

AMENDED Exhibit 55

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

IG Growth Update November, 2023

Unlocking new networks through school communities

TL;DR

Context Summary

OBJECTIVE

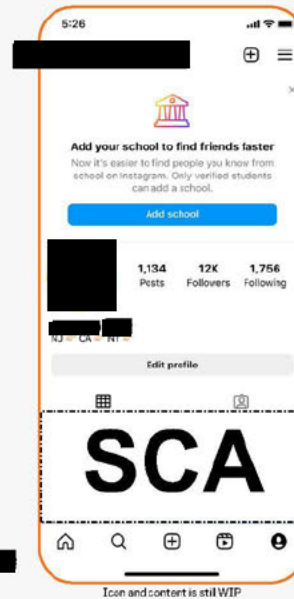
- Unlock the ability for high school and college students to discover and connect with people from school (Phase D1) [REDACTED], [REDACTED], [REDACTED], [REDACTED] [REDACTED]
[REDACTED], to give teens a new reason to join/find more value with IG.

STRATEGY

- **Redesigning the business model** to make the business more profitable and sustainable.

MEASUREMENT

- [Success] [REDACTED]
- [Opp Size] [REDACTED]
- [Success] [REDACTED]
- [Opp Size] [REDACTED]



TL;DR

Product Summary

Phase	Eng Effort	Staffing	Timeline	Goal	Measurement	What we are building	Risks
<u>PHASE 01</u> Add Your School, Find Friends	8 weeks iOS 8 weeks Android 16 weeks server	1 Android, 1 iOS, 2 Server	H124 Test	Help high school and college students find and connect with schoolmates already on IG		- A profile badge that shows to others at the same school. - SU, Search, and Discover People labels for those in your school.	
	TBD	TBD	H22024+				

TL;DR

Discussion

ARE YOU ALIGNED WITH GROWTH INVESTING IN PHASE 01 IN H12024?

- [FYI] Right now, we only want to commit to validating Phase 01 (Phase 02 is a WIP vision).
- [REDACTED]
- [FYI] Budget needed for school email verification, done through a potential partnership with UNiDAYS (email verification service, [REDACTED]).
- [FYI] Design, content, and eng have proven feasibility with several reviews and even tackled a prototype at a recent hackathon ([check it out!](#)).

Context

Why should we do it

Our current strategy of relying on power user teens to get less active friends on to IG may not be effective if **there are full communities of teens that have not yet joined IG.**

— Why US Teen DAU is declining while Session & Time are growing

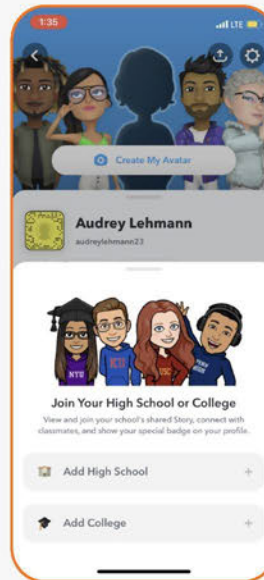
Positioning

Our competitors are exploring school communities.

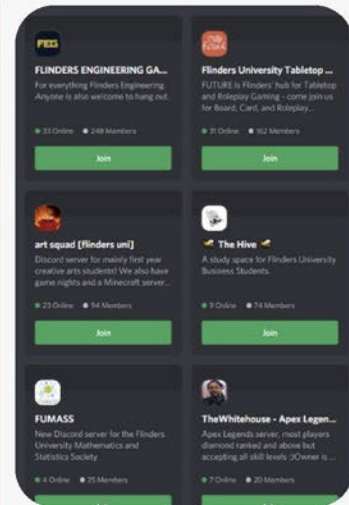
Snapchat has alluded to continued investment in communities and traction with high schools and colleges [\[link\]](#).

“We recently launched Communities, a product for private groups in which members can add friends and post to a shared Campus Story. We started with colleges and high schools and will be rolling it out to more communities over time. We’ve now onboarded 1,400 colleges in the US, and will continue expanding to more universities around the world.”

-VP of Product, Snapchat



Snapchat's communities stories shares content to your high school's graduating year



Discord allows users at a school to create chat servers around freeform topics

Why should we do it

Schools are already a top attribute about themselves that teens like to display in their profile bios



Samples:



(eg. SC, TikTok)

Estimated using regex matching

In 2024, we need to unlock these new school communities that will kickstart network connections in two phases

Phase 01:

Add Your School to Find Friends

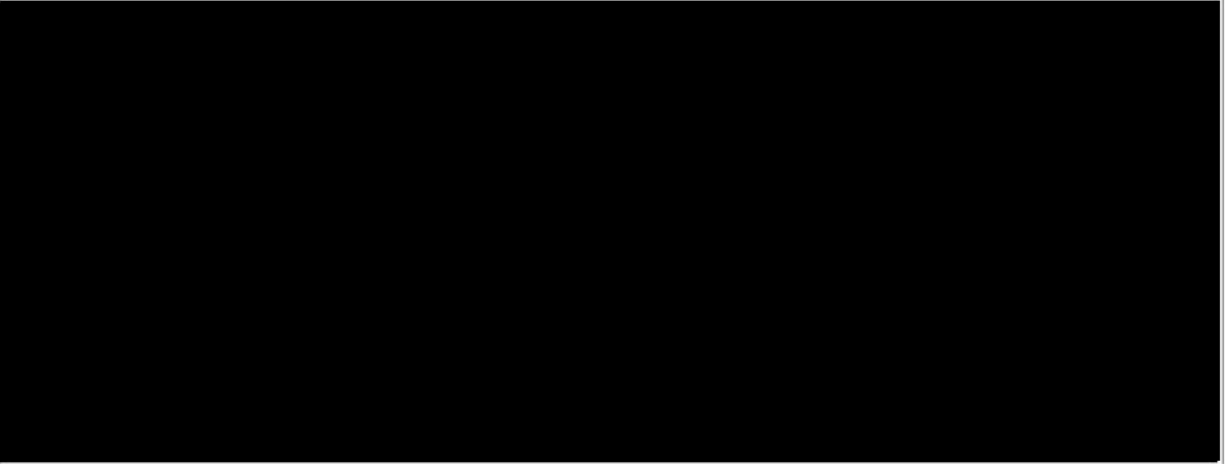
Unlock discovering and connecting with people from your school

Phase 02:



Why should we do it

In Phase 01, we expect structured school data to help improve the ability to find friends and acquaintances (especially in Search and Suggested Users), which teens are hungry for ([details](#))



Why should we do it

Teens get an app when they hear about it from friends, but they don't think their friends on are IG. [REDACTED]

[REDACTED]

([Open Questions](#) for the Phase 02 Product)



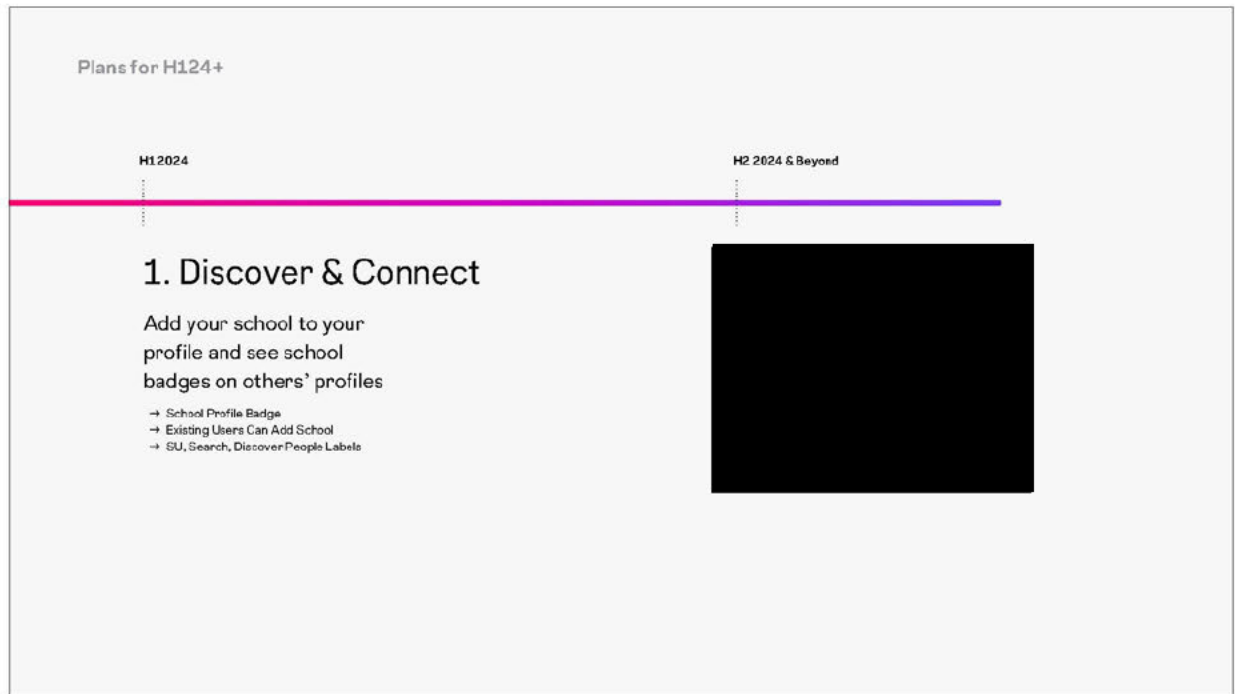
Product plan

Positioning

User problems:

- 1)** teens want to sustain or make new **connections** with classmates
- 2)** ...but they need assurance their connections are **legitimate** (i.e. others are who they claim to be)
- 3)** teens want to connect easily with looser acquaintances at school for a sense of **community**

Source: See [Building school communities for teens: insights from the past \(July 2023\)](#) for a summary of research and [Marginal Teens](#) analysis



Phase 01

H2 2023: Scoping Begins
H1 2024: Test & Validation

