

1 Geoffrey Graber, SBN 211547
2 ggraber@cohenmilstein.com
3 COHEN MILSTEIN SELLERS & TOLL PLLC
4 1100 New York Avenue NW, Ste. 800
5 Washington, DC 20005
6 T: 202-408-4600

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David W. Slayton,
Executive Officer/Clerk of Court,
By M. Aguirre, Deputy Clerk

7 Leslie M. Kroeger, (Pro Hac Vice application pending)*
8 lkroeger@cohenmilstein.com
9 11780 US Highway One, Suite N500
10 Palm Beach Gardens, FL 33408
11 T: 561-515-1400
12 Attorneys for Plaintiffs

13 **IN THE SUPERIOR COURT OF CALIFORNIA**
14 **COUNTY OF LOS ANGELES**

15 LAUREN NICHOLE ROOK, Individually and
16 as Administrator Ad Litem for the Estate of
17 LONNA MARIE ROOK; and JESSICA
18 NICOLE ROBLES, Individually

19 Plaintiffs,

20 v.

21 TIKTOK, LTD; TIKTOK, LLC; TIKTOK,
22 INC; BYTEDANCE, LTD.; BYTEDANCE,
23 INC; META PLATFORMS, INC.;
24 INSTAGRAM, LLC; FACEBOOK
25 PAYMENTS, INC.; SICULUS, INC.;
26 FACEBOOK OPERATIONS, LLC,
27 FACEBOOK HOLDINGS, LLC; SNAP, INC;
28 GOOGLE LLC; YOUTUBE, LLC
ALPHABET, INC; and DOES 1-100,
INCLUSIVE,

Defendant(s).

CIVIL ACTION NO. **25STCV33579**

COMPLAINT FOR PERSONAL
INJURY; WRONGFUL DEATH AND
SURVIVAL ACTION

DEMAND FOR JURY TRIAL

1 **I. INTRODUCTION**

2 1. American children are suffering an unprecedented mental health crisis fueled by
3 Defendants’ addictive and dangerous social media products.

4 2. In the past decade, Americans’ engagement with social media grew exponentially,
5 nowhere more dramatically than among our country’s youth. That explosion in usage is no accident.
6 It is the result of Defendant(s) META PLATFORMS, INC., INSTAGRAM, LLC. FACEBOOK
7 PAYMENTS, INC., SICULUS, INC., FACEBOOK OPERATIONS, LLC (collectively, “Meta”);
8 SNAP, INC. (“Snap”); BYTEDANCE, LTD., BYTEDANCE, INC, TIKTOK, LTD., TIKTOK,
9 LLC, TIKTOK, INC. (collectively, “ByteDance” or “TikTok”); GOOGLE LLC; YOUTUBE, LLC
10 (collectively, “Google” or “YouTube”); studied efforts to induce young people to compulsively use
11 their platforms and products. Borrowing heavily from the behavioral and neurobiological techniques
12 used by slot machines and exploited by the cigarette industry, Defendants deliberately embedded in
13 their products an array of design features aimed at maximizing youth engagement to drive
14 advertising revenue. Defendants know children are in a developmental stage that leaves them
15 particularly vulnerable to the addictive effects of these features. Defendants target them anyway, in
16 pursuit of additional profit.

17 3. The defects in Defendants’ products vary by platform, but all exploit children and
18 adolescents. They include but are not limited to an algorithmically-generated, endless feed to keep
19 users scrolling in an induced “flow state;” “intermittent variable rewards” that manipulate dopamine
20 delivery to intensify use; “trophies” to reward extreme usage; metrics and graphics to exploit social
21 comparison; incessant notifications that encourage repetitive account checking by manufacturing
22 insecurity; inadequate, essentially illusory age verification protocols; and deficient tools for parents
23 that create the illusion of control.

24 4. The resulting ubiquity of Defendants’ products in the lives and palms of our kids, and
25 the ensuing harm to them, is hard to overstate. Today, over a third of 13 to 17-year-old kids report
26 using at least one of Defendants’ apps “almost constantly” and admit this is “too much.” Yet more
27 than half of these kids report that they would struggle to cut back on their social media use. Instead
28

1 of feeding coins into machines, kids are feeding Defendants’ platforms with an endless supply of
2 attention, time, and data.

3 5. Defendants’ choices have generated extraordinary corporate profits—and yielded
4 immense tragedy. Suicide rates for youth are up an alarming 57%. Emergency room visits for
5 anxiety disorders are up 117%. In the decade leading up to 2020, there was a 40% increase in high
6 school students reporting persistent sadness and hopelessness, and a 36% increase in those who
7 attempted to take their own lives. In 2019, one in five high school girls had made a suicide plan. In
8 2021, one in three girls seriously considered attempting suicide. Children and their parents and
9 guardians across the country have struggled to cope with the severe, lasting damage visited on their
10 families by anxiety, depression, addiction, eating disorders, self-harm, suicidality, and the loss of
11 outliving one’s child.

12 6. This lawsuit follows on a growing body of scientific research, including Defendants’
13 own internal (previously concealed) studies, that draws a direct line between Defendants’ conscious,
14 intentional design choices and the youth mental health crisis gripping our nation. Defendants and
15 their products have rewired how our kids think, feel, and behave. Disconnected “Likes” have
16 replaced the intimacy of adolescent friendships. Mindless scrolling has displaced the creativity of
17 play and sport. While presented as “social,” Defendants’ products have in myriad ways promoted
18 disconnection, disassociation, and a legion of resulting mental and physical harms.

19 7. The U.S. Surgeon General recently explained that children versus Big Tech is “just not
20 a fair fight.”¹ “You have some of the best designers and product developers in the world who have
21 designed these products to make sure people are maximizing the amount of time they spend on these
22 platforms. And if we tell a child, use the force of your willpower to control how much time you’re
23 spending, you’re pitting a child against the world’s greatest product designers.”

24 8. Over the past decade, Defendants have relentlessly pursued a strategy of growth-at-all-
25 costs, recklessly ignoring the impact of their products on children’s mental and physical health and
26

27 ¹ Allison Gordon & Pamela Brown, *Surgeon General says 13 is ‘too early’ to join social media*, CNN (Jan. 29, 2023),
28 <https://www.cnn.com/2023/01/29/health/surgeon-general-social-media/index.html>. Exhibits and referenced materials
are incorporated in this *Master Complaint* as if fully stated herein.

1 well-being. In a race to corner the “valuable but untapped” market of tween and teen users, each
2 Defendant designed product features to promote repetitive, uncontrollable use by kids.²

3 9. Adolescents and children are central to the Defendants’ business models. These age
4 groups are highly connected to the Internet, more likely to have social media accounts, and more
5 likely to devote their downtime to social media usage. Additionally, youth influence the behavior
6 of their parents and younger siblings. As one Defendant put it, “los[ing] the teen foothold in the
7 U.S.” would mean “los[ing] the pipeline” for growth.³

8 10. Recognizing the power of engaging young users, Defendants deliberately tweaked the
9 design and operation of their apps to exploit the psychology and neurophysiology of kids. Because
10 children’s and adolescents’ brains are not fully developed, they lack the same emotional maturity,
11 impulse control, and psychological resiliency as adults. As a result, they are uniquely susceptible to
12 addictive features in digital products and highly vulnerable to the consequent harms. Knowing this,
13 Defendants wrote code designed to manipulate dopamine release in children’s developing brains
14 and, in doing so, create compulsive use of their apps.

15 11. Defendants’ strategy paid off. Users of their products now number in the billions, and
16 the frequency and time spent by these users has grown exponentially. This has allowed Defendants
17 to harvest a vast amount of personal user data—from the school you attend, to the sneakers you
18 covet, to the places you’ve been and the people you’ve met. This, in turn, has allowed Defendants
19 to mint a fortune, by selling to others the ability to micro-target advertisements to incredibly narrow
20 slices of the public.⁴

21 12. Defendants’ growth has come at the expense of its most vulnerable users: children
22 around the world, including Plaintiffs, who they cultivated and exploited. Plaintiffs are not merely
23 the collateral damage of Defendants’ products. They are the direct victims of the intentional product

24
25 ² Georgia Wells & Jeff Horwitz, *Facebook’s Effort to Attract Preteens Goes Beyond Instagram Kids, Documents Show*, Wall St. J. (Sept. 28, 2021), <https://www.wsj.com/articles/facebook-instagram-kids-tweens-attract-11632849667>; see also Haugen_00022339.

26 ³ Sheera Frenkel et al., *Instagram Struggles with Fears of Losing Its ‘Pipeline’: Young Users*, N.Y. Times (Oct. 26, 2021), available at <https://www.nytimes.com/2021/10/16/technology/instagram-teens.html>.

27 ⁴ See Snap, Inc., 2022 Annual Report (Form 10-K) at 15 (Jan. 31, 2023) (“[W]e rely heavily on our ability to collect and disclose data[] and metrics to our advertisers so we can attract new advertisers and retain existing advertisers. Any
28 restriction or inability, whether by law, regulation, policy, or other reason, to collect and disclose data and metrics which our advertisers find useful would impede our ability to attract and retain advertisers.”).

1 design choices made by each Defendant. They are the intended targets of the harmful features that
2 pushed them into self-destructive feedback loops.

3 13. As a direct result of Defendants’ successful promotion of their defective products, the
4 rates of mental health issues among children have climbed steadily since 2010. By 2018, suicide
5 was the second leading cause of death for youth.⁵

6 14. Weeks later, the U.S. Surgeon General issued an advisory “to highlight the urgent need
7 to address the nation’s youth mental health crisis.”⁶ In a scathing rebuke of the assault on our
8 children, the Surgeon General recognized the dangerous designs in Defendants’ products and
9 Defendants’ abdication of responsibility for the resulting harms:

10 In these digital public spaces, which are privately owned and tend to be run for profit,
11 there can be tension between what’s best for the technology company and what’s
12 best for the individual user or for society. Business models are often built around
13 maximizing user engagement as opposed to safeguarding users’ health and ensuring
14 that users engage with one another in safe and healthy ways
15 **[T]echnology companies must step up and take responsibility for creating a safe
16 digital environment for children and youth.** Today, most companies are not
17 transparent about the impact of their products, which prevents parents and young
18 people from making informed decisions and researchers from identifying problems
19 and solutions.⁷

20 15. The Surgeon General’s comments were echoed by former President Biden himself. In
21 both his 2022 and 2023 State of the Union Addresses, President Biden urged the nation to “hold
22 social media platforms accountable for the national experiment they’re conducting on our children
23 for profit.”⁸ In a January 11, 2023 op-ed, Mr. Biden amplified this point: “The risks Big Tech poses
24 for ordinary Americans are clear. Big Tech companies collect huge amounts of data on the things
25 we buy, on the websites we visit, on the places we go and, most troubling of all, on our children.”⁹
26 The President observed that “millions of young people are struggling with bullying, violence, trauma

23 ⁵ CDC, *Deaths: Leading Causes for 2018*, 70(4) National Vital Statistics Reports at 10 (May 17, 2021),
24 <https://www.cdc.gov/nchs/data/nvsr/nvsr70/nvsr70-04-508.pdf>.

24 ⁶Press Release, U.S. Dep’t Health & Hum. Servs., *U.S. Surgeon General Issues Advisory on Youth Mental Health
25 Crisis Further Exposed by COVID-19 Pandemic* (Dec. 7, 2021), [https://www.hhs.gov/about/news/2021/12/07/us-
26 surgeon-general-issues-advisory-on-youth-mental-health-crisis-further-exposed-by-covid-19-pandemic.html](https://www.hhs.gov/about/news/2021/12/07/us-surgeon-general-issues-advisory-on-youth-mental-health-crisis-further-exposed-by-covid-19-pandemic.html).

25 ⁷ U.S. Surgeon General’s Advisory, *Protecting Youth Mental Health* (Dec. 7, 2021),
26 <https://www.hhs.gov/sites/default/files/surgeon-general-youth-mental-health-advisory.pdf> (emphasis in original).

26 ⁸ The White House, President Biden’s State of the Union Address (Mar. 1, 2022), [https://www.whitehouse.gov/state-
27 of-the-union-2022/](https://www.whitehouse.gov/state-of-the-union-2022/); see also The White House, *President Biden’s State of the Union Address* (Feb. 7, 2023),
28 <https://www.whitehouse.gov/state-of-the-union-2023/>.

27 ⁹ Joe Biden, *Republicans and Democrats, Unite Against Big Tech Abuses*, Wall St. J. (Jan. 11, 2023),
28 [https://www.wsj.com/articles/unite-against-big-tech-abuses-social-media-privacy-competition-antitrust-children-
algorithm-11673439411](https://www.wsj.com/articles/unite-against-big-tech-abuses-social-media-privacy-competition-antitrust-children-algorithm-11673439411).

1 and mental health” as a result of Defendants’ conduct and products, and again stated that “[w]e must
2 hold social-media companies accountable” for their role in this crisis.¹⁰

3 16. These statements by President Biden and the Surgeon General are in line with a
4 substantial body of peer-reviewed scientific literature documenting the harmful impact that
5 Defendants’ apps have on our children, including the various injuries suffered by Plaintiffs. This
6 body of research demonstrates that Defendants’ defectively designed products can cause the harms
7 Plaintiffs suffer: addiction, compulsive use, anxiety, depression, eating disorders, body dysmorphia,
8 self-harm, sexual exploitation, suicidal ideations, other serious diseases and injuries, and suicide
9 itself. Overall rates of these disorders have increased greatly because of widespread consumption of
10 Defendants’ products by children in this country and across the world.

11 17. Defendants knew or should have known about the risks of such addiction—which at
12 least one Defendant euphemistically calls “problematic use.” They could have changed their
13 products to avoid the harm. They could have warned the public and Plaintiffs about the danger.
14 Instead, Defendants placed growth first.

15 18. Plaintiffs, Lauren Nichole Rook, individually and Jessica Nicole Robles, individually
16 bring this action for personal injuries against Defendants for harm caused because of use of
17 Defendants’ platforms and wrongful conduct, including: (a) designing defective products that
18 caused serious injuries to users; (b) failing to provide adequate warnings about serious and
19 reasonably foreseeable health risks from use of the products; (c) failing to utilize reasonable care in,
20 among other things, developing, designing, managing, operating, testing, producing, labeling,
21 marketing, advertising, promoting, controlling, selling, supplying, and distributing their products;
22 and (d) engaging in the deliberate concealment, misrepresentation, and obstruction of public
23 awareness of serious health risks to users of its products.

24 19. Plaintiff, Lauren Nichole Rook also brings this action as administrator ad litem for the
25 estate of Lonna Marie Rook for the wrongful death and survival action against the Defendants for
26

27 ¹⁰ Joe Biden, *Republicans and Democrats, Unite Against Big Tech Abuses*, Wall St. J. (Jan. 11, 2023),
28 [https://www.wsj.com/articles/unite-against-big-tech-abuses-social-media-privacy-competition-antitrust-children-
algorithm-11673439411](https://www.wsj.com/articles/unite-against-big-tech-abuses-social-media-privacy-competition-antitrust-children-algorithm-11673439411).

1 harm caused because of use of Defendants’ platforms and wrongful conduct.

2 **II. THE PARTIES**

3 **A. PLAINTIFF**

4 20. This Complaint is filed by 2 plaintiffs from different states in the U.S. It is filed by
5 a 23 year old adult and by next of kin and administrator ad litem for the estate of a deceased minor
6 who suffered personal injuries due to their use of Defendants’ products and, where applicable, their
7 parents, guardians, spouses, children, siblings, and close family members, who suffered medical
8 expenses, loss of services, loss of society and other injuries as a consequence of the harms to
9 Plaintiffs (collectively, “Plaintiffs”).

10 21. Plaintiffs have suffered various personal injuries because of their use of Defendants’
11 products. Plaintiffs have been harmed as a direct and proximate result of Defendants’ wrongful
12 conduct. These harms include pain, suffering, disability, impairment, disfigurement, death, an
13 increased risk of injury and other serious illnesses, loss of enjoyment of life, loss of society,
14 aggravation or activation of preexisting conditions, scarring, inconvenience, incurred costs for
15 medical care and treatment, loss of wages and wage-earning capacity, and other economic and non-
16 economic damages, as set forth herein. These losses are often permanent and continuing in nature.

17 22. Plaintiffs expressly disaffirm any contract they may have made with Defendants, or
18 that Defendants may claim they made with them, before reaching the age of majority, as they lacked
19 capacity to contract.

20 23. Plaintiffs also expressly disaffirm any contract they may have made with any of the
21 Defendants, or that Defendants may claim they made with them, after reaching the age of majority,
22 because Plaintiffs continued use of Defendants’ products was compulsive and due to addiction, not
23 an affirmation of any contract.

24 **B. DEFENDANTS**

25 24. The defendants identified in this section are collectively referred to as “Defendants”
26 throughout this Complaint.

27
28

1 **1. Meta**

2 25. Defendant Meta Platforms, Inc. (“Meta Platforms”) is a Delaware corporation and
3 multinational technology conglomerate. Its principal place of business is in Menlo Park, CA.

4 26. Meta Platforms’ subsidiaries include, but may not be limited to, the entities identified
5 in this section, as well as a dozen others whose identity or involvement is presently unclear.

6 27. Defendant Facebook Payments, Inc. (“Facebook 1”) is a wholly owned subsidiary of
7 Meta Platforms that was incorporated in Florida on December 10, 2010. Facebook 1 manages,
8 secures, and processes payments made through Meta Platforms, among other activities. Its principal
9 place of business is in Menlo Park, CA.

10 28. Defendant Siculus, Inc. (“Siculus”) is a wholly owned subsidiary of Meta Platforms
11 that was incorporated in Delaware on October 19, 2011. Siculus constructs data facilities to support
12 Meta Platforms’ products. Its principal place of business is in Menlo Park, CA.

13 29. Defendant Facebook Operations, LLC (“Facebook 2”) is a wholly owned subsidiary
14 of Meta Platforms that was incorporated in Delaware on January 8, 2012. Facebook 2 is likely a
15 managing entity for Meta Platforms’ other subsidiaries. Meta Platforms is the sole member of this
16 LLC, whose principal place of business is in Menlo Park, CA.

17 30. Defendant Instagram, LLC (“Instagram, LLC”) launched an app called Instagram in
18 October 2010. On or around April 7, 2012, Meta Platforms purchased Instagram, LLC for over one
19 billion dollars and reincorporated the company in Delaware. Meta Platforms is the sole member of
20 this LLC, whose principal place of business is in Menlo Park, CA.

21 31. Meta Platforms, Instagram, Siculus, Facebook 1, and Facebook 2 are referred to jointly
22 as “Meta.”

23 32. Meta owns, operates, controls, produces, designs, maintains, manages, develops, tests,
24 labels, markets, advertises, promotes, supplies, and distributes digital products available through
25 mobile- and web-based applications (“apps”), including Instagram and Facebook (together, “Meta
26 products”); Messenger; and Messenger Kids, as well as well as the virtual reality (VR) headset,
27 Oculus. Meta’s apps and devices are widely distributed to consumers throughout the United States.

28

1 **2. Snap**

2 33. Defendant Snap, Inc. (“Snap”) is a Delaware corporation. Its principal place of
3 business is in Santa Monica, CA.

4 34. Snap owns, operates, controls, produces, designs, maintains, manages, develops, tests,
5 labels, markets, advertises, promotes, supplies, and distributes the app Snapchat. Snapchat is widely
6 available to consumers throughout the United States.

7 **3. ByteDance**

8 35. Defendant ByteDance Ltd. is a global company incorporated in the Cayman Islands.
9 Its principal place of business is in Beijing, China. ByteDance Ltd. also maintains offices in the
10 United States, Singapore, India, and the United Kingdom, among other locations.

11 36. ByteDance Ltd. wholly owns its subsidiary Defendant ByteDance Inc., a Delaware
12 corporation whose principal place of business is in Mountain View, CA.

13 37. ByteDance Ltd.’s key Chinese subsidiary is Beijing Douyin Information Service
14 Limited, f/k/a Beijing ByteDance Technology Co. Ltd. (“Beijing ByteDance”).¹¹ Beijing
15 ByteDance owns, operates, and holds key licenses to Douyin, the Chinese version of TikTok. On or
16 around April 30, 2021, the Chinese government took a 1% stake in, and received one of three seats
17 on the board of directors of, Beijing ByteDance.¹² Specifically, 1% of Beijing ByteDance is now
18 owned by WangTouZhongWen (Beijing) Technology, which in turn is owned by China Internet
19 Investment Fund (China’s top Internet regulator and censor), China Media Group (China’s national
20 broadcaster, controlled by the Chinese Communist Party’s propaganda department), and the Beijing
21 municipal government’s investment arm.

22 38. ByteDance Ltd. wholly owns its subsidiary Defendant TikTok, Ltd., a Cayman Island
23 corporation with its principal place of business in Shanghai, China.

24 39. TikTok, Ltd. wholly owns its subsidiary Defendant TikTok, LLC which is, and at all
25

26 ¹¹ See Sophie Webster, *ByteDance Changes Names of Subsidiaries to Douyin, Speculated to be Mulling an IPO*, Tech
27 Times (May 8, 2022), available at <https://www.techtimes.com/articles/275188/20220508/bytedance-changes-names-subsidiaries-douyin-speculated-mulling-ipo.htm>.

28 ¹² See Juro Osawa & Shai Oster, *Beijing Tightens Grip on ByteDance by Quietly Taking Stake, China Board Seat*, The Information (Aug. 16, 2021), available at <https://www.theinformation.com/articles/beijing-tightens-grip-on-bytedance-by-quietly-taking-stake-china-board-seat?rc=ubpjcg>.

1 relevant times was, a Delaware limited liability company.

2 40. TikTok, LLC wholly owns its subsidiary Defendant TikTok, Inc. f/k/a Musical.ly, Inc.
3 (“TikTok, Inc.”), a California corporation with its principal place of business in Culver City, CA.

4 41. Defendants TikTok, Ltd.; TikTok, LLC; TikTok, Inc.; ByteDance Ltd.; and ByteDance
5 Inc. are referred to jointly as “ByteDance.”

6 42. ByteDance owns, operates, controls, produces, designs, maintains, manages, develops,
7 tests, labels, markets, advertises, promotes, supplies, and distributes the app TikTok. TikTok is
8 widely available to consumers throughout the United States.

9 **4. Google**

10 43. Google Inc. was incorporated in California in September 1998 and reincorporated in
11 Delaware in August 2003. In or around 2017, Google Inc. converted to a Delaware limited liability
12 company, Defendant Google, LLC (together with its predecessor-in-interest Google Inc.,
13 “Google”). Google’s principal place of business is in Mountain View, CA.

14 44. Since 2006, Google has operated, done business as, and wholly owned as its subsidiary
15 Defendant YouTube, LLC (“YouTube, LLC”). YouTube, LLC is a Delaware limited liability
16 company with its principal place of business in San Bruno, CA. YouTube is widely available to
17 consumers throughout the United States.¹³

18 45. On October 2, 2015, Google reorganized and became a wholly owned subsidiary of a
19 new holding company, Alphabet Inc., a Delaware corporation with its principal place of business in
20 Mountain View, CA.

21 46. Google, LLC and YouTube, LLC (together, “Google”) are alter egos of one another:
22 together and in concert they own, operate, control, produce, design, maintain, manage, develop, test,
23 label, market, advertise, promote, supply, and distribute the app YouTube.

24 **III. JURISDICTION AND VENUE**

25 47. This Court has personal jurisdiction over Defendants because they are incorporated in
26 and have their principal places of business in California, and because they have contacts with

27 _____
28 ¹³ See, e.g., Alphabet Inc., *Form 10-Q*, Oct. 25, 2022, at 4 (defining Alphabet as “Alphabet Inc. and its subsidiaries.”),
available at <https://www.sec.gov/Archives/edgar/data/1652044/000165204422000090/goog-20220930.htm>.

1 California that are so continuous and systematic that they are essentially at home in this state. All
2 Defendants regularly conduct and solicit business in California, provide products and/or services by
3 or to persons here, and derive substantial revenue from the same. All Defendants affirmatively and
4 extensively engage with a significant percentage of this State’s residents through messages,
5 notifications, recommendations, and other communications.

6 48. There is no federal jurisdiction in this case. All claims are brought pursuant to
7 California state law. There are no federal causes of action and Plaintiff expressly disclaim any
8 federal causes of action.

9 49. Venue is proper in Los Angeles County because one or more defendants are
10 headquartered here and/or one or more Plaintiffs reside here; in addition, Plaintiffs will be relating
11 this case to and filing a Short Form Complaint in Judicial Council Coordination Proceeding No.
12 5255 (“JCCP 5255”), which proceeding is pending in Los Angeles County.

13 **IV. FACTUAL ALLEGATIONS SPECIFIC TO EACH DEFENDANT**

14 **A. GENERAL FACTUAL ALLEGATIONS APPLICABLE TO ALL DEFENDANTS**

15 50. On May 15, 2023, a Master Complaint was filed in JCCP 5255, on May 15, 2023
16 (“Master Complaint”), in Los Angeles County Superior Court. Plaintiffs hereby incorporate and
17 adopt Sections IV.A.1 through IV.A.7 of the Master Complaint as though set forth in full herein.

18 **B. FACTUAL ALLEGATIONS AS TO META**

19 51. Plaintiffs hereby incorporate and adopt Section IV.B (and all applicable subsections)
20 of the Master Complaint as though set forth in full herein.

21 **C. FACTUAL ALLEGATIONS AS TO SNAP**

22 52. Plaintiffs hereby incorporate and adopt Section IV.C (and all applicable subsections)
23 of the Master Complaint as though set forth in full herein.

24 **D. FACTUAL ALLEGATIONS AS TO TIKTOK**

25 53. Plaintiffs hereby incorporate and adopt Section IV.D (and all applicable subsections)
26 of the Master Complaint as though set forth in full herein.

27
28

1 **E. FACTUAL ALLEGATIONS AS TO GOOGLE**

2 54. Plaintiffs hereby incorporate and adopt Section IV.E (and all applicable
3 subsections) of the Master Complaint as though set forth in full herein.

4 **V. PLAINTIFFS SPECIFIC FACTUAL ALLEGATIONS**

5 **A. Lonna Marie Rook (2010 – 2024)**



14 55. Plaintiff, Lauren Nichole Rook, individually and as the administrator ad litem for the
15 estate of Lonna Marie Rook, asserts claims against Meta Platforms/Facebook, Snap Inc, TikTok
16 LLC, Bytedance Ltd., Instagram, LLC, Google Inc., and YouTube LLC.

17 56. Lonna was 14 years old and lived in Shelby County, Tennessee.

18 57. Lonna began using the Instagram platform in or around 2018, when she was 8. She
19 would watch Anime and Tian Long Ba Bu series on Defendants’ platforms, and the family believed
20 it was safe for kids. Lonna began using YouTube in or around 2018 when she was 8, Facebook in
21 or around 2019 when she was 9, TikTok in or around 2020, when she was 10, and Snapchat in or
22 around 2022, when she was 12.

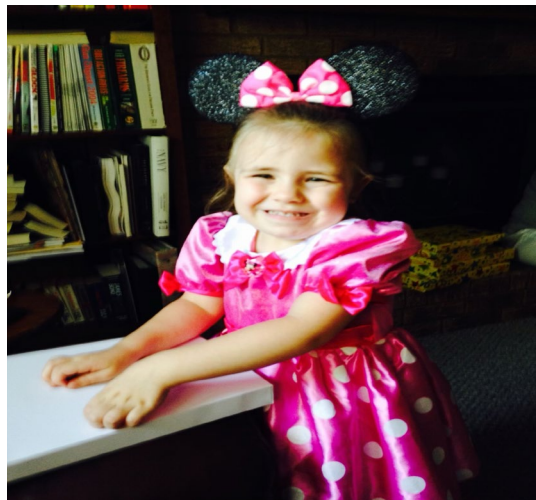
23 58. Lonna’s use of Defendants’ platforms coincided with the decline in her mental
24 health.

25 59. Lonna was a funny child, she loved her family and was a good big sister to her 3
26 brothers. When they were babies, she would feed her twin siblings and rock them to sleep. That was
27 her favorite thing to do; she loved to take care of her brothers. She was a doting big sister to her
28 young siblings. Lonna had ambitions for her life; she wanted to go to college to be a forensic scientist

1 when she grew up. She enjoyed going outside and loved playing soccer. She loved art and loved to
2 draw. Art was her favorite subject in school; she took advanced art in 7th grade. When her mental
3 health began to decline, she initially used art and drawing as a coping mechanism. She loved music,
4 loved to paint, and was very talented. She got along with everybody and was easy to talk to. Lonna's
5 grandparents and Lauren have memories of the bond they shared. Lonna's grandparents loved and
6 cared for her, she meant the world to them, Lonna was their sunshine. Lonna's grandparents have
7 wonderful memories of when they took Lonna to Disney World when she was six years old, they
8 remember Lonna being happy and feeling loved.

9 60. Lonna was a good student until her mental health began to decline because of her
10 addiction to Defendants' products. Her grades were As' and Bs'.

11 61. Above all, she lived her life with kindness and empathy. Lauren remembers when
12 Lonna was 4 years old, and she noticed a homeless woman on the street. Lonna asked Lauren why
13 the woman looked untidy and unclean. Lauren told her it was because she was homeless. Lonna
14 couldn't imagine anyone being homeless; she told Lauren that if she could have a home, everyone
15 should be able to have a home. She wanted to know what she could do to help the homeless woman.
16 Lonna's kind heart grew bigger as she got older. She was loyal, caring, and was the first one to help
17 a friend or classmate through a difficult situation, even though she may have been going through
18 difficulties herself. That was how Lonna lived her life.



27 62. But after she began using the Defendants' products, everything changed.

28

1 63. Lonna began to withdraw from her family and friends. The family attributed the
2 change to adolescence and felt they needed to give her space. Lonna started having difficulty
3 sleeping, awake until 2 or 3 am many nights. Neither Lauren nor Lonna knew what was causing
4 the sleep impairment. At this juncture, Lonna wanted to spend every waking moment on social
5 media using the Defendants’ platforms. Lonna became withdrawn, depressed, and began to self-
6 harm by cutting. Lauren found out about the cutting via a social media post by Lonna on Snapchat,
7 in which she commented about cutting herself. Lonna watched other kids on the Defendants’
8 platforms cutting themselves. She said kids did it to relieve anxiety, to distract from the pain inside.
9 Lonna said she did it when she felt she was losing control. By age 10, Lonna had cut herself several
10 times and had attempted suicide 3 times. At 11, Lonna was admitted to a behavioral health facility
11 for “major depression and suicide ideation with a plan to cut herself with a knife”. She was put on
12 mood stabilizers, antidepressants, and anti-psychosis medication. Lonna followed the doctors’
13 recommendations for therapy after her hospitalization. Lonna went to therapy for almost two years.

14 64. Lonna was bullied constantly on the Defendants’ platforms. She was called ugly, told
15 she was no good, and that no one wanted to be her friend. The bullying took a toll on Lonna’s mental
16 health; it changed her. When she was 12, Lonna was admitted again to a residential treatment
17 facility, where she was held for several weeks and treated for self-harm by cutting and attempted
18 suicide. She ended up finishing out the school year at a different school because students at her
19 school had begun to speculate about her long absence. By her birthday in June 2024, Lonna had lost
20 interest in everything, she began to withdraw from everything and everyone, she just wanted to be
21 on the Defendants’ platforms all the time and she couldn’t stop or control it. She quit art, which she
22 loved, she quit band where she played the clarinet, and Lonna, a good student, began to fail her
23 classes. She was caught in school piercing her nose and was sent home for cutting herself on school
24 premises. She continued to cut herself and to hide the cuts; she did it in less visible parts of her body,
25 such as her inner legs and thighs. Without Lauren’s knowledge or consent, Lonna was being targeted
26 with extreme and harmful self-harm content. Such content was selected and promoted as a means
27 of increasing Lonna’s engagement with the Defendants’ social media products. The Defendants
28 could have made their products safer for minors like Lonna by simply not targeting them with

1 algorithms. Lonna developed an eating disorder; she ate and purged for weeks at a time. She lost
2 interest in school and had anxiety about going to school. Lonna's therapists implemented safety
3 plans and reinforced coping skills, but ultimately, no one was able to help Lonna because no one
4 except the Defendants understood that the source of her harm was her addiction to the Defendants'
5 platforms.

6 65. Lonna became increasingly isolated and was spending most of her time on the
7 Defendants' platforms. Lonna's family learned over time, that the Defendants designed and
8 distributed their products to underage children in a way that was impossible to stop. It was a game
9 of cat and mouse, and Lonna's family was battling the most sophisticated tech companies in the
10 world.

11 66. Lonna's family did everything in their power to block Lonna's access to the
12 Defendants' platforms but every time, the Defendants made back doors available to Lonna. They set
13 parental controls on Lonna's devices, including tools that should have blocked access to certain
14 applications, but Lonna found ways around them, including getting on a VPN or a proxy network,
15 using her school-issued computer. When the wi-fi at home was turned off, Lonna used the
16 neighbor's wi-fi or she used through friends in the neighborhood. Lonna always found a way to use
17 the Defendants' platforms in school. Even though the school restricted the use of personal devices
18 but like many students, Lonna found ways around controls that were in place. Lonna continued
19 using, and her family simply had no way to stop the Defendants.

20 67. Lonna accessed and used the Defendants' products through a personal computer and
21 through her school-issued device. Lonna's family came to realize that no matter how hard the school
22 tried to block access to the Defendants' applications via software or administrator controls, someone
23 simply develops new software or finds a new method to bypass those protections.

24 68. In the case of YouTube, the application comes pre-installed on many smart TVs and
25 similar types of devices, and to Lauren's knowledge, it is designed to be impossible to ban,
26 permanently delete, or effectively block from these types of electronics.

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1 69. The Defendants blame parents for the harm for which they are responsible while
2 simultaneously stripping parents of the ability to effectively protect their children from potential
3 danger and harm.

4 70. Most serious of all, because of the harmful dependencies designed and aimed at
5 Lonna, her family’s efforts to protect Lonna by restricting access to the Defendants' platforms only
6 inflamed and worsened the situation. Lonna simply could not handle her phone being taken away.
7 No matter what Lauren and the family said or did, Lonna and the Defendants were always a step
8 ahead.

9 71. The Defendants ensured that Lauren could not make informed choices about the
10 health and safety of Lonna. The Defendants marketed their products as safe, fun, and appropriate
11 for children. Lauren relied on those representations; she could not have reasonably foreseen that the
12 Defendants’ platforms came with the risk of addiction and potential harm.

13 72. Lauren gave Lonna safety education about everyday dangers, but Lauren had no way
14 of knowing that the Defendants’ products came with inherent risks and potential danger for Lonna.
15 Had the Defendants provided adequate warning regarding potential dangers associated with the use
16 of their products, the family would not have allowed a smartphone or any of the Defendants’
17 platforms in the home or in Lonna’s hands. Lonna is survived by three younger siblings who will
18 not be allowed to have access to a phone or the Defendants’ platforms for a long time to come.

19 73. As the foreseeable result of Defendants’ extended use designs and other defective
20 and/or inherently harmful designs and actions, Lonna developed harmful dependencies on these
21 platforms, resulting in sleep impairment, eating disorders, depression, anxiety, social isolation,
22 attempted self-harm, self-harm by way of cutting, suicidal thoughts, suicidal ideation, attempted
23 suicide, and other serious mental health harm not experienced prior to when such use began,
24 including and ultimately, death by suicide.

25 74. The Defendants targeted Lonna with Artificial Intelligence (AI) driven user
26 recommendation tools, AI-driven feed-based tools, and harmful social comparison and social
27 rewards tools and features.

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1 75. Lonna did not seek out or want the harmful dependencies that ensued due to the
2 Defendants’ harmful behavior. The Defendants reasonably foresaw and intended this outcome when
3 designing, programming, and operating their products.

4 76. Lonna became upset whenever her phone was taken away or when she was asked to
5 complete her homework. She would yell out statements such as: “I’m not going to live long,
6 anyway,” “I want to die,” and “nothing is important anymore.” She went to therapy and took
7 antidepressants, but she continued to have suicidal thoughts. After her residential treatment in 2022,
8 part of the safety plan was to stay away from social media, and when she was released, Lauren and
9 Lonna’s grandmother made sure she stayed away for as long as they were able to keep her away. As
10 soon as she got her phone back, the first thing she did was to use the Defendants’ platforms. As
11 Lonna’s usage of the Defendants’ platforms continued, so did the unhealthy and harmful behavior,
12 resulting in harm to her mental and physical health. Lauren became increasingly concerned,
13 confused, and helpless as to how to help Lonna overcome her addiction; it was overwhelming for
14 their family. But for the Defendants’ failure to conduct reasonable age, identity, and parental consent
15 verification, Lonna would not have been exposed to the Defendants’ inherently dangerous and
16 defective features and design. At all times, the Defendants knew or should have reasonably known
17 that Lonna was a young user.

18 77. But for the Defendants’ endless feed based on what algorithms determined would
19 best keep Lonna engaged and addicted, Lonna would not have self-harmed or ultimately died by
20 suicide. The harm Lonna suffered was entirely preventable, but the Defendants, in their quest for
21 huge profits, ignored the health and safety of their young users like Lonna.

22 78. Unbeknownst to Lauren, Lonna started to give away some of her cherished
23 possessions in late 2024. On December 22, 2024, just 3 days before Christmas, at home at Lonna’s
24 grandmother’s, Lauren had injured a fingernail and went to get the first-aid kit from the bathroom.
25 She tried to open the door, then realized Lonna was in there. Lonna cracked the door open just long
26 enough to hand Lauren what she needed. They exchanged “I love yous” and Lonna shut the
27 bathroom door. Not long after, Lauren heard Lonna’s footsteps in the hallway, then heard the
28 bathroom door slam shut. Almost immediately, the whole family heard a sound they all thought was

1 a shelf falling in Lonna's room. Lauren searched for Lonna while the rest of the family tried to
2 figure out what the noise was. Lauren tried to open the bathroom door, but it was locked. Panicked,
3 Lauren called out Lonna's name and asked her to open the door, but there was no response. Lauren's
4 stepfather forcefully opened the bathroom door, and they found Lonna's body on the bathroom floor,
5 lifeless. Lonna had taken her own life by a self-inflicted gunshot wound to the head, as the result of
6 mental health harm inflicted by Defendants' defective and/or inherently dangerous features and
7 designs.

8 79. Lonna was 14 at the time of her death by suicide. She never got to drive a car, never
9 got to vote, and never got to experience a love relationship. She had written in her journal that she
10 "just wanted the pain to end."

11 80. The Defendants track usage data and knew what type of content was being pushed
12 to Lonna, as well as the amount of time Lonna was spending on their platforms. The Defendants
13 deliberately program their technologies to increase engagement and are aware that harmful content
14 is being pushed to young users like Lonna. The Defendants took this risk without Lauren's
15 knowledge or consent.

16 81. As a result of Defendants' questionable marketing practices and defective
17 algorithms, Lonna became depressed, self-harmed, and attempted suicide many times, requiring
18 hospitalization, and ultimately died by suicide.

19 82. As a result of the Defendants' dangerous products, failure to warn, and negligence,
20 Lonna suffered from depression, self-harm, eating disorder, sleep disorder, suicide attempts and
21 ultimately, death by suicide.

22 83. As a result of the Defendants' dangerous products, failure to warn, and negligence,
23 Lonna suffered loss, including but not limited to bodily injury, past medical expenses, a shortened
24 life expectancy, loss of ability to earn, and loss of capacity of the enjoyment of life.

25 84. Lauren did not know or have reason to know about Defendants' defective and/or
26 inherently dangerous products, features, and/or tools, or that Defendants were using such products,
27 features, and/or tools in an exploitative and harmful manner. Defendants' knowing and deliberate
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1 product design, marketing, distribution, programming, and operational decisions and conduct
2 caused serious emotional, mental, and physical harm to Lonna.

3 **B. JESSICA NICOLE ROBLES**

4 85. Plaintiff, Jessica Nicole Robles asserts claims against the Meta Platforms/Facebook,
5 Snap Inc., TikTok, LLC, Bytedance Ltd., Instagram, LLC, Google Inc., and YouTube LLC.

6 86. Jessica “Jess” is 23 and lives in Hamilton County, Indiana.

7 87. Jessica was an independent and well-adjusted child. She was outgoing and always
8 happy to be around friends and family. Her goal was to join the military when she reached enlistment
9 age.

10 88. Jessica got her first cell phone when she was 12 years old, and her parents discussed
11 safety with her. She was told that the phone was for safety and communication purposes only and
12 they set parental controls. Jessica’s parents believed she was using the device responsibly and had
13 no reason to think otherwise.

14 89. When Jessica turned 12, many of her friends were on Facebook, Instagram, Snapchat,
15 Tik Tok and YouTube which they used for fun to post and watch videos as well as to interact with
16 friends. This was how these platforms advertised and marketed their products. The Defendants’
17 platforms represented that their products were safe, and that harmful content was not allowed. The
18 Defendants have the technology necessary to enforce user guidelines and ensure the safety of their
19 products as advertised, but they failed to do so because they know that enforcing safety rules will
20 result in lower user engagement.

21 90. Jessica is believed to have started using the Defendants’ platforms in or around 2014
22 when she was 12 years old, which coincides with the decline in her mental health. As the foreseeable
23 result of Defendants’ extended use designs and other defective and/or inherently harmful designs
24 and actions, Jessica developed harmful dependencies on these platforms, resulting in sleep disorder,
25 depression, anxiety, body dysmorphia, self-harm in the form of cutting, social isolation, suicidal
26 thoughts suicidal ideation and attempted suicide, and other serious mental health harms not
27 experienced prior to when such use began. At age 13, Jessica was diagnosed with depression and
28 anxiety, and at age 14, her treaters placed her on antidepressant and anti-anxiety medication.

1 91. The Defendants targeted Jessica with Artificial Intelligence (AI) driven user
2 recommendation tools, AI driven feed-based tools, and harmful social rewards tools and features.

3 92. Jessica’s use of the Defendants’ platforms resulted in a slow but steady decline in
4 her mental health. Jessica gradually went from being someone who was social and outgoing, to
5 someone who was quiet and withdrawn. Jessica spent increasing amount of time on the Defendants’
6 platforms and she began to lose interest in other activities, which is a foreseeable consequence of
7 the Defendants’ distribution of addictive products to a minor.

8 93. Unbeknownst to Jessica’s parents, Jessica, was being targeted with extreme and
9 harmful self-harm content. This was not content Jessica was searching for but content that was
10 selected and promoted as a means of increasing Jessica’s engagement with the Defendants’ social
11 media products. The Defendants could have made their product safer for minors such as Jessica by
12 simply not targeting them with their algorithms. Instead, they targeted Jessica without her parents’
13 knowledge or consent.

14 94. Jessica did not seek out or want the harmful dependencies that ensued due to the
15 Defendants’ harmful behavior. The Defendants reasonably foresaw and intended this outcome when
16 designing, programming, and operating their platforms.

17 95. As Jessica’s usage of the Defendants’ platforms continued, so did the unhealthy and
18 harmful behavior resulting in harm to her physical and mental health. She developed anxiety and
19 depression. She lost focus in her studies and was sneaking out of school to “use” the Defendants’
20 products. All Jessica wanted to do was to be on the Defendants’ platforms. When Jessica’s parents
21 noticed her dependence on the Defendants’ platforms, they took away her phone, Jessica simply
22 regained access using another device or through friends. No matter what her parents did, Jessica
23 found another way to get back to using the Defendants’ products. Her self-esteem began to suffer
24 because of what she had access to on the Defendants’ platforms. The once confident and outgoing
25 Jessica began withdrawing into herself. She engaged in self-harm by cutting herself multiple times.
26 In April 2018, Jessica cut herself with a piece of glass and her mom had to implement safety
27 measures around the house including removing all sharp objects accessible to Jessica.

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1 96. Around November 2016 and again in 2019, Jessica attempted suicide, the first time
2 by overdosing on her depression medication, and the second time by overdosing on antihistamine.
3 She was so depressed and wanted to end it all. Jessica was hospitalized after each incident and had
4 her stomach pumped.

5 97. Jessica was 14 years old the first time she attempted suicide.

6 98. When Jessica was released from the hospital in 2019, she started going to therapy.
7 Her mental health had suffered tremendously.

8 99. Jessica’s parents became increasingly concerned, confused and helpless as to how to
9 help their child overcome her addiction. It overwhelmed and tore their family apart. At all times,
10 the Defendants knew or should have known that Jessica, was a minor. After the hospitalizations,
11 Jessica’s parents did everything to get Jessica healthy again mentally. They were committed to
12 extensive therapy.

13 100. But for the Defendants’ failure to conduct reasonable age, identity and parental
14 consent verifications, Jessica would not have been exposed to the Defendants’ inherently dangerous
15 and defective features and design. At all times, the Defendants knew or should have known that
16 Jessica was a minor.

17 101. But for the Defendants’ endless feed based on what their algorithm determined would
18 best keep Jessica addicted and engaged, Jessica would not have attempted suicide or self-harm and
19 would not have experienced the anxiety and depression that came from the harmful content directed
20 at her.

21 102. To date, Jessica takes medication to control her depression and anxiety and is
22 attempting to live a normal functioning life as a young adult, but her addiction to the Defendants’
23 products continues to be a challenge for Jessica.

24 103. The harm Jessica suffered was entirely preventable but the Defendants, in their quest
25 for huge profits ignored the health and safety of their users, particularly minors.

26 104. The Defendants track usage data and knew what type of content was being pushed
27 to Jessica as well as the amount of time Jessica was spending on their products.

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1 105. The Defendants deliberately program their technologies to increase engagement and
2 know that harmful content is being pushed to young users like Jessica. This is a risk the Defendants
3 are willing to take, and they did it without Jessica’s parents’ knowledge or consent.

4 106. As a result of Defendants’ questionable marketing practices and defective
5 algorithms, Jessica became depressed, anxious, attempted suicide and self-harmed many times,
6 requiring hospitalization thereby imposing long mental and physical hardships on Jessica.

7 107. As a result of the Defendants’ dangerous products, failure to warn, and negligence,
8 Jessica suffered depression, anxiety, suicide attempts and self-harm which will impact her for the
9 rest of her life.

10 108. As a result of the Defendants’ dangerous products, failure to warn and negligence,
11 which resulted in these harms to Jessica, have suffered loss including but not limited to past and
12 future medical expenses.

13 109. Jessica and her family did not know or have reasons to know about Defendants’
14 defective and/or inherently dangerous products, features, and/or tools, or that the Defendants were
15 using such products, features, and/or tools in an exploitative and harmful manner. Defendants’
16 knowing and deliberate product design, marketing, distribution, programming and operational
17 decisions and conduct caused Jessica serious emotional, mental, and physical harm.

18 **VI. TIMELINESS AND TOLLING OF STATUTES OF LIMITATIONS**

19 110. Through the exercise of reasonable diligence, Plaintiffs did not and could not have
20 discovered that Defendants’ products caused their injuries and/or sequelae thereto because, at the
21 time of these injuries and/or sequelae thereto, the cause was unknown to Plaintiffs.

22 111. Plaintiffs did not suspect and had no reason to suspect Defendants’ products caused
23 their injuries and/or sequelae thereto until less than the applicable limitations period prior to the
24 filing of this action.

25 112. Due to the highly technical nature of the platforms’ features, Plaintiffs and were unable
26 to independently discover that Defendants’ products caused their injuries and/or sequelae thereto
27 until less than the applicable limitations period prior to the filing of this action.

28 113. Defendants had exclusive knowledge of the material defects designed and

1 implemented into their platforms, and they have at all times through the present maintained their
2 proprietary designs of their platforms' features as strictly confidential.

3 114. In addition, Defendants' fraudulent concealment and/or other tortious conduct tolled
4 the running of any statute of limitations.

5 115. Defendants had a duty to disclose dangerous and defective features that cause
6 foreseeable harm to children and teens.

7 116. Defendants knowingly, affirmatively, and actively concealed from Plaintiffs the risks
8 associated with the defects of Defendants' products and that these products caused their injuries
9 and/or sequelae thereto.

10 117. Defendants committed tortious and/or fraudulent acts that continue to this day. As of
11 the date of this Complaint, Defendants still have not disclosed, and continue to conceal, that they
12 designed and implemented dangerous features into their platforms. Despite their knowledge of the
13 defects and their attendant safety risks, Defendants continue to market their platforms to children
14 and teens while simultaneously omitting the disclosure of known and foreseeable harms to children
15 and teens. In contrast, Plaintiffs were unaware and could not have reasonably known or learned
16 through reasonable diligence that they had been exposed to the defects and risks alleged herein and
17 that those defects and risks were the direct and proximate result of Defendants' acts and omissions.

18 118. Plaintiffs were unaware and could not have reasonably known or learned through
19 reasonable diligence that the harms they suffered were directly and proximately caused by
20 Defendants' acts and omissions.

21 119. For the foregoing reasons, Defendants are estopped from relying on any statutes of
22 limitation or repose as a defense in this action and as to all claims against them. All applicable
23 statutes of limitation and repose have been tolled by operation of one of more of the following: the
24 discovery rule, Defendants' active and fraudulent concealment, equitable tolling, and/or the
25 continuing nature of harms Defendants caused and continue causing to this day.

26 **VII. PLAINTIFFS' CLAIMS**

27 120. The entirety of this Complaint is pled upon information and belief and each allegation
28 contained herein is likely to have evidentiary support after a reasonable opportunity for further

1 investigation or discovery.

2 121. Plaintiffs plead all Causes of Action of this Complaint in the broadest sense, pursuant
3 to all laws that may apply under choice-of-law principles, including the law of the resident states of
4 Plaintiffs. To the extent applicable to specific Causes of Action, Plaintiffs plead these Causes of
5 Action under all applicable product liability acts, statutes, and laws of their respective States.

6 122. Plaintiffs hereby incorporate and adopt as though set forth in full herein, the following
7 causes of action and allegations from Section VI of the Master Complaint:

8 **COUNT 1:**
9 **STRICT LIABILITY – DESIGN DEFECT**
10 **(Against All Defendants)**

11 123. Plaintiffs reallege and incorporate by reference each preceding and succeeding paragraph
12 as though set forth fully at length herein, and hereby incorporate as though set forth fully herein
13 Paragraphs 825 through 850 of the Master Complaint.

14 **COUNT 2:**
15 **STRICT LIABILITY – FAILURE TO WARN**
16 **(Against All Defendants)**

17 124. Plaintiffs reallege and incorporate by reference each preceding and succeeding paragraph
18 as though set forth fully at length herein, and hereby incorporate as though set forth fully herein
19 Paragraphs 852 through 868 of the Master Complaint.

20 **COUNT 3:**
21 **NEGLIGENCE – DESIGN**
22 **(Against All Defendants)**

23 125. Plaintiffs reallege and incorporate by reference each preceding and succeeding paragraph
24 as though set forth fully at length herein, and hereby incorporate as though set forth fully herein
25 Paragraphs 870 through 892 of the Master Complaint.

26 **COUNT 4:**
27 **NEGLIGENCE – FAILURE TO WARN**
28 **(Against All Defendants)**

126. Plaintiffs reallege and incorporate by reference each preceding and succeeding paragraph
as though set forth fully at length herein, and hereby incorporate as though set forth fully herein
Paragraphs 894 through 911 of the Master Complaint.

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COUNT 5:
NEGLIGENCE
(Against All Defendants)

127. Plaintiffs reallege and incorporate by reference each preceding and succeeding paragraph as though set forth fully at length herein, and hereby incorporate as though set forth fully herein Paragraphs 913 through 938 of the Master Complaint.

COUNT 6:
FRAUDULENT CONCEALMENT
(Against the Meta Defendant)

128. Plaintiffs Lauren Nichole Rook, individually and as administrator ad litem for the estate of Lonna Marie Rook, and Jessica Nicole Robles reallege and incorporate by reference each preceding and succeeding paragraph as though set forth fully at length herein.

129. This claim is brought against Meta.

130. Plaintiffs hereby incorporate as though set forth fully herein Paragraphs 958 through 976 of the Master Complaint.

131. These Plaintiffs asked their parent or parents if they could open Instagram and/or Facebook accounts or opened those accounts without their parents' knowledge or consent, which accounts their parents then found out about. Prior to those children joining Instagram and/or Facebook and/or discovery of those accounts, their parents were generally familiar with those products and were unaware that youth usage of those products could lead to addiction and other mental and physical health harms.

132. Relying on the information Meta provided and put out into the public, Plaintiffs believed that Instagram and/or Facebook were safe and age-appropriate for the aforementioned minor Plaintiffs. These Plaintiffs did not see nor were they aware of any information about the defective features identified herein and in the Master Complaint. Nor did they see any information about the risks of addiction or resulting physical and mental health harms from usage of Instagram and/or Facebook. These omissions were material to their decision to allow their minor children to open an account on Instagram and/or Facebook.

133. Had Meta publicly or privately disclosed the risks of harm associated with its products' defects, these Plaintiffs would have been aware of such disclosures and would not have allowed

1 their minor children to open an account or continue using an account once discovered; and likewise,
2 the children themselves would have been aware of such disclosures and would not have opened an
3 account.

4 **COUNT: 7**
5 **NEGLIGENCE PER SE**
6 **(Against the TikTok Defendants)**

7 134. Plaintiffs Lauren Nichole Rook, individually and as administrator ad litem for the
8 estate of Lonna Marie Rook, and Jessica Nicole Robles re-allege and incorporate by reference each
9 preceding and succeeding paragraph as though set forth fully at length herein, and hereby incorporate
10 as though set forth fully herein Paragraphs 994 through 1013 of the Master Complaint.

11 **COUNT 8:**
12 **WRONGFUL DEATH**
13 **(Against the Facebook, Instagram, TikTok, Snapchat, YouTube Defendants)**

14 135. Plaintiff Lauren Nichole Rook, individually and as administrator ad litem for
15 the estate of Lonna Marie Rook, realleges and incorporates by reference each preceding and
16 succeeding paragraph as though set forth fully at length herein.

17 136. This Cause of Action is asserted by and on behalf of Plaintiff bringing this action
18 as heir of the Decedent or as duly appointed representative of the estate of the Decedent or successor-
19 in-interest pursuant to the laws of the state of Tennessee.

20 137. As a direct and proximate result of the conduct of each of the identified
21 Defendants and the defective nature of their respective social media products as outlined above,
22 Decedent suffered wrongful death, and Plaintiff suing as heir or estate representative of Decedent
23 seeks damages therefor, including loss of financial support, loss of society, funeral expenses, estate
24 administration expenses, and noneconomic damages including pain and suffering as permitted under
25 various states' laws, and where applicable punitive damages.

26 138. Plaintiff demands judgment against each of the Defendants for compensatory, treble,
27 and punitive damages, together with interest, costs of suit, attorneys' fees, as permitted under
28 various states' laws and all such other relief as the Court deems proper.

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COUNT 9:
SURVIVAL ACTION
(Against the Snap Inc, Instagram, TikTok, Bytedance Defendants)

139. Plaintiff Lauren Nichole Rook, individually and as administrator ad litem for the estate of Lonna Marie Rook re-alleges and incorporates by reference each preceding and succeeding paragraph as though set forth fully at length herein.

140. This Cause of Action is asserted by and on behalf of heir of Decedent or the duly-appointed representative of the estate of Decedent, pursuant to the laws of the state of Tennessee.

141. As a direct and proximate result of the conduct of each of the identified Defendants and the defective nature of their respective social media products as outlined above, Decedent suffered bodily injury resulting in pre-death pain and suffering, disability, disfigurement, mental anguish, emotional distress, loss of capacity of the enjoyment of life, a shortened life expectancy, expenses for hospitalizations and other medical and nursing treatments, loss of earnings, and loss of ability to earn. Plaintiffs suing as heirs or estate representatives seek damages for these injuries to their respective Decedent as permitted under state laws, including where applicable, punitive damages.

142. Plaintiff demands judgment against each of the Defendants for compensatory, treble, and punitive damages, together with interest, costs of suit, attorneys' fees, as permitted under state law, and all such other relief as the Court deems proper.

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COUNT 10:
LOSS OF CONSORTIUM AND SOCIETY
(Against the Snap, Facebook, YouTube, Instagram, TikTok Defendants)

143. Plaintiff Lauren Nichole Rook, individually and as administrator ad litem for the estate of Lonna Marie Rook, re-alleges and incorporates by reference each preceding and succeeding paragraph as though set forth fully at length herein, and hereby incorporate as though set forth fully herein Paragraphs 1033 through 1036 of the Master Complaint.

V. DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial on all issues so triable.

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Leslie M. Kroeger (*pro hac vice pending*)*
lkroeger@cohenmilstein.com
COHEN MILSTEIN SELLERS & TOLL PLLC
11780 U.S. Highway One, Suite N500
Palm Beach Gardens, FL 33408
T: (561) 515.2634

Attorneys for Plaintiffs