

[Submitting Counsel on Signature Page]

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

*People of the State of California, et al. v. Meta
Platforms, Inc., et al.*

4:23-cv-05448-YGR

MDL No. 3047

Case Nos. 4:22-md-03047-YGR

**JOINT MOTION TO ENTER CONSENT
JUDGMENT**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Plaintiffs State of Arizona, *ex rel.* Kris Mayes, Attorney General; the People of the State of
2 California, by Rob Bonta, Attorney General; State of Colorado, *ex rel.* Philip J. Weiser, Attorney
3 General; State of Connecticut; State of Delaware, *ex rel.* Kathleen Jennings, Attorney General of the
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5 Attorney General Raúl R. Labrador; the People of the State of Illinois, by Kwame Raoul, Attorney
6 General; State of Indiana; State of Kansas, *ex rel.* Kris W. Kobach, Attorney General; the
7 Commonwealth of Kentucky, by Russell Coleman, Attorney General; State of Louisiana; State of
8 Maine; Office of the Attorney General of Maryland; State of Minnesota, by its Attorney General, Keith
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11 Division of Consumer Affairs; the People of the State of New York, by Letitia James, Attorney General
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18 Nicholas W. Brown, Attorney General; State of West Virginia, *ex rel.* John B. McCuskey, Attorney
19 General; and State of Wisconsin (collectively “Plaintiffs” or “State AGs”); together with Defendant
20 Meta Platforms, Inc., (“Meta”), respectfully request that the Court enter the proposed consent judgment
21 attached hereto as **Exhibit 1** (the “Consent Judgment”). Plaintiffs and Meta (together the “Parties”) have
22 agreed to resolve the claims alleged by Plaintiffs in this matter by entering into the Consent Judgment.

23 **I. Background**

24 On October 24, 2023, Plaintiffs filed a complaint in this action (the “Complaint”) against Meta
25 and related entities, alleging in relevant part that Meta used their technology and Social Media
26 Platforms, Facebook and Instagram, (“Social Media Platforms” or “Platforms”) to entice, engage, and
27 ultimately ensnare youth and teens. The Plaintiffs alleged that Meta has repeatedly misled the public
28

1 about the dangers of its Platforms and ignored the risks these Platforms have posed to the mental and
2 physical wellbeing of America’s youth, thereby engaging in deceptive and unlawful conduct in violation
3 of state unfair and deceptive acts and practices (“UDAP”) laws. Plaintiffs also alleged that Meta violated
4 the Children’s Online Privacy Protection Act (“COPPA”) by collecting, retaining, and using the data of
5 residents of their states who were under the age of thirteen. Meta disputed the Plaintiffs’ claims and
6 asserted that its actions were reasonable and lawful at all times. The Parties hereby agree to the Court’s
7 entry of the Consent Judgment as a complete resolution of the Plaintiffs’ Complaint against Meta.

8 **II. Legal Standard**

9 Approval of a proposed consent decree is within the discretion of the Court. *United States v.*
10 *Oregon*, 913 F.2d 576, 580–81 (9th Cir. 1990). A court should enter a consent judgment if it determines
11 that “it is fair, reasonable and equitable and does not violate the law or public policy.” *Sierra Club, Inc.*
12 *v. Elec. Controls Design, Inc.*, 909 F.2d 1350, 1355 (9th Cir. 1990); *see also Oregon*, 913 F.2d at 580–
13 81. The Court considers both the procedural and substantive fairness of a proposed consent judgment.
14 *United States v. Chevron U.S.A., Inc.*, 380 F.Supp.2d 1104, 1111 (N.D. Cal. 2005). If the consent
15 judgment “comes within the general scope of the case made by the pleadings, furthers the objectives
16 upon which the law is based, and does not violate the statute upon which the complaint was based, the
17 parties’ agreement may be entered by the court.” *Sierra Club*, 909 F.2d at 1355 (internal quotation
18 marks and citation omitted).

19 **III. Analysis**

20 Here, the process leading to the proposed Consent Judgment was procedurally fair. The Parties
21 are represented by experienced counsel and have litigated this matter for years, including through the
22 beginning of trial. The Parties thus have an in-depth understanding of the legal and factual issues in the
23 case. The proposed Consent Judgment is the product of difficult, good-faith, and arms-length
24 negotiations by experienced counsel. Under these circumstances, the Consent Judgment is procedurally
25 fair. *See, e.g., Oregon*, 913 F.2d at 581 (consent decree presumptively valid where court is satisfied it
26 was the product of arms-length negotiations).

Moreover, the proposed Consent Judgment, including the underlying settlement agreement incorporated into, and made a part of, the Consent Judgment, is substantively fair and reasonable. The Parties were engaged in complex settlement discussions for more than two years, involving lawyers and technical experts for all Parties. The Consent Judgment forms an integrated resolution to the violations alleged in Plaintiffs' Complaint and to secure a release of the Plaintiffs' claims. The relief provided is substantial, and it directly addresses the violations alleged by Plaintiffs. Entry of the proposed Consent Judgment would fully resolve the state-law and COPPA claims alleged by the Plaintiffs. The Consent Judgment includes significant injunctive relief that, among other things, requires: (1) default daily limits and nighttime blocks for teenage users of Meta's Social Media Platforms; (2) enhanced age assurance measures to prevent children from accessing the Platforms, or age-restricted content available on the Platforms; (3) establishment of additional tools to help parents and guardians to protect their children online; and (4) Meta to make payments to Plaintiffs as provided therein. The Consent Judgment also provides for consideration to Meta including, among other things, a release of claims, as described in greater detail in the Consent Judgment and attached settlement agreement. For all of these reasons, the proposed Consent Judgment is substantively fair and reasonable.

IV. Conclusion

For all of the reasons stated above, the Parties jointly submit that there is no just reason to delay entry of the Consent Judgment, and therefore respectfully request that the Court enter the Consent Judgment as a final judgment under Rules 54 and 58 of the Federal Rules of Civil Procedure.

Dated: August 26, 2026

Respectfully submitted,

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SIGNATURE CERTIFICATION

Under Civ. L.R. 5-1(i)(1), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: August 26, 2026

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