

AMENDED Exhibit 397

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=EXTERNAL
(FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN=7F43F4B6EC3343BF8ABB6F99932CBAC7]
Sent: 7/30/2020 12:29:09 AM
To: Darius Kilstein [REDACTED]; [REDACTED]
Subject: Message summary [{"otherUserFbId":100022405501890,"threadFbId":null}]

Darius Kilstein (7/29/2020 16:04:16 PDT):
 >love how you so gracefully share a kitchen with your wife in the background

Darius Kilstein (7/29/2020 16:04:23 PDT):
 >when I go to the kitchen and shes working she is NOT HAPPY

Darius Kilstein (7/29/2020 16:04:24 PDT):
 >lol

[REDACTED] (7/29/2020 16:04:25 PDT):
 >lol

[REDACTED] (7/29/2020 16:04:28 PDT):
 >I mean

[REDACTED] (7/29/2020 16:04:36 PDT):
 >I don't have many choices

[REDACTED] (7/29/2020 16:29:24 PDT):
 >It's crazy how much power we have

[REDACTED] (7/29/2020 16:29:44 PDT):
 >Especially when it comes to ranking

[REDACTED] (7/29/2020 16:30:12 PDT):
 >There are so many subtle ways to affect distribution and literally change outcomes of elections

Darius Kilstein (7/29/2020 16:31:13 PDT):
 >I dunno

Darius Kilstein (7/29/2020 16:31:25 PDT):
 >I dont think IG really influences elections that much

Darius Kilstein (7/29/2020 16:31:32 PDT):
 >FB definitely more

[REDACTED] (7/29/2020 16:31:41 PDT):
 >Oh i'm def thinking of FB inc

Darius Kilstein (7/29/2020 16:31:43 PDT):
 >but even then, are the effect sizes of social media on election results even that large?

[REDACTED] (7/29/2020 16:31:50 PDT):
 >Mostly FB

[REDACTED] (7/29/2020 16:32:23 PDT):
 >It's definitely hard to know, but when our elections get decided by like ~170K voters you start to wonder

Darius Kilstein (7/29/2020 16:32:28 PDT):
 >I see US 2020 Election work less as "don't influence the election poorly" and more of a "lets avoid a PR disaster"

[REDACTED] (7/29/2020 16:32:40 PDT):
 >100%

Darius Kilstein (7/29/2020 16:34:10 PDT):
 >Dude whats your plan to get to director

Darius Kilstein (7/29/2020 16:34:12 PDT):
 >Are you trying?

Darius Kilstein (7/29/2020 16:34:19 PDT):
 >Are you able to get there with your small team?

[REDACTED] (7/29/2020 16:34:27 PDT):
>I'm here for the fun not the money

[REDACTED] (7/29/2020 16:34:43 PDT):
>Especially the fun long nights working

Darius Kilstein (7/29/2020 16:35:30 PDT):
>Lo!

Darius Kilstein (7/29/2020 16:36:13 PDT):
>I was thinking of whether to be IC or go for Director in 2-3 years and make more money

Darius Kilstein (7/29/2020 16:36:18 PDT):
>Hence why I'm asking

Darius Kilstein (7/29/2020 16:36:28 PDT):
>Leaning towards staying as a mgr

[REDACTED] (7/29/2020 16:36:32 PDT):
>no. 100% not.

Darius Kilstein (7/29/2020 16:36:35 PDT):
>Coz I want to retire in 6 years

[REDACTED] (7/29/2020 16:36:44 PDT):
>I mean

[REDACTED] (7/29/2020 16:36:57 PDT):
>We have zero ICs in all Analytics in FB inc

Darius Kilstein (7/29/2020 16:37:01 PDT):
>Ya

Darius Kilstein (7/29/2020 16:37:02 PDT):
>lol

[REDACTED] (7/29/2020 16:37:06 PDT):
>So

Darius Kilstein (7/29/2020 16:37:08 PDT):
>Wait let me make you laugh

Darius Kilstein (7/29/2020 16:37:25 PDT):
><https://fb.quip.com/awhpAntG5OU4>

Darius Kilstein (7/29/2020 16:37:55 PDT):
>Discussed this with [REDACTED] yesterday ^ lol

Darius Kilstein (7/29/2020 16:38:05 PDT):
>Basically framed it as: suffering today vs future money

Darius Kilstein (7/29/2020 16:38:22 PDT):
>i'm leaning towards future money

[REDACTED] (7/29/2020 16:38:35 PDT):
>This is great

[REDACTED] (7/29/2020 16:38:53 PDT):
>So, this is a false dichotomy IMHO

[REDACTED] (7/29/2020 16:39:09 PDT):
>Think on [REDACTED]

[REDACTED] (7/29/2020 16:39:14 PDT):
>Doesn't work weekendsss

[REDACTED] (7/29/2020 16:39:22 PDT):
>Doesn't take shit from anyone

[REDACTED] (7/29/2020 16:39:42 PDT):
>Doesn't go to meetings if they are not about his main priority

[REDACTED] (7/29/2020 16:39:44 PDT):
>IC?

Darius Kilstein (7/29/2020 16:39:53 PDT):
>Yep that sounds great?

[REDACTED] (7/29/2020 16:39:59 PDT):
>I bet you his life is 100x better than ours

Darius Kilstein (7/29/2020 16:40:03 PDT):
>yes totally

Darius Kilstein (7/29/2020 16:40:06 PDT):
>thats what I mean

[REDACTED] (7/29/2020 16:40:10 PDT):
>So, do that for 10 years

Darius Kilstein (7/29/2020 16:40:11 PDT):
>I estimated 20% better, but ye

[REDACTED] (7/29/2020 16:40:37 PDT):
>Or become a director and retire in 6 years????

Darius Kilstein (7/29/2020 16:40:44 PDT):
>yup

Darius Kilstein (7/29/2020 16:40:50 PDT):
>correct

Darius Kilstein (7/29/2020 16:40:58 PDT):
>Thats a nice framing too

Darius Kilstein (7/29/2020 16:41:07 PDT):
>I prefer 4 years of my life

Darius Kilstein (7/29/2020 16:41:11 PDT):
>lol

Darius Kilstein (7/29/2020 16:41:19 PDT):
>I estimate my life as an IC will be 20% better

[REDACTED] (7/29/2020 16:41:40 PDT):
>Having kids changes the calculus

[REDACTED] (7/29/2020 16:41:50 PDT):
>Years aren't fungible

[REDACTED] (7/29/2020 16:42:02 PDT):
>My daughter is only going to be this cute for so long

[REDACTED] (7/29/2020 16:42:44 PDT):
>All that said, I'm still trying to go for the manager life

[REDACTED] (7/29/2020 16:43:08 PDT):
>If I get too burned out, I can move to Idaho tomorrow

Darius Kilstein (7/29/2020 16:43:11 PDT):
>What's your plan here if you dont mind me asking (feel free not to answer)

[REDACTED] (7/29/2020 16:43:17 PDT):
>And I won't have to work

Darius Kilstein (7/29/2020 16:43:36 PDT):
>Did they teach you to plant and cultivate potatoes as a kid in Venezuela? :P

[REDACTED] (7/29/2020 16:43:50 PDT):
>lol

[REDACTED] (7/29/2020 16:44:04 PDT):
>I can teach math or cook for a living

[REDACTED] (7/29/2020 16:44:13 PDT):
>Either sounds amazing

[REDACTED] (7/29/2020 16:44:49 PDT):
>I think that the worst kept secret in IG is that there is a reorg coming

Darius Kilstein (7/29/2020 16:45:12 PDT):
>oh lol actually i didnt know that

Darius Kilstein (7/29/2020 16:45:19 PDT):
>Are you getting anything good?

[REDACTED] (7/29/2020 16:45:35 PDT):

>oh right. Community is literally the only part of the company unaffected

[REDACTED] (7/29/2020 16:45:57 PDT):

>Yeah. Chaotic but good.

[REDACTED] (7/29/2020 16:46:59 PDT):

>Please don't share anything at all. Even though everyone outside of Community kind of knows, HR is being suuuuper sensitive

Darius Kilstein (7/29/2020 16:48:04 PDT):

>Nice!

Darius Kilstein (7/29/2020 16:48:18 PDT):

>Will yoru ecosystem team get to do more ecosystem stuff?

Darius Kilstein (7/29/2020 16:48:23 PDT):

>curious to see how that plugs in

Darius Kilstein (7/29/2020 16:48:25 PDT):

>to a reorg

[REDACTED] (7/29/2020 16:48:28 PDT):

>lol maybe one day

[REDACTED] (7/29/2020 16:48:51 PDT):

>I mean, to be clear the Eco team remains intact and I will still manage

Darius Kilstein (7/29/2020 16:49:00 PDT):

>subtext: I wish I managed your team

Darius Kilstein (7/29/2020 16:49:01 PDT):

>lol

Darius Kilstein (7/29/2020 16:49:12 PDT):

>It's deff the most interesting work

[REDACTED] (7/29/2020 16:49:51 PDT):

>My comment was more about the fact that now we're working on projects that in an ideal world SE would work on

[REDACTED] (7/29/2020 16:50:16 PDT):

>Well if you become an IC (or a TLM) I know what team you're joining

Darius Kilstein (7/29/2020 16:50:33 PDT):

>haha yeh it's in my quip! lol

Darius Kilstein (7/29/2020 16:50:41 PDT):

>think im gonna stick around for the benjamins tho

Darius Kilstein (7/29/2020 16:50:51 PDT):

>i dont dislike being a people manager

Darius Kilstein (7/29/2020 16:50:56 PDT):

>its just more stressful

Darius Kilstein (7/29/2020 16:51:04 PDT):

>but i enjoy the type of work roughly the same as analysis

[REDACTED] (7/29/2020 16:51:14 PDT):

>But really. [REDACTED] leads Feed Recs and [REDACTED] Daisy. So, actual Ecosystems work will have to wait

Darius Kilstein (7/29/2020 16:51:49 PDT):

>Oh [REDACTED] is on Daisy now?

[REDACTED] (7/29/2020 16:51:52 PDT):

>yup

Darius Kilstein (7/29/2020 16:51:54 PDT):

>gofddamn it

[REDACTED] (7/29/2020 16:52:04 PDT):

>It's ruined several careers

Darius Kilstein (7/29/2020 16:52:12 PDT):

>It's a social comparison app, fucking get used to it

Darius Kilstein (7/29/2020 16:52:13 PDT):

>lol

[REDACTED] (7/29/2020 16:52:14 PDT):
>But I trust it won't ruin [REDACTED]

[REDACTED] (7/29/2020 16:52:36 PDT):
>We just need to make a fucking decision and put it to bed

[REDACTED] (7/29/2020 16:53:03 PDT):
>Facebook won't even test it, because they get it

[REDACTED] (7/29/2020 16:59:11 PDT):
>I just saw that you were asking how much money directors make

Darius Kilstein (7/29/2020 16:59:19 PDT):
>LOL

Darius Kilstein (7/29/2020 16:59:22 PDT):
>do you know?

[REDACTED] (7/29/2020 16:59:25 PDT):
>(in the QUIP)

[REDACTED] (7/29/2020 16:59:38 PDT):
>It's a fairly standard formula from what I've heard.

[REDACTED] (7/29/2020 17:00:03 PDT):
>Every level you go up, your base salary increases by around 1.2x

[REDACTED] (7/29/2020 17:00:15 PDT):
>And refreshers around 1.7x

[REDACTED] (7/29/2020 17:00:34 PDT):
>and the bonuses increase 5 percentage points

Darius Kilstein (7/29/2020 17:00:52 PDT):
>I assume there's a high chance of additional DE when you become a director too right?

[REDACTED] (7/29/2020 17:01:09 PDT):
>Of course, DE and initial grants mean that salary ranges are huge

Darius Kilstein (7/29/2020 17:01:49 PDT):
>I calculated this will be about 600K difference post-tax for me

Darius Kilstein (7/29/2020 17:01:56 PDT):
>With the following assumptions:

[REDACTED] (7/29/2020 17:02:04 PDT):
>BTW, 50% of DE goes to the same people half after half

Darius Kilstein (7/29/2020 17:02:32 PDT):
>1/ 2 Year to director
>2/ I work for the remaining 4 years after that
>3/ I assumed a 2X rate for refreshers and i assumed a 2X rate on a one-off DE

[REDACTED] (7/29/2020 17:02:37 PDT):
>Wow my math is a bit lower

Darius Kilstein (7/29/2020 17:02:57 PDT):
>I'm talking about realizing all of the refreshers and DE tho

Darius Kilstein (7/29/2020 17:03:10 PDT):
>very rough calculations, could be off

[REDACTED] (7/29/2020 17:04:10 PDT):
>honestly working remotely from a cheaper state with lower taxes and not getting promoted it's not super different

Darius Kilstein (7/29/2020 17:04:31 PDT):
>Ya also it's tastier...mmmmm...idaho potatoes

Darius Kilstein (7/29/2020 17:05:07 PDT):
>Will you get director scope in the reorg?

[REDACTED] (7/29/2020 17:05:28 PDT):
>I think so?

Darius Kilstein (7/29/2020 17:05:40 PDT):

>I mean, we have a pillar lead that is a director already, my working theory is that within a few years it'll be more normal to be a director at the pillar lead level

[REDACTED] (7/29/2020 17:05:44 PDT):
>Definitely closer than in the current situation

[REDACTED] (7/29/2020 17:06:14 PDT):
>I'd be suuuuuper surprised if head of growth DS weren't a dir position soon

Darius Kilstein (7/29/2020 17:06:25 PDT):
>The rate at which [REDACTED] has been promoting [REDACTED], Pillar leads will be CEO's in no time

[REDACTED] (7/29/2020 17:06:40 PDT):
>[REDACTED] and [REDACTED] also have huuuge teams already

[REDACTED] (7/29/2020 17:06:48 PDT):
>LOL

[REDACTED] (7/29/2020 17:07:02 PDT):
>I mean, we'll all be working for him soon

Darius Kilstein (7/29/2020 17:07:18 PDT):
>I think I was in his PSC when he was put up from IC4 to IC5 when I joined 2.5 years go

[REDACTED] (7/29/2020 17:07:31 PDT):
>I was his bootcamp mentor!

Darius Kilstein (7/29/2020 17:07:34 PDT):
>LOL

[REDACTED] (7/29/2020 17:07:50 PDT):
>I'm almost certain he joined as an IC3

Darius Kilstein (7/29/2020 17:16:56 PDT):
>ohmygod that is insane

Darius Kilstein (7/29/2020 17:17:27 PDT):
>its like the last 10 years of my professional career before IG was worth nothing

Darius Kilstein (7/29/2020 17:17:27 PDT):
>lol

[REDACTED] (7/29/2020 17:25:11 PDT):
>Yah

[REDACTED] (7/29/2020 17:25:28 PDT):
>I started the corporate world at 32

[REDACTED] (7/29/2020 17:25:47 PDT):
>Never made more than \$25k a year before that

Darius Kilstein (7/29/2020 17:26:06 PDT):
>omg really

Darius Kilstein (7/29/2020 17:26:09 PDT):
>wow

Darius Kilstein (7/29/2020 17:26:14 PDT):
>crazy

Darius Kilstein (7/29/2020 17:26:24 PDT):
>I been going for a while :P

Darius Kilstein (7/29/2020 17:26:51 PDT):
>was a software eng for 2 years, analyst for 1 at an insurance company, then worked at ebay for 3.5 years then soundcloud for 4 years and now here for 2.5 :P

[REDACTED] (7/29/2020 17:26:52 PDT):
>Never made more than \$25k a year before that

[REDACTED] (7/29/2020 17:26:52 PDT):
>He's almost a director and hasn't turned 30 yet

Darius Kilstein (7/29/2020 17:27:21 PDT):
>Ya I mean I guess its good, if you're performing well why not, i do wonder if he's been artificially inflated though

[REDACTED] (7/29/2020 17:29:09 PDT):

>I think he's absolutely brilliant. Plus right manager and right team. A winning combination.