

AMENDED Exhibit 28

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

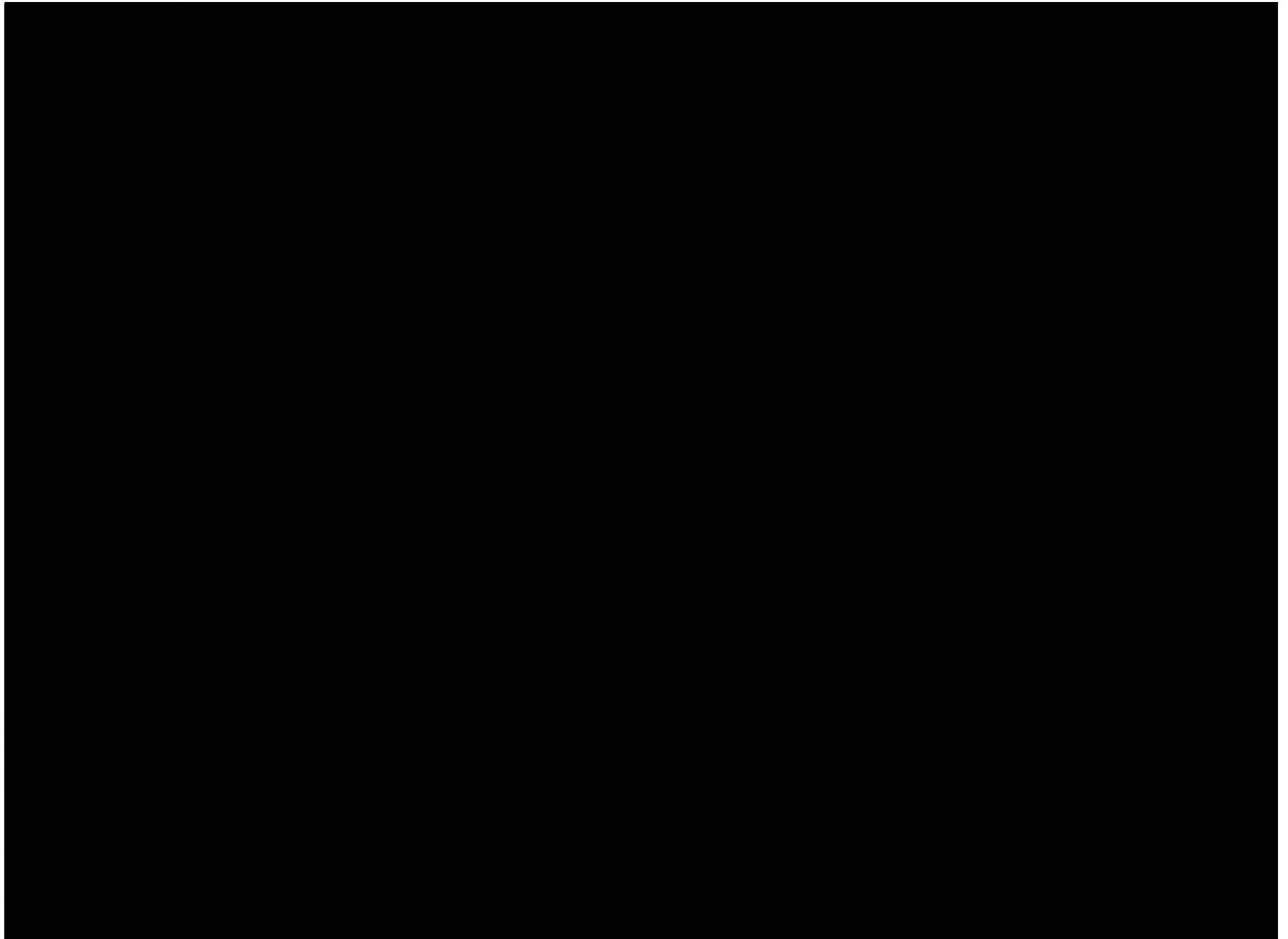


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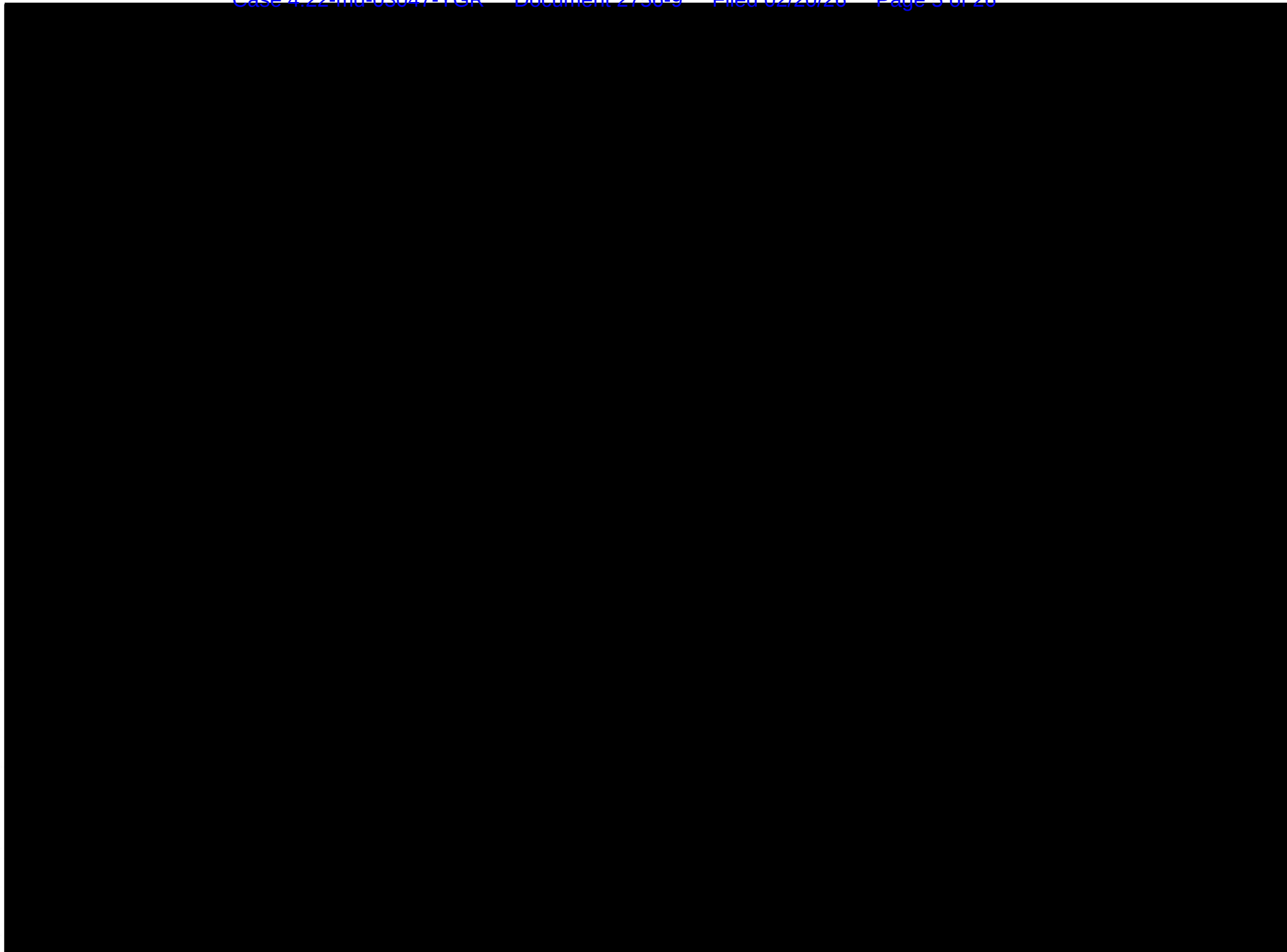
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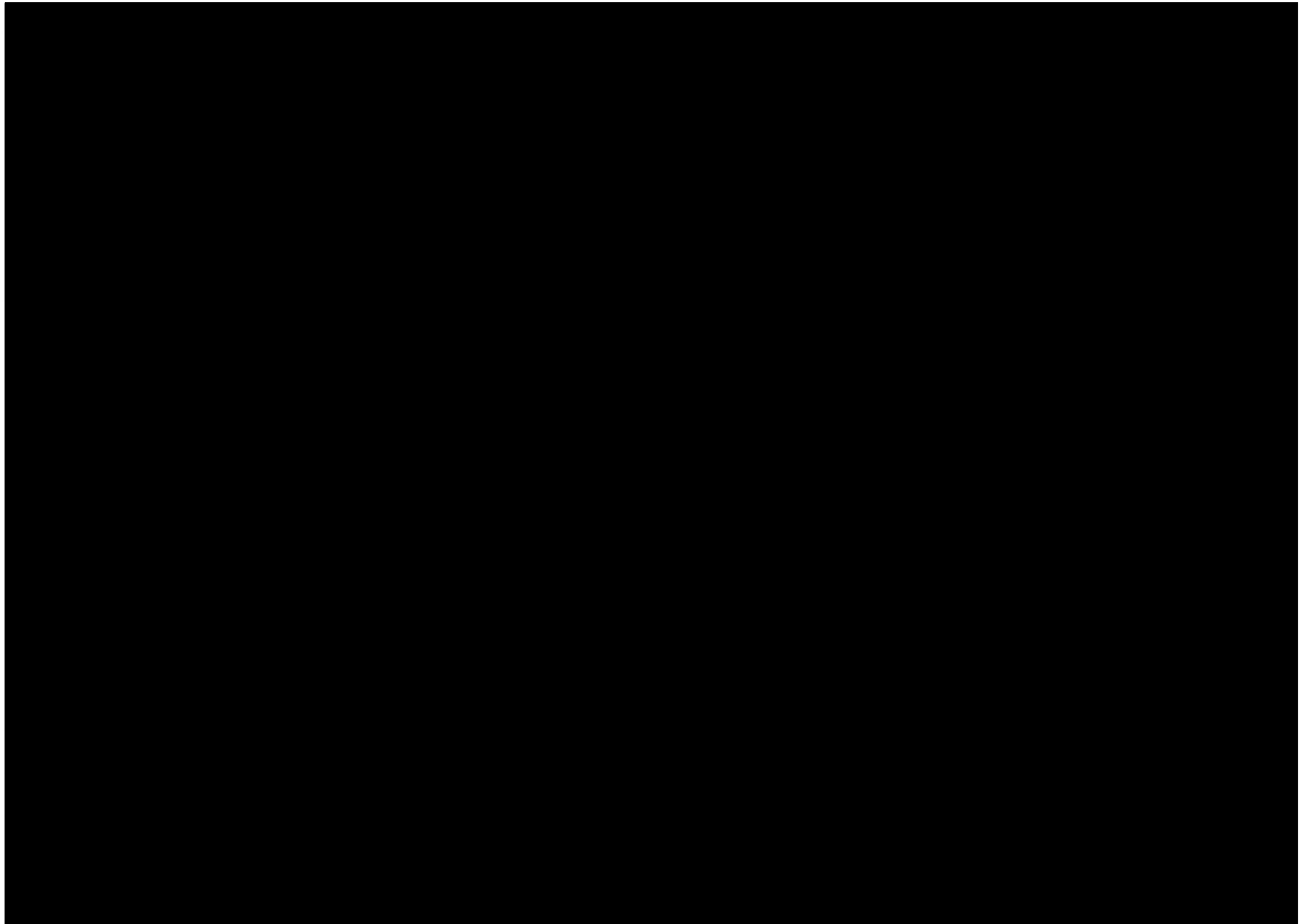
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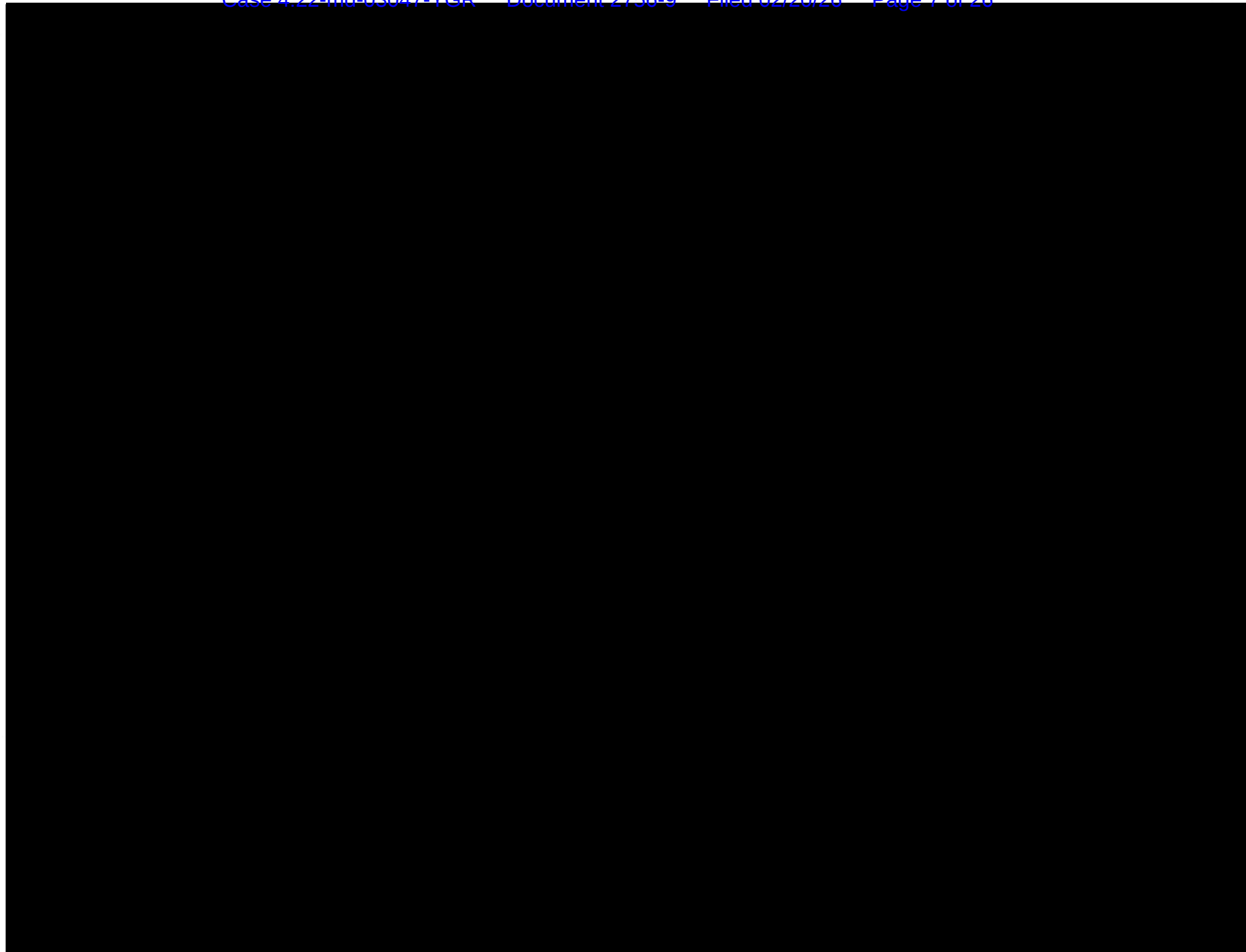
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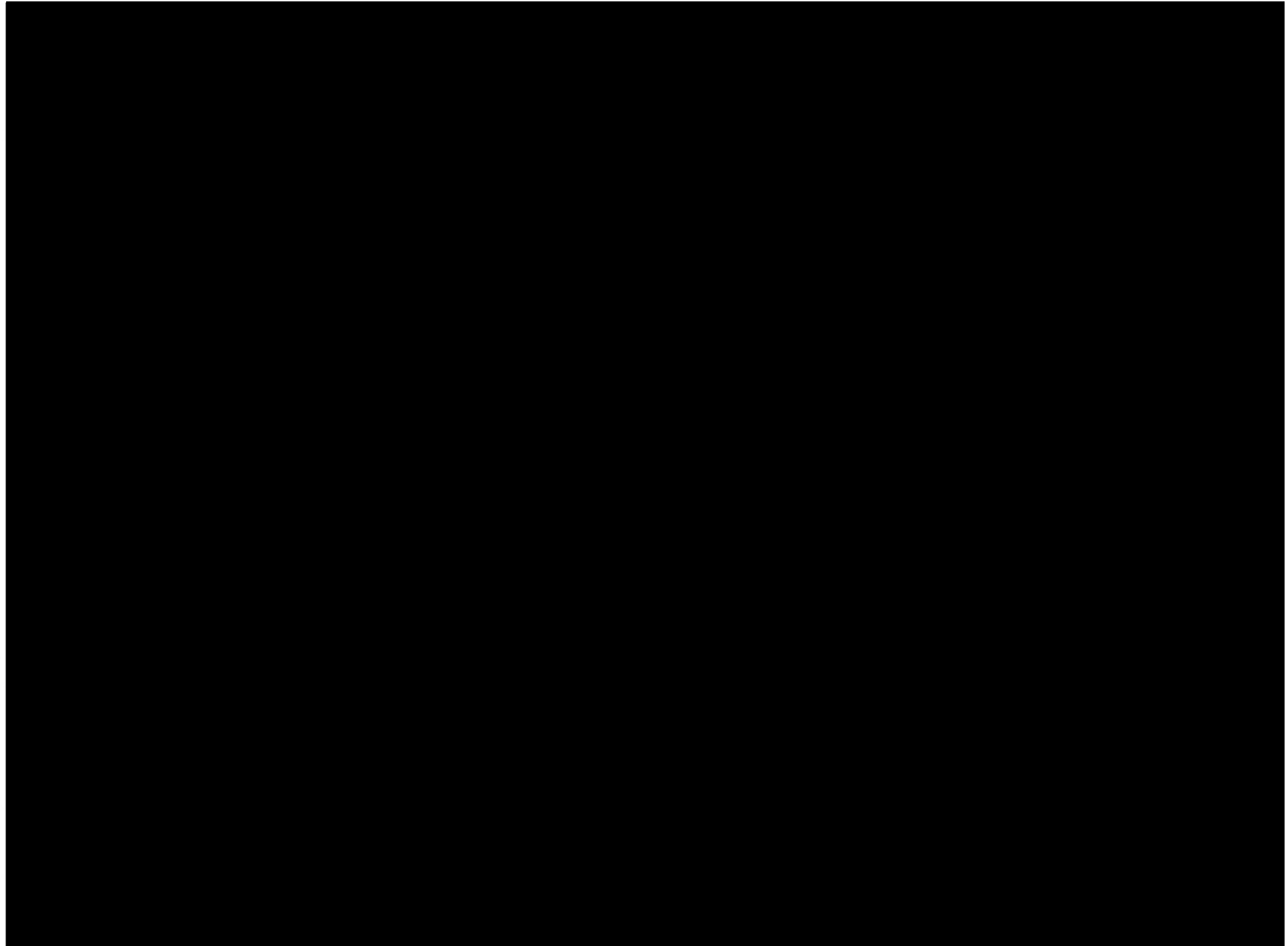
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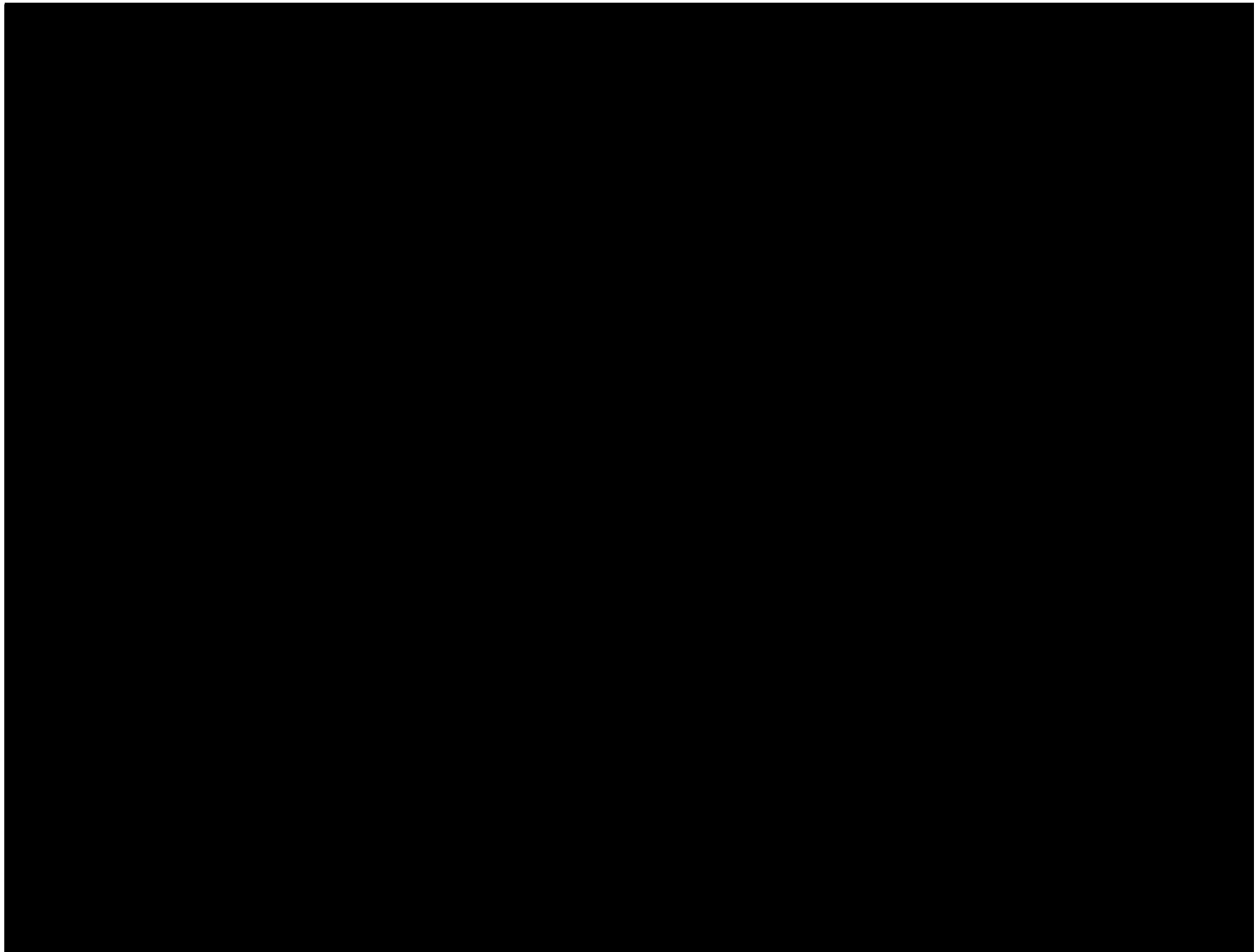
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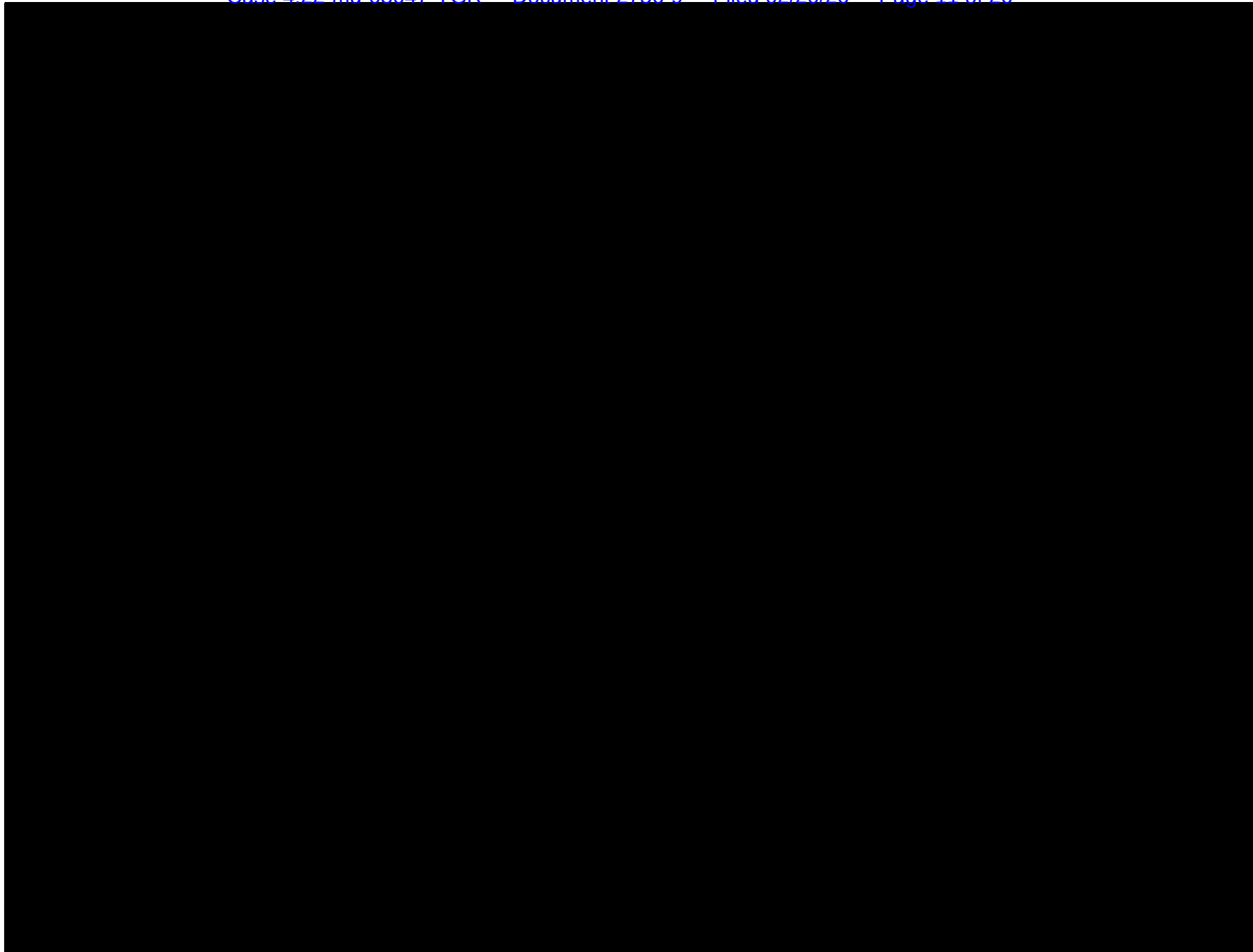
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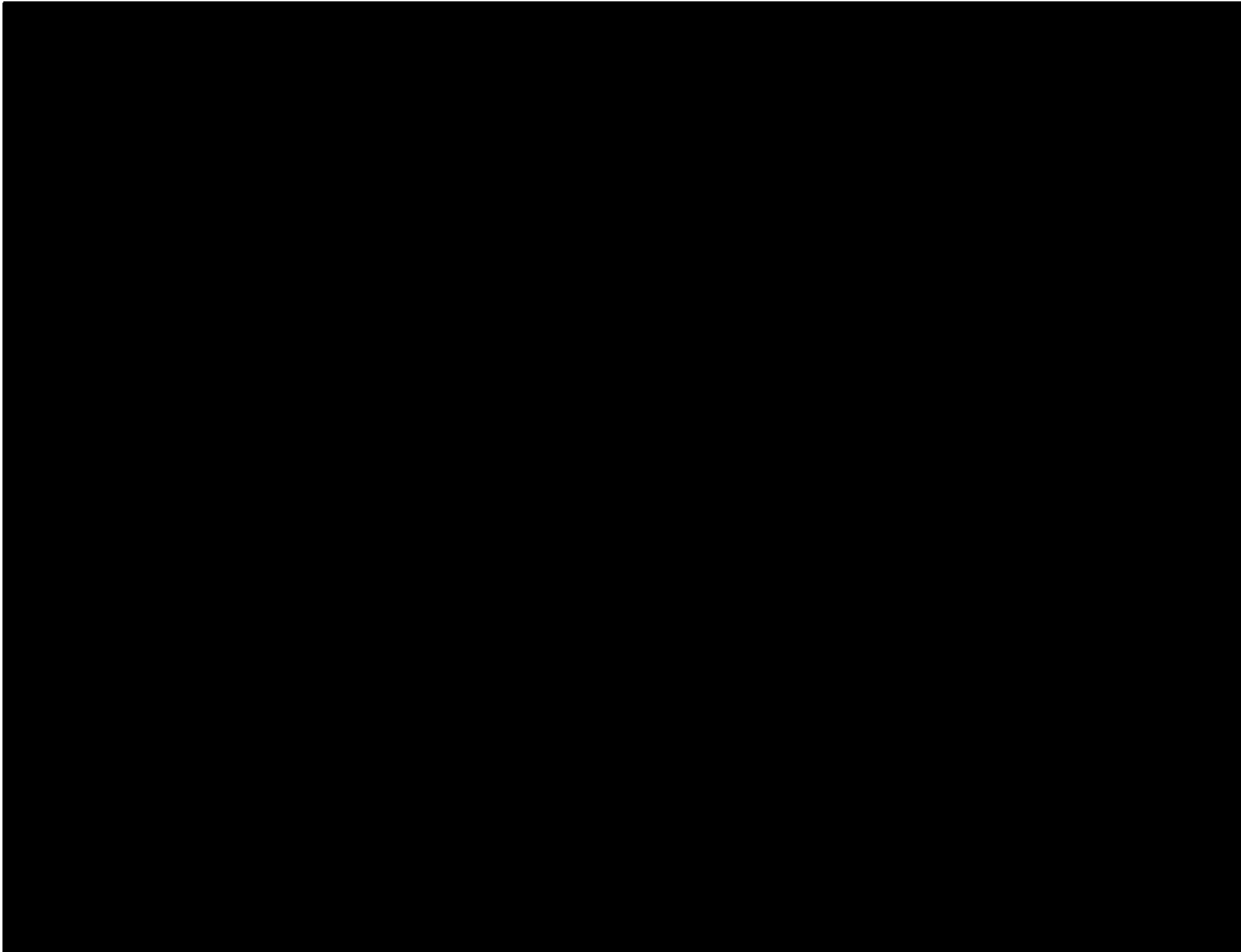
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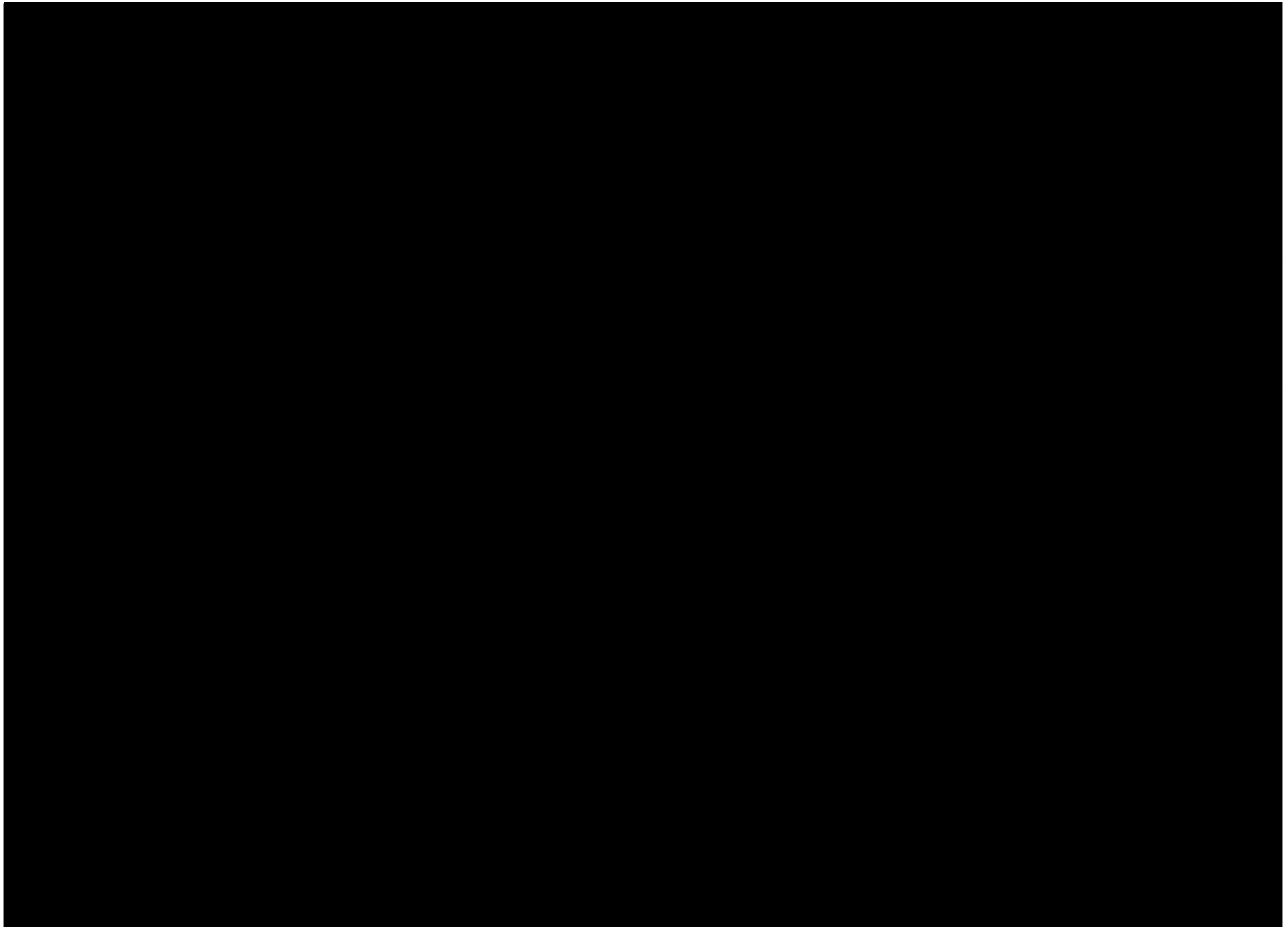
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H2 STRATEGY

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EXPLORE MISSION

**Our mission is to strengthen
relationships to
and through interests.**

We do this by giving people instant access to engaging content about their existing interests, while helping them discover new interests through friends and what's

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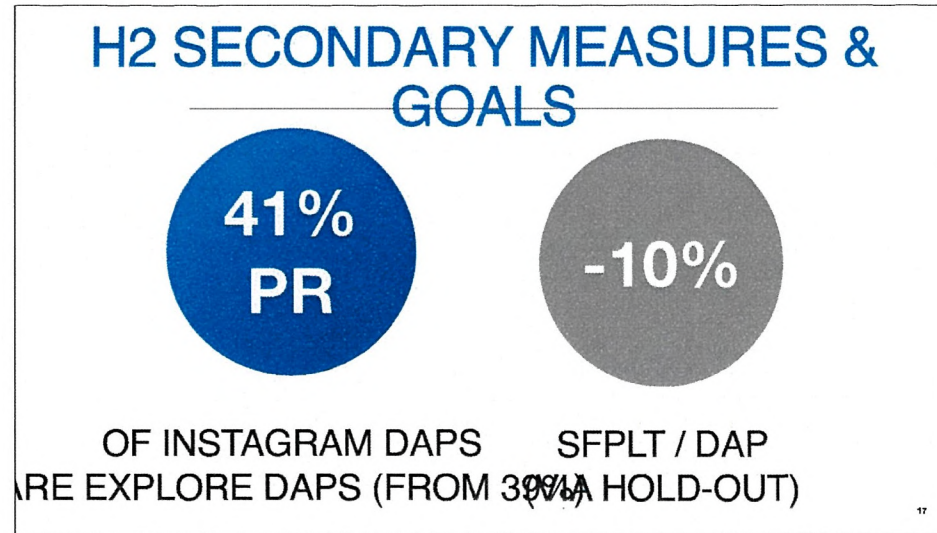
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H2 THEMES

1. Place a big bet on video, re-inventing Explore (30%)
2. Make post recommendations awesome, especially for new users (30%)
3. Introduce post-chaining, letting people dive deep (25%)
4. Help people keep up with “what’s happening” through multi-author stories (15%)

18

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FEEDBACK & ASKS FROM ENGAGEMENT LEADS

- Be bold: Don't be incremental. Success is re-inventing ourselves, specifically through video.
- Invest in US Teens: US Teen DAP is the most important goal for IG this half. Explore is uniquely positioned to help, through video products and sourcing / ranking.
- Don't feel pressured to build for everyone: On that note, we are too big to build products that work for everyone, everywhere. We won't advance if we try to, so we must build for a cohort (teens) and define alternative "fallbacks" for others.
- Fix the new user experience: Leverage Explore as a

19

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H2 ROADMAP & “NORTHSTAR” DESIGN

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1. PLACE A BIG BET ON VIDEO

PROBLEM TO SOLVE

"It's hard to find interesting videos on Instagram when I'm in the mood to watch them; I have to hunt and peck."

SOLUTIONS

- Mini video home
- New viewer
- Make VYML awesome
- More channels & ranking
- Auto play in grid
- Push notifications at night
- Performance

Internal team challenge!

Be 50% of IG Video TS by end of H2.

21

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2. MAKE POSTS RELIABLY REFLECT EACH USER'S EXISTING, DIVERSE

PROBLEMS TO SOLVE

- "Explore takes a long time to learn all my interests."
- "Bad balance of short and long term interests."
- "Can't say what I want to see."
- "I don't 'like' Posts."

SOLUTIONS

- NUX (follows, topic selector)
- Encourage feedback (posts in feed, tune up, social context)
- Sourcing & ranking for interests, new users, teens, video



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3. INTRODUCE POST- PROBLEMS TO SOLVE

- "I have to hunt and peck to find the topic I'm in the mood for."
- "It shows too much from one topic."

SOLUTIONS

- Post chaining, including video only chains
- New nav
- ISFY

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4. HELP PEOPLE KEEP UP

PROBLEMS TO SOLVE

- "It's hard for me to see what's happening on IG; I have to piece it together"
- Trending MAS
- Personalized (Friends' location)
- Cross-ranking & media ranking
- Support Stories Home
- Push notifications
- Performance

SOLUTIONS

SCA

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AND IF YOU REMEMBER
NOTHING ELSE FROM

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3 THINGS TO REMEMBER FOR H2

- **Video:** Let's re-invent Explore as the home for video on IG
- **New Users:** Let's finally fix their experience once and for all
- **Teens:** Let's always build and prioritize with them in mind

26

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