

AMENDED Exhibit 374

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: Margaret Stewart [/O=THEFACEBOOK/OU=EXTERNAL (FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN=[REDACTED]]
Sent: 5/12/2020 9:38:13 PM
To: Mark Zuckerberg [REDACTED]
CC: Sheryl Sandberg [REDACTED]; Mike Schroepfer [REDACTED]; Monika Bickert [REDACTED]; Nick Clegg [REDACTED]
Subject: Re: Pre-read on Cosmetic Surgery AR Effects (next Thursday)

- some

Hey there, thanks for getting back to us on this. I respect your call on this and I'll support it, but want to just say for the record that I don't think it's the right call given the risks.

As a parent of two teenage girls - one of whom has been hospitalized twice in part for body dysmorphia - I can tell you the pressure on them and their peers coming through social media is intense with respect to body image. I recognize that my family situation makes me somewhat biased but it also gives me first hand knowledge that most of the people looking at this issue don't have. There won't be hard data to prove causal harm for many years, if ever, but I was hoping we could maintain a moderately protective stance here given the risk to minors.

I know these are difficult tradeoffs. I don't minimize the concerns about restricting voice and the internationalization angle. I just hope that years from now we will look back and feel good about the decision we made here.

I wanted to take a moment to express my disagreement even as we move to implement this decision. Thanks for listening.

Margaret Gould Stewart
 VP of Product Design
 Facebook, Inc

From: Mark Zuckerberg <[REDACTED]>
Sent: Friday, May 8, 2020 2:28 PM
To: [REDACTED]; Nick Clegg <[REDACTED]>; Monika Bickert <[REDACTED]>; Naomi Gleit <[REDACTED]>; [REDACTED]; [REDACTED]; Mike Schroepfer <[REDACTED]>; Javier Olivan <[REDACTED]>; Andrew Bosworth <[REDACTED]>; Adam Mosseri <[REDACTED]>; Will Cathcart <[REDACTED]>; [REDACTED]; Alex Schultz <[REDACTED]>; Pratiti Raychoudhury <[REDACTED]>; Joel Kaplan <[REDACTED]>; Margaret Stewart <[REDACTED]>; [REDACTED]; [REDACTED]; Sheryl Sandberg <[REDACTED]>
Cc: [REDACTED]; [REDACTED]; mzprereads <[REDACTED]>
Subject: Re: Pre-read on Cosmetic Surgery AR Effects (next Thursday)

I'm supportive of moving forward with option 2 (lifting restrictions but not promoting on IG). I don't think this is urgent to resolve, so I'm certainly willing to take a longer path to roll this out if it will help us land it better. I don't have strong opinions on other implementation details so I'll leave you to figure those out.

From: [REDACTED] <[REDACTED]>
Sent: Thursday, April 16, 2020 6:28 PM

To: Nick Clegg <[REDACTED]>; Monika Bickert <[REDACTED]>; Mark Zuckerberg <[REDACTED]>; Naomi Gleit <[REDACTED]>; [REDACTED] <[REDACTED]>; Mike Schroepfer <[REDACTED]>; Javier Olivan <[REDACTED]>; Andrew Bosworth <[REDACTED]>; [REDACTED] <[REDACTED]>; Adam Mosseri <[REDACTED]>; Will Cathcart <[REDACTED]>; [REDACTED] <[REDACTED]>; Alex Schultz <[REDACTED]>; Pratiti Raychoudhury <[REDACTED]>; Joel Kaplan <[REDACTED]>; Margaret Stewart <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; Sheryl Sandberg <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; mzprereads <[REDACTED]>
Subject: Re: Pre-read on Cosmetic Surgery AR Effects (next Thursday)

Hi @Mark – bumping because the team would love your feedback on next steps.

I've attached the original decision doc as well as the product/comms follow-up.

Thanks,

From: Nick Clegg <[REDACTED]>

Date: Wednesday, April 8, 2020 at 9:42 PM

To: [REDACTED] <[REDACTED]>, Monika Bickert <[REDACTED]>, Mark Zuckerberg <[REDACTED]>, Naomi Gleit <[REDACTED]>, [REDACTED] <[REDACTED]>, Mike Schroepfer <[REDACTED]>, Javier Olivan <[REDACTED]>, Andrew Bosworth <[REDACTED]>, [REDACTED] <[REDACTED]>, Adam Mosseri <[REDACTED]>, Will Cathcart <[REDACTED]>, [REDACTED] <[REDACTED]>, Alex Schultz <[REDACTED]>, Pratiti Raychoudhury <[REDACTED]>, Joel Kaplan <[REDACTED]>, Margaret Stewart <[REDACTED]>, [REDACTED] <[REDACTED]>, [REDACTED] <[REDACTED]>, Sheryl Sandberg <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>, [REDACTED] <[REDACTED]>, mzprereads <[REDACTED]>
Subject: Re: Pre-read on Cosmetic Surgery AR Effects (next Thursday)

+ Sheryl

From: [REDACTED] <[REDACTED]>

Date: Wednesday, April 8, 2020 at 8:51 PM

To: Monika Bickert <[REDACTED]>, Mark Zuckerberg <[REDACTED]>, Naomi Gleit <[REDACTED]>, [REDACTED] <[REDACTED]>, Mike Schroepfer <[REDACTED]>, Javier Olivan <[REDACTED]>, Andrew Bosworth <[REDACTED]>, [REDACTED] <[REDACTED]>, Adam Mosseri <[REDACTED]>, Will Cathcart <[REDACTED]>, [REDACTED] <[REDACTED]>, Alex Schultz <[REDACTED]>, Pratiti Raychoudhury <[REDACTED]>, Nick Clegg <[REDACTED]>, Joel Kaplan <[REDACTED]>, Margaret Stewart <[REDACTED]>, [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>, [REDACTED] <[REDACTED]>, mzprereads <[REDACTED]>
Subject: Re: Pre-read on Cosmetic Surgery AR Effects (next Thursday)

+ @ [REDACTED] @ [REDACTED]

Hi Mark - Attached is our product/comms plan to lift the ban on Cosmetic Surgery AR Effects. Let us know if you need any more information to decide whether we should continue, modify, or lift the temporary ban.

Thanks

From: Monika Bickert <[REDACTED]>
Date: Wednesday, April 1, 2020 at 3:03 PM
To: Mark Zuckerberg <[REDACTED]>, Naomi Gleit <[REDACTED]>, [REDACTED] <[REDACTED]>, Mike Schroepfer <[REDACTED]>, Javier Olivan <[REDACTED]>, Andrew Bosworth <[REDACTED]>, [REDACTED] <[REDACTED]>, Adam Mosseri <[REDACTED]>, Will Cathcart <[REDACTED]>, [REDACTED] <[REDACTED]>, Alex Schultz <[REDACTED]>, Pratiti Raychoudhury <[REDACTED]>, Nick Clegg <[REDACTED]>, Joel Kaplan <[REDACTED]>, Margaret Stewart <[REDACTED]>, [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>, [REDACTED] <[REDACTED]>, mzprereads <[REDACTED]>
Subject: Re: Pre-read on Cosmetic Surgery AR Effects (next Thursday)

Thanks, Mark. We will work on a plan and come back to you soon.

From: Mark Zuckerberg <[REDACTED]>
Date: Wednesday, April 1, 2020 at 2:00 PM
To: Naomi Gleit <[REDACTED]>, [REDACTED] <[REDACTED]>, Mike Schroepfer <[REDACTED]>, Javier Olivan <[REDACTED]>, Andrew Bosworth <[REDACTED]>, [REDACTED] <[REDACTED]>, Adam Mosseri <[REDACTED]>, Will Cathcart <[REDACTED]>, [REDACTED] <[REDACTED]>, Alex Schultz <[REDACTED]>, Pratiti Raychoudhury <[REDACTED]>, Nick Clegg <[REDACTED]>, Joel Kaplan <[REDACTED]>, Monika Bickert <[REDACTED]>, Margaret Stewart <[REDACTED]>, [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>, [REDACTED] <[REDACTED]>, mzprereads <[REDACTED]>
Subject: Re: Pre-read on Cosmetic Surgery AR Effects (next Thursday)

It has always felt paternalistic to me that we've limited people's ability to present themselves in these ways, especially when there's no data I've seen that suggests doing so is helpful or not doing so is harmful, and that there's clearly demand for this type of expression. I'm generally supportive of finding a way to relax or lift these bans. That said, I'm not sure I was involved with how we got to this point, and it may be very difficult to relax restrictions from where we are now. I'm interested in seeing our best plan to do so, and then I can make a call on whether this something it makes sense to prioritize doing right now.

From: Naomi Gleit <[REDACTED]>
Sent: Wednesday, April 1, 2020 12:07 PM
To: [REDACTED] <[REDACTED]>; Mark Zuckerberg <[REDACTED]>; Mike Schroepfer <[REDACTED]>; Javier Olivan <[REDACTED]>; Andrew Bosworth <[REDACTED]>; [REDACTED] <[REDACTED]>; Adam Mosseri <[REDACTED]>; Will Cathcart <[REDACTED]>; [REDACTED] <[REDACTED]>; Alex Schultz <[REDACTED]>; Pratiti Raychoudhury <[REDACTED]>; Nick Clegg <[REDACTED]>; Joel Kaplan <[REDACTED]>; Monika Bickert <[REDACTED]>; Margaret Stewart <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; mzprereads <[REDACTED]>
Subject: Re: Pre-read on Cosmetic Surgery AR Effects (next Thursday)

Hi this meeting was cancelled for tomorrow – @Mark is it possible to resolve this over email so we can save you the meeting time?

From: [REDACTED] <[REDACTED]>
Date: Thursday, March 26, 2020 at 4:11 PM
To: Mark Zuckerberg <[REDACTED]>, Mike Schroepfer <[REDACTED]>, Javier Olivan <[REDACTED]>, Andrew Bosworth <[REDACTED]>, [REDACTED] <[REDACTED]>, Adam Mosseri <[REDACTED]>, Will

Cathcart <[REDACTED]>, [REDACTED] <[REDACTED]>, Alex Schultz <[REDACTED]>, Naomi Gleit
<[REDACTED]>, Pratiti Raychoudhury <[REDACTED]>, Nick Clegg <[REDACTED]>, Joel Kaplan
<[REDACTED]>, Monika Bickert <[REDACTED]>, Margaret Stewart <[REDACTED]>, [REDACTED]
<[REDACTED]>
Cc: [REDACTED] <[REDACTED]>, [REDACTED] <[REDACTED]>, mzprereads <[REDACTED]>
Subject: Pre-read on Cosmetic Surgery AR Effects (next Thursday)

Mark- Next Thursday we are meeting to decide whether we should continue, modify, or lift the temporary ban on Cosmetic Surgery AR Effects that we instituted in October 2019 in response to expert and press concerns about potential negative wellbeing impacts (especially on minors). The pre-read is attached.

Thanks,

[REDACTED]