

AMENDED Exhibit 920

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-0388

Bates Number: SNAP0464451-SNAP0464455

Custodian: ALTSCHULER_AARON; BEAUCHERE_JACQUELINE; BONIAKOWSKI_JEB; BOYLE_DAVID; OSBORNE_ALEX; STOUT_JENNIFER; TRAN_ABBY; WAINSCOTT_KIP; YADEGAR_NONA

Author: RACHEL HOCHHAUSER

Filename: 9324B347E976110ED9254E6FFA5E2B7830F46608AD4ED1F2DBAB54FD03647559.EML

Create Date: 7/24/2023 10:33 AM

Last Modified Date: 7/24/2023 10:33 AM

TNAG BEGBATES:

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MAAG BEGBATES:

MAAG ENDBATES:

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From: Rachel Hochhauser [REDACTED]
Sent: 7/24/2023 10:33:42 AM
To: Aaron Altschuler [REDACTED]; Abby Tran [REDACTED]; Alex Osborne [REDACTED]; David Boyle [REDACTED]; Evan Geary [REDACTED]; Jacqueline Beauchere [REDACTED]; Jeb Boniakowski [REDACTED]; Kip Wainscott [REDACTED]; Nima Mozhgani [REDACTED]; Rachel Racusen [REDACTED]; Jennifer Stout [REDACTED]; Nona Yadegar [REDACTED]

Subject: Read out from the National Student Safety and Security Conference and Workshop

All,

Sharing a [read-out](#) (below and linked for ease to comment) of Snap's participation in the National Student Safety and Security Conference and Workshop on July 20-21 in New York City, attended by school officials, educators and school safety officers. The results of the before and after survey we gave to the participants in the roundtable discussion is [here](#).

Snap was a platinum sponsor of the conference. JB and Rachel gave a 30-minute Safety presentation which covered an overview of the app, how (and why) we are different from other platforms, our safety values, a sampling of our safety initiatives, and an introduction to how we work with law enforcement. The session was well attended (estimate 200 people in the room) and appeared to be well-received. A show of hands indicated that the majority of the participants in the room used Snapchat, though none indicated familiarity with our emergency data disclosures or Family Center.

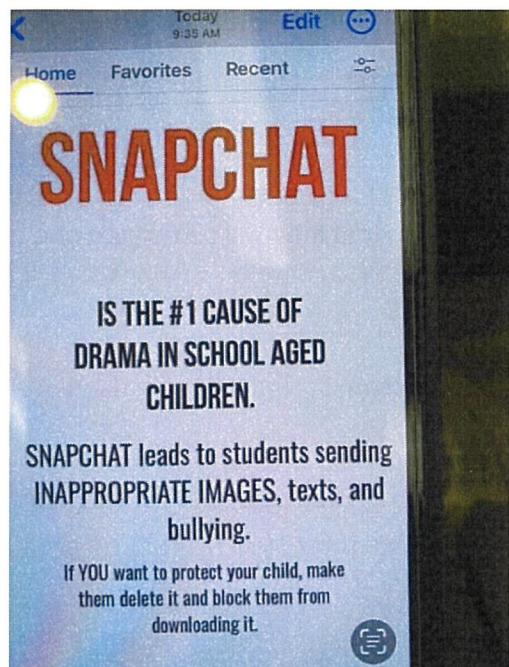
Jacqueline, Rachel and [REDACTED] then met with a group of participants who self-selected to participate in a roundtable discussion ("A Conversation with Snap") about their experiences on the app and how Snap was surfacing in their schools. There were 8 participants in the conversation - 2 school officials and 6 members of school safety (law enforcement) from Alabama, Ohio, New Jersey, New York, Virginia, Wyoming, (one LE official from NJ left the room for a phone call and did not actively participate). It was our collective impression that they shared openly with us and we all found it to be a very productive and interesting conversation and that we should participate in the remaining two of the organization's conferences this year (October and November).

All participants said that Snapchat is a part of their everyday life at school, and said both parents and students regularly report to them harm or concerns connected to Snapchat. Specifically, they named their most concerning interactions with the app as those involving threats of "violence," and "shooting threats," but called out the whole range of issues including bullying, the sending of nudes and financial sextortion of males; "It always goes to Snapchat." (note that nobody specifically named drugs as a concern). They keenly observed that the very things that attract teens to Snapchat - privacy, autonomy and perceived ephemerality - is what makes policing it difficult. (VA SRO: "Threats are getting out of control over Snapchat," adding he addresses threats to shoot 1-2 x/month; from another: "Snapchat is becoming more of a distraction everyday." From the SRO in OH: "They're doing everything in Snapchat because they think parents and teachers won't find it; the think it's super-secretive and private.")

Most participants acknowledged positives of the app, notably the opportunity for teens who were feeling isolated or inclined toward self-harm to express themselves, as well as the opportunity for students to report threats of violence and concerns about classmates. (From one WY official: "Snapchat can be a good thing; it allows (students) to put the emotion out there, instead of keeping it in here.")

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Most took the approach that Snapchat (and social media generally) is here to stay and they were looking for ways to empower and educate students and parents. Most participants seemed to agree that the adults who took a “just don’t use it” attitude toward Snapchat were driven by fear of something they don’t understand. However, one participant, who is an admin at the school district level in Alabama and also heavily involved in the National Association of School Resource Officers, said his approach is to tell parents to keep their kids off app and shared that his upcoming start-of-school newsletter will include this graphic.



Notably, we asked for the opportunity to give helpful links/ text to also provide and he said he would.

Asked about their wish lists for what we could do to improve safety on the app, one educator summed it up by saying that his ultimate wish was “more informed adults.” Others agreed that there was a collective desire for easily digestible materials that they could provide parents and students that could advise parents how to partner with their kids for safe Snapchat usage, a list of dos/don’ts and an explanation of how to spot and respond to harm. We noted that such materials were in the works.

The group was largely unaware of the ways that Snap interacts with law enforcement, methods for parents/educators to report off-app or any safety features or resources that we already provide.

Below is a summary of some notable feedback:

Positive

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- Snapchat “makes space” for kids who are “vulnerable and need help” to express themselves and friends report it to school/ school safety. Opportunity for intervention in cases of self harm.
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- Gives kids a chance to report violent threats they view as serious; often starts with a whistleblower.
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- Benefits of SC - privacy, autonomy and disappearing messages (but pointed out that those same benefits that draw teens to the app also present the problems that lead to the issues they are facing in schools).

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- School official (administrator) noted that IG is “worse” because students are using it to create groups that promote hate; he added that on Snapchat, the problem is “proving it” when something bad happens.

Negatives

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- They described themselves as being “slammed” with Snapchat issues, and called it a “distraction.” - Posting pics of guns with messages, “Don’t come to school tomorrow.”
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- Private stories are where many of the issues take place, with kids thinking that they will be notified of a screenshot, and not thinking about how else content could be captured and shared.
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- The taking and sharing of nudes was described as the “never-ending” problem.
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- One school official (AL) compared it to vaping without anyway to actually detect it being brought into schools; (Between Snapchat and Juul, I’m involved (as a superintendent) 2-4 times per week.”)
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- Students believe that they have total anonymity on SC and are not aware that they have any accountability. (From one WY official, “They (teens) want to live in their own world, outside of what we want.” He added that the very conversation we were having “goes against why teens want Snapchance ... Snapchat was never created for reporting.”)
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- For adults (i.e., parents and teachers), they said Snapchat is a “triggering comment.” From the WY official, “It’s a defense mechanism to something they don’t understand.”)
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- SRO from OH said nudes are an issue “every day,” from as young as 3rd and 4th graders (9-10 yos). “Most of what we have originates on Snapchat.”)
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- Said parents are approaching them with complaints and apportioning the blame, while assuming little responsibility themselves. (From one: “Parents come to me and ask, ‘What are you going to do about it,’ but they share some of the responsibility, too.”)

Take- Aways/ Opportunities

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- Students and parents are actively reporting bad actors to educators and school safety officers, so these officials are a good and available conduit of information. However, they are largely unfamiliar with what we currently offer in terms of tools, features and resources and are in need of “train the trainer” materials.
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- Product Ideas

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- Family Center - Toggle "don't allow my child to receive nudes," which would screen out any nude imagery in communications
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- Want to be able to stop access
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- Improve age-verification
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- Improve and extend reporting methods off-app
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- Outreach

- Advertising that focuses on the confidentiality of reporting and age limits
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- Parents will turn to Facebook and Facebook groups, Apple, Google for their information. Need to put the information where parents are.
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- Target National Associations of Parents and Teachers, Statewide School Safety mechanisms (School Safety Taskforces within the State Dept of Ed exist in most states).
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- Suggested vehicles and avenues to distribute materials (e.g., dos/don'ts, risks to look for, how to help stay safe):
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- Send to parents in the welcome back to school emails
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- New safety material to show at freshman orientation (downloadable from the web)
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- Video the SROs could show to students
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- Show it to the school boards
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- Email to parents
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- Leverage high-profile celebs (with teens) to deliver messages
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- Help parents partner with their teens

Please let us know if you have any questions.

Rachel, JB and K [REDACTED]