

Exhibit 732

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

Privileged

Teen (Unsupervised) Viewer Wellbeing and Safety (DRAFT)

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Problem Statement and Background^{J2}

Our northstar principle is that YouTube should be a positive in the lives of teens, that it should be time well spent. The good news: amidst the heated debate about social media's impact on teen wellbeing (i.e. warning labels proposed by the U.S. Surgeon General) with rapidly evolving regulations (SMB bills and KOSPA), YouTube is seen as more positive than competitors by teens¹, parents², and even some KOFs³. This is largely due to our valuable content where teens can go deeper to explore & learn, as well as the trust we established through early industry leadership on responsibility (e.g first to launch take-a-break reminders, combating misinfo, etc).

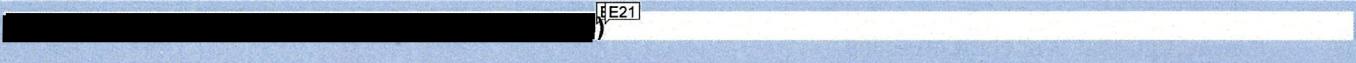
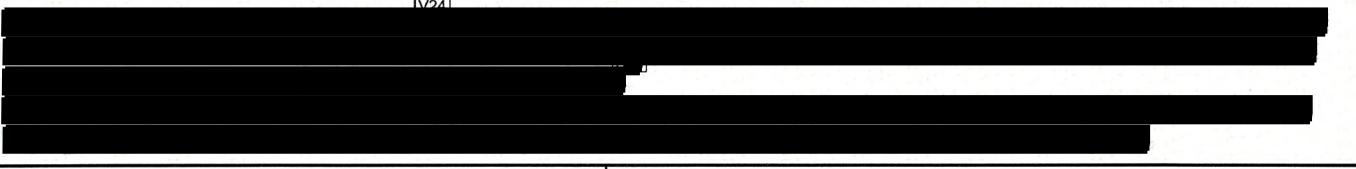
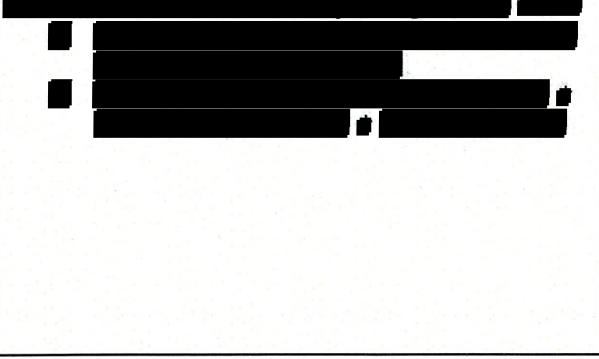
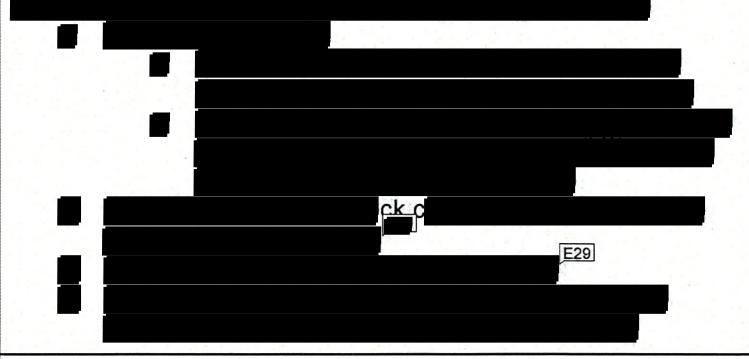
However, we still have work to do on the two biggest challenges^{E7} for teen wellbeing on YouTube:

- (1) low quality content^{E9} recommendations that can convey & normalize unhealthy beliefs or behaviors
- (2) prolonged unintentional use displacing valuable activities like time with friends or sleep.

These concerns are loudest on short form content (more popular with teens) due to its lack of depth and infinite feed experience.^{E16}

While we have made important progress on both in 2023 & 2024, we are playing catch-up to the expectations of teens and parents (and regulators) on these issues. Similar work for MFK took ~5 years to fully come to fruition, which is time we don't have. To make a noticeable improvement in the product experience for unsupervised teens, we need to accelerate & land a cohesive set of solutions (P0s) below in 2025.^{E20}

Solution | Current and proposed

 <p>E21</p>  <p>E21</p>  <p>E26</p>  <p>ck.c E29</p>  <p>E27</p>  <p>E28</p>	

¹ 65% of teen girls said YouTube has had a "mostly positive" impact on their lives. (source: [Common Sense Media report, page 6](#))

² 72% of US parents agree that "YouTube is a positive in my teen's life," significantly higher than competition (source: [YouTube parent of teens narrative research 2024](#))

³ "No, I can't imagine banning YouTube from kids lives - YouTube is a very very important platform." - *Jonathan Haidt, author of Anxious Generation (on NYTs Hard Fork Podcast)*

⁴ Issues identified through our child development experts ([OWLs](#)), parents ^{M51} and resident health experts (1).

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2025 Success Metrics

[add info here]

- How will we know we succeeded in 2025?
 - Digital consumer / digital citizen - empowered to think critically
- What will we look at in 2025 to know whether our hypothesis/idea/strategy is succeeding?
- What 2-3 success metrics can we measure?
 - (Time Well Spent) < mosei@: My understanding from Felipe is that it's a yearly parent survey, so not suitable. But something in this spirit I think could be helpful
 - Helpfulness Score via HaTS
 - gFeedback Volume ("turn off shorts")
 - Launch and adoption of features

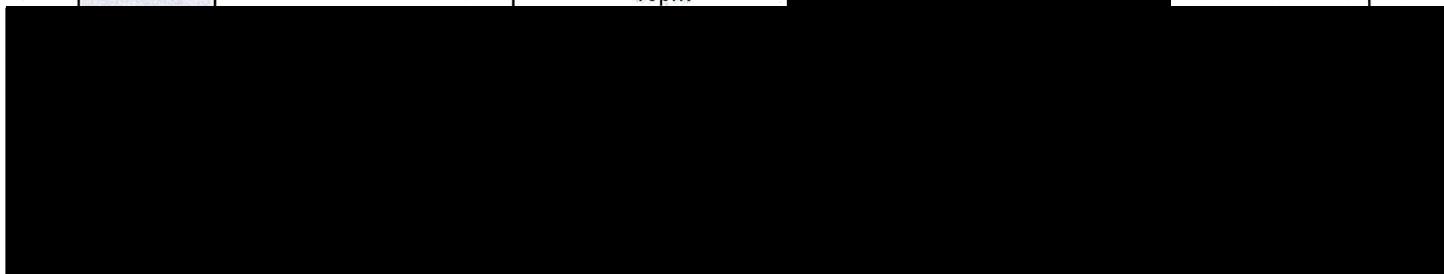
Discussion Questions

- How will you start the discussion?
- List of ~3 questions that need xfn alignment and that you'd really like the group's input on

APPENDIX**Questions**

Prompt We have had success with Vibe and are looking to scale it now, but for MFK the substantial benefits took ~5 years to materialize - should we look to accelerate here? We don't know if our break and bedtime reminders 'work' (and haven't looked too deeply). What is YT's responsibility in this area? Should we do more sensitive Research to understand better, especially for Shorts?

		Day time Use	Night time Use	Autoplay
Target User	Take a Break (App level - shorts + vod)		Bedtime Reminder (App level - shorts + vod)	
	18+	Default Off	Default Off	
U18	Default = ON Default duration = 60min		Default = ON Default trigger time = 10pm	Continuous play without the need to select the next video
				Default ON
				Default = OFF



Supervised users (SupeX)	Default = ON <i>Should we add parent control? For e.g Parent can set Always ON and change duration</i>	Default = ON <i>Should we add parent control? For e.g Parent can set Always ON and change trigger time</i>	Default = OFF Parents can lock setting to OFF, overrides user setting

