

AMENDED Exhibit 58

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: Antigone Davis [/O=THEFACEBOOK/OU=EXTERNAL (FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN=[REDACTED]]
Sent: 7/28/2017 3:51:11 AM
To: [REDACTED]
Subject: Re: Digital Citizenship at Miami-Dade County Public Schools
Attachments: image001.png; image002.png; image003.png; image004.png; image005.png; image006.png; image007.png; image008.png

Perfect! Thanks

From: [REDACTED]
Date: Thursday, July 27, 2017 at 10:25 AM
To: Antigone Davis [REDACTED]
Subject: FW: Digital Citizenship at Miami-Dade County Public Schools

Antigone! I have copied you on the calendar invitation in case you wanted to join the call. But I can take this forward from here if you'd rather not. 😊

From: "LANDMAN, DENISE" <dlandman@dadeschools.net>
Date: Thursday, July 27, 2017 at 6:24 AM
To: [REDACTED] Antigone Davis
Cc: "Lopez, Vanessa" <288182@dadeschools.net>
Subject: RE: Digital Citizenship at Miami-Dade County Public Schools

Hi [REDACTED]
Thanks for getting back to me. We are available on Monday or Tuesday afternoon anytime after 1 p.m. EST.
Let us know what works best for you.

We look forward to discussing this great opportunity to partner together.
Regards,

Denise Landman

Executive Director of External Communications
Strategic Educational Marketing, Office of Communications
Miami-Dade County Public Schools
1450 N.E. Second Avenue
Miami, Florida 33132
305-995-1126
dlandman@dadeschools.net



From: [REDACTED]
Sent: Thursday, July 27, 2017 12:39 AM
To: LANDMAN, DENISE <dlandman@dadeschools.net>; [REDACTED] Antigone Davis
[REDACTED]

Cc: Lopez, Vanessa <288182@dadeschools.net>

Subject: Re: Digital Citizenship at Miami-Dade County Public Schools

Dear Denise,

Thank you for your email and following up. I have included a broad program outline below. Could we possibly speak next week to discuss this further? I am available on Monday, Tuesday and Thursday.

Thank you,
[REDACTED]

Goal:

Create awareness about responsible use of social media among students at Miami-Dade County Public Schools
Focus on building skills such as empathy, resilience, critical thinking and bridging the online / offline divide

Program outline:

Timeline: August to December 2017

Concept:

- Schools will nominate Ambassadors to participate in a day long workshop on online safety
- Ambassadors will pledge to pay it forward and conduct trainings in their schools and communities
- Schools will participate in a safety competition (draft a safety charter for their school, video competition sharing safety tips for peers, poster making competition to share online safety tips and best practices, or bots for online safety)
- Students can submit entries as a post in a closed public group.
- Top 30 posts with maximum likes and comments will then be judged by a jury comprising representatives from Miami-Dade County Public Schools and Facebook, and
- Top three will be showcased on the Facebook Safety Page receive prizes (iPads or iPods TBC)

Roles and responsibilities:

- Facebook to develop the training in consultation with and provide facilitators to the Miami-Dade County Public Schools
- Miami-Dade County Public Schools to convene students and host the day-long training presented by Facebook
- Miami-Dade County Public Schools to publicize competition among school students
- Miami-Dade County Public Schools to administer safety competition on the ground
- Facebook to coordinate submissions on the platform (groups / Pages)
- Facebook and Miami-Dade County Public Schools to coordinate judging and jury process
- Facebook and Miami-Dade County Public Schools to announce winners
- Facebook to provide prizes

From: "LANDMAN, DENISE" <dlandman@dadeschools.net>

Date: Tuesday, July 18, 2017 at 10:01 AM

To: [REDACTED] Antigone Davis [REDACTED]

Cc: [REDACTED] "Lopez, Vanessa" <288182@dadeschools.net>

Subject: RE: Digital Citizenship at Miami-Dade County Public Schools

Good afternoon,

We wanted to follow-up on the discussion we had on June 16 about a pilot program, such as a video contest, to create awareness about responsible use of social media. Please let us know if you have been able to craft the proposal you mentioned you would put together.

Thank you,

Denise Landman

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From: LANDMAN, DENISE
Sent: Tuesday, June 13, 2017 12:18 PM
To: [REDACTED] Antigone Davis [REDACTED]
Cc: [REDACTED] Lopez, Vanessa <288182@dadeschools.net>
Subject: RE: Digital Citizenship at Miami-Dade County Public Schools

Let's do Friday at 4 p.m.
Thank you,

Denise Landman

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From: [REDACTED]
Sent: Tuesday, June 13, 2017 11:42 AM
To: Antigone Davis [REDACTED] LANDMAN, DENISE <dlandman@dadeschools.net>
Cc: [REDACTED] Lopez, Vanessa <288182@dadeschools.net>
Subject: Re: Digital Citizenship at Miami-Dade County Public Schools

Hi, all

Update on Antigone's schedule. I had already scheduled something else for the 2pm slot on Friday. She's still available at 4pm ET or we can look at future dates.

Thanks,
[REDACTED]

From: Antigone Davis
Sent: Tuesday, June 13, 2017 9:00:46 AM
To: LANDMAN, DENISE
Cc: [REDACTED] Lopez, Vanessa
Subject: Re: Digital Citizenship at Miami-Dade County Public Schools

I can do 2 to 2:30 or a full hour at 4.

On Jun 13, 2017, at 8:34 AM, LANDMAN, DENISE <dlandman@dadeschools.net> wrote:

Friday afternoon works for me. How is 2 p.m.?

Denise Landman

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Strategic Educational Marketing, Office of Communications
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From: Antigone Davis [REDACTED]
Sent: Tuesday, June 13, 2017 5:16 AM
To: LANDMAN, DENISE <dlandman@dadeschools.net>
Cc: GONZALEZ-DIEGO, DAISY R <DGONZALEZDIEGO@dadeschools.net>; [REDACTED]
[REDACTED]
Subject: Re: Digital Citizenship at Miami-Dade County Public Schools

Hi Denise, I am in Austin on Thursday. Maybe Friday? I have copied my colleague [REDACTED] so she can help us find a time.

From: "LANDMAN, DENISE" <dlandman@dadeschools.net>
Date: Monday, June 12, 2017 at 1:18 PM
To: Antigone Davis [REDACTED]
Cc: "GONZALEZ-DIEGO, DAISY R" <DGONZALEZDIEGO@dadeschools.net>, [REDACTED]
[REDACTED]
Subject: RE: Digital Citizenship at Miami-Dade County Public Schools

Yes, absolutely, let me know. How is Thursday morning?

Denise Landman

Executive Director of External Communications
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From: Antigone Davis [REDACTED]
Sent: Monday, June 12, 2017 12:53 PM
To: LANDMAN, DENISE <dlandman@dadeschools.net>
Cc: GONZALEZ-DIEGO, DAISY R <DGONZALEZDIEGO@dadeschools.net>; [REDACTED]
Subject: Re: Digital Citizenship at Miami-Dade County Public Schools

Hi Denise,

We would love to come up with some projects and to work with you. Would it work for you, me and my head of safety policy programs to get on a call this week?

From: "LANDMAN, DENISE" <dlandman@dadeschools.net>
Date: Monday, June 12, 2017 at 12:39 PM
To: Antigone Davis [REDACTED]
Cc: "GONZALEZ-DIEGO, DAISY R" <DGONZALEZDIEGO@dadeschools.net>
Subject: RE: Digital Citizenship at Miami-Dade County Public Schools

Hi Antigone,
I hope all is well. I wanted to follow up on the initial e-mail I sent to you on March 28. Please let us know if we can work together on some of these items and maybe look at planning a media event for next school year.
Thank you,

Denise Landman

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<image019.png><image020.png><image021.png><image022.png>

From: LANDMAN, DENISE
Sent: Tuesday, April 18, 2017 3:09 PM
To: [REDACTED]
Cc: GONZALEZ-DIEGO, DAISY R <DGONZALEZDIEGO@dadeschools.net>
Subject: RE: Digital Citizenship at Miami-Dade County Public Schools

Hi Antigone,
Just wanted to follow up on the e-mail from below, to ensure you had received it.
We look forward to hearing from you.
Thanks,

Denise Landman

Executive Director
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From: LANDMAN, DENISE
Sent: Tuesday, March 28, 2017 10:34 AM
To: [REDACTED]
Cc: GONZALEZ-DIEGO, DAISY R
Subject: Digital Citizenship at Miami-Dade County Public Schools

Hi Antigone,

Sorry for the delay. Attached please find several documents we have put together to promote digital citizenship. The first one is our Top Ten Tips (How to Protecting Your Online Reputation). The second image is a comprehensive list of the different ways we did outreach on this topic.

Below please find our ideas for enhancing outreach on responsible use of social media.

Awareness/Outreach Campaign Recommendations

- 1) Develop and implement a national TV, radio, and social media campaign. The campaign should include 60-second videos/PSAs featuring celebrities and prominent individuals highlighting social media safety. A targeted approach should be utilized accordingly, i.e., Disney/Nickelodeon-type celebrities for kids, athletes for teens, actors/singers for adults.
- 2) Require new social media users to watch a 1-2 minute video on social media safety rather than simply accepting the terms of agreement. Videos should be developed for different age groups – kids/teens, adults, elderly. Designate a day each year as “National Social Media Safety Day” and have current social media users watch video as well (Social Media Day is on June 30th).
- 3) Provide existing academic resources to educators in public school systems to assist in the development of a curriculum for social media safety. Work with M-DCPS educators to develop program that could be used across the nation.

In addition, I'm including links to the winning videos of our #MDCPSPostsPositive video contest. We asked schools to create videos showcasing what it means to post positive.

<https://twitter.com/MLECJaguars/status/825073249981693952>

<https://twitter.com/LeewoodK8/status/822443051960434688>

https://twitter.com/glades_gators/status/825040918776578048

<https://twitter.com/MarineEchoes/status/825031925458952195>

Please let us know about a potential media event highlighting a student using social media responsibly. We'd love to have Facebook representatives visit one of our schools.

Let us know if you have any questions and what we can do to work together to accomplish these goals.

Thanks,

Denise Landman

Executive Director
Strategic Educational Marketing, Office of Communications
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