

Exhibit 69

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)

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

COORDINATION PROCEEDING)
SPECIAL TITLE [RULE 3.400]) Lead Case No.
) 22STCV21355

SOCIAL MEDIA CASES)

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)

Tuesday, January 28, 2025
CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
Video-Recorded Oral Deposition of WENDY
GROSS PhD held at the offices of Covington &
Burling LLP, 3000 El Camino Real, 5 Palo Alto
Square, Suite 1000, Palo Alto, California,
commencing at 9:04 a.m. 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 BY MS. O'NEILL:

2 Q. Do you recognize this document?

3 A. I do. This is a -- the final
4 research report that I worked on with one of
5 my direct reports in the spring of 2022
6 around how we bring our youth and well-being
7 narrative to life for the company.

8 Q. So you -- just to be clear, you
9 contributed to this document, right?

10 A. Yes, I was very heavily
11 involved in this research.

12 Q. And it's from the marketing
13 insights team, your team, right?

14 A. Correct.

15 Q. Let's look at the third page.
16 This is the Background and Objectives.

17 Right under Background, you
18 wrote that: We are also on a journey to
19 reclaim and strengthen Instagram's relevance
20 with teens.

21 Right?

22 A. Yes.

23 Q. Meaning Meta was attempting to
24 become more relevant to teens, right?

25 MR. HALPERIN: Object to