

Exhibit 5

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 IN RE: SOCIAL MEDIA ADOLESCENT | MDL No. 4:22-MD-3047-YGR
4 ADDICTION/PERSONAL INJURY |
5 PRODUCTS LIABILITY LITIGATION |

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

8 COORDINATION PROCEEDING
9 SPECIAL TITLE [RULE 3.400]

10 SOCIAL MEDIA CASES | Lead Case for Filing
11 Purposes
12 22STCV21355

13 This document Relates to:

14 STATE OF TENNESSEE, ex rel.
15 JONATHAN SKRMETTI, ATTORNEY
16 GENERAL and REPORTER,
17 v.
18 META PLATFORMS, INC., and
19 INSTAGRAM, LLC,
20 Case No. 23-1364-IV

21 VIDEOTAPED DEPOSITION OF NICK CLEGG
22 Volume 2

23 Taken on Behalf of the Plaintiffs

24 DATE TAKEN: Friday, March 21, 2025
25 TIME: 9:28 a.m. - 6:02 p.m. GMT
26 PLACE: Covington & Burling LLP
27 22 Bishopsgate, 54th Floor
28 City of London, London EC2N 4BQ
29 United Kingdom

30 Examination of the witness stenographically reported by:
31 SUSAN D. WASILEWSKI, RPR, CRR, CMRS, CRC, FPR

32 - - -

33 GOLKOW, a Veritext Division
34 Litsup@golkow.com

1 tools safety -- safely and that parents have got
2 simple, easy to use visibility over that.

3 I think one of the issues which a technology
4 company sometimes has is -- is building tools which
5 are then -- there's one thing about building the
6 tools, there's the other about making them easy to
7 use. And I think there was a real appreciation from
8 the research, from market surveys, that some parents
9 didn't know about some of the tools that previously
10 existed. So it was also about empowering parents.
11 Many parents won't be using Instagram themselves,
12 and it was making the tools extremely simple to use.

13 As I say, it's clearly the right thing for
14 families, right thing for parents, right thing for
15 teens. It's actually the right thing for the
16 company, because, you know, the company is not going
17 to benefit if people don't feel these experiences
18 are safe.

19 Q. Even in the wake of teen accounts, does the
20 company continue to work on additional controls and
21 tools and resources to ensure safe and positive
22 experiences?

23 MS. O'NEILL: Objection; form.

24 A. Of course it does, but not in the least
25 because the technology evolves. You know, teens

1 will be using generative AI tools in a way that they
2 weren't three years ago. Teens use augmented and
3 virtual reality tools which didn't exist a few years
4 ago. So the technology evolves all the time and so
5 do the safeguards and mitigations.

6 Q. Now, you've been at the company a little
7 over six years, I believe?

8 A. Six-and-a-half, yeah.

9 Q. Do you believe, Mr. Clegg, your work at the
10 company has had a positive impact?

11 A. I hope so.

12 Q. Why?

13 A. I hope so. Why do I hope so?

14 Q. Why do you think that it's had a positive
15 impact?

16 A. Well, I hope myself and others have helped,
17 as I say, strike the right balance between retaining
18 the ability for the company to be an innovative
19 technology company, but doing so with the societal
20 permission and understanding and support that any
21 company needs to operate, not least in the area of
22 safety, parental supervision, and maximizing the
23 ability for teens to use these tools as safely and
24 wholesomely and enjoyably as possible.

25 Q. You've heard of the term "wilting flower" in