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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KING COUNTY**

KELLY STONELAKE, an individual,
Plaintiff,

v.

META Platforms, Inc. a Delaware
Corporation

Defendant.

No.

COMPLAINT FOR DAMAGES

I. INTRODUCTION

Plaintiff Kelly Stonelake brings this action against her former employer Meta Platforms Inc. ("Meta") for sex discrimination and retaliation under the Washington Law Against Discrimination, RCW 49.60 et. seq., and retaliation for opposing Meta's illegal activity and violations of public policy.

Ms. Stonelake had a distinguished 15-year career at Meta, rising through the ranks while consistently delivering exceptional results. From 2021 to 2022, she led critical third-party data protection and compliance initiatives that helped Meta avoid \$10 billion in potential FTC fines and protected users from another Cambridge Analytica, until she was retaliated against for surfacing safety issues to the otherwise all male leadership team, despite this being a core expectation of her job. This became the final

1 straw in Ms. Stonelake's experience of persistent discrimination and different standards
2 than her male colleagues throughout her career.

3 The pattern began early: in 2011, when she was 23, just three months after
4 attending her wedding, Ms. Stonelake's boss sexually assaulted her during a business
5 trip and on a separate business trip told her she wouldn't be promoted unless she had
6 sex with him. She moved from California to Washington to escape him.

7 Over the next decade, she rose in the ranks and excelled in her roles at Meta,
8 but this pattern continued: over the next thirteen years, Ms. Stonelake would go on to
9 experience offensive, sexist comments from colleagues and clients and be held to
10 different standards by multiple other male bosses in separate organizations within
11 Meta. The company dismissed her complaints and took no action. A decade later, in
12 2020, after she questioned her boss's "Blue Lives Matter" profile picture following
13 George Floyd's murder due to the negative impact she feared it would have on their
14 large and diverse team, he met her with immediate hostility and retaliation and blocked
15 her from an earned promotion.

16 In 2022, while leading Meta's Horizon virtual reality platform expansion, Ms.
17 Stonelake identified serious product stability issues and product safety issues that put
18 children at risk of immediate exposure to hate speech, sexual harassment, and
19 bullying. Ms. Stonelake was being asked to lead the "go to market" on a.) expanding
20 Horizon to teens, b.) expanding Horizon internationally, and c.) expanding Horizon onto
21 mobile surfaces like phones and tablets, but the product was not ready for these steps
22 and therefore Ms. Stonelake's job required her to intervene.

23 When she supported another female leader's call for a quality pause on the roll-
24 out, Meta's Horizon Leadership Team first ordered Ms. Stonelake to silence her female
25 colleague. When she refused and instead supported this colleague's concerns, they
26 excluded her from the weekly leadership meetings. Not long after, the same leadership

1 team, now all-male in her absence, implemented the pause she had advocated for,
2 without acknowledgment. They branded it a "Quality Lockdown" and made public
3 statements, but failed to mention the safety issues.

4 In January 2023, Ms. Stonelake was explicitly told she would be denied a
5 promotion because documenting her achievements would expose failures by male
6 leaders whose support she needed. Approximately a year earlier, she had been told
7 the same thing, after stepping in to lead the company through a crisis not of her
8 making. The mounting pressure of years of relentlessly working to advance Meta's
9 interest, while facing increasing marginalization within the company due to her fights for
10 user safety and a fair workplace required Ms. Stonelake to take emergency medical
11 leave in February 2023 due to feelings of depression and the sudden, strong desire to
12 end her life. While completing an intensive outpatient program to address the
13 suicidality that began as a result of her years of treatment at Meta, she was notified in
14 September of 2023 that she would be laid off, and her final day at Meta was in January
15 2024.

16 This case seeks to expose and reform Meta's toxic pattern of silencing women
17 who identify problems and protect users, then retaliating against them for doing their
18 jobs. When companies punish women for surfacing critical safety and compliance
19 issues, it creates dangerous blind spots that ultimately harm the most vulnerable users.
20 Through this action, Ms. Stonelake aims to create accountability and systemic change
21 to ensure other women at Meta do not face the same impossible choice between
22 career advancement and doing what's right.

23 II. PARTIES, JURISDICTION, AND VENUE

24 1. Plaintiff Kelly Stonelake is a former employee of Defendant Meta
25 Platforms, Inc. She resides in King County, Washington and was employed by
26 Defendant Meta in King County.

1 **B. Sex harassment began almost immediately and Ms. Stonelake was**
2 **eventually forced to transfer to a role in Seattle to escape a harassing boss**

3 9. Like many early Facebook employees, Ms. Stonelake was witness to the
4 rampant and unmanaged discrimination and unprofessionalism across the company,
5 which fell hardest on the few female employees in a male-dominated workplace.

6 10. In her first week, a group of male engineers started a bet over how long it
7 would take for Ms. Stonelake and her boyfriend to break up.

8 11. Ms. Stonelake overheard recruiting coordinators boast about reading job
9 candidates' personal Facebook messages to determine if they were "legit or not."

10 12. In her first role, Ms. Stonelake was assigned a mentor, "NG," who Ms.
11 Stonelake learned regularly took another of his mentees up to the roof to hook up. Ms.
12 Stonelake kept her distance and did not take advantage of this mentorship.

13 13. A drunk male colleague, "NS," who had been the ring-leader of the bet
14 over whether Ms. Stonelake and her boyfriend would break up, grabbed Ms.
15 Stonelake's crotch over her pants at a weekly company sanctioned on-campus drinking
16 event called "League" regularly attended by Mark Zuckerberg and Andrew Bosworth,
17 as well as other Facebook executives. When she reacted, NS called it an accident and
18 shamed Ms. Stonelake for reacting.

19 14. At one point, another male colleague, "MJ," 20 years her senior, told her
20 not to speak during a meeting that she had prepared and was set to lead, ending his
21 patronizing statement with "Don't say a word. Thanks, doll." Then, after he made
22 humiliating comments about her and undermined her authority and credibility
23 throughout the meeting with high-level partners at Intel, (e.g. referring to Ms Stonelake
24 as a 'gum chewer who couldn't even buy pencils' and 'what does she know?!'), he did
25 a 180 and handed it over to her, in front of the clients. Ms. Stonelake was surprised and
26 confused, but successfully led the meeting

1 15. Other Facebook executives who had attended the meeting later
2 complimented her performance. Meanwhile, MJ immediately called her manager, "MF,"
3 stating that she seemed "nervous" while presenting and should be fired.

4 16. When Ms. Stonelake disclosed MJ's behavior to MF, he brushed off her
5 complaints. He told her to focus more on what she could do better than on what MJ
6 could do differently. Ms. Stonelake asked MF to call MJ, and MF said that she needed
7 to do it herself. Ms. Stonelake had a phone conversation with MJ, where he both
8 apologized and marveled that she was even upset.

9 17. In hindsight, it was not a surprise that MF brushed off Ms. Stonelake's
10 complaints of sex harassment. Because shortly thereafter, MF himself began to
11 sexually harass her.

12 18. In 2011, three months after attending Ms. Stonelake's wedding as an
13 invited guest, MF orchestrated a series of escalating harassment events during a
14 business trip to Seattle. First, he took Ms. Stonelake to dinner at Umi Sushi, where he
15 bought and poured wine for her, praised her capabilities and brilliance, and made
16 disturbing personal revelations, including that he had a second child only so his first
17 would not be alone when he left his wife, and that his daughter's name came from a
18 location in Hawaii where he'd had a fling, and that his wife didn't know.
19 After dinner, MF escorted Ms. Stonelake to her room at the W Hotel Seattle under the
20 pretense of reviewing materials for her presentation the next day. Despite Ms.
21 Stonelake explicitly saying "no" and "stop" as MF attempted to force his tongue into her
22 mouth, he pushed her onto the bed and put his hands down her pants, under her jeans
23 and underwear. Ms. Stonelake remembers pushing him off of her and MF stumbling
24 around her room at which point she must have passed out. She awoke to find MF fully
25 clothed and sleeping on her bed, snoring loudly. She was also fully clothed. She
26 screamed at him to leave and immediately called her husband.

1 19. Later that summer, on another business trip, in the basement bar of the W
2 Union Square in New York City, NY, he told her she wouldn't be promoted unless she
3 had sex with him. He bragged of his ongoing sexual relationships with young women
4 when he worked at Snapple and CNN, referring to the behavior as the "fast track" for
5 attractive women. Ms. Stonelake declined this offer and was not promoted.

6 20. MF continued harassing Ms. Stonelake and she told him that she would
7 report him to HR if he didn't switch teams.

8 21. MF then pursued and landed an open leadership role in another marketing
9 organization at Facebook, but the harassment continued and intensified, with male
10 members of the partnering sales team frequently making jokes suggesting that they
11 believed she'd had a consensual sexual relationship with MF, or taunting her for being
12 out of MF's league. When MF saw Ms. Stonelake on campus or at company events,
13 he'd engage in escalating patterns of communication including winks across the room,
14 messages through internal communication channels, approaching Ms. Stonelake when
15 she was speaking with mutual colleagues, or approaching Ms. Stonelake when she
16 was alone.

17 22. Ms. Stonelake felt she had no choice but to seek to relocate to escape
18 him.

19 23. She proposed to Facebook a move of her role to Seattle and moved in
20 December 2012.

21 24. Ms. Stonelake eventually reported MF's harassment to multiple managers
22 and colleagues.

23 25. No action was taken and MF remained at the company for several more
24 years, with no consequences.

1 **C. Ms. Stonelake shined in her role and quickly advanced, insulated**
2 **somewhat from the ongoing sexism at Facebook by a strong mentor and**
3 **boss**

4 26. Meanwhile, Ms. Stonelake, who was a founding member of the team that
5 became the Creative Shop, shined in her role.

6 27. Between 2012 to 2017, Ms. Stonelake rose from IC4 to Director. She
7 became a patent holder, traveled the globe consulting Fortune 500 CMOs on their
8 biggest business challenges, and was an advertising luminary, serving as a judge for
9 creative work around the world.

10 28. Her ratings throughout that time were Exceeded Expectations (five times),
11 Greatly Exceeded Expectations (four times), and Redefines Expectations (twice).

12 29. For most of this time, she reported to TB, a leader who was an invaluable
13 mentor, one of the strongest allies of her career.

14 **D. In 2016, Ms. Stonelake began facing harassment and discrimination**
15 **from her new manager and male colleagues.**

16 30. In 2016, she began reporting to "ES." From the outset, ES was overtly
17 hostile to Ms. Stonelake based on her sex. He constantly undermined and belittled her,
18 regularly made sexist and offensive comments, overtly and tacitly condoned similar
19 comments by his male reports, and held her to higher standards than her male
20 counterparts.

21 31. On one occasion at a company-wide business conference in San
22 Francisco, ES had been drinking and, with his arm around Ms. Stonelake, asked, "How
23 can I better support you?" Ms. Stonelake requested more genuine constructive
24 feedback for growth. ES told Ms. Stonelake, "let me tell you about a woman I worked
25 with at Leo Burnett who was the smartest, hardest working person at the agency, but
26 she was old, and a mom, and no one liked her because every time she opened her
27 mouth she was right and no one wants to work with a woman who is always right."

1 32. Ms Stonelake complained about this comment to peers and managers, but
2 nothing happened.

3 33. When she confronted ES herself about the inappropriateness of the
4 comment, he responded that he had told this story to other women (including “NL,” who
5 had recently left) on the team and “they were all grateful, so why aren’t you?”

6 34. During an offsite for ES’s leadership team in Toronto, he hosted a “speed
7 dating” style feedback round. Ms. Stonelake’s male peer, “TG,” used the opportunity to
8 tell her that it’s not fair to others in the group that she is smart. He told her that to be
9 better liked and have better relationships she needs to act less smart.

10 35. Ms. Stonelake went to ES for support, but he thought it was funny. She
11 also reported this to LB, her HR Business Partner, who said she would talk to ES about
12 it. Nothing ever happened.

13 36. ES also subjected Ms. Stonelake to different standards than her male
14 counterparts in the evaluation and promotion process.

15 37. He made her write her own directorship promotion case and portfolio – a
16 robust process which is supposed to be the manager’s responsibility to compile - but
17 did not make her male colleague, TG, write his.

18 38. He also told Ms. Stonelake that TG needed to “land the plane” to get
19 promoted, but for her to be promoted, she both needed to “lap [TG] *and* land the plane
20 first.” TG and Ms. Stonelake were not competing for a single seat.

21 39. She pushed back against this obvious double standard and was met with
22 hostility.

23 40. In the summer of 2017, she attended the Cannes Festival for Creativity,
24 representing the company and her team’s work. Ms. Stonelake’s work was shortlisted
25 and Sheryl Sandberg and Johnathan Mildenhall celebrated her by name from stage.
26 Later, at a party with a group of colleagues, a male executive in her management chain

1 said drunkedly, "Hey Kelly, what would your husband say if you called him right now
2 and said that you fucked me?"

3 **E. Sexism forced Ms. Stonelake to turn down a valuable promotion in**
4 **2017**

5 41. Later in 2017, Ms. Stonelake was invited to interview for a job in
6 Singapore to lead Creative Shop in APAC (Asia Pacific - Asia, Australia, and New
7 Zealand). The role would act as a peer to ES (who led Creative Shop in North
8 America). It would have been a significant increase in scope, and was scoped as a D2
9 role.

10 42. During the interviews for the role, which Ms. Stonelake was later offered,
11 she asked the sales leader in APAC, "DN," if he believed a woman could succeed in
12 this role due to the open sexism and disregard for women she experienced on a recent
13 business trip.

14 43. Namely, when traveling to Tokyo in fall of 2016, she was repeatedly interrupted
15 by senior male clients from Amazon who were visiting from India who initially greeted
16 Ms. Stonelake by looking her up and down and saying, "who put this one in charge?".
17 During the meeting, Ms. Stonelake was finally forced to ask them not to interrupt her, at
18 which point they began screaming and cursing at her. At the end of the meeting, two of
19 the men asked for her phone number and promised to show her a good time around
20 Tokyo. After the meeting, teams expressed care and concern, but did not suggest that
21 they would step in or that anything would be done. Instead, they explained to Ms.
22 Stonelake that this is "just how it is" for women in Asia.

23 44. In response to the question of whether or not a woman could succeed in
24 the role, DN's response was "at least you're not Chinese."

25 45. Ms. Stonelake, who had been so excited about the opportunity that she
26 had already put her kids on waitlists at International Schools in Singapore, was forced
to decline the advancement opportunity.

1 **F. By 2020, working under ES became untenable.**

2 46. In January of 2020, Ms. Stonelake led a meeting at the Consumer
3 Electronics Show in Las Vegas with the CMO of Samsung. In this meeting, ES fell
4 asleep and Ms. Stonelake was required to have multiple clearing conversations with
5 internal partners. Later, he took credit for the results of the meeting.

6 47. In summer 2020, during nationwide protests following George Floyd's
7 murder, ES changed his profile picture to a "Blue Lives Matter" image. Understanding
8 this as a deliberate counter-movement to Black Lives Matter, and concerned about its
9 impact on the diverse team they were leading, Ms. Stonelake initiated a conversation
10 with ES about the implications of his action. His response was immediately hostile and
11 retaliatory.

12 48. As women often have to in a corporate setting, Ms. Stonelake tiptoed
13 around his ego while also ensuring the message was clear, "I'm not sure if you know
14 but the logo in your post is a blue lives matter flag.... Blue lives matters is considered a
15 counter movement to BLM..." ES' initial response was, "I understand it."

16 49. Later, when speaking in person, ES defended himself by saying "black
17 boys start out innocent and between then and when they got shot by police, they're
18 getting into gangs and getting into crime, and the real issues are with social services
19 and education."

20 50. Ms. Stonelake continued to try and engage in constructive dialogue with
21 ES. He was uninterested and openly hostile to the conversation. He called Ms.
22 Stonelake and another senior woman who had joined the call for accountability "a pen
23 of pitbulls," "blood letters," and the "vipers den."

24 51. In June 2020, Ms. Stonelake, along with others, emailed HR expressing
25 concern about this series of events including the way ES was responding to them.

26 52. On June 30, Ms. Stonelake met with Meta's investigations team and
provided screenshots and documentation of the exchange between her and ES. After

1 her report to HR, Ms. Stonelake had a performance review with ES on August 6. He
2 was seething with anger. He told her she had “run her mouth” and wasn’t “likable.”
3 There were no formal performance ratings issued that half due to COVID, but even
4 despite Ms. Stonelake’s glowing upward and peer feedback and outstanding business
5 performance, ES stated that if he had rated her he would have given her a “meets
6 some” rating. He told her this is a consequence of her own actions and she should
7 think twice next time. This threat was particularly egregious given Ms. Stonelake's and
8 her team’s outstanding performance, including internal Pulse employee satisfaction
9 scores of 95% and strong feedback.

10 53. She reported this to HR but received no support.

11 54. The hostile work environment continued and on August 12, Ms. Stonelake
12 took a month of COVID leave that the company offered employees as a benefit. She
13 emailed her HR Business Partners LB and JM on September 12 before returning from
14 leave, expressing her anxiety about the retaliation, and requesting the accommodation
15 of a joint conversation between HR, Ms. Stonelake, and ES to clear the air, and not
16 being required to meet 1:1 with ES until then. Her requests were denied.

17 **G. Ms. Stonelake transferred to Facebook Platform, hoping for a fresh**
18 **start, and with promises of a promotion path to D2**

19 55. Around the same time, Facebook executive Brian Boland contacted Ms.
20 Stonelake to recruit her for an opportunity in his organization. She would be reporting
21 to Brett Vogel leading important Platform and third-party data work in a strategic
22 business function: product marketing management (PMM) for Developer Platform, the
23 team she’d joined at Facebook originally.

24 56. In a September 12 email to Human Resources, Ms. Stonelake informed
25 HR that she’d completed interviews for the PMM role while she’d been on leave. In the
26 email she said, “I love Creative Shop but can’t keep working with [ES]... As it stands

1 right now, I'm dreading coming back because of potential continued retaliatory
2 behavior." Still, no actions were taken.

3 57. In light of the continued unfair treatment by ES and HR's refusal to take
4 steps to protect her or resolve the issues, Ms. Stonelake left the team she had spent a
5 decade building and switched to an entirely new function as the PMM Director for
6 Developer Platform.

7 58. Her decision to make this particular leap was influenced heavily by
8 conversations with Mr. Boland and Mr. Vogel about this new role supporting a D2
9 scope. In her first full performance cycle as a PMM Director, Ms. Stonelake earned a
10 rating of Greatly Exceeds Expectations, which is reserved for the top 10% of the
11 company, and Mr. Vogel wrote, "Last half, you delivered impact through your significant
12 contributions to the effectiveness of the Developer Platform org and leadership team,
13 your contribution to product strategy, and your people management. Throughout, you
14 brought an uncommon passion and commitment to delivering great outcomes for the
15 developer audience you serve."

16 59. Ms. Stonelake's performance review goes on to highlight areas of
17 individual impact, including playing a leading role in the development and execution of
18 f8 (Facebook's Marquee Developer event), and serving as Partnerships' "single
19 threaded owner for iOS14," where Ms. Stonelake performed a company-wide risk
20 assessment of the impact on Apple's changes to Meta's business, a project requiring
21 immense skill, judgment, and discretion.

22 60. Ms. Stonelake was also recognized for her ability to work cross-
23 functionally with product and engineering leadership teams, where PMM was
24 embedded. Mr. Vogel states, "You established yourself as a strong member of the
25 Developer Platform leadership team and used it as an effective channel for increasing
26 rigor, bringing a developer-first mindset, and improving the health of the XFN. In the

1 words of the Partnerships VP: 'Kelly is simply amazing!!! Her joining the team brought
2 fresh perspective but more importantly care and passion for our platform and the
3 audiences investing in them!'"

4 61. This August 2021 review also recognizes additional contributions such as,
5 "You organized and launched the Women of Developer Platform group,' and "You build
6 a culture where differences are appreciated and valued." Mr. Vogel also quoted a peer
7 review that said, ""Kelly is also a relentlessly strong ally and confidant for women and
8 underrepresented communities across Developer Platform. She isn't afraid to call out
9 bias when she sees it -- something I've never seen another leader do and which has
10 incredible consequences on changing behavior and helping people identify and root out
11 implicit bias."

12 62. Despite performing significantly above her expectations in a brand new
13 role, after not receiving an earned promotion, and after being told the role she
14 interviewed for supported a D2 scope, Ms. Stonelake was not promoted.

15 **H. At Platform, Ms. Stonelake insulated Meta from \$10 billion in fines**
16 **for non-compliance in the wake of the Cambridge Analytica crisis, but was**
17 **not promoted like the men on her team.**

18 63. In 2019, Meta became subject to an FTC consent order due to repeated
19 violations of consumer privacy rights, deceptive business practices, and its failure to
20 comply with a prior 2012 FTC settlement. The enforcement action was driven by Meta's
21 systemic misrepresentation of user data privacy, including its failure to restrict third-
22 party access to personal information, most notably in the Cambridge Analytica scandal.
23 Despite publicly assuring users that they controlled their data, Meta allowed external
24 developers to harvest and misuse personal information without proper oversight.

25 64. These practices not only breached consumer trust but also violated
26 federal law and the company's existing obligations under the FTC's prior consent
decree.

1 65. To address these ongoing violations, the 2019 FTC consent order
2 imposed a \$5 billion non-compliance penalty and mandated a comprehensive,
3 independent privacy compliance framework, including a Data Protection Assessment
4 (DPA) requirement. This DPA, overseen by third-party auditors (Palantir), was
5 designed to ensure that Meta systematically evaluates and mitigates privacy risks
6 associated with its data collection, sharing, and retention practices. By requiring Meta
7 to assess and document the effectiveness of its privacy controls, the FTC sought to
8 enforce long-term structural reforms and prevent further deceptive practices.

9 66. The first round of DPA (DPA 1.0) launched in 2021 and was initially a
10 catastrophe. It resulted in significant business interruption for hundreds of strategic
11 partnership & advertising partners.

12 67. Ms. Stonelake and her team were not responsible for DPA 1.0, its roll-out,
13 or the resulting crisis, but as soon as the crisis for Meta, partners, and users became
14 clear, she took a leading role in the DPA 1.0 War Room in an effort to resolve the
15 business impact.

16 68. Her effort began with round-the-clock, continuous work for the first 96
17 hours of the fire drill – and the effort continued for months. She did not sleep when
18 thousands of Meta’s partners were taking to the forums to understand why their app
19 was disabled, and the ops team had no active forum managers – so she got into the
20 forums personally – acknowledging the issue, directing partners to resources, resolving
21 false positives, and more to ensure Meta was appropriately supporting its partners and
22 maintaining community trust.

23 69. Where other executives created spreadsheets tracking the number of
24 impacted Developers, Ms. Stonelake helped the Developers.

1 70. During this crucial period, she and her team preserved millions in sales
2 revenue, and resolved issues that were preventing thousands of apps from coming into
3 compliance.

4 71. She then led a cross-company effort to address the DPA 1.0 breakpoints
5 in order to launch a successful DPA 2.0 (2022).

6 72. BV captured much of this in Ms. Stonelake's H2 2021 Downward Review:

7 “You played a leading role in the Day 545 War Room, a critical
8 company/FTC-level effort...you quickly broke down the issue and
9 ensured these business apps were not impacted...you personally
10 provided first-line support to a huge number of developers... engaging
11 directly with them to address their questions and help them find
12 resolution...this was selfless, scrappy work that had a material positive
13 impact on our partners and set an important example for internal
14 teams...you developed a creative workaround to a SEV that was
15 preventing GCR-based developers from communicating with us and
16 coming into compliance... engaged deeply with senior market-facing
17 leaders from across MBG, ensuring they were appropriately supported
18 and enabled...As a result of the War Room and your significant efforts,
19 partners and internal teams were massively better enabled, false
20 enforcements were significantly reduced, and nearly all of our key
21 partners were brought into compliance.”

22 73. Ms. Stonelake expected to be promoted in Q1 2022 after this exceedingly
23 hard work, exceptional results, and positive performance feedback. This promotion
24 was something she and Mr. Vogel discussed multiple times. And especially after her
25 work leading the war room, and after the previous performance cycle, she saw a
26 promotion as a certainty.

 74. But she was not promoted, even though because of her team's
exceptional performance, the men all around her – including 20% of her team, and Mr.
Vogel himself – were promoted.

 75. Mr. Vogel, now a Vice President, told her that to get promoted, in addition
to all of her core job scope, she not only needed to prove she could fix the DPA
problem the first time (which she had not created, and was not in her scope), she must

1 also prove she could improve it the next time. He also explained that the DPA 1.0
2 rollout was a bad look, and when these things happen, “someone has to take the fall,”
3 and that “it’s really hard to promote someone at this level who was so close to so many
4 things going wrong.”

5 76. Ms. Stonelake was crushed. The person who should have taken the fall
6 would be the male VP, “BM,” who had put DPA 1.0 in the hands of a senior IC, “KC,”
7 who was under-resourced. Ms. Stonelake respected and liked BM and wished him no
8 ill-will, and at the same time did not want to take a pay cut for him.

9 77. She was also hurt and confused. She had a great deal of respect and
10 professional admiration for Mr. Vogel and could not understand the gap between the
11 picture he painted with his words, and the reality they both experienced.

12 78. Like ES had told her – in order for her to be promoted as a woman at
13 Meta, she needed to “lap the man *and* land the plane first.” And then she *still* might be
14 the scapegoat.

15 **I. Ms. Stonelake put her head down, led DPA 2.0 to a landslide**
16 **success, but was passed over for promotion yet again**

17 79. In spite of this huge setback, Ms. Stonelake focused on doing the next
18 right thing. She did not want accountability without control and advocated to assume
19 ownership for DPA 2.0. She started by building out a team to lead this work.

20 80. She proposed “LY” should be her right-hand man in the rebuilding effort.
21 LY was an M1 who had just been re-orged into her team, and had no direct Meta PMM
22 experience but had worked in PMM adjacent roles. In his previous Meta role, she had
23 worked directly with LY and he had been a consistently stand out partner who she
24 trusted deeply to do the right thing. She was encouraged to hire a senior M2 or a
25 Director, but Ms. Stonelake believed LY to have great potential and be underutilized,
26 and knew he had what it took to solve this. Ms. Stonelake encountered a lot of push
back at the idea of staffing a team for work of this magnitude under an M1. After being

1 told no multiple times, Ms. Stonelake met with Mr. Vogel and BM to discuss. Mr. Vogel
2 and BM asked if she'd bet her own career on LY, given that she was effectively doing
3 so when she could otherwise hire a strong M2 or Director for this role. Both men
4 encouraged Kelly to consider a more senior person from an optics standpoint,
5 suggesting it would be better for her and her growing team if she brought in a more
6 senior person. LY was an Asian American man, and Ms. Stonelake believed
7 unconscious bias was impacting the push back. Ms. Stonelake agreed to bet her career
8 so that LY could have an opportunity he deserved but would otherwise not receive. LY
9 did so well that he was promoted. Ms. Stonelake, again, was not.

10 81. By February, Ms. Stonelake had organized a Virtual Team of leaders
11 across 23 functions to work together toward the multi-year north star goals for the
12 project.

13 82. DPA 2.0 was a landslide success; it launched on time and resulted in 96%
14 on-time submission rates (+56% year over year), no unexpected adverse revenue
15 impact to Meta, and zero high-visibility partner escalations (versus hundreds in 2021).
16 There were no PMM or PM team departures due to burnout (versus 100% of the DPA
17 1.0 core team in 2021). It was a home run.

18 83. LY was promoted for the work he did on this project - a case that was
19 supported by Ms. Stonelake, Mr. Vogel, and Ms. Stonelake's entire upline. From
20 September 2021 through December 2022, Ms. Stonelake had played a leading role in
21 insulating Meta from \$10 billion in FTC Consent Order non-compliance fines. She had
22 done what Mr. Vogel demanded and then some. She had lapped the men and still
23 landed the plane.

24 84. But they were promoted and she was not.
25
26

1 85. Indeed, over the course of this project, Ms. Stonelake’s male boss (Vogel),
2 male report (LY), all of his eligible reports, and male peer (CS) most deeply involved
3 with the project were promoted.

4 **J. She was not. Ms. Stonelake was simultaneously supporting the**
5 **Horizon PMM team, and began blowing the whistle about danger to**
6 **children on the new platform**

7 86. While all this was happening, in early 2022, Mr. Vogel accepted a new role
8 as the PMM Director for the Metaverse organization within Reality Labs. When he
9 moved, he took Ms. Stonelake and her team with him.

10 87. Ms. Stonelake had been asked to take on additional scope and also lead
11 the 20-person Horizon PMM team while their Director, Meaghan Fitzgerald, was on a 7-
12 month long maternity leave. Ms. Stonelake approached the new opportunity with vigor
13 and excitement as it was one of the most strategically critical initiatives at the company
14 in the wake of Apple’s iOS14 significantly disrupting Meta’s advertising business.

15 88. Horizon is Meta’s virtual-reality operating system that is the social
16 operating system for Oculus headsets.¹

17 89. Horizon had been initially released on Oculus, and Ms. Stonelake’s job
18 was to continue her role overseeing Developer Platform PMM while also leading
19 Horizon through three major expansions: to teens, mobile, and internationally.

20 90. At Meta, each product is operated like a 3-legged stool, one leg being
21 Engineering, the other Product Management, and the third Product Marketing (PMM),
22 which represents and supports all of the inbound (e.g. research, strategy) functions and
23 outbound (e.g. marketing, events, PR) non-technical functions related to informing
24 product development and taking that product to market.

25 91. Upon assuming leadership of the Horizon PMM team, Ms. Stonelake
26 initiated a comprehensive "listening tour," meeting with all team members, their direct

¹ [Meta Horizon OS - Wikipedia.](#)

1 reports, cross-functional partners, and key stakeholders. This systematic review
2 revealed deeply troubling patterns of dysfunction, discrimination, and safety concerns:

3 92. The dysfunction and discrimination included that:

4 a. Employees reported widespread fear and anxiety throughout the
5 organization.

6 93. Jeff Lin, who led product design, routinely yelled and belittled employees
7 for pushing back on him or other senior male leaders, with women being targeted.

8 a. Women's work was summarily dismissed by male leadership regardless of
9 quality or strategic importance, often being asked to prepare lengthy
10 reviews and then being brushed aside when the meeting came.

11 b. Female employees reported feeling their voices were considered less
12 valuable and that differential treatment was openly permitted

13 94. The safety issues included rampant hate speech and bullying on the
14 platform, and inadequate parental controls, in violation of Meta's regulatory
15 requirements. This meant that the many children who were already easily able to
16 access the platform (even though it was marketed as 18+) were being subject to hate
17 speech, sexual harassment, and bullying, often within minutes of beginning to play.

18 95. Ms. Stonelake's listening tour revealed feedback and concerns that users
19 who created black avatars in Horizon were subjected to immediate and severe racist
20 abuse: the leadership team was aware that in one test, it took an average of 34
21 seconds of entering the platform before users with black avatars were called racial
22 slurs including the "N-word" and "monkey." This abuse was widespread and consistent,
23 indicating a systemic pattern rather than isolated incidents. The harassment often
24 began before users could even orient themselves to the virtual environment and the
25 platform lacked basic mechanisms to prevent or address racist harassment.²
26

² These issues were later corroborated by researchers ([Metaverse report May 2022.pdf](#)).

1 96. Ms. Stonelake learned that safety features required by regulations were
2 missing, privacy reviews were regularly held where executives called into question
3 whether or not laws were mandatory, and tools for monitoring and moderating abusive
4 behavior were inadequate.

5 97. The female marketing director, "KA," who was not on the product
6 leadership team, had been advocating for a launch pause, but had been dismissed
7 repeatedly by Vivek Sharma, Vishal Shah, and Jeff Lin, and the all-male Horizon
8 product leadership team.

9 98. KA, a talented and seasoned leader in her field, told Ms. Stonelake that
10 she did not feel like she could build a marketing plan in good faith, as she would be
11 sending people to a product that did not meet the promises in the advertising, including
12 parental and safety controls. She and her team were concerned about PR and legal
13 blowback of launching and marketing a product that was failing usability tests on a daily
14 basis. KA also told Ms. Stonelake that meeting with Jeff Lin was a source of distress for
15 the junior women on her team, who often reported being treated with contempt by Mr.
16 Lin.

17 99. Despite these concerns, Meta's leadership was aggressively pushing to:
18 roll out Horizon to teenagers without adequate parental controls, launch on mobile
19 platforms without adequate product quality, and expand into markets where the product
20 did not meet local regulatory requirements.

21 **K. Ms. Stonelake was boxed out of leadership meetings after blowing**
22 **the whistle about Horizon safety issues**

23 100. Ms. Stonelake took over the mantle inside the Horizon product leadership
24 meetings, and began vocally advocating for the need to pause the ship dates for teens,
25 mobile, and international.
26

1 101. The male product leadership team, especially Jeff Lin, made fun of Ms.
2 Stonelake and KA's concerns, even though the concerns proved to be incredibly valid,
3 and it was core to Ms. Stonelake and KA's job expectations to surface these issues.

4 102. When Ms. Stonelake raised KA's concerns in a leadership meeting where
5 she was the only woman present, saying "we need to discuss the concerns [KA] has
6 been raising," Mr. Lin's immediate response was to say, "how fast can you shut her
7 up?" He then laughed and said, "that's your job, now let's see if you're as good as they
8 say you are."

9 103. Ms. Stonelake did not do so. And after she kept raising the issues in the
10 leadership team meetings, Ms. Stonelake noticed the weekly Horizon Leadership
11 Meetings soon disappeared from her calendar.

12 104. When Ms. Stonelake, who considered this could have been the result of
13 an honest mistake, consulted with Vivek Sharma and Vishal Shah' admin team to
14 reinstate the meeting, she was informed that Sharma and Shah had instituted a "no
15 interim leader," policy. Ms. Stonelake scheduled live meetings to follow up, where it
16 was explained that given how sensitive the matters discussed were, they were going to
17 keep the room small.

18 105. When Ms. Stonelake surfaced this with Human Resources, including
19 noting that she was the only female member of the leadership team, and that her job
20 required her to drive influence in this room, HRBP SM explained that Sharma and Shah
21 have autonomy over their leadership teams and felt a smaller room would be more
22 secure. This explanation did not hold up. Ms. Stonelake was overseeing some of the
23 most confidential work at the company, she was the only "interim leader," and at the
24 time, the only female member of the leadership team.

1 106. Mr. Shah maintained this position even after Mr. Sharma left the company
2 and Mr. Shah himself began regularly joining the leadership meetings in an interim
3 capacity in Mr. Sharma's absence.

4 107. Ms. Stonelake was determined to continue raising these important issues,
5 which were not only a responsibility of her role but also a moral responsibility given the
6 safety and public policy concerns at issue. Ms. Stonelake loved the company and did
7 not want to see Meta get into trouble or cause harm.

8 108. When initially barred from the leadership room, Ms. Stonelake's manager,
9 Mr. Vogel, had been out of the office on a month-long sabbatical. Upon his return she
10 asked for his support getting her back in the leadership room. He said that since they
11 were new to the org, he didn't want to deal with the politics of that and best to just let
12 him keep her looped in of important things.

13 109. After Ms. Stonelake was excluded for advocating a quality pause, Shah
14 implemented the exact same pause, rebranded it a "quality lockdown," and received
15 credit for the initiative. He positioned it to be mostly about product quality, downplaying
16 the safety issues.

17 110. Ms. Stonelake focused on doing the next right thing for the company, its
18 partners, and users – she aligned her team and resources in support of "Mr. Shah's"
19 Quality Lockdown.

20 **L. Ms. Stonelake warned executives about potential FTC liability from**
21 **the redirection of crucial DPA resources to the Horizon launch, but she was**
22 **shut down.**

23 111. During this period, Ms. Stonelake discovered that product leaders were
24 attempting to redirect resources from Developer Platform's privacy and compliance
25 team to accelerate Horizon's development. Specifically, they planned to reallocate
26 members of the engineering and product teams responsible for executing Data
Protection Assessment (DPA) and other privacy requirements to an organization

1 working on Horizon’s infrastructure and stability issues. Ms. Stonelake wrote emails
2 alerting executives to the risks and spoke up in multiple meetings warning this would
3 risk \$5 billion in FTC fines, put partners’ business in jeopardy, and breach user trust.
4 Despite the gravity of her warning, she was told she had "done her part" by raising
5 concerns and should "move on to things within [her] control."

6 **M. Ms. Stonelake was asked to serve as a “bias interrupter” and then**
7 **chastised for calling out bias and unequal standards**

8 112. Also in January 2023, Yvonne Cantrowitz (HRBP) and Mr. Vogel asked
9 Ms. Stonelake if she would serve as Metaverse PMM’s “Bias Interrupter” in the H2
10 2022 calibrations (mid-January). As Ms. Cantrowitz described, “the role of Bias
11 Interrupter includes asking difficult questions, probing to better understand the rationale
12 for proposed decisions, ensuring decisions are being made based on objective
13 evidence and behaviors, and providing those in the room an opportunity to speak.”

14 113. Ms. Cantrowitz told Ms. Stonelake and the entire Metaverse PMM team
15 that she was selected because she has a history of exhibiting these behaviors even
16 without a formal expectation.

17 114. Ms. Cantrowitz was correct. Ms. Stonelake used her political capital at
18 Meta to advocate for women and underrepresented minorities who were routinely
19 overlooked in performance calibrations and promotion cycles. She had actively pushed
20 back on biased narratives that downplayed their contributions, advocated for their
21 promotions in calibration discussions, and challenged decisions that would have
22 otherwise perpetuated the existing inequities for many under-leveled or under-
23 recognized, underrepresented colleagues including LW, JL, RW, AT, SB, TS, CS, PH,
24 LY, NTB, JL, ED, CC, CL, KH, LS, and many more.

25 115. This advocacy was not without professional risk: as Ms. Stonelake had
26 learned, women in leadership who speak out against bias often face retaliation,
marginalization, or are penalized for being perceived as “difficult.” Despite these risks,

1 Ms. Stonelake remained committed to advancing equity within Meta, even as her own
2 career was hindered by the very same biases she worked to combat.

3 116. It soon became apparent that this bias interrupter role and its pre-
4 meetings, emails, and trainings were meant to distract her and perhaps direct her
5 change-agent attention, and that she was not welcome to actually call out bias.

6 117. Three of Ms. Stonelake's male peers came to the calibrations completely
7 unprepared, with no familiarity with the expectation grid or standards, and assigned
8 their male direct reports unprincipled superlative ratings with no basis in the established
9 expectation grid, such as "he's just a superstar," "he deserves to be recognized for all
10 that effort," "he's just a great guy!" When asked to ground their ratings in the
11 expectation grid, they said they'd been too busy to consider it.

12 118. These peers also claimed to be unfamiliar with the expectations grid for
13 their organization, despite having been responsible to submit the performance reviews
14 for their downlines based on that grid. Ms. Stonelake surfaced this issue and was told
15 by Mrs. Cantrowitz to "not dwell there."

16 119. When Ms. Stonelake put forward a member of her team, PH, who was an
17 Asian man and an immigrant, for promotion, based on his performance two levels
18 above his comp band, Mr. Hutto said he agreed PH had an impressive year but that PH
19 seemed "hungry" enough to keep hustling, and asked if Ms. Stonelake thought PH
20 would keep working hard without the promotion.

21 120. This did not deter Ms. Stonelake, but it did scare her. Ms. Stonelake
22 offered to meet with Mr. Hutto and his two teammates after the first day of calibrations,
23 in the interest of fairness for their reports and everyone else. Mr. Hutto accepted her
24 offer but once they were on the phone, he asked Ms. Stonelake if she would complete
25 the write-ups for his reports, which was a core expectation of Mr. Hutto's role. She
26 declined.

1 121. The next day, two of the three peers showed up unprepared again, so
2 again Ms. Stonelake “called out bias.” She was met with an eye-roll from Ms.
3 Cantrowitz. Ms. Cantrowitz rudely told Ms. Stonelake to stop, that there “wasn’t
4 enough time” to have the discussion, and that her concerns would be handled offline.

5 122. Ms. Stonelake became upset and explained that she would not have
6 agreed to be a bias interrupter if she was going to experience invalidation herself that
7 merely perpetuated the bias. Ms. Stonelake uncharacteristically broke into frustrated
8 tears and left the call a few minutes early.

9 123. Mr. Vogel called her immediately and offered to fly from San Francisco to
10 Seattle to take her to dinner that evening. At that dinner he said, “you haven’t seemed
11 like yourself lately.”

12 124. Ms. Stonelake hadn’t felt like herself; her health was rapidly deteriorating.

13 125. At this dinner, Mr. Vogel told Ms. Stonelake that heading into calibrations,
14 he would not be putting her forward for a promotion, so again she would not receive her
15 well-earned promotion, despite her exceptional performance leading what had a few
16 months prior been the full scope of two D1s.

17 126. Mr. Vogel explained that documenting Ms. Stonelake's accomplishments
18 would expose the failures of male leaders whose support she needed for promotion,
19 most importantly Mr. Shah. The boss of these male leaders, CTO Andrew Bosworth,
20 would be in the room when her promotion case was discussed, creating what Mr. Vogel
21 considered an impossible situation. He told her that "this is how it works" at senior
22 levels, and that while it "didn't make sense," she would need to accept it. He promised
23 to "make it right" in the future if she continued performing at her current level. He
24 reassured her that he didn't think it would be difficult. At this dinner, Mr. Vogel
25 apologized for not doing more to support her access to the leadership room she had
26 been excluded from, and that he regretted it.

1 **N. Ms. Stonelake took emergency mental health leave soon after, and**
2 **was ultimately laid off due to extended medical leave**

3 127. As she encountered obstacle after obstacle in her final years at Meta, Ms.
4 Stonelake's cognitive dissonance between the company that she thought Meta was
5 and the decisions that were actually being made, had been growing stronger by the
6 day.

7 128. Between hitting the glass ceiling hard, experiencing chronic invalidation of
8 her skills and accomplishments, sexism, and double standards, all against a backdrop
9 of two years spent devoting grueling long hours completely to Meta's best interest, Ms.
10 Stonelake's mental health struggles flared and became something unrecognizable.

11 129. In February 2023, she went on emergency mental health leave to cope
12 with the severe effects of her treatment at Meta. She was in intensive outpatient
13 treatment for many months due to acute suicidality and PTSD, including a year spent
14 completing Dialectical Behavioral Therapy including the Prolonged Exposure ("DBT-
15 PE") methodology of addressing PTSD, and a full treatment course of Transcranial
16 Magnetic Stimulation.

17 130. During her medical leave, Ms. Stonelake's role was eliminated and she
18 was offered an individual contributor role, the Builder Role that she and Mr. Vogel had
19 designed, which she accepted.

20 131. But ultimately, the impact on Ms. Stonelake's mental health from Meta's
21 culture and treatment was too severe and she was unable to return to work before the
22 Builder Role was eliminated.

23 132. Ms. Stonelake was laid off from Meta, effective January 8, 2024.

24 133. Her career trajectory has been permanently damaged and she continues
25 to engage in weekly individual therapy, group therapy, and occupational therapy to
26 regain executive function skills that were lost after the damage she incurred at Meta.

1 134. Stonelake’s severe mental health decline, initially understood as PTSD
2 and major depressive disorder, was ultimately revealed to also be the result of autistic
3 burnout—a neurological crisis unique to autistic individuals that occurs after prolonged
4 exposure to chronic stress, forced masking, and ethical or cognitive dissonance in
5 environments that fail to accommodate autistic needs. Autistic burnout is not simply
6 exhaustion or stress; it is a profound and systemic shutdown that impairs cognitive
7 function, executive ability, and emotional regulation, often leading to severe depression
8 and suicidality.

9 135. For Ms. Stonelake, this burnout was exacerbated by the persistent ethical
10 conflicts she was subjected to at Meta, where she was pressured to participate in
11 decisions that directly contradicted her moral framework. Autistic individuals often have
12 an exceptionally rigid sense of justice and an intense need for ethical consistency. The
13 cognitive dissonance between Meta’s public commitments to safety and integrity and
14 the reality of deprioritizing user protections created a distressing and destabilizing
15 conflict. Unlike neurotypical colleagues, who may have been able to compartmentalize
16 these contradictions, Ms. Stonelake’s autistic neurology made such dissonance
17 untenable, leading to an overwhelming and inescapable state of mental distress. When
18 Meta disregarded her attempts to raise critical safety concerns, she was not only
19 professionally sidelined but neurologically harmed.

20 **O. Ms. Stonelake is one among multiple female Meta executives forced**
21 **to take medical leave.**

22 136. Ms. Stonelake witnessed and documented a pattern of systemic
23 discrimination that resulted in the systematic removal of women from leadership roles.

24 137. Of the approximately 20 PMM directors and VPs in Reality Labs
25 (Metaverse, Horizon, Meta RayBans, Oculus) in role as of November 2022, only four
26 were women. By the time Ms. Stonelake went on medical leave in January 2023, she

1 was the third of these four women to leave the organization on an emergency medical
2 leave.

3 138. None of the women who left returned to Meta.

4 139. The exodus of female leaders was directly tied to Meta's hostile response
5 to women who raised concerns about product decisions. Both JP and AB, two of the
6 female leaders who left, had been mistreated after pushing back on critical product
7 decisions. This created a clear pattern: women who exercised their professional
8 judgment to protect Meta's interests were systematically pushed out if their
9 assessments challenged male leaders' preferred course of action.

10 **IV. CLAIMS**

11 **Sex harassment under the Washington Law Against Discrimination, RCW 12 49.60**

13 140. Plaintiff realleges and incorporates by reference as if fully set forth herein,
14 each and every allegation in the preceding paragraphs.

15 141. Defendant's employees, managers, and leaders subjected Ms. Stonelake
16 to a pattern of sex harassment throughout her employment that was offensive and
17 pervasive.

18 142. Management either participated in the conduct or knew about the conduct
19 and failed to take prompt and adequate corrective action.

20 143. As a proximate result of Defendant's unlawful actions, Ms. Stonelake lost
21 wages, RSUs, and benefits and suffered emotional harm.

22 **Sex discrimination under the Washington Law Against Discrimination, 23 RCW 49.60**

24 144. Plaintiff realleges and incorporates by reference as if fully set forth herein,
25 each and every allegation in the preceding paragraphs.

26 145. Defendant discriminated against Ms. Stonelake in the terms and
conditions of her employment because of her sex.

1 146. Defendant treated Ms. Stonelake differently than her male peers in the
2 material terms of her employment, and in failing to promote her in 2022 and 2023.

3 147. As a proximate result of Defendant's unlawful actions, Ms. Stonelake lost
4 wages and benefits and suffered emotional harm.

5 **Retaliation under the Washington Law Against Discrimination,**
6 **RCW 49.60**

7 148. Plaintiff realleges and incorporates by reference as if fully set forth herein,
8 each and every allegation in the preceding paragraphs.

9 149. As alleged above, Plaintiff repeatedly raised complaints about bias and
10 discrimination at Meta. Defendant retaliated against her for opposing discrimination in
11 the form of poor performance reviews, refusal to reinstate her on the Horizon
12 leadership team, and failure to promote her.

13 150. As a proximate result of Defendant's unlawful actions, Ms. Stonelake lost
14 wages and benefits and suffered emotional harm.

15 **Retaliation in Violation of Public Policy,**
16 **Under Common Law and RCW 49.44.211**

17 151. Plaintiff realleges and incorporates by reference as if fully set forth herein,
18 each and every allegation in the preceding paragraphs.

19 152. As alleged above, Plaintiff raised complaints about the severe safety
20 threats on the Horizon platform to children, including bullying and hate speech, and
21 inadequate safety and parental controls. Plaintiff also raised complaints about funds
22 being diverted from regulatorily-required DPA risk protection activities to the Horizon
23 mobilization.

24 153. Defendant retaliated against her by excluding her from the Horizon
25 leadership team, refusing to reinstate her on the Horizon leadership team, and failing to
26 promote her.

