

AMENDED Exhibit 278

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: Susan Li [/O=THEFACEBOOK/OU=EXTERNAL (FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN= [REDACTED]]
Sent: 11/14/2021 1:36:47 PM
To: Naomi Gleit [REDACTED]; Nick Clegg [REDACTED]; Mark Zuckerberg [REDACTED]
CC: Chris Cox [REDACTED]; Alex Schultz [REDACTED]; Pratiti Raychoudhury [REDACTED]; Kang-Xing Jin [REDACTED]; Sheryl Sandberg [REDACTED]; Joel Kaplan [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; Antigone Davis [REDACTED]; Lena Pietsch [REDACTED]; Monika Bickert [REDACTED]; David Wehner [REDACTED]; Pavni Diwanji [REDACTED]; Adam Mosseri [REDACTED]
Subject: RE: Well-being product strategy + headcount
Attachments: image001.png; image002.png

I'll defer to Mark on the decision here (and we have a Budget meeting on Monday), but unfortunately XFN heads are running even more constrained than ENG.

From: Naomi Gleit [REDACTED]
Sent: Sunday, November 14, 2021 6:31 AM
To: Nick Clegg [REDACTED]; Mark Zuckerberg [REDACTED]
Cc: Chris Cox [REDACTED]; Alex Schultz [REDACTED]; Pratiti Raychoudhury [REDACTED]; Kang-Xing Jin [REDACTED]; Sheryl Sandberg [REDACTED]; Susan Li [REDACTED]; Joel Kaplan [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; Antigone Davis [REDACTED]; Lena Pietsch [REDACTED]; Monika Bickert [REDACTED]; David Wehner [REDACTED]; Pavni Diwanji [REDACTED]; Adam Mosseri [REDACTED]
Subject: Re: Well-being product strategy + headcount

Mark FWIW this is my #1 "below the line" project to fund on Social Impact (i.e. before Climate.) We've also scaled this request back to ask for XFN only and 0 eng given there are none :)

From: Nick Clegg [REDACTED]
Date: Wednesday, November 10, 2021 at 1:53 AM
To: Mark Zuckerberg [REDACTED]
Cc: Chris Cox [REDACTED]; Alex Schultz [REDACTED]; Pratiti Raychoudhury [REDACTED]; Naomi Gleit [REDACTED]; Kang-Xing Jin [REDACTED]; Sheryl Sandberg [REDACTED]; Susan Li [REDACTED]; Joel Kaplan [REDACTED]; [REDACTED]; [REDACTED]; Antigone Davis [REDACTED]; Lena Pietsch [REDACTED]; Monika Bickert [REDACTED]; David Wehner [REDACTED]; Pavni Diwanji [REDACTED]; Adam Mosseri [REDACTED]
Subject: Well-being product strategy + headcount

Mark,

Circling back re: investment needed to strengthen Meta's position on well-being (see original email from Aug below).

This investment is important to ensure we have the product roadmaps necessary to stand behind our external narrative of well-being on our apps, and soon in the metaverse. This work & narrative has of course become a

more critical focal point for policymakers, regulators et al in recent weeks – this is not likely to diminish going forward.

A number of us have met and agreed upon a revised investment proposal:

1. Agreement on the need to fund a central product team to organize cross-company strategy, execution, and measurement (as per our approach to other societal issues or privacy)
2. Alignment that product work must map to and support our external narrative (as part of Project Beyond)

Funding the central product team remains our biggest gap. Our original 2022 ask from Aug was 25 XFN and 20 ENG to address the roadmap detailed [here](#), which was not funded.

Scaling down, we can make necessary progress in two ways:

1. +25 XFN (and 0 ENG) to form both the central well-being product pod, and 2 topic pods within it to drive focused progress on topics like problematic use and connections. This group would create a cross-Meta well-being strategy, align disparate team roadmaps for well-being topics, and drive necessary measurement for each topic.
2. +7 XFN (and 0 ENG) would form only the central well-being pod, and would focus solely on forming a cross-Meta view of well-being strategy and existing roadmaps and gaps. This would be the bare minimum needed to meet basic policymaker inquiries.

If funded, the team will start by working with existing ENG teams operating in the space ([as of Aug](#), ~90 ENG across Meta - ex RL - disparately working on these topics), ensuring these efforts ladder up to a coherent company strategy.

Given the increased urgency of all this since the initial escalation in August, are you supportive of funding this scaled back proposal?

Thx

N

From: Nick Clegg [REDACTED]>
Date: Friday, August 27, 2021 at 5:30 PM
To: Mark Zuckerberg [REDACTED]>
Cc: Chris Cox [REDACTED]>, Alex Schultz [REDACTED]>, Pratiti Raychoudhury [REDACTED]>, Naomi Gleit [REDACTED]>, Kang-Xing Jin [REDACTED]>, Sheryl Sandberg [REDACTED]>, Susan Li [REDACTED]>, Joel Kaplan [REDACTED]>, [REDACTED] [REDACTED]>, [REDACTED] [REDACTED]>, Antigone Davis [REDACTED]>, Lena Pietsch [REDACTED]>, Monika Bickert [REDACTED]>, David Wehner [REDACTED]>, Pavni Diwanji [REDACTED]>
Subject: Well-being product strategy + tech headcount

Mark

KX, Pratiti and [REDACTED] have put together the proposal below for additional investment to strengthen our position on wellbeing across the company. Chris, Alex and I strongly endorse this approach, and I wanted you to see their thinking ahead of the discussions on headcount allocation.

From a Policy perspective, this work has become increasingly urgent over recent months. Politicians in the US, UK, EU and Australia are publicly and privately expressing concerns about the impact of our products on young people's mental health. In the US, this was specifically raised with me by the Surgeon General, and is the subject of potential legal action from State AGs. We have received [numerous policymaker inquiries and hearing requests](#).

This policy focus - at all levels of government and in multiple jurisdictions - is now being reflected in a greater push for [legislation](#) (eg, body image bills, youth design bills, etc.). It has multiple root causes, including but not limited to:

- Increased concerns about the impact of online tools during Covid-19 -- exacerbated by [increased suicide ideation amongst teens](#) during the pandemic as well as an uptick in actual suicides and other negative mental health outcomes.
- Press and policymaker focus on new product developments like IG Youth.
- Political considerations (eg, efforts to win back "suburban moms" has resulted in Congressional Republicans making youth/kids as a centerpiece of their tech agenda).

We're already seeing that our pivot to the metaverse will raise new questions from policymakers about the impact that our FRL products will have on young people. In a recent US policy elites survey, participants (both Democrats and Republicans) expressed concerns about the potential impacts of AR/VR on young users, particularly with regard to time spent on the devices and the potential for harmful actors to target children.

The good news is we are starting to make real progress internally: We now have a strong program of research underway (led by Pratiti); we have established a Youth XFN (led by Pavni) which is driving some valuable product changes; and we are organizing our comms and marketing efforts in a more streamlined fashion (Lena's narrative disruption team has youth wellbeing as a top priority, and as you know wellbeing is one of our key "Arguments to Win").

Nonetheless, we need to do more and we are being held back by a lack of investment on the product side which means that we're not able to make changes and innovations at the pace required to be responsive to policymaker concerns. Our wellbeing work is both under-staffed and fragmented across teams, which is why we view the proposed investment outlined below as important -- conscious though we all are of the numerous other competing headcount demands.

Nick

Well-being product strategy headcount request:

We are not on track to succeed for our core well-being topics (problematic use, bullying & harassment, connections, and SSI),* and are at increased regulatory risk and external criticism. These affect everyone, especially Youth and Creators; if not addressed, these will follow us into the Metaverse [*Status Quo summary below*].

KX and team developed a product strategy that will get us on track for success over the next ~2 years.

We hope much of the funding can come out of App, Youth, Creators, and Integrity teams, but a few critical

things will likely not:

1) Establishing a central cross-Family team: One of the core gaps right now is each team approaches well-being differently (if at all), and no one owns end-to-end success in each area across all audiences; staffing this is a pre-requisite for company long-term success, and will let us achieve more out of the family of app investments. [25 XFN Headcount]

2) Accelerating work around Problematic Use on FB/IG: This is the topic where we have the largest gap relative to competitors and external expectations as well as minimal current staffing. [20 ENG for FB/IG]

If we want to make meaningful progress, we recommend at a minimum staffing these up for 2022 [See *Options Table below*]. This ask does not cover funding product work specific to AR/VR; however, if we fund the central team, it can work with AR/VR to align on the strategy and approach here as well. For more details, an [overall one-pager for well-being product strategy is here](#).

	Status Quo	Option 1 [Minimum Recommended]	Option 2 [Ideal]
Description	No changes from Status Quo	1) Centralize tracking across all topics, and strategy and measurement for Problematic Use and Connections 2) Staff up Problematic Use product work across FB and IG	1) Centralize tracking, strategy, and measurement across all topics 2) Staff up all identified product gaps across topics in FB, IG, MSGR, WA and Integrity
Incremental Asks		0 25 XFN (Central) + 20 ENG (Product)	40 XFN (Central) + 84 ENG (Product)
What this gets us	Not on path to fully address any topic area; no central ownership	--Central accountability for the 2 topics that are currently wholly un-owned --On path to address Problematic Use challenges (topic where we have largest gap relative to competitors and external expectations, and minimal current staffing) --Not on path to address all 4 topic areas, but may be able to accomplish more, dependent on ability Centrally to influence teams across FoA to prioritize work on these topics (e.g. Youth, Creators, Integrity, AR/VR, FB/IG/MSGR/WA)	--Clear central accountability for all topics --On path to address challenges across all 4 topic areas across FB, IG, MSGR, WA without needing to align prioritization with other teams (excluding AR/VR)

Status Quo		Problematic use	Bullying & Harassment	SSI	Connections
Success		<i>People feel their time on the platform is worthwhile and empowered to manage their experiences.</i>	<i>People feel safer and supported when interacting on our platforms.</i>	<i>People don't associate the company with suicide and self-injury struggles.</i>	<i>People use our products to meaningfully interact with their connections.</i>
Where are we today relative to success	Amplification Proactively prevent and reduce the amplification of problematic aspects of each topic on platform (e.g., ranking, goaling).	Gaps: No guardrails; inconsistency or not available across platforms; not consistently optimized for youth across the company.	Gaps: Better detection of mass harassment/brigading (e.g. Euro 2020 incident); inconsistency across platforms; classifiers not optimized for youth.	Gaps: Regulation; missing borderline/adjacent problematic content; not optimized for youth.	Gaps: Missing high-responsibility investments; inconsistency across platforms; contradictory product investments without clear guardrails.
	Support & resources Provide people with the right tools at the right time to prevent ² and/or navigate <topic> on platform (e.g., controls, reflections).	Gaps: Existing tools neither widely used nor promoted; missing high-responsibility investments; not consistently customized for youth across the company.	Gaps: Improved targeting and timely upselling of existing tools; inconsistency across platforms; not consistently customized for youth across the company. Unclear on user satisfaction with support offered.	Gaps: Some countries don't have localized content; not customized consistently for youth across the company.	Gaps: We don't know which products and use cases are the most impactful; could do some more work on quality refinements (e.g., Graph cleanup).
	Measurement Centralized way to measure the topic and track progress against our success state.	Gaps: No centralized measure; don't know impact of current products.	Gaps: Don't know impact of current products or have measurement for the supportiveness of our current products.	Gaps: Don't have a way to define or measure progress toward long-term success.	Gaps: No centralized measure across apps. There is little empirical evidence on the impact of our products, and which products and use cases are most impactful.
	Narrative Centralized narrative where we are transparent about all of our work, and have public advocates for it. (Needs to be driven by Arguments to Win)	Gaps: No centralized narrative or strong public advocates (opportunity to be proactive for the metaverse).	Gaps: No centralized narrative; could have more public advocates for the whole family of apps.	Gap: Addressing perceived "adjacent" problems (e.g. Problematic Use, B&H, Eating Disorders) even if most evidence does not suggest they are actual drivers of SSI.	Gaps: No centralized narrative; other well-being topics detract; no strong empirical evidence or public advocates (strong opportunity to be proactive for the metaverse)

* After considering 1,000+ well-being topics, we [selected](#) the top topics that key experts and policy stakeholders advocate are important for us to focus on, and where we are currently underinvested:

problematic use, bullying + harassment, connections, SSI. These topics are also highly aligned with what [teens](#) want Facebook and Instagram to prioritize.