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Exhibit L

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Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION/)
PERSONAL INJURY PRODUCTS) MDL No. 3047
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.
-----) 22STCV21355

This Document Relates To)

STATE OF TENNESSEE, ex rel.)
JONATHAN SKRMETTI,)
ATTORNEY GENERAL and)
REPORTER,)
v.)
META PLATFORMS, INC., and)
INSTAGRAM, LLC.)
-----)

CONFIDENTIAL - ATTORNEYS' EYES ONLY
PURSUANT TO PROTECTIVE ORDER
VIDEO-RECORDED

DEPOSITION OF ALISON LEE, Ph.D.
(Pages 1 - 465)

Covington & Burling
415 Mission Street, San Francisco, California
Thursday, February 6, 2025, 9:19 a.m.

- - - -

REPORTED BY: ELAINA BULDA-JONES, CSR 11720

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1 didn't go in thinking that I was going to change,
2 like -- like, I don't think my ego would have been
3 that big for me to expect that I would have changed
4 the entire organization.

5 But I had hoped that the research that I
6 had -- would have had, joined a larger course of
7 voices that would have galvanized towards change.
8 And I think that was partially realized, but not
9 fully realized in the way that I had hoped.

10 Q. Okay. I think we're going to have a
11 chance to talk about that a bit today.

12 But before we do, can you tell me which
13 positions you held during your tenure at Instagram?

14 A. Yep. So I was a senior UX researcher
15 focused on relevance integrity.

16 (Whereupon, a brief discussion off the
17 record.)

18 THE WITNESS: It -- I can explain what
19 that means in a moment.

20 I was there from March 2021 until
21 May 2022. That title did not change, despite some
22 reorganizations that were happening. So I had
23 shifted from being on the relevance team, which is
24 the Feed team at Instagram, from March until maybe
25 September or October. And then around October,

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1 there was a massive reorganization, where anybody
2 who touched trust and safety and integrity were then
3 reorganized under an umbrella trust and safety and
4 social impact pillar.

5 My title didn't change during that time,
6 but the structure of where I sat changed.

7 After that, I joined the central Meta
8 responsible AI team, also as a senior researcher.
9 That happened from June to December of 2022.

10 BY MR. DUNBAR:

11 Q. Can you help me understand the skills you
12 believe you brought to your role at Instagram?

13 A. Aside from the expected skills that are
14 required for a mixed-methods researcher at that
15 level, so I was expected to deploy both quantitative
16 and qualitative methods to answer critical questions
17 around my area of focus. I was expected to
18 formulate those research questions myself, to
19 execute that, and to also translate those research
20 insights into actionable recommendations to either a
21 product team or specific engineers on my team or to
22 larger organizational wide sort of recommendations
23 for what we would do in response to that research.

24 I think that's expected for anybody at the
25 senior researcher level. I think -- on top of that,

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1 icon that looks like a magnifying glass, that's
2 called Explore. It's where you go to search for new
3 content. In that -- it is called the Explore tab.
4 And in the Explore tab, you will see both Reels and
5 normal posts interspersed throughout that. And
6 that's another surface.

7 Q. Okay. So you just mentioned Reels as one
8 of the surfaces that one might use on Instagram.
9 Can you just explain the Reels surface in layman's
10 terms?

11 A. Yeah, the Reels -- Reels is a type of
12 content actually.

13 Q. Okay.

14 A. And Reels can be entered into many
15 multiple surfaces, right. You can inject it into
16 the in-feed recs. You can inject that into the
17 Explore. And there's actually a separate -- there
18 was, at one point -- I keep forgetting whether they
19 took that away or they brought it back. There was,
20 at one point, a Reels tab unto itself. That's
21 another surface.

22 Q. Okay.

23 A. At the time in 2021, it was a -- the
24 newest product that Instagram had launched. And
25 they had hired me specifically to conduct Reels

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1 integrity and safety research because it was such a
2 new product. They were building fast. There were
3 clear market competitive motivations to build that
4 product fast and make it as compelling as possible.

5 And I was a -- prior to me, there was only
6 one other integrity researcher on the relevance
7 integrity team. And so they actually hired me on to
8 focus specifically on Reels integrity. Because at
9 that point the product had existed for maybe a year,
10 not even. And they were just starting to dig into,
11 okay, how do we make sure that this is a safe
12 product.

13 Q. I'm going to hand you a document which
14 will be Exhibit 2.

15 (Whereupon, Meta-Lee Exhibit 2 was marked
16 for identification.)

17 BY MR. DUNBAR:

18 Q. Please feel free to take a moment to
19 familiarize yourself. If it's helpful, I'm
20 introducing the exhibit just for the title and the
21 date.

22 Ready?

23 A. Yeah.

24 Q. Okay. Does this appear to be an article
25 from Meta's website titled "Introducing Instagram

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1 Q. Okay. Now, why were Reels integrities
2 issues of interest to you?

3 MS. BARNHART: Object to form.

4 THE WITNESS: I wouldn't say that Reels
5 was especially that interesting to me. It was
6 assigned to me, and they were, like, you are an
7 integrity researcher now, we really need someone to
8 work on Reels, and you are going to be that person.
9 That is your assignment.

10 I think as a content type, and from a
11 professional standpoint, given that Reels was a
12 brand-new content type, and that it was an
13 organizational priority, that made it compelling as,
14 oh, this is kind of a cool new thing to work on.

15 I think it was also important that there
16 was somebody who was focusing specifically on safety
17 and integrity of a product when the entire company
18 was launching everything they had again -- to try to
19 build the sexiest Reels product, right. And so I
20 think in that way, it felt important that somebody
21 on the integrity team was also working on the safety
22 side of Reels.

23 BY MR. DUNBAR:

24 Q. Were Reels gaining popularity with teens
25 on Instagram at that time?

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1 Instagram, is it fair to say that you learned Reels
2 posted by young users were distributed by Instagram
3 in ways those young users would not prefer?

4 MS. BARNHART: Object to the form.
5 Foundation.

6 THE WITNESS: I think that were true in
7 general, that there were content that was being
8 distributed on Reels that were reaching audiences
9 that users did not intend as original audience. And
10 we also conducted research that showed that young
11 people had a preferred audience that they wished to
12 reach.

13 And there was also research that suggested
14 that particularly young women who were producing
15 content on Reels were experiencing unwanted
16 interactions as a result of their content being
17 shown to people that they did not wish to have it be
18 shown to.

19 BY MR. DUNBAR:

20 Q. Do you know how that happened?

21 MS. BARNHART: Object to the form. Calls
22 for a narrative.

23 THE WITNESS: It would happen the way that
24 any other Reel would be distributed to a public
25 audience, which is that it was sourced from the

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1 billions of posts that are created every day and
2 then shown and recommended to users on the basis of
3 what a -- any particular user's preferences are --
4 or detected preferences are, right. And we use that
5 through the user signal.

6 So, for example, Chris, if you're really
7 into bikes, we would try to know that through your
8 user interactions and preference signals. So if you
9 follow a lot of bike content, if you like, share,
10 DM, do all of these user signals, we would use those
11 signals to recommend content that you have engaged
12 with previously.

13 BY MR. DUNBAR:

14 Q. Okay. So, in other words, were
15 Instagram's algorithms delivering young users' Reels
16 to people those young users were not connected to?

17 MS. BARNHART: Object to the form.
18 Foundation.

19 THE WITNESS: Yes.

20 BY MR. DUNBAR:

21 Q. And did that distribution sometimes
22 endanger those young users?

23 MS. BARNHART: Object to the form.
24 Foundation.

25 THE WITNESS: I think I would like to

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1 particular subsurface, it's basically when you click
2 on -- before you click on a video, there's, like, a
3 static image and a lot of times people would put
4 sexually suggestive content or really sensational,
5 like clickbait-y covers. So we saw that was a
6 subsurface that was problematic.

7 In-feed unit, what we called RIFU, Reels
8 in-feed unit, that's what was being injected into
9 people's feed, that was also a different -- that's a
10 completely different ranking model, right. So
11 that's what -- that might be one way that I meant
12 around tuning ranking models. Is there ways that,
13 if we know a particular subsurfaces are riskier than
14 others, can we do some tuning to the riskier models,
15 right.

16 And the second connected piece here is
17 this idea of focus on entertainment and mimicry and
18 the teen audiences. And if you remember, Reels is
19 basically Instagram's version of TikTok. And so at
20 the time, everybody was locked up inside and doing
21 TikTok dances. We're doing these, like, silly
22 trends. And many of those trends are very benign,
23 right. And those trends are oftentimes -- once it
24 goes viral, everybody's producing those videos at a
25 higher rate.

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1 worked with them on the solutions for further
2 investigation. And then -- what was the -- we
3 called it escalations, yeah, internal escalation.

4 BY MS. BARNHART:

5 Q. Am I correct, though, that the primary
6 focus of your integrity work at Instagram was on
7 non-recommendable content?

8 MR. DUNBAR: Same objection.

9 THE WITNESS: Yes, that's right.

10 BY MS. BARNHART:

11 Q. Okay. And at various points during your
12 testimony today, you've referred to harm that you
13 were working to mitigate and prevent while at
14 Instagram.

15 By "harm," were you referring to
16 non-recommendable content?

17 MR. DUNBAR: Object to form.

18 THE WITNESS: It is exposure to
19 undesirable content that produces undesirable
20 experiences for users. Most often, we -- the
21 original focus was non-recommendable content, but as
22 you saw in some of the research, sometimes that
23 content came from content that was considered benign
24 by our policies but harmful by users.

25 ///

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1 harm.

2 BY MS. BARNHART:

3 Q. Okay. And, again, just to be clear, when
4 we are talking about content, we are talking about
5 content that Instagram users have created and posted
6 on the app?

7 MR. DUNBAR: Object to form.

8 THE WITNESS: Yes, that's correct.

9 BY MS. BARNHART:

10 Q. So just want to be clear, we're talking
11 about content created by third parties, not content
12 created by Instagram?

13 MR. DUNBAR: Same objection.

14 THE WITNESS: Content that's created by
15 third parties on the platform hosted by Instagram.

16 BY MS. BARNHART:

17 Q. And like you said, Instagram has developed
18 various policies regarding certain types of content
19 and whether they are or are not allowed on the
20 platform, correct?

21 MR. DUNBAR: Same objection.

22 THE WITNESS: Yes, that's right.

23 BY MS. BARNHART:

24 Q. And that includes non-recommendable
25 content policies, which are policies about content

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1 major change I think would best serve users, what
2 would be the strategic path to getting IG there in
3 the long term? What are the steps on the road, who
4 needs to buy in, how" -- "how we might plug into
5 systems to get that change to happen at scale?"

6 Did I read that correctly?

7 A. Yes, you read that correctly.

8 Q. Okay. You can put that aside.

9 Do you recall Mr. Dunbar asking you
10 questions about the BEEF survey and the TRIPS
11 survey?

12 A. Yes, I do recall that.

13 Q. Okay. So let's start with BEEFs.

14 You did not conduct the BEEF survey,
15 correct?

16 A. I did not personally conduct that.

17 Q. You did not write the survey questions,
18 right?

19 A. I did not write the survey questions,
20 correct.

21 Q. You did not author the slide deck that
22 Mr. Dunbar showed you as Exhibit 25, correct?

23 A. No, I did not.

24 Q. You did not prepare the data tables in
25 that deck that Mr. Dunbar asked you questions about,

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1 correct?

2 A. I did not.

3 Q. You did not analyze any of the data that
4 was shown in those tables in that deck, correct?

5 A. No, I did not.

6 Q. You don't know -- you don't have personal,
7 detailed knowledge of the methodology used to
8 conduct the BEEF survey, correct?

9 A. I likely had some more sophisticated
10 understanding of the methodology than most at the
11 time because I learned a lot from collaborating with
12 Kyle. And I also replicated the BEEF survey to a
13 real specific one called the PRISM survey. So I
14 actually replicated a lot of his methodologies.

15 Q. Okay. When Mr. Dunbar was asking you
16 questions about Mr. Andrews's slide deck earlier, in
17 your testimony, you listed a number of questions
18 that you would need to have answered in order to
19 interpret the data.

20 Am I remembering that correctly?

21 A. Can you reiterate --

22 MR. DUNBAR: Object to form.
23 Characterization.

24 THE WITNESS: -- those questions?

25 ///

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1 BY MS. BARNHART:

2 Q. When Mr. Dunbar was -- sorry. Ask my
3 question again?

4 A. Can you reiterate -- you mentioned that I
5 had named a number of questions for -- that I'd need
6 to ask. I don't recall them. Can you reiterate
7 them to me?

8 Q. Well, I don't think we have time, given
9 Mr. Dunbar's admonitions to me, to go back through
10 all of those.

11 So you don't -- sitting here right now,
12 you don't recall, a few hours ago, naming several
13 questions that you would need to have answered in
14 order to properly interpret the BEEF's data?

15 MR. DUNBAR: Object to form. And
16 characterization.

17 THE WITNESS: I don't think that's an
18 accurate characterization of what was happening
19 during that time. I think I interpreted that data
20 live. And I named that -- the follow-up questions I
21 would have as a researcher from those tables.

22 BY MS. BARNHART:

23 Q. Yeah. You weren't -- so that's what I
24 want to be clear on.

25 You were interpreting that data on the

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1 fly, correct?

2 A. I was --

3 MR. DUNBAR: Object to form. And
4 characterization.

5 THE WITNESS: I was interpret --
6 revisiting that data after multiple years of not
7 having seen it. Although I have seen it before.
8 And the questions that I asked were through the lens
9 of a researcher of what would I do as follow-up
10 research, not questions that were calling into
11 question the integrity of the research itself.

12 MS. BARNHART: All right. We'll let the
13 record sit on that.

14 BY MS. BARNHART:

15 Q. You don't have personal knowledge of how
16 the data in the BEEF survey was weighted, correct?

17 A. I did not do the --

18 MR. DUNBAR: Object to form.
19 Characterization.

20 THE WITNESS: I did not do the weighting
21 myself.

22 BY MS. BARNHART:

23 Q. And you don't know, sitting here today,
24 that the sample used for the BEEF survey was, in
25 fact, representative of the broader Instagram

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1 STATE OF CALIFORNIA)

2 COUNTY OF YOLO)

3 I, ELAINA BULDA-JONES, a Certified Shorthand
4 Reporter of the State of California, duly authorized
5 to administer oaths pursuant to Section 2025 of the
6 California Code of Civil Procedure, do hereby
7 certify that

8 ALISON LEE, Ph.D.,
9 the witness in the foregoing deposition, was by me
10 duly sworn to testify the truth, the whole truth and
11 nothing but the truth in the within-entitled cause;
12 that said testimony of said witness was reported by
13 me, a disinterested person, and was thereafter
14 transcribed under my direction into typewriting and
15 is a true and correct transcription of said
16 proceedings.

17 I further certify that I am not of counsel or
18 attorney for either or any of the parties in the
19 foregoing deposition and caption named, nor in any
20 way interested in the outcome of the cause named in
21 said deposition dated the _____ day of
22 _____, 2025.

23
24 

25 ELAINA BULDA-JONES, CSR 11720