

AMENDED Exhibit 95

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=A0817E6723444C3E98A458419C07BA3F]
Sent: 2/27/2021 2:45:28 AM
To: [REDACTED]
Subject: Message summary [{"otherUserFbld":100041723408674,"threadFbld":null}]

[REDACTED] (2/26/2021 07:52:20 PST):
>Hiii -- I mean I would love to do more here -- and it's something we should absolutely think about -- what could we do differently here to be more convincing ...

[REDACTED] (2/26/2021 07:52:40 PST):
>cause we should totally integrate it into your research plans even if we don't have the data right now

[REDACTED] (2/26/2021 08:50:18 PST):
>I also think we need to work with Responsible Innovation more ... I think they actually were ENCOURAGING of measuring emotions...like seeing it as a good thing!

[REDACTED] (2/26/2021 08:50:53 PST):
>we've had several meetings with them -- but they are probably a way for us to scale ourselves if we can integrate with them because more and more people will go to them

[REDACTED] (2/26/2021 08:52:21 PST):
>yeah, I met with someone from their team last half as well. i'll reach out and try to understand the rationale behind their perspective here, and begin to share ours. also just build those relationships

[REDACTED] (2/26/2021 08:53:54 PST):
>Maybe they can also partake in the white paper process about our role

[REDACTED] (2/26/2021 08:54:46 PST):
>would for you to spend some time though thinking how we could be more convincing to these stakeholders, because as [REDACTED] said -- this will keep coming up.

[REDACTED] (2/26/2021 08:59:02 PST):
>at some point want to debrief [REDACTED] feedback? want to keep moving that fwd in anticipation of needing to send this for leadership steer end of next week.

[REDACTED] (2/26/2021 08:59:17 PST):
>yes -- to be honest, I did not fully understand her feedback.

[REDACTED] (2/26/2021 08:59:38 PST):
>but yes -- maybe between the two of us we can figure it out :)

[REDACTED] (2/26/2021 09:01:20 PST):
>I'm around now if you want to chat for a few

[REDACTED] (2/26/2021 09:58:01 PST):
>hey there -- for the exercise for WB, should I take a stab at filling out the table assuming we're going with our option a) Feelings over time?

[REDACTED] (2/26/2021 10:01:07 PST):
>yes -- I'm actually netting that we just define this

[REDACTED] (2/26/2021 10:01:20 PST):
>and that's our definition

[REDACTED] (2/26/2021 10:04:57 PST):
>yeah -- in my original thinking and the way we've framed it as "over time", it was selected specifically because it hits all the bases of - addressing some of the important narratives, 2) consistent with external research (on emotions and affect), and 3) ladders up to Mark's original ask - about energy and about making sure we're assessing both positive and negative impacts

[REDACTED] (2/26/2021 12:17:29 PST):
>did you hear the two use cases, I missed them

[REDACTED] (2/26/2021 12:18:58 PST):
>metric for ENG to measure prevalence (how many people feel angry? how many posts make people feel angry?)

[REDACTED] (2/26/2021 12:19:11 PST):
>and identifying content that makes people feel angry

[REDACTED] (2/26/2021 12:20:55 PST):

>does feeling irritated make people think FB is bad? make them want to use it less? make them actually use it less?

[REDACTED] (2/26/2021 12:23:10 PST):

>Pratiti is not on our side here

[REDACTED] (2/26/2021 12:23:18 PST):

>nope

[REDACTED] (2/26/2021 12:23:23 PST):

>this is a surprise

[REDACTED] (2/26/2021 12:24:17 PST):

>it sounds like there's a lot more discussion that's happened with mark about this

[REDACTED] (2/26/2021 12:24:21 PST):

>and he's pushing hard

[REDACTED] (2/26/2021 12:28:47 PST):

>maybe we can help here

[REDACTED] (2/26/2021 12:29:13 PST):

>yup - suggest to [REDACTED] we workshop that table together?

[REDACTED] (2/26/2021 12:36:51 PST):

>that was kind of a weird content about policy cause I didn't get that vibe from policy

[REDACTED] (2/26/2021 12:37:04 PST):

>1 person was into it; the other had highlighted a bunch of risks

[REDACTED] (2/26/2021 12:37:19 PST):

>yeah I felt policy risks were understated

[REDACTED] (2/26/2021 12:37:28 PST):

>also clearly more due diligence needed there

[REDACTED] (2/26/2021 12:38:04 PST):

>that policy guy hadn't even looked at this content before that 30 minute meeting the other day! his responses were totally off the cuff

[REDACTED] (2/26/2021 12:38:21 PST):

>also, so much for being a fly on the wall in that mtg 😊

[REDACTED] (2/26/2021 12:38:31 PST):

>like, can you just make up a question for us on the spot?

[REDACTED] (2/26/2021 12:38:37 PST):

>OMG

[REDACTED] (2/26/2021 12:38:41 PST):

>I could not stay silent

[REDACTED] (2/26/2021 12:39:03 PST):

>like I was the only one in the room fighting for our stance

[REDACTED] (2/26/2021 12:41:15 PST):

>I really wanted to say something about the "5% of people feel irritated when they end a session". do we know that's bad?

[REDACTED] (2/26/2021 12:41:32 PST):

>like, my kid leaves basketball practice feeling irritated or even fully angry about 30 % of the time

[REDACTED] (2/26/2021 12:41:44 PST):

>but mine LOVES basketball and can't wait for the next practice

[REDACTED] (2/26/2021 12:56:52 PST):

>I know dude -- even just listening to them speak, makes me sick to my stomach

[REDACTED] (2/26/2021 12:59:13 PST):

>do people really think that a meaningful product that plays an important role in people's lives should only make people feel good/delighted/inspired, all the time??

[REDACTED] (2/26/2021 12:59:19 PST):

>are we ice cream??

[REDACTED] (2/26/2021 13:29:55 PST):

>Trying to merge several discussions happening at once -- I put together this document -- would love your eyes on it: <https://docs.google.com/document/d/1s90NZjFQ-ZbEiOxHugrszIeJmPTzWVF6v-ONP1AaJbk/edit>

[REDACTED] (2/26/2021 13:30:32 PST):

>This would go to Pratiti where she would use it to facilitate/escalate a convo with leadership about IG alignment

[REDACTED] (2/26/2021 16:04:25 PST):

>do you think life satisfaction we should fold into Feelings Over Time?

[REDACTED] (2/26/2021 16:04:56 PST):

>I would say no

[REDACTED] (2/26/2021 16:05:08 PST):

>that's more of a self-attitude/beliefs category

[REDACTED] (2/26/2021 16:05:09 PST):

>and loneliness is not considered, correct?

[REDACTED] (2/26/2021 16:05:19 PST):

>loneliness we're doing through connection workstream

[REDACTED] (2/26/2021 16:05:23 PST):

>agreed - just want to make sure we're aligned

[REDACTED] (2/26/2021 16:05:34 PST):

>great - just confirming!

[REDACTED] (2/26/2021 16:05:42 PST):

>it actually probably would be great to have an excludes somewhere

[REDACTED] (2/26/2021 16:05:49 PST):

>like a footnote

[REDACTED] (2/26/2021 16:12:38 PST):

>I added in alignment doc (feel free to move). i will also put the causal study citations in the appendix

[REDACTED] (2/26/2021 16:13:56 PST):

>the nielsen study does show causal impact on social comparison 😊

[REDACTED] (2/26/2021 16:14:37 PST):

>I know - I remember that. specifically remembering [REDACTED] saying that's the outcome he stands behind

[REDACTED] (2/26/2021 16:14:46 PST):

>During the last 7 days, how often did you compare your own accomplishments to those of other people?

[REDACTED] (2/26/2021 16:14:53 PST):

>During the last 7 days, how often did you feel worse about yourself after comparing yourself to someone else?

[REDACTED] (2/26/2021 16:15:10 PST):

>and I think both held

[REDACTED] (2/26/2021 16:25:07 PST):

>I count 8 causal studies

[REDACTED] (2/26/2021 16:28:54 PST):

>for "emotions"?

[REDACTED] (2/26/2021 16:29:07 PST):

>for emotions and affect

[REDACTED] (2/26/2021 16:29:07 PST):

>do you want just run the DVs by me to make sure we're aligned?

[REDACTED] (2/26/2021 16:30:29 PST):

><https://docs.google.com/spreadsheets/d/1ufsZWYwEDVjsiKdsIJgWOKR-7GQqsLQsV9vbcivveA/edit#gid=257067240>

[REDACTED] (2/26/2021 16:30:32 PST):

>in Causal Impact tab

[REDACTED] (2/26/2021 16:30:41 PST):

>first 3 columns

[REDACTED] (2/26/2021 16:31:41 PST):

>gah sorry I'm confused

[REDACTED] (2/26/2021 16:31:53 PST):

>also I just realized there are two versions of this floating around

[REDACTED] (2/26/2021 16:31:57 PST):

>since there's one in my tab too

[REDACTED] (2/26/2021 16:32:05 PST):

>not sure which is the most up-to-date?

[REDACTED] (2/26/2021 16:32:33 PST):

>but either way -- how do I see the DVs you're currently counting as "emotions"?

[REDACTED] (2/26/2021 16:34:49 PST):

>so column 1 is tx effect

[REDACTED] (2/26/2021 16:35:01 PST):

>column 2 is whether or not DV aligns with our definition

[REDACTED] (2/26/2021 16:35:12 PST):

>3rd column is how DV was operationalized in the study

[REDACTED] (2/26/2021 16:36:27 PST):

>so is column V wildly off from the instruments?

[REDACTED] (2/26/2021 16:36:41 PST):

>for example row 3 says "quality of day"

[REDACTED] (2/26/2021 16:37:04 PST):

>I don't know what that column is, but i'm using the operationalization of the DV

[REDACTED] (2/26/2021 16:37:22 PST):

>I also think there's 1 causal study for social comparison

[REDACTED] (2/26/2021 16:37:26 PST):

>the yuen study

[REDACTED] (2/26/2021 16:38:16 PST):

>is Row 24 correctly labeled as Y?

[REDACTED] (2/26/2021 16:38:34 PST):

>I hadn't counted "affective well-being" as emotions, but could be convinced

[REDACTED] (2/26/2021 16:39:12 PST):

>I want to include positive and negative affect in our definition. these are measures of emotional response over time

[REDACTED] (2/26/2021 16:39:21 PST):

>they include emotions and mood

[REDACTED] (2/26/2021 16:39:23 PST):

>I also had not included "absorbed" as an emotion

[REDACTED] (2/26/2021 16:39:40 PST):

>switch row?

[REDACTED] (2/26/2021 16:39:41 PST):

>or "Aggregation of Well-being index"

[REDACTED] (2/26/2021 16:39:52 PST):

>Row 26

[REDACTED] (2/26/2021 16:39:57 PST):

>Row 31

[REDACTED] (2/26/2021 16:40:39 PST):

>those are the only 3 where I think I had difference

[REDACTED] (2/26/2021 16:40:53 PST):

>I'd count both of those, but absorbed could go either way

[REDACTED] (2/26/2021 16:41:01 PST):

>but doesn't change the overall # of studies

[REDACTED] (2/26/2021 16:41:05 PST):

>but 24 is incorrect right?

[REDACTED] (2/26/2021 16:41:54 PST):

>well, it's asking people about anger

[REDACTED] (2/26/2021 16:42:41 PST):
>interesting -- I was definitely going by the DV label rather than the instrument

[REDACTED] (2/26/2021 16:42:51 PST):
>So that's probably why we're off

[REDACTED] (2/26/2021 16:43:01 PST):
>yup

[REDACTED] (2/26/2021 16:43:16 PST):
>but we should go with the instrument

[REDACTED] (2/26/2021 16:44:06 PST):
>hard to say -- I think it's a lot less feasible to have us evaluate the instruments to determine what the study was about

[REDACTED] (2/26/2021 16:44:27 PST):
>for the causal studies?

[REDACTED] (2/26/2021 16:44:50 PST):
>there aren't that many...

[REDACTED] (2/26/2021 16:45:08 PST):
>it's probably more manageable through that lens, but I worry about using different processes for the different methods

[REDACTED] (2/26/2021 16:45:28 PST):
>where in 1 we determine what the study was about based on the instrument, and the others we determine what the study is about based on how the academic labeled it

[REDACTED] (2/26/2021 16:45:46 PST):
>I'm fine with either, just recommending we should be consistent

[REDACTED] (2/26/2021 16:48:13 PST):
>when have we used the shorthand for what the author called the DV as opposed to the instrument/what they actually measured?

[REDACTED] (2/26/2021 16:49:29 PST):
>we only used the DV label from the study for generating well-being topics

[REDACTED] (2/26/2021 16:49:53 PST):
>mmmmmm

[REDACTED] (2/26/2021 16:49:55 PST):
>we stuck to the author's interpretations and labels to avoid getting into an interpretation battle

[REDACTED] (2/26/2021 16:50:58 PST):
>for this part of the process, where we're really digging in to what the topic is, i think we should go with the operationalization

[REDACTED] (2/26/2021 16:52:14 PST):
>so what's your assessment now to determine whether something is an emotion in the instrument?

[REDACTED] (2/26/2021 16:53:06 PST):
>Like, what is this one: "Aggregation of Well-being index"

[REDACTED] (2/26/2021 16:53:55 PST):
>if they use an emotion word in the instrument that qualifies? Is that the rule?

[REDACTED] (2/26/2021 16:56:34 PST):
>no -- it's if an instrument asks about a person's emotional response, or positive/negative affect. NOT if it's a scale used to assess symptoms of a diagnosable mental health disorder (e.g., CESD depression scale)

[REDACTED] (2/26/2021 16:59:03 PST):
>i think row 24 is prob incorrectly labelled

[REDACTED] (2/26/2021 16:59:25 PST):
>got it -- happy to have you do whatever you prefer, let's just make sure the decision is documented somewhere and try to be consistent in how we do this across different exercises

[REDACTED] (2/26/2021 16:59:39 PST):
>like if we're going to do anything about any of the metaanalyses or cross-sectional work

[REDACTED] (2/26/2021 16:59:56 PST):
>sounds good.

[REDACTED] (2/26/2021 17:11:48 PST):
>On Monday, can you just update the table in the IG doc with where you land on the numbers and studies?

[REDACTED] (2/26/2021 17:12:08 PST):
>(for both social comparison and emotions)

[REDACTED] (2/26/2021 17:12:36 PST):
>will do first thing

[REDACTED] (2/26/2021 18:41:30 PST):
>@silent thanks so much for great collaboration and communication this week. So glad to be working together. Have a great weekend! ♥

[REDACTED] (2/26/2021 18:45:28 PST):
>@silent same!!! Can't wait for more! We are going to do some incredible things together -- and excited to trailblaze with you through this!