

## **AMENDED Exhibit 275**

# **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 Feed Sharing & Profile's Top 5 People Problems - H1 2017

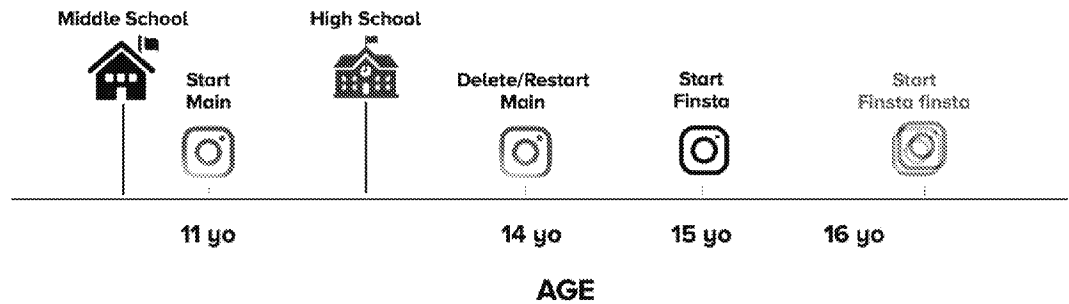
TL;DR:

- For people, especially teens, their Instagram profile represents their image online, and they are concerned about how they appear on their profile grid. One workaround is creating Finstas, the ultimate Identity & Audience Control.
  - WHAT WE'RE DOING: Favorites, Finsta Growth
- Since people want their profile to portray a curated self-image and also be aesthetically pleasing for others, they share less or use workarounds, like deletion, to control how their profile looks.
  - WHAT WE'RE DOING: Archive
- Timely self-representation is important, especially to teens, as the high rate of deletion reveals, and both IG and Snapchat Stories have cannibalized Feed Sharing as a lightweight way of daily sharing.
  - WHAT WE'RE DOING: Saved/Archive Stories, Cover Stories/Story Highlights, Carousel
- From a consumer's post of view, a private IG profile gives little information about a person, and people who have private accounts also want to share more information, especially about their interests, which they often "hack" in their bio.
  - WHAT WE'RE DOING: Expressive Bio, Actionable Profile
- Lastly, with all these features and additional ones from the Instagram ecosystem, it's important to keep Instagram's profile framework simple and easily understandable.
  - FUTURE OPPORTUNITY: Profile Framework Redesign

I joined the Feed Sharing and Profile team in October of 2016 and have conducted 10+ studies with 90+ people (and 5k+ survey respondents), including teens. Here is a summary of the top People Problems for Instagram Feed Sharing and Profile in H1 2017 and what the team is doing to address them:

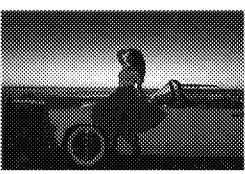
- For people, especially teens, their Instagram profile represents their image online, and they are concerned about how they appear on their profile grid. Profile is a very important surface on Instagram, especially for teens. It is 23% of their IG Time Spent with 91% daily participate rate for teens. 24% of DAP spend more time on Profile than Feed (read [Kevin Huang's data analysis on the IG Profile and Teens](#) for more)
  - Timeline of Instagram Usage: Teens typically join Instagram when they are in middle school at age 11-12, but it's not until they are in high school when they're obligated to accept invites from all peers that their follow count increases exponentially. Teens feel a great deal of social scrutiny on their first Instagram account and often delete most of their "cringy" middle school photos.

## TIMELINE OF INSTAGRAM USAGE



- o Finsta, the ultimate Identity & Audience Control: Another interesting social phenomenon is the idea of "Finstas" (for "Fake Insta" also referred to sometimes as a "Private" or "Spam"), a second Instagram account that teens create for an exclusive group of best friends used as both identity and audience control to allow for intimate, authentic expression with long, diary-like captions (watch this video of a teen talking about her Finsta). 18% of US teens are weekly active Finsta users, 9% of Global teens are weekly active Finsta users, and Finsta users share 3x as much content as non-Finsta users. Check out the Understanding Finstas deck [here](#) and this note on [Why and How Teens use Finstas](#).

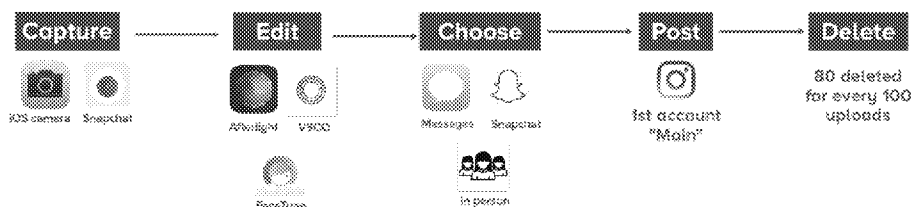
| MAIN                                                                                                                                                                                                                                                                                                                                                                                                                            | FINSTA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <ul style="list-style-type: none"> <li>• <b>Start:</b> First account between age 11-12</li> <li>• <b>Called "Main"</b></li> <li>• <b># of Followers:</b> 500</li> <li>• <b>Videos:</b> Less videos</li> <li>• <b>Tone:</b> Serious or Official</li> </ul>  |  <ul style="list-style-type: none"> <li>• <b>Start:</b> Second account, between 14-15</li> <li>• <b>Called "Finsta", "Private", or "Spam"</b></li> <li>• <b># of Followers:</b> 50</li> <li>• <b>Videos:</b> More videos than Main</li> <li>• <b>Tone:</b> Raw emotional connection - sad, angry, happy</li> </ul>  |

| <b>MAIN</b><br>                                                                                                                                                                                                                                                                                                                                           | <b>FINSTA</b><br>                                                                                                                                                                                                                                                                                                                                                                            |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• <b>Content:</b> Landscapes, group pics, selfies</li> <li>• <b>Invite:</b> Most people a teen knows, especially from school</li> <li>• <b>Goal:</b> Maintaining an image and reputation</li> <li>• <b>Seek:</b> Likes and comments from audience</li> <li>• <b>Captions:</b> Thoughtful with hashtags</li> </ul>  | <ul style="list-style-type: none"> <li>• <b>Content:</b> Close-up selfies, quotes, screenshots</li> <li>• <b>Invite:</b> Closest friends/friends' finstas</li> <li>• <b>Goal:</b> Express authentic emotions akin to a diary or photo blog</li> <li>• <b>Seek:</b> Affirmation and advice</li> <li>• <b>Captions:</b> Lengthy with conversational comments (56% longer than Main)</li> </ul>  |

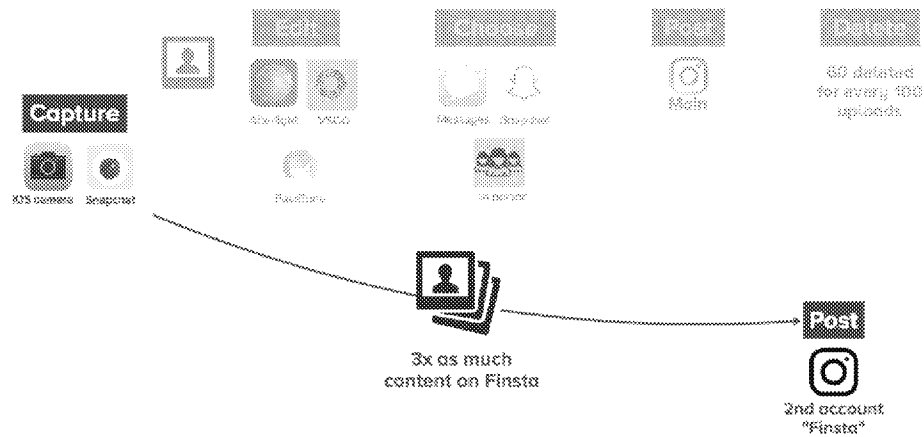
#### ◦ WHAT WE'RE DOING:

- Favorites is a small subset or list of close friends that people can choose from their current list of IG followers and share content with just this limited group of people.
  - Finsta Growth is an effort on the Growth team to encourage teens to create their first Finsta account and to teach them to use the multi-account switcher.
  - Future Opportunities: The team hasn't explored teaching about Multiple Account Switching (MAS) in more depth, an opportunity to consider in the future.
- Since people want their profile to portray a curated self-image and also be aesthetically pleasing for others, they share less or use workarounds to control how their profile looks.
  - Content Curation and Image Control: Due to their high follower count and perceived quality bar, people, especially teens, feel that they can't express the depth and breadth of their identity for fear of not connecting with everyone in their graph. - "Your profile needs to have the best content ... users will go to the next profile if you're not engaging." Read more [here](#).
  - Aesthetic, visual themes - Many also strive to have a carefully curated, visually appealing and consistent "theme." This can be accomplished by using the same filters, adding unique effects using third-party apps, experimenting with white borders, and so on. 75% of surveyed teens said they did not post a photo they had taken to IG because: "It didn't go with the theme of their profile." (See Meagan McDonald's note on "Teen Sharing on Instagram.")
  - Lifecycle of an Instagram Post: Another interesting contrast between Main and Finsta accounts is how the lifecycles of posting differ. A teen's Main account has several steps in which they have to edit their media in third-party apps and then ask their friends for advice about which picture to share whereas they will post in unfiltered bursts to their Finsta accounts. Deletion also occurs less in Finsta accounts. More information is in the Understanding Finstas deck [here](#).

## LIFECYCLE OF AN INSTAGRAM FEED POST

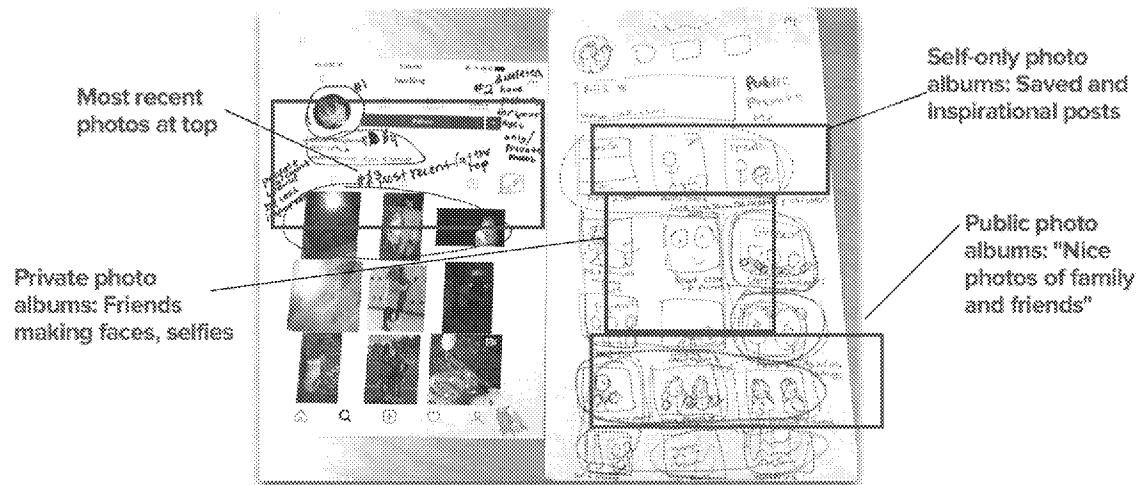


## ON FINSTAS, TEENS POST 3X AS MUCH CONTENT WITHOUT CURATION

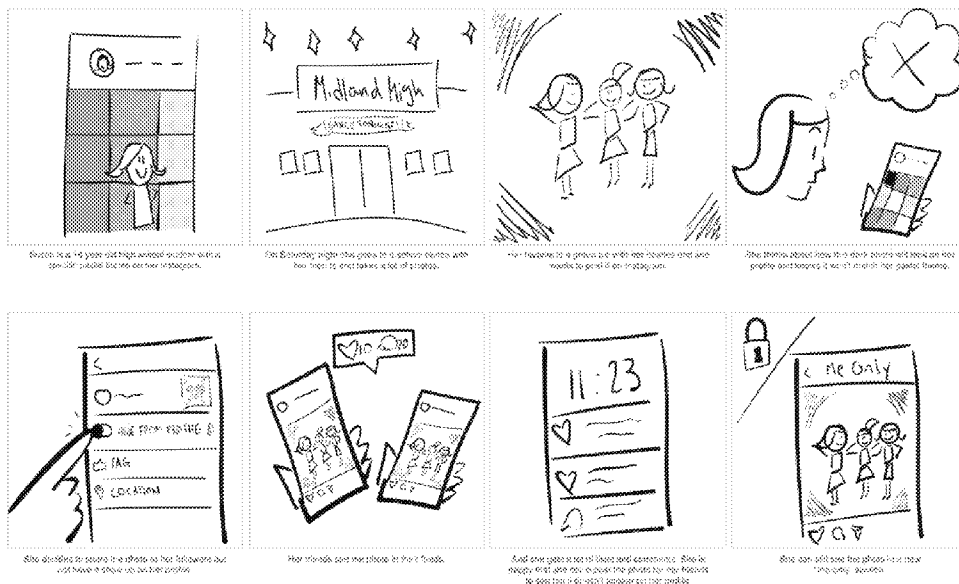


- One of the main workarounds to profile curation is deletion as referenced above. We know that teens delete 80 photos for every 100 they post. In a Participatory Design study, teens talked about wanting a private surface where they could see past deleted photos for themselves, so we put some Comic Storyboard Concepts in front of people and observed their reactions.

"The public eye could only see these 5 pictures. I could look back at something that makes me happy and feel good about myself."

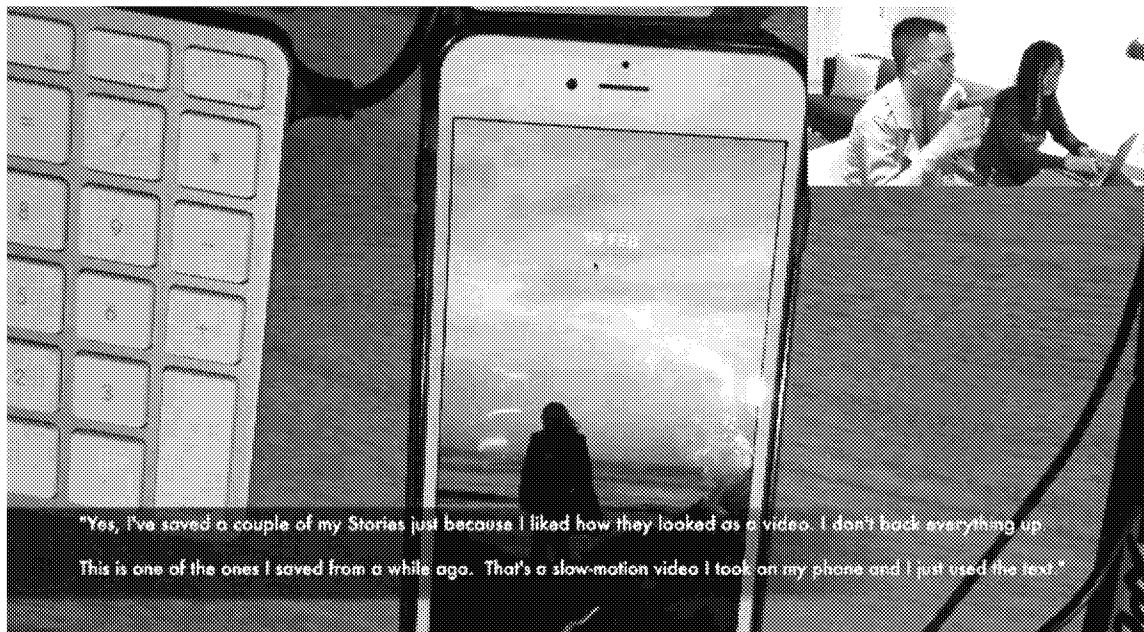


For a teen who has both public and private (Finsta) accounts, she showed which parts of her dream profile would be private to herself, private to a subset, and public to everyone in this Participatory Design.



#### WHAT WE'RE DOING:

- Archive: Since people feel a lack control over how sharing impacts their profile, the Feed Sharing & Profile team brainstormed, storyboarded concepts, tested, and launched Archive to address this people problem, giving people more control and help them express themselves freely in their profiles.
- Another people problem centers around Profile being used as a "quick view of who I am" rather than "a visual record of my life." Timely self-representation is important, especially to teens as the high rate of deletion reveals, and both IG and Snapchat Stories have cannibalized Feed Sharing as a lightweight way of daily sharing. At the same time, we found that people sometimes wanted to showcase their IG Stories more permanently than 24 hours (see Saved Stories Survey Results and Archiving & Storytelling: Instagram Profile Archive & Saved Stories Study) At our design sprint in February, the team brainstormed ideas on how to address this people problem.



"I want to express myself everyday but not ruin the precious profile grids."

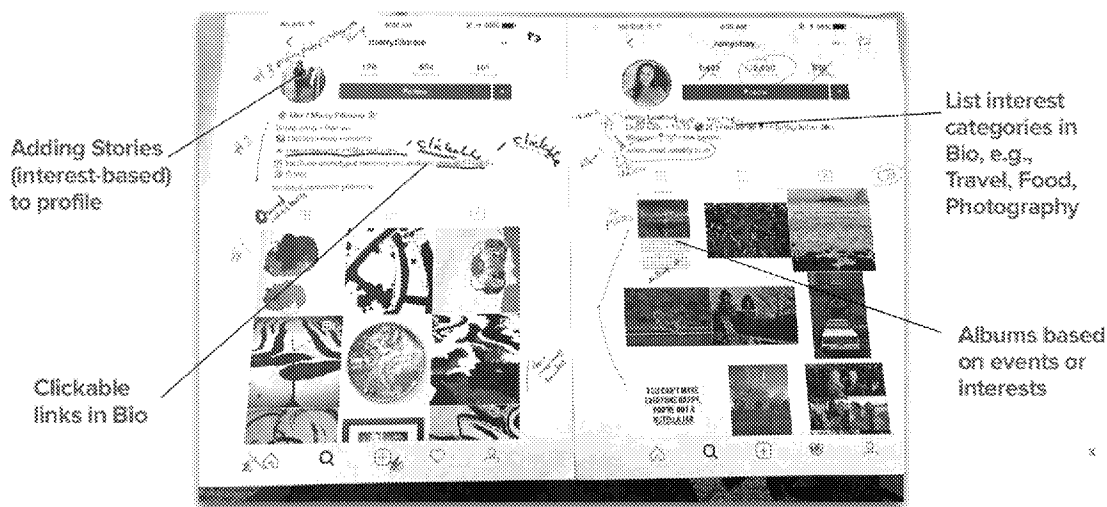
◦ WHAT WE'RE DOING:

- Saved/Archive Stories and Cover Stories/Stories Highlights: One idea that has resonated with people (see [study here](#)) is the idea of saving Stories in the Archive and then being able to curate and feature them in a Cover Story on their profile as a "movie of my life."
  - Carousel: The focus of this Note has been on Profile research since Feed Sharing ties so closely to the Instagram Profile, but another feature we launched earlier this year that increased Feed Sharing and addressed the people problem of being able to share more than 1 media per day was Carousel, multiple images and videos in one post. We are currently working on non-square Carousels, the top requested feature (read more: [Carousel In-App Surveys Results](#)).
- From a consumer's post of view, a private IG profile gives little information about a person, and people who have private accounts also want to share more information, especially about their interests, which they often "hack" in their bio.
    - The first 3 points are focused on self-profile, but people also love viewing other people's profiles (see [Kevin Huang's data analysis on "profile stalking"](#)). There are 4.0 B unique Profiles Views on Instagram, and 95% of those are on other people's. However, 25% of unfollowed private profile views are on a blank lock page. Private account holders seek more self-representation, and in turn, followers have a difficult time determining whether a profile belong to a friend based on a small profile photo. Bios and Profile photos are parts of the profiles that people, especially Teens, update frequently.

"You get a lot of little icons and names, and some of them are public or private. I wish there was bio or location info so I can decide how similar people are to me."

"I would like a setting where I could put a few photos up that represented who I was."

When designing their dream profile page, people show they want to delineate interest-based content in their profile, such as interest categories, contact information, and multiple websites in their Bio.



◦ WHAT WE'RE DOING:

- Expressive Bio: Expressive (links in) bio allow users to better express their unique identity by featuring things, people, or concepts they care most about. This concept resonated positively with people(see [study here](#)).
  - Actionable Profile: We are exploring different actions that one can see when tapping on a person's profile including sending a Direct Message to confirm identity.
- Lastly, with all these features and additional ones from the Instagram ecosystem, it's important to keep Instagram's profile framework simple and easily understandable. After 3 rounds of card sorts, we found the hierarchy for self-profile was Main ID, Basic Info, Photos and Stories, Follower Info, and Settings. For consumption, Social Elements ("Discovery" and "Connecting with People") were more important when viewing other people's profiles (see [more here](#)). Cathy Lo shows some great visual diagrams of the Profile Framework below:

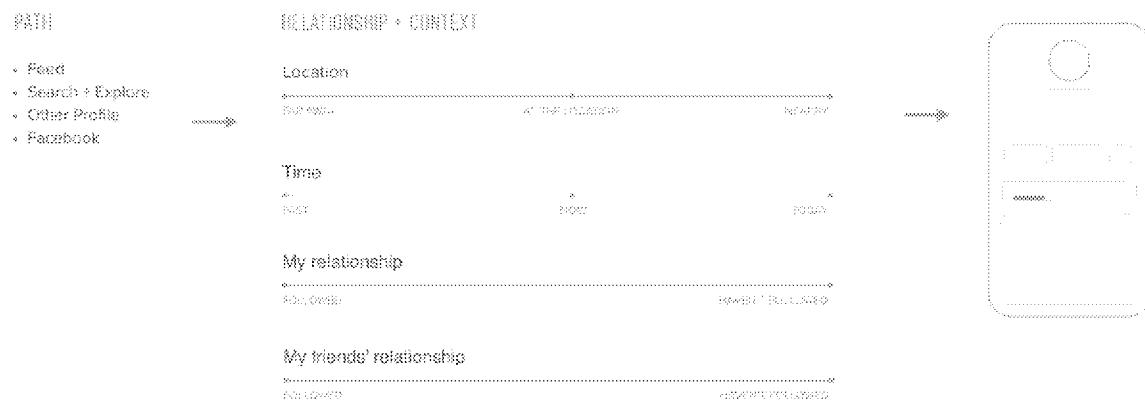
## MODULES

Social elements are more important when viewing other's profiles. Message and Favorites were elements that didn't belong to any groups. Elements are listed in the order of importance.

|             |                        | People | Influencers | Businesses |
|-------------|------------------------|--------|-------------|------------|
| Main ID     | Profile Pic            | X      | X           | X          |
|             | First Name + Last Name | X      | X           | X          |
|             | User name              | X      | X           | X          |
| Basic Info  | Bio                    | X      | X           | X          |
|             | Website Link           | X      | X           | X          |
|             | Grid View              | X      | X           | X          |
| Photos      | List View              | X      | X           | X          |
|             | Tagged Photos          | X      | X           | X          |
|             | Active Story           | X      | X           | X          |
| Stories     | Stories Highlights     | X      | X           | X          |
|             | Add to Your Story      | X      | X           | X          |
|             | Follow Button          | X      | X           | X          |
| Follow Info | Following Count        | X      | X           | X          |

Cathy Lo, Instagram designer, lists the facets of an Instagram Profile by importance for People, Influencers, and Businesses

## RELATIONSHIP + CONTEXT



Cathy Lo, Instagram designer, shows the paths to visiting someone else's profiles, and the contexts/relationships you may have with that person

## PURPOSE + BEHAVIOR



Cathy Lo, Instagram designer, shows the purposes and behavior a profile owners wants to accomplish

### ◦ WHAT WE'RE DOING:

- Design and Research began work on Experience Principles, but we've paused the Profile Framework Redesign effort and launched a temporary Profile Update at this time. There is future opportunity to continue this exploration.

Thanks to all those who I have referenced in this Note and worked with on FS&P research since November 2016! Kevin Huang, Cathy Lo, Yichen Wang, Diana Frurip, Ian Silber, Shannon Ma, Andrew Prince, Ryan Scott Tandy, and the rest of the FS&P team - I've had a great time working with you and will be transferring to FB Groups on Monday. All my research lives at <https://fburl.com/igfspresearch>.  
[Contact Support](#)

## Conversation History

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