

AMENDED Exhibit 323

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 SLIPSHEET

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Filename: RESEARCH PLAN - SETTINGS AND PRIVACY - LA (SMART DEFAULTS)

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TNAG BEGBATES:

TNAG ENDBATES:

MAAG BEGBATES:

MAAG ENDBATES:



Research Plan - Settings and Privacy - LA (Smart Defaults)

US Smart Defaults Plan approved: T46017675

International plan Pending approval: A/C Priv - T47822280

Goals

- To develop an understand of how users use existing tools and settings and how they can be improved (for users who have been bullied).
 - Understand how targets use (or don't use) privacy settings, and identify opportunities for improvement
 - Understand expectations of privacy and reachability

Specific Aims

Understand work

- To explore users' understand of existing tools
- To explore when and why users implement these tools
- To explore gaps in existing tools
 - Private
 - DM reachability
 - Tags
 - Mentions

Testing products

- **Privacy/Smart Defaults: To understand different privacy and security concerns and needs across:**
 - Different populations (e.g., teens versus adults, communities/groups)
 - Situations/scenarios/Use cases (e.g., when i'm looking for a job, when i'm being bullied)
 - To understand what default packages would be useful for users who are starting an account
 - (Definitions: Security- account access and use, Privacy- account content and interaction)
- **Away mode**
 - To understand different situations when users would want to take a break from IG and social media
 - To understand what factors are most disruptive (e.g., notifications and which ones)
 - To test away mode concepts
- **Settings/Existing tools**
 - [fill]

Methods

- 1-1 In-depth interview

Location

- US - LA (High D&D rate and also the second highest MAP)
 - <https://our.internmc.facebook.com/intern/daiquery/report/322080878728538/680239925778399/407046776828026/> - the absolute number of deletions and deactivations, and also % of D&D against DAP - LA has a high D&D rate and also the second highest MAP

city	ig_map_30	avg_daily_deletions	avg_daily_deactivations	daily_deletion_percentage	daily_deactivation_percentage
New York	8197124	884	1829	0.0112647	0.022994
Los Angeles	3780799	734	1079	0.0195171	0.0286907
Chicago	2096940	293	383	0.0140437	0.018316
Houston	1819186	321	433	0.0176564	0.024297

- o <https://fburl.com/daiquery/SeuHid9> (count for taking a break and privacy concerns is higher in NY, but percentage of daily D&D for these reasons are higher in LA)

city	ig_map_30	deactivation_reason	avg_daily_deletions	avg_daily_deactivations	daily_deletion_percentage	daily_de
New York	6197104	privacy concerns	85	84	0.0015716	0.001618
Los Angeles	3760799	privacy concerns	70	64	0.0016613	0.001701
Chicago	2096343	privacy concerns	25	20	0.001933	0.000958
Houston	1918185	privacy concerns	29	25	0.0015104	0.001304

city	ig_map_30	deactivation_reason	avg_daily_deletions	avg_daily_deactivations	daily_deletion_percentage	daily_c
New York	6187104	need break	0	826	0	0.0148
Los Angeles	3760799	need break	0	681	0	0.0154
Chicago	2096343	need break	0	167	0	0.0079
Houston	1918185	need break	0	228	0	0.0117

Vendor

- Answerlab

Schedule

- Sept 16

Sample

A	
1	Group
2	New account (n=10, 7 teens)
3	New user (completely new users): Joined IG in last 30 days - lists
4	Existing user (New secondary accounts): Started a new account in the past 30 days
5	Not active (n=10, 7 teens)
6	Churn - taking a break (hasn't used for last 45 days) -
7	Alternative: Took a break from IG in the past
8	If possible - never used

Other

Smart Defaults Survey copy: Planned survey on Privacy on IG

Current Private Behavior

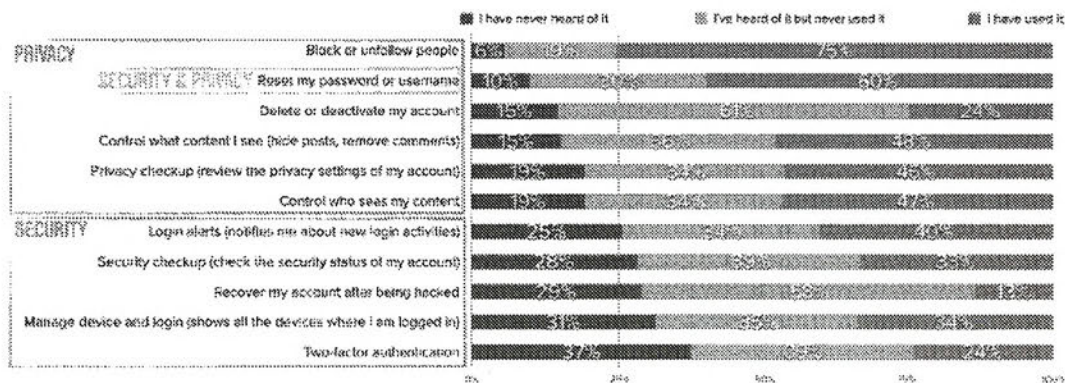
Even though "Private" prevents unconnected users from seeing their content, these accounts can still heavily interact via DMs, Tags, and Mentions.

Currently there's no way to stop such behavior.

		PRIVACY	
		Private	Public
RELATIONSHIP	Connected	Mention Tag DM See Content	Mention Tag DM See Content
	Unconnected	Mention Tag DM See Content	Mention Tag DM See Content



Two-factor authentication has the lowest level of awareness among the features surveyed. Privacy features have higher awareness than security features, except "reset my password or username".



Source: Pew Research Center, "Social Media Privacy and Security Settings: What Do You Know?"

Recruit

For most up to date recruitment, refer to:

<https://docs.google.com/spreadsheets/d/1HnG-jVu88S0wFIIcgnYN4C99JFLvp-4V-GHzKVndok/edit?usp=sharing>

Materials

- Mocks - to present on screen
 - Settings menu [pending]
- Privacy and security lists
 - Settings
 - Made your account private
 - Privacy Tools
 - Hid your activity status
 - Controlled if tagged photos of your showed up on your profile
 - Story controls (hid your stories, limited who can see your stories)

- Comment controls (block comments, hide comments, filter comments)
 - Created a Close Friends list or Added people to my Close Friends list
 - Other actions
 - Blocked accounts
 - Removed followers
 - Reported accounts or posts
 - Muting
 - Created a separate account (with smaller network)
 - Whiteboard - to brainstorm
-

Screener questions

[Administered via email survey by vendor]

Inclusion Criteria

- Must be 13+ years old
- Teens who have been bullied
- Equal representation from
 - Gender
 - Private and public profiles
- [We will try to recruit the below populations, but if not possible, will focus on bullied teens]
 - New users - First account, Multiple accounts
 - Churned user, Took a break (for privacy reason)

Instagram Research Participation Survey

Thank you for your interest in Instagram research! We are constantly trying to improve your Instagram experience and would love your feedback.

This will be a 60-minute session taking place in-person on [dates] at our Instagram office in [fill]. If you are selected and participate in-person, you will receive a **\$100 [fill compensation type]** (redeemable for a selection of gift cards from popular retailers).

We value user privacy and your answers to this survey will be strictly confidential and ONLY be used for recruiting purposes.

What is your age? → **prioritize teens**

13 to 17

18 to 24

25 to 34

35 to 45

45 or older

What is the gender you identify with?

Female

Male

Non-binary/third gender

Other

Prefer not say

Prefer to self-describe: ____

Which of the following apps do you currently use on your mobile phone? (select all that apply)?

Facebook

Instagram → if **not** selected, continue to Q4, if selected → Q8

Snapchat

Twitter

WhatsApp

Messenger

None of these → **if selected, continue to Q4**

In the past, have you ever had an Instagram account?

Yes → **Q7**

No, I've never had an Instagram account → **Not active-users group - never had an account → Q5**

Why have you never had an Instagram account? → **prioritize those with safety and privacy concerns → Q6**

I didn't know how it worked

I was too busy/I didn't have time to use Instagram

I thought it'd be too distracting

I was concerned about my data

I was worried about who would find me

I was worried about who could see my information

I was worried about who could see what I posted

I was worried about what others would do with the things I posted

I was worried others would steal my pictures or identity

I was never interested in having an account

Something else: _____

Even though you have never had your own account, have you ever used Instagram. Meaning, have you used someone else's Instagram account?

Yes → **Skip to contact info**

No, I've never used Instagram → **Skip to contact info**

How many total Instagram accounts have you had in the past? → **Q9**

1

2

3

4

5+

How many total Instagram accounts do you have?

1

2

3

4

5+

Have you **completely stopped** using Instagram for the past 45 days?

Yes → **Churned user → Q10**

No → **Q11**

Why did you **completely stop** using Instagram in the past 30 days? → **prioritize those with safety and privacy concerns → Skip to contact info**

Can't find people to follow

Want to remove something

Too many ads

Too busy/too distracting

Concerned about my data

Created a second account

Trouble getting started

Privacy concerns

I was using Instagram too much and just needed a break

I had a negative interaction with someone else on Instagram

I was feeling overwhelmed

I needed a break

Something else: _____

Have you **taken a break** from using Instagram in the past?

Yes → **Took a break from IG group → Q12 to determine when**

No → **Q14**

When did you take a break? → **prioritize users who took a break more recently**

Insert times

Why did you take a break? → **prioritize users who took a break more recently** → Continue to determine if also new account

Can't find people to follow

Want to remove something

Too many ads

Too busy/too distracting

Concerned about my data

Created a second account

Trouble getting started

Privacy concerns

I was using Instagram too much and just needed a break

I had a negative interaction with someone else on Instagram

I was feeling overwhelmed

I needed a break

Something else: ____

Have you opened an Instagram account in the past 30 days

Yes → Continue to assess if first account or multiple accounts

No → **Not Eligible (unless met criteria for taking a break)**

Was this account your first account?

Yes → **First account group** → skip to Q17

No → **Multiple accounts group (but newly opened account in the past 30 days)**

Why did you open up another account? → **prioritize those who opened another account due to safety and privacy concerns**

The new account served a different purpose

I wanted to limit my network

I had privacy concerns with my previous account

Something else: ____

When opening up your account, did you have any concerns? → **prioritize those with safety and privacy concerns**

I didn't know how it worked

I thought it'd be too distracting

I was concerned about my data

I was worried about who would find me

I was worried about who could see my information

I was worried about who could see what I posted

I was worried about what others would do with the things I posted

I was worried others would steal my pictures or identity

Something else: ____

How frequently in the last month have you used IG?

Daily (Every day)

5-6x per week

3-4x per week

1-2x per week

Less than once per week → skip to end

Never → skip to end

Do you have (a) public or private Instagram account?

I have a private account(s)

I have a public account(s)

I have private and public accounts

Have you used any of the below to make your account/content more private or secure?

Made your account private

Blocked accounts

Removed followers
 Reported accounts or posts
 Hid your activity status
 Controlled if tagged photos of your showed up on your profile
 Story controls (hid your stories, limited who can see your stories)
 Comment controls (block comments, hide comments, filter comments)
 Muting
 Created a separate account
 Created a Close Friends list or Added people to my Close Friends list
 I have never used any tools or controls on Instagram to make my account/content more private or secure
 Other (please specify): _____

In the past 30 days, have **other users** done any of the following to you on Instagram? (select all that apply) → **Prioritize those who have been bullied**

Threatened to physically harm you (or your possessions)
 Insulted or disrespected you
 Excluded you or left you out
 Contacted you against your wishes
 Damaged (or threatened to damage) your reputation
 Put down your religion, ethnicity, gender, class, or other group you belong to
 Disrespected your friend or family member
 I haven't experienced anything like this in the past 30 days → **Not a target, end**

Who has done this to you on Instagram? Please select all option(s) that describe who has targeted you in the past 7 days. → **Prioritize actors that the target knows**

Strangers or someone I don't know
 Someone I've interacted with briefly in person
 Someone who I interact with only online
 Acquaintances
 Classmates, coworkers, or neighbors
 Family members
 Friends
 Romantic partners
 Former romantic partners or friends
 Other (please specify below): _____

Where did you experience this on Instagram? Please select all that apply to these experiences. → **Prioritize users who were targeted in DM and in a comment on their post(s)**

A comment on one of my posts
 A comment on someone else's post
 A direct message
 A reply to my Story
 Someone else's story
 My Feed (the first tab on the left)
 A hashtag page (a page that shows posts with a specific hashtag)

[Contact info]

Thank you!

Discussion questions

Part 1. Intro

Hi [participant name], thank you for taking the time to speak with me.

Who we are

Hi, my name is _____ and I'm a researcher working with Instagram. Thank you for taking out time to speak with us today.

Why we're doing this (purpose/goals of the study)

The goal of this research is to learn more about your positive and negative experiences on Instagram.

This interview will last around 1 hour.

Emphasize confidentiality

This conversation is confidential. While we may write up high level findings, nothing you say will be attributed directly to you. Findings will only be shared internally.

What you say will remain confidential.

All data will be de-identified, and nothing they say will be communicated externally.

I also wanted to remind you of the Research Participant Agreement (RPA) that you signed which basically ensures that you will not share or talk about what is discussed today (e.g., what IG is exploring and possibly planning to do).

Setup of room / equipment

As I mentioned to you earlier, with your permission, I will be recording this session (voice and video).

I also have a member of our team dialed in so they can take notes from our session.

Introduce overview of time together & set expectations

As I mentioned earlier, we are looking to learn about your experiences on Instagram, and specifically what you do when you encounter something that you believe should not be on Instagram.

I'm here to learn from, so there is no wrong answer or response.

We'd like to hear all of your opinion, so please feel free to speak openly. I also want you to feel comfortable sharing **both negative and positive experiences/opinions about our products**.

Any and all insight and help that you can give us to improve our product is valuable.

There may be moments when I am silent. I just want to make sure that you have enough time and space to express yourself and share your experience in its entirety.

Before we begin, do you have any questions for me?

"Great, so let's jump into the interview."

Part 2. Participant background**Tell me about yourself ...**

How old are you?

Hobbies and interests?

What is your favorite subject in school?

Who do you hang out with?

What's your relationship with your friends like?

Do you ever have disagreements?

How do you handle them?

Internet / social media use

Can you tell me generally about your use of social media?

What sites do you use?

What do you use them for?

Walk me through a typical session when you use Instagram

Probe: What do you do on Instagram? [let them guide, add suggestions as needed]

Probe: Storing or sharing photos or videos, Keeping in touch with friends and family, Connecting with new people, Finding people who have similar experiences, Keeping up with my interests, Getting information about businesses, Following celebrities or other public figures, Learning new knowledge or skills, Being entertained or passing time.

What kinds of accounts do you follow?

What other sites do you use? [Probe into use of other social media]

What are different reasons for using each type?

Are certain sites better for some things and worse for others? (e.g., sharing, connecting with friends etc.)

Instagram accounts

How many accounts do you have?

What do you use these accounts for? What is the purpose of these accounts?

When starting these accounts did you know what you'd use these accounts for?

Or did the purpose change over time?

What are things that helped you better define what you wanted to use your IG account for?

[e.g., Viewing how others use? seeing how others respond to your content?]

Did the purpose change over time?

You said that you started this account to [x] have you been successful in this?

Why or why not?

If not,

What did you do? Did you do anything to try to improve this?

How did this impact how you used Instagram?

Part 3. Bullying experience

Now that we have a good idea of how you use social media, I'd like to learn more about the good and bad experiences that you've had on social media.

Let's start with a **positive experience**

What happened

What about it made you feel good

What role did IG (or other social media) play

Now I'd like to learn more about **negative experiences** on social media [probe into unwanted interactions].

Can you tell me more about what happened? [Have you ever been targeted by bullying?]

What did you experience (on and offline)?

What was happening in the time before? What led up to this?

What triggered or caused this?

What is your relationship to the person that bullied you?

Were there others involved?

What was their role?

How did this make you feel?

How long was this happening?

What did you do? (on and offline)

How did you react?

Did you reach out to the person?

What happened?

How did they respond?

What did you do (on and offline)?

Did you report this to Instagram?

Why/Why not?

Can you walk me through your experience in doing this?

Did you feel supported?

[Online strategies- Blocking, muting, unfollowing]

What was your goal in doing this? (e.g., block at the user level? block at the surface - story, comment, DM - level? other?)

Were these useful?

Were they appropriate?

Were there any limitations to these tools?

Can you tell me how you did this?

What tools did you use?

Were these controls easy to use?

Were these controls easy to find?

What would make this easier to find?

What were some challenges?

What would improve this experience?

What other controls would you like to see?

[Offline strategies]

What other strategies did you use?

Did you take a step away from social media?

Why?

What did you do in the meantime?

Did this fix the problem?

Why or why not?

When returning to use IG, was the problem resolved?

Did taking a break solve the problem?

Why or why not?

When returning to IG did you use IG differently?

How so?

How did you feel after you did this?

Were the above actions that you took successful? (Did this fix the issue?)

Why or why not? How so?

What happened next?

How long did this take to resolve (if at all)?

Has this happened again?

By the same person? Someone else?

How frequently?

How have you responded?

Has your response changed over time? How so?

If this happened again, would you handle this differently? How so?

What do you think IG can do to support you in this experience? See below responses and probes.

Remove the content

Ban the account

Punish/Take action against the actor

What punishment makes sense?

Educate the actor

What education would you like them to receive?

[For friends]

What happened from your perspective?

What was your role in this?

How did you help [participant's name]?

Part 4. Privacy

[The goal of this is to 1) Understand how targets use (or don't use) privacy settings, and identify opportunities for improvement, 2) Understand expectations of privacy and reachability.]

Earlier we talked about actions that you took when [describe experience being targeted]. You mentioned that you used [list what they used], I'd like to get a better understanding of your expectations of privacy and how we can improve Instagram to meet your needs.

How would you define privacy [fill out below table then add next column title - security]

[for each row dig into the "from who" and "what"]

What is most important?

What do you value?

[Dig into how people think about privacy. Do users think about privacy in terms of discovery (who can find my account), visibility (who can see my info), and interactions (who can interact with me)?]

How would you define security

Repeat above Qs.

How would you define safety

	A	B	C	
1			Privacy (Y/N)	[fill c Safe]
2	Who can interact with you	[Privacy] Limiting who can interact with you/reach you		

3	Who can find/reach you	[Privacy] Limiting who knows about your account		
4	Who can see your content	[Security and privacy] Limiting who can see your content		
5	Who can use/take your content	[Security and privacy] Protecting your content		
6	Who can interact with your content	[Security and privacy] Protecting your content/Limiting how people can interact with your content		
7	Who can see your information	[Security and privacy] Protecting your information/Limiting who can see your information		
8	Your location			
9	Protecting your identity	[Security and privacy] Protecting your identity		
10	Protecting your account	[Security] Protecting your account		
11	Who can see your activity			
12	Other?			

How are privacy, security, and safety different?

How would you control- tools are they using, and what words or labels are they looking for.

Your privacy on IG?

Your security?

Your safety?

Part 5. Public/Private profile

What does it mean when you have a **public profile** [fill out below table]

[refer to responses above on having public/private profiles] Why did you choose to make your [x] profile public?

What did you hope to achieve with a public profile?

[Visibility] Of what by who?

[Discoverability] By who?

[Interactions] Type by who?

[Connection/attachment to posts] From who/to what?

What does having a public profile help you to do? [It helps me to discover new accounts, it help me to figure out which friends use IG]

	A	B	C	D
1	[x]	Who can/Can they...	How do you feel about others' ability to [x]	For participant who are not satisfied with [x], What should [x] do?
2	DM you			
3	Add you to group DMs			
4	Tag you			
5	Mention you			
6	Search or find you			
7	See your information			
8	See your posts			
9	See your stories			
10	Interact with your content (and how so)			

What does it mean when you have a **private profile** [fill out above table]

Dig into how people think about privacy. Do users think about privacy in terms of discovery (who can find my account), visibility (who can see my info), and interactions (who can interact with me)?

[refer to responses above on having public/private profiles] Why did you choose to make your [x] profile private?

What did you hope to achieve with a private profile?

[Visibility] Of what by who?

[Discoverability] By who?

[Interactions] Type by who?

[Connection/attachment to posts] From who/to what?

How can private mode be improved? What is private missing?

[probe into expectations/limitations/wants based on bullying experience]

Do you want Private to be different when you are having these experiences? How so?

[probe into what are pain points- e.g., make it harder to connect]

Will it be harder for people to find you? For you to find people? For you to grow your network or find things that you want to follow?

Are there time that you choose to change your profile from public to private or private to public?

Why?

What initiates this?

[probe into experiences of aggression]

Has this been a successful strategy?

What or why not?

What initiated you to change it back?

Now thinking about these different controls [x], I'd like to walk through your experiences using IG, and see which ones should be turned on or off automatically? [Fill out row 1 with relevant time points and experiences]

[Fill in the below table with the below levels of access]

Inclusion

All off

All on

Only followers

Only following

Only mutual follows

Exclusion

No strangers

Unconnected accounts

[fill]

	A	B	C	D	E
1		Starting account	Type of account (e.g., public account, private account, meme account, interest account)	What I'm posting	x experience
2	Reach you via DM				
3	Add you to group DMs				
4	Tag you				
5	Mention you				
6	Find you				
7	See your information				
8	See your posts				
9	See your stories				
10	Interact with your content (and how so)				

Part 5b.

[Review mocks]

Dig into language, use cases, impression etc. for mocks here (https://www.dropbox.com/s/5zimtm7zhw61lx/Privacy%20research_mocks.key?dl=0)

Key questions are embedded in the presenter notes.

Part 6. Privacy tools

Now i'd like to discuss what you think about other privacy tools that we offer. Above, you mentioned that you used [fill in tools mentioned above] when you were going through [describe experience of aggression], so let's start there.

[Refer to below table: Start with tools they have used and then go through rest of list].

	A	B	C	D	E	F
1	[x]	Have you ever used [x] [if not indicated above]	What happens when you [x]*	Why did you use [x]?	What were your goals in doing this?	Was x effective/su ul?
2	Blocked accounts					
3	Unfollowed					
4	Muting					
5	Removed followers					
6	Hid your activity status					
7	Controlled if tagged photos of your showed up on your profile					
8	Story controls (hid your stories, limited who can see your stories)					
9	Comment controls (block comments, hide comments, filter comments)					
10	Created a Close Friends list or Added people to my Close Friends list					

*[For "What happens when you [x]"

Reach you via DM

Add you to a group chat

Tag you

Mention you

Find you

See your information

See your posts

See your stories

Interact with your content (and how so)

Part 7. Other actions

Now i'd like to discuss other actions that you have taken to protect your privacy or be more safe on IG. Above, you mentioned that you used [fill in any action mentioned above] when you were going through [describe experience of aggression], so let's start there.

[Refer to below table: Start with tools they have used and then go through rest of list].

	A	B	C	D	E	F
1	[x]	Have you ever used [x] [if not indicated above]	What happens when you [x]*	Why did you use [x]?	What were your goals in doing this?	Was x effective/su ul?
2	Reported accounts or posts					
3	Created a separate account (with smaller network)					

- [For "What happens when you [x]" - see above probes

Part 8. Check in & Wrap up

How are you doing/feeling?

Is there anything else that you would like to share?

Do you have any additional questions/comments about this research study?

Participant might ask about compensation: *Thank you gift \$100 Instagram e-Reward, redeemable for a selection of popular e-gift cards through PerksWW*

Would you be interested in participating in future research on this topic.

Thanks for participating in our research. Your feedback and time is very important to us. Your ideas and insights are

extremely valuable and will help us as we continue thinking about how we can make a positive impact in this space. Thank you again for your time.

You will be able to redeem your e-Reward in the Reward Zone for a selection of amazing gift cards.
Eight of our most popular brands* include:



END

[Contact Support](#)

Conversation History

Quipbot#04 removed QuipBot and Quipbot#04 from the thread *Aug 24 at 11:01 pm*

Quipbot#04 added Quipbot#04 to the thread *Aug 24 at 11:01 pm*

Quipbot#04 added you to a document *Aug 24 at 10:56 pm*

QuipBot *Jul 30 at 2:05 am*

=====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

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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 added QuipBot to the thread *Jul 30 at 2:10 am*
