

EXHIBIT A

CONFIDENTIAL

Page 1

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)
_____)

COMMONWEALTH OF MASSACHUSETTS
SUFFOLK, ss SUPERIOR COURT

COMMONWEALTH OF MASSACHUSETTS,
Plaintiff, CIVIL ACTION NO.
2384CV02397-BLS1

v.
META PLATFORMS, INC. and
INSTAGRAM, LLC.

Defendants.

Monday, March 2, 2026

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Video-Recorded Oral Deposition of CARL
S. SABA held at the offices of Davis Polk &
Wardwell LLP, 900 Middlefield Road, Redwood
City, California, commencing at 9:03 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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CONFIDENTIAL

Page 21

1 Q. Other than the mistake
2 addressed in that supplement, are there any
3 other mistakes in your reports that you have
4 discovered?

5 A. Not that I'm aware of, no.

6 Q. In arriving at the opinions set
7 forth in your reports, you were asked by
8 counsel to make a number of assumptions,
9 correct?

10 A. There are some assumptions I
11 was asked to make, yes.

12 Q. And those assumptions are
13 identified in your reports, correct?

14 A. Correct.

15 Q. You didn't make any assumptions
16 other than those specifically identified in
17 your report, correct?

18 A. Correct. I mean, if you're
19 referring specifically to assumptions that I
20 was asked to make as opposed to assumptions I
21 decided to make as part of my calculations
22 and professional judgment, I don't know
23 what -- if you could just clarify your
24 question, please.

25 Q. To the extent counsel asked you

CONFIDENTIAL

Page 22

1 to make an assumption, you've identified it
2 in your report, correct?

3 A. Yes.

4 Q. And counsel didn't ask you to
5 make any assumptions other than those you
6 identified in your report?

7 A. I believe that's correct, yes.

8 Q. And by assumptions, do you
9 understand that to mean factual propositions
10 that counsel asked you to assume are true?

11 MS. ARORA: Objection to form.

12 A. I think that would be true,
13 yes.

14 BY MR. WILLIAMS:

15 Q. Do any -- sorry.

16 A. Go ahead.

17 Q. Do any of the assumptions that
18 the AGs asked you to make concern methodology
19 that you apply rather than factual
20 assumptions?

21 A. I don't believe so.

22 Q. In your view, is it proper for
23 an expert to be asked by counsel to make
24 assumptions as to what methodology to apply?

25 MS. ARORA: Objection to form.

CONFIDENTIAL

Page 23

1 A. I think it depends on the
2 circumstances, but, generally speaking, the
3 expert determines the methodology, and I
4 believe that that is the case here.

5 BY MR. WILLIAMS:

6 Q. So in your view, it's not
7 proper for counsel to direct an expert to
8 apply a particular methodology?

9 MS. ARORA: Objection, asked
10 and answered.

11 A. I think, again, it would depend
12 on circumstances, but I would say that would
13 not be typical.

14 BY MR. WILLIAMS:

15 Q. Or appropriate?

16 MS. ARORA: Objection to form.

17 A. I'm not going to -- I'm not
18 going to agree to "appropriate" because there
19 may be some circumstances where maybe it is
20 appropriate.

21 BY MR. WILLIAMS:

22 Q. So in some circumstances,
23 counsel -- strike that.

24 In some circumstances, it is
25 appropriate for counsel to direct an expert

CONFIDENTIAL

Page 24

1 what -- to apply a certain methodology?

2 MS. ARORA: Objection to form.

3 A. I would say it may be. It
4 really depends on a specific circumstance.

5 BY MR. WILLIAMS:

6 Q. For certain assumptions, you
7 made an effort to assess the reasonableness
8 of the assumption, correct?

9 A. That's correct.

10 Q. And what do you mean when you
11 say that -- or conclude that an assumption is
12 reasonable?

13 A. It means that I've reviewed
14 supporting evidence and the evidence supports
15 that assumption.

16 Q. When you say supports, what do
17 you mean?

18 A. I'm not sure how to frame it
19 any other way. If there was a particular
20 assumption I was asked to make and I've
21 conducted some analysis to see whether there
22 is support for that assumption and I describe
23 it in my report, that's what I mean.

24 Q. Well, are you -- strike that.
25 What quantum of support do you

CONFIDENTIAL

Page 25

1 have in mind?

2 MS. ARORA: Objection to form.

3 A. I mean, we're discussing this
4 in broad generalities, which makes it very
5 difficult for me to answer. We'd have to
6 look at a specific example.

7 BY MR. WILLIAMS:

8 Q. Fair enough. And we will.

9 I'm just trying to understand
10 generally your approach, which is are you
11 concluding that there's some basis in the
12 record to support the assumption or are you
13 reaching an opinion beyond that?

14 MS. ARORA: Objection to form.

15 A. I'm concluding that there is
16 some factual basis in the record to support
17 that assumption, yes.

18 BY MR. WILLIAMS:

19 Q. But you're not necessarily
20 concluding that the evidence shows that the
21 assumption is more likely than not, for
22 example?

23 MS. ARORA: Objection to form.

24 A. I mean, I may be providing
25 evidence that it's more likely than not, I

CONFIDENTIAL

Page 26

1 would say.

2 BY MR. WILLIAMS:

3 Q. Well, if you're asked to assume
4 causation, for example, are you -- and you
5 conclude that that's a reasonable assumption,
6 are you concluding that it's more likely than
7 not that causation has been met or just that
8 there's some basis to conclude that causation
9 has been met?

10 MS. ARORA: Objection to form.

11 A. I would say it's the latter,
12 that there's some basis to support the
13 assertions of causation.

14 BY MR. WILLIAMS:

15 Q. Your reports in both matters
16 include an appendix listing all of the
17 documents and information that you considered
18 in forming your opinions, correct?

19 A. That's correct.

20 Q. And those appendices are a
21 complete and accurate list of all of the
22 documents and information you considered in
23 forming your opinions, correct?

24 A. That's correct.

25 Q. There are no documents or

CONFIDENTIAL

Page 27

1 information that you considered other than
2 what's listed in those appendices, correct?

3 A. None that I'm aware of.

4 Q. Let's go to Appendix -- let's
5 go to your opening report and flip to
6 Appendix B.

7 So this appendix, I'll
8 represent, is 45 pages -- is approximately 45
9 pages long. Does that sound about right?

10 A. Yes, that sounds about right.

11 Q. And it lists various documents,
12 correct?

13 A. That's correct.

14 Q. Did you personally review all
15 of the documents listed in this appendix?

16 A. I would say I've reviewed, if
17 not all of them, the majority of them, some
18 more -- some significantly more than others.
19 Those would be the ones I placed primary
20 reliance on.

21 Q. So some of the documents listed
22 here, you did not personally review, correct?

23 A. I just -- I don't know. I
24 would have to look at every document and tell
25 you.

CONFIDENTIAL

Page 31

1 correct?

2 A. What do you mean by that?

3 Q. Well, why don't we go to your
4 reply report --

5 MS. ARORA: Before we move on
6 from this document, Counsel, and I
7 apologize for interrupting, I do want
8 to just note for the record, there is
9 an amendment to this Appendix B, and
10 what we've been discussing on the
11 record now is not the amended version
12 or the revised version of Appendix B.
13 It's the original version. I just
14 want to make sure you're aware of
15 that.

16 MR. WILLIAMS: Okay. Thank you
17 for noting.

18 BY MR. WILLIAMS:

19 Q. Looking at your reply report --
20 I'm sorry.

21 I just realized your -- what
22 I've been calling your reply report is, on
23 the cover page, called your rebuttal trial
24 report; is that correct?

25 A. That's correct, it is -- I

CONFIDENTIAL

Page 32

1 believe that's the way it was designated by
2 the Court, but it is a reply report. It's a
3 reply to McCrary and to Isaacson.

4 Q. So if I use the term "reply,"
5 you understand that I'm referring to this
6 report, correct?

7 A. Yes, I do.

8 Q. So if we turn to Appendix D of
9 your reply report, which is much shorter --

10 A. Okay.

11 Q. -- under the Research Materials
12 section, there are four treatises, correct?

13 A. Yes.

14 Q. And you didn't list these
15 treatises in your appendix to your opening
16 report, correct?

17 A. That is correct.

18 Q. Does that mean you didn't
19 consider these treatises in connection with
20 forming your opinions in your opening report?

21 A. I would say it means that I
22 didn't consider them explicitly. I mean, I'm
23 intimately familiar with these publications.
24 This is guidance that I have taken into
25 account for many years.

CONFIDENTIAL

Page 33

1 Q. And so you're familiar with the
2 contents of these treatises, correct?

3 A. Yes.

4 Q. And when you say it's guidance
5 you've taken into account for many years,
6 what do you mean by that?

7 A. What I mean, for example, is
8 that whenever I prepare these types of
9 calculations as the ones that I prepared in
10 my report, I take into account reasonable
11 certainty guidance.

12 So just because I didn't cite
13 it in my opening report doesn't mean that I
14 didn't attempt to follow that guidance.

15 Q. Okay. When you say reasonable
16 certainty guidance, you're referring to a
17 specific portion of one of the treatises; is
18 that correct?

19 A. Calculating the lost profits
20 discusses the topic, attaining the reasonable
21 certainties is focused entirely on that
22 topic, and I believe the remaining two
23 publications also have some reference to this
24 concept of reasonable certainty.

25 Q. These are treatises that you

CONFIDENTIAL

Page 34

1 view as authoritative in the field; is that
2 fair?

3 MS. ARORA: Objection to form.

4 A. I believe they apply or they --
5 they discuss guidance that is widely used in
6 my field.

7 BY MR. WILLIAMS:

8 Q. And you've used them?

9 A. Yes.

10 Q. Did you have access to the full
11 record of documents produced in both
12 litigations?

13 A. My understanding is that I did
14 based on our access to Everlaw.

15 Q. And what is Everlaw?

16 A. A database or a portal that I
17 understand contained all documents that were
18 produced by either party in this litigation.

19 Q. And did you personally have
20 access to Everlaw?

21 A. We had an associate on our --
22 on my team who had access to Everlaw. Meta
23 wanted to restrict access to one person.

24 Q. And so if a document was
25 produced in this litigation, you had access

CONFIDENTIAL

Page 70

1 MS. ARORA: Objection to form.

2 A. I understand the general
3 elements. I wouldn't say the specifics of
4 every state.

5 BY MR. WILLIAMS:

6 Q. And what is your understanding
7 of the general elements?

8 A. Engaging in unfair practices
9 that may lead to or could be reasonably
10 expected to lead to harm and engaging in
11 deceptive practices that deceive the
12 reasonable consumer.

13 Q. For the unfair practices
14 claims, is it your understanding that the
15 harm must be caused by the unfair practices?

16 MS. ARORA: Objection to form.

17 MR. BERGE: Objection to form.

18 A. My understanding is that harm
19 does not actually have to occur for there to
20 be an unfair practice.

21 BY MR. WILLIAMS:

22 Q. So you said that your
23 understanding of the unfair practices claims
24 was that it involved engaging in unfair
25 practices that may lead to or could be

CONFIDENTIAL

Page 71

1 reasonably expected to lead to harm, correct?

2 A. Correct.

3 Q. And is it your understanding,
4 generally speaking, that there is any
5 required causal connection between the unfair
6 practices and the actual or likely harm?

7 MS. ARORA: Objection to form.

8 A. Well, yes, in the sense that
9 the practice has to be -- may be expected to
10 lead to harm.

11 BY MR. WILLIAMS:

12 Q. An expectation of harm caused
13 by the unfair practice, right?

14 MS. ARORA: Objection to form.

15 MR. BERGE: Objection.

16 A. That's my understanding.

17 BY MR. WILLIAMS:

18 Q. Is it your understanding that
19 the violations that -- what constitutes a
20 violation under the state consumer
21 protections must be caused by the alleged
22 misconduct?

23 MS. ARORA: Objection to form.

24 MR. BERGE: Objection to form.

25 A. I'm not sure I'm following your

CONFIDENTIAL

Page 72

1 question. What constitutes a violation may
2 be -- must be caused?

3 BY MR. WILLIAMS:

4 Q. Well, you're calculating -- and
5 we'll get to this, but you're calculating
6 instances that you understand may be
7 violations of the state consumer protection
8 statutes, correct?

9 A. Correct.

10 Q. So for time spent, you're
11 calculating whether teens spend, on average,
12 over a certain amount of time on Instagram or
13 Facebook in a month, correct?

14 A. I'm calculating how many
15 instances there are of such -- monthly
16 instances of such teens exceeding time
17 thresholds.

18 Q. Is it your understanding that
19 those instances must be caused by the alleged
20 misconduct?

21 MS. ARORA: Objection to form.

22 A. It's my understanding that
23 those -- those instances which may reflect
24 compulsive or problematic use would be the
25 result of the alleged misconduct.

CONFIDENTIAL

Page 100

1 unfair -- unfairness claim, it would be that
2 Meta engaged in unfair practices in how it
3 designed and deployed the platform that
4 resulted in certain teens engaging in
5 compulsive or problematic use.

6 And what I'm measuring is the
7 number of instances that Teen Accounts are
8 exceeding a certain amount of time on the
9 platforms.

10 Q. And did you -- you're not
11 offering any opinion on whether the
12 time spent instances are caused by the unfair
13 practices, correct?

14 MS. ARORA: Objection to form.

15 A. I'm not. That would be a
16 causation opinion, and other evidence will be
17 presented. That's not part of my scope of
18 work.

19 BY MR. WILLIAMS:

20 Q. Do you know what specific
21 evidence will be presented regarding that
22 issue?

23 A. Not specifically, no.

24 Q. Did you do anything to assess
25 the reasonableness of -- well, strike that.

CONFIDENTIAL

Page 101

1 You're not offering a causation
2 opinion in any respect in this action,
3 correct?

4 MS. ARORA: Objection to form.

5 A. That's correct. I'm not
6 offering opinions on the causation, meaning
7 that there was a violation of UDAP, either in
8 terms of unfair or deceptive practices.

9 BY MR. WILLIAMS:

10 Q. And is it fair to say that
11 you're assuming that the design features --
12 strike that.

13 Earlier you testified that your
14 understanding is that the time spent
15 violations may account for violations for
16 both the unfair practices and the deceptive
17 statements, correct?

18 A. Correct.

19 Q. What's your understanding of
20 the causal connection between the time spent
21 instances and the deceptive statements?

22 MS. ARORA: Objection to form.

23 A. It would be assertions made
24 that Meta engaged in deceptive statements
25 about the addictive nature of its platform.

CONFIDENTIAL

Page 102

1 BY MR. WILLIAMS:

2 Q. I'm sorry, and how does that --
3 how does that have a causal relationship to
4 the time spent instances that you're
5 calculating?

6 MR. BERGE: Objection to form.

7 MS. ARORA: Objection to form.

8 A. Well, it would -- it would be
9 that because Meta engaged in statements that
10 would give teens, for example, reason to
11 believe that the platform was not addictive,
12 and then they get onto the platform and some
13 of them end up engaging in compulsive or
14 problematic use. That would be the
15 connection.

16 BY MR. WILLIAMS:

17 Q. So but for the allegedly
18 deceptive statements, these instances of time
19 spent on the platform would not have
20 occurred, correct?

21 MS. ARORA: Objection to form.

22 MR. BERGE: Objection to form.

23 A. Well, I think, again, that
24 would be one element of what caused the --
25 the assertions that the State would make is

CONFIDENTIAL

Page 103

1 that that would be one element of what caused
2 this high level of use by certain teens.

3 BY MR. WILLIAMS:

4 Q. And another element would be
5 the unfair features, correct?

6 A. Would be unfair practices in
7 how the platform was designed and deployed,
8 yes.

9 Q. And is it fair to say that for
10 purposes of your calculations, you're
11 assuming the causal connection between the
12 alleged misconduct and the time spent on the
13 platform?

14 MS. ARORA: Objection to form.

15 MR. BERGE: Objection.

16 A. I am assuming causation, but I
17 have done certain work to establish the
18 reasonableness of my assuming that causation.

19 BY MR. WILLIAMS:

20 Q. And what work did you do?

21 A. Well, so, for example here,
22 because part of the claim is unfair practices
23 that attempt to essentially maximize use of
24 teens on the platform, I did look at what
25 evidence is there that Meta was engaging in

CONFIDENTIAL

Page 104

1 an effort to acquire teens, retain teens and
2 maximize their engagement. And there is a
3 section of my report that discusses that
4 evidence.

5 Q. Did you look at any evidence
6 that the specific at-issue design features
7 caused you -- caused teens to spend more time
8 on the platform?

9 MS. ARORA: Objection to form.

10 A. Not specific to those features,
11 no.

12 BY MR. WILLIAMS:

13 Q. So you don't have any basis for
14 your assumption that the specific design
15 features caused teens to spend time on the
16 platform, correct?

17 MS. ARORA: Objection to form.

18 A. Well, I mean, again, those
19 design features are part of what the States
20 are asserting are unfair practices in order
21 to, you know, maximize acquiring, retaining
22 and engaging teens on its platform.

23 And I did look at, in general,
24 what evidence is there that Meta was
25 attempting to acquire, retain and engage

CONFIDENTIAL

Page 105

1 teens during the relevant time period.

2 BY MR. WILLIAMS:

3 Q. I don't think that answered my
4 question.

5 You don't have any basis for
6 your assumption that the specific design
7 features at issue caused teens to spend time
8 on the platform, correct?

9 MS. ARORA: Objection to form,
10 asked and answered.

11 A. I didn't -- I did not do an
12 analysis that is specific to those features.
13 What I looked at were broader indicators of
14 wanting to acquire, retain and engage teens.
15 BY MR. WILLIAMS:

16 Q. So apart from Meta's efforts to
17 acquire and retain teens, you did not look at
18 any evidence indicating that the specific
19 design features at issue caused users to
20 spend -- sorry, caused teens to spend time on
21 the platform, correct?

22 MS. ARORA: Objection to form.

23 A. I didn't do an analysis of the
24 impact of each feature, you know,
25 individually on time spent. I didn't do

CONFIDENTIAL

Page 106

1 that.

2 BY MR. WILLIAMS:

3 Q. I'm not asking if you did an
4 analysis.

5 I'm asking if you have any
6 evidence -- strike that.

7 I'm asking if you looked at any
8 evidence indicating that the specific design
9 features at issue caused users to spend time
10 on the -- caused teens to spend time on the
11 platform.

12 MS. ARORA: Objection to form,
13 and asked and answered.

14 A. That's not something that I did
15 as part of my calculation, so I wasn't
16 looking for that evidence.

17 BY MR. WILLIAMS:

18 Q. So you don't have a reasonable
19 basis to assume that the specific design
20 features at issue caused teens to spend time
21 on the platform, correct?

22 MS. ARORA: Objection to form.

23 A. I don't think I agree with that
24 because those features may well have
25 contributed to time spent on the platform.

CONFIDENTIAL

Page 107

1 BY MR. WILLIAMS:

2 Q. But you didn't do any analysis
3 to -- strike that.

4 What's your basis for saying
5 that those features may well have contributed
6 to time spent on the platform?

7 A. Because I discuss in my report
8 that Meta was actively engaging in efforts to
9 acquire, retain and engage teens, and the way
10 they did that was, you know, through the
11 features that they had on the platform --

12 Q. Do you discuss --

13 A. -- amongst other things.

14 Q. Do you discuss those specific
15 features in your section on Meta's efforts to
16 acquire, retain and engage teens?

17 A. I don't think in that section,
18 no.

19 Q. So other than Meta's focus on
20 acquiring, retaining and engaging teens, do
21 you have any basis for your assumption that
22 the specific design features at issue here
23 caused teens to spend time on the platform?

24 MS. ARORA: Objection to form,
25 and asked and answered.

CONFIDENTIAL

Page 108

1 A. I would say what I'm discussing
2 is how general -- a broad set of elements of
3 how the platform is designed and deployed was
4 done in a way to maximize engagement and to
5 acquire and retain teens.

6 BY MR. WILLIAMS:

7 Q. Apart from Meta's general --
8 strike that.

9 Apart from your discussion of
10 Meta's general efforts to acquire and retain
11 teens, you don't have any basis for your
12 assumption that specific design features here
13 caused teens to spend time on the platform,
14 correct?

15 MS. ARORA: Objection to form,
16 asked and answered at least three
17 times.

18 MR. WILLIAMS: I don't think
19 he's answered it, please.

20 A. I did not analyze it based on
21 these specific features.

22 BY MR. WILLIAMS:

23 Q. What's your understanding of
24 the causal link between -- strike that.

25 What did you do to analyze

CONFIDENTIAL

Page 109

1 whether there's reasonable assumption for the
2 causal link that you assumed between --
3 strike that.

4 What did you do to analyze
5 whether there's a reasonable basis for the
6 causal link you assumed between the deceptive
7 statements and time spent on the platform?

8 A. I think what I looked at was
9 more of the unfairness claim as it related to
10 time spent.

11 BY MR. WILLIAMS:

12 Q. So you don't have a reasonable
13 basis for the assumption that there's a
14 causal link between the deceptive statements
15 and time spent on the platform, correct?

16 MS. ARORA: Objection to form.

17 A. I don't think I've performed
18 some specific analysis related to that.

19 BY MR. WILLIAMS:

20 Q. Your calculations don't take
21 into account why teens are spending time on
22 Instagram or Facebook, correct?

23 MS. ARORA: Objection to form.

24 A. My calculations are not
25 analyzing what specific factors are causing

CONFIDENTIAL

Page 110

1 teens to spend time on the platform.

2 BY MR. WILLIAMS:

3 Q. Nor are they taking into
4 account what specific factors are causing
5 teens to spend time on the platform, correct?

6 MS. ARORA: Objection to form.

7 A. Well, I mean, I -- I understand
8 what types of elements would cause them to
9 spend time on the platform. I discuss them a
10 bit.

11 So, for example, at one point
12 they were reducing ad load to teens in order
13 to get them to spend more time on the
14 platform, and it resulted in increasing time
15 spent in acquisition of teens.

16 BY MR. WILLIAMS:

17 Q. Your time spent calculations
18 may include instances where teens spend over
19 one of the thresholds you calculate on
20 average in a month on the platform, and that
21 time spent is caused by reasons unrelated to
22 the allegedly wrongful conduct, correct?

23 MS. ARORA: Objection to form.

24 A. That's possible, yes.

25 ///

CONFIDENTIAL

Page 150

1 there were, you know, false statements being
2 made about the safety of the platform and
3 that there were -- there was a mission of
4 disclosure of information that was known by
5 Meta about the safety of the platform.

6 Q. So your understanding is that
7 there's deceptive statements being made; your
8 understanding is that there are negative
9 experiences on the platform.

10 And your testimony is that
11 that's sufficient to assume that the
12 deceptive statements are causing the negative
13 experiences that you're measuring?

14 MS. ARORA: Objection to form.

15 MR. BERGE: Objection, form.

16 A. There are deceptive statements
17 being made, and then there's a lack of
18 release of known information by Meta as to
19 the harms of the platform from all this
20 research that they had conducted, which I did
21 discuss in my report, and that those would be
22 related to -- or the causal factors for that
23 deception claim.

24 BY MR. WILLIAMS:

25 Q. And what basis do you have to

CONFIDENTIAL

Page 151

1 assume that the omission of information or
2 deception, alleged deception, caused the
3 negative experiences that you're measuring?

4 MS. ARORA: Objection to form.

5 A. You're asking me again about
6 whether I have an opinion about causation. I
7 don't.

8 BY MR. WILLIAMS:

9 Q. Well, I'm asking you -- you're
10 a damages expert, right?

11 A. Yes.

12 Q. Are you opining as a damages
13 expert here?

14 A. Yes.

15 Q. It's important -- would you
16 agree that a damages expert should have a
17 reasonable basis for causation, even if
18 they're assuming causation?

19 A. I would agree with that.

20 Q. And so I'm trying to understand
21 what is your reasonable basis for assuming a
22 causal link between the deception or omission
23 that you understand the AGs are alleging and
24 the negative experiences that you're
25 measuring?

CONFIDENTIAL

Page 152

1 A. It's -- it's press releases
2 about safety features that Meta is -- was
3 putting out there, with those features
4 generally not being effective, as I discuss
5 in my report.

6 It's these community
7 enforcement reports that would give one the
8 impression that there's a low rate of bad
9 encounters on the platform.

10 It's all these other research
11 studies that I've cited in my report that
12 were not released to the public.

13 Q. Other than those things, do you
14 have any other basis for assuming that
15 there's a causal link between the alleged
16 deceptive -- deception or omission and the
17 negative experiences that you're measuring?

18 MR. BERGE: Objection.

19 A. No, because I think those items
20 are sufficient to establish a reasonable
21 basis for me to assume causation.

22 Again, I'm not going to prove
23 causation here. Other evidence will be
24 presented in this case.

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CONFIDENTIAL

Page 363

1 CERTIFICATE

2 I, MICHAEL E. MILLER, Fellow of
3 the Academy of Professional Reporters,
4 Registered Diplomate Reporter, Certified
5 Realtime Reporter, Certified Court Reporter
6 and Notary Public, do hereby certify that
7 prior to the commencement of the examination,
8 CARL S. SABA was duly sworn by me to testify
9 to the truth, the whole truth and nothing but
10 the truth.

11 I DO FURTHER CERTIFY that the
12 foregoing is a verbatim transcript of the
13 testimony as taken stenographically by and
14 before me at the time, place and on the date
15 hereinbefore set forth, to the best of my
16 ability.

17 I DO FURTHER CERTIFY that pursuant
18 to FRCP Rule 30, signature of the witness was
19 not requested by the witness or other party
20 before the conclusion of the deposition.

21 I DO FURTHER CERTIFY that I am
22 neither a relative nor employee nor attorney
23 nor counsel of any of the parties to this
24 action, and that I am neither a relative nor
25 employee of such attorney or counsel, and
that I am not financially interested in the
action.



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