

AMENDED Exhibit 1013

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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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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

THIS DOCUMENT RELATES TO:)
_____)

ALL ACTIONS)
_____)
_____)

Wednesday, April 16, 2025

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Video-Recorded Oral Fed. R. Civ. P.
30(b)(6) Deposition of YOUTUBE LLC through
its representative, CAITLIN NIEDERMEYER, held
at the offices of Wilson Sonsini Goodrich &
Rosati PC, One Spear Tower, Suite 3300,
San Francisco, California, commencing at
9:11 a.m. PDT on the above date, before
Michael E. Miller, Fellow of the Academy of
Professional Reporters, Certified Court
Reporter, Registered Diplomate Reporter,
Certified Realtime Reporter and California
CSR #13649.

GOLKOW - VERITEXT
877.370.DEPS | fax 917.591.5672
deps@golkow.com

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P R O C E E D I N G S
April 16, 2025, 9:11 a.m. PDT

THE VIDEOGRAPHER: Good
morning. We're now on the record. My
name is Darnell Brown, and I'm the
videographer with Golkow. Today's
date is April 16th, 2025, and the time
is 9:11 a.m.
This video deposition is being
held in San Francisco, California in
the matter of Social Media Adolescent
Addiction Litigation before the United
States District Court for the Northern
District of California.
The deponent is Caitlin
Niedermeyer.
Counsel will be noted on the
stenographic record.
The court reporter is Mike
Miller, California CSR #13649, and
will now swear in the witness.
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CAITLIN NIEDERMEYER,
having been duly sworn,
testified as follows:

EXAMINATION

BY MR. DRAPER:

Q. Good morning. My name is Glenn Draper. I am one of the attorneys representing the families and other governmental industries that have sued YouTube in these social media cases. I had a chance to introduce myself to you before we went on the record.

Could you just state your name, and spell it, please, for the record?

A. Yes. Caitlin Niedermeyer, C-A-I-T-L-I-N, and then Niedermeyer, N-I-E-D-E-R-M-E-Y-E-R.

Q. Thank you.
And, Ms. Niedermeyer, you are an employee of YouTube, correct?

A. That is correct.

Q. What's your current position?

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1 A. I'm senior manager for the --
2 under public policy for YouTube.

3 Q. And how long have you held that
4 position?

5 A. The senior manager has changed,
6 because it's a promotion, but I have been at
7 YouTube since 2021, and previous to YouTube,
8 I was at Google and had been at Google since
9 2010.

10 Q. Thank you.
11 You have previously testified
12 in this case, correct?

13 A. That is correct.

14 Q. All right. And you understand
15 that today you're not speaking as an
16 individual; you are speaking on behalf of
17 YouTube and Google, correct?

18 A. Yes.

19 Q. All right. When I ask you
20 questions today, I'm not asking about your
21 personal knowledge but rather about the
22 knowledge of YouTube, the corporation.

23 Yes, you understand that?

24 A. Yes.

25 MS. WADHWANI: And, Mr. Draper,

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1 I'm just going to note for the record,
2 if I believe that one of your
3 questions is out of scope, I will make
4 an objection to scope, and
5 Ms. Niedermeyer understands that she
6 will be answering in her personal
7 capacity in response to my objections
8 to scope.

9 I won't say that every time, to
10 not waste your time, but when I say
11 objection to scope and Ms. Niedermeyer
12 answers, she'll be answering in her
13 personal capacity.

14 MR. DRAPER: And we can hash
15 that out with the Court if we need to.

16 BY MR. DRAPER:

17 Q. Ms. Niedermeyer, you understand
18 that as the corporate representative for
19 YouTube, your testimony today is binding on
20 YouTube?

21 A. Yes, I do.

22 Q. All right. And as the
23 corporate representative for YouTube on the
24 topics that we're going to address today, you
25 have an obligation to learn what YouTube, the

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1 corporation, knows about these topics.

2 Do you understand that?

3 A. Yes, I do.

4 Q. All right. That obligation can
5 be met by reviewing documents, not just from
6 your own custodial file, but from any
7 employee that has knowledge about these
8 topics, or by speaking to current or former
9 employees to find out what they know about
10 these topics.

11 Do you understand that?

12 A. Yes, I do.

13 Q. All right. Did you bring any
14 documents with you today to assist you in
15 testifying?

16 A. I did not.

17 Q. The topic for today's
18 deposition, I'll just go ahead and read it:
19 YouTube and Google's knowledge regarding
20 alleged impact and risk of harm on users
21 resulting from the named features, or
22 engagement with the YouTube platform,
23 including overuse, habitual use, problematic
24 use, heavy use, unintended use or late-night
25 use and mental health and well-being.

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1 Are you prepared to testify
2 about this topic on behalf of YouTube today?

3 MS. WADHWANI: Objection to
4 form. And I'll just note that the
5 named features that the parties agreed
6 to were Autoplay, Infinite Scroll,
7 Infinite Playback, Algorithmic Content
8 Recommendations, Video Filters,
9 Notifications and YouTube Shorts.

10 MR. DRAPER: I have a list of
11 named features from the master
12 complaint that's a little bit broader
13 than that, but I'm not sure that I'm
14 going to get into any of those that
15 aren't on that list. We can cross
16 that bridge if we get to it.

17 MS. WADHWANI: The parties
18 agreed to those named features, and if
19 it becomes an issue, Mr. Draper, we'll
20 take it up.

21 MR. DRAPER: Great.

22 BY MR. DRAPER:

23 Q. All right. Ms. Niedermeyer,
24 what did you do to prepare for the deposition
25 today?

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1 A. I met with counsel. I reviewed
2 a large number of documents.

3 Q. Okay.

4 A. I spoke to former and existing
5 employees of YouTube. I reviewed previous
6 testimony. And then I have extensive kind of
7 personal knowledge.

8 Q. Great.

9 When did you learn you would be
10 speaking on behalf of YouTube on this topic?

11 A. The week before last, I
12 believe.

13 Q. Okay. And so when did you
14 first meet with the Google and YouTube
15 counsel about this topic?

16 A. Last Friday.

17 Q. And can you tell me -- have you
18 had -- have you met more than once with them?

19 A. Yes.

20 Q. Can you tell me an estimate of
21 the total length that you've spent with
22 Google and YouTube's counsel preparing for
23 this deposition?

24 A. Probably around 15 to 20 hours.

25 Q. All right. And you mentioned

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1 you reviewed a large number of documents to
2 prepare to address this topic on behalf of
3 YouTube?

4 A. Yes.

5 MR. DRAPER: Have all of the
6 documents -- and this is directed to
7 your counsel.

8 Have all of the documents that
9 Ms. Niedermeyer reviewed been produced
10 in this litigation?

11 MS. WADHWANI: Yes.

12 MR. DRAPER: All right.

13 BY MR. DRAPER:

14 Q. Ms. Niedermeyer, did you select
15 the documents yourself or were they presented
16 to you by YouTube's counsel?

17 A. They were presented to me by
18 YouTube's counsel, and they offered to also
19 let me review testimony, which I reviewed.

20 Q. Okay. Did you make any effort
21 to look at any documents that were not
22 presented to you by YouTube's counsel?

23 A. I primarily focused on the
24 documents that were presented to me by
25 YouTube's counsel.

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1 Q. Yeah. Let me ask that question
2 again because I don't think your answer quite
3 got there.

4 Did you make an effort to look
5 at any documents that you identified, above
6 and beyond those that were presented to you
7 by YouTube counsel?

8 A. No, I focused on the documents
9 that were presented to me by YouTube's
10 counsel.

11 Q. All right. Thank you.
12 You mention you talked to
13 current and former YouTube employees?

14 A. That's correct.

15 Q. Can you tell me which employees
16 you talked to to prepare for the topic today?

17 A. I can't remember the specific
18 names, but there were members of the
19 marketing team, the UX team, and the, kind
20 of, UX research team.

21 Q. Okay. You don't remember any
22 specific names?

23 A. [REDACTED] was one of the people that
24 I spoke with. I'm trying to remember the
25 others. I don't remember the two other

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1 individuals.

2 Q. All right. So there were three
3 total?

4 A. I believe so.

5 Q. All right. Ms. Niedermeyer,
6 does YouTube agree that a corporation should
7 not release an application designed for teens
8 and younger kids without knowing the
9 potential negative impacts and risks of harm
10 resulting from engagement with that
11 application?

12 MS. WADHWANI: Objection to
13 form, scope.

14 A. In general, when YouTube rolls
15 out a new product or feature, we do extensive
16 work to make sure that that product or
17 feature is ready for the demographic that it
18 is available to, including teens, on our
19 YouTube main platform.

20 BY MR. DRAPER:

21 Q. Does YouTube agree that a
22 corporation that wants to release an
23 application designed for teens and younger
24 kids should first test the application to
25 learn the potential negative impacts and

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1 risks of harm resulting from engagement with
2 the application?

3 MS. WADHWANI: Objection to
4 form and scope.

5 A. Again, in general, before we
6 roll out a product or feature to our users,
7 we do extensive research, testing, et cetera,
8 to make sure that it's prepared to roll out.

9 BY MR. DRAPER:

10 Q. Does YouTube agree that a
11 corporation should not add features to an
12 application designed for teens and younger
13 kids without knowing the potential negative
14 impacts and risks of harm resulting from
15 engagement with those features?

16 MS. WADHWANI: Objection to
17 form and scope.

18 A. Again, before we roll out any
19 feature or product, we make sure to
20 extensively research the feature, do testing,
21 review media reports, et cetera.

22 BY MR. DRAPER:

23 Q. Okay. Does YouTube agree that
24 a corporation with an application designed
25 for teens and younger kids that learns

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1 engagement with the application negatively
2 impacts youth and causes harm to children
3 should make changes to that application to
4 improve its safety as soon as possible?

5 MS. WADHWANI: Objection to
6 form and scope.

7 A. Can you repeat the question?

8 BY MR. DRAPER:

9 Q. Sure.

10 Does YouTube agree that a
11 corporation with an application designed for
12 teens and younger kids that learns engagement
13 with the application negatively impacts youth
14 and causes harm to children should make
15 changes to the application to improve its
16 safety as soon as possible?

17 MS. WADHWANI: Same objections.

18 A. Again, in general, before we
19 roll out a feature, we make sure that we've
20 done extensive testing, UXR research,
21 experimented with the feature in order to
22 roll out as kind of age-appropriate
23 experience as possible, and we continue to do
24 due diligence to make sure that that feature
25 is operating in a kind of safer,

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1 age-appropriate way for all of our users.

2 MR. DRAPER: I'm going to come
3 back to that.

4 But could you just explain the
5 nature of your objection to the
6 objection? Scope is fine, but I want
7 to make sure that I didn't make a
8 mistake.

9 MS. WADHWANI: You're asking
10 about any corporation. One, this goes
11 to expert testimony, and she's not
12 here to speak about what corporations
13 generally should do. There's a
14 foundation objection as well.

15 MR. DRAPER: Okay.

16 BY MR. DRAPER:

17 Q. So you mentioned,
18 Ms. Niedermeyer, that YouTube continues to
19 monitor features when they roll out. So if
20 YouTube learns from this monitoring that a
21 feature is potentially harming children or
22 teens, does YouTube believe it should make
23 changes to that feature as soon as possible?

24 MS. WADHWANI: Objection to
25 scope.

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1 A. Again, yes, in general, we do
2 extensive work prior to rolling it out, and
3 then once it's live and rolled out, we do all
4 of the due diligence to make sure that we're
5 getting user feedback, that we're, again,
6 paying attention to reporting externally,
7 that we're paying attention to the latest
8 literature.

9 We also have a Youth Advisory
10 Council that we ongoingly consult with to
11 make sure that our products are age
12 appropriate and kind of a safer space for
13 youth.

14 BY MR. DRAPER:

15 Q. And just to hit the nail on the
16 head, if YouTube learns of a problem through
17 that process, does YouTube believe that it
18 needs to make changes as soon as possible?

19 MS. WADHWANI: Objection to
20 form.

21 A. Yes. If there was a case where
22 we identified something was not working as
23 intended, we would take action to kind of
24 modify.

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1 BY MR. DRAPER:

2 Q. All right. Last one of these.

3 Does YouTube agree that a
4 corporation with an application designed for
5 teens and younger kids that learns engagement
6 with the application negatively impacts youth
7 and causes harm to children, should warn the
8 children and their parents of the potential
9 harm as soon as the corporation knows of it?

10 MS. WADHWANI: Objection to
11 form. Objection to scope.

12 A. Can you repeat the question,
13 please.

14 BY MR. DRAPER:

15 Q. Sure.

16 Does YouTube agree that a
17 corporation with an application designed for
18 teens and younger kids that learns engagement
19 with the application negatively impacts youth
20 and causes harm to children, should warn the
21 children and their parents of the potential
22 harm as soon as the corporation learns of it?

23 MS. WADHWANI: Same objections.

24 A. Again, you're asking me a
25 question about generally YouTube's

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1 perspective about corporation responsibility
2 rather than a YouTube-specific question.

3 But yes, I think in general we
4 would want to make sure that we were -- we,
5 as a company, were taking action --
6 appropriate action if some specific concern
7 was substantiated and we took action to
8 address that concern.

9 BY MR. DRAPER:

10 Q. And would that action include
11 warning children and parents as soon as
12 YouTube learns of the harm?

13 MS. WADHWANI: Objection to
14 form and scope.

15 A. Can you repeat the question?
16 Because now you've interjected YouTube in the
17 question.

18 BY MR. DRAPER:

19 Q. Would the action that you
20 described include warning in children -- I'm
21 sorry, warning children and parents as soon
22 as YouTube learns of the potential harm?

23 MS. WADHWANI: Objection to
24 form and scope.

25 A. So I think you've combined a

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1 couple of things. You were referencing
2 potential harm, and you -- I'd like you to
3 repeat the question, please.

4 BY MR. DRAPER:

5 Q. Let me try and rephrase it.

6 Does YouTube believe that it,
7 YouTube the corporation should warn children
8 and parents whenever YouTube learns that a
9 YouTube feature is potentially harmful to
10 teens and younger kids?

11 MS. WADHWANI: Objection to
12 form. Objection to scope. This is
13 not a topic about warnings. This is
14 talking about knowledge of potential
15 risk and harm of named features.
16 These questions are inappropriate.

17 A. Again, in general, I would
18 disagree with part of your statement, which
19 is that YouTube has identified that some --
20 something has potential harm, so I think I
21 disagree with the kind of basis of your
22 question.

23 BY MR. DRAPER:

24 Q. Okay. So my -- I'm not trying
25 to suggest that YouTube has learned of that,

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1 although we're going to talk about that later
2 on in the deposition.

3 But, hypothetically speaking,
4 if YouTube learned that one of its features
5 was harming children and teens, does YouTube
6 believe it should warn children and parents
7 about that feature?

8 MS. WADHWANI: Objection to
9 form, calls for speculation.
10 Objection to scope.

11 A. So again, in this hypothetical
12 situation, I actually think that our company
13 does extensive work to make sure that we're
14 not rolling out features that could cause
15 harm, and if there were features that could
16 cause harm that were identified on the
17 platform, we would take action and make sure
18 that those features were kind of working as
19 intended for that specific demographic.

20 BY MR. DRAPER:

21 Q. What I don't hear you saying is
22 that YouTube thinks it has an obligation to
23 warn parents and children if it learns of a
24 potential issue on its platform.

25 MS. WADHWANI: Objection to

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1 form, asked and answered, calls for a
2 legal conclusion. Objection to scope.

3 A. Again, I don't think this is as
4 much as a warning. I said that we design our
5 products to be as age appropriate and safe as
6 possible, so if we identified a problem with
7 a specific feature, we would take quick
8 action to address it, not just warn a parent.

9 BY MR. DRAPER:

10 Q. So your answer is ambiguous to
11 me because you said YouTube would take quick
12 action to address any problems it becomes
13 aware of, not just warn the parents.

14 Does part of that quick action
15 that YouTube would take include issuing a
16 warning to parents and children about the
17 feature, or would YouTube simply try to make
18 corrections without issuing a warning?

19 MS. WADHWANI: Objection to
20 form, compound, asked and answered,
21 exceeds the scope.

22 A. Again, I'm not going to
23 hypothesize on whether or not we would warn
24 users. What I will tell you is that YouTube
25 develops and rolls out experiences that are

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1 age appropriate and responsible for all of
2 our users, including our younger users. And
3 if we learn about something that has kind of
4 a cause-and-effect impact to youth, we would
5 take action to, again, adjust our product
6 experiences to make sure that it is most
7 appropriate for younger users.

8 MR. DRAPER: Okay. The first
9 named feature that I want to talk to
10 you about is Age Verification.

11 MS. WADHWANI: Objection to
12 scope. That is not an agreed-upon
13 feature, Mr. Draper, and you've
14 already taken a 30(b)(6) on the topic
15 of Age Assurance and Age Verification.

16 So this is completely out of
17 the scope, and Ms. Niedermeyer is not
18 prepared to talk about this today.

19 MR. DRAPER: This is about
20 harms and YouTube's knowledge of
21 harms.

22 MS. WADHWANI: From named
23 features.

24 MR. DRAPER: From named
25 features. And named features in the

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1 complaint include Age Verification, so
2 I - -

3 MS. WADHWANI: Named features
4 in the agreement between the parties
5 as to the scope of this 30(b)(6),
6 which is not an agreement about the
7 scope of the complaint, is Autoplay,
8 Infinite Scroll, Infinite Playback,
9 Algorithmic Content Recommendations,
10 Video Filters, Notifications and
11 YouTube Shorts.

12 The parties did not agree for
13 purposes of Topic 6.1 to address age
14 verification.

15 MR. DRAPER: Why don't we go
16 off the record and take a break, and I
17 want to talk to another attorney
18 that's working on this case.

19 MS. WADHWANI: Is there a way
20 in which we can proceed with other
21 questions and come back to this, just
22 because we are taking up
23 Ms. Niedermeyer's time?

24 MR. DRAPER: No, there's not a
25 way to do that. Sorry. But I am

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1 committed to having her done and out
2 of here by 1:00 today.

3 MS. WADHWANI: Your intention
4 is to keep -- you don't have any other
5 questions besides age verification
6 today that you can jump to that are on
7 these named features?

8 MR. DRAPER: I have other
9 questions, and I'll ask them in the
10 order I think is appropriate.

11 MS. SIEGEL: Let's go off the
12 record.

13 MR. DRAPER: Let's just go off
14 the record.

15 THE VIDEOGRAPHER: The time now
16 is 9:31, going off the record.

17 (Recess taken, 9:31 a.m. to
18 10:00 a.m. PDT)

19 THE VIDEOGRAPHER: The time is
20 now 10:01. Back on the record.

21 BY MR. DRAPER:

22 Q. Ms. Niedermeyer, we're back on
23 the record after a short break. Did you have
24 an opportunity to talk to YouTube's counsel
25 on the break?

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1 Q. It's only when concentrated by
2 the YouTube algorithm that it becomes
3 potentially harmful?

4 MS. WADHWANI: Objection to
5 form.

6 A. Again, the research that we
7 were presented with in 2021 stated -- or
8 suggests that there are certain categories of
9 content that could be potentially problematic
10 for some teens if viewed in volume.

11 And as soon as we learned about
12 this research from our Youth Advisory
13 Council, we did work to further investigate,
14 just as we do with any kind of media
15 reporting, research that exists, literature
16 reviews, et cetera.

17 BY MR. DRAPER:

18 Q. Change in topic.

19 YouTube has a large number of
20 filters that allow YouTube creators to alter
21 the appearance of their face and body,
22 correct?

23 MS. WADHWANI: Objection to
24 form, foundation.

25 A. Sorry, can you repeat your

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1 question.

2 BY MR. DRAPER:

3 Q. Sure.

4 YouTube has a large number of
5 filters that allow YouTube creators to alter
6 the appearance of their face and body, true?

7 MS. WADHWANI: Same objections.

8 A. That is not true.

9 BY MR. DRAPER:

10 Q. YouTube doesn't have filters?
11 Is that what you're telling me?

12 MS. WADHWANI: Objection to
13 form.

14 A. What I'm telling you is that we
15 do not have filters in the way that you just
16 described them. The types of -- that is what
17 I'm telling you.

18 BY MR. DRAPER:

19 Q. As YouTube's corporate
20 representative, you are telling me that
21 YouTube does not have filters that change the
22 appearance of a creator's face and body in
23 the videos?

24 MS. WADHWANI: Objection to
25 form.

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1 A. So again, the way that you had
2 asked me the question was above and beyond
3 the types of filters that we have.

4 The types of filters that we
5 offer are filters that can change the
6 background of a video, similar to what you
7 can do with a camera. We have filters that
8 enable you to put kind of fun masks on, like
9 cartoon characters, et cetera, similar to
10 what you would do with something like
11 FaceTime. And then we have very limited
12 makeup filters. That's kind of the scope of
13 filters that we offer.

14 BY MR. DRAPER:

15 Q. You have filters that change
16 people's eye color?

17 A. I think we may have filters
18 that adjust eye color.

19 Q. You have filters that make
20 people's teeth brighter?

21 A. Yes.

22 Q. You have filters that give
23 people freckles?

24 A. I don't know about freckles.

25 Q. You do.

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1 These filters are popular at
2 YouTube. A lot of creators use them?

3 MS. WADHWANI: Objection to
4 scope?

5 A. In general, creators often test
6 these types of features, but yes, users, I
7 think, value this type of thing.

8 Also, these are types of kind
9 of effects that you get in a number of
10 applications. You have the ability to smooth
11 out certain skin or add colors to background
12 through kind of general camera features, just
13 to be clear.

14 BY MR. DRAPER:

15 Q. YouTube is aware that there are
16 studies that have been published showing the
17 use of filters promotes body dysmorphia and
18 depression because people can't live up to
19 the unrealistic beauty standards in real
20 life?

21 MS. WADHWANI: Objection to
22 form.

23 A. So we are aware that there is
24 general media reporting and research on
25 certain types of beauty filters, which we do

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1 not describe our filters as, as having an
2 impact on some of the things that you
3 mentioned, like body dysmorphia.

4 So when there are filters that
5 allow kind of dysformation [sic] or kind of
6 anything that could be done surgically, yes,
7 there is research that exists out there.

8 And to be clear, users provided
9 feedback. We also looked at the research,
10 and we don't have those types of filters in
11 place. So I just want to be clear on what we
12 have and what we don't have.

13 BY MR. DRAPER:

14 Q. YouTube permits third-party
15 filters?

16 A. We allow third-party filters,
17 yes.

18 Q. YouTube once considered a
19 feature that would label videos that employed
20 filters so that viewers would know that the
21 images had been altered, true?

22 MS. WADHWANI: Objection to
23 scope.

24 A. I don't know the specifics
25 about that.

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1 BY MR. DRAPER:

2 Q. YouTube elected not to go
3 forward with that feature; isn't it true?

4 MS. WADHWANI: Objection to
5 scope.

6 A. Again, I don't know the
7 specifics of that.

8 BY MR. DRAPER:

9 Q. All right. Change in topic.
10 One of the impacts of engaging
11 with the YouTube platform is addiction, and I
12 want to ask you about that now, all right?

13 MS. WADHWANI: Objection to
14 form, argumentative.

15 A. Yeah, can you please repeat
16 your statement?

17 BY MR. DRAPER:

18 Q. Sure.

19 One of -- well, it's a
20 prefatory. Here's the first question for
21 you, okay?

22 A. Okay.

23 Q. YouTube designed its platform
24 with the intention that it be addictive,
25 correct?

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1 MS. WADHWANI: Objection to
2 form, argumentative, scope.

3 A. Not correct.

4 BY MR. DRAPER:

5 Q. And YouTube is aware that some
6 features on the YouTube application
7 contribute to addiction of users, correct?

8 MS. WADHWANI: Objection to
9 form.

10 A. Not correct.

11 BY MR. DRAPER:

12 Q. YouTube intended certain
13 features on its application to contribute to
14 addiction, right?

15 MS. WADHWANI: Objection to
16 form and scope.

17 A. Not correct.

18 BY MR. DRAPER:

19 Q. All right. Let me show you a
20 document that has been produced by YouTube
21 and Google attorneys. It's designated
22 00767071.

23 (Whereupon,
24 YouTube-Niedermeyer-3, YouTube Main
25 App Deep Dive with Neal and Matthew

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1 CERTIFICATE

2 I, MICHAEL E. MILLER, Fellow of
3 the Academy of Professional Reporters,
4 Registered Diplomate Reporter, Certified
5 Realtime Reporter, Certified Court Reporter
6 and Notary Public, do hereby certify that
7 prior to the commencement of the examination,
8 CAITLIN NIEDERMEYER was duly sworn by me to
9 testify to the truth, the whole truth and
10 nothing but the truth.

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

17 I DO FURTHER CERTIFY that pursuant
18 to FRCP Rule 30, signature of the witness was
19 not requested by the witness or other party
20 before the conclusion of the deposition.

21 I DO FURTHER CERTIFY that I am
22 neither a relative nor employee nor attorney
23 nor counsel of any of the parties to this
24 action, and that I am neither a relative nor
25 employee of such attorney or counsel, and
26 that I am not financially interested in the

27
28 

29 _____
30 MICHAEL E. MILLER, FAPR, RDR, CRR
31 Fellow of the Academy of Professional Reporters
32 NCRA Registered Diplomate Reporter
33 NCRA Certified Realtime Reporter
34 California CSR #13649

35 Dated: April 16, 2025