

Exhibit 3

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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 82

1 Q. And in subparagraph (a), this
2 is referring to your -- or this is describing
3 your assignment as to the time spent
4 calculations, correct?

5 A. That's correct.

6 Q. And you say: I understand that
7 the MDL plaintiffs claim that these instances
8 may represent or be the result of violations
9 of the UDAP statutes during the relevant time
10 period.

11 Correct?

12 A. That's correct.

13 Q. You're not offering any opinion
14 that your time spent calculations do
15 constitute violations of the consumer
16 protection statutes, correct?

17 MS. ARORA: Objection to form.

18 A. I am not. That would be a
19 causation opinion. I don't have any
20 causation opinions.

21 BY MR. WILLIAMS:

22 Q. You're not offering an opinion
23 that they may represent violations, right?

24 MS. ARORA: Objection to form.

25 A. I think I would give you the

CONFIDENTIAL

Page 83

1 same answer.

2 BY MR. WILLIAMS:

3 Q. And you don't have any opinion
4 that they may be the result of violations of
5 any consumer protection statutes, correct?

6 MS. ARORA: Objection to form.

7 A. I don't.

8 BY MR. WILLIAMS:

9 Q. You describe two possibilities,
10 that the time spent calculations may
11 represent or be the result of violations of
12 the state consumer protection statutes,
13 correct?

14 A. That is correct.

15 Q. And as between those two
16 possibilities, you have no opinion as to
17 which is correct, right?

18 A. I don't have an opinion as to
19 whether one or both would apply.

20 Q. Or whether -- strike that.

21 What do mean -- well, when you
22 say that your time spent instances, quote,
23 may represent the result of violations of the
24 state consumer protection statutes, does that
25 mean it's possible that your calculations may

CONFIDENTIAL

Page 84

1 not represent violations as well?

2 MS. ARORA: Objection to form.

3 A. Again, that would be for the
4 Court to determine. I think I've described
5 to you that certain time thresholds and not
6 others may be determined by the Court to be
7 violations or to be the result of violations.
8 BY MR. WILLIAMS:

9 Q. Well, I guess I'm getting at
10 something different.

11 It sounds to me like your
12 response was that the Court may conclude that
13 these are not violations, correct?

14 A. That's possible.

15 Q. But what I'm asking is: If the
16 Court concludes -- strike that.

17 You don't have a view how
18 calculations -- how violations should be
19 calculated under the consumer protection
20 statutes, correct?

21 A. I don't think I have an
22 interpretation of how the violations should
23 be calculated, but I do understand how my
24 calculations relate to the claims of
25 violations.