

Filed Under Seal

Exhibit S

PURSUANT TO PROTECTIVE ORDER

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION/PERSONAL)
INJURY PRODUCTS LIABILITY) MDL No. 3047
LITIGATION)
-----)
THIS DOCUMENT RELATES TO:)
ALL ACTIONS)

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

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

MONDAY, DECEMBER 16, 2024

CONFIDENTIAL - ATTORNEYS' EYES ONLY -
PURSUANT TO PROTECTIVE ORDER

- - -

Videotaped deposition of George
Volichenko, held at the offices of Lief
Cabraser Heimann & Bernstein, LLP, 275
Battery Street, 29th Floor, San Francisco,
California, commencing at 9:05 a.m. Pacific
Time, on the above date, before Carrie A.
Campbell, Registered Diplomat Reporter,
Certified Realtime Reporter, Illinois,
California & Texas Certified Shorthand
Reporter, Missouri, Kansas, Louisiana & New
Jersey Certified Court Reporter.

- - -

Job No. 7053449

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1 the data scientist that was before me was
2 also involved in that. Unfortunately, I
3 don't remember his name.

4 And then, you know, the rest of
5 the team is definitely there, so software
6 engineers, designer. There's a content --
7 was it content designer, which is like a
8 copywriter. There's a person who does kind
9 of qualitative research, like a UX
10 researcher.

11 For all those people, I can't
12 say for sure who was working on a project
13 because it was before my time.

14 Q. Are you familiar with the term
15 "p-NAC"?

16 A. Yes.

17 Q. What is p-NAC?

18 A. Yeah. p-NAC is -- so NAC
19 stands for negative appearance comparison.
20 p-NAC is basically probability. So P is
21 lowercase, which is often used in statistics
22 as, like, probability. You know, you've
23 heard of p-values also related to
24 probability.

25 So p-NAC was a model they

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1 developed on my team, and I think this guy
2 Justin, Justin Cheng, was, like, the main
3 kind of the -- the brain behind it. It was a
4 model that was scoring content, right, on how
5 likely it is to be associated with negative
6 appearance comparison.

7 So you could imagine, like, for
8 example, like, a picture of a Christmas tree,
9 low p-NAC. A picture of, like, some
10 beautiful girl in, like, a bikini, posing
11 would be potentially high p-NAC.

12 Q. Okay. And was the p-NAC
13 scoring model part of the solution that the
14 team proposed to address negative appearance
15 comparison?

16 A. Yes.

17 MR. CHAPUT: Object to form.
18 Foundation.

19 QUESTIONS BY MR. WARREN:

20 Q. Okay. Was that project subject
21 to a review process?

22 A. Yeah, absolutely, like every
23 other project.

24 Q. Okay. And what's your
25 understanding of that review process?

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1 Q. You didn't work on Instagram
2 well-being prior to 2022 when you started on
3 that team.

4 Correct?

5 A. Yes.

6 Q. Do you know when the Instagram
7 well-being team was originally created?

8 A. No.

9 Q. But it did exist when you
10 joined the company in 2022.

11 Right?

12 A. Yes.

13 Q. Okay. Your bachelor's and
14 master's degrees were in decision science and
15 statistics?

16 MR. WARREN: Objection to form.

17 THE WITNESS: My undergraduate
18 degree was in statistics and decision
19 science. My master's was in
20 statistical practice.

21 QUESTIONS BY MR. CHAPUT:

22 Q. Okay.

23 A. Yeah.

24 Q. You don't have any training in
25 psychology.

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1 Right?

2 MR. WARREN: Objection.

3 THE WITNESS: No.

4 QUESTIONS BY MR. CHAPUT:

5 Q. And you also don't have any
6 training in mental health?

7 A. No.

8 Q. Earlier today you testified
9 about a measurement you referred to as p-NAC.
10 Do you recall that?

11 A. Yes.

12 Q. Okay. Now, the p-NAC work that
13 you were describing happened on the IG
14 well-being team before you joined that team.
15 Correct?

16 A. Yes.

17 Q. So the p-NAC work that you were
18 describing is all work that you didn't
19 participate in.

20 Right?

21 MR. WARREN: Objection. Form.

22 THE WITNESS: No, I did not
23 actively participate in its
24 development, that's correct.

25

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1 QUESTIONS BY MR. CHAPUT:

2 Q. Okay. And you also didn't
3 participate in the discussions with
4 Mr. Mosseri that you were testifying about
5 earlier today.

6 Did you?

7 MR. WARREN: Objection.

8 THE WITNESS: That's correct,
9 yes.

10 QUESTIONS BY MR. CHAPUT:

11 Q. Okay. Have you ever personally
12 evaluated the strength or reliability of the
13 p-NAC metric?

14 MR. WARREN: Objection.

15 THE WITNESS: No, I have not.

16 QUESTIONS BY MR. CHAPUT:

17 Q. Earlier today you also
18 testified some about ad targeting.

19 Do you recall that testimony?

20 A. Yes.

21 Q. Okay. Do you know what
22 characteristics Meta allows advertisers to
23 use today to direct advertisements to teen
24 users?

25 MR. WARREN: Objection.

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CERTIFICATE

I, CARRIE A. CAMPBELL, Registered Diplomat Reporter, Certified Realtime Reporter and Certified Shorthand Reporter, do hereby certify that prior to the commencement of the examination, George Volichenko, 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 action.



CARRIE A. CAMPBELL,
NCRA Registered Diplomat Reporter
Certified Realtime Reporter
California Certified Shorthand
Reporter #13921
Missouri Certified Court Reporter #859
Illinois Certified Shorthand Reporter
#084-004229
Texas Certified Shorthand Reporter #9328
Kansas Certified Court Reporter #1715
New Jersey Certified Court Reporter
#30XI00242600
Louisiana Certified Court Reporter
#2021012
Notary Public
Dated: January 3, 2025