AMENDED Exhibit 752

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

Education's "Graduation" Day

[redacted]

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Proposal:

Make EDU a P1 vertical because:

- We have ecosystem pressure
  - Khan, MITx, edX threatening to pull content
  - Coursera wants to use YT but can't
  - Tons of investment happening around us (Apple, Netflix, Zuck, George Lucas, Gates)
- Building the domain does not fit in with core needs
  - Can not fit it in with any existing efforts

Else, make it a P4

- Be transparent externally and internally,
  - Reset expectations
- Kill YouTube for Schools and EDU Browse

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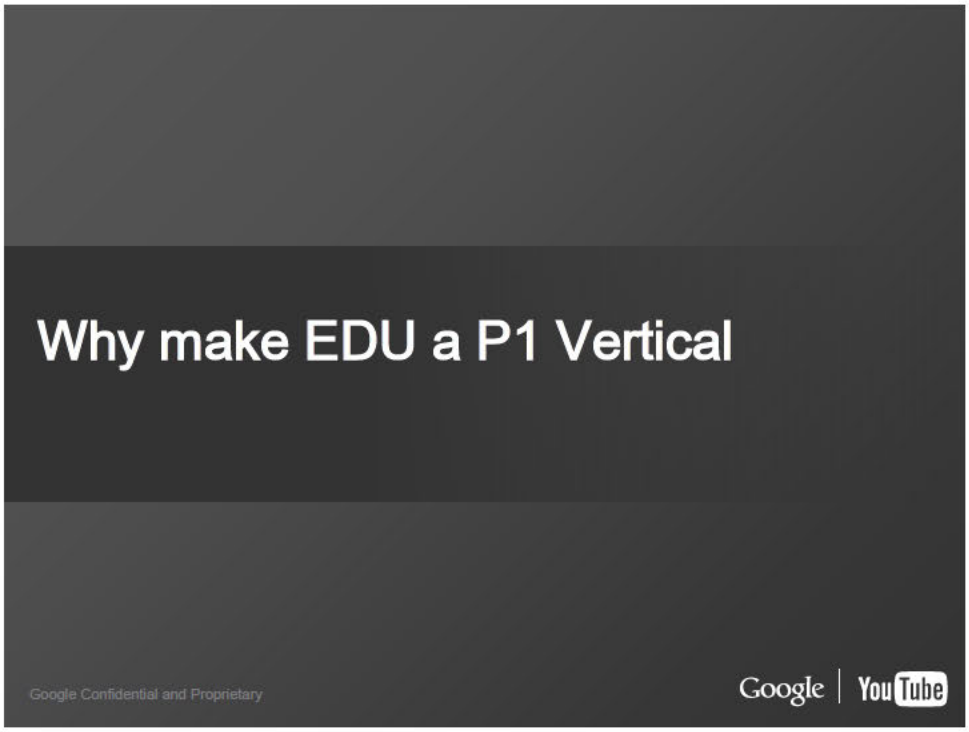
Slide 1

1	I don't think Defense should be our strategy. I suggest to build a case for offensive strategy instead. [redacted]; 11/7/2012 4:01:49 PM
2	What is the trade off? Is this incremental headcount, or something else gets deprioritized. If so, what? [redacted]; 11/7/2012 3:59:18 PM



EDU has opportunity to be key driver of view growth. If everyone [redacted] agrees, we can skip this section.

Imagine a world where...

Parents ask their children "Why aren't you watching more YouTube?"

Children from small villages can become engineers and doctors

Teachers can uplevel their classroom by curating the best videos against their syllabus

School Administrators shift budgets from Textbooks to YouTube subscriptions

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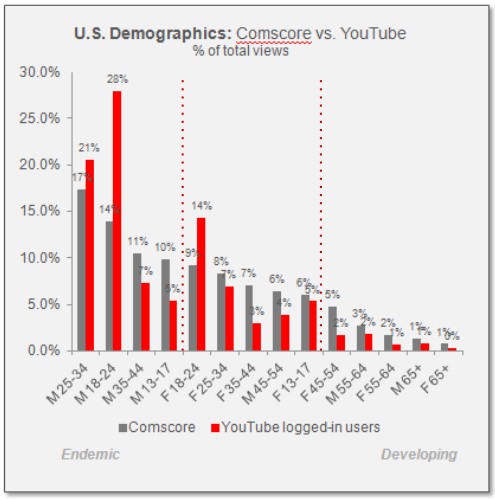
EDU content fits well with our endemic demos

Country → Plumbing → Faucets



YouTube logged-in users skew significantly toward ages 18-24 & away from 35+; use comScore as "truth"

Preliminary categories:

- ***Endemic (52% of views):*** top 4 segments; males 13-44
- ***Adjacent (37%):*** next 5 segments; primarily females 13-44
- ***Developing (11%):*** last 5 segments; ages 45+

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EDU Funded Channels: top performers

Top Performers By Watch Time

Channel Name	W1	W2	w/o/w	Cumulative
thewarnersound	475,437	453,233	-0.05	7,276,757
sourcefed	153,510	126,355	-0.18	5,204,564
motortrend	228,480	217,092	-0.05	3,661,179
vice	397,048	332,828	-0.16	3,490,747
noisey	61,868	74,538	0.2	2,373,116
entv	52,030	63,461	0.22	1,896,407
geekendsundry	75,551	66,274	-0.1	1,889,316
drive	73,301	76,604	0.04	1,854,610
shutupcartoons	53,302	50,409	-0.05	1,736,211
ycmyomf	33,890	22,264	-0.34	1,538,907
wwefannation	38,365	40,053	0.04	1,499,632
tomorrowlandchannel	375,330	656,727	0.75	1,322,324
crashcourse	44,238	45,412	0.03	1,112,669
scishow	42,713	27,679	-0.35	915,555
monotransistor	18,850	21,134	0.12	886,911
ridechannel	29,953	31,413	0.05	779,574
nuevon	107,965	73,616	-0.32	724,616
nerdist	24,423	42,492	0.74	719,381
start	22,820	25,486	0.12	700,381
redbull	32,874	29,007	-0.12	669,167
clevvermews	44,355	42,953	-0.03	618,561
mymusicshow	26,591	25,587	-0.04	615,907
dancepm	12,745	12,013	-0.06	581,895
numberphile	37,450	31,203	-0.17	580,396
mmafightingonsbn	39,040	26,545	-0.32	552,934

Highlights / Takeaways

- Most metrics will continue to be dominated by top performers like TheWarnerSound and SourceFed, but…
- Channels like VICE, G&S, and **Crash Course** have demonstrated that viewers are willing to watch longer form content on YouTube

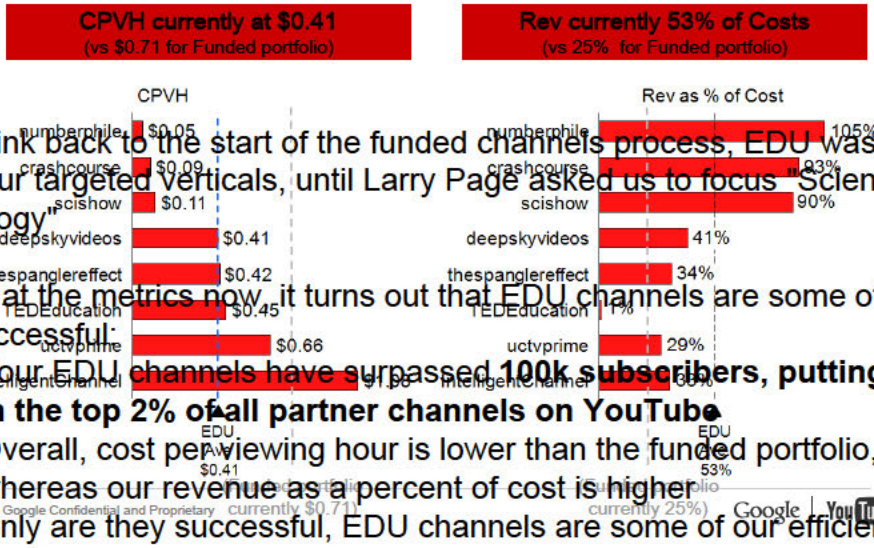
Other stats about 13 EDU Funded Channels, $14M investment:

- 4 channels have >100K subs; 2 have ~250K subs, putting them in the Top 10 of all funded channels.
- -CPVH of 2 most successful channels (~$0.10) is significantly below total funded portfolio average.

Numberphile has the highest ROI out of ALL funded channels (projected to recoup 314% of our investment), it's one of the most efficient (~$240 cost per minute), and the audience is highly endemic (~60% <35 yrs old).

Engagement is really strong as well. Numberphile hit the 100k subscriber mark in August and is already almost at 200k just 3 months later. Brady, the creator, also has two other channels that also have over 100k subs (periodicvideos, sixtysymbols).

EDU Funded Channels are some of the most efficient



If you think back to the start of the funded channels process, EDU wasn't even one of our targeted verticals, until Larry Page asked us to focus "Science & Technology"

Looking at the metrics now, it turns out that EDU channels are some of our most successful:

- Four EDU channels have surpassed **100k subscribers, putting them in the top 2% of all partner channels on YouTube**
- Overall, cost per viewing hour is lower than the funded portfolio, whereas our revenue as a percent of cost is higher

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So not only are they successful, EDU channels are some of our efficient investments.

- SciShow and CrashCourse have amassed **225k** and **250k** subscribers, respectively, putting them in the Top 10 of all funded channels
- In aggregate, these channels have garnered over **3.5M** hours of watch time (that's 400 years!)
- RPMs trending low due to the EDU brand platforms not yet selling through

Data source:
https://docs.google.com/[redacted]

Blocked requests from schools

42B views / year in US are blocked in schools

Blocked requests / day from Router Providers:

- **OSHEAN:** 10,000-50,000/day
- **Browning Public Schools:** 100-200/day
- **Washington County School District:** 1,000-10,000/day
- **Kokomo schools:** 1000-1500/day
- **Corvallis School District** 100/day
- **Farmington Municipal Schools** 1000+/day
- **Independence Charter School** 500
- **Bulloch County Schools** 50,000

Average: 8300/day per school
Total: 8300 *14,000 school districts = 42B views / year

And this is all from schools that know they are blocked!!!

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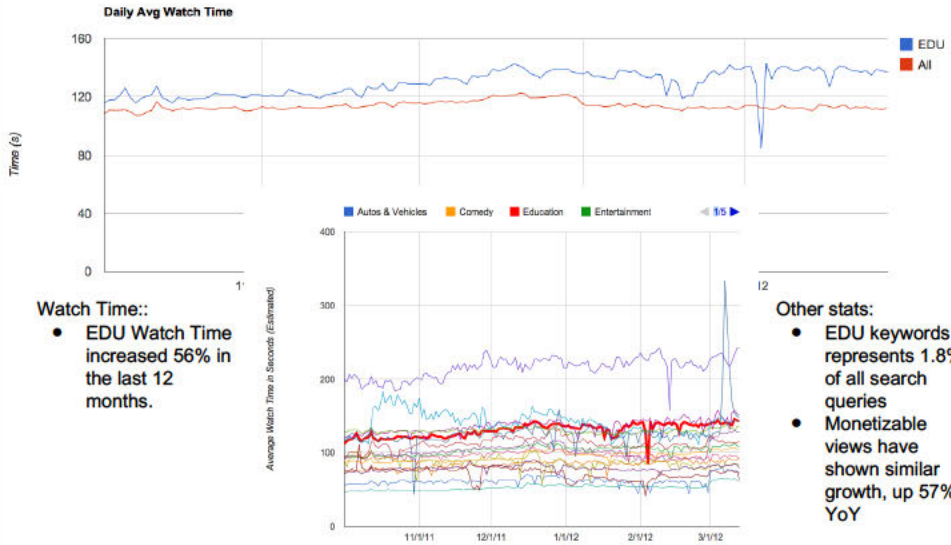
More EDU content = More watch time per user



Watch Time::

- EDU Watch Time increased 56% in the last 12 months.

Other stats:

- EDU keywords represents 1.8% of all search queries
- Monetizable views have shown similar growth, up 57% YoY

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EDU partners win on the Sybil change

film & animation and gadget and games higher than EDU

If it were a P1 Vertical, what would we build?

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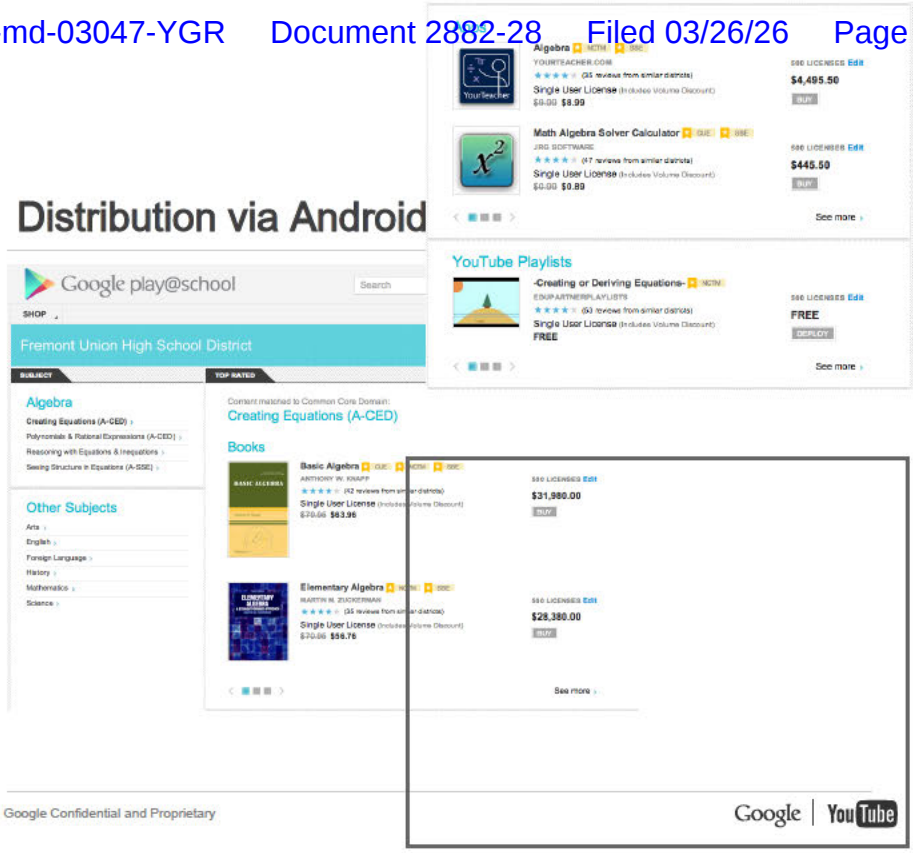
Three areas of focus

	Global Classroom	Content Eligibility and Curation	Distribution & Sustainability
EDU-SPECIFIC	Access in K-12 schools • Domain for embeds (P0) • Domain for site (P1)	Eligibility • Curation + Algo + Whitelist (P1)	Sustainability • EDU Subscriptions for schools (P1) • Sponsorship Marketplace (P2) • Fund Distribution • Android EDU Play (P1) • DoE Learning Registry (P2)
CORE	• In-player interactivity (P1) • Anonymous comments (P1)	• Curation tools (P1) • Navigation / C4 migration (P0)	

Navigation & Taxonomy

Distribution via Android



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Disruption is occurring across the EDU landscape

Pre-K/Primary

- Tablets, 'Passback viewing' from parents to children
- Proliferation of kid-focused destinations and offerings, fueled by smartphone / tablet / app explosion

Secondary

- Flip the classroom
- Adoption of common core standards in US
- Personalization + adaptive learning
- Rising costs, budget cuts

Higher Ed

- Online learning platforms (MOOCs), incl. assessment
- Increased scrutiny of for-profit unis
- Int'l demand for access to top brands

Lifelong Learning

- Infinite electives
- Increased demand for skills-based training to increase employability in challenging economy

These disruptive forces are at work in each of the major learning segments.

1. In Pre-K/Primary, the proliferation of tablets and other mobile devices have given rise to behaviors like passback viewing and various kid-focused offerings
2. In the Secondary world, teachers are experimenting w. popular methods like 'flipping the classroom', whereby they assign videos for homework and use lecture time for discussion instead
3. In Higher Ed, online players are holding massive open online courses (aka MOOCs) to go beyond campus and reach students all over the world
4. In LLL, the web has enabled the notion of infinite electives, where anyone can learn anything

Trends in Edu: K-12

The teacher as a facilitator - not a lecturer

"Flip the classroom"

KHAN ACADEMY

- Students learn curriculum from teacher created videos out of class
- Class time is used for teachers to interact with students, instead of lecturing
- Allows students time to move at own pace
- Shift from "Teacher to student ratio" to "Teacher Time per student", from monologue to dialogue

Bill Gates *"supports use of flipped classrooms and teachers' use of videos for classroom instruction"*

"Bring Your Own Device": Technology in the classroom

- Devices are sweeping the classroom...*but key is for teachers to integrate it with curriculum*
- Wider options for teachers to draw from:
  - Gaming apps
  - Online videos
  - Data and analytics
- Students make more of their own choices in learning
- Fueled by smartphone / tablet / app explosion

"Education is deep in Apple's DNA and iPad may be our most exciting education product yet,"
Phil Schiller, Apple SVP