

AMENDED Exhibit 928

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

From: Peter Sellis [REDACTED]
 Sent: 8/23/2018 6:17:16 PM
 To: revprodmgmt [REDACTED]
 Subject: Fwd: User Research Readout - 10 HS / College students

opens Snapchat 500x/day

94 active streaks, 1000+ longest

Hope you guys find these interesting.

-ps

----- Forwarded message -----

From: [REDACTED] via consumer-pm <[REDACTED]>
 Date: Thu, Aug 23, 2018 at 2:01 PM
 Subject: User Research Readout - 10 HS / College students
 To: consumer-pm [REDACTED]
 Cc: Morgan Hammerstrom [REDACTED], Jeremy Voss <[REDACTED]>

Hey all,

Please see the [Final Report: August 2018 Snap Maps Interviews by \[REDACTED\]](#)

- 544 minutes (~9 hours) of video (worth watching a few)
- 140 pages of notes

Links to interview notes + videos: I highlighted users I thought we're the most interesting. The best nuggets are in actually watching the videos. I'd recommend setting up time with your eng team to watch relevant parts. We're gonna try to do lunches in NYC where we sit and watch interviews for an hour.

- 1) [Max, M17](#): strong habit of using Maps, all types of use cases, doesn't like Explore (called it 'useless,' but he knew what it was), didn't know what heatmaps were, shares to everyone, not concerned about privacy.
- 2) [Conor, M17](#): FMF power user, barely uses Snap Maps, always in Ghost Mode, doesn't want to share location to 400 people.
- 3) [Katie, F17](#): opens Snapchat 500x/day, opens Maps 20x/day, all types of use cases, knew Explore but doesn't use it often, had no idea how to even go on ghost mode, shares to everyone, not concerned about privacy.
- 4) [Harrison, M20](#): opens Maps 5x/day, but he often forgets about it because he doesn't have an obvious button to open it, shares to everyone, not concerned about privacy, opens it for boredom, not to find specific people, had never seen Explore in his life even though he uses Maps daily.
- 5) [Taylor, F17](#): shares to everyone, privacy not a concern, has never considered ghost mode, has never clicked on Explore intentionally, & wrong on many aspects of Maps: she thought background location was always on like FMF, had no idea how to exit the Maps for the longest time, thought 0 out of her 3 best friends were not on Maps: turns out 2 of 3 are on Maps (she can't see them in the masses of bitmojis).

- 6) Sofia, F15: opens Snapchat 30x/day, but Maps only 1-2x/wk, shares to everyone, not concerned about privacy, uses ghost mode to hide her location at certain times, had no idea about Explore.
- 7) Riley, F17: Snapchat power user (94 active streaks, 1000+ longest), but often forgets Maps is a feature because there's no obvious button to open it, excitedly set location to "my friends, except" when I told her about it (didn't know it existed before), uses Maps regularly, but had never seen Explore.
- 8) Trevor, M19: opens Snapchat 200x/day, but Maps only 2x/wk, has never shared his location publicly on Maps, but says he will turn it on soon, had never clicked on Explore purposefully,
- 9) Eleanor, F15: #1 power user of Maps, opens it 5x/day, her intent hit every major use cases, constantly toggling ghost mode on and off, she would love to be able to actively share her location as an update to 'flex' to her friends, turned her location on for the first time this summer only because she loves how cute her bitmoji looks, never looks at Explore.
- 10) Kendall, F14: opens Maps 10-20x/wk, only opens it when looking for specific people or groups (not as a boredom thing), hasn't made a bitmoji yet, only shares her location with 10 close friends, had never clicked on Explore before, didn't know what heatmaps were.

Here's a summary of the key insights for non-Maps:

- It's amazing how many of their streaks and "best friends" are people they've never met, nor plan to meet
- The speed at which they crank through chat and stories is ridiculous
- "Power users" often don't know basic functions of the app
- Almost none of them watch Discover
 - Seems like they have so much to take care of with chats, then stories, that they don't have time
- IG Stories vs SC Stories - it's really the habit and brand of what you use Snapchat for that keeps SC stories (real life) going for this age group
 - Funny comment about how he could never post a "sunset" on IG, everything needs to have your face in it, but he could do so on Snap

1. Make 24hr text save the default in 1-1 convos

- This is something I wouldn't have learned if it wasn't for me doing these interviews. These kids have so many conversations going in Chat that they can't keep track of them all. Especially for replies that might take an hour to come in, you'll get the reply, and not even know what the person is replying to you about.
 - I saw this over and over again.
- In 1-1 convos, nobody has changed the setting to 24hr text saving (I doubt anybody knows you can change it. I didn't until [REDACTED] did it in our 1-1 chat the other day).
- Several people called out that they prefer group messages in Snapchat because of 24hr text saving.
- I think making a change like this would allow Snapchat to steal even more texting use cases away from iMessage. (Doing to iMessage what Snap Maps is doing to FMF: something you only use with your parents)
 - I was also surprised by how much Snapchat is taking over texting from iMessage. Several people saying they do 75%+ of their texting on Snapchat now.

2. Low-hanging fruit -- Fix group stories: put the 'prompt' back in the friend stories section, not the "For You" Discover section.

- I heard several people say their group stories died out after the group stories got put in the Discover section
 - The prompt was made worse = less people did the behavior = lower view counts = less motivation to continue making group stories.
- This was a common complaint. People have come up with their own unique hacks of how to find their group stories (like putting their own name in chat, etc)

3. Low-hanging fruit: Allowing the 'swipe preview' of snap messages again.

- Heard this over and over. It was a popular part of the design of using Snapchat: sliding the screen a little to see what the chat is, without having an 'official open' happen.
- Lot of weird social norms on Snap, and this change made it harder to abide by the social norms.

4. Fixing the flow of group chats:

- IDK the answer, but it seems very odd that when you haven't opened your active group chat in awhile, you get shown all the video/pictures first, and then the text second. I'd watch some kids use their group chat, see all the video/pictures first, and then see the text. And the text is often in response to certain videos, but by that point, you don't even know what text is associated with what videos.
- Should all content be shown in chronological order, regardless of content type? IDK.

5. Responding to so many people's snaps can start to feel like a 'chore'

- Just something I noticed with how many snaps these kids send each other, especially with people they aren't even friends with in real life. Sending pointless half face pics with people you wouldn't even say hi to in real life.
- With 20 unopened messages staring you in the face, some kids mentioned it was almost like a chore to clear them all.

Non-Snapchat Insights

1. Stories on IG v Snap

- Seemed like all 10 of the people I interviewed prefer Snap Stories over IG. Many have never even created an IG story. I was just surprised, because in my peer group (26 year olds), very few people still post Snap Stories.

2. VSCO:

- Several of the young girls I interviewed actively use VSCO. And they would rate it as either on par with IG, or even favored over IG. Where IG might get 1 highly-edited photo from an event like Outside Lands, VSCO gets the 15-20 others that are only lightly-edited.
 - VSCO is super interesting to me. It feels like if Snap took a page from IG and tried to copy IG features, it would just create VSCO.
 - Whereas IG is the 'social validation machine' driven by public displays of likes, VSCO is the 'raw, unfiltered' version with no social norms (because there are no public likes). Just your friends posting lightly edited photos from their life.
- From [Eleanor, F15](#):
 - Q: Why use VSCO, why not just IG?
 - I use it for the photos that didn't make it to IG. A cool photo I take, I'll put it into VSCO.

- Less of a (social) norm on VSCO. No rules like "you cant post twice in one day, it has to be edited."
- You can do whatever you want on VSCO.
- I like VSCO better than IG in some ways like that.
- I like how you cant see the number of likes and reposts. It makes what people post very raw.
- I like seeing photos that aren't super edited.

3. Twitter > FB for kids because it has a unique value offering that nothing else can provide.

- None of the 8 HS kids had Facebook. And most couldn't even see themselves ever getting it.
- But some of them did use Twitter, or at least see why people do use Twitter. Made me a little more bullish on the future of Twitter.

4. YouTuber [Emma Chamberlain](#) (4M subs in only 1 year of posting videos) is the 2x personification of the HS girls I interviewed.

- I think at least 4 of the 6 girls I interviewed called out Emma Chamberlain as who they like to watch on Youtube. I could see a lot of similarities between the 14-15 y/o girls I interviewed and Emma. Emma feels like if you took Eleanor's personality, and multiplied it by 2.
- Also, shoutout to Curology for using Emma in their Snapchat ad (showed in Taylor's interview). Smart alignment of influencer + ad recipient.

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