

AMENDED Exhibit 1131

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

Trust & Safety Operations Headcount Request - Q4 2022

As a follow up to the discussion with Evan and Exec at the Policy SSP, this is a time-sensitive headcount request to supplement both RFT and vendor HC for the Trust & Safety Operations (T&S) team.

TABLE OF REQUESTED HC LISTED IN PRIORITY ORDER (see narrative below for additional details)

Priority	Role	Estimated Cost (2023)	Brief Description
P0	Proactive Ops Manager (RFT)	\$0.25M	Handle day-to-day proactive detection work to free some of [REDACTED] bandwidth to lean into policy work, including efforts to fight grooming and financial sextortion
P0	T&S Vendor Operations Lead (RFT)	\$0.22M	Provide better support for T&S vendor ops given complex, dynamic nature of work and simultaneous launches of new workflows
P0	+8 L3 NCMEC Escalations vendor agents (CW)	\$0.34M	Unblock rollout of CSAM Solicitation rule
P0	Sydney Specialist (RFT)	\$0.22M	APAC HC to start closing the gap in T&S RFT global coverage (currently 7x20)
	SUBTOTAL +3 P0 RFTs and +8 P0 CWs	\$1.03M	
P1	Sydney Lead + 2 Specialists (RFT)	\$0.66M	Additional APAC HC to support 24/7 follow the sun model
P1	T&S Investigations Senior Specialist (RFT)	\$0.24M	Increase ability to analyze 3rd party intel and conduct bad actor network disruption investigations
P1	2 Specialists (US/UK) (RFT)	\$0.45M	Additional variable RFT support for high-judgment, high-priority workflows
	SUBTOTAL +6 P1 RFTs	\$1.35M	
	TOTAL +9 RFTs and +8 CWs	\$2.38M	

CONTEXT

In the recent Safety/PICO 2023 SSP, we did not request new RFTs, in accordance with Snap guidance. However, due to backfill closures and Compass, the T&S RFT team is currently 73% of the size (33.5/46) we anticipated as of Q1'22. Likewise, because we had excess vendor

capacity in H1'22, we made conservative estimates for vendor capacity in our SSP planning, trying to be as disciplined as possible.

However, volumes from new workflows like appeals and chat text reporting, and especially from proactive detection work for tier 1 harms like hard drug sales and CSAM, are typically unpredictable due to the limited data at our disposal to inform volume forecasts prior to launch. We do our best to forecast based on available data, and are doing everything within our control, but we cannot predict volumes in Private stories due to lack of prevalence testing for privacy reasons. Our team is no longer staffed to meet the challenge of this unpredictability.

In the case of Rapid Rules, we do not know how impactful a rule will be until we create and test it. In our October launch of the CSAM Solicitation rule, we forecasted 500 tasks a day, but were able to create this rule which captures ~3k daily violations with 99% accuracy. This is a huge win, but we have not rolled out the rule beyond 10% as we evaluated the incremental HC requirements.

In light of the recent additional pressure and scrutiny by the Drug Enforcement Administration (DEA), as well as mounting regulatory pressure and a challenging regulatory environment overall across Snap's key markets, it has become increasingly important to run a stable operation and to react quickly in response to emerging high risk safety issues.

Based on these recent learnings, we now believe that our current team size (33.5 RFTs and 445 vendor HC) is not sufficient to respond with the agility necessary to fight unforeseen safety issues and absorb unanticipated work resulting from the changing regulatory landscape. The leanness of our team puts at risk our highest priority commitments like more Rapid Rules launches, appeals, chat reporting, account reporting, a more complex transparency report and audit.

In order to fully support the needs of the business, we propose the following HC additions:

+9 RFTs:

+2 T&S Proactive Operations: [REDACTED] leads this team and has two critical areas of responsibility: 1) XFN work with the Policy team, including representing Snap externally in important meetings with regulators and responding to a high volume of regulatory and media inquiries; and 2) managing the proactive detection work with Product and Eng partners. [REDACTED] is uniquely suited to have a large impact in the policy area. To free up some bandwidth and enable her to lean in more to the policy work, including engagement with regulators and parents on our efforts to combat financial sextortion and grooming, we request a Proactive Operations manager under [REDACTED] to manage this team and handle the day to day details of the proactive detection work. We also request an Investigations Senior Specialist to increase our ability to analyze third party intel and conduct bad actor network disruption investigations, as this work is currently limited by team bandwidth constraints.

+1 Vendor Operations Lead: T&S currently has one Vendor Operations Lead to manage a vendor workforce of 445 agents across 3 different vendors in Europe, India, and Costa Rica. We

request a second Vendor Ops lead to better support this global scaled workforce and properly manage our current operations and launch of complex new workflows such as appeals, account reporting, chat reporting, and new Rapid Rules. Although the current ratio of vendor management may be appropriate for many operational functions, we need additional support given the complexity and dynamic nature of T&S work, which often leads to multiple simultaneous launches of new or substantially revised workflows and training and calibration sessions with vendor teams.

+6 T&S Response Operations Variable RFTs:

- **+4 Sydney (Lead and 3 RFTs)¹:** T&S is still not a 24/7 follow-the-sun operation. This is a material operational limitation, and our lack of 24/7 coverage puts additional strain on our US and UK RFTs, increasing retention risks. We request a Lead plus 3 specialists to add to the one T&S RFT currently in Sydney.
- **+1 US and +1 UK specialist:** T&S currently has 16.5 variable RFTs, 8.5 US and 8 UK specialists. T&S RFTs support high-judgment, high-priority workflows including LEO-Abuse, U13, Executive Escalations, Trusted Flaggers, and Rapid Rules (such as the new CSAM solicitation rule that we had to pause at 10%). The team is down to the bone and we are unable to react quickly to unexpected changes or new requests. T&S also experiences abnormally high shrinkage due to team members' absences likely related to the nature of the work; for example, a T&S Manager, Lead, and UK specialist are all on extended leaves with unclear return dates², and there is another recently departed UK specialist (unrelated to Compass) who we are working to backfill. Given the sensitivity of the content and wellness implications, the team would benefit from an additional specialist in the US and in the UK. Expanding the team would also mitigate retention risk for current team members.

Vendor HC:

Add 8 HC to the vendor L3 NCMEC escalation workflow to unblock rollout of the CSAM solicitation rule, bringing total vendor HC to from 445 to 453.

¹ From experience with the LEO team, we would need a minimum of 8 RFTs in Sydney to achieve a full follow-the-sun model. However, in the current circumstances, we are reducing the request to more minimal APAC coverage that would enable a once monthly week-long on-call rotation among 4 specialists.

² Although we are not currently requesting net new HC to account for this issue, we seek confirmation that T&S will get backfills if any of these individuals do not return to Snap.