

AMENDED Exhibit 22

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

MDL No.: 4:22-md-3047-YGR

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS 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 for Filing
Purposes
22STCV21355

This Document Relates to:

STATE OF TENNESSEE, ex rel.
JONATHAN SKRMETTI, ATTORNEY
GENERAL and REPORTER,
v.
META PLATFORMS, INC., and
INSTAGRAM, LLC,

Case No. 23-1364-IV

DEPOSITION OF KENZIE SNYDER
Volume 1

Taken on Behalf of the Plaintiffs

DATE TAKEN: Thursday, February 27, 2025

TIME: 9:08 a.m. - 6:20 p.m. EST

PLACE: Delta Hotels by Marriott
1301 Belvedere Road
West Palm Beach, Florida 33405

Examination of the witness stenographically reported by:
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1 to use throughout the deposition so we have a clear
2 record and you have an understanding what I mean by
3 certain words and terms.

4 So when you started working at Meta, it was
5 called Facebook; is that correct?

6 A. Correct.

7 Q. And it changed its name to Meta in late
8 2021?

9 A. Yes, I believe so.

10 Q. Okay. Yeah. I'll represent to you that
11 it --

12 A. Okay.

13 Q. -- did change its name to Meta Platforms in
14 late 2021. And so that we don't get confused, I'll
15 be referring to the parent company as Meta --

16 A. Okay.

17 Q. -- even when we're talking about the
18 pre-2021 time frame, and when I use the word
19 "Facebook," I'll be referring to the social media
20 app Facebook.

21 A. I understand.

22 Q. Great. And if it ever becomes unclear, just
23 let me know and I'm happy to try to clarify.

24 A. Okay. Thank you.

25 Q. And then also the same for Instagram. In

1 general, I'll use the word "Instagram" or "IG" to
2 refer to the social media app Instagram. Is that
3 clear?

4 A. I understand.

5 Q. And then I may use the words "teens,
6 adolescents, kids, young users, young people,
7 minors," but by using any of those terms, I'll be
8 referring to individuals ages 13 to 17 unless I say
9 otherwise. Is that clear?

10 A. Okay.

11 Q. So, Dr. Snyder, I'd like to ask you some
12 questions about your education and employment.

13 A. Okay.

14 MS. CHAN: Can we please mark CC1?

15 (Meta - Snyder Exhibit 1 was marked for
16 identification.)

17 MS. CHAN: Excuse me, CC1 and CC2.

18 MS. KARPENKO: Yeah.

19 (Meta - Snyder Exhibit 2 was marked for
20 identification.)

21 BY MS. CHAN:

22 Q. So, Dr. Snyder, I'm showing you what's been
23 marked Exhibit 1 and Exhibit 2. I'll represent to
24 you that these are printouts of your LinkedIn
25 profile that were printed on February 1st, 2025,

1 and Exhibit 1 is a printout of your full profile
2 page and Exhibit 2 is a printout of just the
3 experience section of your LinkedIn profile but
4 fully expanded so that we can see all the text.

5 A. Okay.

6 Q. Can you please review and let me know if
7 that's a fair and accurate representation of your
8 LinkedIn profile page?

9 A. Yes.

10 Q. Great. And did you author the contents of
11 your LinkedIn profile?

12 A. Yes.

13 Q. Does the LinkedIn profile you authored
14 accurately reflect your educational background and
15 work experience?

16 A. Yes.

17 Q. Okay. Let's quickly go through both. You
18 currently work at Meta; is that correct?

19 A. That's correct.

20 Q. And you have been Lead UX Researcher at
21 Instagram from June 2019 to present, correct?

22 A. Currently I am on Threads, which is now
23 independent from Instagram in terms of our
24 organizational structure. I just haven't updated my
25 LinkedIn yet, but --

1 Q. Okay.

2 A. -- for the last year and about -- almost two
3 years now, I've been supporting the Threads app,
4 research for the Threads app.

5 Q. So approximately starting when did you
6 transition to Threads?

7 A. Starting in July of '23.

8 Q. Got it. So you are currently doing two
9 jobs?

10 A. I'm currently working for Threads. I just
11 haven't ended on my LinkedIn that --

12 Q. I see.

13 A. Okay.

14 Q. So the Instagram Lead UX Researcher should
15 say the dates from June 2019 to July 2023?

16 A. That's correct.

17 Q. Got it. And at Threads currently, since
18 July 2023, you're Senior UX Research Lead; is that
19 correct?

20 A. That's correct.

21 Q. And is UX user experience?

22 A. That's correct.

23 Q. And then so prior -- prior to your current
24 job as Threads UX Research Lead, you were a Lead UX
25 Researcher at Instagram; that's correct?

1 A. That is correct.

2 Q. And then prior to that, you were a UX
3 researcher at Facebook for approximately two years,
4 from May 2017 to June 2019, correct?

5 A. That is correct.

6 Q. And May 2017 is when you first got hired by
7 Meta; is that correct?

8 A. That is correct. I was hired earlier
9 that -- I started May 2017 but I was in a car
10 accident and had to delay my start.

11 Q. Okay. And would you say that it was
12 difficult to get hired by Meta?

13 A. The interview process is obviously very
14 rigorous. I -- it was a very natural fit for me
15 given my interest in relationships, social
16 psychology.

17 There were, you know, people in similar
18 programs that I was acquainted with through Columbia
19 that were beginning to work with Meta and chatted
20 with them and it just -- it was a very easy, natural
21 fit.

22 Q. Would you say that they demand a fairly high
23 level of qualification to hold a Senior UX
24 Researcher role?

25 A. Absolutely.

1 Q. And you met those standards because you
2 obviously got hired, correct?

3 A. Yes. At the time I was hired as a
4 university grad but, obviously, with my tenure
5 there, I've continued to grow.

6 Q. And as you just mentioned, before working at
7 Meta you received your Ph.D. from Columbia
8 University in social psychology; is that correct?

9 A. That is correct.

10 Q. And can you describe what it means to get a
11 Ph.D. in the field of social psychology?

12 A. A Ph.D. in social psychology, it requires
13 the defending of a thesis, and it normally is about
14 a five-year program. You acquire a master's after
15 your second year, which also involves a master's
16 talk, master's presentation, and then that work
17 continues till your dissertation defense.

18 Q. And specifically can you describe the field
19 of social psychology? What does that mean?

20 A. It's -- can mean -- it's broad encompassing.
21 My particular focus within social psychology looked
22 at social support and relationships. I looked to
23 understand both romantic couples and how they can
24 best support each other, but also parents and
25 adolescents during the college application process.

1 Q. And does it cover the concept of how human
2 behavior affects mental well-being?

3 A. No, my personal research did not.

4 Q. Okay. Did you gain familiarity with that in
5 terms of levels through your basic training course
6 work throughout the Ph.D. program?

7 MS. BARNHART: Object to the form; asked and
8 answered.

9 A. No, that was -- that was not my focus.

10 Q. Okay. Even though it wasn't your focus,
11 though, I assume there is some base level training,
12 though. Is that not --

13 A. I mean --

14 Q. Is that not correct?

15 A. -- in high school you get --

16 Q. Okay.

17 A. -- kind of basic psych 101, and that was
18 really the extent of mine as well.

19 Q. Got it. And did your social psychology
20 training include understanding the psychology of
21 teens?

22 MS. BARNHART: Object to the form.

23 A. I did not focus on teens. I -- my work that
24 did touch on the college application process, it was
25 more focused on the parent and how they can best

1 support their adolescent.

2 Q. Okay. Was there a base level of training on
3 just the concept of psychology based on age?

4 MS. BARNHART: Object to the form.

5 Q. Sorry, let me clarify. I.e., is there
6 different psychol -- adolescent developmental
7 concepts that apply to adolescents as opposed to
8 adults, did you gain any familiarity with that?

9 A. I personally did not gain familiarity
10 because that wasn't my focus, but you are correct in
11 that there is different developments for
12 adolescents.

13 Q. Got it. And through your Ph.D. training did
14 you gain expertise on understanding self-control and
15 self-regulation and how that might have an impact on
16 well-being?

17 MS. BARNHART: Object to the form.

18 A. I -- the work I did around self-control, it
19 was not in regards to well-being.

20 Q. Could you describe what it was in regards
21 to?

22 A. It was related to how we understood support
23 and in terms of when to offer support versus when to
24 let your partner handle the stressor on their own,
25 and so it was understanding it in that context.

1 Q. Okay. And have you utilized your background
2 and training in social psychology while in your job
3 at Meta?

4 A. The skills that I was taught in terms of
5 research methodology and how to conduct rigorous
6 research, of course, applies.

7 Q. But were there any specific psychology
8 concepts that have been relevant to your work at
9 Meta?

10 A. More of from a methodological standpoint.

11 Q. Sorry. So you're referring to kind of
12 research design and --

13 A. Correct.

14 Q. Got it. Okay. And so looking at Exhibit 2,
15 it says while you were a Ph.D. student at
16 Columbia -- so if you look at the section where you
17 describe your Ph.D., the first bullet says that you
18 developed and designed an original research program
19 exploring the intersection between social support
20 and self-regulation that includes both intensive
21 longitudinal and in-lab experimental design across
22 five unique studies.

23 Is that correct?

24 A. That is correct.

25 Q. And so then as you just referred to, you

1 A. Yeah, which is standard. Every time -- you
2 know, we don't want to -- you know, we wanted to
3 leverage what others have learned before us to be
4 able to design the highest quality research study.

5 Q. Do you know how long [REDACTED] had been
6 working on notifications as part of Facebook?

7 A. I don't.

8 MS. CHAN: Can we mark CC19? Thank you.

9 (Meta - Snyder Exhibit 18 was marked for
10 identification.)

11 BY MS. CHAN:

12 Q. Dr. Snyder, I'm showing you what's been
13 marked as Exhibit 18. Is that correct? Okay.

14 A. I'm just going to take a second to --

15 Q. Sure.

16 Sorry. And for the record, this is a
17 document that begins with Bates Number
18 METAMAAG-001-00021749.

19 A. Okay.

20 Q. Okay. Thank you. Dr. Snyder, this is a
21 doc -- research note entitled "The Role of the Teen
22 in Shaping a Household's Experience of Instagram"
23 that you authored, and it shows the last edit date
24 is January 20, 2021. Is that correct?

25 A. That's correct.

1 Q. And you generated this research note during
2 the course of your work -- normal course of your
3 work at Instagram, correct?

4 A. I generated this note using the insights
5 that [REDACTED] produced from the household study
6 as one of the many, many different types of projects
7 I was currently working on.

8 Q. Okay. And under Executive summary it says:
9 Context: The Household Ecosystem Study was a
10 multimethod approach to understand how the use of
11 social media products, like Instagram, impacts a
12 household. We looked across teen and preteen
13 siblings and their parents/guardians and discovered
14 yet another reason why teens matter for Instagram:
15 Teens shape the household's perception of Instagram.

16 And so what were the already acknowledged
17 reasons of why teens matter for Instagram?

18 MS. BARNHART: Object to the form.

19 A. The one that comes to mind for me is more
20 just in the sense of within the family of apps,
21 Instagram was -- is the teen app, while Facebook
22 tends to be coined as the one for older adults.

23 Q. And why is that?

24 MS. BARNHART: Object to the form; asked and
25 answered.

1 A. That's -- as I had shared earlier, I
2 don't -- I don't know. It's been that way since I
3 joined the company. I'm not sure.

4 Q. But fair to say that teens -- a reason why
5 teens matter for Instagram, and you're saying it's
6 because teens are the primary users of the Instagram
7 app, is because they want to cater to their core
8 base; is that fair?

9 A. I'm --

10 MS. BARNHART: Object to the form;
11 foundation.

12 A. I wouldn't say that. What I'm saying is
13 that when leadership will describe the Meta
14 portfolio of apps, the family of apps, as we call
15 it, just historically, Instagram has been, you know,
16 more for the teen audience and Facebook more for the
17 old people audience, if I can describe it.

18 Q. Okay. And so you're saying you discovered
19 yet another reason why teens matter for Instagram,
20 and then under that, you say Insight Number 1 for
21 this is that "Teens were often the reason that other
22 household members joined Instagram."

23 Did I read that correctly?

24 A. I'm saying that teens, because they're the
25 ones that are typically on Instagram, they're the

1 ones that other members of the household learn about
2 Instagram through.

3 Q. Okay. And so then the implication, as you
4 note in the bullet below, is that teens have the
5 power to influence acquisition and retention for
6 others; is that correct?

7 A. As I said, that teens are often the ones
8 that other members of the household learn about not
9 only Instagram, but social media in general through.

10 Q. And therefore, you're noting here that an
11 implication is that they have the power to influence
12 acquisition and retention for others.

13 Did I read what you wrote correctly?

14 A. Yeah, but as I -- it's not necessarily
15 limited to, like, a particular social media app.
16 Just this is more like a general -- that the role of
17 teens in the family as the ones that are typically
18 the users of social media, they're the ones that
19 other members learn about social media through.

20 Q. As the title of this research notes, this is
21 your study of the household's experience of
22 Instagram, correct?

23 A. That's what the title says but the overall
24 research, as we had talked about, does not focus
25 just on Instagram. It's social media in general.

1 Q. Did it not specifically recruit participants
2 who were users of Instagram?

3 MS. BARNHART: Object to the form.

4 A. The teen was a user of Instagram. The
5 younger sibling and the parent did not need to be.

6 Q. Okay. But you're noting that there was
7 potentially the power for teens to influence
8 acquisition and retention for others on social media
9 apps, including Instagram?

10 A. I didn't -- I don't -- I didn't write
11 "including Instagram." Again, it's --

12 Q. Okay. Then the default would be because the
13 title above it is that teens were often the reason
14 other household members joined Instagram, that it
15 applied to only Instagram, then?

16 MS. BARNHART: Object to the form.

17 A. It matters -- they could influence
18 acquisition on any app, one of which, yes,
19 potentially Instagram.

20 Q. Okay. If you turn to the next page, under
21 "Setting the stage" heading it says: Historically,
22 teens have been a key focus for IG. Acquiring and
23 maintaining them continues to be a priority,
24 reflected by investment in new features like Reels.

25 How did investment in new features like

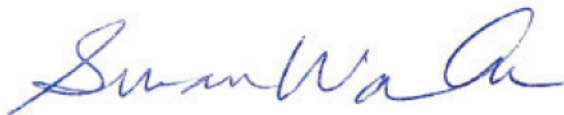
C E R T I F I C A T E

I, Susan D. Wasilewski, Registered Professional Reporter, Certified Realtime Reporter, Certified Manager of Reporting Services, Certified Realtime Captioner, and Florida Professional Reporter, hereby certify that the witness named herein appeared before me on Friday, February 28, 2025, and was duly sworn.

I FURTHER CERTIFY that I was authorized to and did stenographically report the examination of the witness named herein; that a review of the transcript was requested; and that the foregoing transcript is a true record of my stenographic notes.

I FURTHER CERTIFY that I am not related to or an employee of any of the parties, nor am I related to or an employee of any of the parties' attorneys or counsel connected with this action, nor am I financially interested in the outcome of this action.

WITNESS my hand this 18th of March, 2025.



Susan D. Wasilewski, RPR, CRR, CMRS, CRC, FPR