

Exhibit 76

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 IN RE: SOCIAL MEDIA ADOLESCENT | MDL No. 4:22-MD-3047-YGR
4 ADDICTION/PERSONAL INJURY |
5 PRODUCTS LIABILITY LITIGATION |

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

8 COORDINATION PROCEEDING |
9 SPECIAL TITLE [RULE 3.400] |

10 SOCIAL MEDIA CASES | Lead Case for Filing
11 Purposes
12 22STCV21355

13 This Document Relates to: |

14 STATE OF TENNESSEE, ex. Rel. |
15 JONATHAN SKRMETTI, ATTORNEY |
16 GENERAL and REPORTER, |
17 v. |
18 META PLATFORMS, INC., and |
19 INSTAGRAM, LLC, |
20 Case No. 23-1364-IV |

21 VIDEOTAPED DEPOSITION OF NICK CLEGG
22 Volume 1

23 Taken on Behalf of the Plaintiffs

24 DATE TAKEN: Thursday, March 20, 2025
25 TIME: 9:22 a.m. - 7:29 p.m. GMT
26 PLACE: Covington & Burling LLP
27 22 Bishopsgate, 54th Floor
28 City of London, London EC2N 4BQ
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30 Examination of the witness stenographically reported by:
31 SUSAN D. WASILEWSKI, RPR, CRR, CMRS, CRC, FPR

32 - - -
33 GOLKOW, a Veritext Division
34 cs-golkow@veritext.com
35

1 MS. O'NEILL: That works for me if that
2 works for you.

3 THE WITNESS: Okay. Sure.

4 MS. O'NEILL: Okay. We can go to
5 Document 17, which we'll mark as Exhibit 15.

6 (Meta - Clegg Exhibit 15 was marked for
7 identification.)

8 THE WITNESS: Thank you.

9 MS. O'NEILL: And it's Bates stamped
10 META3047MDL-003-0019950.

11 BY MS. O'NEILL:

12 Q. Do you recognition this document?

13 A. I do.

14 Q. What is it?

15 A. Can I just read it for a second before --

16 Q. Yes.

17 I'll just ask again, do you recognize this
18 document?

19 A. I do.

20 Q. And what is it?

21 A. It's a series of e-mails from 2021 about a
22 so-called contingency request made for resources
23 related to a well-being product strategy.

24 Q. And you're a participant in this e-mail
25 chain, right?

1 A. I am.

2 Q. Let's go to Page 2. At the bottom of the
3 page is an e-mail from you to Mr. Zuckerberg in
4 August of 2021, right?

5 A. Yes.

6 Q. And then looking to the next page, you write
7 that "KX, Pratiti and [REDACTED] have put together the
8 proposal below," right?

9 A. Yes.

10 Q. And who are KX, Pratiti and [REDACTED]?

11 A. Pratiti and [REDACTED] were, at the time, involved
12 in the company's research work on a range of topics,
13 so they were sort of researchers, and KX, I think at
14 the time he -- he was a very long-standing employee
15 at the company, I think he was actually one of the
16 earliest employees of all, and I think at the time
17 his principal focus was leading some teams related
18 to health, sort of health work that the company had.

19 Q. And why are you sending this request to
20 Mr. Zuckerberg instead of those three?

21 A. Oh, I think it was just a matter of
22 seniority. I think they came to me and, clearly, as
23 per the second sentence in that first paragraph, I
24 had also liaised with Chris Cox and Alex Schultz
25 and, in a sense, I was, you know, a sort of mailbox,

1 not quite a mailbox but I was -- I was a senior
2 executive representing on behalf of a collective
3 effort reflected in this note, because this is a
4 note which is asking for extra resources outside the
5 normal way in which resources are allocated. So
6 that's generally, like all organizations, not an
7 easy thing to do, and it's generally only done -- or
8 it's only usefully done, because it's a sort of a
9 process of advocacy by -- against many other
10 competing resources and when resources have already
11 been allocated formally, done by a senior executive.

12 Q. And you felt strongly about this proposal
13 enough to sponsor it to Mr. Zuckerberg?

14 A. Oh, I wouldn't have sponsored it if I didn't
15 think it was good idea.

16 Q. And in fact --

17 A. But to stress, I did so knowing, as I think
18 I said very clearly, that, you know, this was
19 something that would have to be weighed up against
20 many other contingency requests.

21 Q. And in fact, you, in the second line of your
22 e-mail, you strongly endorsed this proposal, right?

23 A. That's what it says.

24 Q. And when communicating with Mr. Zuckerberg,
25 who you directly report to, you, of course, do your

1 best to present issues accurately and completely,
2 right?

3 A. Of course, but also, as is very clear, it's
4 an exercise in advocacy, because he is having to
5 weigh up lots of different requests for additional
6 resources over and above the resources which have
7 been already annually allocated, so it's an advocacy
8 exercise as well, of course, as an exercise in
9 accuracy.

10 Q. Let's look at the first line of your e-mail
11 just to get more details on this proposal. You say
12 that the proposal is "for additional investment to
13 strengthen our position on wellbeing across the
14 company." Right?

15 A. Sorry. Yes, yes.

16 Q. And in the next paragraph you say that "this
17 work has become increasingly urgent over recent
18 months." Right?

19 A. Yes. That paragraph is referring to the
20 fact, as the subsequent sentences elaborate on, that
21 as a matter of sort of public reputational and
22 political concern, it was something that was clearly
23 of high priority.

24 Q. Indeed you wrote that politicians are
25 "expressing concerns about the impact of our

1 products on young people's mental health."

2 Right?

3 A. Yes. I'm just reflecting, as per my role,
4 what I'm hearing from policymakers around the world.

5 Q. So your main rationale for this investment
6 was to be responsive to politician and policymaker
7 concerns?

8 MR. IMBROSCIO: Object to the
9 characterization.

10 A. My general role in the company is to seek to
11 make sure the company is responsive to, you know, a
12 wide range of societal concerns. You can't be
13 responsive to all of them but this was an area which
14 I felt, you know, merited further work, and indeed
15 further work, of course, continued.

16 Q. Looking at the last paragraph of your e-mail
17 before you signed Nick, starting "Nonetheless," you
18 note that despite the work the company has done, "we
19 need to do more and we are" -- excuse me -- "and we
20 are held back by a lack of investment on the product
21 side which means that we're not able to make changes
22 and innovations at the pace required..."

23 Right?

24 A. That's what it says, yes.

25 Q. And you meant here that there is a lack of

1 investment in the teams and people who actually make
2 changes to the app, is that what you meant by
3 product side?

4 A. I think if you take the whole paragraph,
5 what I meant was I felt that the way that the
6 company was organized was disjointed and fragmented.
7 It's something which I -- a theme I often referred
8 to, that I felt we could deliver more bangs for our
9 bucks, if I could put it like that, by being better
10 organized across many -- across many teams.

11 Q. And following up on that, just to look at
12 your sentence along those lines, you say: "Our
13 wellbeing work is both under-staffed and fragmented
14 across teams."

15 Right?

16 A. Yes. I think -- I can't remember where but
17 somewhere else in the document, or maybe it's the
18 previous document, it says that there were around 90
19 engineers working in this area but in a way that was
20 some disparate, so I think this issue of not just
21 absolute numbers but how they're organized and
22 whether people are pulling in the same direction was
23 something that as a senior executive I am always
24 keen to seek to improve upon.

25 Q. In turning to the next page, at the bottom,

1 under the chart, you note that "we selected the top
2 topics that key experts and policy stakeholders
3 advocate are important for us to focus on, and where
4 we are currently underinvested."

5 Right?

6 A. That's what it says.

7 Q. And then going on to the next page, you note
8 that these topics, which are problematic use,
9 bullying and harassment, connections and SSI, "are
10 also highly aligned with what teens want Facebook
11 and Instagram to prioritize."

12 Right?

13 A. That's what it says, yes.

14 Q. Let's go back to the third page and look at
15 the actual request, so this is the page ending
16 190952.

17 A. Uh-huh.

18 Q. And under "Well-being products strategy
19 headcount request," you say: "We are not on track
20 to succeed for our core well-being topics, including
21 problematic use, bullying & harassment, connections,
22 and SSI)."

23 Right?

24 A. That's what it says.

25 Q. That's what you wrote, right?

1 A. Yep. Yes.

2 Q. And then you say: "These issues affect
3 everyone, especially Youth and Creators."
4 Right?

5 A. Yes, that's what I wrote.

6 Q. And then you note that Mr. Jin and his team
7 have "developed a product strategy that will get us
8 on track for success over the next two years."

9 Right?

10 A. Yes.

11 Q. And then you say while much of the funding
12 can come out of other areas, a few critical things
13 will likely not. Right?

14 A. That's what it says, yeah.

15 Q. And there are two critical things in
16 particular that you identify, right?

17 A. Correct.

18 Q. Can you read the first one?

19 A. "Establishing a central cross-Family team:
20 One of the core gaps right now is each team
21 approaches well-being differently (if at all), and
22 no one owns end-to-end success in each area across
23 all audiences; staffing this is a prerequisite for
24 company long-term success, and will let us achieve
25 more out of the family of app investments. [25 XFN

1 Headcount]."

2 Q. Just for the jury and for our benefit, what
3 is a cross-family team?

4 A. A cross-family -- where do I say
5 cross-family team?

6 Q. In the heading.

7 A. Sorry. Central and cross-family team.
8 Forgive me. That means a team which is able to
9 operate across all the different domains in the
10 company and across all the different products as
11 well, so Instagram, Facebook, Messenger, AR, VR.
12 It's a company which, you know, has an increasing
13 proliferation of products and it's clear that, at
14 that time at least, I felt that a central team needs
15 to pull together some of this work.

16 Q. And when you say 25 XFN headcount, what does
17 XFN refer to?

18 A. I forget what the acronym actually stands
19 for, cross something something. Anyway, I think --
20 well, what it means in the company at least is
21 bringing people together from different teams, so
22 trying to create a horizontal functionality across
23 the vertical teams doing their different things,
24 yeah.

25 Q. So people with different skill sets, so

1 engineers, user experience researchers, and the
2 like?

3 A. It's not so much defined by what their
4 expertise is. It's just that their functionality is
5 one that seeks to operate across different teams.

6 Q. Can you -- well, actually, before we go to
7 the second one, just to confirm, you were requesting
8 25 new positions to form a central cross-family team
9 for well-being, right?

10 A. Yes. It -- at that time the suggestion was
11 that 25 additional heads in this contingency request
12 were required for cross-team work.

13 Q. And can you read the second point in your
14 e-mail, please?

15 A. "Accelerating work around Problematic Use on
16 FB/IG: This is the topic where we have the largest
17 cap relative to competitors and external
18 expectations as well as minimal current staffing.
19 [20 ENG for FB/IG]."

20 Q. What is problematic use?

21 A. Problematic use, I think, is a loose term
22 for -- to describe people who or users who find that
23 they are using the product excessively, or whether
24 they're finding the experience not a wholly positive
25 one.

1 Q. And to sum up, this is a request for 20
2 engineers for Facebook and Instagram to work on
3 problematic use, right?

4 A. That's what it says, yes.

5 Q. Okay. So in total, your request sought 45
6 new positions, including 20 engineers, right?

7 A. That's what -- yes, that's what it -- yep.

8 Q. And in the next paragraph you say that you
9 "recommend at a minimum staffing these up for 2022."
10 Right?

11 A. Yes.

12 Q. And if we look at the chart below, we see
13 that this request is in fact the minimum
14 recommended, right? That's in the middle column?

15 A. Yes.

16 MR. IMBROSCIO: If I may, Megan, just -- the
17 print is really small.

18 MS. O'NEILL: Oh, sorry.

19 MR. IMBROSCIO: Just to let the --

20 THE WITNESS: Oh, here you can see it, yes.

21 MR. IMBROSCIO: You can see it a little bit
22 better on here --

23 THE WITNESS: Oh, yeah.

24 MR. IMBROSCIO: -- as a general matter.

25 Sorry.

1 A. Sorry. I was --

2 MR. IMBROSCIO: Mr. Clegg and I are about
3 the same age and probably have the same issues
4 with reading small print.

5 A. I was squinting. Yes, I can see that, yes.

6 Q. Great. And then the ideal option is
7 actually 40 XFN and 84 ENG, right?

8 A. That's what it says.

9 Q. So more than double in total than the
10 minimum recommended, right?

11 A. That's what it says, yes.

12 Q. Okay. And looking at those top boxes, the
13 ideal option would fully centralize and staff up all
14 topics and product gaps for the four priority topics
15 we discussed, right?

16 A. That's what it says.

17 Q. And the minimum recommended would not,
18 right?

19 A. It doesn't say that. It -- I mean, I can
20 only read what it says here. It describes it
21 somewhat differently to the ideal thing.

22 Q. We -- yeah, we can go through that more --
23 in more detail. It says that it would -- the
24 minimum recommended approach would "centralize
25 tracking across all topics, and strategy and

1 measurement for Problematic Use and Connections"
2 only.

3 Right?

4 A. Yes.

5 Q. It would "staff up Problematic Use product
6 work across Facebook and Instagram," but not the
7 other priority topics, right?

8 A. That's what's implied, yes.

9 Q. Okay. And this request, again, was made in
10 August, right?

11 A. Yes, in keeping with, as I say, exceptional
12 out-of-cycle contingency requests, it was made in
13 August. The normal annual cycle of -- I can't
14 remember what the calendar is but it was -- it was
15 at a different time of the -- a different time of
16 the year, so this was out of that normal annual
17 headcount allocation exercise.

18 Q. And just to refresh ourselves on this
19 e-mail, at the top of the page it was a request for
20 "additional investment to strengthen our position on
21 wellbeing across the company," right?

22 A. That's what it says in the first sentence,
23 yes.

24 Q. And in the next paragraph, first line, you
25 describe this work as urgent, right?

1 A. In the context of the concerns expressed by
2 policymakers that I describe in that paragraph.

3 Q. Okay. And in the paragraph further down,
4 starting "Nonetheless," you said: "We need to do
5 more and we are held back by a lack of investment on
6 the product side."

7 Right?

8 A. That's the -- that's what the sentence says,
9 yes.

10 Q. Okay. But Mr. Zuckerberg didn't reply to
11 this urgent request in August, right?

12 MR. IMBROSCIO: Object to the form.

13 A. Well, I'm not sure whether he did or not by
14 e-mail but -- yeah, I would have had, at the time,
15 ongoing contact with Mr. Zuckerberg as CEO, so...

16 Q. He didn't reply to your e-mail as shown in
17 this document, right?

18 A. Not that I -- not that I see here, no.

19 Q. Let's look at that first page. You write
20 again to Mr. Zuckerberg in November, right?

21 A. Yes, November the 10th.

22 Q. Okay. And then if we flip to the next page,
23 in the paragraph starting "Funding the central
24 product team," you say that your original ask from
25 August of 25 XFN and 20 ENG was not funded, right?

1 A. That's what it says, yes.

2 Q. And that's your understanding, it was not
3 funded?

4 A. Yes. As I say, it was -- this was a --
5 yeah, this was a contingency out-of-cycle request.
6 It would be pretty -- I mean, this was always --
7 it's always a difficult thing to get additional
8 headcount in any material way outside of the normal
9 budget allocations, so it would have come as no
10 surprise to me at all that original ask was not
11 funded.

12 Q. And who decided to not fund it?

13 A. Well, it would have been a decision which
14 the CFO, who is responsible for the overall
15 allocation of resources, would have been involved
16 in, but, as I say, both the CFO and the CEO, Mark
17 Zuckerberg, would receive numerous requests from
18 across the company outside the normal all -- and as
19 a matter of good sort of housekeeping, I think they
20 always made it quite clear that they would set the
21 bar very high for those exceptional contingency
22 requests to be met.

23 Q. And I understand the context but, to your
24 understanding, who made the decision to not fund
25 this request?

1 A. Well, since I don't have the -- since I
2 don't have the full thread here, I can see that
3 later on the CFO, Susan Li, replies that the -- she
4 says: "I'll defer to Mark on the decision here (and
5 we have a budget meeting on Monday), but
6 unfortunately, XFN heads are running more
7 constrained than engineering."

8 Q. So just going back to the August request as
9 opposed to the later one you make in November, do
10 you know who made the decision to not fund that
11 request?

12 A. I'm assuming it must have been communicated
13 to me, if not by e-mail then by Susan Li. I
14 honestly -- I can't -- I can't recall it. As I say,
15 it was a contingency request amongst many, so...

16 MS. O'NEILL: Okay. Let's go to Document
17 18, and we'll mark this as Exhibit 16. It is
18 Bates stamped META3047MDL-003-00188992.

19 (Meta - Clegg Exhibit 16 was marked for
20 identification.)

21 THE WITNESS: Right.

22 MR. IMBROSCIO: 16?

23 MS. WANG: 18 or -- sorry.

24 MS. O'NEILL: Of, 16, 16.

25 MR. IMBROSCIO: Exhibit 18 is -- or

1 Document 18 is Exhibit --

2 MS. O'NEILL: It's my Document 18 but it is
3 Exhibit 16.

4 MR. IMBROSCIO: You're killing, Megan.

5 MS. O'NEILL: I know. I usually use letters
6 and I decided numbers this time. It was not a
7 good idea.

8 MR. IMBROSCIO: We'll take it as 16.

9 MS. SINGER: It means a need for a break.

10 MS. O'NEILL: We're getting close.

11 MR. IMBROSCIO: After this doc, we'll take a
12 break.

13 BY MS. O'NEILL:

14 Q. Mr. Clegg, do you recognize this document?

15 A. I do.

16 Q. And what is it?

17 A. Can I just read it quickly?

18 Q. Sure. And I'll let you know I'm only going
19 to be asking questions on the first three pages, so
20 not on the text of the article that's attached or
21 that's reproduced.

22 A. Okay.

23 Yes, thanks.

24 Q. Okay. What is this document?

25 A. This is a series of e-mails in September

1 2021, between myself and various folk at Meta.

2 Q. Okay. And so this was about a month after
3 the August 2021 headcount request we were just
4 discussing, right?

5 A. Yes.

6 Q. And this e-mail chain involves a Wall Street
7 Journal article, correct?

8 A. Yes.

9 Q. Okay. If we look at Page 2, at the very
10 bottom we see an e-mail from Andy Stone, right?

11 A. Yes.

12 Q. And on the next page we see the text of that
13 e-mail. The first line, Mr. Stone says: "I wanted
14 to share the full text of the Wall Street Journal's
15 story about Instagram youth research."

16 Right?

17 A. Yes.

18 Q. And then he does reproduce the text of that
19 article and the article is titled "Facebook Knows
20 Instagram Is Toxic For Teen Girls, Company Documents
21 Show." Right?

22 A. That's what it says, yes.

23 Q. Going back to that previous page, Mr. Stone
24 sent this e-mail to several people and he copied the
25 Small Group.

1 A. Yes.

2 Q. Are you a part of the Small Group?

3 A. Yes.

4 Q. And what is the Small Group?

5 A. Small Group is, as the name implies, just
6 the handful of sort of senior executives in the
7 company who run the company in its various ways.

8 Q. And who is in -- who else is included in
9 that Small Group aside from you?

10 A. Oh, the CFO, the CMO, the CTO, the COO, the
11 general counsel, the head of AR/VR, the app leads.
12 It's changed a lot. It's sometimes not been that
13 small and then it got small again, so sometimes it's
14 a bit of a misnomer, to be honest, but...

15 Q. It doesn't sound very small.

16 A. No.

17 Q. Okay. If we look at the first page of the
18 document, at the very bottom we see that there is an
19 e-mail from Pratiti Raychoudhury, right?

20 A. Hm-hmm.

21 Q. And who is Ms. Raychoudhury?

22 A. Pratiti Raychoudhury, at that time, had
23 responsibility for some of the research functions in
24 the company.

25 Q. If we look at Ms. Raychoudhury's e-mail at

1 the top of the second page --

2 A. Yes.

3 Q. -- and in particular the second paragraph of
4 her e-mail --

5 A. Yes.

6 Q. She says: "I know I am preaching to the
7 choir, but given last week's events, I feel even
8 more convinced that we need to make more progress on
9 the well-being on the product side."

10 Right?

11 A. That's what it says, yes.

12 Q. And by last week's events, you understood
13 her to mean the publication of the Wall Street
14 Journal article?

15 A. Yes. I think as per her first sentence, the
16 preceding sentence, I had responded publicly to the
17 Wall Street Journal article. I remember being, as I
18 still am, incensed by the headline because it is
19 absolutely not what the company documents show at
20 all. I thought it was a grotesque
21 mischaracterization of our work and of the research
22 that we did. So she was clearly thanking me for
23 having responded in that way, and then went on to
24 say that she wanted -- she felt this was a, you
25 know, this was a catalyst for her to repeat her

1 views that more work could be done.

2 Q. Okay. So again, she said she feels "even
3 more convinced that we need to make progress on
4 well-being on the product side."

5 Right?

6 A. That's what it says, yes.

7 Q. And then she says: "From everything I am
8 hearing (second hand) that there will be no
9 headcount."

10 Right?

11 A. That's what it says.

12 Q. Did you understand this to refer to the
13 headcount request that we were just discussing?

14 A. I assume so.

15 Q. And that was the one that was not funded,
16 right, in August?

17 A. Well, I clearly had questions because I then
18 reply to her asking under whose headcount ask would
19 this have been included, so I think I -- I think I
20 was a little confused what she was referring to.

21 Q. Going back to her e-mail, she then says
22 that: "The plan that the team had put together is
23 bare minimum to get us to parity with TikTok."

24 Right?

25 A. That's what it says, yes.

1 Q. Did you understand her to mean parity with
2 what TikTok was doing in the well-being space?

3 A. I assume she meant whatever that is included
4 in that link but I don't -- I can't -- I can't
5 remember what the -- what that link alludes to.

6 Q. And the link says "TikTok expands mental
7 health resources," right?

8 A. Yes.

9 Q. Moving to Page 1, and looking at your e-mail
10 at 3:11 p.m., toward the top, you ask about the
11 timing of the H/C cycle, right?

12 A. Yes.

13 Q. That's, just to be clear, that's headcount
14 cycle?

15 A. Yes.

16 Q. And you ask whether there is an ask that you
17 could resurface, right?

18 A. Yes.

19 Q. And in fact, you did resurface an ask for
20 well-being headcount later that year, as we were
21 just discussing?

22 A. In November, yeah.

23 Q. And I know we said we would take a break but
24 I am just going to return to that last --

25 A. Sure.

1 MR. IMBROSCIO: No, absolutely fine, yeah.

2 Q. -- exhibit. So I think it makes sense to --

3 MR. IMBROSCIO: Whenever you're ready.

4 A. Back to that document?

5 Q. Yeah.

6 A. The previous one?

7 Q. Yeah. So that was Exhibit 15.

8 A. Yep.

9 Q. And we'll be quick and then we can --

10 A. Sure.

11 Q. -- we can all break. Okay. So just to
12 reorient ourselves, this was -- this is the e-mail
13 chain that we had been discussing that contains your
14 headcount request, right?

15 A. Yes.

16 MR. IMBROSCIO: Exhibit 15.

17 MS. O'NEILL: Exhibit 15, that's correct.

18 Q. And as we discussed earlier, you wrote again
19 to Mr. Zuckerberg in November, right? That's on the
20 first page of the document.

21 A. On November the 10th, yes.

22 Q. And you said: "Circling back re: investment
23 needed to strengthen Meta's position on well-being."
24 Right?

25 A. Yes.

1 Q. And then you say: "This investment is
2 important to ensure we have the product roadmaps
3 necessary to stand behind our external narrative of
4 well-being on our apps."

5 Right?

6 A. Yes.

7 Q. Okay. And then going to the second page, at
8 the top you say: "A number of us have met and
9 agreed upon a revised investment proposal."

10 Right?

11 A. Yes.

12 Q. Who did you meet with?

13 A. I can only conjecture that it would have
14 been with those who originally surfaced the proposal
15 for this contingency headcount ask to me, so KX,
16 Pratiti, and others, but I can't -- I can't tell you
17 with any greater precision exactly whom I met and
18 when.

19 Q. And you all agreed on two points, right?

20 A. That's what it says, yeah.

21 Q. Can you read the first point?

22 A. Do you mean the XFN points? There are
23 two -- there are two two points.

24 Q. Yeah. Thank you for asking to clarify. I
25 actually mean the first of the two points, so

1 "Agreement on..."

2 A. Yeah. So Number 1: "Agreement on the need
3 to fund a central product team to organize
4 cross-company strategy, execution and measurement
5 (as per our approach to other societal issues or
6 privacy).

7 "2. Alignment that product work must map to
8 and support our external narrative (as part of
9 Project Beyond.)"

10 Q. Okay. In looking at Point 1, you meant --
11 you were referring to a centralized team to make
12 sure that well-being strategy, execution and
13 measurement is organized and consistent across the
14 entire company, right?

15 A. Yeah. It's the same theme, that I clearly
16 was anxious that the company should act more as the
17 sort of sum of its parts. I think it was quite a
18 sort of consistent matter of organizational
19 observation on my part, that -- which is, I think,
20 not unsurprising in most complex organizations, that
21 sometimes people need to be cajoled into working
22 more in harness with each other, yeah.

23 Q. And then moving to 2, which, just to refresh
24 ourselves, was "alignment that product work must map
25 to and support our external narrative," right?

1 And by this you meant that, you know,
2 ensuring that Meta does what it says it does
3 externally and vice versa, making sure that those
4 two aspects match up, right?

5 MR. IMBROSCIO: Object to the
6 characterization.

7 A. I have to say I'm not -- I'm not entire -- I
8 can't -- I genuinely can't remember what Project
9 Beyond was, because I suspect you're going to ask me
10 what it was.

11 Q. Yes.

12 A. I honestly can't remember. There are so
13 many acronyms and labels and names. I just
14 genuinely don't know what that meant, and I suspect,
15 again, because of my responsibility for how the
16 company explained itself, amongst other things, and
17 showed up externally, that I just -- I guess I
18 wanted some work to be done to make sure that, you
19 know, the left hand was knowing what the right hand
20 was doing.

21 So I think both -- I think both items, in a
22 sense, relate to the same thing but I just wanted
23 closer -- I wanted the sort of stitching between the
24 different teams' products, presentational and
25 otherwise, to be -- to be brought more closely

1 together.

2 Q. Looking at the next paragraph, you note that
3 "Funding the central product team remains our
4 biggest gap."

5 Right?

6 A. Yes.

7 Q. And then in the following paragraph, because
8 your August request was denied, you scaled down the
9 request, right?

10 A. That's what it says, yes.

11 Q. And you -- that's what you wrote, right?

12 A. Yes, yes, yes.

13 Q. And you gave two options, right?

14 A. I'm not sure they're options. I think I --
15 I think they're -- are they options? I think -- it
16 just says "make necessary progress in two ways," so
17 I'm not sure if they're an either/or. Is what you
18 were suggesting, an either/or?

19 Q. That's what I am suggesting.

20 A. Ah.

21 Q. And I'm wondering if that's your
22 understanding as well.

23 A. Can I just read it again?

24 Q. Yes, feel free.

25 A. Sorry. I stand corrected. Yes, they are

1 either/or. So one is a slightly more maximist
2 version of the other, yeah.

3 Q. Great. And just to go through those
4 quickly, the first option is 25 XFN and zero ENG,
5 meaning engineering, to form a central well-being
6 product pod with two topic pods within it. Right?

7 A. That's what it says, yeah.

8 Q. And then the second option is for 7 XFN and
9 zero engineers, and that would be only for a central
10 well-being pod, right?

11 A. Yep.

12 Q. And you describe that as, in the last line,
13 "the bare minimum needed to meet policymaker
14 inquiries." Right?

15 A. That's what it says, yeah.

16 Q. Flipping to Page 1 of the document, there is
17 an e-mail from Naomi Gleit, right?

18 A. Hm-hmm.

19 Q. And who is Ms. Gleit?

20 A. Naomi Gleit is, again, one of the most
21 long-standing employees in the company, has done
22 various roles. I have a feeling she worked, at that
23 time, as a sort of central product and sort of
24 central issues role, and I certainly recall that she
25 oversaw a central team dealing with a number of what

1 I'd loosely call social issues.

2 Q. Okay. And she writes in her e-mail: "Mark,
3 for what it's worth, this is my #1 'below the line'
4 project to fund on Social Impact."

5 Right?

6 A. Yes.

7 Q. And she says: "We've also scaled this
8 request back to ask for XFN only and zero engineers
9 given there are none."

10 Right?

11 A. Yes.

12 Q. And then, as you noted earlier, Susan Li
13 then says that she will defer to Mr. Zuckerberg on
14 the decision here, right?

15 A. Yes.

16 Q. And Ms. Li was a member of Meta's finance
17 department, right?

18 A. She's now the CFO. I don't know at what
19 point she became CFO. Maybe -- maybe she was in
20 effect the deputy CFO at the time. Is that right?
21 I can't remember when she made the transition.

22 Q. I don't recall either.

23 A. Yeah.

24 Q. Regardless, she was -- whether she was CFO
25 or not, she was in the finance department, right?

1 A. Yes, yes, yes.

2 Q. And she states that there was a budget
3 meeting that Monday, right?

4 A. An upcoming meeting.

5 Q. Oh, yes, there was going to be a budget
6 meeting on Monday.

7 A. That's what it says, yeah.

8 Q. Were you at that meeting?

9 A. I can't remember, and I'm not -- I wouldn't
10 normally be there. I wouldn't normally seek to -- I
11 always have enough meetings, so I was never keen to
12 jump into additional ones. I don't think that was a
13 meeting I would normally -- I think normally that
14 would be a meeting with Mark and the CFO and the
15 finance team, maybe the COO, but it usually wasn't
16 a -- it wasn't a big meeting.

17 Q. Okay. And, ultimately, this request in
18 November for additional headcount was denied, right?

19 A. It did not happen in this form, no, it
20 didn't. I -- my recollection of it is, but again,
21 you may have material which will jog my memory more,
22 but my recollection of it is that we did make --
23 well, firstly, I remember there was a debate about
24 whether the sort of central coordinating function
25 that I advocated in both the notes in August and

1 November was really necessary given that there were
2 some central teams already. So there was an
3 organizational debate about whether this was
4 actually duplicative of some central functions that
5 already existed; and that, secondly, that a number
6 of sort of headcounts were moved around from
7 existing teams to do a lot of this work, which, of
8 course -- I mean, the records show -- I think by - I
9 think within weeks we were -- we were announcing new
10 measures related to well-being on Instagram, like
11 "Take a Break" and, you know, really important tools
12 like that, so clearly the work continued and the
13 resources were found to do the work. Sorry.

14 Q. Yeah. But just to be clear, no headcount
15 was allocated as part of this request that you made,
16 right?

17 A. This contingency request, not in exactly the
18 form this was required but, to be honest, I -- my
19 philosophy always was it's far more important than
20 all this internal sausage making, you know,
21 interaction is what is the out -- final outcome. Is
22 the product changing and evolving? Is the company
23 doing the work? Is the research being commissioned?
24 Are there new tools for well-being, for kids, for
25 parents, being shipped? And the answer to all of

1 that was yes, so that was certainly my recollection
2 of that period of time.

3 Q. And who made the decision to not allocate
4 headcount per your request?

5 A. Well, as before, I can't remember how it was
6 communicated. It would have been communicated
7 through the finance department. Who exactly took
8 the decision in the -- was it a recommendation from
9 the finance department, was it a decision that Mark
10 Zuckerberg made? It would clearly be a decision
11 taken by the CFO and the CEO with the CEO, of
12 course, with final authority.

13 Q. So the CF -- excuse me. Mr. Zuckerberg had
14 final authority, right?

15 A. Well, he's the CEO and the founder of the
16 company, so, yes, of course he has a considerable
17 amount of authority, but you're asking me a much
18 more specific question, which is who adjudicated on
19 this specific altered requested, altered from August
20 in November in a meeting that I was not in and for
21 which I don't have a -- at least a recollection of
22 exactly how it was communicated to me. I just can't
23 answer that question. It would have been a
24 culmination of those people.

25 Q. Then --

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1 A. But by -- sorry, but I should stress but by
2 the sounds of it, the CFO or if it was Susan Li, the
3 Deputy CFO at that time, did not look favorably on
4 the request before it was even being discussed with
5 Mark Zuckerberg.

6 MS. O'NEILL: Okay. I think that's all the
7 questions I have on this document, so probably a
8 good time to take a break.

9 THE VIDEOGRAPHER: All right. We are going
10 off the record at 12:45 p.m.

11 (Recess from 12:45 p.m. until 1:30 p.m.)

12 THE VIDEOGRAPHER: We are back on the record
13 at 1:30 p.m.

14 BY MS. O'NEILL:

15 Q. Good afternoon, Mr. Clegg.

16 A. Good afternoon.

17 Q. We're going to dive back into some
18 documents.

19 MS. O'NEILL: So can you pull up 42.A? And
20 this is going to be marked as Exhibit 17, and it
21 is Bates stamped META3047MDL-064-00000101.

22 (Discussion off the record.)

23 (Meta - Clegg Exhibit 17 was marked for
24 identification.)

25 BY MS. O'NEILL: