

## **AMENDED Exhibit 309**

# **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

# Laughing, Stalking and Fandoms - How to make IG an urgent app for US (Girl) Teens again

Owner: [REDACTED]

The below is based on learnings, ideas, discussions with and from [REDACTED] [REDACTED] [REDACTED], Kyle.

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## Primary thesis - We need to make instagram an "urgent app" again for US teens

- We are still a friends and family app and we are not going to be top of mind as an entertainment / video app.
- However, being a friends and family app is the greatest position of strength because having that position leads to "urgency to check" the app -- if you don't check IG today, you might miss something from your friends. You want to see what your friends are up to right now, however that same "urgency to check" doesn't exist for an entertainment app.
- Products with "urgency to check" i.e. multi-player apps, take precedence over single player entertainment apps when a person is bored (they are top of funnel in solving "boredom"). From our research we hear again and again that "I'm bored" leads to: check notifications / messaging products (e.g. Snapchat) → check Instagram feed. If there is even more "bored time" remaining, then people go to longer form entertainment products: Explore is in the check-out aisle or people go to YouTube or Netflix.
- The problem is that US teens have lost this "urgency to check" IG because their friend's most recent stuff is on SC. Instagram is no longer an urgent app.

## secondary thesis - Teen girls are more important, therefore build with them in mind

- The boys will go where the girls are.
- Girls are more likely to exhibit the behaviors that we are going to need to draw on in order to make the app urgent again -- specifically their propensity for --
  - Sharing: "Lololol. So funny."
  - Stalking: "What's [REDACTED] up to? OMG do you think he and [REDACTED] broke up???"
  - Convening: "Who would you ship me with? [REDACTED] [REDACTED] [REDACTED]?"
  - Multi-tasking: "I was watching YT, while DMing a boy and talking to my BFF on iMessage."

## a tangential thesis - Teens are not vapid and our wellness efforts are important for brand affinity

- "Wellness" - self care, mental health - is the "cause" that these kids care about. So we should continue to push here and better leverage the channels that reach them, specifically their stars, to make IG feel like a place that is safe, "gets it," and is an ally in addressing the problems that their generation wants to champion and address.

## so what's our strategy for bringing back the urgency? there are 5 themes:

- Get teens to re-share more with their friends 1:1 or in small groups (Laughing / Sharing)
- Ensure Home delivers what they want to see first (Stalking)
- Give profile more stalk-worthy mechanics (Stalking)
- Be where US teen girl fandoms can easily convene on the internet (Convening)
- Be present all the time (Multi-tasking)

## If these numbers go up, it means the strategy is working

- Primary: US Teen DAP
- Secondary: US Teen Sessions & TS

## before we go onto "the how" - Let's be clear on what this strategy is not

- This strategy does not outline how to keep them in the app once they are there. The Explore team's strategy and it's focus on owning a bigger piece of the "end of the boredom funnel," specifically through interest-video discovery and consumption is key here.
- This strategy does not go deep on how to get them to produce original content for their friends. This strategy only gets at how you can promote products like Stories and Live, which hopefully are sticky enough to get them to keep producing once they have tried them out.
- This strategy is not a "U13" strategy. Frankly, I don't think we can win with Tweens with this strategy. Tween products actually need to be more single-player products (entertainment, games) and this strategy above leans into our strength as a multi-player, identity app.

Onto "the How"...

Get teens to re-share more with their friends 1:1 or in small groups (Laughing /Sharing)

Why? If teens don't have as much relative original content to share on IG (vs. SC) then generate "urgency to check" by encouraging the teens we do have in the app today to re-share content with their friends. This would let teens do what we know they want to do -- it's a form of hanging and laughing with friends, building social currency for having made their friends laugh or see something cool, as well as having an excuse to message that cute boy or girl in class.

The hypothesis is that while this isn't original content, teens will still want to see what their friends have to say. Re-shares generate push notifications and bring people into the app. These are the best kind of notifications because they come from your friends. Furthermore, teens get pushed a lot (musical.ly, Tumblr, Twitter, SC - push all the time) so they are probably getting pushed less from IG vs. other apps.

How?

Explore Posts ranking changes

Social context on everything

Better video discovery

Encourage sharing via Direct (e.g., short cuts, contextual ranking, share sheet design)

Encourage sharing via SMS

Develop Live into "hangout" group video chat

Ensure Home delivers what they want to see first (Stalking)

Why? Tablestakes. Make sure that every time teens come to the app, Home delivers all the content and people that teens would deem to be "urgent." We need to make them feel like they were correct to open the app today, because had they hadn't, they would have missed something they wanted to see about someone they wanted to keep up with. [REDACTED] ran a p(profile tap) feed experiment, which was not shipped to production, however it is showing +1.2% US Teen DAP, building his case that Home is currently not optimized for showing US Teens the thing they want to see first.

[REDACTED]'s hypothesis is that US Teens value actions differently and therefore a "like," which is what we are currently predicting, is a way less meaningful action (they like all the things), and instead we should be predicting actions that better reflect what they value.

How? [REDACTED]'s reco is...

US Teen specific feed ranking model

US Teen specific stories ranking model

Favorites

Give profile more stalk-worthy mechanics (Stalking)

Why? IG profile is (currently and who knows for how much longer because SC is going to do this soon) the only permanent online presence of teens on the internet. Where do you convey who you are, what you are about other than IG? Teens take their profiles seriously. They visit and tweak their own profiles all the time. They visit each other's profiles and see what others have tweaked too. But, we aren't fully owning this strength. There is NO PLACE for teens to break-up on the internet! There's NO PLACE on the internet to tell the world who your BFF is! There is no place for "pull-based" drama and stalking! And, a lot of teens are private, so unless you follow the boy you have a crush on, you can't stalk him and lovingly stare at his photos before bed.

Thomas and I believe that if we give teens the mechanics for making their profile more communicative and tweak-able and therefore more stalk-able, then it will create more urgency in the app for teens to check out each others profiles and see what has been recently tweaked.

How?

Expressive bio ([REDACTED] has already hacked on / designed an idea for this i.e., annotating your bio with social connections and connecting emoji). In other words, feature your bff's profile pic with 🧑 and your bf's profile pic with 🧑.

Public highlights for private profiles

Favorites (will create curiosity and drama - "Did he add me to his favorites yet?")

Be where US teen girl fandoms can easily convene on the internet (Convening)

Why? The next best thing to your accessing your BFFs on the internet is accessing "your people" on the internet. Teens tell us they have interests and passions that they are growing and exploring that don't necessarily overlap with their friends'. They also have questions and curiosities that they want to answer and explore, which they don't necessarily feel comfortable exposing to their friends. In some ways, having access to a group of people you relate to can feel even more safe and supportive. There is no risk to reputation, to looking stupid. We see FB groups, tumblr, wattpad, younow, lively, poorly fulfilling this need to connect and to some degree IG does this too (but in a single player mode way). We have these groups of people who are trying to connect with one another on IG. After a lot of work, they end up becoming friends and talking to each other in Direct. But it's hard. Furthermore, for all of us, friends exist in the real world and then are kept up with on the internet. But for this gen, internet friends are just as valuable and we have heard people say "I met my best friend on IG - we have never met up in person but we talk every day."

The hypothesis is that if we help teens connect to their people on the internet, "their people" are larger than their friends and therefore can provide a constant source of relatively more urgent conversation and content for consumption (vs. just single-player entertainment content), widening the set of multi-player experiences at IG offers.

How?

Better comment experience for non-friends on public content

"Communities"

Creative tools for fandoms (e.g., Bretman Rock's make-up filter available for his followers)

InstaCamp (an in person convention for teens?)

Be present all the time (multi-tasking)

Why? Simply put, we need to "push" them more. They have several apps running at all times and those apps talk to them all the time. We are probably the least proactive app in terms of trying to garner their attention.

How?

Direct message system drop downs that are present in any app

Post notifications for the top post in feed / top Story in tray

"Entertainment" / interest notifications

And let's make sure to instrument really well

- Every product should have US Teen (total, girls, boys) for each of their major metrics in deltoid and in dashes
- Every product should report the impact of their experiments on US teen #s - topline for app, for their product and other products

## Experiment Results:

██████████'s P(profile tap) to Feed Value Model (+1.2% US TEEN DAP - STAT SIG)

<https://fburl.com/83xjp5gw>

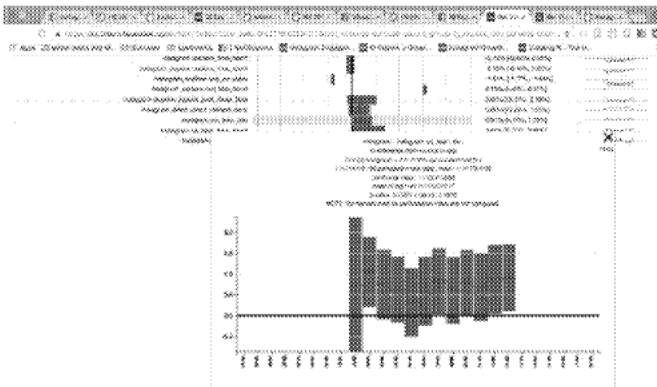
██████████ s P(all share) to Explore value model (+0.91% US TEEN DAP - STAT SIG)

██████████'s post: <https://www.facebook.com/groups/309726139453879/permalink/310737562686070/>

P(all share)

Deltoid: <https://fburl.com/ehwh35pr>

- IG engagement is neutral
- -0.5% explore\_dap, -0.69% explore\_l7, -0.1% explore\_ts, +0.9% explore\_clean\_likes, +3~10% explore\_post\_videoimps
- -1.61% avg\_oc\_score, +1.65% avg\_text\_score
- +1.40% us\_teen\_ts, +0.91% us\_teen\_clau
- +0.66% direct\_reshare\_send



[Contact Support](#)

## Conversation History

opened your conversation with [REDACTED]

[REDACTED]

[REDACTED], Kyle Andrews,

Sep 13, 2017 at 8:50 pm

opened your conversation with [REDACTED]

[REDACTED]

[REDACTED], Kyle Andrews,

Aug 16, 2017 at 11:20 pm

Kyle Andrews opened your conversation with [REDACTED]

[REDACTED]

[REDACTED], JUL 18,

2017 at 7:43 pm