

Filed Under Seal

Exhibit H

Page 1

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-3047-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  
DARIUS KILSTEIN, VOLUME I  
Palo Alto, California  
December 17, 2024

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JENNY L. GRIFFIN, CSR No. 3969 - RMR, CRR, CCRR, CRC

1 MR. SCHMIDT: Yeah.

2 BY MS. GOTWALS:

3 Q. So looking at the first slide here on the  
4 front, is that a current representation of the  
5 leadership staffing in data science?

6 A. No. Not current.

7 Q. How has it changed?

8 A. This here was a representation of one  
9 specific product group within Instagram, the  
10 communities product group. That has since  
11 disbanded. That was about -- it disbanded about  
12 nine months ago. My role has changed since.

13 Q. So who -- to whom do you report now?

14 A. Roberta Medri, M-E-D-R-I.

15 Q. And for how long did you report to [REDACTED]  
16 [REDACTED]? Am I saying that correctly?

17 A. You got that right. Yes. I would say  
18 approximately three years. I can't tell you for  
19 certain.

20 Q. Let's move to the third slide or the third  
21 page in the exhibit there.

22 So notwithstanding that the communities  
23 group was disbanded, is this a current  
24 representation of the ecosystems group?

25 A. No.

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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, DARIUS KILSTEIN, 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 December 31, 2024.

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JENNY L. GRIFFIN, CSR #3969

Certified Shorthand Reporter