

AMENDED Exhibit 980

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

From: Deborah Oshuntola [REDACTED]
 Sent: 10/11/2017 10:54:31 AM
 To: Nona Farahnik Yadegar [REDACTED]
 CC: [REDACTED] T&S Team Leads [REDACTED]
 Subject: Re: School requesting



Update for future reference:

[REDACTED] approved the below language; I added the "Terms of Service" hyperlink and have sent to the user.
 Thanks!

Dear Sara,

Thank you for following up.

Custom Stories is available to all Snapchatters and cannot be disabled.

However, if you notify us of specific content that violates our [Terms of Service](#) we will take appropriate action. Could you please provide us with the usernames of the accounts posting the material you describe? To find a username in a Custom Story please press and hold on the Snap and tap the Custom Story name in the upper-left hand corner of the screen.

In addition to specific usernames, you and your students can also report a Snap in a Custom Story by following the below steps:

1. Go to the Snap you want to report
2. Press and hold on the Snap
3. Tap the  button that appears in the bottom-left corner
4. Let us know why you want to report this Snap

If you feel that a crime has been committed, we encourage you to contact your local law enforcement. In appropriate circumstances, Snapchat is able to provide information to law enforcement that can assist in identifying persons suspected of using Snapchat unlawfully.

Please don't hesitate to reach out if you have any other questions or concerns.

Sincerely

On Fri, Oct 6, 2017 at 4:24 PM, Deborah Oshuntola <[REDACTED]> wrote:
 Hey Nona,

Thanks for those suggestions! I believe the educator is referring to the Custom Stories as geofenced stories because I initially provided her with info from the support site that called them geofenced stories:

To help clarify, I wanted to provide you with more information about Snapchat features. Custom Stories let Snapchatters and their friends tell all kinds of Stories together and last for 24 hours. There are two types of Custom Stories:

- Group Stories, where Snapchatters and the friends they choose can create new Stories together around a night out or a new adventure
- Geofenced Stories, in which Snapchatters can create Stories that they and all their friends, and even their friends, can add to when they're at a specific place.

Apologies if I didn't make this clearer earlier, I think the educator now understands the features and wants to specifically report the geofence element of the Custom Stories posted by students.

On Fri, Oct 6, 2017 at 3:53 PM, Nona Farahnik Yadegar [REDACTED] wrote:

Deborah, see below for my changes. I think we need to work harder in making sure the educator understands the different features. she clearly doesn't know what they are in the first place. Please take a close look and [REDACTED] please add this to the agenda for the next team meeting as an issue spotter. @ [REDACTED] let us know what u think.

Redacted--AC

On Fri, Oct 6, 2017 at 1:46 PM, Nona Farahnik Yadegar [REDACTED] > wrote:

I want them to be reformed about how the features work. Can u add to the draft and I'll have some tweaks for [REDACTED]'s review?

On Fri, Oct 6, 2017 at 1:27 PM Deborah Oshuntola [REDACTED] wrote:
Thanks Nona - user has previously been informed about features but I'll include how to report info.

Hi [REDACTED]

Could you please advise

Redacted--AC

Redacted--AC

On Fri, Oct 6, 2017 at 11:53 AM, Nona Farahnik Yadegar [REDACTED] wrote:

Deborah,

It sounds like this teacher might also be referencing Custom Stories. I think we need to loop [REDACTED] in on a draft that

- 1) reiterates how to report users for investigation and how to flag content
- 2) re-explains our stories and explains custom stories, and that these are global features of the app
- 3) refer her to law enforcement

and let's see if [REDACTED]

Redacted--AC

On Fri, Oct 6, 2017 at 8:22 AM, 'Deborah Oshuntola' via T&S Team Leads [REDACTED]

wrote:

Hi all,

An educator followed up to ask if we can gate the area around their school because child porn is being shared by students in Geofenced stories.

I previously asked her to provide usernames of the accounts in question and provided her with information on Custom Stories. Unfortunately, she did not provide any usernames so we can't confirm that the content being sent violates our terms and needs to be sent to NCMEC.

ZD Link: 13802510

Message: The reoccurring issue is with Geofenced stories that are linked to our zip code, 68504, around our building. We have 2200 students in our building, which makes it next to impossible to have all students 'block' or not participate in these inappropriate Snaps. Our administrative team has been working to shut down these Geofenced stories when we are aware that they exist by contacting students to have them eliminate the posted Snaps. However, this is interfering significantly with the daily operations of our building as this take continual monitoring to 'safeguard the children within our care.'

Our biggest concern is the child pornography that being posted, screenshot, and then distributed via snapchat.

What can we do to have the Geofenced accounts eliminated from our area?

Should I follow up asking for usernames and send the crime snippet? We don't have language at the moment on whether or not we can gate areas.

Thanks,
Deborah

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You received this message because you are subscribed to the Google Groups "T&S Team Leads" group. To unsubscribe from this group and stop receiving emails from it, send an email to [t\[REDACTED\]@groups.google.com](mailto:t[REDACTED]@groups.google.com).

To post to this group, send email to [\[REDACTED\]@groups.google.com](mailto:[REDACTED]@groups.google.com).

To view this discussion on the web visit <https://groups.google.com/a/snapchat.com/d/msgid/ts-team-leads/CAJKuSZZQXHxV4A7uzxXE0HZ1FnXDJm1rUC3wcvSbbozgyegmHA%40mail.gmail.com>.

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Nona Farahnik Yadegar
Trust & Safety Manager | Snapchat

Snap Inc.
[REDACTED]

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