

AMENDED Exhibit 968

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



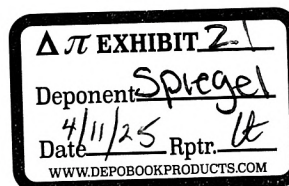
To: Snap Inc.
From: Breakwater Strategy
Re: Parent Perceptions Research – Qualitative Insights
Date: July 28, 2023

Overview: This memo outlines initial insights from qualitative research designed to explore parents' opinions associated with Snapchat, and develops hypotheses that point to opportunities for the company to meaningfully improve parents' perceptions of the platform. The findings presented here are based on twelve focus group sessions with U.S. and U.K. Parents of Teen Snapchatters, and Parents of Teens Not Allowed on Snapchat. In addition to providing nuance and texture surrounding key topics, we use insights generated from these focus groups to inform a set of hypotheses that we will evaluate and test in the next phase of research: a quantitative survey of the same audiences.

As a preface, it is important to note that the focus groups did not uncover any perfect solutions or silver bullets. There were some actions that received more positive feedback than others, but nothing we tested, or that parents suggested themselves, fully addressed their concerns or worries. For many parents, these actions were viewed as a step in the right direction and for some subset of parents, could meaningfully improve perceptions of the platform. One of the key goals of the survey will be a segmentation analysis of parents to identify which types of parents are most moveable and valuable to target through specific actions.

Key Initial Findings:

1. When asked a broad question about where parents need to set "guidelines or parameters" for their children, nearly every parent mentioned digital technology in general, and social media in particular. Managing teens' use of technology and online platforms is more top-of-mind than concerns surrounding drug and alcohol use, sex and teen pregnancy, violence, and education, but fundamental to the modern parenting experience.
2. Parents of older and younger teens generally cited similar concerns about their teens' use of digital technology and social media, emphasizing screen addiction, mental health, bullying, and exposure to inappropriate content.
 - o Parents of older teens were more apt to mention the challenge of finding balance in allowing their teens' independence while setting boundaries, as well as concerns related to their teens' mental health as they navigate issues of *social comparison, relationships with friends, and bullying*.
 - o Parents of younger teens, while grappling with these same issues, more often voice concerns related to the *consumption of content* inappropriate for their children's age.



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3. Parents predominantly gather information informally through word-of-mouth with friends, other parents, and family regarding setting internet and social media guidelines. Some incidentally find information on online platforms they use, while others receive resources from private schools, and a few encounter it in less parent-focused traditional media outlets.
4. When discussing online platforms and apps, parents often cited frustration and worry with a lack of visibility into their teens' interactions and activities.
 - Already hampered by a lack of time and energy to supervise their teens' behavior, some parents concede that their children's understanding of technology outpaces their own and that teens would be able to circumvent protective tools or controls put in place for their safety.
 - This view was especially common among Parents of Older Teens, many of whom expressed needing to balance parental oversight with allowing their children to make their own choices and develop a sense of individuality.
5. Beyond parental concerns that were common across all social media platforms, Core Snapchat features – specifically ephemerality, location sharing, and streaks – are directly connected to specific concerns that parents have related to bullying, inappropriate contact with either peers or strangers, and mental health.
 - Most commonly, parents' concerns about Snapchat's most prominent features focused on the enabling of cyberbullying, contact from strangers, or inappropriate behavior such as the sending or receiving of sexual or explicit messages, images, or videos.
 - Secondly, parents worried about Snapchat's algorithmic display of age-inappropriate content, as well as the sheer amount of time their teens spend on the app.
 - Concerns related to drugs or sextortion were raised relatively infrequently.
6. Parents expressed a range of views on potential actions Snap might take to help make the platform safer for teens, differing on their preference for tools that would help them as parents to monitor or control their teen's on-platform experience, as opposed to actions Snap could take to police the platform.
 - Broadly, there was general agreement among parents that tangible product changes – such as parental controls, an enhanced reporting system, more rigorous age verification, and changes to ephemeral messaging – would be needed for them to feel more comfortable with their teens using Snapchat, rather than educational efforts and partnerships/work with health and safety experts.
 - Parents of older teens (particularly those allowed on Snapchat) preferred that Snapchat take more supervisory responsibility over teens' activities on the platform while parents of younger teens (particularly those not allowed on Snapchat) were more inclined to want tools offering parents more control over customizable aspects of their teens' experience on the app.



7. While nearly all parents expressed positive sentiment and enthusiasm for actions Snap plans to take in the Fall, broad tiers of suggested priority and perceived impact emerged among them.
 - Implementing pop-up safety warnings, a more age-appropriate content experience, and a new strike system for inappropriate accounts resonated strongly with most participants as the most tangible, and therefore the most impactful.
 - A second tier of actions – including safer messaging and search, and stronger friending thresholds – also received significant positive feedback but were called out slightly less frequently than the others and invited more questions surrounding operationalization.
 - Lastly, raising awareness and education of Snapchatters received modest feedback, as parents expressed skepticism about teens’ willingness to engage with associated content.

Hypotheses to Test in Upcoming Survey:

1. Across issues and topics where parents set guidelines for their teens, use of digital technology, the internet, and social media are more top-of-mind than more traditional concerns like drug and alcohol use, sex and teen pregnancy, violence, and academic performance.
2. Parents receive information about online platforms like Snapchat through a variety of sources, and this is often informal or incidental, rather than proactive searching. Word-of-mouth sharing with friends and family is the most common way parents gather information and develop their views about platforms.
3. Snapchat is viewed less favorably and as less trustworthy than other tech companies generally, and other online social platforms. This sentiment is driven by parents’ concerns about mental health, bullying, content consumption, and inappropriate or predatory behavior mapping to certain features of the app, including ephemeral messaging, location sharing, streaks, and the Discover content feed.
4. Among actions Snap could take to make Snapchat a safer place for teens, parents of younger teens are more likely to prefer the expansion of tools within Family Center, which would help them monitor and customize the on-platform experience, while parents of older teens are more interested in actions Snap could take to proactively police the platform.

Detailed Findings:

Parents navigate a host of challenges in raising teens and deciding where and how they set guidelines or parameters for their children, but chief among them is managing their teens' use of technology and online platforms, specifically social media.

- Teens' exposure to and excessive attention dedicated towards screens and online platforms are top-of-mind for parents when asked about issues and aspects of parenting they are currently navigating.
- Other areas of their teens' lives that parents create and establish guidelines for, such as their education, extracurricular activities, and social lives, are intrinsically and increasingly dependent on technology, making parents' management of their teens' use of the internet and social media core to modern parenting itself.
 - Parents of older teens in particular cite difficulty with striking a balance between allowing their almost-adult children more independence and placing boundaries on their activities, especially in the context of technology.
 - Parents of younger teens tend to focus more on their children's dependence on screens and not "living in the real world" or growing up "normally."

Regardless of their teens' ages or genders, parents' concerns about their teens' use of digital technology and social media are similar, describing worries beyond screen addiction, such as their teens' mental health, vulnerability to bullying, and exposure to and consumption of inappropriate content, among others.

- Parents express a general mistrust of and distaste for technology companies broadly, and either imply or explicitly state that the platforms their teens use encourage or enable these harms.
- Although similar challenges were broadly mentioned across the board, teens' age influenced how parents framed these concerns:
 - When discussing online platforms' effect on their teens' mental health, parents of older teens tended to mention issues of social comparison, FOMO (fear of missing out), and bullying, as well as the appropriateness of interactions between friends and others in their teens' social circles.
 - Parents of younger teens were more likely to bring up screen addiction, as well as concerns about their children being exposed to and consuming content inappropriate for their age.

There is no predominant or definitive source of information about online platforms for parents. Many share different experiences about gathering information from several different sources to inform their views and ultimately set guidelines for their teens.

- Most parents get information and perspectives on how to set guidelines about the internet and social media platforms through informal sources, such as word-of-mouth conversations with friends, parents of their teens' friends, and family.

- Other parents get information from accounts on the online platforms they use, but they are not going to these sources for information proactively.
 - Some parents see information about parenting best practices or experiences from accounts on TikTok or Instagram, including people who might be parents, school teachers, or experts.
 - Several parents mentioned seeing conversations about parenting decisions in local Facebook groups (example: Moms of Westchester County).
- Some parents recalled school-provided resources, which seem more common for private schools than public schools.
 - A few parents said their teens took a media literacy program at school, which included information on social media.
 - Other parents have access to experts like school counselors or therapists where they can ask questions about online behavior and learn best practices.
 - A couple of parents also recalled discussions in PTA meetings about online platforms.
- A handful of parents mentioned they read or see information about these topics in more traditional media outlets, which are less parent-focused, such as NPR or Real Simple Magazine.

Parents of older and younger teens often worry that they do not have enough visibility into or ability to monitor their teens' online interactions or activities.

- Many parents, particularly those of older teens, cite a baseline lack of bandwidth to consistently supervise their teens' behavior, and are resigned to the idea that they must trust their teens to behave and use online platforms appropriately regardless of supervision.
- Parents of younger teens are still focused on protecting and shielding their teens from potential harms online and still yearn for more control and oversight of their children's online activities and platform use.
- However, there is a general anxiety, frustration, and worry across parents that even if their teens were more thoroughly supervised, they would be able to find ways around any monitoring or controls due to more advanced understanding of the technology.

Parents of teens, regardless of age and use of the platform, identified Snapchat as an app that they were particularly concerned about their teens using. While parents of teen Snapchatters were generally more familiar with the platform, nearly all parents tied specific concerns they had to core features of Snapchat.

- Concerns related to bullying, inappropriate contact with either peers or strangers, and mental health often arise from parents' general awareness of Snapchat's core features such as ephemerality, location sharing, and streaks.
- Ephemeral messaging is what parents most strongly associate Snapchat with, and in turn, this feature creates the most concern for them.

- Ephemerality exacerbates parents' worries about their inability to properly supervise their teens' communication with friends, or even strangers.
- Parents also believe this aspect of Snapchat encourages their teens to behave without regard for possible consequences, and enables cyberbullying, contact from strangers, or inappropriate behavior such as the sending or receiving of sexual or explicit messages, images, or videos.
- While somewhat more rare, a few parents raised concerns about ephemeral messaging making Snapchat an easier platform on which to conduct the purchase and sale of illegal drugs. Topical concerns about drugs and sextortion were quite rare and infrequent.
- Some parents are also aware of the Snap Map feature, and worry about the implications of location sharing among minors.
 - First and foremost, parents' concerns surrounding location sharing involve their teens' physical safety, and exposing their whereabouts to bad actors either within or outside of their social circle.
 - Secondly, parents cited anecdotal experience of their teens seeing that their friends were gathering together without them and feeling upset or experiencing FOMO (fear of missing out).
- While not raised with the same level of concern as "disappearing messages" and Snap Map, Snap Streaks are also mentioned as a feature that compounds parents' displeasure with their teens using the app.
 - Snap Streaks are viewed as furthering the already strong grasp that technology broadly, and Snapchat specifically, has on their teen's attention and focus.
 - Parents often mention their teens' seemingly uncontrollable need to "keep their streaks alive," associating the practice with ceaseless online communication and screen addiction.
- Lastly, parents of younger teens in particular connected Snapchat's Discover content with their teens' exposure to and consumption of age-inappropriate and often oversexualized content.
 - Snapchat's content algorithms were a point of frustration and confusion for parents, who openly wondered why the platform was displaying inappropriate content without guardrails or age-specific restrictions or protections.

There was broad consensus among parents that Snap needs to implement significant product changes to Snapchat to make the platform safer for teens and improve parents' perceptions.

- Parental control tools and an enhanced reporting system to manage concerns or monitor suspicious activities were among the more popular potential actions Snap could take to give parents increased supervisory agency in their teens' activities.
- More rigorous age verification and retaining messages on Snapchat's servers were popular potential actions that most parents wished Snapchat would have already implemented, though many acknowledged operational loopholes and difficulties associated with putting them in place.



- Some parents cited concerns about information privacy that might arise with stricter age verification practices, such as uploading images of their children's birth certificates or other such documentation.
- While most parents called for ephemeral messaging to be mitigated or outright removed, they conceded the benefits of more feasible actions, like retaining messages on Snapchat's servers for longer periods of time and integrating this feature as a part of the enhanced reporting system.
 - However, parents who felt comfortable with this compromise cited that a 30 day window would likely be insufficient, as it might take a longer period of time for many teens to feel comfortable sharing inappropriate or harmful behavior and, therefore, for parents to report it.
- Other potential actions such as content and algorithm transparency, as mental health support and expert collaboration, were received with lukewarm enthusiasm, as parents grappled with questions of logistics and tangible impact.

When evaluating potential actions by Snap, parents differed on their desired level of control over their teens' activities and their desire for Snapchat to take greater responsibility for the safety of their users.

- Parents of older teens often lamented their dwindling level of control and oversight over their teens' activities as they aged. As such, they showed a preference for more proactive actions from Snapchat, such as stronger friending thresholds and age verification, to give them more peace of mind.
- Conversely, parents of younger teens still feel relatively in control of their teens' activities, and thus welcome more parental tools, such as Family Center, that would give them greater agency in managing their teens' online experiences.

Parents reacted positively to the set of actions Snap plans to take in the Fall, but as with other potential actions, preferred those they perceived as having a tangible impact on their teens' experience with the app, rather than those with more significant operational hurdles or those that required intentional use.

- Implementing pop-up safety warnings, a more age-appropriate content experience, and a new strike system for inappropriate accounts resonated strongly with most participants as the most tangible immediate solutions, and therefore the most impactful.
- A second tier of actions – including safer messaging and search, and stronger friending thresholds – also received significant positive feedback but were called out slightly less frequently than the others and invited more questions surrounding operationalization.
 - Some parents noted that teens might be able to circumvent features designed to ensure connections with "mutual friends."
 - Similar concerns arose with safer messaging, and parents found aspects of how to make search "safer" somewhat vague.

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- Lastly, raising awareness and education of Snapchatters received modest feedback, as parents expressed skepticism about teens' willingness to engage with associated content.



Select Open End Responses:

"I just feel like [teens are] the worst version of themselves with cell phones. [My son] has TikTok. He doesn't do Facebook. He wants Snapchat. I'm not allowing it yet cause it gets me very nervous that it can be erased if he posts something."

- Parent of 15-year-old male teen not allowed on Snapchat

"...It would be a full-time job for me to take my daughter's phone and constantly make sure that things that are going on there are all good. Because it's just impossible to do... It's not like when they were nine years old and I was able to kind of see what they were doing on their computers. Now it's the phones and these apps that are hard to get into and see, and things disappear..."

- Parent of 15-year-old female Snapchatter and 17-year-old male Snapchatter

"When Snapchat first came out, I never used it but my daughter and my wife had a blast with it. I thought that's what it was all about, making silly faces... Go make silly faces with your friends, I don't care. But then I learned about the kind of people that were on it, what they were doing, the disappearing photos, what they were sending. And that's when I became troubled by it."

- Parent of 13-year-old female teen not allowed on Snapchat

"Create an app where you don't need [potential actions]. Take the stuff away that's causing those problems. Don't give us things to deal with once the problem's been caused, you know? If you feel that you need to have mental health support, then there's something wrong with the app."

- Parent of 15-year-old male teen not allowed on Snapchat

"I think for me, the parent controls, the age verification, and the retaining disappearing messages, they're controls, they're fixed, they're there, they exist. Everything else, you've got to access. You've got to go and look and find it, and it's not controlled. It's something to help you... I think the problem is in the internet. The internet is brilliant for information sharing... But what it's awful for is that all this stuff is out there, and nobody, no government or agency, or anything like that has any control over it."

- Parent of 14-year-old male teen not allowed on Snapchat

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DOCUMENT SLIPSHEET

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ENDATTACH: SNAP0019102

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