

AMENDED Exhibit 250

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

PURSUANT TO PROTECTIVE ORDER

Page 1

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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IN RE: SOCIAL MEDIA ADOLESCENT) MDL No. 4:22-md-
ADDITION/PERSONAL INJURY) 3047-YGR
PRODUCTS LIABILITY LITIGATION)
-----X

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. for
SOCIAL MEDIA CASES) Filing Purposes
22STCV21355

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This Document Relates to:)
STATE OF TENNESSEE, et al.,)
vs.)
META PLATFORMS, INC., and) CONTAINS HIGHLY
INSTAGRAM, LLC, Case No.) CONFIDENTIAL
23-1364-IV) INFORMATION
-----X

VIDEOTAPED DEPOSITION OF NONA YADEGAR

LOS ANGELES, CALIFORNIA

MONDAY, DECEMBER 16, 2024

9:35 A.M.

Job No.: 7040317

Pages: 1 - 418

Reported by: Leslie A. Todd, CSR No. 5129 and RPR

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1 Videotaped deposition of NONA YADEGAR, held
2 at the offices of:

3
4
5 MUNGER, TOLLES & OLSON, LLP
6 350 South Grand Avenue, 50th Floor
7 Los Angeles, California 90071-3426
8 (213) 683-9100
9

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19 Pursuant to notice, before Leslie Anne Todd,
20 California Certified Shorthand Reporter in and for
21 the State of California, who officiated in
22 administering the oath to the witness.
23
24
25

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A P P E A R A N C E S

ON BEHALF OF PLAINTIFFS:

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23 ALSO PRESENT:

24 JULIA BREDRUP (SNAP, INC.) (via Zoom)
25 DAVID KIM, Videographer
CHRIS FAULK, Document Technician
MARIAM OLADIPO (via Zoom)
SUZANNE GOMEZ (via Zoom)

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1 I'm sorry.

2 BY MR. BILSBORROW:

3 Q. Ms. Yadegar, have you seen this
4 document before?

5 A. I believe you pulled this from my
6 LinkedIn in profile.

7 Q. Ms. Yadegar, I'll represent to you
8 that this was produced to us by your lawyers in
9 this case.

10 MS. TELLER: Objection.

11 Foundation, if that's a question.

12 BY MR. BILSBORROW:

13 Q. Is this a fair and accurate copy of
14 your resume?

15 A. Yes.

16 Q. You created it?

17 A. Yes.

18 Q. Do you update your resume when
19 necessary?

20 A. Yes.

21 MS. TELLER: Objection. Vague.

22 BY MR. BILSBORROW:

23 Q. Is this resume up to date?

24 A. I think so. Yes, it appears to be.

25 Q. Let me ask you about a few items on

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1 the resume in particular.

2 You're an attorney?

3 A. I don't know what the definition of
4 "attorney" is in terms of like active status with
5 the bar, which I don't believe I have, but I
6 would have to check on that. But I -- I have a
7 JD.

8 Q. You have a JD. For the jury, a law
9 degree, correct?

10 A. Yes, I have a law degree.

11 Q. You went to law school?

12 A. I went to law school.

13 Q. And you at some point were a
14 practicing attorney, correct?

15 A. Yes, for a short time.

16 Q. You received your law degree from
17 Columbia University in New York?

18 A. Yes.

19 Q. When you were at Columbia, you were
20 the student body president, correct?

21 A. Student senate president was the
22 technical term, but yes.

23 Q. And after you graduated, you
24 practiced at a law firm, correct?

25 A. Yes.

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1 Q. Latham & Watkins?

2 A. Yes.

3 Q. Was that in New York or somewhere
4 else?

5 A. I was a summer associate in Los
6 Angeles and a practicing lawyer in New York City.

7 Q. You were a practicing lawyer after
8 law school from October 2013 to November 2014; is
9 that right?

10 A. I believe so, yes.

11 Q. Did you have any particular
12 specialty you were practicing in?

13 A. No.

14 Q. Why did you leave Latham & Watkins
15 after just over a year?

16 A. I didn't feel inspired by the
17 practice of law at a corporate law firm. Sorry
18 to all present.

19 Q. You're honest.

20 After you left Latham & Watkins,
21 you took a job as director of trust and safety at
22 Whisper app. Do you see that?

23 A. Yes.

24 Q. What is Whisper app?

25 A. It no longer exists.

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1 Q. What was Whisper app?

2 A. It was an app that generated an
3 image for you to be able to share information on
4 top of -- roughly.

5 Q. I'm sorry. Generate information to
6 share --

7 A. Generate -- it was image -- it was
8 a stock image-based, text-based sharing system.
9 Sorry. That's not a great way to say it.

10 Q. What did you do as director of
11 trust and safety at Whisper app?

12 A. I lead the various teams that
13 rolled up to our safety efforts.

14 Q. And you were with Whisper from
15 November 2014 to June 2016?

16 A. Yes.

17 Q. And in July 2016, you started at
18 Snap, correct?

19 A. Correct.

20 Q. You started in -- at Snap in the
21 trust and safety department, correct?

22 A. Yes.

23 Q. You actually started as the head of
24 trust and safety at Snap.

25 A. I started in -- no, I did not start

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1 as the head of trust and safety. I kind of -- I
2 collapsed in each of these sections, less -- you
3 know, lesser roles that then ended with these. I
4 started as the online safety lead.

5 Q. Did you have any other positions in
6 trust and safety other than online safety lead
7 and the head of the department?

8 A. I don't believe so. I would have
9 to like look at my very particular -- I don't
10 have a record of that, but I don't believe so.

11 Q. Do you remember who was head of
12 trust and safety when you started in July of
13 2016?

14 A. There was no specific head of trust
15 and safety. It was led -- the department and
16 other functions were led by [REDACTED], who I
17 believe had a broader title than just trust and
18 safety.

19 Q. Do you recall when you became head
20 of trust and safety at Snap?

21 A. No. There was a time where -- when
22 I came in, trust and safety was split across
23 three leads, and then at some point I was
24 promoted to manage the entire team. I would have
25 to look at records to know the exact date.

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1 Q. What were your primary
2 responsibilities as head of trust and safety at
3 Snap?

4 A. As head of trust and safety, I was
5 in charge of our user-generated content policies,
6 various educational materials for parents and
7 other stakeholders, and reviewing reports and
8 actioning them.

9 Q. When you say "reviewing reports and
10 actioning them," are you referring to reports of
11 harmful content on the app?

12 A. Reports -- any reports of potential
13 community guideline violations.

14 Q. Which could include harmful
15 content, correct?

16 A. Yes.

17 Q. Your resume indicates that you had
18 some responsibility for global content moderation
19 and enforcement operations.

20 Do you see that?

21 A. Yes.

22 Q. What did -- what did that entail?

23 A. As I said, the team was responsible
24 for reviewing reports. During my time we scaled
25 our review operations to be global and to have

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1 locations throughout the world that could assist
2 in that moderation.

3 Q. During the time that you were head
4 of trust and safety, did you have responsibility
5 to moderate Snapchat's public-facing surfaces,
6 like Discover or Spotlight?

7 A. I can't recall specifically, and we
8 would have certainly advised had there been
9 questions of it, but I think at that time the
10 teams that ran those surfaces might have been
11 more responsible for them.

12 Q. So is it fair to say that your
13 primary content moderation responsibility was
14 over user-to-user communications?

15 A. Yes.

16 Q. We just referenced Snap's --
17 Snapchat's surfaces. Is that a term you're
18 familiar with?

19 A. No, but I understand what one would
20 mean by using the term "surface."

21 Q. I've seen some of the documents
22 refer to the Discover surface or the Spotlight
23 surface. Is that generally just a reference to
24 those portions of Snapchat?

25 MS. TELLER: Objection. Vague.

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1 THE WITNESS: I can't say
2 because I don't know what you're
3 referring to, but that's what I would
4 assume, just the colloquial meaning of
5 the word "surface." It's definitely not
6 like a technical term that we use.

7 BY MR. BILSBORROW:

8 Q. Your resume also indicates that
9 during the time that you were in the trust and
10 safety department at Snap, you had some
11 responsibility for safety policy development.

12 Do you see that?

13 A. Yes.

14 Q. What safety policies were you
15 involved or responsible for developing?

16 A. That's what I referred to when you
17 first asked what I did, which was our
18 user-generated content policies, meaning
19 documentation that defined the guidelines and the
20 enforcement actions that needed to be taken as a
21 result.

22 Q. What is user-generated content?

23 A. Content made and posted and sent by
24 the user themselves.

25 Q. Okay. So when you refer to

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1 user-generated content policies, that's a
2 reference to policies that govern what users can
3 post and send to other users. Fair?

4 A. Yes.

5 Q. Were you in charge or responsible
6 for developing any other safety policies during
7 your time with trust and safety other than the
8 user-generated content policies?

9 A. Like a specific, defined set of
10 policies? I don't think so. But I certainly
11 would be involved in conversations around policy
12 development, but I was not on the policy team.

13 Q. According to your resume, you also
14 had responsibility for design and implementation
15 of in-app reporting during the time that you were
16 head of trust and safety, true?

17 A. Yes.

18 Q. Tell me about your experience with
19 the design and implementation of in-app
20 reporting.

21 MS. TELLER: Objection. Vague.

22 THE WITNESS: We worked with the
23 design team and engineers, and various
24 folks got together to design a Snapchat
25 reporting flow and tool that was another

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1 level of sophistication from what we had
2 in app at that time.

3 BY MR. BILSBORROW:

4 Q. When you were working with the
5 design team to design this in-app reporting flow,
6 was it possible for users on Snapchat to make
7 in-app reports?

8 A. Yes.

9 Q. What -- what was different about
10 the implementation of in-app reporting that --
11 that you were responsible for?

12 A. I -- it's like been a long time, so
13 I don't remember the specifics. But in order to
14 generate reports when I first joined, the report
15 would then populate in Zendesk, and was like not
16 entire -- like it wasn't a tool completely run by
17 Snapchat. So in this case what would happen was
18 the report would then generate in an internal
19 tool, instead of an external service that we used
20 for customer service.

21 Q. As the head of trust and safety at
22 Snap from July 2016 -- or at some point between
23 July 2016 and July 2018, did you have any
24 responsibility for transparency reports?

25 A. You know, I can't recall.

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1 Q. You're familiar with transparency
2 reports, correct?

3 A. Yes.

4 Q. What is your understanding of
5 Snap's transparency reports?

6 A. At some --

7 MS. TELLER: Objection.
8 Foundation.

9 THE WITNESS: At some point I
10 was responsible for them, but I don't --
11 I don't -- I don't recall that I was at
12 this time.

13 BY MR. BILSBORROW:

14 Q. Ms. Yadegar, as head of trust and
15 safety, did you have direct reports?

16 A. Yes.

17 Q. Who was your direct -- who were
18 your direct reports?

19 A. I have no recollection of them.

20 Q. Do you recall who you reported to?

21 A. [REDACTED]

22 Q. Anyone else?

23 A. She's the only person I reported to
24 in that role.

25 Q. How big was the trust and safety

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1 BY MR. BILSBORROW:

2 Q. How about this: If Snap knows that
3 part of its platform is posing a risk to minor
4 safety -- minor user safety, Snap should warn
5 minor users of that risk. Do you agree?

6 MS. TELLER: Objection. Vague,
7 incomplete hypothetical, asked and
8 answered.

9 THE WITNESS: I think we have a
10 responsibility to educate our community
11 about the risks that can -- they can
12 experience using Snapchat. One of the
13 ways to do that could be to warn them,
14 yes.

15 BY MR. BILSBORROW:

16 Q. And that would be Ethics by Design,
17 right?

18 MS. TELLER: Objection. Vague.

19 THE WITNESS: I have no idea
20 what Ethics by Design is.

21 BY MR. BILSBORROW:

22 Q. Well, take a look at point number 2
23 on slide 464. It says: "We want to empower our
24 community with the tools and knowledge to control
25 their experiences when using our products,

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CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

The undersigned Certified Shorthand Reporter
does hereby certify:

That the foregoing proceeding was taken before
me at the place and time therein set forth, at
which time the witness was duly sworn; That the
testimony of the witness and all objections made
at the time of the examination were recorded
stenographically by me and were thereafter
transcribed, said transcript being a true and
correct copy of my shorthand notes thereof; That
the dismantling of the original transcript will
void the reporter's certificate.

In witness thereof, I have subscribed my name
this date: January 6, 2025.

A handwritten signature in blue ink that reads "Leslie Anne Todd". The signature is written in a cursive style and is positioned above a horizontal line.

LESLIE A. TODD, CSR, RPR

Certificate No. 5129

(The foregoing certification of
this transcript does not apply to any
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unless under the direct control and/or
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