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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,  
Plaintiff,

v. Case No.  
1:24-cv-10049-LJL

WAYFARER STUDIOS LLC, a  
Delaware Limited Liability  
Company, et al.  
Defendants.

\* \* \* \* \*

\*\*\* CONFIDENTIAL \*\*\*

VIDEOTAPED DEPOSITION OF:  
ARON CULOTTA

Thursday, November 20, 2025  
10:01 a.m. (CST)  
New Orleans, Louisiana

Reported by: YOLANDA J. PENA, CCR, RPR  
No. 2017002 in and for the  
State of Louisiana

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1 perform a causal analysis, but I would say that there  
2 are many indicators here of a connection between this  
3 activity and the defendants.

4 BY MR. KALTGRAD:

5 Q. And what are the indicators that you're  
6 referring to?

7 A. So this would be the -- kind of the -- the  
8 main points in the document, right. So the analysis of  
9 those three platforms, TikTok, Reddit, and YouTube, and  
10 the anomalous behavior that -- that I find therein.

11 Q. Okay. So my understanding from your report is  
12 that you've analyzed certain characteristics of TikTok,  
13 Reddit, and YouTube, and you found that -- your opinion  
14 is that there may be some inauthentic online activity.

15 What expertise do you have to link any of that  
16 to a defendant that a layperson wouldn't have?

17 A. I --

18 MS. BENDER: Objection.

19 A. I would say my role here was -- my expertise  
20 here is primarily on the analysis of the social media  
21 itself. I would say the links to the defendants  
22 primarily are derived from the discovery documents,  
23 which mentioned certain specific platforms, posts, and  
24 articles that feature very prominently as outliers in  
25 my analysis.

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1 BY MR. KALTGRAD:

2 Q. So your opinion regarding the defendant comes  
3 from reviewing discovery documents; is that right?

4 MS. BENDER: Objection.

5 A. Again, my opinion is primarily looking at  
6 indicators of inauthenticity, and the links that are  
7 made to the defendant come from the results of that  
8 analysis paired with the discovery documents, which  
9 identify both the timing and the content that is  
10 consistent with what I find in the analysis.

11 BY MR. KALTGRAD:

12 Q. When you're using the word "inauthentic," are  
13 you including boosting comments that are already on the  
14 internet as opposed to placing comments on the  
15 internet?

16 MS. BENDER: Objection.

17 A. I would consider both of those as types of  
18 inauthentic activity, yes.

19 BY MR. KALTGRAD:

20 Q. Have you identified any instance where  
21 somebody added false content to Reddit, TikTok, or  
22 YouTube?

23 A. My analysis wasn't really focused on the --  
24 the truth or -- or falseness of different statements.

25 Q. You're not intending to offer an opinion on

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1 Q. Okay. And it says -- paragraph 52 says,  
2 [As read]: "To assess whether there is evidence of  
3 manipulation present among this set of videos,  
4 I analyzed patterns in engagement metrics on posts and  
5 comments. Specifically, I calculated the proportion of  
6 the number of likes on the top comment vs. the number  
7 of likes on each video (the 'Top-Comment Share').  
8 Research -- researchers have found that deviations in  
9 engagement ratios such as this can act as reliable  
10 signals of potentially manipulated activity."

11 First of all, what do you mean by  
12 "manipulation"?

13 A. In this case, the manipulation would be an --  
14 an effort to boost certain comments attached to the  
15 specific videos.

16 Q. And you cite a number of academic articles.  
17 Is there any peer-reviewed study that you're aware of  
18 that found in the proportion of likes on a top comment  
19 compared to its parent post on TikTok is indicative of  
20 manipulation?

21 MS. BENDER: Objection.

22 A. I'm not aware of a super specific version of  
23 that. I would say the literature I cite are all  
24 variants of that, looking at different ratios or  
25 comparisons between different types of engagement

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1 measures as an indicator of inauthenticity.

2 BY MR. KALTGRAD:

3 Q. Well, are you aware of any study that says  
4 that the proportion of likes on a top comment on any  
5 social media platform compared to its parent post is  
6 indicative of manipulation?

7 MS. BENDER: Objection.

8 A. Again, I'd have to reconsider to see that  
9 specifically. I would say certainly one of the ones  
10 I cite looks at anomalous behavior on YouTube, and the  
11 number of likes and views and comments are all used to  
12 detect that inauthenticity.

13 BY MR. KALTGRAD:

14 Q. And which one -- which cite is that that  
15 you're referring to?

16 A. This would be the Kirdemir 2023.

17 Q. And what is the (indiscernible) study that  
18 applies here?

19 THE REPORTER: I'm sorry. Can you  
20 repeat the question?

21 BY MR. KALTGRAD:

22 Q. What is the finding of that study that applies  
23 here?

24 A. Again, I'd have to look at it again in more  
25 detail. But based on my recollection, they were

1 looking at how the correlation amongst different types  
2 of engagement metrics can be -- serve as a strong  
3 indicator of inauthenticity.

4 Q. Okay. But there -- there are lots of  
5 different engagement metrics. I'm asking are you aware  
6 of any study that says the ratio of likes on a top  
7 comment to likes on a parent post is indicative of  
8 manipulation?

9 MS. BENDER: Objection.

10 A. I'd have to double-check, but again, I would  
11 say this is -- this is a -- this paper is -- is  
12 following the -- a very similar methodology for  
13 YouTube.

14 BY MR. KALTGRAD:

15 Q. Other than this paper that you cited, can you  
16 cite to any other peer-reviewed article, study, that  
17 would indicate that likes on a top comment in  
18 proportion to likes on a parent post would be  
19 indicative of manipulation?

20 MS. BENDER: Objection.

21 A. Again, I can't recall right now one that is  
22 that specific. I would say the earlier cite to Yang is  
23 a similar type of comparison on the Twitter platform.

24 BY MR. KALTGRAD:

25 Q. Well, you didn't analyze Twitter in this case,

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1 right?

2 A. No, sir.

3 Q. Paragraph 53, you say, "I reviewed the  
4 Top-Comment for each post in the dataset and coded  
5 whether it expressed positive or negative sentiment  
6 toward Ms. Lively, positive or negative sentiment  
7 toward Mr. Baldoni, or neither."

8 How did you decide whether a comment was  
9 positive or negative towards Mr. Baldoni or Ms. Lively?

10 A. So as this says, I analyzed it based on the  
11 content itself and the context, and then we also had a  
12 second annotator label these separately to get measures  
13 of kind of agreement.

14 Q. Okay. So you read the comments, and then you  
15 made a judgment call. This is pro-Lively or  
16 anti-Lively. Is that basically what you did?

17 A. More or less. And yes, these are all  
18 available in our -- in our backup data as well.

19 Q. Do you have any specific expertise in  
20 analyzing whether comments are pro or anti in any way?

21 MS. BENDER: Objection.

22 A. Well, I mean, so I've been doing research in  
23 social media since around 2009, and so I've spent a lot  
24 of time staring at posts and comments and trying to  
25 contextualize them and understand them, including for

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1 sentiment analysis. So I would say I've -- I've done  
2 quite a bit of this type of work before.

3 BY MR. KALTGRAD:

4 Q. I see. Is there some kind of protocol that  
5 you used to decide what's pro-Lively or anti-Lively or  
6 pro-Baldoni or anti-Baldoni, or is this sort of your  
7 gut feeling?

8 MS. BENDER: Objection.

9 A. I wouldn't characterize it as a gut feeling.  
10 I would say, you know, you typically have a -- kind of  
11 the point of the -- the secondary review is to kind of  
12 measure that agreement to determine whether there's  
13 ambiguity in these things, but again, I would refer to  
14 the backup documents we produced for any concerns  
15 around that labeling process.

16 BY MR. KALTGRAD:

17 Q. But was there -- I'm going -- I'm going to go  
18 back to my question.

19 Was there some kind of protocol you used? Did  
20 you say if it's got this term, it's going to be  
21 pro-Lively; if it's got this term, it's going to be  
22 anti-Lively?

23 A. It wasn't certainly term-based like that. It  
24 was based on the entire context of the post.

25 Q. Okay. So you read the comment, you made a

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1 coder was, right?

2 MS. BENDER: Objection.

3 A. Again, not as I sit here today.

4 BY MR. KALTGRAD:

5 Q. Okay. And you're not sure exactly what  
6 instructions they were given, correct?

7 MS. BENDER: Objection.

8 A. I would say I had a high-level understanding  
9 of what the -- the instructions were, but I did not  
10 specifically sit down and -- and write those  
11 instructions out myself.

12 BY MR. KALTGRAD:

13 Q. Are you -- are you aware of any peer-reviewed  
14 study that says having a second reviewer do a sentiment  
15 analysis determines credibility for the first reviewer?

16 A. Yes, I would say it's quite common to do this  
17 sort of reliability test to -- to validate the  
18 annotation.

19 Q. Do you cite any examples of studies that you  
20 know of as you sit here?

21 A. Off the top of my head?

22 Q. Yeah.

23 A. Excuse me. So I can't recall, like, exact  
24 full citations right now. Again, my own work has done  
25 this in the past, and it's very common in this field.

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1 I would say anytime a -- it's very common when a  
2 researcher produces a new dataset, for example, to --  
3 to provide these inter-annotator reliability measures  
4 because that adds validity to people who then use that  
5 dataset in the future.

6 Q. How did you determine what the 300 sample  
7 volume set was going to be?

8 A. That was a random sample. It's a uniform  
9 random sample.

10 Q. And who did the random sample? Was that you,  
11 or did Voluble do that?

12 A. I can't recall all the specifics right now,  
13 but if I had to estimate, I would say probably Voluble  
14 generated that sample.

15 Q. Do you know how it was done?

16 A. So again, I didn't -- I don't recall the  
17 specifics, but typically, one would use a random number  
18 generator to shuffle the instances in order to pull the  
19 300 to be labeled.

20 Q. Okay. That's typical, but you're not sure if  
21 that's what was done here, correct?

22 MS. BENDER: Objection.

23 A. My recollection is that that's what was  
24 reported to me as being done.

25 BY MR. KALTGRAD:

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1 Q. Let's say 50 percent.

2 A. 50 percent. Again, it depends, but I would  
3 say in the literature and for -- for annotations of  
4 this type, 50 percent would often be called something  
5 like moderate agreement.

6 Q. Look at paragraph 54 of your report. The  
7 first sentence ends, it says -- well, I'll read the  
8 first sentence. "My analysis indicates that  
9 Top-Comments for videos in August that were aligned  
10 with the 'key messaging points' of the campaign (i.e.,  
11 they elevate negative content about Ms. Lively or  
12 positive content about Mr. Baldoni) consistently  
13 generated a higher Top-Comment Share than expected."

14 Do you see that?

15 A. Yes, sir.

16 Q. Expected by who? What -- what are you  
17 referring to in there?

18 A. So this would be a -- more of a statistical  
19 argument about the average or -- the average type --  
20 excuse me, the average top-comment share that one sees  
21 in this specific dataset.

22 Q. So when you say higher than expected, does  
23 that just mean higher than average?

24 A. Not simply higher than average, but we perform  
25 statistical tests to determine whether that is a

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1 statistically significant deviation.

2 Q. Okay. So when you say higher than expected,  
3 are you saying significantly -- significant deviation?

4 A. Yes. We are -- we are indicating significant  
5 deviation from the mean for these.

6 Q. Okay. Significant deviation from the average  
7 of the top-comment share, correct?

8 A. Correct.

9 Q. That's what you're referring to?

10 A. Yes, sir.

11 Q. In your analysis of the comments, did you  
12 consider that at the time period you're looking at  
13 Blake Lively was promoting an alcohol brand at the same  
14 time as the premiere of a movie about domestic  
15 violence? Did that play into your analysis at all?

16 MS. BENDER: Objection.

17 A. I wouldn't say I treated that differently from  
18 other events in the data.

19 BY MR. KALTGRAD:

20 Q. Did you consider it at all?

21 MS. BENDER: Objection.

22 A. Only to the extent that it appeared in the  
23 data I was examining.

24 BY MR. KALTGRAD:

25 Q. And how did you address it? How did that

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1 MR. KALTGRAD: Dr. Culotta, I'm now  
2 looking at --

3 THE VIDEOGRAPHER: We are going back on  
4 the record.

5 MR. KALTGRAD: Oh, I'm sorry.

6 THE VIDEOGRAPHER: The time is 11:21.  
7 You're all good.

8 BY MR. KALTGRAD:

9 Q. Dr. Culotta, I'm now looking at paragraph 54  
10 of your report. If you could, turn there. And towards  
11 the bottom of paragraph 54, it says, "Both the  
12 anti-Lively and pro-Baldoni average comment shares are  
13 a statistically significant deviation from the mean,  
14 suggesting there was a concerted effort to seed and/or  
15 elevate these comments."

16 On what basis do you draw the conclusion that  
17 a deviation from the mean means a concerted effort to  
18 seed and/or elevate the comments?

19 A. So I guess there would be two -- two primary  
20 issues here. One, the -- such a large deviation from  
21 the mean is an indicator of anomalous behavior, right,  
22 something that is not typical of a TikTok user.

23 But the second reason has to do with this top  
24 comment idea in the first place via the interface,  
25 right. So on TikTok, of course, it's very video-based,

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1 and typically, one is scrolling through videos. So the  
2 user effort required to first open up the comment  
3 section, scroll to a comment, and upvote it is just,  
4 from a user perspective, a very kind of unusual thing  
5 to do at that level of frequency.

6 So both the anomalous statistics that I talk  
7 about as well as kind of the anomalous engagement with  
8 the platform itself, both serve as indicators that this  
9 was done through a concerted effort.

10 Q. How much of a standard deviation would have to  
11 occur to reach the conclusion that there was concerted  
12 effort?

13 A. Again, there's no strict threshold here. I  
14 did a statistical test to determine the significance  
15 level of that deviation, and that's in footnote 145.  
16 And all of those are your confident very small p  
17 values, which serves to indicate that they were extreme  
18 outliers.

19 Q. And when you say "deviation from the mean,"  
20 you're referring to the mean top comment share for  
21 August for the four different categories that you've  
22 listed there, right?

23 A. It's the mean over all -- over all top  
24 comments in August.

25 Q. And that's reflected in Figure 1?

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1 A. Yes, sir. That's the 9.2 percent in Figure 1.

2 Q. How did you calculate the top comment share  
3 mean?

4 A. So for every top comment in August, each one  
5 has a top-comment share value, and I simply averaged  
6 those over all of the top comments collected for  
7 August.

8 Q. Is it your opinion that unless there is a --  
9 strike that.

10 Are you offering the opinion that if there is  
11 a standard deviation from the mean for either  
12 anti-Lively, pro-Baldoni, pro-Lively, or  
13 unsure/unrelated categories, that would equate to a  
14 concerted effort to seed or elevate the comments?

15 MS. BENDER: Objection.

16 A. I'm not offering that one standard deviation  
17 is -- is a threshold, necessarily.

18 THE REPORTER: I'm sorry. Can you  
19 repeat that?

20 A. I'm not offering that one standard deviation  
21 is a threshold. What I am saying is that this  
22 significant deviation from the mean combined with the  
23 modality of the app itself contextually serve as -- as  
24 strong evidence of a concerted effort here.

25 BY MR. KALTGRAD:

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1 similar language, that's evidence of manipulation?

2 A. I'm saying that the strikingly similar  
3 language, combined with the anomalous-like values  
4 together, are indicators of potential coordinated  
5 behavior, yes.

6 Q. Is the description of "strikingly similar  
7 language" based on any methodology?

8 A. This particular analysis is -- is -- is just  
9 based on a qualitative analysis of these particular  
10 comments.

11 Q. So just your view that these are -- look like  
12 strikingly similar language?

13 MS. BENDER: Objection.

14 A. In this particular example here, it's looking  
15 at, for example, the word "me" and the -- the types of  
16 comments that are being made around that. I think they  
17 do look strikingly similar.

18 BY MR. KALTGRAD:

19 Q. Okay. So when you said the word "me," to you,  
20 combined with the number of likes, suggests online  
21 manipulation?

22 MS. BENDER: Objection.

23 A. Again, I mean, it's not just the single word  
24 "me," of course. But it's the context of just being  
25 used in these comments serves as an additional marker

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1 Q. Are TikTok users able to dislike comments?

2 A. I'm trying to remember as I sit here. I know  
3 there was some back-and-forth on that. I'd have to  
4 double-check. But my -- my current recollection is no,  
5 but that is something that's changed on the platform.

6 Q. Okay. If they were able to dislike comments,  
7 would that analysis of dislike of comments been useful  
8 to your report?

9 MS. BENDER: Objection.

10 A. I'm not going to speculate on that right now.

11 BY MR. KALTGRAD:

12 Q. But you didn't analyze any dislike of  
13 comments, correct?

14 A. My focus was not on the dislike behavior on  
15 TikTok, correct.

16 Q. You say your focus, but you didn't analyze it  
17 at all, right?

18 A. Only to the extent it would have influenced  
19 the data directly, but I did not perform an analysis of  
20 dislikes on TikTok, no.

21 Q. You also talk about inauthentic activity on  
22 Reddit, and you refer to a comment score. What is a  
23 comment score?

24 A. So a comment score is provided by the platform  
25 that is roughly the difference between the number of

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1 upvotes that comments received minus the number of  
2 downvotes that comments received.

3 Q. And how is it calculated exactly? Do you  
4 know?

5 A. So the exact algorithm is not publicly  
6 published by Reddit. Part of the reason is they're  
7 trying to prevent manipulation of that metric. But  
8 what we do know is -- is, as I said, it's roughly that  
9 difference between upvotes and downvotes.

10 Q. And you were offering the opinion that because  
11 there was a high comment score on a specific Reddit  
12 thread in August 14th, 2024, that's evidence of some  
13 kind of manipulation; is that right?

14 MS. BENDER: Objection.

15 A. I would say the Reddit analysis is broader  
16 than that specific thing, but yes, I would say the  
17 extreme outlier activity we see on August 14th is a  
18 strong indicator of potential inauthentic activity.

19 BY MR. KALTGRAD:

20 Q. Are you aware of any peer-reviewed study  
21 showing that a comment score on Reddit is indicative of  
22 social media manipulation?

23 A. Again, I think some of the literature we  
24 discussed earlier that focuses on anomalous engagement  
25 metrics would -- would support this type of analysis.

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1 BY MR. KALTGRAD:

2 Q. Okay. The third one isn't even close, right?

3 A. I guess I would say that 6500 is slightly more  
4 than half of 12,000 and that 12,000 is less than half  
5 of 27,000.

6 Q. I'm going to your report now. Paragraph 81,  
7 you say, "The activity that I analyzed and observed  
8 collectively demonstrates evidence of artificial or  
9 manipulating activity."

10 And from what I can tell, the next several  
11 pages describes comments that you coded as anti-Lively  
12 or pro-Bal- -- pro-Baldoni that got lots of upvotes and  
13 comments that you coded as pro-Lively that got lots of  
14 downvotes.

15 Is that a fair summary?

16 MS. BENDER: Objection.

17 A. That's certainly part of -- of what I did  
18 there, yeah.

19 BY MR. KALTGRAD:

20 Q. Okay. So these upvotes and downvotes, how  
21 does that lead to evidence of artificial or  
22 manipulating activity?

23 A. Sure. So I think particularly, if I look at,  
24 for example, Figure 12, which is looking at every  
25 comment in this four-month period -- and as a reminder,

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1 this is over 450,000 comments from all of Fauxmoi, not  
2 just those related to Ms. Lively or related folks.

3 So what I'm showing here is the distribution  
4 of comment scores for all comments in this four-month  
5 period, so it's a very large dataset. And these red  
6 triangles are indicating comments that are related to  
7 either Ms. Lively or Mr. Baldoni.

8 And what this graph is showing is that if you  
9 look at these extreme -- these very extreme comments,  
10 including the highest-scoring one, which is that red  
11 triangle at the very top left, as well as the red  
12 triangles all the way at the other side of the graph,  
13 what this is showing is that not only are these  
14 comments extreme outliers in terms of this Reddit  
15 score, but also that the sentiment attached to these  
16 are also aligned with the goals of the alleged  
17 campaign.

18 In other words, everything -- I'm sorry.  
19 Everything with the high positive score, the vast  
20 majority of those are either anti-Lively or  
21 pro-Baldoni, whereas on the other side of the graph,  
22 the vast majority are either pro-Lively or  
23 anti-Baldoni.

24 Q. So you've got scores that are high that you've  
25 coded as anti-Lively. How do you make the leap to

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1 coordinated activity from that?

2 A. So it's a little bit like these -- the same  
3 rationale in the TikTok analysis, right. So I have --  
4 again, I want to emphasize -- extreme outliers here in  
5 these red scores that would be very difficult to obtain  
6 without any coordination combined with the sentiment  
7 consistency around what is -- has a high versus low  
8 score.

9 Q. Why do you say it would be very difficult to  
10 obtain without coordination? What's that based on?

11 A. Several things. I mean, in part having worked  
12 for a long time with this type of data, but also, the  
13 fact that when we look at the actual comments and posts  
14 themselves, I do see, of course, a distribution of  
15 sentiment, pro-/anti-Lively, that one would expect.

16 So the fact that -- the comments themselves  
17 seem to have that heterogeneity, yet the concentration  
18 on the extreme tails of this graph are instead very  
19 homogenous in their sentiment direction.

20 Q. Did you analyze the timing of upvotes or  
21 downvotes in any way?

22 A. I didn't look at the time of specific upvotes,  
23 but I do have the time stamp of when that  
24 upvote/downvote or Reddit score was captured.

25 Q. You next look at the "little bump" YouTube

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1 indicators that there was manipulation attempts for  
2 this.

3 Q. Okay. But have you -- does your analysis tie  
4 back to a defendant in any way?

5 MS. BENDER: Objection.

6 BY MR. KALTGRAD:

7 Q. Are you offering an opinion that defendants  
8 were behind boosting of this content?

9 MS. BENDER: Objection.

10 A. Again, my goal is not to perform a causal  
11 analysis here. It was primarily to look at indicators  
12 of inauthenticity. And in this case, the timing and  
13 the content and the type of video this was is  
14 consistent with that link, but I did not perform a  
15 causal analysis for that specific question.

16 BY MR. KALTGRAD:

17 Q. So what analysis did you perform in terms of  
18 the YouTube video?

19 THE REPORTER: I'm sorry?

20 BY MR. KALTGRAD:

21 Q. What analysis did you perform for the YouTube  
22 video?

23 A. Sure. So my analysis here was twofold: one,  
24 to look at the timing of comments that were made on the  
25 YouTube video related to this -- to this link; and

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1 secondly, to look at the presence of particular terms,  
2 such as the term "bully," that appeared in those  
3 comments.

4 Q. What expertise do you have that a layperson  
5 would not have to look at comments and the timing?

6 A. Well, for sure, there's a lot that goes into  
7 collecting, cleaning, and analyzing the data in order  
8 to answer those types of questions, as well as the text  
9 analysis to pull out particular words of interest in  
10 the -- in the data.

11 Q. And what particular words did you pull out?

12 A. So in this case, we were looking at the word  
13 "bully" and a couple variants of it.

14 Q. Are you aware of any peer-reviewed study that  
15 says that pulling out terms and comments, looking at  
16 the timing is indicative of online manipulation?

17 MS. BENDER: Objection.

18 A. So yes, I would say -- I would say that the  
19 literature we cite in this report, some of which we've  
20 discussed, looks at anomalous engagement and language  
21 behaviors as signals of inauthenticity. I would say  
22 that this analysis falls into that camp.

23 BY MR. KALTGRAD:

24 Q. Okay. So you've seen -- what did your  
25 analysis -- you know, what did your analysis reveal

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1 about the term "bully"?

2 A. My analysis shows -- and this would be on --  
3 let me get the figure here. This will be Figure 17,  
4 which is looking at the -- the fraction of comments on  
5 this video on YouTube that contain the word "bully" for  
6 each hour of this time range of interest, and what it's  
7 showing is that -- several things.

8 First of all, prior to this video being linked  
9 on Reddit and prior to it -- prior to the timing of  
10 the -- the TAG suggestion that we just discussed,  
11 number one, there was almost no engagement on this  
12 video in terms of the number of comments for over four  
13 days. And number two, the volume of comments using the  
14 word "bully" increased sharply after that suggestion to  
15 send the -- the video to Mr. Wallace.

16 Q. Are you offering the opinion that any  
17 defendant added content -- added a comment with the  
18 word "bully"?

19 A. Again, I'm not analyzing any one specific  
20 comment. I'm saying this pattern that I'm observing in  
21 this figure is consistent with a connection between the  
22 work of -- of the defendants and the observed language  
23 I see here.

24 Q. Well, you say -- you pulled out a lot of  
25 comments with the word "bully." My question is, are

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REPORTER'S PAGE

I, YOLANDA J. PENA, Certified Court Reporter in and for the State of Louisiana, (CCR #2017002), Registered Professional Reporter (RPR #970346), the officer, as defined in Rule 28 of the Federal Rules of Civil Procedure and/or Article 1434(B) of the Louisiana Code of Civil Procedure, do hereby state on the record:

That due to the interaction in the spontaneous discourse of the proceeding, double dashes (--) have been used to indicate pauses, changes in thought, and/or talkovers; that same is the proper method for a transcription of proceedings, and that the double dashes (--) do not indicate that words or phrases have been left out of this transcript;

That any spelling of words and/or names which could not be verified through reference material have been denoted with the parenthetical "(phonetic)";

That the parenthetical "(sic)" is used to denote when a witness stated a word or phrase that appears odd or erroneous to show that it was quoted exactly as it stands.

YOLANDA PENA, CCR, RPR