

AMENDED Exhibit 314

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 Provided in Native Format

EARLY TEEN ILLUMINATION QUALITATIVE RESEARCH

- Full Summary
- December 4, 2017

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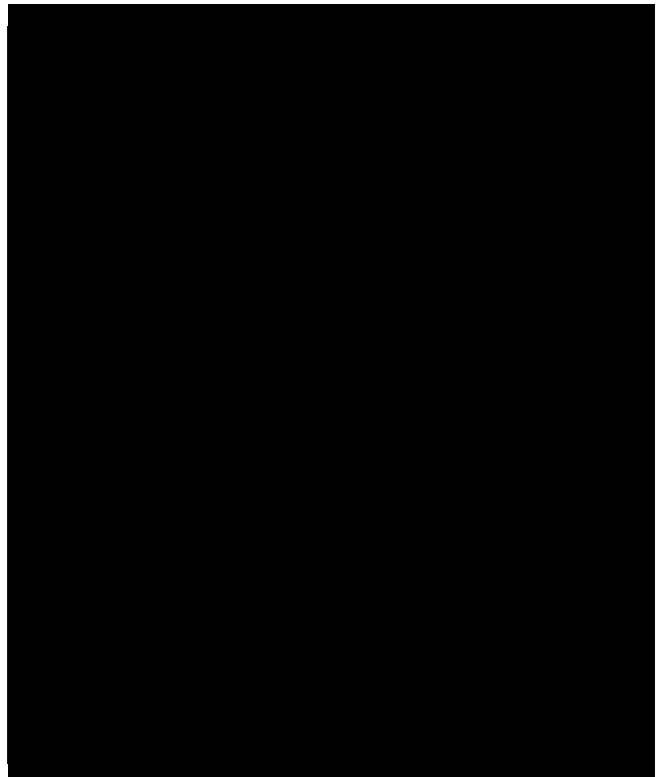
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EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

- It's a **small world** - activity and thinking are school and home-life centric
- Early teens progress thru **three phases**: 11-12yo are humor-hungry, 13yo indulge in the paradox and drama of life, and 14-15yo are on an identity quest.
- **Two major shifts at age 13**: 1) The door to the external world opens; 2) Self-led curiosity and discovery become driving forces
- **Top struggles**: 1) Developing confidence & feeling secure; 2) Non-familial relationships; 3) Creating self-identity; 4) Scheduling imbalance (11-12yo bored; 13-15-year-olds over-programmed)

EXECUTIVE SUMMARY CONT'D

- **Social media and IRL moments** are equal sources for understanding what's new/on-trend
- **NOW**= two things, both of which matter and IG only supports one. 1) NOW= external news and trends (IG owns); 2) NOW= what my friends/peers are doing at this moment (SC/WA owns).

Friend/peer now-ness is IG Achilles' heel - IG significantly weakened by early teen judgment and unwritten rule of "less is more". IG now-ness propped up by top accounts

- #1 IG **barrier**, caused by #1 Teen tension— Confidence. Fighting thru hormones, peer judgment, a need to fit in and pressure to impress boys/girls— all while identity questing.
- IG **opportunities**: 1) Keep the Attention— interactivity + relevance; 2) Be a Place of comfort/acceptance— more teen stuff & less judgy comments; 3) YouTube product parity— relevant auto-video/content experience trends.

BACKGROUND AND METHODOLOGY

OBJECTIVE

Understand early teens and create illumination foundation. Foundation that will inspire high impact marketing messages and campaigns that drive Instagram platform production and engagement and bring in new users

TARGET

Early teens ages 11-15, mix of gender and IG usage or interest

METHODOLOGY

- Ethnographies, in-home friends parties, focus groups, pre-session homework including deprivation exercise
- Markets: US (LA and Chicago), UK (London), Brazil (Porto Alegre, Recife)
- Total of 220 early teens

*Learnings apply to all countries unless noted

*No IG-specific questions asked among A11-12

EARLY TEEN LIFESTYLE

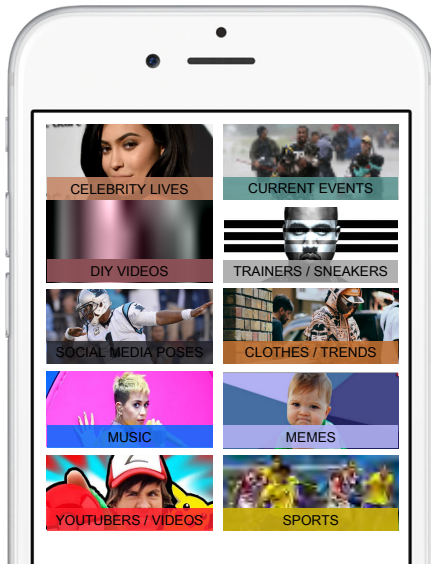
DAILY HIGHS AND WHAT'S
COOL

HIGHS OF THE DAY



WHAT'S COOL

10 'HOT TOPIC' AREAS:



INFORMATION SOURCES: SURROUNDED BY SOURCES (360°)

Social Media Apps

- Instagram, Snapchat, YouTube (posts, comments, celebs)

IRL school and friends' houses

- Peer talk, observing in the halls

Other apps

- Sky sports, BuzzFeed, CNN, Daily Mail, BBC News, ABC, TMZ

“

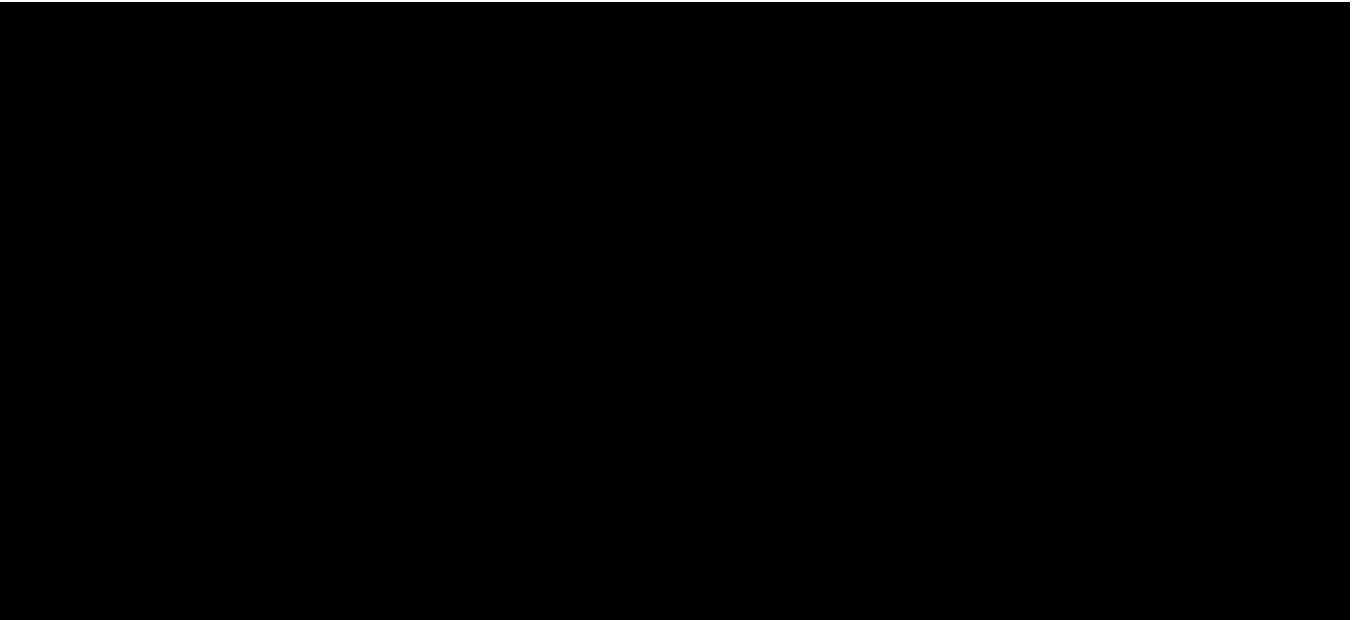
“

“The plug! The someone knows everything the person you go to the person that has connections, hooks you up with everything, knows what's going on - what's new, those guys are called the plug.”

- [REDACTED] 13, Chicago

Memes are the love of our generation.

- [REDACTED] friend party, 15, Chicago



BRINGING 3 EARLY TEEN GENERATIONS TO
LIFE

[REDACTED]

– 11 TO 12 YEAR OLDS

[REDACTED]

MEET [REDACTED] (11-12 YEARS OLD)



DAILY ACTIVITIES	School + home centric
DEFINING CHARACTERISTICS	Fun + Humor
SOCIAL AUDIENCE	1-2 BFFs in neighborhood
SOCIAL MEDIA BEHAVIOR	One way entertainment such as Netflix, You Tube Sharing/messaging with BFF Boredom Busters - playing games, filters, memes
ROLE MODEL	Older Sibling

[REDACTED]

[REDACTED] - 13 YEARS OLD

[REDACTED]

MEET [REDACTED] (13 YEARS OLD)

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	DAILY ACTIVITIES	Yogurt shop or mall after school
					DEFINING CHARACTERISTICS	Paradoxes + drama Freedom vs. responsibility, Insecurity vs. confidence
					SOCIAL AUDIENCE	Friend circle Soccer buddies or dance friends I feel comfortable around
					SOCIAL MEDIA BEHAVIOR	Group and video chat Spam "dear diary" sharing Escape into exploration and discovery
					ROLE MODEL	YouTuber or Celebrity

- 14 TO 15 YEAR OLDS

MEET [REDACTED] (14-15 YEARS OLD)

DAILY ACTIVITIES

Weekend day trips in nearby cities without parents

DEFINING CHARACTERISTICS

Self discovery + individuality

SOCIAL AUDIENCE

Finding my tribe
Many friend circles IRL and common interest friends to find what feels right

SOCIAL MEDIA BEHAVIOR

Exploration and discovery to escape

Exploration and discovery for self identity

Networking connections + new friends with common interests

ROLE MODEL

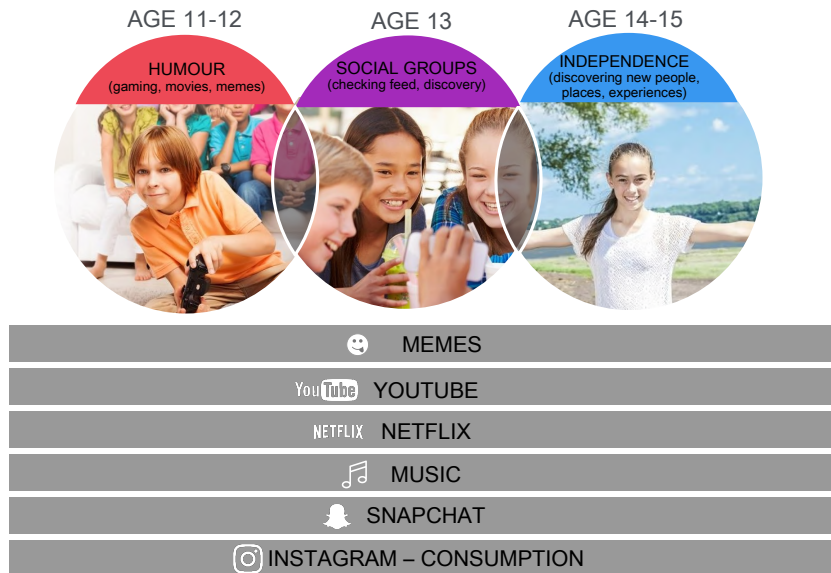
Expert in interest area

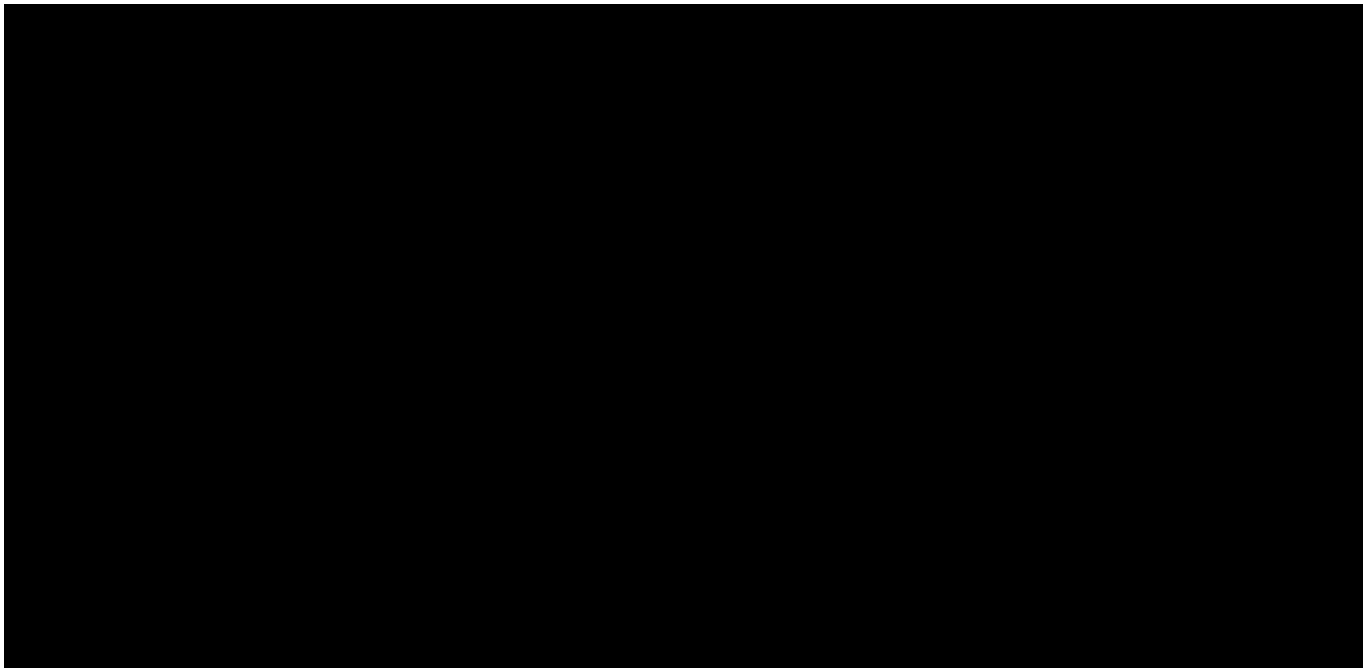
3 GENERATIONS OF EARLY TEEN – ONE PAGER

Name	Full of Fun-sense (11-12 year olds)	Licensed to Socialize (13 year olds)	Identity Quest (14-15 year olds)
Analogy	Cocoon	Turtle peeking head out	Butterfly spreading wings
Daily activities	School + home centric	Yogurt shop or mall after school	Weekend day trips in nearby cities without parents
Defining characteristics	Fun + Humor	Paradoxes + Drama Freedom vs. responsibility Insecurity vs. confidence	Self discovery + individuality
Social Audience	1-2 BFFs in neighborhood	Friends circle (Soccer buddies or dance friends) I feel comfortable around	Finding my tribe Many friend circles IRL and common interest friends to find what feels right
Social Media Behavior	One way entertainment such as Netflix, You Tube Sharing/messaging with BFF Boredom Busters - playing games, filters, memes	Group and video chat Spam “dear diary” sharing Escape into exploration and discovery	Exploration and discovery to escape Exploration and discovery for self identity Networking connections + new friends with common interests
Role model	Older Sibling	YouTuber or Celebrity	Expert/professional in interest area

REMINDER : OVERLAP EXISTS

There are many things that all age groups enjoy, the difference is time dedicated to each





SOCIAL MEDIA LIFESTYLE

SOCIAL MEDIA JOURNEY

■ High ■ Medium □ Low

				11-12 YEAR OLDS HUMOR	13 YEAR OLDS DRAMA	14-15 YEAR OLDS IDENTITY
ALONE, 1:1	 WATCHING/ GAMING	 NETFLIX  YouTube	MOVIES FUNNY VIDEOS GAMING WITH FRIENDS	<div></div>	<div></div>	<div></div>
	 CHECKING FEED		CHECKING FEED TRACKING CELEBS/YOUTUBERS	<div></div>	<div></div>	<div></div>
INNER CIRCLE	 MESSAGING	  FINSTA	TEXTING MEMES BFF CHAT FILTERS FINSTA	<div></div>	<div></div>	<div></div>
	 GROUPS / GROUP CHAT	  Houseparty	COORDINATING MEET-UPS GROUP SHARING GROUP CHAT GROUP VIDEO CALLS	<div></div>	<div></div>	<div></div>
BROAD- CASTING	 DISCOVERING PASSIONS / INTERESTS <small>EXPLORING / NETWORKING</small>		EXPLORER TAB HASHTAG FINDING NEW/INTERESTING PEOPLE	<div></div>	<div></div>	<div></div>
	 POSTING		POSTING STORIES LIVE FILTERS PICTURES MEMES	<div></div>	<div></div>	<div></div>

COUNTRY DIFFERENCES



US

YOUNGER FOR LONGER
NO DOWNTIME
MORE TRAVEL
STARBUCKS HANGS
THE TBH EFFECT
NEIGHBORHOOD NEST



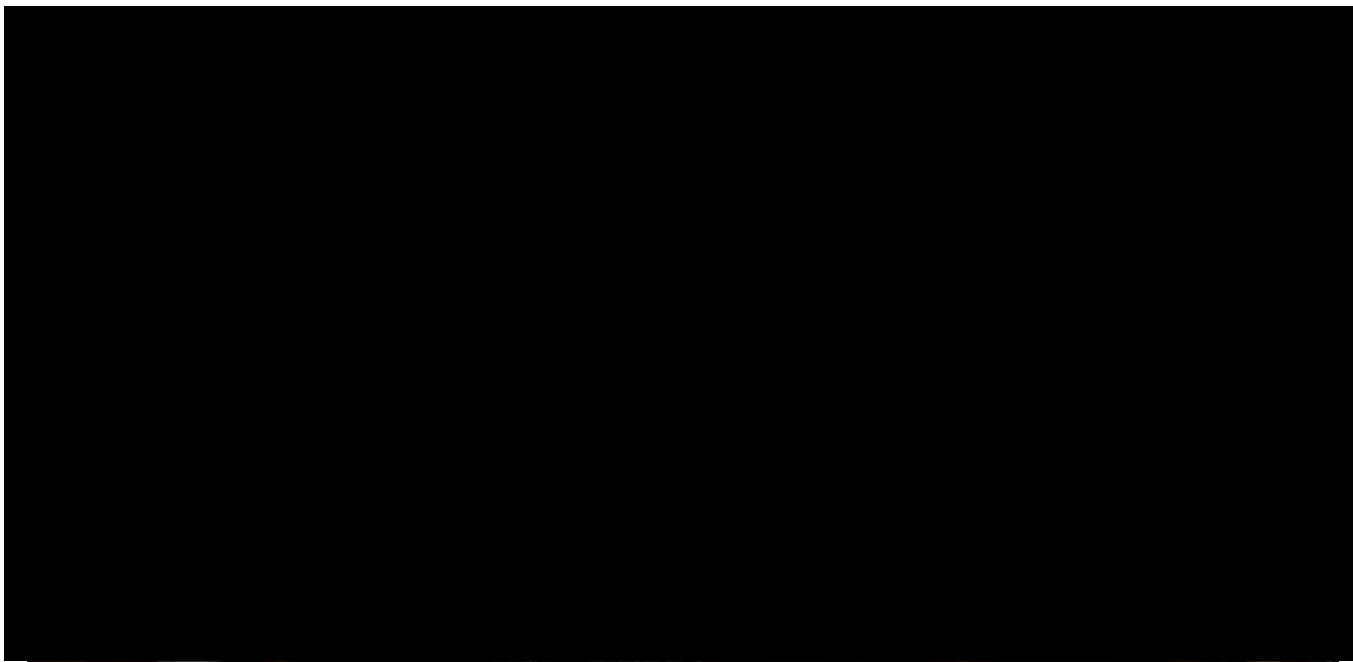
BRAZIL

EXTENDED FAMILY = NUCLEAR FAMILY
MORALISTIC
KINDNESS CULTURE
MORE DOWNTIME
HIGHER BEAUTY STANDARDS
SCHOOL RELAXED
TOLERANT / WORLDLY
STREET NEST



UK

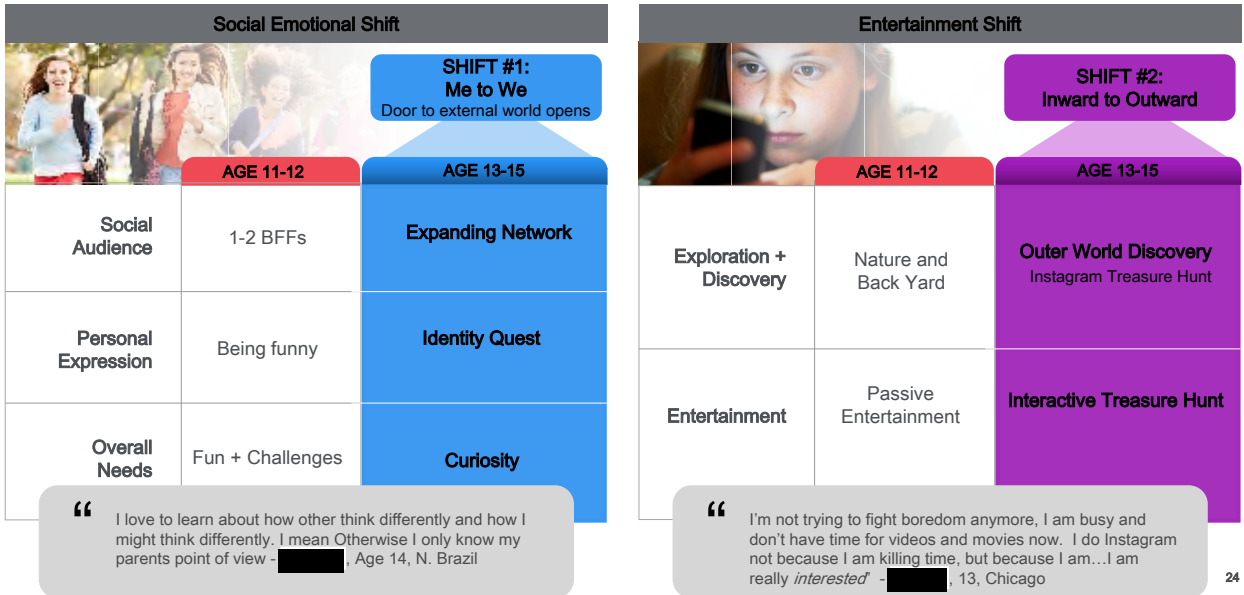
URBAN VIBE
MCDONALDS HANGS
PARTIES + VAPING
TOWN NEST



DEVELOPMENTAL SHIFTS AT AGE 13

AGE 13 SHIFT SUMMARY

TWO SHIFTS AT AGE 13:



24

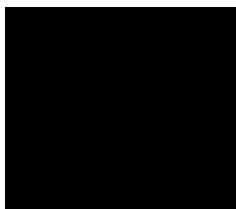
- In the US, the shift occurs 2 years after entry to 6th grade and middle school (middle school + first phone at 11, shift at 13)
- In the UK, the shift also occurs 2 years after they enter secondary school at age at 13. Interestingly, teens in the UK take the GCSE exam at age 13 (a marker of maturity and independence from parents) which also coincides with these shifts
- In Brazil, the shift occurs much earlier (2 years earlier+). Elementary school in Brazil includes ages 7-14

EARLY TEENS AND INSTAGRAM

JOINING INSTAGRAM

INSTAGRAM SELLS ITSELF:

In 6th grade, age 11-12, teens get first phone and are “invited” in one of two ways...



BFF

“My friend just got it and told me to download it.”

— [REDACTED], 12, LA



TOP ACCOUNTS

“I want to see what my favorite YouTubers and soccer players are doing in real-life (off the screen... off the field)!”

— [REDACTED] friend group, 14, S. Brazil

INSTAGRAM DRIVERS



	LIFELINE	DISCOVERY AS ENTERTAINMENT
EMOTIONAL BENEFITS	IN CONTROL OF LIFE <ul style="list-style-type: none"> • I'm not alone • FOMO – not missing out • On trend 	<ul style="list-style-type: none"> • Developmental need – scan word to find self • Curiosity peaked at age 13 • Rewarding treasure hunt. Each layer leads to another • Escape after homework and before bed • I am more interesting "I have more to talk to friends about"
DRIVING BEHAVIORS	<p>My lifeline – Constant feed checking</p> <p>“ Couldn't survive – need to see what everyone's up to - feel I am not missing out. I see what other 7th graders are doing that I should try.</p> <p>- [REDACTED], 12, Chicago</p> 	<p>Endless Treasure Hunt</p> <p>“ I go to bed at 9:30. I look at my clock and it's 1am!</p> <p>- [REDACTED] 13, Chicago</p> 



INSTAGRAM DRAWBACKS



PRODUCTION



CONSUMPTION

UNDERLYING EMOTIONS

EMOTIONAL BARRIER: CONFIDENCE "PERFECT STORM"

- Who am I?
- Hormones, drama, judgement
- Need to impress boy/girl crush
- Need to be cool and fit in

UNDERLYING TEEN NEEDS:

RELEVANT
(show me stuff I love)

EASY
(serve it up to me, fewer clicks)

INTERACTIVE
(make it fun)

DRAWBACKS

Looking, not producing

“ I am a professional stalker.”
- [REDACTED], 13, Chicago

"Less is more" unwritten rule

“ Not cool to post any more than once a week and need to keep caption short and sweet.”
- [REDACTED] party, 14, LA

Teen relevant content needed in explorer tab

“ Stuff for parents or kids not teens, and there's porn that's really weird.”
- [REDACTED], 13, Chicago

YouTube Product Parity

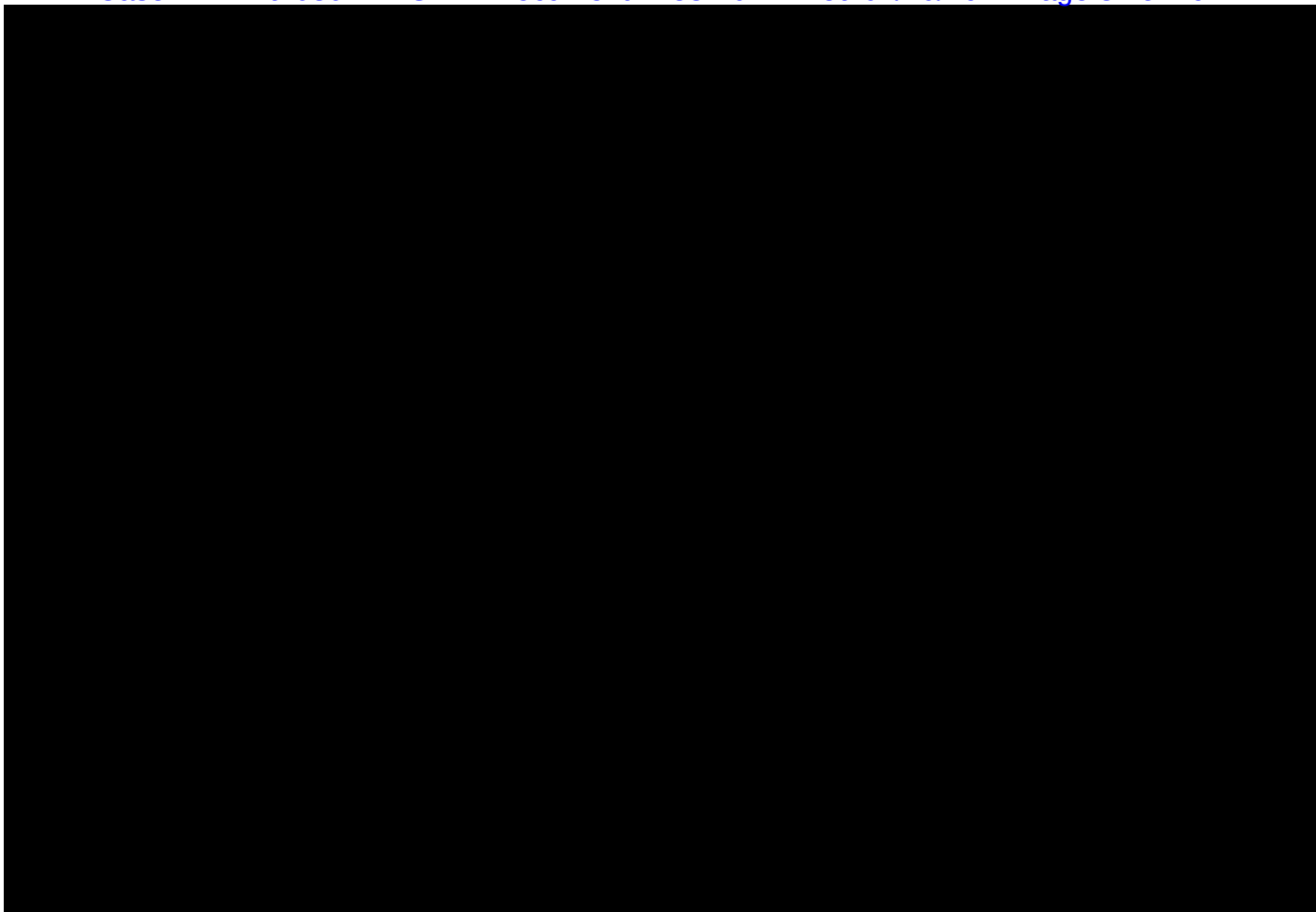
“ FB and YT play videos I like streamlined, I don't press a button,”
[REDACTED], 14, UK

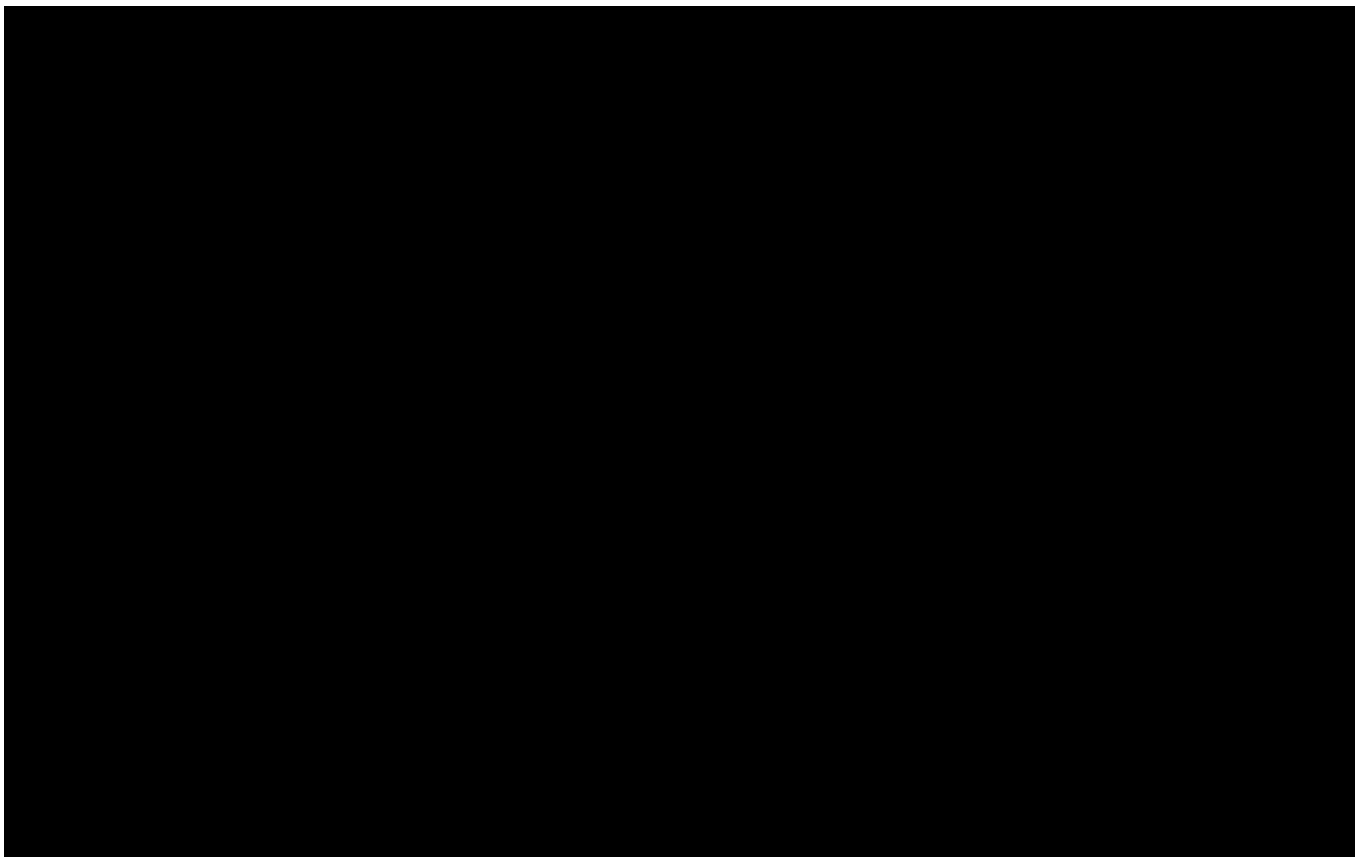
Explorer content + tab awareness

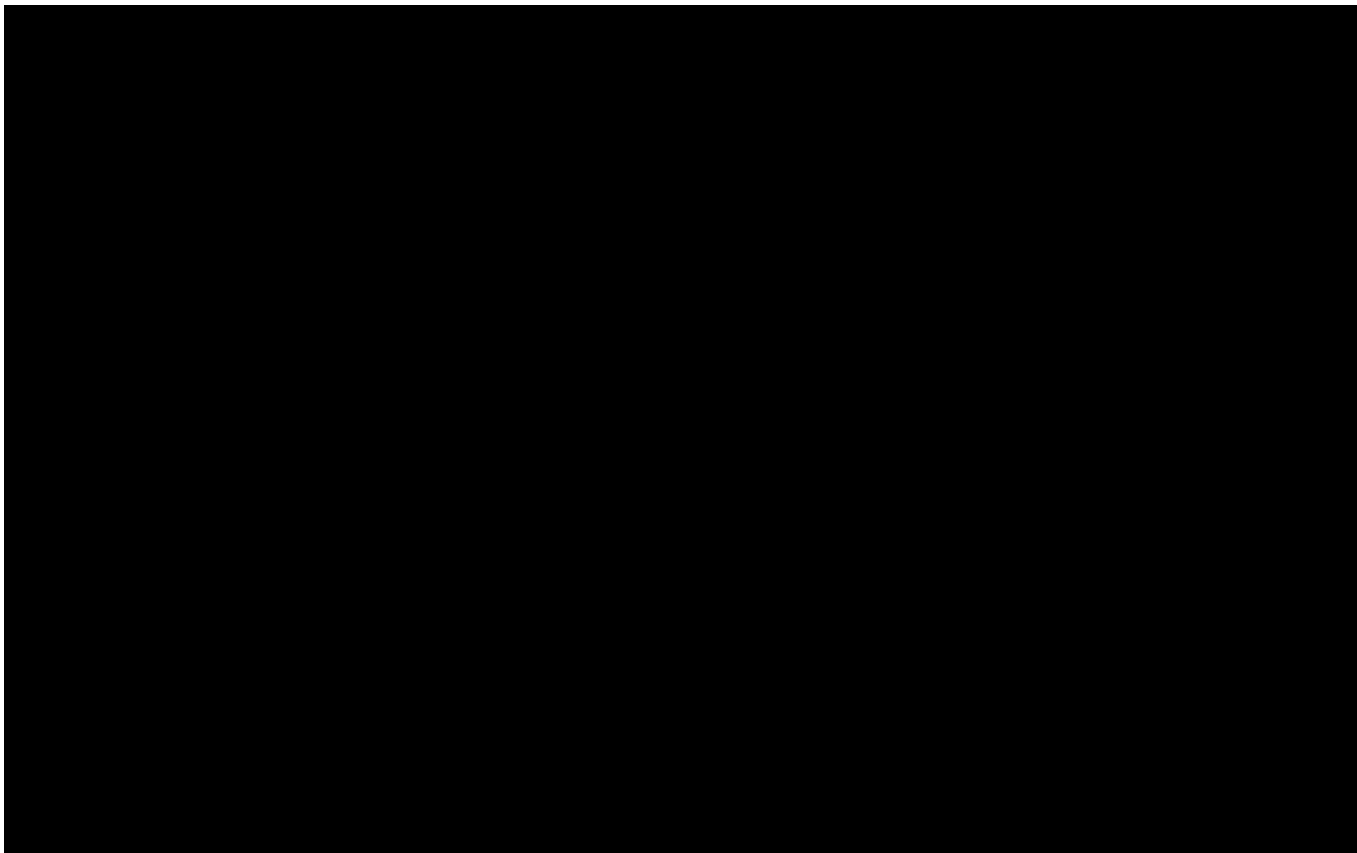
“ I didn't even know Instagram had all this stuff! I only use explorer tab to find people.”
[REDACTED], 14, S. Brazil

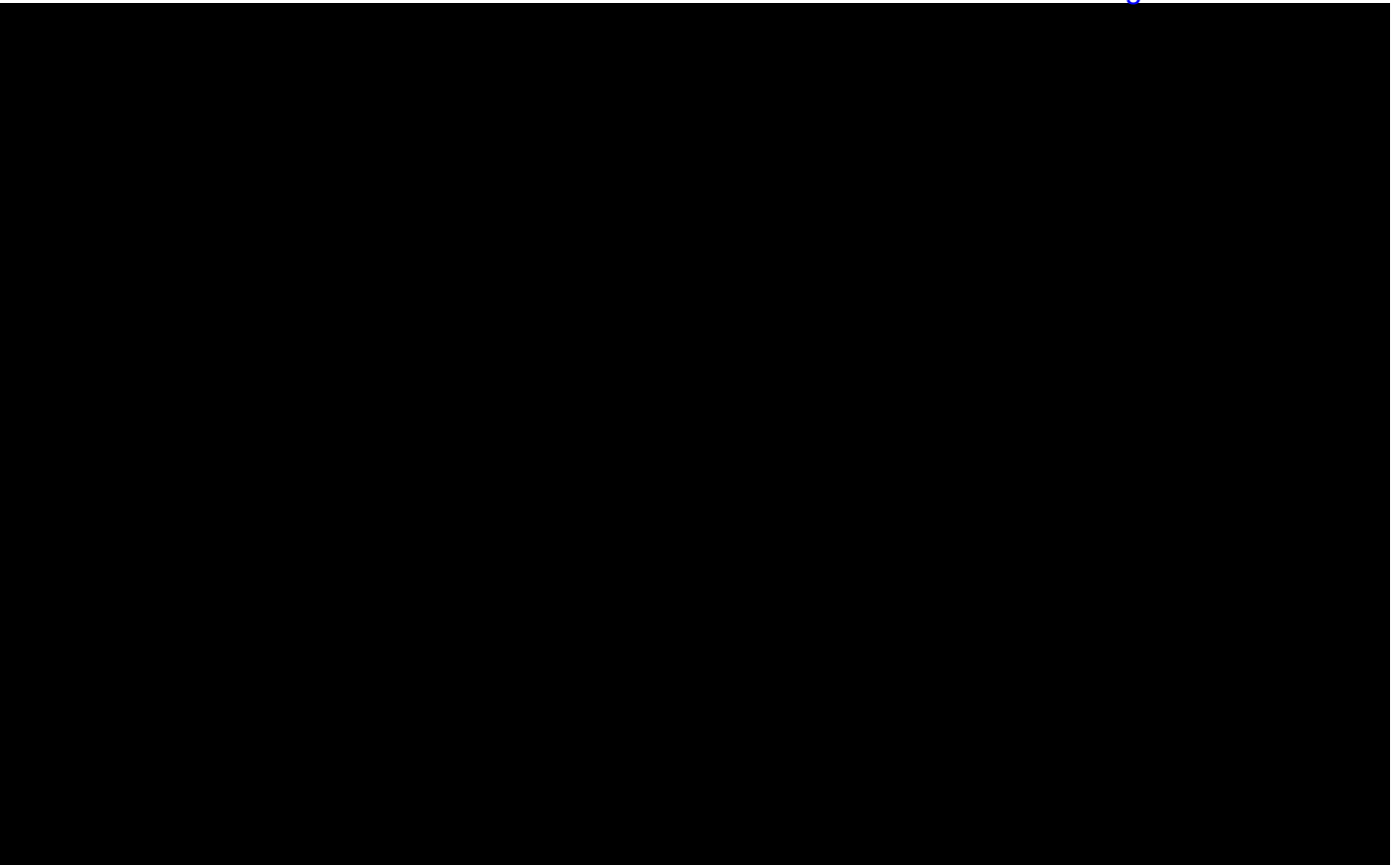
Feed check-in is necessity

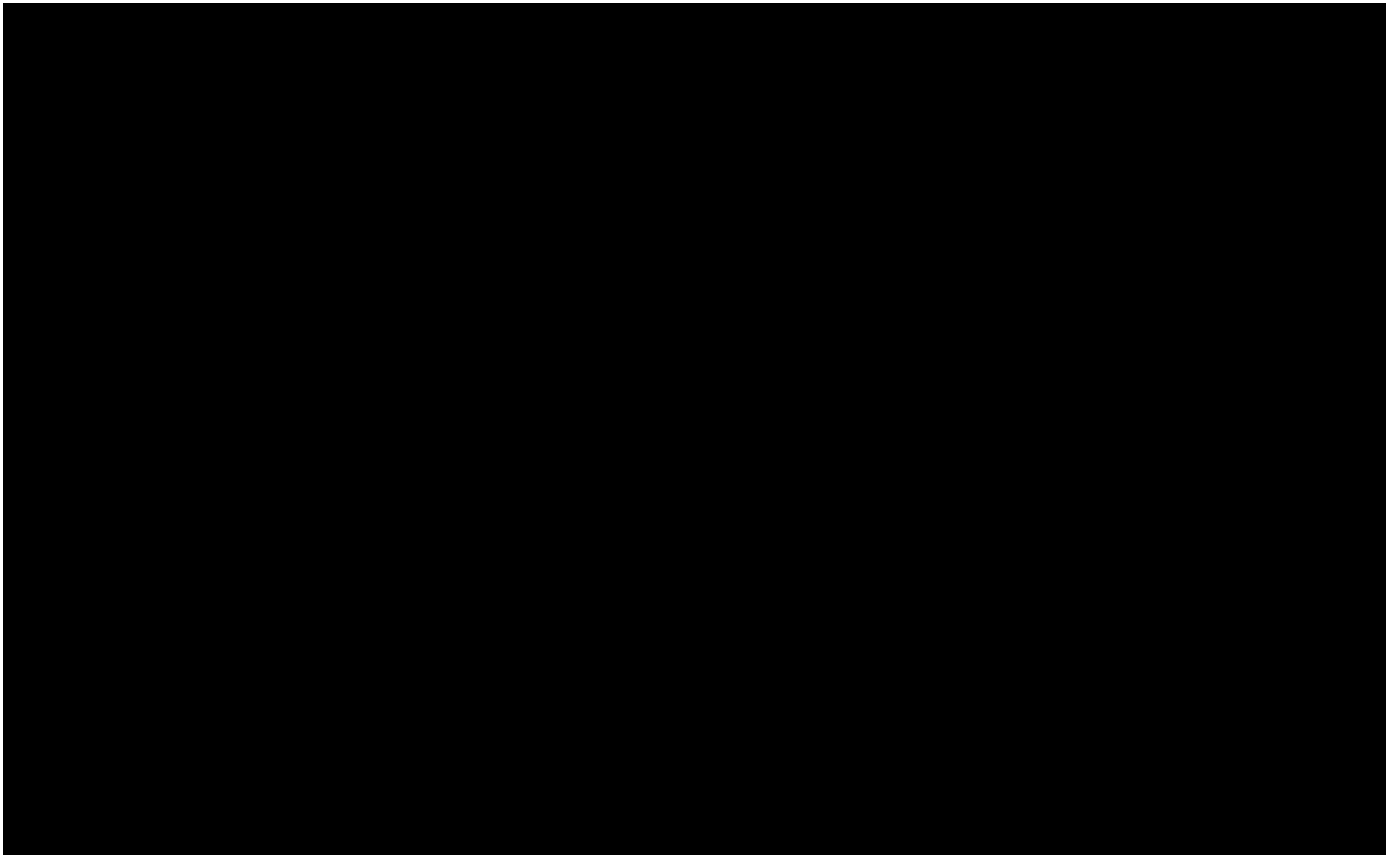
“ I check my feed all day long, but it only takes 8 minutes, and I wish it were more interactive and fun.”
- [REDACTED] party, 15, UK

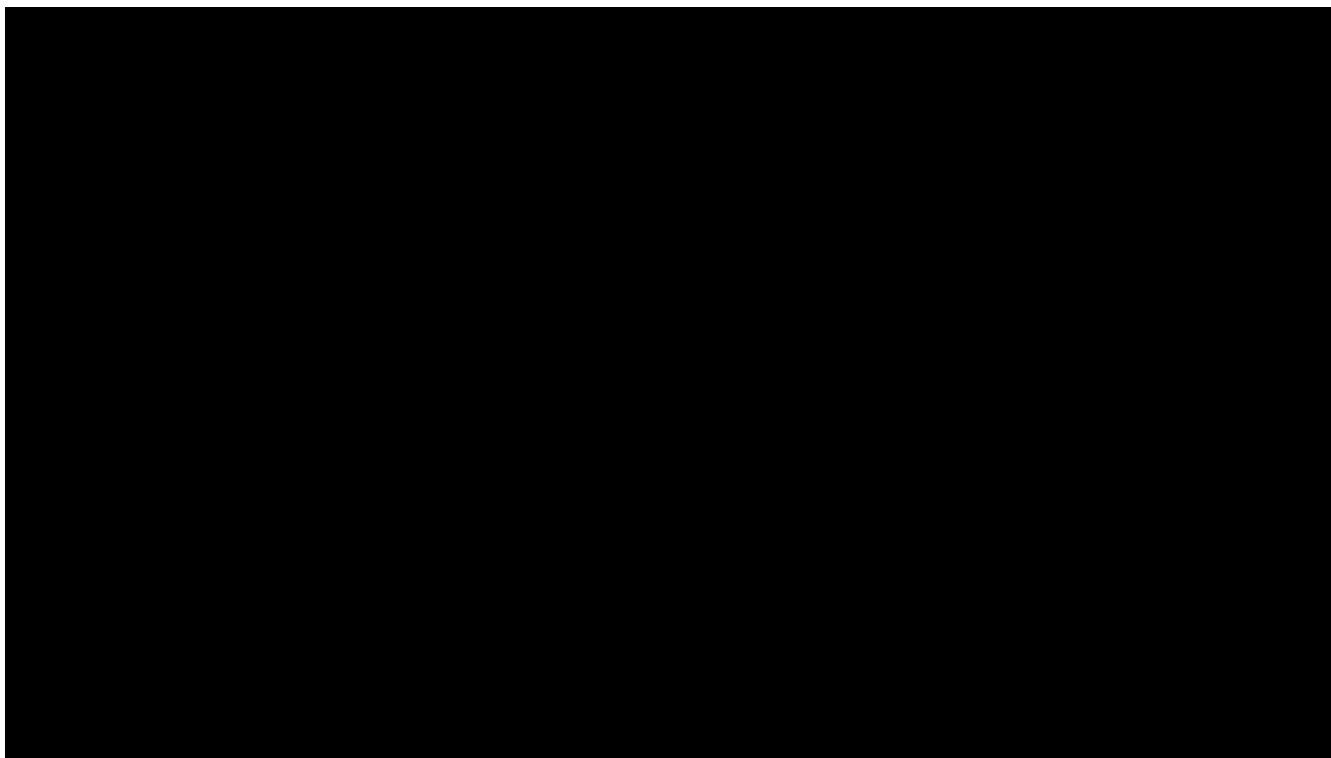


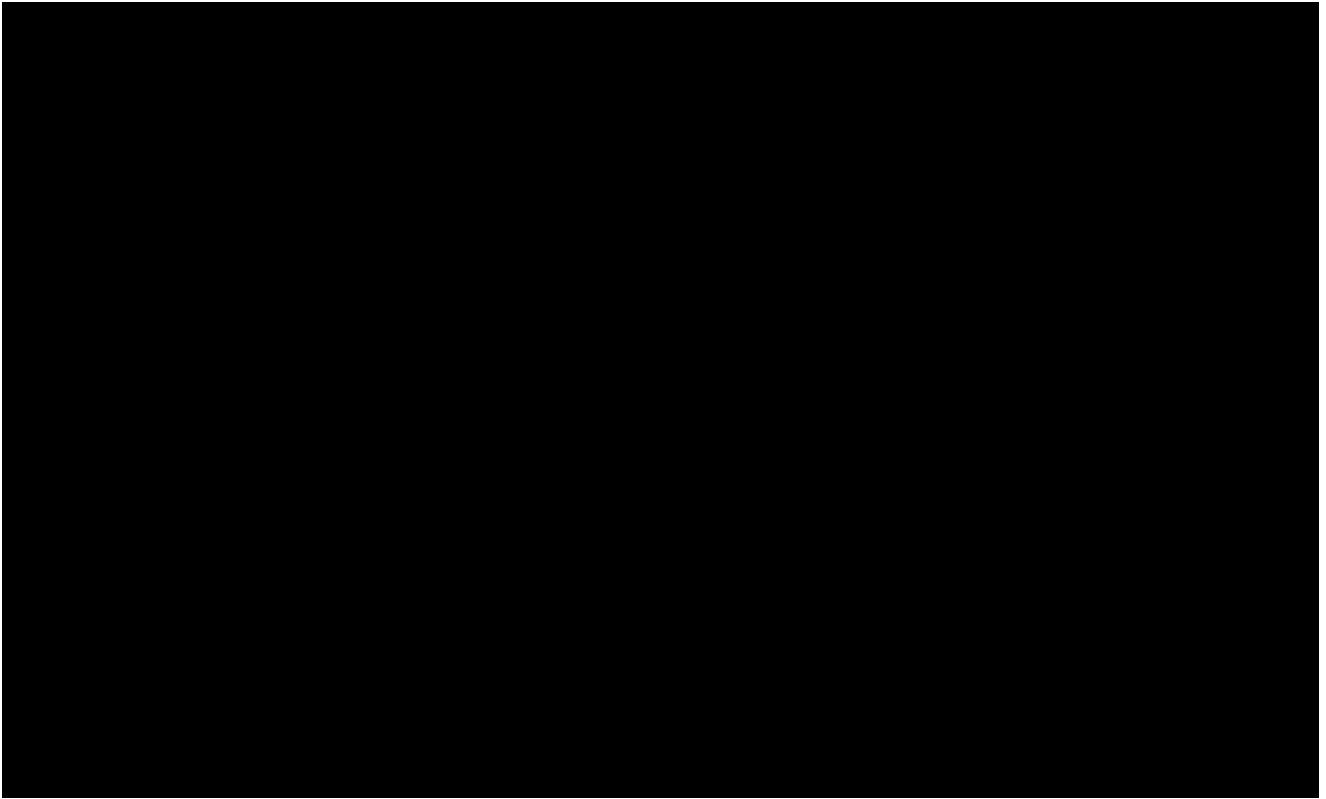


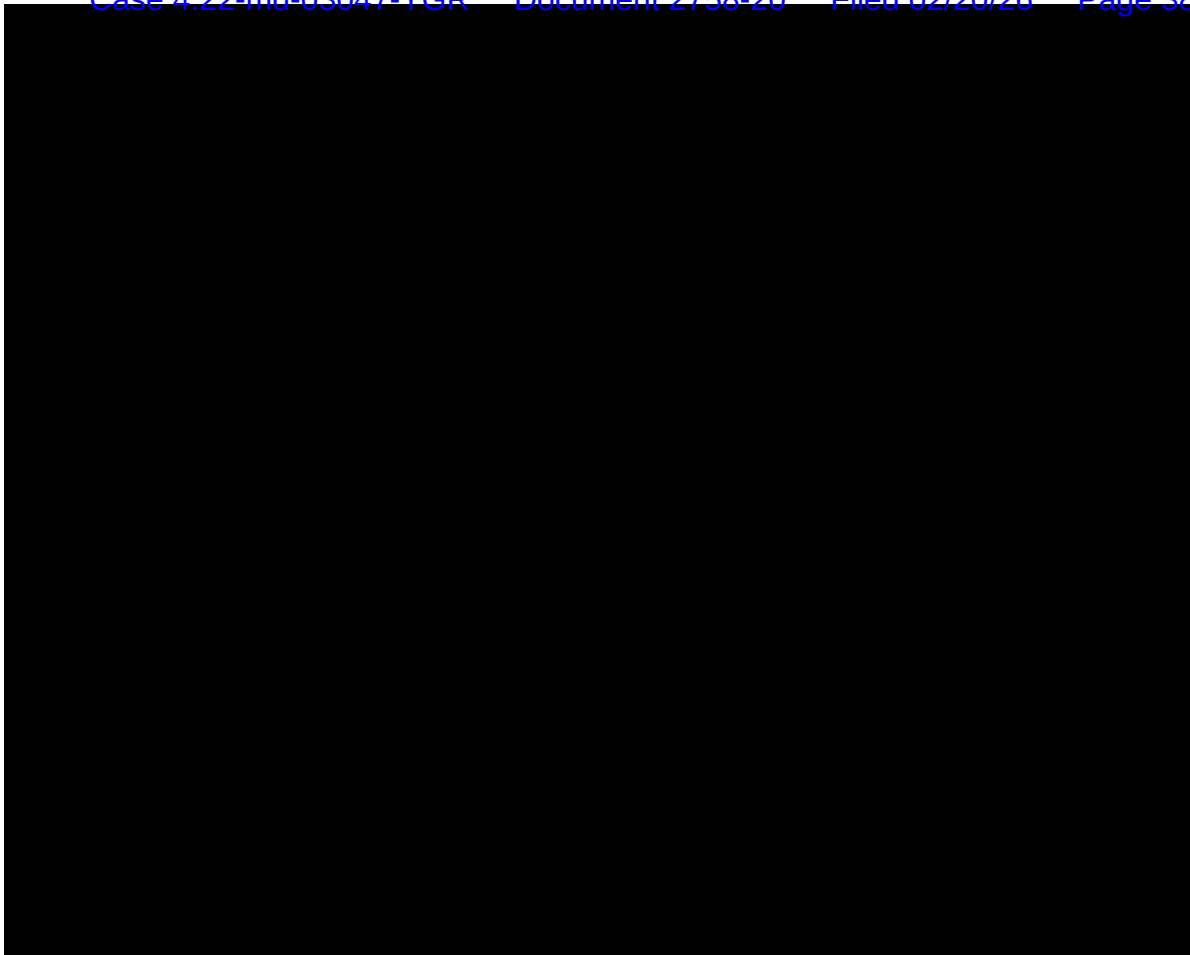












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