

AMENDED Exhibit 453

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

PTA / FOSI Working Group

2020-02-21 13:45:00

What do you think of having or not having a videographer in LA? One quoted me \$9K (overpriced for only 1 crew member). TT in-house video crew declined to provide video service. They referred me to someone else, who I'm speaking with today.

2020-02-21 18:13:00

We don't need another videographer. One event is enough :)

2020-02-21 18:13:00

I think the fl footage will be great and showcase this initiative well

THUMBSUP 2020-02-21 18:14:25

2020-02-21 18:14:00

@ Good to know! I thought the cost was high with everyone I reached out to in LA, and likely not worth flying out the DC videographers with a week notice. Whew. How about a photographer for higher res photos?

2020-02-21 18:15:00

Let me check if there's someone internally who take good photos actually :)

2020-02-21 18:15:00

I think we can probably just take our photos.

2020-02-21 18:16:00

I have a professional camera and can bring that too. Perfect.

2020-02-25 01:57:00

@ <https://www.tiktok.com/> is our confirmed creator for Thursday! is a student and DIY creator. She spoke at a TikTok panel this weekend in LA. I'll work to set-up a Comms call Tuesday or Wednesday with her.

OK 2020-02-25 02:03:15

2020-02-25 02:03:00

Thank you! I'll do some research on this

THUMBSUP 2020-02-25 02:03:45

2020-02-25 04:06:00

Call slated for Tuesday at 1pm PT

THUMBSUP 2020-02-25 04:16:00

2020-02-25 17:33:00

Slides for [REDACTED]. Feel free to change or edit presentation notes:

THUMBSUP 2020-02-25 20:59:22

2020-02-26 19:43:00

do you have the agenda for tomorrow? I need to add it to the media alert.

2020-02-26 20:39:00

4:00pm - Event set-up/TikTok staff arrival 5:00pm - 5:30pm - TikTok creator [REDACTED] arrival 6:00pm - Doors open & snacks 6:20pm - PTA Welcome & intro to TikTok creator [REDACTED] presentation [REDACTED] 6:30pm - Student panel 7:00pm - Online scenario activity 7:30pm - SmartTalk and digital safety resources 7:35pm - Wrap-up

2020-02-26 20:42:00

Do we know who is speaking? If there are sponsors besides us? Who is speaking on behalf of the PTA?

2020-02-26 20:45:00

I was told it was the local PTA leader - let me re-confirm their name and this is still true.

THUMBSUP 2020-02-26 21:00:53

2020-02-26 22:33:00

No other companies or speakers. Only [REDACTED] 2 parents are facilitating student panel. Re other companies or safety experts: this is something that the National PTA battles with local PTA on. National PTA said they are considering creating a matrix/rubric for the local leader to use on deciding whether or not someone is a speaker that is relevant and a good fit.

2020-02-26 22:33:00

The upside to giving them autonomy is that they themselves buy in so much more and may be why we are seeing so much success at our events. 🐼

2020-02-27 02:15:00

Question from PTA leader, -- Do we want to introduce someone from TikTok, then TikTok introduces the creator? I'm inclined to keep the agenda the way it is & have intro But I'm open to either.

2020-02-27 03:47:00

Let's keep as is.

THUMBSUP 2020-02-27 16:06:46

2020-02-27 03:48:00

I have channel kcal, cbs and abc confirmed to attend. It's one crew that shoots for all of them.

2020-02-27 16:07:00

Just noticed our creator today made a tiktoktips video, posted yesterday! - <https://vm.tiktok.com/b7kGjC/>

2020-02-27 16:52:00

yes. We asked her to do it :)

2020-02-27 16:53:00

Might be nice to add to the slides. It's cute.

2020-02-28 02:21:00

Good looking crowd!

2020-02-28 02:38:00



Eric Ebenstein 2020-02-28 02:39:00

Holy crap that's a lotta ppl

[REDACTED] 2020-02-28 03:04:00

It's packed. Unfortunately the news crews cancelled bc there's some late breaking news.

[REDACTED] 2020-02-28 03:08:00

I'm sort of glad the crews cancelled. This student panel is primarily under 13 and they're all talking about what they post why they post and how they know they're not supposed to have an account.

Eric Ebenstein 2020-02-28 03:09:00

[REDACTED] what?!! How is PTA letting that happen?

[REDACTED] 2020-02-28 03:10:00

I don't know. But seriously dodged a bullet. That would have been on cbs abc and kcal9.

[REDACTED] 2020-02-28 03:11:00

They also showed some of their videos on the monitor

[REDACTED] 2020-02-28 03:12:00

@Eric Ebenstein unfortunately they asked for questions from the crowd and a parent asked "how old were you when you started using social media." All of them said btwn ages 8-12 and admitted to lying about their birthdate to get around it. One girl said she's 20 on Instagram

[REDACTED] 2020-02-28 03:13:00

[REDACTED] they were introduced with their grades and showed their TikTok accounts as part of the intro. It's learnings for the future.

Eric Ebenstein 2020-02-28 03:18:00

we need a quick post mortem on this one so I can talk to

THUMBSUP 2020-02-28 03:24:50

2020-02-28 03:20:00

LA Parent mag is here. They just messaged me. They said they're leaving and thanked me. I'll work with them after.

2020-03-04 18:20:00

I added you to an email with the Los Feliz PTA president. She needs China talking points to share with concerned parents. Sharing screenshot here for @Eric Ebenstein awareness.

2020-03-04 18:20:00

China is our top priority for our new digital parenting campaign. We need to make sure we have the right talking points to share with concerned parents. I added you to an email with the Los Feliz PTA president. She needs China talking points to share with concerned parents. Sharing screenshot here for @Eric Ebenstein awareness.

Eric Ebenstein 2020-03-04 18:21:00

lets be sure to connect with her via phone, rather than over email. I'm sure has what she needs, but feel free to reach out if you want any additional talkers.

THUMBSUP 2020-03-04 18:22:45

2020-03-09 17:25:00

First draft of highlight reel!

2020-03-17 19:35:00

Wonder if there's an opportunity to lean on our existing relationships with National PTA or FOSI around good digital parenting while staying at home, or adapting any programming/resources. Inspired by FOSI's recent blog post on this topic. https://www.fosi.org/good-digital-parenting/good-digital-parenting-while-staying-home/?utm_source=FOSI+Subscribers&utm_campaign=9b1e7bb94e-EMAIL_Across_Generations_Invite_COPY_02&utm_medium=email&utm_term=0_800d47c6d0-9b1e7bb94e-302948793&mc_cid=9b1e7bb94e&mc_eid=826421ec7c

2020-03-17 21:13:00

I'm pulling content for best corona virus hacks from parents, and an add the FOSI tips to that.

THUMBSUP 2020-03-17 21:13:17

2020-03-18 02:46:00

sharing that PTA tweeted their page of parent tips:
<https://npta.informz.net/informzdataservice/onlineversion/ind/bWfPbGluZ2luc3RhbmNlaWQ9MjkwNDc0OSZzdWJzY3JpYmVyaWQ9MzY0NzI3NDIz>

THUMBSUP 2020-03-18 03:36:37

2020-04-08 04:55:00

This is nice. A high school principal in Alabama on TikTok: "We really were trying to come up with some ideas to keep our kids connected to the building while they're all home," he said. Mr. Richman has even challenged other buildings and staff to hop on TikTok and do the same."
<https://wbng.com/2020/04/07/tiktok-famous-how-binghamton-high-schools-principal-is-spreading-joy-on-social-media/>

Eric Ebenstein HEART 2020-04-08 12:55:37

2020-04-10 19:31:00

Whats the FOSI invoice from February 26 — do you need me to look into it?

Eric Ebenstein 2020-04-10 19:32:00

I'll check with

THUMBSUP 2020-04-10 19:32:58

2020-04-13 16:22:00

Hi there. The PTA video is set. What's our plan for releasing it? Are we thinking of putting it on the TikTok Youtube channel (We have a 'Life at TikTok' handle)?

Eric Ebenstein 2020-04-13 16:25:00

I think check to see what plans had for it and then after we're aligned show to MB with our suggested plan.

Eric Ebenstein 2020-04-13 16:25:00

Has PTA seen and signed off?

THUMBSUP 2020-04-13 16:26:08

2020-04-13 16:26:00

Yep they did today.

2020-04-13 16:29:00

They said they can't wait to share this out to showcase the great relationship we have already been building together and with local units. [REDACTED] loved the line about the young woman saying that parents should be on TikTok even if kids didn't want to hear that.

Eric Ebenstein THUMBSUP 2020-04-13 16:30:03

2020-04-13 16:57:00

@Eric Ebenstein we were going to use this video for press outreach ahead of in person events. Since we've put those on hold, I need to rethink how we can use this. It seems to e deaf to put on youtube right now.

2020-04-15 14:11:00

[REDACTED] team emailed me that they haven't received payment yet. I had told them on Friday that they would 'Tuesday by the latest', per message to me. Just letting you both know...[流泪]

Eric Ebenstein 2020-04-15 14:12:00

Let me ping again. Ugh.

Eric Ebenstein 2020-04-15 15:18:00

She gave us a UK payment address so if OA payment will need her W8ben

Eric Ebenstein 2020-04-15 15:18:00

Or cc payment and reimbursement

DOCUMENT METADATA

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THREADID:

REDACTIONS:

REDACTION TYPE: