

AMENDED Exhibit 276

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: 10/11/2021 6:02:07 PM
To: [REDACTED]; Miki Rothschild; Sayed Otaru; [REDACTED]
Subject: Message summary [{"otherUserFbld":null,"threadFbld":4921708494509406}]

Michael Yehuda Rothschild (10/11/2021 09:59:55 PDT):

>Adding [REDACTED] for vis in case he has insight

[REDACTED] (10/11/2021 10:04:31 PDT):

>It's not a mistake. It's intentional, by design, but from an out-dated set of requirements.

[REDACTED] (10/11/2021 10:04:43 PDT):

>Specifically, in the past, the only requirement for age-gating on IG was by advertisers, around brand safety.

[REDACTED] (10/11/2021 10:05:06 PDT):

>That's why the relevant infra and code are owned by the IG Ads team ("IG4B") as opposed to Well-being. We never used that infra for Integrity. I don't even know how reliable it is.

[REDACTED] (10/11/2021 10:05:31 PDT):

>So whoever wants to start using it for Integrity should chat with IG4B, see what gaps there are, etc.

[REDACTED] (10/11/2021 10:06:18 PDT):

>Not opposed to enhancing it, just sharing that it was never designed or used for Integrity purposes in the past.

[REDACTED] (10/11/2021 10:09:43 PDT):

>Couple of things given current news cycle

>1/ Should we give Adam, policy, legal, comms a heads up

>2/ Should we file a sev and track it

[REDACTED] (10/11/2021 10:10:10 PDT):

>For #1 - @Miki @ [REDACTED] it makes sense for the heads up to come from IGWB

[REDACTED] (10/11/2021 10:11:07 PDT):

>Sure, why not? Can't hurt. But curious who made the assumption that this infra can be used for Integrity purposes, and who would fix the SEV?

[REDACTED] (10/11/2021 10:11:25 PDT):

>It sounds like some folx just assumed age-gating would work for Integrity, when it was never planned to.

[REDACTED] (10/11/2021 10:12:14 PDT):

>It sounds like "we had some wishful thinking, found out it's wrong, so now we're filing a SEV to force someone else to fix it fast" :) None of this is a criticism, I'm probably missing something. Mostly just curious.

[REDACTED] (10/11/2021 10:12:17 PDT):

>i think that's a fair point. The more important point is that this gap doesn't seem to be well known.

[REDACTED] (10/11/2021 10:12:42 PDT):

>we can give the heads up and then decide if it should be a sev?

[REDACTED] (10/11/2021 10:12:54 PDT):

>Sure. Can someone write it including what depends on it?

[REDACTED] (10/11/2021 10:13:05 PDT):

>It wasn't a "gap" until now because nothing depended on it or tried to use it (outside the well-known Ads use-cases).

[REDACTED] (10/11/2021 10:13:18 PDT):

> [REDACTED] can you frame the email for Miki and Yoav to take a look

Yoav Shapira (10/11/2021 10:13:20 PDT):

>I imagine some new functionality depends on this now?

[REDACTED] (10/11/2021 10:44:21 PDT):

>we may be violating some policies without it

[REDACTED] (10/11/2021 10:45:19 PDT):

>This has been part of policy for years (pre CI taking on IG directly, even), so the better question may be why IGWB never built this

[REDACTED] (10/11/2021 10:45:39 PDT):

>There may have been good policy conversations that happened about it historically but I don't have the context.

[REDACTED] (10/11/2021 10:46:01 PDT):

>It's never been brought up even once, as far as I know.

[REDACTED] (10/11/2021 10:46:12 PDT):

>But to be clear we are not trying to build any new functionality here

[REDACTED] (10/11/2021 10:46:17 PDT):

>This is literally the first time I hear about this infra being used for Integrity purposes, even in theory, since I've worked in the domain (2018).

[REDACTED] (10/11/2021 10:46:34 PDT):

>IGWB handed this off to Ads years ago because we weren't using it at all, much less building it.

[REDACTED] (10/11/2021 10:47:30 PDT):

>Can we separate the infra from the policy compliance problem? I don't know if the original intent was to use this infra specifically or what, but it's clear that something was overlooked here years ago, possibly before all of our time

[REDACTED] (10/11/2021 10:47:45 PDT):

>[Sorry for maybe dup message, messages is flaky for me right no]

>

>The gap is external community standards pages mentioning we age gate but not implemented in IG product. Found this via action->UX audit. <https://transparency.fb.com/policies/community-standards/violent-graphic-content/>

[REDACTED] (10/11/2021 10:48:09 PDT):

>Sure.

[REDACTED] (10/11/2021 10:48:17 PDT):

>Yup, understood, not contested.

[REDACTED] (10/11/2021 10:48:34 PDT):

>Y'all know we don't even have age on IG for a big chunk (last figure I saw was ~30%) of IG users, right?

[REDACTED] (10/11/2021 10:49:05 PDT):

>There's a bunch of work, spurred on by the Youth work, that is helping improve coverage, but we didn't even ask any IG users for age until a few months ago.

[REDACTED] (10/11/2021 10:49:17 PDT):

>I wonder if the authors of those web pages know that?

[REDACTED] (10/11/2021 10:49:32 PDT):

>I saw that age verification is a push. At the very least, we should implement published behaviors whenever we do have the age.

[REDACTED] (10/11/2021 10:50:58 PDT):

>Sure, and that's a good future. I just wonder how the pages above came to be, because I'd like to fix *that* underlying misunderstanding.

[REDACTED] (10/11/2021 10:53:27 PDT):

>Put another way: I think Adam knows what this infra is used for, or not. A heads-up to Adam is OK (I don't mind, please write it as you see fit...), but it won't be news to him, as much as it's news to others.

[REDACTED] (10/11/2021 10:54:52 PDT):

>Is there already a process that is prioritizing the open risks on IG youth that this can get plugged into for a more global prioritization?

[REDACTED] (10/11/2021 10:55:07 PDT):

>^^

[REDACTED] (10/11/2021 11:00:51 PDT):

>This is a new issue that was raised only recently, as the teams highlighted when they were trying to build for the IGY product. I have a kickoff meeting tomorrow with several teams to get to ground truth on what we are and we are not age gating on IG, and begin scoping/workstreams/etc... I can work with the Youth Initiative to prioritize. As Yoav mentioned, our POs related to age this half has been to increase our stated age collection, improve coverage for age models, and build age verification methods to improve age accuracy.

[REDACTED] (10/11/2021 11:02:07 PDT):

>Just sent email highlighting with high level info on this. Everyone here is included.