

AMENDED Exhibit 48

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: Karina Newton [/O=THEFACEBOOK/OU=EXTERNAL (FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN=[REDACTED]]
Sent: 7/6/2018 12:24:08 PM
To: [REDACTED]
Subject: Re: For review: Email re partners to [REDACTED]

Looks great! Please add me to the email as well and just made a couple of edits. Also, since the money is partially coming from marketing, I've added the money in as I don't want there to be any surprises in the cost later! Also [REDACTED], I requested edit access to the quip, want to make a couple of little changes (reflected in the edits below).

Karina

Subj: Distribution partners for Parent's Guide

Hi team,

As you know, the policy team has been having conversations with nonprofit and education orgs who we could partner with to distribute our Parent's Guide launching in August. Our aim was to identify one or two top tier partners with significant credibility who could provide feedback on our parent's guide, be a public validator for our efforts, and most importantly, get our materials into the hands of parents, grandparents, and educators at scale.

After lots of discussion and negotiation, we've chosen to partner with the National PTA and Scholastic to tackle parents both directly and through their children's educators. (Note: there will be similar partnerships at the regional level in our FCI countries that we will update you on in a few weeks once they are locked in.)

Both PTA and Scholastic are trusted, respected organizations and have robust national parent and educator networks. The agreements we've worked out include significant website placement, social media promotion, targeted physical distribution, community activations, and post-campaign surveys.

We'll be holding roundtables in NY & London this month to get feedback on our guide with the above organizations – as well as with additional safety/well-being policy partners, academics, and parent bloggers.

Below is a tl;dr on the partnerships, and please let us know if you have any flags or questions!

Best,

[REDACTED]

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The Partnership TL;DR

QUIP with full details: <https://fb.quip.com/yPGKAxpT85ml>

PTA

- WHY: PTA uniquely sits at the intersection of family, school, and community. If you want to connect with parents at scale, you work with the PTA.
- NETWORK: 16.2 million families across the U.S.
- COST: \$110k
- WHAT WE GET:
 - Official partner for PTA's first-ever Back to School Week campaign
 - Dedicated Back To School page housing Instagram-supplied educational content
 - Email blast to 16K PTA presidents at middle and high schools nationwide
 - Email blast to ~150K PTA members
 - Two community activations around Back to School Week

Scholastic

- WHY: Scholastic gives us the ability to win educators and the school community, creating a ripple effect to allow us to win parents and families. Educators and schools don't feel like they have enough information to help teens in their schools; a Scholastic partnership helps fix that.
- DATA:
 - More than half of U.S. school principals say they're extremely concerned about children's use of social media outside of school, but just 14 percent describe themselves as "very prepared" to help students use social media responsibly. ([Education Week](#), April 2018)
 - 98% of teachers feel confident about sharing information that they receive from Scholastic with parents of their students
- NETWORK: 115,000 schools > 3.8 million educators > 54 million students > 78 million parents/caregivers
- COST: \$135k
- WHAT WE GET:
 - Physical distribution to 20,000 classrooms across the U.S. (Reach: 20,000 teachers / 600,000 students/families assuming 30 students per class)
 - Educational destination on Scholastic.com
 - E-newsletter integration in Scholastic's Teacher (250K+ subscribers) and Parent (150K+ subscribers) e-Newsletters

From: [REDACTED]
Date: Thursday, July 5, 2018 at 6:59 PM
To: [REDACTED], Karina Newton [REDACTED]
Subject: Re: For review: Email re partners to [REDACTED]

+Karina

This looks excellent. Small edits in red below. @Karina Newton – let us know if this is good to ship to [REDACTED] and [REDACTED] with [REDACTED] and [REDACTED] cc'd.

Thank you!

From: [REDACTED]
Date: Thursday, July 5, 2018 at 10:31 AM
To: [REDACTED]
Subject: For review: Email re partners to [REDACTED]

Let me know what you think. Tried to keep it as short as possible, but recognize that it is still a touch lengthy. I could remove the "DATA" section from the Scholastic breakdown if not useful to making our case.

Thx!

Subj: Policy distribution partners for parent program material distribution

Hi team,

As part of our parents campaign, the policy team has been leading conversations with various nonprofit and education organizations who we could partner with to distribute our safety materials. The aim was to identify ~~one or~~ two top partners who could provide feedback on our parents guide, be a public validator for our efforts, and get our materials into the hands of parents, grandparents, and educators.

After lots of discussion and negotiation, we've chosen to partner with the National PTA and Scholastic to tackle parents both directly and through their children's educators. (Note: there will be similar partnerships ~~at the regional level~~ in our FCI markets that we will update you on in a few weeks once those are locked in.)

Both PTA and Scholastic are trusted, respected organizations that transcend partisanship and have robust parent and educator networks. The agreements we've worked out include significant website placement, social media promotion, targeted physical distribution, community activations, and post-campaign surveys.

We'll be holding roundtables in NY & London this month to get feedback on our parents guide with the above organizations, other safety/well-being partners, academics, and mommy/daddy bloggers.

Have a look at the partnership TDLR; below, and let us know if you have any flags or questions!

Best,

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The Partnership TLDR:

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