

Exhibit 13

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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)
-----)
THIS DOCUMENT RELATES)
ALL ACTIONS)
-----)

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Wednesday, December 10, 2025

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CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
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Video-Recorded Oral Deposition of LARS
BACKSTROM, PhD, held at the offices of
Covington & Burling LLP, 3000 El Camino Real,
10th Floor, Palo Alto, California commencing
at 9:09 am 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 AI models in ranking and recommendation?

2 A. Not directly. I believe we
3 use, you know, some of the content
4 understanding capabilities as one of the
5 signals that feeds into the feed ranking
6 algorithm, but that is not -- it is not
7 directly using generative AI, nor are we
8 training the generative AI models as part of
9 the Feed.

10 Q. I want to go back to a question
11 about machine learning in a previous
12 iteration of Feed when the machine learning
13 model was trained on batches.

14 Do you recall -- I think you
15 may have mentioned a previous version that
16 was trained on batches of information?

17 A. Yes.

18 Q. Okay. How frequently would
19 those batches of information be updated?

20 A. That varied over the course of
21 the, you know, system. Over time, we've
22 moved to more and more frequent.

23 You know, when we switched from
24 batch training to more continuous training, I
25 think we were generally doing daily, and we

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1 would train daily, but using a batch of, you
2 know, many days of data. I think at the
3 time -- I don't remember if it was 30 or 90
4 days, and I think there's some trade-off
5 there in terms of the system sort of compute
6 time required versus the model quality.

7 But we would train on a block
8 of, say, 30 days, and we would do that every
9 day, so it would be this sort of sliding
10 window of 30 days. Or maybe 90 days. I
11 don't remember the exact sort of number. And
12 it was probably different for different
13 models as well.

14 Q. Do you recall when, what year
15 that would have been?

16 A. Well, I think we still have a
17 mixed system where some of the models -- you
18 know, some of the less critical models are
19 trained using that methodology.

20 I think the main Feed models --
21 I would be speculating a little bit on the
22 exact timeline, but I would guess in the sort
23 of 2019-2020 time frame, somewhere around
24 there.

25 Q. Meta also uses embeddings in

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1 some sliding window of data, you know, would
2 include data from recent days where the user
3 was active, even if they were not active
4 today.

5 BY MR. COCANOUGHER:

6 Q. And does Meta still use that
7 batch training in their models?

8 MR. CHAPUT: Asked and
9 answered.

10 A. In some cases.

11 BY MR. COCANOUGHER:

12 Q. For the models using the batch
13 data, are those models trained on photos?

14 MR. CHAPUT: Objection, vague.

15 A. Which models in particular? Do
16 you mean the feed ranking models when you say
17 those models?

18 BY MR. COCANOUGHER:

19 Q. Sorry. Let's do that.

20 For the Feed ranking models
21 that use the batch process, are those models
22 trained on the user's photos?

23 MR. CHAPUT: Objection, form.

24 A. They would be trained on data
25 from Feed, which would include, you know, a

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1 variety of posts, including photos.

2 BY MR. COCANOUGHER:

3 Q. Would that data from Feed also
4 include videos or audio files?

5 A. I don't think we really have
6 audio, but would include video.

7 I should clarify that we're
8 training mostly on the metadata of the posts,
9 and so, you know, while it may be sort of
10 active research of how we would use the raw
11 pixels of the photos or raw content of the
12 videos, the training is generally happening
13 on -- you know, not on those raw pixels, but
14 on various pieces of metadata about the posts
15 which might include whether or not it's a
16 photo or a video or the video length.

17 And then the way that we, you
18 know, maybe use aspects of the raw pixels are
19 through, you know, some of the other models
20 that feed into ranking.

21 So I described a little bit
22 previously, we might have a separate model
23 which maps from a piece of content to a
24 topic, for instance. And that would be sort
25 of outside the scope of the feed ranking

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1 models but would be a model that takes a --
2 you know, the pixels of a photo and then
3 tries to predict which -- what the topic of
4 that photo is, and then the feed ranking
5 algorithm might consume that topic as an
6 input.

7 Q. What about for the feed ranking
8 model, would the metadata from a user name be
9 included in that?

10 MR. CHAPUT: Objection, form.

11 A. I don't recall us ever using
12 user name. I think, you know, in principle,
13 it might be, but I don't think that that
14 would be a very useful feature.

15 And I don't recall that we ever
16 tried to -- you know, it's possible that we
17 did, but I would be a little bit surprised if
18 that was one of the features that we used.

19 BY MR. COCANOUGHER:

20 Q. What about user IDs?

21 MR. CHAPUT: Objection, form.

22 A. So the main way that user IDs
23 would be used is less as a raw feature,
24 because, ultimately, it's sort of a random
25 number that doesn't have very much meaning,

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1 and so it would be hard for the model to, you
2 know, learn anything from the ID directly.

3 But, you know, to -- the ID
4 would be used to retrieve some of my, like,
5 past, you know, historical interactions,
6 where one of the features might be how many,
7 you know, likes have I given to this
8 particular user, and then there would be some
9 lookup where you would map from -- say, okay,
10 for this specific user, you would look up how
11 many times have I liked that person's content
12 in the past.

13 BY MR. COCANOUGHER:

14 Q. What about cookie IDs?

15 A. I don't think that we have ever
16 looked at that, and I don't see how it would
17 be useful.

18 Yeah, from all the work I can
19 recall of adding the features and looking at
20 the various feature importance, I don't think
21 cookie ID has ever appeared.

22 Q. IP addresses?

23 A. Yeah, in some ways, similar to
24 ID, like, the IP address is not going to be a
25 very useful signal, and I'm pretty sure we've

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1 never used that as a feature directly.

2 I think it is probably one of
3 the inputs into, you know, location, and so
4 at a very, like, course granularity, I think
5 it's sort of, like, quite imperfect, but we
6 can estimate what country a person is in
7 based on their IP address.

8 And while that is, you know,
9 not a definitive sort of answer to what
10 country they're in for a variety of reasons,
11 that's the type of thing where IP addresses
12 maybe had some -- it has not been directly
13 used, but has translated into some feature
14 that then has been used.

15 Q. What about users' precise
16 locations?

17 MR. CHAPUT: Objection, form,
18 vague.

19 A. I don't think that we've
20 ever -- I'm pretty confident we've never used
21 the precise location. I think the variance
22 of location that I've seen, like the most
23 granular, are more at the sort of, like,
24 scale of a, like, city, or I guess for large
25 cities, maybe somewhat more granular. Not --

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1 and I am kind of coming back to what's going
2 to be useful for the algorithms.

3 What's useful to a consumer is
4 generally not going to depend on their
5 precise location. Even if, you know, we
6 wanted to use it, it's something that isn't
7 available much of the time and is not going
8 to be as useful as the sort of -- if I live
9 in the Bay Area, I'm interested in Bay Area
10 news sort of more broadly, or maybe like I
11 live in Atherton, I'm interested in Atherton
12 news, as opposed to the exact location.

13 So I don't think we've ever
14 pursued that.

15 BY MR. COCANOUGHER:

16 Q. Just two more. Information
17 about users such as age or gender?

18 MR. CHAPUT: Objection, form.

19 A. We have used age and gender in
20 our ranking algorithms as features.

21 BY MR. COCANOUGHER:

22 Q. Data about how a particular
23 user interacted with content on the platform.

24 MR. CHAPUT: Objection, form.

25 A. I guess maybe I'm not

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1 understanding, because to a certain extent,
2 much of my -- as I described earlier, we are
3 trying to ascertain a specific user's
4 interests based on, you know, who they've
5 interacted with, for instance, or what
6 content they've interacted with or, you know,
7 what pages they follow or a number of other
8 kind of behaviors on the platform. And so we
9 are using those things as inputs into the
10 ranking algorithm.

11 BY MR. COCANOUGHER:

12 Q. All right. I want to talk now,
13 move to teen engagement.

14 MR. COCANOUGHER: Can we pull
15 up Tab 5, and we'll mark this as
16 Exhibit 4.

17 (Whereupon, Backstrom-4,
18 E-mail(s) re: Teens,
19 META3047MDL-040-00240836 -
20 META3047MDL-040-00240837, was marked
21 for identification.)

22 BY MR. COCANOUGHER:

23 Q. All right. Mr. Backstrom, this
24 is an e-mail sent to you, correct?

25 A. No.

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1 Q. If that user attempts to
2 complete the checkpoint by providing
3 information confirming that they are under 13
4 years old, at that point, Meta will disable
5 the account; is that fair?

6 A. I believe, yes.

7 Q. If the user does not respond at
8 all within 30 days of being checkpointed,
9 Meta will disable the account; is that fair?

10 A. Yes.

11 Q. And when we -- when I'm saying
12 disable, can you describe what happens when
13 Meta disables an account?

14 MR. CHAPUT: Object to form.

15 A. They can no longer log in and
16 they can't use any of the services -- well,
17 yeah, I guess, sorry. That's -- when it's
18 checkpointed, you can't use any of the
19 services.

20 Once it's disabled, I think at
21 that point, it's not -- your sort of time is
22 already expired, so beyond just not being
23 able to log in, your account is sort of on a
24 path towards deletion.

25 And then on the other side, the

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1 account is disabled, and so nobody can see
2 the content that was, you know, previously
3 produced by that account.

4 If you navigate to the profile,
5 it would not exist. It would be as if you
6 went to a nonexistent profile, et cetera.

7 BY MR. COCANOUGHER:

8 Q. And just so I'm clear, the
9 scenario when if you went to the account
10 there would be no account and it looked like
11 it didn't exist, that would be once the user
12 is checkpointed? The first step, I guess?

13 A. That's my understanding, though
14 I guess I would say it's like a little bit
15 outside of my area of sort of expertise.

16 But I believe once it's
17 checkpointed, until that checkpoint is
18 cleared, the account is in a disabled state,
19 which would mean in the disabled state, you
20 can no longer see the content.

21 Q. During the period of time after
22 a user has been checkpointed but before Meta
23 disables the account, Meta uses the user's
24 data to train their machine learning models,
25 correct?

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1 MR. CHAPUT: Object to form,
2 incomplete hypothetical.

3 A. During that period, the account
4 is only suspected, and so, you know, I think
5 a number of those users eventually clear
6 those checkpoints. So while it's in the
7 checkpoint state, it is sort of uncertain as
8 to whether or not the account is under 13.

9 BY MR. COCANOUGH:ER:

10 Q. And so in that scenario, Meta
11 is still using that user's data to train
12 their machine learning models, right?

13 MR. CHAPUT: Object to the
14 form, incomplete hypothetical.

15 A. My understanding is that the
16 kind of like hard guarantees of not using
17 data are not in effect during that period.

18 You know, so there may be --
19 you know, it's sort of flagged as being
20 checkpointed, and so I'm not sure exactly,
21 you know, all of the implications of that
22 flag.

23 But the sort of much more
24 affirmative guarantees about not using data
25 do not come into play until either the 30

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1 days expired or the user is confirmed to be
2 under 13.

3 BY MR. COCANOUGHER:

4 Q. During that same period of
5 time, do you know if Meta uses the same --
6 the checkpointed user's data to train their
7 generative AI models?

8 MR. CHAPUT: Object to the
9 form, incomplete hypothetical, vague
10 as to what period of time is being
11 discussed.

12 A. I'm not familiar with the exact
13 sort of data filtering of the gen AI team. I
14 think the accounts are flagged as being
15 checkpointed, but the gen AI team is separate
16 from the feed ranking team, and so not aware
17 of the sort of nuances of exactly how those
18 flags are used.

19 BY MR. COCANOUGHER:

20 Q. Once the user's account is
21 disabled, Meta begins the process to begin
22 deleting that user's data, correct?

23 MR. CHAPUT: Object to form,
24 incomplete hypothetical, vague.

25 A. I think for -- in many senses,

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1 the account is disabled while they're in the
2 checkpoint in that they can't use it and you
3 can't see that user's data.

4 The process of deletion begins
5 when the 30 days expires or when the user is
6 confirmed to be under 13.

7 Q. So when that happens, so when
8 the user's account is disabled and Meta
9 begins the process to begin deleting the
10 user's data, the first step is to flag that
11 that user's data is not intended to be used
12 for business purposes, correct?

13 MR. CHAPUT: Object to form,
14 incomplete hypothetical, asked and
15 answered in Mr. Backstrom's prior
16 deposition in this matter.

17 A. Yes. Once the 30 days is
18 expired or the user is confirmed, then the
19 data is flagged for deletion and is not
20 intended for business purposes.

21 BY MR. COCANOUGHER:

22 Q. But it is not the case that
23 immediately after an account is disabled that
24 user's data is removed from business use,
25 correct?

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1 MR. CHAPUT: Object to form,
2 vague, incomplete hypothetical.

3 A. I think it is -- so I think it
4 is a 45-day sort of period after the 30 days
5 has expired for things like legal review and
6 to ensure that that is not needed for ongoing
7 investigations and things of that nature.

8 And so, you know, during that
9 period, the data has not been fully deleted,
10 and while the -- it is not intended for
11 business purposes, the sort of more
12 affirmative deletion does not happen
13 immediately.

14 BY MR. COCANOUGHER:

15 Q. And so there's a 45-day period
16 in which, after a user's account is disabled,
17 there's then a 45-day period in which, as you
18 described, certain things happen before the
19 data is actually deleted?

20 MR. CHAPUT: Object to form,
21 asked and answered, incomplete
22 hypothetical, vague.

23 A. There is a 45-day review for
24 those -- for, like, I think primarily, like,
25 to understand if it is necessary for legal

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1 retention. And then at the expiration of
2 those 45 days, the deletion process sort of
3 fully begins.

4 BY MR. COCANOUGHER:

5 Q. Okay. So is there a period of
6 time during which some of the user's data is
7 used to train Meta's machine learning models
8 before the not-for-business-use flag
9 propagates to remove all of the suspected
10 under-13 user's data from Meta's training
11 systems?

12 MR. CHAPUT: Objection to the
13 form, vague, incomplete hypothetical,
14 asked and answered.

15 A. I am not familiar with the
16 specifics of exactly sort of the actual
17 propagation delays.

18 I think the thing that we are,
19 you know, very sort of diligent about
20 enforcing are the guaranteed delays. I think
21 in some cases, it will happen faster, and
22 some of this depends on the sort of
23 implementation details of the system, exactly
24 how long these various flags propagate
25 through the sort of various aspects of the

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1 system.

2 The main, I think, guarantees
3 are around those sort of time windows that I
4 already described.

5 BY MR. COCANOUGHER:

6 Q. The same question for Meta's
7 generative AI models.

8 MR. CHAPUT: Objection, form,
9 vague, lacks foundation.

10 A. The same processes apply to the
11 generative AI models.

12 BY MR. COCANOUGHER:

13 Q. So I guess in that 45-day
14 period, which could be shorter for some,
15 could be longer for some, that user's
16 information is going into Meta's machine
17 learning models; is that fair?

18 MR. CHAPUT: Objection, asked
19 and answered, mischaracterizes
20 testimony.

21 A. I couldn't affirmatively say
22 that in that, you know, I'm not familiar with
23 what additional filtering the generative AI
24 team might do on the data that they use.

25 So I'm more familiar with the

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1 sort of, like, guarantees, but nothing would
2 prohibit a team from going above and beyond
3 the guarantees that I've described.

4 BY MR. COCANOUGHER:

5 Q. What is the shortest period of
6 time that you are aware of that this
7 situation that we've been discussing, where a
8 user gets -- whose profile is disabled,
9 what's the shortest period of time that
10 you're aware of in which that information was
11 then deleted?

12 MR. CHAPUT: Object to form,
13 lacks foundation, incomplete
14 hypothetical, vague.

15 A. I don't know what the shortest
16 period of time would be, and I think that
17 data would exist in -- for an entire account,
18 there would be a lot of data associated with
19 that account, and the different pieces of
20 data would have, you know, somewhat different
21 latencies.

22 But I don't know the specifics
23 of how quickly the shortest period of time
24 is.

25 ///

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1 BY MR. COCANOUGHER:

2 Q. Same question for the longest
3 period of time?

4 MR. CHAPUT: Same objections.

5 A. I don't know what the longest
6 period of time is in practice. The
7 guarantees that are provided are that once
8 the deletion process begins, the -- it is
9 finished within 90 days.

10 BY MR. COCANOUGHER:

11 Q. So can you -- just so I'm
12 clear, can you describe to me the difference
13 in what is the 45-day period and what is the
14 90-day period?

15 MR. CHAPUT: Objection, asked
16 and answered. The witness has
17 explained it numerous times now.
18 You've already had a 30(b)(6)
19 deposition on this. He's also
20 explained that this is not the core
21 area of his expertise.

22 A. The 45 days is for a review to
23 determine whether or not the data should be
24 deleted. And so in some cases, if that sort
25 of review concludes that the data needs to be

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1 retained for some reason, then the deletion
2 process will not begin.

3 Once the deletion process
4 begins, then the 90 days begin -- window
5 begins, and that is the period not sort of
6 unique to this sort of scenario, but for data
7 deletion in general, that data must be
8 deleted within 90 days of that deletion
9 process beginning.

10 BY MR. COCANOUGHER:

11 Q. Okay. So could the data for
12 this user be available for model training
13 during the 45-day period after the account
14 fails the checkpoint and also during the
15 following 90-day period once the deletion
16 process begins?

17 MR. CHAPUT: Compound,
18 incomplete hypothetical, vague, lacks
19 foundation.

20 A. I think in order to answer that
21 for the specific sort of systems in question,
22 we'd have to dig into the sort of actual
23 implementations, and so I don't know off the
24 top of my head what the sort of actual
25 latencies are for the deletion process.

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1 I think I'm more familiar with
2 these sort of hard guarantees that we must
3 comply with than with the kind of, like,
4 actual implementation, which, you know, might
5 be faster than that, so...

6 BY MR. COCANOUGHER:

7 Q. And can you explain again what
8 is the hard guarantee? Is that the 45-day
9 period?

10 MR. CHAPUT: Objection, asked
11 and answered.

12 MR. ANDREWS: Let him finish
13 his question.

14 MR. CHAPUT: Counsel, we have
15 someone taking the deposition.

16 MR. ANDREWS: Yeah, and let him
17 finish.

18 MR. CHAPUT: There is no need
19 for you to intervene. He was finished
20 with his question.

21 Counsel, please, go ahead.

22 BY MR. COCANOUGHER:

23 Q. Can you describe what the hard
24 guarantee is that you were talking about
25 earlier?

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1 A. I was referring to the 45 and
2 the 90 days.

3 Q. Both of those are hard
4 guarantees?

5 A. Yes.

6 Q. I guess, let me break down one
7 of my previous long questions into two
8 questions.

9 So that user's data could be
10 available for model training during the
11 45-day period after the account fails the
12 checkpoint, right?

13 MR. CHAPUT: Objection,
14 incomplete hypothetical, lacks
15 foundation, vague.

16 A. Again, I think whether or not
17 it was would depend on the specific
18 implementation of the, you know, specific
19 training system.

20 And so while, you know, the,
21 like, guarantee that we ensure with a high
22 degree of rigor is 45 days, the actual
23 implementation is somewhere in that window,
24 and I'm not familiar with the, you know,
25 exact sort of system latencies that would

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1 answer your question on the exact timelines
2 that it undergoes.

3 BY MR. COCANOUGHER:

4 Q. Let's say the implementation
5 took the full 45 days.

6 Do you know if, for that
7 particular situation, if that data would be
8 used in the model?

9 MR. CHAPUT: Objection, vague,
10 incomplete hypothetical.

11 A. I guess, if the implementation
12 were to only remove the data after 45 days,
13 then it would be used for 45 days.

14 I guess, in your hypothetical,
15 it seems like somewhat tautological that
16 you're saying if it were there for 45 days,
17 would it be there for 45 days? So it's yes.

18 BY MR. COCANOUGHER:

19 Q. So we don't know -- in that 45
20 days, we don't know whether it's deleted on
21 day 1 or day 45, but for whatever period --
22 practically, for whatever period of time in
23 that 45 days -- strike that. I confused
24 myself.

25 And so the guarantee, when you

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1 say hard guarantee, is that Meta doesn't use
2 the data for model training after 45 days if
3 an account fails the checkpoint?

4 MR. CHAPUT: Object to the
5 form, vague, incomplete hypothetical,
6 lacks foundation.

7 A. After 45 days, the deletion
8 process begins, if the data was not flagged
9 for retention.

10 BY MR. COCANOUGHER:

11 Q. So for the second guarantee,
12 which is the 90-day period, is there any
13 amount of time in that 90-day period in which
14 the data still goes into the models?

15 MR. CHAPUT: Object to the
16 form, vague, incomplete hypothetical,
17 lacks foundation.

18 A. Similar answer in that the
19 guarantees that we kind of, like, rigorously
20 abide by are the 90-day deletion window. The
21 exact implementation time, I'm not
22 specifically aware of.

23 BY MR. COCANOUGHER:

24 Q. And are you aware of whether
25 the implementation time varies -- can vary?