December 20, 2024

E-Filed

The Honorable Thomas S. Hixson United States District Court for the Northern District of California San Francisco Courthouse, Courtroom E – 15th Floor 450 Golden Gate Avenue San Francisco, CA 94102

Re: Kadrey, et al v. Meta Platforms, Inc.; Case No. 23-cv-03417-VC (TSH)

Dear Magistrate Judge Hixson:

Plaintiffs and Defendant Meta Platforms, Inc. ("Meta") jointly submit this letter brief regarding Meta's third and fourth sets of privilege logs, produced on December 13 and 16, 2024, respectively. The parties met and conferred on December 17, 2024, but were unable to reach a resolution.

I. PLAINTIFFS' STATEMENT

Meta's efforts to withhold business documents and business advice under the guise of attorney-client privilege continue unabated. See Dkt. Nos. 269; 309; 319. Less than two hours before the close of fact discovery on December 13, Meta served its third set of privilege logs, comprising 1,919 new entries. Then, on Monday, December 16, Meta served a fourth log with 57 more entries. Like Meta's other privilege logs, these massive, last-minute logs contain hundreds of entries reflecting privilege claims that both fail to substantiate any actual "legal advice" requested or provided by counsel rather than business discussion and analysis, and fail the "primary purpose" test. Attached as **Exhibit A** are the privilege log entries for the documents that Plaintiffs challenge (the "Challenged Documents"), many of which contain no identified attorneys whatsoever; many others that appear to reflect minimal attorney involvement; and none of which appear to involve privileged communications as opposed to business considerations and analyses.

Attorney-client privilege "must be strictly confined within the narrowest possible limits consistent with the logic of its principles." Sierra Club, Inc. v. United States Fish & Wildlife Serv., 925 F.3d 1000, 1011 (9th Cir. 2019). The privilege "applies only where necessary to achieve its purpose" and "protects only those disclosures necessary to obtain informed legal advice which might not have been made absent the privilege." Fisher v. United States, 425 U.S. 391, 403 (1976). Meta bears the burden of proving privilege applies. Vasudevan Software, Inc. v. IBM Corp., 2011 WL 1599646, at * 1 (N.D. Cal. Apr. 27, 2011). Meta fails to do so for the Challenged Documents.

A. Meta's Log Entries Fail To Establish Privilege Over Hundreds of Logged Documents.

Meta's privilege logs are deficient on their face for the majority of the Challenged Documents. A privilege log must identify (a) the attorney and client involved, (b) the nature of the document, (c) all persons or entities shown on the document to have received or sent the document, (d) all persons or entities known to have been furnished the document or informed of its substance, and (e) the date the document was generated, prepared, or dated. Dozens of entries in Meta's logs do not identify a single attorney in the "Author/From," "To," or "CC" columns, or any attorneys by name in the "Legal Source" column. Instead, the "Legal Source" is vaguely identified as "MPI In-House Legal Counsel." *See* Ex. B (showing the subset of Challenged Documents where no specific attorney is listed as the "Legal Source"). ¹

This practice is insufficient. Privilege assertions must identify attorneys by name—mere references to "counsel" fail to state a prima facie claim of privilege. See, e.g., Laatz v. Zazzle, Inc., 2024 WL 3849348, at *2 (N.D. Cal. Aug. 15, 2024) (prima facie showing requires "identif[ying] the attorney involved"). General references to some communication with unnamed in-house counsel are insufficient to withhold documents. See, e.g., Elan Microelectronics Corp. v. Apple, Inc., 2011 WL 3443923, at *5–6 (N.D. Cal. Aug. 8, 2011) (logs deficient when they fail to identify attorneys by name); Palmer v. Cognizant Tech. Sols. Corp., 2021 WL 3145982, at *12 (C.D. Cal. July 9, 2021) (ordered to amend log by "providing the name of the attorney(s) involved and stating where in the email chain/document the attorney(s) was involved"). Meta thus failed to substantiate its privilege claims for these documents and the Court should hold that Meta thereby waived any privilege over them. See Apple Inc. v. Samsung Elecs. Co., 306 F.R.D. 234, 237 (N.D. Cal. 2015).

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¹ The Challenged Documents also include a small number where: the named "Legal Source" is not on Meta's list of counsel; the author is "anonymous"; and "legal advice" is being sought from a non-attorney.

B. Meta Withholds Hundreds of Business Documents Without Attorney Involvement.

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The Challenged Documents appear to involve primarily business matters. But the privilege only covers legal advice, i.e., what is legally permissible and impermissible; "that's it." Epic Games, Inc. v. Apple Inc., 2024 WL 4947269, at *1 (N.D. Cal. Dec. 3, 2024). It doesn't cover inhouse counsel's involvement or input on business considerations and analyses, let alone things like "business analys[e]s and recommendation[s] for how to comply with a legal requirement." *Id.*

"[D]ual purpose communication[s] can only have a single primary purpose." In re Grand Jury, 23 F.4th 1088, 1091 (9th Cir. 2022). For communications that "may relate to both legal and business advice, the proponent of the privilege"—here, Meta—"must make a 'clear showing' that the 'primary purpose' of the communication was securing legal advice." Dolby Lab'ys Licensing Corp. v. Adobe Inc., 402 F. Supp. 3d 855, 873 (N.D. Cal. 2019). Meta's paltry attempts to give the Challenged Documents the gloss of legal advice through vague statements that a document "reflects" such advice and passing references to legal considerations fall far short of satisfying the "primary purpose" test. See, e.g., Wisk Aero LLC v. Archer Aviation Inc., 2023 WL 2699971, at *6 (N.D. Cal. Mar. 29, 2023); Illumina Inc. v. BGI Genomics Co., 2021 WL 2662074, at *4 (N.D. Cal. June 29, 2021) (a "businessperson's statement that the company needs to assess legal risk as part of its SWOT analysis is not privileged" and a "slide deck that mentions potential legal risk twice in passing is not how a company asks for legal advice").

Meta's catch-all "MPI In-House Legal Counsel" is again the primary offender. Dozens of withheld documents purportedly reflect legal advice from unspecified attorneys and conveyed by non-attorneys. For example, Log No. 277 in Meta's Third Privilege Log (Emails) is described as a "chat reflecting legal advice concerning copyright issues." But the chat is authored by nonattorney Melanie Kambadur, a research manager, and sent only to non-attorney Thibaut Lavril, an engineer. Apparently, this is what "MPI In-House Legal Counsel" refers to. But there also is another, more accurate phrase to describe "MPI In-House Legal Counsel": business communications. In other words, Meta attempts to have privilege "descend like a giant fog bank over every document that is in some"—here, unidentified—"way connected with an effort to achieve legal compliance." Epic Games, 2024 WL 4947269, at *1.

Moreover, the surrounding context in many of Meta's partially-redacted Challenged Documents make their primary business purpose abundantly clear. As just a few examples²:

- Meta Kadrey 00097364. This presentation titled " "has redactions on the introductory "Context" slide.
- Meta Kadrey 00096657. This document reflects notes from an "AI Sync" among businesspeople. An entire ½ page section under " is redacted.
- Meta Kadrey 00209461. This email is between a research scientist and a communications manager and just concerns a comms strategy for product launches.

Because Meta's logs fail to establish privilege over Challenged Documents and, regardless, the Challenged Documents primarily (or exclusively) involve business considerations and analysis, the Court should order their production. The Court should also order Meta to re-review its other redacted and withheld documents in light of the Court's ruling and re-produce similar documents.

² Due to page limitations, Plaintiffs are unable to provide more examples here but can do so upon request.

II. DEFENDANT'S STATEMENT³

Plaintiffs' seriatim challenges to Meta's privilege redactions as allegedly covering business advice are based on an erroneous statement of the law and otherwise lack merit. Plaintiffs argue here again that the "primary purpose" test has to be measured against a document as a whole, and that the attorney-client privilege cannot apply to part of a document. But this Court has ruled that is not correct. (ECF 351) (citing United States v. Chevron Corp., 1996 WL 444597, *2 (N.D. Cal. May 30, 1996).) Thus, Meta may assert the attorney-client privilege over isolated sentences or paragraphs within a document. See id.; see also In re Meta Pixel Healthcare Litigation, 2024 WL 3381029, *6 (N.D. Cal. July 10, 2024) (approving redactions for attorney-client privilege). Plaintiffs' challenge, like their earlier one, should be denied.

Plaintiffs again seek review of *hundreds* of entries on Meta's privilege log based on the same erroneous legal standard, as well as on mere speculation that a withheld document that does not expressly name an attorney in the "Legal Source" column is per se business and not legal related. These arguments provide no basis for invading Meta's privilege or even for permitting in camera review. As the Supreme Court has made clear, in camera review is permitted only where a challenger presents a factual basis to support its challenge. See United States v. Zolin, 491 U.S. 554, 571-72 (1989). Plaintiffs' bare list of 287 documents and arguments under the wrong legal standard fall far short of that burden. Relief should be denied.

An in camera review of privileged documents "is an intrusion which must be justified." In re Grand Jury Investigation, 974 F.2d 1068, 1074 (9th Cir. 1992). The challenging party must present a factual basis sufficient to support a reasonable, good faith belief that an in camera inspection may reveal evidence that the materials are not privileged. Id. at 1074-75 (discussing Zolin, 491 U.S. at 569-572). Here, Plaintiffs have simply provided a list of 287 documents and made generalized, speculative arguments. Notably, Plaintiffs' list of challenged documents includes: documents where attorneys are identified as the "Legal Source" (See, e.g., Ex. A, Entry 342); documents redacting portions labeled clearly as "Legal Risks" (in the unredacted portion); a document including "Product Liability Risk" in its title, attached to an email from an attorney (id., Entry 584); and documents that are clearly legal hold notices (id., Entry 68, 249, 252). That such plainly privileged documents are on Plaintiffs' list only underscores its impropriety.

Plaintiffs also seek to challenge documents where a non-attorney Meta employee (i.e., the client) was describing legal advice received or needed from an attorney in Meta's in-house legal department without naming the attorney (e.g., "Legal said we should do 'x'..."). For such situations—as Meta has told Plaintiffs—Meta's log uses the identifier "MPI In-House Legal Counsel" in the "Legal Source" column to identify the source as an attorney within Meta's inhouse legal team. 4 Notably, Meta's in-house team includes approximately 1,500 attorneys who are

³ Following the parties' meet and confer on December 17, Meta conducted a document-bydocument re-review of the list of documents Plaintiffs stated they would challenge and agreed to reproduce some additional documents without or with fewer redactions, as well as to update its privilege log with additional names of the attorneys under Legal Source.

⁴ Plaintiffs challenge 7 documents even though a Meta attorney is specifically identified: Jennifer Newstead, Mo Metanat, Robert Vega, Korey Anvaripour, and Victoria Ajayi. Ex. A, Entry, 158, 159, 342, 418, 658, 1065, 54. A simple search - or question to the undersigned - would have confirmed these are Meta attorneys. Plaintiffs' challenge to these documents is frivolous.

consulted daily on legal matters. Plaintiffs' demand to identify individual attorneys underlying each reference to "Legal" would require Meta to conduct a separate investigation into each document. This effort would be entirely disproportional to the needs of this case, particularly when the document is otherwise sufficiently identified and shown to be privileged. For example, a recent District Court opinion from the Northern District of Illinois addressed this issue of large in-house legal teams and correctly found privilege logs sufficient where they identify a client's inhouse legal team as the attorney(s). See Washtenaw Cnty. Emps. 'Ret. Sys. v. Walgreen Co., No. 15 C 3187, 2020 WL 3977944, at *5 (N.D. Ill. July 14, 2020).⁵

Plaintiffs' cited authority does not require more. In Laatz v. Zazzle, Inc., it was unclear that there were any in-house legal counsel involved, let alone that counsel was the source of the advice at issue. No. 22-cv-04844, 2024 WL 3849348, at *2 (N.D. Cal. Aug. 15, 2024). Similarly, Elan Microelectronics Corp. v. Apple, Inc., 2011 WL 3443923, at *5-6 (N.D. Cal. Aug. 8, 2011), involved entries regarding "communications with Elan's 'legal' department withheld on the basis of attorney-client privilege even though the department does not include any licensed attorneys." And the court in Palmer v. Cognizant Technology Solutions Corp., No. CV 17-6848, 2021 WL 3145982, at *12 (C.D. Cal. July 9, 2021), found that the challenging party did not even meet the standard for in camera review, let alone the draconian relief sought by Plaintiffs of waiver of all privilege in these documents. Finally, Apple Inc. v. Samsung Electronics Co., 306 F.R.D. 234, 237 (N.D. Cal. 2015), is not about the lack of identification of each legal source by name.

In short, Meta did identify the source of legal advice for all of its privilege assertions (including, where relevant, "MPI In-House Legal Counsel"). Plaintiffs have not provided any iustification for forcing Meta to undertake the incredibly burdensome process of investigating every document to name the attorney on Meta's in-house legal team who provided the advice, particularly when the other information provided to Plaintiffs confirms the document is privileged.

In addition, as before (ECF Nos. 309, 336), Plaintiffs challenge documents where nonattorneys are discussing legal advice or plans to seek legal advice. But the attorney-client privilege protects non-attorney communications made "for the purpose of facilitating the rendition of professional legal services." In re Grand Jury, 23 F.4th 1088, 1092-93 (9th Cir. 2021) (citations omitted). "Courts in the Ninth Circuit have determined that 'the attorney-client privilege is not lost where non-attorney employees [i.e., the client] engage in communications primarily for the purposes of transmitting information to legal counsel so they may provide legal advice or disseminating information from legal counsel to the employees of the corporation." PUMA SE v. Brooks Sports, Inc., No. 2:23-CV-00116, 2024 WL 4476767, at *3 (W.D. Wash. Oct. 11, 2024). As is particularly relevant for many of the documents challenged here, legal advice may be transmitted "between non-attorneys ... so that the corporation may be properly informed of legal advice and act appropriately." MGA Ent., Inc. v. Nat'l Prods. Ltd., No. CV 10-07083, 2012 WL 3150532, at *4 (C.D. Cal. Aug. 2, 2012) (protecting from disclosure "emails explicitly referred to

⁵ As Washtenaw explains, that the in-house attorneys are not identified "does not defeat the privilege claim or trigger in camera review. Depending on the complexity of the issues and the size of the corporation, identifying each advising attorney as to each email may be difficult and even cost-prohibitive." Id. Moreover, "[t]he lack of identification of these attorneys does not engender a disbelief in the veracity of the log entries sufficient to require in camera review. In any event, the Court is not persuaded that further identification of the lawyers who gave the advice is proportional to the needs of the case at this time." Id.

counsel, were sent in furtherance of the defense of this action, and appear to have been made in confidence").

Finally, Plaintiffs' three specific examples—again, out of 287 documents with no specific showing—fail to demonstrate a factual basis for *in camera* review, let alone disclosure. To begin, none of these documents are being withheld in full; they are partially, surgically redacted. Meta_Kadrey_00097364 includes on its cover the statement that the presentation "

"The redactions in Meta_Kadrey_00096657 that reflect legal advice on copyright issues would make sense given this section's discussion of the "

Likewise, it is unsurprising that there would be references to privileged legal communications and advice in an email discussing communications strategy for a product announcement, such as in Meta Kadrey 00209461.

The Court should deny Plaintiffs' motion seeking production of *hundreds* of Meta's privileged documents—a motion based on the wrong legal standard and speculation. Should the Court consider granting this motion, Meta requests additional briefing (including an opportunity to provide declarations) and/or consideration of less draconian relief. As a party can substantiate a claim of privilege by other means, *Apple Inc.*, 306 F.R.D. at 237, granting Plaintiffs' requested relief without any opportunity to cure—based on a 5-page letter brief—would be manifestly unjust.

III. PLAINTIFFS' REPLY

Meta relies on outdated precedent in *United States v. Chevron Corp.*, 1996 WL 444597, at *2 (N.D. Cal. May 30, 1996), decided decades before the Ninth Circuit adopted the primary purpose test. *See In re Grand Jury*, 23 F.4th 1088, 1090 (9th Cir. 2021) (observing, "the natural implication of this inquiry is that a dual-purpose communication can only have a single 'primary' purpose."). Plaintiffs note this Court's adherence to *Chevron* in Dkt. No. 351, but respectfully submit that *Chevron* has been abrogated in relevant part by *In Re Grand Jury*, a case that is especially probative with respect to attempts to redact discrete excerpts from business documents.

As such, this Court has repeatedly held that discrete sections of overwhelmingly business-related documents cannot be properly redacted based on an attenuated connection to legal advice. See Wisk Aero LLC v. Archer Aviation Inc., 2023 WL 2699971, at *6 (N.D. Cal. Mar. 29, 2023) (applying In Re Grand Jury and overruling privilege claims over set of comments mentioning legal risk). Meta's attempt to shield discrete portions of business documents cannot be squared with the primary purpose test. Meta emphasizes brief references to "Legal Risks" and "Product Liability Risk," including employees' attempts to weigh in on risks without the involvement of counsel, in the challenged documents. This ignores Illumina Inc. v. BGI Genomics Co., 2021 WL 2662074, at *4 (N.D. Cal. June 29, 2021) (overruling privilege claims over mere mentions of "legal risk").

Meta also cites to *In re Meta Pixel Healthcare Litig.*, 2024 WL 3381029, at *6 (N.D. Cal. July 10, 2024). There, the Court relied heavily on the fact that Meta "identified the attorneys involved in the communications." *Id.* Meta repeatedly fails to do the same here—indeed, Plaintiffs selected the documents at issue here largely because Meta did *not* identify individual attorneys. Even where Meta names individuals as the "Legal Source," many of those individuals do not appear on the list of attorneys Meta provided Plaintiffs for exactly this purpose. As such, there is no *prima facie* privilege assertion over the withheld documents. The documents at issue are business documents, not legal ones. They primarily advance Meta's business goals of obtaining massive amounts of data to train its AI models. Meta should not be able to keep Plaintiffs in the dark about the relevant decision-making.

By: /s/ Bobby Ghajar

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)

I hereby attest that I obtained concurrence in the filing of this document from each of the other signatories. I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 20, 2024 BOIES SCHILLER FLEXNER LLP

/s/ Maxwell V. Pritt

Maxwell V. Pritt Reed Forbush Jay Schuffenhauer

Attorneys for Plaintiffs

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EXHIBIT A

riv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relations
8									9/28/2023 21:33	Email providing legal advice concerning copyright and open source issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
24									10/24/2022 2:51	Email Chain seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
	Meta_Kadrey_00218 164	Meta_Kadrey_00218	3						2/23/2023 21:22	Document reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
31									2/28/2024 22:33	contract issues Chat reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	StandAlone Document
	Meta_Kadrey_00218 170	Meta_Kadrey_00218 170	3							Chat reflecting legal advice concerning copyright and data privacy issues		MPI In-House Legal Counsel			Privileged - Redact		StandAlone Document
35									2/27/2024 21:34	Email providing legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	StandAlone Document
36									12/7/2022 22:02	Chat reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	StandAlone Document
37	Meta_Kadrey_00218 177	Meta_Kadrey_00218 177	3						2/23/2024 4:45	Chat seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact		Parent
	Meta_Kadrey_00218 178	Meta_Kadrey_00218 177	3						2/23/2024 4:45	Document seeking legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Attachment
	Meta_Kadrey_00218 183	Meta_Kadrey_00218 183	3						1/3/2024 23:50	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	StandAlone Document
	Meta_Kadrey_00209 872	Meta_Kadrey_00209 871	•						1/16/2024 21:37	Document reflecting legal advice concerning copyright, privacy, and regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
	Meta_Kadrey_00209 907	Meta_Kadrey_00209 905	•						7/6/2023 14:12	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
46	Meta_Kadrey_00094 881	Meta_Kadrey_00094 880							1/15/2024 5:14	Document reflecting legal advice concerning copyright, privacy, and regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
	Meta_Kadrey_00209 929	Meta_Kadrey_00209 927							7/6/2023 12:06	Document reflecting legal advice concerning copyright, data privacy, and safety issues		MPI In-House Legal Counsel			Privileged - Withhold		Attachment
68									10/11/2023 14:03	Email reflecting legal advice concerning this litigation	Attorney Client; World Product	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document

Priv Log No.	. Bates No.	BegAttach	Custodians	Author/From	То	СС	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationship
73									9/18/2023 14:21		Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	StandAlone
										concerning copyright issues		Counsel					Document
91	Meta_Kadrey_00208	Mate Kedeau 00000							5/19/2023 0:40	Email providing legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	StandAlone
91	844	844							5/19/2025 0:40	advice concerning	Attorney Client	Counsel			Privileged - nedact	EMML	Document
										copyright issues							
130		Meta_Kadrey_00231 275							5/4/2023 16:10	Chat reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	WP Chats	StandAlone
	2/5	2/3								advice concerning copyright and open source		Counsel					Document
										issues							
133	Meta_Kadrey_00231 279	Meta_Kadrey_00231 277							12/8/2022 0:31	Image reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
	2/9	211								copyright issues		Counsel					
149	Meta_Kadrey_00209 026	Meta_Kadrey_00209 018							3/20/2023 20:58	Document reflecting legal	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
	026	018								advice concerning contract issues		Counsel					
153	Meta_Kadrey_00209								1/4/2024 8:01	Email Chain reflecting	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	StandAlone
	314	314								legal advice concerning		Counsel					Document
										copyright issues							
156	Meta_Kadrey_00094	Meta_Kadrey_00094							6/30/2023 7:01	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	828	825								advice concerning		Counsel					
										copyright, data privacy, and safety issues							
158									5/17/2023 18:23	Document providing legal	Attorney Client	MPI In-			Privileged - Withhold	EMAIL	Attachment
										advice concerning copyright, data privacy,		House Legal Counsel					
										and safety issues		Courses					
160									5/5/2023 23:47	Document providing legal advice concerning	Attorney Client	MPI In- House Legal			Privileged - Withhold	EMAIL	Attachment
										copyright, data privacy,		Counsel					
										and safety issues							
162	Mate Keden 00004	Mate Veden 00004							5/6/2023 20:10	Down at acciding land	Attorney Oll- et	MPI In-House Legal			Privileged - Withhold	EMAII	Attachment
102	Meta_Kadrey_00094 879	877							5/0/2023 20:10	Document providing legal advice concerning safety	Attorney Client	Counsel			Priviteged - Withhold	EMML	Attachment
										issues							
168	Meta_Kadrey_00209 351	Meta_Kadrey_00209 344							3/11/2023 0:07	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
	351	344								advice concerning contract issues		Counsel					
169	Meta_Kadrey_00209	Meta_Kadrey_00209							1/28/2023 1:12	Email Chain reflecting	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	StandAlone
	461	461								legal advice concerning		Counsel					Document
										product development							
170	Meta_Kadrey_00209	Meta_Kadrey_00209							10/18/2022 15:34	Chat reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	WP Chats	Parent
		464								advice concerning		Counsel			_		
										copyright issues							
172	Meta_Kadrey_00209	Meta_Kadrey_00209							7/20/2023 4;22	Chat reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	WP Chats	StandAlone
		473								advice concerning		Counsel			_		Document
										copyright issues							
179	Meta_Kadrey_00203	Meta Kadrey 00203							7/10/2023 19:47	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	759	750								advice concerning		Counsel					
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Highly Confidential Attorneys' Eyes Only

Kadrey v Meta Platforms, Inc Case No 3 23-cv-03417-VC

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	CC	BCC	WhatsApp Chat	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/	Data Type	Family Relationsh
								Participants							Not Privileged		
180		Meta_Kadrey_00203							7/10/2023 19:47	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	763	750								advice concerning		Counsel					
										regulatory and contract issues							
184	M-to Vode-u 00000	Meta_Kadrey_00203							4/47/20242:40	Email Chain reflecting	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAII	StandAlone
104	781	781							1/1/2024-3:40	legal advice concerning	Attorney Coent	Counsel			Privileged - nedact	EMAIL	Document
	701	702								copyright issues		Counses					Document
188	Meta Kadrey 00093	Meta_Kadrey_00093							5/7/2023 19:32	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
		522								advice concerning open	,	Counsel					
										source policy							
191									9/22/2023 15:41	Email seeking legal advice	Attorney Client				Privileged - Withhold	EMAIL	StandAlone
										concerning product							Document
										release							
196		Meta_Kadrey_00203 827							7/8/2023 7:10	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	835	627								advice concerning communications with		Counsel					
										third parties							
197	Meta Kadrey 00203	Meta_Kadrey_00203							7/8/2023 7:10	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	839	827								advice concerning	'	Counsel			_		
										regulatory and contract							
										issues							
203	Meta_Kadrey_00203 865	Meta_Kadrey_00203 857							7/8/2023 7:00	Document reflecting legal	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
	860	657								advice concerning contract issues		Counsel					
										Contract issues							
204	Meta Kadrey 00203	Meta_Kadrey_00203							7/8/2023 7:00	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	869	857								advice concerning		Counsel					
										regulatory and contract							
										issues							
		Meta_Kadrey_00094							7/11/2023 23:13	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
	624	819								advice concerning contract issues		Counsel					
										Contract issues							
210		Meta_Kadrey_00203							7/13/2023 17:01	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	StandAlone
	909	909								advice concerning contract issues		Counsel					Document
										contract issues							
							I										
							I										
							I										
		Meta_Kadrey_00203							5/31/20236;53	Document reflecting legal					Privileged - Withhold	EMAIL	Attachment
	009	983					I			advice concerning data	Product	Counsel					
							I			privacy and safety issues							
218	Meta_Kadrey_00204 010	Meta_Kadrey_00203 983					I		5/31/2023 6:53	Document reflecting legal advice concerning	Attorney Client; Work Product	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
	010	363								copyright, data privacy,	Product	Couriset					
										and safety issues							
										and surely resuces							

Priv Log No	. Bates No.	BegAttach	Custodians	Author/From	То	cc	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationship
220									6/26/2023 4:20	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
223										Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
227	Meta_Kadrey_00204 032	Meta_Kadrey_00204 032							1/17/2024 15:02	Email Chain reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact		StandAlone Document
230	Meta_Kadrey_00204 043	Meta_Kadrey_00204 041								Document reflecting legal advice concerning safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
232	Meta_Kadrey_00204 045	Meta_Kadrey_00204 044							3/18/2024 22:31	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
234									4/1/2024 23:37	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
244	Meta_Kadrey_00204 095	Meta_Kadrey_00204 095								Chat reflecting legal advice concerning open source policy and contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Parent
249										Email reflecting legal advice concerning this litigation	Attorney Client;Work Product	MPI In-House Legal Counsel			Privileged - Withhold		StandAlone Document
252									10/25/2023 14:02	Email reflecting legal advice concerning this litigation	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
257									6/22/2023 13:32	Email reflecting legal advice concerning data privacy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold		StandAlone Document
260	Meta_Kadrey_00211 241	Meta_Kadrey_00211 241								Email reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact		StandAlone Document
261										Email seeking legal advice concerning product development and open source issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold		StandAlone Document
265										Email seeking legal advice concerning product development and contract issues	'	MPI In-House Legal Counsel			Privileged - Withhold		StandAlone Document

Priv Log No	. Bates No.	BegAttach	Custodians	Author/From	То	cc	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationship
266									1/23/2023 15:46	Email seeking legal advice concerning product development and open source issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
267									1/23/2023 15:46	Email seeking legal advice concerning product development and open source issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
274	Meta_Kadrey_00211 245	Meta_Kadrey_00211 245							4/14/2023 1:34	Chat reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	StandAlone Document
275	Meta_Kadrey_00211 247	Meta_Kadrey_00211 247							7/10/2023 16:27	Email Chain reflecting legal advice concerning this litigation	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Parent
276	Meta_Kadrey_00211 249	Meta_Kadrey_00211 247							7/10/2023 16:27	Image reflecting legal advice concerning data privacy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
277									4/18/2023 19:32	Chat reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold		StandAlone Document
282										Chat seeking legal advice concerning copyright issues		MPI In-House Legal Counsel			Privileged - Withhold		Attachment
283										Chat seeking legal advice concerning copyright issues		MPI In-House Legal Counsel			Privileged - Withhold		Attachment
284	Meta_Kadrey_00211 257	Meta_Kadrey_00211 257								Chat reflecting legal advice concerning copyright and data privacy issues		MPI In-House Legal Counsel				WP Chats	Parent
287									7/5/2023 21:55	Image providing information for the purpose of facilitating legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
306	Meta_Kadrey_00096 360	Meta_Kadrey_00095 999							5/28/2024 4:51	Document reflecting legal advice concerning copyright, privacy, and regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
309	Meta_Kadrey_00096 377	Meta_Kadrey_00096 374							5/27/2024 20:22	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
312	429	Meta_Kadrey_00096 378								Document reflecting legal advice concerning open source policy		MPI In-House Legal Counsel			Privileged - Withhold		Attachment
326	Meta_Kadrey_00096 536	Meta_Kadrey_00096 533							5/6/2024 19:24	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment

Priv Log No.		BegAttach	Custodians	Author/From	То	cc	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationshi
327	Meta_Kadrey_00096 550	Meta_Kadrey_00096 550							4/23/2024 21:36	Email Chain seeking and reflecting legal advice concerning advertising	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	StandAlone Document
329	Meta_Kadrey_00096 596	Meta_Kadrey_00096 595							4/14/2024 23:55	Email Chain seeking and reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	StandAlone Document
	Meta_Kadrey_00096 643	Meta_Kadrey_00096 640							3/29/2024 19:04	Document reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
337	Meta_Kadrey_00096	Muta Kadray 0005							3/20/2024 10-04	regulatory and safety issues Document providing legal	Attorney Client	MPI In-House Legal			Privileged - Withhold	FMAII	Attachment
337	644	640							W232024 13.04	advice concerning data privacy and safety issues	Patoricy Coeffic	Counsel					Augustinent
339	Meta_Kadrey_00096 657	Meta_Kadrey_00096 655							3/22/2024 0:00	Document reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
341	Meta_Kadrey_00096 705	Meta_Kadrey_00096 701							3/21/2024 17:45	Document seeking and reflecting legal advice concerning data privacy and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
	Meta_Kadrey_00096 739	Meta_Kadrey_00096 739							3/18/2024 20:20	Email seeking legal advice concerning data privacy and safety issues	Attorney Client				Privileged - Redact	EMAIL	Parent
343	Meta_Kadrey_00096 741	Meta_Kadrey_00096 739							3/18/2024 20:20	Document providing legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
344	Meta_Kadrey_00096 742	Meta_Kadrey_00096 739							3/18/2024 20:20	Document providing legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationship
347	Meta_Kadrey_00096 759	Meta_Kadrey_00096 757							3/20/2024 19:08	Document reflecting legal advice concerning regulatory and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
349	Meta_Kadrey_00096	Meta_Kadrey_00096							3/12/2024 21:18	Document providing legal	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
	817	814								advice concerning copyright, data privacy, and safety issues		Counsel					
357	Meta_Kadrey_00096 898	Meta_Kadrey_00096 883							2/24/2024 10:30	Document reflecting legal advice concerning regulatory and contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
362	Meta_Kadrey_00097 221	Meta_Kadrey_00096 941							2/7/2024 2;38	Document reflecting legal advice concerning regulatory and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
368	Meta_Kadrey_00097 236	Meta_Kadrey_00097 233							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
371	Meta_Kadrey_00097 255	Meta_Kadrey_00097 251							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
374	Meta_Kadrey_00097 273	Meta_Kadrey_00097 270							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
377	Meta_Kadrey_00097 291	Meta_Kadrey_00097 288							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
380	Meta_Kadrey_00097 310	Meta_Kadrey_00097 306							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
383	Meta_Kadrey_00097 328	Meta_Kadrey_00097 325							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
386	Meta_Kadrey_00097 346	Meta_Kadrey_00097 343							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
389	Meta_Kadrey_00097 364	Meta_Kadrey_00097 361							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
392	Meta_Kadrey_00097 382	Meta_Kadrey_00097 379							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
397	Meta_Kadrey_00231 372	366								Document reflecting legal advice concerning open source policy		MPI In-House Legal Counsel			Privileged - Redact		Attachment
405	Meta_Kadrey_00097 435	Meta_Kadrey_00097 432								Document reflecting legal advice concerning contract issues		MPI In-House Legal Counsel			Privileged - Redact		Attachment
412										Document providing legal advice concerning open source policy Document providing legal		MPI In-House Legal Counsel MPI In-House Legal			Privileged - Withhold Privileged - Withhold		Attachment
413									7/10/2024 10:54	advice concerning open source policy	Adorney Guent	Counsel			r-iviteged - withhold	LIPAL	Adaciment

Belod a chie	Bates No.	BeşAttach	Custodians	Author/From	То	CC	BCC	WhatsApp Chat	Date	Beloft - B - eletter	D	110	Email Subject	Filename	Withhold/Redact/	Data Type	Family Relationship
Priv Log No.	. Dates No.	DegAttach	Custodians	Author/From	10	CC	ВСС	Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	ritename	Not Privileged	Data Type	ramity Ketationship
415	Meta_Kadrey_00097								7/9/2024 22:46	Document seeking and	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
	518	515								containing legal advice		Counsel					
										concerning open source							
	M to Made a page 7	M 4- K-4 00007							710100044-04	policy		MOUTE HOUSE I and			24.01 . d 1484414	F14411	
417	Meta_Kadrey_00097 526	Meta_Kadrey_00097 523							7/9/2024 1:04	Document seeking and containing legal advice	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
	520	523								concerning open source		Counset					
										policy							
										,							
418	Meta_Kadrey_00231								7/9/2024 0:11	Email Chain providing	Attorney Client				Privileged - Redact	EMAIL	StandAlone
	379	379								legal advice concerning							Document
										regulatory and data privacy issues							
										privacy issues							
427	Meta_Kadrey_00097	Meta Kadrey 00097							7/8/2024 21:42	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	549	535								advice concerning		Counsel					
										contract issues							
434	Meta_Kadrey_00097	Meta_Kadrey_00097							7/8/2024 21:42	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	561	535								advice concerning		Counsel					
										product development							
438	Meta_Kadrey_00097								7/8/2024 21:42	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	568	535								advice concerning		Counsel					
										regulatory issues and potential							
										merger/acquisition deals							
441	Meta_Kadrey_00097	Mate Vedray 00007							7/1/2024 20:27	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAII	Attachment
441	Meta_Kadrey_00097	596							// 11 ZUZ4 ZU:2/	advice concerning open	Autorney Cuent	Counsel			- iivitegeu - neuact	LITERAL	Auachment
										source policy							
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v Log No.	Bates No.	BegAttach	Custodians	Author/From	То	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relations
442	Meta_Kadrey_00231 383	Meta_Kadrey_00231 383							7/5/2024 21:35						Not Privileged	EMAIL	Parent
	Meta_Kadrey_00231								7/5/2024 21:35	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	392	383								advice concerning regulatory issues		Counsel					
150									75 1000 101 05								
	Meta_Kadrey_00231 397	Meta_Kadrey_00231 383							//5/2024 21:35	Document reflecting legal advice concerning open	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
										source policy							
54	Meta_Kadrey_00231	Meta_Kadrey_00231							7/5/2024 21:35	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	406	383								advice concerning open source policy		Counsel					
										source pointy							
	Meta_Kadrey_00231 411	Meta_Kadrey_00231 383							7/5/2024 21:35	Document reflecting legal advice concerning open	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
		000								source policy		Counse					
63	Meta_Kadrey_00097	Meta Kadrey 00097							6/27/2024 20:23	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	FMAII	Attachment
		688								advice concerning open	, cann	Counsel			Trineges Treasure		
										source policy							
	Meta_Kadrey_00097								6/28/2024 0:26		Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
	697	694								reflecting legal advice concerning open source		Counsel					
										policy							
67	Meta_Kadrey_00097	Meta_Kadrey_00097							6/28/2024 3:29	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	700	698								advice concerning open source policy		Counsel					
9	Meta_Kadrey_00097	Meta_Kadrey_00097							6/27/2024 2:03	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	718	717								advice concerning open source policy		Counsel					
		Meta_Kadrey_00097							6/26/2024 20:34	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	723	722								advice concerning open source policy		Counsel					
	Meta_Kadrey_00231 422	Meta_Kadrey_00231 418							8/8/2024 20:00	Presentation reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
										product development							
77	Meta_Kadrey_00231	Meta Kadrev 00231							8/8/2024 20:00	Presentation reflecting	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	441	437								legal advice concerning	, Jan.	Counsel			- Industry		
- 1							I	1		product development	I	1				I	1

v Log No.	Bates No.	BegAttach	Custodians	Author/From	То	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relations
480	Meta_Kadrey_00097 741	Meta_Kadrey_00097 738							8/8/2024 20:00	Presentation reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
	/41	7.50								product development		Courses					
483	Meta_Kadrey_00097								6/28/2024 21:45	Document seeking and	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
	760	757								reflecting legal advice concerning open source		Counsel					
										policy							
485	Meta_Kadrey_00097 763	Meta_Kadrey_00097							6/28/2024 18:24	Document reflecting legal advice concerning open	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
		702								source policy		Courise					
490	Meta_Kadrey_00097 785	Meta_Kadrey_00097 782							6/20/2024 18:46	Document reflecting legal	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
	765	762								advice concerning contract issues		Courses					
***	M +- K-d 00007	M 4- K-4 00007							CIDDIDOO LAD. AC	De con etc. Me cond	Am	MOUSE House I and			mad a separate	F344.0	
191	Meta_Kadrey_00097 792	782							6/2U/2U24 18:46	Document seeking and reflecting legal advice	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
										concerning regulatory and							
										safety issues							
	Meta_Kadrey_00097 886	Meta_Kadrey_00097 8R3							6/7/2024 20:04	Document providing legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
										regulatory and safety							
										issues							
197	Meta Kadrey 00097	Meta_Kadrey_00097							6/7/2024 20:04	Document seeking and	Attorney Client	MPI In-House Legal			Privileged - Withhold	FMAIL.	Attachment
		883								reflecting legal advice	,	Counsel					
										concerning open source policy							
	Meta_Kadrey_00097	Meta_Kadrey_00097							6/12/2024 19:45	Document seeking and	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	896	895								reflecting legal advice concerning copyright and		Counsel					
										regulatory issues							
80	Meta_Kadrey_00097 988	Meta_Kadrey_00097							7/20/2024 20:46	Document reflecting legal	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
	900	900								advice concerning safety issues		Couriset					
509	Meta_Kadrey_00097	Meta_Kadrey_00097							7/20/2024 20:46	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
	989	986								advice concerning safety issues		Counsel					
										issues							
									700000010015								
	Meta_Kadrey_00097 990	Meta_Kadrey_00097 986							7/20/2024 20:46	Document reflecting legal advice concerning safety	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
										issues							
	Meta_Kadrey_00098								7/11/2023 17:54	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	720	717								advice concerning copyright, data privacy,		Counsel					
										and safety issues							
	Meta_Kadrey_00098	Meta_Kadrey_00098 734							7/6/2023 17:17	Email reflecting legal advice concerning open	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Parent
										source policy							
527	Meta_Kadrey_00098								7/6/2023 17:17	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
	737	734								advice concerning copyright, data privacy,		Counsel					
										and safety issues							
29	Meta_Kadrey_00098 741	Meta_Kadrey_00098 738							6/30/2023 18:10	Document reflecting legal	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
	/41	/30								advice concerning copyright, data privacy,		Couriset					
	I						I	1	1	and safety issues	I	1					1

riv Log No.	. Bates No.	BegAttach	Custodians	Author/From	То	cc	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relations
530	Meta_Kadrey_00098 813	Meta_Kadrey_00098 813							6/29/2023 16:53	Email Chain seeking and reflecting legal advice concerning open source	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Parent
531	Meta_Kadrey_00098 817	Meta_Kadrey_00098 813							6/29/2023 16:53	policy Document providing legal advice concerning	Attorney Client; Work	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
										copyright and safety issues							
533	Meta_Kadrey_00098 829	Meta_Kadrey_00098 829							6/16/2023 19:16	Email Chain seeking and reflecting legal advice concerning data privacy and safety issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Parent
534	Meta_Kadrey_00098 832	Meta_Kadrey_00098 829							6/16/2023 19:16	Document reflecting legal advice concerning copyright and safety issues	Attorney Client;Work Product	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
540	Meta_Kadrey_00098 888	Meta_Kadrey_00098 833							11/13/2023 18:33	Document reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
543	Meta_Kadrey_00098 912	Meta_Kadrey_00098 833							11/13/2023 18:33	Document reflecting legal advice concerning regulatory and data privacy issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
552		Meta_Kadrey_00098 833							11/13/2023 18:33	Document reflecting legal advice concerning copyright, privacy, and regulatory issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
	Meta_Kadrey_00099 017	Meta_Kadrey_00098 833							11/13/2023 18:33						ot Privileged	EMAIL	Attachment
558		Meta_Kadrey_00099 162							6/8/2023 18:56	Email reflecting legal advice concerning data privacy and safety issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Parent
559		Meta_Kadrey_00099 162							6/8/2023 18:56	Document reflecting legal advice concerning regulatory and data privacy issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
561		Meta_Kadrey_00099 175							6/12/2023 3:10	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
562		Meta_Kadrey_00099 175							6/12/2023 3:10	Document reflecting legal advice concerning regulatory issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
572		Meta_Kadrey_00099 175							6/12/2023 3:10	Document reflecting legal advice concerning data privacy	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
576		Meta_Kadrey_00099 175							6/12/2023 3:10	Document reflecting legal advice concerning other litigation, product development, product release, regulatory, safety and privacy issues		MPI In-House Legal Counsel			rivileged - Withhold		Attachment
584									5/31/2023 19:24	Document providing legal advice concerning open source policy	Attorney Client	External Legal Counsel			rivileged - Withhold	EMAIL	Attachment
588	Meta_Kadrey_00099 419	Meta_Kadrey_00099 415							5/31/2023 4:35	Presentation reflecting legal advice concerning data privacy	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
592	Meta_Kadrey_00099 460	Meta_Kadrey_00099 415							5/31/2023 4:35	Document seeking and reflecting legal advice concerning communications with the board of directors	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment

Priv Log No.	. Bates No.	BegAttach	Custodians	Author/From	То	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationship
593		Meta_Kadrey_00099						- articipants	5/31/20234:35	Document reflecting legal	Attorney Client	External Legal			Privileged - Redact	EMAIL	Attachment
	618	415								advice concerning		Counsel;MPI In-					
										communications with the board of directors		House Legal Counsel					
596		Meta_Kadrey_00099							6/2/2023 17:25		Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	827	826								advice concerning data privacy and safety issues		Counsel					
										privacy and sarety issues							
598	Meta Kadrey 00099	Meta_Kadrey_00099							6/2/2023 17:25	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	FMAIL	Attachment
0.50	834	826							022202027220	advice concerning		Counsel			Titaleged Heddet		, and control of
										copyright and data privacy	1						
601	Meta Kadrey 00099	Meta_Kadrey_00099							5/26/2023 1:36	Issues Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	FMAIL.	Attachment
001	841	840							W2W2D2D 2.00	advice concerning	rational documents	Counsel			Tivileged Tieddet		, and control of
										copyright, data privacy,							
603	Meta Kadrey 00099	Meta_Kadrey_00099							5/19/2023 15:48	and safety issues Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	FMAII	Attachment
-	852	851								advice concerning	, and the same	Counsel			Timegra Tiesaut		
										copyright, privacy, and regulatory issues							
608	Meta Kadrey 00100	Meta_Kadrey_00100							1/30/2024 20:34	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
	081	080								advice concerning	,	Counsel					
										communications with government entities							
609	Meta Kadrey 00100	Meta Kadrey 00100							1/30/2024 20:34	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
	082	080								advice concerning	,	Counsel					
										communications with government entities							
										government endues							
615	Meta_Kadrey_00100	Meta_Kadrey_00100							1/19/2024 2:47	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	150	149								advice concerning regulatory issues		Counsel					
642	Meta_Kadrey_00218	Meta_Kadrey_00218							6/9/2023 17:26	Document providing legal	Attorney Client	External Legal			Privileged - Withhold	EMAIL	Attachment
	594	593								advice concerning		Counsel					
										contract issues							
655		<u> </u>							10/4/2022 0:02	Email seeking and	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Parent
										reflecting legal advice		Counsel					
										concerning copyright issues							
656									10/4/2022 0:02		Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
										reflecting legal advice concerning copyright		Counsel					
										issues							
658	Meta_Kadrey_00218 743	Meta_Kadrey_00218 742							10/19/2022 18:32	Document seeking legal advice concerning	Attorney Client				Privileged - Withhold	EMAIL	Attachment
		-								contract issues							
		1														I	

riv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	СС	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relations
660	Meta_Kadrey_00218 750								10/19/2022 18:32	Document seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
671	Meta_Kadrey_00218 893								12/6/2022 17:22	Chat reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	StandAlone Document
674	Meta_Kadrey_00218 900								12/1/2022 19:08	Chat reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Attachment
675	Meta_Kadrey_00218 901								12/1/2022 19:08	Chat reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Attachment
679	Meta_Kadrey_00218 906								12/1/2022 21:49	Chat reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Attachment
	Meta_Kadrey_00218 911								12/1/2022 19:37	Chat reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Attachment
	Meta_Kadrey_00218 913								3/28/2023 17:28	Chat reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	StandAlone Document
	Meta_Kadrey_00218 924								12/1/2022 20:52	Chat reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Attachment
933									7/18/2023 2:26	Document seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attached Parent
934									7/18/2023 2:26	Document seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
935									7/18/2023 2:26	Document seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
1021									2/22/2023 22:26	Document providing information for the purpose of facilitating legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
1065									7/7/2023 22:29	contract issues Chat requesting information for the purpose of facilitating legal advice and containing legal advice concerning contract issues	Attorney Client				Privileged - Withhold	WP Chats	StandAlone Document
1302									9/7/2023 20:14	Document reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
1303									8/11/2023 22:42	Document reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document

		BegAttach	Custodians	Author/From	То	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationshi
1304									8/11/2023 23:01	Document reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
1307									3/14/2024 0:31	Email reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
1330									11/29/2023 2:32	Email reflecting legal advice concerning data privacy and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
1373	Meta_Kadrey_00211 852	Meta_Kadrey_00211 852							1/5/2024 15:16	Chat reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	StandAlone Document
1375									1/4/2024 18:16	Chat requesting information for the purpose of facilitating legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	StandAlone Document
1386									9/26/2023 23:05	Document reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
1388									7/3/2023 18:31	Chat requesting information for the purpose of facilitating legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	StandAlone Document
1390	Meta_Kadrey_00207 937	Meta_Kadrey_00207 936							8/28/2023 15:36	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
1462									7/20/2023 14:17	Email seeking and containing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
1464									7/20/2023 19:30	Email seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
1466										Email seeking legal advice concerning contract issues		MPI In-House Legal Counsel			Privileged - Withhold		StandAlone Document
1473									5/10/2023 17:47	Email reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document

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Kadrey v Meta Platforms, Inc Case No 3 23-cv-03417-VC

Priv Log No.	. Bates No.	BegAttach	Custodians	Author/From	То	СС	всс	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationship
1497										Chat seeking and reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	WP Chats	StandAlone Document
1525										Document seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	WP Chats	Attachment
1539	Meta_Kadrey_00208 534	Meta_Kadrey_00208 533								Document seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	WP Chats	Attachment
1545										Email providing information for the purpose of facilitating legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	StandAlone Document
1564										Chat reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	WP Chats	StandAlone Document

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Attorneys' Eyes Only

Kadrey v. Meta Platforms, Inc. Case No. 3:23-cv-03417-VC

Priv Log	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
No. 11				4/15/2024	Document reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
37		Meta Platforms, Inc			Spreadsheet seeking and reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
38		Meta Platforms, Inc			Spreadsheet seeking and reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
43				5/3/2024	Document reflecting legal advice concerning data privacy	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
47	Meta_Kadrey_00146 455	Meta Platforms, Inc		10/31/2024	Document providing legal advice concerning product release	Attorney Client;Work Product	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
68				4/24/2024	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
75		Meta Platforms, Inc		11/20/2024	Document providing legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
No.				5/22/2024	Document providing legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
81				6/4/2024	Document providing legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
82		Meta Platforms, Inc		9/11/2023	Document seeking and reflecting legal advice concerning open source and safety issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
106	Meta_Kadrey_00209 782			1/24/2023	Document seeking and containing legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Redact	GSUITE
121				4/9/2024	Document reflecting legal advice concerning product development, copyright, and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
122				4/9/2024	Document providing legal advice concerning product development, copyright, and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
No. 132		Meta Platforms, Inc		11/20/2024	Document providing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
142		Meta Platforms, Inc		11/20/2024	Document seeking legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
146				6/5/2024	Spreadsheet seeking and containing legal advice concerning product development, copyright, and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
147				6/5/2024	Spreadsheet seeking and containing legal advice concerning product development, copyright, and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
156		Meta Platforms,	Author	2/23/2023		Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
160				2/25/2024	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
169				9/16/2023	Document reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
No. 170		Meta Platforms, Inc		9/7/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
171		Meta Platforms, Inc		9/7/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
172		Meta Platforms, Inc		9/7/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
173		Meta Platforms, Inc		9/1/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
174		Meta Platforms, Inc		9/12/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
175		Meta Platforms, Inc		9/7/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
No. 176		Meta Platforms, Inc		9/1/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
177		Meta Platforms, Inc		9/18/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
178		Meta Platforms, Inc		9/12/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
180				9/6/2023	Document seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
181				9/6/2023	Document seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
182				9/6/2023	Document seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
	Meta_Kadrey_00207 881			2/27/2024	Document reflecting legal advice concerning product development and contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
No.										
197		Meta Platforms, Inc		2/13/2023	Document providing legal advice concerning contract issues		MPI In-House Legal Counsel		Privileged - Withhold	One Drive
198		Meta Platforms,	Author	3/16/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
199		Meta Platforms,	Author	3/15/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
205		Meta Platforms,	Author	3/16/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
207		Meta Platforms,	Author	3/22/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
209		Meta Platforms, Inc		10/24/2024	Document providing legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	Loose Docs
210				11/22/2022	Document providing legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
214				10/9/2023	Document providing legal advice concerning data privacy	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
216				10/26/2023	Document seeking and reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE

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Kadrey v. Meta Platforms, Inc. Case No. 3:23-cv-03417-VC

Priv Log	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
No. 217				10/26/2023	Document seeking and reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
220				11/6/2023	Document seeking and reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
	Meta_Kadrey_00207 915			1/10/2023	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
	Meta_Kadrey_00207 919			11/30/2022	Document reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
244				12/5/2023	Document providing legal advice concerning communications with the board of directors	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
265				9/20/2023	Document reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
266		;Meta Platforms,	Author	2/16/2023	Document providing legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
267		Meta Platforms,	Author	2/16/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename Withhold/Reda	ct Data Type
No. 268		;Meta Platforms,	Author	2/9/2023	Document providing legal advice concerning contract issues		MPI In-House Legal Counsel	Privileged - Withhold	OneDrive
269		Meta Platforms,	Author	2/28/2023	Document providing legal advice concerning contract issues		MPI In-House Legal Counsel	Privileged - Withhold	OneDrive
281				4/23/2024	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel	Privileged - Withhold	GSUITE
282				7/24/2024	Document reflecting legal advice concerning copyright, data privacy, and safety issues	l .	MPI In-House Legal Counsel	Privileged - Withhold	GSUITE
301	Meta_Kadrey_00207 901			2/23/2023	Document seeking and reflecting legal advice concerning copyright and contract issues	Attorney Client	MPI In-House Legal Counsel	Privileged - Withhold	OneDrive
306		Meta Platforms, Inc		10/31/2024	Document reflecting legal advice concerning copyright, data privacy, and safety issues		MPI In-House Legal Counsel	Privileged - Withhold	GSUITE
307		Meta Platforms, Inc		10/31/2024	Document seeking and reflecting legal advice concerning copyright, data privacy, and safety issues		MPI In-House Legal Counsel	Privileged - Withhold	GSUITE

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Kadrey v. Meta Platforms, Inc. Case No. 3:23-cv-03417-VC

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
No.										
333				2/17/2022	Document providing	Attorney Client	MPI In-House Legal		Privileged -	GSUITE
					information for the		Counsel		Withhold	
			Γ		purpose of facilitating					
					legal advice concerning					
					regulatory issues					

Fourth Privilege Log - December 16, 2024

Priv Log No.	Bates No.	Beg Attach	Custodians	Author/From	То	cc	BCC	Legal Source	Date	Privilege Description	Privilege Type
1	Meta_Kadrey_0020420 7	Meta_Kadrey_00204207						MPI In-House Legal Counsel	2/16/2024	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client
2	Meta_Kadrey_0023203 4	Meta_Kadrey_00232034						MPI In-House Legal Counsel	2/16/2024	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client
3	Meta_Kadrey_0014651 6	Meta_Kadrey_00146516						MPI In-House Legal Counsel	5/30/2023	Chat reflecting legal advice concerning open source policy	Attorney Client
4	Meta_Kadrey_0014652 9	Meta_Kadrey_00146529						MPI In-House Legal Counsel	7/15/2023	Chat seeking legal advice concerning open source policy	Attorney Client
6	Meta_Kadrey_0021857 8	Meta_Kadrey_00218578						MPI In-House Legal Counsel	2/16/2024	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client
7	Meta_Kadrey_0008129 0	Meta_Kadrey_00081290						MPI In-House Legal Counsel	1/31/2023	Document reflecting legal advice concerning open source policy	Attorney Client
	Meta_Kadrey_0008801 9	Meta_Kadrey_00088019						MPI In-House Legal Counsel	5/23/2024	Document seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client
9	Meta_Kadrey_0007852 0	Meta_Kadrey_00078520						MPI In-House Legal Counsel	5/15/2024	Document seeking legal advice concerning open source policy	Attorney Client
10	Meta_Kadrey_0020338 4	Meta_Kadrey_00203384						MPI In-House Legal Counsel	4/29/2024	Spreadsheet reflecting legal advice concerning copyright issues	Attorney Client
	Meta_Kadrey_0015487 6	Meta_Kadrey_00154876						MPI In-House Legal Counsel	2/15/2024	Document seeking legal advice concerning data privacy	Attorney Client
12	Meta_Kadrey_0007877 2	Meta_Kadrey_00078772						MPI In-House Legal Counsel	10/5/2023	Document reflecting legal advice concerning copyright issues	Attorney Client
13	Meta_Kadrey_0020374 8	Meta_Kadrey_00203748						MPI In-House Legal Counsel	8/18/2023	Document reflecting legal advice concerning contract issues	Attorney Client
14	Meta_Kadrey_0007574 2	Meta_Kadrey_00075742						MPI In-House Legal Counsel	2/29/2024	Document seeking legal advice concerning data privacy	Attorney Client
	Meta_Kadrey_0007585 3	Meta_Kadrey_00075853						MPI In-House Legal Counsel	12/28/2023	Document reflecting legal advice concerning data privacy	Attorney Client
	Meta_Kadrey_0007894 9	Meta_Kadrey_00078949						MPI In-House Legal Counsel	7/19/2023	Document reflecting legal advice concerning open source policy	Attorney Client

Email Subject	Filename	Withhold/Redact/	Data Type	Family
		Not Privileged		Relationship
		Privileged - Redact		Standalone
		Privileged - Redact	WhatsApp	Standalone
		Privileged - Redact		Standalone
		Privileged - Redact		Standalone
		Privileged - Redact	WhatsApp	Standalone
		Privileged - Redact	GSUITE	Parent
		Privileged - Redact		Parent
		Privileged - Redact	GSUITE	Parent
		Privileged - Redact		StandAlone Document
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		Privileged - Redact		Parent
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		Privileged - Redact		StandAlone Document
		Privileged - Redact	GSUITE	Parent

Fourth Privilege Log - December 16, 2024

25 Meta, Kadery, 9007841 Meta, Kadery, 900791135 Meta, Kadery, 900791135 Meta, Kadery, 90079127 Meta, Kadery, 90079177 Meta, Kadery, 90079177 Meta, Kadery, 90079177 Meta, Kadery, 90079177 Meta, Kadery, 90091910 Meta, Kadery,	Priv Log No.	Bates No.	Beg Attach	Custodians	Author/From	То	cc	BCC	Legal Source	Date	Privilege Description	Privilege Type
29 Meta Kadrey 0000412 Meta Kadrey 00004135 B B B B B B B B B	22	Meta_Kadrey_0007908	Meta_Kadrey_00079085						MPI In-House	4/14/2024	Email reflecting legal	Attorney Client
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9 Legal Counsel advice concerning regulatory and data privacy											issues	
regulatory and data privacy	37	Meta_Kadrey_0005261	Meta_Kadrey_00052619							2/6/2024		Attorney Client
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Fourth Privilege Log - December 16, 2024

Priv Log No.	Bates No.	Beg Attach	Custodians	Author/From	То	cc	BCC	Legal Source	Date	Privilege Description	Privilege Type
38	Meta_Kadrey_0009674 4	Meta_Kadrey_00096743						MPI In-House Legal Counsel	3/8/2024	Document seeking and reflecting legal advice concerning data privacy	Attorney Client
39	5	Meta_Kadrey_00096844						MPI In-House Legal Counsel	3/7/2024	Document seeking and reflecting legal advice concerning data privacy	Attorney Client
40	Meta_Kadrey_0009745 7	Meta_Kadrey_00097446						MPI In-House Legal Counsel	7/10/2024	Document reflecting legal advice concerning regulatory issues and potential merger/acquisition deals	Attorney Client
42	Meta_Kadrey_0009825 6	Meta_Kadrey_00098256						MPI In-House Legal Counsel	7/18/2024	Email reflecting legal advice concerning communications with third parties	Attorney Client
43	Meta_Kadrey_0009988 8	Meta_Kadrey_00099886						MPI In-House Legal Counsel	6/7/2023	Email seeking and reflecting legal advice concerning data privacy and safety issues	Attorney Client
44	Meta_Kadrey_0009989 6	Meta_Kadrey_00099895						MPI In-House Legal Counsel	6/7/2023	Email seeking and reflecting legal advice concerning data privacy and safety issues	Attorney Client
45	Meta_Kadrey_0010090 0	Meta_Kadrey_00100839						MPI In-House Legal Counsel	9/11/2023	Document reflecting legal advice concerning regulatory issues	Attorney Client
56	Meta_Kadrey_0009395 4	Meta_Kadrey_00093954						MPI In-House Legal Counsel	2/24/2023	Chat reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client
5	Meta_Kadrey_0014653 3	Meta_Kadrey_00146533						MPI In-House Legal Counsel	7/24/2023	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client
24	Meta_Kadrey_0020411 7	Meta_Kadrey_00204115						MPI In-House Legal Counsel	5/22/2023	Image reflecting legal advice concerning open	Attorney Client
54	Meta_Kadrey_0021105 3	Meta_Kadrey_00211053							7/14/2023	source policy Email Chain seeking and reflecting legal advice concerning contract issues	Attorney Client

Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationship
		rivileged - Redact	EMAIL	Attachment
		rivileged - Redact	EMAIL	Attachment
		rivileged - Redact	EMAIL	Attachment
		rivileged - Redact	EMAIL	Parent
		rivileged - Redact	EMAIL	Attached Parent
		rivileged - Redact	EMAIL	Attached Parent
		rivileged - Redact	WPChats	Attachment
		rivileged - Redact		Standalone
		Mthhold		Standalone
		rivileged - Withhold	WP Chats	Attachment
		rivileged - Vithhold	WP Chats	Parent

Case 3:23-cv-03417-VC Document 353-2 Filed 12/20/24 Page 1 of 31

EXHIBIT B

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	cc	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationship
8									9/28/2023 21:33	Email providing legal advice concerning copyright and open source issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
24			_						10/24/2022 2:51	Email Chain seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
30	Meta_Kadrey_00218 164	Meta_Kadrey_00218 157	3						2/23/2023 21:22	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
31			_						2/28/2024 22:33	Chat reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	StandAlone Document
34	Meta_Kadrey_00218 170	Meta_Kadrey_00218 170	3						10/19/2022 16:09	Chat reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	StandAlone Document
35									2/27/2024 21:34	Email providing legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	StandAlone Document
36			_						12/7/2022 22:02	Chat reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	StandAlone Document
37	Meta_Kadrey_00218 177	Meta_Kadrey_00218 177	3						2/23/2024 4:45	Chat seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Parent
38	Meta_Kadrey_00218 178	Meta_Kadrey_00218 177	3						2/23/2024 4:45	Document seeking legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Attachment
39	Meta_Kadrey_00218 183	Meta_Kadrey_00218 183	3						1/3/2024 23:50	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	StandAlone Document
42	Meta_Kadrey_00209 872	Meta_Kadrey_00209 871							1/16/2024 21:37	Document reflecting legal advice concerning copyright, privacy, and regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment

iv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	CC	BCC	WhatsApp	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/	Data Type	Family Relationsh
								Chat Participants							Not Privileged		
	Meta_Kadrey_00209								7/6/2023 14:12		Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
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										and safety issues							
	Meta_Kadrey_00094 881	Meta_Kadrey_00094 880							1/15/2024 5:14	Document reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
ľ	001	000								copyright, privacy, and		Course					
										regulatory issues							
	Meta_Kadrey_00209								7/6/2023 12:06	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
	929	927								advice concerning copyright, data privacy,		Counsel					
										and safety issues							
68									10/11/2023 14:03	Email reflecting legal	Attorney Client; Work	MPI In-House Legal			Privileged - Withhold	FMAII	StandAlone
~									201222024.00	advice concerning this	Product	Counsel			Tivileged Wilamoto	L. Fac	Document
										litigation							
73									9/18/2023 14:21	Email seeking legal advice	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	StandAlone
										concerning copyright issues		Counsel					Document
04	Meta_Kadrey_00208	Mate Veden 00000							5/19/2023 0:40	Email providing legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	StandAlone
		844							3/19/2023 0.40	advice concerning	Automey Guent	Counsel			Privilegeu - neuact	EPPAIL	Document
										copyright issues							
	Meta_Kadrey_00231 275	Meta_Kadrey_00231 275							5/4/2023 16:10	Chat reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	StandAlone Document
ľ		.,,								copyright and open		Course					Document
										source issues							
	Meta_Kadrey_00231								12/8/2022 0:31	Image reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Withhold	WP Chats	Attachment
	279	277								advice concerning copyright issues		Counsel					
										сорупанизась							
	Meta_Kadrey_00209								3/20/2023 20:58	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
	026	018								advice concerning contract issues		Counsel					
	Meta_Kadrey_00209 314	Meta_Kadrey_00209 314							1/4/2024 8:01	Email Chain reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	StandAlone Document
	-	-								copyright issues		Counse					Document
156	Meta_Kadrey_00094	Mate Kodrau 00004							6/30/2023 7:01	Document reflecting legal	Attorney Client	MPI In-House Legal			Debil- and Redout	EMAIL	Attachment
		825							6/30/2023 7:01	Document reflecting legal advice concerning	Attorney Client	Counsel Counsel			Privileged - Redact	EMAIL	Attachment
										copyright, data privacy,							
										and safety issues							
	Meta_Kadrey_00094 879	Meta_Kadrey_00094 877							5/6/2023 20:10	Document providing legal advice concerning safety	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
										issues		- Table					
168	Meta_Kadrey_00209	Meta Kadrey 00209							3/11/2023 0:07	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Attachment
		344							322200000	advice concerning	l line, out in	Counsel			geo manou		
										contract issues							
																	1

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	cc	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationsh
169	Meta_Kadrey_00209 461	Meta_Kadrey_00209 461							1/28/2023 1:12	Email Chain reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	StandAlone Document
170		Meta_Kadrey_00209 464							10/18/2022 15:34	Chat reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Parent
172		Meta_Kadrey_00209 473							7/20/2023 4:22	Chat reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	StandAlone Document
179	Meta_Kadrey_00203 759	Meta_Kadrey_00203 750							7/10/2023 19:47	Document reflecting legal advice concerning communications with third parties	Attorney Client	MPI In-House Legal Counsel				EMAIL	Attachment
180	Meta_Kadrey_00203 763	Meta_Kadrey_00203 750							7/10/2023 19:47	Document reflecting legal advice concerning regulatory and contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
184	Meta_Kadrey_00203 781	Meta_Kadrey_00203 781							1/17/2024 3:40	Email Chain reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	StandAlone Document
188	Meta_Kadrey_00093 523	Meta_Kadrey_00093 522							5/7/2023 19:32	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
196	Meta_Kadrey_00203 835	Meta_Kadrey_00203 827							7/8/2023 7:10	Document reflecting legal advice concerning communications with third parties	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
197	Meta_Kadrey_00203 839	Meta_Kadrey_00203 827							7/8/2023 7:10	Document reflecting legal advice concerning regulatory and contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
203		Meta_Kadrey_00203 857							7/8/2023 7:00	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
204		Meta_Kadrey_00203 857							7/8/2023 7:00	Document reflecting legal advice concerning regulatory and contract	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
207	Meta_Kadrey_00094 824	Meta_Kadrey_00094 819							7/11/2023 23:13	issues Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment

210					BCC	WhatsApp	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/	Data Type	Family Relationshi
210						Chat Participants							Not Privileged		
	Meta_Kadrey_00203 909	Meta_Kadrey_00203 909					7/13/2023 17:01	Document reflecting legal advice concerning contract issues		MPI In-House Legal Counsel			rivileged - Redact		StandAlone Document
	Meta_Kadrey_00204 009	Meta_Kadrey_00203 983					5/31/2023 6:53	Document reflecting legal advice concerning data privacy and safety issues		MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
218	Meta_Kadrey_00204 010	Meta_Kadrey_00203 983					5/31/2023 6:53	Document reflecting legal advice concerning copyright, data privacy, and safety issues		MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
220							6/26/2023 4:20	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
223							6/26/2023 4:20	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
227	Meta_Kadrey_00204 032	Meta_Kadrey_00204 032					1/17/2024 15:02	Email Chain reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact		StandAlone Document
	Meta_Kadrey_00204 043	Meta_Kadrey_00204 041					4/16/2024 21:12	Document reflecting legal advice concerning safety issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
232	Meta_Kadrey_00204 045	Meta_Kadrey_00204 044					3/18/2024 22:31	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
234							4/1/2024 23:37	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
	Meta_Kadrey_00204 096	Meta_Kadrey_00204 095					6/8/2023 3:36	Chat reflecting legal advice concerning open source policy and contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	WP Chats	Parent

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	СС	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationshi
249									10/18/2023 14:02	Email reflecting legal advice concerning this litigation	Attorney Client;Work Product	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
252									10/25/2023 14:02	Email reflecting legal advice concerning this litigation	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
257									6/22/2023 13:32	Email reflecting legal advice concerning data privacy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
		Meta_Kadrey_00211 241							4/25/2023 14:01	Email reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	StandAlone Document
261									1/23/2023 15:46	Email seeking legal advice concerning product development and open source issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
265									1/23/2023 15:46	Email seeking legal advice concerning product development and contract issues		MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
266									1/23/2023 15:46	Email seeking legal advice concerning product development and open source issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
267									1/23/2023 15:46	Email seeking legal advice concerning product development and open source issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
274	Meta_Kadrey_00211 245	Meta_Kadrey_00211 245							4/14/2023 1:34	Chat reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	StandAlone Document
275	Meta_Kadrey_00211 247	Meta_Kadrey_00211 247							7/10/2023 16:27	Email Chain reflecting legal advice concerning this litigation	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Parent
		Meta_Kadrey_00211 247							7/10/2023 16:27	Image reflecting legal advice concerning data privacy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
277									4/18/2023 19:32	Chat reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	StandAlone Document

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	CC	BCC	WhatsApp	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/	Data Type	Family Relationship
								Chat Participants							Not Privileged		
282									7/11/2023 17:30	Chat seeking legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
283			-						7/11/2023 17:30	Chat seeking legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
284	Meta_Kadrey_00211 257	Meta_Kadrey_00211 257							12/6/2022 20:27	Chat reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Parent
287									7/5/2023 21:55	Image providing information for the purpose of facilitating legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
306	Meta_Kadrey_00096 360	Meta_Kadrey_00095 999							5/28/2024 4:51	Document reflecting legal advice concerning copyright, privacy, and regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
309	Meta_Kadrey_00096 377	Meta_Kadrey_00096 374							5/27/2024 20:22	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
312	Meta_Kadrey_00096 429	Meta_Kadrey_00096 378							5/28/2024 1:38	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
326	Meta_Kadrey_00096 536	Meta_Kadrey_00096 533							5/6/2024 19:24	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
327	Meta Kadrey ,00096 550	Meta Kadrey .00096							4/23/2024 21:36	Email Chain seeking and reflecting legal advice concerning advertising	Attorney Client	MPI in-House Legal Counsel			Privileged - Redact	EMAIL	StandAlone Document

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	CC	BCC	WhatsApp Chat	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationshi
								Participants							, wor have ged		
329	Meta Kadrey 00096 596	Meta_Kadrey_00096 595							4/14/2024 23:55	Email Chain seeking and reflecting legal advice concerning open source policy	Attorney Client	MPIIn-House Legăl Counsel			Privileged - Redact	EMAIL	StandAlone Document
336	Meta_Kadrey_00096 643	Meta_Kadrey_00096 640							3/29/2024 19:04	Document reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
										regulatory and safety issues							
337	Meta_Kadrey_00096 644	Meta_Kadrey_00096 640							3/29/2024 19:04	Document providing legal advice concerning data privacy and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
339	Meta_Kadrey_00096								3/22/2024 0:00	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	657	655								advice concerning copyright issues		Counsel					
341	Meta_Kadrey_00096 705	Meta_Kadrey_00096 701							3/21/2024 17:45	Document seeking and reflecting legal advice concerning data privacy and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
343	Meta_Kadrey_00096 741	Meta_Kadrey_00096 739							3/18/2024 20:20	Document providing legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
344	Meta_Kadrey_00096 742	Meta_Kadrey_00096 739							3/18/2024 20:20	Document providing legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
347	Meta_Kadrey_00096 759	Meta_Kadrey_00096 757							3/20/2024 19:08	Document reflecting legal advice concerning regulatory and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
349		Meta_Kadrey_00096 814							3/12/2024 21:18	Document providing legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
357	Meta_Kadrey_00096 898	Meta_Kadrey_00096 883							2/24/2024 10:30	Document reflecting legal advice concerning regulatory and contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment

riv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	cc	BCC	WhatsApp	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/	Data Type	Family Relationshi
-		• ***						Chat Participants							Not Privileged		
362	Meta_Kadrey_00097 221	Meta_Kadrey_00096 941							2/7/2024 2:38	Document reflecting legal advice concerning regulatory and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
368	Meta_Kadrey_00097 236	Meta_Kadrey_00097 233							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
371	Meta_Kadrey_00097 255	Meta_Kadrey_00097 251							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
374		Meta_Kadrey_00097 270							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
377	Meta_Kadrey_00097 291	Meta_Kadrey_00097 288							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
380	Meta_Kadrey_00097 310	Meta_Kadrey_00097 306							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
383		Meta_Kadrey_00097 325							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
386		Meta_Kadrey_00097 343							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
389		Meta_Kadrey_00097 361							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
392	Meta_Kadrey_00097 382	Meta_Kadrey_00097 379							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
397	Meta_Kadrey_00231 372	Meta_Kadrey_00231 366							7/12/2024 18:30	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
405	Meta_Kadrey_00097 435	Meta_Kadrey_00097 432							7/11/2024 14:29	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
412									7/10/2024 16:54	Document providing legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
413									7/10/2024 16:54	Document providing legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
415	Meta_Kadrey_00097 518	Meta_Kadrey_00097 515							7/9/2024 22:46	Document seeking and containing legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	CC	BCC	WhatsApp	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/	Data Type	Family Relationsh
								Chat Participants							Not Privileged		
417	Meta_Kadrey_00097 526	Meta_Kadrey_00097 523							7/9/2024 1:04	Document seeking and containing legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
427	Meta_Kadrey_00097 549	Meta_Kadrey_00097 535							7/8/2024 21:42	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
434	Meta_Kadrey_00097 561	Meta_Kadrey_00097 535							7/8/2024 21:42	Document reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
438	Meta_Kadrey_00097 568	Meta_Kadrey_00097 535							7/8/2024 21:42	Document reflecting legal advice concerning regulatory issues and potential merger/acquisition deals	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
441	Meta_Kadrey_00097 598	Meta_Kadrey_00097 596							7/1/2024 20:27	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
442	Meta_Kadrey_00231 383	Meta_Kadrey_00231 383							7/5/2024 21:35						Not Privileged	EMAIL	Parent
	Meta_Kadrey_00231 392	Meta_Kadrey_00231 383							7/5/2024 21:35	Document reflecting legal advice concerning regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
450	Meta_Kadrey_00231 397	Meta_Kadrey_00231 383							7/5/2024 21:35	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
454	Meta_Kadrey_00231 406	Meta_Kadrey_00231 383							7/5/2024 21:35	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
458	Meta_Kadrey_00231 411	Meta_Kadrey_00231 383							7/5/2024 21:35	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
463	Meta_Kadrey_00097 690	Meta_Kadrey_00097 688							6/27/2024 20:23	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	CC	BCC	WhatsApp	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/	Data Type	Family Relationshi
								Chat Participants							Not Privileged		
465	Meta_Kadrey_00097 697	Meta_Kadrey_00097 694							6/28/2024 0:26	Document seeking and reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
467	Meta_Kadrey_00097 700	Meta_Kadrey_00097 698							6/28/2024 3:29	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
		Meta_Kadrey_00097 717							6/27/2024 2:03	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
471	Meta_Kadrey_00097 723	Meta_Kadrey_00097 722							6/26/2024 20:34	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
474	Meta_Kadrey_00231 422	Meta_Kadrey_00231 418							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
477	Meta_Kadrey_00231 441	Meta_Kadrey_00231 437							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
480	Meta_Kadrey_00097 741	Meta_Kadrey_00097 738							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
	Meta_Kadrey_00097 760	Meta_Kadrey_00097 757							6/28/2024 21:45	Document seeking and reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
485	Meta_Kadrey_00097 763	Meta_Kadrey_00097 761							6/28/2024 18:24	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
490	Meta_Kadrey_00097 785	Meta_Kadrey_00097 782							6/20/2024 18:46	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment
491	Meta_Kadrey_00097 792	Meta_Kadrey_00097 782							6/20/2024 18:46	Document seeking and reflecting legal advice concerning regulatory and safety issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
496	Meta_Kadrey_00097 886	Meta_Kadrey_00097 883							6/7/2024 20:04	Document providing legal advice concerning regulatory and safety issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
	Meta_Kadrey_00097 887	Meta_Kadrey_00097 883							6/7/2024 20:04	Document seeking and reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
500	Meta_Kadrey_00097 896	Meta_Kadrey_00097 895							6/12/2024 19:45	1	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	EMAIL	Attachment

riv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationshi
508	Meta_Kadrey_00097 988	Meta_Kadrey_00097 986							7/20/2024 20:46	Document reflecting legal advice concerning safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
509	Meta_Kadrey_00097 989	Meta_Kadrey_00097 986							7/20/2024 20:46	Document reflecting legal advice concerning safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL.	Attachment
510	Meta_Kadrey_00097 990	Meta_Kadrey_00097 986							7/20/2024 20:46	Document reflecting legal advice concerning safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
524	Meta_Kadrey_00098 720	Meta_Kadrey_00098 717							7/11/2023 17:54	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
526		Meta_Kadrey_00098 734							7/6/2023 17:17	Email reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Parent
527	Meta_Kadrey_00098 737	Meta_Kadrey_00098 734							7/6/2023 17:17	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
529	Meta_Kadrey_00098 741	Meta_Kadrey_00098 738							6/30/2023 18:10	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
530	Meta_Kadrey_00098 813	Meta_Kadrey_00098 813							6/29/2023 16:53	Email Chain seeking and reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel				EMAIL	Parent
531	Meta_Kadrey_00098 817	Meta_Kadrey_00098 813							6/29/2023 16:53	Document providing legal advice concerning copyright and safety issues	Attorney Client; Work Product	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
533	Meta_Kadrey_00098 829	Meta_Kadrey_00098 829							6/16/2023 19:16	Email Chain seeking and reflecting legal advice concerning data privacy and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Parent
534	Meta_Kadrey_00098 832	Meta_Kadrey_00098 829							6/16/2023 19:16	Document reflecting legal advice concerning copyright and safety	Attorney Client; Work Product	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
540	Meta_Kadrey_00098 888	Meta_Kadrey_00098 833							11/13/2023 18:33	Document reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
543	Meta_Kadrey_00098 912	Meta_Kadrey_00098 833							11/13/2023 18:33	Document reflecting legal advice concerning regulatory and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
552	Meta_Kadrey_00098 999	Meta_Kadrey_00098 833							11/13/2023 18:33	Document reflecting legal advice concerning copyright, privacy, and regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	cc	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationsh
	Meta_Kadrey_00099 017	Meta_Kadrey_00098 833							11/13/2023 18:33						Not Privileged	EMAIL	Attachment
	Meta_Kadrey_00099 162	Meta_Kadrey_00099 162							6/8/2023 18:56	Email reflecting legal advice concerning data privacy and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Parent
559	Meta_Kadrey_00099 163	Meta_Kadrey_00099 162							6/8/2023 18:56	Document reflecting legal advice concerning regulatory and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
	Meta_Kadrey_00099 177	Meta_Kadrey_00099 175							6/12/2023 3:10	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
562	Meta_Kadrey_00099 199	Meta_Kadrey_00099 175							6/12/2023 3:10	Document reflecting legal advice concerning regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
572	Meta_Kadrey_00099 299	Meta_Kadrey_00099 175							6/12/2023 3:10	Document reflecting legal advice concerning data privacy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
576	Meta_Kadrey_00099 310	Meta_Kadrey_00099 175							6/12/2023 3:10	Document reflecting legal advice concerning other litigation, product development, product release, regulatory, safety, and privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
584									5/31/2023 19:24	Document providing legal advice concerning open source policy	Attorney Client	External Legal Counsel			Privileged - Withhold	EMAIL	Attachment
	Meta_Kadrey_00099 419	Meta_Kadrey_00099 415							5/31/2023 4:35	Presentation reflecting legal advice concerning data privacy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
592	Meta_Kadrey_00099 460	Meta_Kadrey_00099 415							5/31/2023 4:35	Document seeking and reflecting legal advice concerning communications with the board of directors	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	CC	BCC	WhatsApp	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/	Data Type	Family Relationship
								Chat Participants						- 11-11-11-1	Not Privileged	,-	,
596	Meta_Kadrey_00099	Meta_Kadrey_00099							6/2/2023 17:25	Email reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	827	826								advice concerning data privacy and safety issues		Counsel					
										privacy and surcey issues							
	M 4- W-4	Mar No.							c in inner	B		Manufacture 1					
598	Meta_Kadrey_00099 834	Meta_Kadrey_00099 826	'l						6/2/2023 17:25	Document reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
										copyright and data							
										privacy issues							
601	Meta_Kadrey_00099 841	Meta_Kadrey_00099 840							5/26/2023 1:36	Document reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
	041	640								copyright, data privacy,		Counset					
										and safety issues							
603	Meta_Kadrey_00099	Meta_Kadrey_00099	 						5/19/2023 15:48	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Redact	EMAIL	Attachment
	852	851								advice concerning copyright, privacy, and		Counsel					
										regulatory issues							
608	Mate Kedray 00100	Meta_Kadrey_00100							1/30/2024 20:34	Document reflecting legal	Attorney Client	MPI In-House Legal			Privileged - Withhold	FMAII	Attachment
	081	080							2007202420304	advice concerning	rational ducin	Counsel			Transport Transport	L. Fac	rucincia
										communications with government entities							
609	Meta_Kadrey_00100 082	Meta_Kadrey_00100 080	'l						1/30/2024 20:34	Document reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
	002	000								communications with		Courses					
										government entities							
615	Meta_Kadrey_00100 150	Meta_Kadrey_00100							1/19/2024 2:47	Document reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
										regulatory issues							
642	Meta Kadrey 00218	Meta_Kadrey_00218							6/9/2023 17:26	Document providing legal	Attorney Client	External Legal			Privileged - Withhold	EMAIL	Attachment
	594	593								advice concerning		Counsel			_		
										contract issues							
655									10/4/2022 0:02	Email seeking and	Attorney Client	MPI In-House Legal			Privileged - Withhold	EMAIL	Parent
										reflecting legal advice concerning copyright		Counsel					
										issues							
656									10/4/2022 0:02	Document seeking and	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
										reflecting legal advice concerning copyright		Counset					
										issues							

					WhatsApp		Privilege Description	Privilege Type	Legal Source	Email Subject		Data Type	Family Relationsh
					Chat Participants						Not Privileged		
660	Meta Kadrey 00218	Meta_Kadrey_00218				10/19/2022 18:32	Document seeking legal	Attorney Client	MPI In-House Legal		Privileged - Withhold	EMAIL	Attachment
		742					advice concerning		Counsel		_		
							contract issues						
671	Meta Kadrey 00218	Meta_Kadrey_00218				12/6/2022 17:22	Chat reflecting legal	Attorney Client	MPI In-House Legal		Privileged - Redact	WP Chats	StandAlone
		893					advice concerning		Counsel		_		Document
							copyright and data privacy issues						
							privacy issues						
		Meta_Kadrey_00218 897				12/1/2022 19:08	Chat reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel		Privileged - Redact	WP Chats	Attachment
ľ	900	09/					copyright and data		Couriset				
							privacy issues						
		Meta_Kadrey_00218				12/1/2022 19:08	Chat reflecting legal	Attorney Client	MPI In-House Legal		Privileged - Redact	WP Chats	Attachment
	901	897					advice concerning		Counsel				
							copyright and data privacy issues						
679	Meta_Kadrey_00218	Meta_Kadrey_00218				12/1/2022 21:49	Chat reflecting legal	Attorney Client	MPI In-House Legal		Privileged - Redact	WP Chats	Attachment
	906	904					advice concerning		Counsel				
							copyright and data privacy issues						
683	Meta Kadrey 00218	Meta_Kadrey_00218				12/1/2022 19:37	Chat reflecting legal	Attorney Client	MPI In-House Legal		Privileged - Redact	WP Chats	Attachment
		907					advice concerning	,	Counsel				
							copyright and data						
						3/28/2023 17:28	privacy issues						StandAlone
684		Meta_Kadrey_00218 913				3/28/2023 17:28	Chat reflecting legal advice concerning	Attorney Client	MPI In-House Legal Counsel		Privileged - Redact	WP Chats	Document
ľ							copyrightissues		- Comment				- Comment
690	Meta_Kadrey_00218	Meta_Kadrey_00218				12/1/2022 20:52	Chat reflecting legal	Attorney Client	MPI In-House Legal		Privileged - Redact	WP Chats	Attachment
		918					advice concerning		Counsel				
							copyright and data						
933						7/18/2023 2:26	privacy issues Document seeking legal	Attorney Client	MPI In-House Legal		Privileged - Withhold	WP Chats	Attached Parent
							advice concerning	,	Counsel				
							contract issues						
934						7/18/2023 2:26	Document seeking legal	Attorney Client	MPI In-House Legal		Privileged - Withhold	WP Chats	Attachment
							advice concerning		Counsel		_		
							contract issues						
935						7/18/2023 2:26	Document seeking legal	Attorney Client	MPI In-House Legal		Privileged - Withhold	WP Chats	Attachment
							advice concerning contract issues		Counsel				
							contractissues						
1021						2/22/2023 22:26	Document providing information for the	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	WP Chats	Attachment
							purpose of facilitating		- Constant				
							legal advice concerning						
							contract issues						
1302						9/7/2023 20:14	Document reflecting legal	Attorney Client	MPI In-House Legal		Privileged - Withhold	EMAIL	StandAlone
							advice concerning		Counsel				Document
							copyrightissues						
1303						8/11/2023 22:42	Document reflecting legal	Attorney Client	MPI In-House Legal		Privileged - Withhold	EMAIL	StandAlone
							advice concerning		Counsel				Document
							copyrightissues						
- 1							1						

riv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	cc	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationshi
1304									8/11/2023 23:01	Document reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	StandAlone Document
1307									3/14/2024 0:31	Email reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	StandAlone Document
1330									11/29/2023 2:32	Email reflecting legal advice concerning data privacy and safety issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	StandAlone Document
1373	Meta_Kadrey_00211 852	Meta_Kadrey_00213 852	1						1/5/2024 15:16	Chat reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			rivileged - Redact	WP Chats	StandAlone Document
1375									1/4/2024 18:16	Chat requesting information for the purpose of facilitating legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	WP Chats	StandAlone Document
1386									9/26/2023 23:05	Document reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	StandAlone Document
1388									7/3/2023 18:31	Chat requesting information for the purpose of facilitating legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	WP Chats	StandAlone Document
1390	Meta_Kadrey_00207 937	Meta_Kadrey_00207 936	7						8/28/2023 15:36	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	Attachment
1462									7/20/2023 14:17	Email seeking and containing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	StandAlone Document
1464									7/20/2023 19:30	Email seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	StandAlone Document
1466									7/20/2023 19:53	Email seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	StandAlone Document
1473									5/10/2023 17:47	Email reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	StandAlone Document

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Kadrey v Meta Platforms, Inc Case No 3 23-cv-03417-VC

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	То	СС	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged		Family Relationship
1497									7/18/2023 4:51	Chat seeking and reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivlieged - Withhold	WP Chats	StandAlone Document
1525									5/7/20244:47	Document seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	WP Chats	Attachment
1539	Meta_Kadrey_00208 534	Meta_Kadrey_00208 533							5/7/2024 4:47	Document seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	WP Chats	Attachment
1545									7/31/2023 23:01	Email providing information for the purpose of facilitating legal advice concerning copyright issues		MPI In-House Legal Counsel			rivileged - Withhold	EMAIL	StandAlone Document
1564									4/30/2024 12:19	Chat reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			rivileged - Withhold	WP Chats	StandAlone Document

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
11				4/15/2024	Document reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
37		Meta Platforms, Inc		11/16/2023	Spreadsheet seeking and reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
38		Meta Platforms, Inc		11/16/2023	Spreadsheet seeking and reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
43				5/3/2024	Document reflecting legal advice concerning data privacy	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
47	Meta_Kadrey_00146 455	Meta Platforms, Inc		10/31/2024	legal advice concerning	Attorney Client;Work Product	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
68				4/24/2024	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
75		Meta Platforms, Inc		11/20/2024	Document providing legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
80				5/22/2024	Document providing legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
81				6/4/2024	Document providing legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
82		Meta Platforms, Inc		9/11/2023	Document seeking and reflecting legal advice concerning open source and safety issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
106	Meta_Kadrey_00209 782			1/24/2023	Document seeking and containing legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Redact	GSUITE
121				4/9/2024	Document reflecting legal advice concerning product development, copyright, and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE

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Kadrey v. Meta Platforms, Inc. Case No. 3:23-cv-03417-VC

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
122				4/9/2024	Document providing legal advice concerning product development, copyright, and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Vithhold	GSUITE
132		Meta Platforms, Inc		11/20/2024	Document providing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Vithhold	GSUITE
142		Meta Platforms, Inc		11/20/2024	Document seeking legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Vithhold	GSUITE
146				6/5/2024	Spreadsheet seeking and containing legal advice concerning product development, copyright, and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Vithhold	GSUITE
147				6/5/2024	Spreadsheet seeking and containing legal advice concerning product development, copyright, and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Vithhold	GSUITE
156		Meta Platforms,	Author	2/23/2023	Document providing legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Vithhold	OneDrive

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
160				2/25/2024	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
169				9/16/2023	Document reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
170		Meta Platforms, Inc		9/7/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
171		Meta Platforms, Inc		9/7/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
172		Meta Platforms, Inc		9/7/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE

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Kadrey v. Meta Platforms, Inc. Case No. 3:23-cv-03417-VC

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
173		Meta Platforms, Inc		9/1/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
174		Meta Platforms, Inc		9/12/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
175		Meta Platforms, Inc		9/7/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
176		Meta Platforms, Inc		9/1/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
177		Meta Platforms, Inc		9/18/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
178		Meta Platforms, Inc		9/12/2023	Spreadsheet seeking and containing legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
180				9/6/2023	Document seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
181				9/6/2023	Document seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
182				9/6/2023	Document seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
194	Meta_Kadrey_00207 881			2/27/2024	Document reflecting legal advice concerning product development and contract issues	Attorney Client	MPI In-House Legal Counsel		^D rivileged - Withhold	OneDrive
197		Meta Platforms,		2/13/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive

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Kadrey v. Meta Platforms, Inc. Case No. 3:23-cv-03417-VC

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
198		Meta Platforms,	Author	3/16/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
199		Meta Platforms,	Author	3/15/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
205		Meta Platforms,	Author	3/16/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
207		Meta Platforms,	Author	3/22/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
209		Meta Platforms, Inc		10/24/2024	Document providing legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	Loose Docs
210				11/22/2022	Document providing legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
214				10/9/2023	Document providing legal advice concerning data privacy	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
216				10/26/2023	Document seeking and reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
217				10/26/2023	Document seeking and reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
220				11/6/2023	Document seeking and reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
	Meta_Kadrey_00207 915			1/10/2023	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
	Meta_Kadrey_00207 919			11/30/2022	Document reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
244				12/5/2023	Document providing legal advice concerning communications with the board of directors	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
265				9/20/2023	Document reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE

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Kadrey v. Meta Platforms, Inc. Case No. 3:23-cv-03417-VC

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
266		Meta Platforms,	Author	2/16/2023	Document providing legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
267		;Meta Platforms,	Author	2/16/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
268		Meta Platforms, Inc	Author	2/9/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
269		Meta Platforms,	Author	2/28/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
281				4/23/2024	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
282				7/24/2024	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
301	Meta_Kadrey_00207 901			2/23/2023	Document seeking and reflecting legal advice concerning copyright and contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive

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Kadrey v. Meta Platforms, Inc. Case No. 3:23-cv-03417-VC

Meta Platforms, Inc. Third Privilege Log (non-email) - December 13, 2024

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
306		Meta Platforms, Inc		10/31/2024	Document reflecting legal advice concerning copyright, data privacy, and safety issues		MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
307		Meta Platforms, Inc		10/31/2024	Document seeking and reflecting legal advice concerning copyright, data privacy, and safety issues	-	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
333				2/17/2022	Document providing information for the purpose of facilitating legal advice concerning regulatory issues	-	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE

Meta Platforms, Inc. Fourth Privilege Log - December 16, 2024

riv Log No.	Bates No.	Beg Attach	Custodians	Author/From	То	cc	BCC	Legal Source	Date	Privilege Description	Privilege Type
1	Meta_Kadrey_00204 207	Meta_Kadrey_00204 207						MPI In-House Legal Counsel	2/16/2024	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client
2	Meta_Kadrey_00232 034	Meta_Kadrey_00232 034						MPI In-House Legal Counsel	2/16/2024	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client
3	Meta_Kadrey_00146 516	Meta_Kadrey_00146 516						MPI In-House Legal Counsel	5/30/2023	Chat reflecting legal advice concerning open source policy	Attorney Client
4	Meta_Kadrey_00146 529	529						MPI In-House Legal Counsel	7/15/2023	Chat seeking legal advice concerning open source policy	Attorney Client
6	Meta_Kadrey_00218 578	Meta_Kadrey_00218 578						MPI In-House Legal Counsel	2/16/2024	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client
7	Meta_Kadrey_00081 290	Meta_Kadrey_00081 290						MPI In-House Legal Counsel	1/31/2023	Document reflecting legal advice concerning open source policy	Attorney Client
	Meta_Kadrey_00088 019	Meta_Kadrey_00088 019						MPI In-House Legal Counsel	5/23/2024	Document seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client
9	Meta_Kadrey_00078 520	Meta_Kadrey_00078 520						MPI In-House Legal Counsel	5/15/2024	Document seeking legal advice concerning open source policy	Attorney Client
10	Meta_Kadrey_00203 384	Meta_Kadrey_00203 384						MPI In-House Legal Counsel	4/29/2024	Spreadsheet reflecting legal advice concerning copyright issues	Attorney Client
	Meta_Kadrey_00154 876	Meta_Kadrey_00154 876						MPI In-House Legal Counsel	2/15/2024	Document seeking legal advice concerning data privacy	Attorney Client
12	Meta_Kadrey_00078 772	Meta_Kadrey_00078 772						MPI In-House Legal Counsel	10/5/2023	Document reflecting legal advice concerning copyright issues	Attorney Client
13	Meta_Kadrey_00203 748	Meta_Kadrey_00203 748						MPI In-House Legal Counsel	8/18/2023	Document reflecting legal advice concerning contract issues	Attorney Client
	Meta_Kadrey_00075 742	Meta_Kadrey_00075 742						MPI In-House Legal Counsel	2/29/2024	Document seeking legal advice concerning data privacy	Attorney Client
15	Meta_Kadrey_00075 853	Meta_Kadrey_00075 853						MPI In-House Legal Counsel	12/28/2023	Document reflecting legal advice concerning data privacy	Attorney Client
20	Meta_Kadrey_00078 949	Meta_Kadrey_00078 949						MPI In-House Legal Counsel	7/19/2023	Document reflecting legal advice concerning open source policy	Attorney Client

Email Subject	Filename	Withhold/ Redact/ Not Privileged	Data Type	Family Relationship
		rivileged - Redact	WhatsApp	Standalone
		rivileged - Redact	WhatsApp	Standalone
		rivileged - Redact	WhatsApp	Standalone
		rivileged - Redact	WhatsApp	Standalone
		rivileged - Redact	WhatsApp	Standalone
		rivileged - Redact	GSUITE	Parent
		rivileged - Redact	GSUITE	Parent
		rivileged - Redact	GSUITE	Parent
		rivileged - Redact	GSUITE	StandAlone Document
		rivileged - Redact	GSUITE	Parent
		rivileged - Redact	GSUITE	Parent
		rivileged - Redact	GSUITE	Parent
		rivileged - Redact	GSUITE	Parent
		rivileged - Redact	GSUITE	StandAlone Document
		rivileged - Redact	GSUITE	Parent

Meta Platforms, Inc. Fourth Privilege Log - December 16, 2024

Priv Log No.	Bates No.	Beg Attach	Custodians	Author/From	То	cc	BCC	Legal Source	Date	Privilege Description	Privilege Type
22	Meta_Kadrey_00079 085	Meta_Kadrey_00079 085						MPI In-House Legal Counset	4/14/2024	Email reflecting legal advice concerning regulatory issues	Attorney Client
25	Meta_Kadrey_00204 118	Meta_Kadrey_00204 115						MPI In-House Legal Counsel	5/22/2023	Document reflecting legal advice concerning open source policy	Attorney Client
26	Meta_Kadrey_00057 383	Meta_Kadrey_00057 383						MPI In-House Legal Counsel	12/13/2023	Document reflecting legal advice concerning open source policy	Attorney Client
27	492	492						MPI In-House Legal Counsel		advice concerning copyright and data privacy issues	Attorney Client
29	Meta_Kadrey_00079 277	Meta_Kadrey_00079 277						MPI In-House Legal Counsel		Document providing information for the purpose of facilitating legal advice concerning open source policy	Attorney Client
31	Meta_Kadrey_00081 007	Meta_Kadrey_00081 007						MPI In-House Legal Counsel	3/3/2023	Document seeking and reflecting legal advice concerning open source policy	Attorney Client
32	Meta_Kadrey_00064 717	Meta_Kadrey_00064 717						MPI In-House Legal Counsel		Document seeking legal advice concerning data privacy	Attorney Client
33	Meta_Kadrey_00081 010	Meta_Kadrey_00081 010						MPI In-House Legal Counsel		Document seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client
34	Meta_Kadrey_00062 355	Meta_Kadrey_00062 355						MPI In-House Legal Counsel		Document reflecting legal advice concerning product development	Attorney Client
35	Meta_Kadrey_00062 774	Meta_Kadrey_00062 774						MPI In-House Legal Counsel	2/15/2024	Document reflecting legal advice concerning regulatory issues	Attorney Client

Email Subject	Filename	Withhold/ Redact/ Not Privileged	Data Type	Family Relationship
		Privileged - Redact	WP Chats	Parent
		Privileged - Redact	WP Chats	Attachment
		Privileged - Redact	GSUITE	Parent
		Privileged - Redact	GSUITE	Parent
		Privileged - Redact	GSUITE	Parent
		Privileged - Redact	GSUITE	Parent
		Privileged - Redact	GSUITE	Parent
		Privileged - Redact	GSUITE	StandAlone Document
		Privileged - Redact	GSUITE	StandAlone Document
		Privileged - Redact	GSUITE	StandAlone Document

Meta Platforms, Inc. Fourth Privilege Log - December 16, 2024

Priv Log No.	Bates No.	Beg Attach	Custodians	Author/From	То	cc	BCC	Legal Source	Date	Privilege Description	Privilege Type
36	Meta_Kadrey_00088 718	Meta_Kadrey_00088 718						MPI In-House Legal Counsel	6/4/2024	Document seeking legal advice concerning copyright and data privacy issues	Attorney Client
37	Meta_Kadrey_00052 619	619						MPI In-House Legal Counsel	2/6/2024	Document reflecting legal advice concerning regulatory and data privacy issues	Attorney Client
38	Meta_Kadrey_00096 744	Meta_Kadrey_00096 743						MPI In-House Legal Counsel		Document seeking and reflecting legal advice concerning data privacy	Attorney Client
39	845	Meta_Kadrey_00096 844						MPI In-House Legal Counsel	3/7/2024	Document seeking and reflecting legal advice concerning data privacy	Attorney Client
40	Meta_Kadrey_00097 457	Meta_Kadrey_00097 446						MPI In-House Legal Counsel	7/10/2024	Document reflecting legal advice concerning regulatory issues and potential merger/acquisition deals	Attorney Client
42	Meta_Kadrey_00098 256	Meta_Kadrey_00098 256						MPI In-House Legal Counsel	7/18/2024	Email reflecting legal advice concerning communications with third parties	Attorney Client
43	Meta_Kadrey_00099 888	Meta_Kadrey_00099 886						MPI In-House Legal Counsel		Email seeking and reflecting legal advice concerning data privacy and safety issues	Attorney Client
	896	Meta_Kadrey_00099 895						MPI In-House Legal Counsel		Email seeking and reflecting legal advice concerning data privacy and safety issues	Attorney Client
45	Meta_Kadrey_00100 900	Meta_Kadrey_00100 839						MPI In-House Legal Counsel	9/11/2023	Document reflecting legal advice concerning regulatory issues	Attorney Client

Email Subject	Filename	Withhold/ Redact/ Not Privileged	Data Type	Family Relationship
		Privileged - Redact	GSUITE	Parent
		Privileged - Redact	GSUITE	StandAlone Document
		Privileged - Redact	EMAIL	Attachment
		Privileged - Redact	EMAIL	Attachment
		Privileged - Redact	EMAIL	Attachment
		Privileged - Redact	EMAIL	Parent
		Privileged - Redact	EMAIL	Attached Parent
		Privileged - Redact	EMAIL	Attached Parent
		Privileged - Redact	WP Chats	Attachment

Kadey v. Meta Platforms, Inc.
Case No. 2:23 cv 03417-VC
Fourth Privilege Log - December 15, 2024
Attorneys' Syes Only

Priv Log No.	Bates No.	Beg Attach	Custodians	Author/From	То	cc	BCC	Legal Source	Date	Privilege Description	Privilege Type
		Meta_Kadrey_00093 954						MPI In-House Legal Counsel		Chat reflecting legal advice concerning copyright, data privacy, and safety issues	
	Meta_Kadrey_00146 533	Meta_Kadrey_00146 533						MPI In-House Legal Counsel	7/24/2023	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client
	Meta_Kadrey_00204 117	Meta_Kadrey_00204 115						MPI In-House Legal Counsel		Image reflecting legal advice concerning open source policy	Attorney Client

Email Subject	Filename	Withhold/ Redact/ Not Privileged	Data Type	Family Relationship
		Privileged - Redact	WhatsApp	Standalone
		Privileged - Withhold	WhatsApp	Standalone
		Privileged - Withhold	WP Chats	Attachment