

## **AMENDED Exhibit 1011**

### **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







b. Update: actually, it looks like when the user is signed out, [REDACTED]  
 [REDACTED] ([HYPERLINK]  
 [REDACTED]

2. Is this worth our time to fix? I estimate this will take about two SWE-weeks to implement and test, then another SWE-month to roll out safely. MRM tends to be trivially easy for students to bypass if they clear cookies, sign out, open an incognito tab, or switch devices, so generally it's not a high priority to make these blocks completely foolproof. The primary motivation for this fix would be to mitigate major outages or avoid potential complaints from Workspace admins.

a. [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

b. Update: see #1 above

c. Update: Note that actually [REDACTED]  
 [REDACTED] ([HYPERLINK]  
 [REDACTED]

3. In case [REDACTED]  
 [REDACTED]?

a. As currently described above, no it should not. [REDACTED]  
 [REDACTED]

**Commented [20]:** This is a fair question. Would falling back to signed out parity make this project easier here? Otherwise, maybe we might consider putting this project on the backlog.

1 total reaction

[REDACTED] reacted with + at 2023-07-10 13:43 PM

**Commented [21]:** imho this isn't worth 2 SWE months of work. If Workspace cares deeply about perfect MRM coverage, then they should pass [REDACTED]

**Commented [22]:** As far as [REDACTED] was able to see, the current signed out content policy is simply to block mature content, which may be sufficient for now.

Yeah as I've looked more at this, agree this project probably is pretty low priority.

**Commented [23]:** This only works on Chrome, and only where 3p cookies are enabled, right?

**Commented [24]:** [REDACTED]

**Commented [25]:** Workspace should already be setting the expectation that MRM doesn't work in all cases (you call out multiple unsolvable edge cases above). Imo this seems like a negligible risk

**Commented [26]:** [REDACTED] This seems perhaps not ideal? In my view, certainly no reason to have a hard dependency on [REDACTED].

**Commented [27]:** Oh sorry this was not clear. You're right, it's actually currently ONLY a hard requirement for Dashers: H [REDACTED]