

AMENDED Exhibit 10

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT) MDL No.
ADDICTION/PERSONAL INJURY) 4:22-md-3047-YGR
PRODUCTS LIABILITY LITIGATION,)
_____)

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

COORDINATION PROCEEDING) Lead Case No. for
SPECIAL TITLE [RULE 3.400]) for Filing Purposes
SOCIAL MEDIA CASES) 22STCV21355
_____)

This Document Relates to:)
)

STATE OF TENNESSEE, ex rel.)
JONATHAN SKRMETTI, ATTORNEY)

GENERAL and REPORTER) Case No.
vs.) 23-1364-IV

META PLATFORMS, INC.,)
and INSTAGRAM, LLC,)
_____)

VIDEOTAPED DEPOSITION OF NATALIE TROXEL, PH.D.
Portland, Oregon
Tuesday, March 11, 2025

Reported by: MARLA SHARP, RPR, CLR, CCRR, OR CSR
17-0446, CA CSR 11924, WA CSR 3408
Job No. 7225418

1 A Good morning.

2 Q Could you please state your full name for
3 the record?

4 A Natalie Rose Troxel.

5 Q And where do you live?

6 A 421 --

7 MR. JINDAL: Can I just quickly -- I'd ask
8 that the -- that if she's being asked to give her
9 home address, that we designate this portion of the
10 transcript confidential. I can explain the basis,
11 if we need to, off the record.

12 MS. WALSH: Yeah.

13 BY MS. WALSH:

14 Q I'm going to strike my last question and
15 just say: In what city do you live?

16 A Portland, Oregon.

17 Q Okay. And did you work for the company
18 known as Meta from 2017 to 2022?

19 A It was Facebook, but yes.

20 Q Okay. Do you understand that Facebook
21 rebranded itself as Meta sometime after you started
22 working there?

23 A Yes.

24 Q Okay. So if I use the word "Meta" today,
25 can we agree that that will refer also to the

1 company when it was known as Facebook?

2 A Yes.

3 Q Thank you. What was your position at Meta?

4 A I was a UX researcher.

5 Q Okay. Very briefly, what does "UX
6 research" mean?

7 A It's user experience research.

8 Q Okay. And we'll talk about that in more
9 detail later.

10 For the record, my name is Alex Walsh, and
11 I am a lawyer. And I represent kids who believe
12 they've been harmed by the use of Meta's products,
13 to include Facebook, Messenger, and Instagram.

14 Do you understand that?

15 A Yes.

16 Q And these young people, my clients, they
17 suffer from various mental health conditions,
18 including eating disorders, anxiety, depression,
19 suicidal ideation, and addiction.

20 Do you understand that?

21 A Yes.

22 Q And these clients of mine in this
23 litigation, they allege and they believe that it was
24 by using Meta's social media platforms that the use
25 of those platforms caused or contributed to the

1 mental health conditions they suffer.

2 Do you understand that?

3 A Yes.

4 Q Okay. Now, we're here in Portland, Oregon,
5 taking your deposition today, correct?

6 A Yes.

7 Q And why are you here today?

8 A I was requested to give my testimony by the
9 plaintiffs' attorneys.

10 Q Okay. And do you recall that we told you
11 we would serve you a subpoena unless you appeared
12 voluntarily?

13 A Yes.

14 Q Okay. And you chose to forgo being served
15 a subpoena from federal court, correct?

16 A Yes.

17 Q Okay. Are you here represented by your own
18 lawyer?

19 A Yes.

20 Q And who that is?

21 A Anit Jindal.

22 Q Great. And there are lawyers from Meta
23 here as well.

24 Do you understand that?

25 A Yes.

1 Q And did you meet with lawyers from Meta
2 before today?

3 A Yes.

4 Q Did you meet in person or by Zoom?

5 A Zoom.

6 Q Okay. And how long -- when was that
7 meeting?

8 A My attorney and I met with them yesterday
9 briefly.

10 Q Okay.

11 A And I met with some of them via Zoom two or
12 three weeks ago, I want to say, just before I
13 engaged Mr. Jindal as my attorney.

14 Q Okay. So there were two meetings with
15 Meta's lawyers, correct?

16 A Yes.

17 Q And what were the names of Meta's lawyers
18 who reached out to you the first time?

19 A Absolutely can't remember.

20 Q Okay. Was it anyone sitting in this room?

21 A I don't think so.

22 Q Okay. And do you understand that there
23 are -- one, two -- three lawyers from Meta sitting
24 in this room?

25 A Yes.

1 Q When Meta reached out to you to speak with
2 you, why did they want to talk to you, to your
3 understanding?

4 MR. EPPICH: Objection. Foundation.

5 MR. JINDAL: I'll join in.

6 MS. WALSH: Strike that.

7 MR. JINDAL: Sorry. I'll just --

8 MS. WALSH: Strike that.

9 MR. JINDAL: -- join the objection.

10 BY MS. WALSH:

11 Q What is your understanding of why Meta's
12 lawyers reached out to you?

13 A I wasn't entirely sure at first. The
14 e-mail said that I had been included on a witness
15 list and that they wanted to speak with me about
16 that.

17 Q Okay. And at that time, did Meta's lawyers
18 ask if they could represent you for this deposition?

19 A At what time?

20 Q During the first interaction that you had
21 with them.

22 A Yes.

23 Q Okay. Did they offer to represent you free
24 of charge?

25 A Yes.

1 Q And what was your response?

2 MR. JINDAL: I'm going to object. I think
3 the -- to the extent it was for the purposes of
4 obtaining legal counsel, I think that would be
5 privileged, and I'll instruct the witness not to
6 answer.

7 We can confer off the record about this if
8 you have concerns about it.

9 BY MS. WALSH:

10 Q Did you at any time understand Meta's
11 lawyers to be representing you?

12 A No.

13 Q Did you at any time seek legal advice from
14 them?

15 A I don't think so.

16 Q Did -- to your understanding, did they at
17 any time ever provide legal advice to you?

18 A I don't think so.

19 MS. WALSH: Okay. Counsel, based on that,
20 I would ask you to reconsider your instruction not
21 to -- your instruction to Ms. Troxel not to answer.

22 MR. JINDAL: Understood. You can proceed.

23 MS. WALSH: Okay.

24 BY MS. WALSH:

25 Q Okay. What was your response when Meta's

1 lawyers offered to represent you free of charge for
2 purposes of this deposition?

3 A I think I thanked them and also asked them
4 what other options I had for representation.

5 Q Okay. And can you explain to the jury --
6 well, strike that.

7 Is it fair to say that you declined Meta's
8 offer to represent you for free for purposes of this
9 deposition?

10 A Yes.

11 Q And why did you decline that offer?

12 A I felt that I would be more comfortable
13 with independent representation.

14 Q Okay. And why did you feel you'd be more
15 comfortable with independent representation?

16 A And -- having my own attorney made me feel
17 like that attorney would actually be working for me
18 and my best interests, and there wouldn't be a
19 conflict of interest with them also representing
20 Meta.

21 Q Okay. So you were concerned that there
22 could be a conflict of interest, given some of the
23 testimony you might give in this deposition, between
24 you and Meta?

25 MR. EPPICH: Object to form.

1 THE WITNESS: I thought it was possible.

2 BY MS. WALSH:

3 Q Okay. And so how long did that first
4 conversation with Meta's lawyers last?

5 A I want to say, like, half an hour, maybe --
6 maybe 45 minutes or so.

7 Q Okay. In addition to them offering to
8 represent you free of charge and you declining that
9 offer, what else did you discuss?

10 MR. EPPICH: Object to form.

11 BY MS. WALSH:

12 Q On a gener- -- just -- you can just tell me
13 generally.

14 A They gave me a little bit of information
15 about, like, what a deposition is, their
16 understanding of why I was on the witness list. I
17 think they asked some questions about when I had
18 worked at Facebook and the nature of the work I had
19 done there.

20 We talked a little bit about the logistics
21 of, you know, would this be in person or kind of
22 remote, that kind of thing.

23 Q Okay. And then you said that you met again
24 with Meta's lawyers yesterday; is that right?

25 A Yes.

1 Q And at that time you had retained your own
2 independent lawyer, correct?

3 A Yes.

4 Q And was your lawyer present for that
5 meeting?

6 A Yes.

7 Q Okay. And how long did that meeting last?

8 A About ten minutes.

9 Q Okay. Great. Have you and I met before
10 today?

11 A Briefly yesterday, yes.

12 Q Okay. And how long would you say our
13 meeting lasted?

14 A Fifteen, 20 minutes maybe.

15 Q Okay. And, just generally, what did we
16 discuss?

17 A A little bit about the deposition itself,
18 some of the logistics. You introduced yourself to
19 me. I think it was so I wouldn't be as nervous. I
20 honestly can't remember anything else about the
21 meeting.

22 Q I'm a memorable person, apparently.

23 A Sorry.

24 Q That's okay. No. That's fine. Okay.

25 Prior to meeting with me, did you meet with

1 other lawyers representing the plaintiffs in this
2 action?

3 A Yes.

4 Q And when was that?

5 A I can't remember exactly. It was several
6 months ago.

7 Q And do you remember the names of those
8 lawyers?

9 A No.

10 Q And about how long did that meeting last?

11 A I'd say it was an hour or two.

12 Q Okay. And during that meeting, did you
13 discuss some of the issues that you worked on as a
14 researcher at Meta?

15 A Yes.

16 Q Okay. Okay. Let me -- Madam Court
17 Reporter went over some of this, but I want to talk
18 a little bit more about the logistics of a
19 deposition.

20 Have you given a deposition before?

21 A No.

22 Q Okay. So I would reiterate the advice that
23 it is very important for us to not speak over each
24 other. Okay?

25 A (Nodded head.)

1 Q And the next thing is that when I ask you a
2 question, you have to answer verbally.

3 Like, now -- or do you understand that?

4 A Yes.

5 Q Okay. Good. Okay. So when I ask you a
6 question, you can't shake your head or nod your
7 head. You have to answer "yes" or "no." Okay?

8 A (Nodded head.)

9 Q And there may be times -- it's already
10 happened -- where there may be objections to some of
11 the questions that I ask. Okay?

12 A Yes.

13 Q And unless your lawyer instructs you not to
14 answer, do you understand that you're required to
15 answer the questions even though there's an
16 objection?

17 A Yes.

18 Q And we can take a break at any time that
19 you like. You just need to let me know. Okay?

20 A Okay.

21 Q The only exception to that is if there's a
22 question pending. You have to answer the question
23 before we take a break. Is that okay?

24 A Yes.

25 Q Okay. And you swore an oath to tell the

1 truth at the beginning of this proceeding; is that
2 right?

3 A Yes.

4 Q And do you understand that that's the same
5 oath that you would swear if you were testifying in
6 court before a judge and a jury?

7 A Yes.

8 Q And, in fact, you understand that this
9 videotape may well be played to a jury in the cases
10 being brought by my clients?

11 A Yes.

12 Q Okay. So we're here in Portland where you
13 live now.

14 Is Portland also where you grew up?

15 A No.

16 Q Okay. Where did you grow up?

17 A San Diego.

18 Q Okay. There's a little more rain here.

19 A A fair bit, yeah.

20 Q Okay. I'm going to ask you some questions
21 about your educational background. And to help us
22 walk through that, I'd like to hand you what we're
23 going to mark as Exhibit 1 to your deposition --

24 A Okay.

25 Q -- which is your LinkedIn profile.

1 (Deposition Exhibit 1 was marked for
2 identification.)

3 BY MS. WALSH:

4 Q And while Ms. Boldt is providing counsel
5 copies of this, could you take a look at this and
6 let us know if you understand this to be your
7 profile on LinkedIn?

8 A Yes, it looks like my LinkedIn profile.

9 Q Okay. And looking at it now, does it
10 appear to be your up-to-date profile from LinkedIn?

11 A Yes, it appears so.

12 MS. WALSH: Okay. If we could publish
13 this, please.

14 BY MS. WALSH:

15 Q And let's start with -- on the last page
16 with your education. Okay?

17 A Okay.

18 Q Where did you attend college, Ms. Troxel?

19 A I did my undergraduate at Reed College in
20 Portland, Oregon.

21 Q And what did you major in?

22 A Psychology.

23 Q And what drew you to psychology?

24 A I've always been curious about how people
25 become the people that they are and how people

1 handle the context of their environment and how that
2 shapes who we become.

3 Q Okay. So psychology was your major?

4 A Yes.

5 Q And when did you graduate from Reed
6 College?

7 A 2007.

8 Q And after you graduated from Reed College,
9 did you go on to obtain a master's degree?

10 A Yes.

11 Q And where did you do that?

12 A UC Davis.

13 Q University of California?

14 A Yes.

15 Q Okay. And what was your master's degree
16 in?

17 A Psychology.

18 Q And was it any particular type of
19 psychology?

20 A Developmental psychology.

21 Q What does "developmental psychology" mean?

22 A It's primarily focused on children and
23 adolescents, but it's how people develop and change
24 cognitively, socially, emotionally over the life
25 span.

1 Q Okay. So during that time, did you develop
2 an understanding of things that could affect how
3 children and adolescents develop?

4 A Yes.

5 Q Including things that could negatively
6 affect how children and adolescents develop?

7 A Yes.

8 MR. EPPICH: Object to form.

9 BY MS. WALSH:

10 Q During that time, did you come to
11 understand how certain factors could negatively
12 affect how children and adolescents develop?

13 MR. EPPICH: Object to form.

14 THE WITNESS: Yes.

15 BY MS. WALSH:

16 Q Okay. Now, after your master's degree, did
17 you go on to get even more education in the field of
18 developmental psychology?

19 A Yes.

20 Q And did you get your PhD?

21 A Yes.

22 Q And where did you do that?

23 A Also at UC Davis.

24 Q And was your PhD also in developmental
25 psychology?

1 A Yes.

2 Q And did you have any particular focus
3 during your PhD?

4 A Yes.

5 Q And what was that?

6 A Part of the time there, I was focused on
7 psychology and law. So children's involvement in
8 the legal system, their ability to act as witnesses
9 in court cases, for example.

10 Q Mm.

11 A But most of my work there was on children's
12 social-emotional development and the development of
13 pro-social emotions and pro-social orientations like
14 empathy and compassion.

15 Q Can you tell the jury a little bit more
16 about this term "pro-social emotions and
17 orientations"?

18 A Yes.

19 Q Please do.

20 A Okay. So pro-social emotions are things
21 like empathy, sympathy, compassion, altruism would
22 be a pro-social orientation. So they're emotions
23 and, like, clusters of behavior that orient an
24 individual towards being pro-social and trying to
25 develop community, trying to develop positive social

1 ties to the people around them.

2 Q Okay. What drew you to focus your work on
3 this concept of pro-social development?

4 A I'm not entirely sure. It just seemed
5 really nice. It was interesting. I don't think
6 that there was -- there's a lot of research -- at
7 least at the time there was a lot of research in
8 psychology that was really focused on what can go
9 wrong in development. And there was less focus on
10 what can go right and how to make things go right.

11 And I really liked the idea of having my
12 work be something that was building something and
13 was more positively oriented.

14 Q Okay. And did you write a thesis?

15 A I did.

16 Q And what was that about?

17 A Which thesis?

18 Q Ah. Did you write a doctoral thesis as
19 part of obtaining your PhD?

20 A Yes.

21 Q And what was that about?

22 A It was about attachment theory. So young
23 children's attachment with their primary caregiver
24 and how that contributes to their development of
25 empathy and how that, in turn, contributes to their

1 development or lack of their development of
2 behavioral, emotional, and psychological problems as
3 they enter early school-age.

4 Q Okay. Now, Ms. Troxel, after you completed
5 your PhD, were you interested in obtaining a job
6 that would allow you to continue to pursue your
7 interest and promote this pro-social aspect of
8 development?

9 A Yes.

10 Q And you took a job at Meta?

11 A Yes.

12 Q And did you believe that working at Meta
13 was something that would allow you to continue and
14 further develop your interest in and commitment to
15 pro-social development?

16 A I wasn't sure, but I thought it had the
17 possibility for it.

18 Q Okay. Would you have taken the job at Meta
19 if you didn't think that that possibility existed?

20 A I don't think so.

21 Q Okay. And what led you to believe that
22 working at Meta would allow you to help contribute
23 to pro-social development?

24 A I knew that billions of people used Meta
25 products and that it was something that was a part

1 of a lot of people's everyday lives. And I just
2 kind of figured somewhere in there there must be
3 something that could be done better, could be done
4 to positively affect people's lives.

5 Q Okay. And did you throughout -- well, let
6 me ask you this.

7 You told the jury earlier that you began
8 working at Meta in 2017; is that right?

9 A Yes.

10 Q And you stopped working at Meta in 2022; is
11 that right?

12 A Yes.

13 Q And during the time that you were there,
14 did you maintain your desire to use your work at
15 Meta to help contribute to pro-social development?

16 A In general, yes.

17 Q Okay. And were you able to do that?

18 A Not directly, I don't think.

19 Q Okay. Can you elaborate?

20 A I don't know if the things that I did
21 ultimately contributed to pro-social development or
22 not. I think that some of the work that I did on
23 some of the teams had the capacity to do that.

24 Q And to the extent there were impediments to
25 your work having that effect, what were they?

1 MR. EPPICH: Object to form, misstates
2 testimony.

3 BY MS. WALSH:

4 Q Strike that.

5 Did you encounter impediments to -- while
6 you were at Meta to achieving your goal of having
7 your work promote social -- pro-social development?

8 A Yeah.

9 Q And what were some of those impediments?

10 A Some of it was, I think, the nature of the
11 company. I think that I had joined the company
12 perhaps a little naive about what the company would
13 want to do and some of what the company was building
14 and how much of an influence I would be able to have
15 on things.

16 I think some of it was that technically
17 children under 13 aren't supposed to be using the
18 products. So there wasn't going to be a focus on
19 young children's development, for example.

20 And I think some of it was just the focus,
21 the prioritization of the company.

22 Q When you say the "prioritization of the
23 company," what do you mean by that?

24 A That the company wasn't prioritizing
25 positive child development.

1 Q In your experience, what was the company
2 prioritizing?

3 A Revenue.

4 Q And by "revenue," do you mean making money?

5 A Yes.

6 Q And how, in your experience, did Meta seek
7 to prioritize revenue and making money?

8 MR. EPPICH: Objection. Foundation.

9 THE WITNESS: It seemed like when I was
10 there, that Meta was trying to increase engagement,
11 trying to increase how much time people spent using
12 their apps in an effort to have more eyeballs on the
13 apps for a longer period of time, which can get them
14 more advertising revenue.

15 BY MS. WALSH:

16 Q And did you experience situations where
17 the -- well, strike that.

18 Was that frustrating to you at times?

19 A Yeah. Sure.

20 Q And did you experience specific situations
21 where research that you had done you believed could
22 translate to a positive experience -- or strike
23 that.

24 Did you experience situations where you
25 believed that research you had done could translate

1 to positive improvements of the product but that
2 research wasn't used to improve the product?

3 MR. EPPICH: Object to form.

4 THE WITNESS: What do you mean by "improve
5 the product"?

6 BY MS. WALSH:

7 Q By "improve the product" -- well, let me
8 ask you.

9 Was part of your work in UX research aimed
10 at trying to improve the social media products that
11 Meta offers?

12 MR. EPPICH: Object to form.

13 THE WITNESS: I think the work that I did
14 was aimed at better understanding the user's needs
15 and the user's experiences so that I could make
16 recommendations for how to change the product that
17 would focus more or be more aligned with users'
18 needs and experiences and expectations.

19 I don't know if we would consider that
20 improving the product or not, but --

21 BY MS. WALSH:

22 Q Did your research -- were there instances
23 where your research led you to conclude that there
24 was a change to the product that could be made that
25 could make the product better align with people's

1 expectations and needs?

2 THE WITNESS: Yes.

3 MR. EPPICH: Object to form, foundation.

4 BY MS. WALSH:

5 Q And were there situations where those
6 changes that you were -- and did you recommend
7 changes based on that research?

8 A Yes.

9 MR. EPPICH: Object to form.

10 BY MS. WALSH:

11 Q And were there situations where your
12 recommendations were rejected?

13 A Yes.

14 Q And in any of those situations, do you
15 believe that your recommendations were rejected
16 because of what you called the company's
17 prioritization on revenue?

18 MR. EPPICH: Object to form, foundation.

19 THE WITNESS: I think that those changes
20 were rejected because the changes would have limited
21 certain metrics, like engagement. And if we make
22 the inference that engagement leads to revenue, then
23 yes.

24 BY MS. WALSH:

25 Q Okay. Can you give the jury an example of

1 that?

2 A My favorite example is that when I worked
3 on Messenger, we would get very consistent feedback
4 in research. People hated a particular, like -- it
5 seems minor, but they hated a particular feature of
6 Messenger.

7 And, at least at the time, when you added a
8 new friend on Facebook, it would automatically add
9 them as a contact on Messenger.

10 Q Mm-hmm.

11 A And it would prompt the user to wave at
12 their new friend in Messenger. And, boy, people
13 hated that. They told us they hated that in almost
14 every piece of research I ever did even though it
15 was never about that.

16 And I, a couple of times, recommended,
17 "Hey, we should maybe get rid of that feature.
18 People seem to really hate it." And I was told that
19 we could not get rid of that feature because it
20 increased a metric called "two-by-two messaging."

21 Q What is two-by-two messaging?

22 A My recollection of two-by-two messaging is
23 that it's anytime there is at least two people in a
24 text exchange where each person contributes at least
25 one message. So it's, like, a volley, a

1 back-and-forth between at least two people.

2 Q Okay. And was it your understanding that
3 this was an important metric for Meta?

4 MR. EPPICH: Object to form, foundation.

5 THE WITNESS: It's my understanding that it
6 was an important metric, at least to the Messenger
7 org.

8 BY MS. WALSH:

9 Q Okay. Let's take a look -- we've started
10 already to talk about some of your work at Meta. I
11 want to do it in a more systematic way.

12 A Okay.

13 Q Before I do this, and so I don't forget,
14 you testified earlier that technically children
15 under 13 are not supposed to be using Meta's social
16 media platforms.

17 Do you recall that testimony?

18 A Yes.

19 Q During the time you worked at Meta, did you
20 become aware that children under 13 were, indeed,
21 using Meta's social media platforms?

22 MR. EPPICH: Object --

23 THE WITNESS: Yes.

24 MR. EPPICH: -- to form, foundation.

25 ///

1 THE VIDEOGRAPHER: The time is 10:25, and
2 we are off the record.

3 (Recess taken from 10:25 a.m.
4 to 10:44 a.m.)

5 THE VIDEOGRAPHER: The time is 10:44 a.m.,
6 and we are back on the record.

7 BY MS. WALSH:

8 Q Okay. Ms. Troxel, before the break, we
9 were talking about user controls.

10 Do you remember that?

11 A Yes.

12 Q Okay. And during your time at Meta, were
13 you in favor of improving the user controls that
14 were available to people who were using Meta's
15 social media platforms?

16 MR. EPPICH: Object to form.

17 THE WITNESS: Yes.

18 BY MS. WALSH:

19 Q Okay. And tell us about some of the work
20 you did that was aimed at improving the user
21 controls available to people using Meta's platforms.

22 A So after I moved from the Health team to
23 the RRL team, the Responsible Ranking and Legitimacy
24 team --

25 Q Mm-hmm.

1 A -- I started working with product teams
2 within that kind of area to figure out how to give
3 users more control over what's in their feed.

4 And some of the things that we were talking
5 about and we were testing were things like moving to
6 a chronological feed or moving to a friends and
7 family, like a -- kind of a friends-only feed or a
8 groups-only feed and giving the users the option of
9 kind of toggling between these different feeds --

10 Q Mm-hmm.

11 A -- so that they could have more control
12 over what they were seeing at any given time on
13 their news feed.

14 Q Okay. And let's start by talking about the
15 chronological feed concept.

16 And to do that, let me ask you, first, are
17 you familiar with the concept of infinite scroll?

18 A Yes.

19 Q What is infinite scroll?

20 A Infinite scroll is how Facebook and
21 Instagram are currently operating where you can just
22 scroll and scroll and scroll and there will never be
23 an end to the content.

24 Q Okay. And it's your understanding that
25 that's how Facebook operates today, correct?

1 A That's my understanding, yes.

2 Q And -- well, let's focus on the time you
3 were at Meta too.

4 Is it your understanding that's how
5 Instagram operated, with an infinite scroll, at the
6 time you were at the company?

7 A Yes.

8 Q Okay. And were there discussions around
9 potential concerns with the infinite scroll model?

10 A Yes.

11 Q And what concerns were -- what concerns did
12 you have about infinite scroll at the time you were
13 at Meta?

14 A I had concerns based on research I had done
15 and conversations I had had with other people in the
16 company that infinite scroll allowed people to use
17 the product more than they wanted or more than they
18 had intended to and that there not being an end or a
19 point where they've caught up could really
20 exacerbate people's use of or problematic use of the
21 products.

22 Q Okay. You used the term "problematic use."
23 Was that also a term of art that was used
24 at Meta while you were there?

25 A Yes.

1 Q And what does problematic -- what was --
2 what was your understanding of what that term meant,
3 as used at Meta?

4 MR. EPPICH: Object to form, foundation.

5 THE WITNESS: My understanding is that
6 "problematic use" doesn't have, like, a set amount
7 of use as problematic. It's -- depends on the
8 individual what is or isn't problematic.

9 But it's basically, for any given
10 individual, the overuse of a product, of either
11 Facebook or Instagram, in this case, where they're
12 using it more than they want or more than they
13 intend and they feel like it's having negative
14 effects or interfering with their life in some way.
15 BY MS. WALSH:

16 Q Does the concept -- when you were working
17 at Meta, did you understand the concept of
18 problematic use to relate to user controls?

19 MR. EPPICH: Object to the form,
20 foundation, calls for expert testimony.

21 THE WITNESS: To some degree, yes.

22 BY MS. WALSH:

23 Q Okay. When you were at Meta and discussing
24 the concept of problematic use, was the term
25 "addiction" also used?

1 MR. EPPICH: Object to form.

2 THE WITNESS: Probably, but I'm not sure I
3 specifically remember that.

4 BY MS. WALSH:

5 Q Okay. So you told the jury that a concern
6 you had was that the infinite scroll feature of,
7 say, Instagram could contribute to problematic use,
8 correct?

9 A Yes.

10 MR. EPPICH: Object to form.

11 BY MS. WALSH:

12 Q And so were you involved in research about
13 how -- about alternatives to infinite scroll?

14 A Yes.

15 Q And what were those alternatives?

16 A Primarily chronological feeds.

17 Q Okay. And would a chronological feed end
18 at some point?

19 MR. EPPICH: Object to form, foundation.

20 THE WITNESS: I don't know if it would end.
21 At some point, you would get caught up to the last
22 thing you had seen or, like, to the -- yeah, to the
23 last thing that you had seen on your previous
24 session.

25 ///

1 BY MS. WALSH:

2 Q Okay. And did your work at Insta- -- at
3 Meta -- did you -- did there come a time when you
4 made recommendations -- you and others made
5 recommendations about offering users alternatives to
6 infinite scroll?

7 A Yes.

8 Q And what was the response to those
9 recommendations?

10 A I believe I was laughed at the first time I
11 brought it up, but it was -- it was just a
12 nonstarter.

13 Q And do you recall who it was who laughed at
14 you when you brought it up?

15 A I think it was one of the product managers.

16 Q Okay. And after he or she was done
17 laughing, did they explain why they thought this
18 idea of moving away from the infinite scroll was so
19 funny?

20 MR. EPPICH: Object to the form.

21 THE WITNESS: Yes.

22 BY MS. WALSH:

23 Q And what was that explanation?

24 A That we wouldn't be able to do something
25 like that because it would lower engagement.

1 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

2 CASE: IN RE: SOCIAL MEDIA
3 ADOLESCENTADDICTION/PERSONAL INJURY PRODUCTS
4 LIABILITY LITIGATION

5 DEPOSITION DATE: MARCH 11, 2025

6 JOB NUMBER: 7225418

7 I, Marla Sharp, certified stenographic
8 reporter licensed in California, Oregon, and
9 Washington, hereby certify that the foregoing
10 video-recorded videoconference deposition of
11 NATALIE TROXEL, PH.D., was taken remotely before me
12 on March 11, 2025; that the witness was remotely
13 duly sworn by me; that all of the testimony,
14 colloquy, and objections made were recorded
15 stenographically by me and thereafter transcribed,
16 said transcript being a true copy of my shorthand
17 notes thereof; that review of the transcript was
18 neither requested nor waived before completion of
19 the deposition; () that the witness has failed or
20 refused to approve the transcript; and that I am
21 neither financially interested in the action nor a
22 relative or employee of any attorney of any party.

23 In witness whereof, I have subscribed my
24 name and signature this date, March 21, 2025.

25 

Marla Sharp, RPR, CLR, CCRR
CA CSR 11924, OR CSR 17-0446, WA CSR 3408