

Exhibit D

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA :MDL No.
ADOLESCENT ADDICTION/PERSONAL :4:22-md-3047-YGR
INJURY PRODUCTS 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] :Lead Case No. for
:Filing Purposes
SOCIAL MEDIA CASES :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 :

T R A N S C R I P T of the
videotaped deposition of MARGARET GOULD
STEWART, taken at the offices of BAKER
BOTTS LLP, 30 Rockefeller Plaza, 44th
Floor, New York, New York, before
MARGARET M. REIHL, RPR, CRR, CCR-NJ and
Notary Public of New York, on October
21, 2024, commencing at 9:24 a.m.

— — —

1 these pictures and the effects that have been
2 imposed on them, for the average woman these are
3 effects that could only be achieved through
4 plastic surgery; is that right?

5 MR. HALPERIN: Objection, asked
6 and answered.

7 THE WITNESS: That is what we
8 believed, yes.

9 BY MS. WALSH:

10 Q. Okay. Let me ask you this,
11 Ms. Stewart: Do these effects sometimes go by
12 different or -- strike that.

13 When you were working on this
14 issue at Meta, were these effects, did they
15 sometimes go by different names?

16 A. Yes. Both inside the company and
17 outside the company, sometimes you would see
18 them referred to as "beautification filters."
19 We tried to avoid that because it felt like it
20 was an example of the problem that these effects
21 might produce.

22 Q. I'm going to put "beautification"
23 in quotes, how about that?

24 A. That's right, yes.

25 MR. HALPERIN: Do you know, we

1 can't see that.

2 MS. WALSH: Sorry, apologies.

3 BY MS. WALSH:

4 Q. Okay. Anything else that you
5 recall them being referred to as?

6 A. I think there may be a term of
7 "selfie manipulation," although I will say that
8 is an extremely broad term that would refer to
9 any manipulation of the selfie photo, and I
10 think that cosmetic surgery and beautification
11 get closer to the topic that we were referring
12 to.

13 Q. Okay. But these are, indeed,
14 examples of selfie manipulation?

15 A. Yes.

16 Q. What about the term "augmented
17 reality"?

18 A. That is also an extremely broad
19 technical term of introducing effects, usually
20 in some kind of view port, of a camera or lenses
21 that you're looking through where effects may be
22 introduced into your environment, but that's an
23 extremely broad category of things.

24 Q. Okay. But are each of these
25 photographs an example of augmented reality?

1 A. Yes, they can be, yes.

2 Q. Keeping these photographs, these
3 selfie manipulations and cosmetic surgery
4 effects in mind, let me ask you this,
5 Ms. Stewart: When you were working at Meta as
6 the head of responsible innovation, were you
7 concerned that the existence of cosmetic surgery
8 effects like these could contribute to a teenage
9 girl's mental health issues?

10 MR. HALPERIN: Obstacle.

11 THE WITNESS: Yes.

12 BY MS. WALSH:

13 Q. And given that concern, did you
14 consult with mental health experts outside of
15 Meta to better understand the impacts that
16 cosmetic surgery effects like these could have
17 on a teenager?

18 MR. HALPERIN: Object to form.

19 THE WITNESS: We consulted with
20 experts. I would have to review the
21 specific experts to see if they were
22 specifically mental health experts or
23 academics doing research in this area or
24 a combination of those.

25 BY MS. WALSH:

1 ourselves, including the possibility of
2 physically altering our appearance in selfies by
3 lightening our skin, creating fuller lips and
4 adjusting our body size," correct?

5 A. Yes.

6 Q. And creating fuller lips, that's
7 one of the effects that we talked about earlier
8 that most people can only obtain through
9 cosmetic surgery, right?

10 A. Correct.

11 Q. Let's skip down now to the second
12 full paragraph. And it says "Although research
13 examining selfie manipulation is in its infancy,
14 findings to date suggest it exacerbates risk and
15 maintenance of several mental health concerns,
16 including body dissatisfaction, eating disorders
17 and body dysmorphic disorder cross-culturally."

18 Do you see that?

19 A. Yes.

20 Q. And then we see a series of names
21 and dates in the parentheses.

22 A. Yes.

23 Q. And do you understand those to be
24 citations to academic work that supports this
25 sentence in the Literature Review?

1 A. Yes.

2 Q. Okay. Ms. Stewart, when we
3 talked earlier about your concern about
4 potential harms that could come from a young
5 woman using selfie filters and the potential
6 harms of that, do your concerns include things
7 like body dissatisfaction?

8 A. Yes.

9 Q. And eating disorders?

10 A. Yes.

11 Q. And body dysmorphic disorder?

12 A. Yes.

13 Q. Okay. And, Ms. Stewart, is part
14 of the concern -- is part of your concern
15 being -- repeatedly having this experience of
16 applying a filter to your -- to your image?

17 A. Yes, I think there's negative
18 comparison to seeing other people's images that
19 have been manipulated and you may or may not be
20 aware of that, and so there is a skewed reality
21 of how other people look.

22 And then there is the potential
23 for a product to be proactively encouraging you
24 to manipulate your own image and implying that
25 you're not -- you don't look okay the way that

1 you are.

2 Q. It goes to say "Research
3 indicates that young girls believe manipulated
4 photos of peers are realistic and experience
5 increases in body dissatisfaction after being
6 exposed to edited selfies."

7 And then we have another
8 citation; is that right?

9 A. Yes.

10 Q. It continues "There is also
11 evidence that editing one's own selfies is
12 related to body dissatisfaction, eating concerns
13 and anxiety."

14 Do you see that?

15 A. Yes.

16 MS. WALSH: And if we could
17 underline "editing one's own selfies,"
18 please.

19 BY MS. WALSH:

20 Q. And that is what you were just
21 talking about; is that right?

22 A. Yes.

23 Q. And, Ms. Stewart, are you
24 aware -- or in your consideration of this issue,
25 are you aware that teenagers in particular may