

AMENDED Exhibit 1003

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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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT Case No.
ADDICTION/PERSONAL INJURY 4:22-MD-03047-YGR
PRODUCTS LIABILITY LITIGATION

This Document Relates To: MDL No. 3047

ALL ACTIONS

VIDEOTAPED DEPOSITION OF
JOHN M. HARDING

Held At: MORGAN LEWIS
One Market
Spear Tower, 28th Floor
San Francisco, California

March 25th, 2025
9:04 a.m.

Reported By:
MAUREEN O. POLLARD, CSR #14449, RDR

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P R O C E E D I N G S

THE VIDEOGRAPHER: We are now on the record. My name is Alejandro Zamora Ruiz, I am the videographer for Golkow.

Today's date is March 25, 2025, and the time is 9:04 a.m. Pacific Time.

This video deposition is being held at Morgan Lewis at One Market Plaza, Spear Tower, San Francisco, California 94105, in the matter of In Re: Social Media Adolescent Addiction/Personal Injury Products Litigation for the United States District Court, Northern District of California.

The deponent is John Harding.

Counsel will be noted on the stenographic record.

And the court reporter will now introduce themselves and swear in the witness.

THE STENOGRAPHER: My name is Maureen Pollard, California CSR Number 14449.

* * *

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1 Whereupon,

2 JOHN M. HARDING,

3 being first duly sworn to testify to the truth, the
4 whole truth, and nothing but the truth, was examined
5 and testified as follows:

6 EXAMINATION

7 BY MR. DRAPER:

8 Q. Good morning, Mr. Harding.

9 A. Good morning.

10 Q. My name is Glenn Draper, and I'm one of
11 the attorneys for the kids and families and school
12 districts and other local government agencies who
13 have brought claims against the social media
14 companies including YouTube. I had a chance to
15 introduce myself before the deposition started.

16 We're here in San Francisco today at
17 the offices of the Morgan Lewis law firm to take
18 your deposition. You are appearing pursuant to a
19 notice of deposition that we will go ahead and mark
20 as YouTube-Harding Exhibit 1.

21 (Whereupon, Google-YouTube-Harding-1
22 was marked for identification.)

23 BY MR. DRAPER:

24 Q. And I'll go ahead and hand it to you.
25 And we're going to look at it a little more in-depth

1 in a minute, but it's my habit just to mark those
2 always as the first exhibit.

3 So this deposition is being taken in
4 what's called an MDL, which stands for multidistrict
5 litigation, in federal court, and it will also be
6 used in what is called a JCCP, which stands for
7 Judicial Commission Coordinated Proceeding, in
8 California state court. So you might hear me use
9 both those terms today, MDL and JCCP. It's just the
10 way these cases are grouped together. Okay?

11 A. Okay.

12 Q. Have you ever had your deposition taken
13 before?

14 A. Yes.

15 Q. And when? When did you have it taken
16 before?

17 A. It was quite some time ago, maybe 10,
18 15 years ago.

19 Q. And was it a case that had to do with
20 your work at Google or YouTube?

21 A. Yes.

22 Q. And what was the context of the case?

23 A. It was a patent lawsuit.

24 Q. Patent lawsuit. Okay.

25 And is that the only deposition you've

1 given before today?

2 A. Yes.

3 Q. Ever testified in court before?

4 A. No.

5 Q. I'm sure your attorney has covered some
6 of these rules for a deposition, but I just want to
7 go over them again to make sure you have them in
8 mind. Okay?

9 A. Okay.

10 Q. You've been sworn by the court
11 reporter, which means you're under oath. You're
12 testifying just as though you were sitting in a
13 courtroom before a jury and a judge, right?

14 A. Okay.

15 Q. You understand that?

16 A. Yes.

17 Q. Okay. And, in fact, you might hear me
18 or your attorney refer to the jury today even though
19 they're not physically present. Okay?

20 A. Okay.

21 Q. And that's because the deposition is
22 being recorded -- you can see the video camera, I'm
23 sure -- and the video and the written transcript may
24 be presented later in court or used for any other
25 purposes authorized under state or Federal Rules of

1 procedure and evidence.

2 Do you understand?

3 A. I do.

4 Q. Any questions about that?

5 A. Not right now.

6 Q. Okay. It's important you answer my
7 questions today verbally because the court reporter
8 is taking down everything that we say, so if you nod
9 or answer with something like uh-huh or uh-uh, it
10 doesn't really come through on transcript.

11 Do you understand?

12 A. I do.

13 Q. Okay. And it's really important that
14 we not talk over each other because it's hard for
15 the court reporter to take down two people talking
16 at once. I'll do my best to let you complete your
17 answer before I ask the next question, and if you
18 could do your best to let me complete the question
19 before you begin your response, that will make sure
20 we have a clean transcript.

21 Do you understand?

22 A. I do.

23 Q. Okay. You're doing great so far.

24 I'll tell you that I sometimes struggle
25 with this, so you can expect that we're going to

1 have to stop and do it over again to make sure we
2 have a clean record where we're not talking over
3 each other. It doesn't mean we're doing anything
4 wrong, it's not really a natural way to talk. But,
5 you know, if I ask you to repeat an answer or to let
6 me make sure I finish an answer -- or finish a
7 question before you begin your response, I'm just
8 doing it to make sure we have a clean record. All
9 right?

10 A. Okay.

11 Q. Okay. If you don't understand my
12 question, just ask me to repeat it or rephrase it
13 and I will. Okay?

14 A. Okay.

15 Q. You're represented by an attorney
16 today?

17 A. Yes.

18 Q. Lauren White, right?

19 A. Yes.

20 Q. Your attorney might have some
21 objections to some of my questions today. Let her
22 complete the objection before you respond. Most of
23 the time I think your attorney is going to tell you
24 to go ahead and answer the question despite the
25 objection, and that's so we can take the transcript

1 to the Judge later, get a ruling on the objection.
2 If the objection is overruled, we don't have to come
3 back and ask the question, we already have the
4 answer. If the objection is sustained, the Judge
5 will toss out the question and the response to it.
6 But it's just so the whole process goes faster.
7 Okay?

8 A. Okay.

9 Q. So there will be a few times today --
10 there may be a few times today where your lawyer
11 tells you not to answer the question, so that's
12 another reason to let her finish the objection
13 before you answer. Okay?

14 A. Okay.

15 Q. There will be a few times today where
16 we're all talking at once and we'll have to stop and
17 do everything over sequentially, question,
18 objection, answer, happens most every deposition.

19 Do you understand?

20 A. I do.

21 Q. You can take a break today when you
22 want. I usually like to break about every
23 90 minutes. If you want one sooner, just ask. The
24 only rule is you have to answer the pending
25 question, right?

1 Do you understand?

2 A. I do.

3 Q. Anything that would affect your memory
4 or ability to tell the truth today?

5 A. No.

6 Q. You haven't taken any medications that
7 might make it difficult to you -- or difficult for
8 you to concentrate or remember?

9 A. No.

10 Q. All right. Got a good night sleep last
11 night?

12 A. Yes.

13 Q. Excellent.

14 Questions at all kind of before we
15 begin?

16 A. No, not right now.

17 Q. Okay. So you're represented today by
18 Lauren White from the Wilson Sansoni firm, correct?

19 A. Correct.

20 Q. She also represents Google and YouTube.
21 You understand that?

22 A. I do.

23 Q. When did you find out we had requested
24 your deposition in this case?

25 A. I believe it was five or six weeks ago.

1 Q. Have you met with Ms. White who
2 represents Google and YouTube to prepare for the
3 deposition?

4 MS. WHITE: You can answer that yes or
5 no.

6 THE WITNESS: Yes.

7 BY MR. DRAPER:

8 Q. I don't want to ask about the content
9 of any of your meetings with the attorneys, but I
10 want to ask a little bit about the circumstances of
11 those meetings. Okay?

12 A. Okay.

13 Q. When was the first time you met with
14 the attorneys?

15 A. Soon after I found out about the
16 deposition, about five or six weeks ago, I think.

17 Q. Okay. How many times have you met with
18 them?

19 A. Four, I believe.

20 Q. And about how long total would you say
21 that you've spent with them preparing for this
22 deposition?

23 A. Approximately ten hours.

24 Q. Okay. All right. So now we're going
25 to get to what we have marked as YouTube-Harding

1 Exhibit 1. This is the Notice of In-Person
2 Videotaped Deposition of John Harding.

3 Have you seen this document before?

4 A. Let me take a look.

5 Q. Sure.

6 A. I don't believe I have.

7 Q. Okay. There is on page 2 a request
8 that you bring certain documents with you to the
9 deposition, and I'd like to go through those
10 document requests and see if you have any of those
11 documents with you even though you haven't seen the
12 notice. Okay?

13 A. Okay.

14 Q. Are you there? Do you see on the
15 bottom around line 21 at page 2 --

16 A. I see this.

17 Q. Right.

18 -- "Please Take Further Notice," and
19 then it has a list.

20 A. Okay.

21 Q. Okay. Number 1 is, "All documents and
22 communications used to refresh the witness's
23 recollection."

24 When you were meeting with Ms. White or
25 other attorneys for Google and YouTube, did you

1 review any documents or communications?

2 MS. WHITE: You can answer that yes or
3 no.

4 THE WITNESS: Yes.

5 BY MR. DRAPER:

6 Q. Okay. Did those documents or
7 communications refresh your recollection about the
8 events that were described in those documents or
9 communications?

10 A. No.

11 Q. No. Okay.

12 MR. DRAPER: Have all of the -- and
13 this is directed to your attorney actually,
14 not to you.

15 Have all of the documents that the
16 witness reviewed been produced and marked
17 with a Google Bates stamp in this
18 litigation?

19 MS. WHITE: They have.

20 MR. DRAPER: Okay.

21 BY MR. DRAPER:

22 Q. Okay. Number 2, sir, is a copy of your
23 curriculum vitae. And your attorneys forwarded us
24 yesterday a copy of your LinkedIn profile that has a
25 list of your professional history and

1 accomplishments. So that will suffice for that one.

2 Number 3 is the employee custodial
3 file.

4 MR. DRAPER: An, was that produced in
5 this case.

6 MS. TRUONG: Yes.

7 MR. DRAPER: Great. We got it.

8 BY MR. DRAPER:

9 Q. Did you make any notes to help you for
10 this deposition, sir?

11 A. No.

12 Q. Okay. That takes care of number 5.

13 All right. I don't want to ask about
14 any of the rest of them.

15 Okay. Let me ask you a little bit
16 about your background, okay? So you're currently
17 the vice president of engineering for YouTube Music
18 and YouTube Premium?

19 A. That's correct.

20 Q. Okay. And who do you report to in that
21 role?

22 A. Scott Silver.

23 Q. Okay. And you have had that position
24 since 2017?

25 MS. WHITE: Objection.

1 Is there a question?

2 MR. DRAPER: Yes, that's a question.

3 BY MR. DRAPER:

4 Q. Have you had that position since 2017?

5 A. Yes.

6 Q. All right. Prior to that you were the
7 vice president of engineering for emerging
8 experiences at YouTube, right?

9 A. That's correct.

10 Q. Okay. You had that position from 2015
11 to 2017, correct?

12 A. That's correct.

13 Q. Okay. And emerging experiences means
14 that you worked on the engineering for non-core
15 YouTube experiences, things like YouTube Living
16 Room, right?

17 A. Correct.

18 Q. YouTube Living Room is a version of
19 YouTube designed to be seen on a television and
20 watched similar to Netflix?

21 A. That's correct.

22 Q. Okay. And you also worked on YouTube
23 Live which involves live broadcasts on YouTube?

24 MS. WHITE: Objection. Is there a
25 question?

1 MR. DRAPER: Yes, that's the question.

2 BY MR. DRAPER:

3 Q. Did you work on YouTube Live which
4 involves live broadcasts on YouTube?

5 A. Yes.

6 Q. Okay. And you also worked on YouTube
7 Gaming, correct?

8 A. Correct.

9 Q. And YouTube Music, correct?

10 A. That's correct.

11 Q. All right. And you would agree with me
12 that music and gaming are two areas that are
13 critical for YouTube's efforts to attract young
14 users?

15 MS. WHITE: Object to form.

16 THE WITNESS: We view them as key
17 efforts for all of YouTube's users.

18 BY MR. DRAPER:

19 Q. Okay. And isn't it true that most of
20 the music and gaming users are on the younger side
21 at YouTube?

22 MS. WHITE: Object to form.

23 THE WITNESS: I don't actually have
24 that data in memory.

25 ///

1 BY MR. DRAPER:

2 Q. Okay. All right. Before you were vice
3 president of engineering for emerging experiences,
4 you were an engineering director at YouTube from
5 2010 to 2014, is that right?

6 A. That's correct.

7 Q. Okay. And in that role you were part
8 of the core engineering team, right?

9 A. That's correct.

10 Q. Okay. And you worked on things like
11 building out YouTube's infrastructure and
12 operations, video ingestion processing, streaming,
13 playback, data warehouse, that kind of thing, right?

14 A. That's correct.

15 Q. All right. And before you were an
16 engineering director you were an engineering manager
17 at YouTube from 2007 to 2010, right?

18 A. That's correct.

19 Q. Okay. The engineering manager position
20 at YouTube was your first job at YouTube, correct?

21 A. That's correct.

22 Q. All right. And prior to that you were
23 a software engineer at Google from 2005 to 2007?

24 A. That's correct.

25 Q. All right. And at Google, one of the

1 things you worked on was the Google video player, is
2 that right?

3 A. That's correct.

4 Q. All right. Okay. That's your
5 background out of the way. I want to ask you some
6 things about your day-to-day work at YouTube now.
7 All right?

8 A. Okay.

9 Q. What are the different ways you
10 communicate with your coworkers at YouTube?

11 A. We use Gmail, we use Google Chat, we
12 talk in person, we use Google Meet for
13 videoconferencing, occasionally phone calls. And
14 then we use documents like Google Docs, Google
15 Sheets, Google Slides.

16 Q. Okay. And I've seen in the documents
17 fairly often offsite meeting notes. Is that kind of
18 a regular thing that's done at YouTube?

19 MS. WHITE: Object to form.

20 THE WITNESS: Teams will have, like,
21 offsite strategy meetings or fun events,
22 yes.

23 BY MR. DRAPER:

24 Q. Okay. All right. Are you one of those
25 people who routinely cleans out their e-mail inbox?

1 A. What do you mean by "clean out"?

2 Q. Well, there are some people -- I'm not
3 one of them, but there are some people who will
4 delete e-mails when they've read them or when they
5 think they no longer need them, and then there's
6 other people, I am one, who like never delete
7 anything and just let it sit.

8 A. I don't delete my e-mails generally. I
9 use Gmail's archive feature which keeps them but
10 removes them from my inbox.

11 Q. Okay. Do you have any form of auto
12 delete that applies to your e-mails, sir?

13 A. I don't believe so.

14 Q. Okay. I've seen lots of Google slide
15 presentations in the YouTube documents. Seems like
16 a pretty common way to present information to fellow
17 YouTube employees, right?

18 A. Yes.

19 Q. Do you keep a file of the Google slide
20 presentations you've worked on?

21 MS. WHITE: Object to form.

22 THE WITNESS: I don't keep a file.

23 Google Slides just has them all.

24 BY MR. DRAPER:

25 Q. Okay. All right. Do you work on a

1 laptop or a desktop?

2 A. Primarily a laptop.

3 Q. Okay. And do you keep any work files,
4 e-mails, Google slide presentations stored locally
5 on your computer as opposed to stored in a larger
6 company-wide storage system?

7 A. No. I use the cloud storage.

8 Q. So you mentioned Google Chats. Is that
9 a common or uncommon feature that you use to
10 communicate with people at YouTube?

11 A. It's fairly common.

12 Q. All right. I understand that Google
13 Chats has a setting, I think it's called "history
14 off," so that chats aren't saved for more than a
15 short period.

16 Do you understand that?

17 A. I've heard of that feature.

18 Q. Okay. Do you know how it works?

19 A. I do not.

20 Q. Is it your habit to leave history on,
21 or do you usually have history off?

22 A. I don't do any changes to the history
23 settings.

24 Q. Okay. Have you ever been asked by
25 anyone at YouTube to turn history off in a specific

1 chat string?

2 A. I don't believe so.

3 Q. Do you have an official work phone
4 provided to you by YouTube for your business
5 purposes?

6 A. No.

7 Q. Do you have a personal phone?

8 A. I do.

9 Q. Do you ever use your personal phone to
10 communicate with other YouTube employees about work?

11 A. Yes.

12 Q. Do you text with other YouTube
13 employees about work from your personal phone?

14 A. No.

15 Q. So how do you communicate with them
16 from your personal phone?

17 A. Voice calls.

18 Q. Voice calls. Okay.

19 Mr. Harding, do you agree that a
20 corporation should not release an application
21 designed for teens and younger kids without knowing
22 that the application is safe for them?

23 MS. WHITE: Object to form.

24 THE WITNESS: I think when we release
25 applications we try to balance the needs of

1 founded, the founders knew they wanted to have a
2 video hosting site but they weren't sure exactly
3 what type of video hosting site it would be?

4 MS. WHITE: Objection. Lacks
5 foundation.

6 THE WITNESS: I don't know what their
7 plans were when they founded it.

8 BY MR. DRAPER:

9 Q. Did you know that they considered
10 having YouTube be a video dating site?

11 MS. WHITE: Objection. Lacks
12 foundation.

13 THE WITNESS: I heard lots of different
14 stories about founding lore of the company.

15 BY MR. DRAPER:

16 Q. Is that one of them?

17 A. That is one of the stories.

18 Q. Okay. All right. Would you agree with
19 me that in the time that you have been at YouTube
20 since 2007, growth, however it's been measured, has
21 been an important goal at YouTube.

22 MS. WHITE: Objection to form.

23 THE WITNESS: Growth of value is
24 probably the main thing we look at, are we
25 delivering value for the ecosystem.

1 BY MR. DRAPER:

2 Q. However it's measured, growth has been
3 an important goal at YouTube in the time you've been
4 there?

5 MS. WHITE: Objection to form.

6 BY MR. DRAPER:

7 Q. Correct?

8 MS. WHITE: Objection to form.

9 THE WITNESS: Growth of the value that
10 we're delivering through the product, yes.

11 BY MR. DRAPER:

12 Q. I see.

13 When you were the engineering director
14 at YouTube from 2010 to 2014, one of your jobs was
15 to make sure that the YouTube infrastructure, the
16 equipment and software that makes YouTube run, video
17 ingestion, processing streaming, one of your jobs
18 was to make sure that infrastructure was capable of
19 handling the growth that was planned, right?

20 MS. WHITE: Objection to form.

21 THE WITNESS: That's correct.

22 BY MR. DRAPER:

23 Q. All right. From early on YouTube set
24 very ambitious goals for itself in terms of growth,
25 right?

1 Q. Okay. And this document is an e-mail
2 from [REDACTED] on behalf of [REDACTED] at Google
3 to [REDACTED] at Google.

4 Do you recognize any of those names?

5 A. Yes.

6 Q. And who are they, please?

7 A. [REDACTED] was a product manager. I
8 don't -- I don't know what Kubrik is. [REDACTED],
9 the name is familiar, but I don't recall what he
10 did.

11 Q. Okay. All right. And this is an
12 e-mail string dated June of 2012, correct?

13 A. That's what it appears to be.

14 Q. All right. And if you look, sir, at
15 the bottom of the second page, [REDACTED] is
16 described as the engineering manager for Player at
17 YouTube.

18 Do you see that?

19 A. I do.

20 Q. Do you recall that position?

21 A. I recall that as a position.

22 Q. Okay. Do you agree that since this
23 document was found in your custodial file that it
24 was sent to you somehow?

25 MS. WHITE: Objection. Lacks

1 foundation.

2 THE WITNESS: I don't know how things
3 would end up in whatever custodial file it
4 is.

5 BY MR. DRAPER:

6 Q. All right. Any reason to think that
7 this document is not what it appears to be, an
8 e-mail between coworkers at YouTube?

9 MS. WHITE: Objection. Lacks
10 foundation.

11 THE WITNESS: That's what it seems to
12 be.

13 BY MR. DRAPER:

14 Q. All right. If you look at the part of
15 the e-mail on the first page that was sent on
16 June 7, 2012 from [REDACTED], it's designated as
17 "Notes from iOS Creator App review."

18 Do you see that?

19 A. I do.

20 Q. All right. And then down below that it
21 says "Value prop."

22 Do you see that?

23 A. I do.

24 Q. All right. And the last item for Value
25 prop is, "Goal is not viewership, it's viewer

1 addiction."

2 Do you see that?

3 A. I do.

4 Q. Okay. So you would agree with me that
5 at least ██████████ had in mind to make the YouTube
6 application addictive as of June of 2012?

7 MS. WHITE: Objection. Lacks
8 foundation, mischaracterizes the document.

9 THE WITNESS: I don't know what he had
10 in mind. The context of this document is
11 about a video creation app, so that last
12 sentence doesn't even make sense because
13 the video creation app -- that's what
14 Kubrik was, Kubrik was a code name for our
15 video creation app that we built at one
16 time. I don't know, that wasn't even built
17 for viewers, it was built for creators.

18 BY MR. DRAPER:

19 Q. And was it going to be integrated into
20 the YouTube application?

21 A. I don't think so.

22 Q. Was it released separately ever?

23 A. I'm not sure if it ever released. I
24 think it did, but I'm not sure.

25 Q. I'm sorry, you said you didn't know

1 application every day?

2 MS. WHITE: Objection. Lacks
3 foundation.

4 THE WITNESS: Again, I don't agree with
5 the framing of the question, but I still
6 don't know what warnings we do or don't
7 issue.

8 BY MR. DRAPER:

9 Q. And did YouTube ever warn parents or
10 children that it had set out to create an addictive
11 application?

12 MS. WHITE: Objection. Lacks
13 foundation.

14 THE WITNESS: Again, I don't agree with
15 the premise, and I don't know what warnings
16 we do or don't issue.

17 BY MR. DRAPER:

18 Q. All right. Do you agree with me, sir,
19 that by 2017 or 2018 addiction to social media was a
20 concern both inside and outside of YouTube?

21 MS. WHITE: Objection. Lacks
22 foundation.

23 THE WITNESS: It's out of my area of
24 responsibility and so I wasn't tracking
25 when things would have been on radar. We

1 don't typically think of YouTube as social
2 media, we're a video distribution platform,
3 so the framing wouldn't apply. But maybe I
4 misunderstood the question.

5 BY MR. DRAPER:

6 Q. Why don't you think of YouTube as a
7 social media platform?

8 A. We're primarily about creators
9 distributing video to an audience. It's not a
10 social interaction platform. Again, it's video
11 distribution/consumption for creators to build
12 businesses on.

13 Q. At one time YouTube had the ability to
14 send direct messages from user to user, correct?

15 MS. WHITE: Objection. Lacks
16 foundation.

17 THE WITNESS: That is correct.

18 BY MR. DRAPER:

19 Q. And that feature was created in hopes
20 of fostering communities and allowing people to
21 discuss privately videos that they were watching?

22 MS. WHITE: Objection. Lacks
23 foundation.

24 THE WITNESS: I believe the direct
25 messaging existed before we bought YouTube,

1 A. I don't believe I have.

2 Q. The next bullet point is for "Late
3 night use."

4 Do you see that?

5 A. I do.

6 Q. And it says, "7 percent of teens on
7 YouTube watch past midnight on school nights."

8 Correct?

9 A. That is what's written here.

10 Q. And when it talks about 7 percent of
11 teens on YouTube, it's talking about declared teens,
12 right?

13 MS. WHITE: Objection. Lacks
14 foundation.

15 THE WITNESS: I'm not familiar with the
16 document, so I don't know how they're
17 determining that.

18 BY MR. DRAPER:

19 Q. All right. Are you familiar with the
20 distinction between declared teens and inferred
21 teens at YouTube?

22 A. I've heard of the distinction, but I
23 don't understand the details of how they're defined.

24 Q. You understand that a declared teen is
25 someone who would be a teenager according to the

1 Do you see that?

2 A. I do.

3 Q. All right. And then the next bullet
4 point is "Unintentional use," and it says, "Among
5 users 18-24 years old, 23 percent report 'losing
6 track of time on YouTube.'"

7 Do you see that?

8 A. I do.

9 Q. "20 percent report 'procrastinating on
10 YouTube.'"

11 Do you see that?

12 A. I do.

13 Q. "And 20 percent report YouTube
14 'interfered with work, school, or homework.'"

15 Correct?

16 MS. WHITE: Objection to form.

17 Mischaracterizes the document.

18 THE WITNESS: That's what's written
19 here.

20 BY MR. DRAPER:

21 Q. All right. And so at this time in
22 2017, 2018, YouTube's focus on digital wellbeing was
23 concentrated on these areas, habitual heavy use,
24 late night use, unintentional use.

25 Do you agree?

1 extend Watch Next."

2 BY MR. DRAPER:

3 Q. Right. I think we're talking about the
4 same thing. Right? Infinite scroll, it just never
5 stops?

6 MS. WHITE: Objection.

7 Mischaracterizes testimony.

8 THE WITNESS: It might be a nuance in
9 terms. The way I understand this is
10 there's content available, it doesn't
11 scroll on its own, it's just you can keep
12 looking for more.

13 BY MR. DRAPER:

14 Q. You just keep swiping, it's going to
15 keep showing up?

16 MS. WHITE: Objection.

17 Mischaracterizes testimony.

18 BY MR. DRAPER:

19 Q. Right?

20 A. Again, not familiar with the feature,
21 but that sounds correct.

22 Q. All right. Okay. I'm going to move on
23 to another document.

24 You would agree with me, sir, that
25 continued growth remains an important goal at

1 YouTube even today?

2 MS. WHITE: Objection. Lacks
3 foundation.

4 THE WITNESS: Continuing growth of user
5 value, creator value, business value, yes.

6 BY MR. DRAPER:

7 Q. Right.

8 And part of that goal is continuing to
9 refine the recommendation system for YouTube?

10 MS. WHITE: Objection. Lacks
11 foundation, vague.

12 THE WITNESS: Improving our
13 recommendations is one way we hope to
14 deliver more value for all of those users.

15 BY MR. DRAPER:

16 Q. And that includes pushing out the time
17 horizon that YouTube can predict with its algorithm?

18 MS. WHITE: Objection. Lacks
19 foundation, vague.

20 THE WITNESS: I'm not sure what you
21 mean.

22 BY MR. DRAPER:

23 Q. All right. Well, let's look at a
24 document, then. This would be 6768.

25 ///

1 drive watch time?

2 MS. WHITE: Objection.

3 Mischaracterizes the document, lacks
4 foundation.

5 THE WITNESS: I didn't write this, so
6 I'm not sure, but when we talk about
7 predicting, the model would not be
8 necessarily trying to affect future
9 actions, this would be trying to predict
10 what user actions they would take.

11 BY MR. DRAPER:

12 Q. Right. Well, that's how the
13 recommendations model works, right? It estimates if
14 I show -- "I" being YouTube, right -- if YouTube
15 shows the user this video, there is an estimate of
16 how long that user will remain on the platform, will
17 remain consuming YouTube videos, right? That's what
18 the recommendation does, it's a giant prediction
19 engine?

20 MS. WHITE: Objection. Lacks
21 foundation.

22 THE WITNESS: It is making predictions
23 of a number of different possible outcomes.
24 This talks about user actions and
25 satisfaction and valued watch time.

1 BY MR. DRAPER:

2 Q. Right.

3 A. So my read of this is that it is trying
4 to predict what will happen over a longer time
5 period.

6 Q. Exactly.

7 Doesn't that kind of scare you a bit --

8 MS. WHITE: Object --

9 BY MR. DRAPER:

10 Q. -- that the recommendation system is
11 going to get so good that it's going to be able to
12 not only predict what we're going to do in the
13 short-term, but now it's going to start predicting
14 what we're going to do in the longer term, even days
15 ahead?

16 MS. WHITE: Objection. Lacks
17 foundation.

18 THE WITNESS: We're always trying to
19 improve our machine learning models to
20 better understand what users will value,
21 and so being able to take a longer time
22 horizon for a user I think allows us to
23 better understand what they will value.

24 BY MR. DRAPER:

25 Q. Have you heard that the goal behind

1 every view at YouTube is to drive long-term watch
2 time, long-term engagement? Have you ever heard
3 that?

4 A. Not that. I've heard the goal to drive
5 long-term value.

6 Q. And the goal of the recommendation
7 system is not only to predict what will happen, but
8 to influence what will happen by showing you
9 particular videos that are going to cause you to do
10 certain things?

11 MS. WHITE: Objection. Lacks
12 foundation.

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

20 BY MR. DRAPER:

21 Q. I think I understand that.

22 Okay. Another topic.

23 YouTube Shorts is a feature that
24 YouTube released in 2020, correct?

25 A. I don't recall exactly when it

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CERTIFICATE OF COURT REPORTER

I, MAUREEN O'CONNOR POLLARD,
Registered Diplomate Reporter, CSR No.
14449 for the State of California, the
officer before whom the foregoing
deposition was taken, do hereby certify
that the foregoing transcript is a true
and correct record of the testimony
given; that said testimony was taken by
me stenographically and thereafter
reduced to typewriting under my
direction; and that I am neither
counsel for, related to, nor employed
by any of the parties to this case and
have no interest, financial or
otherwise, in its outcome.

Dated this 4th day of April, 2025.

Maureen O. Pollard

MAUREEN O'CONNOR POLLARD
CSR No. 14449