

AMENDED Exhibit 111

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



META3047MDL-014-00255333-META3047MDL-014-00255333

Document Provided in Native Format



INSTAGRAM TEEN WELL- BEING STUDY: US TOPLINE FINDINGS

February, 2019



NEGATIVE EXPERIENCES ON INSTAGRAM

NEGATIVE EXPERIENCES ON INSTAGRAM: SUMMARY OF KEY FINDINGS



1 Teens that feel pressure to look perfect, spending too much time, and fear of missing out often on IG are less likely to be satisfied with various dimensions of their well-being

2 These issues are also most prevalent on IG than any other social app

- Specifically, the pressure to look perfect is significantly more common on Instagram than all other apps

3 While the general messaging of “Connecting me to my friends” is the most preferred, “Discovering new things to try” may be another effective messaging to address various issues

Frequency of Negative Experiences on Instagram

% Often + Very Often Among Teen IG MAP



MISSING OUT AND SPENDING TOO MUCH TIME ON IG ARE LIKELY TO “GO TOGETHER”



Overlap of Negative Experiences on Instagram
Among Teen IG MAP

Issues Experienced Often + Very Often Column %	Feeling like I have to look perfect (a)	Feeling like I waste too much time on social media (b)	Feeling like I'm missing out on real life (c)	Seeing too much inappropriate content (d)	Worrying about how my posts or photos will be used (e)	Being contacted by strangers (f)	Seeing my friends or followers argue too much (g)
Feeling like I have to look perfect	-	65%	72% d	63%	73% d	67%	71%
Feeling like I waste too much time on social media	48%	-	67% adef	54%	53%	53%	59% a
Feeling like I'm missing out on real life	43%	55% a	-	50%	53% a	51%	59% a
Seeing too much inappropriate content	34%	40%	45% a	-	47% a	44% a	52% ab
Worrying about how my posts or photos will be used	40%	39%	48%	47%	-	51% ab	54% ab
Being contacted by strangers	36%	39%	46% a	44%	50% ab	-	46% a
Seeing my friends or followers argue too much	36%	40%	49% a	48% a	50% ab	43%	-
n-size	315	231	189	171	171	169	158

Q12. How often have you done or experienced each of the following on Instagram?
US: n=1,000

TOO MUCH TIME ON INSTAGRAM ARE CORRELATED WITH ONE ANOTHER



Correlation of Negative Experiences on Instagram
Among Teen IG MAP

Issues Experienced Bivariate Correlation Scores	Feeling like I have to look perfect	Feeling like I waste too much time on social media	Feeling like I'm missing out on real life	Seeing too much inappropriate content	Worrying about how my posts or photos will be used	Being contacted by strangers	Seeing my friends or followers argue too much
Feeling like I have to look perfect		0.465	0.539	0.380	0.496	0.404	0.426
Feeling like I waste too much time on social media	0.465		0.623	0.467	0.470	0.390	0.450
Feeling like I'm missing out on real life	0.539	0.623		0.460	0.518	0.451	0.513
Seeing too much inappropriate content	0.380	0.467	0.460		0.460	0.439	0.515
Worrying about how my posts or photos will be used	0.496	0.470	0.518	0.460		0.424	0.531
Being contacted by strangers	0.404	0.390	0.451	0.439	0.424		0.464
Seeing my friends or followers argue too much	0.426	0.450	0.513	0.515	0.531	0.464	

Q12. How often have you done or experienced each of the following on Instagram?
US: n=1,000

IN GENERAL, "INSTAGRAM HELPS ME BY CONNECTING ME WITH MY FRIENDS" IS THE CLEAR WINNING MESSAGE AMONG THOSE EVALUATED



About 4 in 10 ranked this message as their top message (41%)

Key Metrics Across Instagram Messaging

Among Teen IG MAP

■ = Top Message for Each Metric

Key Metrics	Instagram helps me feel good by connecting me to my friends (a)	Instagram helps me feel good by connecting me with people who support me (b)	Instagram helps me feel good by letting me show people who I really am (c)	Instagram helps me feel good by helping me discover new things to try (d)	Instagram helps me feel good by encouraging people to be kind to each other on its app (e)
Appeal (% Very + Extremely)	64% cde	63% cde	44%	43%	52%
Is Believable (% Describes Very + Extremely Well)	52% de	50% e	44%	40%	39%
Makes me more Likely to use IG (% Describes Very + Extremely Well)	52% cd	52% cd	42%	36%	47% d
Fits Well with my Perceptions of IG (% Describes Very + Extremely Well)	53% d	49% d	44%	39%	45%
Rank #1	41% bcde	17% e	14%	18% ce	11%

Q16: How appealing is this statement about Instagram? | Q17: How well does each of the following describe this statement about Instagram? | Q18: Which statement do you prefer the most?
US: Base size varies depending on app assignment (n=199-201)

TEENS FEEL PRESSURE TO LOOK PERFECT ON INSTAGRAM MORE THAN ANY OTHER APP



Older teen girls in particular are most likely to experience this often on IG
They are also less likely to be satisfied with various dimensions of well-being
While "Connecting me to my friends" is less a preferable messaging, there is no clear alternative

Feeling Pressure to Look Perfect

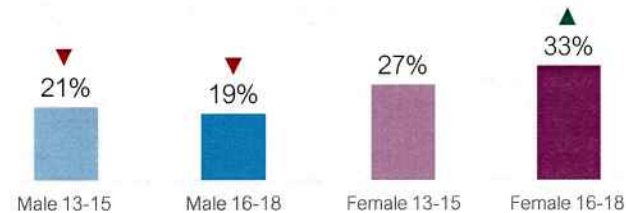
Satisfaction of Well-Being Dimensions

Among Teens who Often Feel Pressure to Look Perfect on IG

Well-Being Dimension	% Very + Somewhat Satisfied
My relationship with family	80%
My social media life	79%
My relationship with friends	79% ▼
My performance at school	73%
My social life	71% ▼
My overall health and fitness	70% ▼
My relationship with classmates	70% ▼
My extracurricular activities	68%
My eating habits	66% ▼
My energy levels	63% ▼
My overall level of confidence	62% ▼

Age and Gender Distribution

Among Teens who Often Feel Pressure to Look Perfect on IG



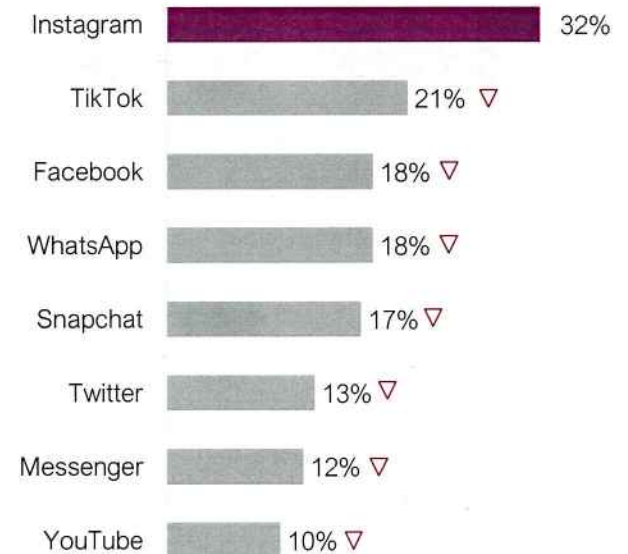
Messaging Rank

Among Teens who Often Feel Pressure to Look Perfect on IG

Instagram helps me feel good by...	Rank #1
Connecting me to my friends	34% ▼
Connecting me with people who support me	18%
Letting me show people who I really am	16%
Helping me discover new things to try	18%
Encouraging people to be kind to each other on its app	13%

Apps Where this Issue Occurs Often + Very Often

Among Teen IG MAP who use each site monthly or more



Q2. T2B - How satisfied are you with each of the following areas of your life? | Q12 T2B - How often have you experienced each of the following on Instagram? | Q18: Which statement do you prefer the most? | Q12/19. Have you ever experienced any of the following while using [pipe: App]? US: n=315

*Base sizes vary depending on the app (n=140-1,000)

△ ▼ Arrows indicate values significantly higher/lower than IG
▲ ▼ Arrows indicate values significantly higher/lower than teens who do not experience this issue at 95% confidence

WHILE APP ADDICTION IS COMMON ON IG, IT ALSO OCCURS ON MANY OTHER APPS



Older teens girls are most likely to experience this issue and also have lower well-being scores in general
Beyond “Connecting me to my friends” “Helping me discover new things to try” and “Connecting me with people who support me” are preferable messaging

Feeling Like I Waste too Much Time on Social Media

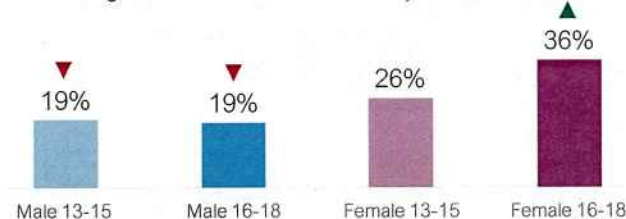
Satisfaction of Well-Being Dimensions

Among Teens who Often Feel Like They Waste Time on IG

Well-Being Dimension	% Very + Somewhat Satisfied
My relationship with friends	81% ▼
My social media life	77%
My relationship with family	77% ▼
My relationship with classmates	74%
My performance at school	74%
My social life	73%
My overall health and fitness	69% ▼
My extracurricular activities	65% ▼
My overall level of confidence	65% ▼
My eating habits	63% ▼
My energy levels	61% ▼

Age and Gender Distribution

Among Teens who Often Feel Like They Waste Time on IG



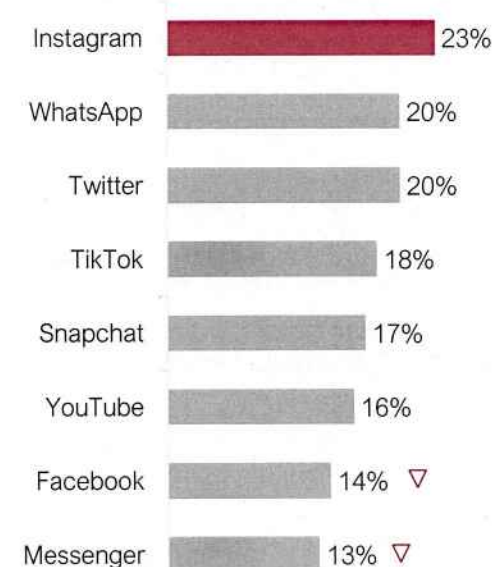
Messaging Rank

Among Teens who Often Feel Like They Waste Time on IG

Instagram helps me feel good by...	Rank #1
Connecting me to my friends	36%
Helping me discover new things to try	19%
Connecting me with people who support me	18%
Encouraging people to be kind to each other on its app	13%
Letting me show people who I really am	13%

Apps Where this Issue Occurs Often

Among Teen IG MAP who use each site monthly or more



Q2. T2B - How satisfied are you with each of the following areas of your life? | Q12 T2B - How often have you experienced each of the following on Instagram? | Q18: Which statement do you prefer the most? | Q12/19. Have you ever experienced any of the following while using [pipe: App]? US: n=231
*Base sizes vary depending on the app (n=140-1,000)

△ Arrows indicate values significantly higher/lower than IG
▲ Arrows indicate values significantly higher/lower than teens who do not experience this issue at 95% confidence

RESONATE WITH THE MESSAGING OF “INSTAGRAM HELPS ME DISCOVER NEW THINGS TO TRY”



This issue is most likely to be experienced among older girls (16-18) followed by younger boys (13-15)
These teens are also less satisfied across various dimensions of well-being

Feeling Like I'm Missing out on Life

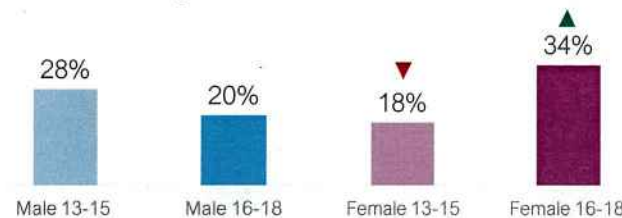
Satisfaction of Well-Being Dimensions

Among Teens who Often Feel FOMO on IG

Well-Being Dimension	% Very + Somewhat Satisfied
My relationship with friends	78% ▼
My relationship with family	77% ▼
My social media life	76% ▼
My performance at school	75%
My relationship with classmates	72%
My social life	71% ▼
My overall health and fitness	68% ▼
My extracurricular activities	65% ▼
My eating habits	65% ▼
My overall level of confidence	63% ▼
My energy levels	62% ▼

Age and Gender Distribution

Among Teens who Often Feel FOMO on IG



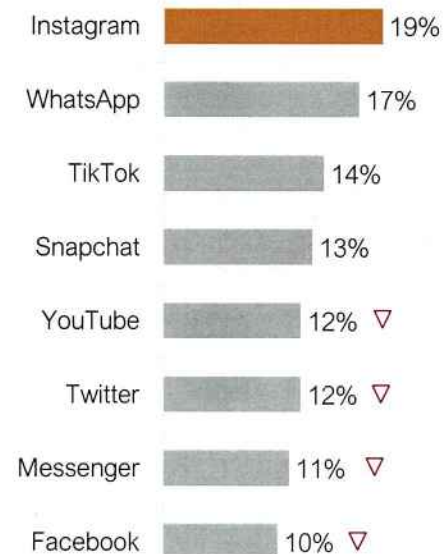
Messaging Rank

Among Teens who Often Feel FOMO on IG

Instagram helps me feel good by...	Rank #1
Connecting me to my friends	34% ▼
Helping me discover new things to try	24% ▲
Connecting me with people who support me	14%
Encouraging people to be kind to each other on its app	14%
Letting me show people who I really am	13%

Apps Where this Issue Occurs Often

Among Teen IG MAP who use each site monthly or more



Q2. T2B - How satisfied are you with each of the following areas of your life? | Q12 T2B - How often have you experienced each of the following on Instagram? | Q18: Which statement do you prefer the most? | Q12/19. Have you ever experienced any of the following while using [pipe: App]? US: n=189

*Base sizes vary depending on the app (n=140-1,000)

▲ ▼ Arrows indicate values significantly higher/lower than IG
▲ ▼ Arrows indicate values significantly higher/lower than teens who do not experience this issue at 95% confidence

THOSE WHO EXPERIENCE THIS ISSUE DO NOT REPORT LOWER WELL-BEING



Likely due to their age, younger teens (13-15) are the most likely to experience this issue
Beyond "Connecting me to my friends", "Helping me discover new things to try" is the next most preferred messaging

Seeing too Much Inappropriate Content

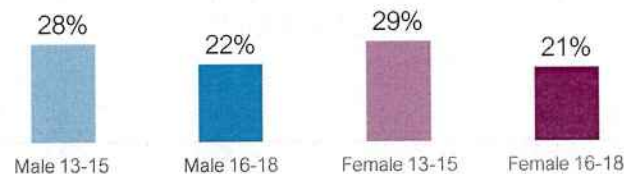
Satisfaction of Well-Being Dimensions

Among Teens who Often See Inappropriate Content on IG

Well-Being Dimension	% Very + Somewhat Satisfied
My relationship with friends	86%
My relationship with family	84%
My social media life	81%
My social life	78%
My performance at school	75%
My relationship with classmates	75%
My overall health and fitness	75%
My overall level of confidence	73%
My eating habits	73%
My extracurricular activities	70%
My energy levels	70%

Age and Gender Distribution

Among Teens who Often See Inappropriate Content on IG



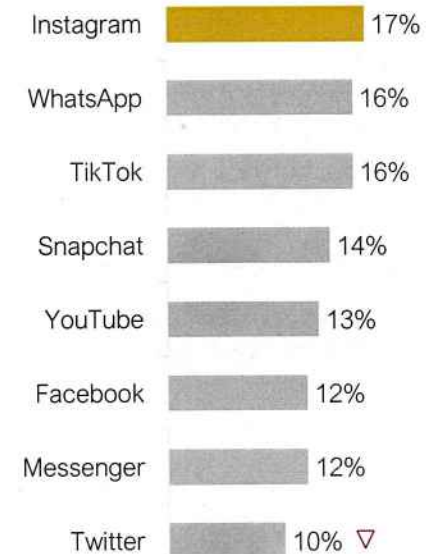
Messaging Rank

Among Teens who Often See Inappropriate Content on IG

Instagram helps me feel good by...	Rank #1
Connecting me to my friends	39%
Helping me discover new things to try	22%
Letting me show people who I really am	14%
Encouraging people to be kind to each other on its app	13%
Connecting me with people who support me	12%

Apps Where this Issue Occurs Often

Among Teen IG MAP who use each site monthly or more



Q2. T2B - How satisfied are you with each of the following areas of your life? | Q12 T2B - How often have you experienced each of the following on Instagram? | Q18: Which statement do you prefer the most? | Q12/19. Have you ever experienced any of the following while using [pipe: App]? US: n=171

*Base sizes vary depending on the app (n=140-1,000)

▽ Arrows indicate values significantly higher/lower than IG

▴ Arrows indicate values significantly higher/lower than teens who do not experience this issue at 95% confidence

ABOUT HOW THEIR CONTENT WILL BE USED DO NOT EXHIBIT LOWER LEVELS OF WELL-BEING

Younger teens (13-15) are more likely to experience this issue



Worrying about how Posts or Photos will be Used

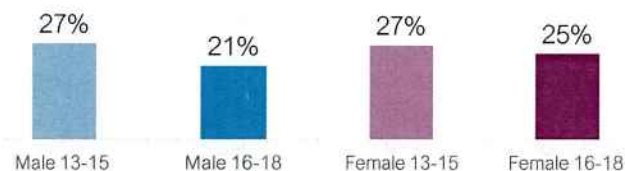
Satisfaction of Well-Being Dimensions

Among Teens who Often Worry about how Posts will be used on IG

Well-Being Dimension	% Very + Somewhat Satisfied
My relationship with friends	84%
My relationship with family	82%
My social media life	82%
My social life	78%
My relationship with classmates	78%
My performance at school	77%
My extracurricular activities	75%
My overall health and fitness	74%
My energy levels	72%
My overall level of confidence	71%
My eating habits	71%

Age and Gender Distribution

Among Teens who Often Worry about how Posts will be used on IG



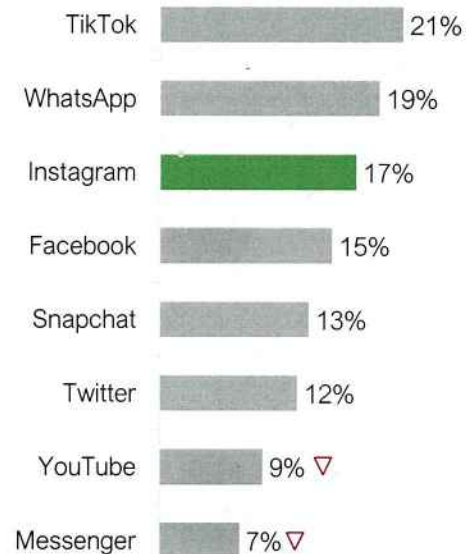
Messaging Rank

Among Teens who Often Worry about how Posts will be used on IG

Instagram helps me feel good by...	Rank #1
Connecting me to my friends	33% ▼
Helping me discover new things to try	20%
Connecting me with people who support me	17%
Letting me show people who I really am	16%
Encouraging people to be kind to each other on its app	13%

Apps Where this Issue Occurs Often

Among Teen IG MAP who use each site monthly or more



Q2. T2B - How satisfied are you with each of the following areas of your life? | Q12 T2B - How often have you experienced each of the following on Instagram? | Q18: Which statement do you prefer the most? | Q12/19. Have you ever experienced any of the following while using [pipe: App]? US: n=171

*Base sizes vary depending on the app (n=140-1,000)

△ ▼ Arrows indicate values significantly higher/lower than IG
 ▲ ▼ Arrows indicate values significantly higher/lower than teens who do not experience this issue at 95% confidence

WHILE BEING CONTACTED BY STRANGERS IS AN ISSUE, IT IS NOT ALSO ASSOCIATED WITH LOWER LEVELS OF WELL-BEING



While “Connecting me to my friends” is the most preferred messaging, it is less preferred than for other issues; “Helping me discover new things to try” is the next most preferred messaging

Being Contacted by Strangers

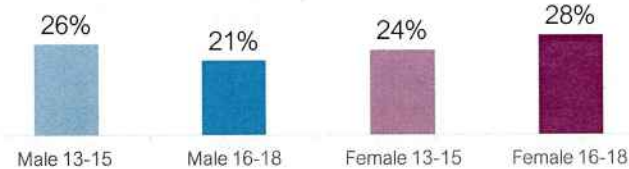
Satisfaction of Well-Being Dimensions

Among Teens who are Often Contacted by Strangers on IG

Well-Being Dimension	% Very + Somewhat Satisfied
My relationship with friends	85%
My relationship with family	81%
My social media life	81%
My social life	79%
My relationship with classmates	75%
My extracurricular activities	75%
My performance at school	73%
My overall level of confidence	73%
My overall health and fitness	73%
My eating habits	67%
My energy levels	66%

Age and Gender Distribution

Among Teens who are Often Contacted by Strangers on IG



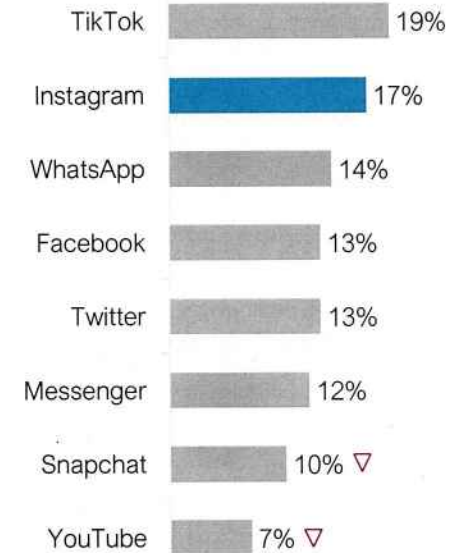
Messaging Rank

Among Teens who are Often Contacted by Strangers on IG

Instagram helps me feel good by...	Rank #1
Connecting me to my friends	32% ▼
Helping me discover new things to try	22%
Connecting me with people who support me	18%
Letting me show people who I really am	15%
Encouraging people to be kind to each other on its app	13%

Apps Where this Issue Occurs Often

Among Teen IG MAP who use each site monthly or more



Q2. T2B - How satisfied are you with each of the following areas of your life? | Q12 T2B - How often have you experienced each of the following on Instagram? |

Q18: Which statement do you prefer the most? | Q12/19. Have you ever experienced any of the following while using [pipe: App]? US: n=169

*Base sizes vary depending on the app (n=140-1,000)

▽ Arrows indicate values significantly higher/lower than IG

▲ Arrows indicate values significantly higher/lower than teens who do not experience this issue at 95% confidence

TO RESONATE WITH MESSAGING SURROUNDING BEING KINDER TO EACH OTHER ON THE APP



Older girls are least likely to experience this issue

This issue is also not likely to be associated with lower well-being scores

Seeing friends argue is most common on Facebook and Twitter

Seeing Friends / Followers Argue too Much

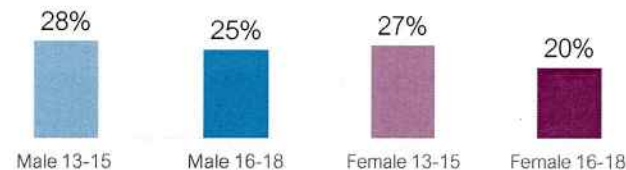
Satisfaction of Well-Being Dimensions

Among Teens who Often See Followers Argue on IG

Well-Being Dimension	% Very + Somewhat Satisfied
My relationship with friends	84%
My relationship with family	84%
My social media life	83%
My social life	81%
My relationship with classmates	81%
My extracurricular activities	78% ▲
My performance at school	78%
My overall health and fitness	77%
My overall level of confidence	75%
My eating habits	73%
My energy levels	69%

Age and Gender Distribution

Among Teens who Often See Followers Argue on IG



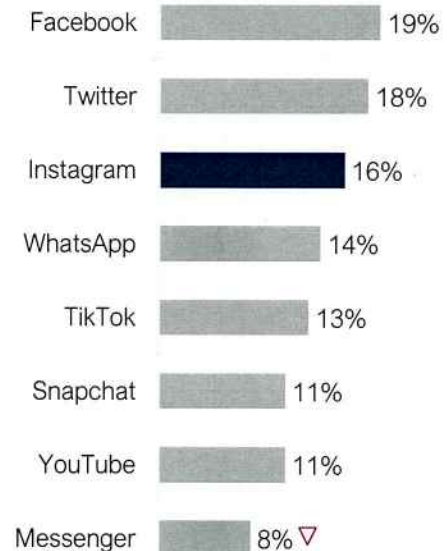
Messaging Rank

Among Teens who Often See Followers Argue on IG

Instagram helps me feel good by...	Rank #1
Connecting me to my friends	36%
Helping me discover new things to try	20%
Encouraging people to be kind to each other on its app	16% ▲
Connecting me with people who support me	16%
Letting me show people who I really am	12%

Apps Where this Issue Occurs Often

Among Teen IG MAP who use each site monthly or more



Q2. T2B - How satisfied are you with each of the following areas of your life? | Q12 T2B - How often have you experienced each of the following on Instagram? | Q18: Which statement do you prefer the most? | Q12/19. Have you ever experienced any of the following while using [pipe: App]? US: n=158

*Base sizes vary depending on the app (n=140-1,000)

▲ ▼ Arrows indicate values significantly higher/lower than IG

▲ ▼ Arrows indicate values significantly higher/lower than teens who do not experience this issue at 95% confidence

