

EXHIBIT 15

CONFIDENTIAL

Page 419

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, VOLUME II
Palo Alto, California
November 20, 2024

Job No. 6933456
Pages 419 - 615
JENNY L. GRIFFIN, CSR No. 3969 - RMR, CRR, CCRR, CRC

CONFIDENTIAL

Page 438

- - -

KYLE ANDREWS, PhD

having been first duly and/or affirmed by the
Certified Shorthand Reporter to tell the truth, the
whole truth, and nothing but the truth, testified as
follows:

CONTINUED EXAMINATION

BY MR. HALPERIN:

Q. Good morning, Dr. Andrews, and welcome
back.

A. Good morning. Thank you.

Q. I want to start our discussion this morning
with the topic that the lawyers for plaintiffs spent
a lot of time asking you questions about, which was
the BEEF survey.

A. Okay.

Q. Can you, just to reorient us, tell us what
the purpose of the BEEF survey was.

A. Sure. So, internally, one of the ways in
which we try to reduce potential experiences is by
building machine-learning models. And these are
computational models that are able to sort of
predict when certain kinds of things are happening
so we can take them down before anyone sees them.
That -- those kinds of models require lots of data

CONFIDENTIAL

Page 439

1 in order to improve and build them.

2 The main purpose of BEEF was to gather a
3 bunch of data from users about -- who have said that
4 they have experienced certain things so we can feed
5 them into the model and get our models better at
6 predicting those things so we can reduce them. That
7 was the main first purpose.

8 The second big purpose was looking at a
9 test versus control and seeing how well we were
10 doing in reducing those experiences. And in this
11 case, tests would be a group of people who have
12 everything that the team has shipped, every product
13 change we've made in the last six months.

14 And the control group is a group of people
15 that have, you know, a version of the product from
16 six months ago. And we look to see did we reduce
17 the number of, you know, bad experiences in the test
18 group versus the control group.

19 So those are the two main purposes.

20 Q. So let me just make sure I understand. Was
21 one of the -- actually, let's go to -- why don't we
22 pull up Exhibit 14, please.

23 And could we turn -- and let me know when
24 you have it, Dr. Andrews -- could we turn to the --
25 I think it's the second page.

CONFIDENTIAL

Page 611

---o0o---

I, JENNY L. GRIFFIN, hereby certify:

That I am a certified shorthand reporter in and for the County of Alameda, State of California;

Prior to being examined, KYLE ANDREWS, the witness named in the foregoing deposition, was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth; that said deposition was taken pursuant to notice at the time and place therein set forth, and was taken down by me in stenotype and thereafter transcribed by means of computer-aided transcription, and that said deposition is a true record of the testimony given by the witness.

I further certify that I am neither counsel for nor related in any way to any party to said action, nor otherwise interested in the outcome thereof.

In witness whereof, I have hereunto subscribed my name November 30, 2024.



JENNY L. GRIFFIN, CSR #3969
Certified Shorthand Reporter