

AMENDED Exhibit 274

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: Karina Newton [/O=THEFACEBOOK/OU=EXTERNAL (FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN=[REDACTED]]
Sent: 3/4/2020 3:34:31 AM
To: Margaret Stewart [REDACTED]; Pratiti Raychoudhury [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
[REDACTED]
CC: [REDACTED]; Monika Bickert [REDACTED]; Molly Cutler [REDACTED]
Subject: Re: [HOLD] WKLY Cross-Family Reviews | Plastic Surgery AR Effects + Camera Settings Policies
Attachments: image002.jpg

Thanks Margaret, adding [REDACTED] to this thread (she manages policy and review for first party IG effects and has been working closely with [REDACTED] and [REDACTED] for 3rd party policies that impact what shows up on IG) and would love to have one of us join for IG perspective going into this meeting.

On the age points below will add two notes for IG that may become relevant/want to ensure there is awareness of — first is that we have very limited age information on IG (we only started collecting age in December at registration) so age gating solutions are less desirable. Secondly, teens are some of the biggest users of these filters (and teen girls in particular) on IG so giving them an incentive to lie about their age to get access is very problematic from an integrity and policy standpoint.

From: Margaret Stewart [REDACTED] >
Sent: Tuesday, March 3, 2020 6:05 PM
To: Pratiti Raychoudhury; [REDACTED]; [REDACTED]; [REDACTED]; Karina Newton; [REDACTED]; [REDACTED]; [REDACTED]
Cc: [REDACTED]; [REDACTED]; Monika Bickert; Molly Cutler
Subject: Re: [HOLD] WKLY Cross-Family Reviews | Plastic Surgery AR Effects + Camera Settings Policies

- + [REDACTED] for scheduling

I don't think we need to have everyone on the thread meet. Maybe just [REDACTED], [REDACTED], Jennifer, pratiti and myself? This is just to ensure that we know who is on point for creating the new pre-read and making sure we have the right revisions by end of this week so we can socialize early next week.

Also FYI Jennifer is planning a new set of research activities to augment what we already know. Having pratiti review those ideas would be great!

Margaret Gould Stewart
VP of Product Design
Facebook, Inc

From: Pratiti Raychoudhury [REDACTED] >
Sent: Monday, March 2, 2020 10:35 AM
To: [REDACTED] >; Margaret Stewart [REDACTED] >; [REDACTED] >; [REDACTED] >; Karina Newton [REDACTED] >; [REDACTED] >
Cc: [REDACTED] >; [REDACTED] >; Monika Bickert [REDACTED] >; Molly Cutler [REDACTED] >
Subject: RE: [HOLD] WKLY Cross-Family Reviews | Plastic Surgery AR Effects + Camera Settings Policies

Adding a couple of questions. The questions that Schrep has raised are also top of mind for me. Other things:

- For the Decisions (First bullet) – (Should we continue to prohibit the creation of Cosmetic Surgery Effects by Developers on Spark AR?) – are we recommending Global, US and UK or some other markets. It will be great to call it out. I see Monica is already on the distro list. We should make sure that i18n's perspective is being captured here.
- Are there any counterfactuals? All the research/ press points to the down-side – which I understand. Do we have any data on why people are using it? What would happen to them if it goes away.
- Similarly any counterfactuals from the Developer community?
 - (There are some counterfactuals mentioned in the Background doc - AR Cosmetic Surgery Effects – that we should pull up).
- How much of the research was US/UK vs. Global. Are there any differences in country?
 - I would not say “evidence” on page 3 (Evidence suggests that the connection between use of photo filters and unrealistic beauty expectations is a rising global issue, including China, South Korea, the UK, and the US). Evidence would immediately connote that we have data. We should just say that we are already seeing press on....
 - Age-gate: While we have already called out the risks, there are a couple of other things to keep in mind –
 - (Based on Developmental Psychology) It's misaligned with teens' development and needs for autonomy establishment. So basically we'd be telling them you're not mature enough to handle this info and it's not great for you, but we are letting adults see it (you can read more here - https://scholar.google.com/scholar?q=teens%20social%20media%20autonomy&hl=en&as_sdt=0&as_vis=1&oi=scholar#d=gs_qabs&u=%23p%3DEbsuV2MMUJgI)
 - Because we are seeing some of our well-being related efforts are effecting teens more disproportionately, we keep recommending this as a potential path. The problem is that soon we'll have several things that we will recommend (as a company) to age-gate and it if we do all of them we'll have a very stripped down version for Teens

From: [REDACTED] >
Sent: Monday, March 2, 2020 9:43 AM
To: Margaret Stewart [REDACTED] >; [REDACTED] >; Karina Newton [REDACTED] >; Pratiti Raychoudhury [REDACTED] >
Cc: [REDACTED] >; [REDACTED] >; Monika Bickert [REDACTED] >; Molly Cutler [REDACTED] >
Subject: Re: [HOLD] WKLY Cross-Family Reviews | Plastic Surgery AR Effects + Camera Settings Policies

+ [REDACTED] and [REDACTED]

From: Margaret Stewart [REDACTED] >
Date: Monday, March 2, 2020 at 7:04 AM
To: [REDACTED] >, [REDACTED] >, [REDACTED] >, Karina Newton [REDACTED] >, Pratiti Raychoudhury <[REDACTED]>
Cc: [REDACTED] >, [REDACTED] >, Monika Bickert [REDACTED] >, Molly Cutler [REDACTED] >
Subject: Re: [HOLD] WKLY Cross-Family Reviews | Plastic Surgery AR Effects + Camera Settings Policies

Hey there, in preparation for this meeting on the 17th, I'd like to make sure Schrep and Pratiti are fully briefed on where we are at with respect to all of this and that Pratiti can hopefully help us socialize it in advance with Javi and Alex Schultz.

Some of the things that Schrep wanted to understand:

- An overview of the cultural differences in attitudes towards these effects (assuming he is talking about NA/Europe v APAC, didn't get more specific than that, I can circle back if needed)
- Any analysis of effects on the business (growth/revenue) that the current restrictions are having
- The state of current research on possible negative effects
- A sense of when we might have more reliable research and in what time frame to influence these decisions

Not sure who should be on point to gather these. Should some of us have a meeting this week to confirm so we have it all well in advance of the meeting?

Thanks,
 Margaret

Margaret Gould Stewart
 VP of Product Design
 Facebook, Inc

From: Margaret Stewart [REDACTED] >
Sent: Wednesday, February 26, 2020 2:19 PM
To: [REDACTED] >; [REDACTED] >; [REDACTED] >; Karina Newton [REDACTED] >; Pratiti Raychoudhury <[REDACTED]>
Cc: [REDACTED] >; [REDACTED] >; Monika Bickert [REDACTED] >; Molly Cutler [REDACTED] >
Subject: Re: [HOLD] WKLY Cross-Family Reviews | Plastic Surgery AR Effects + Camera Settings Policies

+ [REDACTED] who I would like to have visibility on all of this as she can be very helpful in socializing with Alex and Javi as well as pressure testing the research data.









