

AMENDED Exhibit 279

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

of a map / decision tree to understand how/when decisions to join/not-join are formed and which factors/perceptions influence these decisions + when/how they are formed and how easily they are movable. Plus we need to size everything. I know it sounds like a massive project, but I do agree with @Junia and @Darius that we have to go into details/precisions more this year.

Darius Kilstein (3/02/2023 10:00:17 PST):
>This is what i'd like to know :)

██████████ (3/02/2023 10:03:23 PST):
>this is something our fieldwork in London, Barcelona, and Seoul may be able to speak to

Darius Kilstein (3/02/2023 10:08:14 PST):
>Awesome, i'd love to be able to quantify it via survey if possible - though i understand it may be hard to get teens to admit they don't listen to their parents so maybe i'm dreaming :)

██████████ (3/02/2023 10:09:04 PST):
>We're planning to follow up this qual fieldwork with a survey so perhaps that's something we could work in!

██████████ (3/02/2023 10:12:57 PST):
>It would be so interesting to do some dyadic parent-teen research...and actually see how much of this is teen perceptions of what parents think vs. really driven by parents themselves. maybe we already do stuff like this though?

██████████ (3/02/2023 10:34:31 PST):
>One flag for folks is that we have to be extra careful when conducting research to avoid conversations that highlight <13 yo with IG accounts. I'm seeing some of these questions, particularly around the impact of parent sentiment to teen usage and engagement flirting with that line. This isn't to say to not do this research but just know there will likely be a fair amount of PXXN pushback, which I'm happy to navigate alongside ya'll.

██████████ (3/02/2023 10:45:27 PST):
██████████ has done parent-teen research (diaries / qual) and has a parent & teen community coming up that we can use for future research questions. I'll let ██████████ jump in with anything relevant from the teen-parent learnings from Supervision.

██████████ (3/02/2023 11:14:09 PST):
██████████ is spot on. The main contributor is whether the responses are from parents of IG non-users or all parents. If we limit the sample of respondents to IG never users, it's almost mechanically going to be true that gatekeeping will be biased upward for IG compared to other apps.

>
>Here's a relevant slide. Note that there are still some differences between the two charts. A couple reasons for the difference to keep in mind

>
>1) the blue chart is from a nationally represented survey based on a probabilistic sample design (address-based sampling), and data is weighted (vs the pink chart is based on unweighted data),

>
>2) pink chart are responses from parents, while blue chart are responses from teens.

██████████ (3/02/2023 11:14:10 PST):
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██████████ (3/02/2023 11:14:30 PST):
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██████████ (3/02/2023 14:43:02 PST):
>Alrighty all, the doc's looking like it's in a good place. Aiming to send out tomorrow (let's just say 1pm ET) but feel free to flag anything else before then: <https://fburl.com/gdoc/97gaqkcz>

>
>really excited about all the plans, and thanks so much for all the great inputs already :)

██████████ (3/02/2023 15:13:32 PST):
>sorry just catching up on this thread since i've been out on PTO. here's the equivalent graph but for parents of teen ig users. eduardo's data is looking at all smartphone users, whereas i split my data into parents of teen never users of IG and parents of teen IG users.

██████████ (3/02/2023 15:13:33 PST):
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██████████ (3/02/2023 15:55:25 PST):
██████████ and i chatted a while back and concluded that our data is actually equivalent. in both our data sets, ~27-29% of teens (both early AND late teens) who don't use IG cite parents as barriers.

Darius Kilstein (3/02/2023 16:03:05 PST):

>Yeh its kind of all falling into place for me now. The net new factor for me though is that parental sentiment toward teen usage is an equal concern across social media apps (vs something very specific about IG). So if you really want to have an impact on that, you need to show that IG is less of a concern than all the other apps. Which IMO makes the task even harder @silent

Darius Kilstein (3/02/2023 16:04:11 PST):

>Also: <https://www.bbc.com/news/technology-64813981>

(3/02/2023 16:06:36 PST):

>yes, and another critical thing but currently missing piece is how much parental sentiment really matters to teen's decision to join IG. In a world where IG perfectly meet all the needs that teens have, and better than our competitors, is that enough to motivate them to persuade parents so they can join IG?

(3/02/2023 16:07:40 PST):

>thanks [REDACTED] one ask: if you weren't already planning on it, can you please also include [REDACTED] & [REDACTED] on the update with the plan? will help close a few open conversations that are happening & help get everyone on the same page of what's coming up.

(3/02/2023 16:09:58 PST):

>As I understand parental gatekeeping is much larger for 13yo - should we focus more on 14-17? Do we have data that shows that if 13yo don't start using IG - it is much harder to get them excited to join IG at 14+?

(3/02/2023 16:11:34 PST):

[REDACTED] has a slide on this I believe! TL;DR is that it's important to acquire them early on

Darius Kilstein (3/02/2023 16:12:02 PST):

>Ideally in our research we can do cuts by age for all ages IMO.

>

>What we learnt from FB teen declines is that each incoming year is worse than the last - so to some extent, what you are saying is probably true in reality (i.e. if you dont join when you are 13 you are much less likely to do so when you are 14)

(3/02/2023 16:20:36 PST):

>Yep. And from research perspective, we want to acquire teens as early as possible to mitigate the barrier due to 'friends not on IG'.

(3/02/2023 16:26:35 PST):

>yes agreed. i think Eduardo's data helps illustrate that new layer. @silent

(3/02/2023 16:28:30 PST):

>And here is the slide that Yuqian refered to -- users who joined at an earlier age tended to retain much better on IG:

https://docs.google.com/presentation/d/1AMCT2Rs3l4bJzbUiSqVTQWAE4lBpJVNPd9IMSosxt94/edit#slide=id.g13fae8c96b1_0_8

(3/02/2023 16:29:32 PST):

>#shareadoc

(3/02/2023 16:45:56 PST):

>yes i think an important thing to highlight is that 65% of teen never users in the US had 2 or more barriers to joining. i also did a cluster analysis to look at what barriers tend to get selected together (see below with different colors representing different clusters).

>

>one takeaway i had from this is that we may want to think about how to tackle different clusters (rather than just single barriers).

(3/02/2023 16:46:00 PST):

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(3/02/2023 17:17:27 PST):

>ok here are a few quick thoughts after reading thru this chain & reviewing the understand plan:

>1. is there any prior work from marketing insights on what campaigns/messaging is most effective at acquiring different segments of teens? this might be a signal we could leverage to get at value props and the "pull" onto the app.

>

>2. since friends are a key pull to use apps, i think we should really dig into this area. one thing that i haven't heard talked about is WHICH teens influence their friends to start using an app. in many friend groups there is someone who often influences others (due to social status or dynamics of the group). if we identified these key "influencers" within teen non-users, this could help pull the rest of the non-users onto the app.

>

>3. the influence of parents and friends shifts as teens move thru adolescence. can we size how much teens care about their parents, siblings, and friends thoughts on apps and which would be the best lever at different ages and with different segments?

(3/02/2023 19:44:35 PST):

>in terms of digging deeper/getting more precision, i did ask teen never users who had selected more than one barrier: "what is the main reason you have not created an Instagram account?" and then, I had an open-ended followup: "Please tell us more about why this is the main reason you haven't created an Instagram account: {top_ig_barrier}"

>
>so i think there is an opportunity to read thru these responses to get more color/depth. at the time, i didn't have capacity to read and code all of the responses since i was on a short timeline.

>
>i also asked: "What do most of your friends think of Instagram?"

- > 1. Love Instagram
- > 2. Like Instagram
- > 3. Neither like nor dislike Instagram
- > 4. Dislike Instagram
- > 5. Hate Instagram

>
>Then I had a follow-up: "Please tell us more about why you think most of your friends "{response from above}." I think this could give us some leads on where to dig in.

Shayli Jimenez (3/02/2023 19:46:59 PST):

>How did the results of that question come out?

>
>Happy to help code/analyze open ends!

[REDACTED] (3/02/2023 20:02:26 PST):

>well here are the charts i made to show how frequently ppl selected a reasons crossed with how often it is selected as the main barrier.

>
>i think it's important to think about both dimensions when we are thinking about barriers (not just frequency). @silent

[REDACTED] (3/02/2023 20:02:29 PST):

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[REDACTED] (3/02/2023 20:03:55 PST):

>here are some example open-ended responses for "my parents are not ok with me using IG" @silent

[REDACTED] (3/02/2023 20:03:58 PST):

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[REDACTED] (3/02/2023 20:05:12 PST):

>here s the friend favorability results. there are all in my original deck:
<https://fb.workplace.com/groups/568604604067480/permalink/987994292128507/>) @silent

[REDACTED] (3/02/2023 20:05:15 PST):

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[REDACTED] (3/02/2023 22:32:10 PST):

>@silent let's code those! #year1fefficiency

[REDACTED] (3/02/2023 22:33:42 PST):

>This interpretation makes sense and aligns with what we already know about privacy concerns:

>
>[https://fb.m.workplace.com/notes/\[REDACTED\]/the-prevalence-of-privacy-concerns-is-similar-across-fb-and-non-fb-apps/509458769750442/](https://fb.m.workplace.com/notes/[REDACTED]/the-prevalence-of-privacy-concerns-is-similar-across-fb-and-non-fb-apps/509458769750442/)

[REDACTED] (3/02/2023 22:56:13 PST):

>coding party!! @silent