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May 31, 2024

## VIA E-MAIL

## *Confidential Communication Attorney Work Product*

Mr. Michael Lopes Serrao  
Superintendent  
Parkrose School District 3  
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Re: Attorney Advertising - Social Media Mental Health Lawsuit

Dear Mr. Lopes Serrao:

As you may have heard in the news, over 800 school districts across the country have filed lawsuits against major social media companies to hold those companies accountable for their part in causing the mental health crisis among American youth and to recover costs districts have incurred addressing the myriad challenges this crisis presents.

Our law firm filed the first such lawsuit on behalf of Seattle Public Schools, and we have since filed similar lawsuits on behalf of a number of other school districts, including Portland Public Schools, Salem-Keizer Public Schools, Oakland Unified School District (California), Elk Grove Unified School District (California), Chandler Unified School District (Arizona), Mesa Public Schools (Arizona), Paradise Valley Unified School District (Arizona), and Racine Unified School District (Wisconsin).

In our conversations with school districts across the country, we have heard how social media use impacts classroom instruction, strains mental health and administrative resources, damages educator relationships with parents, and even results in property damage (due to TikTok challenges). Unfortunately, none of this is surprising. The Surgeon General recently issued an [advisory](#) stating “there are ample indicators that social media can also have a profound risk of harm to the mental health and well-being of children and adolescents.” As reported by [The New York Times](#), “[t]he advisory noted that technology companies have a vested interest in keeping

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users online, and that they use tactics that entice people to engage in addictive-like behaviors.” Similarly, the American Psychological Association issued an [advisory](#), explaining social media should be tailored to youths’ developmental capabilities and that social media designs for adults may not be appropriate for children.

The lawsuits our firm has filed describe how social media companies intentionally design, market, and operate their exploitive social media platforms to be extremely popular with youth users, despite research confirming the severe and wide-ranging effects of social media on youth mental health. The lawsuits’ goal is not to eliminate social media, but to change how these companies operate their platforms and require them to contribute to the increasing costs that schools are forced to bear in response to the increasing mental health needs of their students.

School districts are on the front line of this mental health emergency. Public schools and school-based clinics are one of the main providers of mental health services for school-aged children across the country. The demand for these services far outstrips their availability, and that demand keeps growing.

Keller Rohrback is passionate about litigation that serves the public interest. We are a national law firm experienced in representing governmental entities to address complex public health challenges by seeking redress for health, environmental, and financial harms caused by corporate malfeasance. We are bringing these cases on a contingent fee basis, meaning any attorneys’ fees would come from defendants and not from the school districts. This means that, as our clients, school districts are not liable for fees as the litigation progresses. Keller Rohrback will only collect a fee if the school district receives money resulting from a judgment or settlement.

We would welcome the opportunity to speak with you at your convenience about Parkrose School District 3’s potential claims.

Sincerely,



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