

AMENDED Exhibit 521

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

Rosie King

1

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT) MDL No. 3047
ADDICTION/PERSONAL INJURY)
PRODUCTS LIABILITY LITIGATION) Case No.
) 4:22-MD-3047-YGR
This Document Relates to:)
ALL ACTIONS)

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

COORDINATION PROCEEDING) Lead Case No.
SPECIAL TITLE [RULE 3.550]) 22STCV21355
)
SOCIAL MEDIA CASES) JCCP No. 5225
)
This Document Relates to:) Judge:
) Carolyn B. Kuhl,
ALL ACTIONS) Dept. 12

Tuesday, April 29, 2025

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Videotaped deposition of ROSIE KING,
held at Regus - London, St. James, 4th Floor,
Rex House, 4-12 Regent Street, London SW1Y 4RG,
England, United Kingdom, commencing at 9:22 a.m.
British Summer Time, on the above date, before
Leah M. Willersdorf, Registered Merit Reporter and
Certified Realtime Reporter with the US National Court
Reporters Association, and Fellow of the British
Institute of Verbatim Reporters, Accredited Court
Reporter, Qualified Realtime Reporter (Level 2) and
Certified LiveNote Reporter.

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deps@golkow.com

1 A. I was giving evidence on behalf of the
2 Met Police.

3 Q. Okay.

4 A. It was a criminal case.

5 Q. And this was as part of your employment?

6 A. Yes.

7 Q. Okay.

8 MR. MURA: James, can you please bring up
9 tab 0.

10 (TikTok-King-1 marked for identification.)

11 MR. MURA: And I am marking tab 0 as
12 TikTok-King-1. This document has Bates stamps
13 ROSIEKING-DEPOCOPY-MDL, a series of 0s, 14.

14 BY MR. MURA:

15 Q. Ms. King, do you recognize this document?

16 A. Yes.

17 Q. And what is it?

18 A. It's my CV.

19 Q. Okay. Can you please turn to the second
20 page.

21 A. Yep.

22 Q. Do you see where it says "Education"?

23 A. Yes.

24 Q. It indicates you went to Queens Mary
25 College [sic]; is that correct?

1 MR. DRAKE: Object to form.

2 THE WITNESS: Queen Mary's College, yes.

3 BY MR. MURA:

4 Q. Okay. Where did you go to school, as
5 listed in this resume?

6 A. What do you mean?

7 Q. I'll just ask my question again because
8 there was an objection. Sometimes if there's an
9 objection, I may try to rephrase my question, so let
10 me ask my question again.

11 According to your resume, did you go to
12 Queens Mary College?

13 A. Queen Mary's College, yes.

14 Q. Okay. And you attended September 2014 to
15 June 2016, is that correct?

16 MR. DRAKE: Objection; leading.

17 THE WITNESS: Yes.

18 BY MR. MURA:

19 Q. Okay. And what degree is specified here?

20 MR. DRAKE: Objection.

21 THE WITNESS: I did a course for an
22 extended diploma in IT, which is a BTEC course. It
23 was a Level 3 one. It's essentially a
24 coursework-based equivalent to A Levels.

25 ///

1 BY MR. MURA:

2 Q. Okay. And did you receive any
3 distinctions for your studies?

4 A. Yes, I achieved the highest grade on
5 the course, which is Distinction*, Distinction*,
6 Distinction*.

7 Q. Okay. And your resume also lists
8 publications; is that correct?

9 A. Yes.

10 Q. And can you tell me about those
11 publications?

12 A. Yes. So I co-authored a peer-reviewed
13 paper in relation to, essentially, gambling ethics
14 appearing in video games. There was a video game that
15 I was moderating at the time called RuneScape and that
16 was as -- in relation to here, it's listed as "Player
17 Moderator for Jagex," and in that they introduced a,
18 essentially, roulette wheel-type thing which would
19 allow people to spend real-world currency to attain
20 in-game items which then, arguably, could have monies'
21 worth under UK law as a gambling, sort of, value.

22 And so the legislation at the time was
23 suggesting that this was not gambling and yet,
24 essentially, over the last few years, a lot of
25 different jurisdictions have moved towards the view

1 that loot boxes and similar things are, in fact,
2 actually gambling.

3 Q. Okay. And your resume indicates that this
4 was an article that was published in Gaming Law Review
5 and Economics.

6 Do you see that?

7 A. Yes.

8 Q. And is that accurate?

9 A. Yes.

10 Q. Let's go to the first page, please, and
11 we'll start at the bottom. The first thing you have
12 listed at the bottom is Community Moderator at
13 MailOnline.

14 Do you see that?

15 A. Yes.

16 Q. Can you please tell me what you did there?

17 A. So that was, essentially, comment
18 moderation but it was also monitoring articles for
19 legal compliance. MailOnline is a newspaper for
20 the Daily Mail, but it's the online version where
21 users can interact through the Comments section.

22 Q. And that was from March 2018 to May 2019?

23 A. Yes.

24 MR. DRAKE: Objection; form.

25 ///

1 BY MR. MURA:

2 Q. And so as part of that work, you would
3 identify legal issues and areas of risk; is that
4 correct?

5 A. Yes.

6 MR. DRAKE: Objection; leading.

7 BY MR. MURA:

8 Q. Before you started at MailOnline, what was
9 your past training in trust and safety work?

10 A. I volunteered with YouTube for a number of
11 years. I believe it started in 2013 and it went up
12 until sometime in 2022. I wouldn't say that it's
13 necessarily training; it was more through hobbies, but
14 I was identifying abusive content and I was often
15 advising the trust and safety team on policy matters.

16 Q. When you say you were volunteering, were
17 you working for YouTube or...

18 A. I was unpaid.

19 Q. Okay.

20 A. Yeah.

21 Q. The next entry says "Community Content
22 Moderator, Trust and Safety - TikTok."

23 Do you see that?

24 A. Yes.

25 Q. And it indicates the dates of employment

1 as May 2019 to November 2019; is that correct?

2 A. Yes.

3 MR. DRAKE: Objection; form.

4 BY MR. MURA:

5 Q. Is that accurate?

6 A. Yes.

7 Q. And what did you do at TikTok?

8 A. I was a content moderator. I believe one
9 of the other terms for it was community content
10 management specialist, and so this, essentially,
11 involved reviewing videos which came into queues and
12 then there was also things like private messaging and
13 some other people had different responsibilities, like
14 user age rating and things like that.

15 Q. Was part of your job to ensure user
16 safety?

17 A. Yes.

18 MR. DRAKE: Object to form.

19 BY MR. MURA:

20 Q. Was part of your job flagging safety
21 issues that you saw at TikTok?

22 MR. DRAKE: Objection; leading.

23 THE WITNESS: I feel like that is a
24 responsibility for anyone on a trust and safety team.

25 ///

1 BY MR. MURA:

2 Q. Okay. Do you see the next entry,
3 "Community Moderator - Trust and Safety for Byte"?

4 A. Yes.

5 Q. And do you see that the dates listed here
6 are May 2020 to November 2020?

7 A. Yes.

8 Q. Is that accurate?

9 A. Yes.

10 Q. And then there is a description.
11 Do you see that?

12 A. Yes.

13 Q. This was after you left TikTok; is that
14 correct?

15 A. Yes.

16 Q. And what was your role here?

17 A. It was, essentially, the same sort of
18 thing, in that I was reviewing short-form videos for
19 -- and comments and any kind of other user content,
20 like direct messages, for safety issues that may
21 relate to, you know, anything from policy violations
22 through to risk to life.

23 Q. And next, do you see an entry "Head of
24 Trust and Safety for Byte/Clash"?

25 Do you see that?

1 A. Yes.

2 Q. And the dates you listed here are
3 December 2020 to March 2022.

4 MR. DRAKE: Objection to form.

5 BY MR. MURA:

6 Q. Do you see that?

7 A. Yes.

8 Q. Is that accurate?

9 A. Yes.

10 Q. What did you do there?

11 A. So I was, basically, taking over the trust
12 and safety department and, with that, the company was
13 sort of going through a influx of new people. It was
14 around the time when Donald Trump was talking about
15 banning TikTok, ironically, actually. And there was
16 a very large influx of minor users and the main thing
17 that I was focusing on was trying to manage that,
18 mainly by banning them and then handling the data
19 deletions.

20 But it was, essentially, running the
21 moderation teams, dealing with any emergencies that
22 came through. This may include, for example, if there
23 was child abuse imagery that was uploaded or if
24 someone had posted something that made us believe that
25 their life was in danger.

1 MR. DRAKE: I'll motion to strike the
2 nonresponsive portions of the answer.

3 MR. MURA: I'll object.

4 BY MR. MURA:

5 Q. Did this include child protection matters?

6 A. Yes.

7 MR. DRAKE: Objection; leading.

8 BY MR. MURA:

9 Q. And you mention here NCMEC.

10 Do you see that?

11 A. Yes.

12 Q. And IWF reporting.

13 Do you see that?

14 A. Yes.

15 Q. Can you explain to me what that is?

16 A. Yeah. So NCMEC is the National Center for
17 Missing & Exploited Children, which is a US body that
18 platforms are supposed to report to as a matter of law
19 when they come across child abuse content. This
20 includes anything from grooming messages through to
21 child abuse imagery straight out. And the UK
22 equivalent of that is IWF, Internet Watch Foundation.

23 Q. And right after that, it says:

24 "Developed the community guidelines,
25 provided guidance to moderators and oversaw quality

1 assurance."

2 Do you see that?

3 A. Yes.

4 Q. Can you please explain that work to me?

5 A. Yes. So I'll break it into parts.

6 Developing the community guidelines: I rewrote the
7 entire rule set that the users had, to address issues
8 that started occurring with the larger influx of
9 users. I was addressing things to try and sort of --
10 a safety-focused scope on everything, to pre-empt
11 harms as opposed to react to them, to try and minimize
12 the damage that could later occur.

13 And then with the providing guidance to
14 moderators, this would be where I would sample what
15 they were doing and I would give them feedback on
16 their escalations or any other reports that they were
17 making, and I would also review the content at random,
18 make sure that the actions being taken were accurate
19 in relation to the guidelines, and that it was fair to
20 the users.

21 So that is the guidance to moderators and
22 quality assurance part.

23 Q. And next, you have listed "Intelligence
24 Researcher for the Metropolitan Police."

25 Do you see that?

1 I noticed it and flagged it.

2 BY MR. MURA:

3 Q. And how often would US content end up in
4 the UK queue?

5 A. Quite frequently because the content would
6 cross over when it was applied either a General status
7 or certain policies would allow flowing into different
8 markets.

9 MR. MURA: Let's pull up tab 2. This is
10 TIKTOK3047MDL-066-LARK-00942348, which I am marking as
11 Exhibit 3.

12 (TikTok-King-3 marked for identification.)

13 BY MR. MURA:

14 Q. Ms. King, why don't you take a look at
15 this and let me know when you've had a chance to
16 review it.

17 A. Thank you.

18 Q. Ms. King, what is this document?

19 A. These are conversations between myself and
20 the head of trust and safety.

21 Q. And by "the head of trust and safety" --

22 A. Yuyi Fu.

23 Q. Yuyi Fu. And you see your name at the top
24 and Yuyi Fu -- or Fu Yuyi?

25 A. Yuyi, yes.

1 Q. And did you start this Lark chat?

2 A. Yes.

3 Q. And the date of it is August 23, 2019.

4 Do you see that?

5 A. Yes.

6 Q. You start the message by saying:

7 "Yuyi, I have seen you on a number of
8 occasions talk about planning for future safety
9 operations and the optimization of processes. I've
10 been involved in moderation for many years and have
11 always taken a deep interest in understanding why
12 things are done in certain ways and how to improve
13 them. I've previously helped other companies,
14 including YouTube, with issues relating to
15 user-generated content and policy, primarily focusing
16 on safety matters."

17 Do you see that?

18 A. Yes.

19 Q. Next, you say:

20 "I joined the company on the 14th of May
21 2019 and was encouraged to maintain an outsider
22 perspective on issues by [REDACTED]"

23 Do you see that?

24 A. Yes.

25 Q. And when you say you joined the company,

1 are you referring to TikTok and ByteDance?

2 A. Yes.

3 MR. DRAKE: Object to form. It's vague
4 and ambiguous.

5 BY MR. MURA:

6 Q. And who is [REDACTED]

7 A. [REDACTED] at the time was my boss's boss.

8 Q. And when you say your boss's boss, who was
9 your boss?

10 A. My boss was [REDACTED].

11 Q. So this [REDACTED] was [REDACTED]'s boss?

12 A. At the time, yes.

13 MR. DRAKE: Object to form.

14 BY MR. MURA:

15 Q. And what did you mean by "maintain an
16 outsider perspective"?

17 A. So by maintaining an outsider perspective,
18 it's looking at what was happening from how users
19 would see it, and looking at things without, sort of,
20 isolating the opinion or, sort of, like, narrowing
21 the focus.

22 Q. And next, you say:

23 "Attempting to understand the approach
24 better, I found myself often discussing existing
25 policies with colleagues and, for a brief amount of

1 time, even going as far as drafting a new-approach
2 framework, which later was discouraged following
3 business changes."

4 Do you see that?

5 A. Yes.

6 Q. And then you wrote:

7 "I am writing to you primarily to raise
8 some concerns, both from an outside and inside
9 perspective..."

10 Do you see that?

11 A. Yes.

12 Q. What did you mean by "outside and inside
13 perspective"?

14 A. Well, outside -- the way that users would
15 look at a lot of these things is if they were posting
16 about abuse, for example with the social media
17 elements, if they were posting, you know, saying
18 someone is harassing me or someone is harassing this
19 person, or something's gone terribly wrong, even if
20 it's, like, on Twitter, they -- that's an outside
21 perspective. It's a user's view.

22 Inside perspective is, sort of, the
23 content moderator's view, the way that it would be
24 seen internally, as in on a trust and safety team,
25 like what concerns would you have about what's

1 happening or not happening.

2 Q. And when you wrote that you went "as far
3 as drafting a new-approach framework which later was
4 discouraged following business changes," what did you
5 mean by "discouraged following business changes"?

6 A. So part of the stuff that I was doing with
7 the consent of [REDACTED] was I was drafting policy
8 documents. My line manager was not happy with me
9 doing that. I believe the switch happened when [REDACTED]
10 [REDACTED] stopped being [REDACTED]'s boss and then it switched to
11 [REDACTED]

12 Q. And what were the goals of this policy
13 document?

14 A. It was to try and address issues that
15 I had seen whilst moderating and other issues that had
16 come up in discussion with colleagues.

17 Q. Were you trying to improve user safety?

18 A. Yes.

19 Q. And when you say you were discouraged,
20 who discouraged you? Is that [REDACTED]

21 A. Yes.

22 Q. Next, you wrote:

23 "The root concern is that there is very
24 little to no flow of information within the
25 department, and to other departments. It is difficult

1 to open conversation about concerns as a result, even
2 when regarding a large risk to TikTok as a product and
3 consequently ByteDance as a whole. Escalation of
4 concerns, both process and policy wise, as well as
5 safety in general, currently lead to a lot of
6 dead-ends or non-answers."

7 Do you see that?

8 A. Yes.

9 Q. And then you went on to write:

10 "An example of previously raised,
11 non-addressed issues include concerns about minors
12 appearing in videos; it is the law in all EU countries
13 for users to be age 13-16 depending on the
14 jurisdiction but we currently do not action videos
15 uploaded by obvious minors (as indicated by factors
16 such as behaviour, body development such as hands, and
17 voice)."

18 Do you see that?

19 A. Yes.

20 Q. What do you mean by "we currently do not
21 action videos"?

22 A. As in similar to the things mentioned
23 earlier where people would post videos and it could be
24 a very obvious child. We wouldn't, like, go and
25 straight out ban the user and, like, delete the data

1 or anything; it would be, essentially, flagging it
2 through adding a child tag and then it would kind of,
3 like, go off somewhere else.

4 There was a user rate queue, but I didn't
5 have enough interaction with that to be able to
6 determine what it did.

7 Q. And then you say:

8 "... nor do we have permission to action
9 users who proactively state in their user profile that
10 they are under the age required to own an account."

11 Do you see that?

12 A. Yes.

13 Q. At the time you wrote this, what was the
14 age required to own a TikTok account?

15 MR. DRAKE: Object to form, it's vague and
16 ambiguous and overbroad as to jurisdiction.

17 THE WITNESS: 13.

18 BY MR. MURA:

19 Q. And that was true for the US?

20 A. I believe so, yes.

21 MR. DRAKE: Object to form, lacks
22 foundation.

23 (Stenographer clarification.)

24 MR. DRAKE: That question lacked
25 foundation.

1 THE STENOGRAPHER: And your answer?

2 Sorry.

3 THE WITNESS: Yes, I believe that it
4 was 13 for the US as well.

5 THE STENOGRAPHER: Thanks.

6 BY MR. MURA:

7 Q. So even if a user said in their profile
8 that they were 9 years old, the company did not allow
9 you to remove the account as being under 13; is that
10 correct?

11 MR. DRAKE: Object to form, leading.
12 It's overbroad. It's vague.

13 THE WITNESS: I did not have a way of
14 dealing with that, no. I could flag it, but I never
15 saw anything happen based off of that alone.

16 BY MR. MURA:

17 Q. Next, you say:

18 "Previously in the United States,
19 TikTok/Musical.ly encountered a very similar issue in
20 regards to the collection of minors' data."

21 Do you see that?

22 A. Yes.

23 Q. So you were aware that it was illegal in
24 the United States for the company to fail to remove
25 users under 13 from the TikTok app, correct?

1 A. Yes.

2 MR. DRAKE: Objection; leading, lacks
3 foundation.

4 BY MR. MURA:

5 Q. You can answer.

6 A. Yes.

7 Q. And then you go on to say:

8 "Another example is in direct reference to
9 user safety; upon discovery of an account exhibiting
10 predatory activity, I escalated it to the predator
11 reporting group."

12 Do you see that?

13 A. Yes.

14 Q. Can you please explain what you meant by
15 that?

16 A. Yeah. So this was in relation to an
17 account that had videos of minors uploaded onto it,
18 that had obviously been self-produced by the minors
19 but the predator was using it to, sort of, save the
20 videos as, like, a collection or storage, and the same
21 person was then sending grooming messages to minors.

22 Q. And what is the predator reporting group?

23 A. It's, basically, the way that we would
24 contact the child safety team about grooming attempts.

25 Q. And was one of your roles as a moderator

1 to escalate sexual predators to this group?

2 MR. DRAKE: Objection; leading.

3 THE WITNESS: Yes.

4 BY MR. MURA:

5 Q. And next, you say:

6 "The account was banned, however despite
7 the user having saved many inappropriate videos of
8 children..."

9 Do you see that?

10 A. Yes.

11 Q. What did you mean by "inappropriate videos
12 of children"?

13 A. They appeared to be, if I am remembering
14 correctly, masturbation material under a blanket for
15 that one, I think.

16 Q. And then it says:

17 "... the user was not escalated to law
18 enforcement or any other group..."

19 Do you see that?

20 A. Yes.

21 Q. And then you write:

22 "In contrast to common practice..."

23 Do you see that?

24 A. Yes.

25 Q. Can you please explain what you meant by

1 that?

2 A. Yeah. From my understanding of how other
3 platforms deal with this kind of issue, at least
4 through my exposure with YouTube's child safety team,
5 they would report everything, including all comments
6 that someone would make and they would also, like,
7 report all of the videos when they did a NCMEC report,
8 so they would give all of the user data over to NCMEC
9 so then they could then pass it on to law enforcement.

10 Q. And what was TikTok and ByteDance's
11 practice?

12 MR. DRAKE: Object to form.

13 THE WITNESS: I don't know the
14 instructions that the team were given; however, I did
15 note that there was an incident where they said that
16 they did not report the content because it was past a
17 certain age. And this was also something that
18 I mentioned -- through these conversations with Yuyi,
19 Yuyi said that it's not something that ByteDance do,
20 to send off all of the comments to NCMEC.

21 MR. DRAKE: Motion to strike as
22 nonresponsive.

23 MR. MURA: I'll object.

24 BY MR. MURA:

25 Q. And then you go on to say:

1 "A few weeks ago, [REDACTED] routed a
2 suggestion of mine to another team in regards to the
3 visibility of the reporting button."

4 Do you see that?

5 A. Yes.

6 Q. What is the reporting button?

7 A. So in the app, the users have the ability
8 to flag content, which is to raise attention of it to
9 a moderator, and that is typically in relation to if
10 they think the content is violative or dangerous or
11 something like that.

12 So the reporting button was in the Sharing
13 menu options, and this was about -- basically,
14 I thought that it was counterintuitive to have an
15 option for flagging bad content in -- you know,
16 bundled in with options for sharing good content. It
17 seemed like it wouldn't be the easiest way for someone
18 to find it, and so the suggestion was to add it to the
19 top level of the user interface. But that didn't end
20 up happening.

21 But then an experiment was done where
22 the reporting option was moved to the left side of the
23 list in the sharing options and it resulted in, like,
24 39 percent -- I think it was 39 percent, yeah,
25 increase in reporting volume.

1 BY MR. MURA:

2 Q. So the next sentence, you wrote:

3 "The reporting button is currently within
4 the sharing options, which is unusual as sharing
5 content has positive connotations, rather than the
6 negative idea surrounding reporting something for
7 being abusive."

8 Do you see that?

9 A. Yes.

10 Q. And is that what you mean by the reporting
11 button was in an odd place?

12 A. Yes.

13 MR. DRAKE: Objection; leading.

14 BY MR. MURA:

15 Q. And that was because a normal user
16 would not want to hit Share when they saw
17 inappropriate content; is that right?

18 MR. DRAKE: Objection; leading.

19 THE WITNESS: I would believe that, yes,
20 because it's otherwise easier for them to just scroll
21 to a different video than to actually report it.

22 BY MR. MURA:

23 Q. And then you wrote:

24 "The reporting option was listed on the
25 far right of the sharing option which meant it had to

1 be scrolled to in order to be found."

2 Do you see that?

3 A. Yes.

4 Q. Can you please explain what the issue is
5 there?

6 A. Yeah. So if you did open the sharing
7 menu, you would see a number of interaction options,
8 for example, share to other apps, share to WhatsApp,
9 Twitter, wherever, or send through text message. But
10 because there are so many options, the user interface
11 can only fit so many buttons within the sub-menu, and
12 that meant that the reporting option being on the far
13 right, you had to swipe to the left to be able to get
14 the reporting button to even come into view on your
15 screen.

16 Q. So are you saying that even if a user
17 clicked on Share, the reporting option would be off
18 screen?

19 MR. DRAKE: Objection; leading.

20 THE WITNESS: If it were through the
21 sharing menu, yes.

22 BY MR. MURA:

23 Q. And so a user would have to know that
24 the option was there and scroll to it; is that right?

25 A. Yes.

1 CERTIFICATE OF COURT REPORTER

2
3 I, LEAH M. WILLERSDORF, Registered Merit
4 Reporter, Certified Realtime Reporter, Fellow of the
5 British Institute of Verbatim Reporters, Qualified
6 Realtime Reporter Level 2, and Certified LiveNote
7 Reporter, do hereby certify that:

8 ROSIE KING appeared before me on Tuesday,
9 April 29, 2025, was sworn by me and was thereupon
10 examined by counsel; that the testimony of said
11 witness was taken by me stenographically; that the
12 foregoing is a true and accurate record to the best of
13 my knowledge, skill and ability; that I am neither a
14 relative nor employee of any party to the action in
15 which this testimony was taken; that I am neither
16 relative nor employee of any attorney or counsel
17 employed by any party thereto; and, further, I am not
18 financially or otherwise interested in the outcome of
19 the action.

20
21
22
23 _____
24 LEAH M. WILLERSDORF
RMR, CRR, FBIVR, ACR, QRR2, CLR

25 (May 01, 2025)