

AMENDED Exhibit 298

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

Document Provided in Native Format

Teens EOY 2016

Board Presentation

HEALTH WARNING:

Teen age data is unreliable outside of FB-US.
We are heavily investing to fix this by Jan 2017.

Currently for teens, highly granular data, trends, age-year cohorts, Onavo, and IG + WA data are all suspect.

We believe the following charts are sufficiently correct to draw high-level insights.

We estimate that FBF apps have 32% of global youth smartphone time spent, strongest in developing markets and weakest for iOS in the United States

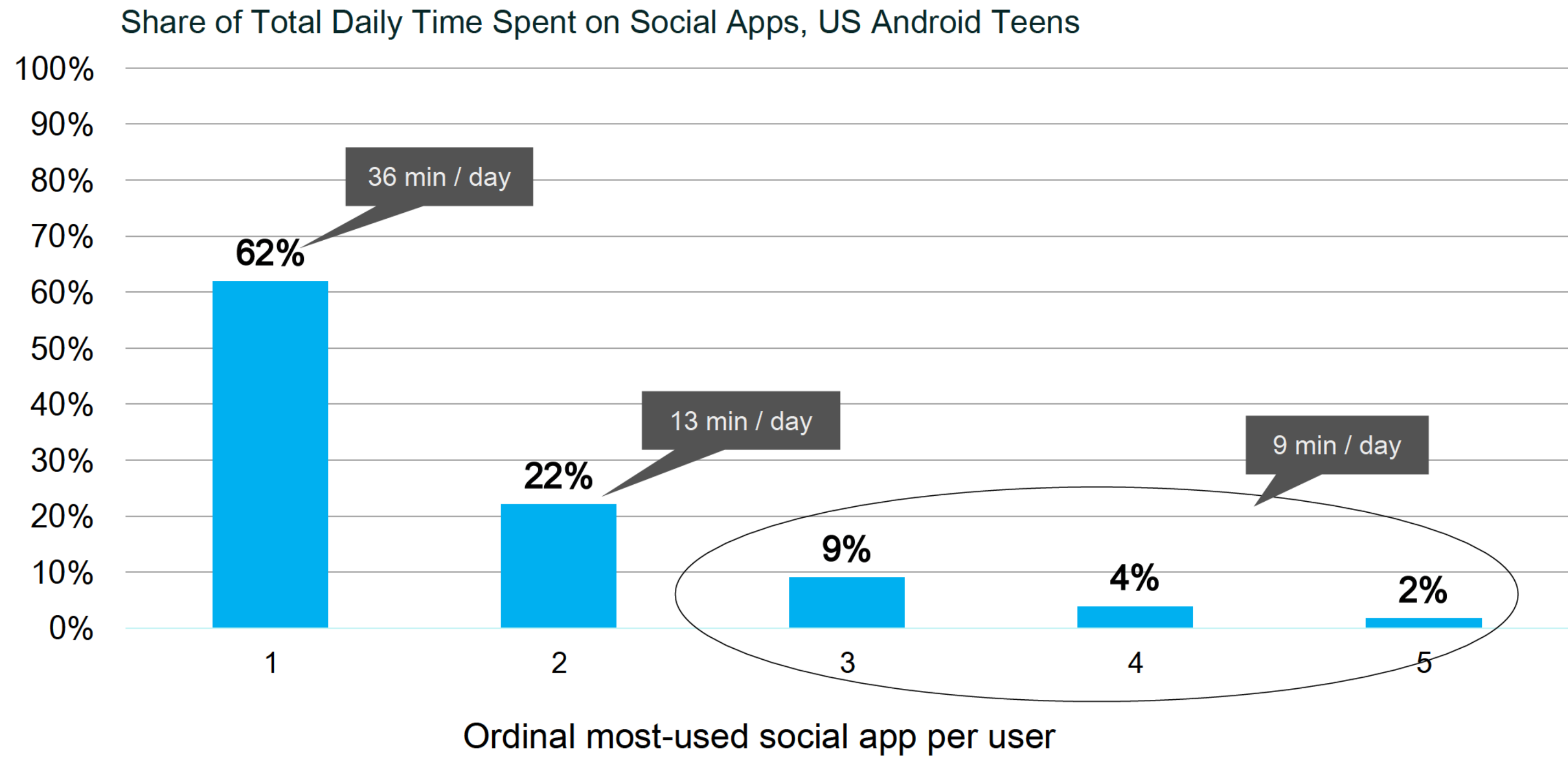
	United States	Western Europe	RoW
Smartphone Daily Hours	23M Android 60M iOS 83M Total	36M Android 40M iOS 76M Total	371M Android 59 M iOS 430M Total
Facebook Inc. Share	25% Android 13% iOS 16% Total	29% Android 28% iOS 29% Total	35% Android 36% iOS 35% Total

Facebook’s 32% share is about three-quarters of all smartphone time spent on social

Use Case	Smartphone Time Spent Share
Social: Broad Sharing	22%
Social: Small Group Sharing	19%
Entertainment: Video	22%
YouTube Only	16%
Entertainment: Gaming	13%
Other	23%
Total (Daily Hours)	100%
Total (Daily Hours)	589M

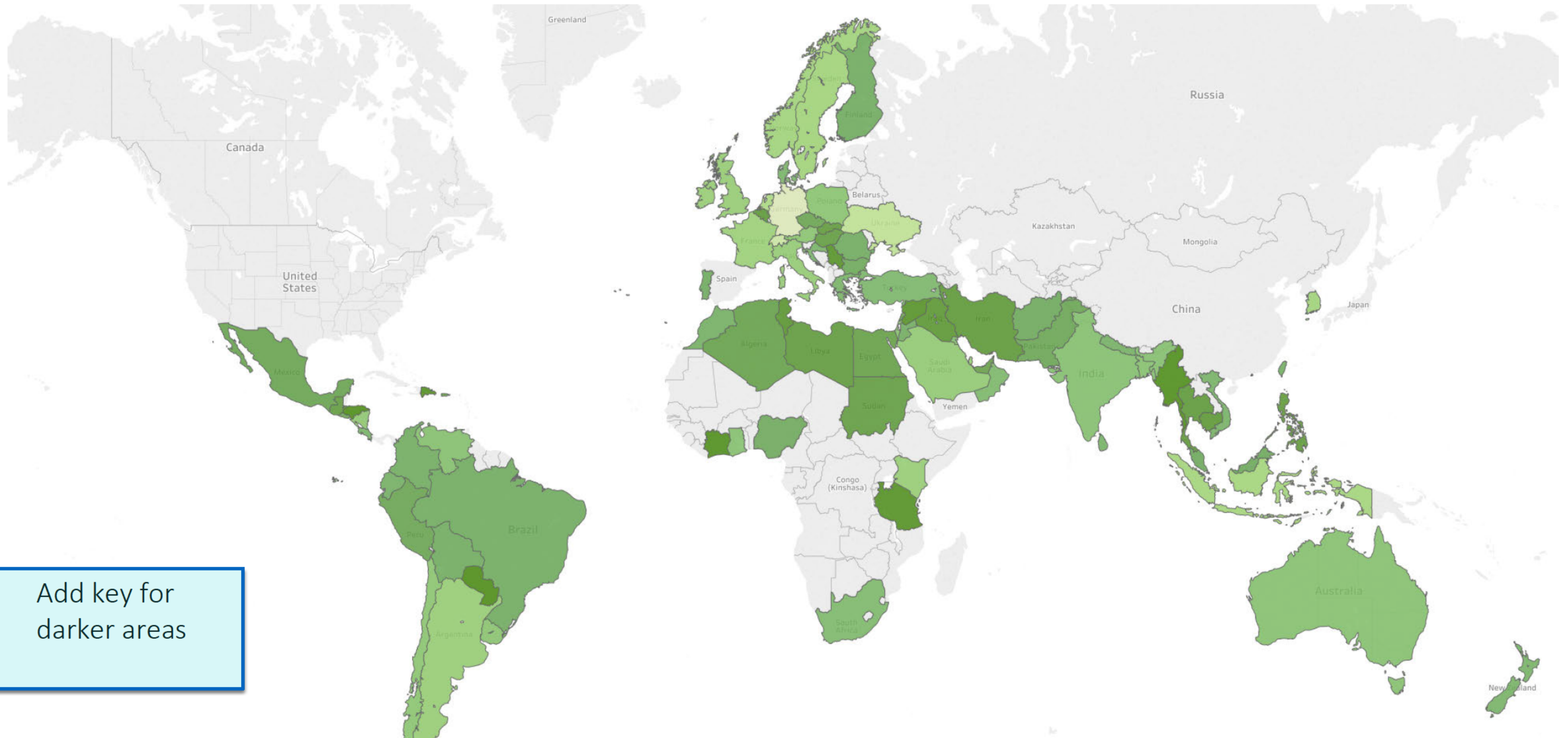
4 **Notes:** (1) Teen: <=18. (2) Smartphone inclusive of iOS and Android. (3) Data from Onavo – absolute numbers may not match internal analytics.
(3) Broad sharing = feed apps like Facebook and Instagram. Small group sharing = messaging and story apps like WA and SC.

Each teen’s #1 social app occupies the majority of their social time spent, but two or more social apps usually have broad reach within a given teen market



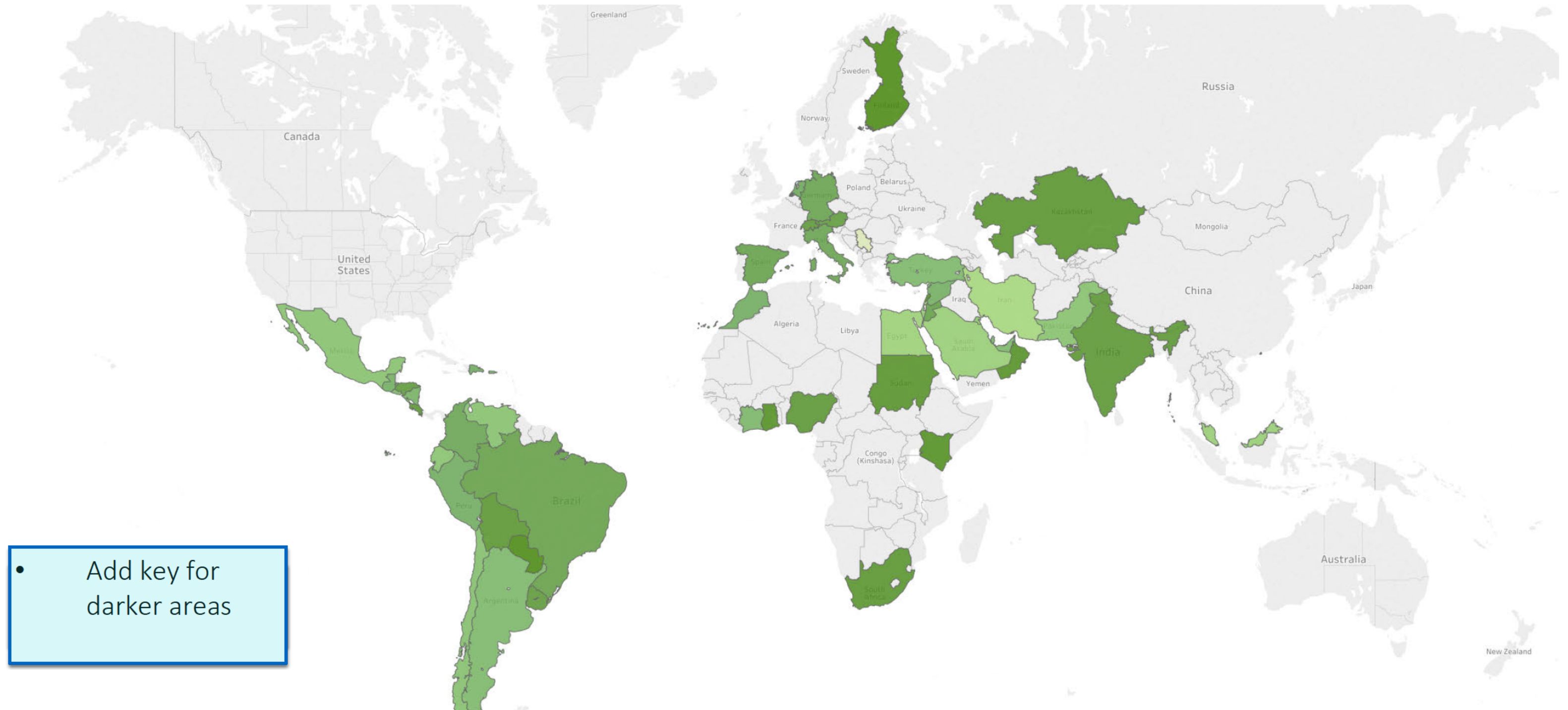
Notes: (1) Data from Onavo – absolute numbers may not match internal analytics.

Facebook's teen saturation, defined as 70%+ 30-day teen reach, now excludes the United States, Canada, and some European countries. LatAm, MENA, and SE Asia are particularly strong

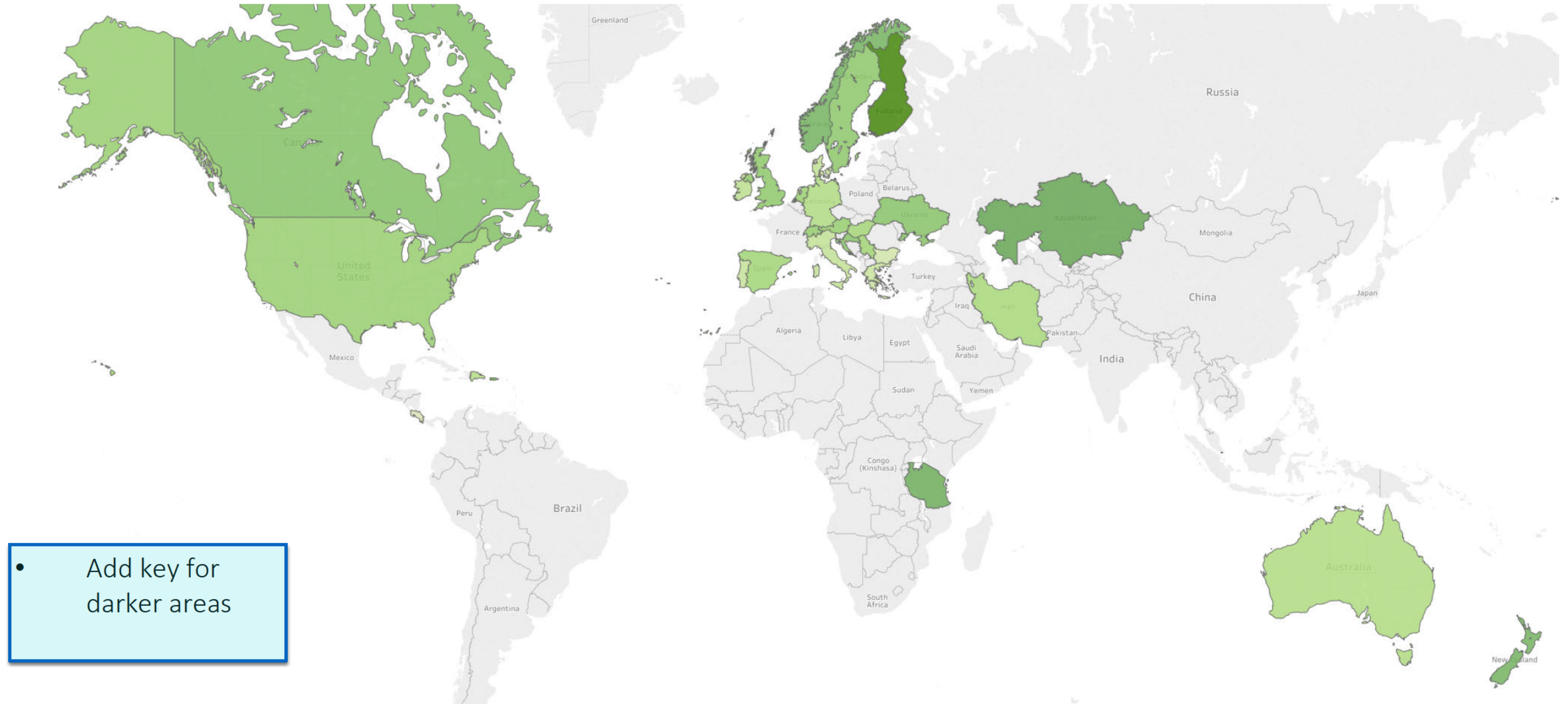


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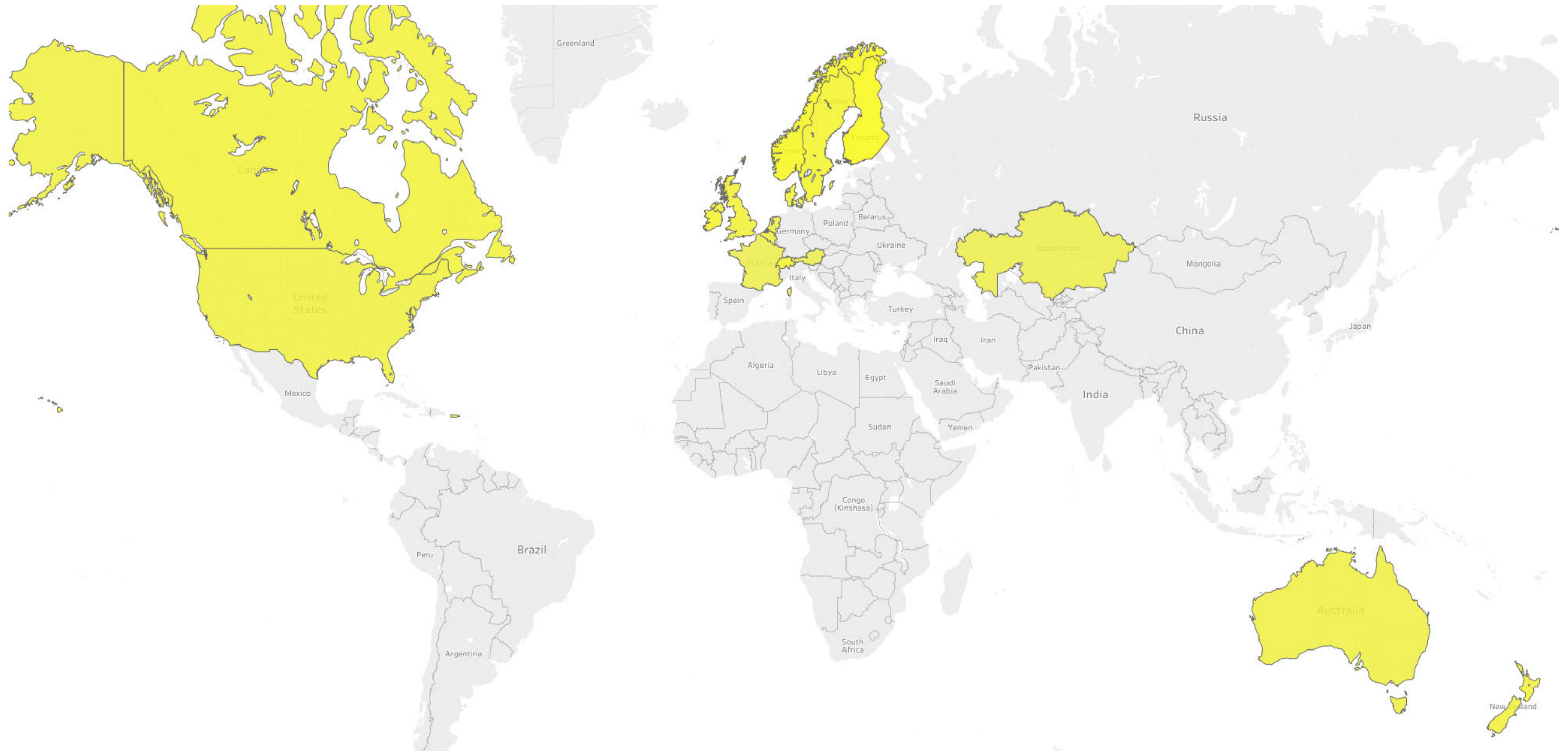
WhatsApp's teen saturation is high in Latam, South Asia, and parts of Europe



Instagram is the strongest family app for US teen reach, and also reaches most of Europe

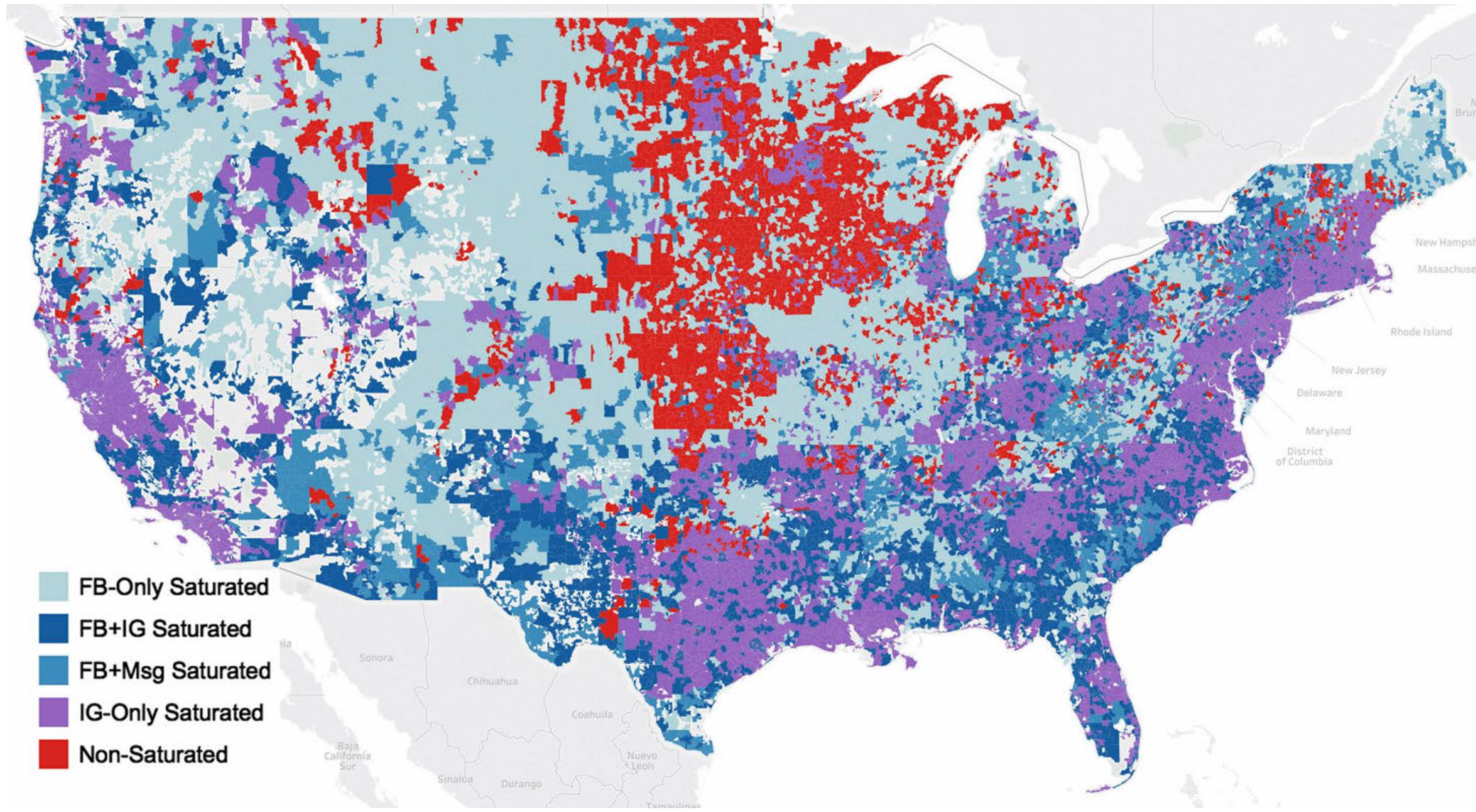


Snapchat has reached saturation among teens in the US, Canada, Australia, New Zealand, and parts of Western Europe



Country summaries hides complex patterns, including 25% of U.S. teens being dedicated users of Facebook, usually in areas distinct from Instagram’s strength

US Facebook, Instagram, and Messenger teen usage



Globally, under-13s are deeply under-served for social sharing

- Facebook formally serves 13+ users worldwide
- Global population skew young: There are XXB 5-12 year olds and YYM 13-18 year olds globally
- Tablet and smartphone usage are exploding in developed markets for kids as young as age 5
- Regulations like US COPPA have restricted growth of kid-kid or kid-parent social networks

Tablet ownership by age of child: 2010, 2011, 2012, 2013, 2014, and 2015

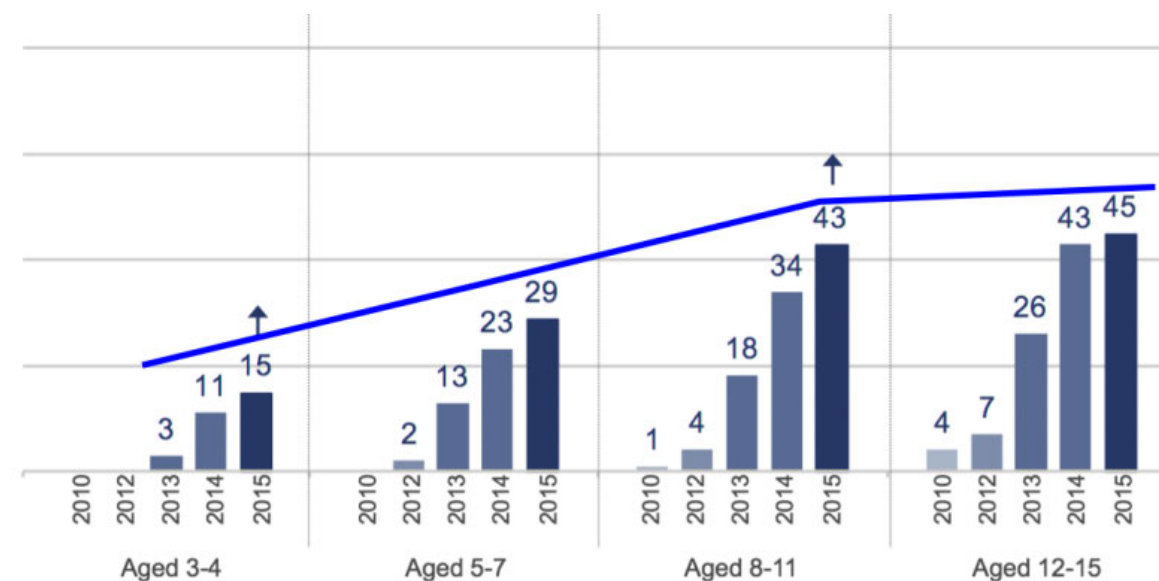
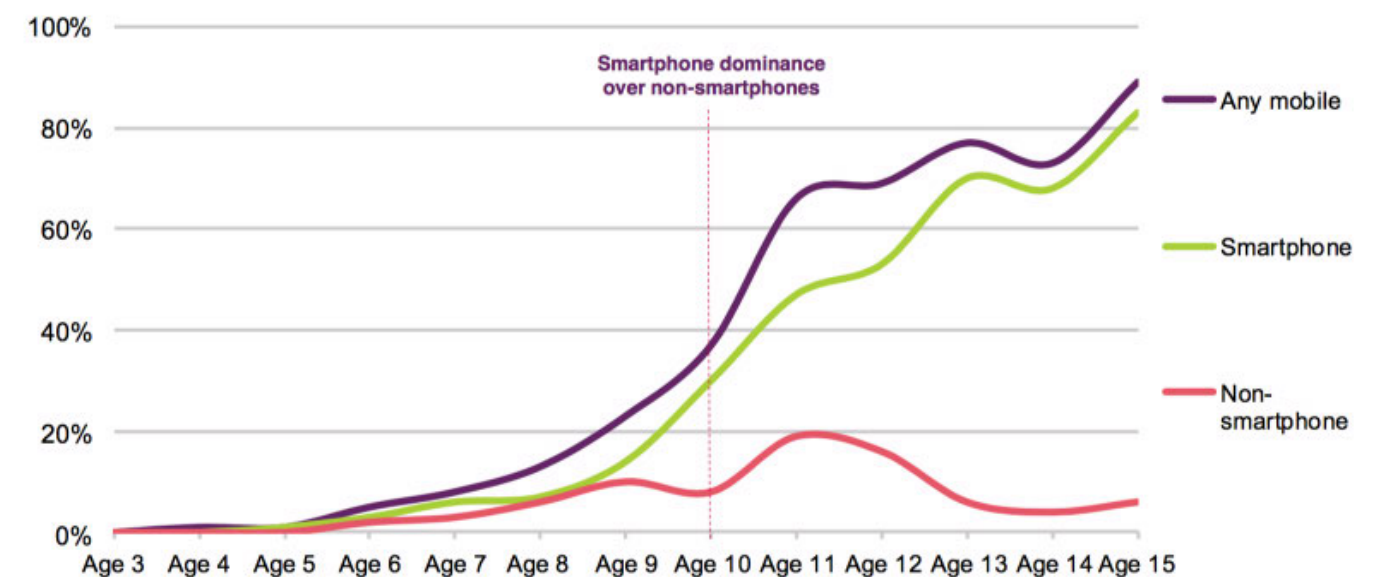


Figure 12: Smartphone ownership, by age of child: 2015



Our Approach to Teens

Our key hypotheses

- 1: **Building Lightweight Visual Sharing** with camera + stories + direct on FB and Instagram can re-establish core social use cases for smartphone-centric teens.
- 2: **Geographic strength of FBF apps** is not accidental, but reflects underlying market fit. Initially we should double down on the apps + locale combinations that are strongest.
- 3: **Adults are Toxic** Unless we allow teens to share separately from adults, the rest of world will inevitably follow the decline of teen engagement in the US and EU. We should invest in better audience, tools, graph segmentation for new teen users, and teen-centric growth, friending, and ranking.

Counter: RoW Adults are OK Fundamental differences between nuclear family structure and extended family structure make RoW teens okay with adult-inclusive sharing, and RoW will not inevitably follow US and EU. *We recognize but are explicitly not testing this possibility.*

- 4: **Teens share about real life and social entertainment**, and better enabling sharing about social entertainment topics like sports, stars, songs, and shows can help win back and grow teen social activity
- 5: **5-10 year olds are our best initial U13 segment**, allowing us to building on FB parent strength to grow a portable graph for young kids who will become future teens. 11-13yo “tweens” can fast follow in 2018, perhaps on IG.

Our big 2017 bets

Instagram Real Life
Social:
United States

“Win back US teen
”besties” social use
cases.”

Facebook Real Life
Social:
RoW

“Where FB is
working, segment
audience and graph
to allow teen social
sharing to coexist
with adults.”

Under 13s

“Deliver social value
to enormous
untapped market of
kids and parents.”

Facebook Social
Entertainment

“Give teens more to
discuss with their
real world friends by
better supporting
social entertainment
content on FB”

What Winning Teens Looks Like

Our Three Year Goal (EOY 2019)

- A Facebook family app is the #1 social app for every teen worldwide, with >60% social TS share

Our One Year Goal (EOY 2017)

- We have increased FB family teen time spent by X%
- We have launched new experiences to under-13 users to serve the next generation of teens

Our H1 2017 Top-Line Goals

- X% increase in teens time spent in the [United States] via Instagram
- X% increase in teens time spent in Row and Europe via Facebook

Appendix

Getting rid of that health warning: How we're fixing teen data

Rebuild the current age model to work across FBF apps at birth-year precision

- Many teens give incorrect ages
- Incorporate additional data from FBF and external sources

Create a reference + playbook for product teams

- Deltoid, Dashboards

Establish a "State of the Union" for both FBF apps and external market usage

- Internal analytics
- Onavo
- Platform App Data

Progress

- Work kicked off in September
- Target completion January
- Notable success – text parsing 'Happy nth Birthday' posts yielded 90M+ age confirmations

For U13 kids, we should build Facebook One identity, messenger, and platform

Problem Statement: Under 13s are a growing segment of smartphone and tablet users who are currently un-served by any social product.

Solution:

- Identity and platform login to power many partner games and apps
- A new Facebook app
- Visual & text messaging with parents and friends
- Feed of video and entertainment content
- Parents use FB Blue and/or Messenger to message, share video, and manage
- COPPA-compliant, launching in the US ~August

Rationale:

- Market need is growing
- Lack of clear winner
- Our strength with parents is valuable
- Initial focus on age bands 5-10 who are highly aligned with parents; tweens tbd
- Platform login can accelerate adoption by making existing kid apps social and better
- May give us advantage to retain kids as they become teens

Goal: Grow MAP, DAP, and time spent among U13 kids

Question: How product-y is the board discussion? This is the level of detail on our current WIP draft “what we’re doing” slides for H1-H2 decks. It’s pretty vague what we’re doing without these, but having four of them seems too much.