AMENDED Exhibit 1122

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION	Case No. 4:22-MD-03047-YGR MDL No. 3047
This document Relates to: ALL ACTIONS	

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Wednesday, January 15, 2025

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This is the Videotaped Deposition of KATHARINA OSTERGAARD, held at Eden House, 8 Spital Square, London, United Kingdom, E1 6DU, commencing at 9:10 a.m. GMT, on the above date, before Susan D. Wasilewski, Registered Professional Reporter, Certified Realtime Reporter, Certified Manager of Reporting Services, Certified Realtime Captioner, and Florida Professional Reporter.

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MR. KEYES: Thank you.
MS. CONROY: We good?
THE COURT REPORTER: We're good.
KATHARINA OSTERGAARD, called as a witness by Plaintiffs, having been first duly sworn, testified as follows:

DIRECT EXAMINATION

BY MS. CONROY:
Q. Good morning. My name is Jayne Conroy and I'm here today on behalf of hundreds of children and their parents and families, as well as school districts, that have been, as we alleged, harmed by YouTube, and we have sued in the United States District Court in California.
Can you tell me your full name, please?
A. Katharina Martina Ostergaard.
Q. And what's your job title?
A. I'm a Legal Operations Specialist.
Q. And the name of your employer?
A. Google.
Q. And is there a particular division or do you work for YouTube or is YouTube anywhere in your job title?
A. I work --
MR. KEYES: Objection to form.

A. I work for YouTube, yes.
Q. And today we're in London. It's a bit gloomy and rainy outside because, I guess, it's January, but you understand that this is as if we're in a United States court with a jury?
A. Yes, I do.
Q. Okay. And you've been sworn in by a court reporter, correct?
A. Yes.
Q. And you understand that you're under oath today?
A. Yes.
Q. And we have a videographer, as you can see, so you understand that portions of today could be played to a jury on a video, correct?
A. Yes.
Q. Do you have any questions about this process before we begin?
A. No, I don't.
Q. The court reporter -- and I'm sure your lawyer has told you, we're going to try, both of us, not to talk over one another because it gets difficult for her to take down our testimony.
Also, you need to give a verbal response. Even though on the video you'll see you nod your

1 [redacted]
[redacted]
[redacted]
[redacted]
5 Q. You talk about ensuring COPPA compliance.
6 Do you see that?
7 A. Yes.
8 Q. How do you ensure COPPA compliance?
9 A. I'm not sure what I meant here but our
10 underage account policy is under -- is -- globally
11 prohibits under 13 accounts, and in our policy it
12 says because of COPPA compliance.
13 Q. It says here you review about 40,000
14 channels a week back in October through -- '21
15 through March of '22.
16 How many YouTube channels are there
17 globally, do you know?
18 A. I don't know.
19 Q. Any idea at all?
20 A. No.
21 Q. 100,000? 100 million? A billion? Do you
22 know at all?
23 A. I don't know.
24 Q. Do you know how much -- do you know what
25 percentage [redacted] is of the number of

YouTube videos that are online?
A. I don't know.
Q. Have you ever asked anybody?
A. No.
Q. So do you know whether [redacted] a week is what percentage of the total number of videos?
MR. KEYES: Objection to form.
A. No.
Q. If you turn the page, Number 4 says: Leading and managing the Underage Accounts operations by fully scaling the Athena classifier's auto actions by a further 100 percent in Quarter 4 (from 300,000 to 600,000 a week).
Do you see that?
A. I see that.
Q. What was the Athena -- if you know, the Athena classifier's auto actions?
A. The Athena classifier is detecting possible underage accounts, and auto action means it's not going to our team but straight to Age Verification.
Q. So what you're talking about here is the automate -- Athena, as an automated detection of underage accounts, went from the detection of 300,000 to 600,000 a week?

MR. KEYES: Objection to form.
A. That's what it says here.
Q. Okay. Is that what it means?
MR. KEYES: Objection to form.
A. Can you -- can you repeat?
Q. I'm trying to understand what you're talking about here. So it says that you fully scaled the Athena classifier's auto actions in Quarter 4, that it went from 300,000 to 600,000.
A. That's what it says here, yes.
Q. Right. So when you wrote this, did you mean that there was -- that you doubled the number of possible underage accounts going directly to account verifications?
A. Correct.
Q. And what did you have to do with scaling the Athena?
MR. KEYES: Objection to form.
Q. What was your role in that?
A. Just being in the loop, what type of accounts are coming to my team --
Q. And so --
A. -- and how many.
Q. And if Athena -- when Athena is in place, those are accounts that don't go to you or your

team, correct?
MR. KEYES: Objection to form.
A. Correct. Well, no. The more auto actions are taking, the less accounts are coming to our team.
Q. Okay. So if Athena is in place, it's sending more suspicious accounts directly to the Age Verification Team?
MR. KEYES: Objection to form.
A. I don't really understand the question.
Q. Okay. Does Athena help your underage accounts workflow?
A. We get case -- we -- the reviews we do are partially from Athena, from the Athena classifier.
Q. Okay. And what does the Athena classifier do?
A. I'm not an engineer, so I do not fully understand how that classifier works.
Q. Okay. Does it change what you receive?
A. Athena is detecting possible underage accounts and, with high precision, it sends it straight to Age Verification. With lower precision, it goes to my team for review, for human review.
Q. Okay. Do you consider your team human review?

C E R T I F I C A T E

I, Susan D. Wasilewski, Registered Professional Reporter, Certified Realtime Reporter, Certified Manager of Reporting Services, Certified Realtime Captioner, and Florida Professional Reporter, hereby certify that the witness named herein appeared before me on Wednesday, January 15, 2025, and was duly sworn.

I FURTHER CERTIFY that I was authorized to and did stenographically report the examination of the witness named herein; that a review of the transcript was requested; and that the foregoing transcript is a true record of my stenographic notes.

I FURTHER CERTIFY that I am not related to or an employee of any of the parties, nor am I related to or an employee of any of the parties' attorneys or counsel connected with this action, nor am I financially interested in the outcome of this action.

WITNESS my hand this January 29, 2025.

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Susan D. Wasilewski, RPR, CRR, CMRS, CRC, FPR