

AMENDED Exhibit 844

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

Project Yaaas: Youth Awareness of Appearance Alteration in Shorts [1-Pager]

Commented [1]:

[HYPERLINK

"https://docs.google.com/

h]

Background

Shorts are an especially popular format with youth. In SupeX, Shorts views account for 65% of views. In Shorts creation, camera [HYPERLINK

"https://docs.google.com/

h], [HYPERLINK

"https://docs.google.com/

h], and retouch can be used to alter the physical

appearance of those in the video. Today, these appearance alterations are not transparent to the teen viewer and that may adversely impact their self-esteem and self-image, when teens are unaware and developmentally susceptible to negative social comparison of physical appearance. In addition, compared to similar platforms, Instagram Reels and TikTok, they have already shown filters and effects transparently on their watch page.

- Filters (and [HYPERLINK

- Retouch

- Effects: Ex. Classic Glow (shown below), [HYPERLINK

"https://docs.google.com/

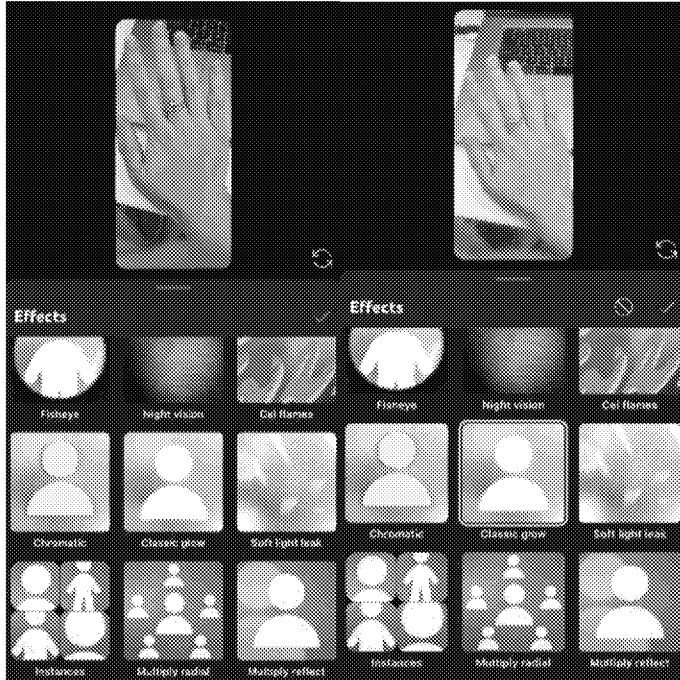
h] - not launched yet

Commented [2]: How big is the corpus for Shorts vs. VODs? Is it a similar magnitude - billions?

Commented [3]: TODO: Sync up with Camera Product team on what effects and filters and retouch are available for creation on live, VOD.

@ can reach out to

Commented [4]: @ Eng contacts for camera and ACE (advanced capabilities effects):



Research

Teens and experts recognize the impact of video filters to their wellbeing and mental health.

- Expert researchers have found beauty filters and negative social comparison may be correlated with negative wellbeing, especially in youth:
 - In 2018, researchers discovered 55% of surgeons are now seen by patients looking to improve their appearance for selfies (up from 42% in 2015) and that the pervasive nature of filtered images regularly trigger body dysmorphia. [[HYPERLINK](https://www.forbes.com/sites/lealondon/2020/03/23/in-self-isolation-filter-dysmorphia-and-beauty-filters-will-threaten-our-mental-health/?sh=442e5cb3831c) "https://www.forbes.com/sites/lealondon/2020/03/23/in-self-isolation-filter-dysmorphia-and-beauty-filters-will-threaten-our-mental-health/?sh=442e5cb3831c" \h]
 - "Usage of specific features such as touch-up feature...and amount of time spent looking at oneself were associated with appearance comparisons. Additionally, adjusting lighting and camera angles and amount of time spent looking at oneself are associated with self-objectification" [[HYPERLINK](https://www.researchgate.net/publication/360394032_Looking_beyond_zoom_fatigue_The_relationship_between_video_chatting_and_appearance_satisfaction_in_men_and_women) "https://www.researchgate.net/publication/360394032_Looking_beyond_zoom_fatigue_The_relationship_between_video_chatting_and_appearance_satisfaction_in_men_and_women" \h]

- In a teen social listening study, video filters were [HYPERLINK ██████████] by teens and drive a high amount of social conversation from teens.
- Anecdotally, users of beauty filters and effects recognize the impact on teens and want platforms to be responsible and transparent about their usage.
[HYPERLINK "https://www.instagram.com/p/CJ1qFlphSkZ/?hl=en" \h]

Scope of Project (First Phase)

Shorts-first:

- Shorts are the most popular format for young viewers; thus, we focus on shorts watch only for the first phase. If live and VOD camera creation also have effects and filters, we may consider filter transparency for that in the future.

Shorts-Camera Effects & Filters only:

- We focus on effects & filters used from Shorts Camera creation only because we won't be able to know the appearance alterations used before the video was uploaded to YT.

Appearance Alterations:

- [In order of priority] Effects, filters, and retouch

Industry Precedent

Instagram Reels shows the effects on the watch page above the creator name and also next to the audio used under the caption of the reel. Tiktok also shows the effect on the watch page. On both platforms, the watch page does not show any CTA next to the effect. However, tapping the effect leads the user to a page with more videos that use the effect and a button on the bottom of the page with CTA to create the effect.

Instagram Reels

Commented [5]: ██████████ do you know if camera effects & filters available for non-shorts creation?

Commented [6]: not yet. I think Stories had effects a while ago.

Commented [7]: yes, there are filters & effects available in Stories today. those existed prior to Shorts

Commented [8]: To be more robust, what % of shorts have filters/ effects vs what % of non-shorts have filters/ effects

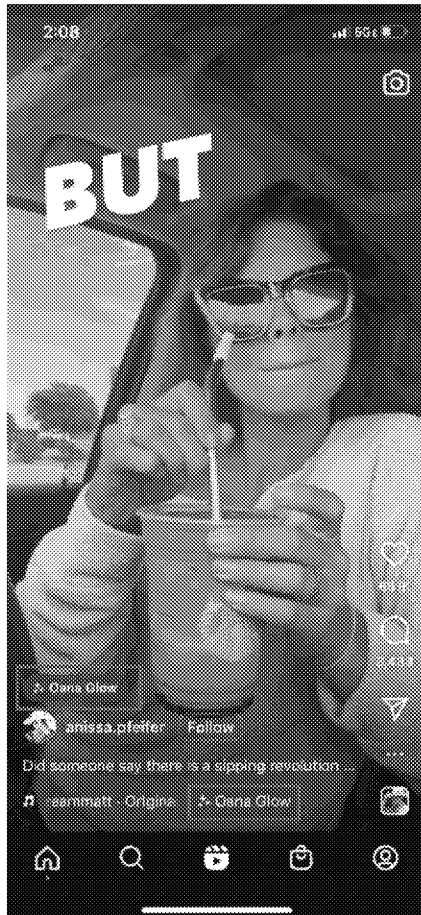
Commented [9]: ██████████

Commented [10]: this is more an Effects / Creation growth tactic vs. transparency or responsibility on part of TT & IG. Those platforms are trying to encourage more developers to Effects, and creators to use them discoverable on watch pages.

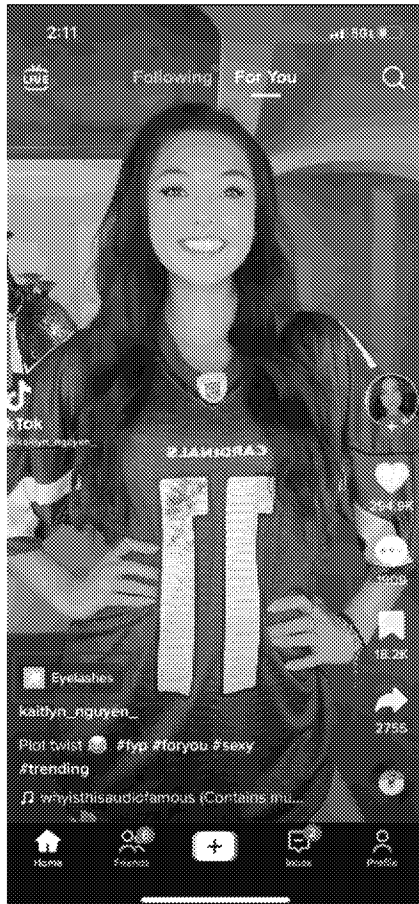
Commented [11]: there's definitely that aspect to it for general effects, but in the case of appearance filters and effects, it also acts as a full disclosure so viewers are aware and not misled

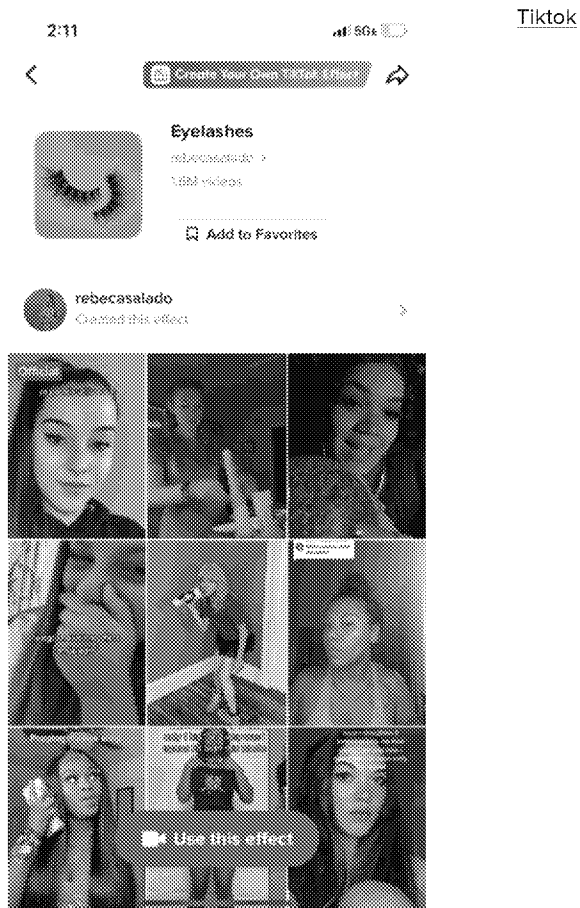
Commented [12]: yeah - agreed.

I wonder if / what naming restrictions are there for 3p effects? For example - can a skin whitening effect just call itself something else. Then viewers won't know what the effect really does.









Problem

Today, appearance alterations—filters, effects, retouch—used in the short form video are not transparent to viewers. From a responsibility perspective,

- This may be detrimental to teen viewer wellbeing
- YT Shorts may be considered not up to industry standard with similar platforms

Commented [13]: key difference is allowing 3rd party effects.

Goal

Primary:

- Match industry & viewer expectations for well-being of young viewers on appearance filter transparency

Secondary:

- Lead in responsibility for young viewers' wellbeing

Non-goal:

- Encourage engagement & creation with effects & filters (appearance or non-appearance related)

Commented [14]:

for discussion today, would like feedback on whether this is clear and anything else we should consider?

Surfaces

- [HYPERLINK
"https://docs.google.com/ [REDACTED]
[REDACTED] \h]: This is the Shorts [HYPERLINK
"https://docs.google.com/ [REDACTED]
[REDACTED] \h] for [HYPERLINK
"https://docs.google.com/ [REDACTED]
[REDACTED] \h] because it fits with the creation ingredients used in the video. However, structured description today is hidden behind the (1) 3 dots on the Shorts Watch page, and (2) the menu. However, Shorts team has plans to increase visibility of Structured Description to be 1-tap away from the Shorts Watch with a new entry point from the video title.
- [HYPERLINK
"https://docs.google.com/ [REDACTED]
[REDACTED] \h]: This surface is the most similar to industry standard—where other platforms have placed the effects transparency. However, Shorts team has dedicated [HYPERLINK
"https://docs.google.com/ [REDACTED]
[REDACTED] \h] for suggested actions and effects/ filter transparency may not match those.
- [HYPERLINK
"https://docs.google.com/ [REDACTED]
[REDACTED] \h]: This surface is feasible, but does not make sense today because it does not match user expectations.
- [HYPERLINK
"https://docs.google.com/ [REDACTED]
[REDACTED] \h]: This surface is feasible, but does not make sense today because it does not match user expectations.

	Structured Description	Suggested Action	Top Bar	Paused State
User Expectation	Unsure (TBD)	Effects (TBC)	None (TBC)	None (TBC)

Commented [15]: [REDACTED] Once you've done some exploration, can you fill out this section?

Industry Precedent	- N/A for Reels and TikTok - IG Posts caption show "Made with X" Effects - IG Posts caption show hashtags of Filters	- TikTok and IG Reels for Effects - Not sure for Filters and Retouch	None	None
Visibility	Low	High	High	Medium
Eng Feasible				
Eng Effort				

Commented [16]: @ [REDACTED] Once you've done some exploration, can you fill out this section?

Commented [17]: [REDACTED] Once you've done some exploration, can you fill out this section?

Open Question

- Are filters available on non-Shorts as well as Shorts?
 - If so, should this information be displayed on those videos too?
- Are we aiming to highlight effects that are added outside of YT tools?
 - Perhaps, but likely not phase 1.

Projected Timeline [Stretch]

- 9/26 - 9/30: Scope project and 1-pager
- 10/3 - 10/7: Align on goals with Youth leads
- 10/10 - 10/XX: UX exploration and early mock-ups
- 10/10 - 10/14: Align on goals with Shorts leads
- 10/17 - 10/XX: Complete PRD and UX mocks
- 10/XX - 11/XX: Eng exploration
- 10/31 - 11/04: Check-in/ Update with Youth Leads
- 11/04 - 11/11: Check-in/ Update with Shorts Leads
- 11/XX - 11/XX: Eng design

Commented [18]: @ [REDACTED] for discussion today, what else do we need to know to start estimating

Appendix