

AMENDED Exhibit 69

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 Directory - Product Messaging & Launch Doc. [working draft]

6-School Pilot Program: Thursday, May 10

- Bay Area Private Schools including:
 - Valley Christian High School
 - Notre Dame San Jose
 - Presentation High School
 - Bellarmine College Prep
 - St. Ignatius College Preparatory
 - The Urban School

Expanded Pilot Program: Late July

US Launch: August/September

- No eminent plans to launch to ROW

What's Launching

A new space to add your high school to your profile, only available to high schoolers in the US. This space will lead to a directory of students your high school that allows you to easily message people in Direct.

Note: at the test, only people that are also certified to be in your high school will be able to see if you've added your high school to your profile.

Goals

- Product:
 - US Teen DAP
 - % of teens who join the directory
- Adoption:
 - Adoption among US Teens (13-18)
- Sentiment:
 - Instagram is a place to connect with people in my network

Team

- PM: [REDACTED]
- Design: [REDACTED]
- Data: [REDACTED]
- Content Strategy: [REDACTED]
- Research: [REDACTED]
- PMM: [REDACTED]
- Comms: [REDACTED]
- Teen Community: [REDACTED]
- Editorial: [REDACTED]
- Brand: [REDACTED]
- Policy: Karina Newton

Key Docs.

Run of Show: TK

Creative Brief: TK

Latest Mocks: <https://our.intern.facebook.com/intern/px/project/396618630782555>

Reactive Comms: Reactive Comms; High School Directory [WIP]

How It Works

Product Overview

How it works:

To join your high school network:

- At the test, if you have already added your high school to your profile and you attend one of the pilot schools, you will receive an in-app prompt telling you to join your new high school network.
- Click to begin the registration process. To join, you must have a valid school email address.
 - You will be prompted to submit your school email in order to certify that you attend your high school.
 - Check your email inbox to verify your school. If you can't find it in your inbox, check your spam folder.
 - Once you click to verify, you will be returned to Instagram to join your high school network.
- Once you've verified your school, you will be prompted to choose a grade.
- Here, you will also have the opportunity to invite friends to join your network.
- Once you have selected your grade, you will be added to the directory. You can now view everyone in your high school who has joined and message them on Direct.

If you are invited to join your high school network:

- *Note:* At the test, if you do not have your high school in your bio, you will only be able to join your high school network if someone certified from your school has invited you.
- You will receive a notification that your friend has invited you to join the network.
- Click on the notification to join your high school network. You will then follow the same registration flow described above.

To view the directory and message classmates:

- Click on your high school link in your profile to view the school directory.
- The directory is separated by grade. Click on different grades to view classmates from different class years.
- To message someone, click on the messaging button next to the person's name. You will be brought to a Direct message.

To report someone who does not go to your high school:

- Click on the three dots next to their name in the directory.
- You will be prompted to report that someone is not a current student.
- If the student has been reported three times, they will be manually reviewed.

To report someone who messaged you that you don't want to message you in the future:

- You have three options in this case. You can hide them from your inbox, block them or report them.
- To choose any of these, press the "i" tab on the top right of the message. You will then be prompted to "Hide from Inbox," "Block" and "Report."
- If you hide them from your inbox, they will not appear in your normal Direct inbox. Instead, their message will go into the "Message Requests" tab.
- If you block them, you will block them from sending you messages. This works like normal blocking in direct.
- If you report them, they will be reported to our servers. The experience will work the same as described in "To report someone" above.

FAQ

Q: Who can:

- See your high school in your bio?
 - At the test, only certified people who attend your same high school can view your school.
- Message you?
 - Anyone who is certified to go to your high school can message you using the directory.
 - If you don't want them to message you, you have to block them.
- View your high school directory?
 - Only certified people who attend your same high school can view the directory.
- See your name and grade in your high school directory?
 - The same as above — only certified people who attend your same high school can view the directory.

Q: Can anyone who goes to my high school message me?

- Yes. If you don't want someone to be able to message you, you will need to block them.

Q: I already added my high school to my profile. Will it show up twice?

- People who are in your high school will see it twice.
- People who are not in your high school will not be able to see the clickable link to your high school. If you have added your HS to your bio, you will need to remove it if you don't want it to show up twice.

Q: What if someone gets in a high school network that shouldn't be there?

- We have comprehensive reporting tools for this occasion. To see them, visit: <https://our.intern.facebook.com/intern/px/p/d3r/>
- One of the options is to select "not a current student."
 - If we determine the person is under 30, we wait for 3 separate reports to bring them to manual review.
 - If the person is over 30, we automatically remove them.

Q: Can you report someone who doesn't belong in your high school network?

- Yes, reporting can be done easily and directly from within the high school directory.

Q: What are we doing to mitigate for issues like bullying in high schools? Doesn't creating an internal network make those issues worse?

- We want to maintain a safe and supportive environment on Instagram, which is why we have no tolerance for bullying or harassment on the platform and give you the ability to take appropriate action if you're being bullied. In addition to our robust reporting infrastructure, comment and bullying filters, we are also taking extra precautions to ensure bullying is not taking place within high school directories. We will manually review anyone who is reported multiple times.

Callouts and KPs:

- You have to choose a grade to join, but we don't proactively certify that it's the correct one.
- People may change their names or create fake accounts, and we are proactively monitoring this.
- We know that the certification flow is high-friction, but at the test we want it to be as secure as possible. We are exploring ways to make the experience more seamless, while preserving our high bar for safety, at launch.

How We're Talking About It [WIP]

Target Audience

- US Teens

| Target Countries | Top App Language | Top Platform | Age |
|------------------|------------------|--------------|-------|
| 1 United States | English | iOS | 13-17 |

Positioning

Who We're Positioning Against:

- fbh
- Messenger
- Facebook

behavior — User Problem We're Solving:

- We know that as many as 20% of high school students in the US already add their high school name (and often grade) to their profile. This behavior is particularly common amongst students who are transitioning into high school from different middle schools.

Instagram Differentiators:

- **Private feature, private space:** Only certified high schoolers can add their high school to profile, and only certified students of each school can see the private directory of their school.
- **Directory:** Instagram is the first social platform teens use to add new people they meet. The directory will allow them to easily find their classmates in the place they first go to find them.
- **Product innovation:** This is the first time Instagram has built a feature of this kind. Additionally, none of our competitors have these kinds of private surfaces.

Positioning Statement:

- For teens who want to connect to other people in their high school, this update gives you a private space to find and interact with your classmates. Unlike on Snapchat and Twitter, once certified, you can add your school and grade to your profile, which you can tap into to unlock a private directory of your school, sorted by grade. This directory allows you to quickly follow and message anyone in your school.

Key Messages

- **Topline**
 - You can now join a directory just for your high school.
 - It's now easier than ever to connect with people in your high school.
- **Supporting**
 - **Just for high schoolers:** A private space just for high schoolers.
 - **Private space for your high school:** Only certified students of each high school can access the private directory for their school. They can easily find and message their classmates within this private space.
 - **A network for just your school:** Once you add your high school, you'll have access to a private directory of students in your school, sorted by grade. In one tap, you can start a direct message with anyone at your school.

Blog and Press Post

(TK)

Outreach Strategy [WIP]

Executive Summary

Support pilot program and medium-volume launch of high school networks, the first product just for teens, and leverage it as an opportunity to experiment with hyper-targeted outreach tactics optimized for US high schoolers.

- **Marketing** will focus on creating hyper-targeted, unique campaigns on launch and will leverage XFN partners to conduct qualitative research that will help us create never-before-done events, moments and activations to draw attention to the product launch.
- **Creative** will help Marketing create exciting and hyper-targeted in-person activations at launch.
- **Partnerships** will TK.
- **The Teen Ambassador Network** will help source leverage the Teen Ambassador Network to use in-person community activations, like WWIM, and partner with the Community Lab to create different and grassroots activations.

Outreach Playbook

| A | B | C | D | E | F | G | H | |
|---|-------------------|---|--|------------------------------------|-----------------------------------|----------------------|--------|------|
| 1 | Driver / Program | Tactic | Metric | Baseline | Metric Goal | Target audiences | Budget | Read |
| 2 | NORTH STAR | | | | | | | |
| 3 | All | All | Instagram is a place to connect with people with shared interests | 41% | Stat sig lift | US Teens | TBD | TB |
| 4 | All | All | Instagram is a place to express yourself with the app's creative tools | 19% | Stat sig lift | US Teens | TBD | TB |
| 5 | PER TACTIC | | | | | | | |
| 6 | Marketing/Brand | High School in Profile: High-volume launch of Pilot Program in 3 US Cities | S: IG is a place to connect with people with shared interests P: Increase US Teen DAP | S: 41% P: 17.4M US Teen DAP | Stat sig lift P: 17.8M DAP | US Teens in 3 Cities | TBD | TB |
| 7 | Research | High School in Profile: Qualitative marketing research in pilot cities | | | | | | |
| 8 | | Second Accounts: Product research to understand use cases, positioning, etc | | | | | | |

[WIP] Marketing [REDACTED]

Phase 1: Pilot Program (Low Volume)

Stay reactive and be prepared for any inbound press. Local outreach to schools in pilot.

Phase 2: US Launch (Medium/High Volume) — Q3

Reinvent playbook on launch day to optimize for US Teens

Launch at 4PM in each time zone in order to target after-school

Whitelist “the plug” (or Teen Ambassador) at noon of launch and have them build excitement at local high schools

Comms will announce the product launch at time of whitelist

Swag

Custom-gated QP

Hyper-targeted house ad campaign for high schoolers in key US cities

Marketing data has shown that the more granular targeting we use for house ad campaigns, the more effective our campaigns will be — take a page out of [REDACTED] tbh playbook and make our targeting super granular

Working with Media Strategy to devise targeting plan at local high-school level

Sustained house ad — what is the flow?

This is a thing

This is where you can use it

This is what you can do with it/how you make it your own

We get them to make one

(of these people who make it) how do I customize it

(of these people who customize it) where are they using it

On-platform marketing using owned channels (New! Story and Interstitial, following QP) to drive awareness and adoption at launch

Create marketing materials that showcase teens using nametag in everyday ways (at school, after school) accompanied by Interstitial that takes you to product flow

Hyper-targeted QP in weeks following launch to drive installs

Phone background their card

Mail them phone cases who have made their card their backgrounds

Possible Brand Campaign in target cities tied to Nametag and HS Networks Launch

Create custom brand campaign targeted to the cities we pilot for HS Networks, and feature new teens products in assets

Partnerships [REDACTED]

Comms [REDACTED]

Assets

Screenshots

Final Assets:

Resource:

Distribution:

*

Languages needed: en_EN, ja_JP, finnish

UI Translations:

Marketing Translations:

Total Number of Assets: XX screenshots

New! Story

Final Assets:

Resource:

Distribution:

Languages Needed:

Total Number of Assets: X videos x 8 locales = XX videos

Contact Support

[REDACTED] opened your conversation with [REDACTED]
D. [REDACTED]
Karina Newton, Brett Westervelt, [REDACTED]
Gabe Madway, A [REDACTED]
[REDACTED] Robert Chen (PM), [REDACTED]
2018 at 2:26 am [REDACTED] Apr 24,
[REDACTED]

[REDACTED] opened your conversation with [REDACTED]
[REDACTED]
[REDACTED] Brett Westervelt, [REDACTED]
Karina Newton, [REDACTED]
Gabe Madway, [REDACTED] A [REDACTED]
[REDACTED] Robert Chen (PM), [REDACTED]
23, 2018 at 11:21 pm [REDACTED] Apr

Karina Newton edited Apr 23, 2018 at 8:56 pm

- Policy: Karina Newton

Karina Newton opened your conversation with [REDACTED]
[REDACTED]
[REDACTED] Brett Westervelt, [REDACTED]
[REDACTED] Gabe Madway, [REDACTED]
[REDACTED] Robert Chen (PM), [REDACTED]
Apr 23, 2018 at 8:55 pm [REDACTED]

[REDACTED] added [REDACTED] and Karina Newton to the thread Apr 23, 2018 at 9:00 pm

[REDACTED] added you to a document Apr 23, 2018 at 8:53 pm

[REDACTED] added you to a document Apr 23, 2018 at 8:53 pm

[REDACTED] added you to a document Apr 23, 2018 at 8:53 pm

[REDACTED] edited Apr 23, 2018 at 8:52 pm

High School in Profile Directory - Product Messaging & Launch Doc. [working draft]

5-School 6-School Pilot Program: May 9

Run of Show: TK

Creative Brief: TK

TK based on final product specs. [REDACTED] to flesh out week of April 23

- We know that a large percentage TK% as many as 20% of high school students in the US already add their high school name (and often grade) to their profile. This behavior is particularly common amongst students who are transitioning into high school from different middle schools.
 - **Private space for your high school:** Only verified students of each high school can access the private directory for their school. They can easily find and message their classmates within this private space.
- Partnerships will TK

[REDACTED] renamed High School in Profile - Product Messaging & Launch Doc. [working draft] to High School Directory - Product Messaging & Launch Doc. [working draft] *Apr 23, 2018 at 8:56 pm*

[REDACTED] *Apr 17, 2018 at 3:33 pm*

Devi note this has been moved to 5/9

[REDACTED] edited *Apr 17, 2018 at 3:33 pm*

5-School Pilot Program: May 19

[REDACTED] opened your conversation with [REDACTED]
[REDACTED] Brett Westervelt.
[REDACTED] Karina Newton,
[REDACTED] Gabe Madway.
[REDACTED] Robert Chen (PM),
[REDACTED] Mar
26, 2018 at 9:14 pm

[REDACTED] added you to a document *Mar 16, 2018 at 10:30 pm*

[REDACTED] added [REDACTED] and [REDACTED] to the thread *Mar 16, 2018 at 10:33 pm*

[REDACTED] added you to a document *Mar 16, 2018 at 10:28 pm*

[REDACTED] edited *Mar 16, 2018 at 11:12 pm*

- For teens who want to connect to other people in their high school, this update gives you a private space to find and interact with your classmates. Once you're verified, you can add your school and grade to your profile, which you can click into to unlock a private directory of your school, sorted by grade. This directory allows you to quickly follow and message anyone in your school.

Support pilot program and medium-volume launch of Nametag high school networks, the first product just for teens, and leverage it as a first-ever opportunity to experiment with teen-first, never-before-tested hyper-targeted house ads and partner/community integrations outreach tactics optimized for US high schoolers.

- **Partnerships** will leverage teen creator events, namely Vidcon, to create high-touch moments with top teen partners and teen community members.
- **Community The Teen Ambassador Network** will help source leverage the Teen Ambassador Network to use in-person community activations, like WWIM, and partner with the Community Lab to create different and grassroots activations.

| A | B | C | D | E |
|---|---|-----------------|---|----------------------------|
| I | | Marketing/Brand | | High School in Profile: |

| | | | | |
|---|--------------|---|---|--|
| | | | | |
| 2 | | Research | | High School in Profile: Qualitative marketing research in pilot cities |
| 3 | | | Second Accounts: Product research to understand use cases, positioning, etc | |
| 4 | Partnerships | Instagram Cards: Harness teen partners at launch and use at teen partner events | % of creators who use product | n/a |

| | | | | |
|---|---------------------------|--|--|--------------------------------------|
| | | | | |
| 5 | Marketing/Brand/Community | In-person activations | S: IG is a place to connect with people with shared interests | S: TBD |
| 6 | Marketing/Brand/Community | Instagram Cards: On-Platform Channels (QP, Editorial) | S: IG is a safe place to express myself P: US Teen Time Spent | P: TBD |
| 7 | Marketing/Brand | Instagram Cards: House Ad Campaign (city-level targeting) with possible corresponding Brand campaign | S: IG is a place to connect with people with shared interests P: US Teen Time Spent | P: 30% |
| 8 | Community | Instagram Cards: Teen-focused WWIM that highlights new product | US DAP participants Teen Content Producers | 2.1% US DAP participants 20% Teen |

| | | | | |
|--|--|---------|----------------------------------|--|
| | | Teen PR | Content Producers 35% Teen PR | |
|--|--|---------|----------------------------------|--|

[WIP] Marketing Lizzy

Phase 1: Japan, Finland and Sweden Country Test Pilot Program (Low Volume)

Stay reactive and be prepared for any inbound press. In-app marketing featuring a QP Local outreach to schools in pilot.

Phase 2: US Launch (Medium (Medium/High Volume) — Q2

- QP targeted to teens in these markets
- Screenshots for press exclusive

Harness teen partners at launch and create custom activations for Nametag at Vidcon

All lanyards have this code on them

METRICS

% of onboarded creators who create a nametag

Goal: Onboard 300 top accounts to nametag / 50% of Vidcon attendees

Tactics:

- Making in-person friending a secondary theme for Instagram at Vidcon**
 - Take over the signing floor at Vidcon and encourage people add friends
 - Give everyone who adds a friend at Vidcon a custom “Vidcon” card skin
 - Sticker machines for IG Cards in Instagram booth
 - Badges for different nametag milestones, such as “Met Lele Pons,” “Added 50 friends using nametag,” etc.
- Whitelist 100 top creators before launch and have them create their nametag and share to story**
 - Work with partners to “gamify” this experience (e.g. — “I’ll DM 5 people who repost my card”)
 - Give them total customization over their cards and have them share before or day-of

Editorial Plan Christen

Use Teen Ambassador Network and community channels to create buzz and drive adoption

Metrics

US DAP Participants, % Teen Content Producers, Teen PR
Goal: 3% US DAP participants, 25% Teen Content Producers, 40% Teen PR

Tactics

- Give teen ambassadors early access to product and work with them to build excitement at local high schools**
 - New Teen Ambassador Program gives us newfound access to teens — let's leverage this by having “the plug” get access to the product before launch and have them grassroots tell their friends about it (in class, at assembly, after school, etc.)
 - Custom skins for certain high schools as a fun moment that encourages product adoption (similar to Vidcon)
 - Custom swag for teens, delivered on launch day
- Give Gaming Ambassadors in the UK early access to product to build excitement throughout the gaming community**

Metrics

Create awareness of product as a way to help teens stay connected on Instagram
 Drive adoption of the product, specifically amongst teen users at launch (and regionally during test)

Tactics**1. Test (3/26, Japan, Finland + Sweden, 96%):**

- Help Center post with light product details
- Proactive local outreach in Japan to drive awareness and adoption of product
 - Working with Comms lead in JP to coordinate outreach on the ground
- Share reactive messaging with more information + assets on background with any inbound media inquiries for Japan, Finland, Sweden
- Baseline reactive messaging for US

2. Launch (TBD):

- Press Center post
- Broad day-of outreach to tech/biz press, teen-friendly outlets, local/college outlets
- Amplify press outreach with Teen Kindness Prom event in late April — exclusive in outlet like BuzzFeed on event and product launch/usage as part of that (TBD, dependent on launch timing)
- Video or asset with teen tech influencer collaboration? (TBD, dependent on launch timing)

APPENDIX*MVP**

Engineering questions:

