

AMENDED Exhibit 330

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

1:1 chat with [REDACTED]@s.whatsapp.net

From: me; time: 10/14/2021 06:42:06; timestamp: 1634218926915

I was surprised to see this:

<https://www.bloomberg.com/news/articles/2021-10-13/early-facebook-investor-reid-hoffman-says-people-have-lost-trust>

From: me; time: 10/14/2021 06:44:02; timestamp: 1634219042731

We're industry-leading on both the actions we've taken on safety and transparency around them.

From: me; time: 10/14/2021 06:48:18; timestamp: 1634219298523

Normally in these cycles I assume good faith and there's usually something I can point to that I wish we'd done differently. In this case, we were introspective and did the research (which many other companies wouldn't), the findings showed largely positive effects on mental health (unlike what the media has portrayed), and we took on large-scale programs like testing disabling likes to see if it helped with social comparison. We've also paused Instagram Kids to because politicians and the media are worried about it even though most child safety experts think it's good, we're building more parental controls for teens (an area we're already leading), etc.

From: 16509962495@s.whatsapp.net; time: 10/14/2021 17:03:30; timestamp: 1634256210220

Hey sir -- the write-up is somewhat different than the TV interview. You can watch that if you want. Essentially what I said was: great that FB is doing the research, what we need to see now is how they are acting to improve it, fix the harms. I'm disappointed that they have not immediately revealed that. I talked to some ex-FB folks

From: [REDACTED].whatsapp.net; time: 10/14/2021 17:03:54; timestamp: 1634256234953

(More on the ex-FB folks in a second. - call just came in)

From: me; time: 10/14/2021 17:05:18; timestamp: 1634256318000

That is not how it came across at all. And we have communicated what our plan to try to address some of the issues, but we are not the primary cause of teen mental health issues and therefore cannot fully resolve them.

From: [REDACTED].whatsapp.net; time: 10/14/2021 17:05:37; timestamp: 1634256337637

More shortly.

From: [REDACTED].whatsapp.net; time: 10/14/2021 17:52:00; timestamp: 1634259120155

... I'm disappointed that they haven't revealed now, relative to the whistleblower's claims, what they're doing on the issue. It's incumbent upon companies that when they discover negative impact that they then immediately start acting upon what they discover. It seems like a bad fact that FB disbanded the Civic Integrity group. And I'm disappointed by the fact that FB hasn't responded to whistleblower by answering with the substantive actions. So, there is a reasonable trust issue here by the public. And, how does this need to be addressed? Increased transparency by Facebook, which should focus on rebuilding trust. In the quick pre-discussion where they mentioned they were going to ask about FB - I told them that I supported you as CEO (so they didn't ask that question); that I am opposed to anti-trust (which did come up; breaking up FB - which I opposed); and that I had optimism that you guys could make it happen.

From: [REDACTED].whatsapp.net; time: 10/14/2021 17:56:18; timestamp: 1634259378248

Additionally, as back drop, I have chatted with a few ex-FBers, uncorrelated, different groups, over the last week. And they all (to a person) told me that FB culture is emphasizing sessions (#, length) over everything else and that they felt that this interpretation of "emphasizing profit over people" was accurate. So, I felt that the unequivocal defense which I've given over the last 15 years wasn't really maintainable. So, I picked the area that I felt that I could defend you guys and drew my line there, which I realize is different than where you guys are drawing the line. (As a side note, unfortunately the trump election and pandemic got in the way -- I've been meaning to talk with you about a number of these things and have made noises at our various group meals, etc., but probably should have arranged earlier.)

From: [REDACTED].whatsapp.net; time: 10/14/2021 17:59:24; timestamp: 1634259564840

And finally, to your last point I agree that Instagram and FB are not the sole determiners of mental health issues. And perhaps the negative data was done in a sloppy way, etc. etc., but what is true now (from a trust and society perspective) is that it's not trust building to say: "this whistleblower who has come forward, brought a bunch of data with her, etc., and has some serious considerations" -- this work is just sloppy, one-sided, and part of a mean agenda. It can include that, but always needs to be: here's how we are investing in this issue and making progress on it.

From: [REDACTED].whatsapp.net; time: 10/14/2021 18:01:09; timestamp: 1634259669496

Anyway -- I do have faith in you, and you (plural) -- and have said in numerous venues when asked that I'm optimistic on it. May not have been that interview (although if I didn't say it, it might have implied the counter) -- will go re-watch. My folks watched it and thought that I expressed it the right way -- perhaps lens-biased.

From: [REDACTED].whatsapp.net; time: 10/14/2021 18:01:46; timestamp: 1634259706583

Finally -- I understand if this reduces confidence in me, and if you'd like, I will tender my resignation from the Biohub board.

From: me; time: 10/14/2021 18:25:26; timestamp: 1634261126862

We started working on this as soon as we did the research. That's the right time to start the work, not when it becomes public years later. The fact that we're not doing new things only after it's public is good, not bad.

We didn't disband the civic integrity team. Rather than having a team focused on elections, we now have each product focused on elections locally -- News Feed, ads, recommendations, etc. That's an improvement, not something to be disappointed about. The leaders of the centralized team were disappointed that they didn't have a job, but the characterization that this was disbanded is wrong.

The whistleblower didn't actually work on any of these issues. She just collected a bunch of internal docs -- some she actually socially engineered her way internally to get access to -- and then released them to the media. This all seems to be orchestrated by a political operative, so I don't necessarily view her as acting in good faith here.

We already lead the industry in transparency in our actions in safety. I suppose we could always do more, but so far transparency is not creating trust -- it's mostly creating more surface area for critics to attack us. So even though I fully believe in transparency, I'm not sure that's right as a strategy.

From: me; time: 10/14/2021 18:27:42; timestamp: 1634261262590

Of course we have engagement metrics and goals. Teams want people to use their products more. I don't think that's bad unless you don't also have appropriate counter-metrics, which in this case I think we do have. Now, different people will always draw the line on certain specific tradeoffs differently, and it's easy to lob the critique that we're prioritizing profits when we don't do exactly what someone wants. But almost always the tradeoffs are more complex about making the best product, not about trying to make money or some other shorter term objective.

From: me; time: 10/14/2021 18:29:34; timestamp: 1634261374781

I don't think this is connected to your Biohub service at all. I suppose if you lose confidence in me or if you want to distance yourself from me (which plenty of former friends of mine have done), then you could also choose to leave if you want. I'd be disappointed if you did that and that's not the outcome I'm looking for.

From: me; time: 10/14/2021 18:30:34; timestamp: 1634261434994

Overall I was just surprised to see this. What you say you intended to communicate clearly didn't get reflected in the headlines. Most people who sent this to me sent it in the context of "another friend is piling on".

From: me; time: 10/14/2021 18:31:31; timestamp: 1634261491962

I appreciate you clarifying this and taking the time to share what you've heard and what you meant.

From: [REDACTED].whatsapp.net; time: 10/14/2021 18:50:43; timestamp: 1634262643290

More soon. But from my side I view us as friends and allies. Running to a dinner with George w bush so more shortly.

From: [REDACTED].whatsapp.net; time: 10/14/2021 18:51:08; timestamp: 1634262668719

The headlines are always fucked up.