

February 6, 2025

E-Filed

The Honorable Vince Chhabria
450 Golden Gate Avenue
17th Floor, Courtroom 4
San Francisco, CA 94102

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

Dear Judge Chhabria,

In light of the Court's February 4 order, Dkt. 416, Plaintiffs respectfully submit this supplemental letter regarding their Motion for Relief from Non-Dispositive Order of a Magistrate Judge, Dkt. 397.

As additional support for the non-exhaustive nature of Plaintiffs' *prima facie* crime-fraud showing, *see, e.g., Doe 3 v. Indyke*, No. 1:24-cv-01204-AS, Dkt. 278 (S.D.N.Y. Nov. 13, 2024) (ordering defendant to "produce *any* document that meets the [crime-fraud] parameters" after *in camera* review of "a fraction of the challenged documents") (emphasis added), Plaintiffs list in Appendix A seven additional potentially implicated Meta documents.¹ These documents contain redactions for attorney-client privilege and their contents appear to show similar attorney involvement in a crime, fraud, or unlawful conduct. *See Appendix A.* While it is practically impossible for Plaintiffs to identify all of the implicated Meta documents among the thousands of documents and communications that Meta has redacted and withheld entirely, Plaintiffs respectfully request that the Court also order Meta to submit the seven documents in Appendix A for *in camera* review, per Dkt. 416.

/s/ Maxwell V. Pritt
Maxwell V. Pritt
Boies Schiller Flexner LLP
Interim Lead Counsel for Plaintiffs

¹ Five redacted documents and two documents hyperlinked in one of them that appear to have been fully withheld.