojsavljevic, Allison Berliner, et al. on February 24, 2021							
PX0264	Email from Oculus Developer Support to Brian Huqueriza, Bob Garner, Richard Duck, et al. re: [Oculus] assignment: Managed Pitch Review "Liteboxer"	4/12/2021	META-E- 2R- 00418711	META-E- 2R- 00418717	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0265	Email from Oculus Developer Support to Rita Turkowski, Lisa Brewster, Bob Gardner re: [Oculus] assignment: Managed Pitch Review	4/5/2021	META-E- 2R- 00423888	META-E- 2R- 00423892	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0267	Messages between Erika Unger, Kenneth Morretino, Samuel Chen on May 1, 2020	5/1/2020	META-E- 2R- 00680868	META-E- 2R- 00680868	Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0270	Email from Kay Ali to Lindsay Seefeldt re: 12 mo	11/15/2021	META-E- 2R- 01754389	META-E- 2R- 01754393	Non-Public Financial Information	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	plan w/Attach: 2022 Financial Plan[21].xlsx							
PX0271	Messages between Samuel Chan, Erika Unger w/Attach: images on May 7, 2020	5/7/2020	META-E-2R-02089346	META-E-2R-02089346	Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0276	Email from Oculus Developer Support to Rita Turkowski, Bob Gardner, Chris Pruett re: [Oculus] assignment: Quest Pitch Submission	5/18/2020	META-E-2R-04672704	META-E-2R-04672706	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0277	Email from Oculus Developer Support to Rita Turkowski, Bob Gardner, Chris Pruett re: [Oculus] assignment: Quest Pitch Submission	4/28/2020	META-E-2R-04686388	META-E-2R-04686389	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0279	Messages between Deborah Guzman Barrios and Rade Stojisavljevic w/Attach: images on January 22,	1/22/2021	META-E-2R-05000112	META-E-2R-05000114	Other Commercially Sensitive Information and Forward-	Pages 2-3	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	2021				Looking Analyses			
PX0280	Messages between Aaron Davies and Erika Unger w/Attach: images on May 7, 2020	5/7/2020	META-E-2R-05236959	META-E-2R-05236962	Other Commercially Sensitive Information and Forward-Looking Analyses	Pages 1-2	Partial	Five Years
PX0281	Messages between Kristine Yang, Christopher Pruett, David Gordon on August 14, 2020	8-14-2020	META-E-2R-05654229	META-E-2R-05654229	Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0282	Email from Anand Dass to Jason Rubin re: Jason Anand	8/5/2021	META-E-2R-05931561	META-E-2R-05931567	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0284	Email from Jane Chaio to Anand Dass, Eric Hu, Matthew Isono re: FitXR vs. Supernatural	3/18/2021	META-E-2R-05931561	META-E-2R-05931567	Other Commercially Sensitive Information	Page 2	Partial	Five Years
PX0286	Messages between Anand Dass and Eric Chang on March 5, 2021	3/5/2021	META-E-2R-00841507	META-E-2R-00841508	Forward-Looking Analyses	Pages 1-2	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0288	Email from Michael Verdu to Joanna Kacka, Rade Stojavljevic, Josh Jaynes, et al. re: Context on the 3 Level Designers approval request	6/23/2021	META-E-LIT-00013902	META-E-LIT-00013902	Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0291	Presentation: System Seller Strategy Review Metaverse Content Studios Team (November 8, 2021)	11/8/2021	META-E-2R-05939877	META-E-2R-05939885	Non-Public Financial Information	Pages 3-4, 6-9	Partial	Five Years
PX0294	Messages between Gina Jones, Michael Verdu, Ian Carmichael, et al. w/Attach: images on February 12, 2021	2/12/2021	META-E-2R-04006595	META-E-2R-04006601	Other Commercially Sensitive Information	Pages 1-7	Partial	Five Years
PX0295	Email from Eric Chang to Chris Pruet, John Anderson, Kimberly Unger, et al. re: Connecting	4/13/2021	META-E-2R-04501499	META-E-2R-04501504	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	John Anderson (Facebook) Todd Dages (Spark Capital) re: LiteBoxer / Oculus							
PX0296	Document: Avatar SDK 2: 3P Early Access in VR	8/10/2021	META-E-LIT-00071854	META-E-LIT-00071864	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0297	Email from Mark Zuckerberg to Michael Verdu re: Sports games	2/22/2021	META-E-2R-01747857	META-E-2R-01747861	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0298	Messages between Jane Chiao and Gregory Marra on February 24, 2021	2/24/2021	META-E-2R-04855109	META-E-2R-04855110	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0299	Messages between Jason Sutherland, Jane Chiao, Hermes Corchs, et al. on May 3, 2021	5/3/2021	META-E-2R-05860275	META-E-2R-05860277	Forward-Looking Analyses	Page 1	Partial	Five Years
PX0301	Document: Share Purchase Agreement between Facebook, Inc., Facebook Technologies, LLC, Beat Games, etc.	11/8/2019	META-E-2R-03278879	META-E-2R-03279024	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0302	Document: Non-Competition Agreement	11/8/2016	META-E-2R-03279031	META-E-2R-03279036	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0303	Document: How Fitness Will Keep Users Coming Back to VR	10/18/2021	META-E-2R-04595408	META-E-2R-04595427	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0305	Email from Colan Sewell to Andrew Bosworth, Carmine Arabia, Michael Verdu, et al. re: Connecting	7/23/2020	META-E-2R-00330864	META-E-2R-00330866	Other Commercially Sensitive Information	Pages 1-2	Partial	Five Years
PX0306	Messages between Michael Berger, Erika Unger, Deborah Guzman Barrios, et al. w/Attach: images on August 17, 2020	8/17/2020	META-E-2R-01913299	META-E-2R-01913304	Other Commercially Sensitive Information	Pages 1, 3-4	Partial	Five Years
PX0307	Email from Jane Chiao to Riley Hageman, Eric Chang, Chris Pruett, et al. re: Fitness resourcing review sync	8/7/2021	META-E-2R-00851523	META-E-2R-00851525	Forward-Looking Analyses	Pages 1-2	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0308	Email from Mark Zuckerberg to Andrew Bosworth re: MZ Convo [HORIZON follow up]	3/2/2021	META-E-2R-01741391	META-E-2R-01741394	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0310	Document: Eden Assumptions	6/8/2021	META-E-2R-02117873	META-E-2R-02117878	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0312	Email from Lindsay Seefeldt to Rima Karam, Matt Zimmerman, Henry Kwan, et al. re: ACQUISITION: Project Saturday [Kickoff] w/Attach: Term Sheet - Project Saturday signed .pdf	10/31/2019	META-E-2R-04344955	META-E-2R-04344961	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0314	Email from Jane Chiao to FRL Reviews, Rebecca Van Dyck re: [FRL Reviews] [Oculus Leads] Fitness as a product priority for...	8/12/2021	META-E-2R-03237287	META-E-2R-03237288	Forward-Looking Analyses	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0315	Email from FRL Analytics Insights to Rade Stojisavljevic re: Oculus Daily Update — Tuesday, March 29th	3/30/2022	META-E-2R-04366784	META-E-2R-04366791	Non-Public Financial Information and Non-Public User Data	Fully Sealed	Complete	Five Years
PX0316	Messages between Nir Blumberger, Graham Mudd, Tolulope Akinbanji Akinola on July 27, 2021	7/27/2021	META-E-2R-00347488	META-E-2R-00347488	Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0317	Messages between Chris Milk and Nir Blumberger w/ Attach: images on June 13, 2021	6/13/2021	META-E-2R-04596601	META-E-2R-04596620	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0318	Document: Oculus Quest 2 (Miramar) XFN	6/22/2021	META-E-LIT-00069183	META-E-LIT-00069183	Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0319	Messages between Jason Rubin and Mark Zuckerberg on September 20, 2021	9/20/2021	META-E-2R-04462822	META-E-2R-04462826	Other Commercially Sensitive Information	Pages 1-5	Partial	Five Years
PX0320	Messages between Jane Chiao, Grace Chen	3/17/2022	META-E-2R-04867287	META-E-2R-04867288	Other Commercially Sensitive Information	Pages 1-2	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	w/Attach: images on March 17, 2022				Sensitive Information			
PX0322	Email from Chris Journey to Jason Rubin, Chris Pruett re: 3P VR Social Apps for Arcata	12/7/2021	META-E-2R-02593581	META-E-2R-02593582	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0324	Email from Caleb Li to Lindsay Seefeldt, Andrea Salah, Christ Tiutan, et al. re: Review Analytics: Game Studios w/Attach: Deal Goals v1.xlsx	8/30/2021	META-E-2R-00220819	META-E-2R-00220820	Forward-Looking Analyses	Page 2	Partial	Five Years
PX0325	Email from Andrew Bosworth to Alisa Leung, Jason Rubin, Vishal Shah, et al. re: [Feedback Requested] Project Eden - Additional HC Approach	8/19/2021	META-E-2R-03339400	META-E-2R-03339401	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0326	Messages between Michael Verdu and Andrew Bosworth on September 17, 2019	9/17/2019	META-E-2R-00354550	META-E-2R-00354550	Non-Public User Data and Other Commercially	Page 1	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
					Sensitive Information			
PX0340	Messages between Deborah Guzman Barrios, Rade Stojavljevic w/Attach: images on April 13, 2020	4/13/2020	META-E-2R-02332190	META-E-2R-02332192	Forward-Looking Analyses and Other Commercially Sensitive Information	Page 3	Partial	Five Years
PX0342	Email from Michael Verdu to Nir Blumberger, Chris Serra, Rade Stojavljevic, et al. re: Project Saturday w/Attach: Project Saturday Update.pdf	9/30/2019	META-E-2R-03994460	META-E-2R-03994467	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0343	Presentation: VR Fitness H2 OKRs and Vision 2021	3/2/2022	META-E-2R-04595379	META-E-2R-04595379	Forward-Looking Information and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0344	Email from Angela Chang to Andrew Bosworth, Douglas Seich, Angela Chang re: VR Roadmap	4/13/2020	META-E-2R-04599633	META-E-2R-04599658	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	Review w/Attach: VR Device Roadmap Update Apr 2020.pdf							
PX0346	Document: VR Fitness Content M&A thesis [WIP]	2/25/2021	META-E- 2R- 06413792	META-E- 2R- 06413798	Forward- Looking Information and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0351	Email from Anand Dass to Abigail Albright, May-May Chen, Don Stein re: Big Ballers Basketball Stats - Doge Labs	6/3/2022	META-E- LIT- 00006503	META-E- LIT- 00006508	Other Commercially Sensitive Information	Pages 1-6	Partial	Five Years
PX0352	Email from Anand Dass to James Williams, Elijah Allan-Blitz re: Floyd Mayweather VR game	6/9/2022	META-E- LIT- 00007466	META-E- LIT- 00007470	Other Commercially Sensitive Information	Pages 1-2, 4-5	Partial	Five Years
PX0353	Messages between Allison Berliner, Gio Hunt, Ashley Kelly, et al. on May 20, 2022	5/20/2022	META-E- LIT- 00011047	META-E- LIT- 00011050	Non-Public Financial Information	Pages 1-4	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0357	Document: MZ- VR Screens Review	4/26/2022	META-E-LIT-00031623	META-E-LIT-00031640	Forward-Looking Analysis	Fully sealed	Complete	Five Years
PX0358	Email from Nir Blumberger to Jason Rubin, Vishal Shah, Lindsay Seefeldt, et al re: Eden HC growth	10/7/2021	META-E-LIT-00015478	META-E-LIT-00015479	Non-Public Financial Information	Page 2	Partial	Five Years
PX0359	Email from Andrew Bosworth to Boz Staff, Rebecca Van Dyck re: [Boz Staff] Yesterday at the leadership offsite I lead a...	12/10/2019	META-E-2R-06391607	META-E-2R-06391609	Non-Public Financial Information	Pages 1-3	Partial	Five Years
PX0362	Messages between Alaina Laszewski, Kristine Yang, Deborah Guzman Barrios, et al. on February 17, 2021	2/17/2021	META-E-2R-02326530	META-E-2R-02326533	Forward-Looking Analyses	Pages 1-2	Partial	Five Years
PX0365	Messages between Deborah Guzman Barrios and Emre Motan w/Attach: images on July 13, 2021	7/13/2021	META-E-2R-02340812	META-E-2R-02340816	Non-Public User Data	Pages 2-5	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0367	Email from John Carmack to Ficus Kirkpatrick re: VR shell staffing w/Attach: H1'19 Planning_VR Shell Team Roadmap.pdf	5/6/2019	META-E-LIT-00030692	META-E-LIT-00030697	Forward-Looking Analyses	Fully sealed	Complete	Five Years
PX0368	Document: 1P Studios Status for Gio	3/28/2022	META-E-LIT-00100086	META-E-LIT-00100091	Forward-looking Analyses	Fully sealed	Complete	Five Years
PX0375	Email from Mark Rabkin to Michael Verdu, Mike Sego re: 2D Metaverse - Decision not to pursue	1/20/2022	META-E-2R-01303814	META-E-2R-01303817	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0385	Email from Jesse Nunez to Jason Rubin, Rade Stojavljevic, Chris Journey, et al. re: Digital Revenue Presentation Q2'22 w/Attach: App Store Revenue Presentation_Q2'22.pdf	7/26/2022	META-E-LIT-00061348	META-E-LIT-00061357	Non-Public Financial Information	Fully sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0379	Messages between Jason Rubin and Tamara Sciamanna w/Attach: images on July 31, 2021	7/31/2021	META-E-2R-02883266	META-E-2R-02883273	Non-Public Financial Information	Page 1, 3, 5-7	Partial	Five Years
PX0381	Messages between Jason Rubin and Anand Dass on September 15, 2021	9/15/2021	META-E-2R-05930570	META-E-2R-05930572	Non-Public Financial Information	Pages 1-3	Partial	Five Years
PX0384	Email from David Wehner to Nir Blumberger re: Request for approval: M&A Project Eden (FRL Content)	7/24/2021	META-E-2R-06437814	META-E-2R-06437815	Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0385	Email from Jesse Nunez to Jason Rubin, Rade Stojavljevic, Chris Journey, et al. re: Digital Revenue Presentation Q2'22 w/Attach: App Store Revenue Presentation_Q2'22.pdf	7/26/2022	META-E-LIT-00061348	META-E-LIT-00061357	Non-Public Financial Information	Fully sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0386	Email from Stephanie Young to Mark Zuckerberg re: [PRE-READ] 4.12 -- Hands Acceleration Review	4/12/2021	META-E-2R-06454707	META-E-2R-06454721	Non-Public Financial Information and Forward-Looking Analyses	Fully sealed	Complete	Five Years
PX0389	Email from Anand Dass to Eric Hu, Jane Chaio, Matthew Isono re: FitXR vs. Supernatural	3/18/2021	META-E-2R-00842659	META-E-2R-00842660	Non-Public Financial Information	Pages 1-2	Partial	Five Years
PX0394	Messages between Jaroslav Beck, Deborah Guzman Beck w/Attach: images on March 26, 2020	3/26/2020	META-E-2R-02300096	META-E-2R-02300102	Non-Public Financial Information	Page 4	Partial	Five Years
PX0408	Messages between Nathan Guiles, Rade Stojavljevic on March 2, 2021	3/2/2021	META-E-2R-03176815	META-E-2R-03176815	Non-Public Financial Information	Page 1	Partial	Five Years
PX0412	Email from Mark Zuckerberg to Vishal Shah, Vivek Sharma, Jason Rubin, et al. re: Horizon Reviews	10/31/2021	META-E-2R-01731375	META-E-2R-01731375	Non-Public Financial Information	Fully sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0413	Document: Marketing Hiring Strategy (Draft)	8/30/2022	META-E-LIT-00014973	META-E-LIT-00014979	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0415	Messages between Mark Zuckerberg, Mark Rabkin w/Attach: images on April 21, 2022	4/21/2022	META-E-LIT-00069852	META-E-LIT-00069854	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0416	Email from Edgar Auslander to Ben Porter; Andy Forsberg; Chris Pruet; et al. re: Just us ** with the attachments and a competitive landscape as well (we are refreshing that one and will include MESH) w/attach: AR Ecosystem Partnerships With EA additions.docx; AR EcosystemsRev8 copy.pptx; Final	3/3/2021	META-E-2R-02825792	META-E-2R-02825878	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	Quarterly ARVR Competitive Landscape_Dec 2020.pdf							
PX0417	Email from Jaroslav Beck to Rade Stojisavljevic re: Indie music	9/3/2020	META-E-2R-03185979	META-E-2R-03185981	Forward-Looking Analyses	Fully sealed	Complete	Five Years
PX0420	Presentation: Quest Functional Planning	5/5/2022	META-E-LIT-00057338	META-E-LIT-00057338	Forward-Looking Analyses	Fully sealed	Complete	Five Years
PX0421	Presentation: Oculus Report 2021.01.06 Oculus Move and Fitness VR	12/2/2021	META-E-LIT-00068752	META-E-LIT-00068752	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0422	Document: Adjacent Use Case Outcomes Post for Arcata	9/13/2022	META-E-LIT-00068756	META-E-LIT-00068758	Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0426	Presentation: Feedback On: Dogfooding Real-Time VR Fitness Classes	3/17/2022	META-E-LIT-00068830	META-E-LIT-00068830	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0432	Messgaes between Jane Chiao and Stephanie Montessi on March 31, 2021	3/31/2021	META-E-LIT-00032564	META-E-LIT-00032565	Non-Public User Data and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0433	Messages between Jane Chiao and Nisha Thatte-Potter on June 6, 2022	6/8/2022	META-E-LIT-00034708	META-E-LIT-00034711	Forward-looking Analyses and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0434	Presentation: Likelihood of Fitness Use on Incidental Fitness Apps	1/1/2021	META-E-LIT-00068494	META-E-LIT-00068494	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0435	Presentation Fitness Vertical Strategy	9/12/2022	META-E-LIT-00068589	META-E-LIT-00068589	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0422	Email from Andrew Bosworth to Mark Zuckerberg	2/22/2021	META-E-2R-01736990	META-E-2R-01736993	Non-Public Financial Information,	Fully sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	re: Content budget (was Re: Sports games)				Forward-Looking Analyses, and Other Commercially Sensitive Information			
PX0443	Email from Mark Zuckerberg to Andrew Bosworth, Carmine Arabia, Rafael Camargo, et al. re: AR/VR Peripherals	2/25/2021	META-E-2R-04462315	META-E-2R-04462315	Non-Public Financial Information, Forward-Looking Analyses, and Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0446	Email from Andrew Bosworth to Mark Zuckerberg, Michael Verdu, Andrea Besmehn re: Upcoming content roadmap	3/30/2021	META-E-2R-01744298	META-E-2R-01744300	Non-Public Financial Information, Forward-Looking Analyses, and Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0448	Email from Rebecca Van Dyck to Mike Schroepfer,	2/26/2021	META-E-2R-00369130	META-E-2R-00369131	Other Commercially	Pages 1-2	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	Mark Rabkin, Michael Verdu, et al. re: Doing a study on fitness of supernatural/fitxr users?				Sensitive Information			
PX0449	Presentation: Fitness Strategy 2022 (WIP)	5/23/2022	META-E-LIT-00057298	META-E-LIT-00057298	Non-Public Financial Information, Forward-Looking Analyses, and Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0451	Document: Apps with the highest fitness activity (headset distance traveled per hour timespent & scraped Store Review data)	9/19/2022	META-E-LIT-00069699	META-E-LIT-00069699	Non-Public Financial Information and Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0452	Presentation: DEFINING FITNESS IN OUR ECOSYSTEM	9/12/2022	META-E-LIT-00070069	META-E-LIT-00070069	Non-Public Financial Information and Other Commercially	Fully sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
					Sensitive Information			
PX0454	Email from Chris Cox to Andrew Bosworth re: Rec Room thoughts	4/19/2021	META-E-2R-00351082	META-E-2R-00351086	Non-Public Financial Information, and Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0455	Email from Michael Verdu to Mark Zuckerberg, Andrew Bosworth, Mark Rabkin re: Onward	3/4/2021	META-E-2R-01752645	META-E-2R-01752645	Non-Public Financial Information, and Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0456	Presentation: RL Digital Revenue Q1'22 Studio Updates (March 3, 2022)	3/3/2022	META-E-LIT-00099956	META-E-LIT-00099956	Non-Public Financial Information, Forward-Looking Analyses, and Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0457	Email from Rebecca Van Dyck to Paula Cuneo re: Happy new year	2/12/2020	META-E-2R-00191169	META-E-2R-00191175	Other Commercially Sensitive Information	Page 3	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0458	Email from Andy Robinson to Deborah Guzman Barrios re: [Confluence] Beat Saber > Season One Overview	3/26/2021	META-E-2R-02369359	META-E-2R-02369364	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0464	Messages between Anand Dass, Jacob Evertt on February 14, 2022	2/14/2022	META-E-LIT-00036814	META-E-LIT-00036814	Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0465	Messages between Natalie Chyi, Christopher Pruett w/Attach: images on June 29, 2021	6/29/2021	META-E-2R-01211743	META-E-2R-01211749	Non-Public Financial Information	Pages 1, 7	Partial	Five Years
PX0468	Messages between Rade Stojavljevic and Deborah Guzman Barrios on February 16, 2021	2/16/2021	META-E-2R-05009548	META-E-2R-05009549	Non-Public Financial Information and Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0473	Messages between Christopher Pruett, Meaghan Fitzgerald, Raisah Aziz on March 4, 2020	3/4/2020	META-E-2R-02817621	META-E-2R-02817629	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0476	Messages between Amanda Jefson and Anand Dass on June 20, 2022	6/20/2022	META-E-LIT-00037908	META-E-LIT-00037908	Forward-Looking Analyses and Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0477	Email from Google Slides to Anand Dass re: Apps_Content Deep... - @abbya@fb.com also pls include May M...	7/25/2022	META-E-LIT-00040669	META-E-LIT-00040670	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0478	Messages between Jason Rubin, Christopher Pruett, Erika Unger w/Attach: images December 3, 2021	12/3/2021	META-E-2R-04717396	META-E-2R-04717404	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0479	Email from Jane Chiao to Grace Chen re: FitXR: Financial Loss Due to Meta	3/17/2022	META-E-2R-04868063	META-E-2R-04868067	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0480	Messages between Natalie Chyi and Christopher Pruett on April 7, 2021	4/7/2021	META-E-2R-05662315	META-E-2R-05662315	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0482	Messages between Aaron Davies and Christopher w/Attach: images on April 4, 2020	4/6/2020	META-E-2R-05690386	META-E-2R-05690389	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0484	Document: Content Sourcing of Applications	11/13/2012	META-E-LIT-00057659	META-E-LIT-00057688	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0485	Messages between Jared Kennedy and Anand Dass on July 26, 2022	07/26/2022	META-E-LIT-00040705	META-E-LIT-00040705	Non-Public Financial Information, Forward-Looking Analyses, and Commercially Sensitive Information.	Page 1	Partial	Five Years
PX0487	Document: [Decision] First Party Fitness Investment	5/14/2021	META-E-LIT-00058082	META-E-LIT-00058096	Forward-Looking Analyses, and Other Commercially Sensitive Information	Page 9	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0492	Document: Quick Fitness / M&A Thoughts	3/9/2021	META-E-LIT-00081679	META-E-LIT-00081689	Forward-Looking Analyses, and Other Commercially Sensitive Information	Page 2	Partial	Five Years
PX0494	Document: Content Ecosystem Cheat Sheet	9/9/2021	META-E-LIT-00011549	META-E-LIT-00011556	Non-Public Financial Information and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0495	Messages between Chris Pruett and Joe Paley on September 15, 2019	9/15/2019	META-E-2R-05719823	META-E-2R-05719829	Non-Public Financial Information, Forward-Looking Analyses, and Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0496	Document: VR Subscriptions - Content Pipeline and Potential Usage Deep Dive Pre-Read	8/17/2020	META-E-LIT-00058271	META-E-LIT-00058285	Forward-Looking Analyses and Other Commercially	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
					Sensitive Information			
PX0497	Document: What to Expect When Monetizing	4/7/2021	META-E-LIT-00058206	META-E-LIT-00058210	Non-Public Financial Information and Non-Public User Data	Pages 2-4	Partial	Five Years
PX0499	Document: Oculus ARPU Steer Discussion	7/19/2022	META-E-LIT-00091432	META-E-LIT-00091453	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0504	Presentation: Oculus Move Design Review (August 2020)	10/31/2020	META-E-LIT-00070719	META-E-LIT-00070719	Non-Public User Data and Financial Information	Pages 9, 27	Partial	Five Years
PX0505	Spreadsheet: Specification 36 Response.xlsx	5/2/2022	META-E-2R-03280972	META-E-2R-03280972	Non-Public Financial Information, Forward-Looking Analyses, and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0508	Presentation: Fitness in VR: A Potential Big Opportunity	2/4/2021	META-E-LIT-00068506	META-E-LIT-00068506	Non-Public User Data, Non-Public Financial Information, and Other Commercially Sensitive Information	Pages 6-14, 17-19, 25, 27	Partial	Five Years
PX0510	Presentation: 2022 VR Fitness Strategy	2/18/2021	META-E-LIT-00080783	META-E-LIT-00080783	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0514	Messages between Michael Verdu, Melissa Brown, Anand Dass on April 23, 2021	4/23/2021	META-E-2R-00447189	META-E-2R-00447190	Other Commercially Sensitive Information	Pages 1-2	Partial	Five Years
PX0521	Messages between Jaroslav Beck, Rade Stojisavljevic w/Attach: images on January 5, 2021	1/5/2021	META-E-2R-03186125	META-E-2R-03186127	Non-Public Financial Information and Forward-Looking Analyses	Page 1	Partial	Five Years
PX0522	Messages between Michael Doran, Rade	1/22/2021	META-E-2R-03174977	META-E-2R-03174977	Forward-Looking Analyses and	Page 1	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	Stojsavljevic on January 22, 2021				Other Commercially Sensitive Information			
PX0523	Messages between Sharvil Talati, Angela Chang, Atman Binstock w/Attach: images on February 16, 2021	2/16/2021	META-E-2R-05627452	META-E-2R-05627457	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0527	Presentation: Operation Twinkie	n/a	META-E-LIT-00106197	META-E-LIT-00106197	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0530	Messages between Rade Stojsavljevic, Michael Doran, David Yee w/Attach: images on March 11, 2021	3/11/2021	META-E-2R-03173705	META-E-2R-03173712	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0532	Document: Oculus Analytics FYI	3/1/2021	META-E-LIT-00069481	META-E-LIT-00069482	Non-Public User Data and Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0533	Messages between Alexandra Sullivan,	3/30/2021	META-E-2R-02315307	META-E-2R-02315307	Forward-Looking Analyses and	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	Rade Stojisavljevic on March 30, 2021				Other Commercially Sensitive Information			
PX0537	Messages between Melissa Brown and Naomi Cornman w/Attach: images on September 2, 2021	9/2/2021	META-E-2R-01961309	META-E-2R-01961311	Forward-Looking Analyses	Page 1	Partial	Five Years
PX0540	Spreadsheet: Eden-Talent Deep Dive - Content (internal working doc).xlsx	2/8/2022	META-E-2R-04595380	META-E-2R-04595380	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0542	Email from Oculus Developer Support to Rita Brennan Turkowski, Lisa Brewster, Bob Gardner re: [Oculus] assignment: Managed Pitch Review "PowerBeatsVR"	6/11/2021	META-E-2R-04625847	META-E-2R-04625856	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0544	Document: RL Discussions	4/15/2020	META-E-LIT-00069529	META-E-LIT-00069529	Forward-Looking Analyses	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0545	Email from Raisah Aziz to Allison Berliner, Melissa Brown, Chris Pruett re: Strategic Priorities: Subscriptions	2/9/2021	META-E-2R-05895272	META-E-2R-05895276	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0549	Email from Melissa Brown to Chris Pruett, John Anderson re: [Inform] Subscriptions Post-MVP Feature Timeline Slip	7/9/2021	META-E-2R-06403326	META-E-2R-06403330	Non-Public User Data	Fully Sealed	Complete	Five Years
PX0550	Document: Beat Saber - Verdu Brief	9/19/2022	META-E-LIT-00099508	META-E-LIT-00099517	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0551	Document: Oculus Analytics Lightning Insights	9/14/2022	META-E-LIT-00069054	META-E-LIT-00069055	Non-Public User Data	Fully Sealed	Complete	Five Years
PX0552	Email from Tatin Yang to Jonathan Carmona, Deborah Guzman Barrios, Patricia Wayne, et al. re: PMM Input 2 REC Opportunities for	12/4/2022	META-E-2R-05051639	META-E-2R-05051644	Forward-Looking Analyses	Pages 4-6	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	Beat Saber (24-hour window)							
PX0555	Presentation: RL Digital Revenue Q2'22 Studio Updates	6/8/2022	META-E-LIT-00099946	META-E-LIT-00099948	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0556	Messages between Aaron Davies, Melissa Brown, Chris Journey, et al. on June 17, 2022	6/17/2022	META-E-LIT-00022200	META-E-LIT-00022203	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0557	Presentation: VR Fitness Vertical Overview	6/17/2022	META-E-LIT-00029704	META-E-LIT-00029704	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0558	Email from Melissa Brown to Michael Verdu, Chris Pruett re: Overview of FitXR changes for your call on Thursday	12/8/2020	META-E-2R-01925558	META-E-2R-01925559	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0559	Email from Mark Zuckerberg to Mike Schroepfer, Amin Zoufonoun, Brendan Iribe, et al. re: VR / AR strategy and Unity	6/22/2015	META-E-LIT-00109649	META-E-LIT-00109651	Forward-Looking Analyses	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0560	Messages between Jason Rubin, Mark Zuckerberg on September 15, 2021	9/15/2021	META-E-LIT-00106499	META-E-LIT-00106501	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0565	Email from Melissa Brown to Anand Dass, Michael Verdu, Julie MacMaster, et al. re: Within Executive Summary, Pre-read	4/20/2021	META-E-2R-01968457	META-E-2R-01968461	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0566	Document: Metaverse Content Reviews	9/2/2020	META-E-2R-02601942	META-E-2R-02601943	Forward-Looking Analyses and Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0567	Email from Contracts to Michael Verdu, legal_noreply, and Samuel Cole re: Completed: You're copied on "FITXR" - Facebook Technologies, LLC - INB - Oct 02, 2020 w/Attach: Addendum to Distribution	10/20/2020	META-E-2R-03245433	META-E-2R-03245440	Non-Public Financial Information and Other Commercially Sensitive Information	Fully Sealed	Complete	Complete

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	Agreement for "FITXR"							
PX0568	Email from Michael Verdu to Michael Verdu re: Q&A - Rabkin Live	9/22/2020	META-E-2R-01406780	META-E-2R-01406781	Forward-Looking Analyses and Other Commercially Sensitive Information	Pages 1-2	Partial	Five Years
PX0569	Messages between Raisah Aziz, Jane Chiao, Rade Stojavljevic, et al. on February 9, 2021	2/9/2021	META-E-2R-02852826	META-E-2R-02852827	Forward-Looking Analyses and Other Commercially Sensitive Information	Pages 1-2	Partial	Five Years
PX0571	Email from Michael Verdu to Andrew Bosworth and Mark Rabkin re: MZ Convo	2/25/2021	META-E-2R-00382846	META-E-2R-00382846	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
PX0573	Document: Fitness HMD Partnership Proposal	3/10/2021	META-E-LIT-00081641	META-E-LIT-00081646	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
PX0582	Messages between Ashley Kelly, Melissa Brown, Deborah Guzman Barrios on October 6,	10/6/2020	META-E-2R-01963644	META-E-2R-01963644	Forward-Looking Analyses and Other Commercially	Page 1	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	2020				Sensitive Information			
PX0584	Messages between Melissa Brown and Michael Verdu on December 10, 2020	12/10/2020	META-E-2R-00434390	META-E-2R-00434391	Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0588	Email from Melissa Brown to Michael Verdu, Anand Dass re: Within Executive Summary, Pre-read	4/23/2021	META-E-2R-00480237	META-E-2R-00480238	Other Commercially Sensitive Information	Page 1	Partial	Five Years
PX0598	Document: Project Eden - Strategy, Rationale, Goals	7/19/2022	META-E-LIT-00099607	META-E-LIT-00099611	Forward-Looking Analyses and Other Commercially Sensitive Information	Pages 1-3, 5	Partial	Five Years
PX0599	Presentation: Deal Kickoff: PROJECT SATURDAY	11/1/2019	META-E-LIT-00099613	META-E-LIT-00099622	Forward-Looking Analyses	Pages, 4-5	Partial	Five Years
DX1231	Expert Report of Dr. Jean-Pierre Dubé ¹	12/6/2022	n/a	n/a	Non-Public User Data and Other Commercially	Pg. 2, ¶ 9; Pg. 9, ¶ 24; Pg. 10, ¶ 24; Pg. 15, ¶ 36; Pg. 17, ¶ 39 (fn. 65)	Partial	Five Years

¹ Meta's proposed redactions in the expert reports are highlighted in yellow. Within's proposed redactions are highlighted in blue. Meta and Within combined their redactions to aid the Court's review.

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
					Sensitive Information			
DX1233	Expert Report of Dr. Michael Zyda	12/6/2022	n/a	n/a	Non-Public User Data	Pg. 22, ¶ 52; Pgs. 22-23, ¶ 53; Pgs. 23-24, Table 1; Pg. 25, Fn. 32; Pg. 39, Fn. 83; Pg. 43, ¶ 82; Pg. 44, Fn. 101; Pg. 61, ¶ 107; Pg. 64, Fn. 162; Pg. 65, Fn. 163; Pg. 66, Fn. 64; Pg. 67, Fn. 169; Pg. 69, ¶ 122; Pg. 167, Fn. 174; Pg. 175, ¶ 132	Partial	Five Years
DX1232	Expert Report of Dr. Theodore Vickey	12/6/2022	n/a	n/a	Non-Public User Data	Pg. 12, ¶ 30, lines 7-8, 18-19; Pg. 26, ¶ 59, lines 12-13, 17-18; Pg. 27, ¶ 60, lines 15-24; Pg. 29, ¶ 66, lines 11-12, 26; Pg. 30, ¶ 66, lines 2-3	Partial	Five Years
DX1230	Expert Report of Dr. Dennis Carlton	12/6/2022	n/a	n/a	Forward-Looking Analyses, Non-Public Financial	Pg. 180, Line 25; Pg. 180, Line 17; Pg. 181, Line 21; Pg. 182, Lines 4-5;	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
					Information, and Other Commercially Sensitive Information	Pg. 182, Lines 13-17; Pg. 182, Lines 21-22; Pg. 182, Line 25; Pg. 183, Line 1; Pg. 183, Line 23; Pg. 184, Line 14; Pg. 186, Line 22; Pg. 190, Lines 6-8; Pg. 247, Lines 21-23; Pg. 248, Lines 14-15; Pg. 267, Lines 20-21; Pg. 268, Lines 1-2; Pg. 268, Lines 9-11; Pg. 268, Lines 12-13; Pg. 272, Lines 5-6; Pg. 274, Lines 4-5; Pg. 274, Lines 10-11; Pg. 274, Lines 18-19; Pg. 279, Lines 6-7; Pg. 279, Lines 9-13; Pg. 279, Lines 15-23; Pg. 281, Lines 8-9;		

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						Pg. 284, Lines 12-14		
PX0015	Expert Report of Dr. Hal Singer	11/22/2022	n/a	n/a	Forward-Looking Analyses, Non-Public Financial Information, Non-Public User Data, and Other Commercially Sensitive Information	Pg. 13, ¶ 28; Pg. 19, ¶ 44; Pg. 20, ¶ 44; Pg. 20, ¶ 45; Pg. 20, ¶ 45 (footnote 86); Pg. 32, ¶ 77; Pg. 33, ¶ 79 (and two columns of Table 2-A); Pg. 35, three columns of Table 2-B; Pg. 36, ¶ 84; Pg. 37, ¶ 84; Pg. 38, three columns of Table 3-A Pg. 39, three columns of Table 3-B; Pg. 47, ¶ 102 and footnote 190; Pg. 48, ¶ 104 and footnotes 193 and 194; Pg. 48, ¶ 105 and footnotes 195 and 197; Pg. 48, ¶ 106; Pg. 49, ¶ 106 and footnotes 198, 199 and 200; Pg. 49, ¶ 107 and footnote 201; Pg.	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						50, Footnote 203; Pg. 51, ¶ 110; Pg. 52, ¶ 112 and footnotes 219 and 220; Pgs. 52-53, ¶ 114 and Footnotes 221 and 222; Pg. 59, ¶ 121 and footnote 255; Pg. 64, ¶ 130 and footnote 275; Pg. 85, ¶ 189; Pg. 86, ¶ 190		
PX0016	Rebuttal Report of Dr. Hal Singer	12/16/2022	n/a	n/a	Forward-Looking Analyses, Non-Public Financial Information, Non-Public User Data, and Other Commercially Sensitive Information	Pg. 6, ¶ 7.c.i Pg. 7, ¶ 7.f.i Pg. 9, ¶ 7.g.ii Pg. 15, ¶ 27 Pg. 16, ¶ 29 Pg. 16, ¶ 30 Pgs. 19-20, ¶ 41 Pg. 43, ¶ 116 Pg. 43, Footnote 172 Pg. 45, ¶ 120 Pg. 46, ¶ 122 Pgs. 47-48, ¶ 126 Pg. 48, ¶ 128 Pg. 49, ¶ 131 Pg. 50, Table 1 Pgs. 53-54, ¶ 140	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						Pgs. 54-56, Table 2 Pg. 58, ¶ 149 Pg. 59, ¶ 150 Pg. 59, ¶ 151 Pg. 69, ¶ 182 Pg. 70, ¶ 186 Pg. 71, ¶ 190 Pg. 72, Footnote 292 Pg. 76, ¶ 208		
DX1001	Email from Michael Verdu to Anand Dass regarding VR Fitness Conten... - Main comment here is that we need to ...	3/1/2021	META-E-2R-00841118	META-E-2R-00841119	Other Commercially Sensitive Information	Pages 1 – 2	Partial	Five Years
DX1003	Fitness as an Oculus product priority	8/10/2021	META-E-2R-01338819	META-E-2R-01338835	Forward-Looking Analyses	Pages 2, 4, 12,	Partial	Five Years
DX1004	VR Fitness Literature Review	8/11/2021	META-E-2R-01341336	META-E-2R-01341336	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
DX1005	VR Fitness 2.0 strategy	6/2/2021	META-E-2R-01341743	META-E-2R-01341751	Non-Public User Data	Page 9	Partial	Five Years
DX1006	MZ VR Roadmap Review - Mar 2021 [REDACTED]	3/4/2021	META-E-2R-01740426	META-E-2R-01740461	Forward-Looking Analyses	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
DX1007	Workplace chat among Dorrie Paynter; Karen Swanson; and Jane Chiao	3/10/2021	META-E-2R-02104396	META-E-2R-02104396	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
DX1008	AR/VR Ecosystems Development PowerPoint	3/3/2021	META-E-2R-02825792	META-E-2R-02825878	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
DX1009	AR/VR Competitive Landscape	3/3/2021	META-E-2R-02825792	META-E-2R-02825878	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
DX1010	Email from Michael Verdu to AR/VR ALL, Rebecca Van Dyck re: Broadening the audience for VR	12/18/2019	META-E-2R-00188451	META-E-2R-00188452	Non-Public User Data	Page 1	Partial	Five Years
DX1011	Email from Anand Dass to Jane Chiao regarding FW: Pre-read for Fitness Investments	3/11/2021	META-E-2R-03628762	META-E-2R-03628762	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
DX1012	Workplace chat between Michael Verdu and Anand Dass	5/26/2021	META-E-2R-03628924	META-E-2R-03628928	Non-public Financial Information and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
DX1013	Email from Lindsay Seefeldt to CD Integration regarding FW: Beat Games (Project Saturday): 1-year M&A deal review	1/15/2021	META-E-2R-04467212	META-E-2R-04467213	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
DX1014	Email from Jane Chiao to John Anderson regarding Quick Fitness / M&A Thoughts	3/4/2021	META-E-2R-04480139	META-E-2R-04480141	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
DX1015	Email from Jen Prenner to Mark Zuckerberg et al. regarding 2022 Reality Labs VR Category Plan [Review]	1/26/2022	META-E-2R-04611404	META-E-2R-04611422	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
DX1016	VR Fitness Content Investment Thesis v2	3/10/2021	META-E-2R-04865217	META-E-2R-04865230	Non-Public User Data	Pages 8-9, 11-14	Partial	Five Years
DX1017	VR Fitness Content Investment Thesis v2	3/10/2021	META-E-2R-04865217	META-E-2R-04865230	Non-Public User Data	Pages 8-9, 11-14	Partial	Five Years
DX1018	Project Eden XFN Kickoff Deck	n/a	META-E-2R-05914489	META-E-2R-05914498	Forward-Looking Analyses	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
DX1019	VR Fitness Content Investment Thesis v2	9/17/2021	META-E-2R-05940256	META-E-2R-05940269	Forward-Looking Analyses and Non-Public User Data	Pages 8-9, 11-14	Partial	Five Years
DX1020	[Decision] First Party Fitness Investment	5/14/2021	META-E-2R-06413061	META-E-2R-06413075	Forward-Looking Analyses and Non-Public User Data	Fully Sealed	Complete	Five Years
DX1021	VR Fitness Content M&A thesis [WIP]	3/8/2021	META-E-2R-06413792	META-E-2R-06413798	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
DX1023	Email from David Wehner to Nir Blumberger, copying Mark Zuckerberg et al. regarding Request for approval: M&A Project Eden (FRL Content)	6/24/2021	META-E-2R-06437814	META-E-2R-06437815	Forward-Looking Analyses and Non-Public User Data	Fully Sealed	Complete	Five Years
DX1024	Apps with the highest fitness activity	6/16/2022	META-E-2R-06456323	META-E-2R-06456332	Non-public User Data	Fully Sealed	Complete	Five Years
DX1025	Data responsive to FTC Second Request Specification	n/a	META-E-2R-DATA-00000002	META-E-2R-DATA-00000002	Non-Public Financial Information and Other Commercially	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
					Sensitive Information			
DX1026	Excel Document Listing AR/VR product codenames and descriptions, hardware unites, revenue, cost of goods sold, operating expenses, and assets and liabilities	05/02/2022	META-E-2R-DATA-00000005	META-E-2R-DATA-00000005	Non-Public Financial Data and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
DX1027	Excel Document listing VR app user data, including time spent, revenue, entitlements, and penetration	n/a	META-E-2R-DATA-00000012	META-E-2R-DATA-00000012	Non-Public Financial Data and Other Commercially Sensitive Information	Sealed	Complete	Five Years
DX1028	Excel document listing Meta's funding of and grants to third party VR apps	n/a	META-E-2R-DATA-00000026	META-E-2R-DATA-00000026	Non-Public Financial Information	Fully Sealed	Complete	Five Years
DX1029	Excel document listing VR app user data, including MAU shares	n/a	META-E-2R-DATA-00000033	META-E-2R-DATA-00000033	Non-Public User Data	Fully Sealed	Complete	Five Years
DX1030	Excel document listing App ID numbers,	n/a	META-E-2R-DATA-	META-E-2R-DATA-	Other Commercially	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	corresponding app names, and fitness app categorization		00000035	00000035	Sensitive Information			
DX1031	Excel document listing VR app user data, including entitlements and time spent and financial data, including revenue	n/a	META-E-2R-DATA-00000037	META-E-2R-DATA-00000037	Non-Public Financial Information and User Data	Fully Sealed	Complete	Five Years
DX1032	Excel Document listing VR app user data, including time spent, revenue, entitlements, and penetration	n/a	META-E-2R-DATA-00000039	META-E-2R-DATA-00000039	Non-Public User Data	Fully Sealed	Complete	Five Years
DX1034	Fitness Vertical Strategy Document	6/17/2022	META-E-LIT-00029704	META-E-LIT-00029704	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
DX1037	Fitness as an Oculus Product Priority Document	1/31/2022	META-E-LIT-00057689	META-E-LIT-00057705	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
DX1038	First Party Fitness Investment Document	5/14/2021	META-E-LIT-00058082	META-E-LIT-00058096	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
DX1039	Deal: Kickoff – Within acquisition rationale document	2/8/2022	META-E-LIT-00060654	META-E-LIT-00060663	Forward-Looking Analyses	Page 4	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
DX1041	VR Fitness Segments & Initial Personas Final Report	9/9/2022	META-E-LIT-00068491	META-E-LIT-00068491	Forward-Looking Analyses and Non-Public User Data	Pages 11-16, 23, 81-84, 87	Partial	Five Years
DX1042	Likelihood of Fitness Use on Incidental Fitness Apps Presentation	9/12/2022	META-E-LIT-00068494	META-E-LIT-00068494	Forward-Looking Analyses	Pages 3-5, 30-33, 35-38	Partial	Five Years
DX1043	Fitness Apps User Trends & Strategy Guidance Document	9/12/2022	META-E-LIT-00068508	META-E-LIT-00068534	Forward-Looking Analyses and Non-Public User Data	Fully Sealed	Complete	Five Years
DX1044	Fitness Vertical Strategy Document	9/12/2022	META-E-LIT-00068589	META-E-LIT-00068589	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
DX1045	June 2022 VR Fitness Strategy Document	9/12/2022	META-E-LIT-00068590	META-E-LIT-00068590	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
DX1046	VR Fitness Segments & Initial Personas Final Report	9/13/2022	META-E-LIT-00068811	META-E-LIT-00068811	Forward-Looking Analyses and Non-Public User Data	Pages 11-16, 23, 81-84, 87	Complete	Five Years
DX0147	Apps with the highest fitness activity (headset distance traveled per hour timespent) document	n/a	META-E-LIT-00069699	META-E-LIT-00069699	Non-Public User Data and Other Commercially	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
					Sensitive Information			
DX1048	Document Defining Fitness in Meta's ecosystem and describing priority fitness titles	9/15/2022	META-E-LIT-00070069	META-E-LIT-00070069	Other Commercially Sensitive Information	Pages 3-4	Partial	Five Years
DX1049	VR Fitness Strategy Working Document 2022	4/8/2022	META-E-LIT-00079332	META-E-LIT-00079348	Forward-Looking Analyses and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
DX1051	2022 VR Fitness Strategy Check Inx	2022	META-E-LIT-00080783	META-E-LIT-00080783	Non-Public Financial Information	Fully Sealed	Complete	Five Years
DX1052	Quick Fitness - M&A Thoughts	3/9/2021	META-E-LIT-00081679	META-E-LIT-00081689	Non-Public Financial Information	Fully Sealed	Complete	Five Years
DX0153	VR Fitness Content Investment Thesis v2	n/a	META-E-LIT-00100140	META-E-LIT-00100153	Non-Public Financial Information	Fully Sealed	Complete	Five Years
DX0154	Applications Futurecasting (2022 and beyond)	2022	META-E-LIT-00118302	META-E-LIT-00118331	Forward-Looking Analyses	Fully Sealed	Complete	Five Years
DX0155	VR Fitness Content M&A thesis	2022	META-E-LIT-00118750	META-E-LIT-00118756	Forward-looking Analyses and Non-Public	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
					Financial Information			
DX0156	Quick Fitness - M&A Thoughts	3/9/2021	META-E-LIT-00118815	META-E-LIT-00118825	Non-Public Financial Information	Fully Sealed	Complete	Five Years
DX0157	VR Category Plan	2022	META-E-LIT-00136628	META-E-LIT-00136655	Non-Public Financial Information	Fully Sealed	Complete	Five Years
DX0158	Data responsive to FTC Request for Production	n/a	META-E-LIT-DATA-0000001	META-E-LIT-DATA-0000001	Non-Public User Data and Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
DX0159	Data responsive to FTC Request for Production	n/a	META-E-LIT-DATA-0000006	META-E-LIT-DATA-0000006	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
DX0160	Data responsive to FTC Request for Production	n/a	META-E-LIT-DATA-0000007	META-E-LIT-DATA-0000007	Non-Public Financial Information	Fully Sealed	Complete	Five Years
DX0161	Data responsive to FTC Request for Production	n/a	META-E-LIT-DATA-0000015	META-E-LIT-DATA-0000015	Non-Public Financial Information	Fully Sealed	Complete	Five Years
DX0162	Data responsive to FTC Request for Production	n/a	META-E-LIT-DATA-0000017	META-E-LIT-DATA-0000017	Non-Public Financial Information and User Data	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
DX0163	Data responsive to FTC Request for Production	n/a	META-E-LIT-DATA-0000029	META-E-LIT-DATA-0000029	Non-Public Financial Information	Fully Sealed	Complete	Five Years
DX0164	Data responsive to FTC Request for Production	n/a	META-E-LIT-DATA-0000031	META-E-LIT-DATA-0000031	Non-Public Financial Information	Fully Sealed	Complete	Five Years
DX0165	Data responsive to FTC Request for Production	n/a	META-E-LIT-DATA-0000032	META-E-LIT-DATA-0000032	Non-Public Financial Information	Fully Sealed	Complete	Five Years
DX0166	Data responsive to FTC Request for Production	n/a	META-E-LIT-DATA-0000033	META-E-LIT-DATA-0000033	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
DX0167	Data responsive to FTC Request for Production	n/a	META-E-LIT-DATA-0000047	META-E-LIT-DATA-0000047	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
DX0168	Data responsive to FTC Request for Production	n/a	META-E-LIT-DATA-0000049	META-E-LIT-DATA-0000049	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years
DX0169	Data responsive to FTC Request for Production	n/a	META-E-LIT-DATA-0000050	META-E-LIT-DATA-0000050	Other Commercially Sensitive Information	Fully Sealed	Complete	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
DX1205	Deposition Transcript of Deborah Guzman Barrios (November 3, 2022)	11/3/2022	n/a	n/a	Other Commercially Sensitive Information	236:21-237:22; 240:1, 9-10, 17, 21-22, 24; 241:2, 13, 19; 242:2, 10-17, 20- 21; 244:4-6, 10-14, 17-20; 245:18; 257:3-4, 13, 16; 272:19-20, 272:24-273:5, 11- 13 275:13-20 276:2, 5-7	Partial	Five Years
DX1310	Email from Clay Wilson to Andrew Bosworth re: FRL PRs > \$2M, Contracts > \$5M; weekly review	8/4/2021	META-E-2R-00356833	META-E-2R-00356834	Other Commercially Sensitive Information	Fully sealed	Complete	Five Years
PX0050	Deposition Transcript of Mark Zuckerberg (October 18, 2022)	10/18/2022	n/a	n/a	Non-Public Financial Information, Forward-Looking Analyses, and Other Commercially	20:21-23; 21:4, 18-20; 26:3-5, 23- 25; 36:3-6; 38:23- 39:8; 40:9-13; 41:8-10, 15-17; 41:21-42:2; 42:7- 18, 20-22; 43:14- 15, 21-24; 43:25-	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
					Sensitive Information	44:10; 44:12, 21-24; 50:15-21; 50:25-51:8; 52:6-9, 16-19; 53:1-9, 14-19; 55:19-56:8; 59:15-17; 84:21-22 88:1-6; 88:9-11, 13-17; 89:4-10; 90:7-9, 14-25; 91:1-6; 93:14-15; 98:9-12, 21-25; 99:7-16; 102:11, 16-22; 103:10-13, 17-23; 104:2-12, 19-22; 105:11-15, 18-24; 108:10, 24-25; 109:1-2, 9-17, 23-25; 110:3-111:10, 12-16; 113:3-4, 8-12, 21; 114:19-115:11; 118:15-17; 119:13-16; 120:5-6, 16-22; 121:5-6; 122:9-10, 12-19; 124:2-4, 7-8, 24-25; 125:4-6, 10-18; 126:2-4, 12-14;		

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						127:7-17, 23-25; 128:1, 4-23; 128:24-129:5; 129:8-25; 130:2-4, 9-24; 131:13-14; 132:16-18; 144:22; 145:6, 18, 21; 146:9-12; 150:8-11, 13-20; 151:1-4, 8-13; 152:9-11; 153:25-154:9; 154:25-155:1; 156:18-20; 157:3, 8-18; 159:19-21 162:12-21; 162:22-163:10, 17-20; 163:21-164:2; 175:8-13, 14-15, 17-20; 176:11; 177:1-2, 8-9; 181:5-8, 11-16, 20-23; 183:10-14; 183:23-184:5, 8-11, 13-15, 19, 23-25; 203:14-19; 203:24-204:4 204:6-10; 204:25-205:1; 206:21-23;		

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						208:22-23; 209:14-16; 210:23-25; 211:3-8; 212:16, 22-23; 216:3-11, 18-25; 217:1-7; 222:24-223:7; 223:10-11; 223:22-224:1; 237:23-238:2, 5-9, 11-13; 238:16-239:5; 239:23-240:2; 240:19-24; 241:2-4, 8, 15-18, 20; 241:25-242:1; 242:12-13; 243:3, 6		
PX0052 DX1213	Deposition Transcript of Rade Stojisavljevic (October 14, 2022)	10/14/2022	n/a	n/a	Non-Public Financial Information, User Data, Forward-Looking Analyses, and Other Commercially Sensitive Information	13:6; 25:11-14; 33:18-21, 23-24; 35:5-6; 37:4-8, 10, 20-22, 38:2-3, 5, 12, 19; 40:8-12; 41:6-7, 10-11; 44:4-16; 44:25-45:7; 45:11-46:7; 47:6-8, 21-25; 48:1-10, 15-18, 23-25; 49:1-5; 51:1-53:9; 53:15, 19-21; 53:25-54:14; 54:22-	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						55:3; 55:15-57:15; 60:4-6, 15-18, 24-25; 61:1-3, 11-12, 21-25; 62:1-63:1; 64:8-12; 69:1-71:19; 72:9-24; 73:13-15, 23-25; 74:1-75:21; 78:1-25; 80:25-83:25; 84:15-25; 85:15-21; 86:8-23; 87:8-91:9; 95:22-97:22; 98:6-25; 102:6-105:3; 105:17-18; 108:3-113:25; 115:18-118:25; 121:7-142:13; 143:8-11, 14; 144:23-145:20; 146:5-151:10; 151:20-152:12; 154:19-22; 155:1-161:25; 170:16-20; 171:20-173:15; 179:15-185:4; 185:14; 188:10-193:17; 194:21-198:2; 199:20-21;		

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						200:1-209:16; 213:8-21; 218:20-22; 219:14-226:18; 227:3-230:18; 231:5-232:18; 235:14-237:12; 238:23-239:7; 241:14-247:7; 258:14; 259:5, 21-25; 260:1-261:1		
PX0053 DX1208	Deposition Transcript of Christopher Pruett (October 11, 2022)	10/11/2022	n/a	n/a	Non-Public Financial Information, User Data, and Other Commercially Sensitive Information	28:16-25; 29:1-2; 36:11-14; 18-25; 37:1-3; 11-19; 42:14, 16; 43:20-25; 44:1-19; 45:5-12; 47:3-8; 47:18-25; 48: 14-25; 49: 3-19; 60:24-25; 61:2-17, 20-25; 62:1-64:25; 70:17-19; 71: 16-20; 24-25; 72: 1-3; 80: 20-25; 81: 5-8, 20-21; 88: 4-8; 92: 9-12, 23-25;	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						93: 1-8, 14-15; 114: 24; 115: 2-6; 12-14; 18-19; 116: 4-10; 25; 117: 1-4, 15-25; 118:1-25; 127: 22-25; 129:24-130:4; 147: 13-20; 151: 19-25; 152: 17-20; 156:6; 162:20- 163:8; 177: 20-23; 198:6-200:22; 202: 23-25; 203: 1-25; 204:3- 11; 207:14-25; 208:2-209:25; 220: 15- 25; 221: 1, 11-22; 222: 1-25; 224:7- 225:12; 238: 2-17; 250:2- 251:19; 261: 9-262:2; 264: 19-24; 271: 11;		

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX0054 DX1198	Deposition Transcript of Andrew Bosworth (October 19, 2022)	10/19/2022	n/a	n/a	Non-Public Financial Information, User Data, Forward-Looking Analyses, and Other Commercially Sensitive Information	26:4-8; 30:18-25; 43:4-5; 46:25-48:7; 49:9-11; 50:25-51:6; 51:14-52:5; 55:5-24; 57:11-58:1; 87:16-92:23; 93:16-95:2; 96:3-103:3; 108:4-109:3; 115:4-8, 17, 19, 21-25; 116:1, 3, 8 129:5; 129:24-130:5; 156:6; 159:8-160:14; 164:5, 10; 181:18; 182:3, 14, 18-24; 189:21-192:23; 196:8-25; 200:5-216:4; 221:25; 222:13-15, 25; 249:3-4; 250: 2, 5, 13, 23 256:14-257:16	Partial	Five Years
PX0055 DX1214	Deposition Transcript of Michael Verdu (October 24, 2022)	10/24/2022	n/a	n/a	Non-Public Financial Information,	18:12-13, 15-16; 33:7-8; 45:5-7, 11, 12; 51:24;	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
					Forward-Looking Analyses, and Other Commercially Sensitive Information	52:2; 68:2; 68:6; 69:11; 71:2, 3, 24-25; 74:19-24; 75:18-19; 76:8-12, 15-17, 21-22; 77:10-11, 20-23; 78:5; 79:2-9; 81:17-19, 21-82:3; 82:11, 16; 87:21; 88:6-7; 89:17-19; 89:23-90:4; 90:17-20; 92:16, 19-20, 24; 93:9-10, 20-21, 24; 94:8; 97:15; 99:9, 14, 20; 100:5, 9, 17; 104:19-22; 105:8-12; 106:10, 12-22; 107:1-2, 7-9; 107:25-108:8; 109:7-12; 109:24-110:4; 110:10-13, 18-20; 111:11-14, 19-20; 112:4-6; 124:12-14; 125:19-25; 126:8-11; 127:3-4, 5-6, 9-10, 15-		

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						18; 127:24-128:5; 128:21-23; 129:2-4, 9-11, 13-18; 129:20-22; 130:20-24; 131:1, 5-15, 22-24; 132:2, 4-11, 21-22; 132:25-133:3; 133:8-16, 20-25; 134:3-7, 16-17; 138:4-5, 9; 139:16; 140:4;140:23-141:2;157:15-20; 158:4, 12-159:19; 170:13-171:19; 172:4-6; 173:6-7; 174:2, 3, 6; 218:23-25; 219:4-5, 7; 245:4-5, 11-12, 16-17, 22-23; 246:8-9, 21; 247:1-2, 19; 248:13-16; 257:23-25; 258:1-2, 20-22; 259:1-3		
PX0056 DX1201	Deposition Transcript of John D. Carmack (October 24, 2022)	10/24/2022	n/a	n/a	Forward-Looking Analyses,	73:10-15, 23; 74:1; 80:20; 81:9, 12; 82:8, 14;	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
					Non-Public User Data, and Other Commercially Sensitive Information	100:22; 101:22-23, 25; 102:1-2; 115:4-5; 117:19, 22-25; 118:1, 9-10, 14-15; 141:11-14; 142:2-9, 18-20, 22-23; 145:7-12, 16-25; 146:1-5; 147:17-24; 149:5-11;		
PX0057 DX1205	Deposition Transcript of Anand Dass (October 20, 2022)	10/20/2022	n/a	n/a	Non-Public User Data, Forward-Looking Analyses, and Other Commercially Sensitive Information	72:2-73:25; 114:10; 124:22; 182:22-184:7; 189:19-205:25; 218:13-19; 219:3-4 223:18-230:10 231:1-237:20 238:12 – 247:1 247:16 – 256:14 257:3 – 265:1 269:9 – 283:25	Partial	Five Years
PX0058 DX1203	Deposition Transcript of Anand Dass 30(b)(6) (October 20, 2022)	10/20/2022	n/a	n/a	Non-Public User Data, and Forward-Looking Analyses	16:13-17:5; 19:8-20:15; 24:9-14; 25:2-13; 26:8-28:25	Partial	Five Years
PX0059 DX1206	Deposition Transcript of Gio Hunt 30(b)(6) (October 26, 2022)	10/26/2022	n/a	n/a	Non-Public Financial Information	22:8-14; 35:15-17 46:12-17, 19-23; 46:24-47:10;	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
					and Commercially Sensitive Information	47:15-24; 69:23-70:13; 79:12-13, 19-20, 23-24; 80:7-11, 23-24; 81:3, 14-17		
PX0060 DX1207	Deposition Transcript of Dorothy Paynter 30(b)(6) (October 25, 2022)	10/25/2022	n/a	n/a	Non-Public User Data; Forward-Looking Analyses; and Other Confidentially Sensitive Information	45:4-7, 13-17, 22-25; 46:1-9; 50:17-18, 23-25; 51:1; 54:7-12; 55:6-12; 57:17-18, 21-25; 58:1; 60:5-12, 16-23; 62:6-11; 66:19-21	Partial	Five Years
PX0063 DX1210	Deposition Transcript of Mark Rakbin (October 26, 2022)	10/26/2022	n/a	n/a	Non-Public Financial Information, Forward-Looking Analyses, and Other Confidentially Sensitive Information	57:24-25; 58:1-2, 15-19, 22-23; 61:21-25; 64:18-20; 65:4-25; 66:1-25; 67:1-16; 81:6-84:13; 94:2-95:25; 97:7-10, 18-25; 98:1-100:20; 106:24-25; 107:1-16, 20-25; 108:17-25; 109:1-7; 111:4-25; 112:1-140:5; 148:1-149:16; 150:8-25; 151:1-153:7; 154:17-25;	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						155:1-161:23; 162:20-25; 163:1-198:20; 200:17-25; 201:1-6; 202:11-25; 203:1-209:17; 210:20-25; 211:1-227:19; 229:21-23		
PX0064 DX1209	Deposition of Transcript of Mark Rabkin 30(b)(6) (October 26, 2022)	10/26/2022	n/a	n/a	Non-Public Financial Information, Forward-Looking Analyses, and Other Commercially Sensitive Information	29:24-25; 30:1-8, 17-25; 31:1-5; 33:20-22; 34:16-25; 35:1-16, 23-25; 36:1-9, 17-23	Partial	Five Years
PX0066 DX1211	Deposition Transcript of Jason Rubin (October 28, 2022)	10/28/2022	n/a	n/a	Non-Public Financial Information, Forward-Looking Analyses, and Other Commercially Sensitive Information	24:13, 24; 25:1-2, 22; 26:2; 27:9-10; 35:16-19; 53:20-22; 54:2-54:7; 55:8-21; 57:6-8, 13-18; 58:7-10, 14-17; 60:16-18, 22-24; 61:2, 4-10; 62:23-25; 63:3, 7, 18; 64:19-20, 24-25; 65:4-5; 66:24-67:5; 93:16-17,	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						20-21; 93:23-94:4; 94:20-23; 95:5-8, 12-18; 97:4-14; 97:19-98:1; 98:4-16; 114:14-15; 140:24-141:8; 142:7:17; 152:16-18, 23-24; 153:15-16; 153:24-154:2 154:5-7, 12-15, 18-20; 155:3-8, 16-18; 155:24-156:1; 156:11-13, 15-16; 156:24-157:1; 157:16-22; 158:4-5, 12-14; 158:24-159:8, 13-16; 160:1-5, 8-12; 160:25-161:3; 161:6-7, 19-24; 162:3-4, 13, 19-21 162:25-163:2; 163:6-7, 10-11, 16-20, 22-24; 164:5-6, 12-13, 17-25; 165:1-3, 5-10; 166:20-21;		

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						169:18-19; 169:24-170:5; 173:21-22; 174:8-17, 19-22; 175:7-11 176:3-6; 177:2, 5-6 178:12, 15-16, 21-22; 178:15-16, 21-22; 179:1-4, 11-22 180:2-10, 12-17 180:23-181:1; 182:22-23; 183:7-11; 188:11-13, 22-25; 189:15-18; 190:5-14; 190:17-191:25; 192:22-24 193:4-23; 194:18-22, 25; 195:14; 196:6-19; 197:14-20; 198:18-20; 198:25-201:2; 201:24; 202:11-19 203:4-9, 11-15; 203:19-204:3; 204:4-7; 207:7-11, 12-19;		

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						209:20-210:7; 210:20-22; 211:22; 220:4-12, 19-21; 233:13-25; 241:14-17; 242:22-24; 243:6- 8, 16-22		
PX0067	Deposition Transcript of Melissa Brown (October 21, 2022)	10/21/2022	n/a	n/a	Non-Public Financial Information, User Data, Forward-Looking Analyses, and Other Commercially Sensitive Information	42:16, 19; 46:7-9; 47:11-14, 21-24; 48:3-9; 49:18-21; 52:11-54:5; 54:18-20; 55:1-2; 55:24-56:6; 56:14-58:5 59:8; 61:1-2; 63:23-65:6; 65:16-67:12; 68:8, 12-13; 69:24-25; 70:15, 19, 21-22, 24; 71:14-15, 18-23; 72:20, 24; 73:14; 74:18-19; 75:11- 76:3; 76:11-77:6; 77:17-78:2; 78:8- 14; 78:21-79:10; 84:9-85:10; 85:14-86:9; 86:16-87:14; 87:19-88:22;	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						89:1-3; 89:19-90:15; 92:23-25; 96:1-99:17; 100:4-10; 105:1-4, 7-17; 107:7-25; 109:6-17 109:22-110:8; 110:14-20; 111:12-112:8; 112:24-113:9; 113:23-117:8; 125:13-126:3; 126:17-127:6; 128:8-24; 129:8-130:3; 131:16-133:12; 136:20-21; 138:17-20; 139:2-140:20; 141:10-142:3; 142:9-143:9; 144:1-9, 17-19; 145:1-146:1; 146:4-147:14; 148:15-19; 148:21-150:3; 150:12-151:7; 151:15-19; 154:9-155:8; 155:13-156:25; 158:12-161:11, 17-21;		

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						162:1-163:22; 164:1-7; 164:14-165:15		
PX0068 DX1200	Deposition Transcript of Melissa Brown – 30(b)(6) (October 26, 2022)	10/26/2022	n/a	n/a	Non-Public Financial Information, Forward-Looking Analyses, and Other Commercially Sensitive Information	11:13-14, 16; 12:2, 3-4, 7, 9-16, 20-21; 13:17-18, 20; 14:15-16; 15:11-12, 20; 16:3-5, 10-1, 13, 16-18, 20-22 16:24-17:1, 8; 20:13-16; 22:20-22; 23:3-6; 26:3-5, 7-8, 17-18; 27:3-6, 23-25; 28:5-7; 31:7-9, 18-20; 32:18-21; 33:19-20, 23-25; 34:2-4, 6-7, 16 17, 20-25; 35:2-4, 6-8, 10-13, 15-21; 36:11-12, 20-24; 36:25-37:1; 37:3-6, 8-9, 11-13, 16-18. 20-24; 38:1, 9-10, 12-14; 39:4-5, 7-10, 13-16; 39: 17-19, 23-24; 40:1-3, 5-6, 8-9,	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						11-12, 14-16, 18-20, 20-24; 40:25-41:3; 41:5-6, 8-9, 11-13, 15-16, 18-19, 21-23; 41: 25-42:2; 42:4-11, 15-16, 18-19, 21-25; 43:2-3; 47:13, 18 48:3, 5-6, 9-10, 25; 49:2-3, 6-9; 50:2, 12-13, 15 16, 17, 22-25		
PX0069 DX1202	Deposition Transcript of Jane Chiao (November 4, 2022)	11/4/2022	n/a	n/a	Forward-Looking Analyses and Other Confidentially Sensitive Information	73:19, 21-23, 75:22-25, 76:1, 78:2-3, 80: 24-25, 81: 1-8, 10, 14-17, 23, 95:6-7, 119:2-5, 7-8, 10-11, 14-15, 17-21, 120:12-13, 123:19-22, 124:11-12, 14-15, 17-19, 22-23, 125:4-5, 139:1, 5, 17-18, 140:12-13, 19, 24, 141:1-2, 4, 13, 19, 142:7-8, 16, 19, 143:19-20, 145:9-14, 164:24-165:1, 6-	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
						7, 10-14, 166:13-14, 167:19-20, 170:6-9, 11-15, 184:6-8, 11-18, 185:2, 4-5, 190:18-19, 191:9-10, 13, 191:17-25, 192: 1-6, 10-12, 192:14-17, 221: 21-22		
PX0071 DX1212	Deposition Transcript of Jason Rubin 30(b)(6) (October 28, 2022)	10/28/2022			Non-Public Financial Information, Forward-Looking Analyses, and Other Commercially Sensitive Information	36:12-16, 20-21; 44:6, 10; 45:3-4, 18 46:16; 47:7, 18; 48:19; 49:23; 51:3, 12, 16, 24; 52:1, 16-17; 53:1, 9; 56:24; 57:3, 11, 16, 19; 64:12-16		
PX0077 DX1197	Deposition Transcript of Jaroslav Beck (November 16, 2022)	11/16/2022	n/a	n/a	Forward-Looking Analyses and Other Commercially Sensitive Information,	71:11-22; 114:14-117:3; 123:10-13; 125:21-126:17; 130:20-132:25		

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
n/a	Deposition Transcript of Dennis Carlton (December 1, 2022)	12/1/2022	n/a	n/a	Non-Public User Data, Financial Information, Forward-Looking Analyses, and Other Commercially Sensitive Information	180:25; 181:17, 21; 182:4-5, 13-17, 21-22, 25; 183:1, 23; 184:14; 186:22; 190:6-8; 247:21-23; 248:14-15; 267:20-21; 268:1-2, 9-11, 12-13; 272:5-6; 274:4-5, 10-11, 18-19; 279:6-7, 9-13, 15-23; 281:8-9; 284:12-14;	Partial	Five Years
n/a	Deposition Transcript of Jean-Pierre Dubé (December 2, 2022)	12/2/2022	n/a	n/a	Non-Public User Data	101:2, 10, 18; 103: 15, 109: 18; 118:11, 13, 14, 18, 19; 122: 24; 123: 13–15; 129: 3; 133: 5, 21; 137: 5, 23; 138: 18–19; 143: 10, 16; 175: 24	Partial	Five Years
n/a	Deposition Transcript of Michael Zyda	12/2/2022	n/a	n/a	Non-Public Financial	48: 5–7; 49:4-6, 19-20; 105: 16–	Partial	Five Years

Exhibit Number	Description	Date	BegBates	EndBates	Category	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
	(December 2, 2022)				Information and User Data, and Other Commercially Sensitive Information	18; 106: 21; 23–25; 107:4-5, 17; 108:22-23; 109: 4–6; 11; 111:18; 113: 5–6; 19–20; 24; 127:7, 12, 18; 138: 5–6; 142:22-23; 143: 2; 13–14; 20; 144: 3; 6–7; 158:23-24; 159:3-5; 161:3-4, 19; 162:7-11; 163:14-15; 164:9-10, 16-17; 247: 18–19		

Exhibit B

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF THE ADMINISTRATIVE LAW JUDGES

_____)	
In the Matter of)	
)	
Meta Platforms, Inc., et al.)	Docket No. 9411
)	
Respondents.)	PUBLIC
)	
_____)	

DECLARATION OF BARBARA BLANK IN SUPPORT OF RESPONDENT META PLATFORM, INC.’S MOTION FOR *IN CAMERA* TREATMENT

I, Barbara Blank, declare as follows:

1. I am Director and Associate General Counsel for Competition & Regulatory at Meta Platforms, Inc. (“Meta”). I have personal knowledge of the facts set forth in this declaration and if called as a witness I could and would testify competently to such facts.

2. I am familiar with the materials listed in Exhibit A to Meta’s Motion for *In Camera* Treatment, which are the likely trial exhibits in the above-captioned matter.

3. Given my position at Meta, I have personal knowledge of the competitive significance to Meta of the categories of information described below, and the level of confidentiality associated with those materials. Based on that knowledge, as well as my review of Exhibit A, my conversations with individuals that reviewed these materials at my direction, and my understanding of Meta’s business, I submit that public disclosure of the information for which Meta seeks *in camera* treatment would result in a clearly defined, serious injury to Meta or reveal sensitive personal information.

4. In the ordinary course of business, Meta treats each category of information identified below as strictly confidential. Meta does not publicly disclose this information, and it

takes reasonable steps to protect it from disclosure, potentially including limiting the information's availability.

5. Meta's request for *in camera* treatment is narrowly tailored. Counsel for Meta carefully reviewed the materials in Exhibit A and, wherever possible, proposed redactions, rather than sealing the entire exhibit.

6. For ease of reference, Meta has grouped the exhibits identified in Exhibit A into the following categories, which are further described below:

- a) Category 1 – Forward-Looking Analyses
- b) Category 2 – Non-Public Financial Information
- c) Category 3 – Non-Public User Data
- d) Category 4 – Other Commercially Sensitive Information

7. **Category 1 – Forward Looking Strategic Analysis**

- a) **Description:** This category covers documents that contain forward-looking strategic analyses of Meta's business. Among other things, the documents covered by this category discuss confidential Meta development projects, including the timelines for the development and release of new hardware or software features for Meta products, such as the release of software developer kits. The category also covers documents discussing Meta's non-public plans for new content in virtual reality ("VR") and augmented reality ("AR") developed by both Meta internal teams as well as third parties, such as adaptations of existing Meta-owned games. In addition, the category covers discussions of potential partnerships with third parties, including connected fitness brands. The material in this category also details Meta's technical development

capabilities, such as its ability to alter Meta-owned apps to new use cases. All of this information reflects Meta's highly confidential, competitively sensitive business strategy.

- b) **Confidential treatment at Meta:** Meta does not share the materials covered by this category widely within the company, and Meta has taken steps to protect disclosure in *FTC v. Meta Platforms, Inc.*, No. 5:22-cv-04325-EJD (N.D. Cal. July 7, 2022), the related preliminary injunction proceeding.
- c) **Harm from public disclosure:** Public disclosure of this forward-looking, strategic analysis would significantly harm Meta because it would give Meta's actual and potential competitors unfair access to Meta's proprietary plans and strategy, allowing them to replicate the company's content before Meta is able to complete development.
- d) **Timing:** The materials covered by this category were generally created within the past three years. The substance of the information is forward-looking and explicitly implicates competitive activity five or more years in the future. As such, this material will remain competitively sensitive for at least the next five years.

8. **Category 2 – Non-Public Financial Information**

- a) **Description:** This category covers documents that contain financial information, including information pertaining to Meta's finances and financial relationships with third parties. The documents in this category reflect profits and sales generated by applications, including datasets of revenues for Meta-owned and third party apps. The category also includes discussions of Meta's

internal allocation of funds, such as funding proposals for specific VR use cases. Additionally, the category covers financial arrangements with third parties, such as Meta's financial support of third-party developers.

- b) **Confidential treatment at Meta:** Meta does not share the materials covered by this category widely within the company, and Meta has taken steps to protect disclosure in *FTC v. Meta Platforms, Inc.*, the related preliminary injunction proceeding.
- c) **Harm from public disclosure:** Public disclosure of this non-public financial information would significantly harm Meta because it would undermine Meta's ability to negotiate with third parties. It would also provide the company's actual and potential competitors with insight into its proprietary business strategy.
- d) **Timing:** The materials covered by this category were generally created within the past three years. The substance of the information implicates Meta's current and future competitive activity for the next five or more years. Accordingly, this material will remain competitively sensitive for at least the next five years.

9. **Category 3 – Non-Public User Data**

- a) **Description:** This category covers documents and datasets containing application user data. The material in this category reveals competitively sensitive usage patterns and preferences, including data reflecting time spent on applications.
- b) **Confidential treatment at Meta:** Meta does not share the materials covered by this category widely within the company, and Meta has taken steps to

protect disclosure in *FTC v. Meta Platforms, Inc.*, the related preliminary injunction proceeding.

- c) **Harm from public disclosure:** Public disclosure of this non-public material would significantly harm Meta as it would provide the company's actual and potential competitors with data to inform their content development and marketing strategies. Such disclosure would also constitute an improper release of user's personally generated confidential data.
- d) **Timing:** The materials covered by this category were generally created within the past three years. The substance of the information implicates Meta's current and future competitive activity for the next five or more years. This data will remain competitively sensitive for at least the next five years.

10. **Category 4 – Other Commercially Sensitive Information**

- a) **Description:** This category covers documents containing commercially sensitive information regarding Meta's competitive assessment of third parties and the company's broader business strategies. The documents in this category discuss potential transactions, including the Transaction at issue in this matter. Other documents discuss Meta's assessment of the competitive landscape in specific VR use cases, such as fitness.
- b) **Confidential treatment at Meta:** Meta does not share the materials covered by this category widely within the company, and Meta has taken steps to protect disclosure in *FTC v. Meta Platforms, Inc.*, the related preliminary injunction proceeding.

- c) **Harm from public disclosure:** Public disclosure of this information would disadvantage Meta in future transactions and allow actual and potential competitors to develop commercial strategies to competitively undermine Meta.
- d) **Timing:** The material covered by this category was generally created within the past three years. The substance of the information implicates Meta's current and future competitive activity for the next five or more years. This data will remain competitively sensitive for at least the next five years.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 23, 2022.

DocuSigned by:
Barbara Blank
0530D1F0F171475...
Barbara Blank