

AMENDED Exhibit 715

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

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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

-----/

This Document Relates to:

ALL ACTIONS

-----/

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER
VIDEO-RECORDED DEPOSITION OF CRISTOS GOODROW
VOLUME 2

(Pages 310 through 596)

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650 Page Mill Road, Palo Alto, California
THURSDAY, FEBRUARY 20, 2025

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1 THURSDAY, FEBRUARY 20, 2025

2 SAN FRANCISCO, CALIFORNIA

3 9:11 a.m. PST

4 THE VIDEOGRAPHER: We're now on the record.

5 Today's date is February 20th, 2025. This is a
6 continuation of Cristos Goodrow's deposition in the
7 matter of Social Media Adolescents

8 Addiction/Personal Injury Products Liability
9 Litigation.

10 The time is 9:11.

11 The court reporter is Lorrie Marchant and
12 will now swear in the witness.

13 CRISTOS GOODROW,

14 FIRST DULY SWORN/AFFIRMED, TESTIFIED AS FOLLOWS:

15 EXAMINATION BY MS. SIEGEL

16 BY MS. SIEGEL:

17 Q. Good morning, Mr. Goodrow. My name is
18 Audrey Siegel. I'm an attorney representing the
19 plaintiffs in this action on behalf of the MDL.

20 How are you doing today?

21 A. Fine. Thank you.

22 Q. My colleague, Glenn Draper, took some
23 questions yesterday on behalf of the JCCP. I'm
24 going to try not to be too repetitive, but bear with
25 me because sometimes it does take a moment to get

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1 back into the thread of the questioning; okay?

2 A. Okay.

3 MS. GALLO WHITE: I just want to state for
4 the record that we're starting a few minutes late at
5 plaintiffs' counsel's request.

6 MS. SIEGEL: Thank you.

7 BY MS. SIEGEL:

8 Q. And is there any reason today why you can't
9 give your best testimony?

10 A. No.

11 Q. Did you have the opportunity to speak with
12 your lawyers between the break last night and this
13 morning?

14 A. Yes.

15 Q. Can you tell me approximately how long you
16 spoke?

17 A. Maybe 45 minutes.

18 Q. Okay. And did you review any documents
19 between the end of your deposition yesterday and
20 today?

21 A. No.

22 Q. Okay. Great.

23 The first thing that I want to ask you
24 about is underage use of the YouTube platform.

25 So is YouTube aware that underage users,

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1 about five pages in. It says -- it looks like this
2 (indicating).

3 It says (as read):

4 "If YouTube must be age gated, it
5 will lead to more signed-out usage."

6 Do you see that page?

7 A. I do.

8 Q. And this particular document appears to be
9 about users under the age of 18. But is YouTube
10 aware that individuals, if presented with age gating
11 on YouTube, may just choose to use the service
12 logged out?

13 A. Well, I think that's a reasonable thing to
14 be concerned about.

15 Q. And why is that?

16 A. Well, because if the signed-in experience
17 isn't sufficiently compelling, then -- or easy to
18 use -- then people might instead use signed out.

19 Q. What do you mean by "compelling"?

20 A. If it doesn't contain the features or
21 content that people are looking for.

22 MS. GALLO WHITE: I'm sorry to interrupt.
23 I just want to state for the record that portions of
24 this document appear to be privileged and may need
25 to be clawed back. We'll allow questioning on it

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1 continue sending -- strike that.

2 MS. SIEGEL: Okay. Let's turn to the
3 next -- let's enter the next exhibit, which is going
4 to be internal Tab 45. It's in the other room.

5 MS. LEWIS: Perhaps.

6 MS. SIEGEL: Do we have Tab 49?

7 BY MS. SIEGEL:

8 Q. In 2019 was there a change from the
9 Watch Next feature to -- moved to being an infinite
10 feed?

11 MS. GALLO WHITE: Object to form.

12 THE WITNESS: I don't remember the year
13 that it changed, but probably around that time.

14 BY MS. SIEGEL:

15 Q. Okay. And why was that change done?

16 A. Because we wanted to help people find the
17 views they want to watch.

18 Q. Did it increase the amount of time that
19 users spent on YouTube?

20 MS. GALLO WHITE: Object to form.

21 THE WITNESS: It increased -- we think it
22 increased the amount of value users got from YouTube
23 as measured by time.

24 BY MS. SIEGEL:

25 Q. As measured by time.

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1 And so it did increase the amount of time
2 that users spent on YouTube?

3 MS. GALLO WHITE: Object to form.

4 THE WITNESS: I think it may have.

5 BY MS. SIEGEL:

6 Q. And it was designed to increase the amount
7 of time that users spent on YouTube?

8 MS. GALLO WHITE: Object to form.

9 THE WITNESS: It was designed to increase
10 the value that people get from YouTube. We measure
11 that, in part, by time.

12 BY MS. SIEGEL:

13 Q. What value -- strike that.

14 In this context, is there any way that they
15 would get what you're calling value without spending
16 more time on YouTube?

17 MS. GALLO WHITE: Object to form.

18 THE WITNESS: Well, we discussed that
19 before where people can get value out of simple
20 things on YouTube, finding answers to problems and
21 things like that.

22 BY MS. SIEGEL:

23 Q. We did.

24 But in the context of expanding Watch Next,
25 is the only way that Watch Next would -- that they

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1 would get an increased, what you're calling, value
2 from YouTube by spending more time on YouTube?

3 MS. GALLO WHITE: Object to form.

4 THE WITNESS: Not necessarily, but it's a
5 reasonable measure.

6 BY MS. SIEGEL:

7 Q. Can you give an example of a different
8 value -- of a different way that they would get
9 value by extending the Watch Next feed into an
10 Infinite feed?

11 MS. GALLO WHITE: Object to form.

12 THE WITNESS: Sure. If -- if the first few
13 things weren't what they were looking for and they
14 chose one of those and spent more time looking for
15 the thing that they couldn't find and -- but -- you
16 know, but instead we expanded the feed and put the
17 thing they were looking for a little further down,
18 then, yeah, expanding it would help them find more
19 value faster without spending more time.

20 BY MS. SIEGEL:

21 Q. Isn't the search function already used when
22 an individual comes to YouTube looking for something
23 specific?

24 MS. GALLO WHITE: Object to form.

25 THE WITNESS: Sure, that's one of the

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1 things they use. But oftentimes people watch a
2 video and then they're looking for something
3 specific and then they look through the Watch Next
4 to find it.

5 BY MS. SIEGEL:

6 Q. Okay. I'll direct you back to what was the
7 2019 Strategy Off-Site Two-Pagers.

8 MS. GALLO WHITE: Do you remember the
9 exhibit number?

10 MS. SIEGEL: It's 12.

11 THE WITNESS: Twelve.

12 BY MS. SIEGEL:

13 Q. Okay. So can I direct your attention to
14 4269572.

15 Is one of the reasons that YouTube
16 determined to change to an Infinite Watch Next feed
17 in order to compete with Facebook and Instagram's
18 monetization?

19 MS. GALLO WHITE: Object to form.

20 THE WITNESS: I don't know, but that's
21 not -- wasn't the main reason.

22 BY MS. SIEGEL:

23 Q. Can you read for me the "Problem Statement
24 and Background" section?

25 A. Yes. (As read):

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1 A. Yes.

2 Q. Who is Matthew?

3 A. Matthew refers to Matthew Mengerink.

4 Q. And who is -- can you repeat the last name
5 for me?

6 A. Mengerink, Matthew Mengerink.

7 Q. And what was Matthew Mengerink's position
8 as of February 4th, 2016?

9 A. I believe he was a VP of engineering.

10 Q. And is he still with YouTube?

11 A. No.

12 Q. And so these were very senior people who
13 would have been giving this presentation; is that
14 right?

15 A. No. This presentation would have been
16 given to them.

17 Q. I understand.

18 And so these were very senior people who
19 would have been present at the presentation; right?

20 A. That's correct.

21 Q. And would you have been present at this
22 presentation?

23 A. I would likely have been present.

24 Q. Okay. And so none of the senior people who
25 were present felt any need to object to the use of

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1 the phrase "addictive" to describe the app
2 experience; is that right?

3 MS. GALLO WHITE: Object to form.

4 THE WITNESS: I don't remember the meeting
5 well enough to know if that's true.

6 BY MS. SIEGEL:

7 Q. Have you ever heard anyone object -- well,
8 strike that.

9 Okay. In regard to Shorts, have you heard
10 of Shorts being referred to as "snackible
11 consumption"?

12 A. Yes.

13 Q. Okay. And what is meant by the term
14 "snackible consumption"?

15 MS. GALLO WHITE: Object to form.

16 THE WITNESS: I think what people mean is
17 that it's content that you can watch in little bits,
18 like when you're in line at Starbucks or waiting for
19 an Uber.

20 BY MS. SIEGEL:

21 Q. Do you think that snackible consumption is
22 likely to lead to time well spent on the platform?

23 MS. GALLO WHITE: Object to form.

24 THE WITNESS: Yes, I think so. I think
25 people in those moments sometimes want some

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1 distraction.

2 MS. SIEGEL: I'll mark this as Exhibit 31.
3 (Marked for identification purposes,
4 Google-YouTube-Goodrow Exhibit 31.)

5 BY MS. SIEGEL:

6 Q. And this is -- for the record, this is
7 Bates No. 02026373. And it's an e-mail from
8 [REDACTED] between him and [REDACTED]
9 and yourself, Cristos Goodrow, and [REDACTED]
10 and someone named [REDACTED].

11 Do you see that?

12 A. Yes.

13 Q. Okay. And 2018 is before Shorts was
14 introduced?

15 MS. GALLO WHITE: Object to form.

16 THE WITNESS: Yes, I think so.

17 BY MS. SIEGEL:

18 Q. Was there other snackable consumption on
19 the platform at that time?

20 MS. GALLO WHITE: Object to form.

21 THE WITNESS: I think there were short
22 videos that people might watch in a snacky kind of
23 way, yes.

24 BY MS. SIEGEL:

25 Q. And would Stories perhaps be another

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1 to unlock on-the-go usage. But that's one of the
2 potential uses for it, yes.

3 Q. Okay. And then it says (as read):

4 "There is a strong argument not to
5 pursue building such a feed at this
6 time."

7 Do you see that?

8 A. Yes.

9 Q. Okay. And could you read Bullet Point 6
10 for me?

11 A. (As read):

12 "Driving more frequent daily usage is
13 not aligned with our efforts to improve
14 digital well-being."

15 Q. And so at least at this time when this
16 strategy paper was written, it was believed that
17 driving more frequent visits would not align with
18 efforts to improve digital well-being.

19 Is that fair to say?

20 A. Well, that's what this says.

21 MS. GALLO WHITE: Object to form.

22 BY MS. SIEGEL:

23 Q. And yet, nonethe- --

24 THE STENOGRAPHER: I'm sorry, was there an
25 answer?

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1 THE WITNESS: That's what this says.

2 THE STENOGRAPHER: Thank you.

3 BY MS. SIEGEL:

4 Q. And so has there been some new research or
5 development that disagrees with this determination
6 that driving more frequent daily usage is not
7 well-aligned with our efforts to improve digital
8 well-being?

9 MS. GALLO WHITE: Object to form.

10 THE WITNESS: I would say that the rise of
11 short-form video is something people appreciate and
12 enjoy is a -- is a big change. It's a new
13 development.

14 BY MS. SIEGEL:

15 Q. How does the -- strike that.

16 MS. GALLO WHITE: State for the record that
17 counsel for the JCCP plaintiffs is interfering with
18 the questioning attorney, who's representing the MDL
19 plaintiffs, and we object to that interference.

20 BY MS. SIEGEL:

21 Q. Does "the rise of short-form video" mean
22 TikTok?

23 MS. GALLO WHITE: Object to form.

24 THE WITNESS: TikTok is one example of
25 short-form video.

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1 bedtime reminders have on a user's behavior on the
2 platform?

3 MS. GALLO WHITE: Object to form.

4 THE WITNESS: I suspect that we -- that
5 YouTube has measured it, yes.

6 BY MS. SIEGEL:

7 Q. Well, what do you think they've measured
8 about it?

9 A. I don't know specifically, but at the very
10 least how often it's used. Probably how often it's
11 set.

12 Q. What about how often people use -- end up
13 using less YouTube?

14 MS. GALLO WHITE: Object to form.

15 THE WITNESS: I don't -- I don't know what
16 else has been measured.

17 MS. SIEGEL: Okay.

18 MS. GALLO WHITE: For the record --

19 BY MS. SIEGEL:

20 Q. Do you think --

21 MS. GALLO WHITE: -- counsel for JCCP
22 plaintiffs is again interfering in the questioning
23 by counsel for the MDL plaintiffs. We object.

24 BY MS. SIEGEL:

25 Q. Do you think that YouTube ought to measure

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1 whether or not the take-a-break reminders and
2 bedtime reminders actually changed and make a person
3 get off YouTube?

4 MS. GALLO WHITE: Object to form.

5 THE WITNESS: I'm not sure. I think you
6 should probably measure its overall impact.

7 BY MS. SIEGEL:

8 Q. Do you --

9 A. My guess is, is we run an experiment where
10 we measure lots of things, including viewership.

11 (Stenographer interrupted for clarification
12 of the record.)

13 BY MS. SIEGEL:

14 Q. And I'm sorry, I -- I've now -- I'll get
15 better at interrupting you, I promise.

16 Do you think it's important to know whether
17 or not the digital well-being features are
18 effective?

19 MS. GALLO WHITE: Object to form.

20 THE WITNESS: Well, I -- that's how we are
21 going to be able to improve them. So, sure. We
22 should try to improve them by understanding how they
23 work now.

24 BY MS. SIEGEL:

25 Q. So if you don't know whether the features

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1 as they are designed now are actually having the
2 intended effect of helping users get off YouTube,
3 there's no way to improve them?

4 MS. GALLO WHITE: Object to form.

5 THE WITNESS: No. I think you could
6 probably figure out ways to improve them, but it
7 would be easier if you understood how they're
8 working now.

9 BY MS. SIEGEL:

10 Q. Thank you.

11 Then it says (as read):

12 "Give users choice and control."

13 It says (as read):

14 "Offer people opt-in solutions:
15 Tools to limit their usage and protect
16 their attention. Get consent
17 for/disclose noticeable experience
18 changes."

19 And so is there a reason that you felt
20 that -- strike that.

21 Could YouTube have designed whatever
22 bedtime and take-a-break reminders to be either opt
23 in or opt out if they wanted to?

24 MS. GALLO WHITE: Object to form.

25 THE WITNESS: Sure. I'm sure -- I'm sure

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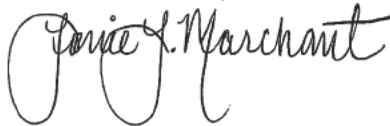
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STENOGRAPHER'S CERTIFICATE

I, LORRIE L. MARCHANT, Certified Shorthand Reporter, Certificate No. 10523, for the State of California, hereby certify that CRISTOS GOODROW was by me duly sworn/affirmed to testify to the truth, the whole truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place herein named; that the deposition is a true record of the witness's testimony as reported to the best of my ability by me, a duly certified shorthand reporter and a disinterested person, and was thereafter transcribed under my direction into typewriting by computer; that request [] was [X] was not made to read and correct said deposition.

I further certify that I am not interested in the outcome of said action, nor connected with, nor related to any of the parties in said action, nor to their respective counsel.

IN WITNESS WHEREOF, I have hereunto set my hand this 5th day of March, 2025.



LORRIE L. MARCHANT, RMR, CRR, CCRR, CRC
Stenographic Certified Shorthand Reporter #10523