

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA, SAN JOSE DIVISION

Forrest v. Meta Platforms, Inc.

No. 22-cv-03699-PCP (VKD) (N.D. Cal. Aug. 14, 2025) · No. 22-cv-03699-PCP (VKD) · Decided August 14, 2025

SUMMARY

The court addresses a discovery dispute in which plaintiff sought raw data and database schema from Meta Platforms, Inc. concerning tools and processes applied to allegedly fraudulent advertisements. The court ordered Meta to complete production of Scam Ad data, including mapping data, by August 28, 2025, and directed the parties to confer and submit a supplemental discovery letter if disputes remained.

CASE DETAILS

COURT	United States District Court for the Northern District of California, San Jose Division
WRITING FOR THE COURT	Virginia K. DeMarchi
JURISDICTION	United States District Court for the Northern District of California
DECIDED	August 14, 2025
DOCKET	22-cv-03699-PCP (VKD)
DISPOSITION	other
PROCEDURAL POSTURE	The parties submitted a joint discovery letter seeking resolution of a dispute over whether Meta was required to produce raw data and database schema relating to allegedly fraudulent advertisements.
PRECEDENTIAL VALUE	unpublished and nonprecedential interlocutory discovery order

TOPICS

- discovery dispute
- commercial litigation
- commercial
- civil procedure

PRACTICE AREAS

- civil procedure
- commercial litigation
- trademark litigation

QUESTIONS PRESENTED

1. Whether Meta's production of data and mapping information concerning the Scam Ads was sufficient to resolve the discovery dispute.
2. Whether Meta should also be required to produce the database schema for the relevant data sources.

HOLDINGS

1. Because Meta's production was not yet complete and the significance of the forthcoming mapping data had not yet been evaluated by Forrest's expert, the court declined to finally resolve the sufficiency dispute and ordered Meta to complete production of the relevant Scam Ad data, including mapping data, by August 28, 2025.
2. After Forrest's expert evaluated the production, the parties were required to confer further and, if disagreement remained, submit a supplemental joint discovery letter identifying the disputed areas and proposed resolutions.

KEY QUOTATIONS

“The Court is unable to finally resolve the parties’ disagreement about the sufficiency of Meta’s not-yet-completed production of data for each Scam Ad.” (at 2)

“After plaintiff’s expert has an opportunity to evaluate Meta’s data production, the parties must confer further regarding the sufficiency of the production.” (at 2)

FACTUAL BACKGROUND

Forrest sought raw data and database schema for relevant data sources so his expert could determine what tools or processes were applied to each Scam Ad and what those processes did between input and output. Meta represented that it had produced or was producing exported Hive data and mapping information showing the advertiser's ad input, selected tools, and creative optimizations. The court found that it could not yet determine whether the incomplete production was sufficient.

PROCEDURAL HISTORY

During discovery, Forrest requested data and database schema concerning the tools and processes applied to the advertisements at issue. Meta represented at the hearing that it had produced and was continuing to produce responsive Hive data and mapping information but disputed the need to produce the database schema. The court declined to finally resolve the sufficiency of the incomplete production and ordered Meta to complete production, after which the parties were required to confer and, if necessary, submit a supplemental discovery letter.

DISPOSITION

other

CASES CITED

- Ctr. for Auto Safety v. Chrysler Group, LLC, 809 F.3d 1092, 1098-99 (9th Cir.), cert. denied sub nom FCA U.S. LLC v. Ctr. for Auto Safety, 580 U.S. 815 (2016)
- Kamakana v. City & Cnty. of Honolulu, 447 F.3d 1172, 1179-80 (9th Cir. 2006)

OPINION

1 2 3 4 UNITED STATES DISTRICT COURT 5 NORTHERN DISTRICT OF CALIFORNIA 6
SAN JOSE DIVISION 7 8 ANDREW FORREST, Case No. 22-cv-03699-PCP (VKD) 9 Plaintiff,
ORDER RE AUGUST 1, 2025 10 v. DISCOVERY DISPUTE RE NATIVE DATA 11 META
PLATFORMS, INC., Re: Dkt. No. 241 Defendant. 12 13 14 The parties ask the Court to resolve a
dispute regarding Dr. Forrest's request that Meta 15 produce "raw data" and database schema for
all relevant data sources so that plaintiff's expert can 16 determine, for each Scam Ad at issue,
what tools or processes were applied to the ad, and what 17 those tools or processes did to the ad
between "input" and "output."1 Dkt.

No. 241. The Court 18 heard oral argument regarding this matter on August 12, 2025.2 Dkt. No.
252. 19 At the hearing, Meta represented that it has produced and is producing responsive data 20
21 1 Meta asks the Court to seal portions of the joint discovery brief, asserting that it contains non-
public details regarding the "design and mechanics of its data storage system" and the ad data 22
collected and stored in this system.

See Dkt. No. 249-1. As Meta's sealing motion relates to a discovery matter, the lower good cause
standard applies. Ctr. for Auto Safety v. Chrysler Group, 23 LLC, 809 F.3d 1092, 1098-99 (9th
Cir.), cert. denied sub nom FCA U.S. LLC v. Ctr. for Auto Safety, 580 U.S. 815 (2016); Kamakana
v. City & Cnty. of Honolulu, 447 F.3d 1172, 1179-80 (9th 24 Cir. 2006).

However, the Court has reviewed the information Meta seeks to seal and finds that, while the letter
does address these topics, the references to this information are at a very high level 25 of
generality and do not reveal sensitive, non-public information.

The Court does not find good cause to seal the material Meta has designated. Meta shall file an
unredacted version of the 26 discovery letter brief on the public docket no later than August 25,
2025. 27 2 In advance of the hearing, Meta filed an administrative motion asking the Court to
conduct the 1 exported from the Hive data warehouse, together with "mapping" information, that
will allow Dr. 2 || Forrest and his expert to understand and analyze, for each Scam Ad, the
advertiser's ad input, the 3 || tools selected by the advertiser, and the "creative optimizations"
applied to the ad.

Meta contends 4 || it should not be required to produce in addition the database schema for the
relevant data sources. 5 The Court is unable to finally resolve the parties' disagreement about the
sufficiency of 6 || Meta's not-yet-completed production of data for each Scam Ad.

In view of Meta's representations 7 regarding the significance of its forthcoming production of mapping data, the Court orders as 8 || follows: 9 1. By August 28, 2025, Meta must complete its production of Scam Ad data from the 10 || relevant data sources, including the mapping data. 11 2.

After plaintiff's expert has an opportunity to evaluate Meta's data production, the 12 || parties must confer further regarding the sufficiency of the production. If a dispute remains, the 13 || Court asks that the parties submit a supplemental joint discovery letter identifying the specific 14 areas of disagreement and their respective proposals for resolution.

The supplemental joint 15 discovery letter may include supporting declarations from each party's respective expert or a 16 || technical personnel. The supplemental joint discovery letter shall be filed by September 11, 3 17 2025, unless the parties agree to a different date. 18 IT IS SO ORDERED. 19 Dated: August 14, 2025 20 Virginf K. DeMarchi 22 United States Magistrate Judge 23 24 25 26 27 28