

EXHIBIT 83

CONFIDENTIAL

Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

: MDL No. 3047
IN RE: SOCIAL MEDIA : Case No.
ADOLESCENT ADDICTION/ : 4:22-MD-03047-YGR
PERSONAL INJURY PRODUCTS :
LIABILITY LITIGATION, :

:
: This Document Relates to: :
:
ALL ACTIONS :
:
:

Thursday, September 25, 2025

Video deposition of MARK WOLFE,
taken at the Offices of Pennsylvania Office of
Attorney General, Strawberry Square, 15th Floor,
Harrisburg, Pennsylvania, beginning at 9:12
a.m., EST, before Ryan K. Black, Registered
Professional Reporter, Certified Livenote
Reporter and Notary Public in and for the
Commonwealth of Pennsylvania.

CONFIDENTIAL

Page 59

1 BY MR. AUTEN:

2 Q. Is there a private determination you're
3 aware of?

4 A. I don't know.

5 Q. Okay. You're aware that this lawsuit
6 alleges that certain features of Instagram and
7 Facebook are harmful.

8 A. Yes.

9 Q. I don't mean this to be -- this is not
10 a memory test --

11 A. Mm-hmm.

12 Q. -- but you do know that its features
13 like algorithms, infinite scroll, like buttons,
14 notifications, right?

15 A. Yes.

16 Q. Has any -- that you're aware of, has
17 any Pennsylvania agency with responsibility for
18 youth mental health made a determination that
19 any specific feature or group of features on
20 Facebook or Instagram are harmful to youth
21 mental health?

22 MS. AMBROSE: Objection, form and
23 scope.

24 THE WITNESS: No, I'm not aware of
25 those determinations.

CONFIDENTIAL

Page 60

1 BY MR. AUTEN:

2 Q. And I don't think I asked you this,
3 but make sure I have it, are you aware of any
4 Pennsylvania agency with responsibility for
5 youth mental health making a determination
6 that Facebook or Instagram are addictive?

7 MS. AMBROSE: Same objection.

8 THE WITNESS: No.

9 BY MR. AUTEN:

10 Q. Okay. You're familiar with the Federal
11 Trade Commission?

12 A. Yes, I am.

13 Q. Did Pennsylvania make any requests to
14 the Federal Trade Commission in connection with
15 its investigation?

16 A. Yes. That is a -- an item --

17 Q. I think I can help you out.

18 MR. AUTEN: Can I get the tab, please?

19 BY MR. AUTEN:

20 Q. We're gonna mark as Exhibit 6, I
21 believe, the document that you were probably
22 going to take us too.

23 A. It was.

24 Q. You can tell me if it's not.

25 A. Yes.

CONFIDENTIAL

Page 61

1 (Wolfe Exhibit No. 6, a Request for
2 Non-public Materials and Certification of Intent
3 to Maintain Confidentiality and to Restrict Use
4 to Law Enforcement Purposes, was introduced.)

5 BY MR. AUTEN:

6 Q. You recognize Exhibit 6.

7 A.I do.

8 Q. This is one of the documents that
9 the Office of Attorney General identified as
10 relevant to the noticed topics, correct?

11 A. Yes.

12 Q. And you see this is described at the
13 top, top right, as a "Request for Non-public
14 Materials and Certification of Intent to
15 Maintain Confidentiality and to Restrict Use
16 to Law Enforcement Purposes?"

17 A. Yes.

18 Q. And this is dated August 1st, 2023,
19 correct?

20 A. Correct.

21 Q. That's a couple of months, more or
22 less, before this lawsuit was filed, right?

23 A. Yes.

24 Q. And the request, if you look at it,
25 it's -- it requests materials concerning

CONFIDENTIAL

Page 290

C E R T I F I C A T E

I do hereby certify that I am a Notary Public in good standing, that the aforesaid testimony was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true and correct record of the testimony given by the witness; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.

WITNESS my hand and official seal this _____ day of _____, 2025



Notary Public