

Filed Under Seal

Exhibit E

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA :MDL No.
ADOLESCENT ADDICTION/PERSONAL :4:22-md-3047-YGR
INJURY PRODUCTS 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] :Lead Case No. for
:Filing Purposes
SOCIAL MEDIA CASES :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 :

T R A N S C R I P T of the
videotaped deposition of MARGARET GOULD
STEWART, taken at the offices of BAKER
BOTTS LLP, 30 Rockefeller Plaza, 44th
Floor, New York, New York, before
MARGARET M. REIHL, RPR, CRR, CCR-NJ and
Notary Public of New York, on October
21, 2024, commencing at 9:24 a.m.

1 Among these billions of users,
2 were some of these users teenagers?

3 A. Yes.

4 Q. Okay. And in the work you were
5 doing in responsible innovation to work to
6 proactively surface and address potential harms
7 that could be caused by these apps, was one of
8 the things you were concerned about potential
9 harms to teenagers using these apps?

10 MR. HALPERIN: Object to form.

11 THE WITNESS: There were a lot of
12 issues that we were engaged in, so I
13 would not say that it was -- it
14 certainly was not the single issue, and
15 I also wouldn't say that it was the main
16 focus of the team.

17 BY MS. WALSH:

18 Q. Okay.

19 A. But there was a specific issue
20 that came up related to youth safety that I
21 ended up getting involved in.

22 Q. Okay. And was that issue
23 cosmetic surgery effects?

24 A. Yes.

25 Q. Okay. And that was an issue that

1 your team looked at because of the potential
2 harms that cosmetic surgery effects could create
3 for teenagers?

4 MR. HALPERIN: Object to form and
5 foundation.

6 THE WITNESS: Yes, it felt like a
7 good example of the kind of thing that
8 the team and I wanted to help with.

9 BY MS. WALSH:

10 Q. Okay. Let me ask you this,
11 Ms. Stewart, do you have kids?

12 A. I do.

13 Q. Okay. And at the time that you
14 were working on this issue of cosmetic surgery
15 effects, were your kids teenagers?

16 A. They were.

17 Q. And how many kids do you have?

18 A. I have three.

19 Q. Okay. And boys, girls?

20 A. I have a boy, my middle child is
21 nonbinary, and my youngest is a girl.

22 Q. As a mother of three kids, was
23 that the perspectives that you had from being a
24 mom, is that something that had an effect on how
25 you approached issues on the responsible

1 innovation team?

2 MR. HALPERIN: Object to form.

3 THE WITNESS: Yes, I feel that
4 raising teenagers during that team
5 period gave me a perspective on why we
6 needed to be looking at this issue
7 because of my personal proximity to it.

8 BY MS. WALSH:

9 Q. Okay. And we'll talk about that
10 a little bit more a little bit later in your
11 testimony, but during this time when you were
12 working on this issue of cosmetic surgery
13 effects, were you one of the few executives at
14 Meta who had teenaged kids, the few senior
15 executives who had teenage kids?

16 MR. HALPERIN: Object to form and
17 foundation.

18 THE WITNESS: As far as I know,
19 there were a handful of executives who
20 had teenage kids. Many of the
21 executives did not have children or had
22 young children.

23 MS. WALSH: Okay. So I want to
24 talk in more detail now about cosmetic
25 surgery effects, okay. And I want to

1 A. Yes, they can be, yes.

2 Q. Keeping these photographs, these

3 selfie manipulations and cosmetic surgery

4 effects in mind, let me ask you this,

5 Ms. Stewart: When you were working at Meta as

6 the head of responsible innovation, were you

7 concerned that the existence of cosmetic surgery

8 effects like these could contribute to a teenage

9 girl's mental health issues?

10 MR. HALPERIN: Obstacle.

11 THE WITNESS: Yes.

12 BY MS. WALSH:

13 Q. And given that concern, did you

14 consult with mental health experts outside of

15 Meta to better understand the impacts that

16 cosmetic surgery effects like these could have

17 on a teenager?

18 MR. HALPERIN: Object to form.

19 THE WITNESS: We consulted with

20 experts. I would have to review the

21 specific experts to see if they were

22 specifically mental health experts or

23 academics doing research in this area or

24 a combination of those.

25 BY MS. WALSH:

1 Q. And we're showing the jury those
2 apps now?

3 A. Correct.

4 Q. Okay.

5 A. I should say -- if you could
6 bring the family of apps back?

7 Q. Sure.

8 A. I don't believe that it was --
9 it's not shown here, but the reality labs team
10 was actually where some of these effects were
11 being developed in a team called Spark AR.

12 Q. Okay.

13 A. So even though there wasn't an
14 app with a camera, that organization was a part
15 of these discussions too because we knew in
16 future years between VR head sets and augmented
17 reality experiences that this policy would
18 effect those products as they came to market as
19 well.

20 Q. Okay, understood.

21 Now, did there, in fact, as a
22 result of the efforts that were instigated
23 originally by people in product policy and that
24 you led, did there come to be -- was there a
25 temporary ban placed on cosmetic surgery effects

1 such as these?

2 A. There was. And my recollection
3 is that -- I would have to look up when this
4 happened, but when the Spark AR platform, which
5 is a developer platform that allows outside
6 designers and engineers to develop effects that
7 might be offered on the platform, when that
8 opened up, we saw there were a set of filters
9 that were created. And we're seeing, as I
10 recall, fairly high usage that were quite
11 extreme in nature around cosmetic surgery, much
12 more direct than what we're looking at in this
13 exhibit on cosmetic surgery effects. They
14 actually were filters that outlined nip and tuck
15 diagramming on people's faces, and this was very
16 concerning and something that I think there was
17 fair unanimity about in the company that we did
18 not want those things.

19 And so there was a temporary ban
20 put on -- and I don't recall what the scope
21 of -- exactly what the scope of the temporary
22 ban was but around cosmetic surgery filters so
23 that the team in policy presumably working with
24 product could have the time to research how
25 pervasive these were, how much usage they were

1 getting and get outside advice on how we might
2 approach whether or not we would allow these.

3 And at a certain point, we had to
4 revisit whether that ban would be -- sorry, I
5 don't know if you want to -- okay, there was a
6 certain point at which once that temporary ban
7 was put into place by policy, that we had to
8 decide if we were going to continue that ban for
9 another period of time, lift it or make it
10 permanent.

11 Q. Okay. So, Ms. Stewart, let me --
12 I'm going to move to strike that as
13 nonresponsive --

14 A. Okay.

15 Q. -- which is okay.

16 A. Yeah.

17 Q. But let me just ask a question
18 which is: Did there come a time when cosmetic
19 surgery effects, including ones like these, were
20 temporarily banned?

21 A. Yes.

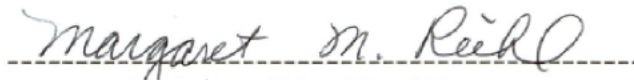
22 Q. And do you recall the date or the
23 approximate date when that would have been?

24 A. I -- my pandemic brain often
25 mixes up '19, '20, '21, so I literally may be a

C E R T I F I C A T I O N

I, MARGARET M. REIHL, a
Registered Professional Reporter,
Certified Realtime Reporter, Certified
Court Reporter and Notary Public, do
hereby certify that the foregoing is a
true and accurate transcript of the
testimony as taken stenographically by
and before me at the time, place, and on
the date hereinbefore set forth.

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.



Margaret M. Reihl, RPR, CRR, CLR

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