

AMENDED Exhibit 1159

**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: [REDACTED]
Sent: 1/18/2021 9:00:59 AM
To: undisclosed-recipients:
BCC: [REDACTED]
[REDACTED]

Snap Inc. News Clips
January 18, 2021

Snap Coverage

[**Snapchat jackpot: Los Angeles influencer, 19, makes \\$3million in two months by uploading viral clips to Snap's new Spotlight campaign as it pays huge bonuses to compete with TikTok**](#)

Daily Mail (UK)

Continuing coverage: [Business Insider](#), [Dexerto](#), [Gizmodo](#), [Markets Insider](#), [Mic](#), [MSN](#), [Pedestrian](#), [Tubefilter](#), [Yahoo! News](#) (CA), [Tech Register](#) (UK), [The Sun](#) (UK), [News24](#) (FR)

[**Snap Promotes Ben Schwerin to Head of Content and Partnerships**](#)

Variety

Continuing coverage: [dot.LA](#), [Tubefilter](#)

[**Anime Makeovers, Mandalorian Helmets, Twerking Muppets & More on Snapchat**](#)

Next Reality

[**Snapchat profits from TikTok ban, eyes Originals and partnerships to monetise Indian user base**](#)

Economic Times (IN)

[**Research: Snapchat Users Relieved to Leave 2020**](#)

Skygrid (ID)

Additional coverage: [Lowyat](#) (MY)

[**Snapchat, Instagram, Twitter and now LinkedIn and Spotify: the story of the Stories, the most loved function on social networks**](#)

Business Insider (IT)

[**Snapchat has added a new feature on its spotlight clips, where you can see the total number of public views just like TikTok**](#)

Digital Information World

Continuing coverage: [Web Marketing](#) (FR)

[**#NoHashtag, TikTok Flashback and New Features on Snapchat**](#) [Partner Solutions Program]

Adformatie (NL)

[**Celebrate Pongal, Lohri and Makarsankranti with new AR lenses from Snapchat**](#)

Hot News Express (IN)

Continuing coverage: [Tej Gujarati](#)

Industry Coverage

[**Behind a Secret Deal Between Google and Facebook**](#)

The New York Times

[**Biden eyes ex-Obama staff to tackle Big Tech and other antitrust issues**](#)

GitHub admits 'significant mistakes were made' in firing of Jewish employee

The Verge

Full Snap Stories**Snapchat jackpot: Los Angeles influencer, 19, makes \$3million in two months by uploading viral clips to Snap's new Spotlight campaign as it pays huge bonuses to compete with TikTok**

Daily Mail (UK) - Ariel Zilber - January 15, 2021

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- Thousands of influencers are getting paid by posting viral clips on Snapchat
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- To compete with TikTok, Snapchat in November unveiled its Spotlight feature
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- It invites influencers to post content on Snapchat and get paid for it
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-
- Snapchat pays out \$1million a day to influencers who create viral content
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-
- Cam Casey, 19, of Los Angeles, has earned more than \$3million on Spotlight
-
-
- His roommate, Joey Rogoff, 21, of LA, has earned more than \$1million

Snapchat is paying millions of dollars to influencers who post viral videos on its new Spotlight service, including a 19-year-old who has earned more than \$3million.

Last year, Snapchat said it would be paying \$1million a day total to several influencers who generate clicks with viral clips as part of its new Spotlight initiative aimed at taking on rival app TikTok.

While Snaps shared on private profiles are usually only seen by friends in the app, Spotlight lets users share posts publicly while still protecting their identity from strangers.

This means that content creators will have a chance to create a Snap that's widely viewed, whether they have two Snapchat friends or 2 million.

Since the launch of Spotlight, thousands of teenage influencers have earned cash by posting short-form content.

Cam Casey, 19, of Los Angeles, California, had already established himself as a presence on TikTok.

When he heard that Snapchat was launching Spotlight, he started posting old videos from his phone, including a science experiment where a Coca Cola bottle explodes, according to The New York Times.

Two weeks later, after uploading other clips, Snapchat told him that he was going to be paid hundreds of thousands of dollars.

Casey kept uploading more videos, posting as many as 120 clips per day.

He has earned more than \$3million total from the company for the viral content, according to the Times.

Another influencer, 21-year-old Joey Rogoff, has earned more than \$1million through Spotlight.

Dominic Andre, 27, of Los Angeles, has earned \$600,000 from videos that he posted to Spotlight.

TikTok stars do make money, but their checks aren't written by the platform's parent company, ByteDance.

Instead, brand names pay influencers with a massive following on TikTok to hawk their products.

Popular TikTok stars earn as much as \$200,000 per 60-second post, and could charge major brands as much as \$1million next year if current trends continue.

This means that a star like 17-year-old singer Loren Gray, from Pennsylvania, who has over 38million followers, can charge nearly \$200,000 per post.

BabyAriel, with an estimated 30million followers, could earn around \$150,000 per post, while LA-based Pomeranian dog Jiffpom would rake in \$100,000 per post.

She is known to have collaborated with EA Games on its Sims 4: Get Famous.

Still, Rogoff told the Times he thinks more TikTok stars will migrate to the more lucrative option offered by Snapchat.

'TikTok set that precedent of what kind of content people are looking for,' Rogoff said.

'Snapchat has done a really good job of recreating that in their own way, building that into their own app.

'They're the highest paying platform right now.

'Hopefully other platforms see that and will follow their lead because ultimately that's what's going to make creators the happiest.'

Casey said his exploding popularity on Snapchat and the high earnings that come with it is burnishing his Q rating among influencers in the Los Angeles area.

'I think it's already starting to help me get into that mainstream social media world with all the other mainstream creators,' Casey said.

CJ OperAmericano, 24, of Los Angeles, has been posting primarily on TikTok. But since Spotlight started, she has managed to earn more than \$100,000.

'Everyone is talking about Spotlight,' Katie Feeney, 18, of Olney, Maryland, said.

'It's definitely very well known among all TikTokers and all social media influencers.'

Feeny, a high school senior, has earned more than \$1million from Snapchat in the past two months.

In one clip, she is seen spinning on a hoverboard while appearing in several outfits.

Feeney said that the money she has earned has made her reconsider colleges that she previously ruled out due to the exorbitantly high cost.

'I think it's going to take me a while to really process it,' Feeney told the Times.

'I now have the opportunity to go to the school of my choice.

'For a lot of people Spotlight is going to change their life and it's unbelievable.'

Still, TikTok remains the dominant platform for Gen Z influencers.

'TikTok is the place to be right now, it's where all the attention is going, all the energy is going,' Casey said.

Another disadvantage for Snapchat is that competition on Spotlight is getting more intense, which means that there is less money to be earned among those in a larger pool of influencers.

'There's more competition,' said Casey.

'It's harder to get views. More people are posting.'

While Andre was being interviewed by the Times, he said: 'I just got a DM from Snapchat right now saying that I earned another \$100,000.

'I'm earning about \$100,000 a week on average.'

Casey and Rogoff are roommates who share an apartment in the Studio City section of Los Angeles.

Casey told the Times that he plans to give back some of the money he has earned on Snapchat to his family as a thank you for raising and supporting him.

'Yes, it is just making videos, but there's so much more that goes into creating what you see on camera,' he said.

'I want to use the money to put back into my videos and create a life for myself where I'm able to become one of the biggest influencers on the internet.

'I've always had very big aspirations.

'We're in a weird industry where anything can happen at any moment.'

Snap Inc, the US company behind Snapchat, said in November that it is lowering the threshold for people to be able to monetize videos – a luxury usually only afforded to influencers with millions of followers.

'Snapchatters are some of the most expressive and creative mobile storytellers in the world and Spotlight gives them an opportunity to share their creations broadly,' said Snap Inc.

'With over four billion snaps created each day, Spotlight empowers the Snapchat community to express themselves and reach a large audience in a new way.'

Usually on Snapchat, Snaps – the short video clips themselves – can only be seen by people you are friends with on the app.

Spotlight allows users to post a public Snap, while keeping the rest of their profile private.

Other users can see and share the Spotlight Snap, but no-one can reply or see the poster's profile.

Some celebrities and other influencers already have 'public' Snapchat accounts, which means that other users can search for and view their Stories.

But with Spotlight, users don't need to have a public account for their Snap to appear on Spotlight – only 'a great Snap'.

Having created a video within Snapchat, users will now see a new Spotlight option appear when choosing where to send their clip.

Snap Inc admitted that Spotlight was 'inspired by other platforms', including TikTok, but the feature is 'defined' by the Snapchat community and 'lowers the barrier to content creation'.

'Spotlight gives our community a place to share publicly, which we see them desiring by the way they post to other platforms,' the firm said.

Spotlight also 'upholds its values on privacy' – as it doesn't feature public comments and profiles are set to private by default.

By distributing cash prizes per day to anyone who makes entertaining Snaps that appear on Spotlight, the company claims to be making the app more fair and fun – and one that doesn't prioritize celebrities or public figures.

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Snap Promotes Ben Schwerin to Head of Content and Partnerships

Variety - Todd Spangler - January 15, 2021

Jared Grusd relinquishes chief strategy officer role to become adviser

In a reshuffling of Snap's content group, the Snapchat owner has promoted Ben Schwerin to the newly expanded role as SVP, content and partnerships.

And in another executive change, chief strategy officer Jared Grusd — the former HuffPost CEO who joined Snap more than two years ago — is shifting into an advisory role at the company, focused on Snapchat's long-term strategies and initiatives.

Schwerin, who joined Snap in January 2015, was previously VP of partnerships. He'll now oversee all the company's efforts related to content and partnerships globally.

Under the new structure, Schwerin's direct reports are Sean Mills, who will continue as head of original content; David Brinker, senior director of content, business and operations, who will lead media partnerships; Mike DiBenedetto, director of content strategy; and Nana Murugesan, managing director of international markets. Schwerin will continue to lead Snap's platform, games, talent and AR creator partnership teams.

Schwerin takes over the Snap content team as the company looks to expand Spotlight, its recently launched user-generated content feature that presents videos in a personalized, TikTok-like feed. Snapchatters who contribute to Spotlight are eligible to get a cut of more than \$1 million daily, and the company has already paid out more than \$1 million to several individual creators.

Snapchat is looking to hire a senior exec to head up Spotlight, who will also report to Schwerin.

In a statement provided to Variety, Snap CEO and co-founder Evan Spiegel said, "Ben has been a part of our team for six years and he has done a wonderful job building our partnerships around the world across sports, music, media and creators. Most recently, we're really excited with the growth we've seen in Snap Kit, Games, and AR."

Regarding Grusd's new role, Spiegel said, "Jared plays an invaluable role in growing our business. I'm grateful to Jared for his friendship and for the many contributions he made to Snap in his role as chief strategy officer. I look forward to his contributions in his new role as strategic advisor, where we can leverage his strategic insights as we look for opportunities to accelerate our long-term objectives."

The Snap exec changes were first reported by the Information.

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Anime Makeovers, Mandalorian Helmets, Twerking Muppets & More on Snapchat

Next Reality - Tommy Palladino - January 15, 2021

In the three years since Snapchat launched Lens Studio, developers and artists have created more than 1.5 million AR camera effects with the desktop tool.