

AMENDED Exhibit 68

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: 2018 Instagram Ambassador Program

Program Objectives

The ambassador program will aim to:

- Recruit and onboard teen tastemakers to act as our plug at local high schools within 5 key markets
- Drive product adoption through word of mouth for upcoming launch initiatives
 - Create physical + digital challenges for ambassadors that engage peers and build buzz
- Whitelist ambassadors for approaching launches
 - Ambassadors will act as our early adopters and help increase visibility
- Build rapport and strengthen relationships with community members

Finding Ambassadors in Key Markets

- Target several cities from US City Target List for H1 2018
 - New York
 - Los Angeles
 - San Francisco Bay Area
 - Columbus
- The ideal ambassador profile:
 - 13-17 years old
 - Diverse
 - Well-connected to peers, heavily involved and well-known within their school

Quick Promotion (QP)



Using QP to target influential TEEN community members

- Work with [REDACTED] to create lists of community members to target
- Identify content strategists to support QP creation process
- Launch test QP to gauge interest
- Create custom gate targeting a wider audience, relaunch QP
- QP will direct to a form, where ambassadors need to confirm that they are over the age of 13.
- QP - Ambassador Program Copy

Selection Process, Invitation Email

- DRI to filter through applications and send invitation emails to teens who are a good fit for the program
- Ambassador Program Email (will slightly modify for new ambassadors)

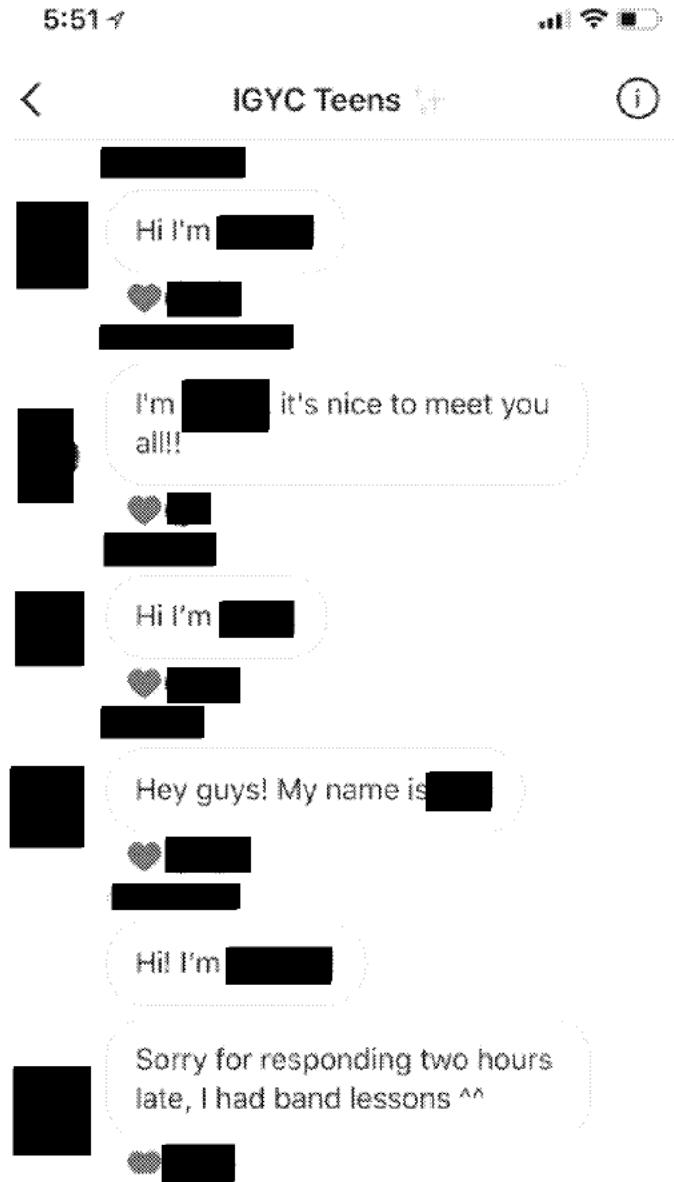
Sending NDA's + Getting parent permission

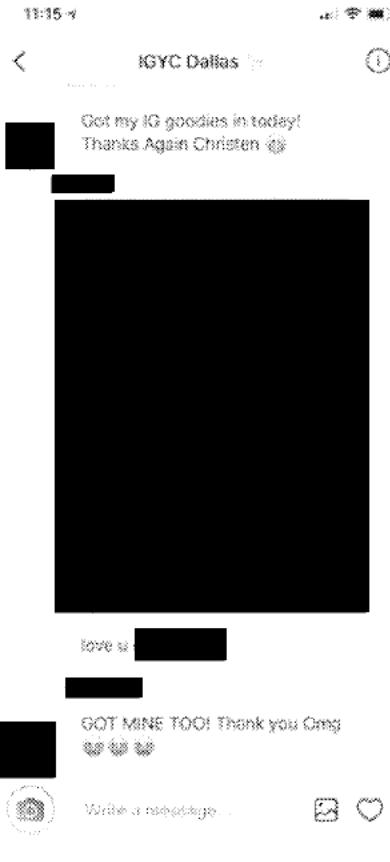
- After teens respond to the ambassador invite email, we need to send a consent form and NDA
- Sample consent form available [here](#)
 - Will need to have Policy review
- [Ambassador Consent Form](#)
- [NDA](#)

Creating and Managing the Groups

DM Groups

- DRI to create DM groups according to age or location. Current DM group structure looks like this:
 - Once the DM group is created, it is important to have DRI have ambassadors introduce themselves and encourage ambassadors to follow each other.
- Send custom Instagram swag boxes to new ambassadors after NDAs are signed





Keeping Ambassadors Engaged in DM

What to communicate each month in the DM group

DRI to make casual conversation a few times a week.

Examples: Did you see this meme going around Instagram? Do you like this account? Would you use a face filter like this? Did you do anything fun this weekend?

Ask ambassadors to share any interesting/funny content

It's important to make conversation and ask them about things not related to Instagram

Send challenges as new product features launch

Creating Challenges that spread WOM

Create fun, unique challenges around upcoming product launches & enhancements

Focus on big bet product launches (Direct, Video Chat, IG Creator App) but support small rollouts and other updates as needed

Brainstorm challenge ideas with PMM leads and build into marketing launch plan

Challenges can be both digital/physical depending on momentum needed at launch

We should aim to never force ambassadors to publish anything that feels like branded content

Digital Challenge Example:

Big bet digital: When VC launches, challenge ambassadors to VC with 2 groups of friends within 24 hours of launch and screenshot their VC session to their story

When sending swag or items for physical challenges, aim to have all materials IG creative approved. The goal aimed at ambassadors showcasing their merch through an "unboxing" experience on their story/feed. **Physical Challenge Examples:**

Big bet physical: When VC launches, produce & assemble kits (<http://www.creativesolutions.net/>) ambassadors to distribute at school to their BFFs to spread WOM

Establishing ambassador accountability

- Our strategy is to be transparent about expectations when reaching out to community members, but also remain flexible as school obligations (homework, sports, etc) should take precedence
- Make sure Instagram DRI is consistently active through DM, keeping ambassadors engaged and excited about being an ambassador
- Ambassadors will have 5 ways they can participate in the program each month, we will call these “Challenges”, if they complete 3 out of the 5 they get an Amazon Gift Card
 - No more than 2 out of 5 challenges a month should be digital-focused
- Offer monthly incentives to keep ambassadors motivated
 - Implement an ambassador of the month program
 - If ambassadors complete 5/5 challenges they are eligible to be Ambassador of the Month
 - This still allows ambassadors the freedom to be as involved as they would like to be and opt into each task individually
 - DRI to announce Ambassador of the month in groups each month
- Create an exciting incentive program



Monthly Incentives:

Ambassador of the month award (designed with help from creative) which is a physical certificate mailed with a small piece of IG swag (like Backpack, Sweatshirt, Sweatpants, etc.) awarded to one ambassador per DM group

EOY Examples

Ambassador of the year award (plaque)

Inviting top ambassadors to exclusive experiences like VidCon, InstaSkate, participate in celebrity visits, etc.

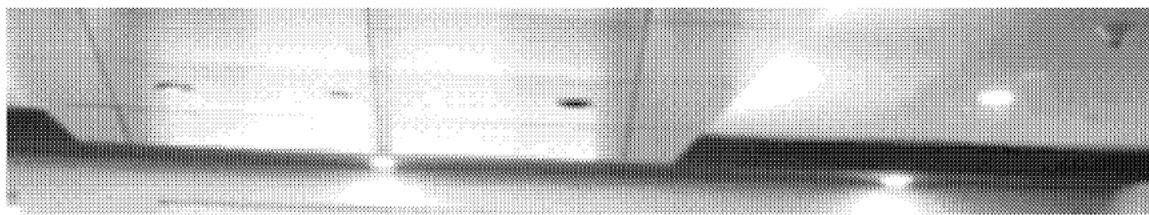
Paid visit to HQ or NY office in Summer 2018

Wishlist items

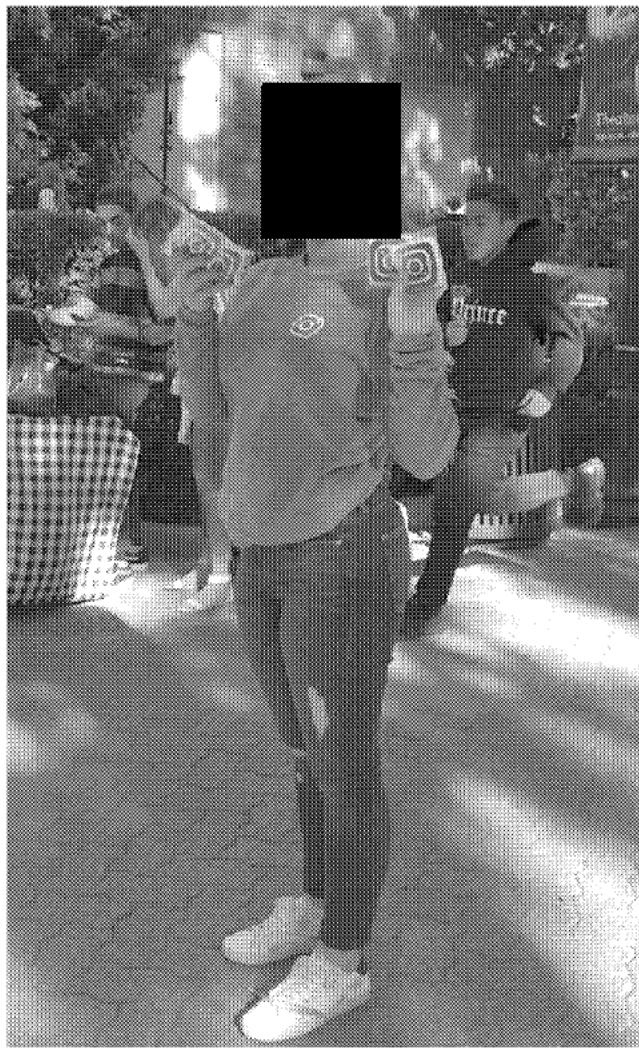
Badge on profile (similar to verified- but different symbol)

@instagram to follow our ambassadors or like their various “challenge” posts

Whitelisting Ambassadors







- Work with PMM team to identify appropriate testing opportunities for 3-5 new features per year
- Identify trustworthy ambassadors to beta test new product features
 - Work with ambassadors to build buzz and provide valuable feedback to our team

Compensation

- We can pay US ambassadors up to \$599 a year (due to tax reasons)
- The Ambassador Program will pay teens \$45 a month via Amazon Gift Card if they complete 3/5 challenges each month
- Amazon.com/gc/corp/order

Ambassador Sample Calendar (from ambassador POV)

Swag

Welcome to the program Swag box

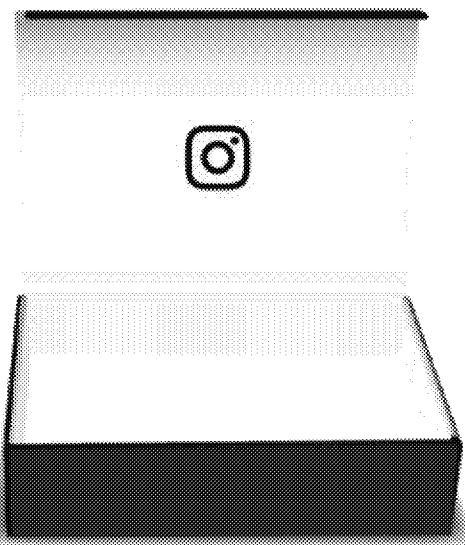
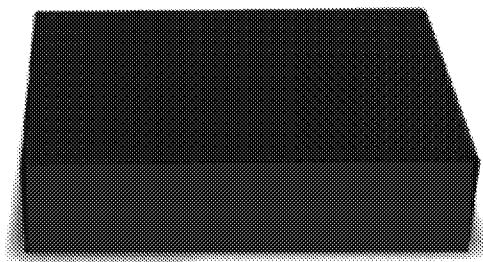
Vendor: [Creative Solutions](#)

Price: \$14,073 for 200 boxes

\$70.00 per ambassador

Ambassador Welcome Kit:

- Hat
- PopSocket
- Lanyard
- Drawstring Bag
- Sticker Sheet
- iWallet





ambassador of the month swag

Vendor: [Creative Solutions](#)
Price: \$4534.56 for 46 boxes
\$98.00 per ambassador

Ambassador of the Month Box:

- Award
- Laptop Sleeve
- Bluetooth Speaker

Ambassador of the Month



back to school swag

Vendor: [Creative Solutions](#)
Price: \$TBD for 90 boxes

\$TBD per ambassador

Back to School Kit:

- Highlighters
- Notebook
- Button set
- Postcard

Back to School



Halloween

Halloween Candy



Winter Kit

[Contact Support](#)

Conversation History

Quipbot#11 left the thread *Sep 18 at 4:31 am*

Quipbot#11 *Sep 18 at 4:25 am*

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