

AMENDED Exhibit 23

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

Frances Haugen

1

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA

3 IN RE: SOCIAL MEDIA ADOLESCENT) MDL No. 3047
4 ADDICTION/PERSONAL INJURY)
5 PRODUCTS LIABILITY LITIGATION)
6) Case No.
7) 4:22-md-3047-YGR
8 This Document Relates to:)
9)
10 ALL CASES)
11)
12)

13 -----
14 CAPTIONS CONTINUE ON FOLLOWING PAGES
15 -----
16

17 Thursday, September 25, 2025

18 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
19
20
21

22 Video-Recorded Oral Deposition of
23 FRANCES HAUGEN, held at the offices of
24 McConnell Valdés LLC, 270 Av. Luis Muñoz
25 Rivera, 7th Floor, San Juan, Puerto Rico,
commencing at 9:10 a.m. AST on the above
date, before Michael E. Miller, Fellow of the
Academy of Professional Reporters, Certified
Court Reporter, Registered Diplomate
Reporter, and Notary Public.

26 GOLKOW - VERITEXT
27 877.370.DEPS | fax 917.591.5672
28 deps@golkow.com

Frances Haugen

2

IN THE CHANCERY COURT OF
DAVIDSON COUNTY, TENNESSEE
TWENTIETH JUDICIAL DISTRICT AT NASHVILLE

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

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

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

IN THE CIRCUIT COURT OF POLK COUNTY, ARKANSAS
CIVIL DIVISION

STATE OF ARKANSAS, ex rel.)
TIM GRIFFIN, ATTORNEY GENERAL)
)
Plaintiff,)
)
v.) Case No.
) 57CV-23-47
META PLATFORMS, INC.; et al.)
)
Defendants.)

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

SUPERIOR COURT
BUSINESS LITIGATION SESSION

COMMONWEALTH OF MASSACHUSETTS,

Plaintiff,

v.

META PLATFORMS, INC. and
INSTAGRAM, LLC.

Defendant.

CIVIL ACTION NO.
2384CV02397-BLS1

COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT COURT

STATE OF NEW MEXICO, EX REL., RAÚL TORREZ,
ATTORNEY GENERAL,

Plaintiff,

v. No. D-101-CV-2023-02838

META PLATFORMS, INC.,
INSTAGRAM, LLC, META PAYMENTS, INC.,
META PLATFORMS TECHNOLOGIES, LLC, and
MARK ZUCKERBERG,

Defendants.

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1 THE WITNESS: Will do.

2 BY MS. BEREZOFSKY:

3 Q. Thank you.

4 Would you please state your
5 full name for the record.

6 A. Frances Haugen.

7 Q. Okay. Where do you currently
8 live?

9 A. I live in Carolina, Puerto
10 Rico.

11 Q. What college degrees did you
12 obtain?

13 A. I have a bachelor's of science
14 in engineering and I have a Master's in
15 Business Administration from Harvard. The BS
16 is from Olin College.

17 Q. And do you have any degrees in
18 computer engineering?

19 A. Mine is in electrical and
20 computer engineering.

21 Q. Okay. And you said that you
22 have another degree from Harvard?

23 A. Yes, I have a Master's in
24 Business Administration or an MBA.

25 Q. And when did you obtain that

1 degree?

2 A. 2011.

3 Q. Did you work for any tech
4 companies before going to Harvard Business
5 School?

6 A. Yes, I worked for Google for
7 three years.

8 Q. Is it correct that after
9 earning your master's degree from Harvard,
10 you worked at three different tech companies,
11 including Google and Yelp?

12 A. I worked for four. I worked
13 for -- I returned to Google, I went to Yelp,
14 I worked at Pinterest. I was briefly at
15 Gigster, and I then I went to Facebook.

16 Q. And were those all social media
17 companies?

18 A. At Google, I worked on Google+,
19 which is a social media platform. Yelp is a
20 social media platform and Pinterest is a
21 social media platform.

22 Q. Okay. And when did you begin
23 working at Meta?

24 A. I began working at Meta in
25 2019.

1 Q. Did you have a specific
2 interest or an interest in working in a
3 specific area or on a specific team at Meta?

4 A. They offered me a position on
5 the civic misinformation team, which was
6 under civic integrity.

7 Q. Was that important to you to
8 work on that team?

9 A. And I was excited to work on it
10 because I thought I would be working on
11 preparation for the 2020 election.

12 Q. Okay. Do you feel that you had
13 a special skill set or skills to work on that
14 team in particular?

15 A. I had seen how, in 2016, maybe
16 a lack of consideration for how features
17 might be misused, like Facebook later on
18 recognized that they had maybe not been as
19 proactive at critically looking at their
20 design as they needed to before 2016.

21 I felt that because I had
22 worked on so many social media platforms, I
23 could potentially add insight in preparation
24 for the election.

25 Q. What part of the company were

1 you hired to work in?

2 A. So it's civic integrity, which
3 was under the main integrity team.

4 Q. Would that have been part of
5 the broader umbrella team called civic
6 integrity?

7 A. So I was on civic
8 misinformation, which is under civic
9 integrity, which was under the larger
10 integrity work.

11 Q. Did you report to the head of
12 civic integrity?

13 A. Yes.

14 Q. And what did your work and
15 responsibilities on that team include?

16 A. We focused on misinformation
17 that was outside the scope of the third-party
18 fact-checking team for the big misinformation
19 team.

20 Q. What was your title there?

21 A. I was a product manager.

22 Q. So you were product manager for
23 the civic misinformation team?

24 A. Yes.

25 Q. And what did -- were there

1 specific areas or problem areas that you
2 worked on while you were part of that team?

3 A. Like what were my
4 responsibilities or what --

5 Q. What did you work on? Yeah,
6 what were your responsibilities?

7 A. As a product manager, I was
8 responsible for helping to identify problems
9 to solve, articulating those problems and
10 gaining consensus with the team of what that
11 meant, helping the team to work together to
12 identify how to solve that problem, for
13 example, helping the engineers to articulate
14 these are the specific things we'll build to
15 solve it, and then helping to monitor and
16 course correct that work over the course of
17 deployment.

18 Q. Can you please provide an
19 example or two about the kinds of issues or
20 harms that you were referring to --

21 A. Sure.

22 Q. -- to problems?

23 A. Initially, we primarily focused
24 on misinformation under languages that
25 Facebook did not serve through third-party

1 fact checking, which was the vast majority of
2 languages in the world.

3 Basically, if you look outside
4 of the United States and Europe, it was
5 likely you didn't have third-party fact
6 checking.

7 Misinformation in times of
8 crises, because it takes reporters time to
9 catch up, and misinformation that was too
10 small, like too narrowly focused to be caught
11 by the viral misinformation team.

12 Q. And were you tasked with
13 finding solutions to address those problems?

14 A. Yes.

15 Q. And did you understand that
16 Meta had the capability to address
17 problematic issues, the problematic issues
18 that you were discussing?

19 A. Yes. There's many ways you
20 could approach those problems.

21 Q. Were you at some point assigned
22 to another team at Meta?

23 A. Our whole team was repurposed
24 to focus only on narrowcasting after about
25 three months.

1 MS. BEREZOFSKY: Yeah.

2 MR. WARREN: Great.

3 (Whereupon, Haugen-9,
4 Photograph of File, Have we made
5 people addicted to Facebook,
6 Haugen_00016893 - Haugen_00016920, was
7 marked for identification.)

8 BY MS. BEREZOFSKY:

9 Q. I'm also going to hand you a
10 series of documents that I'm going to -- it's
11 a list of documents -- strike that. Okay.

12 I've handed you a stack of
13 documents, and we're going to mark them
14 individually as we go along. And I'm going
15 to ask you a series of questions about them,
16 and I'm going to read off the Bates numbers.

17 And I'm going to ask you if you
18 recognize them and if they came from Meta's
19 files, and if you took photos of the original
20 documents. All right.

21 Let's go through them. The
22 first one is Haugen_00016893.

23 A. Uh-huh.

24 Q. It's a document, We've made
25 people -- Have we made people addicted to

1 A. Yes, I do.

2 Q. And do you recognize it as one
3 that you brought out of Meta?

4 A. Yes.

5 MR. PEREZ-MARQUES: Object to
6 form, and I'll interpose an objection
7 to the prior question of do you
8 recognize this document.

9 Objection, form.

10 BY MS. BEREZOFSKY:

11 Q. Let's look at the next one,
12 Exhibit -- marked as Exhibit 19, and that's
13 Bates number Haugen_00017069 through
14 Haugen_00017176, and it's titled -- or the
15 front page of it, the first page is -- the
16 top reads: Wendy Gross uploaded a file in
17 this group, Instagram Insights, October --
18 dated October 10th, 2019.

19 (Whereupon, Haugen-19,
20 Photograph of File, Teen Mental Health
21 Deep Dive, Haugen_00017069 -
22 Haugen_00017176, was marked for
23 identification.)

24 BY MS. BEREZOFSKY:

25 Q. Do you recognize this document?

1 MR. PEREZ-MARQUES: Object to
2 form.

3 A. Yes, I do.

4 BY MS. BEREZOFSKY:

5 Q. And do you recognize it as one
6 that you brought out of Meta?

7 MR. PEREZ-MARQUES: Object to
8 form.

9 A. Yes, I do.

10 BY MS. BEREZOFSKY:

11 Q. Let's look at Exhibit 20, and
12 that's Haugen_00008 --

13 THE WITNESS: Wait. Sorry, I
14 have 22.

15 MR. LEVY: There you go.

16 THE WITNESS: Okay. Thank you.

17 Okay. Yep.

18 BY MS. BEREZOFSKY:

19 Q. -- Haugen_00008303 through
20 Haugen_00008315.

21 (Whereupon, Haugen-20,
22 Photograph of File, Households & IG:
23 Experiential Needs, Haugen_00007988 -
24 Haugen_00008016, was marked for
25 identification.)

1 interpreted by you with the benefit of your
2 experience; is that fair?

3 MR. LEVY: Objection, form.

4 A. And in addition, my experiences
5 at Facebook prior to reading those documents.

6 BY MR. PEREZ-MARQUES:

7 Q. Right.

8 So you know, on that issue of
9 what considerations went into adopting or
10 declining to adopt any particular teen mental
11 health product change, you know only what
12 you've seen in the documents as interpreted
13 with the benefit of your experience; is that
14 right?

15 MR. LEVY: Objection, form.

16 A. Well, I think it's important to
17 contextualize it within the framework of how
18 changes were shipped within Facebook. So,
19 for example, I brought out multiple documents
20 that go into detail of people talking about
21 safety being an afterthought, that there was
22 a firefighter -- an arsonist firefighter
23 culture where you didn't get rewarded for
24 fixing problems up front, but you get
25 rewarded after there was a fire drill.

1 So while I can't tell you
2 directly, like, this is exactly why this
3 feature did or did not ship or why this
4 feature did or did not ship or this is why
5 they didn't fund this group that would have
6 developed those features in the first place,
7 there was an ongoing trend of not
8 prioritizing safety as high as it should have
9 been, especially when dealing with a
10 vulnerable group like children.

11 BY MR. PEREZ-MARQUES:

12 Q. Okay. And that's something, as
13 pertains to teen mental health, you're
14 relying on your reading of the documents to
15 come to that view; is that right?

16 MR. LEVY: Objection, asked and
17 answered.

18 A. What I just said was based on,
19 you know, multiple experiences within civic
20 integrity, of watching products come into
21 these conflicts between growth and safety,
22 and numerous documents discussing the
23 internal culture and a practice of rewarding
24 people after things went wrong, not
25 beforehand -- remember, this plays into the

1 CERTIFICATE

2 I, MICHAEL E. MILLER, Fellow of
3 the Academy of Professional Reporters,
4 Registered Diplomate Reporter, Certified
5 Realtime Reporter, Certified Court Reporter
6 and Notary Public, do hereby certify that
prior to the commencement of the examination,
FRANCES HAUGEN was duly sworn by me to
testify to the truth, the whole truth and
nothing but the truth.

7 I DO FURTHER CERTIFY that the
8 foregoing is a verbatim transcript of the
9 testimony as taken stenographically by and
before me at the time, place and on the date
hereinbefore set forth, to the best of my
ability.

10 I DO FURTHER CERTIFY that pursuant
11 to FRCP Rule 30, signature of the witness was
12 not requested by the witness or other party
before the conclusion of the deposition.

13 I DO FURTHER CERTIFY that I am
14 neither a relative nor employee nor attorney
15 nor counsel of any of the parties to this
16 action, and that I am neither a relative nor
employee of such attorney or counsel, and
that I am not financially interested in the
action.

17
18
19 <%20911,Signature%>

20
21 MICHAEL E. MILLER, FAPR, RDR, CRR
22 Fellow of the Academy of Professional Reporters
NCRA Registered Diplomate Re9porter
NCRA Certified Realtime Reporter

23 Dated: September 29, 2025
24
25