

AMENDED Exhibit 361

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: Mark Zuckerberg [/O=THEFACEBOOK/OU=EXTERNAL (FYDIBOHF25SPDLT)/CN=RECIPIENTS/CN=[REDACTED]]
Sent: 4/4/2017 10:19:42 PM
To: Kevin Systrom [REDACTED]; Kang-Xing Jin [REDACTED]
Subject: Re: Instagram HPM
Attachments: image001.png; image002.png; image003.png; image004.png; image005.png; image006.png

Great

From: Kevin Systrom
Sent: Tuesday, April 4, 2017 2:45:19 PM
To: Mark Zuckerberg; Kang-Xing Jin
Subject: Re: Instagram HPM

We're building skin smoothing and face transforms in-house at IG but everything is being contributed back to the core camera SDK and will be available for all teams to use!

From: Mark Zuckerberg [REDACTED]
Date: Tuesday, April 4, 2017 at 12:29 PM
To: Kevin Systrom <[REDACTED]>, Kang-Xing Jin [REDACTED]
Subject: Re: Instagram HPM

This is all very impressive. The focus on beautification is a key insight. Are we building these features in a way that they can be used in all our cameras, or are they just specific to IG?

From: Kevin Systrom
Sent: Tuesday, April 4, 2017 11:26:18 AM
To: Instagram HPM
Subject: Instagram HPM

HIGHLIGHTS

Creation & Communication

	Current	Goal	
Feed Media	0.307	0.31	media/dap
Stories			
Daily Posting Participation	7.50%	11.70%	
Daily Production	2.68	2.75	media/poster
Ephemeral Photos			
Daily Sending Participation	0.52%	5%	
Daily Production	3.79	5.5	media/sender
Live Broadcasts per Day (M)	6.99	8	

Continuing work on masks and a standalone camera app

- **MQRD integration:** We're conducting a "dark launch" of our MSQRD integration to make sure that we maintain performance when we launch face filters publicly. This week, we improved several negative metrics to neutral metrics on Android. We expect to see iOS test results later next week.
- **Filter designs:** We're translating design concepts for "cute" filters into the MSQRD editor.
- **Skin smoothing:** We've nearly completed our skin smoothing technology. We're now combining skin smoothing with our face filter designs to make sure we have the optimum level of smoothing.
- **Face effects:** We continue to work with the FB AML team to find the best way to amplify facial features like the eyes to achieve subtle beautifying effects.
- **Standalone camera:** We continue to gather results from our Android "camera-first" shortcut test and will report back next week with findings.
- **Stories hits growth milestone as team continues to focus on new features and awareness**
 - **Growth metrics:** We hit 200M DAP! We're also up 2.2% w/w for production per dap, most of which is coming from Indonesia (Balinese New Year), Russia, and Brazil. Countries such as Mexico and Spain were down w/w.
 - **Audience control:** We continue to build a new way to narrow your audience for Stories and Feed posts. We're also organizing an effort with the Engagement team to improve friend coefficient and your "Favorites" list.
 - **Stories growth experiments:** To drive Story producer PR, we're testing several features that will generate awareness of the ephemeral camera. These include camera entry points in "Your Story" viewer and on profile, as well as a camera context interstitial triggered by a notification or IG Story.
 - **Formats:** We're building a new "Slo-mo" format to launch in late April.
 - **Stickers:** Last week, we shipped "Day of Week" stickers and on 4/13, we're set to launch sticker pinning, a new "Recents" section in the sticker tray, and a new "selfie sticker" that let's you add your facial expression to any media.
- **Unified Direct is ready for 4/11 global launch**
 - **4/11 launch:** The team successfully got everything into Sunday's cut on iOS and Android.
 - **Post-launch plans:** The team has started work on speeding up search on the camera send sheet and tombstone aggregation. We started research on making Direct more sticky through game mechanics this week. Also, we came up with a plan for overall camera unification throughout the app.
- **Latency issues with Live notifications**
 - **Live notifications:** We saw a spike in notification latency starting 3/22, which we believe is negatively affecting our broadcasts/day. There are a couple ongoing SEVs with the async tier which is affecting both IG Live and FB Live notifications. We've escalated this problem to the async tier team. We're also working on ways to make our notifications less susceptible to infrastructure capacity issues in the future.
- **Focusing on growing carousel and new features on Profile**
 - **Carousel backward compatibility:** Compatibility is at 90% for iOS and 50% for Android (blocked by crash analysis). Carousel still consuming team's time on this, as well as logging, and sentry integration.
 - **DM on Profile:** Test will launch with v10.15 on both iOS and Android.
 - **Hide/Unhide + Me-only:** Making progress in build and targeting company dogfooding in another week.
 - **Finsta Product Review:** Our review went well. We've decided to pursue both audience control and Finsta growth as two parallel tracks inspired by Finsta research and data deep-dives.
 - **Share from Stories camera to feed:** Decided to replace "Share from Stories camera to feed" test with "Replace core camera with Stories camera" test. Staffing and prioritization TBD.
 - **Audience control:** Determined audience control staffing planning with Stories team and kicked off backend work.

Engagement

	Current	Goal	vs. Forecast	
Time Spent	26.9	28	0.30%	minutes/DAP
y/y growth	22.3%	+15%	1.7%	
Home				
Stories Consumption PR	46.50%	55%		
Feed Impressions/DAP	83.3	88		
Discovery				
Live Consumption PR	8%	13.50%		
Explore Consumption PR	39%	44%		
Relationships				
Products using Coefficient	1	5		

- **Focusing on Stories and Live discovery**

- **Top Live in Home tray [iOS]:** We shipped x-ray filtering on cover photos which was a blocker and are launching a 2% test on 04/03.
- **Pre-fetching Stories:** Two months ago we started pre-fetching the first story in your tray so that it loaded instantly when you tapped on it, which at the time was +0.5% to DAP. This DAP win has continued to grow in our backtest and is now over 2.0%, with no sign of leveling off. This is another indicator of how important performance is to the product, not just for deepening engagement with existing users, but for driving topline usage.
- **Stories rings in Feed [iOS, Android].** On 03/29, we launched Stories Rings in Feed headers to 100% global, where clicking on a story ring in a feed item header launches that person's story. Early results are showing a +1.3% increase in Stories DAP vs. holdout.
- **Dynamic spacing of tray [iOS]:** Launching a 2% global test on 4/05.
- **Reappearing tray on scroll & warm start [iOS]:** We completed the polish for this feature and submitted in the latest RC. We're finalizing our test plan aiming for this week.
- **Stories Feed unit [iOS]:** We are in progress on a version of the Tray that will appear as a feed unit and are aiming to be feature complete by the end of the week.
- **Stories notifications:** We shipped the "Person A posted their first story" notification that bypasses nudge for users that have feed post notifications turned on for Person A. The volume of this notification is too small to meaningfully move metrics but was a good way for us to test the system for our future Stories Notification roadmap. We are currently working on our next two notifications: "User A posted their first story in a while" and "Users A,B,C and have new Stories today" which combined are projected to increase Stories PR by +3-5%.
- **Reciprocal follower boost:** Data suggests that seeing reciprocal follow content in Stories is a strong driver of participation. This test boosts these authors in the tray.

- **Search is supporting hashtag pages**

- **Investigating missing content on Hashtags pages:** We have gotten a number external reports (including a negative press article) about content from certain authors not appearing on hashtag pages. We believe that the people reporting this are in a "reduced visibility" state in our system (as a result of a PAC flag) that should have been temporary, but is not. We're digging into the bug and want to confirm that everything here is working as intended.

- **Improving Top Live, Multi-Author Stories and Suggested Stories experiences on Explore**

- **Progress vs. Goals (Current v. H1 Goal):** Daily Explore Participation Rate: 39% (-0.3% w/w) vs. 44% (H1 Goal). SFPLT / DAP (via Explore Posts-only hold-out): -24% vs. -30% (H1 Goal). Unconnected Live Consumption PR: 0.5pp vs. 2pp (Tentative H1 Goal)
- **Live no longer verified-only:** We have met our M2 goal of getting out of "verified-only" for Top Live without regressing quality. As of today (Monday) we will be enabling non-verified accounts to appear in Top Live. This inventory of Top Live is not only greater (we see +60% of Top Live Impressions vs. control), but it's also cleaner (-50% violating content vs. control), which is due to the application of the Author Karma Score. Karma Score will prevent accounts that have a history of IG violating content from showing up in Top Live.

- **Multi-author Stories:** [Public consumption-side test went out](#) on Thursday and early results look promising. With novelty effects still at play, location Stories have higher CTR and PR than Suggested Stories in the same tray position, though novelty effects are still in play. 41.3% of Explore visitors see a "Your City" story in Explore given inventory and whether they have turned nearby location on. The percentage increases to 46.9% of Explore visitors if location stories are available on location pages. We are cutting the creator-side test this coming Sunday. Note that Snapchat proactively announced its plans for a similar product (algorithmic location, event and topic Stories) the day after our public test started. [\[link\]](#)
- **Suggested Stories:** Shipped verified badges on iOS Suggested Stories (iOS): **+1.9%** Suggested Stories clicks, **+1.9%** Suggested Stories PR. [\[link\]](#)
- **Data insights:** We've learned that there are trade-offs between engagement and quality in our experiments. Sexual content and Explore TS and DAP are highly correlated. SFPLT and sexual content are correlated, but SFPLT and text-heavy content are not. [\[link\]](#)

Growth

	Current	Updated Goals	vs. Forecast
DAP (M)	436	476	-0.5%
MAP (M)	698	762	-0.2%

- **Improvements to reg flow, invites and email clickers lead to growth wins**
 - **Terms of Service:** We moved iOS Terms of Service from the first page to the last page in registration, leading to +7.7M MAP/year
 - **Launched retrieving FB token for Invites:** On Android, a lot of users are Facebook connected on the backend but we don't have a token available on the client. We now make a call to the backend to see if they are fb connected and if so, we fetch invite suggestion counts for badging and also do invite prefetching, which will lead to +252K MAP/year.
 - **Redirect Email Clickers:** We launched redirect email clickers to APP store when users don't have the APP, leading to +95K MAP/year (small volume but future potential as we revamp email).
- **Fixing SMS codes bug and investigating web traffic decline**
 - **SMS codes:** We worked with FB team to fix a bug that was causing users to not receive SMS codes, which led to recent churn increases. With the help of the MOSE team in Dublin we found that a recent change on Sigma (Site Integrity's engine for all user checks) to accommodate Oculus was causing a 10% failure rate for IG verification code requests. This affected ~170K users per day over ~2 week period. This issue has been resolved and we are working on more granular dashboard monitoring for SMS.
 - **Web traffic:** Web team is investigating declining web traffic. Now that we have more reliable web dashboards and can monitor web growth accounting, we have noticed a decline in web net growth. The team is actively pursuing several potential causes including PAC checkpoint/classifier issues, potential deeplinking to the app (bypassing web), and login and SEO issues (looking unlikely upon further investigation).
- **Growth teens lockdown**
 - In order to accelerate the work we are doing to reach our US Teens DAP goal of 12.1M by the end of the half, we are executing on a set of 10 teen growth initiatives during the month of April. These projects will be the growth team's highest priority. See [post](#) for more details.

PAC

	Current	Goal
% Exposed to Spam	23.51%	<=18%
Policy Precision	97%	>=95%

- [SEV](#)
 - Web signup dropped due to increase in signup classifier false positives. Classifier was rolled back immediately and deployed several stop gap solutions resulting in improvement of Web signup but not fully. Additional feature changes to fix the classifier are in progress.
- **Launching update to Help Center and a new safety tool**
 - **Help Center changes:** Launched updates to help center to guide users with access issues. Users were having trouble finding new in-app contact form to report access issues. These access issues have also increased due to recent hack attacks ([S144695](#)).

- **New feature to combat NCII launching on 4/5:** Facebook, Instagram and Messenger will be launching a new tool to proactively block NCII (Non-Consensual Intimate Image) from being distributed/uploaded. See [post](#) for more details.

Business Platform

	Current	REVISED H1 Goal	vs. Phasing
Revenue (M)	\$711	\$1,650	+0.1%
Active Businesses (M)	9.3	12.5	132%
Active Advertisers (M)	1.55	2.1	-2.2%

- **We finished the quarter strong and continue ramp on Stories**
 - **Marketplace Health:** Strong finish to the quarter with an average spend of \$9.6M per day, up 2.6% w/w. Preliminary quarter close at 111% of original sales target. Placement opt-in of 28.9%. Instagram represents 8.7% of FB Inc. revenue. Top 5 advertisers last week were Apple's "Say It with Stickers", Netflix's [13 Reasons Why](#), P&G's [Herbal Essences](#), PepsiCo for [SunChips](#) and Spotify's [30 day Trial](#).
 - **Ads in Stories Ramp:** Booked \$4.8M of \$stories ads, +\$782k for the week. Top 5 \$stories ads by impression were for Natura Brasil, AkBank, Fragmentado (Universal BR), Beldent, and Ray-Ban.
 - **Ads in Stories Supply Updates:** Our price floor in stories is customized per user and depends on auction clearing prices for that user in Feed. For users in certain countries, low demand in Feed was allowing low quality ads to deliver in Stories so we [adjusted the floor](#) to handle these cases thereby reducing impressions by 40% and increasing CPMs by 60%. To help counteract this and to start preparing for overall increases in demand, we followed up by increasing supply - we [reduced our time gap rule](#) from 12 hours to 1 hour and got +40% impressions and 19% reduction in CPM.
- **Focusing on video logging and simplifying insights stack**
 - **Video Logging War Room:** The team was heads down this week to dig deeper into our [video logging issues](#) in Stories. We found a series of issues that will be fixed in the coming weeks: under-counting view time due to not counting view time on stories that auto-forwarded, over-counting view time due to incorrect start position being logged on pauses, and low sound on being reported due to a server side bug.
 - **Insights Re-Architecture:** We [re-architected](#) and simplified our entire Business Insights stack to better support platform developer velocity, improve implicit privacy checks, and support rapid development by migrating to React Native. While this supports future scale, our short-term goal is to have negligible impact on our end users as this rolls out over the coming weeks.

Outreach

- **Top Accounts Stories Production Growing**
 - For our largest 1K accounts, 36.74% are posting IG Stories every day (+7.17% w/w). Top account story production remains strong and has been increasing over time. The top 1K are continuing to favor video content in their stories, with 0.66 photos and 1.59 videos posted per day/MAP (+4.86%, +8.89%).
- **March Madness on Instagram**
 - Monday night's championship game marks the culmination of the second season of Instagram's Student Section program. Over the course of the spring, we partnered with 30 schools to have students takeover their official Instagram story during major basketball games, while also educating them on our latest creative tools.
 - University of Kentucky junior Natalie Hesse was named the winner of the program, and we invited her to help takeover the official Instagram Story at the Final Four this weekend. To kick off the tournament, we also featured University of North Carolina super-fan Alex Koszeghy, aka "Glitter Girl", in a feed post on flagship.
 - We partnered with the NCAA to help seed content from members of the Instagram Student Section for the @MarchMadness story throughout the tournament, including a massive story during the opening round which featured varying perspectives of the "madness" from all around the country.
 - As part of our March Madness comms push, the Instagram Student Section was profiled by Sports Business Journal both online and in the outlet's print edition. Awful Announcing ran a profile on our winner, Natalie Hesse. Following our feed post on "Glitter Girl", she was interviewed by Teen Vogue, People, and USA Today College.

- Throughout the tournament, we published a "March Madness" Topic Channel that featured teams from both the Men's and the Women's tournament, as well as broadcasters, athletes, and coaches.

PEOPLE

- Thanks to [REDACTED] for their work on Stories video logging.
- Thanks to [REDACTED] for his work in leading the re-architecture of Business Insights.
- Thanks to [REDACTED] for their work on March Madness.

ME

Last day of skiing for the season this past weekend... sad to see the season go, but very thankful for the incredible snow fall we had in California. Check out this graph of the level of Lake Tahoe over the past couple of anemic years and contrast it to the last few months. If history shows us anything, the spring runoff has barely begun!

