

AMENDED Exhibit 463

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

EXHIBIT

51 TIKTOK EBENSTEIN 3/11/25 dv

exhibitsticker.com

Eric Ebenstein和Eric Han的单聊

Eric Han 2019-05-15 17:24:00

The Facebook folks I know worked with him previously and they intro'd him as the founder of Life After Hate -- which is not technically a lie, I guess

Eric Ebenstein 2019-05-15 17:24:00

not at all. really helpful.

Eric Han 2019-05-15 17:24:00

[赞]

Eric Ebenstein 2019-05-28 15:41:00

Hey. Hope you had a good long weekend. I had a great conversation with the Southern Poverty Law Center today. Are you the right person to be connected with some of their internal resources on keeping hate speech off the site?

Eric Han 2019-05-29 03:24:00

Hey, yep, I'll be that person. Happy to chat :)

Eric Ebenstein 2019-06-05 18:04:00

Another worthwhile intro sent your way via email. Let me know if you have questions (or want me to stop!)

Eric Han 2019-06-05 19:38:00

i saw! thanks very much. replying back now. (keep them coming)

Eric Ebenstein 2019-06-17 11:11:00

Hi - hope you had a good weekend. Just wanted to check in and see how things were going. Anything interesting happening in your world?

Eric Han 2019-06-17 18:28:00

Hey. Thanks for checking in. Three big pushes we're making right now: 1. Hiring: You can see our H2 hiring plan here

[REDACTED]. We just hired a Law Enforcement Response Manager, and we're pushing to get two Policy Analysts and a Quality Assurance Manager onboarded ASAP. The full plan is yet to be approved by HR, though has been approved by Vanessa and Yuyi on GCDS. 2. CMS 2.0 (Ops Tool): We're currently in the process for shipping a new Ops tool for our Safety moderators. By the end of this week, we should have all US Safety moderation outside of China (the moderators will be split between US, PH, and MY teams). The tool will help us tag policy violations, which was not possible in the previous tool. 3. Safety Taxonomy: The US Content team is pushing a project to start labeling content with the goal of building out machine learning algorithms to help identify types and sub-types of content (e.g., comedy - meme; sports - basketball). We're pushing to do a similarly sized project with Safety-related domains (though we have not yet identified which domains). 4. Kidtech Solutions - This is something I was about to send out to you and [REDACTED] as well. I was put in touch with a company called SuperAwesome (<https://www.superawesome.com/>) that provides software to help companies comply with regulations on minors. For example, they have a product called KidSwitch that uses AI to guess the age of a user. On the GR-side, is this something that is discussed or asked about? This is a whole lot of text, so I'm happy to jump on a call to discuss as well

Eric Ebenstein 2019-06-17 18:34:00

hey thanks for all of this! definitely happy to talk with you/ [REDACTED] about kidtech solutions. That's something we need to be pretty careful of, specifically around our FTC obligations, their ability to do their job accurately and how/if they use AI around facial recognition. The last point is super touchy in the media and policy realms at the moment.

Eric Ebenstein 2019-06-17 18:34:00

will take a look at all the rest later. you've got your hands full!

Eric Han 2019-06-17 18:38:00

For sure! The kidtech is still very early, though i'd like to understand what our product roadmap is internally (if any) for kids/minors. We have the under 13 version of the app, though, anecdotally, we're still seeing quite a few kids slipping through the cracks (which makes sense, since an age gate is easy to circumvent). They also push a product around progressive permissions (e.g., App is unlocked after a verified parent grants access). Sounds like something we can build internally, though not sure what the appetite is

Eric Ebenstein 2019-06-17 18:39:00

Yoti is another company in the same general space if you're interested. I've spoken with them previously.

Eric Han 2019-06-17 18:39:00

Yeah, it would be good to hear ideas from multiple parties. Throw me their contact if you have one :)

Eric Ebenstein THUMBSUP 2019-06-17 18:40:05

Eric Ebenstein 2019-06-17 19:59:00

Spoke with adl - anti defamation league. They had some interesting questions around whether we group the types of hate speech we see and if we provide any positive outreach to affected parties. They also offered assistance around transparency type reports and generally dealing with the negative. Good guys. If you're interested at some point in them as a reviewer, lemme know.

Eric Ebenstein 2019-07-11 00:30:00

Hi - do you know if we have a working relationship with ncmech and if so what it entails? I'm meeting with them in dc tmrw

Eric Han 2019-07-11 00:32:00

No official relationship from the US side

Eric Ebenstein 2019-07-11 00:32:00

Is there anything we'd like to do/gain from them? Otherwise I'll just listen to what they have to say.

Eric Han 2019-07-11 00:34:00

nothing top of mind. id be curious if they want anything from us?

Eric Ebenstein 2019-07-22 19:08:00

not sure if you or anyone on your team has plans to attend the below conference - ncmec strongly encourages, for what it's worth, and the link here is to their partners, which is all of our competitors. I'm exploring what a potential partnership with them might look like. <http://www.cacconference.org/sponsors>

Eric Ebenstein 2019-07-29 20:52:00

Tmrw can we do 12pt or later?

Eric Han THUMBSUP 2019-07-29 20:53:05

Eric Ebenstein 2019-07-30 16:22:00

apologies, i just got scheduled over - can we do 12:30 or 1pm pt instead?

Eric Han 2019-07-30 17:52:00

Yep, that should work with [REDACTED]. Thanks!

Eric Ebenstein 2019-08-16 14:09:00

Just a heads up: YOUTUBE'S TRACK RECORD — YouTube remains rife with white supremacist and anti-Semitic videos more than two months after the Google-owned platform banned content promoting supremacist views and other bigotry-boosting ideologies, the Anti-Defamation League's Center on Extremism finds in a new report. The group identified still-active anti-Semitic channels with a combined total of more than 330 million subscribers and white supremacist channels with a combined total north of 150 million views. Many of the videos cited in the report were uploaded to YouTube after the ban took effect, some as recently as mid-July. — The bigger picture: Social media companies are under growing international pressure to take down dangerous content more quickly. Germany, for example, has a stringent removal window, requiring platforms to delete "obviously illegal" content within 24 hours or face fines of up to 50 million euros; after the Christchurch, New Zealand, mass shootings in March, which were livestreamed on Facebook and spread across the internet, Australia passed legislation

requiring social media companies to remove violent content "expeditiously" or face fines of up to 10 percent of their annual profit, with possible jail time for company employees. — What's next? Asked what YouTube views as an adequate timeline for removal of content that violates its policies and whether it plans to take action on the channels identified in the ADL report, a Google spokesperson didn't address those questions directly but told MT that it's been just two months since the policy took effect and that enforcement will ramp up over time. The spokesperson said the company has removed thousands of accounts dedicated to hate speech.

Eric Han OK 2019-08-16 17:23:18

Eric Han 2019-08-16 17:23:00

Is this a public report by the ADL?

Eric Ebenstein 2019-08-16 17:26:00

Probably, though I haven't looked. Their center on extremism puts stuff out. Can get someone to try to pull it for you if you need.

Eric Han 2019-08-16 17:27:00

Found it :) <https://www.adl.org/blog/despite-youtube-policy-update-anti-semitic-white-supremacist-channels-remain>

Eric Ebenstein OK 2019-08-16 17:34:46

Eric Ebenstein 2019-08-21 20:43:00

May only be able to join for a few minutes today. 6pm for a call is tough for me most days. But I will circle back afterwards.

Eric Han 2019-08-21 20:43:00

All good! Forgot to check my west coast bias. Will have a more considerate time in the future

Eric Ebenstein 2019-08-21 20:44:00

Ha. I'm the outlier. No worries.

Eric Han HEART 2019-08-21 21:28:30

Eric Ebenstein 2019-08-21 22:16:00

Gotta drop. I'll circle back.

Eric Han 2019-09-03 20:01:00

Hey Eric. Do you have a doc that lists all our current partnerships relating to safety issues? [REDACTED] myself, and [REDACTED] (TikTok4Good) all have similar objectives relating to owning our safety narrative (which includes understanding what partnerships we currently have). Any info you have on our current status will help us organize better and reduce redundancies. Thanks!

Eric Ebenstein 2019-09-03 23:05:00

Hey. I don't but happy to send you some of the ones I'm aware of so we can put one together. Makes a lot of sense.

Eric Han 2019-09-03 23:05:00

Awesome! If you can send me over the org and any POC/contact you might have, that would be helpful. Happy to put together a doc we can use together

Eric Ebenstein OK 2019-09-03 23:06:14

Eric Ebenstein 2019-09-04 08:53:00

NCMEC: [REDACTED], FOSI [REDACTED] Connect Safely, [REDACTED]
[REDACTED] National PTA: [REDACTED] We've yet to pay for any of these, but they've been approved/are in the works so I think they meet the requirements. Eventually, I assume, the OA issues will get worked out. Let me know if you need more/different

Eric Han THUMBSUP 2019-09-04 17:32:50

Eric Ebenstein 2019-09-06 07:38:00

Hi! Who would you like to be the POC on reporting issues to NCMEC? I'd suggest you or someone on your team. Beijing is filling out the form and indicated a preference for an HQ person, but I think someone from the US is advisable. Lemme know.

Eric Han 2019-09-06 20:05:00

Best person is [REDACTED], who will be managing the Law Enforcement Response team. Thanks for reaching out

Eric Ebenstein 2019-09-06 20:07:00

Ok. I'll suggest to hq. You want to talk to him? I can do it also

Eric Han 2019-09-06 20:07:00

I just let him know

Eric Ebenstein 2019-09-19 18:30:00

quick background on [REDACTED] - he's based in palo alto and i had also already connected him to [REDACTED] great minds and all that...he's been through the LA office once before with [REDACTED]. He witnessed some content moderation (something I'm eager to experience as well). Hoping he can connect with both of you at separate times for in-depth understanding of our business so that he can serve as a public advocate for us in the face of all the criticism we've been taking. His organization produces those "how-to" guides, and has made them for all of our competition. Should be a good shield for us going forward.

Eric Han THUMBSUP 2019-09-19 18:36:41

Eric Han 2019-09-19 18:36:00

Good to know! Thanks for the intro :)

Eric Han 2019-09-19 18:37:00

Also, if you're interested in shadowing our team on how content is moderated -- let me know and we can set that up

Eric Ebenstein 2019-09-19 18:38:00

Definitely. Planning to be back in LA next month and hopefully it won't be such a whirlwind. I'll actually reach out to you ahead of time, instead of, you know, nearly running into you in the hallway...

Eric Han BLUSH 2019-09-19 18:38:37

Eric Han 2019-09-19 18:38:00

Hahhaa. sounds good!

Eric Ebenstein 2019-09-28 13:56:00

@Eric Han nra reached out to [REDACTED] on my team via linked in requesting verification.

Eric Ebenstein 2019-09-28 13:56:00

She didn't respond. Are they verified?

Eric Han 2019-09-28 15:13:00

They are not verified

Eric Ebenstein 2019-09-28 15:15:00

It was their social media manager - do we want to reach out via comms or someone else?
I'm worried they're setting us to claim we won't let them be verified.

Eric Han 2019-09-28 15:21:00

One sec. Gonna add you to another Lark thread

Eric Ebenstein 2019-10-01 18:17:00

Hi - can you add [REDACTED] to the recurring xfn meeting that's scheduled tomorrow afternoon? As it stands, that's going to be a regular conflict for me, but I want to make sure we're represented, so I'm hoping she can sub in on the weeks that I cannot. Thanks.

Eric Han THUMBSUP 2019-10-01 18:17:48

Eric Han 2019-10-01 18:17:00

No prob!

Eric Ebenstein THUMBSUP 2019-10-01 18:18:09

DOCUMENT METADATA

Bates Number: TIKTOK3047MDL-060-01081102-TIKTOK3047MDL-060-01081112

BEGATTACH: TIKTOK3047MDL-060-01081102

ENDATTACH: TIKTOK3047MDL-060-01081126

Attachment Count: 1

PRODVOL: TIKTOK3047MDL-060

Custodian: ERIC EBENSTEIN_CON

File Path: /TIKTOK3047MDL-060-01081102.PDF

Confidentiality Designation: CONFIDENTIAL

HASHVALUE:

DocType:

Author:

Create Date:

Last Modified Date:

LAST MODIFIED BY:

TRACK CHANGES:

COMMENTS:

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Email To:

Email CC:

Email BCC:

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Sent Date:

TIMEZONE:

Subject:

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THREADID:

REDACTIONS: N

REDACTION TYPE: