

AMENDED Exhibit 266

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

DOCUMENT SLIPSHEET

Bates Number: META3047MDL-035-00002791

Custodian: CASTANEDA_DIEGO;DOW_ALEX;META
PLATFORMS;NEWTON_KARINA;OTWAY_STEPHANIE;ROTHSCHILD_MIKI

Author: SHARED DRIVE (UNAVAILABLE)

Filename: 2021-11-29 TEEN EN COUNTRY IOS TAKE A B_1BNFLZ-
QIZ7A163N17ADGLE7DD3UW9VZEGZY1D-DBSVK.PPTX

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TNAG BEGBATES:

TNAG ENDBATES:

MAAG BEGBATES:

MAAG ENDBATES:





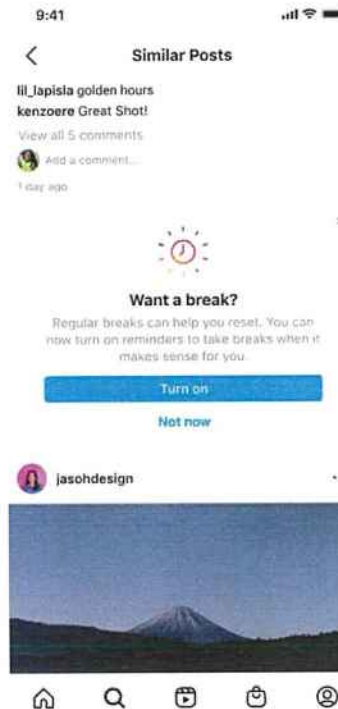
Teen EN Country iOS Take a Break Upsell Experiment Analysis -- Final Results

Instagram Mental Well-Being · Nov 29, 2021
A/c priv

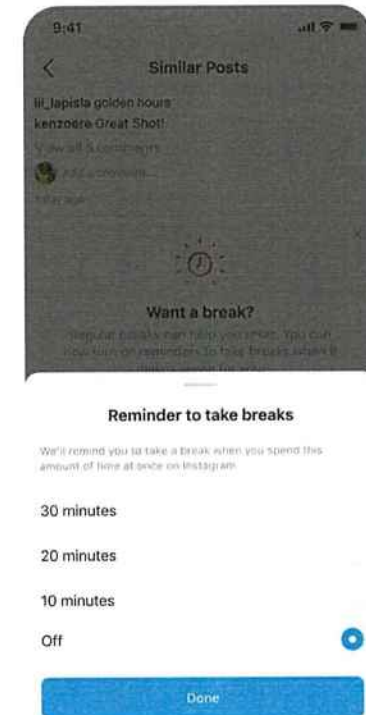
TAKE A BREAK MVP

Upsell Experience Overview

- Teens with app sessions longer than 10 or 20 minutes (the two experiment variants) are eligible for the upsell. However, the upsell can only be shown in an [eligible](#) Explore chaining surface.
- The in-line upsell will prompt them to turn on their break reminders.
- If they select “turn on”, we take them to the break reminder settings page where they have the option of setting 10, 20, or 30 minute app session duration break reminders.
- If they dismiss the upsell, we remind them that they could turn on reminders anytime and share the link to the “Your Activities” page.



Explore upsell

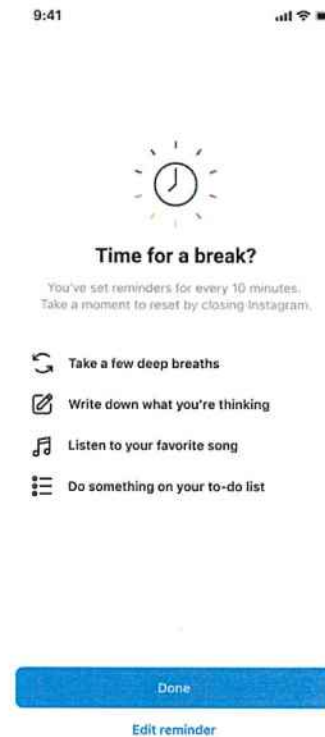


Edit break reminder

TAKE A BREAK MVP

Break Experience Overview

- If the reminders are turned on, after 10, 20, or 30 minutes of continuous use of the app, depending on the settings, we surface an immersive break reminder.
- The reminder includes tips for taking a break and a link to the break reminder settings.



Break reminder



After exiting break

Pre-Aligned Launch Criteria

As a [reminder](#), our team mission is to “*Help teens become self-aware to take control over experiences that make them feel bad about themselves, and reduce these experiences on the platform overall.*” Specifically the product impact we’re looking for here is behavioral signal for awareness and control. The launch criteria are:

1. See that we’re helping people. Our recent research with users and experts suggests that interruptions could help with pulling users out of downward emotional spirals, especially when they are unable to recognize how the content they see is making them feel or unable to mitigate NAC experiences.
2. See meaningful usage over funnel. Our benchmarks here are Nudge / upsell CTR $\geq 0.5\%$ and Nudge / upsell dismiss rate $\leq 20\%$. (Benchmarks are based on comparing with Update Following, Daisy controls, and voter registration.)
3. Balance ecosystem effects. We will disregard variants with material ecosystem regressions: Time spent: regressions $< 0.2\%$, Sessions: regressions $< 0.2\%$, Creator watch time: regressions $< 0.5\%$. The best variant prioritizes trading off big reductions in ecosystem regressions for small reductions in adoption.
4. Complements external narrative. Judgement call that the product and business workstreams for proactive public comms complement each other explainably. Caveat: Outreach teams have already talked about this product with press and policy makers, so it would be hard to walk back what's shared.

At this time, as agreed in the NAC measurement Communities [review](#), we don’t expect to use surveys or Negative Appearance Comparison-specific metrics in the launch criteria.

TL;DR

Experiment was successful and we recommend launching with the +20 min variant (vs. +10 min variant):

- Upsell Adoption: 3.9% and 3.6% for the 20 vs 10 min variant; above 0.5% benchmark*.
- Upsell Dismissal: 7.3% and 6.8% for the 20 vs 10 min variant; below 20% benchmark.
- Break Usage: 14.6% and 15.8% for the 20 vs 10 min variants.
- Ecosystem: There are no stat-sig regressions in ecosystem metrics and we have sufficient power to rule out material regressions in all IG Critical Metrics except *good user experiences* (performance metric). We recommend proceeding with the launch and monitoring this metric. We also recommend monitoring IG Revenue, which, worst case, could regress by about half of the material regression threshold (-0.07% vs the -0.20% budget).
- Projected Reach: Based on the results, we predict that 1M teens will see the upsell and ~31k will adopt Take a Break in the first month if launched with the +20 min variant.

Rationale & Considerations:

We recommend moving forward with the +20 min variant because it has similar adoption/dismissal rates to the +10 min option without a big drop in reach (8.7% vs 11.28% of eligible teens in the 6 EN countries). As we evolve the product next half, through expansion of upsell to more surfaces and opting new teens in by default, going with this more conservative option allows us to evaluate and broaden our reach further via the trigger as needed.

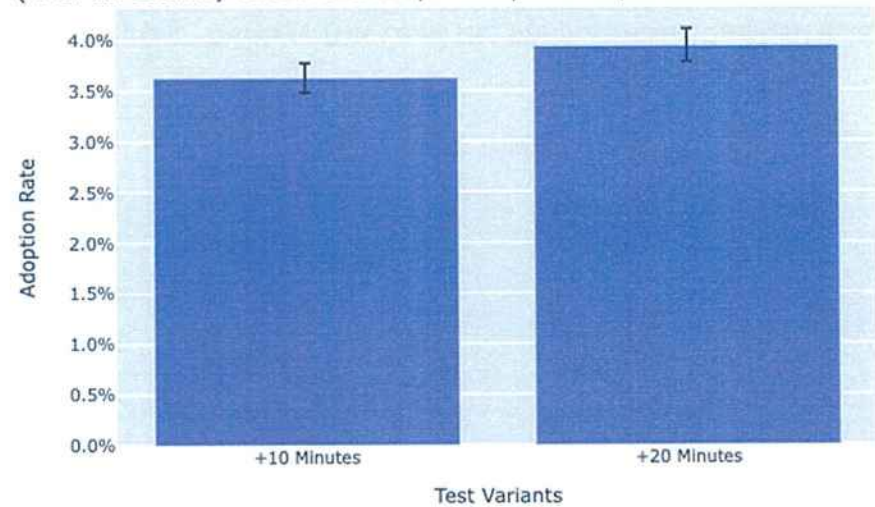
Notes:

- Upsell Adoption Rate: the percent of upsold teens that set and kept the break reminder
- Upsell Dismissal Rate: the percent of upsold teens that dismissed the upsell and never set the break reminder
- Break Usage Rate: percent of teens, after seeing the reminder, ended the session within 1 min of seeing the reminder reminder and didn't start a new session for another +10 mins
- We reviewed the following collections: FB Critical, [IG Critical](#), [IG Performance Metrics](#), [Explore Shipping Calculus](#), and [IG Sessions Commons](#)

Upsell Adoption Rate

Variants Exceed 0.5% Upsell Adoption Benchmark; +20 Min Variant Has Higher Adoption Rate (Stat-Sig)

% of Upsold Teens That Set and Kept the Break Reminder
(Teen EN Country Take a Break Upsell Experiment, 2021-11-02 to 2021-11-29)

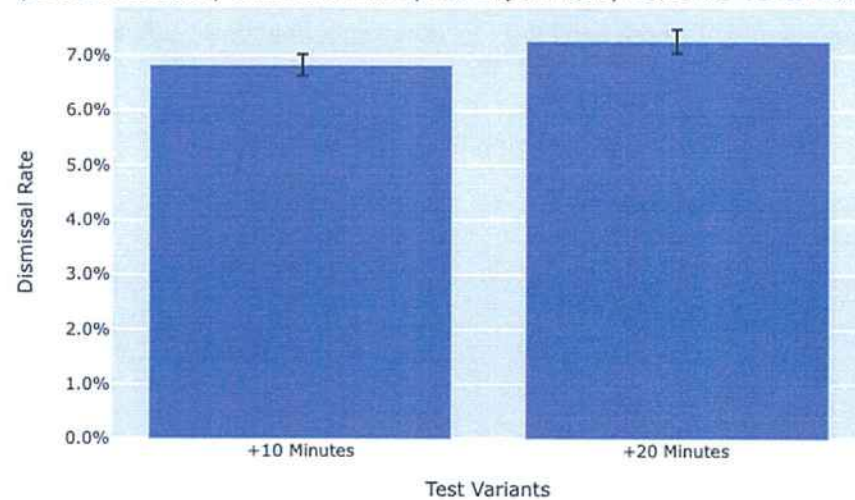


Variant	Adoption Rate Lower CI	Adoption Rate	Adoption Rate Upper CI
+10 Minutes	3.480	3.622	3.771
+20 Minutes	3.773	3.934	4.101

Upsell Dismissal Rate

Variants Remain Below 20% Upsell Dismissal Benchmark; +20 Min Variant Has Higher Dismissal Rate (Stat-Sig)

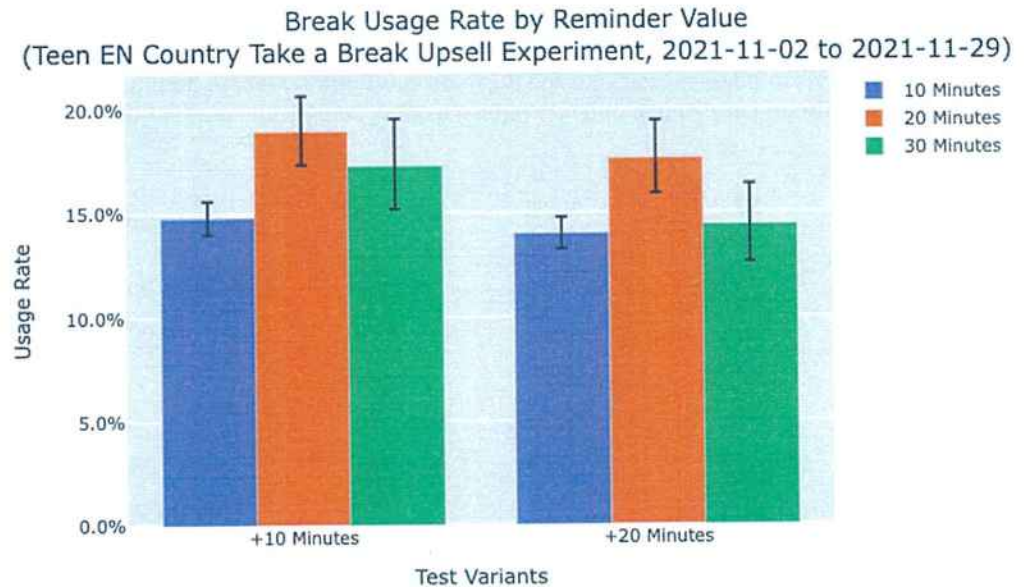
% of Upsold Teens That Dismissed Upsell and Never Set the Break Reminder
(Teen EN Country Take a Break Upsell Experiment, 2021-11-02 to 2021-11-29)



Variant	Dismissal Rate Lower CI	Dismissal Rate	Dismissal Rate Upper CI
+10 Minutes	6.63	6.83	7.03
+20 Minutes	7.05	7.27	7.49

Break Reminder Usage Rate

Meaningful Break Usage Across Both Variants and All Break Reminder Settings.



Variant	Break Reminder Value	Break Usage Rate Lower CI	Break Usage Rate	Break Usage Rate Upper CI
+10 Minutes	10 Minutes	14.00	14.79	15.60
+10 Minutes	20 Minutes	17.35	18.94	20.64
+10 Minutes	30 Minutes	15.21	17.26	19.54
+20 Minutes	10 Minutes	13.27	14.00	14.77
+20 Minutes	20 Minutes	15.93	17.61	19.44
+20 Minutes	30 Minutes	12.64	14.40	16.37

First Month Projections

Based on test data

	Step in Month 1	# of Teens in 6 EN countries	% of prior	# of Teens in 6 EN countries	% of prior
1		10 min		20 min	
2	IG u18 MAU in 6 EN countries	35M		35M	
3	Eligible for TaB upsell*	9M	26%	9M	26%
4	See TaB upsell**	1M	11.3%	790k	8.7%
5	Activate control	36.8k	3.6%	30.8k	3.9%
6	See break experience >=1 time	18.8k	51%	15.9k	52%
7	Use break experience to leave app >=1 time	10.2k	54%	8.9k	56%
8	Use break experience to leave app >=3 times	3.3k	32%	2.7k	31%

* Eligibility considerations: only stated age, adding English locale, iOS, and adding the app version constraint

** Seeing upsell depends on hitting trigger criteria while scrolling down Explore "similar posts" view

+20 Minute Variant IG Criticals Ecosystem Impact

+20 Minute Variant Ecosystem Impact							
Description	Fully Qualified Name	Pillar	Materiality Threshold (Budget)	Topline Impact Lower Bound	Topline Impact Upper Bound	Topline Impact Stat-Sig?	Meets Budget?
Good User Experiences	instagram:perf:good_user_experiences	Product Foundation	-0.20%	-0.22%	0.06%	No	No
Overall Objectionable Prevalence	community_integrity:cep:viewer:ig_holistic_prevalence_world_combined	Wellbeing	1.00%	-0.77%	0.90%	No	Yes
Foreground Sessions	instagram:sessions:foreground_session_cnt:overall	Feed & Relevance	-0.20%	-0.11%	0.05%	No	Yes
Reels Intentional Plays	instagram:clips_media:video_playback:intentional_play_count:overall	Reels	-0.75%	-0.28%	0.12%	No	Yes
Stories Impressions	instagram:media_vpvdp_impressions:stories:home	Stories	-0.30%	-0.07%	0.21%	No	Yes
Feed Impressions	instagram:post_vpvdp_impressions:feed:home	Feed & Relevance	-0.50%	-0.14%	0.03%	No	Yes
Direct Sends	instagram:direct:sends:overall	N/A	-1.00%	-0.18%	0.25%	No	Yes
IG Time Spent	instagram:time_spent:overall	N/A	-0.20%	-0.12%	0.10%	No	Yes
Infra - Power	instagram:efficiency:normalized_power:overall	Infra	0.40%	-0.10%	0.03%	No	Yes
Infra - TAO	instagram:efficiency:tao_fboobj_get:overall	Infra	0.40%	-0.11%	0.03%	No	Yes
IG DAP	instagram:growth:instagram_classic:dap:overall	Growth	-0.20%	-0.04%	0.01%	No	Yes
Original Stories Creation	instagram:creation:producer_i7:original_media:stories	Stories	-0.50%	-0.11%	0.11%	No	Yes
Reels Producer DAP	instagram:creation:clips_media_producer_dap:overall	Reels	-2.00%	-1.51%	1.06%	No	Yes
Creator Watch Time	instagram:video_consumption:viewer:creator_watch_time_60s_capped:excluding_stories	Creators	-0.50%	-0.18%	0.09%	No	Yes
IG Revenue	instagram:abp:ad_metrics:revenue_usd_cents:overall	IG4B	-0.20%	-0.07%	0.20%	No	Yes
IG DAU	instagram:growth:instagram_classic:dau:overall	Growth	n/a	-0.04%	0.01%	No	Yes

Source query: <https://fburl.com/deltoid3/u679t6ji>

Color Key:	Reach:
Doesn't violate topline threshold, stat-sig	8.70%
Violates topline threshold, stat-sig	
No stat-sig difference between topline threshold and topline impact	

+10 Minute Variant IG Criticals Ecosystem Impact

+10 Minute Variant Ecosystem Impact							
Description	Fully Qualified Name	Pillar	Materiality Threshold (Budget)	Topline Impact Lower Bound	Topline Impact Upper Bound	Topline Impact Stat-Sig?	Meets Budget?
Good User Experiences	instagram:perf:good_user_experiences	Product Foundation	-0.20%	-0.29%	0.07%	No	No
Overall Objectionable Prevalence	community_integrity:cep:viewer:ig_holistic_prevalence_world_combined	Wellbeing	1.00%	-1.00%	1.17%	No	No
Foreground Sessions	instagram:sessions:foreground_session_cnt:overall	Feed & Relevance	-0.20%	-0.14%	0.06%	No	Yes
Reels Intentional Plays	instagram:clips_media:video_playback:intentional_play_count:overall	Reels	-0.75%	-0.37%	0.16%	No	Yes
Stories Impressions	instagram:media_vpvd_impressions:stories:home	Stories	-0.30%	-0.09%	0.27%	No	Yes
Feed Impressions	instagram:post_vpvd_impressions:feed:home	Feed & Relevance	-0.50%	-0.18%	0.04%	No	Yes
Direct Sends	instagram:direct:sends:overall	N/A	-1.00%	-0.23%	0.32%	No	Yes
IG Time Spent	instagram:time_spent:overall	N/A	-0.20%	-0.15%	0.14%	No	Yes
Infra - Power	instagram:efficiency:normalized_power:overall	Infra	0.40%	-0.13%	0.04%	No	Yes
Infra - TAO	instagram:efficiency:tao_fobj_get:overall	Infra	0.40%	-0.14%	0.04%	No	Yes
IG DAP	instagram:growth:instagram_classic:dap:overall	Growth	-0.20%	-0.01%	0.01%	No	Yes
Original Stories Creation	instagram:creation:producer_l7:original_media:stories	Stories	-0.50%	-0.15%	0.15%	No	Yes
Reels Producer DAP	instagram:creation:clips_media_producer_dap:overall	Reels	-2.00%	-1.96%	1.37%	No	Yes
Creator Watch Time	instagram:video_consumption:viewer:creator_watch_time_60s_capped:excluding_stories	Creators	-0.50%	-0.24%	0.11%	No	Yes
IG Revenue	instagram:abp:ad_metrics:revenue_usd_cents:overall	IG4B	-0.20%	-0.09%	0.26%	No	Yes
IG DAU	instagram:growth:instagram_classic:dau:overall	Growth	n/a	-0.05%	0.02%	No	Yes

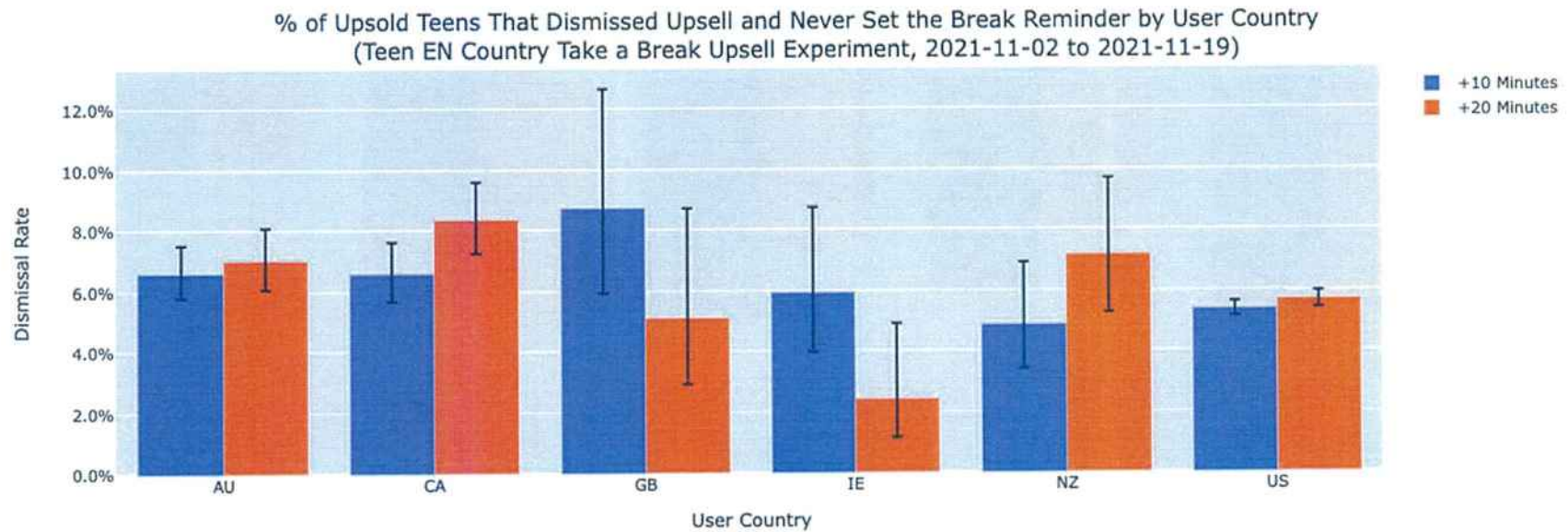
Source query: <https://fburl.com/deltoid3/pxd9mtop>

Color Key:	Reach:
Doesn't violate topline threshold, stat-sig	11.28%
Violates topline threshold, stat-sig	
No stat-sig difference between topline threshold and topline impact	

Upsell Dismissal Rate TL;DR

- The Upsell dismissal rate, defined as the percent of upsold teens that dismissed the upsell and never set the break reminder, in both the 10 min and 20 min variants remain below the 20% success benchmark overall: at about 6%.
- Above is true for teen boys and girls but not teens that use custom gender identities. For those teens, only 15 year olds in the 20 min variant, 16 year olds in both variants, and 17 year olds in the 10 min variant have dismissal rates below the 20% benchmark. However the sample size for these teens is small (~20 for 13 year olds and ~150-200 for +14).
- For both variants, dismissal rates are lower for teens with higher historical NAC prevalence but higher for teens that tend to have longer sessions. However differences between variants are mostly non-stat-sig.

Dismissal Rates Consistently Below 20% Benchmark Across EN Speaking Countries

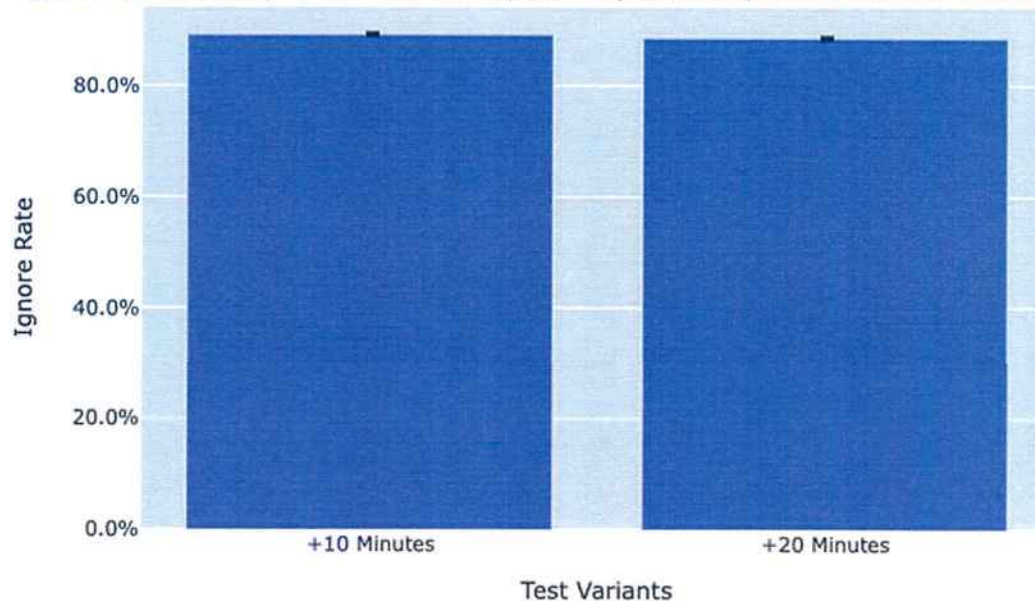


Ignore Rates TL;DR

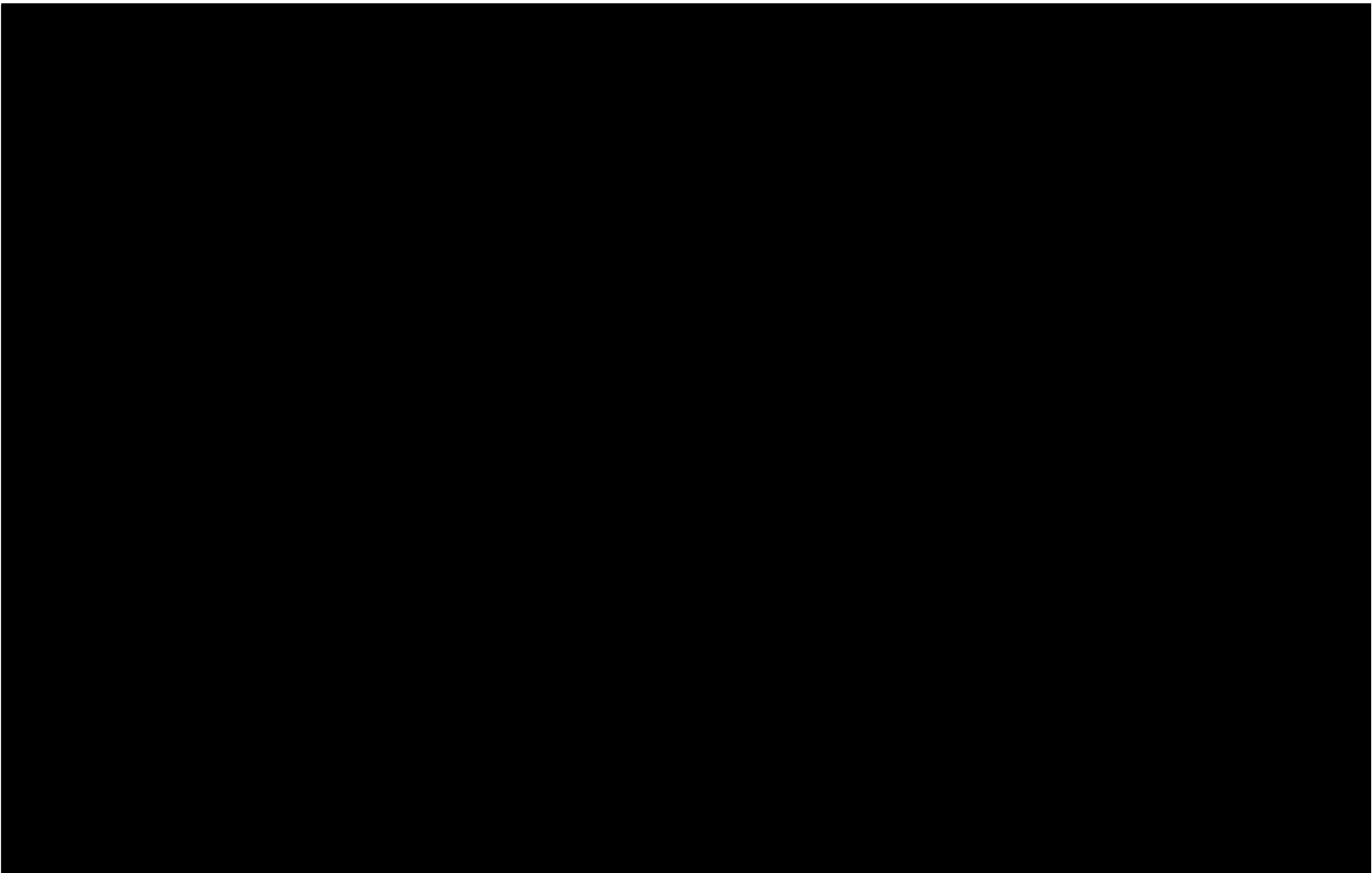
- Most teens ignore the upsell and never set the break reminder: 88-89% ignore it and don't set the reminder. No stat-sig differences between variants.
- After moderate jump post first day of upsell impressions, ignore rates decline steadily from 96-97% to 93% by the 15th day since first upsell impression.
- There are no stat-sig or practical differences in ignore rates by teen historical NAC prevalence, however teens that tend to have longer sessions ignore the upsell at lower rates.

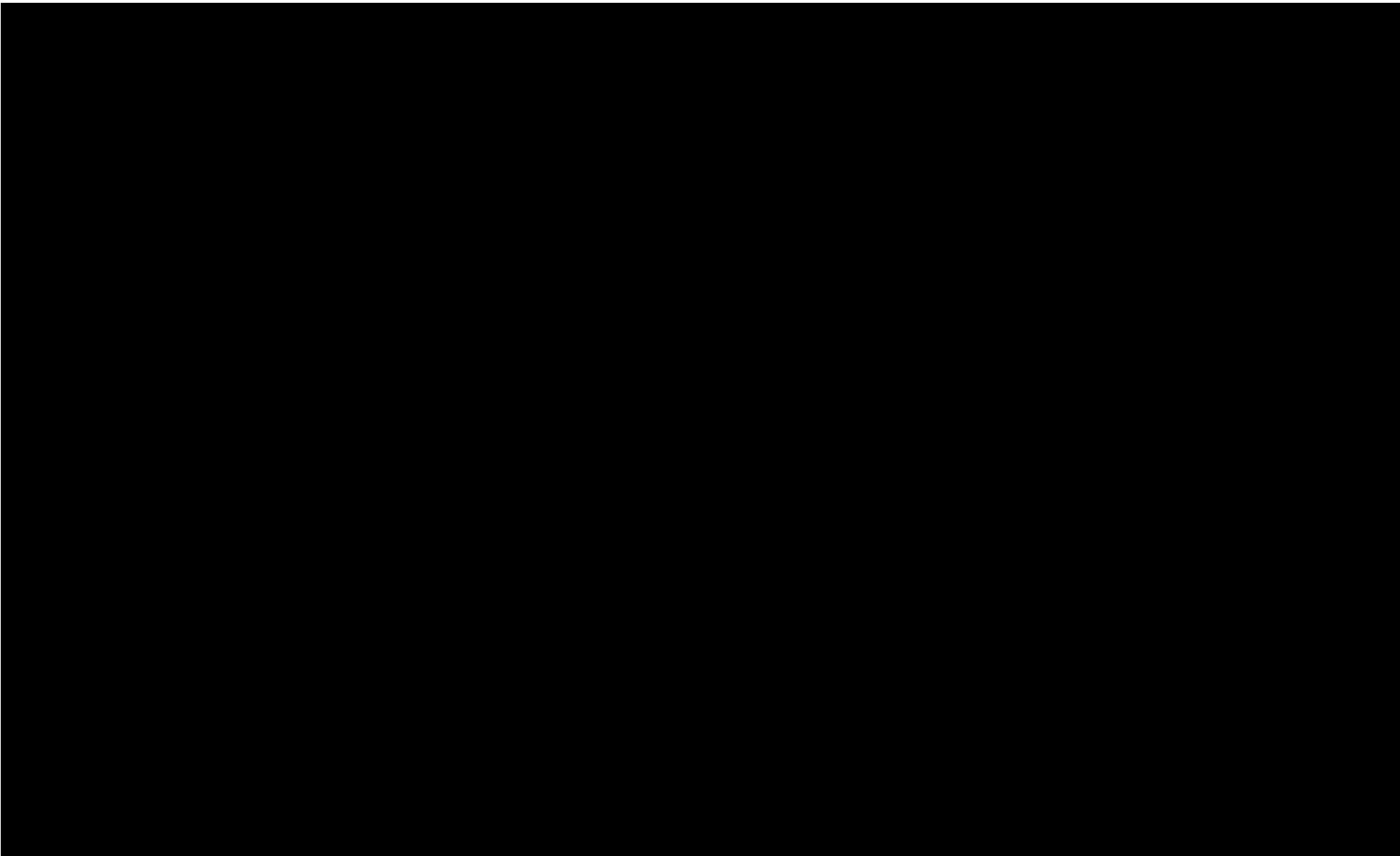
Most Teens Ignore TaB Upsell; No Stat-sig Differences Between Variants

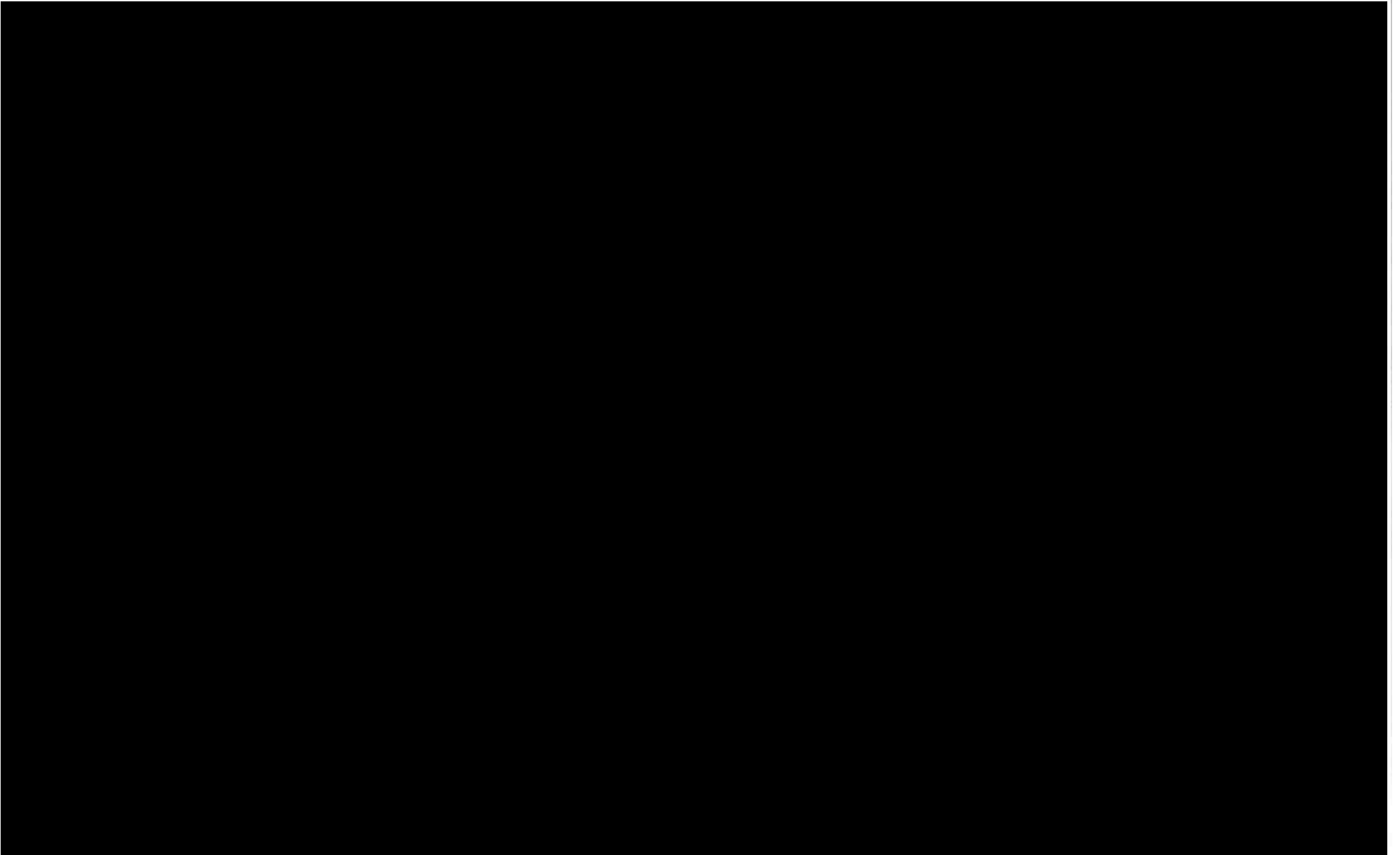
% of Upsold Teens That Ignored Upsell and Never Set the Break Reminder
(Teen EN Country Take a Break Upsell Experiment, 2021-11-02 to 2021-11-19)

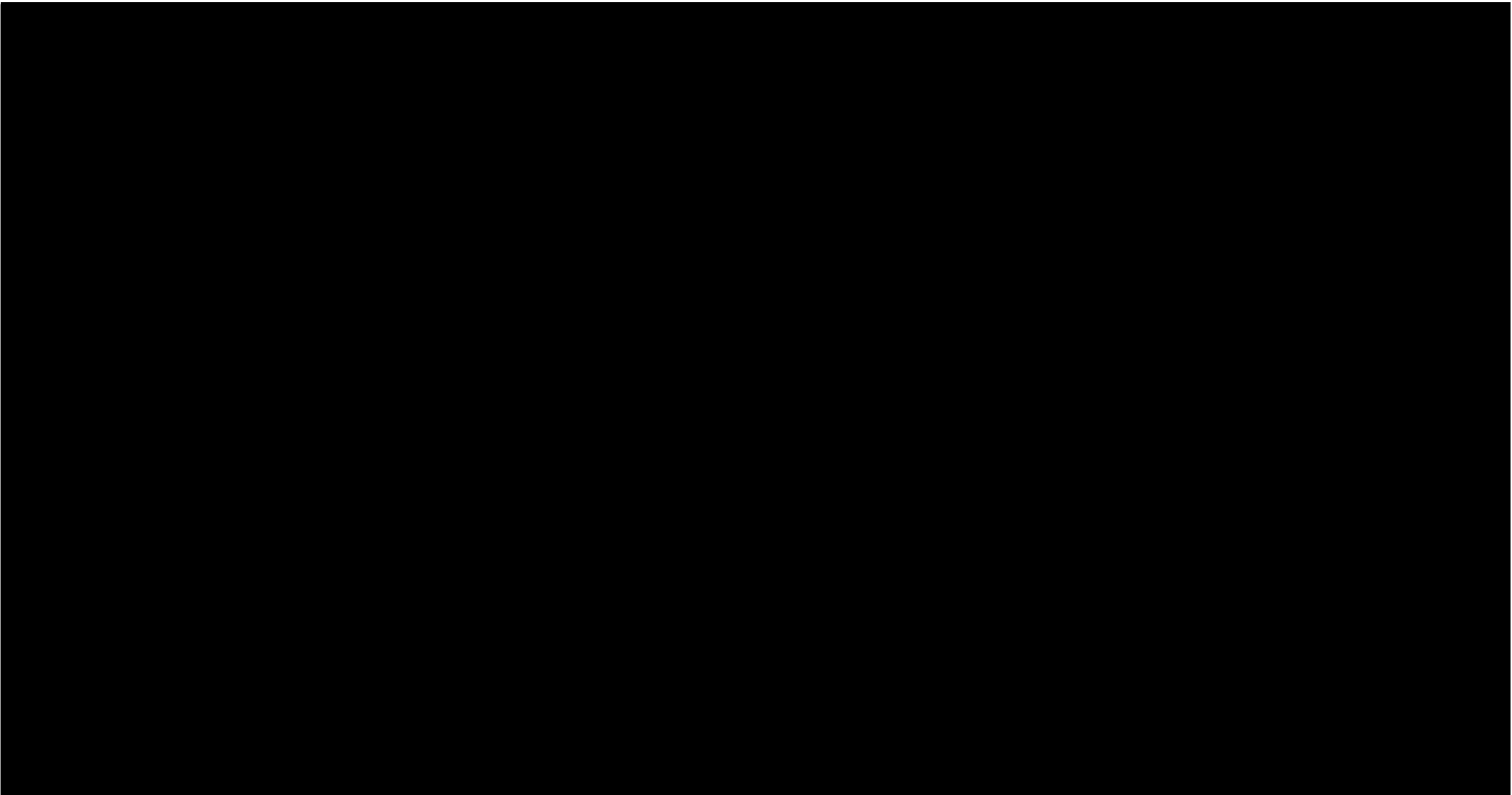


Variant	Ignore Rate	Lower CI	Upper CI
+10 Minutes	88.9	89.18	89.45
+20 Minutes	88.2	88.51	88.81

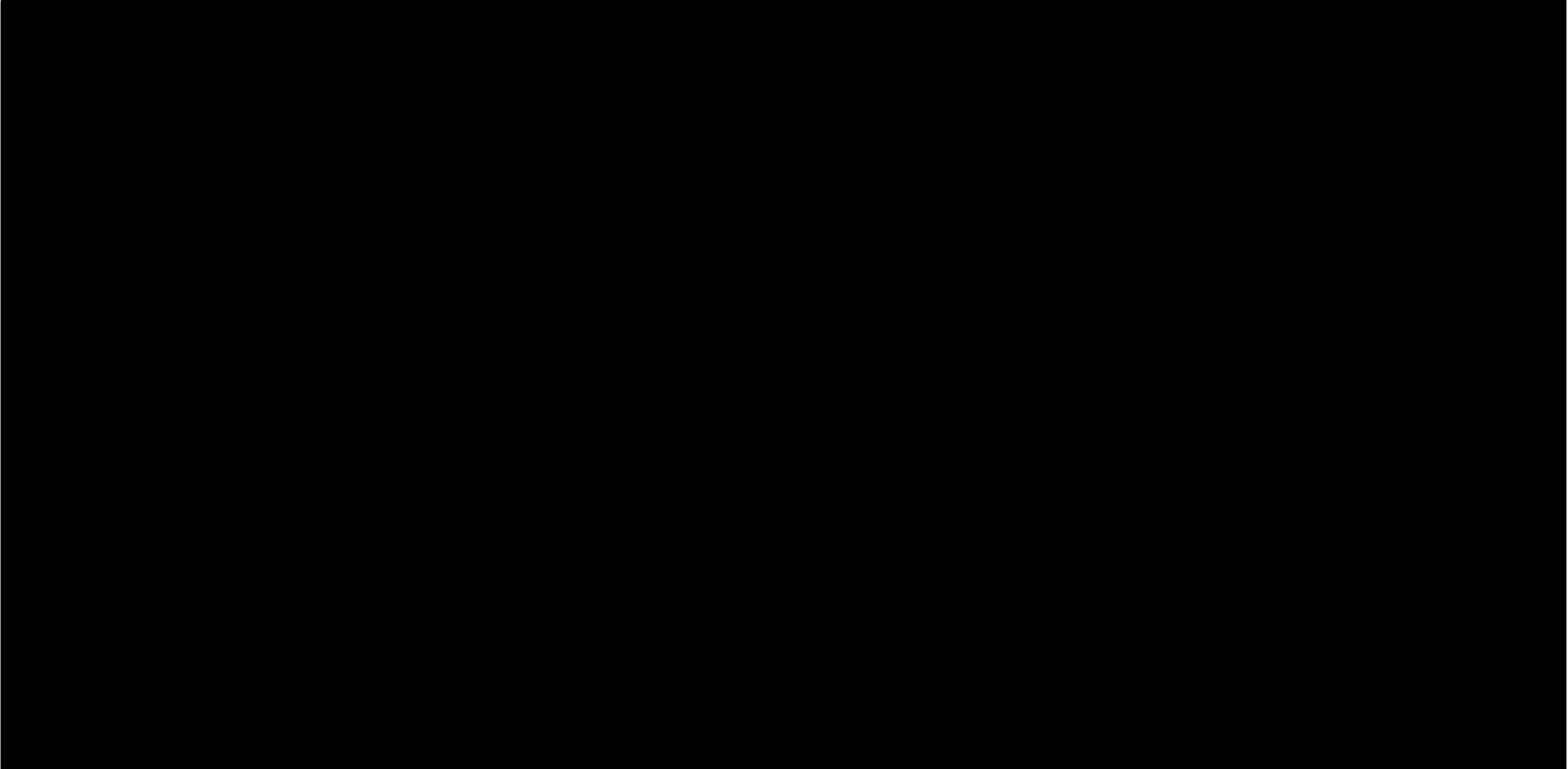


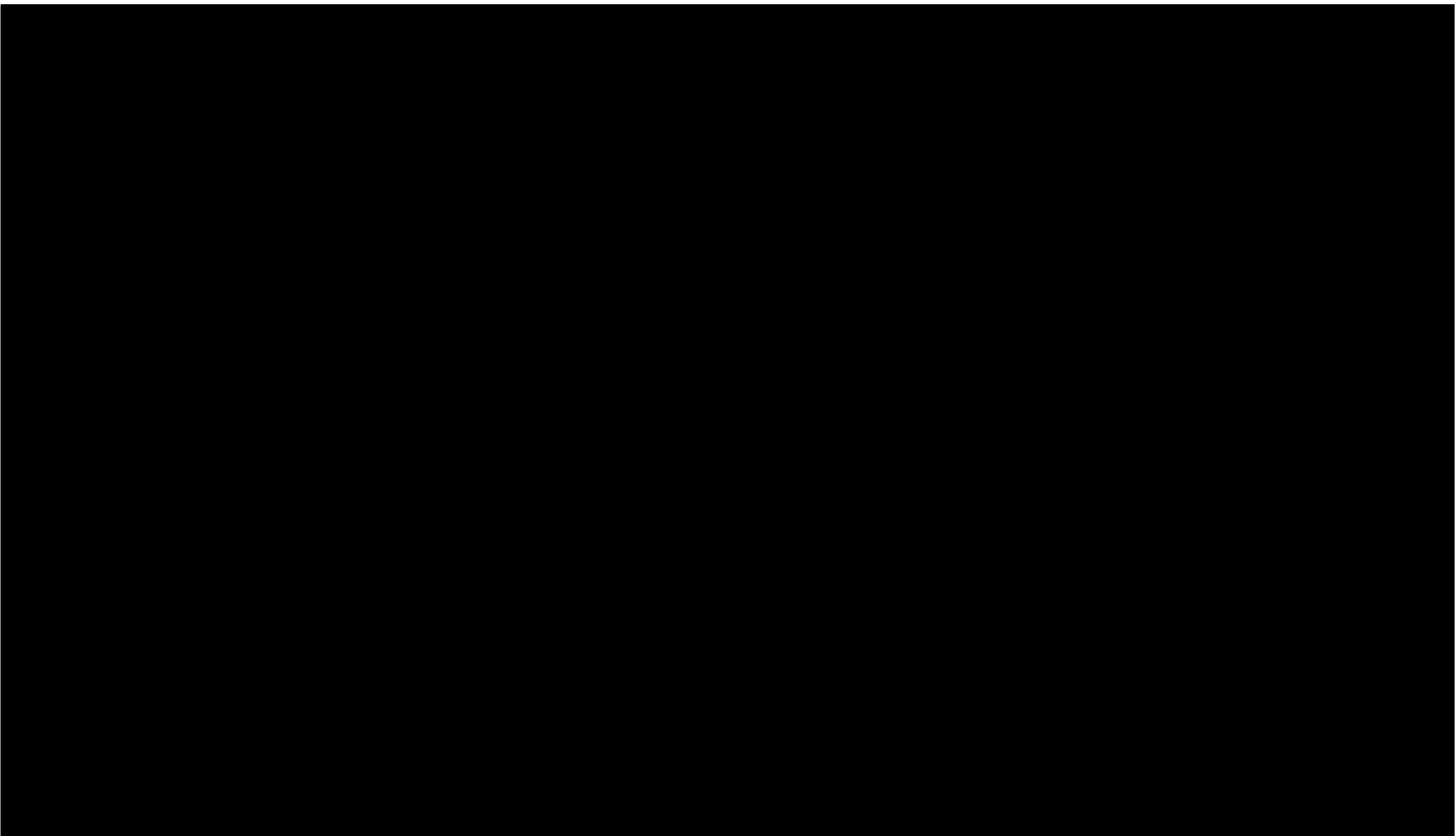


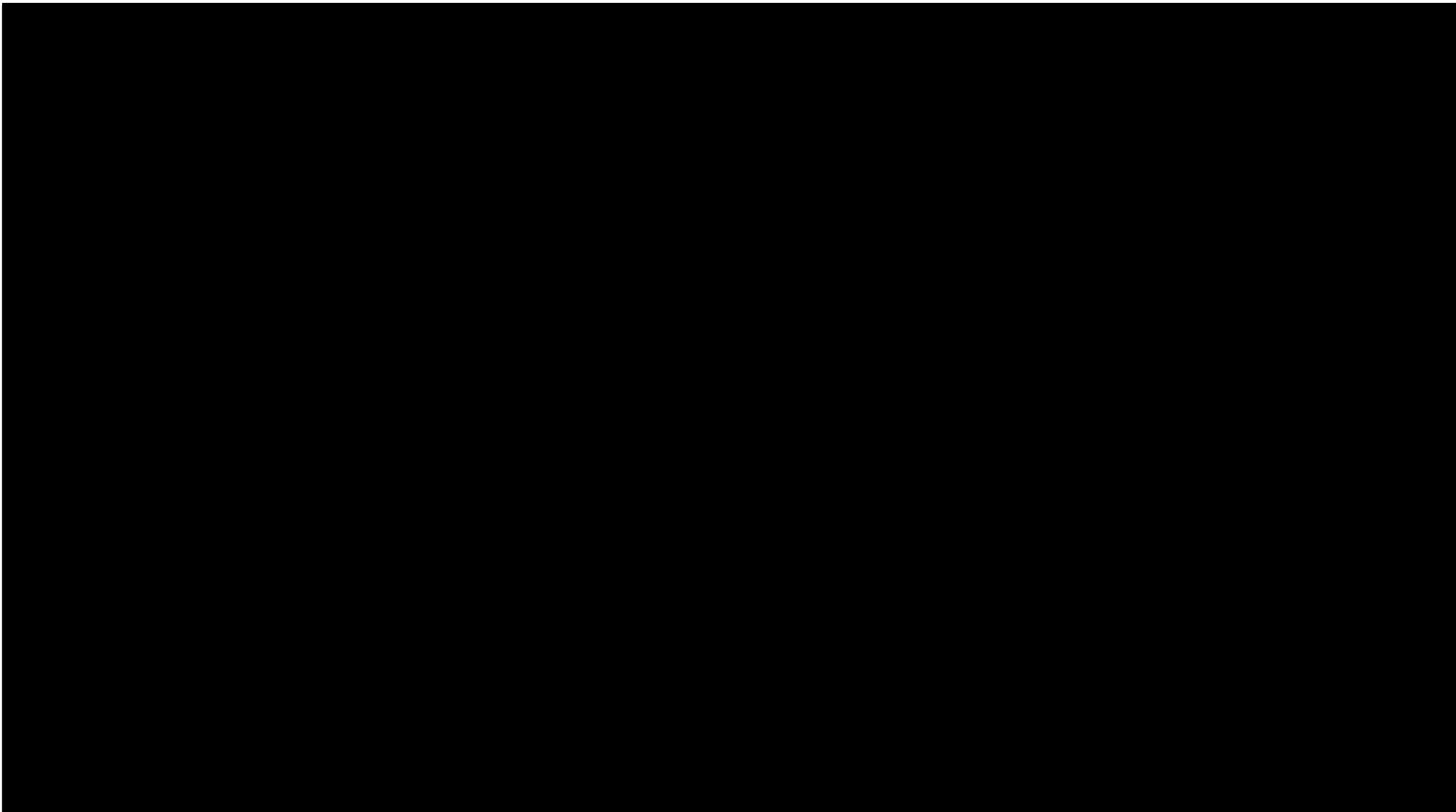


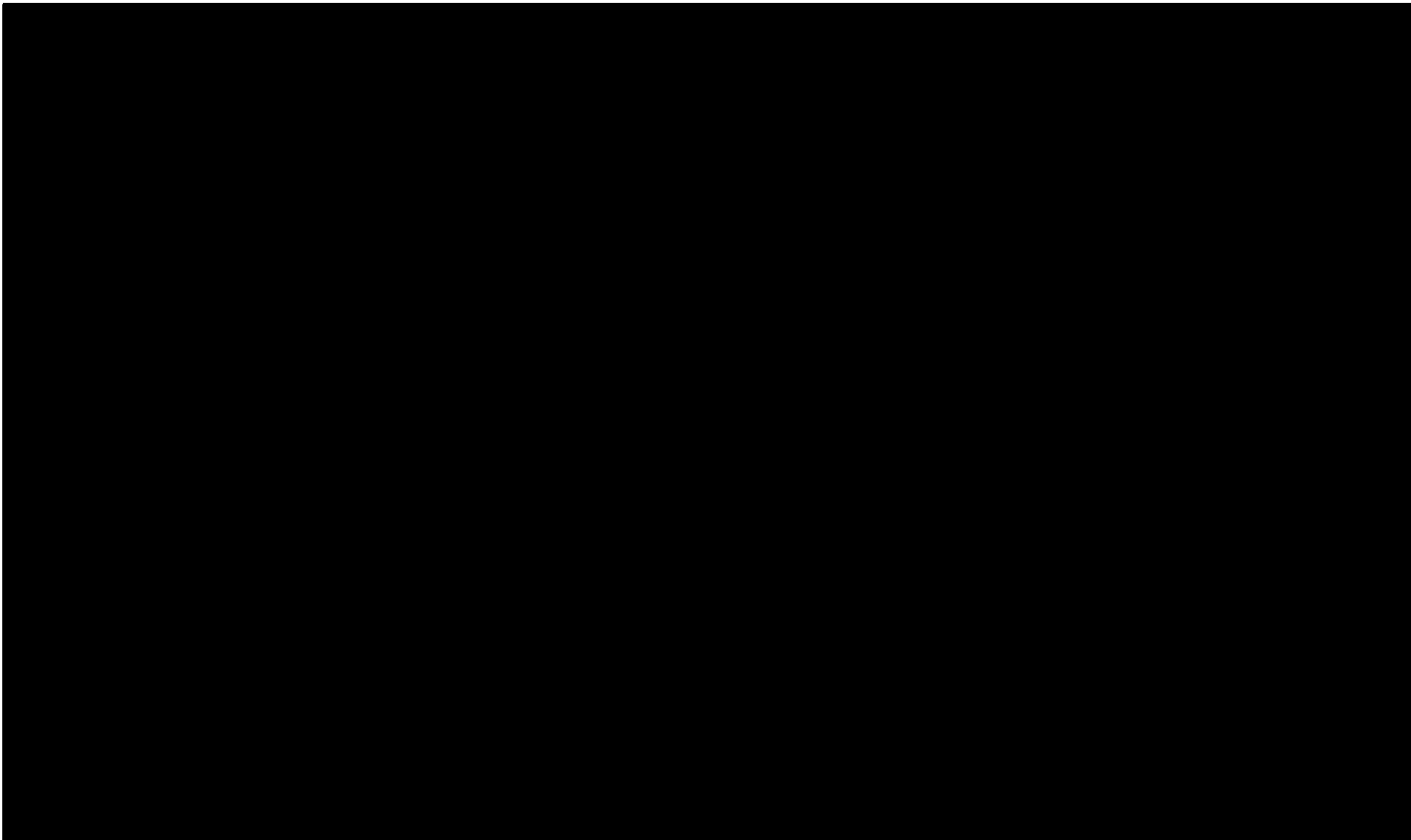


No FB Critical Regressions in Delta Time Series View

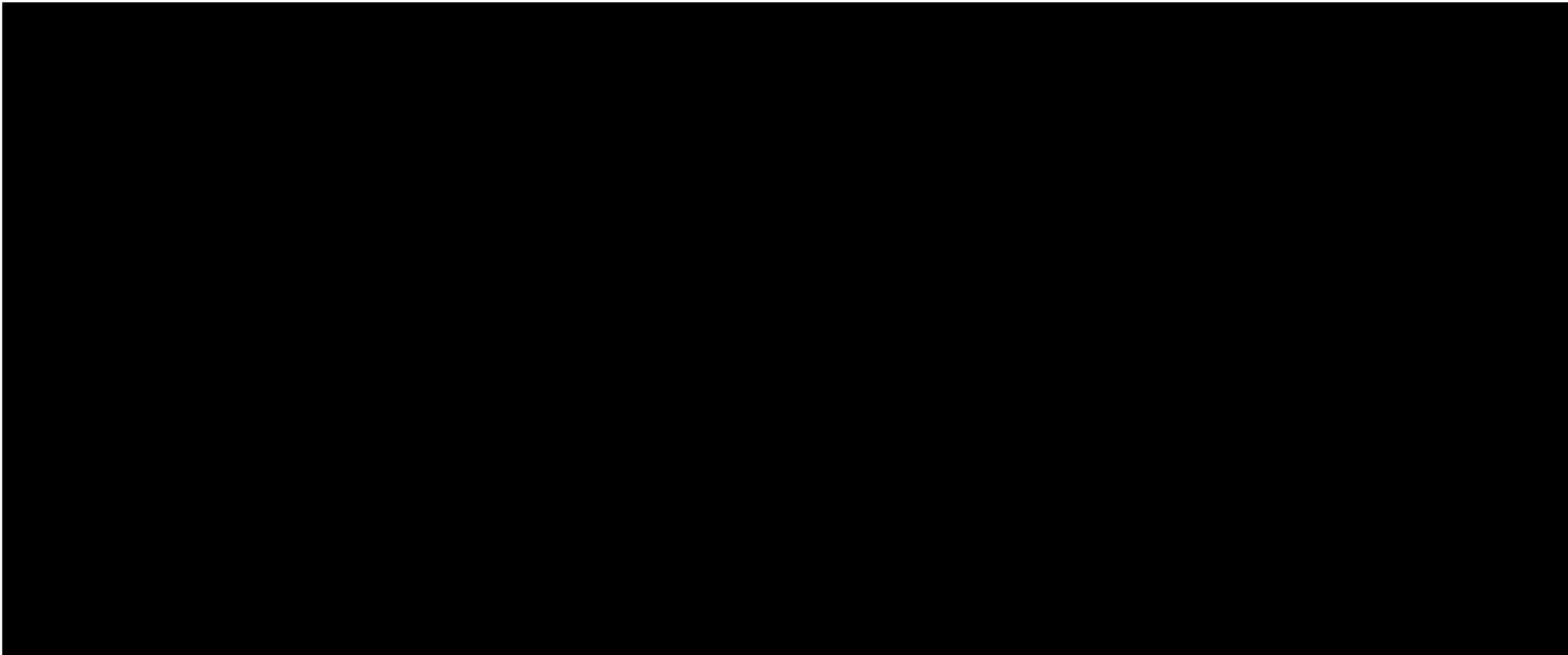


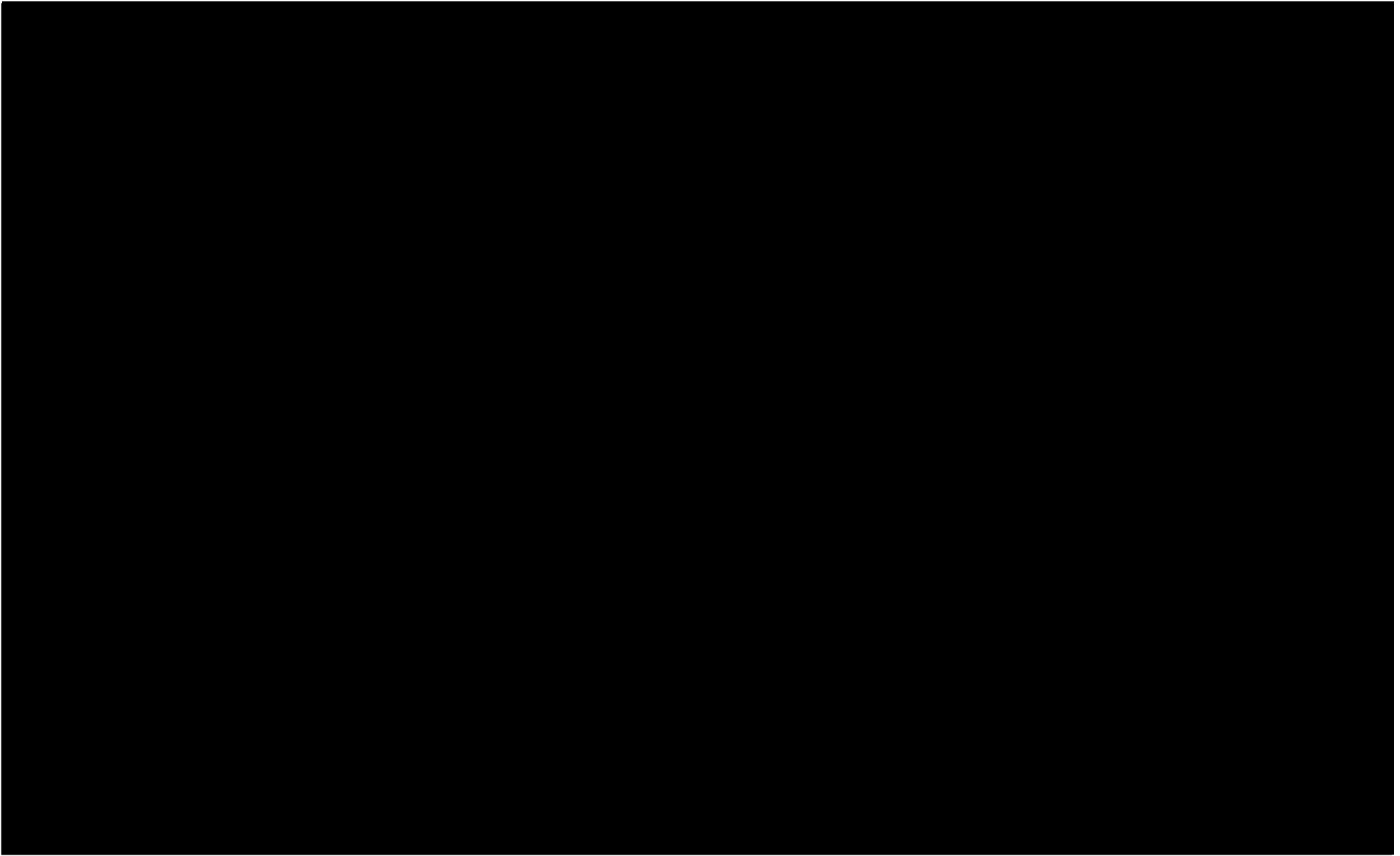




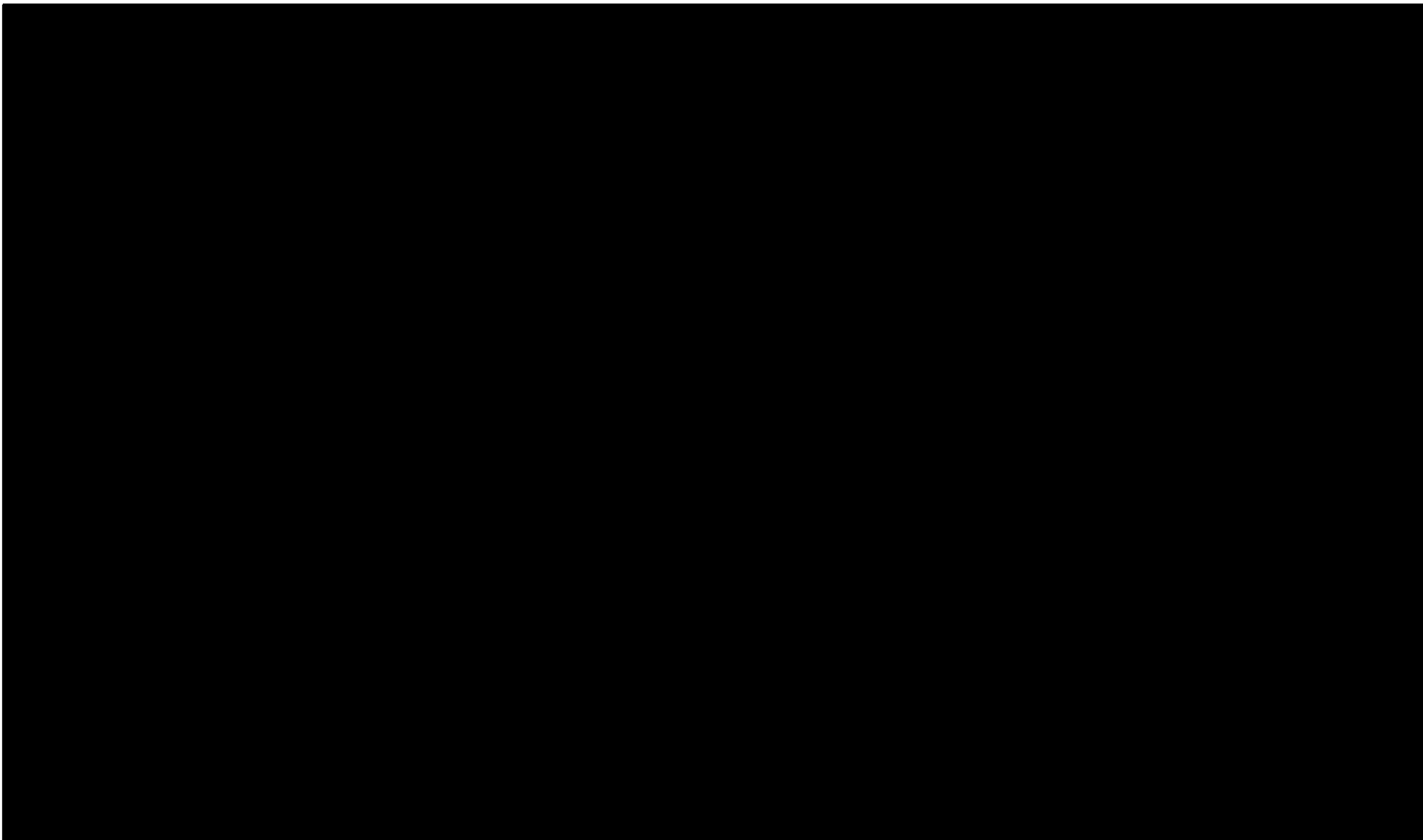


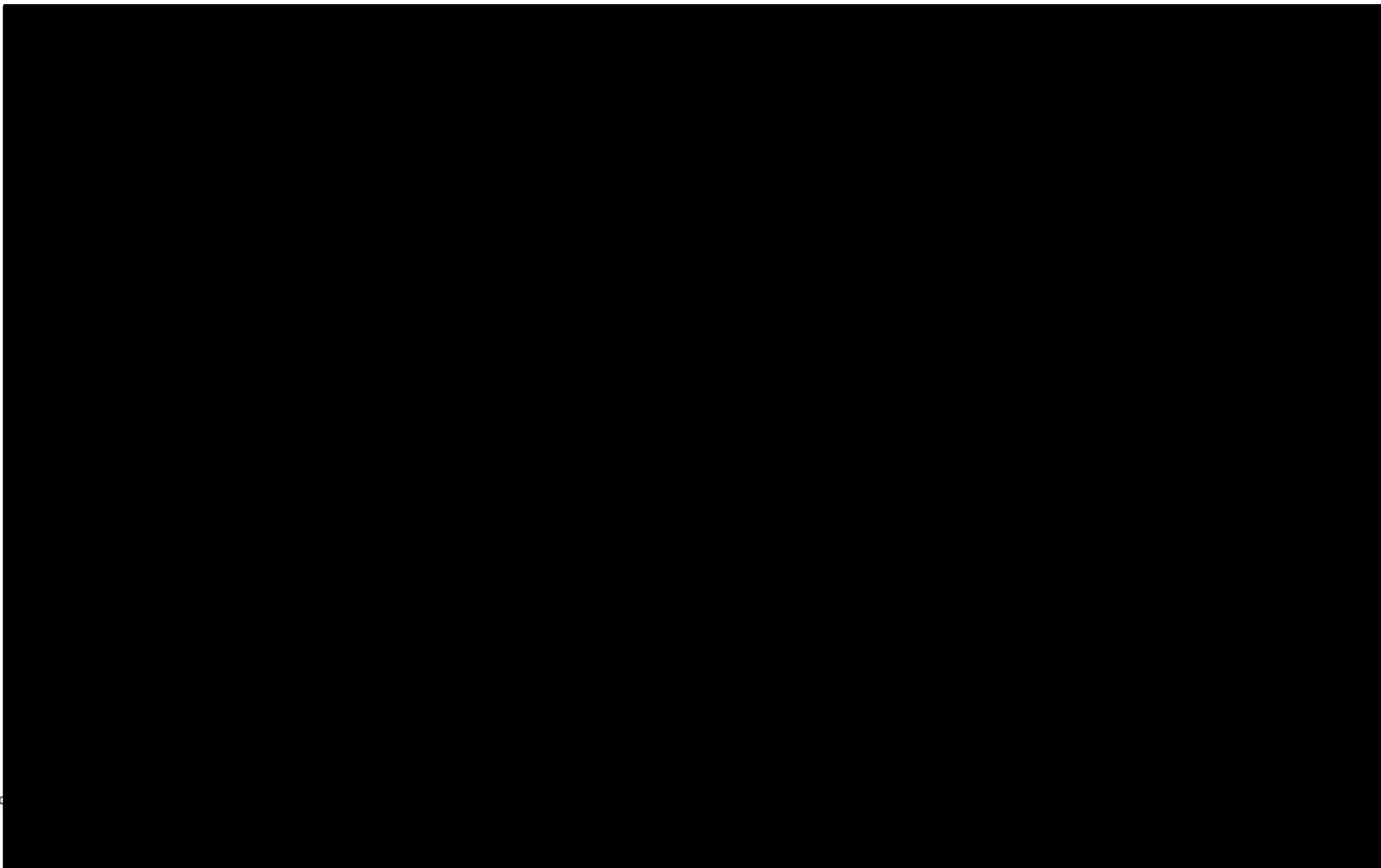


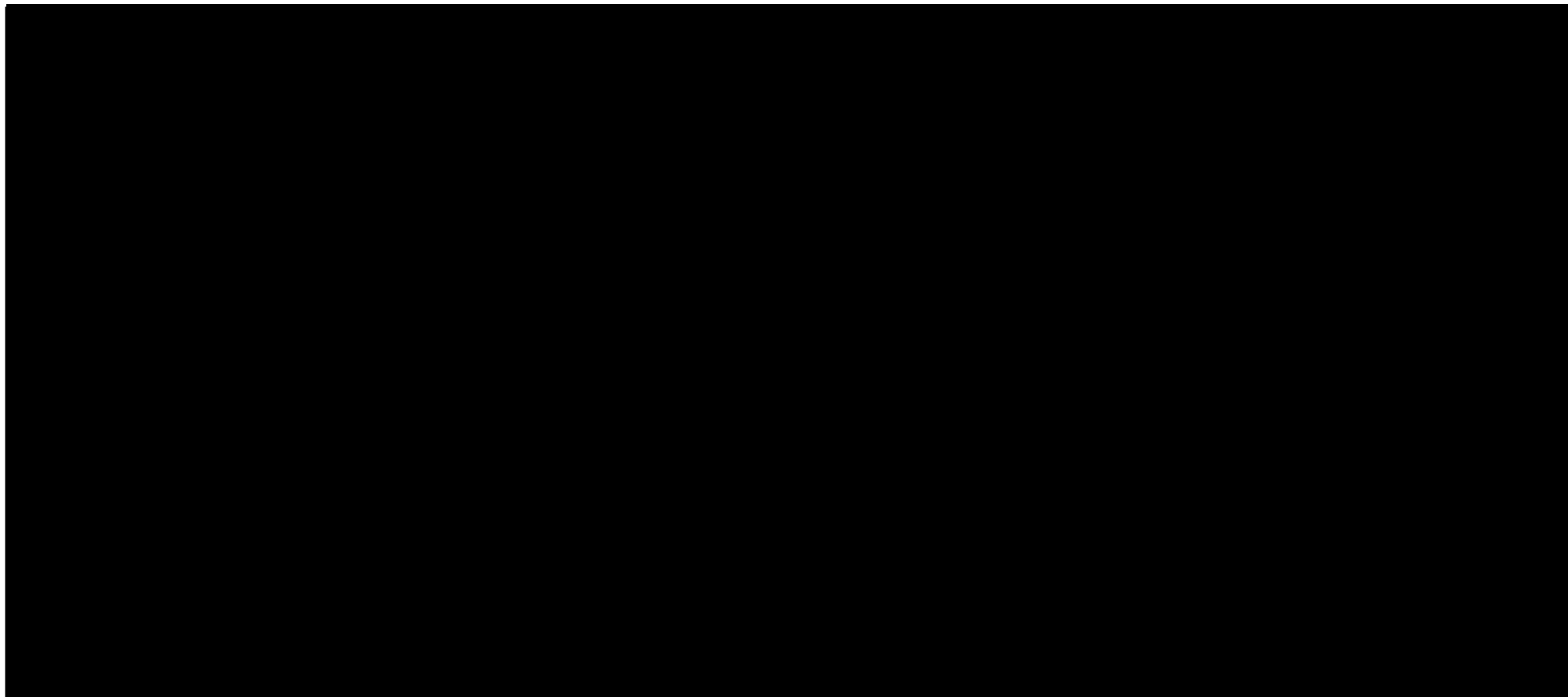


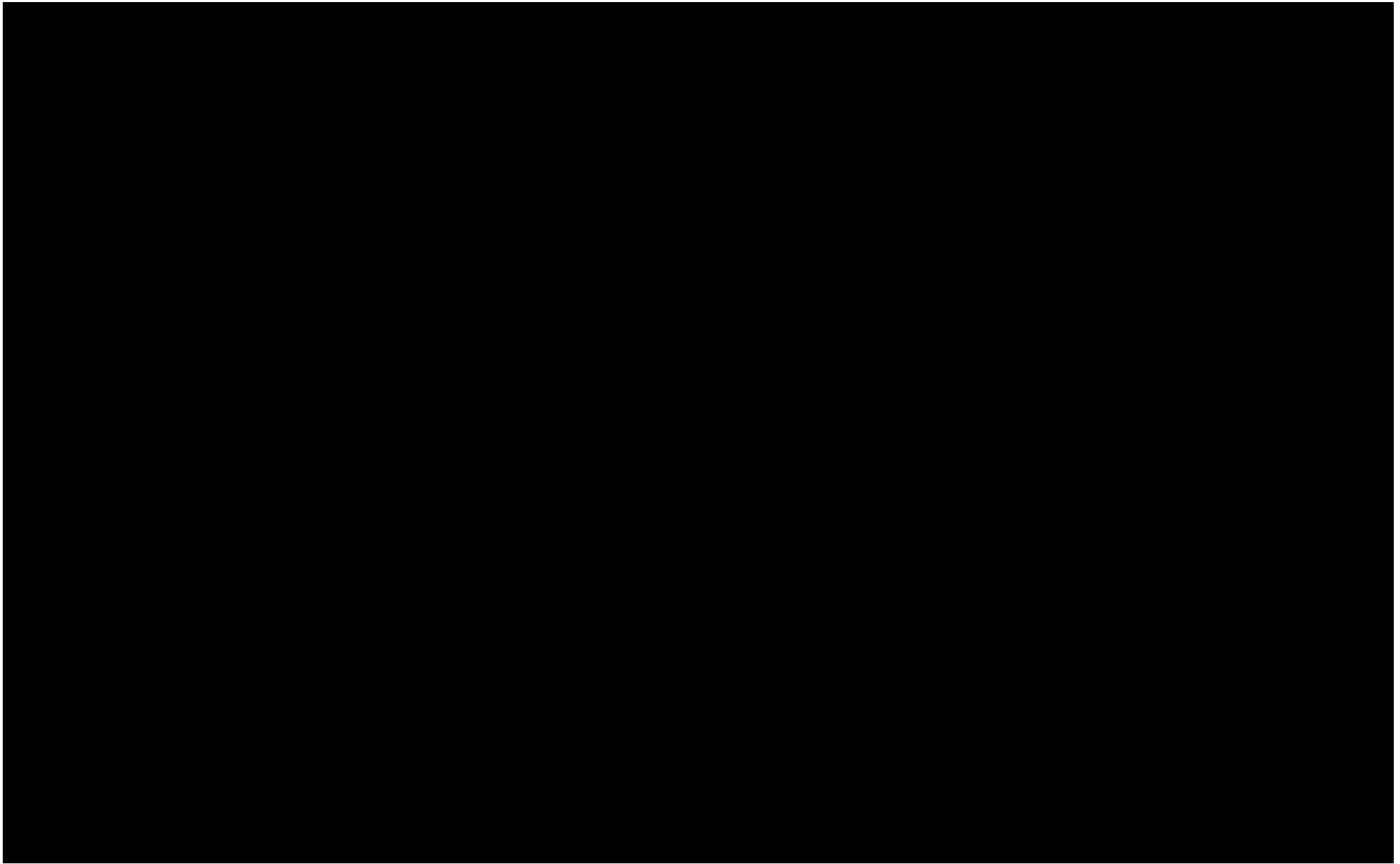












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