

Exhibit F

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
SPRING STREET COURTHOUSE

COORDINATION PROCEEDING)
SPECIAL TITLE [RULE)
3.400]) JCCP No. 5255
IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION) For Filing Purposes
(JCCP No. 5255)) 22STCV21355
-----)
THIS DOCUMENT RELATES TO:)
Cristina Arlington Smith,)
et al. TikTok Inc., et)
al, Case No. 22STCV21355)
Los Angeles Superior)
Court)

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ATTORNEYS' EYES ONLY
VIDEO-RECORDED
EXPERT WITNESS TESTIMONY OF
NASIR MEMON, Ph.D.
(Pages 1 - 418)
Held at the Covington & Burling
415 Mission Street, San Francisco, California
Thursday, August 14, 2025, 9:29 a.m.
REPORTED BY: ELAINA BULDA-JONES, CSR 11720

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1 that and this was provided to me in an edited manner
2 and I looked at it and compared and then I said
3 okay, this says everything that I agree with and I
4 approved it, yes.

5 BY MR. OLSZEWSKI-JUBELIRER:

6 Q. So counsel, your Meta's lawyers, made
7 changes to your initial report?

8 A. Yes.

9 Q. In the JCCP?

10 A. Yes.

11 Q. To prepare a report for the -- to file in
12 the State AGs' case in the MDL?

13 A. To help me.

14 MR. CHAPUT: Object to the form.

15 THE WITNESS: Yes.

16 BY MR. OLSZEWSKI-JUBELIRER:

17 Q. Okay. Let's talk about your assignment
18 for that -- for the report that you served in the
19 MDL. This is paragraph 9 on page 6.

20 Are you there?

21 A. Yeah.

22 Q. This paragraph reads, "In connection with
23 these claims, I have been asked to review expert
24 reports submitted on behalf of Plaintiffs on May 16,
25 2025, and respond to the opinions regarding Meta's

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1 age verification systems."

2 A. Uh-huh.

3 Q. Is that correct?

4 A. Uh-huh.

5 Q. This was the full scope of your assignment
6 for your expert opinions in the MDL?

7 MR. CHAPUT: Object to form.

8 THE WITNESS: I'm sorry, I got lost on the
9 pages. So assignment 8 -- paragraph 8, is it?

10 BY MR. OLSZEWSKI-JUBELIRER:

11 Q. This is paragraph 9.

12 A. Nine.

13 Q. On page 6.

14 A. Yes. And that's what I did, yes.

15 Q. That is the full scope of your assignment
16 for preparing your expert opinions in the MDL; is
17 that correct?

18 MR. CHAPUT: Object to the form.
19 Characterization.

20 THE WITNESS: Oh, I -- I think the full
21 scope also included my opinions on the age
22 verification techniques used by Meta. And those are
23 sort of replicated here, more or less, a little
24 fashion, right, they're replicated here, reflected
25 here as well.

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1 BY MR. OLSZEWSKI-JUBELIRER:

2 Q. So your assignment was also to
3 affirmatively describe the reasonableness of Meta's
4 age verification systems; is that right?

5 MR. CHAPUT: Object to form.

6 THE WITNESS: That's the way I looked at
7 the report, yes, because it talks about the same
8 things that -- regarding -- it describes my opinions
9 about them, the age verification report.

10 BY MR. OLSZEWSKI-JUBELIRER:

11 Q. Okay. The two things that we've described
12 are responding to expert reports submitted by
13 plaintiffs in the MDL and affirmatively describing
14 the reasonableness of Meta's age verification
15 systems.

16 Is that the full scope of your assignment
17 for your expert work in the MDL?

18 MR. CHAPUT: Object to form.

19 THE WITNESS: I would think so, yes, yes,
20 that's what it was.

21 BY MR. OLSZEWSKI-JUBELIRER:

22 Q. Your expert report in the MDL discusses
23 which plaintiffs' expert reports you considered and
24 were responding to, correct?

25 A. It would, yes.

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1 Q. Okay. So if we look at page 61, for
2 example, that's part of your materials considered
3 list, and it lists five expert reports that you
4 reviewed?

5 A. Yes.

6 Q. Okay. Are you aware that only one of
7 those experts, Dr. Colin Gray, submitted a report in
8 the State AGs' case?

9 A. Yes, I -- I was informed about that, yes.

10 Q. And the other four experts did not submit
11 reports in the State AGs' case; is that right?

12 A. But -- they did not, but I was looking at
13 the -- the broader sort of landscape in my response.
14 And talked about all the experts' reports where my
15 opinions were impacted or questioned. Where I could
16 offer something. So it was given that broader
17 scope.

18 Q. Which sections of your report respond
19 specifically to Dr. Gray's opinions?

20 MR. CHAPUT: Object to form.

21 THE WITNESS: It is scattered because,
22 depending on the points, they are organized, right.
23 Dr. Gray does -- says this in this particular topic,
24 that topic, so off the top of my head I can't point
25 you, yeah.

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1 BY MR. OLSZEWSKI-JUBELIRER:

2 Q. Looking through the report, how would you
3 find out which sections of the report respond
4 specifically to Dr. Gray's opinions as opposed to
5 the opinions of other experts who were not -- did
6 not prepare reports for the State AGs' case?

7 A. I would search for his name.

8 Q. Okay. You would -- and, for example,
9 there are footnotes --

10 A. Sure.

11 Q. -- for Dr. Gray's name in the text that
12 show where the report responds specifically to
13 Dr. Gray's opinions, correct?

14 MR. CHAPUT: Object to form.

15 THE WITNESS: There are notes that specify
16 that, yes.

17 BY MR. OLSZEWSKI-JUBELIRER:

18 Q. Okay. You list several opinions in
19 paragraph 14 and 15 of your report. This is
20 page 7 -- I'm sorry, page 8.

21 A. Yeah.

22 Q. Okay. So paragraph 15 are specific
23 opinions about what you're describing in
24 paragraph 14, which is whether "Meta's
25 implementation of measures designed to prevent the