

AMENDED Exhibit 1073

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Produced in Native

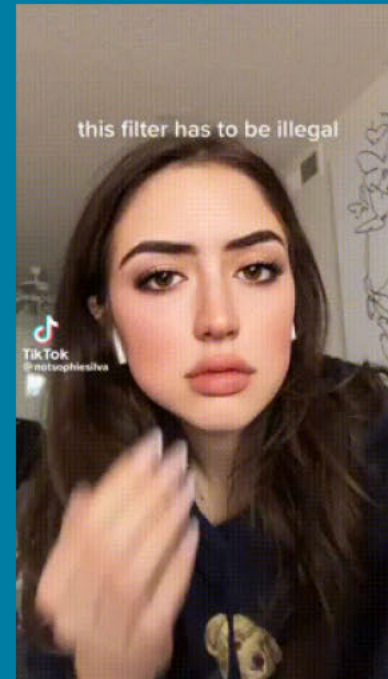
ACE Effects UXR: Deep Dive on Top Effects Pillars Vol. 4: Appearance

Facial Deformation

Participants and Global Creators had significant and sustained concerns about facial deformation effects like Bold Glamour.

For the purposes of this report, facial deformation is defined as make-up or other appearance effects that:

1. Can only be replicated in real life through surgical intervention (if at all).
2. Are designed to be realistic (e.g. fun masks are excluded).



Facial Deformation

Two participants expressed positive views about deformation effects.

For [REDACTED], they are a way to highlight and accentuate “*what you already have*,” i.e. your natural look, though she was concerned about the impact of deformation effects on people with low self-esteem.

[REDACTED] feels the effects can give people confidence by helping them look as good as they can.

“

I like the enhanced look, y’know? Even though it promotes you to wanna get [plastic surgery] done, I like the fuller lips look.

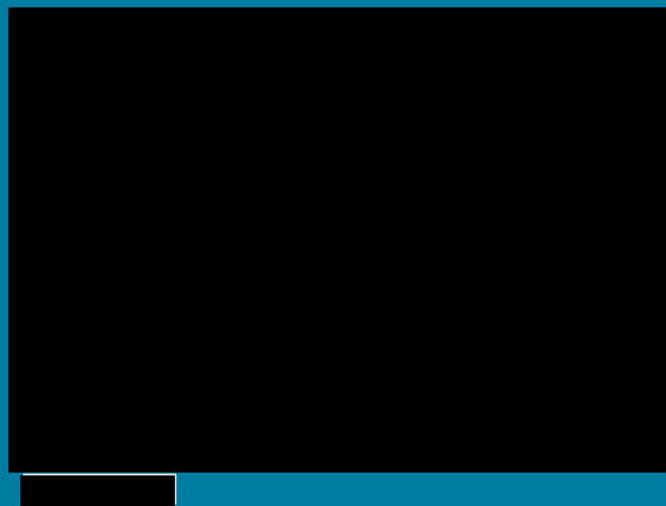
”

[REDACTED]

Facial Deformation

Specific concerns with facial deformation effects include:

- Setting unrealistic standards of beauty, especially ones that can only be achieved via [surgery](#).
- Prescribing a single definition of beauty to a global user base.
- Leaving people feeling worse about how they look.
- The psychological impact of these effects on the well-being and self-perception of minors.



Facial Deformation

These concerns are not new. Even before the advent of new technical capabilities like facial deformation, research at [Google](#) and [elsewhere](#) established clear links between online images and issues like body dysmorphia and self esteem.

Given the increased sophistication of current technologies, it is reasonable to predict negative outcomes in line with or potentially worse than what we've previously seen.

“

I have friends [who] will only show their face when using those filters [...]. I think they can't appreciate the natural beauty or natural side of themselves.

”



Facial Deformation

Participants talked at length about how facial deformation effects made them feel worse about their natural appearance.

In particular, they described a causal relationship in which the use of deformation effects left them actively feeling worse about the way they look.



Facial Deformation

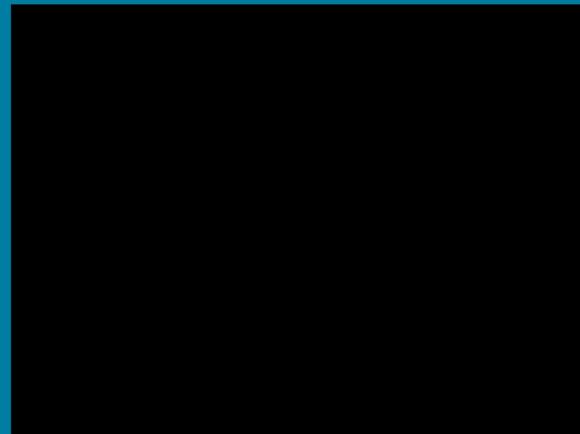
Some participants talked about the social stigma and shame that accompanies the use of facial deformation effects.

This social pressure is one reason why these effects have an especially low play-to-post conversion rate; often when creators do post videos of themselves using them, it's to mock or criticize the effects.



Facial Deformation

Concerns about the ethical implications of facial deformation effects were shared by all Global Participants who commented on the topic, including those who work within the fashion and beauty industries.



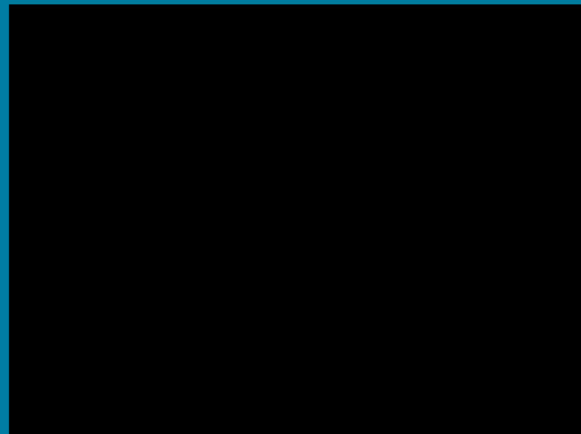
Yashi, F, Global Creator

1.58m Subscribers

Facial Deformation

Global Creators explicitly stated that they believe facial deformation-type effects are contrary to YouTube's values. They believe that having these effects on the platform could jeopardize YouTube's relationship with brands and creators.

Without explicitly naming YouTube, participants suggested a halo effect for platforms that reject these effects.



Amanda, F, Global Creator

372k Subscribers

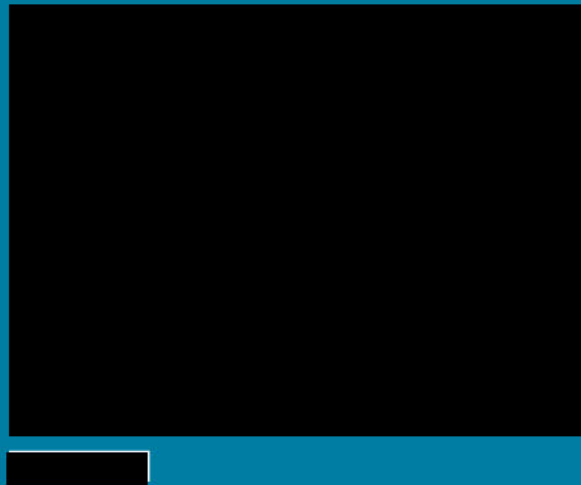
“I think YouTube should be trying to bring authenticity and not bring that toxic advertising world [of airbrushing] into [the platform].”

Ollie, M, Global Creator

715k Subscribers

Facial Deformation

Participants noted that it used to be obvious when deformation-type effects were being used. But as the technology has improved, they've become more convincing and difficult to detect.



There is a belief that sliders and other user controls exacerbate rather than mitigate harm by making deformation effects harder to detect.

Facial Deformation

Creators agreed that if platforms do include these effects, transparent and explicit labeling that an effect is active is essential.

Some noted that TikTok's in-video effect labeling was inadequate because the name of an effect alone doesn't necessarily tell viewers what kind of effect it is.

“

I want to reiterate this point about transparency: I'm for it if you want to use a beauty filter, but it should be very clearly labeled that the person has it on.

”

Becky, F, Global Creator

590k Subscribers

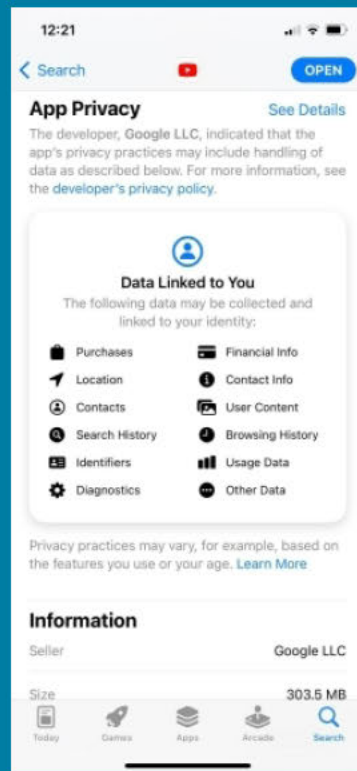
“TikTok has a little feature that says if they’re using a filter. [But] there’s definitely a lot of filters where I don’t think I’ve noticed.”



Facial Deformation

Introducing effects “nutrition labels” similar to those used by Apple for privacy on iOS is another option to provide creators with transparency about what an effect does.

Labels could list different physical features that are altered by effects, and in what way(s), as well as other key information such as user edu, usage examples, attribution, etc.



Facial Deformation

Participants acknowledged inconsistencies between their action and rhetoric when it comes to make-up effects of all types.

Though participants are aware of the harms inherent in even non-deformation effects, they still use them – although in one case this performative contradiction contributed to a creator quitting TikTok.



Facial Deformation

Defining what makes deformation effects “better” quality is a paradox: the technically better the effect is, the more social harm it’s considered to do.

At the same time, however, no one wants to use an unconvincing or poor quality make-up effect.

“

Definitely how well developed they are, which at the same time can be kind of hypocritical because if they are more well developed, then is it more harmful, or is it better? I don't know.

”

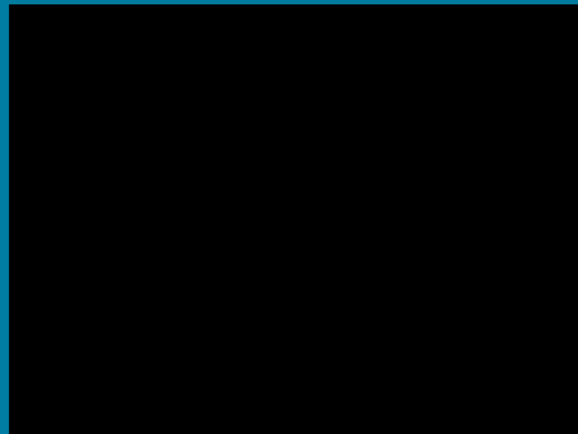
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Prompt: “What makes some make-up effects better or worse than others?”

Facial Deformation

Key factors determining the quality of a platform's make-up offering are:

- The range / volume of effects.
- Ease of use / general usability.
- Subtle, natural, and realistic effects that complement a creator's authentic look.

The final point echoes prior design work on make-up that highlighted the trend of "[natural beauty](#)."



RoseAngel, Global Creator

887k Subscribers

“The more realistic and the more natural [is better], so I would say a subtle effect is better than an effect that’s super wild or can wrongly portray your face.”

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