

## **AMENDED Exhibit 427**

# **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

Wenjia Zhu

1

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA )  
 ADOLESCENT ADDICTION/PERSONAL )  
 INJURY PRODUCTS LIABILITY ) MDL No. 3047  
 LITIGATION )  
 )  
 \_\_\_\_\_ )  
 THIS DOCUMENT RELATES TO: )  
 ALL ACTIONS )

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

COORDINATION PROCEEDING ) Lead Case No.  
 SPECIAL TITLE [RULE 3.550] ) 22STCV21355  
 )  
 SOCIAL MEDIA CASES ) JCCP No. 5225  
 )  
 \_\_\_\_\_ )  
 THIS DOCUMENT RELATES TO: ) Judge:  
 ALL ACTIONS ) Carolyn B.  
 ) Kuhl, Dept.12

SATURDAY, MAY 24, 2025

CONFIDENTIAL - ATTORNEYS' EYES ONLY -  
 PURSUANT TO PROTECTIVE ORDER

☒ ☒ ☒

Videotaped deposition of Wenjia  
 Zhu, held at the offices of King & Spalding,  
 LLP, 1 Raffles Quay, #31-01 North Tower,  
 Singapore, commencing at 9:05 a.m., on the  
 above date, before Carrie A. Campbell,  
 Registered Diplomate Reporter, Certified  
 Realtime Reporter, Illinois, California &  
 Texas Certified Shorthand Reporter, Missouri,  
 Kansas, Louisiana & New Jersey Certified  
 Court Reporter.

☒ ☒ ☒

GOLKOW LITIGATION SERVICES  
 877.370.DEPS  
 deps@golkow.com

1 VIDEOGRAPHER: We are now on  
2 the record. My name is Vince Rosica.  
3 I'm a videographer for Golkow, a  
4 Veritext division.

5 Today's date is May 24, 2025,  
6 and the time is 9:05 a.m.

7 This video deposition is being  
8 held in 1 Raffles Quay, Singapore, in  
9 the matter of Social Media Adolescent  
10 Addiction Personal Injury Products  
11 Liability Litigation, for the United  
12 States District Court, Northern  
13 District of California.

14 The deponent is Wenjia Zhu.

15 Counsel will be noted on the  
16 stenographic record.

17 The court reporter is Carrie  
18 Campbell, and will now swear in the  
19 interpreter and our witness.

20  
21 WENJIA ZHU,  
22 of lawful age, having been first duly sworn  
23 to tell the truth, the whole truth and  
24 nothing but the truth, deposes and says on  
25 behalf of the Plaintiffs, as follows:

DIRECT EXAMINATION

QUESTIONS BY MR. MURA:

Q. Good morning, sir.

A. Good morning.

Q. My name is Andre Mura, and I  
represent the plaintiffs.

A. Okay.

Q. What is your name?

A. My name is Zhu Wenjia.

Q. Sir, we're sitting in person in  
Singapore.

Yes?

A. Yes.

Q. In the same building as  
ByteDance's office is.

Yes?

A. I'm not sure whether this is  
ByteDance office. I think it's a law firm,  
right.

Q. Is ByteDance a few floors below  
us?

MR. MATTERN: Object to form.

THE WITNESS: Yeah, we have  
several office both in the north tower  
and the south tower. I work in the

1 south tower, so I'm not sure how many  
2 for us in this north tower.

3 QUESTIONS BY MR. MURA:

4 Q. You understand that you're  
5 testifying under oath for a legal proceeding  
6 in US federal court?

7 A. Yes.

8 Q. Your testimony is being  
9 recorded and may be shown to a jury.

10 Okay?

11 A. Okay.

12 Q. Are you represented by counsel  
13 today?

14 A. Represented by counsel?

15 Q. Are you represented by an  
16 attorney today?

17 (Discussion with interpreter.)

18 INTERPRETER: I don't quite  
19 know how to answer this question.

20 Today we have the in-house company  
21 attorney, Will, here, and also David,  
22 but I am here to answer the questions  
23 on my own, so I don't know how to  
24 answer those question.  
25

1           A.       We don't have translators,  
2       yeah, so -- so all our conversations are in  
3       English.

4           Q.       Okay. So just to summarize,  
5       you met with your attorneys for about seven  
6       hours without a translator while reviewing  
7       documents in English, and that was about  
8       90 percent of the documents showed to you.

9                   Is that correct?

10          A.       Yeah.

11                   MR. MATTERN: Object to form.

12       QUESTIONS BY MR. MURA:

13          Q.       Sir, how did you learn English?

14          A.       I learn in school, yeah, from  
15       middle school to -- is that the question  
16       asked?

17          Q.       Yes. The question was, how did  
18       you learn English, sir.

19          A.       Yeah, just like any student in  
20       China. You know, we learn English in the  
21       middle school, high school and university,  
22       and they give us certification.

23                   And when I joined TikTok in  
24       2020, 2021 -- I'm sorry, 2021, 2022, I  
25       practice English around one hour per day

1 while listening to audio book.

2 Q. You mentioned going to school  
3 and a certification.

4 Did you get a degree or a  
5 certification?

6 A. I mean certification on  
7 English. They are called CET-4 and -- CET-4  
8 and CET-6. I get CET-6. That means around  
9 6,000 vocabulary, yeah.

10 Q. And you live and work in  
11 Singapore now?

12 A. During 2021 and '22, I mainly  
13 lived and worked in Singapore when I work for  
14 TikTok.

15 After that I think it's around  
16 50/50. I both will be in Singapore and in  
17 China.

18 Q. When did you first come to  
19 Singapore to work or live?

20 A. I think it's in the -- give me  
21 a second to think about that.

22 I think it's in the middle of  
23 2021.

24 Q. Do you speak English at work?

25 A. Only where I work in the

1 organization TikTok.

2 Q. And how often would you speak  
3 English at work at TikTok?

4 A. It depends. If my colleagues  
5 are Chinese, I speak Mandarin to them. If  
6 there are meeting, there are many native  
7 speakers, then I try to speak English.

8 Q. And when you would communicate  
9 with your TikTok colleagues who do not speak  
10 Chinese, when you would communicate with them  
11 in writing, would you write to them in  
12 English?

13 A. Yeah, sometimes I write English  
14 directly. Sometimes I write in Chinese  
15 document and someone will translate it for  
16 me.

17 Q. Have you ever given any talks  
18 to your colleagues in English?

19 MR. MATTERN: Object to form.

20 THE WITNESS: I should answer  
21 the question, correct?

22 Your question is, have I ever  
23 give English talk to my colleagues.  
24 Right?

25



1 QUESTIONS BY MR. MURA:

2 Q. Yes, any speeches.

3 A. Yes. Yes.

4 Q. Do you ever read news articles  
5 in English?

6 A. Not very often.

7 Q. What about technical papers?

8 A. Yeah, technical papers, mainly  
9 read English. I have to, yeah, read English.

10 Q. So you feel comfortable reading  
11 technical papers about machine learning or  
12 algorithms in English?

13 A. I feel, of course, much harder  
14 to read English document than Chinese  
15 document, but I don't have choice. So it's  
16 like I have to focus and spend several hours  
17 to go through a paper.

18 Q. And you have a master's degree  
19 in computer science.

20 Is that correct?

21 A. Yes.

22 Q. And you graduated in 2008?

23 A. Yes.

24 Q. From a university in China?

25 A. Yes.

1 Q. Sir, you've asked an  
2 interpreter to be here today.

3 Yes?

4 A. Interpreter, right.

5 Q. Yes.

6 A. Yes. Yeah.

7 Q. And you understand that this is  
8 an interpreter selected by your attorneys.

9 Correct?

10 A. Yeah.

11 Q. Do you trust that what the  
12 interpreter tells you is an accurate  
13 translation of what I say or read to you?

14 A. Yes.

15 Q. Sir, because you are able on  
16 some level, with some proficiency, to speak  
17 and read English --

18 A. Yeah.

19 Q. -- if you understand some of  
20 what I say and you think that it means  
21 something different than what the interpreter  
22 told you, will you please tell me?

23 A. Yeah, I will tell you.

24 Q. And if you're reading a  
25 document in English and the translator tells

1 you that part of the document means  
2 something, but you can read that document in  
3 English and you think it means something  
4 else, will you please let me know?

5 A. Yes.

6 (Zhu Exhibit 1 marked for  
7 identification.)

8 QUESTIONS BY MR. MURA:

9 Q. Vince, can we please pull up  
10 Tab 10? Or Tab 1?

11 Going too fast, David.

12 Sir, we're going to be handing  
13 you documents during the course of today, and  
14 I'll ask you some questions about them.

15 A. Okay.

16 Q. When you have a chance to  
17 review and you feel comfortable, I can start.

18 A. Yeah. Yeah.

19 But I think it's better let you  
20 know that although I can read English  
21 document, but I think I'm several times lower  
22 than native speaker. So it will take maybe  
23 more time than you expect.

24 Q. Okay. That's okay. And  
25 sometimes I will just ask you about a single

1 sentence.

2 A. Okay. Okay.

3 Q. So if you ever need more time,  
4 you can let me know.

5 A. Okay.

6 Q. And while you're reading that,  
7 sir, I'll just say some words for the record.

8 I'm marking this  
9 TIKTOK3047MDL-080-LARK-02855629 as Exhibit 1.

10 (Discussion with interpreter.)

11 INTERPRETER: I'm just telling  
12 the witness you're reading it for the  
13 record.

14 MR. MURA: Thank you.

15 QUESTIONS BY MR. MURA:

16 Q. Sir, if it helps, I'm only  
17 going to ask you about -- questions about --  
18 a few questions on the first page.

19 A. Okay.

20 Q. But this is a document that  
21 your lawyers gave to us.

22 Do you see on the very last  
23 page that it indicates that this document  
24 came from your files?

25 A. Yeah.

1 Q. Okay. And do you see on the  
2 very last page that the document indicates it  
3 was last modified in -- July 11, 2018?

4 A. Yes.

5 Q. Sir, what is this document?

6 A. I think that's a document where  
7 I maybe go to the Los Angeles office and try  
8 to help people outside the technical team to  
9 get entry level understanding of  
10 recommendation system.

11 Q. Do you see on the front page  
12 where you say, "Hello everyone, I'm Wenjia.  
13 You can call me Brad"?

14 A. Yeah.

15 Q. Do you go by Brad sometimes?

16 A. No. It's a kind of -- not a  
17 joke, but just to be -- not funny -- because  
18 I like Brad Pitt. So if I have to have  
19 English name, you can call me Brad, but I  
20 don't use that name in my work.

21 Q. And it says right below that,  
22 "Today, I'll give a talk about our  
23 recommendation system."

24 Do you see that?

25 A. Yes. Yes.

1 Q. And this speech was in English.

2 Is that correct?

3 A. Yes.

4 Q. It says you joined ByteDance at  
5 2015, July.

6 Do you see that?

7 A. Yes.

8 Q. Is that correct?

9 A. Yeah, it's correct.

10 Q. When you joined ByteDance in  
11 2015, it was to work on Toutiao, an app that  
12 aggregates or collects news.

13 Yes?

14 A. Yes.

15 MR. MATTERN: Object to form.

16 QUESTIONS BY MR. MURA:

17 Q. And do you see where it says,  
18 "Before I joined Toutiao"?

19 A. Yeah. Yeah.

20 Q. Then it says, "I worked for  
21 Baidu for seven years as the leader of the  
22 ranking team."

23 Yes?

24 A. Yeah. Yeah. To be more  
25 specific, I think well of the leader is more

1 accurate.

2 Q. What is Baidu?

3 A. It's the search engine company  
4 in China, the top search engine company,  
5 because there are several search engines  
6 other than Baidu.

7 Q. Is it fair to say that Baidu is  
8 the Google of China?

9 A. Yeah. I think it's fair to  
10 think that maybe before 2015. But nowadays,  
11 I think people begin to use other search  
12 engines as well. Some people use Douyin as  
13 the search -- video search engine. Some  
14 people use Huoshan.

15 Q. As a leader of the ranking  
16 team, did you determine how the algorithm  
17 ranked search results?

18 A. Actually, the -- the result of  
19 the search page is decided by signals and how  
20 it combine signals. So I think it's more  
21 accurate to say I design -- I design and  
22 improved several core component of the search  
23 engine. And these signals and how you  
24 combine them finally decided the result.

25 Q. When you joined ByteDance in

1 2015 and you worked on the Toutiao news app,  
2 did you also work on the ranking team?

3 MR. MATTERN: Object to form.

4 THE WITNESS: We do not call it  
5 the ranking team. We call it the  
6 algorithm team for recommendation  
7 engine. Or more simply,  
8 recommendation team.

9 QUESTIONS BY MR. MURA:

10 Q. So at Toutiao, you worked for  
11 the recommendation team?

12 A. Yes.

13 Q. And that refers to the  
14 recommendation algorithms?

15 A. Yes.

16 Q. And in that work, were you  
17 attempting to -- well, strike that.

18 The recommendation algorithm  
19 for Toutiao, does that personalize users'  
20 news feeds?

21 A. Yes.

22 Q. You continue -- do you see  
23 where it says, "2015 to 2017"?

24 A. I haven't see it on screen.

25 Q. It's a little up from where we



1 were looking.

2 A. Okay. I see it.

3 Q. And there it says, "I lead the  
4 recommendation and advertising algorithm  
5 teams for the product Toutiao."

6 Do you see that?

7 A. Yes.

8 Q. And that was from 2015 to 2017?

9 A. Yes.

10 Q. Is that accurate?

11 A. Yeah, it's accurate.

12 Q. And then it says, "2017 to  
13 now."

14 A. Yeah.

15 Q. And we looked before. This  
16 document was last modified in July 2018 --

17 A. Yeah.

18 Q. -- so does the "now" refer to  
19 July 2018?

20 A. Yes.

21 MR. MATTERN: Object to form.

22 QUESTIONS BY MR. MURA:

23 Q. So this would be 2017 to  
24 July 2018. "Our company decide to develop  
25 products on UGC video setup the IES group.

1 Then I lead the recommendation teams for  
2 IES."

3 Do you see that?

4 A. Yeah. Yeah.

5 Q. Does UGC mean user-generated  
6 content?

7 A. Yes.

8 Q. Does IES mean interactive  
9 entertainment social?

10 A. Yeah. I believe so, yeah,  
11 although I quite remember what that means.

12 Q. Let's pull up Tab 2, please.

13 MR. MURA: Can we go off the  
14 record?

15 VIDEOGRAPHER: The time is  
16 9:28 a.m. We are off the record.

17 (Off the record at 9:28 a.m.)

18 VIDEOGRAPHER: The time is  
19 9:31 a.m. We are back on the record.

20 (Zhu Exhibit 2 marked for  
21 identification.)

22 QUESTIONS BY MR. MURA:

23 Q. Can we please bring up Tab 2,  
24 which I'm -- which is TIKTOK3047MDL-158-LARK-  
25 08171764. We're marking it as Exhibit 2.

1 Sir, if it helps, I'm only  
2 going to ask you about one message, but  
3 you're free to look through it.

4 A. Okay.

5 Q. Sir, this is a Lark chat.

6 A. Okay.

7 Q. Is that correct?

8 A. I have no impression that I  
9 ever in that group.

10 Q. Can you look to the last page,  
11 sir?

12 A. Okay.

13 Q. Do you see your name listed as  
14 custodian?

15 A. Custodian.

16 Yeah, yeah, I see it.

17 Q. Okay. This is a document that  
18 came from your file, sir, and it's a Lark  
19 chat.

20 Correct?

21 A. That's Lark chat or a Lark  
22 document. It's a chat, not a document.

23 Right?

24 Q. Yes.

25 A. Okay. I think in company there

1 are many chat groups. I truly don't have any  
2 impression that I'm in that chat or I respond  
3 to anyone.

4 Q. Okay. But do you see that this  
5 came from Lark?

6 A. Yeah. Yeah. I see it.

7 Q. And you use Lark at work.  
8 Is that correct?

9 A. Yes.

10 Q. And did you use it to talk to  
11 your colleagues?

12 A. Yes.

13 Q. And to share documents?

14 A. Yes. Yes.

15 Q. And this is dated April 2021.  
16 If you just look at the first  
17 message, sir, do you see April 2021?

18 A. Yeah, give me a minute.

19 Usually we have a title for the  
20 group. You know, can -- how can I see -- see  
21 the -- the title for a group from -- from  
22 document?

23 Q. At the top, sir, do you see  
24 where it says ByteWord?

25 A. ByteWord, right.

1 Q. Sir, can I -- can I ask you to  
2 flip to the page where it says, "Title:  
3 IES"?

4 A. Okay. Okay. Yeah.

5 Q. Do you see the message at  
6 12:59:28, Title: IES?

7 A. Yes, yes.

8 Q. Do you see where it says,  
9 "Definition, IES is a product department of  
10 ByteDance"?

11 A. Yes.

12 Q. "IES is responsible for  
13 product, mainly short form" -- "mainly short  
14 video apps, development and maintenance of  
15 short video products across China and  
16 worldwide"?

17 A. Yes.

18 Q. And you were the leader of IES  
19 from 2017 to July 2018.

20 Correct?

21 A. I think I leaded the  
22 recommendation team for IES from -- from the  
23 beginning of 2017 to the beginning of 2019.

24 Q. Okay. So 2019?

25 A. Yeah. I think it's around

1 March in 2019. March.

2 Q. Do you see then that it lists  
3 main IES products?

4 A. Can you repeat the question?

5 Q. Yes.  
6 Do you see where it says "main  
7 IES products"?

8 A. Yeah, yeah, yeah, I see the  
9 words.

10 Q. And then it lists several, one  
11 of which is Douyin?

12 A. Yeah.

13 Q. Douyin is a short-form video  
14 app available in China?

15 A. Yeah. Yeah.

16 Q. It's not available in the  
17 United States?

18 A. Yeah.

19 Q. And then it lists international  
20 versions?

21 A. Yeah.

22 Q. And it lists TikTok.  
23 Yes?

24 A. Yeah, yeah, I see the words.

25 Maybe I need to add some

1 explanation here.

2 In the beginning of short-form  
3 video, or IES, both TikTok and Douyin are in  
4 the same department as explained by this  
5 definition.

6 But I think after certain -- I  
7 forget the date, maybe 2019 or 2020,  
8 that's -- I mean, the short-form video, like  
9 a Douyin question, they are still in the IES,  
10 but TikTok is a separate group.

11 But I forget date. Maybe we  
12 starting from 2019 or 2020.

13 Q. Okay. My only question, sir,  
14 is, this document refers to Douyin and other  
15 products in China and then refers to  
16 international versions and then lists  
17 VigoVideo and TikTok.

18 Correct?

19 MR. MATTERN: Object to form.

20 THE WITNESS: Yeah, you see the  
21 words here, but I think the  
22 explanation was written by some people  
23 in early times. So by the time 2021,  
24 it's not that case.

25

1 QUESTIONS BY MR. MURA:

2 Q. Let's return to Tab 10, please.  
3 Tab 1.

4 Sir, looking back to where it  
5 said 2017 to now.

6 A. Yeah, yeah.

7 Q. And you've clarified that you  
8 led IES until 2019.

9 A. Yeah, I leaded the  
10 recommendation team for IES, including TikTok  
11 algorithm team and Douyin's algorithm team,  
12 until 2019 March.

13 Q. Okay. And do you see that in  
14 this speech you gave, it also lists Douyin,  
15 TikTok, and in addition it lists Musical.ly?

16 Do you see that?

17 A. Yeah, yeah, I see that.

18 Q. And those are some of the  
19 products that you led?

20 A. Yes.

21 Q. Musical.ly? is a short-form  
22 video app that ByteDance acquired in 2018?

23 MR. MATTERN: Object to form.

24 THE WITNESS: I think it's in  
25 the end of 2016 -- give me a minute.



1 In the -- I think it's in the  
2 end of 2017.

3 QUESTIONS BY MR. MURA:

4 Q. 2017.

5 A. Yeah.

6 Q. You later became chief  
7 technology officer of Toutiao, the news  
8 aggregator app.

9 Correct?

10 A. Yeah. It's the 2019 March I  
11 transferred to the -- to the Toutiao  
12 department. I become that leader.

13 Q. And later you became CEO of  
14 Toutiao.

15 Correct?

16 A. Yeah. Yeah.

17 (Zhu Exhibit 3 marked for  
18 identification.)

19 QUESTIONS BY MR. MURA:

20 Q. Let's bring up Exhibit 3 --  
21 Tab 3, which we'll mark as Exhibit 3.

22 Sir, this is an article from  
23 KrASIA.

24 Yes?

25 A. I haven't readed the newspaper

1 in the past.

2 Q. Okay. And it's from  
3 April 2019?

4 A. Yeah, but I'm not familiar with  
5 this news, yeah.

6 MR. MATTERN: I just --

7 QUESTIONS BY MR. MURA:

8 Q. I'm sorry, November of 2019?

9 MR. MATTERN: I just want to  
10 note for the record, I think the  
11 witness said he hasn't read the news  
12 in the past.

13 THE WITNESS: Yeah, I didn't  
14 read the newspaper, so I -- yeah.

15 QUESTIONS BY MR. MURA:

16 Q. Okay. Do you see that this  
17 article is about you?

18 A. Yeah, yeah.

19 Q. And it's -- the title is  
20 "ByteDance's Toutiao welcomes new CEO  
21 following management reshuffle"?

22 A. Yeah, I see title.

23 Q. Okay. Do you see at the  
24 beginning of the article it has your name?

25 It says --

1 A. Yeah, yeah.

2 Q. -- "Zhu Wenjia, formally known  
3 as the CTO of Jinri Toutiao, the flagship  
4 news aggregator of the world's most valuable  
5 startup, ByteDance, delivered a speech this  
6 morning at a conference held by ByteDance as  
7 Toutiao CEO for the first time."

8 Do you see that?

9 A. Yeah, I see that, but I'm not  
10 formally the CTO of Jinri Toutiao. I just  
11 leaded the recommendation team.

12 Q. Okay. But the article is  
13 accurate that you became CEO.

14 Is that correct?

15 A. Yeah, that's correct.

16 Q. And then two paragraphs down,  
17 it says, "KrASIA reported earlier that," and  
18 then if you read on, it indicates, "Zhu would  
19 report directly to Zhang Yiming, the founder  
20 of ByteDance."

21 Do you see that?

22 MR. MATTERN: Object to form.

23 THE WITNESS: I'm not quite

24 sure. I think I reported to [REDACTED]

25 when I lead the Toutiao department.

1 QUESTIONS BY MR. MURA:

2 Q. And who is [REDACTED]

3 A. Yeah. [REDACTED] of course, was a  
4 colleague. I think she -- she was the leader  
5 for the IES team.

6 Q. Did you ever -- in that role,  
7 did you ever interact with Zhang Yiming?

8 A. Interact? Right. If interact  
9 means have some discussion on a regular  
10 basis, for example, maybe once per one week  
11 or two weeks, I think the answer yes.

12 (Zhu Exhibit 4 marked for  
13 identification.)

14 QUESTIONS BY MR. MURA:

15 Q. Let's pull up Tab 4, which  
16 we'll mark as Exhibit 4.

17 So we've marked this  
18 demonstrative as Exhibit 4. Sir, is this a  
19 picture of Yiming Zhang?

20 A. Yeah.

21 Q. And he's ByteDance's founder.

22 Is that correct?

23 A. Yes.

24 Q. And at the time, he was also  
25 CEO of ByteDance?

1 A. Which time?

2 Q. When you became CEO of Toutiao.

3 A. Yes.

4 But I think maybe it's in 2021

5 or sometime he -- he not CEO anymore. So

6 Rubo became CEO, but I forgetted the year.

7 Q. Okay. So for a time, he was  
8 the CEO of ByteDance?

9 A. 2019, right.

10 Q. Okay.

11 A. Yeah, I believe so.

12 (Zhu Exhibit 5 marked for  
13 identification.)

14 QUESTIONS BY MR. MURA:

15 Q. Can we pull up Tab 5, which  
16 we'll mark as Exhibit 5?

17 Sir, if you want to put that to  
18 the side, we're going to come back to those  
19 photos --

20 A. Okay.

21 Q. -- fairly frequently.

22 Sir, this is an article from  
23 the org.

24 Correct?

25 A. Sorry, what was the question

1 again?

2 Q. Do you see that it's an article  
3 from --

4 A. Yeah, yeah, yeah.

5 Q. -- the org?

6 A. But I haven't seen the news in  
7 this past.

8 Q. You haven't seen this  
9 particular article?

10 A. Yeah, yeah.

11 Q. The article is about you.  
12 Correct?

13 A. Yeah. It has my name on the  
14 title, yeah.

15 Q. Okay.

16 A. But it's the first time I see  
17 the document.

18 Q. Okay. Well, why don't we  
19 review it together and I can ask you some  
20 questions --

21 A. Okay.

22 Q. -- about it.

23 The article was published, it  
24 says, in -- or last updated February 15,  
25 2023.

1 Do you see that?

2 A. Yeah, I see that.

3 Q. And the title is "Zhu Wenjia  
4 will lead global research and development for  
5 TikTok."

6 Do you see that?

7 A. I see that, but it's not  
8 accurate.

9 Q. And what about it is not  
10 accurate?

11 A. I think ChatGPT was launched in  
12 the end of 2020, right? Yeah. So our  
13 company started a new -- new project, large  
14 language model. I transferred to that  
15 department in the beginning of 2023, but I  
16 forget the exact date. Maybe February or  
17 March.

18 And later, [REDACTED] take over my  
19 previous role and leaded the product team for  
20 TikTok.

21 Q. So the article in the first  
22 sentence says, "ByteDance is moving the CEO  
23 of their Chinese new platform, Zhu Wenjia, to  
24 Singapore, where he will lead global research  
25 and development for TikTok."

1 Do you see that?

2 MR. MATTERN: Object to form.

3 THE WITNESS: I see that, yeah,  
4 but I think it's wrong.

5 QUESTIONS BY MR. MURA:

6 Q. How would you describe your  
7 role when you moved to Singapore?

8 A. I moved to Singapore in 2021.  
9 During 2021, '22, I leaded the product team  
10 and the recommendation team for TikTok.

11 Q. So you would describe it as you  
12 led the product team and recommendation team  
13 for TikTok?

14 A. Yeah.

15 Q. Do you see where the article  
16 continues, it says, "In this" -- it's at the  
17 bottom of the first page, start of the second  
18 page.

19 "In this newly created  
20 position, Zhu will be overseeing and leading  
21 TikTok's product and technologies, including  
22 its recommendation algorithm."

23 Do you see that?

24 MR. MATTERN: Object to form.

25 THE WITNESS: Yeah, I see that.



1 But as I explained, I  
2 transferred to the new department, and  
3 I lead the language development  
4 model team, so I didn't work for  
5 TikTok anymore.

6 But I forget the date. Maybe  
7 the March or February, but it's in the  
8 first several months in 2023.

9 QUESTIONS BY MR. MURA:

10 Q. Okay. But you would agree that  
11 when you first moved to Singapore in 2021, it  
12 was to lead the product team and the  
13 recommendation team --

14 A. Yes.

15 Q. -- for TikTok?

16 A. Yes, yes.

17 Q. This article says that your new  
18 position, which you've described to us, "will  
19 be parallel to Vanessa Pappas, TikTok's  
20 interim head."

21 Do you see that?

22 MR. MATTERN: Object to form.

23 Also, just object to the use of this  
24 document given the witness has already  
25 identified a number of inaccuracies

1 with it.

2 MR. MURA: Well, that's the  
3 point of questioning, David.

4 THE WITNESS: Yeah, I think  
5 if -- if the sentence were in 2021,  
6 then it's -- it's -- it's right.  
7 Yeah.

8 QUESTIONS BY MR. MURA:

9 Q. Okay. When you say --

10 A. But both Vanessa and -- sorry.  
11 Both Vanessa and me reported to Shou at that  
12 time.

13 Q. Both you and Vanessa, you said,  
14 reported to?

15 A. The CEO of TikTok, Shou.

16 Q. Is it correct that you were  
17 both on the same level?

18 MR. MATTERN: Object to form.

19 THE WITNESS: Sorry, what's  
20 your question?

21 QUESTIONS BY MR. MURA:

22 Q. Is it correct that you -- the  
23 article is correct that you were parallel to  
24 Vanessa Pappas? You were on the same level?

25 A. Yes, because both of us

1 reported to Shou, yeah.

2 Q. Did you also report to Zhang  
3 Yiming?

4 MR. MATTERN: Object to form.

5 THE WITNESS: During 2021, '22,  
6 I reported to Shou.

7 QUESTIONS BY MR. MURA:

8 Q. Sir, you testified -- I want to  
9 ask you a few questions about your statement  
10 that you led the product team and  
11 recommendation team for TikTok.

12 Were you responsible for  
13 TikTok's product and technologies globally?

14 MR. MATTERN: Object to form.

15 THE WITNESS: Yes.

16 QUESTIONS BY MR. MURA:

17 Q. Did that include the United  
18 States?

19 A. Yes.

20 Q. And the TikTok product is the  
21 app.

22 Yes?

23 MR. MATTERN: Object to form.

24 THE WITNESS: Most users use  
25 TikTok by mobile app, but very few

1 people also use the PC version.

2 QUESTIONS BY MR. MURA:

3 Q. Did your responsibilities cover  
4 both?

5 A. Yes.

6 Q. Did your responsibility cover  
7 the various features of the app?

8 MR. MATTERN: Object to form.

9 THE WITNESS: We have several  
10 different product teams, including the  
11 user product, which I lead. And the  
12 monetization teams also have product  
13 team. So it's the trust and safety  
14 team.

15 So I think it's fair to say I  
16 cover maybe the majority of the  
17 features for TikTok, but not all.

18 QUESTIONS BY MR. MURA:

19 Q. Okay. Can you list those  
20 features for us?

21 MR. MATTERN: Object to form.

22 THE WITNESS: Yeah, it's just  
23 too much. I think, for example, the  
24 feeds, right, and all the features  
25 that you interact -- to most features

1 interact with users and the system  
2 settings, that's the scope of  
3 co-product teams, are not including  
4 the features for ads, for example,  
5 yeah, or for e-commerce.

6 QUESTIONS BY MR. MURA:

7 Q. So you said it's fair to say I  
8 cover maybe the majority of the features  
9 for --

10 A. Yeah.

11 Q. -- TikTok but not all?

12 A. Yeah.

13 Q. Maybe it's easier to ask. Do  
14 you remember which ones you didn't cover?

15 A. The features for monetization,  
16 the feature for e-commerce, and the feature  
17 for trust and safety.

18 Q. And in this role, were you  
19 responsible for overseeing and leading the  
20 technologies behind the TikTok platform?

21 MR. MATTERN: Object to form.

22 THE WITNESS: The recommend --  
23 I think the backhand in creating  
24 those -- the recommendation team, the  
25 ads team and the trust and safety

1 team, yeah, I covered the  
2 recommendation engine.

3 QUESTIONS BY MR. MURA:

4 Q. And did you have any other  
5 responsibilities in this role that we haven't  
6 discussed?

7 A. Do you mean on the technical  
8 side, right?

9 Q. On any side.

10 A. Maybe I actually mention that  
11 at that time, to engineering leader, Yiming  
12 reported to me as well, but I did not spend  
13 too much on his team. I relied on him to  
14 lead the engineering team.

15 Q. What is your role at the  
16 company today?

17 A. In 2023 and 2024, I lead the  
18 large language model team. They are both to  
19 build the foundation model and build and the  
20 new applications.

21 I think starting from the --  
22 the beginning of 2025, their new leader  
23 coming, so I lead the application team for  
24 large language model, but not the foundation  
25 model.

1 MR. MURA: He already testified  
2 that he attended these meetings and  
3 received these documents.

4 MR. MATTERN: And that  
5 mischaracterizes his testimony.

6 QUESTIONS BY MR. MURA:

7 Q. For the record, this is  
8 TIKTOK3047MDL-060-01167143, which we're  
9 introducing as Exhibit 10.

10 Sir, you testified previously  
11 that Yiming Zhang would distribute notes on  
12 company culture.

13 A. Yeah, it's at least before  
14 2019.

15 Q. Yes. Before 2019.

16 A. Yeah.

17 No, I remember before 2019,  
18 usually will give a speech in the beginning  
19 of the year to talk about the strategy for  
20 that year.

21 Q. And do you see the title of  
22 this is "Management Sharing: Interpretation  
23 of culture and management philosophy"?

24 A. Yeah, I see title.

25 Q. And do you see where it says,

1 "The contents in the document is derived from  
2 management's previous all-hands company  
3 anniversary and companywide memos. Yiming,  
4 Rubo and various business leaders shared  
5 their perspectives and insights into  
6 ByteDance as an organization, as well as our  
7 approaches toward decision-making, management  
8 philosophy and people management."

9 Do you see that?

10 A. Yeah, I see it.

11 Q. Is this an example of the notes  
12 that you were talking about before?

13 A. Yes.

14 Q. Does this document appear  
15 familiar to you?

16 A. The concept in the document,  
17 for example, in the first page -- sorry, the  
18 second page, always they want to be candid  
19 and clear, but this is familiar to me.

20 Q. And do you see on the first  
21 page where it says, "Updated on November 6,  
22 2023"?

23 A. Yes.

24 Q. And then right below that it  
25 says, "For internal reading only. External



1 use in any form is not allowed."

2 Do you see that?

3 A. Yeah, I see that.

4 Q. Can you turn to the page ending  
5 in 156?

6 A. Yes.

7 Q. Do you see the sentence right  
8 under the bolded sentence? It says, "The  
9 management principles are largely practices  
10 everyone has to follow."

11 Do you see that?

12 A. Yeah, I see that.

13 Q. And if you turn back a page,  
14 one page, do you see where this is -- it says  
15 "Yiming"? This is Yiming speaking?

16 A. On which page?

17 Q. The page before, sir. It's on  
18 the screen as well, sir.

19 A. Yeah.

20 Q. Do you see there where it says,  
21 "Develop a company as a product"?

22 A. Yeah, I see it.

23 Q. And here it says, "Yiming," and  
24 it continues, "I've always had this thought.  
25 Develop our company like building a product."

1 Do you see that?

2 A. Yeah, yeah.

3 I also heard him say that maybe  
4 in the first several years of the company.  
5 But I think in recent years I did not heard  
6 such words or sentences anymore.

7 Q. And then in the next paragraph,  
8 Yiming Zhang says, "We often say that a  
9 company needs input, such as capital, human  
10 resources and business opportunities, in the  
11 same way humans need air and food. The  
12 output is our vision, the goal we aspire to  
13 achieve."

14 Do you see that?

15 MR. MATTERN: Object to form.

16 THE WITNESS: I see that, but  
17 I'm not quite familiar about this  
18 paragraph.

19 QUESTIONS BY MR. MURA:

20 Q. And do you see where it says  
21 right below that, "Our business can be  
22 categorized into three parts"?

23 It's at the bottom of the page  
24 right below the --

25 A. Yeah, yeah.

1 Q. -- photo.

2 A. Yeah.

3 Q. And then it says -- the first  
4 part, it says, "User acquisition: Run by  
5 business development, public relations and  
6 user growth."

7 Do you see that?

8 MR. MATTERN: Object to form.

9 THE WITNESS: Yeah, I see the  
10 words.

11 QUESTIONS BY MR. MURA:

12 Q. And then, "2: User retention:  
13 Led by products, research and development and  
14 operation."

15 Do you see that?

16 MR. MATTERN: Object to form.

17 THE WITNESS: Yeah, I see the  
18 words.

19 QUESTIONS BY MR. MURA:

20 Q. And then, "3: Generating  
21 revenue." It says, "This is the  
22 responsibility of monetization products."

23 Do you see that?

24 MR. MATTERN: Object to the  
25 form.

1 THE WITNESS: Yeah, I see the  
2 words.

3 QUESTIONS BY MR. MURA:

4 Q. And then you see right below  
5 that it says, "With more active users, more  
6 clicks and better user satisfaction comes  
7 higher traffic, which is then turned into  
8 revenue. Together, these three parts form a  
9 closed loop within our business."

10 Do you see that?

11 MR. MATTERN: Object to form.

12 THE WITNESS: Well, I think  
13 the -- this talk maybe is not in 2020  
14 or 2021, right? It should be early  
15 talk, right?

16 QUESTIONS BY MR. MURA:

17 Q. Do you recall this being an  
18 early talk, sir?

19 A. Yeah, because here it's  
20 mentioned that more clicks, right. But in  
21 Douyin or TikTok, the interaction is not  
22 click. Click is the -- is the interaction  
23 with Toutiao.

24 So I believe it should be a  
25 early talk, maybe before 2019.

1 Q. Before 2019?

2 A. Yeah.

3 Q. So that would have been at the  
4 start of TikTok?

5 MR. MATTERN: Object to form.

6 THE WITNESS: I -- like I  
7 mentioned, the click is the  
8 interaction in Toutiao. I think that  
9 words maybe is for Toutiao.

10 But I think the whole process,  
11 for example, you get the users, and  
12 the user view get -- feel product  
13 interesting and useful, then we -- we  
14 have a system for other monetization  
15 system to gain revenue. I think the  
16 whole group is similar.

17 QUESTIONS BY MR. MURA:

18 Q. Let me see if I can summarize  
19 these three parts in this document about  
20 culture and management philosophy.

21 So to summarize, ByteDance's  
22 business can be categorized into three parts:  
23 user acquisition, user retention, and  
24 generating revenue.

25 Correct?

1 MR. MATTERN: Object to form.

2 Characterizes the document.

3 THE WITNESS: Yeah, I believe  
4 that's the common sense not in your  
5 company. It may be similar as other  
6 internet company -- internet company,  
7 too.

8 QUESTIONS BY MR. MURA:

9 Q. And each of those goals is  
10 related to growth.

11 Fair?

12 MR. MATTERN: Object to form.

13 THE WITNESS: I think growth is  
14 not the only goal. It's also about  
15 how to increase productivity, increase  
16 creativity of the user.

17 QUESTIONS BY MR. MURA:

18 Q. And increase DAU.

19 Correct?

20 MR. MATTERN: Object to form.

21 THE WITNESS: Yeah, these two  
22 goals in the long term, they align  
23 with each other, because if you make a  
24 product more useful, more interesting,  
25 then you get the more users.

1 came from your files, though?

2 MR. MATTERN: Object to form.

3 (Discussion with interpreter.)

4 THE WITNESS: It's just the  
5 wording and the phrase are not  
6 familiar to me, so I don't believe I  
7 wrote that document.

8 QUESTIONS BY MR. MURA:

9 Q. Sir --

10 A. Maybe we can search in the Lark  
11 system to see who first create the document  
12 and then how many people change the document.

13 Q. Well, sir, you may not have  
14 written it, but it came from your files, so  
15 that would mean that it was sent to you or  
16 shared with you at some point.

17 Fair?

18 MR. MATTERN: Object to form.

19 QUESTIONS BY MR. MURA:

20 Q. And you can see that on the  
21 last page where it says "custodian" and your  
22 name.

23 Do you see that?

24 A. Yeah, I see that.

25 Q. Okay. You don't disagree with

1 that?

2 A. I just feel surprised that  
3 why -- why the custodian is me, because I  
4 don't have impression on the document at all.

5 Q. Okay. Well, let's review the  
6 document.

7 Do you see the logo in the  
8 corner?

9 A. On which page?

10 Q. It's the logo in there.

11 A. Yeah, I see logo.

12 Q. Is that the Toutiao logo?

13 A. No. The left part is the  
14 Chinese character for Toutiao. The red part,  
15 I don't know what does that mean.

16 Q. So the left says Toutiao?

17 A. I'm sorry, what?

18 Q. The left character says  
19 Toutiao?

20 A. The left two characters,  
21 Chinese characters, means Toutiao.

22 Q. And the last page indicates  
23 this was last modified in February 2017.

24 Do you see that?

25 A. Yeah, I see that.



1 Q. And at that time, you were the  
2 chief technology officer of Toutiao.

3 Is that correct?

4 MR. MATTERN: Object to form.  
5 Characterizes testimony.

6 THE WITNESS: Yeah. As I  
7 mentioned, I lead Toutiao's  
8 recommendation team in 2015 and in  
9 2016. And then I transfer to IES, and  
10 I lead the IES recommendation team.

11 So in 2017, I'm not responsible  
12 for Toutiao's product team or  
13 committee team.

14 QUESTIONS BY MR. MURA:

15 Q. But for your work at IES,  
16 Toutiao was one of the products?

17 A. No, no, no. Toutiao is not one  
18 of the IES products.

19 Q. Not one of the IES products?

20 A. Yeah, yeah.

21 Q. But you were in charge of the  
22 other products?

23 A. In --

24 Q. Douyin and TikTok?

25 MR. MATTERN: Object to form.

1 THE WITNESS: Yeah, and many  
2 short-form videos.

3 QUESTIONS BY MR. MURA:

4 Q. Okay. So this is a PowerPoint  
5 reviewing how one of ByteDance's companies  
6 uses ads to generate revenue.

7 Correct?

8 MR. MATTERN: Object to form  
9 and foundation.

10 THE WITNESS: Can you repeat  
11 the question again?

12 QUESTIONS BY MR. MURA:

13 Q. So this PowerPoint contains an  
14 overview of how one of ByteDance's companies  
15 uses ads to generate revenue.

16 Correct?

17 MR. MATTERN: Same objections.

18 THE WITNESS: I think that -- I  
19 think I don't have any -- any  
20 impression for document. But based on  
21 the content of the document, I think  
22 it's just some common sense about --  
23 about ads.

24 QUESTIONS BY MR. MURA:

25 Q. Okay.

1           A.       It looks like to -- to -- the  
2 entry level introduction as to the people not  
3 working on ads team.

4           Q.       Okay. So the title is "Ads  
5 Growth." And then if you look at the first  
6 two slides --

7           A.       Okay.

8           Q.       -- they discuss supply and  
9 demand for ads.

10                   Do you see that?

11          A.       Yeah, I see that.

12          Q.       So let's look at the first  
13 slide.

14                   Do you see where it says,  
15 "Increasing demand"?

16          A.       Yeah.

17          Q.       And then it says, "Advertiser  
18 acquisition"?

19          A.       Yeah.

20          Q.       Demand for advertisements  
21 increases the more advertisers you have.

22                   Would you agree?

23                   MR. MATTERN: Object to form  
24 and foundation.

25                   THE WITNESS: Which sentence?

1 QUESTIONS BY MR. MURA:

2 Q. I'm just asking you a question,  
3 sir.

4 A. Yeah.

5 Q. The demands for advertisements  
6 increases the more advertisers you have.

7 Would you agree?

8 MR. MATTERN: Object to form  
9 and foundation.

10 THE WITNESS: Yeah, I think it  
11 means you need a sales team to -- to  
12 reach advertisers, to persuade them to  
13 put budget on platform.

14 QUESTIONS BY MR. MURA:

15 Q. And the next slide discusses  
16 increasing supply of ads.

17 Do you see that?

18 A. I see that.

19 Q. And just explain to the jury,  
20 the supply of ads means how many ads can be  
21 shown on the platform.

22 Yes?

23 MR. MATTERN: Object to form  
24 and foundation.

25 THE WITNESS: According to the

1 QUESTIONS BY MR. MURA:

2 Q. So user growth means more  
3 active users?

4 A. Yeah. But some -- yeah.  
5 Because if the user is not active or the  
6 retention is extremely low, then you cannot  
7 grow DAU or MAU at all.

8 Q. More users, more active users,  
9 means more people to see the ads.

10 Is that correct?

11 MR. MATTERN: Object to form.

12 THE WITNESS: I would say -- I  
13 would say that's usually correct.

14 QUESTIONS BY MR. MURA:

15 Q. And third is "Increased user  
16 engagement, time spending."

17 Yes?

18 A. I think from the document it  
19 say -- it says if you have more users and the  
20 user spend more time on your app or on your  
21 product, then you have more placement for  
22 ads.

23 Q. Okay. So that means the more  
24 time people spend on the app, the more  
25 opportunity to show them ads?

1 MR. MATTERN: Object to form.

2 THE WITNESS: No, it's much  
3 broader. I think the purpose is to  
4 get a firsthand information about how  
5 a user feel about our product.

6 (Zhu Exhibit 15 marked for  
7 identification.)

8 QUESTIONS BY MR. MURA:

9 Q. Let's pull up Tab 17, which  
10 we're marking as Exhibit 15. This is  
11 TIKTOK3047MDL-236-04863562.

12 MR. MURA: Let's go off the  
13 record for a minute.

14 VIDEOGRAPHER: The time is  
15 12:53 p.m. We are off the record.

16 (Off the record at 12:53 p.m.)

17 VIDEOGRAPHER: The time is  
18 1:02 p.m. We are back on the record.

19 QUESTIONS BY MR. MURA:

20 Q. Sir, this is a document titled  
21 "US TT street interview notes."

22 Do you see that?

23 A. Yeah. I have go through this  
24 document, and I feel I have impression about  
25 this interview. But I think the date is

1 either in 2019 or before 2019.

2 Q. And this document came from  
3 your files.

4 Any reason to dispute that?

5 A. It -- I didn't wrote -- write  
6 the full document, but I think I participate  
7 in the street interview. And I think we go  
8 to several cities, and in each city we  
9 interview maybe 10 or 20 or even more  
10 users -- sorry, sorry. Not necessary users.  
11 Random people, yeah.

12 Q. When a document is found in  
13 your files, sir, it could mean that you  
14 authored it, but it could also mean that  
15 someone sent it to you or shared it to you.

16 Yes?

17 MR. MATTERN: Objection to  
18 form.

19 THE WITNESS: I think in the  
20 Lark document they have a rule. For  
21 example, maybe the author write a  
22 document, create a document. Later,  
23 the author give the company. Then the  
24 custodian, right, will change it to  
25 maybe his plus 1.

1                   That's why -- maybe that's why  
2                   the -- you raise several document. I  
3                   have no impression whether the  
4                   custodian is me. I think it could be  
5                   created in this way.

6       QUESTIONS BY MR. MURA:

7           Q.       Are these notes on a trip that  
8       you took?

9           A.       We divide into different  
10       groups. So every groups will do their  
11       interview, and then later we will combine  
12       information together.

13       Q.       So is that a yes?

14       A.       I wrote part of the notes, not  
15       all notes.

16       Q.       Sir, do you know who Drew  
17       Kirchhoff is?

18       A.       Yes, I think he -- he's -- at  
19       that time, I think he's on the product team.

20       Q.       And he's a colleague of yours.  
21       Yes?

22       A.       Yes. Yes.

23       Q.       If you pull up Tab 4 --

24       A.       Okay.

25       Q.       -- Exhibit 4, the picture book,



1 sir.

2 Vince, if you could pull up

3 Tab 4.

4 A. A picture book. Right. Okay.

5 Q. If you can look at slide 3.

6 A. Yeah, yeah. I know him, yeah.

7 Q. The individual on the screen,  
8 that's Mr. Kirchhoff?

9 A. Yes.

10 Q. Mr. Kirchhoff was deposed in  
11 this case.

12 Were you aware of that?

13 A. Yeah, yeah.

14 Q. Are you aware that  
15 Mr. Kirchhoff testified under oath that you  
16 and V Pappas took a trip to the US to  
17 interview random strangers on the street  
18 about TikTok?

19 MR. MATTERN: Objection to  
20 form.

21 THE WITNESS: Yeah, like I  
22 mentioned, I attend such interviews  
23 several times in US.

24 QUESTIONS BY MR. MURA:

25 Q. Are you aware that

1 Mr. Kirchhoff testified that one of the  
2 purposes of the trip was to figure out how to  
3 accelerate TikTok's US growth among high  
4 school males, athletes and popular kids?

5 MR. MATTERN: Objection to  
6 form.

7 THE WITNESS: You mean do I  
8 know he testified the purpose of  
9 the -- okay.

10 I think the purpose of the  
11 street interview is to get a firsthand  
12 experience about everything about the  
13 TikTok, not just the growth in -- like  
14 he mentioned, high -- high school  
15 males, right? It's, I think, broader  
16 than that.

17 QUESTIONS BY MR. MURA:

18 Q. You think it's broader than  
19 that, but it would encompass growth.

20 Fair?

21 MR. MATTERN: Object to form.

22 THE WITNESS: To accelerate  
23 growth, right. I think to accelerate  
24 growth is just a part of the reason.  
25 We want to know from the user's view,

1 right, or nonuser's view what TikTok  
2 is and then try to figure out how to  
3 improve it.

4 QUESTIONS BY MR. MURA:

5 Q. And Mr. Kirchhoff testified  
6 that one of the purposes of the trip was to  
7 focus on males, high school males.

8 MR. MATTERN: Objection to  
9 form.

10 THE WITNESS: I'm not sure,  
11 yeah.

12 Yeah, from my point of view, I  
13 just think we need to get more diverse  
14 content from more diverse user groups,  
15 not just high school males. It sound  
16 too narrow.

17 QUESTIONS BY MR. MURA:

18 Q. But that was part of it.

19 Yes?

20 MR. MATTERN: Objection to  
21 form. Asked and answered.

22 THE WITNESS: Yeah. If the  
23 whole purpose is to get a better  
24 understanding of the TikTok, then high  
25 school males are of course part of it.

1 please? All the way at the bottom of that  
2 page.

3 A. 566, right.

4 Q. Yes, sir.

5 There it says, "Interviewee 6:  
6 Three males, one female, 14 years old."

7 Do you see that?

8 A. Yeah, I see it, yeah.

9 Q. On the next page, also at the  
10 bottom of the page, do you see where it says,  
11 "Interviewee 8: Two males, 17/18 years old,  
12 seniors in high school"?

13 A. Yeah, I see it, but I think I'm  
14 not in the same group as them.

15 Q. And do you see on the next  
16 page -- or, I'm sorry, the page ending in  
17 573, there it says, "Interviewee 1: Male  
18 16-year-old"?

19 A. Yeah.

20 Q. Do you see that?

21 And then on 597, do you see it  
22 says, "Interview 3: Group of high school  
23 juniors in the surrounding Houston area"?

24 Do you see that?

25 MR. MATTERN: Objection to

1 form.

2 THE WITNESS: Yeah, I see that.

3 QUESTIONS BY MR. MURA:

4 Q. Can you turn to 601, please?

5 At the top of the page?

6 A. Yeah.

7 Q. And there it says, "Interview  
8 1: Group 6 of female eighth graders."

9 Do you see that?

10 A. Yeah, I see that.

11 MR. MATTERN: Objection to  
12 form.

13 It also says, "and three moms  
14 in their early 40s."

15 QUESTIONS BY MR. MURA:

16 Q. And it also says, "and three  
17 moms"?

18 A. Yeah, I think that is the  
19 interview I -- I -- actually I participated.  
20 We -- we -- Adam and Drew.

21 Q. So you recall speaking to a  
22 group of six female eighth graders?

23 A. Yeah, I think I meet them maybe  
24 in -- in some mall, yeah. There's three mom  
25 and maybe three -- three -- their daughters.

1 And then ask them for their suggestions or  
2 advice.

3 Q. And then if we turn to  
4 page 613, do you see where it says,  
5 "Interview 1: 13-year-old male"?

6 MR. MATTERN: And it also says,  
7 "aware, not a user."

8 THE WITNESS: Yeah, I'm not in  
9 that group.

10 And I want to also add some  
11 explanation here that we don't select  
12 interviewers based on their age. For  
13 example, all the interviewers under  
14 18, we don't do that. Because on  
15 document I -- I think you can easily  
16 find interviewees above 20.

17 We just wanted to give a -- get  
18 a whole understanding of the entire  
19 users, yeah, no matter he older --  
20 older than maybe 14, 16 or under 20.  
21 We want to get impression about how  
22 they think about TikTok.

23 I could even remember that I --  
24 I see a person maybe over 30, and he  
25 told me one of his, maybe, nephew or

1 Do you see where it says,  
2 "Interviewee 3: 13-year-old female, aware,  
3 previous Musical.ly? user"?

4 A. I think I'm not in that group.  
5 Yeah, so -- so I -- I don't know that --  
6 whether -- what kind of users they would  
7 pick.

8 Q. Sir, you mentioned this was a  
9 common practice of TikTok.

10 How often did TikTok employees  
11 troll the streets for kids to increase growth  
12 on the TikTok app?

13 MR. MATTERN: Objection to  
14 form. Characterizes testimony.

15 THE WITNESS: Just as I  
16 mentioned, we did not only pick young  
17 users. We tried to interview random  
18 users.

19 And you also asked the  
20 frequency. Right? I think we did it  
21 on a yearly basis.

22 (Zhu Exhibit 16 marked for  
23 identification.)

24 QUESTIONS BY MR. MURA:

25 Q. Let's go to Tab 18, please.

1                   This is Exhibit 16, and it's  
2                   TIKTOK3047MDL-004-00290427.

3                   Sir, if you see on the last  
4                   page, you're a custodian of this document.

5                   Yes?

6                   A.       Yes.

7                   Q.       And you see that the document  
8                   was created May 5, 2022?

9                   A.       Yes.

10                  Q.       Do you recognize this document?

11                  A.       Yes.

12                  Q.       What is it?

13                  A.       It just seems we have internal  
14                  debate about how we design a strategy for all  
15                  user experience for under 13 model.

16                         I think at that time our  
17                  strategy is to build a kids model kids mode  
18                  if the user is under 13. In the kids mode,  
19                  all the content strictly moderated by third  
20                  party, and the content pool is very small to  
21                  ensure safety.

22                         But someone propose an even  
23                  aggressive -- more aggressive idea is to  
24                  remove all the users under 13. So I think I  
25                  wrote the document to express my thoughts.



1 Q. The title of this document is  
2 "U13 model."

3 Do you see that?

4 A. Yeah.

5 Q. And it says, "If we promise to  
6 remove all U13 users, the internal/external  
7 pressure would eventually make it truly  
8 happen."

9 Do you see that?

10 A. Yeah.

11 Q. And U13 means under 13?

12 A. Yes.

13 Q. A U13 model, is that an AI  
14 model trained to identify under 13-year-old  
15 users on the TikTok app?

16 A. I think in the TnS team, there  
17 is a model to category user into four groups  
18 named L1, L2, L3.

19 But I forget the threshold. L1  
20 maybe means under 14 or under 15.

21 Yeah, so I'm not -- I can't  
22 remember whether there is a under 13 model.

23 Q. What did you mean when you  
24 wrote "U13 model"?

25 A. If -- sorry, I cannot remember

1 but the feed is different.

2 QUESTIONS BY MR. MURA:

3 Q. Yes. I'm not asking about kids  
4 mode.

5 A. Yeah, yeah, yeah.

6 Q. I'm asking about the regular  
7 TikTok app that you and I --

8 A. Yeah.

9 Q. -- could access.

10 A. I mean, the app is the same,  
11 but the experience and the feed is different,  
12 yeah.

13 Q. Okay. So children under 13 are  
14 not supposed to have that experience?

15 A. Yes. Yes.

16 Q. Okay. In the United States?

17 A. Yeah.

18 Q. The document says, "If we  
19 promised to remove all U13 users, the  
20 internal/external pressure would eventually  
21 make it truly happen."

22 Do you see that?

23 A. Yeah. I think I means if we  
24 make -- make a promise, say, not only we  
25 present into kids mode, we will remove them.

1 If we say it, then we need to do it finally.

2 Q. And under platform it says,  
3 "Pros, probably better reputation before  
4 regulators."

5 Do you see that?

6 A. Yeah. I mean, if we have no  
7 underage users, for example, user under 13,  
8 then I think there will be less news about  
9 us.

10 Q. And when you say "news about  
11 us," can you explain --

12 A. Bad news.

13 Q. There was bad news about  
14 TikTok?

15 A. Yeah. I have seen some news  
16 about teenagers. They have a concern that  
17 teenagers may have a bad experience on  
18 TikTok.

19 But if we don't have young  
20 users, then this news will disappear.

21 Q. And then it says, "Cons."

22 Do you see that?

23 A. Yes.

24 Q. "Less DAU."

25 Do you see that?

1 A. Yeah.

2 Q. So according to the documents  
3 that you wrote, if TikTok were to finally  
4 remove all children under 13 from the main  
5 TikTok experience, the nonkids mode, there  
6 would be a downside.

7 Yes?

8 MR. MATTERN: Object to form  
9 and characterizes the document.

10 THE WITNESS: Through some  
11 interviews, some adults told me  
12 that -- that the way they get to know  
13 TikTok is because their children use  
14 TikTok.

15 So I think if the overall  
16 experience in kids mode is safe  
17 enough, it's better we let the user  
18 use the app, yeah, so the parents can  
19 know the TikTok as well.

20 QUESTIONS BY MR. MURA:

21 Q. Sir, I'm not asking about kids  
22 mode.

23 A. Okay.

24 Q. I'm asking about the regular  
25 TikTok experience.

1 A. Yeah, the young -- okay.

2 Q. This document is saying that if  
3 you promise to remove all U13 users, right --

4 A. Yeah.

5 Q. -- and you succeeded in that,  
6 one of the cons would be less DAU.

7 Yes? That's what this document  
8 says?

9 MR. MATTERN: Objection to form  
10 and characterizes the document.

11 THE WITNESS: Yeah, I think  
12 that means -- remove means let them  
13 totally cannot use the app at all.  
14 Yeah, I think it's too restrictive  
15 because kids mode is safe enough.

16 QUESTIONS BY MR. MURA:

17 Q. Okay. Let's put aside kids  
18 mode.

19 Okay?

20 A. Yeah.

21 Q. You wrote here that one of the  
22 cons would be less DAU if under 13-year-old  
23 users are no longer accessing the main TikTok  
24 experience.

25 Yes?

1 response about your testimony?

2 A. You mean -- David didn't  
3 respond anything, right? I think he just  
4 said it's normal break.

5 Q. Okay.

6 A. Yeah.

7 Q. I'll caution you on breaks that  
8 because we're continuing this process, not to  
9 talk about the substance of your testimony.

10 A. Okay. Okay.

11 (Zhu Exhibit 29 marked for  
12 identification.)

13 QUESTIONS BY MR. MURA:

14 Q. Let's pull up Tab 29. And we  
15 already introduced this as Exhibit 29,  
16 TIKTOK3047MDL-153-LARK-07425095.

17 Sir, I'll represent to you that  
18 this document was produced to us by the  
19 lawyers from your files.

20 A. Okay.

21 Q. Do you see that listed on last  
22 page, your name?

23 A. Yeah, I see my name, but I  
24 think it's written by someone from the TnS  
25 team.

1 Q. Okay. But it was sent to you,  
2 so it was in your files.

3 A. Okay.

4 Q. If you turn to the last page,  
5 also, do you see where it says, "Created and  
6 modified"?

7 A. Yeah.

8 Q. And do you see the date is  
9 July 20, 2021?

10 A. Yes.

11 Q. So looking back at the first  
12 page, the title is "T&S Digital Wellbeing  
13 Product Strategy."

14 Do you see that?

15 A. Yes.

16 Q. Are you familiar with this  
17 document?

18 A. I have some memories about the  
19 document. I think I have seen it before, but  
20 I can't remember all the details of the --  
21 the document.

22 Q. And is it fair to say that this  
23 document outlines several feature changes  
24 designed to improve user well-being?

25 MR. MATTERN: Object to form.

1 Characterizes document.

2 THE WITNESS: Yeah, let me look  
3 at -- yeah, I just quickly scan  
4 document. I don't think they proposed  
5 many details. The only details I have  
6 seen is that screen time measurement.

7 Other than that, it seems to  
8 look like maybe a high-level principle  
9 or high-level ideas. But I don't see  
10 too many features, special features,  
11 on the document.

12 QUESTIONS BY MR. MURA:

13 Q. Okay. But this is a document  
14 about well-being, digital well-being product  
15 strategy.

16 Yes?

17 A. Yes.

18 Q. Do you see on the page ending  
19 in 099 it says, "FAQ"?

20 A. Yes.

21 Q. And do you see where it says,  
22 "Impact to core metrics"?

23 A. Yeah, yeah.

24 Q. And core metrics, that would  
25 include stay duration.



1 Yes?

2 A. Yes.

3 Q. In fact, stay duration is  
4 listed in the bullet right above.

5 Do you see that?

6 A. Yeah, I see it. Yeah.

7 Q. Or right below. Excuse me.

8 Do you see that right below?

9 A. Yeah.

10 Q. And then the number listed for  
11 acceptable range is 5 percent for minors and  
12 extreme usage.

13 Do you see that?

14 A. Yeah, I see that.

15 It's just like I just  
16 mentioned. When they asked me for a number  
17 to have a reference, I gave them 5. Because  
18 if we regularly remove 50 percent of the  
19 content, the stay duration drop will be like  
20 2 or 3 percent. So 5 percent means they have  
21 to remove over 50 percent of the content.

22 It couldn't be the real case,  
23 because most content user upload is just good  
24 content.

25 Q. Sir, you set this 5 percent

1 limit.

2 Is that your testimony?

3 MR. MATTERN: Objection to  
4 form. Characterizes testimony.

5 THE WITNESS: They asked me for  
6 a number. I suggest 5.

7 If it's over 5, it usually  
8 means their implementation has some  
9 bugs. Yeah.

10 For example, you may want to  
11 filter sexual content. Maybe the real  
12 percentage is 5 percent, but you  
13 overkill far more content than the  
14 5 percent, maybe 50 percent. Then the  
15 DO loss -- the stay duration loss will  
16 be very big.

17 That usually means the  
18 implementation is wrong.

19 QUESTIONS BY MR. MURA:

20 Q. Sir, 5 percent of an hour is  
21 three minutes.

22 Would you agree?

23 A. 5 percent. Yeah. Yeah.

24 Q. So if a minor safety feature  
25 caused minors to spend three minutes less on

1                   So the impact of the model  
2                   should not be significantly over  
3                   10 percent or 20 percent.

4                   That -- if you remove  
5                   10 percent or 20 percent of videos,  
6                   the stay duration loss won't be  
7                   3 percent. It will be much less.

8       QUESTIONS BY MR. MURA:

9           Q.       We're talking about a  
10           difference of 72 seconds per hour in stay  
11           duration.

12                   Yes?

13                   MR. MATTERN: Objection to  
14           form.

15                   THE WITNESS: Yes, I think your  
16           calculation is correct.

17                   (Zhu Exhibit 33 marked for  
18           identification.)

19       QUESTIONS BY MR. MURA:

20           Q.       Let's go to Tab 33. This is  
21           TIKTOK3047MDL-192-04793121. Mark this as  
22           Exhibit 33.

23                   Sir, this is a document that  
24           came from your files.

25           A.       Yeah.

1 Q. Any reason to dispute that?

2 A. Yeah.

3 Q. You said yes?

4 A. Sorry. I mean, I know the  
5 document.

6 Q. Okay. You know the document?

7 A. Yeah, yeah, yeah.

8 Q. You've seen this before?

9 A. Yes.

10 Q. The document is titled "P&C  
11 decision doc: Force login versus guest mode,  
12 consent box and age-gate in US/EU."

13 Do you see that?

14 A. Yeah, I see that.

15 Q. Did you author this document?

16 A. Do I write the document?

17 Q. Yes.

18 A. No.

19 Yeah, I think at that time

20 [REDACTED] is responsible for age-gate, because I  
21 think he launched the feature in 2021.

22 Q. But you've read it before?

23 A. Huh?

24 Q. You remember seeing it before?

25 A. Yes.

1 A. Yes.

2 (Zhu Exhibit 34 marked for  
3 identification.)

4 QUESTIONS BY MR. MURA:

5 Q. Let's look at Tab 34, please.

6 It will be Exhibit 34. This is  
7 TIKTOK3047MDL-182-LARK-07920484.

8 Sir, this is a Lark chat  
9 between you and [REDACTED]

10 Is that right?

11 A. Yeah.

12 Q. And if we pull up Tab 4, the  
13 demonstrative, slide 8.

14 This is [REDACTED] --

15 A. Yeah.

16 Q. -- [REDACTED]

17 Yes?

18 A. Yes, yes.

19 Q. And we can go back to the chat.

20 At the time of this chat in  
21 2021, [REDACTED] was senior director of  
22 global communications.

23 Yes?

24 A. Yes.

25 Q. And in this chat thread, you

1 and [REDACTED] are discussing a Wall Street  
2 Journal story about rabbit holes on TikTok.

3 Yes?

4 A. I need some time to read  
5 through the document.

6 Okay. I get context.

7 Q. Sir, can you look at the chats  
8 on the first page stamped 13:01:30?

9 A. Okay.

10 Q. Do you see where [REDACTED]  
11 writes, "The finding that 93 percent of  
12 videos in a given time were on depression  
13 content is the fear that people have - is  
14 seeing almost exclusively one topic, whatever  
15 it is, too much/how do we keep diversifying  
16 that."

17 Do you see that?

18 A. Yeah, I see it.

19 Q. [REDACTED] is referring to  
20 one of the Wall Street Journal's test  
21 accounts that fell into a depression rabbit  
22 hole.

23 Yes?

24 A. Yes.

25 Q. Please turn to the page ending

1 in 486.

2 At the top of the page, do you  
3 see where you say --

4 A. Yeah.

5 Q. -- "Yes, I'm trying to  
6 understand the priority. The difficulty is:  
7 We could add some diversity, but not too  
8 much, otherwise, users will leave, retention  
9 will drop."

10 Do you see that?

11 A. Yeah.

12 Q. So the concern here is that  
13 user retention would drop if the For You feed  
14 is more diverse.

15 Yes?

16 MR. MATTERN: Object to form.

17 THE WITNESS: If it's -- if we  
18 add too much content not -- but not  
19 according to the user's interests.

20 You know, for example, if a  
21 user like gardening and animals for --  
22 little animals, but we want -- but we  
23 instead recommend videos for other  
24 category too much -- too much means  
25 maybe you add 30 percent -- then the

1 user will feel there are too -- too  
2 many content not related to him, and  
3 stay duration will drop and the  
4 retention will drop.

5 QUESTIONS BY MR. MURA:

6 Q. So the difficulty that you're  
7 discussing here is that if the For You feed  
8 is too diverse, then users will leave --

9 A. Yeah.

10 Q. -- retention will drop --

11 A. Yeah, if --

12 Q. -- and less content diversity  
13 may keep users on the TikTok app.

14 Yes?

15 MR. MATTERN: Object to form.

16 Outside his testimony.

17 THE WITNESS: It means  
18 recommendation engine could only edit  
19 diversity based on user's interest.

20 If you recommend -- if the  
21 recommendation -- if you change the  
22 recommendation too much, then the user  
23 is not interested in the content  
24 anymore.

25



1 QUESTIONS BY MR. MURA:

2 Q. Another threshold.

3 Right?

4 A. It's not a threshold. In the  
5 dialogue, I tried to understand, is -- should  
6 we add more diversity to solve the issue in  
7 the news, or should we build classifier to  
8 identify better content. For example, the  
9 content [REDACTED] mentioned, depressing  
10 content. Which one is the true issue.

11 I believe after discussion that  
12 we need -- really needed to identify negative  
13 content, or bad content, and greatly demote  
14 this content.

15 In the same time we can add a  
16 little bit of diversity, but not too much,  
17 yeah.

18 (Zhu Exhibit 35 marked for  
19 identification.)

20 QUESTIONS BY MR. MURA:

21 Q. Sir, let's pull up Tab 35.

22 This is Exhibit 35,  
23 TIKTOK3047MDL-060-01157747. The title of  
24 this document is "Launch of Negative Affect  
25 Dispersion Strategy Global Rollout."

1 Do you see that?

2 A. Yeah.

3 Q. And it was last updated

4 June 2023.

5 Do you see that?

6 A. Yeah.

7 Q. Do you recognize this document?

8 A. It seems it come from the data  
9 team, but I -- I'm not familiar with this  
10 particular document.

11 Yeah. If the document were  
12 created after 2023, then I don't know.

13 Q. Sir, do you see consulted with  
14 Ryn Linthicum?

15 A. I don't know him.

16 Q. Ryn Linthicum testified in this  
17 case that they believe they presented to you  
18 on the negative affect dispersion model.

19 Any reason to doubt that?

20 MR. MATTERN: Object to form.

21 THE WITNESS: I don't know this  
22 person. I don't even remember the  
23 name, no.

24 QUESTIONS BY MR. MURA:

25 Q. The project that this is

1 referring to was designed to solve depression  
2 rabbit holes on TikTok.

3 Yes?

4 MR. MATTERN: Object to form.  
5 Foundation.

6 THE WITNESS: I haven't found  
7 depression in the document.

8 QUESTIONS BY MR. MURA:

9 Q. Well, it says --

10 A. I believe it's definitely about  
11 dispersion strategy, but I'm not -- I'm not  
12 certain if it's targeted at the previous  
13 document, that depression comment.

14 Q. What is -- what is negative  
15 affect dispersion, sir?

16 A. I think it's hard to  
17 understand. Maybe it's a better translation,  
18 maybe, for a Chinese term.

19 I believe that may means...

20 Q. Would you like someone to  
21 translate it for you, sir?

22 A. It's just I'm not familiar with  
23 document. Maybe I need to read, for example,  
24 background and maybe testing section to fully  
25 understand the document.

1 A. Yeah, yeah, yeah.

2 Q. The priority between adding  
3 diversity --

4 A. Yeah.

5 Q. -- which would help the  
6 problem, and too much diversity --

7 A. Yeah.

8 Q. -- which would cause users to  
9 leave, retention will drop.

10 That's what you said --

11 A. Yeah.

12 Q. -- in that Lark chat.

13 Yes?

14 A. Yeah, yeah.

15 MR. MATTERN: Object to form.

16 THE WITNESS: It will create  
17 normal users experience too much.

18 QUESTIONS BY MR. MURA:

19 Q. Let's go to 35.

20 A. Yeah.

21 Q. Do you see on page 2?

22 A. Yeah.

23 Q. Do you see where it says,  
24 "Project background"?

25 A. Yes.

1 Q. And it says, "In July 2021,  
2 Wall Street Journal flagged TikTok's  
3 algorithms revealed the risk of users  
4 entering rabbit holes, i.e., filter bubbles,  
5 where users may get stuck in a loop of  
6 content featuring negative affect."

7 Do you see that?

8 A. Yes.

9 Q. Do you need the phrase  
10 "negative affect" translated for you, sir?

11 A. I think it just means if a user  
12 received the content too much, it may make  
13 them feel uncomfortable.

14 Q. Could it mean depression, sir?

15 A. Yeah.

16 Q. So this is specifically  
17 discussing the problems that the Wall Street  
18 Journal identified.

19 Yes?

20 A. Yes.

21 Q. Can you turn to the page ending  
22 in 749 under A/B testing?

23 A. Yes.

24 Q. Do you see where it says, "A/B  
25 testing"?

1 A. Yeah.

2 Q. And then it says, "Success  
3 metrics."

4 Do you see that?

5 A. Yes.

6 Q. And if you look three bullets  
7 down, it says, "Stay duration, top limit for  
8 filter bubble project, less than or equal to  
9 negative 0.3 percent."

10 Do you see that?

11 Sorry, just 0.3 percent. Do  
12 you see that?

13 A. I see that.

14 Q. Do you recall setting a  
15 0.3 percent stay duration limit for the  
16 filter bubble project?

17 A. Of course not.

18 Q. That's what this document says.  
19 Yes?

20 MR. MATTERN: Objection to  
21 form.

22 THE WITNESS: Yes.

23 MR. MATTERN: Characterizes  
24 document.

25 THE WITNESS: I think it's

## 1 CERTIFICATE

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

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

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

22 <%31964,Signature%>

23 CARRIE A. CAMPBELL,  
24 NCRA Registered Diplomate Reporter  
25 Certified Realtime Reporter  
California Certified Shorthand  
Reporter #13921  
Missouri Certified Court Reporter #859  
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Texas Certified Shorthand Reporter #9328  
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Louisiana Certified Court Reporter  
#2021012  
Notary Public  
Dated: May 29, 2025

**Exhibit 427B**

**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



Wenjia Zhu

449

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA )  
 ADOLESCENT ADDICTION/PERSONAL )  
 INJURY PRODUCTS LIABILITY ) MDL No. 3047  
 LITIGATION )  
 \_\_\_\_\_ )  
 THIS DOCUMENT RELATES TO: )  
 ALL ACTIONS )

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

COORDINATION PROCEEDING ) Lead Case No.  
 SPECIAL TITLE [RULE 3.550] ) 22STCV21355  
 \_\_\_\_\_ )  
 SOCIAL MEDIA CASES ) JCCP No. 5225  
 \_\_\_\_\_ )  
 THIS DOCUMENT RELATES TO: ) Judge:  
 ALL ACTIONS ) Carolyn B.  
 ) Kuhl, Dept.12

SUNDAY, MAY 25, 2025

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 PURSUANT TO PROTECTIVE ORDER

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Videotaped deposition of Wenjia  
 Zhu, Volume II, held at the offices of King &  
 Spalding, LLP, 1 Raffles Quay, #31-01 North  
 Tower, Singapore, commencing at 9:04 a.m., on  
 the above date, before Carrie A. Campbell,  
 Registered Diplomate Reporter, Certified  
 Realtime Reporter, Illinois, California &  
 Texas Certified Shorthand Reporter, Missouri,  
 Kansas, Louisiana & New Jersey Certified  
 Court Reporter.

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1 VIDEOGRAPHER: We are back on  
2 the record. Today's date is May 25,  
3 2025. This is a continuation  
4 deposition of Wenjia Zhu.

5 The time is 9:04 a.m. We are  
6 back on the record.

7  
8 DIRECT EXAMINATION (continued)

9 QUESTIONS BY MR. MURA:

10 Q. Good morning, sir.

11 A. Good morning.

12 Q. I'll just remind you that  
13 you're under oath.

14 You understand that?

15 A. Yeah, yeah.

16 Q. And that the same rules that we  
17 discussed yesterday will apply to today's --

18 A. Okay.

19 Q. -- proceedings?

20 And the interpreter is also  
21 under oath.

22 Yes?

23 INTERPRETER: Thank you.

24 (Zhu Exhibit 37 marked for  
25 identification.)

1 QUESTIONS BY MR. MURA:

2 Q. Can we pull up Tab 38? This is  
3 TIKTOK3047MDL-045-LARK-00468321, and this is  
4 Exhibit 38.

5 Sir, this document is titled  
6 "General Recommendation Intro."

7 Yes?

8 A. Yes.

9 Q. And it's about the  
10 recommendation system.

11 Yes?

12 A. Yes.

13 Q. And we've discussed you're very  
14 familiar with the recommendation system.

15 Yes?

16 A. Yes.

17 Q. Have you seen this document  
18 before?

19 A. No. I think in our company we  
20 don't have a strict rule who can write  
21 introduction, so I believe there are a bunch  
22 of recommendation introduction written by  
23 different people.

24 Q. Okay. I'll represent to you  
25 that this document was last modified on

1 February 10, 2021.

2 Do you see that?

3 A. Yeah.

4 Q. So let's look at the first  
5 paragraph on the first page, the language,  
6 "The purpose."

7 It says, "The purpose of this  
8 doc aims to give a gentle introduction into  
9 how the recommendation system works."

10 Do you see that?

11 A. Yeah.

12 Q. And do you see the section  
13 that's titled "Simple intro into how  
14 recommendation works"?

15 A. Yeah.

16 Q. And if we zoom out and go to  
17 the next sentence, and if we can also pull in  
18 the graph.

19 A. Yeah.

20 Q. It says, "TikTok, in essence,  
21 simply consists of the interactions between,  
22 one, users, and, two, videos."

23 Do you see that?

24 A. Yeah.

25 Q. So according to this explainer,

1 Q. So according to the document, a  
2 new user starts TikTok for the first time,  
3 and the recommendation system, it doesn't  
4 just load video recommendation, right? It  
5 loads several?

6 A. Yeah, yeah.

7 Q. And the number is actually  
8 eight.

9 Right?

10 A. I'm not sure whether it's eight  
11 today, but I think it's some -- ranging from  
12 maybe five to ten. But not one. Otherwise,  
13 it will put too much computing this other  
14 side.

15 Q. So your experience, it was five  
16 to ten but not one?

17 A. Yeah. Yeah.

18 Q. And this document says eight.

19 Yes?

20 A. Yeah.

21 Q. So that just means the  
22 recommendation system queues up several  
23 videos, five to ten, or eight here --

24 A. Yeah.

25 Q. -- to show to the user.

1 Yes?

2 A. Yeah.

3 Q. And this group of videos is  
4 called the load.

5 Is that correct?

6 A. It could be called load.

7 Q. Okay. Next the document  
8 says -- strike that.

9 Next the document says -- it  
10 refers to "this load contains eight videos."

11 Right?

12 A. Yeah.

13 Q. You just testified it could be  
14 five to ten, but this says eight videos.

15 And it says, "These eight  
16 videos are chosen from a small pool of videos  
17 that are known to be very popular on TikTok."

18 Do you see that?

19 MR. MATTERN: Object to form.

20 THE WITNESS: I see that, but  
21 it's not accurate.

22 Actually, the whole pipeline  
23 contains several stage. The first  
24 stage is called recall. So the total  
25 repository of videos is usually on

1 scale of several hundred million, and  
2 the recall system will return several  
3 thousand to the ranking system. Then  
4 ranking system finally select the  
5 eight videos to the users.

6 So the words "known to be very  
7 popular on TikTok," I think, is not --  
8 not correct.

9 And if you use TikTok itself,  
10 you can always see videos with very  
11 little like. So they are not popular  
12 videos.

13 QUESTIONS BY MR. MURA:

14 Q. Sir, how would you describe the  
15 first set of videos that are selected by the  
16 recommendation algorithm system?

17 A. It's -- it's not different from  
18 other videos. It's just some features are  
19 not -- I mean, since the system don't know  
20 the interest of the users, so some features  
21 are randomly initiated, but the whole  
22 pipeline process is the same.

23 Q. So you just said the system  
24 doesn't at this point know the interests of  
25 the users.

1                   So is it fair to say that this  
2 first load of videos, whether it's five to  
3 ten or eight, they're not personalized to the  
4 user?

5                   Yes?

6                   MR. MATTERN: Object to form.

7                   THE WITNESS: There is a little  
8 personalization based on information  
9 that we can get from new users, but I  
10 think it's very limited. It's like  
11 whether you are using the Android  
12 system or iOS system. Maybe the land  
13 you're sitting or the rough location,  
14 for example, whether in US or  
15 Singapore.

16                   So still they're a little bit  
17 of personalization, but are not  
18 targeted on the specific users.

19 QUESTIONS BY MR. MURA:

20                   Q.       So there's a little  
21 personalization based on private information  
22 that TikTok collects --

23                   A.       Yeah.

24                   Q.       -- such as location --

25                   MR. MATTERN: Object to form.



1 Q. And when it says, "Those  
2 interests are not human readable," do you see  
3 that?

4 A. Yeah. It's not directly  
5 readable because it's a bunch of numbers, for  
6 example, 500 numbers are ranging maybe  
7 from -- it's something like 3.13, 4.07, so  
8 it's not directly readable.

9 But with some help, for  
10 example, if you try to do clustering, then  
11 for each cluster is somehow understood, for  
12 example, maybe other cat video will be  
13 clustered together.

14 So that indicate the  
15 recommendation system will understand a  
16 little bit of the content.

17 (Zhu Exhibit 42 marked for  
18 identification.)

19 QUESTIONS BY MR. MURA:

20 Q. Let's go to Tab 42. This is  
21 TIKTOK3047MDL-015-00331402, and it's also  
22 Exhibit 42.

23 Sir, have you had a chance to  
24 review it?

25 A. Yeah.

1 Q. All set?

2 Okay. Do you see the last page  
3 where it says, "File name"? That the  
4 document is called "algo playbook"?

5 A. Yeah.

6 Q. And do you see that the date is  
7 November 2019?

8 A. Yes.

9 Q. Have you seen this document  
10 before?

11 A. No. I mentioned, there are too  
12 many people write introduction to  
13 recommendation system.

14 Q. But you're familiar with the  
15 content shown?

16 A. I think I could understand most  
17 of the content.

18 Q. Can you turn to page -- the  
19 19th page of this slide deck, please? It's  
20 the one that starts with "recommendation  
21 roadmap" at the top.

22 A. Okay. I see the page.

23 Q. And do you see the title of  
24 that slide, "Recommendation Roadmap"?

25 A. Yeah, I see the title.

1 way to improve diversity.

2 QUESTIONS BY MR. MURA:

3 Q. Can you please turn two more  
4 pages, please, to where the slide says  
5 "Predict"?

6 A. Yeah.

7 Q. And this is again talking about  
8 the recommendation algorithm.

9 Yes?

10 A. Yeah. Yes.

11 Q. And it says, "All user actions,  
12 like clicks and play time, are inputs used to  
13 predict a user's personality and engagement  
14 on a given video."

15 Do you see that?

16 A. I see that, but I think the  
17 document may be written by someone outside  
18 the -- the data team. So the wording he --  
19 he used is kind of strange.

20 The input I used to train  
21 model, right, then we used the model to  
22 predict the possibility of certain action.  
23 And the prediction take into account that the  
24 using betting, so the score is personalized.

25 Q. That's very helpful.

1                   So what -- how would you have  
2 written this?

3           A.       How would I have written this?

4           Q.       Yes.

5           A.       I would say all user  
6 interactions, like play time, click "like,"  
7 follow the creators, whether to use the  
8 soundtrack, are training instance used to  
9 train a model and the model updated in  
10 realtime.

11                   And finally, we used the model  
12 to predict users different behaviors on new  
13 video and combine the signal to get final  
14 score of the video.

15                   Finally, we rank videos  
16 according to the -- to the score.

17           Q.       And can I ask you to turn to  
18 the next slide, please?

19           A.       Okay.

20           Q.       Do you see where it says,  
21 "Personalized" and then "Item ranking"?

22           A.       Yeah, yeah, I see it on the  
23 screen.

24           Q.       And there it says, "As we  
25 combine users' action rates, finish rates" --

1 A. Yeah.

2 Q. -- "like rates, follow rates,  
3 share rates, et cetera, on each video, we  
4 rank videos by the highest probabilities of  
5 engagement by the user."

6 Do you see that?

7 A. Yeah, I see that.

8 Q. And it says, "Capped by  
9 frequency rules."

10 Do you see that?

11 A. I see it.

12 Q. So the recommendation algorithm  
13 is trying to choose whichever video will be  
14 most engaging to the user based on past user  
15 actions.

16 Yes?

17 MR. MATTERN: Objection to  
18 form. Characterizes document.

19 THE WITNESS: Yeah, first, it's  
20 not we combine users' action rate.

21 It's we combine the model -- the  
22 model's output to -- the model used to  
23 predict user's action rate and we use  
24 to predict -- predicted the output and  
25 then combined these predicted values

1 together. Then we rank videos  
2 according to a score.

3 So I think the final score is  
4 correlated to engagement, but  
5 engagement itself is not a very clear  
6 definition, right.

7 Sometimes maybe if you add more  
8 weight on like, then the finish rate  
9 will increase. So in the end, it's a  
10 balance of different action rate.

11 QUESTIONS BY MR. MURA:

12 Q. So you would say it's a  
13 balance?

14 A. Yeah.

15 Q. Different weighted factors?

16 A. Yeah.

17 Q. But overall, the ranking is  
18 trying to be -- is trying to order videos by  
19 highest probability of engagement?

20 MR. MATTERN: Object to form.

21 THE WITNESS: Yeah. Let me  
22 give you an example.

23 If we put too much weight on  
24 finish rate, then short videos will  
25 have some advantage, right? If the

1 Yes?

2 MR. MATTERN: Object to form  
3 and --

4 THE WITNESS: It's not designed  
5 by the algorithm. It's designed by  
6 engineer. They test different  
7 combination.

8 For example, we can try to add  
9 more weight on finish rate. Then what  
10 we observe is that the finish rate  
11 increase, but other user behavior will  
12 decrease. And maybe the experience  
13 will be worse, so that will not be  
14 accepted. Yes.

15 So it's usually decided by a  
16 combination of A/B test and the human  
17 common sense.

18 QUESTIONS BY MR. MURA:

19 Q. Let's pull up -- oh, let me ask  
20 you one more question about this document,  
21 sir.

22 A. Okay.

23 Q. If you flip to the next page,  
24 at the top of the page, do you see where it  
25 says, "TikTok recommendation algorithm is not

1 capable of recognizing potentially  
2 inappropriate content. This is because our  
3 algorithm is based mostly on user  
4 interactions; thus, it lacks the ability to  
5 detect gray area content since algorithm has  
6 no idea what type of content it is  
7 recommending to users."

8 Do you see that?

9 A. Yeah, I think -- I think  
10 accurate -- add some explanation here.

11 Since the model take user ID,  
12 item ID, into input and then try to predict  
13 user's action, it have very limited  
14 understanding of what the content actually  
15 is.

16 It's different than human can  
17 actually understand every words and every  
18 images. The algorithm have very limited  
19 understanding.

20 Yeah, so that's why I set that  
21 direction. And we want to compensate the  
22 weakness of the recommendation system by  
23 working with TnS. They could provide content  
24 classification model so we can use to demote  
25 inappropriate content.



1 together.

2 Q. So your team was proposing to  
3 use a level model to detect under  
4 18-year-olds?

5 MR. MATTERN: Objection to  
6 form. Mischaracterizes testimony.

7 THE WITNESS: Yeah. According  
8 to the document, I think they proposed  
9 use level model and age-gate together  
10 to increase the coverage.

11 (Zhu Exhibit 52 marked for  
12 identification.)

13 QUESTIONS BY MR. MURA:

14 Q. Let's pull up Tab 56. This is  
15 Exhibit 52. It's TIKTOK3047MDL-001-00003076.

16 MR. MURA: Let's go off the  
17 record.

18 VIDEOGRAPHER: The time is  
19 12:07 p.m. We are off the record.

20 (Off the record at 12:07 p.m.)

21 VIDEOGRAPHER: The time is  
22 12:12 p.m. We are back on the record.

23 QUESTIONS BY MR. MURA:

24 Q. Sir, the algorithm team, your  
25 team --

1 A. Yes.

2 Q. -- used an age model as part of  
3 TikTok's recommendation engine.

4 Yes?

5 MR. MATTERN: Objection to  
6 form.

7 THE WITNESS: Yes.

8 QUESTIONS BY MR. MURA:

9 Q. And that's what this document  
10 before you is discussing.

11 Yes?

12 A. What?

13 Q. That's what this document  
14 before you on the screen...

15 A. This document before I -- yeah,  
16 yeah, I can see document on my screen.

17 Q. Yes.

18 And the title of the document  
19 is "TT-M user age model launch  
20 announcements."

21 A. Yeah. After I read document, I  
22 think it's a regular update of the age model,  
23 but not cover all the regions. I think TT-M  
24 and the TT-T means two different sets of  
25 countries.

1 Q. And which set would include the  
2 United States?

3 A. TT-M.

4 Q. And this is an announcement in  
5 reference to the use of an age model as part  
6 of TikTok's recommendation algorithm.

7 Is that correct?

8 MR. MATTERN: Object to form.

9 THE WITNESS: Yeah. Yeah. We  
10 use it to apply more aggressive  
11 filters to young users.

12 QUESTIONS BY MR. MURA:

13 Q. Do you see where it says here,  
14 "In order to improve user experience, TikTok  
15 data team and TikTok product team trains and  
16 iterated the user age model in June 2021"?

17 A. Yeah.

18 Q. "Based on the improvement of  
19 model performance, we conducted A/B tests and  
20 explained the changes of all the core  
21 metrics. Currently we have already launched  
22 the new version of user age model in TT-M  
23 regions on October 27th."

24 Do you see that?

25 A. Yeah.

1 MR. MATTERN: Objection to  
2 form. Characterizes document.

3 QUESTIONS BY MR. MURA:

4 Q. Do you see just below that  
5 there -- it says, "Performance table"?

6 A. Yes.

7 Q. Do you see there's a column  
8 "all users"?

9 A. Yes.

10 Q. And under that it says "1"?

11 A. Yeah.

12 Q. And 1 means L1?

13 A. According to the table, I think  
14 so.

15 Q. And we've reviewed that's 13  
16 and 14.

17 Yes?

18 A. Yes.

19 And according to the table, I  
20 think it partly explain the confusion you  
21 have in the last document. You multiply 26.5  
22 with 50 and get an insanely big number.

23 We can look at here, the  
24 precision of area 1 before upgrade is only  
25 27. That means every four account the model

1 think is L1. Only actually one of them is  
2 actually -- is truly L1.

3 So at that time before upgrade,  
4 the model is highly inaccurate.

5 MR. MURA: I'll move to strike  
6 that as nonresponsive.

7 MR. MATTERN: Objection.

8 QUESTIONS BY MR. MURA:

9 Q. Sir, this is talking about DAU.  
10 Right?

11 MR. MATTERN: Objection.

12 THE WITNESS: Yeah. Yeah.

13 Yeah.

14 QUESTIONS BY MR. MURA:

15 Q. Okay. Do you see there's a  
16 column under new model labeled "Recall"?

17 Do you see that?

18 A. Yeah. Yeah.

19 Q. Do you see that in the context  
20 of L1 users, recall refers to the percentage  
21 of all L1 users on the TikTok app that the  
22 model is able to identify?

23 Do you see that?

24 MR. MATTERN: Objection to

25 form.

1 THE WITNESS: As this number, I  
2 think, is estimated based on limited  
3 test set.

4 QUESTIONS BY MR. MURA:

5 Q. Sir, I'm not asking about the  
6 number. My question was --

7 A. Yeah.

8 Q. -- do you see in the context of  
9 L1 users, there's the word "recall"?

10 A. Yes. Recall.

11 Q. And recall refers to the  
12 percentage of all L1 users on the TikTok app  
13 that the model is able to identify.

14 Is that --

15 A. Yes, I see it.

16 MR. MATTERN: Objection. Asked  
17 and answered.

18 THE WITNESS: But that's  
19 estimating on the test set.

20 QUESTIONS BY MR. MURA:

21 Q. Okay. And according to these  
22 figures, it says -- do you see where it says  
23 "78.11 percent recall"?

24 A. Yes.

25 Q. And so 78.1 percent --

1 78.11 percent recall for the new model for  
2 age level 1, that means that the new age  
3 model was able to identify about 78 percent  
4 of all users on the TikTok app who were L1  
5 users.

6 Yes?

7 MR. MATTERN: Objection to  
8 form, and characterizes document.

9 THE WITNESS: Yeah, maybe I can  
10 explain more clearly.

11 QUESTIONS BY MR. MURA:

12 Q. Well, can you answer my  
13 question first?

14 MR. MATTERN: The witness is  
15 trying to answer your question.

16 QUESTIONS BY MR. MURA:

17 Q. Does this indicate that the new  
18 age model was able to identify about  
19 78 percent of all users on the TikTok app who  
20 were L1?

21 MR. MATTERN: Objection to  
22 form, and characterizes the document.

23 THE WITNESS: It's an  
24 estimation on the test set, yeah.

25 MR. MURA: Okay. We can take

1 need more context. But I see words here.

2 Q. You see that that's what the  
3 document says?

4 A. Yeah.

5 MR. MATTERN: Objection to  
6 form.

7 (Zhu Exhibit 53 marked for  
8 identification.)

9 QUESTIONS BY MR. MURA:

10 Q. Let's pull up Tab 72, which  
11 we'll mark as Exhibit 53. Tab 72, which is  
12 Exhibit 53.

13 MR. MURA: Can we go off the  
14 record?

15 VIDEOGRAPHER: Yeah. The time  
16 is 12:59 p.m. We are off the record.  
17 (Off the record at 12:59 p.m.)

18 VIDEOGRAPHER: The time is  
19 1:04 p.m. We are back on the record.

20 QUESTIONS BY MR. MURA:

21 Q. Sir, we've been discussing  
22 TikTok's use of age models for various  
23 purposes.

24 Yes?

25 A. Yes.



1 Q. And are you aware that TikTok  
2 also used an age model to help target ads  
3 based on age?

4 MR. MATTERN: Objection to  
5 form.

6 THE WITNESS: I don't lead the  
7 ads team, but I believe they don't use  
8 ads for -- as tested.

9 QUESTIONS BY MR. MURA:

10 Q. The document that we've just  
11 handed you, sir --

12 A. Yeah.

13 Q. -- do you see on the front page  
14 that it says -- there's a case caption there,  
15 In Re: Social Media?

16 A. Yeah. Yeah, I see it.

17 Q. That's the case we're  
18 testifying in today.

19 Yes?

20 A. Yeah, I believe so.

21 Q. And do you see that the title  
22 next to it is the "The TikTok Defendants'  
23 Objections and Responses to Plaintiffs'  
24 Requests for Admission"?

25 A. Yes.

1 Q. So I'll represent to you that  
2 in this document plaintiffs have made certain  
3 requests --

4 A. Yeah.

5 Q. -- to TikTok to admit certain  
6 facts, and this is the TikTok defendants'  
7 objections and responses to those questions.

8 A. Okay.

9 Q. Can you please turn to page 21,  
10 which is request 28?

11 A. Okay. I see it.

12 Q. Do you see a response there to  
13 the question, "Admit that you use  
14 age-determining technology, grade level, the  
15 algorithm for which is based on users'  
16 behavior and other metrics" --

17 A. Yes.

18 Q. -- "for purposes such as  
19 advertising"?

20 A. Yes, I see the question.

21 Q. And do you see the response  
22 that "TikTok defendants admit only that they  
23 have offered one or more models that are  
24 trained on datasets to recognize patterns and  
25 make non-determinative predictions about a

1 user's age band or level"?

2 Do you see that?

3 A. Okay.

4 Q. If you go lower on the screen.

5 A. Okay.

6 Q. If you continue to go lower.

7 Oh, there you go.

8 A. Defendant admits only that they  
9 offered -- {reading sotto voce}.

10 Q. Why don't I read it again, sir,  
11 so we have a clean record.

12 Do you see where it says, "The  
13 TikTok defendants admit only that they  
14 offered one or more models that are trained  
15 on datasets to recognize patterns and make  
16 non-determinative predictions about a user's  
17 age band or level"?

18 Do you see that?

19 A. Yeah, I see that.

20 Q. And then do you see the age  
21 bands?

22 A. Yes.

23 MR. MATTERN: Objection to  
24 form.

25

1 QUESTIONS BY MR. MURA:

2 Q. And then it continues, "To aid  
3 in the age-appropriate delivery of  
4 advertisements to TikTok users."

5 Do you see that?

6 A. I see that, but I don't know  
7 detail of the ad system. I don't lead their  
8 team.

9 Q. And do you see that one of the  
10 age bands is 13 to 17?

11 A. I see number there, yeah.

12 (Zhu Exhibits 54 and 54A marked  
13 for identification.)

14 QUESTIONS BY MR. MURA:

15 Q. Let's pull up Tab 54. This is  
16 TIKTOK3047MDL-101-LARK-05232927.

17 Sir, I'll let you look through  
18 the document, but let me just say the  
19 document we handed to you is in Chinese.

20 A. Yeah, yeah.

21 Q. And we've had it translated, so  
22 I'm also going to hand you a translated  
23 copy --

24 A. Okay. Okay.

25 Q. -- which is the same exhibit

1 QUESTIONS BY MR. MURA:

2 Q. And do you recall that after  
3 that young girl died, Italy was moving to ban  
4 TikTok?

5 MR. MATTERN: Same objections.

6 THE WITNESS: I'm not sure,  
7 because I think the GR team is talking  
8 to -- I think they have a regulation  
9 department -- sorry, I forget name,  
10 but I think it -- mostly GR deal with  
11 that issue.

12 QUESTIONS BY MR. MURA:

13 Q. So in the next private -- in  
14 the next sentence of this private chat with  
15 Holly Song --

16 A. Yeah.

17 Q. -- she wrote, "During our  
18 communication with EU regulators, we proposed  
19 developing a model specifically for detecting  
20 under 13, referred to as model 1."

21 Do you see that?

22 MR. MATTERN: Objection to  
23 form.

24 THE WITNESS: Yeah, I see it.

25

1 QUESTIONS BY MR. MURA:

2 Q. And then it says, "And we told  
3 the regulators that we didn't have any U13  
4 models online."

5 Do you see that?

6 MR. MATTERN: Objection to  
7 form.

8 THE WITNESS: I see the words,  
9 yeah, but I'm not sure what that "we"  
10 means because I certainly did not  
11 write that document.

12 But maybe she referred to  
13 someone in the GR team or in the TnS  
14 team prepared document and send it to  
15 regulator.

16 QUESTIONS BY MR. MURA:

17 Q. Fair to say she's referring to  
18 TikTok?

19 MR. MATTERN: Objection to  
20 form.

21 THE WITNESS: It's definitely  
22 someone work for TikTok, yeah.

23 QUESTIONS BY MR. MURA:

24 Q. But not you?

25 A. Not me, yeah.

1 Q. And then [REDACTED] in her  
2 private chat with you, continues, "Two"?

3 A. Yeah.

4 Q. "After we promised this new U13  
5 model to the regulators, we discovered in the  
6 second half of 2021 that TnS had launched a  
7 model for detecting U13, referred to as  
8 model 2, at the end of 2020."

9 Do you see that?

10 MR. MATTERN: Objection to  
11 form. Foundation.

12 THE WITNESS: I see it. But  
13 because the model, it mentioned in the  
14 sentence, was launched by TnS in  
15 the -- at 2020, the first I joined  
16 TikTok in 2021. And I'm not the  
17 leader of TnS team. So I'm -- I can't  
18 know the details about why they launch  
19 or how they launch.

20 QUESTIONS BY MR. MURA:

21 Q. This was what [REDACTED] told  
22 you.

23 Correct?

24 A. Yes.

25 MR. MATTERN: Objection to

1 form.

2 THE WITNESS: Yes.

3 QUESTIONS BY MR. MURA:

4 Q. And TnS refers to trust and  
5 safety.

6 Yes?

7 A. Yes.

8 Q. So according to this private  
9 chat from [REDACTED] --

10 A. Yeah.

11 Q. -- when TikTok told the EU  
12 regulators that it did not have an age model  
13 that it could use, that wasn't true?

14 MR. MATTERN: Objection to form  
15 and foundation.

16 THE WITNESS: I think from the  
17 dialogue here, I think there may be  
18 some misunderstanding internally. So  
19 we did not tell the correct  
20 information to regulator.

21 But we found it, yeah. I think  
22 this is what [REDACTED] wanted to say.

23 QUESTIONS BY MR. MURA:

24 Q. You think there was a  
25 misunderstanding?



1 MR. MATTERN: Objection to form  
2 and foundation.

3 THE WITNESS: I think the  
4 people gather information, then sent  
5 information to the regulator. I think  
6 he did not collect enough information.

7 For example, there -- there at  
8 the model launched 2020, maybe he --  
9 the people collect information for us  
10 on POC for our different teams where  
11 they ignore that team.

12 QUESTIONS BY MR. MURA:

13 Q. Sir, you're saying the  
14 regulators did something wrong?

15 MR. MATTERN: Objection to  
16 form.

17 THE WITNESS: No, no, no. I  
18 think it's our internal employee.  
19 When they collect the information, the  
20 information they collected is  
21 incomplete.

22 QUESTIONS BY MR. MURA:

23 Q. Sir, according to this  
24 document --

25 A. Yeah.

1 Q. -- when TikTok told the EU  
2 regulators that it did not have an age model  
3 that it could use, that wasn't true. That's  
4 what this document shows.

5 Yes?

6 MR. MATTERN: Objection to  
7 form. Foundation. Mischaracterizes  
8 document.

9 THE WITNESS: Yeah, it just  
10 says they discovered it in the second  
11 half of 2021. They know the fact that  
12 there already a model launched in the  
13 end of 2020.

14 So I think they don't want to  
15 cheat. It's just the information they  
16 collect is not complete.

17 QUESTIONS BY MR. MURA:

18 Q. No, sir. It says, "TnS had  
19 launched a model for detecting U13, referred  
20 to as model 2, at the end of 2020."

21 Yes?

22 A. Yes.

23 MR. MATTERN: Objection to  
24 form.

25

1 QUESTIONS BY MR. MURA:

2 Q. And it also says that "In 2021,  
3 during our communication with EU regulators,  
4 we told the regulators that we didn't have  
5 any U13 models online."

6 That's what this document says,  
7 yes?

8 MR. MATTERN: Objection to  
9 form. Foundation. Characterizes the  
10 document.

11 THE WITNESS: After they talked  
12 to regulator, they found that actually  
13 a model already been launched.

14 So what they tell the regulator  
15 is not correct. They found it not  
16 correct.

17 QUESTIONS BY MR. MURA:

18 Q. And then on the next page,  
19 there's a portion of the chat that's hidden  
20 due to attorney-client privilege.

21 Do you see that? You see it  
22 says "redacted"?

23 A. Redacted.

24 Q. Yes.

25 (Discussion with interpreter.)

1           A.       Okay. Okay. Deleted, right.

2                   CHECK INTERPRETER: No, it's --

3       QUESTIONS BY MR. MURA:

4           Q.       It means we can't see it.

5                   (Discussion with check  
6       interpreter.)

7                   INTERPRETER: No, it's not  
8       editable. It's just blocked.

9       QUESTIONS BY MR. MURA:

10          Q.       We can't see that information.

11          A.       Yeah. Yeah. Okay. Okay. I  
12       get it. Yeah.

13          Q.       And after that, the message  
14       continues. [REDACTED] says, "I have some  
15       concerns here."

16                   Do you see that?

17          A.       I see it.

18          Q.       And then it lists two concerns.

19                   "1, EU regulators require us to  
20       delete a large volume of U13, which may  
21       result in 5 percent to 10 percent of DAU  
22       churn."

23                   Do you see that?

24          A.       I see it.

25                   MR. MATTERN: Object to form.

1 QUESTIONS BY MR. MURA:

2 Q. So according to this first  
3 concern, bowing to EU regulators and using an  
4 AI model to remove a large volume of under  
5 13-users may result in TikTok losing 5 to  
6 10 percent of its daily active users in the  
7 EU.

8 Yes?

9 MR. MATTERN: Objection to  
10 form. Foundation. Characterizes  
11 document.

12 THE WITNESS: Yeah, it's the  
13 opinion from [REDACTED]

14 QUESTIONS BY MR. MURA:

15 Q. That's what she wrote.

16 Yes?

17 A. Yes.

18 Q. And then there's concern  
19 number 2.

20 Do you see that?

21 A. Yeah.

22 Q. And it says, "2, once this  
23 information is made public, regulators in  
24 other countries will follow suit, which will  
25 have a relatively large impact on DAUs in

1 Europe and the United States."

2 Do you see that?

3 MR. MATTERN: Objection to  
4 form.

5 THE WITNESS: Yeah, I see her  
6 opinion.

7 QUESTIONS BY MR. MURA:

8 Q. So according to this document,  
9 if the information were made public that  
10 TikTok could use an AI age model to remove  
11 users under 13, then US regulators would  
12 follow suit and require TikTok to remove more  
13 under 13 users in the US?

14 MR. MATTERN: Objection to  
15 form. Characterizes document.

16 THE WITNESS: Yeah. According  
17 to the previous paragraph, it said the  
18 model was developed in TnS in the end  
19 of 2020. I'm not sure the -- how the  
20 trend model -- or whether the model is  
21 accurate enough.

22 QUESTIONS BY MR. MURA:

23 Q. Sir, my question was --

24 A. Yeah.

25 Q. -- the concern that's being

1 identified here --

2 A. Yeah.

3 Q. -- was if the information was  
4 made public, the information that TikTok  
5 could use an AI age model to remove users  
6 under 13, then US regulators would require  
7 TikTok to remove more under 13 users in the  
8 US.

9 Correct? That's the concern  
10 identified here?

11 MR. MATTERN: Objection to  
12 form. Characterizes document.

13 THE WITNESS: Yeah, this --  
14 this her concern.

15 QUESTIONS BY MR. MURA:

16 Q. And that would have a  
17 relatively large impact on DAUs in the United  
18 States.

19 Correct?

20 MR. MATTERN: Objection to  
21 form.

22 THE WITNESS: I'm not sure.

23 QUESTIONS BY MR. MURA:

24 Q. That's what she said.

25 Yes?

1 A. Yeah, that's her opinion.

2 Q. Sir, the concern she's  
3 expressing is if the truth comes out, the  
4 regulators would make you use the tools that  
5 you have to actually remove under  
6 13-year-olds from the platform.

7 Yes?

8 MR. MATTERN: Objection to  
9 form. Characterizes document.

10 THE WITNESS: Yeah, I already  
11 mentioned the model, it's developed  
12 inside of TnS, not inside of my team.  
13 And from my opinion, I believe we  
14 should be honest to regulators. If we  
15 found something wrong, we need to  
16 correct that.

17 QUESTIONS BY MR. MURA:

18 Q. Did you ever tell EU regulators  
19 that the company had already developed an age  
20 model at the end of 2020?

21 MR. MATTERN: Objection to  
22 form.

23 THE WITNESS: I can't memorize  
24 the details, but I think the legal  
25 team formed the issue. I can't say



1 for sure whether they tell the  
2 regulator or not. I can't remember  
3 that.

4 But I think the legal team can  
5 answer the question. Or the TnS team  
6 can answer the question.

7 QUESTIONS BY MR. MURA:

8 Q. So do you know if TikTok ever  
9 told the EU regulators that the company had  
10 already developed an age model at the end of  
11 2020?

12 MR. MATTERN: Objection to  
13 form.

14 THE WITNESS: Sorry.  
15 Currently, I can't remember for sure  
16 whether the legal team tell or not.

17 QUESTIONS BY MR. MURA:

18 Q. Do you know if TikTok ever told  
19 US regulators that the company had already  
20 developed an age model at the end of 2020?

21 MR. MATTERN: Objection to  
22 form.

23 THE WITNESS: Yes. Since  
24 during 2019 and 2020, I worked for  
25 Toutiao, so I don't know your

## 1 CERTIFICATE

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

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

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

22 <%31964,Signature%>

23 CARRIE A. CAMPBELL,  
24 NCRA Registered Diplomate Reporter  
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