

## **AMENDED Exhibit 387**

# **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:** [Privileged] [/O=THEFACEBOOK/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=[Privileged]  
**Sent:** 1/22/2021 1:30:15 AM  
**To:** Alex Dow [Privileged]@fb.com]  
**Subject:** Re: Daisy Ownership  
**Attachments:** image001.png

Yeah! We are on fire today!

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**From:** Alex Dow <[Privileged]@fb.com>  
**Date:** Thursday, January 21, 2021 at 5:28 PM  
**To:** [Privileged]@fb.com>  
**Subject:** Re: Daisy Ownership

Thanks for adding me to this. I'm really happy to see Daisy Controls so close to launch!

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**From:** [Privileged]@fb.com>  
**Sent:** Thursday, January 21, 2021 5:21 PM  
**To:** Miki Rothschild [Privileged]@fb.com>; [Privileged]@fb.com>; [Privileged]@fb.com>; [Privileged]@fb.com>  
**Cc:** [Privileged]@fb.com>; [Privileged]@fb.com>; Charles Sismondo [Privileged]@fb.com>; Diego Castaneda [Privileged]@fb.com>; IG\_Well-being\_Leads [Privileged]@fb.com>; Shruti Bhutada [Privileged]@fb.com>; [Privileged]@fb.com>; [Privileged]@fb.com>; [Privileged]@fb.com>; Justin Cheng [Privileged]@fb.com>; Moira Burke [Privileged]@fb.com>; Alex Dow [Privileged]@fb.com>  
**Subject:** Re: Daisy Ownership

Thank you [Privileged] and team, for providing a detailed assessment. This looks good to me! Excited for you all to get this to the finish line!

I've added @Moira Burke and @Alex Dow on CDS who have been invested in this work in the past (in addition to @Justin Cheng). Please loop them in once you get going!

Thank you!

[Privileged]

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**From:** Miki Rothschild [Privileged]@fb.com>  
**Date:** Thursday, January 21, 2021 at 4:51 PM  
**To:** [Privileged]@fb.com>; [Privileged]@fb.com>; [Privileged]@fb.com>  
**Cc:** [Privileged]@fb.com>; [Privileged]@fb.com>; Charles Sismondo [Privileged]@fb.com>; Diego Castaneda [Privileged]@fb.com>; IG\_Well-being\_Leads [Privileged]@fb.com>; Shruti Bhutada [Privileged]@fb.com>; [Privileged]@fb.com>; [Privileged]@fb.com>; [Privileged]@fb.com>; Justin Cheng [Privileged]@fb.com>  
**Subject:** Re: Daisy Ownership

Sounds good, [Privileged] I'm glad you all took time to do the proper due diligence and feel confident and excited to take this on. I think shipping this will be a great win both externally for people (even if not as big of PR splash given the history) and internally to show our long term commitment and build momentum.

Thanks,  
Miki

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**From:** [REDACTED] **Privileged** @fb.com>  
**Date:** Thursday, January 21, 2021 at 4:47 PM  
**To:** [REDACTED] **Privileged** @fb.com>, [REDACTED] **Privileged** @fb.com>, Miki Rothschild  
**Privileged** @fb.com>  
**Cc:** [REDACTED] **Privileged** @fb.com>, [REDACTED] **Privileged** @fb.com>, Charles Sismondo <**Privileged** @fb.com>, Diego Castaneda **Privileged** @fb.com>, IG\_Well-being\_Leads **Privileged** @fb.com>, Shruti Bhutada **Privileged** @fb.com>, [REDACTED] **Privileged** @fb.com>, [REDACTED] **Privileged** @fb.com>, [REDACTED] **Privileged** @fb.com>, Justin Cheng **Privileged** @fb.com>  
**Subject:** Re: Daisy Ownership

Hi WB leads,

I'm circling back with responses to the questions you all raised about the Mental Well-being team picking up Daisy (i) Understanding why Daisy didn't ship previously and likelihood of shipping now (ii) Value of shipping Daisy Controls (iii) Impact on team's roadmap. Here is a summary of findings:

#### User Value of Pure Daisy

- Pure Daisy reduced negative social comparison in teen girls by ~6% (see below). The current proposal for Daisy Controls won't capture this full impact but will still be beneficial to users who use the control.

#### Why did Daisy Not ship and what has changed now

- **Previous ship decision:** Pure Daisy did not ship because it was not impactful from the lens that IG was evaluating previously (reduce creation flow abandonment and reducing deletion of posts with low like counts) and was pretty negative to FB metrics. Daisy controls is a way to mitigate the downsides of the ecosystem impact on both apps while delivering on a different value which is reducing negative social comparison.
- **Redefined Goals:** The redefined goals for Daisy are (i) graceful exit out of the current situation of 20% in Pure Daisy and rest without any Daisy experience for more than a year and (ii) Maintain as much of the value of Pure Daisy in reducing social comparison as possible
- **FB / IG Alignment:** There is support from [REDACTED] to land this across apps and get to the finish line. So there is a high likelihood that we can ship Daisy Controls this half.

#### Impact on team roadmap

- This project mainly needs PM/PMM support to get it across the finish line with possibly some UXR support on Ship decisions. I feel confident that we can protect the rest of the team to focus on P0 priorities in SSI/ED and SC.

#### More details below.

The team is aligned on picking up Daisy and landing it without disrupting the rest of our roadmap. We would like your support in picking this project up and running with it. Let us know if you have more questions.

Thanks

**Privileged**

## More Details

## 1. Redefined goals for IG Daisy

- [P0] We need a graceful exit out of the current situation of 20% in Pure Daisy and rest without any Daisy experience for more than a year.
- [P1] Maintain as much of the value of Pure Daisy in reducing social comparison as possible in an experience that can ship across both FB and IG.

## 2. Why did Daisy Not Ship for over a year?

- IG team started Daisy with the goal of **de-pressurizing sharing** in order to (i) reduce creation flow abandonment and (ii) reducing deletion of posts with low like counts.
- IG team was ahead within the FoA and wanted to ship Pure Daisy (removing like counts for all users). Cox/Mark wanted to have a coherent narrative and a co-ordinated launch across FoA for something as prominent as removing like counts across the board. FB team tested out Pure Daisy to see if that was a shippable experience.
- IG and FB teams had a joint Mark review once there was data from both apps:
  - IG team recommended shipping Pure Daisy even though the data for de-pressurizing sharing alone did not make a strong case. ***"The data alone does not make a strong case for shipping, so this is a judgement call. Our recommendation is to ship on Instagram and leverage the launch as an opportunity to put a stake in the ground about what Instagram stands for, and explain that we're focused on reducing the pressure young people feel to be perfect."***
  - FB recommended NOT shipping Pure Daisy for the following rationale. ***"Facebook's recommendation is not to launch Daisy because it does not seem that seeing the quantity of like/reaction counts is a top barrier to sharing nor a top concern for people, and it does not seem that Daisy moves this concern meaningfully either. Iterating to even get to a launchable state is a large effort if we want to preserve our ability to become/stay a leader in conversations/communities. Like counts are extremely low on the long list of problems we need to solve, and we prefer focusing on problems people care about more. We expect comms PR blowback and have a proposal on how to mitigate."***
  - Based on the above the decision was to hold off on shipping Pure Daisy

## 3. Daisy Impact on Negative Social Comparison

While the impact of negative social comparison was not evaluated in the original launch decision, Over the year people Pure Daisy has been shown to reduce negative comparison in the teen girls cohort (2.89 → 2.65, 6% decrease).

| Daisy and Social Comparison                  |   | Pure                              | Popular                        |
|----------------------------------------------|---|-----------------------------------|--------------------------------|
| Did Daisy reduce negative social comparison? | - | Yes<br>-0.10 ± 0.08, $p < 0.05$   | No<br>-0.01 ± 0.08, $p = 0.76$ |
| • Highly active teens                        | - | Maybe<br>-0.18 ± 0.20, $p = 0.07$ | No<br>0.09 ± 0.19, $p = 0.37$  |
| • Teen girls                                 | - | Yes<br>-0.24 ± 0.23, $p < 0.05$   | No<br>-0.09 ± 0.23, $p = 0.43$ |

- How did negative social comparison change in the average case?
  - In the "average" case, Pure Daisy decreases negative social comparison from 2.42 to 2.32 (2 = rarely; 3 = sometimes), i.e., a 2.5% decrease since negative social comparison is measured from 1 to 5..
  - Among teen girls, Pure Daisy decreases negative social comparison from 2.89 to 2.65, i.e., a 6% decrease
- Daisy Controls is an opt-in so it will not capture this full impact but it shows that if people use Daisy then it is beneficial to them.

#### 4. What is the confidence that Daisy Controls will ship?

- IG needs an exit out of the current situation of 20% of users in Pure Daisy and rest without any Daisy Experience. IG Leads aligned on Daisy Controls where users can opt into no like counts on the consumption side and post level likes opt-out on the producer side as the best way to land this project.
- Cox/Mark want to have a coherent narrative across FoA and have a public announcement at the same time, even if launches a staggered a bit. Adam aligned with [REDACTED] on landing this across apps. We met with FB app team and this seems like a reasonable solution that won't have a negative impact on FB.
- Given all this we think there is a reasonable path to landing Daisy Controls this half.

#### 3. Current Plan and Trade-offs

- Daisy Controls is staffed with 3 engineers from different teams who will get the project to a place where we can run an experiment in 3 weeks. There is a DS also helping with this test.
- The project needs PM/PMM bandwidth to ordinate across apps and work through the reviews to land this project. We may need some UXR support to make final ship/no ship decisions. We can incorporate one engineer into the project.
- We don't expect this project to impact our other P0 priorities on SSI/ED and Social Comparison.

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From: [REDACTED]@fb.com>  
 Date: Tuesday, January 12, 2021 at 12:02 PM  
 To: [REDACTED] Privileged @fb.com>, [REDACTED]@fb.com>, Miki Rothschild  
 Privileged @fb.com>  
 Cc: [REDACTED]@fb.com>, [REDACTED] Privileged @fb.com>, Charles Sismondo Privileged @fb.com>, Diego Castaneda Privileged @fb.com>, IG\_Well-being\_Leads Privileged @fb.com>, Shruti Bhutada Privileged @fb.com>  
 Subject: Re: Daisy Ownership

Just in case it's useful for others here, past Daisy context. I actually think all these reads are quite useful even beyond Daisy, and beyond Mental Well-being, but that's just me 😊

In December 2019, Vishal posted the Instagram m-team review ([https://fb.workplace.com/permalink.php?story\\_fbid=556853428425115&id=100023013870040](https://fb.workplace.com/permalink.php?story_fbid=556853428425115&id=100023013870040)) and linked to the full doc shared with Zuck (<https://fb.quip.com/lrFbAep7Cu0F>).

"Imagine a place where it's safe to express yourself. We will continue our anti-bullying drumbeat, keep executing on core integrity problems with a focus on the US election, ship Daisy (hiding like counts), and identify a new area to lead in, likely in the teen well-being space." – we will ship Daisy... (And fun to see the teen well-being a year ago! I guess 2020 threw some curveballs...)







