

EXHIBIT 82

CONFIDENTIAL

Page 1

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

---000---

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

_____/

THIS DOCUMENT RELATES TO:
PEOPLE OF THE STATE OF
CALIFORNIA, et al.,

Plaintiffs,

v. CASE No. 4:22-MD-03047
YGR (PHK)
META PLATFORMS, INC., et al., MDL No. 3047
Defendants.
_____/

CONFIDENTIAL PURSUANT TO THE PROTECTIVE ORDER

30(b)(6) VIDEOTAPED DEPOSITION OF AMOS HARTSTON, ESQ.
SAN FRANCISCO, CALIFORNIA
THURSDAY, AUGUST 7, 2025

STENOGRAPHICALLY REPORTED BY:
ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~ CSR
LICENSE NO. 9830
JOB NO. 7506014

CONFIDENTIAL

Page 299

1 health official, that you know is a public health
2 official, who has concluded that social media
3 represents an urgent public health crisis?

4 MR. RUDDY: Objection; form.

5 THE WITNESS: So in my review of legislation
6 and policies, and to prepare for Topics 14 and 16, I
7 did review a number of bills related to social media
8 use and concerns, and they did have statements in
9 support by various entities and people.

10 But I -- besides what's reflected in my
11 notes, I do not have an independent recollection of
12 specific public health officials --

13 MR. SCHMIDT: Okay.

14 THE WITNESS: -- employed by State of
15 California.

16 MR. SCHMIDT: Q. You're aware -- you invoked
17 the American Academy of Pediatrics.

18 Are you aware that -- do you know what the
19 DSM is?

20 MR. RUDDY: Objection; scope.

21 MR. SCHMIDT: Q. The Diagnostic and
22 Statistical Manual?

23 A Generally.

24 Q Are you aware that it is a recognized source
25 of -- that's used for diagnosing mental health

CONFIDENTIAL

Page 300

1 conditions?

2 A Generally, yes.

3 Q Are you aware that social media is not a
4 recognized diagnosis in the DSM?

5 MR. RUDDY: Objection; scope.

6 THE WITNESS: Sorry. The question was if
7 social media is a diagnosis?

8 MR. SCHMIDT: Social media addiction, what
9 you just referred us to a few minutes ago.

10 Q Are you aware that social media addiction is
11 not a recognized diagnosis in the DSM?

12 MR. RUDDY: Objection; scope.

13 THE WITNESS: I do not know one way or the
14 other.

15 MR. SCHMIDT: Q. Are you aware of any
16 medical, psychiatric, or psychological group that has
17 identified social media addiction as a diagnosable
18 condition?

19 MR. RUDDY: Objection; scope; attorney work
20 product; calls for expert testimony.

21 THE WITNESS: I do not know.

22 MR. SCHMIDT: Q. Let's go back to
23 Exhibit 28.

24 Do you see at the bottom of the page we've
25 been looking at, page '801, do you see there's a

CONFIDENTIAL

Page 301

1 marker for footnotes 3 to 5 towards the end?

2 A Sorry. I do not. I see 6 through 12.

3 Q It's the sentence before that.

4 A Yes.

5 Q Right after that, it reads:

6 (As read):

7 "High doses of adversity occurring early in
8 life without adequate buffering protections of trusted
9 caregivers in safe stable environments may lead to
10 prolonged activation of a biological stress response
11 and changes in brain structure and function."

12 Did I read that correctly?

13 A Yes.

14 Q Do you accept that as a true statement?

15 MR. RUDDY: Objection; scope.

16 THE WITNESS: So it's a partial statement.

17 The sentence continues, but yes.

18 MR. SCHMIDT: Q. Let's look at '857.

19 It says:

20 (As read):

21 "Adverse childhood experiences such as child
22 abuse, neglect, and household challenges like family
23 member incarceration or intimate partner violence, are
24 very common, affecting 62 percent of California adults
25 by age 18 years. Approximately 16 percent of

CONFIDENTIAL

Page 325

1 A Among others, yes.

2 Q What California public health agency has
3 specifically determined that social media causes
4 specific mental health problems?

5 MR. RUDDY: Objection; form.

6 THE WITNESS: So I referred to this before in
7 terms of depression, anxiety, self-harm, suicide risk.
8 But I think a lot of those documents you said weren't
9 officially by State of California. They were by
10 scientists or other health professionals. I do not
11 know specifically.

12 There were a number of studies identified in
13 support of legislation, but I do not specifically know
14 the credentials of the authors of those reports.

15 MR. SCHMIDT: I'm not asking about any
16 credentials.

17 Q I'm asking you: Can you point me to a
18 California public health agency that has made a
19 specific conclusion that social media causes specific
20 mental health problems?

21 MR. RUDDY: Objection; scope.

22 THE WITNESS: I've already testified about
23 the Never a Bother and suicide prevention that talks
24 about healthy use of social media. Again, I believe
25 the concern is unhealthy use would be a cause, in my

CONFIDENTIAL

Page 326

1 understanding, of suicide risk. But other than that,
2 I can't recall any.

3 MR. SCHMIDT: Q. Where did Never a Bother
4 say that unhealthy use of social media was a cause of
5 suicide?

6 It never said that; had they?

7 A So my review of the suicide prevention
8 documents, which included Never a Bother, and there
9 may have been other youth suicide prevention
10 initiatives, do include promotion of healthy use of
11 social media as a way to address risks of suicide. I
12 do not recall any specific language about causing
13 suicide.

14 Q Okay. Are you aware of any California public
15 health agency that has specifically said that social
16 media causes a specific mental health harm?

17 MR. RUDDY: Objection; form.

18 THE WITNESS: Not that I recall using that
19 specific language.

20 MR. SCHMIDT: Q. Are you aware of any
21 California public health agency or entity that has
22 concluded that there is a recognized mental health
23 condition of social media addiction?

24 MR. RUDDY: Objection; scope; form.

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

CONFIDENTIAL

Page 327

1 MR. SCHMIDT: Q. Let's turn to page --
2 actually, let's stay on page 57.

3 A Are we on Exhibit 31?

4 Q Yeah.

5 Do you see that they list major protective
6 factors for suicide?

7 A So sorry. What page are you on?

8 Q I'm still on page '1029, please.

9 A Okay. What was your question?

10 Q Do you see where they list major protective
11 factors for suicide?

12 A Yes.

13 Q Those are things that help protect against
14 suicide; correct?

15 A Reduce risk, yes.

16 Q One is effective mental health care; right?

17 A Yes.

18 Q One is connectedness to people, family,
19 community, and social institutions; right?

20 A Yes.

21 Q And you recognize that people can have
22 connectedness to people, family, community, and social
23 intuitions through social media; right?

24 MR. RUDDY: Objection; scope.

25 THE WITNESS: Yes.

CONFIDENTIAL

Page 388

CERTIFICATE OF REPORTER

I, ANDREA M. IGNACIO, hereby certify that the witness in the foregoing deposition was by me remotely sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision;

That before completion of the deposition, review of the transcript [x] was [] was not requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

D:



ANDREA M. IGNACIO, RPR, CRR, CCRR, CLR, CSR No. 9830