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Exhibit N

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

COORDINATION PROCEEDING	)	JUDICIAL COUNCIL
SPECIAL	)	COORDINATION
TITLE [RULE 3.400]	)	PROCEEDING NO. 5255
SOCIAL MEDIA CASES	)	
-----	)	For Filing
	)	Purposes:
THIS DOCUMENT RELATES	)	22STCV21355
TO:	)	
	)	Judge: Hon.
Cristina Arlington	)	Carolyn B. Kuhl
Smith, et al., v. TikTok	)	SSC-12
Inc., et al.,	)	
Case No. 22STCV21355	)	
-----	)	

CROSS-NOTICES ON FOLLOWING PAGES

Tuesday, July 8, 2025

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Remote Video-Recorded Oral Deposition
of LOTTE RUBÆK, MSc, held at the location of
the witness, Copenhagen, Denmark, commencing
at 3:12 p.m. CEST on the above date, before
Michael E. Miller, Fellow of the Academy of
Professional Reporters, Certified Court
Reporter, Registered Diplomate Reporter, and
California CSR #13649.

--- --
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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT) MDL No.
ADDICTION/PERSONAL INJURY) 4:22-md-3047-YGR
PRODUCTS LIABILITY LITIGATION)
_____)

IN THE CIRCUIT COURT OF POLK COUNTY, ARKANSAS
CIVIL DIVISION

STATE OF ARKANSAS, ex rel.
TIM GRIFFIN, ATTORNEY GENERAL

v.

Case No. 57CV-23-47

META PLATFORMS, INC.; FACEBOOK HOLDINGS, LLC;
FACEBOOK OPERATIONS, LLC; META PAYMENTS INC.;
FACEBOOK TECHNOLOGIES, LLC; INSTAGRAM, LLC;
and SICULUS, INC.

COMMONWEALTH OF MASSACHUSETTS
SUFFOLK, ss SUPERIOR COURT
BUSINESS LITIGATION SESSION

COMMONWEALTH OF MASSACHUSETTS, |

Plaintiff, |

v. |

META PLATFORMS, INC. and
INSTAGRAM, LLC. |

Defendant. |

CIVIL ACTION NO.
2384CV02397-BLS1

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1 correct?

2 MS. KOUBA: Object to form.

3 A. No, that's not correct. It's
4 because the content does really affect the
5 user, but, in fact, it's the design of the
6 social media platforms that causes the
7 greatest effect on the behavior like
8 nonsuicidal self-injury, eating disorders,
9 and suicidal behavior, because before social
10 media, we still had the content because the
11 content would be the people walking around in
12 the classroom and the -- at sports.

13 But what social media do is
14 that they spread the content and that they
15 amplify the content and the social metrics of
16 the platform, they reinforce the behavior
17 through operant conditioning because specific
18 behavior is reinforced through the reactions
19 to behavior.

20 So if you post a deep cut, a
21 deep bloody cut and you get hundreds of
22 likes, then that behavior is reinforced, and
23 that is only due to the social -- the metrics
24 of the social media platform.

25 The same with the way the

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1 are inviting a longer answer to
2 attempt to answer that question, which
3 Ms. Rubæk has also been very patient
4 with all day in answering her
5 questions.

6 And I also object to that
7 question, object to form.

8 A. And...

9 BY MR. KENNEDY:

10 Q. So let me repeat my question.

11 A. Only black boxes as content?

12 Q. Yeah. Let me, just for the
13 record, let me repeat the question.

14 If Instagram worked exactly the
15 way Instagram works, but the only content on
16 Instagram were black boxes, would teenagers
17 using Instagram still have negative mental
18 health outcomes?

19 MS. KOUBA: Object to form.

20 A. I wouldn't know. I've never
21 seen how a platform -- that would depend on
22 the other mechanisms that platform was using,
23 but it would definitely not have the same
24 effect on teenagers.

25 ///

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1 BY MR. KENNEDY:

2 Q. Because the content in my
3 hypothetical would be different from the
4 content you're addressing in your opinions,
5 right? That's why there would be a different
6 effect on teenagers?

7 MS. KOUBA: Object to form.

8 A. The content -- if the content
9 is eating, thinspiration content, eating
10 disorder content and suicide -- content about
11 suicide and methods of self-injury and
12 content -- that is definitely different from
13 black boxes.

14 It is still -- the most
15 important thing to note here is the way that
16 the social media, that they are designed to
17 amplify that content and to reinforce a
18 behavior and the -- the features they use
19 such as beauty filters and so on.

20 So you can't -- yeah, I'm not
21 sure I answered your question, but
22 otherwise...

23 BY MR. KENNEDY:

24 Q. If a teenager uses Instagram
25 and Instagram serves eating disorder content,

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1 your view is that that would increase the
2 risk that the teenager would get an eating
3 disorder, right?

4 A. Yes.

5 MS. KOUBA: Object to form.

6 BY MR. KENNEDY:

7 Q. Now, if a teenager --

8 A. It is shown to affect teenagers
9 in that way.

10 Q. Now, if a teenager uses
11 Instagram, Instagram has exactly the same
12 features that it had in the eating disorder
13 example, but now Instagram is serving up NSSI
14 content, then your view is that that would
15 increase the risk the teenager would get
16 NSSI, right?

17 MS. KOUBA: Object to form.

18 A. Yes, that is also proven by
19 research.

20 BY MR. KENNEDY:

21 Q. So the only difference between
22 the two hypotheticals I just gave you is the
23 content, not the features of Instagram,
24 correct?

25 MS. KOUBA: Object to form.

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1 A. Yes, in the two that -- the
2 features on social media, they interact
3 around content. The only reason why they are
4 there, that is because of the content.

5 Instagram would want young
6 people to have much -- as much content in
7 their feed as possible about the subject that
8 they are occupied with at the exact moment to
9 make them -- yeah, to make them -- yeah,
10 their time on the platform, to increase that.
11 BY MR. KENNEDY:

12 Q. Now, in order to establish a
13 causal link between the features of a social
14 media platform and negative mental health
15 outcomes, you would need to design a study
16 that isolates the effect of the features of
17 the platform from the content on the
18 platform, correct?

19 MS. KOUBA: Object to form.

20 A. Yeah. For example, there's a
21 study which has looked at people who for the
22 past month tell that they have seen
23 self-harm, for example, self-harm images on
24 Instagram, and then it's at a later point in
25 time, they have started to self-harm.

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1 The group who has been exposed
2 to self-harm, they have started to self-harm
3 more often than the group who didn't watch
4 that kind of content.

5 BY MR. KENNEDY:

6 Q. Okay. I think we're talking
7 past each other a little bit.

8 A. Yeah, maybe we do.

9 Q. Yeah.

10 So in order to establish a
11 causal link between the features of a social
12 media platform as opposed to the content on
13 the platform, you would need to design a
14 study that isolates the effect of the
15 platform's features from the platform's
16 content, correct?

17 MS. KOUBA: Object to form.

18 A. I wouldn't say that is correct
19 because they are interconnected.

20 BY MR. KENNEDY:

21 Q. So the content of a social
22 media platform and the features of a social
23 media platform are interconnected --

24 A. Yes.

25 Q. -- such that any negative

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1 mental health outcomes for teenagers arising
2 from the platform are a result of both the
3 content and the features?

4 MS. KOUBA: Object to form.

5 BY MR. KENNEDY:

6 Q. That's your opinion, right?

7 A. Yes. The content and talking
8 about content, suicide, self-injury and
9 eating disorder content, that is not allowed
10 on the platform, so that -- if the platform
11 worked as they claim to do, then moderators
12 would have removed content like that. But it
13 still floats around the platform, yeah, to a
14 great -- to a great extent.

15 Q. In studying the effect of a
16 social media platform on teen mental health,
17 is it not possible to separate out the effect
18 of the platform's content and the platform's
19 features, correct?

20 MS. KOUBA: Object to form,
21 outside of scope.

22 A. The content of the platform is
23 a part of the platform. If we didn't have
24 that social media, a young person would never
25 lie on their bed scrolling through content

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CERTIFICATE

I, MICHAEL E. MILLER, Fellow of the Academy of Professional Reporters, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, LOTTE RUBÆK, MSc was duly 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 and before me at the time, place and on the date hereinbefore set forth, to the best of my ability.

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



MICHAEL E. MILLER, FAPR, RDR, CRR
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Dated: July 9, 2025