

AMENDED Exhibit 827

**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

Morgan Hammerstrom

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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

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IN RE: SOCIAL MEDIA ADOLESCENT) MDL No. 4:22-md-
ADDITION/PERSONAL INJURY) 3047-YGR
PRODUCTS LIABILITY LITIGATION)
)
This Document Relates to:)
ALL ACTIONS)
-----x

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

COORDINATION PROCEEDING) JCCP No. 5255
SPECIAL TITLE [RULE 3.550]) Judge: Carolyn B. Kuhl
) Dept. 12
SOCIAL MEDIA CASES)
-----x

CONTAINS HIGHLY CONFIDENTIAL INFORMATION

VIDEOTAPED DEPOSITION OF MORGAN HAMMERSTROM

LOS ANGELES, CALIFORNIA

WEDNESDAY, FEBRUARY 12, 2025

10:04 A.M.

Pages: 1 - 614

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

1 A. Correct.

2 Q. Okay. But both are important,
3 correct?

4 A. Correct.

5 Q. And what do you do with that
6 information -- good or bad or ugly, what do
7 you do with that information?

8 A. So generally within a research
9 study, we'll take that information. The
10 researchers on my team will come to analyze
11 and look through everything, put together a
12 report, and then either work with their
13 direct stakeholder and go through it or send
14 it out as like an e-mail of what came out of
15 the research.

16 Q. Are there ever times where
17 you're prompted, not by a qualitative or
18 quantitative study, but you're prompted by
19 somebody else within the company to research
20 something specific?

21 A. Yes.

22 Q. Okay. Have you ever been asked
23 to research a user's experience in app as it
24 relates to their mental health?

25 A. No.

1 Q. Never been asked to do that,
2 correct?

3 A. No. Correct.

4 Q. Have you ever been asked to
5 conduct research as it relates to a user's
6 experience with experiencing body image
7 issues from being on the app?

8 A. No.

9 Q. Have you ever been asked to
10 research whether a user is experience --
11 experiencing increased anxiety being on the
12 Snapchat platform?

13 A. No.

14 Q. Does it matter to you in
15 research if users are experiencing body image
16 issues as it relates to a feature on
17 Snapchat?

18 A. No. Unless that was a direct
19 ask, which it hasn't been, no.

20 Q. Otherwise -- if it's not a
21 direct ask, if a user is experiencing body
22 image issues as it relates to a feature on
23 Snapchat, that does not matter to you as
24 product research head?

25 A. No.

1 Q. Does it matter to you as the
2 product research head if users are
3 experiencing increased anxiety as it relates
4 to being on the Snapchat platform?

5 A. No. Again, this isn't anything
6 that we've ever done, so I -- I can't really
7 actually answer that.

8 Q. You've never gotten feedback
9 that a user is experiencing increased anxiety
10 from being on the Snapchat platform?

11 A. No.

12 Q. Have you ever gotten feedback
13 that a user is experiencing body image issues
14 by using features on the Snapchat platform?

15 A. No.

16 Q. Have you ever gotten feedback
17 that a user is addicted to the Snapchat
18 platform?

19 A. No.

20 Q. Never heard of that?

21 A. No.

22 Q. What types of research do you
23 conduct, like on what sort of things?

24 A. We conduct all, again, product
25 and design research for the company. So

1 Q. Okay. Okay. So the product
2 research team conducts research on 13- to
3 17-year-olds, correct?

4 A. Correct.

5 Q. Does the product research team
6 conduct research with teachers or school
7 employees?

8 A. I cannot recall if we've ever
9 talked to a teacher or school employee.

10 Q. Okay. No specific
11 recollection. Fair enough?

12 A. Yeah, no.

13 Q. Okay. Does the product
14 research team conduct research, say, specific
15 to a particular feature on Snapchat?

16 A. Yes.

17 Q. Okay. And when I say
18 "feature" --

19 A. Yes.

20 Q. -- I want to make sure we're
21 speaking the same language.

22 A. Mm-hmm.

23 Q. So what do you -- what do you
24 consider a feature on Snapchat?

25 A. A feature would be anything

1 about an interview that you gave when you sat
2 on a panel at USC and truthfully and honestly
3 gave information to the students there about
4 your work at Snapchat?

5 A. Mm-hmm. Mm-hmm.

6 Q. Yes?

7 A. Yes.

8 MS. LEYIMU: Okay. Let's pull
9 up -- let's pull up clip 13 from that
10 video.

11 (Clip of video played.)

12 BY MS. LEYIMU:

13 Q. You just -- you said in that
14 video, in that panel, that the core audience
15 at Snap was teenagers, correct?

16 A. Correct.

17 Q. Is your core audience
18 teenagers?

19 A. Again, it depends by team.

20 Q. Did you clarify that in this
21 video or did you just say, "Our core audience
22 is teenagers"?

23 A. I said, "Our core audience is
24 teenagers."

25 Q. Has anyone told you that you

1 correct?

2 MS. DEGTYAREVA: Objection.

3 Speculation.

4 THE WITNESS: If there was a
5 study on my team that looked into
6 that, then, yes, I would likely know.

7 BY MS. LEYIMU:

8 Q. Was there ever a study on your
9 team that looked into that in the almost
10 eight years that you've been working at
11 Snapchat?

12 A. I don't -- I don't know.

13 Q. Are you familiar with the
14 inclusive camera initiative?

15 A. Yes.

16 Q. What's that?

17 A. The inclusive camera initiative
18 was kicked off by a product manager on the
19 camera team to -- who was I believe an
20 engineer, to make the camera more inclusive
21 to all people.

22 Q. Okay. And were you a part of
23 collaboration in that inclusive camera study?

24 A. I was not, no.

25 Q. Okay. Were you involved in

1 "Yes, I used -- I used to have a lot, but I
2 stopped doing it. It got kind of old."

3 Do you see that?

4 A. Yes.

5 Q. Okay. If we scroll down a few
6 more cells, it says: "And did you have
7 Snapchat when you were in middle school?"

8 Do you see that?

9 A. Yes.

10 Q. And the interviewer says: "Can
11 you hear me okay?" Right?

12 A. Yes.

13 Q. Okay. And then the participant
14 answers and says what?

15 A. "Yes, I had it since first
16 grade."

17 Q. Okay. And he said, "Yes, I had
18 it" -- this interviewer says -- or this
19 participant, excuse me, says: "Yes, I had it
20 since first grade," in response to what?

21 A. The interviewer said: "Oh, I'm
22 sorry about that. Hopefully, we won't have
23 any more issues. I was asking did you have
24 Snapchat when you were in middle school."

25 Q. And he responded what?

1 A. "Yes, I had it since first
2 grade."

3 Q. Okay. So a researcher who
4 conducted this on your team of which you are
5 the head would have been aware that there
6 were Snapchat users who indicated that they
7 had used it in the first grade, correct?

8 A. Yes. If this was done by my
9 team, yes.

10 Q. Are those the types of
11 questions that your team asked to get to know
12 users on your platform?

13 A. Yes, we ask questions to users.
14 I again don't know what that study was, so I
15 don't -- I don't know.

16 Q. Okay. I believe you testified
17 that this looks like -- that looked like the
18 type of session that your team would have
19 conducted. Correct?

20 A. Correct.

21 MS. LEYIMU: All right. Let's
22 mark the next Bates ending in 2354.

23 Yeah, 2354, Exhibit 32. Thank
24 you.

25 (Exhibit No. 32 was marked for

1 that you can give the design team some
2 knowledge, right?

3 A. Correct.

4 Q. And then the design team can do
5 what they do with that knowledge. Fair
6 enough?

7 A. Yes.

8 (Exhibit No. 34 was marked for
9 identification.)
BY MS. LEYIMU:

10 Q. All right. I'm handing you
11 what has been marked as Exhibit 34.

12 A. Thank you.

13 Q. Does this appear to be the
14 social media wellness perception research?

15 A. Yes.

16 Q. Okay. If you flip to the page
17 ending in 7235.

18 A. Yes.

19 Q. This is a "Day in the Life" of
20 teens and young adults. Do you see that?

21 A. Yes.

22 Q. All right. And then it has
23 different logos for different social media
24 apps associated with different stages of a
25 young person's day. Is that fair?

1 A. Yes.

2 Q. Okay. And -- and in the
3 morning, what do you see -- do you see
4 Snapchat's logo indicated there?

5 A. Yeah, I believe this is from
6 the qualitative research around what some of
7 the apps that they might be doing at
8 different stages, so yes.

9 Q. So an app that a teen might be
10 using in the morning is Snapchat, correct?

11 A. Yeah, from the study, yes.

12 Q. It includes Snapchat. Okay.
13 And then on their commute, it
14 says: "Teens snap with friends or scroll
15 Instagram on the bus or car ride. Snapchat's
16 there." Right?

17 A. Correct.

18 Q. And then at school, it says:
19 "Teens check their phone in class unless the
20 teacher tells them not to. They use Snapchat
21 to communicate with friends and scroll
22 Instagram when they're bored." Correct?

23 A. Correct.

24 Q. That's at-school use.

25 And then at work, we've got

1 Snapchat as well listed, correct?

2 A. Correct.

3 Q. And then at bedtime, you've got
4 Snapchat listed as well, correct?

5 A. Correct.

6 Q. Okay. And then if you turn to
7 Bates ending in 7274.

8 A. Yes.

9 Q. There looks to be some
10 opportunities with the Snapchat logo next to
11 it listed, right?

12 A. Correct.

13 Q. Okay. And could you read the
14 second -- and then it says "Wellness experts
15 agree" in orange. Do you see that?

16 A. Yes.

17 Q. It's labeled "Wellness Expert
18 Guidance for Teens." Did I read that right?

19 A. Yes.

20 Q. It noted, "Well-" -- it notes:
21 "Wellness experts agree that changing
22 behavior around social media is difficult,
23 and change should come from the teen in order
24 to be lasting."

25 Do you see that?

1 Q. Clearworks is that third party,
2 yes?

3 A. Yes.

4 Q. Okay. One of the opportunities
5 listed underneath in that third column was --
6 well, the takeaway is "generally, for teens
7 and young adults, they are on social media
8 all the time," in quotations, correct?

9 A. Correct.

10 Q. All right. And what does it
11 say as opportunity that for -- in that first
12 column?

13 A. It says: "Consider giving
14 users the power to turn off notifications
15 during school hours or when they should be
16 working or studying."

17 Q. Okay. Were you involved in --
18 you can put that to the side.

19 A. Okay.

20 Q. And that was -- that was the
21 finding -- that was the opportunity listed
22 from the third party that product research,
23 the team that you head, collaborated with,
24 correct?

25 A. It could have been from them or

1 from -- it's probably from the researcher on
2 my team.

3 Q. Okay. The researcher on your
4 team might have identified the opportunity
5 that we just read, correct?

6 A. Yes.

7 Q. Is that right?

8 A. Yes, correct.

9 Q. I talked over you, so I wanted
10 to make sure that Leslie caught that.

11 Okay. So have you ever
12 communicated about notifications and users'
13 ability to disable notifications on Snapchat?

14 A. Probably, yes. I don't
15 remember specifics.

16 Q. And when you say "probably,"
17 why is that? Is that something that was sort
18 of under your wheelhouse?

19 A. No, definitely not under my
20 wheelhouse, but we've had conversations
21 around notifications.

22 Q. Okay. Let's see if we have a
23 Bates.

24 Okay. This doesn't have a
25 Bates, but I'll have to check on that.

1 Q. And is the data in the survey,
2 was that self-reported by users?

3 A. Yes.

4 Q. Was the survey designed to
5 determine whether Snap's camera or lenses
6 caused any mental health issues?

7 MS. LEYIMU: Object to the
8 form.

9 THE WITNESS: No, it did not.

10 BY MS. DEGTYAREVA:

11 Q. Did you use any control groups;
12 so, for example, people who don't use
13 Snapchat or people who don't use lenses?

14 A. No, we did not.

15 Q. Did you take into account any
16 other variables that may affect people's body
17 image?

18 MS. LEYIMU: Object to the form
19 of the question.

20 THE WITNESS: No, we did not.

21 BY MS. DEGTYAREVA:

22 Q. Did you attempt to control for
23 any variables that could have affected the
24 results of the study?

25 MS. LEYIMU: Object to the form

1 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

2 The undersigned Certified Shorthand Reporter
3 does hereby certify:

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

13 In witness thereof, I have subscribed my name
14 this date: February 26, 2025.

15
16 <%14542,Signature%>

17 LESLIE A. TODD, CSR, RPR

18 Certificate No. 5129
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