

AMENDED Exhibit 310

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

RE: 3P's - [REDACTED]

From: Alex Schultz <[REDACTED]>
 To: [REDACTED] <[REDACTED]>
 Date: Fri, 18 Jan 2013 17:49:39 -0800

The ESPN roadmap is looking really good from the highlights I have seen!
 I think the focus on reach of push is super important. It's actually a bit crazy that stale push is the largest right?
 I wonder if there's anything we can do on Android that's better than push? I guess so many have email that this isn't too terrible but it would be good to move up DAU.

Alex

From: [REDACTED]
 Sent: Thursday, January 17, 2013 3:31 PM
 To: internetmarketing
 Subject: RE: 3P's - [REDACTED]

Point 1 is in regards to FB4iPhone users.

From: [REDACTED]
 Sent: Thursday, January 17, 2013 3:13 PM
 To: internetmarketing
 Subject: 3P's - [REDACTED]

Very productive week and ESPN roadmap planning is coming together.

Progress:

- Correction from last week where I stated 69 MM users are on app version <= 5.1 The underlying table I was looking at had data but is no longer being populated appropriately. The number is 16 MM.
 - o We'll probably run some promotions to get these users to upgrade.
- Increase % Pushable
 - o Push through VoIP – This one could be huge. 82 MM users on FB4iPhone aren't pushable but do have a token. Reaching them with local notifications through voip could have massive potential impact on DAU. 24 MM on Non-MAU's have a token so we could potentially reach them as well.
- Researching the best time of day to send push campaigns reveals that noon at 8-9pm are ideal times.

CA - USA			
Hour	ADD TO TRAY	CLICK FROM TRAY	Clicks/Adds
0	350,715	94,537	27%
1	213,468	50,154	23%
2	147,499	30,554	21%
3	139,569	26,409	19%
4	167,641	33,893	20%
5	224,801	58,327	26%
6	345,790	111,447	32%
7	541,631	175,983	32%
8	614,277	199,350	32%
9	666,572	216,717	33%
10	645,223	207,909	32%
11	862,836	264,847	31%
12	791,611	265,504	34%
13	802,757	261,669	33%
14	813,646	265,328	33%
15	864,918	282,560	33%
16	953,723	312,335	33%
17	1,030,973	342,432	33%
18	1,140,926	373,716	33%
19	1,209,981	398,481	33%
20	1,231,991	412,087	33%
21	1,136,686	382,863	34%
22	879,577	286,473	33%
23	572,085	170,965	30%
Grand Total	16,348,896	5,224,540	32%

- Increase reach of Push – A reasonably large number of users receive very few push notifications in a week. The ESPN team will be working on getting these users something.
 - o Reach
 - § Roughly 5 MM iPhone pushable, L28 <= 27, users receive 0 push notifications in 7 days. 18 MM receive 5 or less.
 - § Roughly 8 MM iPhone pushable, L28 <= 27, users receive 0 push notifications in 7 days. 28 MM receive 5 or less.
 - o Push Notification Type Distribution of these users. Yikes, many of these users are getting app_invites! Let's get them something that feels a little better. FYI, stale_email is our stale push notification.

Push Type	Receive 1 Notification		Push Type	Receive 5 Notifications	
	in Last 7 Days	Cumulative		in Last 7 Days	Cumulative
state_email	31%	31%	friend	16%	16%
friend	14%	45%	app_invite	14%	30%
msg	11%	56%	msg	13%	43%
app_invite	9%	64%	close_friend_activity	10%	53%
friend_confirmed	8%	72%	item_reply	7%	60%
close_friend_activity	6%	78%	friend_confirmed	7%	66%
item_comment	5%	83%	item_comment	7%	73%
item_reply	4%	87%	app_request	5%	78%
app_request	3%	90%	plan_user_invited	5%	83%
plan_user_invited	3%	92%	state_email	3%	86%
wall	1%	94%	photo_tag	3%	89%
photo_tag	1%	95%	wall	2%	91%
mention	1%	96%	group_activity	2%	93%
group_activity	1%	97%	mention	2%	94%
share_wall_create	1%	97%	notify_me	1%	95%

- [REDACTED] and [REDACTED] have been doing an awesome job in creating some push pipelines that are already paying off and will continue to.

Plans:

- Roadmap planning for ESPN.
- Test planning for Notifs Eng and increasing % pushable.

Problems:

JAT stopped a weekly push notification meeting we had and now I don't hear this song anymore.

<https://www.youtube.com/watch?v=k4onJ7Z2MLI>

- [REDACTED]