

AMENDED Exhibit 821

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

Bitmoji Comms Plan

2H 2019

Last Updated: July 30, 2019

Goals

- Drive Bitmoji awareness and adoption
- Build third-party/partner interest
- Reinforce Snap as thought leaders in digital identity
- Solidify Bitmoji as synonymous with the digital avatar, especially as competitors begin to double down on their avatar offerings

Strategy

- Increase visibility of Bitmoji in the consumer space, firmly cementing Bitmoji's place in the greater cultural conversation
- Educate third-parties about the value of Bitmoji and demonstrate partner success
- Pursue speaking opportunities and seminal story opportunities to reinforce Bitmoji as the definitive leaders in the world of avatars and digital identity

Tactics/Pitch Angles

Phase I (Q3 2019)

Consumer Media Pitch: 10 Times Bitmoji Perfectly Nailed my Emotions

- **Goal:** Pitch a listicle or a "we asked readers" piece to compile a list of times that Bitmoji said it all without further explanation.
 - From the time that your crush gave you a compliment *swoon*, to the millionth time you and your best friend said the same thing at the same time "two peas in a pod", there's always a Bitmoji that communicates exactly what you mean.
- **Timing:** July, tapping into a summer angle of using Bitmoji to talk to your friends, even while traveling
 - Targets: Gen Z/Millennial lifestyle outlets like Sweetie High, Seventeen, Elite Daily, Hello Giggles
- Pitch a more male-focused version of this story to remind readers how Bitmoji helps guys in particular express their emotions in an instant, and bring their digital identity along with them from text, to Snapchat, emails, and even your Venmo notes.
 - Targets: Men's lifestyle outlets like BroBible, Hypebeast, Maxim

"Back to School" Summer Media Mailer

- **Goal:** Keep Bitmoji top-of-mind among teen-skewing lifestyle media and introduce them to the many ways they can use Bitmoji to personalize their back-to-school style and communicate with their friends.
- **Timing:** Late July/Early August
- Mailer to include postcard that introduces various points of engagement with Bitmoji, including:
 - Customize your style with personalized [Bitmoji merch](#) available at store.snapchat.com for iOS users, and through the Bitmoji app for Android users

- Use your Bitmoji to talk to your friends/classmates and show your “true self;” your Bitmoji can perfectly encapsulate your experiences and keep you close to your besties
- Use Bitmoji through Snapchat, email via text to personalize how you and your friends talk to each other in different forms of communication
- Play Bitmoji Party and Bitmoji Tennis to engage in high-energy, fun competitions with friends, with your own Bitmojis at the center of the action
- Mailing items to be customized to each reporter’s Bitmoji and include relevant back-to-school items from store.snapchat.com, including Bitmoji t-shirts, notebooks and pouches.
- Targets: Seventeen, Teen Vogue, J-14, Hypebeast/Hypebae

Consumer Media Pitch: How to install the Bitmoji Chrome extension

- **Goal:** Land a media placement that informs readers on how to communicate with Bitmoji through email by installing the Bitmoji Chrome extension.
 - You’ve got your Bitmoji keyboard set and your Snapchat linked to Bitmoji too. But did you know you can also include Bitmojis in emails? We’ll show lifestyle outlets how easy it is to bring your Bitmoji along with you to communicate your emotions in an instant.
- **Timing:** September, positioning the pitch as a way to keep emails fun and fresh post-summer
 - Targets: Women’s lifestyle outlets like Redbook, Woman’s Day, Family Circle

Lifestyle/Careers Media Pitch: Behind-The-Scenes with Bitmoji Stories

- **Goal:** Invite a top lifestyle or careers reporter to visit the Bitmoji office for a behind-the-scenes look at the making of Bitmoji Stories.
 - Story opportunity will include an interview with Ba to discuss how Bitmoji Stories has resonated with millions of fans across the globe by putting their own Bitmoji at the center of the action
 - Set the stage for Bitmoji TV by alluding to continued innovation around the storytelling format
- **Timing:** Late September, helping to drive a steady drumbeat of coverage leading into New York Comic Con; potentially time story to run on National Comic Book Day (Sept. 25) for additional news hook
- Targets: Sheila Marikar (L.A.-based freelancer for Inc., The New Yorker and more), Vox, NY/LA Mag, etc.

Phase II (Q4 2019)

Bitmoji in Pop Culture: New York Comic Con

- **Goal:** Sustain visibility for Bitmoji and keep the brand in the greater cultural conversation through a presence at New York Comic Con, the East Coast’s largest pop culture event.
- **Timing:** Oct. 3-6
- Host a Bitmoji printing station in the lobby of the Javits Center, allowing attendees to bring their own Bitmoji to life through personalized merchandise.

- Consider a panel opportunity with Ba Blackstock on the development of Bitmoji, starting from a comic creation platform and evolving into the leader in avatars.
 - Sample panel description : Comic books have brought us some of the most beloved heroes in the known universe. But what if the greatest superhero of all is really...you? Hear from Ba Blackstock, the creator and CEO of Bitmoji, about reinventing comics as a form of digital identity by placing *you* at the center of your own adventures. In this session, you'll learn about Bitmoji's roots as a comic creation platform and how it has evolved to help people communicate and let them experience their most authentic selves - all through the power of the avatar.
- Knowing that attendees have ample downtime at NYCC as they wait in line for panels, consider having Snap Games serve as an "in-line entertainment sponsor." A team of brand ambassadors will engage crowds during wait times and encourage them to enjoy the multiplayer, competitive fun of Bitmoji Party and Bitmoji Tennis.
 - Note: PMK able to hire street team reps to serve as BAs, if needed
- Coordinate on-site interviews with key gaming and entertainment media (e.g. Polygon, IGN, Game Informer, Mashable, etc.).

Fast Co. Innovation Festival

- **Goal:** Highlight Bitmoji as the definitive thought leader in the world of digital identity through a speaking opportunity at Fast Company's Innovation Festival. The event brings together thousands of attendees for five days of panel and keynotes focusing on creativity, leadership, social good and technology. Speakers include a range of celebrities, influencers and C-Suite executives.
- **Timing:** November 4-8
- Ba's speech would focus on the insights that drive Bitmoji to be such a powerful representation of identity, and the innovation that led to Bitmoji to become a worldwide phenomenon.
 - Submission info can be found [here](#). Requirements include 2-3 sentence speaker bio, topics Ba would address, and additional background information about Bitmoji.
 - Potential to explore additional opportunities for AR/camera platform.
- Explore editorial opportunities with Fast Co. and other outlets in attendance, such as a profile with Jeff Beer, who covers the intersection of technology, entertainment and creativity.

Industry Media Pitch: Bitmoji Gets into Games

- **Goal:** Pitch a tech or games industry sit-down meeting with Ba and John Imah on the heels of the first Bitmoji for Games partnership announcement. Work with partners to align on announcement strategy (e.g. potential exclusive or briefing several media under embargo; exact strategy will be determined based on partners and timing)
- **Timing:** TBC
- **Targets:** The Hollywood Reporter, VentureBeat, TechCrunch

Bitmoji TV Support

- **Goal:** Highlight how Bitmoji TV is poised to transform the world of digital avatars and solidify Bitmoji as the definitive leader in the space.
- **Timing:** Mid-to-late November
- Invite key media to preview Bitmoji TV under embargo for a category exclusive opportunity to drive in-depth stories at launch that tell the greater story about the vision behind this new form of entertainment.
- Briefings will include: a sneak peek of a Bitmoji TV episode (featuring the reporter's own Bitmoji); interview opportunities with Ba about the vision behind Bitmoji TV; and any additional news (such as breaking the name of a celebrity cameo)
- Targets to include:
 - **Entertainment:** Variety, THR
 - **Tech:** The Verge, WIRED
 - **Mainstream News:** LA Times, CNN, Reuters
 - **Consumer/Lifestyle:** Refinery29, BuzzFeed

Digital identity thought leadership pitch

- **Goal:** Continue working with Wired's Arielle Pardes to tell the story of why Bitmoji is poised for the winner-takes-all race for the world's favorite avatar.
- **Timing:** TBC

Additional Creative Ideas

Note: revisit for future activations, as these ideas may be out of scope for immediate future

Bitmoji Gets Into The Game

- **Goal:** Generate greater consumer visibility for Bitmoji and reach new audiences through shareworthy activations in the world of sports.
- **Timing:** Kick off in early September timed to the start of NFL season (season starts Sept. 5)
- **Bleacher Report Bitmoji Series:** Bleacher Report is one of the most influential sites for millennial and Gen Z sports fans. In addition to traditional sports coverage, they are known for creative content series, such as [Game of Zones](#), which parodies basketball players as Game of Thrones characters.
 - Timed to the start of NFL season, we can work with Bleacher Report to create a weekly series of animated content featuring top NFL players as their Bitmojis. Content can also be made available on Snapchat in the Discover tab.
- **NFL stadium integrations:** We can tap into the fanfare surrounding the NFL by offering football fans the opportunity to see themselves on the big screen in Bitmoji form in fun halftime videos.
 - By submitting their Snapchat handles, attendees will have the chance to be featured in a customized Bitmoji Story, alongside players' Bitmojis, on the Jumbotron during halftime at games.
 - We can couple this in-stadium activation with a partnership on Discover, where NFL fans can star in Bitmoji Stories with top players.
 - Leverage partnership to generate coverage among sports/soccer media (e.g. ESPN, Sports Illustrated, local soccer writers), in addition to business media opportunities.

Bitmoji In Fashion

- **Goal:** Bring Bitmoji to the forefront of fashion and culture through strategic partnership opportunities. Leverage Bitmoji's expansion into the fashion world to drive coverage among men's and women's lifestyle outlets.
- **Timing:** Align with holiday shopping timing (October-November) for inclusion in gift-guide and retail coverage cycle
- *Note that there is potential to consider similar activations for other new or refreshed partnerships available in-app*
- **Forever 21:** Partner with a Gen Z-skewing shopping destination like Forever 21 to integrate Bitmoji with fashion and retail (note that Gen Z shoppers do largely [like in-store shopping](#))
 - At select stores in major markets, introduce a Bitmoji fashion station where consumers can purchase real-life versions of looks available in-app. By purchasing select looks, consumers will also receive a patch to customize the outfit with their own Bitmoji.
 - For an extra degree of personalization and to tie Bitmoji to the holiday gifting season, print customized wrapping paper featuring consumers' own Bitmojis or those of their family/friends.
 - As a plus-up at highly-trafficked stores, produce an interactive "Bitmoji booth" that captures a photo and transforms the consumer into a Bitmoji-esque image. Through the "Bitmoji booth," shoppers will be able to virtually try on different outfits that are available in-app (see [virtual closet trend](#) for inspiration).
 - Note that this would not need to link to the consumer's actual Bitmoji; instead, it would transform them into digital avatars modeled after Bitmoji, similar to viral activations like the "[Mad Men Yourself](#)" tool.
- **Levi's:** Levi's is the biggest denim brand in the world and one of the most iconic names in fashion. Aligning with Levi's on a partnership opportunity that lets consumers customize their jeans and denim jackets with patches of their own Bitmoji will help elevate brand awareness and visibility, and bring Bitmoji into the greater fashion/cultural conversation.
 - Partnership would live on the Bitmoji and Levi's websites, where consumers could share their Bitmoji to receive customized apparel. We would also send customized denim jackets to key lifestyle reporters to drive awareness of the partnership.
- **Van's:** Similar to the Levi's concept, Van's is at the forefront of custom culture and remains a relevant and enduring footwear brand. By partnering with Van's to allow consumers to customize shoes with their own Bitmoji, we will help elevate consumer visibility and drive men's and women's lifestyle coverage.
 - Consider debuting Van's partnership by selling the shoes at ComplexCon in Long Beach in November (exact dates TBC). Complex is one of the most popular media outlets among Gen Z, and participating in ComplexCon will help integrate Bitmoji into the greater fashion and cultural landscape.

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