

AMENDED Exhibit 319

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

Inappropriate Interactions with Children on Instagram

Proactive Risk Investigation

██████, ██████, ██████, and ██████

June 20, 2019

Thank you

Instagram

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Karina Newton

[REDACTED]

[REDACTED]

(Messenger)

[REDACTED] (Search)
IG well-being

[REDACTED]

[REDACTED]

Problem Process

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (Graph Integrity)

Content Policy

[REDACTED]

[REDACTED]

[REDACTED]

Safety Policy

Antigone Davis

[REDACTED]

External Metrics CP Platforms

[REDACTED]

[REDACTED]

Core Data Science

[REDACTED]

CI

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

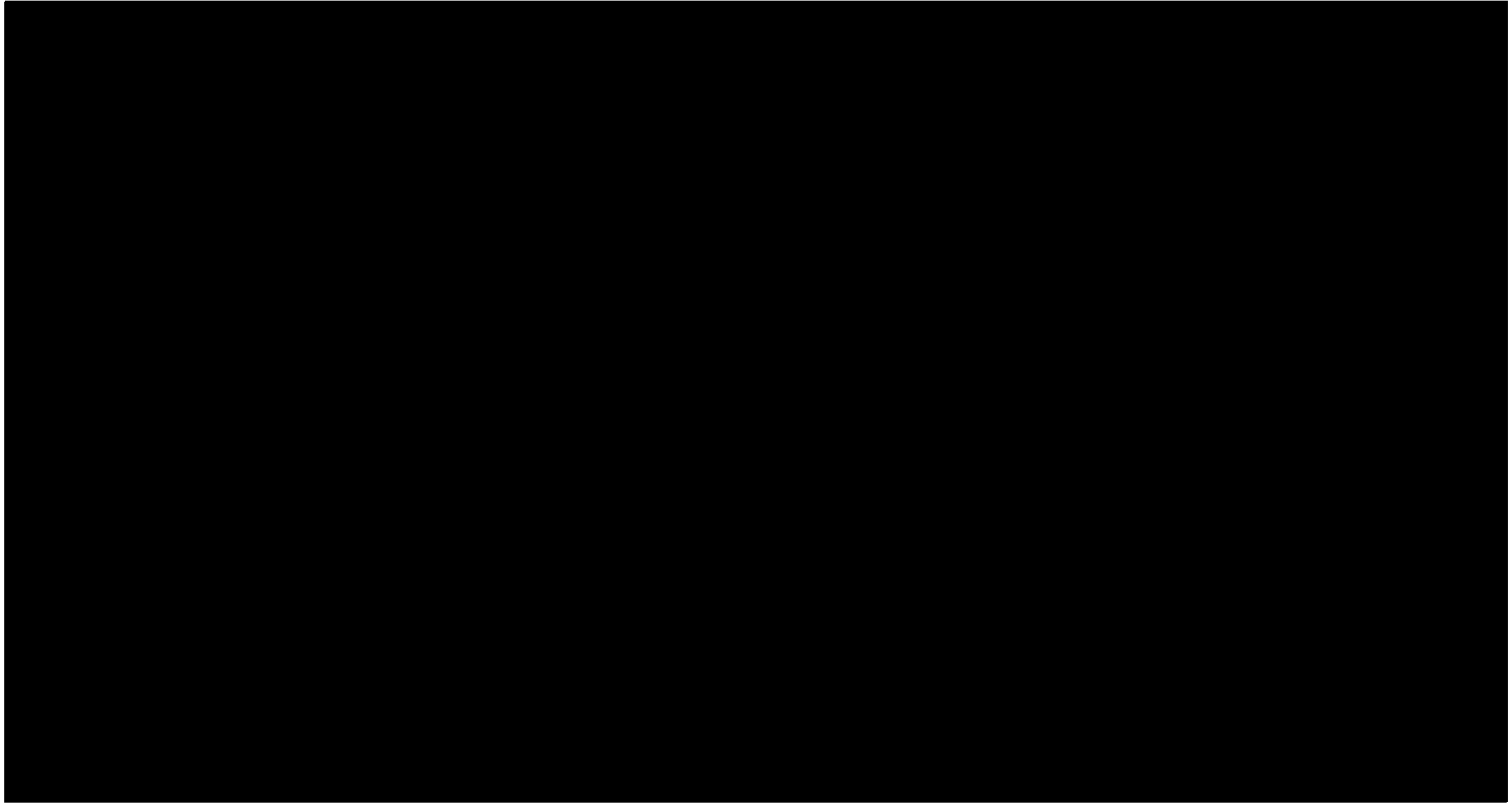
CI RES

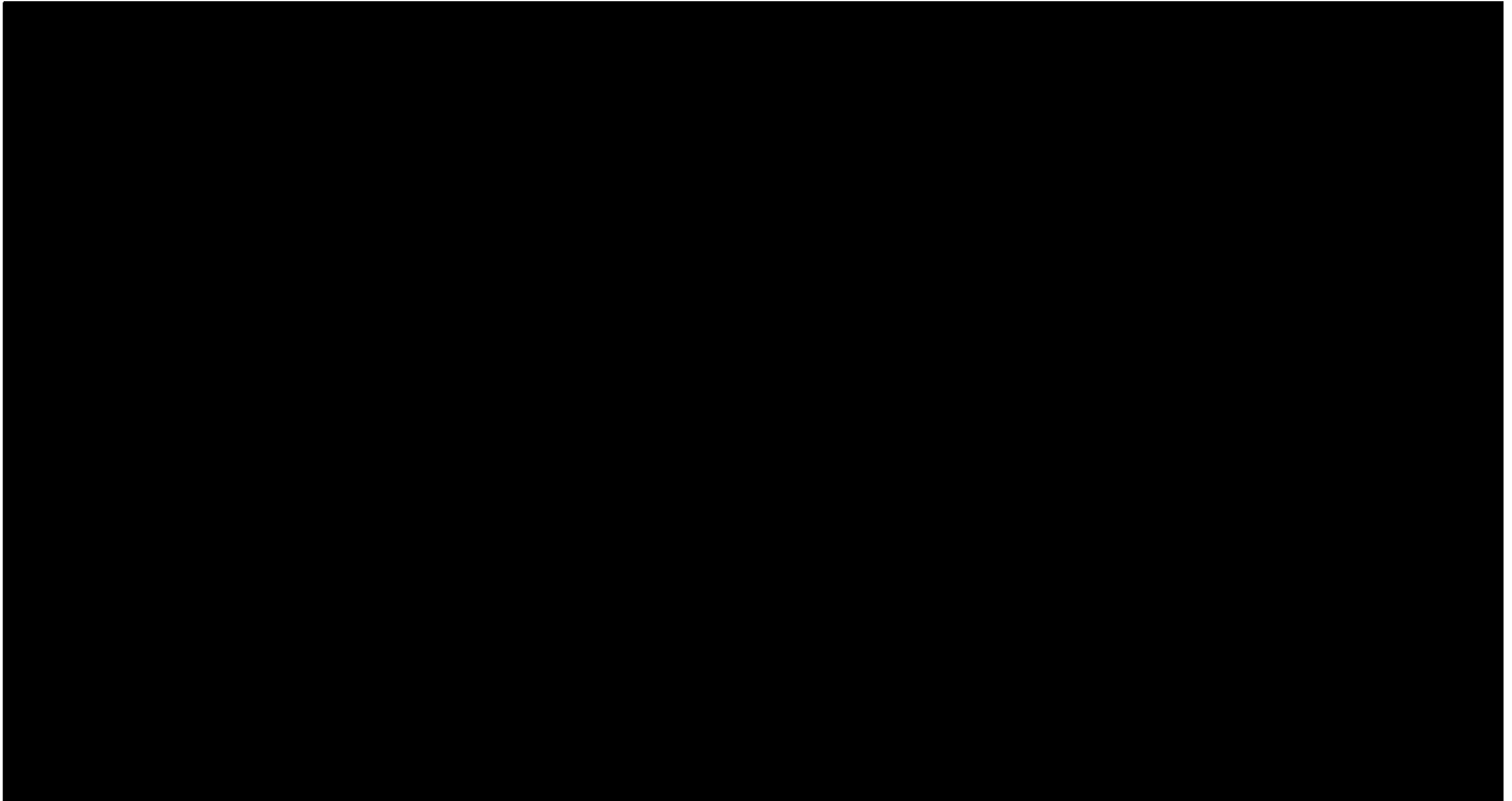
[REDACTED]

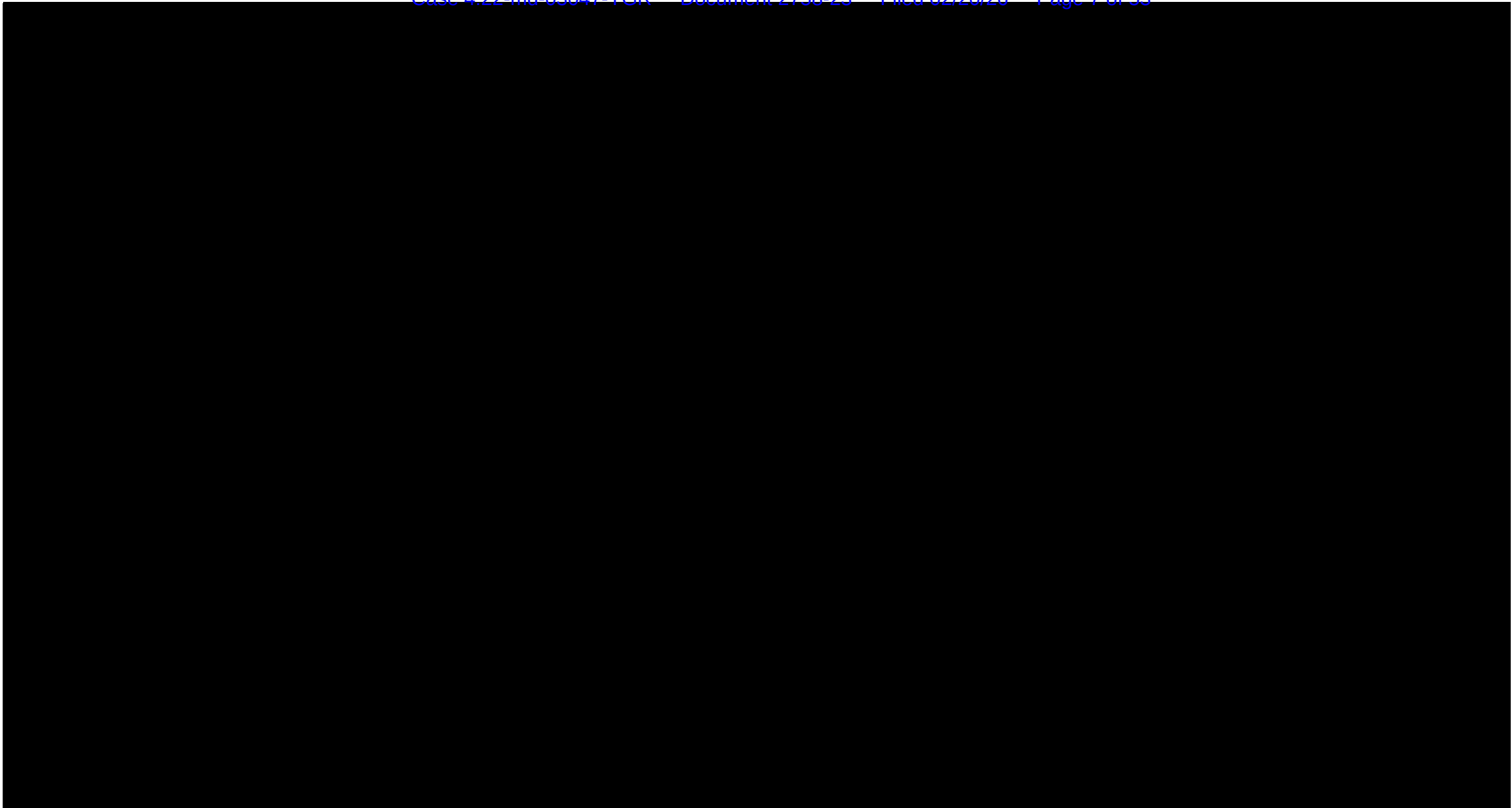
Imminent Risk

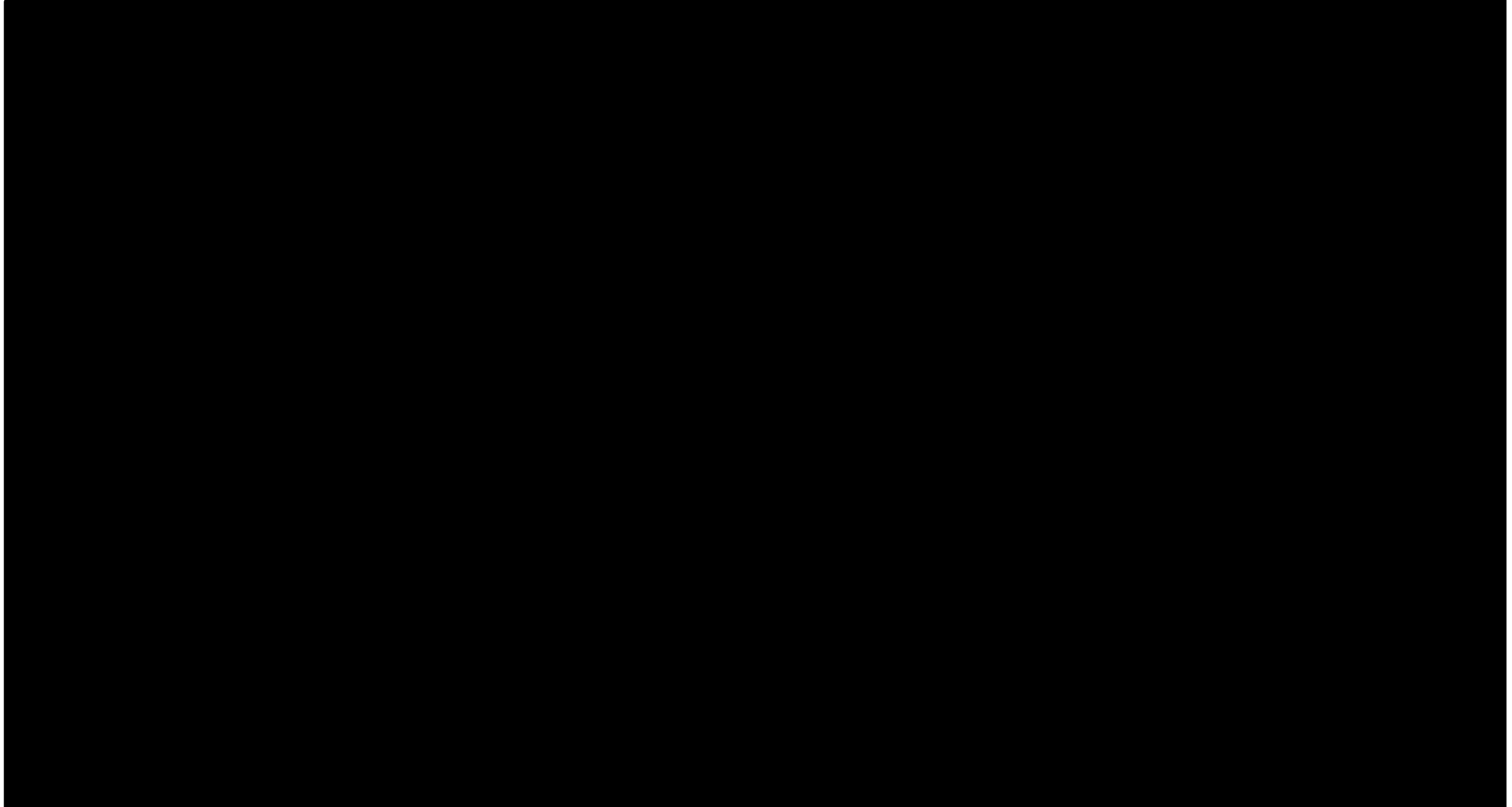
[REDACTED]

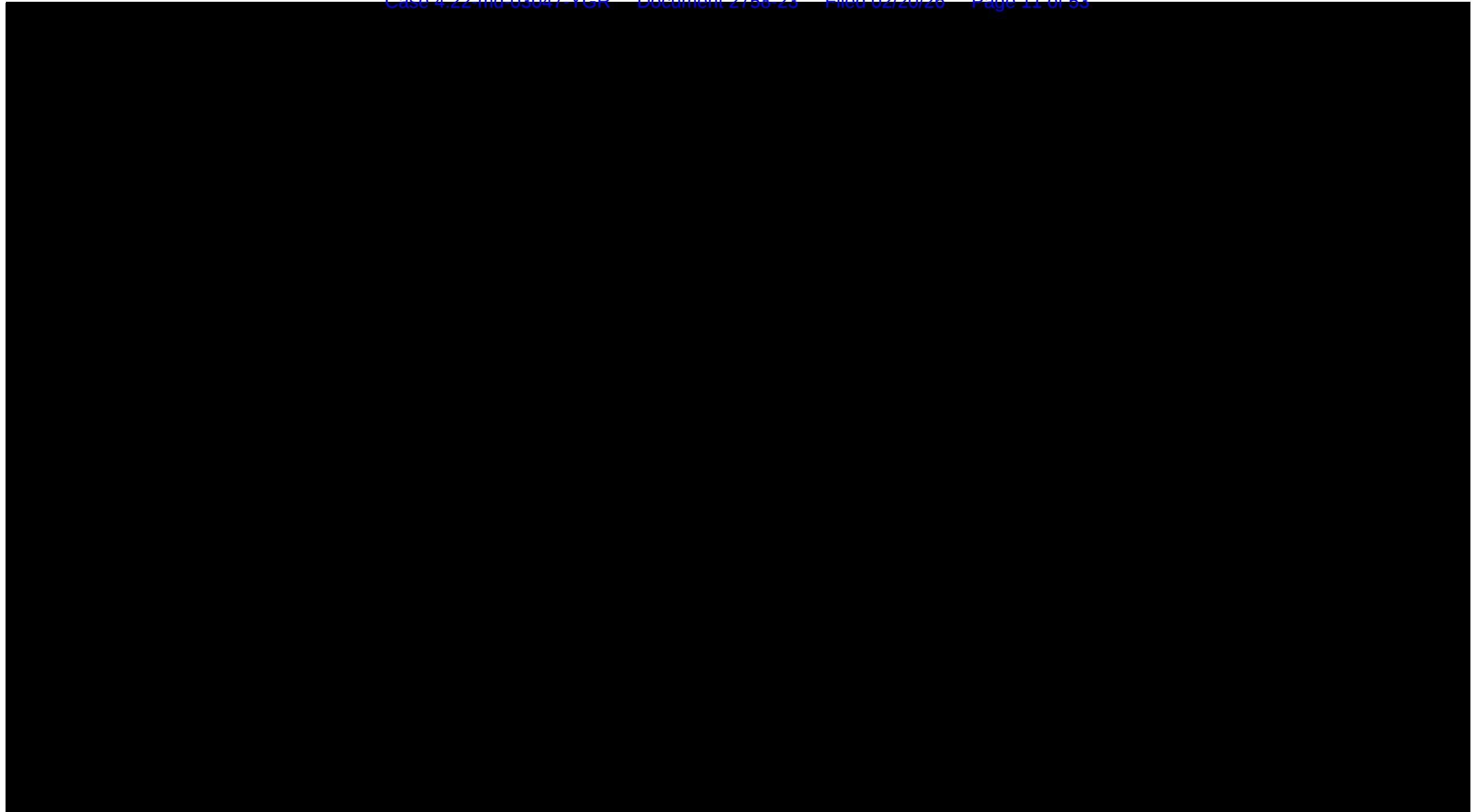
[REDACTED]

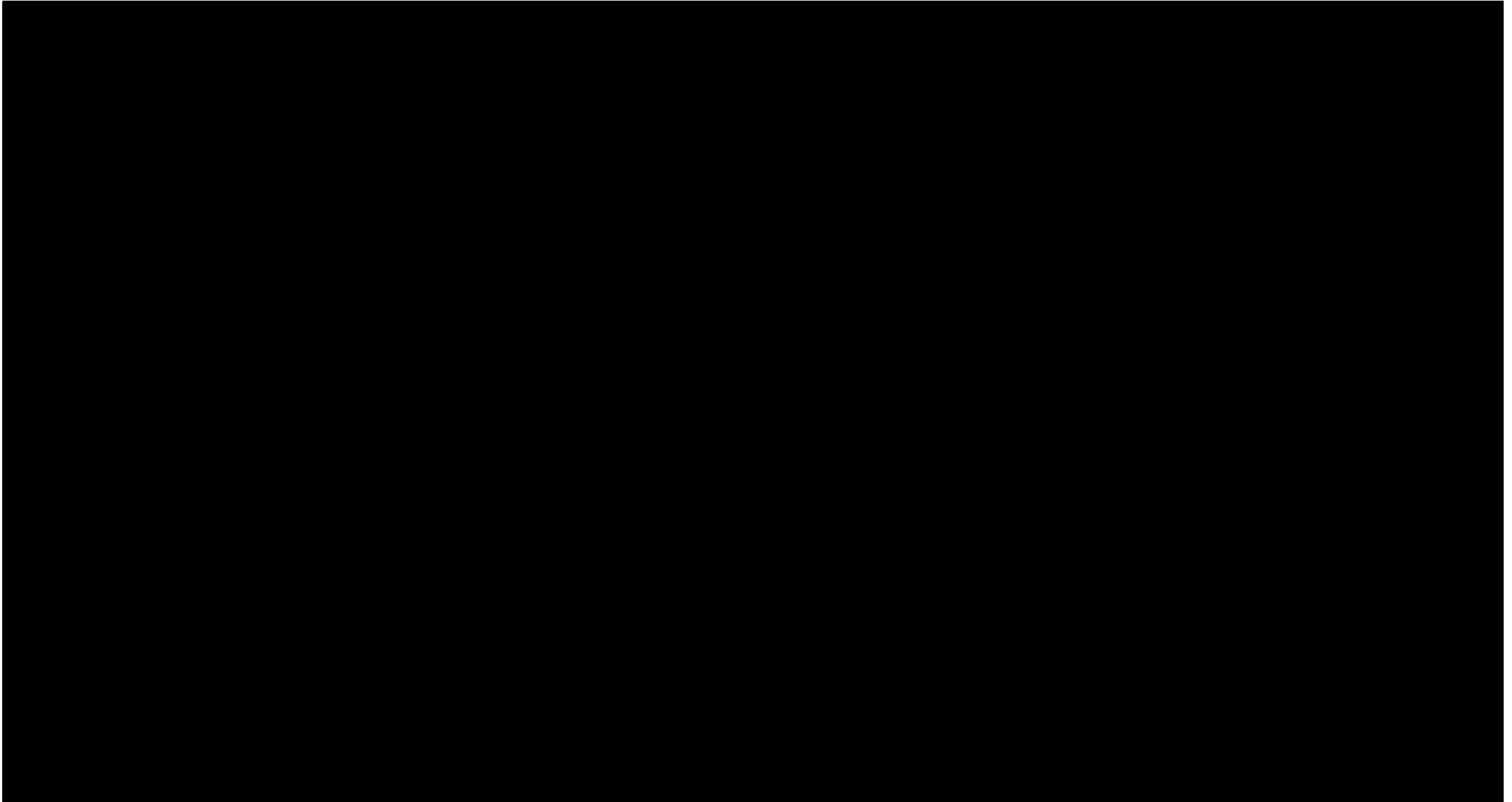










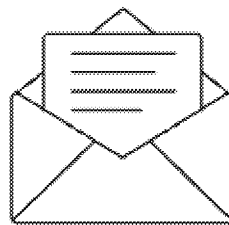


Testing & Cause Analysis

PRI Focus Areas



1. Discoverability



2. Inappropriate DMs



3. Inappropriate Comments

1. Discoverability - Test

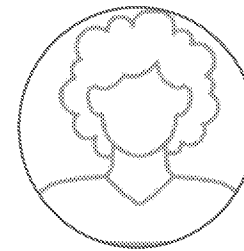
Hypothesis

We may be facilitating possible groomers finding young people through following, hashtags, explore, and search.

Test

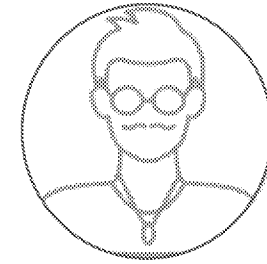
- Created two test users
 - One followed teen hashtags
 - One followed sexy teen accounts

Results



13rftc

Test User 1



gogo1980atx

Test User 2

1. Discoverability – Test User 1

Test user 1:

Followed teen related hashtags.

#teenmodel

#sugardaddy

#sexyteens

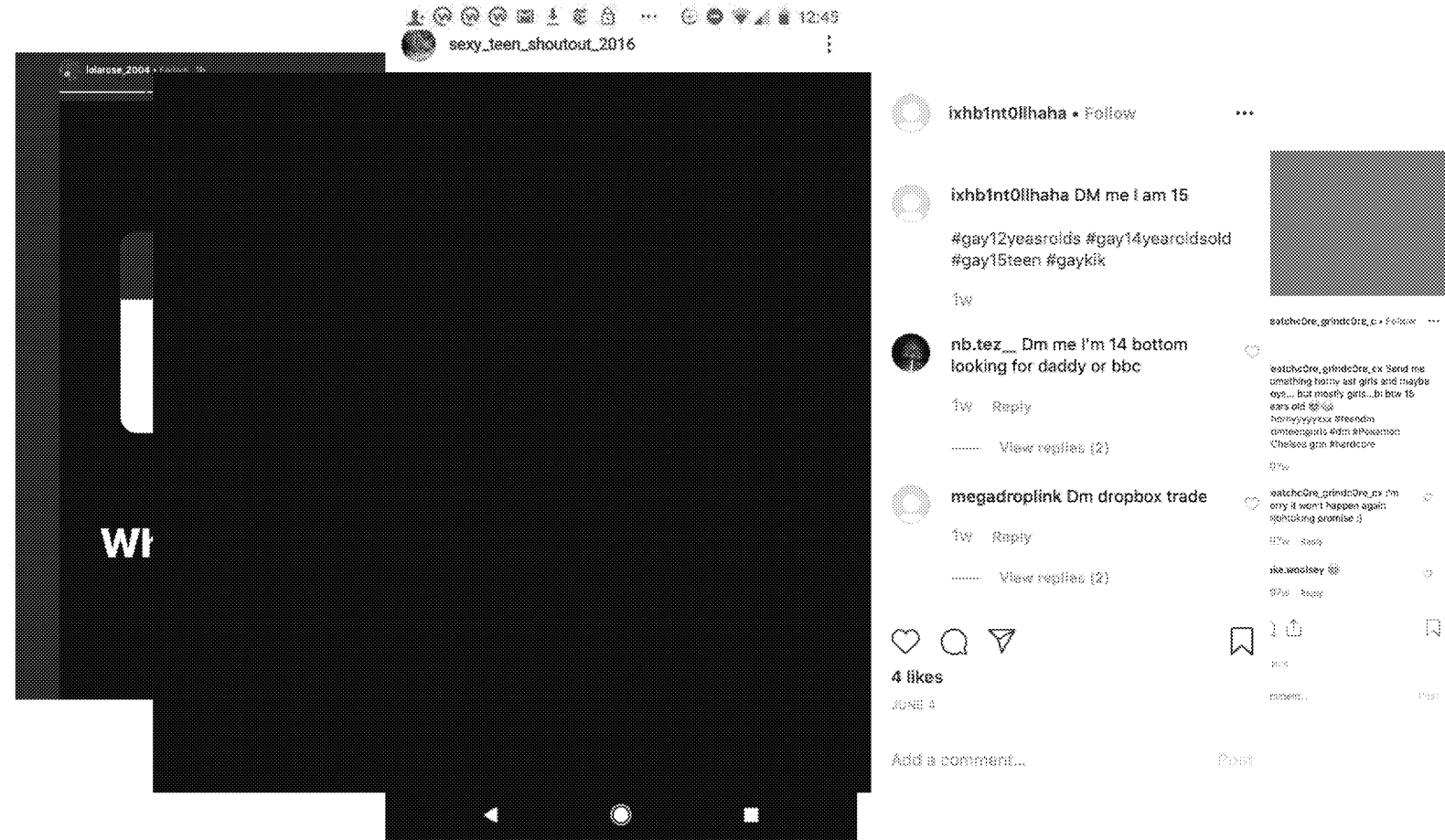
#gayboyssex

#sexyteengirls

#gayteen

#sexychicas

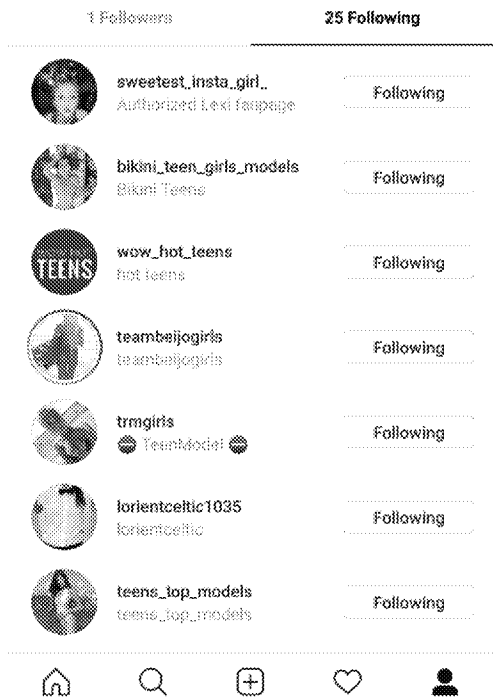
#teendm



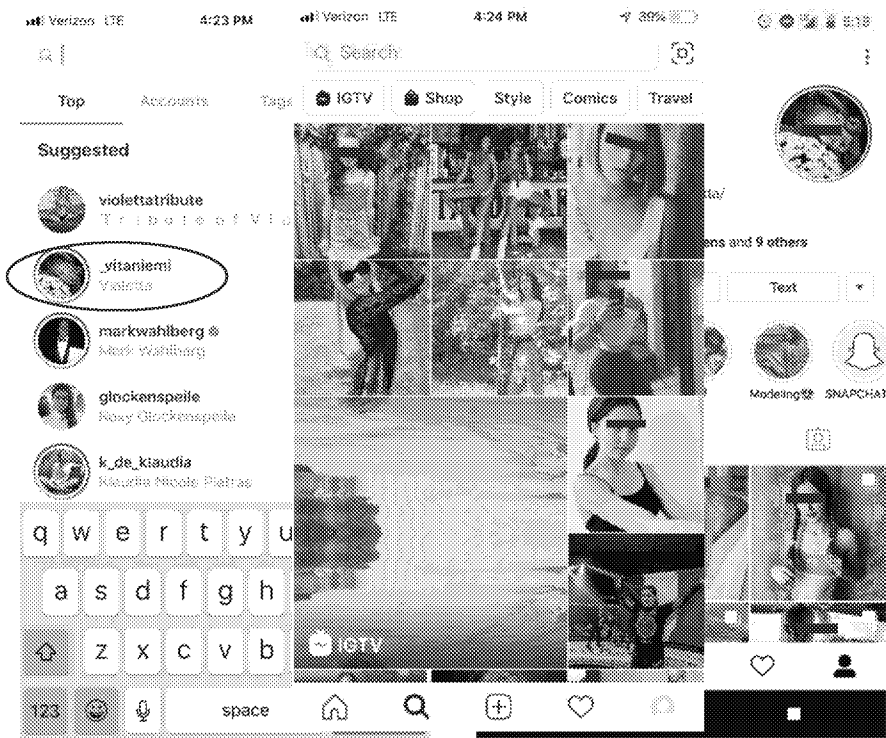
1. Discoverability – Test User 2

Test user 2:

Followed public “sexy teen” accounts.



Top Suggested Suggested Search Teen Account



1. Discoverability - Test

Hypothesis

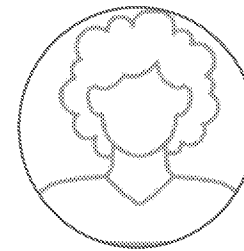
We may be facilitating possible groomers finding young people through following, hashtags, explore, and search.

Test

- Created two test users
 - One followed teen hashtags
 - One followed sexy teen accounts

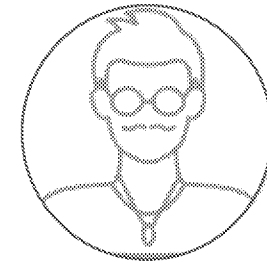
Results

- Following hashtags with minors did not result in content being served to us.
- IG recommended a minor through top suggested to an account engaged in groomer-esque behavior.



13rftc

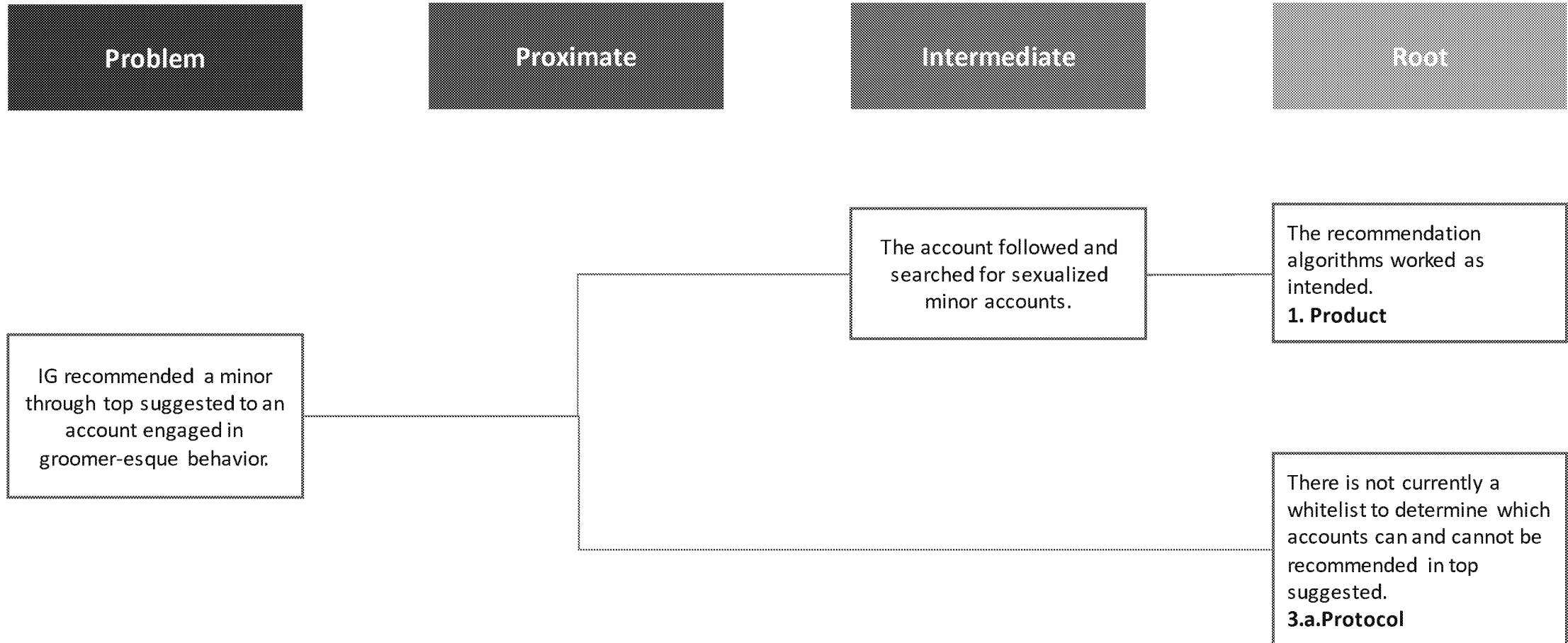
Test User 1



gogo1980atx

Test User 2

1. Discoverability

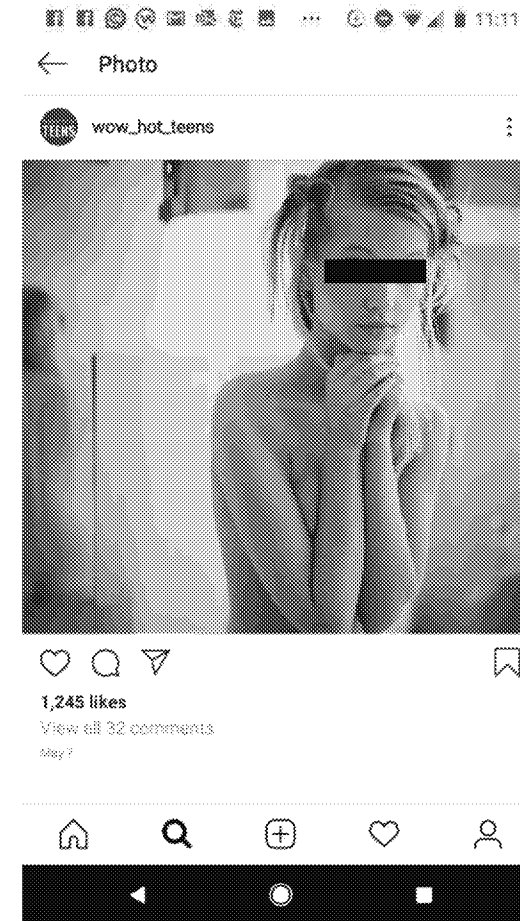


1. Discoverability - Recommendations for Groomers

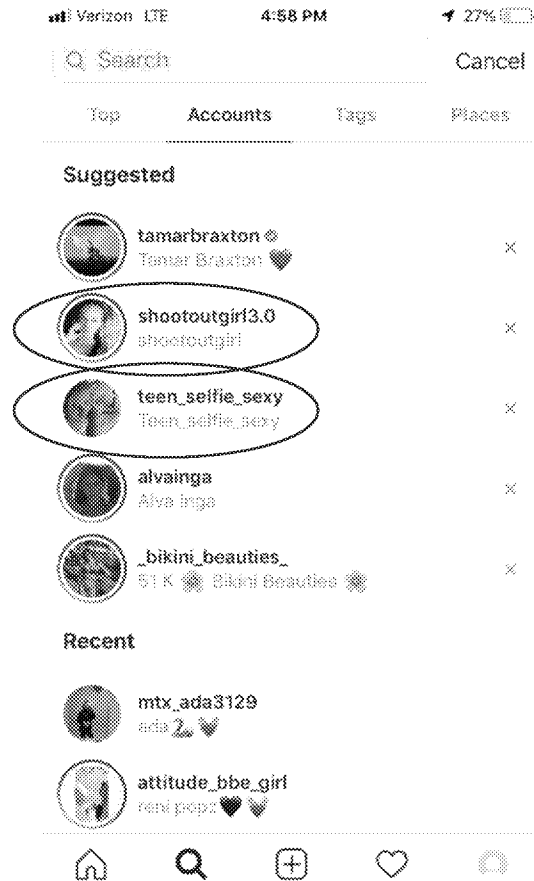
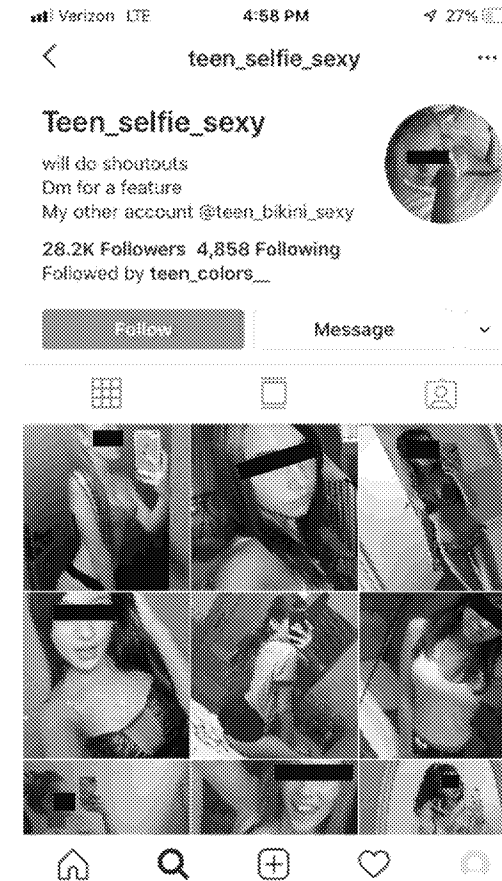
Overall IG: 7% of all follow recommendations to adults were minors

Groomers: 27% of all follow recommendations to groomers were minors

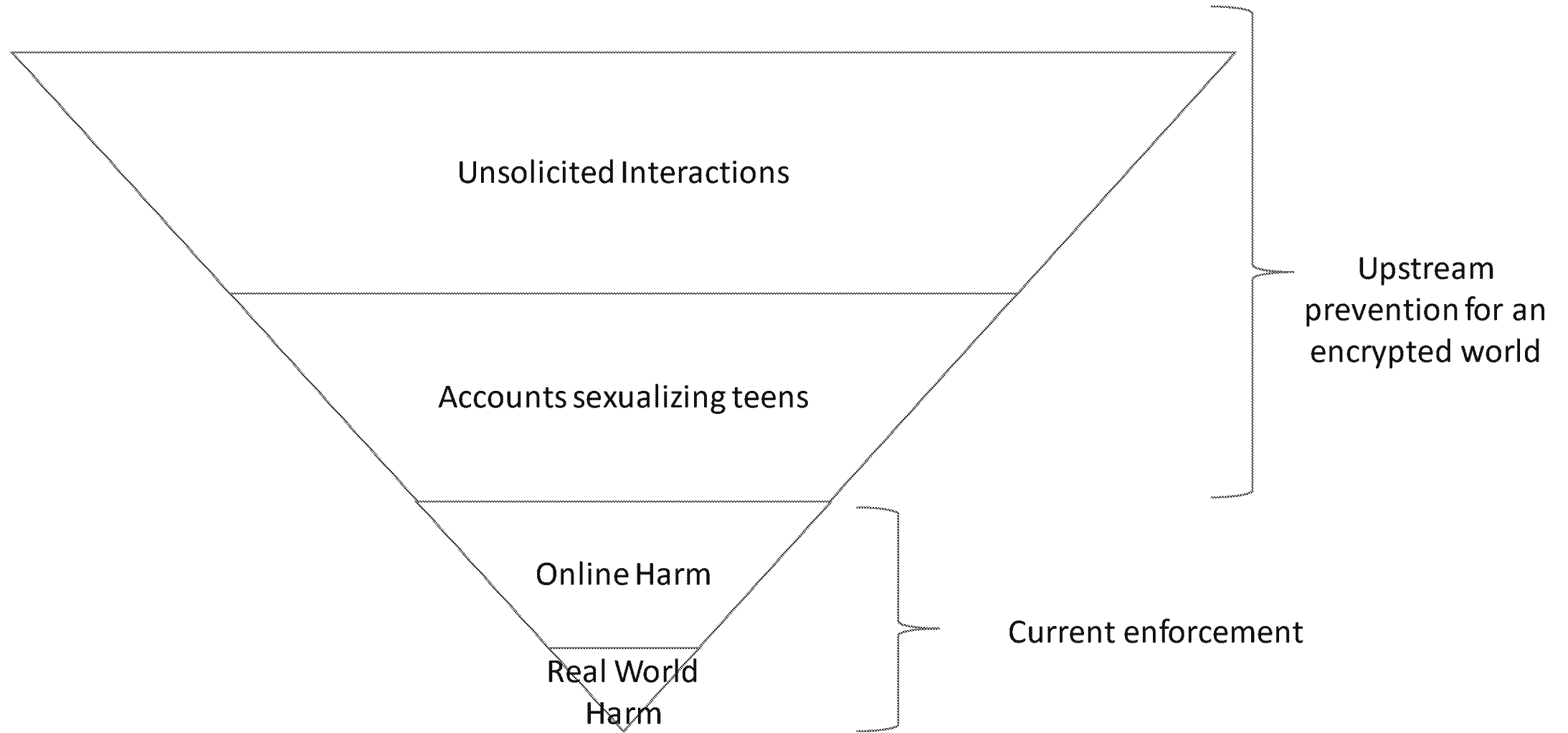
- We are recommending nearly 4X as many minors to groomers (nearly 2 million minors in the last 3 months)
- 22% of those recommendations resulted in a follow request



1. Discoverability – Sexy Teen Recommendations



1. Discoverability



1. Discoverability

