

AMENDED Exhibit 1042

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

CONFIDENTIAL

Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION/)
PERSONAL INJURY PRODUCTS) MDL No. 3047
LIABILITY LITIGATION)
)
)

CONFIDENTIAL - ATTORNEYS' EYES ONLY
PURSUANT TO PROTECTIVE ORDER
VIDEO-RECORDED

30(b)(1)

DEPOSITION OF JOHN HEBDA
(Pages 1 - 239)

Held at Wilson Sonsini Goodrich & Rosati
One Market, Spear Street Tower
San Francisco, California
Wednesday, March 19, 2025, 9:22 a.m.

- - - -

REPORTED BY: ELAINA BULDA-JONES, CSR 11720

CONFIDENTIAL

Page 7

1 THE VIDEOGRAPHER: Good morning. We are
2 now on the record. My name is Miguel Concepcion and
3 I'm a videographer for Golkow.

4 Today's date is March 19th, 2025, and the
5 time is 9:22 a.m. Pacific time. 0

6 This deposition is being held at Wilson
7 Sonsini in San Francisco, California, in Re: Social
8 Media Adolescent Addiction/Personal Injury Products
9 Liability Litigation for the United States District
10 Court, Northern District of California.

11 The deponent is John Hebda in his 30(b)(1)
12 capacity.

13 Remote counsel will be noted on the
14 stenographic record.

15 Will in-person counsel introduce
16 themselves beginning with the questioning attorney.

17 MS. CONROY: Good morning, Mr. Hebda.

18 Jayne Conroy for the plaintiffs.

19 MS. HURD: Ellyn Hurd for the plaintiffs.

20 MS. TRUONG: An Truong for the plaintiffs.

21 MS. HARDIN: Ashley Hardin on behalf of
22 the Google defendants and the witness.

23 MS. YOUNG: Sophia Young on behalf of
24 Google and YouTube.

25 MR. KRAMER: Andrew Kramer on behalf of

CONFIDENTIAL

Page 8

1 Google and YouTube.

2 MS. NELSON: Jordan Nelson from Google.

3 THE VIDEOGRAPHER: Thank you.

4 After the court reporter introduces
5 herself, she will swear in the witness.

6 THE REPORTER: I am Elaina Bulda-Jones.
7 My CSR Number is 11720. I will be your reporter for
8 today.

9 JOHN HEBDA,
10 called as a witness by the Plaintiffs herein, being
11 first duly sworn by the Certified Shorthand Reporter
12 was thereupon examined and testified as is
13 hereinafter set forth.

14 EXAMINATION

15 BY MS. CONROY:

16 Q. Good morning, Mr. Hebda.

17 A. Good morning.

18 Q. Have you ever had your deposition taken
19 before?

20 A. I have not. This is my first time.

21 Q. Okay. Well, it's painless.

22 A. Thank you.

23 Q. Really, the ground rules are try and wait
24 for me to finish my question before you answer it.
25 That's for Elaina's benefit so she doesn't try and

CONFIDENTIAL

Page 9

1 figure out what both of us are saying at the same
2 time, although she likely can.

3 Also, if you need to take a break just let
4 me know or your counsel know. And the only thing I
5 ask is that we not take a break between a question
6 and an answer, okay?

7 A. Okay.

8 Q. So generally that's it.

9 If I ask a question, if you don't
10 understand it but you still answer it, I'm going to
11 assume you did understand it, so...

12 Otherwise, I think that's about it.

13 So let me ask you, where do you live?

14 A. I live in Oakland, California.

15 Q. Okay. So nearby?

16 A. Very nearby, yes.

17 Q. Okay. And have you ever read the
18 complaint in this case? Do you know what a
19 complaint is?

20 A. I'm not familiar with the legal term
21 "complaint." I can assume what it is but I'm not
22 familiar with exactly what it is and I had -- I saw
23 it. I don't believe I've read it.

24 Q. Okay. And did you -- are you represented
25 here today by anyone?

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Page 10

1 A. I am.

2 Q. Okay. By Ms. Hardin?

3 A. By Ms. Hardin.

4 Q. Okay. And have you met with Ms. Hardin in
5 preparation for this deposition?

6 A. I have.

7 Q. On how many occasions?

8 A. Three occasions.

9 Q. And were those in person or Zoom or
10 telephone conference?

11 A. Two in person and one via
12 teleconference -- or -- well -- Google Meet.

13 Q. Okay. That's right. I have learned --

14 A. Yeah.

15 Q. -- in these depositions.

16 A. We don't use Zoom.

17 Q. That's right. I have to -- yeah. So
18 forgive me already.

19 A. No, it's okay.

20 Q. I will mess that up.

21 Okay. What is your -- what is your role?
22 What's your job?

23 A. I work at YouTube and I'm the senior
24 director of product operations, claims, and
25 compliance.

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Page 11

1 Q. And how long have you held that title?

2 A. Since 2016.

3 Q. And where is your office located?

4 A. San Bruno, California.

5 Q. And do you go there every day or do you
6 have a -- some remote or do you travel? What's your
7 general work life?

8 A. We -- I'm in the office -- or I'm in
9 California most of the time. I travel occasionally.
10 So last week, for example, I was in New York.

11 We have a hybrid work schedule at Google.

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 MS. CONROY: Let me mark as an exhibit
16 your LinkedIn profile. It might be a little bit
17 easier. We don't have to remember dates and things.

18 THE WITNESS: Sure.

19 (Whereupon, Google-YouTube Hebda Exhibit 1
20 was marked for identification.)

21 MS. CONROY: We'll mark that as Exhibit 1.

22 Q. And you see there it says "John Hebda,
23 Senior Director, Product Strategy & Operations,
24 Claims, and Compliance," at YouTube.

25 That's what you just told me --

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Page 12

1 A. Yes.

2 Q. -- your current title is.

3 And so this is -- is this Exhibit 1
4 LinkedIn profile current, to the best of your
5 knowledge?

6 A. It is, yes.

7 Q. Okay. If we could -- you have listed here
8 "Experience YouTube" for 11 years.

9 Do you see that?

10 A. Yes.

11 Q. Could you give me just an overview of how
12 you came to be at YouTube back 11 years ago?

13 A. Sure.

14 I was a consultant in the early part of my
15 career and I joined Google in 2012 on a central
16 strategy and operations team that supported Google's
17 chief business officer at the time.

18 And in 2014, the chief business officer
19 left to go join a different company, and I was
20 thinking about what I wanted to do in my own career
21 at Google. And at -- I knew at some point -- my
22 intention of coming to Google was to get deeper into
23 one of the products or business units.

24 And I was approached by a colleague of
25 mine with an opportunity at YouTube to be the chief

CONFIDENTIAL

Page 13

1 of staff for -- at the time their head of
2 engineering and the CEO. And it sounded like an
3 interesting opportunity.

4 So I had a few conversations, one thing
5 led to another, and then in 2014, I joined YouTube
6 in that capacity in October I believe that year.

7 Q. Okay. What kind of -- can you give me a
8 brief description of what you did at -- while you
9 were at Google and with Google Sheets, what was your
10 role or what were your responsibilities?

11 A. Sure.

12 So I didn't -- I didn't work actually with
13 Google Sheets or any of the individual products. I
14 worked in -- in a part of the organization we call
15 the global business organization. And that was the
16 part of the organization that included the
17 many-thousand-person sales teams, the marketing
18 teams, and I believe at the time our partnership
19 teams as well, so the folks who work on partnerships
20 with other companies that partner with Google.

21 And my role was a few things. First was
22 to help manage the goal setting for that part of the
23 organization.

24 Second was to help manage some of the
25 performance management and monitoring for that part

CONFIDENTIAL

Page 14

1 of the organization. So every week our chief
2 business officer had to go tell Larry Page, the CEO
3 at the time, how revenue was performing. Were we
4 meeting our targets, falling short of our targets,
5 if -- you know, if we were meeting or exceeding or
6 falling short, why, what was driving that. And so
7 we helped analyze all of that and help prepare the
8 chief business officer for those.

9 And then we also led and executed a number
10 of projects related to improving overall
11 effectiveness of the organization. And that could
12 mean finding ways to improve advertising sales in
13 certain regions of the world. It could mean
14 figuring out ways to better set up the organization
15 for success.

16 Q. Okay. And so would it be fair to say, in
17 effect, you sort of helped structure the goal
18 setting?

19 A. We --

20 MS. HARDIN: Objection to form.

21 You may answer.

22 THE WITNESS: We ran the process. So
23 the -- the individuals in the business unit, so the
24 sales and advertising leaders or the partnerships
25 leaders or the marketing leaders, they were

CONFIDENTIAL

Page 15

1 ultimately the ones who owned and were accountable
2 for structuring the goals, determining which goals
3 were the top priorities, et cetera.

4 BY MS. CONROY:

5 Q. And when you -- when you started there,
6 did you help to design that -- the process at all or
7 was it already in place?

8 A. When I started -- Google has had a
9 goal-setting process, I think since -- it was
10 created a long time ago, that was actually instilled
11 upon by one of the folks on the advisory board, John
12 Doerr, so it was very much in place, it was
13 well-running.

14 And my -- my boss at the time, or my
15 manager, had been running it within this
16 organization and had made some tweaks along the way
17 but it was -- it was very much running and I helped
18 manage a lot of the day-to-day work.

19 Q. Okay. And then you went to YouTube in
20 2014; is that what you said, October 2014?

21 A. That's correct.

22 Q. And could you describe for me what your
23 responsibilities were there at YouTube?

24 A. So --

25 Q. When you started.

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Page 16

1 A. Sure.

2 When I started at YouTube -- I'll set a
3 little bit of context just to help.

4 Susan Wojcicki, who was one of the early
5 Google leaders, she had just taken over as YouTube
6 CEO I think four or five months prior to me starting
7 there. And part of Susan taking over YouTube was to
8 help really bring it to the next phase of its life.

9 It was a relatively young company at the
10 time that still had a lot of the both employees but
11 also processes from its startup days, which were
12 great as YouTube was growing in its infancy but
13 maybe not as robust as some of the processes in
14 Google work at the time.

15 And so in my early days, I did a couple
16 things as the chief of staff. I helped run a lot of
17 the big decision-making meetings at YouTube. So I
18 helped create some structure behind what we call
19 product reviews, helped manage the agendas for
20 those, which topics would come to product reviews
21 for decision meetings.

22 I helped run and put more structure into
23 the goal setting and OKR process at the time.

24 Q. Let's just slow you down because --

25 A. Sure.

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Page 17

1 Q. -- just for the jury's sake.

2 OKR. What does that mean?

3 A. Oh, excuse me. I'm sorry.

4 OKR. It stands for objectives --
5 objective and key results. And it's -- it's a
6 Google term. Actually, I think it's now widely
7 known in the industry. But it effectively means
8 goals. So most companies, or hopefully all
9 companies, set goals of some fashion. And OKR is
10 just Google's -- the term Google uses to describe
11 the goals that we set for our teams, our company,
12 our business units, and our employees.

13 Q. Okay. And so when you started, were you
14 sort of bringing some of that goal-setting process
15 from your experience at Google to YouTube?

16 A. That's correct.

17 Q. Okay. And were you able to do that?

18 A. We were.

19 Q. Okay. How long did it take you?

20 MS. HARDIN: Objection to form.

21 THE WITNESS: That's a good question.

22 It took a few years. When I first came to
23 YouTube, there were many different goals reviewed in
24 different places. And it took a few years to bring
25 more structure to it so that it was both as rigorous

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Page 18

1 as we wanted it to be and as clear as we wanted it
2 to be so the organization understood what the
3 different goals were in the organization, which ones
4 were more important than others.

5 BY MS. CONROY:

6 Q. Okay. I see you were chief of staff. So
7 you were -- I'm sure you had other responsibilities.
8 But you were putting those processes in place from
9 2014 to 2016; is that fair?

10 A. Yes.

11 Q. Okay. Then you became director of product
12 strategy and operations.

13 Was that a promotion?

14 A. It wasn't a direct promotion, no. I
15 stayed at the same job level. It was a slightly --
16 it was a slight shift or evolution in
17 responsibilities, I would say.

18 Q. Okay. And how did your responsibilities
19 change or shift?

20 A. Yeah. So at that time, I was the only
21 person at YouTube in a strategy and operations role
22 supporting our product and engineering and design
23 teams. And when Susan, the CEO, came in I think she
24 realized that there was a need for more support in
25 this area. And other Google teams had more

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Page 19

1 built-out functions that helped support the
2 organization in these capacities.

3 And so at the same time, there were a lot
4 of -- there was a lot of leadership change at
5 YouTube. So eventually, our head of product was
6 hired, Neal Mohan, who is now the CEO. With Neal
7 came a woman, Jenny Flannery O'Connor, who was a bit
8 more senior than I was, and she -- she set out to
9 build -- build more structure and build an actual
10 team for this function, product strategy and
11 operations.

12 And I was appointed to lead part of that
13 team and I started building out a team effectively
14 from scratch into what is the team I lead now.

15 Q. And how would you describe that team that
16 you were asked to build out and that you now lead?

17 A. Yeah. So I can tell -- I'll tell you what
18 I do now. And you can tell me if you want me to go
19 deeper in any place.

20 But the team has -- that part of the team
21 has three functions. The first is that we support
22 our product engineering and design leaders in what I
23 call setting their near-term strategy, which means
24 effectively in 12 months where do we want to be in
25 this part of YouTube. How do we measure success.

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Page 20

1 So what are the things that we would want to measure
2 in order to know if we have gotten there. And more
3 tactically, what does that mean in terms of goals.
4 So we support them in setting their goals for their
5 parts of the organization.

6 The second thing we do is help monitor
7 their performance. So day in, day out, week in,
8 week out, we help stay on top of how different
9 metrics and goals are performing. Are we on track,
10 are we not on track. If we're not on track, why,
11 what's driving that.

12 And then the third part of what that team
13 does is lead a number of projects, often analytical
14 in nature and often in partnership with data
15 scientists or others in the organization, to help
16 improve our business in various areas.

17 And "improve" can mean a lot of things.
18 It could mean reducing churn on our subscription
19 products. It could mean improving the amount of
20 violative content we catch.

21 And so we do a lot of analysis to help our
22 product and engineering leaders build the things
23 they need to build to improve our products so we can
24 deliver more value to users.

25 Q. Would that -- when you say "improve

CONFIDENTIAL

Page 21

1 business," could that also include improving
2 revenue?

3 MS. HARDIN: Objection to form.

4 THE WITNESS: Typically, no. We -- most
5 of the revenue analysis at Google is done within our
6 ads and sales team. So in my prior role when I was
7 in a central Google team, we did -- my team did some
8 of that work.

9 But with -- within YouTube, nearly all of
10 our analytical work is focused on the product
11 itself, things like user engagement, creator
12 engagement.

13 BY MS. CONROY:

14 Q. Is any of it focused on revenue?

15 MS. HARDIN: Objection to form.

16 THE WITNESS: Some -- we partner with our
17 advertising teams in some cases on some projects
18 that involve revenue. But we -- to my knowledge, we
19 haven't done anything definitely in the last few
20 years directly focused on improving revenue
21 ourselves.

22 BY MS. CONROY:

23 Q. So that's not part of any sort of
24 analytical or data science analysis that you're --
25 that you, yourself, are doing or overseeing?

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Page 22

1 A. It's -- it's not part of work that we do
2 ourselves. We do -- our advertising teams, as I
3 mentioned, they also have strategy and operations
4 functions and data scientists like we do. In order
5 for them to do work on revenue growth and understand
6 drivers of revenue growth they at times need to
7 understand how the YouTube platform performs. And
8 so we will partner on some of those projects to help
9 them understand how YouTube performs.

10 But we have not, to my knowledge, done any
11 work directly on revenue by ourselves. I don't know
12 if that distinction makes sense.

13 Q. When you said advertising and sales, is
14 that a YouTube -- are those YouTube employees or are
15 they part of Google?

16 A. They are -- their reporting relationship
17 is part of Google. They report up through another
18 organization. Our ads organization is central
19 within Google. There is a team that is devoted to
20 YouTube but they don't report directly to Neal
21 Mohan.

22 Q. Okay. And do you have anyone that reports
23 to you directly?

24 A. I do.

25 Q. And who is that? Or how many people, if

CONFIDENTIAL

Page 23

1 it's easier?

2 A. So I have -- my team today is roughly 70
3 people, and I have, I believe it's eight direct
4 reports, all of whom manage teams of various sizes.

5 Q. And can you give me a description of what
6 those -- what kind of teams they direct?

7 A. Sure.

8 So I have -- and can I clarify something?

9 Q. Sure.

10 A. When talking about revenue analysis,
11 there -- the advertising revenue -- because Google
12 or YouTube makes revenue from a few different
13 sources. We make revenue from advertising, which is
14 the majority of our revenue.

15 We also make revenue from our subscription
16 products like YouTube TV and YouTube Premium and
17 YouTube Music and a small number of products. We
18 call them alternative monetization, or fan funding
19 products, where you can support creators directly
20 through subscriptions to their channels.

21 I should clarify that we -- my team
22 doesn't do any of the advertising revenue analysis.
23 We do a good amount of analysis on our subscription
24 products to help grow those products, which, in
25 turn, will of course generate revenue for YouTube.

CONFIDENTIAL

Page 24

1 Q. And do your teams also on occasion support
2 some of the creators that you may ultimately receive
3 revenue from?

4 A. We do --

5 MS. HARDIN: Objection. Objection to
6 form.

7 THE WITNESS: Oh, sorry.

8 MS. HARDIN: You may answer.

9 THE WITNESS: We do analysis on our
10 creator ecosystem as a whole. So we don't -- my
11 team doesn't support any creators directly but we
12 will analyze which creators are getting more
13 engagement, which creators are making more money
14 than others, and understand if there's trends
15 related to those.

16 BY MS. CONROY:

17 Q. Okay. Thank you.

18 I think you were going to tell me that --
19 a brief description of the teams that your direct
20 reports oversee.

21 A. Yes. So I have -- it's five direct
22 reports that lead different parts of the product
23 strategy and operations area on my team. And each
24 one of those -- each one of those individuals is
25 mapped to one or more areas of YouTube and so they

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Page 25

1 support one or more product areas and senior
2 leaders.

3 The second team is managed by one
4 individual and that team is called the claims team
5 and they manage all of the data that YouTube puts
6 out externally outside of our walls. So they help
7 provide data for things like senior interviews or
8 press and PR, marketing to our sales and advertising
9 teams when they need to share data with advertisers,
10 or things like government transparency reports that
11 we publish around the world.

12 Q. Do you call that the claims council?

13 A. We do. That's another term for it. We
14 call it the claims team but it's referred to as
15 claims council as well.

16 Q. And -- is it fair to say that the claims
17 team, or the claims council, that's the data before
18 it's -- goes public?

19 A. We had -- yes.

20 MS. HARDIN: Objection to form.

21 THE WITNESS: We have a cross-functional
22 group of people, some of whom are on that team but
23 some of whom are other functional leaders on our
24 legal team, on our communications and PR team, on
25 our marketing team. They make up the

CONFIDENTIAL

Page 26

1 cross-functional claims council.

2 The claims team is the specific team that
3 reports to me that runs the processes and sets the
4 policies for what we do and do not release.

5 BY MS. CONROY:

6 Q. And along with data, does your team ever
7 release text of any sort?

8 MS. HARDIN: Objection to form.

9 BY MS. CONROY:

10 Q. Or just -- when you say "data," what do
11 you mean by "data"? Maybe that's an easier way.

12 A. Numbers and metrics.

13 Q. Okay.

14 A. We -- we are involved -- as I'm sure you
15 could imagine, every -- everything that we, YouTube
16 or Google, releases with numbers and metrics does
17 include text. And so in -- transparency reports are
18 a good example, where we release reports to
19 governments around the world.

20 Those all include some texts and
21 descriptions related to the numbers that we're
22 releasing and so we are involved in the release and
23 management of approvals for both the -- in those
24 cases, the text and the numbers.

25 Q. Okay. And does your -- the claims team,

CONFIDENTIAL

Page 27

1 or the claims council, is that global?

2 A. It -- we manage all of the data globally,
3 but the team is situated all in the United States.

4 Actually, we have a few members in Dublin
5 as well.

6 Q. Okay.

7 A. So...

8 But mostly in San Bruno and New York.

9 Q. But their responsibilities are worldwide?

10 A. That's correct.

11 Q. And the other five direct reports, what
12 kinds of teams are those?

13 A. So five of the seven -- five are on the
14 product strategy and operations team, and they're
15 the ones that are mapping into different areas. One
16 leads the entire claims team. And then one leads
17 our risk and compliance team.

18 Q. And what does the risk -- what are the
19 responsibilities of the risk and compliance team?

20 A. The biggest responsibilities are to help
21 program manage YouTube's compliance with new
22 regulations that come in and impact us and ensure
23 that we are staying compliant over time.

24 So what that means is helping document and
25 manage all of the controls we have in place and test

CONFIDENTIAL

Page 28

1 those over time with individuals in the
2 organization.

3 Q. And can you give me some examples of --
4 you have five that are on the -- what did you call
5 it -- the product teams? I'm sorry.

6 A. Product strategy and operations.

7 Q. Okay. Can you give me some examples of
8 the types of responsibilities they would have?

9 A. Those are the -- when I was describing
10 that part of the team earlier, each one of those
11 has -- and I'll describe it again -- but they have
12 the same responsibilities but specific to an area of
13 YouTube like our Music and Premium.

14 Q. That's what I wanted to understand.
15 So what -- I'm sorry to interrupt you.

16 A. No.

17 Q. But -- so some examples of the types of
18 things that they would oversee.

19 So Music --

20 A. Sure.

21 Q. -- would be one?

22 A. Yes. So the -- they are each mapped to an
23 individual area and I'll describe -- I'll give a few
24 examples of those areas but then I can talk about
25 the types of work that they do within them.

CONFIDENTIAL

Page 29

1 So Music and Premium would be one.
2 YouTube TV is another one. Our creator area is
3 another one and the individuals work -- it's almost
4 exclusively with those teams except in areas where
5 we do, you know, work that spans multiple teams.

6 And they do the same things I mentioned
7 earlier, which is help support those teams in
8 setting their near-term direction and their goals
9 and how we measure success. They help stay on top
10 of the business, day in, day out.

11 We run a meeting. We run a series of
12 meetings that are effectively what a lot of
13 companies refer to as operating meetings where you
14 will bring the leaders of those teams together at
15 some regular cadence. And it varies by team. It
16 could be every other week. It could be once a
17 month.

18 And you will look at a number of metrics
19 and key performance indicators to say are we on
20 track against the things that we deemed are top
21 priorities right now. And we'll show stoplight
22 charts with red, yellow, green, and talk about we're
23 doing well here and we're behind in these areas here
24 and really dig in to why we're behind.

25 And we also, the third thing that those

CONFIDENTIAL

Page 30

1 folks do in each area are the projects that I
2 mentioned earlier, which is a series of analytical
3 or operational projects that help us improve
4 performance in some fashion based on what's
5 important in those areas at the time.

6 Q. Okay. And I think we'll see some of those
7 documents as we go forward and I'll ask you some
8 more specific questions about it.

9 But would it be fair to say that what you
10 just described to me is the type of process that you
11 brought from Google to YouTube?

12 MS. HARDIN: Objection to form.

13 THE WITNESS: We -- the type of process we
14 have at YouTube is something we built over the
15 years. And we're constantly working to improve it.
16 We did bring parts of it from Google, but I -- I
17 would like to think that the team really, you know,
18 improved upon it over time.

19 BY MS. CONROY:

20 Q. And you oversee that now, as well as
21 overseeing the claims team, or the claims council?

22 A. Yes.

23 Q. Okay. What was your -- what were your
24 responsibilities at Hustle Fitness as an advisor?

25 I'm looking at the...

CONFIDENTIAL

Page 31

1 A. Oh.

2 Q. Around the middle of your LinkedIn
3 profile.

4 A. Yeah. This was a -- it was a fitness
5 startup trying to provide services effectively for
6 both players and -- youth players and coaches. And
7 it was started by somebody I knew through -- through
8 a connection of mine, and I was providing strategic
9 advice as the startup was trying to grow and
10 unfortunately went under.

11 Q. Okay. But you were doing --

12 A. Did not gain much speed.

13 Q. You were doing that concurrently with your
14 responsibilities at that time at YouTube?

15 A. That's correct, yes.

16 Q. And I see -- was PawnGuru something
17 similar?

18 A. Similar. Yeah. Very different type of a
19 startup but similar capacity. You know, advisory.
20 And it was very -- fairly infrequent. Maybe calls
21 once a month or every couple months.

22 Q. And do you have any other current advisory
23 relationships outside of YouTube or Google?

24 A. Do I have -- not -- not that I know of. I
25 mean, I don't know if, like, coaching youth baseball

CONFIDENTIAL

Page 32

1 and softball is considered any kind of an advisory
2 relationship. But nothing --

3 Q. I wasn't really thinking of it that way.

4 A. No.

5 Q. I thought maybe you were going to give me
6 a tip on some great startup you were advising.

7 A. I wish.

8 Q. Okay. And give me -- can you just give me
9 a brief description of what you did for Bain? You
10 were there for eight years in Chicago and in Chile.

11 A. Yes. I was a consultant, and I worked at
12 a few different capacities starting as a junior
13 analyst and progressing up into a management
14 capacity. And I worked on a variety of strategic
15 projects across a number of different industries,
16 everything from meatpacking to aerospace and defense
17 to technology to women's hair care, helping
18 companies grow, helping companies cut cost, mergers
19 and acquisitions.

20 And it was -- I loved it. It was a
21 phenomenal start to my career that I thought taught
22 me a lot that has helped me be impactful as I've
23 joined Google and YouTube.

24 Q. Do you do any teaching?

25 A. Other than the coaching, not really. I

CONFIDENTIAL

Page 33

1 have spoken at a handful of classes over the years,
2 at Northwestern, I think at University of Illinois
3 in the past, but no formal teaching roles.

4 Q. Okay. And I see you have some
5 publications.

6 Have you had any publications since
7 joining Google?

8 A. Have I? I don't believe so, no. The ones
9 on LinkedIn are from graduate school, engineering
10 graduate school.

11 Q. They looked -- yeah, that's why I --

12 A. Quite dated.

13 Q. I should have asked you that first, but --
14 okay. You can put this away.

15 A. Okay.

16 MS. CONROY: Let's mark -- so let's mark
17 this one first, the -- the June 25, 2018.

18 (Whereupon, Google-YouTube Hebda Exhibit 2
19 was marked for identification.)

20 BY MS. CONROY:

21 Q. Mr. Hebda, I'm going to show you an
22 exhibit but what it involves is -- or what I believe
23 it does, but I'll ask you, is if it involves digital
24 well-being. So that's what I'm going to be talking
25 to you about and I think I have a document --

CONFIDENTIAL

Page 45

1 Q. And you see there's a July 10th, 2018.

2 [REDACTED] said, "This is awesome, Reid!

3 I think to narrow down the next round of
4 investigation I would recommend running the same
5 numbers for the following in this priority order."

6 And then going to the next page.

7 "Teens 13 to 17 (can we inferred age if
8 not stated?)"

9 Do you see that?

10 A. I do.

11 Q. Okay. Let me just ask you a few questions
12 about that.

13 Do you understand what's meant here by
14 "inferred age"?

15 A. I didn't write the e-mail so I don't
16 understand exactly what [REDACTED] meant. But I can say
17 that when we talk about inferred age at Google it
18 often refers to models that our advertising teams
19 own that for primarily advertising purposes we infer
20 the age of users.

21 Q. And why is that done for advertisers?
22 What's the reason behind that?

23 MS. HARDIN: Objection to form.

24 THE WITNESS: I don't -- I didn't build
25 the models and I'm not an expert in all the

CONFIDENTIAL

Page 46

1 rationale but I can give you my best understanding
2 of why we do that.

3 BY MS. CONROY:

4 Q. That would be fine.

5 A. I think it's twofold. I think it's,
6 first, because when advertisers are advertising on
7 any product or service or even television they want
8 to understand who they can target because naturally
9 certain products are more suited towards certain
10 people, certain genders, certain ages.

11 And advertisers want to make sure they are
12 getting their advertising in front of the right
13 audience. And so we -- we have -- we have to help
14 them understand the audiences in different places.

15 And I think in -- in certain places at
16 Google, some users do declare age and some users do
17 not declare age and there's -- within the Google
18 account itself, there are occasional users that are
19 un -- of unknown gender, unknown age, and so
20 therefore advertising models have to infer that for
21 advertisers. Or they might be signed out as well.

22 Q. And I recognize your -- this is not your
23 expertise, but does -- does Google have some way of
24 inferring age for advertisers?

25 MS. HARDIN: Objection to form. Lack of

CONFIDENTIAL

Page 47

1 foundation.

2 THE WITNESS: I -- this is -- again, this
3 is not my area of expertise. As I mentioned, I
4 believe our advertising teams have models that are
5 able to infer and -- infer age. I can't speak to
6 the details or accuracy of those, though.

7 BY MS. CONROY:

8 Q. What I was trying to get at, when you say
9 "our advertising teams," are you talking about
10 Google advertising teams or YouTube advertising
11 teams or both?

12 A. Oh, I see.

13 MS. HARDIN: Objection to form.

14 THE WITNESS: I'm actually not sure
15 whether it's a central Google team or the
16 YouTube-specific team. I would -- I would guess it
17 is likely the central Google team because it's
18 probably something that's consistent across all
19 advertising but I'm not positive.

20 BY MS. CONROY:

21 Q. Okay. Is there a separate YouTube
22 advertising team; do you know?

23 MS. HARDIN: Objection to form.

24 THE WITNESS: There is. It's part of the
25 Google advertising team but there's -- a part of

CONFIDENTIAL

Page 48

1 that team is directly mapped to YouTube and they
2 build the advertising products for YouTube. But
3 YouTube also leverages services and products from
4 the Google advertising teams, the advertising
5 platforms and things that span across all products.

6 BY MS. CONROY:

7 Q. Okay. I take it Google was able to model
8 inferred age by advertisers at least as early as
9 2018?

10 MS. HARDIN: Objection to form. Lack of
11 foundation.

12 THE WITNESS: I don't know when it
13 started. But yes, I believe in 2018 we were
14 modeling inferred age. Not we, at Google.

15 BY MS. CONROY:

16 Q. Right.

17 A. Excuse me.

18 Q. Okay. And I think you had -- after you
19 had read through this, and, you know, take a look at
20 more of it if you need to, can you describe for me
21 what the problem was here? What -- who was trying
22 to solve this problem and what the back and forth
23 was?

24 MS. HARDIN: Objection to form. Lack of
25 foundation. Mischaracterizes the document.

CONFIDENTIAL

Page 56

1 specific ones.

2 BY MS. CONROY:

3 Q. Okay. But I guess my -- the point of my
4 question is, it may be that the metrics for
5 well-being were -- are still a work in progress or
6 difficult to establish, but there are other things
7 that are talked here that you have been able to
8 establish metrics for?

9 MS. HARDIN: Objection to form.

10 THE WITNESS: Yes, we -- we have many
11 metrics in place. The way I think about it is, we
12 have metrics like how many users are coming to the
13 platform, or how much time they spend on the
14 platform. Different types of engagement.

15 We have slices of those metrics so we
16 can -- we have a whole pool of users. We will often
17 slice them by information that we can tell -- within
18 of course all of the privacy restrictions that we
19 have. We can slice those by country, we can slice
20 those by age, by gender, and so we regularly do
21 that.

22 And I -- I'm fairly -- you know, fairly
23 certain we did in some fashion here. I just don't
24 recall the exact output.

25 ///

CONFIDENTIAL

Page 57

1 BY MS. CONROY:

2 Q. Okay. And when we're talking about age, I
3 think you mentioned you are able to slice by
4 declared age; is that correct?

5 A. That is correct.

6 Q. Okay. And what is meant by "declared
7 age"?

8 A. When users create a Google account,
9 Google -- and I will caveat this also by saying I'm
10 not on the Google account team and so I'm not a deep
11 expert here. I'm speaking more to my own personal
12 experience and recollection.

13 Q. And I'm asking when you're using the term
14 "declared age" I'm just asking you --

15 A. Yes.

16 Q. -- what you understand that to be.

17 A. Right.

18 When users create a Google account,
19 Google, the Google account asks for their age -- or
20 for their birth date, more specifically. It also
21 asks for their gender, if they choose to share it as
22 well. And declared age refers to the age based on
23 the birth date that users declare as part of their
24 Google account.

25 Q. And have you ever seen any analysis of the

CONFIDENTIAL

Page 58

1 veracity of that birth date that is provided?

2 MS. HARDIN: Objection to form.

3 THE WITNESS: Can you be more -- when you
4 say "veracity," can you be more specific?

5 BY MS. CONROY:

6 Q. Have you ever seen any metrics with
7 respect to whether or not someone is telling the
8 truth about their age?

9 MS. HARDIN: Objection to form.

10 THE WITNESS: I haven't seen any metric
11 specifically but I will say that users tell us what
12 their age is but we don't -- we don't have their ID.
13 We don't -- we're not with them in person and so we
14 don't -- we don't currently have -- my understanding
15 is we don't verify that or we don't have a way to
16 know whether there's veracity to it or -- or not.

17 BY MS. CONROY:

18 Q. And my question is a little bit different.
19 Have you ever seen any analysis of whether
20 or not -- understanding you're not check --

21 A. Yeah.

22 Q. -- or someone is not checking with an ID,
23 whether or not what the percentage of people telling
24 the truth about their birth date is?

25 MS. HARDIN: Objection to form.

CONFIDENTIAL

Page 59

1 THE WITNESS: I haven't seen that analysis
2 and I don't know that we could do that analysis to
3 know whether somebody is telling the truth or not
4 without actually going out and gathering IDs,
5 verifying that those IDs are valid.

6 So I'm not saying that hasn't been done at
7 Google but I'm not aware that it has been.

8 BY MS. CONROY:

9 Q. Are you aware of any surveys that
10 attempted to determine that?

11 MS. HARDIN: Objection to form.

12 THE WITNESS: I'm not aware of any surveys
13 that have attempted to determine that. Though,
14 again, there's a lot of analysis done around Google
15 with many teams and so it's not to say it hasn't
16 been done.

17 BY MS. CONROY:

18 Q. Yeah. Now, inferred age is done by the
19 advertising team, correct?

20 A. That's correct.

21 Q. Okay. Have you ever seen any metrics with
22 respect to inferred age with respect to looking at
23 an issue like well-being?

24 MS. HARDIN: Objection to form. Lack of
25 foundation.

CONFIDENTIAL

Page 239

1 STATE OF CALIFORNIA)

2 COUNTY OF YOLO)

3 I, ELAINA BULDA-JONES, a Certified Shorthand
4 Reporter of the State of California, duly authorized
5 to administer oaths pursuant to Section 2025 of the
6 California Code of Civil Procedure, do hereby
7 certify that

8 JOHN HEBDA,
9 the witness in the foregoing deposition, was by me
10 duly sworn to testify the truth, the whole truth and
11 nothing but the truth in the within-entitled cause;
12 that said testimony of said witness was reported by
13 me, a disinterested person, and was thereafter
14 transcribed under my direction into typewriting and
15 is a true and correct transcription of said
16 proceedings.

17 I further certify that I am not of counsel or
18 attorney for either or any of the parties in the
19 foregoing deposition and caption named, nor in any
20 way interested in the outcome of the cause named in
21 said deposition dated the _____ day of
22 _____, 2025.

23 
24

25 ELAINA BULDA-JONES, CSR 11720