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STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT COURT

STATE OF NEW MEXICO,
EX REL., RAÚL TORREZ,
ATTORNEY GENERAL

NO. D-101-CV-2023-02838

VS.

META PLATFORMS, INC.;
INSTAGRAM, LLC; META
PAYMENTS, INC.; AND META
PLATFORMS TECHNOLOGIES,
LLC

*** CROSS-NOTICED WITH ***
SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

COORDINATION PROCEEDING
SPECIAL TITLE
[RULE 3.400]

JUDICIAL COUNCIL
COORDINATION
PROCEEDING NO. 5255

SOCIAL MEDIA CASES

THIS DOCUMENT RELATES TO: For Filing Purposes:
22STCV21355

All cases:
(Christina Arlington
Smith, et al. v. TikTok,
Inc., et al., Case No.
22STCV21355)

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(CAPTION CONTINUED)

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(CAPTION, CONTINUED)

VIDEOTAPED DEPOSITION OF
JASON R. SATTIZAHN, Ph.D.

December 8, 2025

Held at Simon Peragine Smith & Redfearn
1100 Poydras Street, 30th Floor
New Orleans, Louisiana 70163

Reported stenographically by:
Rita A. DeRouen, CCR, RPR
(CCR #2014018)
(RPR #006908)

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1 Q. And generally speaking throughout your
2 six years at Meta prior to 2024, so the first five
3 years at Meta, how did you proceed, meaning what
4 were your reviews like?

5 A. I always had stellar reviews. From what
6 I was told, I received -- well, I did formally
7 receive reviews such as greatly exceeds
8 expectations, exceeds expectations. I was quickly
9 promoted twice to what's known as a senior
10 research level.

11 And so very, very positive reviews, and
12 reviews that are statistically hard to get at the
13 company based on the information they provided me.

14 Q. Okay. In your CV that's on the screen
15 right now, your time is broken up by you from 2018
16 to '22 and then '22 to '24.

17 Do you see that?

18 A. I do.

19 Q. All right. And let's stick with the
20 first group, 2018 to 2022. It says here you had
21 "Product research lead for Facebook Marketplace
22 integrity, ranking integrity, Facebook Faith, and
23 live shopping"; is that accurate?

24 A. It is.

25 Q. And then it says, "Roles included

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1 multiple cross-company initiatives to improve user
2 quality, safety, and value."

3 Can you tell the jury what that means in
4 terms of multiple cross-company initiatives.

5 A. Sure. The way that Meta operates
6 internally, at least from -- speaking from my
7 experience in a research capacity, is you are
8 encouraged and it is expected that you work across
9 products that Facebook or Meta owns.

10 And so in the context of this, a lot of
11 the safety work I was doing, the integrity work
12 that I was doing, were projects that were actively
13 working in other spaces of the company.

14 So cross-company initiatives, for
15 instance, would include things like when I was
16 working on keeping people physically safe on
17 Facebook Marketplace, it would be, you know,
18 meeting with let's say the Instagram team in
19 New York who are working on physical safety tools,
20 sharing my information with them, helping them
21 develop their own studies around physical safety;
22 working with the Facebook dating team and saying,
23 Hey, you're releasing a new product that could
24 physically hurt people and Marketplace has a
25 product that might physically hurt people.

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1 So it's -- what I mean by multiple
2 cross-company initiatives is it was baked into the
3 work of a researcher yourself that you are
4 expected to work in every product across the
5 company to make Meta's products better.

6 And a little caveat here I'll also add
7 is a lot of the work that's done is also what's
8 known as horizontal. And so working on those
9 teams or with those teams means that the nature of
10 what you do, by definition, affects every product
11 that Meta would own.

12 And so central integrity or avatars, if
13 you're working with those teams, it inherently is
14 a cross-company initiative if you collaborate with
15 them, because what you're doing will change the
16 nature of Facebook and Instagram and whatever
17 other surface they're working on at the time.

18 Q. All right. And so your work, the
19 research that you did, was it alongside
20 researchers in the -- using the other platforms?

21 MR. STANNER:

22 Object to the form.

23 A. Yes.

24 BY MR. MIGLIORI:

25 Q. And so the types of research, did you