

AMENDED Exhibit 946

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



Inclusive Camera Survey

Product Research

December 2020

Internal use only - Do not share

Overview

1. Research Plan Overview
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Research Summary



Research Overview

Research Plan

1. Internal, Qualitative Interviews [[Report](#)]

- 30 minute, 1:1 sessions
- 15 Snapchat Employees

2. External, Qualitative Interviews [[Report](#)]

- 10, 45 minute sessions over two days
- Mixed Race Users Age 13-25

3. Survey [This Report]

- N= 1000, US Only, Users Age 13-25
- Get a quantitative baseline understanding of what Cameras our users prefer and why
- Get an understanding of what problems users have or have not experienced with the Snapchat Camera/Lenses and their severity

Summary (1 of 3)

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 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

Summary (2 of 3)

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

- 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**

Summary (3 of 3)

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

- 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

Survey



Goals and Objectives

Introduction

The goal of this research is to quantify user sentiment and pain points around the Snapchat Camera and Lens experience, specifically as it relates to the Inclusive Camera.

This research builds on the goals of [the inclusive camera](#) - a camera that works perfectly for you regardless of your skin tone, beauty standards, or physical impairments.

Objectives

- Quantify user sentiment on the Snapchat Camera and Lenses
- Clarify user pain points with the Camera and Lenses and understand their severity
- Evaluate which Cameras our users prefer and why
- Assess if and how sentiment and pain points varies by Race or Ethnicity

Methodology

- 10 minute online survey
- n = 1069
- Age
 - n= **461** - 13-17 year olds
 - n = **608** - 18 - 25 year olds
- Device
 - n = **412** - Android users
 - n = **657** - iOS users
- Gender
 - n = **516** - Female
 - n = **484** - Male
 - n = **54** - Transgender, Gender Variant/Non-conforming
- Race
 - n= **49** - White/European or Northern Descent
- U.S. only

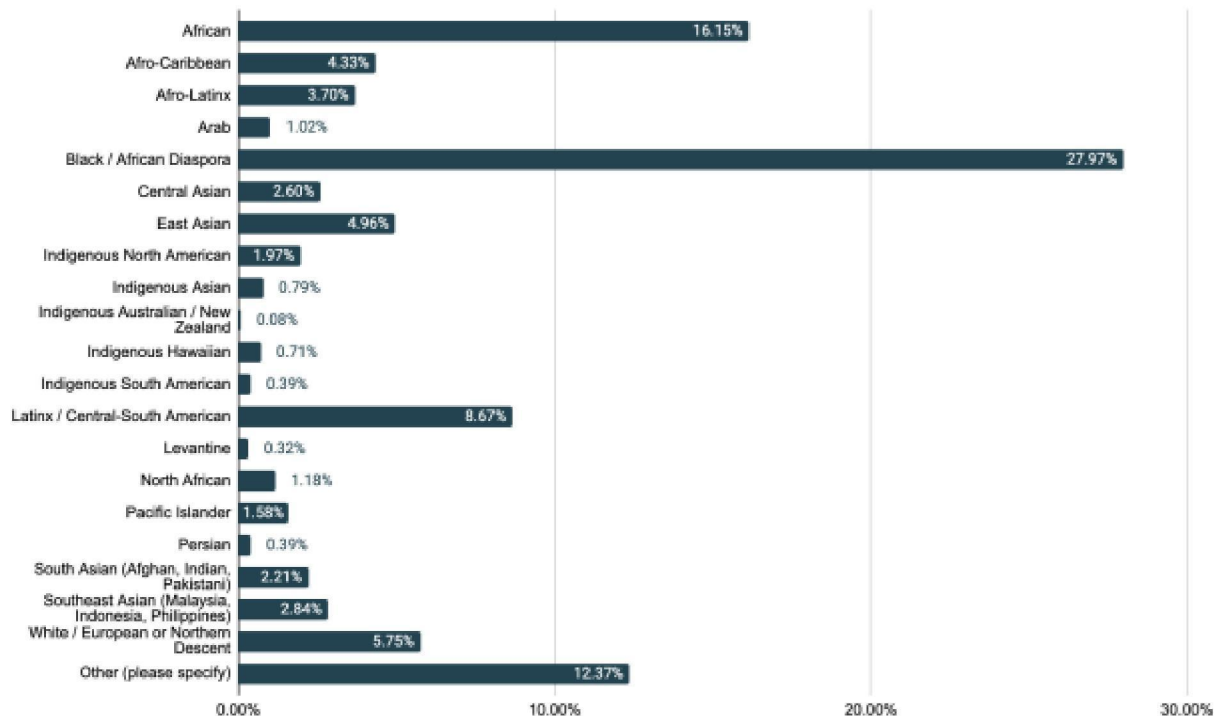
Participants (1 of 2)

- Age 13 - 25
- US only
- Mix Race/Ethnicity
 - **Note:** to ensure as diverse of a sample as possible, only a small sample size (n=49) was collected for users who identify as White
- Mix Gender
- Even mix of regions (Northwest, Midwest, South, West)
- Representative mix of device usage
- Must use Snapchat at least once a month

Participants (2 of 2)

Race and Ethnicity

Note: to ensure as diverse of a sample as possible, only a small sample size (n=49) was collected for users who identify as White



Q7- How do you identify in terms of race/ethnicity? Please select all that apply.

Survey Summary (1 of 3)

- When taking Selfies, 59% of users are doing so on the Snapchat Camera; 57% of users also felt they looked best in the Snapchat Camera
- In the open-ends, users overwhelmingly listed having Beautification Lenses as the main reason they felt best in the Snapchat Camera 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
- In the open-ends, many users also mentioned they felt they look best in the Snapchat Camera since it does not flip their face; this is consistent with findings from both rounds of qualitative research

Survey Summary (2 of 3)

- Half of users strongly agree or agree that the Snapchat Camera captures their skin tone well; 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
- Across racial and gender cuts, skin lightening in the Camera and Lenses was not rated as a severe problem; however, the open-ends suggest this is still an 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”
- 17% of users found it difficult to locate a Lens/Camera effect to use; in the open-ends, this problem came up frequently with users mentioning it can be difficult to find a Lens again once it leaves the carousel and that it is difficult to locate a Lens that works for two people
- 36% of users strongly agree or agree that Lens does not overlay properly over their eyes; in the open-ends, one of the most frequent pain points mentioned was users having difficulty using Lenses when wearing glasses

Survey Summary (3 of 3)

- 28% of users strongly agree or agree their Lens carousel feels too gendered; of these users, most identified this is a serious or moderate problem and users who identified as Transgender and Gender non-conforming found this to be the most critical problem (61%). In the open-ends, many male users also mentioned gendered Lenses and wanted to see more Lens options that felt less feminine
- Users who identified as Black or African were more likely to agree that a Lens does not work with their hairstyle; 37% of these users also rated this as a serious or moderate problem and this issue was also documented by users in the open-ends
- Another pain point that came up frequently in the open-ends were Lenses not overlaying properly over specific facial features (hair, lips, eyes); this is consistent with findings from both rounds of qualitative research
- In general, there were not many significant differences when looking at different racial and gender cuts other than the above; however, users who identify as Black or African were consistently more likely to rate pain points as problematic and experience them slightly more severely, which is consistent with what was observed during both rounds of qualitative research

Survey Findings



Please note: Only some gender and ethnicity cuts are displayed; any notable distinctions are listed - please reach out if you want more information on a specific cut

Users overwhelmingly listed Beautification Lenses as the main reason they felt best in the Snapchat Camera (1 of 2)

- Snapchat has filters and the filters make me look prettier
- A lot of the filters on snapchat make me feel less insecure
- I love the filters it hides my ugliness
- Filters and can make it look good and remove my facial flaws
- Because it literally has filters I feel confident as sad as it sounds but it's what I always use
- The filters snapchat provides helps me look my best
- I'm pretty insecure of my face and how my face looks so i like a little filter on it
- Because i can use filters to make myself look better
- Because the filters make my face look smaller and smoother
- The filters make you look perfect
- I like the filters they make me feel beautiful
- They posses wonderful filters which make your skin look wonderful which eliminates all blemishes and other just makes you beautiful
- I feel I look the best in these because I feel very ugly sometimes and it just gives me a very big build of confidence
- Because the filters hide my insecurities
- The filters really come through to make me feel even more beautiful and feel even more confident
- They have filters and I feel confident with their filters on my face. Because i feel like the filters make me look prettier than i really am
- Cuz im ugly and there's filters
- 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
- since the filter usually covers up my acne and make my face see, less fat it gives me more confidence
- The filters are amazing helps me hide my insecurities
- It pops out the color of my skin
- Insecure about how I look so i turn to filters to help
- The filters make me glow
- Because it has filters where u can hide your insecurities
- Because they changes my face tones it more
- Because you can have a way to change you features a little bit and I like that considering I have some insecurities about me.
- they have filters that make me feel good about myself
- There are a ton of filters that get rid of the bad parts of your face allowing you to really good pictures. Making me feel more confident in myself
- It brings out my natural qualities. It shows the purest quality of my skin and brings out my smile.
- There are so many filters and I can't rly see my flaws in it
- When I need it there's a filter to make me look less ugly
- There are a lot of cute filters that smoothen out my skin

Q12- Please explain why you feel you look best in this camera.

Users overwhelmingly listed Beautification Lenses as the main reason they felt best in the Snapchat Camera (2 of 2)

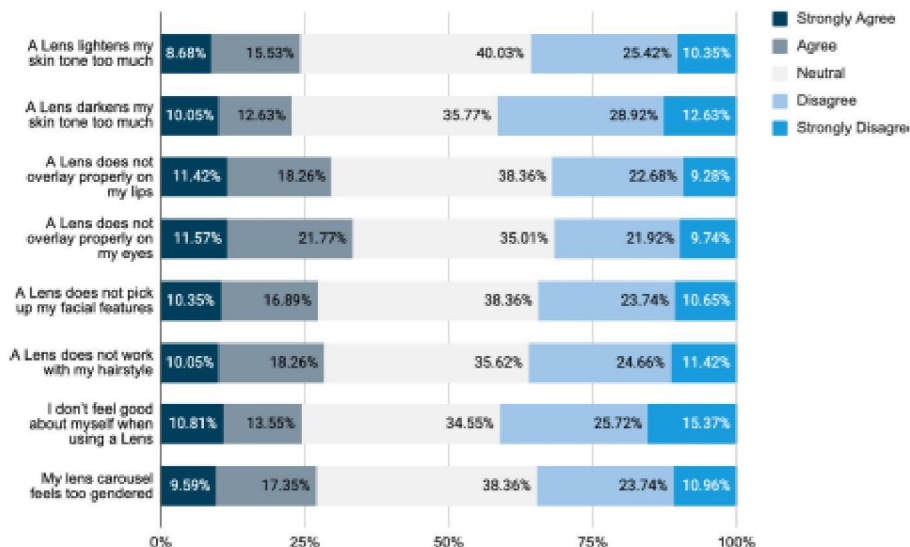
- Snapchat has beauty filters
- they have different filters that enhance my looks
- Less detail plus filters for my gross skin
- Because it has many filters , to use from and are very pretty you can have fake lashes, white teeth, or any filter you want!
- Snapchat has filters and it makes me look more nicer
- Because of the filters,it cancels all my blemishes
- I feel like I look best in snapchat camera because it hides my facial breakouts
- I feel I look best in this camera because of the filters. There are so many filters in Snapchat and I think it I look best when I use those filters
- Because their are alot of filters you can use and i feel very beautiful in filters also i look like im glowing on snap
- It's isn't 100% quality. it blurs stuff and personally hides my insecurities
- Makes my skin look clear
- Because it makes my skin glow
- Because the filters help with hiding my breakouts
- Because I can use filters and it makes me look prettier
- The filters make me look more pretty and younger
- I feel better with a filter on
- It's definitely the filters and the beauty effect that makes me feel the best in the way I look
- Because it has all these cool filters,even plain ones with nothing that make u look better...its not that your ugly but u just not photogenic and u look worst in photos so i use snapchat to try and balance that
- The filters makes me looks way younger and way more pretty without any actual work
- Snapchat has a lot of filters which makes my face glow up
- In the filers I feel unstoppable
- The filters blur my skin imperfections and the filters are cuter than the ones in any other app I've found
- The filter clears up most of the Acne on my face, I feel more self confidence Bc if I but on makeup while taking a pic my dark spots will get darker and I don't wanna break out more so I choose to take snapchats and not regular pictures
- The filters make my acne go away, that's my insecurity also
- Because it has the best natural looking filters and I fell more confident in those filters
- Because the Snapchat camera has filters and there's also one built into the camera so it hides some of my skin flaws and discoloration
- I feel the best in Snapchat cameras because it enhances my looks with a variety of filters to choose from, very high quality. Instagram also has filters, but not as good quality as Snapchat. I'm not a very good looking person so Snapchat helps a lot with my confidence in selfies

Q12- Please explain why you feel you look best in this camera.

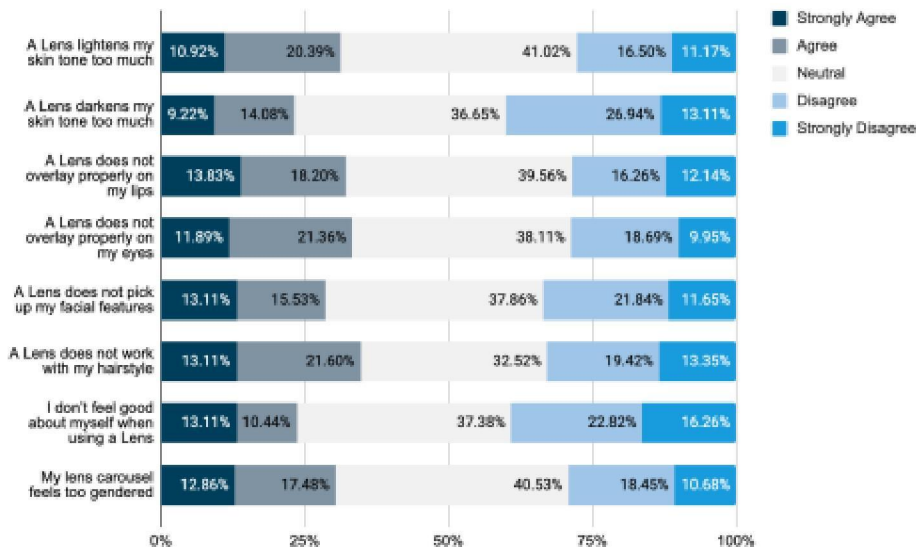
Lens Agree/Disagree Statements

Slight increases on Android for Lenses lightening and darkening skin tone

iOS (n=657)



Android (n=412)

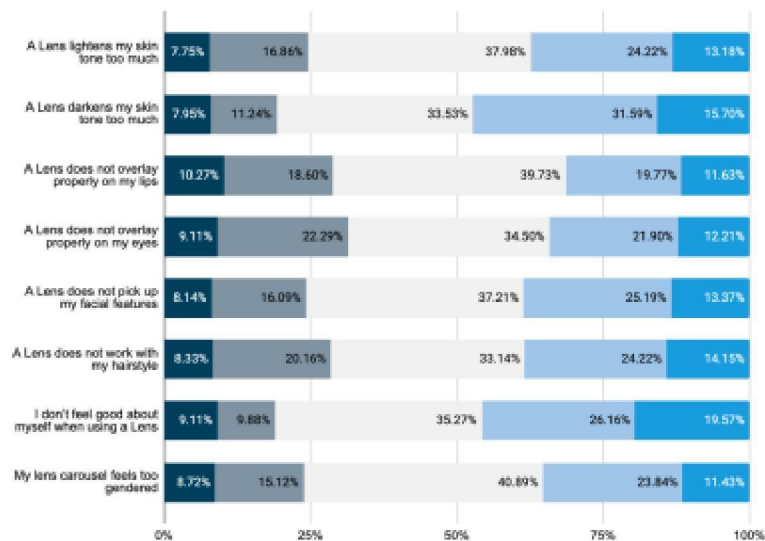


Q15 - To what extent do you agree or disagree with the following statements about the Snapchat Camera?

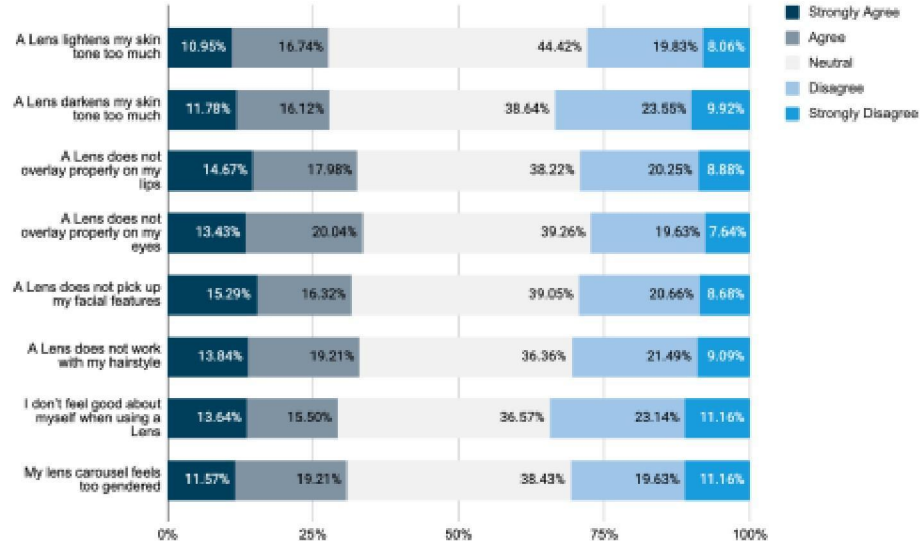
Lens Agree/Disagree Statements

Cuts by Gender

Female (n=616)



Male (n=484)

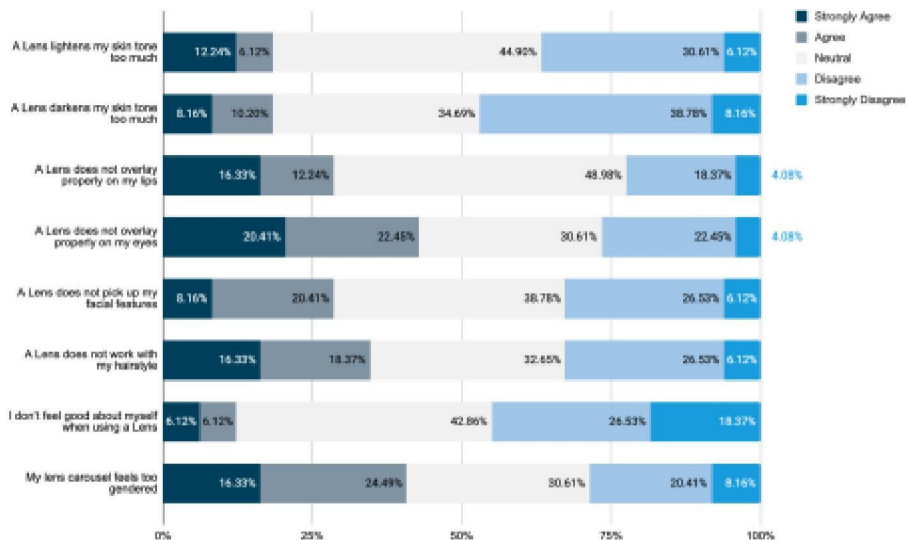


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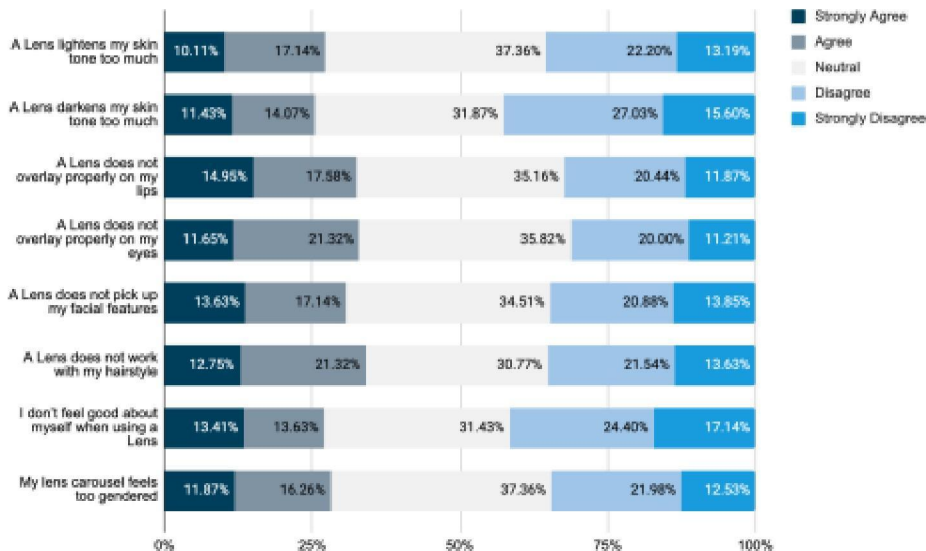
Lens Agree/Disagree Statements

Cuts by Ethnicity

White (n=50)



Black/African Diaspora/African (n=455)



Q15 - To what extent do you agree or disagree with the following statements about the Snapchat Camera?