

Filed Under Seal

EXHIBIT E

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT) MDL No.
ADDICTION/PERSONAL INJURY) 4:22-md-3047-YGR
PRODUCTS 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]) Lead Case No.
) 22STCV21355
SOCIAL MEDIA CASES)

-----)
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)
-----)

Monday, March 17, 2025

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
Video-Recorded Oral Deposition of
ADAM S. MOSSERI held at the offices of
Covington & Burling LLP, Salesforce Tower,
415 Mission Street, Suite 5400, San
Francisco, California, commencing at
9:14 a.m. PST on the above date, before
Michael E. Miller, Fellow of the Academy of
Professional Reporters, Certified Court
Reporter, Registered Diplomate Reporter,
Certified Realtime Reporter and California
CSR #13649.

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DEPOSITION EXHIBITS

Meta-Mosseri-46 Short Message Report, 436
META3047MDL-050-00366410 -
META3047MDL-050-00366411

1 Our overall company goal is
2 total teen time spent, which is MAP times MAP
3 over -- so monthlies over dailies times time
4 spent over dailies. Sub-goal -- sorry I
5 should stop.

6 Q. So MAP is?

7 A. Monthly active people.

8 Q. And DAP?

9 A. Daily active people.

10 Q. TS?

11 A. Time spent.

12 Q. And then you see -- so you saw
13 there where it says the company's overall
14 goal is total teen time spent?

15 A. I see that.

16 Q. And then if you go on and you
17 go to the slide deck now on page 4, it says
18 it's a Teens Strategic Focus?

19 A. Sorry, I'm struggling with the
20 numbers. Can you give me the slide number?
21 It might be easier.

22 Q. It's the cover page of the
23 slide.

24 A. Oh, sorry.

25 MS. JONES: Are you referring

1 to the thing -- at the top. He's
2 looking at the numbers at the top.

3 A. Oh, I was going to say I'm
4 looking at two different page numbers that
5 are different. Apologies.

6 BY MR. RAVIPUDI:

7 Q. Yeah, so in the upper right,
8 the .4?

9 A. I'm happy to go with whatever
10 number you like as long as -- so we'll do
11 upper right.

12 Q. Fair.

13 A. Yes, you asked if I saw that it
14 says 2017 Teens Strategic Focus.

15 Q. And there's a team within Meta
16 called the Teens team?

17 A. I believe so.

18 Q. And that Teens team is focused
19 on teen growth?

20 A. I believe that team was within
21 the Facebook app, and they were focused on
22 what we would call product market fit, so
23 making sure that we're creating something
24 that resonates with teens. Growth would be
25 one way they measure that.

1 Q. And the 2017 -- what's a
2 top-line goal?

3 A. An important goal.

4 Q. Okay. If you go to .8.

5 A. I'm there.

6 Q. Do you see the 2017 Top-Line
7 Goal?

8 A. That's the name of the slide,
9 yes.

10 Q. Yep. The strategic goal is
11 time spent share, right?

12 A. Yes.

13 Q. And aggregate total time spent
14 is the operational metric?

15 A. Yes.

16 Q. So would you agree, in 2016,
17 Meta's overall goal was teen time spent?

18 MS. JONES: I'm going to object
19 to form and to characterization of the
20 document.

21 You can answer.

22 A. I believe -- did you mean to
23 ask for 2017?

24 BY MR. RAVIPUDI:

25 Q. Yes.

1 MS. JONES: Same objection.

2 A. Yes, Mark is suggesting that
3 teen time spent be our top goal in 2017.

4 BY MR. RAVIPUDI:

5 Q. You're not here to dispute that
6 that was the top-line goal in 2017?

7 A. I don't know that we ever had
8 one top-line goal, but it's certainly
9 something that we cared about, as I said
10 before, an important goal in 2017.

11 MR. RAVIPUDI: Can we have
12 1190.

13 THE WITNESS: Is that another
14 exhibit?

15 MR. RAVIPUDI: Yeah.

16 THE WITNESS: Going on to
17 number 9?

18 MR. RAVIPUDI: Exhibit 8 -- or
19 9.

20 MS. JONES: 9.

21 MR. RAVIPUDI: Thank you.

22 (Whereupon, Meta-Mosseri-9,
23 E-mail(s) re: Teens and News Feed
24 Alignment, META3047MDL-003-00134794 -
25 META3047MDL-003-00134796, was marked