

AMENDED Exhibit 375

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: Nick Clegg [/O=THEFACEBOOK/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN= [REDACTED]]
Sent: 4/9/2020 4:53:48 AM
To: [REDACTED]; [REDACTED] [REDACTED]
Subject: FW: Pre-read on Cosmetic Surgery AR Effects (next Thursday)
Attachments: Cosmetic Surgery Effects_ Execution Plan.pdf

From: Nick Clegg [REDACTED]
Date: Wednesday, April 8, 2020 at 9:53 PM
To: Sheryl Sandberg [REDACTED] >
Cc: Joel Kaplan [REDACTED] >, John Pinette [REDACTED]
Subject: FW: Pre-read on Cosmetic Surgery AR Effects (next Thursday)

Sheryl – this has now gone back to Mark, I added you to the email thread.

As discussed before, I think there are multiple reasons – of principle and of practice – why reversing our ban on surgical cosmetic features would be a very unwise thing to do. We would – rightly – be accused of putting growth over responsibility.

This would be a good time for you to raise with Mark before he decides.

Reputationally, it would be a v regressive step indeed – we will be heavily attacked both in the press and by interest groups concerned about the wellbeing of adolescents, especially teenage girls. We are not depriving people of freedom to express themselves in some draconian way because we do allow other cosmetic features (make-up, cartoon etc). This ban only applies to those changes linked to cosmetic surgery effects.

The argument that we are somehow imposing our own cultural values on others holds no water – it's what we do all the time, from banning nudity in Scandinavia to defending political speech in Vietnam. We are perfectly within our rights to take a precautionary approach on something as complex and serious as young women's body image and the dangers of cosmetic surgery.

N

From: [REDACTED]
Date: Wednesday, April 8, 2020 at 8:51 PM
To: Monika Bickert [REDACTED], Mark Zuckerberg [REDACTED], Naomi Gleit [REDACTED], Andy O'Connell [REDACTED], Mike Schroepfer [REDACTED], Javier Olivan [REDACTED], Andrew Bosworth [REDACTED], Stan Chudnovsky [REDACTED], Adam Mosseri [REDACTED], Will Cathcart [REDACTED], Fidji Simo [REDACTED], Alex Schultz [REDACTED], Pratiti Raychoudhury [REDACTED], Nick Clegg [REDACTED], Joel Kaplan [REDACTED], Margaret Stewart [REDACTED], John Pinette [REDACTED], [REDACTED], [REDACTED]
Cc: [REDACTED], [REDACTED], [REDACTED], mzprereads [REDACTED]
Subject: Re: Pre-read on Cosmetic Surgery AR Effects (next Thursday)

+ @John Pinette [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], Andy O'Connell [REDACTED], Mike Schroepfer [REDACTED], Javier Olivan [REDACTED], Andrew Bosworth [REDACTED], Stan Chudnovsky [REDACTED], Adam Mosseri [REDACTED], Will Cathcart [REDACTED], Fidji Simo [REDACTED], Alex Schultz [REDACTED], Pratiti Raychoudhury [REDACTED], Nick Clegg [REDACTED], Joel Kaplan [REDACTED], Margaret Stewart [REDACTED], [REDACTED]
Cc: [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], Andy O'Connell [REDACTED], Mike Schroepfer [REDACTED], Javier Olivan [REDACTED], Andrew Bosworth [REDACTED], Stan Chudnovsky [REDACTED], Adam Mosseri [REDACTED], Will Cathcart [REDACTED], Fidji Simo [REDACTED], Alex Schultz [REDACTED], Pratiti Raychoudhury [REDACTED], Nick Clegg [REDACTED], Joel Kaplan [REDACTED], Monika Bickert [REDACTED], Margaret Stewart [REDACTED]
Cc: [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: Andy O'Connell [REDACTED]; Mark Zuckerberg [REDACTED]; Mike Schroepfer [REDACTED]; Javier Olivan [REDACTED]; Andrew Bosworth [REDACTED]; Stan Chudnovsky [REDACTED]; Adam Mosseri [REDACTED]; Will Cathcart [REDACTED]; Fidji Simo [REDACTED]; Alex Schultz [REDACTED]; Pratiti Raychoudhury [REDACTED]; Nick Clegg [REDACTED]; Joel Kaplan [REDACTED]; Monika Bickert [REDACTED]; Margaret Stewart [REDACTED]; [REDACTED]
Cc: [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: Andy O'Connell [REDACTED]
Date: Thursday, March 26, 2020 at 4:11 PM
To: Mark Zuckerberg [REDACTED], Mike Schroepfer [REDACTED], Javier Olivan [REDACTED]
Andrew Bosworth [REDACTED], Stan Chudnovsky [REDACTED], Adam Mosseri [REDACTED], Will
Cathcart [REDACTED], Fidji Simo [REDACTED], Alex Schultz [REDACTED], Naomi Gleit
[REDACTED], Pratiti Raychoudhury [REDACTED], Nick Clegg [REDACTED], Joel Kaplan
[REDACTED], Monika Bickert [REDACTED], Margaret Stewart [REDACTED], [REDACTED]
Cc: [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,
Andy