

AMENDED Exhibit 432

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

Content Programming Strategy (TikTok US)

MISSION

We help people discover the world and empower everyone to be a creator by featuring content and developing creative tools that reflect the diverse, adventurous, inclusive spirit of our community.

GOALS

1.

2. Goals:

1. Ecosystem

a. **Optimize for longterm growth.** Find an appropriate balance between paid and organic priorities to ensure we're driving maximum engagement and growth over time.

b.

2. Strategy & Editorial

a. **Align on strategic priorities.** Establish a single source of truth for what we consider to be the most relevant, high-value editorial tentpole moments and audiences in the US market. This will allow us to think more holistically about campaigns and drive maximum engagement, amplification, and innovation around the events that matter most to our users.

b. **Establish Editorial Voice.** Align on a singular editorial voice that will guide how we portray ourselves in-app and online. This will allow us to have a clearer perspective and enable us to be consistent across editorial touchpoints.

c. **Plan ahead.** Provide all teams sufficient time to prepare for and collaborate on key campaigns; identify potential gaps in content calendar (or periods of oversaturation); and open up bandwidth to address more topical, impossible-to-plan-for events and trends.

3. Creative Tools

a.

1. **Create Clear Ownership of Responsibilities:** Identify key owners of editorial levers and finalize reporting processes and collaborative meetings. This will

Commented [1]: Algo distribution will show different people with different content based on their interests. I wonder how the editorial voice align with the algo distribution?

enable team members to more closely focus on core competencies and gain expertise in their areas.

AUDIENCE

Who is our target audience? We're aging up with a target of users that are 18+. Internally identified as High Level Users from L3 (18-20) and L4 (≥ 21). However, this does not mean eliminating or overlooking users from L1 and L2.

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How do we adjust content distribution and programming for our different age targets?

1. **Identify trends/events/programming opportunities with mass appeal that work across multiple age targets (e.g. #GoLong Challenge vs. #SuperBowl, #BirdBox, Animal stickers, Holidays).**
 - a. One of our core strengths is users from a variety of niche groups repackaging app-wide trends through their own unique lens. Primarily targeting malleable moments that work across the community is key. This appeals to both target audiences as well as L1 and L2.
 - b. Focus on prioritizing content for L3 and L4 that functions as aspirational for L1 and L2, such as an athlete posting physical challenges, Travel Vloggers, etc. We can curate programming for L3 and L4 while still serving L1 and L2.

COMPETITIVE LANDSCAPE

Key Competitors:

1. **How are we differentiated from other US social?**
 - a. **We avoid the bubble effect:** Users are served content from outside of their preferred type on a consistent basis, creating an app where communities consistently interact and come around challenges/trends regardless of origin point.
 - b. **We are raw, fresh and celebrate everyone and everything, including the mundane:** Most social apps have tended to focus on aspirational content, creating communities where carefully manicured images are key. We celebrate creators from all communities and all walks of life. We also celebrate the mundane, such as a janitor dancing at work or firefighters

taking part in a transformation challenge, both in-app and in owned channels.

c. We empower users to explore the world and their own creativity:

TikTok gives everyone the creative tools to discover everything within them and new sides of themselves by breaking barriers to creation (creation tools: sounds, filters, etc.).

2. Competitor Focus

a. Instagram/IGTV

- i. Uses in-app Discovery to drive usage rates around niche communities. Uses owned levers primarily for branding and larger campaigns, with a heavy focus on curating content that is visually interesting and aspirational. Monetization informs brand deals.
- ii. They provide users with safety by making sure they have all the tools they need to look perfect. Highly curated with growing meme communities.
- iii. **Key Strength:** Scale, ease-of-use and subtlety. Minimal social presence allows brand to speak for itself.
- iv. **Key Issues:** Can be seen as curated to such an extent that it comes across as fake. Not true of actual lived experiences.

b. YouTube

- i. Uses in-app and owned levers to drive users to popular culture content, with the intention of leveraging entertainment partnerships to create perspective that YouTube is the culture.
- ii. Grew from small-scale creators, but has largely moved on to favor entertainment personalities and top-tier creators as faces of the brand to improve usage rates among target audiences.
- iii. **Key Strength:** Scale and top-tier entertainment partnerships ensures that YouTube is always top-of-mind. Creator Monetization.
- iv. **Key Issues:** Seen as out-of-touch with digital culture, viewed as manufacturing content and trends, negatively associated with favoring entertainment partners over endemic creators. Brand Safety considerations.

c. Snapchat

- i. Uses in-app levers to drive users to publishers. Owned levers are diverse. Struggles to offer a clear vision of intention, to detriment of growth.
- ii. They give users the feeling they are "the one" by providing them with the most intimate messenger they desire.
- iii. **Key Strength:** Creative tools and partnerships are top-notch.

- iv. **Key Issues:** Unclear vision and app structure minimizes potential usage growth. Not used by youngest generation. Zero social presence veers too far into letting the brand speak for itself.

3. TikTok Review

- Uses in-app levers to drive users to viral content. Owned levers primarily used to curate high-quality content.
- TikTok empowers everyone to explore themselves and a world beyond their own.
- Key Strength:** Mass appeal, diversity of content and ease of use. Niche communities in-app allow users of all type to find their preferred type of content while also being exposed to content outside of their bubble.
- Key Issues:** Content can be too young and immature. Ads create perception that TikTok is “cringe.”

PROGRAMMING LENS

[HYPERLINK

1. How do we balance UGC, PGC and Creator Content?

a. UGC is the permanent priority.

- i. We're content first. The algorithm is designed to surface viral content, regardless of source. This will continue to be key as we build our editorial strategy around both pre-planned tentpoles as well as work with our community to capture unexpected, viral moments.

b. How does PGC fit?

- i. We'll continue to evaluate PGC as results come in, with the intention that as long as PGC does not negatively impact UGC, PGC will fill in specific gaps in content diversity, enabling us to nurture and grow underdeveloped communities.

c. Creator Content

- i. Creators act as a reliable base, providing brand evangelists and quality content. We'll continue to regularly surface and leverage high-quality Creator content, while making Creators a key part of editorial tentpoles and campaigns.

KEY METRICS

OKRS

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FUTURE OBJECTIVES

1. **Better influence UG ads to more closely align with editorial strategy.** This will enable us to maintain more consistency across user journey, better aligning true user experience with what's promised through ads.
2. **Become involved with In-App and Social Creative for Brand Campaigns at earlier phase.** Acting as an editorial and creative expert will enable us to ensure that creative aligns closely with editorial reality.

RESOURCES

1. Master Programming Calendar
2. Master Cal Guidelines
3. Master Cal Request Form
4. Social Content Request Form
5. Style Guide

DOCUMENT METADATA

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