

EXHIBIT 71

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA) Case No. 4:22-MD-03047-YGR
ADOLESCENT ADDICTION/)
PERSONAL INJURY PRODUCTS) MDL No. 3047
LIABILITY LITIGATION)
_____)
THIS DOCUMENT RELATES TO)
ALL ACTIONS)

MONDAY, JUNE 9, 2025

CONFIDENTIAL - ATTORNEYS' EYES ONLY -
PURSUANT TO PROTECTIVE ORDER

— — —
Videotaped Rule 30(b)(6) Deposition of SAYED OTARU,
taken pursuant to notice and conducted at the offices of
Covington & Burling, LLP, 3000 El Camino Real 5, Palo Alto
Square, 10th Floor, Palo Alto, California, 94306, commencing
at 9:05 a.m., PDT, on the above date, before Jennifer A.
Dunn, Registered Merit Reporter, Certified Realtime
Reporter, California (#14461), Illinois & Texas Certified
Shorthand Reporter, and Missouri Certified Court Reporter.

Job No. MDLG 7414081

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1 it's higher, but I don't have the exact figure right now,
2 and I don't know what time period you're also looking at.

3 Can you clarify what time period you're looking
4 at?

5 Q Well, for example, as of today, what percentage of
6 teen accounts have a parent enrolled to supervise that
7 account?

8 A In the U.S.?

9 Q Yes.

10 A I don't have the exact number in front of me, but
11 I -- I -- yeah, I don't have the exact number in front of
12 me.

13 Q Can you give me an idea of about what that number
14 is?

15 A For today?

16 Q Yeah.

17 MR. EPPICH: Object to the form.

18 THE WITNESS: I don't have the exact number
19 for today.

20 BY MR. SLOTHOUBER:

21 Q Do you have a particular time period that you do
22 have an idea of about what that number is?

23 A What I can -- what I can share is for the period
24 between -- up through March of 2025, under 1 percent of teen
25 users predicted to reside in the U.S. were enrolled in

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1 Family Center supervision between November of 2023 and March
2 of 2025.

3 Q And is that number, .38 percent of the youth users
4 were enrolled in Family Center?

5 A That's the number I have for teen users in that
6 specific time period.

7 Q And then is it accurate that .15 percent of youth
8 users predicted to reside in the U.S. were enrolled in
9 supervision through the Family Center on Facebook during --
10 or up until -- between November and May of '25?

11 A .15 percent of teen users in -- predicted to
12 reside in the U.S. between November of 2024 and May of 2025,
13 were enrolled in supervision through Family Center on
14 Facebook.

15 Q Does Meta keep track of what percentage of teens
16 are enrolled in the time limit feature?

17 MR. EPPICH: Object to the form.

18 THE WITNESS: Meta understands what
19 percentage of teen users are using a time limit, a
20 daily time limit.

21 BY MR. SLOTHOUBER:

22 Q And what percentage of users are using the daily
23 time limit?

24 A In what time frame are you asking about?

25 Q Any time frame to which you know the answer.

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1 A Between January of 2023 and March of 2025, about
2 16 percent of teen users predicted to reside in the U.S. had
3 the daily limit enabled on Instagram.

4 Q So I'd like to talk about how some of those
5 measurements related to teen accounts and youth users are
6 used.

7 Let's introduce Exhibit 5, which has been marked
8 as JS6, the Project Nido, N-i-d-o Rollout Runbook.

9 (Meta-Otaru-5 marked for identification.)
10 BY MR. SLOTHOUBER:

11 Q Mr. Otaru, Project Nido, is that the development
12 name for teen accounts?

13 A I believe you're referring to Project Nido, and
14 Project Nido was the internal project name for the launch of
15 Instagram's teen accounts.

16 Q Taking a look there at Exhibit 5, the Rollout
17 Runbook.

18 Did that document continue to get updated during
19 the course of preparing for the Nido rollout?

20 A I just need a moment to understand what document
21 this was specifically.

22 Q Please do.

23 A Yes. This is, as it notes at the top, a
24 work-in-progress document. And this document, to answer
25 your question, was continuously updated and one of many

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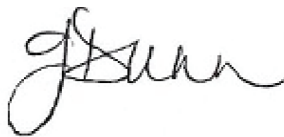
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CERTIFICATE

I, Jennifer A. Dunn, Certified Realtime Reporter, Registered Merit Reporter, California Certified Shorthand Reporter #14461, do hereby certify that prior to the commencement of the examination, SAYED OTARU, was duly remotely sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by me at the time, place and on the date hereinbefore set forth.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.



Certified Realtime Reporter

Registered Merit Reporter

CA Certified Shorthand Reporter #14461

Dated: June 10, 2025