

AMENDED Exhibit 302

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:[REDACTED]

Sent: 11/23/2021 5:34:21 PM

To: [REDACTED]; Karina Newton [REDACTED]; [REDACTED]; [REDACTED]

Subject: Message summary [{"otherUserFbId":null,"threadFbId":4576069352481129}]

██████████ (11/23/2021 06:33:47 PST):
>precisely (that we can't commit to both)

[REDACTED] (11/23/2021 06:34:09 PST):
>My understanding was total hours was proposed for several reasons: (a) much easier to implement, (b) considered tablestakes compared to competition, and (c) time of day would be a fast follow. Both are important and solve somewhat different issues: total time solves for addiction, time of day solves for certain illicit behaviors may happen more at night and becoming sleep deprived due to use of phone. If work is about equal, I would go with time of day. However, total time made sense to me if not, assuming fast follow.

Karina Lynn Newton (11/23/2021 07:57:12 PST):

>I feel strongly total amount of screen time is what we need to go out with first - I obviously don't agree with this characterization, but the biggest charge that we're facing is that we're targeting teens with an addictive product that they aren't yet equipped with the skills to moderate their time (which isn't about when they use it, but how much they use it). I agree 'quiet hours' will be a great tool for parents and teens but it does not address the core charge we need to answer first.

Vaishnavi Jayakumar (11/23/2021 08:05:56 PST):

>I agree that we need to address the charge that we build an addictive product, but from a wellbeing perspective, blocking hours are a much more valuable intervention for teens and parents, and something that will set us apart when we launch. Screen time controls won't break through the noise of what other companies have been doing for years, but blocking hours will show that we're actually critically thinking about teen wellbeing. If the level of eng effort is about the same, that's what we should prioritise. The Digital Wellness Lab just published this yesterday - this part in particular speaks to this:

>"Preteens who got fewer than the recommended hours of sleep... were more likely to have brain networks that were less efficient, less able to adapt and rewire, and less resilient to stress."

>
><https://answers.childrenshospital.org/sleep-brain/>

>The DWL also agrees that when young people are using their screens is an incredibly important intervention, much more than total time spent.

[REDACTED] (11/23/2021 08:19:11 PST):

>Vaishnavi, thanks for posting the article. This is where I was coming from as well. As someone who used to work on sleep products, sleep is essential to well being, and late night use is a huge issue among teens (in fact, sleep experts would say not to do any screentime before bed, not just late night use). Sleep is tied to so many aspects of health, even heart functioning. My only reason for backing going out with total time first was just because my understanding was it could be implemented earlier and it is tablestakes. However, if it can be implemented in time and you can build a solid narrative around it, then I agree has more impact.

Karina Lynn Newton (11/23/2021 09:23:24 PST):

>I don't disagree with any of that and also it's well understood research that parents can already employee through device level downtime controls too (which they can already do without parental controls on IG either for the whole device or app specific or categories of apps). My point isn't that it's not valuable (it's super important- esp for the dialogue btw parents and teens about developing a healthy relationship with social media), my point is right now what we need to land most externally is that we empower parents with controls that are against what they perceive to be our business interest (total time spent). After landing that, we have more room for nuance and valuable dialogue.

██████████ (11/23/2021 09:30:48 PST):

>I think we agree that both are important. But from an external perception perspective - what is more prevalent? Teens using it for too long or teens using it during late hours?

██████████ (11/23/2021 09:31:03 PST):

>The prevalence might help resolve this issue

██████████ (11/23/2021 09:31:59 PST):

>The answer is both , but which is more prevalent and also which is the issue that we get dinged for externally? We can prioritize that first and do a fast follow with the other one

██████████ (11/23/2021 09:32:47 PST):

>But Karina/Vaishnavi, we need to come to a resolution on this next week in order to commit to either one please

Vaishnavi Jayakumar (11/23/2021 09:34:00 PST):

>We can discuss on Monday across ██████████ / Karina / me and come back with a policy POV and any *asterisks that need to accompany the recommendation 😊

██████████ (11/23/2021 09:34:21 PST):

>We hear all the time about teens spending hours on body images and so forth - which makes me lean towards total time. But leave it to you two to help guide