

FILED UNDER SEAL

EXHIBIT 80

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT) MDL Number:
ADDICTION/PERSONAL INJURY PRODUCTS) 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. for
Filing Purposes) 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

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VIDEOTAPED DEPOSITION of
DARIUS KILSTEIN, VOLUME I
Palo Alto, California
December 17, 2024

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JENNY L. GRIFFIN, CSR No. 3969 - RMR, CRR, CCRR, CRC

1 age group; right?

2 A. I believe there was some research on this
3 slide deck.

4 Q. You also looked -- I'm going to get to the
5 document in a minute.

6 You also looked at some research about
7 tween users; right?

8 A. That's not an area that I worked on.

9 Q. I'm not asking if -- maybe I asked an
10 inartful question. It does happen. Let's just do
11 it this way.

12 Earlier, when Ms. Gotwals was questioning
13 you, she showed you some documents referencing
14 research about users who were younger than 13 years
15 old; right?

16 MR. SCHMIDT: Objection. Foundation and
17 characterization.

18 THE WITNESS: She showed me some documents
19 which had the words "tweens" on them. I don't
20 recall exactly what was in those documents.

21 BY MR. OLIVER:

22 Q. So you understand that the term "tween"
23 means users who are younger than 13 years old;
24 correct?

25 A. I don't know the exact definition, but I