

AMENDED Exhibit 212

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

Message

From: [REDACTED] [/O=THEFACEBOOK/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=[REDACTED]]
Sent: 12/9/2015 8:46:23 PM
To: Kevin Systrom [REDACTED]; Mike Krieger [REDACTED]
CC: [REDACTED]
Subject: Re: Kevin / Mike: Extended Q&A Details + Actions

We need to work through which piece each of you wants to take. Our goal is for it to feel fluid and conversational between the two of you like a typical Q&A.

Below is a rough cut to keep us moving. In context [here](#). Do you and Mike want to iterate on this from here, or would you like us to flesh out the outline more first?

Thanks,
 [REDACTED]

2015 recap + 2016 : Kevin + Mike — [8 min]

[Kevin] Welcome & Recap

- This time last year we came together to talk about our plans for 2015. We said we were going to do three things:
 - Give people a visual voice
 - Connect our community to the world as it happens
 - Build a sustainable business
- And we've done all three
- Even better, the bigger industry shift we talked about is happening. People are communicating more visually and we are at the center of it.
 - The word of the year was an emoji!
 - And our filters are now the most popular baby names (make this section fun w personal anecdotes)
- But, more seriously, we accomplished a lot this year.

[Mike] 2015 Highlights & Challenges

- Some of the highlights from 2015 that you'll hear about
- Give people a visual voice-
 - More private sharing with Direct (#s); Huge wins with Boomerang, Layout where we learned how to launch separate apps; made sure people felt safe sharing with big initiatives in protect and support (add detail)
- Connecting our community to the world as it happens
 - Last year we talked about sitting in Dog Patch in 2010 and peering into the Giants game down the street
 - We launched S&E, Live Events... and gave people a way to see Halloween, Pride, Paris, Lunar Eclipse, Baltimore... as they were happening, in a way that was never possible
- Building a business — ramping, fueling our business, and creating value for advertisers and our community
 - [REDACTED] and [REDACTED] have some fun stats to share so I won't steal the thunder. But they scaled from 8 to 200 countries in the month of September alone. That is insane.
- Ending 2015 strong, but with some major challenges
 - Time spent is down or flat, while other companies do well
 - There's still too much great content on IG that people are missing
 - 2016 is going to be all about *the enjoyment and value people get out of Instagram*
 - We will measure this by time spent.
 - And we have a strong hypothesis.
 - In 2015 we made massive strides to connect the community to *the world as it happens*

- And we learned a lot about what works and what doesn't (include some anecdotes to tee up personalization)

[Kevin] Tee Up 2016

- In 2016, we are going to connect you to *your* world as it happens.
 - So you never miss a moment
 - Not just about timely, but about personalization
 - Content + consumption = more time spent = Great Business
- The team is going to walk you through how we are going to do it. Our three pillars remain essentially the same. Build a business – 1.2B target! Give people a visual voice. And connect people to their world as it happens. But how we get there will involve some big bets that continue to stretch Instagram to its potential.

Conclusion - Kevin delivers with Mike on stage [6 min]

It's going to be a big year. The most ambitious year we've had if we execute to our potential.

How will things look if we succeed next year? (in this section will pick the 1-2 major metrics for each theme for Kevin to speak to; [REDACTED] are providing input to clean this up)

- Give people a visual voice
 - Direct:
 - 6 original Weekly Media Shares/Direct WAP (H1 Goal: 2.5)
 - 50% IG DAP using Direct (H1 Goal: 30%)
 - Sharing: 5+ media/WAP broadcast shares (H1: +8% forecast)
 - Big bets: Multi post stories; Profile curation; Fast and reliable posting
- Connect you to your world as it happens
 - Consumption: +10% Time spent / DAP in H1 (North Star: 40 min Time Spent/DAP)
 - Big bets: Ranked Feed, Video, Personalized / timely discovery
 - Growth: 527M MAP by EOY
- Build a sustainable business
 - \$1.2B by EOY
 - 300k active advertisers in H1
 - Big bet: scale to FB's 3M advertisers, new interfaces, API, SMBs

From: Kevin Systrom [REDACTED]
Date: Wednesday, December 9, 2015 at 10:38 AM

To: [REDACTED]
Cc: Mike Krieger [REDACTED]

Subject: Re: Kevin / Mike: Extended Q&A Details + Actions

Hey [REDACTED] -

I'm confused – who is doing the first section? Right now it just has both of our names and no sense of who's saying what.

On Dec 9, 2015, at 10:10 AM, [REDACTED] > wrote:

Hey guys – wanted to check in to see how we can be most helpful with your intro / close for the Q&A on Friday.

The most efficient would likely be for the two of you to join the rehearsal tomorrow with the team so you have a chance to see the entire package and make sure your vision sets up the rest of the content. We'll work with [REDACTED] and [REDACTED] to set that up if you're okay joining.

I'm around today as well if there's anything I can do to talk through things and work on narrative with you.

Thanks,
[REDACTED]

From: [REDACTED]
Date: Monday, December 7, 2015 at 11:02 AM
To: Kevin Systrom [REDACTED] Mike Krieger [REDACTED]
Cc: [REDACTED]
Subject: Kevin / Mike: Extended Q&A Details + Actions

Kevin, Mike -

Below (and [here](#)) is the latest outline for the Extended Q&A on Friday. Presentation draft attached.

Kevin, the content below includes the rough intro notes that we discussed a few weeks ago. Do you and Mike want to take a look at your section and let me know how you'd prefer to move it forward? The two of you can iterate on it together, or we can schedule 30 minutes for the three of us to work through it and I can build it out in more detail.

Separately, there are some new topics being discussed and we want to make sure both of you are okay with the proposed positioning from [REDACTED] and the team in advance of rehearsals starting tomorrow. The areas in red are likely the most relevant:

- Personal anecdotes you and Mike want to use to drive home the important of personalization and time spent
- The way we are talking about video in 2016
- The way we are introducing ranked feed
- The themes in the monetization section
- The marketing component of the growth section [REDACTED] is going to walk you through this the week after the Q&A so we want to make sure you're okay w the company hearing this before you do)

Thanks,
[REDACTED]

+++

2015 recap + 2016 : Kevin + Mike — [8 min]

- This time last year we came together to talk about our plans for 2015. We said we were going to do three things:
 - Give people a visual voice
 - Connect our community to the world as it happens

- Build a sustainable business
- And we've done all three
- Even better, the bigger industry shift we talked about is happening. People are communicating more visually and we are at the center of it.
 - The word of the year was an emoji!
 - And our filters are now the most popular baby names (make this section fun w personal anecdotes)
- But, more seriously, we accomplished a lot this year.
- You'll be hearing more in each section - here are some of the highlights from 2015 that you'll hear about
 - Give people a visual voice-
 - More private sharing with Direct (#s); Huge wins with Boomerang, Layout; learning how to launch separate apps
 - Connecting our community to the world as it happens
 - Last year we talked about sitting in Dog Patch in 2010 and peering into the Giants game down the street
 - We launched S&E, Live Events... and gave people a way to see Halloween, Pride, Paris, Lunar Eclipse, Baltimore... as they were happening, in a way that was never possible
 - Building a business — ramping, fueling our business, and creating value for advertisers and our community (fill in w your anecdotes about what this means to you)
- Ending 2015 strong, but with some major challenges
 - Time spent is down or flat, while other companies do well
 - There's still too much great content on IG that people are missing
 - 2016 is going to be all about *the enjoyment and value people get out of Instagram*
 - We will measure this by time spent.
 - And we have a strong hypothesis of what steps can get us there.
 - In 2015 we made massive strides to connect the community to *the world as it happens*
 - And we learned a lot about what works and what doesn't (include some anecdotes to tee up personalization)
- In 2016, we are going to connect you to *your world as it happens*.
 - So you never miss a moment
 - Not just about timely, but about personalization
 - Content + consumption = more time spent = Great Business
- The team is going to walk you through how we are going to do it. Our three pillars remain essentially the same. Build a business – 1.2B target! Give people a visual voice. And connect you to your world as it happens. But how we get there will involve some big bets that continue to stretch Instagram to its potential.

Giving People a Visual Voice [7 min] “sharing and expressing”

2015 learnings [3 min: █████]

In 2015 we pushed boundaries across a wide array of surfaces to give people a visual voice — launching two separate and successful creative apps, making it easier to share within our main app and revamping Direct.

1. **We learned how to build and distribute separate apps**
 1. *Layout taught us how to distribute separate apps*

1. Stats of Layout downloads, MAP, and #1 in 45 countries
 1. 73M+ downloads
 2. 29M MAP
 3. 1M+ layouts shared to IG every day
 4. #1 in 46 countries this year
2. *Boomerang taught us we could build them fast [continue voiceover about success of Layout and speed of Boomerang]*
 1. Stats of Boomerang downloads and MAP, plot showing Boomerang growth relative to IG Layout
 1. 5M+ downloads
 2. 1.7M MAP
 3. #1 in 78 countries this year
2. **We learned we could make sharing easier with prompts and suggestions**
 1. *Suggesting tags prompts taught us that faster sharing means more sharing — and richer sharing — but we still need to think bigger to reverse the overall decline [continue voiceover about how prompts create intent and tagging suggestions making things easier]*
 2. Stats of increase in content production due to prompts and suggestions
 1. Prompts: Photo uploads +2% and video uploads +1%
 2. Android share flow improvements: Photo uploads +1.6%
 3. Location UI improvements: Increased server-backed location tags by +40% on iOS and +65% on Android.
 3. **Visual** of prompts on Android with **stat** of increase on content production
 4. **Visual** of new tagging flow with tagging increase **stat**
3. **And we learned how to give people a visual voice in private spaces with Direct**
 1. *Direct taught us that private spaces are growing more important every day [continue voiceover about how important Direct is to our sharing strategy]*
 2. **Visual** of Direct inbox and threaded messaging with **stats** of Direct pulled from Zuck H1 deck

2016 Focus [4 min: REDACTED]

In 2016, we want to give people a visual voice in small forums and large ones — capturing and sharing the world's moments means doing both well. We want to make private spaces richer and help people tell stories in the more public ones. We think that storytelling extends beyond the moment of capture and into who you are — so we'll be focusing on profile as well.

1. **Direct (Private sharing +)**
 1. *Direct is on fire — we want to add more fuel by optimizing for visual threads, channeling existing behavior on to the platform into Direct and creating new ways for Top Accounts to interact with the fans that love them.*
 1. Talk through metrics
 2. **Visual** of richer threads (from Zuck deck)
 3. **Visual:** screencast of funneling @mentions to Direct
 4. **Visual:** what can we show for Top Accounts? Thoughts Ian?
2. **Richer storytelling**
 1. *We hear often that sharing on Instagram is tough. There's a lot to think about — who will see what you share? Will you get enough likes? Etc. We think that by helping people tell their stories throughout the day we'll make it more fun for people to express themselves. To be honest, this has been one of the most*

difficult problems we've worked on in a long time so we've done a ton of different explorations to understand what's best.

2. **Visual:** horizontal scroll in feed
3. **Visual:** stacks in feed
3. **Focus on identity (Profile)**
 1. *Visual voices extend beyond the moment — and your Instagram profile is an extension of who you are — it's your visual voice that lasts. Teens go as far as having a single “theme” for their whole profile where every piece of media is filtered the same way. We think that by giving people new ways to curate their profile we'll “disconnect the moment from identity” and help people share more freely as a result. We'll help them highlight the content they're most proud of so their profile can evolve with them.*
 2. **Visual:** hiding from profile
 3. **Visual:** featuring content on profile
 4. **Visual:** stacks on profile

Connect you to your world as it happens [9 min]

2015 Learnings [4 min: ██████████]

Consumption is the “other side of the coin” to Sharing — it's how people can follow, discover and experience the amazing things that our community shares. In 2015 we re-invented our Search and Explore surfaces to better connect the community to the world as it happens.

1. **We learned the importance of personalization**
 1. *Trending and Collections taught us that timely content dominates and only the biggest of moments are universally interesting — so personalization will be key for us moving forward. This was re-enforced when we ranked media explore and saw a +3% increase in overall time spent. On the trending side, we found users tend to prefer some type of content based on their interests and demographics. This convinced us that we need to shift the experience to be personalized in order to impact time spent.*
 2. **Visual** of the most popular timely Collections (e.g. Places of Pride), **visual** of most popular trends (e.g. #dontjudgme) and **visual** of media explore
2. **We learned that focusing on search could meaningfully increase time spent**
 1. *Search showed us that leveraging Facebook's technical infrastructure and being laser focused on making things easier and faster can ultimately increase time spent on Instagram. We learned that search is a great tool to navigate to profile pages and discover new accounts. The team made several improvements to search ranking by learning from users behaviors and by looking at data to understand users behaviors. We found, for example, that a better search functionality can increase how many people come to Instagram and this is reflected by the number of time someone opens up the app or how many users use Instagram every day.*
 2. **Visual** of a graph showing the total # of searches increasing substantially, **stats** describing time spent increase, impact on growth etc.
3. **We learned to focus on video, video, video**
 1. *Our Halloween and Thanksgiving coverage and early “Just Press Play” results taught us that people engage heavily with video and spend lots of time watching them. They also really like spending time in the immersive viewer, as witnessed by median time spent of almost 1 min for Halloween and Thanksgiving. Being*

able to quickly learn from users which content is the most interesting really helped in providing a substantially better experience. Time spent doubled when videos were reordered to show the best content first.

2. **Visual** of our Halloween coverage
4. **And we learned how to keep our community safe as we scale**
 1. *Scale taught us that bad actors can ruin the best experiences with inappropriate content, scams or other abusive behavior so we need to be diligent to keep our community safe. We've seen several reports of inappropriate content being shown to users on trending, explore. The Protect and Support team has done an amazing job to help reduce the exposure to questionable content. This goes from providing new features and filtering models for bad content and also proactively putting hashtag pages into a protected state where most of the bad content is filtered out. What we've learned with explore is that even with personalization, inappropriate content can be shown to users and it really impacts users perception of our product. The team is building tools to proactively monitor and improve our filters to keep our product safe for our Instagram community.*
 2. **Visual** of a hashtag with inappropriate content blurred out and **stats** that describe the decrease in traffic we've seen for hashtags with inappropriate content

2016 Focus [5 min [REDACTED]]

In 2016, we're funneling our learnings to better connect people to their world as it happens. This means video, personalization and timely content will be key.

1. **Video**
 1. *Let's talk about video first.*
 1. *Linear TV is shifting to digital and we see this trend playing out across the world and demographics.*
 2. *Video on Instagram is also growing [insert stat about content production]. And top accounts, who have a lot of video content to share are producing more [insert stat re: TA production].*
 3. *Despite this growth, we still hear from TAs that IG isn't yet top of mind for them when it comes time to sharing their video content. Instead, IG is serving as a place to promote this content in order to direct their fans to other platforms like YT.*
 2. *So this half, we will focus on gaining mindshare as a place for video, especially video from TAs so that our community can continue to depend on IG as the best way to authentically connect with their favorite TAs and not have to go elsewhere to discover the content they love.*
 1. *TAs producing more video content would also have exciting impact on our company goals. 0.04% of accounts already command 50% of impressions on our platform, mainly in feed and on profile.*
 2. *We could see a significant lift in TS if we saw a mix shift in TA content towards video. [Insert stat on topline increase in TS if TAs produced x% more video]*
 3. *To encourage more video production, we'll complete the roll-out of video view counts, improve quality and reliability, as well as make it easier to produce by updating our tools.*
 4. **VISUAL:** Full slide edge to edge **visual** of the best videos that were shared to Instagram this past year (ideally exclusively)

2. **Making Explore a simple, cohesive, personal experience that connects you to your world as it happens**

1. *In H1, we're going to be funneling everything we learned about Explore - Spotlight, trending, immersive viewer, Explore posts — into a simple, cohesive experience that reincarnates our existing products in favor of helping you connect to your world as it happens.*
2. *We are going to re-design the surface so that the content, the reason to come here, is put front and center. You'll find auto-playing video or photo channels, featuring live events, topics, tags, places, filled with fresh content all personalized to you. And best of all, this new experience will be available globally from the start.*
3. *There's so much interesting, new content floating through the IG ecosystem every single day and with Explore, we want to make sure that no one misses the stuff they're interested in or could become interested in.*
4. *And, we're excited about how, with this new version of Explore, we can provide content creators an even more compelling reason to look to IG when it comes time to sharing their visual voice - through video and photo.*
5. **VISUAL:** of Explore v3
6. *One of the very key components to ensuring that this vision of Explore will entertain you through content that you'll like, is ensuring that all the content that people find, really anywhere on the platform, is relevant and safe.*
7. *This means enlisting the help of human raters to make sure content is relevant and it means that the Protect and Support team will be building a reputation system to make sure that repeat offenders can no longer damage the experiences of our broader community.*
8. **VISUAL:** showing media passing/failing relevancy checks and **visual** representing people getting different ratings

3. **Building a Ranked Feed for Instagram**

1. *We talked about how there's all this awesome interesting content out there for you every day on Explore that we don't want you to miss, but there's also another surface in the app, where we're seeing that users are missing a lot of the content that they've explicitly told us they are interested in - and that's feed.*
2. *At least 50% of feed impressions go unseen. That's a ton of amazing content that people just never get a chance to see. That's a big problem. That means that every time someone chooses to come spend time with us, we're under-delivering on our promise to connect them to their world that it happens. We're sending a message that you've seen it all when in fact there's so much more for you here.*
3. *Given this problem, and the opportunities we have in making a better experience for our users by addressing it, next half we'll be rolling out Instagram's version of ranked feed.*
4. *Now, we know the end state can be a massive improvement for our community. Facebook, for example, saw that ranked feed provided such a better experience that it led users to choose to spend 40% more time in the app each day.*
5. *But, we know that it's going to be hard to get there. This will be a huge change for the Community, for SMBs, for advertisers, for top accounts, so we're going to be very thoughtful and we are going to have to work together to ensure that we're landing on the best approach for all of our stakeholders.*
6. *But, we've ushered in controversial changes into our platform before, like non-square or the introduction of Ads. And we've done it with a great deal of thought,*

care and collaboration across the company. We've done it the IG way, staying true to ourselves and weaving in changes such that they are so native to the experience that users feel minimal disruption and more obvious benefit.

7. *We're going to be discussing this exciting and important change a lot more over the next couple of months, starting with next week's Q&A. The team will be diving into further details there so please do share your questions in advance. It's important that we're all a part of this dialogue and engaged.*
8. **VISUAL:** Showing someone scrolling through feed that then slides over to also show a **visual** graph of the % of stories that people miss in their feed (so both video and graph now appear on the slide).

Building a Great Business: [REDACTED] Q [7 min]

Themes to hit: personalization, how ads relate to time spent

- In July, [REDACTED] and I stood here in a similar "half recap" to share our ambitions for building a great business alongside a product people love and a massive global community. We set out a crazy galvanizing goal of growing to a \$1Bn business in 2016 at a time when the entire Ads product and business teams were heads down building like crazy on top of the FB ad stack toward that goal. [picture of first schematics of how our ads delivery would work]. Just like in so many other parts of Instagram, our relationship w/ Facebook is a giant superpower that has fueled our growth.
- As you've tracked in our weekly HPM and we celebrated at Q&A, we're having an amazing half driven by exceptional delivery on a doubly accelerated engineering roadmap and a very thoughtfully managed transition with sales team, clients and agencies. Please join me in a rousing thank you to recognize all the hard work of everyone who touches Monetization [animation of ramp of revenues from July 1 to now with a couple of milestones like Chik-Fil-A]
- We're very encouraged by the progress thus far and even more convinced of our potential as a business. The keys to our success this half remain our focus heading into next year:
 1. **Advertiser growth:** drive sustained spend from a diverse pool of advertisers
 1. We've tapped into the 3MM active Facebook advertisers where they buy and making it super easy to run on both or either platforms. API, Power Editor, Create Flow, LWI. Extend compatibility of objectives
 2. New solution for SMBs to boost from app "Lightweight interfaces"
 2. **Advertiser value:** prove we drive their business objectives
 1. emphasis on E2E performance of DR (UX thru attribution) plus media best practices, optimal campaign setup
 2. IG targeting signals incorporated into FB/IG for ranking & performance
 3. **Ad quality / user experience:** make IG ads as great as organic content based on health metrics
 1. show instrumentation and ad load vs hide rate. expansion to new hide flow signals & subsidies
 2. personalization = relevance not just aesthetics. and time spent ??
- Based on our trajectory and all the work we have planned, we're now pursuing a \$1.2B goal for 2016 (yes, raising target even before the year starts :)) We have so much momentum, now time to move from being the hip/trendy thing for marketers to being meaningful to their businesses' bottom line. Indispensability defines truly great businesses.

Growth: [REDACTED] [REDACTED] [REDACTED] [REDACTED] - [8 min]

Themes to hit: growth is cross-functional, driving awareness for and partnering with the world as it happens

- **Growth** [REDACTED]:
 - Of course, as we continue to focus on giving people a visual voice, connecting you to your world as it happens, and building a great business - we are continuing to grow our incredible community
 - Huge year for growth - we are ending the year at XX million - and this community is incredibly global
 - Not just about a # (although the # is hugely important!) – it's about coverage. With more people sharing their visual stories on Instagram, more of the world will be viewable to everyone.
 - What worked really well in 2015 was XXX
 - How we're going to think about Growth in 2016 is XXX
- **Marketing** [REDACTED]:
 - As [REDACTED] said, our growth mechanics are strong. Healthy app install conversion rates and healthy engagement and retention rates.
 - Now we're challenging ourselves to get more people into the growth funnel – which we believe will require a new approach. Here's why.
 - *Slide 1:* There's a perception gap between users and non-users. Affinity for Instagram among users is 80%, but only 17% for non-users. Additionally, non-users don't understand the benefits of Instagram. They are far less likely to agree that IG is a fun, simple way to express yourself and connect with your interests and passions (compared to existing users). Our hypothesis: if we can more clearly explain the benefits, non-users will be more likely to try us, and – therefore – we can accelerate MAP growth.
 - *Slide 2:* New approach.
- **Partnerships** [REDACTED]: As we inspire more new people to try Instagram, it's super important that they find the people who they are interested in. That's why we're planning to get more local and global top accounts onto the platform... etc

Conclusion - [6 min]