

AMENDED Exhibit 39

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR
MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA) Case No. 4:22-md-3047-YGR
ADOLESCENT ADDICTION/)
PERSONAL INJURY PRODUCTS) MDL No. 3047
LIABILITY LITIGATION)
_____)
_____)
This Document Relates To:)
_____)
ALL ACTIONS)
_____)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
UNLIMITED JURISDICTION

COORDINATION PROCEEDING)
SPECIAL TITLE (RULE 3.550)) Judicial Council
) Coordination Proceeding
SOCIAL MEDIA CASES) No. 5255
)

This Document Relates To:)
) Judge: Carolyn B. Kuhl
ALL ACTIONS) Dept. 12
)

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
30(B)(6) VIDEOTAPED DEPOSITION OF [REDACTED]
MAY 8, 2025
(Pages 1 - 209)
9:30 a.m. to 4:00 p.m.

Covington & Burling
850 10th St NW, Washington, DC 20001

Reported By: Amanda Blomstrom, RMR, CRR, and CSR TX #8785/CA #12681/IL #84-3634

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25 Corin Stigall
26 Mandy Wang
27 Savannah Grant
28 Zach Richards

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3 A. That's correct.

4 Q. Okay. And what is Exhibit 2?

5 A. Exhibit 2 is a short bio about my
6 employment history.

7 Q. Okay. So you have -- let's walk through
8 your experience, starting, it looks like, in 2016.
9 Is that the first time you went to work for a Meta
10 entity?

11 A. Yes.

12 Q. Okay. And who exactly did you work -- get
13 hired by in June of '16?

14 A. The specific name of --

15 Q. Yeah.

16 A. -- the person --

17 Q. What company --

18 A. -- that hired me?

19 O. No, what company.

20 A. Oh. Well, I was

21 on the Instagram app, which was owned by Facebook.

22 Q. Okay. And this is a 30(b)(6) deposition.

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1 Do you have an understanding of what that means?

2 A. I do.

3 Q. Okay. And so this is a deposition --

4 Will you get Tab 40 for me.

5 -- that, in which you are representing --
6 you are representing -- you are the representative of
7 Meta today.

8 You understand that, correct?

9 A. I do.

10 Q. Okay. And you understand that you are
11 responsible for answering questions on behalf of,
12 that you are speaking for the Meta entities, correct?

13 A. Yes.

14 Q. And in -- what is your understanding of
15 what the Meta entities are?

16 A. The Meta entities include the -- what we
17 refer to as the family of apps. So that includes
18 Instagram; WhatsApp; Facebook, the app; and a number
19 of other entities.

20 Q. And you understand that you are here to
21 testify on behalf of the Meta -- Meta entities, even
22 if you personally don't have knowledge of the topics

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1 that you're talking about?

2 A. Correct.

3 Q. I'm going to go over the Dep -- the
4 Deposition Notice on the various topics in a minute
5 here, but I want to go back to your LinkedIn profile.

6 A. Sure.

7 Q. So in 20 -- in June of 2016, you were
8 hired as Public Policy manager, Global Politics,
9 Government and Elections, and that was at Instagram,
10 correct?

11 A. Correct.

12 Q. Okay. Explain to me what your job
13 responsibilities were as Public Policy manager.

14 A. Sure. So my job was to help educate
15 individuals in government, government agencies,
16 political figures, political campaigns, on the tools
17 that Instagram offered to help them connect with
18 voters.

19 I also was responsible for coming up with
20 creative campaigns to encourage young people to
21 engage in the civic sphere on Instagram. So that
22 could include things like vote stickers on Instagram

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1 Stories, to promoting ways to ensure you are
2 registered to vote through Instagram.

3 Q. Okay. Were you a lobbyist for Instagram
4 or Meta at that point?

5 A. No.

6 Q. Have you ever served as a lobbyist for any
7 of the Meta entities?

8 A. No. I have not registered as a lobbyist.

9 Q. Who did you report to when you were the
10 public policy manager?

11 A. I reported to an individual named
12 John Tass-Parker.

13 Q. And what was his title?

14 A. He was the head of Global Politics,
15 Government and Elections at Instagram.

16 Q. Is that the title you have now?

17 A. It is not.

18 Q. In describing your responsibilities as
19 Public Policy manager, you talked about encouraging
20 young people to vote. Tell me about that. What was
21 your role specifically in that regard?

22 A. Sure. So we recognized that there was a

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1 clear visual component to how young people were
2 engaging in elections. If you think about the
3 selfies people were taking of their "I Voted"
4 stickers. And so we wanted to capitalize on that and
5 figure out how we can encourage more young people to
6 share the things that they cared about most when it
7 came to civic engagement on Instagram.

8 So I mentioned before, there were some
9 creative stickers where we'd work with artists to put
10 them on to Instagram Stories that young people could
11 leverage after they voted; that was both here in the
12 U.S., but also globally we launched these stickers.

13 And then we also helped partnerships with
14 different elections, organizations, where we would
15 encourage people to register to vote through what's
16 called a QP on Instagram. So when you log on to
17 Instagram, you have it at the top of your News Feed,
18 an entry point where you can register to vote.

19 Q. In that effort, did you engage with any
20 school districts?

21 A. No.

22 Q. Then from 2018 to 2021, you became

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1 Public -- I'm sorry, Policy Programs manager for
2 Youth Safety and Well-Being, correct?

3 A. That's correct.

4 Q. And what were your job responsibilities at
5 that point?

6 A. My job was to build partnerships and
7 programs to help ensure the safety and well-being of
8 young people on Instagram.

9 There are a number of ways that we did
10 that. I would build partnerships with different
11 youth organizations, let's say the Girl Scouts of
12 America, and develop a program on digital literacy
13 that we would then share with young people involved
14 with the Girl Scouts so that they knew the tools that
15 they needed to navigate online spaces safely and
16 confidently.

17 I would also work with external experts
18 in different fields around youth safety and well-
19 being -- so that could be bullying prevention, mental
20 health -- and we would bring their expertise into the
21 product development cycle. What that means is we
22 would connect them with different folks on our

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1 Product Team to make sure we were considering all
2 angles as we developed different products.

3 Q. And other than the Girl Scouts, what other
4 types of entities did you build partnerships with?

5 A. Sure. We developed partnerships with
6 the -- let's see, the National Eating Disorders
7 Association, Trevor Project, the National PTA, a
8 number of groups that -- that reached young people,
9 specific young audiences, but then also the people
10 that we know who are often talking to them about
11 digital safety; so that often included parent
12 organizations.

13 Q. And when you say "parent organizations,"
14 are you talking about school parent organizations or
15 other parent organizations?

16 A. The primary partner that we worked with
17 to -- to reach parents would be the National PTA.

18 Q. And did you ever work directly with any
19 school districts while you served as the Policy
20 Programs manager, Youth Safety and Well-Being, from
21 2018 to 2021?

22 MR. PISTILLI: Just so -- are you asking

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1 her personal capacity?

2 MR. ERICKSON: Yes.

3 MR. PISTILLI: Okay.

4 THE WITNESS: Well, through our program
5 with the National PTA, the National PTA has a
6 network, of course, of schools that they work with,
7 and so, when we would build educational materials
8 around youth safety and well-being and the resources
9 that parents should be aware of as they talked to
10 their teens about navigating Instagram, we would have
11 a select handful of events at schools.

12 BY MR. ERICKSON:

13 Q. Okay. When you had -- hand -- did you
14 personally attend any of these events at schools?

15 A. I did.

16 Q. Would you only attend events in the local
17 area, or would you attend events all over the
18 country?

19 A. I attended events outside of the local
20 area.

21 Q. And how often during those three years
22 were you attending events at school districts or

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1 To get in to schools, oftentimes there is
2 a grant associated with that through the National
3 PTA, and that's just to make sure they can provide
4 pizza to the parents and teachers who come out, and
5 other resources for those events.

6 Q. When did the relationship between Meta and
7 the National PTA start?

8 A. I can't say with specificity because I do
9 think it predates me, but I think that Facebook began
10 a relationship with the National PTA as early as
11 2014, possibly earlier.

12 Q. So in the approximately last 10 or
13 11 years in which Meta has had this relationship with
14 the National PTA, has the National PTA always handled
15 direct contact with the schools or has there been any
16 point where Meta entities directly contacted schools
17 for the purposes of the National PTA relationship?

18 MR. PISTILLI: Object to the form.

19 You can answer.

20 THE WITNESS: Yeah, I -- I can't recall
21 a time that Meta or Instagram or Facebook worked
22 directly with those schools as it relates to the

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1 National PTA. In fact, I think the National PTA
2 is pretty focused on making sure they own those
3 relationships and own communications.

4 BY MR. ERICKSON:

5 Q. So essentially what you're saying is,
6 essentially, the National PTA is preventing Meta
7 entities from contacting the schools directly?

8 MR. PISTILLI: Objection; misstates prior
9 testimony.

10 THE WITNESS: Yeah, I wouldn't say
11 "preventing." That would imply that there was a
12 strong desire for us to connect directly with the
13 schools. I think it's more, that's the process.
14 They have a number of corporate partners that they
15 work with, from GM, you know, to Meta to X to a
16 number of different corporate partners. So that's
17 just their mode of operation.

18 BY MR. ERICKSON:

19 Q. So as I understand your testimony, Meta
20 did not have a strong desire to contact the schools
21 that were being serviced by the National PTA under
22 this relationship; is that correct?

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1 it is something that is -- is potentially harmful for
2 a student.

3 Q. And so how recently was this School
4 Partnership Program launched?

5 A. The School Partnership Program, we've --
6 launched a pilot back in 2024 with a select handful
7 of schools, in partnership with ISTE, the
8 International Society for Technology and Education,
9 and we're looking to have a larger launch of up to a
10 thousand schools over the next few months.

11 Q. Okay. So the School Partnership Program
12 pilot was launched after this lawsuit was filed,
13 correct?

14 A. The School Partnerships Program was
15 launched in 2024. I know teams were having
16 conversations around this concept before that,
17 before 2024.

18 There are challenges with building a flow
19 like this. It's important that we're able to verify
20 that someone is actually an administrator with a
21 school. There is difficulties with doing that. So
22 we wanted to make sure we were getting this right

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1 before we deployed it here in the U.S.

2 Q. Okay. My question was very specific.

3 The School Partnership Program pilot was
4 launched after the lawsuit was filed, correct?

5 MR. PISTILLI: Objection; asked and
6 answered.

7 THE WITNESS: When was the lawsuit
8 specifically filed?

9 BY MR. ERICKSON:

10 Q. Do you know?

11 A. I don't.

12 Q. Okay. The Amended Petition was filed
13 March 27, 2024.

14 A. The pilot then happened after that.

15 Q. And who -- the -- who oversees the School
16 Partnership Program; who is the responsible person
17 for it?

18 A. There are a number of people who are
19 working on the technological side of this initiative,
20 who are working on communicating about it; so there's
21 not one singular individual. There is a -- there is
22 a product team that's working on this. There's --

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1 that could be reported?

2 MR. PISTILLI: Objection; misstates prior
3 testimony.

4 THE WITNESS: I am aware of bullying and
5 harassment being involved. It --

6 BY MR. ERICKSON:

7 Q. And violence?

8 A. And graphic violence.

9 Q. And so what does it mean -- what does
10 "graphic violence" mean?

11 A. It can include anything that might happen
12 at school. So if there is a fight at school and
13 someone takes a video of it and posts it to -- to one
14 of the platforms, that would be something that an
15 administrator could report to us.

16 Q. Okay. So the potential violations that
17 are reported up through the School Partnership Pilot
18 Program at this point include bullying and harassment
19 and graphic violence, correct?

20 A. That's my understanding.

21 Q. Okay. And so, as I understand what you're
22 saying, if there is a fight video or something that

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1 Q. Okay. So --

2 (Brief interruption.)

3 BY MR. ERICKSON:

4 Q. Okay. So as I understand this prioritized
5 review, the School Partnership Program, the
6 administrators can contact you and request that a
7 post, a specific post, be taken down, correct?

8 A. Um-hmm.

9 Q. "Yes"?

10 A. It can be a post. It could be an account
11 as well.

12 Q. Okay. Is there any special process
13 undertaken to take down an account in the School
14 Partnership Program?

15 A. There's no special process. Any report
16 that we're receiving from a school administrator
17 associated with the School Partnership Program is
18 prioritized for review.

19 Q. Okay. Does a school need to have its own
20 Instagram account or Facebook account in order to
21 make one of these complaints?

22 A. I believe so.

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1 A. It's all done in-app, and so a school,
2 when they are brought into the program, is able to
3 access additional resources directly through the app.
4 It may bump them to an external website, but they're
5 all resources that were developed with leading
6 experts and partners.

7 Q. And were those leading experts and
8 partners compensated by Meta?

9 A. I don't know.

10 Q. Who would know?

11 A. I think [REDACTED] would know. I
12 do know we -- we compensated the International
13 Society for Technology and Education for the pilot
14 initiative, because they had to do, as I mentioned,
15 the communications with schools and identifying
16 schools. I don't know, though, about the content,
17 which is what your question was specifically.

18 Q. And so, in terms of reporting these
19 violations, the school administrator has to do that
20 through their Facebook app or their Instagram app,
21 correct?

22 A. Correct.

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1 two."

2 You see that?

3 A. I do.

4 Q. Okay. And so this is what we were talking
5 about a little bit with regard to Scott Bratsman,
6 correct?

7 A. Yes.

8 Q. Okay.

9 A. I think so, yeah.

10 Q. And the Product Team was trying to come up
11 with a way to confirm where -- where teens went to
12 high school as part of this youth growth strategy,
13 correct?

14 A. Yes, they were looking to understand how
15 they could correctly identify a teen's school
16 affiliation. You'll see, on the next few pages, and
17 we discussed this too with other conversations I had,
18 a lot of teens would put Hogwarts, I like some of the
19 other examples included here, so there were a number
20 of challenges for correctly identifying what school a
21 teen went to.

22 Q. Okay. Let's go to the next page, please.

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1 opportunity is.

2 Q. In order for Facebook to grow their youth
3 market, they thought it was important for them to
4 know where these students went to high school,
5 correct?

6 A. It appears to be something that we were
7 exploring. It's important to note, though, that this
8 didn't end up going to market.

9 Q. Even though the students themselves more
10 than half the time didn't want to tell Facebook where
11 they went to high school, Facebook wanted to figure
12 out where they went to high school, correct?

13 A. I don't know if a teen didn't want to or
14 if a teen just didn't include their school. I don't
15 know that saying Hogwarts is because they're
16 intentionally trying to obfuscate their school
17 affiliation with Meta. I think some teens just
18 didn't include that information.

19 Q. Well, when given the opportunity to
20 volunteer where they went to high school, more than
21 50 percent of the students declined to do that,
22 didn't they?

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1 question again? I want to make sure I'm answering
2 it, but I --

3 Q. Does Meta have any information about how
4 students use the Meta social media apps while at
5 school?

6 A. So from conversations that I had with a
7 number of people who looked into this at different
8 times, it looks like they're able to -- to look at
9 different signals to understand when teens are online
10 and jump to whether that is during the school day or
11 not, or if they are physically at school, using some
12 of the technology we talked before where we're
13 understanding the location, if you're at a movie
14 theater or --

15 Q. Okay. So --

16 A. -- a store, so --

17 Q. -- your testimony is that the only
18 information that Meta has about how students use
19 Meta's social media apps while at school is the
20 different signals that they can use to identify
21 where the app is being used, correct?

22 MR. PISTILLI: Objection; misstates prior

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1 testimony.

2 THE WITNESS: Yeah.

3 No, I -- forgive me, I thought you were
4 asking, like, technically how. I mean, often,
5 product teams have conversations with teens to
6 understand their online experience, how they're using
7 the platform. So it's very reasonable that in some
8 of those focus group conversations or in research,
9 students are asked about or offer up information
10 about how they use social media or our apps
11 specifically while at school.

12 BY MR. ERICKSON:

13 Q. In preparing for this deposition, you have
14 not reviewed any such information from focus groups,
15 have you?

16 A. I've not.

17 Q. Meta does not have any surveys that it's
18 conducted to determine how much -- how often students
19 are using the Meta social media apps while in school,
20 have -- have they?

21 MR. PISTILLI: Object to the form.

22 THE WITNESS: Again, my -- my exposure to

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1 adolescent girls using digital technologies.

2 And then I came to Instagram because I
3 felt so strongly about the power of these tools to
4 encourage young people to build community and do
5 amazing things.

6 BY MR. PISTILLI:

7 Q. Do you remember testifying earlier today
8 about partnerships Meta has engaged in with educators
9 and folks in the education space?

10 A. I do.

11 Q. Can you please tell the jury about some of
12 those partnerships with educators.

13 A. Sure. So we have partnered with a number
14 of different organizations, like the National PTA,
15 for a number of years to make sure we are arming
16 parents and teachers and educators and young people
17 with the information they need to navigate social
18 media safely and competently. And we've done this in
19 a number of ways. The National PTA partnership has
20 taken many different forms.

21 Between the years of, I believe, 2018-
22 2019, we had something called Digital Family Nights

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1 where, in partnership with the National PTA, there
2 were events at nearly 200 schools across the country,
3 in every single state, I believe, where we were
4 meeting with parents and teachers and talking to them
5 about the digital foundations of safety as it relates
6 to social media and -- and beyond.

7 Q. What are some other initiatives Meta has
8 undertaken in partnership with the National PTA?

9 MR. ERICKSON: Object to form.

10 You can answer.

11 THE WITNESS: We've also built parents'
12 guides with the National PTA. We -- which we've
13 distributed through a lot of their networks. We've
14 brought them in as we've developed products that are
15 specifically geared towards supporting parents and
16 young people.

17 Yeah, there -- there are events that we
18 have held over the past year, schools in -- a school
19 in Ohio, where we showed up and provided these
20 resources. There is actually someone today, I
21 believe out in Utah, visiting the state PTA Utah
22 event -- convention there and hosting a session

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1 around our tools and resources, and then also hosting
2 a focus group with attendees to make sure we're
3 hearing the latest concerns, pain points, and also
4 things that they love about social media.

5 BY MR. PISTILLI:

6 Q. And at these events does Meta personnel
7 have the opportunity to interact with school
8 personnel?

9 A. We do.

10 Q. And what sort of things, to your
11 understanding, are discussed with educators at
12 these events?

13 A. It depends. We will often do tabling
14 at these events, and so educators or parents or
15 administrators will come up to the booth and either
16 ask some really technical question or raise concerns
17 that they have. They'll attend some of the sessions
18 to learn more, yeah.

19 Q. Okay. Thank you.

20 A. Sure.

21 Q. Switching gears.

22 Has Meta ever done any formal research

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1 REPORTER'S CERTIFICATION

2 DEPOSITION OF [REDACTED]

3 MAY 8, 2025

4 I, Amanda Blomstrom, a Notary Public in and for
5 the District of Columbia, hereby certify to the
6 following:

7 That the witness, [REDACTED], was duly sworn
8 by the officer and that the transcript of the oral
9 deposition is a true record of the testimony given by
the witness;

10 That the deposition transcript was submitted to
11 the witness or to the attorney for the witness for
12 examination and signature;

13 I further certify that I am neither counsel for,
14 related to, nor employed by any of the parties or
15 attorneys in the action in which this proceeding was
16 taken, and further that I am not financially or
17 otherwise interested in the outcome of the action.

18 Certified to by me this 12th day of May, 2025.

19 

20 _____
21 Amanda Blomstrom, CRR, RMR, CLR

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