

Exhibit 90

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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) :LEAD CASE
:NO. FOR
SOCIAL MEDIA CASES :FILING
:PURPOSES
:22STCV21355
:

- - -
CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
DEPOSITION UNDER VIDEO EXAMINATION OF
LOTTE RUBAEK
April 1, 2025

Videotaped deposition of LOTTE RUBAEK taken
pursuant to notice, was held at the law offices of
Lieff Cabraser Heimann & Bernstein, 250 Hudson
Street, New York, New York, beginning at 9:03 a.m.
Eastern, 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 the topics we are talking about today,
2 suicide and nonsuicidal self-injury.

3 BY MS. FLOWERS:

4 Q. And these are impressions that
5 you've -- sorry. Strike that.

6 These are observations that you've
7 gained from your own clinical practice; is that
8 right?

9 MR. CHAPUT: Object to the
10 form.

11 THE WITNESS: These are
12 observations from my own clinical practice,
13 and it is also based on research.

14 BY MS. FLOWERS:

15 Q. Did there come a time when you
16 resigned from the expert panel?

17 A. Yes. I resigned from the expert
18 panel March -- so a year ago, March 2024.

19 Q. What happened to lead you to resign
20 from the expert advisory board?

21 A. I had been -- I had been thinking
22 about doing it almost all the time I was there,
23 because I quickly realized that my expertise was
24 not used in the expert group.

25 In a period, for a while, I also

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1 stayed there to see how does this group work. Do
2 they ever follow up on anything that they present
3 us with.

4 And -- but the thing that led to my
5 resignation was that we had a new documentary in
6 Denmark that was about children seeing harmful --
7 being exposed to harmful content, not only about
8 suicide and nonsuicidal self-injury, but harmful
9 content in general on social media. It could also
10 be a disfigured or misshapen persons. It could be
11 traffic -- deadly traffic accidents. It could be
12 rapes. It could be suicide videos, and so on and
13 so on. Animal cruelty. And I was also giving
14 interviews to that documentary.

15 And when I was -- they insisted
16 that a part of my title in the documentary should
17 be not only my -- where I work and my profession
18 but also that I was a member of the SSI expert
19 group in Meta.

20 And then I realized that I couldn't
21 represent Meta that way, because I couldn't -- I
22 can't guarantee in any way that they are listening
23 to the experts of that group. That was not my
24 impression.

25 So it just became obvious to me

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1 that I couldn't -- I couldn't let the public think
2 that Meta had an expert group that they were
3 actually using. So I didn't want to -- I couldn't
4 see how I could give them this kind of credibility
5 or legitimacy.

6 Q. Was it Meta that insisted on you --
7 on --

8 A. No, that was the production.

9 Q. The documentary filmmaker's
10 assistant?

11 A. Yes, it was.

12 Q. Thank you.

13 Over the course of the three-plus
14 years that you served on the expert advisory board,
15 did you see any of the changes that you had hoped
16 to see in Meta's conduct over time?

17 MR. CHAPUT: Object to form.
18 Foundation.

19 THE WITNESS: No, I didn't
20 observe any changes.

21 BY MS. FLOWERS:

22 Q. Did you see any improvements in the
23 platform itself?

24 MR. CHAPUT: Same
25 objections.

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1 THE WITNESS: No, I didn't
2 see any improvements. My patient didn't
3 report any improvements either.

4 BY MS. FLOWERS:

5 Q. So you haven't seen any decline in
6 mental health disorders in your patients --

7 A. No.

8 Q. -- over time?

9 A. No. I've only seen things getting
10 worse, more extreme.

11 Q. And since leaving the -- Meta's
12 Global SSI Advisory Board, have you continued to be
13 critical of Meta's platforms and the impact on
14 kids?

15 A. Yes, I have.

16 Q. The documentary you just mentioned,
17 has it -- has it aired yet?

18 A. The documentary I just mentioned,
19 yes, it's called "Home Alone on the Internet."

20 Q. Was that in Danish as well?

21 A. Yes, it is.

22 And it is also about how young
23 people have these shocking experiences online and
24 that they are not talking to their parents about
25 them. Yeah.