

AMENDED Exhibit 1158

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

Voice of the Customer: Spotlight

Date Range: 11/20 - 11/23 (~9:00PM PST)

App Versions: 11.5 & 11.6

Source: In-Settings, External S2R

By Emily A. Hoang

Summary**Highlights:**

Feedback continues to ramp up and diversify!

- We received our first handful of reports concerning the *Incentive Program*
- We are starting to receive a higher percentage of potential bug/technical focused reports
- More Snapchatters have started to highlight they are unable to find or are missing Discover Shows and “Happening Now.”
- A large majority of feedback continues to center on negative feedback comparing Spotlight to TikTok, Instagram Reels etc.
- A trend in feature requests specific to Spotlight has emerged! Snapchatters want a comment section on individual Spotlights

Support Site Contact Us Flow for Spotlight Launched!

We’ve launched the Spotlight sections in our Contact Us flow for our Support Site! Find by navigating to *My Snapchat Isn’t Working > Spotlight* or *I have Feedback > I Have a Suggestion / Question > Spotlight*. Ready below to see the first insights gathered from this new contact flow.

Rollout Period Covered:

- Incentive Program announced today 11/23!

11/20	◆ Add: US, GB, FR, DE, NO, DK, SE 20% on both iOS and Android	64M (64%)	25M (64%)
11/20	◆ Add: US, GB, FR, DE, NO, DK, SE 20% on both iOS and Android	82M (82%)	32M (82%)
11/20	◆ Add: US, GB, FR, DE, NO, DK, SE 20% on both iOS and Android	100M (100%)	40M (100%)

Notable Snapchat Reports

We request that employees **refrain** from engaging on Twitter posts and other customer communications included in VoC reports, as these communications are handled exclusively by the Community Operations team.

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spotlight not loading	Loading	One off report, will monitor for actionable trend.
excuse you. I just got into the app 40 minutes after the update. only to find out discover was taken away, bad choice, and my gender reveal video was posted. I didn't post it. I did not give Snapchat permission to post my videos.	Posting to Spotlight	One off report, but escalated due to potential privacy implication: STORIES-27159: [High] - Android customer reports Snap was posted to Spotlight without their consent
so in the spotlight story thingy no one looked at it but when I was at my friends she looked at it but I can't see it I dont know why	Spotlight Views	One off report, will monitor for actionable trend. Could be a delay in refreshing view count.

Feedback

Feedback continues to center around copying other platforms with more Snapchatters highlighting missing previous Discover content / not knowing how to find it.

Negative Feedback

Most negative feedback centered “copying TikTok” and disliking how content is found.

- “Remove it. I would like to know why every single app has to be the same. No one likes instagrams reels so why bring up snapchat spotlight. I don't wanna see other peoples snapchats I wanna my friends and their stories. It's annoying”
- “The change to spotlight is a downgrade from how it was previously. I liked the news articles and the old layout better.”
- “this is even worse than the discover updaye you made. if this is imemebted i will delete snapchat and just watch my favorite shows on youtube. you completley ruined my experience and enjoyment in discovering topics with your app. I have been a beta user when you first launched your social platform in the early 2010s. And I no longer want to use it.

Stop chaning your platform without surveying your users. Bring back a way for me to be able to discover topics based on interest. the spotlight feature is random at best and if you mistakbely click or touch somethibg on your phonenit can dissappear, hiding ans curating content is impossible. I am really disappointed in the app.”

- “I feel like you should remove the spotlight feature. It is like TikTok just less user friendly. It kinda just feels trashy and like a money grab move to profit off of TikToks success.”
- “My suggestion to make the app better is to take off “Spotlight” and to change the icon back whenever we record a video. A lot of my friends and their friends complained about this update, and i see why now. The spotlight is creepy, and the recording icon is weird.”

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Missing Shows / Happening Now

Most negative feedback centered “copying TikTok” and disliking how content is found.

- *“can we not see what we were currently watching anymore,the stories episodes”*
- *“Can you get rid of spotlight and bring back the stories? How am I supposed to find the channel I like when it's random what story I can watch? please bring back the story channels section.”*
- *“Please help me remove spotlight from my snapchat, I hate it and I want the news back.”*
- *“Bring back the “Happening Now” feature I really found it useful for all the news stories I was interested in. I don’t need to see stupid kids dancing and doing dumb things! If I wanted that I would download TikTok. But I’m not going to do that because I think it’s a stupid app!”*

Disliking Content / Concern on Age Limit

Feedback centers on not liking content presented and in one case being concerned about the ages of people featured on content.

- *“In the Spotlight brief it stated 18+ shouldn’t be served users content under 18 but I’m regularly seeing -18 users.”*
- *“Hi, I'm Marvin 21 Would like to work for you to better control the content posted via Spotlight, Regards Marvin”*
- *“I dont like being forced to see spotlights, all I'm seeing is half dressed females twerking and dancing it's not relevant for me. I rather choose what I want to see!! “*

Incentive Program

Most negative feedback centered “copying TikTok” and disliking how content is found.

- *“the million dollars per day is a good start but it'll fizzle very quickly. money is one way of getting people to use an app (see hq trivia which ultimately died because it became irrelevant).*
- *“So I just saw the new spotlight feature and had some comments to make about the new reveal. First off I really like that you guys are making a creative platform for people wanting to pursue content creation, as someone who has grown up with YouTube content creation being my main source of entertainment, I love to see when new platforms open up (much like Vine, TikTok, etc). The only issue that I have is that the cash incentive is very front and center. Having money go to creators who put out good content is a fantastic idea, but I fear that the cash incentive will breed content that is made with the sole intent to grind out money. The best content and creativity doesn't come from people who want to make money, it comes from people who want to share their thoughts and put their creations into the world. I know that is just my opinion and im probably biased because of the shift in content creation that happened when people started finding out that you could make money on YouTube, but I just think the focus should just be more in line with the creators themselves than what the creators can get out of it. (TLDR: the cash incentive snapchat has put in the spotlight of the new spotlight feature will most likely, in my opinion, churn out more quantity over quality content on your platform.)”*

Feature Requests

Adding a comment section has emerged as the top feature request for Spotlight!

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- Comment Section

- *"On the Snapchat Spotlight there should be a comment section. It would be a cool way to communicate with content creators that don't have you added."*
- *"if you want to compete with tiktok, a comment section usually provides 80% of a viewers entertainment on tiktok. add a comment section if you want this feature to succeed"*
- *"ADD COMMENTS TO SPOTLIGHT AND ILL LOVE YOU, also make it able to see how many people like the posts, keep doing all this n I literally won't use Instagram or TikTok anymore "*

- Other Interesting Feature Requests

- *"Mark Snapchatter so that you can add them if necessary"*
- *"You should give the option to hide all because no matter how many times I select hide that channel more keep popping up I say there for 2 hours one day and it was for nothing"*
- *"I think if you have to keep the spotlight feature then you should be able to hide the videos you don't want to see or choose the type of videos you want to see"*

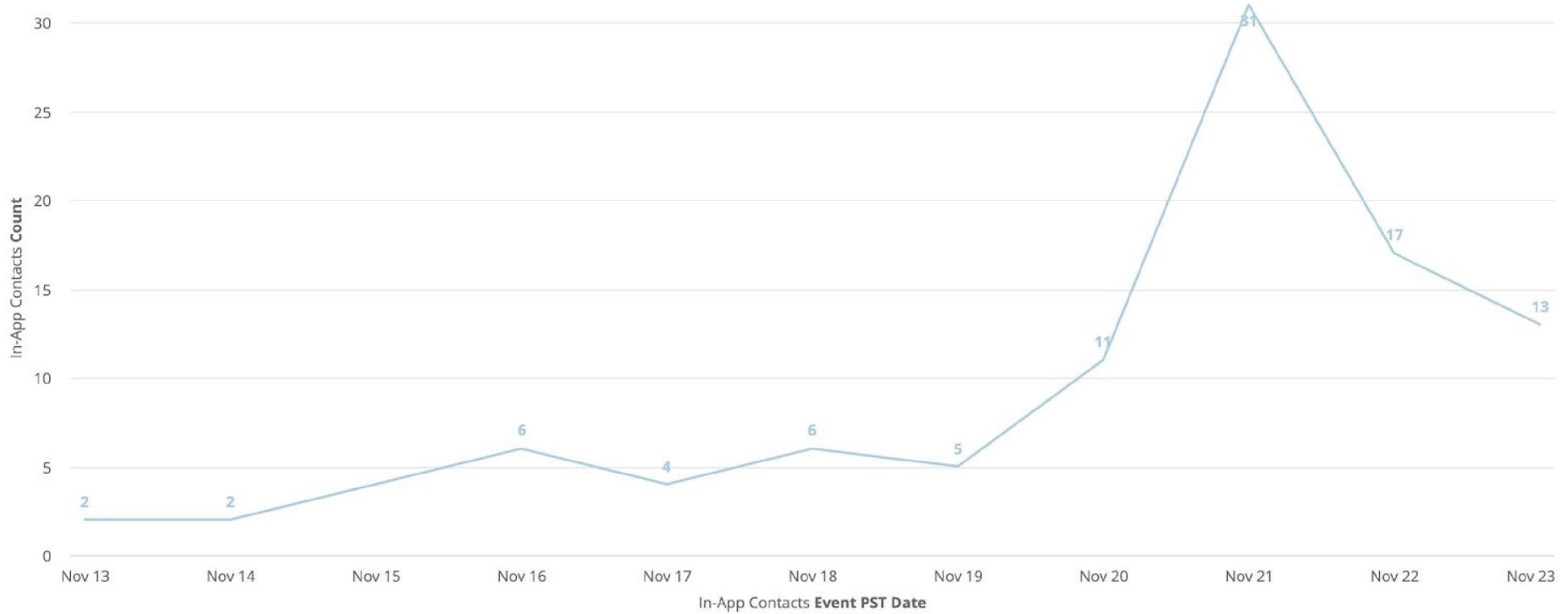
iOS S2R & In-Settings Feedback | 185 Reports Analyzed

[Looker - iOS Customer Reports Filtered for "Spotlight" user selected feature](#)

[Spotlight iOS Reports Day over Day](#)

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Spotlight Android Reports Day over Day**Spotlight Android Report Breakdown**

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1	Other Snapchat Feature	29
2	Negative Feedback	19
3	Indiscernible	7
4	Feature Request	5
5	Missing Shows / Subscriptions	4
6	Playback Issues	3
7	Spotlight Views	1
8	Too Many Ads	1
9	Dislike Content	1
10	Potential Bug	1
11	Crashing	1
12	Update Confusion	1
13	Incentive Program	1

Support Site - Spotlight Contact Us Flow | 9 Reports Analyzed

[Looker - Customer Reports from Contact Us flow for "Spotlight"](#)

[Spotlight Contact Us Flow Day over Day](#)

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1	Potential bug	3
2	Other Snapchat Feature	2
3	Update Confusion	1
4	Potential Bug	1
5	Incentive Program	1
6	Positive Feedback	1

Social Listening

Highlights pertaining to Spotlight from Twitter! Thanks to [REDACTED] for these insights!

Highlights:

- Tons of responses to the Launch articles with mixed sentiment:
 - Users are excited that Snap introduced this feature, some saying that the content is very addicting
 - Most users are calling out that all social media platforms are copying each other
 - Some give vague feedback saying, Spotlight is good but needs some work
 - A lot of users are excited and happy about this new feature
 - Some call out that Spotlight content is just reused content from other platforms
 - A lot of users posting example videos of using Spotlight
- Incentive Program:
 - Users saying we are Tiktok with money
 - Most say that this incentive program is a good idea especially for content creators
- Product Feedback:
 - High follower count user (Perez Hilton): Snap's interface is confusing compared to tiktok
 - Users not liking the placement of the Spotlight tab in the corner and saying the content is low quality
 - General confusion about a "like" button
- Public Profiles:
 - Low volume, most users just want to know when they can receive a public profile
- Competitor Comparison

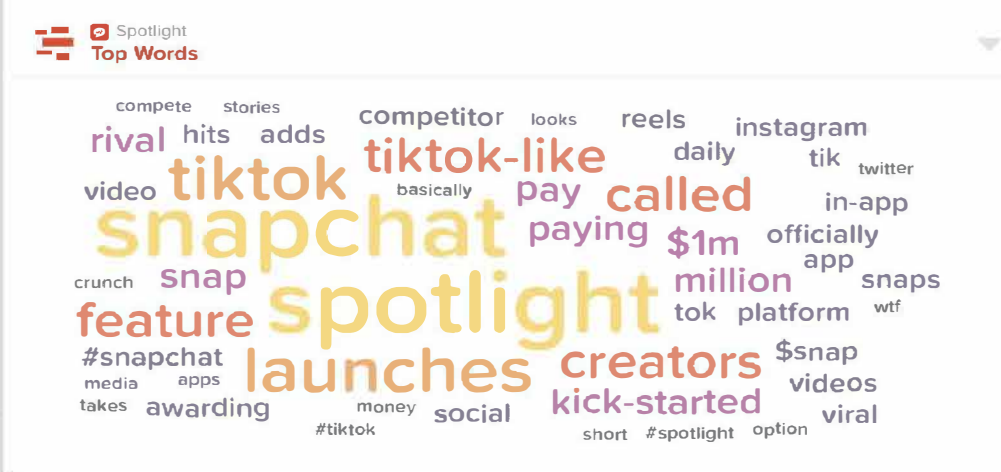
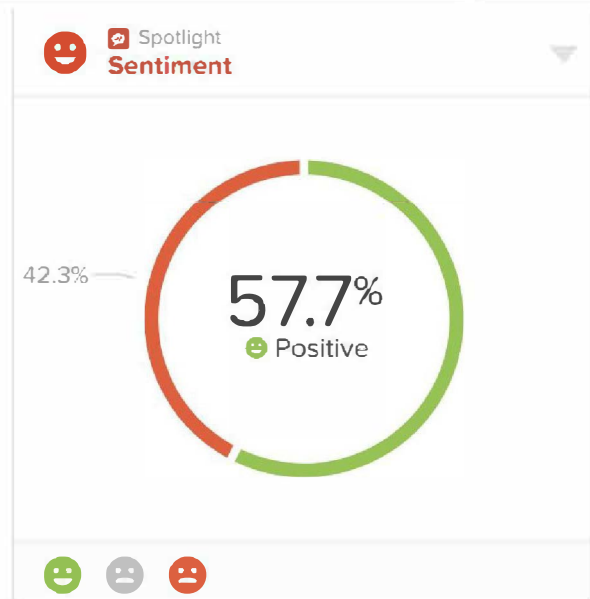
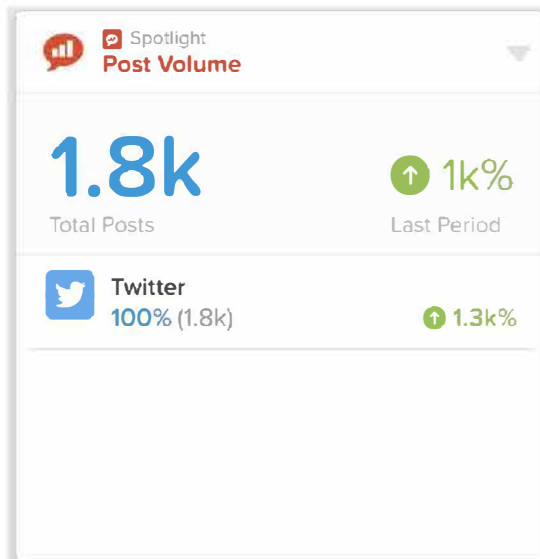
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- A lot of of chatter about all platforms copying each other, mainly Tiktok; however, some were quick to say that Spotlight is different
- Email feedback from Support Site Contact Us Form
 - *“Please tell me how to turn off spotlight I hate it and I dont want to see it. Theres a reason I dont have tiktok installed it's because I dont want to see this type of content it was much better when I could see helpful things like nes articles. Where are they? And how do I access that again?”*
 - *“How come I cant find any information on using spotlight favorites? I cant find any direction on what it is or how it's used..”*

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Tweets

Incentive Program

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AP
@simplyangie7

So tiktok but with incentive 🍀



Snapchat @Snapchat · 5h

Introducing Spotlight 🔑



Cream Life Clothing
@creamlifeco

Snapchat got money like that



Complex @Complex · 2h

Snapchat is giving away \$1 million a day through the end of 2020 with their new 'Spotlight' feature. bit.ly/2Ht1UsR

8:46 AM · Nov 23, 2020 · Twitter for iPhone



ChloeTongueBCU
@BcuChloe

As this point every social media platform is a mix of every social media platform. You got Twitter with stories now, Snapchat just introduced "spotlight" which is basically like Tiktok with a bribe of money involved 😂

9:29 AM · Nov 23, 2020 · Twitter for Android

1 Retweet 3 Likes



anjali
@anjalipanchaa

so you're telling me i can earn money with snapchat spotlight

9:40 AM · Nov 23, 2020 · Twitter for iPhone



THEBANKER @AjeirC

Not a bad incentive



Complex @Complex · 2h

Snapchat is giving away \$1 million a day through the end of 2020 with their new 'Spotlight' feature. bit.ly/2Ht1UsR

8:56 AM · Nov 23, 2020 · Twitter for iPhone



Sarah Frier @sarahfrier

Snapchat wants creators to be able to make money on its app without being influencers/working with brands on sponsored content. They're giving away \$1m a day to the top videos in a new feature called Spotlight:

General Sentiment / Excitement

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Product Feedback / Suggestions



Perez

@ThePerezHilton

Replying to @TaylorLorenz

The main problem with Snapchat, though, is that they don't have an easy to navigate interface. It's confusing. Not as simple as TikTok. That's a big reason why it's not even bigger. And they should fix that.

12:15 PM · Nov 23, 2020 · Twitter for iPhone



Ells

@elliecmpbell

How annoying is that spotlight thing in the corner on Snapchat

10:12 AM · Nov 23, 2020 · Twitter for iPhone



Jean-Sébastien Wallez

@jswallez

Just tried @Snapchat new Spotlight feature. Still feels very beta.

- 1/ no special Snap content
- 2/ doesn't feel "social", watching a creator alone is boring
- 3/ the lower quality videos quickly triggers fatigue

p.s. did I see a like button? 🙄 please make it more fun!

9:49 AM · Nov 22, 2020 · Twitter for iPhone



Q

@Quineshaaa_

I'm so tired of pressing spotlight on Snapchat when I'm tryna post my story 🙄

11:40 AM · Nov 22, 2020 · Twitter for iPhone

2 Likes



Holl

@hollyloganxo

The amount of times I've pressed on the spotlight part of Snapchat and some stranger pops up on my phone, can't stand it

1:11 PM · Nov 22, 2020 · Twitter for iPhone



@sznsfenty · Nov 21

nvm just seen it wth. this is not tiktok/reels



Positive Feedback

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Darren Culbreath
@darrenculbreath

#Snapchat Spotlight tries paying users to steal
#TikTok influencers #SlashGear @slashgear



Rocie
@RosieRaww

Yo the spot light option on snap keep pissing me off

2:17 PM · Nov 22, 2020 · Twitter for iPhone



Chloe Devine
@chloedevine05

@Snapchat wtf is this new update like why are you
trying to channel tiktok with this stupid spotlight
thing. I don't want to see random people's stories of
them wishing someone a happy birthday or showing
off their Indian takeaway like what the hell is this.
#snapchat #wtf #why

5:12 PM · Nov 22, 2020 · Twitter for iPhone

Competitor Comparison

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Jace White
@_JaceWhite_

Everyone's talking about Twitter stealing the story idea from Instagram but no one realized Snapchat stole TikToks idea for its "Spotlight"

12:31 PM · Nov 20, 2020 · Twitter for iPhone

4 Likes



#ENDSARSNOW
@missprezzy09

Snapchat basically has its own tiktok now called spotlight wth..... 🧠💔

10:39 PM · Nov 20, 2020 · Twitter for iPhone



@LilEnayaa

Snapchat spotlight like Instagram reels? Zero creativity

8:30 AM · Nov 21, 2020 · Twitter for iPhone



nina
@ninafern

The snapchat spotlight feature is literally tik tok. When are social medias gonna stop stealing others concepts

9:39 AM · Nov 21, 2020 · Twitter for iPhone



Abby Ellingson
@EllingsonAbby

So Instagram adds reels and now snap chat adds spotlight. @Twitter I want an edit button don't think about adding any thing else until we get an edit tweet thing

2:10 PM · Nov 21, 2020 · Twitter for iPhone



blactivist
@chloejayyb

that stupid spotlight feature on snapchat is really giving tik tok and Instagram reel vibes, can these apps stop copying each other omg

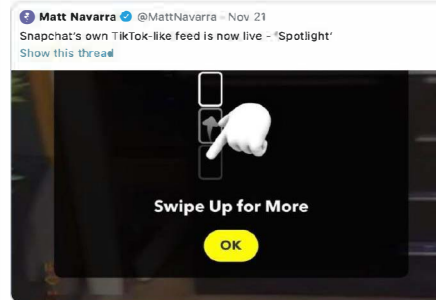
2:54 PM · Nov 21, 2020 · Twitter for iPhone

4 Likes



Courtney Mellanby
@court_mell

Sometimes I miss the days when all the social platforms served different purposes and didn't copy each other every 3 months



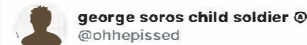
7:45 AM · Nov 22, 2020 · Twitter for iPhone



maria
@cluelessartiste

@instagram @Snapchat please stop being like tiktok, no one wants reels, and no one wants spotlight. Please just stick to the thing that made you popular and fix errors within that. Thanks 🙏🙏

6:48 PM · Nov 21, 2020 · Twitter for Android



george soros child soldier
@ohhepissed

snapchat has spotlight aka tik tok now?

[Translate Tweet](#)

12:22 PM · Nov 22, 2020 · Twitter for iPhone

Please provide any feedback so we can continue to improve!

- What was most helpful from this report?
- What would you like to see in this report that is missing?
- What information is in this report that is unnecessary?

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