AMENDED Exhibit 1032

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

depobook.com
EXHIBIT
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30(b)(6)

30(b)(6) Deposition Notes
re Underage (U-13) Account Detection for Adi Jain

TOPIC 1: "Defendants' efforts to detect and prevent unsupervised Children from using YouTube in the United States without parental consent in violation of Google's and YouTube's terms of service."

- "Children" means minors under the age of 13.

History of U13 Detection

- **2015 - Birthday Correction Flow (aka Suspected Underge Remediation Flow or "SURF")**
  - Google launches the birthday correction flow, which requires accounts suspected to be under the age of consent to (i) provide a government ID or credit card to verify their age; or (ii) their account will be deleted; BCF triggered by (i) declarations of U-13 birthdate in account settings; (ii) Athena detection (post-November 2019); (iii) other T&S detection.

- **Pre-2019 - Manual Detection of Suspected U-13 Accounts**
  - Trust & Safety (primarily Legal Ops) uses manual detection and human review to detect accounts suspected to be controlled by U-13 users.

- **~By April 2019 - Cyclops Launched for Livestream**
  - Cyclops classifier introduced to detect unsupervised minors in livestream and send to birthday correction flow

- **~2021 - Audubon**
  - YouTube begins the Audubon project, a cross-product effort to reduce the number of active accounts without a user–declared date of birth (also known as "age unknown" accounts). Audubon prompts the holders of legacy (existing) accounts lacking date of birth information to provide that information; if a user enters an under-AOC birthday, that would push the user into the birthday correction flow.

- **November 2019 - Athena Classifier (U.S.)**
  - YouTube launches the Athena classifier in the U.S., which uses machine learning to identify channels likely to be controlled by unsupervised, U-13 users and send them to birthday correction flow

- **August 2020 - Alaska and Patronus**
  - YouTube introduces the Alaska flow which adds an option in the birthday correction flow to set up parental supervision in lieu of age verification or account deletion; integrated with SupeX for YouTube access in 2021.

  - Patronus, also launched at this time, notifies the user that their account has been identified as suspected underage and they have a 14-day "grace period" to verify their age or set up parental supervision. Based on figures from September 2024, roughly 70% of users are terminated when they reach this flow; approximately 29% successfully age verify, and about 1% complete the parental supervision flow (~4% start the parental supervision flow but only 25% of those complete).

Ways Google/YouTube Help Parents Prevent Circumvention of Declared Age at Account Creation

- Parents can create accounts for their children (either Kids profiles or supervised accounts), ensuring the age is accurate.
- If a parent creates a supervised account through Family Link on Android devices and Chromebook, that would block the child from creating a "fake adult" account on the device.
- Users creating accounts are presented with an age-neutral screen providing blank boxes for the user's date of birth.
- Since approximately 2017, if a user entered an under-AOC birthdate in the account creation flow, a user is not able to push the "back" button to change their age to be over the age of consent; the flow would tell the user to get a parent to proceed.
- Additionally, on Android devices and Web, if a user enters an age that identifies them as a child, they will not be able to create an account with a higher age until two hours have passed. This protection has been in place since about 2016.

Post-Detection Flows & Terminology

- **Suspected U-13 Account Detected → Enters 14-day Grace Period**
  - **Patronus:** Refers to the flow and notification that users receive when their account is identified as suspected underage. The flow puts the account in a 14-day grace period, during which users have the options to:
    1. verify their age (through the **Birthday Correction Flow**),
    2. set up parental supervision (through the **Alaska/Griffin flow**),
    3. download their data (through TakeOut), or
    4. delete the account immediately.
  - **Birthday Correction Flow:** Requires accounts suspected to be under the age of consent to (i) provide a government ID or credit card to verify their age; or (ii) their account will be deleted.
  - **Alaska:** Initiative to enable users who are suspected to be under the age of consent to keep their Google account by allowing conversion of an unsupervised account into a supervised account; launched in September 2020, Alaska's integration with SupeX was introduced in March 2021.
    1. Results in a "**Griffin**" account, which refers to a U-13 account that was originally created as a standard unsupervised Google account, but was converted to a U-13 supervised account.
  - **Takeout**: A user-facing tool that gives users the ability to download data from an account even while it's age-disabled, before it's deleted.
- **After 14-day Grace Period → Reminder to User + Account Disabled**
  - The entire GAIA is disabled, preventing use of all Google products, including YouTube; videos uploaded to the channel are private and available only for viewing and take-out by the account holder.

- The user has **29 days** while in this "**age disabled**" state to complete the Birthday Correction Flow or Alaska/Griffin flow. If they fail to do either, their account will be deleted.

- **After 29 More Days → Entire Google Account Terminated**

Other Google Account Flows & Definitions

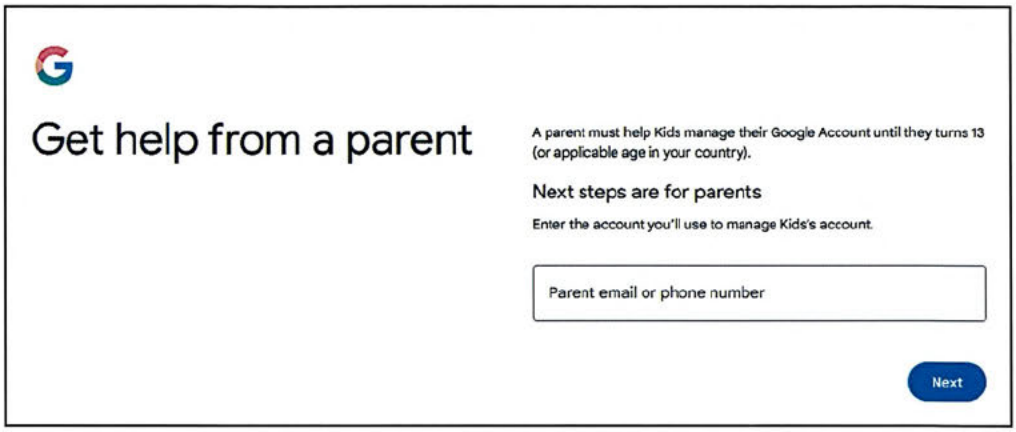
- **gTech Users and Products (gUP)**: Google team that supports manual government ID review for birthday corrections with the help of a vendor
- **Supervised Experience ("SupeX"):** an experience on YouTube Main that allows a parent to supervise and manage their under-AOC child's unicorn or griffin account on YT Main. Was designed and launched in 2021 to provide an additional age-appropriate experience for tweens who were aging out of YT Kids
- **Supervised accounts**: a Google account managed by parent/adult
  - **Geller:** Legacy Google account type that enables users over 13 to be supervised (at device/Google level). New Geller accounts have access to Teen Supervision since January 2025.
  - **Unicorn**: Google accounts for U-13 users that are created and supervised by a parent's/adult's Google account.
  - **Griffin**: See above.

Underage Account Detection Classifiers				
	Signals Considered	**Auto-Action Threshold (%)**	**Accounts Auto-Actioned Per Week**	**Other Notable Characteristics**
Athena V.1 (November 2019 - November 2020)	[redacted]	[redacted]	[redacted]	[redacted]
Athena V.2 (November 2020 – Feb 2021)	[redacted]	[redacted]	[redacted]	[redacted]
Athena V.3 (Feb 2021 – July 2021)	[redacted]	[redacted]	[redacted]	
Athena V.3 with Batch (July 2021 - April 2024)	[redacted]	[redacted]	[redacted]	
Athena V.3 Targeted (April 2024 - current)	[redacted]	[redacted]	[redacted]	[redacted]

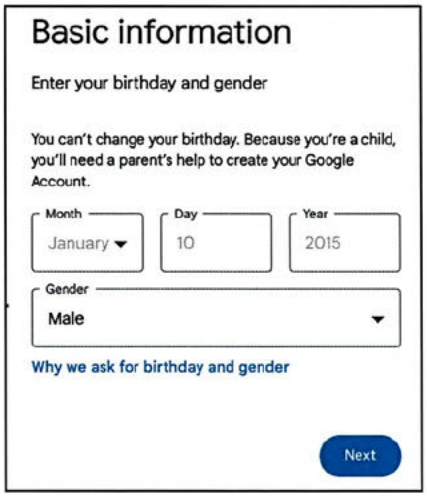
TOPIC 2: The ability of Children who initially enter a birthdate indicating they are under 13 years old to change their birthdate during the account creation process.

- [redacted]

  This is what the flow looks like in a web browser and in iOS as of March 13, 2025 when a youth enters an underage birthday then navigates forward (they will be sent to the parental supervision page):



  [redacted]



- [redacted] This protection has been in place since about 2016.

TOPIC 3: Whether Defendants provide any communication related to a user turning 13 years of age, when a previously underage (U-13) user in a supervised account setting reaches the declared age of 13 (***i.e.*, Graduation Flow)**

Graduation Flows

- The graduation flow has existed in some form for **all** unicorn accounts since 2017. Child accesses the flow via email.
- **Pre-September 2024**
  - **Notification:** Child and parent receive email notifications 30 days before, 7 days before, and on the day of the child's 13th birthday, advising them of the option to "update their account." The parent email will encourage a conversation with the child and provide a wealth of information and resources to the parent, including about how to set up ongoing supervision (through Geller), even if the child elects to graduate. *See* https://support.google.com/accounts/answer/1350409?sjid=2494345927965253801-NC
  - **User Options**
    - If the child takes no action, the account will remain a unicorn account and unicorn supervision would remain in place.
    - Alternatively, the child can elect to complete the graduation flow, which process would convert the unicorn account into a standard, unsupervised Google account.
  - **Parental Choices**
    - However, even if the child converts to an unsupervised account, the parent would have the option to convert the account to a Geller (supervised) account.
    - If a child completes the graduation flow, the parent will receive an email notifying them of the account change and providing links to resources, including the Geller supervision option.
- **Grad2Geller (Launched/rolled out globally July - September 2024)**
  - **Notification**: Same as above in terms of timing and information/resources for parents (30 days prior, 7 days prior, and at birthday). Minor changes to the notification to users for accuracy.
  - **13-15 Graduation Flow**:
    - If a user takes no action, the account will remain a unicorn account and unicorn supervision would remain in place.
    - Post-Grad2Geller, a child turning 13 "graduates" directly into a Geller account. No choice to create an unsupervised account for 13-15 year olds.
  - **16-17 Graduation Flow**: The graduation flow gives the child a neutral choice to either remain in Geller or convert to a regular Google account.
  - **Graduation 18+**: The graduation flow gives the child a choice to remain in Geller, but nudges the child to convert to an adult account.

FAQ - YouTube Potential Underage Accounts

Internal Only

Points of Contact:

- Legal Operations: [redacted]
- Legal Counsel: [redacted]
- TnS Product & Eng: [redacted]

What is YouTube's Underage Account policy?

In order to comply with [HYPERLINK "https://en.wikipedia.org/wiki/Children's_Online_Privacy_Protection_Act" \h] [Children's Online Privacy Protection Act], YouTube does not allow accounts to be owned by children under 13. To create a YouTube account, we require users to confirm that they are at least 13 years old. Users who enter any age younger than 13 will be prohibited from creating YouTube accounts.

Despite this, sometimes channels are reported to us in which [redacted]

If a user's channel is reported and, upon review, we determine that the account is controlled by a person who is under 13, we will terminate all Google accounts associated with that user (GAIA termination).

How do I report a potentially underage account?

If you come across potentially underage accounts, go to [HYPERLINK [redacted]] to report it. This will open an internal webform. You'll be asked to include information like:

- [redacted]
- [redacted]
- [redacted]
- [redacted]

If you are working on a sensitive escalation (eg. PERT), you can additionally send an email to [redacted] with the channel ID to expedite the process. You may also indicate in this email if you need follow up about if the account is terminated.

Where do underage account reviews come from?

1. Athena Classifier
    a. Underage Accounts classifier, launched November 2019
2. Child Safety Livestream Queue
    a. [redacted]
3. General Trust & Safety Internal Reports
    a. [redacted]
4. External Reports via Legal Webforms
    a. Sometimes adults will contact us via Other Legal or Privacy webforms notifying us that a child has an account and is underage

How are the underage account reports processed?

1 [redacted]
2. [redacted]

What notice is sent to potentially underage account owners?

We send the Canned Response YTA PUA, after which a user has 10 days to respond:

We have learned that the owner of this YouTube account may be under 13 years of age. As noted in our Terms of Service, YouTube is not intended for children under 13. Any accounts found to be controlled by individuals under 13 will be terminated.

Please respond to this email within 10 days if you are 13 or older, providing information so that we may verify your age as the owner of this account. Acceptable forms of age verification include an uploaded photo or scanned copy of your birth certificate, driver's license, passport, or any other government-issued identification.

If this account is controlled by the parent or guardian, please provide information so that we may verify your identity and age. Your response must include both 1) an uploaded photo or scanned copy of your birth certificate, driver's license, passport, or any other government-issued identification and 2) the following written statement: "I confirm that I am the legal guardian of this individual and I maintain control of this account."

If we do not hear from you within the following 10 days, we will assume you are under 13 years of age and will terminate your account accordingly.

What will the user experience be for a person whose account is disabled?

- User gets an in product notification upon logging in to their Google account.
- When user tries to sign in, they are redirected to [HYPERLINK [redacted]] instead.
- User will have 30 days to correct age via [HYPERLINK [redacted] \h] and then 15 days to go through identity escalation. After that the account is deleted.
- You can read more at this Help Center [HYPERLINK "https://support.google.com/accounts/answer/1333913" \h]

What's on the roadmap for the Underage operation?

- Developing a classifier to increase our detection of these accounts (Project Athena)
- Offering conversion to parent-controlled account (Project Alaska + Project Froyo)