

AMENDED Exhibit 404

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

Natalie Medoff

1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No.

IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

This Document Relates To:

ALL ACTIONS

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
UNLIMITED JURISDICTION

Coordination Proceeding Judicial Council
Special Title Coordination Proceeding
(Rule 3.550 No. 5255

SOCIAL MEDIA CASES

This Document Relates To:

Judge: Carolyn B. Kuhl
Dept. 12

ALL ACTIONS

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF

NATALIE MEDOFF

Held At: Hilton Santa Monica Hotel & Suites
1707 4th Street
Santa Monica, California

May 20th, 2025
9:06 a.m.

Reported Remotely By:

1 Spaulding, on behalf of the TikTok
2 defendants.

3 THE VIDEOGRAPHER: The court
4 reporter is Maureen Pollard. Her
5 California CSR number is 14449. And she
6 will now swear in the witness.

7 * * *

8 Whereupon,

9 NATALIE MEDOFF,
10 being first duly sworn to testify to the truth,
11 the whole truth, and nothing but the truth, was
12 examined and testified as follows:

13 EXAMINATION

14 BY MR. KLAUSNER:

15 Q. Good morning, Ms. Medoff. How are
16 you doing?

17 A. Doing pretty good. How are you?

18 Q. Great.

19 I understand this is your first
20 deposition.

21 A. Mm-hmm.

22 Q. Okay. So typically the way we start
23 things off is we go over some rules of the road,
24 sometimes called admonitions, just an
25 explanation of how things are going to go today

1 will cause you to be named as a defendant in
2 this case?

3 A. I do.

4 Q. Okay. You're not going to be held
5 personally liable for any of the alleged harms
6 that TikTok may have committed, correct?

7 A. Yes.

8 Q. You understand that?

9 A. I do.

10 Q. Okay. You're not at risk of that --

11 A. That's a good understanding.

12 Q. Okay. Just want to make sure that's
13 clear.

14 A. Mm-hmm.

15 Q. Okay. I want to go over a couple of
16 preliminary matters before we get into some of
17 your actual substantive work at TikTok.

18 I'm going to hand you a document.
19 I've written Exhibit 1 at the top.

20 (Whereupon, TikTok-Medoff-1 was
21 marked for identification.)

22 BY MR. KLAUSNER:

23 Q. And I will represent to you that
24 this is a work history that was provided to us
25 by lawyers from TikTok.

1 Do you understand that?

2 A. Yes.

3 Q. Okay. Can you take a minute and
4 look at that and let me know if that looks
5 accurate to you?

6 A. It does.

7 Q. Okay. So my understanding is you
8 started work at TikTok in September of 2020,
9 correct?

10 A. Yes.

11 Q. And then you stopped working in
12 November of 2024?

13 A. Yes.

14 Q. November 23rd, correct?

15 A. Correct.

16 Q. And that's about a week before
17 Thanksgiving?

18 A. Yes.

19 Q. Okay. What was your job title when
20 you started working at TikTok in September of
21 2020?

22 A. P&P issue program manager. Program
23 manager is probably fine.

24 Q. I'm sorry, what does "PMP issue"
25 mean?

1 A. Product and process.

2 Q. Oh, P&P?

3 A. P&P, yeah. And then issue was like
4 the specific issue area for minor safety.

5 Q. I'm sorry, the word "issue"
6 represents minor safety in this context?

7 A. Yeah. Like there's different -- you
8 know, there was different pillars of trust and
9 safety that were referred to as "issues," and so
10 ours was minor safety.

11 MR. KLAUSNER: I'm sorry, I'm not
12 getting -- is there a real-time that we
13 can look at?

14 MS. FOURNIER: You have to pull it
15 up within your -- there's a link in the
16 Zoom that it can pull up on your laptop.

17 MR. KLAUSNER: Thank you.

18 Maureen, can I have the last
19 substantive question and answer read back,
20 please?

21 (Whereupon, the reporter read back
22 the following:

23 "QUESTION: I'm sorry, the word
24 "issue" represents minor safety in this
25 context?

1 ANSWER: Yeah. Like there's
2 different -- you know, there was different
3 pillars of trust and safety that were
4 referred to as "issues," and so ours was
5 minor safety.")

6 BY MR. KLAUSNER:

7 Q. And so you mentioned trust and
8 safety. Is trust and safety a department that
9 you worked within?

10 A. Yes.

11 Q. Okay. And when you began work in
12 September of 2020 under the umbrella of trust
13 and safety, who did you report to directly?

14 A. Amy Classen.

15 Q. And what was her role there at the
16 time?

17 A. She was -- what was the title? She
18 was issue lead. GIO was what they called it,
19 global something-something. I don't remember
20 what it stands for. Global issue owner. There
21 we go.

22 Q. And the issue of which she was the
23 global owner was minor safety?

24 A. Correct.

25 Q. That was her issue?

1 A. Yes.

2 Q. And she was responsible for that?

3 A. Correct.

4 Q. And did you work directly under her?

5 A. Yes.

6 Q. Okay. And do you know who she

7 reported directly to?

8 A. She -- I think it was [REDACTED] I think
9 [REDACTED] -- she had like the -- they did this weird
10 thing back then where they would have two --
11 like a dotted line and a direct manager.

12 So I believe it was [REDACTED] was
13 the dotted line, and then direct was [REDACTED] which
14 is the first name on this, [REDACTED] And it may
15 have shifted around, but I don't have good
16 recollection of that.

17 Q. Okay. And do you know what their
18 actual titles were?

19 A. No.

20 Q. And when you joined in September of
21 2020, do you know who was in charge of trust and
22 safety?

23 A. Yes. It was Yuyi.

24 Q. Full name?

25 A. That was the only -- that was --

1 just Yuyi was the only way they referred to her.

2 Q. Okay. And how do you spell that?

3 A. Y-U-Y-I, I believe.

4 Q. And did your role -- strike that.

5 Did your job title at TikTok change
6 over the years that you worked there?

7 A. Not really. It stayed mostly the
8 same. Our departments changed, but my title was
9 program manager basically the whole time.

10 Q. And can you walk me through that
11 department change you just alluded to?

12 A. Yes. I will do my best.

13 So we were issue P&P, and then they
14 made a big org change at some point that made us
15 product. It changed minor safety -- it went
16 from issue P&P to minor safety products. And
17 that was when [REDACTED] joined. Oh, gosh.

18 But, yeah, but my job like pretty
19 much more or less stayed the same. That was
20 when we grew the team as well.

21 Q. Okay. So for the entire four years
22 and change that you worked for TikTok, you were
23 a -- what was it again?

24 A. Program manager.

25 Q. Program manager. So let me just

1 start this over so it's clean.

2 So for the entire four-plus years
3 that you worked at TikTok, you were a program
4 manager in the minor safety sphere?

5 A. Correct.

6 Q. Okay.

7 A. They changed it to youth safety and
8 wellbeing at the end.

9 Q. Okay. Around when did they make
10 that change?

11 A. Right before I left.

12 Q. Okay. Why did your employment at
13 TikTok end?

14 A. It just is no longer in alignment
15 with what I would like to do with my life.

16 Q. Can you elaborate on that?

17 A. Capitalism, not into it. Not into
18 working a 9-to-5 that is very demanding. I'm
19 changing careers. I'm doing something that's
20 more in alignment with what I want to do.

21 Q. And when you say "capitalism," you
22 mean something that is profit driven, correct?

23 A. Correct.

24 Q. And TikTok's drive for profits did
25 not align with what you wanted to do the rest of

1 your professional life, correct?

2 MS. FOURNIER: Object to form.

3 THE WITNESS: I would say that
4 TikTok is too specific of an answer. I
5 would say it's more of a general feeling,
6 like any tech company, any job that is
7 around there.

8 BY MR. KLAUSNER:

9 Q. And the issue with the drive for
10 profits is that oftentimes capitalist businesses
11 put profits over the wellbeing of consumers,
12 correct?

13 A. That I don't agree with.

14 MS. FOURNIER: Object to form.

15 THE WITNESS: I don't necessarily
16 agree with that because I cannot speak to
17 it.

18 BY MR. KLAUSNER:

19 Q. Okay. Well, what is your issue or
20 your disagreement with the capitalist drive for
21 profits that does not align with what you want
22 to do with your life?

23 A. Exploitation, extraction, ruining
24 the earth. Shall I go -- you know, it just
25 doesn't -- it doesn't feel good. I did it for a

1 decade.

2 MR. KLAUSNER: Maureen, can I have
3 that answer read back again, please?

4 (Whereupon, the reporter read back
5 the following:

6 "ANSWER: Exploitation, extraction,
7 ruining the earth. Shall I go -- you
8 know, it just doesn't -- it doesn't feel
9 good. I did it for a decade.")

10 BY MR. KLAUSNER:

11 Q. So you've come to believe that tech
12 companies are engaging in exploitation,
13 extraction, and actions that are ruinous to the
14 earth, correct?

15 MS. FOURNIER: Object to form.

16 THE WITNESS: I would say that they
17 are not supportive of our growth as
18 humanity.

19 BY MR. KLAUSNER:

20 Q. And you consider TikTok to be one of
21 these companies that engages in this practice,
22 correct?

23 A. I acknowledge --

24 MS. FOURNIER: Object to form.

25 THE WITNESS: Sorry.

1 I acknowledge that TikTok is a
2 for-profit company.

3 BY MR. KLAUSNER:

4 Q. Okay. I'm going to hand you a
5 document, 2, and I'm going to write on it
6 Exhibit 2.

7 (Whereupon, TikTok-Medoff-2 was
8 marked for identification.)

9 BY MR. KLAUSNER:

10 Q. And, Ms. Medoff, you recognize that
11 we are looking at a Lark communication, correct?

12 A. Correct.

13 Q. And Lark was a means of
14 communicating internally with your colleagues at
15 TikTok, correct?

16 A. Correct.

17 Q. And you communicated with your
18 colleagues at TikTok via Lark pretty regularly,
19 correct?

20 A. Correct.

21 Q. In fact, that was the regular means
22 of communication outside of in-person
23 communication at TikTok internally, correct?

24 A. Correct.

25 Q. Did you routinely e-mail your

1 off the record, and the time is 10:10 a.m.

2 (Whereupon, a recess was taken.)

3 THE VIDEOGRAPHER: We are now going
4 back on the record, and the time is
5 10:26 a.m.

6 BY MR. KLAUSNER:

7 Q. Ms. Medoff, I'm going to hand you a
8 document, and we're marking it Exhibit 4.

9 (Whereupon, TikTok-Medoff-4 was
10 marked for identification.)

11 BY MR. KLAUSNER:

12 Q. Ms. Medoff, I've just handed you a
13 document marked as Exhibit 4.

14 Do you see it in front of you?

15 A. Yes.

16 Q. And it is a document titled TikTok
17 Online Panel, Summary of Findings, July 2020.

18 Did I read that correctly?

19 A. Correct.

20 Q. You see there's a Bates number at
21 the bottom of the first page ending in 002,
22 correct?

23 A. Correct.

24 Q. Have you seen this document before?

25 A. Not that I recall.

1 remember this file at all, but it's possible.

2 Q. Okay. If I could direct you to the
3 second-to-last page of the document, it's
4 actually a printout of the metadata that we
5 received with this document.

6 Do you see that?

7 A. This one?

8 Q. Yes.

9 Do you see where it says "Document
10 Metadata"?

11 A. Yeah.

12 Q. Certainly you understand what
13 metadata is?

14 A. I sure do.

15 Q. And do you see about a quarter of
16 the way down the page where it says "Custodian,"
17 there's a list of names, including yours,
18 correct?

19 A. Oh, yeah, mm-hmm.

20 Q. Okay. As you sit here now, you
21 don't recall seeing this document?

22 A. No, I don't. I remember Internet
23 Matters, but I don't remember this document at
24 all.

25 Q. Okay. Do you recall seeing

1 documents like this during your time at TikTok?

2 A. Like specifically from Internet
3 Matters or just, like, in general?

4 Q. Documents that summarize findings.

5 A. Oh, yeah, of course.

6 Q. Okay. And I think you might even
7 have said that in preparing for the deposition
8 you refreshed your recollection by looking at,
9 in part, studies and study findings, correct?

10 MS. FOURNIER: Object to form.

11 THE WITNESS: They were not study
12 findings, no.

13 BY MR. KLAUSNER:

14 Q. Did you look at studies?

15 A. With studies, yeah. Like very high
16 level, like again -- yeah, very high level, so
17 not like definitive. I wouldn't say that they
18 were definitive findings.

19 Q. Okay. So if we could go to the page
20 ending in 004. Actually let's forget that.
21 Strike that.

22 MS. FOURNIER: You can just look at
23 the end numbers.

24 THE WITNESS: Oh, yeah, yeah.

25 ///

1 apps such as TikTok."

2 Did I read that correctly?

3 A. Yes.

4 Q. Were you aware when you were working
5 at TikTok some children felt a compulsion to
6 continue using the app?

7 A. No.

8 Q. If you go to the page ending in 036.
9 And let me know when you're there.

10 Do you see where it says at the top
11 "Evening 1: A 'normal' night (during
12 lockdown*)'?"

13 A. Mm-hmm.

14 Q. And if you look at the rightmost
15 column, it states, "1-145 notifications received
16 between 8-10pm."

17 Do you see where it says that?

18 A. Yes.

19 Q. When you were working at TikTok in
20 age assurance, were you aware that some users --
21 some children were receiving upwards of 145
22 notifications within a two-hour time period?

23 A. No.

24 Q. And I'm not trying to be specific to
25 those numbers, but generally speaking were you

1 A. Correct.

2 Q. Okay. So this working group is
3 having its first meeting as of around
4 October 2020, correct?

5 A. Yes.

6 Q. So if you could turn to the page
7 ending 9598, and let me know when you're there.

8 A. 9598, I don't think those -- I don't
9 have those numbers. Mine just have --

10 Q. Maybe it's cut off at the bottom?

11 MS. FOURNIER: Yeah, no, the ones we
12 have are not labeled that way.

13 MR. KLAUSNER: Okay. We'll move on
14 from that document and come back to it. I
15 think it's a printing error of two
16 documents put together.

17 BY MR. KLAUSNER:

18 Q. Okay. Can you set that aside for
19 now?

20 A. Yes.

21 Q. Okay. Thank you.

22 I'll hand you a document marked as
23 Exhibit 8.

24 (Whereupon, TikTok-Medoff-8 was
25 marked for identification.)

1 BY MR. KLAUSNER:

2 Q. And do you see on the first page it
3 says Underage Users: Detection, Safety,
4 Privacy, and Age-Appropriate Design at the top?

5 A. Yes.

6 Q. And do you see the Bates number at
7 the bottom ending 8048?

8 A. Yes.

9 Q. And if I represent to you that
10 TikTok produced this as part of your custodial
11 file, do you have any reason to dispute that?

12 A. Yeah, that's possible.

13 Q. Does this document look familiar to
14 you?

15 A. No. I didn't write this.

16 Q. Okay. Do you see on the first
17 page --

18 A. Yeah.

19 Q. On the first page about two-thirds
20 of the way down -- actually about half of the
21 way down it says, "This document will seek to
22 answer the following questions:"

23 Do you see that? And there is a
24 list of questions below that?

25 A. Yes.

1 existence of any legal barriers preventing the
2 creation of a Kids Mode outside of the US?

3 A. I wasn't aware, but I'm sure there's
4 different laws in different countries, so it's
5 possible, but...

6 Q. So you're saying that for US Kids
7 Mode there was a third-party content moderator
8 that determined what content should be available
9 on the app?

10 A. Yeah.

11 Q. Okay. And it's your belief that
12 that content moderation could not have
13 translated to other English-speaking countries
14 throughout the world like in the UK or --

15 A. I guess I would say "content
16 moderation" is probably not the right word.
17 Content curation is a better way to say it.

18 Maybe it could have worked. I mean,
19 it just never was a viable option. I didn't
20 work on it personally, I read some of the
21 documents, but I knew it was a huge undertaking.

22 Q. If you could turn to the page ending
23 in 049. Do you see the heading Age-Assurance?

24 A. Mm-hmm.

25 Q. And underneath it says, "Focused on

1 developing mechanisms, processes, and product
2 solutions to better understand the age of our
3 users globally, and processes in place to remove
4 underage users."

5 Did I read that correctly?

6 A. Yes.

7 Q. And then below that it asks the
8 questions, "How do we proactively prevent
9 children (under 13) from accessing the app?"

10 Do you see that?

11 A. Yes.

12 Q. And the answer is on the page, "We
13 rely on an age-gate (self declaration) in all
14 markets."

15 Right?

16 A. Yes.

17 Q. So at least as of the time of this
18 document, the only thing preventing a child
19 under 13 from accessing the main TikTok
20 experience is if they enter in a birth date
21 indicating they are younger than 13, correct?

22 A. Correct.

23 Q. And if a child enters a birth date
24 saying they're over 13, they can access the main
25 TikTok experience?

1 A. Correct.

2 Q. Okay. Another question on this page
3 is, "How do we reactively detect children who
4 are accessing the app? How do we reactively
5 detect underage minors (under 16) who are
6 accessing the age-gated features?"

7 Did I read that correctly?

8 A. Yeah.

9 Q. Okay. And underneath that it says,
10 "We currently have an underage-model to detect
11 underage users in White T markets and KR."

12 Correct?

13 A. Yes.

14 Q. KR is South Korea?

15 A. Yes.

16 Q. Okay. What are "White T markets"?

17 A. No idea.

18 Q. And under that it says, "This model
19 pushes users into underage account queue that is
20 reviewed by moderators."

21 Correct?

22 A. Yeah.

23 Q. Okay. And you said that this
24 document is referring to global?

25 A. Yes. This was not done in the US.

1 Q. Right. This push into an underage
2 account queue that is reviewed by moderators was
3 not being done in the US?

4 A. Correct.

5 Q. Was there any technological barrier
6 to doing that in the US?

7 A. I have no idea what the restrictions
8 were in the US because I was not working on it.

9 Q. But I'm asking you if you're aware
10 of any technological --

11 A. The technology is there.

12 Q. Right.
13 So absent any legal barriers that
14 you may or may not be aware of or regulatory
15 barriers, TikTok technologically had the means
16 to implement this model in the US, correct?

17 A. Yes.

18 Q. If you go to the next page, you see
19 at the top -- and this is the page ending in
20 050.

21 A. Mm-hmm.

22 Q. Do you see where it says, How can we
23 improve on this?

24 A. Yes.

25 Q. And if we skip down a few lines, it

1 that's not like a technology issue.

2 MR. RYDER: We can go ahead and set
3 this exhibit aside.

4 And if we can pull Tab 31, we will
5 mark this as Exhibit 22.

6 (Whereupon, TikTok-Medoff-22 was
7 marked for identification.)

8 BY MR. RYDER:

9 Q. Ms. Medoff, you should have just
10 been handed a document that is a Lark chat
11 between you and [REDACTED]

12 Do you see that?

13 A. Yes.

14 Q. And the Bates number on the bottom
15 of the first page ends in 4516.

16 Do you see that?

17 A. Yes.

18 Q. And the first message of the chat is
19 dated April 7, 2022, correct?

20 A. Yep.

21 Q. And who was [REDACTED]

22 A. [REDACTED] at that time -- again,
23 people's roles changed so often that it was hard
24 to keep track of. He was in the EU. He was
25 some sort of lead in the EU. He used to be more

1 an understanding why those efforts were being
2 halted?

3 A. No.

4 Q. Okay. Did TikTok have a process for
5 underage appeals in the US at that time?

6 A. I'm trying to -- it might not have
7 been launched then yet. I don't know. I don't
8 know. I don't remember when everything was
9 launched exactly.

10 Q. It's not a quiz at this point. I
11 think we'll see some other documents.

12 It's fair to say that might have
13 been something percolating in the US at that
14 time, is that fair?

15 A. Yes. I was not the person to
16 implement underage appeals in the US.

17 Q. Okay. In your second message on the
18 next page, you note that, "Underage bans in Q1
19 2022 are just over 20 million, a total increase
20 of approximately 5 million from Q4 2021."

21 Did I read that correctly?

22 A. Yep.

23 Q. You go on to note that, "Underage
24 bans has been steadily increasing because ops
25 have been adding more moderator headcount,

1 correct?

2 A. Correct.

3 Q. Okay. And the number here
4 referencing the 20 million Q1 2022, this does
5 not account for all underage accounts on TikTok,
6 right?

7 A. This just -- this accounts for the
8 accounts that are banned.

9 Q. Right. Meaning there were still
10 non-banned underage accounts on TikTok after Q1
11 2022?

12 A. There possibly could be accounts
13 that were missed, yes.

14 Q. Okay. And removing underage
15 accounts is something TikTok continued to work
16 on throughout 2022, correct?

17 A. Correct.

18 Q. And something TikTok continued to
19 work on in 2023, correct?

20 A. I would assume so. I wasn't working
21 on it directly by 2023.

22 Q. Was it your --

23 A. That's fine.

24 Q. I apologize.

25 Was it your general understanding

1 that TikTok was still engaging in efforts to
2 remove underage accounts in 2023?

3 A. Yes.

4 Q. And in 2024, you wouldn't have any
5 knowledge?

6 A. I don't know anything from 2024,
7 yeah.

8 Q. Does it concern you that TikTok was
9 reporting it had so many underage accounts at
10 this time?

11 A. I feel like "concern" is a -- right,
12 I mean, it concerned me in the sense that I
13 didn't want them to be there. It didn't
14 surprise me, though, because children lie.

15 Q. And that's something TikTok was
16 aware of, correct?

17 A. I think that all you have to do is
18 look at the age-gate and understand that it's
19 easy to put in whatever.

20 Q. And other employees at TikTok
21 understood that, too, right?

22 A. Yeah, yes.

23 Q. Okay. Is that why you think there
24 were so many accounts removed in Q1 of 2022?

25 A. No. The reason that many accounts

1 were removed in Q1 of 2022 was because of the
2 new underage detection models.

3 MR. RYDER: We can take that exhibit
4 down.

5 Q. Shift gears a little bit. I know
6 we've been talking about underage users. I
7 believe a different term we talked about
8 earlier -- strike that.

9 I believe Mr. Klausner asked you
10 earlier about your definition of the word
11 "minors," and I believe your testimony was that
12 in your team minors refers to individuals
13 between the ages of 13 and 17.

14 Is that correct?

15 A. Minors on the platform, yes.

16 Q. Okay. And another phrase TikTok
17 uses to describe that population is "hidden
18 minors," correct?

19 A. Correct.

20 Q. Is that an accurate description of
21 what hidden minors are?

22 A. Yeah, hidden minors are basically
23 users who are over the age of 13 but under 18
24 and who are using the platform with full access
25 as if they were 18.

1 TikTok requires the users to verify their age
2 using some other metric, correct?

3 A. Yes, there's a few different -- they
4 have a few different methods that they could
5 choose from.

6 Q. Okay.

7 MR. RYDER: Let's pull up Tab 29,
8 and I believe this is Exhibit 27.

9 (Whereupon, TikTok-Medoff-27 was
10 marked for identification.)

11 A. I remember this.

12 BY MR. RYDER:

13 Q. And, Ms. Medoff, was that your
14 testimony that you remember this document? Is
15 that correct?

16 A. Yes.

17 Q. Okay. And you should have in front
18 of you a document titled Underage Appeals,
19 Introduction and Discussion.

20 Do you see that?

21 A. Yep.

22 Q. And the Bates number on this opening
23 page ends in 3213, is that correct?

24 A. Yes.

25 Q. Okay. And the face of the document

1 itself states that it is dated March 2021.

2 Do you see that?

3 A. Yep.

4 Q. Okay. Did you author this document?

5 A. It was a collaboration between
6 myself and Amy Classen.

7 Q. And at that time she was one of --

8 A. She was --

9 Q. -- one of the owners within the
10 minor safety space, correct?

11 A. She was my manager.

12 Q. I want to direct your attention to
13 slide or page 4. This is the Bates ending 0003.
14 And there's a pyramid image on the slide.

15 Do you see that?

16 A. Yes.

17 Q. And it notes on the heading that age
18 assurance is an enormous component of TikTok's
19 overall safety strategy for minors.

20 Do you see that?

21 A. Yeah.

22 Q. And you agree with that sentiment,
23 correct?

24 A. I do.

25 Q. Okay. And then do you also see

1 there are speaker notes underneath the slide?

2 A. Yep.

3 Q. Okay. And they note that, "Beyond
4 our baseline legal compliance obligations, age
5 assurance is the foundation of every Minor
6 Safety privacy and safety strategy at TikTok."

7 Did I read that correctly?

8 A. Yes.

9 Q. And you agree with that sentiment,
10 correct?

11 A. I do. I did.

12 Q. It goes on to note that,
13 "Understanding the age of our users - and
14 removing underage users - is critical for
15 ensuring that we provide an experience that is
16 age-appropriate, safe, and takes into
17 consideration the unique developmental
18 capacities of minors."

19 Did I read that correctly?

20 A. Yeah.

21 Q. And do you agree with that sentiment
22 as well?

23 A. Yes.

24 Q. And finally it notes that, Unless
25 TikTok knows the age of its users, it cannot do

1 CERTIFICATE OF COURT REPORTER

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

15 Dated this 20th day of May, 2025.

16 <%21527,Signature%>
17 _____

18 MAUREEN O'CONNOR POLLARD

19 CSR No. 14449
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