

AMENDED Exhibit 64

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



Facebook & Common Sense Education Teacher Institute Partnership Opportunity

Become a national leader by equipping educators to enable kids to be strong digital learners and citizens.

Facebook is committed to enabling all kids to be strong digital citizens and learners. By partnering with Common Sense to deliver Teacher Institutes covering digital citizenship and learning, teachers will build their capacity to deliver high quality instruction to all learners.

A partnership with Common Sense on Teacher Institutes will achieve the following:

1. Position Facebook to equip and empower educators with guidance, resources and tools to harness technology for learning and life
2. Enable Facebook to respond to the rapidly changing landscape and focus each institute on important areas like Fake News or Cyber-bullying
3. Position Facebook as a thought-partner taking an important stance on key issues affecting youth in today's digital media landscape

Expanding and Enhancing Common Sense Education's Teacher Institutes

Digital media and technology hold great promise for transforming K-12 education, yet successfully implementing digital learning initiatives can be challenging. Difficulties abound, ranging from behavioral and social issues -- like cyberbullying, digital drama, evaluating credibility, and privacy violations-- to teachers with limited skills and confidence to enrich student learning with technology. Moreover, schools face the additional struggle of evaluating whether the digital tools selected by teachers protect the privacy of students' data.

Common Sense Education is solving these challenges with membership in over 70,000 US schools and representing 500,000 educators. We provide K-12 educators and schools digital citizenship and learning programs that help kids harness the power of digital media for learning and life. Common Sense Education helps educators navigate these issues by providing professional development and recognizing their learning achievements.

Our Teacher Institutes are on the ground professional development and networking opportunities for classroom teachers, librarians, technology coordinators, and other support roles that provide educators with strong digital citizenship and digital teaching skills to achieve the following goals:

1. Build both the behavioral and social skills for students to use tech safely, responsibly, and effectively
2. Implement meaningful digital experiences for students to enrich their learning
3. Support parents and engage kids in the use of technology for digital learning
4. Understand Student Data Privacy and how to better evaluate Ed tech apps

Expected Outcomes

Content Development:

1. Common Sense Education will work with Facebook to customize the Teacher Institutes to digital citizenship and learning topics that are both critical for our educators and aligned with Facebook and Common Sense areas of focus. Examples include Teacher Institutes that focus on Fake News, Safe and Responsible Media Usage, and Online Privacy.
2. Common Sense will develop new training materials for the Teacher Institutes, including the agenda, presentation materials, videos, activities, and takeaways, working with Facebook to customize accordingly.

Teacher Institutes:

1. Common Sense and Facebook will offer four Teacher Institutes in 2017 taking place at Facebook locations in Menlo Park, CA, Austin, TX, New York, NY and Seattle Washington. We hope to conduct 1 in the late Spring and 3 in the Fall pending Facebook location availability.
2. Facebook will generously provide:
 - a. Space for the event (Approximately 100 educator attendees)
 - b. Food (Continental Breakfast, Lunch, afternoon snack, drinks, coffee)
 - c. Event day registration process (name tags, check-in area, etc.)
 - d. Facebook branded materials for attending guests, educators love swag!

Reach:

1. We recommend a maximum approximately 100 educators for each Teacher Institute, totaling 400 educators.

Educator Impact:

1. Improvement in Knowledge and Confidence: Using post-training surveys, more than 90% of teachers who attend the event report that they have both increased confidence and increased knowledge on the topic areas presented.
2. High Net Promoter Scores: Our Teacher Institutes have very high satisfaction rates with a Net Promoter Score of 67.

3. Common Sense Educator Recognition: All attending educators will complete part of the requirements to become a recognized Common Sense Educator. Being a Common Sense Educator is an official stamp of recognition from Common Sense. Once awarded, educators receive a digital badge that they can put in their email signature (among other places) so others know about their efforts. It also allows educators to expand their résumé, expand their leadership, attend conferences, and be part of a network of fantastic educators on our Facebook Group, while also spreading the word about the great work they're doing with digital citizenship and learning.

Brand Awareness and Perception:

1. Facebook branding will be included in all promotional and invitation materials including:
 - a. Social media
 - b. Digital promotion
 - c. Direct marketing invitations
 - d. Event signage
 - e. Event follow-up materials
2. Facebook will benefit from positive brand perception as it is tackling critical issues to ensure young people thrive in today's digital world.
3. Our core educator community is the Common Sense Educators group on Facebook, and the Institutes will encourage participation in this group.

Timeline and Cost

The cost for each Teacher Institute is \$50,000 for a total of \$200,000. Thank you to Facebook for generously underwriting the cost for educator attendance. We also recommend charging teachers \$50 / teacher to ensure they have some "skin in the game" and hope to reimburse this fee through a Donors Choose credit.

The recommended timeline is as follows:

March 2017 - Finalize contract and determine event locations

April 2017 - Design Teacher Institutes and topic areas

May 2017 - First Teacher Institute, location TBD

September, 2017 - Second Teacher Institute, location TBD

October, 2017 - Third Teacher Institute, location TBD

November, 2017 - Fourth Teacher Institute, location TBD