

Exhibit 51

CONFIDENTIAL

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT) MDL No.
ADDICTION/PERSONAL INJURY) 4:22-md-3047-YGR
PRODUCTS LIABILITY LITIGATION)

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

COORDINATION PROCEEDING)
SPECIAL TITLE [RULE 3.400]) Lead Case No.
) 22STCV21355
SOCIAL MEDIA CASES)

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)

This Document Relates to:)

)
STATE OF TENNESSEE,)
ex rel. JONATHAN SKRMETTI,)
ATTORNEY GENERAL and REPORTER,)
v.)
META PLATFORMS, INC., and)
INSTAGRAM, LLC,)
Case No. 23-1364-IV)
-----)

Monday, March 17, 2025

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Video-Recorded Oral Deposition of
ADAM S. MOSSERI held at the offices of
Covington & Burling LLP, Salesforce Tower,
415 Mission Street, Suite 5400, San
Francisco, California, commencing at
9:14 a.m. PST on the above date, before
Michael E. Miller, Fellow of the Academy of
Professional Reporters, Certified Court
Reporter, Registered Diplomate Reporter,
Certified Realtime Reporter and California
CSR #13649.

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H2 2018 IG Well-being Data and Research Highlights

This is a summary of research and data understanding from H2 2018. This is the condensed version of the insights. For research and data summaries that include additional graphs, quotes, opportunities and next steps please see the detailed research insights: [H2 2018 IG Well-being Research learnings](#); data insights: [Data: Roadmapping Themes](#).

Content Problems

- Highly sexual content (including N/P, solicitation, CEI/IIC, NCII) is a big problem on IG both in terms of reach and intensity. Solicitation has the third highest reach among violating content types in terms of DAP exposed and the fifth highest report rate.
- Teens have higher rates of exposure to violating content than non-teens; they also have a higher rate of reporting. 14.8% of teen DAP are exposed to any OC/HC versus 9.97% non-teens; this difference is more pronounced for child safety, SSI, and terrorism propaganda.

Harmful Content

- 3% of searches on Instagram result in a violating entity. This is primarily driven by hashtag searches, and nudity and pornography and solicitation are particular problem areas in this space.
- Identifying shared accounts from a disabled user is particularly promising for IIC. We can double disabled accounts for inappropriate interactions with children if we look at accounts that share a device with an IIC disabled account.
- Instagram is a popular platform for communicating about and finding support for suicide and self-injury (SSI) especially among teens. SSI involves 1/4th as many reporters as B+H and has 1/5th as many content producers as B+H. But, there is a significant risk of contagion, especially during times of heightened awareness (e.g., high-profile suicide). Indeed, the odds of posting SSI content on Instagram are 7x higher for people who see a suicide admission than for people who do not.
- Selected Opportunities:
 - How might we identify moments of heightened awareness around SSI?
 - How might we reduce or better support people around exposure to SSI?

Objectionable Content

- 43% of people exposed to nudity and pornography were exposed via a recently checkpointed source 43% of DAP exposed to nudity and pornography were exposed to a profile that recently cleared the deleted content checkpoint, or to media created by an account that recently cleared the deleted content checkpoint.
- Recall of violating content from reporting is reasonable for nudity and pornography at ~40%, but much lower for violence at ~5% Understanding how much known violating content identified by prevalence is also reported helps us understand our recall of badness is from reporting.
- Most people who are exposed to graphic violence are exposed to mutilated humans, or uncategorized violence 40% of DAP exposed to violence is to mutilated humans, and 40% is to uncategorized violence; 50% of overall impressions are on Explore grid; animal abuse impressions are majority on home feed, other harm impressions are majority on Explore feed
- Selected Opportunities:
 - Can we do more to prevent people from seeing objectionable content from a known bad source?
 - Why is the recall on violating content from prevalence so low for violence? Do our policies not align with user perceptions / are our policies for violence less clear? How can we increase reporting on violating content for violence?

Actor/Behavior Problems

fake accounts & site integrity

- An estimated 3.8% of Instagram MAP accounts are fake. However, most users are unlikely to report suspicious accounts, but rather remove the follower or block them.

Inauthentic engagement

EXHIBIT

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META-MOSSERI 3/17/25

META3047MDL-031-00048769

Metadata

All Custodians	[REDACTED]ada_Shruti[REDACTED];Castaneda_Diego[REDACTED] [REDACTED]ss[REDACTED] [REDACTED]Modv_Shilpa;Mosseri_Adam[REDACTED];Newt on_Karina[REDACTED] Rothschild_Wiki[REDACTED];Shapira_Yoav;Sismondo_Charles	SEMANTIC
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Inauthentic engagement

Conflict

- Conflict often occurs between people known in real life, and people regret engaging in conflict due to damage it does to their relationships, especially their real-world relationships.
- Teens weaponize IG's feature to torment each other, often in ways that do not violate IG's policies. For example, teens: use blocks to blind their targets to slanderous posts and comments, create private "hate" accounts to gossip and insult their targets, and use vague language to ensure "plausible deniability."
- Although, comments are not a significant source of exposure to violating content, they are perceived as a common source of conflict (and the third most prevalent reason for deleting a conflict), and receiving unkind comments can result in churn and conflict can be associated with real world negative experiences and consequences (e.g., family division, eating disorders).
- Our current controls are not supporting Instagrammers experiencing conflict - reporting is very rare and occurs on less than 1% of unkind comments, there is low awareness of our comment controls, and people worry about using self-remediation measures that may impact their relationships or hide activity they want to be aware of.

Selected Opportunities:

- How might we help users better manage their conflicts, especially with real-world connections?
- How might we understand the roles Instagram plays in real-world conflicts?
- What if we developed new comment controls, such as a temporary comment block?
- How might we help teens manage subtle attacks and discourage them from tormenting each other?

social comparison

- Social comparison is a common phenomenon on IG and it can bring both negative and positive well-being outcomes. Preliminary survey findings suggest 37% felt worse after comparing with others, and 29% felt better after comparing with others on Instagram.
- The perceived authenticity of content influences whether or not social comparison has a positive or negative impact on individuals. Interview results show that when users perceive the content as a disingenuous representation of the reality, they would feel more negative social comparison. When people perceive the photos as genuine representations of the achievements of their friends or public figures that they look up to, people would not feel jealous but feel happy for them. People who experience more negative social comparison reported a lower tendency to express themselves authentically, and higher pressure to be perfect on IG.
- Photos and videos are most frequently cited (53%) as a trigger that causes negative social comparison, followed by the number of likes (30%), the number of followers (22%).
- Health, travel, beauty, fashion, and romantic are the top content categories causing social comparison. Animals, humor, and cars are the three most infrequent causes of social comparison. (WIP data)

Selected Opportunities:

- How might we foster more authentic expression and lessen the effect of negative social comparison?
- What if we train classifiers to identify content that is more likely to trigger social comparison and collect people's preferences towards seeing those content?

time spent & Meaningful Usage

- On a given day, 0.1% of DAP spend >6.83 hours (and 99.9% of users spend less than this). Within a given month, 0.1% of MAP spend >127.43 total hours, i.e., they average >4.55 hours per day for the entire month. Most users can NOT accurately estimate the time they spend on Instagram. Time spent on IG is positively related to well-being among the general population, but some relationships become negative among the higher time spent users (top 1%).
- We identified people who spend more than 3 hours on Instagram a day (top 1%), teens (under 18) and young adults (18 to 24) as the main problematic populations.
- Relative to baseline, high TS accounts tend to have more followers, more followings, be newer accounts, be teens, be from US/Saudi Arabia/Iran, use iOS. They do not appear to be more passive in their usage of Instagram. Why people think they spend too much time: they lose control of time in app and get distracted in video chaining, profile hopping and so on; they feel some mental or physical health problems; their real-life activities are impacted.
- Activities that are positively associated with WB are receiving impressions and comments, sending likes, and spending time in composer and messaging. Activities that are negatively associated with WB are consuming impressions, creating media without receiving interactions, and spending time on video and explore.
- Meaningful activities users identified include: interactions with other people, connecting with others, consuming content that are relevant or inspirational (ref1, ref2), creating value in real life, creating content to express themselves, engage with other people or gain income. Meaningless activities include: passive scrolling, unintentional or negative content

consumption, negative interactions such as hate speech or argument and low-value interactions.

Selected Opportunities:

- How might we increase the awareness of users' time spent in app, especially in activities that are distracting, such as watching videos or profile hopping?
- What if we give people options to customize their experience in app, such as disabling video chaining, receiving aggregated notifications, having customized reminders during certain time of day or certain time of year?
- What if we invest more in promoting meaningful usage on Instagram, such as increasing content relevancy, strengthening meaningful connections, and creating value in the real world?

Contact Support

Conversation History

[REDACTED] opened your conversation with [REDACTED], Adam Mosseri,
[REDACTED], [REDACTED] (IG), [REDACTED], [REDACTED], Diego Castaneda, [REDACTED], [REDACTED],
[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] (IG), [REDACTED],
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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED],
Evelio Tarazona Caceres and Zahir Bokhari Nov 18, 2019 at 9:18 pm

[REDACTED] opened your conversation with [REDACTED], Adam Mosseri, [REDACTED], [REDACTED],
[REDACTED] (IG), [REDACTED], Diego Castaneda, [REDACTED], [REDACTED], [REDACTED],
[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] (IG), [REDACTED],
[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED],
[REDACTED], [REDACTED] (IG), [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED].