

FILED UNDER SEAL

EXHIBIT 3

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.

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REPORTED BY: ELAINA BULDA-JONES, CSR 11720

1 But the reality is what's on the left,
2 right. And so like prevalence is sort of grade your
3 own homework version of harm where they are looking
4 under the light but what's actually happening in the
5 bushes is what BEEF captures and what's happening in
6 the bushes is what people are experiencing.

7 Q. In your opinion as an online child safety
8 expert for 30 years, do you believe it's appropriate
9 for Meta to publish the prevalence data on the right
10 without publishing their internal data related to
11 the actual bad experiences that are occurring on
12 Instagram?

13 MS. JONES: Objection. Foundation.

14 THE WITNESS: I believe it's inappropriate
15 for them to do that because I think it's very
16 misleading.

17 BY MR. CARTMELL:

18 Q. And how long has Instagram been doing
19 this -- strike that.

20 How long has Meta been doing this,
21 publishing prevalence data without their internal
22 research?

23 MS. JONES: Objection. Foundation.

24 THE WITNESS: I don't recall when the
25 Transparency Center was initially published and when