

AMENDED Exhibit 269

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

IG Growth Update November, 2023

Unlocking new networks through school communities

TL;DR

Context Summary

OBJECTIVE

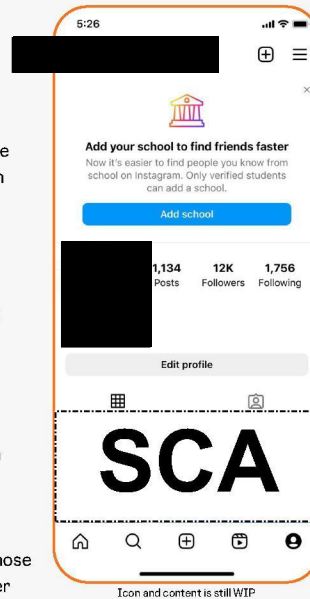
- Unlock the ability for high school and college students to discover and connect with people from school (Phase 01) and provide a safe space to be authentic and build community with schoolmates (Phase 02), to give teens a new reason to join/find more value with IG.

STRATEGY

- Allow high school and college students to add their school to their IG profile and find classmates in Suggested Users units, Discover People pages, and Search (Phase 01). Eventually, users can create school communities where classmates/friends can share and connect (via Stories, Direct messages, etc) (Phase 02).

MEASUREMENT

- [Success] Phase 01: Participation Rate, Reciprocal Follows (targeting close to other top Graph ranking features like mutual friend signals)
- [Opp Size] Phase 01: +5K-20K DM Teen DAU based on adoption from self-profile to add a school, plus downstream friending benefits.
- [Success] Phase 02: Teen Acquisition and Engagement (new users join to be part of the school buzz on IG – no existing benchmark)
- [Opp Size] Phase 02: Larger DAU-driving community features' sizing is in progress, but those will bump up adoption for a potential to drive ~150K DM Teen DAU (benchmarked on other high-value opt-in features, like Contact Import)[[link](#)].



TL;DR

Product Summary

Phase	Eng Effort	Staffing	Timeline	Goal	Measurement	What we are building	Risks
<u>PHASE 01</u> Add Your School, Find Friends	8 weeks iOS 8 weeks Android 16 weeks server	1 Android, 1 iOS, 2 Server	H124 Test	Help high school and college students find and connect with schoolmates already on IG	<ul style="list-style-type: none"> - Participation Rate - Reciprocal Follows 	<ul style="list-style-type: none"> - A collection flow from a profile QP (PO) and a permanent endpoint (TBD), which stores structured, verified data about a user's school when they choose to enter it. - A profile badge that shows to others at the same school. - SU, Search, and Discover People labels for those in your school. 	<ul style="list-style-type: none"> - PR/public perception - Privacy reviews and mitigations - Email verification step will lead to large drop-off - Strategy to verify school emails is WIP w/ third parties - ~50% of teens state their age as 18+, so many will miss out, since this will be an age-aware product - Team ownership is TBD
<i>Blocked By</i> <i>Phase 1 Results</i> <u>PHASE 02</u> School Communities (Content Sharing, Chats)	TBD	TBD	H22024+	Help students create a safe community that encourages authenticity and connection, where everyone at schools joins in	<ul style="list-style-type: none"> - Teen Acquisition - Early Friending - Teen Engagement 	<ul style="list-style-type: none"> - Create a way to share content together (ex: collaborative or exclusive Stories), chat with classmates, and connect with new friends from school 	<ul style="list-style-type: none"> - Need enough ongoing participation (adding schools, sharing) to spark a community flywheel - Group Profiles deprecated, need a similar alternative communal space

TL;DR

Discussion

ARE YOU ALIGNED WITH GROWTH INVESTING IN PHASE 01 IN H12024?

- [FYI] Right now, we only want to commit to validating Phase 01 (Phase 02 is a WIP vision).
- [RISK] We have PXFN feedback and mitigations we're working through, but it's still a risky climate for this.
- [FYI] Budget needed for school email verification, done through a potential partnership with UNiDAYS (email verification service, which is required by PXFN). Negotiations in progress.
- [FYI] Design, content, and eng have proven feasibility with several reviews and even tackled a prototype at a recent hackathon ([check it out!](#)).

Context

Why should we do it

Our current strategy of relying on power user teens to get less active friends on to IG may not be effective if **there are full communities of teens that have not yet joined IG.**

— Why US Teen DAU is declining while Session & Time are growing

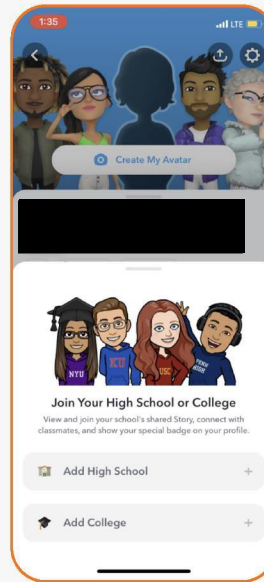
Positioning

Our competitors are exploring school communities.

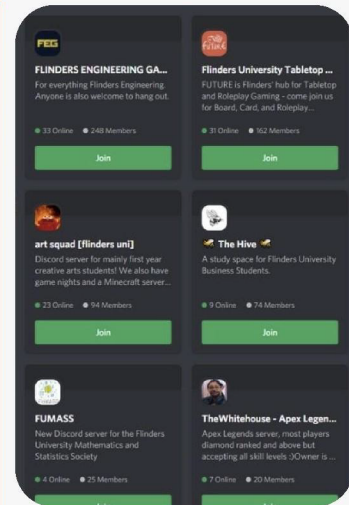
Snapchat has alluded to continued investment in communities and traction with high schools and colleges [\[link\]](#).

“We recently launched Communities, a product for private groups in which members can add friends and post to a shared Campus Story. We started with colleges and high schools and will be rolling it out to more communities over time. We’ve now onboarded 1,400 colleges in the US, and will continue expanding to more universities around the world.”

-VP of Product, Snapchat



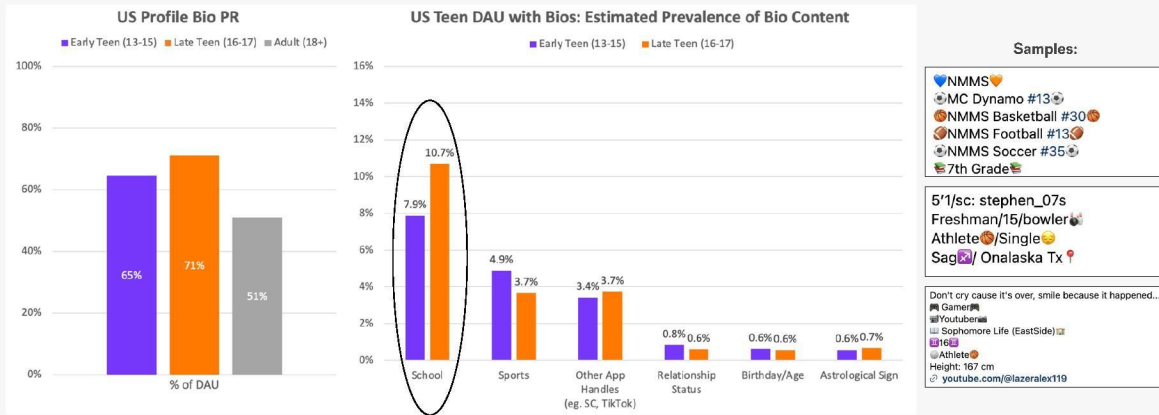
Snapchat's communities stories shares content to your high school's graduating year



Discord allows users at a school to create chat servers around freeform topics

Why should we do it

Schools are already a top attribute about themselves that teens like to display in their profile bios



Estimated using regex matching

In 2024, we need to unlock these new school communities that will kickstart network connections in two phases

Phase 01:

Add Your School to Find Friends

Unlock discovering and connecting with people from your school

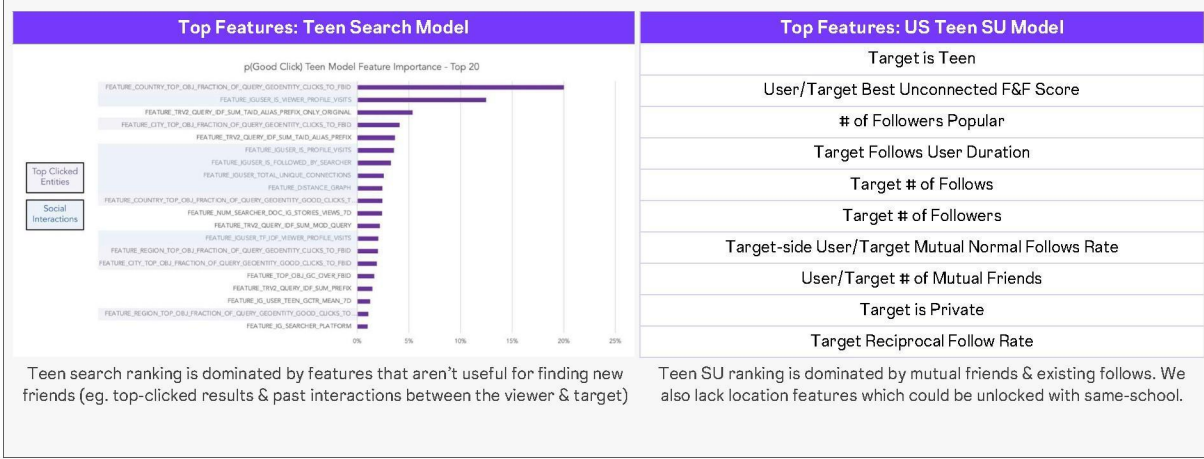
Phase 02:

Community on IG Brings More Friends

Provide a safe space to be authentic and build community with your schoolmates

Why should we do it

In Phase 01, we expect structured school data to help improve the ability to find friends and acquaintances (especially in Search and Suggested Users), which teens are hungry for (details)



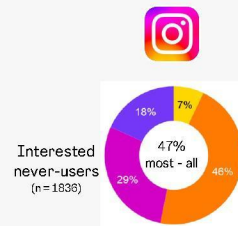
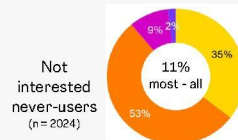
Why should we do it

Teens get an app when they hear about it from friends, but they don't think their friends on are IG. **In Phase 02, we will need to invest in virality within school communities to get teens and their friends on IG together.**

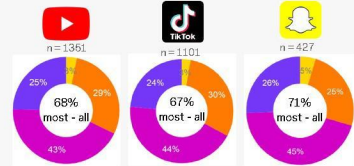
([Open Questions](#) for the Phase 02 Product)

Q: "How many of your close friends do you think use [app]?"

All Most A few None



The app teens started using most recently



TikTok (n = 1101)

67% most - all

44%

50%

24%

25%

43%

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18%

7%

48%

29%

40%

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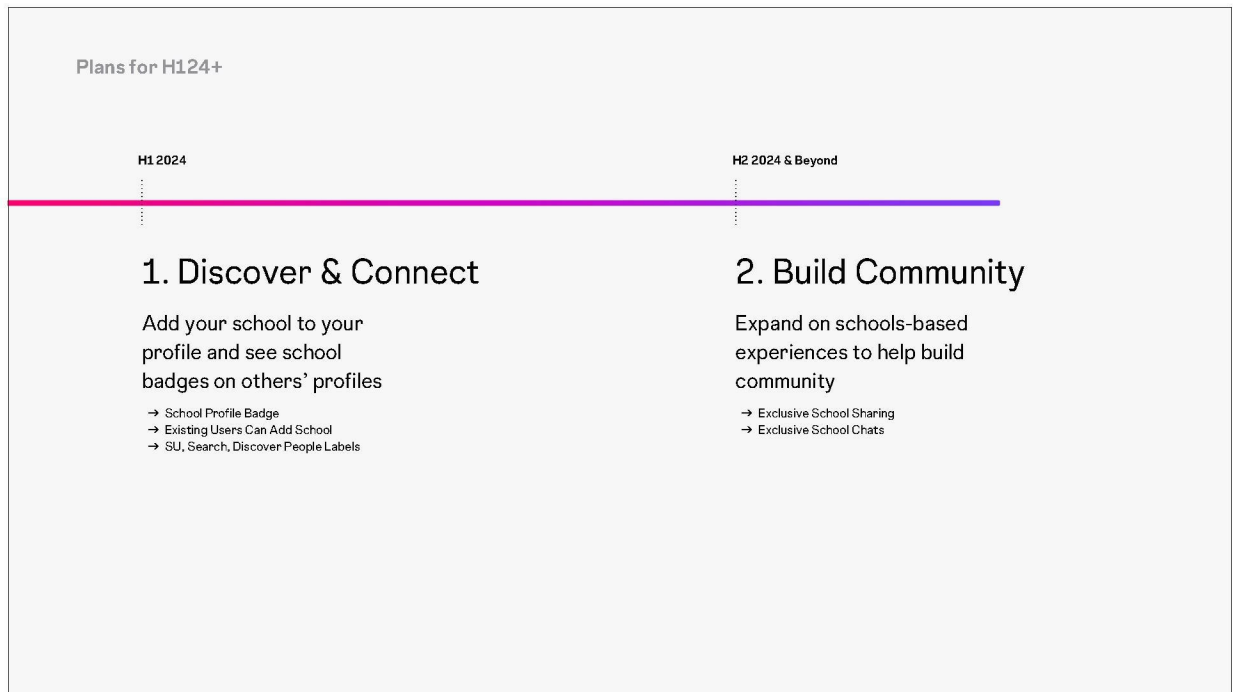
Product plan

Positioning

User problems:

- 1)** teens want to sustain or make new **connections** with classmates
- 2)** ...but they need assurance their connections are **legitimate** (i.e. others are who they claim to be)
- 3)** teens want to connect easily with looser acquaintances at school for a sense of **community**

Source: See [Building school communities for teens: insights from the past \(July 2023\)](#) for a summary of research and [Marginal Teens](#) analysis



Phase 01

H2 2023: Scoping Begins
H1 2024: Test & Validation

Phase 01

Discover & connect with people from school

Goal: Help students find and connect with schoolmates already on Instagram

Success: Participation rate for adding schools from profile and early friending will help us exit to Phase 02

Summary:

- [P0] Add school from profile
- [P0] Ability to search for school
- [P0] Email verification to obtain school label
- [P0] Add school badge to profile (can be hidden)
- [P1] See your classmates in SU, discover people, search
- [Depri] Add school during onboarding

Eng Cost: 8 weeks iOS, 8 weeks Android, 16 weeks server

