

AMENDED Exhibit 470

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

CLF - Curriculum Integration Program: Partnership Strategies

Author: © [REDACTED]
4/28/20

Updated

Ref: [HYPERLINK [REDACTED]

Context

The School Curriculum Program is a major component of the Creative Learning Fund, and one of our most ambitious strategies to evolve perception of TikTok's utility as a platform. We seek to work with educators to make TikTok a resource for classrooms, both as a host of A13+ learning materials, and to build out the TikTok platform as a place for students and educators to collaborate. The extraordinary circumstances of the COVID-19 pandemic has made the need for digital learning resources more urgent than ever. Knowing teachers face the need to adapt their teaching strategies to distance learning, we seek to make TikTok a tool to engage students, provide valuable material, and support inclusive learning opportunities. As a mobile app already popular with high school and college students, TikTok is uniquely well-positioned to be an urgently needed solution for teachers and students across the income spectrum, in a variety of school contexts.

Curriculum Integration Program Goals:

- ✦ Make TikTok a meaningful tool for classroom educators during distance learning and beyond
- ✦ Create opportunities for teachers to build curricular content on TikTok at scale
- ✦ Inform the development of tools and features that make TikTok an essential platform for educators and learners

How: TikTok seeks to select a partner to help us build a program to deliver on these goals.

Potential Partner Options

[HYPERLINK "https://www.next10ventures.com/" \ "about" \h] -

What: Venture fund and consultative services business run by former YouTube Global Creator Partnerships leader. Experienced and connected among creator communities, and focused on the educational space.

Proposed Curricular Strategy: Next10 has proposed to run a grant program on behalf of TikTok that would identify and incentivize individual classroom teachers to make TikTok videos. To accomplish this, they would engage top-performing educational creators currently on TikTok (names TBA) and "hand-selected education industry professionals" to form a committee to both inspire and select teacher grant recipients. This committee members would receive a program management fee. They also propose we engage a portfolio company of theirs, Influence.co to build a platform for conversation and connection between teachers in the program.

Reason to Believe: We want to avoid schools and their bureaucracy by incenting teachers directly, and bring teachers into the creator world.

[HYPERLINK "<https://www.genyouthnow.org/about-us>" \l "whoweare" \h] -

What: An education non-profit focused on nurturing healthy, high-achieving youth responsible for Fuel Up to Play 60 - the largest in-school nutrition and physical activity program in the nation (73,000 schools/38M students) in partnership with the NFL and the National Dairy Council, and other programs. Founded under an MOU with the US Depts of Agriculture, Education, and Health and Human Services, GENYOUth is politically connected and experienced in working with corporate partners on programs that meet the needs of students and educators.

Proposed Curricular Strategy: GENYOUth proposes to build a program that positions TikTok as a solution to two exigent teacher/school needs: 1) bridging the digital and broadband divide in underresourced schools, neighborhoods and regions; and 2) providing tools that authentically engage students during uncertain and prolonged periods of distance learning. Through their networks, they would build advisory groups of influential school administrators, teachers and students. In Phase 1, those councils would inform both program and product feature design such that TikTok builds learning resources and platform features that are safe, useful, and bought-in at the school administrative level. In Phase 2, we would roll out pilots at 5-10 school districts, selected to reflect a diverse set of school profiles and based on relationships GENYOUth has with politically powerful superintendents who would welcome TikTok as a solution. During the pilots, teachers and schools would receive training and grants to support their adoption of TikTok Learning tools. Learnings from the pilot phase would inform how we would roll out the tools to further districts, and GENYOUth's network, marketing and PR efforts would support.

Reason to Believe: We want real impact at scale, lasting relationships with influential educational leaders, and credit for creating solutions for educators in crisis.

[HYPERLINK "https://everfi.com/" \h] -

What: A technology services company that provides digital curriculum and tech platforms to K-12 schools, often focused on financial literacy and soft skills. EVERFI products can be white labeled by corporate sponsors such that they are free to schools and provide students with proven curriculum on key topics, tied to positive student outcomes like health and wellness.

Proposed Curricular Strategy: EVERFI proposes to design and host a platform for teachers to engage students in TikTok challenges that relate to learning topics. Teachers (engaged through EVERFI's email network) would sign up to be part of the program, which would include digital safety learning modules for students, and host weekly TikTok challenges that can be won by students who submit the best TikTok videos.

Reason to Believe: Smaller is better and we want a turnkey, low-profile translation of TikTok into the classroom learning context.

Comparing Partner Strategy Options

	Next10	GENYOUth	EVERFI
<u>Pros</u> :	-Knows educational Creator ecosystem -Straightforward, simple model to engage teachers -As a business/consultative engagement, would present lowest burden on TT staff to execute	-Schools program design and management expertise -Gets us to scale through influential education leaders in addition to teacher adoption -Connects the most important end users (teachers and learners) to our Learning features	-Turnkey solution -Established edTech provider -Video curriculum development expertise (longer form) -Could be accomplished for much less money than we have earmarked (Pro and Con!)

		development -Politically connected CEO and Board -Innovative, highlights what sets us apart from YouTube	
<u>Risks:</u>	-Lack of experience/influence with classroom educators -Unclear theory of execution - does Nick Uhas have influence with classroom educators? Is grant money enough to turn teachers into TikTok creators?	-Is the most ambitious path to make TikTok a platform for learning -Likely greatest PR risk of the three, mitigated by GY relationships -Non-profit partner could move at a slower pace than we are accustomed	-Unlikely scale or big impact -Likely does not go toward shifting perception of TikTok as place for only hashtag challenges/fun -No innovation "points" -Minimal opportunity for teachers to create curricular content on TikTok
<u>Notes:</u>	Next10 has only provided a high-level, paragraph form proposal so far	GENYOUth has laid out a research and scoping phase budget of \$1.695M	Phase 1 (6 month pilot) budgeted at \$450K. Scaled rollout through marketing to teacher network (73K teachers) at 7 figures

References:

[HYPERLINK [REDACTED]

Next10 Docs:

[HYPERLINK [REDACTED]

[HYPERLINK [REDACTED]

GENYOUth Docs:

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EverFi Docs:

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DOCUMENT METADATA

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