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January 19, 2024

Submitted Via E-File

Mr. Blake A. Hawthorne
Clerk, Supreme Court of Texas
201 West 14th Street, Room 104
Austin, Texas 78701

Re: No. 24-0046, *In re Meta Platforms, Inc.*; Original Proceeding from Cause No. 22-0121, 71st Judicial District Court, Harrison County, Texas

Dear Mr. Hawthorne:

Washington Legal Foundation (“WLF”) submits this amicus curiae letter brief urging the Court to grant Meta Platforms, Inc.’s (“Meta”) Petition for Writ of Mandamus and to grant Meta protection against the State deposing Meta’s chairman and chief executive officer, Mark Zuckerberg (“Zuckerberg”).

No party’s counsel wrote any part of this letter brief. No person or entity, other than Washington Legal Foundation and its counsel, paid for the letter brief’s preparation or submission.

I. Interest of Amicus Curiae

WLF is a nonprofit, public-interest law firm and policy center with supporters nationwide, including many in Texas. It defends free enterprise, individual rights, limited government, and the rule of law. WLF has long supported strict application of the apex doctrine to high-ranking business executives. *See, e.g., In re Amend. to Fla. Rule of Civ. Proc.* 1.280, 324 So. 3d 459 (Fla. 2021). WLF's Legal Studies Division has also published papers on the importance of the apex doctrine. *See, e.g.,* Paul Alessio Mezzina et al., *The Ongoing Debate Over the Apex Doctrine: New Developments in Georgia and Washington*, WLF LEGAL OPINION LETTER (Jan. 12, 2024), https://www.wlf.org/wp-content/uploads/2024/01/011224MezzinaPritchardSpalding_LOL.pdf.

II. The Apex Doctrine Is Critical To Protecting High-Level Officials From Unwarranted Depositions And Discovery Abuse

The Attorney General has forgotten what he told this Court just last week. A district court recently ordered Attorney General Paxton to sit for a deposition. In asking this Court to stop that order from taking

effect, he argued that “oral depositions of an” organization’s highest-ranking officials are a “clear abuse of discretion.” *Petition for Writ of Mandamus* at 10. *In re Office of the Att’y Gen.*, 24-0019 (Tex. Jan. 12, 2024) (per curiam). That argument is also consistent with his position three terms ago, when he underscored that “[h]igh-ranking government officials and corporate executives should rarely be subject to deposition” because “[u]nnecessarily requiring apex officials to prepare for and attend depositions takes them away from their duties and hurts the organizations they serve—and, ultimately, the public.” Brief for the State of Texas as Amicus Curiae at 1, *In re Am. Airlines, Inc.*, 634 S.W.3d 38 (Tex. 2021) (per curiam) (No. 20-0789).

Now that the shoe is on the other foot, the Attorney General is aggressively arguing against applying the apex doctrine. The Court should reject this gamesmanship and apply well-settled Texas law to stay the District Court’s order requiring that Zuckerberg be deposed within 30 days of January 4, 2024. MR4687. If not corrected, the decisions of the trial court and intermediate appellate court chart a dangerous path,

opening Texas courts to plaintiffs who want to harass corporate executives and coerce settlement by forcing their most senior executives to sit for depositions.

“The purpose of the apex doctrine is to protect high-ranking officials from discovery abuses when they have no particular direct knowledge of the facts pertaining to the lawsuit, and thus require protection from litigation tactics used to create undue leverage by harassing the opposition or inflating its discovery costs.” *Intelligent Verification Sys., LLC v. Microsoft Corp.*, 2014 WL 12544827, *2 (E.D. Va. Jan. 9, 2014) (cleaned up). For years, this issue avoided judicial review in Texas because cases were mooted before this Court could rule. *See Crown Cent. Petrol. Corp. v. Garcia*, 904 S.W.2d 125, 126 n.1 (Tex. 1995). But in *Crown Central Petroleum Corp.*, this Court adopted the apex doctrine and has consistently applied it over the past 30 years. *Id.*; *see, e.g., In re Alcatel USA, Inc.*, 11 S.W.3d 173, 177 (Tex. 2000) (“Allowing apex depositions merely because a high-level corporate official possesses apex-level

knowledge would eviscerate the very guidelines established in *Crown Central.*”).

The reason the Court did so was simple: “As virtually every court which has addressed the subject has observed, depositions of persons in the upper level management of corporations often involved in lawsuits present problems which should reasonably be accommodated in the discovery process.” *Crown Cent. Petrol. Corp.*, 904 S.W.2d at 128. Without a robust—and robustly enforced—apex doctrine, companies will be less likely to conduct business in a state. If a company’s high-ranking officials can be dragged into depositions for hours on end without a just reason, it may make sense for the company to pull out of that state.

III. The State Failed To Show That It Is Entitled To Depose Zuckerberg

The State has not met its burden under *Crown Central Petroleum Corp.* to show that it is entitled to depose Zuckerberg. Under the apex doctrine, “[w]hen a party seeks to depose a corporate president or other high-level corporate official, the trial court should first determine

whether the party seeking the deposition has arguably shown that the official has any unique or superior personal knowledge of discoverable information.” *Am. Airlines*, 634 S.W.3d at 40. Only when (1) “there is a reasonable indication that the official’s deposition is calculated to lead to the discovery of admissible evidence” and (2) “less intrusive methods of discovery are unsatisfactory, insufficient, or inadequate” may a court allow the deposition to proceed. *Crown Cent. Petrol. Corp.*, 904 S.W.2d at 128.

As the head of an \$85 billion company, Zuckerberg qualifies as a “high-level corporate official.” *See* Pet. for Writ of Mandamus at 4. And the State has not shown that Zuckerberg has unique or superior personal knowledge of Meta’s facial-recognition technology at issue. Zuckerberg has some knowledge of relevant information because he received that information from Meta employees who have already been deposed in this case. *See* Pet. for Writ of Mandamus at 13. But this knowledge without more is insufficient to justify an apex deposition because it is neither

“*unique [n]or superior* personal knowledge of discoverable information.”

In re Alcatel USA, Inc., 11 S.W.3d at 179.

The State also failed to show how other methods of discovery are inadequate. To date, Meta has presented over 20 witnesses for more than 100 hours of deposition testimony, produced over 81,000 documents that span more than 300,000 pages, and sent hundreds of pages of written discovery responses to the State. *See* Pet. for Writ of Mandamus at 8. As evidenced by the voluminous discovery that has already taken place, there are myriads of ways the State may obtain discoverable information without deposing Zuckerberg.

IV. Conclusion

As explained in Meta’s Petition for Writ of Mandamus, the State has failed to show that it is entitled to depose the chairman and CEO of an \$85 billion company. This Court adopted the apex doctrine to prevent high-level corporate executives from being deposed on matters in which they lack unique knowledge. But that is precisely what the State wishes

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to do here. The Court should grant the Petition and order the trial court to grant the motion for protection.

Respectfully submitted,

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I certify that this Amicus Letter Brief contains 1,114 words as calculated under Rule 9.4(i)(1) of the Texas Rules of Appellate Procedure.

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