

AMENDED Exhibit 145

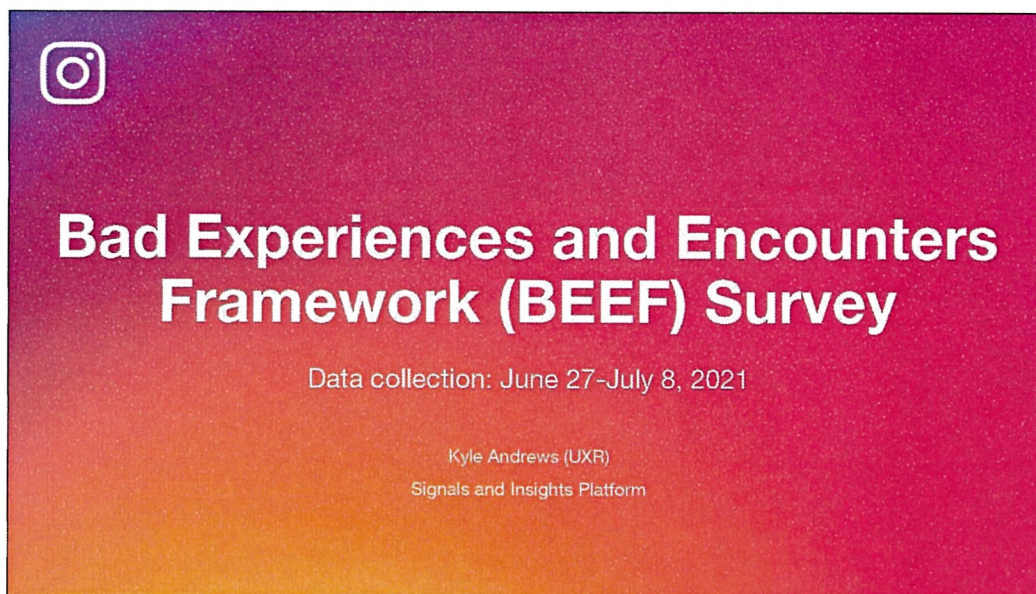
PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

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

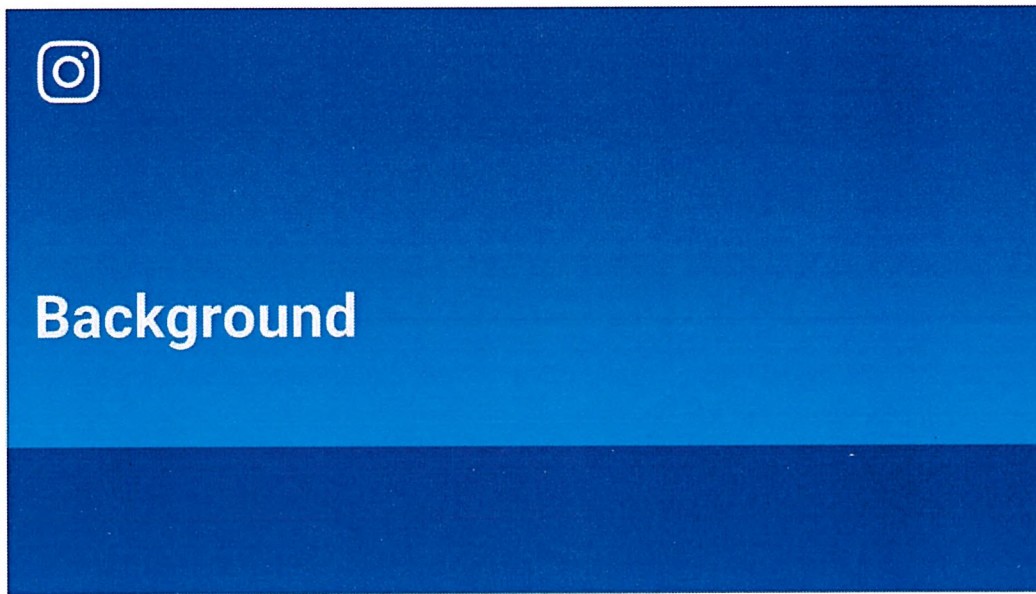
MDL No. 3047

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

P0063.1



P0063.2



P0063.3

Why are we doing this?

*To develop a **holistic, consistent** picture of user bad experiences on Instagram that allows us to **track our progress** each half.*

Holistic: TRIPS focuses on policy-violating experiences, but there are additional causes of bad experiences on Instagram. By contrast, the BEEF Survey pulls issues from the [Bad Experiences and Encounters Framework](#), which sourced issues from all of our user input channels.

Consistent: We have many sources of valuable user data, such as individual UXR surveys and interviews, FRX reports, flytrap, app store reviews, and social media listening. But, it's hard to make apples-to-apples comparisons between these data points, because of differences in how they're collected and weighted. The BEEF Survey asks a random sample of users the top 22 issues from BEEF, so we can compare and contrast easily.

Track our progress: Without a control group, it's impossible to determine causality from our other signals. The BEEF Survey was fielded to both the well-being holdout and production groups.

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Survey timeline

Date	To do	Status
April 12	Agree on which TRIPS questions to include	Complete
April 19	Use framework project results to generate proposal for additional survey constructs	Complete
April 26	Develop survey questions/ look for questions from existing surveys	Complete
May 3	Develop survey questions/ look for questions from existing surveys	Complete
May 10	Submit to research review	Complete (June 3)
May 24-June 3	Submit to survey review	Complete (June 9)
May 31-June 16	Submit to translations	Complete (June 29)
June 14-June 30	Launch survey	Complete (June 30)
June 21-July 6	Data cleaning	Complete
June 28-August 25	Data weighting/ appending	Complete (August 25)
July 19-August 26	Data cleaning	Complete (September 6)
July 26-September 7	Analysis/ reporting	In progress
October 4	Socialization	
October 11	v2 Framework	
October 18	Begin BEEF Survey v2 development	
December 16	Launch BEEF Survey v2 (code freeze Dec 16-Jan 4)	

What's next?

The plan is to add findings to this deck and the Bad Experiences Working Group as I go, with the goal of having a draft completed in the next two weeks. After that, I will focus on 1:1 and small group meetings with various teams, to share the findings relevant to them.

As I engage in socialization of the findings, I will also begin a literature review of work done since the v1 BEEF, to see if any new issues have emerged that should be included in the next BEEF Survey (v2 Framework, although it will be much more lightweight than the v1 effort).

I will use the current BEEF Survey and any new insights gathered during the v2 Framework to begin the survey development process for the v2 BEEF Survey.

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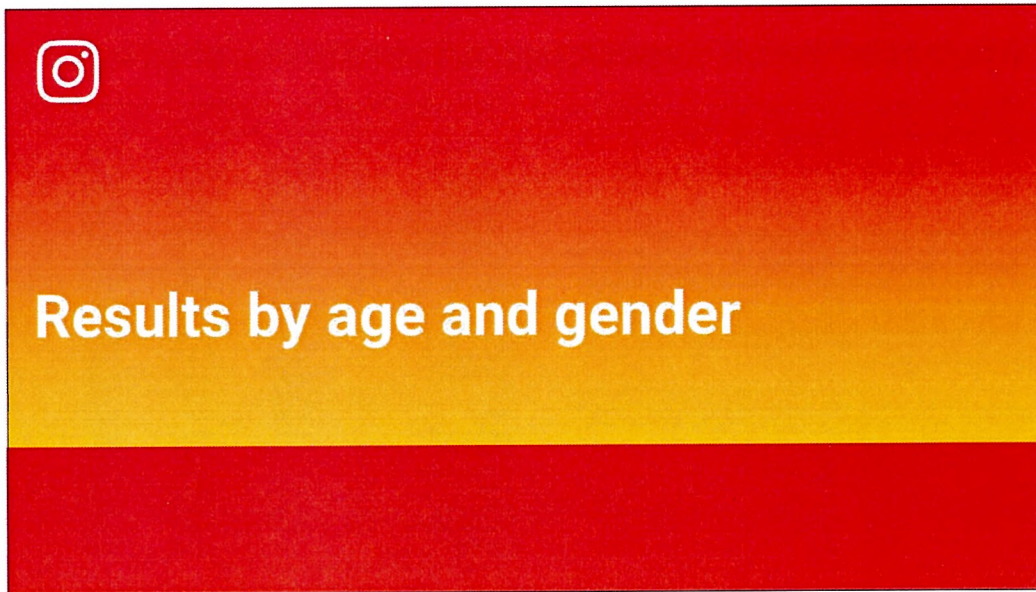
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Survey questions, issues

Questions that are also in TRIPS are highlighted in yellow. All questions had the same response options as TRIPS: 'Yes, during the last 7 days,' 'Yes, but more than 7 days ago,' and 'No.'

False or misleading	Have you ever seen anything on Instagram that was false or misleading?	Unwanted advances	Have you ever received unwanted sexual advances on Instagram?
Violence	Have you ever seen any violent, bloody, or disturbing images on Instagram that bothered you?	Account security	Have you ever been unable to access your Instagram account, either because of a lost password or because your account was hacked?
Hate (witness)	Have you ever seen anyone discriminating against people on Instagram because of their gender, religion, race, sexual orientation, or another part of their identity?	Civic content	Have you ever felt that you have seen too many political posts on Instagram?
Bullying (witness)	Have you ever seen anyone do any of these things to someone else on Instagram? -Insult or disrespect them -Contact them in an inappropriate way -Damage their reputation -Threaten them -Exclude them or leave them out	Impersonation	Have you ever found out that a Instagram account was pretending to be you?
SRG drug sales	Have you ever seen anyone trying to buy or sell any of the following things on Instagram? -Prescription drugs -Illegal drugs	Self-harm	Have you ever seen someone harm themselves, or threaten to do so, on Instagram?
Bullying (target)	Has anyone ever done any of these things to you on Instagram? -Insulted or disrespected you -Contacted you in an inappropriate way -Damaged your reputation -Threatened you -Excluded you or left you out	Spam/ fake account contact	Have you ever been contacted on Instagram by an account that seemed fake?
Nudity	Have you ever seen nudity or sexual images on Instagram that you didn't want to see?	Over enforcement	Have you ever felt that Instagram was wrong when it removed a post or video for violating the rules?
Negative Social Comparison	Have you ever felt worse about yourself because of other people's posts on Instagram?	Audience limitation	Have you felt that not enough people see the things you share on Instagram?
		Usability, action	Have you ever had difficulty posting a picture or video to Instagram?
		Transparency	Have you ever felt Instagram isn't transparent about why it removes posts that are against the rules?
		Usability, consumption	Have you ever experienced the Instagram app freezing, crashing, or closing unexpectedly?
		Data privacy	Have you ever had concerns about the way Instagram might use data and information about you?
		Perceived control	Have you ever felt a lack of control over what you see on Instagram?
		Commerciality	Have you ever felt that you have seen too many ads on Instagram?

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Respondents experiencing one or more issues

A little over half of respondents (51.6%) experienced at least one issue in the past 7 days

Each respondent was asked whether they've experienced any of five issues, randomly selected out of a set of 22 issues. 51.6% of respondents said they've experienced at least one issue. Within age groups, the percentage is highest among those age 16-17 (57.3%), followed by 18-21 (55.7%), and 13-15 (54.1%). The group with the lowest percentage of experiencing one or more issue is age 45+, at 31.2%. (Note: Age was the last question asked, so we only have age data for the 67.5% of respondents who completed the survey.)

	None	1 or more (out of 5)	% of each age group experiencing one or more issues
13-15	5,283	6,215	54.1%
16-17	7,371	9,888	57.3%
18-21	16,033	21,164	56.9%
22-26	12,520	15,713	55.7%
27-34	13,019	13,426	50.8%
35-44	9,978	7,689	43.5%
45 or older	7,877	3,564	31.2%
Prefer not to say	5,647	5,229	48.1%
Total	77,727	82,888	51.6%

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Issues by most and least impacted age groups

The 13-15 age group has the highest rates for 8/22 issues, while the 45+ group has the lowest rates of 21/22 issues

The table to the right shows the percentages of respondents who selected "Yes, during the last 7 days" for each of the issues, split by self-reported age. The green cells represent the lowest incidence for that issue across all age groups, and the red cells represent the highest incidence. Numbers that share a numeric subscript are not statistically significantly different from each other at $p < 0.05$. The full breakdown by all age groups is on the next slide.

The 13-15 age group has the most red cells (8)—that is, they have the highest rates of issue experience in 8 of the 22 issues, more than any other age group. By contrast, the oldest age group (45+) has the most green cells (21)—they have the lowest rates of issue experience in 21 of the 22 cells.

	Overall	13-15	45+
commerciality	48.2%	37.7% ^a	39.6% ^{a,f}
misinfo	30.3%	24.4% ^a	16.1% ^e
bully witness	28.3%	27.2% ^a	10.6% ^e
audience limitation	26.8%	26.2% ^{a,b}	15.9% ^e
usability passive	25.5%	30.1% ^a	10.1% ^e
hate witness	25.3%	26.0% ^a	9.0% ^e
data privacy	24.4%	17.9% ^a	14.3% ^e
perceived control	23.9%	18.4% ^a	14.2% ^d
fake acct 1st	21.8%	15.8% ^a	13.2% ^e
negative comparison	19.2%	21.4% ^a	6.8% ^e
transparency	17.5%	14.9% ^a	8.4% ^e
political posts	17.0%	14.3% ^{a,d}	8.7% ^e
nudity	16.3%	19.2% ^a	6.2% ^e
over enforcement	14.8%	14.1% ^{a,c}	5.9% ^e
violence	12.8%	12.8% ^{a,b}	5.0% ^d
unwanted advances	11.9%	13.0% ^a	6.9% ^d
usability action	10.7%	11.2% ^{a,e}	6.6% ^d
bully target	8.1%	10.8% ^a	3.4% ^e
self harm	6.7%	6.4% ^a	1.9% ^d
acct security	3.9%	5.2% ^a	1.3% ^d
drugs	3.9%	3.7% ^{a,b}	1.7% ^c
impersonation 1st	3.7%	5.5% ^a	0.3% ^b

An expanded table with confidence intervals can be found [here](#).

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Issues by all age groups

Younger people report higher rates of every issue, with some issues felt more universally than others

In general, the older the respondent, the less likely they are to report experiencing any of the 22 issues measured. All red cells (the age group with the highest rate of experiencing an issue) are within the four youngest age groups.

The gap between the lowest and highest issue rates vary by issue. Bullying witness, for instance, has the widest delta: 31.1% of the 22-26 age group report experiencing it, compared to only 10.5% of the 45+ group, a delta of 20.5 percentage points. Other large deltas include usability passive (delta = 20 points), hate witness (19.5), and misinfo (17.5).

By contrast, certain issues are experienced at similar rates regardless of age. For example, drug sales (delta = 2.1), account security (3.9), and usability action (4.6).

	Overall %	13-15	16-17	18-21	22-26	27-34	35-44	45+	Delta
		Column N %	Column N %	Column N %	Column N %	Column N %	Column N %	Column N %	Highest-lowest
commercially	48.2%	37.7%a	42.5%b,lg	47.6%c	51.2%d	50.5%e	44.8%b,e	39.6%e,f	13.50%
misinfo	30.3%	24.4%a	29.2%b	30.0%b,c	33.6%c	31.2%e	24.4%a	16.1%e	17.50%
bully witness	28.3%	27.2%a	29.4%b	29.9%b,c	31.1%e	27.4%a	19.8%e	10.8%e	20.50%
audience limitation	26.8%	25.2%a,b	29.3%a	28.1%a	28.7%b	24.9%e	20.3%e	15.8%a	13.40%
usability passive	25.5%	30.1%a	30.0%a	29.5%a	25.6%b	21.6%e	17.1%e	10.1%e	20.00%
hate witness	25.3%	26.0%a	28.5%b	27.9%b	27.8%b	22.5%e	15.7%e	9.0%e	19.50%
data privacy	24.4%	17.6%a	21.4%b	23.0%e	25.8%e	24.8%e,f	20.2%b	14.3%e	11.80%
perceived control	23.8%	18.4%a	20.0%a	24.8%b	26.7%e	24.7%b,c	20.9%a	14.2%e	12.50%
false acct 1st	21.8%	15.8%a	21.2%b	24.8%e	23.4%e,d	22.9%b,d	17.4%a	13.2%e	11.80%
negative comparison	19.2%	21.4%a	19.5%b	20.1%a,b	19.4%b	17.8%e	13.4%e	6.8%e	14.80%
transparency	17.5%	14.9%a	18.1%b,f	19.0%b	17.1%e	15.1%a	12.0%e	8.4%e	10.70%
political posts	17.0%	14.3%a,d	16.3%a,b	17.3%b	18.0%b,c	15.2%a,f	12.4%e	8.7%e	9.30%
nudity	16.3%	18.2%a	18.4%a	18.2%a	16.7%b	13.6%e	11.3%e	6.2%e	13.00%
over enforcement	14.6%	14.1%a,c	16.8%b	16.3%b	14.8%a,f	12.9%e	9.1%e	5.9%e	10.90%
violence	12.8%	12.8%a,b	14.3%a	13.2%a	13.1%a	11.5%b	8.2%e	6.0%e	8.30%
unwanted advances	11.9%	13.0%a	14.1%a	14.2%a	11.0%b	8.0%e	7.7%e,c	6.9%e	7.30%
usability action	10.7%	11.2%a,e	11.1%a,e	11.1%a	10.3%a,b	9.6%b	8.5%e	6.6%e	4.80%
bully target	8.1%	10.8%a	9.7%a	8.1%b	7.1%b,c	6.5%e	4.9%e	3.4%e	7.40%
self harm	6.7%	8.4%a	7.2%a,b	7.5%e	5.8%b	3.5%e	2.5%e,d	1.9%e	6.50%
acct security	3.9%	6.2%a	3.2%b,c	4.2%a,b	3.2%e	2.1%e	1.8%e	1.3%e	3.90%
drugs	3.9%	3.7%a,b	3.5%a,b	3.8%a	2.7%a,b,c	3.6%a,b	2.3%b,c	1.7%e	2.10%
impersonation 1st	3.7%	5.9%a	3.5%a	5.0%a	3.1%a	1.2%e	0.7%b	0.3%b	5.20%

An expanded table with confidence intervals can be found [here](#).

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