

In the Matter Of:

AMY NEVILLE vs SNAP INC.

22STCV33500

MOTION

October 18, 2023



SUPERIOR COURT FOR THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT SSC 7

HON. LAWRENCE P. RIFF, JUDGE

AMY NEVILLE; ET AL.,

PLAINTIFFS,

VS.

SNAP INC.,

DEFENDANT.

ORIGINAL

) SUPERIOR COURT
) NO. 22STCV33500

) 22STCV36189
) 22STCV36229
) 23SMCV00061
) 23SMCV00835
) 23SMCV01428
) 23STCV08062

AND RELATED CASES.

REPORTER'S TRANSCRIPT OF PROCEEDINGS

WEDNESDAY, OCTOBER 18, 2023

APPEARANCES:

FOR THE PLAINTIFF:

SOCIAL MEDIA VICTIMS LAW CENTER
BY: MATTHEW BERGMAN
BY: GLENN S. DRAPER
BY: LAURA MARQUEZ-GARRETT
600 1ST AVE., #102
SEATTLE, WA 98104

C.A. GOLDBERG, PLLC
BY: CARRIE GOLDBERG
16 COURT STREET, 13TH FLR.
BROOKLYN, NY 11201

FOR THE DEFENDANT:

SHOOK HARDY BACON
BY: JESSICA L. GRANT
555 MISSION STREET., #2300
SAN FRANCISCO, CA 94105

GAIL PEEPLES, CSR NO. 11458
PRO TEMPORE OFFICIAL REPORTER

1 APPEARANCES, CONT:

2 FOR THE DEFENDANT: MORRISON & FOERSTER
3 BY: J. ALEXANDER LAWRENCE
4 425 MARKET STREET
5 SAN FRANCISCO, CA 94105

6 (APPEARANCES VIA LA COURTCONNECT):

7 FOR PLAINTIFFS: SOCIAL MEDIA VICTIMS LAW CENTER
8 BY: MADELINE BASHA
9 BY: SYDNEY LOTTES
10 600 1ST AVE., #102
11 SEATTLE, WA 98104

12 FOR DEFENDANT: MORRISON & FOERSTER:
13 BY: LINDSEY CAIN
14 BY: JUSTIN REZKALLA
15 BY: ERNESTO ROJAS GUZMAN
16 BY: MARCUS GRIMES
17 425 MARKET STREET
18 SAN FRANCISCO, CA 94105

19
20
21
22
23
24
25
26
27
28

M A S T E R I N D E X

SESSIONS

WEDNESDAY, OCTOBER 18, 2023

PAGE

A.M. SESSION

4

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 CASE NUMBER: 22STCV33500
2 CASE NAME: NEVILLE V. SNAP; ET AL.
3 LOS ANGELES, CALIFORNIA WEDNESDAY, OCTOBER 18, 2023
4 DEPARTMENT SSC 7 HON. LAWRENCE P. RIFF,
5 JUDGE
6 REPORTER: GAIL PEEPLES, CSR NO. 11458
7 TIME: 11:00 A.M.
8 APPEARANCES: (AS PREVIOUSLY NOTED.)
9

10 THE COURT: GOOD MORNING, ALL. I'M JUDGE LAWRENCE
11 RIFF. WELCOME TO DEPARTMENT 7.

12 WE HAVE ON CALENDAR THIS MORNING A
13 COLLECTION OF RELATED CASES: MATTERS 6, 7, 8, 9, 10, 11,
14 AND 12. I'M GOING TO CALL ALL OF THEM AT ONCE BY THEIR
15 SHORTENED TITLE.

16 AMY NEVILLE VERSUS SNAP, INC., AMANDA
17 EUBANKS, AS SUCESSOR-IN-INTEREST, VERSUS SNAP, INC., ROY
18 PLUNK VERSUS SNAP, INC., JENNIFER STABILE, S-T-A-B-I-L-E,
19 VERSUS SNAP, INC., DIANA TRUJILLO VERSUS SNAP, INC.,
20 RHONDA BURRIS VERSUS SNAP, INC., AND KATHERINE BREWER
21 VERSUS SNAP, INC.

22 WE HAVE A REPORTER.

23 SO, LET ME GET APPEARANCES OF COUNSEL
24 STARTING WITH PLAINTIFFS' SIDE AND LAWYERS IN THE ROOM.

25 LET ME MAKE A SUGGESTION ACTUALLY. SINCE
26 IT'S VERY HARD TO HEAR IN HERE AND THERE ARE NUMEROUS
27 PEOPLE PERHAPS PARTICIPATING ON OUR COURTCONNECT, REMAIN
28 SEATED WHEN YOU ADDRESS THE COURT. NO PROBLEM WITH THAT.

1 USE THE MICROPHONES. THEY MOVE EASILY THERE IS A LITTLE
2 GREEN BUTTON. MAKE SURE THAT -- WELL, THERE'S A LITTLE
3 GREEN LIGHT. MAKE SURE THAT IT IS ON. AND WE'LL GO FROM
4 THERE.

5 SO, COUNSEL.

6 MR. BERGMAN: MAY IT PLEASE THE COURT, MATTHEW
7 BERGMAN APPEARING ON BEHALF OF THE PLAINTIFFS.

8 THE COURT: THANK YOU.

9 MR. DRAPER: GLENN DRAPER ALSO APPEARING ON BEHALF
10 OF THE PLAINTIFFS.

11 MS. MARQUEZ-GARRETT: LAURA MARQUEZ-GARRETT
12 APPEARING ON BEHALF OF PLAINTIFFS.

13 MS. GOLDBERG: CARRIE GOLDBERG APPEARING FOR
14 PLAINTIFFS. GOOD MORNING.

15 THE COURT: THANK YOU.

16 I KNOW IT'S AWKWARD. THANK YOU FOR THAT.
17 ANYBODY APPEARING ON LA COURTCONNECT FOR
18 PLAINTIFFS? ANY COUNSEL WISH TO MAKE AN APPEARANCE?

19 MS. BASHA: THIS IS MADELINE BASHA APPEARING FOR
20 THE PLAINTIFFS.

21 THE COURT: THANK YOU.

22 MS. LOTTES: AND SYDNEY LOTTES FOR PLAINTIFFS.

23 THE COURT: GOT IT.

24 ANYBODY ELSE?

25 HEARING NONE.

26 OKAY. LET'S GO TO THE DEFENSE SIDE OF THE
27 ROOM. STARTING WITH COUNSEL HERE IN COURT, YOUR
28 APPEARANCE PLEASE.

1 MS. GRANT: THANK YOU, YOUR HONOR. GOOD MORNING.
2 JESSICA GRANT ON BEHALF OF SNAP.

3 THE COURT: THANK YOU.

4 MR. LAWRENCE: YES. GOOD MORNING, YOUR HONOR.
5 ALEX LAWRENCE ALSO ON BEHALF OF SNAP, INC.

6 THE COURT: HOLD ON. I DON'T HAVE YOU --

7 MR. LAWRENCE: I'M JOSEPH ALEXANDER LAWRENCE. I
8 JUST GO BY ALEX. APOLOGIES, YOUR HONOR.

9 THE COURT: THAT'S ALL RIGHT. AROUND HERE YOU
10 WILL BE MR. LAWRENCE.

11 MR. LAWRENCE: THANK YOU, YOUR HONOR.

12 THE COURT: WE'RE NOT ON FIRST NAME BASIS WHEN
13 WE'RE ON THE RECORD.

14 OKAY, MR. LAWRENCE. THANK YOU.

15 AND WHO ELSE IS APPEARING ON LA COURT
16 CONNECT FOR THE DEFENDANT PLEASE?

17 MS. CANE: YOUR HONOR, THERE ARE SEVERAL OTHER
18 FOLKS FROM MORRISON & FOERSTER ON BEHALF OF SNAP WHO WILL
19 BE OBSERVING ONLY WHO ARE ON COURTCONNECT. AND THAT IS
20 MYSELF, LYNDSLEY CAIN. AND I'M JOINED BY JUSTIN REZKALLA,
21 ERNESTO ROJAS GUZMAN, AND MARCUS GRIMES.

22 THE COURT: ALL RIGHT. THANK YOU, MISS CANE.

23 AND YOU AND YOURS WHO ARE APPEARING ON
24 COURTCONNECT IF YOU DO END UP HAVING SOMETHING TO SAY,
25 SIMPLY IDENTIFY WHO YOU ARE AND SAY IT.

26 LIKEWISE FOR PLAINTIFFS' SIDE, IF YOU HAVE
27 SOMETHING TO SAY, SPEAK UP AND JUST TELL US WHO YOU ARE.

28 ALL RIGHT. SO, FOLKS, I HAVE SOME

1 PRELIMINARY COMMENTS. AND THIS MAY TAKE A WHILE. OKAY?

2 AND EVEN BEFORE I GET TO MY PRELIMINARY
3 COMMENTS, LET ME COMMENT ON JUST HOW I SEE OUR DAY
4 UNFOLDING. OKAY.

5 YOU'RE LIKELY TO BE HERE FOR MOST OF THE
6 DAY. WE ARE GOING TO HOLD OUR PROCEEDINGS UNTIL NOON.
7 WE'RE OBLIGATED TO CLOSE THE COURTROOM BETWEEN NOON AND
8 1:30. WE'LL GET STARTED AGAIN AT 1:45 AND GO PROBABLY TO
9 ABOUT 4:15.

10 I ALLOW FOR THE POSSIBILITY, AND MAYBE THE
11 PROBABILITY, THAT THE HEARING -- HEARINGS WE ARE HAVING
12 TODAY WILL NOT BE COMPLETED TODAY BECAUSE WE HAVE A LOT
13 TO DO ON CALENDAR. IN ADDITION TO A VARIETY OF MOTIONS,
14 WE HAVE STATUS CONFERENCES IN ALL OF THESE CASES. AND WE
15 NEED TO HAVE THOUGHTFUL AND MEANINGFUL CONVERSATION ABOUT
16 ALL OF THAT.

17 SO, A LITTLE BIT LATER IN THE DAY WE WILL
18 PROBABLY BE TALKING ABOUT FURTHER DATES NOT TOO FAR OFF
19 BY THE WAY.

20 I HAVE TEN ITEMS OF PRELIMINARY COMMENTS.
21 THESE CASES BEFORE THE COURT ASK SOME VERY
22 PROFOUND AND VERY PENETRATING QUESTIONS CONCERNING THE
23 NORMS AND THE LAW THAT APPLIES AND WILL APPLY TO OUR 2023
24 WORLD OF INTERCONNECTEDNESS, THE ELECTRONIC
25 INTERCONNECTEDNESS IN WHICH OUR SOCIETY NOW OPERATES.

26 NOW, WHAT I JUST SAID IS A PRETTY ABSTRACT
27 STATEMENT, IS IT NOT?

28 AND I WANT TO OBSERVE THAT BIG PICTURE

1 ABSTRACTS ASIDE, WE DO NOT LOSE SIGHT OF -- I DON'T LOSE
2 SIGHT OF THE FACT, AND I THINK NO ONE HERE DOES, THAT
3 THESE CASES INVOLVE FOR SOME DOZENS OF FAMILIES A
4 TERRIBLE LOSS: A LOSS OF A CHILD OR INJURIES TO A CHILD
5 FROM THE TERRIBLE SCOURGE OF A DRUG OVERDOSE.

6 IT'S APPARENT TO ME, FROM READING LOTS OF
7 THE PAPERS SUPPLIED TO THE COURT TODAY, THAT THE PARTIES
8 HAVE VAST DISAGREEMENTS AS TO WHAT THE TRUE FACTS ARE,
9 WHAT THE LAW IS, AND HOW THE LAW SHOULD OPERATE. BUT, IT
10 IS ALSO CLEAR TO ME THAT THE PARTIES ARE NOT SEPARATED AS
11 TO THE PROPOSITION THAT THESE FAMILIES HAVE SUFFERED A
12 TERRIBLE LOSS.

13 WE ARE AT THE BEGINNING STAGES OF THESE
14 LOSSES. AND GIVEN THE COMMUNITY INTEREST IN THESE CASES,
15 I THINK IT'S VERY IMPORTANT THAT WE UNDERSTAND AND THAT I
16 EXPLAIN FOR THOSE MEMBERS OF THE PUBLIC WHO ARE HERE
17 TODAY WHO ARE NOT TRAINED IN THE LAW WHAT WE ARE DOING
18 TODAY AND WHAT WE ARE NOT DOING TODAY.

19 I WANT EVERYBODY TO UNDERSTAND THAT THE
20 ARCHITECTURE BENEATH ANY LEGAL PROCEEDING, ANY LAWSUIT
21 LIKE THIS, ARE PROCEDURAL RULES, PROCESS.

22 WE ALL STUDIED THE CONSTITUTION SOMEWHERE
23 ALONG THE LINE IN OUR EDUCATION, AND WORDS LIKE "DUE
24 PROCESS OF LAW" WERE PUT BEFORE US. PART OF THE U.S.
25 CONSTITUTION, PART OF THE CONSTITUTION OF THE STATE OF
26 CALIFORNIA, PARTIES ARE ENTITLED TO DUE PROCESS OF LAW.
27 THAT APPLIES IN THESE CIVIL CASES AS WELL.

28 SO, ONE OF THE THINGS I NEED TO BE WORRYING

1 ABOUT WITH COUNSEL ARE THE PROCEDURES AND PROCESSES OF
2 LAW THAT WILL APPLY.

3 THE PRINCIPAL MATTER BEFORE US TODAY IS A
4 PROCEDURAL MATTER THAT OCCURS AT THE FRONT END OF THE
5 LAWSUIT. THE PLAINTIFFS IN THE CASE, THROUGH THEIR
6 LAWYERS -- THE PLAINTIFFS IN THESE CASES, THROUGH THEIR
7 LAWYERS, HAVE MADE A COLLECTION OF FACTUAL ALLEGATIONS.
8 THEY HAVE DONE SO IN THE FORM OF A DOCUMENT CALLED A
9 COMPLAINT. THE COMPLAINT IS FILED IN COURT, AND IT'S
10 THERE FOR EVERYBODY TO READ. TECHNICALLY, AT LEAST IN
11 THE NEVILLE --

12 LET ME FIND OUT FROM COUNSEL HOW DO I
13 PRONOUNCE --

14 MR. BERMAN: NEVILLE.

15 THE COURT: IN THE NEVILLE CASE, WHICH IS THE CASE
16 IN WHICH SOME OF THE PROCEDURAL ISSUES ARISES TODAY,
17 TECHNICALLY IT'S A SECOND AMENDED COMPLAINT, MEANING THAT
18 THE PLAINTIFFS' SIDE, WITH THE COURT'S PERMISSION, HAVE
19 AMENDED THE SETS OF -- THE SET OF ALLEGATIONS.

20 AND SNAP, THE DEFENDANT IN THE CASE, HAS
21 RAISED A COLLECTION OF LEGAL ARGUMENTS BY FILING
22 SOMETHING CALLED A DEMURRER, D-E-M-U-R-R-E-R. DEMURRER.

23 AND I WANT TO EXPLAIN TO YOU ALL, BRIEFLY,
24 WHAT ALL THAT MEANS TO ME. I'LL TRY TO DECIPHER IT FOR
25 THOSE WHO AREN'T LAWYERS.

26 THE CHALLENGE THAT SNAP HAS RAISED -- I
27 WILL PARAPHRASE. THIS IS ME TALKING, NOT SNAP.

28 BASICALLY WHAT THE DEMURRER SAYS IS EVEN IF

1 ALL OF THE ALLEGATIONS IN THIS COMPLAINT ARE TRUE -- AND
2 I DON'T KNOW, BUT I ASSUME -- IN FACT, I DO KNOW THAT
3 SNAP DENIES A GREAT MANY, IF NOT ALL, OF THE ALLEGATIONS
4 OF THIS COMPLAINT. BUT, FOR PURPOSES OF THEIR LEGAL
5 CHALLENGE, OF ITS LEGAL CHALLENGE, SNAP IS SAYING EVEN IF
6 EVERYTHING IN THIS COMPLAINT WERE TRUE, THE PLAINTIFFS
7 ARE NOT ENTITLED TO THE LEGAL RELIEF THAT THEY SEEK IN
8 THIS LAWSUIT.

9 AND IN THIS LAWSUIT AMONG THE THINGS THAT
10 THE PLAINTIFFS ARE SEEKING ARE MONEY DAMAGES AND CERTAIN
11 INJUNCTIVE RELIEF, AS WELL CERTAIN COURT ORDERS TO
12 REQUIRE CERTAIN THINGS ARE -- PRECLUDE CERTAIN THINGS.

13 SO, WHAT I NEED EVERYBODY TO UNDERSTAND
14 HERE TODAY IS WE ARE NOT GOING TO BE DEBATING WHETHER THE
15 ALLEGATIONS ARE TRUE OR NOT TRUE. THERE WILL COME A TIME
16 IN THIS CASE WHEN THOSE DEBATES HAPPEN. THAT'S CALLED A
17 TRIAL. ALL RIGHT.

18 AND A TRIAL OCCURS -- SOUNDS TO ME LIKE IF
19 THERE EVER IS A TRIAL IN ANY OF THESE CASES, AND WE WILL
20 SEE, THAT ONE OR MORE OF THE PARTIES MAY WANT A JURY,
21 THEY WILL SIT OVER THERE IN THE JURY BOX, THEY WILL HEAR
22 COMPETING BITS OF EVIDENCE ON FACTUAL MATTERS, AND THEY
23 WILL DECIDE WHAT'S TRUE OR WHAT'S NOT TRUE. OR AT LEAST
24 WHAT IS MORE LIKELY THAN NOT TRUE.

25 WE'RE NOT DOING THAT TODAY.

26 BY AND LARGE, FOR PURPOSES OF THE DEMURRER
27 BEFORE US TODAY, I AM OBLIGATED TO ASSUME EVERYTHING THAT
28 THE PLAINTIFFS HAVE ALLEGED IN THE COMPLAINT, EVERYTHING,

1 IS TRUE. AND THEN THE QUESTION IS, WELL, DOES THE LAW
2 PROVIDE A REMEDY EVEN IF EVERYTHING IS TRUE?

3 THAT'S WHAT A DEMURRER IS. OKAY?

4 I'M ON 3 OF MY 10, COUNSEL.

5 NEXT TOPIC FOR PRELIMINARY COMMENT.

6 I WANT TO OBSERVE THAT WE HAVE A
7 VOCABULARIZATION ISSUE, COUNSEL, AMONG US. AND WE'RE
8 GOING TO HAVE TO DECIDE SOME COMMON LANGUAGE TO DESCRIBE
9 WHAT WE'RE TALKING ABOUT IN THE CASE.

10 SO, FOR EXAMPLE, I AM CALLED UPON BY THE
11 DEMURRER CHALLENGE TO DECIDE IF THE FACTS ALLEGED, IF
12 TRUE, STATE OR CONSTITUTE A CAUSE OF ACTION. A CAUSE OF
13 ACTION. THAT IS A DEFINED TERM OF ART UNDER CALIFORNIA
14 LAW. AND AS THE LAWYERS IN THE ROOM KNOW, IT'S A
15 PROBLEMATIC -- IT'S A PROBLEMATIC TERM BECAUSE FREQUENTLY
16 LAWYERS AND JUDGES USE THE TERM "CAUSE OF ACTION" AND "A
17 COUNT" AND "A THEORY OF RELIEF", LEGAL THEORY,
18 INTERCHANGEABLY EVEN THOUGH THEY ARE VERY SEPARATE
19 THINGS. SO, I NOTE THAT.

20 WE ALSO HAVE A VOCABULARY PROBLEM WITH THE
21 TERM "PRODUCTS LIABILITY." PRODUCTS LIABILITY. AND I
22 WANT TO SHARE WITH YOU WHAT I THINK THOSE WORDS MEAN.

23 "PRODUCTS LIABILITY" REFER TO THE VARIOUS
24 LEGAL THEORIES THAT WILL PERMIT A REMEDY FOR A DEFECTIVE
25 PRODUCT. IT INCLUDES STRICT PRODUCT LIABILITY, IT
26 INCLUDES NEGLIGENCE, IT MAY EVEN INCLUDE CERTAIN
27 INTENTIONAL TORTS. BUT, I THINK THE PAPERS HERE MAY USE
28 THE TERM "PRODUCTS LIABILITY" WHEN THEY MEAN STRICT

1 LIABILITY IN TORT, WHICH ARE DIFFERENT THINGS.

2 "STRICT LIABILITY IN TORTS" MEANS TO ME
3 THOSE COLLECTIONS OF LEGAL THEORIES, GENERALLY, THAT DO
4 NOT REQUIRE A SHOWING OF NEGLIGENCE OR PRIVITY OF
5 CONTRACT AND HAVE A REDUCED BURDEN OF PROOF UPON THE
6 PLAINTIFF WHICH RELATE -- WHICH LEGAL THEORIES RELATE TO
7 PRODUCTS.

8 SO, AS WE GO FORWARD, WE'RE GOING TO HAVE
9 TO MAKE SURE WE ARE COMMUNICATING ON THESE VARIOUS WORDS.

10 NEXT COMMENT.

11 AND BELIEVE IT OR NOT, IT IS NOT MY GOAL
12 HERE TO BE GIVING A LECTURE IN CIVIL PROCEDURE. BUT, I
13 THINK, SO THAT YOU ALL KNOW WHAT I AM DOING, YOU NEED TO
14 UNDERSTAND WHAT I AM THINKING ABOUT.

15 I TOLD YOU THIS IS A DEMURRER HEARING
16 PRINCIPALLY WHERE SNAP SAYS EVEN IF EVERYTHING IS TRUE
17 THE PLAINTIFFS DO NOT HAVE A LEGAL REMEDY AND, THEREFORE,
18 THE PLAINTIFFS LOSE. I MEAN, THAT'S -- THE OUTCOME OF A
19 DEMURRER IS THE PLAINTIFFS LOSE AND THE LAWSUIT IS OVER,
20 IT'S DISMISSED IF THE DEMURRER IS VALID.

21 NOW, I WILL DROP A FOOTNOTE TO SAY THAT
22 ALMOST ALWAYS IF THE COURT IS GOING TO GRANT A DEMURRER
23 THE PLAINTIFFS ARE GIVEN A FURTHER OPPORTUNITY TO SEEK
24 TO -- TO AMEND THE COMPLAINT TO SOLVE THE PROBLEM IF IT'S
25 SOLVABLE. BUT, IF IT'S A PURE LEGAL PROBLEM, IT PROBABLY
26 CAN'T BE SOLVED.

27 MY POINT IS THAT'S HOW A DEMURRER IS
28 RESOLVED. IT'S EITHER SUSTAINED, MEANING GRANTED, OR

1 IT'S OVERRULED, MEANING DENIED. IF IT'S OVERRULED, MEANS
2 WE GO TO THE NEXT STAGE OF THE LITIGATION. BUT, THE
3 CASES ROLL FORWARD.

4 MANY OF THE ISSUES RAISED BY SNAP IN THEIR
5 DEMURRER CAUSE ME TO QUESTION WHAT IS THE PROPER STAGE OF
6 THIS LITIGATION FOR THESE ISSUES TO BE CONFRONTED AND
7 DECIDED. MAYBE IT'S ON DEMURRER, WHICH IS RIGHT NOW.
8 MAYBE IT'S NOT. MAYBE THE CORRECT PROCEDURAL -- LET ME
9 SAY THAT DIFFERENTLY.

10 MAYBE THE BETTER WAY FOR SOME OR ALL OF
11 THESE ISSUES TO BE DECIDED IS ON AN ACTUAL FACTUAL RECORD
12 WHERE THE COURT GETS SOME INKLING OF WHAT -- WELL, OF
13 WHETHER THE FACTS ARE TRUE OR NOT TRUE, WHICH MEANS THAT
14 THE COURT RECEIVES EVIDENCE FROM WITNESSES AND DOCUMENTS.
15 AND THE COURT GETS, AS I SAY, AN INKLING OF WHAT'S TRUE
16 AND NOT TRUE.

17 AND I TELL YOU ALL THAT THERE IS ANOTHER
18 STAGE OF LITIGATION THAT OFTEN COMES UP WHERE ONE SIDE OR
19 THE OTHER WILL SAY TO THE JUDGE "LOOK, JUDGE, HERE ARE
20 THE FACTS, HERE ARE -- HERE'S THE EVIDENCE, A BIG STACK
21 OF DECLARATIONS AND EVIDENCE, THESE ARE THE FACTS OF THIS
22 CASE AND THERE IS NO DISPUTE AS TO WHAT THE FACTS ARE.
23 BOTH SIDES AGREE THESE ARE ALL THE FACTS; AND FACTS A
24 THROUGH J, THOSE ARE THE FACTS. NOW, JUDGE, APPLY THE
25 LAW TO THOSE FACTS AND TELL US WHO IS -- WHO WINS."

26 WE DON'T NEED A TRIAL AT THAT POINT BECAUSE
27 TRIALS ARE TO FIGURE OUT WHAT THE FACTS ARE.

28 WAS THE LIGHT RED OR WAS IT GREEN IN THE

1 TRAFFIC ACCIDENT CASE? IF EVERYBODY AGREES THE LIGHT WAS
2 GREEN, WE DO NOT NEED A TRIAL TO FIGURE OUT WHAT COLOR
3 THE LIGHT WAS.

4 SO, THIS THING I'M TALKING ABOUT IS CALLED
5 SUMMARY JUDGMENT. AND A PARTY WILL SAY, AS I JUST -- I'M
6 GOING TO REPEAT MYSELF.

7 A PARTY SAYS "LOOK, HERE ARE THE FACTS,
8 JUDGE, BOTH SIDES AGREE THESE ARE THE FACTS, HERE'S THE
9 LAW; IF YOU APPLY THE LAW TO THESE FACTS, WE WIN."

10 THAT'S CALLED SUMMARY JUDGMENT.

11 WHAT THE OTHER SIDE FREQUENTLY DOES IN THAT
12 SITUATION IS SAY "WELL, THOSE AREN'T -- WE DON'T AGREE
13 THAT THOSE ARE THE FACTS. IN FACT, HERE ARE A BUNCH --
14 HERE'S A BUNCH OF EVIDENCE, JUDGE, THAT SHOWS THAT THOSE
15 FACTS ARE DISPUTED. AND BECAUSE THEY'RE DISPUTED, YEAH,
16 WE NEED A TRIAL. WE DON'T AGREE WHETHER THE LIGHT WAS
17 GREEN OR RED, WE NEED A TRIAL."

18 OR THE PARTY WILL SAY "WELL, OKAY, WE AGREE
19 THAT THOSE ARE THE FACTS; BUT WE SAY WHEN YOU APPLY THE
20 LAW WE WIN, NOT THE OTHER SIDE."

21 SO, IT MAY BE THAT SOME OF THE ISSUES HERE
22 TODAY ARE TO BE DECIDED NOT ON A DEMURRER BUT LATER AT A
23 SUMMARY JUDGMENT.

24 AND THEN ANOTHER ALTERNATIVE IS THAT IN
25 FACT THEY NEED TO BE DECIDED AT TRIAL BY A JURY OR A
26 JUDGE WHO SITS AS A FACTFINDER WHO DECIDES WHETHER THE
27 LIGHT WAS GREEN OR RED; WHETHER THE FACTFINDER, IF IT'S A
28 JURY, DECIDES DO THEY BELIEVE THE WITNESS, DO THEY NOT

1 BELIEVE THE WITNESS. THAT SORT OF THING.

2 OKAY. SO, THAT IS ON MY MIND: ARE THE
3 ISSUES RAISED BY THESE PAPERS TODAY APPROPRIATE FOR A
4 DEMURRER?

5 NEXT -- AND THIS IS WHERE WE GET INTO OUR
6 VOCABULARY CONUNDRUM.

7 THE SECOND AMENDED COMPLAINT, THE OPERATIVE
8 COMPLAINT IN NEVILLE, IS 216 PAGES LONG. I DON'T RECALL
9 HOW MANY PARAGRAPHS THERE ARE, BUT IT IS SOMEWHERE IN THE
10 800, 900 --

11 MR. DRAPER: JUST SHY OF A THOUSAND.

12 THE COURT: IT'S A VERY LONG COMPLAINT, IT'S VERY
13 DETAILED WITH RESPECT TO ITS ALLEGATIONS. AND I HAVE
14 READ IT SEVERAL TIMES.

15 AND IN THAT SECOND AMENDED COMPLAINT --
16 WHICH FROM NOW ON I'M JUST GOING TO CALL THE COMPLAINT
17 AND EVERYBODY WILL KNOW I'M REFERRING TO THE OPERATIVE
18 SECOND AMENDED COMPLAINT -- THE PLAINTIFFS' SIDE SETS OUT
19 16 -- AND NOW I DON'T KNOW WHAT WORD TO USE -- 16 LEGAL
20 THEORIES, COUNTS, CAUSES OF ACTION. I'M NOT SURE WHAT
21 WORD TO USE. AND THIS IS WHY IT MATTERS.

22 TECHNICALLY, PLAINTIFF'S COUNSEL REFER TO
23 THESE 16 THINGS AS COUNTS. AND -- AGAIN, THESE ARE
24 PRELIMINARY COMMENTS. BUT, IT IS MY UNDERSTANDING -- 42
25 YEARS INTO THIS BUSINESS -- THAT, BASICALLY, COUNTS
26 REPRESENT ALTERNATIVE LEGAL THEORIES BENEATH A CAUSE OF
27 ACTION. THAT'S HOW I UNDERSTAND THOSE WORDS UNDER
28 CALIFORNIA PROCEDURE.

1 SO, LET'S JUST GO OVER THE COUNTS ASSERTED.
2 AND I WANT TO JUST TELL YOU, COUNSEL,
3 BRIEFLY HOW I'M INTERPRETING THEM. ALL RIGHT.

4 COUNT 1 IS DENOMINATED: STRICT PRODUCTS
5 LIABILITY DESIGN DEFECT.

6 NOW, WHERE I COME FROM, WHICH IS
7 TECHNICALLY OHIO BUT I HAVE BEEN IN CALIFORNIA FOR MANY
8 DECADES, STRICT PRODUCTS LIABILITY ON A DESIGN DEFECT HAS
9 TWO PRONGS. IT HAS A RISK/BENEFIT PRONG UNDER BARKER
10 VERSUS LULL AND IT HAS A CONSUMER EXPECTATION PRONG.

11 I INFER FROM THE WORDS IN COUNT 1 THAT IT
12 IS A CONSUMER EXPECTATION THEORY BEING ASSERTED.

13 COUNT 2 IS A STRICT PRODUCTS LIABILITY
14 THEORY DENOMINATED FAILURE TO WARN.

15 AND I COMPLETELY UNDERSTAND THAT. THAT IS
16 A VIABLE THEORY IN CALIFORNIA.

17 COUNT 3 IS DENOMINATED RISK BENEFIT TEST.

18 I INFER FROM THAT THAT THAT IS A STRICT
19 PRODUCTS LIABILITY THEORY ON THE OTHER PRONG FROM COUNT
20 1. SO, THAT IS THE BARKER VERSUS LULL THEORY, AND COUNT
21 1 IS THE CONSUMER EXPECTATION THEORY.

22 OKAY. NOW, COUNTS 4, 5, 6, 7, AND 13 ALL
23 ARE DENOMINATED AS A SPECIES OF NEGLIGENCE.

24 COUNT 4 IS DENOMINATED NEGLIGENCE DEFECTIVE
25 DESIGN. COUNT 5 NEGLIGENCE FAILURE TO WARN. COUNT 6 IS
26 JUST CALLED NEGLIGENCE. COUNT 7 IS CALLED NEGLIGENCE PER
27 SE. AND COUNT 13 IS NEGLIGENT MISREPRESENTATION.

28 I JUST WANT TO OBSERVE AT LEAST A INTUITIVE

1 FEELING THAT I HAVE THAT THOSE ARE ALL SPECIES OF THE
2 SAME LEGAL THEORY, WHICH IS NEGLIGENCE.

3 YOU MIGHT WONDER "WELL, WHAT DIFFERENCE
4 DOES IT MAKE?"

5 AND THE REASON IT MAY MAKE A DIFFERENCE IN
6 THE FUTURE IS BECAUSE ONE SIDE OR THE OTHER MAY BE
7 SEEKING SUMMARY ADJUDICATION UNDER CCP 437(C), AND ABSENT
8 A STIPULATION OF THE PARTIES, A PARTY MAY NOT SEEK
9 SUMMARY ADJUDICATION OF LESS THAN A CAUSE OF ACTION. SO,
10 IT'S NOT CLEAR TO ME, JUST HYPOTHETICALLY, THAT A PARTY
11 COULD MOVE FOR SUMMARY ADJUDICATION ON NEGLIGENT FAILURE
12 TO WARN, COUNT 5, BY ITSELF. I'M GOING TO LEAVE IT AT
13 THAT.

14 COUNT 8 IS DENOMINATED TORTIOUS
15 INTERFERENCE WITH PARENTAL RIGHTS. AND IT IS NOT CLEAR
16 TO ME WHETHER THAT IS AN ASSERTION OF VIRGINIA LAW OR NOT
17 AND WHETHER THE PLAINTIFFS ARE ASKING THIS COURT TO APPLY
18 VIRGINIA LAW IN THIS CALIFORNIA PROCEEDING. I GUESS WE
19 WILL FIND OUT IN DUE COURSE.

20 COUNT 9 IS PUBLIC NUISANCE. I UNDERSTAND
21 WHAT THOSE WORDS MEAN.

22 COUNT 10 IS DENOMINATED AIDING AND
23 ABETTING. AND MY INTUITIVE UNDERSTANDING OF THOSE WORDS
24 IS THAT IS NOT A LEGAL THEORY OR A CAUSE OF ACTION, IT IS
25 A LEGAL PROPOSITION TO EXTEND VICARIOUS LIABILITY.

26 COUNT 11 IS DENOMINATED FRAUDULENT
27 CONCEALMENT AND MISREPRESENTATION. TO ME, THAT IS A
28 SPECIES OF -- IT IS A SPECIFICATION UNDER A HEADING OF

1 FRAUD. BOTH CONCEALMENT AND MISREPRESENTATIONS ARE WAYS
2 IN WHICH A FRAUD CAN OCCUR.

3 COUNT 12 IS DENOMINATED FRAUDULENT
4 MISREPRESENTATION. AND I DON'T UNDERSTAND HOW THAT'S
5 DIFFERENT THAN COUNT 11.

6 COUNT 13 IS NEGLIGENT MISREPRESENTATION,
7 WHICH, AGAIN, I THINK IS A SPECIES OF NEGLIGENCE.

8 COUNT 14 IS DENOMINATED WRONGFUL DEATH.
9 AND I UNDERSTAND WHAT THOSE WORDS MEAN. CALIFORNIA DOES
10 PROVIDE A LEGAL REMEDY FOR SPECIFIED RELATIONS TO A
11 DECEDENT TO RECOVER FOR A WRONGFUL DEATH.

12 COUNT 15 IS DENOMINATED SURVIVAL ACTION.
13 AND I UNDERSTAND WHAT THOSE WORDS MEAN. UNDER CERTAIN
14 CIRCUMSTANCES, A PERSON WHO SUFFERS FROM A TORTIOUS WRONG
15 FROM ANOTHER PERSON BUT THE PERSON DIES BEFORE HE OR SHE
16 IS ABLE TO BRING A LAWSUIT, IN CERTAIN CIRCUMSTANCES THE
17 CLAIM OF WRONG SURVIVES THE DEATH.

18 AND THEN COUNT 16 IS LOSS OF CONSORTIUM AND
19 SOCIETY. AND I WILL NEED SOME CLARIFICATION TO WHAT THAT
20 REFERS.

21 THOSE ARE ELEMENTS OF DAMAGES AS I
22 UNDERSTAND IT.

23 OKAY. NEXT, ONCE WE'RE DONE TALKING ABOUT
24 DEMURRERS, THERE ARE OTHER THINGS ON THE CALENDAR FOR
25 TODAY.

26 SNAP HAS BROUGHT A MOTION FOR SANCTIONS,
27 MEANING PUNISHMENT, DIRECTED TO THE PLAINTIFFS UNDER CODE
28 OF CIVIL PROCEDURE SECTION 128.7. AND THE THEORY IS THAT

1 PLAINTIFFS AND THEIR LAWYERS HAVE KNOWINGLY MADE FALSE
2 ALLEGATIONS FOR WHICH THERE SHOULD BE LEGAL CONSEQUENCE
3 AND PUNISHMENT.

4 THERE IS A MOTION TO SEAL A PORTION OF A
5 DECLARATION FROM A SNAP WITNESS, A WITNESS NIKESH,
6 N-I-K-E-S-H, SRIVASTAVA, S-R-I-V-A-S-T-A-V-A. AND THERE
7 ARE SPECIAL RULES, I WILL JUST ADVISE, AS TO WHEN
8 DOCUMENTS CAN BE SEALED, MEANING THEY'RE NOT AVAILABLE TO
9 THE PUBLIC. SO, WE WILL HOLD A HEARING ON THAT.

10 AND LAST -- WELL, SECOND TO LAST ON THE
11 CALENDAR TODAY, THERE IS A MOTION BROUGHT BY THE
12 PLAINTIFFS' SIDE TO STRIKE, WHICH IS A LEGAL CONCEPT OF
13 FIGURATIVELY MARKING OUT WITH A PEN CERTAIN PORTIONS OF
14 SNAP'S DEMURRER PAPERS SO THAT THEY WOULD BE CONSIDERED
15 THAT THEY DON'T EXIST. THUS, THE MATERIAL THAT IS
16 STRICKEN. THAT'S THE REQUEST THAT CERTAIN THINGS BE
17 STRICKEN.

18 AND THEN LAST WE HAVE STATUS CONFERENCES IN
19 ALL OF OUR CASES. OKAY.

20 NOW, COUNSEL, YOU'LL HAVE TO TAKE MY WORD
21 FOR IT THAT I HAVE PREPARED FOR YOUR HEARING TODAY. I
22 HAVE READ EVERYTHING. I HAVE A TOP-NOTCH RESEARCH
23 ATTORNEY WHO HAS ALSO READ EVERYTHING. WE HAVE
24 CONFERRED.

25 AND I TOLD YOU I DON'T HAVE TENTATIVE
26 RULINGS TO SHARE WITH YOU, BUT THAT DOESN'T MEAN I DON'T
27 HAVE TENTATIVE RULINGS.

28 BUT, I'M NOT GOING TO TELL YOU WHAT MY

1 TENTATIVE RULINGS ARE BECAUSE I DON'T HAVE NOR -- WELL,
2 I'LL JUST SPEAK FOR MYSELF -- I DON'T HAVE CONFIDENCE YET
3 THAT I UNDERSTAND THE CASE OR THE LAW TO BE APPLIED WELL
4 ENOUGH TO TELL YOU MY TENTATIVE RULINGS.

5 SO, WHAT I PLAN TO DO IS, AS I TOLD YOU
6 YESTERDAY WHEN I POSTED IT ON OUR CASE BULLETIN BOARD,
7 I'M GOING TO TURN THE FLOOR OVER TO YOU ALL.

8 I'M GOING TO GIVE THE PLAINTIFFS' SIDE UP
9 TO AN HOUR TO ARGUE THE DEMURRER. IT MAY NOT BE YOU NEED
10 ANYWHERE CLOSE TO THAT, BUT YOU MAY HAVE UP TO THAT. AND
11 I WOULD LIKE YOU TO RESERVE WHATEVER TIME YOU'RE GOING TO
12 RESERVE FROM YOUR HOUR AT THE FRONT END SO WE KNOW --

13 ACTUALLY, I'M GOING TO DO IT THE OTHER WAY
14 AROUND. AND THE REASON FOR THAT IS THE MOVING PARTY IS
15 THE DEFENSE. SO, I APOLOGIZE.

16 OF COURSE, DEFENSE, YOU GO FIRST BECAUSE
17 YOU'RE THE MOVING PARTY. YOU MAY HAVE UP TO AN HOUR.
18 AND I WANT YOU TO RESERVE YOUR REBUTTAL TIME.

19 AS I SAID, WE HAVE TO STOP AT NOON. BUT,
20 WE CAN PICK UP WHEREVER WE ARE.

21 AND, PLAINTIFF, YOU WILL HAVE UP TO AN HOUR
22 TO SAY WHAT YOU ARE GOING TO SAY. REBUTTAL.

23 AND I JUST WANT YOU TO KNOW IT IS ALMOST A
24 CERTAINTY I WILL BE TAKING THE DEMURRER UNDER SUBMISSION,
25 I'M NOT LIKELY TO RULE FROM THE BENCH. OKAY?

26 THEN WE WILL MOVE ON TO OTHER MATTERS.

27 BEFORE I GO ANY FURTHER, LET ME TURN THE
28 FLOOR OVER BRIEFLY TO PLAINTIFFS' COUNSEL.

1 ANY COMMENT OR QUESTION AS TO WHAT WE HAVE
2 DONE SO FAR THIS MORNING?

3 MR. BERGMAN: NO, YOUR HONOR.

4 THE COURT: ALL RIGHT.

5 DEFENSE?

6 MS. GRANT: NO, YOUR HONOR.

7 THE COURT: OKAY. ARE YOU PREPARED TO PROCEED?

8 MS. GRANT: I AM, YOUR HONOR.

9 THE COURT: DO YOU WANT TO DO IT FROM THE PODIUM,
10 OR WOULD YOU LIKE TO DO IT FROM RIGHT WHERE YOU ARE?

11 MS. GRANT: WHAT WOULD YOU PREFER?

12 THE COURT: I'M INDIFFERENT AS LONG AS I CAN HEAR
13 YOU.

14 MS. GRANT: I'M HAPPY TO DO IT FROM THE PODIUM.

15 THE COURT: OKAY. ALL RIGHT.

16 FOR THOSE OF YOU IN THE GALLERY, I KNOW
17 COUNSEL APOLOGIZES FOR TURNING HER BACK ON YOU. BUT,
18 THAT'S WHERE THE PODIUM IS, AND IT CAN'T BE MOVED. IT IS
19 BOLTED TO THE FLOOR.

20 ALL RIGHT, COUNSEL, WHENEVER YOU ARE
21 READY.

22 MS. GRANT: YES. THANK YOU, YOUR HONOR.

23 AGAIN, JESSICA GRANT ON BEHALF OF SNAP,
24 INC. I WILL RESERVE 20 MINUTES FOR REBUTTAL.

25 AND WHAT I WAS PLANNING TO DO, YOUR HONOR,
26 AND IF IT'S OKAY WITH YOU, I WAS JUST GOING TO TAKE MAYBE
27 10 MINUTES OF MY 40 TO JUST KIND OF LAY -- GIVE AN
28 OVERVIEW SORT OF TO HOPEFULLY HELP YOU UNDERSTAND A

1 LITTLE BIT MORE ABOUT OUR ARGUMENTS, AND THEN MAYBE THE
2 NEXT 30 MINUTES ARE JUST IF YOU HAVE ANY QUESTIONS OR
3 THERE IS OTHER ISSUES YOU REALLY WANT TO DRILL DOWN INTO
4 OR EXPLORE WE COULD USE THE REMAINING 30 MINUTES FOR
5 THOSE QUESTIONS.

6 THE COURT: OKAY. I WILL NOT BE BASHFUL ASKING
7 ANYTHING THAT COMES TO MIND.

8 MS. GRANT: AND OBVIOUSLY THE QUESTIONS THAT YOU
9 HAVE ARE THE MOST IMPORTANT THING. I WANT TO BE SURE
10 THAT WHEN I LEAVE THE COURTROOM TODAY I HOPEFULLY WILL
11 HAVE ANSWERED ALL OF THE QUESTIONS THAT YOU HAVE BECAUSE
12 THAT'S, I THINK, WHY WE'RE HERE.

13 THE COURT: OKAY. WELL, LET ME JUST SAY THIS UP
14 FRONT.

15 OBVIOUSLY, SECTION 230 IS HUGE. AND WE
16 NEED TO UNDERSTAND THE METES AND BOUNDS OF THAT AND HOW
17 IT APPLIES TO THESE ALLEGATIONS, WHICH I'M OBLIGATED TO
18 ACCEPT AS TRUE.

19 AND I KNOW YOU KNOW THIS AND PROBABLY ARE
20 ABOUT TO TELL ME THIS. WHILE I AM OBLIGATED TO ACCEPT
21 FACTUAL ALLEGATIONS AS TRUE, I AM NOT OBLIGATED TO ACCEPT
22 CONCLUSIONS OF LAW ASSERTED AS TRUE. AND I KNOW THAT.

23 AND I KNOW THE DIFFERENCE BETWEEN A FACTUAL
24 ASSERTION AND A CONCLUSION OF LAW. BUT, PERHAPS THAT'S
25 SOMETHING YOU WANT TO TELL ME MORE ABOUT.

26 THE OTHER THING I WANT TO SAY, THE OTHER
27 MAJOR ISSUE AS I SEE IT ON THE DEMURRER, IS THE QUESTION
28 OF WHETHER CALIFORNIA'S LAW OF STRICT PRODUCT LIABILITY,

1 STRICT PRODUCT LIABILITY, DO OR DO NOT APPLY TO THIS
2 COLLECTION OF FACTS.

3 AND I WANT TO SAY AT THE FRONT END THAT
4 WHILE RELEVANT, I'M NOT CONVINCED THAT THE HISTORIC TESTS
5 OF TANGIBILITY OF A PRODUCT -- YOU KNOW, IT'S A CHAINSAW,
6 I CAN TOUCH IT. HERE IT IS. I CAN HOLD IT UP. IT HAS
7 MASKS, OCCUPIES THREE DIMENSIONS IN OUR UNIVERSE.

8 I'M NOT CONVINCED THE TANGIBILITY IS A
9 CATEGORICAL REQUIREMENT.

10 AND I DO WANT TO SAY THIS. THESE CASES I
11 THINK -- HOW DO I SAY THIS?

12 YOU KNOW, THE LAW OF STRICT PRODUCTS
13 LIABILITY, MISS GRANT, AS I KNOW YOU KNOW, AROSE FROM
14 WHAT THE LAW THROUGH PEOPLE LIKE JUSTICE TRAYNOR DECIDED
15 WERE THE INADEQUACIES OF NEGLIGENCE AND WARRANTY LAW TO
16 ADDRESS A NEW KIND OF SOCIETY IN WHICH PRODUCTS WERE MASS
17 PRODUCED AND MASS MARKETED.

18 AND THE QUESTION -- A QUESTION POSED BY THE
19 CALIFORNIA SUPREME COURT AND ANSWERED BY THE CALIFORNIA
20 SUPREME COURT WAS HOW ARE LOSSES ASSOCIATED WITH THIS NEW
21 FORM OF COMMERCE GOING TO BE BORNE IN OUR SOCIETY?

22 AND I WANT YOU TO KNOW THAT I AM ASKING THE
23 SAME QUESTION IN 2023 ABOUT OUR NEW WORLD OF SOCIAL
24 MEDIA: IS STRICT PRODUCTS LIABILITY APPROPRIATE?

25 I GUESS THAT'S THE RIGHT WAY TO ASK THE
26 QUESTION.

27 AND I WILL BE VERY INTERESTED IN YOU
28 TELLING ME IF YOU THINK THERE IS BINDING CALIFORNIA COURT

1 OF APPEAL OR SUPREME COURT AUTHORITY THAT ANSWERS THAT
2 QUESTION FOR ME TODAY OR IS IT AN OPEN QUESTION.

3 WITH THAT, PLEASE, PROCEED.

4 I'M NOT DEEMING YOU TO HAVE STARTED UNTIL
5 RIGHT NOW.

6 MS. GRANT: SURE.

7 AND WHAT I THINK -- I DO WANT TO ADDRESS
8 YOUR HONOR'S QUESTION. AND I WILL TODAY. BUT, WITH THE
9 15 MINUTES THAT WE HAVE BEFORE LUNCH, I JUST WANT TO GIVE
10 THE OVERVIEW, AND THEN I WANT TO MORE SPECIFICALLY.

11 AND I ACTUALLY -- OVER THE LUNCH BREAK, I
12 ACTUALLY WANT TO THINK AND ANSWER YOUR QUESTION AS
13 ADEQUATELY AND AS FULLY AS I CAN BECAUSE -- BUT, THE ONE
14 THING I WILL SAY IS I THINK SECTION 230 IMMUNIZES
15 INTERNET PROVIDERS LIKE SNAP FROM ANY CLAIM, WHETHER IT'S
16 STRICT PRODUCTS LIABILITY, WHETHER IT'S NEGLIGENCE, ANY
17 PUBLIC NUISANCE, ET CETERA. SO, I THINK THAT IS WHY I
18 WANT TO START WITH SECTION 230 AND THEN MOVE OVER TO WHY
19 PLAINTIFFS' CLAIMS, HOWEVER THEY ARE ALLEGED -- PRODUCTS
20 LIABILITY, NEGLIGENCE, ET CETERA -- FAIL AS A MATTER OF
21 LAW IF YOU DETERMINE THAT SECTION 230 DOESN'T APPLY.

22 AND YOU STARTED YOUR COMMENTS, AND I WANT
23 TO ECHO THEM, YOUR HONOR, BY SOMETHING THAT I THINK NEEDS
24 TO BE ACKNOWLEDGED IN THIS COURTROOM, WHICH IS THAT WE
25 ALL FEEL EMPATHY FOR THE PLAINTIFFS AND THEIR LOSSES.
26 THIS CASE IS NO DOUBT TRAGIC. AND, SO, YES, WE ARE ALL
27 IN AGREEMENT ON THAT. AND I WANTED TO ACKNOWLEDGE THAT,
28 YOUR HONOR.

1 I THINK WE CAN ALL AGREE AS WELL THAT THE
2 DRUG DEALERS WHO SOLD COUNTERFEIT PILLS THAT WERE
3 SURREPTITIOUSLY LACED WITH A LETHAL DOSE OF FENTANYL
4 SHOULD ALSO BE HELD ACCOUNTABLE.

5 BUT, PLAINTIFFS HAVE NOT AND, INDEED,
6 CANNOT ASSERT ANY LEGAL THEORY UNDER WHICH SNAP WOULD BE
7 LIABLE FOR THE CRIMINAL ACTIONS OF THIRD PARTIES WHO
8 ABUSE SNAPCHAT OR ANY OTHER MEANS OF COMMUNICATION TO
9 SELL DEADLY COUNTERFEIT DRUGS.

10 AND AS NOTED IN OUR DEMURRER, WE HAVE PUT
11 FORTH WHY PLAINTIFFS' CLAIMS FAIL FOR TWO INDEPENDENT
12 REASON. ONE IS SECTION 230 OF THE CDA, AND THE SECOND IS
13 THEY FAIL TO STATE A CLAIM.

14 SO, BEFORE I GET INTO THE MERITS OF THAT, I
15 DID WANT TO TAKE A STEP BACK BECAUSE YOU RAISED THE ISSUE
16 ABOUT THE PROFOUND QUESTIONS AND THE NORMS AND THE LAW
17 THAT APPLIES IN OUR 2023 WORLD OF ELECTRONIC
18 INTERCONNECTEDNESS. AND I THINK IN PASSING THE CDA
19 CONGRESS ACTUALLY CONSIDERED THOSE VERY SAME QUESTIONS
20 AND NORMS --

21 THE COURT: ALBEIT IN 1996 --

22 MS. GRANT: RIGHT. BUT, STILL, WE WERE STILL
23 ONLINE.

24 AND A LOT OF THINGS THAT THE TECHNOLOGY
25 TODAY -- SNAP IS A MESSAGE COMMUNICATION PLATFORM SENDING
26 MESSAGES BACK AND FORTH. DO THE SAME THING ON ZOOM AND
27 OTHER THINGS.

28 AND CONGRESS RECOGNIZED THAT ONLINE

1 PLATFORMS CANNOT CONTROL THE ACTIONS OF THIRD PARTIES AND
2 SHOULD NOT BE EXPECTED TO PRESCREEN AND SENSOR ALL
3 PRIVATE MESSAGES THAT USERS ARE EXCHANGING WITH ONE
4 ANOTHER. AND THAT'S WHY IT PASSED CDA, TO IMMUNIZE ISP'S
5 FROM CLAIMS LIKE THOSE PRESENTED HERE THAT ARISE FROM
6 THIRD-PARTY CONTENT. AND I THINK WE CAN'T LOSE SIGHT OF
7 THAT.

8 THE CONTENT HERE WAS CREATED BY THE DRUG
9 DEALERS AND THE DECEDENTS, WHO WERE SEEKING TO BUY DRUGS.
10 SNAP, ITS ONLY ROLE WAS AN INTERMEDIARY FOR THE EXCHANGE
11 OF THOSE TWO MESSAGES.

12 SO, QUITE FRANKLY, IF THOSE SAME
13 COMMUNICATIONS HAD HAPPENED VIA TEXT, VIA EMAIL, ON THE
14 PHONE -- WHICH OF COURSE PHONE CALLS ARE EPHEMERAL, THERE
15 IS NO RECORDS OF THOSE PHONE CALLS AFTER THEY EXIST --
16 WOULD ATT BE LIABLE FOR THAT DRUG DEAL?

17 NO. OF COURSE NOT.

18 AND, YET, THAT'S EXACTLY WHAT THE
19 PLAINTIFFS ARE TRYING TO DO HERE, IS HOLD SNAP
20 ACCOUNTABLE FOR THE FACT THAT SOMETIMES CRIMINALS DO
21 ABUSE THE PHONE OR SOMETIMES THEY USE OTHER MEANS TO SELL
22 DRUGS.

23 SO, I THINK THE NINTH CIRCUIT IN DOE VERSUS
24 INTERNET BRANDS SAID IT PRETTY WELL, WHICH WAS:

25 THE POLICY OF SECTION 230 IS TO AVOID
26 "IMPOSITION OF TORT LIABILITY UPON COMPANIES THAT DO NOT
27 CREATE POTENTIALLY HARMFUL MESSAGES BUT ARE SIMPLY
28 INTERMEDIARIES FOR THEIR DELIVERY."

1 AND I THINK IT'S EQUALLY IMPORTANT TO
2 REMEMBER THAT THE CALIFORNIA SUPREME COURT TWICE IN
3 MURPHY AND HASSELL HAVE HELD THAT SECTION 230 IS "TO BE
4 CONSTRUED BROADLY IN FAVOR OF IMMUNITY."

5 SO, EVEN THOUGH --

6 THE COURT: CAN I JUST INQUIRE ABOUT THAT?

7 MS. GRANT: SURE.

8 THE COURT: PLAINTIFFS HAVE CITED AUTHORITY TO THE
9 CONTRARY, THAT IMMUNITY IS TO BE CONSTRUED NARROWLY. I
10 THINK. THAT'S MY RECOLLECTION FROM THE PAPERS.

11 DO YOU RECALL SEEING THAT?

12 MS. GRANT: I DO RECALL SEEING THAT.

13 THE COURT: ARE THEY WRONG?

14 MS. GRANT: THAT IS WRONG BECAUSE THAT'S EXACTLY
15 CONTRARY TO THE CALIFORNIA SUPREME COURT'S HOLDING IN
16 MURPHY, WHICH IT WAS RELYING ON ANOTHER SUPREME COURT
17 CASE, BARRETT VERSUS ROSENTHAL. SO, THEIR ARGUMENT
18 TRYING TO PUSH YOU TO ADOPT A NARROW INTERPRETATION OF
19 SECTION 230 IS COMPLETELY CONTRARY TO CALIFORNIA LAW.

20 AND THE OTHER THING, YOUR HONOR, IS EVEN
21 THOUGH WE'RE IN 2023, THERE IS LOTS OF WAYS THAT WE CAN
22 COMMUNICATE WITH ONE ANOTHER ELECTRONICALLY, THE ISSUES
23 THAT YOU FACE RULING ON THIS DEMURRER ARE NOT NEW, AND
24 THIS IS NOT AN ISSUE OF FIRST IMPRESSION.

25 AND, AGAIN, ALTHOUGH WE ALL FEEL EMPATHY
26 FOR THE LOSSES THAT PLAINTIFFS HAVE SUFFERED, THE LEGAL
27 THEORY -- OR THE THEORIES THAT ARE BEING PUT BEFORE YOU
28 HAVE BEEN TRIED MANY TIMES BEFORE BY OTHER PLAINTIFFS

1 DEALING WITH EQUALLY TRAGIC SITUATIONS.

2 SO, JUST TO GIVE YOU AN OVERVIEW OF THOSE,
3 WE HAVE SEX CRIMES. IN DOE 2 VERSUS MYSPACE, WHICH IS
4 BINDING AUTHORITY, THE CALIFORNIA COURT OF APPEAL HELD
5 THAT CLAIMS THAT MYSPACE SHOULD HAVE BEEN SURE THAT
6 SEXUAL PREDATORS DO NOT GAIN ACCESS TO OR COMMUNICATE
7 WITH MINORS IS EXPRESSLY BARRED BY SECTION 230.

8 TERRORISM. IN GONZALES THE NINTH CIRCUIT
9 HELD THAT GOOGLE'S NEUTRAL COMMUNICATIONS TOOL THAT
10 PROMOTED TERRORIST CONTENT DID NOT MAKE GOOGLE LIABLE FOR
11 TERRORISM EVEN THOUGH GOOGLE FAILED TO PREVENT ISIS FROM
12 USING ITS PLATFORM.

13 IN TAAMNEH THE UNITED STATES SUPREME COURT
14 HELD THAT ONLINE PLATFORMS' ALGORITHMS DO NOT SUBJECT
15 THEM TO LIABILITY FOR BAD ACTORS LIKE ISIS WHO USE THE
16 PLATFORM FOR ILLEGAL ENDS.

17 YOU MAY RECALL, YOUR HONOR, A MASS SHOOTING
18 OCCURRED NOT TOO LONG AGO -- IT WAS HORRIFIC -- IN SOUTH
19 CAROLINA, THE WHITE SUPREMACIST WHO CAME INTO THE
20 PREDOMINANTLY AFRICAN AMERICAN CHURCH AND JUST MURDERED
21 ALL THESE PEOPLE.

22 THE PLAINTIFF IN THAT CASE IS THE DAUGHTER
23 OF THE MINISTER WHO WAS GUNNED DOWN. AND SHE ALLEGED
24 THAT FACEBOOK'S DESIGN, ARCHITECTURE, AND ALGORITHMS
25 ALLEGEDLY MAXIMIZED ENGAGEMENT WITH WHITE SUPREMACIST
26 CONTENT.

27 AND THE COURT HELD THAT ALL OF PLAINTIFF'S
28 CLAIMS WERE BARRED BY SECTION 230; IT GRANTED FACEBOOK'S

1 MOTION TO DISMISS NOTING THAT COURTS CONSISTENTLY
2 INTERPRETED SECTION 230 TO BAR CLAIMS SEEKING TO HOLD
3 INTERNET SERVICE PROVIDERS LIABLE FOR THE CONTENT THAT
4 WAS EXCHANGED AND POSTED. AND THE COURT SAID SOMETHING
5 THERE THAT PERHAPS WILL RESONATE, YOUR HONOR. THEY SAID:

6 "THE BALANCING OF THE BROAD SOCIETAL
7 BENEFITS OF A ROBUST INTERNET AGAINST THE SOCIAL HARM
8 ASSOCIATED WITH BAD ACTORS UTILIZING THESE SERVICES IS
9 QUINTESSENTIALLY THE FUNCTION OF CONGRESS NOT THE
10 COURTS."

11 I THINK THAT GOES TO YOUR QUESTION WHEN YOU
12 WERE POSING ABOUT STRICT PRODUCTS LIABILITY, YOU KNOW,
13 WHO BEARS THE COSTS. AND I THINK CONGRESS HAS ALREADY
14 MADE THAT DETERMINATION IN TERMS OF SECTION 230.

15 AND, THEN, THE LAST SORT OF AREA WHERE
16 THERE'S BEEN TRAGIC CONSEQUENCES IS DRUG CRIMES LIKE WE
17 HAVE HERE.

18 AND I THINK, YOUR HONOR, DIEROFF IS
19 SQUARELY ON POINT. THERE, A YOUNG PERSON USED A WEBSITE
20 THAT ENABLED ANONYMOUS MESSAGING THROUGH FORUMS WITH
21 TOPIC NAMES LIKE "I LOVE HEROIN"; AND HE POSTED A MESSAGE
22 "WHERE CAN I SCORE HEROIN," AND HE RECEIVED A RESPONSE
23 FROM A DRUG DEALER FROM WHOM HE PURCHASED WHAT HE THOUGHT
24 WAS HEROIN BUT UNFORTUNATELY IT WAS LACED WITH A LETHAL
25 DOSE OF FENTANYL AND HE DIED.

26 AND THE NINTH CIRCUIT ACKNOWLEDGED THE
27 FACTS WERE NO DOUBT TRAGIC BUT AFFIRMED DISMISSAL AT THE
28 PLEADING STAGE ON SECTION 230 GROUNDS.

1 AND, IMPORTANTLY, CALIFORNIA COURTS HAVE
2 FOLLOWED THE NINTH CIRCUIT'S SECTION 230 JURISPRUDENCE.

3 SO, IN PRAGER UNIVERSITY VERSUS GOOGLE,
4 AGAIN THE COURT OF APPEALS -- IT'S BINDING AUTHORITY --
5 SUSTAINED THE DEMURRER WITHOUT LEAVE TO AMEND ON SECTION
6 230 GROUNDS. AGAIN, DOE VERSUS MYSPACE AS WELL.

7 AND IN ALL OF THESE CASES, THE COMMON
8 DENOMINATOR IS THAT THE DEFENDANTS, LIKE SNAP HERE,
9 MERELY PROVIDED A COMMUNICATIONS PLATFORM WHICH CERTAIN
10 USERS DECIDED TO USE TO COMMUNICATE ABOUT ILLEGAL
11 ACTIVITY.

12 SO, IN ALL THE PRIOR CASES THAT I JUST
13 MENTIONED -- SEX CRIMES, MASS SHOOTINGS, TERRORISM, DRUG
14 CRIMES -- THE PLAINTIFFS HAVE TRIED TO DISTRACT FROM THE
15 CENTRAL ISSUE THAT THE USER-GENERATED CONTENT -- AND JUST
16 SO WE'RE CLEAR, WHEN I SAY USER-GENERATED CONTENT, THAT'S
17 CONTENT THAT IS CREATED AND EXCHANGED BY THE USERS ON THE
18 PLATFORMS. AND THE PLAINTIFFS IN ALL OF THOSE CASES HAVE
19 DONE WHAT THE PLAINTIFFS ARE DOING HERE, THEY'RE TRYING
20 TO DISTRACT FROM THE FACT THAT THE USER-GENERATED CONTENT
21 HERE, THE HARM IS FROM THE MESSAGES THAT WERE CREATED AND
22 EXCHANGED BY THE USERS AND THE DRUG DEALERS TO CONSUMMATE
23 A DRUG SALE.

24 AND I GUESS I WOULD SAY -- PLAINTIFFS ARE
25 SAYING "WELL, WAIT A MINUTE, WE'RE NOT SEEKING TO HOLD
26 SNAP LIABLE FOR CONTENT, WE'RE FOCUSING ON THEM AS A
27 CREATOR OF A DEFECTIVE DESIGNED APPLICATION." SO, THE
28 DEVELOPER OF A PRODUCT. AND THEY LIST 21 WHAT THEY CALL

1 DEFECTS THAT THEY CLAIM MAKE SNAPCHAT INHERENTLY
2 DANGEROUS.

3 BUT, COURTS HAVE CONSISTENTLY DETERMINED
4 THAT CLAIMS RELYING ON THESE EXACT SAME DESIGN DEFECTS
5 CANNOT EVADE THE SCOPE OF SECTION 230.

6 AND I THINK THE NINTH CIRCUIT SAID IT BEST
7 IN DIEROFF WHEN IT REJECTED THESE EXACT SAME ARGUMENTS.
8 THE NINTH CIRCUIT HELD THAT PLAINTIFFS CANNOT PLEAD
9 AROUND 230 IMMUNITY BY TARGETING FEATURES AND FUNCTIONS,
10 INCLUDING ALGORITHMS TO ANALYZE AND RECOMMEND CONTENT,
11 EVEN WHEN THE CLAIM IS CLOAKED IN THE GARB OF PRODUCTS
12 LIABILITY.

13 FORCE VERSUS FOR FACEBOOK IS ANOTHER, I
14 THINK, REALLY IMPORTANT DECISION, YOUR HONOR. THAT'S THE
15 SECOND CIRCUIT. AFFIRMED THE DISTRICT COURT'S DISMISSAL
16 OF PLAINTIFFS' CLAIMS HOLDING "WE DISAGREE WITH
17 PLAINTIFFS' CONTENTION THAT -- THAT FACEBOOK'S ALGORITHMS
18 RENDERS IT A NON-PUBLISHER."

19 "ARRANGING AND DISTRIBUTING THIRD-PARTY
20 INFORMATION INHERENTLY FORMS CONNECTIONS AND MATCHES
21 AMONG SPEAKERS AND VIEWERS OF CONTENT."

22 THAT IS ESSENTIAL RESULT OF PUBLISHING.
23 ACCEPTING PLAINTIFFS' ARGUMENT WOULD EVISCERATE SECTION
24 230 --

25 THE COURT: CAN I INTERRUPT YOU PLEASE --

26 MS. GRANT: YES.

27 THE COURT: I HEAR YOU; I UNDERSTAND YOUR
28 ARGUMENT.

1 IS -- WELL, I, GUESS THE QUESTION IS CAN I
2 DECIDE THIS AT THE PLEADING STAGE?

3 I KNOW YOUR ANSWER. YOUR ANSWER IS "YES,
4 YOU CAN, JUDGE RIFF."

5 BUT, I'M THINKING TO MYSELF -- ACTUALLY,
6 I'M GOING TO WITHHOLD THAT COMMENT. MY QUESTION IS
7 REALLY BETTER DIRECTED TO THE NEXT PHASE OF YOUR
8 ARGUMENT, WHICH IS BASICALLY, WELL, EVEN IF 230 DOES NOT
9 APPLY. THEN MY QUESTION -- I WILL LET YOU THINK ABOUT IT
10 OVER LUNCH -- IS SHOULD I NOT PERMIT DEVELOPMENT OF THE
11 FACTUAL RECORD.

12 AND I'M PROBABLY DISTRACTING YOU FROM YOUR
13 230 COMMENT --

14 MS. GRANT: I CAN ACTUALLY ANSWER THAT QUESTION
15 BECAUSE YOU ASKED FOR BINDING AUTHORITY AND I CAN GIVE IT
16 TO YOU.

17 SO, YOUR QUESTION IS IS THIS THE PROPER
18 PLACE OR SHOULD WE WAIT FOR AN EVIDENTIARY RECORD AND
19 MAYBE DO MSJ OR SOMETHING LATER ON --

20 THE COURT: YEAH, AND LET ME JUST FLESH THAT OUT A
21 LITTLE BIT.

22 SO, IF THE QUESTION IS -- PUTTING 230 ASIDE
23 FOR A MINUTE BECAUSE I WANT YOU TO UNDERSTAND THAT I
24 UNDERSTAND YOUR POINT, WHICH IS THAT NO MATTER HOW
25 PLED -- WHETHER WE CALL IT A COUNT, A THEORY, OR ANYTHING
26 ELSE -- 230 IMMUNIZES SNAP'S ALLEGED CONDUCT IN THIS CASE
27 PERIOD, END OF STORY. I DO UNDERSTAND THE ARGUMENT.
28 OKAY. AND PRESUMABLY AFTER LUNCH YOU'RE GOING TO TELL ME

1 MORE ABOUT THAT.

2 BUT, JUMPING AHEAD AND -- IF 230 FOR SOME
3 REASON DIDN'T EXIST OR DOESN'T APPLY AND NOW THE COURT IS
4 CONFRONTED WITH DOES STRICT PRODUCTS LIABILITY APPLY TO
5 THESE SET OF FACTS, SHOULD THE COURT PERMIT THE
6 DEVELOPMENT OF A FACTUAL RECORD IN ORDER TO MAKE THAT
7 DETERMINATION?

8 IF YOU DON'T CHOOSE TO ADDRESS THAT NOW,
9 IT'S FINE.

10 MS. GRANT: SURE. LET ME JUST -- OKAY. SO, THE
11 DEMURRER IS THE PROPER PLACE BECAUSE NO AMOUNT OF
12 AMENDMENT IS GOING TO CHANGE THIS FUNDAMENTAL PART OF
13 THEIR CASE. THE HARM HERE COMES FROM THE CONTENT. SO,
14 IF THE DRUG DEALER AND THE USER WERE JUST CONNECTED AND
15 THEY NEVER COMMUNICATED -- SO, LIKE, MAYBE YOU HAVE SOME
16 FACEBOOK FRIENDS YOU HAVE NO COMMUNICATION, RIGHT. SO IF
17 THEY'RE JUST CONNECTED, THERE IS NO HARM. THERE IS --
18 THEY NEVER EXCHANGE ANY COMMUNICATION.

19 IF THEY WERE CONNECTED AND THEY EXCHANGED
20 COMMUNICATION ABOUT CAT MEMES OR THE LA RAMS OR WHATEVER,
21 NO HARM.

22 THE HARM HERE IS SPECIFICALLY RELATED TO
23 THE CONTENT OF THE MESSAGE: SETTING UP TO BUY DRUGS THAT
24 ULTIMATELY WERE LACED WITH FENTANYL.

25 NO AMOUNT OF PLEADING, NO AMOUNT OF -- YOU
26 DON'T NEED TO EVALUATE WITNESS CREDIBILITY, NOTHING WILL
27 CHANGE THE FACT THAT THE HARM HERE IS 100 PERCENT
28 DEPENDENT ON THE CONTENT. IF WE DIDN'T HAVE THE MESSAGES

1 ABOUT THE DRUGS, WELL, THE DECEDENTS WOULD STILL BE HERE
2 AND WE WOULDN'T. THE ONLY REASON THAT THEY WERE HARMED
3 IS BECAUSE THEY HAD COMMUNICATIONS ON A NEUTRAL
4 COMMUNICATIONS TOOL ABOUT PURCHASING DRUGS.

5 SO, THE DEMURRER IS THE RIGHT STAGE. AND,
6 IN FACT, SECTION 230 MAKES CLEAR IT'S IMMUNITY FROM SUIT.
7 AND, SO, THESE ARE PURELY LEGAL QUESTIONS, THEY DON'T
8 DEPEND ON THE DEVELOPMENT OF A FACTUAL RECORD.

9 NOW, TO YOUR OTHER QUESTION ABOUT "WELL,
10 STRICT LIABILITY IF I FIND SECTION 230 DOESN'T APPLY DO
11 WE STILL NEED TO GO FORWARD IN DISCOVERY," THE ANSWER IS
12 NO.

13 BUT, I KNOW WHAT TIME IT IS. IT'S NOON.
14 AND I AM HAPPY TO ANSWER THAT WHEN WE COME BACK FROM
15 LUNCH BREAK --

16 THE COURT: LET'S DO THAT.

17 IT IS NOON. WE WILL BE IN RECESS -- WHY
18 DON'T YOU AGGREGATE YOURSELVES RIGHT AROUND 1:30 AND
19 SHORTLY THEREAFTER WE WILL GET THE DOORS OPEN AND
20 CONTINUE WITH OUR HEARING.

21 THANK YOU.

22
23 (ENDING TIME: 12:00 A.M. P.M. SESSION
24 REPORTED BY GAIL DAVIDSON.)
25
26
27
28

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 FOR THE COUNTY OF LOS ANGELES

3 DEPARTMENT SSC 7

4 AMY NEVILLE; ET AL.,)

5)
6 PLAINTIFFS,)

7 VS.)

CASE NO. 22STCV33500

8 SNAP INC.,)

REPORTER'S
CERTIFICATE

9 DEFENDANT.)
_____)

10
11
12
13 I, GAIL PEEPLES, PRO TEMPORE OFFICIAL REPORTER

14 OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY

15 OF LOS ANGELES, DO HEREBY CERTIFY THAT THE FOREGOING

16 PAGES 1 THROUGH 35, INCLUSIVE, COMPRISE A FULL, TRUE, AND

17 CORRECT TRANSCRIPT OF THE PROCEEDINGS HELD IN DEPARTMENT

18 SSC 7 ON OCTOBER 18, 2023, IN THE MATTER OF THE

19 ABOVE-ENTITLED CAUSE.

20 DATED THIS 20TH DAY OF OCTOBER, 2023.

21
22 
23 _____
24 GAIL PEEPLES, CSR NO. 11458
25 PRO TEMPORE REPORTER
26
27
28

1	4	ACCIDENT 14:1
1 16:4,11,20,21 35:16	4 16:22,24	ACCOUNTABLE 25:4 26:20
10 4:13 11:4 17:22 21:27	40 21:27	ACKNOWLEDGE 24:27
100 33:27	42 15:24	ACKNOWLEDGED 24:24 29:26
11 4:13 17:26 18:5	437(C) 17:7	ACTION 11:12,13,16 15:20,27 17:9,24 18:12
11458 4:6 35:23	4:15 7:9	ACTIONS 25:7 26:1
11:00 4:7	5	ACTIVITY 30:11
12 4:14 18:3	5 16:22,25 17:12	ACTORS 28:15 29:8
128.7 18:28	6	ACTUAL 13:11
12:00 34:23	6 4:13 16:22,25	ADDITION 7:13
13 16:22,27 18:6	7	ADDRESS 4:28 23:16 24:7 33:8
14 18:8	7 4:4,11,13 16:22,26 35:3,18	ADEQUATELY 24:13
15 18:12 24:9	8	ADJUDICATION 17:7,9,11
16 15:19,23 18:18	8 4:13 17:14	ADOPT 27:18
18 4:3 35:18	800 15:10	ADVISE 19:7
1996 25:21	9	AFFIRMED 29:27 31:15
1:30 7:8 34:18	9 4:13 17:20	AFRICAN 28:20
1:45 7:8	900 15:10	AGGREGATE 34:18
2	A	AGREE 13:23 14:8,12,16,18 25:1
2 16:13 28:3	A.M. 4:7 34:23	AGREEMENT 24:27
20 21:24	ABETTING 17:23	AGREES 14:1
2023 4:3 7:23 23:23 25:17 27:21 35:18,20	ABOVE-ENTITLED 35:19	AHEAD 33:2
20TH 35:20	ABSENT 17:7	AIDING 17:22
21 30:28	ABSTRACT 7:26	ALBEIT 25:21
216 15:8	ABSTRACTS 8:1	ALEX 6:5,8
22STCV33500 4:1 35:6	ABUSE 25:8 26:21	ALEXANDER 6:7
230 22:15 24:14,18,21 25:12 26:25 27:3,19 28:7,28 29:2,14,28 30:2,6 31:5,9,24 32:8,13,22,26 33:2 34:6,10	ACCEPT 22:18,20,21	ALGORITHMS 28:14,24 31:10, 17
3	ACCEPTING 31:23	ALLEGATIONS 9:7,19 10:1,3, 15 15:13 19:2 22:17,21
3 11:4 16:17	ACCESS 28:6	ALLEGED 10:28 11:11 24:19 28:23 32:26
30 22:2,4		ALLEGEDLY 28:25
35 35:16		ALTERNATIVE 14:24 15:26
		AMANDA 4:16
		AMEND 12:24 30:5
		AMENDED 9:17,19 15:7,15,18

AMENDMENT 33:12	ASSUME 10:2,27	BOX 10:21
AMERICAN 28:20	ATT 26:16	BRANDS 26:24
AMOUNT 33:11,25	ATTORNEY 19:23	BREAK 24:11 34:15
AMY 4:16 35:4	AUTHORITY 24:1 27:8 28:4 30:4 32:15	BREWER 4:20
ANALYZE 31:10	AVOID 26:25	BRIEFLY 9:23 16:3 20:28
ANGELES 4:3 35:2,15	AWKWARD 5:16	BRING 18:16
ANONYMOUS 29:20		BROAD 29:6
ANSWERS 24:1	<hr/> B <hr/>	BROADLY 27:4
APOLOGIES 6:8		BROUGHT 18:26 19:11
APOLOGIZE 20:15	BACK 21:17 25:15,26 34:14	BULLETIN 20:6
APOLOGIZES 21:17	BAD 28:15 29:8	BUNCH 14:13,14
APPARENT 8:6	BALANCING 29:6	BURDEN 12:5
APPEAL 24:1 28:4	BAR 29:2	BURRIS 4:20
APPEALS 30:4	BARKER 16:9,20	BUSINESS 15:25
APPEARANCE 5:18,28	BARRED 28:7,28	BUTTON 5:2
APPEARANCES 4:8,23	BARRETT 27:17	BUY 26:9 33:23
APPEARING 5:7,9,12,13,17,19 6:15,23	BASHA 5:19	<hr/> C <hr/>
APPLICATION 30:27	BASHFUL 22:6	
APPLIED 20:3	BASICALLY 9:28 15:25 32:8	CAIN 6:20
APPLIES 7:23 8:27 22:17 25:17	BASIS 6:12	CALENDAR 4:12 7:13 18:24 19:11
APPLY 7:23 9:2 13:24 14:9,19 17:17 23:1 24:21 32:9 33:3,4 34:10	BEARS 29:13	CALIFORNIA 4:3 8:26 11:13 15:28 16:7,16 17:18 18:9 23:19, 28 27:2,15,19 28:4 30:1 35:1,14
ARCHITECTURE 8:20 28:24	BEGINNING 8:13	CALIFORNIA'S 22:28
AREA 29:15	BEHALF 5:7,9,12 6:2,5,18 21:23	CALL 4:14 15:16 30:28 32:25
ARGUE 20:9	BENCH 20:25	CALLED 9:8,22 10:16 11:10 14:4,10 16:26
ARGUMENT 27:17 31:23,28 32:8,27	BENEATH 8:20 15:26	CALLS 26:14,15
ARGUMENTS 9:21 22:1 31:7	BENEFIT 16:17	CANE 6:17,22
ARISE 26:5	BENEFITS 29:7	CAROLINA 28:19
ARISES 9:16	BERGMAN 5:6,7 21:3	CARRIE 5:13
AROSE 23:13	BERMAN 9:14	CASE 4:1,2 9:5,15,20 10:16 11:9 13:22 14:1 20:3,6 24:26 27:17 28:22 32:26 33:13 35:6
ARRANGING 31:19	BIG 7:28 13:20	CASES 4:13 7:14,21 8:3,14,27 9:6 10:19 13:3 19:19 23:10 30:7, 12,18
ART 11:13	BINDING 23:28 28:4 30:4 32:15	CAT 33:20
ASSERT 25:6	BIT 7:17 22:1 32:21	
ASSERTED 16:1,12 22:22	BITS 10:22	
ASSERTION 17:16 22:24	BOARD 20:6	
	BOLTED 21:19	
	BORNE 23:21	
	BOUNDS 22:16	

CATEGORICAL 23:9	COMMUNICATE 27:22 28:6 30:10	CONSUMMATE 30:22
CCP 17:7	COMMUNICATED 33:15	CONTENT 26:6,8 28:10,26 29:3 30:15,16,17,20,26 31:10,21 33:13,23,28
CDA 25:12,18 26:4	COMMUNICATING 12:9	CONTENTION 31:17
CENTRAL 30:15	COMMUNICATION 25:8,25 33:16,18,20	CONTINUE 34:20
CERTAINTY 20:24	COMMUNICATIONS 26:13 28:9 30:9 34:3,4	CONTRACT 12:5
CERTIFICATE 35:8	COMMUNITY 8:14	CONTRARY 27:9,15,19
CERTIFY 35:15	COMPANIES 26:26	CONTROL 26:1
CETERA 24:17,20	COMPETING 10:22	CONUNDRUM 15:6
CHAINSAW 23:5	COMPLAINT 9:9,17 10:1,4,6,28 12:24 15:7,8,12,15,16,18	CONVERSATION 7:15
CHALLENGE 9:26 10:5 11:11	COMPLETED 7:12	CONVINCED 23:4,8
CHANGE 33:12,27	COMPLETELY 16:15 27:19	CORRECT 13:8 35:17
CHILD 8:4	COMPRISE 35:16	COSTS 29:13
CHOOSE 33:8	CONCEALMENT 17:27 18:1	COUNSEL 4:23 5:5,18,27 9:1,12 11:4,7 15:22 16:2 19:20 20:28 21:17,20
CHURCH 28:20	CONCEPT 19:12	COUNT 11:17 16:4,11,13,17,19, 20,24,25,26,27 17:12,14,20,22,26 18:3,5,6,8,12,18 32:25
CIRCUIT 26:23 28:8 29:26 31:6, 8,15	CONCLUSION 22:24	COUNTERFEIT 25:2,9
CIRCUIT'S 30:2	CONCLUSIONS 22:22	COUNTS 15:20,23,25 16:1,22
CIRCUMSTANCES 18:14,16	CONDUCT 32:26	COUNTY 35:2,14
CITED 27:8	CONFERENCES 7:14 19:18	COURT 4:10,28 5:6,8,15,21,23, 27 6:3,6,9,12,15,22 7:21 8:7 9:9, 15 10:11 12:22 13:12,14,15 15:12 17:17 21:4,7,9,12,15 22:6,13 23:19,20,28 24:1 25:21 27:2,6,8, 13,16 28:4,13,27 29:4 30:4 31:25, 27 32:20 33:3,5 34:16 35:1,14
CIVIL 8:27 12:12 18:28	CONFERRED 19:24	COURT'S 9:18 27:15 31:15
CLAIM 18:17 24:15 25:13 31:1, 11	CONFIDENCE 20:2	COURTCONNECT 4:27 5:17 6:19,24
CLAIMS 24:19 25:11 26:5 28:5, 28 29:2 31:4,16	CONFRONTED 13:6 33:4	COURTROOM 7:7 22:10 24:24
CLARIFICATION 18:19	CONGRESS 25:19,28 29:9,13	COURTS 29:1,10 30:1 31:3
CLEAR 8:10 17:10,15 30:16 34:6	CONNECT 6:16	CREATE 26:27
CLOAKED 31:11	CONNECTED 33:14,17,19	CREATED 26:8 30:17,21
CLOSE 7:7 20:10	CONNECTIONS 31:20	CREATOR 30:27
CODE 18:27	CONSEQUENCE 19:2	CREDIBILITY 33:26
COLLECTION 4:13 9:7,21 23:2	CONSEQUENCES 29:16	CRIMES 28:3 29:16 30:13,14
COLLECTIONS 12:3	CONSIDERED 19:14 25:19	CRIMINAL 25:7
COLOR 14:2	CONSISTENTLY 29:1 31:3	
COMMENT 7:3 11:5 12:10 21:1 32:6,13	CONSORTIUM 18:18	
COMMENTS 7:1,3,20 15:24 24:22	CONSTITUTE 11:12	
COMMERCE 23:21	CONSTITUTION 8:22,25	
COMMON 11:8 30:7	CONSTRUED 27:4,9	
	CONSUMER 16:10,12,21	

CRIMINALS 26:20	DEFENSE 5:26 20:15,16 21:5	DISMISSAL 29:27 31:15
CSR 4:6 35:23	DEFINED 11:13	DISMISSED 12:20
<hr/>	DELIVERY 26:28	DISPUTE 13:22
D	DEMURRER 9:22,28 10:26 11:3, 11 12:15,19,20,22,27 13:5,7 14:22 15:4 19:14 20:9,24 22:27 25:10 27:23 30:5 33:11 34:5	DISPUTED 14:15
<hr/>	DEMURRERS 18:24	DISTRACT 30:14,20
D-E-M-U-R-R-E-R 9:22	DENIED 13:1	DISTRACTING 32:12
DAMAGES 10:10 18:21	DENIES 10:3	DISTRIBUTING 31:19
DANGEROUS 31:2	DENOMINATED 16:4,14,17,23, 24 17:14,22,26 18:3,8,12	DISTRICT 31:15
DATED 35:20	DENOMINATOR 30:8	DOCUMENT 9:8
DATES 7:18	DEPARTMENT 4:4,11 35:3,17	DOCUMENTS 13:14 19:8
DAUGHTER 28:22	DEPEND 34:8	DOE 26:23 28:3 30:6
DAVIDSON 34:24	DEPENDENT 33:28	DOORS 34:19
DAY 7:3,6,17 35:20	DESCRIBE 11:8	DOSE 25:3 29:25
DEADLY 25:9	DESIGN 16:5,8,25 28:24 31:4	DOUBT 24:26 29:27
DEAL 26:16	DESIGNED 30:27	DOZENS 8:3
DEALER 29:23 33:14	DETAILED 15:13	DRAPER 5:9 15:11
DEALERS 25:2 26:9 30:22	DETERMINATION 29:14 33:7	DRILL 22:3
DEALING 28:1	DETERMINE 24:21	DROP 12:21
DEATH 18:8,11,17	DETERMINED 31:3	DRUG 8:5 25:2 26:8,16 29:16,23 30:13,22,23 33:14
DEBATES 10:16	DEVELOPER 30:28	DRUGS 25:9 26:9,22 33:23 34:1, 4
DEBATING 10:14	DEVELOPMENT 32:10 33:6 34:8	DUE 8:23,26 17:19
DECADES 16:8	DIANA 4:19	<hr/>
DECEDENT 18:11	DIED 29:25	E
DECEDENTS 26:9 34:1	DIEROFF 29:18 31:7	<hr/>
DECIDE 10:23 11:8,11 32:2	DIES 18:15	EASILY 5:1
DECIDED 13:7,11 14:22,25 23:14 30:10	DIFFERENCE 17:3,5 22:23	ECHO 24:23
DECIDES 14:26,28	DIFFERENTLY 13:9	EDUCATION 8:23
DECIPHER 9:24	DIMENSIONS 23:7	ELECTRONIC 7:24 25:17
DECISION 31:14	DIRECTED 18:27 32:7	ELECTRONICALLY 27:22
DECLARATION 19:5	DISAGREE 31:16	ELEMENTS 18:21
DECLARATIONS 13:21	DISAGREEMENTS 8:8	EMAIL 26:13
DEEMING 24:4	DISCOVERY 34:11	EMPATHY 24:25 27:25
DEFECT 16:5,8	DISMISS 29:1	ENABLED 29:20
DEFECTIVE 11:24 16:24 30:27		END 6:24 9:4 20:12 23:3 32:27
DEFECTS 31:1,4		ENDING 34:23
DEFENDANT 6:16 9:20 35:8		ENDS 28:16
DEFENDANTS 30:8		

ENGAGEMENT 28:25	FAILED 28:11	FUNDAMENTAL 33:12
ENTITLED 8:26 10:7	FAILURE 16:14,25 17:11	FUTURE 17:6
EPHEMERAL 26:14	FALSE 19:1	
EQUALLY 27:1 28:1	FAMILIES 8:3,11	<hr/> G <hr/>
ERNESTO 6:21	FAVOR 27:4	GAIL 4:6 34:24 35:13,23
ESSENTIAL 31:22	FEATURES 31:9	GAIN 28:6
EUBANKS 4:17	FEEL 24:25 27:25	GALLERY 21:16
EVADE 31:5	FEELING 17:1	GARB 31:11
EVALUATE 33:26	FENTANYL 25:3 29:25 33:24	GENERALLY 12:3
EVIDENCE 10:22 13:14,20,21 14:14	FIGURATIVELY 19:13	GIVE 20:8 21:27 24:9 28:2 32:15
EVIDENTIARY 32:18	FIGURE 13:27 14:2	GIVING 12:12
EVISCERATE 31:23	FILED 9:9	GLENN 5:9
EXACT 31:4,7	FILING 9:21	GOAL 12:11
EXCHANGE 26:10 33:18	FIND 9:12 17:19 34:10	GOLDBERG 5:13
EXCHANGED 29:4 30:17,22 33:19	FINE 33:9	GONZALES 28:8
EXCHANGING 26:3	FLESH 32:20	GOOD 4:10 5:14 6:1,4
EXIST 19:15 26:15 33:3	FLOOR 20:7,28 21:19	GOOGLE 28:10,11 30:3
EXPECTATION 16:10,12,21	FOCUSING 30:26	GOOGLE'S 28:9
EXPECTED 26:2	FOERSTER 6:18	GRANT 6:1,2 12:22 21:6,8,11,14, 22,23 22:8 23:13 24:6 25:22 27:7, 12,14 31:26 32:14 33:10
EXPLAIN 8:16 9:23	FOLKS 6:18,28	GRANTED 12:28 28:28
EXPLORE 22:4	FOOTNOTE 12:21	GREAT 10:3
EXPRESSLY 28:7	FORCE 31:13	GREEN 5:2,3 13:28 14:2,17,27
EXTEND 17:25	FOREGOING 35:15	GRIMES 6:21
<hr/> F <hr/>	FORM 9:8 23:21	GROUND 29:28 30:6
FACE 27:23	FORMS 31:20	GUESS 17:18 23:25 30:24 32:1
FACEBOOK 31:13 33:16	FORUMS 29:20	GUNNED 28:23
FACEBOOK'S 28:24,28 31:17	FORWARD 12:8 13:3 34:11	GUZMAN 6:21
FACT 8:2 10:2 14:13,25 26:20 30:20 33:27 34:6	FRANKLY 26:12	<hr/> H <hr/>
FACTFINDER 14:26,27	FRAUD 18:1,2	HAPPEN 10:16
FACTS 8:8 11:11 13:13,20,21,22, 23,24,25,27 14:7,8,9,13,15,19 23:2 29:27 33:5	FRAUDULENT 17:26 18:3	HAPPENED 26:13
FACTUAL 9:7 10:22 13:11 22:21,23 32:11 33:6 34:8	FREQUENTLY 11:15 14:11	HAPPY 21:14 34:14
FAIL 24:20 25:11,13	FRIENDS 33:16	HARD 4:26
	FRONT 9:4 20:12 22:14 23:3	HARM 29:7 30:21 33:13,17,21, 22,27
	FULL 35:16	
	FULLY 24:13	
	FUNCTION 29:9	
	FUNCTIONS 31:9	

HARMED 34:2	INCLUDING 31:10	JOINED 6:20
HARMFUL 26:27	INCLUSIVE 35:16	JOSEPH 6:7
HASSELL 27:3	INDEPENDENT 25:11	JUDGE 4:5,10 13:19,24 14:8,14, 26 32:4
HEADING 17:28	INDIFFERENT 21:12	JUDGES 11:16
HEAR 4:26 10:21 21:12 31:27	INFER 16:11,18	JUDGMENT 14:5,10,23
HEARING 5:25 7:11 12:15 19:9, 21 34:20	INFORMATION 31:20	JUMPING 33:2
HEARINGS 7:11	INHERENTLY 31:1,20	JURISPRUDENCE 30:2
HELD 25:4 27:3 28:4,9,14,27 31:8 35:17	INJUNCTIVE 10:11	JURY 10:20,21 14:25,28
HEROIN 29:21,22,24	INJURIES 8:4	JUSTICE 23:14
HISTORIC 23:4	INKLING 13:12,15	JUSTIN 6:20
HOLD 6:6 7:6 19:9 23:6 26:19 29:2 30:25	INQUIRE 27:6	<hr/> K <hr/>
HOLDING 27:15 31:16	INTENTIONAL 11:27	KATHERINE 4:20
HON 4:4	INTERCHANGEABLY 11:18	KIND 21:27 23:16
HONOR 6:1,4,8,11,17 21:3,6,8, 22,25 24:23,28 27:20 28:17 29:5, 18 31:14	INTERCONNECTEDNESS 7:24,25 25:18	KNOWINGLY 19:1
HONOR'S 24:8	INTEREST 8:14	<hr/> L <hr/>
HORRIFIC 28:18	INTERESTED 23:27	LA 5:17 6:15 33:20
HOUR 20:9,12,17,21	INTERFERENCE 17:15	LACED 25:3 29:24 33:24
HUGE 22:15	INTERMEDIARIES 26:28	LANGUAGE 11:8
HYPOTHETICALLY 17:10	INTERMEDIARY 26:10	LARGE 10:26
<hr/> I <hr/>	INTERNET 24:15 26:24 29:3,7	LAURA 5:11
IDENTIFY 6:25	INTERPRETATION 27:18	LAW 7:23 8:9,17,24,26 9:2 11:1, 14 13:25 14:9,20 17:16,18 20:3 22:22,24,28 23:12,14,15 24:21 25:16 27:19
ILLEGAL 28:16 30:10	INTERPRETED 29:2	LAWRENCE 4:4,10 6:4,5,7,10, 11,14
IMMUNITY 27:4,9 31:9 34:6	INTERPRETING 16:3	LAWSUIT 8:20 9:5 10:8,9 12:19 18:16
IMMUNIZE 26:4	INTERRUPT 31:25	LAWYERS 4:24 9:6,7,25 11:14, 16 19:1
IMMUNIZES 24:14 32:26	INTUITIVE 16:28 17:23	LAY 21:27
IMPORTANT 8:15 22:9 27:1 31:14	INVOLVE 8:3	LEAVE 17:12 22:10 30:5
IMPORTANTLY 30:1	ISIS 28:11,15	LECTURE 12:12
IMPOSITION 26:26	ISP'S 26:4	LEGAL 8:20 9:21 10:4,5,7 11:17, 24 12:3,6,17,25 15:19,26 17:2,24, 25 18:10 19:2,12 25:6 27:26 34:7
IMPRESSION 27:24	ISSUE 11:7 22:27 25:15 27:24 30:15	
INADEQUACIES 23:15	ISSUES 9:16 13:4,6,11 14:21 15:3 22:3 27:22	
INCLUDE 11:26	ITEMS 7:20	
INCLUDES 11:25,26	<hr/> J <hr/>	
	JENNIFER 4:18	
	JESSICA 6:2 21:23	

LETHAL 25:3 29:24	MATERIAL 19:15	MOVING 20:14,17
LIABILITY 11:21,23,25,28 12:1,2 16:5,8,13,19 17:25 22:28 23:1,13, 24 24:16,20 26:26 28:15 29:12 31:12 33:4 34:10	MATTER 9:3,4 24:20 32:24 35:18	MSJ 32:19
LIABLE 25:7 26:16 28:10 29:3 30:26	MATTERS 4:13 10:22 15:21 20:26	MURDERED 28:20
LIGHT 5:3 13:28 14:1,3,16,27	MATTHEW 5:6	MURPHY 27:3,16
LIKEWISE 6:26	MAXIMIZED 28:25	MYSPACE 28:3,5 30:6
LIST 30:28	MEANING 9:17 12:28 13:1 18:27 19:8	<hr/> N <hr/>
LITIGATION 13:2,6,18	MEANINGFUL 7:15	N-I-K-E-S-H 19:6
LONG 15:8,12 21:12 28:18	MEANS 9:24 12:2 13:1,13 25:8 26:21	NAMES 29:21
LOS 4:3 35:2,15	MEDIA 23:24	NARROW 27:18
LOSE 8:1 12:18,19 26:6	MEMBERS 8:16	NARROWLY 27:9
LOSS 8:4,12 18:18	MEMES 33:20	NEGLIGENCE 11:26 12:4 16:23, 24,25,26 17:2 18:7 23:15 24:16, 20
LOSSES 8:14 23:20 24:25 27:26	MENTIONED 30:13	NEGLIGENT 16:27 17:11 18:6
LOT 7:12 25:24	MERITS 25:14	NEUTRAL 28:9 34:3
LOTS 8:6 27:21	MESSAGE 25:25 29:21 33:23	NEVILLE 4:2,16 9:11,14,15 15:8 35:4
LOTES 5:22	MESSAGES 25:26 26:3,11,27 30:21 33:28	NIKESH 19:5
LOVE 29:21	MESSAGING 29:20	NINTH 26:23 28:8 29:26 30:2 31:6,8
LULL 16:10,20	METES 22:16	NON-PUBLISHER 31:18
LUNCH 24:9,11 32:10,28 34:15	MICROPHONES 5:1	NOON 7:6,7 20:19 34:13,17
LYNDSEY 6:20	MIND 15:2 22:7	NORMS 7:23 25:16,20
<hr/> M <hr/>	MINISTER 28:23	NOTE 11:19
MADE 9:7 19:1 29:14	MINORS 28:7	NOTED 4:8 25:10
MADLINE 5:19	MINUTE 30:25 32:23	NOTING 29:1
MAJOR 22:27	MINUTES 21:24,27 22:2,4 24:9	NUISANCE 17:20 24:17
MAKE 4:25 5:2,3,18 12:9 17:4,5 28:10 31:1 33:6	MISREPRESENTATION 16:27 17:27 18:4,6	NUMBER 4:1
MAKES 34:6	MISREPRESENTATIONS 18:1	NUMEROUS 4:26
MARCUS 6:21	MONEY 10:10	<hr/> O <hr/>
MARKETED 23:17	MORNING 4:10,12 5:14 6:1,4 21:2	OBLIGATED 7:7 10:27 22:17, 20,21
MARKING 19:13	MORRISON 6:18	OBSERVE 7:28 11:6 16:28
MARQUEZ-GARRETT 5:11	MOTION 18:26 19:4,11 29:1	OBSERVING 6:19
MASKS 23:7	MOTIONS 7:13	OCCUPIES 23:7
MASS 23:16,17 28:17 30:13	MOVE 5:1 17:11 20:26 24:18	OCCUR 18:2
MATCHES 31:20	MOVED 21:18	

OCCURRED 28:18	PERCENT 33:27	POTENTIALLY 26:27
OCCURS 9:4 10:18	PERIOD 32:27	PRAGER 30:3
OCTOBER 4:3 35:18,20	PERMISSION 9:18	PRECLUDE 10:12
OFFICIAL 35:13	PERMIT 11:24 32:10 33:5	PREDATORS 28:6
OHIO 16:7	PERSON 18:14,15 29:19	PREDOMINANTLY 28:20
ONLINE 25:23,28 28:14	PHASE 32:7	PREFER 21:11
OPEN 24:2 34:19	PHONE 26:14,15,21	PRELIMINARY 7:1,2,20 11:5 15:24
OPERATE 8:9	PICK 20:20	PREPARED 19:21 21:7
OPERATES 7:25	PICTURE 7:28	PRESCREEN 26:2
OPERATIVE 15:7,17	PILLS 25:2	PRESENTED 26:5
OPPORTUNITY 12:23	PLACE 32:18 33:11	PRETTY 7:26 26:24
ORDER 33:6	PLAINTIFF 12:6 20:21 28:22	PREVENT 28:11
ORDERS 10:11	PLAINTIFF'S 15:22 28:27	PREVIOUSLY 4:8
OUTCOME 12:18	PLAINTIFFS 5:7,10,12,14,18,20, 22 9:5,6 10:6,10,28 12:17,18,19, 23 17:17 18:27 19:1 24:25 25:5 26:19 27:8,26,28 30:14,18,19,24 31:8 35:5	PRINCIPAL 9:3
OVERDOSE 8:5	PLAINTIFFS' 4:24 6:26 9:18 15:18 19:12 20:8,28 24:19 25:11 31:16,17,23	PRINCIPALLY 12:16
OVERRULED 13:1		PRIOR 30:12
OVERVIEW 21:28 24:10 28:2		PRIVATE 26:3
<hr/>		PRIVITY 12:4
P		PRO 35:13,23
<hr/>		PROBABILITY 7:11
P.M. 34:23	PLAN 20:5	PROBLEM 4:28 11:20 12:24,25
PAGES 15:8 35:16	PLANNING 21:25	PROBLEMATIC 11:15
PAPERS 8:7 11:27 15:3 19:14 27:10	PLATFORM 25:25 28:12,16 30:9	PROCEDURAL 8:21 9:4,16 13:8
PARAGRAPHS 15:9	PLATFORMS 26:1 30:18	PROCEDURE 12:12 15:28 18:28
PARAPHRASE 9:27	PLATFORMS' 28:14	PROCEDURES 9:1
PARENTAL 17:15	PLEAD 31:8	PROCEED 21:7 24:3
PART 8:24,25 33:12	PLEADING 29:28 32:2 33:25	PROCEEDING 8:20 17:18
PARTICIPATING 4:27	PLED 32:25	PROCEEDINGS 7:6 35:17
PARTIES 8:7,10,26 10:20 17:8 25:7 26:1	PLUNK 4:18	PROCESS 8:21,24,26
PARTY 14:5,7,18 17:8,10 20:14, 17	PODIUM 21:9,14,18	PROCESSES 9:1
PASSED 26:4	POINT 12:27 13:26 29:19 32:24	PRODUCED 23:17
PASSING 25:18	POLICY 26:25	PRODUCT 11:25 22:28 23:1,5 30:28
PEEPLS 4:6 35:13,23	PORTION 19:4	PRODUCTS 11:21,23,28 12:7 16:4,8,13,19 23:12,16,24 24:16, 19 29:12 31:11 33:4
PEN 19:13	PORTIONS 19:13	
PENETRATING 7:22	POSED 23:18	
PEOPLE 4:27 23:14 28:21	POSING 29:12	
	POSSIBILITY 7:10	
	POSTED 20:6 29:4,21	

PROFOUND 7:22 25:16	REASON 17:5 20:14 25:12 33:3 34:2	REQUIRE 10:12 12:4
PROMOTED 28:10	REBUTTAL 20:18,22 21:24	REQUIREMENT 23:9
PRONG 16:9,10,19	RECALL 15:8 27:11,12 28:17	RESEARCH 19:22
PRONGS 16:9	RECEIVED 29:22	RESERVE 20:11,12,18 21:24
PRONOUNCE 9:13	RECEIVES 13:14	RESOLVED 12:28
PROOF 12:5	RECESS 34:17	RESONATE 29:5
PROPER 13:5 32:17 33:11	RECOGNIZED 25:28	RESPECT 15:13
PROPOSITION 8:11 17:25	RECOLLECTION 27:10	RESPONSE 29:22
PROVIDE 11:2 18:10	RECOMMEND 31:10	RESULT 31:22
PROVIDED 30:9	RECORD 6:13 13:11 32:11,18 33:6 34:8	REZKALLA 6:20
PROVIDERS 24:15 29:3	RECORDS 26:15	RHONDA 4:20
PUBLIC 8:16 17:20 19:9 24:17	RECOVER 18:11	RIFF 4:4,11 32:4
PUBLISHING 31:22	RECOVER 18:11	RIGHTS 17:15
PUNISHMENT 18:27 19:3	RED 13:28 14:17,27	RISK 16:17
PURCHASED 29:23	REDUCED 12:5	RISK/BENEFIT 16:9
PURCHASING 34:4	REFER 11:23 15:22	ROBUST 29:7
PURE 12:25	REFERRING 15:17	ROJAS 6:21
PURELY 34:7	REFERS 18:20	ROLE 26:10
PURPOSES 10:4,26	REJECTED 31:7	ROLL 13:3
PUSH 27:18	RELATE 12:6	ROOM 4:24 5:27 11:14
PUT 8:24 25:10 27:27	RELATED 4:13 33:22	ROSENTHAL 27:17
PUTTING 32:22	RELATIONS 18:10	ROY 4:17
<hr/> Q <hr/>	RELEVANT 23:4	RULE 20:25
QUESTION 11:1 13:5 21:1 22:27 23:18,23,26 24:2,8,12 29:11 32:1, 6,9,14,17,22 34:9	RELIEF 10:7,11 11:17	RULES 8:21 19:7
QUESTIONS 7:22 22:2,5,8,11 25:16,19 34:7	RELYING 27:16 31:4	RULING 27:23
QUINTESSENTIALLY 29:9	REMAIN 4:27	RULINGS 19:26,27 20:1,4
<hr/> R <hr/>	REMAINING 22:4	<hr/> S <hr/>
RAISED 9:21,26 13:4 15:3 25:15	REMEDY 11:2,24 12:17 18:10	S-R-I-V-A-S-T-A-V-A 19:6
RAMS 33:20	REMEMBER 27:2	S-T-A-B-I-L-E 4:18
READ 9:10 15:14 19:22,23	RENDERS 31:18	SALE 30:23
READING 8:6	REPEAT 14:6	SANCTIONS 18:26
READY 21:21	REPORTED 34:24	SCOPE 31:5
	REPORTER 4:6,22 35:13,23	SCORE 29:22
	REPORTER'S 35:7	SCOURGE 8:5
	REPRESENT 15:26	SEAL 19:4
	REQUEST 19:16	

SEALED 19:8	SNAP 4:2,16,17,18,19,20,21 6:2, 5,18 9:20,26,27 10:3,5 12:16 13:4 18:26 19:5 21:23 24:15 25:6,25 26:10,19 30:8,26 35:7	STIPULATION 17:8
SEATED 4:28		STOP 20:19
SECTION 18:28 22:15 24:14,18, 21 25:12 26:25 27:3,19 28:7,28 29:2,14,28 30:2,5 31:5,23 34:6,10	SNAP'S 19:14 32:26	STORY 32:27
SEEK 10:7 12:23 17:8	SNAPCHAT 25:8 31:1	STRICKEN 19:16,17
SEEKING 10:10 17:7 26:9 29:2 30:25	SOCIAL 23:23 29:7	STRICT 11:25,28 12:2 16:4,8,13, 18 22:28 23:1,12,24 24:16 29:12 33:4 34:10
SELL 25:9 26:21	SOCIETAL 29:6	STRIKE 19:12
SENDING 25:25	SOCIETY 7:25 18:19 23:16,21	STUDIED 8:22
SENSOR 26:2	SOLD 25:2	SUBJECT 28:14
SEPARATE 11:18	SOLVABLE 12:25	SUBMISSION 20:24
SEPARATED 8:10	SOLVE 12:24	SUCCESSOR-IN-INTEREST 4:17
SERVICE 29:3	SOLVED 12:26	SUFFERED 8:11 27:26
SERVICES 29:8	SORT 15:1 21:28 29:15	SUFFERS 18:14
SESSION 34:23	SOUNDS 10:18	SUGGESTION 4:25
SET 9:19 33:5	SOUTH 28:18	SUIT 34:6
SETS 9:19 15:18	SPEAK 6:27 20:2	SUMMARY 14:5,10,23 17:7,9,11
SETTING 33:23	SPEAKERS 31:21	SUPERIOR 35:1,14
SEX 28:3 30:13	SPECIAL 19:7	SUPPLIED 8:7
SEXUAL 28:6	SPECIES 16:23 17:1,28 18:7	SUPREMACIST 28:19,25
SHARE 11:22 19:26	SPECIFICALLY 24:10 33:22	SUPREME 23:19,20 24:1 27:2, 15,16 28:13
SHOOTING 28:17	SPECIFICATION 17:28	SURREPTITIOUSLY 25:3
SHOOTINGS 30:13	SQUARELY 29:19	SURVIVAL 18:12
SHORTENED 4:15	SRIVASTAVA 19:6	SURVIVES 18:17
SHORTLY 34:19	SSC 4:4 35:3,18	SUSTAINED 12:28 30:5
SHOWING 12:4	STABLE 4:18	SYDNEY 5:22
SHOWS 14:14	STACK 13:20	
SHY 15:11	STAGE 13:2,5,18 29:28 32:2 34:5	
SIDE 4:24 5:26 6:26 9:18 13:18 14:11,20 15:18 17:6 19:12 20:8	STAGES 8:13	<hr/> T <hr/>
SIDES 13:23 14:8	START 24:18	TAAMNEH 28:13
SIGHT 8:1,2 26:6	STARTED 7:8 24:4,22	TAKING 20:24
SIMPLY 6:25 26:27	STARTING 4:24 5:27	TALKING 7:18 9:27 11:9 14:4 18:23
SIT 10:21	STATE 8:25 11:12 25:13 35:1,14	TANGIBILITY 23:5,8
SITS 14:26	STATEMENT 7:27	TARGETING 31:9
SITUATION 14:12	STATES 28:13	TECHNICALLY 9:10,17 15:22 16:7
SITUATIONS 28:1	STATUS 7:14 19:18	TECHNOLOGY 25:24
	STEP 25:15	

TELLING 23:28	TORTS 11:27 12:2	VERSUS 4:16,17,18,19,20,21 16:10,20 26:23 27:17 28:3 30:3,6 31:13
TEMPORE 35:13,23	TOUCH 23:6	VIABLE 16:16
TEN 7:20	TRAFFIC 14:1	VICARIOUS 17:25
TENTATIVE 19:25,27 20:1,4	TRAGIC 24:26 28:1 29:16,27	VIEWERS 31:21
TERM 11:13,15,16,21,28	TRAINED 8:17	VIRGINIA 17:16,18
TERMS 29:14	TRANSCRIPT 35:17	VOCABULARIZATION 11:7
TERRIBLE 8:4,5,12	TRAYNOR 23:14	VOCABULARY 11:20 15:6
TERRORISM 28:8,11 30:13	TRIAL 10:17,18,19 13:26 14:2, 16,17,25	<hr/> W <hr/>
TERRORIST 28:10	TRIALS 13:27	WAIT 30:25 32:18
TEST 16:17	TRUE 8:8 10:1,6,15,23,24 11:1,2, 12 12:16 13:13,15,16 22:18,21,22 35:16	WANTED 24:27
TESTS 23:4	TRUJILLO 4:19	WARN 16:14,25 17:12
TEXT 26:13	TURN 20:7,27	WARRANTY 23:15
THEORIES 11:24 12:3,6 15:20, 26 27:27	TURNING 21:17	WAYS 18:1 27:21
THEORY 11:17 16:12,14,16,19, 20,21 17:2,24 18:28 25:6 27:27 32:25	<hr/> U <hr/>	WEBSITE 29:19
THING 14:4 15:1 22:9,26 24:14 25:26 27:20	U.S. 8:24	WEDNESDAY 4:3
THINGS 8:28 10:9,12 11:19 12:1 15:23 18:24 19:16 25:24,27	ULTIMATELY 33:24	WHITE 28:19,25
THINKING 12:14 32:5	UNDERSTAND 8:15,19 10:13 12:14 15:27 16:15 17:20 18:4,9, 13,22 20:3 21:28 22:16 31:27 32:23,24,27	WIN 14:9,20
THIRD-PARTY 26:6 31:19	UNDERSTANDING 15:24 17:23	WINS 13:25
THOUGHT 29:23	UNFOLDING 7:4	WITHHOLD 32:6
THOUGHTFUL 7:15	UNITED 28:13	WITNESSES 13:14
THOUSAND 15:11	UNIVERSE 23:7	WORD 15:19,21 19:20
TIME 4:7 10:15 20:11,18 34:13, 23	UNIVERSITY 30:3	WORDS 8:23 11:22 12:9 15:27 16:11 17:21,23 18:9,13
TIMES 15:14 27:28	USER 33:14	WORLD 7:24 23:23 25:17
TITLE 4:15	USER-GENERATED 30:15,16, 20	WORRYING 8:28
TODAY 7:12 8:7,17,18 9:3,16 10:14,25,27 14:22 15:3 18:25 19:11,21 22:10 24:2,8 25:25	USERS 26:3 30:10,17,22	WRONG 18:14,17 27:13,14
TOLD 12:15 19:25 20:5	UTILIZING 29:8	WRONGFUL 18:8,11
TOOL 28:9 34:4	<hr/> V <hr/>	<hr/> Y <hr/>
TOP-NOTCH 19:22	VALID 12:20	YEARS 15:25
TOPIC 11:5 29:21	VARIETY 7:13	YESTERDAY 20:6
TORT 12:1 26:26	VAST 8:8	YOUNG 29:19
TORTIOUS 17:14 18:14		<hr/> Z <hr/>
		ZOOM 25:26

