

AMENDED Exhibit 248

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 WELL-BEING

Preference Amplification & Concentration of Harm



- Goals**
- 1 Align on people problems & prioritization**
 - 2 Align on success metrics**
 - 3 Discussion questions**

People Problems

Problem Prioritization

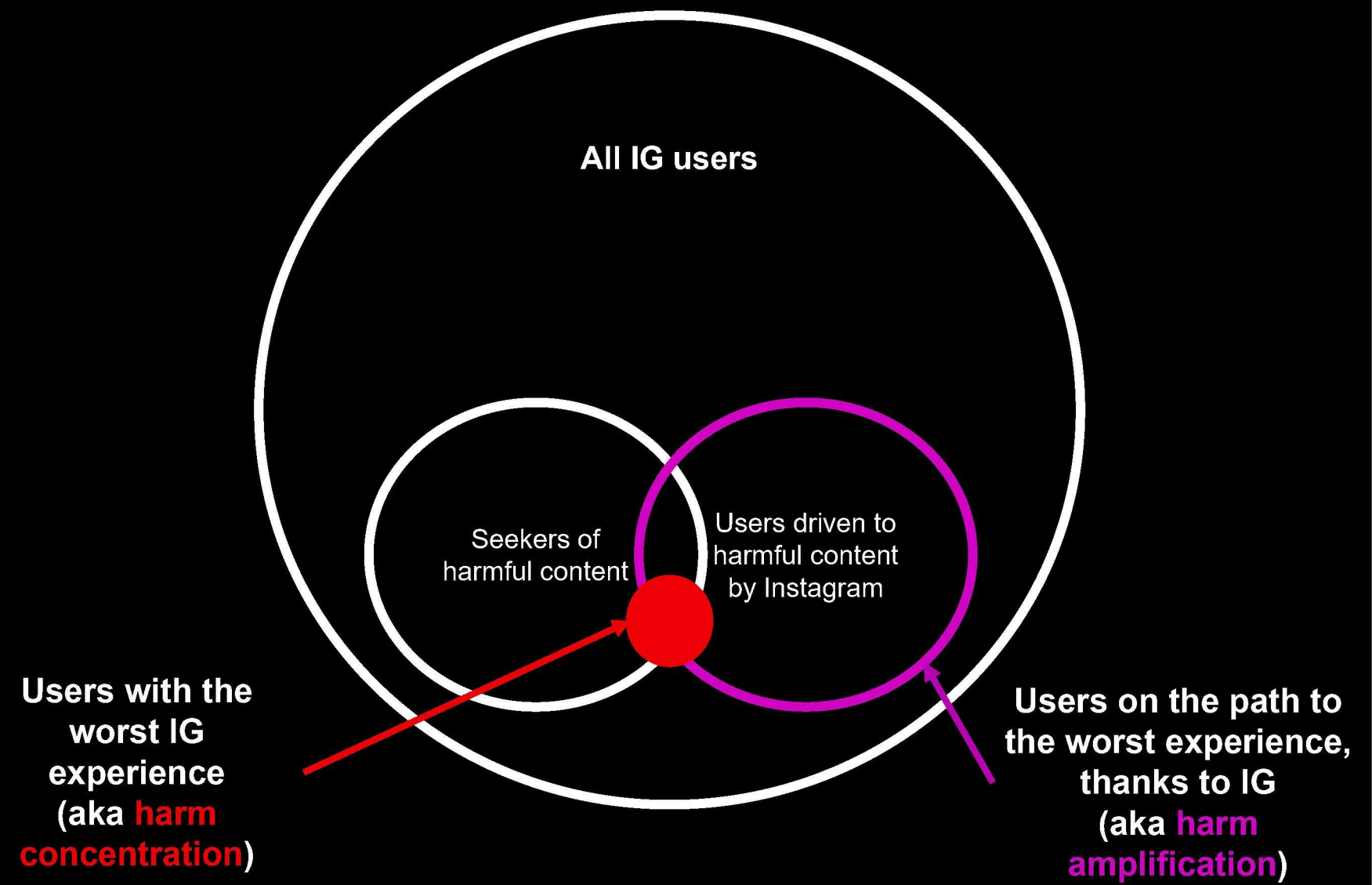
Success metrics

Discussion

Product Strategy [not in scope]

PEOPLE PROBLEMS

How does harm manifest in our users?

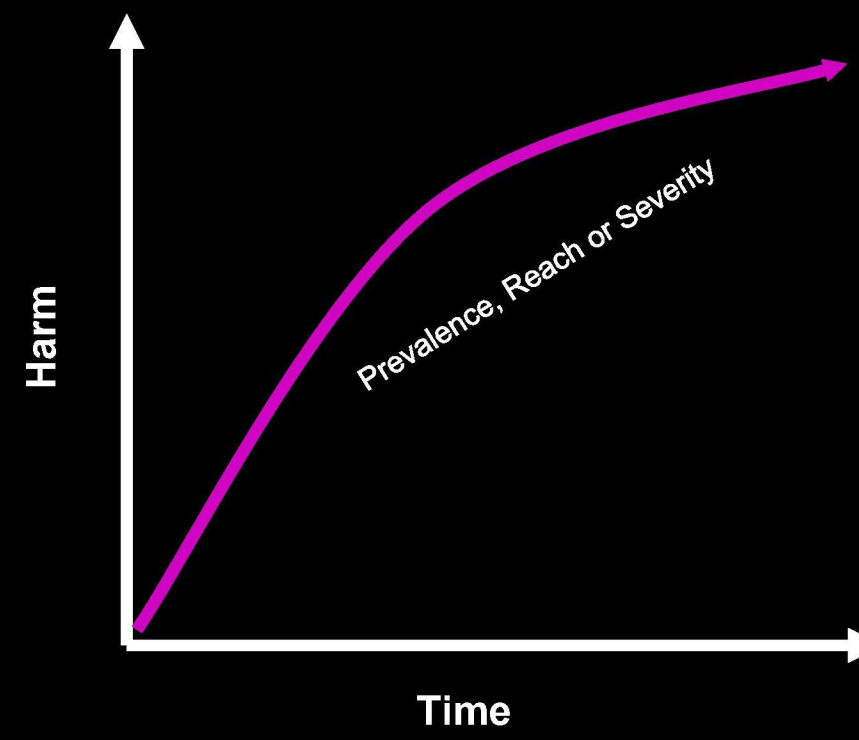


PEOPLE PROBLEMS

Preference Amplification = a user experiencing an increase in [harmful] content over time

Harm =

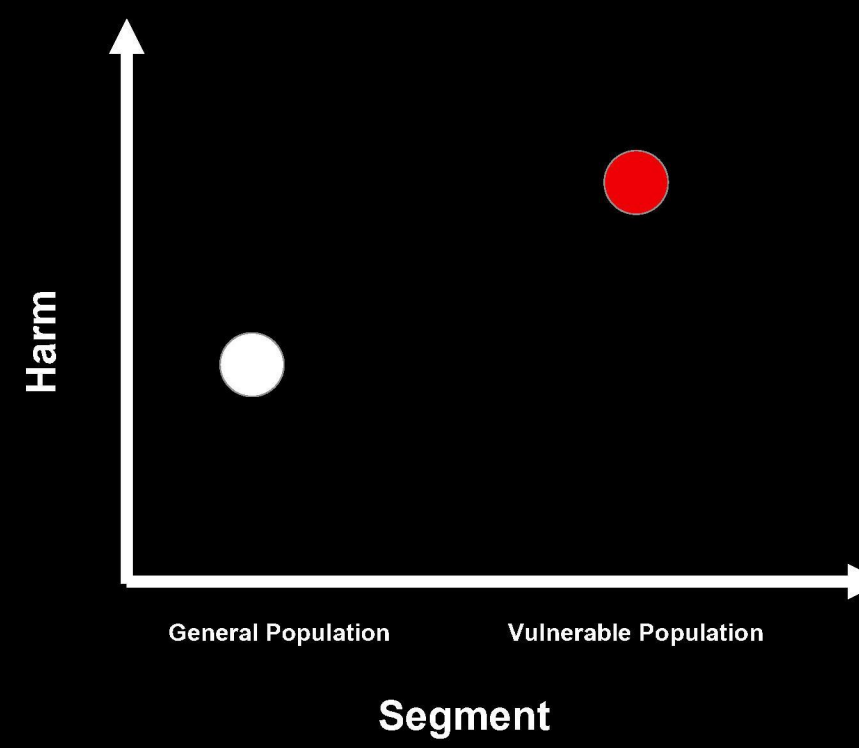
- **Prevalence:** e.g Going from seeing 1 violating content today to 10 in the near future
- **Severity:** e.g Going from Hunting (does not violate any policies) -> Guns (non-rec) -> Violence (community violating).
[CIPCO severity framework](#)
- **Reach:** e.g Connected to 1 bad actor today to 10 bad actors in the near future



Preference Amplification is the *process* by which a user 'rabbit-holes' into a certain type of content. The process may or may not be driven by intentful user actions. PA can happen for any content, but we're focused on *harmful* content. PA is mostly associated with Unconnected/Recommendation surfaces.

PEOPLE PROBLEMS

Concentration of Harm = a user with a high prevalence of harmful content vs the average Instagram user

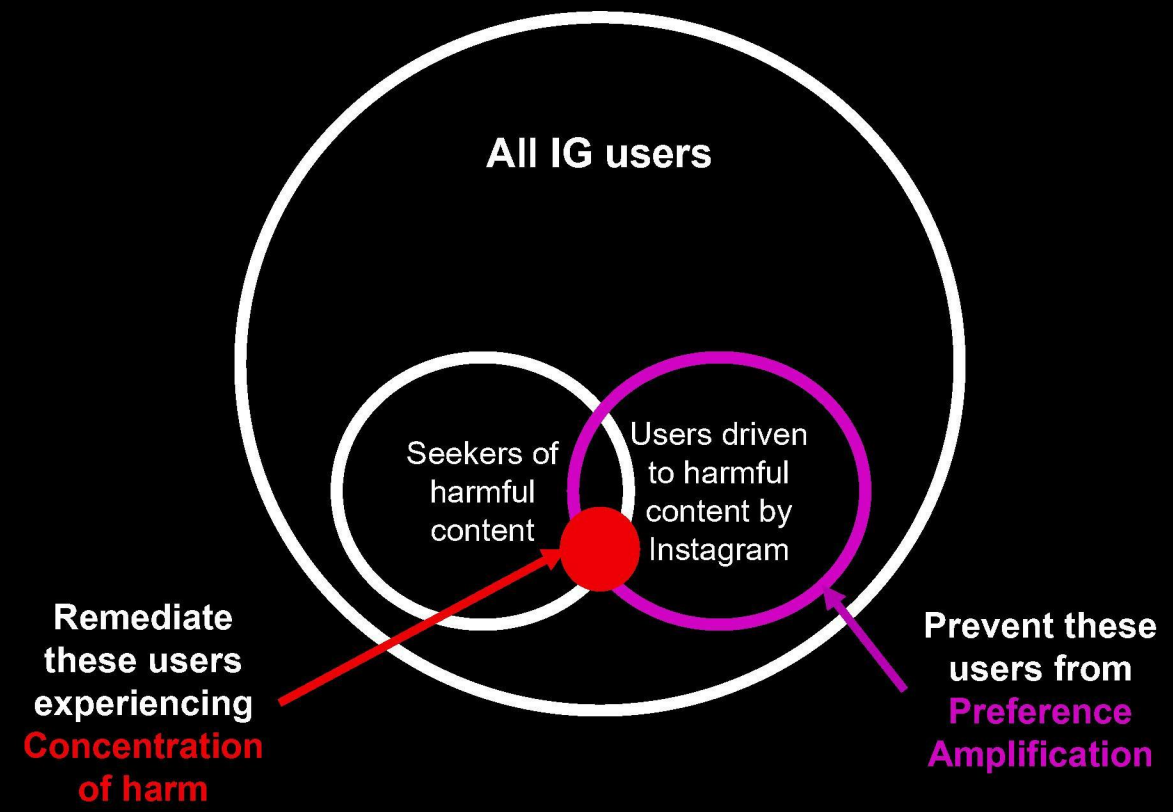


Concentration of harm is the *situation* when a user is already facing a significantly higher prevalence of harmful content in their Instagram experience, either with or without intent. It does not matter whether this harm is increasing over time. CH can happen on Connected or Unconnected surfaces

PEOPLE PROBLEMS

Mission & Vision:

Instagram needs to **prevent** users from preference amplification and **remediate** users who are experiencing concentration of harm, while respecting their intent and giving them the agency to control their experience.



PROBLEM PRIORITIZATION

Who are our target users & how do we classify them?

	Low intent <i>(more likely to not want to see bad content)</i>	High intent <i>(more likely to seek out and welcome exposure to bad content)</i>
	Includes ‘Cold-start’	
Teens (& parents/regulators)	<i>I might have engaged with a few influencer modeling pictures and now my IG is full of lingerie models</i> <i>Parents/Regulators: It is IG’s responsibility to protect teens from harmful content</i>	<i>I actively seek out pornographic/drug related content and have my IG experience catered to my needs</i> <i>Parents/Regulators: It is IG’s responsibility to protect teens from harmful content</i>
Genpop	<i>I might have engaged with a couple of influencer modeling pictures and now my IG is full of lingerie models.</i> <i>IG can help by preventing me from this situation OR helping me ‘clean up’ my experience</i>	<i>I actively seek out “alternative” news and have my Instagram experience catered to my needs.</i> <i>I do not want IG to actively interfere with my experience.</i>

Note: Why do we care about intent? See Appendix

