

AMENDED Exhibit 44

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: Naomi Gleit [/O=THEFACEBOOK/OU=EXTERNAL (FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN=[REDACTED]]
Sent: 11/7/2016 7:34:55 PM
To: Guy Rosen [REDACTED]
Subject: Re: FYI: Teen Growth!!

Fyi [REDACTED] is going to be joining as the pm lead over [REDACTED] on teens fyi

Also re this – does that mean you need to hire someone a PM for teens in jan?

How the H1 2017 Strategic Focus will work:

1. Participating teams will take a specific goal for teens. Our overall company goal is total teen time spent, which is MAP * MAP/DAP * TS/DAP.
2. The Teens Team has a pool of headcount to allocate to partner teams who take on goals. We'd love to give some of this HC to you J
3. Our ask to partner teams are:
 - a. Immediately staff (January) teens projects, and use Teens headcount as backfill for lower priority projects.
 - b. Staff H1 projects at least at 1.5X teens headcount. E.g. in return for 8 headcount, staff 12 people during H1.
 - c. Plan for at least the actual Teens heads (8, in this example) to be working on teens goals for H2 of 2017 as well.
4. We'd like to figure out by mid-December H1-H2 reviews who we'll be working with, so the upcoming 3-4 weeks will be pretty busy!
5. Worth noting: We're heavily investing in improving our ability to model actual age of teens, which we expect to ship as an operational deltoid/dashboard facet in H1. None of this is live yet, but it's reasonable to make product plans and set H1 goals against the assumption that this will be very robust at some point during Q1.

From: Guy Rosen <[REDACTED]>
Date: Monday, November 7, 2016 at 11:18 AM
To: Core Growth Circle <[REDACTED]>
Subject: Fwd: FYI: Teen Growth!!

fyi

Begin forwarded message:

From: [REDACTED] <[REDACTED]>
Subject: FYI: Teen Growth!!
Date: November 7, 2016 at 11:09:02 AM PST
To: Guy Rosen <[REDACTED]>

Guy,

I am just about to send out a general email to several PM leads to ask for help on our H1 company-wide strategic focus on teens. I'm sending you this individual email to set a little more context on how I imagine us working with Growth.

Context:

Mark has decided that the top priority for the company in H1 2017 is teens. Teens roughly break down into US (in bad shape, esp. iOS) EU (OK, but under threat from Snapchat) and RoW (doing great). We are prioritizing both US-focused efforts to rebuild the FB and IG teen graphs, and RoW efforts to help teens manage and segment their graphs into peers (other teens) and non-peers (parents, relatives).

How we may partner with Growth:

1. Global PYMK: We believe that we can generate a bunch of new value by emphasizing teen:teen connections in PYMK. We are in active discussions with [REDACTED] [REDACTED] about how to run H2 experiments to get some baselines. This is an area that can significantly change the content that teens see in feed, and their perception of the "friendliness" of their overall FB experience.
2. RoW Graph segmentation: We'd like to figure out a way for teens newly joining FB to indicate whether a person who they are friending is or is not a peer (aka another teen). We believe that helping teens to manage their graph from their first days on FB will pay significant benefits downstream. This obviously introduces friction into the process of onboarding and we'd like to work with you to figure out how best to do this.
3. Global Graph cleanup. For teens currently on FB, we'd like to use algorithmic or UEX mechanisms to help them better manage who they share to and interact with. This is WIP with Friend Sharing but from a graph perspective your involvement would be helpful.
4. USA Classical growth tactics: We have emerging data science insights that Facebook usage in the US is doing great at "Android High Schools" and terribly everywhere else: [https://www.facebook.com/notes/\[REDACTED\]/high-schools-interfaces-and-products/358016481209950](https://www.facebook.com/notes/[REDACTED]/high-schools-interfaces-and-products/358016481209950) We believe that there's an opportunity to do classical FB growth on a high-school-by-high-school basis, figuring out second-order graph effects like public-private high school crossovers, athletic leagues, geographic proximity, etc. Instagram is less far along with their own geographic analysis, but we believe that IG is showing similar geographic effects, and there may be very useful partnership opportunities between teens, FB growth, and IG growth.

We've had conversations with [REDACTED], [REDACTED], and [REDACTED], and we're setting up a discussion with [REDACTED] at IG in the next few days.

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Next Steps:

Let's figure out the best way(s) to coordinate and plan. In the meantime we're actively planning H2 PYMK experiments with [REDACTED].

Thanks,

[REDACTED]