

Exhibit 48

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION/)
PERSONAL INJURY PRODUCTS) MDL No. 3047
LIABILITY LITIGATION)

SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE
COUNTY OF LOS ANGELES - SPRING STREET COURTHOUSE

COORDINATION PROCEEDING)
SPECIAL TITLE [RULE 3.400])

SOCIAL MEDIA CASES) Lead Case No.
22STCV21355

This Document Relates To)

STATE OF TENNESSEE, ex rel.)
JONATHAN SKRMETTI,)
ATTORNEY GENERAL and)
REPORTER,)
v.)
META PLATFORMS, INC., and)
INSTAGRAM, LLC.)

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
VIDEOTAPED DEPOSITION OF ANTIGONE DAVIS
VOLUME 1

MARCH 4, 2025

(Pages 1 - 376)

9:09 a.m. to 6:59 p.m.

Covington & Burling

850 10th St NW, Washington, DC 20001

Reported By: Amanda Blomstrom, RMR, CRR, and
CSR TX #8785/CA #12681/IL #84-3634

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1 MR. IMBROSCIO: You mean in addition to --
2 or, excuse me. I'm going to instruct her not to
3 answer anything that we've done in our preparation
4 session.

5 You can answer to the extent you've
6 reviewed transcripts outside of anything we -- we've
7 worked on together.

8 THE WITNESS: Outside of anything, no.

9 BY MR. KAUFMANN:

10 Q. Okay. What's your current position at
11 Meta?

12 A. I'm the Vice President and Global Head of
13 Safety at Meta for Safety Policy.

14 Q. And you're also a licensed attorney?

15 A. I don't know I -- I have a J.D. I passed
16 the bar. My license is no longer active.

17 Q. Okay. Do you provide any legal advice in
18 your role at Meta?

19 A. No.

20 Q. Have you provided any legal advice in your
21 role at Meta?

22 A. No. That would be against the rules

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1 for --

2 Q. Okay.

3 A. -- being a lawyer.

4 Q. Generally what does your team do?

5 A. So my team basically works on safety
6 policy across the company. We work -- the way I
7 think of our work is we try to take a 360-degree
8 approach: does the company have the right policies in
9 place with regard to, in particular, young people's
10 safety and well-being on the platform; does it
11 have the right tools, those are the tools in the
12 background, technology in the background, as well as
13 in the foreground; do we have the right resources and
14 support for both young people and their families; and
15 then, are we being informed by the important
16 stakeholders, so experts, in this area.

17 Q. And are those internal experts as well as
18 external experts?

19 A. Yeah. We -- we hire people internally,
20 and we also use external experts or work with
21 external experts.

22 Q. Okay. Are some of those external experts

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CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
VIDEOTAPED DEPOSITION OF ANTIGONE DAVIS
VOLUME 2

MARCH 5, 2025

(Pages 377 - 890)

9:03 a.m. to 8:01 p.m.

Covington & Burling

850 10th St NW, Washington, DC 20001

Reported By: Amanda Blomstrom, RMR, CRR, and
CSR TX #8785/CA #12681/IL #84-3634

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1 MR. IMBROSCIO: And while she's getting to
2 that --

3 THE WITNESS: Yes, I've got it.

4 MR. IMBROSCIO: -- page, obviously,
5 there's very dense text. She's not looked at it yet
6 just because she glanced through it. But if you're
7 going to ask her substantively about something, just
8 give her a moment to take a --

9 THE WITNESS: Yeah, I'm going to have to
10 look through --

11 MR. IMBROSCIO: -- look at it.

12 THE WITNESS: -- but go ahead and ask, and
13 then I can look.

14 BY MR. JANSSEN:

15 Q. Let me, I guess, start.

16 Do you recall this -- this deck, this
17 Youth Safety & Wellbeing Deep Dive slide deck?

18 A. I don't remember it specifically, but I'm
19 sure I was a part of it, so ...

20 Q. To the best of your knowledge, does this
21 appear to be a true and correct copy of the Youth
22 Safety & Wellbeing Deep Dive slide deck --

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1 MR. IMBROSCIO: Object to the form.

2 BY MR. JANSSEN:

3 Q. -- as you recall it?

4 A. Yes; yes.

5 MR. IMBROSCIO: Object to the form.

6 THE WITNESS: Sorry.

7 MR. IMBROSCIO: That's okay.

8 BY MR. JANSSEN:

9 Q. So are you at this page, the "Safety
10 Policy H1 Roadmap" --

11 A. That one --

12 Q. -- page?

13 A. -- yeah.

14 Q. Is a roadmap something of a look-ahead as
15 to what's being planned for?

16 A. Yeah. It's things that we're thinking
17 about, yes, doing.

18 Q. And on the next page it says, "Roadmap,
19 Safety, Health, and Well-being Policy."

20 Correct?

21 A. Yes.

22 Q. And below that there is a chart; is that