

AMENDED Exhibit 952

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



Snapchat is being embraced as an antidote to a world where nearly every feeling, celebration and life moment is captured to be shared, logged, liked, commented on, stored, searched and sold.

New York Times, Feb 2013



ABOUT SNAPCHAT

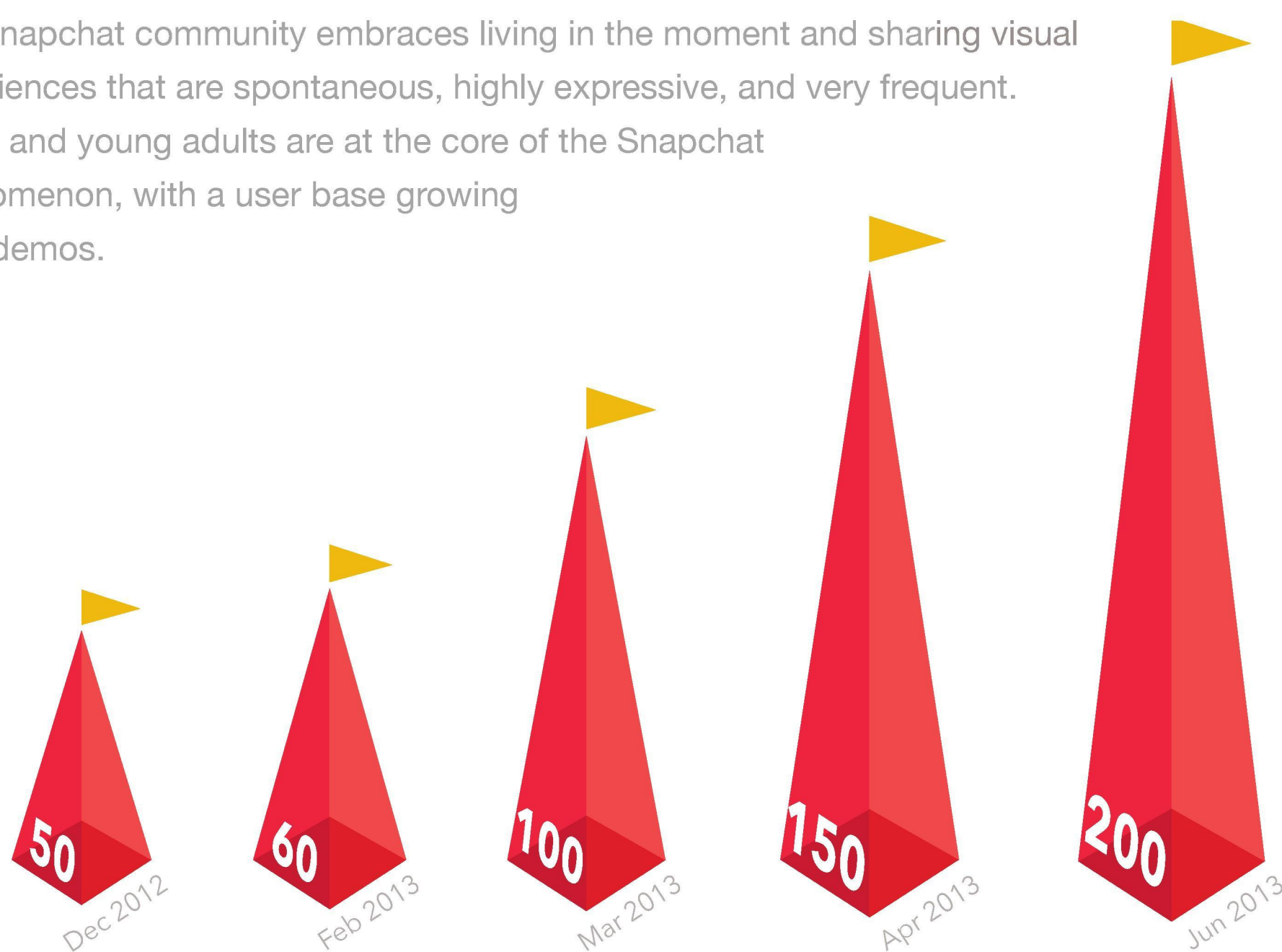
Snapchat has defined the phemeral media with its popular iPhone and Android application. Snapchatters take photos, record videos, add text and drawings, and send to individual friends or groups. Users set a viewing time of up to 10 seconds and when seen, content is deleted from the recipient's device and Snapchat's servers. Sharing moments with friends has never been more fun, easy or fast.

SNAPCHATTERS CELEBRATE SELF-EXPRESSION

The Snapchat community embraces living in the moment and sharing visual experiences that are spontaneous, highly expressive, and very frequent. Teens and young adults are at the core of the Snapchat phenomenon, with a user base growing in all demos.

MILLIONS OF MOMENTS

Millions of snaps shared every day



TEAMWORK

We are open to collaboration with like-minded organizations that embrace our philosophy and desire to share authentic moments that surprise and delight the Snapchat community. The spirit of personal, temporary and memorable communications defines the Snapchat experience and attracts millions of Snapchatters to share experiences for 10 seconds or less. Together, we have the opportunity to create magical moments of time that touch millions of people in a unique way.

BRIEF HISTORY

Evan Spiegel and Bobby Murphy began working on Snapchat in 2011. When Spiegel presented the prototype in June 2011 in front of his product design class for his final project, classmates balked at the idea of sending inpermanent photos. Snapchat was launched in September 2011 out of Spiegel's father's dining room. Snapchat is currently available for download on iPhone and Android smartphones.

CONCEPT

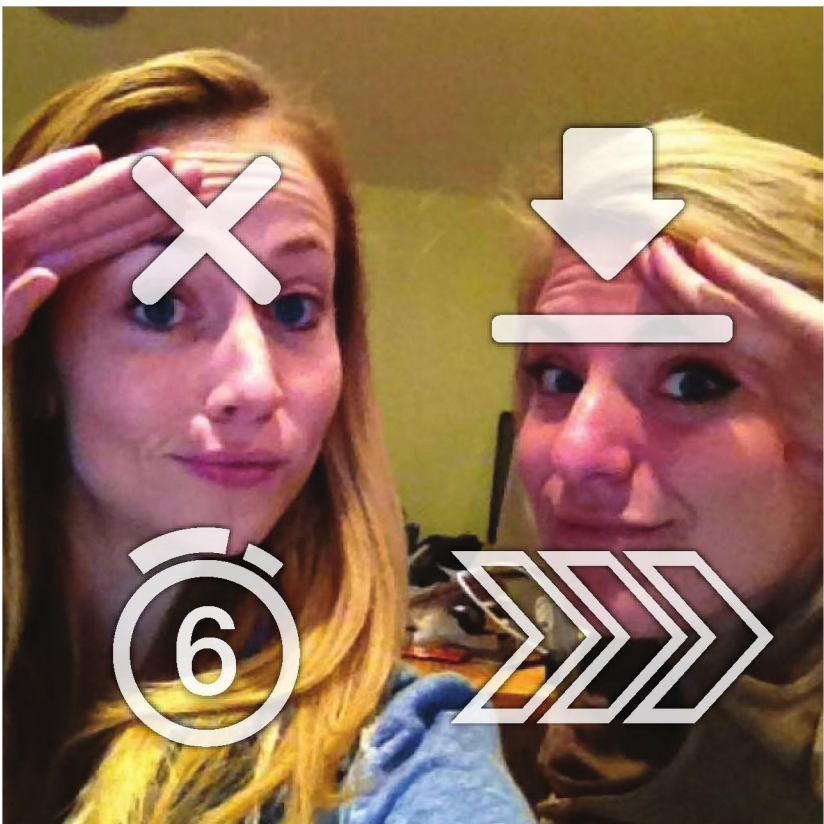
Snapchat micro is a fun and engaging addition to the Snapchat product that allows users to snap, send and save photos from their Samsung wristwatch. James Bond fans and espionage enthusiasts will delight in the ability to take self-destructing pictures and videos simply by touching the screen on their watch. Tapping the Snapchat icon on their wristwatch activates the application as well as the watch's tiny camera. With another tap the user captures the image or video and is then directed to a simple menu where they have the ability cancel, save to their phone's gallery, set the viewing time, and send the picture to their snapchat contacts (synched from the app on their mobile phone). If the Snapchat app on the phone is opened at any time during the process, the phone's screen mirrors the user's activity on the watch (captured image in the preview screen, selected contacts to receive the image, etc.). Additionally users can add a quick caption or drawing to the watch's captured image by using their phone. These additions will be reflected in both screens and the user can send the image from either device.

DESIGN



Capture

The Snapchat micro app captures the core of the Snapchat experience - capture and send, and helps us continue to be the fastest way to share a moment.



Preview

Best Friends		
Angelica Acosta	☐	A
John Abegg	☐	.
Mikey Watson	☐	.
Recents		
Ben Hoffman	☐	.
Ben Sagan	☐	Z

Friend List



Timer

Best Friends		
Angelica Acosta	☒	A
John Abegg	☐	.
Mikey Watson	☒	.
Recents		
Ben Hoffman	☒	Z
ey Watson, Ben Hoffman		»»»

Send

NARRATIVE

After saving money all summer from mowing lawns, washing cars, and babysitting his younger cousins, 13-year-old Evan was finally able to take advantage of the cell phone upgrade allowing him to get a brand new smartphone. His parents initially struggled with what to get him for his upcoming birthday, but were thrilled to learn that the new Samsung Watch was designed to work with his new phone! Evan now embarks on his final year of middle school equipped with ultimate gadget. His friends started using Snapchat over past summer and he is ecstatic when he learns that his new watch has been set up with the app installed. Sitting shotgun in his mom's car, he opens the app on his watch and points the watch's tiny camera at a nearby pedestrian. He takes a snap, sets the timer and sends it to all his friends without the smartphone ever leaving his pocket. Walking through the school's front gate he snaps another picture and pulls out his phone before sending. Happily, the preview of the photo has already synched to his phone and he adds a quick caption and drawing to it. He glances back at his watch--the changes have been updated already! He slips his phone away as the bell rings and begins choosing friends to receive his masterpiece, all from his watch's screen. As class drags on, he sends a few more snaps from his watch to his friends (that will no doubt be flabberghasted at his courage to Snapchat despite Mrs. Franklin's strict "use it you lose it" cell phone policy). Sure enough, the entirety of lunchtime is spent passing the watch around amongst his peers, humming James Bond theme music, hiding under tables and sending Snaps.