

AMENDED Exhibit 847

**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

Jeremy Voss

1

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)
-----x

)
THIS DOCUMENT RELATES)
TO ALL ACTIONS)
)
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CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF JEREMY VOSS

PALO ALTO, CALIFORNIA

APRIL 4, 2025

10:05 A.M.

Job No. MDLG7280759

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

1 another exhibit here. This will be
2 tab 9, which we will mark as
3 Exhibit 8.

4 (Exhibit No. 8 was marked for
5 identification.)

6 BY MR. FREEDMAN:

7 Q. And, sir, before -- I'm going
8 to give you a moment to look at the document.
9 Before we do, can we go to that last page
10 again.

11 A. Yes.

12 MS. MENY: Last page of this
13 document?

14 MR. FREEDMAN: Yeah, this slip
15 sheet.

16 BY MR. FREEDMAN:

17 Q. Sir, you're listed as a
18 custodian, right, sir?

19 A. Yes.

20 Q. The author is Mofette
21 Nathanson, LLC. Do you see that?

22 A. I see that.

23 Q. Who is that?

24 A. I think it's a public research
25 group, i.e., this is a document that would

1 have been produced publicly, not -- not for
2 Snap.

3 Q. Okay. And then it says the
4 create date is April 2018, right?

5 MS. MENY: He's talking about
6 on the slip sheet.

7 THE WITNESS: Yes.

8 BY MR. FREEDMAN:

9 Q. And that's about a year after
10 the power users study we were just looking
11 at, right?

12 A. Yes.

13 Q. Okay. Why don't you take a
14 look at that document and let me know when
15 you've familiarized yourself.

16 A. (Peruses document.)

17 Q. How are you doing, sir?

18 A. Just one moment. (Peruses
19 document.) Okay.

20 Q. Sir, the first page of this
21 document on Bates 368, up top it says: "Snap
22 Focus Group Part 2: Who Were the Beta
23 Testers?"

24 You see that, right?

25 A. Yes.

1 Q. And under the Summary it says:

2 "One year ago as Snap was gearing up to go
3 public, we hosted focus groups with three
4 distinct cohorts, middle school students,
5 high school students, and young college
6 graduates, to understand what Snap meant to
7 its most ardent users."

8 I read that correctly, right?

9 A. Yes.

10 Q. It continues: "Given the
11 popularity of these focus groups and the
12 recent uproar around Snap's app redesign, we
13 thought it would be topical to run these
14 groups again to check the pulse of Snap's key
15 demos."

16 I read that correctly?

17 A. Yes.

18 Q. Sir, have you ever seen this
19 research?

20 A. I don't remember this.

21 Q. Any idea why you would be
22 listed as the custodian for this document?

23 A. I guess it was shared with me
24 at some point.

25 Q. Any idea why you would be the

1 thought it would be topical to run these
2 groups again to check the pulse of Snap's key
3 demos."

4 I read that correctly, right?

5 A. Yes.

6 Q. So, sir, we can agree that this
7 research is indicating that middle school
8 students, high school students, and young
9 college graduates are Snap's, quote, key
10 demos, right?

11 MS. DEGTYAREVA: Objection.

12 Vague, speculation, foundation.

13 MS. MENY: Also misstates the
14 document. Join.

15 THE WITNESS: That is what this
16 external researcher says, but I don't
17 think that Snap would agree with that.
18 I mean the 13- to 17-year-old group is
19 only four -- four years of people. So
20 we have -- it represents a small
21 minority of the people on Snap's
22 platform.

23 BY MR. FREEDMAN:

24 Q. Mr. Voss, is it your testimony
25 that Snap was not aware that 13- to

1 17-year-olds were its most active users?

2 MS. DEGTYAREVA: Objection.

3 Vague, speculation, foundation.

4 MS. MENY: Join.

5 THE WITNESS: Yeah, I -- I
6 don't know. It would depend on what
7 features we're talking about and I
8 would have to see the data.

9 BY MR. FREEDMAN:

10 Q. Okay. Well, why don't we jump
11 to the third paragraph. Can you read for me
12 the first sentence of that paragraph.

13 A. "Our second takeaway is the
14 fact that while Snapchat retains its
15 stranglehold on the middle school cohort,
16 Instagram has clearly become a more
17 significant contender for the high school and
18 post-college cohorts' time, with it being
19 viewed increasingly as a replacement
20 platform, excluding direct messaging
21 functionality."

22 Q. You agree that this research
23 suggested that Snapchat had a stranglehold on
24 middle school cohort. Right?

25 MS. DEGTYAREVA: Objection.

1 Vague, foundation and speculation.

2 MS. MENY: Join.

3 THE WITNESS: That's what this
4 sentence says.

5 BY MR. FREEDMAN:

6 Q. And so you're asking this jury
7 to believe that Mofette Nathanson knew that
8 Snapchat had a stranglehold on the middle
9 school cohort, but Mr. Voss did not know
10 that.

11 MS. MENY: Objection.
12 Speculation, foundation, misstates the
13 document, vague.

14 THE WITNESS: Yeah, I think
15 Moffette Nathanson --

16 MS. DEGTYAREVA: Join.

17 THE WITNESS: -- thinks that
18 but doesn't have access to Snapchat's
19 data. And I -- I wouldn't have
20 characterized that that way at all.
21 It was highly -- a number of other
22 messaging apps that that age group
23 used a lot.

24 BY MR. FREEDMAN:

25 Q. Well, let's look at some of the

1 ways that these groups used Snapchat.

2 If we turn to the Bates ending
3 369.

4 That middle school group, it
5 reads: "This year the middle school group
6 consisted of eighth graders who were 13- and
7 14-year-olds. Most participants listed
8 Snapchat and Instagram as their top two apps.
9 Other apps within the top five were
10 Pinterest, VSCO, YouTube, Spotify and gaming
11 apps like Righter."

12 I read that correctly, right?

13 A. Yes.

14 Q. And if we flip to the next page
15 ending 370, right at the top of the page it
16 discusses streaks, right, sir?

17 A. Yes.

18 Q. Why don't you tell -- read what
19 it says in that paragraph:

20 A. "Streaks, which this group
21 loved last year, were only used by a few this
22 year and loathed by the rest. Most found
23 streaks to be so annoying and said they could
24 be stressful to keep going. Users felt that
25 maps felt really creepy and can also

1 unintentionally make people feel left out."

2 Q. And that was your understanding
3 of the way in which streaks impacted middle
4 school users, that it made them feel
5 stressed, right?

6 MS. DEGTYAREVA: Objection.

7 Vague. Misstates the document,
8 speculation, and foundation.

9 MS. MENY: Join. Also
10 misstates his testimony.

11 THE WITNESS: That is not my
12 understanding, no.

13 BY MR. FREEDMAN:

14 Q. Okay. Let's turn to the high
15 school group, the second paragraph here. It
16 reads: "This group reported deep engagement
17 with Snapchat (all reported Snapchat as one
18 of their top two apps), but also said
19 Snapchat was stressful and distracting."

20 Sir, do you have any reason to
21 believe that these high school students were
22 lying?

23 MS. DEGTYAREVA: Objection.

24 Vague, speculation, foundation.

25 MS. MENY: Join. Also vague

1 and ambiguous.

2 THE WITNESS: I -- I don't know
3 the conversations or how many
4 conversations they had. I don't know
5 anything about the research they did
6 for this paper.

7 BY MR. FREEDMAN:

8 Q. So no reason to think that what
9 is reported here is inaccurate?

10 MS. DEGTYAREVA: Objection.
11 Vague, speculation, foundation,
12 misstates the testimony.

13 MS. MENY: Join.

14 THE WITNESS: No, I don't think
15 that they're trying to be inaccurate.
16 No.

17 BY MR. FREEDMAN:

18 Q. It continues on. Can you read
19 for me the next sentence?

20 A. "One participant remarked that
21 its addictiveness had affected her academic
22 performance. Although this group uses
23 Snapchat often" --

24 Q. We're just going --

25 A. You want me to stop there.

1 Q. Yeah, we're just going to read
2 that next sentence. Can you do that one more
3 time for the one participant sentence.

4 A. "One participant remarked that
5 its addictiveness had affected her academic
6 performance."

7 Q. Sir, you would agree with me
8 that Snap was aware that Snapchat was
9 addictive for high school age children.
10 True?

11 MS. DEGTYAREVA: Objection.

12 Vague, speculation, foundation --

13 THE WITNESS: No.

14 MS. DEGTYAREVA: -- misstates
15 the document.

16 THE WITNESS: Sorry.

17 MS. MENY: Join.

18 THE WITNESS: No.

19 BY MR. FREEDMAN:

20 Q. Mr. Voss, did you ever conduct
21 any analysis or tests on the impact that
22 Snapchat had on the academic performance of
23 high school aged children?

24 MS. MENY: Objection. Vague.

25 THE WITNESS: Not that I

1 recall.

2 BY MR. FREEDMAN:

3 Q. Do you remember directing
4 anybody else to do so?

5 MS. MENY: Same objection.

6 THE WITNESS: Not that I

7 recall.

8 BY MR. FREEDMAN:

9 Q. Do you remember anybody telling
10 you that they had done that research?

11 MS. MENY: Objection. Vague.

12 THE WITNESS: Not that I

13 recall.

14 BY MR. FREEDMAN:

15 Q. Okay. Can you read for me the
16 next sentence.

17 A. "Although this group uses
18 Snapchat often, they also reported it as a
19 major source of angst unlike other apps."

20 Q. Sir, because you claim that
21 you've never seen this research before, the
22 conclusions in this report were never used by
23 you in informing product changes, true?

24 MS. MENY: Objection. Vague.

25 MS. DEGTYAREVA: Join.

1 (Exhibit No. 13 was marked for
2 identification.)

3 THE WITNESS: (Peruses
4 document.) Okay. Okay.

5 BY MR. FREEDMAN:

6 Q. Sir, this is another e-mail
7 that you are on, right, sir?

8 A. Yes.

9 Q. Within a couple of days of the
10 e-mail we were just looking at, true?

11 A. I don't remember when the other
12 one was. Yes, I guess this is a few days
13 before.

14 Q. And if you flip to the -- this
15 e-mail is entitled: "Re: Snapchat
16 distribution streak greater than three."
17 True?

18 A. Yes.

19 Q. If you flip to the page ending
20 345, the e-mail at the bottom, that's another
21 e-mail from [REDACTED] right?

22 A. Yes.

23 Q. And Ms. [REDACTED] says in the first
24 bullet point: "22 percent, 35.6 million of
25 DAU, have at least one Snapstreak increase."

1 Right, sir?

2 A. Yes.

3 Q. If you flip to the bullet
4 point, it's the fourth black bullet point.

5 A. Okay.

6 Q. It says: "Snapstreak users are
7 younger, 13 to 17, compared to other DAU."

8 I read that correctly, right,
9 sir?

10 A. Yes.

11 Q. Does that refresh your
12 recollection that Snapstreak users tend to be
13 younger?

14 A. I think you said the majority.
15 It says 47 percent, so -- and that was in
16 2017. So, you know, I think what I said, by
17 the time I left Snap -- well, even in 2017,
18 it was not a majority. Obviously, there are
19 a lot of users within this bucket who are 13
20 to 17.

21 Q. So, sir, we can agree that
22 Snapstreak youngsters tend to be -- Snap --
23 scratch that.

24 We can agree that Snapstreak
25 users tend to be Snap's youngest users, true?

1 MS. DEGTYAREVA: Objection.

2 Misstates the testimony and the
3 document, speculation, and foundation.

4 MS. MENY: Join. Also vague.

5 THE WITNESS: Yeah, what --
6 what do you mean by "tend to be"?

7 BY MR. FREEDMAN:

8 Q. Well, 47 percent of Snapstreak
9 users are in the 13 to 17 age bucket, right,
10 sir?

11 A. That's right. In 2017. In
12 January of 2017.

13 Q. Sure. How about in this
14 document as we read it, it says: "47 percent
15 of Snapstreak users are in the 13 to 17 age
16 bucket." True?

17 A. That's right.

18 Q. Then right below that it says:
19 "The biggest age groups for streak users are
20 16, 15 percent; 17, which is 12 percent; and
21 15, which is 10 percent. Right, sir?

22 A. Yes.

23 Q. And if we flip to page ending
24 347, the top chart there has "Daily active
25 user age distribution," right, sir?

1 CERTIFICATE OF CERTIFIED SHORTHAND

2 REPORTER

3 The undersigned Certified
4 Shorthand Reporter does hereby certify:

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

17 In witness thereof, I have
18 subscribed my name
19 this date: April 8, 2025.

20
21 <%14542,Signature%>22 _____
23 LESLIE A. TODD, CSR, RPR24 Certificate No. 5129
25