

AMENDED Exhibit 422

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

US TikTok Mar-April OKRs

Top Level Objectives/General Objectives

Drive market growth: HL DAU 1.62M US market development; HL DAU 1.62M

01: Better understand our users/User research and understanding

02: Achieve user, content & product diversification/ User generalization, content generalization, gameplay generalization

03: Governance on US budget and ROI impact analysis / Optimize the budget expenditure of all the teams in the United States

04: Ensure safety & compliance / Safety and compliance

05: Team Building / Team building

Recap:

Goal/key agreements:

L2 male + L34; not change DAU goal at this moment; after testing the approach, can think about changing the goal to grow L2 male + L34 users.

UG, user growth: It is not simply targeting the age up group and is no longer limited to only introducing L34 / from the ug side, it does not exclude L2 male users during user acquisition.

The content side: meme, gaming, etc. We can consider expanding it if a lot of people like it/ content side: anything that a lot of groups like can be a target category.eg. meme, garni ng, etc.

Safety: We will continue to adhere to 18+ for UG materials / safety operations: UG assets should still make sure that assets are using 18+ creatives.

Status report

01: Understand our existing & target users/Research on current + target users

KR

P0: Understand existing users perception: those who download but churn fast or are less engaged / User Research:

Users who quickly churn after dowoloading TT [@Adam Wang Please coordinate and Plan]

Quantitative and qualitative results to clearly identify and align on top barriers for churn/lack

of engagement to execute on for perception and retention improvements with product & UG. / Through user research, we can obtain qualitative and quantitative insights, identify the core factors that affect user cognition and user retention, and convey them to product and UG for targeted improvements.

P0: to understand active TikTok users behavior / research: TT active users [Adam Wang Please coordinate and Plan] Quantitative and qualitative results to clearly identify and align on the top reasons that users stay to inform value prop & retention strategy / obtain qualitative and quantitative insights, identify the core factors for user activity, which will serve to guide our retention strategies and product value positioning.

Clearly defined user personas and use to inform our user targeting / clarify our user personas which will serve to guide our work in all the teams.

P1: to understand nonusers who have awareness but do not download the app / research: the group that knows about TT but does not download it [redacted team]

Quantitative & qualitative studies / Get qualitative and quantitative results.

Cumulative number results / total number results > what the results will look like

Should look at L2 users.

02: drive market growth through user, content & product diversification /generalization: generalization of the population, content, and gameplay

Objective: attract and retain users with proven high engagement to have a healthier age composition /Population

Generalization: Identify the people with high action rate and activeness, and realize the generalization of user groups

KR 1: **attract teen male users** (increase 1.9% to 2.1%, 167k -> 233k); gamers, meme users 265k -> 447k through Marketing programs and UG/Algo cold start tests. [redacted]

Key population groups to introduce: high school boys; game and emoticon enthusiasts.

KR 2: **identify new growth levers** that drive x % of installs (product, ug, marketing) / identify new measures and new methods for organic new growth and aggressively try out methods for new organic growth.

UG Growth Hacking contributes 1.28%-3% of organic installs; / new growth that contributes 1.28%-3% of the organic growth [redacted]

MKT content amplification (VIRUS) to achieve 250K new users, contribute 5.2%->7.9% of organic installs. Market innovation growth (virus special project) contributed 250,000 new additions, and the organic growth ratio from 15.2% -> 7.9%. [redacted]

Increase content sharing off platform: share rate +15%; share installs +10% [redacted] / Promote natural sharing: Sharing volume +15%; Sharing return +10%

Marketing growth levers (content amp, social, geo fencing) to drive 16.5% of organic install target (up from 13.3% jan-feb), ie 521,200 new users (including 250K of growth hacking -VIRUS), with HL% above 38% / various activities in the market [redacted]

KR 3: drive user retention / increase user retention [REDACTED]

Establish benchmark: HL UW 87.7 -> 97; FB D1 retention and D30 retention / identify data observation indicators and objectives: UVV of the age up group; FB session retention and 30-day retention indicators.

Improve HL new user retention from 19 > 20% (D7) and existing HL user DAU retention 73% > 75% / age up retention improvement 7-day retention 19 > 20%; age up DAU session retention 73% > 75%.

Age detection [REDACTED]

New user experience including content [REDACTED]

Fundamental user experience [REDACTED]

Objective: drive content diversification / content category generalization

KR expand our existing users preferred, tangential categories & those popular off-platform [Adam Wang/[REDACTED]

[REDACTED] / Expanding appeal to existing population groups, searching for vertical types that may appeal to interest groups as well as vertical types that have run viral outside the platform, but has not been popular within the platform.

Identify 3 tangential categories / Identify 3 vertical categories that may have room for expansion.

Grow each category by 2% vv through creators & publishers, programming, UG & algo. / each vertical category is built from scratch, with the goal of growing each vertical category by 2% vv.

KR: increase the creation of viral & meme content and amplify off-platform [REDACTED]

[REDACTED] / in-platform meme, creating viral content + off-platform amplification

In-app performance: 3 viral hashtags: 15M vv, 30k shares, 15k creates per hashtag; / 3 viral style challenges. Total hashtag engagement: 65M vv, 126k shares, 60k creates per month (50% MoM growth/month-on-month growth of 50% from the last month); challenging the overall on-platform performance goals;

Leverage trending hashtag content to amplify through marketing VIRUS Project, aiming to achieve 50M vv in total /

Off-platform amplification: Virus special project, contributing 50M VV

Objective: increase use case diversification & product adaptation / gameplay/product side function generalization

[REDACTED]
KR music diversification / music generalization []

Make sound/music pairing easier to increase the creation from uploading videos / optimizing the music accompaniment features.

Product feature diversification / Other product feature generalization: TikTok product roadmap discussion including discover 3.0 / discovery page reprint [REDACTED]

03 Governance on US budget and ROI impact analysis / US team budget and expense optimization [V Pappas]

KR Cross functional alignment (Marketing, UG, Content) on optimizing US spend and standardize ROI evaluation / Budget and financial review of all teams
Shared budget tracker for US spend / Joint budget tracking of all the teams in the United States
Estimate growth cases for different cost scenarios and make the optimal allocation of budget / Provide growth estimates for different cost scenarios and formulate rational payment investment methods (similar to the three investment forecasts of Douyin)

04 Ensure product Safety & Compliance / Safety Compliance [V Pappas]

KR success of FTC compliance: user adoption to 100% (iOS and Android) and sentiment from 53% to X% / Ensure FTC compliance: age-gate fully launched, public opinion maintained, product changes successfully launched [REDACTED]
KR Support GCDS on minor sexualization team hiring rollout CMS 20 / Support launching of the machine flagging tools for child sexualization [REDACTED]
KR Build the US Trust & Safety team, onboard Head of Safety Ops / Build the safety team and lead smooth onboarding.
KR Ads policy and UG policy processes streamlined, established [Tara Wadhwa]
KR updated UG assets policy and target sites; / updated UG material rules to ensure channel safety.
KR Brand Management & Operational Excellence: Ensure creative review process runs smoothly for all creative assets US consumers will see. Brand material review process

05 Team Building & Wellbeing / Strengthen Team Building [V Pappas]

KR Improved communication & info sharing between China & US / improved communication.
KR hire and onboard key roles for US market: / Continue to onboard key team members.
Safety Ops head, Marketing head, Online partnerships head, Ops head.

DECLARATION AND CERTIFICATION OF TRANSLATION

Pursuant to Government Code Section 27293

I, Howard Huang, declare that I am:

(Name of interpreter/translator)

☐

A Certified/Registered Court Interpreter as described in Section 68561 of the Government Code

☒

An Accredited Translator registered with the American Translator Association

I am certified/registered to interpret and translate from the Chinese language to the ENGLISH language.

I declare to the best of my abilities and belief that this is a true and accurate translation of the language text of
TIKTOK3047MDL-066-LARK-00983242.pdf
TIKTOK3047MDL-079-LARK-02159364.pdf
TIKTOK3047MDL-099-LARK-05010219.pdf

Specific Description of the Document

TikTok Internal communications

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Subscribed to this 6 th day of May, 2025, at Parker Colorado

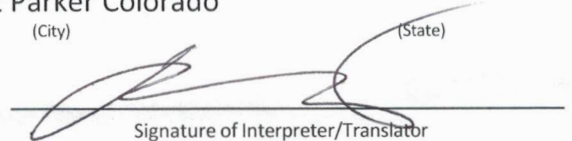
(Day)

(Month)

(Yr)

(City)

(State)



Signature of Interpreter/Translator

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

Certificate of Acknowledgement

State of Colorado County of Douglas

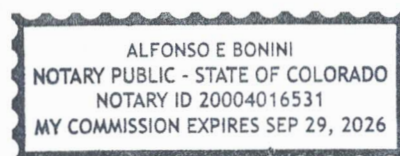
On 05-06-2025 before me, Alfonso E. Bonini
 (Insert name and title of the officer)

Personally appeared Howard Huang who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed, the instrument. I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

☐ Personally Known **OR** ☒ Produced Identification.

Type of Identification produced CO Driver License

WITNESS my hand and official seal




NOTARY SIGNATURE