

AMENDED Exhibit 1147

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

From: 'Agatha Baldwin' via CO Trust & Safety - Leads [REDACTED]
 Sent: 3/23/2018 9:16:16 PM
 To: [REDACTED] Juliet Shen [REDACTED]
 CC: CO Trust & Safety - Leads [REDACTED]
 Subject: Re: K-12 School in Search - Christ Church School

Yes let's raise back to eng. That shouldn't be possible.

On Fri, Mar 23, 2018 at 4:03 PM [REDACTED] wrote:
 Hi Leads,

The School has followed up that "This user continues to add to our story while not on our campus". I confirmed on the current Christ Church School (Greenville) Story content posted by "virtualthotonly".

db45a556f735166959778c37d6020a5b = confirmed poster: virtualthotonly

How should we follow up with Eng, they had confirmed on 2/26 the account was blacklisted. [REDACTED--AC]
 [REDACTED--AC] The school's
 email response below:

"Please block this user from adding to our story or remove our school's name as a location on your snap map. Our attorney will follow up. Thank you-"

ZD ticket here: <https://snapchat.zendesk.com/agent/tickets/20450100>

On Wed, Feb 28, 2018 at 11:23 AM, [REDACTED] wrote:
 Thanks Juliet!

I followed up with the school and they pushed back, response below. [REDACTED--AC]

Redacted--AC

[REDACTED--PII] Yesterday 05:56 pm

Yes, I understand the concept but the problem is your company has falsely identified our institution's location to include surrounding neighborhoods not associated with our school or our brand. These snaps are not taking place on our campus yet these users are posting to our story as if they are. The geo fence needs to be tightened or we need to have control of who is allowed to post to something in the name of our institution. I can't constantly be on the lookout to flag the content. It takes Snapchat days to respond and by that point the damage is done. We are asking one more time for your company to take this more seriously. Our lawyers and law enforcement will be involved as this is a school and to have users posting inappropriate content knowingly to an audience of minors is a clear violation of not only your company's terms and conditions but quite possibly the law. Please advise on:

1. How to tighten the geofence to only include our campus.
2. Remove any reference to our school.
3. Moderate posts before they are posted to any story using the name of our institution.

On Mon, Feb 26, 2018 at 5:22 PM, Juliet Shen <[REDACTED]> wrote:
She's on the blacklist and the blacklist [bug](#) has been fixed.

On Mon, Feb 26, 2018 at 4:50 PM, [REDACTED] wrote:
Awesome - thank you! I will remove the violating content.

Has she been confirmed blacklisted, none of her "Our Story" posts will go to the School's Search Story in the future? [Here](#) is my proposed response.

On Mon, Feb 26, 2018 at 4:46 PM, Juliet Shen <[REDACTED]> wrote:
Good to delete now!

On Mon, Feb 26, 2018 at 10:34 AM, Juliet Shen <[REDACTED]> wrote:
Can we please hold on deleting while [REDACTED] looks into it? He says that user is on the Search blacklist.

If we have to delete it now just give me a heads up and I'll let him know.

On Mon, Feb 26, 2018 at 10:27 AM, [REDACTED] wrote:
Ya, I can super delete the content in Snaplion or one flag take down, whichever is best. Unsure if we wanted to leave any content up to flag to the Search team that the issue is still happening before we remove the content? If not, I can remove all content now.

On Mon, Feb 26, 2018 at 10:25 AM, Agatha Baldwin <[REDACTED]> wrote:
Can you one flag takedown what is there right now?

On Mon, Feb 26, 2018 at 10:12 AM [REDACTED] wrote:

Sounds good to sync on response internally first - thanks Agatha.

FYI Snaplion data for content above:

Submission ID: globallivestory~fe8d57b783465314d2b3f7526728b770

Poster: virtualthotonly

Attachment URL: N/A

On Mon, Feb 26, 2018 at 10:08 AM, [REDACTED] wrote:
Her content is currently on the "Christ Church School in Greenville, SC Story."

Christ Church School
Wed in Greenville, SC



On Mon, Feb 26, 2018 at 9:56 AM, Agatha Baldwin <[REDACTED]> wrote:
Are we sure it was ongoing? I thought they just reverted the blacklist...so it might have just started again. Let's review an internal response first this afternoon

On Mon, Feb 26, 2018 at 9:53 AM [REDACTED] via CO Trust & Safety - Leads [REDACTED]
[REDACTED] wrote:

Thank you for following up on this Juliet! Once confirmed blacklisted, we can plan to follow up with the teacher.

Redacted--AC

On Mon, Feb 26, 2018 at 9:47 AM, Juliet Shen <[REDACTED]> wrote:
It's possible that they made changes to how the blacklist works, or disabled it, or a number of decisions and didn't loop us in. I'll check in with [REDACTED] and [REDACTED] (maps) today to get more info on the blacklist and ensure this particular user is blacklisted from posting to stories.

On Mon, Feb 26, 2018 at 9:45 AM, [REDACTED] via CO Trust & Safety - Leads [REDACTED] wrote:
Yeah, I think we should ask again.

@Juliet, any insight into why the user wouldn't be blocked when [REDACTED] said she added her to the blacklist?

Best,

[REDACTED]
Trust & Safety Operations

On Mon, Feb 26, 2018 at 9:35 AM, [REDACTED] via CO Trust & Safety - Leads [REDACTED] wrote:
Hi Leads,

This was the last thread around the reported user "virtualthotonly" posting content to the "Christ Church High School" Search Story?

[REDACTED] had said she was blacklisted, but her content was still coming up on the school's Search Story and I notified him of the issue.

Should I escalate this up to [REDACTED] again? Full thread below, originally the request was to block the school, then I requested to block a specific user, "jennypolevixen", who is "virtualthotonly" original account.

Appreciate any help since the issue was not resolved last attempt.

Thanks!
[REDACTED]

----- Forwarded message -----
From: [REDACTED]
Date: Wed, Nov 22, 2017 at 11:44 AM
Subject: Re: K-12 School in Search - Christ Church School
To: Nona Farahnik Yadegar [REDACTED]
Cc: [REDACTED] [REDACTED]

Sounds good! Will do so now - thanks!

On Wed, Nov 22, 2017 at 11:33 AM, Nona Farahnik Yadegar <[REDACTED]> wrote:

I know [REDACTED] must be swamped today with Cheetah; i think we should just delete the content for now

On Wed, Nov 22, 2017 at 11:32 AM, [REDACTED] > wrote:
Hi [REDACTED]

Bubbling this up - any update why the blacklisted account "virtualthotonly" is still able to post media to the "Christ Church High School" Search Story?

Appreciate your help in this sensitive matter.

Thanks!
[REDACTED]

On Tue, Nov 21, 2017 at 12:59 PM, [REDACTED] wrote:
Hi [REDACTED]

The account previously blacklisted "virtualthotonly" currently has 10+ Snaps posted to the current "Christ Church High School" - how can this be?

Ex/ Story IDs: ff0446995665ff9e53b01e79f93cea3c, 12d77399fc91dd46dff20238676d9ac3

The school is very upset this user's content continues to be found associated to their school.

Let me know any other information needed.

Thanks!
[REDACTED]

On Fri, Nov 10, 2017 at 9:00 AM, [REDACTED] wrote:
Thank you [REDACTED]

On Thu, Nov 9, 2017 at 9:19 PM, [REDACTED] wrote:
hi [REDACTED],

Added to our blacklist

On Thu, Nov 9, 2017 at 4:57 PM, [REDACTED] wrote:
Hi [REDACTED]

Any update on getting this user 'virtualthotonly' blacklisted from Search?

She is still posting content to the "Christ Church School" Story today.

Thanks!
[REDACTED]

On Wed, Nov 8, 2017 at 10:52 AM, [REDACTED] wrote:
Hi [REDACTED]

The account 'jennypolevixen' was deleted for ToS and has created a new account that continues to post violating content to the "Christ Church School" Story.

Can you blacklist user 'virtualthotonly'?

Thank you!

On Fri, Nov 3, 2017 at 4:31 PM, [REDACTED] wrote:
yes

On Fri, Nov 3, 2017 at 4:27 PM, [REDACTED] wrote:
Thank you [REDACTED] Does this mean starting tomorrow her content will be blocked?

I will remove her Snaps in the "Christ Church School" Story now.

Thanks!

On Fri, Nov 3, 2017 at 4:24 PM, [REDACTED] wrote:
hi [REDACTED]

I have added this user to the blacklist but this will be effective after one day. (Normally we don't see many user blacklisted so we update only daily)

On Fri, Nov 3, 2017 at 4:05 PM, [REDACTED] wrote:
Hi [REDACTED]

The user is back posting to the "Christ Church School" Story, her username is "jennypolevixen".

Can she be blacklisted?

Appreciate your help!

On Fri, Nov 3, 2017 at 10:44 AM, [REDACTED] wrote:
We currently do not have an automatic approach for you to remove the entire Search Story. But if you find anything offensive, please let us know. We may block the entire story based on caption or geo locations etc.

On Fri, Nov 3, 2017 at 10:40 AM, [REDACTED] wrote:
I removed the content this morning so will continue to monitor for posts and provide you with the username in question asap.

In regards to removing the entire Search Story, is this something we can do for elementary schools that are reported to Trust and Safety?

Thanks!

On Fri, Nov 3, 2017 at 10:38 AM, [REDACTED] wrote:
hi Nona [REDACTED]

Do you have this user's id or username? I can add it to our user blacklist. I cannot find any sensitive content in the current version of this story and thus not able to identify the user.

On Fri, Nov 3, 2017 at 10:15 AM, Nona Farahnik Yadegar [REDACTED] wrote:

Thanks, the user's posts keep showing up in the school story and lowering the potential quality

On Fri, Nov 3, 2017 at 10:14 AM, [REDACTED] wrote:
we have a user blacklist but it's for all stories

On Fri, Nov 3, 2017 at 9:57 AM, [REDACTED] via Ranking Spam [REDACTED] > wrote:

Also, is there a way for Eng to block a user from posting to a specific Search Story?

Appreciate your help!

[REDACTED]

On Fri, Nov 3, 2017 at 9:53 AM, [REDACTED] wrote:
Hi Team,

Following up on this - what is the status on blocking the elementary school "Christ Church School" in Greenville, SC" from being available in Search?

Violating content continues to be posted to this Story.

Let me know any questions.

Thanks!

[REDACTED]

On Thu, Nov 2, 2017 at 1:51 PM, [REDACTED] via CO Trust & Safety [REDACTED] wrote:

Hello,

A K-12 Catholic school claims there is questionable content being posted in a Search Story, "Christ Church School" in Greenville, SC, and states that the content posted is negatively impacting their brand.

Our team has reviewed the Story and proactively removed violating content. However, we are concerned that an elementary school is being made available in Search.

How do you guys treat elementary and high schools in the same location?

Thanks in advance,

--

You received this message because you are subscribed to the Google Groups "CO Trust & Safety" group.

To unsubscribe from this group and stop receiving emails from it, send an email to [REDACTED]

To post to this group, send email to [REDACTED]

To view this discussion on the web visit

https://groups.google.com/a/snapchat.com/d/msgid/co-trustandsafety/CAGSEZMz4fFXo%2B%2Bob6Z5uZoveLBx0uWQo7bj_JM337iYew0diGA%40mail.gmail.com.

--

You received this message because you are subscribed to the Google Groups "Ranking Spam" group.

To unsubscribe from this group and stop receiving emails from it, send an email to [REDACTED]

To post to this group, send email to [REDACTED]

To view this discussion on the web visit

<https://groups.google.com/a/snapchat.com/d/msgid/ranking-spam/CAC6%2BpwPoaDP2Xx8Obm17AMatQpGq2jg5JxnoWHFYd6qkpz3shQ%40mail.gmail.com>.

--

Nona Farahnik Yadegar

Trust & Safety Manager | Snapchat

Snap Inc.

3 [REDACTED]

--

Nona Farahnik Yadegar
Trust & Safety Manager | Snapchat
Snap Inc.
[REDACTED]

--

You received this message because you are subscribed to the Google Groups "CO Trust & Safety - Leads" group.

To unsubscribe from this group and stop receiving emails from it, send an email to [REDACTED]

To post to this group, send email to [REDACTED]

To view this discussion on the web visit <https://groups.google.com/a/snapchat.com/d/msgid/co-leads-trustandsafety/CAC6%2BpwM2RTnLacKmYRYj6gGkrNVb6FoiMOUWHEyxNge-EaXy5g%40mail.gmail.com>.

--

You received this message because you are subscribed to the Google Groups "CO Trust & Safety - Leads" group.

To unsubscribe from this group and stop receiving emails from it, send an email to [REDACTED]

To post to this group, send email to [REDACTED]

To view this discussion on the web visit https://groups.google.com/a/snapchat.com/d/msgid/co-leads-trustandsafety/CAPL2n7kxY17AKv5x1OQfbKURhQe_YTLnmhuJjx-uDbLY3HQ7uQ%40mail.gmail.com.

--

Juliet Shen
Technical Program Manager | Snapchat
Snap Inc.
[REDACTED]

--

You received this message because you are subscribed to the Google Groups "CO Trust & Safety - Leads" group.

To unsubscribe from this group and stop receiving emails from it, send an email to [REDACTED]

To post to this group, send email to [REDACTED]

To view this discussion on the web visit <https://groups.google.com/a/snapchat.com/d/msgid/co-leads-trustandsafety/CAC6%2BpwN58pHkq25CKXWVL98zsWAyoV%3DYkUxRSGyPT3bKKKeOpPg%40mail.gmail.com>.

--

Juliet Shen

Technical Program Manager | Snapchat
Snap Inc.
[REDACTED]

--

Juliet Shen

Technical Program Manager | Snapchat
Snap Inc.
[REDACTED]

--

Juliet Shen

Technical Program Manager | Snapchat
Snap Inc.
[REDACTED]

--

You received this message because you are subscribed to the Google Groups "CO Trust & Safety - Leads" group.

To unsubscribe from this group and stop receiving emails from it, send an email to [REDACTED]

To post to this group, send email to [REDACTED]

To view this discussion on the web visit https://groups.google.com/a/snapchat.com/d/msgid/co-leads-trustandsafety/CAMn%2BB-HdvDjdc_j8P9xVdntp6hbJxSmQn0_gdbxCEAkGU3gjwA%40mail.gmail.com.