

AMENDED Exhibit 70

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: Melissa Waters [/O=THEFACEBOOK/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN= [REDACTED]]
Sent: 12/8/2020 7:05:35 AM
To: Melissa Waters [REDACTED]
BCC: Distribution List for instagramhpm [REDACTED]
Subject: 📧 Instagram Marketing HPM | November 2020 📧
Attachments: Screen Shot 2020-12-07 at 10.48.09 PM.png

Redacted for PII

Instagram Marketing HPM - November 2020

🌟Top of Mind🌟

As we near the end of 2020, I thought it would be fun to do a brief roundup of the tremendous activity that came out of Instagram Consumer Marketing this year. By being nimble and #makingitwork, our team pulled off the nearly impossible.

Over the course of the year, we:

- 🚀 Launched 13 large-scale campaigns reaching 143M ONP and 80M OFP
- 👁️ Served 4.1B impressions across 730 ads ONP and engaged 3.8M clicks
- 📱 Activated 137 product features
- 🏆 Featured over 150 Creators across campaigns
- 🧑🏻 Led 100+ research studies to better understand our audiences

Given that most of our campaigns shipped in H2, their impact is still TBD. We know that IG sentiment metrics such as RCAU, GFW, [Expression](#) (fun to share), etc. have been declining due to a range of factors such as external events/news cycles and some product changes. There is a full investigation underway to better understand the drivers of the declines and the jobs to be done to remedy. We definitely have our work cut out for us in 2021 to reverse some of these trends!

To that end, we're turning our attention to next year and setting our goals for H1. We look forward to sharing more about this in an upcoming HPM.

📧The Youthful Optimist📧

This section is designed to help you better understand our core audience - The Youthful Optimist.

What pain points do Black users aged 13-14 experience on Instagram?

Qual focus groups/IDIs with Black, 13-34 y/o IG Users (n=48)

Young Black users of Instagram report experiences of cultural appropriation and race-based negativity on the platform. Coupled with perceptions of algorithmic bias (that Instagram's algorithm favors content from white users/creators) and suspected shadowbanning of Black-owned accounts (that content is demoted without an account being banned), this creates impressions that both the people on Instagram and the app itself may be biased. Black users say it is difficult to find Black-centric content. Many try to "fool" the algorithm by only following and liking content from Black-owned accounts, which helps create a more Black-centric experience and to find communities of support on the app. (More [here](#) | POC: [REDACTED])

Check out [Reels #trends hub](#), which has weekly audio and mimicable AR effects trends. (More [here](#) | POC: [REDACTED])

⚡Priority Updates⚡

This section highlights the top projects we've been working on this month to help you follow along the progress Marketing is making.

COMPLETED CAMPAIGNS

Elections

- **Election results:** We launched the [Elections Sticker New! Story](#) for National Vote Early Day and saw a [10X traffic increase to VIC web](#). The [final flight](#) of the Voter Empowerment consumer campaign ended on 11/2 with **1.37B impressions, 61.93M unique people reached, and over 300k swipe ups to the VIC**.

Instagram wide, we drove 17.4M clicks to state registration sites and estimate that we've helped 1.1M people register to vote. Since its launch in August, 76M people have visited the VIC a total of 312M times and on Nov 3rd alone we saw 24.5M visits to the VIC.

Panorama

- **Reels and Shop Tab Outcomes:** We launched new Shop and Reels tabs, a new unified camera experience, and app wide UI refresh. Our goal for this combined launch moment was to underscore how Instagram is evolving to push culture forward and highlight what's unique about these new updates to our target audiences. Our GTM plan included editorial content, in-product education to educate users about where things have moved and what's new, creator/partner outreach and activations, targeted tactics to reach Reels and Shopping audiences:

For the Reels tab, our GTM plan included [pre-briefings](#) with +300 partners, creator-led workshop for +50 teen ambassadors, buzzy editorial moment (see the [perfect reel](#)) and [in-product videos](#) in our new Reels tab NUX to educate people about the value of the new Reels tab, which reached +400M people globally.

For the Shop tab, our GTM plan included a [New! Story launch film](#) followed by a series of organic and boosted content from emerging creators in the fashion and beauty space – like [REDACTED] **Redacted for PII** [REDACTED] **Redacted for PII** – to educate and excite people about the value of the new Shop tab, reaching 500M+ globally. Follow creators like [REDACTED] **Redacted for PII** [REDACTED] who will be lighting up throughout the holidays!

INFLIGHT CAMPAIGNS AND PROGRAMS

We Make Today

- **Launch of We Make Today Campaign:** On November 16, we [launched](#) our Instagram brand campaign, We Make Today, debuting the campaign anthem film, "[Rallying Cry](#)" and coverage in [Adweek](#). In addition, we released new creator-led film activations daily from Nov 16-23. The campaign will run for 6 weeks until the end of the year reaching over 90% of US Teens/Young Adults with the goal of moving an Expression L1 metric. A truly integrated campaign that is showing up across multiple channels including:
 - Organic placement across our owned and operated channels garnering over 3.5m views
 - Instagram house ads with over 400m impressions
 - Out of home digital billboards in key markets: SF, NY, LA, PHIL, DC, BOS, ATL
 - Video ads with over 560m impressions across Hulu, ESPN, NBC, Fox and more
 - Audio ads with over 93M Audio impressions across Spotify and Soundcloud integrations

- Display ads with over 45m impressions

Beyond advertising, we are reaching teens where they already are with custom integrations:

- Genius: On Dec 4 artists like Megan The Stallion, Big Sean, H.E.R. along with up and coming musicians will use Reels to explain their lyrics in a takeover of the site.
- The Game Awards: On Dec 10 live streamed to 49m viewers, Reels will appear in the show with fans and creators using custom AR effects to highlight their favorite games.
- All American: Reels will be integrated into two episodes of the number one ranked show among 13-19 year olds. These will air on The CW in Q1 and on Netflix following.

Community Retention Campaign

- **Test Campaign Launch in Australia:** Launched a [test campaign](#) in Australia to understand if IG can drive user engagement and retention via on-and-off platform marketing channels. Goals are to drive DAP:MAP and Retention for 14d and 30d while increasing product engagement metrics for Stories **Redacted for PII** **Redacted for PII** and Explore **Redacted for PII**. This campaign runs through mid-December and will inform our scaled lifecycle marketing plans for 2021 as we look for new ways to help users across the entire user journey discover and experience the full value of Instagram. Results: campaign results will be complete in mid-december and posted in the following HPM.

Reels X Teen Ambassador Program

- **Introducing Community Experiences:** We're piloting a new way to engage with our Teen Ambassador program, by creating medium-long term community experiences for US teen ambassadors – with a focus on Reels – to drive creation. We kicked off last month with our first creator-led workshop **Redacted for PII** for +40 ambassadors, sharing tips, community lab insights, and timed with Panorama launch (~100 ambassadors got early access). Feedback has been extremely positive, with dozens of ambassadors creating and sharing reels since the workshop, stating they learned new things about reels -- full recap [here](#). Up next: December workshop timed with Remix and Holiday swag drop.

Other News...

This section outlines other changes in Marketing you might be interested in.

Consumer Marketing Reorg

On November 11th, Alex [announced a new team structure](#). High level, here are the primary changes to the marketing org:

- Creation of an integrated Brand & Product Marketing team under **Redacted for PII**.
- Combine Comms Planning & Media Investment (CPMI) and Product Growth into one function under **Redacted for PII**.
- Creation of a combined Marketing and Analytics Strategy & Operations team led by **Redacted for PII**.
- Integrated Decision Science and Insights in the same way they are combined in the Central Product Groups.

New Team Members

Our Marketing organization is growing to accommodate the needs of our business. It's an exciting time as we usher in a wave of folks. Please join me in officially welcoming seven new members to the team! (To our xfn partners, fear not: we're clustering onboarding as much as possible!)

- **Redacted for PII**, Head of Marketing Decision Science
- **Redacted for PII**, Decision Scientist, Decision Science
- **Redacted for PII**, Head of Creative, Creative X
- **Redacted for PII**, Lead Program Manager, Creative X
- **Redacted for PII**, Program Manager, Creative X
- **Redacted for PII**, Director of Product Marketing Interests, Product Marketing
- **Redacted for PII**, Integrated Marketing Manager, Integrated Marketing

Spotlight

In this section of the HPM, we will recognize teams in the Marketing org who have delivered/are delivering exceptional work. Please give a big round of applause for the folks below.

We Make Today

Shout out to [REDACTED] and the whole team that delivered the We Make Today campaign, taking what was originally a Reels launch campaign and re-positioning it into a brand platform campaign in record time.

- **Marketing:** [REDACTED]
- **CreativeX:** [REDACTED]
- **CPMI:** [REDACTED]
- **Market Research:** [REDACTED]
- **Decision Science:** [REDACTED]

Me

As the year comes to a close I can't help but feel introspective. 2020 has asked each of us to reflect on what is most important and who is most important to us. I'm grateful for the learning that has come in reflecting on those questions. One thing I know is that I'm grateful to be here with all of you (despite that I have yet to meet ANY of you!) and I look forward to taking that energy into 2021.

Want to stay in the know? Have any feedback or suggestions? Subscribe to Instagram Marketing HPM and/or let us know what you think by clicking [here](#).

Melissa Waters
VP Marketing, Instagram