

**FILED UNDER SEAL**

**EXHIBIT 86**

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           A.    Yes, I do see that.

2           Q.    Do you agree with me those are all  
3 examples of audience and/or user content controls  
4 that Instagram implemented?

5           MR. DUNBAR:  Object to form.  And  
6 characterization.

7           THE WITNESS:  Yes, and to see them in  
8 summary through this and to see that this was housed  
9 under a holistic approach to develop Teen Accounts  
10 and a specific experience for teenagers to keep both  
11 their content, their interactions, and their usage  
12 all together in a bundle I think is very heartening.  
13 And I have friends who are on that team that work  
14 really hard at this and I'm really proud of them and  
15 I'm really proud of their efforts on this.

16           And I'll note that this was released in  
17 2024, September, which was certainly three years  
18 after I was proposing this, and I was certainly not  
19 alone in proposing many of these suggestions around  
20 content restrictions, messaging, and unwanted  
21 interactions, and a tailored experience for  
22 teenagers.

23           In fact, those -- that research probably  
24 dates back to, to my earliest knowledge, 2018, when  
25 some of my colleagues were working on teen safety.