

Exhibit 4

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA) Case No. 4:22-MD-03047-YGR
ADOLESCENT ADDICTION/)
PERSONAL INJURY PRODUCTS) MDL No. 3047
LIABILITY LITIGATION)
_____)
THIS DOCUMENT RELATES TO)
ALL ACTIONS)

MONDAY, JUNE 9, 2025

CONFIDENTIAL - ATTORNEYS' EYES ONLY -
PURSUANT TO PROTECTIVE ORDER

— — —
Videotaped Rule 30(b)(6) Deposition of SAYED OTARU,
taken pursuant to notice and conducted at the offices of
Covington & Burling, LLP, 3000 El Camino Real 5, Palo Alto
Square, 10th Floor, Palo Alto, California, 94306, commencing
at 9:05 a.m., PDT, on the above date, before Jennifer A.
Dunn, Registered Merit Reporter, Certified Realtime
Reporter, California (#14461), Illinois & Texas Certified
Shorthand Reporter, and Missouri Certified Court Reporter.

Job No. MDLG 7414081

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1 Q What percentage of Instagram users in the United
2 States with a stated age between 13 and 17 are enrolled in
3 teen accounts?

4 A 100 percent.

5 Q Did Meta provide parents with a safety update
6 announcement on teen accounts earlier this year?

7 A Yes.

8 MR. EPPICH: Let me hand you what we've
9 marked as Exhibit 11.

10 (Meta-Otaru-11 marked for identification.)

11 BY MR. EPPICH:

12 Q Are you familiar with Exhibit 11?

13 A Yes.

14 Q What is Exhibit 11?

15 A This exhibit is our announcement that we were
16 working with parents to begin using new technology where we
17 would try to predict teens on the platform who have told us
18 they're adults, and placed those predicted teens, or likely
19 predicted teens, into teen accounts.

20 Q And what is the date of this press release?

21 A April 21st, 2025.

22 Q If I could ask you to turn to the second page of
23 the document. And it says in the first bullet: "As we
24 continue to expand teen accounts, we want to make sure as
25 many teens as possible are enrolled."

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1 Do you see that?

2 A Yes.

3 Q The second bullet reads: "We're notifying parents
4 on Instagram with information about the importance of their
5 teens providing the correct ages online, and tips to check
6 and confirm their teens' ages all together."

7 Do you see that?

8 A Yes.

9 Q And third, the third bullet reads: "Parents don't
10 have to go it alone. We're using AI to help place suspected
11 teens into teen account settings."

12 Do you see that?

13 A Yes.

14 Q Is this the work that your team is doing at
15 Instagram?

16 A Yes.

17 Q If -- if I could ask you to -- let me -- let me
18 strike that.

19 Have you heard from parents about -- or since the
20 launch of teen accounts?

21 A Yes.

22 Q What have you heard from parents about teen
23 accounts?

24 A A majority of them have been very pleased with
25 what they've seen so far.

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1 Q Are parents and teens using the teen accounts
2 tools?

3 A Yes.

4 Q How do you know that?

5 A Well, we see that 97 percent of teens -- sorry.
6 Well over 90 percent of teens are staying in their default
7 settings, and I believe we've also seen about 85 percent of
8 parents have told us, through external survey, that they're
9 happy with the teen accounts product.

10 Q Let me ask you to read -- to -- if you see on
11 page 2 of this -- of this exhibit, the heading: "Parents
12 Tell Us that Teen Accounts are Helpful."

13 Do you see that?

14 A Yes.

15 Q The first paragraph reads: "Since September,
16 there are at least 54 million active teen accounts globally
17 with 97 percent of teens ages 13 to 15, electing to remain
18 in these protections. And we recently expanded the teen
19 accounts experience to Facebook and Messenger."

20 Did I read that correctly?

21 A That's correct, yes.

22 Q And is that the statistics that you were referring
23 to earlier?

24 A Yes.

25 Q Let's look at the next paragraph, it reads:

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1 "Parents of teens alike are telling us that they are happy
2 with this new reimagined experience."

3 Did parents of teens tell you and your team
4 members that they're happy with this new reimagined
5 experience?

6 A Yes.

7 Q The next sentence reads: "And although over
8 90 percent of parents surveyed say the new teen account
9 protections are helpful in supporting their teens on
10 Instagram, were continuing to listen to parents who are
11 concerned about how overwhelming the Internet can be when it
12 comes to making sure teens have age-appropriate
13 experiences."

14 Did I read that correctly?

15 A Yes.

16 Q Are you and your team listening to parents about
17 their concerns today?

18 A Yes.

19 Q Has -- has Meta made any changes to teen accounts,
20 or proposed any changes to teen accounts, since the release
21 of teen accounts in September 2024?

22 A Yes.

23 Q What are some of those changes?

24 A For example, we -- we've integrated the Instagram
25 live product into teen accounts, as well as the DM nudity

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1 product on the device controls into teen accounts."

2 Q Now, if you turn to page 4 of this press release,
3 there's a heading that states: "New Technology to Find
4 Suspected Teens and Place Them in Teen Accounts Settings."

5 Do you see that?

6 A Yes.

7 Q What is Meta doing to find suspected teens and
8 place them in teen accounts settings?

9 A Well, we're using artificial intelligence to try
10 to identify potential teens that may have told us they're,
11 you know, adults, and then place those, what we call
12 predicted teens, into teen accounts settings.

13 Q Is that difficult work?

14 A It's very complex. Because you have to try to
15 tell with some accuracy when someone is an adult or when
16 they're a teen.

17 It can be very challenging, but we are working
18 through the complexities and making meaningful headway
19 there.

20 Q Thank you. You can set that exhibit aside.

21 If I might, could I ask you to pull out Exhibit 3
22 from your stack of exhibits?

23 And just to refresh you, this is a copy of the
24 Meta press release titled: "Our tools, features, and
25 resources to help teens and parents."