

AMENDED Exhibit 496

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-Furlong

59

4/11/2025 - MOP

Screen Time Restrictions for Minors

Objective

Identify opportunities to improve stakeholders' perception of TikTok as safe for teenagers.

In the US, TikTok is facing significant and impactful criticism that:

- * "We" give "spinach" to kids in China and "optium" to kids in America: [HYPERLINK "https://www.tiktok.com/@60minutes/video/7163362662066212142?_r=1&_t=8XWLFjPpWQ&is_from_webapp=v1&item_id=7163362662066212142" \h]
- * TikTok is "digital fentanyl": Rep. Gallagher: [HYPERLINK "https://gallagher.house.gov/media/press-releases/gallagher-tiktok-digital-fentanyl-addicting-our-kids" \h]

These accusations are increasing in tempo and being used as a justification to ban TikTok in the US.

Source: [HYPERLINK "https://bytedance.us.feishu.cn/docx/XhkEdynv1oN4AXx9yHQyEdysQb" \h]

GR Suggestions

- * Setting **default screen time limits** for teens during the week. EU GR suggests a daily limit of 120 minutes, AMS GR suggests a daily limit 90 minutes. (Teens can turn off this default limitation, but we should send more aggressive prompts/reminders to turn off TT if a teen watches more than the default.)
- * **Minimizing notifications** during school hours or after younger teens should be preparing for sleep would be helpful.
- * Continue leaning into parent outreach to **encourage adoption of family pairing** to allow parents to set the screentime limits that are right for their teen.

Source: [HYPERLINK "https://bytedance.us.feishu.cn/docx/XhkEdynv1oN4AXx9yHQyEdysQb" \h]

Announcement Recommendation - WIP

1+6?

Options Considered

Note: All proposed options have not been done by our competitors and would therefore be industry first.

Commented [1]: How do these options compare to competitors? How about Douyin?

Commented [2]: @Josh SticklerBoth added below

1. **[Moderate] Enable existing screen time management features by default for minors to address most common use cases of daily total usage (Daily screen time limit), taking breaks (Screen time breaks), and night time usage (Sleep reminders - currently A/B testing) - RECOMMENDED**

a. **Impact Estimate:** Enabling the daily screen time limit by default for Minors, on average, the estimated daily stay duration for Minors would be reduced by 10 mins during weekdays, and 15 mins during weekends. Details: [[HYPERLINK "https://bytedance.us.feishu.cn/docx/GoxidwBCmo4LumxYRA0uvzYQsbj" \h](https://bytedance.us.feishu.cn/docx/GoxidwBCmo4LumxYRA0uvzYQsbj)]. Additional analysis needed to understand impact of auto-enabling screen time breaks and/or sleep reminders

b. **Pros:** Less Stay Duration impact than hard lined restrictions

c. **Cons:**

i. Less effective at drastically reducing screen time since interventions can be bypassed and therefore might not be a compelling change to regulators

1. Mitigation: ?

ii. We need to take a stance on a healthy amount of screen time which is controversial

1. Mitigation: We decide this based on third party guidance. It shouldn't come from us

d. **Notes:** Can't just auto-enable daily screen time limit right now since a pin code is needed to set it up. Would need to re-work feature UX

2. **[Moderate] Build "cool down period" feature that requires a 10(?) minute break from the app after hitting a daily limit to discourage bypassing the intervention**

a. **Impact Estimate:** need to A/B test

b. **Pros:** Somewhat hard-lined approach to improve effectiveness of existing daily screen time feature rather than a blanket lock out

c. **Cons:** Not very substantial on its own, should be added onto a broader strategy

d. **Notes:** This is a partially validated idea already based on consultation from Stanford Brainstorm

3. **[Extreme] Establish hard-lined limits that restrict screen time at a daily level or during common sleeping hours**

a. **Impact Estimate:** With a 120 minute hard cap, stay duration would decrease on average by ~25%. With a 90 minute hard cap, stay duration would decrease on average by ~33%. Details: [[HYPERLINK "https://bytedance.us.feishu.cn/docx/GoxidwBCmo4LumxYRA0uvzYQsbj" \h](https://bytedance.us.feishu.cn/docx/GoxidwBCmo4LumxYRA0uvzYQsbj)]

Commented [3]: The more I think about it, the more I feel like we're inherently taking some level of a stance on healthy usage by even having the multiple choice (40,60,90,120). So I've been mulling over — is a combo of Option #1 and Option #5 a potential path forward? How I'm thinking that looks: 1. All teens have 120 min (highest choice) on by default in their settings. 2. After 100 min of use (the current upsell), all teens get prompted to review Screen Time setting (current upsell functionality) and to set a pin. I think the question becomes can they opt out of Screen Time altogether? We can announce that we're "on by default", proactively encouraging teens to review settings prior to hitting that limit, and continuing to consult with experts to hone in on the best way to support teen's healthy app usage.

Commented [4]: @Christina CrimminsTotally a potential path forward. No matter what we do we need to re-work the daily screen time limit UX anyways so this should be an option we consider

Commented [5]: Why? (I'm not challenging this per se, but I want to understand "what bad thing happens" if we take a stance, either explicitly or implicitly on what a "healthy duration" is)

Commented [6]: @Josh SticklerThe typical pushback is "not all screen time is equal", i.e. we can't prescribe an amount of screen time because it's hard to know how much of it is valuable vs. not. This opinion was consistent across internal SMEs and external consultants like Digital Wellness Lab and Stanford Brainstorm

Commented [7]: Do we have existing relationships w/ 3rd parties whom we could rely upon to endorse whatever limits we implement? Or, is there existing, public guidance we can point to as the inspiration for the limits that we select?

Commented [8]: @Josh SticklerYes we can try to work with existing external partners and probably kick off those conversations with public domain info. This is what I was referring to in our chat with Christina re: buying more time

- b. Pros: Most effectively curbs minor screen time, Industry leading
- c. Cons:
 - i. Biggest stay duration impact
 - ii. Incentivizes more minors to lie about age to avoid this restriction, causing downstream privacy and safety problems
 - 1. Mitigation: In 2023 we have various plans to mitigate age lying to improve age accuracy on TikTok. Note that if this increases the number of self reported teens on the platform, that will increase the projected Stay Duration impact
 - iii. We need to take a stance on a healthy amount of screen time which is highly controversial
 - 1. Mitigation: We decide this based on third party guidance. It shouldn't come from us
- 4. **[Less Extreme] More visible prompt to adopt features during onboarding**
 - a. Impact Estimate: ? conversion rate of adopting features from upsell or Screen time page
 - b. Pros: Improved visibility in user journey should drive more adoption
 - c. Cons: Dilutes new user experience
- 5. **[Less Extreme] More visible prompt once a minor reaches a relevant usage threshold (e.g. 60 minutes in a session or 90 minutes in a day)**
 - a. Impact Estimate: ? how many users hit that criteria + conversion rate of adopting features from upsell or Screen time page
 - b. Pros: More contextual and targeted to the users who need screen time management
 - c. Cons: Still optional to opt in, we can estimate ~4% of users will convert to adopting the tools this way based on historical data from [HYPERLINK "https://bytedance.feishu.cn/wiki/wikcnLZoAu0mQDBGQ7eVKnS8tHb" \h]

What have we built already?

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2022 Impact Snapshot

Success Metric	2022 Changes
User awareness	68m/9.4% unique users have visited the revamped Screen Time page (formerly Digital Wellbeing)

User adoption Total STM DAU: 1.2m --> 19.2m/2.2% (+16x) (Douyin = 4% DAU)

- * Daily screen time limit: 1.2m --> 7.7m (+6.4x)
 - o +3.4x increase in L12 usage one month after launching [[HYPERLINK "https://bytedance.feishu.cn/wiki/wikcnLZoAu0mQDBGQ7eVKnS8tHb" \h](https://bytedance.feishu.cn/wiki/wikcnLZoAu0mQDBGQ7eVKnS8tHb)]
- * Screen time breaks: 0 --> 5.7m (June launch)
- * Weekly screen time updates: 0 --> 5.8m (June launch)

External awareness / trust "From June 9 - 12, we've seen **1,991** mentions on social media in relation to TikTok's screen time & well-being announcement, amassing **3,846** engagements and reaching **102 million people** across the globe." [[HYPERLINK "https://bytedance.us.feishu.cn/docx/doxus3Hdf97NtolbwKwbFEfSgCd" \h](https://bytedance.us.feishu.cn/docx/doxus3Hdf97NtolbwKwbFEfSgCd)]

- * *For comparison, this is a similar amount of coverage that TikTok LIVE subscription and Effect House had combined

Industry Benchmark

No competitors have built any hard-lined restrictions, so all options above would be first of their kind. All features below are opt in interventions

[sheet-shtuswjqZZyg3bcjbl00L9obnBe_PBsRZi]

Source: [[HYPERLINK "https://bytedance.us.feishu.cn/docx/doxcnP5sfk6JA71VoBbTN7m7Nfb" \h](https://bytedance.us.feishu.cn/docx/doxcnP5sfk6JA71VoBbTN7m7Nfb)]

Douyin's Stance

[[HYPERLINK "https://bytedance.feishu.cn/docs/doccnvRu7XDuA6sdLUTCb9GZY2d" \l "line-49" \h](https://bytedance.feishu.cn/docs/doccnvRu7XDuA6sdLUTCb9GZY2d)] = Screen time management feature set overview. Important to note they use their age model to deliver interventions

- * Screen time management tools + upsell if users haven't enabled: dashboard, similar controls to what we offer on TikTok

- * Proactive reminder video that shows after 40 min of cumulative usage or 20 minute single session
- * Toast reminder after one hour of cumulative time during the week or two hours of cumulative time on the weekends
- * Full screen reminder that a user can swipe through
- * Full screen reminder that requires a 15 minutes break after
- * Mask reminder - can't be bypassed by the user

Commented [9]: *Details pending response from Douyin team

DOCUMENT METADATA

Bates Number: TIKTOK3047MDL-004-00151111-TIKTOK3047MDL-004-00151117

BEGATTACH: TIKTOK3047MDL-004-00151111

ENDATTACH: TIKTOK3047MDL-004-00151117

Attachment Count: 0

PRODVOL: TIKTOK3047MDL-004

Custodian: JORDAN FURLONG

File Path: /ITEMS

Confidentiality Designation: HIGHLY CONFIDENTIAL (COMPETITOR)

HASHVALUE: B045CC592515BD2C624B2A0D14AEA253

DocType: E-DOC

Author: JORDAN FURLONG

Create Date: 12/21/2022 12:16 PM

Last Modified Date: 12/22/2022 12:53 PM

LAST MODIFIED BY:

TRACK CHANGES:

COMMENTS:

HASHIDDENATA:

Filename: SCREEN TIME RESTRICTIONS FOR MINORS-DJD6DNBJJOHM1SXZ8XPUZBDLSZW.DOCX

Title:

DOCEXT:

Email From:

Email To:

Email CC:

Email BCC:

Received Date: 12/31/9999 7:00 PM

Sent Date: 12/31/9999 7:00 PM

TIMEZONE:

Subject:

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THREADID:

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