UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA, TAMPA DIVISION

CASE NO: 8:24-cv-02242-MSS-TGW

PLAINTIFF: JOSEPH DEAN

v.

DEFENDANT: META PLATFORMS INC

MOTION FOR LEAVE TO AMEND EXHIBIT F

Plaintiff Joseph Dean moves pursuant to Federal Rule of Civil Procedure 15(a)(2) for leave to amend Exhibit F to the Second Amended Complaint.

I. NATURE OF AMENDMENTS

The proposed Exhibit F substantially enhances the original economic analysis by:

1. **Adding Proper Legal Citations:** Replacing generic references with specific FTC case citations and exhibit numbers
2. **Incorporating Regulatory Findings:** Including relevant findings from ongoing FTC v. Meta litigation and related proceedings
3. **Strengthening Factual Foundation:** Adding detailed timeline analysis, internal Meta documents, and documented growth destruction evidence
4. **Providing Multiple Damage Scenarios:** Replacing single estimate with conservative, reasonable, and optimistic damage calculations

II. RULE 15(a)(2) FACTORS

No Undue Delay: Motion filed early in proceedings with MTD still pending.

No Bad Faith: Good faith effort to correct deficient citations and incorporate relevant regulatory findings.

No Prejudice: Meta has access to all referenced FTC documents as they are party to that litigation. No new claims or theories added.

Not Futile: Amendments strengthen factual foundation supporting existing antitrust claims.

III. CONCLUSION

Courts "should freely give leave when justice so requires." Fed. R. Civ. P. 15(a)(2). The proposed amendments correct technical deficiencies and incorporate relevant regulatory findings without prejudicing Defendant. Leave should be granted.

WHEREFORE, Plaintiff respectfully requests that the Court grant leave to amend the Second Amended Complaint by substituting the attached Amended Exhibit F as Exhibit F to the operative complaint.

Dated: July 23, 2025

Respectfully submitted,

Joseph Dean
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LOCAL RULE 3.01(G) CERTIFICATION Pursuant to M.D. Fla. L.R. 3.01(g), on July 21, 2025, Plaintiff conferred with counsel for Meta, Diana Marie Fassbender, regarding this Motion for Leave to Amend Exhibit F. Defendant opposes the relief requested.

CERTIFICATE OF SERVICE

I certify that a copy was served on opposing counsel via CM/ECF on July 23, 2025 and served upon counsel via email at dszego@orrick.com.