

AMENDED Exhibit 948

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

Juliet Shen

1

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA

3 - - -

4 IN RE: SOCIAL MEDIA ADOLESCENT MDL NO.
5 ADDICTION/PERSONAL INJURY PRODUCTS 3047
6 LIABILITY LITIGATION CASE NO.

7 THIS DOCUMENT RELATES TO: 4:22-MD-03047-YGR

8 ALL ACTIONS

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF LOS ANGELES
11 UNLIMITED JURISDICTION

12 COORDINATION PROCEEDING
13 SPECIAL TITLE (RULE 3.550)

JCCP

14 SOCIAL MEDIA CASES

JUDICIAL COUNCIL
PROCEEDING NO. 5255

15 THIS DOCUMENT RELATES TO:

JUDGE CAROLYN B. KUHL
DEPT. 12

16 ALL ACTIONS

17 - - -

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

18 ** VIDEOTAPED DEPOSITION**

19 JULIET SHEN

20 Tuesday, March 4, 2025

21
22
23 Reported by:

24 Angela M. Shaw-Crockett, CCR, CRR, RMR, CSR

25

1 explorations related to this topic. If so, I could
2 link them in the Relevant Snap Research section."

3 Do you see that?

4 A. Yes.

5 Q. You respond at 9:36, saying:

6 "Hmm, this is still my 'volunteer' work
7 area, ha ha. But I haven't done anything recently."

8 I read that correctly, right?

9 A. Yes.

10 Q. Ma'am, what you're telling Ms. [REDACTED] is that
11 you haven't delivered any mental health and
12 well-being features recently, right?

13 MR. UMHOFFER: Objection, misstates the
14 document.

15 A. This was an area of work that I was doing
16 on top of my actual responsibilities around online
17 safety. I was not expected to deliver anything, and
18 I hadn't at this time.

19 BY MR. FREEDMAN:

20 Q. That's a "yes" to my question? You're
21 saying you haven't delivered any mental health or
22 well-being features recently?

23 MR. UMHOFFER: Same objection.

24 A. I don't know what you consider "recently."
25 The year before, I had launched Here For You.

1 BY MR. FREEDMAN:

2 Q. Well, what would you consider recently
3 when you wrote "recently"?

4 A. I don't remember what I meant at the time.

5 Q. I think you said you hadn't done anything
6 recently, right?

7 MR. UMHOFFER: Objection, misstates the
8 document.

9 A. Yes.

10 BY MR. FREEDMAN:

11 Q. And the reason why this was a volunteer
12 work area is because Snap didn't have a dedicated
13 product manager focused on mental health and
14 well-being features?

15 MS. DEGTYAREVA: Objection, speculation,
16 foundation.

17 MR. UMHOFFER: Join.

18 A. That's my understanding.

19 BY MR. FREEDMAN:

20 Q. You continue on:

21 "There is some work planned for a Here For
22 You hub. No spec yet, but literally discussed it
23 today. Unfortunately, nothing linkable."

24 I read that correct, right?

25 A. Yes.

1 MS. DEGTYAREVA: Okay.

2 MR. FREEDMAN: Let's see if we can clear
3 up the blurriness here a bit.

4 THE VIDEOGRAPHER: Auto focus button.

5 BY MR. FREEDMAN:

6 Q. Ms. Shen, I'm going to represent to you
7 that this is a -- what we call a "Plaintiff fact
8 sheet." This is a document that Snapchat has asked
9 our minor plaintiffs to fill out and to identify the
10 features on Snapchat that they've used and whether
11 it contributed to their injuries.

12 Now, today I'm going to cross these out,
13 and I want to ask about your awareness of whether --
14 and excuse my terrible handwriting, Ms. Shen --
15 whether these features can be addictive or whether
16 they can cause mental health harms such as suicidal
17 thoughts, body dysmorphia, anxiety, or depression.
18 Okay?

19 So let's go one by one?

20 MS. DEGTYAREVA: I'm going to make a
21 standing objection to the use of this document
22 based on speculation, foundation, vague and
23 ambiguous.

24 MR. UMHOFFER: I'll join that. And so on
25 questions, we'll just have a standing objection

1 to the use of this document in asking these
2 questions.

3 You can certainly ask the questions,
4 but --

5 MR. FREEDMAN: Right.

6 BY MR. FREEDMAN:

7 Q. So Ms. Shen, we're going to go through
8 these features and we are going to tell the jury
9 whether or not you conducted any research into
10 whether or not these individual features cause
11 addiction or mental health harms.

12 Ms. Shen, as the lead safety product
13 manager who is the internal expert on safety in and
14 beyond the product team, did you ever come up with
15 any research as to whether or not sending or
16 receiving chats or Snaps can be addictive or cause
17 mental health harms?

18 MR. UMHOFFER: Objection to the preamble.

19 Assumes facts.

20 MS. DEGTYAREVA: Join.

21 A. To clarify your question, am I answering
22 for both columns, or do you prefer to ask one by one
23 or --

24 BY MR. FREEDMAN:

25 Q. We're going to ask for each row here. So

1 we're going to do one of these features listed at a
2 time, and you're going to tell me whether or not you
3 conducted any research into whether or not the
4 feature could be addictive or whether it can
5 contribute to mental health harms, okay?

6 So as lead safety product manager, the
7 expert in safety both in and beyond the product,
8 sending or receiving chats or Snaps could be
9 addictive.

10 Have you conducted any research into that?

11 MR. UMHOFFER: Same objection.

12 MS. DEGTYAREVA: Join.

13 A. I personally haven't.

14 BY MR. FREEDMAN:

15 Q. How about whether they contribute to
16 mental health harms?

17 MR. UMHOFFER: Just for the record, I'm
18 going to reflect that she gave an answer. What
19 was written down was not her answer, but the
20 word "no" was written down, which did not
21 appear in her answer.

22 I just want to make the record clear about
23 what's being said as opposed to what's being
24 written down.

25

1 BY MR. FREEDMAN:

2 Q. Ma'am, do you understand that the answers
3 I'm asking you to provide are whether or not you
4 conducted research about whether each one of these
5 features were addictive or caused mental health
6 harms?

7 A. I again want to clarify that I never
8 personally did research, and I want to know if what
9 you're -- if the spirit of your question means if
10 I'm aware of other teams doing research, or if I'm
11 aware that such research was done at Snap.

12 I'm not sure if I understand your
13 question.

14 Q. My question is whether you or the people
15 working for you, as safety product managers in
16 charge of all safety products relating to child
17 safety and safety product, conducted research into
18 whether these features could be addictive or cause
19 mental health harms.

20 Do you understand that?

21 A. I do, but I didn't have anyone reporting
22 to me. So it would just be me.

23 So just to clarify again, the question is
24 whether I personally did any research on these
25 areas?

1 BY MR. FREEDMAN:

2 Q. Yes.

3 A. Okay. Thank you.

4 Q. So the answer is "no" for sending and
5 receiving features, correct, or chats and Snaps?

6 A. Correct that it's "no."

7 Oh, for mental harms specifically on
8 sending and receiving chats or Snaps related to
9 grooming, I did some research on my own.

10 Q. Okay. Say, yes on grooming.

11 But nothing related to depression,
12 anxiety, stress, or suicidal thoughts?

13 A. I did a little bit of research in terms of
14 how sending chats to your friends can help people
15 when they're in a mental health crisis.

16 Q. But how about whether or not they can
17 cause mental health harms?

18 MR. UMHOFFER: Objection, vague as to the
19 word "they."

20 A. I don't remember the specific questions we
21 used, but I believe the overall topic was around
22 mental well-being, and this is the information that
23 was provided to us by teenagers.

24 BY MR. FREEDMAN:

25 Q. Okay. So we'll change this one to yes?

1 Does that sound right?

2 A. Yes.

3 Q. How about did you --

4 MS. DEGTYAREVA: Just for the record, the
5 document is listed as "yes, grooming," where
6 her answer was beyond that.

7 MR. FREEDMAN: Okay. "Yes, and grooming."
8 How about that?

9 MS. DEGTYAREVA: Sure. It still doesn't
10 represent her answer exactly, so I'll note for
11 the record that's not what her answer was.

12 BY MR. FREEDMAN:

13 Q. Ms. Shen, you were never a part of any
14 research related to whether or not using lenses or
15 filters could be addictive, right?

16 A. No.

17 Q. Never a part of any research related to
18 whether mental health harms could be caused by
19 lenses or filters?

20 A. I believe I was shared on some research
21 related to lenses and the potential mental harm they
22 could do.

23 Q. You didn't contribute on it. You just
24 said you worked with it shared with you?

25 A. To the best of my recollection.

1 Q. You don't remember ever conducting or
2 participating in any research related to mental
3 health harms with lenses and filters?

4 A. I wasn't on the lens or filter team.

5 Q. So that's a "no"?

6 A. Right.

7 Q. How about whether communicating with other
8 users via voice or video call could be addictive?
9 Did you ever participate in any research related to
10 that?

11 A. No.

12 Q. How about whether communicating with other
13 users via voice or video call could cause mental
14 health harms?

15 A. No.

16 Q. As the only product safety manager in
17 child safety areas, how about whether posting
18 stories could be addictive?

19 Did you ever contribute to any research on
20 that?

21 A. No.

22 Q. How about mental health harms?

23 A. No.

24 Q. Ma'am, as you look through the rest of the
25 features on this page, is it a "no" for each one?

1 MS. DEGTYAREVA: Objection, compound
2 question.

3 MR. UMHOFFER: Join.

4 A. Sorry. Can you move the paper up a
5 little?

6 BY MR. FREEDMAN:

7 Q. Sorry about that.

8 A. I believe I contributed to some research
9 around posting and viewing content on Spotlight and
10 its impact on well-being. And the content on
11 Spotlight just wasn't very good, and so I think the
12 research showed that it was not addictive.

13 Q. So "no" for all of these except for "yes"
14 for posting content on Spotlight?

15 A. I believe posting and viewing content on
16 Spotlight.

17 Q. And what was your research into mental
18 health harms for those?

19 A. I don't know if we did that.

20 Q. So then you did not contribute to any
21 research into viewing and posting content on
22 Spotlight?

23 MS. DEGTYAREVA: Objection, misstates the
24 testimony.

25 A. To clarify my response, I believe I said

1 we did some research on whether it was addictive.

2 BY MR. FREEDMAN:

3 Q. Oh, just addictive, but not whether or not
4 posting or viewing could cause mental health harms?

5 A. Right.

6 Q. I'll write no, no, no, no, yes, yes, no,
7 no. Does that look right?

8 A. I'm not sure that this captures what I
9 said, but I believe that this intends to represent
10 what you want it to represent.

11 Q. Ma'am, is anything here incorrect? Did
12 you contribute to researching any of these features
13 and whether they could be addictive or cause mental
14 health harms where I marked "no"?

15 A. No.

16 MR. UMHOFFER: Again, just a standing
17 objection to the way in which this document is
18 being used, but I think we've already
19 established that.

20 BY MR. FREEDMAN:

21 Q. Let's turn to these -- same thing here.

22 Ma'am, did you contribute to any research
23 into whether or not viewing content on Discover
24 could be addictive?

25 A. No.

1 Q. What about whether it can cause mental
2 health harms?

3 A. I believe I contributed to some research.

4 Q. What was that research?

5 A. To the best of my recollection, I believe
6 some of that research was around the types of
7 content that could be shown to people and the kind
8 of mental stress it could cause.

9 Q. And what was the -- where will we find
10 that research?

11 A. I don't remember.

12 Q. Who ran that study?

13 A. I'm not -- can we clarify what you mean by
14 "research"?

15 Q. Sure.

16 Did you -- were there any scientific
17 studies into the way in which the viewing content on
18 Discover could impact mental health of children?

19 MS. DEGTYAREVA: Objection, vague and
20 ambiguous.

21 MR. UMHOFFER: Join.

22 A. Can you specify what you mean by
23 "scientific study"?

24 BY MR. FREEDMAN:

25 Q. Ma'am, as the lead -- former lead safety

1 product manager, what do you believe a scientific
2 study is?

3 A. There are many types of scientific
4 studies, going from hard sciences to social
5 sciences. And the way that those experiments and
6 studies can be conducted can differ based on the
7 field. I'm not sure which kind of study you're
8 referring to here.

9 Q. How about were there any medical -- did
10 you consult with any medical professionals or
11 anybody with a science degree who was there to
12 determine whether or not viewing content on Discover
13 could cause mental health harms?

14 A. No. And if we are using that definition,
15 then I would like to go back to the prior page, and
16 we did not do that kind of study for the other types
17 of areas as well.

18 Q. Let's go back to this page for a second.

19 So you're saying that no scientists or
20 medical professionals would have been involved in
21 either of these two studies that we had previously
22 talked about?

23 MR. UMHOFFER: I'm going to object as
24 compound and asked and answered, but now we're
25 going back with a new definition. I just think

1 this document has become relatively useless
2 given the changing and moving definitions of
3 what research is.

4 MS. DEGTYAREVA: I would join in that
5 objection.

6 BY MR. FREEDMAN:

7 Q. Ma'am, when you said "yes" to those two
8 features, what was your definition of "study"?

9 MS. DEGTYAREVA: Objection. The question
10 that was asked was about research and not
11 study.

12 BY MR. FREEDMAN:

13 Q. Ma'am, I can rephrase.

14 What was your definition of "research"
15 when you said "yes" to those two things?

16 MR. UMHOFFER: Objection. There's three
17 things she said "yes" to.

18 A. In my previous responses when I was
19 talking about research, I was talking about both UX
20 research, which is a pretty standardized structural
21 way of understanding user behavior, as well as
22 research in terms of a deep dive in terms of
23 behavior.

24 This can sometimes mean working with data
25 science to better understand patterns of behavior,

1 but not always.

2 BY MR. FREEDMAN:

3 Q. Was the purpose of any of those studies
4 specifically to determine whether or not these
5 features could cause addiction in children?

6 A. I don't believe so.

7 Q. Now, when you said "yes" to viewing
8 content on Spotlight and posting content on
9 Spotlight, who led those research efforts?

10 A. I don't remember.

11 Q. Can you tell us anything about the
12 research you said "yes" to originally?

13 A. We wanted to understand the user behavior
14 of Spotlight and why it wasn't more used, and so we
15 worked with data scientists and other types of
16 researchers at Snap on that.

17 Q. So the goal of that research was to
18 understand why it wasn't being used more, right?

19 A. Yes.

20 Q. Not whether or not it was causing
21 addiction?

22 A. I believe it was abundantly clear that it
23 was not causing addiction.

24 Q. Based on what, ma'am?

25 A. From what I recall, the usage numbers.

1 Q. And what were those usage numbers?

2 A. I don't know.

3 Q. Who was involved in this research?

4 A. Maybe Josh Siegel.

5 Q. What is Josh Siegel's title?

6 A. His title changed many times while I was
7 at Snap, but for the purposes of this question, he
8 was the head of Spotlight product.

9 Q. And you're saying that you were involved
10 in some sort of effort with Josh Siegel to determine
11 whether or not Snapchat was addictive or Spotlight
12 was addictive?

13 A. That was not the focus of our research,
14 but there was relevant information in terms of
15 Spotlight not being addictive.

16 Q. Did you ever recommend that you take that
17 data that you and Mr. Siegel had gathered and give
18 it to any expert in mental health or addiction?

19 A. No.

20 Q. Did you consult with any experts outside
21 of Snapchat in the fields of addiction or mental
22 health in designing that study?

23 A. No.

24 Q. As you've testified to a couple of times
25 here today, you're not a certified addiction

1 specialist, right?

2 A. Yes.

3 Q. You have never held any degrees -- or
4 positions, rather, related to diagnosing addiction
5 in others?

6 A. No.

7 Q. And you never set out to determine whether
8 or not viewing or posting content on Spotlight could
9 be addictive, correct?

10 MS. DEGTYAREVA: Objection, misstates the
11 testimony.

12 MR. UMHOFFER: Join.

13 A. I'm not sure I understand the question.

14 BY MR. FREEDMAN:

15 Q. Ma'am, did you ever create an OKR to
16 understand whether Spotlight could cause addiction?

17 A. No.

18 Q. Let's move back here.

19 Ma'am, rather than go feature by feature,
20 I'm going to ask you to look at the screen.

21 Can you tell me whether or not you have
22 conducted or participated in any research related to
23 determining whether each one of these features could
24 cause addiction or mental health harms?

25 MS. DEGTYAREVA: Objection, vague and

1 ambiguous.

2 MR. UMHOFFER: Join.

3 A. No.

4 BY MR. FREEDMAN:

5 Q. When you say "no," what do you mean?

6 A. I mean that -- I mean that I didn't
7 contribute to research on addiction or mental health
8 harms for the features that I see on this paper in
9 front of me.

10 Q. So it would be fair to say I could write a
11 "no" for all of these, right?

12 A. Yes.

13 MR. FREEDMAN: Ms. Shen and members of the
14 jury, I apologize again about my terrible
15 handwriting.

16 We're going to mark this demonstrative as
17 Exhibit 14.

18 MR. UMHOFFER: Please note our objection.

19 MS. DEGTYAREVA: Yes. We object to this
20 exhibit.

21 (Exhibit 14 was received and marked for
22 identification, as of this date.)

23 MR. FREEDMAN: I think this might be a
24 good place for a break.

25 THE VIDEOGRAPHER: The time is 2:20 p.m.

1 affects children more than not, but I have no reason
2 to believe it wouldn't apply to children.

3 BY MR. FREEDMAN:

4 Q. Ms. Shen, I guess I'm just wondering as
5 the lead safety product manager who personally
6 believes that skin lightening features or filters
7 and other beautification features can have negative
8 impact on individuals' well-being, how much research
9 did you try to conduct into whether or not that was
10 true on Snapchat?

11 A. I'm not sure if I can quantify how much
12 research, but I did look for news articles or other
13 types of studies showing that this could be harmful.

14 Q. Did you ever raise these concerns with
15 anybody else at Snapchat?

16 A. Yes.

17 Q. Ms. Shen, does Snapchat still offer skin
18 lightening filters and beautification filters to
19 children?

20 MS. DEGTYAREVA: Objection, foundation.

21 MR. UMHOFFER: Join.

22 A. I'm sorry. I thought you said my name. I
23 think that right now on Snap, there are a lot more
24 user-generated lenses, meaning lenses that were
25 created by not Snap the company but by users of

1 Snapchat's product, and so I don't know if those
2 contain skin lightening features or not.

3 I still see face lenses, but I haven't
4 used Snapchat that often to try to figure out if
5 they're lightening my skin or not.

6 BY MR. FREEDMAN:

7 Q. How about this, ma'am. Did you ever
8 receive any notice while you were working at Snap
9 that Snap had terminated the use or accessibility of
10 skin lightening filters to children?

11 A. I vaguely remember hearing about how they
12 were going to work on removing skin lightening to
13 focus on other face features.

14 Q. Ma'am, my question was whether or not that
15 practice had stopped by the time you left Snapchat?

16 A. Not to my recollection.

17 Q. Sitting here today, you can't tell us that
18 Snapchat has removed all skin lightening filters for
19 users who have indicated that they're under the age
20 of 18?

21 MR. UMHOFFER: Objection, lacks foundation,
22 calls for speculation.

23 MS. DEGTYAREVA: Join.

24 A. I have never worked on the lens team and I
25 also don't know how the lens algorithm works in

1 A. I'm not sure what that means in this
2 context.

3 Q. What about in any context?

4 A. I think it's referring to the planning
5 process for how we would detect grooming.

6 Q. And you would agree with me that, based on
7 Mr. [REDACTED]'s statement, he's indicating that prior to
8 around May of 2022, Snap had not kickstarted the
9 grooming detection planning?

10 MS. DEGTYAREVA: Objection, speculation,
11 foundation.

12 MR. UMHOFFER: Join.

13 A. I can't speak to what [REDACTED] meant in that
14 moment. We've always worked on grooming, but I
15 believe this was a focused effort.

16 BY MR. FREEDMAN:

17 Q. Well, he doesn't use the words "focused
18 effort," right?

19 A. No.

20 Q. He doesn't say this is just going to be
21 another iteration of the type of detection planning
22 we've had in place for years?

23 A. We didn't have as much of our proactive
24 detection framework until [REDACTED] joined earlier in
25 2022.

1 Q. So you would agree with me that prior to
2 2022 when Mr. [REDACTED] started, Snap didn't have a
3 proactive grooming detection framework?

4 A. Yes.

5 Q. Mr. [REDACTED] continues. He says:

6 "It is probably the hardest problem, and
7 given our ephemeral product" -- and then there's an
8 emoji there or some sort of symbol.

9 Do you know what that is?

10 A. I believe it is what we called shrugging
11 in the tech industry. It's an emoji that's looks
12 like this (indicating) of a person shrugging.

13 Q. Gotcha. Now, he says here, that grooming
14 detection planning is the hardest problem.

15 Can you tell us what grooming is?

16 A. I believe in this context, and to the best
17 of my ability to explain it, grooming refers to a
18 form of child sexual exploitation in which an adult
19 through longterm or short-term behavior/engagement
20 with a child, develops a, quote/unquote,
21 relationship with the child.

22 Predators can also groom a child's parents
23 or guardians in order to gain more access to the
24 minor.

25 Q. Prior to 2022, Snap did not have a

1 MR. UMHOFFER: Objection, calls for
2 speculation, lacks foundation.

3 A. I don't know how I can remember something
4 that I don't remember. The question kind of
5 confused me.

6 BY MR. FREEDMAN:

7 Q. Ma'am, you'd agree with me that through --
8 you'd agree with me that Snap has never warned
9 parents about the existence of CSAM on its platform,
10 correct?

11 MS. DEGTYAREVA: Objection, speculation,
12 foundation.

13 A. There are multiple other teams that handle
14 outreach to parents and schools, as well as through
15 public feeds like Discover. But I wasn't on those
16 teams, so I'm not sure what they did and what they
17 didn't include in their materials.

18 BY MR. FREEDMAN:

19 Q. As the lead child safety product manager,
20 you weren't consulted by any of those teams about
21 these child safety issues, were you?

22 A. I don't remember.

23 Q. One thing we can agree on, hopefully, is
24 that you never warned parents about issues with
25 Snap's trust and safety teams, right?

1 MS. DEGTYAREVA: Objection, speculation,
2 foundation, vague and ambiguous.

3 A. I don't know.

4 BY MR. FREEDMAN:

5 Q. You never warned parents about issues with
6 the leadership team for Snap's trust and safety
7 team?

8 A. I don't believe so.

9 Also, can we take a quick break so I can
10 go to the restroom?

11 MR. FREEDMAN: Absolutely.

12 THE VIDEOGRAPHER: The time right now is
13 5:06 p.m. We're off the record.

14 (Recess.)

15 THE VIDEOGRAPHER: The time right now is
16 5:15 p.m. We're back on the record.

17 BY MR. FREEDMAN:

18 Q. Welcome back, Ms. Shen.

19 Before we went to break, we were talking a
20 little bit about harmful content on the Snapchat
21 platform.

22 I want to know, as the lead child safety
23 product manager, did you ever do any research about
24 whether Snapchat's content algorithms were feeding
25 harmful content to children?

1 the way that the algorithm feeds people under the
2 age of 18 sexual content. Are you aware that this
3 has happened on Snapchat?

4 MS. DEGTYAREVA: Objection, speculation,
5 foundation, assumes facts.

6 MR. UMHOFFER: Join.

7 A. I'm not aware.

8 BY MR. FREEDMAN:

9 Q. Just to be clear here, you're saying that,
10 as a former lead product safety manager responsible
11 for child safety areas, you're not aware of whether
12 or not the algorithm has ever fed sexual content to
13 children?

14 MR. UMHOFFER: Objection, asked and
15 answered.

16 A. Right.

17 BY MR. FREEDMAN:

18 Q. Well, ma'am, you'd agree that -- ma'am,
19 did you or anyone you know ever have any
20 conversations about consulting with school
21 counselors about the impacts of Snapchat on child's
22 education?

23 A. Not that I remember.

24 Q. What about any psychologists?

25 A. And just specifying, specifically on the

1 users and 50 percent of beta users, right?

2 A. Yes.

3 Q. In the section titled "Why are we doing
4 this," correct?

5 A. Yes.

6 Q. And what you write is: "In-app reporting
7 is a critical safety tool that has significant gaps
8 today."

9 I read that correctly?

10 A. Yes.

11 Q. Your assessment of the issues with this
12 critical safety tool were that it had significant
13 gaps; isn't that right?

14 A. I think that what this shows is that we
15 were always trying to find problems and challenges
16 with what we were doing, and once we found those
17 problems, we fixed them.

18 Q. Well, good job, because the problem you
19 found is that 96.7 percent of all existing account
20 reports did not lead to review; is that correct?

21 A. Right.

22 Q. And I guess you found this problem
23 sometime close to May 2022, right?

24 A. Yes.

25 Q. How long had Snap been allowing users to

1 report accounts?

2 A. Approximately four years.

3 Q. So for the first four years, 96.7 percent
4 of existing account reports didn't lead to any sort
5 of review, right?

6 MS. DEGTYAREVA: Objection. Misstates the
7 document, speculation, foundation.

8 MR. UMHOFFER: Join.

9 A. I'm not sure.

10 BY MR. FREEDMAN:

11 Q. Well, that's explicitly what you said,
12 right?

13 A. I don't think I listed the amount of time
14 in here.

15 Q. "96.7 percent of existing account reports
16 don't lead to review," is that what you said?

17 A. Yes.

18 Q. And it took you approximately four years
19 to identify and start to solve that issue with the
20 process, right?

21 MS. DEGTYAREVA: Objection. It assumes
22 facts and misstates the testimony in document.

23 MR. UMHOFFER: Join.

24 A. I can't remember when we found this, but
25 we did prompt them to block the other person that

1 they were reporting.

2 BY MR. FREEDMAN:

3 Q. Well, after you found it, did you delay
4 rolling out this feature?

5 A. We had to build a fix.

6 Q. How long did that take?

7 A. I don't remember.

8 Q. Okay. We can also agree that prior to
9 2023, Snap didn't even offer children the ability to
10 report predatory Snap text messages on the app,
11 right?

12 A. I left the company in 2022, so I'm not
13 really sure what happened afterward.

14 MR. UMHOFFER: Directing your attention to
15 tab 22, this is Exhibit -- we're going to mark
16 this 22.

17 (Exhibit 22 was received and marked for
18 identification, as of this date.)

19 BY MR. FREEDMAN:

20 Q. Ma'am, this document has a title that says
21 "Business Case: Chat Text Reporting," right?

22 A. Yes.

23 Q. And if you look about a third of the way
24 down the page, it says, "Product owners Abby Tran
25 and Juliet Shen," right?

1 CERTIFICATE

2
3 STATE OF NEW YORK)

4 : ss

5 I, Angela M. Shaw-Crockett, a Certified Court
6 Reporter, Registered Merit Reporter and Notary Public within
7 and for the States of New York, New Jersey and Connecticut,
8 do hereby certify:9 That JULIET SHEN, the witness whose deposition is
10 herein before set forth, was duly sworn by me and that such
11 deposition is a true record of the testimony given by such
12 witness.13 I further certify that I am not related to any of
14 the parties to this action by blood or marriage and that I
15 am in no way interested in the outcome of this matter.16 In witness whereof, I have hereunto set my hand
17 this 6th day of March, 202518
19 -----
20 ANGELA M. SHAW-CROCKETT, CCR, CRR, RMR, CSR
21 LICENSE NO. XI00218400
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