

Filed Under Seal

Exhibit G

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT) MDL No.
ADDICTION/PERSONAL INJURY) 4:22-md-3047-YGR
PRODUCTS LIABILITY LITIGATION)
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THIS DOCUMENT RELATES)
ALL ACTIONS)
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Wednesday, December 10, 2025

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
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Video-Recorded Oral Deposition of LARS
BACKSTROM, PhD, held at the offices of
Covington & Burling LLP, 3000 El Camino Real,
10th Floor, Palo Alto, California commencing
at 9:09 am 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 BY MR. COCANOUGHER:

2 Q. Is there a similar ranking and
3 recommendation system for Instagram's Feed as
4 there is for Facebook's?

5 MR. CHAPUT: Objection, form,
6 vague as to time.

7 Counsel, are you asking just
8 about the present period or the
9 entirety of the time that Instagram
10 and Facebook have used ranking and
11 recommendation systems?

12 MR. COCANOUGHER: Okay.

13 BY MR. COCANOUGHER:

14 Q. So let's start with the current
15 time period.

16 A. So Instagram and Facebook both
17 have ranking and recommendation systems.
18 They share a number of similarities and also
19 have a handful of differences.

20 But I'd say that they certainly
21 both use ranking and recommendations for the
22 ordering of their feeds.

23 Q. And just, I should have started
24 with this, but both Facebook and Instagram do
25 have a Feed when a user signs in, as you

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1 working -- they take inputs from previous
2 layers and produce an output.

3 And then the machine learning
4 algorithm needs to learn all of those
5 individual weights to, you know, best map
6 from the input features to the output labels,
7 similar to, you know, the other algorithms,
8 it is producing a probability output.

9 BY MR. COCANOUGHER:

10 Q. Eventually, Meta combined
11 multitask neural nets with boosted decision
12 trees, correct?

13 A. Yes.

14 Q. Does Meta still use multitask
15 neural nets plus boosted decision trees?

16 A. I don't believe we use decision
17 trees anymore. I think we have moved on to
18 using larger and larger neural networks, and
19 that has kind of obviated the need for the
20 decision tree layer.

21 Q. So if you were asked what is
22 the current model training phase that Meta
23 uses, how would you respond to that?

24 A. That we use neural networks.

25 Q. All right.

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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, LARS BACKSTROM, PhD 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 terested in the



MICHAEL E. MILLER, FAPR, RDR, CRR
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Dated: December 12, 2025