

AMENDED Exhibit 911

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



Back to School - Summer Perceptions

Product Research
July-August 2023

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Research Overview

The goal of this research is to understand 13-17 Weekly Snapchat Users perceptions of their usage heading back to school in order to identify any potential opportunities for encouraging more activity during back to school.

Research Objectives

- To quantify Users' perceptions of usage for back to school and to understand their reasons for change in usage

[Research Repository Folder](#)

Methodology

QUANTITATIVE METHOD

- N = 500
- US survey sent through panel
- Access on mobile or desktop
- Blind survey (respondents will not know it is from Snap)
- Late July to Early August 2023 fielding
- Part of the Messaging Benchmark survey that fields N=1500 across age groups

PARTICIPANTS

- Snapchat Users (13-17)
 - Use Snapchat at least weekly
- Mixed devices
- US nationwide
- 40:60 M:F ratio per age group

Executive Summary

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3

- Current Summer Perceived Frequency of Use: Text Messaging is a top competitor for Snapchat weekly Users (self-reported), while BeReal is still not a rising competitor
- Back to School - Perceived Change in Use: Snapchat weekly Users (self-reported) are almost equally split in thinking they will use Snapchat more or about the same when school starts compared to the summer; 22.4% of weekly Users think they will use Snapchat less. These Users also think they will use Text Messaging more once school starts (a top competitor)
 - Reasons for Less Usage of Snapchat:
 - Users want or need to focus on school
 - Users feel like they will have less overall free time
 - Users think they will talk to their friends more in real life
 - Users are restricted or constrained with phone usage at school
 - Users have a declining sentiment or use case for Snapchat
 - Reasons for More Usage of Snapchat:
 - Users will communicate and connect with friends more
 - Users will take more photos/videos with friends
 - Users will meet and make new friends
 - Users will collaborate on schoolwork and create groups for classes, events, and sports
 - Users have a positive sentiment or use case for Snapchat (or to cure boredom in school)

Opportunities:

- School Use Case: lean into school collaboration, with Snapchat for Web and increased communication utility with communities, class group chats, Countdowns, etc.

See more research and opportunities on [School Collaboration](#)

- Snaps & Friends: lean into friends taking Snaps together or of each other with more prompts, group lenses, flashbacks, etc.

Slide 3 Notes

Previous Benchmark Reports: [Q1](#) | [Q2](#) | [Q3](#)

Slide 3 Comments

- 1 The answers seem a bit wishful thinking to me, "I'll be so focused on school, I won't get distracted by socializing with friends." My main takeaway here is we need to focus on making Messaging more useful for the class / study use case. This is a really interesting and useful study, thank you @ [REDACTED]
[REDACTED] 8/4/2023 09:27 AM
- 2 Any sense of why they think this will go up?
[REDACTED] 8/4/2023 11:09 AM
- 3 It's utility focused so probably similar to using Snapchat more - communicating / connecting with friends and school work collaboration
[REDACTED] 8/4/2023 11:09 AM

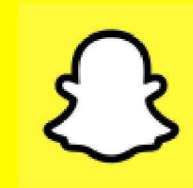
Quantitative Findings

[Current Summer Perceived Frequency of Use of Competitors](#)

[Back to School - Perceived Change in Use](#)

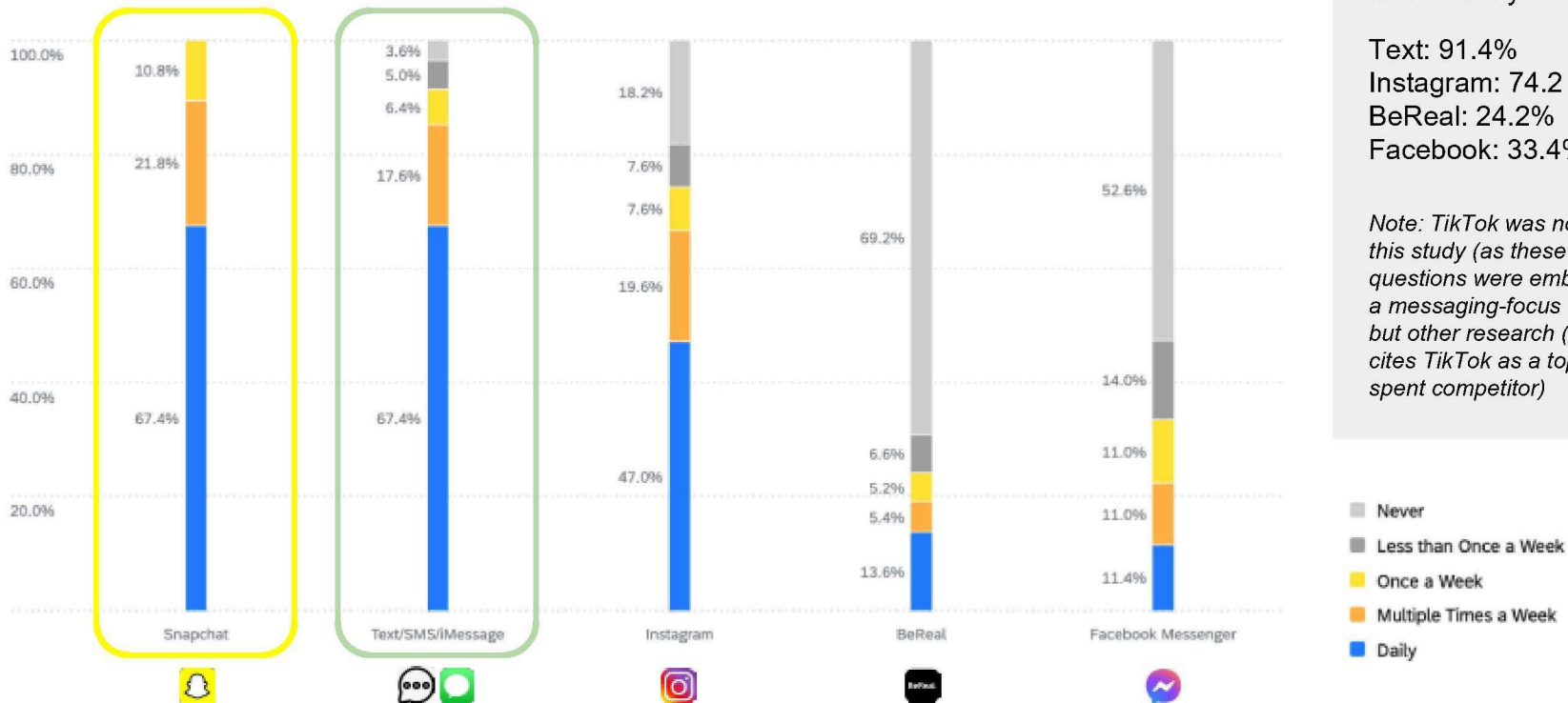
[Reasons for Less Usage of Snapchat](#)

[Reasons for More Usage of Snapchat](#)



Current Summer Perceived Frequency of Use of Competitors

Text Message is the main competitor, then Instagram, for Snapchat weekly Users, while BeReal is not a rising competitor



Snapchat self-reported at least weekly Users use the following at least weekly:

Text: 91.4%
Instagram: 74.2%
BeReal: 24.2%
Facebook: 33.4%

Note: TikTok was not part of this study (as these questions were embedded in a messaging-focus survey, but other research ([1](#), [2](#), [3](#)) cites TikTok as a top time spent competitor)

Never
Less than Once a Week
Once a Week
Multiple Times a Week
Daily

Q: How often do you use the following apps/platforms? [Single Select] N= 500

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SNAP2894002

Slide 5 Comments

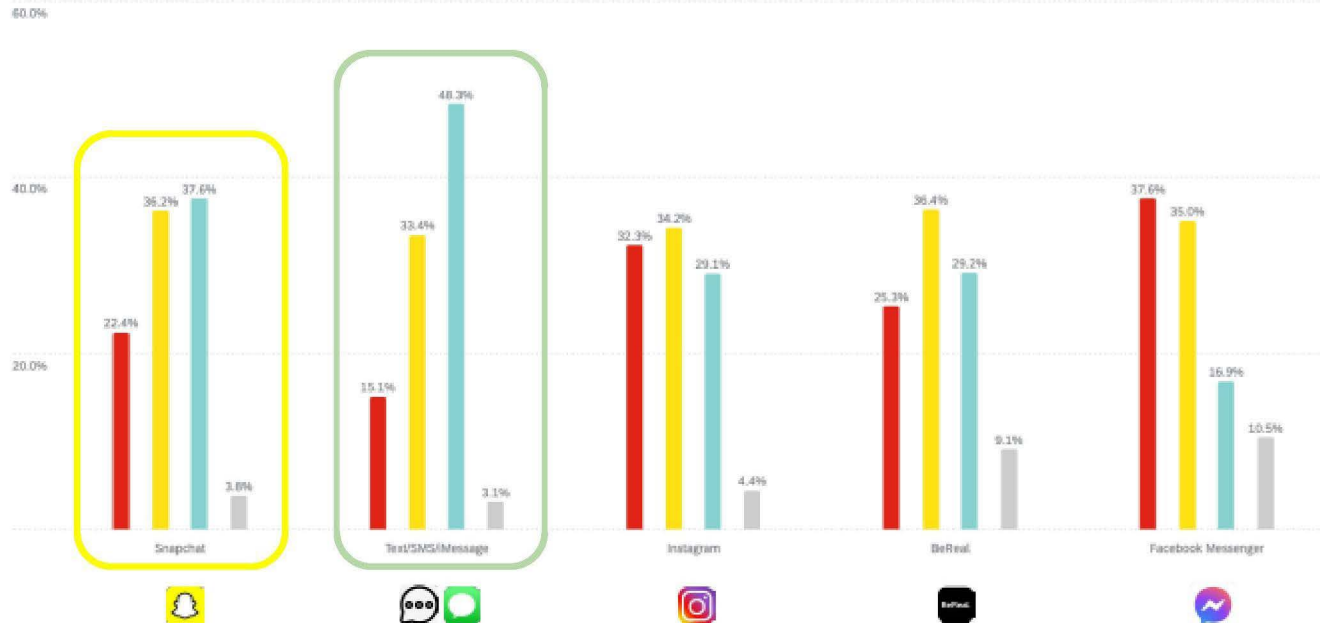
1

@ [REDACTED] [REDACTED] @ [REDACTED] our main competitor in US 13-17 is texting, this means we need to continue to prioritize core messaging functionality if we want to keep this market share & grow.

[REDACTED] 8/4/2023 09:14 AM

Back to School - Perceived Future Change in Use

More Snapchat Users think they will use Snapchat more or about the same when school starts compared to the summer; they also think they will use text messaging more (a top competitor)



Snapchat Weekly Users' Perceived Future Frequency:

- **Less:** 22.4%
 - (51.8% are Daily Users)
- **Same:** 36.2%
 - (64.6% are Daily Users)
- **More:** 37.6%
 - (81.9% are Daily Users)

See reasons why on the next slides

Note: Usage for Snapchat is at least weekly while showing their natural fallout with other platforms - having mixed frequency but not never

- I will use it Less
- About the Same
- I will use it More
- I am not sure/not in school

Q: With the following platforms/apps, how often do you think you will use them once school starts compared to now? [Single Select] | TXT N=482, IG N=409, SC N=500, BR N=154, FB N=237 (Snapchat - at least weekly, All others - not never)

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Top reasons why Snapchat Users think they will use Snapchat less once school starts:

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1. Users want or need to focus on school

"to focus on learning" "so I can focus on my schoolwork" "I have to study" "I need to focus on my education and not my entertainment." "I have to discuss on like homework" "I need to study - I can't have nothing that distracts me from getting good grades" "it is very distracting yet the same as all the other apps. So shame on me but I find Snapchat a bit more entertaining so I use it more. So I'll have to use it less in order to stay focused on my work in school." "I'm going to get busy doing schoolwork and school activities, so I'll rarely check Snapchat." "More time for school and less for socializing"

2. Users feel like they will have less overall free time

"I will barely have time to use it" "Less free time" "Because I won't have as much time to do so" "I'll be too busy to talk to people" "Less screen time" "I will have less time to be on my phone." "I will limit my screen time"

3. Users think they will talk to their friends more in real life

"I'll be in school, and everyone else will be too. So there is no point, just go talk to them irl." "I'll be spending more time off my phone and I'll be around my friends in person instead of online" "I can talk to the people that are in school" "Because I will see my friends instead of texting them"

4. Users are restricted or constrained with phone usage at school

"Because people can't use their phone most of the time" "my wifi won't be as good so i won't be able to send stuff" "No phones on campus" "I am not allowed on my phone during school" "Because I will be in school not on my phone" "Because I won't have my phone"

5. Users have a declining sentiment or use case for Snapchat

"I don't know who still uses Snapchat" "I just dont like snap" "im not really that much of a fan of snapchat"
"I need a break" "Don't really use snapchat that much only for pictures, and I don't like taking pictures at school."

Slide 7 Comments

- 1 Make Snapchat a tool for collaboration on group assignments, homework and school related activities. @ [REDACTED]
[REDACTED] 8/7/2023 11:10 AM
- 2 That's exactly what I'm thinking too, better file sharing support, utilities like Search and infinite retention could be hugely helpful here
[REDACTED] 8/4/2023 12:29 PM
- 3 Yes! Here's past research on school collaboration opportunities:
https://docs.google.com/presentation/d/1RJpQvqGS2ghf4b18GXnr8h_OILV2ZyjcH_vB1HjZtRU/edit#slide=id.g12207735f15_1_4
File sharing was not a huge use case though FYI (it's more cloud storage and links)
[REDACTED] 8/7/2023 11:10 AM

Top reasons why Snapchat Users think they will use Snapchat more once school starts:

1. Users will communicate and connect with friends more

"I think I will use Snapchat more when school starts to feel connected to my friends" "that's usually what i use to text at school when regular texting doesn't work" "Easier to communicate with people" "More people to talk to" "You have a lot of your friends to snap after school days" "my friends might like snap me when I'm in class" "my friends are more active around that time of the year" "Message friends before and after school"

2. Users will take more photos/videos with friends

"So I can take more pictures with friends" "we are definitely gonna be taking group photos or just random photos that will be posted on socials." "i will take more photos with friends" "Idk I just use it to take pictures when I have a good makeup face and good clothes" "I could take some snaps with my friends" "I will be sending and taking pictures of friends and i at school" "I have a lot of friends and who love to take video snaps with me"

3. Users will meet and make new friends

"it's one social media that you can have random people on. Most people my age feel as if numbers are a personal thing so we give someone our Snapchat instead" "More reason to get into contact with people who I likely wouldn't contact for non-educational reasons" "I might meet new friends or new people" "I will probably get more friends and will need their contact other than their numbers" "Nearing new friends & adding them" "People will ask me for my SC"

4. Users will collaborate on schoolwork and create groups for classes, events, and sports

"To study and help friends with homework" "I will need to communicate with friends and classmates on a daily basis." "how i communicate with friends (homework answers, help)" "Because of all the school group chats" "People will text me to see them in the hallways to meet up, help with work, etc" "To keep up with school events" "I can call my friends in study" "classes have their own group chats" "To help organize sports"

5. Users have a positive sentiment or use case for Snapchat (or to cure boredom in school)

"snapchat is my thing" "i love it" "to act cool" "Everyone uses it" "Almost all of the students use it" "Because school is boring" "School is kinda boring and when we aren't doing anything i'll be using snap more" "See what they post on their story" "Because it's a teenager thing"

Slide 8 Comments

- 1 @ [REDACTED] bts friending coming up
[REDACTED] 8/4/2023 09:06 AM
- 2 Class Group chats are a good place to add friends, discuss homework (file sharing?). Need more groups utility projects to support this use case better.
[REDACTED] 8/4/2023 11:08 AM
- 3 YES! I tagged you in a comment on the previous slide on a similar thought.
[REDACTED] 8/4/2023 11:08 AM
- 4 @ [REDACTED] [REDACTED] repost @mention
[REDACTED] 8/4/2023 11:09 AM
- 5 YES! Need to support this feature with more user education.
[REDACTED] 8/4/2023 11:09 AM
- 6 Alongside 3 above, more we can do to promote stories from new friends? @ [REDACTED]
[REDACTED] 8/7/2023 11:11 AM
- 7 I believe we already boost new friends in the carousel ranking. That said, the easiest additional think I can think of is a transactional notification:

"Your new friend, @ [REDACTED], posted to their story. Take a look ☐ ☐ !"
[REDACTED] 8/4/2023 12:49 PM

Slide 8 Comments (Continued)

- 8 *edit: I am doing some digging. Sounds like our ranking feature has only annual granularity... which is kinda rough?
[REDACTED] 8/4/2023 12:54 PM
- 9 Yeah - this needs to be very responsive. We are new friends today / this week. I just noticed on IG that I got a push notification that a new friend liked my story (they normally don't push for story likes), seems like they are also leaning into new friendships
[REDACTED] 8/7/2023 11:11 AM



Please reach out to [REDACTED] with questions