

AMENDED Exhibit 1115

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



META3047MDL-003-00110240-META3047MDL-003-00110276



TEEN WELL-BEING FOUNDATIONAL RESEARCH: US, UK, DE, FR, JP

Marketing Insights
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EXECUTIVE SUMMARY

"Well-being" is not in the teen lexicon. However, teens who use Instagram at least monthly report being generally satisfied with their lives.

- Teens don't use the phrase "well-being" and confuse it with wellness and mindfulness.
- In general, teens report being satisfied with their lives and various dimensions of well-being, specifically social dimensions, although they struggle to find balance in their busy lives and often feel stress or tired.
- Positive experiences happen more frequently and contribute more to overall well-being than negative experiences.
- Strong predictors of well-being include satisfaction with social connections (friends, family, classmates), performance in school and extracurriculars, and physical health (energy levels, eating habits, overall health and fitness).

EXECUTIVE SUMMARY (CONT.)

Teen-age Instagram users report experiencing benefits of social media more often than drawbacks. The top benefit is connecting with friends, while the largest drawback is the pressure to look perfect.

- Most teens feel social media in general has had a positive impact on their lives, specifically their relationship with their friends and their overall social lives.
- The most commonly expressed benefits of social media are connecting with friends and something to do during downtime.
- Negative experiences on social media happen less often than positive experiences; the most common are the pressure to look perfect and feeling that they spend too much time online.

EXECUTIVE SUMMARY (CONT.)

The positive and negative effects of Instagram on teens' well-being are interconnected.

- Inspiration, connection, and entertainment are heavily associated with Instagram. However, they can simultaneously contribute to and detract from teens' overall well-being.
- Feed, Profile, and Direct are common surfaces to encountering negative experiences on Instagram.
- Although awareness of safety features is not uniformly high, teens report using self-remediation tools when they run into problems.
 - Specifically, teens block individuals from following them or commenting on posts, make their accounts private, and delete content (comments or posts).

EXECUTIVE SUMMARY (CONT.)

Teens are receptive to communication about well-being from Instagram, but communications need to center on the connection with friends to resonate.

- Teens see Instagram as uniquely posed to address overall well-being, since community standards are higher than other platforms. Communication should be realistic without overstating Instagram's role in promoting overall well-being.
- **"Instagram helps me feel good by connecting me to my friends"** was the strongest performing positioning territory in all markets, followed by **"Instagram helps me feel good by connecting me with people who support me"**.
- Since teens don't use the phrase "well-being", language should describe the mindset of feeling positive, happy, and fulfilled.

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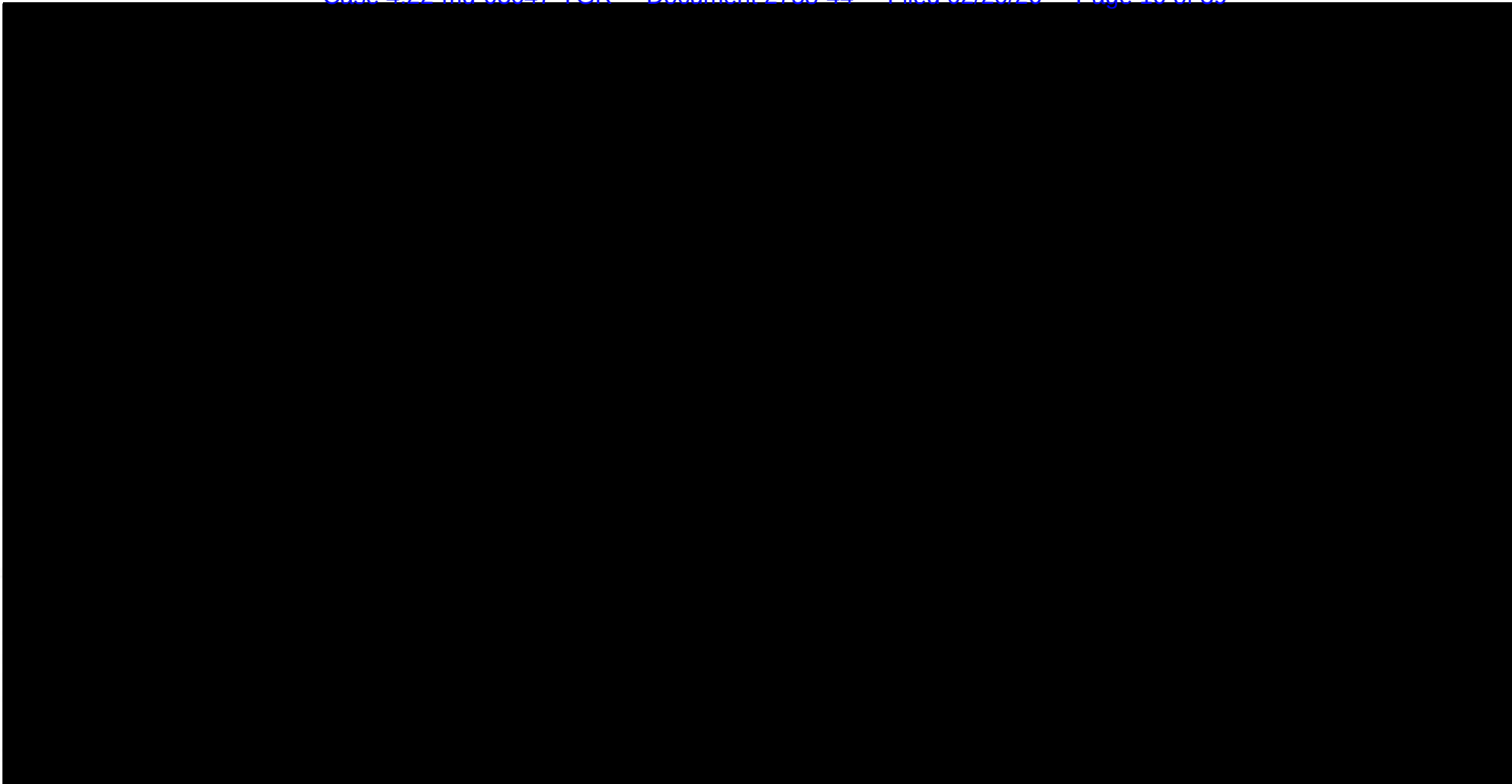
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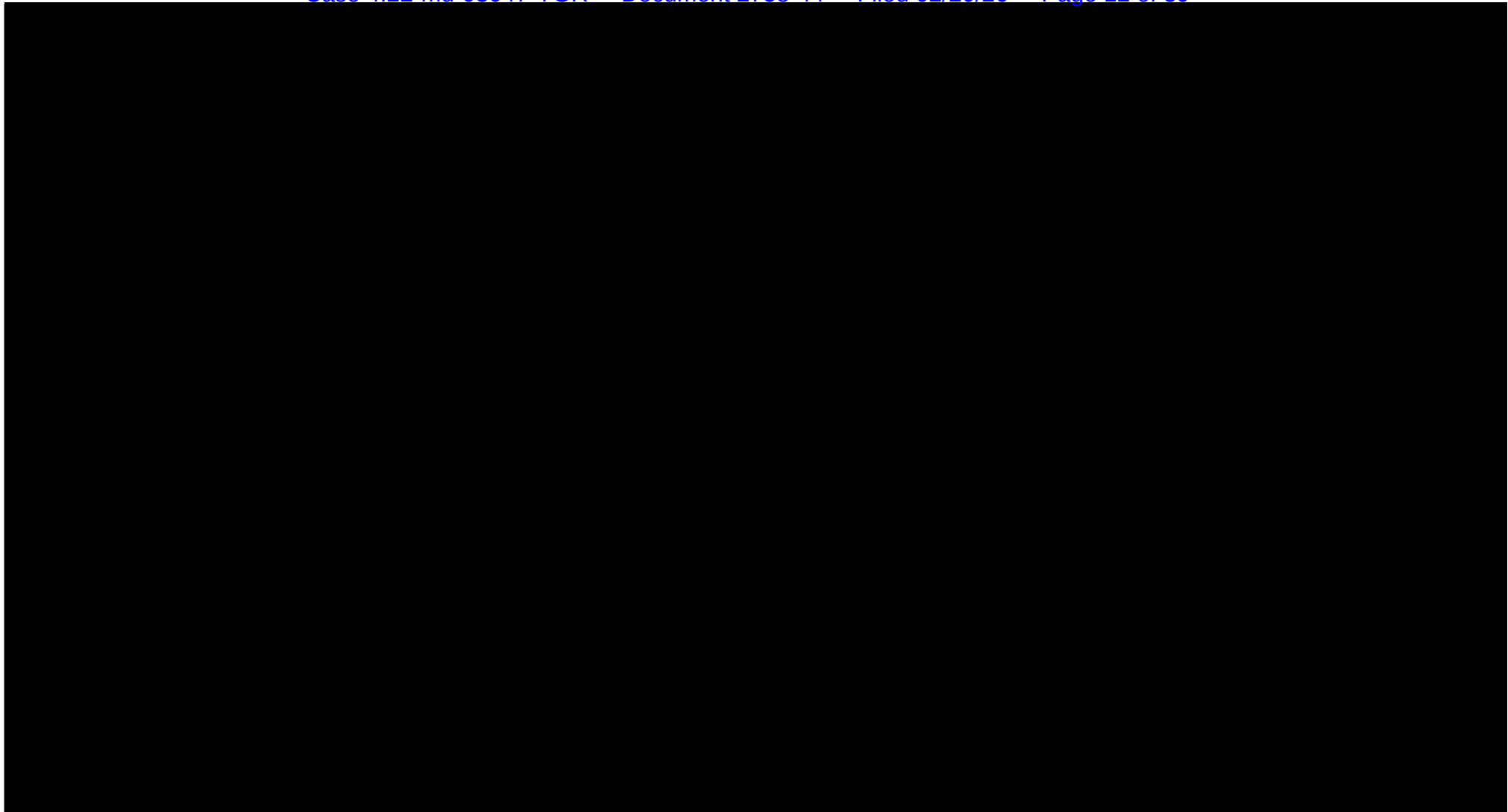
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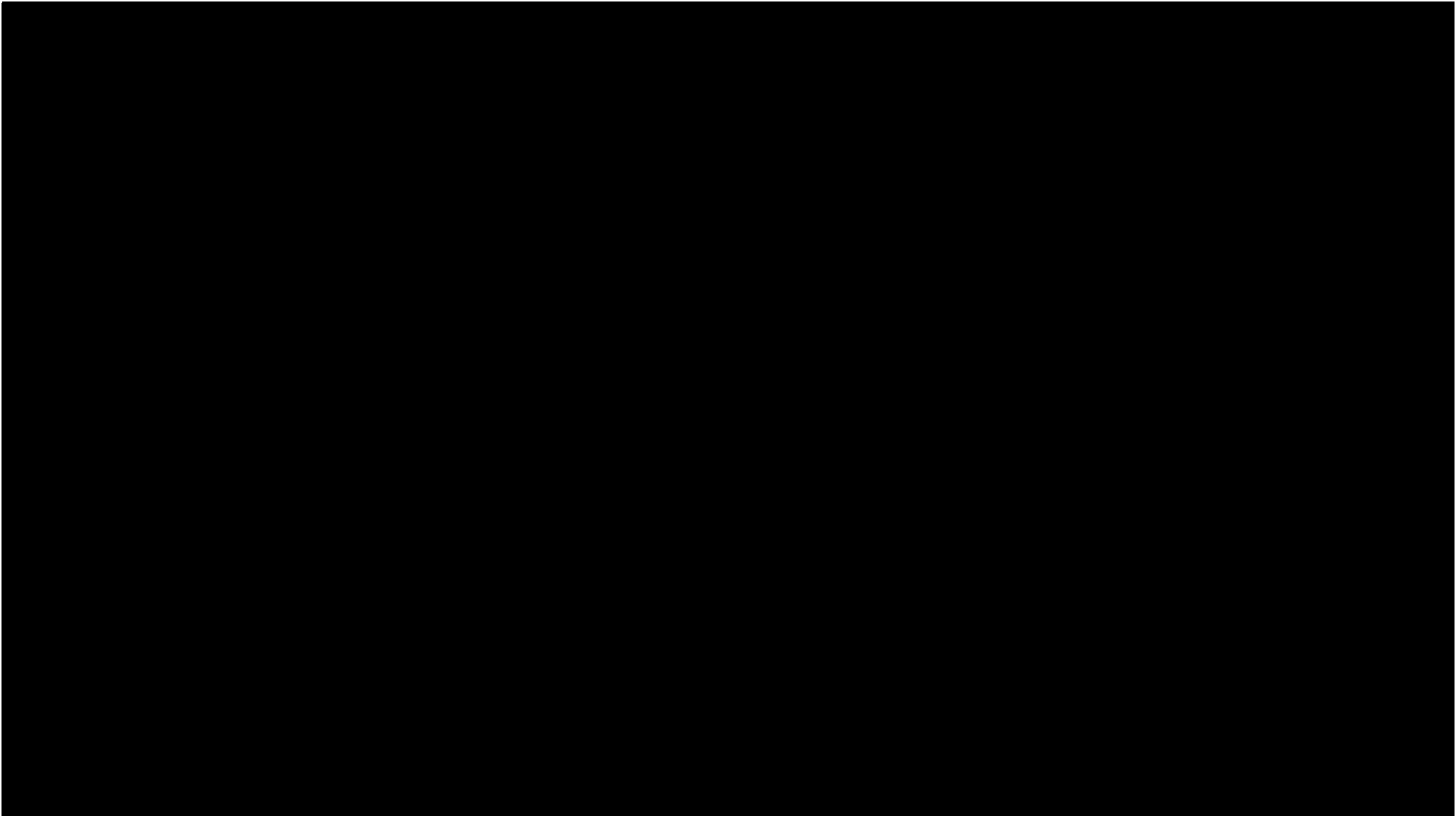
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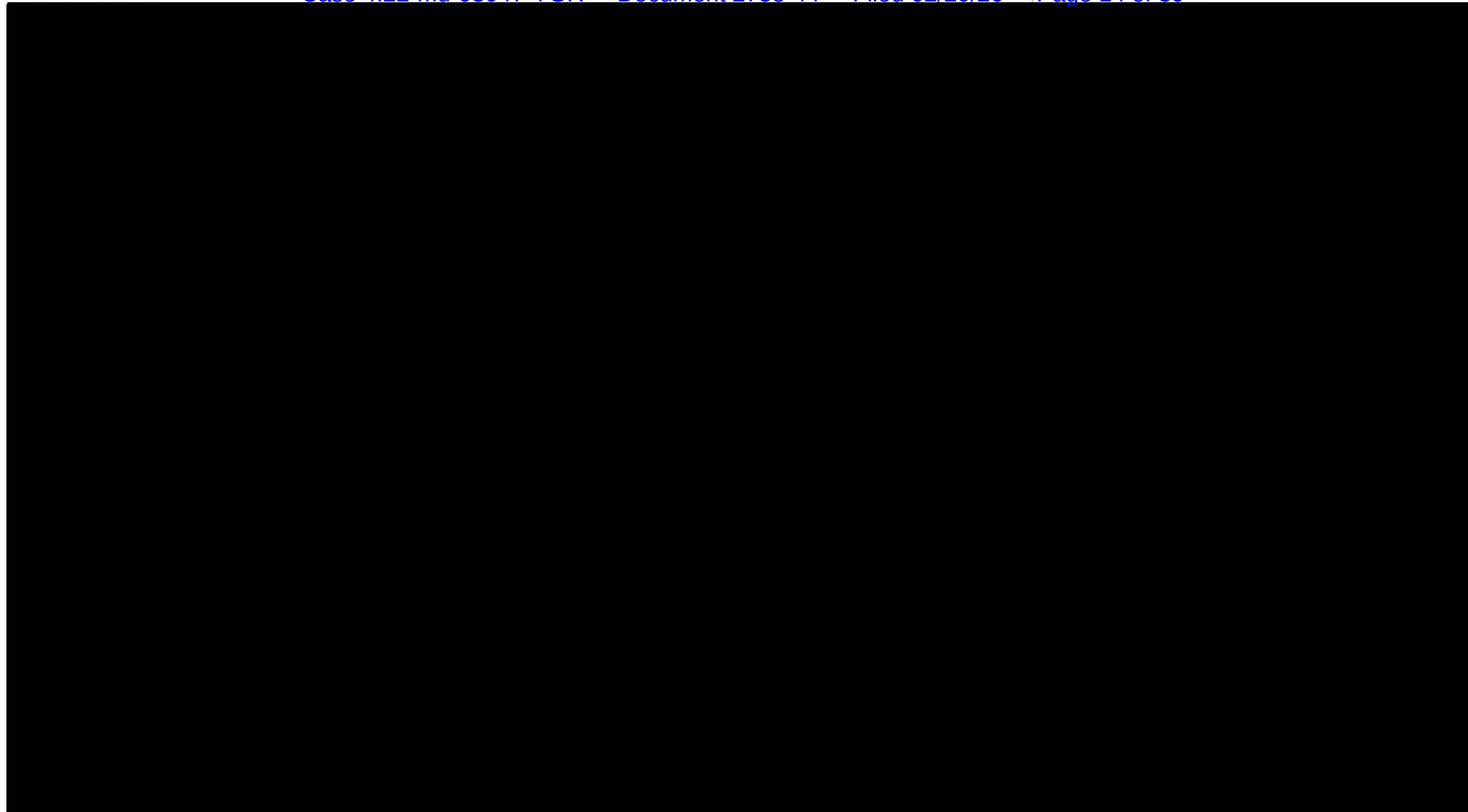
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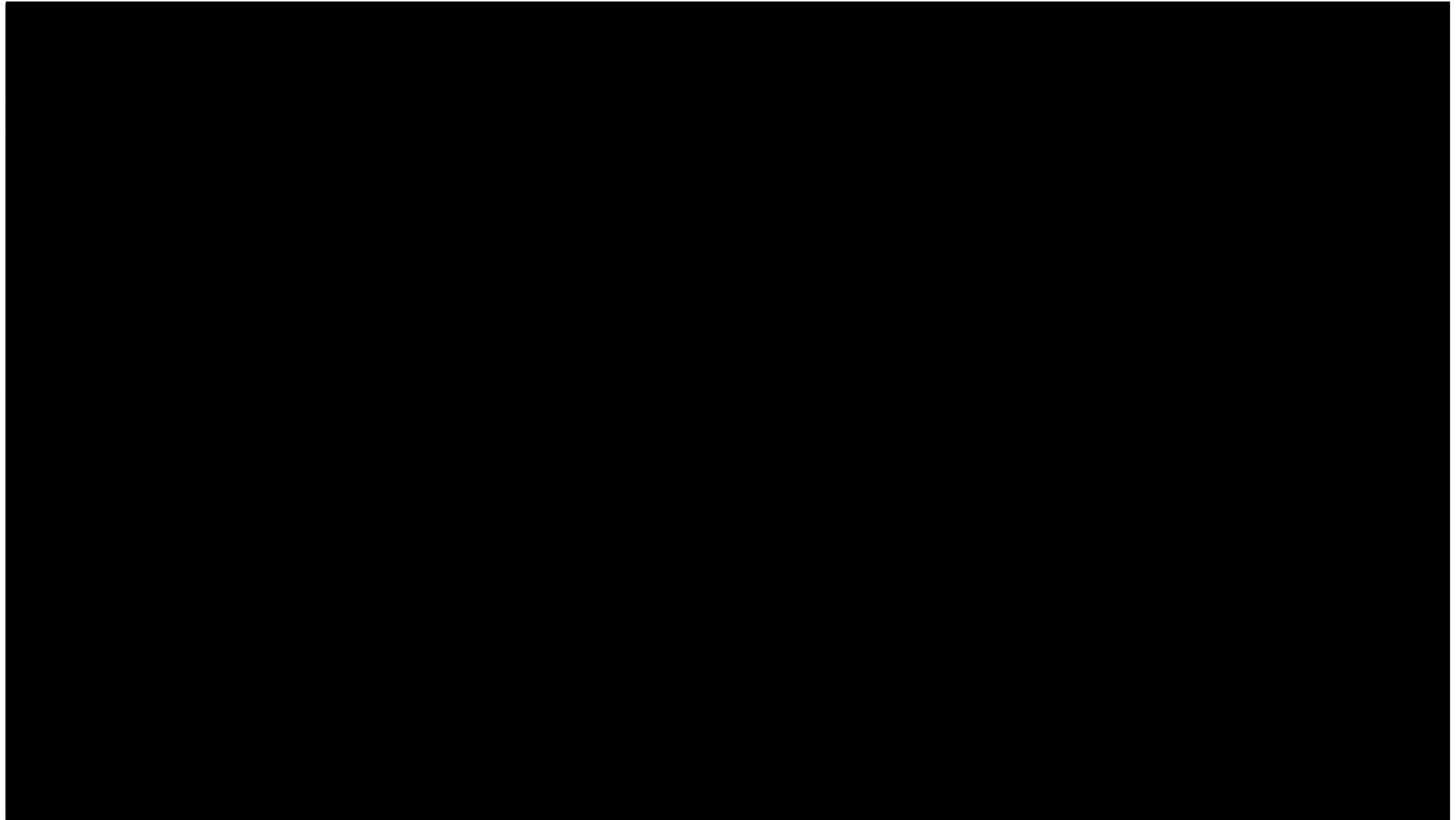
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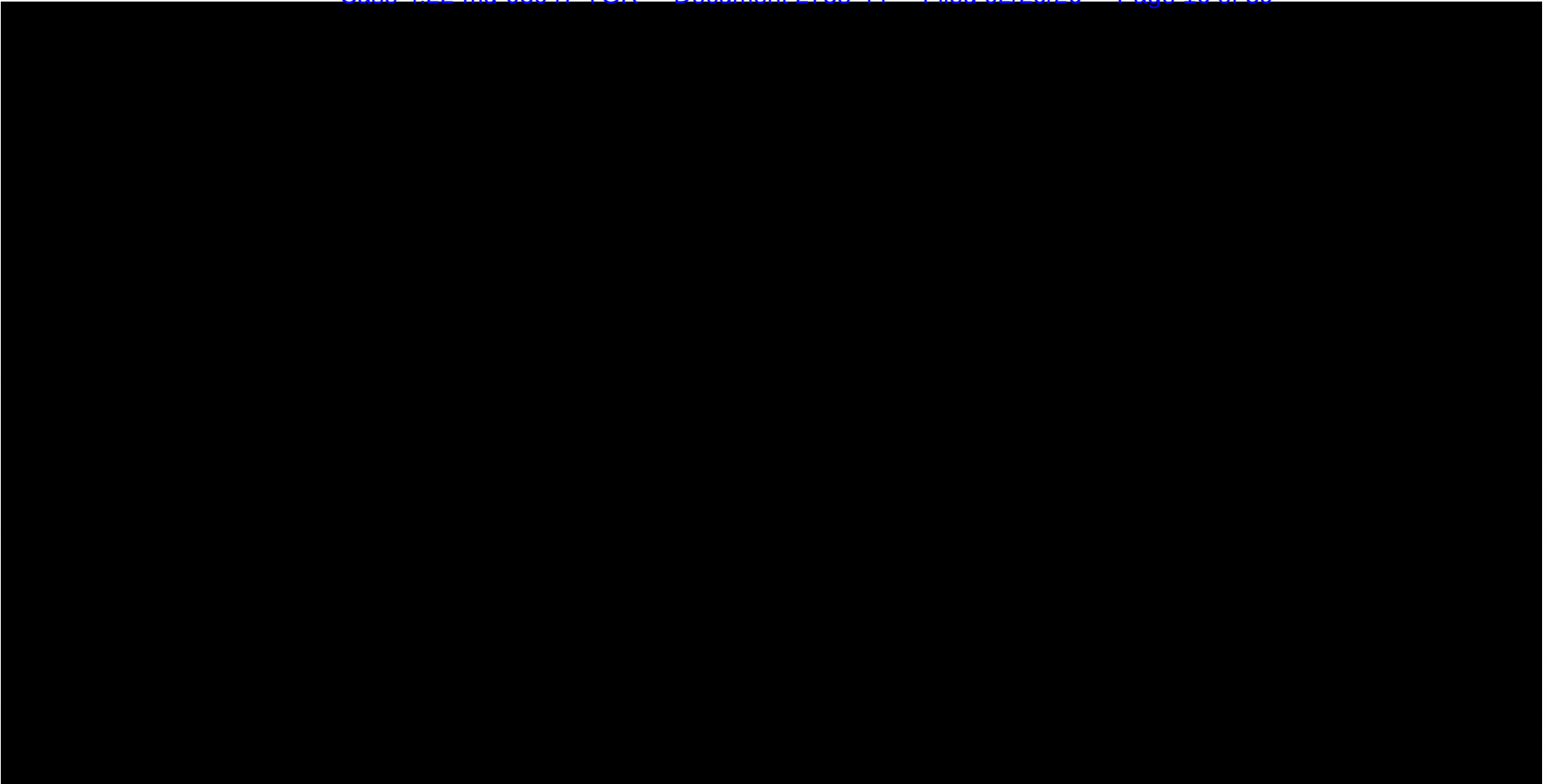
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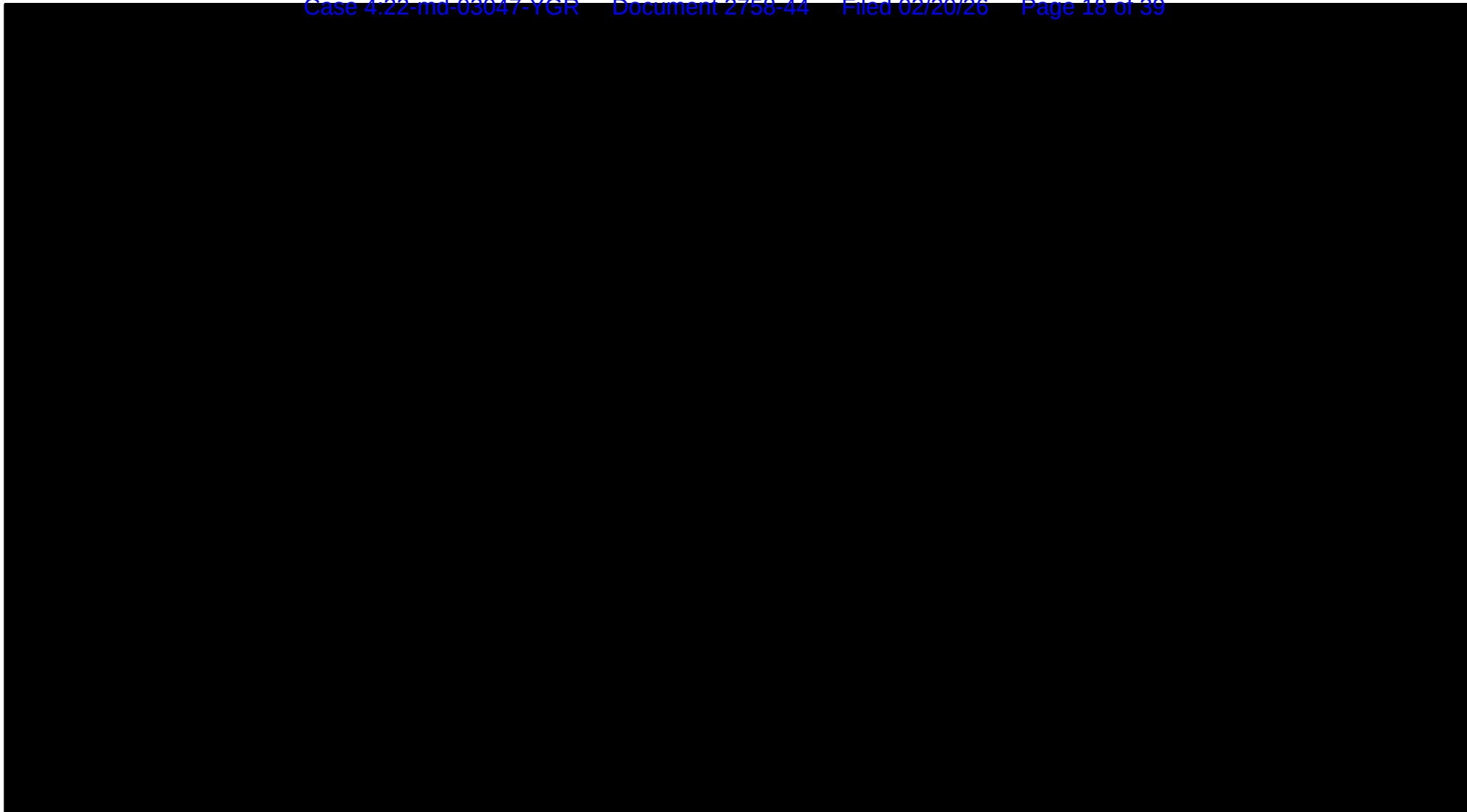
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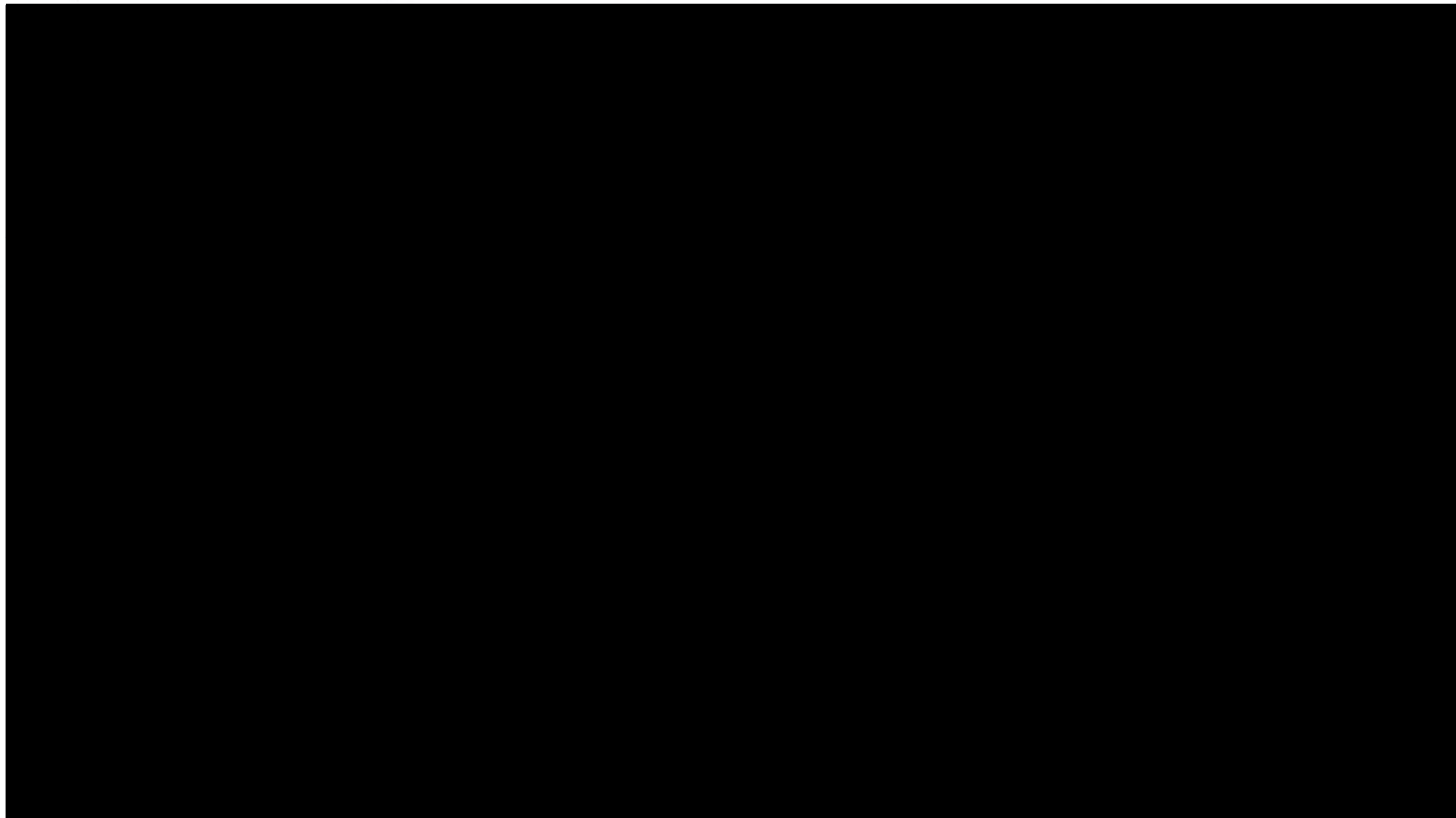
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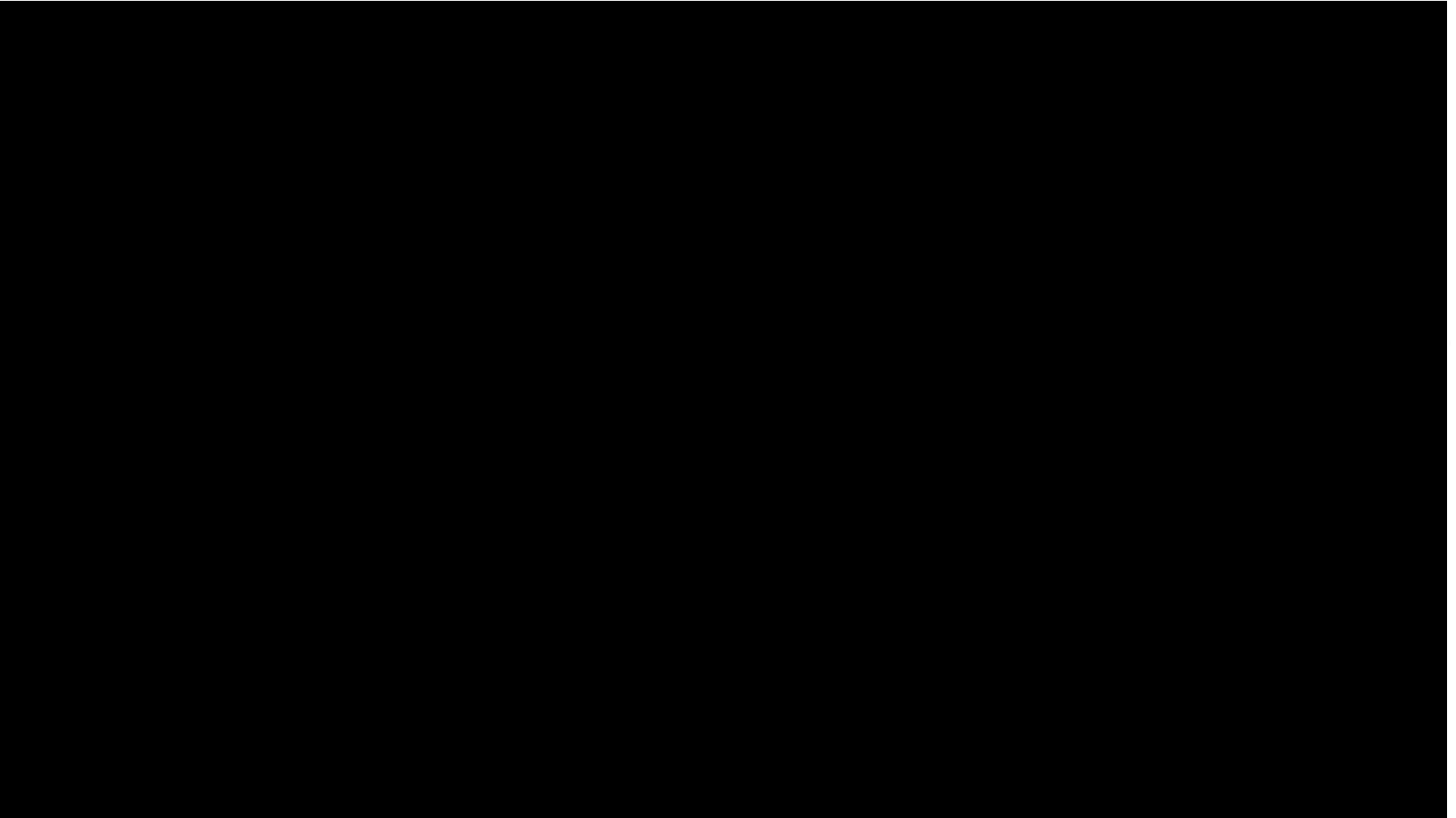
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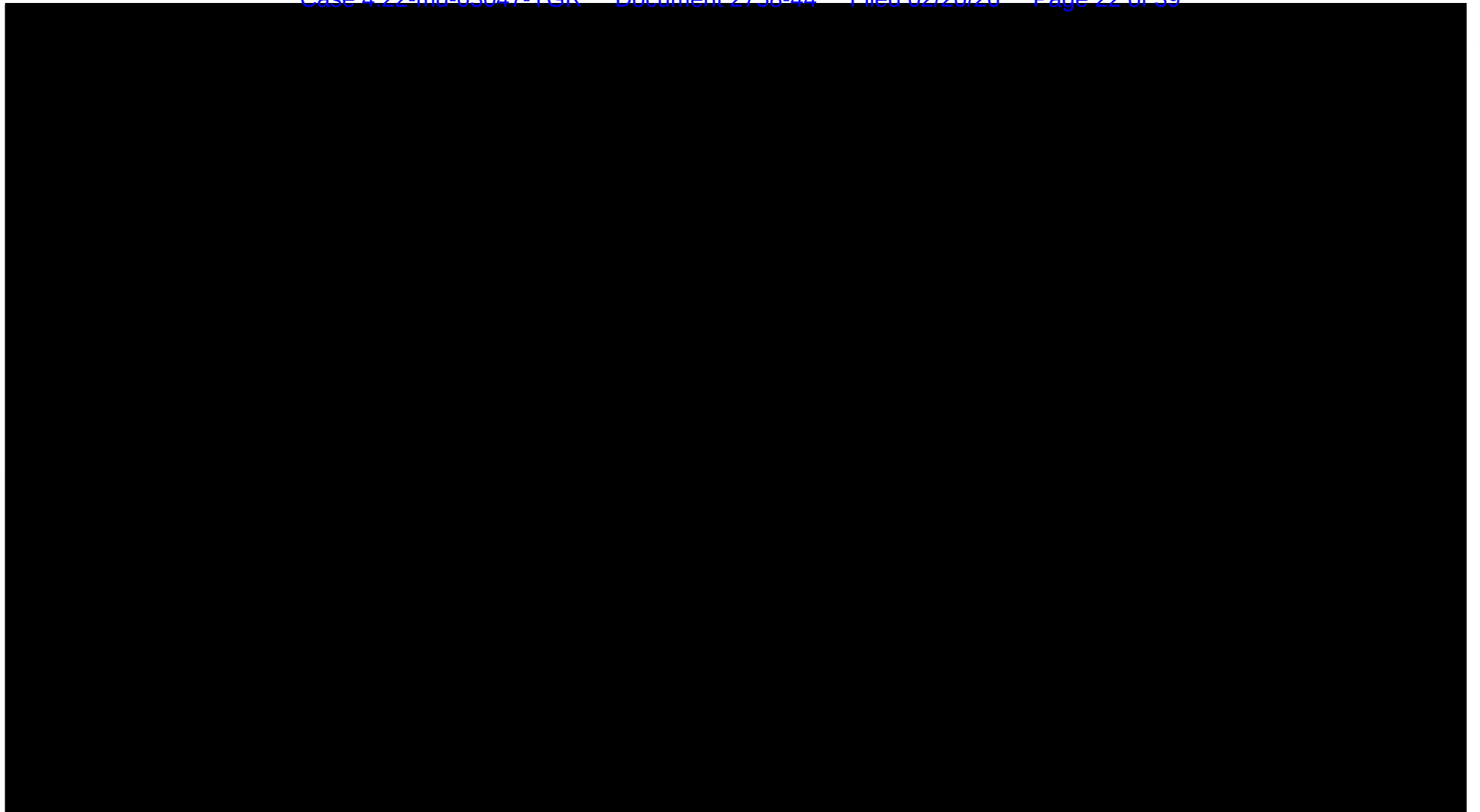
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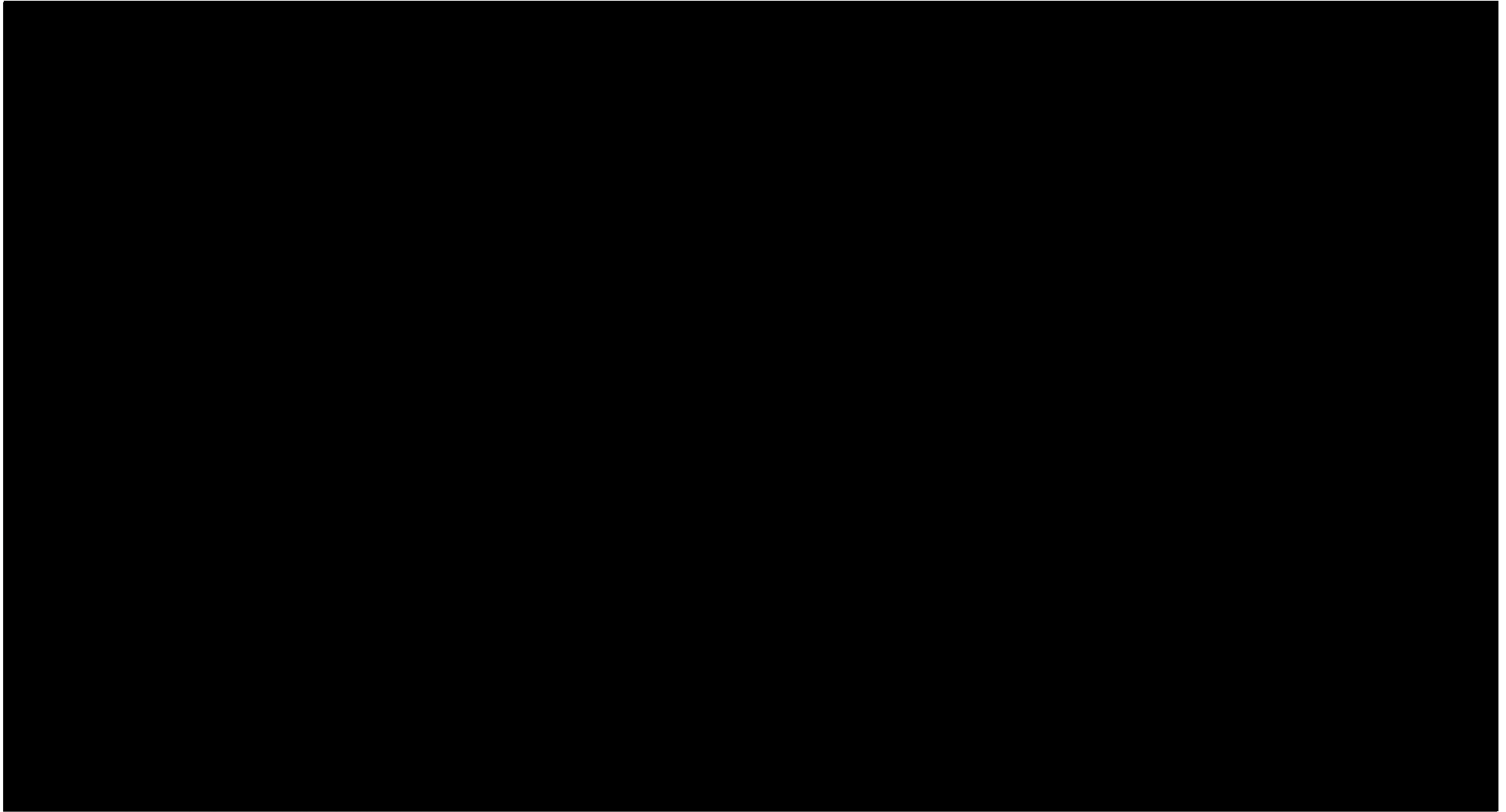
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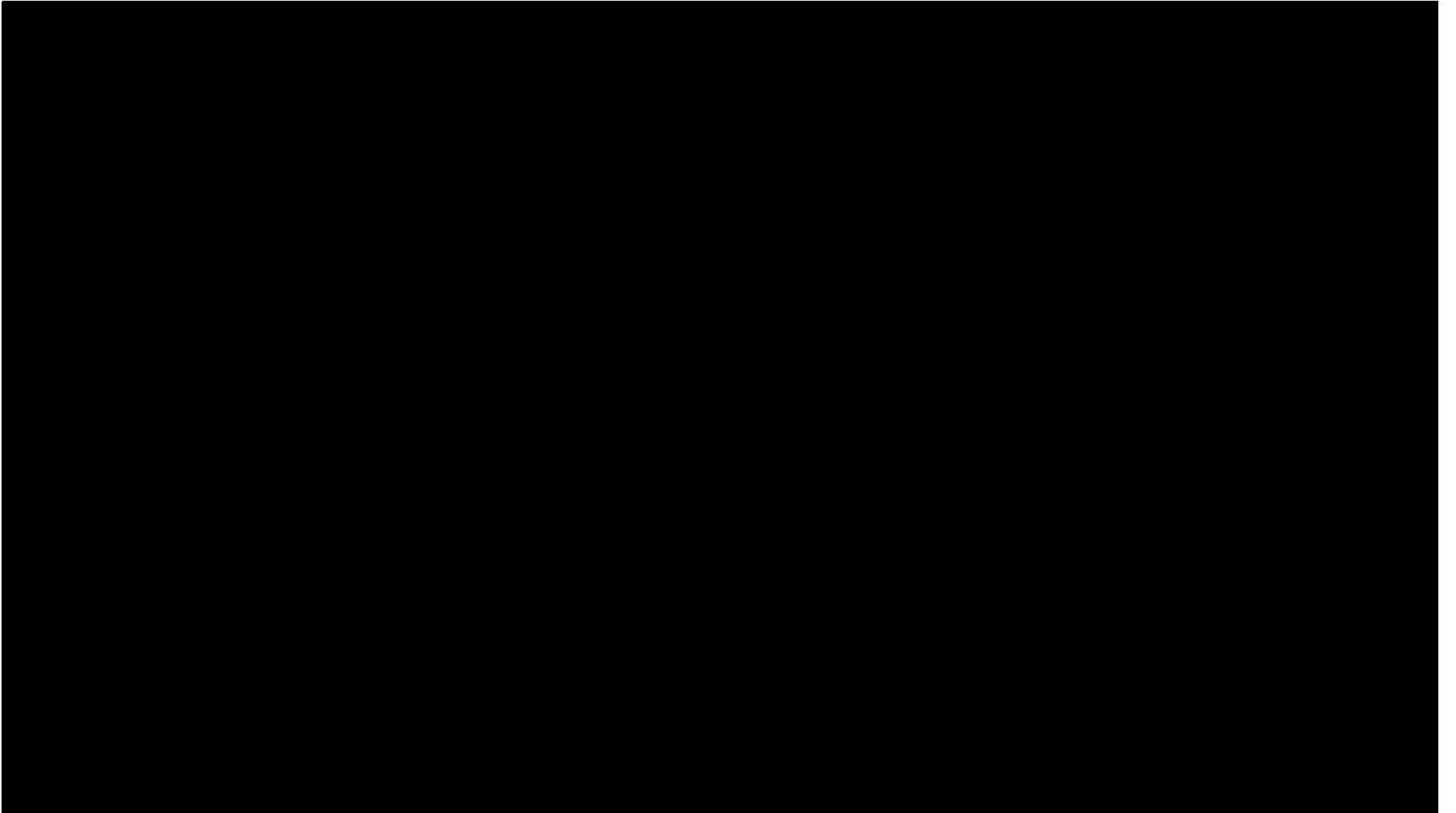
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INSTAGRAM FOCUS

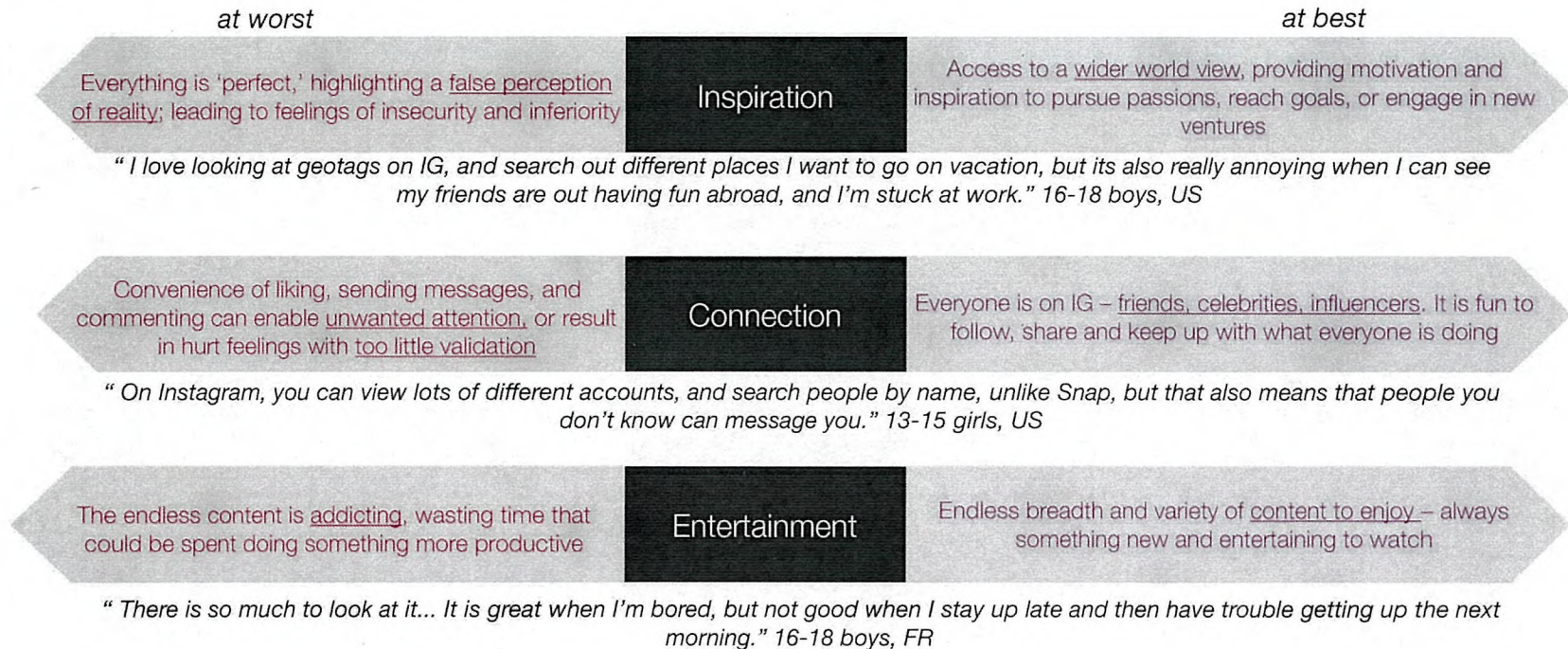
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THE BENEFITS AND DRAWBACKS FOR INSTAGRAM ARE CLOSELY LINKED

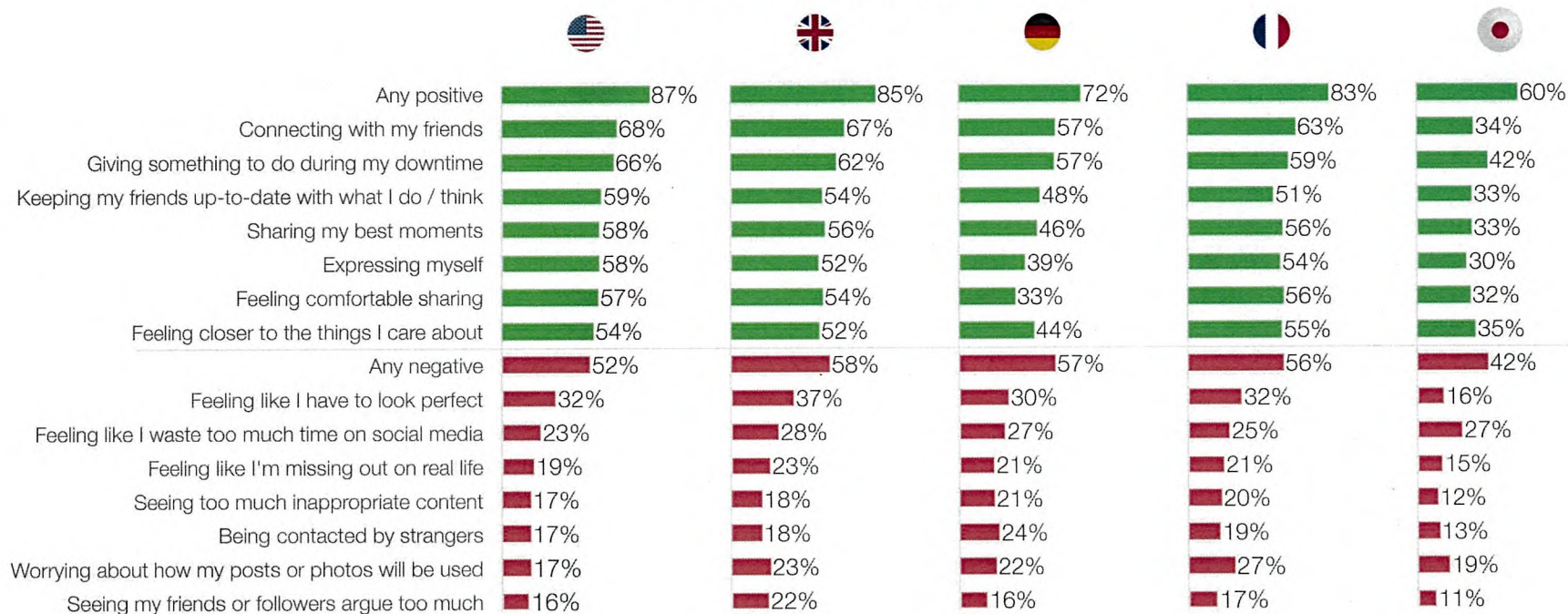
Instagram a part of their lives, and they love it as a destination for inspiration, connection, and entertainment. At the same time, those, these key **benefits** can become key **drawbacks**.



TEENS SAY THEY EXPERIENCE THE POSITIVES OF INSTAGRAM MORE OFTEN THAN ITS NEGATIVES

However, negative experiences occur almost as often as positive ones for teens in Japan

Frequency of Experiences on Instagram
% Often + Very Often Among Teen IG MAP



Q12. How often have you done or experienced each of the following on Instagram?

Base: Monthly Instagram users

US: n=1,000 GB: n=1,000; DE: n=1,000; FR: n=1,000; JP: n=1,002

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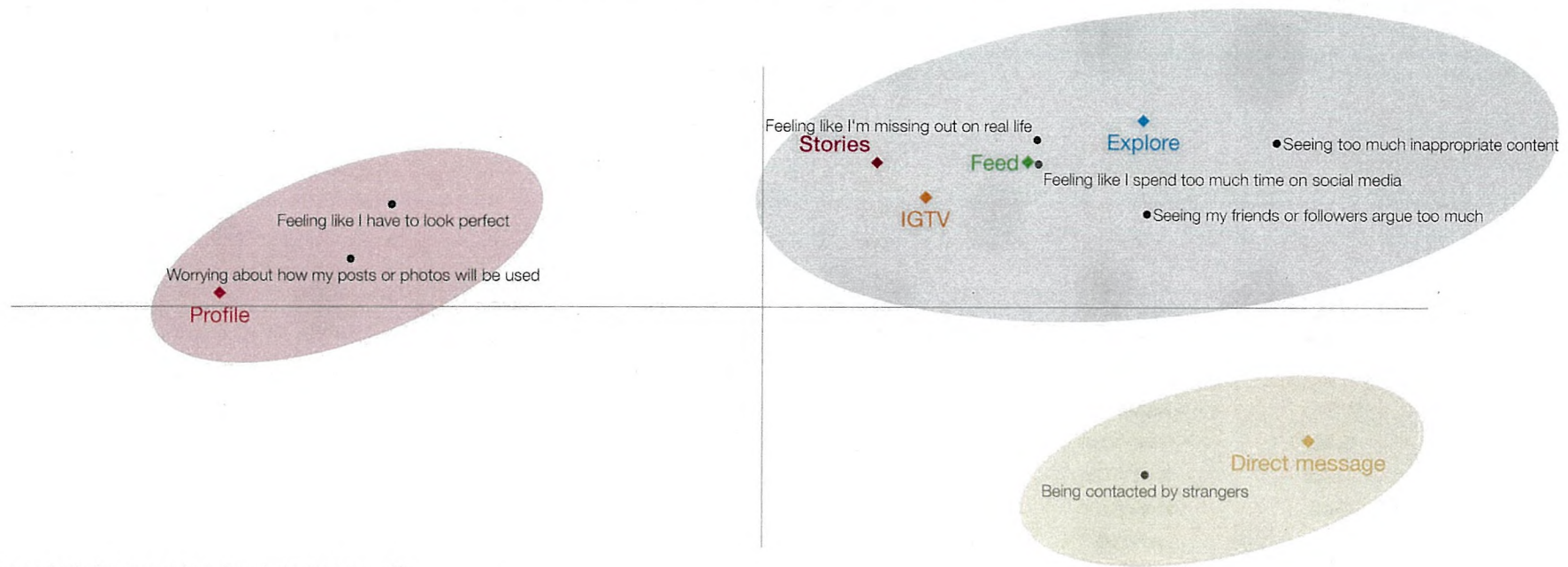
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WHERE NEGATIVE EXPERIENCES OCCUR IN THE APP DEPENDS ON THE TYPE OF ISSUE

Pressure to be perfect and worrying about how your content will be used are most common on teens' profiles
Other issues including FOMO, arguments, inappropriate content, and wasting time are most common on feed

IG Features Where Negative Experiences Occur
Correspondence Map Among Teen IG MAP who have a Negative Experience at Least Occasionally



Q13. Where on the Instagram app have these instances occurred?

Base: Monthly Instagram users who have a negative experience at least occasionally

Data weighted to overall distribution of countries in teen monthly users. Each country produces similar correspondence map.

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AWARENESS OF SAFETY FEATURES IS LIMITED

They are well versed on core IG features, but their knowledge of safety features is limited

- All aware of private account*, and blocking accounts
- And some understanding of reporting, but mostly limited to reporting offensive or inappropriate content (versus SSI reporting)

But, few aware of more advanced tools for reporting, managing comments, or tracking activity on the app

- Few taking time to explore 'your activity' or go deeper into 'report' setting to learn more

Teens report that they aren't always aware when Instagram makes new features available

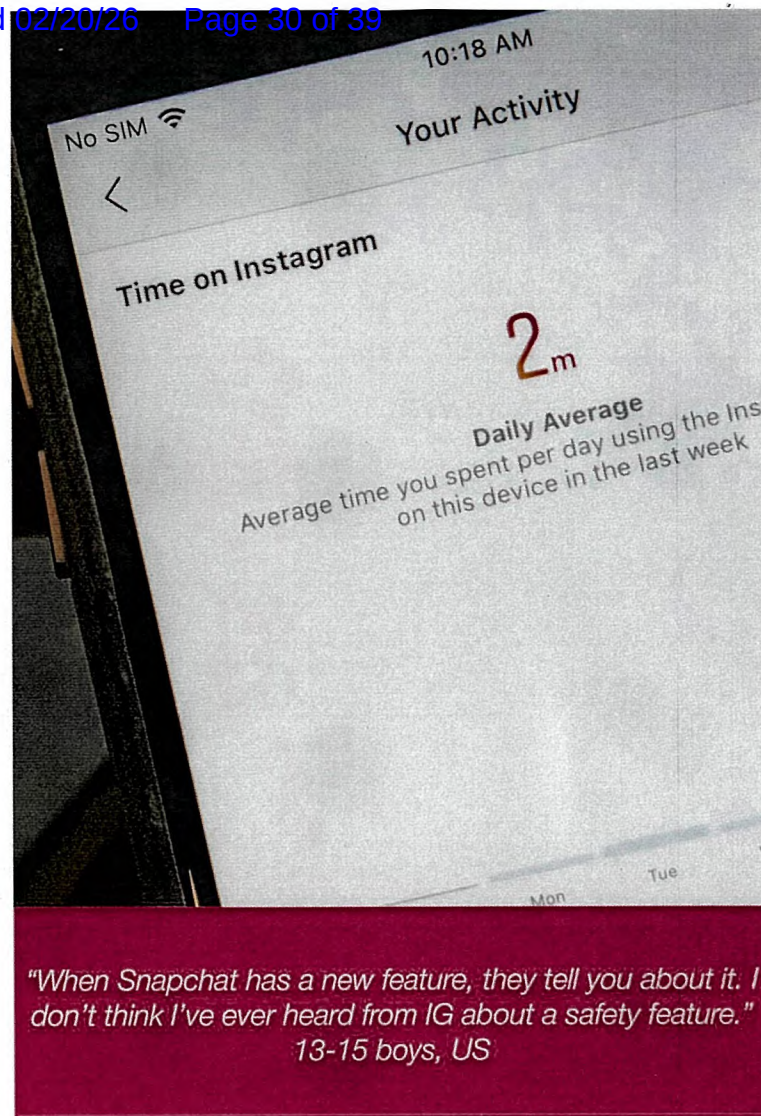
- By comparison, teens feel SnapChat which keeps them informed about each new update

*From [Feature Awareness Tracker](#), at least 80% of teens are aware of private accounts in each market

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THREE WELL KNOWN FEATURES ARE SEEN AS USEFUL FOR MANAGING THE MAJORITY OF NEGATIVE INTERACTIONS ON IG

Private account	Blocking accounts	Reporting
The most effective feature to maintain a positive and controlled IG experience	Helpful to shut down unwanted contact or attention	Useful, a tool to flag fake or upsetting content and have it removed But, some question effectiveness
<i>"If you have a private account, you can prevent a lot of weird and negative stuff from happening." 16-18 boys, FR</i>	<i>"If I get an unwanted message from a creepy older man, I just block him and it's done." 13-15 girls, US</i>	<i>"I have reported stuff on Instagram. I think a lot of people need to report before they take it down." 13-15 boys, US</i>
Top drawbacks addressed		
<ul style="list-style-type: none"> • Stranger Danger / Privacy Concerns • Spam accounts/fake accounts • Bullying 	<ul style="list-style-type: none"> • Stranger Danger / Privacy Concerns • Unwanted attention • Spam accounts/Catfishing • Bullying* 	<ul style="list-style-type: none"> • Spam accounts/fake accounts • Exposure to unwanted content • Bullying*

* It is important to note, however, that teens who have been bullied on Instagram report that blocking accounts and reporting are not always effective tools to combat this issue ([Teen Bullying Deep Dive 2019](#))

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WHILE TEENS COPE WITH THE PERCEIVED NEGATIVITY ON IG, THEY OFTEN DO NOTHING IN RESPONSE TO MORE COMMON ANNOYANCES

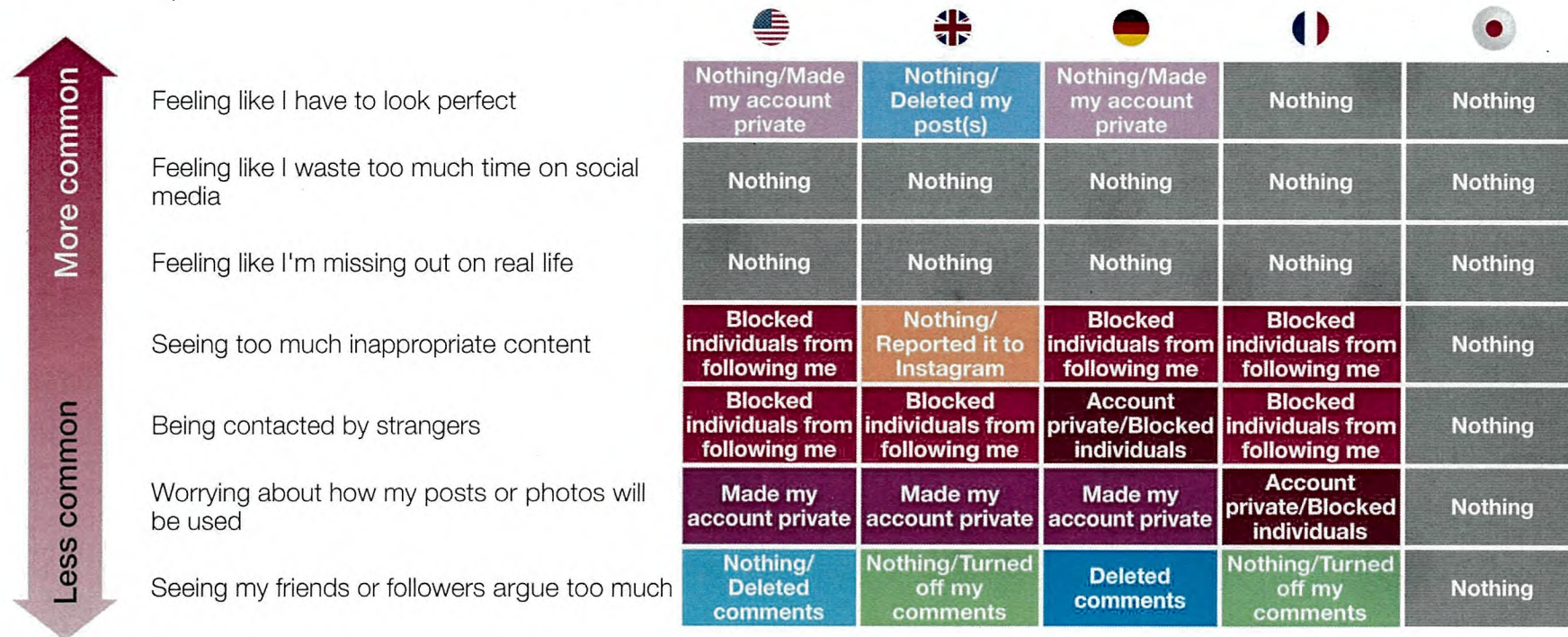
Less common but more severe		More common but more benign		
Privacy & Stranger danger	Bullying	Exposure to fake or inappropriate content	False Reality & Social Comparison	Distraction/ Time Waste
<ul style="list-style-type: none"> Private accounts Block accounts Talk to friends about shared experiences In extreme cases, report to parents or trusted adults <p><i>"It can freak you out a little when you get a message, but then you block them, and it goes away." 13-15 girls, FR</i></p>	<ul style="list-style-type: none"> Nothing Private accounts Block accounts Report to IG but not adult Respond ironically to show it doesn't affect you Share positive comments to those bullied <p><i>"I see it happening, but there is little you can do." 13-15 boys, US</i></p>	<ul style="list-style-type: none"> Private accounts Block fake accounts Report to IG Share offensive videos with friends (that they might find interesting) <p><i>"I saw this one video that was really violent, so I shared it with my friend... I knew he would like it." 13-15 boys, FR</i></p>	<ul style="list-style-type: none"> Usually nothing Remind themselves that not everything on IG is real Turn to Snap for casual sharing Use filters / photo apps to enhance pictures <p><i>"You can't really do anything about it... Everyone posts perfect moments on IG." 16-18 boys, US</i></p>	<ul style="list-style-type: none"> Nothing Some take a break from social media Some try to turn off phone for a bit <p><i>"I will try and put my phone away when I'm at dinner with my family." 13-15 girls, US</i></p>

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HOW TEENS RESPOND TO NEGATIVE EXPERIENCES ON INSTAGRAM DIFFERS BY THE EXPERIENCE

Many teens do nothing in response to the problems they face on Instagram, especially in Japan

Most Common Action Taken in Response to Issues on IG
% Selected Among Teen IG MAP who have a Negative Experience at Least Occasionally



Q14. Which of the following have you done in response to these instances?

Base: Monthly Instagram users who have a negative experience at least occasionally

US: n=322-484; UK: n = 384-593; DE: n=385-553; JP: n = 237-510

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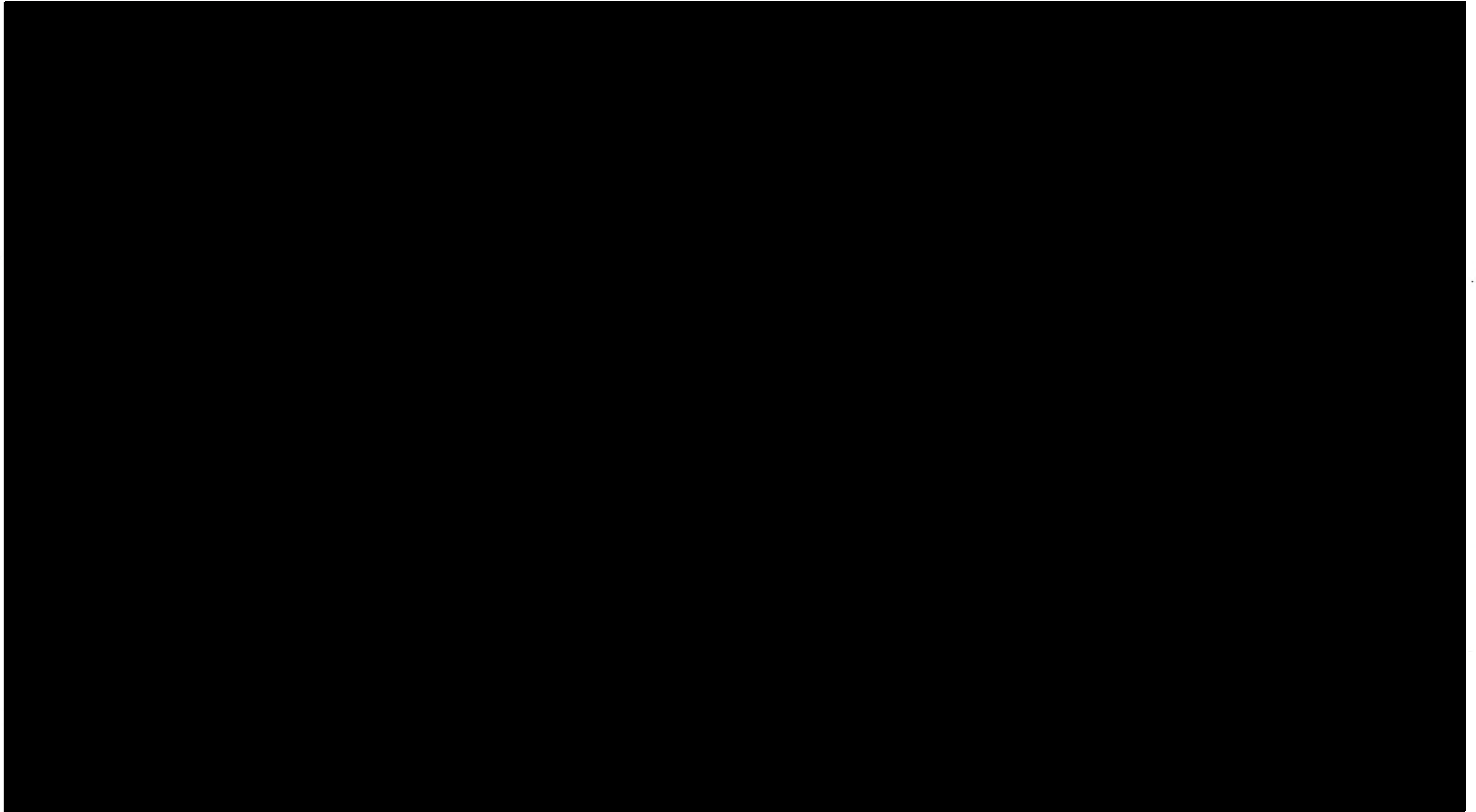
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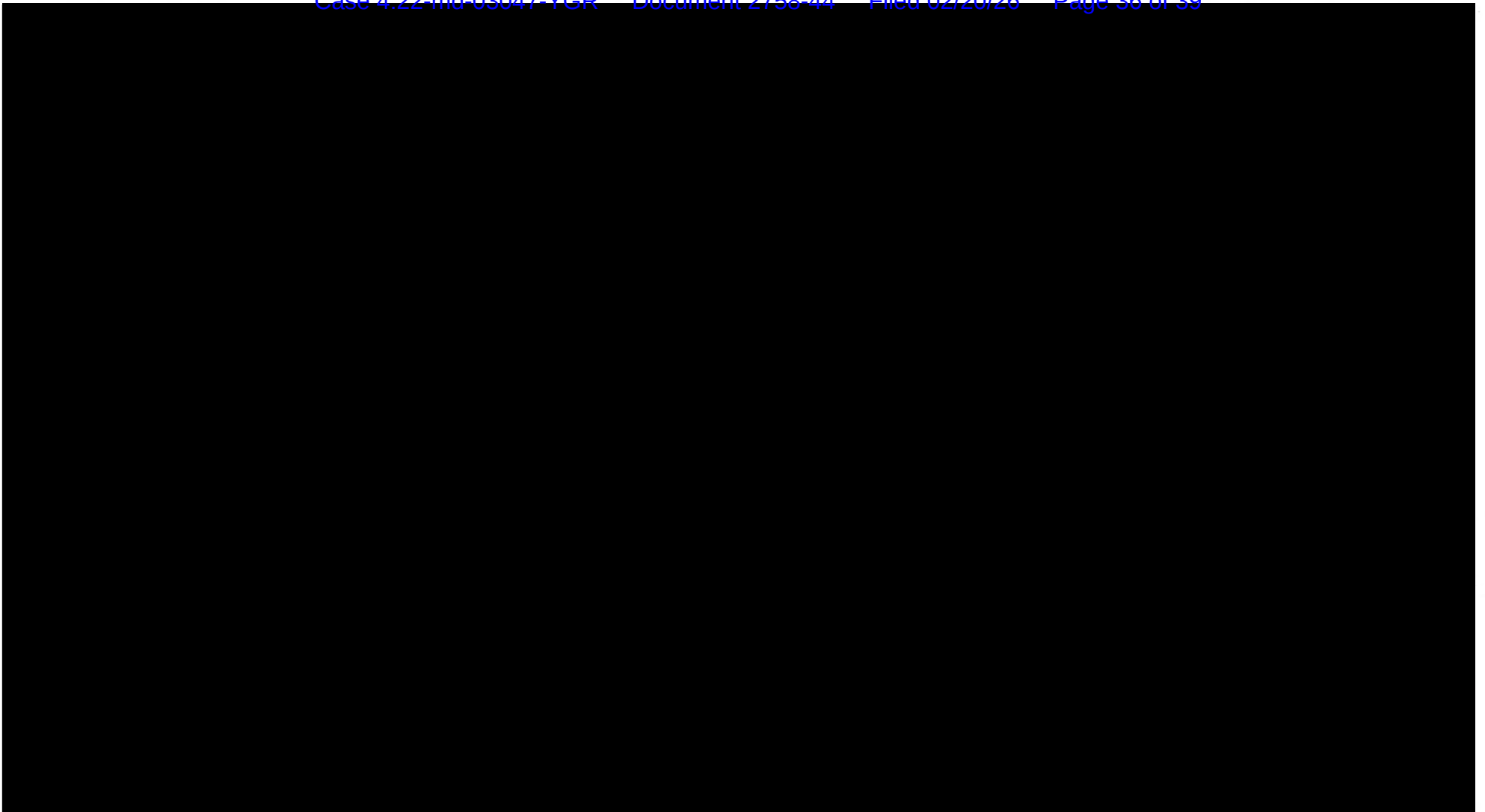
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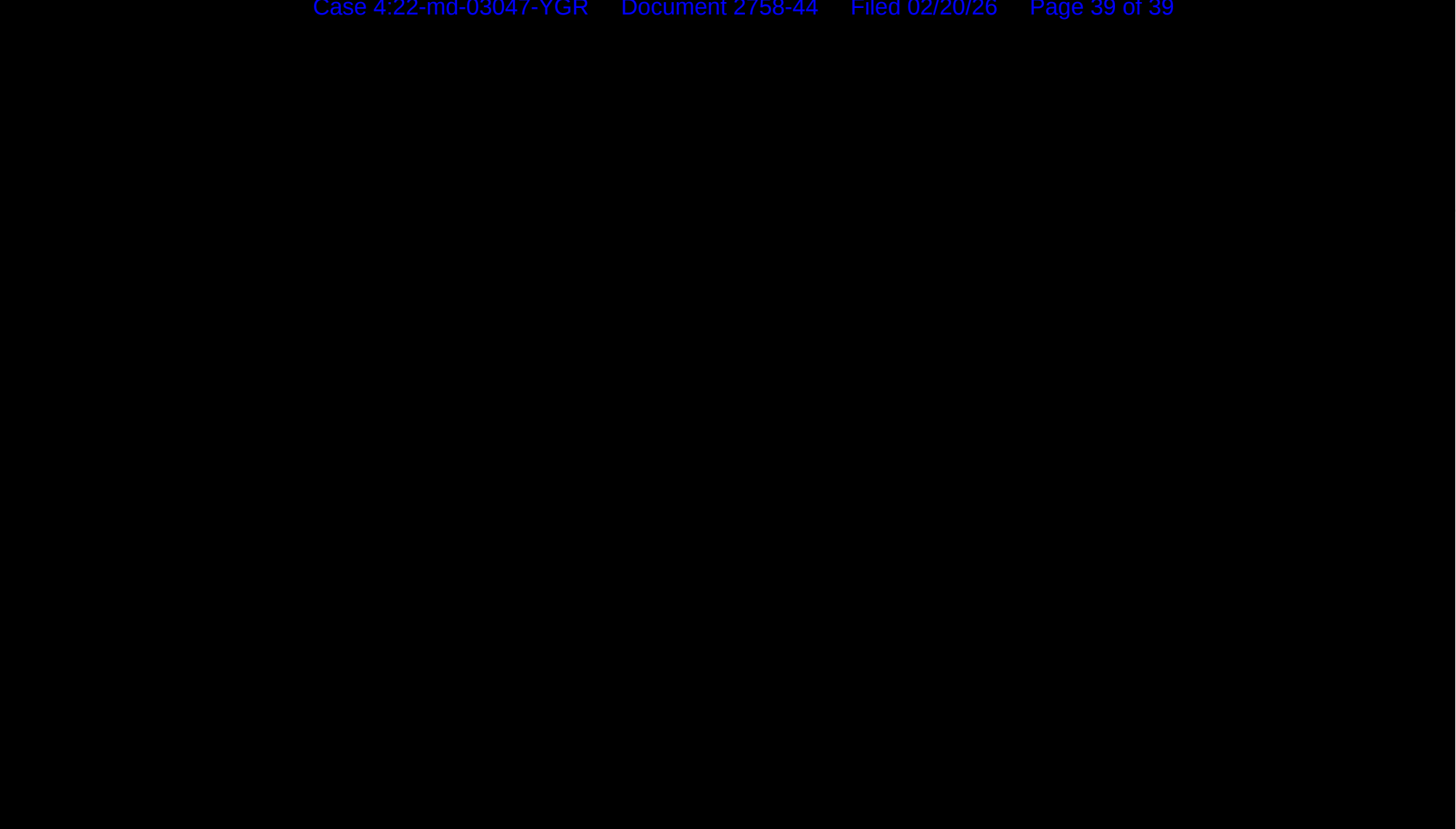
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