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Exhibit P

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION/)
PERSONAL INJURY PRODUCTS) MDL No. 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.
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 BRIAN BOLAND

APRIL 25, 2025

(Pages 1 - 422)

9:18 a.m. to 7:18 p.m.

Zuckerman Spaeder

2100 L Street, NW, Washington, DC 20037

Reported By: Amanda Blomstrom, RMR, CRR, and
CSR TX #8785/CA #12681/IL #84-3634

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1 compensation, direct salary, stock, ratings,
2 promotion, were tied to success metrics of their
3 products.

4 In defining what accounts for success, you
5 align those employees to chase that metric, to chase
6 that incentive; and that incentive was growth. And
7 growth means the number of people using that product,
8 the number of times they may post, the number of
9 times they may share, the number of videos that they
10 create.

11 Those metrics that lead to the number of
12 people using the product and how much engagement that
13 they have with the product would be the things that
14 determine a person's career.

15 I did not at my time see metrics around
16 trust and safety, around understanding the harms of
17 your product, and mitigating the harms of your
18 product, except for on the specific Trust and Safety
19 Teams, which is outside of each of those individual
20 product leaders and product areas who are responsible
21 for growth.

22 Q. To your knowledge, Mr. Boland, during your

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1 per-user revenue is not necessarily caused by user
2 activity, but that if you have a lot more activity on
3 the platform, you generate a lot more revenue from
4 that user activity.

5 In this case, talking about impression
6 counts, meaning how many stories, posts, videos, a
7 person would see on the platform.

8 Q. Does the company take efforts to increase
9 users' activity on the platform?

10 MR. GOLDFARB: Objection to form.

11 MR. SNEED: Object to form.

12 THE WITNESS: Yes.

13 BY MR. JANSSEN:

14 Q. In what ways, to your knowledge, does the
15 company do that?

16 A. By looking at ways that you could design
17 the layout of Facebook, how you would rank stories,
18 so ranking plays a significant role in how people
19 find the content on Facebook interesting to them.

20 Generally the more interesting that
21 content is -- and "interesting" applies very broadly
22 because some things that are rage-inducing can be

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1 interesting -- but as the algorithm can rank more
2 interesting content, then you can get people to share
3 more posts, click on them, comment, like, et cetera.

4 Q. You -- again, your answer, by saying that
5 the design of the layout of Facebook could increase
6 user activity on the application, what did you mean
7 by the design of the layout of Facebook?

8 MR. SNEED: Object to form.

9 THE WITNESS: There is a lot of work that
10 you can do in how you change all aspects of a post or
11 a story, including the way that you represent the
12 title of a post, including the way that you show
13 whether people have engaged with that post, including
14 minor things like the color shading behind the post.
15 All of those changes, and countless more, can impact
16 the way that people engage with content on Facebook-
17 style platforms.

18 BY MR. JANSSEN:

19 Q. Are you aware of any other things that
20 the company may do to increase user activity on the
21 platform?

22 MR. GOLDFARB: Objection to form.

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1 deeply concerned that Mark Zuckerberg and Meta's
2 leadership weren't serious about addressing the harm
3 created on their platform. Over time, it became
4 clear to me that Facebook's priorities were growth
5 and power, not the safety or well-being of its
6 users."

7 Did I read that correctly?

8 A. You did.

9 Q. And you've testified over the course of
10 today's examination as to why it became clear to you
11 that Facebook's priorities were growth and power, not
12 the safety or well-being of its users, correct?

13 A. That is correct.

14 Q. And then, in the next paragraph, you write
15 in your blog post, "I didn't plan to become a public
16 critic when I left the company. Leadership dismissed
17 my concerns, and I second-guessed myself until
18 January 6, 2021."

19 Did I read that correctly?

20 A. You did.

21 Q. You referenced that leadership dismissed
22 your concerns. What concerns did you convey to

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1 Q. Is it your understanding, sitting here
2 today, that the company is dodging accountability for
3 teen mental health harms related to Instagram use?

4 MR. SNEED: Object to form and foundation.

5 MR. GOLDFARB: Object to form.

6 THE WITNESS: To my knowledge, I don't
7 believe that they have tried hard or potentially
8 tried beyond the most minimal amount to understand
9 whether they're harmful to teen mental health.
10 BY MR. JANSSEN:

11 Q. Moving down in your blog post. You write,
12 "A Pattern of Neglect and Harm. The latest news that
13 Meta is ending its fact-checking program and scaling
14 back user protections is the final straw for me.
15 This is the same company whose platform contributed
16 to genocide in Myanmar, harmed teenage users and
17 enabled political and racial polarization across the
18 globe. Instead of addressing these harms, Meta
19 consistently prioritizes growth over public safety."

20 Did I read that correctly?

21 A. You did.

22 Q. And then, if you look at the last sentence

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1 is all bad, do you?

2 A. I do not.

3 Q. And I think you've written and spoken
4 about the benefits of social media in connecting
5 people and supporting people and giving them a voice;
6 is that right?

7 A. That is correct.

8 Q. And is it fair to say too that you don't
9 think that the benefits of Facebook and social media
10 erase the harms that come with it?

11 MR. GOLDFARB: Objection to form.

12 MR. SNEED: Object to form.

13 MR. GOLDFARB: You may answer.

14 THE WITNESS: I don't believe so. I think
15 that the harms are -- the harms are significant
16 enough that we should fix them.

17 BY MS. SINGER:

18 Q. And do you believe, as a former senior
19 executive at Facebook, that the harms from Facebook
20 were worsened by choices Facebook made about its
21 growth, its priorities, its incentives, and its
22 transparency?

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1 MR. GOLDFARB: Objection to form.

2 MR. SNEED: Object to form.

3 THE WITNESS: I believe that.

4 BY MS. SINGER:

5 Q. And can you explain that, in your own
6 words?

7 MR. SNEED: Object to form.

8 THE WITNESS: I believe that, over the
9 course of my time at the company, I saw opportunities
10 for Mark Zuckerberg to make decisions based on
11 concerning information that he was seeing that he
12 could invest more in safety measures or at least
13 understanding the potential harms.

14 One of the things I've been very clear
15 about in my earlier testimony to the Senate but maybe
16 am less neutral today, is that at the time I said
17 that, I don't know, I'm not sure whether it's
18 harmful, because no one has given us the ability to
19 find out.

20 And Mark has had ample opportunity, ample
21 opportunity to invest in finding out, and has had
22 ample opportunities to see concerning research that

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1 would make the average person want to look; and, in
2 my experience, didn't see him invest in looking. And
3 if you don't invest in fixing it, if you don't invest
4 in understanding it, then it's certainly not getting
5 better. And it feels to me, because I've listened to
6 more activists and more concerned global parties,
7 that they don't feel like it's getting better.

8 And so that leaves me in a state where I
9 feel like it's not on a path to improvement, and his
10 announcements in January to really curtail, not just
11 the fact-checking, but the kinds of basic protections
12 that the platform was offering is a really bad step
13 for anyone, everyone on the platform.

14 MS. SINGER: Thank you. I have nothing
15 further.

16 MR. GOLDFARB: You want to go off the
17 record?

18 MR. SNEED: Yes.

19 THE VIDEOGRAPHER: Okay. The time is
20 4:31 p.m.

21 We are now off the record.

22 (Recess taken.)

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1 A. Correct.

2 MR. GOLDFARB: Objection to form.

3 BY MR. SNEED:

4 Q. Now, in fact, you weren't on any team that
5 was devoted to or focused on working on safety,
6 right?

7 A. That's correct.

8 Q. You also were not a part of any research
9 team when you were at Facebook, correct?

10 MR. GOLDFARB: Objection to form.

11 THE WITNESS: That's correct.

12 BY MR. SNEED:

13 Q. And so it would be fair to say that, in
14 your work at Facebook, you didn't do any work on
15 youth well-being, right?

16 A. That is correct.

17 Q. You never worked on the community
18 standards during the time you were at Facebook; is
19 that right?

20 MR. GOLDFARB: Objection to form;
21 foundation.

22 THE WITNESS: That is correct.

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1 Q. You were not a part of the headcount and
2 resourcing proposals or discussions when it came to
3 youth safety, for example, correct?

4 A. That's correct.

5 Q. So you wouldn't be able to say how many
6 employees, whether engineers or otherwise, were
7 allocated in 2018 to youth well-being, correct?

8 MR. JANSSEN: Objection to form.

9 THE WITNESS: That's correct.

10 BY MR. SNEED:

11 Q. At no stage during your time at Facebook
12 would you be able to say how many employees were
13 devoted to working on youth well-being, correct?

14 A. That's correct.

15 Q. In addition, you wouldn't be able to say,
16 throughout your time at Facebook, how much Facebook
17 was spending on youth well-being efforts at the
18 company, correct?

19 MR. JANSSEN: Objection to form.

20 MR. GOLDFARB: Objection to form.

21 THE WITNESS: That's correct.

22 BY MR. SNEED:

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1 Q. You weren't involved in any efforts
2 related to child safety during the time that you
3 were at Facebook, correct?

4 A. That's correct.

5 Q. Are you familiar with NCMEC? Do you know
6 that organization?

7 A. I recall that acronym, but I don't
8 remember the details of it.

9 Q. And -- and for -- it's the National Center
10 for Missing & Exploited Children. Okay. Do you
11 understand that?

12 A. I do.

13 Q. Nothing about your work related to the
14 work that NCMEC was doing, right?

15 A. That is correct.

16 Q. There were other teams that were at
17 Facebook, and subsequently Meta, that ultimately
18 handled that type of work, correct?

19 MR. JANSSEN: Objection to form;
20 foundation.

21 THE WITNESS: That's correct.

22 BY MR. SNEED:

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1 at when you were at Facebook related to polarization
2 and election integrity; is that right?

3 A. Election integrity and polarization
4 broadly.

5 Q. And that research is what had you
6 concerned about the impact of Facebook on its users;
7 is that right?

8 A. That's correct.

9 Q. And you don't recall at any time when you
10 were at Facebook looking at research related to teen
11 mental health, correct?

12 A. That's correct.

13 Q. The first time that you looked at any
14 research related to teen mental health, I believe you
15 testified, was in relation to the Haugen leaks; is
16 that right?

17 A. That's correct.

18 Q. And after the Haugen leaks, did you see or
19 review Meta's research response to what had been
20 leaked?

21 MR. JANSSEN: Objection to form;
22 foundation.

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REPORTER'S CERTIFICATION
DEPOSITION OF BRIAN BOLAND

APRIL 25, 2025

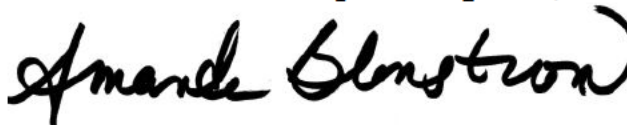
I, Amanda Blomstrom, a Notary Public in and for
the District of Columbia, hereby certify to the
following:

That the witness, BRIAN BOLAND, was duly sworn
by the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

That the deposition transcript was submitted to
the witness or to the attorney for the witness for
examination and signature;

I further certify that I am neither counsel for,
related to, nor employed by any of the parties or
attorneys in the action in which this proceeding was
taken, and further that I am not financially or
otherwise interested in the outcome of the action.

Certified to by me this 29th day of April, 2025.



Amanda Blomstrom, CRR, RMR, CLR
Texas CSR No. 8785
California CSR No. 12681
Illinois CSR No. 84-3634