

FILED UNDER SEAL

EXHIBIT 19

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 used very vague language around "may" and "we don't
2 want that." But it didn't name that these are real
3 things that were happening nor the rate of those
4 experiences.

5 BY MR. DUNBAR:

6 Q. And your research led you to believe that
7 people were having those kinds of experiences,
8 right?

9 A. Yes. In fact, they were reporting them at
10 higher rates than what we were detecting.

11 Q. For example, we discussed several
12 studies -- strike that.

13 We looked at other studies like BEEF that
14 were not made public, right?

15 A. We looked at BEEF, yes.

16 Q. And you'd agree that the decision to not
17 be fully transparent about the risks that Instagram
18 posed to young users in particular, that lack of
19 transparency could lead to more harm?

20 MS. BARNHART: Object to form.
21 Characterization. Foundation.

22 THE WITNESS: I think that what they were
23 sharing in their CSER report was an -- a
24 deliberately incomplete picture in an underreporting
25 of the rate of harmful content and experiences that

1 were happening on our platform.

2 BY MR. DUNBAR:

3 Q. To that point, we looked at affirmative
4 statements by Meta that presented a slant impression
5 of Instagram's safety, such as CSERs and the
6 annotated slide decks, right?

7 MS. BARNHART: Object to the
8 characterization.

9 THE WITNESS: Yes.

10 BY MR. DUNBAR:

11 Q. Would you agree that by creating the
12 impression that Instagram was safer than it really
13 was, that could contribute negatively to youth
14 safety, too, right?

15 MS. BARNHART: Objection to the form.
16 Characterization. And foundation.

17 THE WITNESS: I think by underreporting
18 and diminishing the findings that were leaked, and
19 underreporting the prevalence of that, that they
20 prevented the public from understanding the rate and
21 severity of the risks that are associated with being
22 on the platform, particularly for young people.

23 BY MR. DUNBAR:

24 Q. You received some questions from Meta's
25 lawyer getting at the notion that integrity issues