

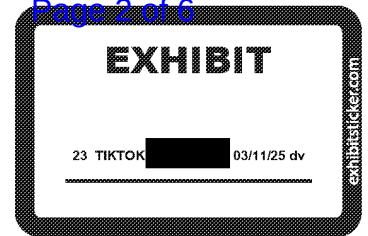
AMENDED Exhibit 461

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



**TikTok Teen Education and Awareness Program
May 2023**

Objective: TikTok and Common Sense Networks (“CSN”) have shared interest in collaborating on the well-being of TikTok’s teen users. The objective is to deliver an education and awareness program designed to educate parents, educators, teens, and the industry on TikTok’s teen experience and empower teens to take ownership of their digital lives.

To ensure alignment and effective planning and delivery of the program, the parties will collaborate on the appropriate guidelines, resources, and related roadmap for teens. Agreement on those guidelines and plans will form the basis for a broad and ongoing awareness program.

The subject matter of the program will be a combination of materials that address important themes relevant to teens’ consumption and creation of digital media. The program would be delivered through an editorial calendar that includes event and on-platform resources, which will incorporate preventative, real-time, and remediation strategies.

Audience: Resources will support and be directed at the appropriate audiences, including teens, parents, caregivers, and educators.

Research & Planning: Prior to the development of resources, parties will collaborate on the necessary research and planning, including but not limited to:

- Research to inform program themes, elements or help determine what is useful and necessary (i.e. information gathering from parents / teens / teachers)
- Identifying existing or planned TikTok tools and features (e.g. safety features such as Privacy Settings, Family Pairing and Screen Time Controls) to be highlighted and promoted throughout program resources
- Identify mission-aligned individuals, brands, and organizations to collaborate and partner with to amplify the impact of the program (e.g. National PTA, Unilever, experts in the field, etc.)

Program Themes: TikTok to choose one thematic focus per quarter. For each theme, the positive role or aspects of TikTok and/or relevant tools or features will be highlighted. Potential themes include:

- Media Balance & Well-being
 - Go beyond screen time to explore the impact their digital lives can have on their well-being and relationships while learning to balance TikTok use in their everyday lives; this includes highlighting TikTok’s digital well-being tools and features.
- Digital Footprint & Identity
 - Consider the benefits and risks of online sharing and explore how a digital persona on TikTok can affect one's sense of self, reputation, and relationships.

- Understand the correlation between one's digital profile and usage and promotional content
- Digital Relationships & Communication
 - Reflect on how to have positive online interactions and relationships through TikTok.
- Media Literacy: Misinformation & Hoaxes
 - Assess information sources (including viral warnings) and reflect on how to be responsible and thoughtful TikTok creators and consumers.
- Media Literacy: Challenges
 - Assess online challenges and trends, and reflect on how to be responsible and thoughtful media participants; this includes TikTok's Stop, think, decide, act approach.
- Creator Guidelines for Teens
 - How teens can be responsible and thoughtful TikTok creators.
- Creating for Teens
 - How to create TikTok beneficial content for teen audiences responsibly and thoughtfully.
- TikTok in the Classroom
 - How TikTok can be a complement to classrooms (and not a detractor); this includes highlighting the STEM feed.

Education & Awareness Program Framework: Parties to collaborate on planning and execution of the following quarterly program components:

- CSN to develop event resources (focusing on prevention, real-time, and remediation)
 - Live event
 - Presenter's guide for webinar, in-person conference, presentation, or workshop
 - Community-led event
 - Live option: Presenter's guide for schools, communities, local organizations, etc. to lead their own local events
 - Self-paced option: Learning module(s) targeting a specific audience (i.e. parents, school, educators, or teens)
- Co-authored resources
 - Materials for resource center that highlight key information from the live event
 - Newsletter highlighting key information from the event, on-platform resources, and relevant videos
- CSN to advise on on-platform resources, including influencer campaigns
 - Pre-event PSA TikToks promoting theme and/or event (getting the word out)
 - Post-event TikToks sharing/showcasing key information and resources to reinforce the quarterly theme

- TikToks promoting messaging, features, or tools
 - Interactive TikToks (polls & questions) intended to serve as micro learning activities—could be served via search terms, in feed (FYP), or live in resource center
 - Hashtag campaign (e.g. challenges and calls to action) that educates users and invites users to post TikToks related to the theme (e.g. #tiktoktaughtme, #learnontiktok, #factcheckyourfeed)
- Evaluation
 - TikTok to evaluate the program's effectiveness—by tracking metrics such as engagement, reach, and awareness levels—and share with CSN to inform future programming.

Term: 12 months

Pricing and Payment Cycle: To be added in a Statement of Work to be drafted after the parties discuss scope and proposed use of Common Sense brand.

Questions

- How will the Common Sense brand be used (i.e. events, resources, promotion, etc.)?
- How will the partnership be positioned externally?
- Who will host live events? Who will deliver live events?

DOCUMENT METADATA

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Case 4:22-md-03047-YGR Document 2650-23 Filed 01/20/26 Page 6 of 6

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