

EXHIBIT 4

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1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA

3 IN RE: SOCIAL MEDIA ADOLESCENT :MDL NO.
4 ADDICTION/PERSONAL INJURY PRODUCTS :4:22-MD-
5 LIABILITY LITIGATION :3047-YGR

6 SUPERIOR COURT OF THE STATE OF CALIFORNIA
7 FOR THE COUNTY OF LOS ANGELES
8 SPRING STREET COURTHOUSE

9 COORDINATION PROCEEDING SPECIAL TITLE :
(RULE 3,400) :
10 SOCIAL MEDIA CASES :
11 :LEAD CASE
12 :NO. FOR
13 :FILING
14 :PURPOSES
15 :22STCV21355
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THIS DOCUMENT RELATES TO:
STATE OF TENNESSEE, ex rel, JONATHAN SKRMETTI, ATTORNEY GENERAL and REPORTER,
V.
META PLATFORMS, INC., and INSTAGRAM, LLC
CASE NO. 23-1364-IV

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

DEPOSITION UNDER VIDEO EXAMINATION OF
MARK ZUCKERBERG
March 27, 2025
VOLUME I

Videotaped deposition of MARK ZUCKERBERG taken pursuant to notice, was held at the law offices of Covington Burling, LLP, 3000 El Camino Real, Palo Alto, California, beginning at 10:12 a.m., Pacific, on the above date, before Michelle L. Ridgway, a Registered Professional Reporter, Certified Court Reporter (NJ-CCR # XI02126), Certified Realtime Reporter, Certified Shorthand Reporter (CA-CSR # 14592), and Notary Public.

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1 before Congress, did you disclose that several 12:40:25
2 product features of Instagram and Facebook could 12:40:27
3 lead to a loss of control over time spent? 12:40:29

4 MR. SCHMIDT: Objection. 12:40:31
5 Foundation. 12:40:32

6 THE WITNESS: Again, I mean, 12:40:32
7 I think you're referencing one specific 12:40:33
8 study that we talked about before that I 12:40:36
9 don't think really conveys what our view of 12:40:38
10 those issues were after studying them 12:40:43
11 holistically. And I'm not sure exactly 12:40:46
12 what came up at those hearings. 12:40:48

13 BY MR. WARREN: 12:40:50

14 Q. If you wanted to alert kids and 12:40:50
15 parents that they may experience problematic use of 12:40:52
16 Facebook and Instagram, you had the resources to do 12:40:55
17 that, yes? 12:40:58

18 A. I'm not sure what you mean by that, 12:40:59
19 but I think problematic use is one of the topics 12:41:02
20 that we study and talked about publicly, and I 12:41:05
21 think we probably published research on it. 12:41:07

22 So I think that we were and have 12:41:10
23 been engaged in both the kind of conveying what we 12:41:12
24 know and using that to inform our product roadmap 12:41:18
25 to build tools to help people solve their issues. 12:41:21

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1 Q. Now, in the clip that we watched, 12:41:25
2 in your testimony to Representative Johnson, you 12:41:29
3 were asked whether the product was addictive, and 12:41:33
4 you said, "No, I don't believe so." 12:41:36

5 Did you go on then to explain that 12:41:39
6 your researchers are actually aware of a phenomenon 12:41:43
7 called problematic use? 12:41:46

8 A. Well, in the video that you showed 12:41:49
9 me, I was cut off very quickly in my answer. 12:41:51

10 Q. Have you ever told Congress that 12:41:55
11 your researchers are aware of the phenomenon called 12:41:56
12 problematic use? 12:41:59

13 A. I'm not sure if that came up. But, 12:42:00
14 I mean, they asked me if I think that the products 12:42:02
15 are addictive, and I answered honestly. 12:42:04

16 Q. And you're aware that at least some 12:42:06
17 of your researchers have equated problematic use to 12:42:09
18 social media addiction, correct? 12:42:12

19 MR. SCHMIDT: Objection. 12:42:14

20 Foundation. 12:42:15

21 THE WITNESS: I think, I 12:42:16
22 mean, there are documents that you've shown 12:42:17
23 that have some researchers talking about 12:42:18
24 that. But that's not my understanding of 12:42:21
25 what the kind of overall view of the 12:42:24

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1 research shows, or even -- I wouldn't even 12:42:27
2 want to represent what those researchers 12:42:30
3 believe today. 12:42:32

4 I mean, these are documents 12:42:33
5 that were all written in the past, and 12:42:34
6 there's been more scientific study on all 12:42:35
7 of these topics. 12:42:37

8 So it's -- it's very 12:42:38
9 difficult for me to characterize things 12:42:39
10 other people wrote without looking at, 12:42:41
11 like, the entirety of the study that has 12:42:43
12 been done. 12:42:47

13 BY MR. WARREN: 12:42:47

14 Q. Well, you did characterize the 12:42:48
15 company's position on this issue when you testified 12:42:50
16 that you didn't believe the products are addictive, 12:42:52
17 right? 12:42:56

18 A. Yes. That is my belief. 12:42:56

19 Q. Now, Mr. Zuckerberg, in the portion 12:42:57
20 of testimony we most recently viewed, where you 12:43:12
21 were talking to Senator Graham, you represented 12:43:16
22 that you don't give your News Feed team goals for 12:43:19
23 how much time people spend on your platforms and 12:43:23
24 that it was misinformation to say otherwise; is 12:43:26
25 that right? 12:43:31

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1 MR. SCHMIDT: Can I just put 12:43:31

2 the transcript in front of him? 12:43:32

3 I'll just show you that I've
4 underlined some of the things you've read,
5 but I just want him to have it. 12:43:34

6 MR. WARREN: Sure.

7 THE WITNESS: Okay. What 12:43:47
8 was your question? 12:43:48

9 BY MR. WARREN: 12:43:49

10 Q. My question was just refreshing 12:43:49
11 your recollection about one of the video clips we 12:43:50
12 watched in which you represented to Senator Graham 12:43:54
13 that you don't give your News Feed teams goals 12:43:57
14 about how much time people spend on your platforms, 12:44:01
15 right? 12:44:03

16 A. Yes. 12:44:03

17 Q. Okay. And you've testified to that 12:44:03
18 effect on other occasions, correct? 12:44:05

19 A. I believe so. 12:44:08

20 Q. Okay. I'm going to play you a clip 12:44:09
21 that we'll introduce as Exhibit 21. 12:44:14

22 And I will represent this is 12:44:18
23 available online on C-SPAN's website. 12:44:19

24 Gina, this is Tab 49. 12:44:23

25 MR. SCHMIDT: Just before 12:44:32

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CERTIFICATE

I HEREBY CERTIFY that the witness was duly sworn by me and that the deposition is a true record of the testimony given by the witness.

It was requested before completion of the deposition that the witness, MARK ZUCKERBERG, have the opportunity to read and sign the deposition transcript.

MICHELLE L. RIDGWAY,
Certified Shorthand Reporter,
(CA-CSR # 14592)
(Certified Court Reporter
(NJ-CCR # XI02126)
Registered Professional Reporter,
Certified Realtime Reporter
and Notary Public
Dated: April 1, 2025

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)