

AMENDED Exhibit 343

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: Darius Kilstein [/O=THEFACEBOOK/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=██████████]
Sent: 8/20/2020 1:34:08 AM
To: Darius Kilstein ██████████; ██████████
Subject: Message summary [{"otherUserFbId":100040853675423,"threadFbId":null}]

Meta-Kilstein-30

12/17/2024

Jenny L. Griffin, CSR

Darius Kilstein (8/19/2020 12:31:13 PDT):
 >omg check this out

Darius Kilstein (8/19/2020 12:31:14 PDT):
 >https://fb.workplace.com/groups/fyi/permalink/3382011645189305/?comment_id=3383908324999637

Darius Kilstein (8/19/2020 12:31:22 PDT):
 ██████████ is a designer on Growth

Darius Kilstein (8/19/2020 12:31:45 PDT):
 >Never mix politics with work kids

██████████ (8/19/2020 12:32:27 PDT):
 >WOAH

██████████ (8/19/2020 12:32:31 PDT):
 >what the fuck

Darius Kilstein (8/19/2020 12:33:25 PDT):
 shared: 50188152_2301769603438837_1923266297651527680_n.gif

██████████ (8/19/2020 12:33:35 PDT):
 >i mean

██████████ (8/19/2020 12:33:47 PDT):
 >he could have made his point without writing it the way he did

██████████ (8/19/2020 12:33:58 PDT):
 >he wrote it in as incendiary way as possible

██████████ (8/19/2020 12:34:02 PDT):
 >jesus

Darius Kilstein (8/19/2020 12:34:14 PDT):
 >Yeh he had major issues with Lina a while back

Darius Kilstein (8/19/2020 12:34:25 PDT):
 >Had to step in to help calm the situation

Darius Kilstein (8/19/2020 12:34:30 PDT):
 >so he's known to be incendiary

██████████ (8/19/2020 12:34:33 PDT):
 >missing some basic EQ

Darius Kilstein (8/19/2020 12:35:16 PDT):
 >You cant fight the pack these days, and to try and do it in a work setting and all heeated up is just plain stupid

Darius Kilstein (8/19/2020 12:35:24 PDT):
 >I guess you could consider him brave though?

██████████ (8/19/2020 12:35:31 PDT):
 >i think you

██████████ (8/19/2020 12:35:32 PDT):
 >can

Darius Kilstein (8/19/2020 12:35:34 PDT):
 shared: 117715520_1430726417120110_9193917250683288370_n.png

██████████ (8/19/2020 12:35:36 PDT):
 >and ppl should

██████████ (8/19/2020 12:36:04 PDT):
>but telling a black woman her post is like back of the bus racism

██████████ (8/19/2020 12:36:09 PDT):
>seriously?

Darius Kilstein (8/19/2020 12:36:50 PDT):
>Yeh, not great

Darius Kilstein (8/19/2020 12:36:59 PDT):
>Someone tagged his manager, his managers manager, and his managers managers manager

Darius Kilstein (8/19/2020 12:37:03 PDT):
>ruthless

██████████ (8/19/2020 12:37:03 PDT):
>i saw

██████████ (8/19/2020 12:37:07 PDT):
>ya

Darius Kilstein (8/19/2020 12:37:20 PDT):
>I do agreee with the left leaning company though

██████████ (8/19/2020 12:37:27 PDT):
>i mean we are too sjw

Darius Kilstein (8/19/2020 12:37:28 PDT):
>it definitely is, there's no way around that

██████████ (8/19/2020 12:37:32 PDT):
>thats like all of tech

Darius Kilstein (8/19/2020 12:37:37 PDT):
>I gave ██████████ that feedback for US 2020 lol

██████████ (8/19/2020 12:37:40 PDT):
>even though deep in side we're not

Darius Kilstein (8/19/2020 12:37:45 PDT):
>"Try and be balanced"

██████████ (8/19/2020 12:37:47 PDT):
>deep inside we are all about \$\$\$

██████████ (8/19/2020 12:38:01 PDT):
>but there is a way to get your point across

██████████ (8/19/2020 12:38:11 PDT):
>and there is a way to just be a dick about things

Darius Kilstein (8/19/2020 12:38:33 PDT):
>totally

Darius Kilstein (8/19/2020 12:38:48 PDT):
>Hey i'm less versed in the art of left vs right misinfo

Darius Kilstein (8/19/2020 12:38:53 PDT):
><https://fb.workplace.com/photo.php?fbid=774661876621959&set=pcb.299373467984412&type=3&theater>

Darius Kilstein (8/19/2020 12:39:07 PDT):
>Are all of these terms anti-right?

Darius Kilstein (8/19/2020 12:39:12 PDT):
>or is it balanced?

██████████ (8/19/2020 12:42:11 PDT):
>i think the problem is

██████████ (8/19/2020 12:42:18 PDT):
>with these things, its highly contextual

██████████ (8/19/2020 12:42:37 PDT):
>so like for a certain group of ppl, yes

██████████ (8/19/2020 12:42:53 PDT):
>but not everyone

██████ (8/19/2020 12:42:58 PDT):
>its like

██████ (8/19/2020 12:43:43 PDT):
>here in the US, when you talk about eating chicken and watermelon, esp in the south, it has a long history of association of discrimination against black ppl,

██████ (8/19/2020 12:44:13 PDT):
>and most african americans who grew up here, would be really offended by that

██████ (8/19/2020 12:44:30 PDT):
>but in asia, this is a very common and very popular offering

██████ (8/19/2020 12:44:44 PDT):
>and no one would consider it racist, even visitors

██████ (8/19/2020 12:44:53 PDT):
>b/c it does not have the same associations

██████ (8/19/2020 12:45:06 PDT):
>btw this was a good segment on ugly delicious

██████ (8/19/2020 12:45:11 PDT):
>that i saw recently

██████ (8/19/2020 12:45:27 PDT):
>but pretty interesting and relevant

Darius Kilstein (8/19/2020 12:46:49 PDT):
>Makes sense

Darius Kilstein (8/19/2020 12:47:56 PDT):
>I for one, love fried chicken

██████ (8/19/2020 12:47:58 PDT):
>i mean thats why mark wants us to be a platform

██████ (8/19/2020 12:48:03 PDT):
> cuz this is hard

██████ (8/19/2020 12:48:05 PDT):
>me too

██████ (8/19/2020 12:48:08 PDT):
>and watermelon

Darius Kilstein (8/19/2020 12:49:06 PDT):
>I was just a little concerned because Gregoire shared this chart (and I only recognise anti-trump hashtags) - and then he told me he was asked to analyze QAnon next, and i'm wondering if there is someone pulling the strings asking us to look at misinfo only which galvanizes the right and not the left. I want to ensure he is balanced

Darius Kilstein (8/19/2020 12:49:21 PDT):
>ideally we are looking at both :)

██████ (8/19/2020 12:49:22 PDT):
>that makes sense

Darius Kilstein (8/19/2020 12:50:02 PDT):
>Anyways i told him to remain as balanced as possible

██████ (8/19/2020 12:50:09 PDT):
>just so you know

██████ (8/19/2020 12:50:22 PDT):
>we have seen repeatedly that more misinfo come from the right

██████ (8/19/2020 12:50:33 PDT):
>(based on 3rd party fact checkers)

Darius Kilstein (8/19/2020 12:50:47 PDT):
>Yeh thats what I was thinking too

██████ (8/19/2020 12:50:55 PDT):
>but def agree he should be careful always in his work, period

██████ (8/19/2020 12:50:57 PDT):

>also in the framing

██████ (8/19/2020 12:51:19 PDT):
>like i was more worried he called it "bad hashtags" :)

██████ (8/19/2020 12:51:35 PDT):
>does not pass the nytimes test!

Darius Kilstein (8/19/2020 12:52:13 PDT):
>totally, is there a crash course in the do's/dont's for political work @ FB

Darius Kilstein (8/19/2020 12:52:24 PDT):
>Political Bootcamp

██████ (8/19/2020 12:52:24 PDT):
>i mean the simple shit is

Darius Kilstein (8/19/2020 12:52:28 PDT):
>there totally should be one

██████ (8/19/2020 12:52:54 PDT):
>if your analysis gets published in nytimes tomorrow, does this make us look bad and nefarious and biased

██████ (8/19/2020 12:53:11 PDT):
>which as we know now, leaks happen all the time

Darius Kilstein (8/19/2020 12:53:15 PDT):
>Ya this is a classic

██████ (8/19/2020 12:53:44 PDT):
>but you know what this is a good call

██████ (8/19/2020 12:54:07 PDT):
>we should think of a way to do a crash course

██████ (8/19/2020 12:54:23 PDT):
>esp for more jr ppl who may have not yet built up their judgement muscle

Darius Kilstein (8/19/2020 12:54:49 PDT):
>I'm sure someone on policy/legal could run a class with minimal prep

Darius Kilstein (8/19/2020 12:54:57 PDT):
>actually they probably need a lot of prep

Darius Kilstein (8/19/2020 12:55:04 PDT):
>to ensure safety of learnings lol

Darius Kilstein (8/19/2020 12:55:12 PDT):
>Feels like a great org contribution for them :P

██████ (8/19/2020 12:55:13 PDT):
>actually i wonder if PR can help

██████ (8/19/2020 12:55:16 PDT):
>haha

██████ (8/19/2020 12:55:23 PDT):
>im sure they'd be happy

██████ (8/19/2020 12:55:31 PDT):
>alex s had to testify in court

██████ (8/19/2020 12:55:40 PDT):
>b/.c of that analysis he did with tom cunningham

██████ (8/19/2020 12:55:52 PDT):
>im sure he wishes it was framed differently

██████ (8/19/2020 12:56:00 PDT):
>also that peice from 2 weeks ago in WSJ

██████ (8/19/2020 12:56:04 PDT):
>about us and racial justic

Darius Kilstein (8/19/2020 12:56:07 PDT):
>omg i missed all of this

Darius Kilstein (8/19/2020 12:56:09 PDT):

>lol

██████ (8/19/2020 12:56:12 PDT):
>using some old ass and debunked analysis

██████ (8/19/2020 12:56:35 PDT):
>haha you're missing the all action :)

██████ (8/19/2020 12:56:39 PDT):
>hey btw

██████ (8/19/2020 12:56:54 PDT):
>not sure if you saw my response back to alex

██████ (8/19/2020 12:56:56 PDT):
>i added u

██████ (8/19/2020 12:57:06 PDT):
>might be good for bockin and him to push

██████ (8/19/2020 12:58:16 PDT):
>altho not sure if you 100% agree with my thought that we can try more things...i think you guys at least formally said no to that right?

Darius Kilstein (8/19/2020 12:59:53 PDT):
>Yep Bocking is exchanging emails with ██████. I reached out to Andrew privately and told him that I disagree with this decision, and he agrees, looks like Alex does too

Darius Kilstein (8/19/2020 13:00:18 PDT):
>We can try more things, it's just not as lucrative as US DAU so we put it on hold this half

██████ (8/19/2020 13:00:27 PDT):
>i think also

██████ (8/19/2020 13:00:34 PDT):
>i like i was not close to how this came together

Darius Kilstein (8/19/2020 13:00:38 PDT):
>w/ more staffing we could, although I think we'll never really mitigate enough

██████ (8/19/2020 13:00:47 PDT):
>but ideally our need was to demonstrate committmdnt

██████ (8/19/2020 13:00:52 PDT):
>vs this exact idea

Darius Kilstein (8/19/2020 13:01:10 PDT):
>This is basically Karina/██████ pigeon holing our org into a corner

██████ (8/19/2020 13:01:11 PDT):
>i wonder if we actually worked with policy to define what that could look like

██████ (8/19/2020 13:01:26 PDT):
>vs this one thing

Darius Kilstein (8/19/2020 13:01:29 PDT):
>Their argument is that if we don't do it, regulators will force us anyway and its only a matter of time

██████ (8/19/2020 13:01:35 PDT):
>i know

██████ (8/19/2020 13:01:43 PDT):
>but there is not one way to do this

██████ (8/19/2020 13:01:45 PDT):
>for ex

██████ (8/19/2020 13:01:57 PDT):
>you can do opt in / out - which i also dont know why we didnt test

██████ (8/19/2020 13:01:59 PDT):
>or

██████ (8/19/2020 13:03:27 PDT):
>you can build something smarter, than default by private, for example not letting ppl who are 2+ degrees from you or some measure of "familiarity" get in touch with you

Darius Kilstein (8/19/2020 13:03:42 PDT):

>This was never really about increasing safety

Darius Kilstein (8/19/2020 13:03:46 PDT):

>It was all for the PR wins

██████ (8/19/2020 13:03:50 PDT):

>i know

██████ (8/19/2020 13:03:54 PDT):

>but my point is

██████ (8/19/2020 13:03:58 PDT):

>we can get a PR win

██████ (8/19/2020 13:04:04 PDT):

>if we worked with OR

Darius Kilstein (8/19/2020 13:04:05 PDT):

>If the goal was to increase safety, we'd go hard after the places where safety are a problem (e.g. Direct, Search)

██████ (8/19/2020 13:04:06 PDT):

>PR

██████ (8/19/2020 13:04:12 PDT):

>on defining some measures

██████ (8/19/2020 13:04:14 PDT):

>taht looks good

██████ (8/19/2020 13:04:23 PDT):

>that does not have such big losses

██████ (8/19/2020 13:04:30 PDT):

>we took this really literally

██████ (8/19/2020 13:04:34 PDT):

>even though we know up front

██████ (8/19/2020 13:04:47 PDT):

>that the safety problem we really care about

██████ (8/19/2020 13:05:00 PDT):

>was really high intensity spare prevalence

██████ (8/19/2020 13:05:07 PDT):

>and there are better ways to solve for that

██████ (8/19/2020 13:05:09 PDT):

>than this

██████ (8/19/2020 13:05:38 PDT):

>half the shit we did for bullying last yr was for pr

Darius Kilstein (8/19/2020 13:05:54 PDT):

>Yah totally agree. I don't know how this project came together so have less context. The original framing I heard was "Default to private and mitigate and there's no way around it". That is how the team executed

██████ (8/19/2020 13:06:01 PDT):

>ya

██████ (8/19/2020 13:06:18 PDT):

>i mean hindsight 2020 for me

██████ (8/19/2020 13:06:27 PDT):

>b/c the real problem we want to solve

██████ (8/19/2020 13:06:31 PDT):

>is demonstrate commitment

Darius Kilstein (8/19/2020 13:07:24 PDT):

>I think that's true but it'd be worth checking in with Karina or ██████ on that

██████ (8/19/2020 13:07:33 PDT):

>also PR should be working to spin up a good strong on whatever we build, not the other way around

██████ (8/19/2020 13:07:43 PDT):

>i did ping karina separately

██████ (8/19/2020 13:46:23 PDT):
>ok

██████ (8/19/2020 13:46:28 PDT):
>so we just had a call

██████ (8/19/2020 13:46:31 PDT):
>me and k

██████ (8/19/2020 13:46:34 PDT):
>sounds like a few things

██████ (8/19/2020 13:46:39 PDT):
>we could have done other things

██████ (8/19/2020 13:46:57 PDT):
>but we didnt and now its too late, we are on borrowed time with regulators

██████ (8/19/2020 13:47:13 PDT):
>adam shot down the opt in option last yr, not sure why was not in that meeting

██████ (8/19/2020 13:47:21 PDT):
>also sounds like the way we did this

██████ (8/19/2020 13:47:30 PDT):
>was kind of a cluster

██████ (8/19/2020 13:47:50 PDT):
>ideally we testing variations

██████ (8/19/2020 13:47:58 PDT):
>long term

██████ (8/19/2020 13:48:01 PDT):
>even ones adam didnt like

██████ (8/19/2020 13:48:05 PDT):
>and we didnt

██████ (8/19/2020 13:48:16 PDT):
>so then we're stuck now with one shitty option to go forward with

██████ (8/19/2020 13:48:25 PDT):
>although we can still change it

██████ (8/19/2020 13:48:34 PDT):
>the regulators are not married to this treatment

██████ (8/19/2020 13:48:52 PDT):
>they are married to us showing we have some way to protect teens when they first sign on

██████ (8/19/2020 13:49:06 PDT):
>and that protection can mean diff things

██████ (8/19/2020 13:51:29 PDT):
>but the other things she called out, which was right

██████ (8/19/2020 13:51:44 PDT):
>is that we are getting cruficified by regulators on this

██████ (8/19/2020 13:52:30 PDT):
>and that FB and whatsapp do not have this problem b/c they already are private by default

██████ (8/19/2020 13:58:48 PDT):
>this also tells me we need to figure out a better working model btw growth and WB

██████ (8/19/2020 13:59:27 PDT):
>ideally this was not handoff but a solution built w/ privacy and growth in mind from the getgo

██████ (8/19/2020 13:59:36 PDT):
>and seems like that didnt happen

Darius Kilstein (8/19/2020 14:22:06 PDT):
>Yes AFAIK this was a handoff from WB. ██████ will have way more context on inception so I can check in with him when he's back next week.





















