

AMENDED Exhibit 168

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 ARTURO BEJAR
(Pages 1 - 351)

Held at Baker Botts
1001 Page Mill Road, Palo Alto, California
Monday, April 7, 2025, 9:20 a.m.

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

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1 A. No.

2 Q. And is anybody compensating you to be here
3 to testify?

4 A. No.

5 Q. I want to talk about your background at
6 Meta and your work in some detail, but first I want
7 to ask you some specific questions.

8 First, do you have expertise in the area
9 of social media user safety?

10 A. I do, yes.

11 Q. And how many years have you worked in that
12 area?

13 A. I mean, I think if we go from today, it
14 would go back to 1994. So that would be, like,
15 30 years, give or take.

16 Q. Would that area that would -- strike that.
17 Would that area include the safety of kids
18 on social media?

19 A. Yes, it would.

20 Q. And how did -- strike that.

21 Did you work at Meta in the area of online
22 safety and security?

23 A. Yes, I did.

24 Q. Including online safety and security of
25 kids?

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1 A. Yes.

2 Q. Did your work at Meta include assessing
3 whether Meta was adequately protecting and
4 preventing harms to kids on Meta's social media
5 apps?

6 A. Yes.

7 Q. And did your work include making
8 recommendations to Meta's senior leadership about
9 how to protect kids and prevent harms on Meta's
10 social media apps?

11 A. Yes, I did.

12 Q. How long did you work on social media
13 safety and security at Meta?

14 A. My first stint there was six years, and
15 then I came back and I worked on that for another
16 three years.

17 Q. So eight years total?

18 A. Eight years total, yeah.

19 Q. Are you prepared today to talk about your
20 work in safety and security at Meta?

21 A. I am, yes.

22 Q. Are you also prepared today to discuss
23 your assessment as to whether Meta's Instagram
24 platform is safe for kids?

25 A. I am, yes.

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1 Q. Right up front I want to ask you, based on
2 your 30 years of experience as a user safety and
3 security expert, including your eight years of work
4 at Meta, what is your assessment as to whether Meta
5 adequately protects kids on its social media app
6 Instagram?

7 A. Meta does not adequately protect kids on
8 Instagram. And I believe that's true today.

9 Q. Now, while you were working at Meta as its
10 online safety expert, did you take those concerns
11 for the safety of kids of Meta's Instagram --
12 related to Meta's Instagram app all the way to the
13 highest level of the company?

14 A. I did, yes.

15 Q. All the way to the highest executives of
16 the company?

17 A. Yes. I took them to Mark Zuckerberg and
18 Sheryl Sandberg and Adam Mosseri and people who lead
19 the company.

20 Q. Did you tell Mr. Zuckerberg that you
21 thought Meta did not adequately understand the harms
22 that Instagram users, including kids, were
23 experiencing?

24 A. Yes, I did.

25 Q. What did you tell Mr. Zuckerberg as far as

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1 Q. Okay. What about hate? Hate is
2 25 percent, seen any hate speech or threats that you
3 feel don't belong on Instagram.

4 Do you see that?

5 A. Yeah, I see that.

6 Q. And is that one out of every four people
7 said they had seen that?

8 A. That's correct.

9 Q. Explain nudity, please.

10 A. So the question is, have you seen any
11 nudity or sexual content that you feel doesn't
12 belong on Instagram? And 23 percent, approximately
13 one in four people, said yes in the last seven days.

14 Q. What about violence?

15 A. Have you seen any violent content that you
16 feel doesn't belong on Instagram? And then you get
17 one in five people said yes in the last seven days.

18 Q. Child safety is 19 percent. And is the
19 question asked, seen anything on Instagram that made
20 you worried that a child was unsafe?

21 A. That's correct.

22 Q. So almost one in five people said they had
23 seen that in the last week?

24 A. That's correct.

25 Q. Eating disorders is 18 percent. Seen

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1 anyone on Instagram who was promoting eating
2 disorders or unhealthy weight loss; is that correct?

3 A. That is correct.

4 Q. So almost one in five there, too, right?

5 A. That is correct.

6 Q. What is solicitation?

7 A. Seeing anybody on Instagram trying
8 to sell -- buy or sell sexual activity or services.

9 Q. That's 17 percent?

10 A. That's correct.

11 Q. What is NCII? Is that nonconsensual
12 inappropriate interactions?

13 A. That's correct.

14 Q. What was the question there?

15 A. Have you seen any nudity or sexual content
16 on Instagram that you were worried was shared
17 without the person's permission?

18 Q. Is that -- I may be wrong, but is that
19 something that happens with sextortion?

20 A. It happens on sextortion and it happens on
21 revenge porn.

22 Q. SSI, what does that mean?

23 A. Have you seen anyone on Instagram who you
24 were worried might hurt themselves or commit
25 suicide?

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1 MS. JONES: Excuse me.

2 Objection to the form. And foundation.

3 THE WITNESS: I was not aware of any team
4 working on addiction in 2019.

5 BY MR. CARTMELL:

6 Q. And did you at any time while you were
7 there from '19 to '21 see that Instagram or Meta had
8 actually published any internal research on
9 addiction or problematic use?

10 A. I did not.

11 Q. What about warning the public of the
12 increased risk to kids of addiction or problematic
13 use from Instagram, did they ever warn the public,
14 kids, or parents of that?

15 A. They did not.

16 Q. Do you believe, based on your expertise as
17 a child safety expert, that Instagram did enough to
18 actually try to prevent or substantially reduce
19 addiction or problematic use to kids on Instagram?

20 MS. JONES: Objection to the form.
21 Foundation.

22 THE WITNESS: They did not.

23 (Whereupon, Meta-Bejar Exhibit 10 was
24 marked for identification.)

25 (Whereupon, a brief discussion off the

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1 And to this day, today, when a teenager gets an
2 unwanted nude, what do they do? I keep testing this
3 regularly in the hope that there is going to be
4 something, which is the first step.

5 Q. Okay. So -- and did you discover, when
6 you were looking, whether or not actually kids were
7 using the reporting flow and they had a meaningful
8 amount of kids reporting harms?

9 MS. JONES: Objection. Foundation. Form.

10 THE WITNESS: When we looked at the
11 reporting tools that they provide, one of the things
12 that we found is of the people who have had -- who
13 told us they had a bad experience, only 1 percent of
14 them finished submitting feedback through the
15 reporting tool. Like, one in a hundred people
16 actually used the tool all the way through.

17 I believe, based on prior experience and
18 the way this is assigned, that that number for
19 teenagers is likely much lower.

20 And then, like, how can you prevent harm
21 if you're not letting people tell you when it's
22 happening.

23 BY MR. CARTMELL:

24 Q. Is one of the things that you did when you
25 were at Meta from 2019 to 2021 as their safety

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1 BY MR. CARTMELL:

2 Q. You mentioned that there were no metrics
3 in place; is that right?

4 MS. JONES: Objection to form.

5 BY MR. CARTMELL:

6 Q. Strike that.

7 You mentioned that one of the steps to
8 have an appropriate safety framework is that there
9 needs to be metrics in place for safety, correct?

10 A. Correct.

11 Q. Do you believe that Instagram had
12 appropriate metrics in place for safety?

13 A. They did not.

14 Q. Do they today? Do you know?

15 A. I don't know.

16 Q. Real quick, I want to ask you about when
17 you went back in 2019, did you actually also look at
18 the Facebook reporting flow?

19 A. Yes, I did.

20 Q. And did you actually also find that the
21 Facebook reporting flow was flawed?

22 A. Yes, I did.

23 Q. What did you find?

24 A. So I found that they had brought back a
25 lot of the changes that we had done, which led to

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1 more accurate reports and reducing the number of
2 reports that needed to be reviewed. And so I spoke
3 to the -- both the product manager and the
4 engineering manager for their team at Facebook that
5 was responsible for the reporting tools.

6 Q. And what did you find out?

7 A. I found out that, in the words of the
8 engineering manager -- well, I'm not going to -- let
9 me tell you what I found out and -- and as a result
10 of the conversations I had with all of them.

11 So this is not one person, but it was,
12 like, multiple people said this. The manager for
13 the team, the product manager, and the engineering
14 manager.

15 And what I learned from talking to them
16 was that they had had some difficulty maintaining
17 some of the older flows that were based on previous
18 infrastructure. So they removed the flows, at which
19 point reporting went up significantly, and they did
20 not have enough people to review.

21 So they adjusted the flow to add something
22 called friction, which is add steps that make people
23 drop off, so they don't complete the task, and that
24 they had always added a blue button that people
25 clicked in the knowledge that they believe they had

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1 submitted a report when the blue button dismissed
2 the flow.

3 And this was something that everybody that
4 I spoke to within that part of the company was aware
5 of. And I found that very problematic.

6 Q. Was Meta actually making design changes to
7 the Facebook reporting flow to discourage reporting?

8 MS. JONES: Objection. Foundation.

9 THE WITNESS: That is correct.

10 BY MR. CARTMELL:

11 Q. And did Meta actually intentionally
12 include what you called a blue button to try to
13 lower the amount of reporting?

14 MS. JONES: Same objection.

15 THE WITNESS: That is correct.

16 BY MR. CARTMELL:

17 Q. Let me ask you. Your reaction to that,
18 you said it was problematic.

19 Did that tell you anything about Meta's
20 commitment to safety?

21 MS. JONES: Objection to the form.

22 THE WITNESS: Yes, it did.

23 BY MR. CARTMELL:

24 Q. What did it tell you?

25 A. Not a priority. It's more important to

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1 reduce the number of reports that you get than it is
2 to make a better product that helps people tell you
3 what the harm is and then do the work of going and
4 reducing that harm.

5 Q. You mentioned that you also did an
6 assessment of the safety tools and features on
7 Instagram during your stint during 2019 to '21; is
8 that right?

9 A. That's right.

10 Q. When you did an assessment of Instagram's
11 safety tools and features, did you find that there
12 were any that were effective at preventing or
13 substantially reducing harms to kids on Instagram?

14 A. I believe that at the time there were no
15 tools that were effective at reducing the harm that
16 kids were experiencing on Instagram.

17 Q. I have seen that you described Instagram's
18 safety tools and features as placebo; is that right?

19 A. I have, yes.

20 Q. What does that mean?

21 A. It means that they are tools that sound
22 good but that don't effectively -- or reduce
23 real-world harm. And so they -- I think that they,
24 like, sound really good in the press and sound good
25 for regulators or people trying to pass legislation,

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1 feasible. And then as new technologies entered, it
2 would have gotten so much more effective than it
3 originally was.

4 BY MR. CARTMELL:

5 Q. I want to switch gears a little bit, but
6 still talking about number four.

7 Is actually age verification a part of an
8 appropriate safety framework?

9 A. Yes, it is.

10 Q. In other words, do you believe Instagram
11 should have had appropriate age verification in
12 place to keep kids safe on Instagram?

13 A. Yes, I do.

14 Q. Let's talk about your first stint at Meta
15 when you were working on the Facebook app and they
16 purchased Instagram. Okay?

17 A. Yes.

18 Q. In 2012 they purchased Instagram, correct?

19 A. Correct.

20 Q. And then between 2012 and 2015 was the
21 period of time that you were at Meta and working
22 some in conjunction with Instagram's leaders; is
23 that correct?

24 A. That is correct.

25 Q. At that time in 2012 to 2015, on Instagram

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1 what was the required minimum age for a kid to have
2 an account?

3 A. At the time, on Instagram, there was a
4 "don't ask, don't tell" policy.

5 Q. Okay. Was there a written --

6 MS. JONES: Let me just object to that
7 answer as nonresponsive to the question.

8 Go ahead.

9 THE WITNESS: Okay.

10 BY MR. CARTMELL:

11 Q. I'll restate the question.

12 In 2012, from that time until you left in
13 2015, at Meta, was there a written policy related to
14 the minimum required age for kids on Instagram?

15 A. There was not.

16 Q. Was the required age that people discussed
17 13? In other words, was there a terms of service or
18 something that stated that you had to be -- a kid
19 had to be 13 to be on Instagram?

20 A. No.

21 MS. JONES: Objection to the form.

22 BY MR. CARTMELL:

23 Q. What was your understanding while you were
24 at Meta from 2012 to 2015 about Instagram's age
25 verification policy?

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1 afraid to hit it because of that. And then they are
2 worried they are going to get somebody else in
3 trouble.

4 So we knew that the word report did not
5 work for teens to select that as an option. And in
6 2011 or '12 we changed that word to be something
7 else that teens would feel comfortable clicking so
8 we could get the information about the things that
9 they were having.

10 MS. JONES: Let me just object again to
11 the narrative nonresponsive answer. And just to be
12 very clear, we're going to seek to strike all of
13 these answers as being speeches. They are not
14 responsive to your questions.

15 Go ahead.

16 MR. CARTMELL: Well, I'm just going to
17 respond to that one because I think it calls for a
18 response.

19 Okay. We will move on.

20 Q. Was eating disorder content and body image
21 content something that Meta knew was frequent on
22 Instagram?

23 MS. JONES: Objection. Foundation.

24 THE WITNESS: Yes.

25 ///

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1 BY MR. CARTMELL:

2 Q. And did Meta know from its internal
3 research that there was content that was frequent on
4 Instagram that was promoting or encouraging body
5 image issues and eating disorders?

6 MS. JONES: Objection to the form and
7 lacks foundation.

8 THE WITNESS: Yes.

9 BY MR. CARTMELL:

10 Q. Were you using this example to show the
11 Instagram Well-Being leads that this type of content
12 was frequent on Instagram and not violating the
13 community standards?

14 A. Yes.

15 Q. Was that because you were telling the
16 Instagram leads -- strike that.

17 Did you do that because you were telling
18 the Instagram leads that there was harm to girls and
19 kids on Instagram from this type of content?

20 A. Yes.

21 Q. Did Instagram ever, that you know of, warn
22 parents or the public that it knew there was content
23 that was frequent on Instagram that was promoting or
24 causing or contributing to cause eating disorders
25 and body image issues? Do you know?

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1 about one in five within a week that had
2 experienced. And we looked at the question, right,
3 related to that. Do you recall what the question
4 is?

5 A. Yeah. In the last seven days, did you see
6 nudity or unwanted sexual content on Instagram.

7 Q. Okay. "Unwanted advances."

8 Let's pull up the actual questions, Jim,
9 if you don't mind. It's dot 5. Okay.

10 So for "Unwanted advances," the question
11 was, it's up there on the right, in the questions,
12 "Have you ever received unwanted sexual advances on
13 Instagram?"

14 What was the actual response rate for that
15 for the teenagers?

16 A. So for 13- to 15-year-olds, 13 percent,
17 one in eight said yes in the last seven days.

18 [REDACTED]
19 [REDACTED]

20 [REDACTED]

21 Q. One in eight within the last seven days
22 and some had multiple; is that right?

23 A. That is correct.

24 Q. Did that concern you?

25 A. Absolutely.

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1 them.

2 Is that true?

3 A. That's correct.

4 Q. For nudity, it was 87.1 percent of the
5 people who -- I guess that's who produced that
6 nudity, they didn't know them; is that right?

7 A. That's correct.

8 Q. Unwanted sexual advances, it was
9 93.8 percent of the people who were making these
10 unwanted sexual advances, the respondent didn't know
11 that person.

12 Do you see that?

13 A. That's correct.

14 Q. What is the significance of these things
15 to you?

16 A. It means that they are experiencing these
17 issues from strangers and interactions facilitated
18 by the product design of Instagram.

19 Q. It's the design -- strike that.

20 Is it the design of the actual platform
21 that facilitates that?

22 MS. JONES: Objection. Form. Foundation.

23 THE WITNESS: That is correct.

24 BY MR. CARTMELL:

25 Q. Explain that, please, if you can.

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1 BY MR. CARTMELL:

2 Q. Do you know whether or not the company
3 destroyed the BEEF emotions data because the company
4 was under scrutiny related to Frances Haugen's leak
5 of research to the public?

6 MS. JONES: Objection. Foundation.

7 THE WITNESS: I don't know that.

8 BY MR. CARTMELL:

9 Q. Let me wrap this up. But if Meta asked
10 Kyle Andrews to delete the emotions data from the
11 BEEF survey, what, if anything, does that tell you
12 about the safety as a priority for Meta?

13 MS. JONES: Objection. Foundation.
14 Mischaracterizes the evidence.

15 Go ahead.

16 THE WITNESS: That safety is not a
17 priority, that the harm that teens are experiencing
18 and how bad it is is something to be hidden or
19 removed, that things that parents and everybody
20 should know about the reality of a harming place on
21 Instagram, that that is something that Meta doesn't
22 want people to know.

23 BY MR. CARTMELL:

24 Q. Were any of the BEEF survey findings made
25 public by Meta?

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1 A. They were not.

2 Q. Do you believe Meta should have made the
3 BEEF survey findings available to the public?

4 A. Absolutely.

5 Q. Including parents?

6 A. Parents need to know. Yes, including
7 parents. Absolutely. So important. I cannot
8 stress this enough. How do you know what goes on
9 when you hand your kid the phone and you help them
10 install the app. How are you going to know what
11 they are going to experience without this data. You
12 are blindfolded as a parent.

13 Q. You talked earlier today about the
14 importance of transparency; is that correct?

15 A. That is correct.

16 Q. Can sharing research like these BEEF
17 results and findings be -- and being transparent
18 with the public and parents help reduce harm to kids
19 on Instagram?

20 A. Yes, it's absolutely essential.

21 Q. Do you believe that Meta's lack of
22 transparency by failing to inform the public of its
23 research, like BEEF, has contributed to harms to
24 kids on Instagram?

25 MS. JONES: Objection. Foundation.

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1 THE WITNESS: Yes, absolutely.

2 BY MR. CARTMELL:

3 Q. Can publishing data like this from the
4 BEEF findings actually serve as a warning to kids
5 and parents and the public that Instagram can lead
6 to harmful experiences?

7 MS. JONES: Objection. Foundation.

8 THE WITNESS: Yes, it can. It helps you
9 have an informed conversation with your kids about
10 the things that they might be experiencing when they
11 go online, and that's the least you can do as a
12 parent.

13 BY MR. CARTMELL:

14 Q. Meta does have a website that it has where
15 it publishes -- strike that.

16 Meta does have a website where it
17 publishes what it calls safety data, correct?

18 A. That's correct.

19 Q. It's called the Transparency Center,
20 correct?

21 A. That's correct.

22 Q. Could Meta put this BEEF data and their
23 internal research related to harms to kids on the
24 Transparency website?

25 A. They could and they should.

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1 algorithms so that you do not recommend this to a
2 teenager on any surface.

3 MS. JONES: Excuse me, Counsel.

4 I'm going to object to the nonresponsive
5 narrative answer.

6 BY MR. CARTMELL:

7 Q. This time period is in September of 2021,
8 right?

9 A. That is correct.

10 Q. Do you think Meta should have taken those
11 measures you just stated much earlier than that?

12 A. Absolutely.

13 Q. You think that Meta should have told
14 parents and the public about the risk of harm from
15 self -- suicide and self-injury content on
16 Instagram?

17 A. Absolutely.

18 Q. They should have warned about that; do you
19 believe?

20 A. Absolutely.

21 Q. Was it well-known among the well-being
22 team at Meta and others that suicide and self-injury
23 and self-harm content was easily accessed on
24 Instagram by kids?

25 MS. JONES: Objection. Foundation.

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1 THE WITNESS: Yes, it was.

2 MR. CARTMELL: Why don't we break for
3 tonight if it's okay for you.

4 THE VIDEOGRAPHER: Time is 6:43. We're
5 off the record.

6 (Whereupon, the deposition was adjourned
7 at 6:43 p.m.)
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1 want to ask you about a few things.

2 But tell me, what was the general topic of
3 Mr. Zuckerberg's post?

4 A. I mean, there's a sentence says, We care
5 deeply about issues like safety, well-being, and
6 mental health. And that was just not my experience
7 of the previous two years.

8 Q. In the first full paragraph, it says
9 (as read):

10 "At the heart of these accusations is
11 the idea we prioritize profit over safety
12 and well-being. That's just not true."
13 Do you see that?

14 A. I do.

15 Q. Based on your experience at Meta, as Meta's
16 well -- excuse me. Strike that.

17 Based on your experience at Meta from 2019
18 to 2021, as Meta's online safety consultant, was
19 that your experience, what Mr. Zuckerberg said?

20 A. My experience was that they prioritize
21 engagement and growth over safety and well-being.

22 Q. And you've provided to us in your testimony
23 lots of examples of that; is that true?

24 A. Correct.

25 Q. He says in this second paragraph, as you

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1 for -- for good.

2 Q. Could you ever convince the leadership at
3 Meta to do something like that for kids?

4 A. I could not.

5 Q. And that type of intervention or a
6 playbook, as you described, safety tools and safe --
7 let me restate it.

8 Those types of safety tools and features
9 that you say Meta could have implemented, when was
10 that available and feasible for a company like Meta
11 to do that?

12 MS. JONES: Objection. Foundation and
13 form.

14 THE WITNESS: 2010.

15 BY MR. CARTMELL:

16 Q. At this time, in 2021, we're talking about
17 when the BEEF results come back and addiction is not
18 being monitored, has Meta warned the public,
19 including kids or their parents, that there is an
20 increased risk of addiction or problematic use from
21 the use of Instagram?

22 A. It had not.

23 Q. Okay. You can put BEEF aside. I want to
24 switch gears, and I want to ask you now, after you
25 got the BEEF results and your team did, the

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1 the platform was not a priority.

2 Q. As someone who's worked in the area of
3 online safety for many years, do you think it would
4 have been prudent for Meta to build parental
5 supervision tools much, much earlier than 2022?

6 MS. JONES: Objection to the form.
7 Foundation.

8 THE WITNESS: Absolutely. I think that at
9 the moment that Instagram had all of these sort of
10 features that allowed contact and content and it was
11 made available to young people, that that is the
12 moment at which they should have started developing
13 and continued to develop tools that meaningfully
14 supported parents and kids in the partnership of
15 being safe online.

16 BY MR. PHELPS:

17 Q. Based on this press release, is it your
18 understanding that the parental tools that the
19 company launched in 2022 was an opt-in feature?

20 A. Yes.

21 Q. Based on this press release, is it your
22 understanding that the parental supervision tools
23 the company launched in 2022 was something you had
24 to navigate into the settings to activate?

25 MS. JONES: Objection to the form.

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1 THE WITNESS: Yes.

2 BY MR. PHELPS:

3 Q. What impact would those features of
4 parental supervision have for adoption and
5 effectiveness based on your industry experience?

6 MS. JONES: Objection. Foundation. Calls
7 for speculation.

8 THE WITNESS: It would mean that the
9 feature would not be adopted and then as such would
10 not be effective as a safety feature.

11 BY MR. PHELPS:

12 Q. Do you know whether the company had teams
13 measuring the effectiveness of these parental
14 supervision tools in 2022?

15 A. I did not have visibility on that.

16 Q. If you were trying to assess the
17 effectiveness of this tool, would you want to know
18 if there were teams measuring and improving the tool
19 within the company?

20 A. Absolutely.

21 Q. And that -- that's, yet again, the concept
22 that a press release and launching a tool is really
23 just the first step into ensuring its success?

24 MS. JONES: Objection to the form.

25 THE WITNESS: Correct. There has to be a

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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 ARTURO BEJAR,
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