

AMENDED Exhibit 186

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=3F2923EE71524A8B95BF75135B81802B-JOTHAM]
Sent: 4/23/2021 11:36:43 PM
To: [REDACTED] Ravi Sinha [REDACTED] [REDACTED]
Subject: Message summary [{"otherUserFbId":null,"threadFbId":3405461332799711}]

[REDACTED] (4/23/2021 09:54:44 PDT):
 >Anything you're aware of on this one @Sarah?

[REDACTED] (4/23/2021 15:35:22 PDT):
 >YES, we are actively working on a set of FoA wide Youth Principles to guide products but in the meantime, we have various implementation guidance docs on when we should gate users out of products and specific threshold guidance for our IIC classifier and Age models.

[REDACTED] (4/23/2021 15:37:18 PDT):
 ><https://docs.google.com/document/d/1BN43J1FscB1rpUg4Ng08NFZVQiMY4ZyMgEeyR5a50cY/edit>

[REDACTED] (4/23/2021 15:37:38 PDT):
 >Which plugs into: https://docs.google.com/document/d/1xW6SglSKO-0-MC_dh-95Mob23ZLfsOWwZQ3qBACmEAM/edit

[REDACTED] (4/23/2021 15:39:19 PDT):
 >Great, thanks! I'll start by pointing to the team to those to begin with.

[REDACTED] (4/23/2021 15:39:37 PDT):
 >And here's a Child Safety 101 guide for products that includes guidance on how to use the Age models for child safety: <https://fb.quip.com/DZLFAibk1xPQ>

[REDACTED] (4/23/2021 15:42:05 PDT):
 >Another side topic - are there any workstreams in progress on minor sexualization groups we're missing? I've been looking at groups with % of disabled accounts as part of some groups risk tiering work, and the query turns up a bunch of groups like "beauty boys of" or "looking for a girlfriend/boyfriend age 9, 10, 11, 12, etc."

[REDACTED] (4/23/2021 15:42:58 PDT):
 >I think the way to think about it is -- the PIG guidance gives you a high level overview of whether or not your product qualifies as "high risk" "sensitive" or "core"

[REDACTED] (4/23/2021 15:43:00 PDT):
 >Johanna mentioned she was a part of something, so I could just pass the queries to her as a starting point

[REDACTED] (4/23/2021 15:43:41 PDT):
 >and if you're high risk or sensitive, it's very much recommended that we include child safety mitigations

[REDACTED] (4/23/2021 15:45:11 PDT):
 >I'm so glad you're doing this! I haven't had the bandwidth to tackle this in earnest to whip up the XFN support but this has been on my TO-DO list for a while now

[REDACTED] (4/23/2021 15:45:32 PDT):
 >FB Groups just completed an integrity sprint in response to the capitol riots

[REDACTED] (4/23/2021 15:45:56 PDT):
 >and as part of that workstream, I was able to identify projects and PM led initiatives that we should piggy back on to clean up the minor sexualization space

[REDACTED] (4/23/2021 15:46:47 PDT):
 >bottom line, no, we're not very good at proactively detecting and taking down MS Groups and it's a big problem we need to tackle sooner rather than later b/c they are VERY publicly visible and leads to PR fires and stakeholder complaints and they get deployed against us as proof points that we're not taking child safety seriously

[REDACTED] (4/23/2021 15:47:43 PDT):
 >Up until last half, even Child Safety CI had no workstream set up to do bulk enforcement against FB Groups with _clearly_ violating content in either CEI or MS

[REDACTED] (4/23/2021 15:47:55 PDT):
 >OK, great, Groups Integrity is within my team's sub-pillar now - though the responsibility is now split across more functional teams like Eligibility / Entity & Actor Understanding / Enforcement / De-amplification. We are working with Entity & Actor Understanding on risk tiering for Groups, as our criteria has been very blunt in the past (i.e. >1000 member groups can't have open rooms).

[REDACTED] (4/23/2021 15:48:05 PDT):

>We also didn't have an implicit minor sexualization policy stood up until this half

[REDACTED] (4/23/2021 15:48:08 PDT):

>we now do:

[REDACTED] (4/23/2021 15:48:16 PDT):

>so we can start enforcing against them more aggressively

[REDACTED] (4/23/2021 15:48:45 PDT):

>Child safety was not one of our org's priorities, as they focus on higher prevalence issues historically like misinformation, civic/health/etc. issues, nudity/sexual solicitation, but we are looking to get it on the radar a bit more with risk tiering

[REDACTED] (4/23/2021 15:49:33 PDT):

>oh yes, Antigone's guidance to me was -- for Groups, right after misinfo and civic, child safety should be prioritized b/c child safety continues to be used as a wedge issue to fight e2ee

[REDACTED] (4/23/2021 15:50:00 PDT):

>and the way we keep getting distinguished from the Apple's of the world is that we're connected to the social graph and a public surface, i.e. FB Groups

[REDACTED] (4/23/2021 15:50:07 PDT):

>where bad actors can _signal_ one another

[REDACTED] (4/23/2021 15:50:14 PDT):

>and look for and connect with kids

[REDACTED] (4/23/2021 15:50:21 PDT):

>and then enter a private messaging thread

[REDACTED] (4/23/2021 15:50:32 PDT):

>so it's one seamless flow of discovery-->connection-->harm

[REDACTED] (4/23/2021 15:50:54 PDT):

>if you watch any of the congressional testimony, we get _creamed_ on this point while Apple gets off scot free

[REDACTED] (4/23/2021 15:51:40 PDT):

>Right, makes sense. Good to know you are raising it from your side then at the moment. Some of the child safety related signals like % accounts disabled for child safety might be useful inputs/features into the risk tiering models, so I'll be putting together some options for inclusion from our end

[REDACTED] (4/23/2021 15:53:03 PDT):

>oh, PLUS, we currently have liability risk under existing law for minor sex trafficking, sex trafficking and prostitution in general so yes, good to prioritize that problem area as well

[REDACTED] (4/23/2021 15:53:38 PDT):

>awesome to hear you're working on Groups Integrity!! Who are your main PM partners so that I can help advocate prioritizing this with them as well?

[REDACTED] (4/23/2021 15:56:50 PDT):

(<https://www.internalfb.com/profile/view/594874457>) is PM on Entity & Actor Understanding. This team owns the risk tiering modeling workstream that is about to begin

[REDACTED] (4/23/2021 15:58:45 PDT):

>(https://www.internalfb.com/profile/view/1569364532) is the PM on my team Rooms/Events Integrity who filled [REDACTED] role. We are now acting kind of like customers for Entity & Actor Understanding's risk tiering and have got Rooms as an example case for their MVP. E.g. if we wanted to give Rooms back to more Groups, we need a good understanding of all the risk and capabilities to filter out low risk from high risk, particularly for minor safety

[REDACTED] (4/23/2021 15:59:37 PDT):

>Our team also is an integrity starting point for new products on FB App in general, so we are seeing the same issue come in with say Chats in Groups, where we need better risk tiering to enable these features safely

[REDACTED] (4/23/2021 16:02:18 PDT):

>there's a mini summit on Monday and Tuesday that you might be interested in - let me share here

[REDACTED] (4/23/2021 16:03:07 PDT):

><https://fb.workplace.com/groups/233981627049481/permalink/1149093758871592/>

[REDACTED] (4/23/2021 16:03:43 PDT):

>heads up too, sadly I won't be working in this space much longer. I decided to switch teams within FB to a product team in the Assistant org, so I'll be handing over much of this work. I'm formally switching sometime next week, but will make sure these problems are on people's roadmaps before I fully step back

[REDACTED] (4/23/2021 16:07:17 PDT):

shared: <http://www.facebook.com/1037136353479016> as 11382767_633163463450050_1934906805_n.gif

[REDACTED] (4/23/2021 16:08:21 PDT):

>we'll be SO SAD to lose you here BUT I'm sure exciting things await you in Assistant + I'm sure our paths will cross b/c you can't shake child safety from most products!

[REDACTED] (4/23/2021 16:08:28 PDT):

>congrats on the move!!!

[REDACTED] (4/23/2021 16:11:58 PDT):

>yah, I'm feeling the same way. Really enjoyed working with both of you and everybody else on Rooms and child safety!

[REDACTED] (4/23/2021 16:14:27 PDT):

>I remembered seeing on [REDACTED] MVP doc for the risk tiering a question in relation to prioritizing child safety: "open question - how do we reconcile this against the fact that child safety is not prioritized overall in our subpillar?"

[REDACTED] (4/23/2021 16:15:04 PDT):

>^ just so you're aware that this definitely be worth something you advocating for to make sure it gets attention

[REDACTED] (4/23/2021 16:18:38 PDT):

>awesome! If you'd feel comfortable and have good relationships with [REDACTED] and [REDACTED], would you mind introducing us?

[REDACTED] (4/23/2021 16:32:06 PDT):

>yea! let me start a chat thread. [REDACTED] is on PTO til Tuesday, but there is a monthly business review for [REDACTED] team in relation to risk tiering on Monday afternoon with our sub-pillar leadership. Your input might give him another voice to include if useful

[REDACTED] (4/23/2021 16:35:51 PDT):

>^ will set a reminder to start this Monday morning

[REDACTED] (4/23/2021 16:36:31 PDT):

>thank you!! In the meantime, have a wonderful weekend!

[REDACTED] (4/23/2021 16:36:43 PDT):

>you too!