

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

In re Meta Pixel Healthcare Litigation

Meta Pixel Healthcare Litigation · No. 22-cv-03580-WHO (VKD) · Decided July 21, 2025

SUMMARY

The United States District Court for the Northern District of California denied plaintiffs’ request to depose former Meta employee Dinkar Jain after the close of fact discovery. The court found that plaintiffs had not acted diligently and had not made the particularized showing required to establish that Jain possessed unique relevant knowledge warranting an additional deposition.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Virginia K. DeMarchi
JURISDICTION	United States District Court for the Northern District of California
DECIDED	July 21, 2025
DOCKET	22-cv-03580-WHO (VKD)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs sought an order allowing them to depose former Meta employee Dinkar Jain after the close of fact discovery and requiring Meta to reimburse Jain's counsel for travel expenses to India. The discovery dispute was referred to the magistrate judge for resolution.
STANDARD OF REVIEW	The court applied the relevance and proportionality requirements of Federal Rule of Civil Procedure 26(b), the limits and leave requirement for additional depositions under Rule 30(a)(2), and required a particularized showing of need for a deposition beyond the permitted limit.
PRECEDENTIAL VALUE	unpublished
PARTIES	Plaintiffs v. Meta

TOPICS

- discovery dispute
- civil procedure
- health law

PRACTICE AREAS

civil procedure

discovery

QUESTIONS PRESENTED

1. Whether plaintiffs should be permitted to take Dinkar Jain's deposition after the close of fact discovery.
2. Whether plaintiffs made the required particularized showing of need for an additional individual fact-witness deposition beyond the applicable limit.
3. Whether the court should require Meta to reimburse Jain's counsel for travel expenses to India to defend the deposition.

HOLDINGS

1. Plaintiffs were not entitled to take Jain's deposition after the fact-discovery deadline because they failed to show diligence in attempting to obtain the deposition during the discovery period or that Meta interfered with their ability to do so.
2. Plaintiffs failed to make the particularized showing of need required to obtain leave for Jain's deposition.

KEY QUOTATIONS

“Plaintiffs shall choose their remaining deponents wisely, as they will not be permitted to take more than 12 individual fact witness depositions absent a stipulation or leave of the court.” (at 2)

FACTUAL BACKGROUND

Meta identified Dinkar Jain in its initial disclosures in September 2022 and later identified him as a former employee in December 2024. Plaintiffs considered Jain a priority and potentially vital witness but did not seek an order compelling his deposition or leave to exceed the deposition limit before fact discovery closed. Plaintiffs asserted that Jain possessed unique knowledge of Meta's downstream systems and could address gaps caused by Meta's alleged failure to preserve evidence, but they did not describe that knowledge with meaningful specificity.

PROCEDURAL HISTORY

Plaintiffs identified Jain as a potential deponent during discovery but did not obtain his deposition before the May 30, 2025 fact-discovery deadline. Plaintiffs later filed a motion seeking relief, which was referred as a discovery dispute on July 1, 2025. The court denied the request to take Jain's deposition.

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 & County of Honolulu*, 447 F.3d 1172, 1179-80 (9th Cir. 2006)
- *Authentec, Inc. v. Atrua Techs., Inc.*, No. 08-cv-1423 PJH, 2008 WL 5120767, at *1 (N.D. Cal. Dec. 4, 2008)

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