

AMENDED Exhibit 169

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

KNOW HOW TO TALK WITH YOUR TEEN ABOUT INSTAGRAM: A PARENT'S GUIDE



A LETTER FROM THE PARENTS OF INSTAGRAM



A COLLABORATION BETWEEN
INSTAGRAM AND NATIONAL PTA

If you're reading this, you're probably a parent. We know from research that many parents have concerns about their teen's safety online. As parents who also work at Instagram as well as parents who volunteer with National PTA, we want to address those concerns. It's with our teens in mind that we go into work every day. Parenting is both an awesome responsibility and an amazing opportunity. For all of the incredible opportunities parenting brings, there are some challenging ones too — we're raising the first generation of digital natives, for whom the online world is just as important as the offline one.

We know that as a parent it may be hard to understand what your teen is doing online and why they're spending so much time on their phones. While it might seem like posting photos and videos is second nature for teens, many of them actually put a lot of thought into what they

share online. It's hard to know how to have an open conversation with our teens and keep them safe while we're learning to navigate the landscape ourselves. We share these concerns, as does everyone who works at Instagram. That's why we're collaborating and have created this guide. We know it might feel daunting to have these conversations with your teens. We want to make sure you feel equipped with the tools you need to start the dialogue and hope this guide will make things a little easier.

We feel a great responsibility to make sure Instagram is a supportive community for teens to connect and share, and we want to make sure you as a parent feel informed and empowered to help guide them. We believe that the first step is understanding why they use Instagram, and what tools are available to make sure their experience is positive, intentional and safe.

For more information, and to watch a video where we explain these tools for you, go to parents.instagram.com.

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WHAT IS INSTAGRAM?

Instagram is a social media app used to share photos, videos and messages. Whether it's through Stories, Feed, Live, IGTV or Direct, our mission is to bring people closer to the people and things they love. In order to do this, we believe it's essential that Instagram is a safe, supportive place for people to express themselves. The minimum age to have an Instagram account is 13. Teens use Instagram to celebrate big milestones, share everyday moments, keep in touch with friends and family, build communities of support and meet others who share their passions and interests.

To learn more about the ways teens use the Instagram app, see the glossary at the end of this guide.



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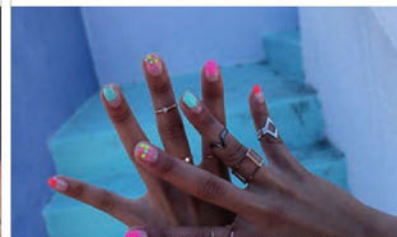
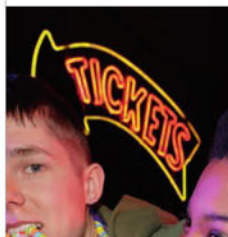
lil_lapislazuli



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"WHEN I'M USING
INSTAGRAM,
I DON'T THINK
ABOUT IT AS BEING
ON MY PHONE,
I THINK ABOUT IT AS
BEING MY VOICE."

TEEN JOURNALIST MALICK MERCIER,
@CLASSYMALICK



MANAGE PRIVACY



There are a number of tools you can share with your teen that will give them more control over their digital identity and footprint. One of the first things you want to talk about with your teen is whether their account is going to be public or private. Making sure they understand that they have control over who sees and interacts with the things they post online will empower them to feel like they can be themselves on Instagram.



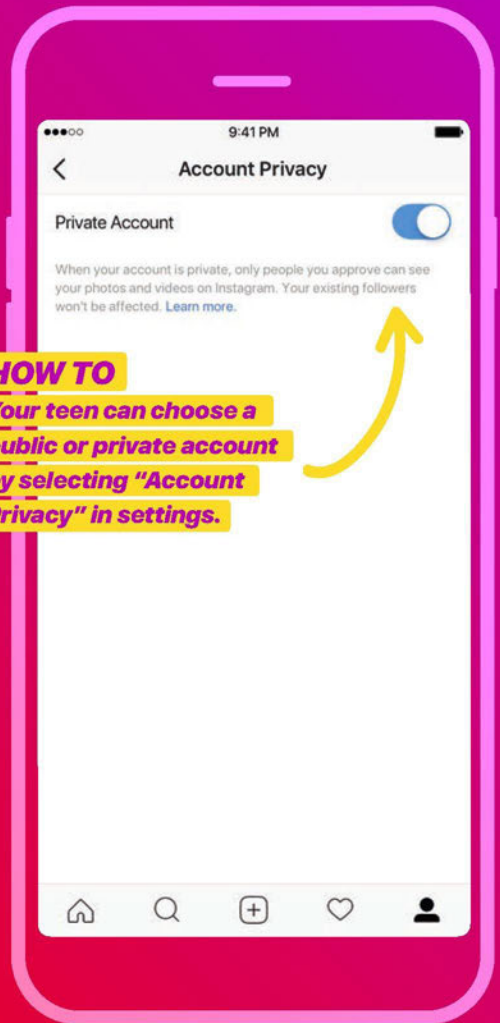
MANAGE PRIVACY

ACCOUNT PRIVACY

The first choice you can make with your teen is whether their account is public or private. If your teen's account is private, they approve the people who follow them, and can remove followers at any time. Private accounts mean your teen's content can't be seen by anyone they haven't approved. If your teen is public, anyone can see the content they post on Stories, Feed, or Live, and can follow them without needing approval. If your teen already has a public account, they can switch to private at any time; they can also go from private to public. They can remove followers, choose who can comment and more. Your teen can also turn off "Show Activity Status" so friends can't see when they're online.

HOW TO

Your teen can choose a public or private account by selecting "Account Privacy" in settings.



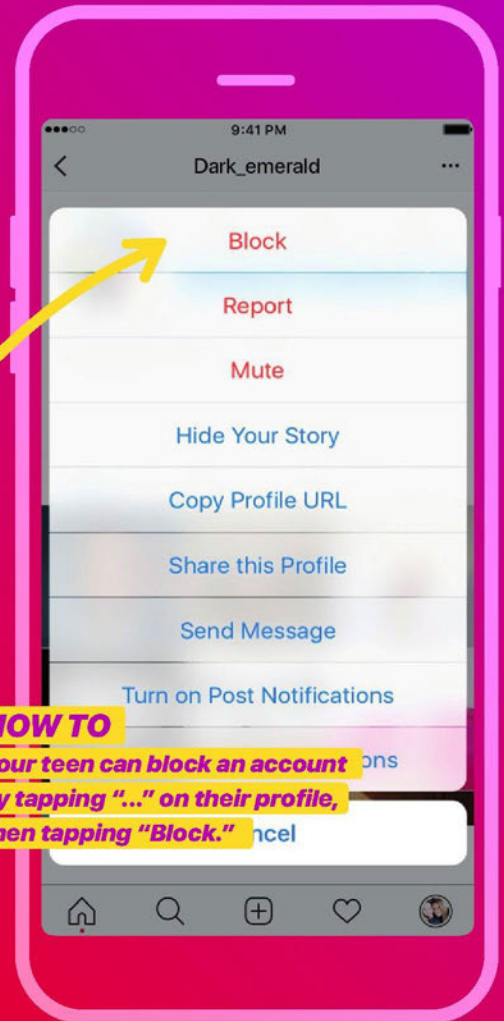
MANAGE PRIVACY

BLOCK UNWANTED INTERACTIONS

Your teen can block accounts they don't want to interact with. This will block people from seeing and commenting on their posts, stories, and Live broadcasts. When you block an account, that person is not notified. You can unblock an account at any time.

HOW TO

Your teen can block an account by tapping "..." on their profile,
then tapping "Block."



"MY MOM HELPS
ME BY MAKING
SURE THERE ISN'T
ANYBODY NEGATIVE
IN MY COMMENTS.
WE EITHER IGNORE
THEM OR BLOCK
THEM OUT."

AUTHOR, LEXI P.,
@CURLANISTAS



MANAGE INTERACTIONS



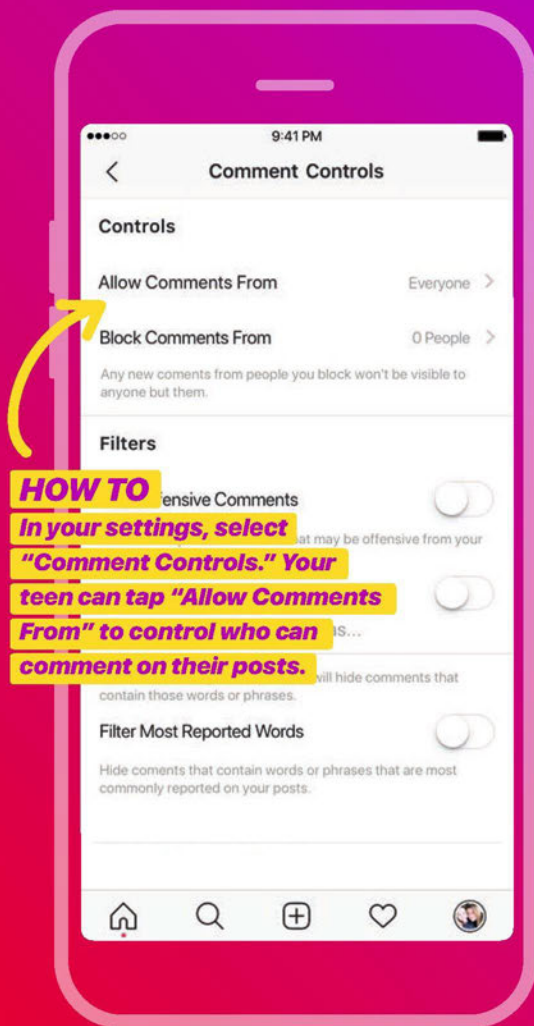
There is no place for bullying of any kind on Instagram and it's against our policies to create an account, post photos, or make comments for the purpose of bullying or harassing someone else. Let your teen know that if they spot an account, photo, video, comment, message or story that is intended to bully or harass someone, they can report it from within the app by tapping “...” on the top right corner of the post or profile, swiping left on the comment, or tapping and holding the message, and tapping “Report.”

Reporting is totally anonymous; we don't share your teen's information with the person who has been reported.

MANAGE INTERACTIONS

MANAGE COMMENTS

Your teen is in control of who can comment on their photos and videos. In the "Comment Controls" section of the app settings, they can choose to: allow comments from everyone, people they follow and those people's followers, just the people they follow, or their followers. Teens can also remove comments entirely from their posts.



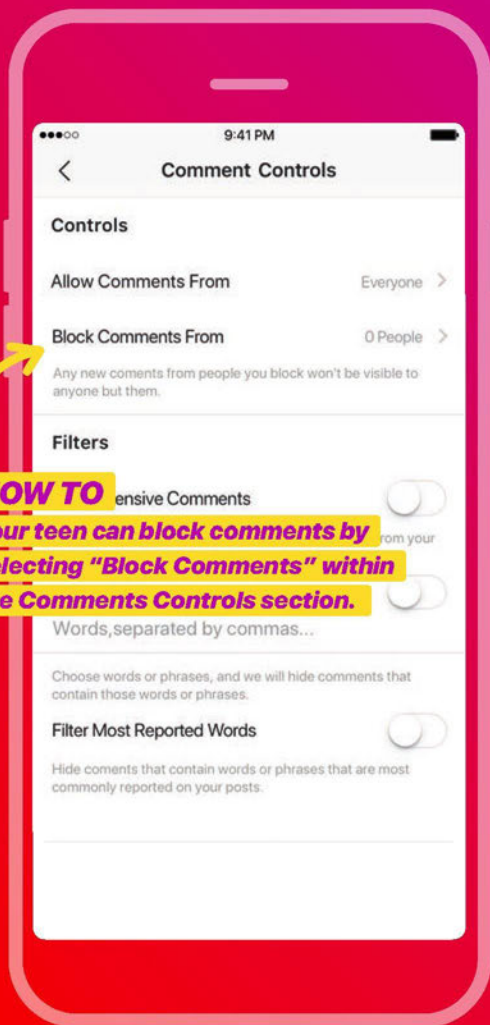
MANAGE INTERACTIONS

BLOCK COMMENTS

Teens can block accounts that they don't want to interact with. Comments will no longer appear from a blocked account. Teens can turn off comments from all posts or individual posts.

HOW TO

Your teen can block comments by selecting "Block Comments" within the Comments Controls section.





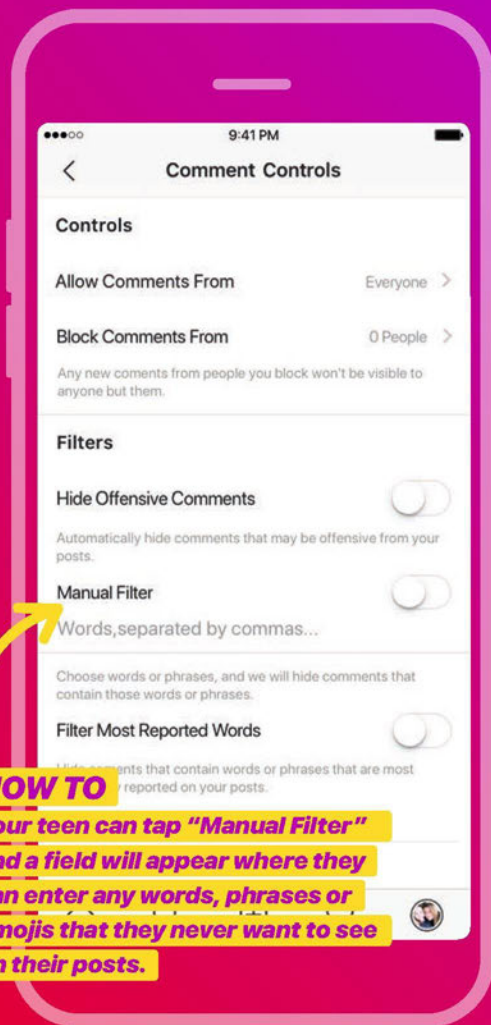
"HAVING THIS
ACCOUNT HAS
CHANGED MY LIFE,
BECAUSE I'VE
[HAD] A LOT OF
EXPERIENCES AND
MET A LOT OF PEOPLE
I NEVER THOUGHT
I WOULD MEET."

DANCER LIZZY HOWELL,
@LIZZY.DANCES

MANAGE INTERACTIONS

FILTER OUT COMMENTS

We have controls that help you manage the content you see and determine when comments are offensive or intended to bully or harass. We've built filters that automatically remove offensive words and phrases and bullying comments. Your teen can also create their own list of words or emojis they don't want to have appear in the comments section when they post by going to "Filters" in the Comment Controls section.

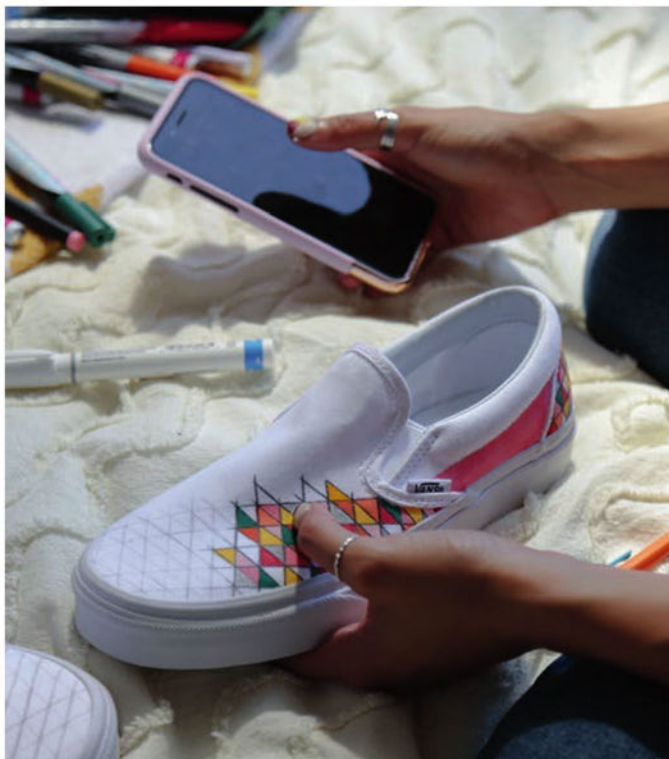


"SOCIAL MEDIA CAN
BE INCREDIBLY
HELPFUL AND
IMPACTFUL. IT
CAN GIVE YOU
A COMMUNITY
WHERE YOU DON'T
OTHERWISE HAVE
THAT COMMUNITY."

ACTIVIST ELEANOR WHEELER,
@ELLIEWHEELS

MANAGE TIME

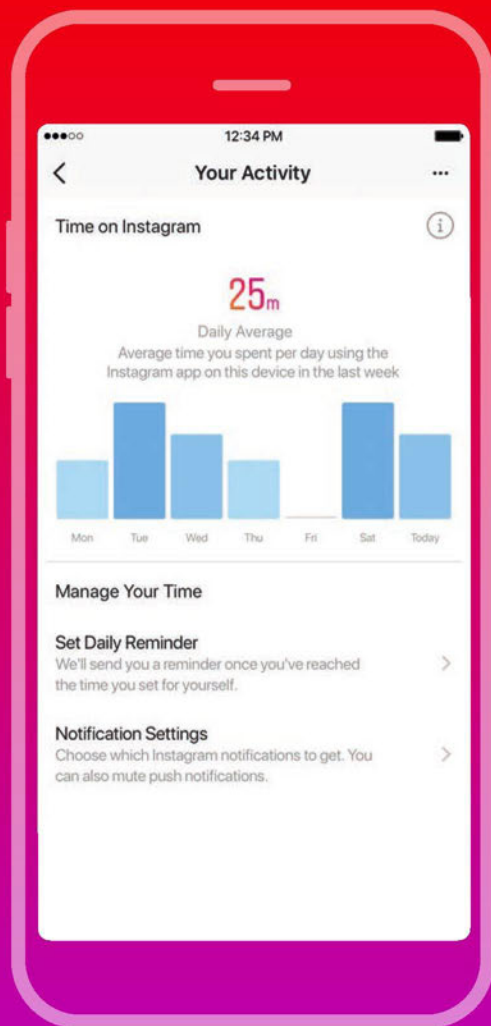
When it comes to spending time on Instagram, there's no right or wrong answer when it comes to how much is too much or just right. There are a number of tools to help you and your family understand and take control of the time your teen is spending on the app. You can work together to decide what the right balance is for your family.



MANAGE TIME

VIEW YOUR ACTIVITY

Your Activity Dashboard shows your teen how much time they've spent on Instagram for the past day and week, as well as their average time on the app. Your teen can tap and hold the blue bars to see how much time they've spent on Instagram on a certain day.



MANAGE TIME

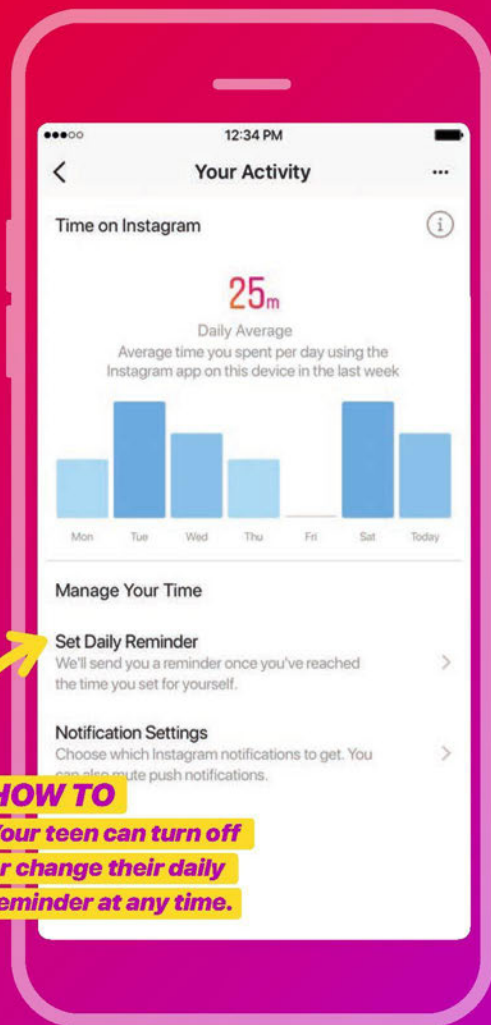
SET A DAILY REMINDER

Your teen can use the daily reminder to set a limit on how much time they want to spend on Instagram. Talk with your teen about how they feel while using the app. Is there a point when they don't get as much out of it? Setting the daily reminder together can be a good way to talk about how your teen is using Instagram throughout the day.



HOW TO

**Your teen can turn off
or change their daily
reminder at any time.**



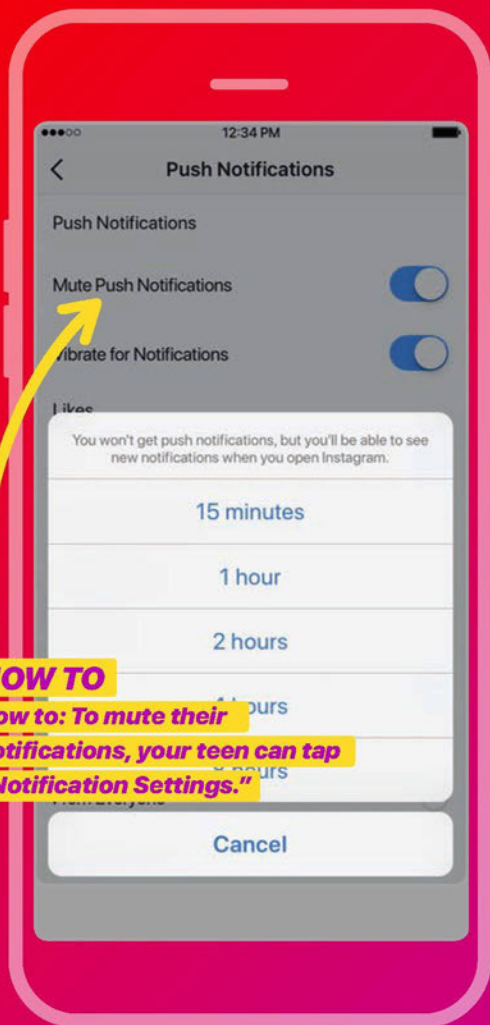
MANAGE TIME

MUTE PUSH NOTIFICATIONS

Your teen can use the “Mute Push Notifications” feature to silence Instagram notifications for a period of time. When the preset time is up, notifications will return to their normal settings without having to reset them.

HOW TO

How to: To mute their notifications, your teen can tap “Notification Settings.”



MANAGE TIME

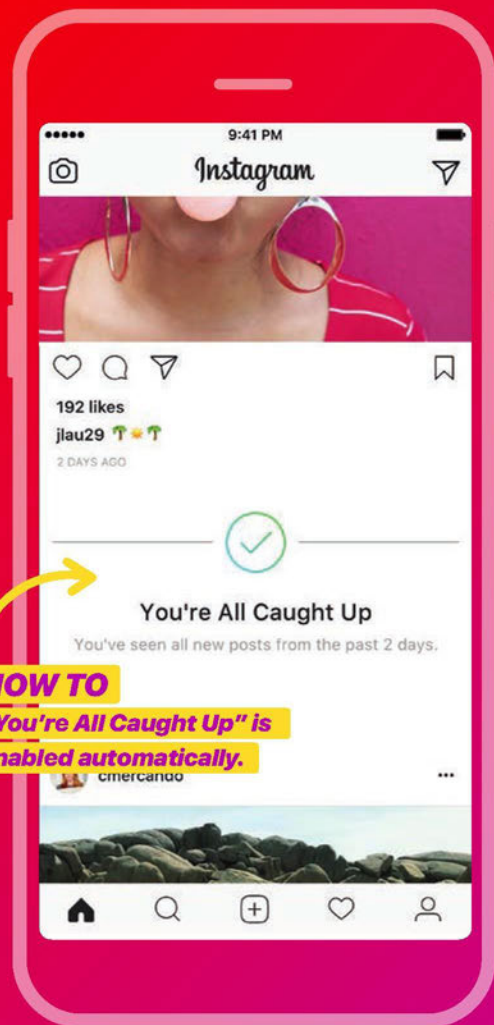
YOU'RE ALL CAUGHT UP

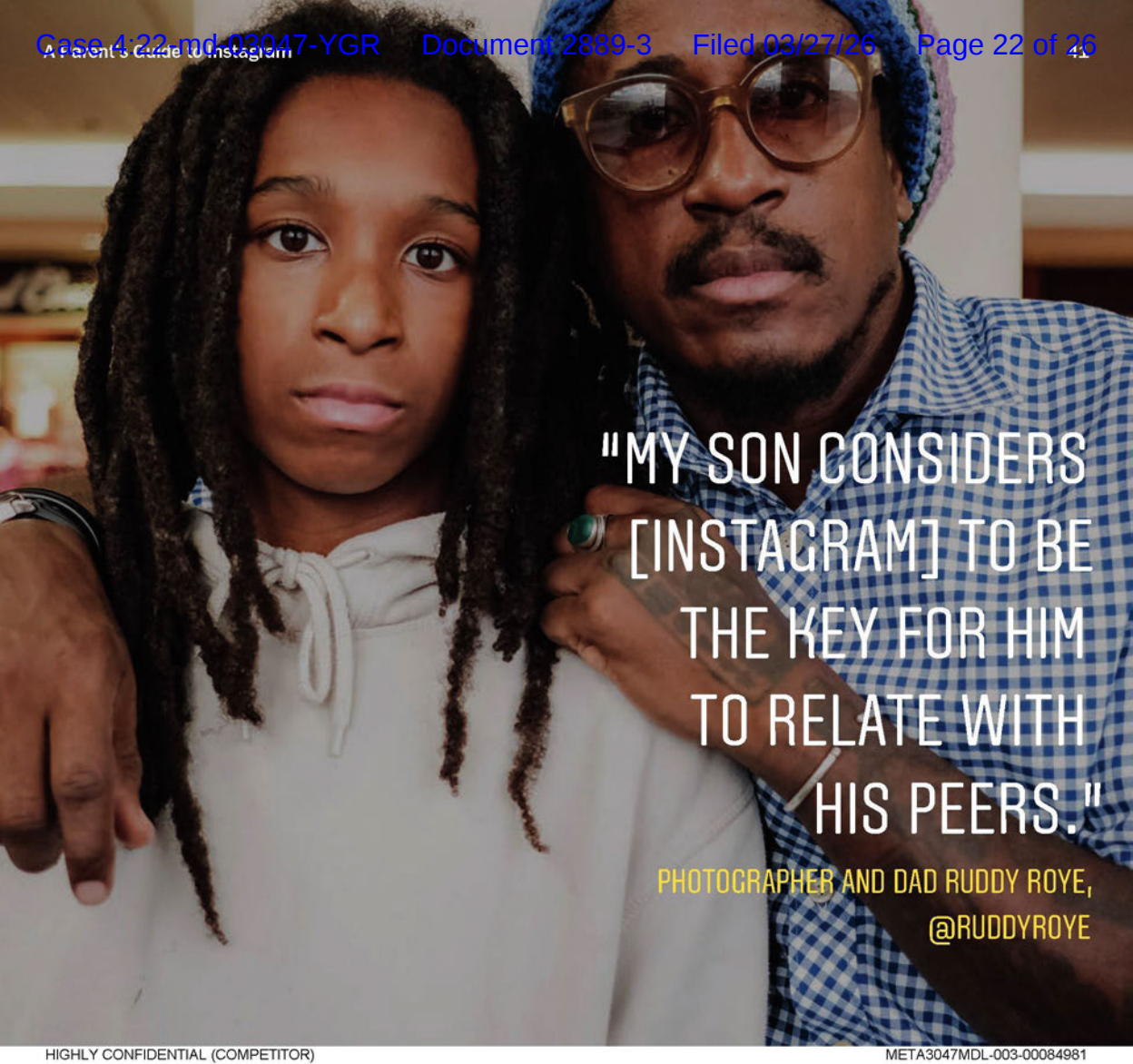
Teens can feel pressure to see and interact with all of their friends' posts. When they scroll through every post on their feed since they last logged on, they'll see a message that says "You're All Caught Up."

This way, they'll know that they're up to date on everything their friends and communities are up to.

HOW TO

**"You're All Caught Up" is
enabled automatically.**





"MY SON CONSIDERS
[INSTAGRAM] TO BE
THE KEY FOR HIM
TO RELATE WITH
HIS PEERS."

PHOTOGRAPHER AND DAD RUDDY ROYE,
@RUDDYROYE

TEN QUESTIONS TO HELP YOU START THE CONVERSATION

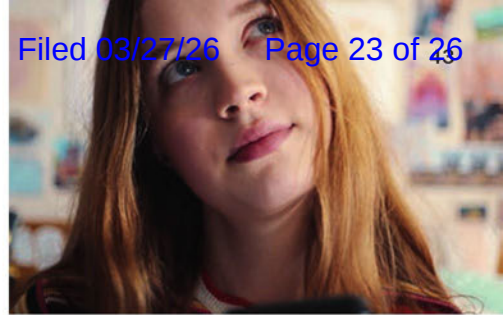
We partnered with social media and education expert Ana Homayoun, M.A., P.P.S., author of *Social Media Wellness*, to create a set of 10 questions you can use to guide a conversation with your teen about Instagram. Our intention is that you use these questions to learn more about how your teen is using Instagram, and to ensure they're using the app in a positive way.

01 What do you like about Instagram?

02 What do you wish I knew about Instagram?

03 What are the top five Instagram accounts that you enjoy following?

04 What are some things you think about before you post something on Instagram?



05 If you have multiple Instagram accounts, what do you share in each account?

06 How do likes and comments affect how you feel about a post?

07 Do you know your followers? (If your teen has a private account, ask them how they decide who follows them.) What do you do when someone you don't know tries to contact you via direct message?

08 How do you feel about the amount of time you spend online?

09 Have you ever felt uncomfortable with something you saw or an experience you had online?

10 What would you do if you saw someone being bullied on Instagram? (Do you know about the reporting tools and the offensive comment filter on Instagram?)

GLOSSARY OF INSTAGRAM TERMS



BLOCK

Block is a tool your teen can use if someone is bothering them on Instagram. When your teen blocks someone, the other person isn't notified, but they'll no longer be able to interact with your teen in any way.

COMMENT

A comment is a reaction to the content someone posts on Instagram. Comments appear below posts on your teen's feed. Comments can use words or emojis.

COMMUNITY GUIDELINES

We want to foster a positive, diverse community. Everyone who uses Instagram must adhere to our Community Guidelines which are designed to create a safe and open environment for everyone. This includes things like no nudity or hate speech. Not following these guidelines may result in deleted content, disabled accounts or other restrictions.

DIRECT

Instagram Direct is where teens can message each other individually or in groups. They can also share photos and videos with just the people they're messaging.

GLOSSARY OF INSTAGRAM TERMS

EXPLORE

Explore is where teens will see photos and videos from accounts and tags they might be interested in. Explore is different for everyone — the content changes depending on accounts and hashtags your teen follows.

FEED

Feed is where teens can see posts from the accounts they follow. Teens generally see feed posts as being more celebratory or special. Feed posts can be photos or videos.

IGTV

IGTV is a place for longer vertical video up to one hour. Your teen can find videos from their favorite creators, and can make their own longer content. IGTV is a standalone app as well as within Instagram.

LIVE AND VIDEO CHAT

Your teen can go live to share with their followers in real time. When live, they can invite friends to join them, co-host a live session or leave comments and send hearts. They can also video chat in Direct with up to four people.

POST

A post refers to the media your teen is putting on their Feed or on Stories. This can be video or photos.

PROFILE

Your teen's Instagram profile is where their friends and followers will find their posts, and can access their stories. It also includes a short bio. If your teen's profile is private, only their main profile picture and bio is visible.

REPORT

Reporting is a way your teen can let Instagram know that a post, account or comment is inappropriate. Your teen can report any post or comment that they believe violates our community guidelines.

STORIES

Stories disappear from the app after 24 hours, unless your teen has enabled archiving, which makes their expired stories available only to them. Your teen can share them in their Stories Highlights. Anyone who can view your teen's stories can screenshot them.

For more tools and resources to help you navigate healthy social media habits with your teen, visit parents.instagram.com



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