

Exhibit 49

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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
16 :
17 :
18 :
19 :
20 :
21 :
22 :
23 :
24 :
25 :
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 addiction externally, correct? 11:28:43

2 A. That's what it says. 11:28:45

3 Q. Can you turn to the page ending 11:28:46

4 in 183, just two forward. 11:28:48

5 Can you read the heading of this 11:28:52

6 slide, please. 11:29:03

7 A. Yes. Just, again, for the record, 11:29:04

8 I mean, I didn't write this. I'm just -- you asked 11:29:09

9 me to read this, so I will do that. 11:29:11

10 It says, "Problematic use affects 11:29:13

11 about 12.5 percent of people on Facebook." 11:29:14

12 Q. Okay. And you didn't write that, 11:29:17

13 but a Facebook employee did write that, correct? 11:29:18

14 A. Yes. I think a Facebook employee 11:29:21

15 put together this document. But it sounded like, 11:29:24

16 from the interim, this was done with -- in 11:29:28

17 partnership with folks externally too. So I'm not 11:29:32

18 sure where this number came from. This is 11:29:35

19 significantly higher than anything that I feel like 11:29:37

20 I've seen previously. 11:29:42

21 Q. Okay. In any event, Meta knew that 11:29:46

22 problematic use is a real issue for a meaningful 11:29:47

23 portion of its users, correct? 11:29:51

24 A. Yes. I mean, we study problematic 11:29:53

25 use because a meaningful number of people tell us 11:29:55

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1	that they are using the app more than they would	11:29:57
2	like to be. And we want to make sure that people	11:29:59
3	can use our apps in only the ways that they want	11:30:01
4	and that they are providing value in people's	11:30:04
5	lives.	11:30:06
6	Q. Okay. Please flip to the page	11:30:06
7	ending in 201.	11:30:08
8	MR. SCHMIDT: And when we're	11:30:12
9	done with this, let's take our break.	11:30:13
10	MR. WARREN: Sure.	11:30:15
11	BY MR. WARREN:	11:30:15
12	Q. There's a slide titled, "We heard	11:30:15
13	about 10+ triggers contributing to problematic use	11:30:18
14	habits."	11:30:22
15	Do you see that?	11:30:22
16	A. I'm sorry. Where are you? Nine?	11:30:23
17	Q. 201.	11:30:30
18	A. 201.	11:30:31
19	Okay. Okay.	11:30:33
20	Q. Let me re-ask the question.	11:30:43
21	This is a slide titled, "We heard	11:30:45
22	about 10+ triggers contributing to problematic use	11:30:47
23	habits," correct?	11:30:50
24	A. Yes. That's what the title says.	11:30:51
25	Q. And beneath that heading on the	11:30:55

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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

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. FOR
THIS DOCUMENT RELATES TO: :FILING
:PURPOSES

STATE OF TENNESSEE, ex rel, JONATHAN :22STCV21355
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 28, 2025
VOLUME II

Continued 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
10:16 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 in that. So I think that there were 10:21:48
2 definitely some sentiments similar to what 10:21:50
3 you said. 10:21:52

4 But, I mean, but I don't 10:21:53
5 agree with your earlier characterization 10:21:54
6 that the board wasn't involved. I mean, 10:21:56
7 they definitely -- you know, I talked to 10:21:58
8 them about it before we finalized it. I 10:21:59
9 would have needed to have done that. 10:22:01

10 BY MS. BAIG: 10:22:03

11 Q. Okay. Would you agree that you 10:22:03
12 have always retained complete control of the 10:22:04
13 company in terms of key decisionmaking? 10:22:06

14 MR. SCHMIDT: Objection. 10:22:09
15 Vague. 10:22:09

16 THE WITNESS: I generally 10:22:10
17 agree with that. I mean, there are 10:22:14
18 obviously limits to what any individual, 10:22:16
19 even if you're a controlling shareholder 10:22:20
20 and CEO, you know, there's tens of 10:22:22
21 thousands of people at the company, so 10:22:25
22 there are lots of people making decisions 10:22:26
23 that end up being really important, all the 10:22:28
24 time, that I don't get to weigh in on. 10:22:30

25 But -- but, yes, I've cared 10:22:32

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1	to continue to be the controlling	10:22:35
2	shareholder and chairman of the board and	10:22:38
3	CEO.	10:22:39
4	BY MS. BAIG:	10:22:40
5	Q. And you control more than	10:22:40
6	50 percent of the vote, correct?	10:22:41
7	A. Yes.	10:22:42
8	Q. Okay. We're handing you what's	10:22:43
9	been marked as Exhibit 73, which is a proxy	10:22:47
10	statement filed by Facebook, Inc., in 2017.	10:22:52
11	(Document marked for	10:22:55
12	identification as (Meta) Zuckerberg	
13	Exhibit 73.)	10:22:56
14	BY MS. BAIG:	10:22:56
15	Q. Do you see that?	10:22:56
16	A. Yes.	10:22:57
17	Q. And on Page 2, do you see it's	10:23:02
18	dated April 14, 2017?	10:23:06
19	A. Page 2.	10:23:07
20	Q. Mm-hmm.	10:23:13
21	A. April 14, 2017.	10:23:14
22	Q. And if you turn to Page 48 of the	10:23:15
23	proxy statement, you'll see that it is a	10:23:24
24	stockholder proposal regarding change in	10:23:28
25	stockholder voting?	10:23:30