

AMENDED Exhibit 280

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

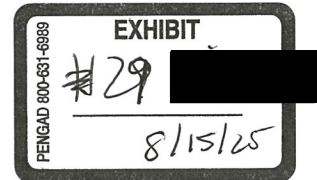
MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Draft Memo | Horizontal Findings on IG Competitors from Teen Research 02-26-2020

Research studies these are drawn from:

- Instagram Household Ecosystem Project - Rounds 1 & 2 Mid-Point Insights 01-17-2020 DRAFT
- Instagram Modern Teens Research - 7/26/2019
- Instagram "Teens, Let's Play" Research Summary - 4/30/2019
- Instagram Borderline Content Ad-Hoc Research FINAL - 8/29/2019



Informal observations on IG competitors from across multiple long-term investment studies with teens:

TikTok

- Teens tended to make many, many TikTok videos that they kept as drafts and only shared with friends or family members via their phone screen. They publicly shared relatively few.
- Parents appear not to be as vigilant about TikTok as they are about Instagram and Snapchat. Reasons may be:
 - They are less familiar with TikTok overall and may be less aware of the challenges
 - They think it is more of a video platform like YouTube, not a social media platform
 - It is possible to "turn off" the messaging, which is one of their biggest concerns about social media for their kids
 - Since it is all about dancing, it feels fun and to some degree healthy - their biggest concern seems to be curse words in dance music
- Teens loved learning and making dances and found it fun to do these with family members who willingly participated. This was a creative and connecting shared activity for the whole family.
- Rural tweens expressed an enormous interest and enthusiasm for TikTok and dancing generally. They expressed an interest in becoming actors/performers or dancers. Many of them had long hours in a home with very little to do and only screens to keep them busy, and creating TikToks alone or with friends was an exciting and creative way to fill the time.
- TikTok appears to give teens the sense that they/their content could actually go viral, which they did not express with Instagram. Some mentioned that they had been featured on the For You page, or that their friends had, which was exciting.
- One teen talked about making TikToks as a kind of "catharsis" when she was feeling angry about a misunderstanding with friends. It helped her laugh and get out of a dark mood.
- Extremely young kids (preteens) are engaged and excited about TikToks. They like to watch them and they get involved with helping their older siblings make them.

Snapchat

- Teens rely on Snapchat for much of their of-the-moment messaging, especially anything that highlights what they are doing now, how they are feeling, and making plans
- Some teens have talked about seeing bad content on Snapchat and there is a sense that it is less controlled/curated than Instagram.

I tend to have separate conversations on separate social media platforms. On Snapchat it will be more what I am doing at a very moment...on Instagram it's not what you're doing at the moment, but funny videos. Certain posts that you want to send to them that doesn't have a time constraint. A lot of people have their post notifications off on Instagram. Like I do. So I don't know when someone DMs me. I'll go on Instagram twice a day and I'll see it. For Snapchat most people have their notifications on so they'll get it right away and they can open it...- P11, Teens, Let's Play

Instagram

- Main IG JTBD for teens:
 - Maintain relationships by finding and sharing fun content to stimulate conversations with friends

- Find ideas, inspirations, and raw materials to express themselves in posts and Stories
 - Maintain a page to represent them, highlighting their popularity, and evolve it as their identity changed
 - Incubate creative endeavors through separate accounts dedicated to these pursuits
 - Create an identity for a friendship or peer group through a shared account
- Over the past year, we have heard that many teens are less and less engaged with their insta/spam/secondary account. They say they don't know what to post or aren't into it — they characterize it as a kind of fad or thing from the past. Also, many also are not using their Close Friends lists much/yet. In the meantime, Snapchat has become more of a hub for intimate/close friend communication.
- Many teens had turned off IG notifications after receiving many annoying notifications, and assumed their friends' ones were off. Therefore they seldom sent time-sensitive communication via IG. Mostly, they shared content from Explore such as videos or memes via DM, but didn't expect immediate replies. In contrast, almost all teens keep Snapchat notifications on all the time.
- Many teens have problems with their IG passwords. Several we talked with had to abandon accounts because they couldn't get back into the IG account with all their content, which was dispiriting, and sometimes caused them disengage from IG generally.
- Teens go through Instagram "eras" whereupon suddenly they see all their past IG activity as "cringey." Then they want to delete/archive large numbers of posts, or "start fresh," but this is a lot of work.
- Repeatedly over the past year, across topics and workstreams, we've heard teens complain bitterly about Instagram's non-chronological feed. Complaints about the non-chronological feed come up all the time across our rolling and ad-hoc research for Community, Sharing Experiences, Feed/Home/Discovery and others. Many say that if they could change one thing about IG, this is what they would change.
 - Although the non-chronological feed fuels increased time spent on the site, teen users say that it makes it much more difficult for them to find relevant info about their closer friends.
 - For teens, in many cases, the timing of actions (shares, likes, comments) is as important to them as the content itself, and the non-chronological feed makes it much more difficult to get a sense of what's happening "now" - something that Snapchat excels at.

[Contact Support](#)

Conversation History

opened your conversation with [REDACTED] [REDACTED] [REDACTED]
[REDACTED] and [REDACTED] Jun 11, 2021 at 2:00 am

opened your conversation with [REDACTED] [REDACTED] [REDACTED]
[REDACTED] and [REDACTED] May 7, 2020 at 4:38 pm

added [REDACTED] to the thread May 7, 2020 at 4:22 pm

added you to a document May 7, 2020 at 4:13 pm

Apr 27, 2020 at 11:27 pm

This speaks to the question [REDACTED] has on notifications for Direct

edited Apr 27, 2020 at 11:26 pm

opened your conversation with [REDACTED] [REDACTED] [REDACTED]
[REDACTED] and [REDACTED] Apr 15, 2020 at 10:28 pm

