

AMENDED Exhibit 739

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



Our Goal

Normalize mental health among YouTube's users, particularly Gen Z, by increasing awareness of symptoms and resources for support across four key priority areas:



Anxiety &
Depression



Substance
Abuse



Suicide &
Self-Harm



Disordered
Eating

Our Approach

Expand on our previous literature review and trends scan to understand the following:

- How do these four conditions affect general users and Gen Z users in the US?
- What treatments or interventions are helpful in attacking these conditions?
- What trends are changing the landscape for each condition?
- What are companies or brands doing to address each condition?

Key Findings & Implications

Insight



Anxiety and depression are often linked to suicide, substance abuse, and eating disorders. The common root involves loneliness, an inability to identify and discuss emotions and feelings, and lack of healthy coping mechanisms to stress.



While these four conditions affect the US population broadly, specific subpopulations are more severely impacted by each condition. Understanding how their experience differs is key.



Social media has a key opportunity to provide support due to its scalability. Many, especially Gen Z, already use social media for information and self-treatment, but it can also produce negative effects when overused.



Prevention is critical. Early intervention can prevent more severe consequences and make it easier to treat the condition. Community or family-based treatments can provide lifetime support.

Implication



Consider ways to over-index on addressing Anxiety & Depression - which overlaps with other issues - by identifying and talking about feelings, developing emotional self-regulation, and building connections with others.



Provide content that speaks to the broader population affected by each condition but ensure targeted efforts are also made to those who are disproportionately affected.



Push the positive aspects of social media in providing helpful information, sharing experiences of recovery, and creating a sense of belonging. Work with thought leaders to provide a new venue for increasing access to treatment.



Collaborate with experts to proactively identify at-risk users and direct them to appropriate content and resources. Engage peers and families to help them learn how to support those experiencing a condition.



Risk factors for suicide include mental illness, social isolation, SUD, family history, childhood trauma, bullying, access to firearms, and barriers to care

- **Suicide** is defined as death caused by self-directed injurious behavior with intent to die as a result of the behavior.
- A **suicide attempt** is a non-fatal, self-directed, potentially injurious behavior with intent to die as a result of the behavior. A suicide attempt might not result in injury.
- **Suicidal ideation** refers to thinking about, considering, or planning suicide.
- **Self-harm** describes any behaviour where someone causes harm to themselves, usually as a way to help cope with difficult or distressing thoughts and feelings. It most frequently takes the form of cutting, burning or non-lethal overdoses.



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<https://www.nimh.nih.gov/health/statistics/suicide>

<https://www.newportacademy.com/resources/mental-health/self-injury/>

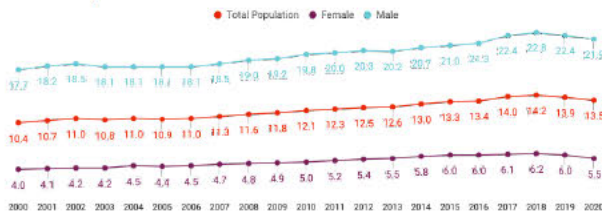
Suicide rates have climbed and while highest among middle-aged white men, have increased among racial and gender minorities

- The annual **US suicide rate increased 30%** between 2000 and 2020 to 13.5 suicides per 100,000.
- In 2020, 12.2M adults had serious thoughts of suicide, 3.2M made suicide plans and 1.20M attempted suicide.
- Firearms accounted for 52.83% of suicide deaths (2020).
- The suicide rate among males was 4 times higher (22.0 per 100,000) than among females (5.5 per 100,000).
- Rates of suicide were **highest for American Indian, Non-Hispanic males** (37.4 per 100,000) and, followed by White, Non-Hispanic males (27.0 per 100,000).
- Among females the rates of suicide were highest for American Indian, Non-Hispanic females (10.8 per 100,000) and White, Non-Hispanic females (6.9 per 100,000).

Suicide Rates in the US over time (2000-2020)

Age-Adjusted Suicide Rate (per 100,000)

Data Courtesy of CDC



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Suicide Rates by Race and Ethnicity (2020)

Age-Adjusted Suicide Rate (per 100,000)

Data Courtesy of CDC



2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020

<https://www.bu.edu/sph/news/articles/2022/us-suicides-are-stagnant-or-on-the-rise-among-many-groups/>

Self-harm and suicide rates have consistently increased among adolescents; sexual minority youth are at greater risk

Up to 25% of young people engage in self-harm and these rates have increased over the past 10 years. **Among girls aged 10 to 14, rates have increased by 166%** and girls aged 15 to 19 increased by 62%.

Suicide was the second leading cause of death among those 10-14 and 25-34, the third leading cause of death among those 15-24. **Between 2007 and 2018, suicide rates among youth (aged 10-24) in the US increased by 57%.**

Sexual minority youth are at higher risk—23% of students who identify as LGBTQ said they attempted suicide in the past year—far more than heterosexual students, 6%.

Teens are more vulnerable because their judgement and decision-making abilities are still being developed and they don't have the same social connections as adults. The prefrontal cortex doesn't fully develop until one's mid 20s which can make them more impulsive.

The percentage of high school students who seriously contemplated suicide increased from

13.8% (2009)

to

18.8% (2019).⁵

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<https://www.cdc.gov/childrensmentalhealth/features/anxiety-depression-children.html>

<https://www.hhs.gov/about/news/2021/12/07/us-surgeon-general-issues-advisory-on-youth-mental-health-crisis-further-exposed-by-covid-19-pandemic.html>

https://www.cdc.gov/nchhstp/dear_colleague/2020/dcl-102320-YRBS-2009-2019-report.html

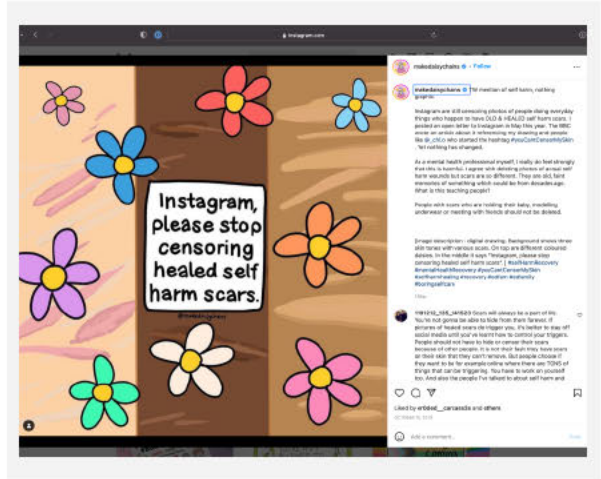
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6278213/>

Despite efforts to censor and remove inappropriate content, sometimes mistakes are made and users have found workarounds

Instagram postings on self-harm are rose significantly through 2018. In 2018, 1.2 million teen non-suicidal self-injury posts were identified by #selfharm, #hatemyself, #selfharmawareness, #cutting and #selfharmmm.

One study found social networking sites are used by suicidal and self-harming youth as a medium to communicate with and seek social support from others. **Greater time spent on these sites led to higher psychological distress and promotes self-harm behavior and suicidal ideation in vulnerable adolescents.**

Instagram does not allow any graphic images of self-harm causing users to argue the censoring of images of healed self-harm scars as it goes against body acceptance. Instagram has it has said it does allow content for the purposes of recovery and that if it makes a mistake and removes content, it works quickly to restore it.



<https://www.webmd.com/parenting/news/20211117/teen-social-media-posts-about-cutting-other-self-harm-are-soaring>
<https://www.bbc.com/news/health-48431858>

Strategies for preventing suicide are focused around access to care, protective environments, connection, coping and problem-solving skills, and risk identification

Strengthen economic supports

- Strengthen household financial security
- Housing stabilization policies

Strengthen access and delivery of suicide care

- Coverage of mental health conditions in health insurance policies
- Reduce provider shortages in underserved areas

Create protective environments

- Reduce access to lethal means among persons at risk of suicide
- Organizational policies and culture
- Community-based policies to reduce excessive alcohol use

Promote connectedness

- Peer norm programs
- Community engagement activities

Teach coping and problem-solving skills

- Social-emotional learning programs
- Parenting skill and family relationship programs

Identify and support people at risk

- Gatekeeper training
- Crisis intervention
- Treatment for people at risk of suicide
- Treatment to prevent re-attempts

Lessen harms and prevent future risk

- Safe reporting and messaging about suicide

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<https://www.cdc.gov/suicide/facts/index.html>

Sociocultural/Generational Drivers of Change

Organizations are addressing the higher rates of LGBTQ+ suicides, filling in care gaps, and addressing cyberbullying



Training Counselors for LGBTQ+ Cases

The Trevor Project reported that 45% of LGBTQ youth considered attempting suicide in the past year. Those who lived in an accepting community, had access to LGBTQ-affirming spaces, and/or felt high social support reported lower rates. The Trevor Project is now using AI to simulate cases and train staff and volunteers at scale.



988 Fills a Big Gap in Crisis Care

Starting July 16, 2022, people experiencing a mental health crisis can call the 988 Suicide & Crisis Lifeline to connect with a trained counselor. Previously, people experiencing a mental health emergency called 911 which generally resulted in a law enforcement response. Calling the number is an effective intervention in itself as close to 90% of people get what they need from the call.



Cyberbullying Is A Significant Risk Factor

Cyberbullying above and beyond traditional offline bullying is a independent risk factor for suicide. Researchers at the University of Pennsylvania recommend children and adolescents be routinely screened for cyberbullying to mitigate suicide risk.

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39

<https://www.thetrevorproject.org/blog/the-trevor-projects-annual-national-survey-reveals-upward-trend-in-suicidal-thoughts-among-lgbtq-youth-with-large-disparities-for-transgender-youth-and-lgbtq-youth-of-color/>
https://www.upi.com/Health_News/2022/06/27/cyberbullying-children-young-adolescents-suicide-study/4031656335090/
<https://www.npr.org/sections/health-shots/2022/07/15/1111316589/988-suicide-hotline-number>

Economic/Political/Environmental Drivers of Change

Funding and policy are working to reduce youth suicide while climate change is another risk factor



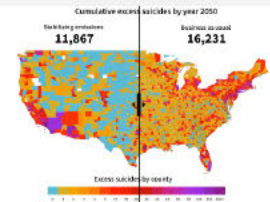
Youth Suicide Prevention Grants

The Garrett Lee Smith State/Tribal Youth Suicide Prevention and Early Intervention Grant Program provides funding to states and tribes for implementing prevention/early intervention strategies in schools, juvenile justice systems and foster care programs. Counties that received grants had lower rates of youth suicide attempts and deaths than those that did not receive funding.



Executive Order to Ban Discrimination Against Transgender Youth

President Biden recently signed an executive order which aims to expand access to gender-affirming care and find new ways to counter bills passed by states that ban treatments for transgender youth. It also asks federal agencies to not fund conversion therapy and encourages the placement of LGBTQ+ youth in supportive foster homes.



Climate Change's Impact on Suicide Rates

Researchers have shown that up to 21,000 additional suicides will occur by 2050 in the US and Mexico if unmitigated climate change continues. They also found hotter than average temperatures increase both suicide rates and use of depressive language on Twitter.

<https://www.apa.org/monitor/2019/07-08/cover-prevent-suicide>

<https://www.theguardian.com/us-news/2022/jun/15/biden-executive-order-anti-trans-laws-and-conversion-therapy>

<https://news.stanford.edu/2019/03/29/effects-climate-change-suicide-rates/>

Technological/Scientific Drivers of Change

Screening in key locations, with new technology can prevent suicide while Gen Z has found new ways to talk about it



Improving Screening in New Locations

UMass Medical School implemented universal suicide screening in ERs. Patients identified as being at risk received an intervention that involved assessment, brief intervention, discharge resources, and follow-up phone calls. Those who received the screening and intervention had 30% fewer total suicide attempts in the next year.



Using AI to Identify Those At Risk

Researchers have developed a machine learning algorithm for Twitter data to identify people at high risk of suicide. This proactive identification of suicide risk in real time can deliver interventions more readily which can have a significant impact.



"Unalive" Instead of "Suicide"

Gen Z is using "una ive" to get around TikTok censors. Google searches for "una ive" have spiked in 2020 and has spread to most social media sites. YouTubers use it to ensure their content isn't demonetized. While the word can refer to suicide, murder, or death, its use raises questions of stigma and fears around explicit conversations about suicide.

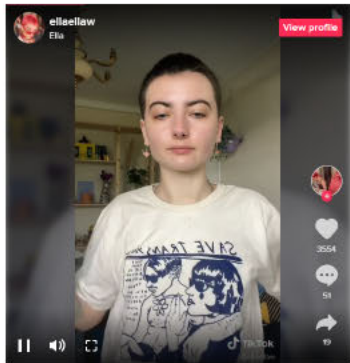
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41

<https://www.apa.org/monitor/2019/03/trends-suicide>
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4886102/>
<https://www.wired.com/story/algorithms-suicide-unalive/>

WHAT WE'RE SEEING FROM THE INDUSTRY

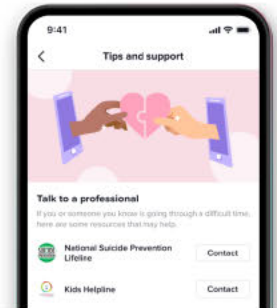
TikTok's theme for 2022 focused on loneliness, a key driver behind suicide, and banned discriminatory practices against LGBTQ+



TikTok launched a new series of #TikTokUnpacks where they partnered with creators to speak about loneliness.



TikTok updated its guidelines to ban deadnaming, misgendering and misogyny. The app also added a feature allowing users to add pronouns to their profiles.



TikTok provides an in-app resource list of crisis hotlines such as the Crisis Text Line whenever someone searches for #suicide. It also shares information on how to engage safely with someone who may be in crisis.

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<https://www.npr.org/2022/02/09/1079643611/tiktok-bans-deadnaming-misgendering>

<https://www.latimes.com/lifestyle/story/2022-01-05/those-struggling-with-mental-health-have-found-validation-on-tiktok-heres-how>

<https://www.nbcnews.com/pop-culture/pop-culture-news/tiktok-has-new-mental-health-resources-its-users-some-experts-n1279944>

YouTube can speak overtly about suicide and provide resources to Gen Z to help develop coping skills that can prevent suicide

Strategy

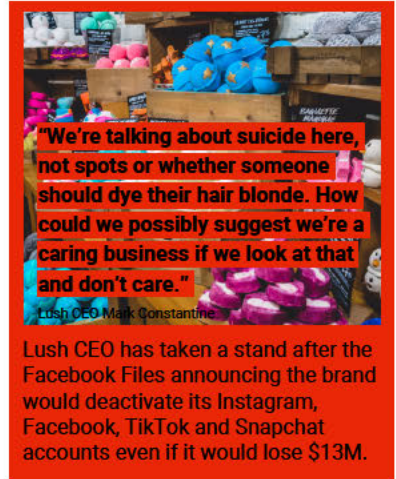
- Address suicide across multiple audiences, particularly racial and ethnic minorities and LGBTQ+ communities

Content

- Discuss how to cope with transitions in life, build connections with others, and regulate one's emotions, especially in Gen Z which is still developing their executive function
- Use terms, such as "unalive," to speak candidly and reduce the stigma around suicide and self-harm
- Address fears of climate change as they contribute to feelings of despair

Experience

- Support those working on suicide prevention and treatment by offering users' stories to help train counselors
- Ensure algorithms are feeding recovery-themed content at at-risk populations



<https://businessinsider.mx/lush-ceo-happy-to-lose-13m-deleting-social-media-accounts-2021-11/>

Questions for Future Exploration

- What does Gen Z think about the features and initiatives implemented by social media companies to address mental health?
- What type of content resonates with the different subpopulations dealing with these four conditions?
- How effective are mental health treatment programs that use social media as a key resource or channel?
- Do 'log-off movements' reduce rates of mental health conditions?
- Does partnering with mental health organizations or validated, evidence-based solutions increase access?
- What attributes of online community building best attack loneliness and social isolation?
- How does the changing economic environment affect these four key mental health conditions?

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