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Exhibit C

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

PEOPLE OF THE STATE OF CALIFORNIA, et al., Plaintiffs, v. *META PLATFORMS, INC, and Instagram, LLC,* Defendants IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION THIS DOCUMENT RELATES TO: 4:23-cv-05448	MDL No. 3047 Case No. 4:23-cv-05448-YGR Judge: Hon. Yvonne Gonzalez Rogers Magistrate Judge: Hon. Peter H. Kang

CORRECTED TRIAL REPORT OF RYAN SHEATSLEY
MAY 6, 2026

various periods of time. Eighty percent (1,180,858) of checkpoints reach a decision within 45 days, 16% within 46 days to 6 months, 0.5% within 6 months to a year, and 3% (44,289) take longer than 1 year. During this time, the data corresponding to these users can be used by Meta for business purposes, such as improving its AI models. Moreover, my analysis shows the impact of various retention polices Meta has used, where Meta held the data of hundreds of thousands of accounts that were disabled for being underage for six months to a year before the deletion process was initiated.

1.8 OPINION 8 – MANY UNDERAGE USERS COULD HAVE BEEN REMOVED FROM META'S PLATFORMS VIA HARD-LINKING AND SOFT-MATCHING

8. Analysis of Meta's data productions show that greater than 300,000 enforcements are due to hard-linking (where users explicitly link their accounts through Account Centre). Within the periods covered by data provided, I estimate that up to 100,000 additional accounts would have been removed due to propagation of enforcements via hard-linking if Meta's hard-link propagation system would have been implemented/fixed in the past. Moreover, my analysis of Meta's soft-match data (which describes the likelihood that two accounts are owned by the same user) provides estimates that Meta could have disabled tens of thousands of additional underage accounts on Facebook and Instagram that were soft-matched to accounts that were disabled for being underage. Over a 90-day period, I found tens of

thousands of accounts that were soft-matched to accounts that were disabled for being underage. While Meta does not use soft-matching to disable underage accounts, Meta has been using soft-matching for disabling accounts for other types of policy violations, as well as using soft-matching for other commercial purposes, for years.

2 INTRODUCTION

2.1 QUALIFICATIONS AND EXPERIENCE

9. My relevant qualifications are summarized here and provided in more detail in my curriculum vitae, which is attached as **Appendix A** to this report. This appendix also includes a list of my publications in the past ten years.

10. I earned a Ph.D. in Computer Sciences from the Department of Computer Sciences at the University of Wisconsin, Madison in 2024. I earned a Master of Science degree in Computer Science and Engineering and a Bachelor of Science degree in Computer Engineering from the Pennsylvania State University in 2018 and 2015, respectively.

11. From 2014-2018, I spent my summers as a research scientist for the United States Army Research Laboratory (ARL) in the Tactical Network Assurance Branch. My responsibilities at ARL included performing fundamental research on the security of computer networks and serving as team lead on associated projects.

Table	SURF Checkpoints	SURF Checkpointing Rate	Contact Form Checkpoints	Contact Form Checkpointing Rate
Table 1	7,642	5.9%	12,762	10.1%
Table 1 (Potential US)	28,803	4.8%	35,017	4.2%
Table 2	10,091	2.7%	[redacted]	

Table 11 – Number of SURF vs Contact Form "IG Underage" Checkpoints

91. For the second approach, the table below shows the number of reports (and checkpointing rate) that had the value "True" for "is_violating_decision" across both SURF and contact form submissions with a second table showing the distribution between the two.

Table	Violating Decisions	Violating Decision Rate
Table 1	20,677	8.1%
Table 1 (Potential US)	68,304	4.8%

Table 12 - Number of Violating Decisions

Table	SURF Violating Decisions	SURF Violating Decision Rate	Contact Form Violating Decisions	Contact Form Violating Decision Rate
Table 1	7,783	6.0%	12,894	10.2%
Table 1 (Potential US)	28,942	4.8%	39,362	4.7%

Table 13 - Number of SURF vs Contact Form Violating Decisions

92. From my analysis above, I observe that these results are consistent with Meta's finding showing that SURF results in a large increase in report submissions (given that the number of reports between SURF and contact forms are roughly equal, even though I understand SURF is deployed to a small percentage of users) with roughly half the checkpointing rate.[169] A reasonable inference here is that if Meta decided to expand SURF, it would be a valuable tool for increasing the number of underage users whose accounts are detected and checkpointed. Notably, across both SURF and contact forms,

[169] META3047MDL-190-00001439.

the number of reports that eventually result in checkpoints is small (in that ~90% of reports are ignored either via automations or human review).

93. Moreover, I have conducted a further analysis by ensuring reports are filed after March 22, 2022[170] and that the reports are only for Instagram[171] (which I filter for the value "Instagram" using the field "app_name" in Table 1 and field "platform" in Table 2). Below are the same three tables above, but with these filters applied.

Table	SURF Reports	Contact Form Reports
Table 1	128,473 (50.4%)	126,634 (49.6%)
Table 1 (Potential US)	20,824 (15.5%)	113,846 (84.5%)
Table 2	229,924 (100.0%)	
Total	379,221 (61.2%)	240,480 (38.8%)

Table 14 - Number of SURF vs Contact Form Reports (Second Analysis)

Table	SURF Checkpoints	SURF Checkpointing Rate	Contact Form Checkpoints	Contact Form Checkpointing Rate
Table 1	7,620	5.9%	12,761	10.1%
Table 1 (Potential US)	644	3.1%	22,440	19.7%
Table 2	7,487	3.3%		

Table 15 Number of SURF vs Contact Form "IG Underage" Checkpoint (Second Analysis)

Table	Violating Decisions	Violating Decision Rate
Table 1	20,654	8.1%
Table 1 (Potential US)	23,130	17.2%

Table 16 - Number of Violating Decisions (Second Analysis)

Table	SURF Violating Decisions	SURF Violating Decision Rate	Contact Form Violating Decisions	Contact Form Violating Decision Rate
Table 1	7,761	6.0%	12,893	10.2%
Table 1 (Potential US)	652	3.1%	22,478	19.7%

Table 17 - Number of SURF vs Contact Form Violating Decisions (Second Analysis)

[170] This is the date on which Meta began testing SURF on Instagram. META3047MDL-203-00213889.
[171] One of Meta's 30(b)(6) witnesses stated that SURF has only been tested on Instagram. Hartnett Dep. 123:7-124:1.

2024-11-01	25,742	173	287	242
2024-12-01	24,117	162	269	227
2025-01-01	19,016	127	212	179
2025-02-01	11,987	80	133	113
2025-03-01	3,592	24	40	33
Total	3,093,427	20,749	34,538	29,141

Table 63 - Estimated Number of Enforcements Due to Soft-matching per Month

200. This analysis represents an estimate of the magnitude of additional underage accounts that Meta could have detected by using its soft-matching techniques over the period for which Meta had produced data on underage enforcements. Based on the available data, I estimate that Meta could have detected tens of thousands of additional underage accounts on Facebook and Instagram, if it had queried its soft-matching data, as has done for years for disabling accounts for other types of policy violations or for commercial purposes.

The undersigned hereby certifies their understanding that they owe a primary and overriding duty of candor and professional integrity to help the Court on matters within their expertise and in all submissions to, or testimony before, the Court. The undersigned further certifies that their report and opinions are not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation.

Dr. Ryan Sheatsley