

Filed Under Seal

Exhibit A

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA) Case No. 4:22-MD-03047-YGR
ADOLESCENT ADDICTION/)
PERSONAL INJURY PRODUCTS) MDL No. 3047
LIABILITY LITIGATION)
_____)
THIS DOCUMENT RELATES TO)
ALL ACTIONS)

MONDAY, JUNE 9, 2025

CONFIDENTIAL - ATTORNEYS' EYES ONLY -
PURSUANT TO PROTECTIVE ORDER

— — —
Videotaped Rule 30(b)(6) Deposition of SAYED OTARU,
taken pursuant to notice and conducted at the offices of
Covington & Burling, LLP, 3000 El Camino Real 5, Palo Alto
Square, 10th Floor, Palo Alto, California, 94306, commencing
at 9:05 a.m., PDT, on the above date, before Jennifer A.
Dunn, Registered Merit Reporter, Certified Realtime
Reporter, California (#14461), Illinois & Texas Certified
Shorthand Reporter, and Missouri Certified Court Reporter.

Job No. MDLG 7414081

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1 Q What percentage of Instagram users in the United
2 States with a stated age between 13 and 17 are enrolled in
3 teen accounts?

4 A 100 percent.

5 Q Did Meta provide parents with a safety update
6 announcement on teen accounts earlier this year?

7 A Yes.

8 MR. EPPICH: Let me hand you what we've
9 marked as Exhibit 11.

10 (Meta-Otaru-11 marked for identification.)

11 BY MR. EPPICH:

12 Q Are you familiar with Exhibit 11?

13 A Yes.

14 Q What is Exhibit 11?

15 A This exhibit is our announcement that we were
16 working with parents to begin using new technology where we
17 would try to predict teens on the platform who have told us
18 they're adults, and placed those predicted teens, or likely
19 predicted teens, into teen accounts.

20 Q And what is the date of this press release?

21 A April 21st, 2025.

22 Q If I could ask you to turn to the second page of
23 the document. And it says in the first bullet: "As we
24 continue to expand teen accounts, we want to make sure as
25 many teens as possible are enrolled."

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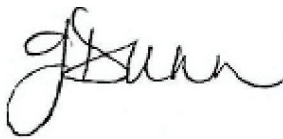
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CERTIFICATE

I, Jennifer A. Dunn, Certified Realtime Reporter, Registered Merit Reporter, California Certified Shorthand Reporter #14461, do hereby certify that prior to the commencement of the examination, SAYED OTARU, was duly remotely 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 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.



Certified Realtime Reporter

Registered Merit Reporter

CA Certified Shorthand Reporter #14461

Dated: June 10, 2025