

AMENDED Exhibit 287

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=EXTERNAL (FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN=95620A4B488D4CA98DD3431EFB051B26]
 Sent: 2/6/2021 12:56:46 AM
 To: [REDACTED]
 Subject: Message summary [{"otherUserFbId":100026735829495,"threadFbId":null}]

[REDACTED] (2/05/2021 10:04:36 PST):

>Happy Friday, [REDACTED]! I wanted to check in on if my feedback to the youth safety proposal makes sense?

[REDACTED] (2/05/2021 10:06:32 PST):

>Hi [REDACTED]! Yea totally all makes sense. I responded to your email with responses and also a question for you regarding inclusion of 10-12 yos. Here is my response for that particular request:

>

>For context on age selection: I have not included younger kids (10-12 yos) in this research for a number of reasons: 1) Already high risk to kids, 2) Although there are definitely kids this age on IG, I'm concerned about risks of disclosure since they aren't supposed to be on IG at all. Note, I'm keeping the recruit as tight as possible given the very wide ask (i.e., to understand child-adult sexual-related content/behavior/interactions, and to also explore viable product opportunities).

>

>With that said we can definitely look into whether this is possible (and what kind of questions we can ask them). I'd love to set up time with you to understand your biggest questions. I can ask vendors to outline their capabilities and costs.

[REDACTED] (2/05/2021 10:10:44 PST):

>Oh I am still behind on email and missed that response, thank you! I'll read through that now.

>For ages 10-12, I'm not suggesting we find this age group using IG (and I think policy wouldn't allow us to try due to violation). What I'm wondering is how big we are going here for child safety. Should we be looking at how these younger ages use digital products more broadly (not IG) - and where they are establishing norms or risks in this digital ecosystem (do they make friends on fortnite or discord that they bring to social media later). We also have messenger kids for those ages 8-12 which could potentially come up too

[REDACTED] (2/05/2021 10:13:47 PST):

>Hmm good point. We're already coving a ton of stuff in the interviews (that are really specific to bad interactions), but I definitely see the value in speaking with younger kids to see what's on the horizon for us. Let me think a bit deeper on this and how we can either incorporate this into this study or maybe a different study.

[REDACTED] (2/05/2021 10:14:54 PST):

>Do you have time today at 12:30 for a quick sync?

[REDACTED] (2/05/2021 10:19:19 PST):

>[REDACTED] in Q&A just shared exploring an IG experience for under 13 🤔

[REDACTED] (2/05/2021 10:21:11 PST):

>Darn I have a presentation at time so I can't miss it. Should we meet at 5:30pm?

[REDACTED] (2/05/2021 10:21:36 PST):

>If that doesn't work my schedules is pretty open on Monday.

[REDACTED] (2/05/2021 10:22:44 PST):

>11am today I could move OR Mon 10am

[REDACTED] (2/05/2021 10:23:33 PST):

>11am works for me. I'll send an invite

[REDACTED] (2/05/2021 11:02:13 PST):

>I'll call you directly, BJN is not letting me on

[REDACTED] (2/05/2021 15:32:32 PST):

>Oculus also has safety research among youth, its sensitive may need access request, [REDACTED] is the research POC.

[REDACTED] (2/05/2021 15:48:44 PST):

>Also do you recall who was the LON research POC we worked with? wanted to double confirm we've connected with CI and the central CEI teams.
Thanks [REDACTED]

[REDACTED] (2/05/2021 15:55:25 PST):

[REDACTED] (2/05/2021 16:30:13 PST):

>I'm getting a few more contacts for you in case you haven't already connected:
[REDACTED] in messenger might be some others in FRL too

[REDACTED] (2/05/2021 16:49:35 PST):

>I'll reach out to [REDACTED]

[REDACTED] (2/05/2021 16:50:05 PST):

>Oh yes! I've spoken to [REDACTED]

[REDACTED] (2/05/2021 16:51:53 PST):

>I did speak [REDACTED] about this. Here is a list of people we have chatted with to get up to speed on this topic:
<https://fb.quip.com/7kbYA1UUsyYC#UcoACAhPIG6>

[REDACTED] (2/05/2021 16:53:25 PST):

>Is this the [REDACTED] that you're referring to? <https://fb.workplace.com/profile.php?id=100026141258227>

[REDACTED] (2/05/2021 16:55:02 PST):

>Thank you! This list is awesome, and what a full cast to bring along in the journey.

[REDACTED] (2/05/2021 16:56:46 PST):

>Ah maybe not [REDACTED] after all

>" For FRL: If more software related, no need to loop in [REDACTED] as he focuses on hardware and perception science

>- For Oculus, [REDACTED] is focused on Teens, [REDACTED] on Integrity

>- For Portal: [REDACTED] on youth experiences and co-experiences in general.

>

>Thanks for looping us in, great to leverage insights in this space!"