

## **AMENDED Exhibit 46**

# **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

# Youth Data & Research

[REDACTED] on November 13, 2016 at 11:33 PM

## TL;DR: \* \*\*Instagram and Facebook are geographically complementary for US teens. Instagram is strong in many areas where FB is weak, and vice versa.\*\* \* 97% of US teens live in an area that is saturated by either FB or IG (27+ min avg. daily teen TS/WAP, which is a good predictor of high teen adoption within an area). Only 29% of US teens live in an area that is saturated by both FB and IG. \* \*\*Instagram is doing better than FB with US teens overall.\*\* \* About 80% of teens live in IG-saturated areas, while only 46% live in FB-saturated areas. \* \*\*Instagram is doing better than Facebook with teens living in richer, more educated areas with higher iPhone adoption such as the coastal metros of the Bay Area, LA and NYC.\*\* \* Facebook and Messenger are particularly strong in poorer, less educated areas with high teen adoption of old android devices. \* \*\*Messenger and Instagram are also successful in different areas.\*\* \* Only 15% of US teens live in areas saturated by both IG and Messenger, while 26% of US teens live in Messenger-saturated areas and 80% live in IG-saturated areas. \* \*\*Instagram is our leading teen product and can probably funnel teens and tip local networks to Facebook and Messenger saturation.\*\* \* We need a new value proposition for Facebook (e.g. social entertainment) and entry points inside Instagram to bring some of these teens back to FB Blue. Similar entry points could help Messenger adoption. \* We should leverage the Instagram graph to bootstrap close teen-to-teen connections on FB and Messenger in areas with low FB adoption. This can be a powerful growth lever to tip local networks and strengthen FB engagement. \* \*\*We should figure out whether pushing Facebook, Messenger and Instagram together to teens in the same areas is a good idea.\*\* \* Building separate high school and/or messaging features inside Instagram might be more a more effective strategy to engage teens in Instagram-saturated areas. \* We can track and experiment on a local network level to figure out if pushing features within Instagram is more effective than funneling teens from IG to FB/Messenger. \* \*\*Engaging the vast majority of teens in an area / school with our products is crucial to driving overall time spent in the same area, especially for Messaging features.\*\* #markdown

[REDACTED] on November 13, 2016 at 11:37 PM

CC [REDACTED] [REDACTED] [REDACTED]