

AMENDED Exhibit 11

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

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1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA

3 IN RE: SOCIAL MEDIA ADOLESCENT :MDL NO.
4 ADDICTION/PERSONAL INJURY PRODUCTS :4:22-MD-
5 LIABILITY LITIGATION :3047-YGR

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

9 COORDINATION PROCEEDING SPECIAL TITLE :
(RULE 3,400) :
10 SOCIAL MEDIA CASES :
11 :LEAD CASE
12 :NO. FOR
13 :FILING
14 :PURPOSES
15 :22STCV21355
16 :
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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

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

DEPOSITION UNDER VIDEO EXAMINATION OF
MARK ZUCKERBERG
March 27, 2025
VOLUME I

Videotaped deposition of MARK ZUCKERBERG
taken pursuant to notice, was held at the law
offices of Covington Burling, LLP, 3000 El Camino
Real, Palo Alto, California, beginning at 10:12
a.m., Pacific, on the above date, before Michelle L.
Ridgway, a Registered Professional Reporter,
Certified Court Reporter (NJ-CCR # XI02126),
Certified Realtime Reporter, Certified Shorthand
Reporter (CA-CSR # 14592), and Notary Public.

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1	A.	Well, what the oath said, that I'm	10:13:38
2		going to tell the whole truth.	10:13:41
3	Q.	Okay. And is there any reason you	10:13:43
4		wouldn't be able to do that today?	10:13:44
5	A.	No.	10:13:45
6	Q.	All right. You're the founder and	10:13:46
7		CEO of Meta?	10:13:48
8	A.	Yes.	10:13:49
9	Q.	And you have been for the	10:13:49
10		last 21 years?	10:13:51
11	A.	Yes.	10:13:51
12	Q.	All right. Let's start at the	10:13:52
13		beginning.	10:13:53
14		You attended Harvard College,	10:13:53
15		correct?	10:13:56
16	A.	Yes.	10:13:56
17	Q.	And you left early in order to get	10:13:57
18		Facebook off the ground?	10:13:59
19	A.	Yes, you could say that. I mean, I	10:14:00
20		started Facebook when I was at -- when I was in	10:14:03
21		school. So I left in order to scale it.	10:14:05
22	Q.	All right. And in those early	10:14:11
23		years, you relied on the help and support of a	10:14:12
24		number of people, right?	10:14:15
25	A.	Yes.	10:14:16

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1	Q.	Okay.	
2	A.	And still do.	10:14:18
3	Q.	Yeah. And one of those people was	10:14:19
4	Sean Parker?		10:14:21
5	A.	Yes.	10:14:22
6	Q.	He was the first president of	10:14:23
7	Facebook?		10:14:25
8	A.	I think, technically, he was the	10:14:25
9	second president.		10:14:29
10	Q.	Okay. Were you the first?	10:14:30
11	A.	No. I think -- I don't remember	10:14:31
12	the exact corporate structure early on. But I		10:14:34
13	think Eduardo Saverin might have first held the		10:14:37
14	title.		10:14:41
15	Q.	All right. And Mr. Parker	10:14:41
16	introduced you to one of Facebook's early		10:14:42
17	investors, Peter Thiel?		10:14:44
18	A.	Yes, that's correct.	10:14:46
19	Q.	All right. And you've told the	10:14:46
20	press that Mr. Parker was pivotal in helping		10:14:47
21	Facebook transform from a college project into a		10:14:50
22	real company; is that correct?		10:14:53
23	A.	Yes.	10:14:54
24	Q.	All right. And you'd agree a lot	10:14:55
25	of the early lessons you absorbed about strategy		10:14:57

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1 came from Mr. Parker? 10:15:01

2 A. He was definitely one of my early 10:15:02

3 partners. I mean, I -- a lot of the pivotal -- 10:15:05

4 what was the exact question that you asked me 10:15:08

5 there? 10:15:09

6 MR. WARREN: Can you read 10:15:10

7 back the question, Michelle. 10:15:11

8 THE COURT REPORTER: Sure. 10:15:17

9 (Whereupon, the court 10:15:17

10 reporter read back the requested portions

11 of the transcript.) 10:15:18

12 THE WITNESS: Yeah, he was 10:15:18

13 one of my early partners in this. 10:15:21

14 I mean, I think the basic 10:15:24

15 strategy for Facebook early on was sort of 10:15:25

16 set as a product before he joined. But he 10:15:28

17 certainly helped out a lot with the 10:15:31

18 business, and he's -- he's a smart person. 10:15:33

19 BY MR. WARREN: 10:15:34

20 Q. Okay. 10:15:34

21 MR. WARREN: Can we roll 10:15:36

22 Tab 9A. 10:15:39

23 BY MR. WARREN:

24 Q. I'm going to play you a video of 10:15:40

25 you being interviewed. And we're going to hand 10:15:42

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		Page 51
1	BY MR. WARREN:	10:19:19
2	Q. Okay. I'm going to play you	10:19:19
3	Exhibit 1.	10:19:21
4	(Video playback.)	10:19:21
5	SPEAKER: Might have come	10:19:26
6	from somewhere, though, even if it was --	10:19:27
7	even if it was unintentional, right? Like,	10:19:29
8	were you influenced by Peter Thiel or Sean	10:19:31
9	Parker or people that you had met?	10:19:34
10	MR. ZUCKERBERG: Well, I was	10:19:34
11	influenced by all of these people once I	
12	met them. I hadn't really heard of Peter	10:19:37
13	Thiel before Sean introduced me. I'm	10:19:39
14	talking about like -- yeah, right after --	
15	yeah, but he was massively influential on	10:19:40
16	my thinking, right. Like, a lot of the	10:19:43
17	early lessons that I took on how to think	10:19:45
18	about strategy came from Peter and Sean.	10:19:48
19	(End video playback.)	10:19:52
20	BY MR. WARREN:	10:19:52
21	Q. Okay. That's a video of you,	10:19:52
22	correct?	10:19:53
23	A. Yes.	10:19:54
24	Q. All right. You were being	10:19:55
25	interviewed in 2013 at Y Combinator's Startup	10:19:55

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1 School? 10:19:59

2 A. I think so. 10:19:59

3 Q. Okay. And you said in the video 10:20:01

4 that a lot of the early lessons that you took on 10:20:04

5 how to think about strategy came from Peter Thiel 10:20:06

6 and Sean Parker, right? 10:20:09

7 A. Yeah. Especially business 10:20:10

8 strategy. 10:20:12

9 Q. Yeah. Okay. I'm going to play you 10:20:12

10 another clip. 10:20:13

11 I'll represent to you this is 10:20:14

12 publicly accessible on the website of the news 10:20:15

13 outlet Axios. I'm going to introduce this as 10:20:18

14 Exhibit 2. 10:20:22

15 (Document marked for

16 identification as (Meta) Zuckerberg

17 Exhibit 2.)

18 MR. WARREN: Again, I'll be 10:20:22

19 handing your counsel a copy of the 10:20:23

20 transcript for his own reference purposes. 10:20:25

21 And we will play the clip which is Tab 10A. 10:20:27

22 MR. SCHMIDT: And I'll just 10:20:35

23 object to this clip on the grounds that you 10:20:35

24 forsook the deposition of Mr. Parker, 10:20:41

25 including after the --

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1 A. This thing that is called the 10:49:13

2 "Document Slipsheet"? 10:49:18

3 Q. Yes, sir. I'll represent to you 10:49:20

4 that this is the metadata from the document. 10:49:21

5 Do you have any reason to dispute 10:49:25

6 that? 10:49:27

7 A. No. 10:49:27

8 Q. Okay. And Kenzie Snyder is 10:49:27

9 identified as the author and the custodian, 10:49:31

10 correct? 10:49:32

11 A. Yes. 10:49:35

12 Q. And she is a user experience 10:49:35

13 researcher at Meta? 10:49:39

14 A. I am not sure. I don't think I'm 10:49:40

15 familiar with her. 10:49:43

16 Q. Okay. So I'm going to show you 10:49:43

17 another exhibit. This will be Exhibit 7. 10:49:45

18 (Document marked for 10:49:48

19 identification as (Meta) Zuckerberg

20 Exhibit 7.) 10:49:59

21 BY MR. WARREN: 10:49:59

22 Q. Do you have that in front of you, 10:50:08

23 sir? 10:50:09

24 A. Yes. 10:50:09

25 Q. Okay. And I'm happy to represent 10:50:09

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1	to you that this is a screen shot of Kenzie	10:50:13
2	Snyder's LinkedIn profile.	10:50:17
3	Do you have any reason to dispute	10:50:19
4	that?	10:50:20
5	A. No.	10:50:20
6	Q. And what is her job title	10:50:21
7	identified as?	10:50:22
8	A. "Senior UX Research Leader at	10:50:23
9	Instagram."	10:50:31
10	Q. Okay.	10:50:31
11	A. "Research Lead on Threads."	10:50:31
12	Q. Okay. And she's identified as a	10:50:33
13	Ph.D., correct?	10:50:35
14	A. Yes.	10:50:36
15	Q. And can you turn to her educational	10:50:36
16	background, a couple pages. She identifies as	10:50:39
17	having a Ph.D. in social psychology from Columbia	10:50:48
18	University, correct?	10:50:51
19	A. Yes, it looks like it.	10:50:52
20	Q. Okay. And it looks like she also	10:50:53
21	has her bachelor's in psychology and journalism?	10:50:55
22	A. Yes.	10:50:59
23	Q. Okay. So let's go back to the	10:51:00
24	document that we were looking at previously,	10:51:03
25	Exhibit 6.	10:51:06

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1 A. No. 10:53:50

2 Q. All right. Have you followed the 10:53:50
3 advice of your company's researchers and alerted 10:53:52
4 people to the effect your products have on users' 10:53:55
5 brains? 10:53:58

6 MR. SCHMIDT: Object to the 10:53:59
7 characterization. 10:53:59

8 THE WITNESS: Yeah. I don't 10:54:00
9 agree with the characterization of what 10:54:02
10 you're saying. I mean, it's -- we do a lot 10:54:04
11 of research to understand how our products 10:54:05
12 work and how to make them better for people 10:54:09
13 in the community. 10:54:11

14 I don't know that any single 10:54:12
15 finding -- and none -- also I haven't read 10:54:14
16 this whole thing. So, I mean, it's not 10:54:16
17 clear that, you know, one or two 10:54:18
18 paragraphs, based on this, is -- even kind 10:54:20
19 of suggests what you're implying it 10:54:23
20 suggests. 10:54:26

21 But -- but overall -- sorry. 10:54:28
22 What was -- what were you even getting at? 10:54:30
23 What was even the question? 10:54:32

24 MR. WARREN: Yeah. I'm
25 going to move to strike that as 10:54:33

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1 nonresponsive. I don't even think you 10:54:35

2 remember my question. 10:54:36

3 BY MR. WARREN:

4 Q. Let me ask the question again. 10:54:37

5 Your researcher, who has a Ph.D. in 10:54:38

6 social psychology, says: "We need to alert people 10:54:43

7 to the effect that the product has on their brain." 10:54:45

8 My question is, did you? 10:54:48

9 MR. SCHMIDT: Object to the 10:54:51

10 harassing preamble. 10:54:52

11 THE WITNESS: Did we -- did 10:54:54

12 we what? 10:54:57

13 BY MR. WARREN: 10:54:58

14 Q. Did you alert people to the effect 10:54:58

15 that your products have on their brains? 10:55:00

16 A. Well, I mean, I think we've 10:55:02

17 published a lot of the research that we've had. I 10:55:04

18 mean, we study a lot of these different things. 10:55:06

19 I'm not sure what -- what kind of 10:55:08

20 format are you suggesting that we would -- that we 10:55:10

21 would communicate this in. I mean, we published a 10:55:14

22 lot of the research that we do. We are open in 10:55:17

23 terms of talking about how we're addressing certain 10:55:20

24 issues within the products. 10:55:22

25 But, again, I mean, I'm not even 10:55:24

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1 sure what this study is or the extent of whether 10:55:26
2 the conclusions that she's drawing here are even 10:55:31
3 accurate. So it's not clear whether there's 10:55:33
4 something specific here to alert people about. 10:55:36

5 Q. Okay. So you -- if you don't 10:55:38
6 believe these conclusions are accurate, does it 10:55:40
7 stand to reason you haven't alerted people to the 10:55:43
8 conclusions? 10:55:46

9 A. I haven't read this document or 10:55:47
10 seen it before, and the -- 10:55:49

11 Q. That's not my question. 10:55:49

12 A. Well, you asked me to read two 10:55:50
13 paragraphs, which I think are -- sound somewhat 10:55:53
14 sensationalist. And I have not had a chance to 10:55:58
15 kind of read the document. I don't know what the 10:56:03
16 rest of it says or if it even supports the 10:56:05
17 conclusions here. 10:56:07

18 Q. Okay. My question is fairly 10:56:09
19 straightforward. 10:56:10

20 Your researcher at your company 10:56:11
21 indicates here that there are certain features of 10:56:16
22 your products that are designed to exploit 10:56:19
23 insecurity or provide a dopamine rush. 10:56:21

24 I'm not asking whether you agree. 10:56:24

25 I'm not asking you to characterize that. 10:56:26

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1 I'm asking you: Is that what one 10:56:29
2 of your researchers said in this document? 10:56:31

3 Let's just start there. 10:56:33

4 A. Well, I think that that's what 10:56:34
5 these two paragraphs say -- 10:56:35

6 Q. Thank you. 10:56:37

7 A. -- without having a look at the 10:56:37
8 whole rest of the document -- 10:56:39

9 Q. Thank you. 10:56:40

10 MR. SCHMIDT: Just a second. 10:56:40

11 You can't -- you can't interrupt him in the 10:56:40
12 middle of his answer. 10:56:41

13 You can finish your answer. 10:56:42

14 THE WITNESS: I mean, I -- 10:56:43

15 without having gone through the rest of the 10:56:43

16 document, I can't really say if that's the 10:56:45

17 fullness of what the document says or if, 10:56:47

18 you know, what this person wrote here is 10:56:50

19 even the fullness of their research or what 10:56:52

20 they think. 10:56:54

21 But you're asking me to 10:56:55

22 basically comment on what someone else 10:56:56

23 wrote in a thing that I've not seen. 10:56:58

24 BY MR. WARREN: 10:57:00

25 Q. I'm not asking you to comment on 10:57:01

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1 what they wrote. I want to be really clear about 10:57:02
2 my question, okay, because I don't think this is a 10:57:05
3 particularly controversial question. 10:57:09

4 Your researcher did write in this 10:57:11
5 document -- and maybe they wrote other things in 10:57:12
6 the document, and you can take your time to look. 10:57:14

7 But your researcher did write in 10:57:16
8 this document that that are features of your 10:57:18
9 products that are designed to exploit insecurity or 10:57:20
10 provide a dopamine rush to increase the amount of 10:57:22
11 time users spend on your platform. 10:57:25

12 They wrote that, right? 10:57:27

13 A. I mean, that's what these 10:57:28
14 paragraphs say. 10:57:30

15 Q. Okay. 10:57:31

16 A. I disagree with the 10:57:32
17 characterization, and I'm not sure what's in the 10:57:33
18 rest of the document. 10:57:34

19 Q. And my question is simply this: 10:57:35

20 Have you alerted people to those 10:57:36
21 effects that they have on their brains, yes or no? 10:57:39

22 MR. SCHMIDT: Objection. 10:57:43

23 Foundation. 10:57:43

24 THE WITNESS: Yeah. And 10:57:44

25 I've tried to answer this a few times. 10:57:44

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1 First, it's not clear if 10:57:47
2 what is written here is actually true. So 10:57:48
3 in that case, I'm not sure what you'd be 10:57:51
4 trying to alert people about. 10:57:53

5 But more broadly, we study 10:57:55
6 these topics in a number of ways and 10:57:56
7 communicate about this publicly through 10:58:00
8 research that we do, through public 10:58:01
9 comments and discussions that we have. So, 10:58:04
10 more broadly, I do think that we're engaged 10:58:06
11 in discussions about these issues. 10:58:08

12 But whether we commented on 10:58:11
13 a specific thing here that I'm not even 10:58:13
14 sure is true, I -- I'm not sure. I doubt 10:58:15
15 it. 10:58:19

16 And I think if this ended up 10:58:20
17 being the way that we felt about this as a 10:58:22
18 company, we would have communicated it 10:58:24
19 more. But I generally disagree with the 10:58:25
20 characterization here. 10:58:27

21 BY MR. WARREN: 10:58:28

22 Q. Okay. So you're not aware of any 10:58:28
23 actual specific disclosure about these, in part, 10:58:31
24 because you, yourself, don't agree with them; is 10:58:34
25 that right? 10:58:39

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1 A. Yes. 10:58:39

2 Q. Okay. So, Mr. Zuckerberg, Sean 10:58:41

3 Parker is not the only former Facebook executive 10:58:45

4 who has publicly voiced concerns about the impact 10:58:48

5 of Meta's products on human psychology, is he? 10:58:52

6 MR. SCHMIDT: Objection. 10:58:56

7 Foundation. 10:58:57

8 THE WITNESS: You asked 10:58:57

9 about employees or? 10:58:58

10 BY MR. WARREN: 10:59:00

11 Q. I asked about former Facebook 10:59:00

12 executives. Let me -- let's have the question read 10:59:02

13 back. 10:59:04

14 THE COURT REPORTER: Sure. 10:59:16

15 (Whereupon, the court 10:59:16

16 reporter read back the requested portions

17 of the transcript.) 10:59:16

18 MR. SCHMIDT: Same 10:59:16

19 objection. 10:59:17

20 THE WITNESS: No. I think 10:59:17

21 there have been other employees and 10:59:19

22 executives who have had questions. 10:59:21

23 BY MR. WARREN: 10:59:23

24 Q. Okay. Let's talk about Chamath 10:59:23

25 Palihapitiya. He was another early Facebook 10:59:26

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		Page 94
1	executive?	10:59:28
2	A. Yes.	10:59:28
3	Q. He worked there from about 2007 to	10:59:28
4	2011 in the vice president role?	10:59:31
5	A. Sounds about right.	10:59:35
6	Q. Okay. And he reported to	10:59:36
7	Facebook's COO at the time, Sheryl Sandberg?	10:59:37
8	A. I think that's right.	10:59:40
9	Q. Okay. And she reported, of course,	10:59:42
10	directly to you?	10:59:44
11	A. Yes.	10:59:44
12	Q. You were in regular communication	10:59:45
13	with Mr. Palihapitiya when he worked at Facebook,	10:59:47
14	yes?	10:59:52
15	A. Yes.	10:59:52
16	Q. All right. Did you consider him a	10:59:53
17	friend?	10:59:55
18	A. I mean, we mostly worked together.	10:59:55
19	Q. Okay. Did you ever socialize	11:00:01
20	together?	11:00:03
21	A. Back then, maybe a bit.	11:00:03
22	Q. Okay. What do you remember about	11:00:06
23	that?	11:00:07
24	A. Not very much. It was a long time	11:00:08
25	ago.	11:00:10

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1 is the clip we just watched an interview of Chamath 11:05:59
2 Palihapitiya at Stanford University? 11:06:05
3 A. It seems like it. 11:06:06
4 Q. All right. And you became aware of 11:06:07
5 Mr. Palihapitiya's statements shortly after he made 11:06:09
6 them, correct? 11:06:11
7 A. I don't remember, but probably. 11:06:12
8 Q. Okay. In fact, he wrote to you 11:06:14
9 shortly after the interview we just watched? 11:06:15
10 A. I don't remember that. 11:06:17
11 Q. Okay. We're going to look at 11:06:19
12 document bearing the Bates stamp 11:06:20
13 META3047MDL-022-00046397, and we'll mark this as 11:06:25
14 Exhibit 9. 11:06:36
15 (Document marked for 11:06:36
16 identification as (Meta) Zuckerberg
17 Exhibit 9.) 11:06:38
18 BY MR. WARREN: 11:06:38
19 Q. Okay. I ask that you direct your 11:07:09
20 attention to the last page, which is an e-mail from 11:07:11
21 Mr. Palihapitiya to you, Sheryl Sandberg, and 11:07:15
22 Elliott Schrage, on December 11, 2017. 11:07:19
23 Do you agree that's what it says? 11:07:23
24 A. The last page? 11:07:25
25 Q. Yes, sir. 11:07:37

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1	All right. Do you see the e-mail	11:08:04
2	from Mr. Palihapitiya to you and other people?	11:08:05
3	A. Yes. Yes.	11:08:09
4	Q. Okay. The e-mail is dated Monday,	11:08:09
5	December 11, 2017?	11:08:11
6	A. Yes.	11:08:12
7	Q. Mr. Palihapitiya begins by saying,	11:08:12
8	he's "really sorry about all the pickup today."	11:08:14
9	Did I read that right?	11:08:17
10	A. That's what it says.	11:08:19
11	Q. And you understood that to be a	11:08:20
12	reference to news articles that picked up	11:08:21
13	Mr. Palihapitiya's comments at Stanford?	11:08:25
14	A. That's how I read it now, yes.	11:08:28
15	Q. Okay. And he also says that when	11:08:29
16	he spoke, he "didn't do a good enough job	11:08:31
17	separating me as an individual versus me as a	11:08:36
18	former executive."	11:08:38
19	Do you see that?	11:08:39
20	A. Yes. That's what it says.	11:08:40
21	Q. Okay. And he says he "could have	11:08:47
22	been crisper."	11:08:48
23	Do you see that?	11:08:49
24	A. I see it.	11:08:51
25	Q. And at no point in this e-mail does	11:08:52

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1 Mr. Palihapitiya disavow his comments about 11:08:53
2 short-term, dopamine-driven feedback loops, 11:08:56
3 correct? 11:08:59

4 MR. SCHMIDT: Object to the 11:08:59
5 characterization. 11:09:00

6 THE WITNESS: I mean, it 11:09:01
7 doesn't really discuss the substance of 11:09:06
8 what he said at all. 11:09:07

9 BY MR. WARREN: 11:09:09

10 Q. Okay. And so for that same reason, 11:09:10
11 he also does not disavow his comments about the 11:09:11
12 impact of rewards from short-term likes, like 11:09:14
13 hearts and signals, correct? Hearts and likes. 11:09:18
14 I'm sorry. 11:09:20

15 Let me re-ask the question. Let me 11:09:20
16 withdraw that. 11:09:21

17 At no point does Mr. Palihapitiya 11:09:22
18 disavow his comments about the impact of rewards 11:09:25
19 from short-term signals like hearts and likes, 11:09:27
20 correct? 11:09:29

21 A. That's correct. He isn't talking 11:09:30
22 about the substance of his comments at all here. 11:09:34

23 Q. All right. Mr. Zuckerberg, you 11:09:36
24 didn't personally respond to his e-mail, did you? 11:09:38

25 A. I don't remember. 11:09:40

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1 Q. Is there anything in this e-mail 11:09:41
2 chain indicating that you did respond to him 11:09:44
3 personally? 11:09:46

4 A. Let me read it. 11:09:46
5 Nothing that I've seen so far. I 11:10:15
6 mean, it doesn't mean that I didn't, but I don't 11:10:16
7 remember responding. 11:10:18

8 Q. Have you spoken to Mr. Palihapitiya 11:10:18
9 at all since he made his comments in 2017 at 11:10:22
10 Stanford University? 11:10:25

11 A. It's possible. 11:10:25

12 Q. Okay. Let's play a clip. 11:10:31

13 MR. WARREN: This is going 11:10:34
14 to be Exhibit 9 -- I'm sorry. This is 11:10:35
15 Exhibit 10. 11:10:39

16 (Document marked for 11:10:40
17 identification as (Meta) Zuckerberg
18 Exhibit 10.) 11:10:48

19 MR. SCHMIDT: And what page 11:10:48
20 is this? 11:10:49

21 MR. WARREN: I couldn't tell 11:10:52
22 you which page it is. I'm sorry. But we 11:10:53
23 can find that on a break for you. 11:10:55

24 MR. SCHMIDT: Okay. It 11:10:57
25 defeats the point a little bit of sharing 11:10:58

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1 hadn't spoken is because of this speech, which I 11:11:47
2 don't actually think that's the case. 11:11:51

3 Q. Okay. My question was just whether 11:11:53
4 you agreed this was a video clip of 11:11:54
5 Mr. Palihapitiya getting interviewed on The Tucker 11:11:58
6 Carlson Show. 11:12:01

7 Do you agree with that? 11:12:01

8 A. Yes. 11:12:02

9 Q. Okay. And that's a fairly recent 11:12:02
10 interview? 11:12:04

11 A. I think so, yes. 11:12:04

12 Q. Okay. And so given that you 11:12:06
13 haven't spoken to Mr. Palihapitiya since at 11:12:09
14 least 2017, stands to reason that you have not 11:12:11
15 spoken to him about his concerns about the impact 11:12:14
16 of your product on people's brains, correct? 11:12:17

17 A. That's correct. 11:12:20

18 MR. SCHMIDT: Objection. 11:12:22

19 BY MR. WARREN: 11:12:23

20 Q. Did you make any efforts to examine 11:12:23
21 whether his comments at Stanford University were 11:12:25
22 accurate? 11:12:27

23 A. Not specifically what he was 11:12:28
24 talking about. 11:12:31

25 I mean, we've studied these topics, 11:12:32

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1 like -- and I think we've talked about this a 11:12:35
2 number of times already. We've done a lot of 11:12:36
3 research into the effects of the products and how 11:12:38
4 to make them better for people. 11:12:40

5 But, I mean, I don't view him or 11:12:42
6 the things that he's saying, at a high level, as 11:12:44
7 something that, in particular, need to be 11:12:46
8 investigated. 11:12:48

9 Q. Okay. And just to be clear, my 11:12:49
10 question wasn't about your company. My question 11:12:52
11 was about you. 11:12:55

12 Did you personally make any effort 11:12:55
13 to investigate the accuracy of what 11:13:00
14 Mr. Palihapitiya was saying about the impact of 11:13:03
15 your products on people's brains? 11:13:06

16 MR. SCHMIDT: Objection. 11:13:08
17 Asked and answered. 11:13:09

18 THE WITNESS: Not other than 11:13:10
19 following up on the research that we do 11:13:11
20 internally. And when I -- when I'm 11:13:13
21 personally following up on something, 11:13:16
22 it's -- I'm not the one who is personally 11:13:18
23 doing the research at the company. 11:13:20

24 The way that I follow up on 11:13:22
25 it is by having a program at the company 11:13:23

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1 that can study and do research to 11:13:25
2 understand things so we can make our 11:13:27
3 products better. 11:13:29

4 BY MR. WARREN: 11:13:30

5 Q. All right. Can you please turn to 11:13:30
6 the first page of this document. 11:13:32

7 I'd like to direct your attention 11:13:34
8 to the e-mail from Sheryl Sandberg sent on Tuesday, 11:13:37
9 December 12, 2017. 11:13:43

10 Do you see that? 11:13:44

11 A. The fourth one down? 11:13:44

12 Q. That's correct. 11:13:52

13 A. Yes. 11:13:54

14 Q. And she writes to several other 11:13:54
15 employees of Facebook: "He is writing something. 11:13:58
16 If we want to influence that, we should pick out 11:14:03
17 what he said and what we think is correct. For 11:14:06
18 example, on dopamine, this is explosive." 11:14:08

19 Did I read that correctly? 11:14:11

20 A. Yes. 11:14:13

21 Q. Did you speak to Ms. Sandberg about 11:14:14
22 whether Mr. Palihapitiya's comments about dopamine 11:14:17
23 were explosive? 11:14:20

24 MR. SCHMIDT: Objection. 11:14:21

25 Foundation. 11:14:22

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1 specific things, no. 12:34:07

2 Q. Okay. Mr. Zuckerberg, you have 12:34:09

3 appeared before congressional committees on a 12:34:11

4 number of occasions, correct? 12:34:14

5 A. Yes. 12:34:15

6 Q. And you've been asked by members of 12:34:16

7 Congress about the topic of social media addiction, 12:34:18

8 correct? 12:34:21

9 A. I think so. 12:34:21

10 Q. In fact, you were asked whether 12:34:24

11 your products were addictive during a hearing of 12:34:26

12 the House of Representatives Energy and Commerce 12:34:28

13 Subcommittee, correct? 12:34:34

14 A. I don't remember specifically, but 12:34:34

15 I think this topic has come up at some of the 12:34:36

16 congressional hearings I've testified at. 12:34:39

17 Q. Okay. I'd like to play you a clip 12:34:42

18 from that hearing, which we'll mark for 12:34:44

19 identification as Exhibit 19. 12:34:46

20 MR. WARREN: Again, Counsel, 12:34:49

21 we'll be handing you a transcript. 12:34:50

22 MR. SCHMIDT: Do you want to 12:34:52

23 see the transcript of these as we show 12:34:53

24 them? Would that help you? 12:35:00

25 THE WITNESS: I mean, either 12:35:00

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		Page 154
1	way.	12:35:02
2	MR. SCHMIDT: Okay. If you	12:35:02
3	want them, let me know.	12:35:02
4	THE WITNESS: Okay.	
5	MR. SCHMIDT: Can you tell	
6	me what page you're playing from.	
7	TRIAL TECH: 72.	
8	MR. SCHMIDT: Okay.	12:35:04
9	MR. WARREN: And the clip	12:35:04
10	I'll be playing is also available online,	12:35:07
11	on C-SPAN's website.	12:35:08
12	Can we roll 29A.	12:35:11
13	(Document marked for	12:35:13
14	identification as (Meta) Zuckerberg	
15	Exhibit 19.)	12:35:14
16	(Video playback.)	12:35:14
17	SPEAKER: In 1994,	12:35:16
18	Democratic congressman Henry Waxman chaired	12:35:18
19	a hearing with the CEOs of our nation's	12:35:20
20	largest tobacco companies. During his	12:35:22
21	opening statement he stated, and I quote,	12:35:24
22	"Sadly, this deadly habit begins with our	12:35:29
23	kids. In many cases they become hooked	12:35:32
24	quickly and develop a lifelong addiction	12:35:35
25	that is nearly impossible to break."	12:35:38

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1	So, Mr. Zuckerberg and	12:35:40
2	Mr. Dorsey, you profit from your company's	12:35:42
3	hooking users to your platforms by	12:35:46
4	capitalizing on their time. So, yes or no,	12:35:48
5	do you agree that you make money off of	12:35:52
6	creating an addiction to your platforms?	12:35:55
7	Mr. Zuckerberg?	12:35:58
8	MR. ZUCKERBERG:	12:35:59
9	Congressman, no, I don't agree with that --	12:36:00
10	SPEAKER: Thank you. That's	12:36:03
11	all I needed, a yes or a no.	12:36:04
12	(End video playback.)	12:36:06
13	BY MR. WARREN:	12:36:08
14	Q. So that we have a clear record,	12:36:09
15	Mr. Zuckerberg, that was a video clip of you	12:36:10
16	testifying before Congress on March 25th of 2021,	12:36:12
17	yes?	12:36:17
18	MR. SCHMIDT: And if I may	12:36:17
19	just object that he wasn't allowed to	12:36:18
20	answer your question, in the question that	12:36:20
21	he was asked.	12:36:22
22	MR. WARREN: Well, there's	
23	not -- there's not much I can do about	12:36:22
24	that.	12:36:25
25	MR. SCHMIDT: You could use	12:36:27

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1 a question. There is a lot to answer. But 12:36:28

2 we can put that aside. 12:36:28

3 MR. WARREN: I doubt we'd be 12:36:28

4 able to find a question where he wasn't 12:36:31

5 interrupted by a senator. It's harder than 12:36:33

6 you think. 12:36:35

7 MR. SCHMIDT: I don't doubt 12:36:36

8 that. 12:36:37

9 BY MR. WARREN: 12:36:37

10 Q. Mr. Zuckerberg, so we have a clear

11 record, that's a video clip of you testifying 12:36:37

12 before Congress, yes? 12:36:39

13 A. Yes. 12:36:40

14 Q. Okay. And that was March 25, 2021, 12:36:40

15 thereabouts? 12:36:43

16 A. I don't remember the exact date. 12:36:44

17 Q. Okay. And, of course, when you 12:36:45

18 testified, you understood your obligation not to 12:36:48

19 knowingly provide false information to Congress, 12:36:51

20 yes? 12:36:54

21 A. Yes, of course. 12:36:54

22 Q. Okay. And, similarly, you 12:36:55

23 understood your obligation not to knowingly conceal 12:36:56

24 information from Congress? 12:37:00

25 A. Yes. 12:37:00

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1	off Senator Ossoff.	12:50:54
2	MR. SCHMIDT: Noted. I'll	12:50:58
3	object to showing him the clip where he	12:50:59
4	couldn't explain what he was trying to say.	12:51:01
5	MR. WARREN: All right.	12:51:02
6	BY MR. WARREN:	12:51:02
7	Q. Mr. Zuckerberg, that was you	12:51:02
8	answering questions at the hearing of the Senate	12:51:03
9	Judiciary Committee or some committee of the	12:51:08
10	Senate?	12:51:10
11	A. Yes, I think so.	12:51:11
12	Q. All right. So three times before	12:51:11
13	Congress you've testified under oath that you don't	12:51:13
14	give your teams goals of increasing the amount of	12:51:15
15	time people spend on your platforms, correct?	12:51:18
16	A. Yes.	12:51:20
17	Q. Okay. But isn't it the truth that	12:51:21
18	your company has expressly set goals, not just for	12:51:22
19	how much time people spend on your platform, but	12:51:27
20	how much time teenagers spend on your platforms?	12:51:29
21	A. I mean, maybe in the past, before	12:51:34
22	we changed that.	12:51:36
23	But for several years at this	12:51:37
24	point, our practice is not to give teams goals to	12:51:40
25	specifically optimize or increase time spent.	12:51:44

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1 The -- I mean, I think that my 12:51:47
2 answer, when I was talking -- answering the 12:51:50
3 senator's questions here, characterizes my views on 12:51:52
4 this pretty clearly. 12:51:56

5 But I think there's a very big 12:51:58
6 difference between building something that is 12:52:00
7 useful and, therefore, people want to use it more 12:52:01
8 because it's useful, versus giving a team a goal to 12:52:04
9 try to increase the amount of time that people 12:52:07
10 spend. 12:52:10

11 So if we build something that's 12:52:10
12 useful and, therefore, people want to use it more, 12:52:12
13 I don't think that's bad. That's good, right? You 12:52:15
14 built something that's more useful in people's 12:52:19
15 lives. 12:52:21

16 But that's pretty different from 12:52:21
17 saying that we're going to give people -- the teams 12:52:23
18 a goal, specifically, to, like, make it so people 12:52:26
19 are spending more time on the products. 12:52:29

20 Q. Okay. I'm going to show you a 12:52:30
21 document bearing the Bates stamp 12:52:32
22 META3047MDL-046-00012613. 12:52:37

23 And we're done with those, 12:52:44
24 Mr. Zuckerberg. 12:52:46

25 We'll mark this one as Exhibit 23. 12:52:46

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1 A. It looks like it. Give me a chance 12:57:05
2 to read what I wrote here. 12:57:07

3 Okay. 12:57:46

4 Q. You can put that document to one 12:57:47
5 side. 12:57:49

6 I'm now handing you a document 12:57:49
7 bearing the Bates stamp META3047MDL-003-00133741. 12:57:52
8 We'll mark this for identification as Exhibit 24. 12:58:04

9 (Document marked for 12:58:07
10 identification as (Meta) Zuckerberg
11 Exhibit 24.) 12:58:07

12 BY MR. WARREN: 12:58:07

13 Q. Okay. This is a copy of an 12:58:22
14 e-mail -- well, let me withdraw that. 12:58:23

15 I'll represent to you that this 12:58:26
16 document was produced to us by Meta's lawyers and 12:58:28
17 came from your company's internal files. 12:58:31

18 Do you have any reason to dispute 12:58:34
19 that? 12:58:35

20 A. No. 12:58:35

21 Sorry. I got a few copies of this. 12:58:36

22 Q. Okay. This is a copy of an e-mail 12:58:39
23 you sent to Susan Li and David Wehner, correct? 12:58:44

24 A. It looks like it, yes. 12:58:48

25 Q. And the subject of this e-mail is 12:58:49

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1 "H1 '16 Company Goals: Feedback required," yes? 12:58:51

2 A. Yes. 12:58:56

3 Q. And H1 '16 will be referring to the 12:58:59

4 first half of 2016, yes? 12:59:04

5 A. Yes. 12:59:06

6 Q. Okay. And in this e-mail you set 12:59:06

7 out some company goals for the next three years. 12:59:07

8 That's why it says, "3 Year Arc," correct? 12:59:10

9 A. I guess so. I mean, I really don't 12:59:15

10 remember this that specifically. But that, I 12:59:24

11 think, is what -- what it looks like. 12:59:27

12 Q. Okay. And the first goal is 12:59:29

13 25 billion in revenue, yes? 12:59:32

14 A. It looks like it. 12:59:34

15 Q. And the second goal is time spent 12:59:37

16 increases by 12 percent, correct? 12:59:39

17 A. Yes. 12:59:41

18 Q. Okay. You can put that document to 12:59:42

19 one side. 12:59:44

20 I'm going to hand you a document 12:59:45

21 bearing the Bates stamp META3047MDL-003-00134687. 12:59:47

22 We'll mark this for identification as Exhibit 25. 12:59:58

23 (Document marked for 13:00:01

24 identification as (Meta) Zuckerberg

25 Exhibit 25.) 13:00:02

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1 BY MR. WARREN: 13:00:02

2 Q. Once again, I'll represent to you 13:00:19

3 that this was produced to us by Meta's lawyers and 13:00:21

4 came from your company's internal files. 13:00:23

5 Any reason to dispute that? 13:00:26

6 A. No. 13:00:27

7 Q. Okay. This is an e-mail from [REDACTED] 13:00:28

8 [REDACTED] to you and several others, correct? 13:00:34

9 MR. SCHMIDT: Object to 13:00:40

10 characterization. 13:00:41

11 THE WITNESS: It looks like 13:00:44

12 it. 13:00:44

13 MR. SCHMIDT: It looks like 13:00:46

14 it's from -- maybe I misheard your 13:00:47

15 question. Let me withdraw it. I'm sorry. 13:00:48

16 I misheard your question. 13:00:50

17 BY MR. WARREN: 13:00:52

18 Q. I'm sorry. What was the answer, 13:00:52

19 Mr. Zuckerberg? 13:00:54

20 Let me get -- 13:00:54

21 A. I think it was yes, but I... 13:00:54

22 Q. Let's just get a clean record. 13:00:57

23 Mr. Zuckerberg, this is an e-mail 13:00:59

24 from [REDACTED] to you and several others, 13:01:00

25 correct? 13:01:02

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1 A. Yes, it looks like it. 13:01:03

2 Q. Okay. And what was [REDACTED] 13:01:04
3 role in the company? 13:01:06

4 A. I think he might have had a few 13:01:10
5 different roles, so I don't -- I don't remember 13:01:12
6 exactly what his role was at this point. 13:01:14

7 Q. What are the roles that you can 13:01:16
8 recall? 13:01:17

9 A. I think he came in and was 13:01:18
10 originally working on partnerships. 13:01:23

11 Q. Okay. And [REDACTED] -- 13:01:28

12 A. No, no, no. I'm sorry. I think 13:01:31
13 he -- that's a different person that I have in 13:01:33
14 mind. I think he might have been -- I think 13:01:34
15 [REDACTED] this [REDACTED] was a product manager. 13:01:38

16 Q. Okay. And I'm sorry to cut you 13:01:40
17 off. I thought you were done. 13:01:42

18 [REDACTED] is sending you materials 13:01:43
19 for a discussion the following day about team 13:01:46
20 strategy and goals, correct? 13:01:50

21 A. It looks like it. 13:01:51

22 Q. Okay. He says in the third 13:01:55
23 paragraph: "We focused this conversation on the 13:01:56
24 key 2017 bets that we believe are most likely to 13:01:59
25 set us up for success with teens and kids," yes? 13:02:03

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1	A.	That's what it says.	13:02:05
2	Q.	Okay. Let's take a look at the	13:02:14
3		deck, which is two pages forward. I'll represent	13:02:16
4		to you this is the attachment to that e-mail.	13:02:21
5		MR. WARREN: Counsel, will	13:02:27
6		you accept that representation?	13:02:29
7		MR. SCHMIDT: Yes, if you're	13:02:30
8		representing it.	13:02:31
9		MR. WARREN: Indeed I am.	13:02:32
10		BY MR. WARREN:	13:02:33
11	Q.	Mr. Zuckerberg, the title of this	13:02:35
12		deck is "2017 Teens Strategic Focus," yes?	13:02:37
13	A.	It looks like it.	13:02:41
14	Q.	I'll have you flip a couple pages	13:02:43
15		to the page ending in 692.	13:02:45
16	A.	Okay.	13:03:17
17	Q.	Okay. What's the title of this	13:03:17
18		slide?	13:03:19
19	A.	"2017 Top-Line Goal."	13:03:19
20	Q.	And what's the strategic goal	13:03:23
21		identified?	13:03:25
22	A.	It says, "Time Spent Share."	13:03:25
23	Q.	How is that defined?	13:03:30
24	A.	I don't know. Does it say here?	13:03:32
25	Q.	Well, underneath, it says: "What	13:03:37

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1 percent of all, under, or equal to 18 smartphone 13:03:41
2 and tablet time is an FB experience?" 13:03:45
3 Do you see that? 13:03:48
4 A. Yes. 13:03:48
5 Q. Okay. What's the operational 13:03:49
6 metric identified for this goal? 13:03:52
7 A. I mean, I'm just reading what it 13:03:53
8 says here, but it says aggregate total time spent. 13:03:57
9 Q. And there's an example of that 13:04:00
10 underneath, right, 15 billion minutes per day 13:04:01
11 across the Facebook family? 13:04:04
12 A. Yes. 13:04:05
13 Q. Okay. You can put that document to 13:04:06
14 one side. 13:04:08
15 Mr. Zuckerberg, as part of Meta's 13:04:08
16 strategic focus on teens, it set specific 13:04:12
17 quantitative goals for how much time teenagers 13:04:17
18 spend on its platforms, correct? 13:04:21
19 A. I mean, this document -- and I 13:04:23
20 think how we discussed this in 2017 and before -- 13:04:26
21 yes, I think we focused on time spent as one of the 13:04:31
22 main engagement goals. 13:04:35
23 And I think after some time during 13:04:37
24 2017 and beyond for -- at this point -- about the 13:04:39
25 last ten years, we've primarily focused on other 13:04:43

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1	metrics and have retired giving teams goals based	13:04:47
2	on time spent.	13:04:52
3	Q. Okay. I'm going to hand you a	13:04:53
4	document Bates-stamped META3047MDL-014-00382310.	13:04:54
5	MR. WARREN: We'll mark this	13:05:06
6	for identification as Exhibit 26.	13:05:07
7	(Document marked for	13:05:09
8	identification as (Meta) Zuckerberg	
9	Exhibit 26.)	13:05:10
10	MR. WARREN: And the	13:05:10
11	document also includes the attachment,	13:05:10
12	which begins with the next consecutive	13:05:12
13	Bates number.	13:05:15
14	BY MR. WARREN:	13:05:16
15	Q. This is an e-mail to you from 2017,	13:05:23
16	attaching a number of pre-reads ahead of meetings	13:05:26
17	the following day, correct?	13:05:29
18	A. It looks like it.	13:05:30
19	Q. Okay. And I'll represent that I've	13:05:34
20	included in this exhibit the first listed	13:05:36
21	attachment, which is identified as "17_H2 2017	13:05:38
22	Instagram Strategy.pdf."	13:05:46
23	Can you turn to that attachment,	13:05:48
24	please.	13:05:51
25	MR. WARREN: And, Counsel,	13:05:51

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		Page 184
1	will you accept that representation?	13:05:52
2	MR. SCHMIDT: I don't know	13:05:53
3	that you need me to, but yes, I will, if	13:05:53
4	you're making it.	13:05:57
5	MR. WARREN: All right.	13:05:57
6	BY MR. WARREN:	13:05:58
7	Q. This is called "H2 2017 Instagram	13:05:58
8	Strategy," yes?	13:06:01
9	A. Yes, it looks like it.	13:06:03
10	Q. And it includes a section called	13:06:08
11	"Goals."	13:06:11
12	Do you see that? It's just on the	13:06:12
13	first page.	13:06:38
14	A. Oh. Oh, right at the top. Okay.	13:06:38
15	Q. Okay. So just so we have a clean	13:06:43
16	record, it says, "H2 2017 Instagram Strategy," and	13:06:45
17	then it says "Goals," correct?	13:06:49
18	A. Yes. That looks like the first	13:06:52
19	section.	13:06:54
20	Q. Okay. And Row 4 says, "U.S. teen	13:06:54
21	DAP Accounts."	13:06:58
22	Do you see that?	13:06:59
23	A. Yes.	13:07:00
24	Q. And DAP means daily active people,	13:07:03
25	yes?	13:07:07

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		Page 185
1	A. Yes.	13:07:07
2	Q. So that's a measure of how many	13:07:07
3	people are on the platform in any given day?	13:07:10
4	A. Yes.	13:07:12
5	Q. Okay. And the goal set	13:07:12
6	is 12.1 million U.S. teen daily active people	13:07:19
7	accounts, correct?	13:07:24
8	A. It looks like it.	13:07:24
9	Q. Okay. And Row 10 says, "Time	13:07:25
10	spent," yes?	13:07:27
11	A. Yes.	13:07:28
12	Q. And the goal set is 28 minutes?	13:07:31
13	A. Yes.	13:07:35
14	Q. Please flip to the page ending in	13:07:39
15	2310.	13:07:42
16	Do you see the heading titled,	13:07:51
17	"Grow Time Spent Through Interests"?	13:07:54
18	A. I do.	13:07:57
19	Q. And the first line under the table	13:07:58
20	says: "We have increased time spent by +16 percent	13:07:59
21	in the last year through feed ranking and other	13:08:05
22	wins."	13:08:12
23	Do you see that?	13:08:13
24	A. I do.	13:08:13
25	Q. And then look at the table. This	13:08:14

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		Page 186
1	indicates that the first half goal is 28 minutes	13:08:15
2	and the second half goal is 31 minutes, correct?	13:08:19
3	A. It looks like it, yes.	13:08:21
4	Q. In other words, the goal is to	13:08:28
5	increase time spent?	13:08:29
6	A. Again, if you're asking about this	13:08:31
7	document from 2017, then at the time, yes. And	13:08:34
8	since then, we have deprecated having time spent	13:08:38
9	goals.	13:08:43
10	Q. Okay. You can put that document to	13:08:43
11	one side.	13:08:45
12	I'm showing you a document bearing	13:08:46
13	the Bates stamp META3047MDL-050-00330868.	13:08:47
14	(Document marked for	13:09:01
15	identification as (Meta) Zuckerberg	
16	Exhibit 27.)	13:09:01
17	MR. WARREN: And I'll be	13:09:01
18	introducing -- I'll be marking this for	13:09:02
19	identification as Exhibit 27.	13:09:05
20	And it includes one of the	13:09:06
21	attachments. That attachment begins with	13:09:07
22	the Bates number META3047MDL-050-00330880.	13:09:11
23	BY MR. WARREN:	13:09:25
24	Q. Okay. So, Mr. Zuckerberg, this is	13:09:26
25	an e-mail sent to you on June 3, 2019, correct?	13:09:29

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1 Q. And that's what you were hoping to 13:16:41
2 achieve for Instagram by 2026, yes? 13:16:43

3 A. Yeah. I mean, I think that these 13:16:48
4 are the basic qualitative statements around if 13:16:49
5 we're -- if we're succeeding. And if our strategy 13:16:53
6 is delivering the value for people that we expect 13:16:55
7 it to, then these are some of the outcomes that we 13:16:58
8 might expect to see in the world. 13:17:01

9 Q. Mr. Zuckerberg, if users spend more 13:17:03
10 time on their Instagram or Facebook feed, then, 13:17:09
11 generally speaking, they'll see more ads, yes? 13:17:13

12 A. Generally speaking, yes. 13:17:15

13 Q. And that's also true for Instagram 13:17:17
14 Reels and Explore, right? If users spend more time 13:17:19
15 on those surfaces, they'll see more ads, yes? 13:17:22

16 A. In general, yes. I mean, it varies 13:17:25
17 per person and by a bunch of different categories. 13:17:28
18 But in general, yes. 13:17:31

19 Q. And you don't deny that the more 13:17:33
20 ads get seen, the more ad revenue Meta earns, yes? 13:17:35

21 MR. SCHMIDT: Objection. 13:17:41

22 Foundation. 13:17:42

23 THE WITNESS: There are 13:17:42
24 other things that go into -- I mean, our 13:17:43
25 revenue is mostly based on whether people 13:17:44

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		Page 195
1	engage with the ads, not how many ads are	13:17:47
2	seen.	13:17:50
3	But, in general, the more	13:17:50
4	ads that people see, the more opportunities	13:17:52
5	we have to show people relevant ads.	13:17:56
6	BY MR. WARREN:	13:17:57
7	Q. Which means the more advertising	13:17:58
8	revenue you have a chance to earn, yes?	13:17:59
9	MR. SCHMIDT: Objection.	13:18:02
10	THE WITNESS: Yeah. In	13:18:03
11	general, from a business perspective, I	13:18:03
12	think that that's roughly correct.	13:18:05
13	BY MR. WARREN:	13:18:07
14	Q. Okay. Mr. Zuckerberg, isn't it	13:18:07
15	true that the design of Facebook and Instagram	13:18:10
16	makes it hard for addicted users to quit?	13:18:13
17	A. I don't agree with that.	13:18:17
18	Q. Okay. Let's turn back to an	13:18:19
19	exhibit that we looked at earlier. And this is	13:18:22
20	Exhibit 14.	13:18:29
21	We're going to go to the page	13:18:35
22	ending in 203 of this document.	13:18:52
23	A. 203?	13:19:09
24	Q. Yes, sir.	13:19:10
25	A. Okay.	13:19:13

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1	Q.	You can put that document to one	14:08:01
2		side.	14:08:04
3		I'm going to hand you a document	14:08:12
4		bearing the Bates stamp META3047MDL-074-00027496.	14:08:15
5		We'll mark this for identification as Exhibit 31.	14:08:20
6		(Document marked for	14:08:26
7		identification as (Meta) Zuckerberg	
8		Exhibit 31.)	14:08:26
9	BY MR. WARREN:		14:08:26
10	Q.	And, again, I'll represent that	14:08:27
11		this was produced by Meta's lawyers and obtained	14:08:28
12		from your company's internal files.	14:08:30
13		Do you have any reason to dispute	14:08:32
14		that?	14:08:33
15	A.	No.	14:08:34
16	Q.	Have you seen this document before?	14:08:39
17	A.	I don't think so.	14:08:40
18	Q.	All right. The document is titled,	14:08:46
19		"Problematic Use On-Platform Measurement," correct?	14:08:48
20	A.	Yes.	14:08:52
21	Q.	What's the date of the document?	14:08:57
22	A.	It's a range, from December 2022 to	14:09:00
23		January 2023.	14:09:08
24	Q.	Okay. And it indicates on the	14:09:08
25		front page that it was authored by Elena Davis and	14:09:11

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1 Josh Latshaw. Do you know who those people are? 14:09:15

2 A. I'm not familiar with them. 14:09:19

3 Q. Do you have any reason to dispute 14:09:22

4 that they are X-Meta Well-being researchers, as 14:09:23

5 suggested underneath? 14:09:30

6 A. Not particularly. 14:09:31

7 Q. And unfortunately this document was 14:09:32

8 produced to us without page numbers. 14:09:34

9 MR. WARREN: So, Paul, we've 14:09:37

10 taken the liberty of adding those in the 14:09:38

11 bottom right-hand corner. I take it you 14:09:40

12 won't object to that? 14:09:44

13 MR. SCHMIDT: I will not 14:09:44

14 object to that. Thank you. 14:09:46

15 MR. WARREN: All right.

16 MR. SCHMIDT: Thank you for

17 flagging.

18 MR. WARREN: Yes. 14:09:47

19 BY MR. WARREN: 14:09:47

20 Q. Please flip to Page 2, 14:09:47

21 Mr. Zuckerberg. 14:09:49

22 A. Okay. 14:09:57

23 Q. Okay. Please direct your attention 14:09:57

24 to Number 2 in the left-hand column. 14:09:59

25 This indicates that your 14:10:03

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1 researchers surveyed approximately 30,000 youth and 14:10:04
2 30,000 adult Instagram users in 12 countries, 14:10:08
3 correct? 14:10:12

4 A. That's what it says. 14:10:12

5 Q. That's more than 24 people? 14:10:16

6 A. Definitely. 14:10:18

7 Q. And the goal here was to advance 14:10:21
8 Meta's "understanding and measurement of potential 14:10:23
9 problematic use on our platforms," correct? 14:10:26

10 A. That's what it says, yes. 14:10:28

11 Q. If you look at the first finding, 14:10:34
12 it indicates that: "Users' perceived control can 14:10:37
13 be validly measured across age cohorts, assessing 14:10:43
14 low attentiveness and low capability to change 14:10:47
15 platform use." 14:10:55

16 Do you see that? 14:10:56

17 MR. SCHMIDT: I think you 14:10:56
18 missed some words. 14:10:57

19 MR. WARREN: Well, I'll read 14:10:58
20 it again since I may have missed some 14:11:00
21 words. 14:11:02

22 BY MR. WARREN: 14:11:02

23 Q. Mr. Zuckerberg, the first finding 14:11:03
24 in this document is that "Users' perceived control 14:11:04
25 can be validly measured across age cohorts with 14:11:06

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1 questions assessing low attentiveness around 14:11:09
2 platform use (i.e., spending more time, checking 14:11:12
3 and consuming content without realizing it) and low 14:11:16
4 capability to change platform use (i.e., low 14:11:20
5 confidence in ability to reduce time, checking, or 14:11:23
6 interactions).\" 14:11:25

7 Did I get that correctly? 14:11:26

8 A. Yes, you read that correctly. 14:11:28

9 Q. So that's a -- that's a big 14:11:29
10 sentence, so let me break that down. 14:11:30

11 Low attentiveness here is defined 14:11:32
12 as spending more time checking and consuming 14:11:37
13 content without realizing it, yes? 14:11:39

14 A. It seems like that's how they are 14:11:41
15 defining it, yes. 14:11:54

16 Q. Okay. And low capability to change 14:11:55
17 platform use is defined as low confidence in 14:11:57
18 ability to reduce time, checking or interactions; 14:12:01
19 is that fair? 14:12:05

20 A. That seems to be how they are 14:12:06
21 defining it, yes. 14:12:10

22 Q. Okay. And it looks like what they 14:12:12
23 are doing is measuring those two phenomena across 14:12:13
24 age cohorts; is that fair? 14:12:19

25 A. They say they -- that it has been, 14:12:20

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1 can be, validly measured across age cohorts, but 14:12:47

2 I'm not sure how they do that. 14:12:50

3 Q. Okay. Let's take a look at how 14:12:54

4 they did that. Can you please turn to Page 9. 14:12:55

5 This page identifies the specific 14:13:09

6 survey questions that your researchers asked 14:13:12

7 related to low attentiveness and low capability, 14:13:15

8 correct? 14:13:19

9 A. Sorry. I'm still just reading. 14:13:19

10 Q. Of course. Take your time. 14:13:27

11 A. Okay. I'm on Page 9. 14:13:55

12 Q. All right. Thank you, sir. 14:13:56

13 This page identifies the specific 14:13:57

14 survey questions that your researchers asked 14:13:59

15 related to low attentiveness and low capability, 14:14:02

16 correct? 14:14:05

17 A. Does it say that these are the 14:14:05

18 questions they asked? 14:14:21

19 Q. The heading indicates that they 14:14:22

20 were conducting an on-platform survey. 14:14:26

21 Do you agree with that? 14:14:29

22 A. Yes. I agree that they said that 14:14:31

23 they measured them in an on-platform survey. 14:14:36

24 Q. All right. And does that suggest 14:14:40

25 to you that the questions that follows are the 14:14:40

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1 A. Yes. 14:28:28

2 Q. Those were your words, yes? 14:28:28

3 A. Yes. I mean, this is talking about 14:28:31

4 a specific product that is being developed in this 14:28:32

5 context. 14:28:34

6 But I think in a lot of contexts, 14:28:35

7 that sentiment is accurate, although not all, and 14:28:37

8 there's nuance in all of this. But broadly, yes. 14:28:40

9 Q. Okay. You can put that to one 14:28:44

10 side. We're done with that. 14:28:46

11 Mr. Zuckerberg, Meta has repeatedly 14:28:47

12 denied that increased use of Facebook and Instagram 14:28:52

13 by teens has any correlation with increased harms 14:28:56

14 to their mental health, correct? 14:29:01

15 MR. SCHMIDT: Objection. 14:29:03

16 Foundation. 14:29:04

17 THE WITNESS: I'm not sure 14:29:05

18 what you're referring to there. 14:29:07

19 BY MR. WARREN: 14:29:09

20 Q. Okay. So let me show you another 14:29:09

21 exhibit. We'll mark this for identification as 14:29:13

22 Exhibit 33. 14:29:15

23 (Document marked for 14:29:18

24 identification as (Meta) Zuckerberg

25 Exhibit 33.) 14:29:19

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1 BY MR. WARREN: 14:29:19

2 Q. And I'll represent to you that this 14:29:19

3 was obtained from the Senate Judiciary Committee's 14:29:21

4 website. 14:29:27

5 Do you have any reason to dispute 14:29:27

6 that this is publicly available on the Senate's 14:29:36

7 website? 14:29:39

8 A. No. 14:29:39

9 Q. Okay. And this is a letter from 14:29:40

10 Facebook, dated December 23, 2020, yes? 14:29:42

11 A. It looks like it, yes.

12 Q. Just going off the front page -- 14:29:55

13 I'm sorry. I did not mean to talk over you. Could 14:29:57

14 you answer again? 14:30:00

15 A. It looks like it, yes. 14:30:00

16 Q. Okay. And it indicates that it's 14:30:02

17 responding to questions, for the record, from the 14:30:03

18 Committee on the Judiciary's November 17, 2020, 14:30:06

19 virtual hearing, correct? 14:30:10

20 A. Yes, that's what it looks like. 14:30:11

21 Q. Okay. Can you direct your 14:30:16

22 attention to Page 125. 14:30:18

23 A. Sure. 14:30:21

24 Q. And by the way, I'm happy to 14:30:21

25 represent to you that November 17, 2020, hearing is 14:30:26

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1	one of the clips that we watched earlier today.	14:30:30
2	MR. WARREN: Counsel, will	14:30:34
3	you accept that representation?	14:30:35
4	MR. SCHMIDT: Sure, if	14:30:37
5	you're making that representation. I don't	14:30:38
6	think you need me to, but...	14:30:40
7	BY MR. WARREN:	14:30:43
8	Q. Okay. So Meta was asked the	14:30:43
9	following question, Numbered Question 109:	14:30:49
10	"Is Facebook able to determine	14:30:53
11	whether increased use of its platform among teenage	14:30:56
12	girls has any correlation with increased signs of	14:31:00
13	anxiety within this demographic, through the	14:31:03
14	information collected from its suicide detection	14:31:07
15	algorithm or other technology?"	14:31:09
16	Did I read the question correctly?	14:31:11
17	A. Yes, I think you did.	14:31:13
18	Q. And how did your company respond?	14:31:27
19	A. It looks like we said no.	14:31:30
20	Q. Okay. So let me direct your	14:31:33
21	attention back to Exhibit 6, which is one of the	14:31:35
22	documents that we looked at earlier in the day.	14:31:41
23	THE WITNESS: Will you send	14:31:46
24	that back to me?	14:31:47
25	MR. SCHMIDT: Yeah. We're	14:31:48

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		Page 241
1	getting it for you.	14:31:49
2	THE WITNESS: Okay.	14:31:50
3	Are we done with this?	14:31:53
4	BY MR. WARREN:	14:31:56
5	Q. We are for now. We'll be coming	14:31:56
6	back to it.	14:31:59
7	A. Okay.	
8	Q. Okay. This is the internal	14:32:05
9	document called "Youth Empathy Framing" that we	14:32:06
10	looked at earlier, yes?	14:32:10
11	A. Yes.	14:32:11
12	Q. Can you flip to the second page,	14:32:12
13	please.	14:32:15
14	Do you see the heading titled,	14:32:19
15	"Known Negative Effects of FB and/or Social Media	14:32:21
16	in General on Teens"?	14:32:26
17	A. Yes.	14:32:28
18	Q. The last bullet says, "Increase in	14:32:36
19	anxiety."	14:32:40
20	Did I read that correctly?	14:32:41
21	A. Yes, you read that correctly.	14:32:42
22	Q. Can you turn to the next page. The	14:32:50
23	bottom of this page references the youth empathy	14:32:59
24	team's anticipated work in the second half of 2017	14:33:03
25	and the first half of 2018, correct?	14:33:05

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1 A. Sorry. Can you say that again. 14:33:08

2 Q. The bottom of this page references 14:33:10

3 the youth empathy team's anticipated work in the 14:33:12

4 second half of 2017 and the first half of 2018, 14:33:16

5 correct? 14:33:19

6 A. Let me read it. 14:33:19

7 Q. Let me withdraw the question. 14:33:28

8 There's a heading in the document 14:33:36

9 that says, "Q4 2017 + Q1 2018." 14:33:37

10 Do you see that? 14:33:43

11 A. Yes. 14:33:43

12 Q. All right. So this document was 14:33:44

13 created before the responses that Facebook provided 14:33:44

14 to the Senate Judiciary Committee in December 2020, 14:33:46

15 correct? 14:33:50

16 A. It doesn't have a date on it, but I 14:33:51

17 assume from that, that the answer is yes. But I 14:34:04

18 don't know the exact date. It seems like that's 14:34:08

19 knowable. 14:34:11

20 Q. Okay. Let's go back to the 14:34:12

21 responses to the committee that's in front of you. 14:34:14

22 A. Okay. 14:34:17

23 Q. And that's Exhibit 33. And we'll 14:34:17

24 go back to the same page that we were looking at, 14:34:22

25 which is Page 125. 14:34:25

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1	going to respectfully move to strike	15:07:57
2	everything after the first sentence.	15:08:00
3	MR. SCHMIDT: You can't --	15:08:01
4	you can't interrupt him mid answer.	15:08:01
5	MR. WARREN: I did not	15:08:03
6	interrupt him in mid answer.	15:08:04
7	MR. SCHMIDT: I think you	15:08:05
8	were still speaking. Were you still	15:08:06
9	speaking?	15:08:08
10	THE WITNESS: Yeah, but it's	15:08:08
11	fine.	15:08:09
12	MR. WARREN: Okay.	15:08:10
13	MR. SCHMIDT: I'll state for	15:08:10
14	the record, you're gracious. It's not	15:08:10
15	fine.	
16	Please don't interrupt.	15:08:13
17	MR. WARREN: I didn't.	15:08:13
18	I'm going to move to strike	15:08:14
19	everything after the first sentence which	15:08:14
20	was nonresponsive to my question.	15:08:16
21	MR. SCHMIDT: And we'll	15:08:18
22	oppose that motion.	15:08:19
23	BY MR. WARREN:	15:08:20
24	Q. Mr. Zuckerberg, 3.1 percent of	15:08:21
25	billions of users is a lot of people, wouldn't you	15:08:22

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1 agree? 15:08:25

2 A. Yes. 3 percent of billions of 15:08:26

3 people is a lot of people. 15:08:30

4 Q. Okay. 15:08:32

5 A. It's not -- not the majority, but 15:08:32

6 it's -- obviously, it's millions of people. 15:08:35

7 Q. Yeah. Okay. As a parent yourself, 15:08:38

8 do you think you have a right to know if a product 15:08:46

9 your kid is using is addictive? 15:08:49

10 MR. SCHMIDT: Objection. 15:08:52

11 Foundation. 15:08:52

12 THE WITNESS: I think that 15:08:53

13 there's a lot to sort of unpack in that. 15:08:56

14 I know there's a lot that's 15:08:59

15 just hard to exactly know. So as a parent, 15:09:10

16 I definitely care about the impact of 15:09:14

17 anything that my kids use. And because of 15:09:16

18 that, myself, or my wife, are probably 15:09:19

19 going to look into whether the products 15:09:24

20 that we give our children are good to use. 15:09:26

21 And we also don't just give 15:09:28

22 it to them. We also kind of oversee how 15:09:30

23 they are used. And our kids are younger, 15:09:33

24 et cetera. 15:09:35

25 BY MR. WARREN: 15:09:35

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1 BY MS. CHAN: 16:50:47

2 Q. So, Mr. Zuckerberg, this is an
3 email chain where you write the original e-mail 16:50:48
4 starting at the bottom of the first page, which is 16:50:49
5 dated February 7, 2016, at 2:53 p.m., correct? 16:50:51

6 A. Sorry. You are talking about on 16:50:56
7 the -- 16:51:26

8 Q. The very bottom of the first page 16:51:26
9 of the original first e-mail in this chain, which 16:51:28
10 is from you, on Sunday, February 7, 2016, at 16:51:30
11 2:53 p.m.; is that correct? 16:51:35

12 A. Sorry. What is the question? Was 16:51:37
13 that the e-mail that I wrote? 16:51:41

14 Q. Yes. 16:51:42

15 A. Yes, it looks like it. 16:51:44

16 Q. And you write the first e-mail in 16:51:45
17 the chain. And this is the first e-mail in the 16:51:47
18 chain, correct? 16:51:49

19 A. It looks like it. 16:51:50

20 Q. And this is the way it got produced 16:51:56
21 to us and printed out. But you see your subject 16:51:58
22 line, based on the e-mail above, was "Live 16:52:01
23 lockdown"? 16:52:06

24 A. Yeah, I see that. 16:52:07

25 Q. Okay. And then the e-mails in this 16:52:08

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1 thread were sent in the normal course of your work 16:52:10

2 at Meta? 16:52:14

3 A. I assume so. What -- I'm not sure 16:52:15

4 what that means. 16:52:20

5 Q. Within the scope of your work at 16:52:21

6 Meta? 16:52:23

7 A. Yeah. Yeah. 16:52:23

8 Q. Great. And in the first sentence 16:52:24

9 of the e-mail that you wrote on February 7, 2016, 16:52:26

10 at 2:53, states: "I'm excited about pushing ahead 16:52:29

11 as fast as we can on Live because it is the most 16:52:35

12 unique and promising new development in two spaces 16:52:39

13 we care about deeply but are behind in: video and 16:52:42

14 teens." 16:52:46

15 Did I read that correctly? 16:52:47

16 A. Yes. 16:52:48

17 Q. And "Live" here refers to the 16:52:50

18 product feature that exists on both Instagram and 16:52:51

19 Facebook today that allows users to both stream and 16:52:55

20 watch realtime video content; is that correct? 16:52:58

21 A. I believe so, yes. 16:53:01

22 Q. And you were noting here that the 16:53:04

23 Live product was the most promising way to grow in 16:53:05

24 the space of teen users, which was a space Meta was 16:53:09

25 behind on; is that right? 16:53:12

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1 something like YouTube Kids or a kids version of an 18:52:23
2 app. I don't know if that's sort of the research 18:52:27
3 that we had on that. 18:52:30

4 Q. Because they have kind of similar 18:52:30
5 interests to a 13 and 14-year-old? 18:52:32

6 A. Or maybe they just -- maybe it's 18:52:34
7 just aspirational. Maybe they wanted to be more 18:52:38
8 like the other teens. I'm not sure. I think we 18:52:40
9 need to study that more. 18:52:42

10 But I think that that's -- I think 18:52:43
11 by the time that they are close enough to being 13 18:52:44
12 and being able to use those services, I think they 18:52:46
13 kind of just want to use those services, not just a 18:52:49
14 kid version. 18:52:53

15 Q. We can put that document aside. 18:52:54

16 Mr. Zuckerberg, you are aware, as a 18:52:59
17 general matter, that some users of Instagram and 18:53:00
18 Facebook are under 13, right? 18:53:03

19 A. What do you mean as a general 18:53:05
20 matter? 18:53:07

21 Q. I'm not talking about individual 18:53:08
22 users, but you are aware, generally, that some 18:53:10
23 users of Instagram and Facebook are under 13, 18:53:12
24 right? 18:53:15

25 A. Yeah. I mean, anytime we become 18:53:15

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1 aware that a specific person is using the service 18:53:17
2 under the age of 13, we kick them off the service 18:53:20
3 because we don't allow people under the age of 13 18:53:23
4 to use the services. 18:53:27

5 But I think what you're getting at 18:53:28
6 is that some people under the age of 13 lie and say 18:53:28
7 that they're older in order to use the service. 18:53:33
8 And that's a thing that I think all of these 18:53:35
9 different services sort of struggle to police. 18:53:38

10 Q. Okay. And you've known for some 18:53:38
11 time that some users are -- of Instagram and 18:53:40
12 Facebook are under 13, right? 18:53:43

13 A. I think we're generally aware in 18:53:44
14 the way that you're saying, that there are people 18:53:48
15 who are under the age of 13 who lie about their age 18:53:52
16 in order to get around the controls that different 18:53:55
17 apps have. 18:53:58

18 Q. Okay. I'd like to turn to 18:53:59
19 Document R. 18:54:02

20 (Document marked for 18:54:03
21 identification as (Meta) Zuckerberg
22 Exhibit 65.) 18:54:04

23 BY MS. O'NEILL: 18:54:04

24 Q. And this will be Exhibit 65. And 18:54:10
25 it's Bates-stamped META3047MDL-155-00000602. 18:54:15

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1	(Short break.)	14:55:04
2	THE VIDEOGRAPHER: The time	14:55:04
3	is 2:57 p.m. Pacific Time. We're back on	14:57:32
4	the record.	14:57:35
5	- - -	
6	EXAMINATION	
7	- - -	14:57:36
8	BY MR. WARREN:	14:57:36
9	Q. Good afternoon, Mr. Zuckerberg.	14:57:37
10	I'll direct your attention to	14:57:38
11	Exhibit 89. Do you see the top right-hand corner	14:57:41
12	of that?	14:57:43
13	This indicates that the paper was	14:57:45
14	published as part of something called "CHI	14:57:47
15	Conference on Human Factors in Computing Systems	14:57:51
16	Proceedings" in Glasgow, Scotland.	14:57:54
17	Do you agree with that?	14:57:56
18	A. I'm not actually sure what that	14:57:59
19	refers to. It also says New York.	14:58:08
20	Q. Okay. Do you know how many parents	14:58:10
21	of teens attended the CHI Conference on Human	14:58:13
22	Factors in Computing Systems Proceedings in	14:58:18
23	Glasgow, Scotland?	14:58:21
24	A. I do not.	14:58:22
25	Q. Do you know how many parents of	14:58:22

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1	teens read this paper?	14:58:24
2	A. No, I do not.	14:58:25
3	Q. It's important that the research	14:58:27
4	you publish is accurate, right?	14:58:29
5	A. We definitely try to do accurate	14:58:31
6	research.	14:58:37
7	Q. Right. Because if --	
8	A. It's not very helpful if it's not	14:58:37
9	accurate.	14:58:38
10	Q. Exactly.	14:58:39
11	And if it's not accurate, people	14:58:39
12	could get the wrong idea and misleading impression	14:58:40
13	about the safety of your platforms, correct?	14:58:43
14	A. Well, I think it's important that	14:58:44
15	research is accurate, just in order to be valuable	14:58:46
16	overall. But, you know, science is an ongoing	14:58:50
17	iterative process, so --	14:58:53
18	Q. Mm-hmm. Okay.	14:58:54
19	MR. SCHMIDT: You can't	14:58:55
20	interrupt him.	14:58:56
21	Please finish your answer.	14:58:57
22	BY MR. WARREN:	14:58:58
23	Q. Were you done?	14:58:58
24	A. I'll let you go. We have a short	14:58:59
25	period of time, so I'll let you get through the	14:59:01

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1	things that you want.	14:59:04
2	Q. Thanks. I appreciate that.	14:59:04
3	Let's take a look at Exhibit 39.	14:59:05
4	You were shown this before, yes?	14:59:07
5	This is an e-mail that Mr. Ginsberg sent to you on	14:59:11
6	the second page, correct?	14:59:14
7	A. Yes.	14:59:15
8	Q. Yes. And at the bottom of the	14:59:25
9	e-mail that he sent to you, he said that	14:59:27
10	"Problematic use prevalence was 55 percent mild and	14:59:31
11	3.1 percent severe."	14:59:35
12	Do you see that?	14:59:36
13	A. I see the reference that you're	14:59:36
14	referring to, yes.	14:59:41
15	Q. All right. What's 55 percent plus	14:59:42
16	3.1 percent?	14:59:44
17	A. 58.1, I would assume.	14:59:45
18	Q. 58.1 percent. Right.	14:59:49
19	And this e-mail was sent April 8,	14:59:51
20	2019, correct?	14:59:53
21	A. That's what it says.	14:59:54
22	Q. Okay. Let's go back to Exhibit 89,	14:59:58
23	the paper that we were just looking at.	15:00:02
24	A. Okay.	15:00:04
25	Q. I'll direct your attention to the	15:00:05

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1 second page, which your counsel asked you a 15:00:07
2 question about. 15:00:09

3 And I direct your attention to the 15:00:10
4 top left corner where it says, "We estimate as an 15:00:13
5 upper bound that 3.1 percent of Facebook users in 15:00:18
6 the U.S. experience problematic use." 15:00:22

7 Did I read that correctly? 15:00:23

8 A. I think you read that correctly. 15:00:25

9 Q. Okay. Does it say 58.1 percent? 15:00:30

10 A. No. Although, you know, I mean, 15:00:34
11 just in the interest of time, I'm not going to go 15:00:38
12 through and try to read this whole paper now. So 15:00:41
13 I'm not sure if it references that somewhere else. 15:00:44

14 I mean, Ginsberg is referencing a 15:00:48
15 mild prevalence stat here that I would imagine he 15:00:51
16 got from somewhere and didn't just make up. So I 15:00:55
17 assume that it's from this or other research. 15:00:59

18 MR. WARREN: I move to 15:01:01
19 strike that as nonresponsive, everything 15:01:01
20 after "No." 15:01:04

21 MR. SCHMIDT: Object to the 15:01:05
22 motion to strike. It's not proper. 15:01:06

23 BY MR. WARREN: 15:01:07

24 Q. Does it say 3.1 percent of Facebook 15:01:07
25 uses in the U.S. suffer from severe problematic 15:01:10

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CERTIFICATE

I HEREBY CERTIFY that the witness was duly sworn by me and that the deposition is a true record of the testimony given by the witness.

It was requested before completion of the deposition that the witness, MARK ZUCKERBERG, have the opportunity to read and sign the deposition transcript.

MICHELLE L. RIDGWAY,
Certified Shorthand Reporter,
(CA-CSR # 14592)
(Certified Court Reporter
(NJ-CCR # XI02126)
Registered Professional Reporter,
Certified Realtime Reporter
and Notary Public
Dated: April 1, 2025

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