UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JOSEPH DEAN,
Plaintiff,

Case No. 5:25-cv-10597-NC

v.

META PLATFORMS, INC.,
Defendant.

ADMINISTRATIVE MOTION FOR LEAVE TO FILE SUPPLEMENTAL EVIDENCE [Civil L.R. 7-11]

I. RELIEF REQUESTED

Plaintiff seeks leave to file the attached Exhibit Z, documenting reports from October 2025-January 2026 that Meta has shifted from open-source AI models to closed proprietary models, relevant to Plaintiff's claims of ongoing anticompetitive conduct in the pending motion (Dkt. 64).

II. PROCEDURAL BASIS

Civil L.R. 7-3(d) permits supplemental filings with Court approval. This evidence is relevant to the motion to dismiss set for hearing on February 12, 2026.

III. RELEVANCE TO PENDING MOTION

Exhibit X (July 7, 2025) analyzed Meta's open-source AI positioning and identified indicators of a strategic reversal. Exhibit Y (July 17, 2025) documented Senate Judiciary Committee testimony regarding Meta's allegedly unlawful AI practices. Exhibit Z documents developments from October 2025 through January 2026 that confirm and extend the pattern identified in Exhibits X and Y: Meta is reportedly developing proprietary AI models codenamed "Avocado"

and "Mango" that may not be released as open source (Z-1; Z-2); the company laid off approximately 600 employees from open-source-aligned AI teams while preserving its proprietary unit (Z-3); Meta's chief AI scientist and leading open-source advocate departed citing philosophical differences with new leadership (Z-4); and departing personnel confirmed manipulation of Llama 4 benchmark results and warned of further staff departures (Z-5). This evidence is directly relevant to Plaintiff's claims of anticompetitive conduct

IV. STIPULATION

Defendant's counsel opposes this request.

V. CONCLUSION

Plaintiff respectfully requests leave to file Exhibit Z.

Respectfully submitted,



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Joseph Dean, Pro Se Plaintiff
Dated: February 5, 2026