

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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

Case No. 4:22-md-03047-YGR

MDL No. 3047

This Document Relates to:
SCHOOL DISTRICT NO. 1J, MULTNOMAH
COUNTY, OREGON (A/K/A PORTLAND
PUBLIC SCHOOLS); Plaintiff
v.

**LOCAL GOVERNMENT AND SCHOOL
DISTRICT MASTER SHORT-FORM
COMPLAINT AND DEMAND FOR JURY
TRIAL**

Member Case No.:

The Plaintiff(s) named below file(s) this *Short-Form Complaint and Demand for Jury Trial* against the Defendant(s) named below by and through their undersigned counsel. Plaintiff(s) incorporate(s) by reference the allegations, claims, and relief sought in *Plaintiffs' Master Local Government and School District Complaint* ("Master Complaint") as it relates to the named Defendant(s) (checked-off below), filed in *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, MDL No. 3047, in the United States District Court for the Northern District of California. Plaintiff(s) file(s) this *Short-Form Complaint* as permitted by Case Management Order No 8.

Plaintiff(s) indicate(s) by checking the relevant boxes below the Parties and Causes of Actions specific to Plaintiff(s)' case.

Plaintiff(s), by and through their undersigned counsel, allege(s) as follows:

I. DESIGNATED FORUM

1. *For Direct Filed Cases:* Identify the Federal District Court in which the Plaintiff(s) would have filed in the absence of direct filing:

District of Oregon

2. *For Transferred Cases:* Identify the Federal District Court in which the Plaintiff(s) originally filed and the date of filing:

II. IDENTIFICATION OF PARTIES

A. PLAINTIFF(S)

3. *Plaintiff(s):* Name(s) of the local government or school district alleging claims against Defendant(s):

SCHOOL DISTRICT NO. 1J, MULTNOMAH COUNTY, OREGON
(A/K/A PORTLAND PUBLIC SCHOOLS)

4. Number of schools served in the Plaintiff(s)' school district or local community:

81

5. Number of minors served in the Plaintiff(s)' school district or local community:

41,923

6. At the time of the filing of this *Short-Form Complaint*, Plaintiff(s) is/are a resident and citizen of [*Indicate State*]:

Oregon

B. DEFENDANT(S)

7. Plaintiff(s) name(s) the following Defendant(s) in this action [*Check all that apply*]:

META ENTITIES

- ☒ META PLATFORMS, INC.,
formerly known as Facebook, Inc.
- ☒ INSTAGRAM, LLC
- ☒ FACEBOOK PAYMENTS, INC.
- ☒ SICULUS, INC.
- ☒ FACEBOOK OPERATIONS, LLC
- ☒ FACEBOOK HOLDINGS, LLC
- ☒ META PAYMENTS INC.

TIKTOK ENTITIES

- ☒ BYTEDANCE LTD
- ☒ BYTEDANCE INC.
- ☒ TIKTOK LTD
- ☒ TIKTOK LLC
- ☒ TIKTOK INC.

SNAP ENTITY

- ☒ SNAP, INC.

GOOGLE ENTITIES

- ☒ GOOGLE, LLC
- ☒ YOUTUBE, LLC

OTHER DEFENDANTS

For each “Other Defendant” Plaintiff(s) contends are additional parties and are liable or responsible for Plaintiff(s)’ damages alleged herein, Plaintiff(s) must identify by name each Defendant and its citizenship, and Plaintiff(s) must plead the specific facts supporting any claim against each “Other Defendant” in a manner complying with the requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional pages to this *Short-Form Complaint*.

NAME	CITIZENSHIP

III. CAUSES OF ACTION ASSERTED

8. The following Causes of Action asserted in the *Master Complaint*, and the allegations with regard thereto, are adopted in this *Short-Form Complaint* by reference (*check all that are adopted*):

Asserted Against ¹	Count Number	Cause of Action (COA)
☒ Meta entities ☒ Snap ☒ TikTok entities ☒ Google entities ☐ Other Defendant(s) ²	1	NEGLIGENCE
☒ Meta entities ☒ Snap ☒ TikTok entities ☒ Google entities ☐ Other Defendant(s)	2	PUBLIC NUISANCE

NOTE

If Plaintiff(s) want(s) to allege additional Cause(s) of Action other than those selected in paragraph 8, which are the Causes(s) of Action set forth in the *Master Complaint*, the facts supporting those additional Cause(s) of Action, must be pled in a manner complying with the requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional pages to this *Short-Form Complaint*.

IV. ADDITIONAL CAUSES OF ACTION

9. Plaintiff(s) assert(s) the following additional Causes of Action and supporting allegations against the following Defendants:

¹ For purposes of this paragraph, “entity” means those Defendants identified in Paragraph 7 (*e.g.*, “TikTok entities” means all TikTok Defendants against which Plaintiff(s) is/are asserting claims).

² Reference selected “Other Defendants” by the corresponding row number in the “Other Defendant(s)” chart identified in Paragraph 7.

1 **WHEREFORE**, Plaintiff(s) pray(s) for relief and judgment against Defendants and all
2 such further relief that this Court deems equitable and just as set forth in the *Master Complaint*,
3 and any additional relief to which Plaintiff(s) may be entitled.

4
5 **JURY DEMAND**

6 Plaintiff(s) hereby demand a trial by jury as to all claims in this action.

7 ****

8 By signature below, Plaintiff(s)' counsel hereby confirms their submission to the authority
9 and jurisdiction of the United States District Court of the Northern District of California and
10 oversight of counsel's duties under Federal Rule of Civil Procedure 11, including enforcement as
11 necessary through sanctions and/or revocation of *pro hac vice* status.

12 /s/ Dean Kawamoto

13 Name: Dean Kawamoto

14 Firm: Keller Rohrback L.L.P.

15 Address: 1201 Third Ave., Ste. 3400, Seattle, WA 98101

16 Phone: (206) 623-1900

17 Fax: (206) 623-3384

18 Email: dkawamoto@kellerrohrback.com

19
20 *Attorneys for Plaintiff(s)*

21 SCHOOL DISTRICT NO. 1J, MULTNOMAH COUNTY, OREGON
22 (A/K/A PORTLAND PUBLIC SCHOOLS)

I. PLAINTIFF(S)

School District No. 1J, Multnomah County, Oregon

County of Residence of First Listed Plaintiff:
Leave blank in cases where United States is plaintiff. Multnomah County, Oregon

Attorney or Pro Se Litigant Information (Firm Name, Address, and Telephone Number)
Keller Rohrback L.L.P., 1201 Third Ave., Ste. 3400, Seattle, WA 98101, 206-623-1900

DEFENDANT(S)

Meta Platforms, Inc., et al.

County of Residence of First Listed Defendant:
Use ONLY in cases where United States is plaintiff.

Defendant's Attorney's Name and Contact Information (if known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

☐ U.S. Government Plaintiff

☐ Federal Question (U.S. Government Not a Party)

☐ U.S. Government Defendant

☒ Diversity

III. CAUSE OF ACTION

Cite the U.S. Statute under which you are filing: (Use jurisdictional statutes only for diversity)
28 U.S.C. § 1332

Brief description of case: Public nuisance, negligence

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Personal Injury -Medical Malpractice	PERSONAL INJURY ☒ 365 Personal Injury – Product Liability ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability PRISONER PETITIONS HABEAS CORPUS ☐ 463 Alien Detainee ☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty OTHER ☐ 540 Mandamus & Other ☐ 550 Civil Rights ☐ 555 Prison Condition ☐ 560 Civil Detainee– Conditions of Confinement	☐ 625 Drug Related Seizure of Property 21 USC § 881 ☐ 690 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Management Relations ☐ 740 Railway Labor Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Employee Retirement Income Security Act IMMIGRATION ☐ 462 Naturalization Application ☐ 465 Other Immigration Actions	☐ 422 Appeal 28 USC § 158 ☐ 423 Withdrawal 28 USC § 157 PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 835 Patent—Abbreviated New Drug Application ☐ 840 Trademark ☐ 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 U.S.C. § 7609	☐ 375 False Claims Act ☐ 376 Qui Tam (31 USC § 3729(a)) ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced & Corrupt Organizations ☐ 480 Consumer Credit ☐ 485 Telephone Consumer Protection Act ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/ Exchange ☐ 890 Other Statutory Actions ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☐ 895 Freedom of Information Act ☐ 896 Arbitration ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision ☐ 950 Constitutionality of State Statutes
REAL PROPERTY					
☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property					

V. ORIGIN (Place an "X" in One Box Only)

☐ Original Proceeding

☐ Removed from State Court

☐ Remanded from Appellate Court

☐ Reinstated or Reopened

☐ Transferred from Another District

☐ Multidistrict Litigation–Transfer

☒ Multidistrict Litigation–Direct File

VI. FOR DIVERSITY CASES ONLY: CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Plaintiff

Defendant

☐ Citizen of California

☐ Citizen of Another State

☐ Citizen or Subject of a Foreign Country

☐ Incorporated or Principal Place of Business In California

☒ Incorporated and Principal Place of Business In Another State

☐ Foreign Nation

VII. REQUESTED IN COMPLAINT

☒ Check if the complaint contains a **jury demand**.

☐ Check if the complaint contains a **monetary demand**. Amount:

☐ Check if the complaint seeks **class action** status under Fed. R. Civ. P. 23.

☐ Check if the complaint seeks a **nationwide injunction** or Administrative Procedure Act vacatur.

VIII. RELATED CASE(S) OR MDL CASE

Provide case name(s), number(s), and presiding judge(s).

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation, 4:22-md-3047-YGR, Yvonne Gonzalez Rogers

IX. DIVISIONAL ASSIGNMENT pursuant to Civil Local Rule 3-2 (Place an "X" in One Box Only)

☒ SAN FRANCISCO/OAKLAND

☐ SAN JOSE

☐ EUREKA-MCKINLEYVILLE

COMPLETING THE CIVIL COVER SHEET

Complete the form as follows:

- I. Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. In land condemnation cases, the county of residence of the “defendant” is the location of the tract of land involved.
Attorney/Pro Se Litigant Information. Enter the firm name, address, telephone number, and email for attorney of record or pro se litigant. If there are several individuals, list them on an attachment.
- II. Jurisdiction.** Under Federal Rule of Civil Procedure 8(a), pleadings must establish the basis of jurisdiction. If multiple bases for jurisdiction apply, prioritize them in the order listed:
 - (1) *United States plaintiff.* Jurisdiction based on 28 U.S.C. §§ 1345 and 1348 for suits filed by the United States, its agencies or officers.
 - (2) *United States defendant.* Applies when the United States, its agencies, or officers are defendants.
 - (3) *Federal question.* Select this option when jurisdiction is based on 28 U.S.C. § 1331 for cases involving the U.S. Constitution, its amendments, federal laws, or treaties (but use choices 1 or 2 if the United States is a party).
 - (4) *Diversity of citizenship.* Select this option when jurisdiction is based on 28 U.S.C. § 1332 for cases between citizens of different states and complete Section VI to specify the parties’ citizenship. Note: Federal question jurisdiction takes precedence over diversity jurisdiction.
- III. Cause of Action.** Enter the statute directly related to the cause of action and give a brief description of the cause. Do not cite jurisdictional statutes unless jurisdiction is based on diversity. Example: U.S. Civil Statute: 47 U.S.C. § 553. Brief Description: Unauthorized reception of cable service.
- IV. Nature of Suit.** Check one of the boxes. If the case fits more than one nature of suit, select the most definitive or predominant.
- V. Origin.** Check one of the boxes:
 - (1) *Original Proceedings.* Cases originating in the United States district courts.
 - (2) *Removed from State Court.* Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C. § 1441. When the petition for removal is granted, check this box.
 - (3) *Remanded from Appellate Court.* Check this box for cases remanded to the district court for further action, using the date of remand as the filing date.
 - (4) *Reinstated or Reopened.* Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 - (5) *Transferred from Another District.* Check this box for cases transferred under Title 28 U.S.C. § 1404(a). Do not use this for within-district transfers or multidistrict litigation (MDL) transfers.
 - (6) *Multidistrict Litigation Transfer.* Check this box when a multidistrict (MDL) case is transferred into the district under authority of Title 28 U.S.C. § 1407.
 - (7) *Multidistrict Litigation Direct File.* Check this box when a multidistrict litigation case is filed in the same district as the Master MDL docket.
- VI. Residence (citizenship) of Principal Parties.** Mark for each principal party *only* if jurisdiction is based on diversity of citizenship.
- VII. Requested in Complaint.**
 - (1) *Jury demand.* Check this box if plaintiff’s complaint demanded a jury trial.
 - (2) *Monetary demand.* For cases demanding monetary relief, check this box and enter the actual dollar amount being demanded.
 - (3) *Class action.* Check this box if plaintiff is filing a class action under Federal Rule of Civil Procedure 23.
 - (4) *Nationwide injunction.* Check this box if plaintiff is seeking a nationwide injunction or nationwide vacatur pursuant to the Administrative Procedures Act.
- VIII. Related Cases.** If there are related pending case(s), provide the case name(s) and number(s) and the name(s) of the presiding judge(s). If a short-form MDL complaint is being filed, furnish the MDL case name and number.
- IX. Divisional Assignment.** Identify the divisional venue according to Civil Local Rule 3-2: “the county in which a substantial part of the events or omissions which give rise to the claim occurred or in which a substantial part of the property that is the subject of the action is situated.” Note that case assignment is made without regard for division in the following case types: Property Rights (Patent, Trademark and Copyright), Prisoner Petitions, Securities Class Actions, Anti-Trust, Bankruptcy, Social Security, and Tax.