

AMENDED Exhibit 477

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

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT) MDL No.
ADDICTION/PERSONAL INJURY) 4:22-md-3047-YGR
PRODUCTS LIABILITY LITIGATION)
_____)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
UNLIMITED JURISDICTION

COORDINATION PROCEEDING)
SPECIAL TITLE [RULE 3.550]) JCCP No. 5255
)
SOCIAL MEDIA CASES) Judge: Carolyn B. Kuhl
_____) Dept. 12
)
This Document Relates to:)
)
ALL ACTIONS)
_____)

Thursday, February 27, 2025

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Video-Recorded Oral Deposition of
SANDEEP GROVER, held at the offices of King &
Spalding LLP, 245 Lytton Avenue, Suite 150,
Palo Alto, California, commencing at 10:05 a.m.
PST on the above date, before Michael E. Miller,
Fellow of the Academy of Professional Reporters,
Certified Court Reporter, Registered Diplomate
Reporter, Certified Realtime Reporter and
California CSR #13649.

GOLKOW TECHNOLOGIES, A VERITEXT DIVISION
877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

1 bit about your career before TikTok and then
2 your job at TikTok, okay?

3 A. Yeah.

4 Q. So I'm going to hand you Tab B
5 and mark that as Exhibit 2. And for the
6 record, this is a going to be a download of
7 your LinkedIn profile.

8 A. Okay.

9 (Whereupon, TikTok-Grover-2,
10 LinkedIn Profile, was marked for
11 identification.)

12 BY MS. CRAICK:

13 Q. Here's a copy for you.

14 A. Thank you.

15 Q. You can take a look at that.

16 There -- I don't know if you've ever
17 downloaded a PDF from LinkedIn before, but it
18 puts it in this kind of résumé format, but if
19 you could take a look and see if this looks
20 like the same information that's on your
21 LinkedIn profile?

22 A. I think this looks like -- yep,
23 agreed, this is what I wrote.

24 Q. Okay. And you wrote your
25 LinkedIn profile, correct?

1 A. That's right.

2 Q. Okay. And it's accurate?

3 A. This is dated, like, I don't
4 think I updated in a while, because it's
5 saying like part of Product Leadership at
6 YouTube Ads since 2017, but I'm no longer at
7 YouTube. So likely this has been -- I made
8 it available. I have not updated it, but I
9 don't just...

10 Q. And when you wrote it, it was
11 accurate at the time you wrote it, correct?

12 A. That's right.

13 Q. So under your name, you see it
14 says you're trust and safety leadership at
15 TikTok, at the top?

16 A. Yes, that's right.

17 Q. Okay. And you also worked at a
18 number of companies prior to joining TikTok,
19 correct?

20 A. That is correct.

21 Q. For example, you worked at
22 Amazon, right?

23 A. I did work at Amazon.

24 Q. And YouTube?

25 A. Correct.

1 Q. Okay. And in July 2017 was
2 when you started working at Google or
3 YouTube; is that right?

4 A. That's correct.

5 Q. Okay. And at the time, did
6 Google already own YouTube?

7 A. Sorry, come again?

8 Q. At the time, did Google already
9 own YouTube?

10 A. Yes.

11 Q. And it says that you worked in
12 product leadership at YouTube Ads; is that
13 right?

14 A. That's correct.

15 Q. One of the things -- strike
16 that.

17 What is YouTube Ads?

18 A. I think in Google, the way the
19 company is organized is there's a YouTube
20 organization, a business unit that reports
21 into the CEO of the company, which is Sundar,
22 and then we had an ads organization where we
23 have YouTube Ads, Google search ads or other
24 ad teams, and they were reporting to the ads
25 teams, which were also then eventually

1 reporting to the CEO.

2 So YouTube Ads is a team by
3 itself. This is a team of engineers, product
4 managers, designers, data scientists whose
5 job is to monetize YouTube.

6 Q. Okay. And so YouTube Ads also
7 refers to the advertisements that a user
8 would see when they are watching a YouTube
9 video, for example?

10 A. That is right.

11 Q. Okay. And you said that it's a
12 team of engineers, product engineers,
13 designers and data scientists whose job it is
14 to monetize YouTube; is that right?

15 A. That is correct.

16 Q. Okay. And that included you.
17 You were one of those --

18 A. Product managers.

19 Q. Product managers.

20 A. Product leaders, yeah.

21 Q. Okay. One of the things it
22 says here on your LinkedIn profile relating
23 to Google is kids monetization.

24 Do you see that?

25 A. That sounds right. I'm just

1 trying to see. Where are you seeing this?

2 Q. I believe you have a screen
3 here --

4 A. Yeah, I see it.

5 Q. -- where the trial tech is also
6 highlighting it, so that might be --

7 A. I see it, yes, that's right.

8 Q. And what does that refer to?

9 A. This would be monetizing the
10 Kids app and monetizing the -- I think
11 primarily monetizing the Kids app would be --
12 yeah, monetizing the Kids app. YouTube has
13 the YouTube main app and the Kids app, so the
14 monetization of Kids app is what this refers
15 to.

16 Q. Okay. And that relates to the
17 advertisements that are shown on the YouTube
18 Kids app?

19 A. That would be right.

20 Q. Is there other ways that you
21 monetized either the Kids app or main
22 YouTube?

23 A. I don't remember how things may
24 have changed, but there used to be
25 subscriptions on YouTube that were not

1 managed in the ads teams, that were managed
2 by the YouTube organization. I don't know
3 what else there could be, but subscriptions
4 and advertisements were the two main ways to
5 monetize the app.

6 Q. Okay. And what was the target
7 demographic for YouTube Kids?

8 A. YouTube Kids app was mostly --
9 I think it was under ten. This is, again,
10 very dated. So this would be for younger
11 kids.

12 Q. Okay. Another thing you have
13 listed here at the end is contextual
14 targeting.

15 A. Correct.

16 Q. Do you see that?

17 A. Correct.

18 Q. Could you explain to the jury
19 what that is?

20 A. Right.

21 I think in the Internet
22 industry, there are two ways to target and
23 show ads. One would be based on the audience
24 profile, like we know this person loves
25 cooking and we would want to show them a

1 cooking ad. The other one would be
2 contextual advertising, which is I want to be
3 in front of sports content. So I don't care
4 who's watching, but I want to be in front of
5 sports content, Super Bowl is happening, and
6 I would love to show my ad next to the
7 Super Bowl content. That's contextual
8 advertising, irrespective of who is watching.

9 So this just refers to the fact
10 that I was involved in some work on
11 contextual advertising, giving advertisers a
12 way to target a pack of content that they
13 would be entrusted in.

14 Q. Okay. And is it fair to say
15 that YouTube's business model was an
16 ads-based business model?

17 A. Can you come again? Sorry.

18 Q. Sure.

19 Is it fair to say that
20 YouTube's business model was ads-based;
21 that's how they made most of their money?

22 A. I don't know most, but
23 directionally would sound good. But yes,
24 advertising -- advertisement would be a very
25 reasonable portion of the revenue.

1 Q. Okay. And is it your
2 understanding that TikTok is also an
3 ads-based business model where a significant
4 portion of their revenue comes from
5 advertisements?

6 MR. DRAKE: Object to form,
7 lacks foundation and vague.

8 A. I don't know the split of
9 revenues but ads would definitely be one of
10 the ways to monetize the TikTok app.

11 BY MS. CRAICK:

12 Q. Okay. In April 2022 you went
13 to TikTok, right?

14 A. That's right.

15 Q. And you became the global head
16 of product at trust and safety; is that
17 correct?

18 A. That is right.

19 Q. And then you were in that role
20 until October 2023, it looks like; is that
21 right?

22 A. That's right.

23 Q. And briefly, what were your
24 responsibilities as global head of product in
25 trust and safety?

1 A. I think let me start with the
2 trust and safety organization first, and then
3 I can tell you what my role was as the head
4 of product.

5 So trust and safety's mission
6 is to make the platform the most trusted
7 platform for our users and creators, and what
8 that means is we start with a set of
9 community guidelines which a team would
10 write, and so which would say what is allowed
11 on the platform and what is not allowed on
12 the platform.

13 And we would think of some
14 obvious things we would not allow on the
15 platform, like pornography or child sexual
16 material or hate speech, but it could go very
17 broad. It could be very specific on what's
18 not allowed, even things like dangerous
19 driving would not be allowed because it could
20 result in harm to the user.

21 So the goal of the policies is
22 to find the fine line between preventing harm
23 and enabling expression. That's the goal.
24 And these are the experts who come from
25 academia or nonprofits and they work with the

1 external advisors to find the right line on
2 what is okay or not okay.

3 Once you have the policies
4 written, then we need to enforce the policies
5 on content. So every day, we would have
6 hundreds of millions of pieces of content
7 that are being published on TikTok. The goal
8 of trust and safety is to make sure that
9 every content that is not abiding by the
10 policies, the community guidelines, should be
11 removed.

12 And so the product management
13 team, which is my team -- so my team was a
14 mix of product management and data
15 scientists, and the goal is to come up with
16 strategies and a roadmap to make sure that we
17 can do a very good job in enforcing the
18 guidelines, which means a content that's
19 violating our policies should be removed at
20 the earliest available opportunity and while
21 preserving the ones that don't.

22 The reason it's very hard is
23 because a lot of content we see in this
24 world, it's very much on the line, on the
25 boundary of is it good or bad. It's like

1 pornography is very easy. Like we would not
2 make a mistake on that because it's very easy
3 to find. Things -- you know, is it sexually
4 suggestive or is it, you know, some
5 genuine -- somebody -- some great French
6 dancing? It's very hard to know the intent
7 of the user, particularly in short-form
8 video.

9 So the team's target is to make
10 sure we continue to build a platform as a
11 trusted one for our users and creators, and
12 so the product management team would own the
13 metrics, they would own the strategies to
14 make sure we continue to build the platform
15 as a trusted one for our users.

16 Q. Okay. And did your role also
17 include evaluating not just content on the
18 platform but features of TikTok and assessing
19 risks of those features?

20 MR. DRAKE: Objection, vague.

21 A. Not my role particularly. I
22 was not involved in that. There could be
23 some teams whose job could be to evaluate as
24 the features are launching. They could be
25 evaluating is this feature -- does it pose

1 risk to, you know, certain demographics or
2 like how do we make sure we launch a feature
3 in a way that is safe for the users.

4 BY MS. CRAICK:

5 Q. And what team would be
6 responsible for assessing those risks?

7 A. As of now or -- I mean, they
8 may have changed a little bit.

9 Q. Sure.

10 At any time between when you
11 started at TikTok in April 2020 and the
12 present?

13 A. I think there are multiple
14 teams that do that, right? So, for example,
15 you know, my teams are -- they are organized
16 by line of business, so there could be a new
17 feature is launching on video or there could
18 be a feature launching on push notifications
19 or there could be a feature launching from
20 the product on different things, and there
21 are different teams sitting in different
22 places who could be asked to review, like
23 this is a new feature coming up, what do we
24 need to do to make sure that it continues to
25 meet the bar where we continue to make it --

1 find the balance of, you know -- just to make
2 sure that this is -- continues to meet the
3 bar for the company.

4 So the team would evaluate and
5 provide recommendations, if needed, to the
6 other team to suggest that this could be
7 changed or it's good to go as it is.

8 Q. Is one of the responsibilities
9 of the trust and safety organization at
10 TikTok to evaluate potential risks that might
11 be posed by features that TikTok is
12 considering launching?

13 MR. DRAKE: Object to form.

14 A. I do not know how to answer
15 that one. Like maybe you can come again on
16 this?

17 BY MS. CRAICK:

18 Q. Sure.

19 Is one of the responsibilities
20 for the trust and safety organization at
21 TikTok -- is one of their jobs to evaluate
22 the risk that a certain feature might pose to
23 users on TikTok?

24 MR. DRAKE: Object to form.

25 A. I think my -- where I sit, and

1 I have a very large team, so the -- if I look
2 at my broader teams' objectives and results,
3 I think, go after -- I think it's almost
4 always about content moderation. Like, we
5 want to make sure that the content we are
6 presenting in front of our users are abiding
7 by the guidelines.

8 And at the same time, we want
9 to make sure we're not making mistakes for
10 the creators who are uploading content.
11 Otherwise, it would be too easy to, you know,
12 sell trust and safety.

13 So there's a fine line that we
14 draw, and that is predominantly the majority
15 of the work that we do.

16 If I look at my goals, they're
17 all about content moderation and the work we
18 do. So, you know, could there be a small
19 team that could be reviewing some feature
20 launches? There could be. But that's not at
21 where I sit. I don't speak to those goals.

22 Q. Okay. That wasn't one of the
23 priorities of your work specifically; is that
24 right?

25 A. I would say they were not at

1 all my priorities.

2 Q. Okay. You became, at some
3 point, the head of core experience at TikTok;
4 is that right?

5 A. That is correct.

6 Q. Okay. And when was that?

7 A. October of 2023.

8 Q. Okay. And what is the core
9 experience team?

10 A. Yeah, I think this is -- I
11 talked about the policy team, so this team
12 is -- has everything that you need to delight
13 our users and creators.

14 So there's a policy team that
15 writes the policies. There's a product team
16 and data science team. And then there's also
17 a team of operations, which is -- I think the
18 way it works is when a piece of content is
19 uploaded on TikTok, the first thing we do is
20 ask the machine learning and technology:
21 What do you think of this video?

22 And the technology might say
23 this is good to go. This is a very easy, you
24 know, cat dance happening. And so the
25 machine would say good to go, and the video

1 is approved, it's ready for recommendations.

2 And there's also a very
3 obvious -- this is a bad video, let's remove
4 it. So the machine would take it of those
5 two scenarios for the overwhelming majority.
6 For a small percentage of content, the
7 machine is not sure. The machine thinks I
8 would value a second opinion, and then they
9 would give that video to a human review, a
10 team of operations.

11 So that's what we call
12 operations. And then the human would decide
13 what to do with the video, and they might
14 decide to approve it or reject it based on
15 the guidelines that they have been taught.

16 So policy, product, data
17 science and operations, this -- all of these
18 teams are reporting in to me now, and we call
19 this core experience.

20 Q. Okay. And was that a promotion
21 for you or was it a lateral move?

22 A. This would be a promotion.

23 Q. Okay. Congratulations.

24 A. Thank you.

25 MS. CRAICK: All right. Let's

1 pull up a document. I'm going to pull
2 up Tab D and mark that as Exhibit 3.

3 (Whereupon, TikTok-Grover-3,
4 TikTok 2023 Q2 OKRs (Full),
5 TIKTOK3047MDL-120-LARK-06126223 -
6 TIKTOK3047MDL-120-LARK-06126228, was
7 marked for identification.)

8 BY MS. CRAICK:

9 Q. For the record, this Bates
10 number starts with
11 TIKTOK3047MDL-120-LARK-06126223, and the
12 title of this document is TikTok 2023 Q2 OKRs
13 Full.

14 Do you see that, Mr. Grover?

15 A. I do.

16 Q. And OKRs are objectives and key
17 results, right?

18 A. Correct.

19 Q. And if you look on page 4 of
20 the document, you will see your name assigned
21 to some of these things at the top.

22 A. Yes, I see them.

23 Q. Okay. So one item was to align
24 with trust and safety on key metrics and
25 goals, especially for the US.

1 Do you see that?

2 A. Sorry, which one? Page?

3 Q. It's on page 4.

4 A. The one on the top: Improve
5 content safety and product safety?

6 Q. Yeah. You see your name next
7 to improve content quality and product
8 safety, right?

9 A. Yes, I do.

10 Q. And then the second bullet
11 point down under (b), you see: Indicators
12 align with trust and safety on key metrics
13 and goal, especially for US.

14 And you see @SandeepGrover
15 there too, right?

16 A. That is correct.

17 Q. And when you have a tag like
18 this, where it's @, your name, is that
19 something you would be notified of?

20 A. Is this a Lark doc or is
21 this -- this is a -- is this a document?

22 Q. My understanding, this is a
23 Lark document.

24 A. Yeah, if there's a document,
25 then I should be notified.

1 Q. Okay. Another part of this
2 list in the first bullet point is reduce
3 overkills.

4 Do you see that?

5 A. Correct.

6 Q. And you mentioned this a little
7 bit earlier, but an overkill is when
8 something is taken down even though it
9 doesn't actually violate TikTok's community
10 guidelines, right?

11 A. That is correct.

12 Q. Okay. So this says: Reduce
13 overkills and hence reduce the stay duration
14 loss by 0.2%.

15 Do you see that?

16 A. That's correct.

17 Q. Stay duration means how long
18 people are on TikTok, right?

19 A. Stay duration, I don't know the
20 exact definition of the metric, but
21 directionally, that would be right.

22 Q. Okay. Let's go back to the
23 first page of this document. So the first
24 thing is zero, and it has Key Metrics Target
25 on the front.

1 Do you see that?

2 A. Correct.

3 Q. Okay. And the first thing
4 under the key metrics target is DAU target,
5 right?

6 A. That is right.

7 Q. And so for the second quarter
8 of 2023, TikTok's DAU target, or daily active
9 user target, was for the global version of
10 TikTok to go up to 964 million daily active
11 users; is that right?

12 MR. DRAKE: Objection, lacks
13 foundation.

14 A. This is not my expert area.
15 It -- yeah, I don't pay attention to -- these
16 are not my metrics, so...

17 BY MS. CRAICK:

18 Q. The document says: DAU Target,
19 global, base version, 964 million.

20 Right?

21 A. That is right. I just don't
22 know what does "global, base version" mean,
23 but -- I would think what you're saying is
24 right, but this is not my expert area.

25 Q. Okay. But you are mentioned in

1 this document, correct?

2 A. That is correct.

3 Q. And you understood that one of
4 TikTok's key metrics was daily active users,
5 right?

6 MR. DRAKE: Object to form.

7 A. That is right.

8 BY MS. CRAICK:

9 Q. You said that is right?

10 A. The company's metrics would be
11 DAU, yeah.

12 Q. Okay. So for the DAU target,
13 US base version, it says 94.7 million.

14 Do you see that?

15 A. I see that.

16 Q. Okay. And that's plus
17 1.9 million.

18 Do you see that?

19 A. I do.

20 Q. And then there's an aggressive
21 version of increasing the DAUs to 95 million.

22 Do you see that?

23 A. That is right.

24 Q. Okay. And is it your
25 understanding that these goals are to

1 increase DAU from -- up to 94.7 million or
2 95 million just in quarter 2 of 2023?

3 MR. DRAKE: Objection, lacks
4 foundation.

5 A. I cannot speak for somebody
6 else's goals, but I think the spirit of this
7 document -- I don't know who wrote this
8 document. Is it the OKRs for -- it seems
9 like this is the OKRs for the full company,
10 right?

11 So in the full-company OKRs, I
12 would expect that there are goals for
13 business, for trust and safety, for DAU, for
14 ads. So that sounds reasonable. But I
15 cannot speak to the exact metrics for these
16 teams.

17 BY MS. CRAICK:

18 Q. Okay. But when you look at
19 this based on your experience at TikTok, you
20 understand that the goal is to increase US
21 daily active users to either 94.7 million or
22 95 million in Q2 of 2023, right?

23 MR. DRAKE: Objection, lacks
24 foundation and it's been asked and
25 answered.

1 A. I cannot -- again, this is
2 something -- you know, it -- this is not -- I
3 did not write this. This is a company
4 document. Very hard for me to, like, speak
5 to the details of this.

6 BY MS. CRAICK:

7 Q. Okay. So when you were working
8 as -- in trust and safety at TikTok, you
9 communicated directly with the CEO at times,
10 correct?

11 A. That would be right.

12 Q. Okay. And you communicated
13 directly with other senior leadership at
14 TikTok, correct?

15 A. That would be right.

16 Q. And you understood that one of
17 the key metrics that they were focused on was
18 daily active users, correct?

19 MR. DRAKE: Object to form and
20 it lacks foundation.

21 A. I think at the company level,
22 I'm sure DAU was a metric, yes.

23 BY MS. CRAICK:

24 Q. Okay. And another metric is
25 revenue.

1 Do you see that?

2 A. I do.

3 Q. Okay. And it says: Ads
4 revenue, accelerate ads revenue to
5 3,063 million.

6 Do you see that?

7 A. I do.

8 Q. And that would also be about
9 3 billion, right?

10 A. That would be right.

11 Q. Okay. It also says: Live
12 revenue, achieve revenue of 2.043 billion.

13 Do you see that?

14 A. I do.

15 Q. And e-commerce GMV, total GMV
16 target is 3.826 billion.

17 Do you see that?

18 A. That is right.

19 Q. Okay. And e-commerce, is it
20 your understanding that that refers to TikTok
21 Shop?

22 MR. DRAKE: Object, lacks
23 foundation.

24 A. I would think so, yeah.

25 BY MS. CRAICK:

1 CERTIFICATE

2 I, MICHAEL E. MILLER, Fellow of
3 the Academy of Professional Reporters,
4 Registered Diplomate Reporter, Certified
5 Realtime Reporter, Certified Court Reporter
6 and Notary Public, do hereby certify that
prior to the commencement of the examination,
SANDEEP GROVER was duly sworn by me to
testify to the truth, the whole truth and
nothing but the truth.

7 I DO FURTHER CERTIFY that the
8 foregoing is a verbatim transcript of the
9 testimony as taken stenographically by and
before me at the time, place and on the date
hereinbefore set forth, to the best of my
ability.

10

11 I DO FURTHER CERTIFY that I am
12 neither a relative nor employee nor attorney
13 nor counsel of any of the parties to this
14 action, and that I am neither a relative nor
employee of such attorney or counsel, and
that I am not financially interested in the
action.

15

16



17 MICHAEL E. MILLER, FAPR, RDR, CRR
18 Fellow of the Academy of Professional Reporters
19 NCRA Registered Diplomate Reporter
20 NCRA Certified Realtime Reporter
21 California CSR #13649

22

23 Dated: March 3, 2025

24

25