

AMENDED Exhibit 1156

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

From: Peter Sellis [REDACTED]
Sent: 3/29/2017 3:02:14 PM
To: [REDACTED]
CC: [REDACTED]
Subject: Re: [REDACTED]

Got it.

(1) I might then take the angle of Official Stories monetization: basically that in its current state, we are driving ads into a losing proposition: we already monetize around official stories, so the economic incentive is actually pretty limited, and they are kind of a foundering product. For them to make sense from a monetization standpoint, we need to be able to make them discoverable.

(2) Additionally, the current DAU % of Discover continues to be limiting from an advertising perspective. We've got some ways to help but we are going to hit the limit of Discover monetization very soon. (I can go into this more deeply very easily). The key to monetization will be scale. While we build up these premium products like shows, at the end of the day they will be a drop in the bucket compared to scalable audience consuming third party content.

(3) We do want to commit to a premium content monetization strategy, because we believe we can get 3x CPMs for stuff that is aligned with reserved content versus bidded audience. And we have some stuff we are pushing forward there.

-ps

On Wed, Mar 29, 2017 at 9:53 AM, [REDACTED] wrote:

I think if you pitch it that you can lend resources to help make it happen smoother and quicker but still let [REDACTED] own the business decisions around it, I think he'd be amenable. He doesn't like when other teams design and build products that impact Content, Content partners, etc. without his guidance because he owns the result but didn't get to drive the process, but he does like when shit gets done and done well, and as far as I know your rep is pretty clear that you get shit done and done right.

On Wed, Mar 29, 2017 at 9:46 AM, Peter Sellis [REDACTED] > wrote:

Got it – thanks guys. So should my pitch be, "We can help drive this?" or should it be "We can lend you some resources?" or should it be "WHY HASN'T THIS HAPPENED SOONER?"

--ps

On Wed, Mar 29, 2017 at 9:24 AM, [REDACTED] wrote:

On the experimental stories....what has been killed is what had been called internally "Conceptual Stories." These were all the Stories that were based on a theme rather than on a specific event that was happening at a place and time. This included everything from "Pizza Day" to "Kevin Hart Truth or Dare" to "10-second talents." So we never did a true running feed, it was all on a theme, but that said, it was clear that Our Stories needed to go back to being about tentpole events.

Other than that I don't think you'd actually find that much pushback on this stuff. It would have to be a bit separate from the umbrella of "Our Stories" probably, but otherwise it might have potential. The biggest challenges right now probably to creating that content is 1) actually getting that content submitted and 2) automatically combing through all the Snaps to identify the best content to surface. The first problem is likely solved if we start publishing this stuff because people learn what to submit and want to make it on

Snapchat, and if we are allowed to take Snaps from public stories that aren't submitted to Our Story that would obviously open it up more. The second problem is still a decent size one as the automatic curation has not done a good job at all of finding good quality/entertaining Snaps, just finding groups of similar Snaps. Not that it isn't possible, but I haven't seen it done well yet.

And on treating good Stories from Popular Accounts more like content that we could choose to surface people that didn't yet opt in....I think [REDACTED] is on board with that.

On Tue, Mar 28, 2017 at 2:26 PM, [REDACTED] [REDACTED] [REDACTED] > wrote:
[REDACTED] for his POV

Peter, on the DL Discover page is going away in Q1-18.

Apparently we pitched experimental stories (non-linear narratives) and Evan killed it, so we need to be careful how we pitch surfacing content.

[REDACTED], any other guidance for Peter's chat with [REDACTED]?

On Tue, Mar 28, 2017 at 9:47 AM [REDACTED] [REDACTED] [REDACTED] > wrote:
Argument Flow:

1. Let's start by acknowledging two challenges we've laid out for ourselves:

1. Snap Ads in User Stories sucks from a user experience, and the view durations are awful. In comparison, Discover view durations are much better - because people are more in the mood to browse and kill time than communicate. Evan is aware Snap Ads in User Stories sucks and vowed to fix it.

2. Evan proclaimed our mission is to increase engagement (time spent) in the app.

2. If we want to create enough inventory in Discover to kill Snap Ads in User Stories, *and* if we want to increase time spent in our app, Discover is the silver bullet. We could surface the best Snaps and Stories from Popular Accounts, and even from any Public or Live Submitted Snap - inside Discover. This isn't about copying Instagram's Explore page - it's about telling stories on Snap in all the ways stories can be told. Our definition of a "Live Story" right now is great, but limited. Memes are stories - and stories can be told in a single snap. Let's surface this content and allow people to browse through the best stories from around the world every day.

3. **Why will this increase time spent?** Habits are built in times of boredom. Instagram LIVES in this domain. People spend hours a week watching video and meme after video and meme. We have as much good content on our platform - why not offer that to our users? What if we set out a goal to double our daily time spent by end of year?

4. **Why will this increase monetization?** More time spent -> more dollars.

Desired Result:

1. Now: Build a roadmap to surface more *and more relevant* content via Discover

2. Q2: Start with surfacing recommended popular accounts

3. Q3: Start surfacing popular memes and snaps

4. Step 4: ????

5. Step 5: Profit