

AMENDED Exhibit 974

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

Safety | Security | Privacy

November 7, 2012

Snapchat



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Outline

- Product Assessment
- Support Operations
- Law Enforcement Relations
- Public Affairs

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Goals

- Position Snapchat as a leader in Internet safety
- Create a positive and defensible story about Snapchat and Internet safety, security and privacy
- Establish Snapchat as “friend” of NGOs and government
- Create a consistent, verifiable and persistent safety, security and privacy backbone to Snapchat
 - Front End Changes
 - Back End Changes

The Review Process

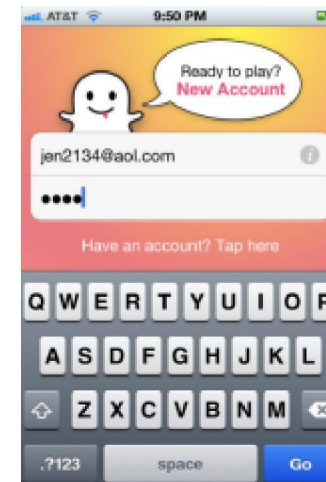
- Created various accounts
- Navigated the site as typical users
- Determined potential areas of concern in safety, security and privacy
- Met with Snapchat staff
 - Reviewed programs, policies, and processes

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Technology: Front End Changes

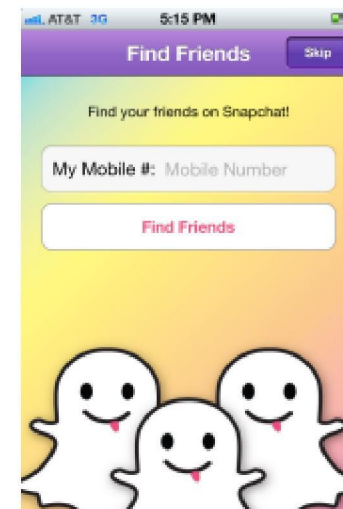
- Account Creation
 - Confirmations
 - Require email address confirmation
 - Require phone number confirmation
 - Incentivize users to enter correct email addresses and phone numbers by reminding them that if they lose their passwords these are the only methods of verification



Technology: Front End Changes

- Privacy Settings

- Allow users to only accept Snapchats by friends they approve
- Allow users to keep their mobile number unsearchable on Snapchat so nobody can add or find them
- Show user how to access and change account settings during account creation
- “Find Friends”: Allow users to require someone to provide an additional piece of information, other than only username, in order to be their friend- such as phone number, email address, or location

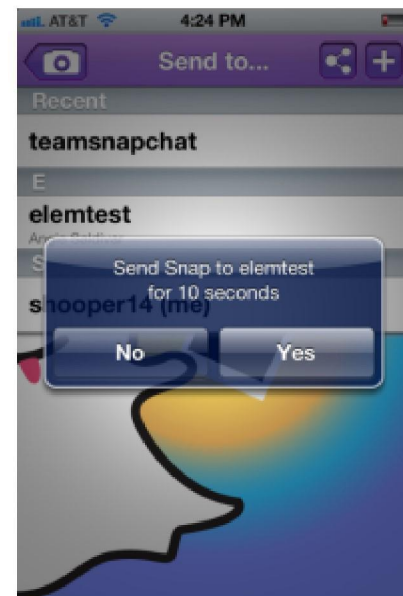


Technology: Front End Changes

- Report Abuse
 - Allow users to report other users for TOU violations or harassment
 - After a certain number of reports, warn the user that they are in danger of losing their Snapchat account due to harassment and TOU violations
 - Allow users to report users to NCMEC for child exploitation
- Support Operations
 - Add ability for user to easily contact Snapchat if a phone number has been linked incorrectly (directly from the screen that informs the user that the number has already been linked)

Technology: Front End Changes

- Safety Pop-Ups: Integrate short safety tips into messaging and pop-ups users already receive during normal use of Snapchat
 - Provide users with safety tips on sending and receiving Snapchats
 - Remind users that Snapchat recipients have the ability to take screenshots of photos that are sent to them
 - Tell users that if they receive harassing or inappropriate Snapchats to take a screen shot and make note of the user name for use by law enforcement
 - Tell users they can find more information by going to www.Snapchat.com and clicking on the safety tab at the bottom of the page



Technology: Front End Changes

- Safety Pages: Add a safety section to www.Snapchat.com and include the following:
 - Blocking Users
 - Making Friends
 - Sending and Receiving Snapchats
 - Deleting an Account
 - Reporting to Law Enforcement
 - Reporting to NCMEC
 - Parents (insert Parent Safety guide)
 - Schools (insert Schools Safety guide)
 - Law Enforcement

Support Operations

- Integrate use of prioritization based email response system to user complaints/issues
- Prioritization recommendations:
 - Law Enforcement
 - Parental Concerns
 - Log-In Issues
 - User Name change requests
- Allow users to report issues to support operations on the website
- Additional documentation to be provided including email responses to:
 - Parent Inquiries
 - “Hacked” Accounts
 - Password Resets
 - Account Verifications Issues: responses for how to handle users who don’t have account connected to a phone number or provided the wrong email address

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Support Operations

- Create short overview/guide for use when support operations is expanded
- Create official warn/delete/ban policy for users who are regularly reported for harassment or TOU violations
- Provide training for Law Enforcement related topics (to be provided by SSP Blue)

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Conflict for Discussion

- The Terms of Use found on www.snapchat.com (last updated on June 26, 2011) does not include any sort of reference to the application being appropriate for a specific age group.
- The Apple App Store has the Snapchat application rated as 12+.
- This discrepancy needs to be addressed.

Education and Partnerships

- Educate user base on SSP best practices
- Partner with experts
 - PTA
 - NCMEC
 - NetSmartz
 - Connect Safely
 - American Library Association
 - IKeepSafe
 - Enough is Enough



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Law Enforcement



- Establish positive relationship with Law Enforcement
- Create [REDACTED] email address for use by Law Enforcement
- Circulate Law Enforcement guide as needed (document to be provided)
- Identify Law Enforcement outreach opportunities
- Highlight Law Enforcement success stories to media
 - Reach out to Law Enforcement to determine outcome of issues

Public Affairs

- Press Audit
 - Findings
 - Next steps
- Documents/Training to be provided
 - Backgrounder
 - Crisis Points and related Talking Points
 - Leadership Strategy Framework
 - Executive Spokesperson Training

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Thank you



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