

AMENDED Exhibit 799

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

Time Watched Profile Launch - Digital Wellbeing Comms Doc

Launch/SMT Date:

Monday, August 27, 2018
6AM PST

Location: All YT countries

External materials:

- [HYPERLINK
"https://docs.google.com/[REDACTED]
[REDACTED] \h]
- B roll

Internal links

Overview (internal)

At I/O (May 2018) we announced a series of updates to the YouTube mobile app that can help users develop their own sense of digital wellbeing. This suite of tools included:

Time watched profile (launching Monday, August 27): To give you a better understanding of the time you spend on YouTube, we're building a time watched profile that you'll soon find in your Account menu. This usage profile includes your daily average watch time and how long you've watched YouTube videos today, yesterday and over the past 7 days, along with a full suite of tools for users who want to manage their watching habits.

Take a break reminder: This feature lets you set a reminder to (you guessed it!) take a break while watching videos. Just set the reminder to appear every 15, 30, 60, 90 or 180 minutes, and your video will pause at that interval until you dismiss it or resume playing the video. This feature is "off" by default and can be enabled/disabled and adjusted in your Settings. See these instructions.

Scheduled notification digest: This feature allows you to combine all of the daily push notifications you receive from the YouTube app into a single combined notification. Just set a specific time to receive your scheduled digest and from then on you'll only receive one notification per day. The scheduled digest is "off" by default and can be turned off/on in Settings with these steps.

Disable notification sounds and vibrations: This feature ensures that notifications from the YouTube app are sent silently to your phone during a specified time period each day. By default, all sounds and vibrations will be disabled between 10pm and 8am, but you can enable/disable the feature and customize the start and end times from your Settings.

On Monday, August 27, in coordination with the roll out of the Time Watched Profile, we'll post to the YouTube blog, reminding people of the tools available.

PR Plan

Objectives:

- Drive awareness, usage of wellbeing tool
- Showcase that we take our responsibility seriously and are balancing growth with responsibility

Strategy:

- Focus on consumer press who may not have heard about this/covered this at I/O
- Tips and tricks narrative to make this more actionable for consumers

PR Plan:

- **Blog post** with the news will go up on the main blog at 6AM PST on Monday, August 27
- **SMT** to hit TV and radio stations with the news day of launch
- **Blast** consumer-focused outlets like parenting blogs

Internal Comms [HYPERLINK

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

[REDACTED] \h]:

- Preview announcement in YTStaff weekly email the week of August 14
- Post Moma card that links to blog post shortly after it goes live on Monday, August 27
- Include one-liner and blog post link in The Daily Insider

Key Messages / SMT Script (brief and consumer friendly)

- **Background/Definition of Problem**
 - We spend a ton of time connected to our devices — surfing, scrolling, gaming and watching videos.
 - The average person spends several hours a day on their smart phone alone, adding up to 86 hours a month ([HYPERLINK "https://www.textrequest.com/blog/how-much-time-people-spend-mobile-phones-2017/" \h])
 - Stats like that have given way to rising concerns over the addictiveness of tech and how much time we're spending looking at screens. Some studies even tie extended screen time to distractions, sleep deprivation and depression.
 - YouTube is one of the [HYPERLINK "http://www.pewinternet.org/2018/03/01/social-media-use-in-2018/" \h] out there with 73% of Americans visiting the site or app daily, which is why I've spent time looking into tools that anyone can start using to manage their digital wellbeing.
 - The good news is, YouTube was one of the first tech companies to think through this and added a few new tools to help us out.
- **Time Watched Profile:**
 - You may think that you're only watching a few YouTube videos here and there, but those minutes can add up.
 - In order to fully understand how much time you're spending watching videos, YouTube is releasing a Time Watched Profile today. It'll tell you how long you've watched YouTube videos today, yesterday and over the past 7 days.
 - Have a look at those numbers, consider how you feel about them, and consider setting a goal.
- **Remember to take a break:**
 - If you see that you're watching too much, we can help you cut back.
 - It's easy to lose track of time in YouTube, watching one video after another. But you can actually set up a reminder to take a break

- Just head over to your settings and pick the amount of YouTube time you think is right. Once you've hit that limit a friendly reminder will pop up on your screen.
- **Disable notification sounds and vibrations:**
 - Notifications can be distracting and overwhelming, especially close to bedtime
 - Now YouTube sends notifications silently during nighttime hours. That means no buzzing, no ringing.
 - By default, all sounds and vibrations have been disabled between 10pm and 8am, but you can choose what you want those quiet hours to be in the app.
- **Combine notifications:**
 - If you prefer not to have notifications, you can turn them off or combine them
 - I subswwhy cribe to a lot of YouTube channels, and don't want to miss new videos, but prefer to get one daily digest sent to my phone.
 - Best part is, you can pick the time of day that it gets sent to you
 - I like to set this for after work, when I have a bit more free time
- **Wrap up:**
 - It's just like any other healthy habit. Once you begin to set boundaries and stick to them, they can become healthy habits that you can apply elsewhere and with other apps or tech.
 - To access any of these tools, head over to your Settings in the YouTube app
 - You can learn more at [[HYPERLINK "https://wellbeing.google/" \h](https://wellbeing.google/)]

FAQ

Why are you highlighting digital wellbeing?

- Google's products have historically been viewed positively as they help people get things done. We have long been building products with a focus on productivity, such as Search, Gmail, Photos, and Maps. With Google Home and the Assistant we have been working to create an even more natural and screen-free relationship with technology.
- We recognize that not every experience our users have with tech is helpful. Users are concerned about the quantity of time they spend with tech and the quality of their experience with some apps and content. Google's goal is to serve our users with useful tools and give them more control over their relationship with their devices. And we've always built our products for productivity, knowing that once we've delivered that usefulness, we need to disappear and get out of the way users can focus on what matters most.

Aren't you worried that people are addicted to your products?

It is easy to get stuck in a cycle of obligation to our social network or waste time on apps that distract us from our lives. We've always built our products for productivity, knowing that once we've delivered that usefulness, we need to disappear and get out of the way users can focus on what matters most. Google's core products aim to provide an inherent usefulness, to help users get the information they need quickly so they can more fully connect to life offline.

How about YT?

YouTube usage is very different from social media. People come to the platform a few times of day to see the content they enjoy, much like turning on the television. When disconnecting is hard, the simplest thing to do is to turn off auto-play, which is already available and present directly above the watch next panel. YouTube is also announcing a suite of new features at IO -- such as the time watched profile to help users become more aware of their time spent on the platform, a notifications digest to bunch notifications for delivery once a day, and a take a break reminder which allows users to set a time-interval when they'd like to be prompted to pause watching content.

What about kids?

We believe the bar must be set even higher when the audience is kids. Kids today are growing up with technology, vs. growing into technology the way most adults have. We take our responsibility very seriously when designing controls for parents to guide their kids developing relationship with tech. We consult with child psychologists and other experts on best practices for products like YT Kids and Family Link, and we're investing in digital literacy programs (e.g., [[HYPERLINK](#)

<https://beinternetawesome.withgoogle.com/en> \h]). Some specific examples of these controls are:

- **Family Link:** an app that lets parents set ground rules for kids usage (schedule time limits, review installed apps, etc.)
- **YouTube Kids:** parents can decide whether search is on or off, set timers.
- **Google Play:** extra set of policies for apps for which kids are primary audience, special "designed for families" designation that apps must apply for

Isn't your business model built on creating addictive products?

Usefulness is our guiding principle. Search Maps Gmail Photos. Easy and widespread access to technology (smartphones in particular) has provided tremendous benefits—democratized access to information and services for billions of people around the world. In many markets, smartphones are the 'first screen', serving as an entire family's sole connection to the digital world and all it offers.

Don't your ads fund addictive games and services?

Ads fund a variety of developers and creators who make a living from building products that entertain, delight and educate. Sometimes these products are hard to disconnect from, but ads themselves are not the driving force behind habit creation. While there is still a lot of research to be done to determine why some people have a harder time than others in disconnecting from technology, we hope that the new features we are introducing here will help people by giving them the tools to understand how they use technology as well as help them disconnect.

What about hardware like Android that support a universe of apps that are not just Google products?

We've thought about what we could build right into Android to help people achieve balance. We believe balance starts with awareness of your current behavior and empowerment supported by tools that help you control how you spend your time online.

What is your response to "[[HYPERLINK](#)

<https://www.theguardian.com/technology/2018/feb/05/tech-addiction-former-facebook-google-employees-campaign> \h]," the brainchild of the Center for Humane Technology and funded by Common Sense Media, which is a group of former Facebook and Google employees dedicated to "reversing the digital attention crisis and realigning technology with humanity's best interests"?

We are always looking for ways that we can do more and we are dedicated to better understand the problem space and the specific concerns and impact of exposure to different types of technology and

online engagement. It is critical to our company's mission and our product focus. We look forward to thoughtfully engaging with a group of experts/thought leaders—including Tristan Harris and the Center for Humane Technology and various others to shape solutions that foster healthy use of technology and enable users to benefit from the amazing amount of information online without interfering with their wellbeing.

How does Google's responsibility compare to Facebook? Isn't YouTube as much of a time waster as Facebook?

Google and YouTube are truly committed to putting the user first. It is core to our mission. We have a responsibility to better understand how the usage of technology affects our users and we are committed to helping users understand and manage their time on our products and services.

Aren't you doing this to prevent future regulations of your platform?

We are doing this because it is the right thing to do. Our core products have always been about being helpful to users/ These launches are the latest iteration of that mission--to help users better understand and manage the usage of their digital devices.

Why aren't you focusing on Data Privacy and Security instead?

We've long had a very robust and strong privacy program at Google: whenever we build anything we start by asking how we can secure people's data and give them the tools to manage it. Our work on privacy and security is evolutionary, not revolutionary. We continuously update our tools and transparency practices in response to the changing global privacy landscape. Security is also a key driving principle for us, because true privacy can only be possible with strong security. We're committed to meeting GDPR requirements when the law takes effect on May 25th and also in the long term.

What teams are working on this Digital Wellbeing initiative?

There are user experience teams throughout Google which are constantly working to improve our products based on user feedback and a deep understanding of how users interact with technology. They UX designers are focused on improving our relationship with tech, respecting our user's time, attention and overall well being, and developing tools that will empower users to control how they use technology.

Are you doing any research on the topic?

We have many groups at Google working to better understand how users interact with technology. Many of the products we are launching to improve digital wellbeing are a result of that work.

Q: Why is YouTube offering this feature?

A: This update helps you understand how much time you spend on YouTube. We want you to be in control here, so this feature is off by default and you can choose how long of a time span you want to watch before the reminder pops up. Here's more info: [HYPERLINK]

Q: How does it work?

A: You'll see a new "remind me to take a break" setting with options for a reminder to appear every 15, 30, 60, 90 or 180 minutes. The reminder will pause your video until you dismiss it or choose to resume playing the video: [[HYPERLINK](#)]

Q: Can this be enabled/disabled? How?

A: Yes, this can be turned on/off and customized in your Settings. Check out these step-by-step instructions: [[HYPERLINK](#)]

Q: What reminder frequency or options can I choose?

A: You can choose to have the reminder pop up every 15, 30, 60, 90 or 180 minutes, or you can choose to disable the feature entirely: [[HYPERLINK \[REDACTED\]](#)]

YouTube is forcing people to take a break from watching videos!

A: The setting is off by default and you can choose how long of a time span you want to watch before the reminder pops up. This update just helps you understand and control how much time you spend on YouTube, here's more detailed info: [[HYPERLINK \[REDACTED\]](#)]

Q: Are you doing this in reaction to criticisms that YouTube only cares about increasing watchtime? How much watchtime are you willing to sacrifice?

Every single person uses YouTube differently. Whether you consider yourself a power user or just like watching videos from time to time, we want to help everyone better understand their tech usage, disconnect when needed, and create healthy habits. That's why today we're launching a series of updates to the YouTube mobile app that can begin to help everyone develop their own sense of digital wellbeing.

Notifications: scheduled digest

Q: What is the scheduled notification digest?

The scheduled digest combines all daily push notifications you'd receive throughout the day and sends you just one daily digest notification instead. You can set a specific time to receive your digest. Here's more on how it works and how to set it up: [[HYPERLINK \[REDACTED\]](#)]

Q: Why is YouTube offering this feature?

A: People have told us they want more control over when they receive YouTube notifications. This feature provides that flexibility, letting you choose how and when you receive notifications. It's an opt in feature that can be changed or turned off in the settings.

Q: What about Live stream notifications? / Does this include live stream notifications?

A: The scheduled digest combines all push notifications including live streams, upload and comment notifications. By enabling this feature, you may not receive your digest until after a live stream has ended.

Q: Does this override the 'Bell' setting?

A: The digest respects bell settings, so you'll still receive all push notifications that you'd normally get that day, just in one combined notification digest. Note: the default bell setting is "occasional", you can change this to "all notifications" if you'd like.

Q: Can this be enabled/disabled? How?

A: Yes, this feature is off by default and you can toggle it on/off in settings. You can also adjust the time you receive the digest from your settings, here are the instructions: [[HYPERLINK \[REDACTED\]](#)]

Q: Can you get more than one digest per day?

A: Not at this time, but feel free to drop a feedback request here: [[HYPERLINK \[REDACTED\]](#)]. We use that tool to track and prioritize requests!

Q: Does the digest send all notifications? Does the digest use an algorithm to determine what to send?

A: The digest respects bell settings, so you'll receive all push notifications that you'd normally get that day, just in one combined notification digest. The default bell setting is "occasional" and you can change this to "all notifications" if you'd like: [[HYPERLINK \[REDACTED\]](#)]

Q: Does the digest only apply to the mobile app? How does this impact email or desktop notifications?

A: The digest is only for the YouTube mobile app. It doesn't change your email or desktop notification settings!

Q: [Creator] This is not a good idea! My subs already aren't being notified, and now they're going to miss more of my notifications!

A: This feature is off by default and completely optional—it's meant to provide additional flexibility for how and when people receive YouTube notifications. And your users will still receive all push notifications that they'd normally get that day, just in one combined digest.

Notifications: disable sounds & vibrations

Q: What is this feature and how is it different from scheduling a single batch of notifications?

A: This feature ensures that notifications from the YouTube app are sent silently to your phone during a specified time period each day. By default, all sounds and vibrations will be disabled between 10pm and 8am, but you can enable/disable the feature and customize the start and end times in Settings.

Q: OK so what does a silent notification look like?

A: All push notifications still send and remain on the lock screen as they do today. The only change is that notifications will send silently during specified hours, meaning they won't generate noise or cause the phone to vibrate. You can toggle this on/off in Settings!

Q: Why is YouTube offering this feature?

A: Research shows that engaging with devices in the hour before bed can interfere with sleep, so we're silencing notifications at night. You will still receive all of your push notifications, which will remain on the lock screen as they do today.

Q: Wait, is this an opt in feature? That's not even my bed time.

A: All of the features announced today are opt in and can be managed via settings. This includes the hours when you'd like notifications to be silenced.

Q: What about Live stream notifications?

A: During the specified time window, all notifications will still be sent to your device, but without sound.

Q: [Creator] How much will this impact my WT? / This is going to negatively impact my WT

A: We've found that for most people, receiving notifications with sound during nighttime hours is more disruptive than helpful. While testing this feature, we found that overall watch time remained the same and more people chose to keep their notifications turned on.

Q: [Creator] How will this impact viewers receiving notifications about my videos?

A: All notifications will still send to viewers! We've tested this feature and found that overall, less people opted out of notifications and unsubscribed, showing that a decrease in night time disruption has a positive impact on the notification experience and makes it more likely that viewers will receive your notifications in the future.

Q: What impact will this have on my channel?

A: The results will differ for each creator, but we ran a test with this feature for several weeks, and saw very limited to no reduction in watch time driven through notifications.

Q: What notifications send sounds and vibrations today? How is this any different from what's available already?

A: Many YouTube notifications are already sent silently (at all times), including upload notifications. With this new feature, live stream notifications and a few other less common notifications will be sent silently from 10PM-8AM by default.

Q: Why is 10pm set as the default start time? Why is YouTube telling me when I need to go to bed?!

A: Current research from the National Sleep Foundation recommends shutting off screens about an hour before bed to improve sleep hygiene. The average bedtime is around 10:45pm, so 10:00pm was chosen to fit most sleep schedules. Of course, you can always adjust these hours in your settings.

Q: I'm a night owl, don't set my default for me this is way too early!

You can always adjust the start time and end time in Settings. Here are detailed instructions: [HYPERLINK [REDACTED]]

Time watched profile

Q: What is YouTube's new Time watched profile?

A: The time watched profile lets you see your daily average watch time and how long you've watched YouTube videos today, yesterday and over the past 7 days. The statistics are based on your YouTube watch history. [HYPERLINK [REDACTED]]

Q: Why is YouTube offering this feature?

A: We are launching this to give users more information about the amount of time they spend on YouTube and provide easy access to settings and controls to help them change their behavior if desired.

Q: When will this launch?

A: The time watched profile will be available in the coming months. Beyond that, we don't have any specifics to share at this time.

Q: Where can I find my time watched profile?

A: (before it launches): You won't see it just yet, it's coming soon! We don't have an exact date to share just yet, but plan to provide this feature in the coming months.

A: (once the time watched profile launches) You can find your time watched profile in the account menu. Details her: <link to hc article>

Q: What happens when I pause my watch history?

A: If you pause your watch history, time watched statistics will not populate: [HYPERLINK [REDACTED]]