

AMENDED Exhibit 745

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



CONFIDENTIAL

GOOG-3047MDL-01614173

Learning content base that makes education **pop**

Creators

950K edu channels, 625M subs

		Subs	Q3 WH
	Ted Talks Ideas worth spreading from stage to screen	14M	23M
	Vsauce Vlog style experiments for curiosity junkies	11M	6.8M
	Crash Course Curriculum based. Humanities - Science	5M	4.4M
	Khan Academy Curriculum based, chalkboard style tutoring	4M	4.9M
	Braincraft Psychology, human behavior & neuroscience	320K	98K
	Acapella Science Higher education science. to song	60K	12K

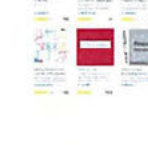
Countries

Governments investing in video learning

	India open university-level classes offered through courseholder 1M WH/quarter
	Thailand digital edu initiative built on YT to reach 400K teachers
	Brazil access to test-prep resources for millions of students 2.2B views

Contextual

3rd party space is crowded!
no real winner

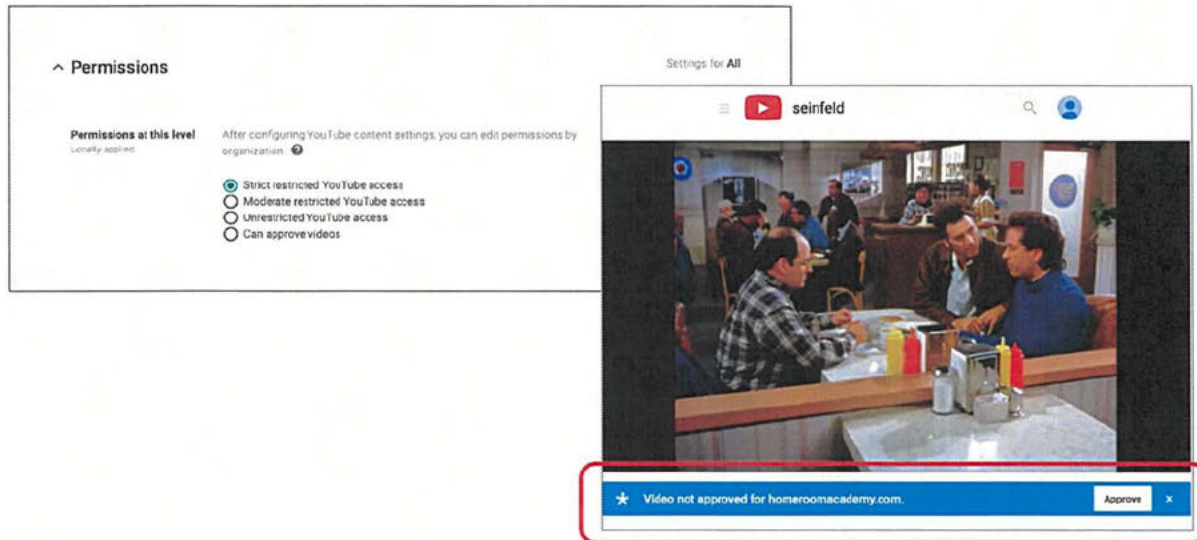
	Curiosit search & learning links and embeds
	EdPuzzle teachers quizzes and more
	tes teacher's with IT a share on teachers

Google

Source: Google Analytics

Managed Restricted Mode (MRM) overview

Launched in Summer 2015, MRM allows School admins to filter the corpus available to their students



MRM is a version of Restricted mode that allows school admins set the corpus -level restricts for their students based on via labels and whitelisting
These screens are the view a School/district admin sees today.

Despite MRM launch, many schools still block YT

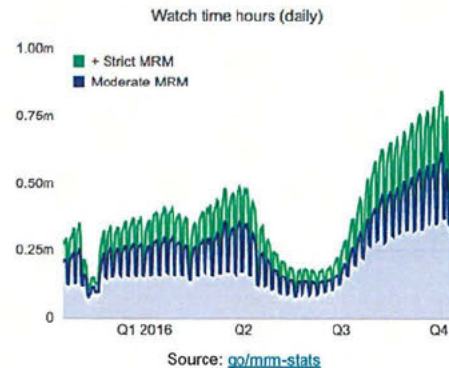
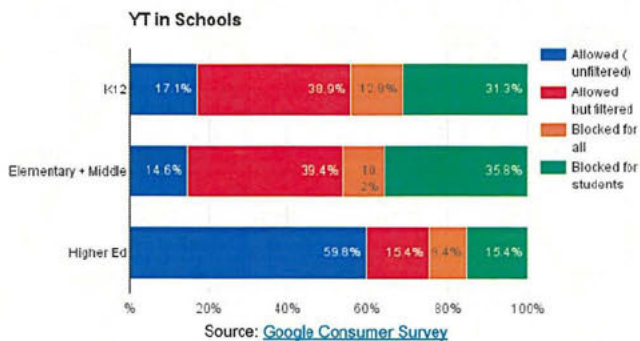
Safety concerns and ads are the top-cited reasons, there is also low market awareness

From a survey of teachers, ~45% of K12 US schools block YouTube for students

- When allowed it's filtered (only some using MRM)
- Ads are an issue for majority of teachers

Managed Restricted Mode helping, slowly

- Used by 3% of GSuite EDU domains (4k of 115k, [plx](#))
- 2.5M sessions per day
- 770K WT hours per day



The in-market name for MRM is: **YouTube Settings for G Suite**, not very memorable!

YT MRM: Options from here

Option #1: Status Quo

- MRM remains in Maintenance mode
- YT will help with Bugs, no new features

Option #2: Status Quo++

- Improve MRM on YT Main (controls to limit sharing, limit ads to KFA, etc)
 - Potential to leverage Unicorn Main work?
 - Would need to add web support, among other things...

Option #3: Merge w/YTK

- Merge with the YTK corpus safety/parental controls to Schools/Administrators
- Longer-term: Potential to add MRM support to YTK and offer a YTK version for schools

Options:

- 1) Status quo
- 2) Status quo+: Improve MRM on yt main (KFA, sharing options,) - could we leverage the YT Main work the Unicorn team did plus integrations with classroom/chrome? (ping [REDACTED])
- 1) Merge MRM work with the safety work YTK team is doing, extend filtering and controls to Main in Schools

YT Learning: Proposed next steps

- **Research**
 - Create a product playbook to focus on needs of initial target user group
 - Align with Primer: Determine a good first vertical on which to focus (ie. physics)
 - HaTS surveys for baseline satisfaction with search results, recs on learning content
- **YT for Learners: Run experiment on YT (WIP)**
 - Approximate a 'learning session' (i.e. 10% of "Linear Equations" queries on YT.com)
 - Remove p13n from WN (i.e remove Will Farrell)
 - assess WT/DAV impact
 - Recruit 20%er SWE(s) to help
- **MRM: Firm up reasons for high blocking rates among schools**
 - Do light-weight outreach to a few schools and filtering companies ([example](#))
 - Note: Unlikely to make tangible progress on MRM with current staffing.
- **We'll continue to push this forward when/if possible with 20%ers**
 - Hard to commit to timelines or milestones
 - Progress will be slow...

Appendix

Make Education Pop: Tentpole headlining our offering

Tentpole to lift corpus + fill content gaps

moving

You know how Lin-Manuel Miranda made history cool on Broadway with *Hamilton*? Let's pair popular, non-Edu YouTube voices with educators / edutubers to create inspiring, learning content

Popular Voices



+

"Boring" Subjects



=

Made Relevant



Build content that's accurate, and awesome

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YouTube

http://www.globalpartnership.org/sites/default/files/styles/detail_page_800/public/education-and-the-global-goals-10022015.jpg?itok=wJm1jhA8
<http://www.getbettergradesnow.com/blog/wp-content/uploads/2010/09/Education-Around-The-World-Infographic.png>

The poor state of education; the increasing cost of education; the lack of access (170M school age kids not in school - josh has the actual detail); edu iniquities lead to lifelong iniquities and a deeply stratified society; a quote of education being the light that helps bring societies together and lift the under accessed and resourced. Also -- Secondary: Education can be boring - YT, given it's relevance, can bring the fun

Let's have a whole slide about the strong social need. This is not a nice to do - this is a social responsibility and obligation

maybe what we say is that all these are great, but haven't made a consumer dent.. they've made a niche teacher market dent - which is great! we want to do something similar to what they're doing -- but FUN

Why hasn't MRM solved this problem?

1

Awareness

- Because MRM is not a school-directed product, can't market to schools
- Most schools (and the filtering companies they employ) don't know about existing MRM solution
- Current naming isn't descriptive enough to market itself (YouTube Settings for G Suite)

2

Feature gaps

- MRM only meets baseline needs
- Schools want to enforce intra-domain sharing (disallow public sharing)
- Doesn't work with other tools they use (Classroom and Chromebooks)

3

Compliance

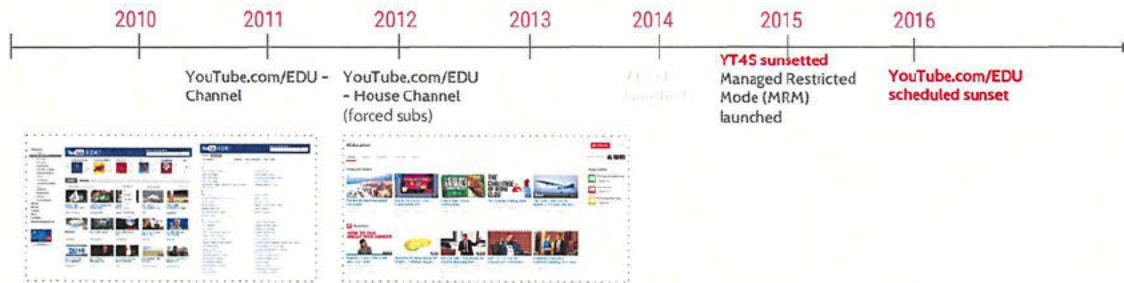
- YT ToS explicitly prohibits use by <13 users
- Ads and related videos are distracting and problematic

Context: YT Learning has been a perpetual 20% project

Internal
Demand

"There were choruses of cheers when YouTube announced the official launch of its YouTube for Schools feature today." ([source](#))

"So many people have this issue and we are getting no help! I am *frustrated* just like you! It seems this problem has existed for over a year now and the only conclusion I can come to is that Google does not care about education!" ([source](#))



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YouTube

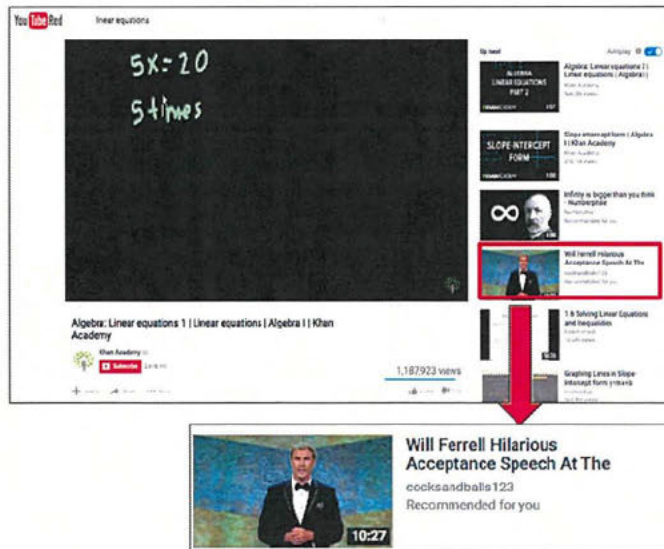
YT MRM: Proposed next steps

1. Staff a team to improve MRM, potentially by extending YT Kids Parent controls to School Admins
 - Add controls to limit public sharing
 - Implement a school-friendly ads policy
 - Comply with regulations (COPPA, CIPA, Student Privacy Pledge), including data use/targeting
 - TBD: Make YouTube a G Suite core service
2. Conduct user research with school admins that still block YT
 - Develop baseline metric to track progress (# of schools still blocking YT)
3. Market the solution (start with current MRM)
 - Close awareness gap (MRM) among schools and filtering companies
 - Fix naming (currently "YouTube Settings for G Suite")

Options:

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What we know: what makes learning on YT hard?



1 Hard to discover content

- Disorganized
- Unclear video quality/credibility

"Which of these will best help me learn?"

2 Hard to stay engaged

- YT too good at distraction
- Weak "episodic" organization

"Hard to do my homework when I could be watching Will Ferrell?"

3 Hard to measure mastery

- No user assessment

"I watched it, but am I ready for my test?"

- Discovering content, determining what is 'good' and then staying engaged
- Disorganized
 - Youtube has a lot of great content, but it's a disorganized library
 - Feedback from GAFE admins
 - Broken UI for learning - long videos lack navigation to different steps/sections, leading to lots of scrubbing, feeling inefficient use of time
- Trustworthiness
 - "inability to check how legitimate the source is"
 - Leads to lots of trial and error on videos, which leads to frustration
- Distracting
 - Learning is a top reason people come to YT, but very easy to get distracted
 - We don't yet have a way to measure the level of distraction (more on that soon)
 - You can see in this example, I started this session with a 'linear equations' query, clicked on a learning video and within 5 videos WN gets to a Will Ferrell hilarious acceptance speech - from CocksandBalls123!