AMENDED Exhibit 1037

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

Produced in Native

PRIVILEGED

March 4, 2022

Youth Working Group Review

YouTube

3 wellbeing concerns highlighted by parents, experts and youth

1

PROBLEMATIC CONTENT

Non-violative content with potentially negative impact in high volume

[redacted]

2

HABITUAL HEAVY USE

Endless scrolling and unintentional consumption

Take a break, daily limits, [redacted]

3

RISKY PARTICIPATION

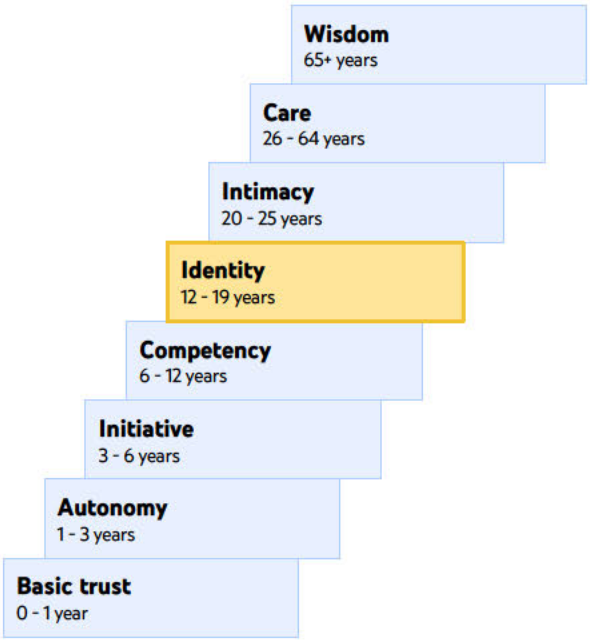
Youth putting themselves at risk when participating in YT Community

[redacted]

On digging in we've found 3 key concerns highlighted by parents experts and youth - first problematic content, that does not necessarily violate policy but when consumed in high frequency can be detrimental, second habitual heavy use - i.e. endless scrolling and unintentional consumption and third which will begin to play a larger part as we launch [redacted] - risky particpiation

Teen Identity is fluid

Teens want to establish their identity and understand who they are.



Erikson's Stages of Development, 1982

Most unique thing about teens & tweens is their identity development

1. **Sense of identity is still in formative stages**. External cues have stronger influence on them.

Similar to younger kids

1. **Self-regulation is still not as developed**, so they are less able to moderate in the reflect when they're watching thrill-seeking content
2. **Less able to put things in context** compared to adults and are more susceptible to performatory videos.

APPENDIX

Proprietary & Confidential

Teens & Tweens are in a unique developmental stage

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Owls Notes:
https://docs.google.com/[redacted]
On of the themes you've heard us talk about before is younger kids have lower levels of self-regulation, and that's still an issue for teens and tweens.

Slide 1

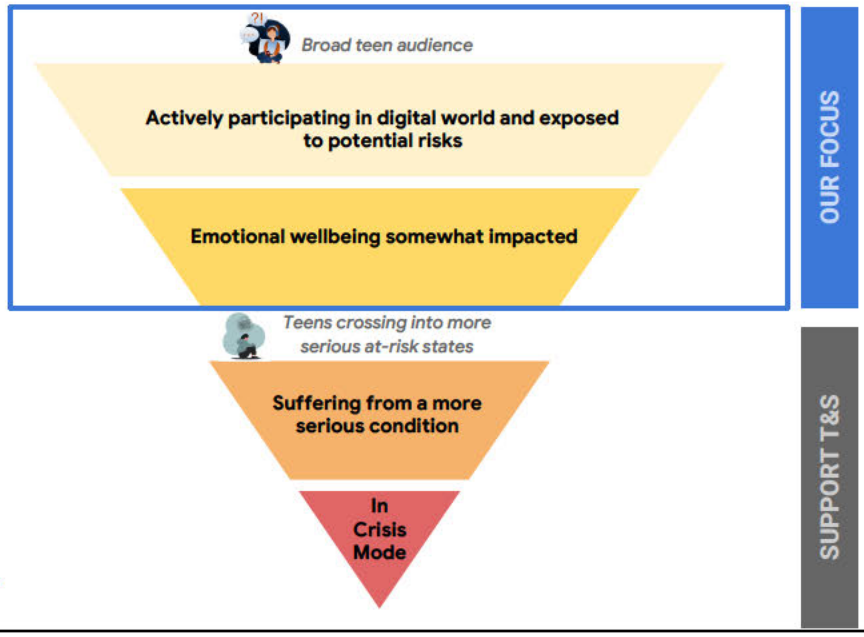
5 this is great but too dense. suggest making a copy in appendix and cutting this down. i like the visual.
Erin Turner; 3/8/2022 8:05:57 PM

6 [redacted]
Erin Turner; 3/8/2022 8:05:57 PM

Teens & Tweens are in a unique developmental stage

1. **Sense of identity is still in formative stages.** Teen identity develops as teens try out different roles and attitudes in different settings. A positive teen self-identity is vital because it shapes a teen's perception of belonging for teen years and most of adult life.
2. **External cues have stronger influence** on teens and they can take external cues from what they see online. Inundation of the same cues from online content can greatly influence their identity development.
3. **Self-regulation is not as developed** in their prefrontal cortex, so they are less able to moderate and self-reflect in the moment.
4. Teens are **less able to put things in context** compared to adults
5. **Thrill-seeking content are more appealing to teens** than adults, such as content with shock factor, "look at me" attitude, and para-social connections (relating/creating relationships with an influencer from watching them)

Owls Notes:
https://docs.google.com[redacted]

Today YT has a gap in supporting top of the wellbeing funnel

Problem: Elevated viewing of certain content can potentially negatively impact (PNI) their wellbeing