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Exhibit C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES - SPRING STREET COURTHOUSE

COORDINATION PROCEEDING
SPECIAL TITLE [RULE 3.400]

SOCIAL MEDIA CASES | Lead Case for Filing
Purposes
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

VIDEOTAPED DEPOSITION OF NICK CLEGG
Volume 2

Taken on Behalf of the Plaintiffs

DATE TAKEN: Friday, March 21, 2025
TIME: 9:28 a.m. - 6:02 p.m. GMT
PLACE: Covington & Burling LLP
22 Bishopsgate, 54th Floor
City of London, London EC2N 4BQ
United Kingdom

Examination of the witness stenographically reported by:
SUSAN D. WASILEWSKI, RPR, CRR, CMRS, CRC, FPR

- - -

GOLKOW, a Veritext Division
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1 tools safety -- safely and that parents have got
2 simple, easy to use visibility over that.

3 I think one of the issues which a technology
4 company sometimes has is -- is building tools which
5 are then -- there's one thing about building the
6 tools, there's the other about making them easy to
7 use. And I think there was a real appreciation from
8 the research, from market surveys, that some parents
9 didn't know about some of the tools that previously
10 existed. So it was also about empowering parents.
11 Many parents won't be using Instagram themselves,
12 and it was making the tools extremely simple to use.

13 As I say, it's clearly the right thing for
14 families, right thing for parents, right thing for
15 teens. It's actually the right thing for the
16 company, because, you know, the company is not going
17 to benefit if people don't feel these experiences
18 are safe.

19 Q. Even in the wake of teen accounts, does the
20 company continue to work on additional controls and
21 tools and resources to ensure safe and positive
22 experiences?

23 MS. O'NEILL: Objection; form.

24 A. Of course it does, but not in the least
25 because the technology evolves. You know, teens

C E R T I F I C A T E

I, Susan D. Wasilewski, Registered Professional Reporter, Certified Realtime Reporter, Certified Manager of Reporting Services, Certified Realtime Captioner, and Florida Professional Reporter, hereby certify that the witness named herein appeared before me on Friday, March 21, 2025, and was duly sworn.

I FURTHER CERTIFY that I was authorized to and did stenographically report the examination of the witness named herein; that a review of the transcript was requested; and that the foregoing transcript is a true record of my stenographic notes.

I FURTHER CERTIFY that I am not related to or an employee of any of the parties, nor am I related to or an employee of any of the parties' attorneys or counsel connected with this action, nor am I financially interested in the outcome of this action.

WITNESS my hand this 10th of April, 2025.



Susan D. Wasilewski, RPR, CRR, CMRS, CRC, FPR