

AMENDED Exhibit 430

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

Message

From: [REDACTED]@tiktok.com]
Sent: 6/21/2019 9:32:00 PM
To: [REDACTED]@snap.com]
CC: [REDACTED]@bytedance.com]; [REDACTED]@snapchat.com]; Julia Yan [REDACTED]@bytedance.com]; [REDACTED]@bytedance.com]; [REDACTED]@bytedance.com]
Subject: Re: [External Email] Re: Snap Introduction
Attachments: Screen Shot 2019-06-16 at 12.19.59 PM.png; Screen Shot 2019-06-19 at 12.09.08 PM.png; Screen Shot 2019-06-14 at 11.16.19 AM.png; image.png; Screen Shot 2019-06-14 at 11.16.01 AM.png; Screen Shot 2019-06-14 at 4.28.18 PM.png; Screen Shot 2019-06-14 at 11.16.31 AM.png; image.png; image.png; image.png

Thank you, [REDACTED].
 Just saw the update.

Hope you have a great weekend as well.

On Fri, Jun 21, 2019 at 2:13 PM [REDACTED]@snap.com> wrote:
 Hi [REDACTED]

Confirming your LOC has been increased to \$300K.

Have a great weekend!

Cheers,
 [REDACTED]

On Fri, Jun 21, 2019 at 12:05 PM [REDACTED]@snap.com> wrote:
 Thank you for providing further information. We will connect with our finance team and keep you posted!

On Fri, Jun 21, 2019 at 11:59 AM [REDACTED]@tiktok.com> wrote:
 Hello [REDACTED]

We are currently at \$3,000~\$3,500 and estimate our Daily Spend to be at \$9,000~\$10,000 by next week.
 As our first invoice is yet to be paid and on its way, if you can please initiate conversations to flag any potential issues as soon as possible, that would be great.
 Could you first confirm that the LOC ceiling can be raised? As you can see in our dashboard, we need it raised(minimum \$50k~\$100k) by next week.

Thank you very much.



On Fri, Jun 21, 2019 at 11:42 AM [REDACTED]@snap.com> wrote:

Hi [REDACTED]

If you're able to provide us with an estimated Daily Run Rate (Daily Spend), we can initiate conversations with our billing team.

As per your email, typically our billing team will look at factors such as payment history, to help determine the LOC ceiling.

Cheers,

[REDACTED]

On Fri, Jun 21, 2019 at 11:37 AM [REDACTED]@tiktok.com> wrote:

Happy Friday [REDACTED]

We will be good through the weekend but will most likely need to increase the LOC by next week.

Flagging any potential issues beforehand. How high can the LOC go? Will there be a ceiling? In the future, do we just keep increasing the LOC?

Thank you in advance.

Best,

On Fri, Jun 21, 2019 at 11:30 AM [REDACTED]@snap.com> wrote:

Hi [REDACTED]

Happy Friday! Thank you for your time earlier this week.

It is great to hear that Snapchat is driving high-quality users (strong ROI, high LTV). We are excited to help you ramp up further.

From a funding standpoint, we will keep a close eye on your LOC and increase if necessary. You currently have \$51,223.44 remaining.

If you have any further questions, please do not hesitate to reach out.

Cheers,

[REDACTED]

On Thu, Jun 20, 2019 at 6:59 PM [REDACTED]@tiktok.com> wrote:

[REDACTED] thank you for your time today.

- We will continue to optimize our ad sets while raising the cap and bids for our best-performing assets.
- One item I forgot to address, our LOC is currently capped at \$100k. Do we need to request for additional budget or are we good to continue buys after our first INVOICE is processed?
(As this would mandate that we are good for payment)

Thank you and hope you have a great evening.

On Thu, Jun 20, 2019 at 10:28 AM [REDACTED]@snapchat.com> wrote:
Also one additional note.

I wasn't able to locate this creative in your account so it might be served out of the Baidu Account.

We'd definitely recommend testing this video creative in your US account.

Screenshot below.



Thanks

On Thu, Jun 20, 2019 at 10:23 AM [REDACTED]@snapchat.com> wrote:
Hey [REDACTED] and team,

Feedback in **bold** below

- It seems as it is a bit harder to scale on Android with the same target bid. Please share the recommended target bids for Android and iOS as we look to scale as fast as possible.

I would look at the target bids when you're editing/creating new ad sets and bid as close to the suggest bid range as possible.

Suggested Bids

So, what bid guidance can Snap provide you with? When you create a Campaign, a **suggested** bid will appear under the 'Bid & Goal' field.

Bid 

Max Bid

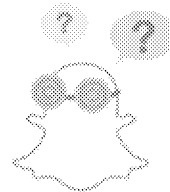


Suggested bid \$0.34 - \$0.97

A suggested bid is a recommended range based on average platform performance intended to give you a reference point when setting your bid. These estimates are optimization goal specific and should help you deliver against your specified daily budget.

Please Note: While they will help you bid more effectively, there's no guarantee that your Campaign will deliver in full. To give your Ad Set a better chance to spend through its daily budget, we encourage bidding on the higher end of the suggested range.

While our bid suggestions are currently based on average platform performance, we may use a different methodology in the future.



There are a number of factors that go into performance and delivery such as: bid, targeting, creative, and performance goals so we would recommend tweaking and increasing bids to find that sweet spot of performance and delivery.

Ad Total Value

An ad's total value is comprised of the following components:

- **Advertiser's Bid:** The amount entered by the advertiser that expresses how much they value the desired goal
- **Predicted Event Rates:** The probability that reflects how likely we believe a given user will take the desired event on the ad
- **Quality and Relevance:** A bid on behalf of the users' interests (i.e. if an ad has been flagged several times in the past for negative feedback, its quality component could reduce its total bid)



- At what specific eCPSU range do ads stop being served or given attention? It seems as though the Snap algo recognizes ads under about 50 cents and serves a lot of impressions to them but stops serving once the eCPSU hits a specific number. (example below)

3	USUG_May-CampaignA_06.03-06.09_AX : US_UG_RON_MF_13-		Active	1,194	\$0.27	61
2	USUG_May-CampaignA_06.03-06.09_AX : US_UG_RON_MF_13-		Active	10	\$0.73	4

There is no specific ECPSU range at which the campaign will stop serving but if the bids are too low relative to the suggest bid (i.e. \$1 bid vs \$10 suggested range), then our ad server will stop serving impressions against that ad set after a few days of not hitting performance and/or delivery goals until further optimizations are made.

- Deep-dive into below campaigns with the highest spend. (How can we optimize further? Why are these campaigns getting so much attention?)

USUG_May-CampaignA_06.03-06.09_AX

Bytedance 1233 US General Bits AX 0521

- Finally, look into campaigns with low spend. (Why are we having problems scaling? What needs to be changed/modified?)

In general these ad sets with the highest spend have some of the broadest targeting along with the best performing creatives including the one below which is why we're seeing more delivery against these ad sets.

However, you're not hitting your daily budgets across these ad sets either.

We'd recommend A) swapping out the worst creative out of the 2 creatives max per ad set and B) increasing bids where possible so that you'll have a better chance at competing for more users in the auction.



Approved

App Install

Date Created

May 28, 2019

Headline

It's all happening on TikTok!

IOS App ID

835599320

Thank you.

Speak soon.

On Wed, Jun 19, 2019 at 10:49 PM [REDACTED]@snap.com> wrote:
Thank you for your flexibility, [REDACTED] We will provide feedback prior to our call.

On Wed, Jun 19, 2019 at 4:07 PM [REDACTED]@tiktok.com> wrote:
Accepted the invite.
If you can reply to the above questions before our meeting, it would be of much help.
Looks like we are running into a few blockers while trying to scale.

Thank you.

On Wed, Jun 19, 2019 at 3:14 PM [REDACTED]@snapchat.com> wrote:
Hey [REDACTED]

Unfortunately I'm unavailable today as well.

5 should work but we'll confirm and [REDACTED] will update the invite.

Thanks

On Wed, Jun 19, 2019, 3:01 PM [REDACTED]@tiktok.com> wrote:
Is [REDACTED] available for a quick update today?
11~12, 2~3 and 5~6 work for tomorrow.

On Wed, Jun 19, 2019 at 2:45 PM [REDACTED]@snap.com> wrote:
Hi [REDACTED]

Happy Wednesday!

Apologies for the last minute request but would it be possible to shift our call to 4:30 PM tomorrow?

Thanks,
[REDACTED]

On Wed, Jun 19, 2019 at 2:29 PM [REDACTED]@tiktok.com> wrote:
Hello [REDACTED]
Sending over a few discussion items before our 4 PM weekly.

6/19(Wed.)

- It seems as it is a bit harder to scale on Android with the same target bid. Please share the recommended target bids for Android and iOS as we look to scale as fast as possible.

- At what specific eCPSU range do ads stop being served or given attention? It seems as though the Snap algo recognizes ads under about 50 cents and serves a lot of impressions to them but stops serving once the eCPSU hits a specific number. (example below)

3		Active	1,194	\$0.27
USUG_May-CampaignA_06.03-06.09_AX : US_UG_RON_MF_13-				
2		Active	10	\$0.73
USUG_May-CampaignA_06.03-06.09_AX : US_UG_RON_MF_13-				

- Deep-dive into below campaigns with the highest spend. (How can we optimize further? Why are these campaigns getting so much attention?)

USUG May-CampaignA 06.03-06.09 AX

Bytedance 1233 US General Bits AX 0521

- Finally, look into campaigns with low spend. (Why are we having problems scaling? What needs to be changed/modified?)

Thank you.

Speak soon.

On Mon, Jun 17, 2019 at 3:31 PM [REDACTED]@snap.com> wrote:

Hi [REDACTED]

I hope you had a great weekend!

Since Snap Ads Manager is a self-serve platform, unfortunately we're unable to provide a counter-signed document for billing purposes.

Our legal team has kindly drafted up an email covering our online payments terms. Would it be possible to share with your finance team?

Thanks,

[REDACTED]

On Sun, Jun 16, 2019 at 2:03 PM [REDACTED]@snap.com> wrote:

Hi [REDACTED]

Please feel free to share the following Cannes event invite with [REDACTED]



From my understanding, [REDACTED] our Chief Business Officer will be in attendance.

Have a great afternoon!

Cheers,
[REDACTED]

On Sun, Jun 16, 2019 at 11:41 AM [REDACTED]@tiktok.com> wrote:

Hello [REDACTED]

Also, will anyone from the Snap sales team be at Cannes mobile lions this upcoming week? Would be great to put them in touch with Julia while she is there.

Thanks!

On Sun, Jun 16, 2019 at 11:36 AM [REDACTED]@tiktok.com> wrote:

Thank you [REDACTED]

Much appreciated.

On Sat, Jun 15, 2019 at 4:01 PM [REDACTED]@snap.com> wrote:

Hi [REDACTED]

We are currently working with both legal and billing regarding this matter.

If we anticipate further delays, we will request a grace period on your behalf.

Have a great weekend!

Thanks,
[REDACTED]

On Fri, Jun 14, 2019 at 5:36 PM [REDACTED]@tiktok.com> wrote:

Hello [REDACTED]

Will update the billing entity and confirm.

Well noted. Will be on standby regarding the counter-sign.

As this is our very first invoice, will you be able to provide a few days grace period in the case that we lose a few days due to back and forth?

Thank you.

On Fri, Jun 14, 2019 at 4:36 PM [REDACTED]@snap.com> wrote:

Hi [REDACTED]

To update the billing entity and address, please navigate to the 'Business Details' page within Snap Ads Manager and click the 'Edit' button:

Business Details ▾

Bytedance Inc. - Executive Viewer, SAM

Organization dca2837e-8018-436e-bf73-e1b68f800468



1

Payment Methods



1

Ad Accounts



5

Members

Billing Centers

NAME	EMAIL ADDRESS	STREET ADDRESS	CITY/TOWN	STATE/PROVINCE	POSTAL CODE	COUNTRY
Bytedance Inc.	bryan.kim@bytedance.-com	10100 Venice Blvd	Culver City	California	90232	United States

Would you kindly confirm once completed, incase we need to re-issue the May invoice?

Finally, we will re-connect with our legal team regarding a counter-signed document and provide feedback early next week.

Have a great weekend!

Thanks,

[REDACTED]

On Fri, Jun 14, 2019 at 3:16 PM [REDACTED]@tiktok.com> wrote:

Hello [REDACTED]

Thank you for the insights above. Very helpful. Will ramp up on certain campaigns before the weekend.

Regarding payment, our one outstanding issue, is there any way your team can get a stamp or signature on the attached 2 documents?

If it still holds that they cannot, is there any other document that can be countersigned? Our finance team needs a "binding" document with signatures from both parties to process payment. I also made an inquiry about a virtual credit card, but as we look to ramp up our budget significantly, do not see this as a viable option.

Please advise on the best way for us to process payment. Do not wish to have this blocker curtail our process in any way.

- Also, could you please change the entity on the INVOICE to info below? Finance advised that everything processed in the U.S. needs to fall under the below entity name.

MUSICAL.LY INC
1920 Olympic Blvd.
Santa Monica CA 90404
United States

Thank you very much again.

On Fri, Jun 14, 2019 at 11:23 AM [REDACTED]@snap.com> wrote:

Hi [REDACTED] & Team,

It was great to connect earlier this week! In summary:

Campaign Highlights

- **Age:** 13-20 is the most efficient age group (consider breaking out 13-20, 21+)
- **Gender:** Female targeting is outperforming male targeting
- **Operating System:** Android is slightly more efficient than iOS
- **Ad Type:** Story Ads are the top-performing ad format (roll out more Story Ads)
- **Bid Type:** Target Cost Bid is driving the most efficient CPI

Scaling Budgets

- Please refer to the campaign report attached, covering the period 5/16-6/14.
- We would recommend increasing budgets against those campaigns highlighted in yellow.
- If you're running into scale issues, let us know and we can help troubleshoot.

Recent Ad Rejections



Rejected

App Install

The ad seems to promote, glorify or excele
feature weapons, ammunitions, or explo
This may include physical gestures that in
the use of a weapon.

Headline

It's all happening on TikTok!

IOS App ID
835599320

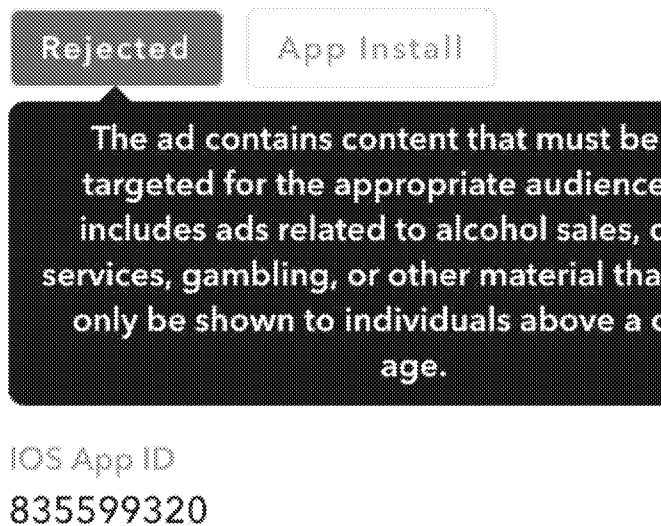
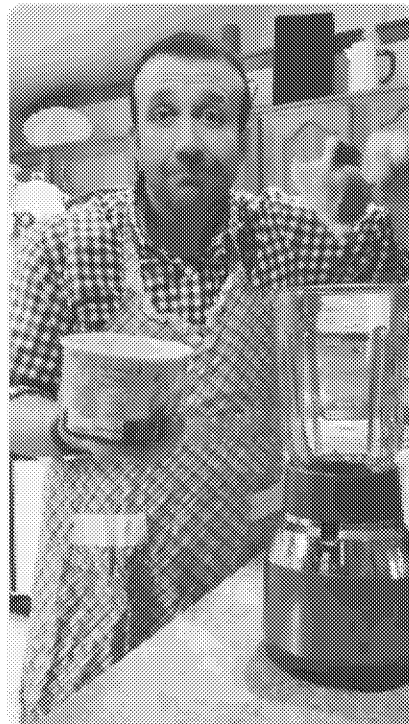


Rejected

App Install

The ad contains letterboxing (i.e. rectangular boxes without graphics, animation, or sound) located on the top and bottom of a creative. The majority of the ad. This includes static textured content. Please adjust and resubmit to encourage a vertical full screen ad experience.

IOS App ID
835599320



Delivery Insights

- Confirming this tool has been enabled on your ad account.
- To access, navigate to a campaign and select 'Delivery Insights' from the drop-down menu (top-right).

In-Person Session

- Is the team available for a platform overview on July 1 or 2?

Outstanding Invoice

- Please keep us posted regarding the outstanding May invoice.

If you have any further questions, please do not hesitate to reach out.

Thanks,

[REDACTED]
On Mon, Jun 10, 2019 at 12:04 PM [REDACTED]@snap.com> wrote:
Hi [REDACTED]

Thank you for discussing further with your finance team.

Would you kindly confirm whether the invoice on file mirrors the PDF attached (containing the Snap, Inc header)?

If a signature is required, we will endeavor to explore other solutions.

Cheers,
[REDACTED]

On Mon, Jun 10, 2019 at 11:13 AM [REDACTED]@tiktok.com> wrote:

Thank you [REDACTED]

Will pass this information along to our central finance team.

If we still require a signed document of any kind, is there any form of compromise that we can find?
(They need a signature or a stamp on any document for their records)

I will push to have this fully executed as soon as possible and also look into how other teams have processed for our other campaigns.

Best,

On Mon, Jun 10, 2019 at 11:01 AM [REDACTED]@snap.com> wrote:
Hi [REDACTED]

Happy Monday!

To clarify, by signing-up to Snap Ads Manager, ByteDance has agreed to both the Snap Payment and Self-Self Advertising Terms (legally binding contract).

Furthermore, unfortunately our legal team is unable to provide a signed copy of the terms hosted on our website.

Please advise whether we can provide any further information, to assist with the payment process.

Cheers,
[REDACTED]

On Fri, Jun 7, 2019 at 4:53 PM [REDACTED]@snap.com> wrote:
Hi [REDACTED]

Confirming receipt of your email. We will discuss with Snap Legal and keep you posted.

Have a great weekend!

Cheers,
[REDACTED]

On Fri, Jun 7, 2019 at 4:17 PM [REDACTED]@tiktok.com> wrote:
Hello [REDACTED]

Just a heads up before the weekend.

We received the May invoice but it looks like our finance team needs at least 1 countersigned document between parties to process payment.

Understand that our account is a self-serve account without any contracts, but would you be able to receive a stamp or signature of any kind on either of the attached documents?

Much appreciated.

On Wed, Jun 5, 2019 at 6:06 PM [REDACTED]@tiktok.com> wrote:
Great! Thank you, [REDACTED]

Adding [REDACTED] to the chain as well for visibility.
Will follow up regarding the internal report.

On Wed, Jun 5, 2019 at 5:56 PM [REDACTED]@snap.com> wrote:
Hi [REDACTED] & Team,

Thank you again for your time earlier today! In summary:

- Snapchat tracks App Installs (via AppsFlyer) / TikTok tracks Unique App Activations
- To manually control ad delivery, create separate ad sets (each containing a single ad)
- Useful Links
 - [Bid Strategies](#)
 - [How Goal-Based Bidding Impacts Auction Dynamics](#)
 - [Pre-Defined Audiences](#)
- Please keep us posted regarding the internal report, broken out by campaign/ad set/day

Finally, we recently added a subscribe feature to our blog. [Subscribe](#) to receive the latest Snapchat news.

Have a great evening!

Cheers,

[REDACTED]

On Wed, Jun 5, 2019 at 3:45 PM [REDACTED]@snap.com> wrote:

Hi [REDACTED]

Happy Wednesday!

Confirming receipt of your email. We look forward to discussing in further detail shortly.

Thanks,

[REDACTED]

--

[REDACTED]
Account Executive, Snap Inc.
917-601-0169

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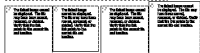


[REDACTED]

User Growth

[REDACTED]@bytedance.com

www.tiktok.com



DOCUMENT METADATA

Bates Number: TIKTOK3047MDL-023-00673467-TIKTOK3047MDL-023-00673486

BEGATTACH: TIKTOK3047MDL-023-00673467

ENDATTACH: TIKTOK3047MDL-023-00673486

Attachment Count: 0

PRODVOL: TIKTOK3047MDL-023

Custodian: JULIA YAN

File Path: /000226810.EML

Confidentiality Designation: CONFIDENTIAL

HASHVALUE: 7E005CF01B149A884C8875E8F30A53B1

DocType:

Author:

Create Date: 5/9/2024 12:00 AM

Last Modified Date: 5/11/2024 12:00 AM

LAST MODIFIED BY:

TRACK CHANGES:

COMMENTS:

HASHIDDENATA:

Filename: 000226810.EML

Title:

DOCEXT: EML

Email From: [REDACTED] TIKTOK.COM>

Email To: [REDACTED]@SNAP.COM>

Email CC: [REDACTED]@BYTEDANCE.COM>; [REDACTED]
[REDACTED]@SNAPCHAT.COM>; JULIA YAN [REDACTED]@BYTEDANCE.COM>; [REDACTED]
[REDACTED]@BYTEDANCE.COM>; [REDACTED]@BYTEDANCE.COM>

Email BCC:

Received Date: 6/21/2019 9:32 PM

Sent Date: 6/21/2019 9:32 PM

TIMEZONE:

Case 4:22-md-03047-YGR Document 2875-24 Filed 03/25/26 Page 23 of 23

Subject: RE: [EXTERNAL EMAIL] RE: SNAP INTRODUCTION

THREADID:

REDACTIONS: 0

REDACTION TYPE: