

DEFENDANTS' SOCIAL MEDIA INTERROGATORIES TO
PLAINTIFF, CARMEN ROBINSON

1. Please identify all of your internet social media and networking websites and/or applications, which you have used and/or maintained an account in the last six (6) years. Internet social media websites include, but are not limited to, Facebook, LinkedIn, Twitter, Instagram, Foursquare, YouTube, Pinterest, Google+, Tumblr, Flickr, Skype, FaceTime, etc.
2. For each internet social media website account, please provide your username and password, or alternatively, under Rule 1.34(c), please provide a copy of all non-privileged content/data shared on the account(s) in the last six (6) years. In the event you content there is a privilege to assert, please provide a privilege log.
3. Please identify any and all photograph, still image, and video sharing website that you have used and/or maintain(ed) an account in the last six (6) years. "Internet photo, still image, or video sharing website" is defined as websites in which a user can upload/post/ view still or video image content, which is hosted for and shared public use, which includes but is not limited to YouTube, Shutterfly, Tumblr, Photobucket, Vine, Instagram, etc.
4. For internet photo, still image and video sharing website accounts, please provide your username and password, or alternatively, under Rule 1.340(c), please provide a copy of all non-privileged content/data shared on the account in the last six (6) years. In the event you content there is a privilege to assert, please provide a privilege log.
5. Please identify any and all blog or internet message boards, chat rooms, and public forums that you have participated in or a member of within the last six (6) years. "Internet message board or public forum" includes but is not limited to any internet website or service in which users post messages or content in a public-forum.
6. For each blog or internet message board, chat room, and public forum, please provide your username and password, or alternatively, under Rule 1.340(c), please provide a copy of all non-privileged content/data shared on the account in the last six (6) years. In the event you content there is a privilege to assert, please provide a privilege log.
7. Please provide the name of any email account(s), which you have used and/or maintained in the last 6 years.
8. For any account identified in answer to Nos. 1 – 7, please describe in detail any and all content that you have deleted or erased on or after (*insert date*), including but not limited to photographs, videos, posts, tweets, and name/username changes.