

AMENDED Exhibit 131

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

Message

From: [REDACTED] [/O=THEFACEBOOK/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=[REDACTED]]
Sent: 3/2/2022 12:22:23 AM
To: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; Alex Dow [REDACTED]; Diego Castaneda [REDACTED]; Justin Cheng [REDACTED]; [REDACTED]
Subject: Message summary [{"otherUserFbId":null,"threadFbId":5188057334546465}]

[REDACTED] (3/01/2022 10:05:29 PST):

>> which path better mitigates active risk for the company by enabling Topic Nudge and December public commitments to land quickly?
 >Agreed and elaborating on Justin's reply from execution POV,
 >#3, we have to do that anyways for Topic Nudge. P0.
 >#2, we are adding a hard dependency on timing, and additional work even after the framework is up. It doesn't help IG mitigate active risks or move fast on public commitment, related to IG's own problem NAC.
 >#1, escalation takes time but this takes way less time than #2. We can't avoid an escalation, even in route #2 people could disagree on how to measure NAC through PU framework. I'm leaning towards we escalate early, i.e. taking route #1. Even we don't win, we gain material perspective that will aid #2 alignment.

[REDACTED] (3/01/2022 10:12:44 PST):

>the email does say that the next step is [REDACTED] it also says that [REDACTED] / CWB is advocating that if we want to pursue NAC measurement, it should go to the VP level (on the central side this is Pratiti and Emily Dalton Smith)

[REDACTED] (3/01/2022 10:13:13 PST):

>I have time later today with [REDACTED] (Central WB PM)

[REDACTED] (3/01/2022 10:13:44 PST):

>I'm thinking about if there's a way to accelerate this.
 >
 >and if not, that we should set expectations for how long it realistically could take to get through these steps

[REDACTED] (3/01/2022 10:15:40 PST):

>Andy has confirmed for me that CWB isn't asking for more reviews for the product work.
 >
 >But since getting products to market is our P0, I want to fully derisk execution for a May Topic Nudge launch and for Take a Break launches for driving adoption

[REDACTED] (3/01/2022 10:16:55 PST):

>I've also asked that Central Well-being give us a much more concrete plan for how they'd execute the PU measurement path and how they'd invite us to participate.
 >
 >We've said we also want this.

Dr. Diego Emiliano Castaneda (3/01/2022 10:20:26 PST):

>I think it's worth keeping the meeting at 12:35. What other questions do we have for them?

Dr. Diego Emiliano Castaneda (3/01/2022 10:20:43 PST):

>(we have a meeting with CWB at 12:35)

Jus-Tin Cheng (3/01/2022 10:34:45 PST):

>In the near term these launches should not be affected much by CWB discussions - we can still build what we need.

Jus-Tin Cheng (3/01/2022 10:36:24 PST):

>1. Strategy aside, do they have feedback on the NAC survey questions?
 >2. Why do they think NAC is part of PU (or perceive it as unimportant)?
 >3. What is their roadmap for PU and what would our involvement be?

[REDACTED] (3/01/2022 10:37:28 PST):

>re: #2, it would be relevant to share the state of the union draft's mention of social comparison:
<https://docs.google.com/document/d/1awrlctsnbseSdYwN6mOssIsFOtPWFJie6uZzsEtqVxI/edit>

[REDACTED] (3/01/2022 10:39:19 PST):

>Can you all also ask if they have a conceptual framework for PU? It would be helpful to know what short-term & long-term outcomes of PU they're examining - e.g., poor sleep? Are they viewing NAC as a potential

outcome of PU? PU is a behavior "usage that leads to negative life effects".. not an outcome.. so it'd be helpful to know what outcomes they're measuring.

Paul Alexander Dow (3/01/2022 10:40:21 PST):

>I'm just dropping in to express my continued interest and support for a focus on appearance comparison. I can appreciate the need to be tactical so that we can advance product priorities, but, if we need to make the case to VPs about the importance of maintaining our momentum on NAC, I'm happy to do whatever I can to support that.

(3/01/2022 12:29:26 PST):

>I just chatted with [REDACTED] about this. She thinks that ultimately Pratiti will need to weigh in as someone will need to understand and get buy in on assuming the potential risks here. I think it would be helpful in that meeting to also have someone who can speak to the history with IG leadership and leadership buy-in or interest in NAC specifically.

(3/01/2022 12:30:57 PST):

>I don't think 1 and 2 and 3 are mutually exclusive, right? My understanding is that we are interested in both NAC and PU for different potential levers. So I think making sure we're also doing 2 and 3 make sense here to me as well? But I might be missing something

(3/01/2022 12:30:59 PST):

>I assume we'd need to do a joint review

(3/01/2022 12:31:20 PST):

>we need to establish a decision making forum that's binding so we can stop the spin

(3/01/2022 12:31:45 PST):

>this is the prime example I think for what [REDACTED] flagged to Communities for increasing decision velocity for "Move Fast"

(3/01/2022 12:32:57 PST):

>I, like Alex, will be there and can help, but I think from my discussions w/ [REDACTED] I think what will most help Research leadership will be to understand the product strategy and voice and why NAC is believed to be important there.

Jus-Tin Cheng (3/01/2022 13:13:59 PST):

>From the last meeting, sounds like next steps is to meet with [REDACTED]/Pratiti to get buy-in (again) for NAC?

>

>Key notes:

- >- There was previous alignment between Pratiti/Adam/[REDACTED] on the focus on NAC
- >- Differences in strategy focusing on reduction vs. on agency/control
- >- Differences in perception of whether FB/IG "causes" NAC
- >- Differences in perception of quality of research backing focus on NAC
- >- In any case, survey work still seems blocked pending agreement on how NAC should even be measured ([REDACTED] said that CWB will not simply give feedback on individual survey questions).

(3/01/2022 13:42:11 PST):

>One other note was that they decided not to prioritize 'social comparison', of which 'appearance comparison' and 'negative appearance comparison' are subsets. I think they were generally conflating NAC with social comparison.

>

>We went through an evolution on our team to focus in on NAC because we agree that 'social comparison' is not necessarily good or bad. However, external research consistently points to appearance comparison as a key step towards internalization of the 'thin ideal' and other beauty ideals which often lead to body image issues and for some eating disorders/ suicide/ self injury. The prevalence of all of which are historically high and growing- particularly among teens.

>

>The fact that these appearance comparisons are made much more frequently on IG vs competitors (including FB) has been shown to be due to the visual nature of the app.

>

>I do think we're looking at a very different sets of facts.

Dr. Diego Emiliano Castaneda (3/01/2022 14:14:59 PST):

>This is a pretty good summary of the primary takeaways that I got as well. A few things I jotted down >- While we do have precedent and evidence for our strategy, the landscape of how research is conducted and perceived colors these conversations and speaks to the need to escalate again. We've been asked to give the context and guidance we got in previous meetings (thanks for forwarding the email [REDACTED])

>- Related, working in a new centralized research organization necessarily demands cohesion.

>- We can't ask them to look only at specific survey items. They want to see the overall approach, including rigorous survey development methods .

>- I heard several times that they didnt want to be perceived as blockers but they have a pov they have as "domain experts" and "its up to others above them to make a different"

>- we didn't get to talk about process steps and potential timelines about working together on problematic use.

>- Our team seem aligned with pursuing escalation. (and to reiterate getting to clarity requires alignment on squaring what we pursue as success: agency/control vs reduction)

[REDACTED] (3/01/2022 14:16:07 PST):

> [REDACTED] will help frame up the escalation to Pratiti and Pavni

[REDACTED] (3/01/2022 14:16:58 PST):

> meantime, it would help to get more specifics on what they're proposing as the alternative to defining success in terms of reduction

[REDACTED] (3/01/2022 14:17:40 PST):

> it's clear from the end of the meeting that the fundamental disagreement starts with IG defining success in terms of reduction

Jus-Tin Cheng (3/01/2022 14:31:32 PST):

> Checking in with [REDACTED] too, but from past conversations with CWB, increasing feelings of agency & control could be the alternative definition of success.

[REDACTED] (3/01/2022 14:34:10 PST):

> re. FB/IG 'causes' NAC and 'reduction vs agency and control'

> I think we may be philosophically in different stances about our responsibility to users. CWB seems to want to believe 'we're just a platform', which... hasn't been a good strategy in the past and I'm not sure why it's seen as viable now. This is, as I understand it, what is underpinning the 'agency and controls only' approach.

> Our team is interested in understanding areas in which our platform is amplifying potentially harmful/negative parts of society and using whatever levers we can unblock. If all we unblock is agency and controls based on the research and conviction, we'll keep pursuing that strategy. But if we can make a compelling case for ranking changes or other reduction strategies- we aren't philosophically opposed to pursuing that because we don't believe that the platform is inherently neutral and we do believe we have an obligation to nudge it closer to being neutral.

> We also do not believe that all teens are mature enough to take agency and control negative experiences- assuming they recognize the experience as negative to begin with. This also feeds into a desire to keep reduce strategies available.

> (I know not 100% of the team past and present is necessarily fully aligned with these principles- but these are the ones that the plurality have adopted in pursuing problem spaces hence use of 'we'.)

[REDACTED] (3/01/2022 15:32:39 PST):

> I realize I'm very removed from this conversation and all the back-and-forth you all have been having with CWB, so take all of this with a grain of salt. I wanted to +1 this comment from [REDACTED]: "We also do not believe that all teens are mature enough to take agency and control negative experiences- assuming they recognize the experience as negative to begin with. This also feeds into a desire to keep reduce strategies available."

> From adolescent health research, we know many teens do not have the self-awareness to actually self-regulate (i.e., take agency and control over their experience).

> And from a broader public health perspective: I think it's very limiting to focus on the individual locus of control, *especially* when we're talking about teens. So many other interpersonal & environmental factors drive the experiences of teens -- and often individual-level levers are not enough to move the needle on complex social dilemmas like NAC. I think agency & control is an important part of the solution, I'm just not confident it's enough on its own. To create real change in the experiences people have on our platform, I think we need to combine individual levers with norm and ecosystem changes. Focusing on PU or agency/control alone puts all the onus -- and also blame! -- on the individual user without owning our role in the problem. This has been echoed by Pavni who has emphasized the need to address upstream effects on content as well. Just my two cents :)

Dr. Diego Emiliano Castaneda (3/01/2022 15:36:55 PST):

> [REDACTED] beat me to the punch. +1 to all that.

Jus-Tin Cheng (3/01/2022 16:20:18 PST):

> FYI, here is the doc [REDACTED] shared that outlines the two approaches ("Prevalence" = Reduction; "Current Success states" = alternative approach): <https://docs.google.com/document/d/1CkK16vE8SAb2kgbke1-e317VJiKLpwpXi8oF1dVTyv4/edit#bookmark=id.21zk7lwya5k8>

Jus-Tin Cheng (3/01/2022 16:22:23 PST):

> Our current favored approach is actually a blend of both, so I wonder if we actually need to pick between the two.