

AMENDED Exhibit 21

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.)
-----)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
PURSUANT TO PROTECTIVE ORDER
VIDEO-RECORDED
DEPOSITION OF ROBERT CHEN
(Pages 1 - 313)

Covington & Burling
3000 El Camino Real, Palo Alto, California
Tuesday, March 25, 2025, 9:24 a.m.

- - - -

REPORTED BY: ELAINA BULDA-JONES, CSR 11720

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APPEARANCES

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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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1 document to be?

2 A. It looks like my LinkedIn profile.

3 Q. Okay. And when you say this looks like
4 your LinkedIn profile, you created the LinkedIn
5 profile, correct?

6 A. Yes.

7 Q. Okay. And you posted this profile online
8 on linkedin.com, correct?

9 A. Yes.

10 Q. And this is a true and accurate copy of
11 the material that you posted online, correct?

12 A. Yes.

13 Q. Thank you.

14 Mr. Chen, does this accurately reflect
15 your educational background and current work
16 experience to date?

17 A. Yes.

18 Q. Okay. Let's just start a little bit on
19 your educational background.

20 A. Uh-huh.

21 Q. What is your educational background?

22 A. I got a BA in molecular and cellular
23 biology and political science at UC Berkeley.

24 Q. Okay. And when did you obtain that
25 degree, what year?

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1 A. I graduated in 2008.

2 (Reporter clarification.)

3 BY MR. DOWNING:

4 Q. Do you have any other educational degrees?

5 A. No other degrees.

6 Q. Okay.

7 A. High school diploma, but I'm assuming
8 you're...

9 Q. Yes, I was after -- after graduating from
10 UC Berkeley.

11 A. Yeah.

12 Q. Let's then look at your employment
13 history.

14 I'm going to start from your -- after
15 graduating college.

16 A. Okay.

17 Q. After graduating from UC Berkeley, did you
18 take a job somewhere?

19 A. Yes.

20 Q. Okay. Where did you begin working?

21 A. At Accenture.

22 Q. Okay. And I see here on the second page
23 of your LinkedIn profile it says "Accenture,
24 Business Strategy Manager."

25 Is that your -- was that your title?

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1 A. Yes.

2 Q. Okay. And it says September 2008 to
3 October 2015.

4 Is that the length of time that you were
5 at Accenture?

6 A. Yes.

7 Q. Okay. And under that, this describes your
8 work at Accenture as including "Advised technology
9 clients in the SF Bay Area with an emphasis on new
10 product development, business development, and
11 marketing."

12 Did I read that correctly?

13 A. Yes.

14 Q. Is that an accurate description of your
15 work experience at Accenture?

16 A. I also did a little bit of work in
17 healthcare.

18 Q. Okay.

19 A. But -- yeah.

20 Q. So this is -- but your answer is this is
21 accurate here?

22 A. This is accurate here, yeah.

23 Q. But then you're also saying in addition
24 you did healthcare work as well; is that correct?

25 A. That's correct.

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1 Q. All right. Let's turn to the front page,
2 page 1 of 2.

3 A. Uh-huh.

4 Q. Do you see at the bottom, it says
5 "Facebook Product Strategist"?

6 A. Yes.

7 Q. Okay. It says October 2015 to
8 September 2019.

9 Do you see that?

10 A. Yes.

11 Q. Okay. So this indicates that you joined
12 Facebook as a product strategist; is that right?

13 A. The role as it was then called was market
14 strategist. Later on the team changed its name.

15 Q. Okay. And this says October '15 to
16 September '19. That's the time period that you had
17 this role as a product strategist; is that correct?

18 A. Yes.

19 Q. Okay. All right.

20 And can you tell me what team or teams you
21 were on during the time that you were a product
22 strategist?

23 A. Yeah. So we eventually consolidated into
24 a central team. And that central team was then
25 known as market strategy and then product strategy.

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1 And I would work with a variety of product teams at
2 Meta.

3 In terms of the teams that I worked with,
4 I worked on Facebook groups. I worked on what was
5 initially known as the teens team. And then it
6 changed to the youth team.

7 I worked on just, like, Facebook, the app
8 more generally.

9 And I also did work that connected with a
10 variety -- various, like, messaging aspects of the
11 product. So that would include Facebook Messenger,
12 Instagram Direct, and WhatsApp.

13 Q. Okay. Who did you report to during the
14 time period that you had the title of product
15 strategist?

16 A. I had, per usual at Meta, many managers.

17 My first manager was [REDACTED]. My
18 second manager was [REDACTED]. And I think my
19 third manager was [REDACTED].

20 Q. Okay.

21 A. And my fourth manager was [REDACTED].
22 And my fifth manager was [REDACTED].

23 Q. Were these managers that you had at
24 different times or did they overlap as managers for
25 you?

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1 A. Different times. I have one manager at a
2 time.

3 Q. Okay. And as the product strategist role,
4 did you supervise anyone?

5 A. I did not.

6 Q. Okay. All right.

7 Let me ask you about on page 2 of 2, the
8 top, the first, I guess paragraph there.

9 A. Uh-huh.

10 Q. You say, "Product strategy for
11 Facebook Inc.'s family of apps, including WhatsApp,
12 Instagram, Messenger, and the main Facebook App.
13 Worked with C-suite and heads of family of apps."

14 Did I read that correctly?

15 A. Yes.

16 Q. Okay. When you say "worked with C-suite
17 and heads of family apps," what do you mean?

18 A. So I mean I would be in meetings with a
19 variety of company leadership. Usually, the
20 interactions would be I would present to them my
21 findings. And in some instances there would be
22 working sessions where we would be developing a work
23 product.

24 Q. When I read "C-suite," I think of like a
25 CEO, CFO, or CTO.

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1 Can you be a little bit more specific on
2 who or what titles in the C-suite you're referring
3 to here?

4 A. Yes. CFO.

5 Q. Okay.

6 A. And CPO.

7 Q. Okay. So CFO would be the chief financial
8 officer?

9 A. Yes.

10 Q. Okay. And CPO is the chief product
11 officer?

12 A. Yes.

13 Q. So you're saying that some of your work
14 involved you presenting to the CFO or the CPO; is
15 that right?

16 A. Yes.

17 Oh. I also presented to the COO.

18 Q. Okay.

19 A. Once.

20 Q. Chief operating officer?

21 A. Yes.

22 Q. Okay. Did you ever have an opportunity to
23 present to the CEO?

24 A. No.

25 Q. Okay. So you never presented to Mark

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1 Zuckerberg directly?

2 A. No.

3 Q. And when you say "heads of family apps,"
4 who fits within that umbrella?

5 A. It would be the people who led WhatsApp,
6 Instagram, Messenger, or the main Facebook app.

7 Q. Okay.

8 A. And so at the time -- for a time WhatsApp
9 was led by Chris Daniels. Messenger was led by Stan
10 Chudnovsky.

11 And then Facebook was led by probably
12 Chris Cox. And then Will Cathcart.

13 (Reporter clarification.)

14 THE WITNESS: And then Fidji Simo.

15 BY MR. DOWNING:

16 Q. And you mentioned Instagram in here as
17 well. Did you --

18 A. I did not present to Kevin Systrom.

19 Q. I'm sorry. You said you did not present
20 to Kevin Systrom?

21 A. No.

22 Q. Okay. Let's move down to, I guess, the
23 next bullet. I'll read that here. It says [as
24 read]:

25 Developed the overall strategy and

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1 corresponding measurement framework for the Facebook
2 app in collaboration with the head of Facebook and
3 the small cross-functional team.

4 Did I read that correctly?

5 A. Yes.

6 Q. Okay. When you say "in collaboration with
7 the head of Facebook," who are you talking about
8 there?

9 A. Will Cathcart.

10 Q. Okay. And when you refer to the overall
11 strategy and corresponding measurement framework for
12 the Facebook app, what project or what title does
13 that involve?

14 A. The work was connected with our -- what we
15 then called our -- social services strategy. So the
16 idea here was that Facebook had a -- like a core of
17 assets, such as the people that use it, the brand,
18 and whatnot, that could be used to help develop new
19 products, such as Facebook Dating, for example.

20 And then the measurement framework was a
21 framework that I helped develop to help us
22 understand kind of like the give-and-take between
23 Facebook and any new services or existing services
24 that we had for Facebook.

25 Q. Did the measurement framework have a name

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1 internally?

2 A. I think it was just called measurement
3 framework.

4 Q. Okay. Okay. Let's go down to -- this is
5 another bullet. This is the third bullet. I'll
6 read it here. It says [as read]:

7 Led strategy sprint for product team;
8 strategy adopted and materials were presented to
9 Facebook's board of directors.

10 Did I read that correctly?

11 A. Yes.

12 Q. So this talks about leading a strategy
13 sprint for the product team.

14 What was the strategy sprint related to?

15 A. It was related to teens.

16 Q. Okay. Can you explain a little bit more
17 what -- when you say it's related to teens, in what
18 way?

19 A. So the main participants of the sprints
20 were the market strategy team, subsequently known as
21 product strategy. And we, as a team, did a series
22 of analyses on teens and their app usage and how we
23 as Facebook would want to help improve our product
24 to increase the number of teens on Facebook.

25 Q. And this -- this refers to a strategy

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1 sprint.

2 What does sprint mean in this context?

3 A. Oh, yeah. A sprint means a group of
4 people working together for a short period of time
5 on a particular topic.

6 Q. Okay. And why was there a strategy sprint
7 related to this teen work?

8 A. There was a decline in the number of
9 monthly active teens on the Facebook app. So that
10 was a concern. And given that concern, it was
11 important to develop a stronger understanding of
12 what might be going on in that space. And so that's
13 why we brought in a bunch of people together to
14 increase the focus on it.

15 Q. Okay. And this goes on to say that the
16 strategy was adopted.

17 Adopted in what sense?

18 A. Adopted in the sense of -- I forget the
19 exact contents of the strategy. I think the main
20 thing that was adopted was we stood up a teens
21 product team to work on the teen space to build
22 product for teens.

23 Q. Okay. And the reason to build the product
24 was to stop the teen decline and get more teen users
25 on the Facebook app; is that right?

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1 MR. EPPICH: Object to the form.

2 THE WITNESS: My understanding was that
3 the teens team was formed to bring teens back to
4 Facebook.

5 BY MR. DOWNING:

6 Q. Okay. And then I think this is going to
7 be my last question on this bullet, but you talk
8 about the materials were presented to Facebook's
9 board of directors.

10 Were you involved personally in presenting
11 the material to the Facebook board of directors?

12 A. No.

13 Q. Okay.

14 A. I helped put together the materials, but I
15 did not present on it.

16 Q. So when you say you helped put together
17 the materials, what materials did you help put
18 together?

19 A. Slides, like PowerPoint slides.

20 Q. And based on your understanding, those
21 PowerPoint slides were then presented to Facebook's
22 board of directors; is that right?

23 A. That's my understanding.

24 Q. Okay. Do you know who did the
25 presentation to Facebook's board of directors?

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1 A. I believe it was [REDACTED].

2 Q. Okay. And was [REDACTED] on this team
3 that you were working on?

4 A. He was a lead product manager for the
5 teens team.

6 Q. Okay. And do you know if the board did
7 anything in response to receiving the presentation?

8 MR. EPPICH: Object to the form.
9 Foundation.

10 THE WITNESS: I do not.

11 BY MR. DOWNING:

12 Q. Okay. Let me ask you -- going back to
13 page 1 of your LinkedIn profile, you show a
14 different role, and I'll read it. It says: Meta
15 product lead, September 2019 to present.

16 Is this a new role or -- I should say --
17 strike that.

18 Is this a change in your role at Meta?

19 A. Yes. I switched from product strategist
20 to product management.

21 Q. Okay. And did you switch in September of
22 2019?

23 A. Yes.

24 Q. Okay. And are you presently in that role?

25 A. Yes.

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1 Q. Okay. And who is your supervisor
2 presently?

3 A. [REDACTED].

4 Q. And do you supervise anyone presently in
5 your role as product lead?

6 A. No.

7 Q. And let me ask you, above the Meta product
8 lead there's -- it also says: Instagram product
9 lead, April 2024 to present.

10 Do you see that?

11 A. Yes.

12 Q. Do you also have a title within Instagram
13 somehow?

14 A. I'm indicating that I currently work on
15 Instagram products.

16 Q. Okay. What product do you currently work
17 on at Instagram?

18 A. Instagram's website, instagram.com.

19 Q. Okay. Can you be more specific, like what
20 part of instagram.com do you work on?

21 A. I focus primarily on the logged-out
22 experience of instagram.com. So if you go to -- if
23 you type in instagram.com on your phone or your
24 computer, and you're not logged in to your Instagram
25 account, that's the experience that I am focused on.

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1 video record.

2 (Whereupon, a brief recess was taken.)

3 THE VIDEOGRAPHER: 12:42. We're on the
4 video record.

5 BY MR. DOWNING:

6 Q. All right. Good afternoon Mr. Chen,
7 welcome back.

8 We are going to jump into another set of
9 documents here. I have a document which will be
10 marked Exhibit 5 for you to review.

11 (Whereupon, Meta-Chen Exhibit 5 was marked
12 for identification.)

13 THE WITNESS: Thank you.

14 MR. DOWNING: For the record I will read
15 in the Bates number, which is
16 META3047MDL-027-00000106.

17 Q. Mr. Chen, if you review it generally, then
18 we will go through more specifically some portions
19 of it, so...

20 Go ahead and do that if you would.

21 A. Okay.

22 Q. Okay. Mr. Chen, this document is
23 Exhibit 5. At the top, you will see a Bates 0102,
24 the first page, it says "MK & Youth Platform
25 Products Reviews."

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1 Do you see that?

2 A. Uh-huh.

3 Q. Below that it says [as read]:

4 Closed group. 129 members. Summaries of
5 the MK Leads Reviews with SL dot, dot, dot.

6 Do you see that?

7 A. Uh-huh.

8 Q. This was a Workplace group at Meta, right?

9 A. Yes.

10 Q. Okay. And you are one of the members of
11 this 129-member MK and youth platform product review
12 group, right?

13 MR. EPPICH: Object to the form.

14 THE WITNESS: I assume I was a member.

15 BY MR. DOWNING:

16 Q. Okay. And you assume you were a member
17 because of what?

18 A. There's a post from me.

19 Q. Okay.

20 A. Yeah.

21 Q. And that's what I was going to get into.

22 Below that, do you see your name and a
23 circle with your picture in it?

24 A. Yes.

25 Q. Okay. That is your picture, correct?

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1 A. Yes.

2 Q. Okay. And it says "Robert Chen (PM) is
3 with [REDACTED]."

4 Do you see that?

5 A. Yes.

6 Q. It says August 18, 2018, correct?

7 A. Yes.

8 Q. Okay.

9 A. August 10.

10 Q. Oh, sorry, sorry. Let me read it again.
11 August 10, 2018.

12 Thank you for correcting me.

13 A. Uh-huh.

14 Q. Okay. This is a post that you made on
15 August 10, 2018, to this Workplace group, correct?

16 A. Yeah.

17 Q. Okay. Okay.

18 Beneath your name and the date is the
19 title Market Landscape Review - August 9th (fka)
20 Competitive Landscape Review.

21 Correct?

22 A. Yes.

23 Q. FKA means formerly known as?

24 A. I believe so, yes.

25 Q. And under that you say, "We discussed

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1 Instagram," what did you mean?

2 A. So I don't remember the specific post.
3 But looking at it now, I think in the context of
4 this post, the long-term retention work was done for
5 Facebook but we hadn't done it for Instagram and so
6 I'm suggesting we could look into the same thing for
7 Instagram.

8 Q. Okay.

9 A. Long-term retention for Instagram.

10 Q. Okay. All right.

11 And then there's a heading for Lifetime
12 Value here, right?

13 Do you see that?

14 A. Yes.

15 Q. Okay. And there are three bullets below
16 that, correct?

17 A. Uh-huh.

18 Q. Okay.

19 A. Three top level bullets, yeah.

20 Q. Three -- sorry. You're right.
21 Three top level bullets.

22 A. Uh-huh.

23 Q. The first bullet says "LTV work plugs in
24 retention figures from the retention work above."

25 Did I read that correctly?

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1 A. Yes.

2 Q. Okay. So you're talking again about how
3 long-term retention feeds into lifetime value,
4 right?

5 A. Yeah.

6 Q. Okay. The second bullet says [as read]:
7 Because the difference in retention for
8 people who join as teens is so much greater than
9 those who joined later in life, preliminary results
10 suggest that lifetime value for people who joined
11 Facebook as teens is significantly higher.

12 Did I read that correctly?

13 A. Yes.

14 Q. Okay. And then you propose "Next steps."
15 There are two here that you propose, right?

16 A. Yeah.

17 Q. You propose to refine the model, correct?

18 A. Yes.

19 Q. And by refine the model you mean refine
20 the model that does the lifetime value calculation?

21 A. Yes.

22 Q. Okay. And then you also propose next
23 steps to connect with finance to validate, right?

24 A. Yes.

25 Q. Okay. What would it mean to validate with

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1 BY MR. DOWNING:

2 Q. I can re-ask this question.

3 When you say \$270 per teen, is that 270 in
4 profit or in revenue?

5 A. It's definitely not profit. For the
6 lifetime value calculations, I had used average
7 revenue per user.

8 Q. Okay. So you are saying because you had
9 used average revenue per user, this \$270 figure is a
10 form of revenue?

11 MR. EPPICH: Object to the form. Vague.

12 THE WITNESS: It is like a transformation
13 of the revenue, because the ARPU is the component of
14 the model along with retention and the weighted
15 average cost of capital.

16 BY MR. DOWNING:

17 Q. Okay.

18 A. So it's connected to revenue, yeah.

19 MR. DOWNING: All right. Let's continue
20 on to a new document here. This will be Exhibit 9,
21 Tab 16.

22 (Whereupon, Meta-Chen Exhibit 9 was marked
23 for identification.)

24 BY MR. DOWNING:

25 Q. Here you go. Mr. Chen, I have handed you

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1 Exhibit 9, which has the Bates number
2 META3047MDL-014-00289025.

3 A. Okay.

4 Q. Okay. Mr. Chen, the first page shows an
5 e-mail from [REDACTED].

6 Do you see that?

7 A. Yes.

8 Q. You had mentioned him earlier.
9 He was one of your supervisors; is that
10 right?

11 A. Yes, he was one of my managers.

12 Q. Okay. Was he your manager in -- in
13 October 2018?

14 A. I'm not a hundred percent sure, but I
15 think so.

16 Q. Okay. So [REDACTED] sent an e-mail here
17 to a group that is entitled
18 market_strategy_updates@FB.com.

19 Do you see that?

20 A. Yes.

21 Q. Do you know if you were part of that
22 group?

23 A. I don't know for sure, but I would
24 expect -- I would think so.

25 Q. Okay. And the subject of this e-mail is

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1 Market Strategy Updates - 10/5/18.

2 Do you see that?

3 A. Yeah.

4 Q. So this was the market strategy update for
5 October 5, 2018, right?

6 A. Yes.

7 Q. Okay. Let me direct your attention to one
8 of the particular sections, Section 2, which is on
9 0 -- I'm sorry -- 9027.

10 Do you see where it says: 2 Ecosystems -
11 U.S. User Lifetime Value Phase 1?

12 A. Yes.

13 Q. Okay. If you look at the next page, 9028,
14 up above Assumptions there is a bullet that says:
15 POC Robert Chen.

16 Do you see that?

17 A. Yes.

18 Q. Okay. That means that you were the point
19 of contact; is that right?

20 A. Yes.

21 Q. Okay. So were you the point of contact on
22 this particular bullet, right, or this particular
23 section?

24 A. Yes.

25 Q. Okay. And that's because you had done a

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1 significant amount of work on lifetime value, right?

2 A. That's right.

3 Q. Okay. Let's just flip back to 9025, the
4 first page.

5 A. Okay.

6 Q. There are Highlights here.

7 Do you see 1 through 5 Highlights?

8 A. Yes.

9 Q. Okay. Highlight 2 says: Ecosystems - US
10 User Lifetime Value Phase 1.

11 Do you see that?

12 A. Uh-huh.

13 Q. Can you read the text that follows U.S.
14 User Lifetime Value Phase 1, that paragraph?

15 A. [As read]:

16 Based on a conservative set of
17 assumptions, we find the lifetime value, LTV, of
18 users in the United States to be between \$200 and
19 \$350. People who join FB as 13-year-olds have an
20 LTV of approximately 350, higher than all other teen
21 ages 13 to 18, due to their very high long-term
22 retention. We should acquire teens as young as
23 possible. Phase 2 of the work will explore how the
24 assumptions may change.

25 Q. Okay. Thank you. So in this highlight

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1 here, it says that people who join Facebook as
2 13-year-olds have a lifetime value of approximately
3 \$350, right?

4 A. Yes.

5 Q. So previously, your September 7th e-mail
6 had said \$270, right?

7 A. I forget exactly.

8 Q. Okay.

9 A. Sorry.

10 Q. Here, do you want to look back at --

11 A. Sure.

12 Q. This would be Exhibit 8.

13 A. Uh-huh.

14 Q. Which would be the second page of the
15 e-mail under "Progress."

16 A. Yes.

17 Q. Okay. So what I'm trying to understand is
18 that the calculation had now yielded a slightly
19 higher lifetime value for 13-year-olds, right?

20 MR. EPPICH: Object to the form.

21 THE WITNESS: It looks like it's higher in
22 this October e-mail.

23 BY MR. DOWNING:

24 Q. Okay. And by higher, it's -- in this
25 October 13th e-mail, it's \$350 for lifetime value of

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1 a 13-year-old, right?

2 MR. EPPICH: Object to the form.

3 THE WITNESS: That's -- yeah, that's what
4 the e-mail says.

5 BY MR. DOWNING:

6 Q. Okay. Mr. Chen, were you involved in the
7 updating of these figures that went from 270 to 350?

8 A. I --

9 MR. EPPICH: Object to the form.

10 THE WITNESS: I was the main person on the
11 team working on this. So I wouldn't have a reason
12 to think that it was somebody else.

13 BY MR. DOWNING:

14 Q. Okay.

15 A. Yeah.

16 Q. All right. Let's -- let's go to the
17 actual details that start on Bates 9027.

18 Mr. Chen, do you know -- did you help
19 actually draft this portion of the e-mail that talks
20 about US User Lifetime Value, Phase 1?

21 A. Most likely.

22 Q. Okay.

23 A. But I don't remember. It's been a while.

24 Q. Okay. All right.

25 Under "Context," I want to ask a couple

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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 ROBERT CHEN,
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