

EXHIBIT 75

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION/)
PERSONAL INJURY PRODUCTS) MDL No. 3047
LIABILITY LITIGATION)

SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE
COUNTY OF LOS ANGELES - SPRING STREET COURTHOUSE

COORDINATION PROCEEDING)
SPECIAL TITLE [RULE 3.400])

SOCIAL MEDIA CASES) Lead Case No.
22STCV21355

This Document Relates To)

STATE OF TENNESSEE, ex rel.)
JONATHAN SKRMETTI,)
ATTORNEY GENERAL and)
REPORTER,)
v.)
META PLATFORMS, INC., and)
INSTAGRAM, LLC.)

CONFIDENTIAL – PURSUANT TO PROTECTIVE ORDER
VIDEOTAPED DEPOSITION OF ANTIGONE DAVIS
VOLUME 1

MARCH 4, 2025

(Pages 1 - 376)

9:09 a.m. to 6:59 p.m.

Covington & Burling

850 10th St NW, Washington, DC 20001

Reported By: Amanda Blomstrom, RMR, CRR, and
CSR TX #8785/CA #12681/IL #84-3634

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1 Q. For youth safety --

2 A. -- in there too.

3 Q. -- who are the people who are coordinating
4 that at Meta?

5 A. There are a number of people. I'll try --
6 my guess is I'm going to forget somebody, but I'll
7 try to name as many of them as -- as I can.

8 So Guy Rosen is one individual. He works
9 on Integrity.

10 Naomi Gleit runs a lot of this youth XFN
11 and the team there.

12 I'm trying to remember across the
13 different -- across the different teams. So let
14 me -- just give me two seconds.

15 Well, within my team, you have [REDACTED]
16 [REDACTED] and you have Ravi Sinha that -- one who holds
17 the broader youth, and one who holds the child
18 safety. They also have people who report in to them.
19 But they would be the other -- other two sort of in
20 that -- in that group.

21 You have, from the Communications Team,
22 Liza Crenshaw, and you have [REDACTED]

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1 From our, I don't -- I guess our
2 Public Affairs, also partially Research, you have
3 David Ginsberg. You have someone by the name of
4 Miki Rothschild. I'm just trying to remember as many
5 of the names as I -- as I can for you.

6 Those are the names that -- that I can
7 remember off the top of my head. There are more. So
8 I don't -- I don't mean to be not fully inclusive.

9 Q. I understand.

10 But those are the people you recall who
11 are currently responsible for overseeing youth
12 safety; is that --

13 A. Yeah. But --

14 Q. -- right?

15 A. -- there are definitely more of them.

16 Q. Okay.

17 A. I would just have to probably spend a lot
18 of time to think through the full list --

19 Q. Okay.

20 A. -- but, yeah.

21 Q. And those are the people in the
22 currently -- currently in those positions, correct?

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1 A. Yeah. There have been people before, for
2 example, she's no longer with the company, but
3 Karina Newton, for example, was someone who was
4 very -- worked very specifically on that in
5 relation --

6 Q. Okay.

7 A. -- to Instagram.

8 Q. Okay. What role does Communications play
9 in the overall youth safety effort at Meta?

10 A. Well, they are both there to help us
11 communicate out our efforts but also to hear and take
12 in concerns. They get inquiries about various
13 things, so they're pretty familiar with the external
14 concerns, and also to share those concerns for people
15 so we understand what people are thinking about and
16 worrying about.

17 Q. We talked a little bit about research
18 dealing with youth safety. Help me understand how
19 Meta decides what research to do and what research
20 not to do.

21 A. I prob- --

22 MR. IMBROSCIO: Objection to the form;

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1 asked and answered.

2 You can answer.

3 THE WITNESS: I'm probably not the best
4 person to answer that question. I don't know how
5 they decide the different pieces of research that
6 they're going to do or not do.

7 BY MR. KAUFMANN:

8 Q. Do people on your team ever ask for
9 research to be done?

10 A. I don't want to say no, because I don't
11 know for sure, but I'm sure at different points in
12 time we've suggested that we should do research into
13 different areas. My team relies a lot, in the work
14 that we do, on talking to external researchers to
15 understand their research.

16 Q. Based upon the research that Meta does,
17 does Meta make changes or adjustments to avoid harm
18 to youth users?

19 MR. IMBROSCIO: Object to the form.

20 THE WITNESS: We do use our research to
21 try to improve our products and to under -- to change
22 things based on -- on what we learn.

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1 A. We don't -- I don't know if we know
2 specifically. We are aware that people try to lie
3 and/or not share their accurate age.

4 Q. Okay. Now, you mentioned that Meta put
5 in place certain tools or machine learning to help
6 detect the age of individuals; is that right?

7 A. We've tested a number of different things
8 around -- over the years. I think, again, as I've
9 said, this is an industry-wide challenge to
10 understand the age. We've tried using various
11 signals to get us more accurate age. We've tried
12 using different methods. We're now -- we've recently
13 launched age estimation, Google recently launched age
14 estimation.

15 This is a true industry challenge that
16 people have not been able to easily solve, which is
17 why we've been pushing, in part, for this legislation
18 at the OS level where they have that parent -- at
19 least parent-attested age of minors.

20 Q. Okay. So Meta's first use of tools for
21 age verification was related to Facebook Dating in
22 late 2022; is that correct?

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1 A. I don't know that it was the first use. I
2 do know that we use tools there to try to block
3 minors from accessing Dating.

4 Q. Okay. You would agree that Facebook and
5 Instagram weren't designed for users under the age of
6 13?

7 A. Yes. That's in our Terms of Service. We
8 don't want -- we want to prevent those from being --
9 under the age of 13 from being on the platform.

10 Q. You would agree that use of Meta's
11 platforms by under-13 users could be harmful to
12 those users?

13 MR. IMBROSCIO: Object to the form.

14 THE WITNESS: I -- I wouldn't necessarily
15 make that statement about any one kid. But what I
16 can say is that our platform was designed with those
17 meant to be 13 and above.

18 BY MR. KAUFMANN:

19 Q. In addition to excluding under-13 users,
20 Meta has policies, tools, and features to exclude
21 certain content from teen users; is that right?

22 A. To -- there's some that we gate

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1 from -- from people who are under the age of 18.

2 There is some that we don't recommend to people who
3 are under the age of 18. When something violates our
4 policies, we're going to remove it entirely.

5 Q. And when you say there -- there is
6 something that you "gate," you're talking about
7 making an effort to prevent that from reaching a teen
8 account; is that right?

9 A. Correct.

10 Q. Okay.

11 A. People -- not Teen Accounts as what we
12 talked about from -- the new launch of Teen Accounts,
13 but from teens, from those --

14 Q. Okay.

15 A. -- under the age of 18.

16 MR. KAUFMANN: If we could look at what we
17 premarked as COAG 4.

18 This is 10?

19 MS. SHEIKH: (Nodding head.)

20 (Exhibit Meta-A_Davis-10 marked.)

21 THE WITNESS: Can I get a little water,
22 please. That's why I went to this one.

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1 A. So I said "or was." She's not at the
2 company anymore. Was part of the --

3 Q. Okay.

4 A. -- Privacy Policy Team.

5 Q. So your testimony is that [REDACTED]
6 has left the company?

7 A. Correct.

8 Q. Thank you.

9 Let me read the second sentence here.

10 [REDACTED] says, "As you know, we're kicking off a
11 lot of work streams related to teens and U13s."

12 Did I read that correctly?

13 A. Yes.

14 Q. Okay. She goes on to say, "One is to
15 commission external research to support our product
16 and policy positions, and to build support among key
17 stakeholders who will advocate on our behalf."

18 Did I read that correctly?

19 A. Yes.

20 Q. Okay. So here Ms. [REDACTED] is saying she's
21 putting together a research plan to commission
22 external research, right?

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1 A. Yes.

2 Q. And the topic of that is teens and -- and
3 U13s, right?

4 A. Correct.

5 Q. Okay. And the reason to commission
6 external research was to support Meta's product and
7 policy positions, right?

8 A. So it might be helpful to provide some
9 context.

10 One of the things that the industry
11 struggles with is -- has been I think already
12 asked -- is how to address the issue of under-13s
13 trying to go on platforms that were designed for
14 the people who are over 13.. and so many of our
15 counterparts, like YouTube, have offerings for those
16 who are under 13 that are designed for those who are
17 under 13. It's one way of managing the interest in
18 being online and putting them into the appropriate
19 experience.

20 And I think that this research is in
21 relation to trying to understand how to address the
22 issue of under-13s and provide something that would

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1 be an alternative to people who are trying to get on
2 to the platform.

3 Q. I think I understand the -- the context
4 you put it in, but just let me make sure I
5 understand.

6 The -- the ultimate point, you're saying,
7 outside of the context, is that it is or is not
8 correct that Meta was commissioning this external
9 research because it wanted to support its products
10 and policy positions?

11 A. It was hoping to develop a potential
12 product for under-13s that would be more appropriate
13 for under-13s to address that challenge, and so it
14 was looking to do research to support doing something
15 like that.

16 Q. Okay. And Meta was planning to talk to a
17 third-party PR consultant about this project, right?

18 A. I'm not sure what you're referring to,
19 to --

20 Q. Well, maybe we'll -- why don't we continue
21 through the email chain, and we may then provide that
22 answer.

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1 A. Okay. Sorry.

2 Q. No -- no problem.

3 All right. If you can turn to Bates
4 ending in 3056, there is a further writing from
5 Ms. [REDACTED]. She writes at the top of this page, "I
6 put together a tentative plan for three projects to
7 commission that we'd like to share with the PR
8 consultant today."

9 Do you see that?

10 A. Yes.

11 Q. Okay. So Meta was planning to share
12 projects with a PR consultant, right?

13 A. Yes. Again, I think for context, based on
14 what I'm reading here, in order to do something like
15 provide a service to under-13, we wanted -- it sounds
16 like what she's saying is, we want to be able to
17 demonstrate that it's of value, demonstrate what the
18 challenges are. She mentions the -- what's in the
19 other document, but she mentions the current legal
20 and regulatory regime is not working.

21 Q. Okay.

22 A. And I think they want to share it with a

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REPORTER'S CERTIFICATION
DEPOSITION OF ANTIGONE DAVIS

MARCH 4, 2025

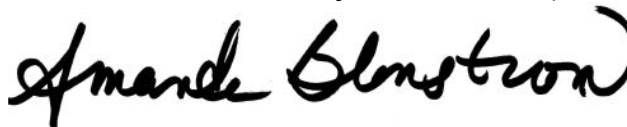
I, Amanda Blomstrom, a Notary Public in and for the District of Columbia, hereby certify to the following:

That the witness, ANTIGONE DAVIS, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;

That the deposition transcript was submitted to the witness or to the attorney for the witness for examination and signature;

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken, and further that I am not financially or otherwise interested in the outcome of the action.

Certified to by me this 14th day of March, 2025.



Amanda Blomstrom, CRR, RMR, CLR
Texas CSR No. 8785
California CSR No. 12681
Illinois CSR No. 84-3634