AMENDED Exhibit 741

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

Produced in Native

EXHIBIT
GOOGLE / YOUTUBE
KURTZ 30(b)(6)
3/25/25

Business Case for Kids and Families at Google

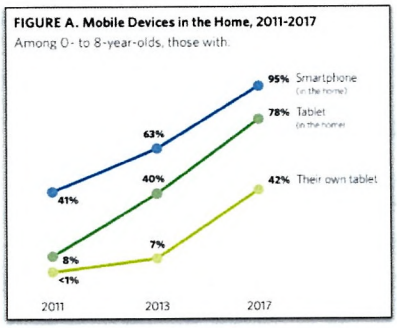
November 2020

PM: [redacted]

"...historically the Internet has been designed to be used by adults, over 40 per cent of new users going online are kids. He described this transition as being as significant as the shift from desktop to mobile." - SuperAwesome

Solving Kids is a Massive Opportunity

- Kids under 13 are the fastest-growing Internet audience in the world
  - **40% of new internet users** going online are **kids**
  - **170k kids** around the world **go online for the first time every day**
- Kids are using devices at younger ages and getting devices of their own at younger ages
- Parents invest heavily in getting devices for their kids and top purchase drivers[1] are: 1) Familiarity of an OS; 2) Current ecosystem; 3) Past experiences when choosing an OS
- Marketers understand the importance of this fast growing market
  - Digital Marketing aimed at kids is **growing 25% YoY**
- Within Google, we have the Family Group construct and Supervised Users
  - Google Family Groups eclipsed [redacted]
  - Supervised Users have a [redacted]
- And our own data shows,
  - Family and Kid Users have **higher engagement** and are **more likely to be buyers**
  - Families lead to **better retention** and **more overall value**



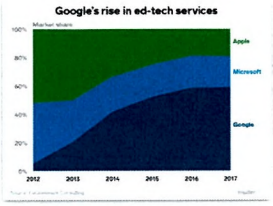
[1]Android users consider price, openness/choice and anti-Apple sentiment when choosing/switching an OS.
iOS users consider brand identity, quality of device, good customer service and starting with iOS when choosing/switching an OS.

1) if parents are already familiar with a certain OS, they are more likely to buy a device with the same OS for their kid,
2) parents choose devices that are compatible with their families existing ecosystem,
3) parents give their kids hand-me-down devices (more common with iOS)

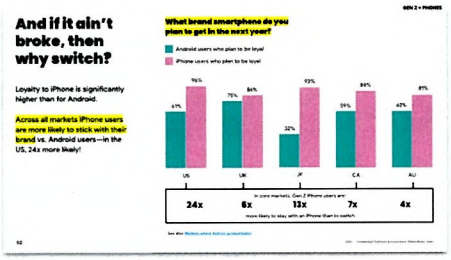
Ecosystem

Onboarding kids into Google's Ecosystem leads to brand trust and loyalty over their lifetime

- Investing in schools helps onboard kids into Google's ecosystem
- School laptop brand influences future purchase patterns
- If you get someone on your operating system early, then you get that loyalty early, and potentially for life
- Brand Trust -> Loyalty - 80% of consumers will continue to buy brand they trust; 76% will advocate on behalf of the brand[1]
- It cuts both ways though - iPhones are tremendously **sticky - "iPhone users are 24x more likely to stick with their brand than Android"**



	Chromebook	Windows	MacBook
Consideration for buying a Chromebook	47%	31%	18%
Consideration for buying a Windows	57%	70%	30%
Consideration for buying a MacBook	29%	32%	66%



Google Classroom

chromebook

"If you get someone on your operating system early, then you get that **loyalty early, and potentially for life**," said Mike Fisher, an education technology analyst at Futuresource Consulting, a research company.

Sources:

[redacted]

[1]Brand Trust Case Study

Slide 1

3 same title note

more broadly, I'm wondering if there is other ecosystem data we can pull in here? Even use case study of Apple?

So essentially making the case that it's not just schools, but it's also a compelling "cool" product that keeps a kid/teen for life.
[redacted]s; 1/9/2021 6:05:30 PM

Goals

- Build out a business case for investing in kids at Google
  - Example: Case Study: Netflix launches Kid Profile -> leads to 2-5X increase in Retention if user creates kids profile
- Gather internal and external evidence of why families and kids are important to software products
  - Retention/Churn Rate
  - Increase Revenue/Profit
  - Etc.

Findings

- Family sharing/subscription plans perform better than individual plans
  - Retention of plans increases (churn decreases) with family group adoption and adding additional members [Play Pass case study, YouTube TV case study, Google Fi case study, YouTube Music and Premium case study, Spotify case study]
  - Free-to-paid conversion increases with more members sharing; even greater when shared with >=1 Unicorn [Play Pass case study]
  - Family sharing is a sought after feature [Stadia case study, Spotify case study]
  - Leads to net gross adds of the subscription [Spotify case study]
- Streaming Services
  - Households with kids more likely to subscribe to over-the-top (OTT) video services and to have more services than households without kids [Streaming Services case study]
  - "Children are relatively churn-proof" [Streaming Services case study]
  - Kids are huge driver for any streaming service [Netflix case study]
    - 60% of netflix's member watch kids' programming (50M unique Netflix profiles streamed kids' titles)
- Family Accounts are more likely to be buyers [Play case study, Streaming Services Case Study]
- Family Accounts are more engaged than average users [Play case study, Play Family Library case study]
- "To solve for the home, we need to solve for the Families with Kids" [Assistant case study]
- Families are stickier [Assistant case study]
- Ecosystem Play
  - School laptop brand has influence on future purchase patterns [Chromebook case study]
  - Investing in schools helps onboard kids into Google's ecosystem (long-term play) [Big Tech - Schools case study]
- Children under 13 are the fastest-growing Internet audience in the world (170k kids around the world go online for the first time every day) [SuperAwesome Case Study]
  - 40% of new users going online are kids
- Digital marketing aimed at kids is growing at about 25 percent per year [SuperAwesome Case Study]
- Google has won K-12 education technology market in US; however, teenagers still prefer to buy iPhones and MacBooks [Google Android Chromebooks Case Study]
  - Note: even without Google hardware, kids are still using Google services
- If you get someone on your operating system early, then you get that loyalty early, and potentially for life [Google Took Over Classroom Case Study]
- Brand Trust -> Loyalty - 80% of consumers will continue to buy brand they trust; 76% will advocate on behalf of the brand [Brand Trust Case Study]

This is an attempt at categorizing the findings from the last slide

Findings (categorized)

- Short-term: Current $/Retention
  - Paid User Churn/Retention is significantly better with family plans and kids
  - Family Accounts are more likely to be buyers
  - Family Accounts are more engaged than regular users
- Medium-term: Users
  - Children under 13 are the fastest-growing Internet audience in the world
    - Kids are a large % (40%) of new users coming online
  - Digital marketing aimed at kids is growing at about 25 percent per year
  - Kids are key to solving the Home experience (Nest/Assistant)
- Long-term: Ecosystem Play
  - School laptop brand influences future purchase patterns
  - If you get someone on your operating system early, then you get that loyalty early, and potentially for life
  - Brand Trust -> Loyalty - 80% of consumers will continue to buy brand they trust; 76% will advocate on behalf of the brand [Brand Trust Case Study]
  - Investing in schools helps onboard kids into Google's ecosystem

Slide 1

1	Include how quickly unicorn is growing and family group is growing to show these are huge growth opportunities for Google. [redacted]; 12/18/2020 11:19:18 AM

Laptop brand in school has an influence on purchase patterns

Using a Windows or MacBook at school predicts a consumer preference for those brands upon graduation; this does not happen with Chromebooks.

	Child was provided a **Chromebook:**	Child was provided a **Windows:**	Child was provided a **MacBook:**
Consideration for buying a **Chromebook:**	47%	31%	18%
Consideration for buying a **Windows:**	57%	70%	30%
Consideration for buying a **MacBook:**	29%	32%	66%

Source: Kids and Families Knowledge Audit
https://docs.google.com/presentation/d/1_e8fkl7LCtnh2Atjgs3aWrL__I7JiFpwOSt_u2hTctk/edit?usp=sharing

Chromebook Brand Tracker - Parent Deep Dive, July 2018

Data from May 2018. Q39 “How many children live in your household?” Base: All respondents n=3000. Margin of error: ±1%
Q38 “What ages are the children in your household?” Base Respondents with children n=1062. Margin of error: ±2%

Google is filling high school classrooms with Androids and Chromebooks — but the kids just want iPhones

"**Google** has won the **K-12 education technology market**."

"Part of their motivation to move into that market is to get kids acclimated to Google products, like the Chromebook."

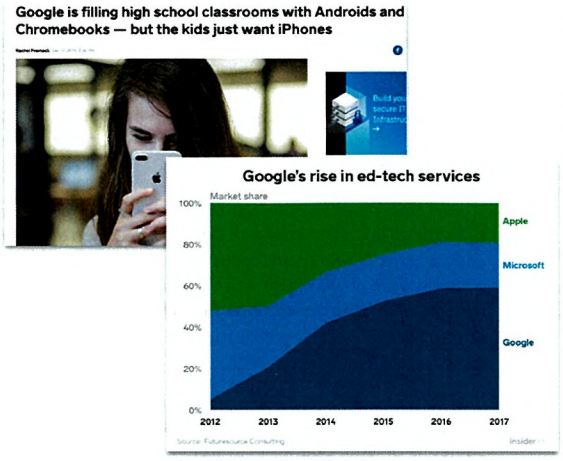
"However, **teenagers prefer to buy iPhones and MacBooks** when they graduate high school."

"There are **80 million educators and students globally using G Suite for Education**, which allows users to access Gmail, Google Cloud, Google Docs, and other productivity tools. In 2017, Chromebooks and other **Google devices** made up **58% of all devices purchased for US classrooms**, according to Futuresource data."

"Analysts say Google's interest in schooling stems from a desire to **get children and teenagers accustomed to the Google ecosystem**."

"It's pretty clear what motive Google has," Gartner Research vice president Kelly Calhoun Williams, who focuses on K-12 education and was in public education for 25 years, told Business Insider. "This is not a product they're selling; this is not a commercial product. **It's getting lots of people very used to working in a Google environment**."

""I would argue that that shows Google's strategy for education has worked quite well **even if you're not using (Google hardware) anymore**," Greengart said. "**There are long-term benefits for Google there.**"



Source: https://www.businessinsider.com/google-classroom-dominating-schools-kids-want-apple-products-iphone-2018-12

How Google Took Over the Classroom

"In the space of just five years, Google has helped upend the sales methods companies use to place their products in classrooms. It has enlisted teachers and administrators to promote Google's products to other schools. It has directly reached out to educators to test its products — effectively bypassing senior district officials. And it has outmaneuvered Apple and Microsoft with a powerful combination of low-cost laptops, called Chromebooks, and free classroom apps."

"Today, **more than half the nation's primary- and secondary-school students — more than 30 million children — use Google education apps** like Gmail and Docs, the company said. And Chromebooks, Google-powered laptops that initially struggled to find a purpose, are now a powerhouse in America's schools. Today they account for **more than half the mobile devices shipped to schools.**"

Google, a unit of the $652 billion Alphabet, is the latest big contender in a decades-old battle among tech companies to **hook students as future customers. "If you get someone on your operating system early, then you get that loyalty early, and potentially for life,"** said Mike Fisher, an education technology analyst at Futuresource Consulting, a research company.

Source:
https://www.nytimes.com/2017/05/13/technology/google-education-chromebooks-schools.html