

AMENDED Exhibit 354

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

META3047MDL-020-00128524**Metadata**

All Custodians	Crenshaw_Liza [REDACTED]	SEMANTIC
All Paths	/Crenshaw_Liz [REDACTED] ook data file/Inbox;/Crenshaw_Liza/Top of Personal Folders/Inbox; [REDACTED] /Top of Personal Folders/Inbox	SEMANTIC
Confidentiality	HIGHLY CONFIDENTIAL (COMPETITOR)	SEMANTIC
Date Sent	11/02/2021 6:19 pm	SEMANTIC
From	[REDACTED]	SEMANTIC
Primary Date	11/02/2021 6:19 pm	DOC_TYP E_ALIAS
To	[REDACTED] < [REDACTED] >; Liza Crenshaw < [REDACTED] >	SEMANTIC

EXHIBIT
Liza Crenshaw
Social Media MDL 3047

Crenshaw 0052

Message

From: Liza Crenshaw [/O=THEFACEBOOK/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2E80C09EC6F9459BB0281ED6DC601D4A [REDACTED]]
Sent: 11/2/2021 6:19:57 PM
To: [REDACTED]; Liza Crenshaw [REDACTED]
Subject: Message summary [{"otherUserFbId":100024423100577,"threadFbId":null}]
Attachments: 249317974_250554210276399_5368562044694284371_n.png

Elizabeth Crenshaw (11/02/2021 09:46:04 PDT):
 >Interested in what u think about this

[REDACTED] (11/02/2021 09:46:18 PDT):
 >LOVE THIS

[REDACTED] (11/02/2021 09:46:28 PDT):
 >wbu?

[REDACTED] (11/02/2021 09:46:40 PDT):
 >realistically it won't stop the racists

Elizabeth Crenshaw (11/02/2021 09:46:42 PDT):
 >I love the intent the language was kindaaaa weird

Elizabeth Crenshaw (11/02/2021 09:46:54 PDT):
 >like patronizing, so we're trying to update a bit

[REDACTED] (11/02/2021 09:47:00 PDT):
 >and will land badly if we're still not taking enough action

[REDACTED] (11/02/2021 09:47:29 PDT):
 >yes would def love us to be able to review the copy

Elizabeth Crenshaw (11/02/2021 09:51:16 PDT):
 >yeah...ima take a closer look at this today and work on reactive etc

[REDACTED] (11/02/2021 10:07:26 PDT):
 >another qq - i saw on the agenda yesterday that teen defaults are down for 11 nov - what does that refer to?

Elizabeth Crenshaw (11/02/2021 10:58:52 PDT):
 >same thing i sent the photo of last week!!

Elizabeth Crenshaw (11/02/2021 10:58:54 PDT):
 >lemme find

[REDACTED] (11/02/2021 10:58:59 PDT):
 >gah sorry

Elizabeth Crenshaw (11/02/2021 10:59:04 PDT):
 >its ok lots of tings

[REDACTED] (11/02/2021 10:59:09 PDT):
 >in IG pals chat? i can look if so

Elizabeth Crenshaw (11/02/2021 10:59:17 PDT):
 >yes!

Elizabeth Crenshaw (11/02/2021 10:59:17 PDT):
 shared: 249317974_250554210276399_5368562044694284371_n.png

[REDACTED] (11/02/2021 10:59:25 PDT):
 >oh fuck yeh sorry!

Elizabeth Crenshaw (11/02/2021 10:59:45 PDT):
 >i did ask on our pals call though what ppl's preference was on announcing and when

[REDACTED] (11/02/2021 11:00:09 PDT):
 >hmmm - prob when we announce take a break?

[REDACTED] (11/02/2021 11:00:15 PDT):

>although these are pretty minor right

Elizabeth Crenshaw (11/02/2021 11:00:23 PDT):
>very minor

Elizabeth Crenshaw (11/02/2021 11:00:30 PDT):
>we were thinking about take a break but theyre pretty privacy focused

Elizabeth Crenshaw (11/02/2021 11:00:43 PDT):
>feels kinda different

[REDACTED] (11/02/2021 11:01:00 PDT):
>honestly these are like hygiene - i wouldnt even announce, would just reference in our normal talking points

Elizabeth Crenshaw (11/02/2021 11:01:52 PDT):
>yeah - we're going to create a little infographic/timeline of youth safety efforts that we were thinking we'd include them in

[REDACTED] (11/02/2021 11:01:57 PDT):
>oh nice

Elizabeth Crenshaw (11/02/2021 11:02:30 PDT):
>and perhaps just give small heads up to a few reporters but nothing major

Elizabeth Crenshaw (11/02/2021 11:02:33 PDT):
>to ur point

[REDACTED] (11/02/2021 11:04:57 PDT):
>id be slightly nervous about alerting reporters to the fact that these privacy settings were defaulted off before ☹️

[REDACTED] (11/02/2021 11:05:37 PDT):
>also - it occurred to me the other day - we say 'there are lots of valid reasons why young people would have public accounts', and cite the example of creators/young entrepreneurs

Elizabeth Crenshaw (11/02/2021 11:05:46 PDT):
>yes we do

[REDACTED] (11/02/2021 11:05:49 PDT):
>but wouldnt they have a creator/biz accounts, which are automatically public?

Elizabeth Crenshaw (11/02/2021 11:10:10 PDT):
>yes

Elizabeth Crenshaw (11/02/2021 11:10:14 PDT):
>but still valid

Elizabeth Crenshaw (11/02/2021 11:10:22 PDT):
>i think???

[REDACTED] (11/02/2021 11:11:04 PDT):
>it just made me think, then what example are we actually thinking of when we say there are lots of valid reason why young people would want/need a public PERSONAL account

Elizabeth Crenshaw (11/02/2021 11:12:00 PDT):
>well some athletes and such still use personal accounts

[REDACTED] (11/02/2021 11:12:13 PDT):
>i guess

[REDACTED] (11/02/2021 11:12:33 PDT):
>just feels like we're then making the rules for those exceptions, versus deciding to err on safety and just say under 16 accounts on IG are private

[REDACTED] (11/02/2021 11:13:13 PDT):
>the risk could then be if u16s then switched to professional accounts so they could have public accounts - but im not sure how big a risk that is

Elizabeth Crenshaw (11/02/2021 11:14:02 PDT):
>i dont disagree

Elizabeth Crenshaw (11/02/2021 11:14:08 PDT):
>but you know how contentious this change alone was

[REDACTED] (11/02/2021 11:16:54 PDT):
>it's absolutely mad that it was so contentious

[REDACTED] (11/02/2021 11:17:01 PDT):
>with adam or others too?

[REDACTED] (11/02/2021 11:17:17 PDT):
>we will never get out of this mess if he/we're not just prepared to ERR ON THE SIDE OF SAFETY

[REDACTED] (11/02/2021 11:17:18 PDT):
>jesus

[REDACTED] (11/02/2021 11:17:39 PDT):
>i know i'm advocating for NOT letting them switch back - but i don't get why defaulting into private was contentious, given they CAN just switch back!

Elizabeth Crenshaw (11/02/2021 11:17:45 PDT):
>it was mostly adam for sure

Elizabeth Crenshaw (11/02/2021 11:17:49 PDT):
>it was a huge growth hit

Elizabeth Crenshaw (11/02/2021 11:17:55 PDT):
>like shockingly so

[REDACTED] (11/02/2021 11:18:25 PDT):
>would he want any tom dick or harry being able to see all his kids' content, follow them etc? is he fucking nuts?

[REDACTED] (11/02/2021 11:18:41 PDT):
>interesting

[REDACTED] (11/02/2021 11:18:54 PDT):
>well not doing it for that reason would have been unforgivable so im glad we did!

Elizabeth Crenshaw (11/02/2021 11:19:52 PDT):
>i mean we did NOT do it for a very long period of time because of that

Elizabeth Crenshaw (11/02/2021 11:19:57 PDT):
>i agree though