

AMENDED Exhibit 56

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=[REDACTED]]
Sent: 5/11/2023 12:16:08 AM
To: [REDACTED]
Subject: Message summary [{"otherUserFbld":null,"threadFbld":5985057554937830}]

[REDACTED] (5/10/2023 13:04:25 PDT):

>Hi both! Sharing a couple of updates on the YWB campaigns. I added a column in our partner selection framework to highlight what influencers (pediatricians, educators etc) the partner has ties to, per the feedback from leads. Can you help me fill this in for your partners?
<https://docs.google.com/document/d/1q67Ys1KQ8UHRQ2ZCDWwJzx1B-BmarRD6IJBzjXuVgDM/edit#heading=h.o7ficpvjxjfg>

>Also I reached out to [REDACTED] about Common Sense Education and she didn't think they would be open to engaging on this unfortunately, given they've been critical of some of our youth launches in RL very recently. I've removed CSM from our shortlist and noted this in the larger partner selection grid. So that would leave AAP, NAMI, and either Child Mind Institute or Born This Way Foundation. Education Partnerships also suggested that Scholastic might be a good fit, although they generally focus on parents of younger children (elementary school, as opposed to middle school/high school).

[REDACTED] (5/10/2023 14:15:54 PDT):

>An yes, we worked with Scholastic in a big way for our last IG parents' push in 2018. They were excellent partners, but it's been a while since I've connected and IIRC, they primarily reach educators

[REDACTED] (5/10/2023 14:17:08 PDT):

>Noted on CSM Edu. Makes sense. One day we'll get to work with them again!

[REDACTED] (5/10/2023 14:17:30 PDT):

>I think I'm going to add scholastic and maybe, if possible common sense education as a separate path, where we won't engage them specifically for these campaigns, but may see if they're open to consulting/giving feedback on this work and potentially we can tee them up down the line

[REDACTED] (5/10/2023 14:17:47 PDT):

>I ran into Sam and Julia at lunch yesterday in DC, and after chatting with them, I think we still have a slight disconnect on timing, creative expectations, etc -- particularly if these are partners who don't already use our ads platform (this is confirmed the case for AAP).

[REDACTED] (5/10/2023 14:19:08 PDT):

>I think we may, as a first step, want to open the door for casual chats with some of these partners to understand 1) what - if any - programs and/or creative they already have in the can, 2) what they have coming down the pipe that is connected to these topics

[REDACTED] (5/10/2023 14:20:59 PDT):

>I think that makes sense. I know that [REDACTED] and [REDACTED] are concerned on timing and resourcing and at the moment I think all the partners we've highlighted are in the Book of Business, but this is also why I think it will be helpful to keep it to a smaller number of partners and also see where we can potentially align to work they're already doing

[REDACTED] (5/10/2023 14:23:35 PDT):

>Totally agree. I just want us to be able to properly manage expectations with leadership (and transparently, whether it's worth kicking partner comms off ahead of May layoff in case we thrash partners about with unforeseen handoffs)

[REDACTED] (5/10/2023 14:26:04 PDT):

>Wonder if it makes sense to 1) shift partner outreach to w/o June 5 to account for May swirl, and 2) shift campaign launch back to late August / September to align with Back to School timelines?

[REDACTED] (5/10/2023 14:28:49 PDT):

>Agree on both counts August/Sept works for the campaigns. We're just trying to ensure we wrap them before the holidays kick off

[REDACTED] (5/10/2023 15:34:40 PDT):

>Thank you so much for the update on partners, [REDACTED]! Happy to help fill in your grid. AAP, NAMI, and either CMI or BTWF sound great to me.

>
>@silent

[REDACTED] (5/10/2023 15:35:18 PDT):

>@silent Love this idea

[REDACTED] (5/10/2023 15:41:03 PDT):

>@silent Also thanks for flagging the lift on campaigns with new partners - I definitely agree, given what I have observed from [REDACTED] past campaigns!

>

>I think particularly with AAP we will need to invest more time to nurture the relationship. NAMI, BTWF, and CMI are all thankfully in GSI NORAM's book of business.

[REDACTED] (5/10/2023 16:39:17 PDT):

>this is my follow up email to SIP leads, in case you want to have a look before I send later tonight
https://docs.google.com/document/d/12lo7I_u0NgGC-X5V1xxnU25EW856dOKFBvpMvMkwVNg/edit?usp=sharing

[REDACTED] (5/10/2023 16:39:42 PDT):

i did my best to capture the influencer piece for each of these partners but let me know if i have anything wrong

[REDACTED] (5/10/2023 17:08:55 PDT):

>Your email looks great to me!

[REDACTED] (5/10/2023 17:11:26 PDT):

>thanks! will copy you both on the follow up email

[REDACTED] (5/10/2023 17:13:02 PDT):

>in the meantime, if you can help me fill out the rest of the partner selection grid with the influencer criteria (doctor/educator), that would be amazing -- can be tomorrow, just want to show our work and how we landed on these 4 partners

[REDACTED] (5/10/2023 17:16:08 PDT):

>Yes, definitely! Filling it in now 😊 @silent