

Filed Under Seal

EXHIBIT A

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STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT COURT
- - - - -
STATE OF NEW MEXICO, EX REL., :
RAUL TORREZ, ATTORNEY GENERAL, :
:
Plaintiff, :
:
vs. :Case No.
:D-101-CV-2023-02838
:
META PLATFORMS, INC.; INSTAGRAM, :
LLC; META PAYMENTS, INC., and :
META PLATFORMS TECHNOLOGIES, LLC, :
:
Defendants. :
- - - - -

The VIDEOTAPED DEPOSITION of DANA WEINER,
Ph.D., taken pursuant to the provision of the Code of
Civil Procedure and the Rules of the Supreme Court of
the State of Illinois pertaining to the taking of
depositions for the purpose of discovery, taken
before BARBARA A. PERKOVICH, CSR Number 084-004070,
Certified Shorthand Reporter within and for the State
of Illinois, at the offices of Orrick, Harrington &
Sutcliff, LLP, 353 North Clark Street, Suite 3600,
Chicago, Illinois, on October 27, 2025, at 9:00 a.m.

1 like, the time spent on those conditions, but
2 rather to the proportion of the population that is
3 11 to 17 year olds, which would be a conservative
4 way to discount the time of a healthcare
5 professional.

6 But in -- so back to my explanation.
7 We discounted things by the proportion of the
8 population represented by the age group of this
9 target population, 11 to 17. And then for people
10 who were generalists, meaning they do things other
11 than behavioral health, we discounted it again for
12 the proportion of their time spent on behavioral
13 health things.

14 Psychiatrists, presumably, all they do
15 is behavioral health, so we didn't do that second
16 adjustment. We only did it for pediatricians and
17 for nurse practitioners, maybe, or one other type
18 of professional where they do other things besides
19 behavioral healthcare.

20 Q. Okay. I understand your answer.
21 That's helpful.

22 You agree with me that the conditions
23 that are listed in Table 1 are not an exhaustive
24 list of behavioral health and mental health

1 conditions that affect youth ages 11 to 17?

2 A. That is correct. Yes. We -- let me
3 think. Let me think about this.

4 That is correct. These are the
5 conditions for which there is conceivable
6 research-based relationship between social media
7 use and these conditions. We did not include
8 conditions like the one you asked me to come up
9 with as an example a few minutes ago.

10 Q. Right. Okay.

11 So, for example, you said age 17 is not
12 common, but presumably, psychiatrists treating
13 youth would treat schizophrenia?

14 A. That's correct.

15 Q. And that's not among the conditions
16 that you've listed in your Table 1, correct?

17 A. That's correct.

18 Q. And you haven't tried to discount the
19 time -- the full-time equivalents by the
20 proportion of time spent on treating conditions
21 that are not in this?

22 A. That's correct. So we did not
23 disaggregate time spent on individual conditions,
24 which would have been a much more -- so there --

1 personality disorders on Axis 2. You have these
2 five axes.

3 Adjustment disorders are kind of a
4 mixed bag of things that relate to a person's
5 comprised ability to cope with something. So it
6 could be a death or a breakup or it could be being
7 bullied or it could be -- you know, it could be
8 any number of things that cause people distress.

9 Q. Okay. Did any expert, to your
10 knowledge, offer an opinion about the extent to
11 which adjustment disorders are related to use of
12 social media?

13 A. So not using that language, but I
14 would -- I believe that there is probably
15 substantial overlap in the trauma and adjustment
16 disorders buckets, because not everyone who
17 experiences trauma has it rise to the level of
18 like a disorder like PTSD or a complex childhood
19 trauma disorder.

20 And yet, so -- so I would imagine that
21 some of that trauma, if it needs a diagnosis or it
22 needs to be coded in a category, it would get
23 coded that way.

24 So no is the answer to your question,

1 nobody specifically opined on social media and
2 adjustment disorders but maybe because that's an
3 overly broad category.

4 Q. Okay. And then it says 8 percent of
5 visits were for anxiety-related disorders; is that
6 right?

7 A. Yes.

8 Q. And 7 percent of all visits were for
9 depression, correct?

10 A. Yes.

11 Q. You have no opinion about what
12 percent -- what proportion of the 8 percent of
13 anxiety-related disorder visits related to social
14 media, correct?

15 A. I -- I do not have an opinion. I did
16 just want to note that there is a glossary on Page
17 15 where there is an actual official definition
18 for adjustment disorders, an unhealthy or
19 excessive emotional or behavioral reaction to an
20 event in a person's life. So I just wanted you to
21 know that there's a definition.

22 Q. Okay. Thanks.

23 And your answer stands, there is no
24 opinion by any expert in this case that -- linking

1 Q. Okay. And do you see there is a little
2 box on the bottom and it says "success story." Do
3 you see that?

4 A. Yep.

5 Q. Did you read that?

6 A. I did.

7 Q. Would you say that that person, that
8 student's symptoms were due to social media use?

9 A. It looks like a vitamin D deficiency.

10 Q. Oh. And so sometimes you can isolate
11 causes and they are different from social media
12 use, correct?

13 A. Yes.

14 Q. If we can next mark --

15 (Weiner Deposition Exhibit No. 7 was
16 marked for identification.)

17 BY MR. PANNER:

18 Q. Okay. The reporter has handed you what
19 has been marked as Exhibit 7, which is A Blueprint
20 for Transformation, A Vision for Improved
21 Behavioral Healthcare for Illinois Children, dated
22 February 2023, correct?

23 A. Yes.

24 Q. And you are listed as the principal

1 author or primary author, I should say?

2 A. Yes.

3 Q. So if you turn to the executive summary
4 on Page 2. The second sentence of that first
5 paragraph, it says, "The transformation initiative
6 builds upon the substantial progress made by
7 Illinois agencies to ensure that every young
8 person experiencing mental or behavioral health
9 problems can access needed services."

10 A. Yes.

11 Q. And so the -- your task in the
12 information blueprint was to propose steps that
13 the State could take to ensure that young persons
14 needing mental or behavioral health services could
15 access those services, correct?

16 A. Yes.

17 Q. Is it correct that what you did in the
18 abatement plan is analogous to what you did in the
19 blueprint for transformation?

20 A. So it follows the same approach that I
21 would use in any exercise where I was trying to
22 develop data driven policy and planning, with an
23 implementation science-informed approach to
24 implementing. Those are the hallmarks of, I