

AMENDED Exhibit 1036

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

ATTORNEY-CLIENT PRIVILEGED & CONFIDENTIAL - seeking advice of counsel

YT Break Watch Reminder

[HYPERLINK ██████████] | ██████████ | Mar. 2018

Context/Rationale

Users have complained that they can be “sucked in” to YouTube, watching more than they initially wanted to. To help combat this, we can offer users the option to trigger an interruption in their watching, reminding them to take a break from watching YouTube every x minutes of playback time (configurable in settings). This is part of a broader digital wellness project at YouTube described at [HYPERLINK ██████████]

Scope

We'll target Android / iOS mobile (phones) YT Main apps only, available globally. This feature will be available for both logged in and logged out users. All break-related settings will be stored on a per-device basis.

Vertical Apps are not supported. Desktop, Tablet, mWeb Main Apps are not supported: the issues with digital wellness are most serious on mobile devices, and the native apps get the large majority of usage.

Milestone #1: Google I/O MVP

Success Criteria

We know we'll be ready for a launch at I/O if:

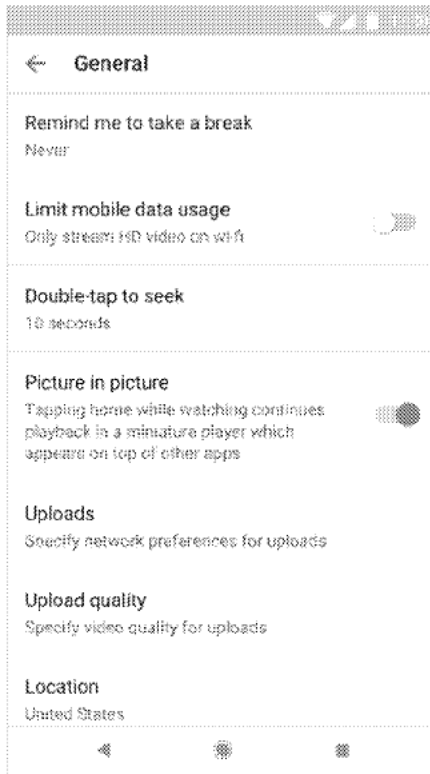
- Feature works, interrupts as specified above, no P1 bugs in defined [HYPERLINK \l ██████████]
- Fits in with PR / Marketing story in Google I/O

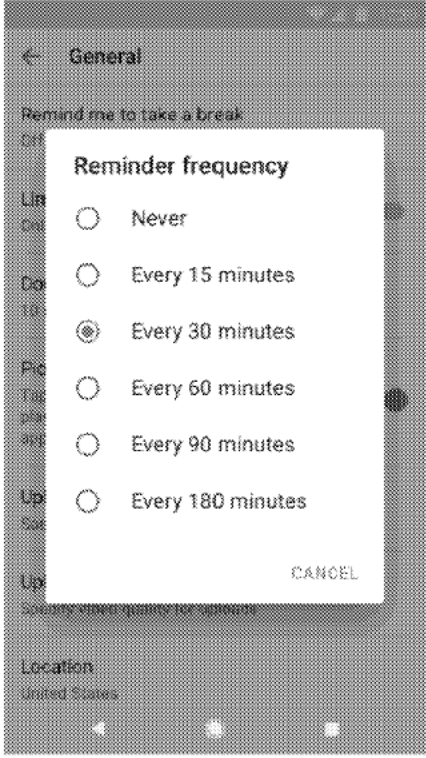
This is explicitly not a metrics driven launch. We're not concerned about the WT impact of introducing this feature for the I/O milestone.

Related docs

- *Copy doc has latest strings:* [HYPERLINK "██████████"] *Copy doc overrules any text below.*

Settings UI

To enable the interruption feature, users will need to go to the settings page in the "General" section (or be linked there via user edu). There, users can tap on "Remind me to take a break" to open a menu which allows users to choose whether or not the feature is enabled (default off) and if enabled how long the reminder is set for (default to off for the MVP). Note that changing this setting resets the [HYPERLINK II] ████████ to zero. These settings should be device level, filtered to specific accounts.	
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Once selected, users can choose from a fixed set of durations for the take a break timer.	 The screenshot shows a mobile application interface. At the top, there is a back arrow and the word 'General'. Below this, the text 'Remind me to take a break' is visible. A modal dialog box titled 'Reminder frequency' is centered on the screen. It contains six radio button options: 'Never', 'Every 15 minutes', 'Every 30 minutes' (which is selected), 'Every 60 minutes', 'Every 90 minutes', and 'Every 180 minutes'. A 'CANCEL' button is located at the bottom right of the dialog box. The background of the app is slightly dimmed, showing other settings like 'Location' and 'United States' at the bottom.
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Interruption UI

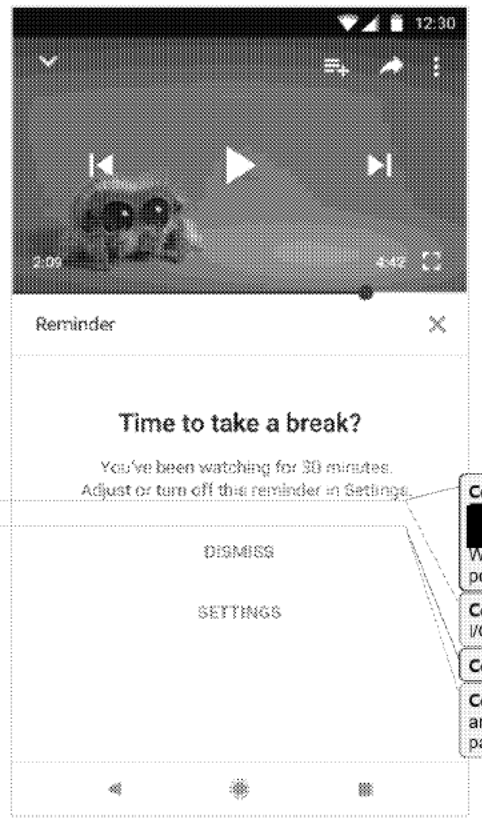
When the required amount of time has elapsed the video pauses and an Engagement Panel opens on the Watch Page showing the interruption message and a few options. This will open over any other Engagement Panels currently open.

Tapping "Dismiss" or the close icon dismisses the reminder and restarts playback.

Tapping "Settings" takes users to the setting page where Take a Break settings live. Closing the Engagement Panel resets the interruption timer

The interruption can trigger at any point during playback, including fullscreen, miniplayer and Picture-in-Picture (PiP). When it triggers, it will force the user into the portrait watch page and pause the video. When triggered in PiP, the video will pause and when the user returns to the app, the reminder panel will be open.

Spec with redlines: [[HYPERLINK](#)]



Commented [1]: [REDACTED]

What about VR? Should we force the phone into portrait and display the reminder?

Commented [2]: Ideally yes, but it's not a p0 for the I/O MVP.

Commented [3]: Should we trigger in PiP playback?

Commented [4]: Yes, it should pause PiP playback and when the user returns to the app, the reminder panel will be open.

Signed out users

Users that are signed out will still be able to use the take a break reminder feature and can manage the feature settings via the usual flow (see animation to the right). Since the Time Watched page is not available for signed out users, they will not have the additional entry point to manage this setting from that page.	
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Measuring time

Our definition of time is critical here: it needs to update quickly and correspond to a user's definition of time spent watching, regardless of things like despamming and non-view playbacks.

We'll keep a client side timer which tracks how long a user has been watching consecutively, defined as follows:

- The time starts when:
 - Video playback starts for a user who has enabled the setting on the device

- NOTE: we explicitly do not want to include viewtime from the inline player including Reactr and Inline Muted
 - NOTE: live WT is treated the same as normal WT, and interrupts can trigger on live videos
 -
- The timer is paused when video playback stops for any reason, including but not limited to:
 - The user pauses a video
 - The user dismisses a miniplayer
 - NOTE: ad playback time is treated the exact same as normal playback time
- The timer resets to zero when:
 - The timer is paused for longer than 30 consecutive minutes
 - The timer threshold is reached
 - The user chooses a new threshold
 - The user logs out of the account
 - The user closes the app
 - The user force quits the app
 - The user restarts the device
 - The app crashes
- The time is disabled when:
 - The user turns off the setting
 - The user deletes the app from the device

Success Metrics and Launch Criteria

- We expect low adoption since the feature is opt-in.
 - We may see a spike due to I/O marketing.
 - We only expect a subset of users with frequent long watch sessions to be repeat users.
 - Even with aggressive marketing campaigns, we don't expect high usage.
- We will not run a % experiment prior to rollout.

To monitor adoption / success of the feature in the short term:

- # of users who enable the interruption (in a given day)
 - GEL event: [HYPERLINK]
- # of users who select each threshold (in a given day)
 - GEL event: [HYPERLINK]
- CTR for buttons in the engagement panel
 - Reminder panel VE: WatchBreakRenderer (50638)
 - Dismiss button VE: WatchBreakDismissButton (51703)

Commented [5]: What about inline non-muted, e.g. Reactr?

Commented [6]: [REDACTED]

I think we should count viewtime for Reactr videos (it shows up in watch history). Thoughts?

Commented [7]: I'd like to include it, but will we be able to trigger the interruption in Reactr? I don't think we'll have a Watch Page to trigger the interruption on.

If we can't trigger the interruption on Reactr I don't think that WT should count (and we can call it out as a limitation in the HC article)

Commented [8]: [REDACTED] FYI

We can't trigger the interruption in Reactr. I'll exclude all inline playback from WT.

Commented [9]: [REDACTED] FYI, Reactr watch time will be excluded from the YT Break Reminder

Commented [10]: SGTM, thanks for the heads-up. We can consider it later but since there aren't really any easy video trails in the chat itself I doubt it would even trigger very much.

Commented [11]: Thinking about Reactr, do those notifications buzz the phone or are they silent? And if buzz, will they also be silenced during quiet hours?

Commented [12]: + [REDACTED]

Commented [13]: Yes, the plan is that Quiet Hours would apply to reactr too. Notif team is currently experimenting to understand the impact of the planned ...

Commented [14]: ack thanks

Commented [15]: Given (a) user expectations around the behavior of direct messaging in general (notification is fast and loud unless recipient has manually turned ...

Commented [16]: +1 to [REDACTED] suggestion. I would phrase this in a similar way to Center for Humane Technology "Turn off all notifications except from ...

Commented [17]: TODO: tie to visits / sessions naming wise, be clear about what this does

Commented [18]: Since I think the setting will be purely client side, there won't be any account or watchtime based correlation.

Commented [19]: Let's avoid doing goofy stuff. Clarified that we only care about raw # of users in a given day, since that's easier to log.

Commented [20]: Thanks Reid. [REDACTED] to comment on these logging needs.

- Settings button VE: WatchBreakSettingsButton (51704)
- User happiness?

Commented [21]: [REDACTED] FYI, populated the GELs and VEs for metrics.

Core business monitoring:

- Post launch, we'll monitor WatchTime, YouTubeTime, DAVs, Ad views (measured in 1% holdback). If we see metrics drop that are higher than we would expect given observed opt-in rates we'll investigate for a root cause.

Quality: We'll measure quality and polish through testing:

- Dogfood complete, no P0/P1 issues identified with core flows
- UX review + Signoff
- Test plan complete with Manual QA signoff

Launch plan

We're committed to delivering this MVP feature launched by Google I/O in order to support a Google-wide push taking a strong stance on digital wellness across our products, including YT, Android, and Unicorn. Our timeline is as follows:

- Formal kickoff date:** 2018-03-19
- String freeze:** 2018-03-23
- Feature complete target:** 2018-04-12 (3.5 weeks from kickoff, deadline to begin a dogfood)
- Soft branch cut deadline (v.13.15):** 2018-04-19 (4.5 weeks from kickoff)
- Hard branch cut deadline (v.13.16):** 2018-04-26 (5.5 weeks from kickoff)
- Google I/O (Begin rollout):** 2018-05-08

Test cases

TODO / ETA: 3/30

Privacy considerations

Privacy implications for the Google I/O milestone:

- Time spent won't be exposed to the user in settings before they receive an interruption. Feature will only be available via an opt-in setting and the interruption UI will provide a direct link to opt-out again.
- The client-side timer does not persist across devices or accounts. The timer is stored client-side <add info about how this will be handled>
- The reminder setting selection does not persist across devices or accounts.

Engineering questions

- Is it possible to make this work with cast? If not, what is the experience?
- Is it possible to make this work with offline? If not, what is the experience?

- Resolved: this will not work offline, and we'll call that out as an explicit limitation in the HC. Offline WT will not count towards the timer.
- Will we have any problems with time zone changes?
 - Resolved: No

Fast Follows

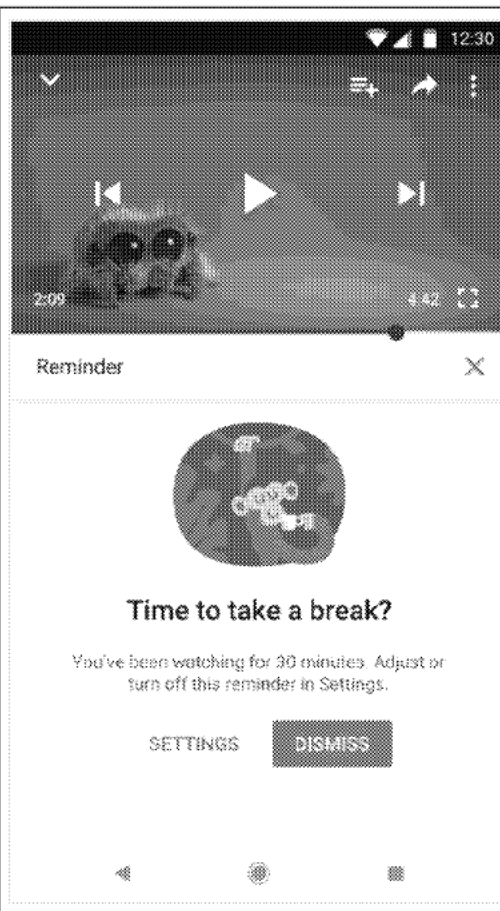
Add an illustration to reminder panel

The addition of an illustration in the reminder panel will help communicate the message while reflecting our brand voice. Dismiss and Settings are positioned horizontally side-by-side to minimize scrolling on small screens.

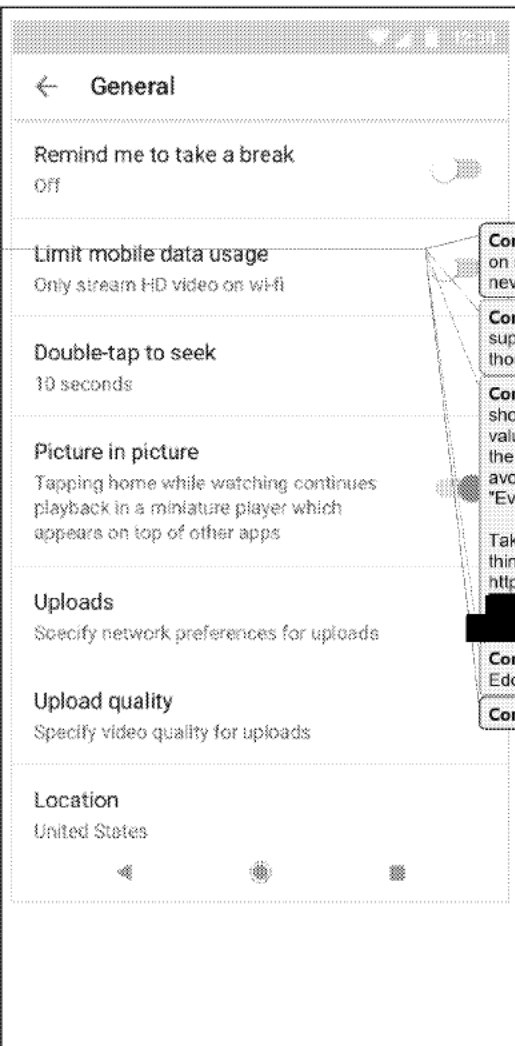
See UX spec and redlines at [HYPERLINK

- [HYPERLINK

- [HYPERLINK



Toggle switch for reminder setting

The current state is shown below the title (OFF by default). When the switch toggle is OFF: - Tapping anywhere in the reminder setting box (including the switch) toggles the setting ON and opens the custom reminder frequency dialog. - Tapping CANCEL in the dialog at this point will turn the setting OFF When the switch toggle is ON: - Tapping the switch toggle turns the setting OFF. - Tapping anywhere else in the setting box (besides the switch toggle) keeps the setting ON and opens the reminder frequency dialog. - If the user taps CANCEL in the dialog at this point, the setting will remain ON and the value will not change. - When the user toggles the setting ON for the first time, the reminder frequency dialog opens with the default value 1h15m. - Once the user selects a value, if they turn the setting off and back on, the value should be set to their previous value (i.e. remains stateful – does not return back to the default value) Once a user toggles the switch on, the reminder frequency defaults to [XX]. Tapping in the box opens a dialog to select a different time interval. If a user taps in the box when the toggle is off, it will turn the toggle on and open the frequency dialog.	
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Commented [22]: Should explicitly tapping the switch on show the dialog only if a custom frequency has never been set?

Commented [23]: [REDACTED] I suppose we could just default on to 75 minutes. Eddie, thoughts?

Commented [24]: I think it makes sense to always to show the dialog, even once the user has set a custom value in the past. I have concerns the user will forget the setting is customizable in the future and want to avoid putting below the setting title something like "Every 30 minutes. Tap to customize"

Take a look at an example I put together and lmk if you think this makes sense:
[https://docs.google.com/\[REDACTED\]](https://docs.google.com/[REDACTED])

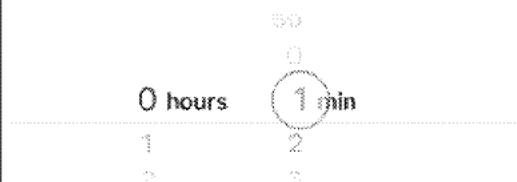
Commented [25]: That makes sense to me, thanks Eddie.

Commented [26]: SGTm. Thanks!

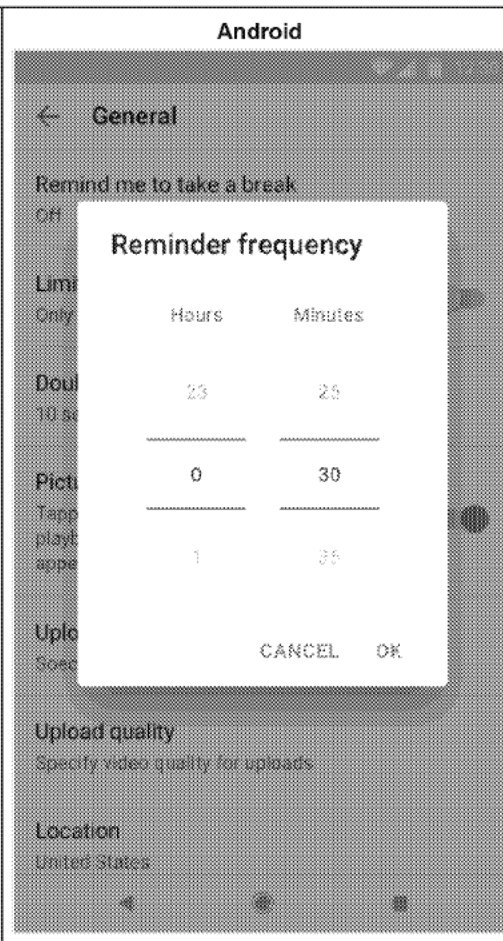
Replace specified time intervals with custom time picker

Users can specify a custom time interval instead of choosing from a fixed set of values. Once a user toggles the switch on, the reminder frequency defaults to 1 hr 15 min. Minute intervals increase by 5 (0, 5, 10, etc.)

We should not allow the user to select a frequency 0 minutes. When the hours value is set to 0 and the user slides the minutes value to 0 and releases, the minutes value moves to 5, similar to this example:

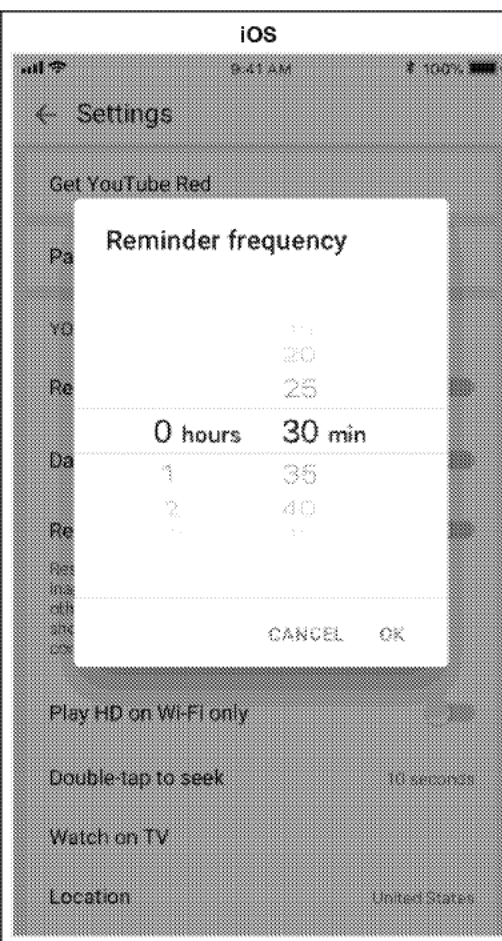
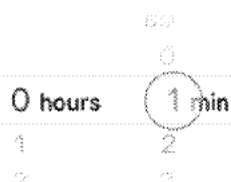


Android: Uses the [[HYPERLINK](https://developer.android.com/reference/android/widget/NumberPicker.html) "https://developer.android.com/reference/android/widget/NumberPicker.html" \h] (similar implementation to [[HYPERLINK](#)

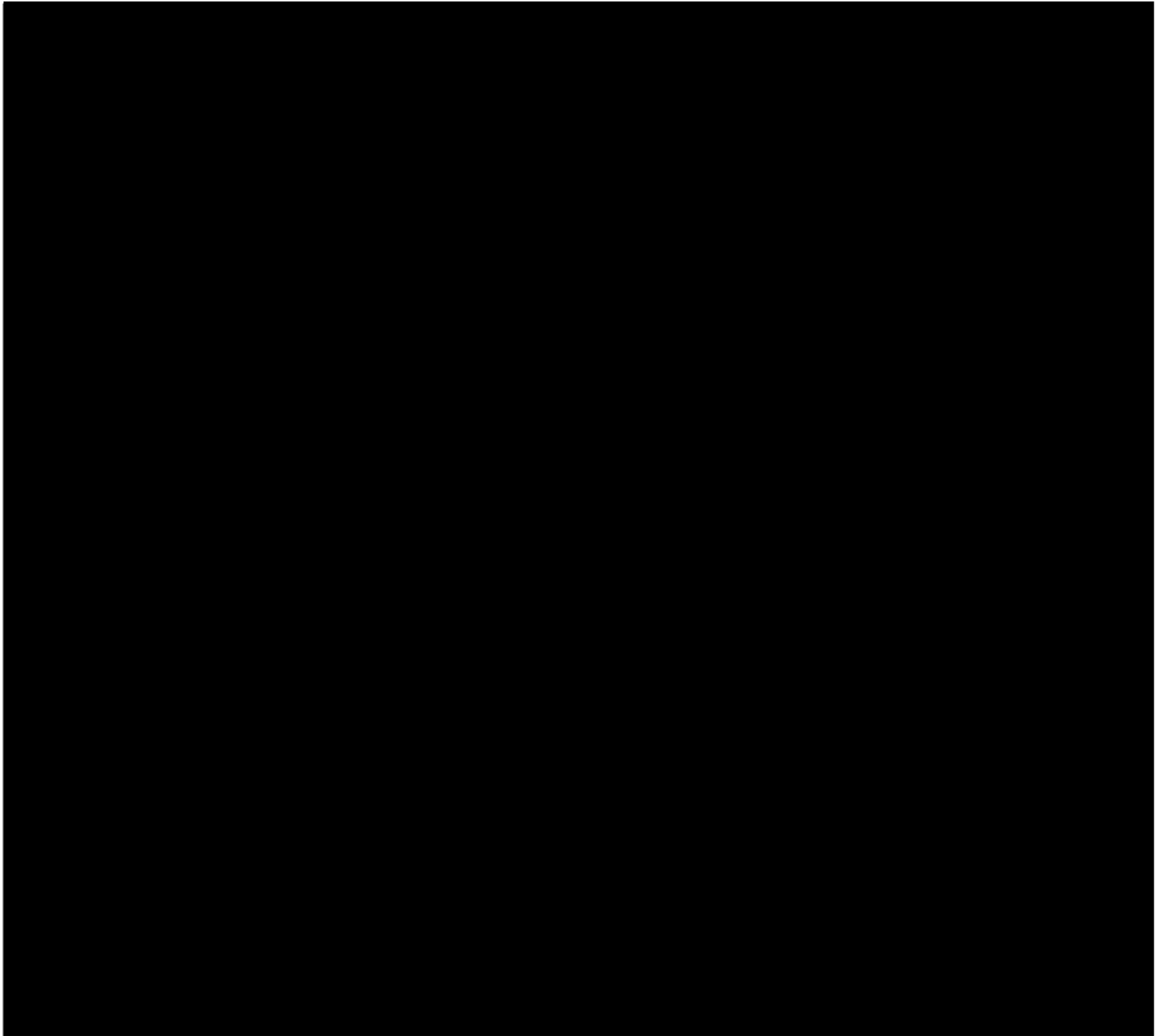


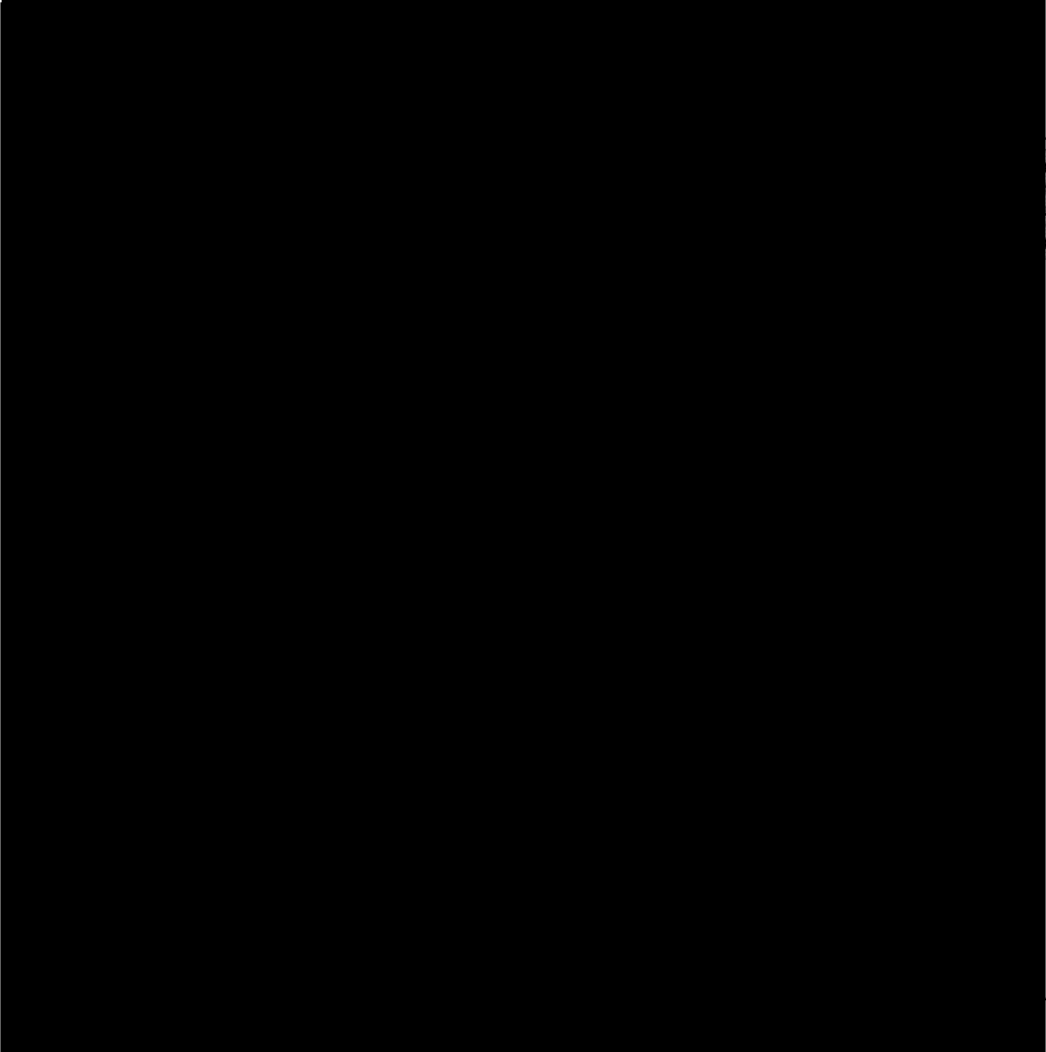
iOS: Uses the [[HYPERLINK](https://developer.apple.com/ios/human-interface-guidelines/controls/pickers/) "https://developer.apple.com/ios/human-interface-guidelines/controls/pickers/" \h].

We should not allow the user to select a frequency 0 minutes. When the hours value is set to 0 and the user slides the minutes value to 0 and releases, the minutes value moves to 5, similar to this example:



Other options considered (not in scope)





Commented [36]: Let's work together on the copy here - I worry that this sounds a little judgmental of our users

Commented [37]: SG. [REDACTED] FYI