

AMENDED Exhibit 6

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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ADAM S. MOSSERI,
having been duly sworn,
testified as follows:

EXAMINATION

BY MR. RAVIPUDI:

Q. Good morning.

A. Good morning.

Q. Please state your full name for
the record.

A. Adam Solomon Mosseri.

Q. And you're the head of
Instagram?

A. I am.

Q. And as the head of Instagram,
you're in charge of all of the operations?

A. Yes. I'm in charge of the
product teams, the design teams, some of the
business teams, which is a word we use to
describe partnerships, comms and marketing.
But some of the work that we do is built on
the foundations of core teams at Meta.

Q. And so you're in charge of

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1 deciding issues relating to products?

2 A. Primarily, yes.

3 Q. Okay. And we're here taking a
4 deposition today as part of a lawsuit against
5 Meta.

6 You understand that?

7 A. I do.

8 Q. And you understand you're under
9 oath?

10 A. I do.

11 Q. That oath is under penalty of
12 perjury?

13 A. I understand.

14 Q. Have you ever given your
15 deposition before?

16 A. I've given depositions before,
17 but not around this specific set of issues.

18 Q. When is the last time you sat
19 for a deposition?

20 A. It was -- so it was about two
21 years ago. What is it, 2025 now, so I'd say
22 roughly two years ago.

23 Q. Okay. Do you understand the
24 rules of the deposition?

25 A. I believe so.

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1 A. I try my best to be.

2 Q. So that's a yes?

3 A. It's I try my best. I'm sure
4 I've made mistakes at times, but I also try
5 to correct my mistakes when I make them.

6 Q. Okay. Instagram is a social
7 media platform?

8 A. You could call it that, yes.

9 Q. Is that what you call it?

10 A. We talk about it as a platform.
11 We talk about it as a place where people can
12 connect with friends and explore their
13 interests.

14 Q. Do you call it a social media
15 platform or is it some other moniker?

16 A. We don't usually refer to it as
17 any specific moniker, but I don't take issue
18 with calling it a social media platform.

19 Q. Okay. Do you call it an app?

20 A. Often.

21 Q. Is Instagram typically accessed
22 through smartphones?

23 A. Most of how Instagram is
24 accessed is through smartphones, yes.

25 Q. Same with Facebook. That's

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1 another social media app?

2 A. Yes, most of how people access
3 Facebook is via smartphones, but they also
4 access it through what we call feature
5 phones, so less sophisticated phones, and
6 through the web.

7 Q. So it's a social media
8 platform?

9 A. Yes.

10 Q. Instagram is an advertising
11 business?

12 A. The primary way we make money
13 is through advertising, so yes.

14 Q. Instagram has competitors?

15 A. Yes.

16 Q. YouTube?

17 A. One of them.

18 Q. TikTok?

19 A. Certainly.

20 Q. Snapchat?

21 A. Yes.

22 Q. Any others?

23 A. Yeah, we compete with messaging
24 apps. Actually, the primary way people share
25 on Instagram is through messaging, so even if

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1 Go ahead.

2 A. I'm not an expert in
3 well-being, but it's not our goal for
4 business reasons.

5 BY MR. RAVIPUDI:

6 Q. Just for business reasons,
7 focusing on teen time spent is not a good
8 goal?

9 A. I don't think focusing -- I
10 don't think goaling on teen time spent is
11 good for the business for a variety of
12 reasons.

13 MR. RAVIPUDI: Okay. Let's put
14 next -- Exhibit 8 is 1728.

15 (Whereupon, Meta-Mosseri-8,
16 E-mail(s) re: Teens Strategic Focus H1
17 2017, META3047MDL-003-00172008 -
18 META3047MDL-003-00172040, was marked
19 for identification.)

20 THE WITNESS: Thank you.

21 (Document review.)

22 BY MR. RAVIPUDI:

23 Q. So if you look at page 1, you
24 see this was an e-mail sent to you?

25 A. It looks like [REDACTED] [REDACTED]

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1 forwarded an e-mail to me that he had sent to
2 a number of other leads across the country.

3 Q. Right. So this is an e-mail
4 that was sent to you on November 9th, 2016?

5 A. The forward, yes.

6 Q. Yeah.

7 And then what it forwards is an
8 e-mail sent to others within Meta?

9 A. Yes.

10 Q. And you see on the Tuesday,
11 November 8th, 2016 forward, second sentence:
12 Mark has decided that the top priority for
13 the company is -- in 2017 is teens.

14 Do you see that?

15 A. I do.

16 Q. And has asked the teens team to
17 coordinate planning and execution of a
18 strategic focus on teens in H1.

19 Do you see that?

20 A. I do.

21 Q. H1 means?

22 A. The first half of the year. We
23 divide the year into two halves, Half 1 and
24 Half 2.

25 Q. And then attached here is a

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1 slide deck.

2 Do you see that on page 4?

3 A. Yes.

4 Q. And just going back to the
5 e-mail on page 2 -- sorry about that.

6 A. No problem.

7 Q. Do you see the bold and
8 underlined: How the H12017 Teens Strategic
9 Focus will work.

10 Do you see that?

11 A. Sorry, is that on page 1? Are
12 you sure?

13 Q. Page 2, I'm sorry.

14 A. Okay. I was just going to say,
15 I was -- I thought something was wrong with
16 me.

17 How the H12017 Teens Strategic
18 Focus will work. I see that, yes.

19 Q. Then can you read the second
20 sentence?

21 A. The Teens team has a pool of --

22 Q. No, the second sentence in
23 line 1, sorry.

24 A. Sorry. I went to the second
25 bullet. Apologies.

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1 Our overall company goal is
2 total teen time spent, which is MAP times MAP
3 over -- so monthlies over dailies times time
4 spent over dailies. Sub-goal -- sorry I
5 should stop.

6 Q. So MAP is?

7 A. Monthly active people.

8 Q. And DAP?

9 A. Daily active people.

10 Q. TS?

11 A. Time spent.

12 Q. And then you see -- so you saw
13 there where it says the company's overall
14 goal is total teen time spent?

15 A. I see that.

16 Q. And then if you go on and you
17 go to the slide deck now on page 4, it says
18 it's a Teens Strategic Focus?

19 A. Sorry, I'm struggling with the
20 numbers. Can you give me the slide number?
21 It might be easier.

22 Q. It's the cover page of the
23 slide.

24 A. Oh, sorry.

25 MS. JONES: Are you referring

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1 to the thing -- at the top. He's
2 looking at the numbers at the top.

3 A. Oh, I was going to say I'm
4 looking at two different page numbers that
5 are different. Apologies.

6 BY MR. RAVIPUDI:

7 Q. Yeah, so in the upper right,
8 the .4?

9 A. I'm happy to go with whatever
10 number you like as long as -- so we'll do
11 upper right.

12 Q. Fair.

13 A. Yes, you asked if I saw that it
14 says 2017 Teens Strategic Focus.

15 Q. And there's a team within Meta
16 called the Teens team?

17 A. I believe so.

18 Q. And that Teens team is focused
19 on teen growth?

20 A. I believe that team was within
21 the Facebook app, and they were focused on
22 what we would call product market fit, so
23 making sure that we're creating something
24 that resonates with teens. Growth would be
25 one way they measure that.

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1 Q. And the 2017 -- what's a
2 top-line goal?

3 A. An important goal.

4 Q. Okay. If you go to .8.

5 A. I'm there.

6 Q. Do you see the 2017 Top-Line
7 Goal?

8 A. That's the name of the slide,
9 yes.

10 Q. Yep. The strategic goal is
11 time spent share, right?

12 A. Yes.

13 Q. And aggregate total time spent
14 is the operational metric?

15 A. Yes.

16 Q. So would you agree, in 2016,
17 Meta's overall goal was teen time spent?

18 MS. JONES: I'm going to object
19 to form and to characterization of the
20 document.

21 You can answer.

22 A. I believe -- did you mean to
23 ask for 2017?

24 BY MR. RAVIPUDI:

25 Q. Yes.

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1 MS. JONES: Same objection.

2 A. Yes, Mark is suggesting that
3 teen time spent be our top goal in 2017.

4 BY MR. RAVIPUDI:

5 Q. You're not here to dispute that
6 that was the top-line goal in 2017?

7 A. I don't know that we ever had
8 one top-line goal, but it's certainly
9 something that we cared about, as I said
10 before, an important goal in 2017.

11 MR. RAVIPUDI: Can we have
12 1190.

13 THE WITNESS: Is that another
14 exhibit?

15 MR. RAVIPUDI: Yeah.

16 THE WITNESS: Going on to
17 number 9?

18 MR. RAVIPUDI: Exhibit 8 -- or
19 9.

20 MS. JONES: 9.

21 MR. RAVIPUDI: Thank you.

22 (Whereupon, Meta-Mosseri-9,
23 E-mail(s) re: Teens and News Feed
24 Alignment, META3047MDL-003-00134794 -
25 META3047MDL-003-00134796, was marked

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1 A. Well-being is too complicated a
2 thing to be quantified as one metric.

3 Q. Is problematic use a metric at
4 Instagram?

5 A. I don't know of a specific
6 problematic use metric. I do think -- no, I
7 don't know of a specific way to quantify
8 problematic use as one metric.

9 Q. Is social media addiction a
10 metric at Instagram?

11 A. I don't think social media is
12 addictive. I don't think it's possible to
13 quantify addiction in a metric.

14 MR. RAVIPUDI: Okay. Let's go
15 to P-155.

16 (Whereupon, Meta-Mosseri-11, IG
17 Growth Onboarding - [REDACTED],
18 META3047MDL-019-00120925 -
19 META3047MDL-019-00120937, was marked
20 for identification.)

21 THE WITNESS: Thank you.

22 BY MR. RAVIPUDI:

23 Q. Do you know who [REDACTED]
24 is?

25 A. I don't remember [REDACTED] name

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1 off the top of my head, I'm sorry.

2 Q. IG is Instagram?

3 A. Yes.

4 Q. Growth, is that a team within
5 Instagram?

6 A. There's a team in Instagram
7 that focuses on growing Instagram.

8 Q. And here you see on this
9 document, it's an August 2021 document?

10 A. Where does it say that, by the
11 way?

12 Q. That's based on the information
13 provided by your counsel to us.

14 A. So sorry, say again, August of
15 '21?

16 Q. Yes.

17 A. Thank you, sir.

18 MS. JONES: Counsel, could I
19 just ask you, do you have a basis for
20 saying that Mr. Mosseri would have
21 received this document just in light
22 of the parties' stipulation with
23 respect to highly confidential
24 documents being used with witnesses
25 who have not otherwise received them?

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1 MR. RAVIPUDI: Apex deposition,
2 the agreement was we could use any
3 documents with this witness.

4 MS. JONES: With notice three
5 days in advance. Were we given notice
6 of this document? If not, we object
7 to the use of the document because
8 it's not consistent with the
9 stipulation that we have.

10 MR. RAVIPUDI: We can talk
11 about that off the record or do we
12 need to talk about that on the record?

13 MS. JONES: We're going to
14 object to questioning on the document
15 until we clarify that point. So maybe
16 you can come back to it once we've
17 talked about it.

18 BY MR. RAVIPUDI:

19 Q. In -- you can put the document
20 down. That's fine.

21 A. Sure.

22 Q. In 2021, was Instagram
23 concerned about US teen growth?

24 A. We care about growth in the US
25 of teens in 2021, as we do care about growth

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1 of teens in the broader population in every
2 country.

3 Q. Teen growth in the US is a
4 metric at Instagram?

5 A. Yes, we can measure
6 approximately how many teens use Instagram,
7 and we do keep -- we do look at that metric.

8 Q. Total teen time spent is a
9 metric at Instagram?

10 A. It's not a metric that we goal
11 on, but I'm sure it's a metric -- it's a
12 piece of data that we can look up.

13 Q. DAP of teens is a metric at
14 Instagram?

15 A. DAP would be how many -- teen
16 DAP would be how many teens use Instagram in
17 a given day, and that is another piece of
18 data that we can look at.

19 Q. And MAP of teens is a metric at
20 Instagram?

21 A. It is another piece of data
22 that we can look at.

23 Q. And would the decline of US
24 teen growth constitute an existential threat
25 for Instagram?

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1 A. I think if US teens were using
2 Instagram less, that would be a big concern
3 for Instagram because it would be a signal
4 that other people will probably use Instagram
5 less over time.

6 Q. So it would be an existential
7 threat?

8 MS. JONES: Objection, asked
9 and answered.

10 A. It would be a big risk.

11 BY MR. RAVIPUDI:

12 Q. And that's something that
13 Instagram does not want, is to lose -- have a
14 reduction in teen growth?

15 A. We believe that how many people
16 use Instagram is a signal of how much value
17 we're creating, so we do not want to see
18 people using the platform less over time. Or
19 I should say less people -- you said growth.
20 So people using Instagram less over time.

21 MR. RAVIPUDI: 610.

22 (Whereupon, Meta-Mosseri-12,
23 E-mail(s) re: Instagram Update -
24 9/11/23, META3047MDL-031-00078723 -
25 META3047MDL-031-00078725, was marked

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1 of Direct Messaging on Instagram.

2 MR. RAVIPUDI: Let's look at
3 1576. Exhibit 20.

4 (Whereupon, Meta-Mosseri-20,
5 E-mail(s) re: Message scanning,
6 META3047MDL-040-00215891 -
7 META3047MDL-040-00215895, was marked
8 for identification.)

9 THE WITNESS: Thank you.

10 (Document review.)

11 BY MR. RAVIPUDI:

12 Q. This is an e-mail chain started
13 on August 15th, 2018 by you with Guy Rosen,
14 [REDACTED] and then it goes through
15 August 30th, 2018?

16 A. August 15th to 30th, 2018, yes.

17 Q. It's talking about Instagram
18 Direct Messaging and the bad things that can
19 happen on it?

20 A. I think it's specifically
21 about -- I'm ramping up on Instagram, so I'm
22 still new. I'm not the head of Instagram
23 yet. It starts with me asking about two
24 things, message scanning, which integrity
25 problems do we use it for, and two, do we

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1 have yet a list of policies for messaging for
2 integrity problems.

3 Q. So as you're getting up to
4 speed, you look at page 1 here, and Guy Rosen
5 explains to you how Instagram Direct
6 Messaging can work.

7 Do you see that?

8 A. I don't think he's explaining
9 how Direct Messaging can work, no. Are
10 you -- is that what you meant to ask?

11 Q. Yeah. He's talking about an
12 example of how the messaging can work?

13 MS. JONES: I'm sorry, Counsel.
14 Was that just a question?

15 MR. RAVIPUDI: Yes.

16 MS. JONES: Okay.

17 A. I'm just reading.

18 MS. JONES: Let me object to
19 the form and asked and answered.

20 A. I think he's talking about not
21 how DMs work in general or how messaging
22 works in general, but he's talking about how
23 a negative experience can happen in
24 messaging.

25 ///

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1 BY MR. RAVIPUDI:

2 Q. In messaging?

3 A. Yes.

4 Q. Right.

5 And that would be Instagram
6 Direct Messaging would be one of those,
7 correct?

8 A. Yes. My whole question that I
9 kicked off this e-mail for was trying to
10 understand the state of our safety tooling in
11 the context of Instagram messaging.

12 Q. And so the example he gives is
13 someone looks me up on Instagram/Facebook,
14 because I'm a cute girl, sends me a message,
15 or even a friend request, and we start
16 messaging.

17 Do you see that?

18 A. I do.

19 Q. And then he says: That is
20 where all the bad stuff happens.

21 Do you see that?

22 A. I do.

23 Q. From less bad, Tier 2 sexual
24 harassment, like dudes sending dick pics to
25 everyone.

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1 Do you see that?

2 A. I do.

3 Q. That's bad stuff?

4 A. Yes.

5 Q. To Tier 1 cases where they end
6 up doing horrible damage.

7 Do you see that?

8 A. I do.

9 Q. Tier 1 cases, what are those?

10 A. I don't have specific examples,
11 but it sounds pretty horrific.

12 Q. And he uses the word "horrible"
13 in there?

14 A. He does.

15 Q. But dudes sending dick pics to
16 cute teen girls, is that horrible too?

17 A. It is.

18 Q. And that would all be the bad
19 stuff that he's talking about that happens?

20 A. He -- these would be different
21 types of bad things that could happen in
22 messaging.

23 Q. And that's not something
24 that -- strike that.

25 MR. RAVIPUDI: Let's go to clip

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1 34.

2 MS. JONES: Is this Exhibit 21,
3 just for the record?

4 MS. HUDNALL: Yeah.

5 MS. JONES: Okay. Got it.
6 Thank you.

7 (Whereupon, Meta-Mosseri-21,
8 Media File, Armchair Expert Podcast
9 Excerpt, was marked for
10 identification.)

11 BY MR. RAVIPUDI:

12 Q. Exhibit 21, this is from that
13 March 13th, 2020 Armchair Expert podcast.

14 A. What was that?

15 Q. Have you seen this podcast?
16 You remember this?

17 A. I remember this, yes.

18 MR. RAVIPUDI: You can play it.
19 (Whereupon, the media was
20 played in the deposition room.)

21 BY MR. RAVIPUDI:

22 Q. That's an accurate statement?

23 A. Yes.

24 Q. And so these -- what's
25 reflected here as an example by Guy Rosen on

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1 Exhibit 20 is something that's not monitored?

2 A. Not necessarily. So we do
3 actually scan direct messages for known
4 instances of child exploitative imagery, but
5 we do not scan direct messages or private
6 direct messages for everything. We're trying
7 to balance people's interest in privacy and
8 not wanting us to scan everything with our
9 interests in safety.

10 Q. And so the example of a teen
11 getting transmitted a dick pic from an adult
12 is not something that would be monitored by
13 Instagram?

14 A. I think now we have nudity
15 control where I believe we use a client-side
16 classifier to try to understand and block --
17 or block out something like that. So that
18 would be a form of monitoring, or you could
19 call it a form of monitoring.

20 I don't remember exactly what
21 year we implemented that.

22 Q. As of February of 2020, that
23 was not in existence?

24 A. I don't know.

25 Q. In August of 2018, that was not

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1 in existence?

2 A. I don't believe so, but as you
3 can see from this e-mail, I was ramping up on
4 what was in existence.

5 Q. In August of 2020 -- sorry.
6 In -- strike that.

7 In February of 2020, did
8 Instagram notify the public or parents that
9 Direct Messaging where adults can send dick
10 pics to their minor children is not something
11 that's being monitored?

12 MS. JONES: I'm going to object
13 to the form and the characterization.
14 You can answer.

15 A. I don't remember when we
16 implemented the nudity filter. That was
17 client side. Client side just means on the
18 phone. It might have been around that year
19 or it might have been after that year.

20 Certainly when we announced
21 that feature, which we did very publicly, it
22 would have been implied or clear that it
23 didn't exist before we announced it and did
24 exist after.

25 ///

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1 BY MR. RAVIPUDI:

2 Q. So prior to this filter getting
3 implemented, did Instagram notify parents or
4 the public that Direct Messaging on Instagram
5 was not being monitored and adults could send
6 dick pics or other horrible things to minor
7 children?

8 MS. JONES: Same objection.

9 You can answer.

10 A. I don't agree with the
11 qualification that they could. We certainly
12 were trying to minimize this. But I think
13 that it's pretty clear that you can message
14 problematic content in any messaging app,
15 whether it's Instagram or otherwise.

16 BY MR. RAVIPUDI:

17 Q. The nudity filter you're
18 talking about was implemented April 11th,
19 2024?

20 A. I don't remember the year.

21 Q. You don't remember last year?

22 A. We implement a lot of safety
23 features. I remember last year. I don't
24 remember what year that filter launched.

25 Q. I mean, so you're talking about

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1 a ramp-up in 2018 that ramped up for six
2 years?

3 MS. JONES: Hold on.

4 Objection to the form and to
5 the characterization of his testimony.
6 You can answer.

7 A. So a ramp-up was me learning
8 about what was happening on Instagram. We've
9 implemented a number of safety features
10 specifically around teens and messaging over
11 the years. That is one of many.

12 There's levels of defense.
13 Adults aren't allowed to message teens unless
14 they're connected to them. We proactively
15 try to assess adults who might be
16 participating in risky behavior, and for
17 them, we try to take further precautions to
18 prevent them from discovering teens.

19 So this specific feature sounds
20 like it launched in 2024, but there are many
21 other messaging safety features that launched
22 between 2018 and 2024.

23 BY MR. RAVIPUDI:

24 Q. I mean, earlier you were trying
25 to make it sound like you were getting ramped

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1 up to protect kids from getting dick pics on
2 Instagram Direct Messaging, but it didn't
3 happen until April of 2024?

4 MS. JONES: Objection to the
5 form, and to the characterization of
6 his testimony.

7 You can answer.

8 A. I think we did a number of
9 things between 2018 and 2024 to reduce
10 negative interactions or inappropriate
11 interactions with children, which include
12 your example between 2018 and 2024.

13 BY MR. RAVIPUDI:

14 Q. It's not my example. Guy Rosen
15 gave it to you in August of 2018.

16 A. And we did a number of things
17 to try to adjust that between 2018 and 2024.

18 Q. But only in 2024 were parents
19 notified of a potential reduction in nudity
20 and inappropriate interactions with children
21 on Instagram Direct Messaging?

22 A. I'm sure we talk about risks
23 that exist in messaging in general, but to be
24 super clear, you're asking if we proactively
25 messaged parents that someone could send

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1 something inappropriate in a message. That
2 is something that I think is clear given that
3 the most popular messaging apps that exist
4 today are fully encrypted.

5 Q. So Instagram, in its efforts of
6 transparency -- I can't go to the website in
7 2023, 2022, 2021, 2020 and have an express
8 and clear disclosure that your kids on
9 Instagram could have inappropriate
10 interactions leading to DICK pics, grooming
11 by pedophiles, things like that?

12 MS. JONES: Hold on.

13 Objection to the form, asked
14 and answered.

15 Go ahead.

16 A. We certainly have talked
17 publicly about inappropriate interaction with
18 children before 2024. The website might not
19 have any mentions of it, but it's by far the
20 least important communication channel we
21 have.

22 MR. RAVIPUDI: Move to strike
23 everything after the website wouldn't
24 have any mentions of it.

25 Okay. Let's go with 1814.

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1 BY MR. RAVIPUDI:

2 Q. Now, when, as the head of
3 Instagram, with these once-a-week,
4 twice-a-week, multiple-time-a-week postings
5 that you do, in any of them, did you say,
6 hey, community, Instagram community, just
7 want to let you know there's around 200,000
8 child victims a day of inappropriate
9 interactions with children, Tier 2?

10 MS. JONES: Objection to the
11 form.

12 You can answer.

13 A. No, I never made a post that
14 named this statistic, which is in a document
15 that I don't know that I ever received.

16 MR. RAVIPUDI: Move to strike
17 everything after the answer "no."
18 Okay.

19 Let's go with Exhibit P-1585.

20 (Whereupon, Meta-Mosseri-36,
21 Mosseri Performance Review,
22 META3047MDL-074-00105340 -
23 META3047MDL-074-00105360, was marked
24 for identification.)

25 THE WITNESS: Thank you.

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1 BY MR. RAVIPUDI:

2 Q. Do you recognize this document?

3 A. This looks like my
4 self-review -- sorry. This is multiple
5 things. This is -- we have a process called
6 a performance cycle, and this is feedback
7 that a number of people wrote about me in
8 what looks like 2023.

9 It looks like it's mostly
10 people who reported to me directly.

11 Q. So it also includes your
12 self-review?

13 A. I -- it should. Let me
14 double-check. Yes, here it is.

15 Q. So this is a self-review of
16 your 2022 year or your 2023 year or what time
17 period?

18 A. If this was written on July 3rd
19 of 2023, then it would have been for the
20 first half of 2023, because we -- at this
21 point, I think we're primarily organizing our
22 performance cycle on halves, half years.

23 Q. So in this self-review, if you
24 look at what impact have you achieved.

25 Do you see that?

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1 A. It says: What impact have you
2 achieved so far?

3 Q. And then the first paragraph
4 talks about your metrics, right?

5 A. It talks about sharing,
6 messaging, engagement, growth and revenue.

7 Q. Revenue are at all-time highs?

8 A. That's what it says.

9 Q. Despite cutting the team by
10 13%?

11 A. Yes.

12 Q. Anywhere in here does it talk
13 about teen well-being?

14 A. No. In general, the Well-Being
15 team, as we've talked about before, is
16 primarily centralized. So I would have been
17 focusing more on the work that's done
18 primarily on my teams, not the central teams.

19 Q. So as the head of Instagram, as
20 you're doing your self-review, you're
21 focusing on revenue and things of that
22 nature?

23 A. Actually not revenue either.
24 Revenue is also primarily centralized.

25 Q. It's written right here?

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1 A. It is, but it's not the focus,
2 if you read the whole self-review.

3 I think we would primarily be
4 focused on is Instagram valuable to people,
5 teens and adults, would be primarily what I
6 would focus my self-review on, because that's
7 the work that my team uniquely does.

8 Q. Less focus on Instagram's
9 value.

10 Instagram is valuable to Meta.
11 Would you agree?

12 A. I would agree that Instagram is
13 valuable to Meta.

14 Q. Instagram generates a
15 significant amount of revenue for Meta.
16 Would you agree?

17 A. Yes.

18 Q. Instagram generates a
19 significant amount of net profits for Meta.
20 Would you agree?

21 A. Instagram delivers a
22 significant amount of net profits.

23 Q. Yes?

24 A. Yes.

25 Q. And when you're talking about

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1 net profits as the head of Instagram, 2023,
2 what were -- what were your net profits?

3 A. I don't believe I talk about
4 net profits in this self-review.

5 Q. I'm asking you: What were your
6 net profits as the head of Instagram in 2023?

7 A. For Meta?

8 MS. JONES: Let me just object
9 to the form, please.

10 BY MR. RAVIPUDI:

11 Q. For Instagram.

12 MS. JONES: Excuse me.

13 A. In the billions of dollars. I
14 don't have an exact number for the first half
15 of 2023.

16 BY MR. RAVIPUDI:

17 Q. Nonetheless, teams were cut by
18 13%, correct?

19 A. Yes. We are looking for ways
20 to be more efficient.

21 Q. The trajectory of Instagram, if
22 you're going year over year, 2021, 2022,
23 2023, the DAP was going up?

24 A. The number of users that use
25 Instagram over those years has gone up, yes.

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1 Q. And it's now getting to the
2 point where it's close to matching Facebook?

3 A. I think there's a ways to go to
4 catch up with Facebook, but there's, like we
5 talked about earlier, over 2 billion people
6 on Instagram.

7 Q. And with the DAPs and monthly
8 active users continuing to go up, so does the
9 revenue, correct?

10 A. In general, yes.

11 Q. And then, so does the net
12 profits, correct?

13 A. Usually, yes.

14 Q. Nonetheless, there's cuttings
15 of the teams by 13%, correct?

16 A. I don't know actually that the
17 team was shrunk overall by 13%. We did a 13%
18 cut, as is mentioned here, but we also grew
19 the team in other areas. So this actually
20 happens every year now where teams both
21 receive new resources and budget for things
22 like hiring as well as proactively make
23 efficiency cuts and try to reduce investments
24 in certain areas.

25 Q. I'm sorry, I'm just reading

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1 what you wrote here on page 3.

2 All of this happened despite
3 cutting the team by 13%.

4 Do you see that?

5 A. I see that.

6 Q. Which is double the size of the
7 cuts we made in H2 of 2022.

8 Do you see that?

9 A. I do see that.

10 Q. So even the year before there
11 were cuts, right?

12 A. There have been cuts, I think
13 in every year since 2022. That doesn't mean
14 that the team actually got smaller, because
15 there was also additions.

16 MR. RAVIPUDI: Okay. Let's go
17 to 1590.

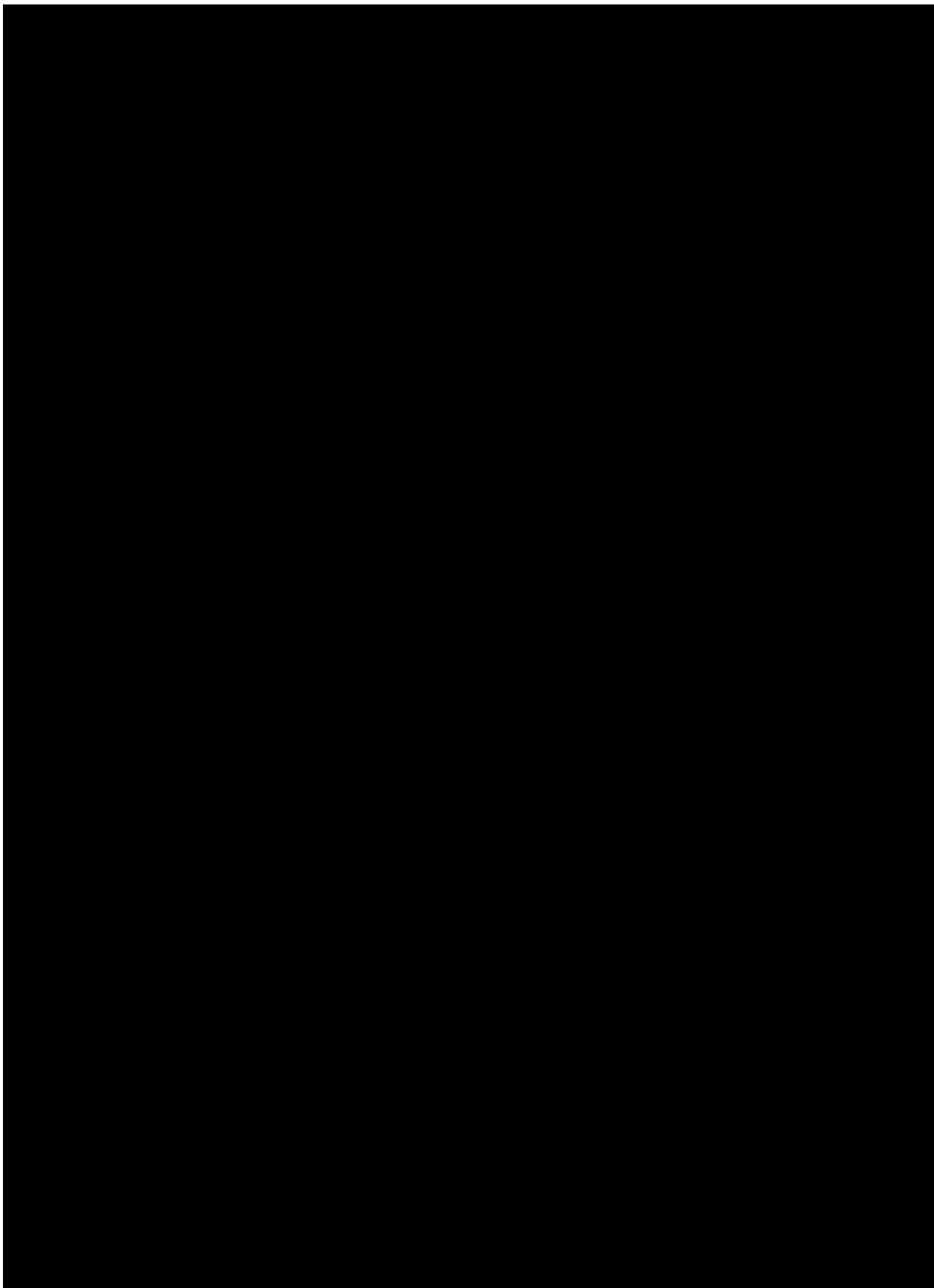
18 (Whereupon, Meta-Mosseri-37,
19 Adam Mosseri 2022 PSC Feedback,
20 META3047MDL-014-00080549 -
21 META3047MDL-014-00080555, was marked
22 for identification.)

23 MR. RAVIPUDI: And then let's
24 get 1589.

25 (Whereupon, Meta-Mosseri-38,

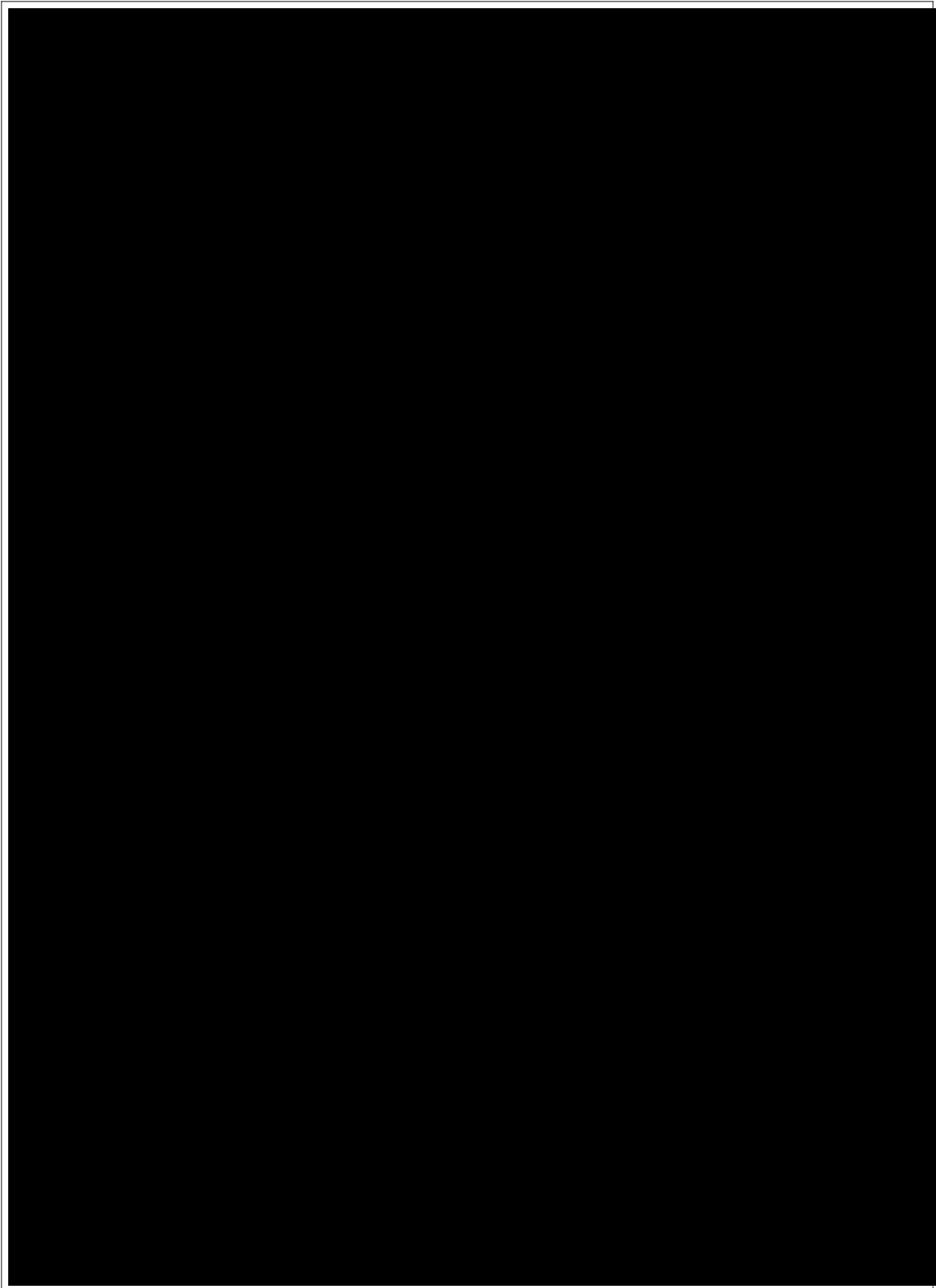
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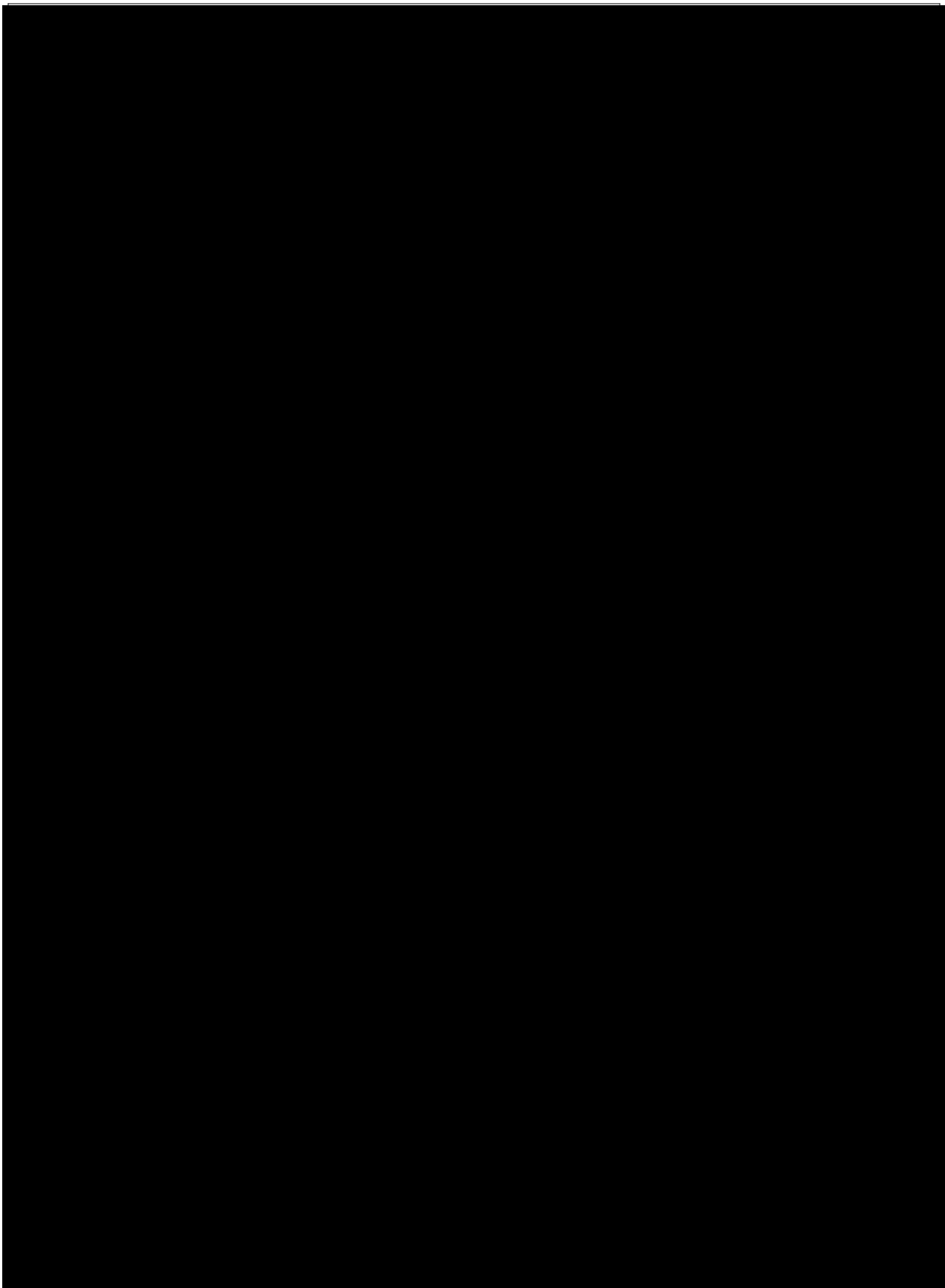
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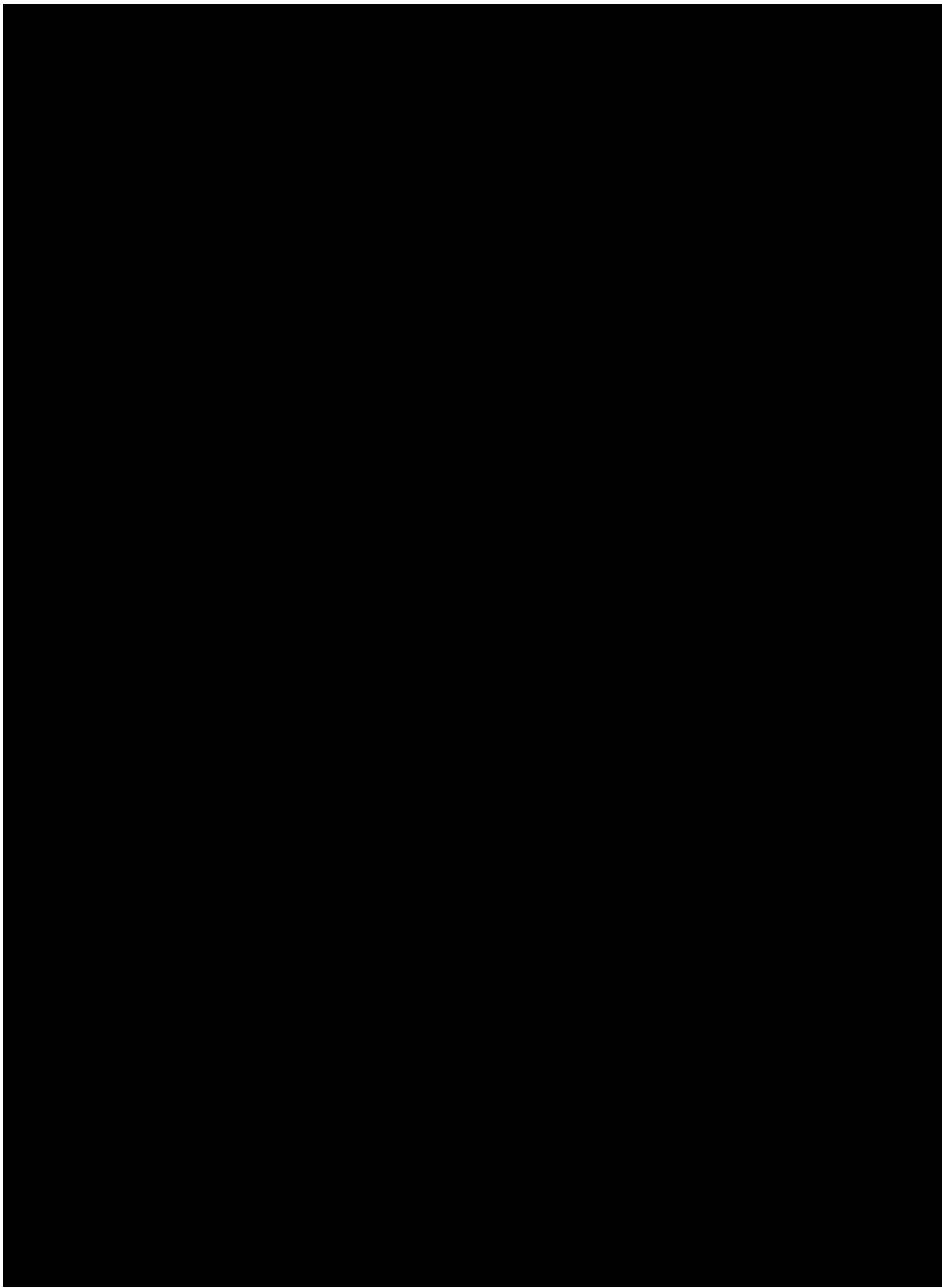
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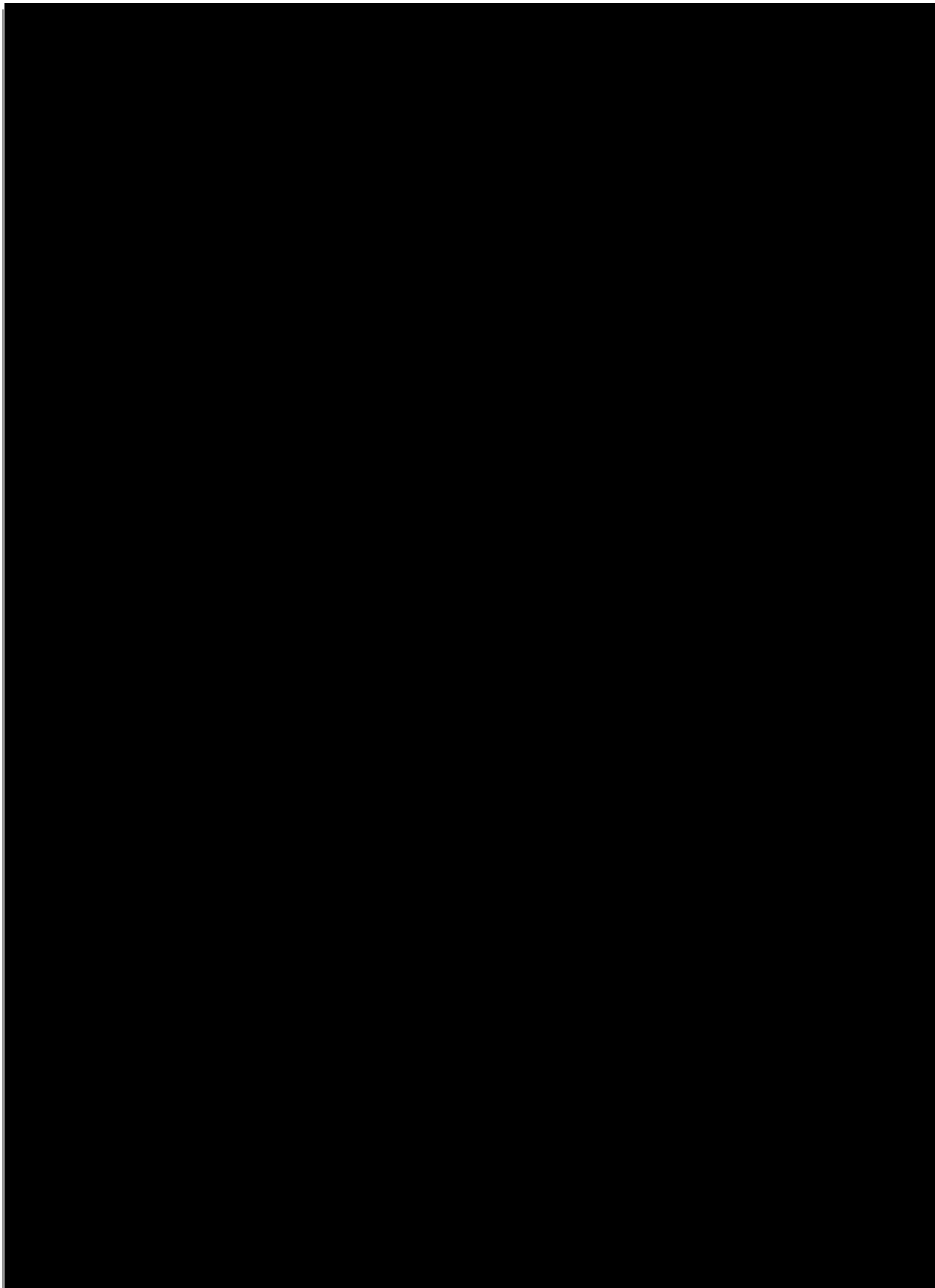
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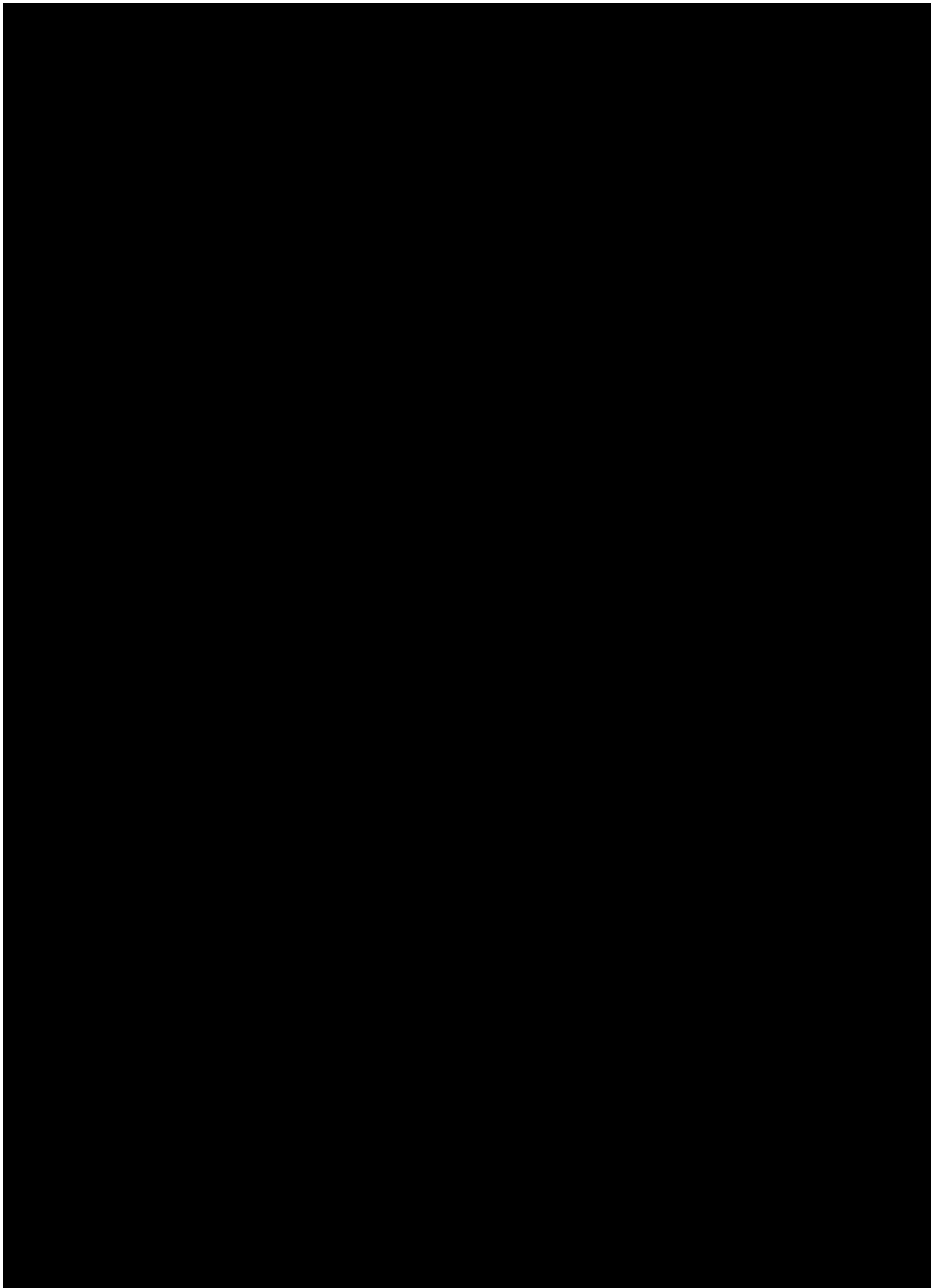
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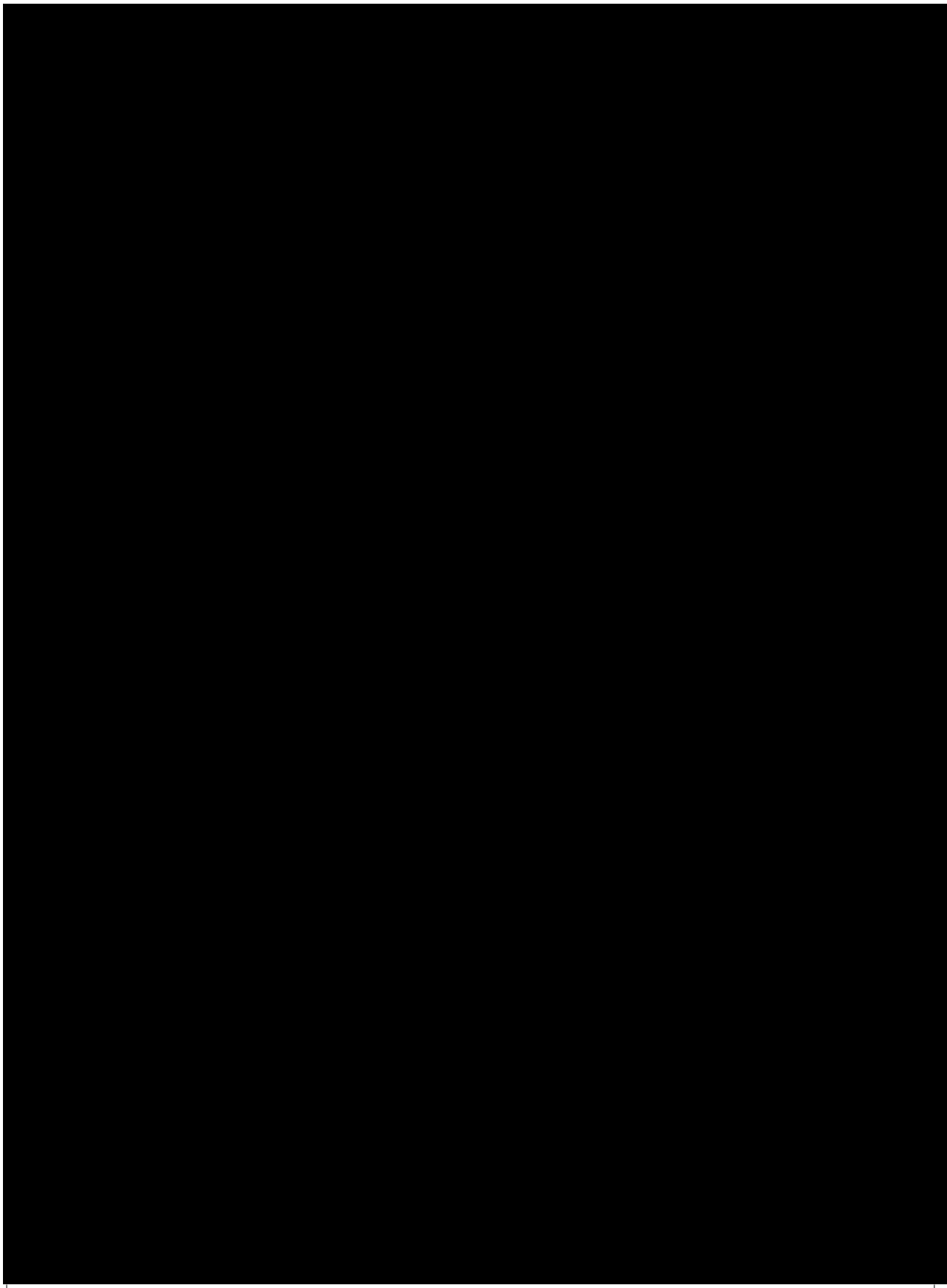
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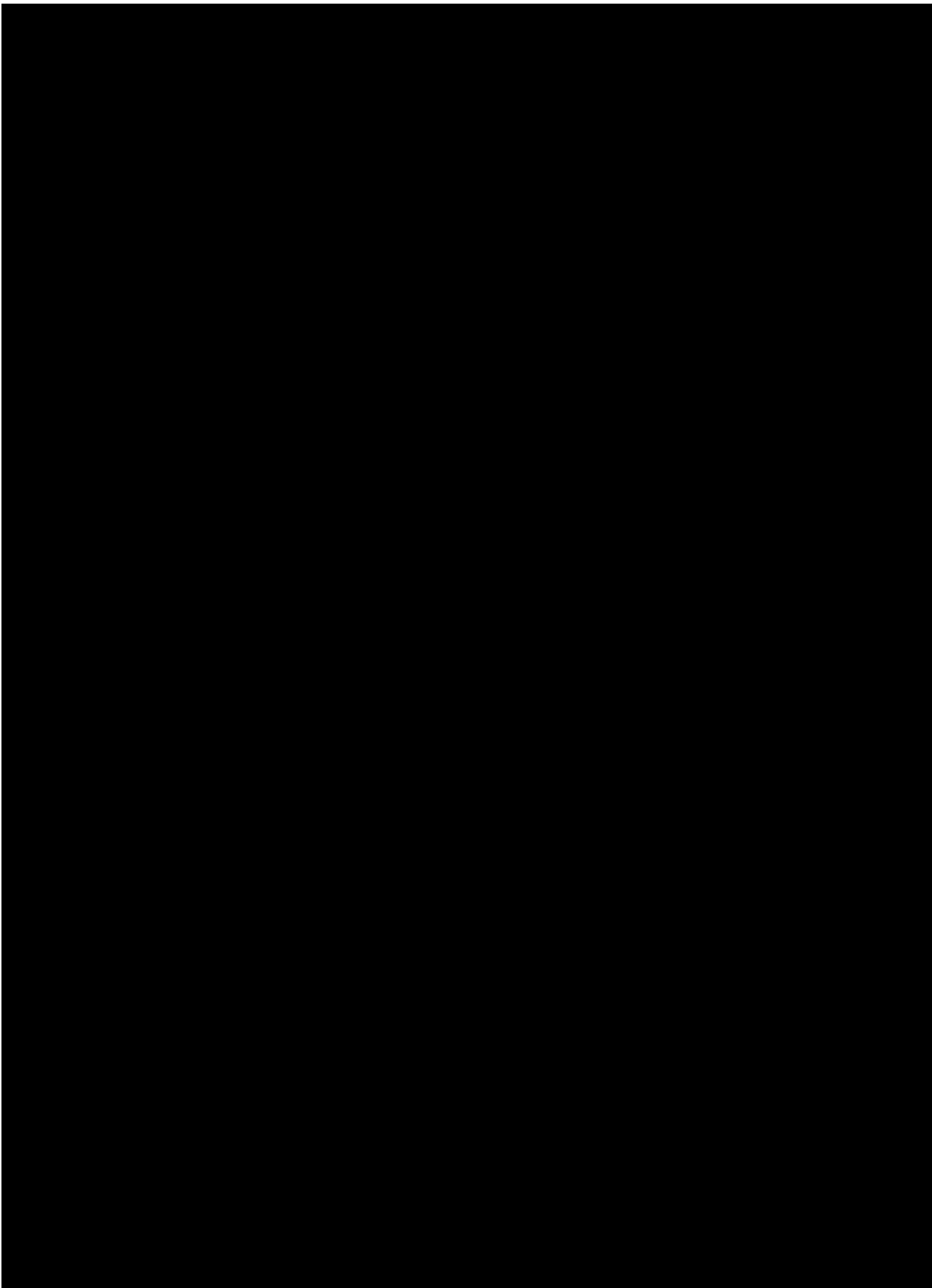
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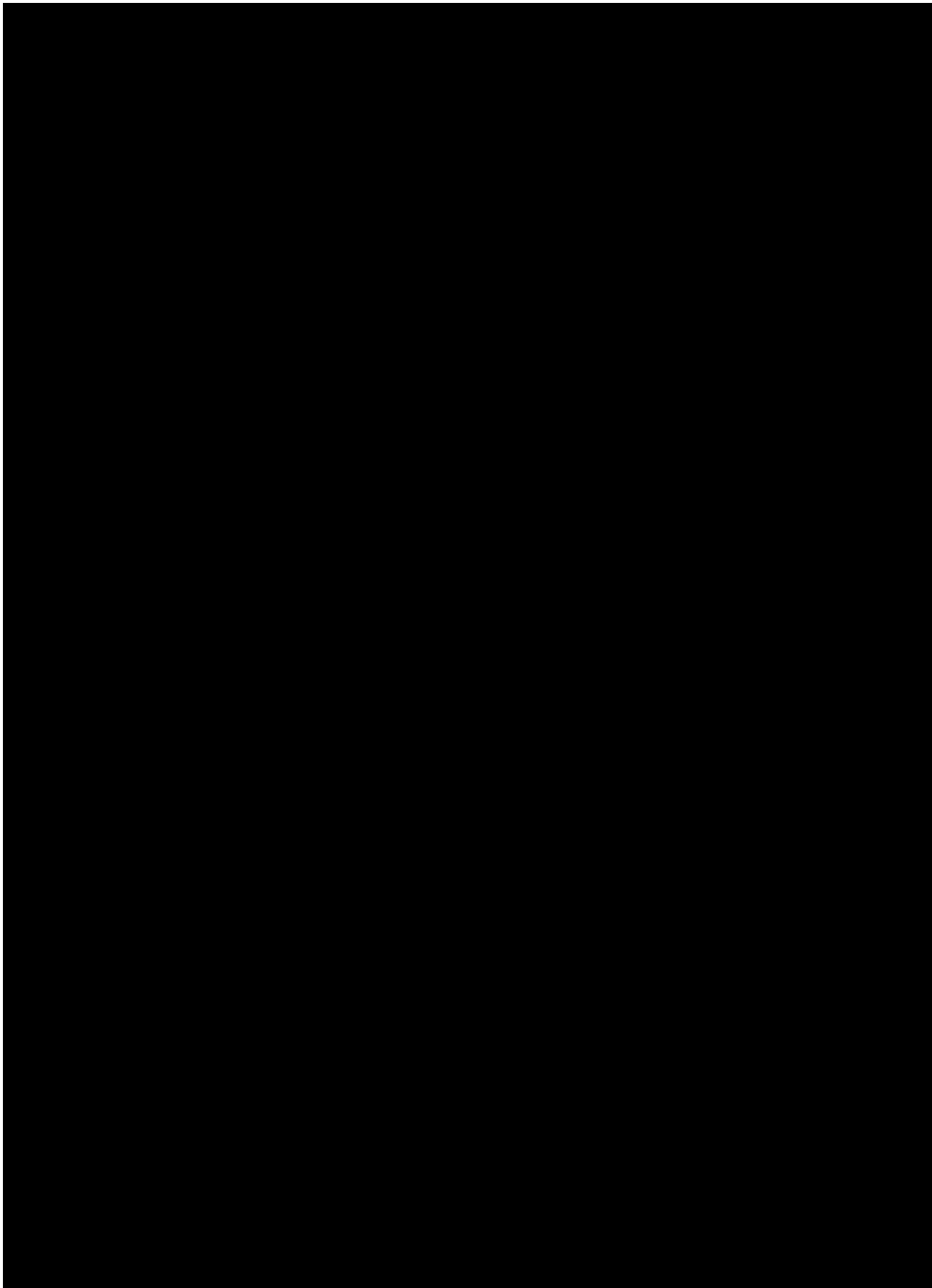
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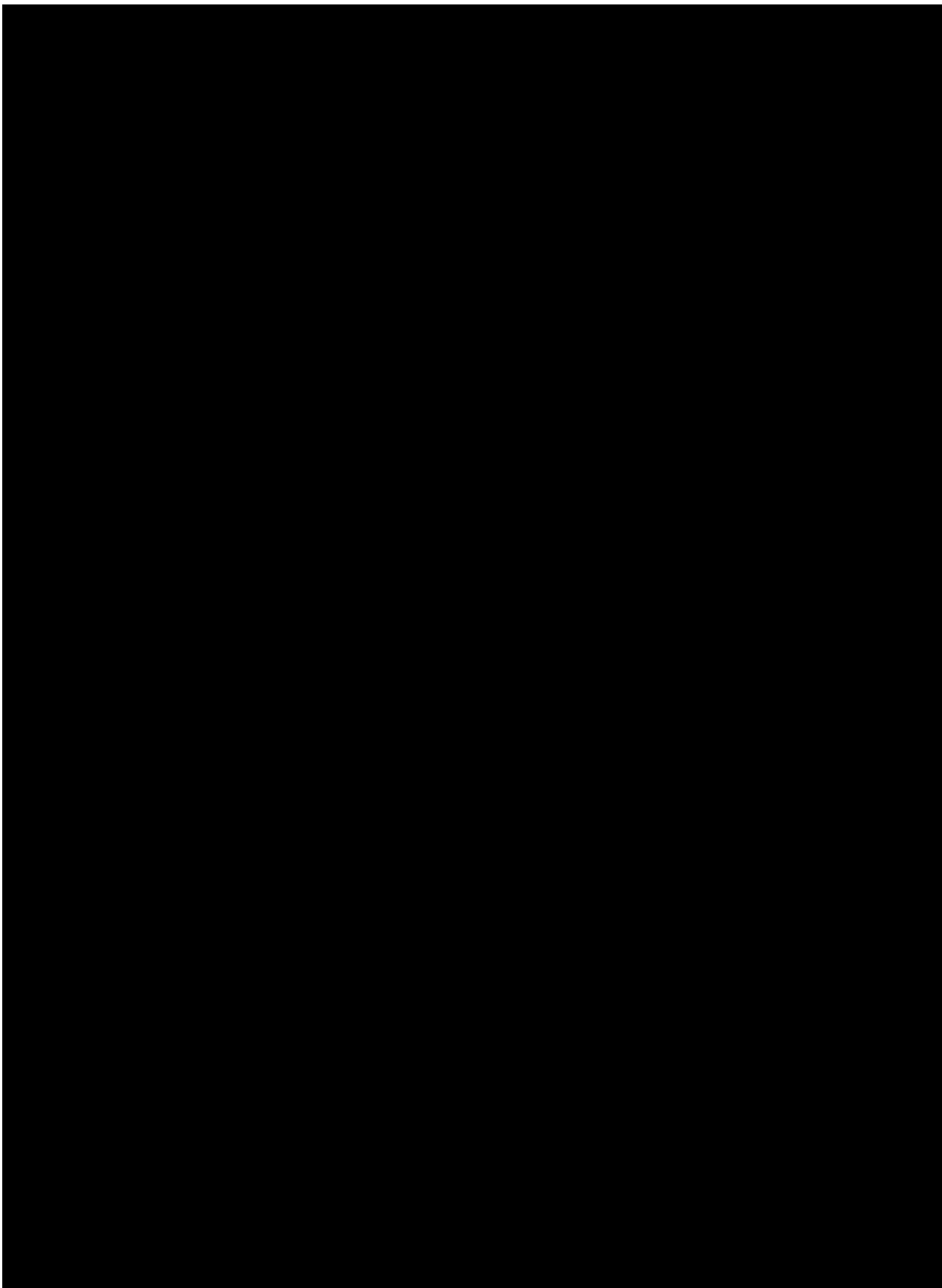
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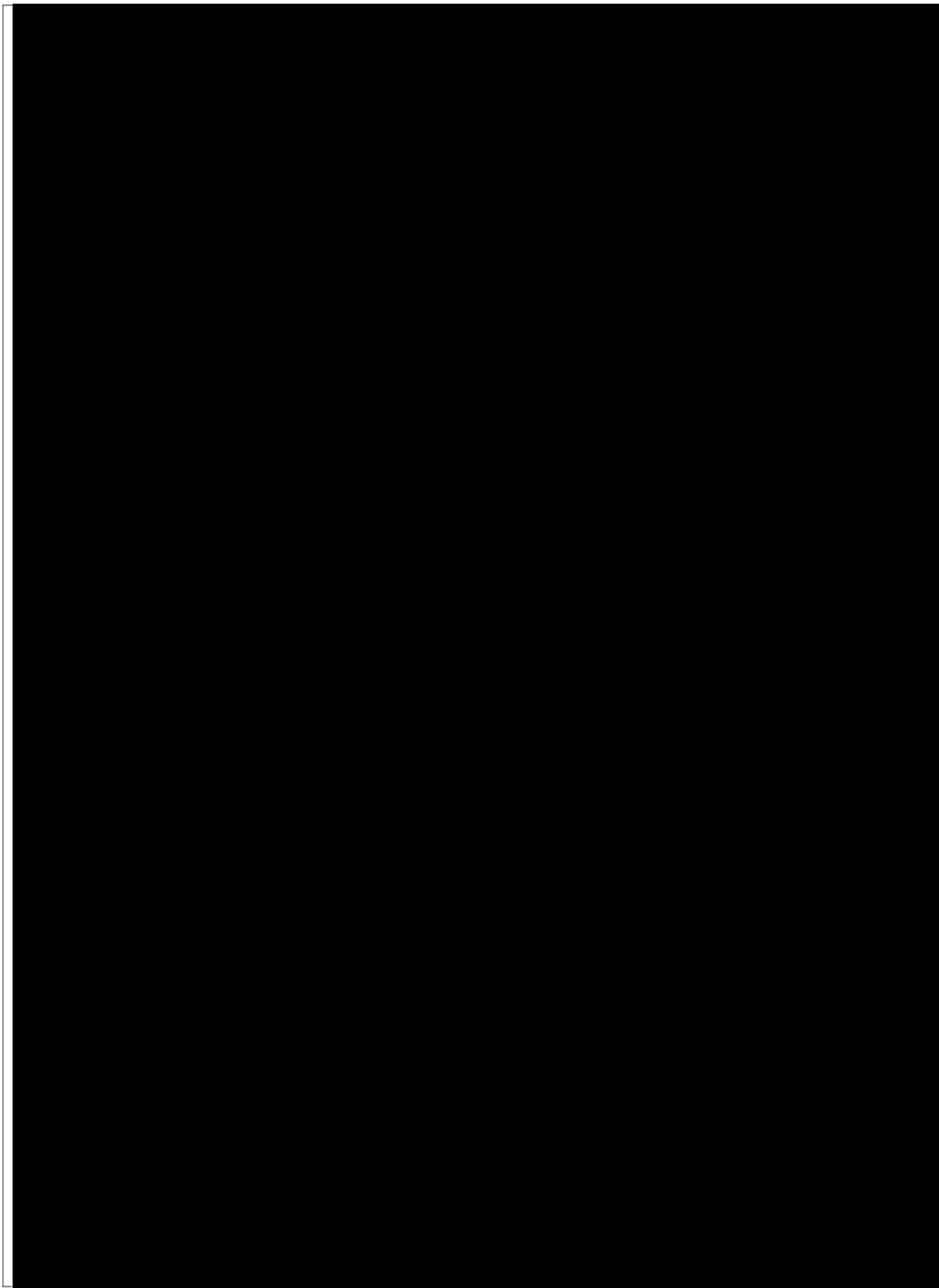
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1 certainly care about.

2 MR. RAVIPUDI: Exhibit 1721.

3 (Whereupon, Meta-Mosseri-41,
4 E-mail(s) re: Time to chat this
5 summer, META3047MDL-050-00010878 -
6 META3047MDL-050-00010879, was marked
7 for identification.)

8 BY MR. RAVIPUDI:

9 Q. So this Exhibit 42, was that?

10 A. That was 40.

11 Q. Exhibit 40 is April 4th, 2017,
12 and let's get to Exhibit 41. This is a
13 July 2017 e-mail.

14 Do you see that?

15 A. Yes.

16 Q. And if you look on page 2,
17 June 27th, 2017, this is an e-mail to you,
18 right?

19 A. On Tuesday, July [sic] 27th?

20 Q. Yes.

21 A. It's an e-mail -- it doesn't
22 say who it's from, but it says it's to me.
23 At the bottom it says Will.

24 Q. Yeah, it's at the very top of
25 page -- or very bottom of page 1.

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1 A. Oh, sorry, [REDACTED] [REDACTED] -- I
2 apologize, [REDACTED].

3 Q. So he reached out to you on
4 June 27th, 2017 and he said: I'm a current
5 data science intern working for the News Feed
6 analytics group, working to try and
7 potentially find addicted Facebook users and
8 figure out if there's ways to help them.

9 Do you see that?

10 A. I do.

11 Q. And he wanted to meet with you
12 for 15 to 30 minutes to talk about that and
13 see what he can do to find addicted users and
14 figure out a solution to help them.

15 Do you see that?

16 A. He says he wants to find 15 to
17 30 minutes to talk about the work you do in
18 your current role and some of your
19 perspectives about managing the experience
20 behind Facebook's most important product.

21 Q. And, of course, he would love
22 any feedback the head of -- the head of
23 Instagram, or soon-to-be head of Instagram
24 would have, right?

25 A. I assume he would appreciate my

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1 feedback.

2 Q. And that's pretty cool. Would
3 you agree?

4 MS. JONES: Objection to the
5 form.

6 You can answer.

7 A. That he reached out? I think
8 it shows initiative.

9 BY MR. RAVIPUDI:

10 Q. Yeah.

11 A. I get a lot of e-mails like
12 this. A lot of people ask for time. I think
13 it's a healthy thing.

14 Q. And, you know, his endeavor of
15 trying to potentially find addicted Facebook
16 users and figure out a way to help them, that
17 is something, just a couple of months ago,
18 you were very interested in, right?

19 A. Sorry. You're saying I was
20 very interested in -- a few months ago, if
21 you're referring to the previous exhibit, I
22 was certainly interested in understanding one
23 of the industry expert's definition of
24 addiction and take on social media. This is
25 pretty different. This is an intern who is

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1 asking for time to chat.

2 Q. To try and potentially find
3 addicted Facebook users and figure out if
4 there's a way to help them.

5 A. I think he asks to talk about
6 my current role and some of my perspectives
7 about managing the experience. He says he's
8 working on finding addicted -- potentially
9 addicted Facebook users and figure out if
10 there are ways to help them.

11 Q. And did you ever meet with him?

12 A. I don't remember. I don't
13 think so.

14 Q. Yeah.

15 It's your testimony still that
16 you care about addicted users on your
17 platform?

18 MS. JONES: Objection to the
19 characterization.

20 A. I care about understanding
21 addiction. I can't meet with every intern
22 that reaches out. There's just,
23 unfortunately, not enough time. I'd love to.

24 But yes, my testimony is it's
25 an issue I care about.

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1 things, and it was sexual and not nudity.

2 BY MR. RAVIPUDI:

3 Q. 13- to 15-year-olds, 19.2%,
4 unwanted nudity, in the metric on the right.

5 Where, in any of your
6 transparency documents, did you share that
7 with the public or parents?

8 MS. JONES: I'm going to object
9 again to form, asked and answered and
10 to the characterization of these
11 documents.

12 You can answer again.

13 A. It's not unwanted nudity.
14 Nudity is short for what you can see on
15 page 5 of your document. It's: Did you say
16 yes to the question have you ever seen nudity
17 or sexual images on Instagram that you didn't
18 want to see?

19 MR. RAVIPUDI: And then if we
20 go to -- why don't we mark as what's
21 1729.2.

22 THE WITNESS: So are we going
23 to another document?

24 MR. RAVIPUDI: Yes, Exhibit 60.
25 (Whereupon, Meta-Mosseri-60,

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1 Instagram Transparency Center, How
2 prevalent were child endangerment
3 violations, was marked for
4 identification.)

5 BY MR. RAVIPUDI:

6 Q. So you see on the left-hand
7 side, we're just going down the bold to
8 different categories. The prior, Exhibit 57,
9 identified adult nudity and sexual activity.
10 Do you see that?

11 A. I do.

12 Q. Child endangerment, nudity and
13 physical abuse and sexual exploitation.
14 Do you see that?

15 A. I do.

16 Q. Can you read at the bottom what
17 information in transparency is provided to
18 the community?

19 A. It says: We are working on
20 estimating prevalence for child endangerment
21 violations. We will continue to expand
22 prevalence measurement to more areas as we
23 confirm accuracy and meaningful data.

24 Q. So no information, correct?

25 A. The challenge here is most of

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1 this problem manifests in messaging where
2 there are strict laws about our ability to
3 look at messages, and in certain cases, also
4 encryption issues to deal with.

5 Q. So no information to the public
6 on that important piece of data, correct?

7 MS. JONES: Objection to the
8 form and to the characterization.

9 You can answer.

10 A. The challenge is messaging has
11 a bunch of rules. There's privacy concerns.
12 A lot of people don't want us reading their
13 messages, and so this is an area where we
14 don't have yet a metric that is -- that we
15 can share, but we would like to come up with
16 something.

17 MR. RAVIPUDI: Okay. Let's go
18 to 1730.

19 THE WITNESS: Just so I know,
20 do you want me to move these back or
21 are we still in the same zone?

22 MR. RAVIPUDI: We're still in
23 the same zone. Exhibit 61.

24 (Whereupon, Meta-Mosseri-61,
25 Instagram Transparency Center, How

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1 prevalent were suicide, self-injury,
2 and eating disorder violations, was
3 marked for identification.)

4 THE WITNESS: Okay. Thank you.

5 BY MR. RAVIPUDI:

6 Q. This is the prevalence of SSI
7 information.

8 Do you see that?

9 A. I do.

10 Q. And the information that is
11 provided on the Transparency Center is?

12 A. That in Q4 2024 the upper limit
13 was 0.05% for violations of our policy for
14 suicide, self-injury and eating disorders on
15 Instagram. This means that out of every
16 10,000 views of content on Instagram, we
17 estimate no more than five of those views
18 contained content that violated the policy.

19 Q. And here it says that the
20 content -- the violating content is very
21 infrequent.

22 Do you see that on the first
23 page?

24 A. It says: Views of violating
25 content that contain suicide, self-injury and

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1 eating disorders are very infrequent.

2 MR. RAVIPUDI: Let's go to
3 Exhibit 59, if you can put that to the
4 side -- side by side, and that page 20
5 again.

6 BY MR. RAVIPUDI:

7 Q. If you go down to self-harm.
8 Do you see that?

9 A. I do.

10 Q. For overall, it's 6.7%.
11 Do you see that?

12 A. I'm looking for the question
13 for self-harm.

14 Q. Fourth from the bottom.

15 A. No, I'm looking for the survey
16 questions.

17 (Document review.)

18 A. Yes. So this question, where
19 it says, overall, 6.7% is the percentage of
20 people in a given week who said that -- hang
21 on just a second. I apologize.

22 Q. What page are you reading from?

23 A. Have you ever seen someone harm
24 themselves or threaten to do so on Instagram?

25 MS. JONES: What page are you

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1 on, Mr. Mosseri?

2 THE WITNESS: I'm looking at
3 what it refers to. So self-harm on
4 the right is shorthand for the
5 self-harm question. I'm looking --

6 MS. JONES: Just what's the
7 page on the upper right-hand corner?

8 THE WITNESS: 5.

9 MS. JONES: Okay. Thank you.

10 THE WITNESS: Sorry, P0063.5.

11 MR. RAVIPUDI: Thank you.

12 BY MR. RAVIPUDI:

13 Q. And 6.7% for overall and 8.4%
14 for 13- to 15-year-olds?

15 A. 8.4% of 13- to 15-year-olds
16 said yes to the question: Have you ever
17 found out that an Instagram -- sorry. Have
18 you ever seen someone harm themselves or
19 threaten to do so on Instagram?

20 Q. Right. Over the last seven
21 days, right? All of this data is for in the
22 last seven days?

23 A. I believe so, though the
24 question implies otherwise. So I'd have
25 to -- that is something odd about how they're

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1 wording the question.

2 Q. Right. And you can look on
3 actually slide -- or page 20, and it says
4 it's over the last seven days.

5 A. It could be when they asked the
6 question over the last seven days as opposed
7 to they changed the text in the question.

8 Either way, it's -- either way,
9 it's about the percentage of people who saw
10 even one thing where someone threatened to
11 hurt themselves, which is a different thing
12 than actually seeing suicide-related content.

13 Q. Seeing someone harm themselves
14 or threaten to do so?

15 A. Yes.

16 Q. Okay. And that's not good,
17 that type of exposure, right?

18 MS. JONES: Objection to the
19 form, compound.

20 A. No. We certainly don't want
21 people to threaten to harm themselves or to
22 connect people with content like that. We
23 take suicide, self-injury and the broader
24 space of self-harm very seriously. We talked
25 already, but I can go into more details on

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1 how we categorize it and try to balance
2 protecting individuals and protecting those
3 who might be vulnerable.

4 BY MR. RAVIPUDI:

5 Q. Where did you, in any Instagram
6 platform or messaging to the public or
7 parents, inform them of these self-harm
8 findings?

9 MS. JONES: Let me object to
10 the form and to the characterization
11 of these documents.

12 A. This is one survey of many. We
13 don't release survey results in general.
14 Self-reported surveys are notoriously
15 problematic for a bunch of reasons that
16 survey scientists can speak to.

17 We focus primarily on
18 prevalence because we think it is the -- not
19 perfect, but the best measure of the actual
20 violating content on the platform.

21 MR. RAVIPUDI: Move to strike
22 everything after "we keep our surveys
23 confidential."

24 BY MR. RAVIPUDI:

25 Q. Why do you keep these surveys

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1 12:31 p.m. PDT)

2 THE VIDEOGRAPHER: The time is
3 12:31. We're back on the record.

4 -----

5 EXAMINATION

6 -----

7 BY MS. CHAN:

8 Q. Good afternoon, Mr. Mosseri.
9 My name is Christina Chan. I'm a senior
10 trial counsel with the Massachusetts Attorney
11 General's Office. Thank you for being here
12 today.

13 A. Good to meet you.

14 Q. Mr. Mosseri, are you familiar
15 with an initiative within the company called
16 Project Daisy?

17 A. There was a project called --
18 code named Daisy that was about potentially
19 hiding like counts.

20 Q. Just to be clear, it was an
21 initiative at Instagram to test hiding like
22 counts on posts; is that correct?

23 A. That's correct.

24 Q. And the intent of Project Daisy
25 was to see if hiding like counts on posts on

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1 Instagram could improve social comparison and
2 overall well-being for users; is that
3 correct?

4 MS. JONES: Let me just object
5 to the form and to the
6 characterization.

7 You can answer.

8 A. There were a couple ideas
9 behind it. The main one, though, is that it
10 would hopefully depressurize the experience.
11 We hear sometimes that people feel that
12 Instagram can feel like a pressurized
13 environment, and we thought maybe having like
14 counts would allow people to focus a little
15 bit less on how many likes they're getting
16 and a little bit more on the content itself.

17 BY MS. CHAN:

18 Q. And the pressurized experience
19 has to do with comparing themselves to
20 others, i.e., social comparison; is that
21 fair?

22 MS. JONES: I'm sorry.
23 Objection to the form.

24 Go ahead.

25 A. I think that is one way. So I

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1 think what -- you could compare how many
2 likes you were getting to somebody else, but
3 even without comparing, you might just be
4 thinking about how many likes you got or what
5 other people saw. So it wasn't necessarily
6 just about social comparison.

7 BY MS. CHAN:

8 Q. Okay. And was it a tool that
9 Instagram was exploring to potentially try to
10 minimize negative experience that users were
11 having on the platform?

12 A. It was not trying to minimize
13 specifically one negative experience. It was
14 more just trying to make the experience more
15 pleasant in general. I was personally pretty
16 excited about it. I talked about it a lot
17 publicly.

18 It turned out that it was very
19 polarizing. Some people really liked it;
20 some people really didn't. And it didn't
21 move any measures of well-being, which we
22 tried to measure, so we ended up making it
23 opt-in.

24 Q. Okay. And when you said it was
25 an attempt to improve the experience for

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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,
7 ADAM S. MOSSERI was duly sworn by me to
8 testify to the truth, the whole truth and
9 nothing but the truth.

10 I DO FURTHER CERTIFY that the
11 foregoing is a verbatim transcript of the
12 testimony as taken stenographically by and
13 before me at the time, place and on the date
14 hereinbefore set forth, to the best of my
15 ability.

16 I DO FURTHER CERTIFY that pursuant
17 to FRCP Rule 30, signature of the witness was
18 not requested by the witness or other party
19 before the conclusion of the deposition.

20 I DO FURTHER CERTIFY that I am
21 neither a relative nor employee nor attorney
22 nor counsel of any of the parties to this
23 action, and that I am neither a relative nor
24 employee of such attorney or counsel, and
25 that I am not financially interested in the

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Dated: March 31, 2025