

AMENDED Exhibit 1001

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

Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA Case No. 4:22-MD-03047-
ADOLESCENT ADDICTION/ YGR MDL No. 3047
PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION MDL No. 3047

This Document Relates to:
ALL ACTIONS

30(B)(6)/PMQ FOR GOOGLE/YOU TUBE
VIDEOTAPED DEPOSITION OF ERIN TURNER
Wednesday, January 22, 2025
SAN FRANCISCO, CALIFORNIA

Reported By:

KATHLEEN A. MALTBIE, STENOGRAPHIC REPORTER
California CSR 10068, Nevada CCR 995, Texas CSR
12212, RPR-RMR-CRR-CCRR-CLR-CRC-RDR

1 is not in my area.

2 BY MS. HAILESELASSIE:

3 Q. You've never inquired of anyone why that's
4 the case?

5 A. No.

6 Q. Okay. I'll have marked now -- I believe
7 it's already been marked Exhibit 4.

8 (Whereupon, Deposition Exhibit 4
9 was marked for identification.)

10 BY MS. HAILESELASSIE:

11 Q. And I will represent to you that this is
12 an exhibit from another deposition that we did
13 earlier this year of -- Ms. Weikert -- who just
14 helped us identify the areas that you're going to
15 address with us. So you're welcome to look through
16 it, but it's mostly a list of names, programs,
17 features and groups within YouTube. So I'm just
18 directing you to the parts that are relevant to her
19 deposition.

20 So if you could look at page 9.

21 Do you see where it says, "Responsible
22 Content & Creators?"

23 MR. KRAMER: I'm going to object to the
24 characterization of the document.

25 But you can go ahead and look through.

1 THE WITNESS: What page is that on?

2 BY MS. HAILESELASSIE:

3 Q. This is page 9.

4 A. Page 9.

5 Okay.

6 Q. Okay. It lists a couple of things that
7 YouTube suggests we talk to you about, a teen
8 wellbeing classifier and age appropriate classifier.

9 Do you see that?

10 A. I see that, yes.

11 Q. Okay. And I'm just showing you that so
12 you understand what's guiding a lot of my
13 questioning today.

14 Do you understand?

15 A. Okay.

16 Q. So the Teen Wellbeing classifier, and then
17 in parentheses, it specifies Volume Impacts
18 Wellbeing.

19 Are you generally knowledgeable about that
20 product?

21 MR. KRAMER: Objection to form.

22 THE WITNESS: This is a product my team is
23 responsible for.

24 BY MS. HAILESELASSIE:

25 Q. Is it a product you're generally

1 knowledgeable on?

2 A. Yes.

3 Q. Okay. And this is the project termed VIBE
4 as an acronym for volume impacts wellbeing, correct?

5 A. Correct.

6 Q. Can you please explain to the jury what a
7 classifier is?

8 MR. KRAMER: Objection to form.

9 THE WITNESS: A classifier is a way for us
10 to identify content and make a definition of
11 content, and then use a model to identify that
12 content at scale.

13 BY MS. HAILESELASSIE:

14 Q. Would it be accurate to say that it's an
15 algorithm that automatically categorizes content?

16 MR. KRAMER: Objection to form.

17 THE WITNESS: You could say it is an
18 algorithm that identifies content that meets a
19 certain definition, a specific definition.

20 BY MS. HAILESELASSIE:

21 Q. Okay. So you understand how classifiers
22 are operationalized?

23 A. Correct.

24 MR. KRAMER: Objection to the form.

25 / /

1 BY MS. HAILESELASSIE:

2 Q. Do you have a technical understanding of
3 how they work?

4 A. When you say "operationalize," can you
5 give me some more examples of what you mean?

6 Q. Well, you agreed that you understand how
7 they're operationalized.

8 I mean, do you have a technical
9 understanding of how classifiers work?

10 A. Well --

11 MR. KRAMER: Objection.

12 Sorry.

13 Objection to form. Object.

14 Mischaracterizes testimony.

15 THE WITNESS: So I'm -- I'm asking you
16 to -- I responded before asking you to clarify what
17 you mean by "operational." That means something to
18 me that might be different from what you're
19 asking --

20 BY MS. HAILESELASSIE:

21 Q. What does it mean to you?

22 A. -- so I'm asking for clarification.

23 Q. What does it mean to you?

24 A. To me, that means that we identify the
25 content that we're looking to identify and build a

1 model that can identify that content. And then we
2 deploy that model.

3 Q. Do you work on the technical aspects of
4 that model?

5 A. I am --

6 MR. KRAMER: Objection to form.

7 THE WITNESS: I am not an engineer.

8 BY MS. HAILESELASSIE:

9 Q. Okay. And the teen wellbeing classifier,
10 once it identifies content or categorizes content,
11 is there another step to the functioning of it?

12 MR. KRAMER: Objection to form.

13 THE WITNESS: So there are two steps. One
14 is identification of content, and then the treatment
15 of that content.

16 BY MS. HAILESELASSIE:

17 Q. Okay. And is there -- are there various
18 types of treatment that might occur?

19 A. There are a whole range of ways content
20 could be treated.

21 Q. What -- which ways?

22 A. Well, can you -- can you be specific about
23 what you're -- what you're asking for?

24 Q. I -- I can't because my -- that's my
25 question to you, what -- what might it do with the

1 content after it's identified?

2 MR. KRAMER: Objection to form.

3 THE WITNESS: Well, the goal of the -- of
4 this particular classifier is to identify content
5 and treat it in recommendations. So in this case,
6 treatment could be dispersing content.

7 BY MS. HAILESELASSIE:

8 Q. And when you say "dispersing," do you mean
9 removing it from recommendations?

10 MR. KRAMER: Object to form.

11 THE WITNESS: So as you can see in this
12 exhibit, this classifier is volume impacts
13 wellbeing. And this content is content that is not
14 problematic in a single view. And so, therefore,
15 the content is -- based on input from our experts,
16 is dispersed.

17 BY MS. HAILESELASSIE:

18 Q. Okay. When it's dispersed, where does it
19 go?

20 A. So dispersion would mean that it is
21 reduced, the concentration of the content would be
22 reduced.

23 Q. Okay. Are there any other classifiers
24 used by YouTube that disperse content related to
25 teen wellbeing other than the teen wellbeing

1 classifier --

2 MR. KRAMER: Objection.

3 BY MS. HAILESELASSIE:

4 Q. -- that is listed here?

5 MR. KRAMER: Objection to form.

6 THE WITNESS: There is a huge amount of --
7 a huge number of safeguards in place across YouTube
8 for all of our teen and adult users. This is one of
9 many that are in place to provide a responsible
10 experience.

11 BY MS. HAILESELASSIE:

12 Q. And are any of those that you just
13 mentioned specifically related to teen wellbeing
14 other than the teen wellbeing classifier?

15 MR. KRAMER: Objection to form.

16 THE WITNESS: I would say all of those
17 support teens to some degree, teen wellbeing. The
18 goal of -- as you asked me earlier, the goal of
19 responsibility is to have an experience that is
20 providing guardrails on safety and quality, and
21 YouTube has done extensive work in that area for
22 both teen users and adult users. So this is one of
23 many that will support teens' wellbeing and their
24 experience on YouTube, their experience with content
25 on YouTube.

1 BY MS. HAILESELAASSIE:

2 Q. Okay. Are there certain categories of
3 content that the teen wellbeing classifier is
4 seeking to disperse?

5 A. Yes.

6 Q. What are they?

7 A. So these -- the -- this classifier covers
8 several categories. I actually have a question for
9 you. I have a -- maybe something that might be ...

10 MR. KRAMER: Can we go off the record?

11 THE VIDEOGRAPHER: Time is now 11:11.
12 Going off the record.

13 (Off video record only.)

14 MS. HAILESELAASSIE: There's a pending
15 question.

16 THE REPORTER: I'm sorry, do you agree to
17 go off the record?

18 MS. HAILESELAASSIE: There's a pending
19 question.

20 MR. KRAMER: Is it a privilege concern?

21 THE WITNESS: I have a question about the
22 time period.

23 MR. KRAMER: Oh, sorry. We can go on the
24 record. I thought it was a privilege concern.

25 THE WITNESS: I wasn't sure if it would be

1 privileged or not.

2 Maybe the question is for you.

3 Is the question of the time period?

4 MR. KRAMER: Sorry, can we go back on the
5 record?

6 THE VIDEOGRAPHER: Time is now 11:11.
7 Back on the record.

8 THE WITNESS: Can you clarify the time
9 period you're looking for?

10 BY MS. HAILESELASSIE:

11 Q. So if -- if it started as one thing and
12 then it evolved, then that is part of my question as
13 well, and we can explore that a bit. But I am just
14 trying to find out what -- what is covered by the
15 teen wellbeing classifier, the categories of --

16 A. Okay.

17 Q. -- of content?

18 A. So we're always expanding and improving
19 these, and this -- this classifier currently covers
20 five categories of content.

21 So one category is physical -- social
22 comparison of physical appearance. Another category
23 is social aggression. More recently, we have
24 added -- let's see. We've added three new
25 categories. We've added financial -- wealth

1 obsession, hostility and disrespect towards others.
2 I'm trying to remember the third one. I can't
3 remember the third one off the top of my head, but
4 we have five categories. So this has expanded since
5 it was launched.

6 Q. Okay. That's -- that's fine. If you
7 think of it later, we can come back to it and you
8 can just let me know you remembered the last one.

9 Are you generally knowledgeable about the
10 creation of VIBE, the origins of the VIBE product?

11 A. Yes.

12 Q. Okay. And I think you've already answered
13 this, but it sounds like VIBE was created in
14 recognition of the fact that there is some content,
15 although not prohibited, it is problematic to
16 youthful viewers when viewed repeatedly; is that
17 accurate?

18 MR. KRAMER: Objection to form. Lack of
19 foundation. Mischaracterizes testimony.

20 THE WITNESS: So as I mentioned earlier,
21 there is a very extensive -- there are a very
22 extensive set of classifiers intended to deliver
23 responsible experience for all of our users,
24 including teens on YouTube. And we looked at where
25 we had small gaps to fill in. And this was one area

1 that we identified together with our expert
2 committee.

3 And as you -- you asked me -- the nature
4 of the content is content that is not violative, not
5 borderline, but potentially, for some users, in
6 volume may have some effect on their wellbeing.

7 BY MS. HAILESELASSIE:

8 Q. Okay. So it's the volume that's the --
9 that's the issue, more so than the content, correct?

10 A. Yeah, that's correct.

11 Q. Okay. [REDACTED]

12 [REDACTED]

13 [REDACTED] And then in parentheses, it says (as
14 read):

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 A. I think there's some inaccuracy here.

20 So --

21 Q. Okay. Well, and let me step back for a
22 minute, because I don't think we have actually
23 defined MFK, but that is made for kids, right?

24 A. MFK is made for kids.

25 Q. What is -- what is the inaccuracy?

Page 72

[illegible]

Page 73

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[REDACTED]

Category	Percentage
Very important	10%
Important	30%
Not important	60%

7 A. The --

8 MR. KRAMER: Objection to form.

--	--	--	--

16 BY MS. HAILESELASSIE:

17 Q. Okay. We'll probably come back to this.

18 If you'll just turn to the page 15. At
19 the top under "Digital Wellbeing Features," you were
20 listed along with the teen wellbeing features. I'm
21 just getting there myself. (As read):

22 Teen wellbeing classifier (to
23 reduce concentration of
24 non-violative content that is
25 potentially harmful to teens in

1 high volume.)

2 Do you see that?

3 A. Yes.

4 Q. Is that the same thing that we've just
5 looked at, VIBE?

6 A. Yes.

7 Q. And do you know what the 2022 in
8 parentheses refers to next to this classifier?

9 A. That refers to when this was -- this work
10 was launched.

11 Q. All right. I'm going to have marked
12 Exhibit 5 -- you can put that one to the side.
13 Thank you.

14 Okay. Actually, before we take a look at
15 5, does your work -- so your work extends to YouTube
16 Kids, correct?

17 A. Yes.

18 Q. And do you work on YouTube shorts?

19 A. My -- our signals are applied to YouTube
20 shorts.

21 (Whereupon, Deposition Exhibit 5
22 was marked for identification.)

23 BY MS. HAILESELASSIE:

24 Q. Okay. So taking a look at what has been
25 marked as Exhibit 5, this Bates -02480437 is an

[REDACTED]

11

1

2

17 (Whereupon, Deposition Exhibit 10
18 was marked for identification.)

20 Q. This is an email with the Bates
21 ending -02490539. And it is an email from
22 [REDACTED] to you, Ms. Turner.

24 A. [REDACTED] is a member of the new GAPP
25 team.

1 Q. What is the GAPP team?

2 A. Government affairs and public policy.

3 Q. This email is dated April 17th, 2023.

4 And what is the subject?

5 A. The subject says (as read):

6 [Just us] regarding
7 privileged -- Re: privileged KOF
8 pov: on biggest teen protection
9 needs.

10 Q. Okay. And if you will turn to -0540, do
11 you see your message to [REDACTED] starting this thread?

12 MR. KRAMER: Objection to the form.

13 BY MS. HAILESELASSIE:

14 Q. Is that the first email in the thread, or
15 email to [REDACTED]?

16 A. I'm just reading -- I'm just reading this
17 here.

18 I -- I can't really tell from this whether
19 this was the first email in that thread. But I
20 don't know -- yeah. I can't tell for sure if this
21 was -- if there was something before that.

22 Q. Okay. Well, I will represent to you, I
23 haven't removed anything from this document, and did
24 not -- did not see any others with earlier emails,
25 but I understand you're telling me that you can't

1 represent that that is the initial one in the
2 thread. But at least on this document, there is an
3 email on April 5th, 2023 at 9:55 p.m.

4 And you are writing to -- is it [REDACTED] and
5 [REDACTED] Is that correct?

6 A. That's what it says here.

7 Q. Okay. Do you know who [REDACTED] is?

8 A. [REDACTED] is another member of the same team
9 [REDACTED] is on.

10 Q. And that's --

11 A. Government affairs and public policy.

12 Q. Okay. And your message starts off (as
13 read):

14 Privileged. [REDACTED], please
15 advise.

16 Do you see that?

17 A. I do.

18 Q. Who is [REDACTED], if you know?

19 A. That would have been [REDACTED], who is
20 one of the recipients on this email.

21 Q. Okay. And will you please read your
22 email?

23 A. (As read):

24 Privileged: [REDACTED], please

25 advise. Hi, [REDACTED], during

1 Q2 I am leading an xfn team (those
2 on cc) to pull together our
3 holistic teen wellbeing road map
4 and a go-to market plan for H2.
5 One thing we'd like to understand
6 from a KOF point of view is our
7 biggest opportunity areas. We have
8 a weekly working session with most
9 on this thread. Can you make time
10 to join us next week to share your
11 point of view on the top three to
12 five issues? We're looking for a
13 rough stack ranking.

14 Q. Okay. So what -- what is the information
15 you're trying to get from them?

16 A. We take a broad view in trying to
17 understand from our users what's happening with
18 their needs and also other stakeholders in the -- in
19 the marketplace. So, for example, keeping formers
20 and regulators so we can pull together a holistic
21 picture of what our user needs and risks might be.

22 Q. And KOF is key opinion formers?

23 A. That's correct.

24 Q. You mentioned regulators.

25 Are regulators key opinion formers?

1 A. That is a broad term that we use, but
2 typically they -- they could be.

3 Q. Who else would be a key opinion informer?

4 MR. KRAMER: Objection to the form.

5 THE WITNESS: That -- that is the term
6 that typically our government affairs team would
7 use. I don't know who else would fall into that
8 bucket.

9 BY MS. HAILESELASSIE:

10 Q. Would it include users of YouTube?

11 MR. KRAMER: Objection to the form.

12 THE WITNESS: Users are -- are our biggest
13 priority. We are very user centered in
14 understanding their needs, but we also like to
15 understand the landscape as a whole and what other
16 issues may be of impact to our users.

17 So regulators and how they are seeing the
18 needs of our users are an important data point for
19 us.

20 BY MS. HAILESELASSIE:

21 Q. Are users included in the term "key
22 opinion formers"?

23 MR. KRAMER: Objection to the form.

24 THE WITNESS: They are -- they are not.

25 / /

Page 8

1 JANUARY 22, 2025 9:38 A.M. PACIFIC TIME

2 P R O C E E D I N G S

3
4 MORNING SESSION

5 THE VIDEOGRAPHER: We are now on the
6 record. My name is Darnell Brown, and I'm the
7 videographer with Golkow. Today's date is
8 January 22nd, 2025, and the time is 9:38 a.m.

9 This video deposition is being held in
10 San Francisco, California, in the matter of Social
11 Media Adolescence Addiction Personal Injury, for the
12 United States District Court, for the Northern
13 District of California.

14 The deponent is Erin Turner.

15 Counsel, could you please identify
16 yourselves.

17 MS. HAILESELASSIE: My name is
18 Jade Haileselassie. I'm with MotleyRice, and I
19 represent the plaintiffs in this action, both the
20 personal injury plaintiffs and the school districts.

21 MS. TRUONG: An Truong, Simmons Hanly
22 Conroy, for plaintiffs as well.

23 MR. KRAMER: Andrew Kramer from Wilson
24 Sonsini for YouTube.

25 MS. VALLES: Lizette Valles from Wilson

1 Sonsini for YouTube.

2 MR. BERKLEY: Demarron Berkley, in-house
3 counsel for YouTube and Google.

4 THE VIDEOGRAPHER: Counsel over Zoom?

5 MR. WHITE: Kevin White of Gibson Dunn &
6 Crutcher on behalf of TikTok defendants.

7 MS. URBAN: Marissa Urban on behalf of
8 YouTube.

9 MR. FLASTER: This is Eben Flaster with my
10 colleague Katelyn Romeo from -- excuse me. Shook,
11 Hardy & Bacon, LLP, in Philadelphia, representing
12 the Meta defendants. Thank you.

13 THE VIDEOGRAPHER: The court reporter is
14 Kathleen Maltbie, who will now swear in the witness.

15 ERIN TURNER,

16 having been duly sworn,

17 was examined and testified as follows:

18 EXAMINATION BY MS. HAILESELASSIE

19 BY MS. HAILESELASSIE:

20 Q. Good morning, Ms. Turner. You've already
21 heard me introduce myself, and I have had a chance
22 to meet you, but I want to introduce myself again.

23 I represent the plaintiffs, as you heard
24 me say, in this action. The plaintiffs are hundreds
25 of personal injury plaintiffs, and those are

1 children and their parents, and I also represent
2 school districts. And many of those plaintiffs
3 allege they have been injured by the conduct of
4 YouTube.

5 Do you understand that?

6 A. Yes.

7 Q. And we're here this morning in
8 San Francisco to take your deposition. You've been
9 sworn in by the court reporter, and you're under
10 oath that you're going to testify truthfully.

11 Are you committed to doing that today?

12 A. Yes.

13 Q. And that means, even though we're here in
14 this lovely courtroom -- this conference room, your
15 deposition today has the same effect as if you were
16 testifying before a judge and a jury, even though
17 they are not here. It is being videotaped and is
18 also being recorded stenographically. There's a
19 written record that's going to be produced. And
20 either the video or the written record can be
21 presented in court, or used for any purpose that's
22 authorized under the state and federal rules.

23 Do you understand that?

24 A. Yes.

25 Q. Do you have any questions about that?

1 A. No.

2 Q. Okay. And I'm sure -- I'm sure you've
3 been well prepared by your counsel for the
4 proceedings today, but just so we have a record
5 that's on the record that we're all on the same
6 page, I do want to go over some ground rules.

7 So I think the court reporter has already
8 mentioned a few of them, and you're already doing
9 some of it, just responding verbally, so that's
10 right. But I would just go over that, put it on the
11 record. So we talked about your responses should be
12 verbal. It's very natural in conversation, as you
13 go along, that you might nod your head or shake your
14 head, but the court reporter can't record that. So
15 in the event that that happens, I'll just remind
16 you.

17 Another thing that happens that's pretty
18 natural in conversation is that we might speak over
19 each other. But what we'll try to do today is I'll
20 finish my question, your counsel may have an
21 objection, and even if your counsel objects, you
22 should still answer the question. There may come a
23 point where we do speak over each other and have to
24 go back and do it in order, question, objection,
25 answer. That kind of happens often in depositions.

1 But if it does, nobody is doing anything wrong,
2 we've just kind of lapsed into that natural
3 conversation situation.

4 Do you -- do you understand?

5 A. Yes.

6 Q. Okay. And you can take a break at any
7 point. I generally like to go for about an hour and
8 a half, but if you need to take a break, the only
9 thing that I would ask is that if there's a pending
10 question, that you do answer the question and then
11 I'm happy to let you take a break. You're certainly
12 not captive to this -- to this questioning today.

13 Do you understand?

14 A. Yes.

15 Q. Okay. Is there anything that would affect
16 your memory today?

17 A. No.

18 Q. Did you get a good night's sleep last
19 night?

20 A. Yes.

21 Q. Is there anything that would affect your
22 ability to tell the truth today?

23 A. No.

24 Q. Okay. And we are here today in
25 San Francisco in the office of Wilson Sonsini.

1 Are you represented by the attorneys here
2 at Wilson Sonsini?

3 A. Yes.

4 Q. Did you sign an engagement letter with
5 them?

6 A. No.

7 Q. Okay. Are you paying them to represent
8 you?

9 A. Let's go back. When you say they're
10 representing me, what do you mean? They're
11 representing YouTube, and I'm an employee of
12 YouTube.

13 Q. Okay. Have you signed an agreement
14 with -- and when you say "YouTube," you consider
15 yourself an employee of YouTube?

16 A. I'm an employee of Google, and I
17 specifically work at YouTube, which is owned by
18 Google.

19 Q. Okay. And it's your understanding that
20 Wilson Sonsini represents Google?

21 A. Correct.

22 Q. Okay. And represents YouTube as well,
23 obviously?

24 A. Yes.

25 Q. Okay. And have you signed an agreement

1 with -- I'm gonna say "Google." When I refer to
2 "Google," please understand that unless I specify, I
3 am referring to Google and YouTube as well.

4 A. Mm-hmm.

5 Q. Have you -- have you signed an agreement
6 with Google regarding your representation?

7 A. No.

8 Q. Okay. Do you consider that your interests
9 are the same as Google's in this litigation?

10 MR. KRAMER: Objection to form.

11 THE WITNESS: Can you clarify?

12 MR. WHITE: Counsel, could we get a
13 stipulation that an objection for one is an
14 objection for all?

15 MS. HAILESELASSIE: Of course.

16 THE WITNESS: I'm not sure I understand
17 the question. Can you clarify what you mean?

18 BY MS. HAILESELASSIE:

19 Q. Sure.

20 Sometimes in litigations, interests can
21 diverge. So the reason I'm asking this is really to
22 preface the question. If -- if you feel at any
23 point today that -- that your interest diverge with
24 Google's, do you understand that you would still be
25 obligated to tell the truth even though you're

1 represented by Google's attorneys?

2 A. Yes.

3 Q. Okay. And that's really all I was getting
4 at.

5 Okay. So I think I've already covered
6 this, but just for the record, we're going to be
7 talking about YouTube as a platform in this
8 deposition, and then Google is -- do you understand
9 them to be the parent company of YouTube?

10 A. Yes.

11 Q. And so when I'm referring to YouTube, I am
12 referring to the platform.

13 Have you spoken with anyone, other than
14 your attorneys, about your deposition?

15 A. Only my manager.

16 Q. Okay. And who is your manager?

17 A. James Beser.

18 Q. Did you discuss your potential testimony
19 with Mr. Beser?

20 A. No.

21 Q. Did you discuss the litigation generally
22 with Mr. Beser?

23 A. Only that I was going to be deposed.

24 Q. And you haven't had any other
25 conversations with employees of Google regarding

1 your deposition?

2 A. No.

3 Q. Have you had conversations with any former
4 employees about the -- about your deposition? Any
5 former -- strike that.

6 Have you had any discussions with former
7 employees of Google about your deposition?

8 A. No.

9 Q. How many times did you meet with the
10 attorneys at Wilson Sonsini about your deposition?

11 A. A handful of times.

12 Q. Was it five times or less than five times?

13 A. That sounds about right.

14 Q. And when you met with your attorneys at
15 Wilson Sonsini, how many hours did you meet with
16 them on each occasion, approximately?

17 A. A couple of hours.

18 Q. A couple of hours approximately five
19 times; is that accurate?

20 MR. KRAMER: Objection to form.

21 THE WITNESS: That sounds about right.

22 BY MS. HAILESELASSIE:

23 Q. Okay. So about ten hours in meetings with
24 your attorneys ahead of your deposition?

25 A. Give or take, that sounds about right.

Page 17

1 Q. Okay. Somewhere between ten and 15 hours,
2 do you think?

3 A. Probably less.

4 Q. Okay. Less than 15, but more than ten?

5 A. I would say ten is about right.

6 Q. Okay. And did you review any documents in
7 preparation for your deposition?

8 A. Yes.

9 Q. Approximately how many documents did you
10 review?

11 A. Also probably around ten.

12 Q. Okay.

13 MS. HAILESELASSIE: And just for the
14 record, are all of those documents that were
15 produced in this litigation?

16 MR. KRAMER: They are.

17 BY MS. HAILESELASSIE:

18 Q. Okay. At this time, I'm going to have
19 marked your notice of deposition. So -- sorry, this
20 is Tab A.

21 MR. KRAMER: Sorry, Jade, I didn't want to
22 interrupt. I got a note that it's hard for people
23 on Zoom to hear the witness and Jade.

24 THE VIDEOGRAPHER: Time is now 11 -- time
25 is now 9:49. Going off the record.

1 (Whereupon, a recess was taken from
2 9:49 a.m. to 9:54 a.m.)

3 THE VIDEOGRAPHER: Time is now 9:54.
4 We're back on the record.

5 MS. HAILESELASSIE: Okay. Thank you.

6 BY MS. HAILESELASSIE:

7 Q. So before we went on break, I was marking
8 what is going to be -- and I'll just say this for
9 the first exhibit, we've got a great naming
10 convention here, it's GoogleYouTube Turner 1. And
11 it is your notice of deposition.

12 (Whereupon, Deposition Exhibit 1
13 was marked for identification.)

14 BY MS. HAILESELASSIE:

15 Q. Have you seen your deposition notice
16 before?

17 A. Yes.

18 Q. Okay. And I -- I think other than the
19 start time, that all looks to be in order?

20 A. Yes.

21 Q. Okay. Thank you. And you can -- you can
22 put that aside.

23 I am going to have marked now Tab B. This
24 is your CV from LinkedIn that was produced by the
25 attorneys for Google in this case.

1 done. I don't know what other teams may have done.

2 BY MS. HAILESELASSIE:

3 Q. Okay. I'm marking Exhibit 17. I just
4 have a couple questions on this one.

5 (Whereupon, Deposition Exhibit 17
6 was marked for identification.)

7 BY MS. HAILESELASSIE:

8 Q. This is -- it's titled "Outline of [REDACTED]
9 promo." It has a Bates number of -02509749. And it
10 was produced by Google's attorneys from your
11 custodial file. You're the only custodian on it.
12 You are also the author.

13 Does this document have to do with your
14 subordinate, [REDACTED] promotion?

15 A. Yes, it does.

16 Q. And was this a report that you were
17 preparing in support of her promotion?

18 A. That's correct.

19 Q. Okay. I just want to come down to the
20 bottom of -9749.

21 Can you read Numbers 1 and 2 going over to
22 the top of -9750?

23 Can you read it aloud?

24 A. Sorry, you are asking me to read it?

25 Q. Yes, please.

1 A. (As read):

2 ██████ is in the bull's-eye of
3 two of YouTube's biggest
4 challenges, and she has shown she's
5 more than capable of leading
6 multiple strategies -- multiyear
7 strategies and delivery end to end.
8 Number 1, supporting teen wellbeing
9 via content classifiers and
10 treatments, one of the biggest
11 concerns in society today among
12 parents, law makers and teens
13 themselves. Identifying what
14 content has the potential to
15 negatively impact some teens in
16 repetition required extensive
17 research with experts, thoughtful
18 template iteration and model score
19 reviews to avoid overreach, novel
20 metric approaches to define
21 concentration per recommendation
22 surface and to sample accordingly,
23 and had strong narratives to
24 executives who were skeptical when
25 this work was started, but

1 exceedingly happy it had already
2 been done when the regulatory tide
3 shifted abruptly this year.

4 Number 2, driving responsible
5 teen watch time growth. An
6 existential issue, YouTube is
7 losing ground to teens with TikTok
8 and other competitors. [REDACTED] was
9 asked to step in and develop a
10 strategy in Q1 when the year had
11 already started. She dove deep
12 into the user research and
13 recommendation system with her eng
14 partners to turn around a strong
15 set of pillars and treatments with
16 amazing speed. Through rapid
17 execution, the team delivered XX
18 launches, and she's worked hard --
19 within three quarters, she's worked
20 hard to refine and clarify the big
21 ideas.

22 Q. Thank you.

23 So does -- does this document refresh your
24 recollection as to YouTube's fierce competitiveness
25 with TikTok and other social media competitors?

Page 276

1 MR. KRAMER: Objection to the form.

2 THE WITNESS: YouTube -- can you say more
3 about -- you said fierce competition.

4 BY MS. HAILESELASSIE:

5 Q. You said YouTube is losing ground with
6 teens to TikTok and other competitors, right?

7 And you said that responsible -- well, let
8 me just --

9 Right? You wrote that?

10 A. I -- I wrote that, correct.

11 Q. Okay. And driving responsible teen watch
12 time growth is an existential issue for YouTube,
13 right?

14 A. That's --

15 MR. KRAMER: Objection to form.

16 THE WITNESS: That is what this summary
17 says.

18 BY MS. HAILESELASSIE:

19 Q. Okay. And did you -- did you mean by that
20 that YouTube might one day cease to exist if it
21 cannot responsibly grow teen watch time?

22 MR. KRAMER: Objection to form.

23 THE WITNESS: I wouldn't agree with that
24 characterization. [REDACTED] was asked to look at how
25 content was relevant to this audience in an interim

1 basis, and came up with a strategy to do so as
2 related -- as stated here.

3 BY MS. HAILESELASSIE:

4 Q. Okay. But you -- you did write that
5 driving responsible teen watch time growth is an
6 existential issue and that YouTube is losing ground
7 with teens to TikTok and other competitors.

8 I want to -- I want to just go back up to
9 the -- let's talk about what's under that. So you
10 said she deep dove this, and then there was some
11 pushback -- sorry, that is up in paragraph 1, there
12 was some pushback from executives when this work was
13 started, right?

14 MR. KRAMER: Objection to the form.

15 THE WITNESS: When we start any new
16 project, we will often get questions on the work.
17 And so that's what I'm referring to. But that's
18 every single project that is new gets some
19 skepticism. And ultimately, that work was -- was
20 still approved and moved very quickly. So this is
21 speaking more to her ability to explain the need and
22 get approval to move forward with the work.

23 BY MS. HAILESELASSIE:

24 Q. Do you understand what was driving the
25 skepticism in this particular case?

1 MR. KRAMER: Objection to form.

2 THE WITNESS: As I mentioned, any new
3 project is going to have some skepticism because
4 it's committing -- whether -- whether it's
5 modernizing the app or working on responsibility,
6 it's something where there'll be new resources and
7 commitments. And so it's the job of my team or any
8 team to explain why this work should be an
9 investment.

10 BY MS. HAILESELASSIE:

11 Q. Do you recall which executives were
12 skeptical?

13 A. I don't recall.

14 Q. And what you expressed here is that those
15 skeptical executives were happy when the regulatory
16 tide shifted abruptly, right?

17 A. That's what I stated here.

18 Q. Okay. So I don't -- I don't think there's
19 anything you mentioned here about these executives
20 being happy with the product itself and the results
21 of the product.

22 It was just when the regulatory tide
23 shifted, right?

24 MR. KRAMER: Objection to the preamble.
25 Objection to the form of the question.

1 THE WITNESS: So this is not a
2 comprehensive summary of the response from
3 executives. We got quite a bit of support in
4 rapidly executing the project and on the fact that
5 it was launched. In a review like this, there is a
6 word limit, and so this is a highly summarized
7 snippet that doesn't provide the full context on the
8 support from executives for this project.

9 BY MS. HAILESELASSIE:

10 Q. Okay. I just want to have you go back to
11 Exhibit 16. Page 94, slide 94.

12 Begins "teen wellbeing is a huge problem."

13 Do you see the statistic 42 percent of
14 U.S. high school students said they felt
15 persistently sad or hopeless?

16 A. I'm just looking to catch up with you.
17 Which deck are we looking in?

18 Q. Exhibit 16, page -- slide 94.

19 Do you see that statistic?

20 A. I'm -- I'm looking for the same page.
21 Give me just a second here. Oh, yes.

22 Q. And do you see also the quote (as read):

23 Teen girls who persistently
24 felt sad or hopeless increased
25 dramatically from 2011 to 2021

1 jumping from 36 percent to
2 57 percent.

3 A. I see these stats.

4 Q. Okay. Do you understand that period from
5 2011 to 2021 to be a period during which there was
6 widespread adoption of social media applications,
7 including YouTube?

8 MR. KRAMER: Objection to form.

9 THE WITNESS: So there's a couple of
10 points. These are stats, as I mentioned. We look
11 broadly to understand what's happening in the world
12 and make sure that we're proactively addressing
13 risks. That doesn't mean that these are issues on
14 YouTube. And second, YouTube is not a social media
15 app. We don't have a social graph. So I would not
16 put us in the bucket where there's social media
17 apps.

18 BY MS. HAILESELASSIE:

19 Q. Do you agree that one of the primary
20 purposes of YouTube is to create communities around
21 video?

22 MR. KRAMER: Objection to form.

23 THE WITNESS: Our mission at YouTube is to
24 give users a voice and show them the world. That's
25 our stated mission.

1 BY MS. HAILESELASSIE:

2 Q. Do you agree that a component of that
3 mission is building communities around video?

4 MR. KRAMER: Objection to form.

5 THE WITNESS: I can't speak to that.
6 That's something that I don't work on. I don't know
7 if we have a team that works on that. But that's
8 not what I work on.

9 BY MS. HAILESELASSIE:

10 Q. Okay. And users have the ability to like,
11 comment and subscribe on YouTube, correct?

12 MR. KRAMER: Objection to form.

13 THE WITNESS: They have the ability to
14 subscribe to channels, that's correct.

15 BY MS. HAILESELASSIE:

16 Q. And they have the ability to like videos,
17 right?

18 MR. KRAMER: Objection to form.

19 THE WITNESS: They have the ability to
20 like videos.

21 BY MS. HAILESELASSIE:

22 Q. And they have the ability to comment and
23 interact with other users through comments on
24 videos, correct?

25 MR. KRAMER: Objection to form.

1 THE WITNESS: It depends.

2 BY MS. HAILESELASSIE:

3 Q. And they have the opportunity to interact
4 with creators in a live video format, right?

5 MR. KRAMER: Objection to form.

6 THE WITNESS: It depends on -- on the
7 surface. So those areas are not areas that I work
8 on. I can't speak to all the protections, but I
9 know that we have a lot of limits on, for example,
10 our supervised experiences versus other -- versus
11 regular YouTube. But I can't speak to all the --
12 all the protections in place.

13 BY MS. HAILESELASSIE:

14 Q. So you don't know whether it's possible
15 for people to like, comment and subscribe on
16 YouTube?

17 MR. KRAMER: Objection to form.

18 THE WITNESS: Can you be more specific?
19 Which people?

20 BY MS. HAILESELASSIE:

21 Q. You don't know whether it's possible for
22 users to like and comment on videos?

23 MR. KRAMER: Objection to form.

24 THE WITNESS: But which users? Because it
25 depends on your age, and it depends on whether

1 you're supervised or not.

2 BY MS. HAILESELASSIE:

3 Q. You were saying that YouTube is not a
4 social media application.

5 But it does have these social factors
6 built into the fabric of its platform, does it not?

7 MR. KRAMER: Objection to form.

8 THE WITNESS: Well, from my point of view,
9 a social media -- what defines a social media
10 application is a social graph, which we do not have.

11 BY MS. HAILESELASSIE:

12 Q. There are social aspects to YouTube,
13 correct?

14 MR. KRAMER: Objection to form.

15 THE WITNESS: From my point of view, what
16 defines -- as I said earlier, what defines social
17 media application is a social graph. That's my
18 point of view.

19 BY MS. HAILESELASSIE:

20 Q. Okay. Exhibit 16, page 109, there is a
21 comment from you. (As read):

22 I like the strong problem
23 statement, however, I'm wondering
24 if it leans too much into mental
25 health on sadness and hopelessness

1 CERTIFICATE OF REPORTER

2 I, Kathleen A. Maltbie, Certified
 3 Shorthand Reporter licensed in the State of
 4 California, License No. 10068, the State of Nevada,
 5 CCR 995, and the State of Texas, CSR 12212, hereby
 6 certify that deponent was by me first duly sworn,
 7 and the foregoing testimony was reported by me and
 8 was thereafter transcribed with computer-aided
 9 transcription; that the foregoing is a full,
 10 complete, and true record of proceedings.

11 I further certify that I am not of counsel
 12 or attorney for either or any of the parties in the
 13 foregoing proceeding and caption named or in any way
 14 interested in the outcome of the cause in said
 15 caption.

16 The dismantling, unsealing, or unbinding
 17 of the original transcript will render the
 18 reporter's certificates null and void.

19 In witness whereof, I have hereunto set my
 20 hand this day:

21 _____ Reading and Signing was requested.

_____ Reading and Signing was waived

22 ___X___ R~~e~~ _____ uested.

23 *Kathleen A. Wilkins*

24 _____
 KATHLEEN A. MALTBIE

RPR-RMR-CRR-CCRR-CLR-CRC-RDR

25 California CSR 10068, Nevada CCR 995

Texas CSR 12212

AMENDED Exhibit 1001

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

Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA Case No. 4:22-MD-03047-
ADOLESCENT ADDICTION/ YGR MDL No. 3047
PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION MDL No. 3047

This Document Relates to:
ALL ACTIONS

30(B)(6)/PMQ FOR GOOGLE/YOU TUBE
VIDEOTAPED DEPOSITION OF ERIN TURNER
Wednesday, January 22, 2025
SAN FRANCISCO, CALIFORNIA

Reported By:

KATHLEEN A. MALTBIE, STENOGRAPHIC REPORTER
California CSR 10068, Nevada CCR 995, Texas CSR
12212, RPR-RMR-CRR-CCRR-CLR-CRC-RDR

Page 2

VIDEOTAPED DEPOSITION OF ERIN TURNER

BE IT REMEMBERED that on Wednesday,
January 22, 2025, commencing at the hour of
9:38 a.m. thereof, before me, Kathleen A. Maltbie,
RPR-RMR-CRR-CCRR-CLR-CRC-RDR, a Certified
Stenographic Shorthand Reporter, in and for the
State of California, Nevada and Texas, personally
appeared ERIN TURNER, a witness in the
above-entitled court and cause, who, being by me
first duly sworn, was thereupon examined as a
witness in said action.

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21 ALSO PRESENT:

22 Demarron Berkley, in-house counsel, YouTube and
23 Google
24 (Via Zoom Videoconference)
Marissa Urban, in-house counsel, YouTube
25 Product Counsel

1 is not in my area.

2 BY MS. HAILESELASSIE:

3 Q. You've never inquired of anyone why that's
4 the case?

5 A. No.

6 Q. Okay. I'll have marked now -- I believe
7 it's already been marked Exhibit 4.

8 (Whereupon, Deposition Exhibit 4
9 was marked for identification.)

10 BY MS. HAILESELASSIE:

11 Q. And I will represent to you that this is
12 an exhibit from another deposition that we did
13 earlier this year of -- Ms. Weikert -- who just
14 helped us identify the areas that you're going to
15 address with us. So you're welcome to look through
16 it, but it's mostly a list of names, programs,
17 features and groups within YouTube. So I'm just
18 directing you to the parts that are relevant to her
19 deposition.

20 So if you could look at page 9.

21 Do you see where it says, "Responsible
22 Content & Creators?"

23 MR. KRAMER: I'm going to object to the
24 characterization of the document.

25 But you can go ahead and look through.

1 THE WITNESS: What page is that on?

2 BY MS. HAILESELASSIE:

3 Q. This is page 9.

4 A. Page 9.

5 Okay.

6 Q. Okay. It lists a couple of things that
7 YouTube suggests we talk to you about, a teen
8 wellbeing classifier and age appropriate classifier.

9 Do you see that?

10 A. I see that, yes.

11 Q. Okay. And I'm just showing you that so
12 you understand what's guiding a lot of my
13 questioning today.

14 Do you understand?

15 A. Okay.

16 Q. So the Teen Wellbeing classifier, and then
17 in parentheses, it specifies Volume Impacts
18 Wellbeing.

19 Are you generally knowledgeable about that
20 product?

21 MR. KRAMER: Objection to form.

22 THE WITNESS: This is a product my team is
23 responsible for.

24 BY MS. HAILESELASSIE:

25 Q. Is it a product you're generally

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 A. The --

8 MR. KRAMER: Objection to form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16 BY MS. HAILESELASSIE:

17 Q. Okay. We'll probably come back to this.

18 If you'll just turn to the page 15. At
19 the top under "Digital Wellbeing Features," you were
20 listed along with the teen wellbeing features. I'm
21 just getting there myself. (As read):

22 Teen wellbeing classifier (to
23 reduce concentration of
24 non-violative content that is
25 potentially harmful to teens in

1 high volume.)

2 Do you see that?

3 A. Yes.

4 Q. Is that the same thing that we've just
5 looked at, VIBE?

6 A. Yes.

7 Q. And do you know what the 2022 in
8 parentheses refers to next to this classifier?

9 A. That refers to when this was -- this work
10 was launched.

11 Q. All right. I'm going to have marked
12 Exhibit 5 -- you can put that one to the side.
13 Thank you.

14 Okay. Actually, before we take a look at
15 5, does your work -- so your work extends to YouTube
16 Kids, correct?

17 A. Yes.

18 Q. And do you work on YouTube shorts?

19 A. My -- our signals are applied to YouTube
20 shorts.

21 (Whereupon, Deposition Exhibit 5
22 was marked for identification.)

23 BY MS. HAILESELASSIE:

24 Q. Okay. So taking a look at what has been
25 marked as Exhibit 5, this Bates -02480437 is an

1

1

1

10

1

11

11

15 Q. Okay. We can put this to the side. I'm
16 going to mark Exhibit 10.

17 (Whereupon, Deposition Exhibit 10
18 was marked for identification.)

19 BY MS. HAILESELASSIE:

20 Q. This is an email with the Bates
21 ending -02490539. And it is an email from
22 [REDACTED] to you, Ms. Turner.

23 Who is [REDACTED]?

24 A. [REDACTED] is a member of the new GAPP
25 team.

1 Q. What is the GAPP team?

2 A. Government affairs and public policy.

3 Q. This email is dated April 17th, 2023.
4 And what is the subject?

5 A. The subject says (as read):
6 [Just us] regarding
7 privileged -- Re: privileged KOF
8 pov: on biggest teen protection
9 needs.

10 Q. Okay. And if you will turn to -0540, do
11 you see your message to [REDACTED] starting this thread?

12 MR. KRAMER: Objection to the form.

13 BY MS. HAILESELASSIE:

14 Q. Is that the first email in the thread, or
15 email to [REDACTED]?

16 A. I'm just reading -- I'm just reading this
17 here.

18 I -- I can't really tell from this whether
19 this was the first email in that thread. But I
20 don't know -- yeah. I can't tell for sure if this
21 was -- if there was something before that.

22 Q. Okay. Well, I will represent to you, I
23 haven't removed anything from this document, and did
24 not -- did not see any others with earlier emails,
25 but I understand you're telling me that you can't

1 represent that that is the initial one in the
2 thread. But at least on this document, there is an
3 email on April 5th, 2023 at 9:55 p.m.

4 And you are writing to -- is it [REDACTED] and
5 [REDACTED]? Is that correct?

6 A. That's what it says here.

7 Q. Okay. Do you know who [REDACTED] is?

8 A. [REDACTED] is another member of the same team
9 [REDACTED] is on.

10 Q. And that's --

11 A. Government affairs and public policy.

12 Q. Okay. And your message starts off (as
13 read):

14 Privileged. [REDACTED], please
15 advise.

16 Do you see that?

17 A. I do.

18 Q. Who is [REDACTED], if you know?

19 A. That would have been [REDACTED], who is
20 one of the recipients on this email.

21 Q. Okay. And will you please read your
22 email?

23 A. (As read):

24 Privileged: [REDACTED], please

25 advise. Hi, [REDACTED], during

1 Q2 I am leading an xfn team (those
2 on cc) to pull together our
3 holistic teen wellbeing road map
4 and a go-to market plan for H2.
5 One thing we'd like to understand
6 from a KOF point of view is our
7 biggest opportunity areas. We have
8 a weekly working session with most
9 on this thread. Can you make time
10 to join us next week to share your
11 point of view on the top three to
12 five issues? We're looking for a
13 rough stack ranking.

14 Q. Okay. So what -- what is the information
15 you're trying to get from them?

16 A. We take a broad view in trying to
17 understand from our users what's happening with
18 their needs and also other stakeholders in the -- in
19 the marketplace. So, for example, keeping formers
20 and regulators so we can pull together a holistic
21 picture of what our user needs and risks might be.

22 Q. And KOF is key opinion formers?

23 A. That's correct.

24 Q. You mentioned regulators.

25 Are regulators key opinion formers?

1 A. That is a broad term that we use, but
2 typically they -- they could be.

3 Q. Who else would be a key opinion informer?

4 MR. KRAMER: Objection to the form.

5 THE WITNESS: That -- that is the term
6 that typically our government affairs team would
7 use. I don't know who else would fall into that
8 bucket.

9 BY MS. HAILESELASSIE:

10 Q. Would it include users of YouTube?

11 MR. KRAMER: Objection to the form.

12 THE WITNESS: Users are -- are our biggest
13 priority. We are very user centered in
14 understanding their needs, but we also like to
15 understand the landscape as a whole and what other
16 issues may be of impact to our users.

17 So regulators and how they are seeing the
18 needs of our users are an important data point for
19 us.

20 BY MS. HAILESELASSIE:

21 Q. Are users included in the term "key
22 opinion formers"?

23 MR. KRAMER: Objection to the form.

24 THE WITNESS: They are -- they are not.

25 / /

1 done. I don't know what other teams may have done.

2 BY MS. HAILESELASSIE:

3 Q. Okay. I'm marking Exhibit 17. I just
4 have a couple questions on this one.

5 (Whereupon, Deposition Exhibit 17
6 was marked for identification.)

7 BY MS. HAILESELASSIE:

8 Q. This is -- it's titled "Outline of [REDACTED]
9 promo." It has a Bates number of -02509749. And it
10 was produced by Google's attorneys from your
11 custodial file. You're the only custodian on it.
12 You are also the author.

13 Does this document have to do with your
14 subordinate, [REDACTED], promotion?

15 A. Yes, it does.

16 Q. And was this a report that you were
17 preparing in support of her promotion?

18 A. That's correct.

19 Q. Okay. I just want to come down to the
20 bottom of -9749.

21 Can you read Numbers 1 and 2 going over to
22 the top of -9750?

23 Can you read it aloud?

24 A. Sorry, you are asking me to read it?

25 Q. Yes, please.

1 A. (As read):

2 ██████████ is in the bull's-eye of
3 two of YouTube's biggest
4 challenges, and she has shown she's
5 more than capable of leading
6 multiple strategies -- multiyear
7 strategies and delivery end to end.
8 Number 1, supporting teen wellbeing
9 via content classifiers and
10 treatments, one of the biggest
11 concerns in society today among
12 parents, law makers and teens
13 themselves. Identifying what
14 content has the potential to
15 negatively impact some teens in
16 repetition required extensive
17 research with experts, thoughtful
18 template iteration and model score
19 reviews to avoid overreach, novel
20 metric approaches to define
21 concentration per recommendation
22 surface and to sample accordingly,
23 and had strong narratives to
24 executives who were skeptical when
25 this work was started, but

1 exceedingly happy it had already
2 been done when the regulatory tide
3 shifted abruptly this year.

4 Number 2, driving responsible
5 teen watch time growth. An
6 existential issue, YouTube is
7 losing ground to teens with TikTok
8 and other competitors. [REDACTED] was
9 asked to step in and develop a
10 strategy in Q1 when the year had
11 already started. She dove deep
12 into the user research and
13 recommendation system with her eng
14 partners to turn around a strong
15 set of pillars and treatments with
16 amazing speed. Through rapid
17 execution, the team delivered XX
18 launches, and she's worked hard --
19 within three quarters, she's worked
20 hard to refine and clarify the big
21 ideas.

22 Q. Thank you.

23 So does -- does this document refresh your
24 recollection as to YouTube's fierce competitiveness
25 with TikTok and other social media competitors?

1 MR. KRAMER: Objection to the form.

2 THE WITNESS: YouTube -- can you say more
3 about -- you said fierce competition.

4 BY MS. HAILESELASSIE:

5 Q. You said YouTube is losing ground with
6 teens to TikTok and other competitors, right?

7 And you said that responsible -- well, let
8 me just --

9 Right? You wrote that?

10 A. I -- I wrote that, correct.

11 Q. Okay. And driving responsible teen watch
12 time growth is an existential issue for YouTube,
13 right?

14 A. That's --

15 MR. KRAMER: Objection to form.

16 THE WITNESS: That is what this summary
17 says.

18 BY MS. HAILESELASSIE:

19 Q. Okay. And did you -- did you mean by that
20 that YouTube might one day cease to exist if it
21 cannot responsibly grow teen watch time?

22 MR. KRAMER: Objection to form.

23 THE WITNESS: I wouldn't agree with that
24 characterization. [REDACTED] was asked to look at how
25 content was relevant to this audience in an interim

1 basis, and came up with a strategy to do so as
2 related -- as stated here.

3 BY MS. HAILESELASSIE:

4 Q. Okay. But you -- you did write that
5 driving responsible teen watch time growth is an
6 existential issue and that YouTube is losing ground
7 with teens to TikTok and other competitors.

8 I want to -- I want to just go back up to
9 the -- let's talk about what's under that. So you
10 said she deep dove this, and then there was some
11 pushback -- sorry, that is up in paragraph 1, there
12 was some pushback from executives when this work was
13 started, right?

14 MR. KRAMER: Objection to the form.

15 THE WITNESS: When we start any new
16 project, we will often get questions on the work.
17 And so that's what I'm referring to. But that's
18 every single project that is new gets some
19 skepticism. And ultimately, that work was -- was
20 still approved and moved very quickly. So this is
21 speaking more to her ability to explain the need and
22 get approval to move forward with the work.

23 BY MS. HAILESELASSIE:

24 Q. Do you understand what was driving the
25 skepticism in this particular case?

1 MR. KRAMER: Objection to form.

2 THE WITNESS: As I mentioned, any new
3 project is going to have some skepticism because
4 it's committing -- whether -- whether it's
5 modernizing the app or working on responsibility,
6 it's something where there'll be new resources and
7 commitments. And so it's the job of my team or any
8 team to explain why this work should be an
9 investment.

10 BY MS. HAILESELASSIE:

11 Q. Do you recall which executives were
12 skeptical?

13 A. I don't recall.

14 Q. And what you expressed here is that those
15 skeptical executives were happy when the regulatory
16 tide shifted abruptly, right?

17 A. That's what I stated here.

18 Q. Okay. So I don't -- I don't think there's
19 anything you mentioned here about these executives
20 being happy with the product itself and the results
21 of the product.

22 It was just when the regulatory tide
23 shifted, right?

24 MR. KRAMER: Objection to the preamble.
25 Objection to the form of the question.

1 THE WITNESS: So this is not a
2 comprehensive summary of the response from
3 executives. We got quite a bit of support in
4 rapidly executing the project and on the fact that
5 it was launched. In a review like this, there is a
6 word limit, and so this is a highly summarized
7 snippet that doesn't provide the full context on the
8 support from executives for this project.

9 BY MS. HAILESELASSIE:

10 Q. Okay. I just want to have you go back to
11 Exhibit 16. Page 94, slide 94.

12 Begins "teen wellbeing is a huge problem."

13 Do you see the statistic 42 percent of
14 U.S. high school students said they felt
15 persistently sad or hopeless?

16 A. I'm just looking to catch up with you.
17 Which deck are we looking in?

18 Q. Exhibit 16, page -- slide 94.

19 Do you see that statistic?

20 A. I'm -- I'm looking for the same page.
21 Give me just a second here. Oh, yes.

22 Q. And do you see also the quote (as read):

23 Teen girls who persistently
24 felt sad or hopeless increased
25 dramatically from 2011 to 2021

1 jumping from 36 percent to
2 57 percent.

3 A. I see these stats.

4 Q. Okay. Do you understand that period from
5 2011 to 2021 to be a period during which there was
6 widespread adoption of social media applications,
7 including YouTube?

8 MR. KRAMER: Objection to form.

9 THE WITNESS: So there's a couple of
10 points. These are stats, as I mentioned. We look
11 broadly to understand what's happening in the world
12 and make sure that we're proactively addressing
13 risks. That doesn't mean that these are issues on
14 YouTube. And second, YouTube is not a social media
15 app. We don't have a social graph. So I would not
16 put us in the bucket where there's social media
17 apps.

18 BY MS. HAILESELASSIE:

19 Q. Do you agree that one of the primary
20 purposes of YouTube is to create communities around
21 video?

22 MR. KRAMER: Objection to form.

23 THE WITNESS: Our mission at YouTube is to
24 give users a voice and show them the world. That's
25 our stated mission.

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