

AMENDED Exhibit 912

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

Users & Friends - Acquire, Retain, Engage and Resurrect - March 30, 2018

Snapchat's Core Product Value ([CPV](#)¹) is enabling the fastest way to capture and share, fun every day moments. This plan outlines our strategy to grow our Daily Active Users (DAU) through **Acquiring and Retaining** new users, **Engaging** our existing users and **Resurrecting** churned users.

From the AB tests we have shipped in 2017, data science modeling and user feedback, we believe there remains significant opportunity for Snapchat to (1) attract new users to our product, (2) get new users to understand our CPV, (3) improve the engagement of our lightly active users, and (4) resurrect and retain our large churned user base. Our approach, is to align each of these opportunity areas with the user journey, and quickly test and launch features that have significant impact on our top line metrics.

1. Tenets

We will use these tenets as our guide to evaluate new growth opportunities:

- We strive to deliver our CPV to users early and often.
- The most important thing for a new user to understand our CPV is to receive Snaps from their friends.
- We respect customers' privacy. Users should never be surprised by who their content or information is shared with.
- Focus on impact. We're not doing anything if we're not moving our top line metrics².
- Our intuition is not always right, so we test everything.
- No user is the average user. Different things work for different [user types](#)³.

2. Acquire New Users

Acquiring new customers is key to our growth strategy. In our core markets in North America and Western Europe, we will acquire new customers with a focus on aging up. In new and emerging markets such as China, India, Japan and Brazil, we will acquire new customers across all age groups.

2.1 Drive Organic Acquisition

Organic user acquisition is a powerful tool to grow our daily active users for low cost. We will leverage the discovery experience built for Stories Everywhere to attract SEO traffic with calls to action to download and install the Snapchat app. Story and Map embeds across the internet will become ingress points to encourage users to download and install Snapchat on their device and then prompt for account registration. Snap Anyone functionality will also reside within this web experience such that SMS messages having a link to a Snap will be a short URL pointing to this web experience.

2.2 Explore Paid Acquisition Channels

We will validate whether paid acquisition is an effective channel for acquiring new Snapchat users by building the infrastructure that allows us to effectively track and attribute installs and experiment with various campaigns. If we find efficient channels, such as paid search, we will build models to perform bid optimization to maximize long term ROI.

3. Improve New User Retention

Once we have acquired a new user, we need to activate the user so that they can quickly experience our CPV. This will be measured by improving new user retention, defined as the percentage of new users that are active 3+ days in their second week ([%L3+ in Week 2](#)). Through [data science modeling and AB testing](#), we know that getting new users friends, encouraging subsequent communication as well as streamlining registration, are highly retentive levers. Today, only 20%

¹ https://docs.google.com/document/d/1obAp03Me1lhvHfDkfmnwX_n-5FrM2UhJonJUP4wIZfA/edit

²Top level metrics are 1. Acquisition - # installs, 2. Activations - %L3+ from Install, and 3. Engagement - DAU and Time Spent.

³ https://docs.google.com/document/d/1g9m5UqBxKRj92jDklu0BQr0GEJpJ_mjdse_t0cA3CTY/edit?ts=599de464#heading=h.j29t9e49rywv

of new users are active 3+ days in their second week. Improving our retention will also have the halo effect of improving the effectiveness of our acquisition efforts.

3.1 Increase New User Friending

In 2017 we increased the number of users with 3 or more friends at the end of their first week by 20%. With each test that improved new user friending, we saw an increase in new user retention. We will continue to drive new user friending by increasing the number and quality of recommendations we present and by increasing the visibility of friend suggestions in the app. We will put extra emphasis on driving friending for the highest risk new users, which are the users with very few friends, since those have a disproportionately high chance of churning.

3.2 Encourage new users to view Snaps

After a new user makes friends, we want them to view Snaps from their friends to understand the CPV of Snapchat. In order to do this we will (1) encourage engaged existing users to send Snaps to their newly made friends through optimizing Send To and (2) ensure new users don't miss any new Snaps from their friends using guided navigation prompts and push notifications.

3.3 Encourage new users to send Snaps

Snaps are our biggest differentiator as a product, and it is the key to our CPV. Sending a Snap to a friend is the start of a virtuous cycle of communication. Today, only 15% of new users send a Snap by their first day. We aim to encourage new users to send Snaps by (1) inspiring them with potential content they can send with onboarding videos, (2) allowing new users to send Snaps to their Contacts (who may not necessarily be their friends), and (3) improvements to the Send To flow.

3.4 Streamline Registration Process

Creating a Snapchat account should be easy. Today, only 65% of new installs successfully create an account. We aim to improve this with a registration redesign that improves the overall UX as well as strong prompts to encourage friending. We will also create pre-registration experiences centered on the Camera, that will delight our new users and incentivize them to sign up for Snapchat.

4. Drive Engagement of Lightly Active Users

Currently, we have ~330M MAU and ~260M WAU on Snapchat today with 51% of WAU as L7 users. The remaining 49% of users represent a significant opportunity for us to continue exposing CPV to our less engaged users. For example, by converting all of our current L1 and L2 weekly active users to L3, we can add ~13M incremental DAU.

4.1 Improve Existing User Friending

We aim to deepen engagement among existing, lightly active users by ensuring that users have friends to communicate with on Snapchat and encouraging users to create strong, healthy friendships on Snapchat. This requires actively increasing friend suggestion inventory, ranking suggestions to encourage friending for lightly active users, and creating better post-friend communication experiences.

4.2 Prompt users to return to the app by surfacing content they may miss

Given the ephemeral nature of content on Snapchat, users are at constant risk of missing moments they would have otherwise enjoyed. By crafting notification campaigns and features that are highly relevant and personalized to the user, we can promote and encourage meaningful engagement on Snapchat while adhering to our "Responsible Re-engagement" principles, i.e. ensuring that we are not annoying our users by applying thoughtful rate limits, cool down periods, scheduling guidelines, etc.

4.3 Encourage highly active users to send Snaps and post Stories for less engaged users

Sending and Receiving Snaps serve as two of the most retentive actions that users can engage in. This means improving the Sending experience through the Send To page so users can quickly and easily find recipients while also encouraging them to share content with less active users by suggesting potential recipients.

5. Resurrect and Retain Churned Users

Currently more than 1.7M users resurrect on a daily basis from 14+ days of inactivity, yet they retain at only around 17% (%L3+ in Week 2). Additionally, there are over [800M+ accounts](#) in a churned state on Snapchat. This represents a significant opportunity, if we can bring more churned users back to Snapchat, and find hooks (such as friending) to keep them once they resurrect.

5.1 Resurrect churned users through push notifications

We aim to responsibly re-engage churned users through highly contextual and relevant push notifications centered around potential friend suggestions, available friend stories and new Snapchat updates (new features, lenses, creative tools).

5.2 Resurrect churned users through email

Snapchat currently does not use emails to communicate with churned users. We will begin experimenting in this area as part of our responsible re-engagement strategy, by sending highly contextual emails to churned users centered around pending friend adds, popular story content and new, exciting creative tools and lenses.

5.3 Retain resurrected users once they come back into the app

Through data science work we know that making new friends, and viewing/sending a Snap correlate highly with a resurrected user retaining on Snapchat. Given this, we plan to ensure that resurrected users do not miss any pending friend requests/suggestions as well as any unread Snaps. We will encourage resurrected users to phone verify and contact sync, which will help them find new friends after resurrecting.

6. Customer and Engineering Excellence

While our main focus is on growing DAU, we want to do this in a way that demonstrates and models customer and engineering excellence and addresses some of the long-standing issues in the space.

6.1 Address top customer complaints

Best friends generates thousands of customer complaints per week which can adversely affect our users perception of our brand. We will reduce complaints by 50% by making it harder to fall out of the best friends list if there are slots still available, decaying historical interaction data more predictably and giving more weight to friends that chat.

As we increase our use of push notifications to drive engagement, we want a counter balance goal of reducing all user complaints for non-messaging notifications by 35% to de-risk users turning off notifications completely.

6.2 Deliver Features that Meet a High Quality Bar at a Lower Cost

We will improve the quality of our released code by achieving 80% automation test coverage for new features. We will partner with the new Atlas team in Platform to improve the cost efficiency of our core User and Friending services, shifting \$5M of GCP cost to AWS.

6.3 Improve Developer Happiness

When developers are unhappy they are less productive and can attrit. We will learn from the company-wide developer survey and improve our score by 10% YoY by addressing survey issues.

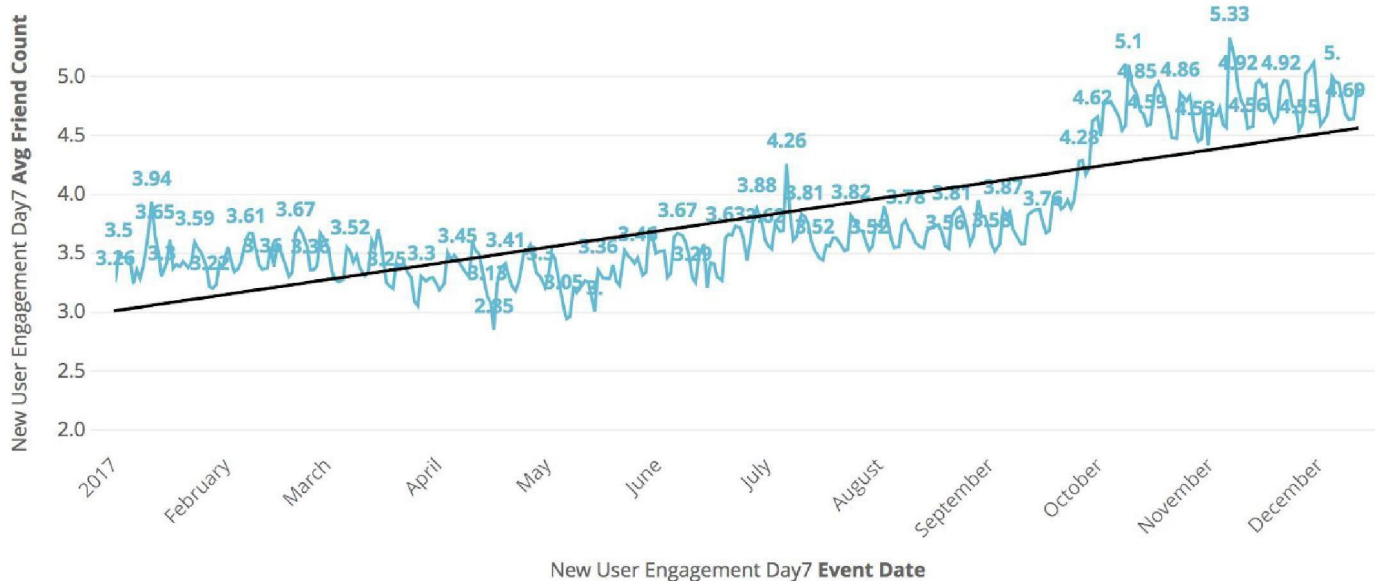
Appendix "A" - 2017 Accomplishments for the Growth Team

You can find the full roadmap of growth work for [New User](#) and [Core Growth](#) at the given links. Below are some highlights of the top outcomes.

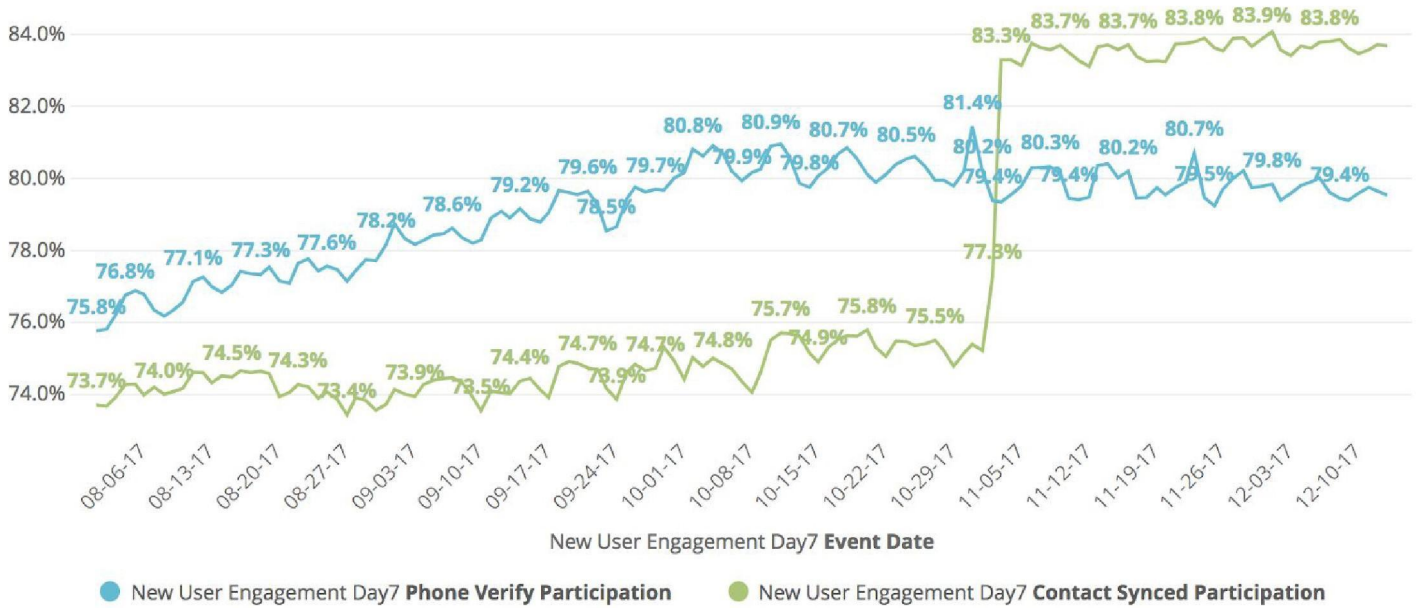
New user retention, measured by the percent of users that are active three or more days in their second week (from account create), increased from around 31% to 34%, an increase of 10%.



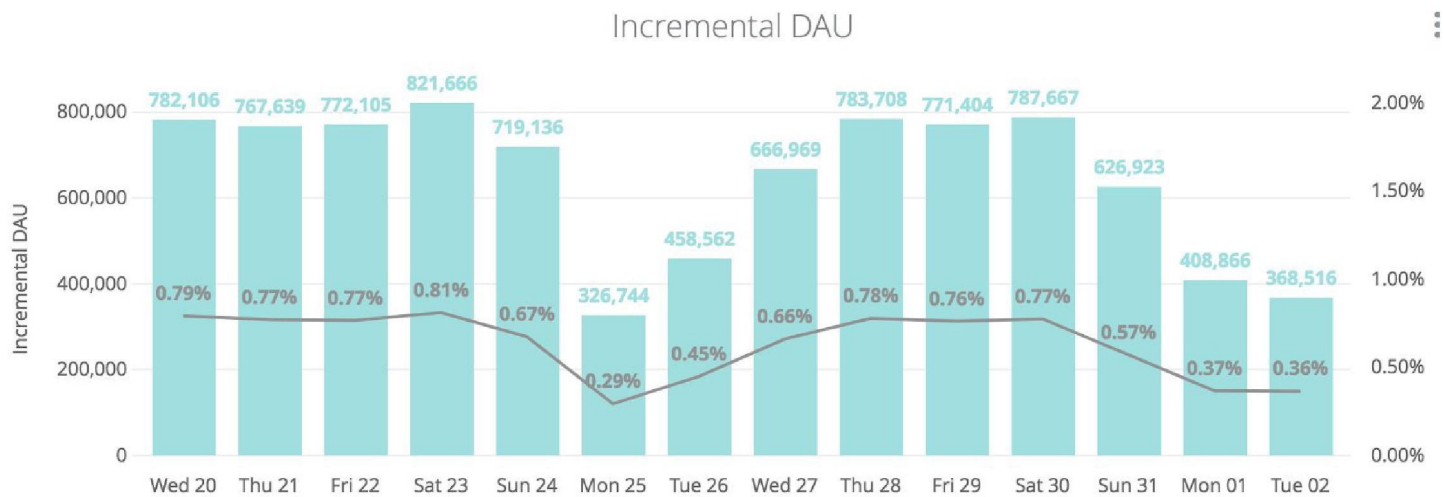
The average number of friends for new users after their first week increased from around 3.5 to 4.75, an increase of 36%.

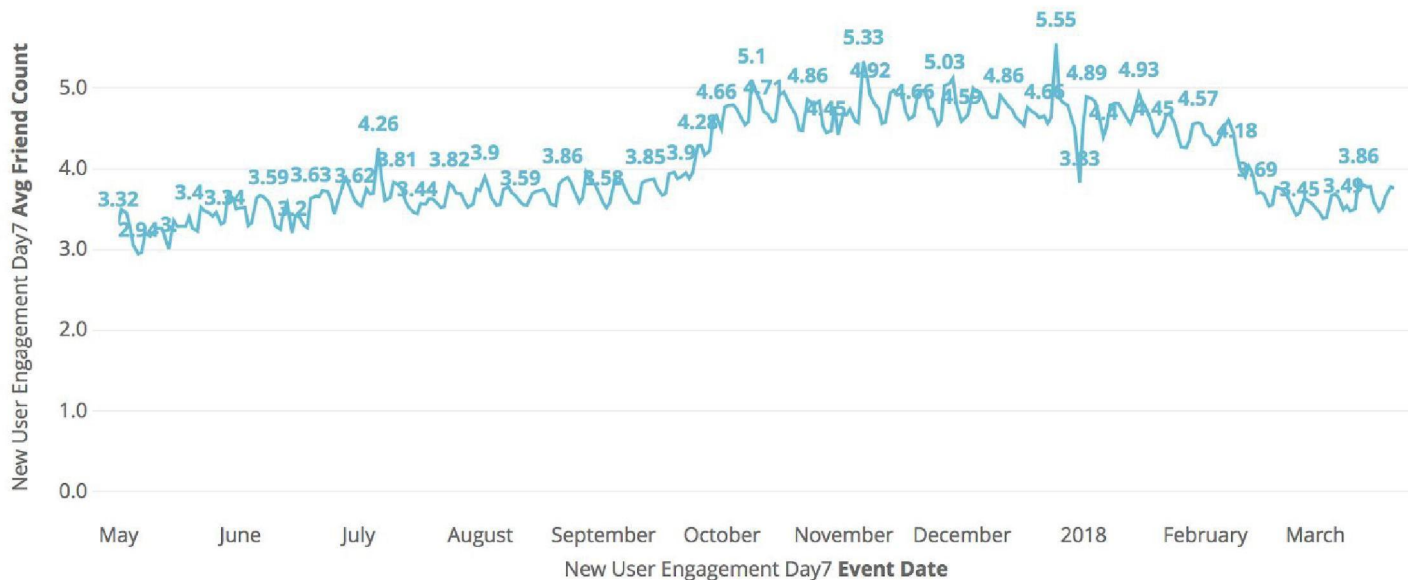


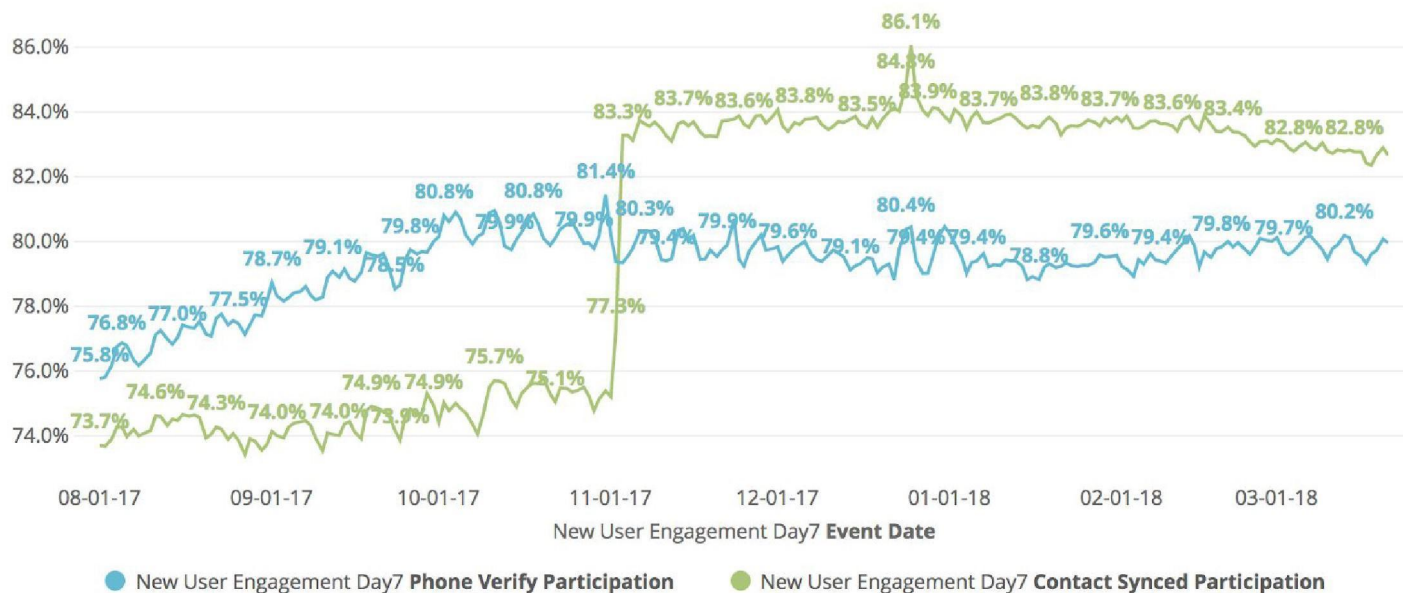
The percent of users that verified their phone number in their first week on the platform increased from around 76% to 79%, an increase of around 4%. The percent of users that synced their contact book increased from around 74% to 83.5%, an increase of 16%.



Our Story Push Notification campaign work is driving a consistent 750K DAU each day (holidays deflate this number as we send a mass Snap).



Appendix "B" - Updated charts from Appendix A through 2018New user retention (%L3+ in Week 2 from account creation)Decline in new user retention from early Feb is due to Cheetah rollout ([new user AB test results here](#))New user friending (avg. friend count for new users by Day 7)Decline in new user friending from early Feb is due to Cheetah rollout ([new user AB test results here](#))

Contact sync and phone verification rate (last 9 months of available data)Incremental DAU from push notifications

Incremental DAU from Growth Campaigns

