

AMENDED Exhibit 458

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]@pta.org]
Sent: 1/12/2021 9:52:12 PM
To: [REDACTED]@pta.org]; [REDACTED]@tiktok.com]; [REDACTED]
[REDACTED]@tiktok.com]
CC: [REDACTED]@tiktok.com]; [REDACTED]@pta.org]; [REDACTED]@pta.org]
Subject: RE: [External] RE: quick request

+ [REDACTED] 😊

[REDACTED]
703-518-1228 Desk | [REDACTED] Mobile
[REDACTED]@pta.org | www.pta.org

[My pronouns: She/Her]

From: [REDACTED]@pta.org>
Sent: Tuesday, January 12, 2021 4:47 PM
To: [REDACTED]@tiktok.com>
Cc: [REDACTED]@pta.org>; [REDACTED]@tiktok.com>; [REDACTED]@pta.org>; [REDACTED]
[REDACTED]@pta.org>
Subject: RE: [External] RE: quick request

Hi [REDACTED],

We are good to go now on our quote. We made one more small change in the first sentence. Please find below our final quote. Thank you so much and sorry for the delay on this!

Best regards,
[REDACTED]

"National PTA applauds TikTok for advancing safe and age-appropriate experiences where teens can have fun and be creative. With TikTok's thoughtful changes to teens' privacy settings, National PTA continues to recommend that families sit down together, explore the app's safety controls and tools, and have open and ongoing conversations to help teens be safe and responsible online. This is particularly important to ensure teens' accounts are set up right from the start. PTA looks forward to continuing our important work with TikTok to educate families across the country about online safety." – [REDACTED]

From: [REDACTED]@tiktok.com>
Sent: Monday, January 11, 2021 3:17 PM
To: [REDACTED]@pta.org>
Cc: [REDACTED]@pta.org>; [REDACTED]@tiktok.com>; [REDACTED]@pta.org>; [REDACTED]
[REDACTED]@pta.org>
Subject: Re: [External] RE: quick request

Thanks! Will be thrilled to have the quote asap.

In addition to the quote, is the attached one pager something you'd be comfortable with having your quote positioned on?

It is not public, or final, so please don't share.

[REDACTED]

202 297-5355

[REDACTED]@tiktok.com

On Mon, Jan 11, 2021 at 9:17 AM [REDACTED]@pta.org> wrote:

Good morning [REDACTED]. I hope you had a nice weekend!

I just wanted to check in to let you know that we are just waiting for one final approval on our quote. We are close! I will be sure to let you know just as soon as we are all good to go on our end.

Thank you so much!

[REDACTED]

From: [REDACTED]@tiktok.com>

Sent: Friday, January 8, 2021 12:18 PM

To: [REDACTED]@pta.org>

Cc: [REDACTED]@pta.org>; [REDACTED]@tiktok.com>; [REDACTED]@pta.org>; [REDACTED]@pta.org>

Subject: Re: [External] RE: quick request

Perfect. Good on our end.

On Jan 8, 2021, at 11:59 AM, [REDACTED]@pta.org> wrote:

[REDACTED]

I hope you don't mind me interjecting here. I just chatted quickly with [REDACTED] to make sure we were aligned. We get what you are trying to achieve with those small tweaks, and we want to be helpful. We do also have to be extra careful to avoid endorsing language and to ensure we are consistent with our internal practices for statements on corporate products/platforms.

How about this?

"National PTA applauds TikTok for continuing to prioritize safe and age-appropriate experiences where teens can have fun and be creative. With TikTok's thoughtful* changes to teens' privacy settings, National PTA continues to recommend that families sit down together, explore the app's safety controls and tools, and have open and ongoing conversations to help teens be safe and responsible online. This is particularly important to ensure teens' accounts are set up right from the start. PTA looks forward to continuing our important work with TikTok to educate families across the country about online safety."

* Alternate word choices here could be:

- "With TikTok's most recent changes..."
- "With TikTok's latest changes..."

Does this work?

Thanks!

[REDACTED]

[REDACTED]

703-518-1228 Desk | [REDACTED] Mobile

[REDACTED]@pta.org | www.pta.org

[My pronouns: She/Her]

HEADS UP: OUT OF OFFICE UNTIL MONDAY, JANUARY 11

From: [REDACTED]@tiktok.com>
Sent: Friday, January 8, 2021 11:07 AM
To: [REDACTED]@pta.org>
Cc: [REDACTED]@tiktok.com>; [REDACTED]@pta.org>; [REDACTED]
[REDACTED]@pta.org>; [REDACTED]@pta.org>
Subject: Re: [External] RE: quick request

Hi everyone - here are some minor tweaks to your suggested quote from our end. If any questions or issues, please let me know:

"National PTA applauds TikTok for continuing to create safe and age-appropriate experiences where teens can have fun and be creative. With TikTok's innovative changes to teens' privacy settings, National PTA continues to recommend that families sit down together, explore the app's safety controls and tools, and have open and ongoing conversations to help teens be safe and responsible online. This is particularly important to ensure teens' accounts are set up right from the start. PTA looks forward to continuing our important work with TikTok to educate families across the country about online safety."

And in terms of your request for how it's going to look, please see the below. And please don't share past our immediate group/leadership on your end who needs to see. The safety partners you'll be among are the same as in the past.

CONFIDENTIAL — NOT FOR DISTRIBUTION

Strengthening privacy and safety for youth on TikTok

[REDACTED] TikTok

5am ET, Wednesday, January 13

At TikTok, we know that creativity and expression are personal. And so is privacy. That's why we empower our community with a range of controls to manage their online presence. As young people start their digital journey, we believe it's important to provide them with age-appropriate privacy settings and controls. Today we're announcing changes for users under age 18 aimed at driving higher default standards for user privacy and safety.

Enhanced default privacy settings

Starting today, we're changing the default privacy setting for all registered accounts under the age of 16 to private. With a private TikTok account, only someone who the user approves as a follower can view their videos. We want our younger users to be able to make informed choices about what and with whom they choose to share, which includes whether they want to open their account to public views. By engaging them early in their privacy journey, we can enable them to make more deliberate decisions about their online privacy.

Additional changes we're rolling out to promote a safe experience for our younger users include:

- Tightening the options for commenting on videos created by those under age 16. These users can now choose between Friends or No One for their account; the Everyone comment setting is being removed.
-
- Changing Duet and Stitch settings to now make these features available on content created by users age 16 and over only. For users aged 16-17, the default setting for Duet and Stitch will now be set to Friends.
-
- Allowing downloads of videos that have been created by users 16 and over only. Other users can decide whether they want to allow downloads of their videos, though for users aged 16-17 the default setting will now be changed to Off unless they decide to enable it.
-
- Setting "Suggest your account to others" to Off by default for users under 16.
-

Adjusting TikTok's default account settings to support stronger user privacy is a meaningful step in our ongoing commitment to keeping our younger users safe. These changes build on previous updates we've made to promote youth safety, including:

- Restricting direct messaging and hosting live streams to accounts 16 and over.
-
- Restricting the buying, sending, and receiving of virtual gifts to users 18 and over.
-
- Enabling parents and caregivers to set guardrails on their teen's TikTok experience through our Family Pairing features.
-

An update on TikTok for Younger Users

In the US, we accommodate users under 13 in a limited app experience, TikTok for Younger Users, which offers additional safeguards and privacy protections designed specifically for a younger audience. This experience allows users to browse a curated library of age-appropriate videos, and today we're pleased to announce a partnership with Common Sense Networks as we continue to improve upon this experience. Through our partnership, Common Sense Networks will provide additional guidance on the appropriateness of content for children under 13 as we work to create an enjoyable and safe viewing experience.

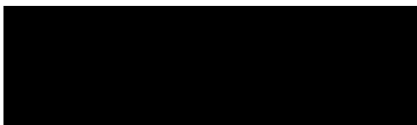
A pioneering approach to privacy

There's nothing more important than the safety and privacy of our community. We regularly publish Transparency Reports, and we continue to show experts and policymakers how we operate, moderate and recommend content, and secure user data at our Transparency and Accountability Centers. We also have privacy information on our Safety Center.

We know there is no finish line when it comes to protecting users and their privacy, and our investment in this important area won't stop here. We'll continue to evolve our policies, work closely with regulators and experts in minor safety, and invest in our technology and teams so that TikTok remains a safe place for everyone to express their creativity.

What youth safety experts are saying

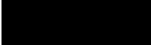
<PARTNER QUOTES>



202 297-5355

@tiktok.com

On Thu, Jan 7, 2021 at 4:27 PM @pta.org> wrote:

Hi ,

Thank you again for your time on Tuesday and for sharing with us the safety update you are making! As discussed, please find below a draft quote we put together to provide for your newsroom post. We are still moving this through approvals on our side but wanted to share what we have. If you could share the full newsroom post as soon as is possible and confirm the other organizations that will be providing quotes too, that would be great as we need to share these pieces with our draft quote as part of our final approvals. Thank you so much!

Best regards,

[REDACTED]

"National PTA applauds TikTok for continuing to take steps to keep youth safe as they have fun creating and connecting on the app. With the changes to the safety settings in the app for youth, National PTA continues to recommend that families sit down together and have open and ongoing conversations to help teens be responsible and safe creators. This is particularly important to ensure their accounts are set up right from the start." – [REDACTED]

From: [REDACTED]@tiktok.com>

Sent: Monday, January 4, 2021 9:27 AM

To: [REDACTED]@pta.org>; [REDACTED]@tiktok.com>

Cc: [REDACTED]@pta.org>; [REDACTED]@pta.org>; [REDACTED]
[REDACTED]@pta.org>

Subject: Re: [External] RE: quick request

Thanks so much and Happy New Year to you all as well!

Separately, I wanted to get time on your calendars this week to discuss a new safety update we are making that we'd like to run by you and secure a quote from the right PTA person, assuming agreement. Probably won't take longer than 30 minutes.

I'd also like to introduce you to my colleague, [REDACTED], who works with me in DC and is heavily involved with our lobbying efforts.

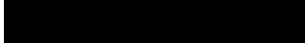
Tomorrow and Wednesday afternoons are decently open on my end.

Thanks again.



202 297-5355

@tiktok.com

On Mon, Jan 4, 2021 at 9:18 AM @pta.org> wrote:

Hi . Happy new year!

Thanks so much for running this by us! I have included a few edits in red text below.

Thank you again and all the best,



Parent education

In partnership with Connect Safely, the Family Online Safety Institute, and National PTA

TikTok has important partnerships with leading youth advocacy and safety organizations, including Connect Safely, the Family Online Safety Institute, and National PTA. Together, we help caregivers learn about TikTok and how their teen can be a safe and savvy internet user. We actively educate families about the safety tools built into TikTok.

TikTok provides support to PTA units across the US. These grants support online safety trainings and relief for families and communities in need of devices, meals, and other essentials. Learn more [<https://newsroom.tiktok.com/en-us/national-pta-expands-pta-connected-initiative-with-tiktok>]

From: [REDACTED]@pta.org>

Sent: Monday, January 4, 2021 8:18 AM

To: [REDACTED]@tiktok.com>; [REDACTED]@pta.org>; [REDACTED]@pta.org>; [REDACTED]@pta.org>

Subject: RE: quick request

Hi [REDACTED]

Happy New Year! I'm adding @ [REDACTED] so she can take a look and provide approval!

Best,

[REDACTED]

[REDACTED]

[REDACTED] (direct)

[REDACTED]@pta.org

From: [REDACTED]@tiktok.com>

Sent: Wednesday, December 30, 2020 12:11 PM

To: [REDACTED]@pta.org>; [REDACTED]@pta.org>; [REDACTED]@pta.org>

Subject: quick request

Hi! want to make sure that we have your approval (a simple "yes" to this email will suffice) to list you on our soon-to-be-redesigned safety center and safety partners page. It will be your name, hyperlink, and a small blurb about our joint efforts (past and forward looking)

something like this:

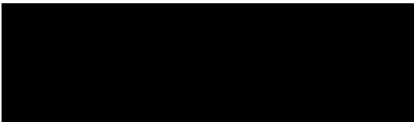
Parent education

In partnership with Connect Safely, the Family Online Safety Institute, and the National Parent-Teacher Association (PTA)

TikTok has important partnerships with leading youth safety organizations, including Connect Safely, the Family Online Safety Institute, and the National Parent-Teacher Association (PTA). Together, we help caregivers learn about TikTok and how their teen can be a safe and savvy internet user. We actively educate families about the safety tools built into TikTok.

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Thanks!



202 297-5355

@tiktok.com