

AMENDED Exhibit 531

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

Cormac Keenan

1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA)
ADOLESCENT ADDICTION/PERSONAL)
INJURY PRODUCTS LIABILITY) MDL No. 3047
LITIGATION)
_____)
THIS DOCUMENT RELATES TO:)
ALL ACTIONS)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
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:
ALL ACTIONS) Carolyn B.
Kuhl, Dept.12

MONDAY, MARCH 24, 2025

CONFIDENTIAL - ATTORNEYS' EYES ONLY -
PURSUANT TO PROTECTIVE ORDER
CONTAINS REDACTED PORTION

☒ ☒ ☒

Videotaped deposition of Cormac Keenan, held at the location of the witness in Dublin, Ireland, commencing at 9:25 a.m. Greenwich Mean Time, on the above date, before Carrie A. Campbell, Registered Diplomate Reporter, Certified Realtime Reporter, Illinois, California & Texas Certified Shorthand Reporter, Missouri, Kansas, Louisiana & New Jersey Certified Court Reporter.

☒ ☒ ☒

1 A. No.

2 Q. Have you talked to anybody from
3 TikTok who's been deposed?

4 A. No.

5 (Keenan Exhibits 2 and 3 marked
6 for identification.)

7 QUESTIONS BY MR. VERRIER:

8 Q. Okay. I'm going to hand you
9 two documents. We're going to mark these as
10 Exhibits 1 and 2 -- I'm sorry, 2 and 3.

11 So Tab 2 will be marked as
12 Exhibit 2.

13 Tab 3 is -- we've marked as
14 Exhibit 3.

15 Okay. So turning your
16 attention to the document that we had marked
17 as Exhibit 2, is that your résumé?

18 A. It is, yes.

19 Q. And you recognize that
20 document?

21 A. I do.

22 Q. Does it accurately lay out your
23 work history?

24 A. Yes, it does.

25 Q. If I could turn your attention

1 to the professional summary at the top.

2 A. Yeah.

3 Q. It says that you have extensive
4 experience in trust and safety.

5 Is that accurate?

6 A. I believe so, yeah.

7 Q. And below that, you list your
8 experience working for TikTok and ByteDance.

9 Is that right?

10 A. Correct.

11 Q. And originally you began at
12 TikTok in February 2020?

13 A. Yeah.

14 Q. And you were the head of trust
15 and safety for the EMEA?

16 A. Correct.

17 Q. And is that the Europe, Middle
18 East and Africa region?

19 A. Absolutely, yeah.

20 Q. And after -- well, come
21 November of 2020, you were elevated to the
22 head of global trust and safety.

23 Is that right?

24 A. That's correct. Yeah.

25 Q. And TikTok/ByteDance is a

1 global company.

2 Right?

3 A. Yeah.

4 Q. And they -- you originally had
5 authority over the EMEA region.

6 Were there other regions also?

7 MR. DRAKE: Object to form.

8 THE WITNESS: At that stage --
9 so I joined TikTok in, as it says
10 here, early February, February 3rd, to
11 be precise. At that point my -- my
12 role was essentially to build out the
13 trust and safety functions that were
14 supporting the European, Middle East
15 and Africa region out of Dublin.

16 So at that point, my only remit
17 was to support users and to build the
18 team supporting those users in the
19 EMEA region.

20 QUESTIONS BY MR. VERRIER:

21 Q. Were there -- did TikTok have
22 other regions that were in operation that
23 other employees were building out the trust
24 and safety operations for?

25 A. Yeah. So I had a number of

1 counterparts. There was [REDACTED]
2 [REDACTED] who was based in Mountain View,
3 building out the support for the --
4 essentially the Latin American region.

5 I had a colleague, [REDACTED] who
6 was in Singapore, essentially doing the same
7 thing for the APEC region.

8 And then we -- from the day
9 that I started, we had a separate
10 organizational structure for the US. So the
11 US was under the remit of Eric Han in a team
12 referred to as US Safety. They reported up
13 into a different part of the organizations.
14 They reported up in to V Pappas and had
15 responsibility for the US.

16 So I had direct -- my direct
17 peers were [REDACTED] and then Eric
18 working in the US, but they were more
19 independent.

20 Q. And in November of 2020, you
21 became the head of global trust and safety.

22 Is that right?

23 A. That's correct. Yeah.

24 Q. And in that role, you were
25 responsible for the global trust and safety

1 function?

2 A. I was. So my role encompassed
3 at that stage the aforementioned regions,
4 APEC and Latin America.

5 I also folded in as part of my
6 new role responsibility for functions --
7 other functions that were in the global team.
8 So they included our operations team, and its
9 role is to build and manage the content
10 moderation efforts.

11 The policy team, product policy
12 team, which builds and publishes and manages
13 our content policies, and they're published
14 externally under the community guidelines.

15 And there were other teams,
16 like strategy and operations, but the US
17 remained separate. So the US was something
18 that never directly reported up in to me.
19 That was a separate organization.

20 Q. Okay. And so prior to working
21 at TikTok/ByteDance, you worked at Facebook,
22 now Meta, for close to ten years.

23 Is that right?

24 A. Correct.

25 Q. And before that, you worked at

1 Google here in Dublin for a little over seven
2 years as well.

3 Is that right?

4 A. That's correct.

5 Q. The second document I handed
6 you that -- it's labeled Exhibit 3, this is a
7 document that's titled "Amended Human
8 Resources Information" -- or "Second Amended
9 Human Resources Information."

10 Is that accurate?

11 A. Yeah, that's correct.

12 Q. And looking quickly at this,
13 does this seem like an accurate reflection of
14 your experience at -- at TikTok?

15 A. It does except for the -- under
16 the first bullet under Departments, that may
17 be an administrative function from an
18 onboarding perspective. But obviously -- I'm
19 sorry, that's incorrect. My apologies.

20 Yeah, this all looks correct,
21 yes.

22 Q. Okay.

23 A. I misread the date.

24 Q. Now, you stopped being a TikTok
25 employee in March of 2024.

1 Is that right?

2 A. Correct.

3 Q. But you went on to join the
4 board of directors?

5 A. I've been a member of the board
6 probably since -- I don't remember the exact
7 date, but a couple of years in my tenure I
8 was already on the board. So when I made the
9 decision to leave, it was discussed whether I
10 could or can continue in that role.

11 So I have been an independent,
12 nonexecutive director on the TikTok
13 Technology Limited board since that point.

14 Q. So that would be since some
15 point prior to -- oh, you've been an
16 independent director --

17 A. Yes, exactly.

18 Q. Yeah, okay.

19 Prior to that time, sometime
20 after, I guess, November of 2020, you became
21 a member of the board --

22 A. Yeah, I can't remember exactly
23 the date, but I think it would have been in
24 my first year.

25 Q. Okay. So sometime between 2020

1 and early 2021, you think?

2 A. Yeah, that would be --

3 Q. Okay.

4 A. -- reasonably accurate.

5 (Keenan Exhibit 4 marked for
6 identification.)

7 QUESTIONS BY MR. VERRIER:

8 Q. I'm going to mark another
9 document here, Exhibit 4. This is Tab 4.

10 So I've handed you a document
11 that is Bates-stamped -- bears the Bates
12 stamp on page 1 of TIKTOK3047MDL-239-
13 04865103.

14 Do you see that on the bottom
15 right-hand corner, page 1?

16 A. Yes, I do.

17 Q. And this is a -- a letter of
18 appointment dated April 3, 2024?

19 A. Correct.

20 Q. Do you recognize this document?

21 A. I do.

22 Q. If I turn your attention to the
23 last page -- well, the last two pages are a
24 legal, technical metadata, but three pages in
25 it bears the Bates number at the bottom 5111.

1 don't think that we did.

2 (Keenan Exhibit 19 marked for
3 identification.)

4 QUESTIONS BY MR. VERRIER:

5 Q. That's Exhibit 19.

6 Mr. Keenan, I've handed you a
7 document. It's a Lark chat. The first page
8 bears the Bates number ending in 0824.

9 Do you see that?

10 A. I do, yes.

11 Q. And it's titled "P&C WSJ
12 articles on TikTok algorithm."

13 Did I read that correctly?

14 A. Yes, you did.

15 Q. What does the P&C stand for?

16 A. Protected -- protected and
17 confidential? Protected and
18 client-privileged? I think it could be
19 interpreted different ways.

20 Q. And WSJ means Wall Street
21 Journal, I assume?

22 A. Correct, yeah.

23 Q. So this is a Lark chat between
24 you and others, including TikTok CEO Shou
25 Chew.

1 Is that right?

2 A. That would appear so, yes.

3 Q. And it begins in -- on
4 December 7, 2021?

5 A. Correct.

6 Q. And the first message in the
7 chat is from Mr. Chew.

8 Do you see that?

9 A. I do.

10 Q. And he says, "I think we have
11 our new community guidelines coming out soon.
12 The new community guidelines talk about
13 eating disorders as well. May want to sync
14 up on timing of that."

15 Did I read that correctly?

16 A. Yes, you did.

17 Q. And if we move down to the
18 bottom of the page, there's a message from
19 [REDACTED] ?

20 A. Yeah.

21 Q. Who is [REDACTED] ?

22 A. She was also a member of the
23 communications team.

24 Q. Communications.

25 And she says, "A few updates.

1 This is not going to be a good story."

2 Did I read that correctly?

3 A. Yes, you did.

4 Q. "Unlike The Wall Street
5 Journal's previous bot-focused piece, these
6 findings are interspersed with stories of
7 teen girls sucked into eating
8 disorder/dieting rabbit holes who attest that
9 the content accelerated their descent,
10 triggered an eating disorder or triggered a
11 relapse."

12 Did I read that correctly?

13 A. Yes, you did.

14 Q. And then if I turn your
15 attention to the last message on that page,
16 the last bullet point, [REDACTED] writes,
17 "We prodded on whether these teens
18 experienced similar paths on other
19 platforms...the take is that the eating
20 disorder content is inescapable on TikTok,
21 because they didn't proactively seek it out."

22 Did I read that correctly?

23 A. Yes, you did.

24 Q. Now, this message goes to the
25 top of the next page where it has additional

1 Q. And it says, "New user
2 activation is the process of taking a new
3 user from opening the TikTok app to
4 establishing a habit around the core value
5 prop."

6 Do you see that?

7 A. I do, yes.

8 Q. Do you understand that to be
9 core value proposition?

10 A. That's how I would interpret
11 it, yes.

12 Q. Okay. It also says, "An
13 activated new user has to form a habit of
14 coming to TikTok on a regular basis."

15 Do you see that?

16 A. I do see that, yes.

17 Q. And that's in bold?

18 A. Correct.

19 (Keenan Exhibit 24 marked for
20 identification.)

21 QUESTIONS BY MS. CRAICK:

22 Q. Okay. We can set this aside.

23 Then let's pull up FC4. This
24 is Exhibit 24. Take a look through it. Let
25 me know when you're ready.

1 Okay?

2 A. Sure.

3 Okay.

4 Q. And this is a Lark chat titled
5 "Adult nudity and sexual" --

6 What's the A?

7 A. Activity.

8 Q. -- "activity, trust and safety
9 alignment channel."

10 A. Correct, yes.

11 Q. Okay. And the first message is
12 from [REDACTED] and she is tagging you.

13 Do you see that?

14 A. I do, yes.

15 Q. And this is from March 2021.
16 Right?

17 A. Correct, yeah.

18 Q. Okay. And what was [REDACTED]
19 [REDACTED] role?

20 A. I don't recall specifically.

21 Q. Okay. Was she on your team?

22 A. If she would have -- if she was
23 in this group, she was in trust and safety.
24 So, yeah, she was in trust and safety in
25 some -- some role. I'm not sure exactly what

1 her role was.

2 Q. Okay. And you can also see
3 you're participating in this Lark chat?

4 A. Yeah.

5 Q. And you're participating in the
6 regular course of your job at TikTok.

7 Right?

8 A. Yes.

9 Q. And you have no reason to
10 believe the chat was altered in any way from
11 how it existed in your files?

12 A. I do not.

13 Q. Okay. So if we go to page 4,
14 which is ending in 0456, at the very bottom
15 of the page there's a start of a message from

16 

17 A. Yeah.

18 Q. And they're forwarding a chain
19 of messages that continues onto page 5, Bates
20 ending 0457.

21 Do you see that?

22 A. I do.

23 Q. Okay. And at the bottom of the
24 forwarded messages, one of the messages says,
25 "I don't think the TikTok recommendation

1 system is suitable for abuse detection."

2 Do you see that?

3 A. I do.

4 Q. "The main goal of TikTok rec
5 sys" --

6 Is that recommendation system?

7 A. I'm not entirely sure, but I
8 think that's a good hypothesis.

9 Q. Okay. "The main goal of
10 TikTok's recommendation system is to improve
11 user retention and stay duration."

12 Do you see that?

13 A. I do.

14 Q. Is it your understanding that
15 the recommendation system is sometimes
16 referred to as the algorithm?

17 A. Yeah, they're used
18 interspersed.

19 Q. Okay. And that's one of the
20 main things that powers the For You page that
21 a user sees when they're scrolling through
22 videos on TikTok.

23 Right?

24 A. Correct, yes.

25 Q. Okay. And user retention, as

1 CERTIFICATE

2 I, CARRIE A. CAMPBELL, Registered
3 Diplomate Reporter, Certified Realtime
4 Reporter and Certified Shorthand Reporter, do
5 hereby certify that prior to the commencement
6 of the examination, Cormac Keenan, was duly
7 sworn by me to testify to the truth, the
8 whole truth and nothing but the truth.

9 I DO FURTHER CERTIFY that the
10 foregoing is a verbatim transcript of the
11 testimony as taken stenographically by and
12 before me at the time, place and on the date
13 hereinbefore set forth, to the best of my
14 ability.

15 I DO FURTHER CERTIFY that I am
16 neither a relative nor employee nor attorney
17 nor counsel of any of the parties to this
18 action, and that I am neither a relative nor
19 employee of such attorney or counsel, and
20 that I am not financially interested in the
21 action.

22 <%31964,Signature%>

23 CARRIE A. CAMPBELL,
24 NCRA Registered Diplomate Reporter
25 Certified Realtime Reporter
California Certified Shorthand
Reporter #13921
Missouri Certified Court Reporter #859
Illinois Certified Shorthand Reporter
#084-004229
Texas Certified Shorthand Reporter #9328
Kansas Certified Court Reporter #1715
New Jersey Certified Court Reporter
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Louisiana Certified Court Reporter
#2021012
Notary Public
Dated: April 14, 2025