

Filed Under Seal

EXHIBIT I

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION/)
PERSONAL INJURY PRODUCTS) MDL No. 3047
LIABILITY LITIGATION)

SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE
COUNTY OF LOS ANGELES - SPRING STREET COURTHOUSE

COORDINATION PROCEEDING)
SPECIAL TITLE [RULE 3.400])
SOCIAL MEDIA CASES) Lead Case No.
22STCV21355

This Document Relates To)
STATE OF TENNESSEE, ex rel.)
JONATHAN SKRMETTI,)
ATTORNEY GENERAL and)
REPORTER,)
v.)
META PLATFORMS, INC., and)
INSTAGRAM, LLC.)

CONFIDENTIAL - ATTORNEYS' EYES ONLY
PURSUANT TO PROTECTIVE ORDER
VOLUME 1

VIDEO-RECORDED
DEPOSITION OF ARTURO BEJAR
(Pages 1 - 351)

Held at Baker Botts
1001 Page Mill Road, Palo Alto, California
Monday, April 7, 2025, 9:20 a.m.

- - - -
REPORTED BY: ELAINA BULDA-JONES, CSR 11720

1 what was the required minimum age for a kid to have
2 an account?

3 A. At the time, on Instagram, there was a
4 "don't ask, don't tell" policy.

5 Q. Okay. Was there a written --

6 MS. JONES: Let me just object to that
7 answer as nonresponsive to the question.

8 Go ahead.

9 THE WITNESS: Okay.

10 BY MR. CARTMELL:

11 Q. I'll restate the question.

12 In 2012, from that time until you left in
13 2015, at Meta, was there a written policy related to
14 the minimum required age for kids on Instagram?

15 A. There was not.

16 Q. Was the required age that people discussed
17 13? In other words, was there a terms of service or
18 something that stated that you had to be -- a kid
19 had to be 13 to be on Instagram?

20 A. No.

21 MS. JONES: Objection to the form.

22 BY MR. CARTMELL:

23 Q. What was your understanding while you were
24 at Meta from 2012 to 2015 about Instagram's age
25 verification policy?

1 MS. JONES: Objection. Foundation.

2 THE WITNESS: So I had many conversations
3 about this with many people, including the product
4 manager that I managed who was responsible for age
5 verification on Facebook. And those conversations,
6 it was common knowledge that there were young kids
7 using Instagram. And, I mean, that was a big reason
8 behind the accusation.

9 BY MR. CARTMELL:

10 Q. What do you mean, that was a big reason
11 behind the acquisition?

12 MS. JONES: Objection. Foundation.

13 THE WITNESS: In the conversations that I
14 had with many people at the time, that that was one
15 of the key reasons of the -- for the Instagram
16 acquisition.

17 BY MR. CARTMELL:

18 Q. Meta wanted the very young kids on their
19 social media apps?

20 MS. JONES: Same objections. Lack of
21 foundation.

22 THE WITNESS: Yes.

23 BY MR. CARTMELL:

24 Q. Let me ask you, so was it well-known at
25 Meta in 2012 to 2015 that there were kids on

1 Instagram who were under the age of 13?

2 MS. JONES: Objection. Foundation.

3 THE WITNESS: Yes.

4 BY MR. CARTMELL:

5 Q. Did leadership at Meta know that at that
6 time?

7 MS. JONES: Same objection.

8 THE WITNESS: I would have to think so
9 given how it was common knowledge in the
10 conversations that I had with the people working on
11 these issues.

12 BY MR. CARTMELL:

13 Q. And what, as far as you know, was the
14 policy that was being implemented there as far as
15 kids under 13 being on Instagram?

16 MS. JONES: Objection to the form.

17 THE WITNESS: I was not aware of any
18 policy being implemented about kids being under 13
19 on Instagram.

20 BY MR. CARTMELL:

21 Q. You mentioned don't ask, don't tell,
22 correct?

23 A. That is correct.

24 Q. What did you mean by that?

25 A. It means that you know that there are kids

1 under 13 there but you do not really talk about it
2 and you don't ask about it. Like, if you didn't
3 know somebody was under 13, then you didn't have to
4 do anything about it.

5 Q. Do you remember whether Instagram during
6 your first stint was asking kids for their age at
7 sign up?

8 A. They were not.

9 Q. When you returned to Meta in 2019,
10 October, do you know whether Instagram was asking
11 kids for their age when they would sign up for an
12 Instagram account?

13 MS. JONES: Objection. Foundation.

14 THE WITNESS: I believe they began asking
15 at some point in 2019 but I don't recall the
16 specific date.

17 BY MR. CARTMELL:

18 Q. Was your understanding that from 2012,
19 when Meta acquired Instagram, until sometime in
20 2019, Meta was not asking kids for their age when
21 they would sign up for an account?

22 A. Yes.

23 (Whereupon, a brief discussion off the
24 record.)

25 ///

1 BY MR. CARTMELL:

2 Q. Based on your understanding, when you
3 returned to Meta in 2019, was it still well-known
4 among the employees at Meta that there were kids on
5 Instagram who were younger than 13?

6 MS. JONES: Objection. Foundation.

7 THE WITNESS: Yes. But it was also
8 something you did not talk about.

9 BY MR. CARTMELL:

10 Q. Did you have any estimation from your
11 conversations or your work and research at Meta when
12 you returned in 2019 about the extent of the problem
13 with kids younger than 13 on Instagram?

14 MS. JONES: Same objection.

15 Excuse me. Objection. Form. And
16 foundation.

17 Go ahead.

18 THE WITNESS: I did not.

19 BY MR. CARTMELL:

20 Q. Do you believe that it was likely millions
21 and millions of kids?

22 A. Absolutely.

23 MS. JONES: Hold on.

24 Same objection to the foundation as
25 earlier.