

FILED UNDER SEAL

EXHIBIT 8

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

VIDEO-RECORDED

DEPOSITION OF ALISON LEE, Ph.D.

(Pages 1 - 465)

Covington & Burling

415 Mission Street, San Francisco, California

Thursday, February 6, 2025, 9:19 a.m.
- - - -

REPORTED BY: ELAINA BULDA-JONES, CSR 11720

1 used very vague language around "may" and "we don't
2 want that." But it didn't name that these are real
3 things that were happening nor the rate of those
4 experiences.

5 BY MR. DUNBAR:

6 Q. And your research led you to believe that
7 people were having those kinds of experiences,
8 right?

9 A. Yes. In fact, they were reporting them at
10 higher rates than what we were detecting.

11 Q. For example, we discussed several
12 studies -- strike that.

13 We looked at other studies like BEEF that
14 were not made public, right?

15 A. We looked at BEEF, yes.

16 Q. And you'd agree that the decision to not
17 be fully transparent about the risks that Instagram
18 posed to young users in particular, that lack of
19 transparency could lead to more harm?

20 MS. BARNHART: Object to form.
21 Characterization. Foundation.

22 THE WITNESS: I think that what they were
23 sharing in their CSER report was an -- a
24 deliberately incomplete picture in an underreporting
25 of the rate of harmful content and experiences that

1 were happening on our platform.

2 BY MR. DUNBAR:

3 Q. To that point, we looked at affirmative
4 statements by Meta that presented a slant impression
5 of Instagram's safety, such as CSERs and the
6 annotated slide decks, right?

7 MS. BARNHART: Object to the
8 characterization.

9 THE WITNESS: Yes.

10 BY MR. DUNBAR:

11 Q. Would you agree that by creating the
12 impression that Instagram was safer than it really
13 was, that could contribute negatively to youth
14 safety, too, right?

15 MS. BARNHART: Objection to the form.
16 Characterization. And foundation.

17 THE WITNESS: I think by underreporting
18 and diminishing the findings that were leaked, and
19 underreporting the prevalence of that, that they
20 prevented the public from understanding the rate and
21 severity of the risks that are associated with being
22 on the platform, particularly for young people.

23 BY MR. DUNBAR:

24 Q. You received some questions from Meta's
25 lawyer getting at the notion that integrity issues