

AMENDED Exhibit 978

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: Jacqueline Beauchere [REDACTED]
Sent: 2/12/2024 10:21:12 AM
To: Rachel Racusen [REDACTED]
CC: [REDACTED] Rachel Hochhauser
Subject: Re: PTA + Snap potential engagement

Hi, all. Apologies for the delay, and a few thoughts ...

As to [REDACTED] question about previous engagement, ISTE connected us with PTA's last manager of Programs & Partnerships, Shiney Sharma. This was in the spring of 2022 (during our feedback sessions on Family Center) and, according to LI, she left the NPTA in July of that year.

I know from my MSFT experience that working with them is (was?) very pricey. MSFT supported NPTA to the tune of more than \$1M+ annually and, frankly, the ROI was questionable. (Now, maybe they're not supporting?)

We, Platform Safety/Policy, do not have anywhere near that level of funds for such a partnership, so if we were to engage, it would need to be managed by others. Moreover, I think we should consider signature partnerships more strategically. That said, if there are some light-weight, educational efforts to spearhead, that seems a valuable way to test the waters and advance our more immediate objectives with parents and educators.

Thanks for following up, [REDACTED]

Bests,
JB

On Fri, Feb 9, 2024 at 11:52 AM Rachel Racusen [REDACTED] wrote:
This is really great, thanks so much you two. [REDACTED] very supportive of you going to the March 7th event.

Rachel Racusen
Communications
[REDACTED]
[REDACTED]

On Fri, Feb 9, 2024 at 11:52 AM [REDACTED] wrote:
Thanks, [REDACTED]. This was a very productive meeting, and the PTA presents some unique opportunities that I think could be worthwhile. They also are working to invite us to the March 7th session (its a few blocks from my house, so happy to handle it if helpful), so we can get a better idea of how they approach their work.

Two points to lift up from [REDACTED] note.

1) The costs here are pretty high, but the reach is also significant. Its pretty scalable, so I think we can tailor the investments at different levels, but even the low end will be a big cost (in the 250k range on the low end)

2) A number of the big deliverables will be in 2025, so this is really laying the groundwork for next year. I think this couples well with our existing partnership with Safe and Sound Schools this year, but I think its worth noting this is a longer term effort.

Looking forward to discussing this more and thinking through whether this is a good option for us.

■e

On Fri, Feb 9, 2024 at 12:32 PM ■■■■■ wrote:

Hi all - following up on the conversation ■■■■■ and I had with Kris from the national PTA. Generally speaking, there seems to be alignment on working together to provide resources to parents (either via scaled national outreach or more locally/more high-touch), though the scope will be dependent on our budgets ■■■■■ please chime in if I missed anything below! Thanks,

Action items:

- **Kris (PTA) is going to see if she can reserve a spot for ■■■■■ at a March 7th PTA-led event in DC** convening their corporate sponsors, related stakeholders, PTA chapter leadership to discuss PTA's strategy moving ahead on mental health/digital life
- **■■■■■ will incorporate potential ways to engage with PTA during upcoming parent engagement discussions in the next week** and will follow-up with Kris accordingly
 - See more detailed notes below, but if we wanted to create a co-branded toolkit with them, we can provide core content + then they take it to "PTAify" it / create final toolkit version. We should see how we can merge with Safe and Sound toolkit development so we don't duplicate efforts [@Rachel Hochhauser](#)
- Because of their March 7th event, they won't invite guests to our NYC March 6th event, but are open to inviting guests for future, similar efforts ■■■■■ ■■■■■

Notes:

- Digital safety/well-being has risen to the top of their priorities/national conversation
- Given that, she thinks PTA/Snap should work together ("it's just bananas to me that we aren't collaborating with Snap on engaging and educating parents, all things considered")
- **Opportunity** she sees with Snapchat:
 - Create co-branded material/resources that PTA can reframe to "break through" and "build trust"
 - Close knowledge gap with parents and teachers; kids using it have a different experience than parents whose opinions are being shaped by what they hear on the news
 - Create opportunities for kids to share what they love about snapchat with their parents/get parents on Snapchat to understand/use/play with features
- **Grant program** - they are also running a [grant program](#) for local PTAs who apply for \$\$/resources for local projects, some of which receive support from Google and other orgs
 - Grants are typically awarded in Aug-November; and correlated events happen from January-May
- **Budgets:** From Kris - *"we have some PTA Connected funders contributing between \$250K - \$500K per year and we have a handful that contribute seven figures annually, with the highest being \$3.15M for a 1-year term currently. Every scope is bespoke, though there are some common elements (grants, co-branded joint program, etc.)... We can land on a scope that ensures PTA and Snap are each and collectively getting what we need, proportional to the budget."*

On Tue, Jan 16, 2024 at 12:30 PM ■■■■■ wrote:

Thanks, V ■■■■■ This sounds great.

We talked about the PTA, but had heard from a few folks the cost was high and the juice wasn't really worth the squeeze. Happy for that to be disproven, though.

Maybe we can set up a call later this week to talk through the options.

Policy Communications | Snap Inc.

cell:

Snapchat:

On Tue, Jan 16, 2024 at 3:27 PM wrote:

Hi JB and - I spoke with Kris from the PTA late last week - she leads corp partnerships for them and reached out after attending the panel I spoke on at last year's FOSI's conference. You can see her follow-up email below, and I've included some bullet points below as well. I relayed to her our focus on engaging with parents + highlighting tools/features like Family Center, etc.

Questions for the two of you:

1. Have we considered working with PTA in the past / any helpful context of previous plans?
2. Based on below, what is your interest level in pursuing a partnership with them? You'll see this in the notes below, but calling out she emphasized she's not so worried about additional sponsorship \$\$ this year, but wants to find a way to work together with us.
 - o I think there's an opportunity to create some co-branded material with them that they can share with local chapters that won't require so much effort from our end... but depending on our interest, we could pursue higher-effort options as well

Let me know your thoughts! I'm also happy to set up additional time with her.

Thanks,

PTA conversation with Kris Prevatte

- Digital safety/well-being has risen to the top of their priorities/national conversation
- Given that, she thinks PTA/Snap should work together ("it's just bananas to me that we aren't collaborating with Snap on engaging and educating parents, all things considered")
- **Opportunity** she sees with Snapchat:
 - o Close knowledge gap with parents and teachers; kids using it have a different experience than parents whose opinions are being shaped by what they hear on the news
 - o Create opportunities for kids to share what they love about snapchat with their parents/get parents on Snapchat to understand/use/play with features
 - o Create co-branded material/resources that PTA can reframe to "break through" and "build trust"
 - o Closed door briefings (also do this w other companies like Uber): briefings that bring together state/national PTA members + tech cos as well as others to talk about safety features. This has been successful for their other tech partners.
- **Budgets:**

- There's a set of "proud national sponsors" which includes YT, Google, Uber, Discord. She's not focused on growing this, but retaining existing members
- Emphasized to me that she's not worried about yearly budgets/getting \$\$ support from us, as they are all set in that regard
- **Previous examples** with other companies:
 - Discord - created in-person programming called "[Build Up and Belong](#)"; they leverage and train local PTA groups who deliver messaging from Discord/national PTA; student + parents Q/A and panels
 - [On this page](#), they linked to a family specific section which highlights Discord safety resources, links, etc.
 - Similarity with Snap as parents are also super unfamiliar with Discord
 - TikTok - worked with them on their family center/pairing tooling; in 2019, helped them with their trust issues (and "moved the needle" on trust/sentiment among parents)
 - Meta - have done local focus groups / messaging research
- **Grant program** - they are also running a [grant program](#) for local PTAs who apply for \$\$/resources for local projects, some of which receive support from Google and other orgs
- **Resources/Material** - generally speaking, everything they create is free and available on their website; they constantly share material throughout the year to their chapters
- **Other**
 - They have an event on March 7th in DC convening their corporate sponsors, thought leaders, PTA chapters to discuss PTA's strategy moving ahead on mental health/digital life
 - Companies paying various amounts to sponsor event (floor is low 6 figures)

----- Forwarded message -----

From: **Kris Carey Prevatte** <kprevatte@pta.org>

Date: Thu, Jan 11, 2024 at 11:18 AM

Subject: RE: Kris + [REDACTED]

To: [REDACTED] [REDACTED] [REDACTED]

Hi V [REDACTED]

Glad we could connect.

Here's that Discord example:

<https://www.pta.org/home/programs/connected/build-up-and-belong>

We [awarded grants to PTAs](#) to host this program this past November and those grant-supported events are happening nationwide through the end of the school year. This is a model that works beautifully, even though it sometimes feels so "simple."

We might not be the right fit to help you grown Snap +, but we're definitely in a good spot to help you with engaging parents and educating parents at scale. We can help with sentiment probably more than any other metric, largely in creating more understanding and comfort by closing the knowledge gap between youth and their parents.

Our whole thing is positive, proactive, practical. I think that's why our tech sponsors appreciate collaborating with us on programs and education, because we don't shame parents or vilify specific platforms. IF kids are going to be allowed to use Snap, THEN parents should be fully educated about how to use all the safety tools and features as they "walk alongside" their kids with Snap.

As mentioned, we're not itching for more sponsors or more projects. We're full up.

But it's just bananas to me that we aren't collaborating with Snap on engaging and educating parents, all things considered.

Let me know what feels like a logical next step, if any.

Warmly,

Kris

Kris Carey Prevatte (she/her)

National PTA | Associate Director, Corporate Alliances

703-518-1228 Desk | 202-735-7787 Mobile

kprevatte@pta.org | www.pta.org

Heads up: PTA HQ is closed on Mon, Jan 15.

-----Original Appointment-----

From: [REDACTED]

Sent: Wednesday, December 20, 2023 2:47 PM

To: [REDACTED] Kris Carey Prevatte

Subject: Kris + [REDACTED]

When: Thursday, January 11, 2024 10:00 AM-10:30 AM America/Los_Angeles.

Where:

When
Thursday Jan 11, 2024 · 10am – 10:30am (Pacific Time - Los Angeles)

Join with Google Meet

Guests

Meeting link

meet.google.com/hay-cvwa-znh

██████████ - organizer
kprevatte@pta.org
[View all guest info](#)

Join by phone
(US) ██████████
PIN: ██████████
[More phone numbers](#)

Reply for kprevatte@pta.org

Maybe	No	Yes
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