

AMENDED Exhibit 785

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



Charter

Age Assurance [HYPERLINK [REDACTED] \h]

The Age Assurance program evaluates and improves methods to estimate or verify a user's age. The Age Assurance program supports Google's ability to distinguish minors from adults and to provide age-appropriate content to our users. This program helps solve the regulatory challenges of age verification our internal partners (1P) face, and provides signals that can fuel

Google's age verification approach developers and partners may rely on for users of our platforms (3P). The goal for this charter is to form a focused, cross-Google program that ensures Google has broadly accepted user experiences for age inference and verification by the end of 2023 to be prepared for new regulations coming into effect in early 2024. This charter provides the scope of the program and aligns stakeholders on goals, non goals, outcomes, metrics, approach and set-up. This is the authoritative document describing the internal governance of this program.

Status: **In Progress**

Authors: [HYPERLINK "mailto:[REDACTED]"]

Contributors: [HYPERLINK [REDACTED] \h]

<add yourself>

Last update: Mar 21, 2023

Commented [1]: Note to reviewers: This document needs input/feedback/alignment from many XFN partners, including those in IdCAT, Unicom, Payments, Android and Chrome. We will get that before attempting to finalize the document.

Approvals and Reviewers

Please note: approvals only apply to the first sections (Chapter [HYPERLINK \ "_192zb16lgnn7" \h] - chapter [HYPERLINK \ "_mxbjcv27jm6n" \h]) - the [HYPERLINK \ "_m20ckpbx5c7e" \h] is outside the scope of this approval and included as information.

Username	Role	Status	Last Change
[HYPERLINK [REDACTED]]	UX lead, IdEco lead	Not started	
[HYPERLINK [REDACTED]]	PM Director, IdEco lead	Not started	



[HYPERLINK [REDACTED] [REDACTED]]			
[HYPERLINK [REDACTED] [REDACTED]]	PM Director, IdEco	Not started	
[HYPERLINK [REDACTED] [REDACTED]]	PM Director, IdEco	Not started	
[HYPERLINK [REDACTED] [REDACTED]]	Eng Director, IdEco lead	Not started	
[HYPERLINK [REDACTED] [REDACTED]]	UTL, IdEco lead	Not started	
[HYPERLINK [REDACTED] [REDACTED]]	GM, Unicorn	Not started	
[HYPERLINK [REDACTED] [REDACTED]]	PM Director, Unicorn	Not started	
[HYPERLINK [REDACTED] [REDACTED]]	Legal Lead, Unicorn	Not started	
[HYPERLINK [REDACTED] [REDACTED]]	PM Director, Payments	Not started	
[HYPERLINK [REDACTED] [REDACTED]]	Eng Director, Payments	Not started	
[HYPERLINK [REDACTED] [REDACTED]]	Eng Director, CAT	Not started	
[HYPERLINK [REDACTED] [REDACTED]]	GPM, CAT	Not started	
		Not started	
		Not started	
		Not started	

Commented [2]: At some point, need to add folks from Chrome/Android.

Commented [3]: I just removed them a week ago since we thought 3P is now tracked in the IDM charter. Do you think it's already time to add them back (i.e. do we have enough agreement already that we want to move Age 3P back here)?

Commented [4]: [REDACTED] guidance was to not slow down the overall charter as we're still figuring out the right strategy/approach/model for 3P, so is it okay if we add them in later?

Commented [5]: I totally think so. Let's get the existing (1P) workstreams into a good shape first indeed...



Table of contents

Commented [6]: Need to make sure this gets updated / remains updated.

[TOC \h \u \z \t "Heading 1,1,Heading 2,2,Heading 3,3,Heading 4,4,Heading 5,5,Heading 6,6,"]

Overview (previous [HYPERLINK

"https://docs.google.com/ [REDACTED]

[REDACTED] \h])

Commented [7]: [REDACTED] - call out that here's a link to the previous doc in case I messed up something!

Problem Statement

Age assurance regulations are live in 32 countries¹ and rapidly expanding to other regions, including California (and likely Utah) in 2024. They require online service providers to move beyond self-declared age to determine with higher confidence whether a user is an adult or a minor. Please click [HYPERLINK "https://docs.google.com/ [REDACTED] \h] for more details.

Commented [8]: Thanks, Vinay! I agree this is useful to have.

Goals and Scope

- Goal 1 - Improving the precision, recall and overall accuracy of the inference model, for both signed-in and signed-out users;
- Goal 2 - Reducing the amount of time the inference model takes to provide an age signal;
- Goal 3 - [REDACTED]
- Goal 4 - [REDACTED]

Non Goals and Out of Scope Topics

List explicitly what is not in the scope of this initiative

- The definition and provision of child safe content is out of scope for this program. It is up to individual product areas to interpret age signals and define their strategy to protect minors. This program focuses on the provision of capabilities that enable age estimation and verification. The outcomes are information services and methods which provide verified signals.
- Child profiles on devices, OS, and apps are also out of scope. This integration happens within programs at Chrome or Unicorn teams.

¹ See background section for details about the regulation status.



- Broader industry approach: the definition of infrastructure, interface and collateral as part of web standards bodies.

-

Program Workstreams and RACI

Workstream Overview

We have broken down the program in 7 workstreams.

Workstream	Objective	Main stakeholders	Teams or people working on it
[HYPERLINK \V "yf8q156fl4ox" \h] [HYPERLINK \V "yf8q156fl4ox" \h] = steering, program strategy and overall program management, including comms and driving exec+ review forums	Define and drive age assurance in an effective and efficient way Ensure visibility into program progress and risks. Drive decisions to resolve open issues and/or remove roadblocks Manage delivery / execution of workstreams	CAT IdEco Payments Unicorn Legal GAPP	Accountable: [HYPERLINK \V "yf8q156fl4ox" \h] Supporting: IdCAT TPM: tbd Payments TPM: [HYPERLINK \V "yf8q156fl4ox" \h] Unicorn TPM: [HYPERLINK \V "yf8q156fl4ox" \h]
[HYPERLINK \V "k3p48h4r3rf g" \h] = Model to estimate user age	Improve accuracy for inferring U18 signed-in users while [HYPERLINK \V "k3p48h4r3rf g" \h] [HYPERLINK \V "k3p48h4r3rf g" \h]	Unicorn IdEco Ads	Accountable: [HYPERLINK \V "k3p48h4r3rf g" \h] Responsible: [HYPERLINK \V "k3p48h4r3rf g" \h]

Commented [9]: [\[HYPERLINK \V "yf8q156fl4ox" \h \]](#) – please review, especially for the column on teams or people working on it.
[\[HYPERLINK \V "yf8q156fl4ox" \h \]](#) - I suggest we add the relevant folks from the specific project / workstream meetings you have, as appropriate. WDYT?

Commented [10]: Yes, I'm thinking about splitting WS2 an WS7 already here, since these have sub-workstreams (partially already defined) and for WS7 [\[HYPERLINK \V "yf8q156fl4ox" \h \]](#) Would that work for you?

Commented [11]: yep (or, at least I think I am!) :-D

Commented [12]: [\[HYPERLINK \V "k3p48h4r3rf g" \h \]](#) I was wondering if we should use the classical RACI definition and name "Supporting" -> "Contributing" (well, strictly RACI speaking, it would be "Consulted", but in our case it seems Contributing works better). We could then use "Informed" for the other L8+ stakeholders of a workstream that are not accountable. WDYT?
 Assigned to [\[HYPERLINK \V "k3p48h4r3rf g" \h \]](#)

Commented [13]: WFM!



	Reduce time to inference from [REDACTED]		Supporting: [HYPERLINK [REDACTED] m-tn](PM IdEco) [HYPERLINK [REDACTED] om-tn](Eng IdEco) [HYPERLINK [REDACTED] tn](Eng IdEco) [HYPERLINK [REDACTED] tn](PM Ads) [HYPERLINK [REDACTED] tn](TL Unicorn) [HYPERLINK [REDACTED] tn](Eng Unicorn) [HYPERLINK [REDACTED] tn](Eng IdAm) [HYPERLINK [REDACTED] tn](IdAm) [HYPERLINK [REDACTED] m-tn](Eng Ads) [HYPERLINK [REDACTED] tn](Eng Ads)
[HYPERLINK \U "ho7caom1h8 a3" \h] = evaluation and integration of alternative age verification approaches	Improve outcomes and inclusivity by ensuring active users have access to [REDACTED] verification methods across regulated markets Increase adult verification success rates	IdEco Payments CAT	Accountable: [HYPERLINK [REDACTED] Responsible: [HYPERLINK [REDACTED]
	[REDACTED]	IdEco Payments	Supporting: PMs: [HYPERLINK [REDACTED] (EntryPoints, Reminders) [HYPERLINK [REDACTED] (Payments) [HYPERLINK [REDACTED]



			om" \h](Payments) UX: [HYPERLINK [redacted] (lead) [HYPERLINK [redacted] (OXD) [HYPERLINK [redacted] (OXD) Eng: [HYPERLINK [redacted]]
	[redacted]	IdEco Payments	Supporting: [redacted] (EntryPoints, Reminders) [HYPERLINK [redacted] (Payments) [HYPERLINK [redacted] (Payments) UX: [HYPERLINK [redacted] (lead) [HYPERLINK [redacted] (OXD) [HYPERLINK [redacted] (OXD) Eng: [HYPERLINK [redacted]]
	[redacted]	IdEco CAT	Supporting: PMs: [HYPERLINK [redacted] (Seite) [HYPERLINK [redacted] (CAT PM) UX: [HYPERLINK [redacted] (lead) [



			HYPERLINK [REDACTED] (UXD) [HYPERLINK] [REDACTED] (UXR) Eng: [HYPERLINK] [REDACTED]
WS3: [REDACTED]	[REDACTED]	Unicorn / Ads	Accountable: [HYPERLINK] [REDACTED] Responsible: [HYPERLINK] [REDACTED]@ [REDACTED] Supporting:
[HYPERLINK] "7uzk7ckw6y3m" \h]	[REDACTED]	Unicorn / IdEco	
WS5: Regulatory Approach	Improve KOF & Regulator understanding of how we protect kids	GAPP / Comms & PR / Marketing	Accountable: [HYPERLINK] [REDACTED] Responsible: TBD [HYPERLINK] [REDACTED] Supporting:
WS6: Infra [REDACTED]	All foundational work needed on the infra side to achieve the Age Assurance program goals.	IdEco	Accountable: [HYPERLINK] [REDACTED] Responsible: [HYPERLINK] [REDACTED] Supporting: PM: [HYPERLINK] [REDACTED] (IdEco) Eng: [HYPERLINK]

Commented [15]: Love all of this. I suspect so. [REDACTED] as well.

[REDACTED] gave us guidance to remove much of the detail from this doc, though I think we should have the ideas you're describing in the supporting, workstream-specific material.

And, I think we should then add you as 'supporting' in this row. Do you agree?

Commented [14]: [REDACTED] We will have a discussion with [REDACTED] about tighter collaboration on [REDACTED]

Could we add them all into this work stream? They are [REDACTED]
Entry points would be part of that work.
Assigned to [REDACTED]

Commented [16]: Just learned that [REDACTED] is leaving Google



			[REDACTED] (IdEco)
	[REDACTED]		Supporting: Eng: [HYPERLINK [REDACTED]
	[REDACTED]		Supporting: Eng: [HYPERLINK [REDACTED] (IdEco) and team

RACI

Roadmaps

[HYPERLINK [REDACTED]
[REDACTED] [HYPERLINK [REDACTED]
[REDACTED]

Dependencies and Constraints

- Delivery of this program is highly dependent on creating a xPA operational model that promotes and drives strategic and operational alignment.
 - To align and collaborate across programs and teams, we are creating the Age Assurance program with new processes and review forums to ensure alignment, resolve questions quickly and remove roadblocks efficiently.
 - To align and collaborate with Payments, we have defined a joint partnership charter - [HYPERLINK
"https://docs.google.com/[REDACTED]
[REDACTED]h]
 - [REDACTED]
 - For the inference model, we have a tiger team in place, consisting of members from Unicorn, Search / YT Ads, and Identity / IdEco. In the course of this program, we'll determine how the setup of this effort might evolve further. Right now, significant



improvement for the inference model is dependent on [REDACTED]

- Regulatory changes:
 - California bill passed and is effective July 2024 => inference model and other verification methods need to be ready / GA by then, and other states are likely to have other laws in place in 2024.
 - Utah and Florida are about to pass new legislation that places new requirements for age assurance, including removing the ability to rely on existing methods such as the [REDACTED]
 - [REDACTED]

Assumptions and Risks

Assumptions

- Sufficient resources will be identified by each PA to meet the timeline (in accordance with the RACI)
- Our age assurance techniques will be updated as new regulations are published

Risks

TBD

Success Criteria

- Deliver age assurance solutions that ensure Google remains compliant with new and upcoming age-related regulations;
- Optimize verification flow, and options within flow, for user convenience and successful verification;
- Ensure users have [REDACTED] age verification methods in every regulated market that is deemed easy to use, have high success rates, and are deemed inclusive for all users;
- There is an approved plan (with resources identified) to improve the inference model for [REDACTED]

- [REDACTED]
- [REDACTED]



• [REDACTED]

Execution Guideline (CARVE OUT INTO DEDICATED DOC)

Detailed Program Structure and Organization

Workstreams and responsibilities

Communication Plan

Type of Comms	Cadence	Purpose	Attendees
Bi-Weekly Newsletter	2x month	bi-Weekly progress and status updates to appropriate stakeholders	TBD
Bi-Weekly Leads Meeting	2x month	Meet with Leads on progress and status Discuss risks, issues, decisions,... raised by the Working Groups	[REDACTED] [REDACTED] (from unicorn), [REDACTED] [REDACTED] (from payments), [REDACTED] When there is a agenda item on 3p ([REDACTED], Android and Chrome (names TBD), Ads ([REDACTED] and other names TBD), [REDACTED] [REDACTED]
VP Forum Review Meeting	1x/month	Executive summary providing updates to Project Sponsors and Executive Team on progress of project, brings open issues and questions, get steers as new issues come up	[REDACTED] (from Payments), [REDACTED] [REDACTED] (from CAT), [REDACTED] [REDACTED] for now, and will eventually add Chrome and Android)

Commented [17]: Let's keep these in this doc, but let's remove some of the material. I'm not sure all of the info is necessary per workstream. What's most important, IMO, is: what is the workstream. Why it exists. What its attempting to do. Who's on point for what.

WDYT?

Commented [18]: TBD if we need this section here with details or the structural view at the beginning of the doc is sufficient.

Commented [19]: [REDACTED]

I think we're going to need some diagrams / structure here to show our program, and the different review processes / comms we're going to create. WDYT?



GV Review Meeting	As requested	Bringing big product strategy questions or challenges	TBD
WS1 WG for Inference Model	2x month	Track progress on deliverables, highlight risks, and provide update on action items	TBD
WS2 WG for Verification Methods - [REDACTED]	1x week	Track progress on deliverables, highlight risks, and provide update on action items	TBD
WS2 WG for Verification Methods - [REDACTED]	1x week	Track progress on deliverables, highlight risks, and provide update on action items	TBD
WS3 WG for [REDACTED]	1x week	Track progress on deliverables, highlight risks, and provide update on action items	TBD
WS4 WG for [REDACTED]	1x week	Track progress on deliverables, highlight risks, and provide update on action items	TBD
WS5 WG for Regulatory Approach	1x week	Track progress on deliverables, highlight risks, and provide update on action items	TBD
WS6 WG for Ecosystem Strategy	1x week	Track progress on deliverables, highlight risks, and provide update on action items	TBD
WS7 WG for Infra [REDACTED]	1x week	Track progress on deliverables, highlight risks, and provide update on action items	TBD

Commented [20]: [REDACTED] For this one, we already have two meetings. One overall xPA sync (the one we had for the first time yesterday, Wed), and one IdEco level implementation sync (Thursdays). Please note that further down in the document I've already listed all existing meetings in more detail (<https://docs.google.com>) [REDACTED]

Commented [21]: I don't think we should capture all meetings here. We should only capture the xPA ones. This plan is to document only key meetings that will give you overview of the progress of the program.

Let me know if you disagree and we can update it.

Commented [22]: Fine for me in general. There was just a request in the past to have one place where all AA related meetings can be seen in summary. Maybe we can find a way to mention additional meetings without adding all the details in the charter?

Commented [23]: I think this one may be okay at every other week, but it may be worth checking with [REDACTED] and team.

Commented [24]: Will do.

Commented [25]: Thanks!

Commented [26]: May not need one for this WS

Commented [27]: Agreed. Maybe once every couple of weeks?

Commented [28]: I am also thinking that this should be done within each workstream. Let's talk about this tomorrow.

Commented [29]: Makes sense!

Resolution Procedures



Path	Definition	Path to resolution
Risks	Highlights a possible source of delay in the delivery of a milestone	Submitted through to PgM alias and discussed during bi-weekly leads status meeting if offline closure is unsuccessful
Action items	Covers an assigned task that must have a clear owner and due date	
Issues	Describes a concern that may not yield in any specific project delay	
Dependencies	Explains which activities must be completed (including who must complete them) in order for progress to be made on a given milestone	
Decisions	Establishes an agreed-upon program conclusion 2x month	
Change requests	Articulates a need to alter an agreed-upon program deliverable (expectation differs from original design) and must be assessed for program-wide impact	Submitted through meeting agenda and discussed during bi-weekly leads status meetings. Requires executive leadership approval.

