

Filed Under Seal

Exhibit R

Page 1

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, )  
\_\_\_\_\_)

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES  
SPRING STREET COURTHOUSE

COORDINATION PROCEEDING ) Lead Case No. for  
SPECIAL TITLE [RULE 3.400] ) for Filing Purposes  
SOCIAL MEDIA CASES ) 22STCV21355  
\_\_\_\_\_)

This Document Relates to: )  
)

STATE OF TENNESSEE, ex rel. )  
JONATHAN SKRMETTI, ATTORNEY )

GENERAL and REPORTER ) Case No.  
vs. ) 23-1364-IV

META PLATFORMS, INC., )  
and INSTAGRAM, LLC, )  
\_\_\_\_\_)

VIDEOTAPED DEPOSITION OF NATALIE TROXEL, PH.D.  
Portland, Oregon  
Tuesday, March 11, 2025

Reported by: MARLA SHARP, RPR, CLR, CCRR, OR CSR  
17-0446, CA CSR 11924, WA CSR 3408  
Job No. 7225418

1 Q And you go on to say in the second  
2 paragraph:

3 "We have the chance to make sure  
4 Facebook, as a company and as a  
5 platform, develops and embodies those  
6 same prosocial orientations across  
7 it's [sic] lifespan."  
8 Do you see that?

9 A Yes.

10 Q Okay. So this quote was from 2019,  
11 relatively early in your time at Meta, correct?

12 A Yes.

13 Q And when you started at Meta, did you  
14 believe that your work on the various integrity  
15 teams that you worked on could be a meaningful  
16 continuation of your academic work?

17 MR. EPPICH: Object to form.

18 THE WITNESS: Yeah, I hoped it would.

19 BY MS. WALSH:

20 Q Okay. When you started your work at Meta,  
21 did you believe that the company could help promote  
22 principles of empathy, compassion, and altruism?

23 MR. EPPICH: Object to form.

24 THE WITNESS: Yeah, I thought it was  
25 possible.

1 BY MS. WALSH:

2 Q And did that turn out to be the case?

3 MR. EPPICH: Object to form.

4 THE WITNESS: In my opinion, no.

5 BY MS. WALSH:

6 Q Okay. Can you give us an example of how  
7 that belief you had at the beginning turned out not  
8 to be the case?

9 A Can you repeat the --

10 Q Sure. Can you give us an example of how  
11 the belief that you had at the beginning of your  
12 time at Meta turned out not to be the case?

13 A Over my time there, I saw examples of Meta  
14 products being used for bad things in the world and  
15 in ways that the company didn't necessarily lock it  
16 down quickly enough or -- I don't want to say take  
17 it seriously enough because I don't know how  
18 seriously they did or didn't take it.

19 But ways in which their behavior didn't  
20 seem like they were taking products seriously  
21 enough.

22 Q Okay. And we'll talk about some further  
23 examples of that.

24 But do you have one to highlight for the  
25 jury now?

1 MR. EPPICH: Object to form.

2 THE WITNESS: Probably, but I'm not sure I  
3 specifically remember that.

4 BY MS. WALSH:

5 Q Okay. So you told the jury that a concern  
6 you had was that the infinite scroll feature of,  
7 say, Instagram could contribute to problematic use,  
8 correct?

9 A Yes.

10 MR. EPPICH: Object to form.

11 BY MS. WALSH:

12 Q And so were you involved in research about  
13 how -- about alternatives to infinite scroll?

14 A Yes.

15 Q And what were those alternatives?

16 A Primarily chronological feeds.

17 Q Okay. And would a chronological feed end  
18 at some point?

19 MR. EPPICH: Object to form, foundation.

20 THE WITNESS: I don't know if it would end.  
21 At some point, you would get caught up to the last  
22 thing you had seen or, like, to the -- yeah, to the  
23 last thing that you had seen on your previous  
24 session.

25 ///

1 that?

2 MR. EPPICH: Same objections.

3 THE WITNESS: I'm aware that there was some  
4 limited internal data that was shared to academic  
5 researchers, for example, under, like, really strict  
6 privacy rules and things like that so that outside  
7 researchers could do data analysis on, like,  
8 networking effects and things like that.

9 BY MS. WALSH:

10 Q Okay. Is it fair to say that your personal  
11 knowledge about that is pretty limited?

12 A Yes.

13 Q Okay. Let's go back to your frustrations  
14 about research within Meta.

15 Did you feel, based on your five years  
16 working in UX research at Meta, that the senior  
17 executives prioritize getting important research  
18 done?

19 MR. EPPICH: Objection. Form,  
20 characterization.

21 THE WITNESS: In my opinion, no.

22 BY MS. WALSH:

23 Q Okay. Can you give us an example of an  
24 area that you believed was important to research  
25 that wasn't prioritized?

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1 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

2 CASE: IN RE: SOCIAL MEDIA

ADOLESCENTADDICTION/PERSONAL INJURY PRODUCTS

3 LIABILITY LITIGATION

4 DEPOSITION DATE: MARCH 11, 2025

5 JOB NUMBER: 7225418

6 I, Marla Sharp, certified stenographic  
7 reporter licensed in California, Oregon, and  
8 Washington, hereby certify that the foregoing  
9 video-recorded videoconference deposition of  
10 NATALIE TROXEL, PH.D., was taken remotely before me  
11 on March 11, 2025; that the witness was remotely  
12 duly sworn by me; that all of the testimony,  
13 colloquy, and objections made were recorded  
14 stenographically by me and thereafter transcribed,  
15 said transcript being a true copy of my shorthand  
16 notes thereof; that review of the transcript was  
17 neither requested nor waived before completion of  
18 the deposition; ( ) that the witness has failed or  
19 refused to approve the transcript; and that I am  
20 neither financially interested in the action nor a  
21 relative or employee of any attorney of any party.

22 In witness whereof, I have subscribed my  
23 name and signature this date, March 21, 2025.

24

25



Marla Sharp, RPR, CLR, CCRR

CA CSR 11924, OR CSR 17-0446, WA CSR 3408