

AMENDED Exhibit 194

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:23-cv-01804-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)

This Document Relates to:) Lead Case No.
22STCV21355)

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 MICHAEL "MIKI" ROTHSCILD
(Pages 1 - 370)

Held at the Law Offices of Covington & Burling
3000 El Camino Real, Palo Alto, California
Tuesday, January 21, 2025, 9:06 a.m.

REPORTED BY: ELAINA BULDA-JONES, CSR 11720

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APPEARANCES

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For the Defendants Meta Platforms, Inc., f/k/a
Facebook, Inc.; Facebook Holdings, LLC; Facebook
Operations, LLC; Facebook Payments, Inc.; Facebook
Technologies, LLC; Instagram, LLC; Siculus, Inc.;
and Mark Elliot Zuckerberg:

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15 Also present:

16 Rita Bosworth, Meta
17 Taylor Smith, Meta
18 Donnie Guillory, trial tech
19 Evan Wolfe, trial tech
20 Alejandro Zamora Ruiz, videographer
21 Jared Rinehimer
22 Laurel Lackey
23 Charles White
24 Aelish Baig
25 Verna Pradaxay
Alex Kory
Maureen Murphy
Lucy Malone
Asma Jaber
Jack Barry
Abby Cunningham
Mandy Wang
Kirk Goza
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Christina Chan
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Jon Kieffer
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1 Robert Groves
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3 Clinton Richardson
Matthew Janssen
4 Brian Reiser
Elizabeth Orem
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6 Joseph VanZandt
Alexandra Walsh
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1 including Meta, based on their claims that they've
2 been harmed by Meta's social media platforms like
3 Instagram and Facebook.

4 Do you understand that?

5 A. Yes.

6 Q. Okay. And I represent kids and young
7 adults and families of young adults who are claiming
8 they were -- strike that.

9 And I represent school districts across
10 America who are suing social media companies,
11 including Meta, for causing harms to their
12 operation, including disruption to the educational
13 process.

14 Do you understand that?

15 MR. HALPERIN: Object to foundation.

16 THE WITNESS: I understand you represent
17 the multiple lawsuits.

18 BY MR. CARTMELL:

19 Q. Do you understand that you're here as a
20 witness in this case because you have worked at Meta
21 over the years, and specifically, you've worked in
22 the areas related to work on child safety and harms
23 to kids?

24 A. I have worked quite a few years in this
25 space of protecting kids, protecting teens on our

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1 services here at Meta.

2 Q. And you were also for a period of time I
3 think senior product manager at Instagram and
4 helping Instagram to grow specifically with respect
5 to teens, correct?

6 A. I've been working both at Instagram and
7 more recently across different teams across the
8 company, including in the safety and well-being
9 space for teens.

10 Q. Am I right that you are currently still
11 working for Meta?

12 A. Yes, I still work at Meta.

13 Q. And I believe that you have worked for
14 Meta for approximately 11 years; is that right?

15 A. Almost 11 years, that's right.

16 Q. Before we get started asking questions
17 about your work at Meta, I want to ask you a few
18 things about this process.

19 Have you ever given a deposition before?

20 A. I have given one deposition in an
21 intellectual property case.

22 Q. Were you a witness testifying on behalf of
23 Meta?

24 A. That is correct.

25 Q. And when was that deposition?

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1 constantly.

2 Q. Now, that research that Thorn did that
3 identified those millions of 9- to 12-year-olds on
4 Instagram and Facebook, that was in 2021, so Meta
5 had already been asking for the ages of kids for a
6 period of time, correct?

7 MR. HALPERIN: Misstates the document.

8 THE WITNESS: Again, I -- as I said, I'm
9 not exactly sure what this research is, but we did
10 already collect age from users, that's correct.

11 BY MR. CARTMELL:

12 Q. Okay. And we saw a document previously
13 that showed that Meta knew there was approximately a
14 60 percent lying rate for kids, correct?

15 MR. HALPERIN: Misstates testimony.

16 THE WITNESS: Again, this was teens lying,
17 representing their age as adults. So this is 13- to
18 17-year-old who provide stated age of over 18 and we
19 use predicted age in order to identify those --
20 those users and give them protections.

21 BY MR. CARTMELL:

22 Q. Okay. So as of 2021, Meta knew that
23 approximately 60 percent of teens were lying on
24 Instagram and saying they were adults, fair?

25 A. Based on our estimates. So we had

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1 estimates based on predicted age. So that was our
2 approximation.

3 Q. So did Meta even think it was possible
4 that maybe kids 9 to 12 might also lie and say they
5 were older to get on Instagram? Did you even
6 consider that?

7 MR. HALPERIN: Objection.

8 THE WITNESS: We --

9 MR. HALPERIN: Form.
10 Give me a second.

11 Form. Argumentative. Foundation.

12 THE WITNESS: So we work to collect age
13 and continuously developed, you know, age
14 verification, other methods to prevent age
15 misrepresentation.

16 BY MR. CARTMELL:

17 Q. I'm going to hand you what's been marked
18 as Exhibit 7 and 8.

19 (Whereupon, Meta-Rothschild Exhibit 7 was
20 marked for identification.)

21 (Whereupon, Meta-Rothschild Exhibit 8 was
22 marked for identification.)

23 BY MR. CARTMELL:

24 Q. And I will say that the first e-mail, I'm
25 just going to ask you if it includes the link to

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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 MICHAEL "MIKI" ROTHCHILD,
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