

AMENDED Exhibit 38

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

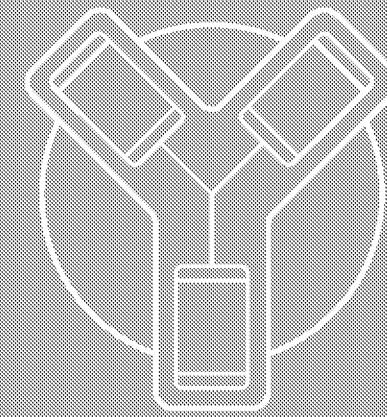
Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

HIGH SCHOOL COMMUNITIES

APRIL 23, 2018



Strategy review

- 1. High School communication is important to teens and important for us to win.**
- 2. The right people problem for us to focus on is class, club and community communication.**
- 3. The right way for us to solve this problem is in a new app.**
- 4. Facebook helps us solve the cold start and growth problems that would stymie other independent apps.**
- 5. When this independent app is successful, it will be valuable for Blue and Messenger.**

Strategy review

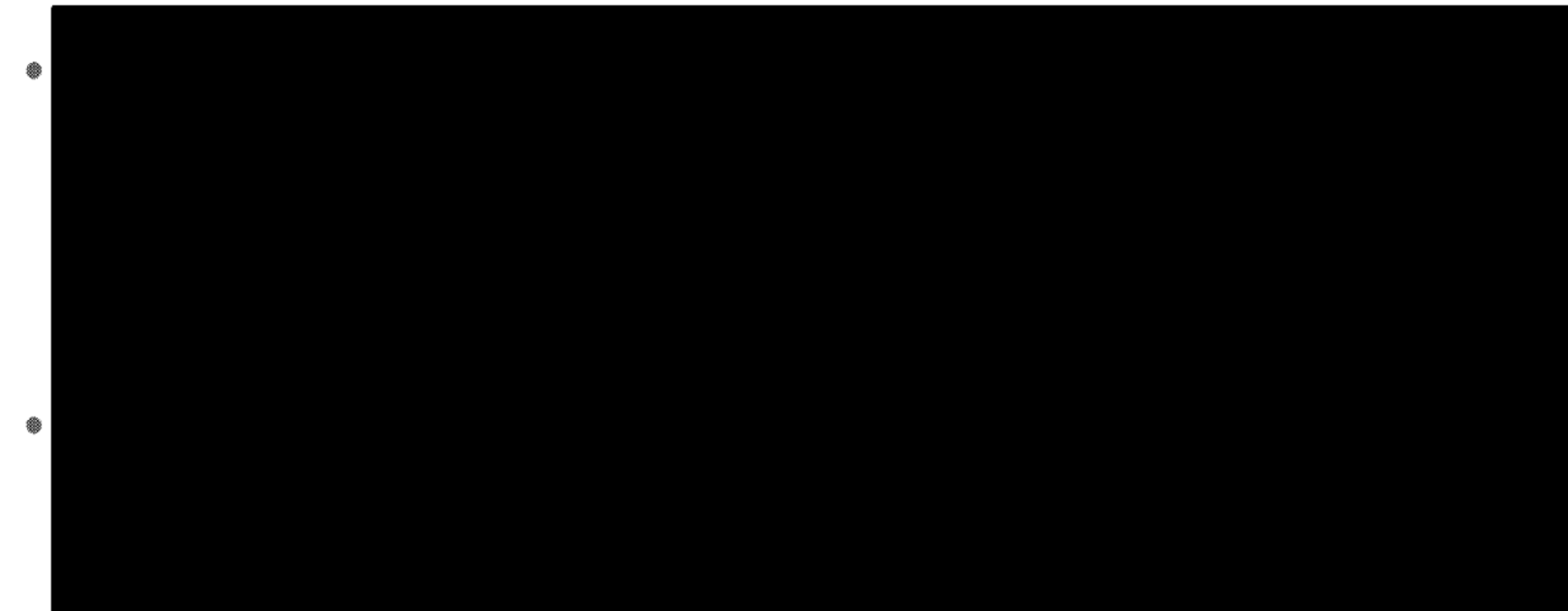
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Why does high school matter?

Almost all of an American¹ teen's most important "jobs to be done" happen at school.

- The typical American teen spends 35 hours per week in classes and an additional 5-15 hours per week doing homework while 57-76%² of US children participate in at least one extra-curricular activity..
- American teens meet their friends and romantic interests at school, get to know them through classes or clubs, and gradually become close outside of school.

Winning teens requires tipping local school networks.



1. This is true only of Western Teens. We will only focus on US Teens for this year, but we believe our learnings will be generalizable as teens meet and grow closer to friends in other real world communities (religious, neighborhood, sports team) in other markets

2. <https://www.census.gov/newsroom/press-releases/2014/cb14-224.html> | https://nlts2.sri.com/reports/2003_04-2/nlts2_report_2003_04-2_ch4.pdf

High school is a wedge into social

Teens meet and get to know new friends and crushes at school. So in building for school, we will mirror teens’ real world relationship development and have a shot at winning core social interactions.

			
	Meeting new people	Becoming Friends	Deepening a Relationship
At School	Meet people in classes or clubs at school.	Hang out repeatedly with your shared group.	Hang out 1:1.
Online	Discover people in your community and club groups.	Interact repeatedly in club, class or social groups.	Direct messaging.

Our opportunity

By End of 2018: Product Market Fit

- We have a retentive and engaging product that is used an average of 3x a week by 50%+ of a high school student body.
- In our qual research, people in this school love how it helps them feel part of the community. We hear about people starting to use and love it for communicating with clubs and classes.

By End of 2019: US Growth

- [REDACTED]
- [REDACTED]

By End of 2020: US Saturation and Global Testing

- [REDACTED]
- [REDACTED]
- [REDACTED]

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People problem

**I need one place to communicate with classmates
and see what my school community is talking about.**

- [REDACTED]
- [REDACTED]

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Product strategy

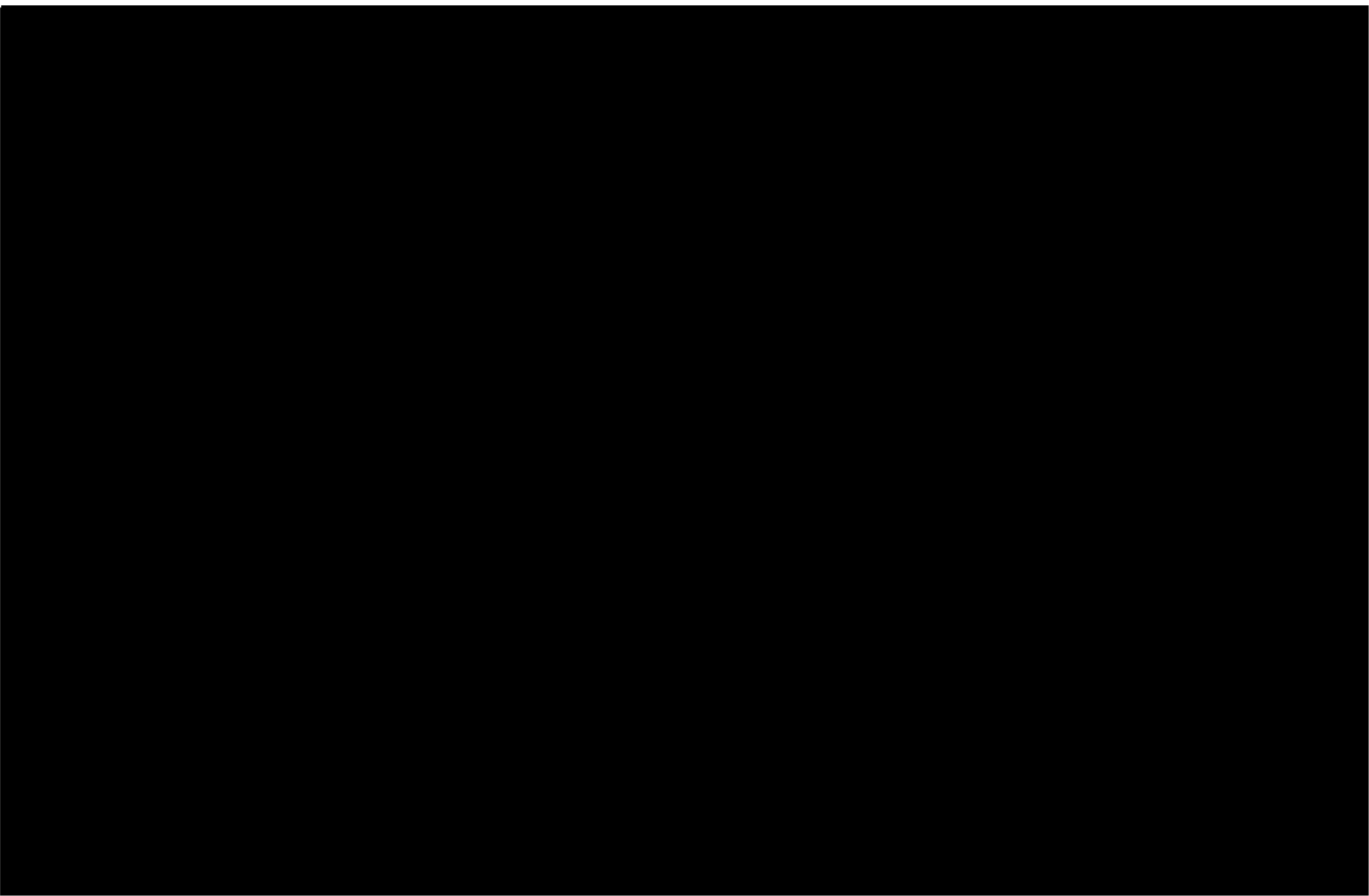
Our solution to this people problem will work if and only if:

1. Teens believe the audience of the app is only people at their high school.
2. Teens can quickly discover and join the right channels for their classes, clubs and communities.
3. Teens believe that recipients will quickly see the content that they send because:
 - The product is messaging first;
 - The product has reliable push
 - The product can send messages to classmates using other apps (Google Classroom, Remind);
4. Teens can interact with anyone who goes to their high school — not just “friends”.

Can we realize this strategy in Blue or Messenger?

Need	Blue	Messenger	New App
Audience is High School Only			✓
Messaging First		✓	✓
Push Reliability		~ ¹	✓
Integrations with School Apps			✓
Community (Rather than Friending) Graph	✓	~	✓
Joinable Channels		~	✓
Have the App Installed	✓	✓	
Existing Content on the App	✓	✓	~

1. [REDACTED]



People problem

**I need one place to communicate with classmates
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- [REDACTED]
- [REDACTED]

Competitive gaps

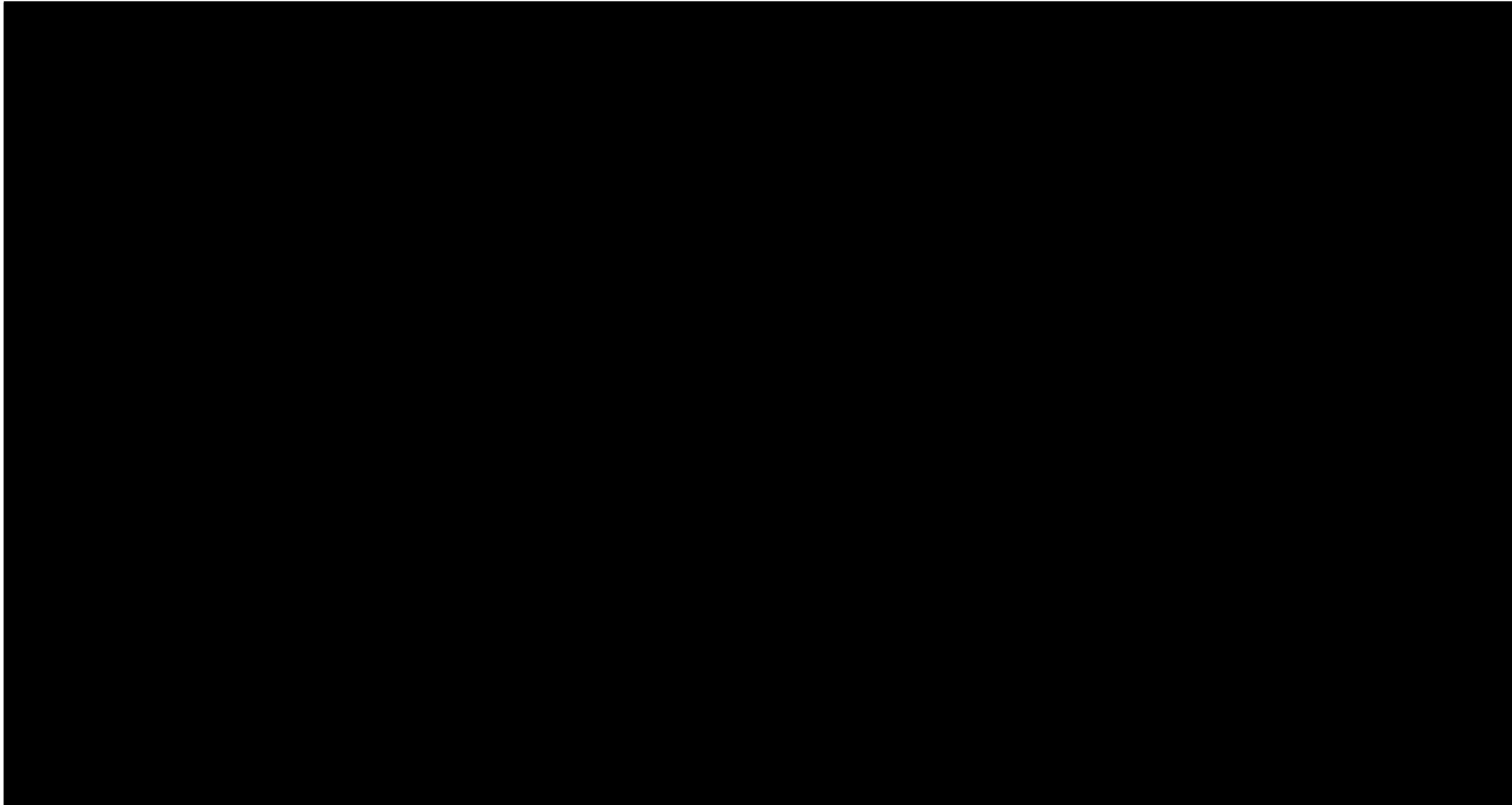
Problems with current solutions

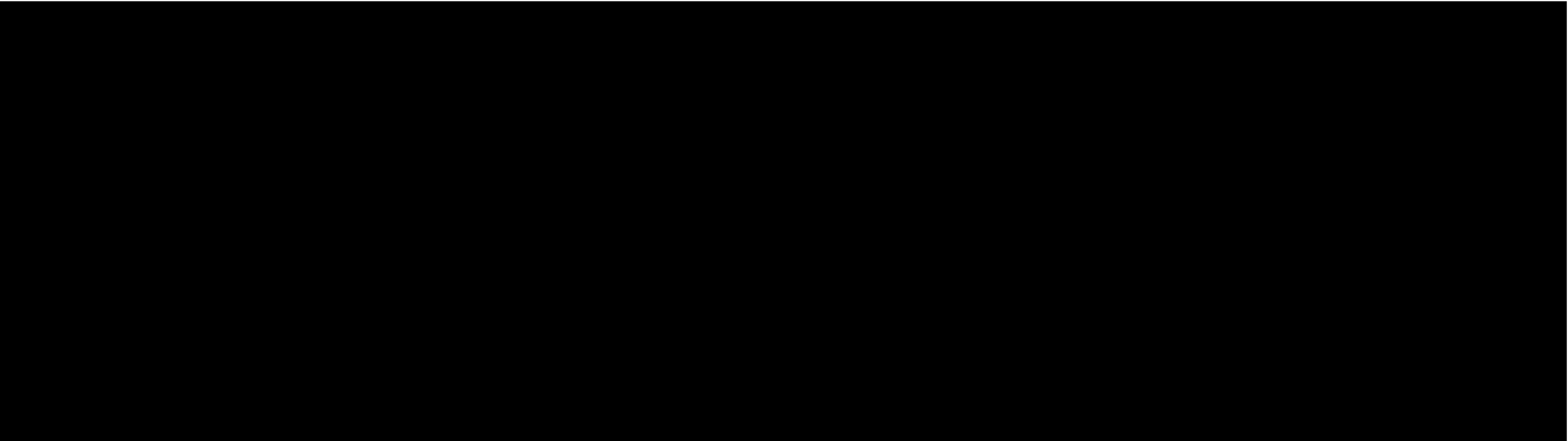
- **No Standard.** Different clubs, classes and community groups use different technologies for sharing about school.
- **Incomplete Graph.** People do not have phone numbers, emails or social media connections with everyone in a group so communication is confined to cliques within a team/club/class.
- **Noisiness.** Messaging and Snap are not optimized for recalling important content and students report being overwhelmed with low signal messages.

Barriers to Switching to a New Solution

- **No one else will use it.** Teens are afraid of associating themselves with an uncool product and that if no one else switches, they will feel rejected for using the uncool product.

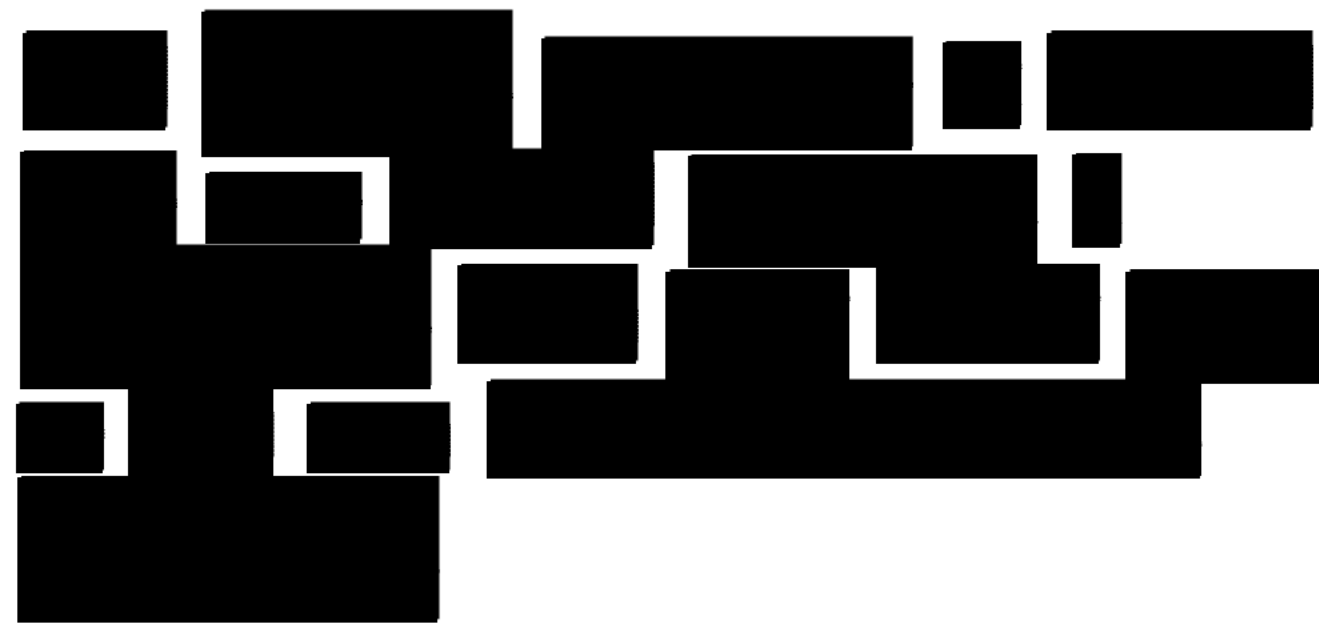
Design principles

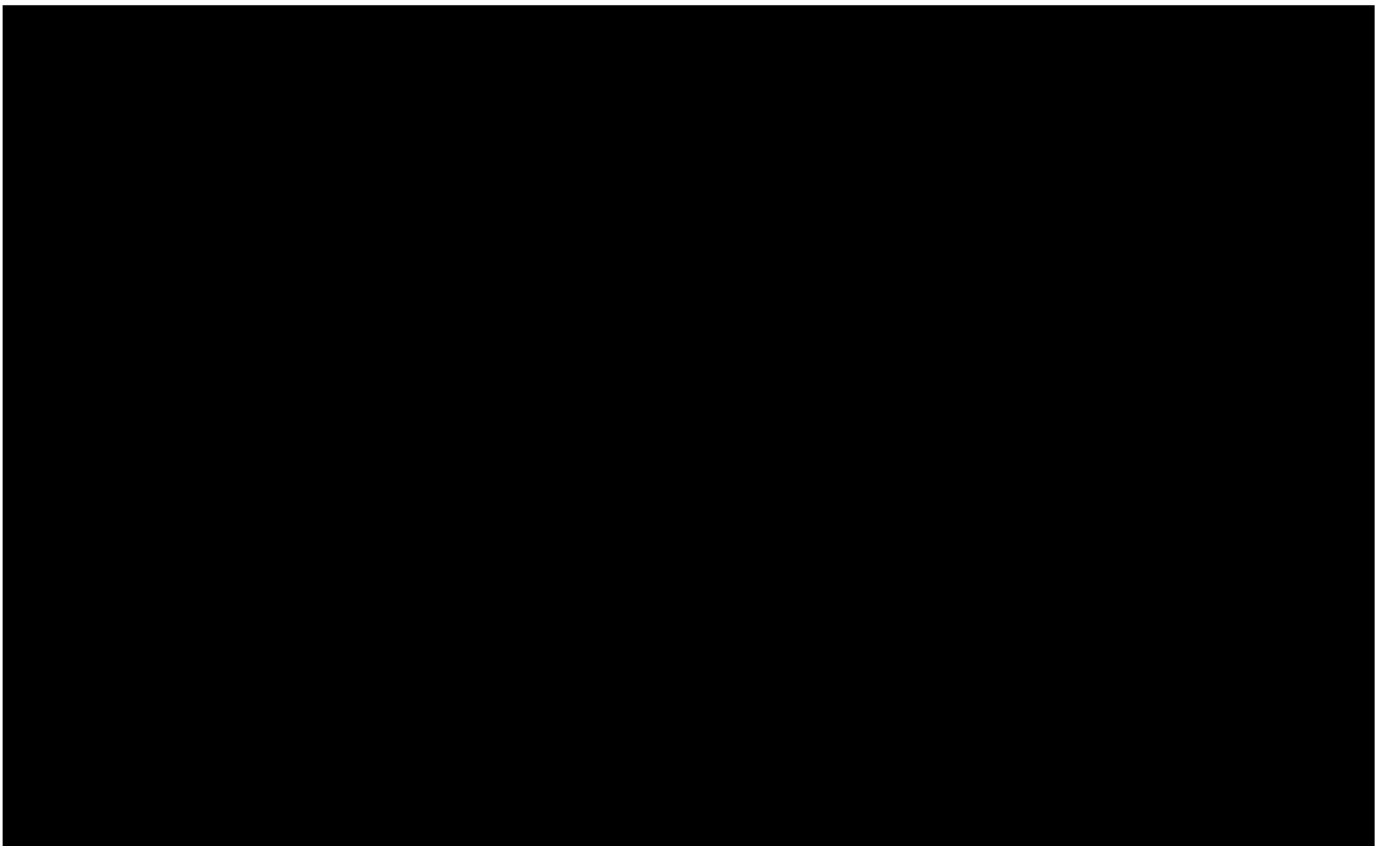
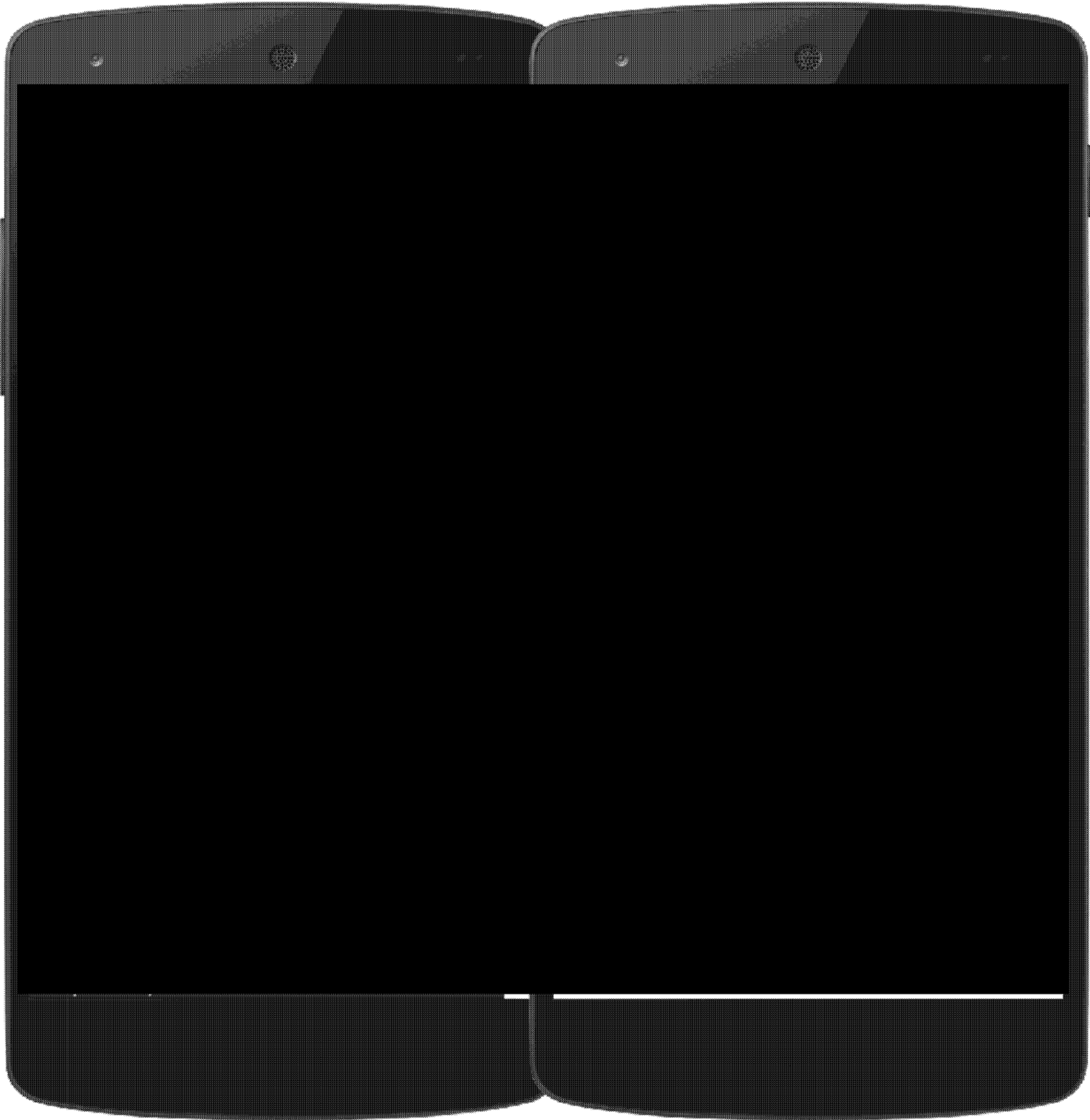


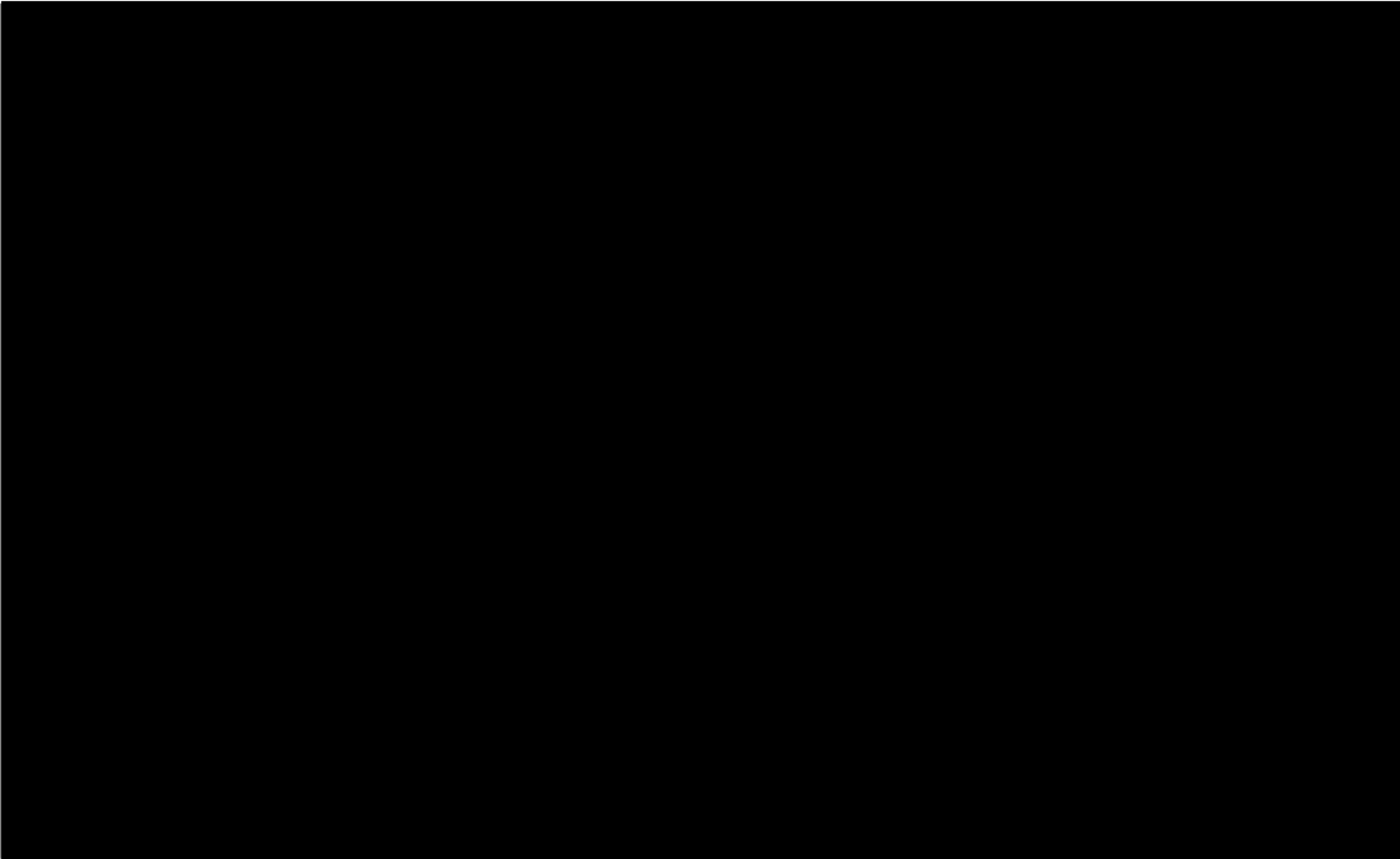




School communication is fragmented, with everyone using something different.

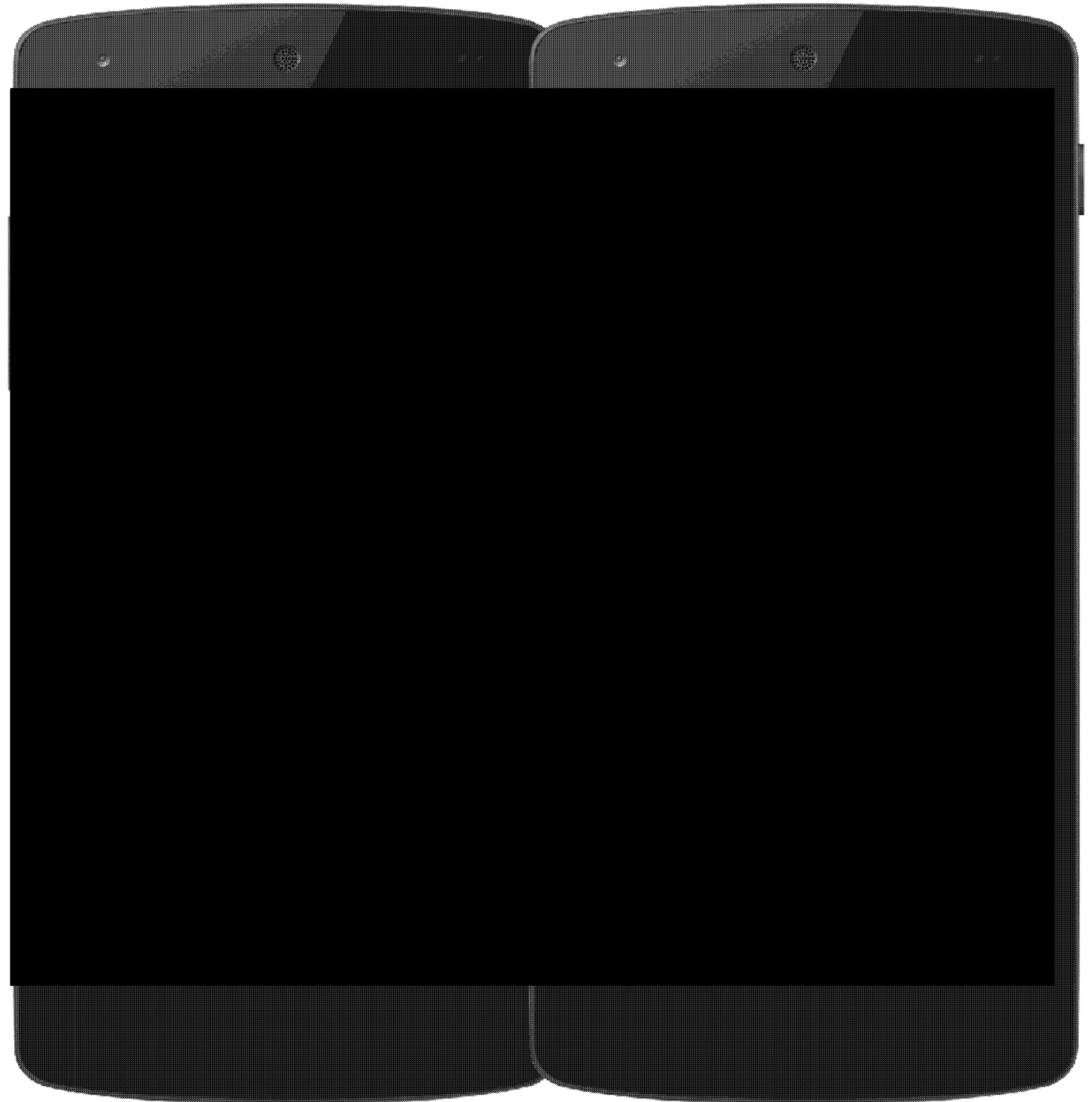






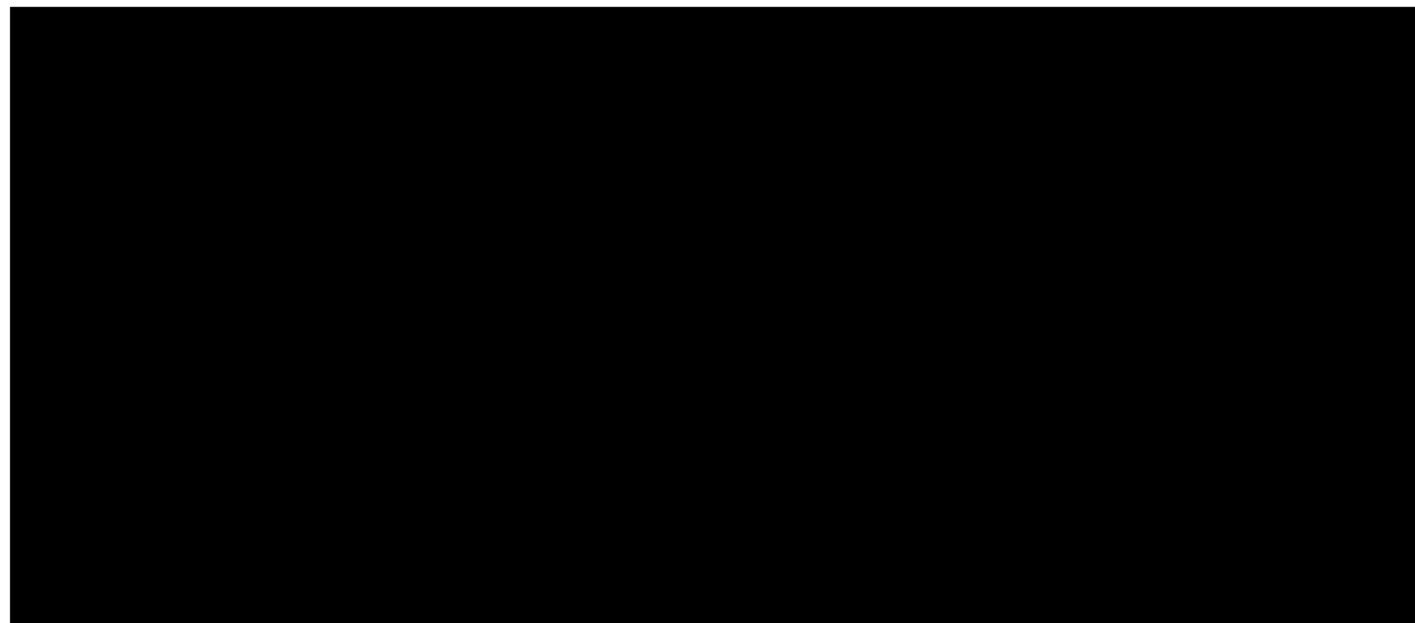


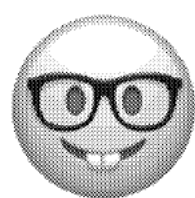
Keep things fun and social.



#Events

No more being the person who finds out about fun things after they happen.

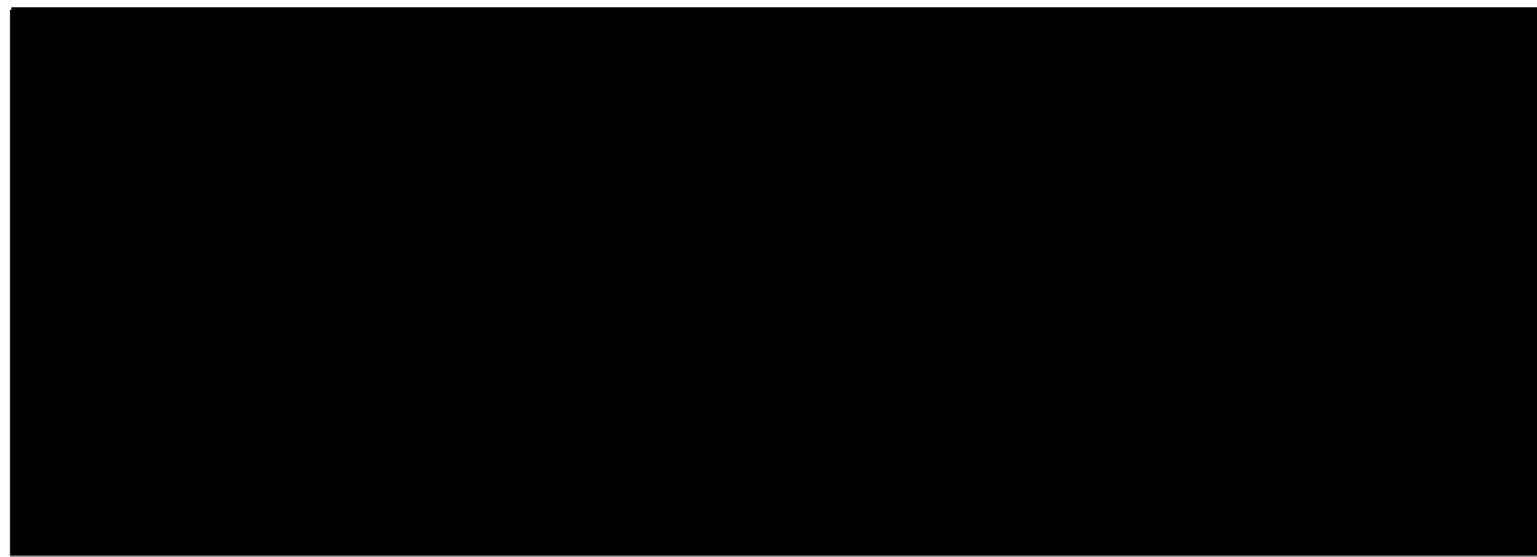




[REDACTED]

Focus mode

Group messaging today is noisy
and distracting.



What teens had to say

“I’m looking forward to having the whole high school experience, you know, both the school stuff and a social life.”

[REDACTED]

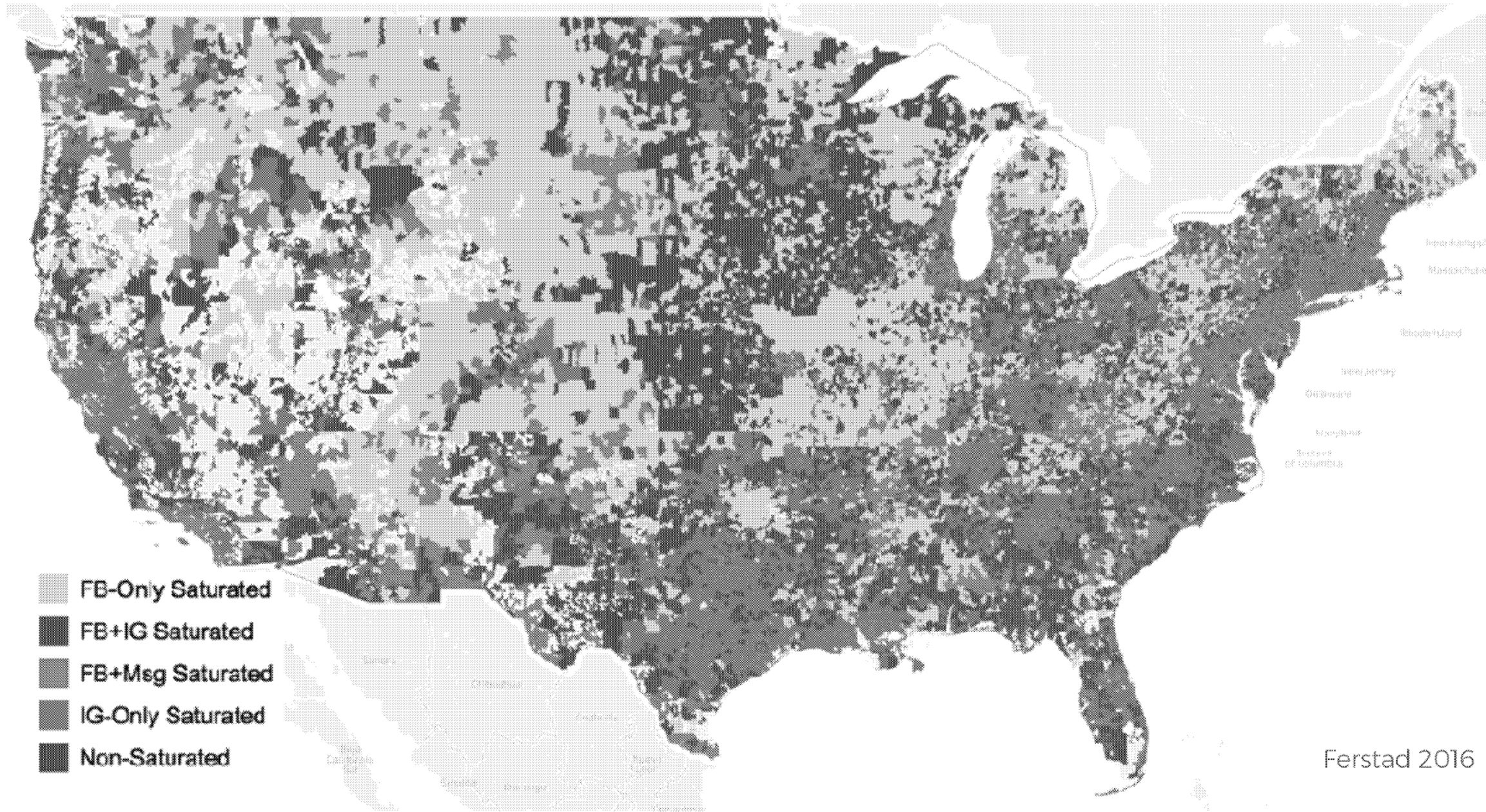
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Traction and growth

97% of US teens live in an area saturated by Facebook or Instagram.



- We will attract initial users to download [REDACTED] by using ads and QPs across both platforms.
- We will solve cold start in [REDACTED] channels by importing school content from both platforms.
- We will drive growth by building integrations that enable the sharing of content and sending of messages from [REDACTED] to Facebook, Messenger and Instagram.

Facebook's Community Integrity teams will be essential to our success

Facebook can keep out bad actors.

- Teens tell us that other high school social spaces become unsafe as adults, scammers and predators invade the space.
- Facebook's real identity, coupled with our age affinity, location and friend graph allow us to have a high degree of confidence when students go to a school.

Facebook CI can police bad content.

- Teens also warn us that student-only spaces become rife with bullying and drama causing other students to flee.
- We have the know-how and resources to enforce high community standards to keep the space feeling safe and positive.



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The Opportunity for [REDACTED]

By End of 2019: US Growth

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- [REDACTED]

By End of 2020: US Saturation and Global Testing

- [REDACTED]
- [REDACTED]
- [REDACTED]

The Opportunity for Facebook

As [REDACTED] grows, it will be a valuable on-ramp to Blue and Messenger.

Account growth

[REDACTED] will require a Facebook account, and enable teens to create accounts directly in the app.

Data sharing

[REDACTED] interaction data can be used to power Facebook ranking like PYMK, Coefficient, Feed Rankings and Groups You Should Join.

[REDACTED]

Appendix

