AMENDED Exhibit 255

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Goals of the product audit

1. **Familiarize the team** with the product space and latest best practices
2. **Highlight gaps** in our existing **product solutions**, to suggest reasonable areas of opportunity
3. Shine light on **how we might approach People Problems** and the problem space. Ex:
    a. For PU, the audit demonstrated the need for boundaries around the space and a success statement.
    b. For SSI, the audit surfaced areas where we lack consistency across our existing interventions.

Central Well-being
Problematic Use
Ideation Session | CWB x IGWB

Agenda

1. Team introductions
2. Problematic Use: Problem Space Context
3. Specific Areas of focus
4. Brainstorm
5. Next steps / (TBD) Discussion

This does not address:

1. **Maturity** of the solutions presented, which will come from our success definitions and frameworks
2. Very early-stage Meta **concepts still in the ideation** phase

Well-being

Context

Problematic use is a perceived lack of control over technology use with negative life impact. [1]

(e.g. sleep, parenting, social relationships, or productivity).

Well-being

What success looks like (updated)

People have the tools that they need and are empowered to control their time and experiences on our platforms. [2]

Well-being

What success looks like

People feel their time on the platform is worthwhile and are empowered to manage their experiences.[2]

Well-being

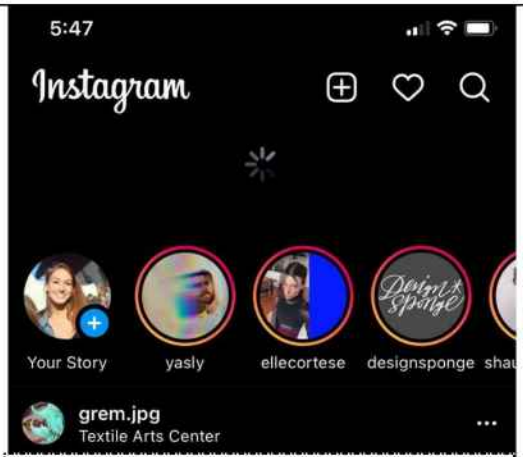
Common narratives [3]

1. Social media is addictive
2. Facebook disconnects people from real social interaction
3. Time spent on social media has negative implications on behavior and health

Well-being

Examples of criticized product mechanics

- Endless feeds
- 'Slot machine' pull-to-refresh
- Auto-play mechanisms
- Notifications & actions that happen 'to you'
- "The Algorithm"



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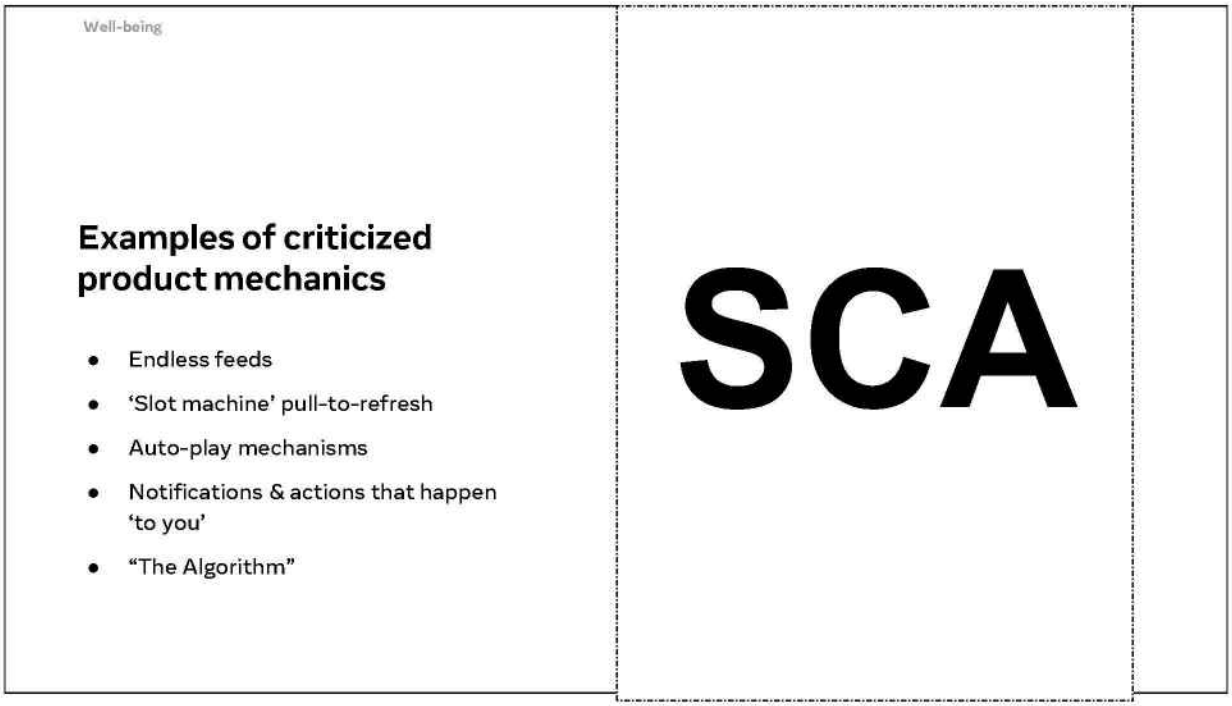

Well-being
Examples of criticized product mechanics
Endless feeds
'Slot machine' pull-to-refresh
Auto-play mechanisms
Notifications & actions that happen 'to you'
"The Algorithm"
SCA

Challenges

- Problematic Use is difficult to measure, in part because there's no widely-shared definition
- Many of these experiences overlap with other well-being pillars, like Bullying & Harassment, or Meta initiatives, like integrity.
- Current measurement relies heavily on self-reporting and recall
- ~~We're not aligned on a definition of success~~

Well-being

A proposal: How we get to product opportunities

1. Define what the problem(s) look like for Problematic Use
    a. Start with our definition
    b. Identify existing solutions and the actions/behaviors they support, reverse-engineer problem themes
2. Assess: Are current solutions enough? If yes, ensure parity of existing solutions in relevant spaces. If no, create novel solutions to fill gaps
3. Ask: Are there entirely unaddressed themes?

Well-being

Based on this approach and the following audit, People Problems:

1. I don't have control over the amount of time I spend on [Meta products].
    a. I spend more time than I'd like to (rabbit-holing, doom scrolling)
    b. I'm afraid I'm missing out on something I'd want to see (Content FOMO, checking, refreshing).
2. I feel pressure to respond to other people interacting on the platform (Ex. Anxiety to address notifications)
3. I don't have control over the content I see [on Meta products]
4. Meta problem: People are not aware of the tools available to set necessary boundaries.

Well-being

Based on this approach and the following audit, proposed themes / people problems:

1. **Problematic time spent:** I spend more time than I'd like to on [Meta products].
2. **I feel pressure to respond** to other people interacting on the platform (Anxiety to address notifications)
3. I'm afraid **I'm missing out** on something I'd want to see (Content FOMO).
4. **Meta problem:** People are not aware of the tools available to set necessary boundaries.

Well-being

Solutions Gaps

**Existence of product work, not maturity of the product solution

	Facebook App	Instagram	Messenger	Oculus / RL	WhatsApp	Necessary Parity	Company-level Solution Opportunity?
Features: Tools, Resources & Interventions							
Endless Scrolling	Tested	Tested	N/A	N/A	N/A?	Probably not achieved	No?
Time Spent: Pull	Yes	Yes	N/A?	No	N/A?	No	Yes
Time Spent: Push	No	No	N/A	No	N/A?	?	TBD
Tools for focus/time away	Limited	No	No	No	N/A	No	Yes
Content FOMO	Limited	Limited	N/A?	N/A?	No?	?	TBD
Auto-play options	Limited	No	N/A	N/A?	N/A	?	TBD
Amplification							
Achieved X awareness success	Some	No	No?	No	No	N/A	N/A

Well-being

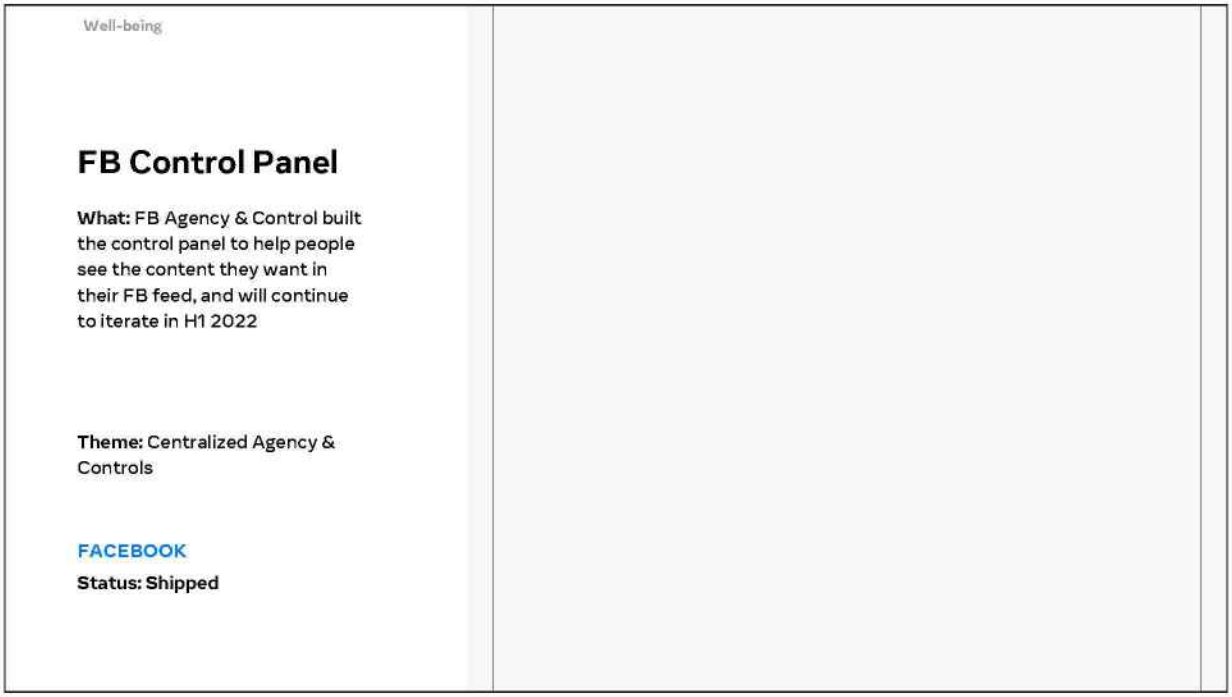
Internal

Product Audit

The stance we have historically taken is to give people control, but not in a way that hurts metrics.*

- Tools to help people set and maintain boundaries
- Nudges, interjections, and reminders to use tools
- Tools for stepping away
- End endless scrolling

*Of note, a significant milestone was introducing the MSI metric to change how we think about success



Influencer vids
https://www.instagram.com/reel/CXMW9gEpa8E/

Well-being

FB Control Panel

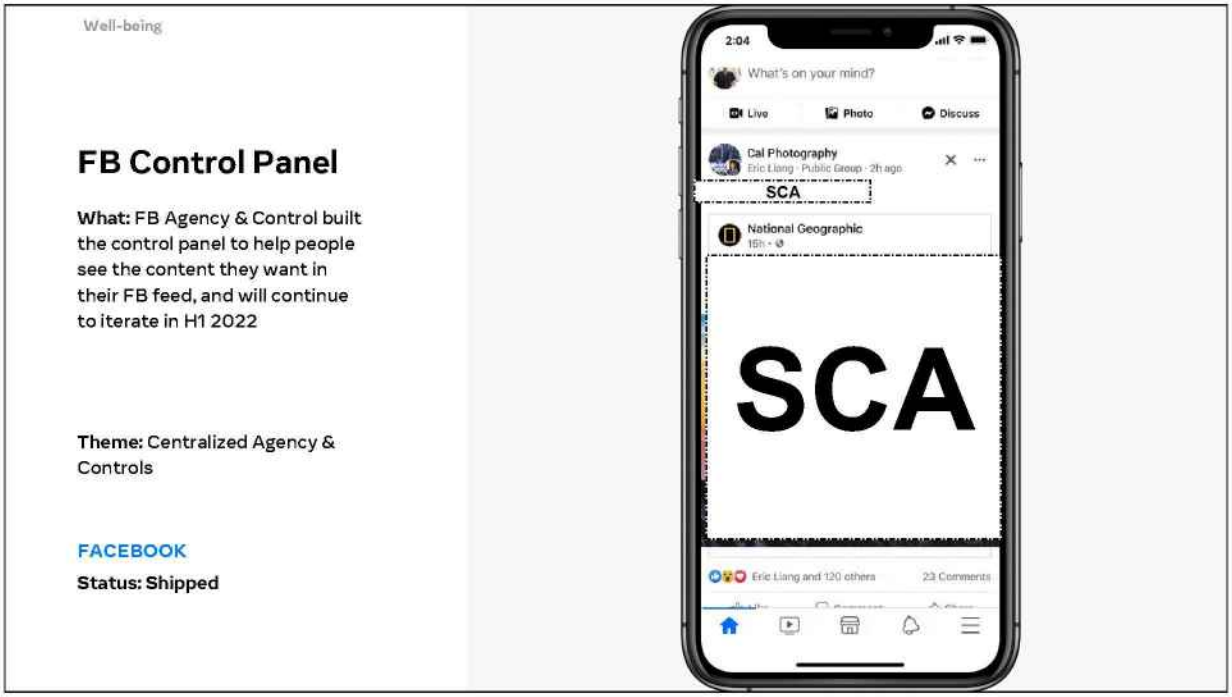
What: FB Agency & Control built the control panel to help people see the content they want in their FB feed, and will continue to iterate in H1 2022

Theme: Centralized Agency & Controls

FACEBOOK

Status: Shipped

Influencer vids
https://www.instagram.com/reel/CXMW9gEpa8E/



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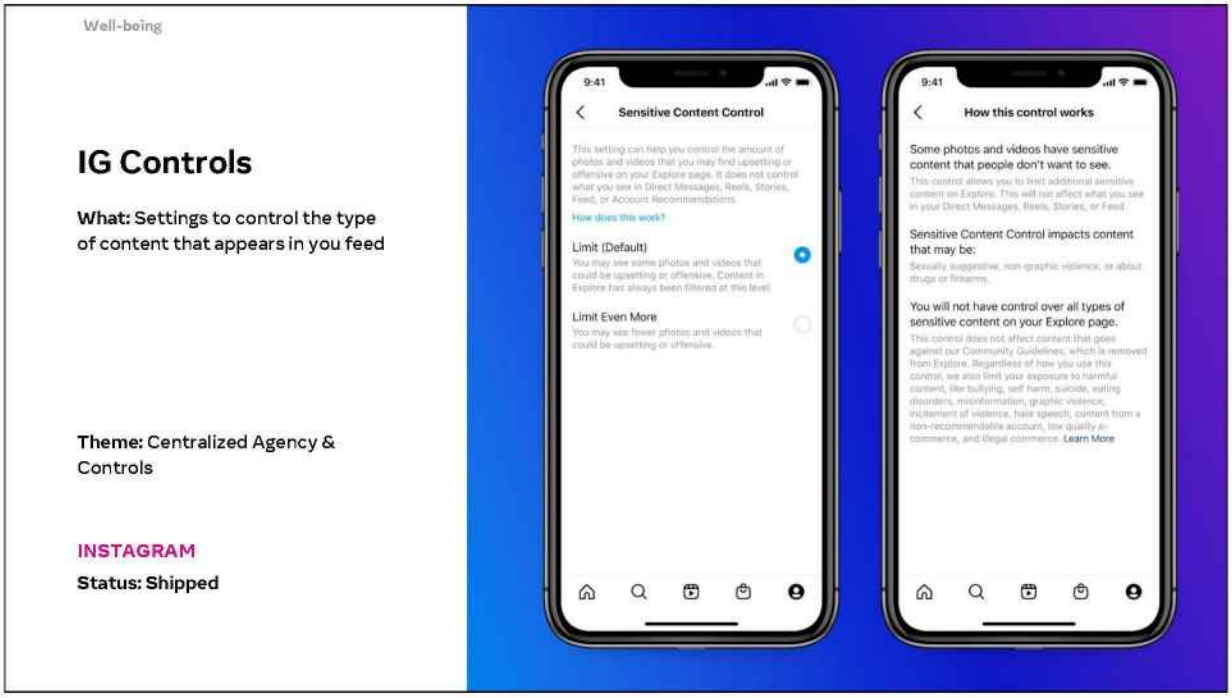
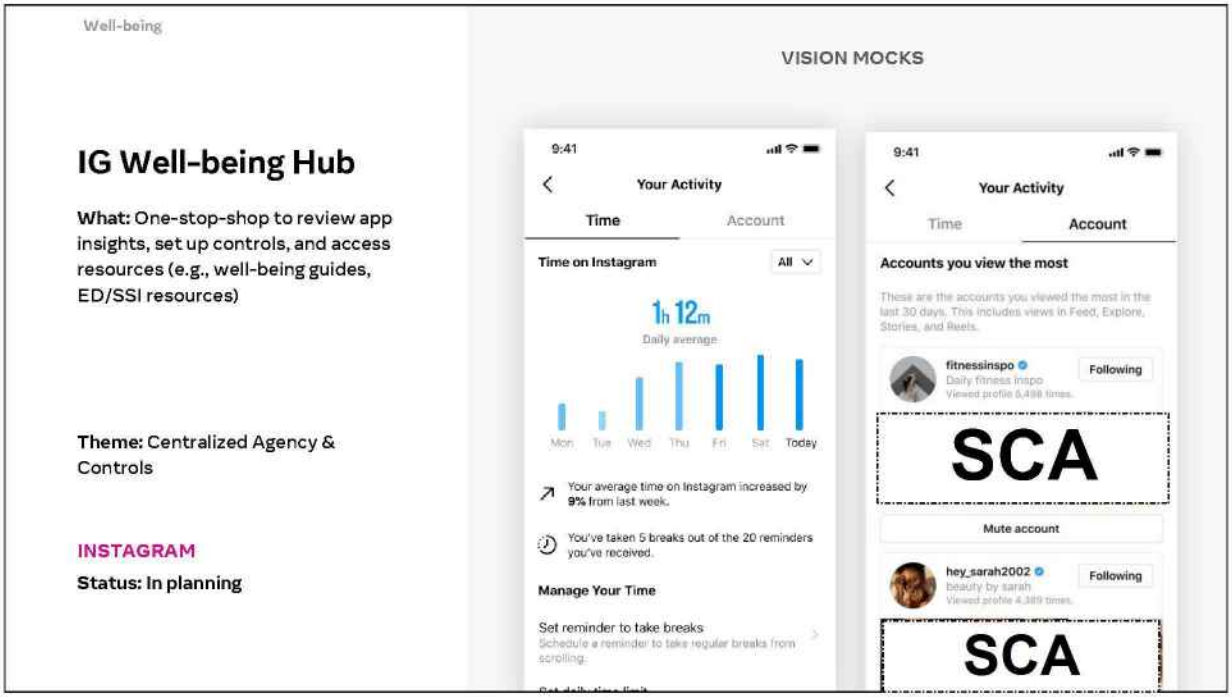


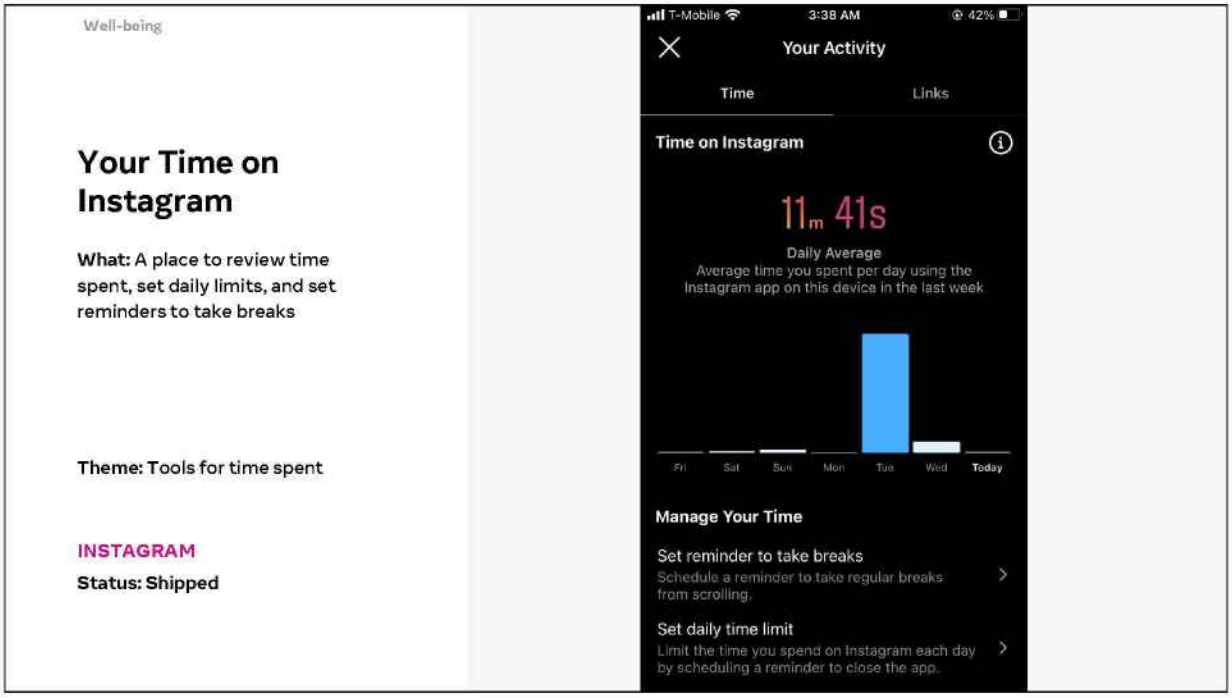
We're exploring expanding the "Limit Even More" state beyond Explore for teens. This will make it more difficult for teens to come across potentially harmful or sensitive content or accounts in Search, Explore, Hashtags, Reels and Suggested Accounts. We're in the early stages of this idea and will have more to share in time.

Dec 7 2021, https://about.instagram.com/blog/announcements/raising-the-standard-for-protecting-teens-and-supporting-parents-online



Developing new features to make Instagram safer for teens
We'll stop people from tagging or mentioning teens that don't follow them
We'll be stricter about what we recommend to teens in Search, Explore, Hashtags and Suggested Accounts
We'll start nudging teens towards different topics if they've been dwelling on one topic for a while
Earlier this year, we began defaulting teens into private accounts when they signed up for Instagram, and we stopped adults from being able to DM teens who don't follow them.
Now, we'll also switch off the ability for people to tag or mention teens who don't follow them, or to include their content in Reels Remixes or Guides by default when they first join Instagram. We're testing these changes to further minimize the possibility that teens will hear from those they don't know, or don't want to hear from, and plan to make them available to everyone early next year.

Dec 7 2021, https://about.instagram.com/blog/announcements/raising-the-standard-for-protecting-teens-and-supporting-parents-online


Well-being
Your Time on Instagram
What: A place to review time spent, set daily limits, and set reminders to take breaks
Theme: Tools for time spent
INSTAGRAM
Status: Shipped
T-Mobile
3:38 AM
42%
Your Activity
Time
Links
Time on Instagram
11m 41s
Daily Average
Average time you spent per day using the Instagram app on this device in the last week
Fri
Sat
Sun
Mon
Tue
Wed
Today
Manage Your Time
Set reminder to take breaks
Schedule a reminder to take regular breaks from scrolling.
Set daily time limit
Limit the time you spend on Instagram each day by scheduling a reminder to close the app.

Well-being

Your Time on Facebook

What: A place to review time spent, set daily limits, and schedule quiet mode time

Theme: Tools for time spent

FACEBOOK

Status: Shipped

Well-being

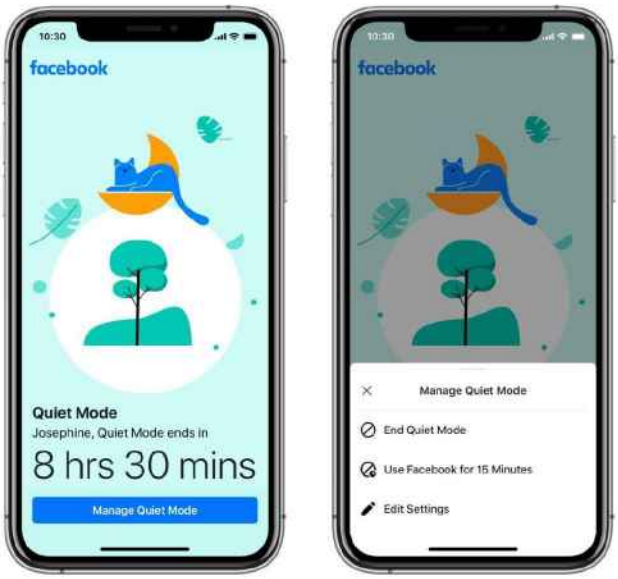
FB Quiet Mode

What: A surface for setting quiet mode' which silences notifications for a determined time and supports focus.

Theme: Tools for focus

FACEBOOK

Status: Shipped



Well-being

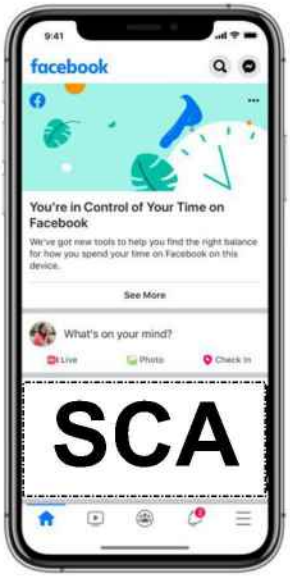
FB "Finding Balance" QP

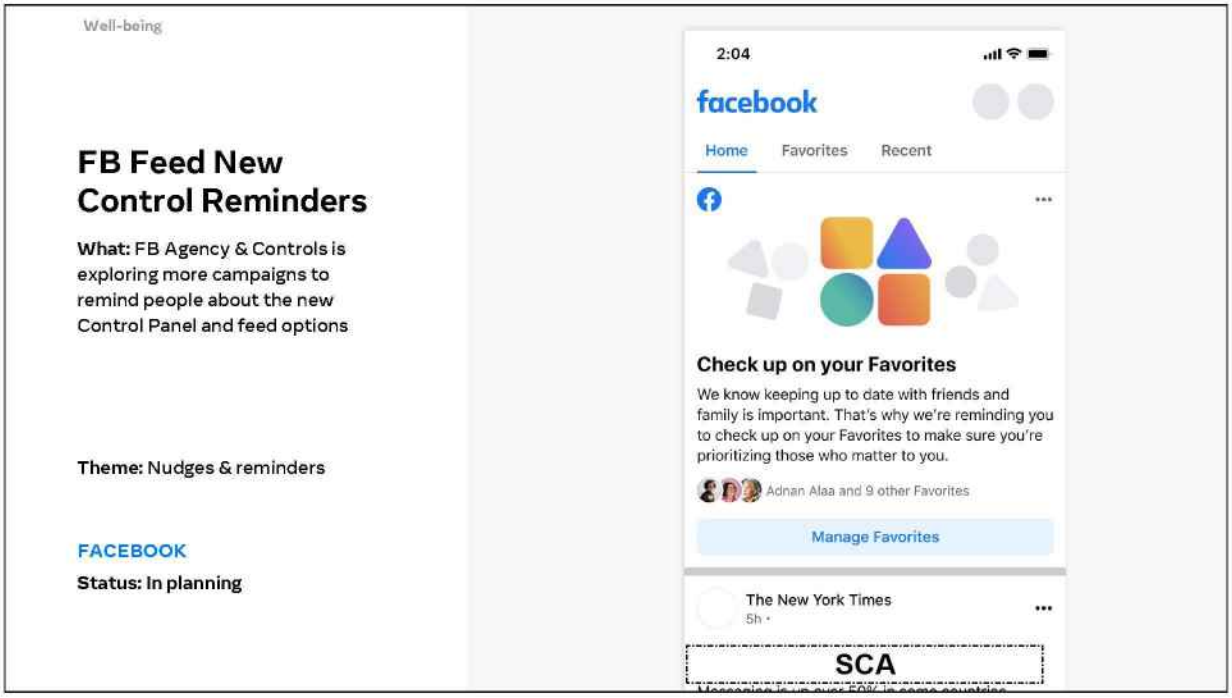
What: A top of feed QP that reminds people about the time well spent tools like quiet time and time spent

Theme: Nudges & reminders

FACEBOOK

Status: Shipped





Influencer vids
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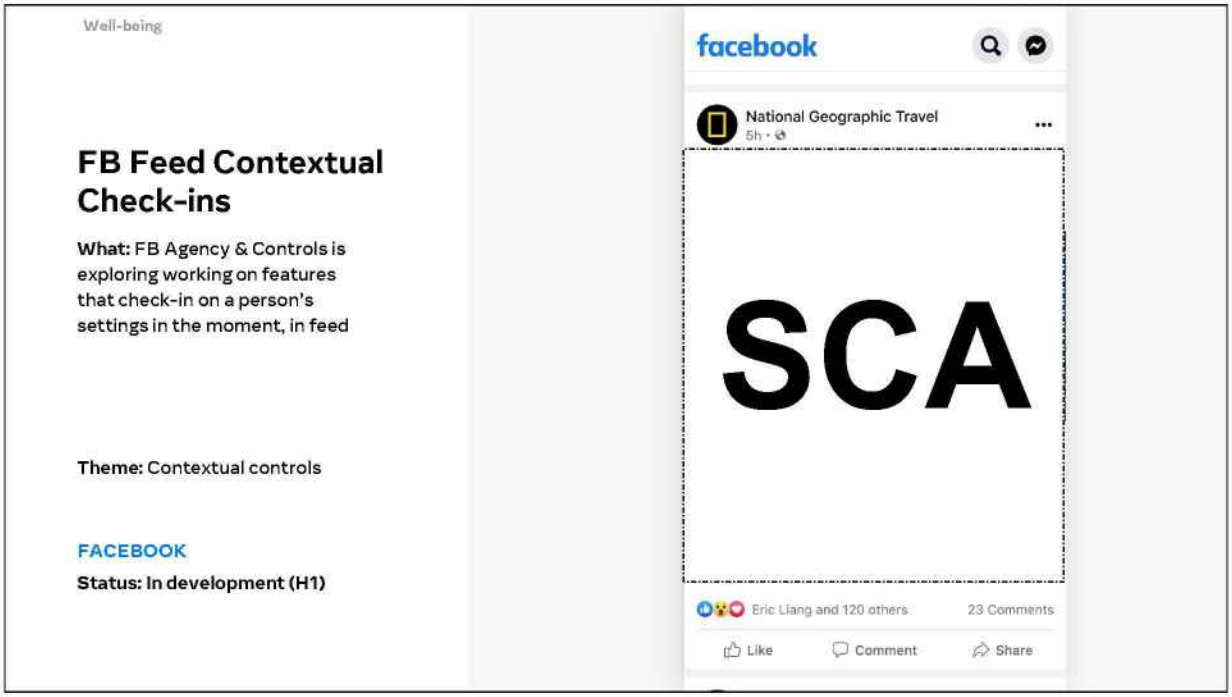

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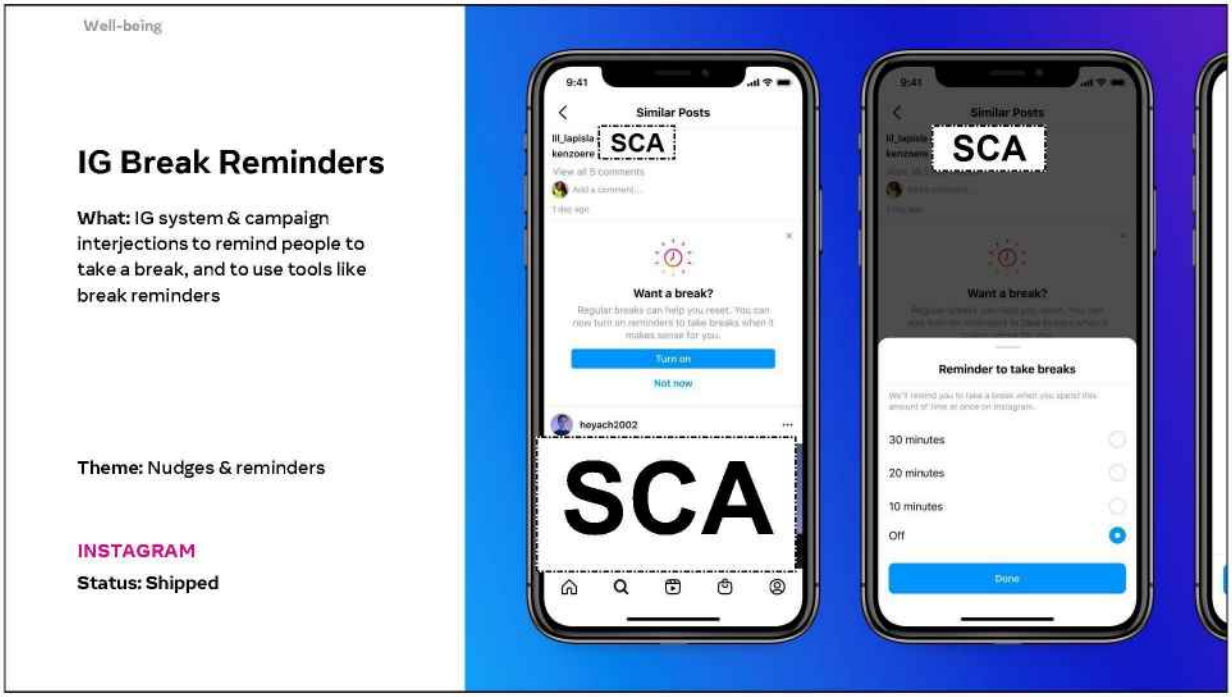

https://fb.workplace.com/groups/igwellbeing/posts/3133910513507316/

Take a Break is now publicly launched on iOS in six countries. Our roadmap for H1 includes expanding on this initial Take a Break launch and launching Topic Nudges. And we have new clarity on our strategy for the space and how we're talking about the work externally. Pavni and Miki have also posted about broader work for teens this fits into. These are all important steps and there are more to come.

THE TAKE A BREAK LAUNCH

Last week we launched Take a Break to iOS users in English languages for 6 countries: US, CA, AU, NZ, IE and UK. The control is available to all users as part of our Time Spent dashboard (via the profile menu from "Your Activity" or "Activity Center"). We also have a contextual upsell for teens based on stated age.

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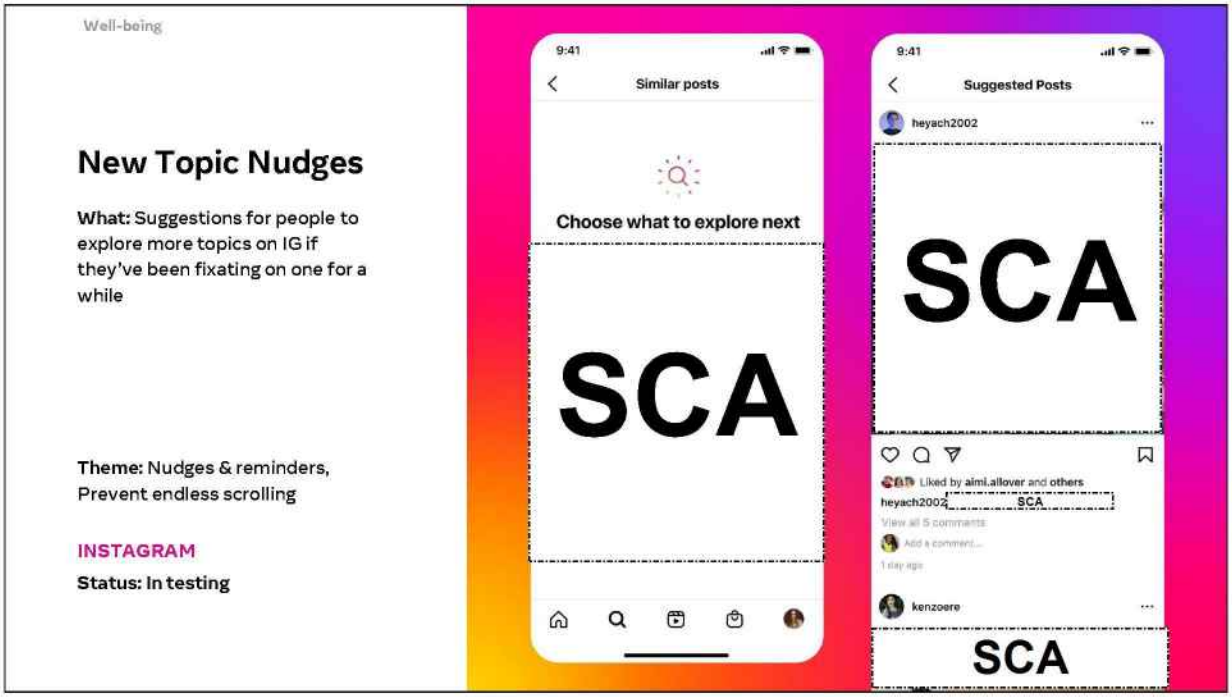
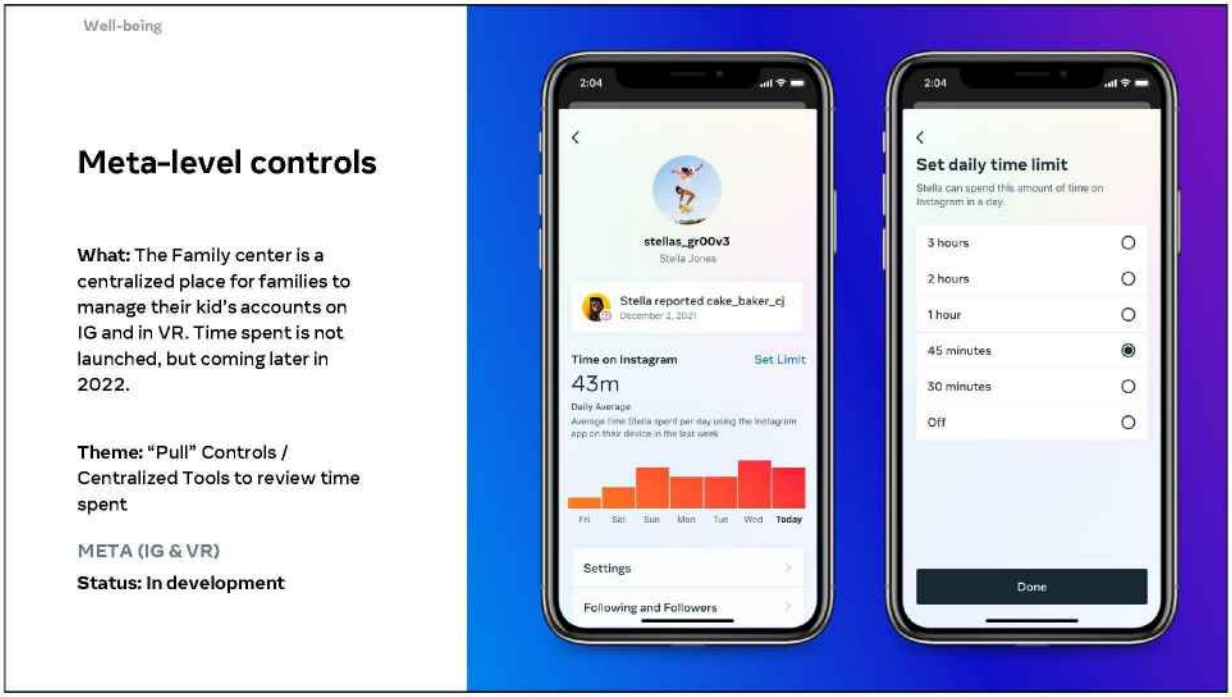


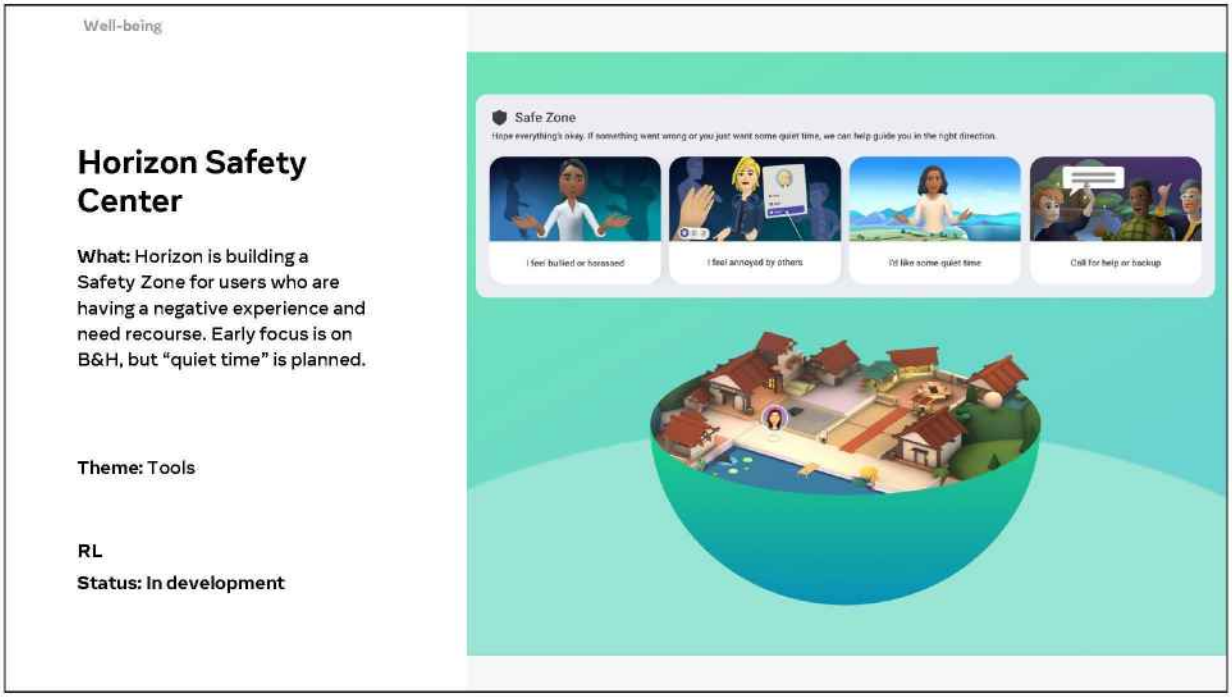
Lastly, our research shows — and external experts agree1,2 — that if people are dwelling on one topic for a while, it could be helpful to nudge them towards other topics at the right moment. That's why we're building a new experience that will nudge people towards other topics if they've been dwelling on one topic for a while. We'll have more to share on this, and changes we're making when it comes to content and accounts we recommend to teens, soon.

Launch in H1 plan
Dec 7 2021, https://about.instagram.com/blog/announcements/raising-the-standard-for-protecting-teens-and-supporting-parents-online



We're also developing a new educational hub for parents and guardians that will include additional resources, like product tutorials and tips from experts, to help them discuss social media use with their teens.

Dec 7 2021, https://about.instagram.com/blog/announcements/raising-the-standard-for-protecting-teens-and-supporting-parents-online



Influencer vids
https://www.instagram.com/reel/CXMW9gEpa8E/

Well-being

Meta-level controls: Family Center

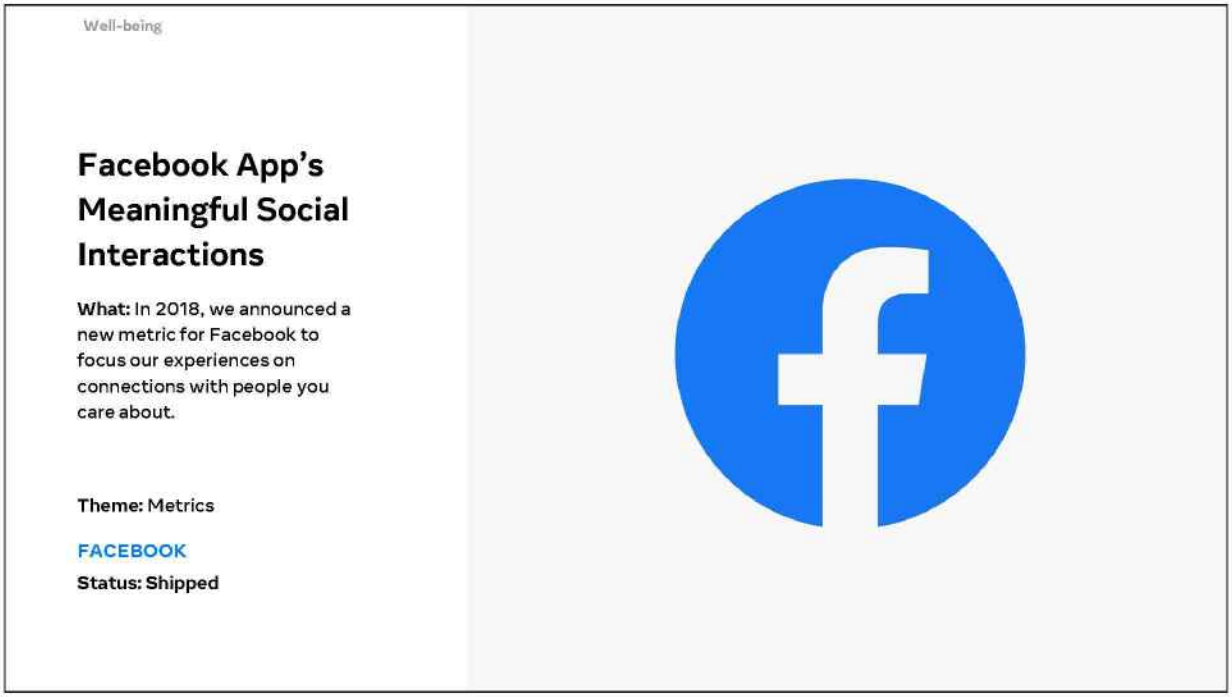
What: The Family center is a centralized place for families to manage their kid's accounts. Time spent is not launched, but might be on the table.

Theme: "Pull" Controls / Centralized Tools to review time spent

META

Status: In development

Influencer vids
https://www.instagram.com/reel/CXMW9gEpa8E/



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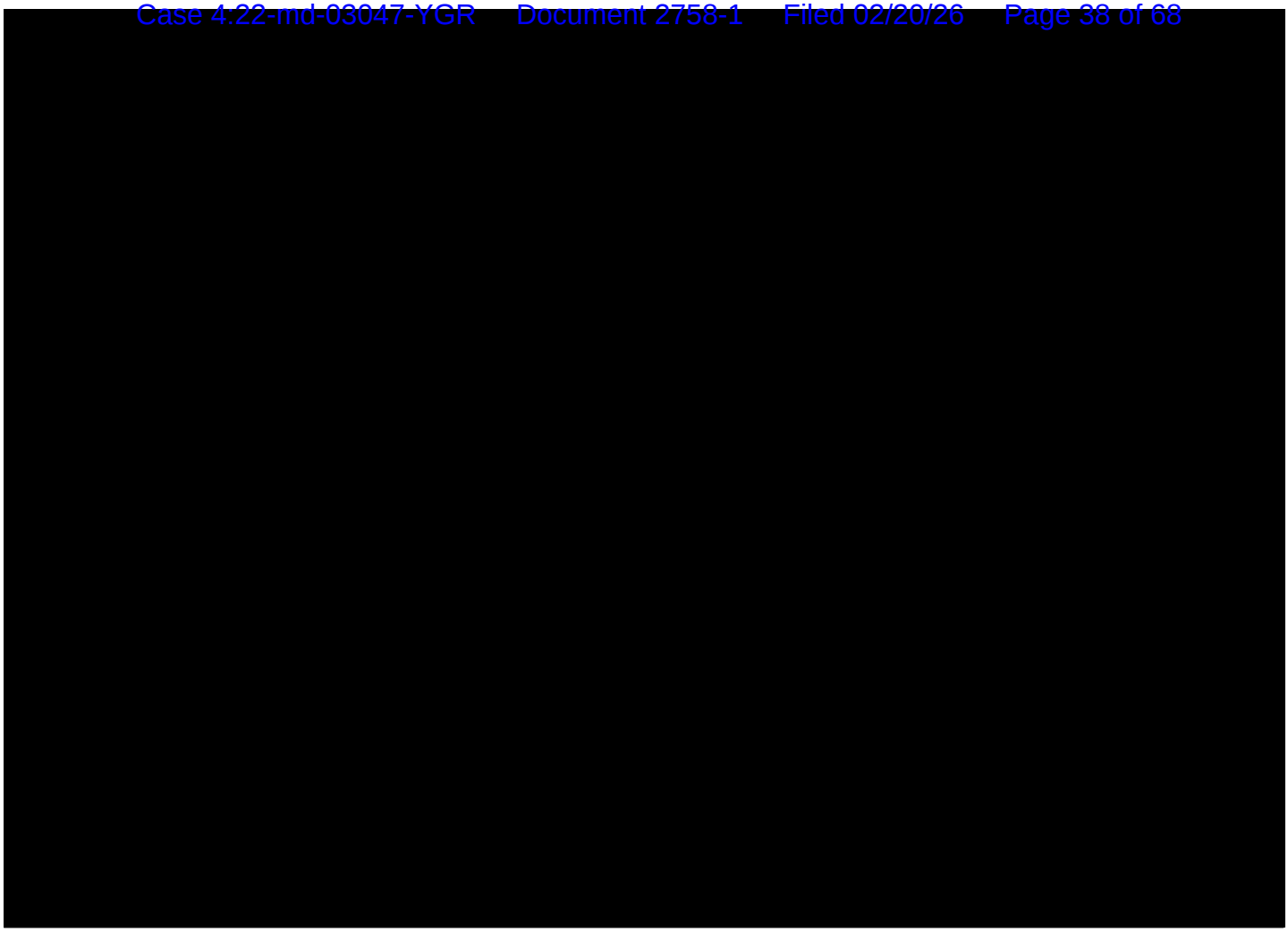
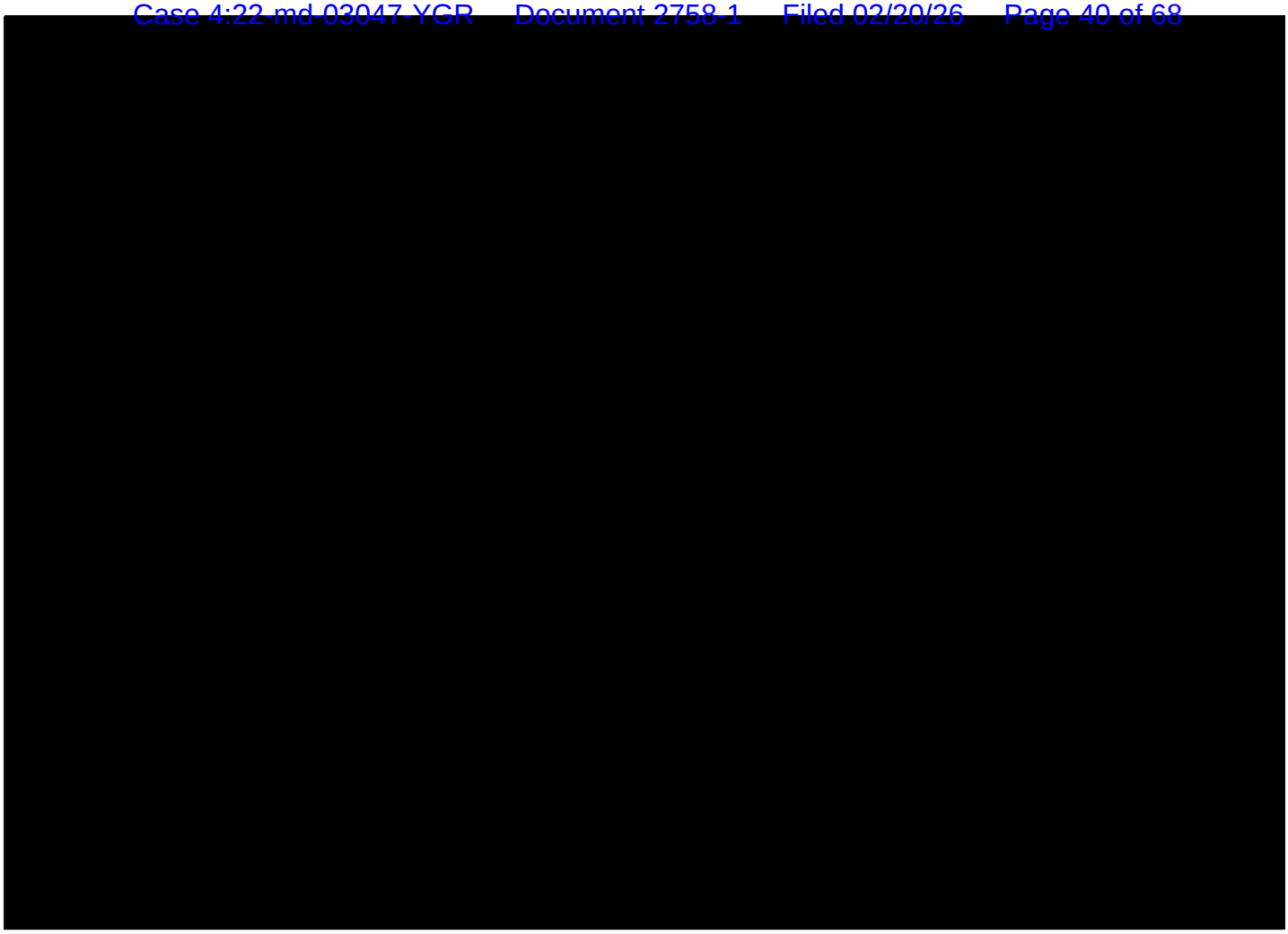
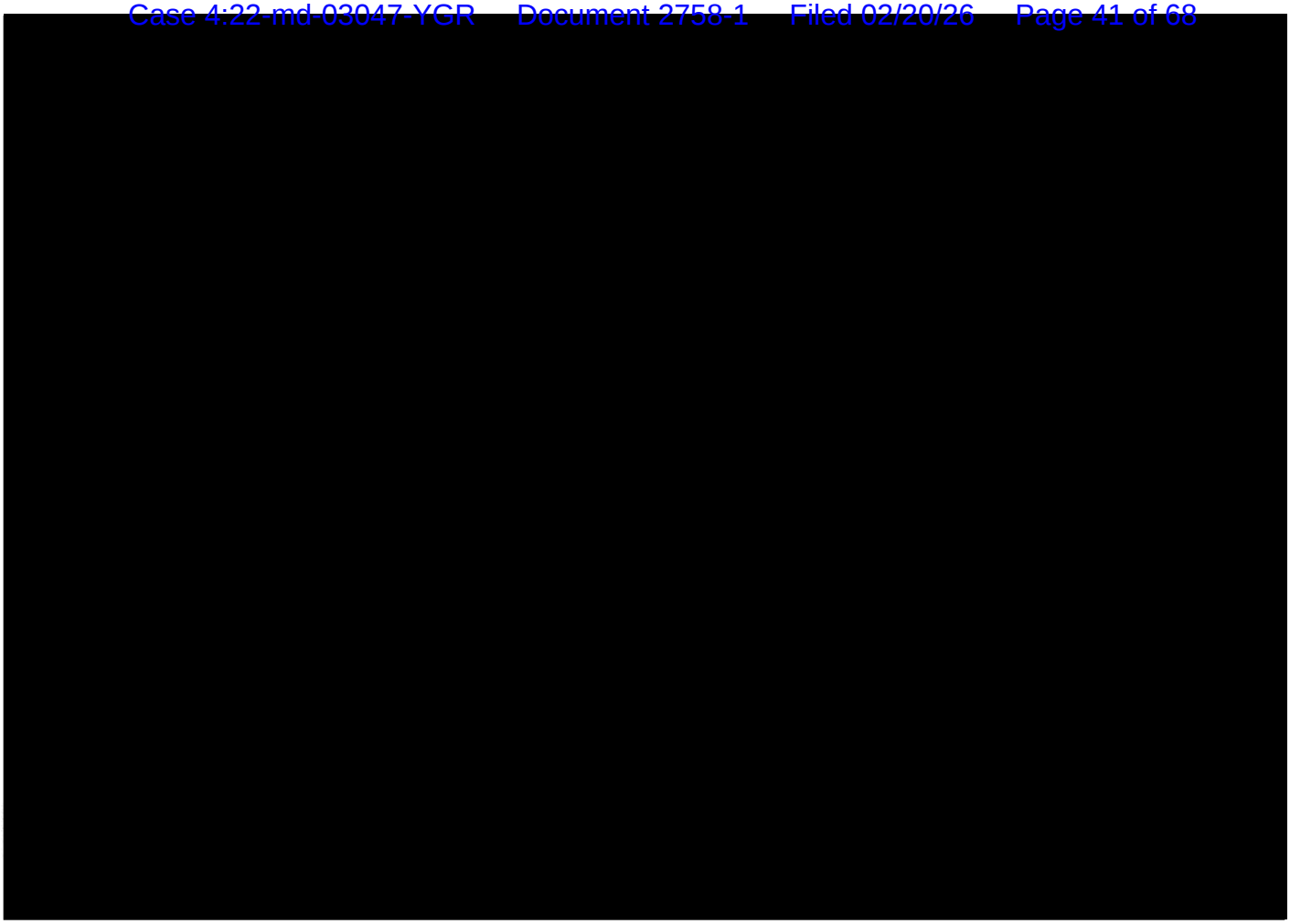
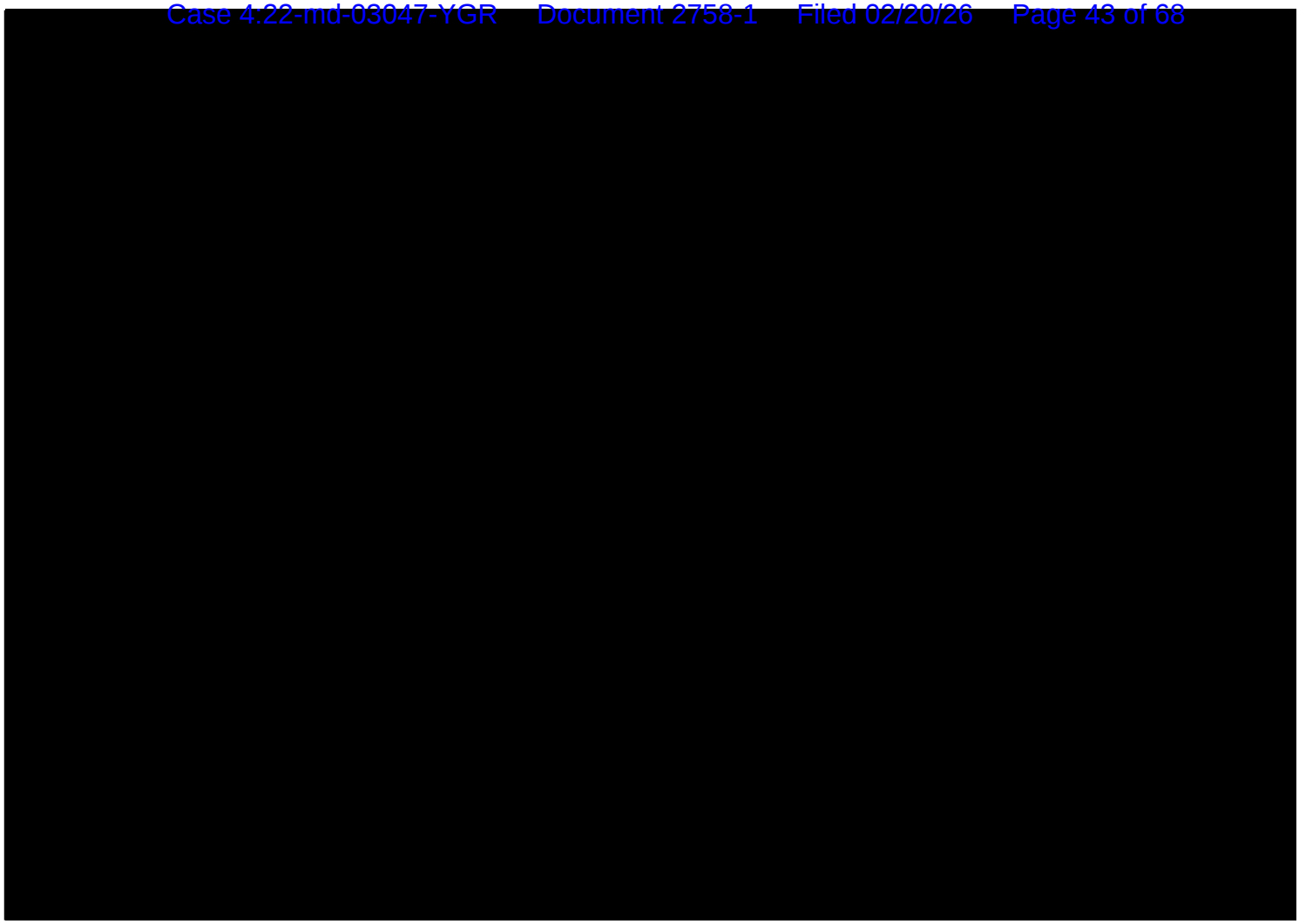
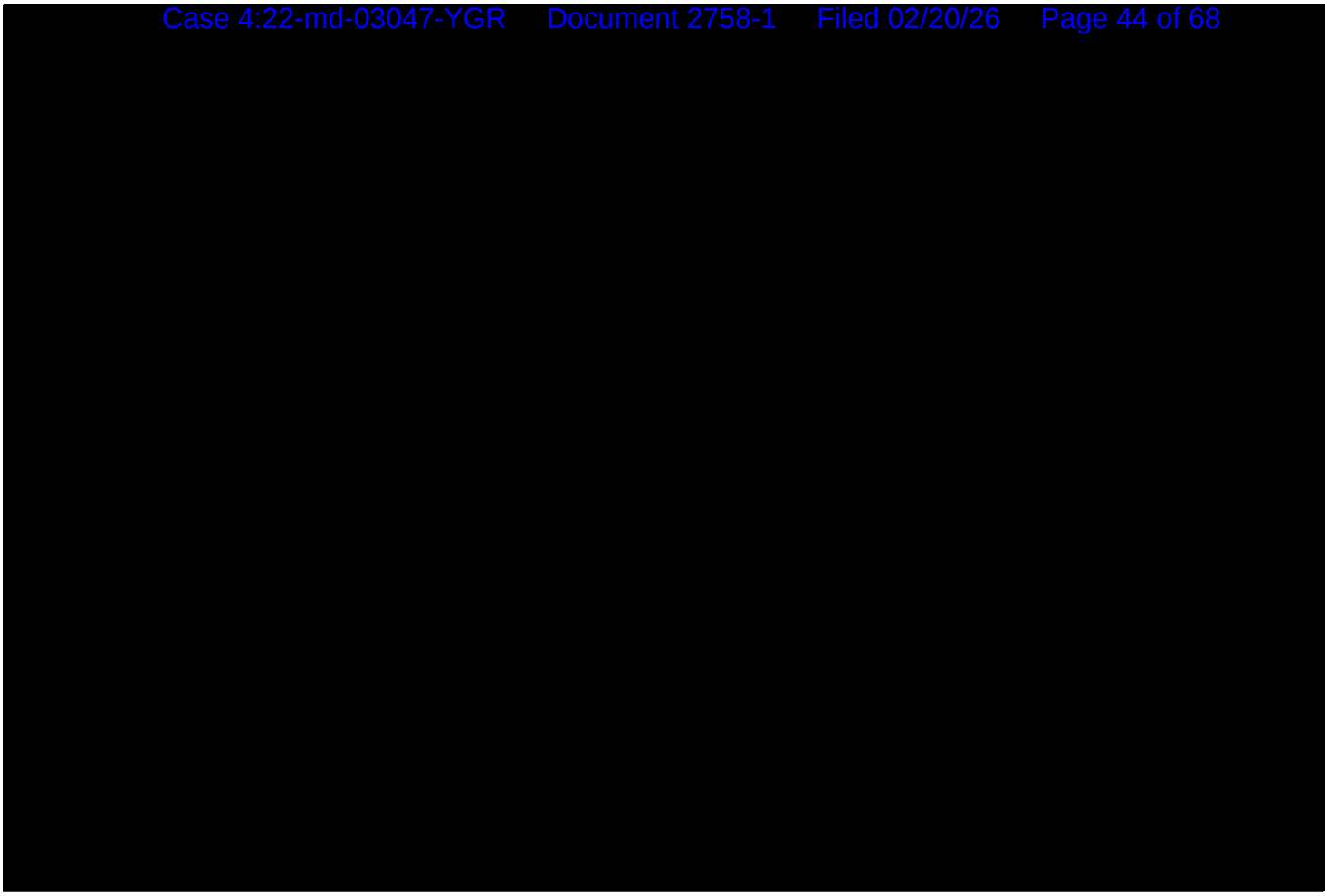
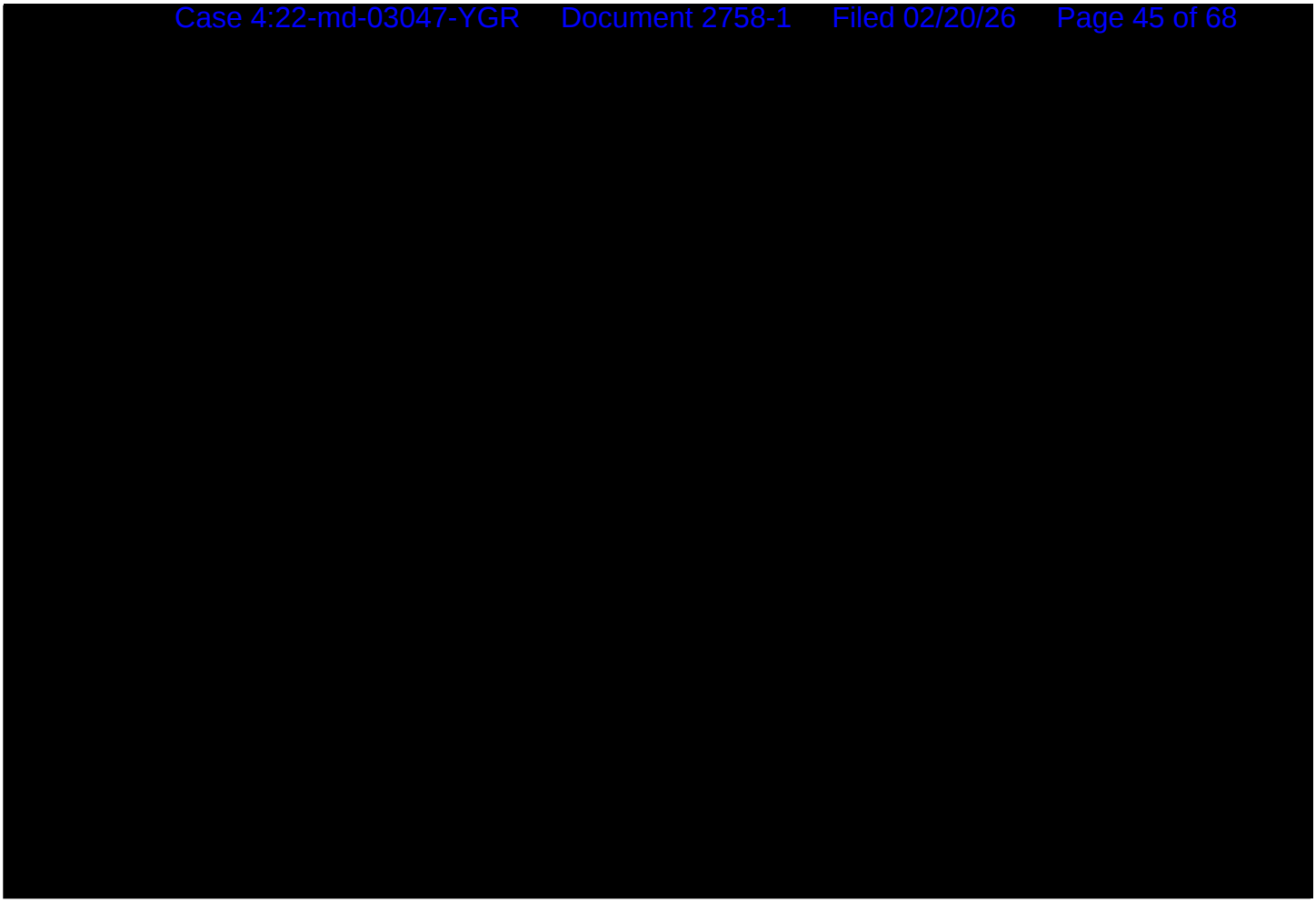
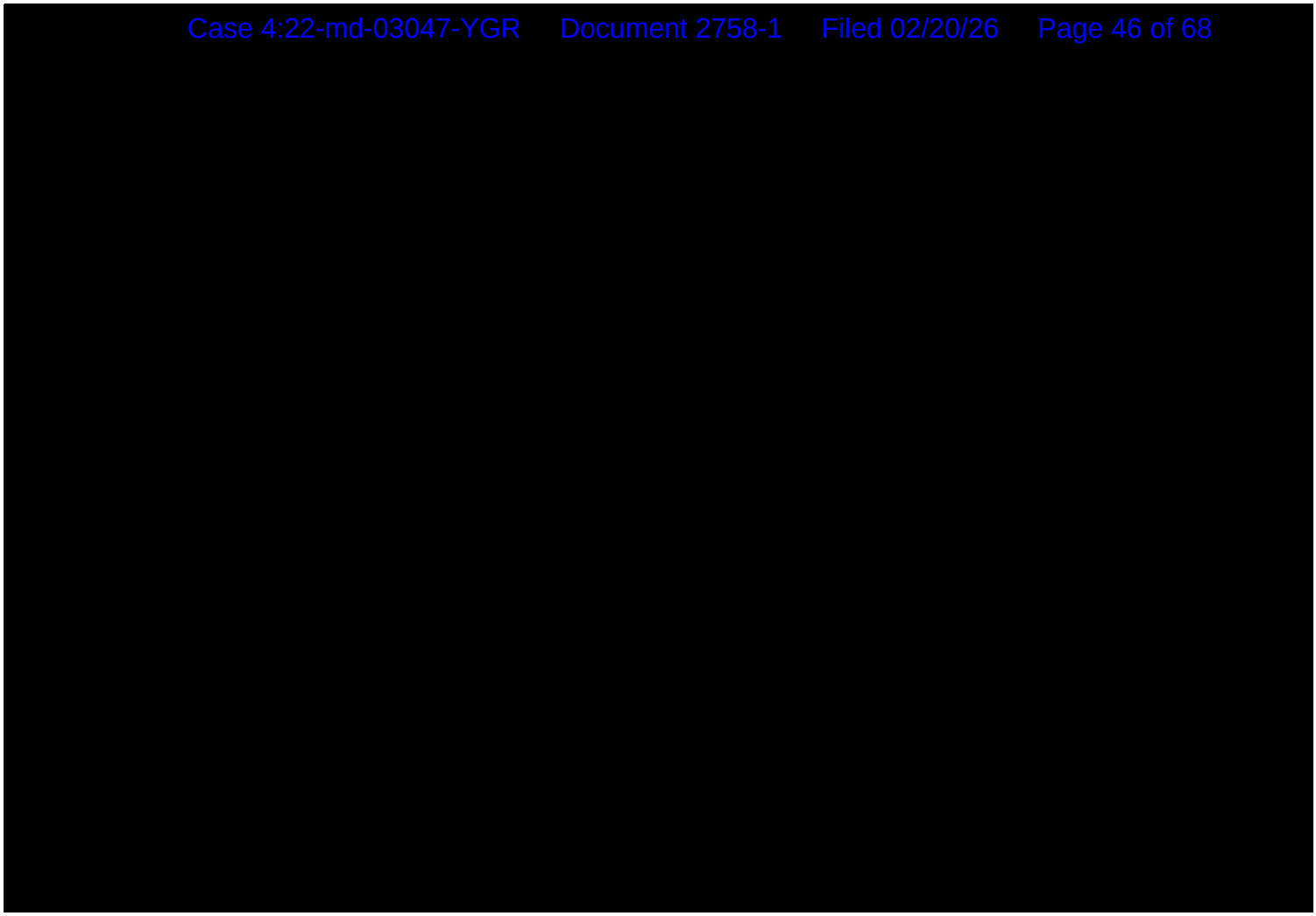
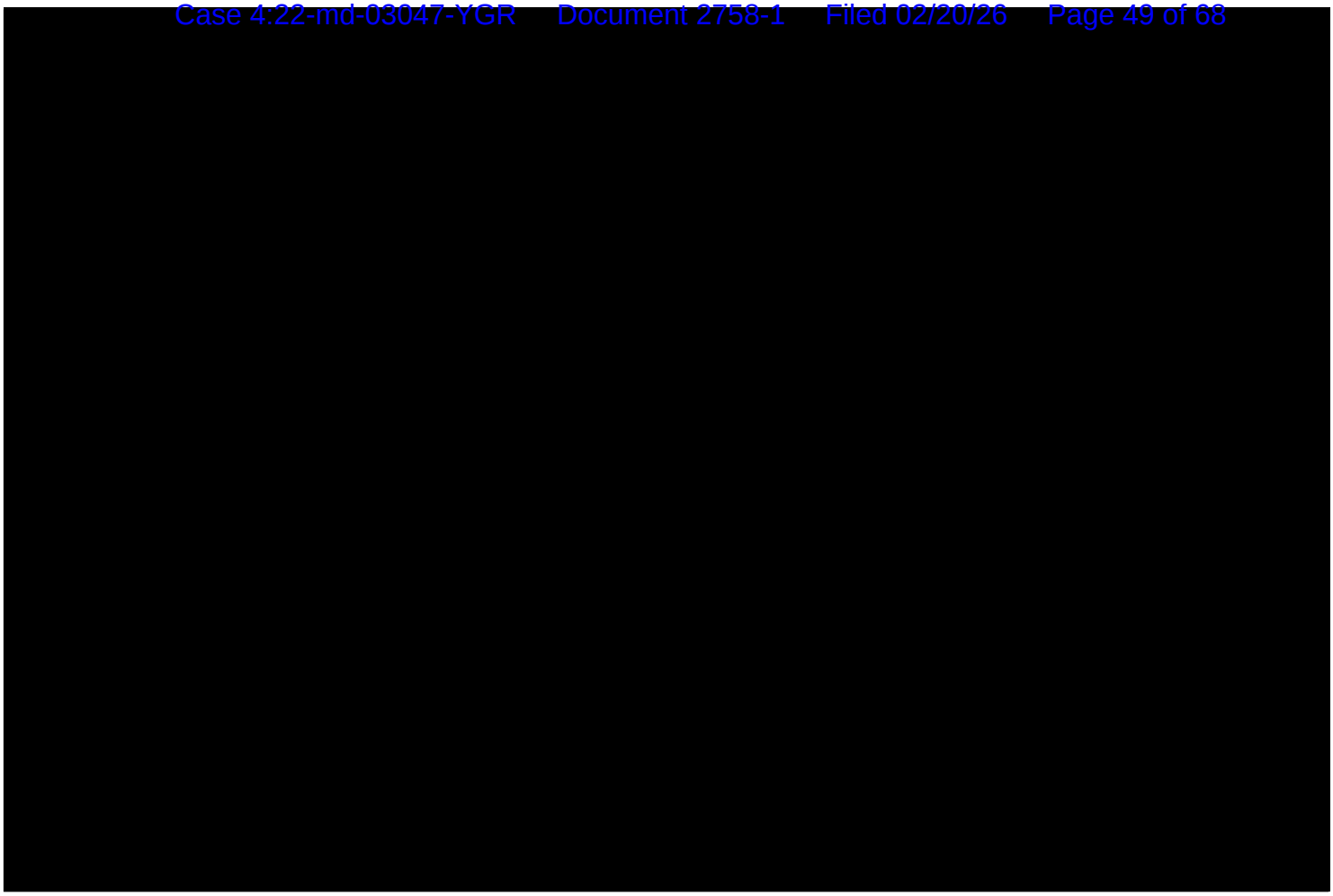
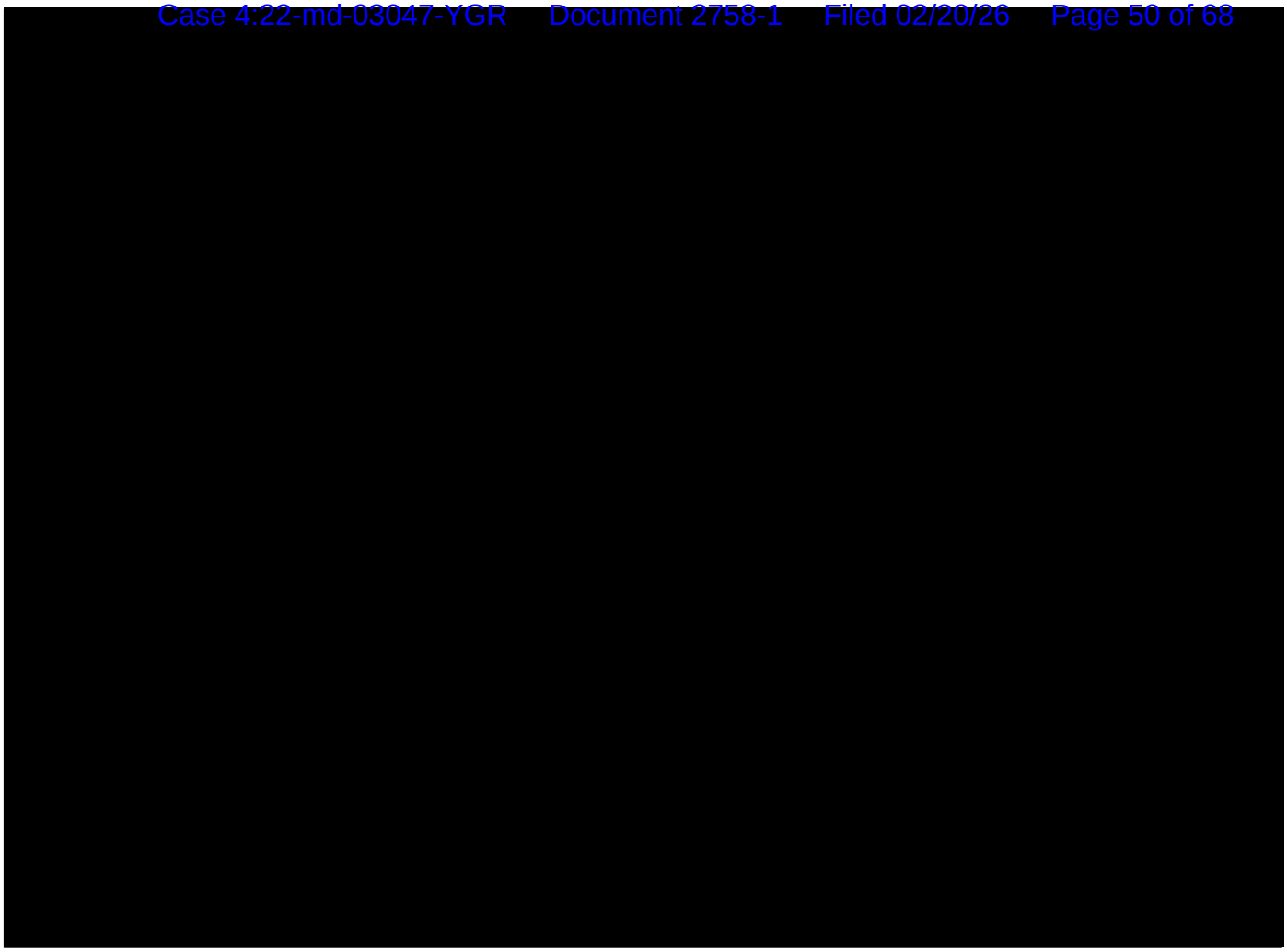
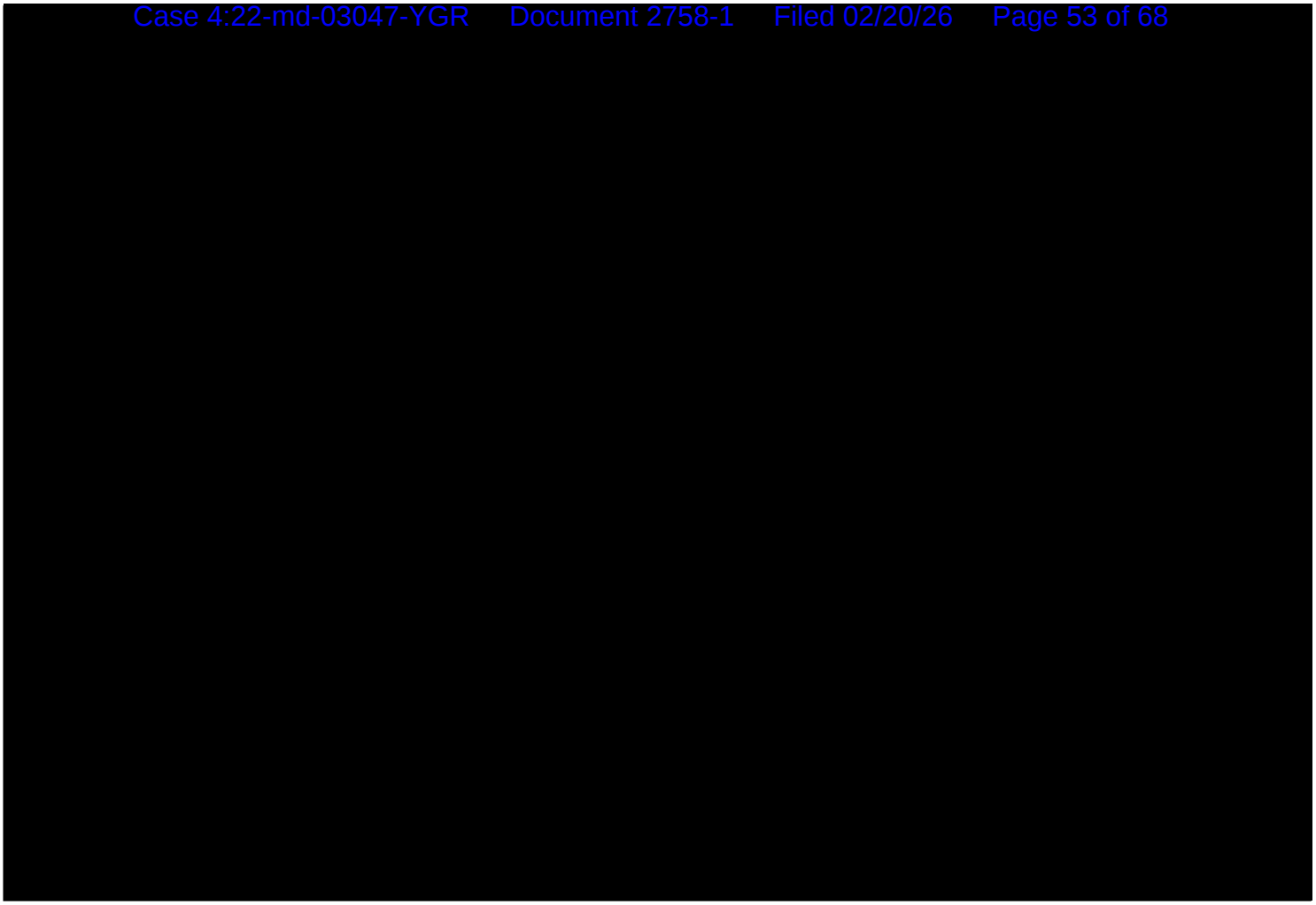
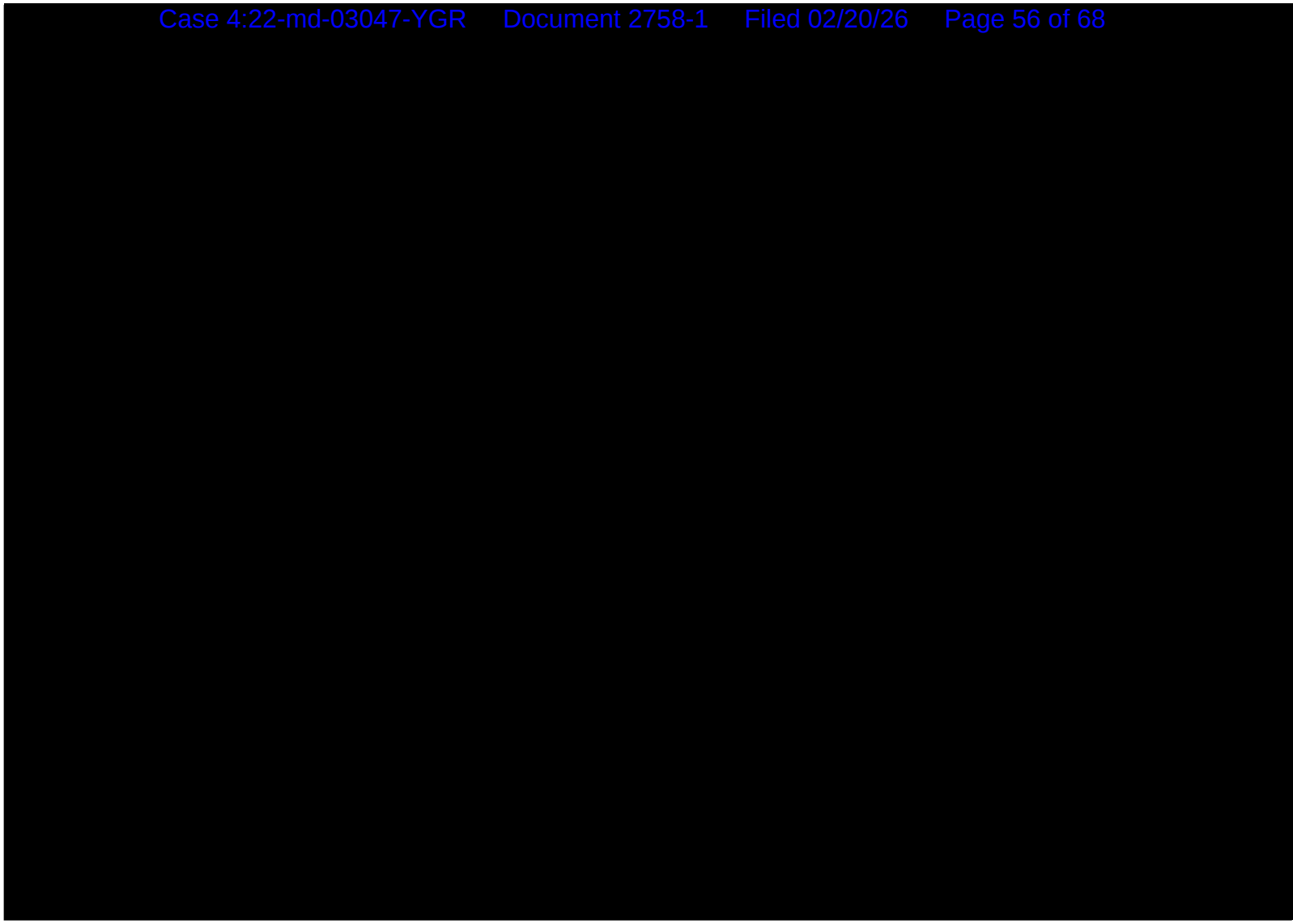
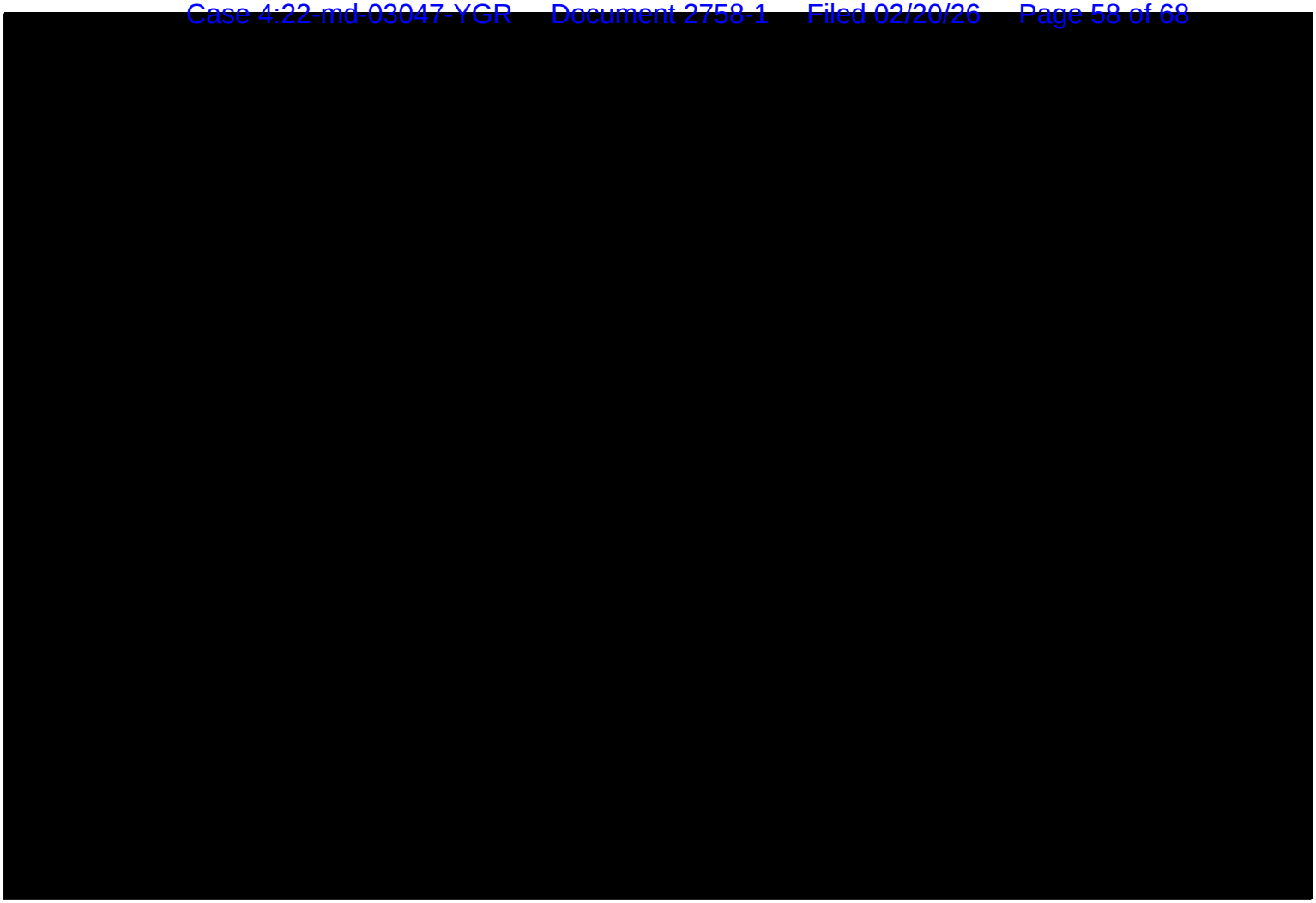
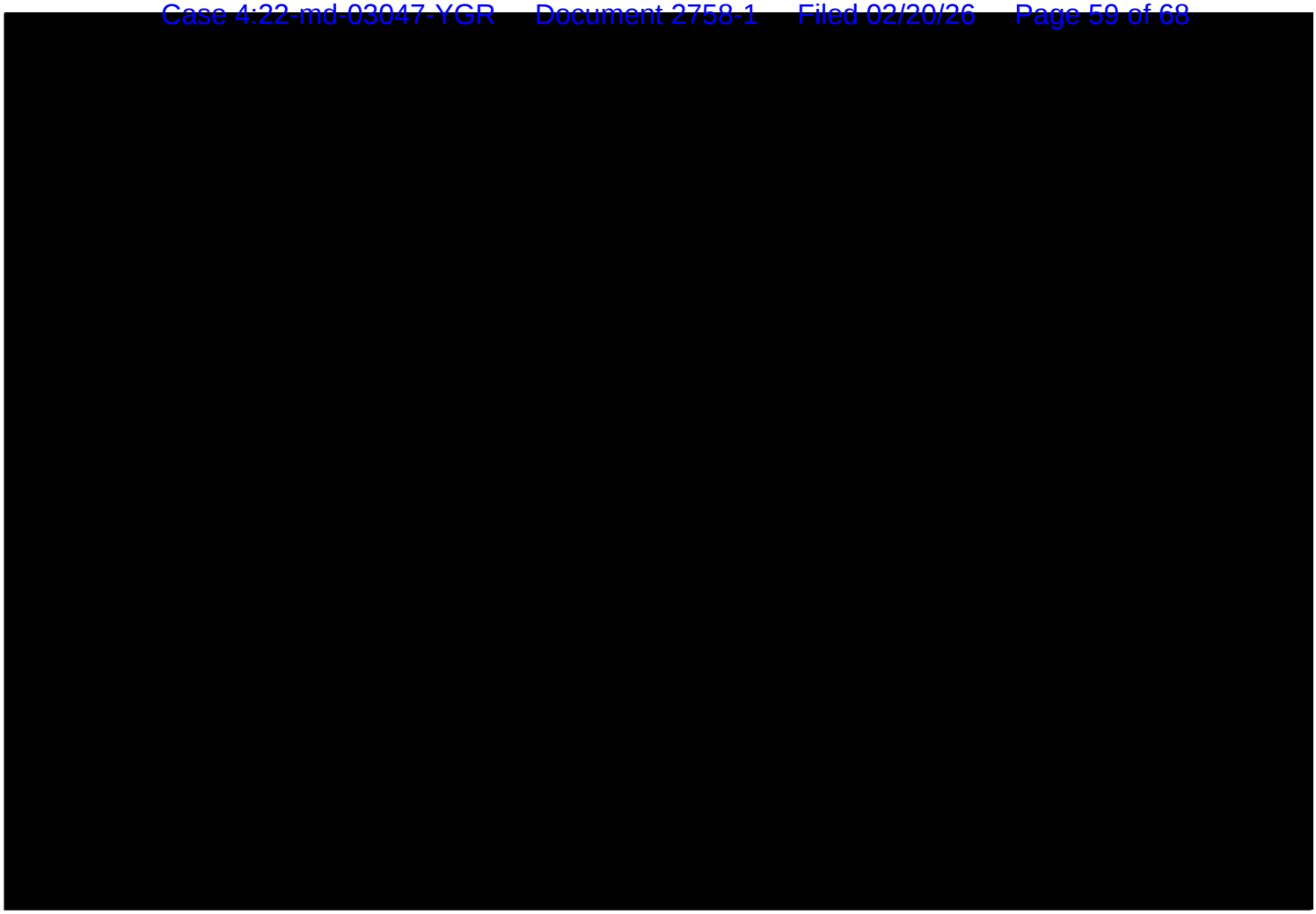
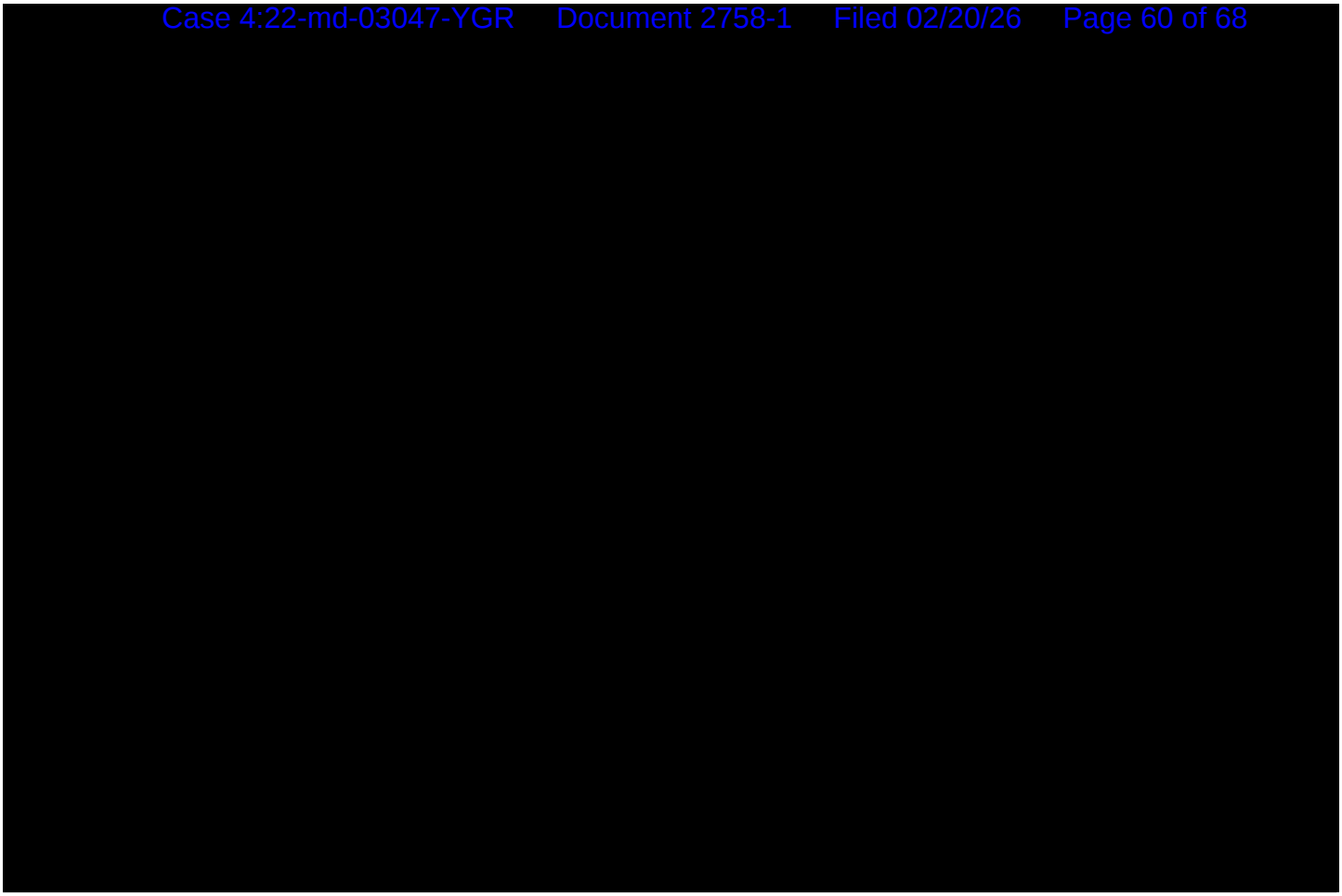
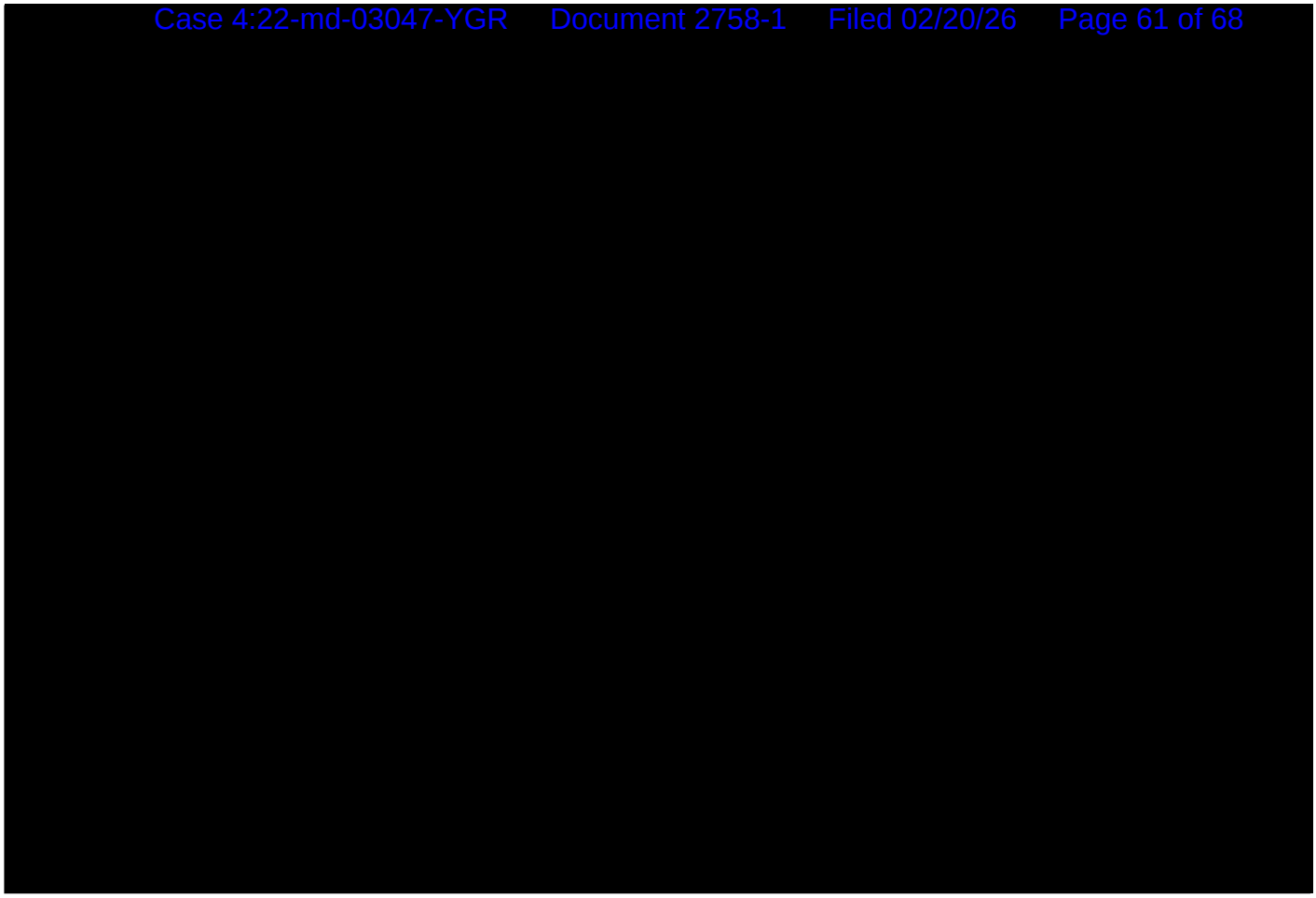
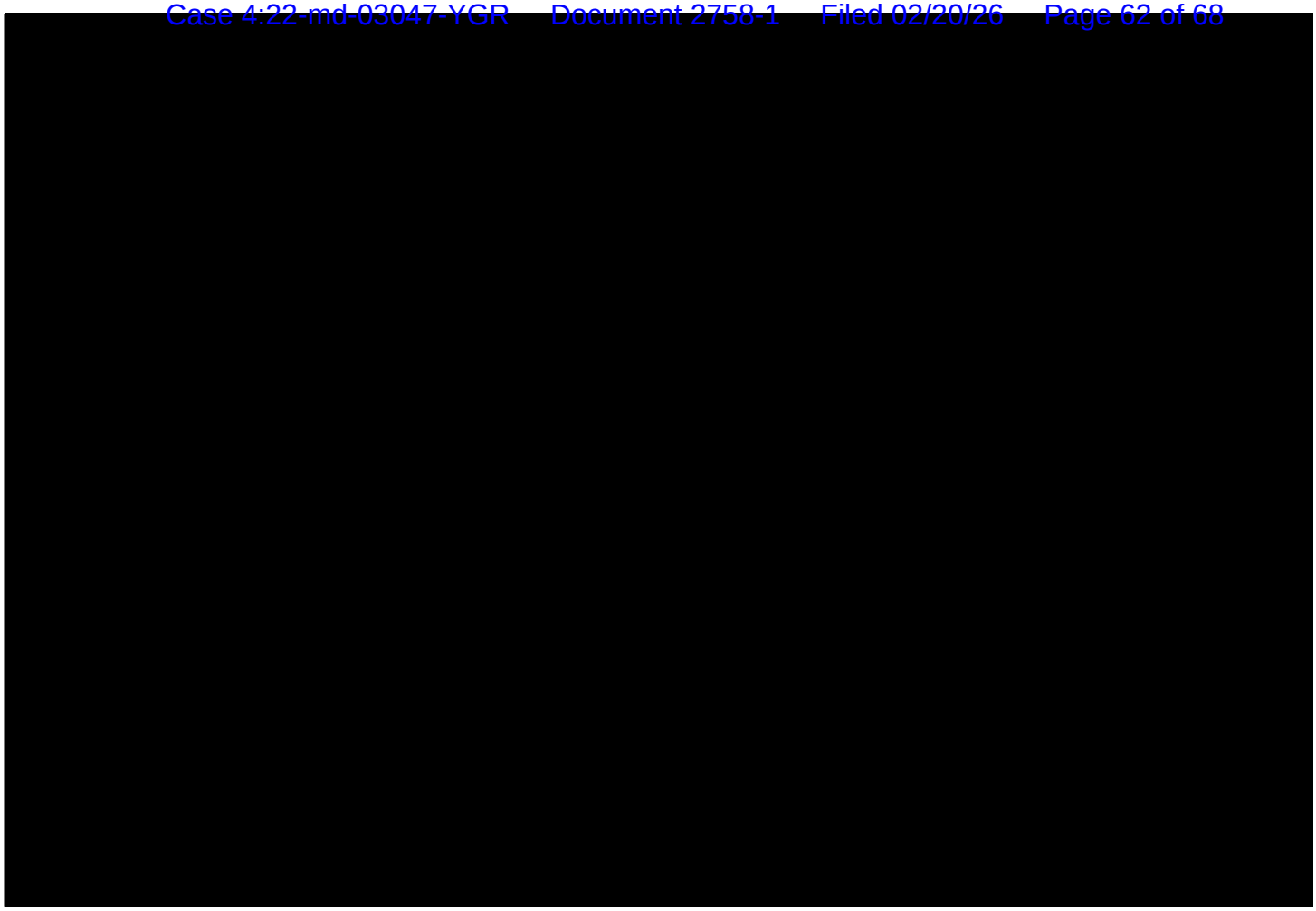
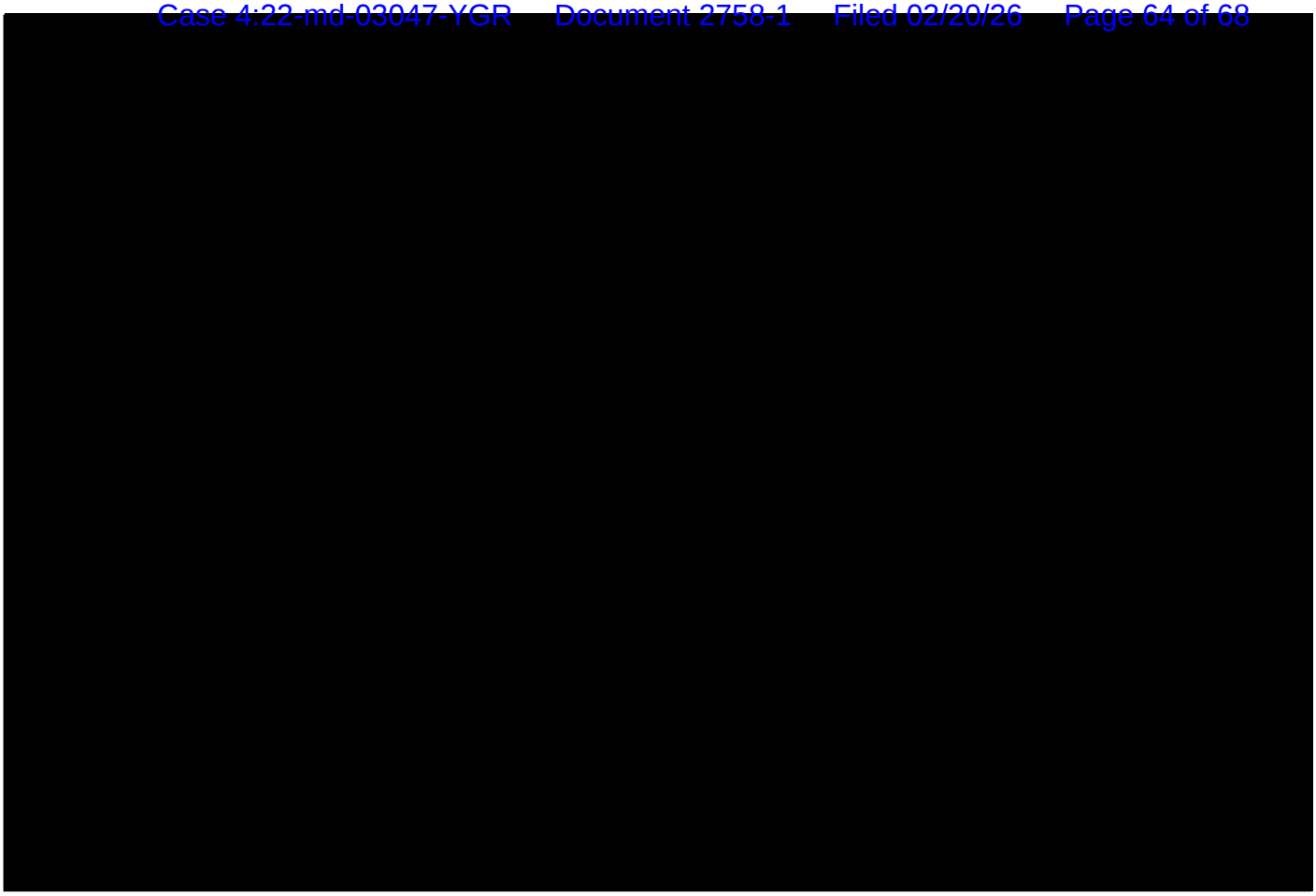
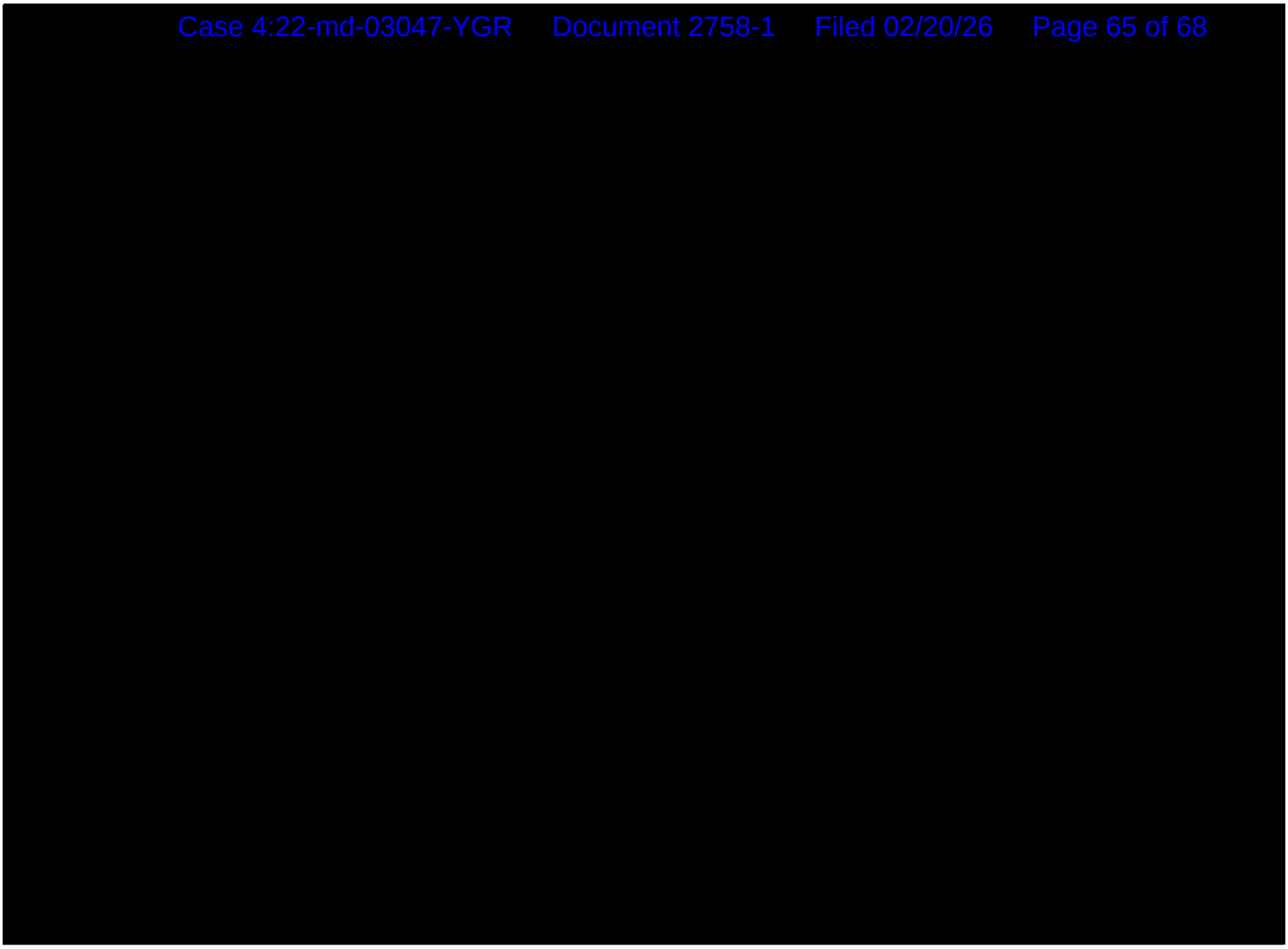
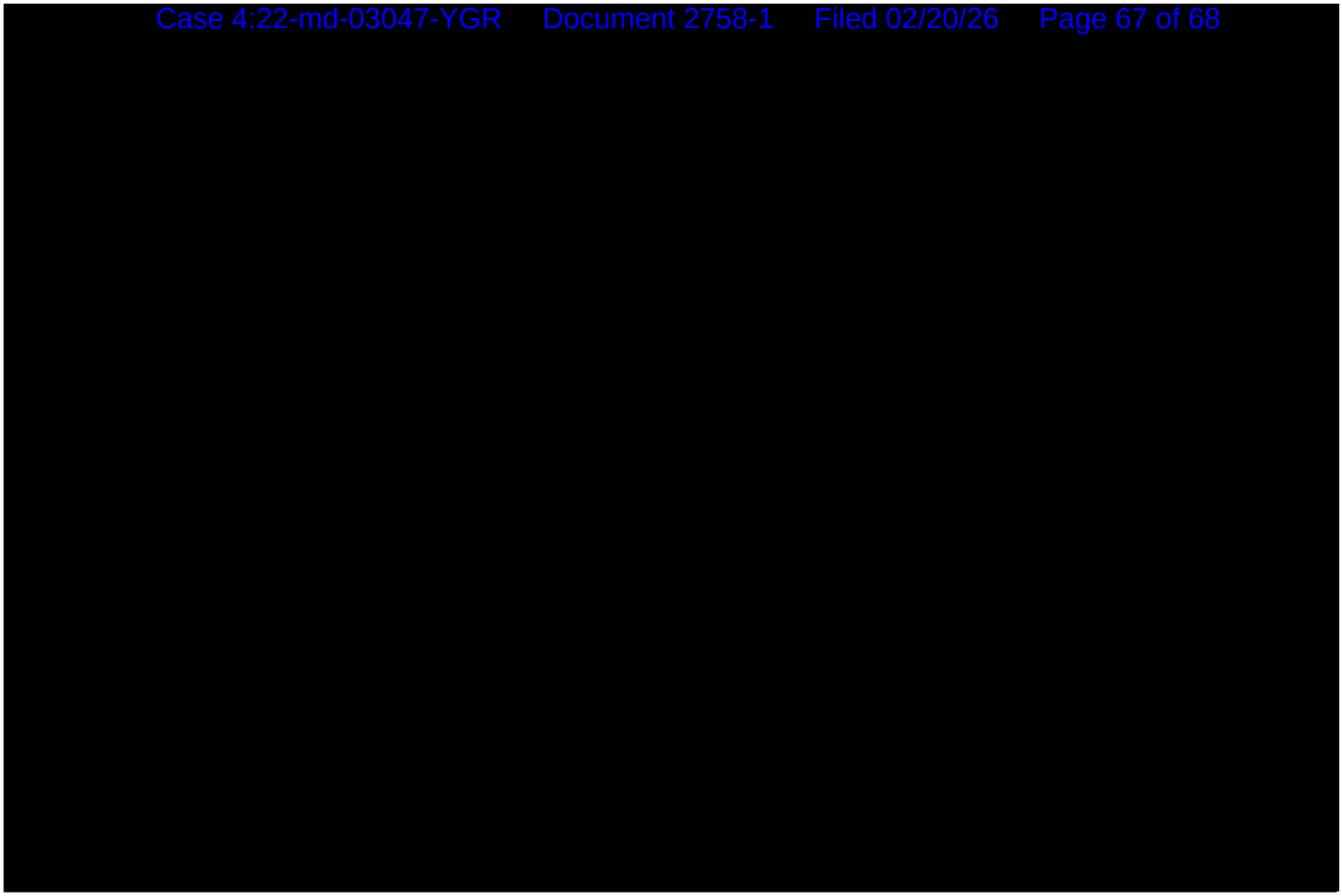
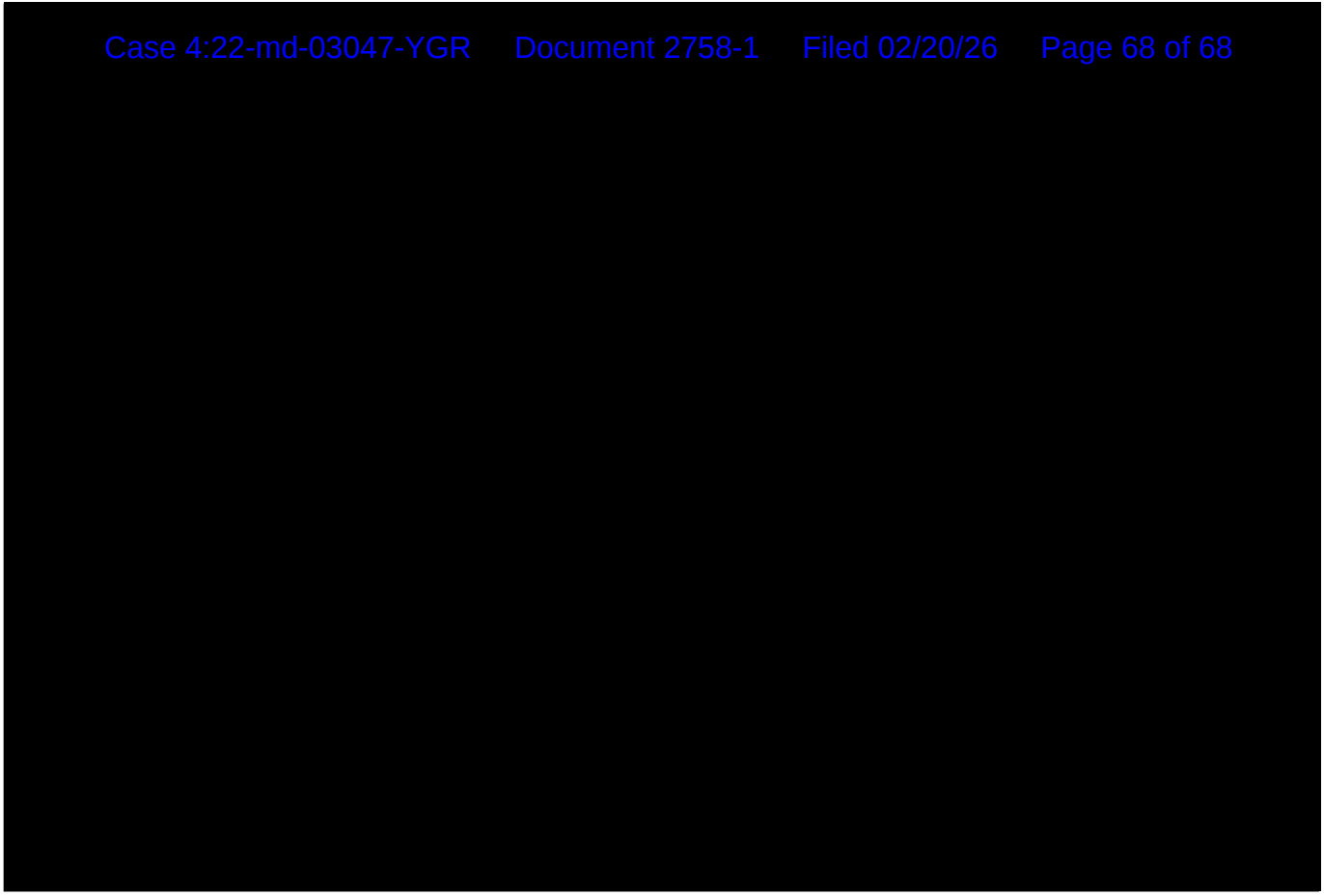
Well-being

External

Product Audit