

## **AMENDED Exhibit 52**

# **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

## H2 2018 COMMUNICATIONS PLAN - WE GET IT: MEANINGFUL CONNECTIONS

**PROBLEM STATEMENT:** Elites, academics and press often criticize Facebook's core product for being the people who use Facebook rather than the powerful connection it provides:

Addiction and social media and younger people...negative use cases

- 1 **People equals profit:** People believe Facebook uses their data for money; and that's the company's primary motivation.
- 2 **Unsafe:** People believe that their privacy, safety and well-being are at risk when using Facebook, specifically for kids and teens.
- 3 **Polarizing not connecting:** Elites do not believe that Facebook brings the world closer together and builds community. Instead, they associate Facebook with perceptions of the world's growing polarization.

**STRATEGIC GOALS:** In H2, we want to show elites, academics, influencers and press that Facebook creates meaningful, safe and authentic experiences that support sharing and connecting in ways that are important to people. We want to demonstrate that:

- 1 Facebook acts responsibly when it comes to product development, including with teens and younger children (e.g. research, working with experts, prioritizing time well spent).
- 2 Facebook Inc. is building meaningful and authentic experiences across its platforms.
- 3 People have the controls to "Make Facebook your Facebook" – key to goals 1, 2 and 3 is to use less wonky, more consumer-friendly language that leans into the change message (i.e. making changes people have requested to get back to family and friends).
- 4 Facebook helps people build supportive communities and (online and in-person).

### HOW: Build allies and work to convert critics.

- Academics: Demonstrate that Facebook Inc. cares about healthy use of its platform
  - *Key results:*
    - Expand relationships with well-being academics from H1 roundtable and convene H2 roundtable with additional well-being academics
    - Create 10 new academic allies in the fields of well-being, addiction, and teens
    - Create 5 academic press references
- Policymakers/Elites: Convene the debate and show thoughtfulness
  - *Key results:* Educate 20 policymakers on community, well-being, youth and platform controls
- Community Leaders: Expand our bench of advocates who can speak to press and policymakers

- *Key results:* Identify 5 Community Leaders who can speak to press on topics of well-being, teens/youth and community
- Facebook Alumni: Build relationships with people who believe in our mission
  - *Key results:* Establish 5 new media references from [REDACTED] alumni effort

**HOW: Demonstrate that Facebook is responsibly building safe experiences.**

• **Youth**

- Goals: 50 stories on Messenger Kids healthy interactions features (TBD); 10 stories about youth research fund announcement\*
- *Key results:* Landing "We Get It" messaging through proactive announcements (Youth Research Fund, Messenger Kids announcements around parental controls, healthy features), and reactive work that will inevitably come with the nature of youth products
  - *\*Additional goals contingent on product plans and approvals for additional Youth Research Fund*
- Messenger Kids 'We Get It' Stories
  - Art and Design Innovation: Place 2 stories around the art and tech innovations in the app (conversation prompts, SEL concepts in masks, stickers, reporting flows)
  - Human Interest: Place at least 3 stories around families who are using the app in amazing ways, such as military families, families separated by borders, or a kid who has done something incredible using the app.
  - Convert The Neutrals: Identify 2-3 influential media who are neutral on Messenger Kids (across variety of outlets) and create a custom opportunity to bring them into the fold, meet the development team, and have a dialogue in-person about the technology and safeguards in the app. Goal to increase to positive or neutral sentiment in 3 subsequent articles from these key targets.
- (TBD) Tween App:
  - Concept: If app for tween launches, ground the narrative in the research and thoughtful approach of the app, which encourages kids/tweens to have better interactions when they're together in person.
  - *Key results:* Place 50 stories around the launch of the app, with message pull through about Facebook building products that are better for kids and based on research.

• **Well-Being**

- IG & FB Time Well Spent Launch - mid-July
  - Use Kevin as lead spokesperson for IG & FB time spent launch to land coverage with key consumer, business, and tech press that enables us to demonstrate responsibility and make inroads with critics.

- Host first-ever IG Well-Being Hackathon at the SF office, featuring execs and community leaders, to demonstrate innovation in the well-being space and commitment to doing more. Press to attend.
  - *Key results:* Land 25 stories outside the tech press about FB & IG tools with message pull through about importance of making time on our apps positive and intentional; Ensure majority of press coverage includes a quote from a IG teen influencer and parent ally.
- Take David Ginsberg on European roadshow to educate press on time spent tools
- Youth: Announce TBD products coming from youth empathy team (potentially a 'Focus Mode')
- **Controls**
  - News Feed “Control Center” monthly meet ups (July-December)
    - A turn-key branded event series designed to educate consumers on how News Feed works and the controls that exist for them to personalize their News Feed experience. These will take place in local markets around the country with the goal of placing local consumer press.
      - *Key results:* 2 positive stories in national (1 print feature and 1 TV package) outlets focused on the work Facebook is doing to educate consumers on the controls they have available to them. 10 local stories in the identified local markets.
  - News Feed In-Product Education Campaign (August)
    - Send out News Feed QP that educate consumers on specific controls, how they work and where to find them. Use this as an opportunity to round up some of the education efforts we are doing across Facebook Inc. to teach people about the controls they have available for News Feed, privacy, ads, etc.
      - *Key results:* 2 positive stories in national consumer outlets focused on the work Facebook is doing to educate users about controls they have available. 3 positive pieces in DC press.
  - Broad Rollout of News Feed control 'Keyword Snooze' (August/September)
    - Keyword Snooze is a new control that gives people the option to hide posts containing specific keywords from their News Feed for a specified period of time. News Feed team will be doing a press moment in June around the initial test, but use the broader rollout as an opportunity to talk about the new control and the other controls available for people across Facebook.
      - *Key results:* 5 tech pieces and 1 SMT focused on controls, well-being and time spent.

## **HOW: Demonstrate how Facebook is building meaningful and authentic experiences across its platforms**

- **Authentic experiences**

- Launch Instagram Kindness Campaign (US-only) alongside (global) new anti-bullying product features (photo and video classifier) and new kindness feature (kind comment classifier) to demonstrate our ongoing commitment to fostering the kindest global community.
- US: Expand work of H1 #CaptureConfidence campaign; teen ambassadors and teen media accounts share their 'glow up' self care and inner beauty routines on Instagram to demonstrate the platform is a kind, safe place where you can be yourself.
  - *Key results:*
    - Land 20 positive stories in outlets read by parents, plus 10-15 teen press outlets, showing how Instagram is combatting bullying while promoting kindness and positivity on the platform. Support the campaign with kindness programming on Instagram's owned surfaces, including during Suicide Prevention Week (Sept) and Bullying Prevention Month (October).
- Facebook Bring your "authentic self" consumer press campaign
  - Community leader salon dinner for consumer press
- **Meaningful experiences**
  - FCS Well-Being track (panel, activation, breakout)
  - Groups Tab launch: help people connect better/more easily to communities that are meaningful to them
  - Instagram Civic Engagement Campaign (US only) September - November
    - Launch civic engagement campaign to encourage young people to vote and demonstrate the positive role Instagram can play in elections. Campaign will be supported by on-platform house ads, @instagram owned channels (@instagram, IGTV), and product (I Voted sticker) as well as comms and policy. Call to action will encourage teens to vote and share the new 'I Voted' sticker to their story.
      - *Key results:*
        - Campaign participation by 5-10 teen outlets on their own Instagram channels; Place 1-2 positive stories in teen outlets about our efforts to encourage and support civic engagement; Place 1 national story on effectiveness of campaign - #s of people who registered, took voting pledge, made a plan, voted after the campaign concludes.
  - **Youth**
    - "Back to school" XFN moment (FB, IG, MK)
    - Instagram Parents Education Campaign - late-August
      - Use parents of IG educational video, parents guidebook, product tutorials, and national partnerships with orgs to land positive coverage about our responsibility with young people and efforts to equip parents with tools and tips to keep their kids safe.

- US: Host 10 Instagram young community leaders who are mental health and community 'influencers' for a luncheon in MPK with execs; inviting select parenting press and mom bloggers to join.
- US: Partner with BlogHer conference (August 8-9) to scale parent education materials through an IG or community spokesperson, to an influential audience of thought leaders and bloggers.
- US + EU: Host parenting press and policy influencers for Well-Being Masterclass in collab with partner organization (i.e. Scholastic) on how to use safety tools, guidebook, and resources, plus hear from inspiring teen leaders about what they want parents to know about Instagram.
  - *Key results:*
    - Land 1 cover story (Economist, New Yorker, Atlantic), Land 1 national broadcast (Today, GMA), 10 pieces in parenting outlets, plus 1x local TV or print outlets per state (US: top 50 cities); place 20 stories with US Hispanic media; Secure 2 "halo" stories for the Instagram brand using Kevin, [REDACTED] and Adam to talk about "the parents" behind Instagram, and their commitment to making it IG a safe and positive place.
- Facebook Families Community Events
  - Concept: Execute event series across 3-5 cities in the US to educate and inform local influencers about Messenger Kids
  - Attendees: Mom bloggers, local parent influencers (head of state PTAs, school principals), local media, local policymakers
  - Rationale: People do not understand and put their support behind MK until they can experience the product and understand the approach. This will help us educate influencers on the local level and build grassroots networks of supporters.
- Facebook Youth Research Fund and Initiative
  - Concept: Gather industry leaders in youth research together to share research around kids, tech and well being.
  - Goal: Debut research findings from research fund partnership with University of Wisconsin, position FB as a leader in the space.
  - Timing: September
- Facebook PTA Digital Toolkit Campaign
  - Concept: We're working with National PTA to include a nation-wide online safety ambassador program. Through this program, we will work together to train parent ambassadors who can then go back to their home states to spread the lessons to other parents via parent nights on parenting in a digital age, culminating in a back to school campaign.
  - Goal: Announce the partnership and get positive press coverage for our work in the space of parent education- place 30 articles in the US.
  - Timing: Summer/ Back to School

## KEY MESSAGES

- We work to make people's time on Facebook (across the apps) ***time well spent***
- We work to make people's time on Facebook ***meaningful***
- Billions of people use Facebook every day to ***connect and build communities***
- We give people ***control*** to shape their experience
- We make products ***responsibly***, particularly as it relates to teens and kids

## RISKS

- We're playing catch up and people might think we aren't doing enough. Per the *New York Times* "If Facebook's underlying business model is based on how much time we all spend eating there, can the company ever truly resist the pressure to keep plying us with more cookies?" (January 2018)
- Few allies on well-being issues as well as product or policy proof points
- People don't know what controls are available or how to use them: research shows that people want controls but when we offer them they are not really used
- Increasing negative focus from UK policy makers and media on the issue of addiction. Potential to spread.

## H2 CALENDAR

- **JULY**
  - Time Well Spent launch/announcement (Week of July 16)
  - Youth Research Fund Announcement (timing TBD based on contracts)
- **AUGUST**
  - Groups tab launch
  - Instagram Parents Education Campaign Launch (August 29)
- **SEPTEMBER**
  - Announce initial results from Youth Research Fund
  - Instagram Civic Engagement Kicks Off: Register to Vote (September 4)
- **OCTOBER**
  - Instagram Kindness Campaign for National Anti-Bullying Month (US)
  - Instagram Civic Engagement Phase 2: Take the Pledge - October 8
- **NOVEMBER**
  - FCS (November 1-2)
  - Instagram Civic Engagement Phase 3: Make a Plan - November 1



- Instagram Civic Engagement Phase 4: Vote and Share - November 6

- **DECEMBER**

## **MATERIALS**

H1 Meaningful Connections campaign plan: WE GET IT: Meaningful Connection

H1 Meaningful Connections campaign tracker and results: <https://fb.quip.com/WGQFAJqIJcD8#UBQACApmrAF>

H2 Well Being plan H2 COMMUNICATIONS PLANS: WELL BEING

GOOD FOR THE WORLD: Community & Connection

Meaningful Connection H2 Brainstorm

H2 News Feed/Stories product plan: H2 2018 PLAN: NEWS FEED + STORIES

## **H1 RESULT HIGHLIGHTS**

- 6/17: Messenger Kids is launching a Code of Conduct (Be Kind, Be Respectful...) and new messaging re reporting developed with the Yale Center for Emotional Intelligence).
- Academic roundtable with 30 well-being academics. Moved 10 academics from skeptical, to neutral - positive and developed 1 strong press reference
- David Ginsberg roadshow in DC to showcase our research and thoughtfulness on the issues with policy makers, media and third parties
- 2 US and 1 EU deep-dive pieces (US targets – The Atlantic, Axios; EU targets – FT, Der Spiegel), 2 podcasts (Targets – Reply All, If Then)
- Youth Portal launch
- IG Kindness Prom: Coverage Recap: Bullying Filter & Kindness Prom
- Messenger Kids: Sleep Mode, Kindness Stickers
- Softened [REDACTED] and engaged Tristan Harris