

AMENDED Exhibit 1081

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

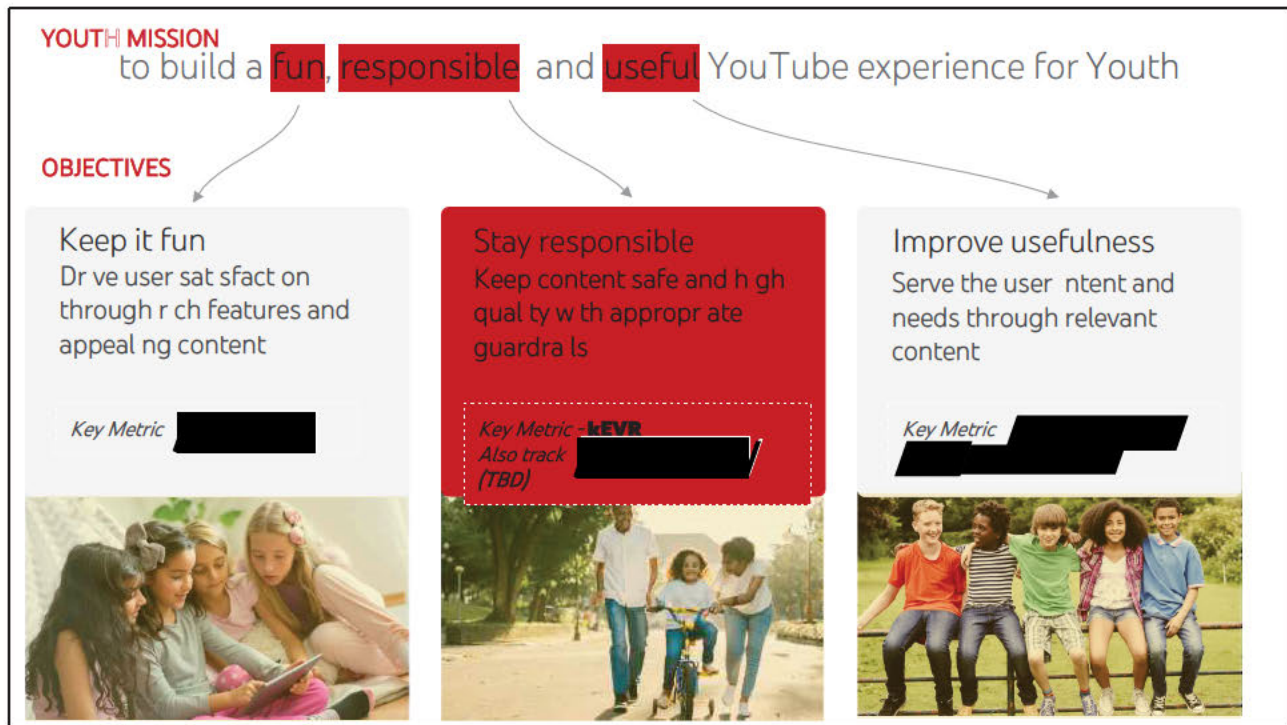
Produced in Native

PRIVILEGED

—

[go/vt-youth-wellbeing](#)

 YouTube



YOUTH MISSION

to build a fun, responsible and useful YouTube experience for Youth

Stay responsible
Keep content safe and high
quality with appropriate
guardrails

Key Metric
Also track
(TBD)



Goals for Today

1. Align on problem definition for wellbeing
2. Steer on strategy, goals, and key metrics

**WELLBEING
MISSION**

Youth **feel positive** about themselves after spending
time anywhere on YouTube

3 key concerns highlighted by parents, experts and youth

HABITUAL HEAVY USE

*Endless scrolling and
unintentional
consumption*
Take a break, daily limits,
quiet hours etc.

PROBLEMATIC CONTENT

*Content that may have
potentially negative impact*

Diversification, S&D tweaks,
filter transparency,

ONLINE SAFETY

*Youth putting themselves
at risk or needing help in
crisis*

Crises one box, Info hubs,
civility reminders

Slide 1

1

should we reorder to show content first ?

; 4/29/2022 3:23:55 PM

3 key concerns highlighted by parents, experts and youth

Today's
focus

HABITUAL HEAVY USE

*Endless scrolling and
unintentional
consumption*
Take a break, daily limits,
quiet hours etc.

PROBLEMATIC CONTENT

*Content that may have
potentially negative impact*

Diversification, S&D tweaks,
filter transparency,

**Content that is potentially
negative in high volume**

ONLINE SAFETY

*Youth putting themselves
at risk or needing help in
crisis*

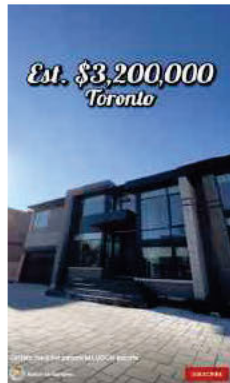
Crises one box, Info hubs,
civility reminders

On Shorts, one after another video encouraging negative social comparison

Child development experts say these videos appeal to teens because of the *thrill-seeking* factor and the *surprise* element. But teens *don't have self-discipline abilities to discern negative effects in the moment until 16-17 yrs old*.



JoJo Siwa shows me her personal car collection (Custom Tesla)
She's driving a custom BMW 4 series and has received a custom Tesla Model X for her 16th birthday from her manager.



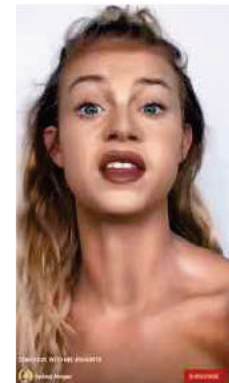
Girl lets me into her parents' MANSION
Female character lets narrator into her house to show off her parents' expensive mansion



Captain Bling Bling Is A Gentleman
Characters showing off all of the luxury gifts they purchased for their anniversary



The Life of A Billionaire
Male character calls himself "Captain Bling Bling" and shows off his extreme wealth through regular everyday activities



CONTOUR WITH ME
Female character piles on makeup and contours her neckline and shoulders to look "muscular".

Problem: Watching high volumes of certain content can potentially negatively impact (PNI) teen wellbeing

Teens' self-awareness to identify negative effects in the moment isn't fully developed until 16-17 yrs old.

High
Volume
Potentially
Negative



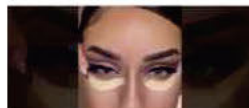
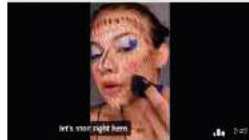
NEGATIVE SOCIAL COMPARISON

Experts on these videos:

"Watching too many, someone may start thinking: maybe this is what I'm supposed to be doing"

"Teens struggling with these issues will also seek out more"

"Difficult to interpret effects without the social and cultural context"



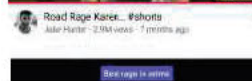
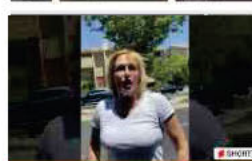
SOCIAL AGGRESSION

Experts on these videos:

"Immediate physiological effects, eg. hands sweaty, chills"

"Feeding highly intense emotional content can trigger anxiety for those already stressed"

"Model behavior from people that look more like them, depending on cultural and developmental environment"



Policy violative videos about permanent cosmetic procedures, body valuation issues, violence, dangerous pranks, etc., are NOT the focus of our discussion

Permanent cosmetic procedures, body valuation issues, etc.

Violence, realistic guns, etc.

APPENDIX



Proprietary & Confidential

MISSION	Time spent on YouTube promotes physical, mental, social, and developmental well-being of tweens and teens.	
HOW	CONTENT 58% use high quality authoritative voices and reduce spread of low quality grey-area risky content	FEATURES Deliver a viewing experience that helps regulate consumption and manage time
AREAS to FOCUS (phase 1)	body image, diet, weight loss, suicide, self-harm, depression, anxiety <i>Why focus on only this area</i> Youth are more vulnerable to these topics and more likely to seek it out online than adults. XLQ/Misinfo is already excluded for SupeX 	Digital wellbeing features for shorts <i>Why focus on only this area</i> High consumption of short form content among youth. The short form viewing experience exacerbates concerns of addiction and ADHD
METRICS	% low/ high quality views on physical & mental wellbeing % low/ high quality views on social & developmental wellbeing Valued Watch Time Wellness surveys (new)	Session length Avg. % low/ high quality views per session Session diversity Utilization of new DWB features