

AMENDED Exhibit 537

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

[External] Digital Wellbeing Product Strategy

What is Digital Wellbeing?

TikTok-Furlong

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4/11/2025 - MOP

TikTok Mission	Inspire creativity and bring joy
DW Vision	TikTok sets an industry-leading standard for promoting users' safety, agency, and belonging.
DW Definition	Wellness is an active process through which people become aware of, and make choices toward, a more *successful existence. ([HYPERLINK "https://nationalwellness.org/resources/six-dimensions-of-wellness/" \h])
DW Dimensions	Physical, Intellectual, Social, Mental, Occupational, Emotional ([HYPERLINK "https://nationalwellness.org/resources/six-dimensions-of-wellness/" \h])
DW Social Layers	1. Individual = mental wellness (focus of this document) 2. Relational = how we interact with the world around us 3. Collective = health of communities and societies
DW Hierarchy	1. Safety = safety by design; recognizing harms and maintaining safety (core T&S responsibility, <i>mostly</i> addressed by other T&S teams) 2. Agency = the capacity of individuals to act independently and to make their own free choices (focus of this document) 3. Belonging = facilitate meaningful interactions and relationships between TikTok users (long term goal)

(See Defining section [HYPERLINK

for more context)

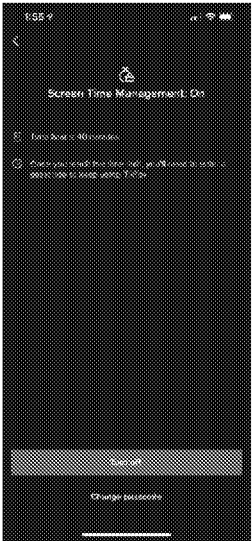
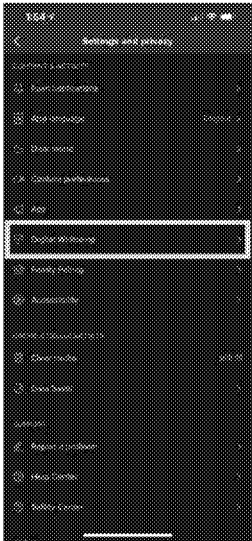
What does Digital Wellbeing currently look like?

We have built some important foundational features, but there is a lot of room for them to grow. We are also behind our competitors in terms of standard functionality (Appendix A).

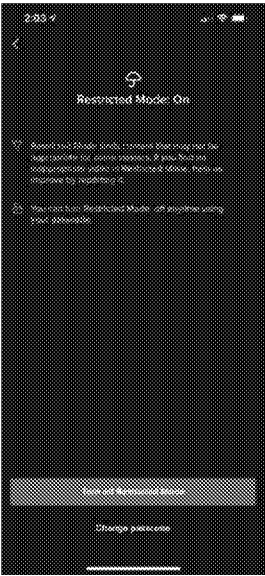
Feature

Screen Time Management

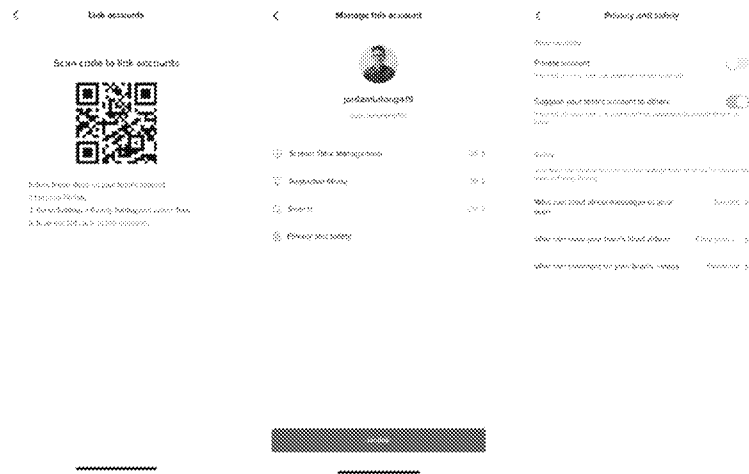
Key Screens



Restricted Mode



Family Pairing



Take a Break Videos

1 of [HYPERLINK

live globally:

[tiktok]([HYPERLINK

])

(See [HYPERLINK
[h] for more details)

1. User Problems

1.1 Compulsive Usage and Lack of Agency

We have learned from [HYPERLINK

[REDACTED] that our users' biggest usage deterrent is that they think the platform is addictive. We also see many app store reviews that echo the following sentiment, "Do not download this app unless you're able to spent at least two hours a day on it. It's addicting!" (Appendix D).

This issue is further supported by external research and reveals other more concerning effects as well. According to a study of 1600 8-18 year olds, 8-12 year olds use almost 5 hours of entertainment screen media per day and teens use just over 7 hours per day, with 62% over 4 hours and 29% over 8 hours ([HYPERLINK "https://www.common sense media.org/sites/default/files/uploads/research/census_researchreport.pdf" \h]). This compulsive usage correlates with a slew of negative mental effects like loss of analytical skills, memory formation, contextual thinking, conversational depth, empathy, and

increased anxiety ([HYPERLINK "https://www.pewresearch.org/internet/2018/04/17/the-future-of-well-being-in-a-tech-saturated-world/" \h]). Various similar studies to Pew's also conclude that compulsive usage interferes with essential personal responsibilities like sufficient sleep, work/school responsibilities, and connecting with loved ones ([HYPERLINK "https://europepmc.org/article/PMC/5380441" \h]).

In sum, compulsive usage on TikTok is rampant and our users need better tools to understand their usage, manage it effectively, and ensure being on TikTok is time well spent ([HYPERLINK [REDACTED]]).

Action Plan: See [HYPERLINK [REDACTED]]

section

1.2 Minor Safety and Parental Concerns

User safety is at the [HYPERLINK [REDACTED]]

[REDACTED] of wellbeing and this is a core responsibility of the broader TnS organization, yet there are still important opportunities that this initiative is obligated to invest in. A recently conducted [HYPERLINK [REDACTED]] and follow on [HYPERLINK [REDACTED]]

has provided clear improvements that takes into account different key markets ([HYPERLINK [REDACTED]], [HYPERLINK "https://www.ofcom.org.uk/__data/assets/pdf_file/0025/217825/children-and-parents-media-use-and-attitudes-report-2020-21.pdf" \h]):

Problem Area	Solution
<u>Content</u> : Respondents' primary concerns about TikTok centered on its content.	- Restricted Mode (enhancements planned) [HYPERLINK [REDACTED]] (in progress)
<u>Data Privacy</u> : Many respondents were also concerned about the safety of their teens' personal information.	- Family Pairing (enhancements planned) - Privacy by Default:[TikTok_Privacy & Safety Under 18.pdf]

<u>Wellbeing</u>: Many respondents were concerned that TikTok negatively affected their teens' well-being.	* Screen Time Management (enhancements planned) * Various new feature ideas (to be tested)
<u>Awareness</u>: Parents have insufficient knowledge of existing protections	* Improve feature visibility in product experience * Work with MKT/PR/Comms to spread awareness

Action Plan: See [HYPERLINK

section

1.3 Lack of Meaningful Connections

Harvard's almost 80 year old [HYPERLINK

"https://news.harvard.edu/gazette/story/2017/04/over-nearly-80-years-harvard-study-has-been-showing-how-to-live-a-healthy-and-happy-life/" \h] is one of the world's longest studies of adult life and reports that strong relationships is one of the most important indicators of health and happiness. With our mission of "inspire creativity and bring joy" in mind, it should be an utmost priority for us to facilitate strong relationships as a way to "bring joy" to our users.

While there are plenty of opportunities for TikTok to invest more in industry-standard social features, we should not do this and must consider a new approach given the negative outcomes of first-generation social media companies:

- * "Evidence from past literature has [HYPERLINK "https://journals.sagepub.com/doi/full/10.1177/1745691617713052" \h]. This may be because online spaces are often oriented to [HYPERLINK "https://www.sciencedirect.com/science/article/pii/S0747563219303073" \h] (such as by posting only "happy" content and likes), and frowning on expressions of loneliness." - [HYPERLINK "https://www.uow.edu.au/media/2020/does-social-media-make-us-more-or-less-lonely-depends-on-how-you-use-it.php" \h]

- o https://mitch.web.unc.edu/wp-content/uploads/sites/4922/2020/04/4_30_2020_Future-Dir.pdf

- * "It is ironic, but perhaps not surprising, that reducing social media, which promised to help us connect with others, actually helps people feel less lonely and depressed." - [HYPERLINK "https://penntoday.upenn.edu/news/social-media-use-increases-depression-and-loneliness" \h]

TikTok should provide enriching social experiences that are essential for people to feel heard, accepted, and to improve their wellbeing.

Related Internal Resources

- * [HYPERLINK ██████████]

- * [HYPERLINK ██████████]

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Action Plan: Lower priority and continue research for longer term roadmap in order to better understand user needs and product gaps. This fits squarely into our subsequent [HYPERLINK ██████████]

██████████ of relational and collective wellbeing.

Strengths / Opportunities

- * TikTok is a place to be your authentic self, and is content, rather than network-driven. This may mean that the risk of usage increasing feelings of envy may be lower than for some other platforms

- * Many people find joy in the TikTok experience, which is a powerful unique aspect of our platform that we should work hard to preserve

- * Higher levels of active engagement than many other platforms (e.g. as measured by post and comment rates), which is positive given research that suggests passive use of social media is more harmful

- "On TikTok in Q2, mega influencers had an average Engagement Rate of 11.83%—vs. 0.35% on Instagram, 2.75% on YouTube, 0.01% on Facebook and 0.01% on Twitter" - [HYPERLINK "https://adage.com/article/datacenter/tiktoks-astronomically-high-engagement-revealed/2361161" \h]

◦ [HYPERLINK

- We have a relatively blank canvas and more information than our industry did as a second generation tech company, positioning us well to roll out more effective resources and experiences
- Strong executive support

Weaknesses / Risks

- TikTok's success can largely be attributed to strong out of the box personalization and automation, which limits user agency
- TikTok is particularly popular with younger users, who are particularly sensitive to reinforcement in the form of social reward and have minimal ability to self-regulate effectively

Guiding Principles

- **High Impact** - Optimizations and small features will likely not give our users the help they need. We should gather necessary data and validation, then leverage that for bold investments that raise the bar for our industry
- **Usage Quality vs. Quantity** - This is more-so an effort to improve the transaction value between TikTok and our users instead of just reducing screen time. Not all usage is created equal
- **Data Informed, not Directed** - We are solving for complex multi-disciplinary (psychological, social, technical) problems that likely won't have concise and comprehensive success metrics
- **User Empowerment** - Agency and belonging are carefully selected goals for this initiative as they are at the essence of the type of community we want to foster on TikTok
- **One Size Fits Some** - One size fits all approaches are bound to fail given they rely on a simple approach to a complex set of challenges for a very diverse user base

Who are we improving Digital Wellbeing for?

First and foremost, we are building solutions for all users as we believe there are generic use cases associated with the user problems above. That said, we will stay true to our principle of One Size Fits Some and pay special attention to the specific needs of:

1. Adolescents (L1+2) - They more easily persuaded, there is a large population of them on TikTok (~30% DAU), and they likely don't understand risks of unhealthy usage as well as older users
 2. Parents - We conducted a [HYPERLINK [REDACTED]] of US parents where we found that 46% (613) of parents were concerned with their kids' TikTok usage, indicating a strong need to provide them more support
 3. Creators - They are the lifeblood of the TikTok experience and are a very highly leveraged group to support in that their advocacy can ripple throughout the user base
 - a. [HYPERLINK [REDACTED]]
 - b. [HYPERLINK [REDACTED]]
 - c. [HYPERLINK [REDACTED]]
 - d. [HYPERLINK [REDACTED]]
- (see [HYPERLINK [REDACTED]] [REDACTED] for user demographics breakdown)

Execution

Goals & Metrics - WIP

Prioritization Inputs

- * **Reach:** How many potential users would be able to use this feature?
- * **Impact:** How much value can we deliver for our target users and product lines?
- * **Confidence:** What industry, market, and other data signals can we use to increase confidence?
- * **Effort:** How quickly can we test the hypotheses?

[9-10] Minor Safety, Fix Existing Features, Metric Definition

Our current digital wellbeing offering is still at an immature stage with numerous P0 bugs and UX issues. Without a good faith effort in these foundational features, it is difficult for us to collect meaningful feedback on how to approach these subsequent, more complex phases.

Sources

- * [HYPERLINK
- * [HYPERLINK
- * [HYPERLINK
- * [HYPERLINK
- * [HYPERLINK

[11-12] Compulsive Usage and Lack of Agency, Minor Safety

Intervene in cases of abusive usage, provide usage transparency, and enable users to tailor their TikTok experience to what they think is valuable. The end goal is a more empowered user base that feels confident TikTok is always time well spent for them.

Sources: [HYPERLINK

[1-2] Compulsive Usage and Lack of Agency, Minor Safety

Continuation of the 11-12 bimonth.

Sources: [HYPERLINK

Backlog

Ideas that need additional refinement and/or research in order to commit to actually working on them.

Resources Needed to Accelerate Progress

Challenge	Additional Resource Ask	Priority
Feature release pace, given the aggressive goals in this proposal	1-2 PMs	P0
Not enough DA bandwidth to support this project	1 DA (could potentially utilize the RI DA hire) - coordinating with [REDACTED]	P0
UX bandwidth is limited as they are spread across many different projects	1 UX Designer - coordinating with [REDACTED] 1 UX Writer - coordinating with [REDACTED]	P0
We have a crude non-medical understanding of how technology negatively affects mental health	Phase 2 engagement with clinical experts. Options * [HYPERLINK "https://digitalwellnesslab.org/about/" \h] - already in contract with them, will likely do this * [HYPERLINK "https://www.stanfordbrainstorm.com/" \h] - phase 1 engagement complete, phase 2 on hold	P0
We don't have clear policies around screen time, agency, social connection, etc.	1 Policy lead - to discuss with [REDACTED]	P1
Engineering is extremely busy with various requirements already, so there is not much bandwidth for all the features we plan to build	TBD once we ramp up feature development	P1

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Appendix

[HYPERLINK

Appendix A: Competitor Landscape

Key Takeaways

- * There is a common but inconsistent set of features across other large competitors, indicating a lack of creativity and authentic investment. This should be a helpful input for us, but we should be brutally honest in prioritizing what features will drive the most impact for our users
 - "Contemporary digital wellbeing apps are **mainly focused on supporting self-monitoring**, i.e., tracking user's behavior and receiving feedback, but are not grounded in habit formation nor social support literature. Habit formation, in particular, could play an important role in digital wellbeing apps, support-ing behavior change **towards a more conscious use of technology, and ensuring the long-term effects of the new behavior**" - [REDACTED]
- * These features are often at level 3/4+ in the information hierarchy, limiting users' ability to find and take advantage of these features. If this is actually an important problem to solve, we should make our entry points more prominent
- * Users like these features' ability to provide transparency
- * Users dislike when these features have unintuitive design, high price, and when they are bypassible

Apple (OS), Android (OS), Facebook, Instagram, YouTube:

[figma]([HYPERLINK

	TikTok	Instagram	Facebook	YouTube	Netflix
Daily Time Reminder	✓	✓	✓	✓	□

Session Time Reminder	✕	✕	☐	✕	[HYPERLIN K "https://w ww.thever ge.com/2 021/1/29/ 22256308 /netflix- timer- test- feature- android- global- sleep-kids- ios-tv- desktop" \\h] ([HYPERLIN K "https://w ww.thever ge.com/2 021/1/29/ 22256308 /netflix- timer- test- feature- android- global- sleep-kids- ios-tv- desktop" \\h])
Quiet Mode (Bedtime)	✕	☐	✓	✓	✕
Usage Dashboard	✕	✓	✓	✓	✕
Feed Preferences	☐	✕	✓	✕	✕

[HYPERLINK [REDACTED]	✓	✗	✗	✓	✓([HYPERLIN K "https://h elp.netflix. com/en/n ode/264" \h])
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Previous Analyses

- * [HYPERLINK [REDACTED]
- * [HYPERLINK [REDACTED]

Appendix B: External Partnerships

[REDACTED]

Appendix C: External Policies and Research

- * [HYPERLINK "https://www.aspeninstitute.org/programs/aspendigital/" \h] - [HYPERLINK [REDACTED]
- * [HYPERLINK "https://www.pewresearch.org/" \h] - [The Future of Wellbeing in a Tech Saturated World.pdf]
- * [HYPERLINK "https://www.humanetech.com/" \h] - [HYPERLINK "https://www.humanetech.com/technologists" \l "principles" \h]
- * [HYPERLINK "https://www.common sensemedia.org/" \h] - [Media Use by Tweens and Teens.pdf]
- * [HYPERLINK [REDACTED]

See more extensive list here: [HYPERLINK [REDACTED]

Appendix D: Internal User Research and Analysis

- * [HYPERLINK ██████████]
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- * [HYPERLINK ██████████]

See more extensive list here: [HYPERLINK ██████████]

App store reviews



██████████

★★★★★ February 2, 2021



129



Great! It's good to watch people do things differently in life and learn different ways of going about life. Also heaps of educational sources that I've come across and helpful tips, and people sharing their knowledge and experiences. Although this app can get very addictive and keep you up for hours!



██████████

★★★★★ February 1, 2021



43



hi, i love this app its so addictive but i have some problems. my sister and brother and me are stuck at 3am scrolling through it! There's a lot of anti bullying on there i caught my sister crying. this may not be so important but random people spam block and report to us and we never posted or have...

[Full Review](#)



██████████

★★★★★ January 25, 2021



29



It's pretty nice app, honesty addicted. You pretty much just scroll and watch videos. That's honestly it. Even if it's just scrolling and watching videos, it's still very addictive. I also recommended you only let teenagers on this app and not little kids

★★★★★ February 3, 2021

Do not download this app unless you're able to spend at least two hours a day on it. It's addicting! Even some of the ads can be interesting. And if not, just swipe thru them.

K ★★★★★ January 22, 2021

I highly recommend that you don't get Tik Tok because I've been addicted ever since I started posting! Unless you want to be dragged into a whole lot of fun and videos, please do not download this app! In other words I love Tik Tok! Like I said, it's addictive. :)

★★★★★ January 19, 2021

Addictive!! Beware!! Only issue is sometime I make a mistake and scroll off of a video and then I can't find it again. Where's the history or recently viewed? At least show history of the last 5 or 10 videos.

★★★★★

12/31/2020

I deleted TikTok

I deleted TikTok a while back. Let me just say, TikTok can be very entertaining and fun. I enjoyed making videos and all the cool features. However, the app can become extremely addicting and I find so many young kids from the age of 8 on this app and there is so many inappropriate videos that are being shown. Many bugs and fixes needed as well but that's nothing too big. Also, If you are a fan or hate page, or even if you are a young child who just posts something for fun on a public account, (which if you are under 13 I recommend not to have public) you should expect hate. The amount of hate on this app is huge and it can be very hurtful. So please before you download, think about other less harmful apps. If you are under 10, I recommend the messenger kids app. Parents with Facebook can easily set this up and kids can chat with their friends (chats monitored) I find it cool that they added a new feature where you can record yourself with a song (like TikTok) appropriate songs are guaranteed. My much younger sister had TikTok, but I convinced her to delete it and now she spends a lot of time calling her friends, and making these kid-friendly "TikToks" and sending them to her friends. It is so cute to see her send these cheesy text messages to her friends rather than be scrolling through videos that can contain inappropriate content, as she should considering her age. TikTok is fun, but don't waste your time, enjoy life.

x



01/11/2021

Well it's good but bad at the same time

The first time you get this app, you think it's really cool and very fun. You may think it's an app for kids but... this app can get you in a LOT of trouble. The reason why I say that is because you have to think before you talk or do anything . If you DONT people will cancel you and send you death threats. And you won't even have any time to apologize. On TikTok there is a group of careless teenage boys called "The Boys" and they cyber bully EVERYONE that is a poc/minority, lgbtq, or have a disability. If they see that you are one of them they will send you messages that are very harming. Not only that but this app can be very addicting you start to forget about your school work, friends, and even your family. You talk less with the people you love and know and person, because you're always obsessed with your videos getting 100+ likes and trying to not get yourself shadow banned. Also I think TikTok should remove the videos for being our pfp because they are the main ones to not get taken down unless you have a lot of people reporting it. This app should not be for kids that are 12 or younger, because they be involved in cp or any other dangerous activities. I don't think this is a good app, and I would be more than happy if this app were to be taken down.



09/22/2019

Stupid but addicting.

Once you get into tiktok it's a like a little world. But I have some complaints. First off, the lives. Only people over 1000 followers get to go live, which I think is ridiculous. Maybe you should give new users around 25-50 followers when they first start so at least they have something. Secondly, you need to fix your issue where people randomly get suspended by their lives for getting reported. When someone is reporting you should make it a REQUIREMENT to have evidence and if they don't have any, their complaint is invalid. Thirdly, the age limit. It needs to be where people only up to 20-25 should be able to sign up, minus "thebentist" and the other cool, family friendly tik-tokers that everyone loves. I think this because girls and boys are constantly getting verbally harassed by older people on tiktok, such as the Budday. They are being forced to do things they don't want to or see graphic things. Or are tricked to give personal info such as their number, email, etc. These are just a few of my complaints. Please work on these because these are universal problems on TikTok.

Thanks!



05/24/2019

Not responding to reported problems!

TikTok. This is a great app! And I even find myself obsessive, very very obsessive. The app is just too hard to get off of, it's addicting!

My problem is, I've been hacked. I've reported my problems several times to you leaving my phone number to get contacted anytime. I haven't got any type of response, any text, etc. I really do enjoy this app, but I would like to keep up with trends and make different accounts. I've worked super hard for my 2500+ fans, and I would really like to keep them!

Also, I feel as if my app is draining a lot of my battery as well as taking up a lot of my storage. I've had to offload a TikTok a few times and so has my phone on its own. So basically because of this problem, I only have about two apps and about 68 pictures. I am factory restoring my phone this weekend, but I don't want to lose my whole Tik Tok account! I've asked more than several people to use their phone numbers that they haven't used already, for Tik Tok. I also think the idea of that only using a phone number once, isn't a very good one. Once you use your phone number, you have to use a different one! I hope you understand!-

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