

AMENDED Exhibit 730

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

HIGHLY CONFIDENTIAL (COMPETITOR)**30(b)(6) Deposition Notes**

Date: April 9, 2025

James Beser

TOPIC NO. IV.8: What parental controls and user protective settings (including digital wellbeing features) are available on YouTube (Main and Kids), and when the parental control or setting was implemented, and the general type of users to which the controls apply or were intended for, and whether the feature is unavailable on certain device types

	YouTube Main (including Unsupervised & Supervised Experiences)	YTK (U-13) (2015)	Logged-Out Use
Protective Features			
Age-appropriate content controls	Age-gated content requires log-in to an age 18+ account to view (unavailable to U-18 accounts) (since at least 2008) - Age-gated content includes: (1) creator-declared “racy” content; (2) classification by T&S team; and (3) MA+ classified content Restricted Mode (since 2010): - A browser or device level setting that gives users the option to not see comments on videos and to automatically filter out videos that YouTube has determined may contain teen+ content - Employed by a wide range of users including institutions in public spaces such as schools and libraries	Age-gated content inaccessible	Age-gated content inaccessible Restricted Mode available

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Mental health interventions in search	Crisis resource panels (since 2010): Available for sensitive search queries (e.g., concerning suicide, self-harm, human trafficking, domestic violence, and substance addiction) in order to connect users with mental health resources like the suicide hotline. Expanded in 2021 to appear on Watch Pages Further expanded at least by early 2024 to include “pause” pages that present the user with resources before they view the results of their sensitive query Sensitive Content Warnings (since before 2015): YouTube provides warnings on videos relating to certain topics like suicide and self-harm, to warn viewers before the video starts playing that it contains sensitive content Auto-complete safety (since at least 2019): YouTube removes risky queries from auto-complete suggestions Health content shelf (since 2021): When users search for certain health or mental health topics, the results page includes a shelf that displays specifically identified, authoritative health sources	Sensitive content inaccessible	Crisis resource panels, sensitive content warnings, auto-complete safety, and health content shelves available since each feature’s launch

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Parental Controls	Family Link: • Android (since 2017) ◦ Includes app and website limits, such as preventing download of certain apps or visiting certain websites, allowing parents to block YouTube entirely ◦ Controls for parents to set screen time limits • iOS (since at least 2018) ◦ Ability to create Family Link accounts and enforce YouTube app settings for signed-in users • Chrome OS ◦ Includes app and website limits, such as preventing download of certain apps or visiting certain websites, allowing parents to block YouTube entirely ◦ Controls for parents to set device screen time limits ◦ Preventing children from browsing in private or incognito mode when signed into Chrome or using a Chromebook Supervised Experiences (since 2021): • Supervised Experiences designed for tweens transitioning to YouTube Main • Parental controls include content settings for parents to choose	Parental controls available since inception. The YTK app was developed from the ground up with kids and parental supervision in mind: Built-in timer (since inception): allows parents to limit screen time Content controls for parents: • Ability to select age-based content levels (preschool, school age, or all kids) (designed for ages 4 & under, 4-8, and 9-12) (since 2015) • Ability to block videos or channels (since 2016) • Ability to handpick every video and channel that would be available to their kids on YTK (since 2018) • Ability for parents to share videos of their choosing from YouTube Main with their child Ability to disable search on YTK (since inception) Privacy settings (since 2016): allows parents to clear or pause	Once enabled on a child's device, Family Link blocks the ability of a child to access YouTube in a logged-out state absent explicit parental permission, in order to ensure that parental controls and restrictions are consistently applied at the device level. Device-level controls (including on screen time) are also available

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	content ratings for viewers 9+ (“Explore”), 13+ (“Explore more”), or 18+ (“Most of YouTube”) • Parents can block channels • Parents can completely disable autoplay (such that it cannot be toggled on) • Parents can turn off personalization by disabling and deleting YouTube History • Parents also have the ability to access their child’s history and can clear or delete portions of their child’s search and watch history in user settings, which can modify the type of recommendations that the child receives YouTube Teen Supervision (since 2024): • For teen users who post content, parents can see channel activity information and receive a notification when their teen uploads a video or starts a livestream Information is provided on the YouTube For Families Help Center for parents using Supervised Experiences and YouTube Teen Supervision	watch and search history Living Room (since late 2024 / early 2025): users can lock a YouTube Main profile so it is inaccessible by a YTK profile Parental controls available through Family Link, including to • Set content levels • Disable search Parental Guide publicly available to give parents resources for understanding their parental control options	

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Bedtime reminder	Available for declared teens on Android and iOS (since 2020) and default on for declared teens (since 2021) Expanded to Shorts in 2022 Revamped by 2023: • Full-screen take-over • Default bedtime window start at 10:00pm	N/A; YTK has a built-in timer	Available on Android and iOS
Take-a-break reminder	Available for declared teens on Android and iOS (since 2018) and default on for declared teens (since 2021) Expanded to Shorts in 2022 Revamped by 2023: • Full-screen take-over across both Shorts & long-form • Reduced the default setting from 75 to 60 minutes	N/A; YTK has a built-in timer	Available on Android and iOS
Time Watched Profile	Available on Android and iOS for all signed-in users (since 2018)	N/A; YTK has a built-in timer, and device level controls (including screen time metrics) are available via Family Link	N/A; device level controls (including screen time metrics) are available
Recommendations & Content Quality Classifiers (VIBE, UKQ, etc.)	Ongoing efforts to remove violative content, reduce low-quality, borderline, or risky (e.g., Minor Risky) content, as well as to filter and raise high-quality content	YouTube has an independent process for creating safe, high-quality YTK corpora that are also developmentally appropriate	Ongoing efforts to remove violative content, reduce borderline or risky (e.g., Minor Risky) content, and filter and

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	using various quality and content ratings classifiers on both YouTube Main and YouTube Shorts VIBE for declared teen accounts (since 2023) MFK designation applied to content that appears on YT Main, but is directed to a child audience: ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] Users can pause and/or delete all or a portion of their YouTube search and watch history at any time, which impacts personalized recommendations • Users can auto-delete history on a recurring basis at either 3 or 18 month intervals (or keep history on indefinitely) from their settings (since approximately 2019) ○ The default setting since 2020 saves search/watch history for 18 months, but	based on the age options available in YTK, and ongoing enhancements to YTK corpora video quality requirements over time Ability for parents to: • Limit personalization through parental privacy settings, including deleting and/or pausing watch and search history, which prevents personalization based on that user activity data • Handpick every video and channel that would be available to their child, which prevents their child from viewing any recommended content	promote high-quality content using various quality and content ratings classifiers on both YouTube Main and YouTube Shorts MFK designation applied to content that appears on YouTube Main, but is directed to a child audience Users can pause and/or delete all or a portion of their YouTube search and watch history at any time, which impacts personalized recommendations. Users can also access YouTube in incognito mode, which will limit personalization

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	users can still alter that default in user settings. Both clearing and pausing watch history in user settings disables personalized recommendations (since approximately 2023) Users can also remove content recommended on mobile Home and Watch Next pages using the “Not Interested” and “Don’t recommend channel” feedback options		
Reporting content/ channels/ comments	Signed-in users can report videos from the Watch and Home pages on Main. The ability to report inappropriate videos has been available since 2005 Users can also report inappropriate comments, live chat messages, playlists (since 2008)	There has been a “Report” (since at least 2015) and a “Block” (since 2017) option available from the video player The parental settings page for YTK has included a “Send feedback” option (since inception)	Logged-out users in California can report content via a webform (since 2023)
Engagement Features			
Autoplay	Users could use playlists to continuously play content using a Play All feature as early as 2006. Autoplay was introduced as an embedded feature before 2015. All users have the ability to disable Autoplay using the toggle on the watch page, as well as in settings (since at least	Autoplay is toggled-off by default (since 2021), and parents have the ability to “lock” the default Autoplay setting (since 2022)	All users have the ability to disable Autoplay using the toggle on the watch page

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	2018) Parents using Supervised Experiences can disable Autoplay completely in the parental control settings (since 2021) and all supervised accounts have Autoplay toggled-off by default regardless of parent intervention (since 2021) Autoplay is toggled-off by default for all declared teens, even if unsupervised (since 2021)		
Shorts	The content protections discussed above apply to short-form content as well Users can manage their Home feed by choosing to see fewer Shorts (since 2024) MFK Shorts island with all content protections available on YouTube Main and Shorts (since 2023) YouTube also provides educational notices to remind a declared user age 13-17 they are taking a public action when they first upload a public Short or switch a private Short to public (since 2021)	Not available as a separate surface	Available as a separate surface (since 2021)

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	YouTube Main (including Unsupervised & Supervised Experiences)	YTK (U-13) (2015)	Logged-Out Use
Like / dislike	Available to signed-in users only. Users originally gave feedback on a video in the form of a 1 to 5 star rating (starting in 2005). Users now give feedback in the form of a binary like/dislike option (since before 2015).	Not available	Not available
Subscribe	Available to signed-in users (since before 2015)	Users signed into a Kids profile can subscribe to most channels in YTK. Parents are able to view their child's subscriptions and unsubscribe or block channels (since around 2018).	Not available
Comments	Users can disable comments on their videos (since 2005). Users can also: • Hide comments from specific commenters across all videos on their channel (since before 2015) • Hold comments containing user-selected words and phrases for review before publication on their video or channel (since before 2015) • Hold comments containing links for review before publication on their video or channel (since 2017) Supervised Experience accounts set to the "Explore" content rating cannot view or leave comments. Supervised Experience accounts set to the "Explore	Not available	Not available

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	more” or “Most of YouTube” content rating can view read-only comments and cannot leave comments YouTube also disables comments in multiple circumstances, including: • MFK: Comments are disabled on videos designated as “MFK” (since 2020) • Minor Risky: Comments are defaulted off for a video or channel once the Minor Risky classifier identifies  YouTube provides educational notices the first time a user with a declared age between 13-17 posts a public comment to remind that user they are taking a public action (since 2021) YouTube also provides reminders before a user posts a comment that may be offensive to others to give users the option to reflect and/or edit the comment before posting (since 2020)		

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Livestream	Ability to livestream available only to signed-in users, and livestreams may not feature U-13 users who are not accompanied by an adult, regardless of whether the account is age verified  If a channel or live stream's audience is set as MFK, some features will be turned off or restricted, such as live chat and comments YouTube provides educational notices the first time a user with a declared age between 13-17 starts a livestream or livechat to remind that user they are taking a public action (since 2022)	Not available	Not available
Upload content	Available to signed-in users except for Supervised Experience accounts Privacy settings default to the most protective settings for uploads by users ages 13-17, such that their content is available only to users they choose to share it with (since 2021)	Not available	Not available

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	YouTube provides educational notices the first time a user with a declared age between 13-17 uploads public content or switches a private upload to public to remind that user they are taking a public action (since 2021)		
Notifications	Users can adjust notifications settings to turn notifications off completely, “bundle” notifications into a single daily digest, disable sounds/vibrations, and/or set “quiet” hours (since 2018). Notifications have been silenced by default between 10:00pm and 8:00am (since 2018)	Not available to U-13 YTK users	Not available
Data Collection/ Personalized Ads	No PII data collected and no personalized advertising for U-18 accounts (since 2022) or for Supervised Experience accounts (since 2021) No PII data collected and no personalized advertising on “MFK” content (since at least 2020) Special ads policies apply to all known/declared youth accounts. This includes a U-13 ads policy and a teen ads policy, both of which restrict sensitive ad content and categories All users have access to privacy and user control settings, such as deleting and/or	No PII data collected, no personalized advertising, and restrictive ads policies apply (since inception) Parents can provide an ad-free experience on YTK by subscribing to YouTube Premium from their own account	Logged-out users can disable personalized ads Google-wide Ads policies apply

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	YouTube Main (including Unsupervised & Supervised Experiences)	YTK (U-13) (2015)	Logged-Out Use
	pausing watch and search history, to prevent personalization based on that user activity data All signed-in users have the option to subscribe to YouTube Premium in order to disable ads		