

AMENDED Exhibit 75

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



META3047MDL-003-00091414-META3047MDL-003-00091504



TEEN MENTAL HEALTH

Creatures of Habit - Aug/Sep 2019

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RESEARCH APPROACH

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Methodology

Field sites: L.A. USA / London UK

- **Stage 1) Mini- groups - Creative exercises**

- Using creative techniques to create an environment where four strangers could share insights about their mental health. The research was designed to build rapport, and used projective techniques (Lego) to get young people to describe mental health in a 'safe' and detached way.
- Focus groups lasted 2 hours; covering representations of self, depictions of mental wellness & unwellness, the impact of social media on MH and what IG should do to support wellbeing online.

- **Stage 2) Follow up phone calls with 8x participants**

- Were designed to play back some of the findings with participants and gauge response after the sessions had ended. Sense-checking findings and pushing the insight further.

Sample

- 5x groups in each territory, split across gender, age and 'theme.
- 2x M 13-15 across markets, 2x M 16-18 across markets
- 2x F 13-15 across markets, 2x F 16-18 across markets
- Plus, 1x extra group in each market for no mental health issue (1x younger male in US, 1x older female in UK)
- Themes:
 - Body image, self-esteem, social pressure to be perfect, weight issues.
 - Negative mood, anxiety, feeling down, or a bit depressed.
 - Loneliness, isolation, unpopularity

Secondary criteria:

- Currently use at least one social media application
- Have used IG in the past month
- None to reject IG
- Screened for creative thinking and articulation.



TOPLINE HEADLINES

- Instagram is an inevitable and unavoidable component of teens lives. Teens can't switch off from Instagram even if they want to.
- Instagram has become the ID card of this generation. It is the go-to tool for both measuring and gathering social prestige.
- Instagram sets the standards not only for how teens should look and act but also for how they should think and feel.
- Teens feel themselves to be at the forefront of new social behaviours to which there is no consensus on how to behave or cope. They sorely lack empathetic voices to whom they can turn for support.
- Teens talk of Instagram in terms of an 'addicts narrative' spending too much time indulging in a compulsive behaviour that they know is negative but feel powerless to resist.
- The pressure to 'be present and perfect' is a defining characteristic of the anxiety teens face around Instagram. This restricts both their ability to be emotionally honest and also to create space for themselves to switch off.
- Anxiety around what to post and the potential cost involved in posting the wrong thing means teens are switching from proactive to passive engagement with the platform.



WELLBEING IN CONTEXT

What role does Instagram play in shaping emotional wellbeing and state of mind of young people more broadly?

In many ways, IG plays a positive role on MH.

Young people were quick to point out the positive role that IG plays in their personal and social lives.

'There are some great things about social media. Mostly that you can keep in touch and see things where you think "oh I'd like to try that" - UK Female

There are many aspects of the platform that make young people feel good:

- Getting social validation from likes, comments and followers
- Seeing 'trending' content that helps them be part of the crowd
- Watching or viewing content that expands their horizons, or arrests boredom
- Connecting with friends and family members
- Having an open record of the best parts of their lives
- Providing inspiration or stimulus to motivate them to be their best selves
- Source of role models and people to look up to
- Relatable content that helps them feel like they are not alone
- Memes and funny posts that lighten the mood
- Keeping up with news or issues around the world
- Being able to be nosey into other peoples lives

- IG is the ultimate connector; acting as a platform to connect young people to their social circles and to trends within popular culture.
- By being connected, young people can seek out people and information that help them feel less alone and more part of a collective.
- This points to why memes are so popular, as they allow political or real life struggles to be turned into resonant, yet light-hearted in-jokes.

Without Instagram, teens would miss out on the key to their social world; the vital network to connect with each other.

IG is the connector & key to the social world.

Instagram is a central figure in the way that young people connect and relate to each other.

'We're all feeling so much like we have to fit in, that as soon as someone mentions an influencer, you're on Instagram looking them up and following them. If you didn't keep up with what's going on, you'd 1000% feel like you were missing out. It's just not possible.' -
Female, UK

Young people aren't using the platform constructively.

Constructive uses of the platform for mental wellbeing were hypothetical rather than practical.

'You end up scrolling through the explore page for hours. Like you get stuck down a rabbit hole. And then you think - what have I been doing with my time? It seems so wasteful' - UK, Female

- Young people were open to how IG could help them constructively explore and enrich their lives; but it's not something they necessarily immediately connect to IG themselves.
- But in reality, despite this potential, the content they consume is fairly standard
- For all the talk of communities of interest, everyone still follows Kylie Jenner and gets excited about the same trainers.
- Support for MH was mostly conceived of as having 'positive quotes' to lift the mood for the day. But, the positive role that IG could play in helping provide social purpose and expand interests was harder to draw out from conversations.

Helping young people understand and focus on the constructive role that Instagram can play in their lives is the key to helping them build resilience.

- Instagram plays a significant role in how a young person feels about their day.
 - It could be a day where all your mates are liking your posts, leaving comments about how great you are, or a day where your supposed 'friends' are going out of their way to put you down and make you feel like crap.
- The boundary between social media and real life is blurred - and feelings and behaviours cross over between the two.
- Young peoples' sensitivity to content on Instagram creates a relationship between the platform and their daily state of mind - a mental connection that frames the platform in a positive or negative light.

Young people are aware that their daily experiences on IG plays a central role in their state of mind. Their feelings on that day dictate whether they view the platform and brand in a positive or negative light.

IG has the power to make or break your day.

IG plays a central role in teens' lives, and dictates how they feel about their day.

'I've had to stop myself looking at Instagram in the morning, because it has so much power to shape how I feel. So I just try to give myself the time to set my own day' - US, Female

Feelings in the moment dictate how well you cope.

In-the-moment feelings determines resilience to cope with content they see online.

- Underlying emotional states play a key role in a young person's ability to deal with the content they see. If they are having a bad day, they know they are more vulnerable to what they see online.
- This was particularly true for social comparison. The more a young person is feeling bad, the more vulnerable they are to negatively comparing themselves to others.
- Some young people were able to recognise the impact of looking at IG on their feelings for the day, and had tried to stop themselves looking at their feed in order to protect themselves.
- Others' recognised that they were still compelled to look at Instagram, even if they knew it would make them feel bad.

Young people need help in seeing the value of creating balance in their use of social media. Knowing when you need to take a break, and what steps make you feel better is important.

'When you're miserable you look at every comment on your profile and think that they comments are bad. You're feeling bad and so you think that people are giving you fake support, because you know your spotty and feeling fat' - UK Female

- As they vie for positions in the social hierarchy, young people are sensitively attuned to the words and actions of others; and relatively minor things (such as not getting a comment) can trigger off friendship ending processes.
- To deal with these social processes, teenagers have become the master scrutinisers of online behaviours.
- Things that adults would ordinarily overlook - such as not getting as many likes, or a seemingly unrelated comment - can kick off a whole set of reactions within the teen social world.
- Young people don't self harm or become anorexic overnight; there is a build up of smaller things that can ladder up to more serious conditions.

This presents a challenge because the majority of harmful behaviours are not things that would be flagged.

Small things are just as bad as the big ones.

When thinking of mental health, it's easy to jump to big things. But it's small stuff that builds up on a daily basis that has the most harm.

'It builds up and there is a point where every person breaks. If you don't get help, you're going to have a meltdown' - UK female

Teens are hooked despite how it makes them feel

Instagram is addictive, and time-spend on platform is having a negative impact on mental health

'Part of it [worst thing about IG] is just that it's just so addictive. Every time I pick up my phone it's the first thing I look at. At night when I should sleep, I just scroll through Explore' - UK, Male

- They have an addicts' narrative about their Instagram use - it can make them feel good, it can make them feel bad, they wish they could spend less time caring about it, but they can't help themselves.
- They recognise that without even thinking every time they pick up their phone, they automatically go to Instagram. They know they stay up later than they should and miss out on sleep to stay plugged in.
- But they also know that this isn't good for them or their mental health.
- At exam time, they recognise their lack of willpower and use apps to control their screen time and get away from social media.

Time-spend was one of the 'worst' aspects of teens' relationship to the platform. They were open to help reducing screen time, or making their experience more constructive.

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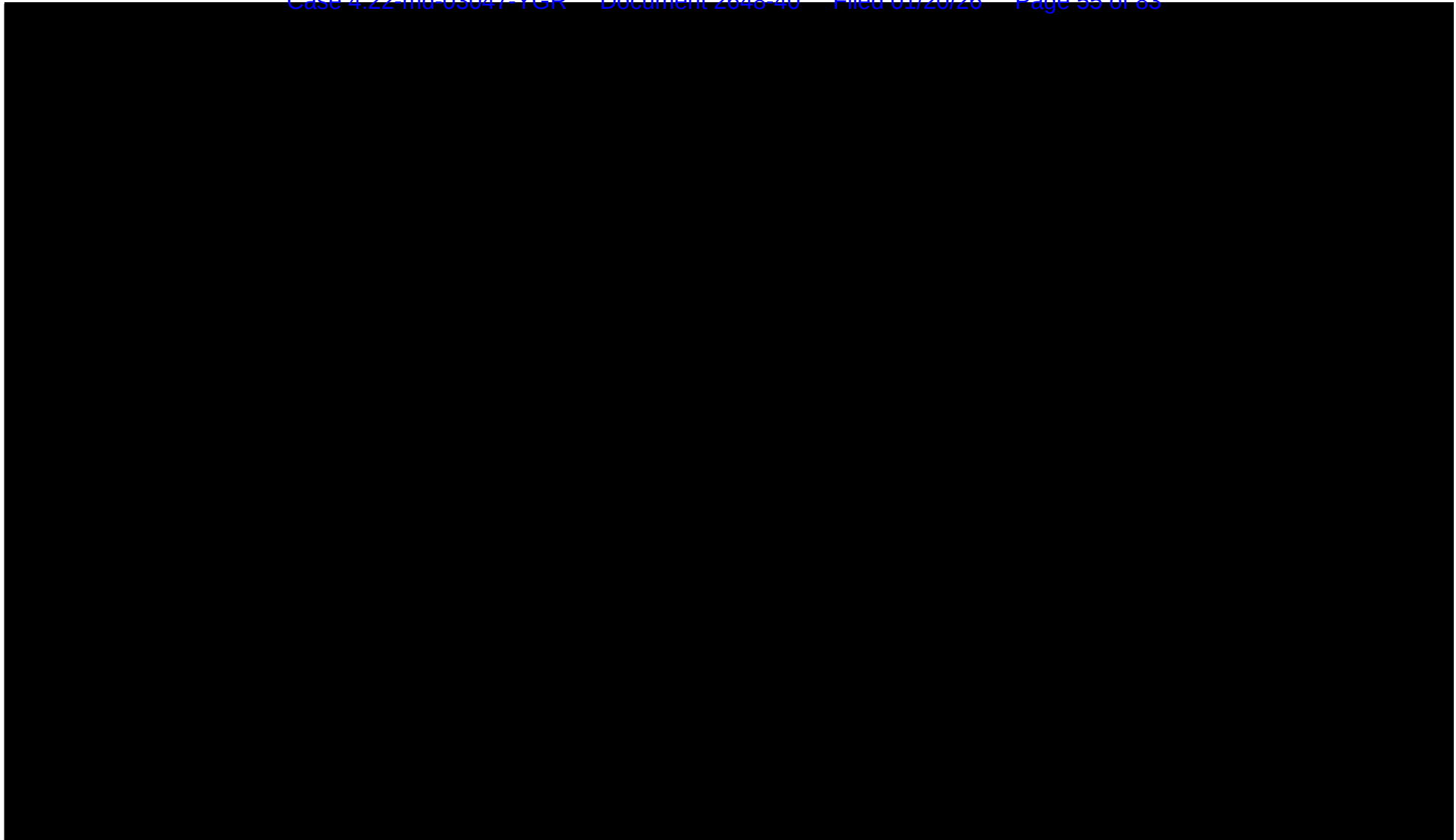
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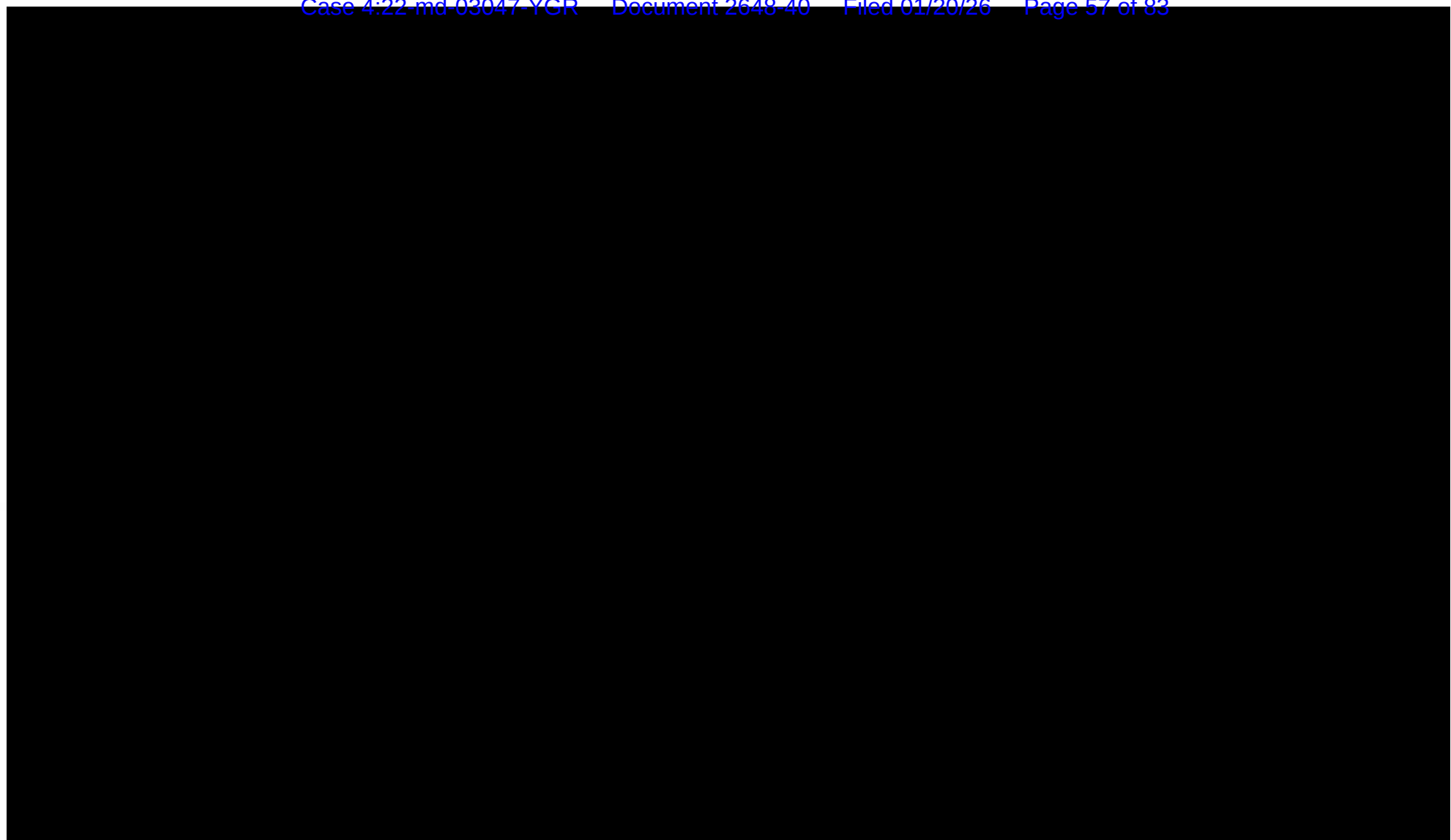
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