

EXHIBIT 76

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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 to say.

2 BY MR. OLSZEWSKI-JUBELIRER:

3 Q. And all else being equal, users who see
4 more relevant content are more likely to come back
5 for more, is that right?

6 MR. CHAPUT: Objection. Form, scope.

7 THE WITNESS: Is it fair to say users
8 who see more relevant content come back for
9 more? Again, I think it's like a very high
10 level statement, but I'm not speaking on,
11 like, any -- I'm not speaking on any
12 precise data on, like, increase in
13 personalization and retention, but just as
14 a general statement, yes, I think that's
15 fair to say.

16 BY MR. OLSZEWSKI-JUBELIRER:

17 Q. And if users come back for more
18 content, that also presents Meta with more
19 opportunities to show the user ads, is that right?

20 MR. CHAPUT: Objection. Form, scope.

21 THE WITNESS: That is correct.

22 BY MR. OLSZEWSKI-JUBELIRER:

23 Q. Okay. So we'll get into the
24 differences between -- you said the differences in
25 ways ads are targeted at various times based on the

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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 THE WITNESS: Meta did ask all users of
2 Instagram to follow the terms of service,
3 and the terms of service required that
4 users be over 13.

5 BY MR. OLSZEWSKI-JUBELIRER:

6 Q. How did users, new users, agree to the
7 terms of service?

8 MR. CHAPUT: Object to the form.
9 Scope.

10 THE WITNESS: Yes. I don't have the
11 precise notes on exactly what the flow
12 looked like, but my understanding is that
13 users agreed to the terms of service within
14 their signup for an account.

15 BY MR. OLSZEWSKI-JUBELIRER:

16 Q. Was there -- do you know what the text
17 was that was displayed to new users to ask for their
18 agreement to the terms of service in this period
19 before December 2019?

20 MR. CHAPUT: Object to form. Scope.

21 THE WITNESS: I do not have that.

22 BY MR. OLSZEWSKI-JUBELIRER:

23 Q. Were users required to read the terms
24 of service before they checked a box agreeing to the
25 terms of service?

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1 MR. CHAPUT: Object to form. Scope.

2 THE WITNESS: I don't know.

3 BY MR. OLSZEWSKI-JUBELIRER:

4 Q. Do you know how -- if users were even
5 displayed the terms of service in this period --

6 MR. CHAPUT: Object --

7 BY MR. OLSZEWSKI-JUBELIRER:

8 Q. -- before they agreed to them?

9 MR. CHAPUT: Object to form. Scope.

10 THE WITNESS: I don't know. I don't
11 know.

12 BY MR. OLSZEWSKI-JUBELIRER:

13 Q. There was a period of time in which
14 Meta started requiring existing users of Instagram
15 to enter their age, is that right?

16 A. That is right.

17 Q. And when did that happen?

18 A. Beginning in May 2022, Meta -- yes,
19 May 2022 Instagram users started to be asked to give
20 their age, if they were preexisting users.

21 Q. Okay. And when users give their age to
22 Meta on account signup, or in this flow when Meta
23 asked users to indicate their age, Meta calls that
24 the stated age?

25 A. Yes.

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1 from children under 13?

2 MR. CHAPUT: Object to the form. Calls
3 for a legal conclusion.

4 And, Allison, just make sure you give a
5 verbal answer. Thank you.

6 THE WITNESS: Sorry, I am not -- I do
7 not want to give a legal conclusion about
8 that.

9 Can you ask the question again?

10 BY MR. OLSZEWSKI-JUBELIRER:

11 Q. Is it your general understanding that
12 the law has to do with collecting and using personal
13 information from children under 13?

14 MR. CHAPUT: Object to the form.

15 THE WITNESS: Yes, that is my general
16 understanding.

17 BY MR. OLSZEWSKI-JUBELIRER:

18 Q. And the law, generally speaking, also
19 regulates collecting and using personal information
20 from users of websites or online services that are
21 directed to children under 13?

22 MR. CHAPUT: Object to the form.

23 THE WITNESS: That was my
24 understanding.

25 ///

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1 BY MR. OLSZEWSKI-JUBELIRER:

2 Q. Does Meta have written policies for
3 complying with COPPA for its Facebook and Instagram
4 platforms?

5 A. On Instagram and Facebook, in the terms
6 of service there is, You cannot use our products
7 under 13. That is our -- that's the only policies,
8 written policies that I'm aware of.

9 Q. From 2012 to the present, aside from
10 the restriction on users being under 13 on Facebook
11 and Instagram as stated in the terms of use and
12 terms of service, has Meta had any written policies
13 for complying with COPPA for Facebook and Instagram?

14 A. No.

15 Q. Are there accounts on Meta's platforms
16 that are directed to children under 13?

17 A. No.

18 Q. Is there content on Meta's platforms
19 that's directed to children under 13?

20 MR. CHAPUT: Objection. Scope.

21 THE WITNESS: No.

22 BY MR. OLSZEWSKI-JUBELIRER:

23 Q. So Meta doesn't have a written policy
24 that it will not collect personal information from
25 people who visit accounts on its platforms that are

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1 directed to children under 13?

2 MR. CHAPUT: Object to the form.

3 Scope.

4 THE WITNESS: Sorry, can you repeat the
5 question?

6 BY MR. OLSZEWSKI-JUBELIRER:

7 Q. Meta doesn't have a written policy that
8 it will not collect personal information from people
9 who use accounts on its platforms that are directed
10 to children under 13?

11 MR. CHAPUT: Same objections.

12 THE WITNESS: Meta doesn't have a
13 written policy that it will not collect
14 information from people who visit accounts
15 who are directed to under 13. There are
16 not accounts that are directed to under 13,
17 so I don't think that would be a relevant
18 policy.

19 BY MR. OLSZEWSKI-JUBELIRER:

20 Q. And Meta doesn't have a policy like
21 that?

22 MR. CHAPUT: Same objections.

23 THE WITNESS: No.

24 BY MR. OLSZEWSKI-JUBELIRER:

25 Q. Does Meta have a written -- Meta

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1 precise term. You might mean internal escalation,
2 is the --

3 Q. That's the term here that's used, yeah,
4 sure. Internal escalation, right?

5 A. Yep.

6 Q. And that is referring to Meta has human
7 reviewers who review accounts or content that are
8 reported for other reasons other than for belonging
9 to an underage user, right?

10 A. That's right.

11 Q. And in the process of that review if
12 they notice some strong indication that the account
13 belongs to a child under 13, they can escalate that
14 into the underage review?

15 MR. CHAPUT: Object to the form.

16 THE WITNESS: That is accurate.

17 BY MR. OLSZEWSKI-JUBELIRER:

18 Q. Okay. And that policy allowing
19 escalations, internal escalations, when did that
20 begin on Facebook and Instagram?

21 MR. CHAPUT: Object to the form.

22 (Witness reviewing document.)

23 BY MR. OLSZEWSKI-JUBELIRER:

24 Q. You're looking at your notes, right?

25 A. Yeah. Looking at my notes, I don't

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1 have the date that that policy or that process
2 began. Checking.

3 (Witness reviewing document.)

4 A. Yeah, I don't have that date.

5 Q. Okay. Another way that Meta detects
6 underage users is user self-reports, is that right?

7 A. User self-reports, yes.

8 Q. So that refers to when users edit their
9 date of birth, their stated age, right?

10 A. That's correct.

11 Q. And if they edit their date of birth to
12 stated age as under 13, Meta places those users'
13 accounts in an age checkpoint, right?

14 A. That's correct.

15 Q. The age checkpoint is where a user is
16 prohibited from accessing the account, right?

17 A. Yes. If you're in an age checkpoint,
18 you can't access your account.

19 Q. And Meta places users in an age
20 checkpoint when it determines that the user is under
21 13, right?

22 MR. CHAPUT: Object to the
23 characterization.

24 THE WITNESS: No. That's not accurate.
25 Meta places users in an age checkpoint when

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1 a human reviewer has reviewed the account
2 after there's -- you know, the account has
3 come in for human review from the sources
4 you described, and then a human reviewer
5 reviews the account and determines if
6 there -- either if they -- if they think
7 the account may be under 13, and we
8 instruct the human reviewers to err on the
9 side of if you were uncertain, mark it as
10 possible. And so the user is then
11 checkpointed, so there's uncertainty in the
12 checkpoint.

13 Then the user has the opportunity to
14 appeal the checkpoint with -- by providing
15 ID, by certifying, yeah, identifying
16 themselves.

17 BY MR. OLSZEWSKI-JUBELIRER:

18 Q. You just testified that when users
19 self-report that they're under 13, Meta checkpoints
20 those accounts, right?

21 A. That's right.

22 Q. And that process does not involve human
23 review, right?

24 A. That's -- it is reviewed after -- the
25 appeal involves human review, yeah.

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1 Q. Okay. But there's no human review
2 between a user stating their age as under 13 and
3 being sent to the checkpoint, right?

4 A. That's right.

5 Q. Okay. You talked about appeals, right?

6 A. (Nodding in the affirmative.)

7 Q. So after a user is placed in the
8 checkpoint, the user can appeal Meta's decision to
9 place them in the checkpoint?

10 A. That's accurate.

11 Q. And the decision to place them in the
12 checkpoint is based on Meta's determination that
13 they're likely under 13, right?

14 MR. CHAPUT: Object to the
15 characterization.

16 THE WITNESS: Yeah, it is not precisely
17 that they're likely under 13, it is if they
18 could be under 13 or if you have doubt.
19 That's the instructions for the reviewer,
20 is you err on the side of your doubt -- err
21 on the side of young if you're unsure.

22 BY MR. OLSZEWSKI-JUBELIRER:

23 Q. Okay. Just based on talking about the
24 review proc- -- appeal process, the appeal process
25 involves users being able to submit their ID to Meta

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1 to verify that they are over 13, right?

2 A. That's correct.

3 Q. Okay. And there's a time limit on how
4 long the user has to submit their ID?

5 A. Yes. The user has 30 days. If they
6 don't, then the appeal is considered failed and the
7 account is deleted.

8 Q. Okay. The account -- we'll talk about
9 it later, but there's some time period after the
10 30 days when Meta schedules the account for
11 deletion, right?

12 A. That's right.

13 Q. It's not immediately deleted after
14 30 days?

15 A. Yes. Deletion is -- when I'm using the
16 term "deleted," it is a process. Deletion is a
17 process, yeah.

18 Q. Okay. But the deletion process -- we
19 can talk about that later.

20 Okay. When a user changes their age
21 from under 18 to over 18, Meta requires them to
22 verify their age, right?

23 A. That's right.

24 MR. CHAPUT: Sorry, just object to the
25 form. I'm not sure if there's an issue

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1 with how the court reporter has transcribed
2 it.

3 Counsel, would you mind just reasking
4 the question?

5 BY MR. OLSZEWSKI-JUBELIRER:

6 Q. If a user on Meta's platform changes
7 their age from under 18 to over 18, Meta requires
8 those users to verify their age, right?

9 A. Under 18 to over 18, yes, that requires
10 a verification.

11 Q. And Meta presents different options to
12 those users of how they can verify their age, right?

13 A. Yes, that's right.

14 Q. One of those options is submitting a
15 video selfie to a company called Yoti?

16 A. Yeah. Just a slight nuance. The user
17 submits a video selfie to Meta and Meta shares it
18 with Yoti.

19 Q. Okay. And Yoti is a company that has a
20 model that estimates the age of users, right?

21 A. That's correct.

22 Q. It analyzes those video selfie and
23 estimates their age, right?

24 A. Yes, that is right.

25 Q. And in that process when Yoti estimates

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1 they were to roll out the IG SURF reporting flow to
2 100 percent of users, right?

3 MR. CHAPUT: Objection. Scope.

4 (Witness reviewing document.)

5 BY MR. OLSZEWSKI-JUBELIRER:

6 Q. Can I point to a sentence in the first
7 e-mail?

8 A. Yeah go ahead.

9 Q. You've read the whole e-mail, right?

10 A. Yes.

11 Q. Okay. So in the first e-mail there's a
12 sentence that reads, "It will cost us roughly an \$1
13 per underage user we find on the app if we roll out
14 SURF widely in future quarters," right?

15 A. That's what it says.

16 Q. Okay. So that's an estimate that Meta
17 would have to spend an additional \$1 for every child
18 under 13 it identified on the app if it rolled out
19 the improved underage reporting flow widely to
20 Instagram users, right?

21 MR. CHAPUT: Object to form. Scope.

22 THE WITNESS: I think what that's
23 saying is a total of \$1 instead of
24 additional. But otherwise, yes.

25 ///

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1 BY MR. OLSZEWSKI-JUBELIRER:

2 Q. Okay. So it would cost a dollar per
3 child -- Meta would have to spend a dollar per child
4 to identify them if it rolled out this improved
5 underage reporting form on Instagram, right?

6 MR. CHAPUT: Object to form. Scope.

7 THE WITNESS: Yeah, I wouldn't
8 characterize it as a dollar per child.
9 It's a dollar per checkpointed account.
10 That's what that is saying.

11 BY MR. OLSZEWSKI-JUBELIRER:

12 Q. Okay. A dollar per underage user,
13 right?

14 MR. CHAPUT: Object to the form.
15 Characterization, scope.

16 THE WITNESS: Again, no, a checkpointed
17 account doesn't -- it is not equivalent to
18 an underage user. There is only a certain
19 percentage of checkpointed accounts that
20 end up being disabled.

21 Even when they are disabled, we don't
22 know that they're underage users. We just
23 know they did not appeal or did not appeal
24 successfully.

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1 BY MR. OLSZEWSKI-JUBELIRER:

2 Q. Okay. Do you know -- how do you know
3 that it's not referring to additional underage users
4 who are -- ultimately are removed from the platform?

5 MR. CHAPUT: Object to the form.

6 Scope.

7 THE WITNESS: I don't precisely know
8 because I haven't seen the exact
9 spreadsheet of what this is referring to,
10 but it is -- my read of this e-mail chain,
11 what I am thinking is that this refers to
12 checkpoint, but I'm not sure.

13 BY MR. OLSZEWSKI-JUBELIRER:

14 Q. Okay. Because you've never seen this
15 document before, right?

16 A. I have not seen this document before.

17 MR. CHAPUT: Object to the form.

18 BY MR. OLSZEWSKI-JUBELIRER:

19 Q. Okay. And the next sentence reads,
20 "The question at hand is the tradeoff of removed u13
21 versus ops capacity & cost," right?

22 A. That is the next sentence.

23 Q. Okay. And the tradeoff Meta was
24 considering about whether to roll out this underage
25 reporting flow was additional removed u13 users

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1 MR. CHAPUT: Object to the form.

2 Scope.

3 THE WITNESS: I'm just going to need a
4 couple minutes to look at this to answer
5 that.

6 (Witness reviewing document.)

7 THE WITNESS: Yeah, I think this could
8 either be a training or it could be just
9 describing the process.

10 BY MR. OLSZEWSKI-JUBELIRER:

11 Q. A description of the training perhaps?

12 A. Potentially.

13 Q. Okay. Can you turn to the page ending
14 in 68738?

15 A. Yes.

16 Q. The title is Decision Tree?

17 A. Yes.

18 Q. This is a decision tree that human
19 reviewers were to use in reviewing underage reports?

20 MR. CHAPUT: Object to form. Scope.

21 THE WITNESS: It looks like it.

22 BY MR. OLSZEWSKI-JUBELIRER:

23 Q. Okay. And the first thing says, "Look
24 at the photos on the" file, right?

25 A. It looks like it's cut off. It says,

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1 "Look at the photos on the."

2 Q. "photos on the" -- sorry, "Look at the
3 photos on the."

4 A. Yes.

5 Q. Do you see that?

6 A. That's what it says, yes.

7 Q. Okay. So looking at photos is the
8 step, is that fair to say?

9 A. I think so.

10 Q. Okay. And then -- okay.

11 Do you see the -- so the first box is
12 referring to that step about checking for child
13 sexual abuse material, right?

14 A. I believe so. I'm not familiar with
15 this acronym, CEI, but I believe that it's likely.

16 Q. And if the answer is no, then you move
17 on past that to the next diamond, is that right?

18 A. Yes.

19 Q. Okay. And then the question is, "Are
20 there 1 or 0 photos on the account?" Right?

21 A. Yes.

22 Q. So if Meta reviewed a report of an
23 underage account and there was only one photo on the
24 account, the reviewer is instructed to ignore the
25 report, right?

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1 A. Yes.

2 Q. Okay. The next box says if an account
3 is reported for being underage, and Meta's
4 instructed its human reviewers to ignore the report
5 if there were no people in photos on the account,
6 right?

7 A. Yes.

8 Q. Okay. And the next box asks, "Are
9 there at least 3 photos of the same clearly of age
10 person?" Right?

11 A. That's what it says.

12 Q. Okay. And if the answer is yes, then
13 the human reviewers were instructed to ignore the
14 report, right?

15 A. Yes.

16 Q. So if there are at least three photos,
17 no matter how many photos are on the account, Meta
18 instructed its -- at least -- strike that.

19 Meta instructed its reviewers when
20 reviewing underage reports that if there are at
21 least three photos of the same person who is clearly
22 over the age of 13 on the account, they should
23 ignore the report, right?

24 A. I think that's what that's saying.

25 Q. Okay. And then -- so let's just say if

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1 there are 20 photos on the account and 17 of them
2 are someone the reviewer recognized to be a 10 year
3 old but three of them are of someone who is 16 years
4 old, Meta instructed the reviewer to ignore the
5 report, right?

6 MR. CHAPUT: Object to form. Scope.

7 THE WITNESS: I'm just reading the
8 small text here. Can you go -- well...

9 (Witness reviewing document.)

10 THE WITNESS: Yeah, I mean, that's
11 actually not an accurate, because what it's
12 saying here is if there were 17 -- if there
13 were a couple of photos of someone who is
14 borderline age like 16, then, no, it
15 wouldn't have been ignored.

16 BY MR. OLSZEWSKI-JUBELIRER:

17 Q. Do you see the box on the left that
18 says, "Clearly of age"?

19 A. Yes. It says, "Clearly of age is
20 someone who does not look borderline, so above the
21 age of 16."

22 Q. Okay. So let me ask the question
23 again, but we can change the age to 17.

24 If there are 20 photos on the account
25 and 17 of them are someone the reviewer recognized

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1 MR. CHAPUT: Object to the form.

2 THE WITNESS: I don't know, but that's
3 typically how that term would be used.

4 BY MR. OLSZEWSKI-JUBELIRER:

5 Q. Okay. "Product will likely push back
6 on this by pointing out that the consequences of
7 showing the wrong ad to someone is relatively low
8 compared with the consequence of being checkpointed
9 as an underage account."

10 That's what it says, right?

11 A. That's what it says.

12 Q. Then it says, "However, taking this
13 position will invite criticism that we are putting
14 profits over people."

15 A. That's what it says.

16 Q. And Meta ultimately decided not to use
17 inferred account links to enforce against multiple
18 accounts owned by children, right?

19 MR. CHAPUT: Object to the form.

20 THE WITNESS: So I don't know what --
21 if this meeting happened or what exactly
22 happened here, but I can just confirm that
23 Meta does not use the inferred accounts
24 links today.

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1 BY MR. OLSZEWSKI-JUBELIRER:

2 Q. And your testimony is that they have
3 never used inferred account links to enforce against
4 multiple underage accounts owned by the same child,
5 right?

6 A. Yes.

7 Q. Okay. If a user is deactivated for
8 being underage, does Meta take any steps to prevent
9 them from creating a new account?

10 MR. CHAPUT: Object to form. Scope.

11 THE WITNESS: Can you just ask the
12 question one more time just to make sure
13 I'm answering accurately?

14 BY MR. OLSZEWSKI-JUBELIRER:

15 Q. So when a user has their account
16 deactivated for being underage, does Meta take any
17 steps to prevent that person from creating a new
18 account on Meta's platforms?

19 MR. CHAPUT: Object to form and scope.
20 (Witness reviewing document.)

21 THE WITNESS: I don't -- I don't think
22 so. I'm just making sure I'm not missing
23 something.

24 We do in the -- like if a user
25 indicates that they're under 13 in the age

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1 collection flow, then the user is blocked
2 from signing up. But if the user is
3 disabled, their account is deleted. But we
4 don't -- yeah, there's not an action beyond
5 that.

6 BY MR. OLSZEWSKI-JUBELIRER:

7 Q. So Meta takes no steps to prevent a
8 user who has previously been -- had their account
9 disabled for being underage from creating a new
10 account on Meta's platforms?

11 MR. CHAPUT: Object to form. Scope.
12 (Witness reviewing document.)

13 THE WITNESS: I'm just uncertain if we
14 use the contact points, like I would -- I'm
15 not sure. I think we should follow up on
16 this.

17 BY MR. OLSZEWSKI-JUBELIRER:

18 Q. And contact points you mean are like
19 the --

20 A. If someone could use the same e-mail
21 again. Yeah, I'm not sure. Otherwise, like, what
22 would we -- if someone changes all of their
23 information, we need a piece of information to link
24 an account that has been taken down to a new
25 account.

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1 So I want to check how we use a piece
2 of information that we have on new account creation.

3 Q. Okay. All right.

4 A. By "contact point," I mean e-mail or
5 phone number.

6 Q. Okay.

7 MR. OLSZEWSKI-JUBELIRER: Why don't we
8 take a ten-minute break.

9 THE VIDEOGRAPHER: The time is 4:17.
10 We're off the record.

11 (Whereupon, a recess was taken.)

12 THE VIDEOGRAPHER: The time is 4:33.
13 We're back on the record.

14 BY MR. OLSZEWSKI-JUBELIRER:

15 Q. So let's talk about inauthentic reports
16 of underage users.

17 A. Okay.

18 Q. You've talked about abuse as a
19 reporting form, right?

20 A. Yes.

21 Q. Has Meta's underage reporting form been
22 the subject of scripting attacks?

23 A. Yes.

24 Q. And aside from scripting attacks you
25 talked about, are there other ways that -- is Meta

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CERTIFICATE OF COURT REPORTER

I, MAUREEN O'CONNOR POLLARD, Registered
Diplomate Reporter, CSR No. 14449 for the State of
California, the officer before whom the foregoing
deposition was taken, do hereby certify that the
foregoing transcript is a true and correct record of
the testimony given; that said testimony was taken
by me stenographically and thereafter reduced to
typewriting under my direction; and that I am
neither counsel for, related to, nor employed by any
of the parties to this case and have no interest,
financial or otherwise, in its outcome.

Dated this 17th day of June, 2025.

Maureen O. Pollard

MAUREEN O'CONNOR POLLARD
CSR No. 14449