

FILED UNDER SEAL

EXHIBIT 10

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 BY MR. CARTMELL:

2 Q. You mentioned that there were no metrics
3 in place; is that right?

4 MS. JONES: Objection to form.

5 BY MR. CARTMELL:

6 Q. Strike that.

7 You mentioned that one of the steps to
8 have an appropriate safety framework is that there
9 needs to be metrics in place for safety, correct?

10 A. Correct.

11 Q. Do you believe that Instagram had
12 appropriate metrics in place for safety?

13 A. They did not.

14 Q. Do they today? Do you know?

15 A. I don't know.

16 Q. Real quick, I want to ask you about when
17 you went back in 2019, did you actually also look at
18 the Facebook reporting flow?

19 A. Yes, I did.

20 Q. And did you actually also find that the
21 Facebook reporting flow was flawed?

22 A. Yes, I did.

23 Q. What did you find?

24 A. So I found that they had brought back a
25 lot of the changes that we had done, which led to

1 more accurate reports and reducing the number of
2 reports that needed to be reviewed. And so I spoke
3 to the -- both the product manager and the
4 engineering manager for their team at Facebook that
5 was responsible for the reporting tools.

6 Q. And what did you find out?

7 A. I found out that, in the words of the
8 engineering manager -- well, I'm not going to -- let
9 me tell you what I found out and -- and as a result
10 of the conversations I had with all of them.

11 So this is not one person, but it was,
12 like, multiple people said this. The manager for
13 the team, the product manager, and the engineering
14 manager.

15 And what I learned from talking to them
16 was that they had had some difficulty maintaining
17 some of the older flows that were based on previous
18 infrastructure. So they removed the flows, at which
19 point reporting went up significantly, and they did
20 not have enough people to review.

21 So they adjusted the flow to add something
22 called friction, which is add steps that make people
23 drop off, so they don't complete the task, and that
24 they had always added a blue button that people
25 clicked in the knowledge that they believe they had

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