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Exhibit D

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No.

IN RE: SOCIAL MEDIA ADOLESCENT 4:22-MD-03047-YGR
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

This Document Relates To:

ALL ACTIONS

CONFIDENTIAL - ATTORNEYS' EYES ONLY
PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF
ALLISON L. HARTNETT

Held At: Covington & Burling LLP
Salesforce Tower
4415 Mission Street
San Francisco, California

June 16th, 2025
9:59 a.m.

Reported By:
MAUREEN O. POLLARD, CSR #14449, RDR

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1 THE WITNESS: Yes, I believe. I am
2 still struggling to understand exactly our
3 use.

4 So since 2012 Meta has had difference
5 in its practices between over and under 18
6 users. Or are you asking a different
7 question than that?

8 BY MR. OLSZEWSKI-JUBELIRER:

9 Q. My question is, in terms of the data
10 that Meta uses to decide which ads to show users,
11 you're saying Meta currently has a different
12 practice based on the age of the user, right?

13 A. That's right.

14 Q. And my question is, has that difference
15 always existed since 2012, or did it start at some
16 time during that period?

17 MR. CHAPUT: Object to the form.

18 THE WITNESS: There has always been
19 some difference, but the difference has
20 changed over time.

21 Does that answer your question?

22 BY MR. OLSZEWSKI-JUBELIRER:

23 Q. Okay. All right. Why don't we talk
24 about the current state of things, and we can go
25 backwards.

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1 A. Okay.

2 Q. So currently what data does Meta use to
3 decide which ads to show to users under --

4 A. 18.

5 Q. -- under 18?

6 A. Sorry I interrupted you.

7 Today Meta uses more limited data to
8 show ads to users under 18. The precise data is age
9 as well as a location, which is city level or
10 higher, or less granularity. That's what Meta uses
11 today.

12 Q. That is the only data that Meta uses to
13 decide which ads to deliver to users under 18?

14 MR. CHAPUT: Objection to form.

15 And, Counsel, I just want to be clear
16 on the time period. You've been saying
17 "currently." Generally the scope of
18 testimony ends in April 2024, so I just
19 want to make sure that we have agreement
20 that when you say "currently," right, that
21 we have clarity on what exactly that means.

22 MR. OLSZEWSKI-JUBELIRER: Sure. I
23 think the witness brought up the present
24 state of things, first of all, so that's
25 what I was asking about.

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1 you to that page on the Help Center, right?

2 A. Yep.

3 Q. But if you click Report, it sends -- it
4 just submits the report, right?

5 A. Yes.

6 Q. It doesn't send you to the Help Center,
7 right, to fill out the web form?

8 A. Yes, that's right.

9 Q. Okay. And that's the new underage
10 reporting flow, right?

11 A. Yes, that's what's referred to as
12 in-app reporting prior in my testimony where you
13 don't go through the contact form at all, and that
14 has been shown to double the rate of false reports.

15 Q. Okay. The prior flow we just looked at
16 with six or seven screens, that existed on Instagram
17 also in 2022, right?

18 A. Yes.

19 Q. And that flow still exists right now on
20 Instagram, right?

21 MR. CHAPUT: Object to the form.

22 Scope.

23 THE WITNESS: Yes.

24 BY MR. OLSZEWSKI-JUBELIRER:

25 Q. That flow existed as of April 1st, 2024

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CERTIFICATE OF COURT REPORTER

I, MAUREEN O'CONNOR POLLARD, Registered
Diplomate Reporter, CSR No. 14449 for the State of
California, the officer before whom the foregoing
deposition was taken, do hereby certify that the
foregoing transcript is a true and correct record of
the testimony given; that said testimony was taken
by me stenographically and thereafter reduced to
typewriting under my direction; and that I am
neither counsel for, related to, nor employed by any
of the parties to this case and have no interest,
financial or otherwise, in its outcome.

Dated this 17th day of June, 2025.

Maureen O. Pollard

MAUREEN O'CONNOR POLLARD

CSR No. 14449