

Exhibit 96

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Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT) MDL Number:
ADDICTION/PERSONAL INJURY PRODUCTS) 4:22-MD-C047-YGR
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. for
_____) Filing Purposes
_____) 22STCV21355
_____)

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
VIDEOTAPED DEPOSITION of JENNIFER GUADAGNO, PhD
Palo Alto, California - November 14, 2024

Job No. 6933436
Pages 1 - 352
Stenographically reported by:
JENNY L. GRIFFIN, RMR, CSR, CRR, CCRR, CRC
CSR No. 3969

CONFIDENTIAL

Page 91

1 well-being for the product to be shipped not only
2 for Instagram but for Facebook?

3 A. I believe that was what we believed could
4 be helpful for well-being.

5 Q. Would it have been important for teens to
6 have the product shipped for both Facebook and
7 Instagram?

8 MR. SNEED: Object to form.

9 THE WITNESS: I'm not so sure of that. I
10 don't remember the breakdown of teens' usage across
11 both platforms or where -- or how this was playing
12 out across platforms.

13 BY MS. HAZAM:

14 Q. Well, you just said it was important for
15 well-being. Would it be important for teen
16 well-being to have the product shipped on both apps?

17 A. It would be important for teen well-being,
18 and, ideally, teens are able to access this.
19 There -- may be more important on one platform
20 versus the other, but still generally this is an
21 issue that relates to well-being and that's related
22 to teens. That could be related to teens, or some
23 teens, at least.

24 Q. Would it have been better for well-being to
25 have it be opt out versus by default?

CONFIDENTIAL

Page 92

1 A. I don't know that I can answer that exactly
2 in a precise way.

3 Q. Okay. You can put that exhibit aside.

4 Ms. Guadagno, I'd like to talk to you about
5 beautification filters.

6 Do you have an understanding of what I mean
7 when I refer to beautification filters?

8 A. I do.

9 Q. What's your understanding?

10 A. A filter or an overlay on top of a photo or
11 video, generally of a person's face or appearance,
12 that alters the appearance in some way.

13 Q. And are these effects used on Meta's apps
14 to enhance a user's appearance?

15 A. It could be used to slightly change or
16 change in a dramatic way.

17 Q. Are they often used to enhance a user's
18 appearance?

19 MR. KEATS: Asked and answered.

20 THE WITNESS: I think there are different
21 applications for filters that change the look of a
22 person's appearance.

23 BY MS. HAZAM:

24 Q. So that wasn't the question. The question
25 was are they often used to enhance a user's

CONFIDENTIAL

Page 93

1 appearance?

2 MR. KEATS: Asked and answered.

3 THE WITNESS: There's different ways that
4 it can be used to change a person's appearance.

5 BY MS. HAZAM:

6 Q. Does that include enhancing a person's
7 appearance?

8 A. It could include enhancing.

9 Q. And they are used this way both on Facebook
10 and Instagram; correct?

11 A. I don't know about how that works on
12 Facebook. I'm not sure on Facebook. But on
13 Instagram, I know that to be the case.

14 Q. These effects were sometimes referred to
15 within Meta by different terms, not just
16 beautification filters; right?

17 A. It's very likely.

18 Q. Do you remember any of those other terms?

19 A. So beautification filters, there are some
20 on the more -- some were called cosmetic features.
21 I'm not sure of others.

22 Q. Did you use the term "cosmetic surgery
23 filters"?

24 A. That term was used for a subset of them, I
25 believe.

CONFIDENTIAL

Page 155

1 A. Yes.

2 Q. That research indicated that cosmetic
3 surgery filters or beautification filters pose
4 significant risks to mental health and well-being of
5 young women in particular; right?

6 A. Yes. Pose potential risks for calling out
7 that population.

8 Q. Okay. As far as you're aware, Meta did not
9 make that research available to teenage users or
10 their parents at any time, did it?

11 A. I'm not aware of that.

12 Q. Okay. What about when it lifted the ban on
13 cosmetic surgery filters? Did it make that research
14 available to the public at the time?

15 A. I'm not aware of that.

16 Q. You're not aware of the company releasing
17 any information about the risks posed by cosmetic
18 filters to teens, to users of the public at any
19 time, are you?

20 A. I'm not sure of all the channels or things
21 of where -- how this was discussed; so I don't
22 exactly know. But I'm not aware of anything
23 specifically.

24 MS. HAZAM: Let's look at Exhibit U.

25 ///