

Exhibit 21

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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 - ATTORNEYS' EYES ONLY
PURSUANT TO PROTECTIVE ORDER
VOLUME 1

VIDEO-RECORDED
DEPOSITION OF ARTURO BEJAR
(Pages 1 - 351)

Held at Baker Botts
1001 Page Mill Road, Palo Alto, California
Monday, April 7, 2025, 9:20 a.m.

- - - -
REPORTED BY: ELAINA BULDA-JONES, CSR 11720

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1 A. I am, yes.

2 MS. JONES: Excuse me.

3 THE WITNESS: Sorry.

4 MS. JONES: Objection to the form.

5 BY MR. CARTMELL:

6 Q. Are you familiar, as an online child
7 safety expert, with the problem of teenage or kids
8 getting addicted to social media?

9 MS. JONES: Same objection.

10 THE WITNESS: I am, yes.

11 BY MR. CARTMELL:

12 Q. I've seen documents of -- that sometimes
13 it's referred to problematic use; is that right?

14 A. That is correct.

15 Q. Did Meta actually use the phrase
16 "problematic use" and "addiction" interchangeably?

17 A. It is my understanding that you were not
18 supposed to say "addiction." You were supposed to
19 say "problematic use."

20 Q. Did you have an understanding why that
21 was?

22 MS. JONES: Objection. Foundation.

23 THE WITNESS: Yes, I did.

24 BY MR. CARTMELL:

25 Q. What's that?

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1 A. So when I returned in my second stint, one
2 of the people I sought out was Jennifer Guadagno,
3 who had been a lead researcher in my first stint at
4 understanding the harm that people were experiencing
5 that we used to guide the work that we did in my
6 first stint.

7 And I wanted to understand because she was
8 working on well-being metrics and I wanted to orient
9 myself about what work was being done. And I talked
10 about it with her. I asked her about addiction.
11 Because I had already seen research come out and I
12 had also been experiencing it at home.

13 And the -- she told me in that
14 conversation that the topic was somewhat
15 radioactive. That you weren't supposed to use the
16 term "addiction." That when you looked into it that
17 it would get attention from the leadership of her
18 organization. And that you -- you couldn't call it
19 addiction. That instead they had labeled it
20 "problematic use." And then they had defined
21 problematic use to be very narrow.

22 So let's say -- this is not the accurate
23 number, but it's going to be, like, yeah, you have
24 to be on there for, like, ten hours a day in order
25 to be able to call it problematic use, which meant

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1 that the company could say things like, oh, we've
2 looked into problematic use and it's not an issue.

3 And it's not what I would understand.
4 When I heard the word "problematic use," I would
5 probably think what a lot of people were
6 experiencing. And so my understanding from talking
7 to her is if you're going to work on it you're going
8 to get a lot of attention on you.

9 And they had redefined the language around
10 the subject matter so it was not studied and
11 understood in what I believe is sort of good faith
12 of these issues.

13 Q. Was Meta actually even monitoring kids'
14 addiction to Instagram or problematic use at
15 Instagram at that time?

16 A. Not as far as I know.

17 Q. They didn't include it in any surveys, did
18 they?

19 MS. JONES: Let me object to foundation.
20 Go ahead.

21 THE WITNESS: Not as far as I know.

22 And when I started working with the
23 well-being team, again, I met with many people,
24 covered many issues, and there was not a single
25 mention of addiction in that context that I recall.