

AMENDED Exhibit 1112

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

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YT Shorts - G Leads

September 27, 2021



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Short form video is driven by easy creation, user engagement, and trends



Frictionless Creation

Easy to use camera features, remixing, and instant engagement encourage creators to participate in trends and memes



Viewer Engagement

Endless feed of short videos immediately available when opening the app, offering instant engagement



Music & Trends

Discovery algorithm tuned to content like y to trend, especially for music.

As you know, Short Mobile Video is a critical innovation for YT and; we're aggressively building our offering for the next generation of Creators and to meet User needs.

We knew there was a new type of creator relying exclusively on mobile to express themselves and they needed creation tools that make easy and fun to create these videos on YT and tell their stories to the world. They expect to be able to find an audience quickly.

We knew viewers were interested in short bursts of entertainment throughout the day and that we had to build an experience that made discovery effortless and we had an opportunity to fit into small moments throughout viewers day.

And not only did we need to build creation and viewing experiences optimized for short form, but also about how we do recommendation, including tuning our recommendations to expose users to trends.

And for that we built shorts

End of Q2 data to be comparable

Short form video has seen explosive growth spurred by TikTok

	DAUs	Growth (Y/Y)	WT/DAU /Day	Primary Geo	Trends / Recent developments
 IG Reels	~450M A time 50% of IG DAU view 1 Reel due to home feed placement	<1y o/d		Americas	• Launched in Aug 2020 to compete with TikTok; quicky added essential features
 TikTok	~437M	~23%	~90 i	Americas	• Described as a "dia" (Ju e 2020), strong growth continues • Tested live streaming (w/Wa a t)
 Snapchat (Actuals)	~355M	~623%	~16 i	Americas	
 Snapchat Spotlight	~90M	<1y o/d		Americas	• Paying creators in iOS ecosystem based on visibility of posts
 Douyin	~750M	~25%		China	• Positioned as a "ce" with a "check" out • Customized ads & stickers
 Kwai	~300M	~15%	85 i	China	• We're using HK e-commerce at ~\$180B valuation • Positioned Paid Digital Goods; use of "get" aid for "digital" to affiliate
 TikTok Lite	~25M	<0% Primary due to data	13 i	SEA	• Highly gauged; use of "ust" each "tai" "eve" to access "ivi" "ges" "suc" "as" "ive"

Includes ~M DAU for India (w/ VPN) does not include the ~5M DAU in India pre-ban in Q2 2020
 Note: Shorts DAU and time per DAU is the average for June 2022

Short form video has been taking off across the industry.

What you see here is EO Q2 data on viewership.

Although we are in the early days of Shorts, we are #3 when it comes to global viewer numbers.

A couple points to note on competition:

IG Reels is diff: Even though IG looks like the first one with their Reels format - they count reels even if they are seen in the main feed.

For TT:

This data laps last years india ban; so that is why it looks low for growth (in Q2 of 2020 their DAUs included india)

They were in india in q2 of last year and are no longer in india in this q2

Also interesting APAC based like Kwai.

DAU Sizing Notes:

- IG Reels DAU based on YTC Metrics total IG DAU for Q4 (~860M); assume 50% of DAU engage with Reels at least once per day
 - If a user scrolls the IG homefeed for more than one minute, they will technically "view" at least 1 Reel video. We estimate that DAUs spend ~40min/day on IG, therefore, 50% of IG DAU is quite conservative.

TikTok, Douyin, Kwai, Likee all have intentional DAUs, whereas our IG Reels figure captures unintentional DAUs

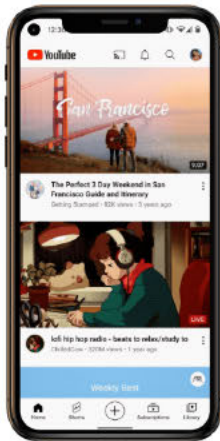
- We have a low degree of confidence in this estimate given the lack of publicly available information and difficulty in estimating the figure given it is not a standalone app.
- TikTok DAU based on YTC Metrics estimation for Q4
 - Does not include India numbers due to the ban - 115M DAUs as of end of Q2
- Snap Spotlight based on publicly released information of 100M MAU engaging with Spotlight, 1:2 DAU:MAU ratio applied based on App Annie
- Douyin publicly released 600M DAU in Q3'20, trend forward to end-Q4 based on [Statista historical data](#)
- Kwai based on [publicly disclosed filings](#)
- Likee based on [August '20 report of 150MAU](#), scaled up based on AppAnnie growth and applied 2:5 MAU ratio based on App Annie

EO Q2 numbers

> Get #s of user base from India (TT), get definition of DAU for Shorts #s

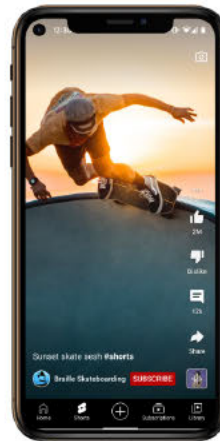
YT launched Shorts first in India (Sept '20), followed by US (Apr '21), and globally (July '21)

Creator experience



- Make Creation tool front and center
- Launch Remix VOD feature
- 20 Creation launches
 - Music in editor
 - Camera Speed Control
 - And more

Viewer experience



- Dedicated Shorts tab and shelf on mobile
- Easy to swipe vertical playback experience
- Engagement options on RHS menu (e.g., like, comment, share)
- 57+ Discovery launches

We've come a long way with both the creator experience and the viewer experiences. Shorts creation tools and user product experience is now available worldwide. At this time last year we had just launched our tools in India, then we launched in US in Q2 of this year and we launched WW earlier than originally planned and are showing strong early progress.

Starting with Creation, we've made the ability to create front and center within the app, as you can see with the + button on the bottom left

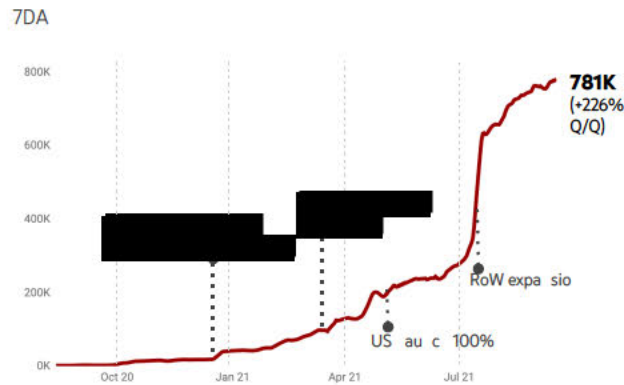
And we launched a key differentiator for YT: the ability to use audio from our long form corpus - users can remix not just shorts but bring in audio from our longform corpus. This unlocks new use cases that can only happen on YT.

And we continue to improve our camera and editing features.

On the viewer front, we have been improving our playback experience, and we have launched a dedicated tab on mobile which you can see on the bottom. And over 57+ discovery launches in Q3 that have driven viewer engagement. Note that our discovery launches also focus on given new creators a chance at their shorts being seen.

So far, 780K+ Channels use our Shorts creation tools

Channels using creation tools



2.2M Daily Shorts Uploads

4.3M Daily Shorts Uploads

31% Of Shorts uploads are created with our tools

Note: Data is daily average ending Sept 2021 ([source source](#))

Good early traction with Creation. 781K using our tools to create their video - the large recent increase coming from our launch to over 100 countries. Shorts created with our tools represent 31% of all Shorts on YT.

Shorts is playing a significant role wrt new creators coming to the platform.

Currently, ~50% of all 'new' creators are Shorts Only or Shorts Dominant, and this has been growing.

There are promising indications of [early traction with GenZ](#) (46% of Shorts Creators are GenX)

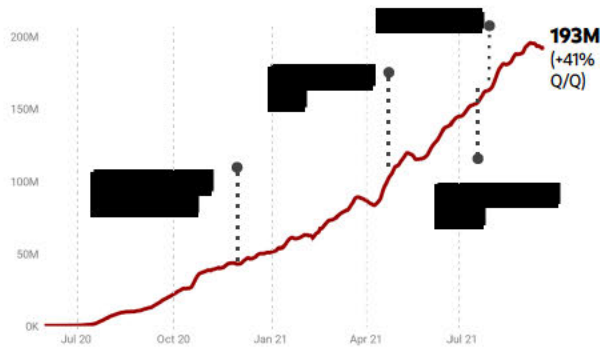
(I'm defining "new" as uploaded for the first time within 90 days)

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And we've grown to 190M+ daily engaged users

Short Engaged Users

10 min - 7DA



20B Daily views

38% of YT mobile views

7% of YT mobile WT

Note: Daily view ending Sept 2021 (source: source)

We are holding ourselves to 10min+. Not just counting if a user watches a few seconds of a short or even just a couple shorts.

Getting close to 200M daily users watching at least 10min

Small recent dip in this graph is bc of a responsibility launch - [REDACTED]

Shorts now represents 38% of all YT mobile views and 7% of mobile WT. If you look across all of YT, not restricting only to mobile, 31% of total YT views. (4.4% of total YT WT)

([source](#))

- Shorts Creators skew younger than YouTube's viewers population, with 45.7% Shorts creators in the 13-24 age group (vs. 27.2% of YT DAVs)

Ads experiments were initiated in May

- Start ng w th App Install v deo ads between Shorts
- Early results show that users are engag ng w th Shorts ads and prom s ng advert ser value, [REDACTED]
[REDACTED]
[REDACTED]
- Initial launch expected in Q4



Ads formats: App install video (already under test on Android), as you can see on tehr ight. [REDACTED]
[REDACTED]

Action Video (launch in Q4 21) and Discovery Image (launch in H2 2022)

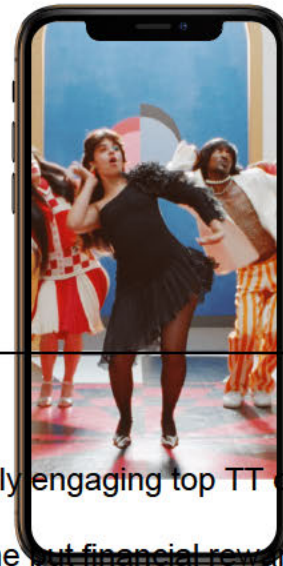
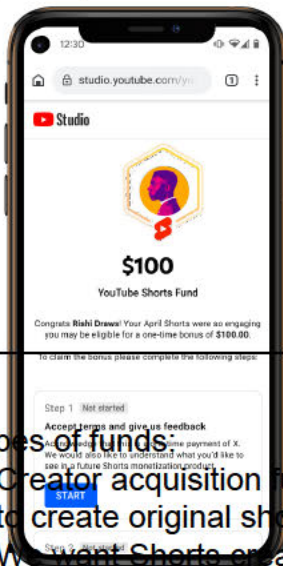
To drive Shorts uptake, we are running several Creator and User adoption initiatives

Creator Adoption

- [REDACTED] Creator Acquisition fund, targeted at top 1K off platform Creators e.g., top TikTok creators
- \$100M Shorts Creators fund, monthly reward to Creators with top viewership

User Awareness

- Launch campaigns in the US and India
- Paid media campaigns in UK, BR, JP and others planned to go live in early September



Two types of funds:

- Creator acquisition fund where we are directly engaging top TT creators to create original shorts on YT.
- We want Short creators to not only find fame but financial rewards too.

In August we launched our \$100M Shorts Fund where any shorts creator, can make between 100-10K depending on how their shorts performed the last month. We thought it was important to give new creators a shot at making \$, so creators are eligible regardless if they are in our partner program or not. This was very positively received. Across our 10 launched markets, we invited [REDACTED]. At the end of Sep, we'll announce an additional 30+ (taking us to 40+ total).

[REDACTED] of last month's winners were non-monetizing so the shorts fund is their first form of monetization on YT.

We are also actively running campaigns to build awareness of Shorts amongst users, on and off platform. These have also been highlighting the unique ability on yt to pull audio from our longform corpus, like you see in this creative on the right.

Case study: BTS Dance Challenge

Campaign for viewers to post dance Shorts with launch of K-pop band BTS's newest single: Permission to Dance

- [REDACTED] of creators were first time Shorts creators
- [REDACTED] views on related Shorts [REDACTED] % of goal)
- Most socially discussed dance challenge since 2018
- Up next: Ed Sheeran campaign



Dance challenges big trend in short form video

[REDACTED] derivative videos created through 30 days of the challenge

As a user awareness example, I thought I would give you some behind the scenes on our collaboration with the South Korean boy band BTS. they actually came to us excited to be a first mover with Shorts with their new single Permission to Dance. We collaborated to accelerate our global launch and accelerate key features to make this successful. The call to action to their fans was to create a short for their dance challenge. A unique spin was at the end BTS would create a full YT video compilation with the best fan-created Shorts. Great example of how short form and long form on the same platform... The results were very strong: [REDACTED] views. And the majority of creations were by first time Shorts Creators.

While we have lots of momentum, we have a lot still to do

	Key learnings and gaps	Plan to address
Differences between Short and Long Form	Short form creators want to be provided inspiration on what to create; especially important to get users to start creating	[REDACTED]
Creator threats and issues	Bad actors will upload / copy other creators' content without permission	[REDACTED]
Ads monetization	Initial Ads experiments [REDACTED]	Test additional ad formats, to drive growth while ensuring adherence with brand suitability guidelines

In short form video - the connecting between watching and creation is very important: users get inspired by what they watch and then feel like they can join in too - [REDACTED]

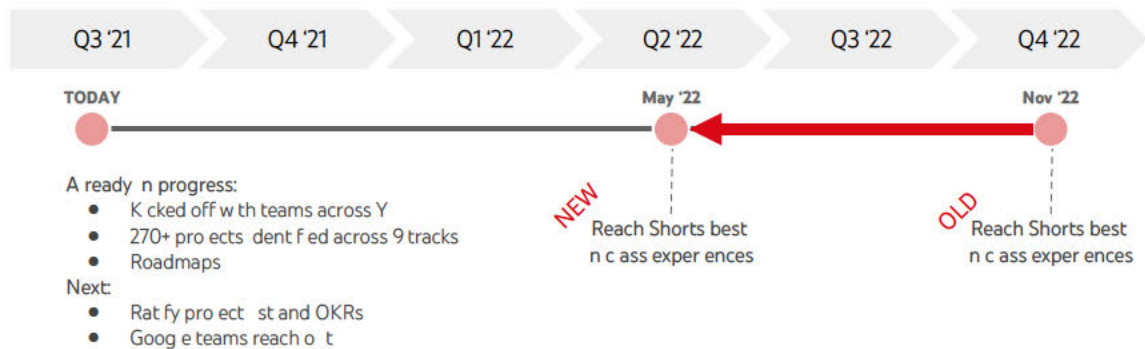
Next:

Creators are noticing that Shorts are getting an audience and getting views; that means bad actors have as well and we are seeing channels rip off other ppl's content and re-upload to YT to grow a channel. We are taking this into account and [REDACTED]

Starting with App Install video ads between Shorts

[REDACTED]

We are accelerating our timeline to reach Shorts parity, differentiation and first-class experience goals



We are here in q3

Original plan was to have competitive product EO 2022

We are working on an acceleration across YT, to pull this timeframe in to mid next year. Teams across YT have identified over 270 projects.

Next step:

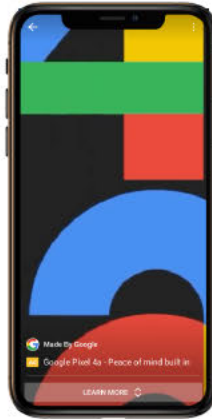
More broadly across Google - how can we leverage knowledge and expertise others teams we are hoping to work with. i.e we have been reaching out to teams we work with, like RMI and COre.

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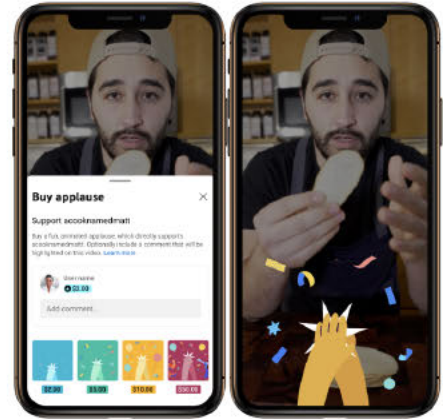
2021 / 2022: Expand monetization across Ads, Shopping and Paid Digital Goods



ShopTube
Pot
Q3 '21



Built out more Ads Formats
Action video and Discovery image
Q4 '21



Paid Digital Goods (PDG)
Support Shorts
Pot n 2022

Looking forward we will have a suite of monetization options.

Shoptube - we think shorts is a great format for discovering and purchasing products; we have just kicked off a pilot here with a set of Shorts creators.

Ads formats: we'll expand to from App install video (already under tests) to Action Video (launch in Q4 21) and Discovery Image (launch in H2 2022)

PDG - enable viewers to directly recognize their favorite shorts creators

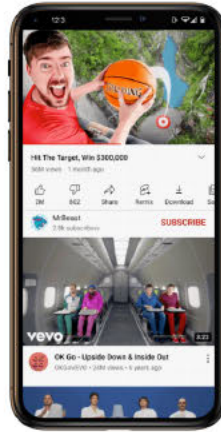
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2021 / 2022: Strengthen product differentiation**Green screen**

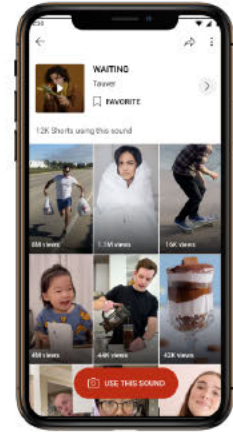
Empower creators to deploy any background
Q3 '21 Galaxy, H1 '22 YouTube Videos

**Toolbelt**

Expand our toolbelt to include more features
Q4 '21

**Collabs**

Co-create asynchronously with any other video
H1 '22

**Audio Trends**

Algorithmically encourage participation in trends
Mid '22 on-going analyses

I wanted to highlight a few things coming up next:

1. We have started to rollout the first stage of Greenscreening, which enables users to switch out the background of their video to make it more engaging. Our plan here is to unblock the whole corpus of YT videos to enable any YT video to be your background next year. remix audio to remix video - codename for this is MultiMix.
2. We have many Creation tools planned, including expanding our effects and filters so that creators have a comprehensive toolset of features
3. Collabs will let you go to any long form yt video, like this mr beast one and tap Create and pull a portion of the video into your short - so here this woman is reacting to mr beast with her short. So the way to think about this and Greenscreen are: the whole of YT becomes inspiration and ingredients for creation. -today you can pull in portions of audio; with these features, you will be able to pull any part of the video to create.
5. We have a big focus on driving trends - a key workstream here is getting smart about repeatedly exposing viewers to an audio track while they are watching, so they recognize it and then want to jump in on the trend and create.

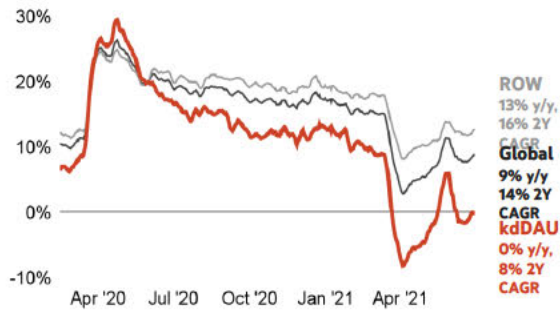
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Thank You!

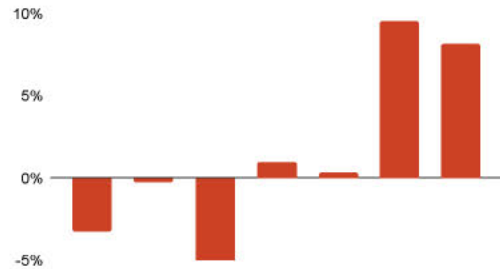
E d of Q2 data

YT is seeing pockets of softness in growth in key developed markets...

DAU Growth (Y/Y, 7da Avg)



kdDAU Growth (Y/Y Growth Rates, Q2 2021)



	US	CA	GB	DE	FR	JP	KR
DAU	218 M	24 M	41 M	40 M	34 M	70 M	41 M
21 Y/Y	3%	0%	5%	1%	0%	10%	8%
2YR CAGR	6%	10%	8%	8%	7%	15%	14%

End of Q2 data;
based on self-reported age

... and in younger Gen Z in select countries

