

AMENDED Exhibit 352

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: 10/30/2020 3:11:40 AM
 To: [REDACTED]; Darius Kilstein [REDACTED]
 Subject: Message summary [{"otherUserFbId":100022405501890,"threadFbId":null}]

Darius Kilstein (10/30/2020 00:38:48 PDT):

>Oh hey, super sorry about that, definitely not my intention!!

>

>Looking back, wasn't a great choice of words for somebody I've never worked with!

>

>Thanks for the feedback, will be more careful making first impressions:-) @silent

Darius Kilstein (10/30/2020 00:41:53 PDT):

>Also just to be clear, I'm very supportive of this work stream. Actually an analyst on my team first fogged the problem about 1.5 years ago and we were surprised nobody picked it up in that time frame, so definitely want to make sure it works! @silent

Darius Kilstein (10/30/2020 00:42:21 PDT):

>Flagged* @silent

Darius Kilstein (10/30/2020 00:44:03 PDT):

>This could work.

>

>I wonder what % of grooming happens from people with at least 1 NFX action?

>

>Like maybe there's a solution for non mutual friending that does not require a prior action against them @silent

[REDACTED] (10/30/2020 00:44:59 PDT):

>Our plan is

> to run a small experiment with these conditions, then run classifier estimated prevalence over that to measure the impact against projected impact in Topline engagement

Darius Kilstein (10/30/2020 00:45:00 PDT):

>Lastly, we have reasonable stated age coverage, so that's what I was eluding to for a different way, because then you could start looking at actual age brackets, happy to talk through that path with you @silent

[REDACTED] (10/30/2020 00:45:24 PDT):

>The issue here is that people lie, and we know that's quite prevalent

[REDACTED] (10/30/2020 00:46:04 PDT):

>Especially groomers - they lie to bypass our detection and even help them find minors

[REDACTED] (10/30/2020 00:46:28 PDT):

>Will work with DS on this to size up

[REDACTED] (10/30/2020 00:46:48 PDT):

>It's in progress now

Darius Kilstein (10/30/2020 00:47:55 PDT):

>Have we considered settings to just let people turn off receiving messages from people that do not follow them?

Darius Kilstein (10/30/2020 00:48:04 PDT):

>Don't*

[REDACTED] (10/30/2020 00:49:35 PDT):

>We have, and IGWB even explored private by default for teens but the growth impact was too high and the decision was to explore more nuanced and less blunt solutions.

[REDACTED] (10/30/2020 00:49:49 PDT):

>Which is how we got here!

Darius Kilstein (10/30/2020 00:50:20 PDT):

>Ya PBD was my team :-p wasn't an elegant solution. Nobody looked at the messaging solution

Darius Kilstein (10/30/2020 00:50:36 PDT):

>I think it's worth considering down the track

Meta-Kilstein-77

12/18/2024

Jenny L. Griffin, CSR

[REDACTED] (10/30/2020 00:50:55 PDT):

>These restrictions on messaging and recommendations/search are what we have on FB today. We need to have some equivalency on Instagram.

[REDACTED] (10/30/2020 00:51:39 PDT):

>eg: PYMK was responsible for 80% of violating adult/minor connections

Darius Kilstein (10/30/2020 00:52:03 PDT):

>I do worry about the effectiveness of the 1 nfx action, I mean definitely better than what we have today and excited to see where it goes

Darius Kilstein (10/30/2020 00:52:17 PDT):

>But ppl can create new accounts etc

[REDACTED] (10/30/2020 00:52:37 PDT):

>Yeah this is something that needs a lot of investment

Darius Kilstein (10/30/2020 00:52:44 PDT):

>Happy to help you explore a way to make it work for 0

Darius Kilstein (10/30/2020 00:53:27 PDT):

>For example I could look at people who have actions taken against them and their stated age to confirm or deny your hypothesis about age lying

[REDACTED] (10/30/2020 00:53:34 PDT):

>Is there anyone on your team who could spin a few cycles on this?

[REDACTED] (10/30/2020 00:53:40 PDT):

>This would be great!!

Darius Kilstein (10/30/2020 00:53:43 PDT):

>Ya

Darius Kilstein (10/30/2020 00:54:35 PDT):

>Eg, if we took stated age > 30 and said those people cannot message teens (via model or stated age) if they aren't being followed

Darius Kilstein (10/30/2020 00:55:06 PDT):

>Irrespective of nfx actions

Darius Kilstein (10/30/2020 00:56:06 PDT):

>Just need to find the table for nfx actions and I could whip this up in a few hrs

[REDACTED] (10/30/2020 00:56:28 PDT):

>I love something this neat

[REDACTED] (10/30/2020 00:56:54 PDT):

>I do find we have a bias towards overly complex solutions because we can before exploring simple fixes.

Darius Kilstein (10/30/2020 00:56:54 PDT):

>Great! I'll look into it

Darius Kilstein (10/30/2020 00:57:09 PDT):

>Yeh this place is weird like that

Darius Kilstein (10/30/2020 00:57:37 PDT):

>Cool it must be late where you are sorry to keep you up

Darius Kilstein (10/30/2020 00:57:39 PDT):

>Chat soon

Darius Kilstein (10/30/2020 01:35:39 PDT):

>oh you're based in London I feel less bad about pinging you now lol

Darius Kilstein (10/30/2020 01:36:05 PDT):

>Took a quick look at the data and the datasets for CI are pretty tricky to understand, so i want to suggest a partnership b/w my team and your DS team. Who's the right DS mgr to reach out to?

[REDACTED] (10/30/2020 03:11:40 PDT):

>That group I've added you to is the working group putting all this together ☐