

AMENDED Exhibit 1174

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

[Privileged & Confidential]**Questions to Consider:**

A summary of the situation of YouTube in Schools in top-priority countries within each Region.

Things to consider for schools:

- usage (high, low)
- any concrete efforts or initiatives that can be examined as case studies
- powerful anecdotes of positive usage
- powerful anecdotes of frustration
- any major MOE relationships
- any major XFN relationships (e.g. Google EDU, GR, etc)
- regulatory issues

APAC**JAPAN:**

- usage (high, low)

middle

Use case really differ school by school. Some schools actively using YouTube in classroom and encourage students to use YouTube video for the pre-work and homework. On the other hand, some school completely prohibits YouTube access. The main concern for the latter use case is non-educational / not appropriate content students might be surfaced due to the variety of content offering on YouTube.

- powerful anecdotes of positive usage

Teacher create playlist for recommended video, and share it with students

School participating in YouTube video creation workshop through [HYPERLINK

"<https://www.google.co.jp/events/webrangers/>" \h].

- powerful anecdotes of frustration

Inappropriate content suggested by algorithm in classroom

- any major MOE relationships

YouTube creator Kan & Aki and MOE collaborated on awareness raising for programming education which will become mandatory subject in 2020. The series of 4 videos have generated 5M views.

- any major XFN relationships (e.g. Google EDU, GR, etc)

Kicked off first-ever cross-functional "Kids Edu JP" team in collaboration with Google for Education, Trust & Safety, CS Eng, GR, Consumer Marketing and Google Earth Education to

promote better alignment of country-wide education initiatives in Japan. Continuing to leverage the opportunities created by XFN teams to showcase YouTube's commitment to education. Also, started build relationship with educators and teachers to gather insights.

[REDACTED] - additional input for Japan)

Now that I'm hearing some real feedback from teachers from the Cloud Next event, i thought I'd share some feedback/wishlist from them I got today.

1) Google Classroom integration is not perfect: Especially on apps where we link off of the app and to main YT app. How can we keep students engaged on classroom app?

Also, I got pointed to the fact that Classroom embed player shows related videos. This should be turned off so that Classroom can be a safe environment for students.

2) Concern on Bandwidth: Bandwidth not enough to support all the students watching a video at the same time. Can we catche the video somewhere?

3) Content discoverability: This is even true for non English countries. They want to show videos to student (like scientific detailed video) but cannot find a good one. One solution we came up here was to search in English which worked well. What is the best way to showcase the contents on YT esp non English.

KOREA:

Things to consider for schools*:

- usage (high, low) : **Low**
- powerful anecdotes of positive usage : **We had a PR event promoting YouTube in the classroom. You can refer to [HYPERLINK**

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

[REDACTED]h].

- powerful anecdotes of frustration : N/A
- any major MOE relationships : **GR team has a good relationship with MOE.**
- any major XFN relationships (e.g. Google EDU, GR, etc)

We have a learning XFN team driving a learning project (Teacher as creator/curator project..) GR/PR involved

AUSTRALIA:

[From [REDACTED]

"We'll need to connect with our Google EDU team on this, as they are closer to schools and MOE's. For AU, I know there is a strong school usage in ACT, while QLD has not signed up for Google EDU, given data privacy issues (they want servers to be based in the state). Unsure what our

Commented [1]: [REDACTED] Please help us collate info for AU. Thanks!
Assigned to [REDACTED]

Commented [2]: [REDACTED]

Hi [REDACTED] and [REDACTED] we are putting together a global strategy for YouTube in schools. Are you able to identify what the usage of YT is like in schools in ANZ? Just high level would be great.
Reassigned to [REDACTED]

Commented [3]: Youtube is utilized quite heavily in schools in Australia and New Zealand. It is becoming a medium of instruction for classroom teachers trying to provide a different method of student engagement. It is typically the #1 consumer of bandwidth in most schools, which is also a concern in terms of network traffic. Schools have asked for a caching service for YT, so it doesn't consume all of their existing connectivity and potentially lead to increased international traffic costs.

Commented [4]: Thank you very much, [REDACTED]

Commented [5]: sorry I can't add anything here, only anecdotal insights that [REDACTED] has provided.

deals, reputation, and actual usage are like in Vic, NSW, Tas, SA, WA, NT. For NZ and SG, Google EDU has the whole country.

That would be [REDACTED] He does AU and NZ. The other idea is to reach out directly to [REDACTED], as he does Google EDU for all of APAC."

From [REDACTED] Youtube is utilized quite heavily in schools in Australia and New Zealand. It is providing a medium of instruction for classroom teachers trying to provide a different method of student engagement. It is typically the #1 consumer of bandwidth in most schools, which is also a concern in terms of network traffic. Schools have asked for a caching service for YT, so it doesn't consume all of their existing connectivity and potentially lead to increased international traffic costs.

INDIA:

- usage (high, low) -
 - Usage pretty high and positive in schools
 - Public school teachers WANT to use YT in schools eg. Gujarat and Vizag
 - Teachers use this for (i) Own research, (ii) showing to students, and (iii) flip learning
 - Schools/classes whitelist the YT
 - ILFS is the implementation partners
 - G4E in 1500 schools in India. Most schools don't block YouTube.
 - As part of pitch, G4E tell them they can block, because that has been an ask, but schools prefer not to.
 - Some schools are picky, esp. high end schools - they block everything, not just YT - first block, and then whitelist what they want (e.g. Winberg Allen in Mussourie) they may whitelist only Wikipedia.
 - Teach4India fellows use YT extensively in classrooms - need to check with them.
 - Public schools - funded by govt. (Govt. leaves it to G4E and school, they don't interfere or instruct)
 - Ask [REDACTED] from GD Goenka and [REDACTED] ma'am
 - NCERT - [REDACTED] ma'am
- powerful anecdotes of positive usage
 - [HYPERLINK "https://www.news18.com/news/india/teachers-day-2018-from-developing-apps-to-teaching-on-youtube-meet-the-teachers-who-made-a-difference-1868825.html" \h]
 - [HYPERLINK "https://yourstory.com/2018/03/digital-technology-government-schools-rural-india/" \h]
 - (we'll get some additional comments from teachers and the NCERT lead by next week)
- powerful anecdotes of frustration
 - (we'll get some additional comments from teachers and the NCERT lead by next week)
- any major MOE relationships
 - Not currently (Policy and GR not in contact)
 - Multiple entities and states, multiple depts.

Commented [6]: [REDACTED] will set up a GVC with them

Commented [7]: [REDACTED] Ma'am [REDACTED]

Commented [8]: Take contact from [REDACTED]

Commented [9]: Ask [REDACTED] and [REDACTED]

Commented [10]: Ask [REDACTED] and [REDACTED]

- Each state has a diff mandate (South bigger on open, others are tied up with other companies and don't even talk to G4E)
- IT dept vs. Edu dept - different approaches
- MHRD, NCERT, CBSE etc
- any major XFN relationships (e.g. Google EDU, GR, etc)
 -

BANGLADESH

Ayman Sadiq is improving access to education for young people throughout Bangladesh. He is the founder of 10 Minute School, a free online educational platform providing interactive videos, live classes, quizzes and smart books to students.

The school is run by Ayman and a team of 52 others, most of whom are students themselves. With over 40 million active users across all its channels, 10 Minute School is the largest free-learning platform of its kind in Bangladesh. It allows people to study a range of academic subjects and also teaches presentation and interview skills. In partnership with the Govt. of Bangladesh's ICT Division and the telecom operator Robi, 18,000 schools are now using 10 Minute School's resources in their digital labs to teach their students.

Ayman Sadiq received the [[HYPERLINK "https://www.queensyoungleaders.com/"](https://www.queensyoungleaders.com/) \l "about" \h] for his efforts to improve access to education for youth in Bangladesh.

Channel links: [[HYPERLINK "https://www.youtube.com/channel/UCL89KKkLs0tZKId-iIS3NGw"](https://www.youtube.com/channel/UCL89KKkLs0tZKId-iIS3NGw) \h] and [[HYPERLINK "https://www.youtube.com/channel/UCpeKK_DqdGSQqSPhLGphRiQ"](https://www.youtube.com/channel/UCpeKK_DqdGSQqSPhLGphRiQ) \h]

EMEA

UK

- usage (high, low)
- Powerful anecdotes of positive usage
- powerful anecdotes of frustration
- any major MOE relationships
- any major XFN relationships (e.g. Google EDU, GR, etc)

France

- usage (high, low)
- Powerful anecdotes of positive usage
- powerful anecdotes of frustration
- any major MOE relationships

- any major XFN relationships (e.g. Google EDU, GR, etc)

Germany

- usage (high, low)
- Powerful anecdotes of positive usage
- powerful anecdotes of frustration
- any major MOE relationships
- any major XFN relationships (e.g. Google EDU, GR, etc)

LATAM

Brasil

- usage (high, low)
- Powerful anecdotes of positive usage
- powerful anecdotes of frustration
- any major MOE relationships
- any major XFN relationships (e.g. Google EDU, GR, etc)

Mexico

- usage (high, low)
- Powerful anecdotes of positive usage
- powerful anecdotes of frustration
- any major MOE relationships
- any major XFN relationships (e.g. Google EDU, GR, etc)

Colombia

- usage (high, low)
- Powerful anecdotes of positive usage
- powerful anecdotes of frustration
- any major MOE relationships
- any major XFN relationships (e.g. Google EDU, GR, etc)

Chile

- usage (high, low)
- Powerful anecdotes of positive usage

- powerful anecdotes of frustration
- any major MOE relationships
- any major XFN relationships (e.g. Google EDU, GR, etc)

Peru

- usage (high, low)
- Powerful anecdotes of positive usage
- powerful anecdotes of frustration
- any major MOE relationships
- any major XFN relationships (e.g. Google EDU, GR, etc)

NA

United States

- usage (high, low)
- Powerful anecdotes of positive usage
- powerful anecdotes of frustration
- any major MOE relationships
- any major XFN relationships (e.g. Google EDU, GR, etc)

Canada

- usage (high, low)
- Powerful anecdotes of positive usage
- powerful anecdotes of frustration
- any major MOE relationships
- any major XFN relationships (e.g. Google EDU, GR, etc)