

AMENDED Exhibit 235

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=[REDACTED]
Sent: 1/27/2024 12:46:02 AM
To: [REDACTED]
Subject: Message summary [{"otherUserFbld":100021478472088,"threadFbld":null}]
Attachments: 421145203_3476210946022285_5996447925158648346_n.png

[REDACTED] (1/26/2024 13:25:30 PST):

>[REDACTED]'s qual would have been a lot more impactful if she had a better understanding of the platform, the youth prev reduction workstream, and the central decisions that the work could inform. We need to make sure that all of our research is oriented in what is actually happening at the company. It's super inefficient when we don't. Not useless, but not maximizing our impact.

[REDACTED] (1/26/2024 13:27:51 PST):

>Stuff like MYST is so far away from the product teams it is destined to be tangential to product impact, you need to reinforce to the team that it is their job to know what is happening on our platforms and across the company.

[REDACTED] (1/26/2024 13:28:14 PST):

>[REDACTED] and [REDACTED] need to build relationships on XI and FI

[REDACTED] (1/26/2024 13:29:09 PST):

>and honestly, on SI. There is still no meaningful engagement from YWB -> SI-X, and it's a huge gap in their understanding.

[REDACTED] (1/26/2024 13:30:10 PST):

>[REDACTED] reached out on baseline protections because she understands this, so props to her. She has grown a lot in the last 18 months.

[REDACTED] (1/26/2024 13:32:46 PST):

>why are [REDACTED] and [REDACTED] are not tying the threads?

[REDACTED] (1/26/2024 13:33:06 PST):

>because that's not what the PM function does

[REDACTED] (1/26/2024 13:33:12 PST):

>they need to though

[REDACTED] (1/26/2024 13:33:20 PST):

>no, WE need to

[REDACTED] (1/26/2024 13:33:20 PST):

>they cannot operate in their little microverses

[REDACTED] (1/26/2024 13:33:27 PST):

>tell your reports!

[REDACTED] (1/26/2024 13:33:27 PST):

>oh yeah we need to as well

[REDACTED] (1/26/2024 13:33:29 PST):

>i need to

[REDACTED] (1/26/2024 13:33:33 PST):

>I am!

[REDACTED] (1/26/2024 13:33:42 PST):

>not today. today is HR freak out day for me

[REDACTED] (1/26/2024 13:33:56 PST):

>dealing with bunch of nonsense fml

[REDACTED] (1/26/2024 13:37:28 PST):

>[REDACTED] slightly misspoke about an appearance comparison finding yesterday, and [REDACTED] tried to correct but was not clear enough... and it seems to have created a minor issue. I'm not telling them yet, I'll just sort it out because it's not worth their time, but I need you to coach people on how to present data efficiently and very accurately

[REDACTED] (1/26/2024 13:37:53 PST):

>you and [REDACTED] are strongest in data communication in the team

[REDACTED] (1/26/2024 13:38:04 PST):
>what'd she say

[REDACTED] (1/26/2024 13:38:08 PST):
>and why is it an HR problem

[REDACTED] (1/26/2024 13:38:14 PST):
>oh that is not the HR problem

[REDACTED] (1/26/2024 13:38:19 PST):
>ahh

[REDACTED] (1/26/2024 13:38:21 PST):
>what'd she say

[REDACTED] (1/26/2024 13:38:21 PST):
>HR problem is something i can't share

[REDACTED] (1/26/2024 13:38:57 PST):
>she said teens are getting exposed to apperance comparison content almost exclusively through recommendations vs organic

[REDACTED] (1/26/2024 13:39:06 PST):
>lol

[REDACTED] (1/26/2024 13:39:10 PST):
>that's not slightly misspeaking

[REDACTED] (1/26/2024 13:39:22 PST):
>what a strange thing to say

[REDACTED] (1/26/2024 13:39:28 PST):
>what she meant to say was when people provided examples of apperance comparison content, the examples came from recommendations vs organic

[REDACTED] (1/26/2024 13:39:37 PST):
>because they had that chart in the appendix

[REDACTED] (1/26/2024 13:39:46 PST):
>oh she was describing her own research?

[REDACTED] (1/26/2024 13:39:50 PST):
>yes

[REDACTED] (1/26/2024 13:39:54 PST):
>the diary study

[REDACTED] (1/26/2024 13:40:00 PST):
>ehh I mean within context that's not so bad

[REDACTED] (1/26/2024 13:40:03 PST):
>which cannot state that

[REDACTED] (1/26/2024 13:40:09 PST):
>if she'd just out and out said it that would've been very bad

[REDACTED] (1/26/2024 13:40:16 PST):
>no it's bad because people automatically interpreted it as prevalence

[REDACTED] (1/26/2024 13:40:17 PST):
>yes but there is presumptive context when presenting a deck

[REDACTED] (1/26/2024 13:40:41 PST):
>and then [REDACTED] was like "no no, this is not prevalence" but in 43290 words

[REDACTED] (1/26/2024 13:41:00 PST):
>and then [REDACTED] was like "yeah because this is qualitative data and not generalizable"...

[REDACTED] (1/26/2024 13:48:20 PST):
>kk

[REDACTED] (1/26/2024 13:48:25 PST):
>yeah they should work on that

[REDACTED] (1/26/2024 13:48:45 PST):
>[REDACTED] has always struggled with concision, [REDACTED] is usually pretty good on this bad that's a miss

[REDACTED] (1/26/2024 13:49:04 PST):
>but*

[REDACTED] (1/26/2024 13:49:30 PST):
>who was the audience?

[REDACTED] (1/26/2024 13:49:55 PST):
>I would assume any reasonable product folk would be able to navigate that just fine

[REDACTED] (1/26/2024 13:50:00 PST):
>CSI leads

[REDACTED] (1/26/2024 13:50:08 PST):
>[REDACTED], [REDACTED] etc etc

[REDACTED] (1/26/2024 13:50:12 PST):
>someone from policy

[REDACTED] (1/26/2024 13:50:18 PST):
>[REDACTED] was there.

[REDACTED] (1/26/2024 13:50:27 PST):
>ehh i'm not enthusiastic about this pathway, gotta stop using ICs for pet projects

[REDACTED] (1/26/2024 13:50:33 PST):
>[REDACTED] too I think.

[REDACTED] (1/26/2024 13:50:35 PST):
>they haven't even presented to FI PM

[REDACTED] (1/26/2024 13:50:41 PST):
>they signed up themselves!

[REDACTED] (1/26/2024 13:50:49 PST):
>they see the incentives on the wall

[REDACTED] (1/26/2024 13:51:09 PST):
>it's crazy to me that they're not presenting to the team that is midflight in deciding how to treat this content

[REDACTED] (1/26/2024 13:51:14 PST):
>to be fair, [REDACTED] and [REDACTED] read the deck end to end and it's getting traction

[REDACTED] (1/26/2024 13:51:17 PST):
>classic central team silo

[REDACTED] (1/26/2024 13:51:23 PST):
>yeah, they should.

[REDACTED] (1/26/2024 13:51:41 PST):
>before they talk to FI we need to make sure they are not misspeaking about the data though

[REDACTED] (1/26/2024 13:52:50 PST):
>ehh, FI would be fine because they're product people

[REDACTED] (1/26/2024 13:53:01 PST):
>[REDACTED] is harder, need to spoonfeed them

[REDACTED] (1/26/2024 13:53:22 PST):
>FI PM would be like "do you mean this or this" until it's absolutely clear

[REDACTED] (1/26/2024 13:53:43 PST):
>every time I present to them they grill me on specifics, it's great

[REDACTED] (1/26/2024 13:54:19 PST):
>half the time that's where my next couple weeks go following up on useful stuff, whereas you see the SI-X leads comments on [REDACTED]'s deck and it's like... randomizing nonsense

[REDACTED] (1/26/2024 13:56:04 PST):
>the FI collab on youth is going very strongly, need to get YWB to align with what our org is actually doing that is impactful

[REDACTED] (1/26/2024 13:56:04 PST):
shared: 421145203_3476210946022285_5996447925158648346_n.png

[REDACTED] (1/26/2024 13:56:30 PST):

>yeah, of course a more analytically literal xfn group would be fine-r but we still need to be very accurate in presenting data.

[REDACTED] (1/26/2024 13:56:33 PST):
>and concise

[REDACTED] (1/26/2024 13:56:38 PST):
>no room for misinterpretation

[REDACTED] (1/26/2024 13:56:53 PST):
>I would rather land impact than take no risks

[REDACTED] (1/26/2024 13:56:57 PST):
>ET PM would grill and understand.
>[REDACTED] would go and tell [REDACTED] I'm incompetent

[REDACTED] (1/26/2024 13:57:02 PST):
>I know [REDACTED] disagrees because he said it to me directly

[REDACTED] (1/26/2024 13:57:12 PST):
>[REDACTED] is gone because nobody cares what she thinks

[REDACTED] (1/26/2024 13:57:18 PST):
>[REDACTED] is the lead now, and is a close ally

[REDACTED] (1/26/2024 13:57:37 PST):
>I want to take smart risks.
>So i rather coach them on conciseness

[REDACTED] (1/26/2024 13:57:43 PST):
>also because it's my job

[REDACTED] (1/26/2024 13:57:59 PST):
>It is much less important that they land impact

[REDACTED] (1/26/2024 13:58:14 PST):
>it is much more important that they orient themselves to land impact

[REDACTED] (1/26/2024 13:58:24 PST):
>these niggly little things and giant caveat slides are just background noise

[REDACTED] (1/26/2024 13:58:46 PST):
>just depried crisis for UXR. tooth and nail.

[REDACTED] (1/26/2024 13:59:16 PST):
>(Y) it's a start, we need to de-pri it for SI-X, but it's part of [REDACTED] portfolio and he cares more about that than what makes sense as org strategy

[REDACTED] (1/26/2024 13:59:31 PST):
>I really don't care that team is super passionate about this. i'm not allocating half of [REDACTED]'s time on something where there is 1 engineer.

[REDACTED] (1/26/2024 13:59:39 PST):
>(Y)

[REDACTED] (1/26/2024 13:59:46 PST):
>[REDACTED] needs a focus area

[REDACTED] (1/26/2024 13:59:48 PST):
>misinfo is free

[REDACTED] (1/26/2024 14:00:00 PST):
>she is too horizontal atm, no path to 6 that way

[REDACTED] (1/26/2024 14:00:06 PST):
>I'm thinking 50% misinfo, 50% [REDACTED] backfill

[REDACTED] (1/26/2024 14:00:15 PST):
>ehh [REDACTED] was doing fairly random stuff

[REDACTED] (1/26/2024 14:00:40 PST):
>There is a neat product efficacy measurement project [REDACTED] should do. and maybe also help [REDACTED] with floor of protections

[REDACTED] (1/26/2024 14:00:54 PST):
>floor of protections is random enough as it is

[REDACTED] (1/26/2024 14:01:01 PST):

>maybe also look at problematic use thresholds

(1/26/2024 14:01:03 PST):

>what is product efficacy measurement, just evaluating things?

(1/26/2024 14:01:10 PST):

>PU is pretty dead in the water

(1/26/2024 14:01:15 PST):

>isn't [REDACTED] already on it?

(1/26/2024 14:01:26 PST):

>[REDACTED] needs to be out of it she is burnt

(1/26/2024 14:01:36 PST):

>fair

(1/26/2024 14:01:39 PST):

>for PU the question is when / if it is effective and how we trigger

(1/26/2024 14:01:47 PST):

>it's not effective, it's not meant to be

(1/26/2024 14:01:55 PST):

>it's a PR product and that's fine but shouldn't be staffed

(1/26/2024 14:01:58 PST):

>efficacy: does anything we do help... in anything.

(1/26/2024 14:02:06 PST):

>too broad

(1/26/2024 14:02:06 PST):

>I'm starting to think the same tbh

(1/26/2024 14:02:44 PST):

>I'm over problematic use, just that it's in every single legislation

(1/26/2024 14:02:49 PST):

>start with the outcome we want to move, evaluating products only makes sense if there's an actual implicit goal

(1/26/2024 14:02:59 PST):

>the legislation says stop optimizing for vpvs

(1/26/2024 14:03:07 PST):

>yah

(1/26/2024 14:03:08 PST):

>that's where the juicy work is

(1/26/2024 14:03:13 PST):

>what is an alternative to our current topline

(1/26/2024 14:04:00 PST):

>in a review we were in last week [REDACTED] said she needed research to see what features are optimizing for time spent. i wanted to bury myself somewhere.

(1/26/2024 14:04:05 PST):

>it's like.... yes.

(1/26/2024 14:04:20 PST):

>collating org goals is a good project

(1/26/2024 14:04:27 PST):

>what do you mean?

(1/26/2024 14:04:28 PST):

>tell me more

(1/26/2024 14:04:35 PST):

>get each surface team's goal outcome that they're optimizing for, put in doc

(1/26/2024 14:04:55 PST):

>like GYSJ optimizes for group joins, feed relevance optimizes for vpvs, IG feed optimizes for sessions

(1/26/2024 14:05:00 PST):

>gotta meet [REDACTED] now. but is that not a [REDACTED] project?

██████████ (1/26/2024 14:05:03 PST):
>to my knowledge this is not consolidated

██████████ (1/26/2024 14:05:09 PST):
>does ██████████ do projects?

██████████ (1/26/2024 14:05:15 PST):
>idk does he not?

██████████ (1/26/2024 14:05:23 PST):
>he could do it, but someone has to

██████████ (1/26/2024 14:05:30 PST):
>it's not hard, but it is important

██████████ (1/26/2024 14:05:51 PST):
>good starting point for "what do we optimize for; is it defensible to do so for teens; what should we optimize for"

██████████ (1/26/2024 14:06:14 PST):
>came up in the product policy VP / XI discussion around youth, ██████████ is probably the one pushing it to diana

██████████ (1/26/2024 16:10:35 PST):
>seems more promising than whatever ██████████ roadmap is... they simply cannot do another half of finding themselves

██████████ (1/26/2024 16:10:42 PST):
>this would be the what, 4th in a row?

██████████ (1/26/2024 16:29:31 PST):
>4th year

██████████ (1/26/2024 16:37:47 PST):
>They should audit every surface team's goal across the company, think about whether we would be comfortable telling the world that we are optimizing for x for their kid, and when the answer is no, come up with a defensible alternative.

██████████ (1/26/2024 16:37:54 PST):
>Do they still have too many PD?

██████████ (1/26/2024 16:38:18 PST):
>Too many and they can't work with ig without fighting

██████████ (1/26/2024 16:38:37 PST):
>that's fine, keep them busy fighting IG while they audit the company's goals

██████████ (1/26/2024 16:38:53 PST):
>imagine going out in public and telling people we rank their kid's facebook by what makes them consume the most content IDs lol

██████████ (1/26/2024 16:39:01 PST):
>this will be a public conversation and we are not ready for it

██████████ (1/26/2024 16:39:35 PST):
>and then when they hear what things keep their kid consuming the most content IDs -- sorting their feed by controversial, eye-popping filth -- we're off to the races on a really fun conversation

██████████ (1/26/2024 16:40:06 PST):
>if ██████████ is on paper supportive of this, we should seize the day and fund it

██████████ (1/26/2024 16:40:29 PST):
>She is
>But she is also quite uninformed

██████████ (1/26/2024 16:40:42 PST):
>I'm not ready for the weekend ██████████ ☹️

██████████ (1/26/2024 16:40:54 PST):
>then a click deeper, do the same with each value model term... like should we rank your kid's feed by.... p(like)-yes; p(most comments read)-no

██████████ (1/26/2024 16:41:09 PST):
>this would be a really cool research project

██████████ (1/26/2024 16:41:27 PST):
>Welll... Maybe yes on p most comments read if the comments are decent

[REDACTED] (1/26/2024 16:41:40 PST):
>they never are

[REDACTED] (1/26/2024 16:41:47 PST):
>comments are the worst part of facebook and everyone knows it

[REDACTED] (1/26/2024 16:42:04 PST):
>yet that's what we're optimizing for because people can't help but watch people fighting

[REDACTED] (1/26/2024 16:42:10 PST):
>IG?

[REDACTED] (1/26/2024 16:42:13 PST):
>it's the same thing with the car crash videos kids are seeing, humans naturally look

[REDACTED] (1/26/2024 16:42:17 PST):
>IG comments are also awful

[REDACTED] (1/26/2024 16:42:23 PST):
>because their UI is asymmetrical

[REDACTED] (1/26/2024 16:42:46 PST):
>the negative feedback option on IG comments is genuinely invisible

[REDACTED] (1/26/2024 16:42:57 PST):
>Yeah

[REDACTED] (1/26/2024 16:45:13 PST):
>^^ this is a much stronger path to impact than anything else on [REDACTED]'s roadmap

[REDACTED] (1/26/2024 16:45:15 PST):
>make someone do it

[REDACTED] (1/26/2024 16:45:42 PST):
>[REDACTED]?

[REDACTED] (1/26/2024 16:45:50 PST):
>she could do it

[REDACTED] (1/26/2024 16:46:01 PST):
>depends if there are serious measurement needs or not

[REDACTED] (1/26/2024 16:46:02 PST):
>ok I'm brain dead