

AMENDED Exhibit 932

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

From: [REDACTED]
Sent: 9/22/2022 11:58:29 AM
To: [REDACTED]
CC: Katharina Ostergaard [REDACTED]; [REDACTED] Adi Jain
[REDACTED]; [REDACTED]; [REDACTED]
Subject: Re: Check in on Athena-Classifer

[REDACTED] FYI

Hi Katharina,

Regarding question 3: I am adding in [REDACTED] to see if he can give us updated recovery rate numbers for Athena actions.

I'm not sure I understand the full context of the thread - in case you are referring to the number of successful [REDACTED] users, I believe that the overall numbers we pulled end of June 2022 should still hold, i.e.

- [REDACTED] during the "grace period" (the period in which they are not yet forced to verify their age), and
- another roughly [REDACTED].

In terms of conversion to supervised accounts (through Alaska), this is

- around [REDACTED] of Athena users during grace period,
- while we don't have a breakdown of Athena vs. self-declared minors when going through Alaska, the overall number is roughly [REDACTED] conversion rate

Hope this helps,
[REDACTED]

On Wed, Sep 21, 2022 at 3:36 PM [REDACTED] > wrote:

[REDACTED] FYI considering the eventual unification of Athena with TOOM.

[REDACTED] considering that is largely a question about auto-actioning and his working group leads this currently.

On Wed, Sep 21, 2022 at 9:08 PM Katharina Ostergaard <[REDACTED]> wrote:

Thanks so much, [REDACTED]!

Regarding Question 1: A follow-up question: Is there a reason for that we [REDACTED] [REDACTED]? And is there a way to check how many of the estimated [REDACTED] accounts already have been through verification?

Could you ask with the google analyst teams to check for this? As YT teams we don't really know about that account verification status.

Also we don't have a good reason to exclude channels that already are verified, in principle excluding those would make sense. The most ideal case for such an exclusion would be on the TPS side, so that it covers

[REDACTED]. You might want to talk to [@Adi Jain](#) for some help there with TPS.

Regarding question 3: I am adding in [REDACTED] to see if he can give us updated recovery rate numbers for Athena actions.

Regarding Question 4: When you say we are currently operating at [REDACTED] - does this mean we are reviewing everything above [REDACTED]?

To clarify (also on [REDACTED] reply just now), we review [REDACTED] at [REDACTED], humans do not review every account that we have knowledge of with at least [REDACTED] (not sure if that was what you went for here).

Follow up question: do you have insights on the action rate for human review, based on precision percentage? For example: Accounts at [REDACTED] have a X amount of action rate compared to accounts [REDACTED] etc

Thanks so much for helping out here. Very much appreciate your help.

Best,
Katharina

• Katharina Østergaard
• Legal Specialist - EMEA
• YouTube Legal Ops Team
[REDACTED]



On Tue, Sep 20, 2022 at 8:24 PM [REDACTED] wrote:
Adding [REDACTED] and [REDACTED]

Hi Katharina,
Let me share some numbers based on the data we currently have.

1. How many more accounts are we estimating at @ 95%.

Our pipeline looks at [REDACTED]. Based on the [REDACTED] sample, it seems like there are [REDACTED].

IIUC we consider all [REDACTED] accounts that are still active, are not a dasher or a unicorn account, and have never been enqueued for a human review while scoring. So if an account was auto-action, and was later verified to be OK during the appeals process, we can still auto-action the account again!

Konstantin, can you confirm my calculation above?

Possible reasons for so many underage accounts to still exist on the platform could be, as I said above, that [REDACTED].

Another possibility is that more and more children have created new accounts which were not accounted for in the [REDACTED] number that we estimated over a year ago.

2. How many more @ 90%, 85%, 80% etc?

Given that we are so off in the [REDACTED] precision range, I don't feel comfortable estimating how many are in other ranges.

3. Are we able to calculate the recovery rate for each of these percentages? or is there a way I do this myself?

We do not have the knowledge of the recovery rate for the accounts that we auto-action. This is something that is handled by yt_flows through a complicated process. We also do not have access to that data.

4. At what precision rate are we currently enqueueing for human review?

We are consistently operating at [REDACTED] precision rate for human reviews.

In order to have better estimates, we need to get access to the appeals verdict so that we can exclude such accounts from [REDACTED] again. Please let me know if you help us here? [REDACTED]

Regards,

On Tue, Sep 20, 2022 at 3:48 PM Katharina Østergaard [REDACTED] > wrote:

Hi [REDACTED].

Hope you are doing well.

As discussed before over ping, I wanted to check in with you again around the Athena Classifier. We are looking to do a deep-dive into the numbers in order to understand a little better what our strategy going forward should be. We are for example looking into if we can lower precision rate for automation.

Would you be able to provide some insights here? Here are some of the points Im looking into as a starter;

1. How many more accounts are we estimating at @ 95%.
2. How many more @ 90%, 85%, 80% etc?
3. Are we able to calculate the recovery rate for each of these percentages? or is there a way I do this myself?
4. At what precision rate are we currently enqueueing for human review?

If there is someone else I can ask here, please let me know! Also happy to jump on a call if thats easier.

Best,
Kat

• Katharina Østergaard
• Legal Specialist - EMEA
• YouTube Legal Ops Team
[REDACTED]



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[REDACTED] | Software Engineer, YouTube | [REDACTED] | [REDACTED]

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[REDACTED] | Technical Program Manager | [REDACTED]