AMENDED Exhibit 138

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

Sent: Tuesday, December 12, 2017 7:30:27 AM
To: [redacted]
Subject: Time sensitive

Can you or someone in Comms so quickly a version we can send him? He is on air all morning and pulling out what he has said and our responses is worthwhile - especially when he is factually wrong

Does that doc address his point that wa led to killing people?

[redacted] and [redacted] - not really fair for [redacted] to do this. Can you get someone to do it fast?

From: [redacted]
Sent: Tuesday, December 12, 2017 7:25:29 AM
To: Sheryl Sandberg; [redacted]
Subject: RE: Quick note...

No – most of that doc (reattaching here) is background for you on what Chamath has said about us publicly over the past few months.

There is one section where [redacted] outlined talking points for Chamath, but he already sent those over pre the thread below.

From: Sheryl Sandberg
Sent: Tuesday, December 12, 2017 7:18 AM
To: [redacted]
Subject: Fwd: Quick note...

Is the doc you wrote ok to send to him?

From: Chamath Palihapitiya <chamath@socialcapital.com>
Sent: Tuesday, December 12, 2017 1:37:52 AM
To: [redacted]
Cc: Mark Zuckerberg; Sheryl Sandberg
Subject: Re: Quick note...

Thank you for this. Noted and ingested. I'll be cohosting CNBC all morning. Will address when/if it comes up and add generally to my talking points for the future.

Again sorry.
C

On Mon, Dec 11, 2017 at 11:38 PM [redacted] wrote:

Chamath,

Thanks for your note and apology – it never surprises me that you are quotable, and I appreciate your recognition about how unfair and damaging your remarks are to the company, what we were trying to achieve while you were here and what we have been working on since.

I have not spoken on this with Mark or Sheryl, but my hope is that your future remarks – and indeed, any clarification you can make – would highlight the following points (which I hope capture your feelings as a former

executive and leader here):

- When I was at Facebook we did not focus sufficiently on the dangers associated with connecting the world and giving everyone a voice—and that was a mistake.
- We were focused on innovating new experiences and offering new products for people in areas ranging from basic communication and connection – finding old friends and long lost family, to holding governments accountable by speaking out or encouraging citizens to register to vote. More recently, I've seen this continue with Facebook's efforts on civic engagement and social good like safety check and donations. I think these are good things and am proud of them, but they are only part of the picture and part of Facebook's responsibility.
- As a result, when I was at Facebook we under-invested in protecting users from bad actors: crooks, spammers, duplicitous political propagandists, foreign intelligence agents, etc.
- Since I have left, I believe the folks at Facebook have learned this lesson, painfully sometimes.
- I know they take this seriously. As Mark announced on their last earnings call — he recognizes that the company not where he wants it to be and is committed to sacrifice profitability to address it -- by investing more in more people and technology to protect the security of the Facebook service and the people who use it.

This isn't perfect and of course I would never expect you to follow any script. But I think you believe – and hope you can make clear (frankly, as you did at Stanford), that

- Facebook has done incredibly positive things to bring people together
- Our long-term interests are closely aligned to offering a meaningful and valuable service to the people who use it.
- We have recognized where we have fallen down and committed to improve
- We have a track record of successfully fixing problems we identify

I know we are set to meet later this week – and we can add this to our agenda! Feel free to call or reach out before then.

[redacted]

[redacted] | VP Communications & Public Policy
Facebook | [redacted]
www.facebook.com/[redacted]
O: [redacted] | F: [redacted]
Mailing Address: 1601 Willow Road, Menlo Park, CA 94025

From: Chamath Palihapitiya <chamath@socialcapital.com>
Date: Monday, December 11, 2017 at 4:39 PM
To: [redacted] "Mark Zuckerberg (p)" [redacted] Sheryl Sandberg [redacted]
Subject: Quick note...

Hi guys,

I just wanted to drop you a note. I'm really sorry about all the pickup today. When I spoke at Stanford a month ago, I spoke, in part, about some of the effects of social media and then my specific use. When I did, I didn't do a good

enough job of separating me as an individual vs me as a former exec.

It was easy to amplify what and how I said things and i could have been crisper. For this I can only offer my apologies.

Anyways, I'm sorry and hope we can keep moving forward.

Chamath

DOCUMENT SLIPSHEET

Bates Number: META3047MDL-022-00046397-META3047MDL-022-00046410

Custodian: SANDBERG_SHERYL

Author:

Filename: RE: TIME SENSITIVE

Create Date: 12/12/2017 10:30 AM

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TNAG BEGBATES: METATNAG-006-00046397

TNAG ENDBATES: METATNAG-006-00046410

MAAG BEGBATES: 0

MAAG ENDBATES: 0

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