

Filed Under Seal

Exhibit F

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 IN RE: SOCIAL MEDIA Case No. 4:22-MD-03047-
ADOLESCENT ADDICTION/ YGR
4 PERSONAL INJURY PRODUCTS 4:23-cv-05448
LIABILITY LITIGATION YGR

5
6 IN THE CHANCERY COURT OF DAVIDSON COUNTY
7 FOR THE TWELFTH JUDICIAL DISTRICT AT NASHVILLE
8 STATE OF TENNESSEE, Case No. 23-1364-IV
EX REL. JONATHAN SKRMETTI,
9 ATTORNEY GENERAL and REPORTER

10
11
12 VIDEOTAPED DEPOSITION OF
13 SAYED OTARU
14 HIGHLY CONFIDENTIAL
15 WEDNESDAY, DECEMBER 17, 2025
16 PALO ALTO, CALIFORNIA
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23

24 Reported By:
KATHLEEN A. MALTBIE, STENOGRAPHIC REPORTER
California CSR 10068, Nevada CCR 995, Texas CSR
25 12212, RPR-RMR-CRR-CCRR-CLR-CRC-RDR

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1 A. I -- I honestly don't know. And I
2 would -- I would -- I would, again, reach out to the
3 analytics team to see if it were possible to go back
4 that far. But I -- I don't know.

5 Q. If he asked you, I want to understand what
6 these statistics look like today, after the rollout
7 of the teen accounts, is that something you would be
8 able to do?

9 MR. EPPICH: Object to the form. Vague.

10 THE WITNESS: Sorry, which specific
11 statistics, sir?

12 BY MR. SLOTHOUBER:

13 Q. The ones listed on the page.

14 A. Sorry. Just to make sure I understand,
15 you're saying if Adam came today and said he wanted
16 to understand, for predicted teens or predicted age
17 teen usage, what are the statistics for that?

18 Q. Yes.

19 A. Sir, I would probably do the same two
20 things I already communicated to you. It sounds
21 very similar to the hypothetical you were asking a
22 little bit about. I would -- I would look for
23 preexisting information on that in Workplace, as an
24 example. But I'd probably go to the analytics team
25 to -- to try to help -- to try to help answer that.

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1 says the other two around U.S. teens having outsized
2 non-rec content in the reels tab and IFR photo and
3 reels ranking returning empty results, this is
4 talking about moment-in-time issues that were
5 unexpected.

6 And that has obviously since been
7 addressed, because this was in 2023.

8 BY MR. SLOTHOUBER:

9 Q. Is it your testimony that teens do not
10 have outsized non-recs today?

11 MR. EPPICH: Object to the form. Vague.

12 THE WITNESS: Relative to who?

13 BY MR. SLOTHOUBER:

14 Q. General population.

15 MR. EPPICH: Object to the form. Vague.

16 THE WITNESS: So you're asking -- to make
17 sure I understand correct, sir, you're asking -- you
18 asked me, is my understanding that teens today do
19 not have an outsized, as you say, non-rec prevalence
20 relative to general population.

21 BY MR. SLOTHOUBER:

22 Q. Yep.

23 A. Teens have a lower prevalence of seeing
24 age-inappropriate content than gen pop does.

25 Q. How can that even be statistically true?

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1 CERTIFICATE OF REPORTER

2 I, Kathleen A. Maltbie, Certified

3 Shorthand Reporter licensed in the State of
 4 California, License No. 10068, the State of Nevada,
 5 CCR 995, and the State of Texas, CSR 12212, hereby
 6 certify that deponent was by me first duly sworn,
 7 and the foregoing testimony was reported by me and
 8 was thereafter transcribed with computer-aided
 9 transcription; that the foregoing is a full,
 10 complete, and true record of proceedings.

11 I further certify that I am not of counsel
 12 or attorney for either or any of the parties in the
 13 foregoing proceeding and caption named or in any way
 14 interested in the outcome of the cause in said
 15 caption.

16 The dismantling, unsealing, or unbinding
 17 of the original transcript will render the
 18 reporter's certificates null and void.

19 In witness whereof, I have hereunto set my
 20 hand this day:

21 ___x___ Reading and Signing was requested.

22 _____ Reading and Signing was waived

23 _____ R^e Kathleen Maltbie ed.

24 KATHLEEN A. MALTBIE

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