

Exhibit B

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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
VIDEO-RECORDED

DEPOSITION OF ALISON LEE, Ph.D.
(Pages 1 - 465)

Covington & Burling
415 Mission Street, San Francisco, California
Thursday, February 6, 2025, 9:19 a.m.

- - - -

REPORTED BY: ELAINA BULDA-JONES, CSR 11720

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1 or a BEEF distribution. BEEF is a very similar
2 version of TRIPS that's, I think, catered
3 specifically to Instagram, if I remember. Because
4 TRIPS was used -- that survey was used across all of
5 our products, Facebook, I want to say WhatsApp,
6 whatever other products are in the family of apps.
7 And BEEF was a very specific Instagram version.

8 BY MR. DUNBAR:

9 Q. Okay. I think we're going to have a
10 chance to talk a bit more about BEEF a little later
11 on.

12 But did you gain familiarity with the
13 TRIPS and BEEF surveys as part of this research?

14 MS. BARNHART: Object to the form.

15 THE WITNESS: Yes. I think I had to
16 familiarize myself, as an integrity researcher, in
17 general, to understand what the surveys were
18 measuring and use them actually to -- as a reference
19 for other research in the future to further
20 customize these surveys.

21 MR. DUNBAR: Okay. I'm going to hand you
22 another document.

23 (Whereupon, Meta-Lee Exhibit 4 was marked
24 for identification.)

25 ///