

Exhibit 167

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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IN RE: SOCIAL MEDIA ADOLESCENT) MDL No. 4:22-md-
ADDITION/PERSONAL INJURY) 3047-YGR
PRODUCTS LIABILITY LITIGATION)

-----X
This Document Relates to)
)
)

ALL ACTIONS)
)
-----X

Confidential - Pursuant to Protective Order

30(b)(6) DEPOSITION OF META, INC.,

by and through its Designated

Representative,

JESSICA WALTON

SAN FRANCISCO, CALIFORNIA

JUNE 6, 2025

9:18 A.M.

Job No.: 7390004

Pages: 1 - 142

Reported by: Leslie A. Todd, CSR No. 5129 and RPR

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1 BY MS. ARORA:

2 Q. So when we left off, we were
3 looking at the Volume 216 cover letter, and
4 specifically, the final sentence on the first
5 page. Do you recall that?

6 A. Yes, I do.

7 Q. And we were discussing the
8 random sample of 1 percent of global
9 Instagram users per day that is mentioned in
10 that letter. Do you recall that?

11 A. Yes, I do.

12 Q. Do you have any reason to
13 believe that that random sample is not
14 representative of Instagram adult users in
15 the United States?

16 MS. JONES: Let me object to
17 form. And scope. You can answer if
18 you know in your individual capacity.

19 THE WITNESS: I don't have a
20 reason to believe it's not. I just do
21 not -- I don't know.

22 BY MS. ARORA:

23 Q. Now, let's look at the footnote
24 at the bottom of page 2 of that cover letter.
25 The footnote reads, "The data contained in

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1 today's production shows a negligible number
2 of daily active users in the zero to 12
3 stated age bracket, negligible amount of
4 advertising revenue attributable to those
5 users, and negligible calculated average
6 advertising revenue per user for those users.
7 These results are due to errors in the
8 underlying data maintained by Meta."

9 Did I read that correctly?

10 A. You did, yes.

11 Q. Are you familiar with what this
12 error is?

13 A. I spoke to Harsh about this
14 briefly, and my understanding is that it's
15 being investigated. But it appears, for
16 example, that if a user tries to -- they've
17 already been on the platform, and they try to
18 change their age to something under 13 for
19 some reason, they will then be checkpointed
20 again, meaning, like, they will be -- they
21 will go through a process flow to have to
22 revalidate that they're above 13, or their
23 account will be deactivated.

24 And when that, you know,
25 basically, process kicks off, for whatever