

AMENDED Exhibit 410

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION

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

Case No. 4:22-md-03047-YGR

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THIS DOCUMENT RELATES TO ALL
ACTIONS

**THE TIKTOK DEFENDANTS’
OBJECTIONS AND SECOND
SUPPLEMENTAL RESPONSES TO
PLAINTIFFS’ FOURTH SET OF
INTERROGATORIES**

PROPOUNDING PARTY: PI and SD Plaintiffs

RESPONDING PARTIES: TikTok Inc.; ByteDance Inc., TikTok Ltd., ByteDance Ltd.; and TikTok LLC

SET: FOUR

1 Plaintiffs' Interrogatories, their right to:

- 2 (a) Revise, amend, or supplement these responses;
- 3 (b) Object on any ground to the use of information or documents produced in
- 4 response to Interrogatories for any purpose, in whole or in part, in this or
- 5 any other proceeding, action, or matter;
- 6 (c) Object on any grounds, at any time, to other discovery procedures or
- 7 requests; and
- 8 (d) Object on the grounds of admissibility of any information or documents
- 9 produced in response to these Interrogatories.
- 10

11 **OBJECTIONS AND SECOND SUPPLEMENTAL RESPONSES**

12 **TO PLAINTIFFS' INTERROGATORIES**

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14 **INTERROGATORY NO. 2:** For each year in the Relevant Time Period, identify the

15 number of domestic TikTok users of Unknown Age, Non-Age Gate users, Hidden Minors, each

16 Reported Age between 0 and 100, and each Inferred Age between 0 and 100.

17 **Objections:** The TikTok Defendants object to this Interrogatory as compound and to the

18 extent it seeks discovery that is inconsistent with or enlarges the scope of permissible discovery

19 under the Federal Rules of Civil Procedure and/or applicable local rules. The TikTok Defendants

20 object to this Interrogatory as overly broad, unduly burdensome, disproportionate to the needs of

21 the case, and seeking information that is not relevant to any party's claim or defense because it

22 seeks information without regard to time, place, or a user's age. The TikTok Defendants object to

23 this Interrogatory as overly broad, unduly burdensome, and disproportionate to the needs of the

24 case to the extent it requires the TikTok Defendants to extract or recover data that is not reasonably

25 accessible or would require extraordinary costs and efforts to retrieve. The TikTok Defendants

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1 several steps, including but not limited to setting minimum age requirements for access to certain
2 product features, using restrictive default privacy settings, developing content levels to restrict
3 content that may not be suitable for people under the age of 18, and providing content filtering
4 options.

5
6 The TikTok Defendants are committed to enforcing the Platform's minimum age
7 requirements through several measures, including but not limited to training for the safety
8 moderation team, information provided by users, such as keywords and in-app reports from the
9 community, and account suspension when the safety team determines an account may belong to
10 an underage individual. To the extent other minor users have unlawfully accessed the TikTok
11 Defendants' services and avoided these measures through the use of deception, fraud, and other
12 improper conduct, including use of false identities and use of another's account without the
13 TikTok Defendants' authorization in violation of the TikTok Platform's Terms of Service, the
14 TikTok Defendants are unable to identify a reasonably accurate number of such users on the
15 TikTok Platform.

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17 (c) Number of Non-age gate users: Since 2019, the TikTok Defendants instituted a
18 neutral age gate that required users to provide their birthdate when signing up for the TikTok
19 Platform. Thereafter, the TikTok Defendants worked on ensuring active users had a reported
20 birthdate, with that process being completed in 2023 for the United States. As such, the TikTok
21 Defendants state that, outside certain rare exceptions (e.g., accounts on legal hold), there are no
22 active "Non-age gate" users on the TikTok Platform who registered their accounts in the United
23 States.

24
25 (d) Number of users of the TikTok Platform who registered their accounts in the
26 United States by age based on reported birthdate:

- 14-18:
 - 2016 – 3,072,850
 - 2017 – 3,967,701
 - 2018 – 6,963,107
 - 2019 – 17,464,173
 - 2020 – 33,564,915
 - 2021 – 40,402,460
 - 2022 – 44,034,038
 - 2023 – 42,920,560
 - 2024 – 40,967,065

- 19-24:
 - 2016 – 1,143,883
 - 2017 – 1,806,554
 - 2018 – 4,741,587
 - 2019 – 20,651,968
 - 2020 – 55,904,340
 - 2021 – 89,862,973
 - 2022 – 126,326,797
 - 2023 – 160,434,305
 - 2024 – 196,438,977

- 25-34:
 - 2016 – 727,028
 - 2017 – 1,094,675

1 2018 – 3,101,198
2 2019 – 10,345,603
3 2020 – 35,835,120
4 2021 – 64,026,699
5 2022 – 97,807,258
6 2023 – 136,747,141
7 2024 – 246,689,689
8
9 • 35-100:
10 2016 – 532,743
11 2017 – 833,439
12 2018 – 2,391,495
13 2019 – 7,951,146
14 2020 – 33,104,516
15 2021 – 65,416,273
16 2022 – 105,607,054
17 2023 – 147,501,711
18 2024 – 219,958,620
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21 Additionally, the TikTok Defendants state that as of July 2025 the number of users of the
22 TikTok Platform who registered their accounts in the United States with a discernable inferred age
23 level, as well as those users' age based reported birthdate, at the time of account registration is as
24 follows:
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26
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Age Range Classifier ²	Total Number of Users	Average Age - Reported DOB	Median Age - Reported DOB
1	10,315,177	27.1	22
2	11,251,337	24.7	21
3	84,006,527	21.4	20
4	180,826,180	28.6	27
5	154,270,729	49.1	46

INTERROGATORY NO. 3: For each year in the Relevant Time Period, identify by decile the Time Spent Per App Session for domestic TikTok users of ~~Unknown Age, Non-Age Gate users, Hidden Minors~~³, each Reported Age between 0 and 100, and each Inferred Age between 0 and 100.

Objections: The TikTok Defendants object to this Interrogatory as compound and to the extent it seeks discovery that is inconsistent with or enlarges the scope of permissible discovery under the Federal Rules of Civil Procedure and/or applicable local rules. The TikTok Defendants object to this Interrogatory as overly broad, unduly burdensome, disproportionate to the needs of the case, and seeking information that is not relevant to any party's claim or defense because it seeks information without regard to time, place, or a user's age. The TikTok Defendants object to this Interrogatory as overly broad, unduly burdensome, and disproportionate to the needs of the case to the extent it requires the TikTok Defendants to extract or recover data that is not reasonably accessible or would require extraordinary costs and efforts to retrieve. The TikTok Defendants object to this Interrogatory because of its use of the terms Time Spent Per App, Unknown Age, Non-Age Gate, Hidden Minors, and Inferred Age, for the reasons stated *supra*. The TikTok Defendants object to this Interrogatory as vague and ambiguous because Plaintiffs' instructions

² 1 = 15 or under, 2 = 16 to 17, 3 = 18 to 24, 4 = 25 to 34, 5 = 35 or above.

³ Following the December DMC, Plaintiffs withdrew Interrogatories 3-5 to the extent each sought information about Unknown Age users, Non-Age Gate users, and Hidden Minors. Therefore, the TikTok Defendants do not provide responses to those requests for information and have struck through the same for clarity.

PROOF OF SERVICE

I, the undersigned, declare: I am employed in the County of Fulton, State of Georgia. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 1180 Peachtree Street, NE, Suite 1600, Atlanta, GA 30309.

On **August 15, 2025**, I served a copy of the within document(s):

**THE TIKTOK DEFENDANTS' OBJECTIONS AND SECOND SUPPLEMENTAL
RESPONSES TO PLAINTIFFS' FOURTH SET OF INTERROGATORIES**

XX BY ELECTRONIC SERVICE VIA EMAIL: by transmitting via e-mail or electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

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I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on **August 15, 2025**, at Atlanta, Georgia.

/s/ Genêt B. Hogan
Genêt B. Hogan