

Filed Under Seal

EXHIBIT N

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

Deposition of Joshua Simons MP, taken pursuant to Notice of Taking Deposition, before John Arndt, a Certified Shorthand Reporter and Certified Court Reporter, at Mishcon de Reya, LLP, 70 Kingsway, London, WC2B 6AH, United Kingdom, on April 1, 2025.

APPEARANCES OF COUNSEL

On Behalf of the MDL, personal injury, and school district plaintiffs:

Motley Rice LLC
28 Bridgeside Boulevard
Mt. Pleasant, SC 29464
843-216-9328
By: Jessica L. Carroll
jcarroll@motleyrice.com
Andrew Arnold
aarnold@motleyrice.com
Previn Warren (via videoconference)
Pwarren@motleyrice.com

On Behalf of the Witness:

Levy Firestone Muse LLP
900 17th Street NW, Suite 1200
Washington, DC 20006
202-845-3215
By: Joshua Levy
jal@levyfirestone.com

On Behalf of Meta Platforms, Instagram, and Siculus:

Covington & Burling LLP
620 Eighth Avenue
New York, NY 10018
212-841-1166
By: Gregory L. Halperin
ghalperin@cov.com
Brian Reiser
breiser@cov.com

On Behalf of Meta:

Bass, Berry & Sims PLC
100 Peabody Place, Suite 1300
Memphis, TN 38103
901-543-5966
By: Jordan Thomas (via videoconference)
jordan.thomas@bassberry.com

1 On Behalf of Snapchat:

Skadden, Arps, Slate, Meagher & Flom (UK) LLP

2 22 Bishopsgate

London, EC2N 4BQ

3 +44 20 7519 7239

By: Devaanjana Goel (via videoconference)

devaanjana.goel@skadden.com

5 On Behalf of TikTok:

King & Spalding LLP

6 633 West Fifth Street, Suite 1600

Los Angeles, CA 90071

7 213-443-4351

By: Brittany Litzinger (via videoconference)

blitzinger@kslaw.com

Rachel Yeung (via videoconference)

ryeung@kslaw.com

10 On Behalf of the State of Massachusetts:

Massachusetts Attorney General's Office

11 Civil Rights Division

One Ashburton Place

12 Boston, MA 02108

617-963-2278

13 By: Adam Cambier

adam.cambier@mass.gov

14 On Behalf of the State of New Jersey:

15 State of New Jersey

Department of Law and Public Safety

16 124 Halsey Street, 9th Floor

Newark, NJ 07101

17 609-712-2828

By: Verna J. Pradaxay

verna.pradaxay@law.njoag.gov

Mandy K. Wang (via videoconference)

mandy.wang@law.njoag.gov

20 On Behalf of the State of Arkansas:

Robbins Geller Rudman & Dowd LLP

21 420 Lexington Avenue, Suite 1832

New York, NY 10170

22 212-432-5100

By: Ana S. Avalos Cuellar (via videoconference)

aavalos@rgrdlaw.com

1 On Behalf of the State of Kentucky:

Office of the Kentucky Attorney General

2 Office of Consumer Protection

1024 Capital Center Drive, Suite 200

3 Frankfort, Kentucky 40601

502-892-8538

4 By: Matthew C. Cocanougher (via videoconference)

matthew.cocanougher@ky.gov

5 Zachary Richards (via videoconference)

zach.richards@ky.gov

6 On Behalf of the State of Tennessee ex rel. Skrmetti:

7 Eimer Stahl LLP

1999 South Bascom Avenue, Suite 1025

8 Campbell, CA 95008

408-889-1668

9 By: Collin Vierra (present via videoconference)

cvierra@eimerstahl.com

10 Also present:

11 Jennifer Luong, paralegal

12 Levy Firestone Muse LLP

13 Brady Freeman (via videoconference)

Associate General Counsel

14 Meta Platforms, Inc.

15 Laurel K. Lackey (via videoconference)

Martin & Seibert, L.C.

16 James Arndt, videographer

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX OF INTERROGATION

Examination by Mr. Carroll	Page 8
Examination by Mr. Halperin	Page 126
Examination by Mr. Carroll	Page 233
Examination by Mr. Halperin	Page 234

INDEX OF EXHIBITS

Exhibit Meta-Simon-1 (Curriculum vitae)	Page 14
Exhibit Meta-Simon-2 ("Algorithms for the People" book)	Page 16
Exhibit Meta-Simon-3 (Federal Trade Commission letter)	Page 61
(META3047MDL-111-00339296 - META3047MDL-111-00339305)	
Exhibit Meta-Simon-4 (E-mail)	Page 69
(META3047MDL-111-00348216)	
Exhibit Meta-Simon-5 (Ethics at Facebook: Principles and Processes)	Page 73
(META3047MDL-019-00038026 - META3047MDL-019-00038055)	
Exhibit Meta-Simon-6 (E-mail)	Page 86
(META3047MDL-014-00047743)	
Exhibit Meta-Simon-7 (Political Strategy: Goals and Processes)	Page 87
(META3047MDL-014-00047780 - META3047MDL-014-00047785)	
Exhibit Meta-Simon-8 (Machine Learning: A Political Strategy)	Page 87
(META3047MDL-014-00047744 - META3047MDL-014-00047779)	
Exhibit Meta-Simon-9 (A Vision for Responsible AI)	Page 100
(META3047MDL-040-00233670 - META3047MDL-040-00233714)	
Exhibit Meta-Simon-10 (You and the Algorithm: It Takes Two to Tango)	Page 111

1	Exhibit Meta-Simon-11	Page 129
	(E-mail with attachment)	
2	(META3047MDL-040-00229743 - META3047MDL-040-00229748)	
3	Exhibit Meta-Simon-12	Page 132
	(Central Social Impact All-Hands)	
4	(META3047MDL-201-00000003 - META3047MDL-201-00000031)	
5	Exhibit Meta-Simon-13	Page 144
	(Responsible AI)	
6	Exhibit Meta-Simon-14	Page 154
7	(System Cards, an new resource for	
	Understanding how AI systems work)	
8	Exhibit Meta-Simon-15	Page 156
9	(Introducing 22 system cards that explain	
	how AI powers experiences on Facebook and Instagram)	
10	Exhibit Meta-Simon-16	Page 162
11	(Our approach to explaining ranking)	
12	Exhibit Meta-Simon-17	Page 165
	(Instagram Feed Recommendations AI system)	
13	Exhibit Meta-Simon-18	Page 179
14	("Algorithms for the People" book)	
15	Exhibit Meta-Simon-19	Page 188
	(Toward fairness in personalized ads)	
16	Exhibit Meta-Simon-20	Page 213
17	(Utilities for Democracy: Why and How the	
	Algorithmic Infrastructure of Facebook and	
18	Google Must Be Regulated)	
19	Exhibit Meta-Simon-21	Page 219
	(Fairness On The Ground: Applying	
20	Algorithmic Fairness Approaches To Production Systems)	
21	Exhibit Meta-Simon-22	Page 225
	(Suicide, Self-Injury, and Eating Disorders)	

(All exhibits are attached.)

1 that it has about you, and it was showing mum -- women
2 who just had children ads for things that would sort of
3 make them feel bad about their body in some way, you
4 know, like body cream or body adjustment surgery or
5 whatever.

6 And the conversation we talked about was
7 whether -- what's of value to a user in the organic bid
8 component -- you could change that. You could redefine
9 it. So instead of making people feel -- click on ads
10 because they feel shame about their body after they've
11 had a baby, maybe there would be some kind of
12 higher-order goal that you could put into that
13 component of the ad delivery system like, how do I
14 breastfeed, or you know, are there any downsides to
15 bottle? Whatever.

16 And [REDACTED] talked about how he'd, you know, worked
17 on some different ways of changing that component of
18 the ad system, but had been unable to get those things
19 rolled out, because ultimately they were less efficient
20 or effective, and what that meant in that context was
21 they would result in fewer ads being clicked on and
22 therefore less revenue generated by the ad delivery
23 system.

24 BY MS. CARROLL:

25 Q. Thank you. On Page 6 of this document,

1 the last bullet point says, "Psychological impacts.
2 The platforms have, as some have argued, become an
3 obsession for many. Some additionally argue that this
4 tendency is designed into the applications designed by
5 the leading platform companies. These features may
6 have exacerbated impacts on children."

7 My question for you, Mr. Simons, is at the time
8 you were employed by Facebook, did you have any insight
9 or awareness into the potential for psychological harm
10 to vulnerable users, like children?

11 MR. HALPERIN: Object to form.
12 Foundation. And the preamble.

13 MR. LEVY: I'm sorry. What was the last
14 objection?

15 MR. HALPERIN: The preamble.

16 MR. LEVY: Okay.

17 A. Yes, I had discussions about both the
18 psychological impacts that the system would have and
19 could have on users and discussions about that
20 particularly in the context of vulnerable users,
21 including kids.

22 And I had discussions about each of those
23 separate to the other, if that makes sense. So
24 psychological impacts about all users, and also
25 specifically separate conversations about kids.

1 BY MS. CARROLL:

2 Q. Was addiction or addictive properties a
3 part of that discussion with anyone during your time at
4 Facebook?

5 A. Yes. And in some of the documents that I
6 wrote whilst I was at Facebook, addiction was one of
7 the types of harm or the mechanisms by which harm was
8 reproduced that I talked about with senior
9 executives -- Margaret Stewart, [REDACTED], to name two
10 examples -- in those documents themselves.

11 And in particular, the question we talked about
12 was, given that the whole News Feed system is aimed at
13 engagement, that's a set of repeated patterns of
14 behavior -- clicking, liking, sharing, and on so -- the
15 best way to increase engagement is addiction in some
16 way, you know, is to get people doing those forms of
17 engagement.

18 And so the type of content that the News Feed
19 system made viral was the kind of content that would
20 make you feel, make users feel whatever they needed to
21 feel to produce that type of behavior. And so I talked
22 with News Feed executives as well as Margaret and
23 [REDACTED] about that feedback loop, essentially, of a
24 system designed to promote engagement that produced
25 content that kept people on the platform, coming back

1 to the platform, and what to do about that system.

2 Q. Is "feedback loop" an industry term?

3 MR. HALPERIN: Object to foundation.

4 A. We talked a lot about loops in particular,
5 and feedback loops as a kind of loop. Loops is a
6 machine learning term, and the way that machine
7 learning can -- it's almost performative by
8 producing -- by predicting something, it can make that
9 thing come true, especially in a closed system like
10 Facebook.

11 So if you predict a particular form of
12 engagement, the system is likely to display more of
13 that form of engagement over time, and therefore it is
14 so important, what you choose to train and build a
15 system to do, creates the future on that platform.

16 And so for example, [REDACTED], who had worked
17 really deeply in the advertising delivery system before
18 he led Responsible AI -- we talked a lot about how AI
19 really raised the stakes of the impact and choices
20 about the impact in all of Facebook's systems.

21 BY MS. CARROLL:

22 Q. Did [REDACTED] also work for Facebook?

23 MR. HALPERIN: Object to foundation.

24 A. I believe when I started working with him
25 he had had some role at the company. I don't recall

1 what that role was.

2 BY MS. CARROLL:

3 Q. Okay. All right. Let's move on to --
4 let's actually do N now.

5 [Exhibit 4 marked for identification.]

6 BY MS. CARROLL:

7 Q. Before I hand out this document, let me
8 ask you who [REDACTED] is.

9 A. When I worked in the Responsible AI team,
10 [REDACTED] was a colleague of mine who I worked
11 closely with. To my memory, she was either a PM, a
12 project manager, or a technical product manager, a TPM.

13 Q. Okay. And before you look at the
14 document, let me ask you this.

15 Do you recall a presentation that she had set up
16 with [REDACTED] and others talking about
17 industry-wide risks in September of 2021?

18 MR. LEVY: Just give him an opportunity to
19 look at the e-mail first.

20 A. I do. [REDACTED] had previously before this
21 worked I think at Google or in another tech company,
22 and she was keen to bring her learnings from her
23 previous work into her role at Facebook.

24 BY MS. CARROLL:

25 Q. Did you attend this presentation?