

AMENDED Exhibit 92

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

Message

From: Kristen L Hannum [REDACTED]
Sent: 9/23/2019 3:52:52 PM
To: Nathalie Sun [REDACTED]; [REDACTED]
CC: [REDACTED]; Grace Yao [REDACTED]; Janel Koval [REDACTED]; Katie Czyz [REDACTED]
Subject: Re: Project Mercury: Links Provided Follow Up for Confirmation
Attachments: Project Mercury_Live Test Links for Client Use V7.xlsx

Thank you for confirming, Nathalie!

[REDACTED]

We have updated the survey per your request. Please also see our responses to issues described [here](#). We have provided new test links (see attached) for your review. Please let us know if anything additional. Thank you!

All the best,
 Kristen

On Mon, Sep 23, 2019 at 10:35 AM Nathalie Sun <[REDACTED]> wrote:
 Confirming it's fine to change the language to reflect just baseline+endline incentives — thanks, Kristen!

On Mon, Sep 23, 2019 at 5:51 AM Kristen L Hannum <[REDACTED]> wrote:
 Thanks for pointing this out, [REDACTED]. You are correct that the totals reflect the point values for completing all three surveys. We are updating the language per your request. Let me also reach out to Nathalie/Janel to confirm we are OK to change this language as you have mentioned.

I am checking with programming team regarding the other format differences and link troubleshooting. I will provide an update later today.

Best,
 Kristen

On Fri, Sep 20, 2019 at 7:47 PM [REDACTED] wrote:

Hi Kristen,

Thanks again for the survey links. Overall, the survey looks good. You can find our feedback [here](#). The only thing that is a launch-blocker that we want to flag is the incentives language in the deactivation question:

- In a previous email Nathalie confirmed that people will receive \$7.50 and \$10 in points for answering the baseline and endline surveys in the Prodege and Embee panels, respectively. Yet the deactivation question quotes \$8.50 (for Prodege) and \$11 (for Embee) in points for the amounts people would be compensated with for answering the endline and baseline surveys. Can you please explain to us why this is the case? It seems that the amounts quoted are including the compensation from the screener? If so, this does not seem accurate.

The rest of the feedback in the document is relatively minor, and does not prevent us from launching the screener.

Thanks,

[REDACTED]

From: Kristen L Hannum <[REDACTED]>
Date: Friday, September 20, 2019 at 2:13 PM
To: [REDACTED]
Cc: [REDACTED], Janel Koval <[REDACTED]>, Grace Yao <[REDACTED]>, Nathalie Sun <[REDACTED]>
Subject: Re: Project Mercury: Links Provided Follow Up for Confirmation

Of course! Thanks, [REDACTED]

On Fri, Sep 20, 2019 at 5:11 PM [REDACTED] <[REDACTED]> wrote:

Thanks, Kristen. Removing the case-sensitive constraint sounds good. We will start the review of the links, and will let you know if anything comes up.

Thanks again for helping us get the survey ready.

Best,

[REDACTED]

From: Kristen L Hannum <[REDACTED]>
Date: Friday, September 20, 2019 at 1:29 PM
To: [REDACTED]
Cc: [REDACTED], Janel Koval <[REDACTED]>, Grace Yao <[REDACTED]>, Nathalie Sun <[REDACTED]>
Subject: Re: Project Mercury: Links Provided Follow Up for Confirmation

Hi [REDACTED]

Thank you for your follow up. I refer to the case-sensitivity of "facebook.com" in the requirement when entering URL. Previously, entering "Facebook.com" or "FACEBOOK.COM" would not be accepted. To prevent confusion of respondents receiving an error when they have typed a valid address, we have removed case-sensitivity for the requirement at this question. It will not affect the verification of the URL behind the scenes. Please let me know if you have any objection.

There are no revisions pending, as all requested were completed prior to the delivery of links to your team earlier today. If any additional questions, please let me know.

Thank you!

Kristen

On Fri, Sep 20, 2019 at 4:21 PM [REDACTED] > wrote:

Hi Kristen,

Thank you for the update and the updated links. One quick follow-up. What do you mean by "we were also working on updating requirements at URL to allow passthrough of alternate cases in the event that a respondent types instead of using copy/paste function"? In previous rounds of review I have been able to type in directly fake FB urls. Also, we think it would be more efficient for us to review the survey once all the changes in the programming have been incorporated.

Thanks again.

Best,

[REDACTED]

From: Kristen L Hannum <[REDACTED]>

Date: Friday, September 20, 2019 at 12:07 PM

To: [REDACTED] >
Cc: Janel Koval <[REDACTED]>, Grace Yao <[REDACTED]>, [REDACTED]
[REDACTED] Katie Czyz <[REDACTED]>, Nathalie Sun <[REDACTED]>
Subject: Re: Project Mercury: Links Provided Follow Up for Confirmation

Hi [REDACTED] and [REDACTED]

Thank you for your patience--we were also working on updating requirements at URL to allow passthrough of alternate cases in the event that a respondent types instead of using copy/paste function. The survey has been updated and is ready for your review (links attached). When testing, please note:

- Each link is unique and may only be used once
- You will need to clear the cache/cookies within browser to test each new link
- If you have access to Decipher survey platform, please make sure you are not logged in when you test.
- Upon completion of the survey, you will be re-routed to the survey portal of the vendor. For metered links this will appear as a blank screen. For non-metered sample, this will appear as a note that you are not qualified for the survey. This is OK as authentic respondents will pass information to trigger appropriate screens in their sample provider's portal.

Updated survey criteria and invitations are reproduced below. Please let us know if any feedback. We will look out for your approval of materials and any updates to URL verification process. Thank you!

All the best,

Kristen

Terminations (Status=Terminate, @End of screener section)

1. Age <18 (Terminated immediately)
2. Age >64
3. Employed in Journalism/Media
4. Decline to answer income

5. Never use Facebook
6. Uses Windows smartphone
7. Does not use smartphone

Eligibility (Status=High quality/Not qualified for invitation to baseline)

1. Not willing to deactivate Facebook account
2. Did not provided searchable Facebook URL

Quality (Status=Low quality/Not qualified for invitation to baseline)

1. Length of interview<3 minutes. *(Final minimum length to be decided after reviewing distribution in field)*
2. Minimum of 75% of survey not answered
3. Age/Gender not matched to panel values
4. OE, Social_Impact, is copy/pasted or gibberish *(all other responses OK, including blanks)*
5. Did not answer all "required" questions: Q8/Q8a, Q17, Q18, Q19, Q20

Invitations

Non-Metered

Default notification to read "Experience Study"

Non-Metered

Subject: Participate in Important Experience Study

Hello {Name},

You've been invited to participate in a survey. The survey should take less than 10 minutes to complete and will determine if you are eligible to participate in a larger research study. You will be awarded \$1 in points for completing. Please take the survey as soon as you can as the link will be active until {duration}.

Click here to participate in our survey. {Survey link}

On Thu, Sep 19, 2019 at 7:03 PM Kristen L Hannum [REDACTED] wrote:

Thanks, [REDACTED] Our programming team is working on updates and we anticipate new links first thing AM.

Best,

Kristen

On Thu, Sep 19, 2019 at 5:30 PM [REDACTED] > wrote:

Hi Kristen and Nathalie, thanks for all these updates. We'll look for the hopefully final set of links soon!

To confirm about launch -- we totally agree. Let's launch on Monday. The biggest open at this point is how we're going to handle checking up on URLs/deactivation.

From: Kristen L Hannum <[REDACTED]>
Date: Thursday, September 19, 2019 at 2:07 PM
To: [REDACTED]
Cc: [REDACTED], Janel Koval <[REDACTED]>, Grace Yao <[REDACTED]>, Nathalie Sun <[REDACTED]>, Katie Czyz <[REDACTED]>
Subject: Re: Project Mercury: Links Provided Follow Up for Confirmation

Hi [REDACTED]

Thank you for the quick feedback! Please see my responses [here](#) and below. We have requested update and will provide updated links as soon as possible.

To follow up on launch, we generally do not recommend launching on Friday unless absolutely necessary. This is because of the lack of supervision (across all parties) over the weekend. However, we will also lookout for update pending the discussion on-going in the other thread related to verification.

Best,

Kristen

On Thu, Sep 19, 2019 at 3:19 PM [REDACTED] wrote:

Hi Kristen,

Thank you for sharing with us the updated links. We are almost there. [Here's](#) our feedback. We want to flag a couple of things:

1. We want to confirm that people responding to the age question that are less than 18 year of age are terminated immediately. In the current set of termination guidelines the termination age is listed at 13. Confirmed--sorry for the confusion here! This should have ready "Age <18 (Terminated immediately)"
2. Can we be consistent in the language across the survey invitation, survey intro, and questions in how we refer to rewards? We use "points" sometimes (e.g., intro) and "panel points" (e.g., deactivation question) -- is one better than the other? If we can just use points that's better because it's shorter. Yes, I will update to "in points" universally. This disparity originated because of different in default language used by panel partners.

Do you think we can have the feedback incorporated today, so that we can go over the links and hopefully launch tomorrow?

Best,

[REDACTED]

From: Kristen L Hannum <[REDACTED]>
Date: Thursday, September 19, 2019 at 5:05 AM
To: [REDACTED]
Cc: [REDACTED], Janel Koval <[REDACTED]>, Grace Yao <[REDACTED]>, [REDACTED], [REDACTED], Katie Czyz <[REDACTED]>, Nathalie Sun <[REDACTED]>
Subject: Project Mercury: Links Provided Follow Up for Confirmation

Hi [REDACTED]

Links were sent as a reply to thread "[PRESCREENER LAUNCH DETAILS FOR FINAL APPROVAL". Per your request, here is a second message for confirmation and links again attached here.

If any difficulty accessing or feedback for the survey, please let me know. Thank you!

All the best,

Kristen

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Kristen Hannum

Sr. Research Analyst, Syndicated

Media Analytics Primary Research

[REDACTED]

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Kristen Hannum

Sr. Research Analyst, Syndicated

Media Analytics Primary Research

[REDACTED]

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Kristen Hannum

Sr. Research Analyst, Syndicated

Media Analytics Primary Research

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Kristen Hannum

Sr. Research Analyst, Syndicated

Media Analytics Primary Research

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Sr. Research Analyst, Syndicated

Media Analytics Primary Research

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Sr. Research Analyst, Syndicated

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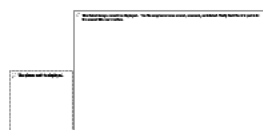


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Kristen Hannum

Sr. Research Analyst, Syndicated

Media Analytics Primary Research



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Best,
Nathalie

Nathalie Sun

Director, Media Analytics Consulting

Nielsen



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Kristen Hannum

Sr. Research Analyst, Syndicated

Media Analytics Primary Research

