AMENDED Exhibit 1022

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/ PERSONAL INJURY PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

_____

This Document Relates to:
ALL ACTIONS

_____

VIDEOTAPED DEPOSITION OF
REID WATSON
HIGHLY CONFIDENTIAL
Wednesday, March 12, 2025
PALO ALTO, CALIFORNIA

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

Q. Okay. But you were the PM who was responsible for YouTube's digital wellbeing launches, right?

A. Yes. That's correct.

Q. And so as the individual responsible for the measures anticipated to prevent these issues, did you think it was important to understand the research and analysis concerning what the issues are?

MR. CHIOU: Objection to form.

You may respond, Mr. Watson.

THE WITNESS: Yeah, I'd say we wanted to understand these issues. Again, I mean, this is part of why we engage with the visioning team, was to try and learn more and continually improve the product.

BY MS. SIEGEL:

Q. Okay. Let's go to the page that looks like this, "Measure moment."

A. Okay.

Q. Okay. It says (as read):

Measurement Approach.

Oh, it doesn't say moment. Sorry, I misread that.

Okay. It says (as read):

Platform Behavior (logs).

Talking about Platform Behavior.

Did YouTube end up actually reviewing the platform behavior logs to measure the performance of the digital wellbeing tools?

A. We reviewed user logs to measure performance of wellbeing tools. I'm not sure the specific analyses that they're referring to here.

Q. When did you review -- what did you review in the user logs to measure performance of the wellbeing tools?

A. We looked at stats like reach, enablement and delivery. So as we built out these tools, we wanted to see how many people were looking at them, how many people were checking out their time watched profile, how many people were turning on notifications digest and those sort of things.

So I recall looking at logs of those and being happy as they went up and we saw more people using those tools.

Q. Got it.

Could you go to the next page, and then under "Habitual Heavy Use," it says (as read):

Dashboard 2.0, High-use

alerts, Daily time limits.

BY MS. SIEGEL:
Q. Sure.
But if you read the sentence, then you were at least aware of the authors' understanding that cell phone use in school might be an issue; is that fair to say?
MR. CHIOU: Objection to form.
You may respond, Mr. Watson.
THE WITNESS: Yeah. I mean, I think the text says that France banned it. So I think -- again, I don't recall when this was reviewed, what comments I wrote, whether I had spent a bunch of time on this or a little. But, like, the text does say about France's ban and China's actions.
BY MS. SIEGEL:
Q. Have there been any discussions at -- at YouTube that you're aware of about the use of -- strike that.
Any -- have there been any discussions at YouTube that you're aware of about YouTube causing a distraction at school?
A. The topic has come up. I don't -- I can't think of a specific forum or presentation that was tailored to that topic in particular, but I recall talking about it at points in time.

Q. Okay. Have there been any considerations -- were there any considerations during those conversations about turning off or limiting access to YouTube for underage users during school hours?

A. Those conversations would have been led by the YouTube youth team. I know they had tools for school administrators to control access to YouTube, but that wasn't my primary area of work. I'm just less familiar with those.

Q. So no discussions that you were a part of as part of the digital wellbeing features to limit use during particular hours of the day?

A. We did work on a couple features that were trying to be thoughtful about time of day use that launched with both the Google I/O MVP and some of the future stuff.

Q. By "time of day use," what do you mean by that?

A. Well, your question you asked about features, looking at the time of day when YouTube was being used. And we had a couple wellbeing features that we launched that were specifically thinking about the time of day in which we were delivering notifications or the time of day in which

you were using YouTube.
Q. Were they mostly discussions about nighttime use versus school hour use?
A. Anything related to school hour use, that would have been handled by the youth team. They -- they led the sort of planning around how to handle, you know, discussions with schools and those sort of things.
Q. Okay.
THE VIDEOGRAPHER: Time is now 11:16. Going off the record.
(Whereupon, a recess was taken from 11:16 a.m. to 11:18 a.m.)
THE VIDEOGRAPHER: Time is now 11:18. Back on the record.
BY MS. SIEGEL:
Q. Okay. And then it says (as read):
Google prioritized wellbeing as a top OKR and looks to YouTube, one of the world's popular apps, for leadership in supporting wellbeing.
Do you agree with that?
A. Yes. We -- we prioritized digital wellbeing as a top OKR, and Google looked to YouTube

for users. When we talked about these, we thought it was good that we weren't annoying people with notifications that bothered them.

BY MS. SIEGEL:

Q. Okay. Let's go to the next page. It says, "Time Watched Profile."

A. Yes, I see that.

Q. If you go to the next page.

Is this an accurate representation, to the best of your knowledge, about what the time watched profile looked like when it was launched?

A. I'm not sure the exact timing of what launched when. This looks somewhat similar. I know we added a graph of these statistics, but, I mean, a lot of these things seem familiar.

Q. When you say you added a graph, did you add a graph at the initial time of launch or subsequently?

A. I don't recall.

Q. Okay. All right. We can go on to the next exhibit, which, hopefully, will be relatively short. It's going to be tab 40.

(Whereupon, Deposition Exhibit 15 was marked for identification.)

/ /

BY MS. SIEGEL:
Q. All right. So this is going to be Exhibit 15. And it's Bates Number -05662841.ECM.
A. Thank you.
MR. CHIOU: Mm-hmm.
BY MS. SIEGEL:
Q. Okay. And it looks like this is a document titled "YT Break Watch Reminder," and then it looks like Reid W. is listed as -- is listed there.
Does that indicate that you were the author or coauthor of this what I believe to be a PRD?
A. Yes. That text indicates I'm an author, coauthor.
Q. And is this a PRD?
A. I believe so.
Q. I'll represent that the file name is "PRD, YT Break Reminders."
A. Then it probably is.
Q. Wonderful.
Okay. And it says (as read):
Context/rationale. Users have complained that they can be "sucked in" to YouTube watching more than

they initially wanted to.

Is that an accurate depiction of what the context or rationale for the launch of this project was?

A. Yeah, I think we wanted to respond to the sort of feedback we've been hearing that we've discussed even today and give them a way to trigger an interruption.

Q. Okay. And it says that (as read):

Vertical apps are not supported. Desktop, Tablet and web Main Apps are not supported. Issues with Digital Wellness are most serious on --

I will go slower. And the native -- you read nice and slow, I should have you read it. Okay.

It says (as read):

Desktop, tablet and web main apps are not supported.

Did -- are desktop, tablet and Mweb main apps currently supported in YouTube break watch reminder?

A. I'd have to check to be sure.

Q. So you're not sure, one way or another?

A. I'd have to check to be sure.
Q. Okay. Can you go to the page that says -05662846.ECM?
A. Of course. I see that.
Q. Okay. And it says (as read):
Success Metrics and Launch Criteria. We expect low adoption since the feature is opt-in.
Do you see that?
A. Yes.
Q. Does having a feature -- what does that mean?
Why is adoption lower when a feature is opt-in verse [sic] opt-out?
A. In this context, I -- I would assume that we're saying that users would proactively turn the feature on rather than have it enabled by default. And when users have to take a step to turn something on, we would expect to see lower usage.
Q. Is the same true when -- is the reverse true when users have to turn something off?
In other words, you would expect higher usage?
A. Yes. If something was on by default, we would expect more users to interact with it.

and Bedtime Reminders on by default for all users ages 13 to 17 on YouTube.

Would those apply to users who were using the service logged out?

A. I'm not sure.

Q. Did YouTube turn default on for these features in the United States for logged out users at that time?

A. I don't believe so.

Q. Okay. And would that apply to users that were 13 to 17 that had misrepresented their age on the platform?

A. We would use a user's declared age in the U.S. to trigger these.

Q. So in other words, not on by default for all users ages 13 to 17, but on by default for users with a declared age of 13 to 17?

A. Yes. When we say users aged 13 to 17, I think that's referring to declared age.

Q. Okay. Thank you.

All right. Let's go back to -- or let's go to the next exhibit, which will be -- or rather, let me have my colleague put together the next exhibits we're going to use and I'll ask a few

exhibit, which is going to be Exhibit 23.
BY MS. SIEGEL:
Q. And then it's an email from you to Erin Turner, and it looks like its response to question about what metrics are tracked when Digital Wellbeing features are launched; is that right?
A. I see an email from Erin saying (as read):
Can you share the framework for measuring success of --
(Reporter clarification.)
THE WITNESS: (As read):
Wondering if you can share the framework for measuring success of Digital Wellbeing breaks and bedtime reminders.
BY MS. SIEGEL:
Q. And what was your response?
A. (As read):
Good questions, and unfortunately, we don't have a super clear answer. When we first launched Digital Wellbeing tools, it was tied in with the larger Google I/O announcement about DWB. We focus success measurement on

launching and getting adoption.
Q. Okay. And then -- sorry.
And then if you go to Erin's response she said (as read):
Thanks Reid, could you remind me of the metrics that you track on them?
And so the first email time, what did you respond?
A. The email at the --
Q. The last email in time.
A. Yes. Sorry. It's reverse order. It's tricky to read.
I said (as read):
Number of users who see a Take a Break reminder. Number of users who see a bedtime reminder. Number of users who check their time watched stats. We also check top line YTT metrics when rolling out new features to make sure we didn't break anything. They're expected to be neutral though.
Q. So does that indicate that when a new feature is launched, you're not expecting it to

affect YouTube Time at all?

MR. CHIOU: Objection to form.

You may respond, Mr. Watson.

THE WITNESS: This is referring to the technical launch of it, which enables the capability. For something like this, we would expect to see, you know, if you made it possible to turn on something, we'd be surprised if we saw a large drop in top line YouTube Time and might indicate that we had somehow broken the technical components of the app.

We would, when we started doing stuff like nitrate campaigns, telling people about those, that's where we would expect to see stuff like top line YouTube Time impact when we started messaging these things to users.

BY MS. SIEGEL:

Q. Did YouTube track top line YouTube Time metrics when they launched the nitrate campaign?

A. I don't recall.

Q. And earlier you testified that nitrate was YouTube's -- maybe I'll just ask again, what is nitrate?

A. It's our -- it's our in-app messaging platform.

CERTIFICATE OF REPORTER

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

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

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

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

_____ Reading and Signing was requested.

_____ Reading and Signing was waived

___x___ Re[illegible] Kathleen Maltbie [illegible]ested.

_____

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