

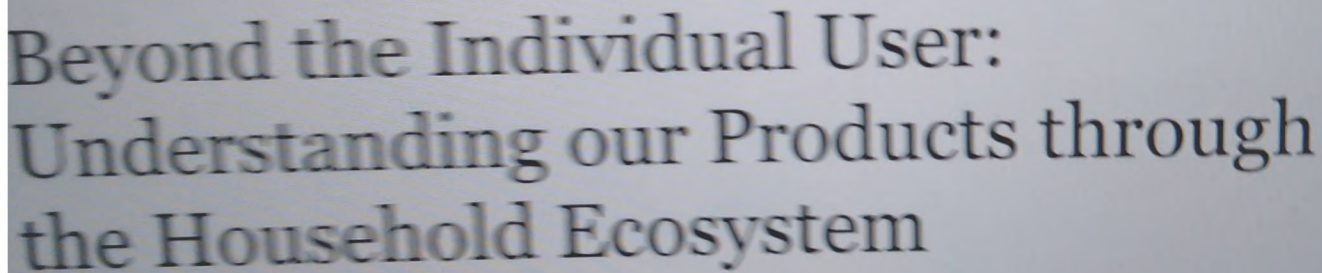
AMENDED Exhibit 327

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



Overview

Our company often looks at how individuals engage with our products - and yet our products are social and usage affects relationships. This research gives our company a m Chats

MacBook Pro

Our company often looks at how individuals engage with our products - and yet our products are social and usage affects relationships. **This research gives our company a more holistic view of how our products are impacting the Household Ecosystem across teens, their siblings and parents/guardians.**

How this research initiative came to be...

This Household Ecosystem project is a part of Instagram's innovation investment for our company's understanding of Youth. It incorporates a lens around ongoing conversations of IG's role in the Family of Apps. This includes how usage of Family Apps might change over time, and was inspired by projects internally (e.g. IG Market Research on Teens, Messenger Kids) and externally (e.g. academia, the popular press).

By understanding a Household Ecosystem (pre-teen, teen, and parent/guardian within one household), **we uncover more of the social dynamics across close relationships that influence how people think and use IG over time. Additionally, we gain signals and emergent insights for our Family of Apps.**

Goals

We explored the division of and the overlap between in real life (IRL) relationships and app use to do the following:

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Goals

We explored the division of and the overlap between in real life (IRL) relationships and app use to do the following:

- Help **define Instagram's role in the Family of Apps** and how that role might vary generationally within the U.S.
- Identify **opportunities to increase wellbeing, strengthen reachability, and foster growth** through better a understanding of how family relationships and family-based gatekeepers affect a user's relationship with Instagram.
- Understand the role family members can play in a user's **likelihood to join** and to **continue to use** Instagram; ability to develop a healthy graph; ability to **control problematic usage**; likelihood to engage in **social comparison**; **use of other social platforms** (FB, TikTok, Snapchat, Twitter, LinkedIn).
- **Identify new product opportunities** for Product Foundation (e.g. Notification Settings and Controls, Quick Promotions, Interfaces (e.g. tablets, desktops), Growth (e.g. Multiple Accounts, NUX), and Well-being (e.g. social comparison, problematic use).
- **Begin to forecast future social media trends** and unmet needs for teens and their families.

Methodology

Prior to working at FB Inc., I spent 5+ years studying dyadic relationships (both romantic and platonic). Similar to the research that I did at Facebook, I was interested in

Chats

Methodology

Prior to working at FB Inc., I spent 5+ years studying dyadic relationships (both romantic and parent-adolescent). Similar to discrepancies that can often occur between objective and subjective reports, **I was often struck by how a teenager's evaluation of a particular stressor (e.g. the college application process) was not consistent with the parent's report of that very same stressor.** When developing this research plan, I couldn't get my own mother's voice out of my head: "You're always on your phone." "Am I," I questioned? In my opinion she's always on her phone!

In order to build a comprehensive understanding around questions such as how the introduction of a new social app (i.e. Instagram) might impact familial relationships, or how social media engagement is influenced by the Household Ecosystem, **we needed insight from all family members.** We opted to also include preteens, not yet on Instagram, to shed light on the household's role in developing perceptions of Instagram prior to usage.

Across the U.S, in both rural and urban cities, we got to know 13 families. Each family consisted of at least one pre-teen, an active teen Instagram user, and a parent/guardian. We prioritized finding a sample that was demographically and geographically diverse. We found a mix of both single and two-parent households, and a sample of parents who varied in their understanding of, acceptance for, and use of social media and Instagram specifically.

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Note: Participants provided consent to use images/videos for internal purposes

Before visiting families in their homes we first held virtual one-on-one “Meet & Greet” interviews with each family member. The Meet & Greets allowed us to establish a rapport prior to the in-home visits, gather a baseline understanding from each family member as to how they think about and use social media, and to confirm that an in-home visit would be fruitful, given this early signal. This then allowed us prioritize familial and dyadic

conversations (e.g teen & preteen; mother & preteen) when in-home.

This work would be strengthened by a longitudinal perspective. A long-term diary component would shed light on: how behaviors are learned and how they evolve/remain constant overtime

conversations (e.g. teen & preteen; mother & preteen) when in-home.

This work would be strengthened by a longitudinal perspective. A long-term diary component would shed light on: how behaviors are learned and how they

evolve/remains constant overtime, how needs/expectations from the household change over time, and how life-stage changes (e.g. going

to college) or the introduction of a new social media products impact Instagram usage or the role a household might play.

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Signals of potential product impact across teams...

With our last round of research underway, we wanted to provide a taste of the types of insights we're gathering:

1. The first child plays a pivotal role in bringing the rest of the family to IG, influencing both the parent(s) and younger sibling(s) to join. Most parents joined Instagram in order to learn and participate in this part of their eldest teen's world. While Instagram has **unique potential**, as it was **typically the only social platform that all family members used**, we should be thinking about how having parents being on **Instagram might affect graph management and teen engagement over time.**

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1. The first child plays a pivotal role in bringing the rest of the family to IG, influencing both the parent(s) and younger sibling(s) to join. Most parents joined Instagram in order to learn and participate in this part of their eldest teen's world. While Instagram has unique potential, as it was typically the only social platform that all family members used, we should be thinking about how having parents being on Instagram might affect graph management and teen engagement over time. Discovery/usage of additional accounts could prove critical for authentic sharing by teens.

2. Parents served several functions within a teen's Instagram experience: **Gatekeeper** owning their teen's account credentials; **Interpreter/Mediator** providing perspective on drama; **Cheerleader/Advisor** celebrating successful posts or advising on posts-in-progress; and **Identity Guardian** helping teens navigate questions of authenticity and stay true to "who they are." How might Instagram provide support in these ways when a parent is unable to?

Members of rural single-parent households struggled the most with well-being challenges on Instagram and had the fewest resources for dealing with them.

3. Many kids thought their parents were "addicted" to their phones. Almost all youth participants referenced times when a parent did not hear/listen/attend to them because they were occupied with a task on the phone. While parents acknowledged mild problematic use they did not want to change their behavior; believing they needed continuous connection with others. Parents seemed unaware t

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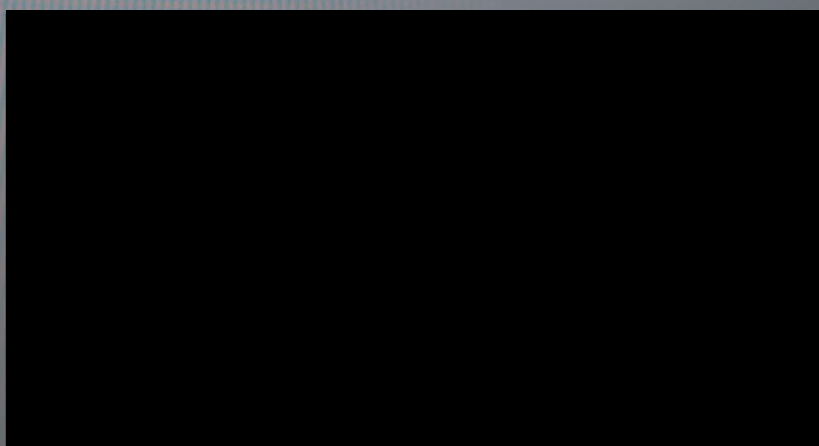
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3. Many kids thought their parents were “addicted” to their phones.

Almost all youth participants referenced times when a parent did not hear/listen/attend to them because they were occupied with a task on the phone. While parents acknowledged mild problematic use they did not want to change their behavior; believing they needed continuous connection with others. Parents seemed unaware that their smartphone usage might be driving their kids’ usage. **In comparison, teens did want occasional breaks from connectivity**, such as while doing homework, studying for exams, at a concert, or while playing sports. **Many teens had explored Instagram’s notification settings and adjusted them for different circumstances. They did not find this easy to do, however.**

4. While the new user experience felt ‘easy and straightforward’ for these youth participants, there’s **deeper guidance and coaching missing from onboarding that’s currently being fulfilled by older siblings**. Joining Instagram feels important and mysterious, and setting up a first account feels like an exciting, high-stakes act. Teens want to make a good first impression and don’t want to make a mistake.

Those with older siblings felt more confident with their sibling there to answer questions like: Why start out private? How do people choose their usernames and profile pictures? Who should they (not) Follow? What types of comments are appropriate to write, how to think about counts and ratios? **How might we make it feel that everyone has an older sibling there to**



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5. TikTok is unique in that it gives teens the sense that **they/their content could go viral**. The app's ability to **initiate collaborative, offline behavior** (i.e. co-creation videos among friends) during a day-in-age when social interaction feels more common online than in-person, makes it particularly powerful. Hearing TikTok described as a kind of "catharsis" **helping teens 'laugh and get out of a dark mood,'** suggests well-being benefits of the app as well. Finally, parents expressed less concerns towards TikTok than they did towards Instagram and Snapchat. The app felt more 'fun' and 'healthy.' TikTok offers the ability to **"turn off" the messaging**, which we know, as Gatekeepers, is one of parents' biggest concerns around their children using social media.

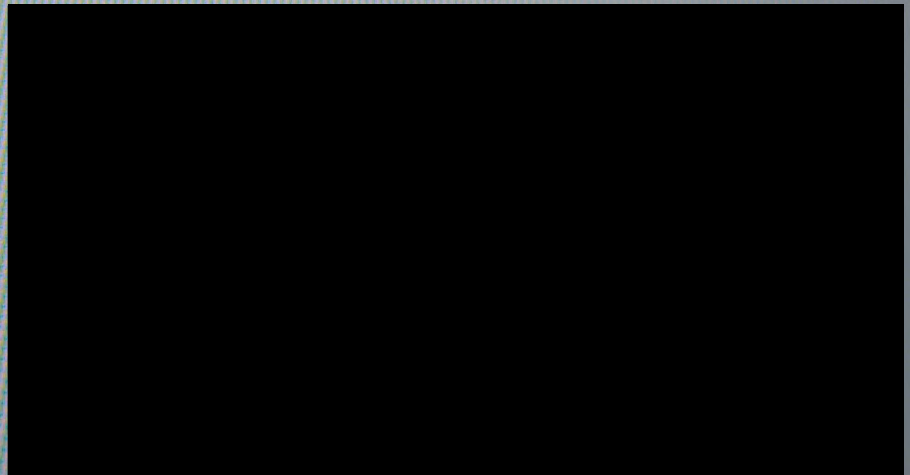
Looking ahead...

Our last wave of research with families in Birmingham, AL, the Midwest, and the Tris Chats

Looking ahead...

Our last wave of research with families in Birmingham, AL, the Midwest, and the Tristate area is currently underway! **You can expect share-outs tailored for specific product teams as well as more holistic syntheses highlighting themes or opportunities across the Family of Apps.**

Longer term, we're eager to explore the intersection between digital and familial relationships outside the U.S.



But this is just the beginning!

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This research, which focused on deepening our understanding of how social media and IG fit into Household Ecosystems, will ladder up to the larger investment Instagram Community is making in 2020 to understand Youth over time and Instagram's role in the Family of Apps, led by Crystine Gray.

Communication technology and teens' usage of it is constantly evolving. It's critical we keep a pulse on Instagram's place in this rapidly changing social media environment and on Instagram's specific role within the Family of Apps.

If you have or are considering work with Youth (especially teens) and/or on Household Ecosystems and/or Family of Apps usage overtime, please reach out! Let's leverage what's been learned across the Family of Apps to help inform the future of our products.

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This project would not be possible without the support of the Instagram Community Family. Special thanks to [REDACTED] for his support, encouragement, and brilliant insights along the way. [REDACTED] and [REDACTED] for feedback on this note and future share-outs, helping ensure this work will impact what's to come. Kristin Hendrix, [REDACTED] Shruti Bhutada, [REDACTED] [REDACTED] [REDACTED] [REDACTED] & [REDACTED] for methodology recommendations, discussion guide feedback, and help with insight prioritization. [REDACTED] for designing concepts to fuel in-home discussions. And most importantly, [REDACTED] and AnswerLab for help facilitating this ambitious program of research.

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