

Exhibit 112

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No.
IN RE: SOCIAL MEDIA ADOLESCENT 4:22-MD-03047-YGR
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

This Document Relates To:

ALL ACTIONS

CONFIDENTIAL - ATTORNEYS' EYES ONLY
PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF
ALLISON L. HARTNETT

Held At: Covington & Burling LLP
Salesforce Tower
4415 Mission Street
San Francisco, California

June 16th, 2025
9:59 a.m.

Reported By:
MAUREEN O. POLLARD, CSR #14449, RDR

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1 age of the users in a moment, but let's just talk
2 about how Meta knows what age its users are.

3 So prior to December of 2019, Meta did
4 not require new users of Instagram to enter their
5 age to create an account, correct?

6 A. That's correct.

7 Q. Okay. And prior to the time in
8 December 2019 when Meta required new users of
9 Instagram to enter their age to create an account,
10 did Meta ask those users what their age was at all?

11 MR. CHAPUT: Object to the form.

12 THE WITNESS: Sorry, can you repeat the
13 question? I was just reviewing my notes.

14 BY MR. OLSZEWSKI-JUBELIRER:

15 Q. Prior to when Meta started collecting
16 users' age on signup in December 2019 on Instagram,
17 did Meta ask new users of Instagram to say what
18 their age was at all?

19 MR. CHAPUT: Object to the form.

20 THE WITNESS: Not that I'm aware of.

21 BY MR. OLSZEWSKI-JUBELIRER:

22 Q. Did it ask -- did Meta ask those users
23 in this period prior to December 2019, new users of
24 Instagram, to state that they were over 13?

25 MR. CHAPUT: Object to the form.

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1 BY MR. OLSZEWSKI-JUBELIRER:

2 Q. So we've establish that in May 2022,
3 Meta started requiring all existing users of
4 Instagram to provide an age, right?

5 A. Yeah.

6 Q. So in the period before that there was
7 a number of people who had accounts that did not
8 have a stated age associated with them, right?

9 A. That's right.

10 Q. My question is, did Meta's practices
11 for collecting data from those users differ from how
12 Meta collected data from users who did provide a
13 stated age?

14 MR. CHAPUT: Objection to form and
15 scope.

16 THE WITNESS: Not that I'm aware of.

17 BY MR. OLSZEWSKI-JUBELIRER:

18 Q. And you prepared to testify on behalf
19 of the company about Meta's data collection
20 practices, right?

21 A. Yes, I did.

22 Q. By talking to subject matter experts
23 who know about Meta's data collection practices?

24 A. Yes.

25 Q. Just going back to how Meta collects

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1 stated age from users, for Facebook there was a
2 period where when new users would create accounts on
3 Facebook, Meta's system defaulted to a birth date
4 that would make the user 25 years old, is that
5 right?

6 A. Yes, that's right.

7 Q. And what period -- during what period
8 of time did Meta default to an age that would make
9 the user 25 years old when they signed up for
10 Facebook?

11 A. I think it was 2017 to 2019.

12 Q. And prior to the default of 25 years
13 old for new users on Facebook, did Meta default to a
14 different age for new users who signed up for
15 Facebook?

16 A. So that is -- it's not straightforward
17 to answer simply because there were prior to 2017
18 multiple different versions of the age collection
19 flow that were tested on Facebook that varied
20 depending on the exact interface the user was using.
21 So there's Facebook app, Facebook desktop, there's a
22 version of Facebook that's a light version for low
23 data use internet, and those had different age
24 collection flows.

25 So each of those data collected age

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1 differently.

2 Q. Did any of those age collection flows
3 default to a particular age?

4 A. I do not know.

5 Q. Okay. And you prepared to testify on
6 behalf of the company -- you prepared to testify on
7 behalf of the company with respect to how Meta has
8 collected stated age from its users, right?

9 A. Yes.

10 Q. For Facebook and Instagram?

11 A. Yes.

12 Q. Going back to 2012?

13 A. Yes.

14 Q. So just going back to -- well, let's
15 talk about Instagram users.

16 A. Okay.

17 Q. Instagram users started being required
18 to state their age when signing up in December 2019,
19 right?

20 A. Sorry, can you say that again?

21 Q. Instagram users started being required
22 to state their age when signing up in December 2019,
23 right?

24 A. That's correct.

25 Q. At that time did Meta default to a

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1 visit public Facebook and Instagram pages without
2 having a Facebook or Instagram account, right?

3 A. I believe it's accurate to say that
4 people can do that. It's not -- you can't visit all
5 pages on Facebook or Instagram, but there are
6 specific public Facebook or Instagram pages people
7 can visit.

8 Q. Public pages that are posted by
9 accounts on Facebook and Instagram, right?

10 MR. CHAPUT: Object to form. Scope.

11 THE WITNESS: Yes, that's right.

12 BY MR. OLSZEWSKI-JUBELIRER:

13 Q. Does Meta collect personal information
14 from people who visit public Facebook and Instagram
15 pages without being logged into a Facebook or
16 Instagram account?

17 MR. CHAPUT: Object to form.

18 THE WITNESS: So I know you gave me the
19 list of personal -- how you're defining
20 "personal information." Meta would not --
21 we do not call that list personal
22 information. So my answer would be, no, we
23 don't, but let me give you precisely what
24 we do collect.

25 We consider this data activity data

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1 that only gives us information on how did
2 the user use that logged-out page. We
3 collect IP address, device ID, cookie data,
4 and then clicks. Yeah, we don't consider
5 that personal data.

6 BY MR. OLSZEWSKI-JUBELIRER:

7 Q. Okay. So you mentioned things like IP
8 address, cookie data, device ID, is that right?

9 A. That's right.

10 Q. And Meta collects those things from
11 users who visit public Facebook and Instagram pages
12 without being logged in, right?

13 A. Yes, that's right. I'm speaking
14 specifically about the registration pages, which is
15 the -- which is the most common logged-out page that
16 a user would visit. I think we should follow up if
17 it's exact same data collection on like a public
18 profile. Yeah.

19 Q. You don't know what data Meta collects
20 from people who visit a public Facebook profile, for
21 example, without being logged in?

22 MR. CHAPUT: Object to form.
23 Characterization, scope.

24 THE WITNESS: I don't -- I just don't
25 have the precise distinction in my notes on

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1 successfully appealed?

2 MR. CHAPUT: Object to the form.

3 Scope.

4 THE WITNESS: I don't have that data
5 point.

6 BY MR. OLSZEWSKI-JUBELIRER:

7 Q. Okay. You don't know or Meta doesn't
8 know?

9 MR. CHAPUT: Object to the form.

10 THE WITNESS: I don't know.

11 BY MR. OLSZEWSKI-JUBELIRER:

12 Q. Okay. Who at Meta would know?

13 A. [REDACTED].

14 Q. All right. Let's talk about account
15 linking. So we've talked about hard linking, right?

16 A. Yes, we talked about that.

17 Q. And hard linking is when a user tells
18 Meta that they have more than one account on the
19 platform, right?

20 A. Yeah, that's right.

21 Q. Okay. And Meta since December 2021
22 used that information to propagate its enforcement
23 on underage accounts across --

24 MR. CHAPUT: Object --

25 ///

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1 BY MR. OLSZEWSKI-JUBELIRER:

2 Q. -- accounts that are linked together?

3 MR. CHAPUT: Object to form.

4 Characterization.

5 THE WITNESS: Meta has done that at
6 least since late 2021. When I spoke to
7 Rohan, he said that it began prior to late
8 2021 -- sorry, prior to 2020, there was
9 some period where it broke, and then he
10 fixed it, so at least since late 2021 it
11 has been in use.

12 BY MR. OLSZEWSKI-JUBELIRER:

13 Q. Okay. And prior to 2020, that -- let's
14 see...

15 Prior to 2020 Meta did not -- sorry,
16 scratch that.

17 When two accounts are hard linked
18 together, Meta knows that they're operated by the
19 same person, right?

20 MR. CHAPUT: Object to form.

21 Characterization.

22 THE WITNESS: Actually, no. So even if
23 accounts are hard linked together, what it
24 means -- all we can say is, like, it means
25 that those people know each other or have

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1 A. The key use cases that Meta uses soft
2 matching for today are reporting on number of users
3 and financial statements, and also for integrity
4 measures, implementing integrity measures on the
5 apps.

6 Q. What do you mean by "implementing
7 integrity measures"?

8 A. A measure could look like identifying
9 users who have repeatedly violated Meta's terms of
10 service across apps.

11 Q. So if a user repeatedly violates Meta's
12 terms of service, Meta will use soft matching
13 techniques to identify the user's other accounts, is
14 that right?

15 MR. CHAPUT: Object to form.

16 Characterization.

17 THE WITNESS: That's my understanding.

18 BY MR. OLSZEWSKI-JUBELIRER:

19 Q. Which -- sorry, just take it one step
20 further.

21 And then Meta -- what does Meta do with
22 those users' other accounts it identifies via soft
23 matching?

24 MR. CHAPUT: Objection. Scope.

25 (Witness reviewing document.)

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1 THE WITNESS: I don't have the precise
2 list of enforcements that soft matching is
3 used for. I just have that it is used for
4 integrity use cases overall.

5 BY MR. OLSZEWSKI-JUBELIRER:

6 Q. Meta enforces the same policy against
7 the users' other accounts they identify via soft
8 matching, right?

9 MR. CHAPUT: Object to form. Scope.

10 THE WITNESS: Yes.

11 BY MR. OLSZEWSKI-JUBELIRER:

12 Q. And what violations of Meta's policies
13 does Meta use soft matching to enforce on users'
14 multiple accounts?

15 MR. CHAPUT: Object to form. Scope.

16 THE WITNESS: I don't have that detail.
17 I would have to follow up on that.

18 BY MR. OLSZEWSKI-JUBELIRER:

19 Q. Who would you ask?

20 A. I would -- I would find someone from
21 the integrity team. I would -- a specific name is
22 not coming to me right now, but I can get -- I mean,
23 like, we could start with [REDACTED] who I spoke to who
24 is in integrity data science. She could guide us to
25 the right person.

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1 Q. But Meta does use soft match to
2 identify multiple accounts and enforce its policies
3 on those soft matching accounts, right?

4 A. Yes.

5 MR. CHAPUT: Object to form.

6 BY MR. OLSZEWSKI-JUBELIRER:

7 Q. For some types of violations, right?

8 A. Yes, that's right.

9 Q. And you don't know which types of
10 violations?

11 MR. CHAPUT: Objection. Scope.

12 THE WITNESS: Yes, I can't give you the
13 complete list. But that's me, not Meta
14 knowing, yeah.

15 BY MR. OLSZEWSKI-JUBELIRER:

16 Q. For how long has Meta used soft match
17 to enforce violations of Meta's policies in its
18 accounts?

19 MR. CHAPUT: Objection. Scope.

20 THE WITNESS: I don't know the first
21 instance. At least since prior to 2018.

22 BY MR. OLSZEWSKI-JUBELIRER:

23 Q. Since prior to 2018?

24 A. Yeah.

25 Q. Is that in your notes?

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1 A. No. I think that's a misreading of my
2 notes. Sorry.

3 What I -- soft matching started to be
4 used for reporting in 2018, for financial reporting.
5 Yeah, I don't have the start date of when it started
6 to be used for integrity.

7 Q. Has Meta used soft matching to enforce
8 on multiple accounts used by underage users?

9 MR. CHAPUT: Objection. Vague.

10 THE WITNESS: Can you clarify the
11 question?

12 BY MR. OLSZEWSKI-JUBELIRER:

13 Q. When a user is reported for being
14 underage and their account is checkpointed, has Meta
15 used soft matching to identify that user's other
16 accounts and enforce its policies on those accounts?

17 A. No.

18 MR. CHAPUT: Object to the form.

19 THE WITNESS: No.

20 BY MR. OLSZEWSKI-JUBELIRER:

21 Q. Just to clarify, since 2012 through
22 April 1st, 2024, Meta has not used soft matching to
23 identify multiple accounts owned by underage users,
24 right?

25 MR. CHAPUT: Object to the form.

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1 THE WITNESS: That's right.

2 BY MR. OLSZEWSKI-JUBELIRER:

3 Q. Okay. And in the period following
4 April 1st, 2024, since you spoke to some of these
5 people more recently, same question, Meta has not
6 used soft matching to enforcing its multiple
7 accounts owned by underage users, right?

8 MR. CHAPUT: Objection. Form, scope.

9 THE WITNESS: That's right.

10 BY MR. OLSZEWSKI-JUBELIRER:

11 Q. But it has used soft matching in that
12 period to identify multiple accounts owned by people
13 who violate other of Meta's policies, right?

14 MR. CHAPUT: Object to the
15 characterization.

16 THE WITNESS: Yes.

17 BY MR. OLSZEWSKI-JUBELIRER:

18 Q. And Meta uses that soft matching
19 information to enforce on those users' other
20 accounts, right?

21 MR. CHAPUT: Object to the
22 characterization.

23 THE WITNESS: Yes.

24 BY MR. OLSZEWSKI-JUBELIRER:

25 Q. When Meta uses soft matching to enforce

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CONTINUED VIDEOTAPED DEPOSITION OF
ALLISON L. HARTNETT

Held At: Covington & Burling LLP
Salesforce Tower
4415 Mission Street
San Francisco, California

June 17th, 2025
10:03 a.m.

Reported By:
MAUREEN O. POLLARD, CSR #14449, RDR

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1 when there is -- the consequences are
2 higher, by which she's saying something
3 like an account disable is a high
4 consequence. So that's how I read what
5 she's saying.

6 BY MR. OLSZEWSKI-JUBELIRER:

7 Q. Okay. And you're here testifying for
8 Meta?

9 A. Yes.

10 Q. And that's Meta's understanding?

11 A. That is my understanding, yes.

12 Q. And Meta uses -- going back to the
13 integrity SUMA tables that we talked about, Meta
14 uses these tables to in some cases disable multiple
15 accounts that belong to the same person for
16 violating various of Meta's policies, right?

17 A. Yes.

18 MR. CHAPUT: Object to the form.

19 BY MR. OLSZEWSKI-JUBELIRER:

20 Q. And examples include policies about
21 child safety, fraud, scams, or terrorism, right?

22 A. Yes.

23 Q. But Meta does not use these tables for
24 enforcing, for disabling -- Meta, strike that.

25 Meta does not use these tables for

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1 disabling and removing multiple accounts that belong
2 to children under 13, right?

3 MR. CHAPUT: Object to the form.

4 THE WITNESS: Meta does not use those
5 tables for that purpose.

6 BY MR. OLSZEWSKI-JUBELIRER:

7 Q. Meta does not use any other tables to
8 find multiple accounts that are soft matched to
9 users that it has identified as likely under 13,
10 right?

11 MR. CHAPUT: Object to the form.

12 THE WITNESS: Meta only uses
13 hard-linked data.

14 BY MR. OLSZEWSKI-JUBELIRER:

15 Q. So the answer is yes?

16 A. Yes.

17 Q. Let's talk about deletion, please. So
18 under Notes it says -- starts on the bottom of
19 page 13 and goes to page 14. You're there? Okay.

20 So we talked yesterday about when Meta
21 determines an account is likely under 13 Meta
22 checkpoints that account, right?

23 A. Yep.

24 Q. And there are three states according to
25 your notes. There's a checkpoint state, there's a

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1 because it's not an effective method for
2 reporting.

3 So, yeah, that's all the data that I
4 have. I don't -- apologies if I'm
5 forgetting somewhere else that there is in
6 the notes, but that's what I'm aware.

7 BY MR. OLSZEWSKI-JUBELIRER:

8 Q. So you as Meta's witness, as Meta's
9 corporate designee for this topic, do not know if it
10 increases the number of under 13 users that were
11 identified on the platform?

12 MR. CHAPUT: Object to form.
13 Characterization.

14 THE WITNESS: I do not know.

15 BY MR. OLSZEWSKI-JUBELIRER:

16 Q. Let's talk about deletion timelines.

17 A. Okay.

18 Q. Your lawyer asked you about a special
19 45-day deletion timeline for under 13 reports,
20 right?

21 MR. CHAPUT: Object to the form.

22 THE WITNESS: My lawyer asked me
23 about -- I don't think he used the word
24 "special" -- about the deletion timeline
25 for u13.

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1 BY MR. OLSZEWSKI-JUBELIRER:

2 Q. Okay. And your testimony was that at
3 some point Meta created a particular deletion
4 timeline for accounts identified as being under 13,
5 and the date was in your notes. This is page 14.

6 A. Page 14.

7 Yes. In April 2024 the deletion
8 timeline for US u13 data was moved to 45 days.

9 Q. And that's not actually the deletion
10 timeline, that's the time period that --

11 A. Sorry, the disable timeline, the
12 disable timeline. The deletion timeline remains
13 90 days.

14 Q. Right.

15 So there's a disable period of 45 days,
16 and after 45 days expires the account is scheduled
17 for deletion, which takes place over the next
18 90 days, right?

19 A. That's correct.

20 Q. And prior to April 2024, accounts that
21 were identified as belonging to under 13 users and
22 placed in a disabled state remained in that disabled
23 state for the periods that we discussed before,
24 right?

25 MR. CHAPUT: Object to the form.

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1 THE WITNESS: Yes, that's accurate.

2 BY MR. OLSZEWSKI-JUBELIRER:

3 Q. Okay. So in April 2023, from that time
4 until April 2024, accounts that were identified as
5 belonging to children under 13 remained in that
6 disabled state for one year before they were
7 scheduled for deletion, right?

8 MR. CHAPUT: Object to the form.

9 THE WITNESS: The accounts that were
10 checkpointed and then did not appeal would
11 have been in that disabled state for one
12 year from April 2023, yes.

13 BY MR. OLSZEWSKI-JUBELIRER:

14 Q. Okay. And from 2022 to 2023, that time
15 period in which Meta retained that data of children
16 who were identified as likely under 13 checkpointed
17 and did not successfully appeal was six months,
18 right?

19 MR. CHAPUT: Object to the form.

20 THE WITNESS: The disabled accounts
21 were in the -- yeah, they were disabled --
22 in the disabled state for six months, yeah.

23 BY MR. OLSZEWSKI-JUBELIRER:

24 Q. Okay. So that's all the questions that
25 we have for you today. I want to thank you very