

AMENDED Exhibit 518

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

System Message 2023-03-08 20:47:36

"Translate as you type" is on. You can type in your preferred language to communicate

Jamie Favazza 2023-03-08 21:14:21

@Andrea Rungg Thanks for your help! Do we have an update on this piece?

 Andrea Rungg  **YES** Andrea Rungg

Suzy Loftus 2023-03-08 22:14:28

@Xiangjun Fan I just tagged you in the doc on a few of the algo specific questions -- can you take a look and add any evidence we have to address the claims/questions.

 Jamie Favazza

Xiangjun Fan 2023-03-08 22:24:38

@Suzy Loftus Thanks, **@Yifan Wu** and I have proved reading the section you tagged, it is from TT PM team **@Siyu Shen**, who is the same person working on filter bubble projects with us, so the description is accurate.

 Suzy Loftus

Suzy Loftus 2023-03-09 01:47:02

Can we please add **@Ryn Linthicum (they/them)**

 Jamie Favazza  Jamie Favazza  Ryn Linthicum (they/them)  Julie de Baillencourt

EXHIBIT

30

TIKTOK-LINTHICUM

Jamie Favazza invited **Ryn Linthicum (they/them)** to this group. New members can see all chat history.

System Message 2023-03-09 01:49:49

"Translate as you type" is on. You can type in your preferred language to communicate

Jamie Favazza 2023-03-09 05:00:47

POST

Title:

Text:

Hi team - Quick update to close the night from Comms -- we're planning to speak to the reporter tomorrow to clarify questions and push back on incorrect assumptions and/or information as a next step based on the information we have so far (thank you!!). In order to do this effectively and with a full picture of information, we're eager to close out fact finding on the following items tonight or first thing in the morning. This information is also critical to additional mitigation steps we're exploring, so we appreciate everyone's support and attention [双手合十]

- The final outcome of the account investigation led by @Rebecca Pober cc @Suzy Loftus
- Key proof points that show the impact of our dispersion work, specifically, the metrics to show improvements to the viewer experience over the last year (thank you for the back and forth on this so far!). Note this data should be validated and defensible if shared publicly @Mabel Wang @Siyu Shen @Yifan Wu
- Confirmation that we do not have code written in Mandarin and a few other algo qs noted in the doc@Xinghai Hu

 Suzy Loftus, Rebecca Pober, Hilary McQuaide, 沈思予, Xinghai Hu, Julie de Baillencourt, Eric Han, Emily Stubbs

Rebecca Pober 2023-03-10 01:58:55

POST

Title: USDS TnS Update

Hey all, we've completed a review of [Redacted - PII] account which can be found below. We are still awaiting model insights to confirm our filter bubble claims, but we have high confidence in this based off an in-depth review of the content.

Overall, user [Redacted - PII] was repeatedly shown videos surrounding SSH-related topics, and he likely fell into a SSH filter bubble potentially driven by his watch, search, and other discoverability behavior. He engaged in a variety of discoverability methods for video content across the FYF, Music Pages, Profiles, and Search, with the FYF (60%), Music (15%), and Search (11%) leading him to most of the viewed violative SSH content.

Videos

Based on a review of ~7,500 videos in the 2 weeks leading up to the user's death (2/3/2022 - 2/18/2022), nearly 10% violated our Community Guidelines, mostly for Suicide and Self Harm.

- General Content: While 73% of the content was non violative, common themes of videos watched included testimonials of suicide survivors, mental health struggles, suicide awareness, and longing to be in a relationship or sadness over a break up.

- Violative Content: Common themes of the violative videos included image slideshows or images with memes and messages about deep depression, low self-esteem, loneliness, feeling tired, and suicidal ideation.

Enforcement Breakdown:

- 3% Violated today for SSH
- 6% Previously Violated between user's view and today's review
- 7% User Deleted
- 11% No Result in Tool
- 73% Approved

Search

The phrases and words the user searched largely encompassed musical artists and lyrics who struggled with depression and drug addiction and/or published sad music. On 2/17/2022, the user's searches referenced suicide and trains, and on 2/18/2022, additional searches led him to depressive and suicide-related content.

Majority of Searched & Favorited content on the day of the user's death portrayed heavy topics such as depression, loneliness and allusions to suicide, some violating our SSH policies.

More details can be found here: [@Eric Han @Jamie Favazza](https://bytedance.us.feishu.cn/docx/QBP0dMSIUozbXMxAYx5ulWbhssecc)

 Julie de Baillencourt, Jamie Favazza, Hilary McQuaide

 Suzy Loftus, Ryn Linthicum (they/them), Tara Wadhwa, Hilary McQuaide, Christina MacDonald, Jamie Favazza

POST

Title:

Text:

Thank you @Rebecca Pober for the T&S update -- this is super helpful and lots of learnings from your investigation [玫瑰]

As an update from comms, we spoke to the reporter today and learned it's even more expansive than she had originally shared. This story is about algorithmic design and people seeing steady streams of content on topics related to suicide, self-harm, and eating disorders. The reporter spoke with a number of young people who use TikTok and say they're seeing this type of content recommended, and has viewed screen recordings of the viewing patterns of these teens.

Importantly, based on conversations with former and currently employees, she's under the impression that trust and safety does not work with our product team, and that our recommendations algorithm is seen even inside the company as a 'black box'. We know this is false. We believe she's trying to sow a narrative that says engineers block T&S efforts to safeguard recommendations, and that ByteDance works to prevent algorithmic transparency within the company. We are working to push back on these false impressions and incorrect claims.

Next steps

- We are developing on-the-record quotes to show empathy for these issues, our action and progress; as part of this, we are exploring a potential interview
- We are setting the record straight on a number of inaccurate claims related to Douyin, TikTok, and our teams through fact-checking
- We are developing proactive comms strategies to show progress ahead of the story as we anticipate its timing could be March 22; this could include moving up the roll out of Refresh (we've confirmed this is technically possible) and sharing progress on our dispersion work

 Cormac Keenan  Eric Han, Suzy Loftus, Julie de Baillencourt, Tracy Elizabeth

 Hillary McQuaide, Christina MacDonald, Tara Wadhwa, Rebecca Pober, Ryn Linthicum (they/them), Sandeep Grover

System Message 2023-03-10 02:40:32

Jamie Favazza invited **Lisa Hayes** to this group. New members can see all chat history.

System Message 2023-03-10 13:10:34

System Message 2023-03-10 14:12:33

Jamie Favazza invited **Julian Darrall** to this group. New members can see all chat history.

System Message 2023-03-10 16:35:11

Jamie Favazza invited **Jessica Stanfield** to this group. New members can see all chat history.

System Message 2023-03-15 16:36:35

Mahsau Cullinane invited **Will Grosswendt** to this group. New members can see all chat history.

Jamie Favazza 2023-04-12 17:52:10

Redacted - Attorney Client

Rebecca Pober 2023-04-12 22:58:06

@Jamie Favazza Yes, our enforcement teams took action on the 10% of content identified reactively as violating our current Community Guidelines to protect users and prevent future views. Worth noting since we update our policies over time, some of the content published and watched during this timeframe (Dec 2021 to Feb 2022) may have been allowed at the time but are no longer allowed under current CGs. Please let me know if I can aid with any additional questions[玫瑰]

 Jamie Favazza

Kathy PourSanae 2023-04-12 23:03:45

@Rebecca Pober **Redacted - Attorney Client**
Redacted - Attorney Client

Redacted - Attorney Client

Rebecca Pober 2023-04-13 16:36:47

<p>@Kathy PourSanae

Redacted - Attorney Client

Redacted - Attorney Client

 Kathy PourSanae

Kathy PourSanae 2023-04-13 17:06:54

@Rebecca Pober

Redacted - Attorney Client

 Rebecca Pober

Jamie Favazza 2023-04-21 20:47:25

POST

Title:

Text:

Hi team, Sharing a media analysis of yesterday's Businessweek feature on repetitive recommendations of suicide, self-harm, and eating disorder content, which includes:

- Key perception takeaways and recommended actions we could take to improve perception in these areas
- Strategies and updates that helped demonstrate our commitment to safety and well-being ahead of publication
- Challenging claims we successfully removed from the story or neutralized through strategic mitigation
- Areas where we were not as successful in our mitigation, whether because the reporter chose to omit information, litigation constraints, or other reasons.

Please let us know if you have questions or ideas as we look to continue to build trust and improve perception in these challenging areas in the near and long term. Thank you again to everyone who partnered with us on this challenging and sad story:

<https://bytedance.us.feishu.cn/docx/JScmdVUH1oTdA9xdEE7ulW44sdb>

 Justin Erlich  Ryn Luthicum (they/them), Ben Rathe, Sophy Silver, Kathy PourSanae, Lisa Hayes, Andrea Rungg, Rebecca Pober

DOCUMENT METADATA

Bates Number: TIKTOK3047MDL-150-LARK-07275923-TIKTOK3047MDL-150-LARK-07275929

BEGATTACH: TIKTOK3047MDL-150-LARK-07275923

ENDATTACH: TIKTOK3047MDL-150-LARK-07275929

Attachment Count: 0

PRODVOL: MDL-150

Custodian: CRIMMINS, CHRISTINA; DE BAILLENCOURT, JULIE; ELIZABETH, TRACY; ERLICH, JUSTIN; GROVER, SANDEEP; KEENAN, CORMAC; LINTHICUM, RYN; SHEN, SIYU; WADHWA, TARA; WANG, MABEL

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Subject:

THREADID:

REDACTIONS: Y

REDACTION TYPE: PRIV