

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").<sup>1</sup>

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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<sup>1</sup> 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.

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 in-house 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’s 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 non-attorney 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 examples<sup>2</sup>:

- **Meta\_Kadrey\_00097364.** This presentation titled “[REDACTED]” 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 “[REDACTED]” 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.

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

## II. DEFENDANT’S STATEMENT<sup>3</sup>

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 in-house legal team.<sup>4</sup> Notably, Meta’s in-house team includes approximately 1,500 attorneys who are

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<sup>3</sup> Following the parties’ meet and confer on December 17, Meta conducted a document-by-document 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.

<sup>4</sup> 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 in-house 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).<sup>5</sup>

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 justification 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 non-attorneys 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

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<sup>5</sup> 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 “ [REDACTED] [REDACTED] ” The redactions in Meta\_Kadrey\_00096657 that reflect legal advice on copyright issues would make sense given this section’s discussion of the “ [REDACTED] ” 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.

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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*

# **EXHIBIT A**

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	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							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							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							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							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							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							1/15/2024 21:37	Document reflecting legal advice concerning copyright, privacy, and regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
44	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
53	Meta_Kadrey_00209 929	Meta_Kadrey_00209 927							7/6/2023 12:06	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
68									10/11/2023 14:03	Email reflecting legal advice concerning this litigation	Attorney Client,Work Product	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	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	Email seeking legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
91	Meta_Kadrey_00208844	Meta_Kadrey_00208844							5/19/2023 0:40	Email providing legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	StandAlone Document
130	Meta_Kadrey_00231275	Meta_Kadrey_00231275							5/4/2023 16:10	Chat reflecting legal advice concerning copyright and open source issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	StandAlone Document
133	Meta_Kadrey_00231279	Meta_Kadrey_00231277							12/8/2022 0:31	Image reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
149	Meta_Kadrey_00209026	Meta_Kadrey_00209018							3/20/2023 20:58	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
153	Meta_Kadrey_00209314	Meta_Kadrey_00209314							1/4/2024 8:01	Email Chain reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	StandAlone Document
156	Meta_Kadrey_00094828	Meta_Kadrey_00094825							6/30/2023 7:01	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
158									5/17/2023 18:23	Document providing legal advice concerning copyright, data privacy, and safety issues	Attorney Client	██████ MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
160									5/5/2023 23:47	Document providing legal advice concerning copyright, data privacy, and safety issues	Attorney Client	██████ MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
162	Meta_Kadrey_00094879	Meta_Kadrey_00094877							5/6/2023 20:10	Document providing legal advice concerning safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
168	Meta_Kadrey_00209351	Meta_Kadrey_00209344							3/11/2023 0:07	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
169	Meta_Kadrey_00209461	Meta_Kadrey_00209461							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_00209464	Meta_Kadrey_00209464							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_00209473	Meta_Kadrey_00209473							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_00203759	Meta_Kadrey_00203750							7/10/2023 19:47	Document reflecting legal advice concerning communications with third parties	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/Not Privileged	Data Type	Family Relationship
180	Meta_Kadrey_00203763	Meta_Kadrey_00203750							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_00203781	Meta_Kadrey_00203781							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_00093523	Meta_Kadrey_00093522							5/7/2023 19:32	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
191									9/22/2023 15:41	Email seeking legal advice concerning product release	Attorney Client				Privileged - Withhold	EMAIL	StandAlone Document
196	Meta_Kadrey_00203835	Meta_Kadrey_00203827							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_00203839	Meta_Kadrey_00203827							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_00203866	Meta_Kadrey_00203857							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_00203869	Meta_Kadrey_00203857							7/8/2023 7:00	Document reflecting legal advice concerning regulatory and contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
207	Meta_Kadrey_00094824	Meta_Kadrey_00094819							7/11/2023 23:13	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
210	Meta_Kadrey_00203909	Meta_Kadrey_00203909							7/13/2023 17:01	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	StandAlone Document
217	Meta_Kadrey_00204009	Meta_Kadrey_00203983							5/31/2023 6:53	Document reflecting legal advice concerning data privacy and safety issues	Attorney Client,Work Product	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
218	Meta_Kadrey_00204010	Meta_Kadrey_00203983							5/31/2023 6:53	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client,Work Product	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	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									6/26/2023 4:20	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	EMAIL	StandAlone Document
230	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			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							6/8/2023 3:36	Chat reflecting legal advice concerning open source policy and contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Parent
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
260	Meta_Kadrey_00211 241	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	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	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	WP Chats	StandAlone Document
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_00096 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

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/Not Privileged	Data Type	Family Relationship
327	Meta_Kadrey_00096550	Meta_Kadrey_00096550	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	4/23/2024 21:36	Email Chain seeking and reflecting legal advice concerning advertising	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	StandAlone Document
329	Meta_Kadrey_00096595	Meta_Kadrey_00096595	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	4/14/2024 23:55	Email Chain seeking and reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	StandAlone Document
336	Meta_Kadrey_00096643	Meta_Kadrey_00096640	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	3/29/2024 19:04	Document reflecting legal advice concerning regulatory and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	[REDACTED]	Privileged - Withhold	EMAIL	Attachment
337	Meta_Kadrey_00096644	Meta_Kadrey_00096640	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	3/29/2024 19:04	Document providing legal advice concerning data privacy and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	[REDACTED]	Privileged - Withhold	EMAIL	Attachment
339	Meta_Kadrey_00096657	Meta_Kadrey_00096655	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	3/22/2024 0:00	Document reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attachment
341	Meta_Kadrey_00096705	Meta_Kadrey_00096701	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	3/21/2024 17:45	Document seeking and reflecting legal advice concerning data privacy and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attachment
342	Meta_Kadrey_00096739	Meta_Kadrey_00096739	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	3/18/2024 20:20	Email seeking legal advice concerning data privacy and safety issues	Attorney Client	[REDACTED]	[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Parent
343	Meta_Kadrey_00096741	Meta_Kadrey_00096739	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	3/18/2024 20:20	Document providing legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	[REDACTED]	Privileged - Withhold	EMAIL	Attachment
344	Meta_Kadrey_00096742	Meta_Kadrey_00096739	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	3/18/2024 20:20	Document providing legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	[REDACTED]	Privileged - Withhold	EMAIL	Attachment



Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	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_00096759	Meta_Kadrey_00096757							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_00096817	Meta_Kadrey_00096814							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_00096898	Meta_Kadrey_00096883							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_00097221	Meta_Kadrey_00096941							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_00097236	Meta_Kadrey_00097233							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_00097255	Meta_Kadrey_00097251							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_00097273	Meta_Kadrey_00097270							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_00097291	Meta_Kadrey_00097288							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_00097310	Meta_Kadrey_00097306							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_00097328	Meta_Kadrey_00097325							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_00097346	Meta_Kadrey_00097343							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_00097364	Meta_Kadrey_00097361							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_00097382	Meta_Kadrey_00097379							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_00231372	Meta_Kadrey_00231366							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_00097435	Meta_Kadrey_00097432							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

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationship
415	Meta_Kadrey_00097 518	Meta_Kadrey_00097 515	[REDACTED]						7/9/2024 22:46	Document seeking and containing legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	[REDACTED]	Privileged - Withhold	EMAIL	Attachment
417	Meta_Kadrey_00097 526	Meta_Kadrey_00097 523	[REDACTED]						7/9/2024 1:04	Document seeking and containing legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	[REDACTED]	Privileged - Withhold	EMAIL	Attachment
418	Meta_Kadrey_00231 379	Meta_Kadrey_00231 379	[REDACTED]						7/9/2024 0:11	Email Chain providing legal advice concerning regulatory and data privacy issues	Attorney Client	[REDACTED]	[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	StandAlone Document
427	Meta_Kadrey_00097 549	Meta_Kadrey_00097 535	[REDACTED]						7/8/2024 21:42	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attachment
434	Meta_Kadrey_00097 561	Meta_Kadrey_00097 535	[REDACTED]						7/8/2024 21:42	Document reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attachment
438	Meta_Kadrey_00097 568	Meta_Kadrey_00097 535	[REDACTED]						7/8/2024 21:42	Document reflecting legal advice concerning regulatory issues and potential merger/acquisition deals	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attachment
441	Meta_Kadrey_00097 598	Meta_Kadrey_00097 596	[REDACTED]						7/1/2024 20:27	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attachment

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/Not Privileged	Data Type	Family Relationship
442	Meta_Kadrey_00231383	Meta_Kadrey_00231383							7/5/2024 21:35						Not Privileged	EMAIL	Parent
446	Meta_Kadrey_00231382	Meta_Kadrey_00231383							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_00231397	Meta_Kadrey_00231383							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_00231406	Meta_Kadrey_00231383							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_00231411	Meta_Kadrey_00231383							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_00097690	Meta_Kadrey_00097688							6/27/2024 20:23	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
465	Meta_Kadrey_00097697	Meta_Kadrey_00097694							6/28/2024 0:26	Document seeking and reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
467	Meta_Kadrey_00097700	Meta_Kadrey_00097698							6/28/2024 3:29	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
469	Meta_Kadrey_00097718	Meta_Kadrey_00097717							6/27/2024 2:03	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
471	Meta_Kadrey_00097723	Meta_Kadrey_00097722							6/26/2024 20:34	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
474	Meta_Kadrey_00231422	Meta_Kadrey_00231418							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
477	Meta_Kadrey_00231441	Meta_Kadrey_00231437							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/Not Privileged	Data Type	Family Relationship
480	Meta_Kadrey_00097741	Meta_Kadrey_00097738							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
483	Meta_Kadrey_00097760	Meta_Kadrey_00097757							6/28/2024 21:45	Document seeking and reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
485	Meta_Kadrey_00097763	Meta_Kadrey_00097761							6/28/2024 18:24	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
490	Meta_Kadrey_00097785	Meta_Kadrey_00097782							6/20/2024 18:46	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
491	Meta_Kadrey_00097792	Meta_Kadrey_00097782							6/20/2024 18:46	Document seeking and reflecting legal advice concerning regulatory and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
496	Meta_Kadrey_00097886	Meta_Kadrey_00097883							6/7/2024 20:04	Document providing legal advice concerning regulatory and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
497	Meta_Kadrey_00097887	Meta_Kadrey_00097883							6/7/2024 20:04	Document seeking and reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
500	Meta_Kadrey_00097896	Meta_Kadrey_00097895							6/12/2024 19:45	Document seeking and reflecting legal advice concerning copyright and regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
508	Meta_Kadrey_00097988	Meta_Kadrey_00097986							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_00097989	Meta_Kadrey_00097986							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_00097990	Meta_Kadrey_00097986							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_00098720	Meta_Kadrey_00098717							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_00098734	Meta_Kadrey_00098734							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_00098737	Meta_Kadrey_00098734							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_00098741	Meta_Kadrey_00098738							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

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/Not Privileged	Data Type	Family Relationship
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			Privileged - Redact	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 issues	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
555	Meta_Kadrey_00098 017	Meta_Kadrey_00098 833							11/13/2023 18:33						Not Privileged	EMAIL	Attachment
558	Meta_Kadrey_00098 162	Meta_Kadrey_00098 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_00098 163	Meta_Kadrey_00098 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
561	Meta_Kadrey_00098 177	Meta_Kadrey_00098 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_00098 199	Meta_Kadrey_00098 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_00098 299	Meta_Kadrey_00098 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_00098 310	Meta_Kadrey_00098 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
588	Meta_Kadrey_00098 419	Meta_Kadrey_00098 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_00098 460	Meta_Kadrey_00098 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	To	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 618	Meta_Kadrey_00099 415							5/31/2023 4:35	Document reflecting legal advice concerning communications with the board of directors	Attorney Client	External Legal Counsel;MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
596	Meta_Kadrey_00099 827	Meta_Kadrey_00099 826							6/2/2023 17:25	Email reflecting legal advice concerning data privacy and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
598	Meta_Kadrey_00099 834	Meta_Kadrey_00099 826							6/2/2023 17:25	Document reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
601	Meta_Kadrey_00099 841	Meta_Kadrey_00099 840							5/26/2023 1:36	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
603	Meta_Kadrey_00099 852	Meta_Kadrey_00099 851							5/19/2023 15:48	Document reflecting legal advice concerning copyright, privacy, and regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
608	Meta_Kadrey_00100 081	Meta_Kadrey_00100 080							1/30/2024 20:34	Document reflecting legal advice concerning communications with government entities	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
609	Meta_Kadrey_00100 082	Meta_Kadrey_00100 080							1/30/2024 20:34	Document reflecting legal advice concerning communications with government entities	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
615	Meta_Kadrey_00100 150	Meta_Kadrey_00100 149							1/19/2024 2:47	Document reflecting legal advice concerning regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
642	Meta_Kadrey_00218 594	Meta_Kadrey_00218 593							6/9/2023 17:26	Document providing legal advice concerning contract issues	Attorney Client	External Legal Counsel			Privileged - Withhold	EMAIL	Attachment
655									10/4/2022 0:02	Email seeking and reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Parent
656									10/4/2022 0:02	Document seeking and reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
658	Meta_Kadrey_00218 743	Meta_Kadrey_00218 742							10/19/2022 18:32	Document seeking legal advice concerning contract issues	Attorney Client				Privileged - Withhold	EMAIL	Attachment

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/Not Privileged	Data Type	Family Relationship
660	Meta_Kadrey_00218750								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_00218893								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_00218900								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_00218901								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_00218906								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
683	Meta_Kadrey_00218911								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
684	Meta_Kadrey_00218913								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
690	Meta_Kadrey_00218924								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 contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
1065									7/7/2023 22:29	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

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationship
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									7/20/2023 19:53	Email seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	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



Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/Not Privileged	Data Type	Family Relationship
1497									7/18/2023 4:51	Chat seeking and reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	StandAlone Document
1525									5/7/2024 4:47	Document seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
1539	Meta_Kadrey_00208534	Meta_Kadrey_00208533							5/7/2024 4:47	Document seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
1545									7/31/2023 23:01	Email providing information for the purpose of facilitating legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
1564									4/30/2024 12:19	Chat reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	StandAlone Document

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
11		[REDACTED]	[REDACTED]	4/15/2024	Document reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
37		Meta Platforms, Inc	[REDACTED]	11/16/2023	Spreadsheet seeking and reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
38		Meta Platforms, Inc	[REDACTED]	11/16/2023	Spreadsheet seeking and reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
43		[REDACTED]	[REDACTED]	5/3/2024	Document reflecting legal advice concerning data privacy	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
47	Meta_Kadrey_00146455	Meta Platforms, Inc	[REDACTED]	10/31/2024	Document providing legal advice concerning product release	Attorney Client; Work Product	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
68		[REDACTED]	[REDACTED]	4/24/2024	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
75		Meta Platforms, Inc	[REDACTED]	11/20/2024	Document providing legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
80		[REDACTED]	[REDACTED]	5/22/2024	Document providing legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
81		[REDACTED]	[REDACTED]	6/4/2024	Document providing legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
82		Meta Platforms, Inc	[REDACTED]	9/11/2023	Document seeking and reflecting legal advice concerning open source and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
106	Meta_Kadrey_00209782	[REDACTED]	[REDACTED]	1/24/2023	Document seeking and containing legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Redact	GSUITE
121		[REDACTED]	[REDACTED]	4/9/2024	Document reflecting legal advice concerning product development, copyright, and data privacy issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
122		[REDACTED]	[REDACTED]	4/9/2024	Document providing legal advice concerning product development, copyright, and data privacy issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
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, Inc	Author	2/23/2023	Document providing legal advice concerning copyright issues	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

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

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
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
194	Meta_Kadrey_00207881			2/27/2024	Document reflecting legal advice concerning product development and contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive



Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
217		[REDACTED]	[REDACTED]	10/26/2023	Document seeking and reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
220		[REDACTED]	[REDACTED]	11/6/2023	Document seeking and reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
226	Meta_Kadrey_00207915	[REDACTED]	[REDACTED]	1/10/2023	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	OneDrive
227	Meta_Kadrey_00207919	[REDACTED]	[REDACTED]	11/30/2022	Document reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	OneDrive
244		[REDACTED]	[REDACTED]	12/5/2023	Document providing legal advice concerning communications with the board of directors	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
265		[REDACTED]	[REDACTED]	9/20/2023	Document reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
266		[REDACTED]; Meta Platforms, Inc	Author	2/16/2023	Document providing legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	OneDrive
267		[REDACTED] Meta Platforms, Inc	Author	2/16/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	OneDrive



Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
268		[REDACTED]; Meta Platforms, Inc	Author	2/9/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	OneDrive
269		[REDACTED] Meta Platforms, Inc	Author	2/28/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	OneDrive
281		[REDACTED]	[REDACTED]	4/23/2024	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
282		[REDACTED]	[REDACTED]	7/24/2024	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
301	Meta_Kadrey_00207901	[REDACTED]	[REDACTED]	2/23/2023	Document seeking and reflecting legal advice concerning copyright and contract issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	OneDrive
306		Meta Platforms, Inc		10/31/2024	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
307		Meta Platforms, Inc		10/31/2024	Document seeking and reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE

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

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

Highly Confidential  
Attorneys' Eyes Only

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



Priv Log No.	Bates No.	Beg Attach	Custodians	Author/From	To	CC	BCC	Legal Source	Date	Privilege Description	Privilege Type
22	Meta_Kadrey_00079085	Meta_Kadrey_00079085	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	4/14/2024	Email reflecting legal advice concerning regulatory issues	Attorney Client
25	Meta_Kadrey_00204118	Meta_Kadrey_00204118	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	5/22/2023	Document reflecting legal advice concerning open source policy	Attorney Client
26	Meta_Kadrey_00057383	Meta_Kadrey_00057383	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	12/13/2023	Document reflecting legal advice concerning open source policy	Attorney Client
27	Meta_Kadrey_00088492	Meta_Kadrey_00088492	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	5/23/2024	Document reflecting legal advice concerning copyright and data privacy issues	Attorney Client
29	Meta_Kadrey_00079277	Meta_Kadrey_00079277	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	3/14/2023	Document providing information for the purpose of facilitating legal advice concerning open source policy	Attorney Client
31	Meta_Kadrey_00081007	Meta_Kadrey_00081007	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	3/3/2023	Document seeking and reflecting legal advice concerning open source policy	Attorney Client
32	Meta_Kadrey_00064717	Meta_Kadrey_00064717	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	2/16/2023	Document seeking legal advice concerning data privacy	Attorney Client
33	Meta_Kadrey_00081010	Meta_Kadrey_00081010	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	1/12/2023	Document seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client
34	Meta_Kadrey_00062355	Meta_Kadrey_00062355	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	5/9/2024	Document reflecting legal advice concerning product development	Attorney Client
35	Meta_Kadrey_00062774	Meta_Kadrey_00062774	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	2/15/2024	Document reflecting legal advice concerning regulatory issues	Attorney Client
36	Meta_Kadrey_00088718	Meta_Kadrey_00088718	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	6/4/2024	Document seeking legal advice concerning copyright and data privacy issues	Attorney Client
37	Meta_Kadrey_00052619	Meta_Kadrey_00052619	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	2/6/2024	Document reflecting legal advice concerning regulatory and data privacy issues	Attorney Client

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

Priv Log No.	Bates No.	Beg Attach	Custodians	Author/From	To	CC	BCC	Legal Source	Date	Privilege Description	Privilege Type
38	Meta_Kadrey_00096744	Meta_Kadrey_00096743	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	3/8/2024	Document seeking and reflecting legal advice concerning data privacy	Attorney Client
39	Meta_Kadrey_00096845	Meta_Kadrey_00096844	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	3/7/2024	Document seeking and reflecting legal advice concerning data privacy	Attorney Client
40	Meta_Kadrey_00097457	Meta_Kadrey_00097446	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	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_00098256	Meta_Kadrey_00098256	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	7/18/2024	Email reflecting legal advice concerning communications with third parties	Attorney Client
43	Meta_Kadrey_00098888	Meta_Kadrey_00098886	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	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_00098896	Meta_Kadrey_00098895	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	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_00100900	Meta_Kadrey_00100839	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	9/11/2023	Document reflecting legal advice concerning regulatory issues	Attorney Client
56	Meta_Kadrey_00093954	Meta_Kadrey_00093954	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	2/24/2023	Chat reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client
5	Meta_Kadrey_00146533	Meta_Kadrey_00146533	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	7/24/2023	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client
24	Meta_Kadrey_00204117	Meta_Kadrey_00204115	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	5/22/2023	Image reflecting legal advice concerning open source policy	Attorney Client
54	Meta_Kadrey_00211053	Meta_Kadrey_00211053	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	7/14/2023	Email Chain seeking and reflecting legal advice concerning contract issues	Attorney Client

Email Subject	Filename	Withhold/Redact/Not Privileged	Data Type	Family Relationship
[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attachment
[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attachment
[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attachment
[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attached Parent
[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attached Parent
[REDACTED]	[REDACTED]	Privileged - Redact	WP Chats	Attachment
[REDACTED]	[REDACTED]	Privileged - Redact	WhatsApp	Standalone
[REDACTED]	[REDACTED]	Privileged - Withhold	WhatsApp	Standalone
[REDACTED]	[REDACTED]	Privileged - Withhold	WP Chats	Attachment
[REDACTED]	[REDACTED]	Privileged - Withhold	WP Chats	Parent

# **EXHIBIT B**

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationship
8									9/26/2023 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							2/23/2023 21:22	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
31									2/26/2024 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							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							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							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							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

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/Not Privileged	Data Type	Family Relationship
44	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
53	Meta_Kadrey_00209 929	Meta_Kadrey_00209 927							7/6/2023 12:06	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
68									10/11/2023 14:03	Email reflecting legal advice concerning this litigation	Attorney Client;Work Product	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
73									9/18/2023 14:21	Email seeking legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
91	Meta_Kadrey_00208 844	Meta_Kadrey_00208 844							5/19/2023 0:40	Email providing legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	StandAlone Document
130	Meta_Kadrey_00231 275	Meta_Kadrey_00231 275							5/4/2023 16:10	Chat reflecting legal advice concerning copyright and open source issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	StandAlone Document
133	Meta_Kadrey_00231 279	Meta_Kadrey_00231 277							12/8/2022 0:31	Image reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
149	Meta_Kadrey_00209 026	Meta_Kadrey_00209 018							3/20/2023 20:58	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
153	Meta_Kadrey_00209 314	Meta_Kadrey_00209 314							1/4/2024 8:01	Email Chain reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	StandAlone Document
156	Meta_Kadrey_00094 828	Meta_Kadrey_00094 825							6/30/2023 7:01	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
162	Meta_Kadrey_00094 879	Meta_Kadrey_00094 877							5/6/2023 20:10	Document providing legal advice concerning safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
168	Meta_Kadrey_00209 351	Meta_Kadrey_00209 344							3/11/2023 0:07	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment



Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationship
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	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	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			Privileged - Redact	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 865	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 869	Meta_Kadrey_00203 857							7/8/2023 7:00	Document reflecting legal advice concerning regulatory and contract issues	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	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/Not Privileged	Data Type	Family Relationship
210	Meta_Kadrey_00203909	Meta_Kadrey_00203909							7/13/2023 17:01	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	StandAlone Document
217	Meta_Kadrey_00204009	Meta_Kadrey_00203983							5/31/2023 6:53	Document reflecting legal advice concerning data privacy and safety issues	Attorney Client;Work Product	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
218	Meta_Kadrey_00204010	Meta_Kadrey_00203983							5/31/2023 6:53	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client;Work Product	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
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									6/26/2023 4:20	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
227	Meta_Kadrey_00204032	Meta_Kadrey_00204032							1/17/2024 15:02	Email Chain reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	StandAlone Document
230	Meta_Kadrey_00204043	Meta_Kadrey_00204041							4/16/2024 21:12	Document reflecting legal advice concerning safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
232	Meta_Kadrey_00204045	Meta_Kadrey_00204044							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_00204095	Meta_Kadrey_00204095							6/8/2023 3:36	Chat reflecting legal advice concerning open source policy and contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	WP Chats	Parent

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationship
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
260	Meta_Kadrey_00211 241	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	Attorney Client	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
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	WP Chats	StandAlone Document

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/Not Privileged	Data Type	Family Relationship
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_00211257	Meta_Kadrey_00211257							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_00096360	Meta_Kadrey_00096999							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_00096377	Meta_Kadrey_00096374							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_00096429	Meta_Kadrey_00096378							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_00096536	Meta_Kadrey_00096533							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_00096550	Meta_Kadrey_00096550							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	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/Not Privileged	Data Type	Family Relationship
329	Meta_Kadrey_00096595	Meta_Kadrey_00096595							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
336	Meta_Kadrey_00096643	Meta_Kadrey_00096640							3/29/2024 19:04	Document reflecting legal advice concerning regulatory and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
337	Meta_Kadrey_00096644	Meta_Kadrey_00096640							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_00096657	Meta_Kadrey_00096655							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_00096705	Meta_Kadrey_00096701							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_00096741	Meta_Kadrey_00096739							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_00096742	Meta_Kadrey_00096739							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_00096759	Meta_Kadrey_00096757							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_00096817	Meta_Kadrey_00096814							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_00096888	Meta_Kadrey_00096883							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

Priv Log No.	Bates No.	BegAttach	Custodians	Author/From	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/ Not Privileged	Data Type	Family Relationship
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	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

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417	Meta_Kadrey_00097526	Meta_Kadrey_00097523							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_00097549	Meta_Kadrey_00097535							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_00097561	Meta_Kadrey_00097535							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_00097568	Meta_Kadrey_00097535							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_00097598	Meta_Kadrey_00097596							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_00231383	Meta_Kadrey_00231383							7/5/2024 21:35						Not Privileged	EMAIL	Parent
446	Meta_Kadrey_00231392	Meta_Kadrey_00231383							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_00231397	Meta_Kadrey_00231383							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_00231406	Meta_Kadrey_00231383							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_00231411	Meta_Kadrey_00231383							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_00097690	Meta_Kadrey_00097688							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	To	CC	BCC	WhatsApp Chat Participants	Date	Privilege Description	Privilege Type	Legal Source	Email Subject	Filename	Withhold/Redact/Not Privileged	Data Type	Family Relationship
465	Meta_Kadrey_00097697	Meta_Kadrey_00097694							6/28/2024 0:26	Document seeking and reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
467	Meta_Kadrey_00097700	Meta_Kadrey_00097698							6/28/2024 3:29	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
469	Meta_Kadrey_00097718	Meta_Kadrey_00097717							6/27/2024 2:03	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
471	Meta_Kadrey_00097723	Meta_Kadrey_00097722							6/26/2024 20:34	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
474	Meta_Kadrey_00231422	Meta_Kadrey_00231418							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
477	Meta_Kadrey_00231441	Meta_Kadrey_00231437							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
480	Meta_Kadrey_00097741	Meta_Kadrey_00097738							8/8/2024 20:00	Presentation reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
483	Meta_Kadrey_00097760	Meta_Kadrey_00097757							6/26/2024 21:45	Document seeking and reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
485	Meta_Kadrey_00097763	Meta_Kadrey_00097761							6/26/2024 18:24	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
490	Meta_Kadrey_00097785	Meta_Kadrey_00097782							6/20/2024 18:46	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
491	Meta_Kadrey_00097792	Meta_Kadrey_00097782							6/20/2024 18:46	Document seeking and reflecting legal advice concerning regulatory and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
496	Meta_Kadrey_00097886	Meta_Kadrey_00097883							6/7/2024 20:04	Document providing legal advice concerning regulatory and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
497	Meta_Kadrey_00097887	Meta_Kadrey_00097883							6/7/2024 20:04	Document seeking and reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
500	Meta_Kadrey_00097896	Meta_Kadrey_00097895							6/12/2024 19:45	Document seeking and reflecting legal advice concerning copyright and regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment



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508	Meta_Kadrey_00097988	Meta_Kadrey_00097986							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_00097989	Meta_Kadrey_00097986							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_00097990	Meta_Kadrey_00097986							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_00098720	Meta_Kadrey_00098717							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_00098734	Meta_Kadrey_00098734							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_00098737	Meta_Kadrey_00098734							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_00098741	Meta_Kadrey_00098738							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_00098813	Meta_Kadrey_00098813							6/29/2023 16:53	Email Chain seeking and reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Parent
531	Meta_Kadrey_00098817	Meta_Kadrey_00098813							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_00098829	Meta_Kadrey_00098829							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_00098832	Meta_Kadrey_00098829							6/16/2023 19:16	Document reflecting legal advice concerning copyright and safety issues	Attorney Client;Work Product	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
540	Meta_Kadrey_00098888	Meta_Kadrey_00098833							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_00098912	Meta_Kadrey_00098833							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_00098999	Meta_Kadrey_00098833							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

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555	Meta_Kadrey_00099 017	Meta_Kadrey_00098 833							11/13/2023 18:33						Not Privileged	EMAIL	Attachment
558	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
561	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
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			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

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596	Meta_Kadrey_00099 827	Meta_Kadrey_00099 826							6/2/2023 17:25	Email reflecting legal advice concerning data privacy and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
598	Meta_Kadrey_00099 834	Meta_Kadrey_00099 826							6/2/2023 17:25	Document reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
601	Meta_Kadrey_00099 841	Meta_Kadrey_00099 840							5/26/2023 1:36	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
603	Meta_Kadrey_00099 852	Meta_Kadrey_00099 851							5/19/2023 15:48	Document reflecting legal advice concerning copyright, privacy, and regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
608	Meta_Kadrey_00100 081	Meta_Kadrey_00100 080							1/30/2024 20:34	Document reflecting legal advice concerning communications with government entities	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
609	Meta_Kadrey_00100 082	Meta_Kadrey_00100 080							1/30/2024 20:34	Document reflecting legal advice concerning communications with government entities	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment
615	Meta_Kadrey_00100 150	Meta_Kadrey_00100 149							1/19/2024 2:47	Document reflecting legal advice concerning regulatory issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Redact	EMAIL	Attachment
642	Meta_Kadrey_00218 594	Meta_Kadrey_00218 593							6/9/2023 17:26	Document providing legal advice concerning contract issues	Attorney Client	External Legal Counsel			Privileged - Withhold	EMAIL	Attachment
655									10/4/2022 0:02	Email seeking and reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Parent
656									10/4/2022 0:02	Document seeking and reflecting legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	Attachment

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660	Meta_Kadrey_00218750	Meta_Kadrey_00218742							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_00218893	Meta_Kadrey_00218893							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_00218900	Meta_Kadrey_00218897							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_00218901	Meta_Kadrey_00218897							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_00218906	Meta_Kadrey_00218904							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
683	Meta_Kadrey_00218911	Meta_Kadrey_00218907							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
684	Meta_Kadrey_00218913	Meta_Kadrey_00218913							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
690	Meta_Kadrey_00218924	Meta_Kadrey_00218918							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 contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
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

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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_00211852	Meta_Kadrey_00211852							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_00207937	Meta_Kadrey_00207936							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									7/20/2023 19:53	Email seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	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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1497									7/18/2023 4:51	Chat seeking and reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	StandAlone Document
1525									5/7/2024 4:47	Document seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
1539	Meta_Kadrey_00208534	Meta_Kadrey_00208533							5/7/2024 4:47	Document seeking legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	Attachment
1545									7/31/2023 23:01	Email providing information for the purpose of facilitating legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	EMAIL	StandAlone Document
1564									4/30/2024 12:19	Chat reflecting legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel			Privileged - Withhold	WP Chats	StandAlone Document

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
11		[REDACTED]	[REDACTED]	4/15/2024	Document reflecting legal advice concerning copyright and data privacy issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
37		Meta Platforms, Inc	[REDACTED]	11/16/2023	Spreadsheet seeking and reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
38		Meta Platforms, Inc	[REDACTED]	11/16/2023	Spreadsheet seeking and reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
43		[REDACTED]	[REDACTED]	5/3/2024	Document reflecting legal advice concerning data privacy	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
47	Meta_Kadrey_00146455	Meta Platforms, Inc	[REDACTED]	10/31/2024	Document providing legal advice concerning product release	Attorney Client;Work Product	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
68		[REDACTED]	[REDACTED]	4/24/2024	Document reflecting legal advice concerning open source policy	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE

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		[REDACTED]	[REDACTED]	5/22/2024	Document providing legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
81		[REDACTED]	[REDACTED]	6/4/2024	Document providing legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	GSUITE
82		Meta Platforms, Inc	[REDACTED]	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_00209782	[REDACTED]	[REDACTED]	1/24/2023	Document seeking and containing legal advice concerning product development	Attorney Client	MPI In-House Legal Counsel		Privileged - Redact	GSUITE
121		[REDACTED]	[REDACTED]	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



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

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

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

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_00207881			2/27/2024	Document reflecting legal advice concerning product development and contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
197		Meta Platforms, Inc		2/13/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive

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

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
226	Meta_Kadrey_00207915			1/10/2023	Document reflecting legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel		Privileged - Withhold	OneDrive
227	Meta_Kadrey_00207919			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

Priv Log No.	Bates No.	Custodians	Author/From	Date	Privilege Description	Privilege Type	Legal Source	Filename	Withhold/Redact	Data Type
266		[REDACTED] [REDACTED] Meta Platforms, Inc	Author	2/16/2023	Document providing legal advice concerning copyright issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	OneDrive
267		[REDACTED] [REDACTED]; Meta Platforms, Inc	Author	2/16/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	OneDrive
268		[REDACTED] [REDACTED] Meta Platforms, Inc	Author	2/9/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	OneDrive
269		[REDACTED] [REDACTED] Meta Platforms, Inc	Author	2/28/2023	Document providing legal advice concerning contract issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	OneDrive
281		[REDACTED]	[REDACTED] [REDACTED]	4/23/2024	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
282		[REDACTED]	[REDACTED] [REDACTED]	7/24/2024	Document reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
301	Meta_Kadrey_00207901	[REDACTED]	[REDACTED]	2/23/2023	Document seeking and reflecting legal advice concerning copyright and contract issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	OneDrive

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

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

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Attorneys' Eyes Only

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	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
307		Meta Platforms, Inc		10/31/2024	Document seeking and reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE
333		[REDACTED]	[REDACTED]	2/17/2022	Document providing information for the purpose of facilitating legal advice concerning regulatory issues	Attorney Client	MPI In-House Legal Counsel	[REDACTED]	Privileged - Withhold	GSUITE



Priv Log No.	Bates No.	Beg Attach	Custodians	Author/From	To	CC	BCC	Legal Source	Date	Privilege Description	Privilege Type
1	Meta_Kadrey_00204207	Meta_Kadrey_00204207	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	2/16/2024	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client
2	Meta_Kadrey_00232034	Meta_Kadrey_00232034	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	2/16/2024	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client
3	Meta_Kadrey_00146516	Meta_Kadrey_00146516	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	5/30/2023	Chat reflecting legal advice concerning open source policy	Attorney Client
4	Meta_Kadrey_00146529	Meta_Kadrey_00146529	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	7/15/2023	Chat seeking legal advice concerning open source policy	Attorney Client
6	Meta_Kadrey_00218578	Meta_Kadrey_00218578	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	2/16/2024	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client
7	Meta_Kadrey_00081290	Meta_Kadrey_00081290	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	1/31/2023	Document reflecting legal advice concerning open source policy	Attorney Client
8	Meta_Kadrey_00088019	Meta_Kadrey_00088019	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	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_00078520	Meta_Kadrey_00078520	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	5/15/2024	Document seeking legal advice concerning open source policy	Attorney Client
10	Meta_Kadrey_00203384	Meta_Kadrey_00203384	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	4/29/2024	Spreadsheet reflecting legal advice concerning copyright issues	Attorney Client
11	Meta_Kadrey_00154876	Meta_Kadrey_00154876	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	2/15/2024	Document seeking legal advice concerning data privacy	Attorney Client
12	Meta_Kadrey_00078772	Meta_Kadrey_00078772	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	10/5/2023	Document reflecting legal advice concerning copyright issues	Attorney Client
13	Meta_Kadrey_00203748	Meta_Kadrey_00203748	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	8/18/2023	Document reflecting legal advice concerning contract issues	Attorney Client
14	Meta_Kadrey_00075742	Meta_Kadrey_00075742	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	2/29/2024	Document seeking legal advice concerning data privacy	Attorney Client
15	Meta_Kadrey_00075853	Meta_Kadrey_00075853	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	12/28/2023	Document reflecting legal advice concerning data privacy	Attorney Client
20	Meta_Kadrey_00078949	Meta_Kadrey_00078949	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	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
[REDACTED]	[REDACTED]	Privileged - Redact	WhatsApp	Standalone
[REDACTED]	[REDACTED]	Privileged - Redact	WhatsApp	Standalone
[REDACTED]	[REDACTED]	Privileged - Redact	WhatsApp	Standalone
[REDACTED]	[REDACTED]	Privileged - Redact	WhatsApp	Standalone
[REDACTED]	[REDACTED]	Privileged - Redact	WhatsApp	Standalone
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	StandAlone Document
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	StandAlone Document
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent

Priv Log No.	Bates No.	Beg Attach	Custodians	Author/From	To	CC	BCC	Legal Source	Date	Privilege Description	Privilege Type
22	Meta_Kadrey_00079085	Meta_Kadrey_00079085	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	4/14/2024	Email reflecting legal advice concerning regulatory issues	Attorney Client
25	Meta_Kadrey_00204118	Meta_Kadrey_00204115	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	5/22/2023	Document reflecting legal advice concerning open source policy	Attorney Client
26	Meta_Kadrey_00057383	Meta_Kadrey_00057383	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	12/13/2023	Document reflecting legal advice concerning open source policy	Attorney Client
27	Meta_Kadrey_00088492	Meta_Kadrey_00088492	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	5/23/2024	Document reflecting legal advice concerning copyright and data privacy issues	Attorney Client
29	Meta_Kadrey_00079277	Meta_Kadrey_00079277	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	3/14/2023	Document providing information for the purpose of facilitating legal advice concerning open source policy	Attorney Client
31	Meta_Kadrey_00081007	Meta_Kadrey_00081007	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	3/3/2023	Document seeking and reflecting legal advice concerning open source policy	Attorney Client
32	Meta_Kadrey_00064717	Meta_Kadrey_00064717	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	2/16/2023	Document seeking legal advice concerning data privacy	Attorney Client
33	Meta_Kadrey_00081010	Meta_Kadrey_00081010	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	1/12/2023	Document seeking and reflecting legal advice concerning copyright and data privacy issues	Attorney Client
34	Meta_Kadrey_00062355	Meta_Kadrey_00062355	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	5/9/2024	Document reflecting legal advice concerning product development	Attorney Client
35	Meta_Kadrey_00062774	Meta_Kadrey_00062774	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	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
[REDACTED]	[REDACTED]	Privileged - Redact	WP Chats	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	WP Chats	Attachment
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	StandAlone Document
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	StandAlone Document
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	StandAlone Document

Priv Log No.	Bates No.	Beg Attach	Custodians	Author/From	To	CC	BCC	Legal Source	Date	Privilege Description	Privilege Type
36	Meta_Kadrey_00088718	Meta_Kadrey_00088718	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	6/4/2024	Document seeking legal advice concerning copyright and data privacy issues	Attorney Client
37	Meta_Kadrey_00052619	Meta_Kadrey_00052619	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	2/6/2024	Document reflecting legal advice concerning regulatory and data privacy issues	Attorney Client
38	Meta_Kadrey_00096744	Meta_Kadrey_00096743	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	3/8/2024	Document seeking and reflecting legal advice concerning data privacy	Attorney Client
39	Meta_Kadrey_00096845	Meta_Kadrey_00096844	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	3/7/2024	Document seeking and reflecting legal advice concerning data privacy	Attorney Client
40	Meta_Kadrey_00097457	Meta_Kadrey_00097446	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	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_00098256	Meta_Kadrey_00098256	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	MPI In-House Legal Counsel	7/18/2024	Email reflecting legal advice concerning communications with third parties	Attorney Client
43	Meta_Kadrey_00099888	Meta_Kadrey_00099886	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	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_00099896	Meta_Kadrey_00099895	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	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_00100900	Meta_Kadrey_00100839	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	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
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	GSUITE	StandAlone Document
[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attachment
[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attachment
[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attachment
[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Parent
[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attached Parent
[REDACTED]	[REDACTED]	Privileged - Redact	EMAIL	Attached Parent
[REDACTED]	[REDACTED]	Privileged - Redact	WP Chats	Attachment

Priv Log No.	Bates No.	Beg Attach	Custodians	Author/From	To	CC	BCC	Legal Source	Date	Privilege Description	Privilege Type
56	Meta_Kadrey_00093954	Meta_Kadrey_00093954	[REDACTED]					MPI In-House Legal Counsel	2/24/2023	Chat reflecting legal advice concerning copyright, data privacy, and safety issues	Attorney Client
5	Meta_Kadrey_00146533	Meta_Kadrey_00146533	[REDACTED]					MPI In-House Legal Counsel	7/24/2023	Chat reflecting legal advice concerning copyright and contract issues	Attorney Client
24	Meta_Kadrey_00204117	Meta_Kadrey_00204115	[REDACTED]					MPI In-House Legal Counsel	5/22/2023	Image reflecting legal advice concerning open source policy	Attorney Client

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