

Filed Under Seal

Exhibit U

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA

3 IN RE: SOCIAL MEDIA ADOLESCENT :MDL NO.
4 ADDICTION/PERSONAL INJURY PRODUCTS :4:22-MD-
5 LIABILITY LITIGATION :3047-YGR

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

9 COORDINATION PROCEEDING SPECIAL TITLE :
10 (RULE 3,400) :
11 :
12 SOCIAL MEDIA CASES :
13 :
14 :LEAD CASE
15 :NO. FOR
16 THIS DOCUMENT RELATES TO: :FILING
17 :PURPOSES
18 STATE OF TENNESSEE, ex rel, JONATHAN :22STCV21355
19 SKRMETTI, ATTORNEY GENERAL and :
20 REPORTER, :
21 :
22 V. :
23 :
24 META PLATFORMS, INC., and INSTAGRAM, :
25 LLC :
CASE NO. 23-1364-IV :

DEPOSITION UNDER VIDEO EXAMINATION OF
VAISHNAVI JAYAKUMAR
JANUARY 31, 2025
VOLUME II

Continued videotaped deposition of
VAISHNAVI JAYAKUMAR, taken pursuant to notice, was
held at the law offices of Baker Botts, LLP, 30
Rockefeller Plaza, New York, New York, beginning at
a.m., on the above date, before Michelle L. 8:34
Ridgway, a Registered Professional Reporter,
Certified Court Reporter (NJ-CCR # XI02126),
Certified Realtime Reporter, Certified Shorthand
Reporter (CA-CSR # 14592), and Notary Public.

1 figure out a way to mitigate the drop in growth,
2 right?

3 A. That's right. At that moment in
4 time, that's what was happening.

5 Q. And further down the road, were you
6 involved in the actual decisions about whether to
7 ship private by default?

8 A. Further down the road -- and this
9 was in 2020, when I had just joined the company.
10 So further down the road, I was informed that we
11 were not going to launch private by default as
12 intended because there would be concerns about the
13 drop -- about growth.

14 Q. Now, were you privy to all the data
15 that was looked at by the company when considering
16 this decision?

17 A. No.

18 Q. And would you defer to people who
19 were involved in the final decisionmaking process
20 on when and how private by default was launched?

21 A. What do you mean -- what do you
22 mean by would I defer to them?

23 Q. Would you defer in terms of what
24 was the reason for the decision?

25 A. I was told that the decision for

1 So the reference that you were
2 making to discussions with Boz -- with
3 Mr. Boswoth --

4 A. That took place while I was at the
5 company, but I was not part of that discussion.

6 Q. That was my question.

7 Were you involved in any way,
8 shape, or form with the discussions around the
9 decision as to whether to lift the ban or not?

10 A. I contributed in to all of the
11 analyses and documents that went up to him, but I
12 was not in the room with him.

13 Q. So you weren't in the meetings
14 where the decision was made?

15 A. No.

16 Q. And you were only told about the
17 decision after it had been made, correct?

18 A. Yes.

19 Q. Now let's go back to Exhibit 56.
20 Do you have 56 handy?

21 If you go to Page 30.

22 A. I don't see 56.

23 Q. It's the partial evaluation.

24 A. The partial evaluation.

25 Q. It's the last page of it that we

1 Q. Who made the ultimate decisions
2 about whether or not to launch safety features on
3 Instagram, your colleagues or leadership at Meta?

4 A. It depended on the potential impact
5 to engagement or growth. Where there was not any
6 significant impact, the decisions were typically
7 made at the working level, perhaps one level above.
8 But where there was any sort of impact, engagement,
9 or growth, it very quickly escalated out of our
10 hands into the hands of senior leadership.

11 Q. So even if you and all your
12 colleagues had the best intentions and were all
13 aligned on the importance of a safety feature, did
14 that necessarily mean Meta's leadership would
15 approve that safety feature?

16 A. No, it did not.

17 Q. All right. You were asked by the
18 defense lawyer whether you would hear from other
19 team members that growth was being prioritized over
20 safety.

21 Do you recall that line of
22 questions?

23 MR. SNEED: Object to form.

24 THE WITNESS: Could you repeat the
25 question, please.

CERTIFICATE

I HEREBY CERTIFY that the witness was duly sworn by me and that the deposition is a true record of the testimony given by the witness.

It was requested before completion of the deposition that the witness, VAISHNAVI JAYAKUMAR, have the opportunity to read and sign the deposition transcript.



MICHELLE L. RIDGWAY,
Certified Shorthand Reporter,
(CA-CSR # 14592)
(Certified Court Reporter
(NJ-CCR # XI02126)
Registered Professional Reporter,
Certified Realtime Reporter
and Notary Public
Dated: February 4, 2025

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)