

AMENDED Exhibit 889

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

US 13-17 Action Plan**3/3**

- [Impact of Friend Story and Lens Engagement on DAU](#) [REDACTED]
- [Product Roadshow Deck](#) [REDACTED]

2/28

- High School Check-ins^[K1]
 - HS check-ins have declined Y/Y in all states YTD vs last year
 - California leads the absolute decline and % decline in HS check-ins among the top 10 states by average daily check-ins. Absolute decline is not unexpected as CA is the largest DAU state, but % decline of [REDACTED] vs a [REDACTED] national average is surprising
 - Within California, both LA and Bay Area exhibit strong Y/Y YTD declines

US National Level

State	'22 vs '23 YTD Avg Check-in Delta	'22 vs '23 YTD Avg Check-in Delta (%)
TX	[REDACTED]	[REDACTED]
CA	[REDACTED]	[REDACTED]
FL	[REDACTED]	[REDACTED]
IL	[REDACTED]	[REDACTED]
OH	[REDACTED]	[REDACTED]
NY	[REDACTED]	[REDACTED]
PA	[REDACTED]	[REDACTED]
NC	[REDACTED]	[REDACTED]
GA	[REDACTED]	[REDACTED]
MI	[REDACTED]	[REDACTED]
Other	[REDACTED]	[REDACTED]

California State Level

Region	'22 vs '23 YTD Avg Check-in Delta	'22 vs '23 YTD Avg Check-in Delta (%)
Los Angeles	[REDACTED]	[REDACTED]
Bay Area	[REDACTED]	[REDACTED]
Other CA	[REDACTED]	[REDACTED]

- Product DAU Planning

Page 1 Comments

K1

Next Steps:

- Compare to GB/CA as baselines
- Normalize for underlying decline in overall stickers/venue filter usage
- Isolate specific high schools and look at Y/Y trends
- Focus user research on California 13-17 cohort

██████████, 2/28/2023 01:44 PM

- Product Research:

Compared to the US overall, **California and Florida Teen Snapchatters were less likely to say Snapchat was the app they used most** to interact with friends in the last month, supporting Growth's hypothesis that CA and FL teens, in particular, are impacting DAU decline. At the competitive app level, California teens show a slightly higher preference for Instagram while Florida* teens show a slightly higher preference for [REDACTED]. However, both fall short vs their phone's native chat app as the platform they use the most to interact with friends. Responses indicate that [REDACTED] is not a huge competitor at the moment, ranking the lowest of the platforms listed.

	US Overall	California	Florida*
<i>Apps considered 'must haves' to interact with friends [MS]</i>			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
<i>App used most to interact with friends in the last month [SC]</i>			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

2/21

- Action Items
 - Review how DAU and friending growth grow together
 - Break down incr. DAU goals in product dau table into relevant feature metrics (reach and freq)
- User research - [softening](#)
- User research [13-17 never user gender cut](#)
- US 13-17 Product DAU Planning ^[JS]

Page 2 Comments

K2

[REDACTED]
[REDACTED] We gathered product initiative sizing for most of the "Angles of Attack." Upperbound is roughly [REDACTED] US 13-17 DAU by [REDACTED] [REDACTED] For context, we've lost roughly [REDACTED] US 13-17 DAU in the past year, so if we hit on these we'll make up that amount.

Assigned to [REDACTED]

[REDACTED] [REDACTED], 2/10/2023 04:36 PM

K3

We recalibrated our US Friending Improvement assumptions and raised the upperbound by 400K to get to 1.2M total incremental DAU across our "angles of attack". Friending and Communities look like our biggest potential winners if we can achieve our OKRs.

[REDACTED] [REDACTED], 2/17/2023 11:29 AM

D4

we are certainly very focused on US friending and agree it can help with this younger demo. [REDACTED]

David Boyle, 2/17/2023 12:53 PM

J5

Good to know friending is one of the key leverages here. US friending is our top 1 OKR this year and have and will keep prioritizing features that can potentially improve friending in US especially the younger cohort.

[REDACTED] [REDACTED], 2/17/2023 01:05 PM

<u>Feature</u>	<u>Core Area</u>	<u>New / Existing Users</u>	<u>Rollout Timing</u>	<u>Est. US 13-17 Q4 2023 Incr. DAU</u>	<u>PM Owner</u>	<u>DS Owner</u>
OPS/Invites	Activation	DNU	Q1 - Q4	0 - 0.02M	[REDACTED]	[REDACTED]
HS Communities	Friend Stories	Both	Q1 - Q3	0.3M	[REDACTED]	[REDACTED]
Save Friend Stories in Chat	Friend Stories	Existing	Q1	0M	Abby Tran	[REDACTED]
US Friending (Improve 10% Y/Y)	Friending	Both	Q1 - Q4	0 - 0.64M	[REDACTED]	[REDACTED]
Lenses	Lenses	Both	Q1 - Q4	TBD	Mariia Apanovich	[REDACTED]
Improve Streaks (Paid Restore)	Messaging	Existing	Q2	0 - 0.1M	Abby Tran	[REDACTED]
Snapchat AI	Messaging	Both	Q1	0 - 0.15M	Abby Tran	[REDACTED]
Improve Streaks (Hourglass Feature)	Messaging	Existing	Q2	0 - 0.02M	[REDACTED]	[REDACTED]
Desktop Web (Safari)	Messaging	Existing	Q2	0 - 0.04M	[REDACTED]	[REDACTED]
Creator Code Red / Camera Initiatives	NFS	Existing	Q1 - Q4	TBD	[REDACTED]	[REDACTED]
Content Sharing in Chat	NFS	Existing	Q1 - Q2	0 - 0.006M	Abby Tran	[REDACTED]

- Build summary deck on insights and actions

2/7

- Analysis Updates
 - [DS Updates](#)
 - [Impact of locked accts](#)

- Lenses [workplan](#)
- UXR Softening research - expecting report 2/6; [13-17 never user gender cut](#)
- Marketing
 - I had an exploratory call with the head of comms for San Diego Unified School District that could help us optimize and scale the rollout of Communities for HS... that's something that could serve as 1) valuable user feedback for the product and deeper understanding of how this core demo is thinking about Snapchat -- do we want to float specific qs to the district to survey for us? 2) scale the rollout of this product to several campuses when ready.
- Next steps?

Action Items:

- Global gender review internally and for competitors
- Pull results into an overview deck incorporating data work + user research

2/3

- Analysis Updates
 - [DS Updates](#)
- Content Team Updates ^[D8]
- Lenses [workplan](#)
- UXR Softening research - expecting report week of 2/6 (2/10); [13-17 never user gender cut](#)

Action Items:

- Evan's ask: "What is the impact of locked/deleted accounts in the US?"
- Is there a 13-17 opportunity with spotlight (do 13-17s fall across both modes of the bimodal spotlight distribution or are they all deeply engaged)
- Follow up on where notifications are on the driver coefficients for L30=30
- Separate notfs into growth/transactional
- Why have lenses become more important to lower engaged users in 2022
- Engaged friending workplan?

1/30

- Analysis Updates
 - [Lenses](#)
 - Gender ^[M10]
 - Creators
 - De-averaging metrics from last presentation
- Content Team Updates ^[D13]

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- D6 [REDACTED] -- you available to give an overview of 13-17 US content trends?
David Levenson, 1/30/2023 09:32 PM
- M7 Cool if I copy+paste summary from the slides i made last week for this? trends aren't dramatically different. And I haven't done additional analysis yet.
[REDACTED] 1/31/2023 09:45 AM
- D8 yep -- better to just get the narrative from you
[REDACTED] 59 AM
- D9 [REDACTED] -- were you able to cut your research by gender?
[REDACTED] -- any updates for tomorrow?
David Levenson, 1/30/2023 09:32 PM
- M10 Yining is cutting the 13-17 Never User data now, updated in the next couple of days. Still waiting on the Softening User research to wrap, which will have gender cuts - expected 2/6
Morgan [REDACTED] 48 AM
- D11 [REDACTED] -- you available to give an overview of 13-17 US content trends?
David Levenson, 1/30/2023 09:32 PM
- M12 Cool if I copy+paste summary from the slides i made last week for this? trends aren't dramatically different. And I haven't done additional analysis yet.
[REDACTED] 1/31/2023 09:45 AM
- D13 yep -- better to just get the narrative from you
David Levenson, 1/31/2023 09:59 AM

Action Items:

- Evan's ask: "What is the impact of locked/deleted accounts in the US?"

1/25

- [DS Updates](#)
- Product positioning for GTM planning on new features
 - Lean into "fun" messaging where it makes sense in our product growth campaigns to combat the perception that Snapchat is boring compared to other platforms ([source](#))
 - Can we get resources to overhaul the New User Onboarding experience and update messaging to be more relevant to 13-17 year olds.
- Content Team Updates

Action Items:

- Gender deep dive
 - Morgan to cut softening research by gender
 - DNU by gender
 - Validate we see lens declines across other US age cohorts and other markets to rule out lenses being a specific driver here
- GTM planning
- De-average metrics analysis for various age cohorts to understand which metrics are more impactful to retention
- [REDACTED] to share bullets on content
- Evan's ask: "what is the impact of locked/deleted accounts in the US?"

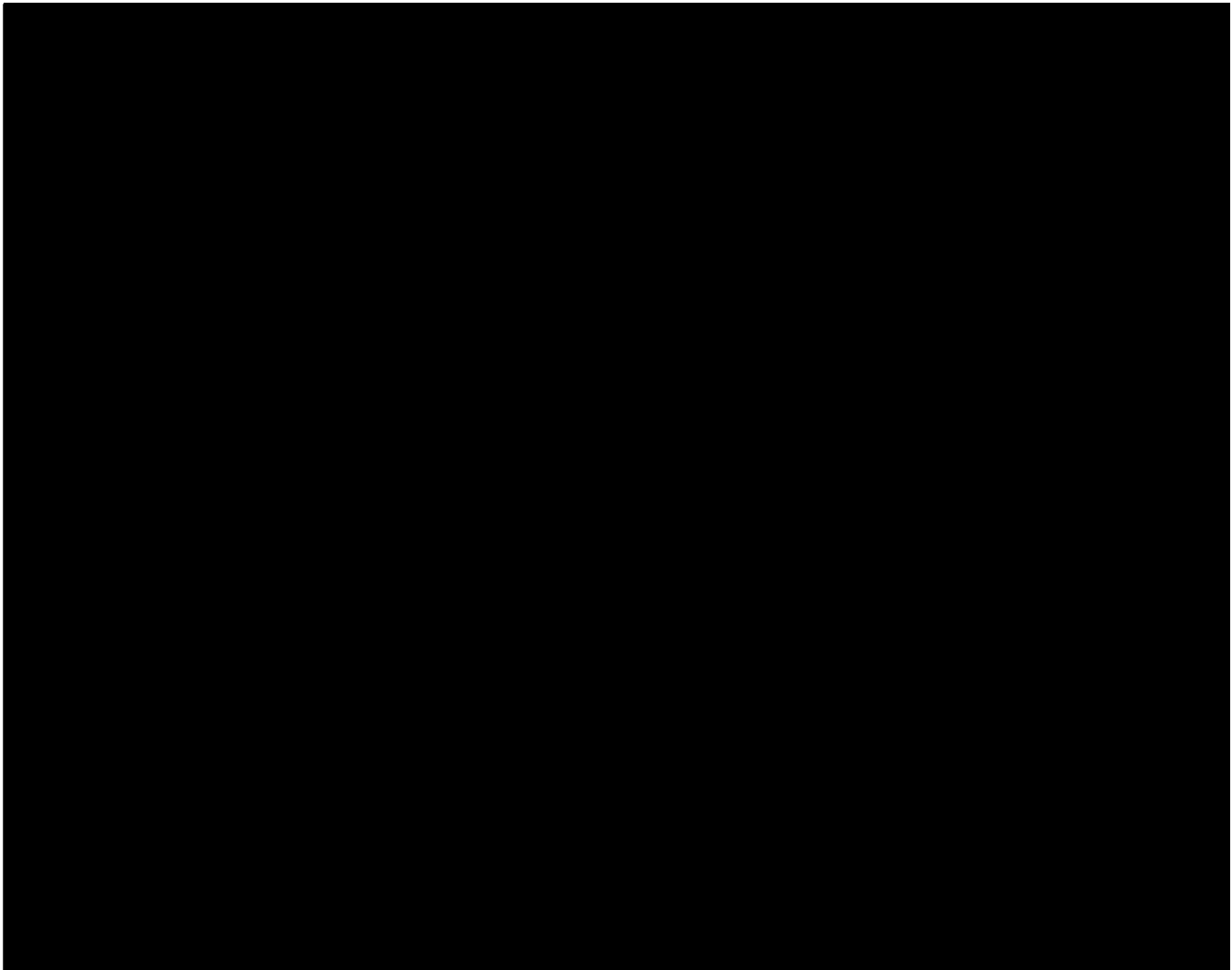
1/17 Agenda

- Kick-off w/ problem statement
- Review themes from existing work
 - DNU and DAU/MAU
 - UXR Themes
- Angles of Attack
- Add'l DS and UXR work?
- Attendees

Problem Statement:

Baseline and actual DAU in NA has been on a decline since ~Sep 2022 (back-to-school). The trends continued through Q4 and we have lost about [REDACTED] actual DAU (with [REDACTED] of which caused by the pulseDB migration). More concerning is the continued declining trends as shown

below. The issue is very much a US issue both in volume (US is 10x CA and MX) and % (only the US is showing such large YoY declines)



Growth Accounting Investigation:

Summary:

- The top contributors of the US 13-17 DAU Y/Y decline from July to November:
 - i. Declined new user active days (30%)
 - ii. Decreased users changing ages to 13-17 (37%)
 - iii. Decreased active days for retained users (20%)
 - iv. pulseDB causing country changes (11%)
- The slow down of retained user active days may correlate with the decreased engagement on Lens and Chat activities.
- Fewer users changing ages to 13-17 contributed to the 13-17 DAU decline, but fixed age and country DAU does not look as concerning.
- 13-17 New user active days drop is driven by a decrease in DNU volume, which is across all ages from 13-17, but age 17 has the highest volume decline rate.

- We have fewer 13 year old US users (birth year 2009) on Snap, compared to birth year 2007 or 2008 when they were 13 years old. 54% of the gap can be explained by users changing birthdays, but 36% of the gap is still unexplained, suggesting that we may still have lower adoption and engagement for this cohort.

We kicked off investigations into root causes in Q4 and have allocated the magnitude of the issue across a few growth accounting buckets. Data science did a comprehensive [analysis](#) attributing the declines to inputs (DNU, DAU/MAU, Age in/out, etc). The below table allocates the impact:

	Sum from 5/30 to 11/26 2021	Sum from 5/30 to 11/26 2022	Difference 2022 vs. 2021	Contribution
New	46.3	36.8	-9.4	31%
Resurrection	10.5	10.1	-0.4	1%
Age in	24.5	13.2	-11.3	37%
Country in	13.9	15.7	1.8	0%
Retain Change	10.3	4.4	-5.8	19%
Churn	-33.9	-29.6	4.3	0%
Age out	-50.3	-49.3	1.0	0%
Country out	-12.8	-16.7	-3.8	12%
Delta	8.4	-15.3	-23.7	100.0%

- Age in are impacts from users not changing their birthdates back into the 13-17 cohort from
- New is the impact from fewer new users joining the app and new users engaging less when they do join
- Retain change is existing users engaging less on a month over month basis (think declining DAU/MAU)
- Country out is likely due to the impacts of pulseDB repositioning users based on updated IP address mapping

The most concerning declines are coming from New and Retained – these are real engagement declines due to lower engagement. Age in is an impact we need to monitor to ensure users “stuck” in other age cohorts are still engaging properly and to try to properly allocate them to the right age bucket using good inference models.

UX Research

The UXR team also kicked off some studies to understand user-level behaviors for users and non-users

- 13-17 Never Users ([link](#))
- Teen competitive pulse [survey](#)

Research Summary

- Competitive dynamics come up frequently – Tiktok specifically but also iMessage
- Entertainment value from social media becoming increasingly more important to young users
- Snapchat is still important for interacting with friends and communication, but between asynchronous communication, younger users are switching to entertainment platforms
- Parental controls / school bans might be becoming more of an issue (maybe post-COVID impacts)

Existing Users:

- 29% of Snapchat teen users believe they use Snapchat less often in the past 2 months because 44% believe "it became boring," 25% say "I'm busy and have less time overall," then 17% say "my friends don't use it as much"
- TikTok is a major competitor: 70% of respondents include TikTok in their top 3 platforms with highest time spent (77% of Snapchat stated 'Daily' + 'Weekly' users and 78% of declining Snapchat users chose TikTok for highest time spent as well) and 39% cite it as their top favorite app
- 57% of Snapchat stated 'Daily' + 'Weekly' users find themselves using TikTok more in the last 2 months because of its entertainment value and relevance of content that feed their boredom
 - More teen respondents have seen ads/notifications/emails about trying new features from TikTok (38%) than from other platforms (given that more teens overall use TikTok)
- Teen respondents' top platforms they spend the most time on include TikTok (70%), YouTube (59%), and Instagram (50%). Snapchat shortly follows (48%). These top 3 platforms provide a lot of consumption and entertainment value. For Snapchat stated 'Daily' + 'Weekly' usage, they spend the most time on TikTok (77%), Snapchat (66%), and then YouTube (50%)
- 38% of teen respondents think Snapchat is the top platform for interacting with friends and 38% for having the highest number of friends to communicate with (top among platforms)
- 4% of teen respondents saw a recent ban of Snapchat at school, while a total of 24% noticed they have an active school ban of Snapchat (slightly more than other platforms) - however 23% of responses were "I am not sure" - potentially increasing the ban percentage
- BeReal is not a huge competitor at this moment - only 21% are stated 'Daily' + 'Weekly' usage

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K14 THIS I'd love to dig into if there's more data to contextualize. Is it the perception based on creative we're putting out in-app, or actual lack of interest in the product offering? Which I'd imagine is more of an education opportunity for us to emphasize the value props they care about.

██████████, 1/24/2023 02:21 PM

D15 Perceptions of whether a network is active tends to have a large impact on engagement. Probably one of the most important things we need to solve

Private Story Posting sees a fairly large change in the US last summer whereas it was up or equal to 2020 and 2021 in Jan 2022 it is now down compared to 2020: <https://lk-search.sc->

corp.net/

<https://lk-search.sc->

corp.net/

Same is true on the maps in friend availability: <https://looker.sc-corp.net/merge?mid=YzQ4CU3gcF0EXBFQ1lR46h&toggle=dat,mrp,vis>

1/17/2023 12:05 PM

K16 Feels like featuring/surfacing up products like Communities and Group Chat would be beneficial to remind them of a larger network on the platform. Maybe there's also a grassroots campaign we can run with some of the high schools attached to that rollout to really boost awareness/onboard at scale? cc [REDACTED]

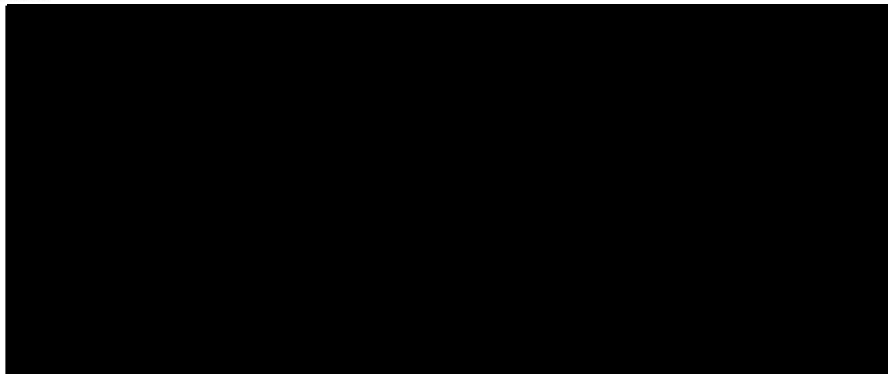
1/24/2023 02:14 PM

Never Users Summary

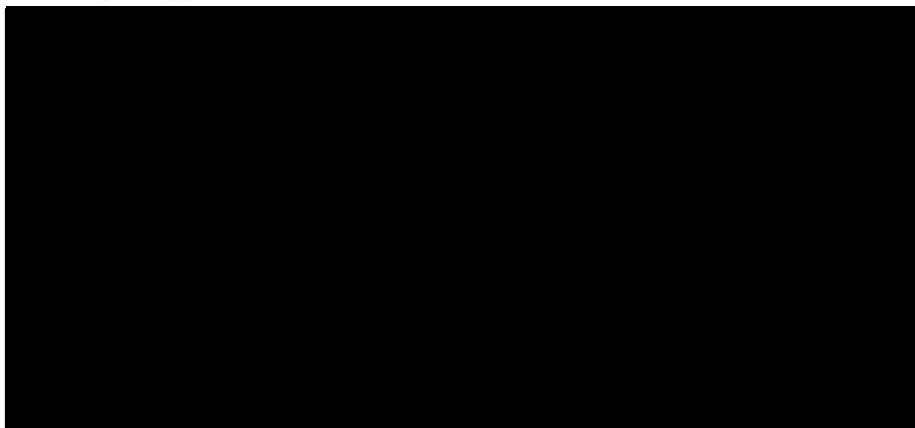
- Social values of Snapchat appeal to and retain 13-14 never users, but they have trouble understanding Snapchat is used for those use cases
- Being the true self and connecting with people sharing similar interests are appealing value propositions to 13-17 never users
- 13-14 never users have strong social needs but their social needs are satisfied by Text/Messages and Instagram
- Entertainment competitors take away users' time from Snapchat, but what's more concerning is that users start to form core Snapchat use cases on those competitors
- 13-14 never users have strict parental control over what social media they use; a lot of never users are busy with school and life

Other considerations:

- Issue appears to be limited to NA – 13-17 in EU is flat after adjusting for PulseDB migrations



- GB, for example appears much healthier than NA



Angles of Attack^{J17}

- Improve entertainment value of Snapchat to compete with TT, YT, IG
 - a. [HS Communities](#)^{J21} (P0)
 - b. [Creator Code Red](#)
 - c. Review list of creators targeted at 13-17 demo^{J24}
 - d. Spotlight as a growth lever
- Minimize issue of asynchronous communication causing gaps in usage
 - a. [Content sharing in chat](#)

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- J17 Thoughts on top near-term feature priorities:
(1) HS Communities
(2) Content sharing in Chat (namely, forwarding)
(3) Streaks hourglass features
(4) Save Friend Stories in Chat (can move needle for Story posting)
Jeremy Voss, 1/17/2023 11:46 AM
- J18 Our goal is to start testing this by end of Feb and launch to 100% by end of Q1 in US
Jeremy Voss, 1/16/2023 10:07 PM
- L19 is there anything that can be done to move this timeline up?
[REDACTED]s, 1/18/2023 10:11 AM
- L20 Hi [REDACTED] our current estimate is end of Feb but we are working on a staffing plan this week to see if we can move the timeline up to mid to early Feb.
[REDACTED] [REDACTED], 1/18/2023 01:25 PM
- K21 Do we have contacts at any HS (or districts) where we can go after more of a hands-on network marketing approach on-site?
[REDACTED] B [REDACTED], 1/24/2023 02:23 PM
- L22 DS to take on looking at creators who overindex in US 13-17
[REDACTED] [REDACTED], 1/18/2023 10:14 AM
- D23 [REDACTED]
David Levenson, 1/19/2023 01:26 PM
- J24 yes, chatted with [REDACTED] and his team will be working on it.
[REDACTED] e [REDACTED], 1/19/2023 02:41 PM

- b. [Save FS in chat](#)^{T27}
 - c. Bring chat surfaces onto content screens in a mutli-mode format
- Retain status as best communication platform for best friends
 - a. [US Friending](#)
 - b. [Improve streaks](#)
 - i. maybe need more thinking here and more approvals
 - c. Off-platform sharing - is there a 13-17 angle? Is this a huge growth vector for 13-17?
 - d. Web - growth and removing requirement for mobile device to sign-in
 - e. Chat wallpaper - launch basic product broadly?^{S30}
 - f. [Generative profile backgrounds](#)
 - g. Groups work for 13-17?
- Address parental concerns and school bans (secondary theme)
 - a. [Chat text reporting](#)
 - b. Comms/marketing outreach for Family center^{L31}
- Fitting into a "busy life" with more competition and more life events post-COVID
 - a. [Web growth](#)
 - b. Other access points? Tablets, watches?
- Ensure we have strong accounting for age in users to size the problem
 - a. New inference models?
 - b. Track DNU
 - c. Track Age In
 - d. Go deeper on age? Region? Device?
 - e. Go deeper on engagement behaviors using in-app data
- GTM support for all major features
 - a. Paid UA
 - b. Team SC / In-app / House Ads
 - c. Cost/legal be damned for SMS / invites
 - d. Brand marketing
 - e. Targeted outreach to specific demos
- Other hypotheses to run down?^{T34}
 - a. How important are lenses/AR to this demo?
 - i. 2% of cohort are CLs / 1/3 of DAU lens snap create
 - ii. More impactful for DNU
 - iii. Action Item: Review where declines are coming from engagement-wise (CLs? lenses?)
 - b. How do 13-17 year olds discover snapchat^{Y35}
 - i. Does OPS matter for this cohort? Preloads? Paid UA? Friending?^{Y36}
 - c. Are younger users using more access points – tablets, watches, web?
 - d. Are there specific content types that resonate with younger users that we have? That we don't have?

Follow-ups

- Lens () – are declines coming from lenses and is it seen in DNU and DAU/MAU?
 - Develop AR theme
- Accounting dashboarding/reporting ()
 - New inference modeling (Boyle)
- DS^{D37}
 - Should female-led declines be its own theme? ()
 - Gender follow-ups – female lens usage declines ()

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T25 What is FS?

1/23/2023 02:45 PM

D26 Friends Stories

David Levenson, 1/23/2023 02:57 PM

T27 Thank you, and an appeal to spell out acronyms in first usage if possible.

1/23/2023 03:03 PM

J28 We do plan to ship a more basic version to all Snapchatters this quarter

Jeremy Voss, 1/16/2023 10:08 PM

D29 Are there stats on adoption for existing SC+ users? Does it play well with younger users?

David Levenson, 1/17/2023 08:08 AM

S30 Yup - roughly 75% of 13-17 adopt Chat Wallpaper as per this dash -- compared to roughly 40% of others: <https://looker.sc-corp.net/>

1/17/2023 11:48 AM

L31 DS to take on looking into family center adoption and impact on US 13-17 usage.

1/18/2023 10:15 AM

T32 What about becoming better as an entertainment platform and offering bi-modal (chat over stories/spotlight) capabilities so that usage isn't single-mode?

1/23/2023 02:46 PM

D33 I attempted to capture this exact theme in the second bullet (minimize issue of asynch communication causing gaps in usage). We have a few features roadmapped that bring content into chat (sharing content via chat and saving Friends Stories in chat) but will add bringing chat into our content surfaces which is the natural corollary.

David Levenson, 1/23/2023 03:19 PM

T34 SGTM and thank you.

1/23/2023 03:32 PM

Y35 This can be partly addressed by this

graph: https://docs.google.com/presentation/d/1ESjLO2VILmWqfz5DWImOWii3_Z4HE3iR5ROLO0nc6QI/edit#slide=id.g19c4a3d2f34_1_492

1/18/2023 10:26 AM

Y36 I have some survey data that can partly address

this: https://docs.google.com/presentation/d/1ESjLO2VILmWqfz5DWImOWii3_Z4HE3iR5ROLO0nc6QI/edit#slide=id.g1e6321415e5_0_0

We can grow on desktop web and tablets for sure.

1/18/2023 11:40 AM

D37 - I think you are both actioning on this already. Let's depri the post-COVID behavior

- do you think it's worth kicking off the story post downstream analysis to try and tie this all back to stories declines?

David Levenson, 1/18/2023 09:30 PM

- What is our entitlement with declining birth cohorts using census data
 - DS to take on looking into family center adoption and impact on US 13-17 usage (from LE)
 - Post-COVID behavior with schools open
- GTM - [REDACTED] to follow-up
 - How to target demos and blow out are channels
- Content – Dave to work with them on themes
- Access Points (Boyle/[REDACTED])
 - Tablet work coming in Q1
- UXR
 - Morgan has some follow-up research: Softening, parents
- Attendees
 - Add lenses and content [REDACTED]