

Filed Under Seal

Exhibit B

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

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

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

9 COORDINATION PROCEEDING)
10 SPECIAL TITLE [RULE 3.400]) Lead Case No.
11) 22STCV21355

12 SOCIAL MEDIA CASES)

13 -----)
14 This Document Relates to:)

15 STATE OF TENNESSEE,)
16 ex rel. JONATHAN SKRMETTI,)
17 ATTORNEY GENERAL and REPORTER,)
18 v.)
19 META PLATFORMS, INC., and)
20 INSTAGRAM, LLC,)
21 Case No. 23-1364-IV)

22 -----)
23 Tuesday, March 18, 2025
24 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
25 Continuing Video-Recorded Oral
Deposition of ADAM S. MOSSERI, VOLUME 2, held
at the offices of Covington & Burling LLP,
Salesforce Tower, 415 Mission Street, Suite
5400, San Francisco, California, commencing
at 9:35 a.m. PST on the above date, before
Michael E. Miller, Fellow of the Academy of
Professional Reporters, Certified Court
Reporter, Registered Diplomate Reporter,
Certified Realtime Reporter and California
CSR #13649.

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1 address age-appropriate content, like the
2 recommendations -- sorry, the Sensitive
3 Content Control.

4 There are things here trying to
5 address self-harm, like sensitivity screens.
6 And there are lots of things here that try to
7 address bullying, like limited interactions
8 and Hidden Words and Restrict.

9 So some of these tools actually
10 try to address multiple problems. Some are
11 very squarely focused on individual problems.
12 We've launched a lot of things, a number of
13 things over the years, and we will continue
14 to do so.

15 BY MS. JONES:

16 Q. And that was actually going to
17 be my next question, Mr. Mosseri.

18 Has the company, over time,
19 continued to focus on the development of
20 tools and features for people, but also
21 specifically, for teens who use Instagram?

22 MR. PHELPS: Objection, form.

23 A. Yes. We have and we will
24 continue to develop tools and features to try
25 and make Instagram a more positive place,

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CERTIFICATE

I, MICHAEL E. MILLER, Fellow of the Academy of Professional Reporters, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ADAM S. MOSSERI 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 pursuant to FRCP Rule 30, signature of the witness was not requested by the witness or other party before the conclusion of the deposition.

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



MICHAEL E. MILLER, FAPR, RDR, CRR
Fellow of the Academy of Professional Reporters
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Dated: March 31, 2025