

Exhibit 174

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)

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)

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

Tuesday, January 28, 2025

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
Video-Recorded Oral Deposition of WENDY
GROSS PhD held at the offices of Covington &
Burling LLP, 3000 El Camino Real, 5 Palo Alto
Square, Suite 1000, Palo Alto, California,
commencing at 9:04 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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META3047MDL-003-00109348-META3047MDL-003-00109399



TALKING ABOUT SAFETY ON INSTAGRAM

Marketing Insights
May 2019

Wendy Gross, Marketing Insights
[REDACTED] Product Marketing

EXECUTIVE SUMMARY

- When users worry about safety on Instagram, they are more concerned for **other people** and not themselves.
- Across most markets, the same safety issues rose to the top: bullying and harassment, hacking, and mental health/SSI content.
- Users see **mental health** and **bullying** as closely linked to each other, and also to **social comparison**.
- On a personal level, users worry most about **privacy** and **control** over their experience. This includes:
 - The loss of control over content that they own, often by someone they know
 - Unwanted contact, particularly within Direct

PARENTS ARE THE KEY TARGET FOR SAFETY INFORMATION, BUT IT NEEDS TO REACH THEM AT THE RIGHT TIME AND PLACE



Why parents	How to reach them	What they already know
• Parents had the most safety concerns about Instagram, particularly in relation to the safety of their teens. • Parents don't talk to their teens about safety concerns before they arise; they wait until issues arise before addressing them. • Nearly all parents we spoke to had joined Instagram to monitor their kids.	• Parents seek out information about safety when they need it. An internet search is often the first resource. • Safety information from traditional media outlets doesn't always stay with parents. • TV series, such as <i>Law and Order: SVU</i> or <i>Dr. Phil</i> fuel concerns about safety.	• Most of the parents we talked to are unaware of the Instagram Parents' Guide. • However, they are beginning to use Instagram and are aware of safety tools on the app. • Private accounts • Reporting • Turn off comments