

AMENDED Exhibit 405

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

Matthew Tenenbaum

1

1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA

3 -----
4 IN RE: SOCIAL MEDIA ADOLESCENT Case No.

5 ADDICTION/PERSONAL INJURY 4:22-MD-03047-YGR

6 PRODUCTS LIABILITY LITIGATION MDL No. 3047
7 -----

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF LOS ANGELES

10 UNLIMITED JURISDICTION
11 -----

12 Coordination Proceeding Judicial Council

13 Special Title(Rule 3.550) Coordination Proceeding

14 SOCIAL MEDIA CASES No. 5255
15 -----

16 This Document Relates to:

17 ALL ACTIONS
18 -----

VOLUME I

19 VIDEO-RECORDED DEPOSITION OF MATTHEW TENENBAUM
20

21 Tuesday, January 28, 2025

22 10:01 AM
23

24 Job No.: 6966382

25 Reported by: Denise Dobner Vickery, CRR-RMR

oath.

- - -

MATTHEW TENENBAUM

called for examination, and, after having been
duly sworn, was examined and testified as
follows:

- - -

EXAMINATION

- - -

BY MR. RYDER:

Q. Can you please state your full name
for the record and spell your last name for the
court reporter, please.

A. Sure. Matthew Tenenbaum. Tenenbaum
is spelled T as in Tom e n-as-in Nancy e n-as-in
Nancy b-as-in boy a-u m-as-in Mary.

Q. Good morning, Mr. Tenenbaum.

A. Good morning.

Q. We just met off the record. We
haven't met before.

My name is Chris Ryder. Along with
my colleague, Keith Verrier, we'll be taking your
deposition today on behalf of the plaintiffs.

You've been sworn by the court
reporter, which means you're under oath. That

1 MR. COWAN: Thanks.

2 MR. RYDER: We'll keep a
3 running objection on that.

4 Let's pull up tab 2, and we
5 will mark this as Exhibit 2.

6 (Document marked for
7 identification as TikTok-Tenenbaum
8 Exhibit 2.)

9 BY MR. RYDER:

10 Q. Mr. Tenenbaum, this is a screenshot
11 of your LinkedIn profile that we took. I hope we
12 can just walk through it and discuss your job
13 history at TikTok.

14 You started working for TikTok in
15 May of 2022; is that correct?

16 A. It is. Though mind if I take a
17 second to read this over?

18 Q. Please.

19 A. It's been a while.

20 (Reviews document.)

21 Okay. Sorry. Thank you.

22 Q. Yeah.

23 So your first role was as a
24 senior -- senior product manager; correct?

25 A. That is correct.

1 Q. Okay. And your LinkedIn page says
2 that from May 2022 to December 2023 you "Lead
3 Family Pairing, TikTok's suite of parental control
4 tools. Worked closely with our policy teams,
5 regulatory teams, and digital wellbeing experts to
6 iterate on our suite of tools to better meet the
7 challenges of parenting in a digital age."

8 Did I read that correctly?

9 A. Yes.

10 Q. Okay. And then from December 2023
11 to the present, you remained a senior product
12 manager, but you switched what product you
13 oversaw; is that correct?

14 A. That's correct.

15 Q. Okay. And so you switched from
16 Family Pairing to Age Assurance; right?

17 A. Yeah.

18 Q. Okay. So your LinkedIn says for
19 your current job "Spearheading the development and
20 implementation of innovative Age Assurance
21 features to ensure compliance with age
22 restrictions and protect the wellbeing of our
23 platform's diverse user base."

24 Did I read that correctly?

25 A. Yes.

1 Q. Okay. Can you explain to the jury
2 what you do as a product manager at TikTok?

3 A. Sure. Product manager I like to use
4 the metaphor as a diplomat. So often I sit in
5 between a lot of intersecting business teams.
6 Everyone has different ideas, different
7 initiatives, different kind of individualized
8 goals, and my object is to pull together the
9 strategy and pull together the people to make
10 things happen.

11 So as you read off of my LinkedIn,
12 really it's just the theme where I'm organizing
13 folks. So originally I was working on Family
14 Pairing achieving the project strategy goals
15 around that feature area, and then when I
16 transferred to Age Assurance, the concept of work
17 was the same. Working with different
18 stakeholders, gathering the ideas, prioritizing
19 them, and then moving them forward to make sure
20 that things get built.

21 Q. So is it fair to say then your job
22 tasks didn't switch when you switched from Family
23 Pairing to Age Assurance?

24 A. They changed a bit only because the
25 work is a little bit different. Products always

1 have their own nuances, but, by and large, the
2 title and function of product manager was the
3 same.

4 Q. And in both roles, your job was
5 housed in the Trust & Safety team; correct?

6 A. That's right.

7 Q. Okay. And within Trust & Safety is
8 kind of a minor safety team; is that -- is that
9 fair to say?

10 A. That's correct.

11 Q. Okay. Who do you currently report
12 to?

13 A. I currently report to Rand Lee.

14 Q. And what's their role at TikTok?

15 A. They are also a product manager.
16 They're just a team lead focusing on our pillar of
17 Age Assurance.

18 Q. Okay. And at one point in time, you
19 reported to a Jordan -- Jordan Furlong; is that
20 correct?

21 A. Yes.

22 Q. And what is his role at TikTok?

23 A. Jordan, to my knowledge, is no
24 longer at TikTok.

25 Q. Okay. When he was a TikTok

1 when I was the product manager for it, and so for
2 that period, yes, I was driving that part. But I
3 can't speak to the strategy currently.

4 Q. Do you think the purpose of Family
5 Pairing has changed since you moved over to Age
6 Assurance?

7 A. I can't speak to it. I'm no longer
8 responsible for that.

9 MR. RYDER: Okay. Let's turn
10 to what Family Pairing is. Let's pull up
11 tab 5, and we'll mark this as Exhibit 5.

12 (Document marked for
13 identification as TikTok-Tenenbaum
14 Exhibit 5.)

15 BY MR. RYDER:

16 Q. This document is titled "Family
17 Pairing 101" on the first page.

18 Do you see that?

19 A. I do.

20 Give me one sec, though, to thumb
21 through it.

22 Q. Yeah.

23 A. (Reviews document.)

24 All right. Thanks.

25 MR. RYDER: And, counsel, I'm

1 going to note for the duration of my
2 examination, I'm going to represent that
3 the exhibits will have been produced by
4 TikTok as part of Mr. Tenenbaum's
5 custodial file. I'm happy to mention
6 that as we introduce exhibits, but I'm
7 just going to make a standing
8 representation that.

9 MR. COWAN: It's your depo,
10 counsel.

11 BY MR. RYDER:

12 Q. Okay. So this was produced by
13 TikTok lawyers. According to the metadata
14 produced to us by TikTok, this was created on
15 August 29, 2023.

16 Do you recognize this document?

17 A. I do, yes.

18 Q. Is it fair to say this is a summary
19 of what Family Pairing is?

20 A. This document is meant to kind of
21 simplify for a broad audience internally how
22 Family Pairing works and the different components
23 within it.

24 Q. Okay. So do you see the first
25 section is a title that says "What is Family

1 comment on their linked teens' videos; correct?

2 A. That's correct.

3 Q. Parents can also select who can view
4 their teens' liked videos; correct?

5 A. That's correct.

6 Q. And then parents can also restrict
7 who can send messages to their teen's account;
8 right?

9 A. As long as that teen is over 16,
10 correct.

11 Q. Okay. And there's a list of FAQs
12 towards the bottom of the document. I have this
13 on page 5.

14 If you go to question 6 on page 6,
15 do you see the question:

16 "How does a Family Pairing link get
17 cancelled?"

18 A. Uh-huh.

19 Q. Okay. So it says:

20 "Family Pairing can be exited by
21 either the parent or teen user. Teens can unlink
22 from the Family Pairing home page. Parents can
23 select a teen from Family Pairing and unlink from
24 there. If the teen unlinks, the settings
25 implemented by the parent will remain locked for

1 48 hours."

2 Did I read that correctly?

3 A. You did, yes.

4 Q. So a kid can unlink from Family
5 Pairing at any time; right?

6 A. That's correct. Though the parent
7 will, of course, be notified and their settings --
8 the teen's settings will be locked for 48 hours.

9 Q. But a parent can't prevent a teen
10 from unlinking; right?

11 MR. COWAN: Form.

12 THE WITNESS: I can't speak
13 to what happens off the platform.

14 But if the teen navigates --
15 if any user navigates to that section,
16 they can cancel the link, as the document
17 describes.

18 BY MR. RYDER:

19 Q. So there's no mechanism on the
20 TikTok app that would allow a parent to prevent
21 unlinking; is that fair?

22 A. That's correct.

23 Q. Okay. And then the only limit is
24 that the settings that the parent sets through
25 Family Pairing stay in place for 48 hours; right?

1 MR. COWAN: Sure.

2 THE VIDEOGRAPHER: Okay.

3 Stand by. Time is 10:58 AM and we're
4 going off the record.

5 (A recess was taken.)

6 THE VIDEOGRAPHER: The time is
7 11:14 AM and we're back on the record.

8 BY MR. RYDER:

9 Q. Thanks for coming back,
10 Mr. Tenenbaum.

11 Do you understand that you're still
12 under oath; correct?

13 A. I do.

14 Q. Okay. I want to briefly go back to
15 unlinking.

16 How is a parent notified when a kid
17 unlinks from Family Pairing?

18 A. There are a few different
19 notifications that I worked on. There is the
20 in-app popup, an in-app inbox message, as well as
21 a push notification.

22 Q. So the notification would be coming
23 from the TikTok app; is that correct?

24 A. That's correct.

25 Q. So if a parent is not an avid TikTok

1 user, would they be notified that their kid has
2 unlinked?

3 MR. COWAN: Form.

4 THE WITNESS: The amount of
5 time that the parent uses the app doesn't
6 really factor in. That's why we covered
7 such a broad range of methods. Push it
8 doesn't really care about how often you
9 open the app, and the in-app notices are
10 there to just make sure there's
11 additional awareness.

12 BY MR. RYDER:

13 Q. For a parent to receive a push
14 notification, they would have to have push
15 notifications for TikTok enabled on their device;
16 correct?

17 A. That's correct.

18 Q. Okay. So TikTok does not send an
19 e-mail notification when a kid unlinks from Family
20 Pairing?

21 A. Not to my knowledge, no.

22 Q. And TikTok does not send a text
23 message to a parent when a child unlinks from
24 Family Pairing; correct?

25 A. Not to my knowledge, no.

1 that same question, counsel.

2 THE WITNESS: My answer here
3 is as a product manager when I was
4 covering Family Pairing was that that
5 list was very individual and through our
6 consultations we worked to understand
7 what those individual potential harms
8 were and build the best tools we could to
9 empower parents and guardians to address
10 them for their teens' individual needs.

11 BY MR. RYDER:

12 Q. Okay. Let's switch topics a little
13 bit.

14 TikTok wants parents to sign up and
15 use Family Pairing; is that fair?

16 A. I would maybe clarify here.

17 The sign-up part isn't really a part
18 of the factor. We definitely want parents to use
19 Family Pairing, though.

20 MR. RYDER: Okay. Let's pull
21 up tab 14. We'll introduce this as
22 Exhibit 14.

23 (Document marked for
24 identification as TikTok-Tenenbaum
25 Exhibit 14.)

1 BY MR. RYDER:

2 Q. Mr. Tenenbaum, let me know when
3 you've had a chance to review the document.

4 A. Thanks.

5 (Reviews document.)

6 Thank you. I'm ready.

7 Q. Okay. So this is a Lark chat;
8 right?

9 A. That's correct.

10 Q. Can you tell the jury what Lark is?

11 A. Sure. Lark is like I'm sure many
12 folks use a workplace tool. It's our in-house
13 communications and work tool. So it involves
14 chats. It involves documents. It's very similar
15 to Teams or Google Workspace if folks are using
16 those.

17 Q. All right. And so you use Lark as a
18 regular part of your job at TikTok; correct?

19 A. That's correct.

20 Q. Okay. And you use it to communicate
21 with your coworkers?

22 A. That's correct.

23 Q. Would you say you use Lark to
24 communicate with your coworkers more than e-mail?

25 A. I would say I don't use e-mail or

1 almost never use e-mail. I primarily use Lark.

2 Q. Okay. Is that the case for other
3 TikTok employees as well?

4 A. I can't speak for other folks. I
5 think it's a fair assumption, though.

6 Q. Okay. Is it fair to say it's a
7 common mode of communication for TikTok employees?

8 A. Yeah, it's our main workplace tools.

9 Q. Okay. So you also use it to share
10 documents with team members?

11 A. That's correct. It's also the
12 platform that the documents are hosted through.

13 Q. Okay. So then you use Lark to
14 discuss things like Family Pairing when you were
15 the product manager over Family Pairing; right?

16 A. That's correct.

17 Q. Okay. And when we're looking at
18 your Lark chats with other TikTok employees, is it
19 fair to say you're speaking in your capacity as a
20 TikTok employee?

21 A. That's correct.

22 Q. Okay. And then depending on the
23 time frame, that would either be as the product
24 manager over Family Pairing or the product manager
25 over Age Assurance; is that fair?

1 A. That's fair.

2 Q. Okay. So let's look at the exhibit.

3 This is a Lark chat that has your

4 name and some Mandarin characters. We ran a

5 translate just on the name and believe it is a [REDACTED]

6 [REDACTED] or [REDACTED]

7 Does that name sound familiar to
8 you?

9 A. Yes, I think I recognize that name.

10 Q. Okay. Do you know who that --
11 strike that.

12 Do you know what their role at
13 TikTok is?

14 A. At the time of this chat, just from
15 the context of reading the document, they were our
16 partner for the research project that we were
17 aiming to accomplish. I don't remember their
18 exact role or their title, but in the context of
19 this conversation, they were supporting our user
20 research goals.

21 Q. Okay. And then I'm going to direct
22 you to page 3 of this document. This is Bates
23 ending 039. And then I'm going to ask you to look
24 at your first message, which is going to look like
25 the third entry. It's a message dated May 25,

1 2023.

2 Do you see that?

3 A. I do.

4 Q. Okay. So you say:

5 "The Family Pairing linking funnel
6 is a cliff. Around a million potential users a
7 week will enter Family Pairing each week and when
8 they reach the QR screen over 90% of them drop."

9 Did I read that correctly?

10 A. You did.

11 Q. So you were aware that many parents
12 weren't signing up for Family Pairing; correct?

13 MR. COWAN: Object to form.

14 THE WITNESS: I think we
15 should clarify a bit here.

16 What's being discussed is a
17 funnel. Meaning we're not talking about
18 individuals' intent. We're just talking
19 about a metric that shows when the user
20 navigates to a certain step, they drop
21 off.

22 It's impossible to know the
23 intent -- the intent behind that action.
24 We can just use that to make certain
25 inferences.

1 In this case, we're using that
2 understanding to help work on our process
3 of making linking easier.

4 BY MR. RYDER:

5 Q. That's fair.

6 So putting intent aside, you were
7 aware that when people enter Family Pairing,
8 reached the QR screen, the vast majority of them
9 did not end up linking with their teen's account;
10 is that fair?

11 A. I wouldn't characterize that because
12 this does not account for multiple returns. So
13 it's entirely possible someone started the process
14 or got the idea, and then came back later. That
15 level of nuance is not included in this
16 conversation.

17 MR. RYDER: Okay. You can set
18 this exhibit aside.

19 Let's pull up tab 15. We'll
20 mark this as Exhibit 15.

21 (Document marked for
22 identification as TikTok-Tenenbaum
23 Exhibit 15.)

24 BY MR. RYDER:

25 Q. And, Mr. Tenenbaum, let me know when

1 that, what I mean to say is exactly what the
2 message says.

3 We wanted to make things easier to
4 use. So we had this very mature, very robust set
5 of tools that were really helpful in a lot of
6 ways, but we want to make sure that not only could
7 parents use them, but use them more easily.

8 And as you can see here, the
9 hypothesis at the time was: If we have this
10 mature robust set of tools, now how do we get
11 parents' opinions on how to make them more usable?

12 I referred earlier to this idea that
13 we wanted to make Family Pairing more actionable.
14 This is an extension of that same strategy.

15 MR. RYDER: Okay. We can set
16 that exhibit aside.

17 Let's pull up tab 18. We'll
18 mark this as Exhibit 18.

19 (Document marked for
20 identification as TikTok-Tenenbaum
21 Exhibit 18.)

22 THE WITNESS: Thank you.

23 BY MR. RYDER:

24 Q. And let me know when you're ready to
25 discuss the document.

1 A. (Reviews document.)

2 All right. Thank you. I'm ready.

3 Q. Okay. So this is a Lark chat
4 between you and Jordan Furlong; correct?

5 A. That's correct.

6 Q. We'll go over some specific
7 messages, but the chat largely looks like it has
8 messages from January and February of 2023.

9 Was Jordan Furlong your boss or kind
10 of your direct report at that time?

11 A. I was Jordan's direct report at that
12 time, yes.

13 Q. Thank you.

14 Okay. Like to direct your attention
15 to page 3. This is Bates ending 938, and I'm
16 going to have you look at your fifth message. So
17 this is a message dated February 2, 2023 military
18 hours has it at 15:19:46.

19 Do you see that?

20 A. I do.

21 Q. Okay. You say:

22 "I just checked in FP and linking
23 with a teen also automatically disables their
24 daily screen time limit."

25 Did I read that correctly?

1 A. You did.

2 Q. Okay. You then go on in the next
3 message to say:

4 "Since we're going to enable it by
5 default, I can write up a separate PRD or we can
6 try to sneak retaining the teen's limit into the
7 default work you're doing."

8 Did I read that correctly?

9 A. You did.

10 Q. Okay. Then Jordan responds by
11 asking:

12 "Even if the setting hasn't been
13 enabled?"

14 Did I read that correctly?

15 A. You did.

16 Q. Then if you want to jump to the next
17 page, the conversation continues. You say:

18 "Yeah is done automatically by the
19 link. So if Teen User has a limit set to 60
20 minutes, they pair with Parent. Limit is reset to
21 'Off.'"

22 Did I read that correctly?

23 A. You did.

24 Q. Okay. Jordan then sends a message
25 saying:

1 "Dangerous question, but do you know
2 why lol."

3 Did I read that correctly?

4 A. You did.

5 Q. I'm assuming "lol" is parlance for
6 laughing out loud; is that -- is that fair?

7 A. That's correct.

8 Q. Okay. Then he asks a follow-up
9 question:

10 "Or is it just a design flaw."

11 Did I read that correctly?

12 A. You did.

13 Q. Okay. You respond. You say:

14 "It's this one. It's ALWAYS this
15 one."

16 Did I read that correctly?

17 A. You did.

18 Q. And do you know what those
19 characters are next to the text in that message?

20 A. Based off what I've seen so far, it
21 seems that Lark system messages are shown in
22 brackets. So, and knowing myself, I know that
23 that's an emoji. So I'm assuming that when you
24 see that, it just reflects an emoji.

25 Q. Okay. Underneath you go on to say:

1 "Well actually it's a design flaw
2 introduced by speedy development that didn't care
3 about edge cases since urgency was more important
4 than quality."

5 Did I read that correctly?

6 A. You did.

7 Q. Jordan replies:

8 "So weird to me when these things
9 happen. We're held to such a higher standard."

10 Did I read that correctly?

11 A. You did.

12 Q. And, Mr. Tenenbaum, I'm going to ask
13 you to read your next message out loud to the
14 jury.

15 A. Sure. The message reads from
16 Matthew Tenenbaum on February 2, 2023.

17 "Haha Family Pairing is where all
18 good product design goes to die it seems."

19 Q. Then can you also read your next
20 message on the following page to the jury.

21 A. It reads from Matthew Tenenbaum 2023
22 February 2.

23 "It makes some sense though, it
24 really hasn't been anyone's priority outside of
25 urgent action in response to regulators."

1 Q. And those are both messages that you
2 sent to Jordan Furlong; correct?

3 A. I sent those messages, yes.

4 Q. Okay. So Family Pairing wasn't a
5 priority to TikTok unless a regulator was
6 pressuring it; right?

7 MR. COWAN: Object to form.

8 THE WITNESS: I have to
9 disagree with that.

10 You can read my messages as
11 someone who is really passionate about
12 this and is dealing with a lot of work
13 that they're trying to do and is really
14 excited about. I would say that this is
15 all hyperbole at best and just me venting
16 to a peer at worst.

17 BY MR. RYDER:

18 Q. But you did say on February 2, 2023:
19 "It really hasn't been anyone's
20 priority outside of urgent action in response to
21 regulators."

22 You said that correct?

23 A. I said it, but like I said, this is
24 the context of the conversation and where I was at
25 really motivated in wanting to do a lot.

1 previous answers, that was me engaging in
2 hyperbole because I was venting to a
3 coworker and wanted -- was emphasizing
4 how much I wanted to do.

5 BY MR. RYDER:

6 Q. Did you engage in hyperbole about
7 this specific issue other times?

8 A. It's impossible to say.

9 MR. RYDER: Okay. Well, let's
10 pull up tab 19.

11 (Document marked for
12 identification as TikTok-Tenenbaum
13 Exhibit 19.)

14 MR. COWAN: After this, can we
15 maybe break for lunch?

16 MR. RYDER: Yeah. So I
17 actually have this and then one more
18 exhibit. So we should be under -- I'll
19 try to wrap it up in five minutes if that
20 works for you?

21 MR. COWAN: Five minutes is
22 fine.

23 BY MR. RYDER:

24 Q. Okay. And, Mr. Tenenbaum, let me
25 know when you have a chance to review the

1 document.

2 A. Okay. Thank you.

3 (Reviews document.)

4 I'm ready. Thank you.

5 Q. Okay. So this is another Lark chat;
6 right?

7 A. That's correct.

8 Q. This is a Lark chat between you and
9 [REDACTED]

10 A. That's correct.

11 Q. Who is [REDACTED]

12 A. [REDACTED] is another product manager in
13 the company. I don't remember off the top of my
14 head what team he was working on at that time.

15 Q. Okay. He's someone you worked with
16 when you were product manager over Family Pairing?

17 A. He was more of a peer, but yes, we
18 did work together on some things.

19 Q. Okay. I'm going to direct your
20 attention to page 2 of this document. This is
21 Bates ending 642, and I'm going to direct you to
22 the second to last message is dated June 5, 2023.
23 It starts with the phrase "It's sad."

24 Do you see that?

25 A. I do.

Matthew Tenenbaum

137

AFTERNOON SESSION

(1:28 p.m.)

MATTHEW TENENBAUM

called for continued examination and, having been previously duly sworn, was examined and testified further as follows:

EXAMINATION (CONTINUED)

THE VIDEOGRAPHER: The time is 1:28 PM and we're back on the record.

MR. RYDER: Thanks for coming, Mr. Tenenbaum. Get a nice lunch.

I'd like to pick up again on unlinking with Family Pairing.

We're going to pull up exhibit -- sorry. We're going to pull up tab 21. We'll mark that as Exhibit 21.

(Document marked for identification as TikTok-Tenenbaum Exhibit 21.)

BY MR. RYDER:

Q. And before I ask you any questions about the document, Mr. Tenenbaum, you understand you're still under oath; correct?

A. Understood and just give me a second to read it.

1 Q. Yep. Yep. Please let me know when
2 you're ready.

3 A. (Reviews document.)

4 Okay. I'm ready. Thank you.

5 Q. This is a Lark chat between yourself
6 and [REDACTED]; correct?

7 A. That's correct.

8 Q. And who's [REDACTED]?

9 A. [REDACTED] was a policy leader
10 on the Trust & Safety team. You'll have to
11 forgive me. I don't remember what her title or,
12 like, official role level was.

13 Q. Okay. I want to direct your
14 attention to the second to last message on the
15 first page. You start -- it's a message dated
16 November 8, 2023. You start with "Hey there."

17 You see that?

18 A. I do.

19 Q. Okay. You say:

20 "Hey there! Wanted to follow up on
21 what you've been hearing externally about Family
22 Pairing. You mentioned folks' concerns on
23 unlinking, but was there anything else that came
24 up often? I'm in the midst of 2024 planning so
25 this kind of feedback is super helpful."

1 Q. And you don't think lifting that
2 lock has any impact on utility of Family Pairing?

3 A. I can't speculate too much here, but
4 I feel like that is a necessary and useful
5 precaution to help balance the different interests
6 at play.

7 Q. So earlier you testified, "I
8 definitely disagree with anything that says
9 there's an easy way to dismantle the utility of
10 Family Pairing"; is that correct?

11 A. That's correct.

12 Q. But if a child unlinks their
13 account, the limits that Family Pairing imposed
14 can be removed; right?

15 MR. COWAN: Object to form.

16 THE WITNESS: Well, that's
17 true. Again, there's a couple of days of
18 delay. The parent is notified. I don't
19 think it's fair to characterize that as
20 easy.

21 BY MR. RYDER:

22 Q. But is it fair to say that unlinking
23 does impact the utility of Family Pairing?

24 A. I think it's fair to say that
25 unlinking is a function of Family Pairing and one

1 that we considered in our design both in the fact
2 that we offer it. You can see what some of those
3 reasons in my message with [REDACTED] about some of the
4 risks we want to mitigate. But also in the fact
5 that we have parent awareness, lockdown of
6 settings. We keep those settings as well just so
7 when the lock is lifted, those settings are still
8 in place.

9 Q. Okay. So you mentioned the settings
10 being in place.

11 Isn't it true that at one point in
12 time, if a child unlinked their account, their
13 privacy settings would automatically reset to
14 default?

15 A. That's correct. There was a bug
16 that we found where for a period of time there was
17 a reset, and we found it and we fixed it.

18 MR. RYDER: Okay. Let's pull
19 up tab 22. We'll mark this as
20 Exhibit 22.

21 (Document marked for
22 identification as TikTok-Tenenbaum
23 Exhibit 22.)

24 THE WITNESS: Thank you.

25 BY MR. RYDER:

1 Q. And let me know when you've had a
2 chance to review the document.

3 A. (Reviews document.)

4 Okay. Thank you. I'm ready.

5 Q. So this is a Lark chat between you
6 and Jordan Furlong; correct?

7 A. That's correct.

8 Q. I'm going to direct your attention
9 to page 7. This is the Bates number ending 132,
10 and let me know when you're there.

11 A. I got it. Thank you.

12 Q. Okay. Do you see that first message
13 on this page sent by you? It is dated December 2,
14 2022?

15 A. I do, yes.

16 Q. You say:

17 "Happy Friday everyone! I'm excited
18 to announce that we launched a pretty critical fix
19 to Family Pairing yesterday. Previously, any teen
20 who linked or unlinked with their parent would
21 have their privacy settings reset to default.
22 This meant 16+ year old users who had set their
23 accounts to private, disabled comments, or blocked
24 downloads of their videos would suddenly have
25 everything set public and open."

1 Did I read that correctly?

2 A. You did, yes.

3 Q. Did TikTok ever disclose this bug to
4 parents?

5 MR. COWAN: Form.

6 THE WITNESS: We don't have a
7 policy of disclosing bugs, to my
8 knowledge.

9 BY MR. RYDER:

10 Q. And that would be true for any bug
11 related to Family Pairing; correct?

12 A. Like I said, I'm not aware of any
13 disclosure policies relating to bugs in general.

14 Q. Okay. We can set that aside.

15 You mentioned earlier there was a
16 concern related to linking about whether TikTok
17 can verify the parent/child relationship; right?

18 A. You mean referring to a previous
19 document or to this document?

20 Q. I'm just asking you. We're not
21 talking about a document. Just in general.

22 We talked earlier, right, about you
23 and others at TikTok, there was a general concern
24 about the linking aspect of Family Pairing where
25 you didn't want to lock it down too tight because

1 A. Yes, that's what the document says.

2 Q. Next one says:

3 "Feature will not directly impact
4 night stay duration on platform level."

5 Did I read that correctly?

6 A. Yes.

7 MR. RYDER: You can set that
8 document aside.

9 Let's pull up tab 31, and
10 we'll mark this as Exhibit 31.

11 (Document marked for
12 identification as TikTok-Tenenbaum
13 Exhibit 31.)

14 THE WITNESS: Thank you.

15 BY MR. RYDER:

16 Q. And let me know once you've had a
17 chance to review it.

18 A. (Reviews document.)

19 Got it. Thank you.

20 Q. This document is titled "[A/B
21 Analysis] Enable Weekly Screen Time Updates for
22 Minors."

23 Do you see that?

24 A. I do, and just want to clarify that
25 I'm not the author of this document.

1 Q. Okay. And like the last exhibit,
2 this is a report on an A/B survey; right?

3 A. Yes, this is an A/B test result.

4 Q. Okay. But it's specific to the
5 Weekly Screen Time Update?

6 A. Based off of the title, this is for
7 enabling Weekly Screen Time Updates for minors.

8 Q. Okay. And you see the Executive
9 Summary on page 1; right?

10 A. I do.

11 Q. And if you go to the first bullet
12 point. My apologies. It says:

13 "The feature update for Enable
14 Weekly Screen Time Updates for Minors could
15 improve minor visibility of Screen Time
16 Management, and increase feature adoption rate."

17 Do you see that?

18 A. I do.

19 Q. Okay. And then there's a couple
20 bullet points down that starts with "While
21 improving visibility."

22 Do you see that?

23 A. I do.

24 Q. Okay. It says:

25 "While improving visibility and

1 adoption of screen time management, the update
2 does not have a negative effect on DAU, Stay
3 Duration, and Retention."

4 Did I read that correctly?

5 A. Yes, that's what it says.

6 Q. Does TikTok tell parents about
7 results like this?

8 MR. COWAN: Object to form.

9 THE WITNESS: To my
10 knowledge, it's not a practice to
11 disclose A/B test results publicly.

12 BY MR. RYDER:

13 Q. And that's true for any kind of
14 feature?

15 A. To the best of my knowledge, no.

16 Q. Okay.

17 A. We don't disclose A/B test results
18 publicly.

19 Q. Okay. So it's also true TikTok
20 doesn't disclose A/B test results for anything
21 related to Family Pairing; right?

22 A. Correct.

23 MR. RYDER: Okay. We can set
24 that exhibit aside, and let's pull up
25 tab 32.

1 THE WITNESS: Thank you.

2 (Document marked for
3 identification as TikTok-Tenenbaum
4 Exhibit 32.)

5 MR. COWAN: Is that 32 now?

6 THE WITNESS: Yeah.

7 MR. RYDER: Yes, Exhibit 32.

8 BY MR. RYDER:

9 Q. And, Mr. Tenenbaum, let me know once
10 you've had a chance to review this.

11 A. (Reviews document.)

12 Thank you. I'm ready.

13 Q. This is a document titled
14 "Post-Launch Report of Screentime Management
15 Upsell for Minors."

16 Do you see that?

17 A. I do, and want to clarify that I'm
18 not the author of this document, and also that
19 this scope of work was not under my remit at the
20 time that I was working on Family Pairing.

21 Q. Okay. This was produced to us by
22 TikTok as part of your custodial file.

23 Do you have any reason to dispute
24 that?

25 A. I was not part of that process.

1 Q. Okay. The metadata TikTok produced
2 also says this is dated November 11, 2022.

3 I'm going to direct you on the first
4 page about halfway down. There's a little bold
5 that says "Key summary."

6 Do you see that?

7 A. I do.

8 Q. I'll direct you to the bottom bullet
9 point on this page. It says:

10 "No negative impact on the average
11 session duration for minors."

12 Did I read that correctly?

13 A. Yes, that's what the document says.

14 Q. Okay. Again, this is relating to
15 the screen time limit feature; right?

16 A. Based off of this document, it's
17 referring to a feature that upsells Screen Time
18 Management tools to minors.

19 Q. Okay. So the feature designed for
20 Screen Time Management did not have any impact on
21 the average session duration for minors; right?

22 A. I might have to object to how you're
23 framing that question.

24 But, again, for this report the
25 bullet says here that there was no negative impact

1 to session duration. Beyond that, I can't
2 speculate as this wasn't my scope of work.

3 Q. That is what the document says;
4 right?

5 A. That's what this bullet says, yes.

6 Q. Okay. I'll redirect your attention
7 to page 7, which is going to be Bates ending 234.
8 And at the bottom of that page, there is a column
9 that says "Guardrail Metrics."

10 Do you see that?

11 A. I do.

12 Q. Okay. So, again, this is referring
13 to the guardrail metrics specific to this feature;
14 right?

15 A. I would assume so, yes.

16 Q. Okay. And then there's two bullet
17 points next to that, and the first one says "Stay
18 Duration"; correct?

19 A. That's correct.

20 Q. Okay. And next to that it says "No
21 statistically significant change"; right?

22 A. That's what it says, yes.

23 Q. So that means in this test, the
24 feature did not have any statistically significant
25 change on user stay duration; right?

1 A. It would appear based off of how
2 this table is set that is correct, but the table
3 is a little confusing. You'll have to give me a
4 second.

5 Q. Okay.

6 A. (Reviews document.)

7 Ah. Sorry. To clarify my answer,
8 it appears the table just shows based off of the
9 A/B experiment that there was no statistically
10 significant change for this, echoing that bullet
11 we were discussing earlier.

12 Q. We can set that exhibit aside.

13 So earlier we discussed whether
14 guardrail metrics had any relationship to revenue;
15 right?

16 A. You had raised the question around
17 that question, yeah.

18 Q. And you said that wasn't within your
19 realm of knowledge or responsibility; right?

20 A. My --

21 MR. COWAN: Form.

22 THE WITNESS: Sorry.

23 My responsibility was on the
24 features I was responsible for, and those
25 would have guardrail metrics defined for

1 those.

2 BY MR. RYDER:

3 Q. Okay. And for the features that you
4 worked on while you were the product manager for
5 Family Pairing, are you aware of any guardrail
6 metrics that were tied to TikTok's revenue?

7 A. Not to my scope of work, no.

8 Q. Okay. Let's go back to Exhibit 20.
9 This has already been produced.

10 A. Oh, yes. Sorry.

11 Q. Not to worry.
12 Let me know when you've had a chance
13 to re-review.

14 A. (Reviews document.)
15 Okay.

16 Q. All right. This is a Lark chat
17 between you and [REDACTED] right?

18 A. That's correct.

19 Q. Okay. And if you go to the top of
20 page 4, this is Bates 109.

21 It's a continuation of a message
22 from the previous page you sent on March 13, 2023.

23 Do you see that?

24 A. I do, yes.

25 Q. Okay. And on top of page 4, there's

1 Did I read that correctly?

2 A. Yes, that's what the message says.

3 Q. And then the second one that you
4 said and wrote to Jordan Furlong is: "Do we set a
5 global standard or do we localize?"

6 Do you see that?

7 A. Yes, that's what the message says.

8 Q. And then the last point that you
9 raised with Jordan Furlong was: "Do we allow
10 teens to adjust/disable this or is it locked?"

11 Is that -- did I read that
12 correctly?

13 A. Yes, that's what the message says.

14 Q. And ultimately TikTok does allow
15 muting of notifications, does it? Doesn't it?

16 A. Yes, that was one of the features we
17 later built in that year.

18 Q. But it does not lock muting of
19 notifications during school hours, does it?

20 A. We allow users and parents through
21 Family Pairing to customize the hours during which
22 notifications are muted.

23 Q. All right. Actually, I want to go
24 back to Exhibit 19, which you looked at previously
25 with Mr. Ryder.

1 MR. COWAN: Shoot. What
2 exhibit was this? No, the last one we
3 just looked at. What number?

4 MR. VERRIER: That was 36.

5 MR. COWAN: Thank you. I got
6 it.

7 BY MR. VERRIER:

8 Q. So this one is a Lark chat. At the
9 bottom, it bears the Bates number 22641.

10 You want to take a second to refresh
11 yourself?

12 A. Okay. Thank you.

13 Q. The second -- I want to direct your
14 attention to page 1.

15 Now, first off, this is a Lark chat
16 that you had with [REDACTED] is that right?

17 A. That's correct.

18 Q. And this was on May 8, 2023. The
19 chart -- the chat moves forward to June 12, 2023;
20 is that right?

21 A. That looks correct, yes.

22 Q. So on page 1, the second point down.
23 This is a May 8, 2023 message from you. You say:

24 "The weird data point is that 85% of
25 'teen' users are age gated 18+."

1 Did I read that correctly?

2 A. Yes, that's what this message says.

3 Q. So that means that 85 percent of
4 TikTok users who are actually teenagers under 18
5 indicate that they're 18 or older when they sign
6 up for TikTok; is that right?

7 MR. COWAN: Form.

8 THE WITNESS: No.

9 To clarify, what we were
10 discussing was a bit of exploration that
11 our data science did to consider what age
12 category users were for the two Family
13 Pairing roles.

14 I need to clarify that, at
15 this time, we had found this data point,
16 and shortly afterwards we uncovered some
17 tracking issues that make all of this
18 irrelevant.

19 The reason it turns out that
20 you see 85 percent is because we had an
21 issue with how this number was pulled
22 that mixed the labels for parent and
23 teen. Meaning this data has no -- is not
24 accurate at all.

25 BY MR. VERRIER:

1 Q. Well, putting aside any sort of
2 future evaluation you did, at the time you wrote
3 [REDACTED], you were accurately reporting to him
4 the data that you were looking at; is that right?

5 A. At the time, I was sharing the
6 results of that report, yes.

7 Q. And that report, when it says "age
8 gated 18+," that means that the user has -- is
9 over 18; is that right?

10 MR. COWAN: Form.

11 THE WITNESS: To clarify, in
12 this context, when we say "age gate," we
13 mean date of birth at registration is
14 18+.

15 BY MR. VERRIER:

16 Q. So if you consider the date of birth
17 at registration on TikTok, the user is now
18 currently 18+?

19 A. Correct. That's what this category
20 is referring to.

21 Q. And so when it says "85% of 'teen'
22 users are age gated 18+," it means that using the
23 data that was available to you when you wrote this
24 message, 85 percent were indicating an age of 18+;
25 is that right?

1 MR. COWAN: Object to form.

2 THE WITNESS: Now, what I'm
3 saying is that there's a weird data point
4 that showed that 85 percent of teen role
5 Family Pairing users were found to be age
6 gated over 18 years old.

7 BY MR. VERRIER:

8 Q. And [REDACTED] responds "LMAOOO."
9 I think he has seven Os, which I think we
10 understand probably to mean "laughing my ass off";
11 is that right?

12 A. I would assume so, yes.

13 Q. Yeah. And then he says in the next
14 line:

15 "'Cuz we are idiots to think a kid
16 these days will not cheat the system."

17 Did I read that correctly?

18 A. That's what the message says, yes.

19 Q. And by "cheat the system," he means
20 lie when they register and enter their date of
21 birth; right?

22 A. I can't say what was in [REDACTED] head
23 at the time, but I think it's a fair assumption.

24 MR. VERRIER: That's actually
25 all I have back from that document. Tab

1 CERTIFICATE OF REPORTER

2 DISTRICT OF COLUMBIA)

3 I, Denise Dobner Vickery, a
4 Registered Court Reporter and Notary Public of
5 the District of Columbia, do hereby certify that
6 the witness was first duly sworn by me.

7 I do further certify that the
8 foregoing is a verbatim transcript of the
9 testimony as taken stenographically by me at the
10 time, place and on the date herein set forth, to
11 the best of my ability.

12 I do further certify that I am
13 neither a relative nor employee nor counsel of
14 any of the parties to this action, and that I am
15 neither a relative nor employee of such counsel,
16 and that I am not financially interested in the
17 outcome of this action.

18
19
20
21 <%15207,Signature%>

22 DENISE DOBNER VICKERY, CRR,RMR
23 Notary Public in and for the
24 District of Columbia

25 My Commission expires: March 14, 2028

Exhibit 405B

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT Case No.
ADDICTION/PERSONAL INJURY 4:22-MD-03047-YGR
PRODUCTS LIABILITY LITIGATION MDL No. 3047

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

Coordination Proceeding Judicial Council
Special Title(Rule 3.550) Coordination Proceeding
SOCIAL MEDIA CASES No. 5255

This Document Relates to:
ALL ACTIONS

----- VOLUME II
VIDEO-RECORDED DEPOSITION OF MATTHEW TENENBAUM

Wednesday, January 29, 2025

10:02 AM

Job No.: 6966385

Reported by: Denise Dobner Vickery, CRR-RMR

1 actually --

2 MR. VERRIER: This is Exhibit

3 40.

4 (Document marked for
5 identification as TikTok-Tenenbaum
6 Exhibit 40.)

7 THE WITNESS: Thank you.

8 (Reviews document.)

9 BY MR. VERRIER:

10 Q. You can let me know when you've had
11 a chance to look at it.

12 A. Thanks.

13 (Reviews document.)

14 Yeah, I'm ready. Thank you.

15 Q. So this is a Lark chat between you
16 and a colleague that begins on November 16, 2022;
17 is that right?

18 A. It appears so. I can't make out the
19 name.

20 Q. Yeah. The name is in Mandarin
21 characters; is that right?

22 A. It appears so.

23 Q. Yeah.

24 A. But like I said, I can't read
25 Chinese.

1 Q. Okay. And from the context, we'll
2 see if you can figure out who you were talking to.

3 But in the meantime, if you could
4 look at the bottom of page 1, you are writing
5 about "an in-app upsell for Family Pairing."

6 Do you see that?

7 A. In that. Oh, yes.

8 Q. And you say that this is part of a
9 P00 project requested by Shou, Michael Beckerman,
10 and Sandeep Grover.

11 Do you see that?

12 A. I do.

13 Q. And who is Michael Beckerman?

14 A. Michael Beckerman is, to my
15 knowledge, our head of Public Policy.

16 Q. And who is Sandeep Grover?

17 A. Sandeep is our head of Trust &
18 Safety or head of Trust & Safety product, I should
19 say.

20 Q. And the P00 project they're
21 referring to -- I should say -- strike that.

22 The P00 project you're referring to
23 is Project M; is that right?

24 A. Based on the context, it would
25 appear so.

1 Q. And these are the executives who are
2 giving you the orders to expedite some of these
3 initiatives; is that right?

4 A. When I said the "executive-sponsored
5 project," I meant that there was a lot --

6 Q. Okay.

7 A. -- but these were the key
8 stakeholders to simplify it for sharing with
9 colleagues.

10 Q. Okay. And if I move ahead two
11 pages, if you'll take a look at the page that ends
12 in the Bates number 1893.

13 You'll see that at the very top you
14 write a note. It says "@Michael Beckerman."

15 Do you see that?

16 A. I do.

17 Q. Does that mean that this message is
18 going to Michael Beckerman?

19 A. No. It just means I've tagged him
20 for easier reference.

21 Q. Okay. So you write:

22 "Michael Beckerman and the TnS
23 leaders came together with Shou on 'Project M,'
24 which is a P00 project to ship a number of teen
25 safety -- safety safety features ASAP."

1 Did I read that right?

2 A. Yes, that's what the message says.

3 Q. And "TnS" is Trust & Safety; right?

4 A. That's correct.

5 Q. Okay.

6 "This upsell, which was a bit stuck,
7 became highly desirable because it is a very, very
8 loud way to build awareness around Family
9 Pairing."

10 Do you see that?

11 A. I do, yes.

12 Q. And when you note that it was "a bit
13 stuck," is that part of what you're discussing
14 when you say this allowed you to expedite certain
15 initiatives once you were into Project M?

16 A. No, actually.

17 For the upsell, one of the things
18 that we were thinking about was just how to best
19 target it, and so there was a lot of back and
20 forth on the question of how do we best implement
21 the targeting to maximize the impact.

22 Q. Looking to the next sentence:

23 "That's why it's a popup on the FYF
24 and not an inbox notification."

25 "FYF" means For You feed?

1 A. That's correct.

2 Q. "We're using both the upsell and the
3 targeting strategy as part of our discussions with
4 regulators."

5 Did I read that correctly?

6 A. Yes, that's what the message says.

7 Q. And then your colleague writes back:
8 "Is this due to the recent chaos in
9 U.S. news?"

10 Is that accurate?

11 A. That's what the message says.

12 Q. And you respond "Pretty much."

13 Did I read that correctly?

14 A. Yes, that's what the message says.

15 MR. VERRIER: Okay. You can
16 put that document aside.

17 (Document marked for
18 identification as TikTok-Tenenbaum
19 Exhibit 41.)

20 THE WITNESS: Thank you.

21 (Reviews document.)

22 I'm ready. Thank you.

23 BY MR. VERRIER:

24 Q. And this is a Lark chat between you
25 and Jordan Furlong, [REDACTED] and [REDACTED] on

1 February 15, 2023; is that right?

2 A. It appears so, yes.

3 Q. And the title of it is "Family
4 Pairing + P&S"; is that correct?

5 A. That's correct.

6 Q. What does the "P&S" stands for?

7 A. I believe it stands for privacy and
8 security.

9 Q. And if I could turn your attention
10 to on page 1 the very first entry by Jordan
11 Furlong at 17:51:51, he says in the last paragraph
12 of that post:

13 "In case you're unfamiliar,
14 Project M is a set of product changes we're making
15 as a way to demonstrate our commitment to minor
16 safety and wellbeing. We've been asked by
17 leadership to release these by March 23rd since
18 that's when Shou is testifying in front of
19 Congress."

20 Did I read that correctly?

21 A. Yes, that's what the message says.

22 Q. And right below it, you've seem to
23 have affixed an emoji to it.

24 Do you see that?

25 A. I do.

(Counsel conferring.)

MR. VERRIER: Can we go off
the record for a second?

THE VIDEOGRAPHER: The time is
10:37. We're going off the record.

(A recess was taken.)

THE VIDEOGRAPHER: Time is
10:38 AM. We're back on the record.

BY MR. VERRIER:

Q. Okay. We're handing you the next
document --

A. Thank you.

Q. -- which will be marked Exhibit 44.

(Document marked for
identification as TikTok-Tenenbaum
Exhibit 44.)

BY MR. VERRIER:

Q. First page bears the Bates number
ending in 1027303.

A. (Reviews document.)

Okay. I'm ready. Thank you.

Q. Okay. This is another Lark chat
between you and [REDACTED] This one
beginning on February 16, 2023; is that right?

A. That's right.

1 Q. And if I could turn your attention
2 to the -- it's really the message at the very
3 bottom of the first page from [REDACTED] at
4 February 17, 2023, and she says:

5 "Hello again! Wondering if you
6 could share the PRDs for the screentime limit in
7 the family pairing PRDs when you get a chance?
8 I'd also love to put in a monthly or bi-weekly for
9 us if you're up for it. USDS is trying to figure
10 out where we can be a partner to your team and
11 help advocate for pushing things through (under
12 the guise of U.S. compliance needs)."

13 Did I read that correctly?

14 A. That's what the message says, yes.

15 Q. And what is "USDS"?

16 A. You'll forgive me, I don't remember
17 exactly what it stands for, but they're our
18 U.S.-based organization that helps manage U.S.
19 user data.

20 Q. And then she continues:

21 "It seems like this congressional
22 hearing is making Shou piss in his pants (lol) and
23 so I want to strike while the iron is hot and
24 capitalize on this momentum to help advocate for
25 improvements in family pairing."

1 Did I read that correctly?

2 A. That's what her message says, yes.

3 Q. And you affixed a heart emoji to
4 this message; is that right?

5 A. That's correct.

6 Q. And if you could turn to the next
7 page, which ends with the Bates numbers 27305.
8 The second message down, [REDACTED] says:

9 "Does M stand for minor?"

10 And you answer "Haha yep."

11 Do you see that?

12 A. I do.

13 Q. And the next message from

14 [REDACTED] says:

15 "Hey Matt, I have an idea for the
16 addiction/screen time proposal for Project Aspen."

17 Did I read that correctly?

18 A. That's what the message says, yes.

19 Q. And what is Project Aspen?

20 MR. COWAN: Hold on. I need
21 to take a break because of a privilege
22 issue.

23 THE VIDEOGRAPHER: The time is
24 10:42 AM. We're going off the record.

25 (A recess was taken.)

1 CERTIFICATE OF REPORTER

2 DISTRICT OF COLUMBIA)

3 I, Denise Dobner Vickery, a
4 Registered Court Reporter and Notary Public of
5 the District of Columbia, do hereby certify that
6 the witness was first duly sworn by me.

7 I do further certify that the
8 foregoing is a verbatim transcript of the
9 testimony as taken stenographically by me at the
10 time, place and on the date herein set forth, to
11 the best of my ability.

12 I do further certify that I am
13 neither a relative nor employee nor counsel of
14 any of the parties to this action, and that I am
15 neither a relative nor employee of such counsel,
16 and that I am not financially interested in the
17 outcome of this action.

18
19
20 <%15207,Signature%>
21 DENISE DOBNER VICKERY, CRR,RMR
22 Notary Public in and for the
23 District of Columbia
24

25 My Commission expires: March 14, 2028