

EXHIBIT 2

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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

This document Relates to:

ALL ACTIONS

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VIDEOTAPED DEPOSITION OF BRADLEY ZICHERMAN, MD
PALO ALTO, CALIFORNIA
AUGUST 27, 2025
9:16 A.M.

Job No. MDLG7553548
Stenographically reported by:
JENNY L. GRIFFIN, RMR, CSR, CRR, CCRR, CRC
CSR No. 3969

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1 colleagues or even John Ellis in psychiatry or
2 addiction psychiatry trainees that I work with.

3 Q. I'll try one more time.

4 Are you willing to name any other
5 clinicians who work in this space who share your
6 views on social media addiction?

7 A. You know, you're welcome to go through the
8 roster of child and adolescent psychiatrists at
9 Stanford and ask them that question. I would not
10 want to speak or share the opinion of other
11 individuals specifically without asking them.

12 Q. Well, you just did that, Dr. Zicherman; so
13 you've dug -- backed yourself into a bit of a
14 corner.

15 If you're not willing to share the names,
16 that's fine. Just say that we'll move on. Is
17 that --

18 A. Okay. Well, then I would say I'm not
19 willing to share the names of individuals.

20 Q. Okay. Have you developed any opinions on
21 the prevalence of purported social media addiction
22 among US teenagers?

23 A. Have I developed opinions on the prevalence
24 of social media use disorders?

25 Q. Well, hold on. Let me just stop you, then.

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1 You -- I said "social media addiction,"
2 which is the phrase that appears throughout your
3 report.

4 A. Okay.

5 Q. Do you prefer the term "social media use
6 disorder"?

7 A. No, we can use "addictions."

8 Q. Well, I'm just using it because you use it.
9 So I'm -- do you use "social media addiction" in
10 your clinical practice?

11 A. I use that term in practice.

12 Q. So if you do eventually produce your
13 clinical notes in this litigation, you would expect
14 for me to see "social media addiction" written all
15 over your clinical notes; is that right?

16 MS. O'NEILL: Objection. Form.

17 THE WITNESS: I don't believe it's
18 appropriate for me to answer questions about my
19 notes.

20 BY MS. BARNHART:

21 Q. On what basis, Dr. Zicherman?

22 A. Well, I believe I say that that was not
23 what I relied on to form my opinion earlier.

24 Q. That's news to me.

25 So you did not -- let me ask that question

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1 again because I don't think we got a clear answer.

2 You did not consider or rely on any of your
3 clinical notes or clinical templates in forming your
4 opinions in this case; is that accurate?

5 A. I have to review notes every day that I'm
6 in the office. That's what it is to work with
7 patients. Specific notes and encounters were not
8 used to develop my opinion in the matter.

9 Q. And when you review those notes every day
10 that you're in the office, do you see the phrase
11 "social media addiction" in those notes, or do you
12 see another phrase like "social media use disorder"
13 or "problematic social media use"?

14 A. Well, I think that terms can be
15 interchangeable, and I've seen it stated different
16 ways across records.

17 Q. So you use different terms across your
18 different records?

19 A. Sometimes I use different terms.

20 Q. Do you sometimes use "social media
21 addiction"?

22 A. I have referenced that term.

23 Q. How many times have you specifically
24 diagnosed someone with social media addiction
25 specifically, that disorder?

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1 A. Again, I think that goes into privileged
2 patient information. Again, I can estimate that --
3 you know, we've gone through this -- the percentage
4 of patients that I believe have concerning social
5 media use -- social media use concerns and the
6 percentage of patients presenting for those
7 evaluations that I end up utilizing a diagnosis for.

8 Q. So you're unwilling to answer my question
9 of how many times you have specifically diagnosed
10 someone with social media addiction?

11 MS. O'NEILL: Objection. Form.

12 THE WITNESS: Well, I'm mean, I'm happy to
13 provide estimates again which coincide with our
14 discussions earlier about percentage of patients
15 that present with concerning social media use for
16 that reason and percentage of patients that end up
17 with a potential diagnosis within my estimation in
18 the clinic.

19 BY MS. BARNHART:

20 Q. I'm just trying to understand why you're
21 resisting my question. Is it that you do not know
22 the number of times that you have specifically
23 diagnosed someone with social media addiction, or
24 are you just not willing to answer it for privacy
25 reasons?

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1 A. Well, I believe I have answered the
2 question to the best of my abilities based on
3 working with patients in this clinic for many, many
4 years.

5 Q. Well, then I need you to answer it again
6 because I didn't get an answer to my question.

7 What is the number of times that you have
8 diagnosed someone specifically with social media
9 addiction?

10 A. For patients presenting to the clinic with
11 social media use concern -- disorder concerns or
12 addiction concerns, the preponderance of those
13 patients end up with a diagnosis.

14 Q. So how many patients have you diagnosed
15 specifically with social media addiction?

16 A. So if we reference again the number of
17 patients presenting to the clinic for concerns for
18 technology use, which I reference 25 to 35 percent,
19 the majority of those will end up meeting what I
20 would state is criteria for a social media use
21 addiction or disorder.

22 Q. Can you or can you not give me a number in
23 response to my question how many patients have you
24 diagnosed specifically with social media addiction?

25 MS. O'NEILL: Objection. Asked and

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1 answered.

2 THE WITNESS: I believe I've answered that
3 question --

4 BY MS. BARNHART:

5 Q. Tell me again.

6 A. -- several times.

7 Q. I'm looking for a number. Okay? I'm not
8 looking for a speech; I'm looking for a number.

9 How many patients have you diagnosed
10 specifically with social media addiction?

11 MS. O'NEILL: Same objection.

12 THE WITNESS: We've discussed that there
13 are hundreds of patients that have come in over the
14 course of years. Roughly somewhere in that range
15 would be the number that I would say meet criteria
16 for a social media use addiction disorder.

17 BY MS. BARNHART:

18 Q. Nowhere in that answer did you give me a
19 number of patients that you have actually diagnosed
20 specifically with social media addiction.

21 A. I'm sorry. I believe I've answered the
22 question.

23 Q. What's the number, Dr. Zicherman?

24 MS. O'NEILL: Objection. Asked and
25 answered.

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1 THE WITNESS: Again, I believe it's in the
2 hundreds, going back to, you know, the genesis of
3 the clinic.

4 BY MS. BARNHART:

5 Q. That you've actually diagnosed with social
6 media addiction?

7 A. I think that's -- you know, if we do the
8 math, I think that's probably a fair estimate.

9 Q. I did the math, and I came up with 60. We
10 talked about this earlier.

11 A. 60 over the course of one year.

12 Q. No, over the course of five years,
13 Dr. Zicherman. That's what we talked about earlier.

14 A. Well --

15 Q. Let's do it this way.

16 A. Sure.

17 Q. You have not actually gone back through --
18 I just want to confirm.

19 You have not gone back through all of your
20 clinical notes in a systematic way to determine the
21 number of people that you've actually diagnosed with
22 social media addiction; correct?

23 A. I have not done that as far as report
24 process.

25 Q. Okay. So we got a little off topic. I'll

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1 circle back to where I think we were.

2 Have you developed any opinion on the
3 prevalence of purported social media addiction among
4 US teenagers?

5 MS. O'NEILL: Objection. Form.

6 THE WITNESS: I've developed opinions on
7 prevalence.

8 BY MS. BARNHART:

9 Q. What is your opinion -- in your opinion,
10 what is the prevalence of purported social media
11 addiction among US teenagers?

12 A. It's absolutely increasing across our
13 population; but to answer that question, you're
14 getting into population epidemiologic
15 considerations. And I'm not here to provide a
16 specific answer on the specific number, but I can
17 tell you it's absolutely increasing. And I'm seeing
18 that within the clinic as well.

19 Q. So you have no opinion on what is the
20 prevalence of purported social media addiction among
21 US teenagers?

22 MS. O'NEILL: Objection. Form.

23 THE WITNESS: I believe it's fair to say
24 that the prevalence is significant and concerning,
25 but ask a epidemiologist or someone who is an expert

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I, JENNY L. GRIFFIN, hereby certify:

That I am a certified shorthand reporter in and for the County of Alameda, State of California;

Prior to being examined, BRADLEY ZICHERMAN, MD, the witness named in the foregoing deposition, was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth; that said deposition was taken pursuant to notice at the time and place therein set forth, and was taken down by me in stenotype and thereafter transcribed by means of computer-aided transcription, and that said deposition is a true record of the testimony given by the witness.

I further certify that I am neither counsel for nor related in any way to any party to said action, nor otherwise interested in the outcome thereof.

In witness whereof, I have hereunto subscribed my name September 9, 2025.



JENNY L. GRIFFIN, CSR #3969
Certified Shorthand Reporter