

AMENDED Exhibit 285

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=RECIPIENTS/CN=4781EB6C52B84E869557B5166AF750F8 [REDACTED]]
Sent: 10/28/2020 11:22:25 PM
To: [REDACTED]; Wendy Gross [REDACTED]; Kristin Hendrix [REDACTED]; [REDACTED]; [REDACTED]; Shilpa Mody [REDACTED]; Kyle Andrews [REDACTED]
Subject: Message summary [{"otherUserFbId":null,"threadFbId":1678302185528708}]

Kyle Robert Andrews (10/28/2020 10:43:06 PDT):
 >hey peeps, can someone send me our currently approved age question?

Kyle Robert Andrews (10/28/2020 10:49:21 PDT):
 >My memory is something like:

>
 >13-15
 >16-18
 >19-25
 >26-30
 >31-45
 >46+

Kyle Robert Andrews (10/28/2020 10:50:08 PDT):
 >We can't give people the ability to say they're under 13, right? So maybe there's also an 'other' category?

Wendy Tegge Gross (10/28/2020 10:51:21 PDT):
 >I've been given a hard no to other category

Wendy Tegge Gross (10/28/2020 10:51:40 PDT):
 >especially if the upper end is a 46+, since other would, by definition, be under 14

Wendy Tegge Gross (10/28/2020 10:51:41 PDT):
 >*13

Wendy Tegge Gross (10/28/2020 10:53:39 PDT):
 >The overall guidance I've been given from PXFN is:
 >(1) use "what is your age?" as the stem
 >(2) don't use "other age" as a category, especially if the highest category is "and up"
 >(3) include a "Prefer not to disclose" option

Kyle Robert Andrews (10/28/2020 10:59:35 PDT):
 >Great, thanks. So this would be ok:

>
 >
 >What is your age?
 >-13-15
 >-16-18
 >-19-21
 >-22-26
 >-27-35
 >-35-44
 >-45+
 >-Prefer not to disclose

Wendy Tegge Gross (10/28/2020 11:00:20 PDT):
 >I've had PXFN approve similar questions in the past, yes

Kyle Robert Andrews (10/28/2020 11:00:30 PDT):
 >thank you!!

Shilpa Mody (10/28/2020 11:01:02 PDT):
 >except 35 is there twice!

Shilpa Mody (10/28/2020 11:01:21 PDT):
 >currently 35 years old and confused on how to answer your survey q

Kyle Robert Andrews (10/28/2020 11:01:54 PDT):
 >haha great catch! probably a sign i shouldn't write survey questions live in chat threads

Kyle Robert Andrews (10/28/2020 11:15:20 PDT):

>Jen and I were just joking that 'just a number' would be a great response option instead of 'prefer not to disclose'

■ (10/28/2020 12:42:14 PDT):

>Would it be ok to let people choose under 13 for off-platform, unbranded surveys (so that they can be terminated)?

Kyle Robert Andrews (10/28/2020 14:25:12 PDT):

>Hmm, maybe if we're not collecting any identifying info before terminating? My understanding was we can't ask if they're under 13 because it means we'd have to delete their account

■ (10/28/2020 15:26:22 PDT):

>Makes sense. I'm reviewing an off-platform survey asking that, and it's unbranded, so it's not associated with any FB/IG account or collecting any PII. So I guess that is fine.

Dr. Kristin Shay Hendrix (10/28/2020 16:22:25 PDT):

>I just thought it was a "select all that apply" question ... 😊