

AMENDED Exhibit 152

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: Mark Zuckerberg [/O=THEFACEBOOK/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=REDACTED]
Sent: 4/13/2014 11:25:43 PM
To: Jay Parikh [REDACTED]
CC: Product Group Leads [REDACTED]
BCC: [REDACTED]
Subject: Re: Q1 goals update



The most concerning of these to me is time spent.

Most of these goals I view as in our control, but time spent seems more subject to macro trends we're just trying to predict around the balance of apps people will use and Facebook's place among them.

If we think we're doing the right things to drive time spent and the number still isn't increasing much, that suggests our thesis on how we expect people broadly to spend time and use different apps could be wrong.

That might imply our core product growth is flat or close to falling into decline, which would mean we'd need to very rapidly shift emphasis to other areas to accelerate future growth, like in messaging.

It's too early to conclude how this will look at the end of Q2, especially with all the measurement issues. But if we end up meaningfully below our goal here, we'll need to have some tough conversations about where we focus to make sure we're spending our time building the products people will increasingly want in the future.

Of course the other goals are all important as well, but this is the one that threatens our core narrative the most.

On Apr 12, 2014, at 11:36 AM, "Jay Parikh" <[REDACTED]> wrote:

Fwding to this group as well.

Begin forwarded message:

From: Susan Li <[REDACTED]>
Date: April 9, 2014 at 9:05:57 AM PDT
To: Mike Schroepfer <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>, Jay Parikh [REDACTED]
Subject: Q1 goals update

Growth

- <!--[if !supportLists]--><![endif]-->Facebook: 820M DAP ([Internet.org](#) 3M) and 1,310M MAP ([Internet.org](#) 4M)
 - <!--[if !supportLists]--><![endif]-->Core: currently +6.1M above DAP target and up +3.6M above MAP target (although each will probably take a ~1M user hit when Globe Philippines ends its all-free FB promo on 4/25)
 - <!--[if !supportLists]--><![endif]-->[Internet.org](#): On track vs. targets (+85K vs. MAP target and have hit our DAP target for 1H), but same risk with Globe as above
- <!--[if !supportLists]--><![endif]-->Instagram: 135M DAP, 195M WAP, 240M MAP

- <!--[if !supportLists]--><![endif]-->Well above goal on DAP, above on WAP, on track for MAP

Messaging: 8B mobile sends and 2B messenger-to-messenger sends

- <!--[if !supportLists]--><![endif]-->We are 16% behind on the mobile sends goal and 12% behind on messenger-to-messenger sends. If we launch Diode in Q2 we are likely to hit the M2M goal. The shallowness on the mobile send front has a lot to do with the steep decline in web sends in Q1 (from ~6.5B to ~5.5B) since there's significant interplay between platforms and fewer conversations are being generated from www.

Engagement

- <!--[if !supportLists]--><![endif]-->Time spent: grow by 5% for H1 (across all interfaces, including IG and Messenger)
 - <!--[if !supportLists]--><![endif]-->Currently growing between 1-2.5% YoY for Web+Android+iPhone+msite; it's difficult to understand the scale of cannibalization from interfaces that were not measured last year such as Messenger, Instagram, Snaptu

Utility

- <!--[if !supportLists]--><![endif]-->Queries: 1,011M search queries per day by 6/30
 - <!--[if !supportLists]--><![endif]-->Tracking 2.6% below goal though we have seen growth in overall searches / DAP from 1.01 to 1.07 over Q1

Business

- <!--[if !supportLists]--><![endif]-->Revenue: Meet or exceed budget plan
 - <!--[if !supportLists]--><![endif]-->On track
- <!--[if !supportLists]--><![endif]-->Efficiency: 20% or lower data weight growth and app weight growth of 0% for 2014
 - On track for both, about 1-2% over app weight goal (but not concerning at beginning of year) and already at -9% data weight growth for Q1

Ship Love

- <!--[if !supportLists]--><![endif]-->Brand: Begin tracking and set goals for improving feedback we get from people who are shown the statement: "Facebook cares about me".
 - <!--[if !supportLists]--><![endif]-->Have decided to use Facebook "cares about me" and "cares about its users" on the main tracking survey in Q2; both questions are translated in ~30 languages and we are now capturing data on both
- <!--[if !supportLists]--><![endif]-->Mobile product quality: Raise our internal star rating to 4.2 stars and decrease the amount of time people spend waiting in our apps by 40%
 - <!--[if !supportLists]--><![endif]-->At risk re: 4.2 star rating (moving ISR is really hard) and on track re: p90 wait time improvements

DOCUMENT SLIPSHEET

Bates Number: META3047MDL-046-00112613-META3047MDL-046-00112614

Custodian: BOSWORTH_ANDREW; COX_CHRIS; OLIVAN_JAVIER; SYSTROM_KEVIN;
ZUCKERBERG_MARK

Author:

Filename: RE: Q1 GOALS UPDATE

Create Date: 4/13/2014 4:25 PM

Last Modified Date: 4/13/2014 4:25 PM

TNAG BEGBATES:

TNAG ENDBATES:

MAAG BEGBATES:

MAAG ENDBATES:

File Path: /COX_CHRIS/TOP OF PERSONAL FOLDERS/INBOX; /ZUCKERBERG_MARK/TOP OF
PERSONAL FOLDERS/INBOX; /BOSWORTH_ANDREW/TOP OF PERSONAL FOLDERS/INBOX;
/SYSTROM_KEVIN/TOP OF PERSONAL FOLDERS/INBOX; /OLIVAN_JAVIER/TOP OF PERSONAL
FOLDERS/INBOX

Confidentiality Designation: HIGHLY CONFIDENTIAL (COMPETITOR)

META_Pointee:

META_Pointer: