

AMENDED Exhibit 264

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=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=[REDACTED]

Sent: 8/27/2021 4:18:39 AM

To: [REDACTED] Miki Rothschild IG_Well-being_Leads

CC: [REDACTED] Shruti Bhutada Diego Castaneda Shilpa Mody [REDACTED] IGWB Support Leads

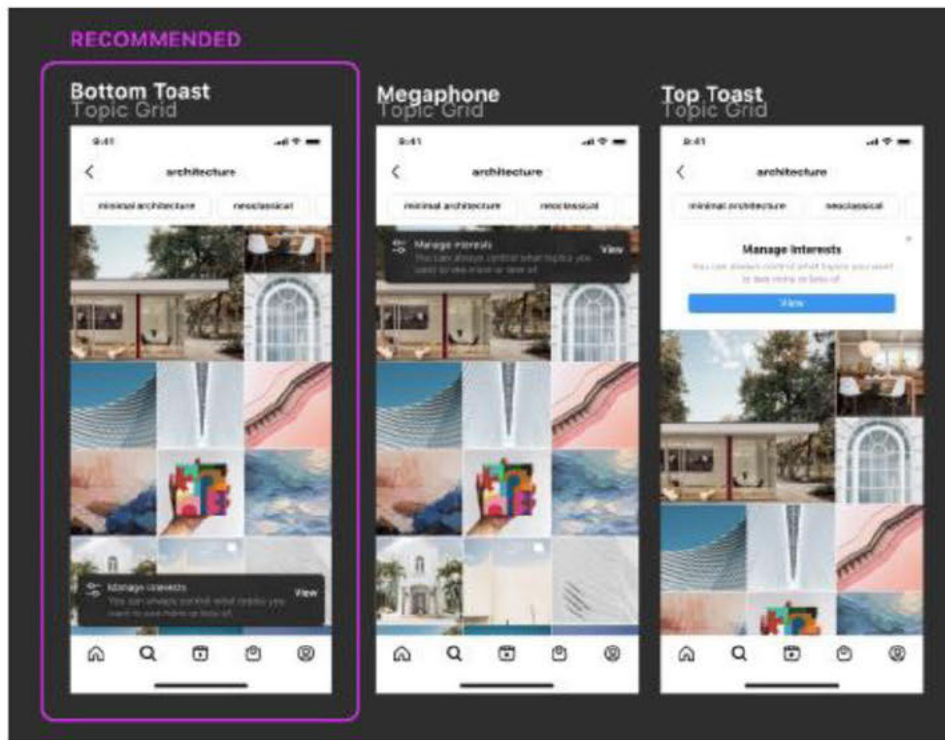
Subject: Re: [Email Decision Review] Mental Well-Being: Alternate Topic MVP

Attachments: Toast_alts.png; Nudge_alts.png

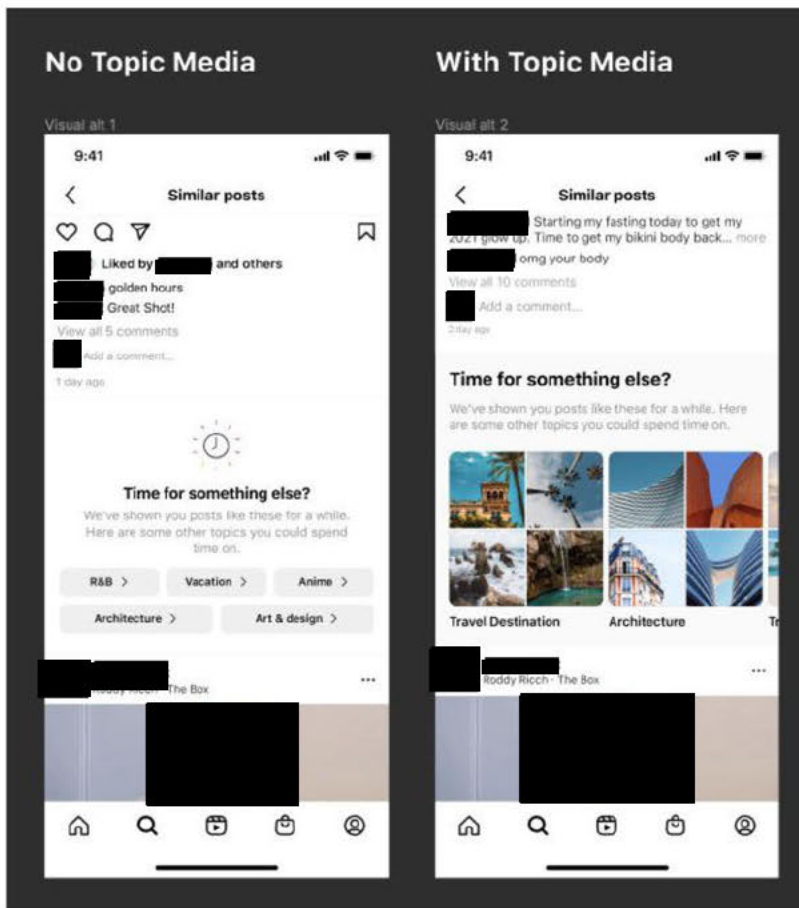
Apologies, it looks like some media did not come through in the previous email -

Manager Interest Toast: **[Miki] Have you considered other placements for that?**

[Team Response] Yes - we landed on the bottom toast as it best supports the hierarchy of actions we want people to take: Primary action: browse low NAC content, Secondary action: add topic in Manage Interest tool if they are interested in the topic. Alts considered 1) top placement for the toast: goes against IGDS guidelines and covers up media 2) megaphone: doesn't align with the hierarchy of actions.



Reg. the nudge design - the team plans to test via research the visual (MVP) vs. non-visual (future state) options for topic suggestions to understand what resonates best with teens



Thank you,

From:

Sent: Thursday, August 26, 2021 4:28 PM

To: Miki Rothschild
being_Leads

Cc:

; Shruti Bhutada

Diego Castaneda

Shilpa Mody

IGWB Support Leads

Subject: Re: [Email Decision Review] Mental Well-Being: Alternate Topic MVP

Thank you, Miki and [REDACTED] for the feedback and we are excited to see you are generally aligned with the approach. We plan to share our detailed plan (including going deeper on trigger definition and measuring success) in our review with you on 9/2 but wanted to circle back on your questions in the meantime (I've consolidated the team's response here):

Trigger: [Miki] The triggering condition (currently 10 posts and 35 posts, slide 19), I'm curious why we decided on these thresholds to test, and did we use any research correlation to decide on the best thresholds? 10 feels a bit low to me, 35 feels more clearly like a rabbit holing situation, but I assume we need some principled way to decide on this one.

[Team Response] Yes - we agree on the need for principles and here are the 3 guiding principles used for our recommendations: (1) do the simplest thing first (2) potential to move our goal metric (impact users who need it most) (3) makes sense in the context of the user experience (i.e. transparent interventions that balance frequency and reach).

Context/Methodology: User behavior data shows that median impression count on Explore chaining surface is 2 and p90 is 12. We combined with insights from qualitative research (user description of spirals) and quantitative research (where/when users are likely to have High-NAC chaining sessions), to recommend broad and narrow triggers for interrupting user experiences that are likely to be NAC spiraling. The specific thresholds reflect tradeoffs between optimizing for high precision targeting of users that we think would benefit the most from the intervention (35 impressions - precision of ~70% on target users, reach of 5% of IG teens) and having a broader intervention reach (10 impressions - ~63% precision, ~13% reach), all while maintaining a consistent product experience.

In mapping to the principles, the 2-variant recommendation:

- **do the simplest thing first:** by using impressions data from a single chaining session (vs. dwell time and multi-session)
- **maximizes potential to move our goal metric:** we diversified the triggers so our 10-impression variant helps us have topline impact on goal due to higher reach and our 35-impression variant maximizes impact per user (by helping those who need it most i.e. rabbit hole)
- **makes sense in the context of the user experience:** the trigger needs to be high enough for users to agree they've spent above average time. The 10-impression variant is based on single session p50 (2 impressions) and p90 (12 impressions) data - but like you mention, 10 is still risky because not all users may agree this is too much. 35 is narrower in reach but also has the highest chance of being considered a consistent user experience

Please let us know your feedback and we will also keep this as a discussion topic in our 9/2 review. Details are captured in this [document](#).

Measuring success: [Miki] I'm not sure exactly how to think about it but I see it's WIP. Should I ignore that for now?

[Team Response] We are still iterating from your feedback in the [8/12 review](#), but this is our first draft to address your feedback to create a more holistic checklist of criteria beyond "high NAC content" that'll be used for launch decisions. We recommend primary launch metrics - reducing high NAC content exposure and adoption. Secondary metrics represent additional signal that we are providing value to users (these are WIP because we have not yet finalized how we gather the signal). Guardrails are ecosystem metrics that could block a launch in case of regression - tradeoffs will be surfaced to leads. This is a metrics framework for measuring success, but we have also put together a [canonical checklist](#), broader in scope, to help us with prioritization decisions. Any early feedback is appreciated.

Design feedback:

Animation & haptics: [Miki] Animation too slow & consider haptics similar to "you're all caught up"

[Team Response] We will definitely speed up the animation. As we refine the animation, we'll explore how we can draw consistency with "you're all caught up" and land on an animation and haptics that is most appropriate for a soft intervention.

Content: [Redacted] Feels better than what we looked at earlier this week. What about something like "Here are other topics you might like" or "Here are other topics to explore"

[Team Response] As [Redacted] mentioned in her email, feedback noted - We are finalizing the content direction with community content review and hope to have final approval on Friday. This feedback is incorporated and we will have more to share soon.

Manager Interest Toast: [Miki] Have you considered other placements for that?

[Team Response] Yes - we landed on the bottom toast as it best supports the hierarchy of actions we want people to take: Primary action: browse low NAC content, Secondary action: add topic in Manage Interest tool if they are interested in the topic. Alts considered 1) top placement for the toast: goes against IGDS guidelines and covers up media 2) megaphone: doesn't align with the hierarchy of actions.

Thank you,
Mental Well-being Team

From: [REDACTED]
Sent: Thursday, August 26, 2021 9:01 AM
To: Miki Rothschild [REDACTED]

[REDACTED]; IG_Well-being Leads [REDACTED]
Cc: [REDACTED]
[REDACTED] Shruti Bhutada [REDACTED] Diego Castaneda
[REDACTED]
[REDACTED]; Shilpa Mody [REDACTED] IGWB Support Leads
[REDACTED]
Subject: Re: [Email Decision Review] Mental Well-Being: Alternate Topic MVP

+Support leads

From: Miki Rothschild [REDACTED]
Date: Wednesday, August 25, 2021 at 8:58 PM
To: [REDACTED]
[REDACTED] IG_Well-being Leads
Cc: [REDACTED]
[REDACTED], Shruti Bhutada [REDACTED], Diego Castaneda
[REDACTED]
[REDACTED], Shilpa Mody [REDACTED]
Subject: Re: [Email Decision Review] Mental Well-Being: Alternate Topic MVP

Thanks for sharing team! This broadly looks good to me – not overly intrusive (feels organic to the exp) but also provides transparency and control towards the problem we’re trying to solve for people.

A few questions:

- 1/ RE the triggering condition (currently 10 posts and 35 posts, slide 19), I’m curious why we decided on these thresholds to test and did we use any research correlation to decide on the best thresholds? 10 feels a bit low to me, 35 feels more clearly like a rabbit holing situation, but I assume we need some principled way to decide on this one.
- 2/ RE the manage your interests toast on the topical page (slide 20), have you considered other placements for that? I’m not sure exactly where but something about it didn’t seem intuitive to me.
- 3/ RE metrics criteria (slide 9), I’m not sure exactly how to think about it but I see it’s WIP. Should I ignore that for now?

From: [REDACTED]
Date: Wednesday, August 25, 2021 at 4:25 PM
To: [REDACTED] Miki Rothschild [REDACTED]
[REDACTED] IG_Well-being Leads [REDACTED]
Cc: [REDACTED]
[REDACTED], Shruti Bhutada [REDACTED], Diego Castaneda
[REDACTED]
[REDACTED], Shilpa Mody [REDACTED]
Subject: Re: [Email Decision Review] Mental Well-Being: Alternate Topic MVP

+ WB leads

From: [REDACTED]
Sent: Wednesday, August 25, 2021 4:21:16 PM
To: Miki Rothschild [REDACTED]
Cc: [REDACTED], Shruti Bhutada [REDACTED],
Diego Castaneda [REDACTED], Shilpa Mody [REDACTED]
Subject: [Email Decision Review] Mental Well-Being: Alternate Topic MVP

Hi [REDACTED] and Miki,

We are writing **to provide an update and seek approval on Alternate Topic Nudge MVP designs**. So far, we have received design approval from Community Design Review and IGWB Design Leads. We have aligned designs with IGDS and Feed & Relevance team in SPF review and with our PMM on its connection to external narrative. For content, we are expediting the review process while being very hands-on with a space as new and sensitive as this. We are circling back with Community Content Review after incorporating their feedback and should have final approval by Friday.

We will be reviewing these designs along with our second H2 visible product, Take a Break, on the Sept 2nd IGWB Review.

tl;dr

[Please see Design Source of Truth Deck for design details and phased out plan.](#)

- **Goal:** Help teens become self-aware of behaviors that make them feel bad about themselves/their appearance on IG and empower them to take control to reduce those experiences overall

- **Experience:** When teens tap on a high NAC content (content with high correlation to causing negative appearance comparison) in Explore and chain for a long time in Similar Post Feed, a nudge is shown that calls attention to the time you spent and provides options to pivot to a low NAC topic.
- **Targeting:** Teens in United States (US) Canada (CA) Britain (UK) (GB) Ireland (IE) New Zealand (NZ) Australia (AU)
- **Success measurement:**
 - Primary Launch Metrics: % Reduction in prevalence of High-NAC Content exposure on Explore surfaces (i.e. Similar Posts)
 - Secondary Launch Metrics: Adoption, perceived support, perceived effectiveness, sense of control
 - Guardrail: App sessions, Explore time spent, creator post impressions
 - Understand metrics: Survey measuring ground truth NAC, watch time, and content production

Thank you,
Mental Well-Being Team