

AMENDED Exhibit 265

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: Pavni Diwanji [/O=THEFACEBOOK/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=████████████████████]
Sent: 10/22/2021 7:10:53 PM
To: Adam Mosseri ██████████ Miki Rothschild ██████████
Subject: Re: [Need Approval by 10/22] Take a Break Content & Test Details
Attachments: image001.png

Looks good to me.

Pavni

From: Adam Mosseri [REDACTED]
Sent: Friday, October 22, 2021 9:48 AM
To: Miki Rothschild [REDACTED]; Pavni Diwanji [REDACTED]
Subject: Re: [Need Approval by 10/22] Take a Break Content & Test Details

Totally Pavni's call.

From: Miki Rothschild [REDACTED]
Date: Thursday, October 21, 2021 at 9:37 PM
To: Adam Mosseri [REDACTED], Pavni Diwanji [REDACTED]
Subject: Fwd: [Need Approval by 10/22] Take a Break Content & Test Details

This seems fine to me but want to check with you two before approving.

Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: October 21, 2021 at 10:51:59 AM PDT
To: Miki Rothschild [REDACTED] IG_Well-being_Leads [REDACTED]
[REDACTED] IGWB Support Leads [REDACTED]
Cc: [REDACTED]
[REDACTED], Shruti Bhutada [REDACTED] Shilpa Mody [REDACTED]
[REDACTED], Justin Cheng [REDACTED] Moira Burke [REDACTED]
[REDACTED] Dayna Geldwert [REDACTED]
[REDACTED], Liza Crenshaw [REDACTED]
Subject: [Need Approval by 10/22] Take a Break Content & Test Details

Hi Miki and WB Leads,

We have incorporated the feedback from IG Leads for **Take a Break** in preparation of the public experimentation (target: 11/1). We are writing to **share and get approval on (1) final content & layout and (2) final test details**. Please let us know if you are aligned or if there are any

concerns **by 10/22** so the team has time to iterate and complete QA before the test starts.

TL;DR

- **Content & Design:** Based on the feedback, we have replaced the breathing video with a full screen takeover that encourages the user to close IG and shares 4 lightweight tips for taking breaks off the app. The proposed layout has been reviewed and approved by IGDS. Experts and teen ambassadors also shared feedback that they found the nudge and tips helpful.
- **Test Details:** We are testing Take a Break in 6 EN countries (UK/IE after IPDC approval), starting with iOS first and followed by Android in ~3 weeks. We are requesting 3% exposure for 2 trigger variants — 10 min and 20 min app session lengths — before showing the upsell in Explore chaining surface. Across all teens, max exposure to treatment is 0.34%. **Please see details on rationale, experience, and test plan below.**

Product-Specific Goals

The primary objective of Take a Break is to provide a moment of interruption that prompts teens to close Instagram and take a break at intervals of their choosing.

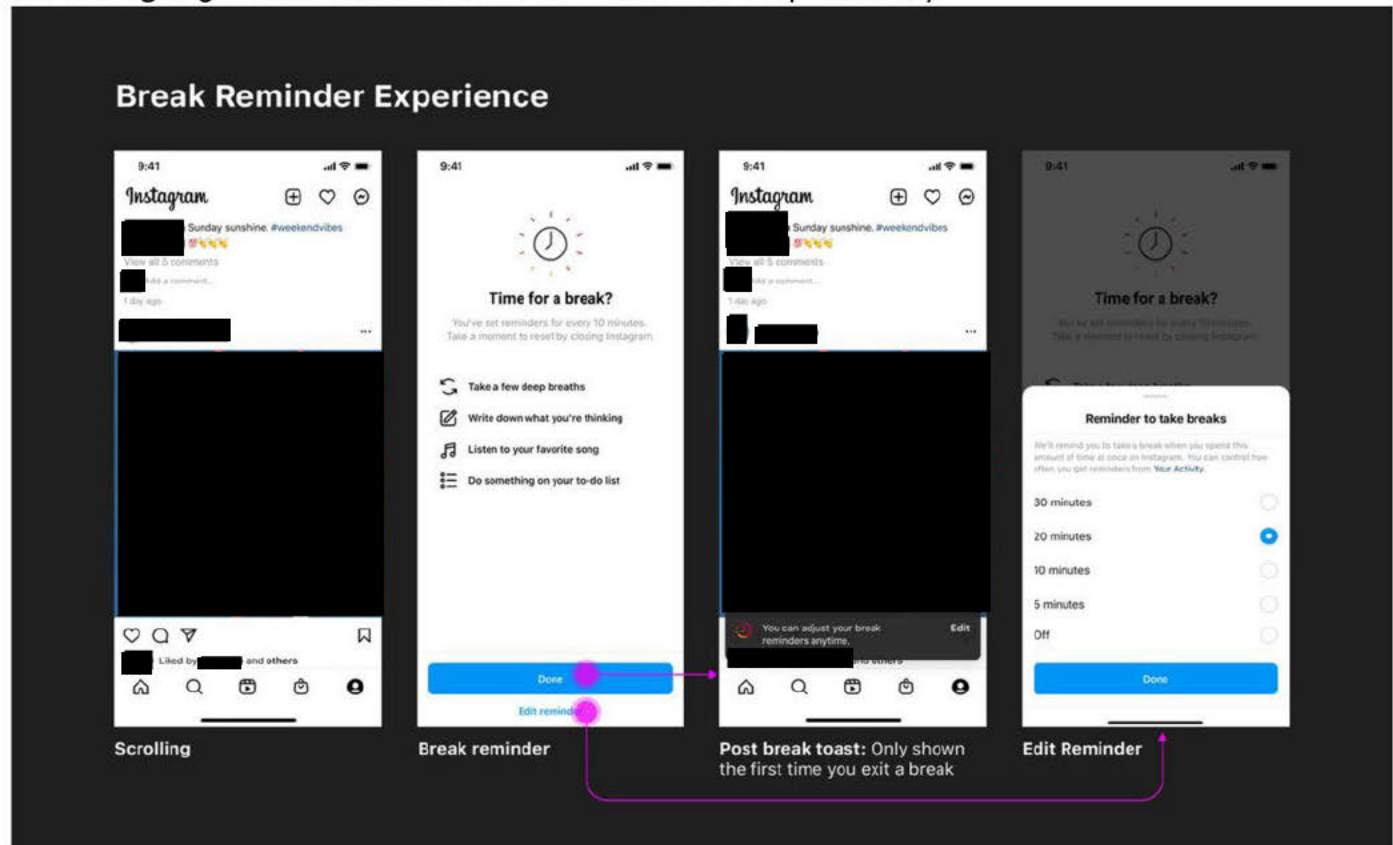
Our tests goals are to (1) see how the upsell nudge helps drive awareness of the “break reminder” control (2) see meaningful usage over funnel from upsell to control opt-in to actually taking the break (3) balance ecosystem effects (detailed launch criteria shared and aligned over email yesterday) by evaluating the two trigger variants.

Product Design Details

We are pursuing the “full screen take over with tips” approach agreed upon late last week ([Figma board](#) & mocks below).

Note: Content and designs reflect our final recommendation except the first icon in the list (we

are waiting to get a new icon from IGDS for “Take a few deep breaths”).



Experiment Details

- **Experience:** When teens have spent a relatively long time on the app and start chaining in Explore, encourage them to set up break reminders for regular intervals. If they set up the control, remind them to take a break after they have spent X amount of time (selected by them) in a session.
- **Variants:** 2 total — 10- and 20-minute app sessions (nudge will appear on Explore chaining). As a reminder, here is the trigger [decision slide](#) aligned on with IG leads.
- **Test dates:** 11/1 is the earliest to enable public access. We will be at full 3% on 11/9, and test will run for 3 weeks (over Nov code freeze). Prelim data will be reviewed on 11/11; experiment review and launch decision will be made on 11/30.
- **Launch date:** Team is aiming for launch in December during Production Yellow Zone. We will need Org leads and Explore leads approval to launch between 12/1 - 12/17; tentative launch date is 12/7.

Test Targeting

	Take a Break
Targeting	All teens (based on stated age)
Countries	US, CA, GB, NZ, AU, IE (Waiting for IPDC approval)
Overall test exposure %	3%
Max % of teens expected to see experience	0.34%

For context, 3% exposure is required to:

1. Identify most effective variants based on stat-sig differences in adoption rates
2. Have the option of analyzing adoption by gender or other core dimensions
3. Include a buffer for any over estimations given cool downs or forecast assumptions.

Test Measurement (Same as what was shared in the dedicated email review thread for success criteria)

- **Launch Metrics:** (1) Upsell adoption rate (% of users that set and kept a reminder) $\geq 0.5\%$ (2) Upsell dismissal rate (% of users that dismiss upsell and never set a reminder) $\leq 20\%$
- **Guardrail/Counter Metrics:** (1) Time spent: regressions $< 0.2\%$ (2) Sessions: regressions $< 0.2\%$ (3) Creator watch time: regressions $< 0.5\%$
- **Secondary/Understands Metrics:** (1) Break reminder CTR (2) Break reminder dismissal rate (3) Take a break exercise completion rate

Please let us know if there are any questions/concerns.

Thanks,
MWB Team

[illegible]

Hi Miki,

Correct!

We will cover our plan and progress on estimating improvements in user reported feelings of NAC in the measurement review on 11/4 (next step #3).

Best,

From: Miki Rothschild [REDACTED]
Date: Wednesday, October 20, 2021 at 8:57 PM
To: [REDACTED], IG_Well-being_Leads [REDACTED]
[REDACTED]
Cc: IGWB Support Leads [REDACTED] Shruti Bhutada [REDACTED]
[REDACTED] Shilpa Mody [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED], Justin Cheng [REDACTED] Moira Burke [REDACTED]

[REDACTED]
Dayna Geldwert

[REDACTED]
Liza Crenshaw

Subject: Re: [Reminder; Need approval by 10/22][Email Review] MWB H2 Product Success Criteria

Hey, this seems reasonable to me. I think what we're saying is that we want to guard against any ecosystem/engagement metrics that imply we're hurting the user experience and that we'll rely on research to indicate the upside, but not hold ourselves to measurable upside (improvements in user reported feeling of NAC) since we don't yet have a great way to measure that in a test setting. Is that right?

Ideally over time we'd want to have a way to measure the Well-being improvement but I recognize it's complex operationally.

From: [REDACTED]

Date: Wednesday, October 20, 2021 at 4:31 PM

To: IG_Well-being_Leads [REDACTED]

Cc: IGWB Support Leads [REDACTED]

[REDACTED] Shruti Bhutada

[REDACTED], Shilpa Mody

[REDACTED] Justin Cheng

[REDACTED] Moira Burke

[REDACTED] Dayna Geldwert

[REDACTED] Liza Crenshaw

Subject: [Reminder; Need approval by 10/22][Email Review] MWB H2 Product Success Criteria

Hi Miki,

Gentle reminder to review our success criteria proposal for the two P0 tests for this half: Alt Topic Nudge and Take a Break Upsell (please see email below). For context, once we have the approval from you, our next steps are:

1. Email review with IG Leads on the success criteria (ETA: 10/26).
2. Align with surface teams on the success criteria defined in terms of their critical guardrails and follow up with test results (ETA: 11/8).
3. Review the measurement plan for NAC overall (ETA: 11/4).

Please let us know if there are any questions or concerns.

Thanks,
MWB Team

From: [REDACTED]

Date: Friday, October 15, 2021 at 5:44 PM

To: IG_Well-being_Leads [REDACTED]

Cc: IGWB Support Leads [REDACTED]

[REDACTED] Shruti Bhutada

[REDACTED] Shilpa Mody

[REDACTED]
 [REDACTED] Justin Cheng [REDACTED] Moira Burke
 [REDACTED] Dayna Geldwert [REDACTED] Liza Crenshaw [REDACTED]
 [REDACTED]

Subject: [Email Review] MWB H2 Product Success Criteria

Hi Miki and WB Leads,

We are writing to share and align on our success criteria for the two P0 tests for this half: Alt Topic Nudge and Take a Break. With both of these, we're primarily focusing on the nudge / upsell experiences that are higher reach (0.51% of teens for Alt Topic and 0.34% for Take a Break), since this is where we get the most test signal and where the bar is highest.

Reminder of the team mission, which motivates why we're doing these H2 tests: *"Help teens become self-aware to take control over experiences that make them feel bad about themselves, and reduce these experiences on the platform overall."*

Specifically the product impact we're looking for here is behavioral signal for awareness and control.

The launch criteria are:

1. **See that we're helping people.** At this early stage, we're simply looking for signals that these products are valuable and are built on strategies that are either evidence based or grounded in user research. We're looking to hit a bar, not maximize this.
2. **See meaningful usage over funnel.** Given that those who need solutions the most are a pretty small group, we're looking for usage comparable to other well-being experiences with upsells and don't want to see upsell dismiss rates that are much higher than benchmarks.
3. **Balance ecosystem effects.** The balance between the known upside of the solution and changes to ecosystem usage metrics. We'd expect some level of effect if there's material usage.
4. **Complements external narrative.** This is a judgement call that the product and business workstreams for proactive public comms complement each other in a clearly explainable way.

We recommend prioritizing our analysis of experiment data on #3. This is where we have multiple test variants so that we can see changes in effects as the upsell/nudges triggers are broader vs. narrower (reminder: in all cases [the triggers](#) are general for all teens).

For #1, we've already seen:

- User research suggests that interruptions could help with pulling users out of downward emotional spirals, especially when they are unable to recognize how the content they see is making them feel or unable to mitigate NAC experiences.

For #2, benchmarks are:

- Nudge / upsell CTR $\geq$ 0.5%
- Nudge / upsell dismiss rate $\leq$ 20%

(Benchmarks are based on comparing with Update Following, Daisy controls, and voter registration.)

For #3, we will:

- Disregard variants with material ecosystem regressions:
 - Time spent: regressions $<$ 0.2%
 - Sessions: regressions $<$ 0.2%

- Creator watch time: regressions < 0.5%
- Balance ecosystem effects:
 - If there are multiple variants at this point, then our choice of the best variant prioritizes trading off big reductions in ecosystem regressions for small reductions in adoption.

Since #3 is the main analysis focus, we'll separately review a more detailed analysis plan with the related surface teams (pre-reorg, these were in Discovery and F&R).

At this time, we don't expect to use surveys or Negative Appearance Comparison-specific metrics in the launch criteria. We'll follow up with a deeper review of Negative Appearance Comparison-specific metrics so that we can move towards using more specific impact metrics for 2022 launch decisions.

The Alt Topic Nudge test is starting this week and we'll have initial analysis in late October. For Take a Break, the timing for analysis depends on the test start date, which [per the WB review yesterday](#) depends on deciding on an experience option.

Thanks,
MWB Team