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SPEAKERS

Tahmineh Dehbozorgi, Anthony Sanders, Jeff Redfern

- A** Anthony Sanders 00:00
"I'll have the law on you," shouted Mr. Buck, 'It's libel. That's what it is.' Mr. Graham gathered together his collar ends and tried to find his stud. 'I merely repeat what I've heard.'" Well, those couple lines about the law of libel are from 'Henri Learns the Language' from one of the 'Still-William' books originally published in 1925. It gives a little bit of a sense about what we mean by libel; whether you need a specific intent to tell an untruth, or whether you can simply spread rumors around to qualify as libel. We'll be talking about that in the context of the First Amendment, and more this week about the First Amendment and being online on Short Circuit, your podcast on the federal courts of appeals. I'm your host. Anthony Sanders, Director of the Center for Judicial Engagement at the Institute for Justice. We're recording this on Wednesday, November 20, 2024 and I have a couple Institute for Justice attorneys joining me. One of them has been on many times, but one of them is a first timer, so we'll start with her. I am pleased to introduce Tahmineh Dehbozorgi. I didn't say that right, did I?
- T** Tahmineh Dehbozorgi 01:44
You're almost there.
- A** Anthony Sanders 01:45
Okay, please introduce yourself, Tahmineh and tell us what you did before you came to IJ.
- T** Tahmineh Dehbozorgi 01:52
Thank you so much, Anthony. I'm pleased to be here. I'm a litigation fellow at the Institute for Justice. I just graduated from the George Washington University Law School, and I concentrated in national security and cyber security law and online speech. Also, children's privacy, was one

of the areas of law that I was always very fascinated by. I also had experience working at the Federal Communications Commission. So the issue that I will be discussing today is very near and dear to my heart. I'm also a Bruins fan, so I'm sorry for your listeners who went to USC. I do not really have any love for your team.

A

Anthony Sanders 02:35

Well, I think we have way more UCLA listeners from what I've heard. Actually, I have no idea if that's true, but it's true for today. So thank you. So Tahmineh is going to have a case from the Third Circuit about TikTok and Section 230 and the First Amendment and all those interesting things. But first we're going to hear from Jeff Redfern. So Jeff, you have this case from the 11th Circuit involving libel, and it also involves New York law and the 11th Circuit down in Florida. So what's going on here?

J

Jeff Redfern 03:09

Yeah, so there were a lot of what we call choice of law issues in this that didn't get appealed, thankfully, because I find choice of law to be an infuriating area. You know, when you have plaintiffs and defendants in different jurisdictions and you're trying to figure out where the wrong occurred. Every jurisdiction has its own rules about how you decide whose law applies. And oftentimes the parties just agree, because it's just so complicated to try to figure out how to apply these rules. So New York law applied, but the case was actually litigated in Georgia. The case is called Project Veritas v. CNN, and it's about libel and this conservative sort of guerrilla investigative journalism organization called Project Veritas. Now what happened is, back in 2021 Project Veritas was kicked off of Twitter, and the reason they were kicked off is because they posted a video in which someone who they were filming, was in front of their house, and you could see the house numbers in the background. So, Twitter said that this was a violation of their so called anti-doxing policy. You're not supposed to publish private information about individuals without their consent. So, they were kicked off and at the time it was temporary, but it became permanent. Twitter's not the defendant in this suit, though. The defendant is CNN, the venerable cable news network. What happened was CNN reported that actually Project Veritas had been kicked off of Twitter for promulgating misinformation. Now Project Veritas said, "Hey, that's not true. It was a totally different policy." They sent a letter to CNN and asked them to issue a retraction, and CNN refused. So Project Veritas sued CNN for libel. Now, after the court concluded that New York law applied, it ultimately dismissed the case, at least the District Court did, under a New York libel law doctrine called 'Substantial Truth'. Now, the idea of 'Substantial Truth' is that if the gist of what you've said about someone is true, you can't be held liable for libel just because some of the details weren't quite right. Basically, the test is would the effect of the true statement on the listeners mind have been different. Now, what does that mean? Well, a classic example that the Court of Appeals brought up was from the 1980s there was a plaintiff who had been in an adulterous relationship, apparently for about 13 years, but he was no longer in this relationship, and the newspaper reported that he was in such a relationship and had a living girlfriend. He said, "hey, you've libeled me, you called me an adulterer." And the court said, "well, okay, maybe technically you were not in that relationship at the moment this article was published, but the effect on the listeners mind is the same." You know what what's the difference between being someone who was an adulterer for 13 years and someone who is-

A

Anthony Sanders 06:32

Could be a recovering adulterer? I suppose.

J

Jeff Redfern 06:35

I suppose if you made the argument that it was a mistake, and I've, disowned it, and I've turned over a new leaf, who knows. This guy really hadn't though, if I remember the facts. Yeah, it seems like this was kind of nitpicking. And you can spin this out and imagine similar things, like, hey, "I accused somebody of, you know, cheating in law school, but I said that they cheated on the wrong exam, they actually cheated on a different one." Well, who really cares? What really matters in terms of the reputation damage, is that it was substantially true, even if the the details weren't quite right. Well, how does that apply to this case? The District Court said that the damage to your reputation as a news gathering organization is basically the same if you are accused of spreading misinformation versus being accused of doxxing someone. Well, the 11th Circuit said that is definitely wrong; that as a news organization the truth is everything. Your credibility as a purveyor of accurate facts is the lifeblood of any news organization, and that doxxing, even if it's bad, is certainly not on the same level, because it's still conveying truthful information. So the court reversed, and there was an interesting concurrence here, where Judge Carnes said, "it's a really sad state of affairs when you've got a major news organization standing up in court saying the truth doesn't really matter that much." Now I have mixed feelings about this concurrence. I agree with absolutely every word of it. I don't know how I feel about judges commenting on things that really go beyond the law. You know, it's certainly true that we would like to have our news organizations valuing the truth. I just don't know that it's the place of a judge to tell them what their journalistic ethics should be. There's also some discussion here of the Constitution, specifically the First Amendment standard under *New York Times v. Sullivan*. So libel is an issue of state tort law, but, ever since the famous Supreme Court case of *New York Times v. Sullivan*, there has been this First Amendment overlay. There are limits to what libel can do, because it can infringe on Free Speech rights if it's enforced too aggressively. And the standard is that in order to find someone liable for libel against a public figure, the plaintiff has to prove what's called 'actual malice'. Now actual malice in the law is not what malice means in the real world. It doesn't mean that you hate them and you wanted to hurt them, it just means that you knew what you said was false, or you said it with reckless disregard for its truth or falsity. Basically, that means that if you make a mistake, if you were doing your best as a news organization commenting on a public figure and you got something wrong, you are not going to be held liable because you have this First Amendment protection to do that. Now, the court said that the actual malice standard here was very easy to satisfy, because CNN was told after the fact that this was wrong and they were asked to do a retraction. And they actually reported it correctly a few days earlier, so, they clearly knew that this wasn't accurate, and they continued to stand by it. Now I think the the actual malice thing is interesting here, because *Times v. Sullivan* has actually come under fire in recent years from some commentators. And I understand the critique, I'm certainly sympathetic to the idea that if we have far too aggressive interpretation of state libel laws, that that really would chill free speech rights. But one of the strange things about *Times V. Sullivan* is the fact that the standard is different for so called public figures. It seems that embedded in the idea is that courts are deciding when it's really important to discuss certain issues or people or organizations and when it's less important to discuss them. And that's an idea that is sort of foreign to at least contemporary first amendment jurisprudence. I think the court today would be much more likely to say, "look, courts aren't in

the business of deciding what's important speech and what's not important speech. We let the listeners decide what speech they value. The whole point of the First Amendment is that we don't put a thumb on speech or on the scale when we think it's more important." So I do think that even though Times V. Sullivan is a speech protecting doctrine, there are some weird aspects of it that have come under fire. I don't think that it's going anywhere. I think that basically what you're going to see is courts aware of these criticisms, interpreting it somewhat narrowly. And there are a million examples of this, where a doctrine that comes under fire sort of shrinks in practice. A few years ago, we talked about an administrative law case, Kisor v. Wilkie, which saved basically the Chevron Doctrine for regulations, but at the same time, almost read it out of the case law by saying that it's super, super narrow, and almost never applies. Another takeaway, for me in this case is that even though this isn't a case against Twitter, I do think it suggests a way that some of these platforms like Twitter might be held liable for some of their content moderation decisions when they are purporting to be kicking people off platforms because of misinformation. I think that they are going to be vulnerable to libel suits, because that is a pretty big accusation for particularly for like a news organization. And you know, misinformation can be in the eye of the beholder. So I think that one result of litigation like this might be that platforms become less transparent about their moderation policies, because they can just say, "look, we can kick you off for any reason, and we've decided to kick you off" versus if they say "we're kicking you off because you've said untrue things," well then they might have to defend themselves in court about that, because they're saying something publicly. So I don't know, we'll see. I'm sympathetic to the idea that people should have some some recourse about arbitrary moderation policies, but I'm not sure that that's going to be the most promising avenue. But I think that people will continue to try creative ways of going after these platforms.

A

Anthony Sanders 14:02

Tahmineh, have you ever been kicked off Twitter?

T

Tahmineh Dehbozorgi 14:05

Not yet.

A

Anthony Sanders 14:07

Yeah, same here. I probably should have by now.

J

Jeff Redfern 14:10

You're not trying hard enough, Anthony.

A

Anthony Sanders 14:12

I know, I know.



Jeff Redfern 14:13

What are your thoughts about the case?



Tahmineh Dehbozorgi 14:15

I thought this is a very interesting case, especially, I agree with Jeff that the choice of law issue is not something that anybody, not even the judges, ever want to deal with. So it's good to hear that they found some solution around it. But what I think is really fascinating about I guess, is the trend of where this doctrine is going, just like First Amendment in general, and also, how do we treat publishers and speakers about the type of like borderline defamatory or libelous statements that they make? Because we see, like, for example, in the 90s, we had the Communications Decency Act where Congress was actually very interested in regulating this sort of online speech, and making sure that this newly developed Internet has some boundaries and people are not just committing felonies online. And that's why we ended up with, I don't want to spoil anything but Section 230 and it's progeny. But, the current doctrine seems to be like a relic from the past, because then in the early 2000s with Sullivan and the rest of it, we had this like expansion of First Amendment protection for this sort of speech. But, it looks like now we're going back again to this reaction to maybe the expansion of free speech to actually protect this sort of borderline defamatory or libelous statements, but at the same time protecting the rights of platforms to also kick people off of their platform, or websites, because also they can claim free speech to moderate their user base.



Jeff Redfern 16:08

Yeah, I mean one reason why people get so confused in this area, as we'll learn in the case you're about to do Tahmineh, is that the users have free speech rights, but it's a contractual right with the organization, and then other people are speaking about it on like CNN, and then the platform itself has its own free speech rights when it's speaking as a speaker. So it's a lot of moving parts to keep together. The only thing I'd like to add is the actual allegedly defamatory statement is, was where the CNN host was talking about misinformation broadly, right? And then gives this as an example. So I'll just read it here, because I think it's interesting to put it together: "We're starting to see companies cracking down to try to stop the spread of misinformation and to hold some people who are spreading it accountable... For example, Twitter has suspended the account of Project Veritas, a conservative activist, uh, activist organization. At least that [is] how they couch themselves with followers. ... But this is part of a much broader crackdown, as we mentioned, by social media giants that are promoting misinformation."



Anthony Sanders 17:17

So, I mean, one thing the court says is that she didn't exactly say that Veritas was suspended for misinformation. But in context, I mean, it's unmistakable, because in the sentences on either side. But the other thing is, misinformation that means telling lies, right, or telling like something, like a lie. So that is not accurate what she just described about, what Project Veritas was suspended for. But also, I think this is like a lot of people in the media, or probably just a

lot of Americans are guilty of this- misinformation has kind of just grown into, like a catch all about bad acting. So, if someone is doing stuff online or offline that you don't like and it involves information, you say it's misinformation. And so in her head, I wonder if at that point, she kind of thought that doxing people, which is very much not an misinformation because you're giving their actual address, is kind of the same whole thing as misinformation. It's all just a big misinformation bucket. And so that doesn't mean that she didn't have actual malice, because you should know better as an objective standard, right? But I wonder if that's actually what was going on there, and that's reflective of just a broader misuse of this kind of catch all term misinformation.

J Jeff Redfern 18:52

Yeah, I think that's plausible. I was trying to think why would they have said this when they actually knew that that's not what happened? And particularly at the time there was real concern about content moderation and what was going on on these platforms. And I think that misinformation or actual lies was like the broad category of what they were interested in. But I think you're right that other sorts of misbehavior on platforms was seen as absolutely adjacent to these and cleaning up the platform was probably seen as a holistic kind of endeavor, right?

A Anthony Sanders 18:53

Well, another very unsavory thing going on online are these videos that were on TikTok that unfortunately, very tragically led to the death of a child. So, Tahmineh tell us that story and what the Third Circuit thought of it.

T Tahmineh Dehbozorgi 19:50

Yeah, the facts of this case, Anderson v. TikTok, are extremely heartbreaking. This young lady who was a user of TikTok

A Anthony Sanders 20:02

-at 10 years old, by the way, I don't recommend it for 10 year olds.

T Tahmineh Dehbozorgi 20:05

- very young. She came across this video of this trend that was going on, where I do not want to go into graphic details of what it encourages the viewer to strangle themselves. And unfortunately, this is what happened to this young girl that she ended up actually dying from participating in this challenge that was encouraged.

J Jeff Redfern 20:38

The blackout challenge or something.

T

Tahmineh Dehbozorgi 20:41

Yes, the blackout challenge. And so the way that this case came about was that the state of this girl [Pennsylvania] sued TikTok for curating this sort of content and showing it to this girl. And their allegation relies on the fact that TikTok's algorithm actually recommended it on her for you page. It wasn't that she actually went and looked for this content. It was suggested to her by TikTok's algorithm. And that's where the core of their legal claims against TikTok are. They asked for tort damages such as strict product liability and negligence, and also a derivative from those claims was the wrongful death under Pennsylvania state law. And the district court in Pennsylvania dismissed the suit by claiming that it was barred by Section 230 immunity that shielded TikTok from lawsuits like this. And so on appeal, the Third Circuit considered the question of whether Section 230 would bar such tort claims against TikTok for curating, "harmful content," on its algorithm. And the way that the majority of the court came down on this was distinguishing what is algorithmic content, something that the algorithm on these social medias like suggests to you; for example, I have a white dog, and I constantly come across photos of dogs that look like my dog. And I always think it's weird, but I like them, and I end up spending more time clicking and liking those pictures. So that's kind of what the court was looking at, this was the type of algorithm in question. And on the other hand, was this sort of passive information, the content that was just present on the social media that you have to look for it to find it. And the courts, the majority in Third Circuit, decided that, well, when it comes to these curated contents, that means that the social media platform here, TikTok, is engaging in some sort of discretion by either AI or using any sort of mechanical means. But at the end of the day, they are actually interfering in the flow of information. They are making some decisions on what to show you, even if it's automated. So that makes them more like a speaker, more like a publisher. And so that is where the issue of Section 230 comes from. So Section 230 again- it's the hot topic of today. Gen Z especially are very familiar with this- is a part of the statute passed by Congress back in the 90s that pretty much shields social media platforms from liability as long as they engage in good faith content moderation, make sure that nobody's breaking law, nobody's engaging in any sort of drug or human trafficking. And the way that the language of the statute is designed is that if you are an interactive computer service, then you are kind of like a third party passive platform. You're just providing this platform for people to speak on. You are not a speaker. So that's why you're not liable if somebody wants to sue you based on what some user posted online. And that was the reaction to a lot of lawsuits that were happening at the time where platforms were being sued for defamatory statements. So, Congress passed the statute to make sure that the liability doesn't fall on this passive messaging board online that you know is just existing and doesn't have any sort of discretion on what is shown online. However, the Third Circuit here realizes that is changing, and TikTok here was not just a passive messaging board as members of Congress back in the 90s were considering when they drafted Section 230. In fact, it was an active speaker. And that was not just a ruling out of a vacuum. They relied on the Supreme Court decision that came out last year, *Moody v. NetChoice LLC*, and in that case, the Court also recognized that if you are a first party speaker, then you are no longer technically like shielded by Section 230. However, it doesn't mean that you would be liable. There might be other defenses available, but it means that you just get past this stage of motion to dismiss. And I think that's a very crucial point, because Justice Thomas has criticized this sort of approach, because in that case, if we're categorizing these platforms as first party speakers, that means they could claim First Amendment immunity. So either way, the platforms get just blanket immunity, and they can allow harmful videos that could lead to the death of teenagers. They could also kick people off a social media platform without facing any consequences, and

at the end of the day, nobody can actually sue them, or at least get past motion to dismiss- so, have their claims heard by a court. But, what is most interesting about this case is the concurrence by Judge Matey. He ultimately comes to the similar decision. However he would go further than what the majority did, because the majority did not reach the question of whether TikTok could still be liable for the passive content available. Judge Matey, however, goes through series of what I would call, like statutory originalism. He goes through the history of Section 230 analyzes a lot of the cases all the way since you know, a common law till recently, and tries to reconcile what Section 230 was meant to protect and what it was not meant to protect. And he comes down to the fact that this sort of content curation, as the majority said, is not something that Section 230 ever wanted to protect. When platforms start having a hand in showing you videos and cat pictures and dog pictures, and if they ultimately lead to harm, you should be able to sue them, and they should not be able to claim Section 230 immunity, because that's not the intent of Congress, and that's not what the traditional common law principles would approve as sort of this immunity for publishers, or even like free speech issues. So, at the end of the day, the issue of how we apply Section 230 immunity on platforms with students like this in the courts, remains unclear but what is interesting is that this is sort of like a first iteration of the recent Supreme Court cases that came out last term, particularly Moody, and the way that the Third Circuit has interpreted that. So I think that's why this case is very interesting.

J Jeff Redfern 27:59

And I will add that en banc review was denied just a few weeks ago, less than a month ago from when we're recording this. So, we could have a cert petition in two months. And it definitely seems like there's a circuit split on some of these issues now. So this could be going higher up.

T Tahmineh Dehbozorgi 28:18

Yeah, absolutely, because most of the circuits have this three part task: First, is it against an interactive computer service provider, aka any social media platform? Second, or does the lawsuit, the claim, treat these providers like publishers? Third, are they trying to hold these providers liable for content developed by third party users? And if the answer to all of these is yes, then Section 230 applies, and it bars the claims. However, not all circuits, as you mentioned, adhere to this sort of task, so that's why we have this massive circuit split. And it's really not clear how Section 230 actually applies.

A Anthony Sanders 28:58

Jeff, is it clear to you?

J Jeff Redfern 29:02

Absolutely not. I will say that if I were just picking up Section 230 and reading the text from scratch, it would not seem like it applies in this situation to me. It seems like the idea was to give these platforms a very limited latitude to do some content moderation to get rid of the

absolute worst material. And I think it's probably helpful to think about what the rule would have been without Section 230. Normally, if you are just a passive platform where people are posting things even before 230 you wouldn't have been held liable. The problem is that once you start moderating the content and deciding what gets to go on your platform and taking some things down, then plaintiffs could argue you've become a publisher because you're exercising discretion about what gets shown.

A

Anthony Sanders 30:01

Like an old fashioned newspaper deciding which letters to put in, or-

J

Jeff Redfern 30:04

Exactly, yeah, or even which ads to post. And basically, Congress wanted to give platforms the ability to remove some really bad content without suddenly becoming publishers. Because prior to Section 230 a lot of of these internet providers are like "Hey, we're not going to do any content moderation. That suddenly means that we're responsible for all of this. It's better to just leave it as the wild west." It reminds me a little bit of some of the the cases about government speech. So sometimes there's a dispute about whether a particular speech is private speech or government speech. So let's say you want to do a performance at city hall, and you have to ask for permission- if they rarely allow this, it might be considered government speech if the government says, "Hey, you're doing this performance, and we really like it, and we'd like to promote this and sort of share this, and we're adopting your speech as ours." In a situation like that, you probably wouldn't have a First Amendment claim if someone else tried to do it and the government said, "No, we don't want to give you this platform. It's not our speech." But if they let everyone do it, then it becomes a sort of public forum where it's no longer perceived as government speech.

A

Anthony Sanders 31:33

That's like the flag case in Boston from a couple years ago.

J

Jeff Redfern 31:36

Exactly everyone gets to fly a flag for a day outside of city hall, and suddenly that means that it's not the government's speech anymore. So, there's similar incentives in play, where the government wants to, except obviously it goes the other way, like once you're exercising more control, then it becomes your speech. But it's not clear where the line is and I think Section 230 at least pushed that line a little bit farther. It's just not clear exactly how far it did.

A

Anthony Sanders 32:09

I will say, I always get confused when I start thinking of Section 230 and so I don't have many unconfused thoughts on this one. I will say, whenever I try to refigure out how it works I turn it to our friend Mike Masnick at Techdirt, who we had on a while ago now, like three or four years

ago, to talk about a Section 230 case. And they had an interesting post over there Corbin Barthold wrote it when this case came out, they were not fans of this opinion about how Section 230 works. So I'll put a link in the show notes for that. But one interesting thing in that post is that it talks about the First Amendment standards for protection of speech, including a publisher. So if you're a publisher, if you're Twitter or Facebook and you're doing content moderation, then that's protected First Amendment activity. But then Section 230 and what is a publisher- that is like, just a different thing and so you can be a publisher under the First Amendment and not a publisher under TikTok or vice versa. And I may have that wrong, but it's not necessarily the same thing. And so you can say I am not being a publisher under Section 230 by removing this stuff, or using this algorithm to just have the third party content get to people, but curated- but I am a publisher under the First Amendment, and therefore I receive First Amendment protection for that activity. And that is how it's supposed to be. And probably a lot of people hear that and say that doesn't make any sense- but that's how it works where you have a statutory regime and a constitutional rule. But that may not be something that will hold right, like some of the contours of that, especially if like everyone agrees it's terrible that TikTok had this thing that was doing this thing. And so maybe it receives immunity and maybe it doesn't, in this case. But, is that something we can live with in the long run? Whether Congress changes law or whether the courts just going to step in and say we're going to fix it through interpretation.

J Jeff Redfern 34:32

So I think that these, these First Amendment publishing cases, despite what some people say, I don't think that they are entirely straightforward to apply to modern internet platforms. If you look at the historic cases dealing with things like newspapers or, you know, a cable TV provider that is specifically selecting which 60 channels it's going to have- that does look different than a platform that you know moderates a tiny, tiny percentage of most of the content, and isn't necessarily making conscious choices about most of it. So I don't know how all of this is going to shake out long term. I just don't think that there are very straightforward answers in the older case law,

A Anthony Sanders 35:21

I think it gets hard when you get to the level of algorithms, like in this case, because you could say content moderation, like, we delete certain comments, or we highlight certain comments that we think are interesting, and we put them on our front page. And that's all pretty clear, that's protected by Section 230. So, the argument is that an algorithm is really just kind of the same thing it's just all that on, like, massive steroids. Especially when your entire service runs on it. Like, TikTok wouldn't even be anything without an algorithm. And yet, conceptually, it's the same, but it really feels different, doesn't it? And it feels like there's not a human there. It's just this kind of AI out of control thing throwing content at us. So I don't know maybe it's just too much for 70 year old judges to figure out on the Supreme Court, but we'll see what they do whenever this gets up there.

T Tahmineh Dehbozorgi 36:16

Yeah, it's interesting for that reason, because there are distinctions that Section 230 makes on this matter, because the purpose of Section 230-and also Judge Matesy goes in depth about that

as well- was to promote algorithmic decisions to restrict access to the availability of things that the platform or the users thought was harmful, even if they were protected by the First Amendment, by the way. So that's what the Section 230 was meant to protect, that type of algorithmic decision making was fine. But, what we're seeing right now, is a criticism to the approach that the new courts are taking to bless the Section 230 immunity for everybody- is that right now, social media platforms use algorithm for a profit. And the argument is that if this is used as means to keep people on the platform, and it's not really about pushing down harmful content, then at that point, it should fall outside of Section 230 protection. That's not something Congress ever wanted to protect. Congress wanted to protect content moderation. They wanted to make sure that users are not exposed to obscene, lewd, or harmful material.

A

Anthony Sanders 37:33

Something we often forget is this was part of the 1996 Content Decency Act, or whatever they called it. And you guys are a little young to remember this, but I was in college when that act passed everyone was kind of on a libertarian, free speech bend, including a lot of people that call themselves liberals. They were just outraged that the federal government's trying to shut down the internet. And then there were all these lawsuits. And a lot of that was found unconstitutional, but Section 230 is part of it that survived. And then now today, it's remembered for very different reasons. So, it's kind of like this accident. I mean, people have said it kind of accidentally allowed the internet to thrive, maybe not for the reasons it did, but we need maybe need to remember that today, now that the internet is a different place. What, 28 years later? So well, thank you both for coming on, even though I have maybe belittled your age, or just made myself seem old, I suppose. But it's been a great conversation, a great couple cases about the the internet and society today. So please all of you, stay tuned for our next episode. And please be sure to follow Short Circuit on YouTube, Apple podcasts, Spotify and all other podcast platforms. And remember to get engaged.