

AMENDED Exhibit 829

**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

Jonathan Brody

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No.
IN RE: SOCIAL MEDIA ADOLESCENT 4:22-MD-03047-YGR
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

This Document Relates To:

ALL ACTIONS

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
UNLIMITED JURISDICTION

Coordination Proceeding	Judicial Council
Special Title	Coordination Proceeding
(Rule 3.550)	No. 5255

SOCIAL MEDIA CASES	Judge: Carolyn B. Kuhl
	Dept. 12

VIDEOTAPED DEPOSITION OF
JONATHAN D. BRODY

Held At: Skadden Arps
2000 Avenue of the Stars
Los Angeles, California

February 5th, 2025
9:30 a.m.

Reporter:

Maureen O. Pollard, CA CSR #14449

1 would send it to all of the people that you were
2 friends with on the app?

3 A. That's right.

4 Q. 2014 is the next year we see on the
5 graph, and that's the year you arrived, correct?

6 A. Yes.

7 Q. And this third one from the bottom
8 says, "Snap Ads."

9 Do you see that?

10 A. Yes.

11 Q. And what is that referring to?

12 A. I believe that was the first
13 advertisements placed in Snapchat.

14 Q. And is advertisements within Snapchat
15 the primary way which Snapchat generates revenue?

16 A. The primary way, yes.

17 Q. Has Snap had ads ever since 2014?

18 A. Yes.

19 Q. At any time while you were at Snap did
20 you have any responsibility over Snap ads?

21 A. Not directly.

22 Q. Did you ever have any responsibility
23 over sales or marketing to brands or those types of
24 things?

25 MR. MAJOR: Objection. Vague.

1 messages disappearing by default is still there?

2 A. Yes.

3 Q. 2017, "Story Ads," it's a little more
4 than halfway up, what's that?

5 A. I believe that those were ads that
6 actually had multiple Snaps in them so that they
7 would -- you would view them as you viewed stories.

8 Q. Another mechanism for Snap to generate
9 revenue?

10 A. Yes.

11 Q. Also in 2017 is "Snap Map," correct?

12 A. Yes.

13 Q. That's a product you worked on?

14 A. Yes.

15 Q. In 2018, at the top of the list it says
16 "Discover."

17 Do you see that?

18 A. Yes.

19 Q. Can you explain at a high level what
20 Discover is?

21 A. Discover was a feature that allowed
22 publishers to have their own presence on the
23 platform to generate content.

24 Q. And content for who to view?

25 A. People that use Snapchat.

1 MR. MAJOR: Objection. Vague.

2 THE WITNESS: I think that might be
3 true, but I can't answer with certainty.

4 BY MR. GADDY:

5 Q. As you sit here today there's no other
6 product or feature within Snapchat you could point
7 me to prior to 2022 where Snap offered parental
8 controls?

9 MR. MAJOR: Objection. Vague, and lack
10 of foundation.

11 THE WITNESS: Again, I can't say that
12 for sure.

13 BY MR. GADDY:

14 Q. Right. So the answer is, correct,
15 there is no other product or feature that you can
16 point me to as you sit here today prior to 2022
17 where Snap offered parental controls?

18 MR. MAJOR: Objection. Vague, asked
19 and answered, lack of foundation.

20 THE WITNESS: My answer is that I can't
21 say that for sure.

22 BY MR. GADDY:

23 Q. Flip, if you would, please, back toward
24 the front to Bates ending 550. You should be
25 looking at a slide that says "Over 750 million

1 monthly active users."

2 Do you see that?

3 A. Yes.

4 Q. Why is the number of monthly active
5 users significant to where it would be included in
6 an Investor Day PowerPoint?

7 MR. MAJOR: Objection. Lack of
8 foundation.

9 THE WITNESS: I think it's just an
10 general indication of how many users the
11 application reaches.

12 BY MR. GADDY:

13 Q. And why is it important, the number of
14 users that the application reaches?

15 A. It is an indication of how valuable the
16 product is, how many people advertisers can reach,
17 how many people can communicate with each other
18 across the platform, among other things.

19 Q. It also says on here that "Snapchat
20 reaches 90 percent of the 13- to 24-year-old
21 population and 75 percent of the 13- to 34-year-old
22 population in over 20 countries."

23 Do you see that?

24 A. Yes.

25 Q. Do you agree that in the US Snapchat

1 was a very popular application?

2 A. Yes.

3 Q. Do you agree that Snapchat in the US
4 was a very popular application with teenagers?

5 MR. MAJOR: Objection. Vague.

6 THE WITNESS: I believe you could say
7 that, yes.

8 BY MR. GADDY:

9 Q. If you flip the page, you should see a
10 slide that says "Strong Growth in Our Community."

11 Do you see that?

12 A. Yes.

13 Q. And it says "383 Million Daily Active
14 Users."

15 Do you see that?

16 A. Yes.

17 Q. Can you explain why there would be such
18 a difference in the number of daily active users,
19 383 million, versus the monthly active users, which
20 was 750 million?

21 A. Some people only use the product a
22 subset of days, not every day of the month.

23 Q. Okay. And that's why you'd see higher
24 number for the monthly users?

25 A. Yes.

1 Q. And do you see the graph that's
2 presented on this page? And if you look at the key
3 at the bottom it has North America in yellow, and
4 you can then see the number of daily active users
5 presented on this graph from 80 million starting at
6 the beginning of 2019 through 100 million at the
7 beginning of 2023?

8 A. Yes.

9 Q. Did you have an idea when you were at
10 Snap of approximately how many teenagers in the US
11 were using Snapchat?

12 A. I had a vague high-level understanding.

13 Q. And what was that?

14 A. I believe it was kind of this
15 percentage based, so this kind of 90-percent-plus
16 number.

17 Q. 90-plus percent of teenagers were using
18 Snapchat?

19 A. That is what I understood that to mean.

20 Q. Safe to say that's tens of millions of
21 teenagers in the US were using Snapchat?

22 A. I don't know the exact number.

23 Q. But fair to say it's tens of millions?

24 MR. MAJOR: Objection. Asked and
25 answered.

1 THE WITNESS: I don't know how many
2 teenagers there are in the US.

3 BY MR. GADDY:

4 Q. Flip towards the back of this one. On
5 Bates ending 4594, there's a slide entitled
6 "Long-Term Value Creation."

7 Have you got it?

8 A. Yes.

9 Q. And you see the very first entry there
10 says, "Path to 1 billion monthly active users over
11 the next two to three years."

12 Do you see that?

13 A. Yes.

14 Q. And again that's -- that was a goal
15 that Snap had, to increase the use of its app from
16 the 750 million monthly active users it had at the
17 time all the way up to over a billion, correct?

18 A. I believe so.

19 Q. And the reason for that goal would be
20 some of the things that you told us earlier, to show
21 the popularity of the app, to show the reach that
22 advertisers could have, and to show the amount or
23 the type of revenue that could be generated from
24 Snapchat?

25 MR. MAJOR: Objection. Compound, lack

1 of foundation.

2 THE WITNESS: And also to bring a
3 product that we thought was valuable for
4 people to more people.

5 BY MR. GADDY:

6 Q. The fourth entry down next to the light
7 bulb says, "Innovate to drive growth in content
8 engagement."

9 Do you see that?

10 A. I do.

11 Q. And one of the things that Snap looked
12 at was not only how many individuals got on the app
13 on either a daily or a monthly basis, but was how
14 much time those individuals spent on the app,
15 correct?

16 A. Yes.

17 Q. And from a revenue-generation
18 perspective, in kind of a benefit to advertisers
19 perspective, the longer individuals stayed on the
20 app, that was a better thing for Snap, correct?

21 MR. MAJOR: Objection. Compound, lack
22 of foundation.

23 THE WITNESS: Oftentimes. Not always.

24 BY MR. GADDY:

25 Q. Sorry, I'm not following.

1 The question is, from a
2 revenue-generation perspective and from the
3 perspective of touting the advantages of advertising
4 on Snap to advertisers, the longer individuals
5 stayed on the platform, that was better for Snap,
6 correct?

7 MR. MAJOR: Objection. Compound, and
8 asked and answered.

9 THE WITNESS: It's more nuanced than
10 that. I think as a general measure, fairly
11 effective, but it's not about how much time
12 as much as it's about, you know, how
13 they're spending that time and the content
14 that they watch.

15 But, yes, generally I think that is a
16 measure that could measure the
17 effectiveness for advertisers.

18 BY MR. GADDY:

19 Q. You agree that the more monthly active
20 users on Snap the more revenue Snap is going to
21 generate, generally?

22 A. Not necessarily, but generally those
23 things would move together.

24 Q. Likewise, the more time spent on the
25 application by its users, the more revenue Snap is

1 going to generate, true?

2 A. Again, not necessarily, and not in all
3 cases, but generally.

4 Q. Is it also your general understanding
5 that the more revenue Snap generates, the higher the
6 stock price is going to go?

7 MR. MAJOR: Objection. Foundation,
8 speculation.

9 THE WITNESS: It's hard to say what the
10 stock price is going to do, and certainly
11 not in all cases, but generally, yes.

12 BY MR. GADDY:

13 Q. Mr. Brody, I'm happy to keep going.
14 We've been going about an hour. Whenever you want
15 to take a break, let me know.

16 A. I'm okay. Thank you.

17 MR. MAJOR: Take like two minutes?

18 MR. GADDY: Sure.

19 THE VIDEOGRAPHER: We are now going off
20 the record, and the time is 10:35 a.m.

21 (Whereupon, a recess was taken.)

22 THE VIDEOGRAPHER: We are now going
23 back on the record, and the time is
24 10:42 a.m.

25 ///

1 understanding that the US market was the most
2 valuable market for Snap?

3 MR. MAJOR: Objection. Vague, and lack
4 of foundation.

5 THE WITNESS: I was broadly aware that
6 that was a valuable market for us.

7 BY MR. GADDY:

8 Q. I mean, according to this chart it's
9 not quite but almost twice the value of the next
10 closest market, correct?

11 A. Yes.

12 Q. Was that consistent with your
13 understanding that the US market -- not just that it
14 was a valuable market, but that it was the most
15 valuable market and significantly the most valuable
16 market for Snap?

17 MR. MAJOR: Objection. Compound, lack
18 of foundation.

19 THE WITNESS: I'm not sure I was
20 specifically aware of the exact details of
21 how valuable it was compared to the next
22 best, next most valuable.

23 BY MR. GADDY:

24 Q. And if you flip the page one more time,
25 you see a chart that says "Monthly Average Revenue

1 Per User by Country."

2 Do you see that?

3 A. Yes.

4 Q. And it lists -- again, just looking at
5 the first 12 months post-registration, and you see
6 that once again the US is at the top of the monthly
7 average revenue per user.

8 Do you see that?

9 A. Yes.

10 Q. Flip about three slides and go to slide
11 70, and you'll see a slide entitled "US Monthly
12 Average Revenue Per User by Age Group."

13 Do you see that?

14 A. Yes.

15 Q. And again this is just looking at the
16 first 12 months post-registration.

17 Do you see that?

18 A. Yes.

19 Q. And according to this chart, the most
20 valuable age group to Snap from the perspective of
21 annual revenue per user was the 13- to 17-year-old
22 age group.

23 Do you see that?

24 MR. MAJOR: Objection.

25 Well, are you just asking him if the

1 document says that?

2 MR. GADDY: Yeah.

3 THE WITNESS: I believe this is showing
4 that by month 12 the ARPU by age group for
5 13- to 17-year-olds is higher than that of
6 other demographics.

7 BY MR. GADDY:

8 Q. Sure. And that's a fair clarification.

9 13 to 17 is not the highest the entire
10 time, correct?

11 A. Correct.

12 Q. But by month 12, the 13- to 17-year-old
13 demographic is the most valuable demographic
14 age-wise to Snap, true?

15 MR. MAJOR: Objection. Vague, lack of
16 foundation.

17 THE WITNESS: This suggests it's the
18 highest ARPU by that point.

19 BY MR. GADDY:

20 Q. When you say "ARPU," you're meaning
21 annual revenue per user?

22 A. Yes.

23 Q. Was that consistent with your
24 understanding while you were at Snap that the 13- to
25 17-year-old demographic was the most valuable over a

1 sure. I suppose that that is somebody who
2 Snap could create monetary value from at
3 that age instead of later.

4 BY MR. GADDY:

5 Q. Sure. A user that is onboarded by Snap
6 at age 13 is going to produce revenue for Snap at
7 age 13, 14, 15, 16, 17, and 18, and then forward
8 assuming they keep using the platform, as opposed to
9 a user that Snap doesn't onboard until they're
10 18 years of age and they don't have the benefit of
11 that earlier revenue, correct?

12 MR. MAJOR: Objection. Compound,
13 vague.

14 THE WITNESS: That seems generally
15 correct.

16 BY MR. GADDY:

17 Q. And, I mean, from a monetary
18 perspective and a revenue-generation perspective,
19 it's to Snap's benefit to onboard users as early as
20 possible to maximize the amount of time that a user
21 is in this 13 to 17 demographic bracket where they
22 are, as we saw in the previous charts, the highest
23 revenue-producing demographic on Snapchat, correct?

24 MR. MAJOR: Objection. Vague,
25 compound.

1 THE WITNESS: That seems generally
2 correct.

3 BY MR. GADDY:

4 Q. Looking from the perspective of the
5 lifetime revenue that is likely to be generated by a
6 user of Snapchat, the earlier Snap is able to
7 onboard that user, the more revenue Snap is likely
8 to generate from that user, correct?

9 MR. MAJOR: Objection. Lack of
10 foundation, vague.

11 THE WITNESS: I believe that's what
12 these charts indicate.

13 BY MR. GADDY:

14 Q. You can put that one aside.

15 In fact, because of the earning
16 potential from the youngest users of Snapchat, fair
17 to say that onboarding the youngest users,
18 13-year-olds, was the most critical aspect of
19 onboarding users at Snapchat?

20 MR. MAJOR: Objection. Lack of
21 foundation, and vague.

22 THE WITNESS: I can't say that
23 specifically.

24 BY MR. GADDY:

25 Q. You could say that from a general

1 allowed people to do that.

2 Q. Sure. My question is about on the
3 Snapchat app --

4 A. I'm not sure.

5 Q. -- not at the operating system level.
6 Are you aware of any product or product
7 feature that ever has existed on Snapchat that
8 allowed a 13 to 17-year-old kid to have time limits
9 set for them for how long they could spend on the
10 app?

11 MR. MAJOR: Objection. Vague.

12 THE WITNESS: I can't say for sure.

13 BY MR. GADDY:

14 Q. Are you ever aware of Snapchat itself
15 through its app instituting any time -- instituting
16 any time limits or limitations on the number of
17 times the app could be opened on a daily basis by a
18 13 to 17-year-old user?

19 MR. MAJOR: Objection. Vague and
20 compound.

21 THE WITNESS: I can't say for sure.

22 BY MR. GADDY:

23 Q. Are you aware of any product or feature
24 that Snapchat ever offered on its application that
25 would provide a warning or a notification to kids 13

1 to 17 that they were spending too much time on the
2 application?

3 MR. MAJOR: Objection. Vague again.

4 THE WITNESS: I don't believe so. I
5 can't say for sure.

6 BY MR. GADDY:

7 Q. Are you aware of any product or product
8 feature ever offered by Snapchat on the Snapchat
9 application that would provide any type of warning
10 about how spending excessive time on the application
11 could be harmful?

12 A. I can't say for sure.

13 Q. If you flip to the Bates ending 185.
14 This is the continuation of that section about the
15 younger users, and you see number 5 says, "This age
16 cohort is also very valuable for advertisers."

17 Do you see that?

18 A. I do.

19 Q. And was that consistent with your
20 understanding that the younger demographic, the 13
21 to 17-year-old teenagers, was a very valuable
22 demographic for advertisers?

23 A. Is that -- I'm not sure that that is
24 the cohort this is referring to from just this one
25 line.

1 Q. If you go back to the first page of the
2 document, this is number 5 --

3 A. I see it.

4 Q. -- under "Maintaining deep penetration
5 of younger demos in established markets," right?

6 A. Yes.

7 Q. And that's the one where we saw the
8 bullet point talking about winning with
9 13-year-olds, right?

10 A. Yes.

11 Q. And it's the one where it said, "This
12 generation can't live without our app."

13 Correct?

14 A. Yes.

15 Q. And if we go back to where we are on
16 number 5, it says, "This age cohort" -- again
17 referring to the youngest demographic -- "is also
18 very valuable for advertisers."

19 Right?

20 A. Yes.

21 Q. It says, "Snapchat Generation" --
22 what's that?

23 A. I can't say for sure, but I imagine
24 that is the generation that is -- that uses Snapchat
25 most.

1 Q. "Snapchat Generation has [\$2 trillion]
2 in purchasing power, making up over [40 percent] of
3 global consumers."

4 Do you see that?

5 A. Yes.

6 Q. And that's what Snap is thinking about
7 when they're saying that this group of kids, the
8 teenagers, is the cohort that's very valuable to
9 advertisers, correct?

10 MR. MAJOR: Objection. Lack of
11 foundation, calls for speculation.

12 THE WITNESS: Yeah, I'm not sure. I
13 can't say for sure.

14 BY MR. GADDY:

15 Q. And fair to say that over the years
16 Snap has designed, made different products or
17 features of Snapchat which are designed to increase
18 the number of users of the platform, fair?

19 A. I think it's more nuanced than that.
20 The primary reason we designed features was to make
21 the application more valuable, which would sometimes
22 and often indirectly lead to more people wanting to
23 use that product and get that value from it.

24 Q. Sure.

25 And one of the things that some of the

1 A. I believe there were products offered
2 to that end, yes.

3 Q. When you say "products offered," you
4 mean products offered by Snap, correct?

5 A. Yes.

6 Q. I show you what we'll mark as Exhibit
7 Number 6. This is P-SNAP-0660.

8 (Whereupon, Exhibit Snap-Brody-6 was
9 marked for identification.)

10 BY MR. GADDY:

11 Q. And you can tell me if I'm wrong, but
12 my understanding is this document is a Quip. Are
13 you familiar with Quips?

14 A. Yes.

15 Q. Can you give me at a high level an
16 understanding of what a Quip is?

17 A. It was another kind of collaborative
18 document-type product like Google Docs.

19 Q. And what did Snap or you specifically
20 use Quips for?

21 A. Oftentimes it was used to outline a new
22 product or feature's functionality, to communicate
23 it to those that would need to help develop it.

24 Q. And if you flip the page and look
25 inside this one, this is from October 19, 2027 --

1 or, excuse me, 2017.

2 Do you see that at the top?

3 A. Yes.

4 Q. And the title of this Quip is

5 "[Cheetah] Discover Feed User Spec."

6 Do you see that?

7 A. Yes.

8 Q. First tell me what Cheetah is and what
9 that means.

10 A. Cheetah was a project name for a
11 redesign of the application.

12 Q. Give me kind of a high level of what
13 happened in the Cheetah redesign and kind of the
14 outcome of the Cheetah redesign.

15 MR. MAJOR: Objection. Vague.

16 THE WITNESS: A lot happened in the
17 Cheetah redesign. It was a while ago and I
18 can't specifically recall the details.

19 BY MR. GADDY:

20 Q. Is that the one where Stories went away
21 as a toggle on the bottom menu?

22 A. To my recollection, I believe Stories
23 moved from the right side of the app to the left
24 side of the app as part of this change, among many
25 other changes.

1 Q. Okay. The title is "[Cheetah] Discover
2 Feed User Spec." And then it says "Feature
3 Overview."

4 Do you see that?

5 A. Yes.

6 Q. It says, "Create a flexible and focused
7 stories design. An infinite feed of ranked,
8 interesting content."

9 Correct?

10 A. Yes.

11 Q. And you can go back and look at it if
12 you like, but my memory is that when we looked at
13 that product timeline feature on that graph, that
14 Discover went live in 2018. Does that sound about
15 right to you?

16 A. I recall that being what it showed on
17 that sheet. My memory of Discover was actually that
18 it launched in its first iteration in 2014 or 2015.

19 Q. Okay. Okay.

20 A. It evolved. Over the years the name
21 meant different things.

22 Q. Sure. Okay. Can you -- I appreciate
23 that.

24 Can you walk me through kind of the
25 history of what you now think of as Discover as far

1 as what it looked like when it launched and how it
2 may have changed over time?

3 A. Yeah. I have a vague recollection of
4 this stuff, so at a high level the initial iteration
5 of Discover had a finite number of publishers that
6 were available that were creating content on some
7 cadence.

8 Over time the number of publishers
9 offered increased, and the types of publishers
10 broadened, and some users and creators on the
11 platform showed up in Discover.

12 The UX and the interface evolved over
13 that period of time as well.

14 Q. In this document the next entry says
15 "Feature Goals."

16 Do you see that?

17 A. Yes.

18 Q. And the goals for -- within this
19 particular document was, "Deeper engagement and more
20 time spent with public stories."

21 Do you see that?

22 A. Yes.

23 Q. And engagement and time spent are two
24 of the factors that we saw earlier in that revenue
25 formula, correct?

1 A. Yes.

2 Q. It goes on to say, "Drive an endless
3 scrolling experience of interesting content."

4 Do you see that?

5 A. Yes.

6 Q. And you agree that one of the goals of
7 this particular project that were being worked on
8 for Discover was to drive endless scrolling?

9 MR. MAJOR: Objection. Vague,
10 foundation, speculation.

11 THE WITNESS: I'm not sure what "drive"
12 means, but according to this document, that
13 was outlined as a goal.

14 BY MR. GADDY:

15 Q. In your own words can you tell us what
16 "endless scrolling" means?

17 A. I assume this means an experience where
18 you can scroll endlessly.

19 Q. Do you have an understanding of why
20 that would drive -- or why that would assist in the
21 goals that are listed there as far as deeper
22 engagement and more time spent?

23 MR. MAJOR: Objection. Vague,
24 compound, foundation.

25 THE WITNESS: Seems like if a user does

1 of, you know, feedback channels, voice of the
2 customer reports, things of that like.

3 Q. Are you aware of any qualitative A/B
4 testing that was done for the feature in this
5 document that we were talking about as far as
6 driving the endless scrolling experience?

7 A. I don't have specific recollection of
8 the feedback or what steps were taken. I do have
9 recollection that there was feedback from users for
10 this.

11 Q. And do you recall whether or not Snap
12 solicited feedback specifically on the areas of
13 addictive use, compulsive use, or those types of
14 topics?

15 A. I don't recall specifically.

16 Q. Do you recall whether or not Snap did
17 any research as it relates to this specific feature
18 into the impact that it may have on schools or what
19 it might do to children and their attention while at
20 school?

21 MR. MAJOR: Objection. Compound,
22 vague.

23 THE WITNESS: I don't recall
24 specifically.

25 ///

1 Q. And tell me really quickly what is --
2 it says "Channel #Product-Feedback." Is that kind
3 of like a group Slack message?

4 A. Yes.

5 Q. And who would be members of the product
6 feedback channel?

7 A. I believe anybody at Snap, any team
8 member, could be a member of this. I think it was
9 an open channel.

10 Q. And what was kind of your general
11 understanding of the purpose of the product feedback
12 channel?

13 A. For people to provide feedback on the
14 product.

15 Q. "Product" being Snapchat?

16 A. Yes.

17 Q. Flip if you would, please, to the Bates
18 ending 939. And there's a message from [REDACTED]
19 Let me know when you've got it.

20 A. Yep.

21 Q. And who is [REDACTED]

22 A. I'm not sure.

23 Q. She says, "I saw this Tweet and thought
24 I'd share."

25 Do you see that?

1 A. Yes.

2 Q. The images are embedded so we printed
3 the image separately. It's at the back of the
4 document. Let's go to that and we can see the Tweet
5 that she shared. You should have it at the very
6 back where you can read the whole thing so it's not
7 cut off.

8 Have you got it?

9 A. Yes.

10 Q. The Tweet she shares says, "I think
11 snapchat filters can influence body dysmorphia
12 because it literally changes your eyes/nose/face
13 shape."

14 Do you see that?

15 A. Yes.

16 Q. Fair to say that she's correct, that
17 Snapchat offered lenses or filters in the beauty or
18 beautification section that would change the
19 appearance of the Snapchatter's eyes and/or nose
20 and/or face shape?

21 MR. MAJOR: Objection. Vague.

22 THE WITNESS: The point of many of the
23 filters were to change the appearance,
24 costume, shape, etcetera, of users, yeah.

25 ///

1 BY MR. GADDY:

2 Q. Sure. And obviously I know there's
3 silly lenses that will change those types of facial
4 features in unrealistic and silly ways, but I'm
5 asking specifically about the beauty or
6 beautification filters.

7 They would also augment eyes, nose,
8 face shape in ways that would make the Snapchatter
9 appear, quote-unquote, more beautiful, true?

10 MR. MAJOR: Objection. Vague.

11 THE WITNESS: I don't recall
12 specifically what was categorized as
13 "beauty." The things that I recall being
14 deemed beauty related would have been the
15 skin smoothing and the different lighting
16 options. I don't know that that was the
17 extent of it, but that's what I recall.

18 BY MR. GADDY:

19 Q. It goes on to say, "if you're
20 constantly using these filters you start hating your
21 actual appearance because ur used to people
22 complementing your false features ya get me?"

23 Do you see that?

24 A. Yes.

25 Q. Does that concept that is being

1 expressed by this Snapchat user make sense to you?

2 MR. MAJOR: Objection. Vague.

3 THE WITNESS: I understand what they're
4 getting at.

5 BY MR. GADDY:

6 Q. Do you have an appreciation that that
7 can be a real mental health concern?

8 MR. MAJOR: Objection. Vague.

9 THE WITNESS: I'm not sure I understand
10 that question, an "appreciation" for that.

11 BY MR. GADDY:

12 Q. What she's saying is if you're
13 constantly using these filters you start hating your
14 actual appearance because you're used to people
15 complementing your false features. My question is,
16 do you appreciate that as a legitimate mental health
17 concern or problem?

18 MR. MAJOR: Objection. Vague, lack of
19 foundation, improper opinion testimony.

20 THE WITNESS: I think that could
21 happen, and if that were happening, it
22 would not be ideal.

23 BY MR. GADDY:

24 Q. And I'm asking you because in this
25 period of time in 2020, I think you're the head of

1 page that says "Percentage of Snap Senders Having
2 Streaks by Age."

3 Do you see that?

4 A. Yes.

5 Q. And do you see here, consistent with
6 what we saw on the earlier slide, that the highest
7 percentage is those in the 13 to 17-year-old age
8 bracket?

9 A. Yes.

10 Q. And is that consistent with your
11 understanding that the younger users were the more
12 prominent users of Snapstreaks?

13 A. Again, I think there's some incidental
14 usage of Snapstreaks here. They were the more
15 frequent communicators in general which would lead
16 to more of them having streaks.

17 Q. That makes sense.

18 While we're kind of talking about the
19 concepts of Snapchat use by teenagers in the context
20 of schools, are you aware of Snap ever taking any
21 action or implementing any type of product design
22 feature that would have disallowed the use of
23 Snapchat on school property?

24 MR. MAJOR: Objection. Vague,
25 foundation.

1 THE WITNESS: I'm not sure.

2 BY MR. GADDY:

3 Q. Are you aware of that ever happening?

4 A. I'm not aware.

5 Q. Are you aware of Snap ever rolling out
6 a design component or design feature that would have
7 prevented the use of Snapchat by school-aged
8 children during school hours?

9 A. Not that I'm aware of.

10 Q. As to the first of those two questions
11 that I asked about, and disallowing the use of
12 Snapchat on school property, Snap had the ability to
13 understand locations as far as where its users were,
14 correct?

15 A. Sometimes, in some cases.

16 Q. I mean, you were involved in the Snap
17 Map feature, correct?

18 A. Yes.

19 Q. And that was a feature that would
20 display a map and allow Snap users to see where they
21 were and where their friends were, and those types
22 of things, correct?

23 A. Those that opted into granting the
24 application location permission and then those that
25 opted into sharing their location with friends would

1 appear there, yes.

2 Q. And was there technology that -- let me
3 ask a different question first.

4 As the Snap Map kind of evolved over
5 time, in addition to users just being able to see
6 where their friends were on the map, they could also
7 see locations on the map, correct?

8 MR. MAJOR: Objection. Vague.

9 THE WITNESS: What do you mean by

10 "locations"?

11 BY MR. GADDY:

12 Q. Sure.

13 Like they could see the local coffee
14 shop on the corner and click on the coffee shop?

15 A. Sure, yes.

16 Q. And maybe this wasn't immediately a
17 feature, but once they clicked on that coffee shop
18 they could then see Snaps or Stories that were
19 either put out by the coffee shop or tagged by folks
20 while they were at this coffee shop and things like
21 that, correct?

22 A. Yes.

23 Q. And Snap had the technology available
24 to kind of geolocate and geofence different areas
25 that it would display on the map, like the coffee

1 shop in that example?

2 MR. MAJOR: Objection. Vague,
3 compound.

4 THE WITNESS: Yes.

5 BY MR. GADDY:

6 Q. Okay. And fair to say that another
7 location that you could view or see on the map would
8 be schools, middle schools or high schools?

9 A. I'm not sure whether or not that was
10 presented on the map.

11 Q. Okay. Are you aware of Snap ever doing
12 anything with its geolocation or geofencing
13 capabilities to prevent access to Snapchat by
14 individuals that were on school properties during
15 school hours?

16 MR. MAJOR: Objection. Vague.

17 THE WITNESS: Not that I'm aware of.

18 BY MR. GADDY:

19 Q. I show you what I'll mark as Exhibit
20 Number 24. This is P-SNAP-0686.

21 (Whereupon, Exhibit Snap-Brody-24 was
22 marked for identification.)

23 BY MR. GADDY:

24 Q. And this is another document from your
25 custodial file. The file name is "Streak Restore -

1 CERTIFICATE OF COURT REPORTER

2
3 I, MAUREEN O'CONNOR POLLARD,
4 Registered Diplomate Reporter, CSR No.
5 14449 for the State of California, the
6 officer before whom the foregoing
7 deposition was remotely taken, do
8 hereby certify that the foregoing
9 transcript is a true and correct record
10 of the testimony given; that said
11 testimony was taken by me
12 stenographically and thereafter reduced
13 to typewriting under my direction; and
14 that I am neither counsel for, related
15 to, nor employed by any of the parties
16 to this case and have no interest,
17 financial or otherwise, in its outcome.

18 Dated this 12th day of February,
19 2025.

20 <%21527,Signature%>
21 _____

22 MAUREEN O'CONNOR POLLARD

23 CSR No. 14449
24
25