

## **AMENDED Exhibit 1012**

# **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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1 VIDEOGRAPHER: Good morning.  
2 We are now on the record. My name is  
3 Darnell Brown. I'm the videographer  
4 with Golkow.

5 Today's date is April 24, 2015  
6 {sic}, and the time is now 9:05 a.m.

7 This video deposition is being  
8 held in Palo Alto, California, in the  
9 matter of Social Media Adolescent  
10 Addiction, for United States District  
11 Court, for the Northern District of  
12 California.

13 The deponent is Neal Mohan.

14 Counsel will be noted on the  
15 stenographic record.

16 The court reporter is Carrie  
17 Campbell, CSR number 13921, and will  
18 now swear in the witness.

19  
20 NEAL MOHAN,  
21 of lawful age, having been first duly sworn  
22 to tell the truth, the whole truth and  
23 nothing but the truth, deposes and says on  
24 behalf of the Plaintiffs, as follows:  
25

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1 DIRECT EXAMINATION

2 QUESTIONS BY MS. CONROY:

3 Q. Good morning, Mr. Mohan.

4 A. Good morning.

5 Q. I introduced myself earlier.

6 My name is Jayne Conroy, and I represent the  
7 plaintiffs in this case.

8 We also have some folks that  
9 are on the Zoom screen, and their names are  
10 going to be on the record so you'll know  
11 who's here.

12 And we also have a few  
13 exhibits, just so that there's warning to  
14 everyone, that have a competitor protective  
15 order status. And so when those are coming  
16 up, we will take a break or stop the  
17 deposition and do something so that we can  
18 put others who do not represent YouTube or  
19 are not involved directly with YouTube to go  
20 into a breakout room.

21 Okay?

22 Nothing you need to worry  
23 about, just to let that -- so that people  
24 don't get nervous online.

25 A. Thank you.

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1 Q. Have you ever been deposed  
2 before?

3 A. I have, yes.

4 Q. Okay. On how many occasions?

5 A. I would say about two or three  
6 occasions, yes.

7 Q. Okay. And were they in-person  
8 depositions?

9 A. They were -- they were like  
10 this. I think one maybe might have been on  
11 video, but they were -- they were generally  
12 like this, this type of a room.

13 Q. Okay. So you sort -- you know  
14 the ground rules pretty much?

15 A. I do. I think -- I mean,  
16 unless there's anything else specific you'd  
17 want to share.

18 Q. No, Ms. Campbell is going to  
19 keep track --

20 A. Okay.

21 Q. -- of us when we talk over each  
22 other, so that's the worst thing we can do.

23 A. Okay.

24 Q. Have you ever testified before  
25 Congress before?













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1 on LinkedIn.

2 A. Sure. Oh, it's right here.

3 Q. Yes. You're free to look at it  
4 either on the screen or hardcopy, whatever is  
5 easiest for you.

6 A. Okay.

7 Q. And we'll mark this as  
8 Exhibit 1.

9 And this goes through -- did  
10 you develop -- did you create this profile?

11 A. I did, yes.

12 Q. Okay. And if we go back to the  
13 beginning, it starts with your education and  
14 then Accenture, DoubleClick, and then you  
15 begin at Google in March of 2008.

16 Do you see that?

17 A. I do see that, yes.

18 Q. Okay. SVP, is that vice  
19 president of sales?

20 A. No, that's senior vice  
21 president. That was my -- what I was  
22 ultimately promoted up into during my time at  
23 Google.

24 Q. Okay. And could you describe  
25 for me what display and video ads, what that

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1 encompassed or what your responsibilities as  
2 senior vice president for display and video  
3 ads --

4 A. Sure.

5 Q. -- was all about?

6 A. So display and video ads are  
7 basically the image ads and video ads that  
8 you would see on, really, websites across the  
9 internet. And so, you know, on the -- on the  
10 page of The New York Times or Wall Street  
11 Journal or what have you, those were called  
12 display ads.

13 And video ads, of course, are  
14 the, you know, kind of video, instream ads  
15 that would run on websites like YouTube or  
16 CNN or kind of where they have video.

17 And my job was product  
18 management for those, so building the  
19 products that our advertiser and publisher  
20 clients would use to run their businesses.  
21 And so I did that for a number of years. And  
22 that's basically what display and video ads  
23 are.

24 Q. Okay. And for approximately  
25 how long were you senior vice president at

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1 Google?

2 A. I was -- oh, let's see. When  
3 was I -- this is a long time ago now.

4 So I was promoted to senior  
5 vice president maybe -- I think maybe 2014,  
6 maybe 2015, something like that, and by then  
7 I moved over to YouTube shortly -- shortly  
8 after that.

9 And I'm technically -- I'll  
10 continue to be a senior vice president at  
11 Google.

12 Q. I see.

13 So even though you're CEO of  
14 YouTube, you're also a senior vice president  
15 at --

16 A. Yeah --

17 Q. -- Google?

18 A. -- YouTube is kind of like a --

19 MR. PETROSINELLI: Let her  
20 finish the question before you answer.

21 THE WITNESS: Yeah. Sorry.

22 Yes.

23 QUESTIONS BY MS. CONROY:

24 Q. There, we just did it. See?

25 But it wasn't -- it wasn't Ms. Campbell

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1 that --

2 A. I apologize for that.

3 MR. PETROSINELLI: That was her  
4 fault. Don't worry about it.

5 THE WITNESS: I'm sorry. I'm  
6 sorry. Your question was?

7 QUESTIONS BY MS. CONROY:

8 Q. So let me ask you. So even  
9 though you are a CEO of YouTube, you are --  
10 also remain senior vice president at Google?

11 A. Correct.

12 Q. Okay. And has your e-mail  
13 remained the same the entire time you've been  
14 at Google?

15 A. Yes.

16 Q. And that's -- what is your  
17 e-mail?

18 A. My e-mail is [REDACTED].

19 Q. Are there any YouTube e-mails?

20 A. I do have a YouTube e-mail  
21 address. I guess technically it's  
22 [REDACTED]. They all go to the same  
23 place.

24 Q. Okay. Can you describe for me  
25 your move -- I'm going to call it a move.

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1 I'm not sure what it really was -- from  
2 Google to YouTube?

3 A. So I moved over from Google to  
4 YouTube towards the end of 2015, and I moved  
5 in the capacity as chief product officer. So  
6 my responsibility at YouTube was really  
7 building our products for our -- for our  
8 viewers, our consumers, also for our  
9 creators, the content creators, that upload  
10 their video content to YouTube.

11 And so that's -- those are the  
12 areas that I looked after. Trust and safety  
13 was a part of that as well.

14 Q. Had you had any  
15 responsibilities with respect to YouTube  
16 before your move in 2015?

17 A. Yeah. So I didn't have formal  
18 responsibilities over the products as I  
19 described, but in my capacity leading our  
20 display and video ads business, I was  
21 responsible for the advertising that was on  
22 YouTube.

23 So I did work with YouTube in  
24 the capacity of building advertiser products  
25 that, you know, resulted in the ads that ran



















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1 VIDEOGRAPHER: Yep, looks good.

2 I closed the rooms.

3 (YouTube-Mohan Exhibit 7 marked  
4 for identification.)

5 QUESTIONS BY MS. CONROY:

6 Q. Okay. We'll mark as the next  
7 exhibit, 7, a document with the  
8 Bates 04703742 through 46.

9 You're free to look at this.  
10 I'm only going to be asking you about -- a  
11 little bit about the first page.

12 A. Okay.

13 Q. This is a document that says,  
14 "Global age inference model 2023, YouTube  
15 only." And the author is [REDACTED]  
[REDACTED], and it's dated October 21, 2022.

17 A. Yes, and I will have to read it  
18 here because it's also in tiny font.

19 Q. Do you know [REDACTED] [REDACTED]?

20 A. I do, yes. She's a product  
21 manager.

22 Q. Okay. And is she at YouTube?

23 A. I believe she is still at  
24 YouTube.

25 Q. And if you just take a look at

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1 the very top, Background, it says, "Youth is  
2 a key YouTube initiative in 2023, and  
3 responsibly growing the youth segment is a  
4 top priority for YouTube across multiple  
5 product strategies."

6 Do you see that on the screen?

7 A. I do see that, yes.

8 Q. Okay. And then I'm going to be  
9 looking at number 1, which says, "Youth North  
10 Star."

11 Okay?

12 A. Okay.

13 Q. It says, "Declared age has a  
14 low recall but high precision for under 18."

15 Do you see that?

16 A. "Declared age" -- okay. Yes.

17 Q. And helpfully, it goes on to  
18 explain exactly what that means.

19 "Meaning those who say they are  
20 under 18 are likely to be under 18, but only  
21 a small fraction of those who are actually  
22 under 18 are declaring accurately."

23 Do you see that?

24 A. I do see that, yes.

25 Q. "To set a higher bar for

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1 safety, we'd like to expand our protections,  
2 globally, to users that could be minors,  
3 independent of their declared age."

4 Do you see that?

5 A. Uh-huh, yes.

6 Q. And is that -- so that's  
7 something that [REDACTED] was working on as a  
8 product manager at YouTube?

9 MR. PETROSINELLI: Object to  
10 the form.

11 THE WITNESS: I don't remember  
12 exactly what [REDACTED] was working on. She  
13 may have been working on this effort  
14 in conjunction with many other people.  
15 I'm trying to remember what team she  
16 was actually on.

17 I don't think she was the  
18 person solely responsible for that,  
19 but she might have been one of the  
20 people who was involved. I think she  
21 was on our -- maybe on our identity  
22 teams but not on the youth team.

23 So I don't remember exactly  
24 what she was working on.  
25













































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1 have to get built, trained on ground truth  
2 and usage patterns for each country, language  
3 pair.

4 So -- but I do believe that  
5 that -- that dispersion is available in  
6 the -- in the UK.

7 Q. And so under 18 users, whether  
8 they have declared themselves to be under 18  
9 or not, in the UK would receive -- the  
10 classifier would work for them.

11 Correct?

12 MR. PETROSINELLI: Object to  
13 the form.

14 THE WITNESS: Again, I can't  
15 remember exactly when we rolled that  
16 out. In my -- so I'm not sure how  
17 many years subsequent to this  
18 announcement we rolled it out in the  
19 UK.

20 But I believe -- in fact, I  
21 think we did it relatively recently,  
22 if I'm not mistaken. So it might be a  
23 brand new thing.

24 QUESTIONS BY MS. CONROY:

25 Q. So in the UK, you are using the

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1       inferred age for the application of the --  
2       I'm going to call it the classifier or the  
3       repeat video issue?

4               MR. PETROSINELLI:   Object to  
5       the form.

6               THE WITNESS:   Yes, I just -- I  
7       can't -- I unfortunately can't tell  
8       you exactly when. I believe it was  
9       relatively recent, but -- and again,  
10      for those same reasons that I was  
11      mentioning, which is, we want to get  
12      these classifiers to a -- to a level  
13      that we feel comfortable that we can  
14      layer on top of our recommendations.

15              Now, of course, just because it  
16      wasn't available in the UK at the same  
17      time it was available in the US  
18      doesn't mean that we didn't have other  
19      safeguards in place in all of these  
20      other places. It was of course built  
21      on top of our existing recommendation  
22      architecture, all of the safety  
23      standards that we have in  
24      recommendations.

25              You know, the recommendations

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1 feature is ultimately they're  
2 recommending content. And all of the  
3 content on YouTube, of course, is  
4 subject to all of our community  
5 guidelines and how they work in terms  
6 of what's allowed, what's not allowed.

7 And so all of that, all of  
8 those safeguards, apply globally. And  
9 so that was whether you're a UK user,  
10 a US user.

11 Now, this concept of sort of  
12 dispersing repeated content is  
13 something that we started in the US,  
14 but we want to fast-follow now that we  
15 feel like we have a -- you know, a  
16 product. And our child development  
17 experts speak very highly of this  
18 capability, and so I'd like to roll it  
19 out globally as quickly as possible.  
20 It's a feature that we're very proud  
21 of.

22 QUESTIONS BY MS. CONROY:

23 Q. But it's still not available to  
24 under 18 users who are declared as older than  
25 18 in the United States?

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1 MR. PETROSINELLI: Object to  
2 the form.

3 THE WITNESS: Sorry. So it is  
4 available -- it is for under 18 users.

5 In the US, we have this effort  
6 now to bring a lot of that inference  
7 technology that we've sort of refined  
8 and honed after years in Europe to the  
9 US, if that's your question.

10 And this capability was started  
11 in the US, is not globally everywhere.  
12 We'd like for it to be globally  
13 everywhere.

14 So it's kind of like these two  
15 things are crossing, but of course  
16 it's all part of our ultimately  
17 getting to a global usage, as I  
18 articulated, in terms of our kind of  
19 all-children principle.

20 QUESTIONS BY MS. CONROY:

21 Q. Right.

22 But as of 2023, and as of April  
23 of 2025, this is not available to someone  
24 under 18 in the United States who has  
25 declared their age to be over 18 because the

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1 inference model is not yet active in the US.

2 Correct?

3 MR. PETROSINELLI: Object to  
4 the form.

5 THE WITNESS: Correct. We do  
6 not have the inference model here in  
7 the US for the reasons I highlighted  
8 before, which is, you know, we rolled  
9 it out in accordance with the law in  
10 Europe.

11 It has gotten dramatically  
12 better. I think it has gotten to the  
13 point where I -- we feel comfortable,  
14 or at least I feel comfortable,  
15 stating our intention of rolling it  
16 out here in the US.

17 But we have work to do to get  
18 it to roll out. I want it to be a  
19 very high quality classifier before we  
20 roll it out because of all those costs  
21 that I talked about in terms of false  
22 positives and false negatives. So  
23 that is work that's underway today.

24 QUESTIONS BY MS. CONROY:

25 Q. Do you know if any of the



























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1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA

3 IN RE: SOCIAL MEDIA )  
4 ADOLESCENT ADDICTION/PERSONAL )  
5 INJURY PRODUCTS LIABILITY ) MDL No. 3047  
6 LITIGATION )  
7 ----- )  
8 THIS DOCUMENT RELATES TO: )  
9 ALL ACTIONS )

10 -----  
11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 COUNTY OF LOS ANGELES  
13 UNLIMITED JURISDICTION

14 COORDINATION PROCEEDING ) Lead Case No.  
15 SPECIAL TITLE [RULE 3.550] ) 22STCV21355  
16 )  
17 SOCIAL MEDIA CASES ) JCCP No. 5225  
18 ----- )  
19 THIS DOCUMENT RELATES TO: ) Judge:  
20 ALL ACTIONS ) Carolyn B.  
21 ) Kuhl, Dept.12

22 THURSDAY, APRIL 24, 2025  
23 CONFIDENTIAL - ATTORNEYS' EYES ONLY -  
24 PURSUANT TO PROTECTIVE ORDER  
25

26 - - -

27 Videotaped deposition of Neal  
28 Mohan, held at the offices of Wilson Sonsini  
29 Goodrich & Rosati, 650 Page Mill Road, Palo  
30 Alto, California, commencing at 9:05 a.m.  
31 Pacific Time, on the above date, before  
32 Carrie A. Campbell, Registered Diplomate  
33 Reporter, Certified Realtime Reporter,  
34 Illinois, California & Texas Certified  
35 Shorthand Reporter, Missouri, Kansas,  
36 Louisiana & New Jersey Certified Court  
37 Reporter.

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1 MR. PETROSINELLI: You got --

2 THE WITNESS: Sorry. Yes, I

3 do.

4 QUESTIONS BY MS. CONROY:

5 Q. And that is active in the  
6 United States as well, correct, that  
7 teen-supervised account?

8 A. The teen-supervised account,  
9 but I think you're referring to the Family  
10 Center here.

11 Q. Well, I believe in the UK it's  
12 called -- or in Europe it's called Family  
13 Center, but in the US it's called teen  
14 supervision?

15 A. If -- I believe it's called  
16 Family Center in -- they're two separate  
17 things.

18 Q. Okay.

19 A. There's the supervised  
20 experiences, and then there's this Family  
21 Center, which, within a couple of taps, if  
22 you open up the YouTube app, you can get to,  
23 and it basically shows you what it's -- what  
24 it's describing here.

25 Q. It shows you the number of

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1 up -- your teen's uploads, subscriptions and  
2 comments?

3 A. Yes. That's the design.

4 Q. And is that true in the US as  
5 well?

6 A. Yes.

7 Q. And it's called Family Center  
8 in the US?

9 A. Yeah. We spell it differently  
10 here, but...

11 Q. All right. Just one of those  
12 little --

13 A. Yeah.

14 Q. -- complicating things.

15 It would not, however, inform a  
16 parent of a teenager if the teenager had  
17 inaccurately declared their age.

18 Correct?

19 A. Well, this is -- this is  
20 describing something a little bit different.  
21 So let me just clarify here, which is, this  
22 is a new feature, which is actually being  
23 able to link together two accounts. And so  
24 this is really just based on two accounts  
25 wanting to be linked together, and I believe

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1 it actually works independent of age. I'll  
2 have to confirm that.

3 But the idea here is to --  
4 again, this is input that we got from our  
5 child development experts -- is to really --  
6 especially for teenaged users, is to strike  
7 the balance between actually giving them some  
8 agency and autonomy and freedom and parental  
9 control.

10 So this feature describes  
11 basically a parent being able to go into  
12 Family Center or -- I think it here also is a  
13 link. It might actually take you to the help  
14 center. I'm not sure where this blog links  
15 to.

16 But then you get an invitation  
17 that goes to the account of the child, the  
18 teen in this case, and those two accounts can  
19 then be linked. And when those two accounts  
20 are linked, then you see all of these types  
21 of things.

22 And so it's not dependent on  
23 that sort of criteria that you're describing.  
24 It's like back to the point that I was  
25 making, which is, in addition to, you know,

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1 those sort of 10, 12 different other  
2 safeguards that I was describing, including  
3 some of them highlighted here, we built yet  
4 another capability, which is parents and  
5 sitting down with their children, saying,  
6 hey, I'm comfortable with you using YouTube.  
7 I would love to have this type of a link.

8 As you can see, it gives the  
9 linking account access to some information,  
10 particularly the information that child  
11 development experts told us that are -- that  
12 is most important. And when there's sort of  
13 that voluntarily linking happening, then this  
14 is what's made available.

15 So it's a bit of a different  
16 feature than sort of, like, something that's  
17 turned off or on by default, depending on the  
18 age, just to describe it.

19 Q. Does this -- it says that it  
20 shows something, including the number of  
21 uploads.

22 Does it identify the uploads?

23 A. It does not identify the  
24 uploads in this case, but it will also -- it  
25 does what you -- if you continue to read that

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1 paragraph, it does something that at least  
2 the experts told us was the more important  
3 piece, which is actually the notification at  
4 the moment of upload.

5 And this is actually a really  
6 good example of what I was describing before,  
7 which is, it's important to have multiple  
8 safeguards in place as opposed to just  
9 anchoring on sort of this 18-plus sort of  
10 boundary, what content versus not, because  
11 what the -- what child development experts  
12 have told us is actually the more important  
13 pieces are around the creation and the upload  
14 piece and the sharing piece and the  
15 commenting piece.

16 And so we wanted to design  
17 something that actually addressed that  
18 particular use case because it might turn out  
19 that parents are very comfortable with using  
20 YouTube. You know, it's a learning  
21 application. You know, 90 percent-plus of  
22 teachers use it in the classroom every single  
23 day.

24 And so we didn't want to  
25 restrict that sort of really positive use

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1 case of YouTube at the -- but wanted to make  
2 it -- make it having a feature that actually  
3 addressed the things that some subset of  
4 parents may particularly be concerned about,  
5 which is uploading content, posting, et  
6 cetera.

7 And so that's where this sort  
8 of, like, Family Center account linking piece  
9 came in. Because the idea was, give teens  
10 the ability to explore, develop new  
11 interests, learn new things, but also give  
12 parents some insight into behavior that they  
13 might deem to be areas that they might want  
14 to check in on more.

15 And so as this highlights here,  
16 this was something that was done not just in  
17 partnership with our advisory council  
18 experts, but was also with, you know, pretty  
19 well-respected, highly regarded, child  
20 development experts like common sense  
21 networks, Common Sense Media, et cetera.

22 So, then, you know, this is  
23 another feature that, you know, I'm very  
24 proud of that we sort of layered on top of  
25 it, because it is one of those things that we

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1       were told facilitates that conversation  
2       between parents and their teens, just like  
3       parents and teens have conversations around,  
4       you know, when to get your driver's license  
5       and all of those other things that teens, you  
6       know, go through as rites of passage.

7               Q.       Do you recall if it was ever  
8       discussed whether to add watch time into what  
9       is a shared insight?

10              A.       I can't remember exactly what  
11       set of features were discussed or not, but I  
12       do remember this general concept of actually  
13       having the features address those types of  
14       things that were most important to parents  
15       and what the experts sort of called out and  
16       sort of layering on those things from there.  
17       Because we had things on the watch time side  
18       like the Take a Breaks, et cetera, and this  
19       particular thing was trying to get at sort of  
20       threading that needle in terms of what -- you  
21       know, what we would hear from experts, which  
22       is, yes, this broad corpus is important.

23                      So if a young person spends  
24       three hours on YouTube, you know, learning  
25       how to do algebra, that might be okay. But







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1           this concept in a global sense.

2                       Now, as I described in terms of  
3           the recommendation dispersion before,  
4           different technologies are in  
5           different states for different parts  
6           of the world. As we've talked about  
7           in the case of inference, it was in  
8           different states, just like it was for  
9           the dispersion piece.

10                    But the concept, ideally, is  
11           for this under 18 piece. And the idea  
12           behind this paragraph, just to put it  
13           into context, is what I was alluding  
14           to before, which is, advertising is  
15           the means by which content on YouTube  
16           and, you know, for that matter, really  
17           in other parts of the internet, too,  
18           is available to families of all kind  
19           of economic situations. And so that's  
20           why the -- the post, I felt like it  
21           was important to address that because  
22           it takes money to produce this  
23           content, of course.

24                    (YouTube-Mohan Exhibit 12  
25           marked for identification.)

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1 QUESTIONS BY MS. CONROY:

2 Q. Okay. Let's take a look at  
3 what we're going to mark as Exhibit 12, which  
4 is a large document, but I'm going to direct  
5 you to -- look through it, but I'm going to  
6 direct you to some pages when you're ready.

7 A. Okay.

8 Q. And it's GOOGLE 05867998  
9 through 8083. And the title is, "Age  
10 Assurance Follow-Up, Global Velocity,  
11 January 27, 2025."

12 A. Okay.

13 MR. PETROSINELLI: And do you  
14 want to say what slides you're going  
15 to want him to particularly look at?

16 QUESTIONS BY MS. CONROY:

17 Q. I will.

18 You may want to -- what I'm  
19 going to ask you about, it looks like there's  
20 a little bit of discussion at the very  
21 beginning about your statement in your  
22 February 2025 best -- big bets for the  
23 company.

24 And then I'm going to look at  
25 slide 9. I'm going by the -- I'm going by

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1 the GOOGLE pages now.

2 A. Okay.

3 Q. Slide 22. Slide 24.

4 A. I'm sorry, do you see the  
5 GOOGLE pages?

6 MR. PETROSINELLI: Yes, this  
7 right here. She's just reading off --  
8 so 9 would be this.

9 THE WITNESS: I see. Okay.  
10 9 -- you said 9 and then 24?

11 QUESTIONS BY MS. CONROY:

12 Q. Yeah.

13 And then a couple after that,  
14 but that will give you a --

15 A. Okay.

16 Q. That will give you a start.

17 A. All right. Let me just leaf  
18 through this quickly.

19 Sorry, you said 24. Right?

20 Q. Did I?

21 MR. PETROSINELLI: 22 and 24.

22 THE WITNESS: 22. Okay.

23 Okay. I've -- I haven't looked  
24 at every page, but I have glanced at  
25 it.

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1 QUESTIONS BY MS. CONROY:

2 Q. I'm going to ask you a  
3 question, and you take your time if you want  
4 to look at something more.

5 A. Okay.

6 Q. Let's just look at page 2,  
7 which is a slide that just says, "Age  
8 assurance announcement."

9 A. Uh-huh. I see that.

10 Q. Would this -- would this have  
11 been something you saw?

12 A. Would I have seen this deck?  
13 I may have seen this deck,  
14 yeah.

15 Q. Okay.

16 A. I think so. Again, I don't  
17 remember the specifics of it, but this would  
18 be logical for me to have seen this deck.  
19 Maybe presented to me in a meeting or  
20 something.

21 Q. I will represent to you that  
22 there are some earlier versions of this, and  
23 I used the most recent one, January 27th of  
24 2025, because this was an age assurance  
25 follow-up, so -- and I did see some of the





















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1           A.           Not that I'm aware of. It  
2           doesn't mean that they haven't, but that's  
3           not -- that's not -- I'm not aware of it.

4           Q.           Okay. Then if you move to  
5           slide 22.

6           A.           Okay. 22.

7           Q.           See if there's any kind of a --  
8           this is part of the appendix --

9           A.           I --

10          Q.           -- and --

11          A.           This is what I have.

12          Q.           Yeah.

13          A.           Okay.

14          Q.           I was just going to show you  
15          that it's part of --

16          A.           Oh, sorry.

17          Q.           If you go back a few, there's  
18          an introductory slide that says "appendix."

19          A.           Yeah.

20          Q.           Just so that you'd see it.

21                       And then this slide, 22, says,  
22          "Business Impact."

23                       Right?

24          A.           Yes, I see that.

25          Q.           And this would be the business

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1 impact [REDACTED].

2 Correct?

3 A. I'm not sure.

4 Do you mind if I just --

5 Q. Yeah, take a look.

6 A. -- read this, take a look at  
7 what this is?

8 Okay.

9 Q. Does that help you answer the  
10 question of [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

12 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED].

15 Q. And so was [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

19 MR. PETROSINELLI: Object to  
20 the form.

21 THE WITNESS: [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

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[REDACTED]

19 QUESTIONS BY MS. CONROY:

20 Q. And so just to be -- to be  
21 clear about what we're -- what we're looking  
22 at here, there is a movement announced by you  
23 on February 11th of 2025, to machine-learn  
24 the age of users so that you could determine  
25 who was under 18, either inferred or

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1 | declared.
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2	Right?
---	--------

3	A. (Witness nods head.)
---	-------------------------

4 Q. And then that age assurance has  
5 a financial component or a business impact.

6	Correct?
---	----------

7 MR. PETROSINELLI: Object to  
8 the form.

9 THE WITNESS: Yes. The --  
10 there's, as we've talked about,

[illegible]

21 And I think what this slide  
22 sort of teases out is that despite  
23 this business impact, it's something  
24 that we, you know, declare that we  
25 wanted to do at YouTube because the

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1 models have gotten to the point where  
2 we could have a pretty good inference  
3 model. And so we're willing to take  
4 that financial hit in this particular  
5 case in the interest of rolling out  
6 that model.

[illegible]

19 But we're going to -- our plan,  
20 at least, is to still continue to move  
21 forward despite the business impact.

22 QUESTIONS BY MS. CONROY:

23 Q. So when I look, I see 1  
24 point -- I'm looking right at the top. It  
25 says, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]







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8

QUESTIONS BY MS. CONROY:

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Q.

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MR. PETROSINELLI: Object to

17

the form.

18

THE WITNESS:

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[illegible]

[REDACTED] -- some number of  
 users who might be above 18 are now  
 for some reason classified as below  
 18. And so, therefore, they get a  
 degraded ad experience as well.

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QUESTIONS BY MS. CONROY:

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q. And on the flip side, up until the day that the US implements age inference, personalization does take place with a number of users who are under 18 but have declared themselves to be over 18?

MR. PETROSINELLI: Object to the form.

THE WITNESS: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

But, yes, the inference model -- if your question is, will the inference model include more users as a result of it that get these sort of depersonalized ads, then -- then, yes,









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1 Q. And when I look at the top, [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

5 A. [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED]

7 Q. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

11 MR. PETROSINELLI: Object to

12 the form.

13 THE WITNESS: [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

19 QUESTIONS BY MS. CONROY:

20 Q. [REDACTED]

21 A. [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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1 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED]

5 Q. Conceptually, would you agree  
6 with me that if there is a particular amount  
7 of money that can be calculated for  
8 implementing age inference in the United  
9 States, you could also conceptualize money  
10 that has been earned in the past years  
11 because of the absence of age inference?

12 MR. PETROSINELLI: Object to  
13 the form.

14 THE WITNESS: Yeah,  
15 conceptually I could see that. And,  
16 you know, as I said, the majority of  
17 that gets paid out to our creators in  
18 the case of YouTube.

19 So -- but in this case, despite  
20 this impact, it's something that we've  
21 declared that we want to move forward  
22 with. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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QUESTIONS BY MS. CONROY:

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Q.

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1 2:47. Going off the record.

2 (Off the record at 2:47 p.m.)

3 VIDEOGRAPHER: The time is now

4 2:55. Back on the record.

5 CROSS-EXAMINATION

6 QUESTIONS BY MR. PETROSINELLI:

7 Q. Mr. Mohan, good afternoon. As  
8 you know, I'm Joe Petrosinelli. I represent  
9 Google and YouTube. Just a few questions.

10 Can you tell us your  
11 educational background?

12 A. Sure, yes. I have a bachelor  
13 of science in electrical engineering from  
14 Stanford University, and I have an MBA from  
15 the Stanford Graduate School of Business.

16 Q. And at some point did you come  
17 to work at Google?

18 A. I did, yes.

19 Q. What year was that?

20 A. 2008.

21 Q. And what were your jobs at  
22 Google?

23 A. For a long portion of my career  
24 at Google I was responsible for our display  
25 and video ads business. Ultimately I was the

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1 SVP of that business until about -- towards  
2 the end of 2015.

3 Q. And then what happened at the  
4 end of 2015?

5 A. The end of 2015, I moved over  
6 to YouTube in the capacity of chief product  
7 officer.

8 Q. And what were your  
9 responsibilities as the chief product officer  
10 of YouTube?

11 A. The primary responsibility was  
12 oversight of building all of our products for  
13 our users, for our creators, and also looking  
14 after our content policies and content  
15 moderation because those two things go  
16 hand-in-hand.

17 Q. And you're now the CEO of  
18 YouTube?

19 A. Correct.

20 Q. And when did you become the CEO  
21 of YouTube?

22 A. In February of 2023.

23 Q. Mr. Mohan, what is YouTube?

24 A. YouTube is a video-watching,  
25 creating and sharing site, application. It's

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1 where users from all over the world come to  
2 watch video content, whether it's sports or  
3 music or their favorite content creators.  
4 And so that's what YouTube is. It's a  
5 streaming service that allows people to  
6 consume video content.

7 Q. Do you consider YouTube to be a  
8 social media platform?

9 A. No, we don't.

10 Q. Why not?

11 A. You know, YouTube really is --  
12 it's a streaming service. It's a place where  
13 you go and watch video content, just like you  
14 do -- most of our consumption happens in the  
15 US on television screens now. And so just  
16 like you watch any other video service on TVs  
17 and other places, you watch YouTube.

18 So the primary use case on  
19 YouTube is the consumption of video versus a  
20 place where you go to share content or  
21 connect with your social graph or what have  
22 you.

23 Q. Can children use YouTube?

24 A. Yes, kids can use YouTube. In  
25 fact, one of the applications that we built

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1 at YouTube is called YouTube Kids. I think  
2 it just a few months ago celebrated its  
3 ten-year anniversary. And that's a product  
4 that's designed specifically for young kids  
5 and their parents.

6 And, you know, minors also use  
7 the main app, and we have a number of  
8 features on the main app for them as well.

9 Q. What is supervised experience?

10 A. Supervised experiences would be  
11 one of those features, which is a feature  
12 that parents and their children can use to  
13 manage their experience on the main YouTube  
14 app.

15 It has settings for a reduced,  
16 more limited corpus of content that parents  
17 can set up in discussion with their minor  
18 children.

19 Q. Does YouTube offer any features  
20 that are directed toward children using the  
21 platform safely?

22 A. There are a number of features  
23 that we've built over the years that are  
24 focused on allowing kids to get the rich  
25 benefits of YouTube, the learning platform or

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1     what have you, but to do it in a safe manner,  
2     including things like Take a Break reminders,  
3     Bedtime reminders, the dispersion of content  
4     in our recommendation algorithms that would  
5     be problematic if seen together but, if  
6     dispersed, not so. And a number of other  
7     features and parental controls. The ability  
8     for parents and teens to be able to link  
9     their accounts so that parents have some  
10    supervision over them.

11                   And so a number of features  
12    like are what we've built over the course of  
13    the last several years.

14           Q.       And have some of those features  
15    been added after 2015 when you first came to  
16    YouTube?

17           A.       Yes.

18           Q.       And why did YouTube add those  
19    features?

20           A.       You know, we have -- it goes  
21    back to our philosophy of living up to  
22    responsibility is our primary priority. And  
23    always seeking to continue to improve our  
24    products. It's building multiple layers of  
25    defense to make sure that users reap the

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1 rewards and the benefits of a platform like  
2 YouTube but do it in a safe manner.

3 Q. And does YouTube make  
4 information about these features and how they  
5 work available to parents?

6 A. Yes, extensively. Primarily  
7 through our help center, which is a part of  
8 the product, but also through documentation  
9 on our website, through blog posts, through  
10 newsletters and a number of different places  
11 like that.

12 Q. From what you've observed in  
13 your time working at YouTube, first as the  
14 chief product officer and now as the CEO, has  
15 YouTube taken seriously the safety of its  
16 users?

17 A. Absolutely. It's one of our  
18 top priorities.

19 Q. And from what you've observed  
20 in your time working at YouTube, first as  
21 chief product officer and now as CEO, has  
22 YouTube been committed to the safety of  
23 children who use its platform?

24 A. Of course. Absolutely. It's a  
25 top priority.

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1           Q.       Just a few more questions,  
2       Mr. Mohan.

3                    You were asked some questions  
4       earlier about Google's ads demographic model.

5                    Do you remember that?

6           A.       Yes, I remember that  
7       conversation.

8           Q.       Do you know the specifics of  
9       how the ads demographics model operates?

10          A.       No, I'm not an expert on that.  
11       I haven't -- I haven't been responsible for  
12       ads business for quite some time.

13          Q.       And do you know what data or  
14       signals that tool uses?

15          A.       The ad -- the ads --

16          Q.       Yeah.

17          A.       -- the ads tool?

18                    I couldn't tell you the  
19       specific signals.

20          Q.       And do you know how that ads  
21       model compares to the -- compares to the data  
22       used or modeling for the AADC age inference  
23       model?

24          A.       I do not, no.

25          Q.       Okay. Mr. Mohan, in your time

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1 working at YouTube, first as the chief  
2 product officer and now as the CEO, have you  
3 ever felt that the company has prioritized  
4 profits over user safety?

5 A. I have never felt that way.

6 Q. And in your time working at  
7 YouTube, first as the chief product officer  
8 and now as the CEO, have you ever felt that  
9 the company prioritized watch time over user  
10 safety?

11 A. No.

12 Q. In your time working at  
13 YouTube, first as the chief product officer  
14 and now as the CEO, have you ever seen the  
15 company choose a strategy that put making  
16 money ahead of protecting the safety of  
17 children who use the platform?

18 A. I have not.

19 Q. Would you ever work for a  
20 company that you thought was causing harm to  
21 children?

22 A. I personally would never.

23 MR. PETROSINELLI: That's it  
24 for me.

25 MS. CONROY: I have no further

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1 questions. Thank you.

2 VIDEOGRAPHER: Plaintiff's  
3 counsel total --

4 MR. FLASTER: Excuse me.  
5 Before you -- before you go off the  
6 record -- I'm sorry, this is Eben  
7 Flaster, Shook Hardy. I don't have  
8 any questions for the witness, but I  
9 do want to make a statement for the  
10 record.

11 Joe, can I do that?

12 MR. PETROSINELLI: Sure.

13 MR. FLASTER: Okay. So, again,  
14 Eben Flaster from Shook, Hardy & Bacon  
15 on behalf of Meta defendants.

16 I just want -- I would object  
17 to the protocol employed by the  
18 plaintiff's counsel for handling the  
19 highly confidential competitive  
20 documents and information during the  
21 deposition.

22 Specifically, outside counsel  
23 for codefendants Meta, TikTok and Snap  
24 were essentially forced into a  
25 breakout room during the Zoom depo for

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1           about 30 to 40 minutes with no ability  
2           to regain access to the deposition  
3           until allowed to do so.

4                       So that procedure was  
5           inconsistent with the provisions in  
6           the protective order governing highly  
7           confidential documents. Those  
8           provisions were designed to address a  
9           situation involving in-house attorneys  
10          for the companies, not outside  
11          counsel.

12                      Despite plaintiff counsel's  
13          representation, we've participated in  
14          literally dozens of these company  
15          witness depositions, and this has  
16          never happened before.

17                      So I just wanted to make that  
18          statement.

19                      I don't know if counsel for  
20          TikTok or Snap have any additional  
21          comments or if they want to join my  
22          objection, but I wanted to make that  
23          statement for the record.

24                      MS. KUMAR: This is Poonam  
25          Kumar from Gibson Dunn on behalf of

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1 the TikTok defendants. We join in  
2 that as well.

3 MS. KONSTANTINOVSKY: This is  
4 Julia Konstantinovsky from Munger  
5 Tolles & Olson on behalf of Snap, and  
6 we also join in the objection.

7 MR. FLASTER: That's all.  
8 Thank you.

9 MR. PETROSINELLI: Thank you.

10 VIDEOGRAPHER: Okay.

11 Plaintiff's counsel's total time on  
12 the record was 4 hours and 1 minute.

13 Defense counsel's total time on  
14 the record was 7 minutes and  
15 30 seconds.

16 The time is now 3:04. This  
17 concludes the deposition. We're going  
18 off the record.

19 (Off the record at 3:04 p.m.)

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CERTIFICATE

I, CARRIE A. CAMPBELL, Registered  
Diplomate Reporter, Certified Realtime  
Reporter and Certified Shorthand Reporter, do  
hereby certify that prior to the commencement  
of the examination, Neal Mohan, was duly  
sworn by me to testify to the truth, the  
whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the  
foregoing is a verbatim transcript of the  
testimony as taken stenographically by and  
before me at the time, place and on the date  
hereinbefore set forth, to the best of my  
ability.

I DO FURTHER CERTIFY that I am  
neither a relative nor employee nor attorney  
nor counsel of any of the parties to this  
action, and that I am neither a relative nor  
employee of such attorney or counsel, and  
that I am not financially interested in the  
action



-----  
CARRIE A. CAMPBELL,  
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