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Exhibit V

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STATE OF NEW MEXICO  
COUNTY OF SANTA FE  
FIRST JUDICIAL DISTRICT COURT

STATE OF NEW MEXICO,  
EX REL., RAÚL TORREZ,  
ATTORNEY GENERAL

NO. D-101-CV-2023-02838

VS.

META PLATFORMS, INC.;  
INSTAGRAM, LLC; META  
PAYMENTS, INC.; AND META  
PLATFORMS TECHNOLOGIES,  
LLC

\*\*\* CROSS-NOTICED WITH \*\*\*  
SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

COORDINATION PROCEEDING  
SPECIAL TITLE  
[RULE 3.400]

JUDICIAL COUNCIL  
COORDINATION  
PROCEEDING NO. 5255

SOCIAL MEDIA CASES

THIS DOCUMENT RELATES TO: For Filing Purposes:  
22STCV21355

All cases:  
(Christina Arlington  
Smith, et al. v. TikTok,  
Inc., et al., Case No.  
22STCV21355)

\* \* \* \* \*

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(CAPTION CONTINUED)

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(CAPTION, CONTINUED)

VIDEOTAPED DEPOSITION OF  
JASON R. SATTIZAHN, Ph.D.

December 8, 2025

Held at Simon Peragine Smith & Redfearn  
1100 Poydras Street, 30th Floor  
New Orleans, Louisiana 70163

Reported stenographically by:  
Rita A. DeRouen, CCR, RPR  
(CCR #2014018)  
(RPR #006908)

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1 study came from my colleague on the virtual  
2 reality youth team, the research study itself was  
3 an intimate collaboration with Instagram youth  
4 team, as well as youth teams on other products.

5 "The Instagram youth team and their  
6 researcher, [REDACTED], not only helped  
7 develop the project, but they committed and  
8 planned their own recommendations on how Instagram  
9 should alter its age data collection approach  
10 based on the findings of the study."

11 Is that your testimony before Congress?

12 A. It is.

13 Q. And can you describe the coordination or  
14 the collaboration between you and virtual reality  
15 and [REDACTED].

16 A. My colleague, Sarah Cayce Savage, was  
17 operating -- basically leading the youth team for  
18 virtual reality. And when she approached [REDACTED]  
19 [REDACTED] on Instagram to talk about age data and how  
20 to collect better age data, the Instagram team,  
21 through [REDACTED] passed both Cayce and myself a  
22 lot of knowledge, existing knowledge, on age data  
23 both within Facebook and Instagram, actually  
24 guiding us to a researcher in Facebook.

25 And what was reported to us and what we

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learned from the literature review and the existing research was that the same issues that we had already established in virtual reality in terms of people not being honest about age and also that age data is required to make a platform safe were also a problem with Instagram as well as Facebook.

And so after that knowledge was acquired, my colleague, Cayce Savage, put together a research study along with [REDACTED] saying, Hey, how do we figure out how to get people to give us better age data because that will help us make a safer platform. That's sort of how the study came to be.

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**■** **■**

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1 knowledge base of parents in order to understand  
2 Meta's products?

3 A. Yes.

4 Q. Would that include how parents acquire  
5 knowledge about social media products?

6 A. Yes.

7 Q. If you see here on the bottom it says,  
8 "This creates a bottom-up dynamic around VR  
9 safety."

10 Do you see that?

11 A. I do.

12 Q. "Parent participants mostly rely on  
13 trust" -- "rely on and trust their teens to inform  
14 them of any issues, as they don't have the  
15 knowledge or the proactively" -- "to proactively  
16 oversee the experiences they are having."

17 Is that something that you produced to  
18 Congress?

19 A. Yes, it is.

20 Q. And what does that mean?

21 A. One of the recurring findings with  
22 parental controls in research that my colleague  
23 made, that I myself ran and from other researchers  
24 at Facebook and Instagram, is this statement here  
25 that parents do not have the knowledge to

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1 proactively oversee children's experiences.

2 And what that means is that if a parent  
3 doesn't have good tech literacy, if they don't  
4 know how a surface functions about how social  
5 media or VR works, it's really hard to get them to  
6 either, A, have awareness of what these tools are;  
7 B, know how to functionally use them to keep  
8 someone safe; and also C, and this is very  
9 important, to even care enough to try to use them  
10 in the first place.

11 And so between this awareness and  
12 knowledge and even just caring about it, this is a  
13 finding that was recurring across Meta's products.

14 Q. Meta was aware of this while you were  
15 employed at Meta, correct?

16 A. Correct.

17 Q. And this would include the same concept  
18 -- it would include Facebook and Instagram users,  
19 correct?

20 MR. STANNER:

21 Objection; speculation.

22 BY MR. MIGLIORI:

23 Q. This isn't limited to just virtual  
24 reality, correct?

25 MR. STANNER:

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1 cross-collaborative environment.

2 Q. Right. Oh, I'm sorry, I thought you  
3 were done.

4 A. No, it was something that actually -- it  
5 was one of the aspects of working there that I  
6 really appreciated, is the fact that you can work  
7 with anybody. Or they might call you up and be  
8 like, Do you want to work on this project with us,  
9 like on any part of the products. So...

10 Q. Right. But -- and this is what I think  
11 I'm just trying to drill down on, understanding  
12 that the different teams could collaborate, they  
13 are different teams; the Instagram researcher team  
14 is different than the Reality Labs researcher  
15 team?

16 A. Functionally, yes, there's different  
17 actual names of teams.

18 Q. Right. And there's different people on  
19 them. If I showed you an org chart of the  
20 Instagram user research team, you wouldn't be on  
21 it?

22 A. Correct.

23 Q. There would -- presumably there's an org  
24 chart of the Reality Labs user research team,  
25 right?

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1           A.    I don't know if I ever saw one, but I  
2    would assume there is, yeah.

3           Q.    I mean, if we had to make a list of who  
4    works at user research in Reality Labs from 2021  
5    until 2024, your name would be on it?

6           A.    Correct.

7           Q.    Right. But it wouldn't be on the name  
8    on the user research team at Instagram or Facebook  
9    or the other apps?

10          A.    No.

11          Q.    Okay. But I do understand -- so, for  
12    example, when you wanted to do some work at  
13    Reality Labs about age verification, one thing you  
14    did is reach out to these other teams at Instagram  
15    or elsewhere and say, Show us what you've got on  
16    age verification so we can use it in our own  
17    research?

18          A.    Yes, that was an aspect of it. I  
19    wouldn't say that that summarizes all of the  
20    working relationship, but that's an aspect of it,  
21    yes.

22          Q.    Right. And when you'd go to your  
23    offsites, for example, that would be offsites of  
24    people who worked on VR?

25          A.    Yes and no. Actually, we had offsites

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1 on engagement, that is exactly how the company  
2 operates. The pursuit of user engagement is the  
3 value that permeated Meta's every decision. For  
4 years our workforce was told that the directive to  
5 prioritize growth and engagement came from Mark  
6 Zuckerberg himself."

7 Q. Is that your sworn testimony to  
8 Congress?

9 A. It is.

10 Q. Is that what you understood to be the  
11 priorities of Meta while you were there?

12 MR. STANNER:

13 Object to the scope.

14 A. It was.

15 BY MR. MIGLIORI:

16 Q. You were asked questions directly by  
17 counsel, weren't you, about Mark Zuckerberg,  
18 weren't you?

19 A. I was.

20 Q. And did you understand that when he was  
21 asking you questions about whether or not the  
22 information went up to Mark Zuckerberg, that he  
23 was talking about the top-down -- the top-down  
24 pressures, I think was the term, on your work?

25 MR. STANNER:

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1 Same objection.

2 BY MR. MIGLIORI:

3 Q. Do you remember that?

4 A. I do, yes.

5 Q. And what do you understand, based on the  
6 testimony you have here before the Senate, were  
7 the top-down pressures of Mark Zuckerberg on the  
8 research that you-all did at Meta?

9 MR. STANNER:

10 Same objection. Go ahead.

11 A. I understood the top-down pressures from  
12 Mark Zuckerberg, the C-suites, and the leaders to  
13 be all work needs to be tied to growth and  
14 engagement, and that was the prioritizing factor  
15 for any work moving forward with the company.

16 Q. And was that prioritized over safety in  
17 your experience?

18 MR. STANNER:

19 Same objection, asked and answered,  
20 scope.

21 A. Yes.

22 MR. MIGLIORI:

23 That's all I have -- actually,  
24 that's all I have.

25 MR. STANNER:

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## REPORTER'S CERTIFICATE

1  
2 I, Rita A. DeRouen, Registered  
3 Professional Reporter (RPR #6908) and Certified  
4 Court Reporter (Certificate #2014018) in and for  
5 the State of Louisiana, as the officer before whom  
6 this testimony was taken, do hereby certify that  
7 on December 8, 2025, in the above-entitled and  
8 numbered cause, the deposition of JASON RYAN  
9 SATTIZAHN, Ph.D., after having been duly sworn by  
10 me upon authority of R.S. 37:2554, did testify as  
11 hereinbefore set forth in the foregoing 502 pages;  
12

13 That this testimony was reported by me  
14 in stenographic shorthand, was prepared and  
15 transcribed by me or under my personal direction  
16 and supervision, and is a true and correct  
17 transcript to the best of my ability and  
18 understanding;  
19

20 That the transcript has been prepared in  
21 compliance with transcript format guidelines  
22 required by statute or by rules of the board;  
23

24 That I have acted in compliance with the  
25 prohibition on contractual relationships, as

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1 defined by Louisiana Code of Civil Procedure  
2 Article 1434 and in rules and advisory opinions of  
3 the board;

4  
5 That I am not of Counsel, nor related to  
6 any person participating in this cause, and am in  
7 no way interested in the outcome of this event.

8  
9 Signed this 15th day of December, 2025.

10  
11   
12

13 RITA A. DEROUEN

14 Registered Professional Reporter  
15 Certified Court Reporter  
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