

AMENDED Exhibit 123

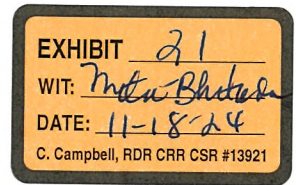
PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

DOCUMENT SLIPSHEET



Bates Number: META3047MDL-003-00095008-META3047MDL-003-00095034

BEGATTACH:

ENDATTACH:

Attachment Count: 0

PRODVOL: META3047MDL_RVOL003

Custodian: BHUTADA_SHRUTI

File Path: /FBK_OAG006-000171/FBK_OAG006-

000171/BHUTADA_SHRUTI/WSJS_0000298/20220131_ZUR-

051/WSJS_0000298/BHUTADA_SHRUTI/EMAIL/20220127_ZURICH_DOJ_3B_SHRUTI

BHUTADA_21248/20220127_ZURICH_DOJ_3B_SHRUTI BHUTADA_28.PST/TOP OF OUTLOOK DATA

FILE/INBOX/MESSAGE SUMMARY [{"OTHERUSERFBID":100022409259488,"THREADFBID":NULL}]

Confidentiality Designation: HIGHLY CONFIDENTIAL (COMPETITOR)

HASHVALUE: A29E266D27CA321F53381D4CA3499AF4

Author:

Family Date: 11/6/2019 9:42 AM

Create Date: 12/31/9999 7:00 PM

Last Modified Date: 11/6/2019 12:00 AM

LAST MODIFIED BY:

TRACK CHANGES:

COMMENTS:

HASHIDDENATA:

Filename: HLM_TOPLINE_FINAL.PDF

Title:

DOEXT: PDF

Email From:

Email To:

Email CC:

Email BCC:

Received Date: 12/31/9999 7:00 PM

Sent Date: 12/31/9999 7:00 PM

Subject:

THREADID:

REDACTION TYPE:

REDACTIONS: NO



HARD LIFE MOMENTS-MENTAL HEALTH DEEP DIVE

Shruti Bhutada and Shilpa Mody

TL;DR: HARD LIFE MOMENTS ON INSTAGRAM – MENTAL HEALTH

Across 13 mental health and well-being issues, we tried to understand the reach, intensity, impact of Instagram and degree to which users wanted us to provide support.

- 1 **Prioritization:** Social comparison stands out as a high reach, moderate intensity issue where users want support. It ranks top among the mental health issues Instagram should care about.

- 2 **Impact of IG:** Across issues, a majority of users felt that Instagram either had no impact or made things better. Over 30% of users across age cohorts felt that Instagram made problematic use worse. ~ 30% of teen girls also felt that Instagram made dissatisfaction with their body worse.

- 3 **Expectation of support:** Teens generally felt that it was important for Instagram to support people when they were having a hard time irrespective of the issue. Adults had stronger opinions re problematic use, social comparison, SSI and sadness/depression.

- 4 **Usage during distress:** Most users used Instagram to distract themselves when they were having a hard time. Most also wished Instagram had given them better control of what they saw and helped connect them with people who had had a similar experience

OBJECTIVES

We wanted to understand Instagram's role (for better or worse) in the hard experiences in peoples' lives.

How does Instagram magnify or reduce harm, pain and support during these moments? Where could we be better supporting our Instagram community? What experiences should we prioritize? We wanted to understand:

- Which hard experiences are most common and most intense among IG users?
- Which hard experiences do users want Instagram to support them with?
- Which hard experiences does IG make better? Which does it make worse?
- How do people interact with IG when they have hard experiences? What use cases do they recruit IG for?
- How do they want to be supported when they have hard experiences? Does the support they want vary by the kind of hard experience they are having?

IN ORDER TO:

- Prioritize mental health and well-being issues Instagram should focus on next
- Understand areas in which our users may need most support

HARD LIFE MOMENTS?: These do not refer to just one time instances but difficult and negative experiences that may impact well-being. We looked at 23 issues ranging from mental health to interpersonal issues and life events

WHAT WE DID

We surveyed 22,410 users across United States, Japan, Brazil, Indonesia, Turkey and India (stratified across markets) between the ages of 13 to 65+



General Reach Questions:

In the last 30 days have you experienced (6 randomly selected experiences out of 23)

Deep dive with one experience

- [Intensity] How bad did this experience make you feel?
- [Impact] What impact did using Instagram have on this experience?
- [Expectation] How important is it to you personally that Instagram tries to support people who have similar experiences?
- [Self-reported Usage] When you had this experience, did you use Instagram in any of these ways? Please select all that apply
- [Support] What do you wish Instagram could have done to better support you during this experience? Please select all that apply

ANALYSIS: We only focused on the 13 mental health issues for this report. Summary chart (at the end) includes all 23 experiences for better comparison.

HARD LIFE MOMENTS

do not refer to just one time instances but difficult and negative experiences that may impact well-being. We looked at 23 issues ranging from mental health to interpersonal issues and life events

Area	Category	Question (In the last 30 days...)
Mental Health	SSI	have you had serious thoughts of suicide or self harm?
	Body Image	have you frequently disliked the way your body looks?
	Loneliness	have you frequently felt lonely?
	Social comparison	have you frequently felt bad about yourself after comparing yourself to someone else?
	Financial stress	have you experienced frequent financial problems or worries?
	Work/school stress	have you experienced frequent stress at work or school?
	Family stress	have you experienced frequent stress from your family situation, such as from taking care of children, or parents fighting or getting divorced?
	Sadness/depression	have feelings of sadness interfered with your daily activities?
	Anxiety	have feelings of anxiety interfered with your daily activities?
	Sleep problems	have you had frequent trouble falling asleep, staying asleep, or sleeping too much?
	Problematic social media use	have you found it difficult to manage the amount of time you spend on social media?
	Eating disorders	have you felt that you have an unhealthy relationship with food?
	FOMO	have you felt anxious that you were missing out on fun or rewarding experiences?
Interpersonal	Bullying/harassment	have you felt bullied, harassed, or verbally attacked?
	Conflict	have you had a major conflict or disagreement with someone close to you?
	Discrimination	have you felt that someone was discriminating against you because of your gender, race, religion, sexual orientation, or another part of your identity?
	Authentic self-expression	have you felt like you have to hide a part of yourself from people close to you?
Life Events	Breakup	have you experienced the end of a romantic relationship, such as a breakup, separation, or divorce?
	Natural disaster	have you experienced a natural disaster, such as an earthquake or flood?
	Death	have you had someone close to you pass away?
	Illness	have you or someone close to you experienced a serious illness or injury?
	Life change	have you experienced stress as a result of a major life change, such as changing schools or jobs, starting college, or moving to a new city?

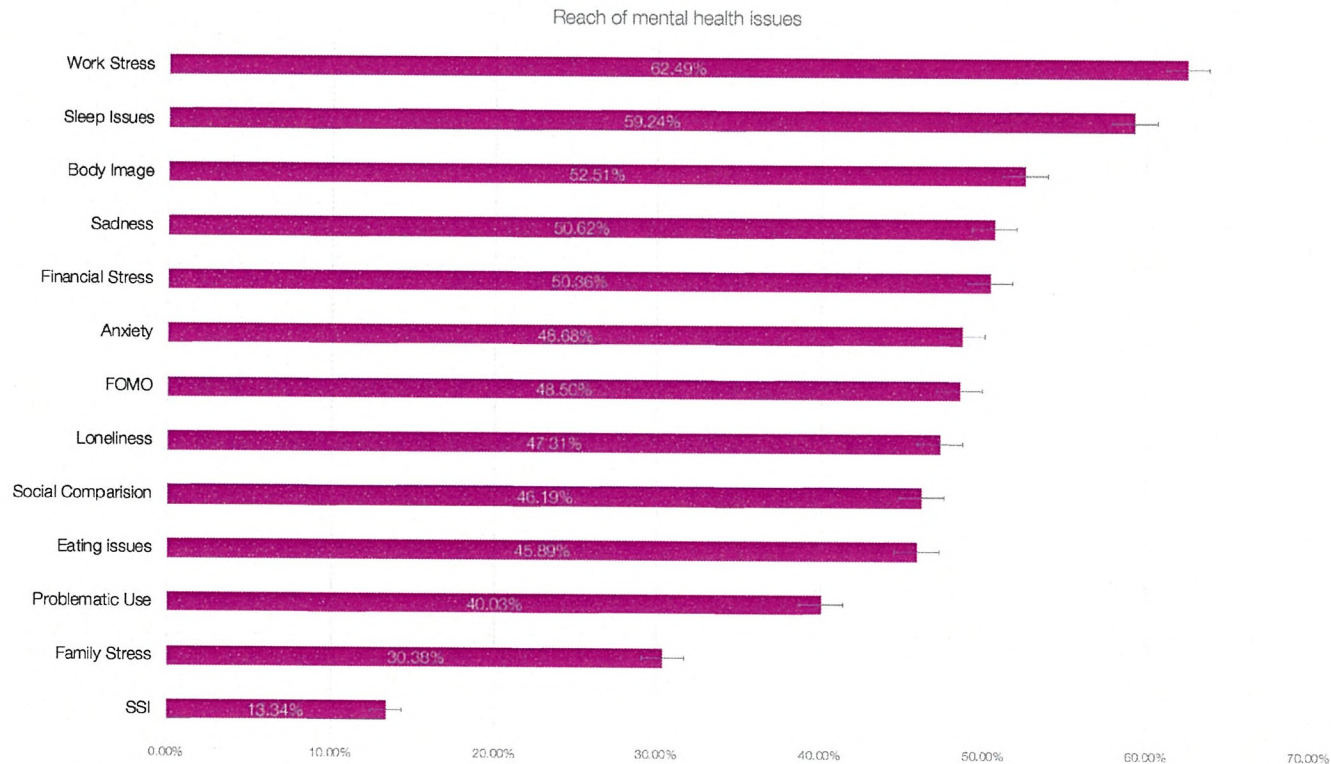


MENTAL HEALTH FINDINGS

Deep dive into the Reach, Intensity, IG Impact, Expectation, Self Reported Usage and Support of mental health issues. Overall analyses and analysis split by age when relevant

WORK/SCHOOL STRESS HAS THE HIGHEST REACH

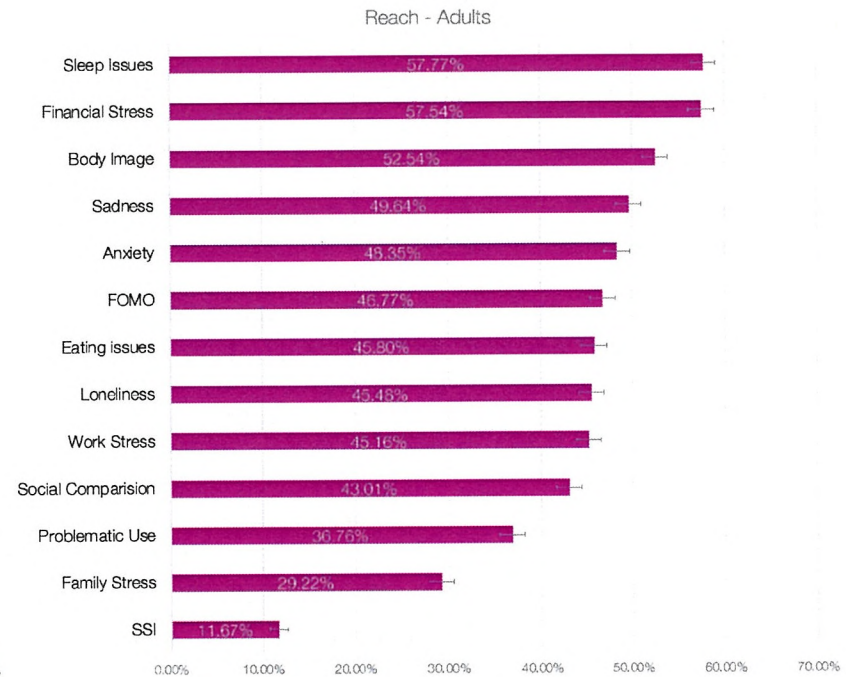
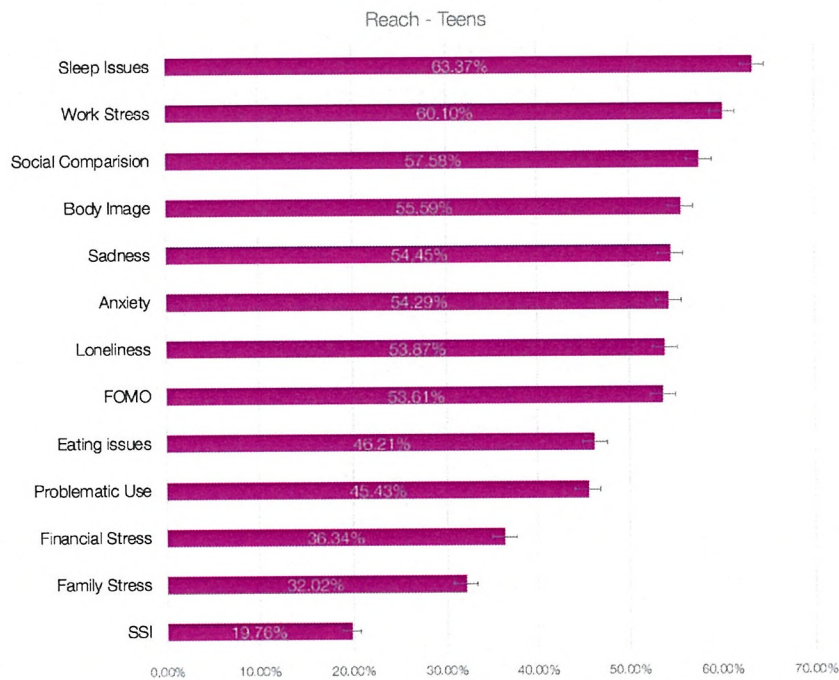
Over half of users also experienced sleep issues, body image issues, sadness and financial stress



Q: In the last 30 days have you experienced [X]
N = 22410 users across US, JP, IN, ID, BR, TR,

MOST ISSUES HAD HIGHER REACH AMONG TEENS

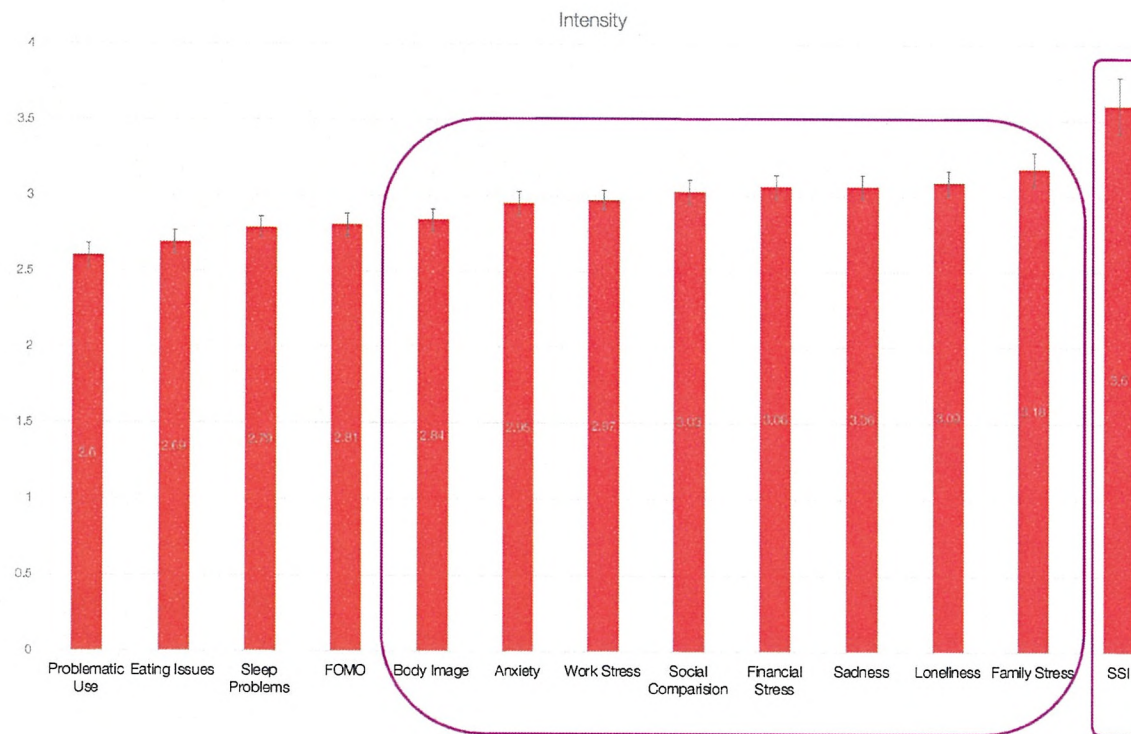
While financial and family stress which were higher for adults, social comparison and body image issues had higher reach among teens



Q: In the last 30 days have you experienced [X]
N = 22410 users across US, JP, IN, ID, BR, TR, MX

SSI WAS THE MOST INTENSE EXPERIENCE

Social Comparison, Loneliness, Stress and Depression ranked next, were similar in intensity and moderately negative



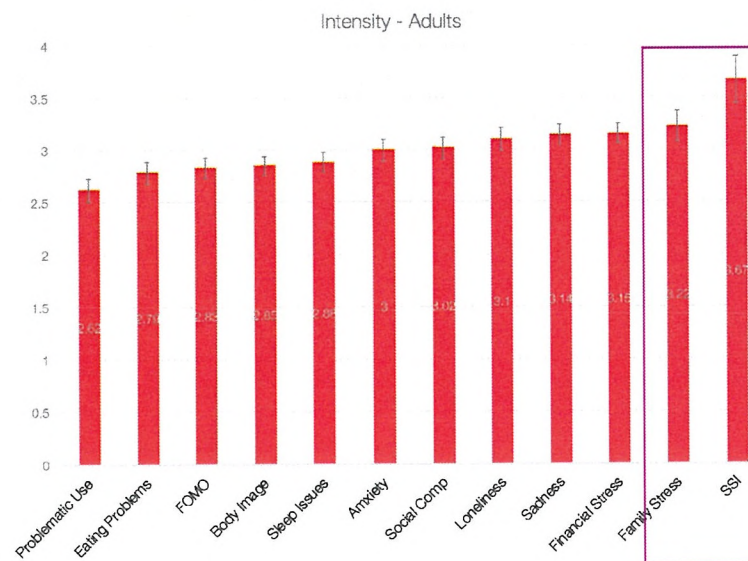
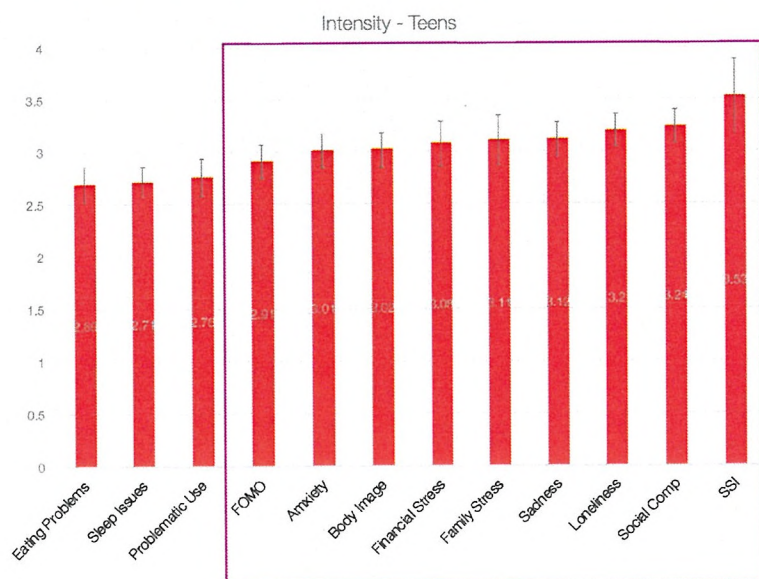
Q: How bad did this experience make you feel?

*Buckets highlight groups of issues that were not stat sig different from each other.

**Differences are statistically significant at 95% CL. No significant differences between Social Comparison, Stress, Depression and Loneliness.

SSI WAS THE MOST NEGATIVE EXPERIENCE ACROSS TEENS AND ADULTS

Social comparison and loneliness were equally intense experiences and significantly more negative than problematic use for teens and adults



Q: How bad did this experience make you feel?

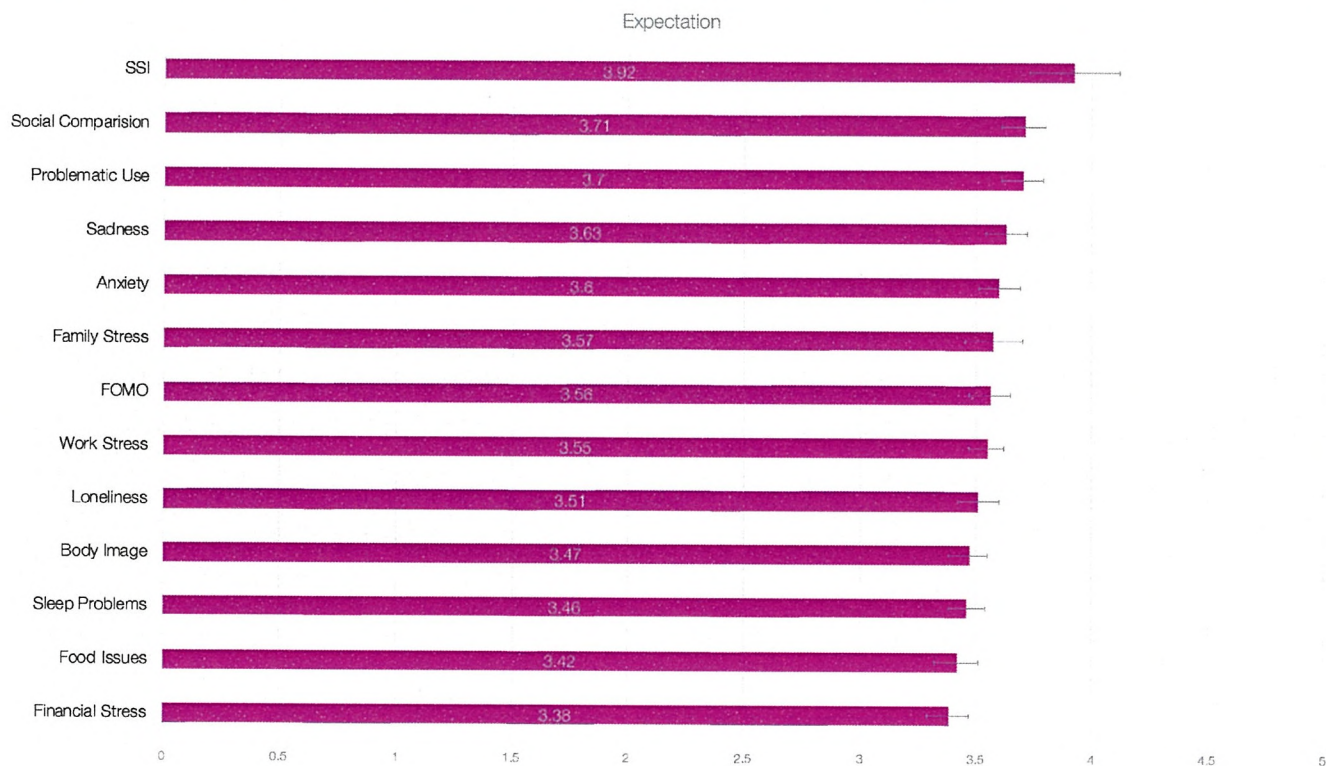
*Buckets highlight groups of issues that were not stat sig different from each other.

**Differences are statistically significant at 95% CL. No significant differences between Social Comparison, Stress, Depression and Loneliness.

10

PEOPLE EXPECT SUPPORT FROM INSTAGRAM

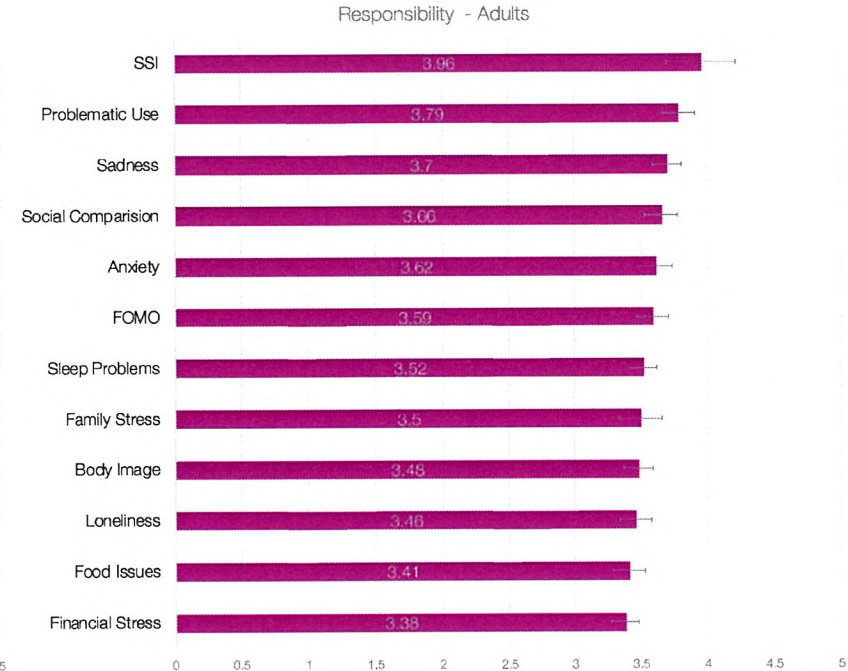
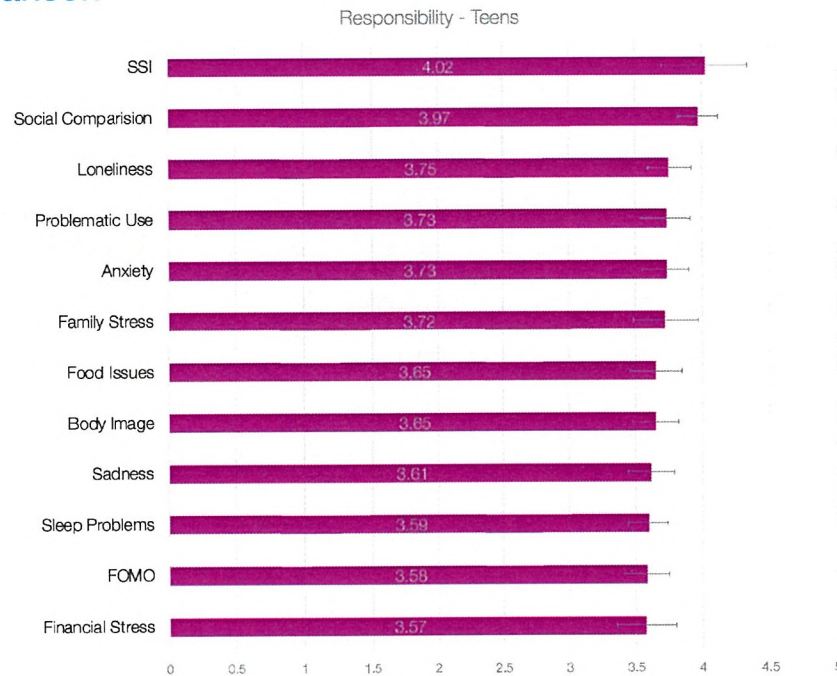
Generally people felt that it was moderately to pretty important that IG support users who were having a hard time



Q: How important is it to you that Instagram supports users who have been through a similar experience?

TEENS AND ADULTS HAD SLIGHTLY DIFFERENT EXPECTATIONS

Teens generally thought that it was somewhat important for IG to support people going through a hard time, irrespective of experience. Adults had stronger opinions about SSI, problematic use, depression and social comparison

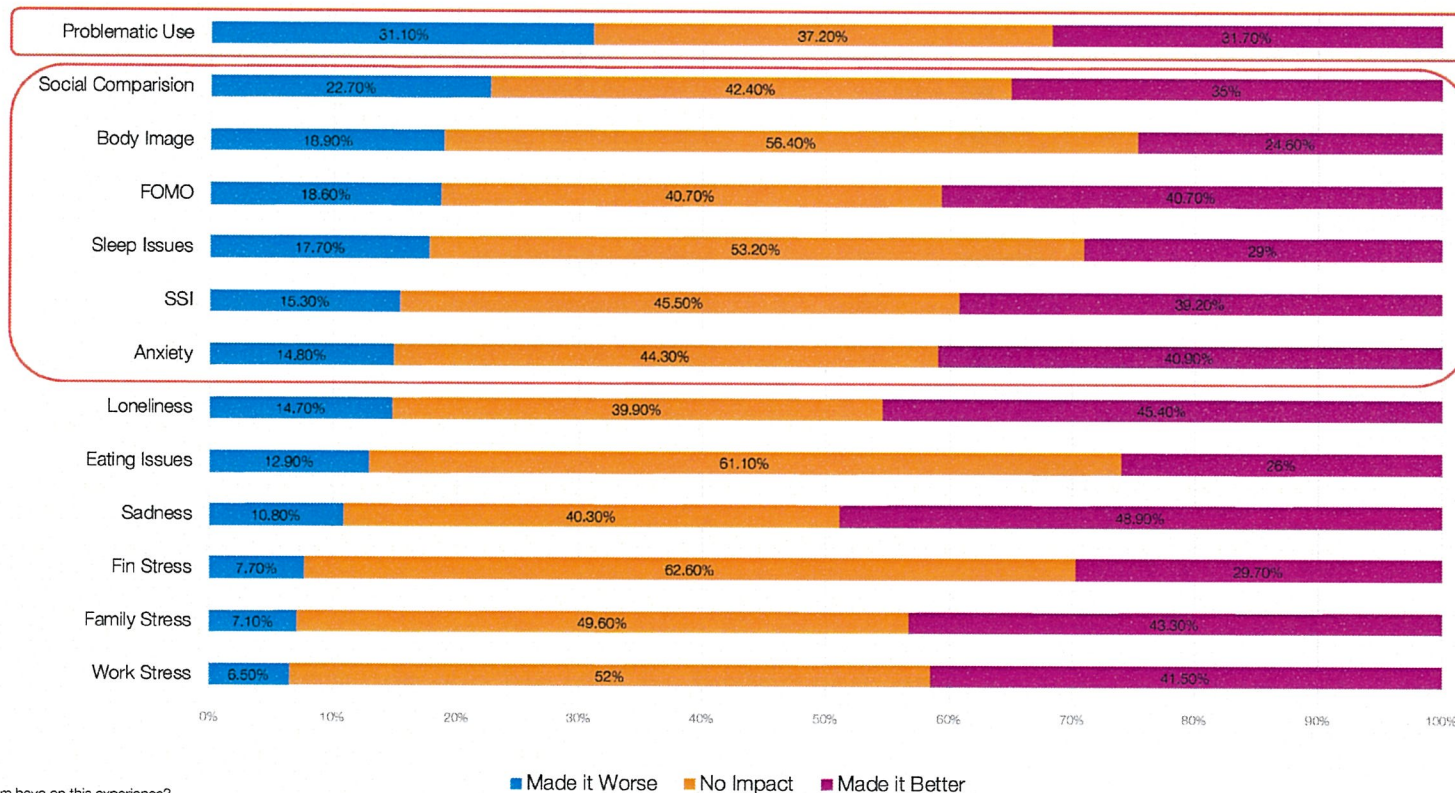


Q: How important is it to you that Instagram supports users who have been through a similar experience?
 *Differences are not stat sig for teens

12

INSTAGRAM IS MORE LIKELY TO MAKE THINGS BETTER THAN WORSE

Generally users thought that IG made things better or had no impact. However, they were more likely to think that IG made problematic use worse, followed by social comparison, body image, FOMO, sleep issues, SSI and anxiety*.



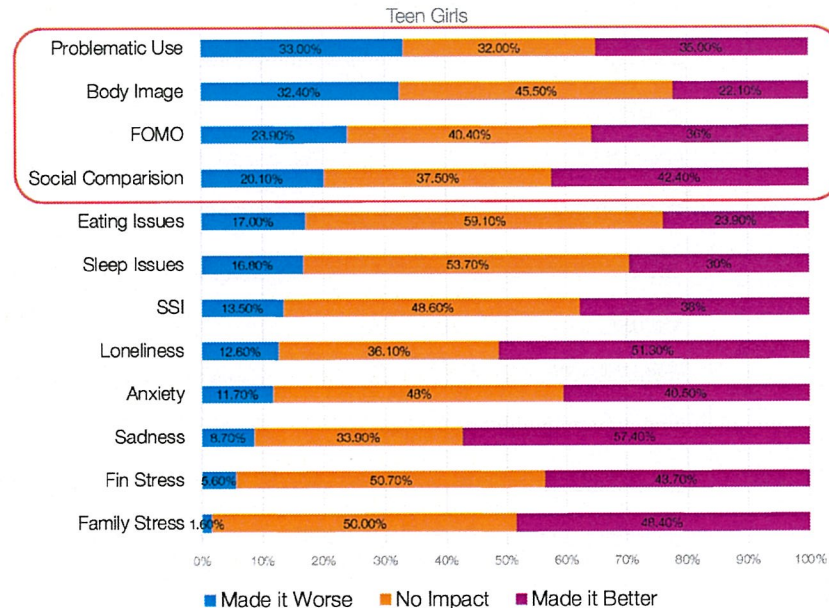
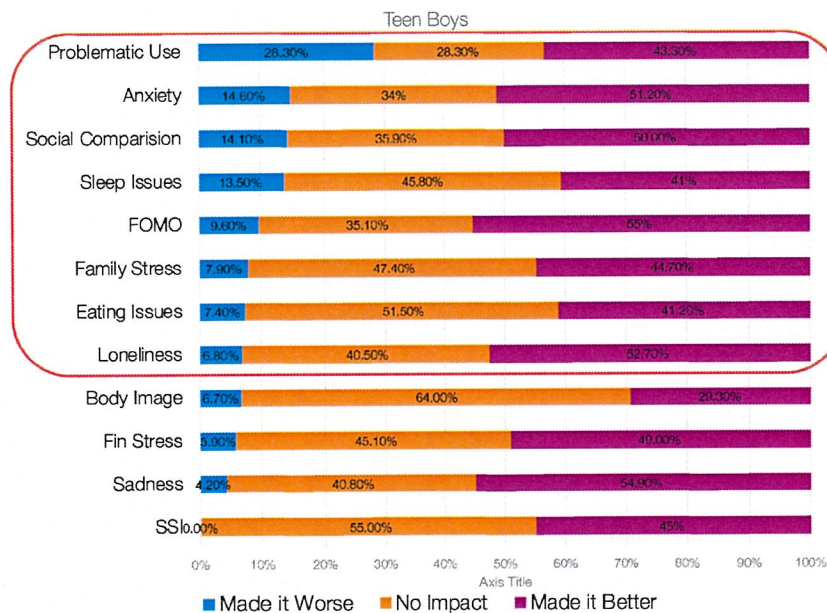
Q: What impact did using Instagram have on this experience?

There were no stat sig differences between those that thought IG made things better vs. had no impact.

* Differences are statistically significant at 95% CL. There are no meaningful differences between social comparison, body image, FOMO, Sleep Issues, SSI and Anxiety.

BUT, WE MAKE BODY IMAGE ISSUES WORSE FOR 1 IN 3 TEEN GIRLS

Teens also generally thought that IG made things better or had no impact. However they were also more split around problematic social media use and the role we played in it. More teen girls thought that IG made body image issues worse rather than better



Q: What impact did using Instagram have on this experience?

*Buckets highlight groups of issues that were not stat sig different from each other.

**All differences called out are statistically significant at 95% CL following a Bonferroni correction for multiple comparisons.

MOST USERS USED INSTAGRAM TO TAKE THEIR MIND OFF EXPERIENCE

They also used Instagram to find inspiration when having a hard time and get support from friends and family. Instagram was rarely used to raise awareness, learn more about the experience or inform friends and family about it. Self-reported usage of Instagram did not differ between teens and adults.

	Distract from experience	Did not engage	Get support from friends and family	Find Inspiration	Raise Awareness	Inform friends and family	Learn more about it	Something else
SSI	49.40%	32.70%	15.60%	25.00%	4.20%	6.50%	5.40%	5.40%
Body Image	27.90%	43.30%	8.70%	22.40%	9.50%	3.50%	13.00%	6.20%
Loneliness	50.00%	30.10%	17.70%	27.30%	6.60%	6.60%	7.40%	6.00%
Social Comparison	41.50%	31.00%	13.80%	25.80%	9.50%	5.30%	10.50%	5.20%
Financial Stress	39.00%	36.80%	11.50%	21.40%	5.80%	4.60%	8.80%	6.10%
Work Stress	52.90%	30.10%	12.70%	21.50%	7.90%	6.90%	7.90%	6.90%
Family Stress	52.20%	31.10%	14.60%	21.10%	7.90%	7.20%	8.80%	4.90%
Sadness/Depression	54.00%	24.40%	12.90%	24.20%	7.00%	7.10%	10.60%	9.10%
Anxiety	58.00%	26.90%	14.40%	23.60%	8.50%	7.50%	9.60%	4.50%
Sleep Problems	38.00%	42.90%	10.80%	15.30%	6.00%	5.70%	8.90%	6.30%
Problematic social media use	28.70%	40.00%	15.60%	19.20%	10.10%	9.80%	12.10%	8.20%
Eating Problems	28.20%	44.50%	8.40%	15.80%	7.40%	5.40%	9.90%	6.70%
FOMO	43.90%	27.50%	15.30%	23.40%	10.20%	7.40%	14.50%	7.30%

Q: When you had this experience, did you use Instagram in any of these ways? Please select all that apply:

*% correspond with colors such that the higher the % of people that selected the options, the darker the color of the tile and the lower the percentage of people that selected an option, the lighter the color of the tile.

15

MOST WISHED INSTAGRAM HAD GIVEN THEM BETTER CONTROL OVER WHAT THEY SAW (EXCEPT SSI)

Apart from content controls, ability to connect with others who had gone through similar experiences was another area where users wished Instagram had supported them. Teens and adults had similar expectations of support from Instagram.

	Connected with Experts	Connected with close friends and family	Connected with people with similar experience	Given me control over what I saw	Helped me share my experience	Something else
SSI	37.00%	17.90%	30.20%	24.10%	14.20%	7.40%
Body Image	20.80%	10.40%	26.30%	26.80%	10.40%	16.20%
Loneliness	18.70%	19.90%	26.90%	19.30%	11.50%	11.60%
Social Comparison	19.60%	17.80%	25.20%	35.70%	16.60%	10.30%
Financial Stress	20.50%	16.70%	19.50%	21.60%	10.10%	15.80%
Work Stress	16.80%	17.70%	21.60%	28.80%	14.00%	14.00%
Family Stress	18.70%	17.30%	24.10%	27.60%	10.20%	14.10%
Sadness/Depression	20.80%	19.80%	25.90%	29.00%	17.70%	13.80%
Anxiety	16.90%	17.30%	25.60%	30.60%	12.70%	11.90%
Sleep Problems	19.00%	16.80%	21.60%	26.60%	13.80%	16.20%
Problematic social media use	18.60%	19.90%	22.00%	38.30%	15.60%	12.00%
Eating Problems	17.40%	13.70%	21.00%	27.90%	11.00%	15.60%
FOMO	17.60%	21.10%	24.50%	30.00%	17.70%	13.60%

Q: What do you wish Instagram could have done to better support you during this experience? Please select all that apply:

*% correspond with colors such that the higher the % of people that selected the options, the darker the color of the tile and the lower the percentage of people that selected an option, the lighter the color of the tile.

16



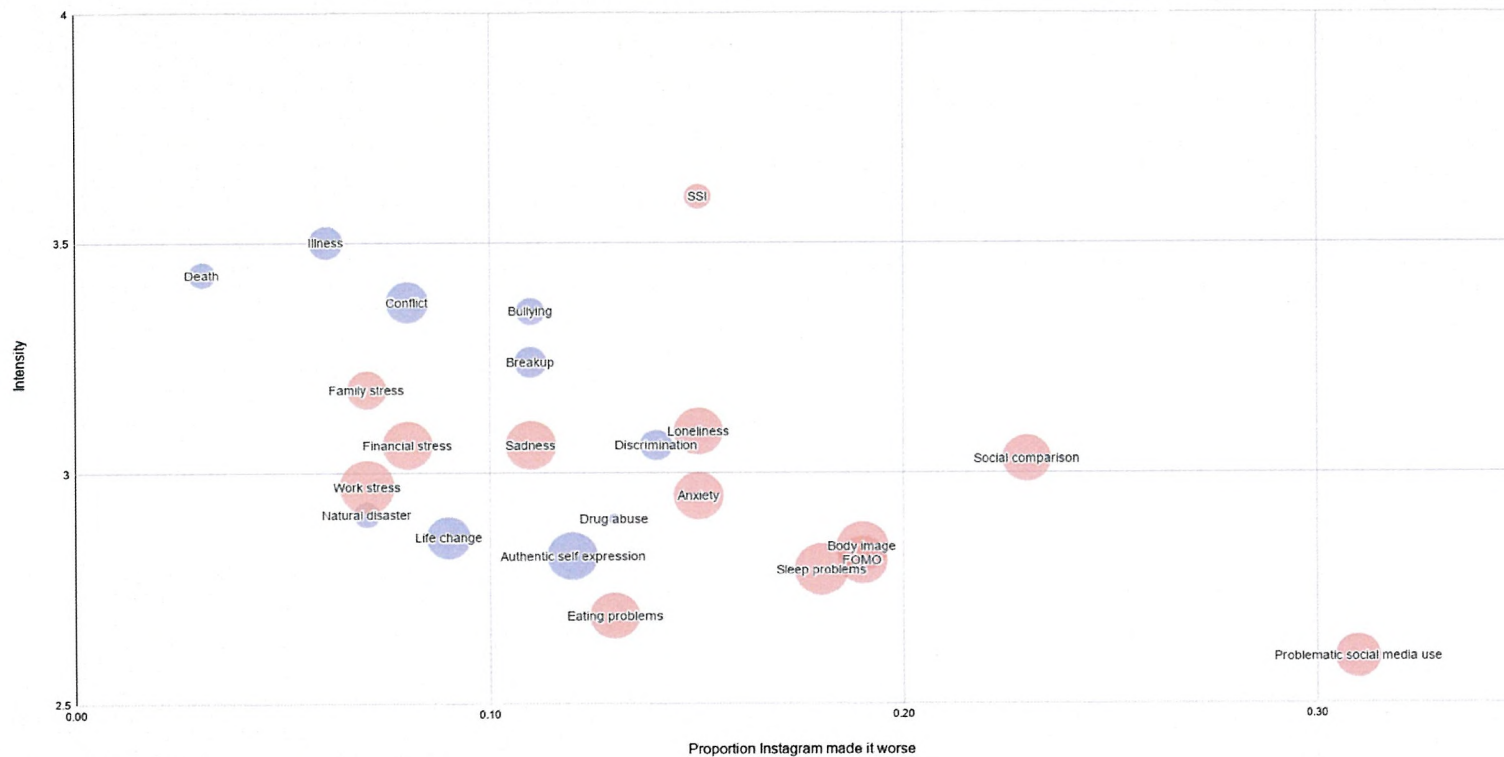
PRIORITIZATION

Which issues come on top and what should we care about?

SOCIAL COMPARISON HAS HIGH REACH, MODERATE INTENSITY AND WE ARE MAKING IT WORSE FOR 1 IN 4 PEOPLE

Just under 1 in 3 people blame Instagram for making problematic social media use worse. However this issue is specific to social media use only (unlike others)

Intensity x % Made worse x Reach



*Bubble sizes represent reach of issues such that the larger the bubble, the larger reach an issue has.

● Mental Health ● Other

HIGHLY CONFIDENTIAL (COMPETITOR)

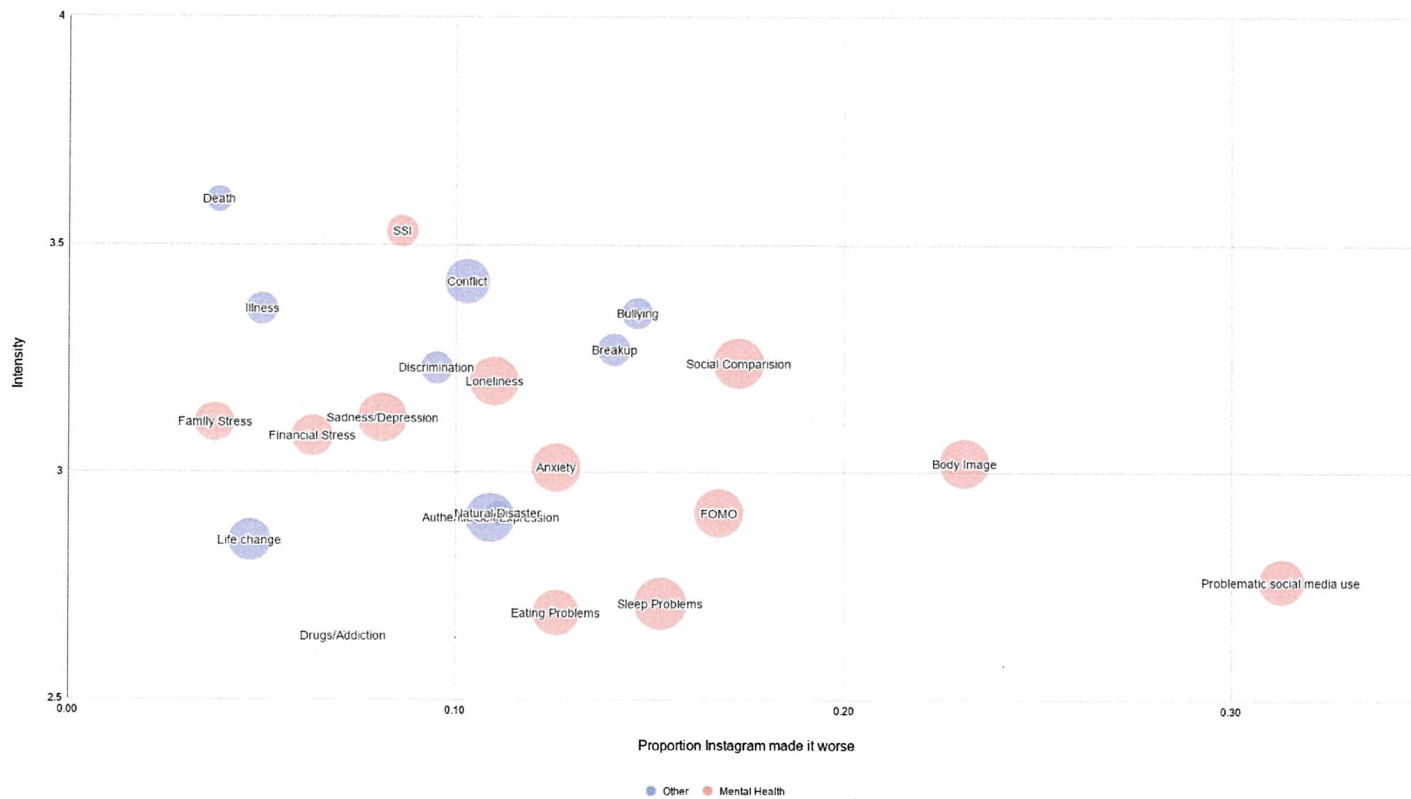
META3047MDL_RVOL003

META3047MDL-003-00095025

BODY IMAGE (A RELATED ISSUE) ALSO STANDS OUT FOR TEENS

1 in 3 teen girls blame Instagram for making their body image issues and problematic social media use worse. Social Comparison is a high reach, high intensity issue that 1 in 5 teens thought we made worse

Intensity x Proportion IG Made worse x Reach - For Teens



*Bubble sizes represent reach of issues such that the larger the bubble, the larger reach an issue has.

SOCIAL COMPARISON RANKS HIGHEST AMONG ISSUES IG SHOULD CARE ABOUT

We ranked issues by each category (reach, intensity, IG impact and expectation), to generate a composite average rank such that lower average indicates that the issue should be higher on our list.

- Based on composite ranked scores, social comparison ranked highest across all age cohorts
- SSI ranked second, followed by depression (sadness), body image, anxiety and loneliness
- FB Survey: In the 2017 FB survey, social comparison ranked well below SSI, loneliness, anxiety and body image issues
- Opportunity**: Negative social comparison is a unique opportunity area for Instagram to tackle given its relatively higher reach, intensity and our assumed responsibility.

	Reach Rank	Intensity Rank	Expectation Rank	Impact Rank	Overall Rank
Social Comparison	8	6	2	2	1
SSI	12	1	1	6	2
Depression (Sadness)	3	4	4	10	3
Body Image	2	8	9	3	4
Anxiety	5	7	5	7	5
Loneliness	7	3	8	8	6
Sleep Issues	1	10	10	5	6
Problematic Use	10	12	3	1	6
FOMO	6	9	7	4	6
Family Stress	11	2	6	12	7
Financial Stress	4	5	12	11	8
Eating Issues (relationship with food)	9	11	11	9	9

*Rankings do not take into account stats sig differences or lack thereof and simply rank issues based on % and means.

20

FOR TEENS, IT IS FOLLOWED BY BODY IMAGE ISSUES

We ranked issues by each category reach, intensity, IG impact and expectation, to generate a composite average rank such that lower average indicate that the issue should be higher on our list.

- Based on composite ranked scores, social comparison still ranked highest for IG teens.
- For teens, body image (an issue related to and exacerbated by negative social comparison) ranks second.
- Opportunity:** Negative social comparison and related issues with body image are especially crucial to tackle given the high ranking among teens
- Opportunity:** There is opportunity to understand social comparison and the role it plays in impacting body image issues of teen girls

	Reach Rank	Intensity Rank	Expectation Rank	Impact Rank	Overall Rank
Social Comparison	2	2	2	3	1
Body Image	3	7	8	2	2
Loneliness	6	3	3	8	2
SSI	12	1	1	9	3
Problematic Use	9	10	4	1	4
Anxiety	5	8	5	7	5
Depression/Sadness	4	4	9	10	6
Sleep Issues	1	11	10	5	6
FOMO	7	9	11	4	7
Eating Issues (relationship with food)	8	12	7	6	8
Family Stress	11	5	6	12	9
Financial Stress	10	6	12	11	10

*Rankings do not take into account stats sig differences or lack thereof and simply rank issues based on % and means.

21



TEENS HAD SIMILAR EXPECTATIONS OF SUPPORT AS ADULTS FOR IG

Teens who experienced social comparison wished Instagram had helped them share their experience in a more authentic way

	Connected with Experts	Connected with close friends and family	Connected with people with similar experience	Given me control over what I saw	Helped me share my experience	Something else
SSI	13.50%	15.50%	36.20%	15.50%	15.50%	10.30%
Body Image	17.30%	12.00%	28.90%	78.50%	8.40%	11.10%
Loneliness	14.80%	19.60%	27.30%	31.20%	7.70%	12.00%
Social Comparison	16.80%	13.80%	26.30%	41.30%	14.70%	10.80%
Financial Stress	14.70%	18.60%	19.40%	25.00%	10.90%	11.60%
Family Stress	15.10%	18.90%	24.90%	25.50%	6.60%	11.30%
Sadness/Depression	17.50%	19.50%	22.00%	28.00%	17.00%	17.50%
Anxiety	15.20%	18.70%	28.80%	34.80%	11.60%	8.10%
Sleep Problems	15.70%	19.60%	21.20%	24.70%	14.50%	13.70%
Problematic social media use	21.00%	23.40%	25.10%	48.00%	19.20%	10.20%
Eating Problems	19.50%	17.80%	21.30%	32.00%	10.70%	11.20%
FOMO	19.50%	19.00%	25.30%	30.50%	18.10%	11.30%

RELATIVE IMPORTANCE OF ISSUES

Bullying, SSI and Discrimination are lower reach, but issues users feel we should provide support for. Social Comparison stood out as a high reach, moderate intensity issue that users want support for.



Intensity Q: How bad did this experience make you feel?

Responsibility Q: How important is it to you personally that Instagram tries to support people who have similar experiences?

24

HIGHLY CONFIDENTIAL (COMPETITOR)

META3047MDL_RVOL003

META3047MDL-003-00095031

	Reach Rank	Intensity Rank	Responsibility Rank	Role Rank	Overall Rank
Social Comparison	2	2	2	3	1
Body Image	3	7	8	2	2
Loneliness	6	3	3	8	2
SSI	12	1	1	9	3
Problematic Use	9	10	4	1	4
Anxiety	5	8	5	7	5
Depression/Sadness	4	4	9	10	6
Sleep Issues	1	11	10	5	6
FOMO	7	9	11	4	7
Eating Issues (relationship with food)	8	12	7	6	8
Family Stress	11	5	6	12	9
Financial Stress	10	6	12	11	10

*Rankings do not take into account stats sig differences or lack thereof and simply rank issues based on % and means.

25

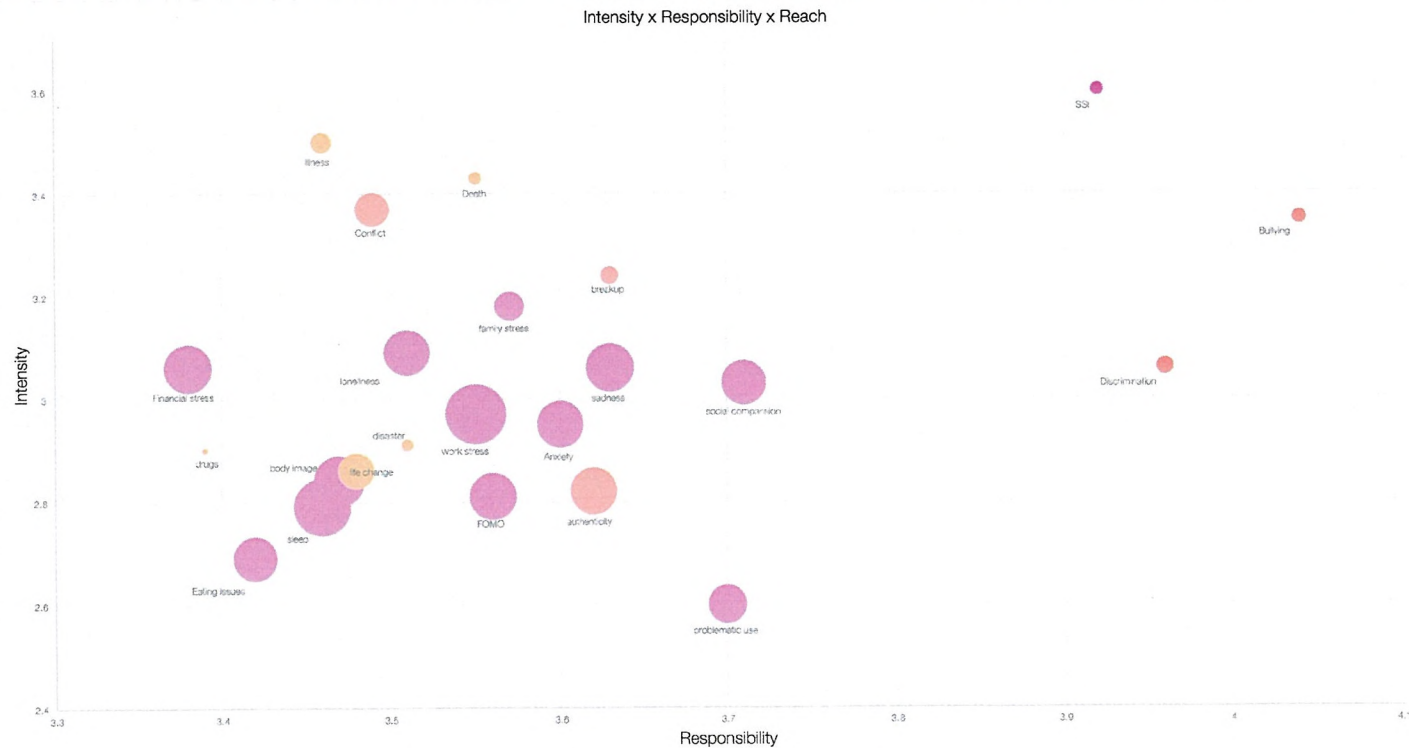
HIGHLY CONFIDENTIAL (COMPETITOR)

META3047MDL_RVOL003

META3047MDL-003-00095032

RELATIVE IMPORTANCE OF ISSUES

Bullying, SSI and Discrimination are lower reach, but issues users feel we should provide support for. Social Comparison stood out as a high reach, moderate intensity issue that we should support users on.



Intensity Q: How bad did this experience make you feel?
 Responsibility Q: How important is it to you personally that Instagram tries to support people who have similar experiences?

26

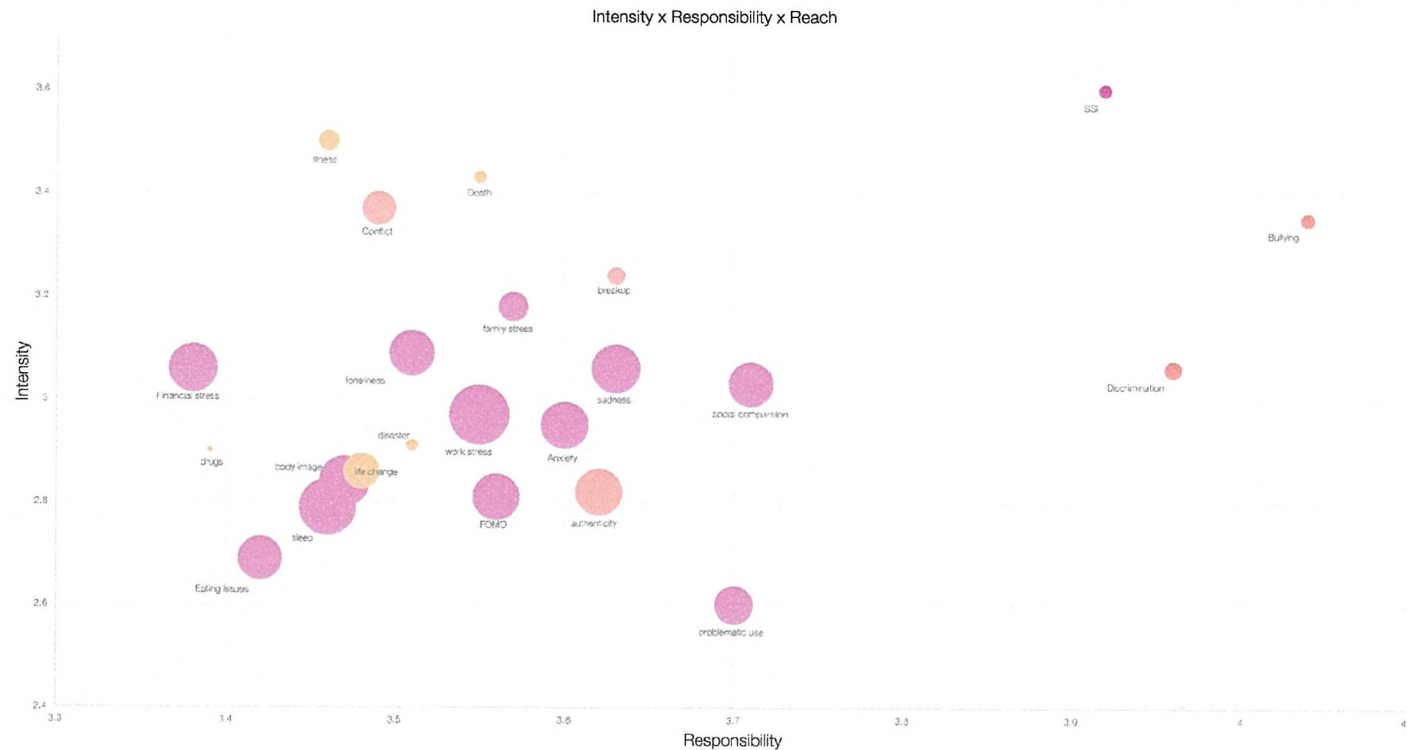
HIGHLY CONFIDENTIAL (COMPETITOR)

META3047MDL_RVOL003

META3047MDL-003-00095033

RELATIVE IMPORTANCE OF ISSUES

Bullying, SSI and Discrimination are lower reach, but issues users feel we should provide support for. Social Comparison stood out as a high reach, moderate intensity issue that we should support users on.



Intensity Q:
Responsibility Q:

27

HIGHLY CONFIDENTIAL (COMPETITOR)

META3047MDL_RVOL003

META3047MDL-003-00095034

