

AMENDED Exhibit 853

**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

Nona Yadegar

1

1 UNITED STATES DISTRICT COURT

2 FOR THE NORTHERN DISTRICT OF CALIFORNIA

3 -----X
4 IN RE: SOCIAL MEDIA ADOLESCENT) MDL No. 4:22-md-
5 ADDITION/PERSONAL INJURY) 3047-YGR
6 PRODUCTS LIABILITY LITIGATION)
7 -----X

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF LOS ANGELES

10 SPRING STREET COURTHOUSE

11 COORDINATION PROCEEDING)
12 SPECIAL TITLE [RULE 3,400]) Lead Case No. for
13 SOCIAL MEDIA CASES) Filing Purposes
14) 22STCV21355
15)
16 This Document Relates to:)
17 STATE OF TENNESSEE, et al.,)
18 vs.)
19 META PLATFORMS, INC., and) CONTAINS HIGHLY
20 INSTAGRAM, LLC, Case No.) CONFIDENTIAL
21 23-1364-IV) INFORMATION
22 -----X

23 VIDEOTAPED DEPOSITION OF NONA YADEGAR

24 LOS ANGELES, CALIFORNIA

25 MONDAY, DECEMBER 16, 2024

9:35 A.M.

Job No.: 7040317

Pages: 1 - 418

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

1 agree that Snap believes children age 13 to 17
2 are a vulnerable population?

3 MS. TELLER: Objection.

4 Argumentative, vague.

5 THE WITNESS: What I would say
6 is that users 13 to 17 deserve a -- an
7 experience that is tailored to their
8 ages.

9 MR. BILSBORROW: Okay. We'll
10 mark as Exhibit 6 tab 7.

11 (Exhibit No. 6 was marked for
12 identification.)

13 BY MR. BILSBORROW:

14 Q. Ms. Yadegar, I've handed you what's
15 been marked as Exhibit 6. It's a lengthy
16 document. I can point you in the direction of
17 what I'm going to ask you about, but you're free
18 to look at anything you want.

19 A. I'll ask for breaks to read once we
20 get to relevant questions.

21 Q. Sure. And we can go off the record
22 and you can review as much as you'd like.

23 So this is a document called "Trust
24 and Safety, December 2019 Board Meeting."

25 Do you see that?

1 A. I see that, yes.

2 Q. And at this time, December 2019,
3 you were director of platform policy. True?

4 A. I might not have been promoted to
5 director yet, but I held that general role of
6 head of platform policy.

7 Q. And you testified that head of
8 platform policy functionally was the same as
9 director of platform policy. Right?

10 A. Yes.

11 Q. Either way, in December 2019, you
12 were in the platform policy role, correct?

13 A. Mm-hmm. Yes.

14 Q. In that role, did you participate
15 in board meetings?

16 A. Sometimes.

17 Q. And I'll represent to you that this
18 document was in your custodial file, which is how
19 we found it.

20 In your experience participating in
21 board meetings, who from Snap participates in
22 board meetings?

23 MS. TELLER: Objection.

24 Foundation, calls for speculation.

25 THE WITNESS: I don't know how

1 the board meetings are exactly run, but
2 it is my understanding that depending on
3 the topics on the agenda, the relevant
4 team members are brought in to speak to
5 whatever is on the agenda.

6 BY MR. BILSBORROW:

7 Q. So when you had relevant knowledge
8 about something on the agenda, you were brought
9 in to speak to that as head or director of
10 platform policy, correct?

11 A. Correct.

12 MS. TELLER: Objection.

13 Speculation.

14 BY MR. BILSBORROW:

15 Q. I think you testified that you did
16 participate at board meetings, correct?

17 A. Sometimes.

18 Q. If you turn over to the page ending
19 in 469. It's page 10 of the document.

20 And what I'm going to ask you about
21 is the top of the page, which is titled "Issues
22 Affecting Minors on Snap."

23 A. (Peruses document.) I read the
24 section just between 2.0 and 2.1.

25 Q. Okay. So if you take a look at the

1 first sentence there, it says: "The safety of
2 minors on Snap is our highest priority." Right?

3 A. Yes.

4 Q. And you agree with that?

5 A. Yes.

6 Q. "Ages 13 to 17 years are a large
7 Snap demographic, and given their age, are also a
8 vulnerable population."

9 Do you see that?

10 A. Yes.

11 Q. So when we talk about a vulnerable
12 population, that's -- that's phrasing that was
13 used in these board minutes. True?

14 MS. TELLER: Objection.

15 Foundation.

16 THE WITNESS: As I said before,
17 when you were using that word, I said I
18 didn't know if it was a word we were
19 using in our documentation, but I see
20 that it is a word we have used in our
21 documentation.

22 BY MR. BILSBORROW:

23 Q. Not only are children age 13 to 17
24 a vulnerable population, but Snap believes those
25 users require a heightened standard of care.

1 True?

2 A. Yes.

3 MS. TELLER: Objection.

4 Foundation, calls for a legal
5 conclusion.

6 THE WITNESS: Oh, yeah, I --
7 like to the extent that I was using the
8 words "unique population,"
9 "age-appropriate design codes," I think
10 this speaks to this concept that ages 13
11 to 15, 15 to 17, under 13, all require
12 age-appropriate experiences on the app.

13 BY MR. BILSBORROW:

14 Q. Well, in fact, Snap believes that
15 ages 13 to 17 require a heightened standard of
16 care, correct?

17 MS. TELLER: Objection.

18 Foundation, calls for a legal
19 conclusion, asked and answered.

20 THE WITNESS: To the extent that
21 "heightened standard of care" is a legal
22 term of art, I cannot speak to that, but
23 certainly, as I spoke to, just this
24 unique age demographic that requires
25 specific protections, yes.

1 BY MR. BILSBORROW:

2 Q. How about this: If Snap knows that
3 part of its platform is posing a risk to minor
4 safety -- minor user safety, Snap should warn
5 minor users of that risk. Do you agree?

6 MS. TELLER: Objection. Vague,
7 incomplete hypothetical, asked and
8 answered.

9 THE WITNESS: I think we have a
10 responsibility to educate our community
11 about the risks that can -- they can
12 experience using Snapchat. One of the
13 ways to do that could be to warn them,
14 yes.

15 BY MR. BILSBORROW:

16 Q. And that would be Ethics by Design,
17 right?

18 MS. TELLER: Objection. Vague.

19 THE WITNESS: I have no idea
20 what Ethics by Design is.

21 BY MR. BILSBORROW:

22 Q. Well, take a look at point number 2
23 on slide 464. It says: "We want to empower our
24 community with the tools and knowledge to control
25 their experiences when using our products,

1 including related to their privacy, safety, and
2 well-being."

3 Do you see that?

4 A. I see that.

5 Q. You would agree that empowering the
6 community means warning users if Snap knows about
7 a risk to minors' safety that exists on Snapchat.

8 MS. TELLER: Objection.

9 Foundation, speculation.

10 I think we should wrap up the
11 questions on this soon, since the
12 witness said she doesn't know what that
13 document is.

14 BY MR. BILSBORROW:

15 Q. You can answer, Ms. Yadegar.

16 A. Can you ask that question again?

17 Q. Sure. You would agree with me that
18 empowering the community, as is referenced in
19 this slide on Ethics by Design, empowering the
20 community means warning users if Snap knows about
21 risks to minor safety that exists on Snapchat.
22 Agree?

23 MS. TELLER: Same objections.

24 THE WITNESS: I agree that
25 empowering the community is giving them

1 tools and knowledge and education. I
2 can't speak broadly to what you're
3 specifically asking with respect to a
4 warning, but certainly in some cases a
5 warning would be a good tool or
6 knowledge.

7 BY MR. BILSBORROW:

8 Q. Sure. If Snap knows about a risk,
9 they should warn users of that risk. Fair?

10 MS. TELLER: Objection. Vague,
11 incomplete hypothetical, asked and
12 answered.

13 THE WITNESS: It feels like
14 you're trying to ask me to repeat
15 myself, if that's what you'd like. I
16 don't want to say yes or no to how
17 you're mischaracterizing my words.

18 BY MR. BILSBORROW:

19 Q. I was asking -- I was asking you a
20 different question. I'm just asking, if Snap
21 knows about a risk, it should tell users about
22 the risk. Fair?

23 MS. TELLER: Objection.
24 Incomplete hypothetical, asked and
25 answered, vague.

1 THE WITNESS: If Snap is aware
2 of a safety issue, I believe it is our
3 obligation to make sure we educate our
4 community in a number of ways or give
5 them tools in order to have knowledge or
6 control over that experience.

7 BY MR. BILSBORROW:

8 Q. And educating the community could
9 consist of a warning. Fair?

10 A. Educating our community can
11 absolutely consist of a warning.

12 MR. BILSBORROW: Okay. We can
13 take a break.

14 THE WITNESS: Thank you so much.

15 THE VIDEOGRAPHER: We're now
16 going off the record, and the time is
17 12:02 p.m.

18 (Lunch recess.)

19 THE VIDEOGRAPHER: We are now
20 going back on the record, and the time
21 is 12:35 p.m.

22 BY MR. BILSBORROW:

23 Q. Ms. Yadegar, before the break, we
24 were talking about warnings. Do you recall that?

25 A. Yes.

1 A. I don't know what it -- there's
2 never -- there's not a class of accounts that we
3 would not let people follow that we would have to
4 delete those accounts.

5 I think what I'm saying here is I'm
6 asking this person what their focus is -- focus
7 is because it's problematic the extent of porn
8 accounts and the traffic they represent, and they
9 are undisturbed unless reported to us.

10 Q. Okay. This is in 2017. How --

11 A. Yes.

12 Q. How long did Snap leave porn
13 accounts almost undisturbed unless reported to
14 them?

15 MS. TELLER: Objection.

16 Mischaracterizes prior testimony and the
17 document.

18 THE WITNESS: Proactive scanning
19 of -- we would have to look into the
20 timeline of when we built nudity
21 classifiers and deployed them on the
22 platform.

23 BY MR. BILSBORROW:

24 Q. Did that happen when you were head
25 of trust and safety?

1 A. Maybe towards the end. I can't
2 recall. This was just like a period of time
3 where basically classifiers could only work on
4 texts, I believe, back in those days, and then
5 folks started building, not only in our company
6 but in the industry, sophisticated image
7 detection tools to start being able to catch
8 things like this with high precision.

9 Q. So we discussed that you left trust
10 and safety in July of 2018. Right?

11 A. Yeah, but in reality, in December
12 of 2018.

13 Q. Okay. And you think maybe toward
14 the end of your tenure at trust and safety, Snap
15 developed nudity classifiers.

16 A. Maybe. I -- I shouldn't have even
17 guessed that. I'm not sure -- I know that we
18 have -- now have nudity classifiers. I can't
19 tell you exactly when they were built and when
20 they came online.

21 Q. So until nudity classifiers came
22 online, Snap knowingly left porn almost
23 undisturbed unless it was reported.

24 MS. TELLER: Objection.

25 Mischaracterizes prior testimony.

1 THE WITNESS: Until we had
2 nudity classifiers, there was no way to
3 like catch porn unless somebody reported
4 it to us on the platform.

5 BY MR. BILSBORROW:

6 Q. Okay. So pornographic accounts
7 would continue to persist on the -- on Snapchat
8 unless they were reported. True?

9 A. Yes, true. Or unless we found them
10 in some other way.

11 Q. Are pornographic accounts still a
12 problem on Snapchat in 2024?

13 MS. TELLER: Objection.
14 Foundation.

15 THE WITNESS: I'm not sure,
16 again the scope and scale, but I know
17 that our nudity detection models have
18 vastly improved and are able to detect
19 problematic content like this much more
20 quickly, if not instantly.

21 MR. BILSBORROW: Let's look at
22 tab 21. And this will be Exhibit 20.
23 (Exhibit No. 20 was marked for
24 identification.)

25 THE WITNESS: Thank you.

1 BY MR. BILSBORROW:

2 Q. Ms. Yadegar, I've handed you what's
3 been marked as Exhibit 21. This is an e-mail
4 chain. On the first page, you can see that
5 there's a forwarded message from Techno Sapiens.

6 Do you see that?

7 A. I do see that.

8 Q. And that looks like it's a Substack
9 page.

10 MS. TELLER: Objection.

11 Foundation.

12 THE WITNESS: Yeah.

13 BY MR. BILSBORROW:

14 Q. Well, the e-mail is @Substack,
15 right?

16 A. Yeah, yeah.

17 Q. And the subject of the Techno
18 Sapiens e-mail is "New Study on Girls Social
19 Media Use."

20 Do you see that?

21 A. Yes.

22 Q. And that's dated April 3rd of 2023.
23 Correct?

24 A. Yes.

25 Q. Okay. And this article from Techno

1 Sapiens, or this study, is ultimately sent to
2 you, right?

3 A. Yes.

4 Q. From Rachel Racusen?

5 A. Yes.

6 Q. And you see your name in the "to"
7 line of Ms. Racusen's e-mail, correct?

8 A. Yes.

9 Q. And Ms. Racusen provides a summary
10 of -- of the study, correct?

11 A. Yes.

12 Q. She says in the second bullet
13 point: "The majority of girls who use Instagram,
14 58 percent, and Snapchat, 57 percent, say they've
15 been contacted by a stranger on these platforms
16 in ways that make them uncomfortable."

17 Do you see that?

18 A. Yes.

19 Q. And then if you drop down a couple
20 of bullets, it says: "Of Snapchat, a 13-year-old
21 suggested the platform make it so," quote,
22 "adults can't add us kids," end quote.

23 Do you see that?

24 A. Yes.

25 Q. Did you review this study when it

1 was sent to you?

2 A. I probably either reviewed the
3 summary or read the study more carefully.

4 Q. And did you investigate how it was
5 that 57 percent of girls on Snapchat are in a
6 position where they say they've been contacted by
7 a stranger?

8 MS. TELLER: Objection.

9 Argumentative.

10 THE WITNESS: I think in any
11 instance of hearing of this type of
12 thing, and as you have asked me, I'm
13 aware that people have been contacted by
14 strangers, we're constantly working on
15 different solutions to address this
16 problem.

17 So in this -- I might not have
18 followed up in this exact moment as it
19 relates to this 57 percent, but it's an
20 issue that I'm familiar with, and that
21 would have come up again and again in
22 our safety conversations to try to
23 mitigate this issue.

24 BY MR. BILSBORROW:

25 Q. So to your knowledge, what

1 MS. TELLER: Objection. Vague
2 as to time, foundation.

3 THE WITNESS: In the tool. Not
4 on the platform.

5 BY MR. BILSBORROW:

6 Q. In the tool --

7 A. There is a policy that governs the
8 retention of reported content. It's documented
9 clearly somewhere, just not in my head right now.

10 Q. And that's a policy that you either
11 wrote initially or advised.

12 A. That's a policy I would have
13 advised on with our safety legal team.

14 Q. Ms. Yadegar, I just want to ask you
15 a couple of questions about the use of Snapchat
16 at schools. Okay?

17 A. Okay.

18 Q. You're aware that teenagers use
19 Snapchat when they're at school, right?

20 A. Yes.

21 Q. Teenagers spend seven, eight hours
22 a day during the school year at school. Correct?

23 A. Yes.

24 Q. And they will snap pictures of
25 events taking place at school, correct?

1 A. Yes.

2 MS. TELLER: Objection.

3 Foundation.

4 BY MR. BILSBORROW:

5 Q. And Snap actually has created --
6 sorry, strike that.

7 Snap encourages teenagers to use
8 Snapchat in the school setting, correct?

9 A. No.

10 Q. It's your testimony that Snap
11 doesn't encourage students to use Snapchat in the
12 school setting?

13 A. I don't know what your definition
14 of "school setting" is, but, no, I don't believe
15 we do.

16 Q. Well, at school or school related
17 functions.

18 A. I don't believe we encourage usage
19 in terms of a specific type of school or event.

20 Q. Are there tags on Snapchat that
21 allow teenagers to tag themselves at school?

22 MS. TELLER: Objection.

23 Foundation.

24 THE WITNESS: You mean location,
25 the location of a school?

1 Q. And if you just flip through the
2 first slide, on the page ending 583, there's some
3 fun facts about school, right?

4 MS. TELLER: Objection.

5 Foundation.

6 THE WITNESS: Wow. Sorry. I
7 was surprised by how many more days
8 students go to school in China. I just
9 wanted to qualify my "wow."

10 Those are all really interesting
11 facts.

12 BY MR. BILSBORROW:

13 Q. And one of those, Ms. Yadegar, is
14 in the U.S., the average school day is
15 approximately seven hours, right?

16 A. Yes.

17 MS. TELLER: Objection.

18 Foundation.

19 BY MR. BILSBORROW:

20 Q. To your knowledge, does Snap
21 restrict the ability of teenagers to use Snapchat
22 during the seven hours they're likely to be at
23 school?

24 A. No.

25 Q. Has it ever looked in -- has Snap

1 ever looked into that?

2 A. No.

3 Q. And school administrators have
4 complained or reached out to Snapchat -- or to
5 Snap from time to time asking for help in
6 controlling their students' Snapchat use. True?

7 MS. TELLER: Objection.

8 Foundation.

9 THE WITNESS: There may be
10 instances of administrators reaching
11 out.

12 BY MR. BILSBORROW:

13 Q. If you look at the next slide
14 ending 584, it's titled "Points to Remember:
15 Spotlight/UGC."

16 Do you see that?

17 A. I do.

18 Q. And UGC is user-generated content,
19 right?

20 A. Yes.

21 Q. There's a few bullet points there.
22 Do you see?

23 A. Yes.

24 Q. The first bullet point says: "Be
25 aware that there's a high possibility to see

1 (Exhibit No. 30 was marked for
2 identification.)

3 BY MR. BILSBORROW:

4 Q. Ready. Ms. Yadegar, I've shown you
5 what's been marked as Exhibit 30. This is an
6 e-mail chain from 2017, and this is when you were
7 head of trust and safety, right?

8 A. Yes.

9 Q. We talked previously about school
10 administrators reaching out to Snap asking for
11 help. Right?

12 MS. TELLER: Objection. Vague.

13 THE WITNESS: Yes. In this case
14 the administrator is asking for IT help
15 specifically, but they do want to get
16 help with respect to Snapchat.

17 BY MR. BILSBORROW:

18 Q. Well, if you turn over to the third
19 page of the document, it's the Bates ending 7542.
20 This individual writes: "I'm a teacher within
21 the Huron Superior Catholic School" -- School
22 District -- sorry, let me start over.

23 "I'm a teacher within the Huron
24 Superior Catholic District School Board, and I
25 would like to have the Snapchat app blocked from

1 our router, as unrestricted use of this app has
2 raised some concerns with harassment, et cetera,
3 in our schools. It's easy to block websites but
4 not so much mobile applications. Can you provide
5 me with the information I need to ensure that
6 Snapchat is blocked from our school's router?"

7 Did I read that correctly?

8 A. I see that.

9 Q. And so this individual is asking
10 for Snapchat to be blocked, right?

11 A. Yes.

12 Q. And the reason for that is, as they
13 state, is there's some concerns with harassment,
14 correct?

15 A. Yes.

16 MS. TELLER: Objection.

17 Speculation, foundation.

18 BY MR. BILSBORROW:

19 Q. That's what stated in the e-mail,
20 right?

21 A. Yes.

22 Q. If you flip over to the first page
23 in the document, someone named [REDACTED] --

24 A. Mm-hmm.

25 Q. -- is that how you say it?

1 A. I think so.

2 Q. She writes and copies in a
3 follow-up that was received from the teacher,
4 right?

5 A. Yes.

6 Q. She says: "Students in the school
7 are sending inappropriate messages to other
8 students in the school using Snapchat over our
9 school wireless network." Correct?

10 A. Correct.

11 Q. And the response, which is directly
12 above is: "Unfortunately, I'm able -- unable to
13 provide assistance related to technologies
14 outside of Snapchat." Correct?

15 A. Correct.

16 Q. And to your knowledge, has Snap
17 ever blocked the use of Snap or Snapchat in a
18 school setting?

19 MS. TELLER: Objection.

20 Foundation.

21 THE WITNESS: I don't even know
22 how we would do that.

23 BY MR. BILSBORROW:

24 Q. Has Snap ever used geofencing
25 technology to inhibit the use of Snapchat in

1 school settings?

2 A. Not that I know of.

3 MS. TELLER: Objection.

4 Foundation.

5 BY MR. BILSBORROW:

6 Q. Does Snap restrict push
7 notifications to teenagers during the time when
8 those users are likely to be in school?

9 A. Not that I know of.

10 MS. TELLER: Objection.

11 Foundation.

12 BY MR. BILSBORROW:

13 Q. Has Snap ever considered enacting a
14 policy to restrict push notifications to students
15 during the time they are likely to be in school?

16 MS. TELLER: Objection.

17 Foundation.

18 THE WITNESS: Not that I know

19 of.

20 BY MR. BILSBORROW:

21 Q. And you were director of platform
22 policy for four years, right?

23 A. Yes. Those aren't necessarily
24 solutions I think would make the most sense.

25 MR. BILSBORROW: Okay. Let's

1 defendants online have questions?

2 (No response.)

3 MS. TELLER: I guess that's no.

4 MR. BILSBORROW: Okay.

5 BY MR. BILSBORROW:

6 Q. Ms. Yadegar, during the questioning
7 with your attorney, you talked about the fact
8 that you feel a deep responsibility to
9 Snapchatters and to protect and to keep -- help
10 keep Snapchatters safe. Is that fair?

11 A. I do.

12 Q. And that was part of the reason you
13 wanted to participate in the creation of Family
14 Center. Right?

15 A. I think it was my job to
16 participate in Family Center. But part of the
17 reason that I have been at Snap for so long and
18 that I have stayed in these roles is because I
19 believe in that deep commitment to the safety of
20 our users.

21 Q. You've been at Snap since 2016?

22 A. Yes.

23 Q. Snap didn't have Family Center in
24 2016?

25 A. No.

1 Q. Snap didn't have family center in
2 2017?

3 A. No.

4 Q. Snap didn't have Family Center in
5 2018?

6 A. No.

7 Q. Snap didn't have Family Center in
8 2019?

9 A. No.

10 Q. Snap didn't have Family Center in
11 2020?

12 A. No.

13 Q. Snap didn't have Family Center in
14 2021?

15 A. I -- did we -- I just wanted to
16 like confirm the launch date, but I assume you're
17 speaking accurately.

18 Q. Family Center launched in 2022.

19 A. Okay.

20 Q. True?

21 And when Snap finally introduced
22 Family Center in 2022, it was the only major
23 social media platform that didn't have any
24 parental controls. True?

25 MS. TELLER: Objection.

1 Foundation.

2 THE WITNESS: I take your word
3 for it.

4 BY MR. BILSBORROW:

5 Q. Do you know that, or no?

6 A. I don't know that.

7 Q. Okay. Let's show you a document.
8 (Exhibit No. 34 was marked for
9 identification.)

10 THE WITNESS: (Peruses
11 document.) Okay, I see this.

12 BY MR. BILSBORROW:

13 Q. So, Ms. Yadegar, I've shown you
14 what's been marked as Exhibit 34. This is an
15 e-mail chain that you're a part of. True?

16 A. Yes.

17 Q. And this e-mail chain is forwarding
18 an article from the Wall Street Journal from
19 April 16th, 2022, correct?

20 A. Correct.

21 Q. And the title of that article is
22 "How to Use Parental Controls on YouTube, TikTok,
23 Instagram, and Snapchat." True?

24 A. Yes.

25 Q. And Rachel Racusen sends that

1 article to the [REDACTED] e-mail,
2 right?

3 A. Yes.

4 Q. And you were part of that Listserv,
5 right?

6 A. Yes.

7 Q. And Ms. Racusen summarizes or
8 highlights portions of the article, correct?

9 A. Yes.

10 Q. If you take a look at the second
11 bullet point, she says: "For Snapchat, as we had
12 expected, she mentions we are the only major
13 platform that does not yet have parental
14 controls. Outlines are default safety and
15 private setting -- privacy settings, especially
16 with respect to younger users, our map settings,
17 and notes that our first parental tools will be
18 coming this summer."

19 Do you -- did I read that
20 correctly?

21 A. Yes.

22 Q. Do you disagree with that, that in
23 2022 Snap did not have parental controls?

24 A. I do not disagree with that.

25 Q. And even after Snap launched Family

1 Center in 2022, you wouldn't consider that
2 parental controls, right?

3 MS. TELLER: Objection. Vague.

4 THE WITNESS: There are some
5 parental controls, but a lot of it was
6 focused on insights.

7 BY MR. BILSBORROW:

8 Q. Well, there are parental controls
9 now, right, but when Family Center launched,
10 there was no parental controls, were there?

11 MS. TELLER: Objection. Vague.

12 THE WITNESS: I can't recall
13 about the content settings, but -- I
14 would have to look at something
15 specifically, but there may have been
16 content controls.

17 BY MR. BILSBORROW:

18 Q. You think there were content
19 controls when Family Center launched?

20 A. I would -- I can't recall.

21 Q. Okay.

22 MR. BILSBORROW: I have no
23 further questions.

24 THE VIDEOGRAPHER: Okay.

25 MS. TELLER: Off the record.

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

14 In witness thereof, I have subscribed my name
15 this date: January 6, 2025.

16
17 <%14542,Signature%>
18 LESLIE A. TODD, CSR, RPR

19 Certificate No. 5129
20

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