

AMENDED Exhibit 8

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. 4:22-md-3047-YGR
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.)

Case No. 23-1364-IV)

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF BRIAN BOLAND

APRIL 25, 2025

(Pages 1 - 422)

9:18 a.m. to 7:18 p.m.

Zuckerman Spaeder

2100 L Street, NW, Washington, DC 20037

Reported By: Amanda Blomstrom, RMR, CRR, and
CSR TX #8785/CA #12681/IL #84-3634

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1 MR. JANSSEN: Appreciate that, Andrew.
2 Thank you. Thank you.

3 MR. SNEED: Thank you.

4 BY MR. JANSSEN:

5 Q. Mr. Boland, Exhibit 2, your LinkedIn
6 profile, do you recognize the contents of this, of
7 this document?

8 A. I do.

9 Q. Did you prepare the contents of your
10 LinkedIn profile?

11 A. I did.

12 Q. And my understanding is that when you
13 worked for the Facebook company it was called
14 "Facebook"; is that right?

15 A. That's correct.

16 Q. It's since changed names; is that your
17 understanding?

18 A. That's my understanding.

19 Q. For purposes of today's deposition, if
20 I reference the company as "Facebook" or as "Meta
21 Platforms" at times, is it your understanding -- are
22 you okay if I use those terms interchangeably in

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1 terms of the -- what the company has been called and
2 is called now?

3 MR. SNEED: Object to form.

4 THEW WITNESS: I'm comfortable with you --
5 unless you're specifically asking about one of
6 apps --

7 BY MR. JANSSEN:

8 Q. Understood.

9 A. -- itself, and then if we could clarify,
10 that would be great.

11 Q. You bet. I will do that.

12 Mr. Boland, if I could direct your
13 attention to the -- Page 2 of 5 of your LinkedIn
14 profile. About a third of the way down, it says,
15 "Facebook, 11 years 3 months."

16 Do you see that?

17 A. I do.

18 Q. Is that -- is that the amount of time that
19 you spent working at Facebook?

20 A. Yes, that's accurate.

21 Q. And if you turn or look at Page 3 of 5,
22 toward the bottom, it says, "Director, Product

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1 Marketing, September 2009."

2 Do you see that?

3 A. I do.

4 Q. Is that when you began working at
5 Facebook?

6 A. Yeah, that's what I started at the
7 company.

8 Q. And then if you look again back at Page 2
9 of 5, at that top position, right under "Facebook,
10 11 years 3 months," it says, "November 2020."

11 Is that when you finished your employment
12 with Facebook?

13 A. That's correct.

14 Q. And if I could direct your attention back
15 to that -- let me ask you, Mr. Boland: When you
16 first joined Facebook, what were your goals with
17 joining the company?

18 MR. SNEED: Object to form.

19 THE WITNESS: When I joined Facebook in
20 2009, it was, well, an exciting career opportunity;
21 so it's the ability to move from what I had done at
22 Microsoft to build something new and something

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1 smaller that was a -- more of a startup at the time.
2 And was really excited about the mission of the
3 company. It was something that, it felt like, from
4 walking in the door, that people really had a focus
5 on a mission, and that was -- that was really
6 appealing.

7 Q. And what was the mission of the company
8 that you found attractive?

9 A. It was this idea of making the more -- the
10 world more open and connected. So that you could
11 actually create a set of technologies that enabled
12 people to get to know each other better and build
13 bonds that spanned groups that they wouldn't normally
14 be in and really have that vision of connecting for
15 good, connecting to actually make people more
16 positively connected, rather than divided.

17 Q. Directing your attention to Page 3 of 5 of
18 your Exhibit 2 LinkedIn profile. Again, starting
19 with that Director of Product, Marketing position.
20 You held that position from September 2009 through
21 June 2013; is that correct?

22 A. That is correct.

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1 Q. And what did you -- what were your
2 roles and -- what was your role and what was your
3 responsibilities in that first position you had with
4 the company?

5 A. That first phase was focused on building
6 the ads products at Facebook, moving from kind of the
7 initial fumbling that the company had done in ads to
8 something that was a more robust advertising business
9 and set of services.

10 Q. What are ads products that you -- that you
11 referenced?

12 A. It was all of Facebook's auction-driven
13 ads products, and eventually, towards the end, the
14 brand ad products. So the idea that an advertiser
15 could show an ad on Facebook to anybody to reach them
16 for the purpose of creating value for their business.

17 One of the things that we really focused
18 on was being very principled in what we were
19 building, and advertiser value was a core thing that
20 we wanted to build towards. That it wasn't just
21 about making money, it wasn't just about showing ads
22 to somebody. It was about, how do you create value

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1 for a business who is advertising on Facebook?

2 Q. Did people report to you in your position
3 as Director of Product Marketing?

4 A. Initially, no, but eventually I had a
5 team.

6 Q. Okay. How large was that team at the end?

7 A. I don't recall the exact number, but I
8 think it was around ten.

9 Q. And to whom did you report when you were
10 in the role of Director of Product Marketing, if you
11 recall?

12 A. Yeah. Initially it was [REDACTED], and
13 then it was eventually David Fischer.

14 Q. And then if you look above that position,
15 it lists another position, "VP Ads Product Marketing
16 and Atlas."

17 Do you see that?

18 A. I do.

19 Q. And you held that position from June 2013
20 to October 2014.

21 Is that accurate?

22 A. That is correct.

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1 Q. Was that a promotion from your position as
2 Director, Product Marketing?

3 A. Yes.

4 Q. And you list as the description for that
5 position as, "Continued to lead and expand Facebook's
6 ads product" offering -- "offerings resulting in
7 multiple billions in revenue growth."

8 Do you see that?

9 A. I do.

10 Q. In this time frame, Mr. Boland, was
11 Facebook's ads products offering one of the largest
12 sources of revenue for the Facebook company?

13 MR. GOLDFARB: Objection to form.

14 MR. SNEED: Object to form.

15 THE WITNESS: Yes, it was.

16 BY MR. JANSSEN:

17 Q. Was it the largest source of revenue for
18 the Facebook company?

19 MR. SNEED: Object to form.

20 THE WITNESS: It was.

21 BY MR. JANSSEN:

22 Q. And then, if you look above that second

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1 position of VP ads -- well, let me pause there and
2 just go back for a second.

3 Throughout your time at the Facebook
4 company, was the company's revenue from its ads
5 product offerings the largest source of revenue for
6 the company?

7 A. It was.

8 Q. Looking above to the next position you
9 had, "VP Advertising Technology," you held that
10 position from October 2014 to October 2016.

11 Is that accurate?

12 A. That's accurate.

13 Q. Was that another promotion from your last
14 position at Facebook?

15 A. Call it more of a reorganization of
16 responsibilities rather than a promotion.

17 Q. And what were your -- or, what did you do
18 as VP of Advertising Technology?

19 A. Over the course of 2014, 2015, we had
20 acquired some companies in Atlas and LiveRail and had
21 had aspirations to build a competitive product to
22 Google's advertising technology suite. So it was a

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1 pretty major initiative for us to try to see if we
2 could -- could create something that would provide
3 choice in the market, and a different view on how
4 advertising could work.

5 And so that was -- the focus was on, we
6 had a robust ads business at Facebook, how do we
7 shift my attention to focus on this competitive
8 product.

9 Q. While working at Facebook in this time
10 period, which of Facebook's applications did your
11 work relate to?

12 A. The -- yeah, the ad system would have
13 powered ads on Facebook and on Instagram.

14 Q. And then directing your attention now to
15 Page 2 of 5 of your LinkedIn profile. It lists your
16 next position as "VP Publisher Solutions." And that
17 you held that position from October 2016 through
18 January 2018.

19 Is that accurate?

20 A. That's correct.

21 Q. And was this position at VP -- as VP
22 Publisher Solutions, was that a promotion from your

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1 last position?

2 A. Again, I considered it another phase of
3 that organizational structure we were working on.

4 Q. Understood.

5 What did you do in your role as VP
6 Publisher Solutions?

7 A. In that role, we had made a decision to --
8 we realized that we weren't going to be successful
9 creating a unified double-click-style ad product at
10 Facebook, and so we decided to split off different
11 components of the advertising technology business and
12 embed them in their core parts of the business.

13 So the main advertiser parts moved over to
14 the Ads Team, and then, in this role, I was focused
15 on building our Ads network; so how you could expand
16 Facebook's ad offering off of Facebook.

17 Q. The last part you referenced, offering
18 the ad product off of Facebook, is that Facebook's
19 Audience Network?

20 A. That's correct.

21 Q. And could you just provide a brief
22 description of what that is, Facebook's Audience

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1 Network?

2 A. The idea behind Facebook's Audience
3 Network was that we know that advertisers -- because
4 we got really, really good at understanding how to
5 create value for advertisers, we realized that we
6 could provide those same set of services off of
7 Facebook and other apps and other experiences.

8 And the Audience Network was designed to
9 show ads that were not being shown on Facebook or
10 on Instagram or Facebook properties into other
11 third-party apps and experiences with the goal of
12 creating that same advertiser value just in -- in
13 different locations.

14 Q. To whom did you report as VP Publisher
15 Solutions?

16 A. That was to Dan Rose.

17 Q. And did you have a team that you
18 supervised in that role?

19 A. I did.

20 Q. How many people did you supervise?

21 A. I think around a hundred, but that's --
22 take that as a ballpark.

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1 Q. Understood.

2 Your final position at Facebook is listed
3 as "VP Partnerships Product Marketing, Partner
4 Engineering, Marketing, Strategic Operations, &
5 Analytics."

6 Did I read that correctly?

7 A. You did.

8 Q. And that you held that position for
9 2 years 11 months, from January 2018 to
10 November 2020.

11 Is that accurate?

12 A. That's correct.

13 Q. Was that a promotion from your last
14 position of VP Publisher Solutions?

15 A. Yes.

16 Q. And to whom did you report as -- if I just
17 call it the "last position," VP Partnerships Product
18 Marketing?

19 A. Some mix of Dan Rose and then Marne
20 Levine. I don't -- there was a transition from
21 Dan Rose to Marne, and I honestly can't remember what
22 year that was.

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1 Q. At some point while you held this last
2 role was when you transferred to have Marne Levine
3 supervising you or --

4 A. Yeah, it was either that or the previous
5 role. It's just, time is a little bit of a blur.

6 Q. Understood.

7 Did you have a team?

8 A. I did.

9 Q. And how large was that team in this last
10 role at Facebook?

11 A. It was about a 500-person team.

12 Q. And what did you do as VP Partnerships
13 Product Marketing?

14 A. The full, the -- you want all the kind of
15 broad brushstrokes of the --

16 Q. That would be great.

17 A. Okay. Product Marketing -- so for this
18 group, the context is actually helpful. When I was
19 in the ads business, my job was focused on
20 advertisers specifically. When we were in the
21 Partnerships Team, you can think about that working
22 on a broad array of third parties who partner with

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1 Facebook and how we build products and services and
2 sales teams to support them and to bring them on to
3 Facebook products broadly.

4 Product Marketing is focused on
5 understanding customers and their needs.

6 Partner Engineering are engineers who
7 actually work internally and externally to build
8 last-mile solutions for customers.

9 The Marketing Team is marketing; telling
10 the story of the broad array of businesses that we've
11 worked on.

12 Strategic Operations is the business
13 planning function, so helping internal teams plan for
14 headcount, plan for the ways that they should develop
15 processes to reach these customers.

16 And Analytics is a data analysis group who
17 understands the data that we need to run the business
18 across those products, which would have included
19 Facebook's Watch; Video that's in the app; News;
20 Games; Groups and Group Admins, which is a product on
21 Facebook; Facebook developer solutions; the work
22 we're doing on Internet Connectivity; Workplace,

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1 which is the work version of Facebook, so Facebook
2 for the office; Marketplace, which was the emerging
3 shopping platform; Payments, which help people do
4 payments through the Facebook platform; and then
5 Audience Network as a product, so will remain a part
6 of that purview.

7 Q. And this position, VP Partnerships Product
8 Marketing, that was the -- the last position you held
9 at the company?

10 A. That was.

11 Q. When did you resign from Facebook?

12 A. In June or July of 2020.

13 Q. And when was your -- your final day
14 with -- with the company?

15 A. It was in November. I can't remember the
16 exact day.

17 Q. So you resigned summer of 2020, but stayed
18 on through November, sometime in that -- in there?

19 MR. SNEED: Object to form.

20 THE WITNESS: That's correct.

21 BY MR. JANSSEN:

22 Q. Why is it that you decided to resign from

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1 Facebook, Mr. Boland?

2 A. I came to disagree with decisions the
3 company was making around investments to understand
4 whether the platform was harmful to users on the
5 platform.

6 Q. In your roles at Facebook, did you have
7 the opportunity to work with any senior executives at
8 Facebook?

9 A. Yes.

10 Q. Did you ever have the opportunity to work
11 with Mr. Zuckerberg while you were at Facebook?

12 A. I did.

13 Q. In what ways did you work with
14 Mr. Zuckerberg at Facebook?

15 A. We, as a common course of business, would
16 do product reviews with Mark or would do annual
17 reviews with Mark and the M-Team leadership team, and
18 so it was in a variety of product-specific reviews or
19 business line reviews in the annual review process,
20 depends on the acquisition of Atlas, LiveRail, so
21 regular course of business.

22 Q. On average, how many times a year might

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1 Q. Do you have any reason to believe that
2 what's printed off as Exhibit 5 is any different than
3 what's the live PDF on the Congress.gov website?

4 MR. SNEED: Object to form; foundation.

5 THE WITNESS: No reason to think that it
6 would be otherwise.

7 BY MR. JANSSEN:

8 Q. Thank you. You can set aside Exhibit 4,
9 the single-page document.

10 And I just wanted to ask you some
11 questions about your prepared written statement --

12 A. Okay.

13 Q. -- starting at 110.

14 The document begins, says, "Testimony of
15 Brian Thomas Boland."

16 That's you, correct?

17 A. That is correct.

18 Q. And a little below that it says, "Before
19 the United States Senate Committee on Homeland
20 Security and Governmental Affairs on 'Social Media's
21 Impact on Homeland Security: Part I.'"

22 Did I read that correctly?

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1 A. You did.

2 Q. And then it says you submitted this on
3 September 12th, 2022.

4 Is that accurate?

5 A. That is accurate.

6 Q. If I could direct your attention to the
7 second paragraph of your prepared written statement
8 and the last sentence of that paragraph, it says,
9 "During my tenure at the company ... worked with the
10 most senior executives at the company and was deeply
11 embedded in the product development process."

12 Did I read that correctly?

13 A. You did.

14 Q. Now, earlier in your testimony you told
15 us some about your work with Mr. Zuckerberg and
16 Ms. Sandberg. Are there other senior executives at
17 the Facebook company with whom you worked closely
18 while -- during your time at the company?

19 A. A lot of different executives and VP level
20 product and technical executives.

21 Q. Is there any way to, I guess ballpark
22 the -- I guess the number of people that you would

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1 put in that category of senior executives with whom
2 you worked at the company?

3 MR. GOLDFARB: Objection to form.

4 MR. SNEED: Object to form.

5 THE WITNESS: Hard to ballpark because
6 there -- there's a lot.

7 BY MR. JANSSEN:

8 Q. Understood.

9 A. I would say for -- surely for any of the
10 product areas that I had previously mentioned across
11 all those different areas, I would have worked with
12 the leaders on those products at that level, as well
13 as had interactions with senior-level executives on
14 other business areas as well. So pretty broad
15 coverage of people that I worked directly with and
16 people that I would converse with or ...

17 Q. In the next paragraph you write, "In
18 the last two years of my time at the company, the
19 CrowdTangle team and product was a part of my
20 organization, CrowdTangle is a tool that provides
21 limited, albeit industry leading, transparency into
22 public News Feed content on Facebook. What finally

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1 convinced me that it was time to leave was that
2 despite growing evidence that the News Feed may be
3 causing harm globally, the focus on and investments
4 in safety remained small and siloed."

5 Did I read that correctly?

6 A. You did.

7 Q. So that paragraph references the
8 CrowdTangle tool. Can you please explain what the
9 CrowdTangle tool is for the jury.

10 A. CrowdTangle -- which is no longer in
11 existence, Meta has shut it down -- CrowdTangle was a
12 product that was acquired by Facebook that provided
13 external data on public content that was appearing in
14 the News Feed so that publishers or activists or
15 journalists, generally-interested parties in the
16 public, could gain an understanding of the types of
17 content that were appearing on Facebook in the
18 News Feed and gain an understanding of the type of
19 engagement that that content would have.

20 Q. And what could either journalists or
21 the public or researchers learn from using the
22 CrowdTangle tool?

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1 MR. GOLDFARB: Objection to form.

2 THE WITNESS: There were some remarkable
3 ways that the public used the CrowdTangle product.
4 Activists around the world were able to spot trends
5 in harmful content, whether that was divisive content
6 around groups that could lead to harmful real-world
7 violence and get ahead of staving that off, you could
8 understand what content was going viral on the
9 platform and see trends of the types of -- of content
10 that may be harmful to communities.

11 It can be used to understand patterns,
12 and some patterns were covered by journalists, like
13 Kevin Roose from The New York Times looked at a
14 specific political leaning of the content that he saw
15 on the platform.

16 So it was a tool that enabled those
17 interested parties to look after their audiences and
18 find out what was happening on Facebook for the
19 communities that they cared about.

20 BY MR. JANSSEN:

21 Q. The last part of this paragraph of your
22 prepared written statement says that "the focus on

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1 and investments in safety remained small and siloed."

2 What did you mean by what you wrote there,
3 that "investments in safety remained small and
4 siloed"?

5 A. In my role at the company, I had
6 visibility into the way that financial and headcount
7 investments were placed across different teams at the
8 company. And I had seen a couple of trends that
9 concerned me; one, that the amount of headcount --
10 and these are employees, so "headcount" refers to who
11 you can hire in the future, how big your team can
12 grow -- wasn't being allocated towards measures
13 focused on safety. That previously, for things that
14 were of critical importance to the company, we were
15 signaled that those areas of responsibility were
16 everyone's responsibility. For example, when we had
17 to grow our ads business, every team received a
18 goal around advertising. When we changed to be a
19 mobile-first company, every team was given a goal of
20 requiring that they show mobile designs in their
21 work.

22 We didn't have teams -- we didn't have

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1 requirements for teams to show safety and trust
2 metrics or responsibilities in their own products,
3 rather, it was a separate team that was responsible
4 for election integrity, those types of trust and
5 safety issues. It wasn't a mainline responsibility.

6 So those were the concerns that I had.

7 Q. You noted that you saw that headcount
8 was not being allocated to -- to safety issues. In
9 what time frame did you begin noticing that that
10 allocation was effectively not occurring?

11 A. I'd say in the last two years was the
12 greatest visibility that I had to how headcount was
13 more broadly allocated. And, as I was looking to
14 leave, I was advocating for growth in headcount in
15 research specifically, that I was not able to
16 convince others of or get allocated.

17 Q. So this was in the 2018, 2019, 2020
18 period, or thereabouts, that you saw this issue of --
19 of lack of allocation to safety?

20 A. Yes. And 2020 was probably when I was
21 most vocal with peers across the organization on the
22 necessity that they allocate their own headcount

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1 towards research of their own products.

2 Q. Who were you conveying that to and urging
3 them to allocate headcount towards safety?

4 A. Two -- two real forums. One, there is an
5 all-vice-presidents group at the company, where I
6 posted in the group a -- we communicate a lot through
7 posts at the company and through content on the
8 workplace platform, and I posted to the leaders, all
9 of the vice presidents in the company, that we had an
10 opportunity to better understand our products and to
11 better understand the impacts of our products on the
12 world; and that each leader could take their own
13 accountability to assign headcount to those types of
14 research product -- projects. I advocated with
15 News Feed product leaders in particular, with
16 John Hagemann and Fidji Simo, to better study what
17 was happening on our News Feed products.

18 And, as I resigned, I had offered to
19 stay on at the company if I was allowed to lead the
20 research and public data and CrowdTangle expansion to
21 build up teams to truly understand what was happening
22 on the platform, and I advocated that directly with

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1 Chris Cox and Sheryl Sandberg and Mark Zuckerberg.

2 Q. Let me ask you a few questions about that.

3 That post that you sent out to all VPs, do
4 you recall the time frame that that went out?

5 A. Sometime in 2020, but I can't remember
6 when.

7 Q. About to how many people would you have
8 sent that post?

9 A. I believe there were probably a couple
10 hundred VPs at the time who all would have had it
11 show up in the -- that group, which was a group that
12 people tended to pay attention to.

13 Q. And what response did you get to your post
14 urging them to take accountability for their projects
15 and enhance safety?

16 MR. GOLDFARB: Objection to form.

17 MR. SNEED: Objection to form.

18 THE WITNESS: I had some people outside of
19 the post tell me that they thought it was a good call
20 to action, but that they felt that they didn't have
21 as much freedom to allocate headcount to something
22 like that without it being a broader mandate.

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1 BY MR. JANSSEN:

2 Q. A broader mandate from whom?

3 A. From one of the most senior leaders,
4 Mark Zuckerberg or Sheryl or, you know, their group
5 area lead, like a Chris Cox or an Andrew Bosworth.

6 Q. Did a call to action or mandate ever come
7 from anyone in that group?

8 MR. SNEED: Object to form.

9 THE WITNESS: I never saw one.

10 BY MR. JANSSEN:

11 Q. And you said -- you referenced that people
12 approached you outside the post. Did I -- did I hear
13 that correctly?

14 A. That is correct.

15 Q. What do you mean by "outside the post"?

16 A. Just through chat or through verbally
17 communicating it to me.

18 Q. Effectively taking the conversation
19 one-on-one as opposed to in the VP group --

20 A. That --

21 Q. -- post?

22 A. -- that is correct.

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1 Q. And then you reference that you offered to
2 stay on with the company past your resignation if you
3 could head up the CrowdTangle effort. Is that -- is
4 that a correct understanding?

5 A. It is partially. It is three specific
6 ideas that I had laid out.

7 One, we had an external research
8 partnerships team that, through that budgeting
9 process, that headcount process that year, didn't
10 receive meaningful investment. And I felt that
11 external research partnerships were critical to
12 understanding what was happening on the platform.
13 And I offered to both expand and lead so that it was
14 a robust program.

15 Two, over the last year at the company, I
16 had spent time in the internal user research groups,
17 internal Facebook groups, to understand the types of
18 research that researchers were doing. And it seemed
19 extremely promising for our researchers to spend more
20 time understanding how Facebook, the product, was
21 impacting the people who used Facebook. And I felt
22 that leading a team to build up that expertise would

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1 be extremely impactful in a positive sense.

2 And then the third is that, while research
3 partnerships can enable researchers to have access to
4 more sensitive information, that we still needed a
5 public tool that would enable more people to have
6 oversight, and, frankly, contribute their opinions,
7 their expertise to this global platform. And that
8 was what CrowdTangle would have been able to do.

9 Q. And you've referenced that group that was
10 working to better understand Facebook's impact on its
11 users. Was that group studying both good and bad
12 impacts of Facebook on its users?

13 MR. SNEED: Object to form and foundation.

14 THEW WITNESS: I saw work from that team
15 that looked at the potentially harmful uses or the
16 potentially harmful outcomes that could happen on the
17 platform.

18 BY MR. JANSSEN:

19 Q. And what was the response from senior
20 leadership as to your proposal to focus on and head
21 up those -- those three things that you just
22 described?

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1 A. They said that -- that there was a mix.
2 Some said that we just weren't going to be able to
3 invest and focus on that at the time, and others said
4 that I was just fundamentally wrong in my concerns.

5 Q. For the latter part, the -- the folks who
6 said that you were fundamentally wrong about what you
7 sought to pursue, who -- who had that opinion?

8 A. Andrew Bosworth was very firm that I was
9 wrong.

10 Q. Anyone else?

11 A. He was the most vocal in believing that I
12 had unfounded concerns.

13 Q. Mr. Boland, if I could now direct your
14 attention to the next paragraph in your prepared
15 written statement. Actually, back up.

16 What role did Mr. Bosworth have at the
17 company at the time that you were engaging with him
18 on this issue?

19 A. At the time I believe he was the head of
20 Reality Labs, but I can't be certain.

21 Q. And what is Reality Labs?

22 A. It is Facebook's Metaverse and glasses,

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1 virtual and augmented reality products.

2 Q. The next paragraph of your prepared
3 written statement says, "The documents released by
4 Frances Haugen, the Facebook whistleblower who last
5 fall testified in Congress, highlight issues around
6 polarization globally and the power of Facebook to
7 lead people down a path to more extreme beliefs.
8 These papers demonstrate thoughtful, well researched
9 documentation of the harms that greatly concerned me.
10 This research was done by highly skilled Facebook
11 employees - experts in their field - and was
12 extensive."

13 Did I read that correctly?

14 A. You did.

15 Q. And in the second sentence of that
16 paragraph, you reference "the harms that greatly
17 concerned" you.

18 Can you please describe what those harms
19 were, Mr. Boland?

20 A. I had become concerned, primarily due to
21 my -- the fact that CrowdTangle reported to me and I
22 started to see more and more of the data, actual data

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1 from CrowdTangle, that the Facebook News Feed was
2 likely creating division between people. There was a
3 lot of focus after 2016 on a very specific type of
4 division, which was around political polarization.
5 But the reality is that there are a lot of other ways
6 people can be divided against each other, whether
7 that's based on race, whether that's based on
8 immigration status, whether that's based on religion,
9 or any of the other myriad reasons that people could
10 be divided. I started to feel like there was a
11 preponderance of divisive content in the News Feed,
12 and that we were large -- we were likely to be
13 influencing people to hate others around them.

14 You have to keep in mind that for the
15 majority of my time at the company I helped to build
16 an advertising system that provably, provably, could
17 change the way that you feel about a brand of
18 toothpaste, or any other product. The market and
19 advertiser spend is based purely on return on
20 investment. Did you sell more of their products?

21 The ads that are in the News Feed are just
22 like the other content in the News Feed. And so if

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1 you could change the way someone felt about
2 toothpaste, then you could change the way that other
3 people felt about other people. And that concern,
4 that we saw red flags but didn't deeply understand
5 whether that powerful News Feed was changing the way
6 that people felt, were the types of harms that I was
7 most concerned about.

8 Q. Are you aware that when Ms. Haugen
9 testified to Congress, that she also testified to
10 issues of mental health harms to kids relating to
11 Instagram use?

12 MR. GOLDFARB: Objection to form --

13 MR. SNEED: Objection to form.

14 MR. GOLDFARB: -- foundation.

15 THE WITNESS: I was aware of her
16 testimony, and I was also aware of the articles, and
17 saw that that was one of the topics that she covered.
18 BY MR. JANSSEN:

19 Q. Was that, that harm to kids from Instagram
20 use, was that a harm or an issue that concerned you
21 during your time at the company?

22 MR. SNEED: Object to form.

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1 that at a break.

2 THE WITNESS: I have not signed it yet.

3 If we could --

4 MR. GOLDFARB: I can -- I can print -- I
5 can print one out --

6 MR. SNEED: How about we go off the record
7 for a moment here and address issues around the
8 protective order.

9 MR. JANSSEN: Okay.

10 THE VIDEOGRAPHER: The time is 10:47 a.m.
11 We are now off the record.

12 (Recess taken.)

13 THE VIDEOGRAPHER: The time is 10:59 a.m.
14 We are now on the record.

15 BY MR. JANSSEN:

16 Q. Mr. Boland, thank you for signing the
17 Tennessee protective order while we were on break.

18 So I'm going to show you what's been
19 marked as Exhibit 6 for purposes of your deposition.
20 The first page of Exhibit 6 has in the bottom
21 right-hand corner the Bates No. METATNAG-040-
22 00001918. And I will not be asking you questions on

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1 the page ending -1918 or the page ending in -1919.
2 Those are two emails there where you are not copied.
3 But I'll be focusing my questions on the last three
4 pages of the email marked as Exhibit 6.

5 MR. GOLDFARB: And, Mr. Boland, if you
6 need to --

7 BY MR. JANSSEN:

8 Q. Yes --

9 MR. GOLDFARB: -- review --

10 BY MR. JANSSEN:

11 Q. -- take the time you need to look at it.

12 MR. GOLDFARB: -- the document to -- so
13 you're able to answer questions, please do.

14 MR. SNEED: And just to be clear. As we
15 discussed off the record, Meta -- on behalf of Meta,
16 we would object to the use of the first couple of
17 pages, given that Mr. Boland is not on it, as a
18 Highly Confidential document.

19 THE WITNESS: Okay.

20 BY MR. JANSSEN:

21 Q. So, Mr. Boland, if I could first direct
22 your attention to the page of Exhibit 6 with the

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1 Bates number ending 1926 in the bottom right-hand
2 corner.

3 A. Yes.

4 Q. Do you see there about three-quarters of
5 the way down the page there is an email from
6 Ms. Sandberg?

7 A. Yes.

8 Q. It's on April 4th, 2014, at 4:30 p.m.
9 and so she writes, "All, Mark wants to explore my
10 favorite idea again, an ads-free version of Facebook.
11 His reasoning is that offering this, even if we only
12 broke even, would be a major brand improvement for
13 us."

14 Did I read that correctly?

15 A. You did.

16 Q. Do you have an understanding of what an
17 "ads-free version of Facebook" is?

18 A. It would be the option for users to pay
19 for their use of Facebook, as opposed to Facebook
20 being free for them, in exchange for not having ads
21 in their Facebook News Feed or on their Facebook
22 website.

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1 Q. And then if you turn to the next page of
2 Exhibit 6, Ms. Sandberg's email continues. She
3 writes, "Joel can help coordinate this work." And
4 she writes "Parts:" and then, in the second bullet
5 point down from there, she references "Bolland," with
6 two Ls.

7 Do you see that?

8 A. I do.

9 Q. Do you understand that to be a reference
10 to you, Mr. Boland?

11 A. I do.

12 Q. And is she describing there what she's
13 asking you to do with regards to looking into this
14 issue?

15 MR. SNEED: Object to form and foundation.

16 THE WITNESS: Yes.

17 BY MR. JANSSEN:

18 Q. As for an ads-free version of Facebook,
19 to your knowledge, Mr. Boland, has Facebook ever
20 launched an ads-free version of the Facebook
21 application in the United States?

22 A. To my knowledge, no.

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1 Q. In the next email after Ms. Sandberg's
2 email, Mr. Wehner -- did I pronounce that correctly?

3 A. You did.

4 Q. He replies at 4:43 p.m. on Friday,
5 April 4th.

6 Do you see that?

7 A. I do.

8 Q. And you were listed as a copy on that
9 email from Mr. Wehner.

10 Do you see that?

11 A. I do.

12 Q. And then in the second paragraph of the
13 body of his email, he writes, "When we looked at this
14 in the past the break even was a surprisingly high
15 subscription price given the likelihood of adverse
16 selection by highly engaged users."

17 Did I read that correctly?

18 A. You did.

19 Q. Do you have an understanding of what is
20 meant by "adverse selection by highly engaged users"?

21 MR. GOLDFARB: Objection to form.

22 MR. SNEED: Object to form and foundation.

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1 MR. GOLDFARB: Foundation.

2 THE WITNESS: I do.

3 BY MR. JANSSEN:

4 Q. What is "adverse selection by highly
5 engaged users"?

6 MR. SNEED: Same objections.

7 THE WITNESS: If you look at how people
8 use Facebook products, not every person uses Facebook
9 the same way or the same amount of time, or even the
10 same type of ways that they engage.

11 Some people would be a clicky user. They
12 actually click on more things. Some people may show
13 up far more frequently, multiple times an hour, some
14 people might show up once a week.

15 The people who were the most engaged users
16 of Facebook, who spent the most time on Facebook,
17 would also, as a per-user basis, generate the most
18 advertising revenue for Facebook. And if the people
19 who use Facebook the most become the most likely to
20 pay for an ads-free version of Facebook, then, in
21 order to replace that lost revenue, you need to have
22 a relatively high price point because the people

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1 leaving the ad system, opting out of ads or the --
2 opting in to the paid version, would sacrifice a
3 disproportionately large amount of advertising
4 revenue.

5 BY MR. JANSSEN:

6 Q. And you testified that the people who
7 spent the most time on Facebook would also be, as a
8 per-user basis, generate the most advertising revenue
9 for Facebook. Was that the same for Instagram during
10 your time at the company?

11 MR. SNEED: Object to form and foundation.

12 THE WITNESS: I don't have data on that or
13 recall seeing specific data on that.

14 BY MR. JANSSEN:

15 Q. If I could now direct your attention to
16 the page ending in 1925, the next email after
17 Mr. Wehner's. It is one from Susan Li. It begins
18 about two-thirds of the way down the page on Bates
19 ending 12 -- 1925.

20 Do you see that?

21 A. I do.

22 Q. And Ms. Li sent that on Friday, April 4,

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1 2014, at 4:53; is that correct?

2 A. That is what the email says.

3 Q. And you again are listed as a copy on
4 Ms. Li's email; is that correct?

5 A. That is correct.

6 Q. And then she writes, "Below is the email
7 that I distributed the last time we looked at this
8 (last August). The data is a little bit dated but I
9 think the distribution is still directionally true -
10 happy to refresh if this group thinks that would be
11 valuable."

12 And then below that she begins a paragraph
13 that says, "We wanted to follow up"

14 Do you see that?

15 A. I do.

16 Q. Is it your understanding that that
17 paragraph beginning with "We wanted to follow up"
18 is what she's recirculating from when the group last
19 looked at this issue of an ads-free version of
20 Facebook?

21 A. That is how I would read it.

22 Q. So looking further down into that

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1 paragraph beginning with "We wanted to follow up,"
2 the last sentence beginning on that page ending in
3 1925, it says, "Max looked at the distribution of
4 revenue across users and found, as we might have
5 expected, that a very small percentile users comprise
6 an enormous amount of revenue."

7 Did I read that correctly?

8 A. You did.

9 Q. Do you have an understanding of what's
10 written there, "that a very small percentile of users
11 comprise an enormous amount of revenue"?

12 MR. SNEED: Object to form and foundation.

13 THE WITNESS: I do.

14 BY MR. JANSSEN:

15 Q. Is it the same issue you were just
16 describing regarding Mr. Wehner's email regarding
17 highly engaged users generating revenue for the
18 Facebook company?

19 MR. SNEED: Same objections.

20 THE WITNESS: I do.

21 BY MR. JANSSEN:

22 Q. Can you just please explain for the jury

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1 your understanding of what it means that a very small
2 percentile of users comprise an enormous amount of
3 revenue?

4 A. In that if you have a broad distribution
5 of people using Facebook's products and services,
6 that the way that they engage will follow a
7 distribution that's not uniform, and that a small
8 number of people who use Facebook's products are very
9 significant users of Facebook's products and click on
10 a lot of things and engage with a lot of content on
11 Facebook; and so, those people, by the fact that
12 they spend more time and engage with more content,
13 including ads, would generate more revenue than the
14 average user on Facebook.

15 Q. Are you able to quantify those issues at
16 all; either the small number of users or the -- the
17 proportionate amount of revenue that that small
18 number may generate for the company?

19 MR. SNEED: Object to form.

20 THE WITNESS: I don't remember that.

21 BY MR. JANSSEN:

22 Q. The email goes on to state, "He also found

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1 that ARPU rises steadily with daily impression count,
2 implying that ARPU is pretty heavily correlated with
3 user activity."

4 Do you see that?

5 A. I do.

6 Q. What does the acronym "ARPU" mean?

7 A. That stands for average revenue per user.

8 Q. And in Ms. Li's email she notes "that ARPU
9 rises steadily with daily impression count."

10 Do you have an understanding of what that
11 means?

12 A. I do.

13 Q. What does that mean, "that ARPU rises
14 steadily with daily impression count"?

15 MR. SNEED: Object to form.

16 THE WITNESS: One quick correction. I
17 can't remember if it's average or annual revenue per
18 user.

19 BY MR. JANSSEN:

20 Q. Okay.

21 A. But the revenue-per-user part is correct.
22 It essentially says that that metric of

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1 per-user revenue is not necessarily caused by user
2 activity, but that if you have a lot more activity on
3 the platform, you generate a lot more revenue from
4 that user activity.

5 In this case, talking about impression
6 counts, meaning how many stories, posts, videos, a
7 person would see on the platform.

8 Q. Does the company take efforts to increase
9 users' activity on the platform?

10 MR. GOLDFARB: Objection to form.

11 MR. SNEED: Object to form.

12 THE WITNESS: Yes.

13 BY MR. JANSSEN:

14 Q. In what ways, to your knowledge, does the
15 company do that?

16 A. By looking at ways that you could design
17 the layout of Facebook, how you would rank stories,
18 so ranking plays a significant role in how people
19 find the content on Facebook interesting to them.

20 Generally the more interesting that
21 content is -- and "interesting" applies very broadly
22 because some things that are rage-inducing can be

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1 interesting -- but as the algorithm can rank more
2 interesting content, then you can get people to share
3 more posts, click on them, comment, like, et cetera.

4 Q. You -- again, your answer, by saying that
5 the design of the layout of Facebook could increase
6 user activity on the application, what did you mean
7 by the design of the layout of Facebook?

8 MR. SNEED: Object to form.

9 THE WITNESS: There is a lot of work that
10 you can do in how you change all aspects of a post or
11 a story, including the way that you represent the
12 title of a post, including the way that you show
13 whether people have engaged with that post, including
14 minor things like the color shading behind the post.
15 All of those changes, and countless more, can impact
16 the way that people engage with content on Facebook-
17 style platforms.

18 BY MR. JANSSEN:

19 Q. Are you aware of any other things that
20 the company may do to increase user activity on the
21 platform?

22 MR. GOLDFARB: Objection to form.

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1 THE WITNESS: Not top of mind.

2 BY MR. JANSSEN:

3 Q. Thank you. You can set aside Exhibit 6,
4 Mr. Boland.

5 And -- actually, bear with me one moment.
6 I spoke too soon. My apology, Mr. Boland. If I
7 could ask you to pick up Exhibit 6 again.

8 So I asked you a question about the first
9 part of that last sentence at the top of page ending
10 1926. And "ARPU" either stands for average or annual
11 revenue per user, one of those. I wanted to ask you
12 about that last part of that sentence beginning after
13 the comma.

14 So again, just reading the whole sentence.
15 It says, "He also found that ARPU rises steadily with
16 daily impression count, implying that ARPU is pretty
17 heavily correlated with user activity."

18 Do you see that?

19 A. I do.

20 Q. And does that describe what you've been
21 testifying to over the past few minutes regarding the
22 company's revenue increasing from ad surveying based

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1 on increased usage of the Facebook platform by users?

2 MR. SNEED: Object to form.

3 THE WITNESS: Yes. More usage correlates
4 with more money.

5 BY MR. JANSSEN:

6 Q. Thank you, Mr. Boland. Now we can move on
7 from Exhibit 6. Apology for that.

8 A. No problem.

9 (Exhibit Meta-Boland-7 marked.)

10 BY MR. JANSSEN:

11 Q. Next I want to show you an email that you
12 sent during your time at the Facebook company that's
13 been marked as Exhibit 7.

14 A. Okay.

15 Q. So Exhibit 7, the bottom right-hand
16 corner, see it has a Bates number METATNAG-019-
17 01460678?

18 A. I do.

19 Q. And this is an email from you; is that
20 correct?

21 A. That is correct.

22 Q. And it's dated June 13th, 2018; is that

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1 THE WITNESS: Yes, that would be that
2 some of these products like Messenger Kids would
3 eventually have people become Facebook app users, so
4 Facebook Blue users.

5 BY MR. JANSSEN:

6 Q. And was that a goal of the Facebook
7 company in this 2018 time period?

8 MR. SNEED: Object to form and foundation.

9 THE WITNESS: I don't know that that was a
10 specific company-level goal, but I do know that there
11 were teams and people working on those types of
12 products.

13 BY MR. JANSSEN:

14 Q. Got it. Okay.

15 You can set aside Exhibit 7, Mr. Boland.

16 (Exhibit Meta-Boland-8 marked.)

17 MR. JANSSEN: I now want to show you
18 another article that's been marked as Exhibit 8.

19 Thank you. Thank you.

20 MR. GOLDFARB: And, Counsel, do you want
21 Mr. Boland to look through the document?

22 MR. JANSSEN: You can please review as

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1 helpful to refresh yourself, but I'll be focusing
2 questions just on a couple paragraphs in the first
3 three pages and then the part where Mr. Boland is
4 referenced, beginning on Page 8 of 25.

5 THE WITNESS: You can start. I may take
6 extra time around the section if I need it.

7 BY MR. JANSSEN:

8 Q. Got it.

9 Mr. Boland, this, what's been marked as
10 Exhibit 8, is an article from Vox.

11 Have you ever seen this article before,
12 Mr. Boland?

13 A. I have.

14 Q. And the title of the Vox article is "How
15 to fix Facebook."

16 Do you see that?

17 A. I do.

18 Q. And the -- the subtitle below that on the
19 first page says, "Can Facebook be redeemed? Twelve
20 leading experts share bold solutions to the company's
21 urgent problems."

22 Did I read that correctly?

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1 A. You did.

2 Q. The author is listed as Shirin Ghaffary.
3 Do you see that?

4 A. I do.

5 Q. And the date is November 8th, 2021; is
6 that correct?

7 A. That is correct.

8 Q. The article begins -- towards the bottom
9 of that page, it says, "Facebook is broken, and after
10 a recent deluge of damning internal company leaks to
11 the press and Congress, the world has unassailable
12 proof of how troubled it really is."

13 Did I read that correctly?

14 A. You did.

15 Q. And then if I could direct your attention
16 to Page 3 of 25 of Exhibit 8. About halfway down the
17 page, there is a paragraph that begins "So now ..."

18 Do you see that?

19 A. Yes.

20 Q. And the article states, "So now is an
21 urgent time to explore ideas old and new - inside and
22 outside the realm of political reality - about how to

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1 confront a seemingly intractable problem: Can
2 Facebook be fixed?"

3 Did I read that correctly?

4 A. You did.

5 Q. The author goes on, "To try to answer that
6 question, Recode interviewed 12 of the leading
7 thinkers and leaders on Facebook today"

8 And then, if you see, a few lines down
9 from that, you are referenced, correct, Mr. Boland?

10 A. That is correct.

11 Q. And it says "... to former Facebook
12 executive Brian Boland, who was one of the few
13 high-ranking employees at the company to speak out
14 publicly against Facebook's business practices."

15 Did I read that correctly?

16 A. You did.

17 Q. That paragraph references Recode as
18 interviewing 12 of the leading thinkers and leaders
19 on Facebook today.

20 Do you know what Recode is?

21 A. I know that Recode is a publication. I
22 don't know the relationship to Vox.

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1 Q. Do you know who reached out to you to
2 interview you about the issues addressed in this
3 article?

4 A. I'm pretty sure it was Shirin, but not
5 certain.

6 Q. And, Mr. Boland, if I can now direct your
7 attention to Page 8 of 25 of Exhibit 8. About
8 halfway down the page it lists you, "Brian Boland,
9 former Facebook executive."

10 Do you see that?

11 A. I do.

12 Q. And then a little bit further down, in
13 bold, it says, "How would you fix Facebook?"

14 Do you see that?

15 A. I do.

16 Q. Did Shirin ask you that when she
17 interviewed you for this article?

18 A. Yes.

19 Q. And then below that question begins some
20 narrative text.

21 Do you see that?

22 A. Yes.

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1 Q. And is that the answer that you gave to
2 the author when she asked you how would you fix
3 Facebook?

4 A. Yes.

5 Q. In the second paragraph there, it says,
6 "The one thing that Facebook could control right now
7 is transparency. Helping society understand the
8 harms on social media is an important step for fixing
9 the problems."

10 Did I read that correctly?

11 A. You did.

12 Q. Mr. Boland, what harms on social media are
13 you aware of that you felt social media companies
14 should but were not adequately disclosing to the
15 public?

16 MR. SNEED: Object to form.

17 THE WITNESS: At the point of this
18 article, I had an expanded set of concerns from when
19 I left the company. I, as a part of the Wall Street
20 Journal reporting for their series on Frances Haugen,
21 had been shown an array of documents from inside of
22 Facebook that made up her disclosures and their

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1 reporting and introduced me to some of the concerns
2 you're worried about today, with teens and youth, as
3 well as other concerns around human trafficking in
4 the Middle East, around cartel recruitment in Mexico;
5 and started to see that, without that transparency,
6 it was very hard to find these things and to combat
7 them.

8 So it was a broad array that expanded
9 from very clear and compelling documents from
10 Frances Haugen that seemed to have been created by
11 people internal to the company that were concerned
12 about or highlighting some of these issues as well.

13 BY MR. JANSSEN:

14 Q. And you referenced the issues surrounding
15 teens and youth, that that -- that we've brought a
16 consumer protection enforcement action concerning.
17 What was it about the issues affecting teens and
18 youth that was concerning to you at the time of this
19 interview and article?

20 MR. SNEED: Object to form.

21 THE WITNESS: My feeling is that there's
22 enough concerning internal research that I know that

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1 Facebook downplays but I just couldn't understand
2 as a parent -- and a lot of the leaders of the
3 company are parents -- how there could even be the
4 possibility that your product was harmful to teens
5 and youth, and you wouldn't make it a major priority
6 to figure that out.

7 And it's an incredible amount of hubris or
8 carelessness or disregard to assume that you know
9 better as a company and corporate leader when you
10 could get help.

11 I don't believe these problems are easy
12 problems. They're very difficult. But there are
13 experts around the globe who have long been willing
14 to help figure out what's happening on Facebook. If
15 today I told you that I believe that Facebook was
16 harmful to teens and youth, that's an opinion.

17 The company doesn't provide any ability
18 for us as a society to know, and that, for me, is a
19 problem.

20 BY MR. JANSSEN:

21 Q. Can I next ask you, Mr. Boland, to turn to
22 the last part of your section of this Vox article,

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1 which is on page of -- 10 of 25 of Exhibit 8. And
2 about a third of the way down Page 10 of 25, you see
3 there's a bolded question that says, "Do you think
4 Facebook can be reformed with Mark Zuckerberg at the
5 helm?"

6 Do you see that, Mr. Boland?

7 A. I do.

8 Q. Did Shirin ask you that question when she
9 interviewed you for purposes in this article?

10 A. Yes.

11 Q. And is what's written below there the
12 answer that you gave when being interviewed for this
13 article?

14 A. Yes.

15 Q. Can you please read for the jury the
16 answer that you gave to that question as part of this
17 reporting.

18 A. "There's a chance, with strong regulatory
19 oversight, that they'll be forced to change - but his
20 nature is not to move in this direction. If we want
21 Facebook and Instagram to be responsible and safer,
22 then I don't think you can have him and the current

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1 leadership team leading the company."

2 Q. So that this segment of the article
3 summarizing your interview ends with you saying that,
4 "If we want Facebook and Instagram to be responsible
5 and safer, I don't think you can have him and the
6 current leadership team leading the company."

7 Mr. Boland, why is it that Facebook and
8 Instagram cannot become responsible and safer with
9 Mr. Zuckerberg and the current leadership team
10 leading the company?

11 MR. SNEED: Object to form.

12 THE WITNESS: My feeling then and my
13 feeling now is that they don't meaningfully care
14 about user safety. It's not something that they
15 spend a lot of time on. It's not something that they
16 think about. And I really think they don't care.

17 BY MR. JANSSEN:

18 Q. And was that driven home when you saw the
19 headcount issues regarding safety resources that you
20 described earlier in your testimony today?

21 MR. SNEED: Object to form.

22 THE WITNESS: That was one of a growing

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1 Q. Okay. Thank you, Mr. Boland.

2 You can set aside Exhibit 9.

3 One piece of housekeeping I, again, forgot
4 to do with Exhibit 6. If I could ask you to pick
5 that up again, and I could direct your attention back
6 to the Bates number ending 1925. It's the three
7 emails: the one from Ms. Li on Friday, April 4th, at
8 4:53; the one from Mr. Wehner, Friday, April 4, 2014,
9 at 4:43 p.m.; and the one from Ms. Sandberg on
10 April 4, 2014, 4:30 p.m.

11 Mr. Boland, are those emails on this
12 Exhibit 6 true and accurate copies of the emails
13 that you received in the ordinary course of your
14 employment at Facebook?

15 A. I would assume so, yes.

16 Q. Okay. That's all for that. Thank you for
17 doing that.

18 (Exhibit Meta-Boland-10 marked.)

19 BY MR. JANSSEN:

20 Q. I want to show you a document that's been
21 marked as Exhibit 10 to your deposition.

22 Mr. Boland, have you seen Exhibit 10

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1 before?

2 A. Yes.

3 Q. What is Exhibit 10?

4 A. This is a post that I wrote on our blog
5 outlining why I was deleting Facebook and my concerns
6 about the company broadly.

7 Q. And you did this on the blog that you
8 maintain with the Delta Fund; is that correct?

9 A. That is correct.

10 Q. And you posted this on the blog, is that
11 on January 7th of this year, 2025?

12 A. That is correct.

13 Q. The title of your blog post is, "Deleting
14 Facebook." And then right below that you write, "Why
15 I'm Deleting Facebook Tomorrow."

16 Correct?

17 A. That is correct.

18 Q. And then you begin your post by stating,
19 "Tomorrow I will delete my Facebook account. Before
20 I do, I want to share" my -- "share why I made this
21 decision and believe it matters.

22 "I quit Facebook in 2020 because I was

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1 deeply concerned that Mark Zuckerberg and Meta's
2 leadership weren't serious about addressing the harm
3 created on their platform. Over time, it became
4 clear to me that Facebook's priorities were growth
5 and power, not the safety or well-being of its
6 users."

7 Did I read that correctly?

8 A. You did.

9 Q. And you've testified over the course of
10 today's examination as to why it became clear to you
11 that Facebook's priorities were growth and power, not
12 the safety or well-being of its users, correct?

13 A. That is correct.

14 Q. And then, in the next paragraph, you write
15 in your blog post, "I didn't plan to become a public
16 critic when I left the company. Leadership dismissed
17 my concerns, and I second-guessed myself until
18 January 6, 2021."

19 Did I read that correctly?

20 A. You did.

21 Q. You referenced that leadership dismissed
22 your concerns. What concerns did you convey to

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1 leadership that they dismissed in response?

2 A. That was my drive to build better research
3 transparency and external accountability into our
4 products and into a set of services that I felt would
5 have provided a phenomenal opportunity to understand
6 anything harmful on the platform and received no
7 support and received pushback that I was wrong.

8 Q. Is this what you were testifying to
9 earlier about your proposal for how you might remain
10 at the company --

11 A. That is correct.

12 Q. -- past 2020?

13 And that you referenced Mr. Bosworth being
14 most vocal about his response?

15 A. That is correct.

16 Q. And then in the next paragraph you write,
17 "On January 11th, a Meta leader deflected
18 responsibility"

19 And is that a reference to deflecting
20 responsibility for the January 6th attacks on the
21 Capitol?

22 A. That is correct.

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1 Q. And at the end of that paragraph, you
2 write, "Worse, this was just another example of its
3 leadership dodging accountability."

4 Did I read that correctly?

5 A. You did.

6 Q. Sitting here today, can you give any
7 additional examples of when Meta leadership dodged
8 accountability for a problem?

9 MR. SNEED: Object to form.

10 THE WITNESS: It was similar to the 2016
11 election and whether any external interference had
12 happened on the platform, and the company speaking
13 out publicly without really knowing what was
14 happening internally. That's one example.

15 For a lot of the other examples around
16 things that would happen on the platform, whether it
17 was suicides on video or whether our News Feed was
18 showing certain types of content or not, the exercise
19 was often approached as a response to the press
20 exercise that would try to frame things as general
21 societal issues rather than potential product issues.

22 BY MR. JANSSEN:

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1 Q. Is it your understanding, sitting here
2 today, that the company is dodging accountability for
3 teen mental health harms related to Instagram use?

4 MR. SNEED: Object to form and foundation.

5 MR. GOLDFARB: Object to form.

6 THE WITNESS: To my knowledge, I don't
7 believe that they have tried hard or potentially
8 tried beyond the most minimal amount to understand
9 whether they're harmful to teen mental health.
10 BY MR. JANSSEN:

11 Q. Moving down in your blog post. You write,
12 "A Pattern of Neglect and Harm. The latest news that
13 Meta is ending its fact-checking program and scaling
14 back user protections is the final straw for me.
15 This is the same company whose platform contributed
16 to genocide in Myanmar, harmed teenage users and
17 enabled political and racial polarization across the
18 globe. Instead of addressing these harms, Meta
19 consistently prioritizes growth over public safety."

20 Did I read that correctly?

21 A. You did.

22 Q. And then, if you look at the last sentence

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1 on that first page of Exhibit 10, you write,
2 "This move was part of a broader pattern: when
3 transparency threatens profits, Meta chooses
4 secrecy."

5 Did I read that correctly?

6 A. You did.

7 Q. Is it fair to characterize Meta as a
8 secretive company?

9 MR. GOLDFARB: Object to form.

10 MR. SNEED: Object to form; vague.

11 THE WITNESS: I would, and did,
12 characterize Meta as a secretive company.

13 BY MR. JANSSEN:

14 Q. And why would you characterize them in
15 that way?

16 A. First, there is no push towards
17 transparency and partnering with the world to
18 understand the platform. There is no sort of way for
19 external -- whether you're sharing data externally,
20 there's no way to invite -- or, there's no efforts to
21 invite people in to help with oversight and feedback
22 and ensure the company's operating in ways that are

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1 the best for society.

2 And with the way that the company goes
3 after critics generally and whistleblowers to
4 discredit them, it's clear that -- to me, that the
5 company doesn't like external voices criticizing the
6 company.

7 Q. If you could please turn to the second
8 page of your blog post. In the second-to-last
9 paragraph on that page, you write, "For me, the
10 choice is clear. I no longer want to support a
11 company whose values and actions are deeply
12 misaligned with mine. If you feel the same, I
13 encourage you to consider your role in enabling
14 Meta's power."

15 Did I read that correctly?

16 A. You did.

17 Q. After you posted this to your Delta Fund
18 blog on January 7th, did you, in fact, delete your
19 Facebook accounts?

20 A. I did.

21 Q. Have you since rejoined the platform in
22 any way?

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1 reading and hearing from former employees that
2 research teams have been decreased, that the freedom
3 of research teams to research their own interests
4 has decreased felt like a broad step away from
5 transparency and understanding of the product.

6 Q. And you said "at the end of the company,"
7 and I think you meant to say "at the end of your
8 tenure at the company"; is that right?

9 A. Yes.

10 I don't have the app anymore, but I know
11 it still exists.

12 Q. All right. You can put that document
13 aside.

14 So I know you just spent a lot of time
15 talking about advertising, and we're not going to go
16 into any specific documents. And I actually want to
17 ask you to step back for a minute. Can you explain,
18 at a very high level, not using any kind of
19 advertising terminology, how Facebook makes money
20 from its ad business.

21 MR. SNEED: Object to form.

22 THE WITNESS: Every day a lot of people --

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1 and I think we're in the billions now -- use Facebook
2 and Instagram, meaning that they show up to these
3 places and they spend time looking at posts from
4 their friends, family, from businesses, and
5 influencers, and from a broad array of content.

6 That creates a relatively unprecedented
7 amount of time and attention that people who run
8 businesses and sell things, like toothpaste, would
9 love to be able to influence how those people think
10 and feel and buy their products. That's what a lot
11 of advertising businesses do.

12 And so showing ads inside of Instagram or
13 Facebook is a great starting place to be able to
14 build an ads business where advertisers want to spend
15 a lot of money and pay the company. If you go beyond
16 that and you make it so that the ads are incredibly
17 personalized so that you're seeing, as a person
18 spending that time, an ad that's incredibly relevant
19 to you, you're more likely to click on it, you're
20 more likely to purchase a product, you're more likely
21 to be a valued customer of that business, which makes
22 Facebook and Instagram incredibly valuable to those

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1 businesses.

2 And then if I can help you measure that so
3 that you're not just hoping that the ads that you put
4 on Facebook deliver growth for your business but I
5 actually faithfully measure those ads, you will have
6 the confidence as a business to show more ads on
7 Facebook.

8 And that's as simple as the model is, is
9 that it's really relevant ads that grow businesses,
10 that reach people who are spending a massive amount
11 of time on those places.

12 BY MS. SINGER:

13 Q. Okay. So I take it that it's fair to say
14 that Meta's financial success is, at least in part,
15 perhaps in large part, dependent on its ability to
16 add, retain, and engage its users in order to deliver
17 those ads?

18 A. Ab- --

19 MS. SINGER: Object to form.

20 THE WITNESS: Absolutely correct.

21 BY MS. SINGER:

22 Q. And I think you testified earlier that

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1 engaging.

2 BY MR. WARREN:

3 Q. Do you think he should have engaged with
4 you in order to understand your criticisms better?

5 MR. GOLDFARB: Objection to form.

6 MR. SNEED: Object to form.

7 THE WITNESS: I think he should have prior
8 to that article and subsequently to that article, as
9 I think the company should have engaged on those
10 concerns beforehand.

11 BY MR. WARREN:

12 Q. Earlier in your testimony, you used the
13 phrase "move fast and break things."

14 Do you recall saying that?

15 A. I do.

16 Q. Did you come up with that phrase?

17 A. I did not.

18 Q. Who came up with it?

19 A. I don't know who actually created that
20 phrase, but that was a very common poster and mantra
21 in the early days of Facebook.

22 Q. When you say it was a "poster," do you

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1 advertising was the primary or the largest source of
2 Facebook's revenue; is that right?

3 A. That is correct.

4 Q. And how do you know that?

5 A. I was involved in the financial reporting
6 of the company at the time I was there.

7 Q. Okay. And I think this was part of what
8 you just said, but revenues Met- -- sorry.

9 Meta's revenue is dependent upon
10 advertisers' willingness to continue to do business
11 with the company, correct?

12 A. That is correct.

13 Q. And you talked about Meta's delivery of
14 ads to targeted audiences, but that's a key part of
15 its ad business, correct?

16 A. That is correct.

17 Q. And in order to deliver targeted ads --
18 and I know you talked about this in granular
19 detail -- Meta relies on user data, correct?

20 A. That is correct.

21 Q. And that includes a user's age and gender,
22 correct?

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1 engaging.

2 BY MR. WARREN:

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4 you in order to understand your criticisms better?

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20 phrase, but that was a very common poster and mantra
21 in the early days of Facebook.

22 Q. When you say it was a "poster," do you

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1 literally mean that it was a poster on the walls of
2 Facebook?

3 A. It literally was a poster on the walls.

4 Q. Do new employees at Meta receive a
5 pamphlet known as the Red Book?

6 A. Yes. But I think that was after I was a
7 new employee.

8 Q. Okay. Have you seen a copy of the
9 Red Book?

10 A. I have, but I didn't actually get one.

11 Q. Do you know if the Red Book uses the
12 phrase "move fast and break things?"

13 MR. SNEED: Object to form --

14 MR. GOLDFARB: Objection to form --

15 THE WITNESS: I don't.

16 MR. SNEED: -- foundation.

17 MR. GOLDFARB: -- foundation.

18 BY MR. WARREN:

19 Q. What did you understand "move fast and
20 break things" to mean as it was used by employees at
21 Meta?

22 MR. SNEED: Object to form; foundation.

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1 THE VIDEOGRAPHER: Counsel.

2 MR. GOLDFARB: Oh, thank you.

3 THE WITNESS: The idea being that it was
4 really important to build products quickly and put
5 them out on the market quickly, and that sometimes
6 you would put out products that didn't work
7 correctly, that may break an existing system; but
8 that constant movement, constant building, constant
9 iteration was more important than building something
10 that wouldn't break.

11 BY MR. WARREN:

12 Q. Are you familiar with the motto "safety
13 first"?

14 A. No.

15 Q. Is "move fast and break things" a motto
16 that puts safety first?

17 MR. SNEED: Object to form.

18 THE WITNESS: I don't think so.

19 BY MR. WARREN:

20 Q. Mr. Boland, in your testimony earlier
21 today, you described some examples of Facebook moving
22 fast and breaking things.

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1 Do you recall that?

2 MR. SNEED: Object to form and
3 characterization of testimony.

4 THE WITNESS: Yes.

5 BY MR. WARREN:

6 Q. And one of the examples you testified
7 about concerned Facebook Live.

8 Do you remember that?

9 A. Yes.

10 Q. Specifically, and you can tell me if I'm
11 mischaracterizing your testimony, I believe you
12 testified that Facebook Live was utilized to
13 broadcast suicides and suicide attempts; is that
14 correct?

15 A. That's correct.

16 Q. What do you recall about Facebook Live
17 being used to broadcast suicides and suicide attempts
18 during the 11 years you worked at the company?

19 MR. GOLDFARB: Objection to form.

20 THE WITNESS: I remember that when the
21 product first came out, that that was an example that
22 teams were confronted with; that those tragedies had

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1 been broadcast on Facebook's Live product after it
2 was launched.

3 BY MR. WARREN:

4 Q. Were you aware of teenagers using Facebook
5 Live to broadcast suicides and suicide attempts?

6 A. I had read articles about it.

7 Q. Did that trouble you?

8 A. It did.

9 Q. Why did it trouble you?

10 A. I think it's -- any human should be
11 troubled that their product or company or something
12 that they're a part of would have that kind of
13 outcome.

14 Q. Before Meta released Facebook Live, did it
15 guard against the possibility that the feature could
16 be used in that way?

17 MR. SNEED: Object to the form.

18 MR. GOLDFARB: Objection to form.

19 THE WITNESS: Not to my knowledge.

20 BY MR. WARREN:

21 Q. Could it have done so?

22 A. I don't believe it could have necessarily

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1 prevented people from harming themselves, but I do
2 believe the company could have taken steps to better
3 understand whether they were broadcasting those
4 events.

5 Q. What sort of steps could Facebook have
6 taken?

7 MR. GOLDFARB: Objection to form.

8 THE WITNESS: I think the teams could have
9 looked at the data around the conversations, the
10 types of things that were being said, which, I
11 believe ultimately the company took some steps to
12 better understand and mitigate, that don't feel like
13 they couldn't have done beforehand.

14 BY MR. WARREN:

15 Q. Why didn't Facebook take those steps, to
16 the best of your knowledge?

17 A. Again, the goal of teams is to create
18 products and put them out in the world and see what
19 happens. So it was a growth imperative to make
20 Live Video a product and release it, as opposed to
21 slowing down and really trying to think through all
22 the negative ways that it could be used.

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REPORTER'S CERTIFICATION
DEPOSITION OF BRIAN BOLAND

APRIL 25, 2025

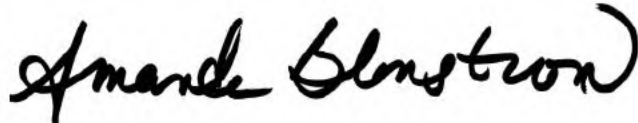
I, Amanda Blomstrom, a Notary Public in and for
the District of Columbia, hereby certify to the
following:

That the witness, BRIAN BOLAND, was duly sworn
by the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

That the deposition transcript was submitted to
the witness or to the attorney for the witness for
examination and signature;

I further certify that I am neither counsel for,
related to, nor employed by any of the parties or
attorneys in the action in which this proceeding was
taken, and further that I am not financially or
otherwise interested in the outcome of the action.

Certified to by me this 29th day of April, 2025.



Amanda Blomstrom, CRR, RMR, CLR
Texas CSR No. 8785
California CSR No. 12681
Illinois CSR No. 84-3634