

AMENDED Exhibit 854

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

Snapchat Content Experience for 13-17 year olds

ranking@

TL;DR: This document explains the efforts we have in place to protect users younger than 18 from inappropriate content on the app content consumption products: Discover Feed, Search and Map.

Overview

In this document we try to answer the following questions:

- What does Snapchat consider inappropriate content?
- What does Snapchat consider inappropriate content to show to <18 year olds?
- What techniques do we have in place to do proactive content policy enforcement?
- What techniques do we have in place to do reactive content policy enforcement?
- What happens when things go wrong i.e. overview of past escalations and how we addressed them?

The sections below are describing the mechanisms we have in place at Snap to enforce our content policy and how each of the content consumption products have implemented these protections. This quick summary table can serve as a guide for the rest of the document.

	Discover Feed	Search	Map
Content policy	Yes	Yes	Yes
Proactive moderation	Yes	No	Yes for curated stories only
Reactive content removal	● All reported snaps are reviewed by T&S ● We remove content that has been flagged by more than X users automatically	● All reported snaps are reviewed by T&S ● We remove content that has been flagged by more than X users automatically	● All reported snaps are first removed and then reviewed by T&S ● We remove content that has been flagged by user automatically

Commented [1] I wouldn't say the map content is proactively moderated. We only proactively moderate the titles of events and the first few snaps in a cluster, not the whole cluster. The snaps can change over time, like a Search story. The only map content that is 100% vetted are the curated (edited) stories.



Algorithmic takedown of content violations (Nudity, offensive words, etc.)	Model built by search team to detect NSFW	Model built by search team to detect NSFW	NSFW model, also quality models
Place moderation	● Filtered stripclubs ● Filtered schools with kids < 13	● Filtered stripclubs ● Filtered schools with kids < 13	● Filtered stripclubs ● Filtered schools with kids < 13

Content

Discover feed contains

- Publisher content from partners
- Stories created by popular users (celebrities, etc.)
- Stories that a user subscribes to
- Algorithm generated stories (events, topics, places etc.)
- Curated stories created by Content team
- Ads/Sponsored content which have their own guidelines

Search contains

- Algorithm generated stories (events, topics, places etc.)
- Stories created by popular users (celebrities, etc.)
- Curated stories created by Content team
- Publisher content from partners

Map contains

- Curated stories created by Content team
- Labeled event stories that are not curated
- Random snaps posted around a place

Commented [2]: Is this content reviewed under the same guidelines? I do not think it includes 'innappropriate for <18' tags.

Commented [3]: it is not reviewed proactively but we trust our partners to abide by our content guidelines given we have very comprehensive deals with them that includes commitments to abide by guidelines and they have money on the line. that being said we do reactive moderation to tiles in the feed and if we get complaints.

also, publishers are able to set editions to be 18+. this was a requirement in a lawsuit we settled. we police them reactively and ask them to make stuff 18+ if they dont

Inappropriate Content (general public and <18 year olds)

Snap Content Policy is provided by Trusty and Safety team and is respected in each content consumption product. Content that falls into these categories are removed from all consumption products once discovered.

- Sexually explicit content and nudity
- Harassment, Threats and Bullying
- Invasion of Privacy
- Violence
- Hate Speech
- Dangerous or Harmful Activity

Commented [4]: here are the publisher guidelines. <https://docs.google.com/document/d/1fHXalrogFR0L-D5IX0fxqxHSpB-MjzwTRMp-CBVaRa4/edit#>

Commented [5]: thank you [REDACTED] I requested access. I am trying to figure out if an edition like "Did Cardi's BFF Leak Black Chyna's Sex Tape?" would be marked as 18+ under these guidelines.

Commented [6]: not sure. [REDACTED] was this edition marked as 18+? should it have been?

Commented [7]: This would be okay to show to all users. Graphically describing what is in the sex tape could warrant gating but just talking about a 'sex tape' as a concept is okay.

- Self-harm and Suicide
- Terrorist Content

Apart from that, content falls into these categories should be removed.

- Depictions of minor nudity (also includes fictional or cartoon sexual depictions of minors)
- Solicitation of a minor
- Minors smoking marijuana
- Minors holding/using weapons (including guns, knives)
- Bulges for minors/over-the-clothes simulating masturbation
- Harassment, threats and bullying depicts or is targeted at minors < 18
- Minors in physical fights
- Person in a private space (bathrooms, classrooms, locker rooms, inside residential house who likely did not consent to being recorded)

Commented [8]: Need double check with T&S

Commented [9]: [REDACTED] Do we have other scenarios?

Commented [10]: minor nudity also includes fictional or cartoon sexual depictions of minors.

Also: minors smoking marijuana, minors holding/using weapons (includes guns, knives), bulges for minors/over-the-clothes simulating masturbation, content from inside classrooms (privacy), minors in physical fights

Commented [11]: could you elaborate 'classroom'? I suppose it only has primary school/kindergarten etc.

Commented [12]: Classrooms are a 'protected area' where people can assume to have privacy. Here's our policy:

Privacy - Delete Snap if showing

Person or people in a private space: bathrooms, classrooms, locker rooms, inside their home who likely did not consent to being recorded

Proactive Moderation

Moderators in Content and Search team use moderation tools to moderate all the content (Public User Story, Map Story, Our Story etc.) before they're pushed to Discover feed. Besides contents that violate our content policy, moderators also remove contents in the following categories from Discover feed proactively:

- Low quality or irrelevant
- Animal violence/Human violence
- Certain dangerous or harmful activities including drugs, alcohol and tobacco
- Self harm and suicide
- Newsworthy content
- Intellectual property
- Brand safety
- Pro sports or sponsored content
- Thumbnails

Full guidelines [here](#).

Reactive content removal

In Snapchat, a user may report any content (Public User Story, Map Story, Our Story etc.) and all the user reports will be reviewed by the Trust & Safety team in time. Any snap in the following categories must be removed curated stories and auto-generated stories if discovered:

- Sexually explicit content and nudity
- Harassment, Threats and Bullying
- Invasion of Privacy
- Violence
- Hate Speech
- Dangerous or Harmful Activity

DOCUMENT SLIPSHEET

Bates Number: SNAP0681967-SNAP0681970

Custodian: BONIAKOWSKI_JEB

Author:

Filename: SNAPCHAT CONTENT EXPERIENCE FOR 13-17 YEAR OLDS.DOCX

Create Date: 2/26/2018 3:38 PM

Last Modified Date: 8/6/2018 12:00 AM

TNAG BEGBATES:

TNAG ENDBATES:

MAAG BEGBATES:

MAAG ENDBATES:

File Path: /SNAPCHAT CONTENT EXPERIENCE FOR 13-17 YEAR OLDS.DOCX