AMENDED Exhibit 1026

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

PRIVILEGE

Teen Well-being

Mission: Fun, Responsible, Useful

May 3, 2022

Youth Team

EXHIBIT
2
YOUTUBE-NIEDERMEYER

YouTube

Privileged & Confidential

Slide 1 Notes

Hi everyone, today we're talking about youth well-being

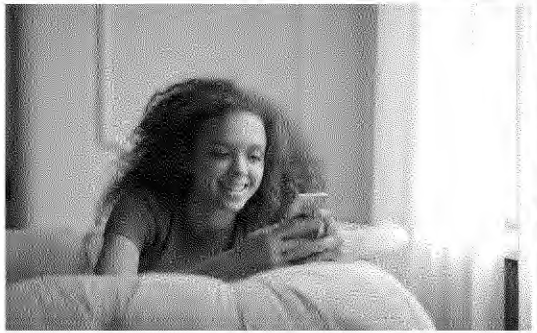
well-being

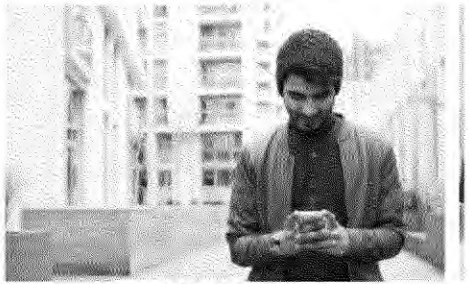
(noun) \ ˈwel-ˈbē-iŋ

an overall outcome described as judging life positively and feeling good;

primarily characterized by its emotional, social, physical, and developmental components

Centers for Disease Control: Well-being Concepts





Slide 2 Notes

Intro
Youth team:

- Developmental needs of youth
- Started by looking at developmental needs of young kids and creating a kids quality metric & signal to reduce low quality & raise high quality kids content.
- Now thinking about developmental needs of teens & exploring the teen wellbeing problem

What is Wellbeing?
In general terms, wellbeing is an overall outcome described as judging life positively and feeling good. It can be further broken down into sub-components, primarily emotional wellbeing, social wellbeing, physical wellbeing, and developmental wellbeing.

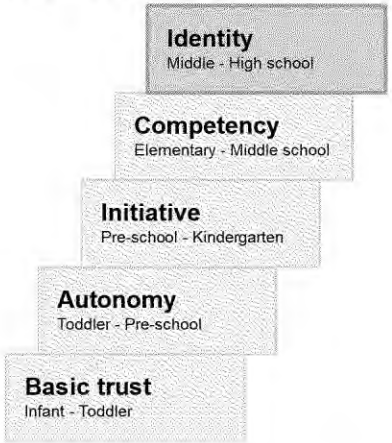
Wellbeing is particularly important for teens because positive wellbeing enables them to deal with the challenges of adolescence and eases their transition into adulthood.

https://www.cdc.gov/hrqol/wellbeing.htm

Teens are different from adults…

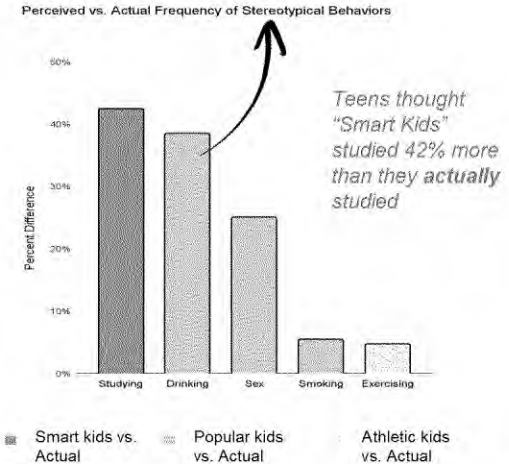
Forming an identity

Teens are establishing their identities and understand who they are *in relation to others*



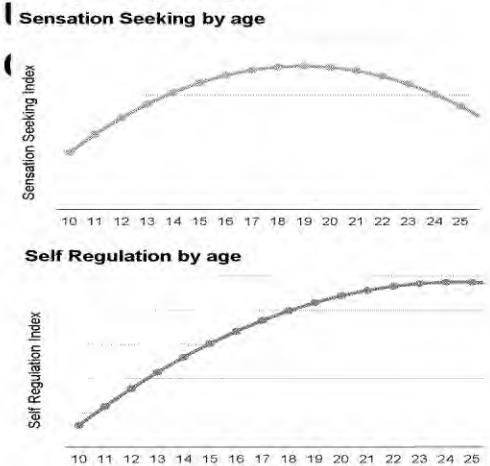
Highly Impressionable

The perception of norms, influenced by external cues like social media, *shape behavior*



More Impulsive

Teens are "sensation seekers", look for and *emulate extreme experiences* without



TLDR: **Teens look to external cues to establish norms and are easily influenced by the repetition of messages they see online.**

Source: Teen Psychology UXR

Slide 3 Notes

[redacted] Slide

In the context of teens, they are particularly sensitive because teens have different developmental needs from adults. The 3 key developmental factors of teens:

- They are still forming their identity
- They are highly impressionable
- They are more sensation seeking

Thus, teens are looking for external cues to establish norms and more heavily influenced by the repetition of messages online.

YT has a suite of interventions to support teen wellbeing challenges, but there is a gap.

Lower Impact
More Teens

High Impact
Fewer Teens

	HABITUAL HEAVY USE	PROBLEMATIC CONTENT		RISKY INTERACTION
Top Concerns	Spending too much time on YT	**Problem of Volume** Watching too *many* potentially negative videos may impact wellbeing	**Problem of 1** Watching *a single* video associated with harmful mental health disorders	Moment of Crisis Cyber-bullying, grooming
Examples of Support	Take a break reminder Bedtime reminder	Today's Topic	Thwarting pathways to harmful content Raise authoritative content	Crisis Onebox Harassment Policy

Slide 4 Notes

What does this mean for YT?

YT has a suite of interventions to support the top wellbeing challenges teens face, but there is a gap.

Led by foundational efforts across many other teams, these examples show how we support wellbeing challenges for all users.

For instance, on the left, a challenge could be spending too much time on YT, and for that we have take a break reminders. Challenges on the left affect more people but might have lower impact per individual.

On the right, a smaller # of people face high impact challenges, like moment of crisis or watching a video with harmful mental health misinfo, and examples of our support there are the crisis onebox and raising authoritative content.

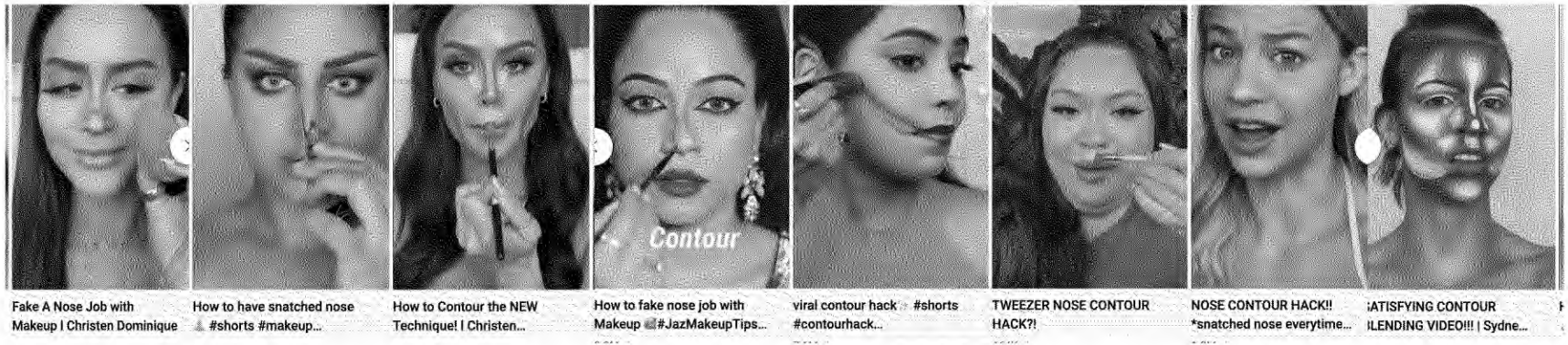
Wrt teens, we aren't finished in these areas; however, the biggest gap in our intervention space is the Problem of Volume: content problematic in volume, which is teens watching too many potentially negative videos that impact their wellbeing, and that's what we're going to talk about today.

These are examples of support we have in general for all users, but we aren't finished in these areas and there is ongoing work to adapt some of these to be more teen centric. However, the biggest gap in our intervention space is the problem of volume, which is what we're talking about today.

There is a foundation of work led by other teams, but wrt to teens, this is an effort we need to focus on and should adapt some of these foundational work to be more teen centric

Problem: Watching a high volume of content that has potential negative impact (PNI) to wellbeing

For example, negative social comparison of physical appearances:



Quotes from Teen Developmental Experts

"Watching too many, someone may start thinking: "

"Seeing these on repeat as they construct worldview "

Slide 5 Notes

To reiterate, the problem is teens are watching a high volume of content that has potential negative impact (or PNI) to wellbeing by repeating skewed norms.

Example: Negative social comparison videos that are all sending the same message to teens "make your nose smaller because that's better".

In our lit reviews & consultations with developmental experts,, they have said that too much of this content may lead teens to normalize this and feel pressured to do the same thing because their perception of reality is distorted

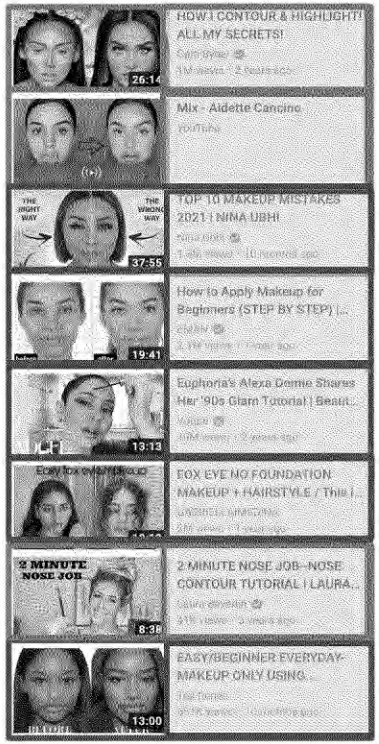
A key point we want to make here is that it's a problem of volume, and individually, or even a few of these videos may be OK.

A feed in a teen session can have a high volume of videos that repeat the same message

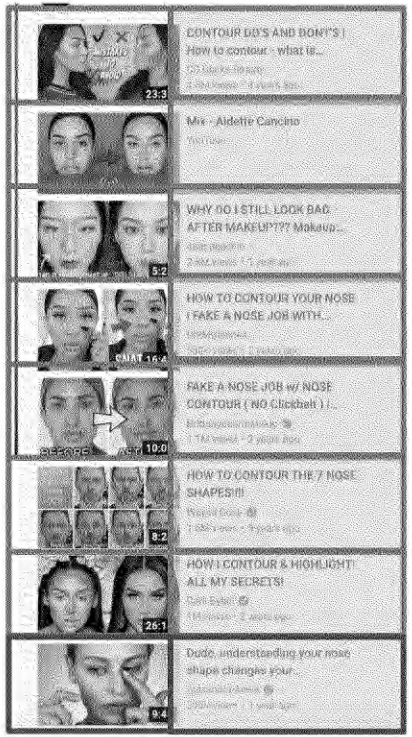
Negative Social Comparison

Concentrated

May be OK



Concentrated



*A feed in general terms could be a WatchNext panel, Home page, or Shorts Player

Slide 6 Notes

Once you watch a few of these, your feed might become concentrated w/ a high volume of content that repeat the same message.

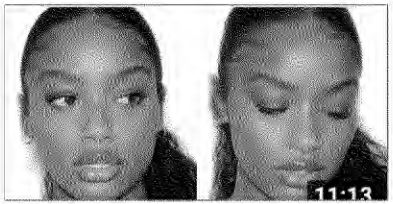
Example: Social Comparison video, which is OK on its own, but sometimes the Watch Next feed may have many more videos that repeatedly make negative social comparisons of physical features.

Video Watchpage: https://www.youtube.com/watch?v=SiTagRKUGYY

Not all videos from one genre are negative. We worked with T&S and developmental experts to objectively define PNIIV video attributes

Non-problematic

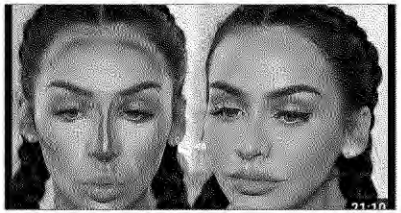
Neutral or positive videos highlight or enhance a natural feature, but not to look "more attractive"



Problematic in Volume

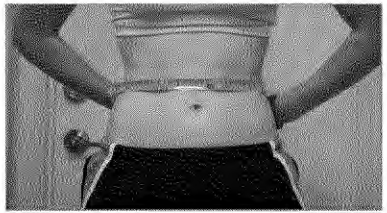
Negative Social Comparison videos encourage drastically altering physical features to obtain an idealized physical appearance by containing:

- ***Sharp contrasting imagery*** *where one appearance is judged to be "better"*
- ***Comparison commentary*** *on appearance attractiveness*
- ***Explicit calls to change*** *appearance for something "better" (eg. "do this to look hot")*



Problematic in 1 Video

Policy-violative videos show glorification or promotion of disorders.



Slide 7 Notes

We want to be able to differentiate videos in the same genre by identifying the objective attributes that make it encourage negative social comparison.

We're also collaborating with T&S and developmental experts to define these.

On the left, a video that highlights or enhances natural features but not necessarily to obtain an idealized appearance is neutral or positive

In the middle, a video that's problematic in volume encourages social comparison by containing:

1) Sharp contrasting imager,
2) Comparison commentary, OR
3) Explicit calls to change

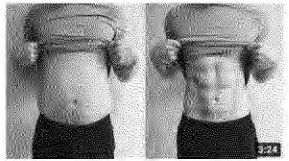
That encourage drastic alterations to physical features to obtain an idealized appearance.

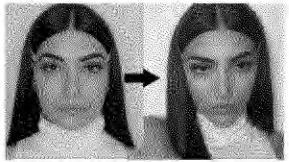
On the right, the most egregious video is policy violative when it shows glorification or promotion of eating disorders.

Top 3 categories of concern from developmental experts.

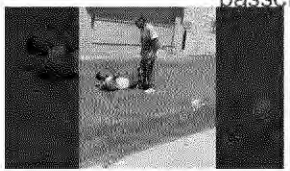
In volume, this content has **P**otential **N**egative **I**mpact (PNIIV) to teens & wellbeing

Negative Social Comparison
Encourage drastically altering physical features to obtain an idealized physical appearance.


Remove Fat in 2 WEEKS!...


SLIM YOUR FACE...

Social Aggression
Display realistic intense physical or non-physical aggression, including school altercations, road rage, and disruptive plane passengers.


Street Fight

Girl Fight on Cam...

Antisocial Behavior
Encourage humiliating others, such as name-calling, gossiping, spreading rumors, excluding from a group, and "stealing" friends.

Influencer being rude

SHE GOT DUMPED FOR THIS

Consulted with child development experts **globally**

UCI University of California, Irvine
Connected Learning Lab
WESTERN SYDNEY UNIVERSITY
CYBERBULLYING RESEARCH CENTER
UNIVERSITY OF AMSTERDAM
Ucla
Safer net
CENTER FOR SCHOLARS & STORYTELLERS
CcaM
TNSC
SUTD SINGAPORE UNIVERSITY OF TECHNOLOGY AND DESIGN
Department of Pediatrics University of Wisconsin School of Medicine and Public Health
THE WRIGHT INSTITUTE 1965

Slide 8 Notes

Negative Social Comparison isn't the only type of PNI. Child development experts have also identified other types of content problematic in volume.

social aggression, which is…

And anti-social behavior, which is…

The content types that are problematic in volume.

Literature review

These concerns have also been escalated in the news by parents & KOFs

Negative Social Comparison

The New York Times

A social media diet of perfect bodies is spurring some teenage boys to form "bigorexia"

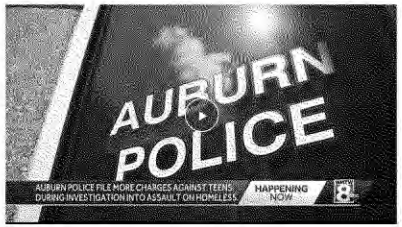
Canadian Broadcasting Corporation

Thousands of videos perpetuating an unrealistic standard…make you feel like you're the only person who isn't already "that girl"

Social Aggression

NBC15 Local News

Five teens facing charges for attacks on homeless. "The fact that they were going to capture this on video and then share this on social media played a big role."



Antisocial Behavior

EducationWeek

Students are behaving badly in class. Excessive screen time might be to blame.

CONFIDENTIAL

Privileged &

Slide 9 Notes

We've also seen many of these escalated in the news by parents & KOFs and there is an ongoing social listening study to quantify social buzz around this problematic content.

Our plan is to start by defining one of these types clearly,

Slide 9 Comments

1 [redacted] were you looking for negative headlines?
Assigned to [redacted]
[redacted] *10/18/2022 10:11 PM*

2 Update images
[redacted] *4/25/2022 03:02 PM*

3 skip this if short on time
Erin Turner, 5/2/2022 05:28 PM

Why Now? YT can do more to support teens and their wellbeing

1
5

From teen perception survey responses and the internal responsibility product audit, YT risks falling behind

Teen wellbeing & mental health are in "crisis"

U.S. Surgeon General Issues Advisor
Mental Health Crisis Further Exposed
Pandemic

Get off social media after a half hour and you might be happier

A new study recommends limiting your time on social media to around 30 minutes a day.

Increased regulatory scrutiny & legislation for tech companies

"platforms and other interactive digital service providers should be required to prioritize and ensure the health, safety and well-being of children"

YouTube

1 Source: Comparison on Youth Responsibility Product Audit
2 Source: Q4'21 Brand Health Tracker. Showing TB/T2B perceptions among weekly+ users of the platform, aged 14-17 years old.
3 US Surgeon General Issues Advisory on Youth Mental Health Crisis
4 Source: Whitehouse FACT SHEET President Biden to Announce Strategy to Address Our National Mental Health Crisis

How much of our feeds is concentrated on potentially negative impact content?

[redacted]%

of WN panels have high concentration of PNI*

[redacted]%

of Shorts Player feeds have high concentration of PNI**

Directional estimates based on [redacted]

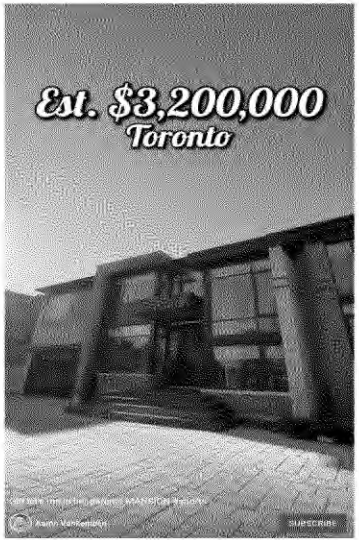
High concentration is [redacted]

Encouraging negative social comparison

Quotes from Experts

"Watching too many, someone may start thinking: "

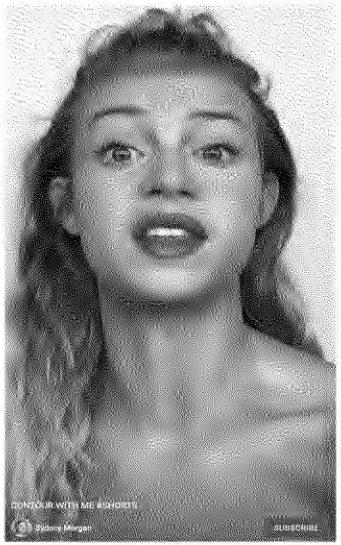
"Teens struggling with these issues "



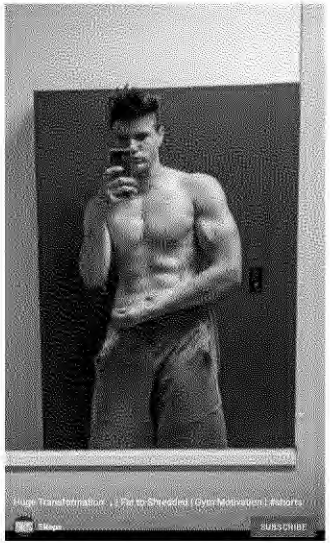
Girl lets me into her parents' MANSION
Female character lets narrator into her house to show off her parents' expensive mansion

Captain Bling Bling Is A Gentleman
Characters showing off all of the luxury gifts they purchased for their anniversary

How to Whiten Your Teeth
Character encourages getting whiter teeth using hydrogen peroxide.



CONTOUR WITH ME
Female character piles on makeup and contours her neckline and shoulders to look "muscular".



Huge Transformation | Fat to Shredded | Gym Motivation
Character shows scenes of himself at the gym and bulking

Privileged & Confidential

Slide 22 Notes

Let's take a look at some example categories that we've identified may be potentially negative in high volume due to teens' developmental characteristics. These are not definitive categories or comprehensive by any means, but are early examples for demonstrative purposes.

Like we mentioned before, a positive sense of self is vital because it shapes a teen's perception of belonging not just for their teen years but for most of their adult life

Thus, a high volume of content that encourages negative social comparison may establish or reaffirm negative or unrealistic norms during a formative time in teens' life when they are figuring out their own sense of self.

Here are some examples showing negative social comparisons of expensive mansions, excessive material possessions, and even altering physical features and ppearances.