

AMENDED Exhibit 238

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: 4/9/2021 5:22:16 PM
To: Vaishnavi J [REDACTED]; [REDACTED]
Subject: Message summary [{"otherUserFbId":100033644625841,"threadFbId":null}]

[REDACTED] (4/09/2021 09:58:39 PDT):
 >Your hair looks incredible today.

Vaishnavi Jayakumar (4/09/2021 10:00:04 PDT):
 >Thank you! It's in that sweet spot of 2nd day after washing ☺

[REDACTED] (4/09/2021 10:03:45 PDT):
 >Would we consider not surfacing certain content in our rec surfaces that we know to be triggering?

[REDACTED] (4/09/2021 10:04:05 PDT):
 >The way that we've identified borderline harmful in other categories

Vaishnavi Jayakumar (4/09/2021 10:04:15 PDT):
 >Totally - we're working on a borderline ED policy right now to address this and are just kicking that off

[REDACTED] (4/09/2021 10:04:22 PDT):
 >Exactly

Vaishnavi Jayakumar (4/09/2021 10:05:19 PDT):
 >We had a first round of brainstorming this week that was really interesting - bucketing potential types of behaviours into borderline / not-borderline

[REDACTED] (4/09/2021 10:06:03 PDT):
 >The images that [REDACTED] sent yesterday of an explore feed is really problematic, and the ownership of that is also on us since it's an unconnected, recommended surface.

Vaishnavi Jayakumar (4/09/2021 10:07:21 PDT):
 >Yeah - the challenge is that when you zoom in, any one of those photos probably wouldn't be triggering. But in an explore grid with all these photos stacked against one another, it's pretty overwhelming

Vaishnavi Jayakumar (4/09/2021 10:10:11 PDT):
 >This discussion of IG profile personhood seems delightfully conceptual - I'm very into it

Vaishnavi Jayakumar (4/09/2021 10:10:16 PDT):
 >Like Citizens United but in 60 seconds

[REDACTED] (4/09/2021 10:11:36 PDT):
 >Right. That is actually where I think we should be focused as well. We want to be mindful that even calling the content borderline is sensitive. I could argue that some of the content I consume, either from fitness accounts, but also from Indian dance accounts, could be sensitive on the per post level. But the problem is in aggregate. If we believe that a social media diet that consumes "healthy" content is what we recommend, we should build out Explore feeds that provide diverse content, still custom and ranked, but using broader signals perhaps/

[REDACTED] (4/09/2021 10:12:45 PDT):
 >Also, all of this is good tooling for when we build out IG Youth.

Vaishnavi Jayakumar (4/09/2021 10:12:51 PDT):
 >Oh yeah definitely

[REDACTED] (4/09/2021 10:13:49 PDT):
 >Girls as young as 8 start to lose self-confidence b/c of negative self image and social comparison. It's when they become aware of their bodies vs. others.

Vaishnavi Jayakumar (4/09/2021 10:14:30 PDT):
 >Yeah and we're playing the same role today in their perception of self-identity that magazines and music videos played when we were growing up

[REDACTED] (4/09/2021 10:14:41 PDT):
 >Exactly

Vaishnavi Jayakumar (4/09/2021 10:14:59 PDT):

>And we all know how much those visuals impacted how we saw ourselves - I wanted to have pin straight long hair and hated my curls

[REDACTED] (4/09/2021 10:15:40 PDT):

>That's exactly right. And the problem i had with the intervention proposal is that the magazines had to take more ownership of what they showed in their mags knowing that young girls were the biggest consumers of their publication.

[REDACTED] (4/09/2021 10:16:33 PDT):

>Also, one leverages user data in a way that I want us to think through holistically. It's invasive, in many ways, to know that we're analyzing the content you consumer and recommend something else. Outside of narrowly defined harmful content streams.

[REDACTED] (4/09/2021 10:16:49 PDT):

>But i'm going to wait till i finish reading the thread

[REDACTED] (4/09/2021 10:17:14 PDT):

>sorry the deck and the thread. I have a few lawyer friends that advocate on these issues and have talked to them in the past about social media's role

Vaishnavi Jayakumar (4/09/2021 10:18:03 PDT):

>That's great - totally recognise that these are very significant shifts from a product intervention perspective, which is why we want to start collecting feedback early and frequently. Also want to take this to some external advisors on the topic

[REDACTED] (4/09/2021 10:18:09 PDT):

>there are really meaty legal issues separate and apart of the policy and public health concerns. Largely by way of deceptiveness (which I think is something we should start to leverage more)

Vaishnavi Jayakumar (4/09/2021 10:18:28 PDT):

>I'm going to talk to karina about bringing in the team to one of our policy coffee hours to spend more time going into this work in depth

[REDACTED] (4/09/2021 10:20:12 PDT):

>Who is [REDACTED]?

Vaishnavi Jayakumar (4/09/2021 10:22:16 PDT):

>He's an engineer on the interactions integrity team - he does a good amount of work on SSI

DOCUMENT SLIPSHEET

Bates Number: META3047MDL-040-00541685-META3047MDL-040-00541686

BEGATTACH: META3047MDL-040-00541685

ENDATTACH: META3047MDL-040-00541686

TNAG BEGBATES:

TNAG ENDBATES:

Create Date: 4/9/2021 10:22 AM

Last Modified Date: 4/9/2021 10:22 AM

Custodian: JAYAKUMAR_VAISHNAVI

Title:

Author:

Confidentiality Designation: HIGHLY CONFIDENTIAL (COMPETITOR)

META Pointer:

META Pointee: