

AMENDED Exhibit 813

**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

Deborah Oshuntola

1

1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA

3 -----
4 IN RE: SOCIAL MEDIA

5 ADOLESCENT ADDICTION/PERSONAL

6 INJURY PRODUCTS LIABILITY

7 LITIGATION,

Case No.

8 4:22-MD-03047-YGR

9 MDL No. 3047

10 This Document Relates to:

11 ALL ACTIONS
12 -----

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 COUNTY OF LOS ANGELES

15 UNLIMITED JURISDICTION
16 -----

17 Coordination Proceeding

18 Special Title (Rule 3.550) JCCP No. 5255

19 Judge Carolyn B. Kuhl

20 SOCIAL MEDIA CASES

Dept. 12
21 -----

22 February 4, 2025

23 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

24
25 (caption continued)

1
2 systems to talk about spam and to train
3 different models on how to recognize spam
4 and remove spam from platform.

5 Q. And then in -- let me ask why
6 did you leave Twitter in August of 2016?

7 A. So, my contract was up 'cause I
8 was contingent worker and I wasn't able to
9 get -- convert that into a full-time role,
10 and I also wanted to take a bit of a break
11 to figure out what I would do next.

12 Q. And the next -- your next
13 employment was at Snap; is that correct?

14 A. Yes, that's correct.

15 Q. And so tell me a little bit
16 about the role that you were initially
17 hired into in 2017?

18 A. I was a trust and safety
19 specialist, and so it was really using my
20 experience that I had gained from working
21 at Twitter in Trust and Safety to
22 similarly look at reports that users made,
23 any complaints that they had, and
24 investigate based on our policy, take
25 action, and get back to the users.

1
2 Q. And so let's -- let's break that
3 down just a little bit.

4 So, when you say that -- so,
5 how -- how did that work? How would you
6 have had items that were escalated to
7 Trust and Safety, if that's a fair way to
8 phrase that?

9 A. I'd say that they were more --
10 it was user reports. So users, the work
11 that I was doing when I started would be
12 users writing in through one of the
13 different ways that you can report content
14 on Snap, explaining their experience or
15 what situation they were in, and then we
16 would see how we could help.

17 Q. And in 2017 when you started,
18 was Trust and Safety the only -- the only
19 area at Snap, the only division at Snap
20 that handled those types of user reports?

21 A. Sorry, what do you mean by
22 "those types"?

23 MR. HARE: Yeah, let me
24 rephrase. It's a poor question.

25 Q. Was Trust and Safety the only

1
2 division at Snap that responded to user
3 reports of potentially harmful conduct?

4 A. Sorry, I want to make sure I'm
5 being accurate.

6 As far as I can remember, I
7 think for harmful conduct, it was within
8 the Trust and Safety remit.

9 Q. Were there any other divisions
10 at Snap that you would say you all worked
11 closely with in Trust and Safety?

12 A. Yes.

13 So I'm trying to remember back
14 to 2017. There were teams that did other
15 kind of review work for different
16 products, and also that handled, like,
17 customer feedback that wasn't specific to
18 the user but probably more about the
19 platform that Trust and Safety wouldn't
20 have looked at.

21 Q. So, looking at the first bullet
22 point that says: Worked closely with
23 Policy, Product, and Vendor partner teams
24 to launch, scale and optimize solutions
25 for enforcement of safety policies.

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Am I reading that correctly?

A. Yes.

Q. How would you work with Policy to -- to enforce? Would you collaborate with Policy, or would you listen to Policy and apply it to the trust and safety work you did?

A. As I got more senior in my role, I would still be looking at the complaints that users would write in and if there was an area that not addressed by the policy or was a bit ambiguous with the policy, that would be escalated to the Policy team. There'd be discussion about the best course of action. I would provide my perspective really like the user's advocate and that would be taken into consideration, and a policy would be written or redeveloped or clarified based on the escalation that was being worked on.

Q. And similarly, how would you work with a product to launch, scale, and optimize solutions for the enforcement of

1
2 safety policies?

3 A. Yeah, one of the concepts that
4 really is forefront at Snap is a safety by
5 design, and so that means before a product
6 is launched, it will be, you know, thought
7 about ahead of time, and so working with
8 Product, at least as part of the Trust and
9 Safety team at the time, would look like
10 advising them what could or couldn't be
11 done from a safety perspective so that
12 that could be built into the product.

13 Q. And finally, as it relates to
14 the vendor partner team to launch, scale,
15 and optimize solutions for the enforcement
16 of safety policies, tell me a little bit
17 about your role and how you all
18 collaborated with that.

19 A. So, because of the large number
20 of piece of content that are just on a
21 platform, to make sure that we can address
22 every complaint that's coming in, we work
23 with vendor teams and we -- we partner
24 with them, and so it's really important
25 that they understand policies, that they

1
2 understand new products that are coming up
3 and how it might change the work that they
4 do. And so part of my work was to make
5 sure that they had that understanding, so
6 undertaking training, providing them with
7 support, making sure that their quality is
8 in place so that they could apply our
9 policies in the way that they should have
10 been.

11 Q. And I'm going to skip ahead to
12 the last one that says: Led initiative
13 centered around the customer experience
14 and improve policy, efficacy, tooling and
15 operational design to increase enforcement
16 quality and reduce risk.

17 Specifically what kind of
18 initiatives did you lead? What do you
19 mean by that?

20 A. That's a great question.

21 So, at the time, it would have
22 been kind of just thinking about ways that
23 we can make our processes more efficient
24 or, kind of like I mentioned earlier,
25 looking at our policy and seeing where

1
2 there's room for improvement in terms of
3 like the way the vendors were
4 understanding it or if there had been a
5 product that rolled out and we thought
6 users would use it one way and they end up
7 using it a different way and we need a
8 policy to readjusting it in terms of what
9 we were seeing come through from the
10 user's side, kind of giving that feedback
11 to the Policy Team so that they could
12 develop policy again.

13 Q. And I see that you were in that
14 initial role for right at two years, and
15 then it seems that you were elevated to a
16 senior trust and safety specialist in
17 February 2019. Is that correct?

18 A. That's correct.

19 Q. How did your role change when
20 you were promoted to a senior trust and
21 safety specialist?

22 A. I think it just became a bit
23 more being an escalation point for more
24 junior members of the team.

25 Honestly, I think I'd been doing

1
2 a bit of the role in my other specialist
3 anyway. So I didn't really feel like a
4 change just as much of a recognition of
5 the work I'd been doing already.

6 Q. Just kind of a natural
7 progression already?

8 A. Mm-hm.

9 Q. And then I see in it looks like
10 there's a little gap between September
11 2019 and August 2020.

12 Is that -- did you leave
13 Snapchat, or is that -- tell me a little
14 bit about what was going on during that
15 year?

16 A. No, I didn't leave Snap.

17 Q. I apologize. I'm misreading
18 that, aren't I?

19 That -- that September 2019, the
20 senior augmented reality moderation
21 specialist September 2019 to August 2020,
22 correct?

23 A. Yes, that's correct.

24 Q. All right. Apologies.

25 Tell me -- tell me a little bit

1
2 about that role and that change of roles
3 and what that encompassed.

4 A. So, while I was a trust and
5 safety specialist at the end of February
6 2017 -- sorry, at the end of the year
7 2017, Snapchat launched a Lens Studio and
8 so that had been all reviewing the content
9 that came from that platform was under the
10 trust and safety agreement, and so from
11 December 2017 I was working on what we
12 call lenses and reviewing them, and that
13 was lenses submitted by community members.

14 And so one of the projects I
15 worked on as a trust and safety specialist
16 and then senior specialist was lenses and
17 the review of them, and so I did that hand
18 in hand with my trust and safety work, and
19 then as lenses grew as a platform, as that
20 work also grew and it became its own
21 workflow and it was in 2020 when it was
22 like really officially -- or actually, I
23 guess, 2019, yes, 2019 when it officially
24 became its own workflow and then 2020 when
25 it became its own team, separate team. So

1
2 that's reflected in my transition from
3 being a trust and safety specialist to a
4 senior augmented reality moderation
5 specialist.

6 Q. So, you said that in late 2017,
7 Snap developed Lens Studio; is that
8 correct?

9 A. Yes.

10 Q. What exactly is Lens Studio?

11 A. Lens Studio is a desktop app
12 that anyone in the world can use to create
13 their own lens.

14 Q. And tell me like I've never used
15 Snapchat before what is a lens?

16 A. A lens is what Snap calls its
17 augmented reality product that allows you
18 to overlay what's computer technology that
19 allows you to overlay something on top of
20 the real world. So the whole point is to
21 improve, augment, the real world reality.

22 Q. So, and you said that Lens
23 Studio allowed users or the community to
24 develop lenses. Is that fair?

25 A. That's correct.

1
2 MR. DARBY: And this is
3 SNAP0030424.

4 (Snap-Oshuntola-3, email thread
5 ending 5/26/2017, Bates SNAP0030424,
6 was marked for identification, as of
7 this date.)

8 BY MR. HARE:

9 Q. Take a moment to review that
10 document, please.

11 And before we get into the
12 document, so, we're going to go back to
13 2017 when you were in your initial role at
14 Trust and Safety for a little while.

15 Now, that was your role at that
16 time, correct?

17 A. Yes.

18 Q. And so, what are we looking at
19 here generally?

20 A. This is an email escalating a
21 user complaint.

22 Q. And so just to -- to back up.
23 This is an email and I see in the "from"
24 it's from [REDACTED]

25 Is that your email address?

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A. It is.

Q. And is email a common way that you communicate with other employees about work at Snapchat?

A. Yes.

Q. And that was true in 2017?

A. Yes.

Q. And is that still true today?

A. Yes.

Q. And has your -- your email address, is it still [REDACTED], or has that ever changed?

A. It's still d[REDACTED].

Q. Okay.

And [REDACTED] is in the "to" line.

And I think I recall you mentioning [REDACTED] earlier? Who is [REDACTED]?

A. She was my manager at the time.

Q. And also copied I see Nona Yadegar and [REDACTED]

A. Yes.

Q. Who are they?

1
2 A. Nona was, I think she was the
3 manager or policy person. I don't know,
4 she's had a couple of roles. I don't
5 remember what her role was at that time.

6 [REDACTED] was, I believe he was a
7 product manager for Safety at the time.

8 Q. And so, scrolling down to the --
9 to the bottom of the document, you say:
10 Hey [REDACTED]. A user has written in
11 complaining about the content within
12 custom stories that has been -- that have
13 been Geofenced at their school. The
14 reported user currently has no story
15 content up.

16 Am I reading that correctly?

17 A. That's correct.

18 Q. So, and I believe you said a
19 minute ago that we were looking at a email
20 of you escalating a user generated report.

21 Is that fair?

22 A. Yes.

23 Q. So, earlier we talked about,
24 kind of, the way the process works while
25 within Trust and Safety for moderating

1
2 potentially violating conduct.

3 Is that fair?

4 A. That's correct.

5 Q. So, in this instance --

6 MR. HARE: Well, strike that
7 question.

8 Q. Was it common of -- at -- in
9 your role in 2017 that you would email
10 your manager to escalate concerns during
11 your moderation?

12 A. Every now and then, yes.

13 Q. What other ways would you
14 escalate?

15 A. I think mostly email.

16 Q. Okay.

17 And so, reviewing this it says
18 that "complaining about content within
19 custom stories."

20 What is a custom story?

21 A. I don't remember.

22 Q. Fair enough.

23 It says "custom stories have
24 been Geofenced at their school."

25 Do you know what Geofenced

1
2 means?

3 A. I don't remember.

4 Q. Okay.

5 And if we -- we look up a little
6 bit higher, and it looks that the school
7 referred to is Tigard High School,
8 according to your email on -- at 10:41 a.m.

9 Is that correct?

10 A. Yes.

11 Q. And you mention that the -- you
12 believe he's referring to group stories.

13 Do you see that?

14 A. Yes.

15 Q. What is a group story?

16 A. So, I'm trying to make sure I'm
17 thinking about the right features so I can
18 answer the question accurately, but I
19 don't think I remember. I'm sorry.

20 Q. Well, if we go back up to that
21 same email from 10:41 a.m. your second
22 sentence says: The IT director has
23 written in saying that CSE content was
24 posted on custom stories where the school
25 was Geofenced.

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Am I reading that correctly?

A. Yes.

Q. What is CSE content?

A. That stands for child sexual exploitation.

Q. Okay. And is child sexual exploitation, would that be something that was commonly moderated during your role in 2019 at Snapchat?

MS. BELL: Objection to form.

BY MR. HARE:

Q. You can answer.

A. I don't know that I would say commonly moderated.

I think -- sorry, could you repeat the question, please?

Q. Sure. I'll ask it in another way.

During your time at Trust and Safety, if you came across CSE content, would you routinely escalate that to your manager?

A. There was a process. Any kind of CSE content would actually be, like,

1
2 the process I remember is if there was
3 actual CSE found, that would be reported
4 to NCMEC, which is the National Center For
5 Missing and Exploited Children, and
6 potentially also law enforcement.

7 I don't know that the process,
8 like not every single CSE case would have
9 been escalated via email. So this I think
10 the escalation was maybe because it was a
11 new feature. I -- I don't know. I don't
12 know.

13 Q. Let me ask during 2017, what was
14 described to you as someone who reviewed
15 for Trust and Safety of what would
16 constitute CSE?

17 MS. BELL: Objection to form.

18 You can answer.

19 A. The definition of CSE?

20 Q. Correct.

21 A. From my understanding, it was
22 laid out by NCMEC and there's, like, A1,
23 A2, B1, B2, I believe B3 content and those
24 different categories, and I might be
25 misstating the different categories, or it

1
2 could be outdated. It's been a while
3 since I worked in Trust and Safety
4 specifically. But that refers to
5 different ages and different types of
6 nudity, sexual acts performed to or by
7 minors.

8 Q. And so it covers -- are you --
9 do you recall --

10 MR. HARE: Well, strike the
11 question.

12 Q. We'll go to the -- we'll go to
13 the -- the top email that you responded
14 and you said: A user said she is unable
15 to take down content because she is no
16 longer in the area.

17 Am I reading that correctly?

18 A. Yes.

19 Q. Was it a feature of Snapchat
20 that you had to be geographically located
21 in an area to remove content?

22 A. I don't think so.

23 Q. Do you recall why this user
24 could not report -- or, could not remove
25 content that -- for the reasons of being

1
2 outside an area?

3 A. No. I think I was just saying
4 what the user's complaining about. But
5 users often are confused about our
6 features and how they work. I don't think
7 it's a thing that you cannot take down
8 content because you're not in the area.
9 That doesn't sound familiar as a feature.

10 Q. And I know it's been a long
11 time, but do you recall how this
12 particular incident was resolved?

13 A. I don't.

14 Q. Fair enough.

15 MR. HARE: We're going to show
16 you now another document that we are
17 going to mark as Exhibit 4.

18 MR. DARBY: This is now 1209002.

19 (Snap-Oshuntola-4, email thread
20 ending 10/11/2017 (redacted), Bates
21 SNAP130902-006, was marked for
22 identification, as of this date.)

23 BY MR. HARE:

24 Q. And what are we looking at in
25 this email? Or, in this document, Ms.

1
2 Oshuntola?

3 A. Sorry, give me a second.

4 Q. Sure, take your time.

5 A. (Witness reads document.)

6 Q. Well, rather than telling me
7 what the document is, are you familiar,
8 after having reviewed the document?

9 A. I don't remember it, but yes.

10 Q. Well, turn with me, if you will,
11 to the fourth page. If you look at the
12 bottom right corner it will end in '005.

13 A. Mm-hm.

14 Q. And it appears to be the first
15 email in this thread and started on
16 Friday, October 6th, 2017 at 2 -- 8:22 a.m.
17 and that you emailed via T&S Team Leads.

18 What is TS Team Leads?

19 A. It's an email alias that just
20 included all of the team leads in the
21 Trust and Safety team.

22 Q. Is it --

23 A. Trust and Safety team leads.

24 Q. Is it like a listserv, or how
25 does that work?

1
2 A. I don't know the technical
3 definition of listserv. I think so.

4 Q. Fair enough.
5 So, when you say it's an alias,
6 can anyone who's on the TF -- TNS team
7 leads email via that email address?

8 A. Yes. So anyone who's on that
9 alias would receive the email.

10 Q. So they would receive it.
11 Could you also send it via that
12 email address as well, like it appears
13 that you did on this email?

14 A. I don't know. I don't think in
15 2017 I would have been on the team leads
16 alias.

17 Q. But I am reading that correctly
18 that it says it was sent via the TMS team
19 leads?

20 A. Yeah, that's what it says, yeah.

21 Q. So, if we look at the email: Hi
22 all. An educator followed up to ask if we
23 can gate the area around their school
24 because child porn is being shared by
25 students in Geofenced stories.

1
2 I know we asked a little bit
3 about stories and Geofenced earlier. I
4 don't know if I saw the two in the last
5 email combined.

6 Do you know what a Geofenced
7 story is?

8 A. I don't remember.

9 Q. And then in the -- if we look
10 down past the next one it says: ZD link
11 13802510.

12 What does ZD link stand for?

13 A. Zen -- that stands for Zendesk.
14 So that would be the CRM tool that was
15 used.

16 So when, as I mentioned earlier,
17 users can write in to complain or talk
18 about their -- their experience. When
19 they write in, we would, kind of, handle
20 that through Zendesk.

21 Q. So it's just a -- a mechanism
22 for reports to be generated to Snap's
23 moderation team. Is that fair?

24 A. Yes.

25 Q. And if we look down at the

1
2 message, and from your understanding in
3 drafting this email, was this the message
4 that was sent by the user who reported it?

5 A. Sorry, can you please ask the
6 question again?

7 Q. Sure.

8 If you -- if you notice that
9 there's a message and a colon and then a
10 paragraph and another sentence that is a
11 little bit lighter font.

12 Would it -- is it your
13 recollection that this is the message that
14 was submitted by the user?

15 A. I don't remember, but from the
16 way it's listed out, I would -- yeah, I
17 think it's what was in the original --

18 Q. And --

19 A. -- CMS ticket.

20 Q. Sorry, I didn't to cut you off
21 there.

22 In the message it says: The
23 recurring issue of Geofenced stories that
24 are linked in our -- to our ZIP code 68504
25 around our building. We have 2200

1
2 students in our building which makes it
3 next to impossible to have all students
4 blocked or not participate in these
5 inappropriate snaps. Our administrative
6 team has been working to shut down these
7 Geofenced stories when we were -- when we
8 are aware they exist by contacting
9 students to have them eliminated from --
10 to have them eliminate the posted snaps.
11 However, this is interfering significantly
12 with the daily operations of our building
13 as this takes continual monitoring to
14 safeguard the children within our care.
15 Our biggest concern is the child
16 pornography being post -- that is being
17 posted, screen shot, and distributed via
18 Snapchat. What can we do have to have the
19 Geofence accounts eliminated from our
20 area?

21 Is that fair?

22 A. Yes.

23 Q. And again just because I don't
24 recall seeing these words put together
25 earlier, but do you recall what a

1
2 Geofenced account is?

3 A. A Geofenced account?

4 Q. As -- as mentioned in the very
5 last sentence there.

6 A. I don't think there was such
7 thing as a Geofenced account.

8 Q. And it looks, I see in bold and
9 the email says: Should I follow up asking
10 for user names and send the crime snippet?
11 We don't have language at the moment on
12 whether or not we can gate areas.

13 Was that the user saying that,
14 or was that you?

15 A. That was me.

16 Q. Okay.

17 And what do you mean -- what did
18 you mean by that, those questions?

19 A. So, one, as I am -- had
20 mentioned earlier, there's a specific
21 process for whenever someone says that, or
22 alleges child pornography content, or CSE,
23 part of our investigation requires
24 reviewing those accounts to make sure that
25 to check for child sexual exploitation, or

1
2 CSAM, and so I -- I think it was just
3 trying to -- I was trying to understand
4 what next steps to take because there were
5 various -- there were various processes
6 that had, kind of been, kicked off by this
7 type of message being sent.

8 The second question was that,
9 like, the language that we send out to
10 users has to be approved and we didn't
11 have any messages at the time, I guess,
12 that were about area gating or ZIP codes
13 or things like that.

14 From what I recall, honestly I'm
15 not the best person to ask 'cause I don't
16 know how the feature worked technically, I
17 don't think there was any kind of -- I --
18 I feel like I remember people being
19 confused about how this feature worked
20 and, you know, kind of asking a lot about
21 writing these, kind of, baked-in
22 assumptions and being like this is not how
23 the product works.

24 I think also in terms of user
25 names, there's nothing that we can do if

1
2 someone writes in and they don't, kind of,
3 write in with a user name. We need a user
4 name to research. We can't like --
5 doesn't -- there's no system that, as far
6 as I am aware and based on this email,
7 that just providing a ZIP code would --
8 like I don't -- you can't put in Snapchat
9 as a ZIP code and come up with, again as
10 far as I'm aware, come up with an area and
11 come up with a school. So just looking at
12 this message that was sent, it's really
13 difficult to actually try and investigate
14 what the person is reporting. And in this
15 case, we would have been concerned about
16 the alleged child pornography.

17 Q. So just to make sure I
18 understand it, is it -- was it your
19 understanding that the user was asking
20 Snapchat to shut down or create a barrier
21 around their school to prevent child
22 pornography from occurring, a geographical
23 barrier?

24 A. My understanding based on what
25 I'm reading is, one, this person was

1
2 confused about how various features
3 worked.

4 They were also alleging child
5 pornography occurring on Snapchat and
6 asking to have a feature removed because
7 they found it to be a lot of work on their
8 end.

9 Q. Do you think that's a fair
10 request from the school?

11 A. In what term? In what sense?

12 Q. To ask the company that is --
13 creates a product that is being utilized
14 at their school for allegedly child
15 pornography, for asking that company to
16 take a mitigating action.

17 A. I think anyone can ask anything.

18 Q. But I'm just asking do you think
19 that's a fair request for the -- for the
20 school?

21 A. Yes.

22 Q. And if you turn with me to the
23 first page, without going through the
24 exact -- the email in full, what was the
25 ultimate resolution for this ticket or

1
2 this user-generated report?

3 A. It let them know that -- well,
4 sorry. I think, just looking through the
5 thread, I think there were multiple
6 messages sent back and forth with this
7 user. The final, or on this thread, one
8 of the messages that was sent told them
9 that custom stories can't be disabled,
10 gave them information about the terms of
11 service, asked them to provide user names,
12 how they could find a user name and how
13 they could make the report and then also
14 law enforcement because, and a lot of that
15 was because of the alleged child
16 pornography. Like I mentioned before, the
17 biggest concern from our perspective would
18 be make sure we were able to investigate
19 and if there was child pornography
20 happening, being able to report that
21 content to NCMEC and law enforcement.

22 MR. HARE: Let's go to, let's go
23 to the next document, tab 28.

24 Q. Before we move on, let me ask
25 this.

INSTRUCTIONS TO WITNESS

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it. It will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within forty-five (45) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

A C K N O W L E D G M E N T

STATE OF)
:SS
COUNTY OF)

I, DEBORAH OSHUNTOLA, hereby
certify that I have read the transcript of
my testimony taken under oath in my
deposition of February 4, 2025; that the
transcript is a true and complete record
of my testimony, and that the answers on
the record as given by me are true and
correct.

DEBORAH OSHUNTOLA