

## **AMENDED Exhibit 349**

# **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

12/17/2024

>It is about looking good to regulators so that they don't block our under 13 year old IG version we are working on. Thats it. It has a terrible impact on teen engagement and retention and no detectable benefit on integrity metrics

[REDACTED] (7/29/2021 15:29:01 PDT):

>On the other hand the numbers I pulled for PBD stat review made the front page of the BBC yesterday :)

[REDACTED] (7/29/2021 15:29:17 PDT):

>So I can probably take the rest of the year off :)

[REDACTED] (7/29/2021 15:31:08 PDT):

>The fundamental issue is that new teens dont understand the difference between public and private and will just go with the default without even thinking. So the ones that lose all the engagement just think 'IG sucks' and churn without even realizing it could have been different. While the ones that we are saving from harassment - well a week later they would have just switched to private anyway so we didn't really achieve anything

[REDACTED] (7/29/2021 15:31:33 PDT):

>Ok just confirming. So do teens actually want this at all? Are they more likely to use IG if their parents are more comfortable? I feel like the helicopter parents are small compared to the opportunity we throw away if teens get more exposure on another platform. Aligned with your thinking and/or UXR? Kenzie Junia Kevin

[REDACTED] (7/29/2021 15:32:18 PDT):

>afaik there's a whole UXR team working on this

[REDACTED] (7/29/2021 15:35:01 PDT):

>I feel like we heavily underestimate the intelligence of young people. I remember being frustrated about that at 13. I'm sure it varies by education, country, etc, but the teens admiring Billy Eilish, and lip syncing about their daily life don't seem that confused about public vs private... maybe it's as simple as a NUX where people do a practice post and see that people they don't know can see and comment.

[REDACTED] (7/29/2021 15:35:35 PDT):

>Teens already using IG aren't confused. But brand new users are

[REDACTED] (7/29/2021 15:36:47 PDT):

>Or to be more precise - they are not confused - they never even think about it before they churn

[REDACTED] (7/29/2021 15:38:20 PDT):

>I, probably erroneously, thought PBD was more about getting in front of regulators and buying us some good will?

[REDACTED] (7/29/2021 15:40:29 PDT):

>Yep thats what it is

[REDACTED] (7/29/2021 15:43:28 PDT):

>Got it. Let's just make a toggle button that starts with "Private by default" in ugly sad colors and the flip will be a bright green "You're a \* " with slot machine music and cute [boys-girls] looking really impressed.

[REDACTED] (7/29/2021 15:43:55 PDT):

>#PBD