

AMENDED Exhibit 122

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
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION/PERSONAL)
INJURY PRODUCTS LIABILITY) MDL No. 3047
LITIGATION)
-----)
THIS DOCUMENT RELATES TO:)
ALL ACTIONS)

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

COORDINATION PROCEEDING)
SPECIAL TITLE [RULE 3.400]) Lead Case No.
SOCIAL MEDIA CASES) for Filing
Purposes
-----) 22STCV21355
This Document Relates to:)
STATE OF TENNESSEE,)
Ex rel. JONATHAN SKRMETTI,)
ATTORNEY GENERAL and REPORTER,) Case No.
v.) 23-1364-IV
META PLATFORMS, INC., and)
INSTAGRAM, LLC,)

MONDAY, NOVEMBER 18, 2024

CONFIDENTIAL - ATTORNEYS' EYES ONLY -
PURSUANT TO PROTECTIVE ORDER

- - -

Videotaped deposition of Shruti
Bhutada, held at the offices of Covington &
Burling LLP, 3000 El Camino Real, 10th Floor,
Palo Alto, California, commencing at
9:11 a.m. Pacific Time, on the above date,
before Carrie A. Campbell, Registered
Diplomate Reporter, Certified Realtime
Reporter, Illinois, California & Texas
Certified Shorthand Reporter, Missouri,
Kansas, Louisiana & New Jersey Certified
Court Reporter.

- - -

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1 Q. And as part of your training in
2 moral psychology, did you work -- or did part
3 of your education include the idea of doing
4 different kinds of studies?

5 A. Yes.

6 Q. Okay. Would those include --
7 or why don't you tell me the kinds of studies
8 that you would be involved in doing or
9 learned how to do.

10 A. It would be quite a broad
11 range, but let me try to see if I can
12 summarize.

13 We would definitely be doing
14 experiments, and this would be either field
15 experiments, lab experiments, survey
16 experiments, literature reviews, surveys.
17 I -- it could also include some qualitative
18 methods like interviews and diary studies.

19 Q. And would it include some
20 quantitative methods as well?

21 A. So all of the experiments are
22 quantitative studies. Surveys, they're all
23 quantitative studies, yes.

24 Q. Got it.

25 So as part of your educational

1 background, you learned a broad field of
2 studies, including experimental field, lab
3 surveys or lab studies, literature reviews,
4 qualitative and quantitative studies.

5 Is that correct?

6 A. That is correct.

7 Q. And one of the -- I was
8 interested in reading your CV. One of the
9 studies is it looked like you conducted while
10 you were at the London Business School, it
11 says -- and I think if we look at the Ph.D.
12 researcher...

13 Let's see. What's this?

14 Going on page 2, if we go down
15 it says, "Led research project to study
16 causes of unethical behavior in
17 organizations. Surveyed over 200 employees
18 on Amazon MTurk-proposed prescriptions to
19 reduce unethical behavior."

20 Did I see that -- read that
21 correctly?

22 A. That -- you did read that
23 correctly.

24 Q. Okay. So tell me this. As
25 part of your research in that project to

1 determine the causes of unethical behavior,
2 did you determine that money or economics can
3 be one of the things that is a cause of
4 unethical behavior?

5 MR. IMBROSCIO: Object to form.

6 THE WITNESS: Honestly, I don't
7 remember.

8 QUESTIONS BY MR. GOZA:

9 Q. Okay.

10 A. This was, I believe, ten years
11 ago or so.

12 Q. Uh-huh.

13 A. I would not remember --

14 Q. Okay.

15 A. -- the exact details.

16 Q. Would you agree with me that
17 when companies balance money against risks,
18 that that can be one of the drivers of
19 unethical behavior?

20 MR. MAINLAND: Objection to
21 form.

22 THE WITNESS: Could you
23 rephrase that question?

24 QUESTIONS BY MR. GOZA:

25 Q. Sure.

1 I'm simply asking, can the
2 effort at profits sometimes result in
3 unethical behavior?

4 MR. MAINLAND: Objection.

5 THE WITNESS: Do you want me to
6 comment as a layperson, like my
7 opinion, or --

8 QUESTIONS BY MR. GOZA:

9 Q. I want you to comment as
10 somebody who has spent time developing a
11 Ph.D., doing studies both in the field,
12 experimental studies, and who has worked at
13 various companies, simply if you can answer
14 that question.

15 MR. MAINLAND: I'm going to
16 object to the question as lacking a
17 foundation.

18 THE WITNESS: Honestly, at this
19 point I can only speculate, and that's
20 because a lot of this material is not
21 fresh for me. So...

22 QUESTIONS BY MR. GOZA:

23 Q. Okay. Let's cover your
24 professional background.

25 You started -- after you

1 graduated, it looks like you stayed at the
2 London Business School for a period of time.

3 A. Uh-huh.

4 Q. Is that correct?

5 A. For a year -- for about nine
6 months, yeah.

7 Q. Okay. And then you went on to
8 go to work for Apple.

9 Is that correct?

10 A. That is correct.

11 Q. And what did you do for Apple?

12 A. I was a market research analyst
13 there. Market research.

14 Q. Okay. And when you say "market
15 research," what would that have included?

16 A. If I remember correctly, we did
17 sort of market surveys. So just -- yeah, I
18 believe we were looking at specific stores
19 and just looking at people's experience in
20 those stores.

21 Q. All right. Then you went on to
22 go to work for Meta.

23 True?

24 A. That is correct.

25 Q. Okay. And during the course of

1 this deposition, just to keep things
2 straight, Meta has two platforms: social
3 media -- well, more than that. But we've got
4 Meta is the parent company of both Instagram
5 and Facebook.

6 Is that correct?

7 A. That is correct.

8 Q. Okay. And did you actually go
9 to work for Meta?

10 A. Could you --

11 Q. Was Meta Meta when you came
12 there?

13 A. Oh, it was not called Meta when
14 I came there.

15 Q. Okay. That's what I was
16 getting at.

17 It was called Facebook at that
18 time; is that right?

19 A. That is correct.

20 Q. Okay. And then it became Meta
21 when?

22 A. If I remember, it was towards
23 the end of my time there.

24 Q. Okay. So sometime in 2021.
25 Would you agree with that?

1 A. If I -- if my memory serves me
2 right, yes.

3 Q. Okay. And is it -- so as --
4 for purposes of today, I'm going to refer to
5 Meta as "the company," and if I want to refer
6 to a specific platform, I'll either use the
7 word "Instagram" or "Facebook."

8 All right?

9 A. Okay.

10 Q. Okay. Would you agree that as
11 part of your training in -- educational
12 training that you were trained to interpret
13 and assess the findings and data that you
14 found from your surveys and other field work
15 that you did?

16 A. Yes.

17 Q. And were you trained to assess
18 the reliability of those findings?

19 A. Yes.

20 Q. And I am assuming that you
21 believe that the work that you did at Meta
22 was good, competent research work.

23 True?

24 A. That is true.

25 Q. And you believe that your team

1 had done at Meta?

2 Well, let me strike that. Let
3 me ask this again.

4 A. Okay.

5 Q. Is it fair to say that that
6 theme among teen girls specifically, social
7 comparison and body images, stand -- stood
8 out as things that Instagram made worse?

9 A. I believe in the Hard Life
10 Moments we did flag that I believe one in
11 three teen girls who experience body image
12 issues said that Instagram made it worse,
13 which was a -- which is fairly high up among
14 the things that -- if you rank/order the
15 things that teens would blame us for after
16 having experienced it, I would believe it was
17 either like the top or the second for teen
18 girls, body image issues, yes.

19 (Bhutada Exhibit 21 marked for
20 identification.)

21 QUESTIONS BY MR. GOZA:

22 Q. All right. Let me hand you
23 Exhibit 21, which is the Hard Life Moments -
24 Mental Health Deep Dive --

25 A. Yes.

1 simply, was that consistent with the findings
2 that you made?

3 A. Teen girls are more susceptible
4 compared to adult men?

5 Q. Yes.

6 A. Again, I would imagine yes, but
7 let me see if we have the actual breakdown by
8 gender for that specific group here. It
9 should be -- I know the reach is higher among
10 teens than it is among adults.

11 And hold on. Let me see if we
12 have reach numbers by gender.

13 Q. That's all right. If it's
14 going to take too long --

15 A. Yeah. Yeah.

16 Q. -- I think my point is made
17 here.

18 So let's just look at your
19 slide and go back to 14 again.

20 A. Yeah.

21 Q. What you found was that you
22 made body image issues worse for one in three
23 teen girls.

24 Right?

25 A. We found that one in three teen

1 girls that reported having body image issues
2 said Instagram made it worse.

3 Q. Yeah. Okay. And then -- and
4 on page 26 you said, "Social comparison ranks
5 highest amongst issues Instagram should care
6 about."

7 Did I get that correctly?

8 A. Sorry, it's 26. This slide.

9 Yes, you've read that
10 correctly. Yes.

11 (Bhutada Exhibit 22 marked for
12 identification.)

13 QUESTIONS BY MR. GOZA:

14 Q. Okay. Let me hand you what's
15 been marked as Exhibit 22.

16 MR. IMBROSCIO: Are we done
17 with 21?

18 MS. QUINLAN: Yes.

19 MR. IMBROSCIO: Awesome.

20 QUESTIONS BY MR. GOZA:

21 Q. And this is entitled "Social
22 Comparison Exploratory Research."

23 A. Yes.

24 Q. And again, this is a document
25 that you did with, this time, Wendy Gross?

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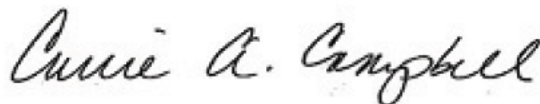
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CERTIFICATE

I, CARRIE A. CAMPBELL, Registered Diplomat Reporter, Certified Realtime Reporter and Certified Shorthand Reporter, do hereby certify that prior to the commencement of the examination, Shruti Bhutada, was duly sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action



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