

AMENDED Exhibit 735

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

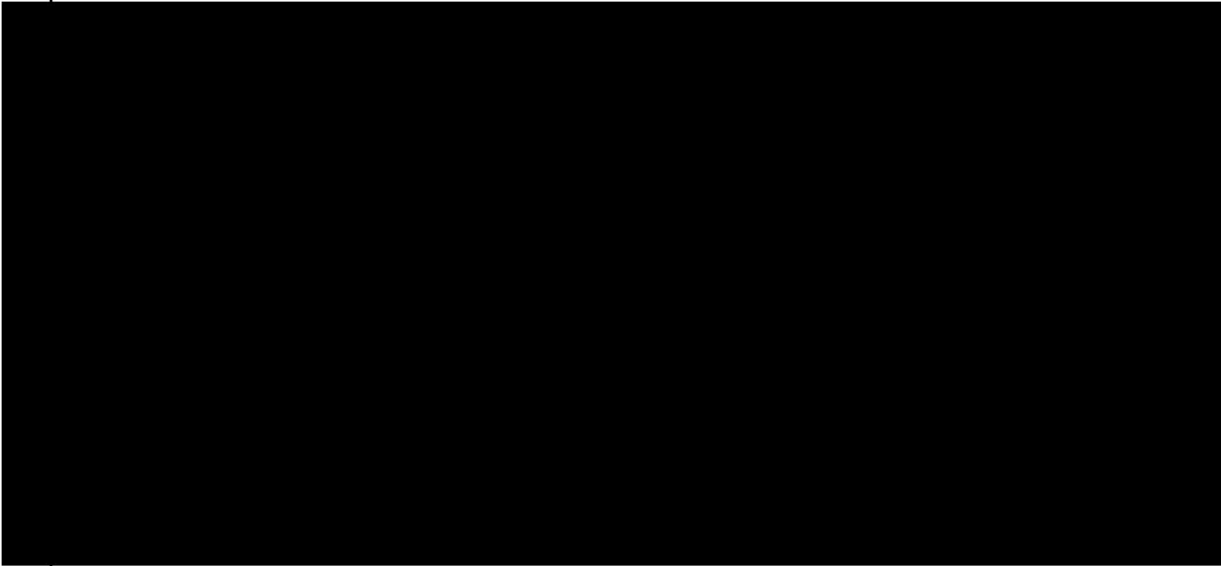
Policy Review Unified CR1: Young Teen Policy

April 2020
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Unified CR1 Policy and Rating Overview



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Goal:

Young Teen Policy was developed from the following principles:

- Balances user safety and appeal.
- Topics that put young teens at risk based on developmental factors
- Topics that bother teens most online
- Topics that teens seek out most on YT
- Transparent and explainable to creators and parents

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Under and over 15 on the developmental scale

13 to 15

- Changes in brain development predisposes **young teens to act more impulsively, show a greater tendency towards risk taking, and lead to an increased interest in riskier content**, including sexual content and absurd humor with adult themes
- **Executive functions aren't fully developed at this age** (e.g., self-regulation and decision-making capabilities)
- More **self-conscious** and concerned about how they appear to others
- **Stronger advanced reasoning skills** - no longer takes the world for what it is and will question what they watch and learn
- Develop an interest in **major global issues**

16 to 18

- Preference for riskier content begins to decline as a result of advancements in executive functions.
- Older teens' understanding of humor becomes more advanced and are able to grasp all forms of adult humor.
- Media preferences begin to mimic adults

Source: [Plugged In: How Media Attract and Affect Youth](#) by Patti M. Va kenburg and Jessica Taylor Piotrowski

13-15

- Significant changes in brain development lead to an increased interest in riskier content
- As young teens begin to develop and understand their sexuality, they look to media for advice on sexual situations and behaviors, so content that features sexual scenes or sexual innuendo are particularly appealing
- As young teens become interested in more complex forms of humor, content that pairs absurdist and irreverent humor with more adult concepts or taboos are particularly appealing (especially for boys)

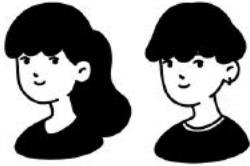
16-18

- Preference for riskier content begin to decline as a result of advancements in executive functions
- As older teens' understanding of humor becomes more advanced, they are able to grasp all forms of adult humor and their media preferences begin to mimic adults

18+

- Prefrontal cortex continues to develop
- Media preferences and humor mimic adults

Young Teen Policy Definition



- 1.
- 2.
- 3.

¹ **Research Validation**
abc

¹ O'Connell, 2003

Young Teen: Sex and Nudity

: & Safety



Sex.

As Young Teens begin to develop and understand their sexuality, they look to the media for advice on sexual situations and behaviors. However, young teens do not always understand the consequences of actions and are predisposed to engage in risky behavior despite being aware of the risks.

Nudity.

Being exposed to highly sexualized content is the top content concern reported by Young Teens. There needs to be sufficient educational or scientific context to balance the amount of nudity shown.

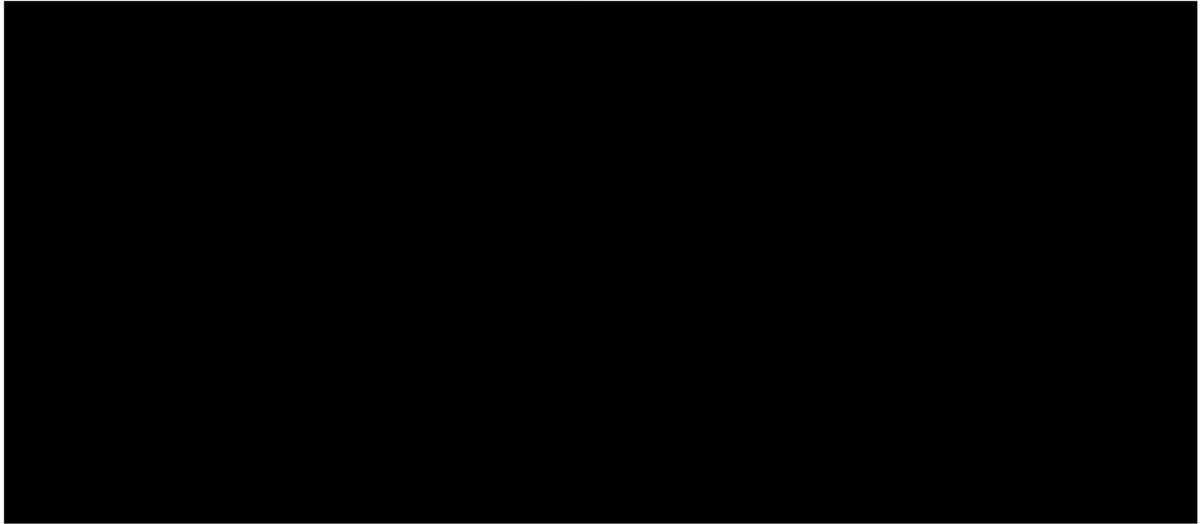
Young Teen Examples: Sex and Nudity

: & Safety

Pre-teen

Young Teen

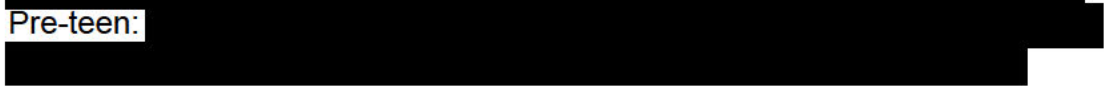
Teen



Pre-teen:

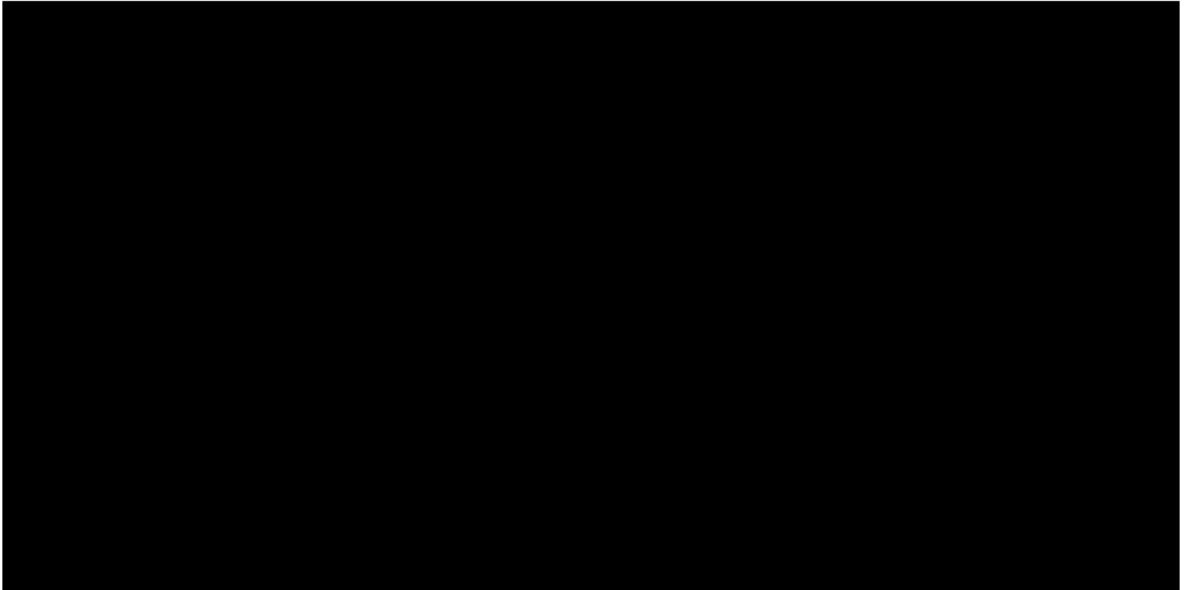


Pre-teen:



Young Teen Examples: Sex and Nudity

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[Redacted text block]

Young Teen: Violence

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Policy

Validation by Experts
or Research

Examples

Animated & Scripted Violence.

Research has shown exposure to such content may desensitize young teens to this type of violence and/or encourage and aggressive behavior. This is also the type of content that young teens report bothers them online.

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-

Real-world Violence.

Young teens are most bothered by graphic violence related to real-world events, as the factual nature and cultural importance of this type of violence makes it particularly upsetting.

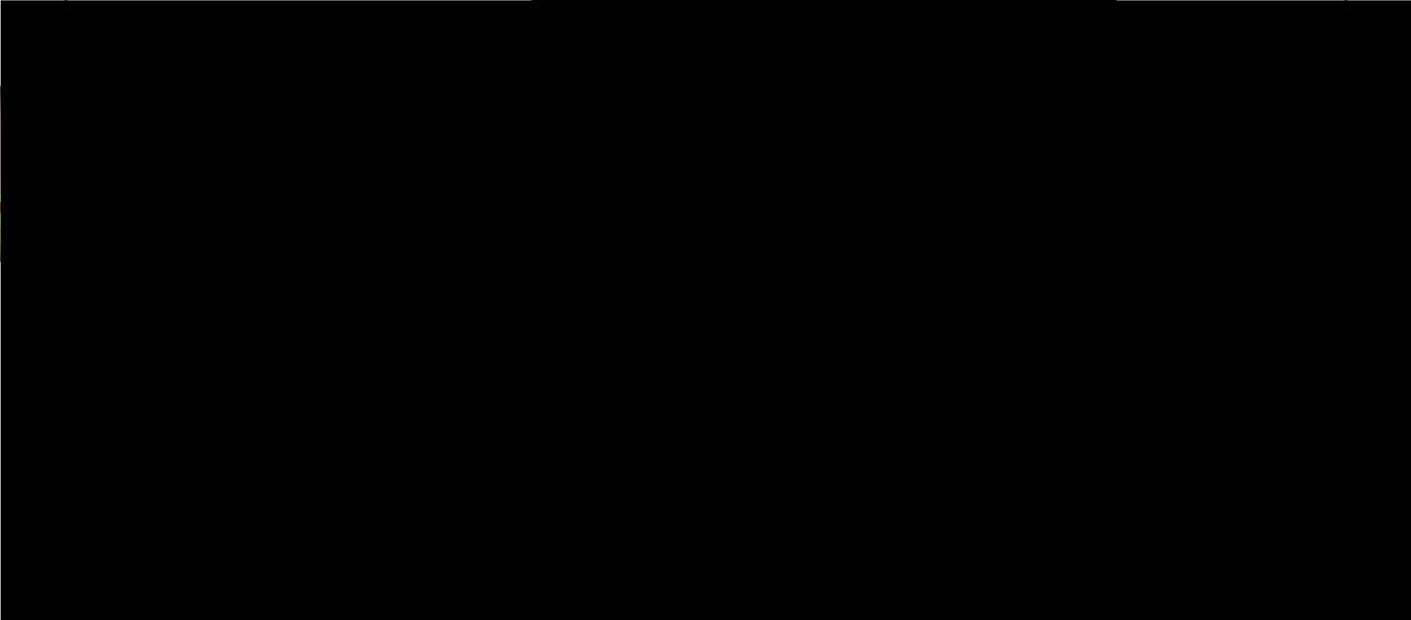
Exposure to VE content may incite young teens to adopt extreme political, social, or religious beliefs or commit serious violent acts.

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Young Teen Examples:

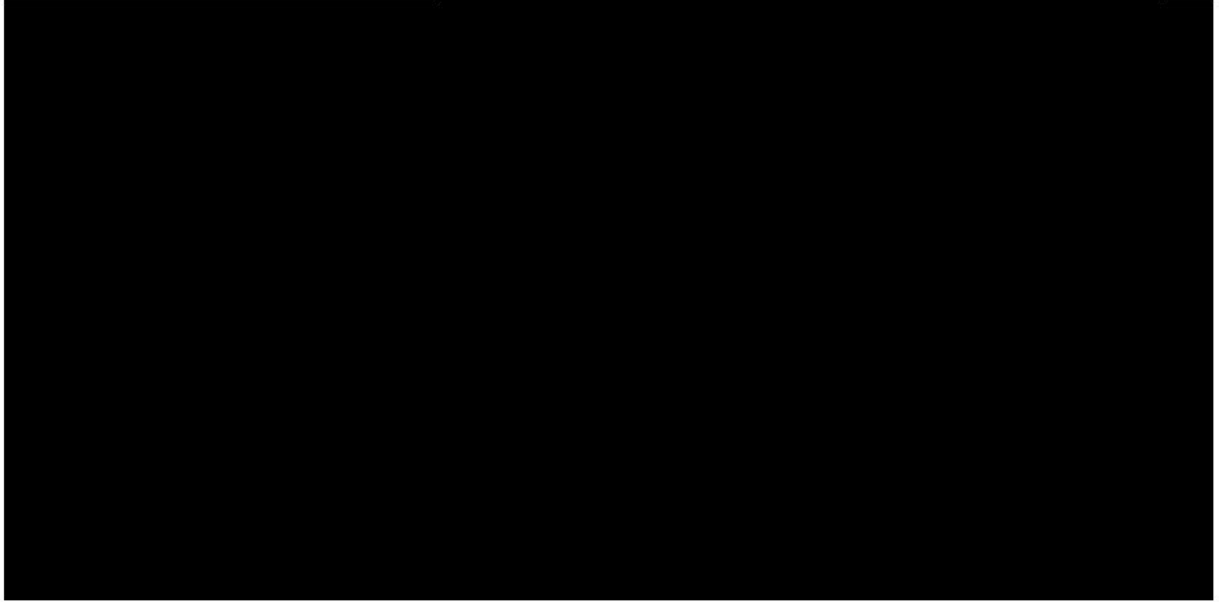
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Young Teen Examples:

& Safety



Young Teen: Inappropriate Language

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Policy

Validation by Experts
or Research

Examples

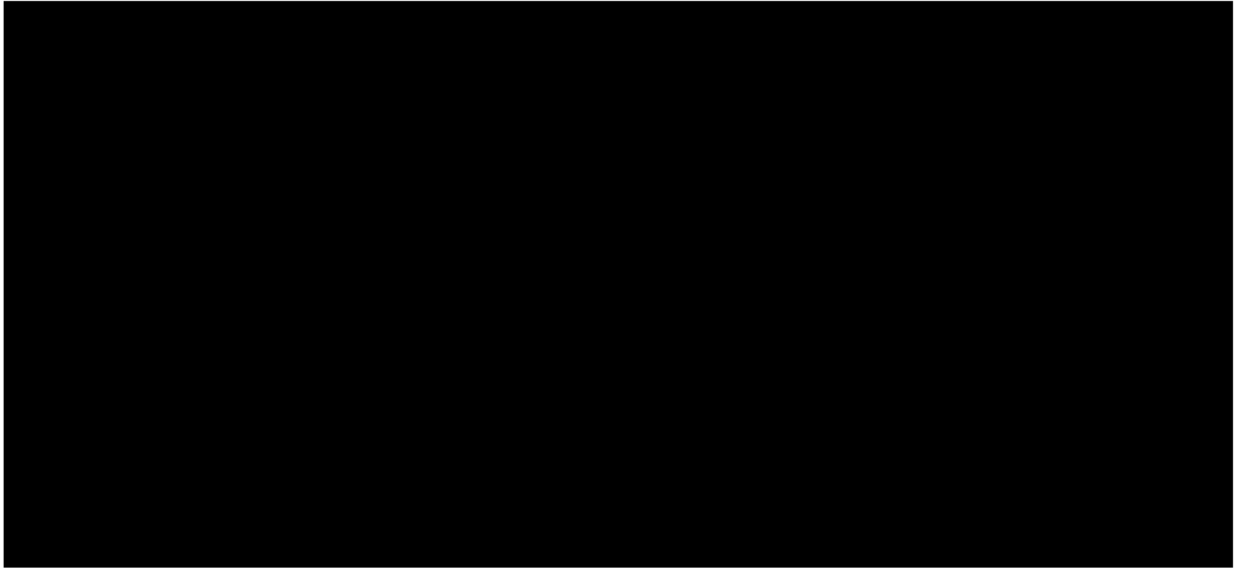
While swearing is a developmentally normal behavior for early adolescence, heavy exposure to expletives desensitizes young teens to vulgar/sexual language and increases the likelihood of imitation.

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Young Teen: Inappropriate Language Examples

: & Safety



Young Teen: Harmful & Dangerous

: & Safety

Policy

Validation by Experts
or Research

Examples

Dangerous Acts.

Significant changes in brain development during early adolescence also lead to an increased interest in riskier content. Neuroimaging studies demonstrate that young adolescents may experience greater emotional satisfaction with risk-taking behaviors, and this satisfaction can predispose them to engage in behavior despite being aware of risks.

Drugs and Alcohol.

Younger adolescents may be unable to understand the consequences of actions, link cause and effect in regard to health behavior, and be prepared to avoid risk.

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Young Teen: Harmful & Dangerous Examples

Pre-teen

Young Teen

Teen

Young Teen: Self Harm

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Policy

Validation by Experts
or Research

Examples

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Young Teen: Self Harm Examples

Pre-teen

Young Teen

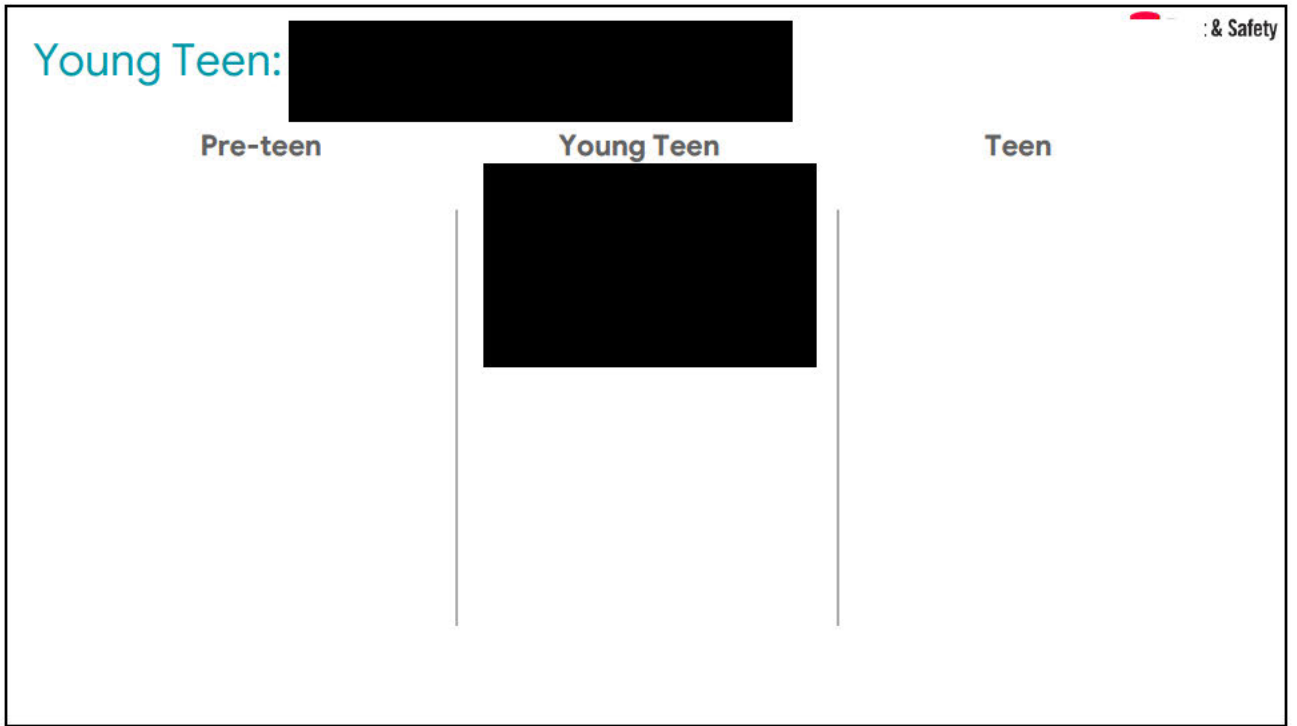
Teen

Young Teen:

Pre-teen

Young Teen

Teen





█: agrees that we should take a more protective stance on Interactions.
From █ *“engaging with a child elevates risk of harm”*