

AMENDED Exhibit 402

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

Eric Han

1

1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA

3 -----x
4 IN RE: SOCIAL MEDIA ADOLESCENT) Case No. 4:22-md-
5 ADDITION/PERSONAL INJURY) 03047-YGR
6 PRODUCTS LIABILITY LITIGATION) MDL No. 3047
7 -----x

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF LOS ANGELES

10 UNLIMITED JURISDICTION

11 COORDINATION PROCEEDING) Judicial Council
12 SPECIAL TITLE [RULE 3.550]) Coordination
13) Proceeding
14) No. 5255
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24)
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CONTAINS HIGHLY CONFIDENTIAL INFORMATION

V O L U M E I

VIDEOTAPED DEPOSITION OF ERIC HAN

MARCH 11, 2025

9:21 A.M.

Job No.: 7150798

Pages: 1 - 430

Reported by: Leslie A. Todd, CSR No. 5129

1 MR. MATTERN: David Mattern on
2 behalf of the TikTok defendants.

3 MR. CHOW: Anden Chow on behalf
4 of Eric Han.

5 THE VIDEOGRAPHER: The court
6 reporter is Leslie Todd, and she will
7 now swear in the witness.

8 THE REPORTER: My name is
9 Leslie Todd. I am CSR 5129.

10 ERIC HAN,
11 and having been first duly sworn,
12 was examined and testified as follows:

13 EXAMINATION

14 BY MR. MURA:

15 Q. Good morning, Mr. Han.

16 A. Good morning.

17 Q. My name is Andre Mura, and I
18 represent the plaintiffs in this litigation.

19 We haven't met before today; is
20 that right?

21 A. That's right.

22 Q. Could you please state and
23 spell your full name for the record.

24 A. My name is Eric Han, spelled
25 E-R-I-C, H-A-N.

1 and not another, could you let me know that,
2 please?

3 A. Yes.

4 Q. Okay.

5 MR. MATTERN: I'm just going to
6 interpose an objection to treating
7 TikTok defendants in a collective
8 form. I understand your position on
9 it. But it's not really appropriate
10 to treat them as one group entity, and
11 if your question is -- if you want to
12 know about the different entities, you
13 should distinguish them.

14 MR. MURA: Okay.

15 Let's bring up tab 2, please,
16 which we'll mark as Exhibit 2.

17 (Exhibit No. 2 was marked for
18 identification.)

19 BY MR. MURA:

20 Q. Mr. Han, do you recognize this
21 document?

22 A. I do.

23 Q. Can you tell me what it is?

24 A. It appears to be my LinkedIn
25 page.

1 Q. Okay. Can you turn to page 2,
2 please.

3 A. Yes.

4 Q. It says here that you started
5 at TikTok in April 2019.

6 A. Yes.

7 Q. Is that accurate?

8 A. That is accurate.

9 Q. Okay.

10 MR. MURA: Evan, can you pull
11 up tab 3 and go to slide 2.

12 BY MR. MURA:

13 Q. Mr. Han, if I could ask you to
14 look at the screen. Does this slide
15 accurately reflect your start date at TikTok?

16 A. It does.

17 Q. And I'll hand you tab 3, which
18 we've marked as Exhibit 3, just so you have
19 it.

20 (Exhibit No. 3 was marked for
21 identification.)

22 MR. MURA: If we can go back to
23 tab 2, Evan.

24 BY MR. MURA:

25 Q. So according to your resume,

1 you were the United States head of safety for
2 TikTok; is that correct?

3 A. That's correct.

4 Q. Was that your role the entire
5 time you worked at TikTok?

6 A. Yes. Let me clarify. My last
7 few months there we moved into USDS, and I
8 was the head of safety there.

9 Q. Then you were the head of
10 safety at USDS?

11 A. Yes.

12 Q. And what is USDS?

13 A. USDS, as I remember, was the
14 entity to essentially split TikTok's -- and
15 I'm not a security person or data person --
16 but housed through data and security within
17 another entity.

18 Q. Okay. And it says here that
19 you worked for TikTok for four years and
20 three months. Does that sound accurate?

21 A. Correct.

22 Q. Okay. And you stopped working
23 at TikTok in June 2023?

24 A. Yes.

25 Q. Okay.

1 MR. MURA: Evan, can we please
2 return to tab 3. And slide 3.

3 BY MR. MURA:

4 Q. Mr. Han, if I could ask you to
5 look through the slide, does this accurately
6 reflect your end date at TikTok?

7 A. I seem to recall I technically
8 ended my end date like in the end of May, but
9 just -- just FYI, I forget what exact date.
10 But yes.

11 Q. Okay.

12 A. Yeah.

13 MR. MURA: So if we could
14 return to tab 2.

15 BY MR. MURA:

16 Q. So can you tell me a little bit
17 about your responsibilities as TikTok's head
18 of safety?

19 A. How it started and how it
20 evolved over time?

21 Q. Yes.

22 A. Great. I started as -- to
23 bring in the operational and policy element
24 for TikTok U.S. At the time trust and
25 safety, or what was known as GCDS at the

1 time, was centralized in Beijing, and TikTok
2 wanted to bring over a U.S.-focused trust and
3 safety team.

4 So my first few years there was
5 really establishing from the ground up,
6 hiring policy folks, operational folks, which
7 includes moderation, quality, training, other
8 teams like that, floating up strategy and
9 data teams and legal policy operation teams.

10 The next year after that was,
11 after building foundations around getting off
12 the ground and scaling, was more around
13 adding functions such as threat detection and
14 intelligence to try to get ahead of harms on
15 the platform, and then really collaborating
16 with our global partners across trust and
17 safety, whether that be our global trust and
18 safety team in Dublin or Southeast Asia.

19 And then my last year there
20 was, as noted, the transition to USDS. It
21 might have been more than a year of me
22 focusing on that, helping the company migrate
23 the entity over into USDS.

24 Q. When you started did you have
25 trainings?

1 A. What kind of training?

2 Q. To educate yourself about the
3 TikTok platform and how it works.

4 A. There is generally onboarding
5 within tech companies, so company culture,
6 ways of working, how to use the
7 infrastructure, things like that, yes.

8 Q. Okay. And over time did you
9 develop an understanding of how the platform
10 works?

11 A. Yes.

12 Q. And did you develop an
13 understanding of what features were available
14 on the platform?

15 A. Some features more than others
16 just by the nature of our work. I can't say
17 that I was an expert in the same way, for
18 example, a product manager would be across
19 the entire product service.

20 Q. Okay. And would those features
21 include safety features?

22 A. Yes.

23 Q. Did you develop an
24 understanding of how those features were
25 performing in the field?

1 A. I had a understanding, though
2 not a -- as in-depth as our safety product
3 team or what was known at the time as the
4 product and process team, which was a
5 separate team from ours.

6 Q. Okay. Did you develop an
7 understanding of the motivations behind the
8 platform's design?

9 A. Motivation. I believe I had an
10 understanding, yes.

11 Q. Okay. Did your role include
12 talking to the public about trust and safety?

13 A. The public meaning different
14 creators or just in general?

15 Q. You tell me.

16 A. Yeah, I talked to creators, and
17 sometimes NGOs, governments, and the media.

18 Q. Okay. And what does "trust and
19 safety" mean?

20 A. My definition of "trust and
21 safety"?

22 Q. Based on your work at TikTok.

23 A. Based on my work. Trust and
24 safety is generally the team to ensure that
25 any of what's in our community guidelines and

1 development of our community guidelines are
2 enforced in -- as accurately and as
3 efficiently as possible.

4 Q. Did you have a role in setting
5 those guidelines?

6 A. When I joined, there was
7 community guidelines already established.
8 When we started hiring policy folks, we
9 started looking at what needed to change and
10 evolve from there. And policy development is
11 a rolling evolution. So yes.

12 Q. Did you have the ability to
13 propose changes to the guidelines?

14 A. Yes.

15 Q. Did you have the ability to
16 propose different safety features?

17 A. I had the ability to suggest;
18 though that wasn't my team that held the
19 responsibility or the -- the power to do so.

20 Q. And when you made these types
21 of suggestions, who would you make them to?

22 A. For the first few years,
23 there -- and I'm sorry, I'm having trouble
24 recalling the names -- but it's -- there were
25 different leaders across product. I don't

1 tracking how many children were using TikTok
2 at night, and I believe your testimony was
3 you didn't recall whether there were such
4 metrics.

5 A. I don't recall.

6 Q. Do you have a sense of how much
7 sleep children need?

8 A. I don't have a sense.

9 MR. MURA: Can we bring up
10 tab 9, please.

11 (Exhibit No. 9 was marked for
12 identification.)

13 BY MR. MURA:

14 Q. So this is tab 9, which we're
15 marking as Exhibit 9.

16 A. (Peruses document.) Okay.

17 Q. Sir, what is this document?

18 A. It looks like a paper from a
19 journal.

20 Q. And as the head of safety, did
21 you ever review papers from journals?

22 A. Not myself personally, though I
23 know policy folk, sometimes operations,
24 product managers who had -- have access to
25 journals.

1 Q. And did you have access to
2 journals?

3 A. I can't be confident if I did.
4 I might -- I might have had a login to
5 LexisNexis, though I don't remember using it
6 often.

7 Q. And did the company ever store
8 journals?

9 A. I'm unsure.

10 Q. Okay. And this is titled
11 "Journal of Clinical Sleep Medicine"; is that
12 right?

13 A. Yes.

14 Q. And the title is "Recommended
15 Amount of Sleep for Pediatric Populations: A
16 Consensus Statement of the American Academy
17 of Sleep Medicine."

18 Do you see that?

19 A. I do.

20 Q. And do you see when this was
21 published? At the bottom.

22 A. 2016.

23 Q. 2016.

24 And do you see where it says
25 "Consensus recommendations"?

1 A. I do.

2 Q. And there's a bullet that
3 reads: "Teenagers 13 to 18 years of age
4 should sleep eight to ten hours per 24 hours
5 on a regular basis to promote optimal
6 health."

7 Do you see that?

8 A. I do.

9 Q. So according to this document,
10 there was a consensus of the American Academy
11 of Sleep Medicine in 2016 that teenagers
12 needed eight to ten hours of sleep; is that
13 right?

14 MR. MATTERN: Objection to
15 form.

16 THE WITNESS: It would appear
17 from this paper that that's their
18 consensus recommendation.

19 BY MR. MURA:

20 Q. And TikTok had data to track
21 teenagers' app usage; is that correct?

22 MR. CHOW: Objection.
23 Foundation.

24 THE WITNESS: Repeating the
25 question, if TikTok had data to track

1 yeah.

2 Q. And if you didn't read them,
3 would you discuss them with your colleagues?

4 A. If I didn't read them?

5 Q. Would they read them and
6 discuss them with you?

7 A. I don't recall a time where it
8 was brought up.

9 MR. MURA: Could we pull up tab
10 Han 16.

11 (Exhibit No. 17 was marked for
12 identification.)

13 MR. MURA: This is marked as
14 Exhibit 17.

15 BY MR. MURA:

16 Q. Mr. Han, do you see the URL at
17 the bottom?

18 A. I do.

19 Q. And that's the same URL we just
20 saw in the document that we were looking at;
21 is that correct?

22 A. Let's see. Yes.

23 Q. Okay. And it's the same title,
24 "Why we're making changes to Direct
25 Messaging," correct?

1 A. Yes.

2 Q. And this is a post authored by
3 Cormac Keenan, head of trust and safety.

4 A. Yes.

5 Q. Correct?

6 A. Correct.

7 Q. And you used to work with
8 Cormac Keenan?

9 A. Say that again.

10 Q. You used to work with Cormac
11 Keenan?

12 A. Yes.

13 Q. You used to report to him,
14 correct?

15 A. I had a dotted line to him in
16 my last year there.

17 Q. And what does dotted line mean?

18 A. Dotted line doesn't mean you're
19 reporting to someone, but it's somewhat of a
20 formal way to recognize that that's an
21 important relationship.

22 Q. Have you read this article
23 before?

24 A. I likely had at the time, but I
25 don't recall specifically.

1 Q. Okay. Can you turn to the
2 second page, please, looking at the bottom.
3 The language in italics.

4 A. Mm-hmm.

5 Q. Do you see where it says: "On
6 April 30, existing users and new users who do
7 not meet the age requirements to use Direct
8 Messaging will no longer have access to it"?

9 A. I do.

10 Q. And the date below that is 16
11 April 2020.

12 A. I do.

13 Q. Okay. So that would have been
14 April 30th of 2020, correct?

15 A. Correct.

16 MR. MURA: Can we pull up tab
17 Han 3, slide 7.

18 BY MR. MURA:

19 Q. Sir, does this slide accurately
20 reflect the date we just discussed when
21 TikTok limited direct messages to users 16 or
22 older?

23 MR. MATTERN: Objection to
24 form.

25 THE WITNESS: Oh, I see.

1 April 2020. Yes.

2 BY MR. MURA:

3 Q. Okay. So this feature was not
4 in place when you joined TikTok, correct?

5 A. Based on this slide and
6 document, correct.

7 Q. And it was not available when
8 TikTok launched in the U.S., correct?

9 A. Correct.

10 Q. Do you know when TikTok set
11 direct messages to off by default for 16- to
12 17-year-olds?

13 A. I do not.

14 MR. MURA: Can we pull up tab
15 Han 17, TikTok Newsroom.

16 We'll mark this as Exhibit 18.

17 (Exhibit No. 18 was marked for
18 identification.)

19 THE WITNESS: (Peruses
20 document.) Okay.

21 BY MR. MURA:

22 Q. Mr. Han, this is another
23 article from TikTok's Newsroom, correct?

24 A. Correct.

25 Q. Have you seen this article

1 work.

2 Q. So you don't recall whether a
3 teenager could unlink their account from a
4 family paired account?

5 A. I don't remember if there was a
6 mechanism.

7 Q. Do you recall whether a
8 teenager could simply go ahead and open up a
9 different TikTok account to evade Family
10 Pairing?

11 A. I believe that's -- yeah,
12 that's a scenario that can happen.

13 Q. Okay. And Family Pairing was
14 not mandatory; is that correct?

15 A. Correct.

16 MR. MURA: Can we pull up
17 tab 19. This is TIKTOK3047MDL-098-
18 04111887, which we are marking as
19 Exhibit 20.

20 (Exhibit No. 20 was marked for
21 identification.)

22 THE WITNESS: (Peruses
23 document.) Okay, I skimmed it.

24 BY MR. MURA:

25 Q. Okay. Are you ready?

1 A. Yes.

2 Q. Okay. What is this?

3 A. This seems like a -- I believe
4 a Lark conversation with [REDACTED] and I.

5 Q. Okay. This is a Lark
6 conversation between you and [REDACTED]
7 correct?

8 A. I believe so, yes.

9 Q. And this is from July 2021,
10 correct?

11 A. It looks like 2020 from the
12 timestamps.

13 Q. Okay. Correct. Sorry, July
14 2020.

15 And who is [REDACTED]

16 A. [REDACTED] was the head of
17 product and process for global trust and
18 safety.

19 Q. Okay. Do you see near the top
20 of the page ending in 898?

21 A. Ending 898.

22 Q. At 7/21/2021.

23 A. 7/21.

24 I'm only getting -- the first
25 page starts with 7/24. Yeah, the earliest

1 page I have is 7/24.

2 Oh, I see. I'm sorry. I got
3 it. Thank you.

4 Q. So this is a printout of a Lark
5 chat that starts in 2020, but it continues
6 into 2021; is that correct?

7 A. Correct.

8 Q. Okay. So we're looking at a
9 message from 7/21/2021, and you're the author
10 of that message, correct, at 12:41 a.m.?

11 A. Correct.

12 Q. And there you wrote: "From IG,
13 giving users more choice about what they see
14 regarding sensitive content."

15 Do you see that?

16 A. Yes.

17 Q. And then you have a link to an
18 article. Do you see that?

19 A. Yes.

20 Q. And then right below that

21 [REDACTED] responds: "I predict
22 approximately zero usage. Anything often
23 gets very low usage."

24 Do you see that?

25 A. I do.

1 it. I believe it was opt-out, though.

2 I'm sorry. I'm confusing my
3 language. It was not automatically
4 turned on when you joined the
5 platform.

6 BY MR. MURA:

7 Q. So it was opt-in; is that
8 correct?

9 A. Yes, it was opt-in.

10 MR. MURA: Okay. Let's look at
11 tab 23.

12 This is TIKTOK3047MDL-004-
13 00144763. It's Exhibit 25.

14 (Exhibit No. 25 was marked for
15 identification.)

16 THE WITNESS: (Peruses
17 document.) Okay.

18 BY MR. MURA:

19 Q. Do you recognize this document?

20 A. I don't recognize this
21 document, but I recognize some names and
22 terms in it.

23 Q. Okay. Do you see that the
24 metadata of this file indicates that you
25 authored it in April of 2020?

1 A. I do.

2 Q. Do you have any reason to doubt
3 that?

4 A. No.

5 Q. Do you see at the top where it
6 says "Rabbit holes -- no doubt about it; it
7 will happen"?

8 A. Yes.

9 Q. And then it goes on: "You can
10 burn a half hour very easily; find yourself
11 in a very bizarre mode (part of the
12 psychological wellness) -- trying to figure
13 out how to incentivize this while also
14 acknowledging business goals."

15 A. I do.

16 Q. What is a rabbit hole?

17 A. A rabbit hole is where -- what
18 we referred to as -- some call it digital
19 cul-de-sacs, some call it filter bubbles.

20 THE REPORTER: Some call it
21 what? I'm sorry.

22 MR. CHOW: Cul-de-sacs.

23 THE WITNESS: Yeah,
24 cul-de-sacs.

25 THE REPORTER: Start over

1 again. Some call it?

2 THE WITNESS: Cul-de-sacs, some
3 call it filter bubbles, when you get
4 put into a product experience that's
5 focused on one type of content or one
6 topic of related content.

7 BY MR. MURA:

8 Q. So a rabbit hole occurs when
9 the algorithm gets stuck showing a user the
10 same type of content over and over again. Is
11 that right?

12 A. More or less, yes.

13 Q. Okay. And that content could
14 sometimes be harmful to the user, correct?

15 MR. MATTERN: Objection to
16 form.

17 THE WITNESS: There were
18 acknowledgements that, yes, there were
19 areas that we would want to disperse
20 certain rabbit holes that would
21 potentially violate our policies.

22 BY MR. MURA:

23 Q. And based on this document, you
24 were aware that rabbit holes were a problem
25 on TikTok in April 2020, correct?

1 mind they were notes from our Content
2 Advisory Council, it wasn't so much a
3 -- TikTok can do this, but the concept
4 of which that we should be concerned
5 about.

6 BY MR. MURA:

7 Q. Okay. You should be concerned
8 about rabbit holes, you're saying?

9 A. Yeah, in general -- in general,
10 yes.

11 Q. Okay. Because rabbit holes can
12 cause body image issues; is that correct?

13 A. That's something that we wanted
14 to investigate.

15 Q. And rabbit holes was something
16 that occurred on TikTok, correct?

17 A. I don't remember when [REDACTED]
18 [REDACTED] team started taking a look at
19 validating that with data. And that's
20 something he would -- he would know.

21 Q. Okay. Well, the top of the
22 document says "Rabbit Holes - No Doubt About
23 It. It Will Happen." Correct?

24 A. Yes.

25 Q. Back on page 1, do you see

1 where it says: "Real contagion effect.
2 Suicidal ideation and behavior, and the way
3 that it is talked about on the platform."

4 Do you see that?

5 A. I do.

6 Q. Is your understanding of this
7 that TikTok rabbit holes may create a
8 contagion effect spreading suicidal ideation
9 and behavior on the app?

10 MR. CHOW: Objection. Form.

11 THE WITNESS: I think, again,
12 based on the notes and talking to the
13 council, it was more highlighting what
14 can be possible and getting ahead of
15 it.

16 BY MR. MURA:

17 Q. So this document is
18 highlighting that TikTok rabbit holes can
19 create a contagion effect related to suicide
20 ideation, correct?

21 MR. CHOW: Objection. Form.

22 THE WITNESS: I think again,
23 based on the notes in the context of
24 the document, it was more of an
25 acknowledgment that because we have

1 community guidelines to prevent
2 exploitation on the platform, it is
3 our job to make sure that we're
4 investigating it.

5 BY MR. MURA:

6 Q. But you have community
7 guidelines to prevent something, correct?

8 A. Yes.

9 Q. And you have guidelines to
10 prevent something because it's happening,
11 correct?

12 A. There's an acknowledgment that
13 the world will -- or people would want to
14 exploit it, correct.

15 Q. And this statement is
16 acknowledging that there's a real contagion
17 effect with respect to rabbit holes that may
18 create suicidal ideation, correct?

19 MR. CHOW: Objection. Form.

20 THE WITNESS: The -- the part
21 where I'm trying to be very clear on,
22 is that when we're talking to our
23 Content Advisory Council, because
24 they're academics, NGOs, advocates,
25 et cetera, we often talked about these

1 concepts across the internet versus,
2 Hey, what's actually happening at
3 TikTok in the moment. They wouldn't
4 know that because they're external
5 council, and I think that -- that's
6 important within the context of the
7 notes.

8 MR. MURA: Okay. I'll move to
9 strike the answer as nonresponsive.

10 BY MR. MURA:

11 Q. Sir, I'm asking you a question
12 about this document.

13 A. Yes.

14 Q. This document is acknowledging
15 that there's a real contagion effect with
16 respect to rabbit holes that may create
17 suicidal ideation, correct?

18 MR. CHOW: Objection. Form.

19 THE WITNESS: There is
20 conversation and possibility about
21 rabbit holes across the internet.

22 Yes, we were talking about that.

23 BY MR. MURA:

24 Q. And that's what the document is
25 saying, correct?

1 from a product perspective, which I
2 know many folks on [REDACTED]
3 team was -- was trying to prioritize.

4 BY MR. MURA:

5 Q. And is that the design change
6 that was being discussed with the Wall Street
7 Journal?

8 A. Just based on the sentence, it
9 seems they're referring to content
10 classification.

11 MR. MURA: Okay. Can we pull
12 up tab 26.

13 This is TIKTOK3047MDL-060-
14 01110548. It's Exhibit 28.

15 (Exhibit No. 28 was marked for
16 identification.)

17 THE WITNESS: (Peruses
18 document.) Okay.

19 BY MR. MURA:

20 Q. Have you seen this document
21 before?

22 A. Based on its content, I likely
23 have, though I don't have a strong memory of
24 it.

25 Q. And this document was found in

1 your files. Do you have any reason to
2 dispute that?

3 A. It looks like the author was
4 [REDACTED] who ran incident management,
5 and this was postmortem. So it makes sense.

6 Q. And you were the custodian,
7 correct?

8 A. Correct.

9 Q. And you worked on the Wall
10 Street Journal algorithm investigation
11 response, correct?

12 A. Response to --

13 Q. The response to this article.

14 MR. CHOW: Objection. Form.

15 THE WITNESS: I helped lead and
16 manage how to actually address the
17 problems that we saw.

18 BY MR. MURA:

19 Q. I'll -- I'll ask it again. Did
20 you work on the response to the Wall Street
21 Journal article?

22 MR. CHOW: Objection. Form.

23 THE WITNESS: Just to be
24 specific about it, like the actual
25 solutions or working with folks

1 internally?

2 BY MR. MURA:

3 Q. As head of safety, did you work
4 on -- on a response in terms -- in terms of
5 safety to the problems that the Wall Street
6 Journal had identified in its article?

7 MR. CHOW: Objection. Form.

8 THE WITNESS: I will describe
9 my role in it. My role was from a
10 leadership perspective encouraging
11 leaders across trust and safety teams,
12 TikTok helping manage what the problem
13 was, and then deferring to our product
14 engineering, other leaders that were
15 building it from there.

16 BY MR. MURA:

17 Q. Okay. Do you see the title
18 "Postmortem"?

19 A. I do.

20 Q. "Wall Street Journal Algorithm
21 Investigation"?

22 A. Yes.

23 Q. Do you see where it says: "The
24 Wall Street Journal ran a series of bot
25 TikTok accounts to investigate TikTok's AI

1 and For You feed with a particular interest
2 in our approach to minor safety."

3 A. Yes.

4 Q. And this is referencing the
5 stories that the Wall Street Journal ran,
6 correct?

7 A. Yes.

8 Q. And those stories were
9 discussing how children could fall into
10 negative rabbit holes on TikTok, correct?

11 MR. CHOW: Objection. Form.

12 THE WITNESS: From my memory,
13 yes.

14 BY MR. MURA:

15 Q. It goes on: "About a dozen of
16 the Journal's 31 minor accounts ended up
17 being dominated by a particular theme. Even
18 when the Journal's accounts were programmed
19 to express interest in multiple topics,
20 TikTok sometimes zeroed in on single topics
21 and served them hundreds of videos, about one
22 in close succession."

23 Do you see that?

24 A. I do.

25 Q. And do you see where it says

1 "Wall Street Journal published two stories
2 regarding their experiment"?

3 A. I do.

4 Q. On page -- on the next page or
5 the page ending in 554, do you see where it
6 says "Business Impact"?

7 A. I do.

8 Q. And it says: "Why do we need
9 to solve this problem from a trust and safety
10 perspective?"

11 Do you see that?

12 A. I do.

13 Q. And it says: "Gaps in our
14 product protections for minors can
15 particularly have downstream reputational and
16 revenue impact."

17 Do you see that?

18 A. I do.

19 Q. Then it goes on: "For example,
20 one Wall Street Journal article has put
21 approximately 20 to \$30 million of revenue
22 over the next 12 months at risk."

23 Do you see that?

24 A. I do.

25 Q. And then a little later under

1 the hyperlink, it says: "Our business
2 partners hold us to high standards on user
3 safety and issues uncovered by the Wall
4 Street Journal's investigation, pose
5 significant risks to the TikTok brands,
6 impacting user growth."

7 Do you see that?

8 A. I do.

9 Q. At the bottom of the next page,
10 do you see where it says "Current Team"?

11 A. Yes. Yep.

12 Q. And then underneath that it
13 says "algo"?

14 A. Yes.

15 Q. And on the right-hand side
16 there's a column "Proposed Projects and
17 Comments." Do you see that?

18 A. Yes.

19 Q. And across from algo, it says:
20 "Dedicated resources on filter bubbles as
21 filter bubble projects were deprioritized in
22 2020."

23 Do you see that?

24 A. Yes.

25 Q. And that's consistent with your

1 testimony today?

2 MR. CHOW: Objection to form.

3 MR. MATTERN: Objection to
4 form.

5 THE WITNESS: That is -- my
6 memory of this is in reference, as I
7 already said, which was we presented
8 filter bubble work that we were doing
9 manually to [REDACTED] but it
10 wasn't prioritized at the time.

11 BY MR. MURA:

12 Q. So this is referring to the
13 deprioritization of resources on filter
14 bubbles, correct?

15 A. It is -- it says it in the
16 statement, though I can't be a hundred
17 percent sure, that was referencing my
18 conversation with [REDACTED]

19 Q. Okay. So you don't know if
20 this was referencing your conversation?

21 A. Right.

22 Q. Okay. Do you know if other
23 employees of TikTok had also raised these
24 concerns?

25 A. I can't be sure if other folks

1 did, but other folks were involved in -- when
2 we were looking into it.

3 Q. Were other members of your team
4 also concerned that filter bubble projects
5 had been deprioritized?

6 A. The core --

7 MR. CHOW: Objection. Form.

8 THE WITNESS: When we look at
9 any problem, it involves policy
10 operations, data, et cetera, so that
11 project team was likely involved and
12 aware.

13 BY MR. MURA:

14 Q. And do you recall if they were
15 also concerned?

16 A. As noted, we were always
17 concerned.

18 Q. And were you concerned with
19 this specific issue?

20 A. Yes, we were.

21 MR. MURA: Can we pull up tab
22 27. This is Exhibit 29. It's
23 TIKTOK3047MDL-038-LARK-00188509.

24 (Exhibit No. 29 was marked for
25 identification.)

1 A. Yes.

2 MR. MURA: Okay. Can we pull
3 up tab 28, please.

4 This is Exhibit 30, and it's
5 TIKTOK3047MDL-004-00144753.

6 (Exhibit No. 30 was marked for
7 identification.)

8 THE WITNESS: (Peruses
9 document.) Okay.

10 BY MR. MURA:

11 Q. What is this document?

12 A. Based on the title, "Minor
13 Safety Policy Annual Review."

14 Q. Have you seen it before?

15 A. This is not ringing a bell, no.

16 Q. I'll represent to you that this
17 document came from your files. Do you have
18 any reason to doubt that?

19 A. I see it came from my files,
20 and it also says I'm the author, which I'm
21 confused about. I generally would recognize
22 the document, but a lot of this is new to me.
23 But it might ring a bell as we talk about it.

24 Q. Okay. But you're identified as
25 an author, correct?

1 A. Correct.

2 Q. And the date of the document is
3 February 2020; is that right?

4 A. Right.

5 Q. The document is titled "Minor
6 Safety Policy Annual Review (2020)."
7 Correct?

8 A. Yes.

9 Q. And do you see "Assumptions of
10 Minor Safety"?

11 A. I do.

12 Q. The first bullet point says:
13 "Minor Safety is an urgent issue that we must
14 address effectively."

15 Do you see that?

16 A. I do.

17 Q. "We need to be more creative in
18 terms of minor safety."

19 Correct?

20 A. I see that.

21 Q. "Minor users are a protected
22 group."

23 A. I see that.

24 Q. "Social media is inherently
25 dangerous, and all minors are at risk when

1 they engage on the platform."

2 A. I see that.

3 Q. To your knowledge, did TikTok
4 ever tell parents that social media is
5 inherently dangerous?

6 MR. MATTERN: Objection to
7 form.

8 THE WITNESS: I don't know if
9 they addressed that specifically,
10 though I know the comms team had
11 Newsroom articles, as we've seen.

12 BY MR. MURA:

13 Q. To your knowledge, did TikTok
14 ever tell parents that all minors are at risk
15 when they engage on the platform?

16 MR. CHOW: Objection. Form.

17 THE WITNESS: I don't recall.

18 I don't believe so.

19 BY MR. MURA:

20 Q. Do you agree that minor safety
21 is an urgent issue that TikTok must address
22 effectively?

23 A. Do I believe it now or when
24 this document was created?

25 Q. When this document was created.

1 THE WITNESS: I assume if [REDACTED]
2 is an employee, then I would assume
3 so.

4 BY MR. MURA:

5 Q. And you recognize the
6 stakeholder?

7 A. I recognize Sean Kim, yes.

8 Q. And he was an employee, right?

9 A. Yes.

10 Q. And what was his role?

11 A. He was, if I recall correctly,
12 the head of U.S. products.

13 MR. MURA: Can we turn to tab
14 31 -- oh, 33, my apologies.

15 This is Exhibit 35.

16 (Exhibit No. 35 was marked for
17 identification.)

18 THE WITNESS: (Peruses
19 document.) Okay.

20 BY MR. MURA:

21 Q. Do you recognize this article,
22 sir?

23 A. I do.

24 Q. What is it?

25 A. It was a -- comms team asked if

1 I would be willing to participate talking
2 about how I manage my time and prioritize my
3 well-being, things like that.

4 Q. Is the comms team the
5 communications team?

6 A. Yes.

7 Q. And that's the communications
8 team at TikTok?

9 A. Yes. To clarify, I forget who,
10 I think it might be CNBC, they reached out to
11 the comms team, I believe.

12 Q. Okay.

13 A. Yeah.

14 Q. And they asked you to speak on
15 this article?

16 A. My comms team did, yes.

17 Q. Okay. So you spoke -- you gave
18 this interview with TikTok's blessing. Is
19 that fair to say?

20 A. Yes.

21 Q. Okay. And this article was
22 published in July of 2022?

23 A. Yes.

24 Q. And it's by CNBC?

25 A. I think so. From my

1 recollection -- yeah, I see CNBC.

2 Q. Okay. And the title of the
3 article is "How TikTok's head of U.S. safety
4 still finds a way to log off social media
5 while on vacation."

6 A. Yes.

7 Q. Do you see that?

8 A. Yes.

9 Q. And that's a picture of you --

10 A. Yes.

11 Q. -- there?

12 A. Yes.

13 Q. And presumably your dog?

14 A. Yes.

15 Q. And you supplied this photo,
16 right?

17 A. I did.

18 Q. It's a very nice photo.

19 A. Thank you.

20 Q. And so you participated in the
21 creation of this story, right?

22 A. I participated in being
23 interviewed, yes.

24 Q. Okay.

25 A. Yep.

1 Q. Do you see on the third page
2 where it says, "Tips to stop checking social
3 media on vacation"?

4 A. Yes.

5 Q. And the article quotes you as
6 saying: "I've used an app called Freedom
7 that limits my access to certain sites and
8 apps."

9 Do you see that?

10 A. Yes.

11 Q. "Other times I'll just delete
12 social media, like Reddit, Twitter,
13 Instagram, and TikTok off my phone."

14 Do you see that?

15 A. Yes.

16 Q. "The challenge is always
17 sticking to it."

18 Do you see that?

19 A. I do.

20 Q. What is this Freedom app?

21 A. I don't know if it's still
22 around, but it was essentially time limits on
23 your -- on apps that you don't want to
24 access.

25 Q. So this was an independent app

1 that you would download?

2 A. Yes.

3 Q. And you would use this download
4 to help limit your access to an app like
5 TikTok; is that right?

6 A. Yes.

7 Q. Alternatively, you would delete
8 TikTok from your phone, correct?

9 A. Yes.

10 Q. And that was sort of how you
11 handled the challenge of sort of being
12 inundated by social media. Is that fair?

13 MR. MATTERN: Objection to
14 form.

15 MR. CHOW: Objection.

16 THE WITNESS: I wouldn't
17 categorize it inundation. I think
18 this is me and it speaks to my trip to
19 Malaysia, and this is obviously very
20 personal, but seeing where my grandpa
21 and grandma grew up, where they passed
22 away, and wanting to feel like -- to
23 be there present with my parents
24 because it was a very emotional
25 moment. So, yeah, it was just about

1 being present.

2 BY MR. MURA:

3 Q. Well, I'm very sorry to hear
4 about that, your loss.

5 A. Thank you.

6 Q. Did you use this app at other
7 times?

8 A. Sometimes I would use it. And
9 I use another app now, actually, the -- when
10 I want to focus on something. So whether
11 that is I really want to get work done or I
12 want to focus if I'm playing music with my
13 wife, we oftentimes turn it off for -- just
14 to make sure that we're being present with
15 each other.

16 Q. Okay. Does your wife also use
17 it?

18 A. No.

19 Q. Have you ever recommended this
20 app to friends?

21 A. I've recommended it to my
22 friend who was having trouble focusing on his
23 work, but that was mostly to block out news
24 apps.

25 MR. MURA: Okay. Can we pull

1 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

2 The undersigned Certified Shorthand Reporter
3 does hereby certify:

4 That the foregoing proceeding was taken before
5 me at the place and time therein set forth, at
6 which time the witness was duly sworn; That the
7 testimony of the witness and all objections made at
8 the time of the examination were recorded
9 stenographically by me and were thereafter
10 transcribed, said transcript being a true and
11 correct copy of my shorthand notes thereof; That
12 the dismantling of the original transcript will
13 void the reporter's certificate.

14 In witness thereof, I have subscribed my name
15 this date: March 22, 2025.

16 <%14542,Signature%>
17 _____

18 LESLIE A. TODD, CSR, RPR

19 Certificate No. 5129
20

21 (The foregoing certification of
22 this transcript does not apply to any
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24 unless under the direct control and/or
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Exhibit 402B

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

Eric Han

431

1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA

3 -----X
4 IN RE: SOCIAL MEDIA ADOLESCENT) Case No. 4:22-md-
5 ADDITION/PERSONAL INJURY) 03047-YGR
6 PRODUCTS LIABILITY LITIGATION) MDL No. 3047
7 -----X

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 FOR THE COUNTY OF LOS ANGELES

10 UNLIMITED JURISDICTION

11 COORDINATION PROCEEDING) Judicial Council
12 SPECIAL TITLE [RULE 3.550]) Coordination
13) Proceeding
14) No. 5255
15)
16)
17)
18)
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21)
22)
23)
24)
25)

CONTAINS HIGHLY CONFIDENTIAL INFORMATION

V O L U M E I I

VIDEOTAPED DEPOSITION OF ERIC HAN

MARCH 12, 2025

9:07 A.M.

Job No.: 7150808

Pages: 431 - 635

Reported by: Leslie A. Todd, CSR No. 5129

1 that I sent to somebody.

2 Q. And this is a Lark message that
3 you sent on June 18th, 2019?

4 A. Yes.

5 Q. And I'll represent to you that
6 it was produced from your files. Any reason
7 to dispute that?

8 A. No.

9 Q. Do you see the second sentence
10 that starts "We still"?

11 A. Yes.

12 Q. And there it says: "We still
13 have the under-13 version of the app, though
14 anecdotally we're still seeing quite a few
15 kids slipping through the caps -- the cracks,
16 which makes sense since an age gate is easy
17 to circumvent."

18 Did I read that correctly?

19 A. Yes.

20 MR. MURA: Can we turn to tab
21 62. This is TIKTOK3047MDL-183-LARK-
22 08031400, and it's Exhibit 58.

23 (Exhibit No. 58 was marked for
24 identification.)

25 THE WITNESS: (Peruses

1 document.) Okay.

2 BY MR. MURA:

3 Q. Sir, what is this document?

4 A. It looks like it's a Lark chat
5 or Lark group with our global trust and
6 safety team and myself.

7 Q. And it's from August 2021; is
8 that right?

9 A. That's right.

10 Q. And the Lark chat is titled
11 "T&S Offsite 2021, Learning Day Context and
12 Conditions."

13 A. Yes.

14 Q. And I'll represent that it came
15 from your files. Any reason to dispute that?

16 A. No.

17 Q. Any reason to believe it was
18 altered in any way?

19 A. No.

20 Q. Do you see the last message on
21 the last page, on 8/27/2021, 16:02?

22 A. Yes.

23 Q. And you write: "I have to hop
24 off for other calls, but thanks for the
25 invite. Super informative. Looking forward

1 to more next week."

2 A. Yes.

3 Q. And at the very bottom of the
4 page ending in 44 and the top of the page
5 ending in 45, do you see where [REDACTED]
6 posts?

7 A. Ending 44 and 45. I do see it,
8 yeah.

9 Q. And [REDACTED] is another
10 member of trust and safety; is that right?

11 A. He's the head of product and
12 process.

13 Q. Head of product and process?

14 A. Yes.

15 Q. So the head of product and
16 process writes: "We don't yet have great
17 measurements of minor safety."

18 Do you see that?

19 A. I do.

20 Q. And then he goes on to say,
21 towards the middle of the paragraph: "We've
22 heard your feedback about measuring real
23 world harm for both children and adults, and
24 we're going to develop a measurement of that
25 in this by month."

1 Do you see that?

2 A. I do.

3 Q. And he goes on to say: "We're
4 still figuring out the best way to do this
5 and would welcome thoughts or things we
6 should learn from Douyin."

7 Do you see that?

8 A. I do.

9 Q. What is Douyin?

10 A. Douyin is the Chinese version
11 of TikTok.

12 Q. Would the teams regularly look
13 to Douyin to learn about their features?

14 MR. MATTERN: Objection to
15 form.

16 THE WITNESS: From my
17 experience, not so much from my team,
18 though I have heard other folks,
19 especially on product, that were more
20 closely engrained with the product
21 teams say things like this, but not
22 too frequently.

23 BY MR. MURA:

24 Q. When you say that Douyin is the
25 Chinese version of TikTok, it's owned by

1 ByteDance, correct?

2 A. I don't exactly remember the --
3 the reporting lines or who owns what, though
4 I do think it is a ByteDance product.

5 Q. It's a ByteDance product,
6 right?

7 A. Yes.

8 Q. Just like TikTok, right?

9 MR. CHOW: Objection. Form.

10 THE WITNESS: Again, I -- I
11 don't know what the -- I know
12 there's -- how it's set up, I'm not
13 sure what the ownership structure is
14 all the time.

15 MR. MURA: Okay. Let's turn to
16 tab 61. This is Exhibit 59.

17 (Exhibit No. 59 was marked for
18 identification.)

19 THE WITNESS: (Peruses
20 document.) Okay.

21 BY MR. MURA:

22 Q. What is this document?

23 A. This look like -- looks like
24 it's a Lark group where I believe it was an
25 automated bot that would produce stories

1 related to TikTok and ByteDance.

2 Q. And this Lark chat is titled
3 "Global News Updates"; is that right?

4 A. Yes.

5 Q. And it's from October of 2021;
6 is that right?

7 A. Yes.

8 Q. And I'll represent to you that
9 this came from your files. Do you have any
10 reason to doubt that?

11 A. No.

12 Q. Turn to the page ending in 402.

13 A. Okay.

14 Q. Do you see where it says "Post:
15 Title: Text," it's from 2021-10-23?

16 A. Yes.

17 Q. What is this Lark message
18 discussing?

19 A. This looks like an example of
20 what I believe was an automated newsbot that
21 collected news from around the world around
22 ByteDance or TikTok.

23 Q. Okay. Can you read the third
24 bullet, please.

25 A. China -- Number 3, "China

1 neutral Douyin launches mandatory five-second
2 pauses in videos feed to cure user
3 addiction."

4 Q. So this is reporting that
5 Douyin launched a mandatory five-second pause
6 in video to curb user addiction; is that
7 right?

8 MR. MATTERN: Objection to
9 form.

10 THE WITNESS: It seems like it
11 based on the title.

12 BY MR. MURA:

13 Q. And that we established was a
14 product of ByteDance; is that right?

15 A. I believe so.

16 Q. The Chinese version of TikTok?

17 MR. MATTERN: Objection to
18 form.

19 THE WITNESS: I believe so,
20 yes.

21 BY MR. MURA:

22 Q. Were you aware that Douyin had
23 launched mandatory five-second pauses for its
24 users to curb addiction?

25 MR. MATTERN: Objection to

1 form.

2 THE WITNESS: I don't recall
3 the exact details there, but I -- I do
4 remember there -- of course, and China
5 is a different regulatory environment
6 from elsewhere, so perhaps their
7 features or attention was different
8 from other parts of the globe.

9 BY MR. MURA:

10 Q. And when you say "different
11 regulatory environment," are you saying that
12 they were more attentive to curbing
13 addiction?

14 MR. MATTERN: Objection to
15 form.

16 THE WITNESS: No. More in my
17 experience, and this is what I
18 mentioned within the 2018 policies,
19 there were more strict guidelines.
20 For example, you can't critique a
21 government or kingdom, things like
22 that.

23 So just speaking to my
24 experience, I can see why there were
25 sometimes different strategies between

1 China and the rest of the world.

2 BY MR. MURA:

3 Q. But this is not talking about
4 regulations, right?

5 MR. MATTERN: Objection to
6 form.

7 THE WITNESS: I don't recall
8 this exact feature. I'm just speaking
9 to my experience.

10 BY MR. MURA:

11 Q. Okay. But this document is
12 just reporting that Douyin launches mandatory
13 five-second pauses in video feed to curb user
14 addiction, correct?

15 MR. MATTERN: Objection to
16 form.

17 THE WITNESS: Based on the
18 title, yes.

19 BY MR. MURA:

20 Q. Okay. To your knowledge, did
21 TikTok ever adopt mandatory five-second
22 pauses in video feeds to curb user addiction?

23 MR. MATTERN: Objection to
24 form.

25 THE WITNESS: I don't recall a

1 feature like that.

2 BY MR. MURA:

3 Q. Are you aware of anything in
4 the United States regulatory environment that
5 would prohibit TikTok from launching
6 mandatory five-second pauses in video feeds
7 to curb user addiction?

8 MR. MATTERN: Objection to
9 form.

10 THE WITNESS: I'm not aware.

11 BY MR. MURA:

12 Q. I just have a few more
13 questions for you, Mr. Han.

14 What was your salary the last
15 year that you worked at TikTok?

16 A. I don't remember the exact
17 number. I think it might have been [REDACTED]
18 [REDACTED] a year, but I could be wrong.

19 Q. And was that just salary or did
20 that include bonus?

21 A. It included bonus. Bonus was
22 dependent on rating and different factors, so
23 bonus changed year over year.

24 Q. And do you remember what your
25 bonus was the last year?

1 CERTIFICATE

2 I, CARRIE A. CAMPBELL, Registered
3 Diplomate Reporter, Certified Realtime
4 Reporter and Certified Shorthand Reporter, do
5 hereby certify that prior to the commencement
6 of the examination, Eric Han, was duly sworn
7 by me to testify to the truth, the whole
8 truth and nothing but the truth.

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

15 I DO FURTHER CERTIFY that I am
16 neither a relative nor employee nor attorney
17 nor counsel of any of the parties to this
18 action, and that I am neither a relative nor
19 employee of such attorney or counsel, and
20 that I am not financially interested in the
21 action.

22 <%31964,Signature%>

23 CARRIE A. CAMPBELL,
24 NCRA Registered Diplomate Reporter
25 Certified Realtime Reporter
California Certified Shorthand
Reporter #13921
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Dated: July 1, 2025