

AMENDED Exhibit 1012

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

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1 VIDEOPHOTOGRAPHER: Good morning.
2 We are now on the record. My name is
3 Darnell Brown. I'm the videographer
4 with Golkow.

5 Today's date is April 24, 2015
6 {sic}, and the time is now 9:05 a.m.

7 This video deposition is being
8 held in Palo Alto, California, in the
9 matter of Social Media Adolescent
10 Addiction, for United States District
11 Court, for the Northern District of
12 California.

13 The deponent is Neal Mohan.

14 Counsel will be noted on the
15 stenographic record.

16 The court reporter is Carrie
17 Campbell, CSR number 13921, and will
18 now swear in the witness.

19
20 NEAL MOHAN,
21 of lawful age, having been first duly sworn
22 to tell the truth, the whole truth and
23 nothing but the truth, deposes and says on
24 behalf of the Plaintiffs, as follows:
25

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1 DIRECT EXAMINATION

2 QUESTIONS BY MS. CONROY:

3 Q. Good morning, Mr. Mohan.

4 A. Good morning.

5 Q. I introduced myself earlier.

6 My name is Jayne Conroy, and I represent the
7 plaintiffs in this case.

8 We also have some folks that
9 are on the Zoom screen, and their names are
10 going to be on the record so you'll know
11 who's here.

12 And we also have a few
13 exhibits, just so that there's warning to
14 everyone, that have a competitor protective
15 order status. And so when those are coming
16 up, we will take a break or stop the
17 deposition and do something so that we can
18 put others who do not represent YouTube or
19 are not involved directly with YouTube to go
20 into a breakout room.

21 Okay?

22 Nothing you need to worry
23 about, just to let that -- so that people
24 don't get nervous online.

25 A. Thank you.

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1 Q. Have you ever been deposed
2 before?

3 A. I have, yes.

4 Q. Okay. On how many occasions?

5 A. I would say about two or three
6 occasions, yes.

7 Q. Okay. And were they in-person
8 depositions?

9 A. They were -- they were like
10 this. I think one maybe might have been on
11 video, but they were -- they were generally
12 like this, this type of a room.

13 Q. Okay. So you sort -- you know
14 the ground rules pretty much?

15 A. I do. I think -- I mean,
16 unless there's anything else specific you'd
17 want to share.

18 Q. No, Ms. Campbell is going to
19 keep track --

20 A. Okay.

21 Q. -- of us when we talk over each
22 other, so that's the worst thing we can do.

23 A. Okay.

24 Q. Have you ever testified before
25 Congress before?

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1 on LinkedIn.

2 A. Sure. Oh, it's right here.

3 Q. Yes. You're free to look at it
4 either on the screen or hardcopy, whatever is
5 easiest for you.

6 A. Okay.

7 Q. And we'll mark this as
8 Exhibit 1.

9 And this goes through -- did
10 you develop -- did you create this profile?

11 A. I did, yes.

12 Q. Okay. And if we go back to the
13 beginning, it starts with your education and
14 then Accenture, DoubleClick, and then you
15 begin at Google in March of 2008.

16 Do you see that?

17 A. I do see that, yes.

18 Q. Okay. SVP, is that vice
19 president of sales?

20 A. No, that's senior vice
21 president. That was my -- what I was
22 ultimately promoted up into during my time at
23 Google.

24 Q. Okay. And could you describe
25 for me what display and video ads, what that

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1 encompassed or what your responsibilities as
2 senior vice president for display and video
3 ads --

4 A. Sure.

5 Q. -- was all about?

6 A. So display and video ads are
7 basically the image ads and video ads that
8 you would see on, really, websites across the
9 internet. And so, you know, on the -- on the
10 page of The New York Times or Wall Street
11 Journal or what have you, those were called
12 display ads.

13 And video ads, of course, are
14 the, you know, kind of video, instream ads
15 that would run on websites like YouTube or
16 CNN or kind of where they have video.

17 And my job was product
18 management for those, so building the
19 products that our advertiser and publisher
20 clients would use to run their businesses.
21 And so I did that for a number of years. And
22 that's basically what display and video ads
23 are.

24 Q. Okay. And for approximately
25 how long were you senior vice president at

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1 Google?

2 A. I was -- oh, let's see. When
3 was I -- this is a long time ago now.

4 So I was promoted to senior
5 vice president maybe -- I think maybe 2014,
6 maybe 2015, something like that, and by then
7 I moved over to YouTube shortly -- shortly
8 after that.

9 And I'm technically -- I'll
10 continue to be a senior vice president at
11 Google.

12 Q. I see.

13 So even though you're CEO of
14 YouTube, you're also a senior vice president
15 at --

16 A. Yeah --

17 Q. -- Google?

18 A. -- YouTube is kind of like a --

19 MR. PETROSINELLI: Let her
20 finish the question before you answer.

21 THE WITNESS: Yeah. Sorry.

22 Yes.

23 QUESTIONS BY MS. CONROY:

24 Q. There, we just did it. See?

25 But it wasn't -- it wasn't Ms. Campbell

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1 that --

2 A. I apologize for that.

3 MR. PETROSINELLI: That was her
4 fault. Don't worry about it.

5 THE WITNESS: I'm sorry. I'm
6 sorry. Your question was?

7 QUESTIONS BY MS. CONROY:

8 Q. So let me ask you. So even
9 though you are a CEO of YouTube, you are --
10 also remain senior vice president at Google?

11 A. Correct.

12 Q. Okay. And has your e-mail
13 remained the same the entire time you've been
14 at Google?

15 A. Yes.

16 Q. And that's -- what is your
17 e-mail?

18 A. My e-mail is [REDACTED].

19 Q. Are there any YouTube e-mails?

20 A. I do have a YouTube e-mail
21 address. I guess technically it's
22 [REDACTED]. They all go to the same
23 place.

24 Q. Okay. Can you describe for me
25 your move -- I'm going to call it a move.

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1 I'm not sure what it really was -- from
2 Google to YouTube?

3 A. So I moved over from Google to
4 YouTube towards the end of 2015, and I moved
5 in the capacity as chief product officer. So
6 my responsibility at YouTube was really
7 building our products for our -- for our
8 viewers, our consumers, also for our
9 creators, the content creators, that upload
10 their video content to YouTube.

11 And so that's -- those are the
12 areas that I looked after. Trust and safety
13 was a part of that as well.

14 Q. Had you had any
15 responsibilities with respect to YouTube
16 before your move in 2015?

17 A. Yeah. So I didn't have formal
18 responsibilities over the products as I
19 described, but in my capacity leading our
20 display and video ads business, I was
21 responsible for the advertising that was on
22 YouTube.

23 So I did work with YouTube in
24 the capacity of building advertiser products
25 that, you know, resulted in the ads that ran

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1 VIDEOGRAPHER: Yep, looks good.

2 I closed the rooms.

3 (YouTube-Mohan Exhibit 7 marked
4 for identification.)

5 QUESTIONS BY MS. CONROY:

6 Q. Okay. We'll mark as the next
7 exhibit, 7, a document with the
8 Bates 04703742 through 46.

9 You're free to look at this.
10 I'm only going to be asking you about -- a
11 little bit about the first page.

12 A. Okay.

13 Q. This is a document that says,
14 "Global age inference model 2023, YouTube
15 only." And the author is [REDACTED]
16 [REDACTED], and it's dated October 21, 2022.

17 A. Yes, and I will have to read it
18 here because it's also in tiny font.

19 Q. Do you know [REDACTED] [REDACTED]?

20 A. I do, yes. She's a product
21 manager.

22 Q. Okay. And is she at YouTube?

23 A. I believe she is still at
24 YouTube.

25 Q. And if you just take a look at

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1 the very top, Background, it says, "Youth is
2 a key YouTube initiative in 2023, and
3 responsibly growing the youth segment is a
4 top priority for YouTube across multiple
5 product strategies."

6 Do you see that on the screen?

7 A. I do see that, yes.

8 Q. Okay. And then I'm going to be
9 looking at number 1, which says, "Youth North
10 Star."

11 Okay?

12 A. Okay.

13 Q. It says, "Declared age has a
14 low recall but high precision for under 18."

15 Do you see that?

16 A. "Declared age" -- okay. Yes.

17 Q. And helpfully, it goes on to
18 explain exactly what that means.

19 "Meaning those who say they are
20 under 18 are likely to be under 18, but only
21 a small fraction of those who are actually
22 under 18 are declaring accurately."

23 Do you see that?

24 A. I do see that, yes.

25 Q. "To set a higher bar for

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1 safety, we'd like to expand our protections,
2 globally, to users that could be minors,
3 independent of their declared age."

4 Do you see that?

5 A. Uh-huh, yes.

6 Q. And is that -- so that's
7 something that [REDACTED] was working on as a
8 product manager at YouTube?

9 MR. PETROSINELLI: Object to
10 the form.

11 THE WITNESS: I don't remember
12 exactly what [REDACTED] was working on. She
13 may have been working on this effort
14 in conjunction with many other people.
15 I'm trying to remember what team she
16 was actually on.

17 I don't think she was the
18 person solely responsible for that,
19 but she might have been one of the
20 people who was involved. I think she
21 was on our -- maybe on our identity
22 teams but not on the youth team.

23 So I don't remember exactly
24 what she was working on.

25

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1 QUESTIONS BY MS. CONROY:

2 Q. Okay.

3 A. But I do -- so, yes, that's
4 what I'd say about [REDACTED].

5 Q. Okay. Do you recall ever
6 hearing about this, that only a small
7 fraction of those who are actually under 18
8 are declaring accurately?

9 MR. PETROSINELLI: Object to
10 the form.

11 THE WITNESS: I don't remember
12 hearing about this exactly, and,
13 again, I don't have the context on
14 this document or who [REDACTED] wrote this
15 with or where she got this data.

16 I do remember kind of the
17 general kind of gist of this, which
18 is, as the statement says, we believe
19 that that declared signal for people
20 who say they're under 18 to be very
21 high quality signal, obviously.
22 They're declaring that.

23 And as I said, it -- sometimes
24 it's in conjunction between the child
25 and the parent, and lots of households

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1 manage it that way. So in that sense
2 it sort of explains why we started
3 there, because it was a very high
4 quality signal and remains a very high
5 quality signal.

6 And -- but of course this is
7 saying that we couldn't -- we wanted
8 to expand on that, part of it because
9 we obviously wanted to comply with the
10 law in Europe and in the UK, as we
11 just discussed earlier, but also
12 because I think it was a capability
13 that we wanted to understand more
14 broadly and get higher quality on to
15 sort of build those sort of multiple
16 rings of defense or -- that I was
17 describing.

18 And also, if this was an
19 accurate signal, then there were --
20 there would be product capabilities
21 that we could have.

22 I mean, as I said, lots of
23 young people use YouTube as a, you
24 know, learning platform, as a platform
25 to connect, and so how would we -- how

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1 would we enable all of those.

2 So that general concept I do
3 recall through our efforts.

4 QUESTIONS BY MS. CONROY:

5 Q. So it's -- what you're saying
6 is, it is a high-quality signal when someone
7 declares that they are under 18.

8 Correct?

9 A. That's what this is referring
10 to, yes. That's what this is saying.

11 And I generally believe that to
12 be the case because of kind of what I was
13 describing, which is, like, yes, the child
14 might be under 18, the minor might do it on
15 his or her own, but oftentimes what we found
16 is it was something that they did in
17 conjunction with their parents or their
18 caregivers. And so in that sense, it was --
19 it was an accurate signal.

20 Q. But --

21 A. Kind of accurate, positive
22 signal.

23 Q. Right.

24 But at least as [REDACTED] [REDACTED]
25 found, it was certainly not high quality if

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1 only a small fraction of those who are
2 actually under 18 declare themselves to be
3 under 18?

4 MR. PETROSINELLI: Object to
5 the form.

6 QUESTIONS BY MS. CONROY:

7 Q. That's a different problem,
8 right?

9 MR. PETROSINELLI: Object to
10 the form.

11 THE WITNESS: It's a -- again,
12 it's one aspect of this, which is,
13 like, is there a particular use case
14 we can go after with the declared age,
15 yes.

16 You know, this use case that
17 I'm describing here in conjunction
18 with parents, minors declaring it
19 themselves, does that cover
20 everything?

21 It doesn't cover the case of
22 minors not being truthful or, you
23 know, circumventing what their parents
24 might ask them to do. Just like, you
25 know, back in the cave, kids would

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1 take the car keys kind of a thing,
2 right?

3 That -- that's -- so this is, I
4 think, alluding to that particular
5 aspect of that -- of that use case.

6 QUESTIONS BY MS. CONROY:

7 Q. And then if you go to the very
8 bottom of the first page, she goes on and
9 says, "We either need to design around that
10 or partner more closely with the Google teams
11 driving" --

12 A. You have to highlight where
13 you're reading.

14 Q. Oh, I'm sorry. Going too fast.
15 It might be easier to look up here.

16 MR. PETROSINELLI: It's right
17 here.

18 THE WITNESS: Yeah, okay. Got
19 it.

20 QUESTIONS BY MS. CONROY:

21 Q. And I'll start -- you can take
22 a look at it. It says, "As shown above" --

23 A. Uh-huh.

24 Q. -- [REDACTED] [REDACTED] [REDACTED]
25 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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1

2

3

Does that sound right to you?

4

A. Yes. I think this is kind of

5

alluding to that previous conversation about

6

who develops the capabilities, where the

7

experts are, around all of those Google

8

account signals.

9

So, yes, that first sentence, I

10

think, is a reflection of what we were

11

talking about on that other document as well.

12

Q. And then she goes on and says,

13

"We either need to design around that or

14

partner more closely with the Google teams

15

driving this work stream to determine

16

together how to drive faster improvements in

17

this space."

18

Do you see that?

19

A. Yes, I see that.

20

Q. Is that any -- is that anything

21

you have been involved in as CEO of YouTube,

22

to see if you could drive faster improvements

23

in this space or getting the Google teams to

24

work together with the YouTube teams?

25

MR. PETROSINELLI: Object to

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1 the form.

2 THE WITNESS: Yeah, I think so.

3 And, you know, the very -- the
4 first sentence of this paragraph sort
5 of, I think, gives the context of it,
6 which is, like -- you know, it was
7 this recognition that this kind of
8 inference capability wasn't ready to
9 be globalized for quality reasons or,
10 you know, underlying sort of ground
11 truth reasons.

12 So is that a concept that we
13 potentially were consider -- would
14 want to consider adding to kind of the
15 arsenal of safety measures that we
16 have? Yes, that's what this is.

17 I mean, as [REDACTED] at least in
18 her opinion, is highlighting here, the
19 inference capabilities were not ready
20 from a product quality standpoint to
21 be globalized.

22 And so did we want to do work
23 to move that effort along? If that's
24 what this is referring to, then I
25 think the answer there would be --

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1 would be yes.

2 Because it does take time. It
3 oftentimes takes years to actually
4 build the technology, build the ground
5 truth, build the quality of these
6 models.

7 As I said, you know, even to
8 this year, even to this day, we have
9 expressed the desire to do it, but,
10 you know, it's not a guarantee. Like
11 we have work to do to actually get
12 there in terms of precision recall.

13 MR. PETROSINELLI: You want to
14 take a break? It's about an hour
15 anyway, so let's --

16 MS. CONROY: Okay. Let's do
17 that, and we'll get ourselves set up
18 and tell folks -- when we come back,
19 we'll tell people.

20 VIDEOGRAPHER: The time is now
21 11:16. Going off the record.

22 (Off the record at 11:16 a.m.)

23 VIDEOGRAPHER: The time is now
24 11:30. Back on the record.

25

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1 blog alludes to a couple of them, like Common
2 Sense Media, which is a very well-respected
3 child development, well-being organization
4 that we've partnered with for a numbers of
5 years.

6 And I can't recall if they
7 actually communicated this, including some of
8 the limitations, of course. None of these --
9 you know, all of these products are sort of
10 meant to be this kind of multiple layers of
11 defense as opposed to a standalone thing.

12 So the blog, again, was one of
13 those -- it was just in -- in the context of
14 a number of different touch points around
15 communicating how our products work or...

16 Q. At this point in time, inferred
17 age is being used in the EU.

18 Correct?

19 A. Sorry. The -- in 2023,
20 inferred age was being used, again, you know,
21 in accordance with the law.

22 Q. Okay. And so if there are
23 tools for teens that are available to users,
24 those would be available to teens that are
25 declared under 18 as well as those who are

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1 inferred to be under 18.

2 Correct?

3 MR. PETROSINELLI: Object to
4 the form.

5 THE WITNESS: Well, I think as
6 this blog points out, that wasn't --
7 that wasn't quite the case.

8 So, for example, there's
9 features in here that we rolled out in
10 the US first before we rolled them out
11 in Europe. So we, of course, want to
12 get our capabilities and our products
13 and features, in this case including
14 this recommendation dispersion
15 product, all -- to all of our users as
16 globally as possible, but again, some
17 of this is a limitation of technology
18 and resources that we have to roll out
19 features.

20 So in this particular case, we
21 did make it available to young people
22 in the US before we made it available
23 to users in other parts of the world.
24 So that was a difference.

25 And so -- but that was a

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1 limitation of the technology. Because
2 the way that this recommendation
3 classifier works is [REDACTED] [REDACTED]

A 10x10 grid of black squares on a white background. A vertical line is positioned to the left of the grid. The grid contains black squares in the following rows (from top to bottom):

- Row 1: Columns 1, 3, 4, 5, 6, 7, 8, 9
- Row 2: Columns 3, 4, 5, 6, 7, 8, 9
- Row 3: Columns 1, 3, 4, 5, 6, 7, 8, 9
- Row 4: Columns 1, 3, 4, 5, 6, 7, 8, 9
- Row 5: Columns 1, 3, 4, 5, 6, 7, 8, 9
- Row 6: Columns 1, 3, 4, 5, 6, 7, 8, 9
- Row 7: Columns 1, 3, 4, 5, 6, 7, 8, 9
- Row 8: Columns 1, 3, 4, 5, 6, 7, 8, 9
- Row 9: Columns 1, 3, 4, 5, 6, 7, 8, 9
- Row 10: Columns 1, 3, 4, 5, 6, 7, 8, 9

15 And so it's correct that it
16 wasn't available in Europe
17 immediately, but we have tried to make
18 it so that available -- that it will
19 be available for our European users.
20 And I think we followed up on that
21 subsequently to make it available for
22 it.

23 So that's the nature of the
24 product development, just like as I
25 was saying about inference, which is,

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1 we rolled it out in accordance with
2 the law in Europe.

3 But of course it was -- it was
4 a good product, but it wasn't at the
5 level from a precision recall
6 standpoint where, if it wasn't for the
7 law, that it would be, you know, a
8 globally applicable product.

9 So, you know, products and
10 features, ultimately we want them to
11 be global and available everywhere,
12 but sometimes they start in a
13 particular region or a particular
14 country and sort of grow from there,
15 just like this particular feature did.

16 QUESTIONS BY MS. CONROY:

17 Q. The well-being tools are now
18 available in the UK.

19 Correct?

20 A. The well-being, Take a Break,
21 Bedtime reminders, are available. This
22 dispersion is available.

23 I couldn't tell you every
24 single language/country pair where it's
25 available because, again, these classifiers

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1 have to get built, trained on ground truth
2 and usage patterns for each country, language
3 pair.

4 So -- but I do believe that
5 that -- that dispersion is available in
6 the -- in the UK.

7 Q. And so under 18 users, whether
8 they have declared themselves to be under 18
9 or not, in the UK would receive -- the
10 classifier would work for them.

11 Correct?

12 MR. PETROSINELLI: Object to
13 the form.

14 THE WITNESS: Again, I can't
15 remember exactly when we rolled that
16 out. In my -- so I'm not sure how
17 many years subsequent to this
18 announcement we rolled it out in the
19 UK.

20 But I believe -- in fact, I
21 think we did it relatively recently,
22 if I'm not mistaken. So it might be a
23 brand new thing.

24 QUESTIONS BY MS. CONROY:

25 Q. So in the UK, you are using the

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1 inferred age for the application of the --
2 I'm going to call it the classifier or the
3 repeat video issue?

4 MR. PETROSINELLI: Object to
5 the form.

6 THE WITNESS: Yes, I just -- I
7 can't -- I unfortunately can't tell
8 you exactly when. I believe it was
9 relatively recent, but -- and again,
10 for those same reasons that I was
11 mentioning, which is, we want to get
12 these classifiers to a -- to a level
13 that we feel comfortable that we can
14 layer on top of our recommendations.

15 Now, of course, just because it
16 wasn't available in the UK at the same
17 time it was available in the US
18 doesn't mean that we didn't have other
19 safeguards in place in all of these
20 other places. It was of course built
21 on top of our existing recommendation
22 architecture, all of the safety
23 standards that we have in
24 recommendations.

25 You know, the recommendations

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1 feature is ultimately they're
2 recommending content. And all of the
3 content on YouTube, of course, is
4 subject to all of our community
5 guidelines and how they work in terms
6 of what's allowed, what's not allowed.

7 And so all of that, all of
8 those safeguards, apply globally. And
9 so that was whether you're a UK user,
10 a US user.

11 Now, this concept of sort of
12 dispersing repeated content is
13 something that we started in the US,
14 but we want to fast-follow now that we
15 feel like we have a -- you know, a
16 product. And our child development
17 experts speak very highly of this
18 capability, and so I'd like to roll it
19 out globally as quickly as possible.
20 It's a feature that we're very proud
21 of.

22 QUESTIONS BY MS. CONROY:

23 Q. But it's still not available to
24 under 18 users who are declared as older than
25 18 in the United States?

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1 MR. PETROSINELLI: Object to
2 the form.

3 THE WITNESS: Sorry. So it is
4 available -- it is for under 18 users.

5 In the US, we have this effort
6 now to bring a lot of that inference
7 technology that we've sort of refined
8 and honed after years in Europe to the
9 US, if that's your question.

10 And this capability was started
11 in the US, is not globally everywhere.
12 We'd like for it to be globally
13 everywhere.

14 So it's kind of like these two
15 things are crossing, but of course
16 it's all part of our ultimately
17 getting to a global usage, as I
18 articulated, in terms of our kind of
19 all-children principle.

20 QUESTIONS BY MS. CONROY:

21 Q. Right.

22 But as of 2023, and as of April
23 of 2025, this is not available to someone
24 under 18 in the United States who has
25 declared their age to be over 18 because the

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1 inference model is not yet active in the US.

2 Correct?

3 MR. PETROSINELLI: Object to
4 the form.

5 THE WITNESS: Correct. We do
6 not have the inference model here in
7 the US for the reasons I highlighted
8 before, which is, you know, we rolled
9 it out in accordance with the law in
10 Europe.

11 It has gotten dramatically
12 better. I think it has gotten to the
13 point where I -- we feel comfortable,
14 or at least I feel comfortable,
15 stating our intention of rolling it
16 out here in the US.

17 But we have work to do to get
18 it to roll out. I want it to be a
19 very high quality classifier before we
20 roll it out because of all those costs
21 that I talked about in terms of false
22 positives and false negatives. So
23 that is work that's underway today.

24 QUESTIONS BY MS. CONROY:

25 Q. Do you know if any of the

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 IN RE: SOCIAL MEDIA)
4 ADOLESCENT ADDICTION/PERSONAL)
5 INJURY PRODUCTS LIABILITY) MDL No. 3047
6 LITIGATION)
7 -----)
8 THIS DOCUMENT RELATES TO:)
9 ALL ACTIONS)

10 -----
11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF LOS ANGELES
13 UNLIMITED JURISDICTION

14 COORDINATION PROCEEDING) Lead Case No.
15 SPECIAL TITLE [RULE 3.550]) 22STCV21355
16)
17 SOCIAL MEDIA CASES) JCCP No. 5225
18)
19 -----)
20 THIS DOCUMENT RELATES TO:) Judge:
21 ALL ACTIONS) Carolyn B.
22) Kuhl, Dept.12

23 THURSDAY, APRIL 24, 2025
24 CONFIDENTIAL - ATTORNEYS' EYES ONLY -
25 PURSUANT TO PROTECTIVE ORDER

- - -

16 Videotaped deposition of Neal
17 Mohan, held at the offices of Wilson Sonsini
18 Goodrich & Rosati, 650 Page Mill Road, Palo
19 Alto, California, commencing at 9:05 a.m.
20 Pacific Time, on the above date, before
21 Carrie A. Campbell, Registered Diplomate
22 Reporter, Certified Realtime Reporter,
23 Illinois, California & Texas Certified
24 Shorthand Reporter, Missouri, Kansas,
25 Louisiana & New Jersey Certified Court
Reporter.

- - -

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1 MR. PETROSINELLI: You got --

2 THE WITNESS: Sorry. Yes, I

3 do.

4 QUESTIONS BY MS. CONROY:

5 Q. And that is active in the
6 United States as well, correct, that
7 teen-supervised account?

8 A. The teen-supervised account,
9 but I think you're referring to the Family
10 Center here.

11 Q. Well, I believe in the UK it's
12 called -- or in Europe it's called Family
13 Center, but in the US it's called teen
14 supervision?

15 A. If -- I believe it's called
16 Family Center in -- they're two separate
17 things.

18 Q. Okay.

19 A. There's the supervised
20 experiences, and then there's this Family
21 Center, which, within a couple of taps, if
22 you open up the YouTube app, you can get to,
23 and it basically shows you what it's -- what
24 it's describing here.

25 Q. It shows you the number of

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1 up -- your teen's uploads, subscriptions and
2 comments?

3 A. Yes. That's the design.

4 Q. And is that true in the US as
5 well?

6 A. Yes.

7 Q. And it's called Family Center
8 in the US?

9 A. Yeah. We spell it differently
10 here, but...

11 Q. All right. Just one of those
12 little --

13 A. Yeah.

14 Q. -- complicating things.

15 It would not, however, inform a
16 parent of a teenager if the teenager had
17 inaccurately declared their age.

18 Correct?

19 A. Well, this is -- this is
20 describing something a little bit different.
21 So let me just clarify here, which is, this
22 is a new feature, which is actually being
23 able to link together two accounts. And so
24 this is really just based on two accounts
25 wanting to be linked together, and I believe

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1 it actually works independent of age. I'll
2 have to confirm that.

3 But the idea here is to --
4 again, this is input that we got from our
5 child development experts -- is to really --
6 especially for teenaged users, is to strike
7 the balance between actually giving them some
8 agency and autonomy and freedom and parental
9 control.

10 So this feature describes
11 basically a parent being able to go into
12 Family Center or -- I think it here also is a
13 link. It might actually take you to the help
14 center. I'm not sure where this blog links
15 to.

16 But then you get an invitation
17 that goes to the account of the child, the
18 teen in this case, and those two accounts can
19 then be linked. And when those two accounts
20 are linked, then you see all of these types
21 of things.

22 And so it's not dependent on
23 that sort of criteria that you're describing.
24 It's like back to the point that I was
25 making, which is, in addition to, you know,

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1 those sort of 10, 12 different other
2 safeguards that I was describing, including
3 some of them highlighted here, we built yet
4 another capability, which is parents and
5 sitting down with their children, saying,
6 hey, I'm comfortable with you using YouTube.
7 I would love to have this type of a link.

8 As you can see, it gives the
9 linking account access to some information,
10 particularly the information that child
11 development experts told us that are -- that
12 is most important. And when there's sort of
13 that voluntarily linking happening, then this
14 is what's made available.

15 So it's a bit of a different
16 feature than sort of, like, something that's
17 turned off or on by default, depending on the
18 age, just to describe it.

19 Q. Does this -- it says that it
20 shows something, including the number of
21 uploads.

22 Does it identify the uploads?

23 A. It does not identify the
24 uploads in this case, but it will also -- it
25 does what you -- if you continue to read that

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1 paragraph, it does something that at least
2 the experts told us was the more important
3 piece, which is actually the notification at
4 the moment of upload.

5 And this is actually a really
6 good example of what I was describing before,
7 which is, it's important to have multiple
8 safeguards in place as opposed to just
9 anchoring on sort of this 18-plus sort of
10 boundary, what content versus not, because
11 what the -- what child development experts
12 have told us is actually the more important
13 pieces are around the creation and the upload
14 piece and the sharing piece and the
15 commenting piece.

16 And so we wanted to design
17 something that actually addressed that
18 particular use case because it might turn out
19 that parents are very comfortable with using
20 YouTube. You know, it's a learning
21 application. You know, 90 percent-plus of
22 teachers use it in the classroom every single
23 day.

24 And so we didn't want to
25 restrict that sort of really positive use

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1 case of YouTube at the -- but wanted to make
2 it -- make it having a feature that actually
3 addressed the things that some subset of
4 parents may particularly be concerned about,
5 which is uploading content, posting, et
6 cetera.

7 And so that's where this sort
8 of, like, Family Center account linking piece
9 came in. Because the idea was, give teens
10 the ability to explore, develop new
11 interests, learn new things, but also give
12 parents some insight into behavior that they
13 might deem to be areas that they might want
14 to check in on more.

15 And so as this highlights here,
16 this was something that was done not just in
17 partnership with our advisory council
18 experts, but was also with, you know, pretty
19 well-respected, highly regarded, child
20 development experts like common sense
21 networks, Common Sense Media, et cetera.

22 So, then, you know, this is
23 another feature that, you know, I'm very
24 proud of that we sort of layered on top of
25 it, because it is one of those things that we

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1 were told facilitates that conversation
2 between parents and their teens, just like
3 parents and teens have conversations around,
4 you know, when to get your driver's license
5 and all of those other things that teens, you
6 know, go through as rites of passage.

7 Q. Do you recall if it was ever
8 discussed whether to add watch time into what
9 is a shared insight?

10 A. I can't remember exactly what
11 set of features were discussed or not, but I
12 do remember this general concept of actually
13 having the features address those types of
14 things that were most important to parents
15 and what the experts sort of called out and
16 sort of layering on those things from there.
17 Because we had things on the watch time side
18 like the Take a Breaks, et cetera, and this
19 particular thing was trying to get at sort of
20 threading that needle in terms of what -- you
21 know, what we would hear from experts, which
22 is, yes, this broad corpus is important.

23 So if a young person spends
24 three hours on YouTube, you know, learning
25 how to do algebra, that might be okay. But

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1 this concept in a global sense.

2 Now, as I described in terms of
3 the recommendation dispersion before,
4 different technologies are in
5 different states for different parts
6 of the world. As we've talked about
7 in the case of inference, it was in
8 different states, just like it was for
9 the dispersion piece.

10 But the concept, ideally, is
11 for this under 18 piece. And the idea
12 behind this paragraph, just to put it
13 into context, is what I was alluding
14 to before, which is, advertising is
15 the means by which content on YouTube
16 and, you know, for that matter, really
17 in other parts of the internet, too,
18 is available to families of all kind
19 of economic situations. And so that's
20 why the -- the post, I felt like it
21 was important to address that because
22 it takes money to produce this
23 content, of course.

24 (YouTube-Mohan Exhibit 12
25 marked for identification.)

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1 QUESTIONS BY MS. CONROY:

2 Q. Okay. Let's take a look at
3 what we're going to mark as Exhibit 12, which
4 is a large document, but I'm going to direct
5 you to -- look through it, but I'm going to
6 direct you to some pages when you're ready.

7 A. Okay.

8 Q. And it's GOOGLE 05867998
9 through 8083. And the title is, "Age
10 Assurance Follow-Up, Global Velocity,
11 January 27, 2025."

12 A. Okay.

13 MR. PETROSINELLI: And do you
14 want to say what slides you're going
15 to want him to particularly look at?

16 QUESTIONS BY MS. CONROY:

17 Q. I will.

18 You may want to -- what I'm
19 going to ask you about, it looks like there's
20 a little bit of discussion at the very
21 beginning about your statement in your
22 February 2025 best -- big bets for the
23 company.

24 And then I'm going to look at
25 slide 9. I'm going by the -- I'm going by

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1 the GOOGLE pages now.

2 A. Okay.

3 Q. Slide 22. Slide 24.

4 A. I'm sorry, do you see the
5 GOOGLE pages?

6 MR. PETROSINELLI: Yes, this
7 right here. She's just reading off --
8 so 9 would be this.

9 THE WITNESS: I see. Okay.
10 9 -- you said 9 and then 24?

11 QUESTIONS BY MS. CONROY:

12 Q. Yeah.

13 And then a couple after that,
14 but that will give you a --

15 A. Okay.

16 Q. That will give you a start.

17 A. All right. Let me just leaf
18 through this quickly.

19 Sorry, you said 24. Right?

20 Q. Did I?

21 MR. PETROSINELLI: 22 and 24.

22 THE WITNESS: 22. Okay.

23 Okay. I've -- I haven't looked
24 at every page, but I have glanced at
25 it.

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1 QUESTIONS BY MS. CONROY:

2 Q. I'm going to ask you a
3 question, and you take your time if you want
4 to look at something more.

5 A. Okay.

6 Q. Let's just look at page 2,
7 which is a slide that just says, "Age
8 assurance announcement."

9 A. Uh-huh. I see that.

10 Q. Would this -- would this have
11 been something you saw?

12 A. Would I have seen this deck?
13 I may have seen this deck,
14 yeah.

15 Q. Okay.

16 A. I think so. Again, I don't
17 remember the specifics of it, but this would
18 be logical for me to have seen this deck.
19 Maybe presented to me in a meeting or
20 something.

21 Q. I will represent to you that
22 there are some earlier versions of this, and
23 I used the most recent one, January 27th of
24 2025, because this was an age assurance
25 follow-up, so -- and I did see some of the

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1 A. Not that I'm aware of. It
2 doesn't mean that they haven't, but that's
3 not -- that's not -- I'm not aware of it.

4 Q. Okay. Then if you move to
5 slide 22.

6 A. Okay. 22.

7 Q. See if there's any kind of a --
8 this is part of the appendix --

9 A. I --

10 Q. -- and --

11 A. This is what I have.

12 Q. Yeah.

13 A. Okay.

14 Q. I was just going to show you
15 that it's part of --

16 A. Oh, sorry.

17 Q. If you go back a few, there's
18 an introductory slide that says "appendix."

19 A. Yeah.

20 Q. Just so that you'd see it.

21 And then this slide, 22, says,
22 "Business Impact."

23 Right?

24 A. Yes, I see that.

25 Q. And this would be the business

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1 impact [REDACTED].

2 Correct?

3 A. I'm not sure.

4 Do you mind if I just --

5 Q. Yeah, take a look.

6 A. -- read this, take a look at
7 what this is?

8 Okay.

9 Q. Does that help you answer the
10 question of [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

12 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED].

15 Q. And so was [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

19 MR. PETROSINELLI: Object to

20 the form.

21 THE WITNESS: [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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A 20x20 grid of black and white squares. The pattern of black squares is irregular, forming a series of horizontal and vertical bars of varying widths. The overall effect is reminiscent of a barcode or a stylized, abstract image. The grid is composed of 20 rows and 20 columns, with each cell being either black or white. The black squares are distributed across the grid, creating a complex, non-repeating pattern. The white squares fill the remaining space, providing a high-contrast background for the black squares. The pattern is dense in some areas and sparse in others, with some rows containing more black squares than others. The vertical bars are also of varying heights, with some extending across multiple rows. The overall composition is balanced and visually striking due to the high contrast between the black and white squares.

19 QUESTIONS BY MS. CONROY:

20 Q. And so just to be -- to be
21 clear about what we're -- what we're looking
22 at here, there is a movement announced by you
23 on February 11th of 2025, to machine-learn
24 the age of users so that you could determine
25 who was under 18, either inferred or

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```
1 | declared.
```

2 Right?

```
3 | A.      (Witness nods head.)
```

4 Q. And then that age assurance has
5 a financial component or a business impact.

6	Correct?
---	----------

7 MR. PETROSINELLI: Object to
8 the form.

9 THE WITNESS: Yes. The --
10 there's, as we've talked about,

[illegible]

21 And I think what this slide
22 sort of teases out is that despite
23 this business impact, it's something
24 that we, you know, declare that we
25 wanted to do at YouTube because the

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models have gotten to the point where we could have a pretty good inference model. And so we're willing to take that financial hit in this particular case in the interest of rolling out that model.

A 15x15 grid of black and white squares. The pattern of black squares is as follows:
Row 1: (1,10), (1,11), (1,12), (1,13), (1,14), (1,15)
Row 2: (2,1), (2,2), (2,3), (2,4), (2,5), (2,6), (2,7), (2,8), (2,9), (2,10), (2,11), (2,12), (2,13), (2,14), (2,15)
Row 3: (3,1), (3,2), (3,3), (3,4), (3,5), (3,6), (3,7), (3,8), (3,9), (3,10), (3,11), (3,12), (3,13), (3,14), (3,15)
Row 4: (4,1), (4,2), (4,3), (4,4), (4,5), (4,6), (4,7), (4,8), (4,9), (4,10), (4,11), (4,12), (4,13), (4,14), (4,15)
Row 5: (5,1), (5,2), (5,3), (5,4), (5,5), (5,6), (5,7), (5,8), (5,9), (5,10), (5,11), (5,12), (5,13), (5,14), (5,15)
Row 6: (6,1), (6,2), (6,3), (6,4), (6,5), (6,6), (6,7), (6,8), (6,9), (6,10), (6,11), (6,12), (6,13), (6,14), (6,15)
Row 7: (7,1), (7,2), (7,3), (7,4), (7,5), (7,6), (7,7), (7,8), (7,9), (7,10), (7,11), (7,12), (7,13), (7,14), (7,15)
Row 8: (8,1), (8,2), (8,3), (8,4), (8,5), (8,6), (8,7), (8,8), (8,9), (8,10), (8,11), (8,12), (8,13), (8,14), (8,15)
Row 9: (9,1), (9,2), (9,3), (9,4), (9,5), (9,6), (9,7), (9,8), (9,9), (9,10), (9,11), (9,12), (9,13), (9,14), (9,15)
Row 10: (10,1), (10,2), (10,3), (10,4), (10,5), (10,6), (10,7), (10,8), (10,9), (10,10), (10,11), (10,12), (10,13), (10,14), (10,15)
Row 11: (11,1), (11,2), (11,3), (11,4), (11,5), (11,6), (11,7), (11,8), (11,9), (11,10), (11,11), (11,12), (11,13), (11,14), (11,15)
Row 12: (12,1), (12,2), (12,3), (12,4), (12,5), (12,6), (12,7), (12,8), (12,9), (12,10), (12,11), (12,12), (12,13), (12,14), (12,15)
Row 13: (13,1), (13,2), (13,3), (13,4), (13,5), (13,6), (13,7), (13,8), (13,9), (13,10), (13,11), (13,12), (13,13), (13,14), (13,15)
Row 14: (14,1), (14,2), (14,3), (14,4), (14,5), (14,6), (14,7), (14,8), (14,9), (14,10), (14,11), (14,12), (14,13), (14,14), (14,15)
Row 15: (15,1), (15,2), (15,3), (15,4), (15,5), (15,6), (15,7), (15,8), (15,9), (15,10), (15,11), (15,12), (15,13), (15,14), (15,15)
The overall shape formed by the black squares is a stylized letter 'A'.

But we're going to -- our plan, at least, is to still continue to move forward despite the business impact.

QUESTIONS BY MS. CONROY:

Q. So when I look, I see 1 point -- I'm looking right at the top. It says, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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1

[REDACTED]

2

Do you see that?

3

A. I see that sentence, yeah.

4

Q. And then the first bullet says,

5

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13

MR. PETROSINELLI: Object to

14

the form.

15

THE WITNESS: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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QUESTIONS BY MS. CONROY:

19

Q.

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23

A.

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1 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

9 Q. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
13 assurance, you are likely to have more users
14 who had declared themselves to be over 18
15 show up as actually under 18. And
16 consequently, those individuals cannot have
17 personalized ads.

18 Correct?

19 MR. PETROSINELLI: Object to
20 the form.

21 THE WITNESS: Those individuals
22 will not have personalization [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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1



QUESTIONS BY MS. CONROY:

Q.

11

11

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MR. PETROSINELLI: Object to

the form.

THE WITNESS:

11

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██████████ -- some number of users who might be above 18 are now for some reason classified as below 18. And so, therefore, they get a degraded ad experience as well.

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QUESTIONS BY MS. CONROY:

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22

23

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25

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. And on the flip side, up until the day that the US implements age inference, personalization does take place with a number of users who are under 18 but have declared themselves to be over 18?

MR. PETROSINELLI: Object to the form.

THE WITNESS: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

But, yes, the inference model -- if your question is, will the inference model include more users as a result of it that get these sort of depersonalized ads, then -- then, yes,

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1 Q. And when I look at the top, [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

5 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED]

7 Q. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

11 MR. PETROSINELLI: Object to

12 the form.

13 THE WITNESS: [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

19 QUESTIONS BY MS. CONROY:

20 Q. [REDACTED]

21 A. [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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1 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]

5 Q. Conceptually, would you agree
6 with me that if there is a particular amount
7 of money that can be calculated for
8 implementing age inference in the United
9 States, you could also conceptualize money
10 that has been earned in the past years
11 because of the absence of age inference?

12 MR. PETROSINELLI: Object to
13 the form.

14 THE WITNESS: Yeah,
15 conceptually I could see that. And,
16 you know, as I said, the majority of
17 that gets paid out to our creators in
18 the case of YouTube.

19 So -- but in this case, despite
20 this impact, it's something that we've
21 declared that we want to move forward
22 with. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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1

[REDACTED]

12

QUESTIONS BY MS. CONROY:

13

Q. [REDACTED]

18

A. [REDACTED]

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1 2:47. Going off the record.

2 (Off the record at 2:47 p.m.)

3 VIDEOGRAPHER: The time is now

4 2:55. Back on the record.

5 CROSS-EXAMINATION

6 QUESTIONS BY MR. PETROSINELLI:

7 Q. Mr. Mohan, good afternoon. As
8 you know, I'm Joe Petrosinelli. I represent
9 Google and YouTube. Just a few questions.

10 Can you tell us your
11 educational background?

12 A. Sure, yes. I have a bachelor
13 of science in electrical engineering from
14 Stanford University, and I have an MBA from
15 the Stanford Graduate School of Business.

16 Q. And at some point did you come
17 to work at Google?

18 A. I did, yes.

19 Q. What year was that?

20 A. 2008.

21 Q. And what were your jobs at
22 Google?

23 A. For a long portion of my career
24 at Google I was responsible for our display
25 and video ads business. Ultimately I was the

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1 SVP of that business until about -- towards
2 the end of 2015.

3 Q. And then what happened at the
4 end of 2015?

5 A. The end of 2015, I moved over
6 to YouTube in the capacity of chief product
7 officer.

8 Q. And what were your
9 responsibilities as the chief product officer
10 of YouTube?

11 A. The primary responsibility was
12 oversight of building all of our products for
13 our users, for our creators, and also looking
14 after our content policies and content
15 moderation because those two things go
16 hand-in-hand.

17 Q. And you're now the CEO of
18 YouTube?

19 A. Correct.

20 Q. And when did you become the CEO
21 of YouTube?

22 A. In February of 2023.

23 Q. Mr. Mohan, what is YouTube?

24 A. YouTube is a video-watching,
25 creating and sharing site, application. It's

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1 where users from all over the world come to
2 watch video content, whether it's sports or
3 music or their favorite content creators.
4 And so that's what YouTube is. It's a
5 streaming service that allows people to
6 consume video content.

7 Q. Do you consider YouTube to be a
8 social media platform?

9 A. No, we don't.

10 Q. Why not?

11 A. You know, YouTube really is --
12 it's a streaming service. It's a place where
13 you go and watch video content, just like you
14 do -- most of our consumption happens in the
15 US on television screens now. And so just
16 like you watch any other video service on TVs
17 and other places, you watch YouTube.

18 So the primary use case on
19 YouTube is the consumption of video versus a
20 place where you go to share content or
21 connect with your social graph or what have
22 you.

23 Q. Can children use YouTube?

24 A. Yes, kids can use YouTube. In
25 fact, one of the applications that we built

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1 at YouTube is called YouTube Kids. I think
2 it just a few months ago celebrated its
3 ten-year anniversary. And that's a product
4 that's designed specifically for young kids
5 and their parents.

6 And, you know, minors also use
7 the main app, and we have a number of
8 features on the main app for them as well.

9 Q. What is supervised experience?

10 A. Supervised experiences would be
11 one of those features, which is a feature
12 that parents and their children can use to
13 manage their experience on the main YouTube
14 app.

15 It has settings for a reduced,
16 more limited corpus of content that parents
17 can set up in discussion with their minor
18 children.

19 Q. Does YouTube offer any features
20 that are directed toward children using the
21 platform safely?

22 A. There are a number of features
23 that we've built over the years that are
24 focused on allowing kids to get the rich
25 benefits of YouTube, the learning platform or

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1 what have you, but to do it in a safe manner,
2 including things like Take a Break reminders,
3 Bedtime reminders, the dispersion of content
4 in our recommendation algorithms that would
5 be problematic if seen together but, if
6 dispersed, not so. And a number of other
7 features and parental controls. The ability
8 for parents and teens to be able to link
9 their accounts so that parents have some
10 supervision over them.

11 And so a number of features
12 like are what we've built over the course of
13 the last several years.

14 Q. And have some of those features
15 been added after 2015 when you first came to
16 YouTube?

17 A. Yes.

18 Q. And why did YouTube add those
19 features?

20 A. You know, we have -- it goes
21 back to our philosophy of living up to
22 responsibility is our primary priority. And
23 always seeking to continue to improve our
24 products. It's building multiple layers of
25 defense to make sure that users reap the

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1 rewards and the benefits of a platform like
2 YouTube but do it in a safe manner.

3 Q. And does YouTube make
4 information about these features and how they
5 work available to parents?

6 A. Yes, extensively. Primarily
7 through our help center, which is a part of
8 the product, but also through documentation
9 on our website, through blog posts, through
10 newsletters and a number of different places
11 like that.

12 Q. From what you've observed in
13 your time working at YouTube, first as the
14 chief product officer and now as the CEO, has
15 YouTube taken seriously the safety of its
16 users?

17 A. Absolutely. It's one of our
18 top priorities.

19 Q. And from what you've observed
20 in your time working at YouTube, first as
21 chief product officer and now as CEO, has
22 YouTube been committed to the safety of
23 children who use its platform?

24 A. Of course. Absolutely. It's a
25 top priority.

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1 Q. Just a few more questions,
2 Mr. Mohan.

3 You were asked some questions
4 earlier about Google's ads demographic model.
5 Do you remember that?

6 A. Yes, I remember that
7 conversation.

8 Q. Do you know the specifics of
9 how the ads demographics model operates?

10 A. No, I'm not an expert on that.
11 I haven't -- I haven't been responsible for
12 ads business for quite some time.

13 Q. And do you know what data or
14 signals that tool uses?

15 A. The ad -- the ads --

16 Q. Yeah.

17 A. -- the ads tool?

18 I couldn't tell you the
19 specific signals.

20 Q. And do you know how that ads
21 model compares to the -- compares to the data
22 used or modeling for the AADC age inference
23 model?

24 A. I do not, no.

25 Q. Okay. Mr. Mohan, in your time

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1 working at YouTube, first as the chief
2 product officer and now as the CEO, have you
3 ever felt that the company has prioritized
4 profits over user safety?

5 A. I have never felt that way.

6 Q. And in your time working at
7 YouTube, first as the chief product officer
8 and now as the CEO, have you ever felt that
9 the company prioritized watch time over user
10 safety?

11 A. No.

12 Q. In your time working at
13 YouTube, first as the chief product officer
14 and now as the CEO, have you ever seen the
15 company choose a strategy that put making
16 money ahead of protecting the safety of
17 children who use the platform?

18 A. I have not.

19 Q. Would you ever work for a
20 company that you thought was causing harm to
21 children?

22 A. I personally would never.

23 MR. PETROSINELLI: That's it
24 for me.

25 MS. CONROY: I have no further

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1 questions. Thank you.

2 VIDEOGRAPHER: Plaintiff's
3 counsel total --

4 MR. FLASTER: Excuse me.
5 Before you -- before you go off the
6 record -- I'm sorry, this is Eben
7 Flaster, Shook Hardy. I don't have
8 any questions for the witness, but I
9 do want to make a statement for the
10 record.

11 Joe, can I do that?

12 MR. PETROSINELLI: Sure.

13 MR. FLASTER: Okay. So, again,
14 Eben Flaster from Shook, Hardy & Bacon
15 on behalf of Meta defendants.

16 I just want -- I would object
17 to the protocol employed by the
18 plaintiff's counsel for handling the
19 highly confidential competitive
20 documents and information during the
21 deposition.

22 Specifically, outside counsel
23 for codefendants Meta, TikTok and Snap
24 were essentially forced into a
25 breakout room during the Zoom depo for

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1 about 30 to 40 minutes with no ability
2 to regain access to the deposition
3 until allowed to do so.

4 So that procedure was
5 inconsistent with the provisions in
6 the protective order governing highly
7 confidential documents. Those
8 provisions were designed to address a
9 situation involving in-house attorneys
10 for the companies, not outside
11 counsel.

12 Despite plaintiff counsel's
13 representation, we've participated in
14 literally dozens of these company
15 witness depositions, and this has
16 never happened before.

17 So I just wanted to make that
18 statement.

19 I don't know if counsel for
20 TikTok or Snap have any additional
21 comments or if they want to join my
22 objection, but I wanted to make that
23 statement for the record.

24 MS. KUMAR: This is Poonam
25 Kumar from Gibson Dunn on behalf of

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1 the TikTok defendants. We join in
2 that as well.

3 MS. KONSTANTINOVSKY: This is
4 Julia Konstantinovsky from Munger
5 Tolles & Olson on behalf of Snap, and
6 we also join in the objection.

7 MR. FLASTER: That's all.
8 Thank you.

9 MR. PETROSINELLI: Thank you.

10 VIDEOGRAPHER: Okay.

11 Plaintiff's counsel's total time on
12 the record was 4 hours and 1 minute.

13 Defense counsel's total time on
14 the record was 7 minutes and
15 30 seconds.

16 The time is now 3:04. This
17 concludes the deposition. We're going
18 off the record.

19 (Off the record at 3:04 p.m.)

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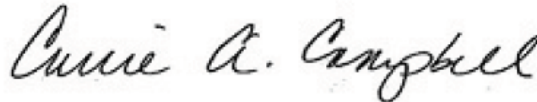
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1 CERTIFICATE

2 I, CARRIE A. CAMPBELL, Registered
3 Diplomate Reporter, Certified Realtime
4 Reporter and Certified Shorthand Reporter, do
5 hereby certify that prior to the commencement
6 of the examination, Neal Mohan, was duly
7 sworn by me to testify to the truth, the
8 whole truth and nothing but the truth.

9 I DO FURTHER CERTIFY that the
10 foregoing is a verbatim transcript of the
11 testimony as taken stenographically by and
12 before me at the time, place and on the date
13 hereinbefore set forth, to the best of my
14 ability.

15 I DO FURTHER CERTIFY that I am
16 neither a relative nor employee nor attorney
17 nor counsel of any of the parties to this
18 action, and that I am neither a relative nor
19 employee of such attorney or counsel, and
20 that I am not financially interested in the
21 action

22 

23 -----
24 CARRIE A. CAMPBELL,
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