

AMENDED Exhibit 522

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 2023 Q2 OKRs (Full)

0. Key metrics target

- a. DAU target:
 - i. Global: base version 964.0M (+39M, ↑4.2%), aggressive version 971.0M (+46M, ↑5.0%)
 - ii. US: base version 94.7M (+1.9M, ↑2.0%), aggressive version 95.0M (+2.2M, ↑2.4%)
- b. Revenue:
 - i. Ads revenue: Accelerate ads revenue to \$3,063M
 - ii. Live revenue: Achieve revenue: \$2.043B
 - iii. E-commerce GMV: Total GMV target is \$3.826B
- c. Creator & Safety:
 - i. TCOP: ██████████ T&S - ██████████, Feed Quality ██████████
 - ii. CGVR: Video CGVR ██████████ & LIVE remain at ██████████ with FVR within ██████████

1. Earn trust and reduce risks globally by identifying and addressing concerns raised by policymakers and other stakeholders

- a. (US) Project Texas: @ ██████████ @ ██████████
 - i. Deploy test version of Oracle Sandbox for mobile app
 - ii. Data Deletion Target (finalizing)
 - iii. Source and procure second source code reviewer
 - iv. Open Denver, CO Dedicated Transparency Center
 - v. Create USDS AUS and USDS UK legal entities
- b. Minor Safety: kick off 4 pillars including search/feed/perception/features and find 1-2 leading industry initiatives @ ██████████ @ ██████████ @ ██████████
- c. Project Sunlight: Develop framework for digital sovereignty initiatives worldwide @ ██████████ @ ██████████ @ ██████████ @ ██████████ @ ██████████
- d. Project Clover: meet key milestones @ ██████████ @ ██████████

EXHIBIT

3

TIKTOK-GROVER 2/27/25

- Drive towards completion of Phase 1 Engineering Plan - by end of June, ringfence US GCP datacenter, so that no new EEA/UK protected user data will be transferred to RoW.
 - Engage and announce Trusted European Technology Partner
 - Drive towards completion of Short-Term Measures
 - Complete business justification review for all departments and revoke non-necessary access
- e. Privacy compliance: @ [REDACTED] @ [REDACTED] @ [REDACTED]
- i. Privacy Program: Legal finish Privacy Control Framework design for TikTok; PDPO/PnS finish P0 technical specifications draft; P0 framework and privacy program implementation rate [REDACTED] + mainly focusing on purpose limitation and data minimization
 - ii. Transparency: launch Commercial Content Library; work with XFN on mythbusting data collection including publishing 1-2 technical whitepapers
 - iii. Product Privacy: continue Age improvements; launch personalization controls over highest-priority recommender systems, as required by upcoming EU DSA law
- f. [Project Core 2.0] Rollout High Profile Public Interest Accounts (HPPIA) development for Tier 1 Decision
- Assurance accounts. Execute recommendations on Political Ads & enhance toxicity management efforts @Cormac Keenan @V Pappas @ [REDACTED] @Michael Beckerman @ [REDACTED]

2. Earn trust through proactive engagement with stakeholders

- a. Execute Key PA Deliverables @Michael Beckerman @ [REDACTED] @ [REDACTED] @ [REDACTED]
- i. Identify and finalize agreements with [x] new civil society groups on key policy issues of interest and relevance in the Americas. @Michael Beckerman
 - ii. Engage with the European Commission (and others) to lift bans on officials' devices, and prevent further bans. De-escalate threats in NO, SE, DK, and NL, and strengthen relationships in UK, FR, DE, IT. @ [REDACTED]
 - iii. Deepen trust with the PM, Attorney General, and Communications Minister in AU; address ban threats in 5 METAP markets and visit 9 METAPSA markets; engage with [x] senior ministries in ID and MY. @ [REDACTED]
 - iv. Attend Astana Forum in KZ (aka Central Asian Davos) to consolidate TT's position as an industry partner of choice in the region. @ [REDACTED]
- b. Content Assurance @V Pappas @ [REDACTED] @ [REDACTED]
- Rollout and ensure compliance to Content Promo Lever policy for all promo tools globally @ [REDACTED]

- Roll out Editorial Guidelines in alignment with XFN stakeholders - @ [REDACTED]
- c. Trust Initiatives @ [REDACTED] @ [REDACTED] @V Pappas
 - i. Identify key publishers / partnerships and develop a plan to make 2-3 key allies for us, in addition to developing a broader approach for building trusted partnerships @ [REDACTED] @ [REDACTED] @ [REDACTED]
 - ii. Developing corporate and consumer campaigns to launch in Q2 to increase trust and positive sentiment for the platform and the brand @ [REDACTED]
 - iii. Develop and rollout US consumer ladder of engagement and creator engagement strategy in alignment with GR strategy, including rollout of inaugural Creator Summit ("TikTok Townhall") @ [REDACTED] @ [REDACTED] @ [REDACTED]
 - iv. Evaluate operations of STEM Feed and potential market roll-out - @ [REDACTED] @ [REDACTED]
 - v. Develop a strategic approach to IP management and media rightsholders (e.g., A17) - @ [REDACTED] @ [REDACTED] @ [REDACTED]

3. **Stay competitive, sharpen content strategy, and improve DAU** @ [REDACTED] @ [REDACTED] @V Pappas

a. **Content Diversification**

- i. Improve longer videos: [REDACTED] DAU global impact x->y, US x->y; US ST impact x->y @ [REDACTED] @ [REDACTED]
 - * Consumption @ [REDACTED] @ [REDACTED]
 - Strengthen informative content and content diversification
 - Optimize original definition of feed quality and derivative content percentage
 - * Creation @ [REDACTED] @ [REDACTED]
 - Improve recommendable post rate: [REDACTED]
 - CF 2.0: US [REDACTED]; EU4 plans confirmed; [REDACTED]
DAU impact FR [REDACTED], BR [REDACTED]
 - 1min+ publish rate [REDACTED]; editpro/web/capcut tool DAU x->y
- ii. Develop strategic proposals/business models for Publisher Monetization - [REDACTED]
- iii. Pivot to 1min+ content growth by batch onboarding creators from competitor platforms in EU5, BR, SEA - [REDACTED]

- iv. Improve publisher active rate in all PGC taskforce markets while continue onboarding publishers in SPLA, NEA and METAPSA - @ [REDACTED] @ [REDACTED] @ [REDACTED] @ [REDACTED]
- b. **Improve content quality & product safety** @ [REDACTED] @Sandeep Grover@ [REDACTED]
 - i. ANSA: Global minor user unapproved vv% 0.3% -> 0.25%, non-login users ANSA unapproved 0.2%->0.15%; reduce overkills, and hence reduce the stayduration loss by 0.2% @ [REDACTED] @ [REDACTED]
 - ii. Indicators: align w/ TnS on key metrics and goal, esp. for US @ [REDACTED] @Sandeep Grover
 - iii. Data: build up penalty one-stop data platform @ [REDACTED]
- c. **Grow DAU and monitor closely on main competitors** [REDACTED]
 - i. Developed markets: Japan: coin version successfully launched, DAU [REDACTED] US: paid DNU [REDACTED] ramp up for [REDACTED]
 - ii. Emerging markets: start new cannibalization experiments and confirm new bidding price
- d. **Improve UGC publish and enhance social** @ [REDACTED] @ [REDACTED] @ [REDACTED]
 - i. Publish rate [REDACTED], recover the publish rate and set up redline xx% @ [REDACTED]
 - ii. Privacy settings optimization x->y @ [REDACTED]
 - iii. Expand external designers ecosystem, weekly published designers [REDACTED] @ [REDACTED]
 - iv. Optimize publish model for the effect target and optimize the cold start, effect pub % +x% [REDACTED]
 - v. Social penetration rate [REDACTED] (non-DM), pic/text publish [REDACTED] and vv [REDACTED] @ [REDACTED]
- e. **Creator monetization: TCMS and paid content product strategy clarification**@ [REDACTED] @ [REDACTED]
 - i. Paid content: pilot daily GMV [REDACTED] Add paid content conversion model, enhance creators' promotion usage penetration, Rollout from 11 markets to 108 markets.
 - ii. TCMS: GMV [REDACTED] clarify for 3 key pillar strategies - higher cost-efficiency for advertiser, better marketplace and close-loop
- f. **Ops+Mkt Initiatives** @V Pappas
 - i. [HYPERLINK [REDACTED] build out a/b testing for [HYPERLINK [REDACTED] and roll out standardized testing to all global tentpoles in order to develop benchmarks for

promo levers' and tentpoles' impact on core metrics [REDACTED]
[REDACTED]

- ii. Develop and execute global vertical tentpoles (eg NBA Finals, Cannes FF, Gaming Month), as well as community-led initiatives (e.g., Pride) [REDACTED]
[REDACTED]
- iii. Project Clover: GUO to work with Clover engineering taskforce to complete the redesign of EU data interchanges in order to be compliant with EU data privacy and sovereignty, while ensuring global business continuity [REDACTED]
- iv. Marketing measurement framework: Complete framework, setup a roadmap of campaigns required to improve accuracy in key markets to start testing [REDACTED]
[REDACTED]
- v. L4/5 Perception Shift: plan & launch campaigns in US, DE [REDACTED]
- vi. **Distribution:** Telco: AT&T, Telefonica, America Movil, Motorola, Deutsche Telekom, Telenor; **Product:** Quora, Match, Reddit, Book Publishers; **New Screens:** Ford, GasStationTV, Octopus (T-Mobile), Jukin, Digital Cinema, Screen Vision; **CSR:** Percent donation [REDACTED]

4. **Strengthen safety to build trust @Cormac Keenan**

- a. **[Creator safety metrics]** Significantly reduce SV overkill issues, Video TCOP (ROW) [REDACTED] TCOR [REDACTED] & Live reduce Interrupt TCOR from [REDACTED] and NR TCOR from [REDACTED] finalize account overkill metrics across all creator tiers: HPPPIA, Publishers, Top Creators with clear 2023 goals and roadmap. @Sandeep Grover@ [REDACTED]
- b. **[Fix moderation accuracy]** Finalize the moderation accuracy project scope (Project Uno), with clear RACI and roadmaps published for each workstream. Reduce experimental country TCOR and CGVR significantly. Achieve [REDACTED] consistency for GT markets (MX) @Sandeep Grover@ [REDACTED] @Julie de Baillencourt@ [REDACTED]
- c. In support of Project Forward, align on 2-3 initiatives designed to show TikTok's industry leading capability at ensuring safety of our users with at least one, primarily focused on Teens. @ [REDACTED] @Michael Beckerman@ [REDACTED]
[REDACTED] @Sandeep Grover
- d. Create a proposal for a content audit committee with the goal of publishing third party audits of our content ecosystem. @Julie de Baillencourt@Sandeep Grover
- e. Create a comprehensive transparency strategy for researchers with at least one publication of research developed through our API provisions. @ [REDACTED]

5. **Build a Sustainable Business with Strong Revenue Growth**

- a. Ads: Accelerate ads revenue to \$3,063M @Blake Chandlee
 - i. TT ARPU: achieve TT ARPU of \$0.038 through Q2

- ii. SMB: maintain revenue at \$614M
- iii. Business sustainability: Maintain a healthy balance of Branding/Performance revenue at 38/62 in Q2

b. **LIVE: optimize safety and enhance operation** @Adam Wang

- Revenue [REDACTED], paid rate **%
- Usage: DAU LIVE watch time ** min, penetration [REDACTED]
- Safety & platform responsibility: launch monetization integrity review; finalize global payment compliance solution; align the positive PR proposal
- Operation: enhance US operation through task-force; enable agency business with proper legal setup, diverse incentive structures, and business model overview.

c. **E-commerce** @ [REDACTED]

- i. GMV: Total GMV target for 2023 Q2 is [REDACTED] with [REDACTED] from SEA, [REDACTED] from UK, [REDACTED] from US, and [REDACTED] from Saudi Arabia
- ii. US Cross-border Project: Deliver PRD review, legal review, and technical plan review and target to launch in August
- iii. US Co-moderation: Deliver and align on GNE-TnS-MI moderation standards, process and responsibilities, and reduce merchant overkill rate by [REDACTED]
- iv. Discuss and align with Legal team about legal review efficiency, ensuring resources and speed up PRD review

6. **Strengthen organization** @ [REDACTED] @ [REDACTED] @ [REDACTED] @ [REDACTED]

a. **Strengthen organizational efficiency and complete annual performance communication**

- i. 100% deliver performance communication with high quality by April.
- ii. Drive organizational change projects with execution excellence, on time and in coordination with Internal comms/Global comms: for example, Project Clover.

b. **Strengthen culture and address employee sentiment issues**

- i. Improve RTO ratio to min 2 days/ week for each department.

DOCUMENT METADATA

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