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EXHIBIT C

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FIRST JUDICIAL DISTRICT COURT
STATE OF NEW MEXICO
COUNTY OF SANTA FE

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)
STATE OF NEW MEXICO, EX)
REL., RAUL TORREZ,) Case No.
ATTORNEY GENERAL,) 101-CV-2023-02838
)
Plaintiff,)
)
v.)
)
META PLATFORMS, INC.;)
INSTAGRAM, LLC; META)
PAYMENTS, INC.; and)
META PLATFORMS)
TECHNOLOGIES, LLC,)
)
Defendants.)
)
-----X

REMOTE VIDEOTAPED DEPOSITION OF
MARY CATHERINE WIRTH
OCTOBER 21, 2025
9:13 A.M. PACIFIC DAYLIGHT TIME

Job No.: 7652823
Pages: 1 - 203
Reported by: Leslie A. Todd, CSR No. 5129 and RPR

1 the studies flawed are because the -- some of
2 the accounts were registered with adult ages
3 and used exclusively by adults.

4 Do you see that?

5 A. Yes.

6 Q. Okay. Are you aware whether
7 children lie about their age when signing up
8 for social media platforms?

9 A. Of course, they do.

10 Q. Have you seen evidence of that in
11 your own work?

12 A. Everybody that's ever worked at
13 any internet company ever sees evidence of
14 that.

15 Q. Have you seen evidence of that in
16 Meta's documents?

17 A. Yes, I've seen Meta acknowledge
18 it in their documents, when I've been reading
19 the materials that lay out their program for
20 proactively searching out people who lie on
21 their platform.

22 Q. Okay. Let's move on to page 26.
23 The next page, you talk about automated
24 classifiers in the first full paragraph.

25 A. Yes.