

AMENDED Exhibit 1172

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

Short-video war? - Competitor overview of IG Reels, Youtube Shorts & Triller

2020/10 TikTok Strategy

TikTok Strategy- What do we do?

- * Strategy
 - Country prioritization & resource allocation (e.g. Creator fund)
 - Content-related sector coverage (e.g. Live-streaming, e-commerce, gaming, music, product strategy)
 - Regional user strategy business partner (thinking partner for regional heads)
 - Competitor analysis
 - TikTok related org projects
- * OKR setting
 - e.g. DAU in every region, live streaming penetration target
- * Global User research
 - Qualitative & quantitative user research across the globe
- * Data

Executive Summary

Starting from July, most of the competitors starts to launch in-app short-videos features. The key competitor are Reels, Youtube Shorts.

Instagram Reels is a short video feature within Instagram that feels very much like TikTok, where users can watch 30-second videos as well as create their own. Currently around **80% of top creators also posted on Reels.**

YouTube Shorts currently only tested in India. It's an upgrade of previous "short-videos". It does not have as many features as TikTok and currently don't have much splash.

Tier 1 competitors:

[REDACTED]

Time Range: 10.11-10.17

Regional Competitors

Overall we don't think Triller is a big threat to TikTok globally as its video contents are not strong and diverse, but it would gain temporary momentum when TikTok app is banned or got the banning rumor.

* However, it was a good music video platform that some musicians will use to record release and Triller could attract some music lovers.

[REDACTED]

Time Range: 8.8-8.15 vs 10.11-10.17

For those apps with >1M DAU and growth rate higher than TikTok, we will highlight with yellow

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[THUMBSUP] 2020-10-28 08:04:18

Commented [3]: @ [REDACTED] Thanks for this overview. Is there a reason Snap is omitted from this table? From an efficiency (auction) perspective, they are one of our closest competitors the US. Also, given recent growth from Snap released last week - would seem timely information.

[JIAYI] 2020-10-28 07:30:27

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Instagram Reels

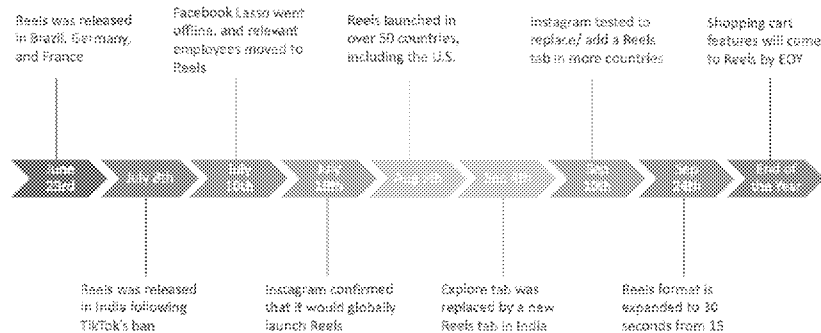
For more information, please find [HYPERLINK]

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What Is Reels?

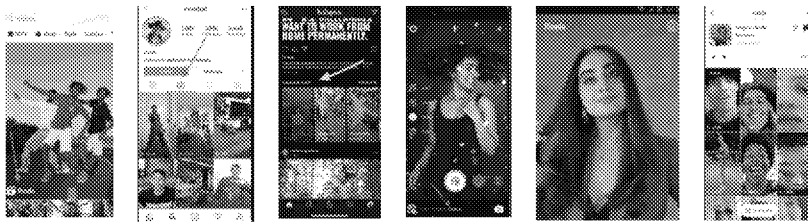
In one sentence, Reels is a new content format for Instagram that allows users to create and share 30-second videos to followers.

A Brief History



How to Access Reels?

Access points: Reels can be accessed through a bunch of entrances – Explore tab, Stories, profile Reels tab, suggested carousel in the main feed, the main feed as a regular post. You can create a Reel from 1) within Stories as a new format or 2) the camera icon on the upper right corner when you're watching Reels 3) the audio page. The variety of entrance points to Reels shows the level of attention this feature has received from Instagram.



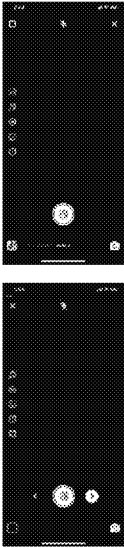
(Access to consuming/ creating Reels)

How to Create Reels?

Reels creation feels quite similar to TikTok but with only 6 tools: length, audio, speed, effects, timer, align. The filters for Reels are the same as what one could use for Stories with options from an extensive AR filter platform.

Feature	Details
Length	You can choose from the two options: 15 or 30 seconds.
Audio	You can choose from saved, trending, for you, or categorized music. Search is available as well.

Speed	0.3x, 0.5x, 1x, 2x, 3x
Effects	You can choose from the entire AR filter libraries of Instagram.
Timer	You can set the length of the clip. A countdown of either 3s or 10s will appear before recording starts.
Align	After you film a segment, you can choose to align the next segment with the last frame so the graphics match.



How Is Reels Different From TikTok?

Difference	Details
Length	TikToks are longer than Reels (60s vs. 30s).
Filters	TikTok filters are preset and can't be customized.
Camera Tools	TikTok offers makeup and flashlight features, which Reels does not currently have.
Featured Badge	Reels offers a featured badge to certain videos picked by Instagram. TikTok doesn't currently have the featured video icon.
Reach	TikTok videos are automatically recommended to its entire user base unless specified otherwise, but with Reels, you have to have a public account to post your Reels on Explore.
Trends	TikTok has more trending challenges and hashtags than Reels, and the UI layout is more friendly to trends.

How Is Reels Received?

User Side

Key Reels advantages were that it appealed to older generations, some users enjoyed having their content centralized on IG (fewer social media apps to use), and already had a larger IG audience than they did on TikTok. (Details [[HYPERLINK](https://bytedance.feishu.cn/docs/doccnC35pKeu72IH2SGURSyA7Bf) "https://bytedance.feishu.cn/docs/doccnC35pKeu72IH2SGURSyA7Bf" \h])

Key Reels disadvantages were that it: 1) added to IG's cluttered Explore feed experience, 2) users had trouble locating *Reels* through Explore feed and the Camera UI, and 3) that users believed pairing *Reels* with IG's algorithm would lead to lots of irrelevant content.

Creator Side

Based on insights, creators with less than 1mil TikTok followers are **73% less likely** to post on Reels. However, overall Reels penetration is high for creators in major markets: 79% U.S. creators have posted at least one Reel, and this number for India is 92%.

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Many creators started to monetize the feature after its global launch. For instance, the first major commercial deal in India was by Mountain Dew, which paid 12 creators to produce Reels videos to promote its product. A shopping cart feature will come to Reels by the end of this year according to [[HYPERLINK](https://www.cnbc.com/2020/10/05/instagram-will-start-tes.html) "https://www.cnbc.com/2020/10/05/instagram-will-start-tes.html" \h].

Triller

For more information, please find [[HYPERLINK](#)]

What is Triller?

A TikTok-like short-video app

- * International expansion plans:
 - Currently 50% in United States, 30% in India
 - 2Q20: EU, Mexico, India

Commented [5]: I think the most important piece of information to include in a competitive ~~snapshot~~ of Triller is the aggressive approach they are taking to compensating creators for joining. Many (the majority) of their deals are non-exclusive, meaning they do not require creators to stop posting to TikTok. Some of the deals do have provisions requiring the creators to post more on Triller than they do on other platforms, including TikTok. Almost all top creator deals include a mix of cash and equity, with projected equity opportunities exceeding \$50MM for some creators in the event of a liquidity event (IPO, sale, etc). Creators have no real affinity for Triller or their product; it's a money land grab that allow them to continue building on other platforms as well, and furthering their social ubiquity. We are starting to see top creators use TikTok to drive to Triller and it is expected this trend will continue. None of the other platforms are compensating creators in this way and we have taken a similar approach, focusing on product innovation, native creator monetization, high tough partner management, and creator/brand marketing to drive growth.

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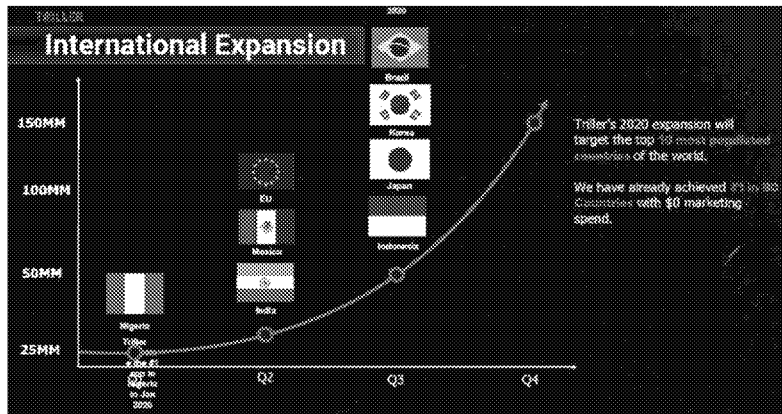
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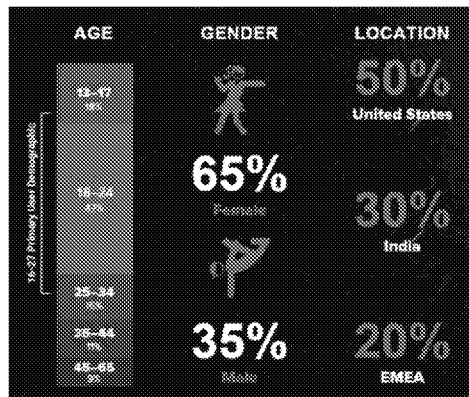
Commented [6]: Adding on here a NYT Article: <https://www.nytimes.com/2020/10/07/style/triller-app-tiktok.html>

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- 3Q20: Brazil, Korea, Japan, Indonesia

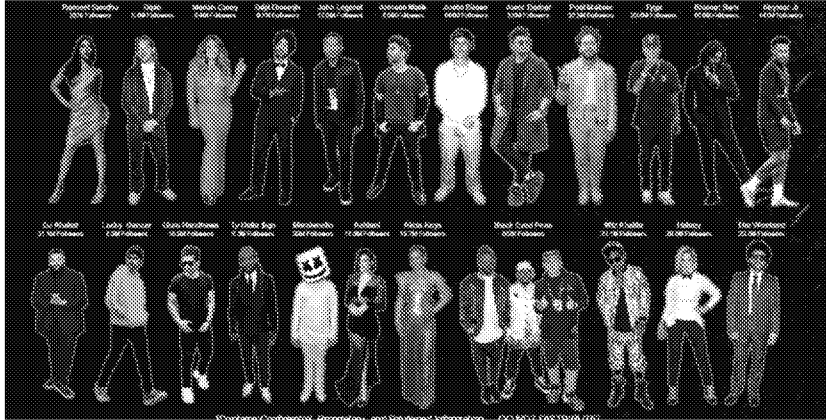


- Mostly organic growth (though with a lot of PR coverage)
- Claimed they have 100M MAU and 28M DAU



Triller's content strategy

- Triller is actively recruiting TikTok creators, offering top creators \$2-5M in equity incentives for non-exclusive deals. Top creator Charli D'Amelio's deal was \$14M, with 50% in equity and she has started to ask her fans to switch to Triller.
- We believe Triller's model is not sustainable, and our ways of native monetization and creator fund are more sustainable in terms of the platforms ecosystem and encouraging organic publishes.



On the product side, Triller's key differentiator over TikTok are:

- Strong link with music
 - Very close to the music industry in the United States and India, introducing musicians to settle in to attract music users
 - Target to be the "MTV" for the new generation, lots of musicians will use Triller for new record release
 - Significant investors from the music industry, including artists
 - Snoop Dogg, Lil Wayne, Kendrick Lamar, managers — Gee Roberson (Co-CEO of The Blueprint Group), Moe Shalizi (founder of The Shalizi Group), Wassim Sal Slaiby (CEO of XO Records)
 - Cooperates with Apple Music to allow users to play full versions of music directly through short videos
 - When creating a video within TikTok a user must use music on TikTok, when using Triller, a user can use music found within the app, or from their Apple Music libraries



- * Users can also save songs to their own playlists and access *Triller playlists*.
 - While a user can listen to a full track on Triller, one can only listen to 30 seconds of a track on TikTok

We are building the MTV for today's generation. The label, artists, and publishers get credit and revenue from streams and the associated streaming fees. Unlike other platforms, TRILLER is dedicated to artist-centric growth and directly helps artists with their billboard charts by elevating their stream counts.

-Bobby Sarnevesht, Executive Chairman of

TRILLER

- * More simple editing features compared to TikTok
 - Triller applies AI technology to video editing. The user takes multiple shots based on the same piece of music, the system will automatically identify the content that best matches the rhythm of the music, and automatically edit and splice into a work.
 - The creative genre is divided into music videos and social videos, which have duration limit of 30 seconds and 10 minutes, respectively; the creators could shoot 10-minute-video under Social Video form, while Tiktok still has a 1 minute limit in most countries

	Tiktok	Triller
Music	* Can only listen to 30 seconds of a song	* Can listen to full songs * Can use music that is in Apple Music

Editing tools	* Larger range of effects, speeds, overlays, etc. * Beauty mode * Ability to pause during the shooting	* AI based, automatic video stitching * Templates related to popular social topics * Slow/fast motion, overlays, text, etc.
Discover page	* Trending hashtags * Promoted campaigns	* Leaderboard (creator ranking based on interactions) * Categorized genre charts * Trending hashtags and promoted campaigns
AI development	* Analyze user's interests and preferences and display a personalized content feed	* Analyze biometric movements of video and adapt them to the beats of the song

Key features

The Triller app is a US-based application launched in 2015, initially positioned as a video editing tool, and gradually transformed into a content platform.

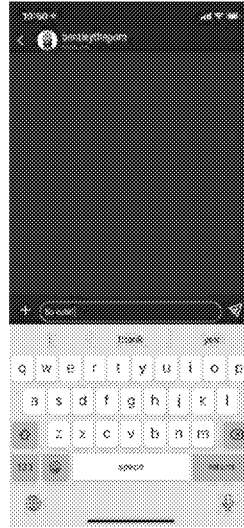
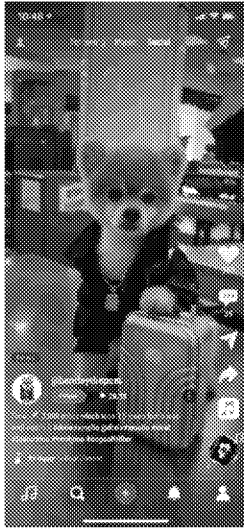
The overall product design **highlights the music attributes**. The default consumption scenario is the Music tab. Users can discover music through short video and **listen to the complete music directly with the built-in player**; Music Video is a separate genre and will automatically associate the complete music with copyright.

The overall app design is relatively rough, the play experience is not smooth with some bugs, so the product experience does not pose a threat to Tiktok.

For users

Start

On the Sep. 17th application update, users can now send [[HYPERLINK](https://mashable.com/article/how-to-use-triller/) "https://mashable.com/article/how-to-use-triller/" \h] (DMs) to others

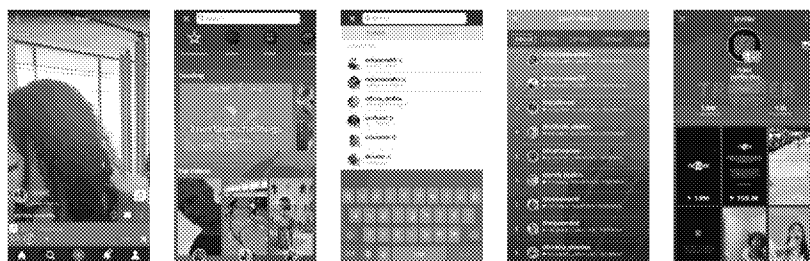


- * Will be having an integration with Snap App Stories - allowing connecting an existing account to a Snap account and showing snaps shared to 'My Triller Story' (the functionality is currently disabled until the feature is publicly launched by Snap, but can be enabled remotely)
- * Users do not need to make interest choices when launching the app -- they can directly see recommended videos
- * **Mute by default, requires the user to manually turn on the sound**
- * After the playback is completed, the next video is automatically played
- * The top is divided into three tabs: **following**, **music** and **social**, hosting the videos of creators who have followed, music videos (within 30s, with music) and social videos
- * At the bottom there are five tabs for home, search, creation, notification, and personal homepage (see below)



Use

- * In the recommendation stream, users can select videos of interest by sliding up and down
- * On the search page, users can find the hottest content by finding channels of different categories; the search presets two branches, people and hashtag, to help users explore content
- * Leaderboard, which is sorted by the number of likes, helps users find interesting creators
- * The author's personal homepage emphasizes historical playback data to help users discover popular content



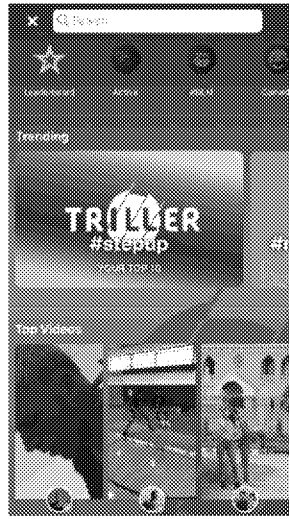
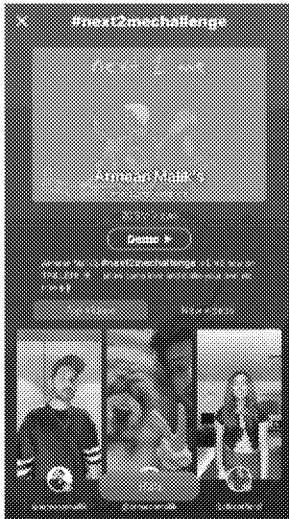
Content

- * Discovered through experience, there is **more content from Europe and America**, and relatively **less local content**
- * Occasionally you can see risky content with pornography and unsuitable for children
- * Some content appears repeatedly on the recommendation page, especially after the user restarts the app

For creators

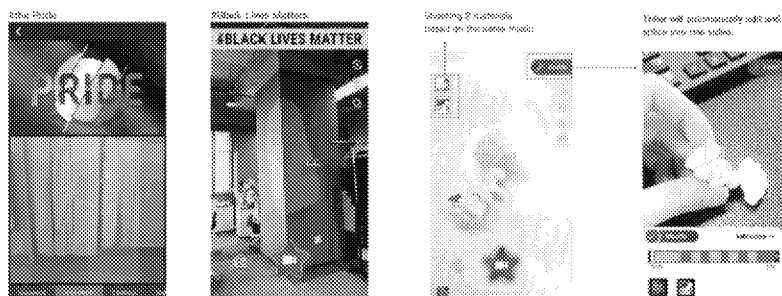
Creation guide

- * The user enters the corresponding topic page through **hashtag**, provides demo and related works of other users, and guides the user to join in the creation of related topics
- * Trending module displays popular creative themes of official operation

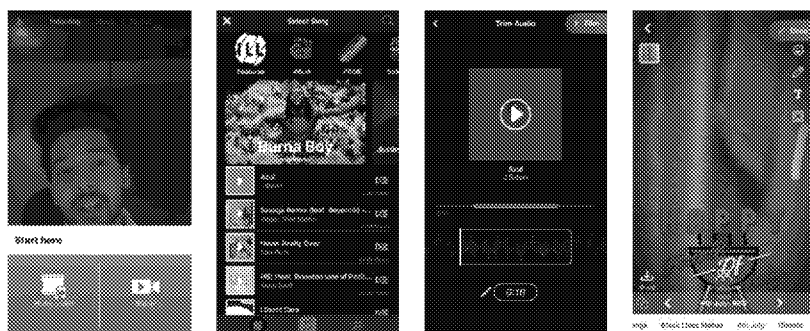


Editing tools

- * **Music video has a 30s time limit; social content has a 10-minute time limit**
(tends to shoot casually)
- * The official provides **a wealth of music for selection, the music is classified by category, including some popular activities, such as pride**
- * In addition to the creators can add emoji, graffiti, text, shadow to the video, Triller also provides sticker templates with different themes to further reduce the threshold of creation
 - Only about 20 kinds of templates and stickers (much fewer than TikTok)
 - Templates of hot events, such as pride month, blakclivematters
- * Triller focuses its AI capabilities on video-editing (it edits videos for the creator)
 - Under the music video, the user shoots multiple materials based on the same piece of music. Triller helps the creator identify the parts of the material that best match the rhythm, and automatically edit and stitch them together.



* Officially provide a co-production function (called "collaborate"), users can share their unfinished content on other platforms and invite friends or other creators to participate in the shooting



User feedback

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Positive reviews

- * Some **celebrities**, especially **musicians**, will use the platform to publish their works and share their social media videos, such as Selena Gomez and Kevin Hart.
- * **Bollywood themed music** is much loved in India.
- * After TikTok's security issues have been widely concerned, some users believe that **Triller from the United States will be a safer option**, and the overall **user experience** (post, share and watch videos) is similar to TikTok, and the two can be replaced by each other.

Voice of the user:

My sister found this app very useful as she was an active Tiktok user but she loves this app more than that. I'm having the best time of my life with this app, maybe because it suits me as an introvert, I enjoy the fact that I video myself being beautifully silly and others can watch and enjoy.

Negative reviews

- * Poor video play experience
 - In a good network environment, video play is still **stuck**, the buffer speed is **slow**, and the general clarity is low, which affects the user's video consumption
- * Content homogeneity is obvious, **lack of diversified content**
 - Mainly music/dance videos, lack of beauty, skincare, and fashion-related content that female users like
 - The content is mainly from European and American creators, **local content is limited**
 - The same video appears **repeatedly**

Voice of the user:

This app is overall good, but it is slow and also showing the same videos again.

- * Lots of local substitutes and low differentiation
 - On the whole, users have many local substitutes in India, and the media also tend to **recommend more local services**, such as **Mitron, Changari**
- * Editing features for creators have rooms for improvements
 - Creative editing tools are **difficult to use**, cannot be paused during shooting, and a large number of users report that they cannot upload videos successfully
 - Video duration, especially on music videos, currently **30s limit is generally unfriendly** (social video's duration can be up to 10 mins)
 - **No beauty function**

Voice of the user:

Video editing is very difficult. It would be helpful if I could pause the video while shooting. Also there is no beauty mode which is extremely required and also add some more effects.

We get 100 views but no likes no followers, million of views but not satisfied likes, this feature makes this app very disgusting

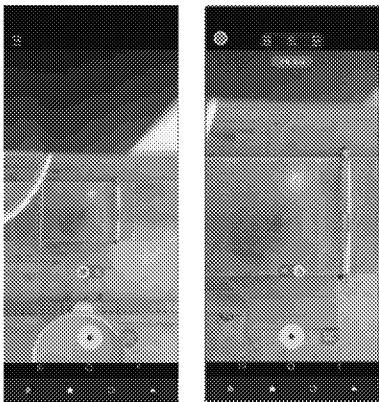
Youtube Shorts

For more information, please find [[HYPERLINK](#)

What is Shorts?

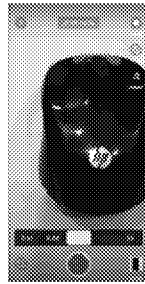
On 9/14, Youtube will test out beta of [[HYPERLINK "https://blog.youtube/news-and-events/building-youtube-shorts"](https://blog.youtube/news-and-events/building-youtube-shorts) \h] in India, starting from Android. More features will be added over time, and YouTube Shorts will expand to more countries in end of 2020.

Key features

Category	Description	Screenshots
Creator Experience	Camera * Create and upload videos of 15-seconds or less * The camera/recording page is very plain, with a recording button and the option of single person recording (zoom in camera) and multi person recording. There were no filters or special effects available yet * Other features	Selfie Camera have single person and multi person recording mode, enabling the front camera to zoom in 

(not available on beta yet but will be available when officially up):

- **Add music to videos** from YouTube's library. (YouTube Shorts will feature hundreds of thousands of tracks from partners like T-Series and Believe Digital. It's also working with music artists, labels and publishers to make more of their content available in YouTube Shorts' catalog)



- **Timers and countdowns**

Video Editing Page

* All filters available on the editing page are **color filters** (with limited special effects)

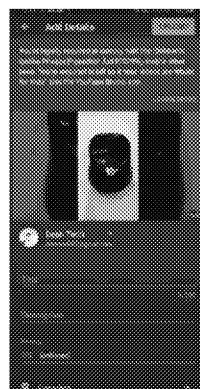
* **No option of adding stickers,** adding hashtag, or adding location, etc

* Other features (not available on beta yet but will be available when officially up):

- **stitch shorter clips together** with a multi-segment camera

[file_ 2020-09-09

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- **Speed up or slow down videos**

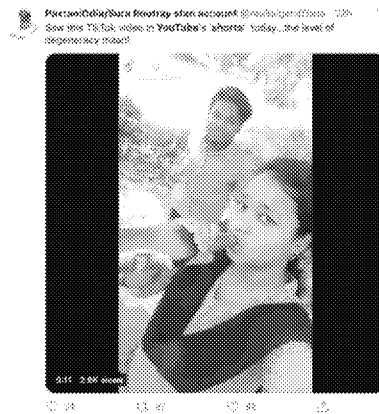
Entering the short page from YouTube home page	N/A
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N/A

- * The users can start creating videos by hitting the plus (+) icon (or soon, the video camera icon on iOS), then selecting “video.”
- * For Android users in India, however, you’ll see the “create” icon has been moved to the bottom of the navigation bar for easier access

Viewer
Experience

- * The content consumption feature will be similar to previous YouTube short-videos, the users can swipe through YouTube Shorts vertically — just like TikTok.



User feedback

Overall, Youtube Shorts gets **positive feedback early on in testing**, even though its great similarity to Tiktok. However, since it just launched beta and only in India, it did not spark great attention or excitement on a larger scale.

Appendix

全文点赞列表

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全文评论