

EXHIBIT 184

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT Case No.
ADDICTION/PERSONAL INJURY 4:22-MD-03047-YGR
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

SOCIAL MEDIA CASES Filing Purposes

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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

VOLUME I

VIDEO-RECORDED DEPOSITION LIZA CRENSHAW
Wednesday, March 5, 2025
9:15 AM EST

Reported by: Denise Dobner Vickery, CRR, RMR
JOB NO.: 7134991

Page 114 1 e-mail from Sophie Vogel. 2 "Hi everyone, Quick context for 3 you Liz." 4 And that's to Liz, not to Liza; 5 right? 6 A. I think so. 7 Q. Okay. "We're expecting a negative 8 article in the UK's Sunday Telegraph that says 9 it's still very easy to find violating self-harm 10 and eating disorder content on Instagram, and 11 that we're continuing to recommend it, despite 12 our promises last year to clamp down after Molly 13 Russell. He created an account, engaged with 14 some related content, and was recommended loads 15 of accounts promoting self-harm and ED." 16 And ED stands for eating disorder? 17 A. Yes. 18 Q. "As we've worked through prepping 19 for this piece, a few things have come to light 20 around our ability to detect and take action on 21 violating eating disorder (ED) accounts, that we 22 wanted to flag and discuss. Sorry this e-mail 23 is a bit dense, but have tried to be as clear as 24 possible." 25 She lists three issues:	Page 116 1 along the lines of on backgrounds like for your 2 background knowledge. 3 Q. Okay. "We will have the same 4 issues in the EU as the SSI classifiers, and 5 won't be able to use them here in the 6 short term." 7 Number 3. "Even when we do launch 8 ED classifiers, eating disorder classifiers, 9 (outside the EU) it will only look at the 10 content level -- not at the account level: 11 According to the" -- this is sub-bullet. 12 "According to the current plan, 13 this proactive detection won't run at the 14 account level -- i.e. to look for violating 15 content in usernames or bios -- which is where 16 accounts often declare that they are 'thinspo' 17 or 'proana' accounts." 18 "The reason for this" -- second 19 bullet. Second sub-bullet. 20 "The reason for this -- as far as 21 we understand -- is that it's the view of 22 Facebook privacy policy that proactively looking 23 for this content at the account level is 24 tantamount to 'diagnosis' and would therefore 25 violate GDPR, and therefore we shouldn't do it
Page 115 1 "Specifically: 1) We're not 2 blocking violating search terms for accounts: 3 We currently block inherently violating hashtags 4 so that no results appear when you search for 5 them. These include things like #proana and 6 #thinspo. But -- we don't block any results for 7 accounts. So when you search for these terms, 8 there are no results under the 'hashtag' tab, 9 but there are endless results under the 'Top 10 Accounts' and 'Accounts' tab, and almost all are 11 violating." 12 Number 2 -- and there are two more 13 tabs. 14 Number 2. "No ED, eating 15 disorder, proactive detection at the moment: We 16 don't currently have classifiers to catch eating 17 disorder proactively -- which means it's easy to 18 find on Instagram, and is showing up in Explore 19 and accounts 'suggested for you.' The teams are 20 building these classifiers and hope to be able 21 to roll them out in H2, depending on resource -- 22 though NB." 23 What does NB stand for? 24 A. I don't actually know what NB 25 stands for. I understand it to mean something	Page 117 1 globally." 2 Third bullet. 3 "We're concerned as this means 4 these accounts -- which are clearly violating -- 5 will remain easy to find and may continue to be 6 recommended -- both to vulnerable people, and to 7 journalists who are looking to write stories." 8 All right. And then there's one 9 more sub-bullet. And then she says: 10 "We're concerned that our ability 11 to find, remove and stop recommending these 12 pro-ED accounts is going to be limited by #1 and 13 #3, and we're going to keep getting negative 14 press cycles about how we're failing to fulfill 15 the promises we've made. It's also worth noting 16 that the Molly Russell inquest will likely focus 17 on the content we were recommending her. While 18 that will be about suicide/self-harm/depressing 19 content more than eating disorder content -- 20 showing we've made improvements to avoid 21 recommending harmful content will be key." 22 Did I read that correctly? 23 A. Yes. 24 Q. Okay. And then Stephanie Otway, 25 the response of this e-mail she says:

Page 162 1 before that. 124460. 2 And the very bottom, I'll do three 3 up from the top at 10:39. So this is -- this is 4 yours. It says: 5 "This one is actually snarky" and 6 it sites a VOX article and there's a quote. 7 "None of these features are necessarily bad, but 8 they contribute to the troubling trend: 9 Facebook responds to its toughest -- to its 10 toughest structural issues by making small 11 tweaks to the user experience or to specific 12 settings. And then it's up to users to tweak 13 those settings and adjust how they use the 14 platform with the hope that, somehow, the bad 15 aspects of Facebook will just go away." 16 Mia responds: "Scrolling through 17 quickly. I actually think maybe it's good we 18 have an article like this." 19 She says: "Yaaa like this is on 20 FB the company. And good criticism of this 21 approach which we expected." 22 You say: "Yeah it definitely is. 23 This was always the reaction I personally 24 feared. And in general my concern is -- and in 25 general is my concern with controls."	Page 164 1 Instagram people." She says: "Probably around 2 youth." 3 You say: "Not unlikely." 4 Did I read that correctly? 5 A. Yes. 6 Q. So controls and you -- you 7 described -- sorry. 8 What was -- you described a 9 specific control. A QP. A QP. 10 A. Yes. So a QP is something -- it's 11 an acronym for what we call a quick promotion. 12 It's essentially a notification that shows up 13 in-app encouraging someone, a user, to use or 14 turn on a certain feature, which is relevant in 15 the context of Daisy specifically because while 16 it is a control, we did send QPs, quick 17 promotions, to people encouraging them to turn 18 it on. 19 Q. Okay. So Daisy was not a default? 20 A. It was not a default. 21 Q. Okay. 22 MR. SNEED: When you finish 23 with this document, I was just wondering. 24 It will be a good time to take our lunch 25 break, but I'll let you finish. Find a
Page 163 1 So controls as opposed to defaults 2 allow a user to change them on their account? 3 A. Generally, yes, but this also 4 doesn't take into account likely because Mia and 5 I had prior knowledge something else that we did 6 with Project Daisy, which was issue what we call 7 a QP, or a quick promotion, to all users 8 encouraging people to turn it on. 9 Q. All right. So you say -- you then 10 say: "But who am I to say." 11 Mia says: "Exactly." 12 You respond: "I do think it's 13 good to see though you're right as we push this 14 more." 15 Mia says: "Yuppp but like such a 16 hard balance." 17 At 10:46: "It does sound like the 18 'don't admit there's anything wrong with IG or 19 FB' is the current (and typical) zuck 20 direction." 21 That's Mark Zuckerberg; right? 22 A. Yes. 23 Q. She says: "I've heard multiple 24 execs mention it which makes me think he 25 recently said this in a meeting with lots of	Page 165 1 good stopping point. 2 MR. COCANOUGH: I am 3 finished and it probably -- are you guys 4 okay with lunch break now? 5 THE VIDEOGRAPHER: So go off 6 the record? 7 MR. COCANOUGH: Sure. 8 THE VIDEOGRAPHER: Okay. The 9 time is 1:05 PM and we're going off the 10 record. 11 (Whereupon, at 1:05 PM, a 12 luncheon recess was taken.) 13 14 15 16 17 18 19 20 21 22 23 24 25

Page 398 1 ERRATA SHEET 2 3 Page No. _____ Line No. _____ Change to: _____ 4 _____ 5 Page No. _____ Line No. _____ Change to: _____ 6 _____ 7 Page No. _____ Line No. _____ Change to: _____ 8 _____ 9 Page No. _____ Line No. _____ Change to: _____ 10 _____ 11 Page No. _____ Line No. _____ Change to: _____ 12 _____ 13 Page No. _____ Line No. _____ Change to: _____ 14 _____ 15 Page No. _____ Line No. _____ Change to: _____ 16 _____ 17 Page No. _____ Line No. _____ Change to: _____ 18 _____ 19 Page No. _____ Line No. _____ Change to: _____ 20 _____ 21 Page No. _____ Line No. _____ Change to: _____ 22 _____ 23 Page No. _____ Line No. _____ Change to: _____ 24 _____ 25	Page 400 1 CERTIFICATE OF REPORTER 2 DISTRICT OF COLUMBIA) 3 I, Denise Dobner Vickery, a 4 Registered Court Reporter and Notary Public of 5 the District of Columbia, do hereby certify that 6 the witness was first duly sworn by me. 7 I do further certify that the 8 foregoing is a verbatim transcript of the 9 testimony as taken stenographically by me at the 10 time, place and on the date herein set forth, to 11 the best of my ability. 12 I do further certify that I am 13 neither a relative nor employee nor counsel of 14 any of the parties to this action, and that I am 15 neither a relative nor employee of such counsel, 16 and that I am not financially interested in the 17 outcome of this action. 18 19 20 <i>Denise D. Vickery</i> 21 DENISE DOBNER VICKERY, CRR,RMR 22 Notary Public in and for the 23 District of Columbia 24 25 My Commission expires: March 14, 2028
Page 399 1 DECLARATION UNDER PENALTY OF PERJURY 2 3 4 I declare under penalty of 5 perjury that I have read the entire transcript of 6 my Deposition taken in the captioned matter 7 or the same has been read to me, and 8 the same is true and accurate, save and 9 except for changes and/or corrections, if 10 any, as indicated by me on the DEPOSITION 11 ERRATA SHEET hereof, with the understanding 12 that I offer these changes as if still under 13 oath. 14 15 Signed on the _____ day of 16 _____, 2025. 17 18 _____ 19 LIZA CRENSHAW 20 21 22 23 24 25	