

AMENDED Exhibit 132

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

File Provided Natively

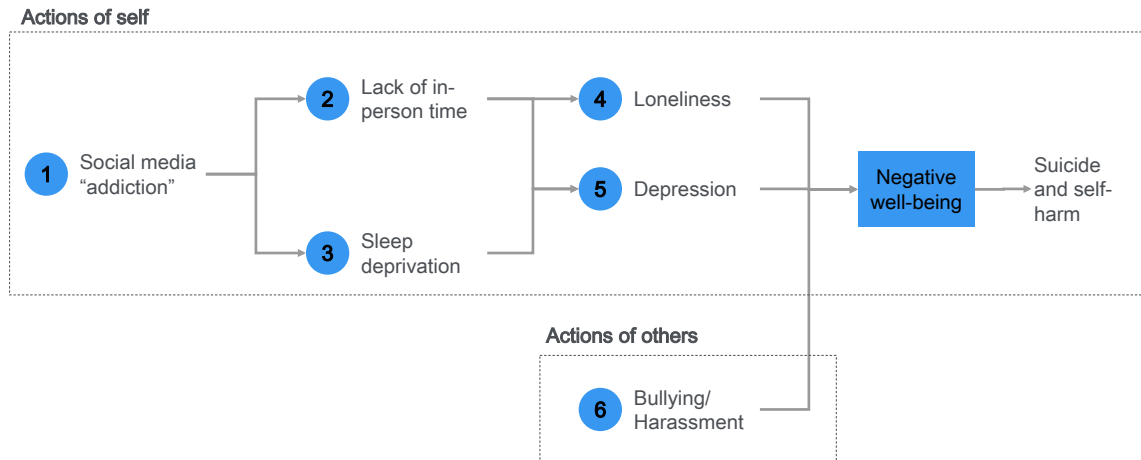


INSTAGRAM WELL-BEING STRATEGY DOC



- Product management
-  [@instagram.com](#)
- Jan 2018

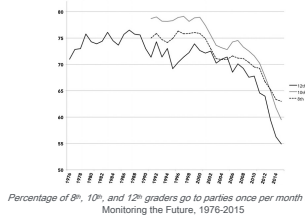
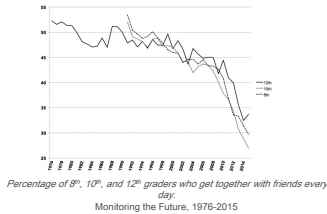
MODEL FOR HOW SOCIAL MEDIA USAGE MAY BE LINKED TO SUICIDE/SELF-HARM



1

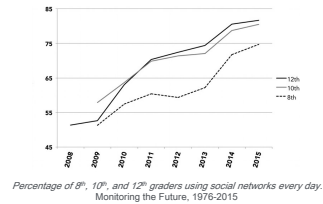
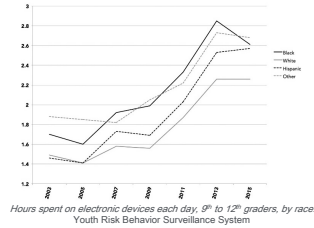
SOCIAL MEDIA ADDICTION: TRADING OFF IN-PERSON FOR MORE SCREEN TIME

Less in-person time...

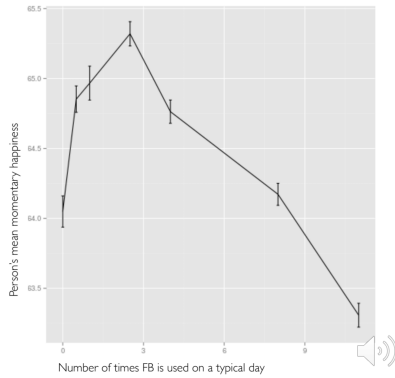


Source: (Gen: Why Today's Super-Connected Kids Are Growing Up Less Rebellious, More Tolerant, Less Happy—and Completely Unprepared for Adulthood—and What That Means for the Rest of Us— Jean Twenge (Aug 2017)

...More screen and social networking time

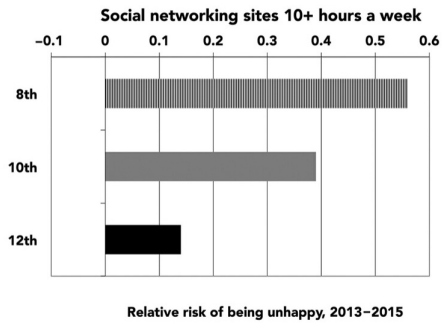


1 SOCIAL MEDIA ADDICTION: HEAVY USAGE OF FACEBOOK CORRELATES WITH LOWER HAPPINESS



- A person's momentary happiness increases with low/ moderate Facebook usage
- However, these gains are reversed and actually decline below baseline with heavy usage (>3x/day)

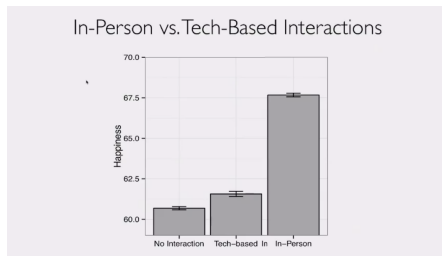
1 SOCIAL MEDIA ADDICTION: TEENS USING SOCIAL NETWORKING 10+ HRS/WEEK HAVE GREATER RISK OF UNHAPPINESS



Relative risk of being unhappy from spending ten or more hours a week on social networking sites, 8th, 10th, and 12th graders..
Monitoring the Future, 2013-2015

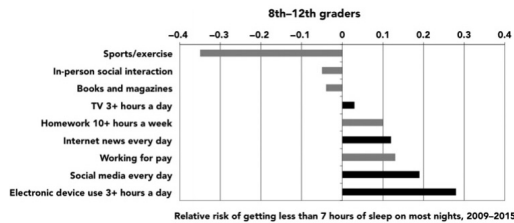
- Risk of unhappiness due to social media use is highest for youngest teens
- 8th graders who use social media for 10+ hrs/week are 56% more likely to be unhappy

2 LACK OF IN-PERSON TIME: HAPPINESS WITH TECH-BASED INTERACTION LOWER THAN IN-PERSON



- Tech-based interaction: lower than in-person; little better than "no interaction"
- Trading off in-person for tech-based interaction results in lower overall happiness

3 SLEEP DEPRIVATION: SOCIAL MEDIA, DEVICE USAGE INCREASES RISK OF INADEQUATE SLEEP

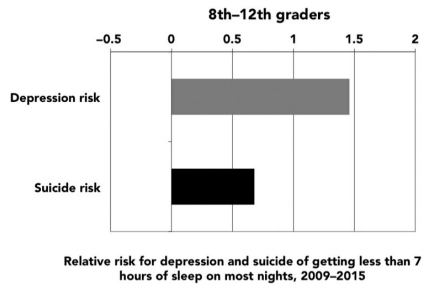


Relative risk of getting less than seven hours of sleep on most nights based on screen (black) and nonscreen (gray) activities
Monitoring the Future and Youth Risk Behavior Surveillance Systems, 2009–2015

- Teens who spent 3+ hours on electronic devices per day are 28% more likely to get less than 7 hours of sleep
- Teens who used social media every day are 19% more likely to get less than 7 hours of sleep

3

SLEEP DEPRIVATION: INADEQUATE SLEEP INCREASES RISK OF DEPRESSION AND SUICIDE

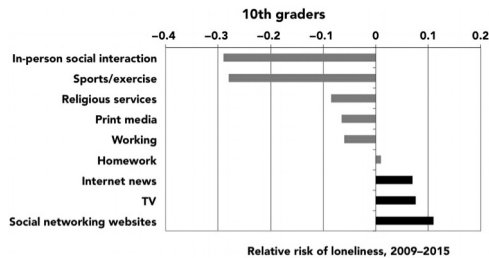


Relative risk of having a high level of depressive symptoms or having at least one suicide risk factor based on sleeping less than seven hours on most nights, 8th–12th graders
Monitoring the Future and Youth Risk Behavior Surveillance Systems, 2009–2015

- Teens who don't sleep enough are more than twice as likely to report higher levels of depressive symptoms
- Teens who don't sleep enough 68% more likely to have at least one suicide risk factor

4

LONELINESS: DAILY SOCIAL MEDIA USERS MORE LIKELY TO FEEL LONELY

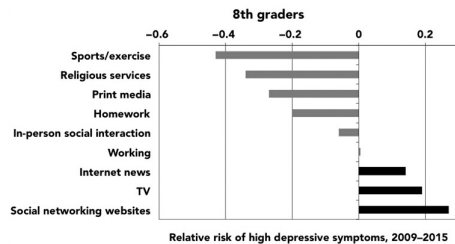


Relative risk of loneliness based on time spent on screen (black bars) and nonscreen (gray bars) activities, 10th graders
Monitoring the Future, 2009-2015

- Teens who visit social networking sites every day more likely to feel lonely
- Those who spend time with their friends in-person or who play sports are less lonely

5

DEPRESSION: DAILY SOCIAL MEDIA USERS MORE LIKELY TO DEVELOP DEPRESSION

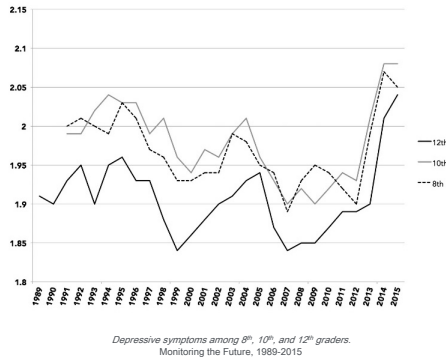


Relative risk of high depressive symptoms based on time spent on screen (black bars) and nonscreen (gray bars) activities, 8th graders
Monitoring the Future, 2009–2015

- Younger teens (8th graders) who are the most active on social media are also those who are at the greatest risk of developing depression
- For older teens (10th graders), social media use carries about even odds for depression

Source: iGen: Why Today's Super-Connected Kids Are Growing Up Less Rebellious, More Tolerant, Less Happy—and Completely Unprepared for Adulthood—and What That Means for the Rest of Us—Jean Twenge (Aug 2017)

5 DEPRESSION: SPIKE IN DEPRESSIVE SYMPTOMS SINCE 2011-2013, WHEN SOCIAL MEDIA ADOPTION GREW



- On a 5-point scale, teens experiencing depressive symptoms (trouble sleeping, remembering, learning, thinking) spiked starting in 2011-2013
- Although only correlational, this is also when smartphone adoption and social media adoption also grew within teens

