

AMENDED Exhibit 30

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

IG Growth Onboarding - [REDACTED]

[REDACTED], welcome to Instagram Growth. We're so excited to have you join the team and I'm personally looking forward to working together and learning from each other! I've prepared a short document to help you ramp up on the team and your role.

Product Context

At Instagram we "Imagine a place where young people and creators define themselves and the future." We believe that in order to achieve this vision we have to be the best platform in helping Young people and Creators with solving two core Jobs: Close Friends and Entertainment. The Growth team's purpose is to "Help everyone in the world grow closer to the people and things they love on Instagram."

Instagram has recently surpassed 2 billion monthly active users globally and continues to be the fastest growing app across the family with +370M monthly actives over the past year. While Instagram has the strongest market-fit with Teens across the Facebook family of apps, we are seeing fierce competition from TikTok. Our overall growth in the US has plateaued and we've recently seen concerning decline in US Teen growth, especially with early teens, indicating an existential threat for not just IG but the company overall. The Growth team's top goal this half is to reverse this decline and re-accelerate US growth.

Our biggest bet for competing with TikTok on the Entertainment job is Reels. At the same time, we're looking to lean into our strength with Close Friends through messaging. On Growth, we're in the process of revamping our strategy and defining short and long term bets. This is a critical moment for IG. We've never seen a more fierce competitor than TikTok. It's a bit scary but also very exciting. Our next set of actions will define Social Media for the next generation.

In addition to Growing Instagram, the team is also supporting the cross family Accounts & Identities and Family Experiences ("IDxE" and "FX") efforts, led by [REDACTED] team. It's a complex project, migrating much of our very optimized sign ups and accounts system to be centralized company experience. The longer term vision here is to enable people to use the same accounts and port over their identities from one app to the other (see this Q4 All-Hands minutes 55:56 in).

Team Context

Some context on the PM team. While we have a bunch of strong folks in place, we've also recently had a few departures. [REDACTED] the previous Growth Lead, moved to lead the IG Stories pillar after ~4 years on the team. [REDACTED] who was the previous Core Growth Lead, took an extended family leave and will likely come back into a new role, though we should chat about whether there's a fitting role for her on the team. And [REDACTED] has recently decided to go join a startup. We also have a couple of open IC roles on the team, one in Core Growth and one in Graph. Therefore, we have an opportunity to bring in some new folks and up level the team.

At the same time, you have some strong folks on the team. [REDACTED] who's one of the most tenured Growth PMs on the team, leads Core Growth and is a strong PM Lead you can lean on. [REDACTED] is an IC5 but has been on the team for a while and is a rockstar. Finally worth noting, [REDACTED] who's the most tenure PM on Graph, is interested to step into [REDACTED]'s role to lead Graph, although it might be a stretch since he just got promoted to IC6.

You have a great cross functional team in the Growth Leads (listed below). In addition to those, I recommend partnering closely with [REDACTED] who leads our IG Ecosystem team and was previously the DS lead for Growth for many years. He's incredibly knowledgeable about IG/Growth from a data and research perspective and can provide you with pointers to any data/understand question you might have.

Summary

There's some meaty areas here, and each of these areas will need significant work on strategy, execution and team building, and cross org collaboration. As such, I don't expect that you to immediately conquer all of them. Bellow is the ramp up plan I drafted for you, which we can discuss further in our 1:1s.

Finally, I wanted to signal boost this great write up from [REDACTED] which shares an approach he's taken for "career cold starts". I personally found really helpful in joining a new team in the past so wanted to share in case you find it useful.

I look forward to onboarding you to the team and working closely together!

Miki

Key things to do in the first 45 days

Meet key people listed below, ideally 1:1

Read all relevant background materials on Growth and the team listed below

Get into the right groups & quip folders listed below
 Get into all the right standing meetings listed below
 Go-through IG Formal on-boarding
 Go-through Facebook Management essential trainings
 Identify 1-2 impactful opportunities to accelerate the Growth team**

	Rough Timeline	Proposed Focus
1	0-15 days	Complete onboarding/training. Meet key people and stakeholders, learn/read. Identify 1-2 opportunities.
2	15-30 days	Start taking on Growth Lead driver responsibilities. Finalize 1-2 opportunity focus areas. Create your personal goals plan.
3	30-60 days	Take on full Growth Lead responsibilities. Try to land ~1-2 opportunities you identified for impact.

** my initial suggestions: (1) team building, hiring, morale (2) getting your hands dirty with the US Teen Growth decline turn around strategy.

Note: italics represent the really critical callouts

People to Meet

IG Growth

IG Growth PMs (Lets discuss context on each before you meet!)

[REDACTED] (Core Growth PM Lead)

[REDACTED]

[REDACTED] (Graph PM Lead)

[REDACTED]

[REDACTED] (former Core Growth Lead, on Leave)

IG Growth XFN Leads

[REDACTED] (ENG)

[REDACTED] (Design)

[REDACTED] (S)

[REDACTED] (UXR)

[REDACTED] (TPM)

[REDACTED] (CD)

[REDACTED] (G) also talk to [REDACTED] who's IG PG

[REDACTED] (DE)

Ecosystem Leads

[REDACTED] (DS)

Communities PG Leads

[REDACTED] (ENG)

[REDACTED] (Design)

[REDACTED] (UXR)

[REDACTED] (DS)

[REDACTED] (E)

Central Growth PMs

[REDACTED]

[REDACTED] (Core Growth)

[REDACTED] (FX)

IG PG/Pillar Leads

[REDACTED] (Interests + Co-Head of Product)
[REDACTED] (Creators & Discovery)
[REDACTED] (Shopping)
[REDACTED] (Ads)
[REDACTED] (SE + Co-Head of Product)
[REDACTED] (Stories)
[REDACTED] (Feed & Relevance)
[REDACTED] (Reels & Camera)
[REDACTED] (Private Sharing)
Miki Rothschild (Communities)
[REDACTED] (Product Foundation)
[REDACTED] (Well-being)
[REDACTED] (Youth)

Things to read

(Please quip comment here if you can't access these quips)

IG Growth Mission, Org and Roadmaps

Growth Mission: <https://fb.workplace.com/groups/617523721629580/posts/3209605960087996/>

Growth H1/H2 Roadmap: IG Growth - H2 2021 Strategy - IG Leads Review

US Teen Growth Decline Deep

Dive: https://docs.google.com/presentation/d/1eJcuuIR20lkewwTUGSh2_nu6E211TSLMKBVcMG_aIq/edit#slide=id.gab7feb9c

HPMs: <https://fb.workplace.com/groups/766856754265593>

Important Research/DS posts:

ask [REDACTED]

Dashboards/Data

Growth: https://www.internalfb.com/intern/unidash/dashboard/instagram_growth_overview_dashboard/main/

Ecosystem: <https://fburl.com/unidash/qzvy5xv8>

Teens: <https://fburl.com/unidash/zxxwrprt>

Wiki page

[REDACTED] Instagram Growth

Organizational Approaches

Instagram Product Principles

JTBD Playbook - IG Framework Towards Product Development

JTBD Internal Post

IG Organizational Context

Instagram Vision: <https://fb.workplace.com/notes/2764429473846983>

Instagram 2021H2 Priorities: https://fb.workplace.com/permalink.php?story_fbid=937449700365484&id=100023013870040

Instagram's Product Principles: [https://fb.workplace.com/notes/\[REDACTED\]instagram-product-principles/440758966704589/](https://fb.workplace.com/notes/[REDACTED]instagram-product-principles/440758966704589/)

Instagram Product Reviews Process: <https://fb.workplace.com/groups/teamig/permalink/3060678970638393/>

Instagram Community Vision: [https://fb.workplace.com/notes/\[REDACTED\]ig-community-vision/509255736520747/](https://fb.workplace.com/notes/[REDACTED]ig-community-vision/509255736520747/)

Instagram 2021H1/H2 m-Team

review: <https://fb.workplace.com/groups/instagramteam/posts/6082837738431457/>

Instagram 2021H1/H2 Roadmaps: 2021 - H2

Groups

(Please quip comment here if you aren't in any of these groups and can't add yourself)

Instagram

Instagram PMs: <https://fb.workplace.com/groups/igpms/>

Instagram Internal: <https://fb.workplace.com/groups/teamig/>

Instagram Product Reviews: <https://fb.workplace.com/groups/243894009320301/>

Instagram HPMs: <https://fb.workplace.com/groups/instagramhpms/>

Instagram FYI: <https://fb.workplace.com/groups/instagramteam>

Community/Well-being

Community PMs: <https://fb.workplace.com/groups/477163192813985/>

Community Team: <https://fb.workplace.com/groups/407327256402722/>

Growth

Growth PMs: <https://fb.workplace.com/groups/853623508147076>

Growth Leads: ask [REDACTED] to add you

Growth FYI: <https://fb.workplace.com/groups/202953518450678>

Growth Internal: <https://fb.workplace.com/groups/IGGrowthTeam>

Growth feedback: <https://fb.workplace.com/groups/617523721629580>

Growth team folder: IG Growth Leads (done)

team groups

ask [REDACTED] and [REDACTED] to add you to major team groups within Growth

Meetings

[Please ping [REDACTED] to help you get added to these]

Instagram

Instagram PMs (bi-weekly)

Instagram Q&As (weekly)

Growth

Growth PMs (bi-weekly)

Growth product reviews (weekly)

Processes

Ongoing

Explanation of Deep Dive Process and IG reviews

overall: <https://fb.workplace.com/groups/teamig/permalink/2247428288630136/>

Link to process in community

overview: <https://fb.workplace.com/groups/407327256402722/permalink/563845717417541/>

Review sign-up: Community

Overall HPM group: <https://fb.workplace.com/groups/2203309559725180/>

H2 expectations

Fill out your H1 personal

expectations: <https://fb.workplace.com/groups/460943131107804/permalink/673804566488325/>

Weekly 1:1 with Miki

Formal IG On-boarding

Email received setting IG orientation up
Desk

[Contact Support](#)

Conversation History

Quipbot#06 left the thread Sep 4 at 11:21 pm

Quipbot#06 Sep 4 at 11:16 pm

=====IMPORTANT=====

This Quip file has been copied to Google Workspace (<https://docs.google.com/document...>) as part of the Quip2Google migration efforts. Quip is moving to Read-Only. Please work in the new Google file moving forward.

Learn more

<https://fb.workplace.com/groups...>

Questions?

Visit the Quip2Google Migration Feedback Group (<https://fb.workplace.com/groups...>).

Note

New edits in this Quip file will NOT be automatically synced to Google Workspace.

Quipbot#06 added Quipbot#06 to the thread Sep 4 at 11:21 pm

Quipbot#06 added you to a document Sep 4 at 11:16 pm

  edited Sep 7, 2021 at 5:29 pm
Unchecked

Growth H1/H2 Roadmap:

  edited Sep 2, 2021 at 8:35 pm
Checked

Growth Leads: ask  to add you

Growth FYI: <https://fb.workplace.com/groups/202953518450678>

  ar edited Sep 2, 2021 at 12:00 am
Checked

Growth Mission: <https://fb.workplace.com/groups/617523721629580/posts/3209605969087996/>

Growth H1/H2 Roadmap:

US Teen Growth Decline Deep Dive:

https://docs.google.com/presentation/d/1eUcutR20tkewwgTuGSh2_nU6f211T5LMK8VcMQ_aHg/edit#slide=id.g6b7feb9c22_3_

Checked

Instagram PMs: <https://fb.workplace.com/groups/igpms/>

Instagram FYI: <https://fb.workplace.com/groups/instagramteam>

██████ edited Sep 1, 2021 at 7:54 pm

██████ opened your conversation with Miki Rothschild, ██████ and ██████ Aug 31, 2021 at 8:19 pm

██████ edited Aug 31, 2021 at 8:21 pm

██████ to add Instagram Growth

Growth PMs: <https://fb.workplace.com/groups/853623508147076>

Growth Leads: ask ██████ to add you

Growth FYI: <https://fb.workplace.com/groups/instagramteam>

Growth Internal: <https://fb.workplace.com/groups/IGGrowthTeam>

Growth feedback: <https://fb.workplace.com/groups/617523721629580>

Growth team folder: ask ██████ to add you to quip and g-doc folders (done)

██████ opened your conversation with Miki Rothschild, ██████ and ██████ Aug 30, 2021 at 9:58 pm

Miki Rothschild added ██████ to the thread Aug 30, 2021 at 9:28 pm

Miki Rothschild added you to a document Aug 30, 2021 at 9:23 pm

██████ opened your conversation with Miki Rothschild, ██████ and ██████ Aug 30, 2021 at 5:35 pm

Miki Rothschild edited Aug 29, 2021 at 11:30 pm

Some context on the PM team. While we have a bunch of strong folks in place, we've also recently had a couple of few departures. ██████, the previous Growth Lead, moved to lead the IG Stories pillar after ~4 years on the team. ██████ who was the previous Core Growth Lead, is on a took an extended family leave and will likely come back into a new role, though we should chat about whether there's a fitting role for her on... join a startup. We also have a couple of open IC roles on the team, one in Core Growth and one in Graph. This means you. Therefore, we have an opportunity to bring in some new folks and up level the team.

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██████ to add

Miki Rothschild added you to a document Aug 28, 2021 at 5:14 pm

Miki Rothschild added you to a document Aug 28, 2021 at 5:14 pm

Miki Rothschild added █████ █████ ██████████ to the thread Aug 28, 2021 at 5:20 pm

Miki Rothschild added you to a document Aug 28, 2021 at 5:13 pm

Miki Rothschild edited Aug 28, 2021 at 5:18 pm
Added

Instagram FYI: <https://fb.workplace.com/groups/instagramteam>

Growth PMs: <https://fb.workplace.com/groups/853623508147076>

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[Please ping ████████ to help you get added to these]

Miki Rothschild edited Aug 28, 2021 at 5:39 am

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Changed

Growth Mission: <https://fb.workplace.com/groups/617523721629580/posts/3209605969087996/>

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ask [REDACTED]

Added

Growth: https://www.internalfb.com/intern/unidash/dashboard/instagram_growth_overview_dashboard/main/

Ecosystem: <https://fburl.com/unidash/qzvy5xv8>

Teens: <https://fburl.com/unidash/zxxwrprt>

Deleted

Added

Instagram 2021H1/H2 Roadmaps:

Deleted

Instagram 2020 Priorities and DRIs: <https://fb.workplace.com/groups/igpms/permalink/3241716219210304/>

Other older ones:

IGPM offsite presentations for each pillar (July 2019):

<https://fb.workplace.com/groups/igpms/permalink/2622840787764520/>

Instagram's (new) mission (May 2018)

IG Large Org Update : Mission, Principles, Product Groups (June 2018)

IG Leadership Changes from [REDACTED] & [REDACTED] (Sept 2018)

Vishal's product process summary

Community organization summary

Vishal as Head of IG PM (Dec 2018)

WB focus on inclusion & respectful workplace all hands (Dec 2018) (1)(2)

End of 2018 All Hands with 2019 Goals All Hands (12/14/18) -- Deck -- Video

Changed

Instagram Vision: <https://fb.workplace.com/groups/teamig/permalink/2680844238621870/com/notes/2764429473846983>

Instagram 2020 2021H2 Priorities: https://fb.workplace.com/groups/teamig/permalink/2785586828147610/com/permalink.php?story_fbid=937449700365484&id=100023013870040

Instagram 2019H2/2020H1 2021H1/H2 m- Team review (including all pillar's roadmaps):

<https://fb.workplace.com/groups/teamig/permalink/2458123807560582/com/groups/instagramteam/posts/6082837738431457/>

Miki Rothschild edited Aug 27, 2021 at 5:11 pm

Product Context

Team Context

Miki Rothschild edited Aug 27, 2021 at 5:00 am

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