

AMENDED Exhibit 398

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: Adam Mosseri [/O=THEFACEBOOK/OU=EXTERNAL (FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN=[REDACTED]]
Sent: 4/16/2019 4:16:48 PM
To: Susan Li [REDACTED]; David Ginsberg [REDACTED]
CC: Tom Alison [REDACTED]; Fidji Simo [REDACTED]; [REDACTED]
Subject: Re: Background on Well-Being Contingency HC Ask

Susan, thanks for the update. Unfortunately I don't see us funding this from Instagram any time soon, we recently ran a divestment exercise and are still too tight in a number of places.

Adam

From: Susan Li <[REDACTED]>
Date: Tuesday, April 16, 2019 at 8:55 AM
To: David Ginsberg [REDACTED]
Cc: Adam Mosseri [REDACTED], Tom Alison [REDACTED], Fidji Simo [REDACTED]
Subject: RE: Background on Well-Being Contingency HC Ask

Following up on the review yesterday – this was not funded, in part given the number of open heads (esp. on Blue) at the moment. Having said that, both Mark and Sheryl wanted to emphasize they think this is work worth doing (and consequently reprioritizing other things). I know this isn't a terribly satisfying answer, but we are constrained to 178 ENG heads for the remainder of the year and it's only April, so funding decisions are now far and few between.

From: David Ginsberg
Sent: Monday, April 8, 2019 8:51 PM
To: Mark Zuckerberg <[REDACTED]>
Cc: Susan Li <[REDACTED]>; David Wehner <[REDACTED]>; Sheryl Sandberg <[REDACTED]>; Andrea Besmehn <[REDACTED]>; Fidji Simo <[REDACTED]>; Adam Mosseri <[REDACTED]>; Tom Alison <[REDACTED]>
Subject: Background on Well-Being Contingency HC Ask

PDF attached or text below:

Mark,

As part of the contingency headcount process we are requesting additional headcount to fund the "Well-being 10x" initiative. This headcount will cover both work in the Blue App (17 heads) and Instagram (7 heads). The background, details, and potential trade-offs are below.

[Note: Well-being and subjective well-being refers to people's evaluation of their own lives -- in thoughts and feelings. On IG, their integrity team is also called the Well-Being team. For the purposes of this memo, we are specifically talking about subjective well-being and related areas (e.g. social comparison, loneliness, problematic use) as distinct from integrity.]

Background/Business Context: Over the past few weeks, in response to requests from Chris, Sheryl, Nick and others, the team has developed a plan for how we might go bigger with our work on Well Being. We made good progress on this front in 2018 with our launch of MSI and the "Your time on Facebook/IG" feature. However, we continue to face external scrutiny on Facebook and Instagram's impact on well being, especially around areas of problematic use/addiction and teens.

Current research (internal and external) tells us that despite all the positive effects that FB provides (e.g. meaningful interactions, belonging, social support), there is increasing scientific evidence (particularly in the US, see [here](#) and [here](#)) that the average net effect of FB on people's well-being is slightly negative. The science here is still very early, primarily US based, and relying on self-reporting. There are a lot of limitations and we have a lot to learn, especially around causation vs. correlation.

While we don't know why the net impact is slightly negative, we do know:

- Active interactions with close friends are associated with improvements in well-being, whereas more passive behaviors like scrolling/browsing and watching videos are not. → *These insights, in part, led to our feed ranking change for meaningful social interactions (MSI) last year.*
- Feeling in control of one's experiences in life, including with technology, is associated with more positive psychological effects. → *"Your Time on Facebook/ Instagram" is an example of a feature related to increasing agency and control, and (for those who used it) it led to increased feelings of control and satisfaction with FB time spent.*

We also have deep understanding around **three** negative drivers that occur frequently on FB and impact people's well-being:

1. Problematic use (prevalence: 55% mild, 3.1% severe)
2. Social comparison (prevalence: 40% mild, 5% severe)
3. Loneliness (prevalence: 36% mild, 7% severe)

We believe there is a strong need to increase our investment in these areas to make a meaningful shift over the next year and beyond. We believe we should prioritize the work as follows:

1. Move quickly in the areas we have confidence in our understanding:
 1. **Problematic use:** Given its prevalence and our confidence around product interventions (prominent time controls and goals, night mode, etc), we will tackle this area first.
 2. **Social comparison & Loneliness:** We will build a playbook (product ideas and execution plan) for each of these before moving into execution.
2. Better understand work:
 1. Focus more in depth research on understanding why there is a net negative impact and for whom, establishing a measurement approach at the product level and among the competitive landscape, and a comprehensive and prioritized list of additional areas to focus on.

We have a two-phase vision for this work: in phase 1, we want FB/IG to be "best-in-class" among social media apps, and in phase 2, we want FB/IG to be net positive to well-being (2020 and beyond).

Ask:

Our ask is for **17 HC (6 ENG)** on Blue, and **7 HC (1 ENG)** for IG broken down as follows:

- On Blue, we will accomplish the following with these resources:
 - Build tools/products to address problematic use and establish the longer term strategy in this space, so we become best-in-class among social media apps by ~mid 2020 (+11 HC = 3 Eng, 2 UXR, 1 design, 1 PM, 2 DS, 1 DE, 0.5 CS, 0.5 PMM).
 - Deepen our knowledge and confidence on key areas so we can unblock future work on these topics (e.g., net negative effect, social comparison, loneliness, etc.) and establish operational measurement, specifically establishing the playbooks for social comparison and loneliness by EOY 2019 (+6 HC = 2.5 Eng, 3 UXR, 0.5 DE).
- On IG, we will accomplish the following with these resources:

- Understand one well-being key area (e.g., problematic use) on IG and establish well-being measurement by EOY 2019 with a potential for it to slip into H1 2020, pending hiring (+7 HC = 1 Eng, 2 UXR, 2 DS, 1 DE, 1 PM).

Landscape of Current Heads:

- Funding has been limited so far. On FB, we have a research core and a single PM. Specifically, there are about 11 heads: 6 research, 2 CDS, 1 PM, 1 half time of each design, eng, content, data.
- On IG, we have .2 researcher and no DE/DS/CDS/Design/PMs focused on well-being.
- Due to differences in the FB and IG platforms, their usage, and community member demographics - especially given the larger population of teens on IG - we believe we need to invest in resources to understand well-being on both these platforms (i.e., the learnings aren't always generalizable from platform to platform).
- Without additional investment, we are on a trajectory to deliver exploratory findings and continue our research at a slower pace (and NO product changes).

If had to self-fund, what would trade off and what would be the impact of that shift?

- On Blue, if we had to self-fund, the tradeoffs would be difficult. We could scrape just the eng/design/product (no UXR) to make progress on the product efforts, which would trade this off against Goodwill work, depending on some other decisions we are looking at with that team. We do not recommend this because Goodwill is critical in helping us fix our brand which is also very high priority.
- Since half of the ask is research related, if we had to self fund we could also consider "taxing" the rest of the research teams to each give up a head and move to the well-being team. That would be a difficult option as there are lot of other taxes like that being levied right now (profile+, integrity moves, etc). Additionally that would leave the other 7 roles still unfilled.
- On the IG side, given the integrity deficit already going on, this would remain understaffed for now.