

FILED UNDER SEAL

EXHIBIT 32

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT :MDL NO.
ADDICTION/PERSONAL INJURY PRODUCTS :4:22-MD-
LIABILITY LITIGATION :3047-YGR

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. FOR
THIS DOCUMENT RELATES TO: :FILING
:PURPOSES
STATE OF TENNESSEE, ex rel, JONATHAN :22STCV21355
SKRMETTI, ATTORNEY GENERAL and :
REPORTER, :
:
V. :
:
META PLATFORMS, INC., and INSTAGRAM, :
LLC :
:
CASE NO. 23-1364-IV :

DEPOSITION UNDER VIDEO EXAMINATION OF
VAISHNAVI JAYAKUMAR
JANUARY 30, 2025
VOLUME I

Videotaped deposition of
VAISHNAVI JAYAKUMAR, taken pursuant to notice, was
held at the law offices of Baker Botts, LLP, 30
Rockefeller Plaza, New York, New York, beginning at
9:24 a.m., on the above date, before Michelle L.
Ridgway, a Registered Professional Reporter,
Certified Court Reporter (NJ-CCR # XI02126),
Certified Realtime Reporter, Certified Shorthand
Reporter (CA-CSR # 14592), and Notary Public.

1 Do you agree with that?

2 A. Yes.

3 Q. And was this chat thread conducted
4 in the ordinary course of your work in Meta?

5 A. Yes.

6 Q. Can you explain to the jury who the
7 other folks on this chat are?

8 A. [REDACTED] and [REDACTED] were our safety
9 policy representatives in the Asia-Pacific region.
10 And then [REDACTED] was my child safety counterpart who
11 worked on all the other products outside of
12 Instagram.

13 Q. And that would include Messenger
14 and Facebook?

15 A. Yes.

16 Q. Okay. So the chat starts with
17 Ms. [REDACTED] She writes to you, Ms. [REDACTED] and
18 Ms. [REDACTED] Seems to indicate that some of Meta's
19 partners had been asking for in-app reporting for
20 underage accounts.

21 Do you agree with that?

22 A. Yes.

23 Q. What does "in-app reporting" mean?

24 A. So at the time, if you wanted to
25 report a user for being under 13, you had to go to

1 a web form. And so, you know, go out of the app
2 essentially, go to a form and then report that
3 account for being under 13.

4 She was asking whether we could
5 just include it within the app itself. So within
6 the app, if you click on a piece of content now,
7 you can report it for a variety of violations. She
8 was asking if we could also include an option to
9 report the account within the app itself for being
10 underage.

11 Q. Would that have facilitated more
12 reports of under-13 Instagram users?

13 A. Yes. It's a much faster, much more
14 seamless way to report users.

15 Q. So is it fair to say that prior to
16 March 23, 2021, that in-app reporting option did
17 not exist on Instagram for the reporting of
18 underage users?

19 A. Yes. That's accurate.

20 Q. Okay. Now, you respond to
21 Ms. [REDACTED] What was your response?

22 A. I said that I think we would
23 have -- do you want me to read it out or?

24 Q. Well, you can read it out, but I
25 also want to know what you were thinking.

1 under-13-age users, right?

2 A. Yes.

3 Q. Okay.

4 MR. SNEED: Object to form. Sorry.

5 BY MR. WARREN:

6 Q. Okay. And then she provides what
7 she calls a data point. I'm going to quote here.
8 She says:

9 For reporting, currently there's no
10 way for users to report under-13 users on Facebook
11 in-app and it takes over seven screens for users to
12 report under-13 users on Instagram.

13 Did I read that correctly?

14 A. Yes.

15 Q. Do you have any reason to doubt the
16 accuracy of what Ms. [REDACTED] said?

17 A. No. [REDACTED] was very well-plugged
18 into our child safety work.

19 Q. Okay. And then she goes on to say:
20 On enforcement, we currently have a
21 backlog of over 2.5 million cases age-related
22 reports to review.

23 Do you see that?

24 A. Yes.

25 Q. Do you have any reason to doubt the