

FILED UNDER SEAL

EXHIBIT 3

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION/)
PERSONAL INJURY PRODUCTS) MDL No. 4:22-md-3047-YGR
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.)

Case No. 23-1364-IV)

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF BRIAN BOLAND

APRIL 25, 2025

(Pages 1 - 422)

9:18 a.m. to 7:18 p.m.

Zuckerman Spaeder

2100 L Street, NW, Washington, DC 20037

Reported By: Amanda Blomstrom, RMR, CRR, and
CSR TX #8785/CA #12681/IL #84-3634

1 A. Correct.

2 Q. Do you agree that its basic business model
3 is the same as Facebook's?

4 MR. SNEED: Object to form.

5 THE WITNESS: Yes, I do.

6 BY MR. WARREN:

7 Q. Okay. Both Facebook and Instagram collect
8 data about users to target ads to them; yes?

9 A. Yes, they do.

10 Q. Both Facebook and Instagram earn a
11 majority of their revenue by showing ads to users;
12 yes?

13 A. Yes, they do.

14 Q. And you agree that both Facebook and
15 Instagram financially benefit when users see more
16 ads?

17 A. Yes, generally.

18 Q. And you agree that users of Facebook and
19 Instagram see more ads when they spend more time on
20 the platform; yes?

21 MR. SNEED: Object to form.

22 THE WITNESS: Yes.