

AMENDED Exhibit 956

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: 12/3/2021 2:30:25 PM
To: Shelby Knox [REDACTED]
CC: Amanda Kloer [REDACTED] Nona Farahnik [REDACTED] Jacqueline Beauchere [REDACTED]
[REDACTED]; Dalia Hashad [REDACTED]; Jennifer Stout [REDACTED]
Subject: Re: Concerns about default features on Snapchat accounts for kids

Hi all --

Hope you all had a great holiday too and that re-entry wasn't too painful. Really appreciate you following up with this list Shelby, it's very helpful. Here's some of the follow up:

- How does Quick Add create matches when a user signs up with an email rather than a phone number? What does this experience look like if the user who signed up with an email doesn't have any contacts?

User verification for both methods (i.e., email and phone number) utilizes the same algorithms for generating matches. However, the newly registered user's discoverability will be limited from other users (who most likely would have the phone number instead of the email address stored in their contacts). This is the same for a user who signed up with a phone number and had no contacts.

- When the updates to Quick Add roll out, will there be a way to tell if the user being suggested as a friend is an adult or a minor? If so, what will that differentiation look like?

We always iterate on our QA algorithms to improve recommendation quality and safety. Our QA algorithms do not utilize any age-related feature. As such, their output cannot leak the age of the recommendations. Also, worth noting that the updates we mention have fully rolled out.

- We know you've made it impossible for a minor account to change their birthdate to over 18 but we wondered if an adult user can change their birthday to appear under 18?

At this stage, the product has not changed for 18+, so technically, yes. But we took your point on this in the meeting and will be following up internally.

- Policy changes on SnapKit that address concerns about anonymous messaging apps like LMK, YOLO, and SendIt. (We know that this is further in the future and will be under an embargo, just noting it here for future reference.) **Yes -- noted. We will be in touch as this gets closer.**

I'm working on the content guidelines for you separately and will circle back on that point. But wanted to follow up on the rest before the weekend.

Let us know any additional q's -- and happy Friday.

Rachel

On Mon, Nov 29, 2021 at 9:02 AM Shelby Knox [REDACTED] wrote:
Hi folks,

I hope everyone had a fantastic holiday! Rachel and Jacqueline, I wanted to thank you again for meeting with us before the break. Super excited to hear about some of the changes Snap is rolling out. I wanted to drop in what you're following up with us on based on our notes -- let me know if I've missed or misrepresented anything.

- How does Quick Add create matches when a user signs up with an email rather than a phone number? What does this experience look like if the user who signed up with an email doesn't have any contacts?
- When the updates to Quick Add roll out, will there be a way to tell if the user being suggested as a friend is an adult or a minor? If so, what will that differentiation look like?
- We know you've made it impossible for a minor account to change their birthdate to over 18 but we wondered if an adult user can change their birthday to appear under 18?
- Policy changes on SnapKit that address concerns about anonymous messaging apps like LMK, YOLO, and SendIt. (We know that this is further in the future and will be under an embargo, just noting it here for future reference.)

Thanks so much! Hope you have a great post holiday Monday!

Shelby

On Tue, Nov 16, 2021 at 9:19 AM Rachel Racusen [REDACTED] wrote:
Thanks so much!

On Tue, Nov 16, 2021 at 10:18 AM Amanda Kloer [REDACTED] wrote:
No worries! Moved!

On Tue, Nov 16, 2021 at 9:40 AM Rachel Racusen [REDACTED] wrote:
Sorry, one additional request -- is it possible to shift the meeting to start at 2 pm ET?

Apologies, I thought that time worked for everyone on our end!

On Tue, Nov 16, 2021 at 8:38 AM Amanda Kloer [REDACTED] wrote:
Thanks, invite sent! Let me know if that doesn't work for some reason.

Would also love to add to the agenda if possible a few questions about SendIt, which came up at the end of last week.

Thanks!
Amanda

On Mon, Nov 15, 2021 at 5:07 PM Rachel Racusen [REDACTED] wrote:
Thanks so much -- how about 1:30 pm ET on Friday?

On Mon, Nov 15, 2021 at 9:29 AM Amanda Kloer [REDACTED] wrote:
Circling back here with some times that would work for us this week if any of these work for you:

Tomorrow 11/16: 12-2 EST
Wednesday 11/17: 1-3 EST
Thursday 11/18: 1-2:30 EST
Friday 11/19: 1-3 EST

I'm out the week of Thanksgiving (and I'm sure you all are busy that week too), so if none of those work, let me know and we can look at the week of 11/29.

Thanks!
Amanda

On Fri, Nov 12, 2021 at 2:02 PM Amanda Kloer [REDACTED] wrote:
Thanks Rachel! And great to meet you, Nona and Jacqueline. Shelby Knox, who just joined our team as well, is CCed and I'd love to invite her too.

We're aligning schedules on our end and I'll get back to you with some good times next week if that's ok.

Have a good weekend,
Amanda

On Thu, Nov 11, 2021 at 5:47 AM Rachel Racusen [REDACTED] wrote:
Amanda —

Thank you so much for reaching out about this -- we really appreciate it. The issues you found are very much things we have been concerned about and working on fixes for -- in some cases, we have improvements that just went into effect and in some (such as on the content side), we are in the process of developing those fixes, so a conversation with all of you would be helpful on many fronts.

I'd love to have Jacqueline Beauchere, our Global Head of Platform Safety (who just us in Sept after a long tenure at Microsoft leaving their safety efforts) and Nona Farahik, who leads our content policy work, join us. Would you and Dalia be able to send over some upcoming windows that work for a call, and we can get it on the books?

Looking forward to it,
Rachel

On Wed, Nov 10, 2021 at 2:06 PM Amanda Kloer <[REDACTED]> wrote:
Hi Jennifer and Rachel,

I hope you're both doing well. I wanted to reach out to see if we could connect about some features on kids' Snapchat accounts that seem to allow and even encourage them to connect with strangers - something that significantly increases the danger of child sexual abuse via the platform.

One of our parent researchers flagged a few recent examples of sexual predators using Snapchat features to find and groom kids for sexual abuse.

- A Texas man was [arrested last month for using Snapchat](#) to meet and groom teen girls who he sexually assaulted.
- In September, a UK man was [arrested for using Snapmaps](#) to find and track young girls who he threatened, extorted for CSAM, and sexually assaulted.
- A man in Detroit [was arrested in May](#) for assaulting two 14-year-olds he had met using Snapchat's Quick Add function. He reportedly would use Quick Add to find potential friends and ask their age - if they were under 16, he would lie about his own age.

Some of the folks on our team wanted to learn more about these features and how they work, so we made Snapchat accounts as 14-year-old kids. We were surprised to see the following, which appeared to be default settings for new child accounts. I've attached screenshots, if they are helpful.

- In the initial setup, if we skipped the option of connecting Snapchat to our contact list, the list of people Snapchat suggested we add were total strangers (*Screenshot 1*). When we tried to skip

adding the strangers, we got a pop up that said "Snapchat is more fun with friends, are you sure you want to skip this step?" (*Screenshot 2*). Is this a default feature on kids' accounts?

- Once we did connect to our contacts, we got access to the "Quick Add" feature, which showed both friends from our contact list and what appeared to be either their friends or strangers (*Screenshot 3*). It was in many cases impossible to tell who was someone we knew with an unfamiliar screen name and who was a stranger.
- When we navigated to the map, we were prompted to enable location (*Screenshot 4*).
- When we navigated to recommended stories, the first several recommendations seemed overtly sexual in nature -- almost to the exclusion of any other content. (*Screenshots 5-6*)

While these features may be fine for adults, actively connecting kids with strangers, pressuring them to connect with strangers, and pressuring them to let strangers see their location is downright dangerous.

Since we had such a great chat last time, we wanted to reach out directly about these concerns. We would love the chance to sit down and talk about these features in particular, as well as the default recommended content for kids. Thanks in advance for your thoughtful consideration of these concerns.

Amanda

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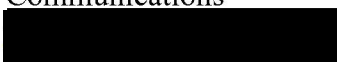
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Rachel Racusen
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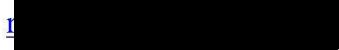

Snap Inc. 

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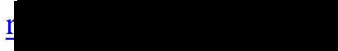

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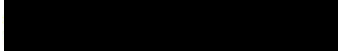
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