

AMENDED Exhibit 916

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

4/12/2023, 9:58 PM UTC

Labels

type: document

Quip

[FHP] Verified Community acquisition & activation [V1]

Feature Overview

This spec outlines several FHP campaigns for HS community acquisition & activation. Campaigns defined here should be apply to both high school and college community users.

- Acquisition: acquire non-users to become a community member.
- Activation: encourage existing members to engage with community features, especially to post to Story.

Feature Goals

- Remind users to check back in and post Stories to the community

User Stories

1. Activation

Trigger Rules

- The community has more than 50 members
- At 4 pm local time to all current community members

Copy 1

- Title: Don't miss out!
- Subtext: [Community name] is taking off. Meet new friends and see what everyone is talking about!
- Emoji: 🚀

Copy 2

- Title: Need help on that assignment?
- Subtext: Post to [community name] Story and find a study buddy!
- Emoji: 📖

- Tapping the FHP will take me to the Community Profile page of my community

Cool down

- This FHP should show every 7 days for 3 campaigns, and then every 30 days going forward
- 10 impression per campaign
- No max campaign cap as long as user is qualified

2. Acquisition

Trigger Rules

- non-member
- 13-24 inferred age

Copy 1

- Title: Don't miss out!
- Subtext: Your school's shared Story is taking off. Meet new friends and see what everyone is talking about!
- Emoji: 🚀

Copy 2

- Title: Need help on that assignment?
- Subtext: Join your school's shared Story and find a study buddy!
- Emoji: 📖

Copy 3

- Title: Need to campus?
- Subtext: Meet new friends and see what everyone is talking about!
- Emoji: 👁️

Action

- Tapping the FHP will open the onboarding tray

- This FHP should shown everyday, no cap
- 10 impression per campaign
- No max campaign cap as long as user is qualified

Testing

Test population:

Sheet2

	Cohort	UX	Allocation
1	Control		5%
2	Treatment 1		5%
3	Treatment 2		5%
4	Treatment 3		

AB test study name: XXXX

AB test variable: XXXX

Processing user information to deliver and operate services

The team wants to add new campaigns for HS community acquisition & activation. This is an in-app experience not a notification. The targeting criteria are innocuous and do not create any new information channels.

SOX

Below this line is intended for projects that require SOX. If your project doesn't require SOX...feel free to ignore from here down.

SOX Testing

[Template for UAT tracking](#). This template is for your convenience. If you can think of a better one for your project feel free to create and use it.

<insert guide and examples for what level of testing would be required for SOX testing>

SOX Financial Approvals

All project financial approvals should be retained and kept here for documentation purposes. This includes above testing approvals and Final Go-Live approval by appropriate Business and Engineering leadership.

Sheet3

	Review Type	Reviewer	Date	Status	Notes
1	UAT - Complete (validating UAT happened...details in section above)				<insert link to test results, or link is in section above>
2	SOX - Engineering - Material Launch				
3	SOX - Finance - Material Launch				
4					
5					

Patent Review

Redacted--AC

If so, please fill out our [Patent Disclosure Form](#) or contact [REDACTED] on the IP team. You can find more information about the Snap's Patent Program [here](#).

Zero Rating Partnership Review

Zero Rating is a special kind of partnership that mobile app companies like Snapchat negotiate with Mobile Data Service Providers (like Sprint, Verizon, T-mobile, Vodafone, Orange, etc.) Zero Rating makes our application “free” for users by omitting Snapchat data traffic from the mobile subscribers data plan. Users can enjoy Snapchat without using up their data quota. Learn more about Zero Rating [here](#). We need your cooperation to make sure we don't introduce new domains with which Snapchat opens connections without notifying our mobile

Review Questions (eng)

These questions must be filled out by an **engineer or engineering director two weeks before code freeze** for the target release.

- Will your feature create any new domains to which the Snapchat mobile application opens network connections? For example, when Snapchat introduced integrations with the Giphy, our client code began opening connections with [media.giphy.com](#). **Not sure if your domain is new?** See our current whitelist [here](#).
 -
- If yes to number 1, what is the new domain, and what is the purpose of the new connection?
 -

Once this section is completed and the spec is ready for review....

- Email: [i \[REDACTED\]](#) with a link to your PDR.
Subject: Zero Rating Partnership Review; Body: (Target Release and Link to Quip and Jira Ticket).
- Fill in review request details below:

Sheet4

	Review Requester	Date	Notes
1			

Review Results (Infrastructure)

Only **Snapchat Infrastructure** should fill in this section. If Approved, any future changes will require a new review.

Sheet5

	Review Type	Reviewer	Date	Status	Notes
1	Network Infrastructure				
2					

Metadata of [FHP] Verified Community acquisition & activation [V1]

Thread class

document

Created

2023-04-12T21:58:33+00:00

Updated

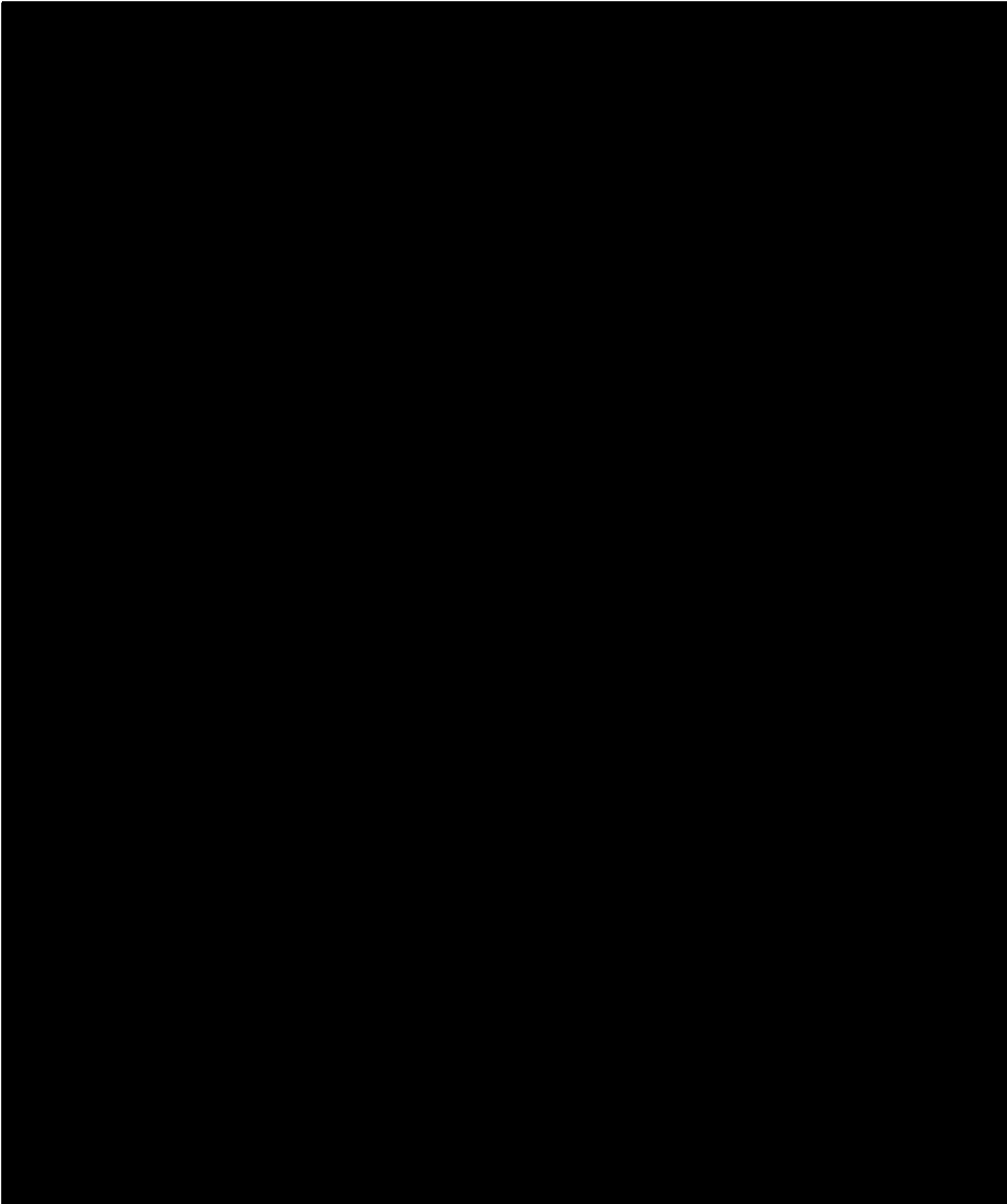
Link

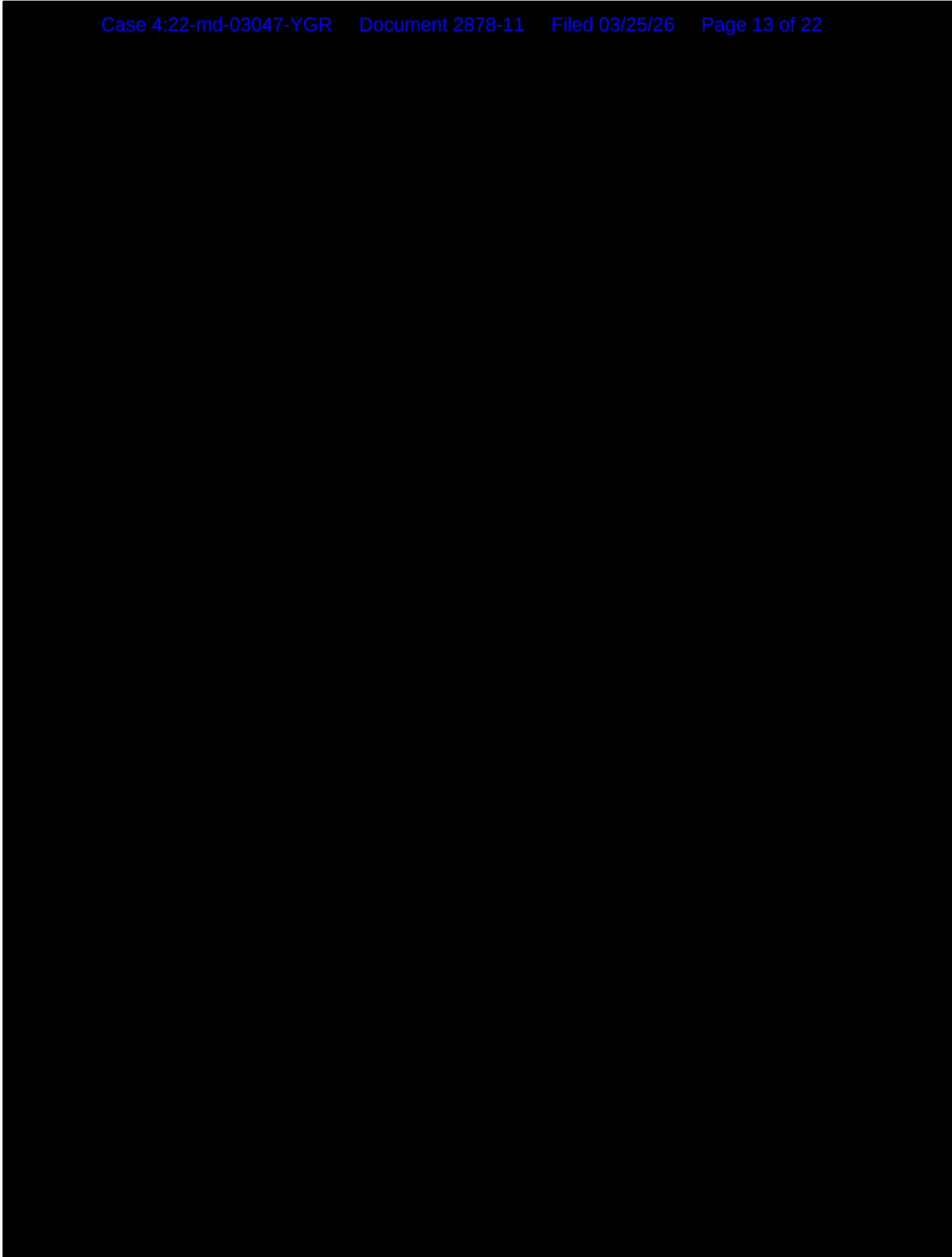
<https://snapchat.quip.com/rrbwAJBK11pF>

Shared folders

Activation, Profile

Expanded users





Users

Urls

- <https://v1-dot-sc-questionnaire.gae.sc-corp.net/questionnaires/legitimate-interest-assessment/answerSets/37a8aab8-f15f-4036-b706-8166ca8d9e4c>
- https://docs.google.com/a/snapchat.com/spreadsheets/d/1c6JZY-px_vXMAINzd3l2NtAa30Tqpl0qXEKl-f9hztK/edit?usp=sharing
- [https://sites.google.com/ \[REDACTED\]](https://sites.google.com/ [REDACTED])
- <https://docs.google.com/document/d/14m6vYqZcUlbjs1wMhVFf1sxK5QcmsY-CFsG-T0BK9iM/edit>
- [https://wiki.sc-corp.net/ \[REDACTED\]](https://wiki.sc-corp.net/ [REDACTED])
- <http://media.giphy.com>
- <https://docs.google.com/spreadsheets/d/1yuHmGel331pZ0wCAX2VztUXVmPLQzHCSJwLfOp0jRPY/edit#gid=0>
- [mailto: \[REDACTED\]](mailto: [REDACTED])

Chat

This one is interesting, AFAIK there isn't a way to trigger at a specific time
4/12/2023, 10:33 PM UTC

whats the logic on the cooldown? Is this every 14 days show one of three "copies" or the user will see three copies/campaigns for communities

4/12/2023, 10:39 PM UTC

Don't like this title. 'Waiting' is confusing to me here

4/12/2023, 10:47 PM UTC

each time it is shown it is a campaign cycle (show campaign for 10 impressions). so the first 3 campaign cycles we do it every 14 days, and then slows down from there

4/12/2023, 11:29 PM UTC

ahh misunderstood thanks for clarity

4/12/2023, 11:36 PM UTC

Agreed that the title could be more straight forward. The "Join Your Classmates" title in the screenshot is a bit better IMO.

4/18/2023, 8:59 PM UTC

PASS Updated

4/19/2023, 9:04 PM UTC

PASS Updated

4/19/2023, 9:04 PM UTC

PASS Updated

4/19/2023, 9:04 PM UTC

PASS Updated

4/19/2023, 9:04 PM UTC

PASS Updated

4/19/2023, 9:05 PM UTC

PASS Updated

4/19/2023, 9:05 PM UTC

PASS Updated

4/19/2023, 9:05 PM UTC

PASS Updated

4/19/2023, 9:05 PM UTC

PASS Updated

4/19/2023, 9:06 PM UTC

PASS Updated

4/19/2023, 9:06 PM UTC

<https://quip.com/PDRAEA9koPnI> would use this as the headline "Your Schools Shared Story is Taking Off" and can keep the sub text the same. Do you want to mention "communities" by name?

4/19/2023, 11:10 PM UTC

Is the logic 10 impressions once every 14d or 1 impression per day with a 14d cooldown?

4/19/2023, 11:11 PM UTC

I'd set this higher and add a click / dismiss cap. For Plus we did no impression cap, 3 taps (24 hr cooldown inbetween each tap) and 2 dismiss (24hr cooldown inbetween each dismiss).

4/19/2023, 11:13 PM UTC

Ideally you can run this aggressively for a couple weeks and then dial it back once you start to see impact diminish

- [REDACTED] [REDACTED]

10 impression once every 14d

4/20/2023, 12:06 AM UTC

we will cap this later

4/20/2023, 12:07 AM UTC

don't have the capability to show dynamic community names. yeah we can test different copy, will test this one in the next round

4/20/2023, 12:08 AM UTC

- [REDACTED] [REDACTED]

PASS Updated

4/24/2023, 10:59 PM UTC

PASS Updated

4/24/2023, 10:59 PM UTC

PASS Updated

4/25/2023, 2:57 AM UTC

PASS Updated

4/25/2023, 2:57 AM UTC

PASS Updated

4/25/2023, 2:57 AM UTC

PASS Updated

4/25/2023, 2:58 AM UTC

PASS Updated

4/25/2023, 2:58 AM UTC

Review marked Complete

4/25/2023, 2:58 AM UTC

- [REDACTED] [REDACTED] [REDACTED]

PASS Updated

4/27/2023, 12:01 AM UTC

Edits

[REDACTED] [REDACTED] edited at 2023-04-26T04:08:48.610Z

- **Copy 3**
- Title: Need to campus?
- Subtext: Meet new friends and see what everyone is talking about!
- Emoji: 🗨️
-

[REDACTED] [REDACTED] edited at 2023-04-25T02:57:19.176Z

- Add The team wants to add new campaigns for the chat feed banner HS community acquisition & activation.

This is an in-app experience not a notification. the The targeting criteria are innocuous and do not create any new information channels.

[REDACTED] [REDACTED] edited at 2023-04-24T22:59:13.711Z

- Add new campaigns for the chat feed banner.

This is an in-app experience not a notification. the targeting criteria are innocuous and do not create any new information channels.

TODO: list data accessed here.

edited at 2023-04-20T20:19:35.658Z

.

edited at 2023-04-20T00:07:10.348Z

- This FHP should show every 14 7 days for 3 campaigns, and then every 45 30 days going forward
- 10 impression per campaign
- No max campaign cap as long as user is qualified

edited at 2023-04-19T23:05:50.348Z

edited at 2023-04-19T01:54:42.765Z

- [FHP] Verified Community re-engagement acquisition & activation [V1]
- ~~Community users are reluctant or not interested in posting content when the group is small. Today, we don't inform users when a community grows in size. Users are not aware of the growing / active community unless Stories are being posted, but users are less likely to post to the Story when there is few audience.~~
- —
- This spec outlines several FHP will pop up when a campaigns for HS community reaches a certain size, acquisition & activation. Campaigns defined here should be apply to both high school and encourage college community users to return to the community Profile page to meet new friends and post to the Story. This FHP will be shown to all users in the same community at the same time to generate excitement. The goals are to re-engage members and encourage Story posting.
- Acquisition: acquire non-users to become a community member.
- Activation: encourage existing members to engage with community features, especially to post to Story.
- —
- 1. Activation
- The user has not viewed any community Story in the past 7 days
- At 4 pm local time to all current community members
- **Copy 1**
 - Title: Your classmates are waiting Don't miss out!
 - Subtext: See who has join [school short name + year] [Community name] is taking off. Meet new friends and start share Stories see what everyone is talking about!
 - Emoji: 🕶️ 🚀
- .
- **Copy 2**
 - Title: Need help on that assignment?
 - Subtext: Post to [community name] Story and find a study buddy!
 - Emoji: 📖 📚
- .
- —

- No max campaign cap as long as user is qualified
- 2. Acquisition
- **Trigger Rules**
- non-member
- 13-24 inferred age
-
- **Copy 1**
- Title: Don't miss out!
- Subtext: Your school's shared Story is taking off. Meet new friends and see what everyone is talking about!
- Emoji: 🚀
-
- **Copy 2**
- Title: Need help on that assignment?
- Subtext: Join your school's shared Story and find a study buddy!
- Emoji: 📖
-
- **Action**
- Tapping the FHP will open the onboarding tray
-
- **Cool down**
- This FHP should shown everyday, no cap
- 10 impression per campaign
- No max campaign cap as long as user is qualified

edited at 2023-04-18T23:32:37.327Z

edited at 2023-04-13T20:46:43.654Z

edited at 2023-04-12T23:10:34.312Z

- Spreadsheet updates

edited at 2023-04-12T23:08:54.518Z

- Spreadsheet updates

edited at 2023-04-12T23:00:12.646Z

- Spreadsheet updates

- Spreadsheet updates

edited at 2023-04-12T22:53:18.353Z

- Spreadsheet updates

edited at 2023-04-12T22:45:18.717Z

- Spreadsheet updates

edited at 2023-04-12T22:45:13.304Z

- Spreadsheet updates

edited at 2023-04-12T22:41:17.702Z

- Spreadsheet updates

edited at 2023-04-12T22:37:57.345Z

- Spreadsheet updates

edited at 2023-04-12T22:33:05.917Z

edited at 2023-04-12T22:32:25.510Z

- Spreadsheet updates

-
-
-

edited at 2023-04-12T21:58:43.172Z

- Sheet2 updated
- Sheet3 updated
- Sheet4 updated
- Sheet5 updated

- [FHP] Verified Community re-engagement [V1]
- Feature Overview

Community users are reluctant or not interested in posting content when the group is small. Today, we don't inform users when a community grows in size. Users are not aware of the growing / active community unless Stories are being posted, but users are less likely to post to the Story when there is few audience.

-

• This FHP will pop up when a community reaches a certain size, and encourage users to return to the community Profile page to meet new friends and post to the Story. This FHP will be shown to all users in the same community at the same time to generate excitement. The goals are to re-engage members and encourage Story posting.

-
- Feature Goals
- Remind users to check back in and post Stories to the community
-

- User Stories
-
-

- **Trigger Rules**

- The community has more than 50 members
- At 4 pm local time to all current community members
-

- **Copy**

- Title: Your classmates are waiting!
- Subtext: See who has join [school short name + year] and start share Stories!
- Emoji: 🤔
-

- **Action**

- Tapping the FHP will take me to the Community Profile page of my community
-

- **Cool down**

- This FHP should show every 14 days for 3 campaigns, and then every 45 days going forward
- 10 impression per campaign
- No max campaign cap
-
-
-

- Testing

- **Test population:**

- **AB test study name:** XXXX
- **AB test variable:** XXXX
-
-
-

- pass

- SOX

• Below this line is intended for projects that require SOX. If your project doesn't require SOX...feel free to ignore from here down.

- **SOX Testing**

• *All changes should be appropriately tested with testing evidence provided here. This includes Engineering testing, User Acceptance Testing, and any required data validation testing. Link all testing evidence below (i.e., Quips, Tickets, Google Sheets, etc.)*

- Template for UAT tracking. This template is for your convenience. If you can think of a better one for your project feel free to create and use it.
-

• <insert guide and examples for what level of testing would be required for SOX testing>

- **SOX Financial Approvals**

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- All project financial approvals should be retained and kept here for documentation purposes. This includes above testing approvals and Final Go-Live approval by appropriate Business and Engineering leadership.

- **Patent Review**

- Redacted--AC

 If so, please fill out our Patent Disclosure Form or contact

[REDACTED]

 on the IP team. You can find more information about the Snap's Patent Program [here](#).

-
- Zero Rating Partnership Review
- Zero Rating is a special kind of partnership that mobile app companies like Snapchat negotiate with Mobile Data Service Providers (like Sprint, Verizon, T-mobile, Vodafone, Orange, etc.) Zero Rating makes our application "free" for users by omitting Snapchat data traffic from the mobile subscribers data plan. Users can enjoy Snapchat without using up their data quota. [Learn more about Zero Rating here.](#) We need your cooperation to make sure we don't introduce new domains with which Snapchat opens connections without notifying our mobile data service partners.

- Review Questions (eng)
- *These questions must be filled out by an **engineer or engineering director two weeks before code freeze** for the target release.*
-
- Will your feature create any new domains to which the Snapchat mobile application opens network connections? For example, when Snapchat introduced integrations with the Giphy, our client code began opening connections with media.giphy.com. **Not sure if your domain is new?** See our current whitelist [here](#).
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- If yes to number 1, what is the new domain, and what is the purpose of the new connection?
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- *Once this section is completed and the spec is ready for review....*
- Email:

[REDACTED]

 with a link to your PDR.

Subject: Zero Rating Partnership Review; Body: (Target Release and Link to Quip and Jira Ticket).

- Fill in review request details below:

- Review Results (Infrastructure)
- *Only **Snapchat Infrastructure** should fill in this section. If Approved, any future changes will require a new review.*
-