

AMENDED Exhibit 475

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

[PR] Teacher Appreciation Week (May 3-7)

Overview

What's happening?

During Teacher Appreciation Week, we are highlighting 10 standout teachers on TikTok and awarding them with \$5K to spend on their classrooms/students.

Goals

- * Demonstrate TikTok's support for teachers on the platform
- * Showcase how teachers use TikTok to express themselves and find community in creative and meaningful ways
- * Raise awareness of our support for teachers among policymakers and NGO/civil society audiences
- * Secure coverage in tech/policy, family/parenting, and consumer outlets

Markets affected

US

Announcement timing

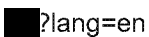
Monday, May 3 at 10am ET

Top 10 Teachers

[HYPERLINK

[HYPERLINK

Name	Handle	Profile	Category	Fo llo we rs	City	State	School	N ot es

		?lang=en	11th grade	M	go		Academ y 2277 Rosecra ns St, San Diego, CA 92106
		?lang=en	Chemistry & Environmenta l Chemistry; 9th through 12th grade	3. 2 M	Cul ver	Indian a	Culver Academi es 1300 Academ y Rd, Culver, IN 46511
		?lang=en	Science teacher; Kindergarten through 5th grade	2. 3 M	Cha rlott e	North Caroli na	Huntingt owne Farms Element ary School2 520 Huntingt owne Farms Ln, Charlott e, NC 28210
		?lang=en	All subjects; 1st and 2nd grade	10 5. 3K	Oza uke e	Wisco nsin	Wiscons in Virtual Learning
			All subjects; 4th and 5th	90 .2	Irvin g	Califor nia	Orchard Hills

Donot mention school

		[REDACTED]?lang=en	grade	K			School 11555 Culver Dr, Irvine, CA 92602	
		https://www.tiktok.com/[REDACTED]	All subjects; Kindergarten	35 1. K	Dallas	Texas	Uplift White Rock Hills Preparatory 7370 Valleyglenn Dr, Dallas, TX 75228	
		https://www.tiktok.com/@[REDACTED]?lang=en	Spanish teacher; Kindergarten through 6th grade	2. 5 M	Louisville	Kentucky	Walden School 4238 Westport Road • Louisville, KY 40207	
		https://www.tiktok.com/@[REDACTED]	All subjects; Kindergarten	90 .8 K	Redmond	Washington	Ella Baker Elementary 9595 Eastridge Dr NE, Redmond, WA 98053	
		https://www.tiktok.com/[REDACTED]?is_copy_url=1&is_from_webapp=v1	ESL	1. 6 M	Malvern	Arkansas	N/A	Do not mention

  (unman aged/Bl ack Creativ es)	https://www.tiktok.com/?lang=en Math; 6th grade	h o o l o r c i t y
	1. Ric 3 hm M ond	Polly Ryon Middle School 7901 FM 762 Rd, Richmo nd, TX 77469
	Texas	

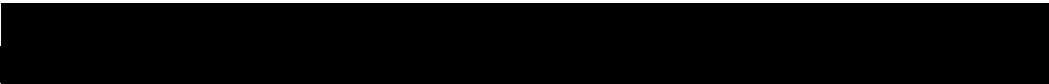
Blog post [DRAFT]

Approvals needed:

✓@  2021-04-30 02:00

✓@  2021-04-30 02:00

Newsroom link: <https://newsroom.tiktok.com/en-us/ten-standout-teachers-on-tiktok>

Thumbnail: 

Ten standout teachers on TikTok

Today kicks off National Teacher Appreciation Week, and there's no better time to honor and celebrate educators across America. From teaching remotely to managing the logistics of hybrid learning, the pandemic has brought no shortage of challenges to teachers. Along the way, more teachers have turned to TikTok to share laughs, inspire other educators and parents, and showcase their creativity, like [HYPERLINK

"[https://www.tiktok.com/\[REDACTED\]/video/6941569610378513670](https://www.tiktok.com/[REDACTED]/video/6941569610378513670)" \h], [HYPERLINK

"[https://www.tiktok.com/\[REDACTED\]/video/6927317811735891206?is_copy_url=1&is_from_webapp=v1](https://www.tiktok.com/[REDACTED]/video/6927317811735891206?is_copy_url=1&is_from_webapp=v1)" \h], and [HYPERLINK

"[https://www.tiktok.com/\[REDACTED\]/video/6938212709712350470?lang=en&is_copy_url=1&is_from_webapp=v1](https://www.tiktok.com/[REDACTED]/video/6938212709712350470?lang=en&is_copy_url=1&is_from_webapp=v1)" \h].

This Teacher Appreciation Week, we're thrilled to spotlight 10 standout teachers from the TikTok community. Through their creativity and passion for teaching, these educators remind us just how fun learning can be. To show our appreciation for these often unsung heroes, we're awarding each standout teacher \$5,000 to use towards their virtual or in-person classrooms and students. And we're encouraging all teachers to share their stories with the TikTok community this week using [HYPERLINK "https://www.tiktok.com/tag/teachersontiktok?lang=en" \h].

"Teachers play an incredibly important but often undervalued role in our society. They are constantly innovating and adapting, using their own personal resources to enable students to feel seen and heard. We are thrilled to show a small gesture of appreciation towards these educational creators who use TikTok to connect with their students and families in a creative way so that learning continues to be fun no matter the circumstances." - [REDACTED]

[REDACTED] Manager, Creator Management and Operations, TikTok

Trying new and creative ideas is part of what makes TikTok a fun and supportive place to learn and grow. Whether it's teachers, experts, or enthusiasts empowering people to [HYPERLINK "https://newsroom.tiktok.com/en-us/investing-to-help-our-community-learn-on-tiktok" \h] or [HYPERLINK "https://newsroom.tiktok.com/en-us/partnering-with-national-pta-to-support-students-and-educators-in-our-community" \h] to accelerate distance learning and school meals, TikTok is invested in supporting teens, families, and educators across the country.

Let's meet our 10 standout teachers on TikTok:

* [HYPERLINK

"https://www.tiktok.com/[REDACTED]?is_copy_url=1&is_from_webapp=v1" \h] -

[REDACTED] a middle school English teacher, started posting grammar lessons on TikTok as a way to reach her virtual students who weren't watching her videos on YouTube. Just a few months later, [REDACTED] had over 1.6M followers from 82 different countries. Her followers include ESL learners who mastered basic grammar skills needed for language acquisition, some who needed academic refreshers, and others who use her content to study for various tests. From sharing the [HYPERLINK

"https://www.tiktok.com/[REDACTED]/video/6945198338396523782?is_copy_url=1&is_from_webapp=v1" \h] to [HYPERLINK

"https://www.tiktok.com/[REDACTED]/video/6951176358814878982?is_copy_url=1&is_from_webapp=v1" \h], [REDACTED] videos and stories motivate and inspire other teachers. In return, [REDACTED] says TikTok also helps her feel like what she does matters to so many people. TikTok has allowed her classroom to expand around the world, while helping other educators remember how much they are needed in this profession.

* [HYPERLINK "https://www.tiktok.com/[REDACTED]?lang=en" \h] - [REDACTED] is a 6th grade teacher in Richmond, Texas who initially joined TikTok to make silly videos with her students. Once the pandemic hit, she wanted to find another way to engage with her math students beyond their regular Zoom classes. That's when she started creating mini math lessons on TikTok, such as [HYPERLINK "https://www.tiktok.com/[REDACTED]/video/6933654330776046854?lang=en&is_copy_url=1&is_from_webapp=v1" \h] and [HYPERLINK "https://www.tiktok.com/[REDACTED]/video/6943253849398398214?lang=en&is_copy_url=1&is_from_webapp=v1" \h]. [REDACTED] credits using the music her students love mixed with education that helps them be more engaged with her TikTok lessons.

* [HYPERLINK "https://www.tiktok.com/[REDACTED]?lang=en" \h] - [REDACTED] is a 1st and 2nd grade teacher in Wisconsin who uses TikTok to share tips and advice for other teachers and parents, specifically around the Science of Reading curriculum. She joined TikTok after her daughter told her about the thriving teacher community on the platform. Since then, her videos about [HYPERLINK "https://www.tiktok.com/[REDACTED]/video/6932274705072164102?is_copy_url=1&is_from_webapp=v1" \h] and [HYPERLINK "https://www.tiktok.com/[REDACTED]/video/6930345673221082373?lang=en&is_copy_url=1&is_from_webapp=v1" \h] have gone viral. [REDACTED] says TikTok has been more than she ever imagined it would be. She gets messages from parents and teachers who tell her the tips she shares are changing their lives and the lives of their students and children. [REDACTED] says TikTok has allowed her to spread knowledge so much farther than she ever thought she could.

* [HYPERLINK "https://www.tiktok.com/[REDACTED]?lang=en" \h] - [REDACTED] is a middle school and high school teacher in San Diego, California. He first joined TikTok to connect with his students when his school closed due to COVID-19. As a self-described energetic and silly person, teaching in the classroom is where he thrived in developing deep relationships with students. Because the virtual classroom wasn't enough, [REDACTED] decided to step into the world of his students and join TikTok to create a fun space where he could be himself. His videos, such as one that lists [HYPERLINK "https://www.tiktok.com/[REDACTED]/video/6955563206316248326?lang=en&is_copy_url=1&is_from_webapp=v1" \h], allow [REDACTED] to share many laughs with his students.

* [HYPERLINK "https://www.tiktok.com/[REDACTED]" \h] - [REDACTED] is a Kindergarten teacher in Redmond, Washington who has been teaching from his kitchen during the last year. His partner felt so inspired whenever he'd listen to [REDACTED] teach his class, so he started filming and posting on TikTok. The videos of [REDACTED] on a [HYPERLINK "https://www.tiktok.com/[REDACTED]/video/6954988899873705222?is_copy_url=1&is_from_webapp=v1" \h] and a [HYPERLINK "https://www.tiktok.com/[REDACTED]/video/6884334068834635013" \h] have touched a lot of

hearts on the platform and show just how fun and engaging online teaching and learning can be. [REDACTED] says TikTok challenged him to be innovative, try new things, and get out of his comfort zone. As a result, he's been able to create a positive light for all teachers and parents who watch his videos.

* [HYPERLINK "https://www.tiktok.com/[REDACTED]?lang=en" \h] - [REDACTED] is a fourth generation North Carolina public school educator who teaches science to students in Kindergarten through 5th grade. She joined TikTok in March 2020 just after schools were shut down when she noticed students were spending hours a day on social media but not attending her virtual class. That's when [REDACTED] started posting fun science experiment videos as a way to creatively engage her students during virtual learning, which soon took off on TikTok. Her video demonstrating how [HYPERLINK "https://www.tiktok.com/[REDACTED]/video/6929193095074499845?lang=en&is_copy_url=1&is_from_webapp=v1" \h] went viral with 12.2M views. [REDACTED] says her students always talk about how they tried one of her TikTok experiments at home with their parents, which makes her proud.

* [HYPERLINK "https://www.tiktok.com/[REDACTED]?lang=en" \h] - [REDACTED] is a veteran 4th and 5th grade teacher in Irvine, California. She first joined TikTok just to watch videos. In fact, her students made her promise not to make any dance videos. Nancy created videos of [HYPERLINK "https://www.tiktok.com/[REDACTED]/video/6927157512009501957" \h] that took off on TikTok and became a competition among classrooms at her school. Last year, she was invited to join TikTok's [HYPERLINK "https://newsroom.tiktok.com/en-us/introducing-the-200-million-tiktok-creator-fund" \h] to continue contributing to the teacher community through the [HYPERLINK "https://newsroom.tiktok.com/en-us/investing-to-help-our-community-learn-on-tiktok" \h] platform.

* [HYPERLINK "https://www.tiktok.com/[REDACTED]?lang=en" \h] - [REDACTED] teaches Spanish to Kindergarteners through 6th graders in Louisville, Kentucky, but his TikTok videos are reaching millions of people across the world who want to learn Spanish. He joined TikTok as a way to explore new opportunities during the pandemic and reach people who wanted to learn a new language. He creates fun and silly videos that show how to use Spanish in everyday situations, such as how to say [HYPERLINK "https://www.tiktok.com/[REDACTED]/video/6955187145208253702?lang=en&is_copy_url=1&is_from_webapp=v1" \h] and [HYPERLINK "https://www.tiktok.com/[REDACTED]/video/6954517733165878534?lang=en&is_copy_url=1&is_from_webapp=v1" \h].

* [HYPERLINK "https://www.tiktok.com/[REDACTED]?lang=en" \h] - [REDACTED] is a popular science educator on TikTok who teaches high schoolers in Culver, Indiana. He first joined

TikTok after a student encouraged him to make a video of a [HYPERLINK

"https://www.tiktok.com/[REDACTED]/video/6730982557275442437?lang=en&is_copy_url=1&is_from_webapp=v1" \h] they did in class. Over the next couple of days, the video gained 15K views while [REDACTED] gained over 5K followers. He continued making popular TikTok videos of what he was teaching in class, such as [HYPERLINK

"https://www.tiktok.com/[REDACTED]/video/6920772056325950726?is_copy_url=1&is_from_webapp=v1" \h] and [HYPERLINK

"https://www.tiktok.com/[REDACTED]/video/6869171735816654086" \h]. [REDACTED] TikTok videos have encouraged a love and curiosity of science across the TikTok community.

* [HYPERLINK "https://www.tiktok.com/[REDACTED]" \h] - [REDACTED] is a Kindergarten teacher in Dallas who joined TikTok while feeling bored during quarantine. She started posting on TikTok because she missed her students and wanted to share her classroom memories. [REDACTED] students love music, so she began incorporating popular songs and dances from TikTok into her lessons. Her heartwarming videos range from [HYPERLINK

"https://www.tiktok.com/[REDACTED]/video/6922240195362409733?is_copy_url=1&is_from_webapp=v1" \h] to [HYPERLINK

"https://www.tiktok.com/[REDACTED]/video/6872412452877782277?is_copy_url=1&is_from_webapp=v1" \h].

Communication strategy

What are we trying to accomplish: Secure coverage in tech/policy, family/parenting, consumer, regional, and local outlets. Raise awareness of our support for teachers among policymakers and NGO/civil society audiences

In advance

* Pre-record interview with one of the creators and the National PTA [HYPERLINK

[REDACTED]

* Secure exclusive with national broadcast or print outlet that reaches parents

Day-of

* Pitch blog post to family/parenting, consumer, regional, and local outlets

Longer term

* Include mention in our Hill, civil society, and Families on TikTok newsletters

Media targets

[HYPERLINK [REDACTED]

Key messages

- * During a time where educators have been forced to teach behind webcams and laptops, creativity is key.
- * TT has thrived as a place for teachers to experiment with creative new ways to engage their audiences, share and learn from other teachers who are making an impact from home, and help all of us appreciate just how fun learning can truly be.
- * In honor of National Teacher Appreciation Week, we're highlighting standout educational creators who have kept learning fun by turning TikTok into their classroom.

Press pitch

[HYPERLINK [REDACTED]

FAQ

Q. How were the 10 standout teachers chosen?

A. Our standout teachers on TikTok were nominated by the TikTok community, including creators and staff, based on the frequency and relevancy of their content, and creative use of the platform. The 10 standout teachers range in the subjects and grades they teach, with grades ranging from kindergarten to high school and subjects including English, math, reading, science, and more.

Q. Why is TikTok recognizing Teacher Appreciation Week?

A. Teachers play an incredibly important but often undervalued role in our society. They are constantly innovating and adapting, using their own personal resources to enable students to feel seen and heard. We are thrilled to show a small gesture of appreciation towards these educational creators who use TikTok to connect with their students and families in a creative way so that learning continues to be fun no matter the circumstances.

Rollout checklist

- ☒ List of top 10 teachers
- ☒ Key messages [REDACTED]
- ☒ Communication strategy [REDACTED]
- ☒ Blog post
 - ☒ Draft ready for comms review
 - ☒ Draft ready for exec review
 - ☒ Approvals needed: <those who must approve, vs. those who should review + contribute>
 - ☒ Final approved and locked
 - ☒ Create predictive link for embargoed pitching
 - ☒ Upload to Newsroom
- ☐ Media handling processes [REDACTED]
 - ☒ Align on pre-brief media strategy / reporters
 - ☒ Build full media lists
 - ☒ Press pitch to reporters
- ☐ Comms enablement & coordination [REDACTED]
 - ☐ Internal comms for employees [REDACTED]
 - ☐ Coverage tracking report & analysis
 - ☐ [HYPERLINK [REDACTED]
 - ☐ If applicable: Newsroom social media strategy & comms
- ☐ Cross-functional coordination
 - ☒ Add to [HYPERLINK [REDACTED] and/or local market calendar
 - ☒ Design assets: blog post, screenshots, gifs, etc [REDACTED]
 - ☒ Thumbnail image
 - ☐ Social media strategy & timeline [REDACTED]
 - ☐ Messaging for partner-facing teams [REDACTED]

Planning & notes