

AMENDED Exhibit 942

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: Rachel Racusen [REDACTED]
Sent: 8/3/2018 8:05:38 AM
To: [REDACTED]
CC: [REDACTED]; Jennifer Stout [REDACTED]
Subject: Re: snapchat fueling mental illness

Sorry for delayed follow up on this this morning -- but Marketwatch's piece turned out OK and didn't overly single us out, so I think not engaging was the right approach here.

We have a full roundup of the coverage this got in clips -- not a huge amount of mainstream US pickup, but CBS This Morning did mention it as a 15 second news read through in their 8:30 am block, and completely focused on Snapchat, which is frustrating (I think largely because we are the more well known company listed in this paper, and because this phenomena has been dubbed "Snapchat dysmorphia" -- which is really unfair. Here's the TV Eyes clip: <http://mms.tveyes.com/PlaybackPortal.aspx?SavedEditID=28a04aca-54ef-4518-87cd-22c20ea27d1e>

CBS reached out to us pretty late on this, and not sure we would have gained much by engaging given how short their mention was, but I am planning to call their producer about the study not just being about us or including anything new, and how skewed an image this presented to their viewers.

<https://www.marketwatch.com/story/the-unsettling-relationship-between-selfie-filters-and-plastic-surgery-2018-08-02>

The unsettling relationship between selfie filters and plastic surgery

Marketwatch

By Kari Paul

August 2, 2018

Your social media feed could be bad for your health.

Photos on Instagram FB, +0.67% Snapchat SNAP, +1.19% and other platforms are fueling a rise in mental health disorders, skewing users' self-perception and inspiring them to seek out plastic surgery procedures, a paper published in the Journal of the American Medical Association on Thursday said.

Photo editing apps and social media have caused people to compare themselves to unrealistic beauty standards, and can even lead to body dysmorphic disorder (BDD), it said. BDD is classified as a form of obsessive compulsive disorder in which a person becomes excessively preoccupied with a perceived flaw in appearance.

People are seeking changes to very small perceived flaws after spending too much time on social media, said Lara Devgan, the chief medical officer at plastic-surgery platform RealSelf.

"I've noticed an uptick in people looking for what I like to call micro-optimization — tiny, millimeter-level changes that together make the face look better," she said. Examples include requests for slightly fuller lips or narrower noses. "This is the principle behind Snapchat filters, and it has become the new norm with aesthetic medicine and plastic surgery."

Many patients don't realize the images they constantly see on social media are airbrushed, the paper said. Meanwhile, cosmetic surgery jumped 11% in 2017, with consumers spending more than \$6.5 billion on procedures that year alone, according to the American Society for Aesthetic Plastic Surgery, a trade group.

The number of cosmetic procedures of all kinds has increased 115% since 2000, which many surgeons attribute to the rise of social media. The majority of plastic surgeons (66%) say that patients request procedures such as lip fillers based on posts by social media stars like Kylie Jenner.

More than 40% of surgeons in a recent American Academy of Facial Plastic and Reconstructive Surgery survey said looking better in selfies on Instagram, Snapchat, and Facebook FB, +0.67% was an incentive for patients getting surgery.

Doctor Michael Byun, a cosmetic surgeon in Chicago, said he has seen an increase in teens coming in for lip procedures citing photos of Kylie Jenner as inspiration. He struggles to balance their wishes with what is best for the patient.

“Patients are the most important person in the equation,” he said. “But I should be protective of my patient and be an advocate. We surgeons should do procedures benefiting their physiology as well as their psychology.”

Before Instagram and Facebook, patients would bring images of celebrities to their surgeons. But now, in a phenomenon dubbed “Snapchat dysmorphia,” patients bring in edited versions of their own faces created with the retouching app Facetune or Instagram or Snapchat filters, showing fuller lips, bigger eyes, and a thinner nose, the researchers said. (Facebook, Instagram, Snapchat and Facetune did not immediately respond to requests for comment.)

“This is an alarming trend because those filtered selfies often present an unattainable look and are blurring the line of reality and fantasy for these patients,” the authors of the JAMA article wrote. The paper was co-authored by four doctors at the Boston University School of Medicine based on their experiences.

The trend isn’t just limited to women: Men accounted for 8% of those who got plastic surgery in 2017, up 1% from 2016. Men received contouring procedures such as liposuction (up 23%), tummy tucks (up 12%) and male breast reductions (up 30%) over the past year.

On Thu, Aug 2, 2018 at 3:12 PM, Rachel Racusen [REDACTED] wrote:

Doesn't look like Kari has posted yet, and agreed that I don't expect this to get much traction. I think we can leave it be for now (I like the ideas of working him on background, but still think it could make us more the focus of this than we want to be).

On Thu, Aug 2, 2018 at 2:01 PM, [REDACTED] wrote:

I agree with you both -- the idea that filters have given us unrealistic expectations of beauty is well-traveled territory and while it may get a bit of steam, most people can acknowledge that this is not a Snapchat-lead problem. Especially if there aren't new stats here.

Would it be worthwhile to point out off record that our Lenses encompass a vast variety of animations and effects that can be silly, world-facing, games with friends, etc.?

(And hopefully in the next ~3-6 months we have strong research findings from our grad research that shows the positive effects of creativity and self-expression with friends on Snap outweigh the cons and can make some noise with that.)

On Thu, Aug 2, 2018 at 9:26 AM, [REDACTED] wrote:

Since there is so little there, there, I'm with you on not commenting. If anything we should ask them to correct that you can't access Lenses with a swipe, and send them all of the examples of Lenses that make you look absolutely ridiculous. I don't expect this to get much traction and think we would only lend legitimacy by responding. Let's let Facetune carry the water here!

On Fri, Aug 3, 2018 at 00:16 Rachel Racusen [REDACTED] wrote:

A reporter from Marketwatch just reached out to us about a new study published in the Journal of the American Medical Association (which is pretty legit), that claims "Snapchat selfies are fueling mental health disorders and ultimately plastic surgery in young people." I asked him for the study, since it isn't live on JAMA's site yet, and he sent me the attached PDF, which looks more like an issue paper summarizing a few recent studies as opposed to a new study. The study references this piece from the Huffington Post from last Feb, which some of you may remember: https://www.huffingtonpost.com/entry/snapchat-dysmorphia_us_5a8d8168e4b0273053a680f6

I'm not suggesting we comment -- esp since this doesn't appear to be a new study, but wanted to flag for this group and see if folks had thoughts in general.

Seems to me like:

- 1) A bit odd this paper focuses on Snapchat and Facetune, but not Instagram
- 2) I don't see the specific claim in this paper that Snapchat is fueling mental health disorders (in terms of any new stats, etc)

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

From: **Snap Communications** [REDACTED]
 Date: Thu, Aug 2, 2018 at 11:20 AM
 Subject: Fwd: snapchat fueling mental illness
 To: [REDACTED] [REDACTED] Rachel Racusen [REDACTED]

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

From: **Kari Paul** <kari.paul@marketwatch.com>
 Date: Thu, Aug 2, 2018 at 4:15 PM
 Subject: snapchat fueling mental illness
 To: [REDACTED]

Hello, I am writing about a new study that claims Snapchat selfies are fueling mental health disorders and ultimately plastic surgery in young people, published today in The Journal of the American Medical Association. Do you have any comment on this? My deadline is noon EST but happy to update the piece if you reply after that.

Thanks!

--
 Kari Paul
 Personal Finance Reporter

MarketWatch

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Redacted by the sender

Rachel Racusen
Director of Communications

[REDACTED]

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