

AMENDED Exhibit 1008

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



Part 1: SupeX Message Test Recap

Sample:

n=193 Total

- Parents in the US, UK, and India with children ages 8 - 12
 - US: n=67
 - India: n=82
 - UK: n=44

Privacy Language (for legal reference): ** In addition to signing an NDA upon joining the Point Panel, every respondent agreed to the following:

"Before moving on, we need to inform you that the information you will be reviewing today is not finalized and is strictly confidential. By continuing, you are agreeing that you will not disclose any information or content shown to you in the following questions."

Key Findings

"Supervised channel" vs. "private channel" understanding

In total, across the US, UK, and India, parents define the channel types as:

Supervised channel	Private channel
A channel where parents can prohibit content, limit screen-time use, and receive real-time alerts for unapproved use	A channel where children can post their own content, but only share and interact with a set of parent-approved contacts
• A myriad of parental controls to manage every part of an account • Access to full usage history with alerts for unauthorized searches/use	• Channel and videos would not be searchable • A code/password would be needed for others to view or interact with the account in anyway

- Some believe *supervised channels* and *private channels* to be very similar, though expect *supervised channels* require more parent involvement

"In my opinion, a supervised channel for pre-teens would probably offer less freedom and control for the child creator as compared to the private channel. With this channel structure, parents have a more hands-on role with their child's involvement in the channel." - US Parent, SupeX non-Aware

"In terms of differentiating the two, I'd say the private channel offers the child more freedom and only gives parents a delayed oversight, whereas the supervised channel gives...more real-time and guided oversight of their child's activities." - US Parent, SupeX User

- Few parents suggest providing more descriptive names, as it is not abundantly clear what 'supervised' and 'private' refer to in this context.
 - Distinct names with connections to YouTube, may prompt more parents to set-up SupeX accounts for their children

"Supervised channel and private channel should have a unique name like YouTube Kids so that lots of parents will enroll." – India, SupeX Aware

"I am guessing about the meanings as they are not intuitive names." – US, SupeX non-aware

Detailed Findings

Supervised channels

Majority of parents in the US, UK, and India define Supervised Channels the same way: a channel where parents can prohibit content types, set time limits, and view detailed usage reports for their pre-teens

Expectations Include:

- More hands-on approach – setting up desired parental controls, selecting approved content types, monitoring access
- Detailed Usage Reports – video watch history, likes/comments/subscription details, time use
- Alerts for Unapproved use – i.e. exceeding time limits, inappropriate searches

"A supervised channel might request setup from the parents. I think it will alert the parent if access to non-approved content have been accessed." – US parent, SupeX Non-aware

"This account helps parents to select a content setting which limits the videos and music that children under 13 can find. Parents can choose to change the features." – UK Parent, SupeX Non-aware

"It has a feature like where parents can select a content setting that limits the videos and music where children can find and play" – India Parent, SupeX User

Few parents expect a Supervised Channel to be automatically filtered for age-appropriate content—similar to YouTube Kids, but for pre-teens.

"It would have a content moderator responsible for vetting all videos as well as the discussion in the comments." –US Parent, SupeX Non-aware

"A channel which is under the supervision of YouTube and it ensures that the platform is free from harmful content that can create a bad effect on kid." – India Parent, SupeX Aware

Private channels

Most parents in the US and UK, and India understand Private Channels as: a channel where pre-teens can share and post their own content but visibility is limited to a parent-approved audience

Expectations Include:

- Parent must approve subscribers and/or viewer lists
- Unique codes are required to view content
- Neither channel nor videos appear in public searches

"I assume, since the minimum age that kids are supposed to be able to have a YouTube account is 13, that a "private channel" would be a way for kids under 13 to have their own channel that no one else can see, unless they are invited." – US Parent, SupeX user

"I guess this would be a channel that children can have to upload their own videos, but it would be only visible to people who have a special link." – US Parent, SupeX non-aware

"I think a private channel is the group where our kids can create video and share it privately only with their friends or family members." - India Parent, SupeX user

Parent Sentiments

Interest in both Supervised and Private Channels is high across all three markets with parents expressing desires to set-up such channels for their pre-teens, or even similar accounts for teens

- Private Channels solve a need few have experienced first-hand, the desire to encourage their children's creativity while still protecting them online

"I would have loved this back when my son was going through his "I want to be a YouTube star" phase. He easily found his way around the age restrictions and tried to make his own channel. Luckily, it never really got off the ground, mostly because I would constantly go in and mark his videos as private. Having something like this would have been a good way for him to express his creativity, without having to worry about the seedier side of the internet." – US Parent, SupeX non-aware

- While interest is high for both channel types, few parents (particularly in the UK) are skeptical on the execution of such ideas, fearing online predators would be able to home in on these channel types specifically

"I would still think this might be a beacon for undesirable people to gain access to these apps/channels to be able to get access to the younger audience. I'm not too sure how this could be stopped?" - UK Parent, SupeX non-aware

APPENDIX: Research questionnaire

[RANDOMIZE ORDER OF Q1 AND Q2]

1. **[Open end: Supervised channel]** YouTube is considering offering “**supervised channels**” for kids under 13 (with parental permission). What do you think a “**supervised channel**” is?
 - What do you expect from a supervised channel?
 - What features would it have?
2. **[Open end: Private channel]** YouTube is considering offering a “**private channel**” for kids under 13 (with parental permission). What do you think a “**private channel**” is?
 - What do you expect from a private channel?
 - What features would it have?

[OPTIONAL QUESTION]

- a. You may add any additional thoughts about “supervised channels” and/or “private channels” here.