

Exhibit 115

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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 - ATTORNEYS' EYES ONLY
PURSUANT TO PROTECTIVE ORDER
VOLUME 1

VIDEO-RECORDED
DEPOSITION OF SHAYLI JIMENEZ
(Pages 1 - 356)

Covington & Burling
415 Mission Street, San Francisco, California
Tuesday, February 11, 2025, 9:12 a.m.

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REPORTED BY: ELAINA BULDA-JONES, CSR 11720

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Page 274 1 Chat. 2 BY MR. PHELPS: 3 Q. And presumably it's because you thought 4 this image was relevant to Instagram, right? 5 A. I wouldn't say that necessarily. 6 Q. Okay. And, Jim, can you expand the Chat 7 just a little bit more. 8 So let's just break that down. 9 You say [as read]: 10 Oh, my gosh, y'all, IG is a drug. 11 Right? 12 A. Yes. 13 Q. And then [REDACTED] says [as read]: 14 LOL, I mean, all social media. 15 Right? 16 A. Yes. 17 Q. And you say [as read]: 18 Seriously, it is! We are causing reward 19 deficit disorder because people are binging on IG so 20 much they can't feel reward anymore, like the reward 21 tolerance is so high. 22 Right? That's what you say here? 23 A. That's what I said. 24 Q. And then you shared this image, right? 25 A. Yes.	Page 276 1 our users. 2 Q. But in the context -- you are saying in 3 this casual Chat you said, quote [as read]: 4 We are causing reward deficit disorder 5 because people are binging on IG so much they can't 6 feel reward anymore. 7 And you are -- your testimony is that is 8 just a casual statement? 9 A. There is a shared context amongst us 10 researchers in this Chat. Believe it or not, we 11 throw around hypotheses, frameworks, and things like 12 this on a pretty normal, regular basis to spark 13 conversation, to provoke thought, to inform new 14 hypotheses and the like. So this is not to imply 15 that this is a real thing. This is a casual 16 conversation amongst us researchers, who -- like I 17 said, this is contextual to another conversation 18 that we had had before. 19 Q. Okay. And do you see the word 20 "hypothesis" anywhere in this Chat? 21 A. It's not in this Chat, but, like I said, 22 there is a shared context and a shared understanding 23 among researchers. These are all researchers in 24 this conversation. 25 Q. Okay. And so a hypothesis that you are
Page 275 1 Q. And my question to you is, you thought 2 this image was relevant to this discussion about IG 3 being a drug and causing reward deficit disorder, 4 right? 5 A. I wouldn't put it like that. I shared 6 this image to basically provide some sort of 7 explanation for why people may not be enjoying 8 Instagram, because we had previous discussions about 9 people not -- about increasing the value that people 10 get out of Instagram. 11 Q. And one reason people may not have enjoyed 12 Instagram is because they had fallen into the cycle 13 illustrated in this schematic. 14 Is that what you are saying? 15 MS. BARNHART: Object to the 16 characterization. 17 THE WITNESS: I don't know that at all. 18 BY MR. PHELPS: 19 Q. That was a hypothesis you were sharing 20 with your colleagues, right? 21 A. In the context of this Chat, it's not a -- 22 it's not a hypothesis that I was seriously 23 considering. It's just a casual Chat. Like I said, 24 that was following on another conversation about 25 people trying to increase the value of Instagram for	Page 277 1 throwing out there for discussion is that IG is a 2 drug? That's your testimony? 3 A. No. 4 Q. What did you mean when you said "IG is a 5 drug"? 6 A. When I said, "Oh, my gosh, y'all, IG is a 7 drug," it's -- you see I started the conversation. 8 It's to grab their attention. It's a joke. 9 Q. You thought this concept that IG was a 10 drug was a joke? 11 A. In this context, shared between myself and 12 other researchers, it's a hyperbole for some 13 problems that we were discussing around needing to 14 possibly increase the value that users were getting 15 from Instagram. 16 Q. Okay. And you say, you followup, the next 17 thing you say after IG is a drug is "seriously, it 18 is," exclamation mark, right? 19 A. Yes. 20 Q. And you don't say JK, LOL, right? 21 A. I don't need to say JK, LOL. As you can 22 see, [REDACTED] said LOL and made another hyperbolic 23 statement. So it's implied. 24 Q. Okay. Either way, you put this -- as part 25 of this lighthearted conversation, you put in a

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Page 278 1 schematic about addiction that originated from an 2 academic article analyzing alcohol addiction, right? 3 MS. BARNHART: Object to the 4 characterization. 5 THE WITNESS: I -- like I mentioned, I 6 never saw that article. So where it came from, that 7 is irrelevant to this conversation. And as I 8 mentioned before, this type of Chat amongst 9 researchers is very, very common in the sense of 10 sharing things we find, sparking ideas, and 11 conversation around it. 12 BY MR. PHELPS: 13 Q. Okay. And was -- was your decision to 14 share this schematic, was that a -- kind of a 15 continuation of the joke? 16 MS. BARNHART: Object to the form. 17 Characterization. 18 THE WITNESS: In a way. It's to continue 19 the thought, but the conversation -- it's not that 20 the whole conversation is a joke, but it is a casual 21 conversation amongst researchers exchanging ideas 22 and hypotheses. 23 BY MR. PHELPS: 24 Q. I want to make sure I understand, because 25 you said -- I'm looking at your testimony. You	Page 280 1 many times. 2 BY MR. PHELPS: 3 Q. Okay. Let's go to the next. You say [as 4 read]: 5 We are causing reward deficit disorder 6 because people are binging on IG so much that they 7 can't feel reward anymore, like their reward 8 tolerance is so high. 9 Is that statement serious or is that 10 statement a joke? 11 A. That statement is not a fact or anything 12 researcher-based. It's a hypothesis I'm throwing 13 out there as a follow-on to the joke, jokingly, but 14 something to share, to share with my like-minded 15 research colleagues. These are things that we 16 exchanged amongst -- exchange among each other 17 often, our frameworks and different artifacts. 18 Q. Okay. And so -- when you share this 19 image, is this image, to your mind, a continuation 20 of the joke or is this serious? 21 MS. BARNHART: Object to the form. 22 THE WITNESS: In the context of this Chat, 23 it is additional -- additional content for the 24 conversation that we're having. 25 ///
Page 279 1 said, "When I said, oh, my gosh, y'all, IG is a 2 drug, I started the conversation to grab their 3 attention. It's a joke." 4 So the first sentence is a joke, right? 5 A. The first sentence is a conversation 6 starter. 7 Q. It's not a joke or it is? 8 A. It's -- depends on how you define a joke. 9 The way that I'm defining a joke is saying something 10 exaggerated, something that is going to catch their 11 attention. 12 Q. Okay. Well, you testified that that 13 sentence was a joke. 14 So how did you mean that? 15 A. Like I just said, it's an exaggeration. 16 It's a hyperbole. It's a joke in that it's an 17 exaggerated statement to catch their attention. 18 Q. Okay. When you say "seriously, it is!" 19 is that still part of the joke? 20 A. That is still part of the way that we 21 converse in the sense of exaggeration or 22 exclamation. 23 Q. So it is part of the joke still? 24 MS. BARNHART: Object to the 25 characterization. Asked and answered many, many,	Page 281 1 BY MR. PHELPS: 2 Q. And is it part of the joke or not? I'm 3 just trying to understand that. 4 MS. BARNHART: Object to the form. Asked 5 and answered. 6 THE WITNESS: So what I was explaining is, 7 amongst researchers, we share different artifacts 8 and frameworks and content that are relevant -- like 9 this is relevant to the conversation. The 10 conversation is started off in a big exaggerated 11 way, and this chart just follows on to that. 12 BY MR. PHELPS: 13 Q. Okay. So we're transitioning to a more 14 serious part of the discussion? Do I understand 15 that? 16 A. It's more serious in the sense that we are 17 considering the chart or we're continuing the 18 conversation, and it's not all of -- it's not just 19 me grabbing their attention. I have their 20 attention. Now we're discussing. 21 Q. Now we're taking it a little more 22 seriously, because you thought this chart was 23 relevant to Instagram, right? This is a discussion 24 about Instagram? 25 MS. BARNHART: Objection to the

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Page 282 1 characterization. Asked and answered. 2 THE WITNESS: I am not going to say that 3 this chart is relevant to Instagram because this 4 chart has no basis in any Instagram research or 5 data. It's just a chart that is demonstrative of 6 what I mentioned earlier, about reward deficit 7 disorder, so to provide some additional context to 8 what I'm talking about in the previous statement. 9 BY MR. PHELPS: 10 Q. And the previous sentence says "we," 11 meaning IG, "are causing reward deficit disorder," 12 right? Is that right? 13 A. So I'm saying we, referring to Instagram, 14 are causing reward deficit disorder. But this is 15 not a validated statement. Like I said, it's a 16 hypothesis. It's an idea. It's a thought that I'm 17 throwing out there to my fellow researcher 18 colleagues. 19 Q. Got it. 20 Let's unpack this schematic a little bit. 21 The arrow at the top is preoccupation and 22 anticipation. 23 Do you see that? 24 A. Yes. 25 Q. Okay. And you would agree that -- would	Page 284 1 Q. Okay. And so we see binge intoxication 2 here. And then the arrow between preoccupation and 3 anticipation towards binge intoxication is -- the 4 executive function disorder. 5 Do you see that? That's the arrow that 6 connects those first two boxes. 7 A. Yes. 8 Q. And then from binge intoxication, there is 9 another arrow to withdrawal negative affect. Do you 10 see that? 11 A. Yes. 12 Q. And there, kind of under that arrow, is 13 this concept rewards deficit disorder, right? 14 A. Yes. 15 Q. And that's getting -- you say in the 16 Chat -- you describe reward deficit disorder as 17 people effectively can't feel rewards anymore. 18 Their tolerance is too high. 19 Right? 20 A. What I'm referring to in this Chat, as it 21 pertains to Instagram, is that people are getting 22 content, they receive content, and after some time, 23 that content -- the content that we're giving them 24 isn't giving them value anymore. 25 Q. And the reward tolerance is so high,
Page 283 1 you agree that users could become preoccupied or 2 have anticipation for Instagram? 3 A. I don't know. 4 Q. You don't. Okay. 5 A. I don't know. 6 Q. And then the -- there is an arrow from 7 preoccupation and anticipation to binge 8 intoxication. 9 Do you see that? 10 A. Yes. 11 Q. And you -- that concept of bingeing comes 12 up in your Chat. You see that, right? People are 13 bingeing so much on IG. 14 Do you see that? 15 A. Yes. 16 Q. And so you had an understanding that 17 people could binge on Instagram, right? 18 MS. BARNHART: Object to the 19 characterization. 20 THE WITNESS: I don't know that to be -- I 21 don't know that. 22 BY MR. PHELPS: 23 Q. But you said people are bingeing on IG, 24 right? You said that? 25 A. I'm speaking from my own experience.	Page 285 1 right? 2 A. I don't know that. 3 Q. Okay. But that's what you said, right? 4 A. Like I said, the context of this Chat is 5 throwing out an idea to my fellow research 6 colleagues, somewhat jokingly, about why people may 7 be less satisfied on Instagram now. 8 Q. Okay. And so this part -- so when you're 9 talking about this chart, this is -- you are taking 10 this chart somewhat jokingly? 11 A. I can't take it completely literally and 12 it wasn't intended to be literal to Instagram 13 because I've -- I have no studies or data that have 14 ever tried to track this or, like, see if this 15 exists on Instagram. I don't know. 16 Q. You don't know whether that's been tested 17 or not? 18 A. I don't know. 19 Q. Okay. We see from withdrawal negative 20 affect to stress surfeit disorder, right? 21 A. Yes. 22 Q. And that takes us back to the top of the 23 circle, right? 24 A. Yes. 25 Q. Do you know if users might experience

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Page 318 1 when you said [as read]: 2 I know Adam doesn't want to hear it. He 3 freaked out when I talked about dopamine in my teen 4 fundamentals leads review but it's undeniable. 5 Were you telling the truth when you wrote 6 that? 7 MS. BARNHART: Object to the form. 8 THE WITNESS: I may have been 9 exaggerating, the way that I've been, you know, 10 sensationalizing most of this conversation. 11 BY MR. PHELPS: 12 Q. Okay. And so you think this is further 13 sensationalism by you; is that right? 14 A. I -- I think it is, to some extent, an 15 exaggeration. 16 Q. Okay. And we've talked now many times 17 about references to dopamine in your teen 18 fundamentals review, right? 19 A. Yes. 20 Q. And you put a lot of work into that teen 21 fundamentals review, right? 22 A. Yes. 23 Q. You read a textbook, right? 24 A. I would not say I read that textbook 25 completely, but I referred to it, yes.	Page 320 1 Q. And what do you mean when you said, "He 2 freaked out when I talked about dopamine in my teen 3 fundamentals leads review"? 4 A. I don't remember exactly what I mean. I 5 just remember him having a reaction. 6 Q. Tell me about that reaction. 7 A. I don't remember what it was. It was just 8 a notable reaction when I used that term. 9 Q. And in what sense notable? 10 A. I -- I don't know, maybe he might have 11 made a face. I'm not sure. I don't remember 12 exactly what happened. 13 Q. Do you have any memory at all about his 14 response to that besides him maybe making a face? 15 A. I don't -- I honestly do not remember what 16 exactly his reaction was. I just remember him 17 having a reaction. 18 Q. Was it a negative reaction or a positive 19 reaction? 20 MS. BARNHART: Object to the form. 21 THE WITNESS: I'm not sure. I'm -- I 22 don't think it was positive but I can't remember 23 what the reaction was. 24 BY MR. PHELPS: 25 Q. Okay. That was your first -- that was
Page 319 1 Q. Yeah, and you read this teenage brain 2 book, too, right? 3 A. Yes, I did. 4 Q. Okay. And based on that review, you 5 included the word "dopamine" in your presentation 6 about teen fundamentals that went to IG leads, 7 right? 8 MS. BARNHART: Object to the 9 characterization. 10 THE WITNESS: I used the term "dopamine" 11 in my speaker notes, yes. 12 BY MR. PHELPS: 13 Q. Okay. And that was manifested in the 14 physical slides that we have been looking at today, 15 right? 16 A. What do you mean? 17 Q. The speaker notes are reproduced in the 18 slides that we have been looking at today, right? 19 A. Yes. 20 Q. Okay. And the reference here is to Adam 21 Mosseri when you talked about Adam freaked out, 22 right? 23 A. This is referring to Adam Mosseri. 24 Q. He's the head of Instagram? 25 A. Yes.	Page 321 1 within, like, your first half on Instagram, right? 2 A. Yes. 3 Q. And is going in front of IG leads, I mean, 4 that's a significant thing for an employee to do, 5 right? 6 You would agree with that? 7 A. Well, it depends on your role. 8 Q. For you, as a new member of the Instagram 9 team, I mean, that was, you know, a significant 10 moment as you are going into Instagram and trying to 11 establish your credibility, your first big 12 presentation to Mr. Mosseri, that was a significant 13 moment for you, right, professionally? 14 MS. BARNHART: Object to the form. 15 THE WITNESS: It was a milestone in the 16 workstream. 17 BY MR. PHELPS: 18 Q. Yeah. 19 A. Yes. 20 Q. And -- but you can't tell me -- you can't 21 tell me anything other than he might have made a 22 face about how he reacted to your presentation? 23 A. I don't want to make it up. I really 24 don't remember. 25 Q. Okay. Do you remember him saying anything

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