

AMENDED Exhibit 894

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

DOCUMENT SLIPSHEET**P-SNAP-0257**

Bates Number: SNAP0017949-SNAP0017954

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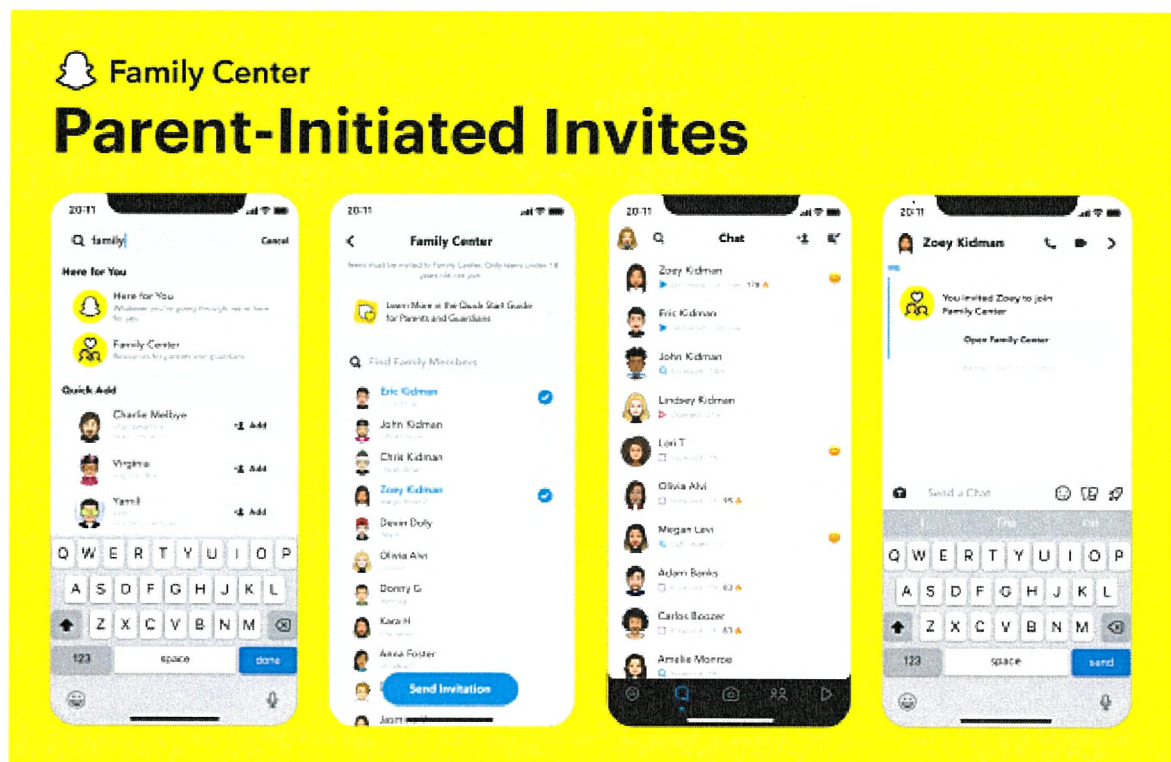


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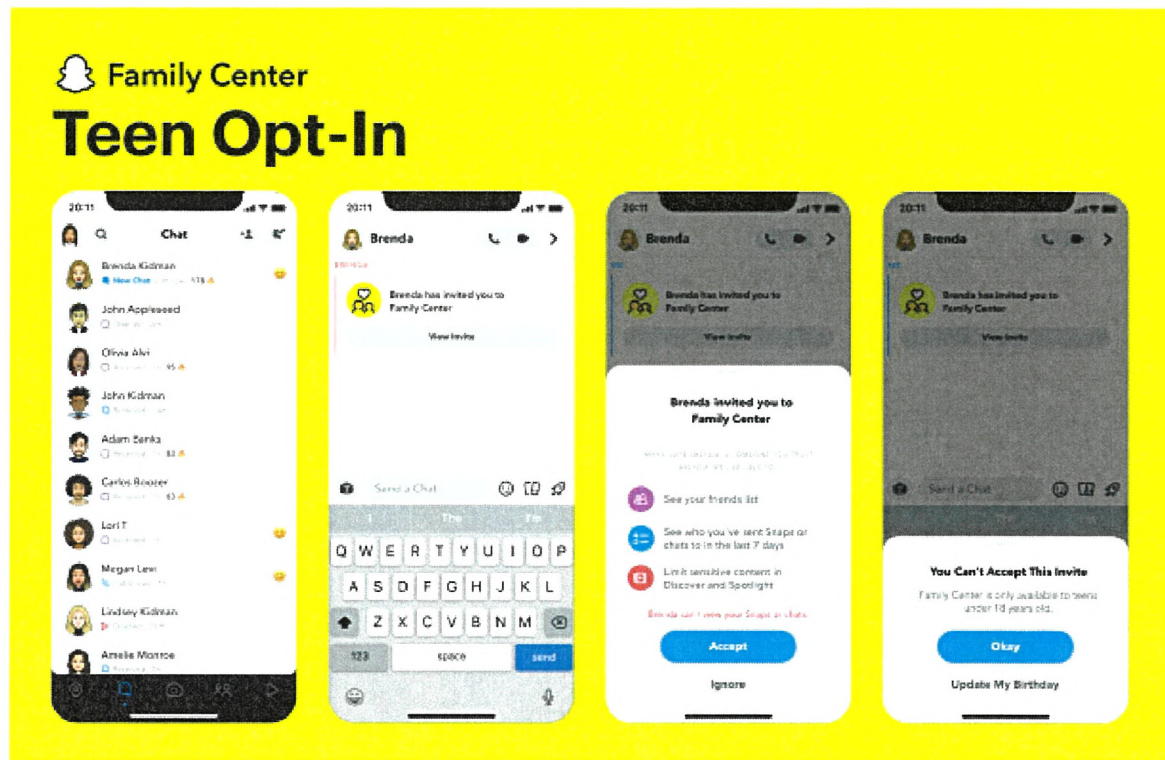
SAB In-Person Convening: Product “Think” Topic Family Center

Product Leads: Abby Tran, Alex Osborne

1. **Executive Summary.** Snap is deeply committed to the safety and well-being of our community. In an effort to make the in-app experience safer for minors, we launched [Family Center](#) with the hope that it sparks dialogue between parents/caregivers and their teens to enhance their safety on the platform. This “Think” Topic seeks SAB perspectives and feedback on Snap’s Family Center — specifically, how can we improve the current feature set, expand it with new functionality, and super-charge adoption.
2. **Background.** We launched [Family Center](#) on August 9, 2022, with a core feature set, allowing parents to invite teens to join and giving them insight into who their teens have messaged in the last 7 days and who they are friends with on Snapchat.
 - a. **Inviting Experience:** Parents 25+ can initiate Family Center from their Settings page or from Search. They are able to send invites to their teens if they are friends on Snapchat.



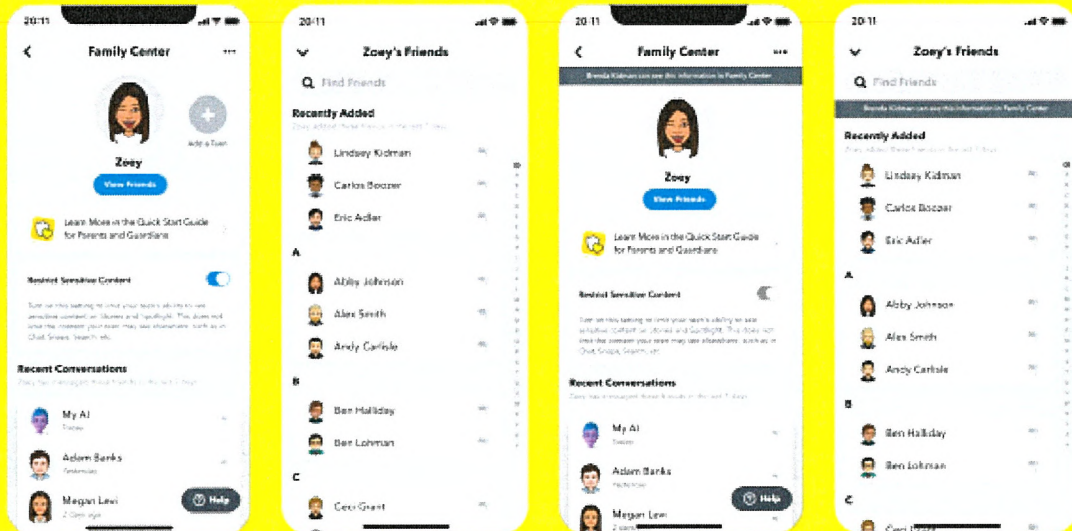
- b. **Accepting Experience:** Teens 13-17 will receive a private message from their parent/caregiver with a Family Center invitation. Tapping on this will provide an explanation of the feature and a prompt to accept. Teens 13-17 are able to join, while those “18+” are blocked and given the opportunity to correct their age so as to appropriately fall under the permissions for Family Center.



- c. **Family Center Experience:** Once parents have linked their teens' accounts, they are able to review their teens' profiles, which, as of March 2023, include Content Controls (which filter out suggestive content from Discover and Spotlight, the more public areas of Snapchat); Recent Conversations (which shows who the teen has sent a message to in the last 7 days, without exposing the Snap or chat content); Friends' List (which shows who the teen is friends with, along with a Recently Added section for new friends made in the last 7 days); Reporting (which allows parents to report any potentially violating accounts); and Resources (which routes to our Parents' Guide to Snapchat and to our Help Center). Teens are able to see a mirrored view of what their parents/caregivers have access to.

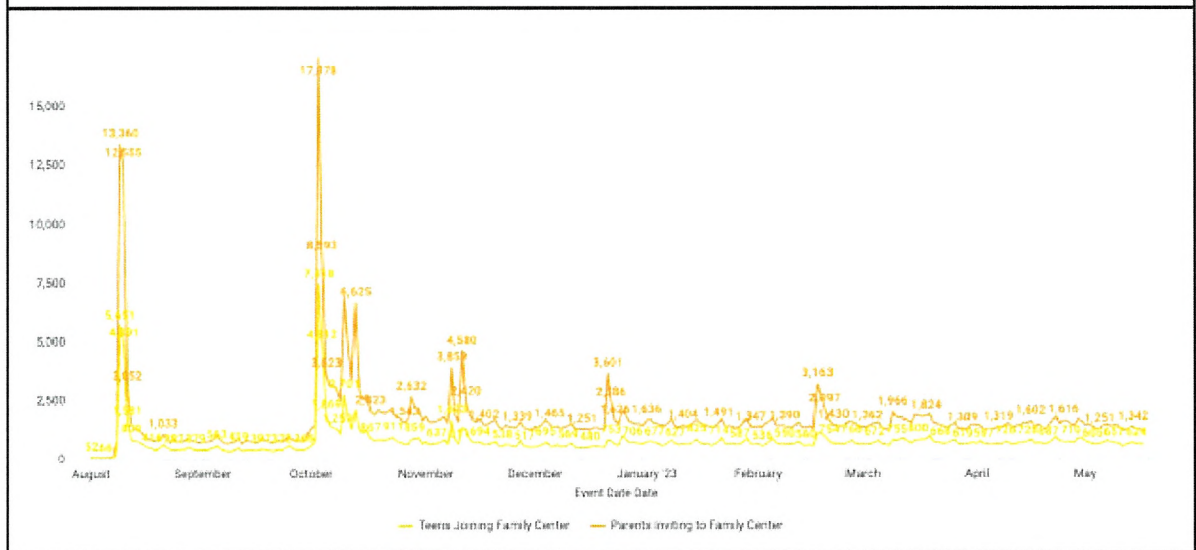


Parent and Teen Mirrored Views



3. Challenges.

Teen and Parent Adoption of Family Center Over Time



- a. **Parent Awareness.** Almost 500,000 parents have sent a Family Center invite since launch, but our latest user research shows that parents' awareness of Family Center remains low. Only 1,400 parents send a Family Center invite each day, with 97% of them finding this entry point through a relatively obscure Settings' section. Only 3% of invites are sent from Search; this is unsurprising since parents must have prior knowledge of Family Center to query Search in this way. Family Center is extremely hard to find in the app, and we also have two major challenges when attempting to reach parents: 1) it's difficult to know which of our 57 million +35-aged Snapchat users are parents



of teens, and 2) it's difficult to reach parents of our 60 million 13-17-aged Snapchat users, who they themselves, are NOT users of the app. (We hypothesize that this is the majority case).

- b. **Teen Adoption.** After our initial spike in sign-ups during the launch of Family Center, adoption has stabilized at modest levels. About 60M of daily Snapchat users are 13-17 years old, representing 15% of our total user base. While ~200K teens have accepted invitations and joined Family Center, this makes up only about 0.33% of all Snap teens. Only ~750 teens join Family Center on a daily basis, with a 27% invite-to-accept rate.
 - c. **Utilization.** Once parents have onboarded their teens to Family Center, the frequency in which they return to check on their teen's profiles is low, as the onus is on the parent to remember to regularly monitor their teen's profile and activity. On a daily basis, about 4,700 parents view their teens' Family Center profiles, or put another way, only ~2.35% of teen profiles are reviewed each day.
 - d. **Perception.** The primary ways we've marketed Family Center have been via announcements on our [Safety & Privacy Hub](#), a small amount of paid media and Google search ads during our initial launch, and in-app education. We know that we have much left to do to reach parents, but so far reception from various media outlets and safety organizations has been mixed. Some examples of critical feedback:
 - i. From [TechCrunch](#): "With Snapchat's new Family Center, the company is giving parents some insight into teens' use of the app — but not enough to fully prevent abuse or exploitation, as it favors maintaining the teen's privacy."
 - ii. From the [Organization for Social Media Safety](#): "Generally, Family Center, which focuses on assisting parents to identify Snapchat friends who are not known to the child, provides parents with no way to increase protection against the danger of using Snapchat with known peers."
 - iii. From the [National Center of Sexual Exploitation](#): "While providing tools for caregivers is a critical step in the right direction, these changes and tools do not in and of themselves make children safer. Platforms need to be as safe as possible for all minors, regardless of whether or not they have active and involved parents."
4. **SAB Analysis.** We are kindly asking the Product SAB Team to respond to the following questions:
- a. **Adoption.** How can Snap surge the adoption of Family Center by both parents and teens?
 - i. Parents: What are some recommended ways of educating parents on Snap and those not on Snap about the existence of Family Center? How can we better find and guide parents through the entire process, from downloading the app to supervising their teen's profile, particularly given our challenges with reach?
 - ii. Teens: How can we close the invite-to-accept gap for teens? How can we encourage them to embrace parental supervision without jeopardizing their trust? What reassurances do they need from Snap and how might they best be communicated?
 - b. **Current Feature Set.** Is our feature set rich enough for parents? How can we make Family Center more useful on a more regular basis — while still holding true to Family Center's ideal of balancing parental supervision with teens' privacy? Are there new features that might encourage increased utilization? Are there features that might encourage or dissuade teens from signing up?
 - c. **Perception.** How do you, as an SAB Team, perceive our philosophy of "insight, not control"? How do you think it is perceived by the press, regulators, teens, and parents? Does this stance still make sense, especially given how our product has evolved over time and how our competitors have adapted? How might we leverage Family Center to improve Snap's overall safety perception? How can we better show parents, teens, press, and regulators the efficacy of Family Center and our parental tools?
 - d. **Regulation:** Are there regulations on the horizon that we need to consider when thinking about Family Center's next iteration?



5. **Output.** Kindly requesting that this SAB Team also produce a stack-ranked, prioritized list of Family Center features that Snap should implement, and consider among the SAB Team's own recommendations, the Appendix immediately below.

Appendix: Existing Family Center Roadmap

Category	Feature
Utility	Add Visibility into My AI Interactions in Recent Conversations <i>When teens interact with My AI by chatting with it directly or by @mentioning it in other conversations, My AI will appear under the Recent Conversations section of Family Center [Note: work ongoing; scheduled to be completed by end-May]</i>
Utility	Make Content Controls ON by Default <i>To turn on Content Controls, caregivers must enter Family Center and turn on the controls; this change would default controls to ON for new joiners of Family Center [Note: work ongoing; scheduled to be completed by early-June]</i>
Utility	Show Inbound Message Senders in Recent Conversations <i>Recent Conversations only reflect users whom the teen has SENT a message to; this change would include users who have sent an INBOUND message to the teen as well</i>
Utility	Include Groups in Recent Conversations <i>Recent Conversations only reflect direct, 1:1 conversation partners; this change would add interactions in Group Chats, displaying the members of the Group in which the teen is corresponding with (without revealing the Group Names)</i>
Utility	Show Teen's Subscriptions <i>Adds visibility into a list of Shows, Publishers, and Creators that the teen has subscribed to</i>
Utility	Show (in Family Center) Teen's Location, Stories, "Contact Me" and "Quick Add" Settings <i>Adds visibility into the teen's current privacy settings, which determine who can see their location, who can view their Stories, who can send messages to them, and if they appear in other users' friend add suggestions</i>
Discoverability	Add Additional Entry Points to Family Center from Profile <i>Allows users to access Family Center from their Profile, making it easier to find</i>
Utility	Allow Parents to See and/or Suggest Corrections to Teen's Age <i>Adds visibility into the teen's birthdate/year as set in Snapchat and potentially allows parents to suggest changes to the birthdate/year, which would be updated if confirmed by the teen</i>
Utility	Allow Teens to Opt In to Alert Parents When Teen Makes a Report <i>Adds the option for the teen to alert their caregiver with a push notification when they have submitted a report for a violation of Snap's Community Guidelines</i>
Utility	Send Push Notification to Parent When Teen Adds a New Friend <i>Sends a push notification to the parent when the teen adds a new friend</i>
Utility	Add Location and "Request Live Location" for Parents in Family Center <i>Adds visibility into the teen's location, and allows parents to request live location-sharing directly from Family Center, which gives them visibility as to their teen's current location</i>
Discoverability	Prompts and Tool Tips for Better Discoverability <i>Adds hints, prompts, callouts, animations in various parts of the app that teach users how to navigate</i>



	<i>to Family Center for better discoverability</i>
Utility	Education Carousel in Family Center w/Tips and Guidance for Parents (“Info Hub”) <i>Adds an education hub directly in Family Center, where users can tap to open resources</i>
Utility	Allow Teen to Invite Parents <i>Parents must initiate invites to teens in order to create a Family Center link; this change would create a way for teens to invite their parents to Family Center</i>
Utility	Add Additional Parental Verification <i>Adds an additional layer for teens to verify that their Family Center inviter is their parent by checking for common markers like phone number match or co-location</i>
Discoverability	Add Family Center Option in <18 Onboarding Flow <i>As <18 users are creating a new Snapchat account and onboarding onto the app, we would add prompts in their sign-up flow to join Family Center and invite parents</i>
Utility	Reduce Parent Age to 18+ (from 25+) <i>Parents and caregivers must be at least 25 years old in order to invite their teen to Family Center; this change would allow for any user 18+ to invite others to Family Center (ex: siblings)</i>
Utility	Remove Teen Age Gates (all users are eligible to be supervised in Family Center) <i>Teens must be under 18 years old to join Family Center; this change allows any user to join Family Center regardless of age</i>
Utility	Family Center “Groups” <i>Currently Family Center links exist only between one parent and one teen. While teens can be linked to multiple parents (and parents can be linked to multiple teens), we can consider more of a “Group” structure, where the entity can have multiple members and Family Center can be a place where members can interact. Treating a “family” as more of a traditional “Group” can allow members to name it, add others, create a Group Chat where members can interact with one another, have a place where they can reference saved content, etc.</i>

