

AMENDED Exhibit 244

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

>I think there are 2 questions – one, knowing we're going to get it wrong, should we tweak this language. Second, why did we get this wrong

██████████ (3/30/2020 09:34:29 PDT):

>the FB team changed their header to "We couldn't prioritize your report" because of NetzDG, and ██████████ and i discussed making the same change last week. not sure if that would solve this, though, because we'd still be saying we didn't think this content was problematic

Karina Lynn Newton (3/30/2020 09:35:42 PDT):

>Did they make the change only for Germany?

██████████ (3/30/2020 09:35:58 PDT):

>across all flows

██████████ (3/30/2020 09:39:03 PDT):

>If you report potential CEI, this wouldn't solve the problem from my point of view. No one who reports CEI should see a msg that we couldn't prioritize it.

Karina Lynn Newton (3/30/2020 09:40:31 PDT):

>Yes, we need to debug but I do think it softens the blow. I wonder also if we should suggest language to re-report if you think we got it wrong at a precision where we're unsure – ██████████ will start a focused thread

Vaishnavi Jayakumar (3/30/2020 09:40:49 PDT):

>If CEI is determined by classifiers, not the queue it's reported in, then it seems we'd always have this issue. During this time where we're only reviewing the most severe harms, have we considered specific reporting flows for those harms?

██████████ (3/30/2020 09:41:08 PDT):

>We don't have an in-app reporting option for CEI that I'm aware of

Vaishnavi Jayakumar (3/30/2020 09:41:12 PDT):

>(I'm sure that's harder than it sounds but still wondering ☺)

Karina Lynn Newton (3/30/2020 09:41:24 PDT):

>We do not

Vaishnavi Jayakumar (3/30/2020 09:42:50 PDT):

>I can understand that there are usually concerns (legal / reputational) around displaying these reporting options, but we could offer those flows temporarily as a response to covid

██████████ (3/30/2020 09:43:43 PDT):

>I don't think updating our reporting flow options is minimal product work and I'd be concerned that people would abuse this reporting option to report anything they want reviewed, and we'd need to review it because it's been reported as CEI

██████████ (3/30/2020 09:44:23 PDT):

>I also thought of that, but we would need to explain why it disappears again after covid times

██████████ (3/30/2020 09:44:27 PDT):

>if it's reported again and we use the same classifiers to determine whether it's CEI or not, would they probably just get another ignore/auto-close?

██████████ (3/30/2020 09:45:06 PDT):

>I think the best option here is 1) understand why the content was ignored; 2) if re-reported, it should not be ignored again – and we should confirm that is working properly; 3) evaluate whether to soften the auto reject language header (which I think we're doing anyway)

██████████ (3/30/2020 09:47:21 PDT):

>Softening the header to a simple 'Thank you for your report' – and we keep the language already in the pop up which covers the constraint but we say 'the most potential harm' so the reporter would assume their report was being reviewed? I'm not sure I understand why we would be asking a reporter to report CEI twice?

██████████ (3/30/2020 09:47:40 PDT):

>maybe I'm not understanding it ☐

Vaishnavi Jayakumar (3/30/2020 09:50:00 PDT):

>If reports are being categorised using classifiers, I'm not sure that re-reporting the content is going to change that. The best option is one where our classifier just doesn't get it wrong, but where it does, re-reporting may not help.

██████████ (3/30/2020 09:51:27 PDT):

>and what if re-reporting would lead to manual review? Or would that still lead to a too high workload for the few reviewers still out there?

Vaishnavi Jayakumar (3/30/2020 09:53:07 PDT):

>That'd be great but I think the workload would indeed be too high

██████████ (3/30/2020 09:53:20 PDT):

>this could be misleading because people will expect to eventually get an update on their report

Vaishnavi Jayakumar (3/30/2020 09:54:24 PDT):

>what do we send back now to reporters when their report accurately flags CEI?

Karina Lynn Newton (3/30/2020 10:01:49 PDT):

>We don't differentiate close the loop language for reporting type. If someone reports it again, it overrules our classifiers under normal circumstances.

Vaishnavi Jayakumar (3/30/2020 10:06:32 PDT):

>That's perfect - if the classifiers are still being overruled by re-reporting in this situation, it would go to manual review and presumably we have enough people to review the content?

Vaishnavi Jayakumar (3/30/2020 10:16:19 PDT):

>Following up on this - was just playing with the FB app and it looks like we do have the option to report CEI there, so doing it on IG (aside from what I'm sure would be significant product life) would not be unexpected.

Vaishnavi Jayakumar (3/30/2020 10:16:33 PDT):

>*lift not life :/



We couldn't review your report.

We have fewer people available to review reports because of the coronavirus (COVID-19) pandemic, so we're only able to review content with the most potential for harm. If you don't want to see amyloves0916 on Instagram, you can unfollow, mute or block them to hide their posts and comments from your feed. Reports like yours are an important part of making Instagram a safe and welcoming place for everyone.

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DOCUMENT SLIPSHEET

Bates Number: META3047MDL-050-00285734-META3047MDL-050-00285736

BEGATTACH: META3047MDL-050-00285734

ENDATTACH: META3047MDL-050-00285737

TNAG BEGBATES:

TNAG ENDBATES:

Create Date: 3/30/2020 10:16 AM

Last Modified Date: 3/30/2020 10:16 AM

Custodian: JAYAKUMAR_VAISHNAVI; NEWTON_KARINA

Title:

Author:

Confidentiality Designation: HIGHLY CONFIDENTIAL (COMPETITOR)

META Pointer:

META Pointee: