

## **AMENDED Exhibit 757**

### **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

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Exhibit 35 Confidential

# YouTube via G Suite

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Q1 2019



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GOOG-3047MDL-01689011



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# Managed Restricted Mode (MRM)

Enterprise management tool used by [REDACTED] users each month [REDACTED]



MRM is an admin console within G Suite that allows administrators to manage users and permissions in a domain

Admins are able to control YouTube functionality:

- Enable or fully block (*default setting*)
- Content moderation
  - MRM Moderate (Y+G+PG, i.e., YT RM)
  - MRM Strict (Y+G)
  - Whitelist individual videos/channels
- Feature restrictions: comments, chat, and live

MRM has been historically under-resourced [REDACTED] which has led to increasingly common user issues and emerging business risks

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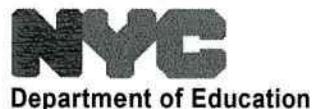
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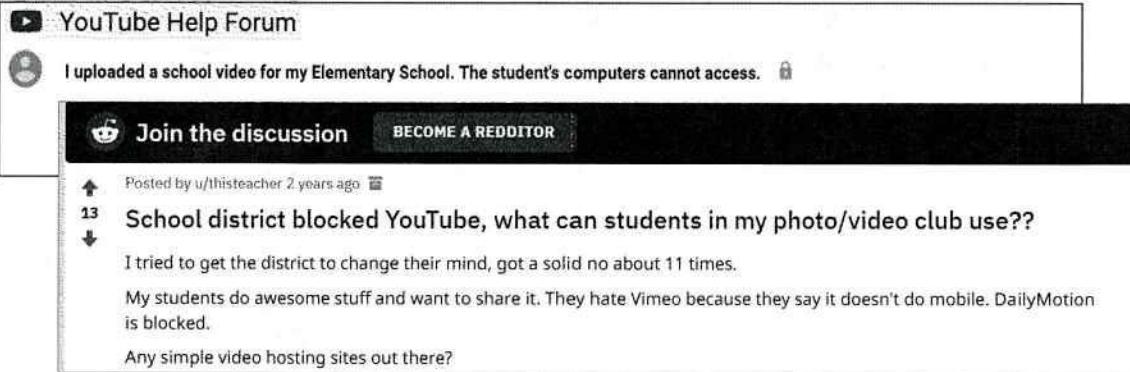
# The YouTube experience in K-12 schools is broken

## Example 3: Ads and content appropriateness concerns cause YT to be blocked

Select impacted partners/users:



- YouTube via G Suite is ads-supported and brings some content risk
- NYC DoE doesn't consider this an appropriate product for schools



A screenshot of a Reddit post on the 'YouTube Help Forum' subreddit. The post, by user 'u/thisteacher', asks: 'I uploaded a school video for my Elementary School. The student's computers cannot access.' It has 13 upvotes and 1 downvote. The post text continues: 'School district blocked YouTube, what can students in my photo/video club use??' The user replies: 'I tried to get the district to change their mind, got a solid no about 11 times. My students do awesome stuff and want to share it. They hate Vimeo because they say it doesn't do mobile. DailyMotion is blocked.' The user also asks: 'Any simple video hosting sites out there?'

YouTube is blocked from NYC's 1.1M students, precluding them from associating YouTube with 'nutritious' content, and removing a valuable teaching tool from classrooms

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GOOG-3047MDL-01689082

## DOCUMENT SLIPSHEET

**Bates Number:** GOOG-3047MDL-01689011-GOOG-3047MDL-01689109

**BEGATTACH:** GOOG-3047MDL-01689011

**ENDATTACH:** GOOG-3047MDL-01689109

**Custodian:** BESER, JAMES

**Author:** [REDACTED]

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**MAAG BEGBATES:**

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