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**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

**COMMISSIONERS: Lina M. Khan, Chair
Rebecca Kelly Slaughter
Alvaro M. Bedoya**

In the Matter of

**FACEBOOK, Inc.,
a corporation**

Respondent.

Docket No. C-4365

**UNOPPOSED MOTION OF RESPONDENT FOR EXTENSION OF TIME TO ANSWER
ORDER TO SHOW CAUSE**

Respondent Facebook, Inc. (n/k/a Meta Platforms Inc.) (“Meta”) hereby moves pursuant to 16 C.F.R. § 4.3(b) for a sixty-day extension of time, through August 1, 2023, to file its answer to the Order to Show Cause issued by the Commission in the above-referenced matter on May 3, 2023 (the “OTSC”). Complaint Counsel has indicated that they do not oppose Meta’s request for a sixty-day extension.

Respondent respectfully submits that there is good cause for its requested extension.

Additional time, beyond Rule 3.72(b)(1)’s thirty-day period, is warranted given the nature of the proceeding and the extensive volume of years-old material the OTSC cites and relies upon. The OTSC’s factual allegations are culled from a much larger record, including

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seven depositions, hundreds of pages of narrative responses, and nearly 30,000 pages of underlying source material, most of which was produced well over a year ago. It would be unfair and prejudicial to require Meta to review the OTSC’s factual allegations, and the broader factual record on these issues, and respond in just 30 days. This is particularly true given the “unusual” nature of the OTSC,¹ which raises significant factual and legal issues warranting additional time.

Nor would there be any prejudice from the requested extension. The Commission has noted that the OTSC marks only the “beginning of a proceeding,”² which concerns factual allegations that, at this point, are many years old. Now that the Commission has issued its OTSC, the nature of the proceeding and the relief sought warrant a modest extension of the thirty-day period set forth in Rule 3.72(b)(1).

WHEREFORE, for good cause shown, Meta respectfully requests that the Commission grant the requested relief pursuant to 16 C.F.R. § 4.3(b).³

¹ Federal Trade Commission, *Frequently Asked Questions about the Proposed Changes to the 2020 Privacy Order with Meta/Facebook*, available at https://www.ftc.gov/system/files/ftc_gov/pdf/FB-FAQ.pdf.

² Press Release, *FTC Proposes Blanket Prohibition Preventing Facebook from Monetizing Youth Data* (Federal Trade Commission May 3, 2023), available at <https://www.ftc.gov/news-events/news/press-releases/2023/05/ftc-proposes-blanket-prohibition-preventing-facebook-monetizing-youth-data>.

³ Meta continues to review the OTSC and, in making this Motion, hereby reserves all rights and preserves all claims and defenses.

PUBLIC

DAVIS POLK & WARDWELL LLP

/s/ James P. Rouhandeh

James P. Rouhandeh

Michael Scheinkman

James W. Haldin

450 Lexington Avenue

New York, NY 10017

(212) 450-4000

james.rouhandeh@davispolk.com

michael.scheinkman@davispolk.com

james.haldin@davispolk.com

Counsel for Respondent Meta Platforms, Inc.

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[PROPOSED] ORDER

Having considered Respondent's Unopposed Motion for Extension of Time to Answer Order to Show Cause, filed on May 10, 2023, it is hereby ORDERED that Respondent's answer to the Order to Show Cause filed on May 3, 2023 shall be due on August 1, 2023.

By the Commission.

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CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2023, I caused a true and correct copy of the foregoing Unopposed Motion of Respondent for Extension of Time to Answer Order to Show Cause to be filed and served as follows:

One electronic copy via the Administrative E-Filing System and one electronic courtesy copy to the Office of the Secretary via email to ElectronicFilings@ftc.gov.

One electronic courtesy copy to the Office of the Administrative Law Judge via email to OALJ@ftc.gov.

One electronic copy via email to Complaint Counsel:

Reenah L. Kim (rkim1@ftc.gov)
Federal Trade Commission
600 Pennsylvania Ave., NW, CC-6316
Washington, DC 20580

Olivia Jerjian (ojerjian@ftc.gov)
Federal Trade Commission
600 Pennsylvania Ave., NW, CC-6316
Washington, DC 20580

Hong Park (hpark@ftc.gov)
Federal Trade Commission
600 Pennsylvania Ave., NW, CC-6316
Washington, DC 20580

/s/ James P. Rouhandeh
James P. Rouhandeh

*Counsel for Respondent Meta
Platforms, Inc.*