

AMENDED Exhibit 317

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

Message

From: [REDACTED] [/O=THEFACEBOOK/OU=EXTERNAL
(FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN=FC444336C38E49AAB4513E56A5D87E8A]
Sent: 9/23/2017 9:12:42 PM
To: David Ginsberg [REDACTED]
CC: [REDACTED]
Subject: Tween Research
Attachments: Tween_US.pdf

Hi David,

I just finished a review of our existing US research on tweens and combined it with just finished qualitative and quantitative vendor research on tweens and am attaching the deck for you. If you want to include it in this edition of your bi-weekly review, I am happy to upload to Research Home, but I want to wait with posting it more widely until Monday. In the deck, you will note that [REDACTED] – this is a requirement from Legal [REDACTED] PRIV PRIV

To answer the biggest fork in the road – Will it be sufficient to simply make FB or IG COPPA compliant for tweens? No, I don't think so. I think making these apps COPPA compliant is absolutely necessary, but simply opening them up without making product changes will not be a stopgap for our teen problem. The good news is though that no other social media app totally feels right yet either. Tweens are open to something new, and we can win with them. It looks to me right now that moving forward with product changes to our existing apps would be the best solution, but we need more research to understand whether we can move forward with existing brands or not.

The good news for us is that the real driver for tween engagement on social media is entertainment, not communication. Both FB and IG currently predominantly function as consumption platforms for tweens and we can start from that use case as a way in to create a tween social media experience that truly feels made for them. Apps that crash and burn with tweens have in common that they highlight communal experiences and entertainment (e.g. musical.ly), but they either don't highlight the social use case enough (e.g. YouTube) or they don't succeed in creating strong emotional bonds among people on the app. On the other hand, apps that highlight connections (e.g. Snapchat) are not sufficient for sustained engagement, because they don't allow tweens sufficient entertainment consumption (e.g. no ability to go down a rabbit hole of interests). I think there is something there for us to put our heads together around entertainment + communal experiences + connections. This is pretty exciting.

So you have everything in one place, I am listing upcoming research again here:

1) **Inflection points (approx age 9/10):**

As tweens move from tablets to phones, which apps/app categories do they only keep on their tablet, which apps do they keep and reinstall when they get their phones, and which apps/features they aspire to have when they have their own phones.

- a. **Objective:** Determine graduation strategy for Talk.
- b. **Methods:** Diary study; in-person in-context research; interviews; survey

2) **Current phone and social (media) usage (approx age 10-13):**

How are tweens currently using social apps on their phones? What is a high point/low point for them about social apps? What offline behaviors currently do not offer a good digital solution?

- a. **Objective:** Identify patterns of behavior, experiences, and needs.
- b. **Objective:** Identify white space for social app for this age group.
- c. **Methods:** Survey; usage data (=in-app actions via Onavo-facilitated panel); in-person interviews; diary study

3) **Understand opportunities for our existing product experiences (approx age 10-13):** Which changes to product experiences would need to be made to make FB appropriate for tweens?

- a. **Objective:** Guide product experiences for how COPPA compliant FB could serve tweens well

- b. **Objective:** Identify parents' needs for kids' FB experiences
- c. **Methods:** in-person participatory design activities; parent: child dyads; focus groups with parents; survey; (coordinating with market research re: brand)

I'm not sure if you want to come along on research trips, but here are some opportunities just in case:

- 1) Sep 30 + Oct 1 in Phoenix, AZ: Parent/child interviews about social media usage; parent focus groups around age bands and parental controls on FB
- 2) Oct 5 -9 in Germany and France: Parent/child interviews about social media usage; parent focus groups around age bands and parental controls on FB
- 3) Oct 21 – Oct 26 in Los Angeles, CA: Immersion, day-in-the-life of trendsetting tweens; participatory design activities
- 4) Nov 1 – 6 in St Louis, MO: Immersion, day-in-the-life of 'regular' tweens; participatory design activities
- 5) Nov 20 – 21 at MPK: Organizing a workshop to frame tween product concept with Dubit

Apologies for the long email, but wanted to share with you before sharing out more widely. Let me know if anything needs to be changed.

