

EXHIBIT 11

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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.)

18 VIDEOTAPED DEPOSITION OF RAVI IYER, Ph.D.
19 PALO ALTO, CALIFORNIA
20 NOVEMBER 5, 2025
21 8:48 A.M.

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

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1 I -- so, I mean, I've had -- I
2 have long-established opinions in this
3 case, and so I knew which articles
4 would be most relevant to those
5 opinions, and I used those.

6 BY MR. KENNEDY:

7 Q. Let me ask the same questions
8 about the category of books and academic
9 papers, A.2.

10 A. Yeah.

11 Q. How did you arrive at the --
12 selecting the list of books and academic papers
13 in your materials considered list?

14 A. So, again, I did some number of
15 searches on the design features. I had a
16 research assistant also do some number of
17 searches for these specific design features,
18 just understanding the effects of these design
19 features, in general.

20 And then I also relied on my
21 longstanding knowledge of the field and -- and
22 relevant articles.

23 Q. Okay. You didn't consider any
24 books or academic papers inconsistent with your
25 opinions in this case?

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1 MS. O'NEILL: Objection. Form.

2 THE WITNESS: So, again, I'm
3 familiar with many books and academic
4 papers that are inconsistent with my
5 opinions, because they're a part of me
6 having developed those opinions over a
7 long period of time. I did not
8 specifically consider them for this
9 case, but they're certainly part --
10 inform my opinions.

11 BY MR. KENNEDY:

12 Q. Okay. Let's go back to your CV
13 just as a reference. I just want to ask you a
14 few questions about Ranker.

15 A. Okay.

16 Q. Now, it's page -- it's the --

17 A. Yep.

18 Q. -- I guess, second page of your
19 CV.

20 A. Yep.

21 Q. So you are a co-founder of
22 Ranker?

23 A. Yes. I was there when it first
24 started. I was part time, so -- I was also
25 working as an academic, and so, you know, I

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CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

The undersigned Certified Shorthand Reporter
does hereby certify:

That the foregoing proceeding was taken
before me at the place and time therein set forth,
at which time the witness was duly sworn; That the
testimony of the witness and all objections made at
the time of the examination were recorded
stenographically by me and were thereafter
transcribed, said transcript being a true and
correct copy of my shorthand notes thereof; That
the dismantling of the original transcript will
void the reporter's certificate.

In witness thereof, I have subscribed
my name this date: November 6, 2025.

A handwritten signature in blue ink that reads "Leslie Anne Todd". The signature is written in a cursive style and is positioned above a horizontal line.

LESLIE A. TODD, CSR, RPR
Certificate No. 5129

(The foregoing certification of
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