

AMENDED Exhibit 809

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

[S8] Problem Statement Deck

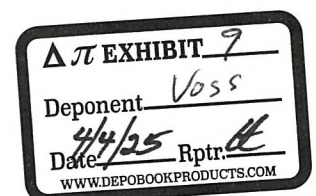
Ben

V2

V1

Research Next Steps

- "Hows" - how we can go about understanding the above
 - Taxonomy of digital spaces - positive and negative aspects
 - Online Survey on Teen values and how they relate to Snapchat
 - Online Survey of Parents
 - In-person research with Groups of Friends
 - Data Deep Dives
 - Use research to create qualitative Personas (rather than feature-based)
 - -----
 - Send designers into more schools / teen spaces
 - Day-in-the-life w/r/t apps (get screenshots from morgan)
 - Let high schoolers re-design Snapchat
 - -----
 - Go into communities to build design/user relationships
 - Digital diary
 - Online survey of digital wellness w/r/t snapchat



Ben

- Understand Teen Parents
- Need to know more about spaces people go to + what they value about them
- Need to know more about the digital / physical IRL divide and the effect of not having it
- Need a better view of friending, thoughts on IRL friends vs Snap friends
- Urban v Suburban v Rural differences
- Better understanding of teen values

V3

- Intro
- Frame
- Empathize: Who IS GenZ? (What is different about genZ?)
 - **We've heard the rumours, what's true and what's bogus?**
 - From our research
 - Gen Z In their words
 - Facts
 - Generalizations
 - From UXR
 - Reports
 - Areas of interest
 - New views of Identity
 - HMW ensure that teenagers feel like their identity is something they can experiment with and evolve over time?
 - HMW reflect the way a teenager's identity grows and evolves
 -
 - I view my identity as something that I design and experiment with, I need spaces that respect this.

- My identity grows and evolves with me and I need physical and digital spaces that reflect those changes
 - Expectation of Control
 - HMW ensure that teens have control over how they're represented?
 - I should have control over my spaces-- how I am represented, who is allowed in them,, and more.
 - No-one explained the rules / Transparency
 - HMW ensure that teens have a clear understanding of the rules
 - I need a clear understanding of what is allowed in the spaces I inhabit, so I can experiment within it.
- Research questions?
 - Need a better understanding of values and how they correspond to metrics
 - Who are the different Gen Z personas and how do they differ? How are they represented on snap?
- Empathize: What is Snapchat to them?
 - **Help us understand where we sit in their world**
 - From UXR
 - What Space does Snap occupy
 - How important are we? Time split?
 - Quotes from what they like about Snap
 - Friending research
 - Data picture
 - How they use Snap
 - 3 takeaways:
 - The map is a unique digital space that resonates with teenagers
 - Story mentions as a social friending source
 - Private Story behavior w/r/t identity
 - Areas of interest
 -
 -
 - Physical and digital spaces
 - Personas over time
 - Teenage life changes
 - Communication styles
 -
 - ~~The blurring of on- and offline - How digital and physical spaces meld~~
 - ~~I need to navigate an unclear divide between my digital and physical identity~~
 - ~~I need my digital self to reflect the growth of my physical self.~~
 - Privacy
 - ~~I need to experiment in spaces that respect my privacy.~~
 - Right to change

- I have the right to evolve and change, I need physical and digital spaces that will reflect those changes
- Research questions?
 - Friending vectors
 - How do Gen Z friend networks uniquely spread and operate?
 - Life changes/moments
 - How can Snapchat reflect the real life landmarks of teenage life?
 - What is successful about real world spaces (vs digital spaces)?
 - What real world spaces should we take tips from?
 - What is it like to always be online?
- Empathize: What are they going through?
 - Help us understand the bigger picture
 - From UXR/our research
 - Beyond numbers: what developing as a teen means
 - Mental health
 - Their relationship with Purpose
 - Areas of interest
 - Mental Health and Wellness
 - I need a supportive environment
 - Life changes
 - I need digital spaces that respond to the major events in my life.
 - Identity and purpose
 - Reflection
 - Support Systems
 - I need to receive support from my social circles when I am struggling.
 - Stress
 - HMW
 - HMW respond to the cadence of major moments in teenage life?
 - HMW: create digital spaces that promote wellness??
 - HMW: create safe spaces that allow you to try new things and develop your identity?
 - HMW: create digital spaces that discourage negative social interactions?
 - HMW create the easiest possible way to reach out to friends and peers?
 - HMW create digital spaces that provide support if you experience negative interactions?
 - HMW make teenagers feel like they are being heard during negative life moments?
 -
 - HMW reduce vectors for stress?
 - Research Questions
 - What are the most

- **Research questions?**
 - How do major milestones in teen life correspond to their digital behavior?
 - What is it like to have such varied social roots, heritage, what does it do to the sense of cultural belonging?
 - Need a deeper understanding of what events/social situations happen each year
- Define: Synthesis and open questions
 - Summary of problem areas
 - Identity
 - Online/Offline identity
 - the right to evolve
 - Wellness
 - Aligning our values
 - Opportunities for positive social connection
 - Support
 - Reducing stress vectors
 - Summary of research questions
 - What is it like to have such varied social roots, heritage, what does it do to the sense of cultural belonging?
 - What are the major changes in teen life and how can Snapchat reflect them.
 - How can we measure Snap's values and how they correspond to metrics?
 - Open team questions
 - Prioritization

- Intro
- Frame
- Self / Close Friends / Spaces
- Empathize: Self: Who IS GenZ?
 - **Debunk the rumours**
 - Facts
 - Generalizations
 - Mental health
 - *Problem Area(s)*
 - *Research questions?*
- Empathize: Close Friends: How does GenZ interact with close friends on Snapchat?
 - **Help us understand where we sit in their world**
 - Spaces/time split
 - * Quotes from what they like about Snap
 - Friending research
 - Data picture

- *Problem area(s)*
- *Research questions?*
- Empathize: Spaces: What spaces do they occupy?
 - **Help us understand the bigger picture**
 - Beyond numbers: what developing as a teen means
 - *Problem area(s)*
 - Reduce Negative Social Interactions
 - Encourage Positive
 - *Research questions?*
- Define: Synthesis and open questions
 - Summary of problem areas
 - Summary of research questions
 - Open team questions
 - Prioritization

V2

- **Problem areas summary**
 - For our Users
 - How can we understand and address core issues?
 - For the Product
 - How might Snap empathize better with what I'm going through?
 - For the Team
 - How might we design more inclusively?
- **Intros**
- **Framing**
 - The area is huge!
 - This project is a beginning not an end
 - Most statements we will be making are essentially research questions in of themselves
 - Example: we all know US, 13-18, is too broad, but it's an example of the compromises we will need to make
 - Why this sprint?
 - Go deep on our core demographic
 - Talk to as many of them as possible and build empathy with the social and human problems they face in their day to day lives

- How might we build products to solve these problems and more fundamentally empower the future generation?
 - Unique opportunity to really practice what we preach
 - Need finding, building empathy, and designing for human progress.
 - We have processes that can be improved.... (more Morgan)
- We will have a unique approach to the sprint phases
 - We have important reports still coming through
 - We want to focus on the beginning rather than on ending
 - So, graphic of normal sprint vs. this sprint (schedule)
 - We will spend time building empathy as solution
 - We will keep our stakeholders broad
 - We will (probably) have another solutions presentation
- **Discover (we're not empathizing yet)**
 - Overview
 - This has been more discovery than empathizing
 - We deal with open questions and challenges after
 - Self
 - Who are "Gen Z"?
 - Definition
 - Population size
 - Demographic splits
 - Generic attributes, assumptions
 - What are they going through?
 - Timeline overview
 - The goal of adolescence: meaning, purpose, identity, values
 - The structure of experimenting without consequence (+hence they're worse at quantifying risk)
 - They need a safe space
 - How well they're doing (vs. previous generations)
 - What having language around key issues means to them
 - They express themselves freely and explicitly
 - They seek out authenticity
 - They have a very open attitude toward mental wellbeing
 - They seek a sense of belonging, a space that is theirs
 - w/r/t Snapchat:
 - Data on Personas, UU visits by page (showing difference to average), Bitmoji creation + edits, Memories,
 - Social Connections (family & friends)
 - How do they foster friendships + make best friends
 - What are the key values for friendship
 - What role do friends play in the experiment/commit cycle
 - w/r/t Snapchat:
 - Data on friending, Snapping, Stories, Groups
 - What do they want out of Snapchat?

- Spaces + Culture
 - What role do spaces play in development
 - The difference between real spaces and digital spaces
 - The effects of digital spaces on development
 - What role does culture play in development
 - Where our increased individualism has come from
 - How it has affected our world view
 - The difference perspective of a collectivist
 - What symptoms being felt from a lack of self-reflection
- Open questions + challenges
 - What is known, what known unknowns
 - Which large research projects are dropping in March
- **Define**
 - Recap the model
 - Who we will be addressing + what are the high-level problem areas?
 - *Users – How will we continue to empathize?*
 - Where are the gaps in the design team's knowledge and how will we start to understand and address them
 - *Product – How can we address known pain points?*
 - How might we work more closely with other teams to known pain points to improve the experience + quantify/prioritize accordingly
 - *Team – How might we design more inclusively?*
 - What does it look like to prioritize the voice of key communities on an on going basis
 - For each of the above 3, what is the clear output / measure of success?
 - Prioritization + timelines
 - Questions

Next Steps Whiteboard Session

- Product focus - How can we help address known pain points?
 - As a teen The Parent/Child Relationship
 - As a parent I want better control over my child's experience, because I struggle to control my child's use of Social Media
 - What is it to both be a parent & snapchat and how do i find the language to talk about it?
 - How can we provide a safe space to experiment for young users yet also provide comfort for parents?
 - Reduce Negative Social Interactions
 - Bully Vectors - Group chat, private story exclusion, custom stickers.
 - How to reduce anxiety around social pressure, FOMO, loneliness
 - FOMO - seeing a party happening on Snap Map / Stories
 - "Left on Read"
 - Losing a Streak

- Snapping Etiquette - Who should I send this to? What's a good snap?
- Enable Positive Social Interactions
 - Comfortable adding friends
 - I have confidence to connect with others - communication is easy / low risk / fun
 - Mental health - I feel heard / connected when I am struggling
 - How might we help people reach out / be vulnerable / express themselves authentically
- Control / Privacy
 - Control of my experience
 - Privacy - confident my data belongs to me
 - Blocking users UX
- Right to Change
 - Right to change - my identity on snap grows with me
 - Self confidence - body issues / thinning lenses / bitmoji body type
 - Creating a safe space to experiment and shedding identities
- Spaces to experiment / Identity
 - How to understand rules and risk without accidentally running into them
- User / Research - what can we do this sprint
 - "Whats" - things to understand more about
 - Understand Teen Parents
 - Need to know more about spaces people go to + what they value about them
 - Need to know more about the digital / physical IRL divide and the effect of not having it
 - Need a better view of friending, thoughts on IRL friends vs Snap friends
 - Urban v Suburban v Rural differences
 - Better understanding of teen values
 - And an understanding of our own values
 - "Hows" - how we can go about understanding the above
 - Taxonomy of digital spaces - positive and negative aspects
 - Create Qualitative Personas (rather than feature-based)
 - Online survey on teen values and how they relate to Snapchat
 - Online survey of parents
 - In-person research with groups of Friends
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 - Send designers into more schools / teen spaces
 - Day-in-the-life w/r/t apps (get screenshots from morgan)
 - Let high schoolers re-design Snapchat
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 - Go into communities to build design/user relationships
 - Digital diary
 - Online survey of digital wellness w/r/t snapchat

- Team - changes / opportunities going forward beyond this sprint
 - ~~Diversity~~
 - ~~Diversify design team to reflect user base~~
 - ~~Create “empathy guidelines” – best case review process for projects~~
 - ~~How might we introduce inclusive design principles into our work flow~~
 - ~~Team Space~~
 - ~~Move our offices next to a school~~
 - ~~Teen consultants in office :)~~
 - ~~Team Discussions~~
 - ~~Friday meetings – continue user-based discussions~~
 - **Measurement of impact**
 - **How might we start tracking / create metrics for core demo values?**
 - **Regular surveys on happiness / values**
 - Value Alignment
 - How might we find a new north star to create healthier social spaces?
 - Re-do four pillars of mission statement
 - How to our values map to features of the app?
 - Articulate how our values translate to emotions people feel while using app
 - Explore and match our own values to that of core demo
 - ~~Research Immersion~~
 - ~~What does it mean to have designers immersed in research?~~
 - ~~Advocate for research resources~~
 - ~~More prototype testing within sprint cycle~~
 - ~~Longer research time in sprint~~
 - ~~Investigate best UXR practices for sprint cycle~~
 - ~~Plan for UXR in advance of sprints~~

V2 - Define: Problem Areas, Research Questions, and more (oh my)

- “Left on Read”
 - Product pain points
 - Bully Vectors - Group chat, private story exclusion, custom stickers.
 - How to reduce anxiety around social pressure, FOMO, loneliness
 - FOMO - seeing a party happening on Snap Map / Stories
 - “Left on Read”
 - Losing a Streak
 - Snapping Etiquette - Who should I send this to? What’s a good snap?
- Enabling more positive social interactions... Promote social connection

- Product pain points
 - Comfortable adding friends
 - I have confidence to connect with others - communication is easy / low risk / fun
 - Mental health - I feel heard / connected when I am struggling
 - How might we help people reach out / be vulnerable / express themselves authentically
- Control/Privacy
 - The Right of Control
 - Product pain points
 - Control of my experience
 - Privacy - confident my data belongs to me
 - Blocking users UX
- The Right to Change/Identity
 - Product pain points
 - Right to change - my identity on snap grows with me
 - Self confidence - body issues / thinning lenses / bitmoji body type
 - Creating a safe space to experiment and shedding identities
- Providing a Safe Space for Experimentation
 - The Right of a Safe Space
 - Product pain points
 - How to understand rules and risk without accidentally running into them
 - Self expression...
 - Self reflection...
 - looking back at a past self with empathy. Providing a path for gr
- Parental experience
 - Product pain points
 - As a parent I want better control over my child's experience, because I struggle to control my child's use of Social Media
 - What is it to both be a parent & snapchatter and how do i find the language to talk about it?
 - How can we provide a safe space to experiment for young users yet also provide comfort for parents?
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 - Need a better view of friending, thoughts on IRL friends vs Snap friends
 - Urban v Suburban v Rural differences
 - Better understanding of teen values
 - And an understanding of our own values
 - Need to have a better understanding of Teen & Parents of teens

V1

- **General points**

- This project is about Inclusive Design
 - This demo is only a fraction of our user base (a powerful one, no doubt)
 - What we're trying to do here is find key insights for a subset of users that will change how we bring value to everyone
 - It is not universal design because we're intentionally limiting the focus on challenging users
 - It is still user-centric, since we're focusing on a user cluster

- **Intro**

- AHHH! HUGE!
- Framing
 - This is a huge topic
 - This project is a beginning not an end
 - Most statements we will be making are essentially research questions in of themselves
 - Example: we all know US, 13-18, is too broad, but it's an example of the compromises we will need to make
 - How we will structure this sprint differently to other sprints
 - Could do nice visual of how we differ from normal Plan, Design, Build phases of Sprint detailed here (eg ours could be Plan, Define+design, Define+build)
 - More immersive research techniques
 - More open-ended outcomes
 - How we will use the d.school steps

- **What is life like?**

- *Let's start by empathizing with our audience*
- Headlines
 - What culture thinks of Gen Z
 - What pressures are on them
- Life timeline
 - Developing my identity
 - Adolescence is a time for....
 - What am I going through?
 - When do I start my digital life?
 - How am I developing as a person
- Spread of cultures, backgrounds, identities that make up Gen Z

- Data picture
 - How do we find these users act?
 - How different are they to the general population?
- Existing research picture
 - What are these users thinking about, feeling, reacting?
 - What pressures are they under?
- For the Solutions Phase our output from this section will be X
- *If we think about these as symptoms, what is the larger picture?*
- **Values, Spaces and Wisdom**
 - *Having looked at the who, how do we begin to create a framework for addressing the why? Psych 101!*
 - What is adolescence?
 - The role of commitment and experimentation
 - Purpose → identity → values
 - How and where experimentation occurs
 - The role of spaces to experiment with values
 - The role of culture in building value sets via shared wisdom
 - The effect of abundant exogenic and ideological commitments on your ability to define your personal values
 - What external factors are affecting adolescence?
 - Culture is becoming increasingly individualistic
 - People are less empathetic, more likely to victimize, to act with hostility to failure or weakness
 - Themes like neoliberalism and the meritocracy are deeply embedded in the world around us and this is bleeding through to society
 - This focus on perfectionism at all costs doesn't reward people taking the time to focus on their own personal values
 - The effect on people's mental well being is clear; pressure to succeed, lack of support, lack of purpose, meaning
 - What is the contribution from digital products?
 - Digital spaces reduce flexibility and limit experimentation
 - As we use these spaces more, so our ability and desire to experiment reduces, meaning less self-reflection and more aimlessness
 - This is the foundation for why "Social media" is shown to increase depression
- **What About Us?**
 - *Having a better understanding of the who and why, let us take a moment to reflect on the how. As the creators of the system, the ones who choose the compromises that lead to the inflexibility, how do we think about values, spaces and our role?*
 - What values do we have?
 - Mission, company values
 - Team values, aspirational values
 - How are these perceived?

- What are our perceived qualities/values from external view points?
 - How are we differentiated from other social services
- PUNCHLINE

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