

Filed Under Seal

Exhibit M

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT :MDL NO.
ADDICTION/PERSONAL INJURY PRODUCTS :4:22-MD-
LIABILITY LITIGATION :3047-YGR
:

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
SPRING STREET COURTHOUSE

COORDINATION PROCEEDING SPECIAL TITLE :
(RULE 3.400) :LEAD CASE
:NO. FOR
SOCIAL MEDIA CASES :FILING
:PURPOSES
:22STCV21355
:

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
DEPOSITION UNDER VIDEO EXAMINATION OF
LOTTE RUBAEK
April 1, 2025

Videotaped deposition of LOTTE RUBAEK taken
pursuant to notice, was held at the law offices of
Lieff Cabraser Heimann & Bernstein, 250 Hudson
Street, New York, New York, beginning at 9:03 a.m.
Eastern, on the above date, before Michelle L.
Ridgway, a Registered Professional Reporter,
Certified Court Reporter (NJ-CCR # XI02126),
Certified Realtime Reporter, Certified Shorthand
Reporter (CA-CSR # 14592), and Notary Public.

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1 fully developed. Their frontal lobes are
2 not fully developed. So they -- the things
3 they experience, they affect them in a
4 different way than they affect adults.

5 They haven't fully developed
6 their social skills, their affect
7 regulation skills. They are not fully
8 aware of the consequences. It's difficult
9 for them to, like adults, to calculate
10 risks and calculate consequences of their
11 behavior.

12 They are also more curious
13 by nature. That's because they are in a
14 developmental state where their identity is
15 one of their primary developmental tasks.
16 So they have to be curious about what's
17 going on in their surroundings.

18 And they're also --
19 especially girls -- but they are also very
20 comparing themselves very much with others
21 because, again, they are forming their
22 identity.

23 So when a girl, for example,
24 sees a lot of images on social media with
25 images of friends or celebrities or

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1 influencers with very specific and
2 unrealistic body ideals, then it affects
3 children more than it would affect adults
4 because -- and you can see that from brain
5 scans as well, that a specific area in the
6 brain is more active when they compare
7 themselves with others and with beauty
8 standards that are unrealistic.

9 So that will affect a
10 child's behavior more. For example, the
11 development of eating disorders or how they
12 eat, how they work out, everything
13 connected to beauty ideals. Also what they
14 buy.

15 So, for example, children
16 are -- when you see these very -- because
17 of the filters on social media and the
18 photoshopping of the images, children are
19 more prone to, for example, buy a cosmetic
20 product or buy something that could fix the
21 problem.

22 So when you see all of these
23 beauty -- unrealistic beauty standards side
24 by side with advertisement for cosmetic
25 products, and the beauty industry in

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1 BY MS. FLOWERS:

2 Q. Do you know if this content is
3 still up there today?

4 MR. CHAPUT: Object to form.

5 THE WITNESS: I don't know
6 if the exact same content is still up
7 there, but I know that there's a lot more
8 concern that has come since then, the same
9 type and -- and, yeah.

10 BY MS. FLOWERS:

11 Q. And to be clear, this is the same
12 sort of content that was the subject of the
13 documentary called "A Dead Girls' Diary," right?

14 A. Yes, it is.

15 MR. CHAPUT: Objection.
16 Form. Foundation.

17 THE WITNESS: So it is
18 self-harm content, and it is -- it is very
19 shocking content.

20 So when you see it, you will
21 be affected by it. And it is very -- yeah.
22 There's a lot of blood and very severe
23 damages on young people's bodies.

24 BY MS. FLOWERS:

25 Q. Let's move forward a few months to

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1 publicly called out Meta for harming kids after the
2 documentary, right?

3 A. Yes.

4 Q. And here, you sat down with them
5 privately and went through the problems that your
6 patients were reporting in detail?

7 A. Yes.

8 Q. At some point after this
9 presentation, were you asked by Meta to join the
10 global -- what they call the Global SSI Expert
11 Advisory Board?

12 A. Yes, I was. I guess when I
13 presented all of this to [REDACTED] he mentioned
14 it. He mentioned the global expert group at that
15 meeting for the first time. And then at a later
16 point, he reached out to me and asked if I could be
17 interested in joining this group.

18 Q. And did you agree to serve on that
19 group?

20 A. Yes, I did.

21 Q. What did you hope to achieve?

22 A. I was very hopeful. I hoped that,
23 because of all the risks and all the damages I saw
24 that Instagram was doing to the young people that I
25 work with, and also what I heard from the rest of

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1 "safe, positive, age-appropriate experiences,"
2 consistent with what you see in your patients?

3 MR. CHAPUT: Object to form.
4 Foundation.

5 THE WITNESS: No, definitely
6 not.

7 BY MS. FLOWERS:

8 Q. And if you continue down a little
9 bit, it says, the last sentence of the next
10 paragraph, "We'll continue working with parents,
11 experts, industry peers, and Congress to try to
12 improve child safety, not just on our services, but
13 across the internet as a whole."

14 Is that consistent -- is child
15 safety being first consistent with your experience
16 with Meta?

17 MR. CHAPUT: Object to form.
18 Foundation.

19 THE WITNESS: No, not at
20 all.

21 MS. FLOWERS: Let's look at
22 8, please.

23 (Document marked for
24 identification as (Meta) Lotte Rubaek
25 Exhibit 9.)

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1 A. Yes.

2 Q. And it talks a lot about safety?

3 MR. CHAPUT: Object to form.

4 THE WITNESS: Yes.

5 BY MS. FLOWERS:

6 Q. Building a sense of self and
7 community?

8 MR. CHAPUT: Counsel, would
9 you like to point us to what specifically
10 in the document you're narrating?

11 MS. FLOWERS: The bottom of
12 the bullet, last pages -- last two pages of
13 the bullet, last three pages, last two
14 pages.

15 MR. CHAPUT: Thank you.

16 MS. FLOWERS: Sure.

17 BY MS. FLOWERS:

18 Q. Are you there, Ms. Rubaek? In
19 partnership with these advisors, it's under
20 "Talking to the Experts."

21 Do you see that?

22 A. Yes.

23 Q. And there are principles listed
24 down at the bottom.

25 "1, Putting kids first."

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1 A. Mm-hmm.

2 Q. "Providing a safe space that
3 fosters joy, humor, play and adventure.

4 "3, Enabling kids to mine their own
5 potential by building for empowerment, creativity
6 and expression.

7 "4, Helping kids build a sense of
8 self and community."

9 And, "5, Recognizing the
10 relationship between parent and child, and that we
11 take our responsibility and their trust in us
12 seriously."

13 A. Yes.

14 Q. Was this message consistent with
15 the sorts of messages that Meta provided to you
16 while you served on their expert panel?

17 MR. CHAPUT: Object to the
18 form.

19 THE WITNESS: This was not
20 what I experienced in the expert group. It
21 was the way the expert group was used that
22 made me -- that gave me the impression that
23 Instagram -- that this was not on top of
24 their priority list.

25 The things they said at the

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1 meetings, in the expert groups, could be
2 something along these lines, but there was
3 a big contrast in what was being said and
4 what was being done.

5 BY MS. FLOWERS:

6 Q. Let's -- let's talk about the
7 expert group, then, that you were asked to join.
8 When did that happen?

9 A. I had a meeting with [REDACTED]
10 [REDACTED] in December of 2020, and I guess my first
11 meeting was in January. I'm not sure. But I
12 attended the next meeting in the expert group after
13 my meeting with her.

14 Q. Are you doing okay? Do you need a
15 break?

16 A. Yeah, we could have a short break.

17 MS. FLOWERS: Let's take ten
18 minutes, five minutes. Let's go off the
19 record.

20 THE VIDEOGRAPHER: The time
21 right now is 10:09 a.m. We are off the
22 record.

23 (Short break.)

24 THE VIDEOGRAPHER: The time
25 right now is 10:23 a.m. We're back on the

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1 A. Okay. Yeah.

2 Q. Tell us what that was like.

3 MR. CHAPUT: Object to the
4 form.

5 THE WITNESS: I think -- it
6 was -- if I was only -- I was going to say
7 only one word, it would be I was very
8 disappointed.

9 My hopes were sky high. I
10 thought that this could really mean
11 something to the children and the
12 adolescents that I saw were suffering from
13 the dynamics and the impact of the design
14 of social media, especially the lack of
15 moderation of this harmful content.

16 And, yeah, I was very
17 excited to be able to make a difference for
18 the children, children and adolescents.
19 And I was -- I was so well prepared for the
20 first meeting. I had read and printed
21 every study on social media and what we
22 know about the impact on suicide,
23 self-injury, and eating disorders.

24 So sitting there, about to
25 join the first -- and it was online

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1 you served on the expert group in 2021?

2 A. Yes, I did.

3 Q. Did Meta -- outside of the expert
4 group meetings, did Meta ever communicate with you
5 about the Frances Haugen story in The Wall Street
6 Journal?

7 A. Yes. That was one of the occasions
8 where the -- [REDACTED], I'm not sure I
9 pronounced his surname correct, when he wrote us an
10 e-mail.

11 Before that, I had -- I had
12 contacted the head of the Nordic countries, [REDACTED]
13 [REDACTED] because I was shocked to see what Frances
14 Haugen could tell -- had to tell about the -- yeah,
15 the research that Instagram had been doing and
16 taken action on to improve safety for young --
17 young people on the platforms.

18 So, yeah, I thought -- I wrote an
19 e-mail to [REDACTED] to let him know that I didn't
20 see any -- I didn't see any reason to continue in
21 the expert group, when Instagram -- when the top
22 priority of Instagram seemed to be profit over
23 young people's safety.

24 When I -- as I wrote to him in that
25 e-mail, I thought the expert group was more like a

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1 Q. Are you familiar with Meta's claims
2 that you can't take down content because it's
3 therapeutic to kids?

4 MR. CHAPUT: Object to the
5 form.

6 THE WITNESS: Yes. Yes,
7 I've heard that before.

8 And I have -- I have, at
9 more than one circumstance, told [REDACTED]
10 [REDACTED] and the expert in the expert group
11 that leaving content like this -- sometimes
12 Meta, the reasons they give for not
13 removing content like this is that it's --
14 it's a person's cry for help, and that they
15 want the family, the closest family
16 members, to see it so that they can reach
17 out to the person and help them.

18 And what I have pointed to,
19 at least several occasions, is that it is
20 very important, on a social media platform
21 where you can reach thousand and even
22 millions of other young people, that
23 content like this is removed instantly,
24 because it can hurt, and it can even be the
25 reason why a lot of young people take their

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1 the topics we are talking about today,
2 suicide and nonsuicidal self-injury.

3 BY MS. FLOWERS:

4 Q. And these are impressions that
5 you've -- sorry. Strike that.

6 These are observations that you've
7 gained from your own clinical practice; is that
8 right?

9 MR. CHAPUT: Object to the
10 form.

11 THE WITNESS: These are
12 observations from my own clinical practice,
13 and it is also based on research.

14 BY MS. FLOWERS:

15 Q. Did there come a time when you
16 resigned from the expert panel?

17 A. Yes. I resigned from the expert
18 panel March -- so a year ago, March 2024.

19 Q. What happened to lead you to resign
20 from the expert advisory board?

21 A. I had been -- I had been thinking
22 about doing it almost all the time I was there,
23 because I quickly realized that my expertise was
24 not used in the expert group.

25 In a period, for a while, I also

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CERTIFICATE

I HEREBY CERTIFY that the witness was duly sworn by me and that the deposition is a true record of the testimony given by the witness.

It was requested before completion of the deposition that the witness, LOTTE RUBAEK, have the opportunity to read and sign the deposition transcript.



MICHELLE L. RIDGWAY,
Certified Shorthand Reporter,
(CA-CSR # 14592)
(Certified Court Reporter
(NJ-CCR # XI02126)
Registered Professional Reporter,
Certified Realtime Reporter
and Notary Public
Dated: April 4, 2025

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