

EXHIBIT S

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

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

VIDEOTAPED DEPOSITION OF ZAMAAN QURESHI

FRIDAY, OCTOBER 10, 2025

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

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Videotaped deposition of ZAMAAN QURESHI,
held at the offices of Wexler Boley & Elgersma LLP,
311 South Wacker Drive, Suite 5450, commencing at 9:02
a.m., on the above date, before Juliana F. Zajicek,
Registered Professional Reporter, Certified Shorthand
Reporter, Certified Realtime Reporter.

Job No. 7634822

1 And -- and a moment ago you also mentioned
2 that there was the business practices and design
3 features. What practices and design features were you
4 referring to?

5 MS. WEAVER: Objection; form.

6 BY THE WITNESS:

7 A. I'd just add addiction to my previous
8 answer as well.

9 BY MR. AUSTIN:

10 Q. Oh, great.

11 A. And then to your question, the specific
12 design features that we would say have exacerbated a
13 lot of these mental health concerns include design
14 features that increase time spent on the platform;
15 whether that's push notifications or endless scroll,
16 you know, recommended content and feed that users
17 haven't asked for; design features like geo location,
18 for example, you know, Instagram has rolled out a -- a
19 friend map, similar to Snapchat's friend map; design
20 features like -- that quantify self-worth, so views or
21 likes, like counts, you know, when research suggests
22 otherwise.

23 So those are the kinds of design features
24 that we would say exacerbate a lot of these

1 challenges.

2 Q. Thank you.

3 And in this post, you also refer to
4 this -- the Teen Accounts as being a PR play. Why do
5 you describe Teen Accounts as a -- as a PR play?

6 MS. WEAVER: Objection; form, foundation.

7 BY THE WITNESS:

8 A. So to the best of my knowledge, Meta was a
9 company that was founded in the early 2000s, Instagram
10 was a product that they acquired in the early 2010s,
11 and so this is a product that has been around for
12 years. At this point it's over a decade.

13 And the kinds of changes that they were
14 rolling out were taking place just last year, in
15 September of 2024. So every year prior to that, none
16 of these protections existed for young people. And in
17 many ways it felt like that the creation of and the
18 roll-out of Teen Accounts was not only tied to
19 specific legislative outcome that Meta was concerned
20 about but that they had had years to implement the
21 kinds of changes that they chose to implement or
22 supposedly have implemented with Teen Accounts, but
23 waited to do so at a specific moment in time that was
24 convenient to them.