

AMENDED Exhibit 1151

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

10/9/2018, 4:56 PM UTC
Labels
type: document

Quip

Discover Feed and Ads Targeting (including Moving Monetization Content Tagging to Snapgraph)

Monetization

JIRA: TBD

GTM: 5/31/2019

PM: [REDACTED] Platform Integrity: Althea Tupper, [REDACTED]

Context

Goals

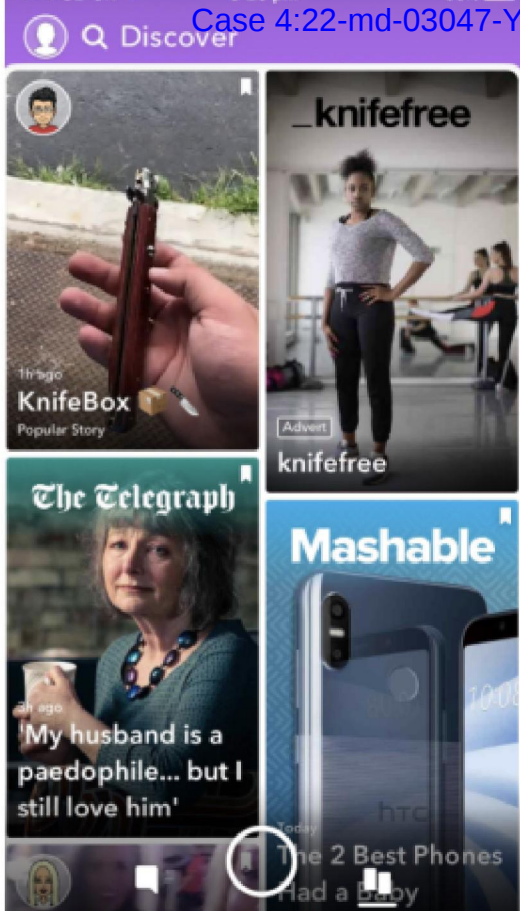
In the future, content (Discover, Suggested Popular/VIP Users) and ads will be more closely linked together, making a better user experience for all and keeping Snapchatters on the platform for a longer period of time.

To do this, we need to assess accounts and content more regularly and ingest more frequent signals. Accounts change all the time (e.g. Kylie moving from influencer to beauty maven), so we need to make sure that our reviewers are looking at the latest content.

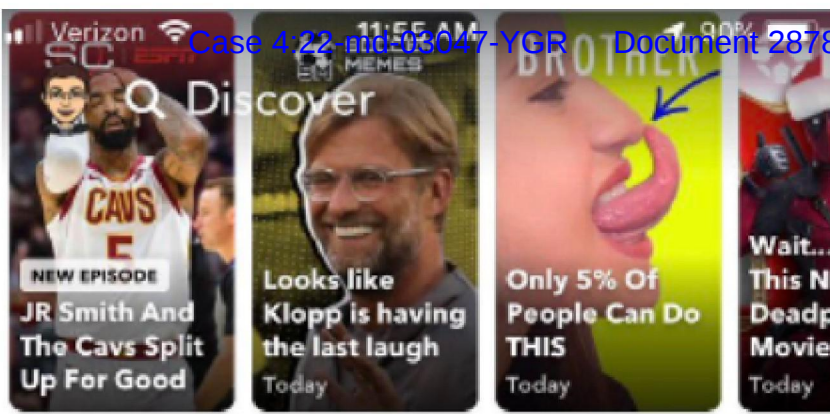
- Near term, use Snapgraph assignment of Brand Unsafe to feed to Ads Targeting and Measurement tool
- Longer term, tag in Snapgraph after content "goes live" so that we don't affect turnaround time; aggregate at the account level for the SLCs and SCCs that are
- Longer term, if we are going to infer information about accounts we need to look beyond a 1 day window for an active story (e.g. 28 day window)

Real Life Risk Scenarios

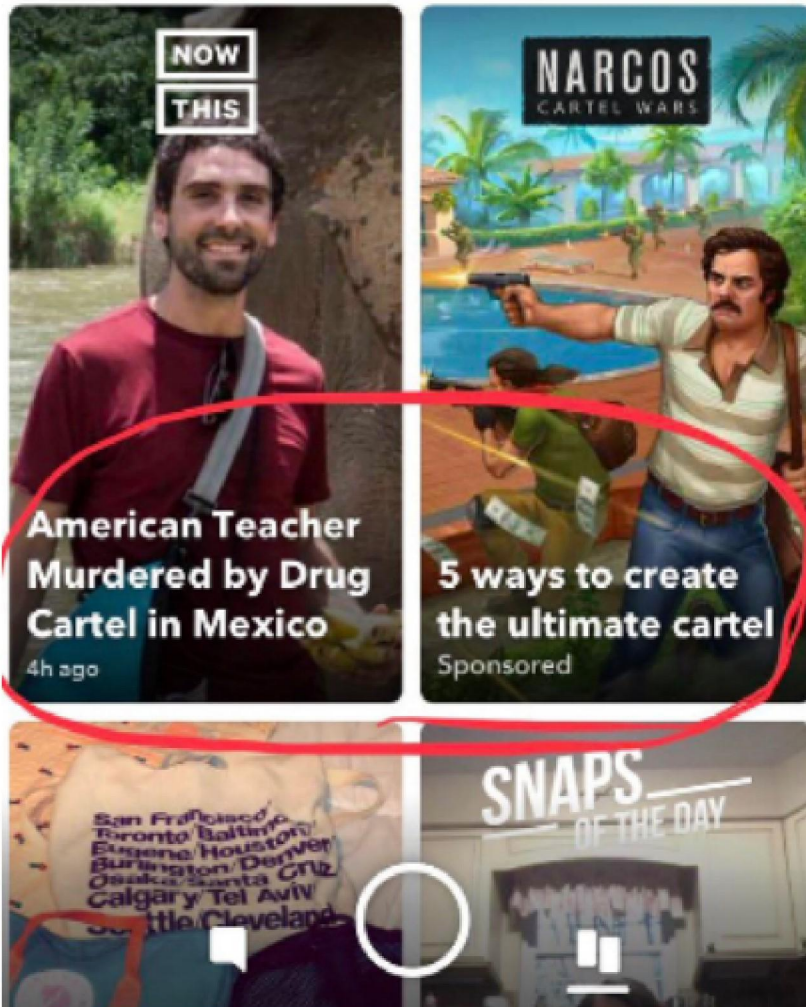
- *Knifebox*: Account featuring decorative knives featured on Discover next to an Anti-Knife Violence campaign in the UK.



- *Narcos*: Discover story about teacher being killed by a Mexican drug cartel next to *Narcos Cartel Wars* video game advertisement.



For You



- [Hypothetical] Women's Rights / Birth Control Ad and Kavanaugh Content Story:

Supporting Documentation

Existing Flow

Currently, the Monetization Tagging Team is using the **Content and Audience Taxonomy** to tag several different elements of public facing content — Accounts (including Brand Safety), Shared Stories and Discover Snaps.

Account and brand safety review

Moderators navigate to the “Account” or “Brand Safety” tabs and are given a list of accounts. Each account features their audience size, country, profile type and views (over a 28 day period). This data is used to influence “interest vectors”. Moderators tag each account where they are able to find a live story with the Snap

Lifestyle Category, Account Type and Content Category. There is a max of 3 that moderators are asked to tag for in the SLCs and SCCs. Only one Account Type is selected.

In order to be considered for Monetization Tagging it needs

Tagging

AccountShared StoryDiscoverBrand SafetyDiscover SnapBrand

Prod Version: Oct,24atupper

Search...

Search

View

Profile Type

Country

Not Reviewed Ac

All Profiles

All Countries

num of rows:

332,954

Prev Page

1

Next Page

Audience size

Snap view count

Snap Lifestyle Category

Account Type

Content Category

Action

Audience Size:

37,684,016

Country:

US

Profile:

official

Views (over 28 days):

2,151,904,269

kylizzlemynizzl

king kylie | kylie | kylie jenner | kylie | kylie | kardashian | kylie | kylie | queen kylie | ky

save

Tagging

AccountShared StoryDiscoverBrand SafetyDiscover SnapBrand

Prod Version: Oct,24atupper

Search...

Search

View

Profile Type

Country

Not Reviewed Brand Safeties

All Profiles

All Countries

num of rows:

53,526

Prev Page

1

Next Page

Audience size

Snap view count

Snap Lifestyle Category

Profile Type

Account Category

Action

Audience Size:

850,616

Country:

US

Profile:

popular

Views (over 28 days):

4,829,461

lyssa2good

save

There is no visibility into how large the queue is, the backlog, or how data is refreshed (including when accounts will be added back into the queue).

Discover snap Tagging

Similar to Account and Brand Safety tagging, on the Discover Snap tab, a portion of a Publisher's Discover story will be shown to the moderator. The moderator then tags it with the relevant Snap Lifestyle Category and Snap Content Category (max of 3 each is best practice).

View

Not Reviewed Discover Snaps

num of rows: 290,907

Prev Page

1

Next Page

Discover Snap ID

Article ID: 6283113836576784 Vertical

Category

Action

Functional Requirements

Concept

Current tooling for the Monetization Tagging team is in a custom tool that was created without a Quip outlining design decisions.

Detailed tooling needs

- Way to “bulk tag” or tag a selected number of accounts as “Brand Unsafe”
- Consensus voting per tag (e.g. uses the mode to show the most common tags for the Account or Discover Snap)
- Allows for ingestion of Publisher tags
- Aggregate individual Snap tagging from Discover VIP / Popular User tagging to assign tags per account vs. per Snap
- Allow for the ability to assign a MOAT around the content or account due to the sensitive nature of the content
- Pre-population of most common SLCs and SCCs for Accounts and Publisher content based off of 28-day rolling history (assumption is that account is not going to change drastically in 28 days)
- *Reporting*: In-tool reporting that provides readily accessible information on Agent performance (number of Accounts, Brand Safety, Discover Snaps tagged per day and in aggregate), frequently used tags by content category, total amount of Accounts vs. number of accounts tagged (e.g. percentage complete), etc.
- *Reporting*: Shows the tag results per Agent (currently shows the most current tag result)
- *Quality*: Quality assessment and review capabilities (e.g. trusted sets)
- *Quality*: Easily audit results from Taggers
- *User Roles*: Admin or Super User Access
- Re-define Type 1 and Type 2 such that Type 2 is the indicator for not serving ads against and Type 1 we are selective on the Ads we show next to that content.

Suggested MOAT Criteria

Sheet10

	A	B	C	D	E
1	scc id	scc path	scc L1/L2	scc L1/L2	What sccs not to show

2	SCC_002	/Adult-Oriented/Pin-ups & Models	L1	L1	Any other L1s
3	SCC_003	/Adult-Oriented/Porn & Nudity	L2	L2	No Ads / All Content (Moat)
4	SCC_2301	/Sensitive Subjects/Business Trouble	L1	L1	Any other L1s
5	SCC_2302	/Sensitive Subjects/Controversial Social Issues	L1	L1	Any other L1s
6	SCC_2303	/Sensitive Subjects/Death & Tragedy	L1	L2	No Ads / All Content (Moat)
7	SCC_2304	/Sensitive Subjects/Drugs & Alcohol	L1	L1	Any other L1s
8	SCC_2311	/Sensitive Subjects/Gambling & Wagering	L1	L1	Any other L1s
9	SCC_2305	/Sensitive Subjects/Protests & Political Conflict	L1	L1	Any other L1s
10	SCC_2306	/Sensitive Subjects/Profanity & Rough Language	L1	L1	Any other L1s
11	SCC_2307	/Sensitive Subjects/Sensational & Shocking	L1	L2	No Ads / All Content (Moat)
12	SCC_2308	/Sensitive Subjects/Sexually Suggestive	L1	L1	Any other L1s
13	SCC_2309	/Sensitive Subjects/War, Crime & Conflict	L1	L1	Any other L1s
14	SCC_2310	/Sensitive Subjects/Weapons &	L1	L1	Any other L1s

Risks

There is certain content that we have a higher risk showing ads around. There are several scenarios that could occur:

- Showing ads as a tile within Discover next to a particular sensitive account or piece of publisher content
- Showing ads within publisher content that is sensitive
- Showing ads interstitially between accounts

Events to Track

- tbd

Open Issues or Questions

- Do all the Monetization Tagging accounts in the Ad Targeting and Measurement tool align with what's been moderated by the Discover Team in the past 6 months? How many accounts overlap and how many do not?
- How do we proactively handle accounts that have not had an active story?
- How long can we keep account history for moderators?
- What's the impact to revenue with the proposed MOAT criteria above?
- How do we link this data to the ads tagging that is being done today? Ads tagging is happening in Oh Snap!

Owners

Sheet11

	Department	Reviewer
1	Engineering	
2	Business	
3	Design	
4	Legal (Non-Privacy)	

Background: Types of Ads and Ad Placement

Types of Ads

There are several different types of Ads that can be placed on Snapchat:

- *Story Ad (formerly titled Promoted Stories):* A collection of Snap Ads around a product category [Note: Ads are dynamically inserted throughout the feed and tile will still remain until the feed is refreshed or the user exits the Discover section.]
- *Snap Ad + Deeplink:* Swipe to a direct location within an advertiser's app or a 3rd party app

- *Snap Ad + Webview*: Swipe directly into the advertiser's website
- *Shoppable Snap Ad*: Addition of shoppable tiles to an advertiser's top Snap to feature particular products or services
- *Story Ad + Swipe Up to AR Lens*:
- *Sponsored Lenses*:
- *Commercials*: Unskippable content from an advertiser

For a more detailed reference, please visit the [Sales Hub](#).

Ad Placement

There are several different places where Ads can be placed on Snapchat.

- *Content Interstitial Ads*: Ads that appear between content streams, and puts two pieces of content together (e.g. between "For You" content, Publisher content)
- *Discover Ads*: Ads within a Discover Snap Publisher story
- *Top-level Story Ads*: Ads that appear in the Discover Feed as tiles

Departments Involved in Brand Safety for Discover Content

Ad Review & Integrity

Ads Targeting

- Targeted Geofences
- IP Targeting
- Targeted Users
- Targeting Tags

Safeguards

- *Proactive*: Each recommended content surrounding a Story Ad will be moderated for brand safety to avoid adjacency issues.
- *Reactive*: Snapchatters will be able to report any public Story through our in-app reporting tools. Our Trust & Safety team will review any reports and decide whether to take action.
- *Reactive*: We continue to refine our ranking and ad placement technology to prevent uncomfortable juxtapositions.

Product (revenue)

Safeguards

- Ad Placement
- Brand Safety Review

content

Clover Team

document

Created

2018-10-09T16:56:41+00:00

Updated

2019-12-19T04:32:05+00:00

Link

<https://snapchat.quip.com/otcmA0VeyAli>

Shared folders

—

Expanded users

Althea Tupper, [REDACTED], David Lue, [REDACTED]

—

Users

Althea Tupper, [REDACTED], David Lue, [REDACTED]

Urls

<https://snap.highspot.com/items/5b7db3e4127958441cbaa126>

Chat

- Althea Tupper AT

[REDACTED] add the matrix

10/10/2018, 4:26 PM UTC

David Lue, when an Advertiser selects the targeted users, is this linked to the SLC?

10/10/2018, 5:59 PM UTC

Edits

Althea Tupper edited at 2019-02-25T21:22:43.791Z

- Sheet10 updated
- Sheet11 updated
- **GTM: 8/15/2018 5/31/2019**
- **PM: TBD [REDACTED] Platform Integrity: Althea Tupper, [REDACTED]**
- Moving forward In the future, we should link content (Discover, Suggested Popular/VIP Users) and ads served to each Snapchatter based on their historical preferences will be more closely linked together, making a better user experience for all and keeping Snapchatters on the platform for a longer period of time. To do this, we need to tag more regularly and ingest more frequent signals. Accounts change all the time (e.g. Kylie moving from influencer to beauty maven), so we need to make sure that our reviewers are looking at the latest content.
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- Similar to Account and Brand Safety tagging, on the Discover Snap tab, a portion of a Publisher's Discover story will be shown to the moderator. The moderator then tags it with the relevant Snap Lifestyle Category and Snap Content Category (max of 3 each is best practice).

• **Functional requirements Requirements**

- Concept
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- tbd Do all the Monetization Tagging accounts in the Ad Targeting and Measurement tool align with what's been moderated by the Discover Team in the past 6 months? How many accounts overlap and how many do not?

• • • •

• Background: Types of Ads and Ad Placement

• Spreadsheet updates

• • • •

• Data Overview

• ~~This table must be filled out by an **engineer or engineering director two weeks before code freeze** for the target release. All answers should cover any existing and/or planned use of user data for this feature.~~

•

• ~~**If a cell asks you to "please describe" or you do not see an appropriate answer, type your response directly into the cell. For example, if you are collecting demographic data, type the exact data in the first column (e.g. "age") instead of selecting "Demographic (please describe)" — you are not limited to the drop-down choices.**~~ For more guidance about how to fill out this section, please refer to our ~~P~~this guide and the notes below.

• Spreadsheet updates

• Privacy Review

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• Spreadsheet updates

• ~~PIAs are required for high risk data processing activities. Processing of high risk data categories (e.g. biometric data and children's data) and long retention periods are indicators that a PIA may be required.~~

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• ~~LIAs are required if we rely on legitimate interest as a ground for processing and the processing does not fall within existing processing activities.~~

• • • •

• Helpful Checklists

• **Acknowledgement**

• Spreadsheet updates

• **Acknowledgement Checklist**

• Ad Review

- Does this impact the existing ad review workflows?
- Will this require manual support from ad review team, or will it be handled by automated review tools?
- If manual support is required, please notify Agatha Baldwin and Laura
- **Customer Ops**
- Business Help Center
- Does [REDACTED] have access to the Quip and any supplemental collateral necessary to create content on the Business Help Center site?
- Is this feature or product user facing?
- Will it be behind a white-list? If yes, please provide info on how to sign up for beta.
- Is this going to be available to all markets? If no, please specify which markets.
- Does internal tooling already exist for this feature?
- What tools would you use to troubleshoot, edit, or view changes made by advertisers (for example, Ghostmode to edit a spend cap)?
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- What is the expected adoption rate of this new product or feature across current advertisers? *Note, this will help us gauge potential increase in inbound emails or ad submissions for support.*
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- Is there a staging link?
- Is an Alpha testing period required?
- Has product strategy identified candidates for an alpha enrollment period?
- Link to the Alpha customer list here:
- Is a GTM plan required?
- Has product strategy finished the GTM plan?
- Link to the GTM plan here:
- Is external communication required?
- Does Product Strategy and Product Marketing have approved copy to distribute in conjunction with launch?

• **Product Specific Review**

• ~~Please only answer the questions that are specific to your feature~~

- Spreadsheet updates

-
-
-

Althea Tupper edited at 2019-02-25T18:20:09.974Z

- Spreadsheet updates
- Spreadsheet updates
- Spreadsheet updates
- Spreadsheet updates
- Spreadsheet updates
- Spreadsheet updates

- Discover Feed and Ads Targeting (including Moving Monetization Content Tagging to Snapgraph)

- **Monetization**
- **JIRA: TBD**
- **GTM: 8/15/2018**
- **PM: TBD**
- . . .

- **Context**
- **Goals**

• ~~**Issue:** We need to tag more regularly and ingest more frequent signals. Accounts change all the time (e.g. Kylie moving from influencer to beauty maven), so we need to make sure that our reviewers are looking at the latest content.~~

• Our goal is to make sure that Moving forward, we should link content and ads are targeted served to each user Snapchatter based on their historical preferences, making a better user experience for all and keeping Snapchatters on the platform for a longer period of time. To do this, we need to tag more regularly and ingest more frequent signals. Accounts change all the time (e.g. Kylie moving from influencer to beauty maven), so we need to make sure that our reviewers are looking at the latest content.

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- Supporting Documentation
- Existing Flow
- tbd
- Suggested Recommendations
- **Functional requirements**
- ~~The above solution solves showing Ads on the back of user-generated content, but not Discover.~~

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- **Tooling**
- **Events to Track**

- tbd
- Open Issues or Questions
- tbd
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- **Product Specific Review**
- *Please only answer the questions that are specific to your feature*

Althea Tupper edited at 2018-11-07T15:51:08.830Z

- Suggested Recommendations
- **Issue:** We need to tag more regularly and ingest more frequent signals. Accounts change all the time (e.g. Kylie moving from influencer to beauty maven), so we need to make sure that our reviewers are looking at the latest content.
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- The above solution solves showing Ads on the back of user-generated content, but not Discover.

Althea Tupper edited at 2018-10-24T13:47:48.431Z

- Spreadsheet updates
- Risks
- There is certain content that we have a higher risk showing ads around. There are two scenarios that could occur:
 - Showing ads as a tile within Discover next to a particular sensitive account or piece of publisher content
 - Showing ads within publisher content that is sensitive
 - Showing ads interstitially between accounts
- Real Life Risk Scenarios
- InfoWars
- Knifebox
- Hypothetical — Women's Rights / Birth Control Ad and Kavanaugh Content Story
- **Tooling**
- Current tooling for the Monetization Tagging team is in a custom tool that was created without a Quip outlining design decisions.
- Image
- Image
- Image

Althea Tupper edited at 2018-10-10T16:02:42.560Z

- Our goal is to make sure that content and ads are targeted to each user based on their historical preferences, making a better user experience for all and keeping Snapchatters on the platform for a longer period of time.

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- ~~Revenue / Ad Monetization~~
- Ad Review Departments Involved in Brand Safety for Discover Content
- Ad Review & Integrity
 - *Ads Targeting*
 - Targeted Geofences
 - IP Targeting
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- Product (revenue)
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- Ad Placement
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- content
- Clover Team

Althea Tupper edited at 2018-10-09T16:56:43.556Z

- Discover Feed and Ads Targeting
- Types of Ads and Ad Placement
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- Ad Placement
- There are several different places where Ads can be placed on Snapchat.
- *Content Interstitial Ads*: Ads that appear between content streams, and puts two pieces of content together (e.g. between "For You" content, Publisher content)
- *Discover Ads*: Ads within a Discover Snap Publisher story
- *Top-level Story Ads*: Ads that appear in the Discover Feed as tiles
- Revenue / Ad Monetization
- Ad Review
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