

AMENDED Exhibit 288

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

>, Brady Lauback >, Pratiti Raychoudhury >, >
 >
 >
 Cc: >, Moira Burke >
 >
 >
 >
Subject: Re: Youth Family Data Circle - State of Youth Integrity

Thank you for the great presentation today, and for this summary >

I'm very concerned about the lack of capacity, especially given our efforts on Youth across the company. I don't believe this is well understood by leadership and would like us to raise awareness of this, so we can advocate to staff the teams better. Please let me know how I can help here.

From: >
Date: Friday, April 23, 2021 at 3:38 PM
To: >
 >
 Kristin Hendrix > Brady Lauback > Pratiti Raychoudhury >
 >
 >
 Cc: > > > Moira Burke >
 > @fb.com> >
Subject: Re: Youth Family Data Circle - State of Youth Integrity

Thanks to everyone who participated in this and to > and > for prepping some quips and leading discussion.

While our objective did not include creating any action items, as a form of summary I would like to call out some of the key risks/issues that stood out to me (others can feel free to add to this) :

1. We use central age prediction to identify minors and adults. To our awareness, there is no effort to address adversarial evasion of age prediction. (It's worth calling out an analogy to location prediction, where historically there has been a team to address location prediction evasion, though there is recent discussion of whether that team should find a new home or even continue.)
2. Along the lines above, there is no focused effort to understand/address adults compromising the accounts of minors to facilitate abuse.
3. We don't know how robust age prediction is to (evolving) product contexts, e.g. E2EE, ePD and other potential privacy regulations, AP+, MSGR-only accounts (though are these being deprecated?), etc.
4. We do not have a specialized focus on minors within B&H.
5. We do not really have any MSGR coverage within B&H (except this may find a home in the future with an Unwanted Interactions archetype).
6. (Implicitly, to my awareness, we do not have a specialized focus on minors within any other problem areas in Central Integrity.)
7. Age verification (for under 13) has a big backlog and demand is outpacing supply.
8. Age verification has no ground truth to give robust measurement of effectiveness. Some reviews lack market specialization.
9. Perhaps the biggest issue: progress on these and any other issues not raised is hampered by lack of capacity. Indeed, we didn't dwell so much on gaps on existing areas of coverage but they are substantial as

Hi,
Sharing 2 context/preread docs ahead of our discussion on Friday:

1. [Underage and Age Verification 1-Pager](#)
2. [I2 and Youth data summary](#)

Thanks,
[REDACTED]

From: [REDACTED]
Sent: 16 April 2021 19:49
To: [REDACTED]; Kristin Hendrix; Brady Lauback; Pratiti Raychoudhury; [REDACTED]
[REDACTED]
Cc: [REDACTED]; Moira Burke; [REDACTED]
Subject: Youth Family Data Circle - State of Youth Integrity
When: 23 April 2021 12:00-12:30 (UTC-05:00) Eastern Time (US & Canada).
Where:

Agenda: Deep dive into data and analytics relating to youth, across the family of apps. Goal is to gather input and feedback to keep youth initiatives moving forward, prioritizing the right data work, and ensure tight collaboration across the family

[Do Not Forward]

Join Zoom Meeting

<https://fb.zoom.us/j/95209865224>

Meeting ID: 952 0986 5224

Passcode: 195635