

AMENDED Exhibit 130

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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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION/)
PERSONAL INJURY PRODUCTS) MDL No. 3047
LIABILITY LITIGATION)

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

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

-----)
This Document Relates To)
STATE OF TENNESSEE, ex rel.)
JONATHAN SKRMETTI,)
ATTORNEY GENERAL and)
REPORTER,)
v.)
META PLATFORMS, INC., and)
INSTAGRAM, LLC.)
-----)

CONFIDENTIAL - ATTORNEYS' EYES ONLY
PURSUANT TO PROTECTIVE ORDER
VOLUME 1

VIDEO-RECORDED
DEPOSITION OF MOIRA BURKE
(Pages 1 - 410)

Covington & Burling
415 Mission Street, San Francisco, California
Tuesday, January 28, 2025, 9:06 a.m.

- - - -
REPORTED BY: ELAINA BULDA-JONES, CSR 11720

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APPEARANCES

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and Mark Elliot Zuckerberg:

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Also present:

Michael Fronzaglia, trial tech
Chris Ritona, videographer
Holly Tambling, Meta
Krista Batchelder
Corin Stigall
Angela Priest
Abby Cunningham
Alyssa Metcalf
Nathan Whelihan
Keaton Murphy
Melissa Roberts
Mandy Wang
Zach Richards
Tom Cartmell
Meera Khan
Verna Pradaxay
Chris Ayers
Kathleen Hudnall
Shaheen Sheikh
Lucy Malone
Previn Warren
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Matthew Cocanougher
Alex Kory
Jon Kieffer
Sophie Assadnia
Steven Kaufmann
Paige Boldt
Tess Shaw
Keaton Murphy
Verna Pradaxay
Jon Kieffer

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1 Q. Would you please tell us your full name.

2 A. I'm Moira Kathleen Ballantyne Burke.

3 Q. Okay. And who do you work for?

4 A. I work for Meta.

5 Q. Okay. And what's your title at Meta?

6 A. I'm a research scientist.

7 Q. I understand that you have a Ph.D.; is
8 that correct?

9 A. Yes.

10 Q. Do you go by Dr. Burke or Ms. Burke?

11 A. Dr. Burke.

12 Q. Okay. Dr. Burke, my name is Jack Hyde and
13 I represent plaintiffs in this case.

14 Do you understand that?

15 A. Yes.

16 Q. Okay. They've sued Meta.

17 Do you understand that?

18 A. Yes.

19 Q. I represent individuals and families of
20 youth who claim they've been harmed by Meta's
21 platforms.

22 Do you understand that?

23 A. Yes.

24 Q. Okay. And I represent school districts
25 across the United States who are suing for harms

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1 caused to the educational process.

2 Do you understand that?

3 A. Yes.

4 Q. And do you understand that you're here
5 today as a witness in this case because you've
6 worked for many years for Meta in areas of work
7 involving youth mental well-being?

8 A. Yes.

9 Q. Have you ever given a deposition before?

10 A. No.

11 Q. Have you ever testified at a trial before?

12 A. No.

13 Q. And you're here today with counsel that
14 represents you; is that correct?

15 A. Yes.

16 Q. Okay. And do you consider the counsel
17 here today to be your lawyers?

18 A. Yes.

19 Q. And do you know who is paying your lawyers
20 today?

21 A. I believe Meta is.

22 Q. How much time did you spend preparing for
23 this deposition?

24 A. Approximately 20 hours.

25 Q. Did you meet with your lawyers to do that?

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1 A. It's summarizing several studies that I
2 think we've already started to talk about.

3 Q. Okay. Let's look at page that ends in
4 1895.

5 The first bullet point on this slide
6 states, "About one out of ten people experience
7 negative social comparison on Instagram often or
8 always."

9 Do you see that?

10 A. That's right. So one out of ten people
11 who answered this study reported these three
12 questions related to negative social comparison
13 often or always.

14 Q. And that was a finding of your study?

15 A. Yes.

16 (Whereupon, a brief discussion off the
17 record.)

18 MS. BARNHART: Object to the form.

19 THE WITNESS: That was one of the findings
20 in this study.

21 BY MR. HYDE:

22 Q. And one in ten Instagram users would be
23 millions of people; is that correct?

24 MS. BARNHART: Object to the form.

25 Foundation.

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1 THE WITNESS: That's my understanding,
2 yes.

3 BY MR. HYDE:

4 Q. And the second bullet point indicates,
5 "About one in four people think that Instagram makes
6 social comparison worse."

7 Do you see that?

8 A. I do. And that's from a different study
9 that I didn't run called the Hard Life Moments
10 survey. And it's about people's perceptions about
11 various hard moments in their lives, including
12 social comparison.

13 Q. Okay. But the statistic of one in four
14 people think that Instagram makes social comparison
15 worse. Is that your understanding of what the data
16 showed?

17 MS. BARNHART: Object to the form.

18 THE WITNESS: That's my understanding of
19 what this study said, yeah.

20 BY MR. HYDE:

21 Q. Let's look at the next page.

22 The first bullet point on this slide
23 states, "Negative social comparison on Instagram is
24 more common in globally western countries." And an
25 example of that would be the U.S.; is that correct?

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1 STATE OF CALIFORNIA)

2 COUNTY OF YOLO)

3 I, ELAINA BULDA-JONES, a Certified Shorthand
4 Reporter of the State of California, duly authorized
5 to administer oaths pursuant to Section 2025 of the
6 California Code of Civil Procedure, do hereby
7 certify that

8 MOIRA BURKE,
9 the witness in the foregoing deposition, was by me
10 duly sworn to testify the truth, the whole truth and
11 nothing but the truth in the within-entitled cause;
12 that said testimony of said witness was reported by
13 me, a disinterested person, and was thereafter
14 transcribed under my direction into typewriting and
15 is a true and correct transcription of said
16 proceedings.

17 I further certify that I am not of counsel or
18 attorney for either or any of the parties in the
19 foregoing deposition and caption named, nor in any
20 way interested in the outcome of the cause named in
21 said deposition dated the _____ day of
22 _____, 2025.

23 
24

25 ELAINA BULDA-JONES, CSR 11720