



SECOND LETTER

Caroline Featherstone
Solicitor to the Southport Public Inquiry

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Our ref: ST07/RC10/XIN4.2

3 November 2025

Dear Ms Featherstone

Southport Public Inquiry
Our client: X Internet Unlimited Company ('XIUC')

We write further to your letter dated 28 October 2025 seeking clarification in respect of the disclosure provided by our client on 10 October 2025.

We respond to your questions, adopting your numbering, as follows:

1. An explanation, in plain English, of what has been provided.

The disclosure provided by our client on 10 October 2025 is the 'non-content' data XIUC is the data controller of in relation to three X accounts linked to the email address a.megalanian7@yahoo.com and one X account with handle @Red_Lorry123 linked to the phone number +447428362306.

Our client was initially unable to locate X accounts associated with the other two email addresses referred to in the section 21 notice dated 18 September 2025 (a.hyenadon@gmail.com and a.mega7@yahoo.com). However, on Sunday 2 November, our client revisited this and established that due to an input discrepancy while searching for relevant data, it missed that there were three X accounts associated with the email address a.mega7@yahoo.com with UIDs 1740877648643960832, 1290357107603185669 and 1253331261227020288. Of these three accounts:

- UID 1740877648643960832 - this account was deactivated by the user on 3 January 2024. The only available data is this deactivation date.
- UID 1290357107603185669 - this account was deactivated by the user on 29 August 2021. Again, the only data available is this deactivation date.
- UID 1253331261227020288 - this account is identical to one of the three accounts linked with the a.megalanian7@yahoo.com address which has already been disclosed. Again, the only data available (which has already been disclosed) is the account deactivation date of 12 April 2021.

We apologise for our client's inadvertent failure to locate and disclose this information to the Inquiry earlier. Our client has verified that this was a one-off event and that its production is otherwise accurate.

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We explain the distinction between 'content' and 'non-content' data in response to question 2 below.

By way of further explanation the non-content data disclosed on 10 October 2025 includes the following account information:

Data	Explanation
Account	This contains identity and contact information, email address, the dates and times at which the account and profile were created
Account Creation IP	This contains the IP address used when the account was created.
Phone Number	This contains the phone number currently associated with the account, if a phone number has been provided.
IP Audit	This contains the IP addresses associated with individual user sessions.
Tweets Headers	This contains metadata associated with posts. This data is created automatically by our systems.
Deleted Tweets Headers	This contains metadata associated with posts that have been deleted by the account-holder.
Following	This contains other accounts followed by the target account.
Follower	This contains other accounts that follow the target account.
Account Closure Date	This contains the date that the account was closed.
Direct Message Group Headers	This contains all available metadata for all group messages sent and received by the account(s).
Direct Message Headers	This contains all available metadata for all direct messages sent and received by the account(s).
Deleted Direct Message Group Headers	This contains all available metadata for all group messages sent and received by the account(s), which were deleted by the account-holder, but are still available in X's systems.
Deleted Direct Message Headers	This contains all available metadata for all group messages sent and received by the account(s), which were deleted by the account-holder, but are still available in X's systems.

2. An explanation as to why your client is not able to provide: any messages; AR's own posts; and any interactions of AR with other posts (replies, likes, re-posts etc). In requesting this, we note that another platform with similar jurisdictional issues has been able to provide similar information.

Our client is unable to provide any data which comprises 'content data', which includes direct messages, posts or interactions with other posts on its platform (including replies, likes or re-posts of third-party content), through the legal process adopted by the Inquiry.

Specifically, our client is unable to disclose content data to the Inquiry at this stage without violating US law, in particular the Stored Communications Act (**SCA**, codified at 18 U.S.C. Chapter 121 ss 2701 - 2713). Section 2702 provides that entities providing "electronic communication services" and/or "remote computing services" are forbidden to (our emphasis) "*knowingly divulge to any person or entity the contents of any communication*" which is stored or carried by that service, subject to proscribed exceptions defined in the legislation. Section 2702(b) of the SCA covers the disclosure of the contents of communications and enumerates nine specific exceptions when a provider may do so. Our client thoroughly assessed each of these exemptions with leading US experts and concluded that the only available exemption permitting the disclosure of content data to the Inquiry in these circumstances is Section (b)(9), which permits disclosures to a foreign government pursuant to an executive agreement with the U.S. Our client wrote to the Inquiry explaining this and suggesting a way for them to obtain the requested data via this route, to which our client has not received a response.

We are unable to comment on the position adopted by a third-party platform but, as a general observation, we note that there are circumstances which could make a material difference to the analysis, in particular whether data is hosted exclusively within the US (which is the case for our client) or not.

3. Are you able to provide a year of birth associated with AR's accounts?

The year of birth was not originally requested by the Inquiry in their section 21 notice dated 18 September 2025, and therefore was not produced. X can confirm that it holds this data for @Red_Lorry123 (account ID: 1655670017491345419) and the data has been preserved pending service of a valid section 21 notice on XIUC. The year of birth is not available for the three deactivated accounts linked to a.megalaria7@yahoo.com (account IDs: 1670194621966680065, 1253331261227020288, 1733496966607171584), because the accounts were deactivated and the data deleted prior to X receiving notice to preserve the data. In accordance with its GDPR obligations, X is obliged to only retain data as long as necessary for the purposes for which the data is processed and regularly deletes the data of deactivated accounts in accordance with its data retention policies.

We trust that this clarifies the nature of the material provided by our client on 10 October 2025.

Yours sincerely

Signature

RPC