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Exhibit L

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION/)
PERSONAL INJURY PRODUCTS) MDL No. 3047
LIABILITY LITIGATION)

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

COORDINATION PROCEEDING)
SPECIAL TITLE [RULE 3.400])
SOCIAL MEDIA CASES) Lead Case No.
22STCV21355

This Document Relates To)
STATE OF TENNESSEE, ex rel.)
JONATHAN SKRMETTI,)
ATTORNEY GENERAL and)
REPORTER,)
v.)
META PLATFORMS, INC., and)
INSTAGRAM, LLC.)

CONFIDENTIAL - ATTORNEYS' EYES ONLY
PURSUANT TO PROTECTIVE ORDER
VOLUME 1

VIDEO-RECORDED
DEPOSITION OF ARTURO BEJAR
(Pages 1 - 351)

Held at Baker Botts
1001 Page Mill Road, Palo Alto, California
Monday, April 7, 2025, 9:20 a.m.

- - - -
REPORTED BY: ELAINA BULDA-JONES, CSR 11720

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1 BY MR. CARTMELL:

2 Q. You mentioned that I think step one is
3 reporting from the users to the company about bad
4 experiences; is that right?

5 A. That is correct.

6 Q. And when you looked at Instagram's
7 reporting flow or that reporting system, did you
8 find it was flawed?

9 A. Yes, I did.

10 Q. In what respect?

11 A. The -- it was not designed for teenagers.
12 Teenagers and adults got exactly the same
13 categories. And the categories are not -- do not
14 reflect the harms that were, for example, in the
15 Negative Experiences Survey. And we knew from the
16 work I had done in my first stint that you have to
17 give people reasons that match what they are
18 experiencing in order for them to select and use the
19 tools that you are giving them.

20 And so if you see -- if somebody sends you
21 a dick pic, I don't know what you select in the
22 options that they have, which is one of the examples
23 I used extensively in my second stint, when I was
24 talking to people at Instagram saying, like, when a
25 teenagers gets an unwanted nude, what do they do?

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1 And to this day, today, when a teenager gets an
2 unwanted nude, what do they do? I keep testing this
3 regularly in the hope that there is going to be
4 something, which is the first step.

5 Q. Okay. So -- and did you discover, when
6 you were looking, whether or not actually kids were
7 using the reporting flow and they had a meaningful
8 amount of kids reporting harms?

9 MS. JONES: Objection. Foundation. Form.

10 THE WITNESS: When we looked at the
11 reporting tools that they provide, one of the things
12 that we found is of the people who have had -- who
13 told us they had a bad experience, only 1 percent of
14 them finished submitting feedback through the
15 reporting tool. Like, one in a hundred people
16 actually used the tool all the way through.

17 I believe, based on prior experience and
18 the way this is assigned, that that number for
19 teenagers is likely much lower.

20 And then, like, how can you prevent harm
21 if you're not letting people tell you when it's
22 happening.

23 BY MR. CARTMELL:

24 Q. Is one of the things that you did when you
25 were at Meta from 2019 to 2021 as their safety

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1 BY MR. CARTMELL:

2 Q. You're talking about testing that you did
3 a week ago; is that right?

4 A. In the most recent weeks. So beginning --
5 like for the last month I've been doing some
6 testing.

7 Q. Okay. I'm going to hand you what has been
8 marked as Exhibit 12.

9 (Whereupon, Meta-Bejar Exhibit 12 was
10 marked for identification.)

11 BY MR. CARTMELL:

12 Q. And ask you what Exhibit 12 is.

13 This was something that you produced from
14 your files in this litigation; is that correct?

15 A. That is correct.

16 Q. So tell us, you mentioned that you had
17 done testing on accounts in the past, correct?

18 A. That is correct.

19 Q. And is this a -- an account of the testing
20 you've done over time?

21 A. That is correct.

22 Q. Why don't you go ahead and just explain
23 briefly what this document is that we just marked as
24 Exhibit 12.

25 A. Yeah. So in November of 2023, I really

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1 into violent sexual fantasies of being told of you
2 being raped in front of your family.

3 And these things, they should never
4 happen, like in the first place. They are such an
5 awful experience. And then you put that on a
6 13-year-old or a 14-year-old, and they get a message
7 like this. And today, there's still no way for them
8 to effectively report something like this.

9 Q. So this is not a violation of Instagram's
10 community standards?

11 MS. JONES: Objection. Foundation and
12 form.

13 THE WITNESS: If you read the community
14 standards, they very explicitly say they would
15 not -- they do not allow things like this. It says
16 if you -- I don't have it here, but it says we don't
17 allow that. But the interpretation of that is if
18 you get this message, and you try to report it, one,
19 what category do you select? Right. That's really
20 broken. And then if you do submit a report, will
21 they act on it?

22 And I tested it again in the last week
23 between two test accounts a message similar to this.
24 I tried to report it. And I got the feedback saying
25 this does not violate our community guidelines.

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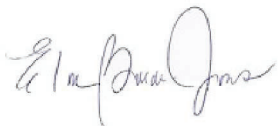
1 STATE OF CALIFORNIA)

2 COUNTY OF YOLO)

3 I, ELAINA BULDA-JONES, a Certified Shorthand
4 Reporter of the State of California, duly authorized
5 to administer oaths pursuant to Section 2025 of the
6 California Code of Civil Procedure, do hereby
7 certify that

8 ARTURO BEJAR,
9 the witness in the foregoing deposition, was by me
10 duly sworn to testify the truth, the whole truth and
11 nothing but the truth in the within-entitled cause;
12 that said testimony of said witness was reported by
13 me, a disinterested person, and was thereafter
14 transcribed under my direction into typewriting and
15 is a true and correct transcription of said
16 proceedings.

17 I further certify that I am not of counsel or
18 attorney for either or any of the parties in the
19 foregoing deposition and caption named, nor in any
20 way interested in the outcome of the cause named in
21 said deposition dated the _____ day of
22 _____, 2025.

23 
24

25 ELAINA BULDA-JONES, CSR 11720