

Filed Under Seal

Exhibit E

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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

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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
SOCIAL MEDIA CASES) Filing Purposes
22STCV21355

This Document Relates to:)
STATE OF TENNESSEE, et al.,)
vs.)
META PLATFORMS, INC., and)
INSTAGRAM, LLC, Case No.)
23-1364-IV)

-----x
V O L U M E I

VIDEOTAPED DEPOSITION OF PAUL ALEXANDER DOW

SAN DIEGO, CALIFORNIA

THURSDAY, NOVEMBER 7, 2024

9:05 A.M.

Job No.: 6933425
Pages: 1 - 379
Reported by: Leslie A. Todd, CSR No. 5129 and RPR

1 negative affect.

2 Does that sound like something that
3 we can kind of agree on to use as "well-being"?

4 A. I -- while that sounds reasonable,
5 I believe that it would not be an accurate
6 representation of every time we used
7 "well-being."

8 Q. Sure.

9 A. And particularly, my role as a
10 researcher and managing a research team, usually
11 we would use that term in a particular context
12 with a particular definition that I don't know
13 that I can recite right now.

14 Q. Similar question for "social
15 comparison." Can you give me your sort of
16 current, best understanding of "social
17 comparison"?

18 A. Yeah, I mean, again, this is
19 probably a term that was used by a lot of
20 different people in different contexts meaning
21 slightly or very different things.

22 I can summarize how I understood it
23 as the leader of a research team that did some
24 research in this space. Again, I'm not an expert
25 in well-being, social comparison. There were

CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

The undersigned Certified Shorthand Reporter
does hereby certify:

That the foregoing proceeding was taken before
me at the place and time therein set forth, at
which time the witness was duly sworn; That the
testimony of the witness and all objections made at
the time of the examination were recorded
stenographically by me and were thereafter
transcribed, said transcript being a true and
correct copy of my shorthand notes thereof; That
the dismantling of the original transcript will
void the reporter's certificate.

In witness thereof, I have subscribed my name
this date: November 22, 2024.

A handwritten signature in blue ink that reads "Leslie Anne Todd". The signature is written in a cursive style and is positioned above a horizontal line.

LESLIE A. TODD, CSR, RPR

Certificate No. 5129

(The foregoing certification of
this transcript does not apply to any
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