

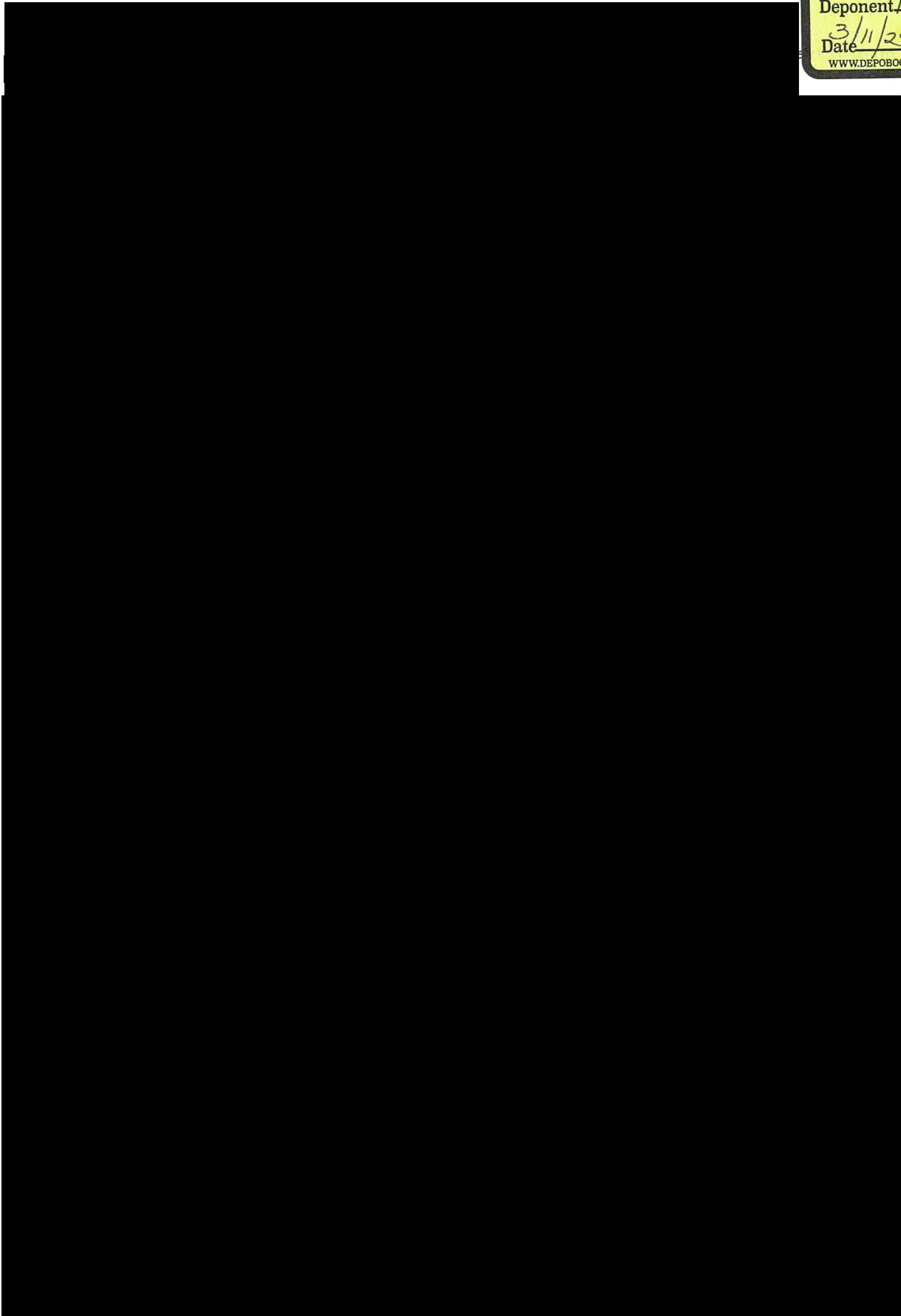
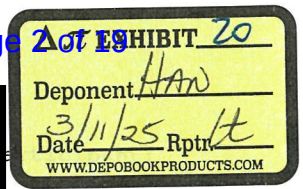
AMENDED Exhibit 498

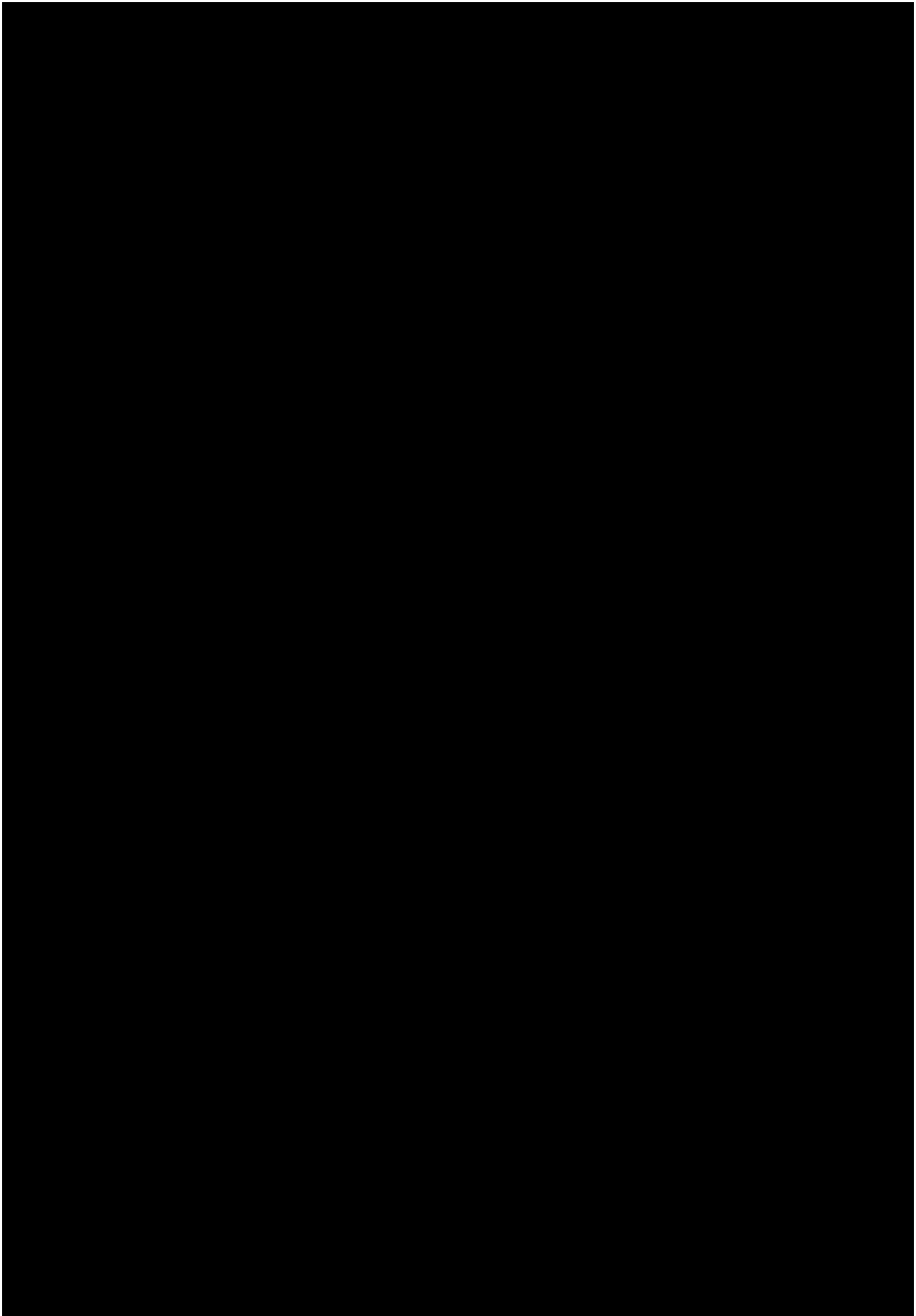
PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

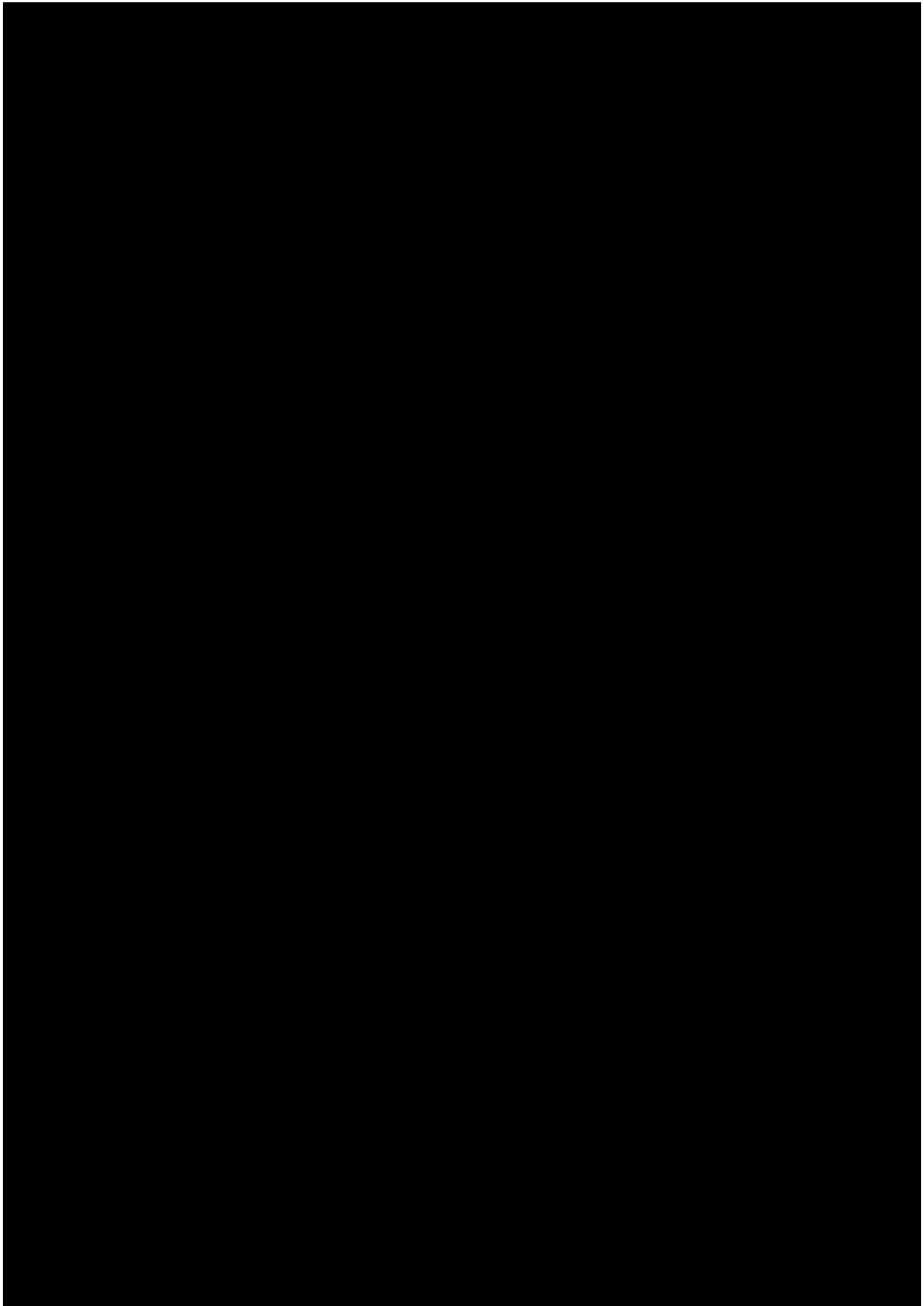
Case No.: 4:22-md-03047-YGR

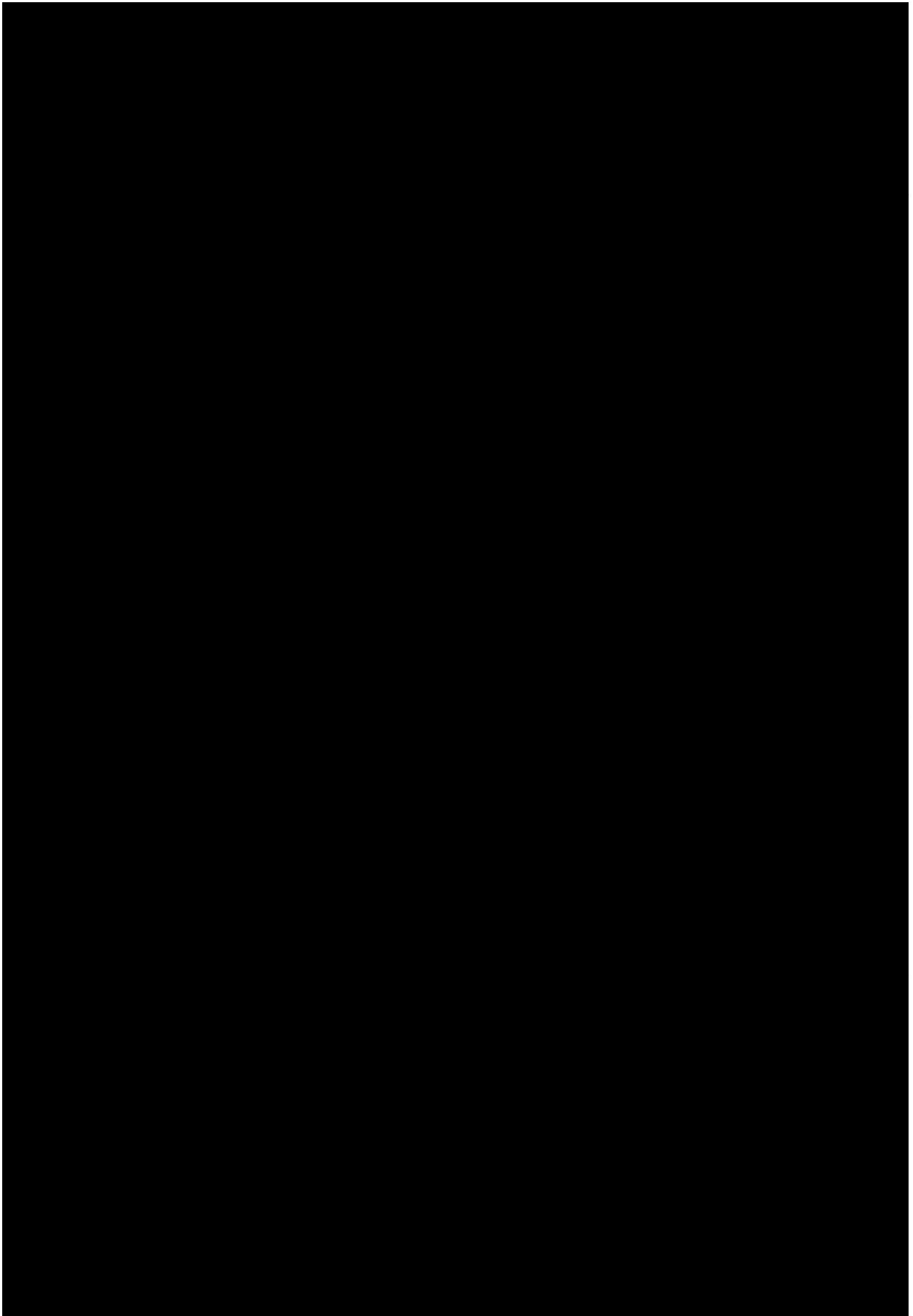
MDL No. 3047

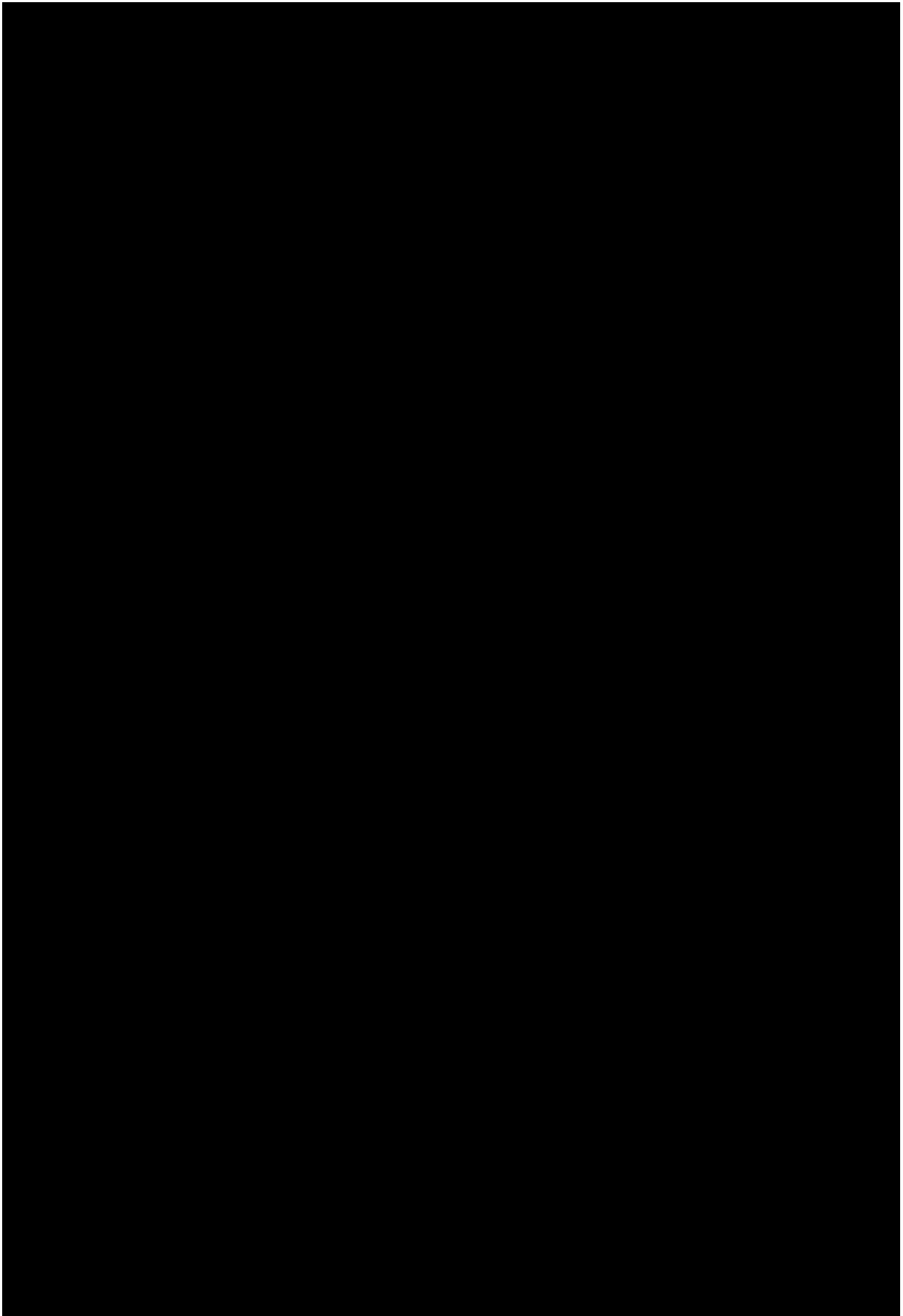
In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

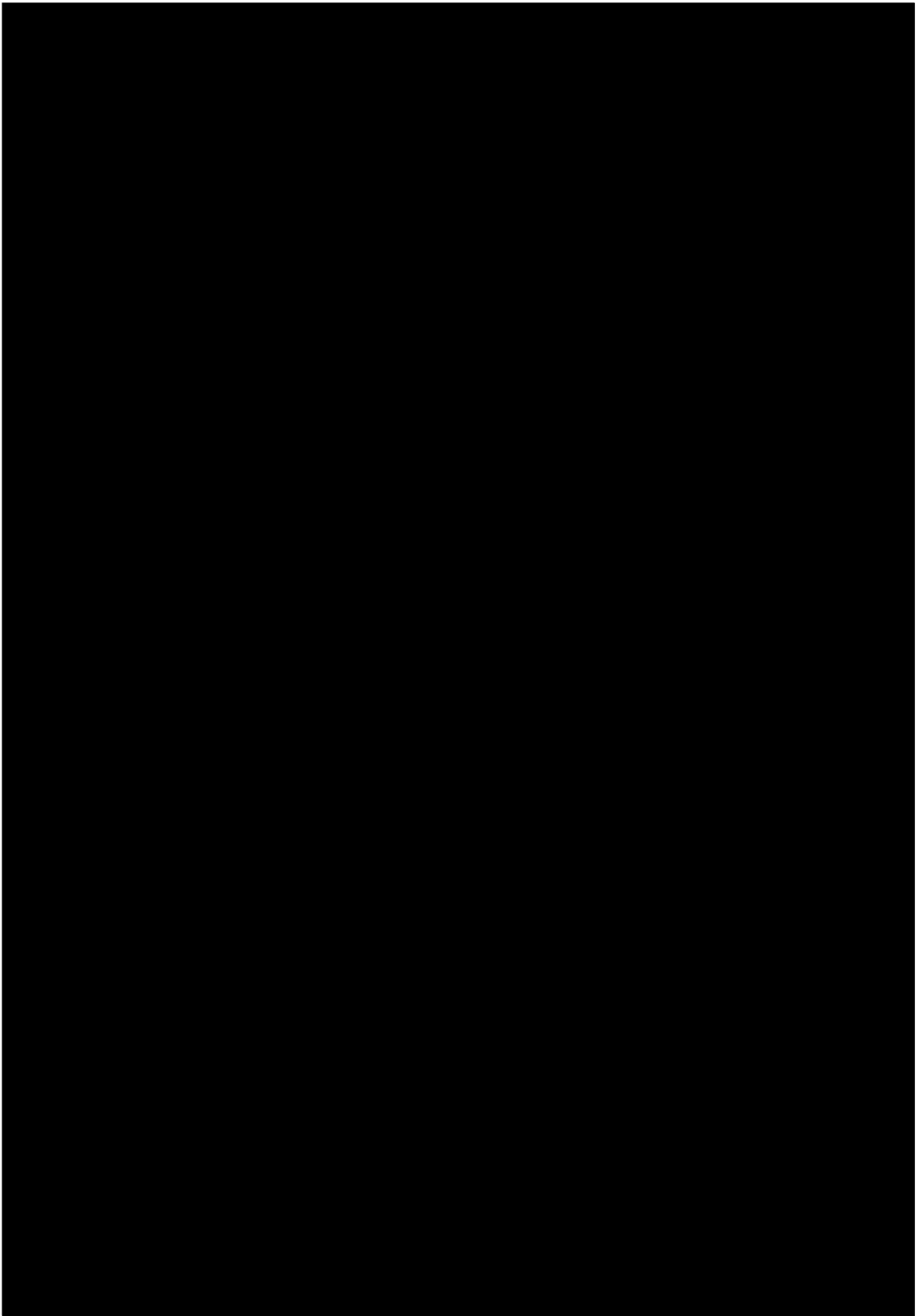


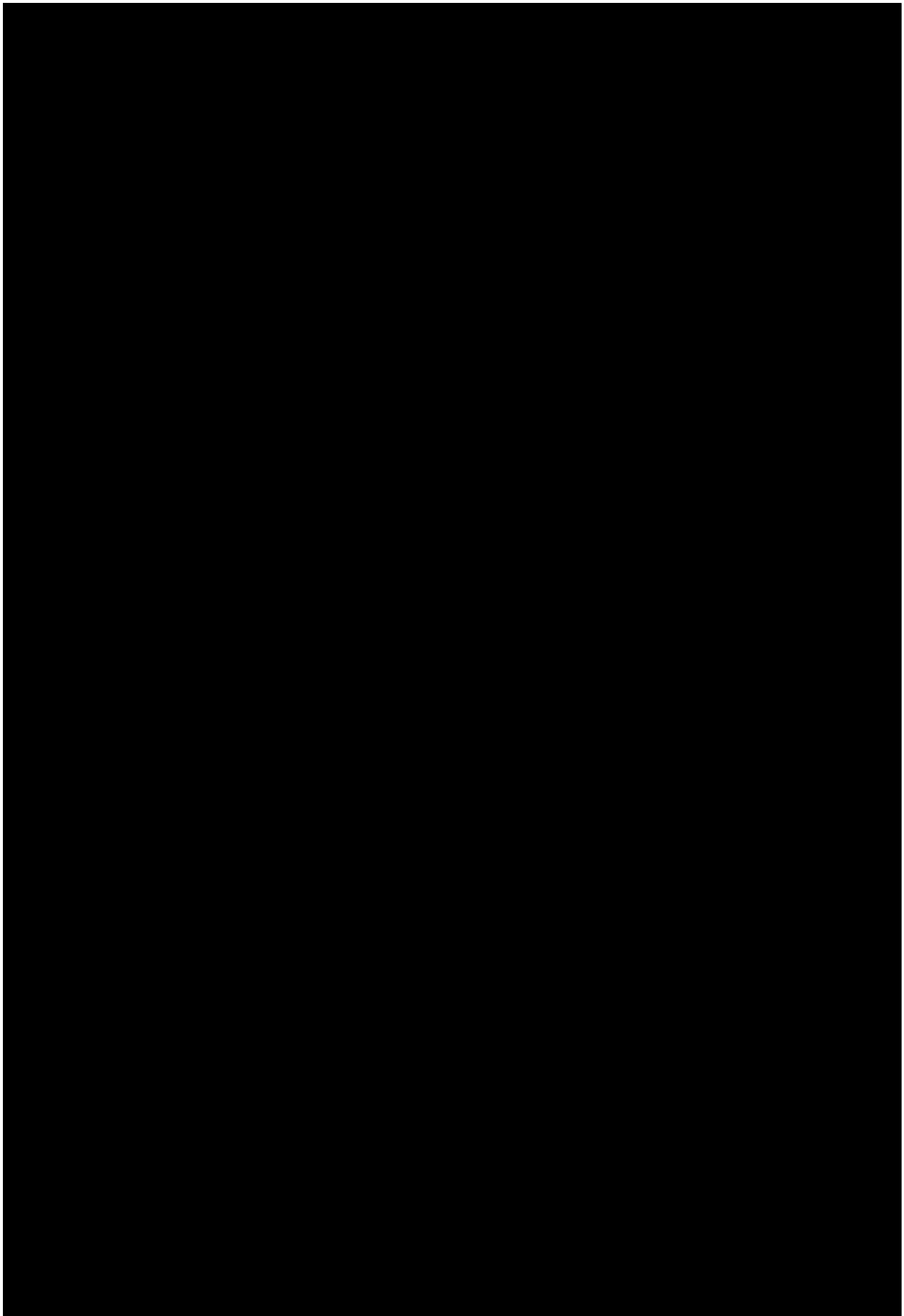


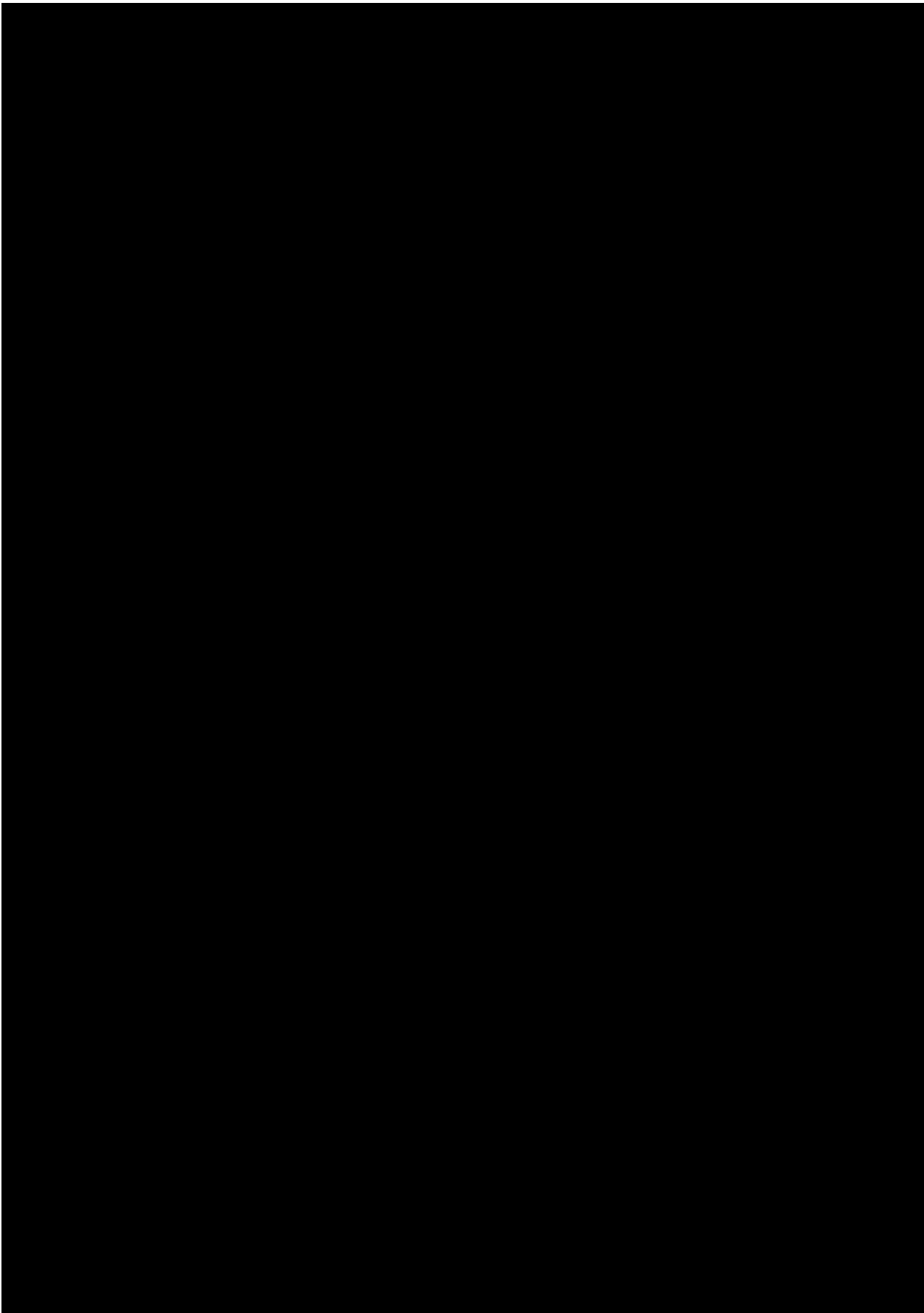


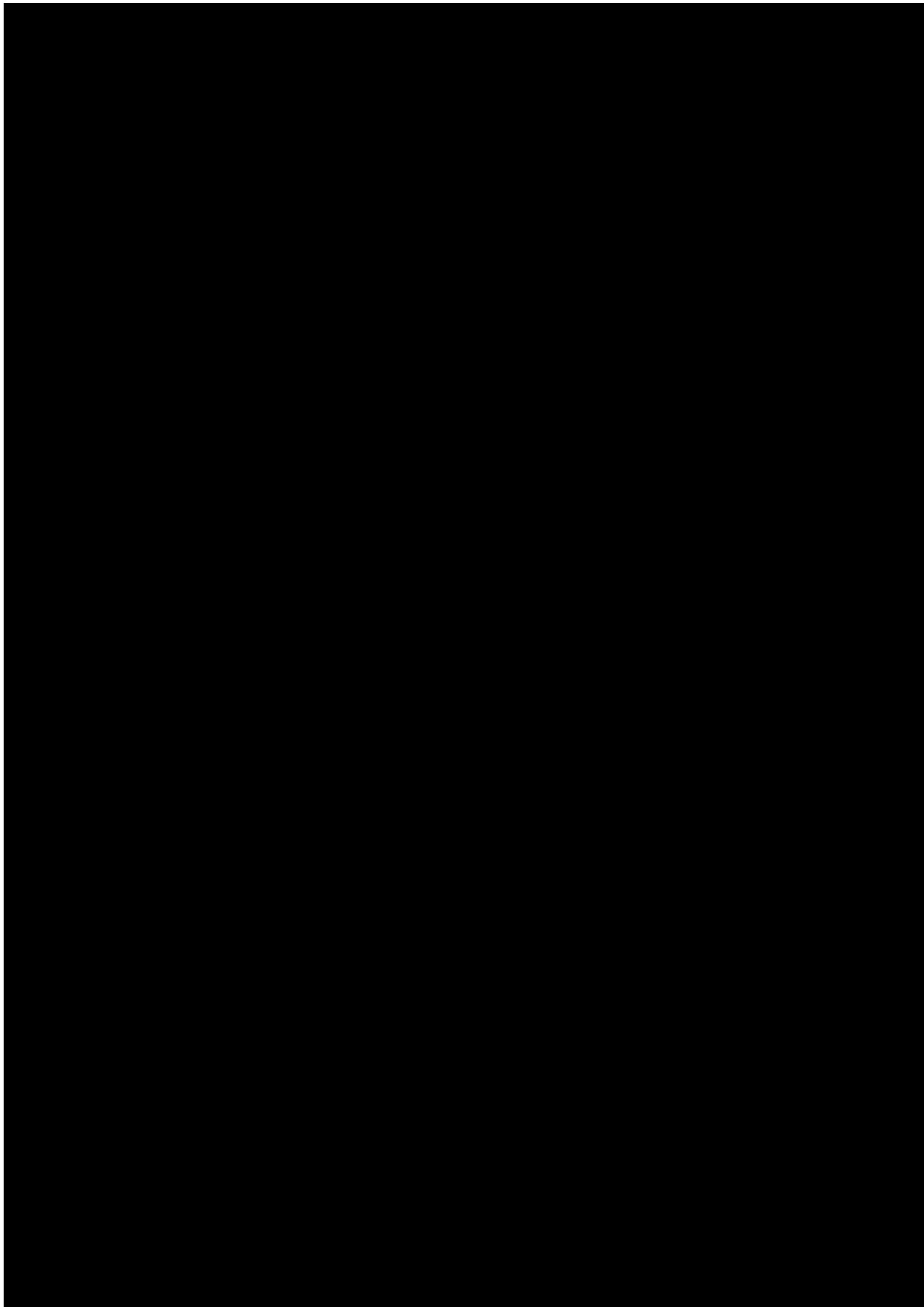


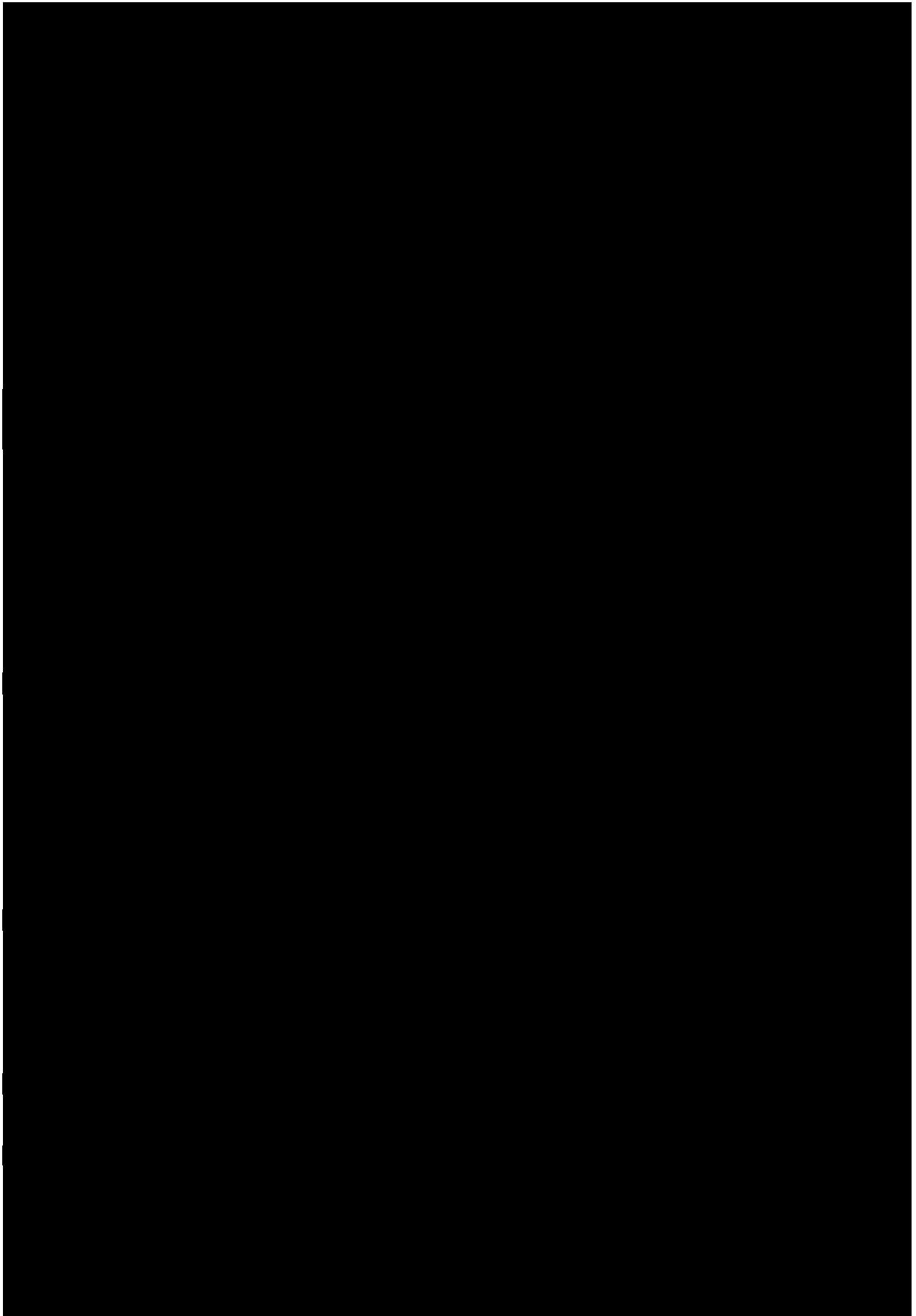


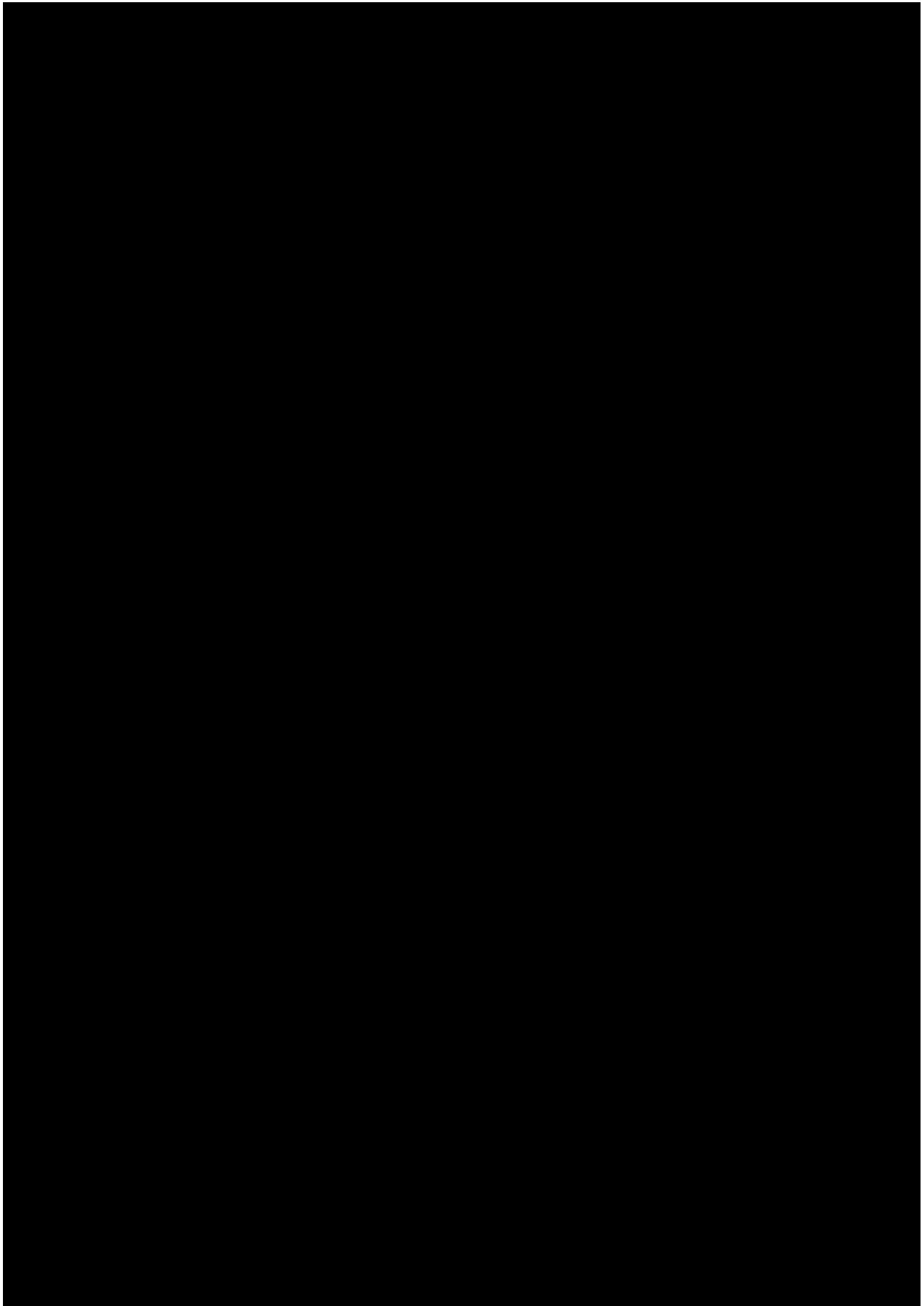












message: (And thanks for working with us on this on a Friday night!)", "Eric Han", ""

"7/17/2021 10:49 AM", "Eric Han", "date and time: 2021-07-17, 10:49:33 participant: Eric Han message: I'm sorry you had to hop on during your time off [è;°] Hope you get some rest!", "Eric Han", ""

"7/21/2021 12:41 AM", "Eric Han", "date and time: 2021-07-21, 00:41:09 participant: Eric Han message: From IG -- giving users more choice about what they see re: sensitive content: <https://about.instagram.com/blog/announcements/introducing-sensitive-content-control>", "Eric Han", ""

"7/21/2021 1:37 AM", "Eric Han", "date and time: 2021-07-21, 01:37:37 participant: message: Yeah, this is interesting. I predict approximately zero usage - anything opt in gets very low usage. I'm more of a fan of warning screen interstitials, although I'm told that for some reason (which I don't believe) it would be too technically challenging. I do think there's something important here about giving users choice, but I don't think the Instagram design is right.", "Eric Han", ""

"7/21/2021 2:33 AM", "Eric Han", "date and time: 2021-07-21, 02:33:24 participant: Eric Han message: Yeah, user-choice-as-a-feature seems to be more of a complement to detection strategies. I do believe it completes a more defensible narrative -- specifically, "We do X to filter out, remove, or deamplify violative/bad content *and* we provide users the choice to manage their own experience." If you only do the former, then there are accusations of censorship and being paternalistic. If you only do the latter, then we're accused of not doing enough. This is similar to what Tracy is doing with Content Classification. I think it's a good mix of providing compulsory interventions for minors (e.g., Kids, Restricted Mode), while also providing opt-in for users who may want to use it (e.g., Family Pairing)", "Eric Han", ""

"8/4/2021 3:12 AM", "Eric Han", "date and time: 2021-08-04, 03:12:08 participant: Eric Han message: [other message type] MessageType_MERGE_FORWARD", "Eric Han", ""

"8/4/2021 3:12 AM", "Eric Han", "date and time: 2021-08-04, 03:12:09 participant: Eric Han message: Heads up. This conversation is happening in a broad Lark group relating to Live. Can you check with folks on your team who are either partially or fully read in to ensure confidentiality? There are folks in the group who are not read in and we're getting questions about it", "Eric Han", ""

"8/4/2021 4:12 AM", "Eric Han", "date and time: 2021-08-04, 04:12:43 participant: message: [other message type] MessageType_MERGE_FORWARD", "Eric Han", ""

"8/4/2021 4:13 AM", "Eric Han", "date and time: 2021-08-04, 04:13:07 participant: message: Yes, I'll check. But I think this cat was out of the bag even before people on my team were being read in.", "Eric Han", ""

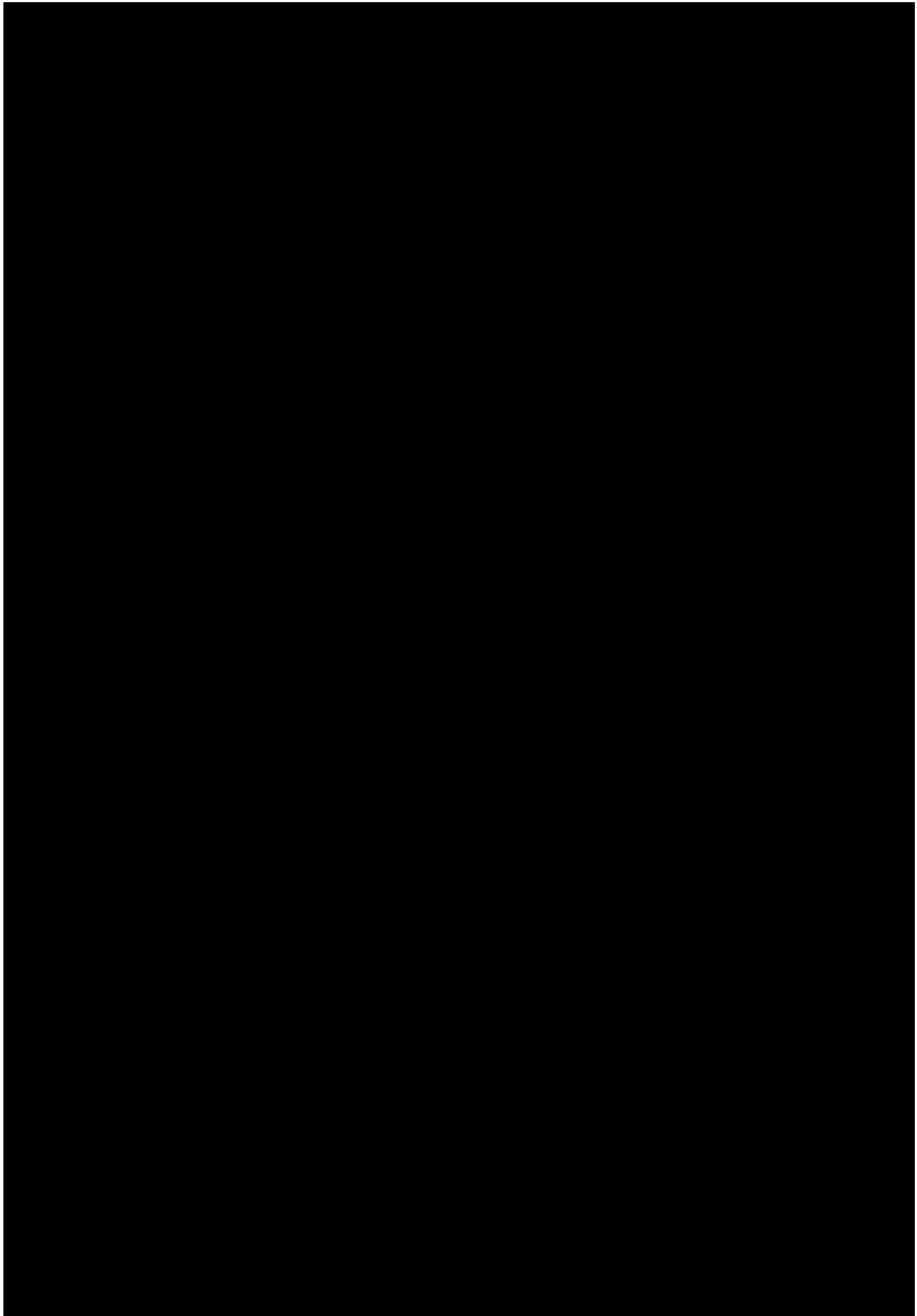
"8/4/2021 4:15 AM", "Eric Han", "date and time: 2021-08-04, 04:15:16 participant: Eric Han message: Thanks. Yes, there are quite a few folks that know. Just want to be careful with how openly we're talking about this in public groups. Have been telling folks that are partially or fully read in to keep confidentiality as a priority -- specifically, (1) assume folks are not read into the project and (2) refrain from discussing in public forums ", "Eric Han", ""

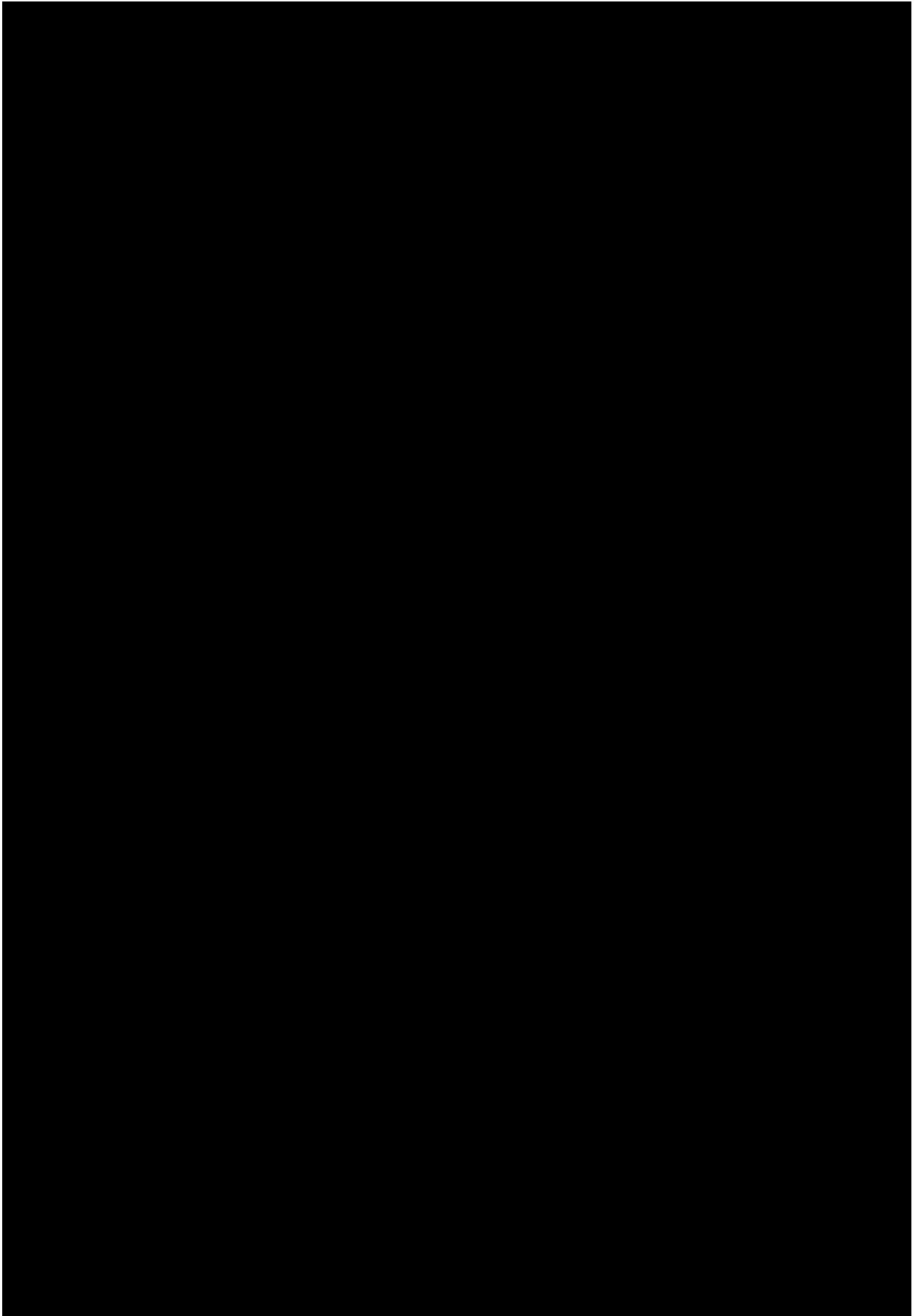
"8/4/2021 4:17 AM", "Eric Han", "date and time: 2021-08-04, 04:17:00 participant: message: Yes, completely agree", "Eric Han", ""

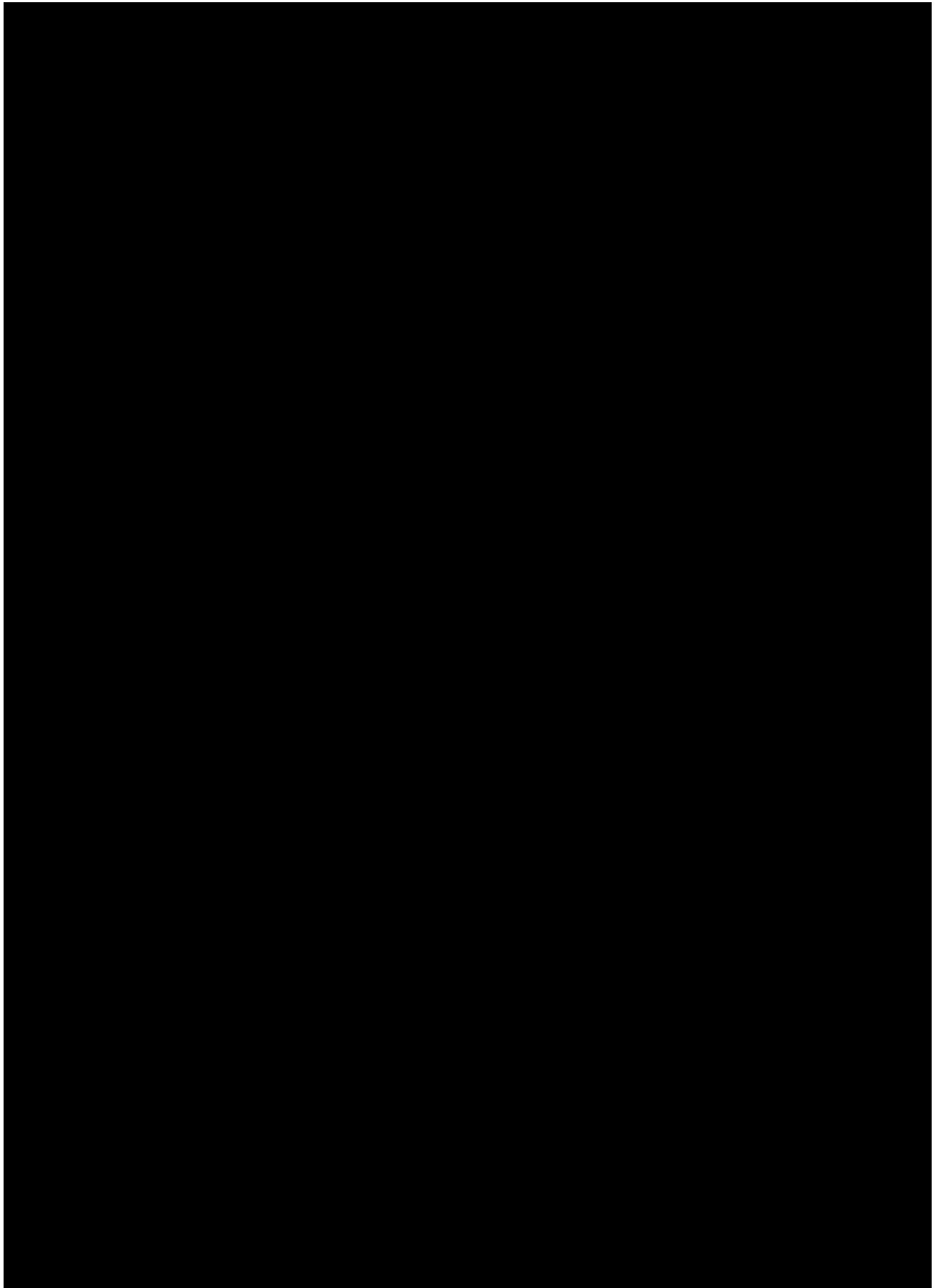
"8/4/2021 4:18 AM", "Eric Han", "date and time: 2021-08-04, 04:18:06 participant: message: But I also think it may be time to reconsider our approach (so, I'll emphasize confidentiality as long as that is the goal -- but I think it's time to reconsider whether this is viable given the size of the project. And I think that uncertainty is more damaging than anything else, so at a certain point, it's better to be open.)", "Eric Han", ""

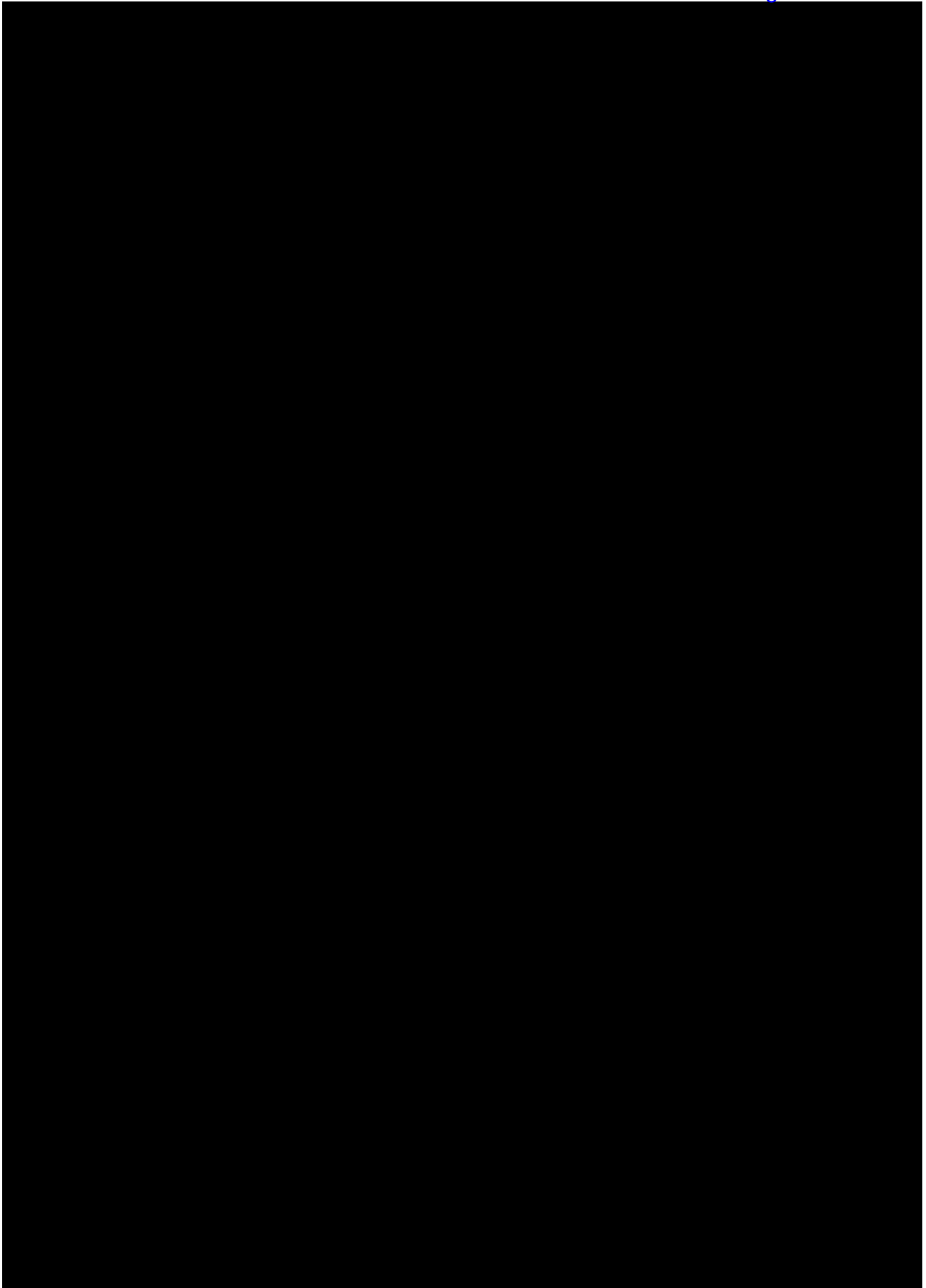
"8/4/2021 4:21 AM", "Eric Han", "date and time: 2021-08-04, 04:21:37 participant: message: I'm going through this list -- there are a LOT of people on my team listed as "Approved"", "Eric Han", ""

"8/4/2021 4:21 AM", "Eric Han", "date and time: 2021-08-04, 04:21:38 participant:









DOCUMENT METADATA

