

Exhibit D

PURSUANT TO PROTECTIVE ORDER

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION/PERSONAL)
INJURY PRODUCTS LIABILITY) MDL No. 3047
LITIGATION)
-----)
THIS DOCUMENT RELATES TO:)
ALL ACTIONS)

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 Filing
SOCIAL MEDIA CASES) Purposes
-----) 22STCV21355

MONDAY, DECEMBER 16, 2024

CONFIDENTIAL - ATTORNEYS' EYES ONLY -
PURSUANT TO PROTECTIVE ORDER

- - -

Videotaped deposition of George
Volichenko, held at the offices of Lief
Cabraser Heimann & Bernstein, LLP, 275
Battery Street, 29th Floor, San Francisco,
California, commencing at 9:05 a.m. Pacific
Time, on the above date, before Carrie A.
Campbell, Registered Diplomat Reporter,
Certified Realtime Reporter, Illinois,
California & Texas Certified Shorthand
Reporter, Missouri, Kansas, Louisiana & New
Jersey Certified Court Reporter.

- - -

Job No. 7053449

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1 QUESTIONS BY MR. WARREN:

2 Q. Okay. Very well.

3 So let me reask some questions
4 now that that's clarified, and thank you for
5 clarifying it.

6 In the course of your work on
7 problematic use with the mental well-being
8 team, did actual or potential lawsuits about
9 social media addiction come up?

10 MR. CHAPUT: Object to the
11 form.

12 THE WITNESS: Yes. I was made
13 aware of a, you know, a high chance of
14 lawsuits coming up by my management in
15 kind of one-on-one meetings and
16 conversations.

17 QUESTIONS BY MR. WARREN:

18 Q. Okay. And can you tell me with
19 who those conversations were with?

20 A. Yeah. It was with my manager.
21 His name is [REDACTED], with an
22 apostrophe after the D.

23 Q. Okay. And what did he say
24 about potential litigation?

25 A. He said that -- he said that

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1 part of the reason why our work is so
2 important is that, you know, we are likely
3 going to be facing litigation, and we need to
4 present that we're, like, doing something
5 about it, right? That we're actually trying
6 to tackle these issues by launching features,
7 by, you know, doing analysis and all that
8 stuff.

9 (Volichenko Exhibit 1 marked
10 for identification.)

11 QUESTIONS BY MR. WARREN:

12 Q. Okay. Let me show you the
13 first exhibit of the day. We're going to
14 mark this Volichenko 1.

15 MS. KRAMER: Take your time.

16 THE WITNESS: Yeah. Okay.

17 QUESTIONS BY MR. WARREN:

18 Q. I'm going to start with a very
19 easy question.

20 A. Okay.

21 Q. Have you seen this document
22 before?

23 A. Yes, I believe I have.

24 Q. Okay. And for the record, this
25 is a document with the Bates stamp ending in

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1 So at the very least, they want
2 to show that they're doing stuff to
3 launch features.

4 We had a separate team doing,
5 like, media for all these features
6 that we launched, just to make it,
7 like, more public.

8 QUESTIONS BY MR. WARREN:

9 Q. George, did you feel like your
10 job was to build features as a defense to
11 potential litigation rather than to actually
12 help the safety and health of teenagers?

13 MR. CHAPUT: Object to form.

14 THE WITNESS: Yes, I did.

15 QUESTIONS BY MR. WARREN:

16 Q. And is that why you ultimately
17 quit?

18 MR. CHAPUT: Object to the
19 form.

20 THE WITNESS: That was a major
21 factor; not the only one.

22 QUESTIONS BY MR. WARREN:

23 Q. How much were you paid at the
24 time you were working there?

25 A. So I had about 210, 210,000, in