

Filed Under Seal

Exhibit D

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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

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. FOR
THIS DOCUMENT RELATES TO: :FILING
:PURPOSES
STATE OF TENNESSEE, ex rel, JONATHAN :22STCV21355
SKRMETTI, ATTORNEY GENERAL and :
REPORTER, :
:
V. :
:
META PLATFORMS, INC., and INSTAGRAM, :
LLC :
:
CASE NO. 23-1364-IV :

DEPOSITION UNDER VIDEO EXAMINATION OF
VAISHNAVI JAYAKUMAR
JANUARY 30, 2025
VOLUME I

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
9:24 a.m., on the above date, before Michelle L.
Ridgway, a Registered Professional Reporter,
Certified Court Reporter (NJ-CCR # XI02126),
Certified Realtime Reporter, Certified Shorthand
Reporter (CA-CSR # 14592), and Notary Public.

1 removing them altogether, and to go back to these
2 experts and talk to them about our decision and
3 make sure that they were kept updated about the
4 direction we had gone in.

5 Q. Okay. So is it fair to say that
6 you were asked to help effectuate Andrew Bosworth's
7 decision to keep cosmetic beauty filters on
8 Instagram?

9 MR. SNEED: Object to form.
10 Characterization.

11 THE WITNESS: I was -- I was tasked
12 with socializing the decision with our community of
13 experts.

14 BY MR. WARREN:

15 Q. Did you agree with the decision?

16 A. I did not.

17 Q. Did Meta leadership make the right
18 decision in restoring augmented reality cosmetic
19 beauty filters to Instagram?

20 MR. SNEED: Object to form and
21 foundation and vague.

22 THE WITNESS: I do not think that
23 Meta made the right decision there, no.

24 BY MR. WARREN:

25 Q. And why is that?

1 BY MR. WARREN:

2 Q. Meta heard from experts that
3 cosmetic beauty filters contributed to that
4 problem, correct?

5 MR. SNEED: Object to form.

6 THE WITNESS: Yes.

7 BY MR. WARREN:

8 Q. But instead of banning those
9 filters, it allowed them to continue being used on
10 Instagram, correct?

11 MR. SNEED: Object to form.

12 THE WITNESS: Yes.

13 BY MR. WARREN:

14 Q. Meta also heard from internal
15 researchers that publicly visible like counts
16 contributed to negative social comparison, correct?

17 MR. SNEED: Object to form.

18 THE WITNESS: They heard that
19 negative -- publicly visible like counts could
20 contribute and could be a factor in contributing to
21 negative social comparison.

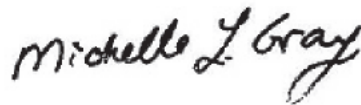
22 BY MR. WARREN:

23 Q. And Instagram explored changing
24 that feature in a way that would have mitigated the
25 problem, correct?

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.)