

AMENDED Exhibit 197

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: Vaishnavi J [/O=THEFACEBOOK/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN= [REDACTED]]
Sent: 3/23/2021 11:09:04 PM
To: [REDACTED]; Vaishnavi J [REDACTED]; [REDACTED]; [REDACTED]
Subject: Message summary [{"otherUserFbId":null,"threadFbId":5369084769798578}]

[REDACTED] (3/23/2021 00:32:23 PDT):

>Hi both - one of the things some of our partners have been asking for (in PH in particular) is in-app reporting for underage accounts. Is this something that we can consider? Adding u/age tag to in-app reporting flow on at least profiles/accounts?

Vaishnavi Jayakumar (3/23/2021 06:47:44 PDT):

>Hey hey! I think there's appetite for this but would be a significant legal / privacy lift. That said considering how we're heading towards youth experiences, definitely not off the table. How much of a push are you getting / how much of a priority would you rate it?

[REDACTED] (3/23/2021 07:37:52 PDT):

>Hmm mainly in one country but if it's a big lift I'm uncertain... I'm not sure if people will use it. I mean, if they did, it would be great cos it will give us signal on u/13 accounts we could use later for other efforts... but how do we know how much it will be used without trying it?

[REDACTED] (3/23/2021 10:57:27 PDT):

>As part of the Age Verification workstream for Youth XFN, we are working on improving our underage reporting flows and backlog. It is a longer term project though (clearing the backlog is the immediate concern right now)

[REDACTED] (3/23/2021 10:59:18 PDT):

>I can check with PM leading this to see if there's an overall underage reporting flow improvement plan coming together

[REDACTED] (3/23/2021 15:01:28 PDT):

>Improving u13 reporting is clearly prioritized in the Youth XFN roadmap: U13 Reporting and Enforcement (P1)* Significantly improve Reporting & Enforcement for users under 13 years old across FB & IG to ensure compliance with our terms of use guidance and to build legitimacy with external stakeholders [POC: [REDACTED]]

>Data point: For reporting, currently, there is no way for users to report U-13 users on Facebook in app and takes over 7 screens for users to report U-13 users on IG. See here (https://docs.google.com/presentation/d/1WbJQ8Uqc9jb1KmOQcZx2NsG0tCda8WFDy-q4aNiaNgI/edit#slide=id.gbba804680c_0_296) for reference. On enforcement, we currently have a backlog of over 2.5 million cases age-related reports to review.

- >1. [P0] Review submissions within 48 hour turnaround for U-13 review and appeals. Includes backlog clean up.
- >2. [P1] Facebook: Launch a 4 screen in app U-13 reporting flow globally.
- >3. [P1] Instagram: Shorten in app U-13 Reporting Flow from 7 to 5 screens.

[REDACTED] (3/23/2021 16:09:04 PDT):

>Oh wow. It would be really interesting to know which countries the backlog represents and in what proportion...

DOCUMENT SLIPSHEET

Bates Number: META3047MDL-020-00278850

BEGATTACH: META3047MDL-020-00278850

ENDATTACH: META3047MDL-020-00278850

TNAG BEGBATES: METATNAG-005-00409002

TNAG ENDBATES: METATNAG-005-00409002

Create Date: 3/23/2021 12:00 AM

Last Modified Date: 3/23/2021 12:00 AM

Custodian: [REDACTED]; JAYAKUMAR_VAISHNAVI

Title:

Author:

Confidentiality Designation: HIGHLY CONFIDENTIAL (COMPETITOR)

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