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EXHIBIT O

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
VOLUME 1

VIDEO-RECORDED
DEPOSITION OF MOIRA BURKE
(Pages 1 - 410)

Covington & Burling
415 Mission Street, San Francisco, California
Tuesday, January 28, 2025, 9:06 a.m.

- - - -
REPORTED BY: ELAINA BULDA-JONES, CSR 11720

1 kind of reading or scrolling through information.
2 And so here, he says, "We're realizing story
3 consumption on Instagram is largely passive."

4 I think what he's saying is that stories
5 are photos and videos and you just click on the
6 first one and you can watch several in a row without
7 necessarily interacting with the person, or at least
8 at the time. I think there are a bunch of
9 interaction mechanisms in them now, like comments
10 and likes and things.

11 Q. And he says, after that he says, "so are
12 looking for ways to improve that."

13 Do you see that?

14 A. Yes.

15 Q. Do you have an understanding as to what he
16 means by "looking for ways to improve that"?

17 MS. BARNHART: Objection. Foundation.

18 THE WITNESS: So I don't know specifically
19 what he means. He might mean ways to interrupt this
20 passive experience. So stop people after looking --
21 in between stories or increasing opportunities to
22 interact with other people over stories like liking
23 and commenting.

24 BY MR. JANSSEN:

25 Q. And in the next Chat to Mr. [REDACTED] you

1 write, "Yes. So glad you are working on it. In a
2 study a few months on problematic use," in
3 parentheses, "when people feel like they can't
4 control how much time they spend on Facebook," end
5 parentheses, "story inventory was one of the biggest
6 predictors," parentheses, "even after controlling
7 for demographics," end parentheses.

8 Did I read that correctly?

9 A. Yes, that's right.

10 Q. What is story inventory that's referenced
11 in your Chat to Mr. [REDACTED]?

12 A. So story inventory would be the number of
13 possible stories you could have watched on
14 Instagram. I don't know in this specific study if
15 we actually meant the number of stories you did
16 watch or just the number of stories that people you
17 follow had created and you might have been able to
18 watch.

19 Q. And what was it one of the biggest
20 predictors of?

21 A. So it looks like it had one of the,
22 according to what I wrote here, the strongest
23 correlations with problematic use. So the survey
24 measures about feeling a lack of control over your
25 Facebook use or you're feeling like that it had an

1 impact on your life, like your relationships or your
2 work.

3 Q. I'm sorry. Story inventory could have the
4 impact on relationships and work. Is that what you
5 were explaining?

6 A. So I -- what we found was that the more
7 potential stories a person had to the more story
8 content that people they followed had created, the
9 more likely they were to report more frequent
10 measures of problematic use. So feeling like they
11 have difficulty controlling how much time they spend
12 on Facebook and they felt like it was interrupting
13 or interfering with their life.

14 So that's what we were finding, that we
15 looked at a bunch of different experiences on
16 Facebook and we found that kind of accounting for
17 demographics, it looks like how many stories that
18 you possibly could have seen was one of the larger
19 predictors, meaning one of the features or pieces of
20 data that had the -- one of the stronger
21 correlations with problematic use survey measures.

22 Q. Does story inventory for users on Facebook
23 have a cap to it?

24 A. I don't know specific details, but I
25 believe stories are typically prioritized or come

1 from content that you follow. So I think it
2 probably depends on how many accounts somebody
3 follows. But I actually don't know the technical
4 implementation details, if there's a -- what the
5 limits might be.

6 Q. Do you know one way or another if there is
7 a limit to story inventory for users on Facebook?

8 MS. BARNHART: Objection. Asked and
9 answered.

10 THE WITNESS: I don't know the technical
11 details. I think it has to do with how many
12 accounts you follow. But I don't know if there's a
13 limit.

14 BY MR. JANSSEN:

15 Q. You then write, "Our guess was that people
16 feel like they have to watch all of the stories
17 offered to them, and it removes a sense of control
18 over time spent/experience or makes them feel like
19 they have to log on" -- excuse me -- "feel like they
20 have to log in frequently."

21 Did I read that correctly?

22 A. Yes, that's right.

23 Q. And then you -- you wrote there that that
24 was your guess. Why did you write that as that that
25 was your guess?

1 A. So this study that we ran just found that
2 people who had more stories they could potentially
3 watch reported greater social comparison but we
4 didn't know why we found that connection so we made
5 some guesses based on what we know about stories.

6 So stories are ephemeral. They disappear
7 after 24 hours. So we thought that could be one
8 reason why people are reporting problems with
9 problematic use. That they might feel like they
10 have to log in more often to catch stories before
11 they disappear.

12 And also, another possible guess, or like
13 another guess that we had, was that once you start
14 watching a story, it goes to the next story and the
15 story after that and perhaps that is why people feel
16 like they don't have a sense of control.

17 Q. You write, "The study was about Facebook,
18 but we expect the results would generalize to
19 Instagram, too."

20 Did I read that correctly?

21 A. Yes, that's right.

22 Q. Why would you expect that the results
23 would generalize to Instagram, too?

24 A. Because there weren't a lot of details
25 about our study that were specific to Facebook,