

FILED UNDER SEAL

EXHIBIT 52

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA
ADOLESCENT ADDICTION/
PERSONAL INJURY PRODUCTS MDL No. 3047
LIABILITY LITIGATION

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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

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This Document Relates To
STATE OF TENNESSEE, ex rel.
JONATHAN SKRMETTI,
ATTORNEY GENERAL and
REPORTER,
v.
META PLATFORMS, INC., and
INSTAGRAM, LLC.

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CONFIDENTIAL - ATTORNEYS' EYES ONLY
PURSUANT TO PROTECTIVE ORDER
VOLUME 2

VIDEO-RECORDED DEPOSITION OF ARTURO BEJAR
(Pages 352 through 751)

Held at Baker Botts
1001 Page Mill Road, Palo Alto, California
Tuesday, April 8, 2025

Stenographically reported by:
LORRIE L. MARCHANT, RMR, CRR, CCRR, CRC
California CSR No. 10523
Washington CSR No. 3318
Oregon CSR No. 19-0458
Texas CSR No. 11318
Job No.: MDLG 7222558

1 2011, did you indicate that building parental
2 supervision feature on -- at that time presumably
3 Facebook would have helped kept -- keep kids safe on
4 the platform?

5 A. Yes, in the context that the company was
6 thinking about having kids under 13 on the platform.

7 And the question is, how do you design
8 parental supervision so that it helps parents and
9 kids to be safe online.

10 Q. Was it your assessment in 2011 as a -- let
11 me withdraw that.

12 Were you managing engineers within Meta in
13 2011?

14 A. Yes.

15 Q. Was it your assessment in 2011 that Meta
16 had the engineering capacity to build a parental
17 supervision tool?

18 MS. JONES: Objection. Foundation.

19 THE WITNESS: Yes.

20 BY MR. PHELPS:

21 Q. Do you know why Meta didn't build parental
22 supervision tools until 11 years later?

23 A. During the time that I was there, building
24 parental tools that helped people between 13 and 15,
25 at least self-declared people between 13 and 15, on

1 the platform was not a priority.

2 Q. As someone who's worked in the area of
3 online safety for many years, do you think it would
4 have been prudent for Meta to build parental
5 supervision tools much, much earlier than 2022?

6 MS. JONES: Objection to the form.
7 Foundation.

8 THE WITNESS: Absolutely. I think that at
9 the moment that Instagram had all of these sort of
10 features that allowed contact and content and it was
11 made available to young people, that that is the
12 moment at which they should have started developing
13 and continued to develop tools that meaningfully
14 supported parents and kids in the partnership of
15 being safe online.

16 BY MR. PHELPS:

17 Q. Based on this press release, is it your
18 understanding that the parental tools that the
19 company launched in 2022 was an opt-in feature?

20 A. Yes.

21 Q. Based on this press release, is it your
22 understanding that the parental supervision tools
23 the company launched in 2022 was something you had
24 to navigate into the settings to activate?

25 MS. JONES: Objection to the form.