

Filed Under Seal

Exhibit C

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION/)
PERSONAL INJURY PRODUCTS) MDL No. 4:22-md-3047-YGR
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.)
Case No. 23-1364-IV)
-----)

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF BRIAN BOLAND

APRIL 25, 2025

(Pages 1 - 422)

9:18 a.m. to 7:18 p.m.

Zuckerman Spaeder

2100 L Street, NW, Washington, DC 20037

Reported By: Amanda Blomstrom, RMR, CRR, and
CSR TX #8785/CA #12681/IL #84-3634

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1 right?

2 A. That is correct.

3 Q. And that's a picture of you right up
4 front, right?

5 A. It is.

6 Q. All right. Are you familiar with this
7 article?

8 A. Very.

9 Q. Okay. And is it accurate that this
10 article relates to a disagreement within Meta about
11 whether the company should disclose certain data
12 about which content was most viewed on Facebook?

13 MR. SNEED: Object to form.

14 THE WITNESS: It is.

15 BY MS. SINGER:

16 Q. And on Page 2, if you look about a third
17 of the way down, the paragraph beginning "On one side
18 were executives ..."

19 A. I see it.

20 Q. Okay.

21 "On one side were executives, including
22 Silverman and Brian Boland, a Facebook vice president

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1 in charge of partnerships strategy, who argued that
2 Facebook should publicly share as much information as
3 possible about what happens on its platform - good,
4 bad, or ugly."

5 Now, who -- who is -- who is Brandon
6 Silverman?

7 A. Brandon Silverman was the cofounder and
8 CEO of CrowdTangle when it was acquired, and
9 continued to lead CrowdTangle's product and
10 operations and sales teams while they were inside of
11 Facebook.

12 Q. Okay. And does this article accurately
13 represent the position that you and Brandon Silverman
14 took about publicly sharing as much information as
15 possible about content on Facebook's platform?

16 A. It does.

17 Q. And why do you think Facebook should share
18 as much information as possible about what happens on
19 its platform?

20 A. I believe that, at the scale that Facebook
21 operates, that it has a special level of influence on
22 society. At the same time, it is of such, not only

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1 importance but complexity in the way that it could
2 impact broad groups of diverse users. And trying to
3 understand that alone felt impossible to me.

4 That in partnership with society broadly,
5 that sharing more data would enable more bright minds
6 to help Facebook be a better influence on society.

7 Q. If you read down to the next paragraph, it
8 says, "On the other side were executives, including
9 the company's chief marketing officer and vice
10 president of analytics, Alex Schultz, who worried
11 that Facebook was already giving away too much."

12 Is it accurate -- are you familiar with
13 whether Alex Schultz took a position against the
14 disclosure of this kind of content information?

15 MR. SNEED: Object to form.

16 THE WITNESS: Yes, he did.

17 BY MS. SINGER:

18 Q. And how do you know that?

19 A. I had seen presentations that he had
20 created around CrowdTangle as a "what to do with
21 CrowdTangle," as well as discussions on emails around
22 whether CrowdTangle was providing information that

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1 wasn't helpful to Facebook.

2 Q. Okay. And you saw those presentations?

3 A. I did.

4 Q. Okay. And then if you read down one more
5 paragraph, skip one, then move to, "These executives
6 argued that Facebook should selectively disclose its
7 own data in the form of carefully curated reports,
8 rather than handing outsiders the tools to discover
9 it themselves."

10 Do you understand that to be consistent
11 with the position that Alex Schultz took?

12 A. I do.

13 Q. And who else took that position, if
14 anybody, at Facebook?

15 A. I -- I don't recall.

16 Q. Okay. And what was it that Alex Schultz
17 wanted or didn't want to be disclosed?

18 MR. GOLDFARB: Objection to form.

19 MR. SNEED: Objection to form; foundation.

20 THE WITNESS: It's been a while since I
21 reviewed the specifics on it, but it was -- there
22 was pushback on the idea that engagement was being

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1 heavily discussed, as opposed to metrics like reach,
2 which show you some level of data but they don't
3 show you how content is really being -- is really
4 impacting people. And so the idea that you would
5 change the type of data you made available, that you
6 would move towards very high-level aggregated data,
7 that you lose a lot of ability to understand what's
8 happening on the platform if you look at, for
9 example, all content in the United States, as opposed
10 to being able to have a tool that you can choose your
11 filters and study what's happening in the content
12 landscape.

13 And so it pulled away from that type of
14 transparency to something very curated by Meta for
15 their own interests.

16 BY MS. SINGER:

17 Q. Okay. And then -- so this article and
18 your testimony describes two points of view at
19 Facebook. Which one won?

20 A. I lost, and we've seen subsequently that
21 Meta has shut down CrowdTangle and doesn't provide
22 that level of transparency today.

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REPORTER'S CERTIFICATION
DEPOSITION OF BRIAN BOLAND

APRIL 25, 2025

I, Amanda Blomstrom, a Notary Public in and for
the District of Columbia, hereby certify to the
following:

That the witness, BRIAN BOLAND, was duly sworn
by the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

That the deposition transcript was submitted to
the witness or to the attorney for the witness for
examination and signature;

I further certify that I am neither counsel for,
related to, nor employed by any of the parties or
attorneys in the action in which this proceeding was
taken, and further that I am not financially or
otherwise interested in the outcome of the action.

Certified to by me this 29th day of April, 2025.



Amanda Blomstrom, CRR, RMR, CLR
Texas CSR No. 8785
California CSR No. 12681
Illinois CSR No. 84-3634