

Exhibit 5

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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 KYLE ANDREWS, PhD
Palo Alto, California
November 19, 2024

Job No. 6933449
Pages 1 - 418
Stenographically reported by:
JENNY L. GRIFFIN, RMR, CSR, CRR, CCRR, CRC
CSR No. 3969

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1 BY MR. PHELPS:

2 Q. Okay. And at all times, though, Lori sat
3 above you on the org chart. I think you testified
4 to that, but do I have that correct?

5 A. Yes. She was always a manager.

6 Q. Okay. And [REDACTED] filled out this
7 to-be-hired role?

8 Did I understand that correctly?

9 A. Yes.

10 Q. Focusing on your name here, you're
11 associated with the foundation sub-pillar.

12 Do I see that correctly?

13 A. Yes, that's correct.

14 Q. And then the label immediately under your
15 name is "Signals & Insights."

16 Did I read that right?

17 A. Yes.

18 Q. What does the phrase "Signal & Insights"
19 mean in this context?

20 A. So that was the name of our kind of
21 subteam, "Signals & Insights." And so it was a
22 small team. Myself. I think half of PM [REDACTED] and a
23 data scientist.

24 And it was an overarching team meant to
25 collect data on well-being issues that we can use to

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1 train models so we can identify them faster and kind
2 of drop them down.

3 So that was sort of the -- the "Signals" is
4 the, you know, collecting data that we use for
5 models to kind of reduce bad experiences.

6 Q. And how were you qualified to perform the
7 work you just described?

8 A. So the way -- the primary way -- one of the
9 ways in which we would collect signals is via
10 surveys. And surveys is what I've done throughout
11 my entire career.

12 Q. And I think you testified earlier that you
13 had actually served as a litigation expert on the
14 topic of survey design or survey modeling.

15 Did I recall that correctly?

16 A. Yes, that's right.

17 Q. Okay. Did you strive to perform
18 high-quality work analyzing signals and insights for
19 the Instagram well-being team?

20 A. Yes.

21 Q. Did you use your academic and professional
22 expertise as part of that work?

23 A. Yes, I did.

24 Q. Okay. Did you succeed, in your view, in
25 performing high-quality work on the topic of signals

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1 and insights within the Instagram well-being team?

2 A. Yes. It was primarily the BEEF framework
3 and -- or BEEF, which is the framework -- bad
4 experiences encounters framework, and then the BEEF
5 survey, which I thought was high quality.

6 Q. You approached that work and all other work
7 within the Instagram well-being team with rigor?

8 A. Yes.

9 Q. Competence?

10 A. Yes.

11 Q. Integrity?

12 A. Yes.

13 Q. Yes. If I direct you to a different part
14 of this welcome orientation document you have in
15 front of you, do you see there's a well-being team
16 overview at the bottom left?

17 A. Yes.

18 Q. Do you see a section titled "Our Vision"?

19 A. I do.

20 Q. It says:

21 "People come to Instagram to
22 express themselves, engage with others,
23 and be inspired."

24 Did I read that correctly?

25 A. Yes.

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1 (Exhibit 17 was marked for
2 identification and is attached to the
3 transcript.)

4 BY MR. PHELPS:

5 Q. Let me know when you have that in front of
6 you.

7 A. I have that in front of me.

8 Q. Do you recognize this document,
9 Dr. Andrews?

10 A. I do, yes. This would have been kind of
11 my -- the write-up of my performance by my boss. We
12 had earlier shown the document where I wrote my
13 performance, and this is sort of like management's
14 reply after they kind of judge everybody, I guess.

15 Q. What does "PSC" stand for in the context of
16 this document?

17 A. You would think I know that.
18 Performance -- the first P is performance, but it's
19 like your annual review.

20 Q. Can we just stipulate PSC is shorthand for
21 a review document in this context? Is that right?

22 A. Yes. Like your annual performance review.

23 Q. And was the process of drafting performance
24 reviews taken seriously at Meta, in your experience?

25 A. Yes. Very seriously.

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1 Q. And it reflects the views of your managers;
2 is that right?

3 A. This document would, yes.

4 Q. Okay. You said it's taken very seriously.
5 What do you mean by that?

6 A. Your kind of rating each half, each year,
7 directly impacts whether you get promoted, whether
8 you get a raise, that sort of thing. And so it's,
9 yeah, treated seriously.

10 Q. Okay. Do you see a section called "product
11 impact" on this review?

12 A. Yes.

13 Q. I should say, before we get into that, I
14 think you mentioned that this was prepared by
15 [REDACTED] is that right?

16 A. Yes.

17 Q. [REDACTED] was your manager at the time?

18 A. Correct.

19 Q. Okay. You see a section called "product
20 impact"?

21 A. Yes.

22 Q. It says:

23 "Your main accomplishment this
24 last half was conceiving of and
25 delivering the bad experiences

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1 encounters framework and the subsequent
2 BEEF survey."

3 Did I read that correctly?

4 A. You did.

5 Q. It further indicates:

6 "These will provide the most
7 comprehensive understanding we have at
8 IG for what issues cause bad
9 experiences for users."

10 Did I read that correctly?

11 A. Yes.

12 Q. It goes on:

13 "BEEF synthesized a variety of
14 disparate data sources from multiple
15 disciplines to identify bad experiences
16 that have been missed by TRIPS."

17 Did I read that right?

18 A. Correct.

19 Q. And then it concludes:

20 "This work has significant
21 potential and is eagerly awaited by
22 many."

23 Did I read that right?

24 A. Yes.

25 Q. Can you go to a section called "summary of

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1 MR. PHELPS: Yes. Sure.

2 I'll withdraw the last question.

3 BY MR. PHELPS:

4 Q. Dr. Andrews, I can focus you on this
5 section called "Results/Impact." In particular, the
6 second paragraph which discusses BEEF.

7 Do you see that?

8 A. I do.

9 Q. Is that consistent with the work you
10 performed on the bad experiences survey in the
11 second half of 2021?

12 A. Yes, I believe so.

13 Q. Okay. Do you have any reason to doubt that
14 this is a true and accurate reproduction of a draft
15 review of you from the second half of 2021?

16 A. No, I don't have any reason to doubt that.

17 Q. Okay. And reviews like this were
18 maintained in the ordinary course of business at
19 Meta; isn't that right?

20 A. I've never --

21 MR. HALPERIN: Object to foundation.

22 THE WITNESS: I've never been a manager so
23 I don't know; but yes, that looks -- this looks like
24 a draft that [REDACTED] made before she wrote the
25 official letter that I would have received.

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1 BY MR. PHELPS:

2 Q. This section states "Kyle's work..."
3 Do you see that?

4 A. I do.

5 Q. It says:

6 "Kyle's work in H2 is wide-ranging
7 and impactful across IG."

8 That's Instagram; right?

9 A. Yes.

10 Q. (Reading):

11 "And benefited central integrity
12 and FOA."

13 That's family of apps; right?

14 A. It is.

15 Q. (Reading):

16 "And family of app youth
17 initiatives as well."

18 Are you with me so far?

19 A. I am.

20 Q. It says:

21 "The bad experiences and
22 encounters framework, BEEF, survey that
23 he designed, managed, analyzed, and
24 evangelized was widely adopted as the
25 basis for measuring user perception of

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1 product impact and highlighting
2 specific opportunities for
3 improvement."

4 Did I read that correctly?

5 A. Yes.

6 Q. Is that consistent with your memory?

7 A. Yes.

8 Q. The first sub-bullet states:

9 "BEEF was adopted as the basis for
10 top level perception goals for
11 well-being in 2022."

12 Did I read that correctly?

13 A. You did.

14 Q. It says:

15 "BEEF provided the means to
16 operationalize user perceptions as
17 goals at the org level, a departure
18 from the traditional reliance on rater
19 prevalence, and a first for IG."

20 Did I read that correctly?

21 A. Yes.

22 Q. And is that consistent with your memory?

23 A. Yes.

24 MR. PHELPS: Let me go to the next document
25 which I think is going to be Exhibit 19.