

Exhibit 10

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 IN RE: SOCIAL MEDIA)
4 ADOLESCENT ADDICTION/) Case No.
5 PERSONAL INJURY PRODUCTS) 4:23-MD-03047-YGR
6 LIABILITY LITIGATION) MDL No. 3047
7 -----)
8 THIS DOCUMENT RELATES TO:)
9 ALL ACTIONS) CONTAINS CONFIDENTIAL
10) INFORMATION
11 -----)
12

13 COMMONWEALTH OF MASSACHUSETTS
14 SUFFOLK, ss.
15
16 COMMONWEALTH OF)
17 MASSACHUSETTS,)
18) Civil Action No.
19 Plaintiff,) 2384CV02397-BLSI
20)
21 vs.)
22)
23 META PLATFORMS, INC., and)
24 INSTAGRAM, LLC,)
25 Defendants.)

16 VIDEOTAPED DEPOSITION OF RAVI IYER, Ph.D.
17 PALO ALTO, CALIFORNIA
18 NOVEMBER 5, 2025
19 8:48 A.M.

20 Job No.: 7676515
21 Pages: 1 - 427
22 Reported by: Leslie A. Todd, CSR No. 5129 and RPR

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1 to be true. But it is not specifically part
2 of my assignment to offer that opinion.

3 Q. Okay. So this is -- but this is
4 an assumption that you're taking as true. You
5 haven't actually arrived at that opinion for
6 purposes of this case?

7 A. I have arrived at that opinion in
8 other settings, but in this case, it was not
9 my assignment to do that. I -- as I
10 understand it, there are other processes that
11 will occur, other experts who will establish
12 that. And I do believe that some of the
13 evidence in my report supports it, but it is
14 not the assignment -- it was not the goal of
15 my report.

16 Q. So let's get back to what you
17 meant by many young users.

18 A. Yeah.

19 Q. So am I right that you're
20 defining many as an unacceptably large number?

21 MS. O'NEILL: Objection. Form.
22 Mischaracterizes the testimony.

23 THE WITNESS: That I would say is
24 a -- I mean, yeah, I guess I would say
25 that I -- at least -- I mean, again,

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1 A. Yep.

2 Q. Do you see that?

3 A. I do see that.

4 Q. What do you mean by sufficiently?

5 A. So 45 percent of teens report
6 that social media affects their sleep. A
7 sufficient remedy would be commensurate with
8 that kind of harm. You would actually see --
9 it would actually -- you know, the amount of
10 harm we would see would drop precipitously.
11 And so what kinds of remedy would actually
12 reduce those numbers to, you know,
13 dramatically or effectively --

14 Q. Okay. And your opinion is that
15 Meta's safety tools and features do not
16 sufficiently remedy the unwanted, harmful, and
17 negative experiences associated with the
18 platforms, right?

19 A. Meta's safety tools and features
20 for the reasons I've outlined in the report?

21 Q. Yeah.

22 A. The scale of their usage is quite
23 low. Very few people use them. Not that many
24 people know about them. They rely on
25 willpower of teens who -- the ones who need it

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1 BY MR. KENNEDY:

2 Q. Well, you didn't form any
3 opinions in these cases concerning what would
4 constitute a sufficient remedy for the
5 unwanted, harmful, and negative experiences,
6 correct?

7 MS. O'NEILL: Objection. Form.

8 THE WITNESS: So I did form
9 opinions about what would be a
10 sufficient remedy. I talked about very
11 specific design changes that I thought
12 would be necessary to at least do -- you
13 know, to -- to change the product,
14 commensurate with the harms that teens
15 are reporting.

16 BY MR. KENNEDY:

17 Q. And your reports don't contain
18 any data of any kind concerning by how much
19 would your proposed design changes reduce the
20 incidence of unwanted, harmful, and negative
21 experiences, correct?

22 A. My report does not provide an
23 exact quantitative estimate of how the
24 combination of changes that I recommend would,
25 in aggregate, reduce these unwanted harmful

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1 Foundation.

2 THE WITNESS: I would agree that
3 Meta has many -- has made many changes
4 to its platform with the intention of
5 improving the experience of teen users.

6 BY MR. KENNEDY:

7 Q. And I understand you go into them
8 in some detail in the reports, right?

9 A. I do talk about those features,
10 and where they are not sufficient to mitigate
11 the harms that excessive --

12 Q. Yeah, your opinion is the things
13 that Meta has already tried to improve the
14 experience of teens and reduce any unwanted,
15 negative, and harmful experiences they have,
16 those measures are insufficient to mitigate
17 the issues you identify in your reports,
18 correct?

19 A. Yes, they are insufficient to
20 mitigate the harms in the report, for the
21 reasons I identify in the report, that they --
22 there are theoretical reasons, but based on
23 the fact that they rely on teens' willpower,
24 there are reasons just based on looking at the
25 usage of these things, they are not used very

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1 much compared to the harms. And then there's
2 also evidence that these things are not
3 well-maintained, and don't even work when --
4 as advertised.

5 Q. So, in short, in your opinion,
6 the efforts Meta has already made to reduce
7 any unwanted, negative, and harmful
8 experiences teens might have on their
9 platforms aren't good enough?

10 MS. O'NEILL: Objection. Form.
11 BY MR. KENNEDY:

12 Q. Correct?

13 A. The efforts that they have made
14 are insufficient to address the harm, for a
15 variety of reasons that I outlined.

16 Q. Now, let's say Meta reviewed your
17 reports, and wanted to test all of the design
18 changes that you propose, to see if they would
19 be sufficient to mitigate unwanted, negative,
20 and harmful experiences teens have on their
21 platforms.

22 A. Yeah.

23 Q. Your reports provide no metric
24 from which Meta could assess whether your
25 design changes are or are not sufficient to

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1 mitigate these experiences, correct?

2 MS. O'NEILL: Objection. Form.

3 THE WITNESS: I -- again, I think

4 I answered that, that the report

5 includes a variety of ways to measure

6 unwanted, harmful, negative experiences.

7 Again, I include the BEEF survey,

8 the surveys of people's over-usage of

9 the platform, where they say they're

10 having unwanted -- using it too much,

11 and negative experiences, harmful

12 experiences. It's affecting their

13 sleep. It's affecting their

14 productivity.

15 I think there's an evolving

16 methodology about how to measure that,

17 that is referred to in the report. And

18 I think the report at least provides a

19 starting point for measuring those --

20 the effects in that experiment that you

21 describe.

22 BY MR. KENNEDY:

23 Q. What would be a metric by which

24 you would measure the level of mitigation in

25 the context of the design changes you're

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1 different way. What -- how do you -- I mean,
2 how do you define the term "sufficient to
3 mitigate" in the context of your opinions?

4 A. So sufficient has to be
5 commensurate with the harms that are being --
6 and it has to -- so I talk about why the teen
7 accounts are insufficient.

8 And so I think they -- the people
9 who use the settings that are available on
10 Meta's systems are often those with the most
11 willpower, right? So they don't address the
12 people who need it most. They often --
13 they're just not used very much, right? So
14 the level that they're used versus the level
15 that -- that -- of harm we're seeing is so
16 disparate, that it couldn't possibly affect --
17 like, if only a small percentage of users are
18 using -- are hiding like counts, then how
19 could a -- how could an intervention which
20 allows users to hide their like counts
21 actually materially affect the harms of
22 quantification of engagement.

23 So the -- so it has to be
24 commensurate with the -- it has to be able to
25 help the people who need it most. It has to

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1 be used to some degree that it is commensurate
2 with the harms. And it has to -- I mean, and
3 then third, like, both in independent testing
4 and, you know, my own use of these products,
5 these products -- these tools and settings are
6 not well-maintained, and they don't work
7 exactly as advertised.

8 So therefore, it has to at least
9 be possible -- these -- you know, sufficient
10 at least means it has to be commensurate with
11 the harm, be usable by the people who need it
12 most, and be well-maintained and consistently
13 work as advertised.

14 Q. So sitting here today, you have
15 no quantitative metric to offer to define what
16 constitutes sufficient mitigation of unwanted,
17 negative, and harmful experiences on Meta's
18 platforms, correct?

19 MS. O'NEILL: Objection. Form.

20 THE WITNESS: I would not say
21 that's correct. I would say that I've
22 offered a metric that one can use to --
23 I've offered a bunch of specific metrics
24 that I think a product manager could
25 easily use to measure the effects of

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1 these changes. I've given you several
2 criteria for why the teen accounts are
3 not sufficient in their current state.

4 And so I think -- you know, I
5 decline to speculate as to the exact
6 number, but I think I've given you a
7 very easy -- a very readily usable
8 metric that one can use to understand
9 the effects and criteria for
10 understanding sufficiency.

11 BY MR. KENNEDY:

12 Q. Okay. So what is -- and you can
13 look at your reports, if you'd like.

14 A. Yeah.

15 Q. What is a number that you have
16 offered in your reports that would help Meta
17 or anyone else define what constitutes
18 sufficient mitigation of unwanted, negative,
19 and harmful experiences? Just give me a
20 number.

21 MS. O'NEILL: Objection. Form.

22 THE WITNESS: I think

23 I've repeatedly declined to give you an
24 exact number. I think it's not -- I
25 think giving you an exact number, off

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1 Q. All right. So let's say Meta did
2 want to do it. Meta takes your reports, and
3 follows your recommendations in the report,
4 you know, changes what they need to change on
5 each of the two platforms, and then does a
6 survey of teen users to find out -- find out
7 what happens, how would Meta know whether your
8 changes worked or not?

9 MS. O'NEILL: Objection.
10 Speculation.

11 THE WITNESS: Again, I have
12 outlined many metrics that one can use
13 for understanding unwanted, harmful,
14 negative experiences. Meta itself has
15 not used -- the BEEF survey is a very
16 good metric that they could use to
17 understand these -- they have experience
18 doing that.

19 There are also many people who
20 have adapted those measures in other
21 contexts and improved upon them. There
22 are new constructs that people have
23 started to measure, including things
24 like problematic use. Meta itself has
25 had definitions of problematic use.

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1 Somewhere between its definition
2 and measures of that, and, you know,
3 Pew's definition, there is room to -- so
4 there are many metrics that one could
5 use to measure these. They all are
6 starting to converge. You know, they're
7 not exactly the same, but they all are
8 part of a limited universe of harms that
9 we're consistently observing on these
10 platforms across -- across situations
11 and across time.

12 And I think that would be
13 perfectly reasonable for them to
14 understand the effects of enacting these
15 design changes.

16 BY MR. KENNEDY:

17 Q. Okay. So, yeah, I -- all I'm
18 looking for is, how -- like, what -- like,
19 what level of incidence of unwanted, negative,
20 and harmful experiences are you looking for as
21 constituting sufficient mitigation of the
22 problems you are assuming are occurring today
23 on Facebook and Instagram?

24 MS. O'NEILL: Objection. Asked
25 and answered.

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1 THE WITNESS: So I think, again,
2 I -- I think it sounds like you're
3 trying to ask me to give an exact number
4 of what level to expect. And I think
5 I'm repeating myself by saying that it
6 would require a lot of thought. That
7 was not -- the exercise of the report
8 was not to come up with an exact number.

9 And so if you are looking for an
10 exact number, it's something I have to
11 think about a lot deeper. And it would
12 be, you know, very speculative of me to
13 venture an exact number at this moment.

14 BY MR. KENNEDY:

15 Q. So if Meta were to adopt and
16 implement all of your design changes, there's
17 no metric by which Meta could assess whether
18 those changes have succeeded or failed,
19 correct?

20 A. Again, I would, again, suggest
21 that I've talked about many metrics that they
22 could use to understand whether they have
23 succeeded or failed, including the Pew
24 metrics, the BEEF metrics, the -- Snap's
25 Digital Wellbeing Index metrics, eSafety's

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1 metrics, Ofcom's metrics. There are many
2 metrics that all converge on various harms
3 that they could use.

4 And so I -- you know, I'm not --
5 I'm declining to speculate on an exact number,
6 because I think that would be very
7 speculative, but there are many metrics that
8 they could use.

9 Q. Can you explain what you mean by
10 Pew metrics?

11 A. I mean, there are survey
12 questions that Pew has asked about -- that one
13 could use to measure the effects of their
14 products.

15 Q. Could you give an example of one
16 of those questions?

17 A. You know, I don't know the exact
18 wording of the question, without seeing it.
19 If you have it, you're welcome to give it to
20 me. But, you know, something like, you know,
21 Do you use social media too little, too much,
22 or just enough is one. Does social media
23 affect your sleep is another -- that's
24 conceptually -- I don't know the exact
25 wording.

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1 Q. Yeah. Conceptually is fine for
2 right now. So -- and these are survey
3 questions asked of teen users of social media,
4 right?

5 A. They're asked of teen users, I
6 think, in general. But, yeah, a
7 representative sample of teens in the United
8 States.

9 Q. Okay. So if only 2 percent of
10 teens say they use social media too much --
11 strike that.

12 So if you gave this question to
13 users of Facebook and Instagram, and only
14 2 percent of teens say they feel like they use
15 Facebook or Instagram too much, is that good,
16 is that acceptable?

17 MS. O'NEILL: Objection.

18 Speculation. Incomplete hypothetical.

19 THE WITNESS: Well, I would say
20 that 2 percent is certainly better than
21 45 percent. I don't -- again, I think
22 you're -- you know, I -- there's so much
23 speculation, in terms of, like, me
24 figuring out, like, what -- you know,
25 trying to pin down an exact number.

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1 platforms should be changed to avoid the harms
2 for which plaintiffs are seeking to hold Meta
3 liable, correct?

4 MS. O'NEILL: Objection. Form.

5 THE WITNESS: I have made many
6 design recommendations about how Meta
7 can remedy the issues associated with
8 extended use features, quantification of
9 engagement, and all these -- the harms
10 on the platform.

11 BY MR. KENNEDY:

12 Q. And isn't it only fair that you
13 also give Meta a benchmark by which it can
14 figure out whether your proposed changes
15 actually avoid the harm for which plaintiffs
16 are trying to hold Meta liable?

17 MS. O'NEILL: Objection. Form.

18 THE WITNESS: I don't know if I
19 can -- you know, it's kind of
20 speculative for me to say what is fair
21 or not fair. It was not part of my
22 exercise for me to come up with an exact
23 number.

24 You know, I -- I can, off the top
25 of my head, come up with some general

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1 ideas about what is or is not
2 sufficient. Certainly, you know, when a
3 feature is only used by 1 percent of the
4 population, and the harm is represented
5 by, you know, 45 percent of the
6 population or 20 percent of the
7 population, then clearly, there's a
8 mismatch, in terms of scale there.

9 And I pointed that out in the
10 report, so I think there are some --
11 some judgments about magnitude that one
12 can make. But it was not part of my
13 report. It was not part of the goals of
14 my report in writing it, to come up with
15 an exact number.

16 I don't think that's impossible.
17 I think there's a world where, if Meta
18 want to engage in these design changes,
19 where one could work with them to
20 develop such a metric. You know, we
21 could work with them on metrics, and try
22 to -- try to understand what is
23 possible.

24 BY MR. KENNEDY:

25 Q. Sitting here today, you haven't

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1 developed any such -- any of those metrics,
2 right?

3 MS. O'NEILL: Objection. Form.

4 THE WITNESS: Again, I -- I mean,
5 I will, again, point out the BEEF
6 metrics, the Snap metrics, the Pew
7 metrics, and all those metrics.

8 Q. Okay, so --

9 MS. O'NEILL: Counsel, please let
10 him finish the answer.

11 THE WITNESS: So I do think that
12 there are many metrics that one -- that
13 Meta could use in order to measure --
14 you know, an exact number is very
15 different than a metric.

16 BY MR. KENNEDY:

17 Q. But you haven't proposed any
18 particular metric that would constitute
19 mitigating these harms to your satisfaction?

20 MS. O'NEILL: Objection. Asked
21 and answered.

22 THE WITNESS: I think you're
23 using the term metric and exact number
24 interchangeably. And I don't think
25 that's -- you know, I proposed many

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1 concrete metrics. I have not proposed
2 an exact number. That was not the goal
3 of the report.

4 BY MR. KENNEDY:

5 Q. Okay. So how do you define the
6 term metric?

7 A. A metric is a measure or
8 something that you can use to understand
9 progress.

10 Q. So why don't we just use the term
11 measure.

12 A. Okay.

13 Q. So, like, you -- when I've asked
14 for metrics, you throw out, like, the Pew
15 metric, the BEEF metric, Digital Wellbeing
16 Index, and eSafety metric. And so let's just
17 call them measures.

18 A. Okay.

19 Q. How would Meta follow the BEEF
20 measure to determine whether it has made
21 design changes that sufficiently mitigate the
22 unwanted, negative, and harmful experiences?
23 How would Meta use that -- the BEEF measure?

24 A. Yeah, I think they could use it
25 in several ways, which I believe they may have

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1 done in some cases, likely. So, one, they
2 could measure it before and after. So, like,
3 sort of a pre/post design. So before, this
4 was the level of harm. After, what is the
5 level of harm?

6 The other way to do is
7 experimentally. So you can understand -- you
8 can implement the changes for a small group of
9 users, and then see what that change -- you
10 know, what is the effect on the experience of
11 that group of users versus the effect of users
12 who didn't get that change, or you can do a
13 holdout, where you can do it in reverse,
14 right? You give everyone this change, but
15 there's a small group that don't get the
16 change, and you compare the two groups.

17 And you want do it over time,
18 because you also want to look at network
19 effects, because, like, some of these things
20 may not happen immediately. But there's lots
21 of established methods for using these metrics
22 to establish the effects of the design changes
23 on the platform.

24 Q. So do you agree that it would be
25 necessary to do one or more of these

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1 you draw the line between an article that is
2 related to the subject matter of this case
3 versus unrelated.

4 MS. O'NEILL: Objection. Form.
5 Mischaracterizes the report.

6 THE WITNESS: So in that
7 paragraph, I'm also -- I'm talking about
8 my methodology about how you use
9 evidence to answer questions which
10 identifying specific questions -- which,
11 candidly, Dr. Birnholtz misidentified
12 the questions I was identifying in the
13 report and rebutting mine -- you know,
14 identifying specific questions,
15 identifying evidence, using varieties of
16 sources of evidence, empir- --
17 experimental evidence, observational
18 evidence, not limiting yourself to one
19 type of evidence, is a -- a method that
20 is common to many of the empirical
21 publications that are on my page. And
22 so the methodology is common to the
23 methodology I used in this report.
24 The -- so that was the subject of the
25 15,000 number.

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1 I also would say that
2 understanding people's aspirations is
3 relevant to social media, in part,
4 because many people -- you know, a lot
5 of the report is about people's unwanted
6 experiences. And so understanding what
7 people want and what makes something
8 unwanted is key to addressing unwanted
9 experiences.

10 BY MR. KENNEDY:

11 Q. What about -- so your position is
12 your most cited two articles are related to
13 the subject matter of this litigation?

14 A. I would say that they have some
15 relation to the subject matter of this
16 litigation. And moreover, I would say that
17 they are articles which share a common
18 methodology which I employed in the report.

19 Q. What is the common methodology?

20 A. The common methodology is
21 identifying a set of questions, identifying
22 the best evidence to answer those questions,
23 reviewing that evidence, not limiting one's
24 self to specific kinds of evidence, but -- but
25 considering both experimental evidence,

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1 report.

2 Q. So you said they were helpful
3 with many things. Other than formatting, what
4 were those other things they were helpful
5 with?

6 A. Editing; understanding the
7 process; understanding, like, what needed to
8 go into the report. Like, I didn't know,
9 like, the format of, like, summary of opinions
10 and, you know, just generally the -- not just
11 formatting of the report but, like, of, like,
12 the structure of a -- an expert opinion. And
13 then, you know, like, a -- you know,
14 citations; you know, understanding what -- the
15 formatting of citations; keeping track of the
16 citations; putting them into the -- you know,
17 some of the materials that were provided.

18 Q. But you didn't -- in connection
19 with forming your opinions in this case, you
20 never did a systematic review of any corpus of
21 literature related to social media or teen
22 mental health, correct?

23 MS. O'NEILL: Objection. Form.

24 THE WITNESS: So I didn't -- I
25 have -- so I've had -- long before I

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1 engaged in this report, I've had -- I've
2 written about, studied, done research on
3 the effects of social media and the
4 design of social media on youth. And so
5 I've -- I have extensive knowledge of
6 the literature, and I've reviewed the
7 literature many times, both things that
8 are positive and negative related to my
9 report. I included the citations in my
10 report that were most relevant to the
11 opinions that I gave, and -- yeah.

12 BY MR. KENNEDY:

13 Q. Are you familiar with the term
14 "systematic review"?

15 A. I am familiar with the term
16 "systematic review."

17 Q. What -- what does "systematic
18 review" mean?

19 A. To review things in a enumerated
20 way that you have a system for.

21 Q. That -- systematic review
22 involves having in mind a particular question
23 you're investigating in the literature before
24 you start the review?

25 MS. O'NEILL: Objection. Form.

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1 that -- being yelled at. So it's
2 not -- negative experiences have far
3 lasting impacts than positive
4 experiences.

5 BY MR. KENNEDY:

6 Q. So I just want to make sure I
7 understand. So is it fair to say the goal of
8 your proposed changes to the algorithms --
9 strike that.

10 It's fair to say that the goal of
11 your proposed changes to Meta's platforms is to
12 mitigate unwanted, negative, and harmful
13 experiences in young users?

14 A. It is fair to say that that
15 is -- you know, including -- including
16 excessive usage, that is the goal of the
17 design changes that I propose.

18 Q. Now, do you assess the success of
19 the mitigation at a population level or an
20 individual level?

21 MS. O'NEILL: Objection. Form.

22 THE WITNESS: At a population
23 level or at the individual level? I
24 mean, I think you can assess it at
25 both depending on the harm. I think

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1 that a lot of the metrics that I
2 suggest are population level metrics,
3 and so I think that would often be how
4 you would assess things. But there
5 are certain acute harms that I think
6 you'd also want to consider at the
7 individual level.

8 BY MR. KENNEDY:

9 Q. So -- so let's say Meta
10 implements your proposed changes to Facebook.
11 And after the changes are implemented, you find
12 out that nine users are having safe and
13 positive, good experiences, and one user is
14 suffering severe mental health problems from
15 using Facebook, have you successfully mitigated
16 unwanted, negative, and harmful experiences
17 within the meaning of your reports?

18 MS. O'NEILL: Objection.
19 Speculation. Incomplete hypothetical.

20 THE WITNESS: Yeah, I think
21 that would be very hard for me to
22 speculate with incomplete information
23 about the exact line where you would
24 draw.

25 I would point out that one out

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1 doing all of your proposed changes at the same
2 time would be sufficient or effective
3 mitigation is -- is a prediction on your part,
4 right?

5 MS. O'NEILL: Objection. Form.

6 THE WITNESS: It is based on
7 the evidence that I cite in the report
8 that these features all individually
9 have effects on mitigating unwanted,
10 harmful experiences, and the fact that
11 those -- these features all operate on
12 similar mechanisms that extend usage
13 of a platform which is one of the most
14 common negative, harmful experiences
15 on the platform.

16 BY MR. KENNEDY:

17 Q. No, I understand you have a basis
18 for your prediction that doing all of your
19 proposed changes would work. All I'm saying,
20 it's still a prediction, right --

21 MS. O'NEILL: Objection.

22 BY MR. KENNEDY:

23 Q. -- that your doing all of your
24 proposed changes would be effective mitigation?

25 MS. O'NEILL: Objection. Form.

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1 Q. All right. So the -- at a high
2 level, the point of this paragraph is that you
3 assert that it would be feasible for Meta to
4 get rid of autoplay and infinite scroll. Is
5 that a fair high-level summary of this
6 paragraph?

7 A. That is a fair high-level
8 summary of this paragraph.

9 Q. Now, you go on to say, quote,
10 "Infinite scroll and autoplay can readily be
11 removed, and many successful companies have
12 done so, proving the feasibility."

13 And you give two examples in this
14 paragraph, that YouTube turned off autoplay for
15 identified children and Google removed infinite
16 scroll from search results.

17 Are there any other companies
18 you're thinking of as examples of -- successful
19 companies that have removed infinite scroll and
20 autoplay, aside from YouTube and Google?

21 A. I mean, Facebook -- I believe
22 Instagram has the setting to -- have settings
23 to also disable autoplay. They just aren't
24 turned on by default, and so very few people
25 use them.

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1 make it an option, and you think it should be a
2 default?

3 MS. O'NEILL: Objection. Form.

4 THE WITNESS: I believe it
5 should be off for young users, and not
6 be something they can turn back on at
7 all.

8 BY MR. KENNEDY:

9 Q. Okay. But you agree young users
10 on Facebook already have the option to turn it
11 off, right?

12 A. I believe so, yes. Assuming it
13 works.

14 Q. Have you cited in your reports
15 any research demonstrating whether and to what
16 extent having a default setting of a feature is
17 more efficacious than having it as an opt-in
18 setting for young users?

19 A. So it -- that is wide-spread
20 industry knowledge. It is also cited in the
21 non-engagement paper that I cite when I talk
22 about non-defaulted settings are used well
23 under 10 percent, and that's just not my
24 knowledge but that's knowledge of many --
25 people across many companies.

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1 I also cite many of the stats
2 from Meta itself about the usage of many of
3 their non-defaulted features which are often
4 quite low.

5 Q. So is it your opinion that all
6 Instagram users are negatively impacted by
7 seeing "like" counts? Let me change the
8 question.

9 Is it your opinion that all young
10 users of Instagram are negatively impacted by
11 seeing "like" counts?

12 MS. O'NEILL: Objection. Form.

13 THE WITNESS: I would not say
14 that it is a hundred percent of teen
15 users who are negatively impacted by
16 seeing "like" counts. I would say
17 that it is certainly a widespread
18 experience whether by the BEEF survey
19 or Project Daisy, we know that a large
20 percentage of users regularly
21 experience negative social comparison,
22 that users attribute it to the
23 visibility of "like" counts. And so
24 it may not be a hundred percent of
25 users, but it's certainly a large