

AMENDED Exhibit 1050

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

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Project Freyja: Preliminary Insights from Phase 1 (Online Community)

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PROJECT BACKGROUND:

- Historical Gender imbalances in viewership and creation on YouTube have not abated and appear to be even more dramatic on Shorts, resulting in erosion in usage and brand sentiment
- This project seeks to provide recommendations to YouTube and Shorts product and marketing teams on how to remedy, helping YouTube to provide more value to women and non-binary users, ensuring the platform is a welcoming place where they can find relevant content
- This research will be conducted in three distinct phases. **The below topline insights are preliminary learnings from Phase 1 of this project.** Phase 2 includes in-home friendship groups and Phase 3 includes a quantitative survey **to validate findings in previous phases.** For full project scope, including extensive background and Phase 2 and 3 methodology notes, see [HYPERLINK "https://docs.google.com/[REDACTED]" \h].

PHASE 1 METHODOLOGY:

- 5-day moderated online community with 90 participants identifying as women (young women aged 14-17 and adult women aged 18-44, we will cumulatively refer to them as "women" throughout the report)
 - Please note that the findings in this memo are representing the themes we observed in our immersive discussions with this online community and should not be seen as representing the full experience among those identifying as women (more details how we plan to validate these findings, ie our plan for the next phases of this research is linked above)
- Majority (54) non-DAUs of YouTube, minority (36) DAUs (*note: YouTube usage is self-reported*)
- All participants regularly use short-form and long-form video platforms, are viewing across a mix of devices and are engaging in a mix of viewing and creation behaviors (none are monetizing)

TL;DR

Among the female-identifying participants in our study...

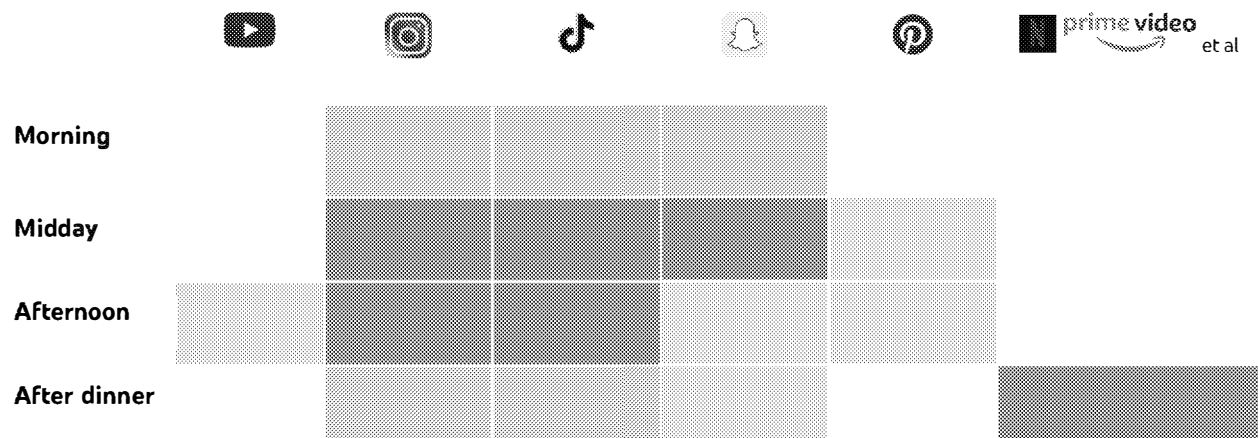
- Non-DAU women especially use YouTube in a more narrow and predetermined way (e.g., they only watch a specific type of workout video twice a week), while DAUs use YouTube to meet a broader range of functional needs and are willing to explore the platform more to find the content that would meet that need (e.g., listening to music or podcasts, watching makeup tutorials, and catching up with their favorite creators).

"Now, [YouTube] is more not just for fun, but it's more scheduled around when I'm doing an errand or a chore. I listen to you in the background when I'm eating something and it's like passive listening." DAU 18-24yo

"It feels unorganized, like there isn't categories, and doesn't have a good way to communicate and women love to chat." NonDAU 14-17yo

DOUBLE CLICK: WOMEN'S ONLINE ROUTINES

Non-DAUs (self-reported) usage of apps/platforms over dayparts:



**Darker gray indicates more intense usage, based on a qualitative assessment of daily online "diaries"*

A trend noted in our research is that apps that provide social connection and quick hits of entertainment are revisited more often throughout the day. YouTube usage is reported to be relegated to moments with ample time to look for information, instructions and inspiration with more depth.

- **Morning app usage is triggered by social notifications** from Instagram and Snapchat. TikTok usage is less likely to be triggered by a notification but instead motivated by the limited time between waking up and needing to start the day. YouTube usage is limited as a result of constrained time (no time for LFV).
 - *DAU difference:* A minority of DAUs mentioned letting children watch kids' content or relying on a fashion/beauty tutorial
- **Midday is prime for SFV content**, accompanying them when they're busy with school work, work or other activities.
 - *DAU difference:* DAUs heavily rely on YouTube for background music or podcasts while exercising, cleaning, eating, chores.

- **After school or work, content either switches off or switches to entertainment mode.** For many, the after-work or after-school time is quiet as they shift their attention to in-person social or other life commitments. On the days without those demands, the post-school/work time marks a switch from SFV to kill a few minutes to scrolling for longer periods of time for entertainment or looking for longer form content. Both DAU and non-DAUs rely on YouTube as a source of information and inspiration to support homework, cooking or hobbies.
 - *DAU difference:* DAUs who visit YouTube in the time after work or school are more likely to be looking for entertainment than they were earlier in the day.
- **Evenings are for longform content, but also digital multitasking.**
 - Non-DAUs are more likely to stick to streaming services (*Netflix, Hulu, Prime etc*) for longer form content.
 - *DAU difference:* DAUs are more likely to report watching YouTube videos with the family or winding down with longer content before bed.
 - In some instances and especially for younger audiences, the longform content is the background content while the mobile, with SFV app content, is their primary screen.
 - As in the morning, bedtime triggers a check in on social notifications (especially true for teens), and mindless scrolling is a common activity before falling asleep.
- Generally, the most notable difference between weekday and weekend app usage is that women report spending more time with SFV during the week and dial up their LFV usage over the weekends.

Analyzing type of content, device and format we noted that time available and app chosen dictate the type of format watched and device used. On YouTube, non-DAU women primarily report watching on their desktop and default to consuming longform video vs other formats.

- Surface: Non-DAU women report primarily relying on mobile for Instagram and TikTok, while utilizing their desktop for YouTube.
 - *DAU difference:* DAUs are more likely to use a variety of screens to watch YouTube depending on content / context (mobile, desktop, TV).
- *Format:* For all users, longform YouTube content is still seen as the default format. Non-DAUs rarely mentioned YouTube as their preferred platform for content like SFV, podcasts and livestreams, tending to use a variety of platforms to fit their various needs.
 - *DAU difference:* DAUs are generally more likely to use **YouTube** to access content formats (but still see VOD as default) and, across all DAU audiences, no aspect of **YouTube** was unused entirely.

BRAND IDENTITIES

We discovered that YouTube is unanimously seen as male, by DAUs and non-DAU women alike

- TikTok and Instagram's personas are described as predominantly female.
- The perception that YouTube is more likely a male is informed by their experience with both the platform itself and with content and creators (and their audiences).

"I feel like [YouTube is] male because when I think of YouTube, I think of male content. Guys playing video games and that kind of thing." NonDAU 25-44yo

