

AMENDED Exhibit 505

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

ANSA T&S alignment channel

Keenan Exhibit

24

3/25/25 Carrie Campbell, #13921

exhibitsticker.com

[REDACTED] 2021-03-03 16:19:38

@Cormac Keenan Sure, reviewing now

[REDACTED] 2021-03-03 16:24:31

This looks like a violation of buttocks or pubic region of adult, though honestly it took awhile to assess because it's a bit gray area for me.

[REDACTED] 2021-03-03 16:24:49

I'll sync with the IM to action on it now

Cormac Keenan 2021-03-04 20:57:40

<https://vm.tiktok.com/ZMeM2CMT7/>

[REDACTED] 2021-03-04 21:28:54

@Cormac Keenan The video would fall under fetishism (incest), allusion to sexual activity, Sexually Suggestive Language and potentially Non consensual sexual act (adult in the video expressed not to consent). [REDACTED] could you confirm the NCST violation and follow up with IM Bay for take down? I also noticed that according to his bio, the user was banned from Tik Tok previously and created this new account. His new account does not have other ANSA violations, but it would be interesting to see if we could establish the reason we previously banned him. This may help inform us on how to better deal with recidivism in the ANSA space.



[REDACTED] 2021-03-04 21:37:13

[REDACTED] definitely see the NCSA violation. I'll contact Bay IM now

Cormac Keenan 2021-03-12 11:48:46

Not urgent just wondering where this falls <https://vm.tiktok.com/ZMekeWfUA/>

2021-03-12 12:02:20

This video falls under the Hard to Find category per our liberal countries playbooks, triggering the following policy titles: culturally inappropriate clothing (NR), sexualized framing (NR), Sexually Seductive Adult Performances (General+L1), Overtly exposed breast area (General +L1) and finally Adult overtly exposing torso or thighs (General + L1).

Cormac Keenan 2021-03-15 22:20:41

Have we reviewed hashtags #bugsbunny or #bugsbunnychallenge? Just wondering if this is general as per policies



2021-03-15 22:52:09

lead the efforts to auto NR such content, following the logic we adopted to deal with the Silhouette Challenge. In her words: "A trend of users imitating having rabbit ears with their feet behind their heads + twerk on the floor is found in global markets. Global assessment is that this is sexual framing due to intention of the video to fixate on buttocks. 65% of the associated audio ID results in NR videos and less than 2% are violation videos. We are conducting global sweeps and working with PnP to increase accuracy for batch action".

System Message 2021-03-16 16:46:56

i invited to this chat. New members can see all chat history.

Julie de Baillencourt 2021-03-18 14:09:09

2021-03-18 14:11:15

they have something similar. called simulation

 Julie de Baillencourt

2021-03-19 03:52:00

@Julie de Baillencourt That's in a sense the Golden Set QA process that I'd recommend us to use:

 Julie de Baillencourt

Cormac Keenan 2021-06-17 09:14:18

Hey Guys - I might be in a filter bubble but I'm seeing a high frequency of these sex toy videos <https://vm.tiktok.com/ZMdrdWxeU/> can we look to see if we've an enforcement gap?

2021-06-17 09:29:27

@Cormac Keenan thank you for flagging this. Looking into it now.

 Julie de Baillencourt

2021-06-17 09:52:01

@Cormac Keenan I'm trying to expand our search, but it seems that the video and account is quite unique (single account and device ID, no duplicate videos found, doesn't use hashtags). Were the other videos in your bubble from the same creator or different accounts/videos?

2021-06-17 10:04:37

Cormac Keenan 2021-06-17 10:06:32

[REDACTED] here's the other one I saw <https://vm.tiktok.com/ZMdrRL9Na/>

[REDACTED] 2021-06-17 10:12:44

feels like we should replicate @Cormac Keenan 's feed on a big screen somewhere, to help us track such things down



[REDACTED] 2021-06-17 10:13:30

[REDACTED]

[REDACTED] 2021-06-17 10:14:27

small correction: the link in the account that was shared was sexually explicit so it would fall under "Sexual Solicitation Involving Adult" and currently result in a permanent account ban.



[REDACTED] 2021-06-17 10:14:46

I have asked in the past before whether we could use the recommendation algorithm to find more bad content using violative seed videos. However, their stance was that this is not feasible

[REDACTED] 2021-06-17 10:14:46

[REDACTED]

██████████ 2021-04-09 06:58:41
██████████ Calling the API would mean that each seed video is treated as an entirely independent video. Just like how the recommendation system understands your preferences better better when you have watched more videos, I imagine that the Viking service would be able to provide more relevant similar videos if it's given a set of videos and treat it as a single feed. This is already a great tool for us to start exploring! Just wanted to know whether you think it would be valuable to explore the idea of using a set of videos as a seed.

██████████ 2021-04-09 07:08:32

██████████ Viking is a recall service and it can only do specific things (in this service it returns similar videos). What you mean is to build a whole and complex recommend system. Suppose a scenario: given a dog video and a sports video, what do you expect the sim-tool return? 5 dogs + 5 sports or 10 dog playing sports? It's hard to measure the similarity for a sets of seeds and impossible to implement it.

██████████ 2021-04-09 08:12:10

██████████ I agree, that's a very difficult problem. One crucial point is that we have to make sure that the set of seed videos that we give the system is thematically the same. Also, that's why I was wondering whether there is a way for us to leverage the recommendation system. The TikTok recommendation system doesn't break if a user likes dogs and sport videos, so how does it take this information and generate a feed of related videos? Can we make use of this technology for abuse detection?

██████████ 2021-04-09 08:31:02

██████████ I don't think the tiktok recommendation system is suitable for abuse detection. The main goal of tiktok rec-sys is to improve user's retention and stayduration, so the system includes not only relevance, but also diversity, exploration, video cold start, long video, publish guiding and many other aspects.

Cormac Keenan 2021-06-24 10:19:45

Can we review this account please? <https://vm.tiktok.com/ZMdyGvPtD/>

██████████ 2021-06-24 10:31:46

@Cormac Keenan thanks for flagging. This account should be banned for sexual solicitation (link in profile leads to sexually explicit site) - I'll forward to our teams to take action on it

Cormac Keenan 2021-06-26 08:30:53

Can we take a look at this account? I don't speak Portuguese but this looks like a sexual solicitation account <https://vm.tiktok.com/ZMdPNqsdf/>

2021-06-28 01:39:12

@Cormac Keenan this account looks like it is used to discuss a sex worker's experiences, rather than offering sexual material/services for compensation. Not a Portuguese speaker myself but roughly translated with Google, there are captions/sticker text that support this (the handle "diary of a prostitute," interacting with/answering questions like "what do you like to do in your spare time" "why do you disable the comments" "I'm in prostitution for the freedom, I still have friends and family") there are directions to follow the user on instagram, and while most of the instagram content is the same, the instagram does contain a signal that we'd classify as solicitation on TT (a post says "in May, pay to see"). However we are conscientious to moderate only based on what we can see on TT and I did not see an equivalent indicator for solicitation on the TT account There are three videos depicting acts of prostitution (waiting on the street for customers) which can be removed at the video level under IARG "promotion of adult prostitution" policy. I'll doublecheck my solicitation assessment with country policy in case I missed any language indicators, and share with IARG team for confirmation on the "promotion of adult prostitution" videos

2021-06-28 06:39:50

Quick follow up here: IARG confirmed that the three videos in questions will not trigger the "promotion of adult prostitution" policy as there is no promotion element. For the three videos, given that there are no signals of exchange of money/material goods for sexual services, they will not be controlled

 Julie de Baillencourt, Cormac Keenan

Cormac Keenan 2021-06-28 08:15:39

Thank you this makes sense

DOCUMENT METADATA

Bates Number: TIKTOK3047MDL-024-LARK-00040453-TIKTOK3047MDL-024-LARK-00040458

BEGATTACH: TIKTOK3047MDL-024-LARK-00040453

ENDATTACH: TIKTOK3047MDL-024-LARK-00040458

Attachment Count: 0

PRODVOL: MDL-024

Custodian: [REDACTED]

File Path: /TIKTOK3047MDL-024-LARK-00040453.PDF

Confidentiality Designation:

HASHVALUE:

DocType:

Author:

Create Date: 3/3/2021 12:00 AM

Last Modified Date: 3/3/2021 12:00 AM

LAST MODIFIED BY:

TRACK CHANGES:

COMMENTS:

HASHIDDENATA:

Filename: TIKTOK3047MDL-024-LARK-00040453.PDF

Title:

DOCEXT: .HTML

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:

Case 4:22-md-03047-YGR

Document 2875-58

Filed 03/25/26

Page 9 of 9

THREADID:

REDACTIONS:

REDACTION TYPE: