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EXHIBIT F

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT) MDL No.
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

VIDEO DEPOSITION OF JOSHUA SIMONS MP

April 1, 2025

Reporter: John Arndt, CSR, CCR, RDR, CRR
CSR No. 084-004605
CCR No. 1186

1 Is the consideration -- during your time with
2 the company, was the consideration -- strike that.

3 In your example that you just provided of the
4 toxicity model and integrity classifier, could you --
5 is that -- was that different from how the machine
6 learning models operated in -- strike that. Let me
7 figure out the best way to ask you this question.

8 Does the -- does the ranking system generally
9 consider the subject matter of an item in ranking that
10 item in a user's feed?

11 MR. HALPERIN: Object to foundation.

12 A. By subject matter, do you mean the content
13 of a post?

14 BY MS. CARROLL:

15 Q. To clarify, I mean, does the machine
16 learning system have a ideology or viewpoint of the
17 context of the substance of an item?

18 MR. HALPERIN: Objection. Vague.

19 A. So the -- let me -- let me say this, and
20 you tell me if this doesn't answer that question. I'm
21 just trying to -- these are complicated concepts, so
22 I'm just trying to make sure that I answer the question
23 directly.

24 The ranking system's impetus, what it's aiming
25 to do, is set by the topline metric. And in Facebook's

1 case, that was meaningful social interactions,
2 different forms of engagement.

3 What the ranking system does, and the machine
4 learning models that go into it, is predict whether a
5 particular piece of content, given what we can observe
6 about that content, whether it's a picture or a video,
7 whether it's of kids or adults or sports games or
8 whatever, is likely, if the ranking model shows you
9 that piece of content, to elicit the kind of engagement
10 that meaningful social interactions rewards.

11 So that might be in particular sharing pieces of
12 content. The ranking system will look at the features
13 of a particular piece of content. "It's a video. In
14 the past this user has engaged with videos more than
15 pictures. It's of something to do with their -- the
16 street that they live in and a particular house on the
17 street that folks don't like in this community group,
18 and that's tended to produce lots of shares of content
19 in the past. And it's bright and colorful, and that's
20 tended to produce shares in the past."

21 And then on the basis of that information about
22 the particular piece of content and the past behavior
23 of all users, it will use its prediction of engagement,
24 so it says, "Actually, we think this is really likely
25 to elicit a share from this user," and then it will

1 rank that high on their News Feed.

2 And so using the analogy in the book, when
3 someone's entering a public square, it's a bit like the
4 people who are handing out leaflets or literature or
5 information thinking, "Okay, we want that person to go
6 and do jumping jacks in the middle of the square while
7 shouting loudly about something. We know from
8 everything we've observed in the past that this kind of
9 leaflet is most likely to get this person coming into
10 the square to do jumping jacks and shout loudly, so
11 we're going to give them that leaflet first."

12 And that's the basic way that the ranking system
13 determines how to order the thousands of things it
14 could show to anyone, and therefore determine what you
15 open when you open Facebook on your phone.

16 BY MS. CARROLL:

17 Q. So going back to Page 137. Towards the
18 bottom of the page here, where it says -- it starts
19 with, "Although." "Although the corporation."

20 Do you see where I am?

21 A. Yes.

22 Q. It says, "Although the corporation cannot
23 determine which pamphlet each individual receives as
24 they enter the square, the corporation doesn't much
25 care about each individual. What it cares about are

1 aggregate effects, how the collective mood responds to
2 different ways of ranking information and ideas.
3 Similarly, Facebook designs News Feed by considering
4 how best to maximize its topline metric, not the
5 particular content to show individuals."

6 Did I read that correctly?

7 A. You did.

8 Q. And is that a fair representation of your
9 understanding of how Meta ranked information during
10 your time with the company?

11 A. It is. And it stems specifically from my
12 conversations with News Feed and integrity product
13 leaders, VPs, and engineers in the wake of -- the
14 aftermath of the meaningful social interaction rollout
15 in 2018.

16 Q. Thank you. Is there anything else or any
17 other specific examples from your time with the company
18 that you think -- scratch that.

19 Are there any other examples that you personally
20 encountered during your time with the company where
21 Meta chose profits over user safety?

22 MR. HALPERIN: Object to form.
23 Foundation. And misstates testimony.

24 A. Yes, there are -- there are several which
25 I can mention. I guess the first and in some ways most