

Exhibit 34

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT) MDL No.
ADDICTION/PERSONAL INJURY PRODUCTS) 4:22-md-3047-YGR
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.
For Filing Purposes) 22STCV21355

VIDEO DEPOSITION OF JOSHUA SIMONS MP

April 1, 2025

Reporter: John Arndt, CSR, CCR, RDR, CRR
CSR No. 084-004605
CCR No. 1186

1 BY MS. CARROLL:

2 Q. Was addiction or addictive properties a
3 part of that discussion with anyone during your time at
4 Facebook?

5 A. Yes. And in some of the documents that I
6 wrote whilst I was at Facebook, addiction was one of
7 the types of harm or the mechanisms by which harm was
8 reproduced that I talked about with senior
9 executives -- Margaret Stewart, [REDACTED], to name two
10 examples -- in those documents themselves.

11 And in particular, the question we talked about
12 was, given that the whole News Feed system is aimed at
13 engagement, that's a set of repeated patterns of
14 behavior -- clicking, liking, sharing, and on so -- the
15 best way to increase engagement is addiction in some
16 way, you know, is to get people doing those forms of
17 engagement.

18 And so the type of content that the News Feed
19 system made viral was the kind of content that would
20 make you feel, make users feel whatever they needed to
21 feel to produce that type of behavior. And so I talked
22 with News Feed executives as well as Margaret and
23 [REDACTED] about that feedback loop, essentially, of a
24 system designed to promote engagement that produced
25 content that kept people on the platform, coming back