

**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

OPINION

Forrest v. Meta Platforms, Inc.

PER CURIAM.

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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 Virginfa K. DeMarchi 22 United States Magistrate Judge 23 24 25 26 27 28