

AMENDED Exhibit 339

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

DOCUMENT SLIPSHEET

Bates Number: META3047MDL-020-00652959-META3047MDL-020-00652960

Custodian: NEWTON_KARINA

Author:

Filename: RE: [INSTAGRAM][SEV2] TEENS RECEIVING DM REQUESTS FROM UNCONNECTED ADULTS

Create Date: 3-10-2022 12:00 AM

Last Modified Date: 3-10-2022 12:00 AM

TNAG BEGBATES: METATNAG-005-00783111

TNAG ENDBATES: METATNAG-005-00783112

MAAG BEGBATES: METAMAAG-008-00783111

MAAG ENDBATES: METAMAAG-008-00783112



Message

From: [REDACTED] [/O=THEFACEBOOK/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=23F1ABE9F4D841C5BEAF8C6D0EFB5E96 [REDACTED]]
Sent: 3/11/2022 1:53:54 AM
BCC: Karina Newton [REDACTED]
Subject: Re: [Instagram][SEV2] Teens receiving DM requests from unconnected adults

SEV Manager S262678 (Updated, In Progress)
 Teens receiving DM requests from unconnected adults

Recent activity by [REDACTED]

1. In terms of POC, Message delivery controls are owned by the UC team [REDACTED] is the PM, I'm the designer and [REDACTED] is the eng who knows all the rules). Adult/minor interventions are own by the Child Safety team [REDACTED] is the PM, and I built the design).
2. An adult cannot message a teens, in the experience the composer is blocked
3. There is no difference between private and public default reachability settings: FoF on FB + Followers + FB friends + other on FB + other on IG go in your message request folder by default for IG.

[REDACTED], I'm talking under your control

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Status: In Progress

Impacted Areas: Instagram > Community, Privacy Incident > Privacy, Privacy Incident, Instagram

Level: 2

Created at: 2022/02/28 10:42am UTC-10:00 **Started at:** Not Specified

How the issue was detected:

User impact: Teens receiving DM requests from unconnected adults, breaking public commitment that we made. 2 specific potential issues being investigated:

Account without predicted age (but with stated age) potentially are not included in the logic to block DM requests from adults to minors. Expected by product team but potentially breaks public commitment.

Accounts with predicted age not being blocked from sending/receiving DM requests. Not expected by product team, bug if occurring.

Commitment

(<https://l.facebook.com/l.php?u=https%3A%2F%2Fabout.instagram.com%2Fblog%2Fannouncements%2Fcontinuing-to-make-instagram-safer-for-the-youngest-members-of-our->

community%3Fref%3Dshareable&h=AT0TdTMKv6FuRTLgSGmzgs_MC_vfmsRw-q5sdsknAmT2WWWjrQfOm7WEYuLII0BVR6-tJMExEVjj0ZRaxRbuLmfMRJFyvoYSlzjXpZixn8oj64t2tYJ-8ihlIzMpFQlIu948ifZvcTOBSP0zKfKzmzgs_g&s=1): "feature that prevents adults from sending messages to people under 18 who don't follow them. For example, when an adult tries to message a teen who doesn't follow them, they receive a notification that DM'ing them isn't an option. This feature relies on our work to predict peoples' ages using machine learning technology, and the age people give us when they sign up."

Summary of what we know now (as of 2022/03/03, 11:39 AM EST):

- 1) 50% of message requests to predicted teen dau are from predicted non-teens
 - a) In this 50% estimate only, "predicted" includes the case where when we have no stated age
 - b) In this 50% estimate only, the logic is: use US age-integrity model for teen/non teen, else use stated age, else (if stated age is missing) assume non teen.
- 2) 97% of non-teen -> teen message requests are either because
 - a) The adult sender is 18-20 years old, (66.6%)
 - b) We have neither age-integrity-model predicted nor stated age for the sender (30.3%)
 - i) In these situations, we believe the sender is more likely to actually be an adult
 - ii) The age-integrity model operationally only covers the US
- 3) The remaining 3% of non-teen -> teen requests may be because users are shielded (verified/celebrities), and analytics/eng are looking into this to confirm.

Owner:

[REDACTED] Work: [REDACTED]

Opened by:

[REDACTED] Work: [REDACTED]

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