

AMENDED Exhibit 1019

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 PROCEEDINGS

2 THE VIDEOGRAPHER: Good morning. We are
3 now on the record. My name is Miguel Concepcion.
4 I'm a videographer for Golkow.

5 Today's date is March 13, 2025, and the
6 time is 9:26 a.m. Pacific Time.

7 This video deposition is being held at
8 Wilson Sonsini in Palo Alto, California, In Re:
9 Social Media Adolescent Addiction/Personal Injury
10 Products Liability Litigation, for the United States
11 District Court, Northern District of California.

12 The deponent is Raj Iyengar in his 30(b)(1)
13 capacity and his 30(b)(6) capacity for
14 Google/YouTube.

15 All counsel will be noted on the
16 stenographic record. After the court reporter
17 introduces herself, she will swear in the witness.

18 THE STENOGRAPHER: My name is Jenny
19 Griffin. My CSR number is 3969.

20 - - -

21 RAJ IYENGAR,
22 having been first duly sworn and/or affirmed by the
23 Certified Shorthand Reporter to tell the truth, the
24 whole truth, and nothing but the truth, testified as
25 follows:

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1 EXAMINATION

2 BY MS. PAULSON:

3 Q. Good morning, Mr. Iyengar. Thank you for
4 being here today. My name is Jenny Paulson. I'm
5 one of the plaintiffs' attorneys.

6 MS. PAULSON: Before we start today, I'd
7 like to state for the record that Mr. Iyengar was
8 noticed as a 30(b)(1) fact witness and then
9 designated as a 30(b)(6) corporate representative
10 for Google and YouTube a few days ago.

11 We are going to proceed with the 30(b)(1)
12 testimony to start, then move on to the 30(b)(6)
13 testimony, and we will make that distinction clear
14 in the record.

15 We understand that defense counsel
16 disagrees with this order and will make their own
17 record.

18 MS. MACHOCK: Thank you.

19 This is Samantha Machock from Wilson
20 Sonsini for the Google/YouTube defendants. I just
21 wanted to state on the record before we start that,
22 given the timing and scope of the 30(b)(6) notice
23 plaintiffs served only a few weeks ago, we have
24 offered a topic today, the general types of Google
25 accounts available to youth users to access the

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1 account to their teen's account for the purposes of
2 supervising it.

3 BY MS. PAULSON:

4 Q. Can a parent see what their teen is
5 watching?

6 A. No.

7 Q. How can a parent supervise through this
8 experience?

9 A. The -- what was launched in September is
10 focused on supervising creation on YouTube. And so
11 if a teen that is being supervised uploads a video,
12 parents get notified via email that this has
13 happened. They also get notified of the visibility
14 of the video and they have access to a dashboard
15 with high-level creation and participation stats.

16 Q. Can they see stats on watch time?

17 A. No.

18 Q. Are these experiences available on both the
19 YouTube main app and the YouTube main web
20 experience?

21 MS. MACHOCK: Objection. Form. Lacks
22 foundation.

23 THE WITNESS: These features are -- the
24 dashboard is available for parents, and the email
25 notifications are agnostic of platform.

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1 BY MS. PAULSON:

2 Q. Is there an age limit of a user to whom a
3 parent can link to?

4 MS. MACHOCK: Objection. Form.

5 THE WITNESS: There is no upper age limit
6 in terms of an account that a parent can link to.

7 BY MS. PAULSON:

8 Q. And can a parent change the child or teen's
9 settings after setting up the account?

10 A. Can you clarify what you mean by "setting
11 up the account"?

12 Q. Sure.

13 So you said that when a parent creates or
14 links his account, they have to choose certain
15 settings?

16 A. Are you --

17 MS. MACHOCK: Objection. Form. And
18 misstates prior testimony.

19 BY MS. PAULSON:

20 Q. Did you describe earlier how you can't
21 proceed through setting up this experience without
22 setting, like, a content level; correct?

23 A. In the context of the SupEx experience,
24 yes, I did.

25 Q. Okay. That's not the same for the

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1 teen-supervised experience?

2 MS. MACHOCK: Objection. Form. And
3 misstates prior testimony.

4 THE WITNESS: That's correct.

5 BY MS. PAULSON:

6 Q. Okay. So what settings are available to a
7 parent when they link the accounts for the
8 teen-supervised experience?

9 MS. MACHOCK: Objection. Form. And to the
10 extent that it misstates prior testimony.

11 THE WITNESS: The teen experience is really
12 more designed around giving parents visibility and
13 awareness. It is not about providing restrictive
14 controls in the current launch.

15 BY MS. PAULSON:

16 Q. Are there any restrictive controls
17 available to a parent?

18 MS. MACHOCK: Objection. Form.

19 THE WITNESS: Parents that are supervising
20 an account at the device level would have additional
21 controls outside of YouTube -- YouTube's teen
22 supervision offering.

23 BY MS. PAULSON:

24 Q. What kind of controls?

25 A. The parent that is supervising at an

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1 operating system level, for example. So whether
2 they're supervising an Android device or an iOS
3 device, there are various parent controls that are
4 available where a parent can limit time spent on
5 certain apps, for example.

6 Q. That's outside of the YouTube app or web
7 browser; correct?

8 MS. MACHOCK: Objection. Form.

9 THE WITNESS: It's outside of the specific
10 features that YouTube offers.

11 BY MS. PAULSON:

12 Q. So does the parent get an alert if the teen
13 creates something?

14 MS. MACHOCK: Objection. Form.

15 THE WITNESS: Parents get an email if their
16 teen that they are supervising creates something.

17 BY MS. PAULSON:

18 Q. Okay. And then can the parent view what
19 the teen created?

20 A. It would depend on the privacy setting of
21 the video. So if the video is public or if the
22 video is unlisted, then the parent would receive a
23 thumbnail of the video as well as a link to view it.

24 If the video is private, then we inform the
25 parent that their teen has uploaded a private video.

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1 But we don't provide the link in that case.

2 Q. So there may be a circumstance where the
3 teen creates a private video, the parent gets an
4 alert, but the parent can't view it because of the
5 privacy settings the teen has placed on their
6 account?

7 MS. MACHOCK: Objection. Form. Misstates
8 prior testimony.

9 Go ahead.

10 THE WITNESS: Parents would not be able to
11 view the information about the video in that case,
12 although the purpose of sending the notification is
13 so that they have awareness that their teen has
14 uploaded privately. The intention is that they can
15 follow up with them and have a conversation with
16 them about it and find out more.

17 BY MS. PAULSON:

18 Q. And if the setting is public and the parent
19 views it and doesn't want their teen to have that
20 kind of video out there, is there anything within
21 that experience that the parent can do to get that
22 video taken down?

23 MS. MACHOCK: Objection. Form.

24 THE WITNESS: The parent can have a
25 conversation with their teen and basically, like,

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1 work with them to make the video private.

2 BY MS. PAULSON:

3 Q. But there's no control or setting within
4 YouTube itself that the parent can unilaterally have
5 that video taken down?

6 MS. MACHOCK: Objection. Form.

7 THE WITNESS: Parents are not in control of
8 the teen's channel; but the intention, as I said, is
9 that parents would have a positive conversation with
10 their teen to sort of steer them in the right
11 direction and also work with them to course-correct
12 as needed.

13 MS. PAULSON: I am going to hand you what
14 we'll mark as G/YT-Iyengar Exhibit 3.

15 (Exhibit 3 was marked for
16 identification and is attached to the
17 transcript.)

18 THE WITNESS: Can I close this?

19 BY MS. PAULSON:

20 Q. Sure.

21 A. Okay.

22 Q. Do you recognize this document?

23 A. Yes.

24 Q. Can you describe this document?

25 A. This document was a promo packet write-up

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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

This document Relates to:

ALL ACTIONS

HIGHLY CONFIDENTIAL COMPETITOR

VIDEOTAPED DEPOSITION OF RAJ IYENGAR
IN HIS 30(b)(1) CAPACITY
PALO ALTO, CALIFORNIA
MARCH 13, 2025
9:26 A.M

Job No. 7222056-30(b)(1)
Pages 1 - 146
Stenographically reported by:
JENNY L. GRIFFIN, RMR, CSR, CRR, CCRR, CRC
CSR No. 3969

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1 Q. Is YouTube promoting these device-level
2 controls?

3 MS. MACHOCK: Object to form.

4 THE WITNESS: We do mention in our help
5 center articles that there are device supervision
6 available via Family Link.

7 BY MS. PAULSON:

8 Q. What is Family Link?

9 A. Family Link is a Google app that another
10 team at Google has created for the purpose of
11 supervising other Google accounts, including Unicorn
12 accounts, as well as any Android and maybe some
13 iOS limits as well.

14 Q. How do you link an account? In other
15 words, do you need permission from an account to
16 link it in Family Link?

17 MS. MACHOCK: Object to form.

18 THE WITNESS: For an under-13 account, the
19 under-13 account can't exist unless the parent
20 creates the account. So it's linked because the
21 parent created it.

22 For an over-13 account, the -- I believe
23 that the over-13 account must agree to be
24 supervised. But I don't work on that day to day; so
25 I don't have the specifics.

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1 BY MS. PAULSON:

2 Q. Okay. And last tab here.

3 "How would we measure success?"

4 A. Yes.

5 Q. Do you see "digital well-being" under
6 "objective"?

7 A. Yes.

8 Q. And then the potential metrics, it says:

9 "Research to measure outcomes."

10 Does this mean YouTube was researching
11 how to measure an outcome for digital well-being?

12 A. I don't remember.

13 MS. MACHOCK: Object to form.

14 MS. PAULSON: I think those are all the
15 questions I have right now. Do you mind if we take
16 a short break and just make sure?

17 MS. MACHOCK: Uh-huh.

18 THE VIDEOGRAPHER: Going off the record at
19 1:17 p.m.

20 (Recess taken.)

21 THE VIDEOGRAPHER: We're back on the record
22 at 1:53 p.m.

23 MS. PAULSON: Mr. Iyengar, subject to any
24 questions by your attorney, I have no more questions
25 for the 30(b)(1) portion of this deposition. Thank

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1 you.

2 EXAMINATION

3 BY MS. MACHOCK:

4 Q. Thank you.

5 Good afternoon, Mr. Iyengar.

6 A. Good afternoon.

7 Q. I know you spoke about this previously, but
8 could you please remind us of your current role at
9 YouTube?

10 A. I'm a group product manager at YouTube, and
11 I oversee a team that works on all of the
12 parent-supervised experiences at YouTube.

13 Q. What has kept you at YouTube for so long?

14 A. A lot of things. You know, I like the
15 culture at the company. It's a consumer-facing
16 product that's known and loved by people all over
17 the world. So that's always fun to be able to say
18 that I work at YouTube.

19 I like my colleagues. I like the work that
20 we do. It gives me some sense of fulfillment to
21 know that I'm working on responsible experiences
22 that are used by families.

23 Q. Do you believe that YouTube is committed to
24 the safety of children and teens who use its
25 service?

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---oOo---

I, JENNY L. GRIFFIN, hereby certify:

That I am a certified shorthand reporter in and for the County of Alameda, State of California;

Prior to being examined, RAJ IYENGAR, the witness named in the foregoing deposition, was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth; that said deposition was taken pursuant to notice at the time and place therein set forth, and was taken down by me in stenotype and thereafter transcribed by means of computer-aided transcription, and that said deposition is a true record of the testimony given by the witness.

I further certify that I am neither counsel for nor related in any way to any party to said action, nor otherwise interested in the outcome thereof.

In witness whereof, I have hereunto subscribed my name March 18, 2025.



JENNY L. GRIFFIN, CSR #3969
Certified Shorthand Reporter