

AMENDED Exhibit 757

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

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(Exhibitory - Confidential)

YouTube via G Suite

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Q1 2019



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Context, agenda, and goals

Context

- YouTube is distributed an “additional service” within G Suite
- Last December, the G Suite team presented at YTPR to share an overview of the existing product, and also surface some issues and emerging risks; Susan’s guidance was to come back with a plan to address
- Since then, we’ve been granted +3 SWE HC from the Central EDU team [REDACTED] to help de-risk and stabilize our existing products, and uplevel them in the future

Agenda

- Quick overview of YouTube / G Suite relationship and Managed Restricted Mode (MRM) product
- Review key issues with existing products and associated risks
- Discuss recommended near-term solution and timeline

Goals for today:

- Approve absorption of +3 SWE into [TEAM] to begin implementing these solutions

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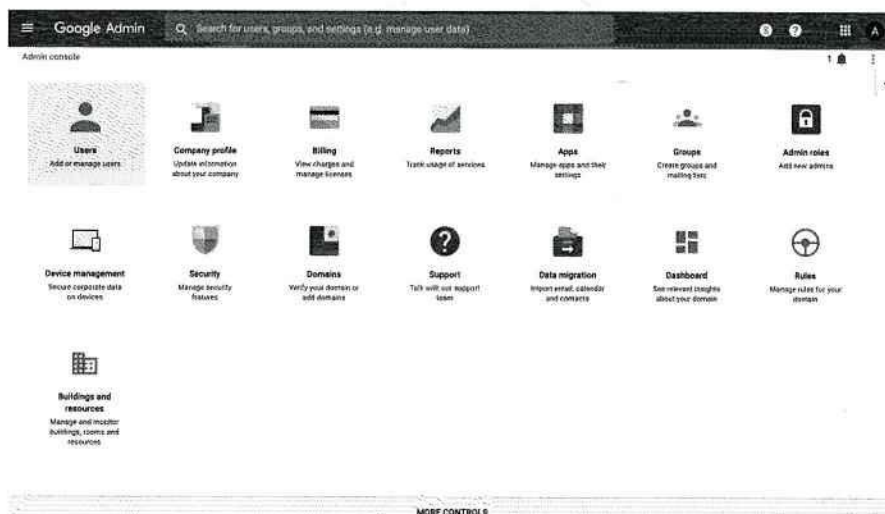
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Managed Restricted Mode (MRM)

Enterprise management tool used by 18M users each month (~33% of total)



MRM is an admin console within G Suite that allows administrators to manage users and permissions in a domain

Admins are able to control YouTube functionality:

- Enable or fully block (*default setting*)
- Content moderation
 - MRM Moderate (Y+G+PG, i.e., YT RM)
 - MRM Strict (Y+G)
 - Whitelist individual videos/channels
- Feature restrictions: comments, chat, and live

MRM has been historically under-resourced (~0.5 PM from G Suite, 20% time from YouTube), which has led to increasingly common user issues and emerging business risks

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Exempt from Discovery

YouTube in Schools

via G-suite for Education



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Context, agenda, and goals

Context

- YouTube is an “additional service” within G Suite for Education
- Managed Restricted Mode (MRM) allows administrators to broadly restrict and individually whitelist viewable content for their organization, and is enabled for 33% of US K12 G Suite users, incl. large districts (e.g., LAUSD)
- At YTPR on 12/12, Susan’s guidance was to ensure YT and G Suite teams are coordinated around product, fix P0 bugs, and address lack of corpus alignment

Agenda

- Revisit our rationale for re-evaluating a solution for schools
- Discuss three examples of current product issues in-market (two driving risk, one missing an opportunity)
- Discuss proposal for de-risking our existing offering
- Discuss proposals to better serve G Suite users

Goals for today:

- Determine how to secure HC to support and maintain MRM (per Susan’s ask at YTPR)
- Align on ‘plan of record’ to better serve EDU users when the time is right

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Video is a critical tool for learning in schools

As a leader in video, YouTube is under increasing pressure to “get it right”

Google → YT working well in schools is critical for Google to succeed in EDU

KOF/Press/Creators → YT’s broader investments in Learning suggest that it should also properly serve EDU users

However, historical underinvestment has led to customer/user issues and legal/reputational risk

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The YouTube experience in K-12 schools is broken

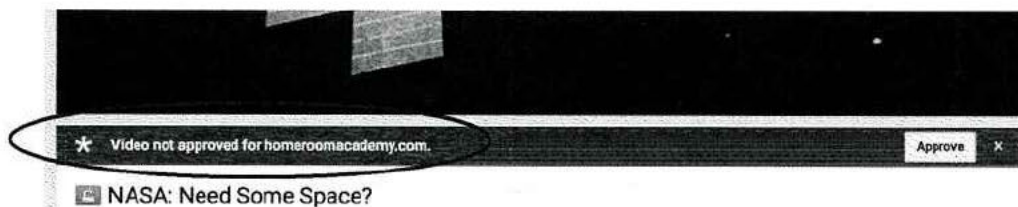
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Example 1: Outstanding bugs lead to escalations and push partners away from YT

Select impacted partners/users:



- Whitelisted videos still appear blocked to administrators (bug)
- Causes anxiety about video availability and whitelist reliability
- In advance of major events (e.g., Hour of Code), CEOs have escalated to Susan / [REDACTED]



To ensure users can access their videos, and as a result of these concerns, partners are building their own video players

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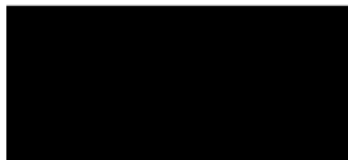
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The YouTube experience in K-12 schools is broken

Example 2: Lack of features controls has resulted in YT being blocked

Select impacted partners/users:



- Students were able to upload publicly-available videos, as MRM doesn't restrict uploads
- YouTube was blocked district-wide as a result



Letter sent to staff/faculty:

"As a district we are charged with ensuring student safety...and such responsibility overrides...our ability to provide open access to technology that does not have appropriate controls built into it."

YouTube remains blocked from [redacted] students (and from ~40% of US K12 students), which damages our brand and reputation in EDU

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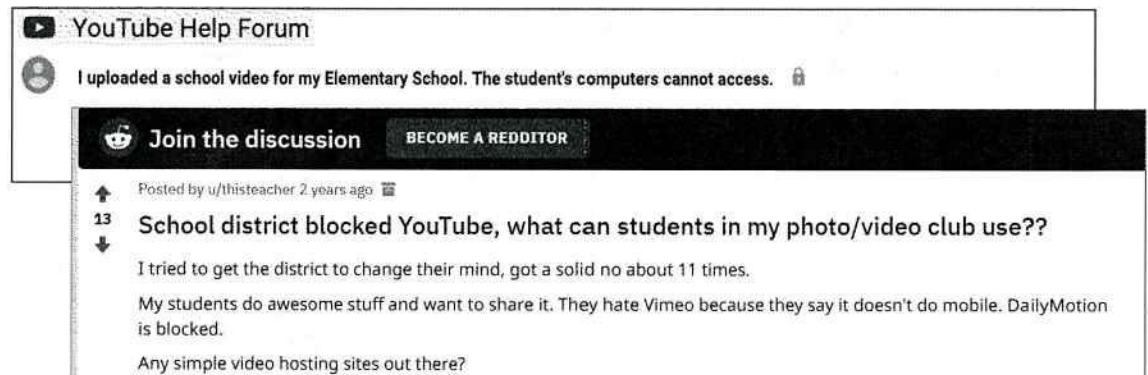
The YouTube experience in K-12 schools is broken

Example 3: Ads and content appropriateness concerns cause YT to be blocked

Select impacted partners/users:



- YouTube via G Suite is ad-supported and brings some content risk
- NYC DoE doesn't consider this an appropriate product for schools



YouTube is blocked from NYC's 1.1M students, precluding them from associating YouTube with 'nutritious' content, and removing a valuable teaching tool from classrooms

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DOCUMENT SLIPSHEET

Bates Number: GOOG-3047MDL-01689011-GOOG-3047MDL-01689109

BEGATTACH: GOOG-3047MDL-01689011

ENDATTACH: GOOG-3047MDL-01689109

Custodian: BESER, JAMES

Author: [REDACTED]

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