

AMENDED Exhibit 1072

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

PROCESS NOTES:

- Memo to be added to [REDACTED] at least 48 hrs prior to mtg.
- Please remember to open your doc for comments for all roadmap meeting attendees
- Core-Ops team will send pre-read to all meeting participants at least 36 hours prior to meeting
- **All attendees are expected to have read memo prior to meeting;** we highly encourage adding your thoughts and questions as comments in the doc prior to the meeting
- **Please do not make changes to doc after sending — add changes as comments instead**

MEMO EXAMPLES:

- Many of you have asked for examples of particularly effective / “canonical” memos — we’ve listed a handful of them [[HYPERLINK](#) "https://docs.google.com/[REDACTED] [REDACTED] \h]. You’ll notice that they take many shapes and sizes and that there is no set length.

Title: ACE 3P Effects - Progress, Roadmap, and Path to Closed Beta

Team: ACE Effects POC: [REDACTED] Contributors: [REDACTED]

Date: 2/6/23

Discussion Questions

Goal of Memo

Share progress on enabling user submitted effects (3P Effects) on YouTube. Provide visibility into the roadmap and a workback from a 2023 closed beta.

Context / Background

We funded the Effects teams to accelerate creation on YouTube. Effects drive video creation and consumption. In public filings, Meta, Snap, and ByteDance have each credited effects with [[HYPERLINK](#)

"https://docs.google.com/[REDACTED]

[REDACTED] \h]. Snap has 3M+ user submitted effects, Instagram

has 2M+, and TikTok is quickly catching up despite launching UGC effects three years later. The overarching product hypothesis for Effects on YouTube is that YouTube can accelerate casual creation by providing effects that inspire creation, facilitate creation, and create opportunities for participatory creation.

A Simplified View of Effects

Effects are media transformations that can be applied to either camera feeds or in post-hoc editing flows. There are three key components in effects:

1. Assets - Objects that should appear within the effect: 3D models, images, sounds, text, etc
2. Capabilities- componentized functionality provided by the effects platform that the effect depends on: Segmentation, tracking, beat detection, etc
3. Scene Graphs - A specification for how Assets and Capabilities should behave and interact to create the effect

Assets are mostly interoperable across effect platforms (SparkAR, Lens Studio, Effect House). Capabilities behave slightly differently from platform to platform (e.g. hand tracking). Scene graphs are markedly different and depend on the platform's effect runtime. The core jobs of any 3P effects platform are to:

1. Enable effect creators to realize their creativity
2. Provide distribution of those effects to video creators hungry for effects
3. Provide the effect creator with downstream creation/consumption analytics and the ability to connect with effect consumers so the effect creator can see others enjoy their work

The core jobs of the effects themselves are to:

1. Inspire creators by giving them something to react to.
2. Make it easier for creators to produce a video they have in mind.
3. Engender enjoyment or belonging through surprise or as a vehicle for a meme.

Categories of Effects

Effects can be categorized into **Tools** and **Toys**.

Tools are semi-evergreen capabilities that help creators make their content. They help video creators convey a message or feeling, but are not the focus of the content. Examples include relighting, skin retouching, captions, and face blurring. Quality is paramount when it comes to Tools.

Toys are experiences that become a key part of the content. A prominent example is the horoscope-esque carousel filter that records the creator's reaction and tells them what type of "X" they are (Disney Princess, Pizza Topping, Color). Toys are participatory, leverage surprise, and can inspire users to become Hobbyist Creators. Toys are individually ephemeral and need to be refreshed to stay relevant.

Trends¹ are memes and a subcategory of Toys. Creators take a set of common components and put their own take on them. Components can include audio clips, video premises, or a recognizable effect. Trends are ephemeral, impossible to predict, and varied. A successful Trend effect is closely aligned to community and culture. With Trends, the video setup differs, but the payoff is consistent across videos in the set.

1P vs 3P effects creation dynamics

YouTube's Culture & Trends team performed [HYPERLINK ██████████] of effects usage on other platforms in Q4 2022. This new data changed the way we think about effect ecosystems.

Total effects volume is driven primarily by 3P effects, while 1P effects drive a disproportionate amount of content creation² on a per effect basis by providing evergreen tools like Greenscreens. 1P effects provide a steady stream of high quality, noteworthy capabilities while 3P effects adhere to power law returns. The 3P effects that become hits lead to [HYPERLINK "https://docs.google.com ██████████] than 1P effects do on average. Other platforms capitalize on these dynamics by giving 1P effects prominence and build recommendation systems to highlight a subset of the most viral 3P effects.

¹ We originally viewed Trends as a separate category. The dividing line was blurry and didn't lead to different product/eng/ux decisions. As a result, we collapsed them into one bucket to make things simpler.

²[HYPERLINK ██████████]