

AMENDED Exhibit 945

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: Morgan Hammerstrom [REDACTED]
Sent: 1/5/2021 2:38:44 PM
To: [REDACTED]
CC: Jacob Andreou [REDACTED]; Ceci Mourkogiannis [REDACTED]
Subject: Re: Inclusive Camera Survey

Perfect, thanks for setting this up, [REDACTED]. Looking forward to this discussion.

On Tue, Jan 5, 2021 at 2:03 PM [REDACTED] wrote:

Hi All,

I've sent an invite for the 14th for all here to gather. Please let me know if that day will not work for you all.

Thanks!

On Mon, Jan 4, 2021 at 4:37 PM Jacob Andreou [REDACTED] wrote:

I found these results really fascinating. Thank you for conducting such detailed research :)

I would love to get some time with this group over the next couple weeks to ask a few questions I have and dive a little deeper.

Ceci, could you please nominate someone from Design who could be included in that conversation in addition to the folks on this thread?

Thanks,
Jacob

On Tue, Dec 22, 2020 at 10:45 AM [REDACTED] wrote:

Hey all,

I wanted to share [the report](#) from our third round of Inclusive Camera research, a survey we ran with users 13-25. As a reminder, we previously ran two qualitative studies on this topic with [users 13-25](#) and [internally with employees](#).

The summary below reflects insights from all three rounds of research.

Please let me know if you have any questions!

Thanks,
[REDACTED]

Summary

This summary represents key takeaways from all three rounds of research (Internal qualitative, external qualitative, survey with users 13-25)

- In external qualitative research, users acknowledged they have experienced skin lightening in the Snapchat camera but did not perceive this to be a major issue when taking photos of themselves; overall, this was consistent with survey data

- This was a stark contrast from findings in internal qualitative research with an older audience; these users had much higher awareness of this happening and considered it a major and emotional pain point
- Younger users were more likely to attribute changes to their skin tone and appearance to their lighting or their own features, rather than the Camera or Lens itself
- Older users attributed these physical changes to the technology while younger users did not question the technology but rather how their own appearance or how they were taking the photo
- For younger users, the Camera and Lenses lightening their skin tone has become normalized; users expect this to happen. Because of this expectation, users didn't perceive physical changes to their skin tone/appearance to be as problematic. The prevailing mental model amongst these users suggests they don't know they are supposed to look any other way in the Camera or in a Lens
- From the survey, we observed similar findings. Half of users strongly agree or agree that the Snapchat Camera captures their skin tone well while 16% of users did not think the Snapchat Camera captures their skin tone well
- 41% of users strongly agree or agree the Snapchat Camera lightens their skin but of these users most rated this as being not at all a problem, consistent with what we found in qualitative research
- Across racial and gender cuts in the survey, skin lightening in the Camera and Lenses was not rated as a severe problem; however, the open-ends suggest this is still a major issue for users with numerous users mentioning things like "I look whitewashed," "Lenses aren't made for people of color," and "I want the Lens to capture my skin tone accurately"
- In another set of open ends, users were asked to explain why they felt they looked best in the Snapchat Camera; users overwhelmingly listed Beautification Lenses as the reason and overall, users were extremely aware of the beautification happening in Lenses
- Many of these open-end responses were troubling, with responses like "Bc the filters actually make me look decent instead of being a horrendous ugly black girl," "because it hides blemishes and makes my face look thinner and lighter than it is," and "I love the filters it hides my ugliness"
- Users were very quick to point to their own perceived physical 'flaws' with some highlighting the benefit of looking lighter in a Lens. While it is a positive users feel confident when using Lenses, users are simultaneously left feeling bad about how they look without one; this underlines a key issue mentioned in research with employees around 'Lens Dysmorphia'
- Since skin lightening has become normalized to users - a key takeaway from external qualitative research - it is not surprising users may feel they look better when it is applied; however, with or without users stating it explicitly, it is evident to the team that this normalization is problematic
- It is also important to consider other factors that may contribute to why users do not explicitly indicate skin lightening in particular to be a severe problem (i.e. colorism, society's privileging of eurocentric features) and that users in our core demo may not have the same ability to speak to these issues like older or internal users do
- We observed in all three rounds of research that users have difficulty with Lenses overlaying properly over their eyes, lips, and hair; in the survey, there were many responses specifically talking about the difficulty of using Lenses when wearing glasses and for users who identify as Black or African, an increased severity in Lenses not working properly with their hair
- Another key finding from the survey is that many users feel their Lens carousel is too gendered, something we also observed in internal research. Users who identify as Transgender or Gender non-conforming found this to be the most critical problem amongst those listed. In the open ends, many male users also mentioned wanting to see more Lens options that felt less feminine

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EA to Vice President of Product | Snapchat
Snap Inc.

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Morgan Hammerstrom

Product Research
Snap Inc.