

FILED UNDER SEAL

EXHIBIT 2

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 our internal detected prevalence of harm and
2 understand the mismatch between those two, that was
3 a very clear priority problem to solve.

4 Q. I'm going to hand you another document,
5 which will be Exhibit 23 -- 24. Pardon me.

6 (Whereupon, Meta-Lee Exhibit 24 was marked
7 for identification.)

8 BY MR. DUNBAR:

9 Q. Are you ready?

10 A. Yep.

11 Q. So just before we turn to this document, I
12 had one follow-up question about what you just said
13 about the BEEF survey.

14 You said that there was a mismatch between
15 Meta's internal detected prevalence and the
16 perceptions of harm represented in the BEEF survey
17 data; is that right?

18 A. Yes, that's right.

19 Q. Could you say more about what you mean by
20 the mismatch there?

21 A. This mismatch was that, consistently,
22 users were reporting, via BEEF and other TRIP
23 surveys and other similar methodologies, a rate of
24 having seen harmful content at a higher rate than
25 what our internal data, via prevalence, detected

1 prevalence was.

2 Q. Okay. So turning to this exhibit in front
3 of you, does this appear to be an e-mail you
4 received from Kyle Andrews during your tenure at the
5 company?

6 A. Yes, it does.

7 Q. Do you recall receiving this e-mail?

8 A. I mean, I don't remember...

9 Q. Do you have any reason to doubt that you
10 received this e-mail?

11 A. I have no reason to doubt that.

12 Q. Does this indicate to you that you
13 received access to the BEEF survey presentation?

14 A. Yeah. Yes.

15 Q. You can set that exhibit aside.

16 I'm going to hand you another exhibit,
17 which will be Exhibit 25.

18 (Whereupon, Meta-Lee Exhibit 25 was marked
19 for identification.)

20 THE WITNESS: Thank you.

21 BY MR. DUNBAR:

22 Q. Please feel free to take some time to
23 familiarize yourself with the document and let me
24 know when you're ready.

25 A. Uh-huh.

1 A. Yes, I do see that.

2 Q. Do you agree with me those are all
3 examples of audience and/or user content controls
4 that Instagram implemented?

5 MR. DUNBAR: Object to form. And
6 characterization.

7 THE WITNESS: Yes, and to see them in
8 summary through this and to see that this was housed
9 under a holistic approach to develop Teen Accounts
10 and a specific experience for teenagers to keep both
11 their content, their interactions, and their usage
12 all together in a bundle I think is very heartening.
13 And I have friends who are on that team that work
14 really hard at this and I'm really proud of them and
15 I'm really proud of their efforts on this.

16 And I'll note that this was released in
17 2024, September, which was certainly three years
18 after I was proposing this, and I was certainly not
19 alone in proposing many of these suggestions around
20 content restrictions, messaging, and unwanted
21 interactions, and a tailored experience for
22 teenagers.

23 In fact, those -- that research probably
24 dates back to, to my earliest knowledge, 2018, when
25 some of my colleagues were working on teen safety.