

## **AMENDED Exhibit 758**

### **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





# G Suite for Education

YouTube Product Review - 12.12.18

*ATTORNEY CLIENT PRIVILEGED*

Google Cloud

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## YouTube isn't safe, often blocked in schools



### YouTube isn't safe for students, so it's blocked in schools

No way to block unsafe content, comments, ads. █ of US K12 schools block YouTube

*"I don't like my students going to YouTube and seeing all the comments and ads and related videos."  
"The parents in my very rural school district are upset with student access to YouTube."*



### Efforts to make YouTube safe for schools have yet to work

Restricted Mode doesn't work like it's supposed to, YouTube for Schools deprecated in 2015

*"YouTube's Restricted Mode has blocked a poem I wrote for a gay friend" "Is YouTube anti-LGBT?"  
"With YouTube for Schools going away, I've had to block YouTube access entirely for my students."*



### YouTube has rich EDU content, but isn't designed for formal learning

Poor discoverability. No options for student interaction, sequencing for progressive learning

*"Watching a video on YouTube is no more active or engaging than reading a textbook. And what happens when a high school student is assigned videos from all six of her classes?"*

Source: GfE call reports & product forums

Google

From marketing analysis  
YouTube is not safe for schools















