

AMENDED Exhibit 431

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: Alex Zhu [REDACTED]@bytedance.com]
Sent: 3/28/2019 8:37:55 AM
To: Vanessa Pappas [REDACTED]@bytedance.com]; Julia Yan [REDACTED]@bytedance.com]
CC: [REDACTED]@bytedance.com; growth@bytedance.com; [REDACTED]@bytedance.com; [REDACTED]@bytedance.com; [REDACTED]@bytedance.com; [REDACTED]@bytedance.com; [REDACTED]@bytedance.com; [REDACTED]@bytedance.com]; 朱文佳 [REDACTED]@bytedance.com]; [REDACTED]@bytedance.com]; [REDACTED]@bytedance.com]
Subject: Re: 【Paid Ads 投放调整 / Paid Ads Adjustment】针对美国市场尝试放开高龄限制 / removed age filter in US market

approved

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From: Vanessa Pappas [REDACTED]@bytedance.com>
Sent: Thursday, March 28, 2019 1:53:14 PM
To: Julia Yan
Cc: Alex Zhu; [REDACTED]@bytedance.com; growth@bytedance.com; [REDACTED]@bytedance.com;
[REDACTED]@bytedance.com; [REDACTED]@bytedance.com; [REDACTED]
Subject: Re: 【Paid Ads 投放调整 / Paid Ads Adjustment】 针对美国市场尝试放开高龄限制 / removed age filter in US market

Approved assuming all existing assets go through new policy.

On Wed, Mar 27, 2019 at 10:01 PM Julia Yan <[REDACTED]@bytedance.com> wrote:
Hi Vanessa and Alex,

Confirming that UG will follow the new CCM policy on paid ad assets for this test. Can you please confirm that we can start removing age filters on our paid channels in the US market? We would like to launch both asset standard update and age filter removal at the same time ASAP.

Thanks,
Julia

On Mon, Mar 18, 2019 at 4:52 AM Alex Zhu <[REDACTED]@bytedance.com> wrote:
Yes we must

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From: Vanessa Pappas [REDACTED]@bytedance.com>
Sent: Monday, March 18, 2019 3:16:44 PM
To: Alex Zhu
Cc: [REDACTED]growth@bytedance.com [REDACTED]@bytedance.com;
 [REDACTED]@bytedance.com [REDACTED]@bytedance.com [REDACTED]@bytedance.com; [REDACTED]
 [REDACTED]@bytedance.com

Subject: Re: 【Paid Ads 投放调整 / Paid Ads Adjustment】针对美国市场尝试放开高龄限制 / removed age filter in US market

Can we fix our paid asset quality prior to the test?

On Fri, Mar 15, 2019 at 4:26 PM Alex Zhu <[REDACTED]@bytedance.com> wrote:
confirmed

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收件人: [REDACTED]@bytedance.com>

发送时间: 星期五, 三月 15, 2019 6:35 下午

收件人: [REDACTED]@bytedance.com; [REDACTED]@bytedance.com; growth@bytedance.com; [REDACTED]

[REDACTED]@bytedance.com; [REDACTED]@bytedance.com; [REDACTED]@bytedance.com

抄送: [REDACTED]@bytedance.com; [REDACTED]@bytedance.com; [REDACTED]@bytedance.com

主题: 【Paid Ads 投放调整 / Paid Ads Adjustment】针对美国市场尝试放开高龄限制 / removed age filter in US market

Dear All:

Based on our discussion about US user growth meeting, the goal for US market is user generalization, L2 Male and even other tribes would be our target users. So we have aligned to do a test on changing paid acquisition strategy—the age targeting will be removed for paid ads acquisition.

Adjustment method: Focus on our target user's acquisition and CPI, removed user age targeting (Which means no longer limit Ads exposure to just 18+ user). In our expectation there would be more traffic onto Google.

ROI calculation method :

(Target user's LT) x Arppu / (Total cost / Target user's install)

Data to track:

1. Target user's install & ROI
2. Retention of the target user
3. Over all CPI cost

After adjustment, the optimal channel and bidding strategy will be explored according to the actual situation, and a updated bimonthly budget will be produced in two weeks. And we think the test would be running for 1 month, so the conclusion would be provided on end of April.

DOCUMENT METADATA

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Custodian: ALEX ZHU; JULIA YAN; VANESSA PAPPAS; WENJIA ZHU

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Email From: ALEX ZHU [REDACTED]@BYTEDANCE.COM>

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Email BCC:

Received Date: 3/28/2019 8:37 AM

Case 4:22-md-03047-YGR

Document 2875-25

Filed 03/25/26

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Sent Date: 3/28/2019 8:37 AM

TIMEZONE:

Subject: RE: PAID ADS / PAID ADS ADJUSTMENT / REMOVED AGE FILTER IN US MARKET

THREADID:

REDACTIONS: N

REDACTION TYPE: