

AMENDED Exhibit 295

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

← Exploring playdates as a growth lever for Messenger Kids (Findings from the MK Community)

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Exploring playdates as a growth lever for Messenger Kids (Findings from the MK Community)

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As we plan for H2 and kick off Kid Growth initiatives, our team wants to find ways to help kids talk about the app when they're together. In the past, we've considered playdates as a potential area of opportunity for driving kid activations, and specifically, we want to explore this area further to understand:

- **Are kids are using Messenger Kids during playdates, and if so, how are they using the app and talking about the app?**
- **Who initiates the playdates, and how are they planned/what kinds of activities take place?**
 - **Is there a way to leverage playdates to drive word of hand/growth among kids?**

To better understand how playdates might be an area to drive kid growth, we asked parents of the MK Community about how they initiate and plan, as well as the activities that take place during playdates.

****Researcher's note:** This note is intended to generate ideas and consider how we can leverage playdates to increase growth/retention and active threads. These findings are MK community-specific (active users who routinely provide feedback about the app) and are meant to give us insight into how active users leverage Messenger Kids in the context of initiating and coordinating playdates.

TL;DR:

- Most kids (68% | 65/95) do not use Messenger Kids during playdates, mainly because parents view the app as a way for kids to communicate with others when they're Most kids (68% | 65/95) do not use Messenger Kids during playdates, mainly because parents view the app as a way for kids to communicate with others when they're not together.
 - When kids do use Messenger Kids during playdates, it is mainly to communicate with their parents or with another friend who is not present at the playdate.
 - **Areas of opportunity:**
 - How might we encourage use of MK that fit with parent's existing use cases during playdates [ie, communicate with parents and other friends who aren't there]?

- **The majority of kids (~75%) are initiating playdates and rely on their parents close the loop.**
- Some kids are using Messenger Kids Some kids are using Messenger Kids *prior* to playdates to initiate and tentatively plan playdates and after to talk about what they did during the playdate, and parents are using Messenger/SMS to coordinate them.
- **Areas of opportunity:**
 - How might we help kids who already use the app initiate playdates within MK more effectively?
 - Brainstorm features and/or prompts encouraging use of the app prior and after playdates to improve retention and active threads.
 - How might we help eliminate friction for parents following up and coordinating playdates?
 - To drive parent/kid growth, consider other parent invite XMASs that center on playdates.

Findings

Parents view Messenger Kids as a way for kids to communicate with others when they're not together.

- Many kids (68% | 65/95) do not use Messenger Kids during playdates because parents see playdates as a way for kids to engage in person, and the app is to communicate when they are not with their friends.
 - “My kids usually do not have out any electronics when they have friends over. **Messenger Kids kind of takes the place of contacting and being with friends when they can’t actually be together.**”
 - “We typically do not allow screen time during playdates. **Friend time is to focus on your friends and play together.** Every now and then, if it's a long playdate, we will allow a very short amount of time on an active, engaged video game, like Wii Sports or something. **I would prefer to keep Messenger Kids for communication when they're not already face-to-face with one another.**”
 - “I don’t think they use MK when on a play date. **The kids use it to communicate when they are not together and want to play online with each other.**”
 - “My son does not use Messenger Kids while he is with friends. **He only uses it to get a hold of friends when they are not together.**”
- During playdates, parents prefer to limit or restrict screen time on their kid's devices so that they focus on spending time together playing or participating in outings.
 - “Typically we do **not allow screens when friends are over.**”
 - “No my child does not use messenger kids during play dates **I believed on a playdate station to have more face-to-face activities.**”
 - “*She does not use tablet when real kids are present. They usually play outside,,make crafts or play with toys.*”
 - “I don’t let the kids take their iPads when they go on play dates. **I like them to be present when they are**

- “I try to keep her off of electronics when she has company over unless it is something that they can do together.”
 - **“We try to avoid using screens while friends are over.”**
 - “Sometimes I will allow it but it is limited to certain apps (via parental controls on the phone) so the **focus can be on interacting and playing together, not being absorbed in their phones.**”
 - “Definitely not! **That would defeat the purpose of the play date!!**”
 - “Not really. **I keep my children off electronics during playdates.**”
 - “no electronics when friends are over & **not allowed to take devices to other homes.**”
 - **“I’d rather her not play on her devices when she is at a friend’s or has a friend over anyway.”**
 - “Usually they are not in electronics during play dates.”
 - “We put electronics up when we have company over to play.”
- When kids do use Messenger Kids during playdates (~30%), it is primarily to communicate with their parents or with their other friends not present. Older kids (10 and up) use the app to check in with their parents during playdates, or to coordinate pick-ups.
- “The **only reason Miles would use Messenger during a play date is to reach me or my husband.** Otherwise, he’s not using the app while he’s with friends in person.”
 - “My kids only ever use messenger kids when their with friends when they want to ask me questions or tell me something. **they don’t use it when their with each other..** Too busy playing outside or with toys.”
 - “She doesn’t use her devices during play dates **other than to contact me if she’s away :)**”
 - **“She only uses it when she’s sending me a message on what time to pick her up.”**
 - “My daughter doesn’t really use electronics on playdates. If they are sleeping over **they will bring it to video chat me and say goodnight!**”
 - “MK has been used to make plans for the sleepover, but I’m not sure how much it is used during the sleepover. Although, **last time my daughter spent the night at a friend’s house, she did use MK to send me a couple of pictures, a short video of herself and to tell me goodnight and what time she’d be home the next day.**”
 - “My son does use kids messenger and you tube - **he uses messenger to.inform me where he is and arrival home time.**”
- Kids (primarily 8-9 year olds) are using Messenger kids to communicate with other friends who are not present at the playdate.
- “If my daughter has one of her friends in her group over, **they video chat with another not there.** Especially one who moved far away. It keeps them close.”
 - “Yes sometimes they **message their classmates so they can all talk to each other.**”

- “Once in awhile she will use it. They will talk to **other friends through video chat that are not with them** and take pictures and share them.”
- “Some times they will use messenger when they are not on a play date to play video games so they can talk and plan. Sometimes they do **send videos to their friends who are not there.**”
- “Yes I believe they do to **chat or video chat with other friends not on that playdate.**”

Recommendations/ Questions to consider:

- How might we encourage use of MK during playdates that fit with parent's existing use cases during playdates [ie, communicate with parents]?
- What's the opportunity size for kids using MK to connect with mutual friends not present at the playdate?
 - *Researcher note:* it's worth exploring how often kids use MK during playdates to chat with other friends who aren't present, but I recommend treading lightly with this area. Using MK to communicate with others not present during playdates may be beneficial in some use cases (a friend moved away but they want to see each other) but also consider the potential negative impacts of doing this (generating FOMO, jealousy, feeling left out).

The majority of kids are initiating playdates and rely on their parents close the loop.

- Most kids (~75%) will initiate the playdates by asking their parents to set up a playdate, or tentatively planning a playdate with their friends and notifying their parent(s) to confirm the plans. Parents follow up and coordinate with other parents most often through text/Facebook Messenger.
 - “During the school year, **my daughter initiates most of the invitations.** During school breaks, I set up play-dates in advance with other kids my daughter knows from outside of school. usually via text or via Facebook Messenger.”
 - “Sometimes **my daughter will discuss a play date with her friend at school and then ask me to plan it** with the mom.”
 - “No [using MK during], only to plan a play date.”
 - “My daughter constantly asks me to plan playdates for her, and I do so as often as our schedule allows. I initiate with the friend's mom about half the time. We usually chat about it over messenger or text.”
 - “My daughter usually initiates the want or need to have a friend over or going to their house for the afternoon or overnight. I would either text or FB message the other parent to make sure that it is ok and plan pick up and drop off.”
 - “My 11 year-old initiates the playdate and will come ask me once he knows that his friend is available. Then I usually call or text that child's parent to see if they can come over.”
 - “Just recently, **he started telling me that he made plans and then I need to text the parents to see if their child really is available.**”
 - “My daughter usually talks it over with her friends then asks me to text their mom to confirm all the details.”
 - “If my kids initiate though, they usually bring the idea up to me and then I make the arrangements. However, **my 6 year old has actually utilized Kids Messenger for this purpose!** He was video chatting with

a friend and they started talking about a playdate and me and the other mom made plans through their video chat.”

- “Jaden asks us first **then may use MK to ask his friend** or I text the parent.”
- *“My daughter usually schedules the playdates with her friends at school, then she will come and tell me. I always follow up with the parent or caregiver to finalize arrangements.”*
- “It really goes either way. **Mostly my kids make their tentative plans and then get the confirmation from us** (parents).”
- Older kids, however, have more autonomy in initiating their own hangouts and do not rely on parents to coordinate.
 - “He doesn't do playdates, **he's 13**. He calls or text and says lets meet here.”
 - *“With her age now, she really does the initiating of getting together with friends. There are still a few friends that I need to contact, as the kids don't have phones yet. But most of it is through her.”*
 - “At the age of **11 my daughter sets everything up.**”
 - *“My daughter is 12, so we don't do play dates. If she wants a friend to spend the night, or to spend the night at a friend's house, they usually work it out themselves through MK or texts.”*
 - *“I don't usually schedule them as she is a teenager so they just happen.”*
- Some kids use Messenger KidsSome kids use Messenger Kids *prior* to playdates to initiate and tentatively plan activities.
 - “My kids don't use messenger kids during their playdates. **They use messenger kids before a playdate to plan and after a playdate to talk about new things and share items or ideas they talked about on their playdate.**”
 - “When I said sometimes , I meant **fm [MK] will be used sometimes to initiate the playdate but not during it.**”
 - “My child has never used messenger kids during play dates to my knowledge. **She has however used messenger kids on occasion to initiate a play date!**”
 - “They do however **use MK to arrange play dates.**”
 - “No, **they use MK leading up to the playdate**, but never during the playdate.”
 - “My son has **used messenger kids in the past to plan a playdate** at his aunt's house. He specifically uses the messaging feature.”
 - “If she wants a friend to spend the night, or to spend the night at a friend's house, **they usually work it out themselves through MK or texts.**”
- **Activities for playdates include:**
 - Outdoor activities (jumping on a trampoline, playing Nerf, biking, etc)
 - Free play (Make-believe/pretend-play, playing with toys)

- Arts and crafts (making slime, drawing)
- Playing console games or computer games
- Watching videos/movies
- Making music videos/movies
- Outings (theme parks, museums, beach/local parks, swimming pool)

Recommendations/Questions to consider:

- How might we help kids who already use the app initiate playdates within MK more effectively?
 - Brainstorm features and/or prompts encouraging use of the app prior and after playdates to improve retention and increase active threads.
 - Consider in-app prompts (during summer or weekends) to initiate and plan playdates. (Example: "School's out! How about you ask a friend to plan a playdate this summer?")
 - Tom is working on K2K Summer card to improve retention—perhaps there's a way we can model that feature to be more invite/playdate specific?
 - Consider exploring opportunities to create a feature for kids to send Playdate invites to their friends.
- How might we help eliminate friction for parents following up and coordinating playdates within the Messenger/Messenger Kids ecosystem?
 - Brainstorm ways we can encourage parents to follow up on playdates using Facebook Messenger (example: Facebook messages notifying both parents that their kids want a playdate.
- To drive parent/kid growth, consider other parent invite XMAS that center on playdates (Example: Nadia's child Chloe sent your child an invite to a playdate!")

Appendix:

- [Questions to the community](#)
 - Parents, how do you usually schedule playdates for your child? Do you initiate the invitation, or does your child?
 - What sort of locations do playdates usually take place? What time of day?
 - What is important for you to know about the other kids and their parents prior to scheduling a playdate?
 - Parents, ask your child what they like about playdates, and about what activities they like to do when on a playdate. Please report back in this thread!
 - Does your child ever use Messenger Kids during playdates? If so, please describe! What features is your child using with their friends while in-person together?
- [Data collection](#) spreadsheet

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