

EXHIBIT 11

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT) MDL No.
ADDICTION/PERSONAL INJURY) 4:22-md-3047-YGR
PRODUCTS LIABILITY LITIGATION)
_____)

COMMONWEALTH OF MASSACHUSETTS
SUFFOLK, ss SUPERIOR COURT

COMMONWEALTH OF MASSACHUSETTS,
Plaintiff, CIVIL ACTION NO.
2384CV02397-BLS1

v.
META PLATFORMS, INC. and
INSTAGRAM, LLC.

Defendants.

Monday, March 2, 2026

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Video-Recorded Oral Deposition of CARL
S. SABA held at the offices of Davis Polk &
Wardwell LLP, 900 Middlefield Road, Redwood
City, California, commencing at 9:03 AM PST
on the above date, before Michael E. Miller,
Fellow of the Academy of Professional
Reporters, Certified Court Reporter,
Registered Diplomate Reporter, Certified
Realtime Reporter, and California CSR #13649.

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1 Q. Yes.

2 A. It is related to the wrongful
3 acts.

4 Q. Is your understanding, from the
5 perspective of a damages expert, when you
6 calculate disgorgement, you're calculating
7 profits that would not have been earned but
8 for the alleged wrongful acts?

9 MR. BERGE: Objection to form.

10 MS. ARORA: Objection to form.

11 A. It's -- well, what I'm
12 calculating is profits that result from these
13 cohorts of teens who are using the platform
14 more than a certain amount of time, that is
15 the result of the alleged wrongful acts.

16 BY MR. WILLIAMS:

17 Q. And when you say the result is
18 caused by, you mean caused by the allegedly
19 wrongful acts, right?

20 A. Yes.

21 Q. In calculating your gross
22 profit figures, you did not perform any
23 causal analysis between those profits that
24 you calculated and the wrongful acts,
25 correct?

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1 MS. ARORA: Objection to form.

2 A. You mean did -- I did not
3 perform any analysis to establish a causation
4 in fact occurred?

5 BY MR. WILLIAMS:

6 Q. Correct.

7 A. Yes, I think I've said
8 throughout, I don't have opinions about
9 causation.

10 Q. You're not opining that the
11 gross profits you calculate were caused by
12 the allegedly wrongful acts, correct?

13 MS. ARORA: Objection to form.

14 A. No, I don't have an opinion
15 about that.

16 BY MR. WILLIAMS:

17 Q. And you didn't do any analysis
18 to establish that the gross profits you
19 calculate were caused by the allegedly
20 wrongful acts, correct?

21 MS. ARORA: Objection to form,
22 and asked and answered.

23 A. No, the analysis that I did was
24 that those profits are associated with those
25 groups of teens that I was asked to quantify.

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1 BY MR. WILLIAMS:

2 Q. I believe in response to one of
3 Dr. McCrary's critiques, you say that --
4 well, let me -- let me strike that.

5 So in response to one of
6 Dr. McCrary's critiques on your gross profits
7 opinion, is it fair to say that you believe
8 that calculating but-for profits would be a
9 speculative endeavor here?

10 MS. ARORA: Objection to form.

11 A. I think his but-for construct
12 is speculative, yes.

13 BY MR. WILLIAMS:

14 Q. Is there a but-for construct
15 that would not be speculative?

16 A. Not specific to this situation.

17 Q. So you can't think of any way
18 to calculate but-for profits that would not
19 be speculative, correct?

20 MS. ARORA: Objection to form,
21 and asked and answered.

22 MR. BERGE: Objection to form.

23 A. I'm not saying that I can't
24 think of any way to calculate those. I'm
25 saying that his framing of how to approach

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CERTIFICATE

I, MICHAEL E. MILLER, Fellow of the Academy of Professional Reporters, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, CARL S. SABA was duly sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that pursuant to FRCP Rule 30, signature of the witness was not requested by the witness or other party before the conclusion of the deposition.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.



MICHAEL E. MILLER, FAPR, RDR, CRR
Fellow of the Academy of Professional Reporters
NCRA Registered Diplomate Reporter
NCRA Certified Realtime Reporter
California CSR #13649
Dated: March 3, 2026