

AMENDED Exhibit 572

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

Kersul Exhibit No.

18

8/20/2025 LT

「Project M」 Teen protection weekly syncs (Concluded)

TL;DR *(Updated on Mar 29, 4:00 PM PST):*

Context:

Minor Safety and Teen Protection is important for our company. We are rallying cross-company efforts to create and/or enhance teen protection features and present positive TikTok's image to the public

Project Conclusion :

* We concluded the Project M weekly sync on Mar 29. Moving forward, each product owner will continue to monitor how those features land, and user adoption.

Announcement Strategy:

We will take a phased announcement approach, including three waves

- Announcement 1 - March 1 [Completed]: Teen & community screen time features & Family Pairing updates
- Announcement 2 - March 14th [Completed]: STEM feed
- Announcement 3 - March 16th [Completed]: Refresh
- Announcement 4 - TBD*: Keyword filters in Family Pairing (*depends on product readiness, risk item due to feature development in the early stage, and the delicate balance between the concerns of the parent groups who want this feature and advocacy groups who worry about it would let parents block sensitive keywords.)

Estimated Major Milestone Timeline

- * **TBD***: Announcement 4 - Keyword filters in Family Pairing (*depends on product readiness, high risk)
- * **March 23**: Shou's congress testifying (plus Indiana)
- * **March 16th**: Announcement 3 [Completed] - Refresh
- * **March 14th**: Announcement 2 [Completed] - STEM feed
- * **March 7**: Shou in DC

* **March 1: Announcement 1 [Completed]** - Teen & community screen time features & Family Pairing updates, (estimated to be 8 topics in total)

- Completed with successful coverage

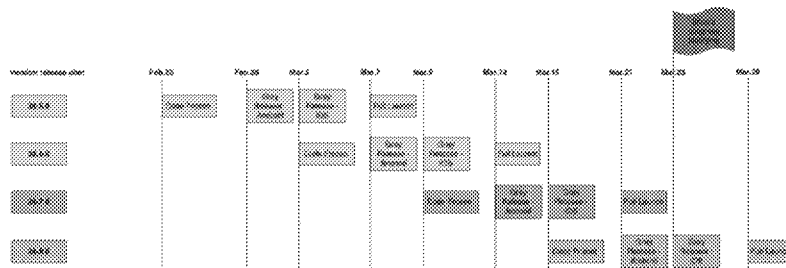
* **Feb 27: Private account by default for teens [Resolved]**- Decision by [REDACTED] target Feb 27 EOD (SG/CN time)

- Private account by default for teens - Decision by [REDACTED] target Feb 27 EOD (SG/CN time) - OK to announce, but choose to not to due to uncertainty and risk

* **Feb 23: Pending Decision Items stayed open [Resolved]**

- Private account by default for teens - Decision by [REDACTED] target Feb 27 EOD (SG/CN time)
- No targeted ads to U18 users - Not to announce before March 23

* **Feb 22: first round cutoff date for us to decide on what to include in an announcement [Resolved]**

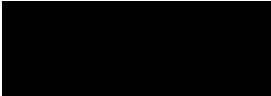


Decision-making process

- * Each feature owner runs their project autonomously.
- * Every Weds Teen protection working group meets to update each other's status, and highlight risks and callouts
- * Ad-hoc key decision group chat/meeting with Sandeep, [REDACTED]/Wenjia, Michael, (Shou if needed) whenever needed to unblock

Projects Overview (Updated on Mar 29, 4:00 PM PST)

TikTok Core Feature	Deliveryables	Announcement	Release Date	Launch Target	Final Status as of Mar 29	Discussion Group	PM Owner	RD Owner	DTSOM	TSP
		Decision						(TB/C)		

7.	No targeted ads to U18 users	Pending on alignment	Status: Callout: Agreement to take a US-wide approach, not state-by-state Need ~1 additional week for decisionmaking	
8.	Private account by default for teens	Pending PRD work in progress	Status: changed to be announced in march, PRD work in progress. Engineering effort has not started yet. Callout: owner to be found  (SG)	
Comms immediate announcement	Immediate announcement [HYPERLINK ]	Feb 22: cutoff date for us to decide on what to include in an announcement	Status: Callout: [HYPERLINK ]	 @Jamie Favazza

Feb 10

Announcement

- ☒ Targetting to have a decision-making resolution: ~~Feb 15 next week wed~~
- Sandeep,  Wenjia, Michael , through Lark group

TikTok Core Feature Announcement	Deliverables	Status Update	Owner
1. Screen time limits <u>on by default</u> for teens	[HYPERLINK [REDACTED]	Status: - Passed T&S product, content, UX, tech, compliance reviews - Tech design in progress - Comprehensive review on Monday Callout: - Need leadership sign off on 60 minute proposal, which drops global stay duration by 1.5% - Current plan is to get rid of the custom pin code and to instead have a preset pin code. Any concerns with this? - Still planning on testing a no pin and pin variant, but no pin does not have same level of friction. Should we even do this? - Not technically possible to fully launch on 3/8 since we need to A/B test. To meet that, eng would have only had 1 week to code the whole feature. They are targeting completing code by 2/23 for app store deadline for a 3/8 experiment start date	@Jordan Furlong
	[HYPERLINK [REDACTED]	Status: target sending it to leadership today, currently landing on 60min hard cap Callout: need to add family pairing to kids mode	[REDACTED]

Commented [49]: [image]

[THUMBSUP] 2023-02-11 00:11:52

Commented [50]: What will the app version be? 28.7?

Commented [51]: [REDACTED] Merge in 28.5

		* will NOT be in march release, still needs to figure out timeline with engineers * "No option to extend the time limit" is a stronger story, but may set a bad precedent on us "taking a stance" on acceptable screen time duration * Not including family pairing, including hard cap, looking into family agency, keeping the options open with broad language	
2. Push notifications <u>disabled at disruptive times</u> for teens	[HYPERLINK]	Status: * Passed T&S product, push product, UG+push tech, content, UX, and compliance reviews * Tech design in progress across T&S, push, and UG engineering teams * Trying to figure out A/B test design Callout: * [Same as above] Not technically possible to fully launch on 3/8 since we need to A/B test. To meet that, eng would have only had 1 week to code the whole feature. They are targeting completing code by 2/23 for app store deadline for a 3/8 experiment start date	@Jordan Furlong
[Impact Analysis] Disable push notifications during	Completed	-0.03%-0.05% DAU , no stay duration loss Not move forward	@Jordan Furlong

Commented [52]: OK to start testing on 3/8

Commented [53]: 99% chance design will stay the same. Low risk feature

	school hours for minors		
3. Create r <u>support to parents/care givers</u> in managing teen screen time (Family Pairing)	[HYPERLINK [REDACTED]	Status: Ready for development Callout: Pending Engineering Assignment - Following up Monday at start of iteration. Europe will be delayed a bit due to extra engineering needs. (opt-in journey)	@Matthew Tenenbaum [REDACTED]
	Announce marketing and educational campaign (partnering with PTA) for family pairing	Status: Callout:	[REDACTED]
	[HYPERLINK [REDACTED]	Status: Family Pairing version complete Callout: Need to align on releasing this as combined feature or not including this in our Project M scope.	@Matthew Tenenbaum
	[HYPERLINK [REDACTED]	Status: Complete - Going to Comprehensive review Monday Callout: Need to align on final targeting strategy. Aligned on L5, new + existing	@Matthew Tenenbaum
	Filter	Status: Proposal is being worked	@Matthew

	keywords	on - early next week, thinking process of risks Callout: restriction on parents - all or nothing; important feature; sensitive keywords; timeline	Tenenbaum
4. Create <u>r user control</u> over For You Feed	[HYPERLINK [REDACTED]	Status: * A/B test starting today * Had to adjust configuration to the experiment based on engineering feedback Callout: * Coverage has already started ◦ [HYPERLINK "https://www.theverge.com/2023/2/2/23583225/tiktok-testing-refresh-button-fyp-algorithm-reset" \h] ◦ [HYPERLINK "https://www.washingtonpost.com/technology/2023/02/02/tiktok-transparency-center-opens/" \h] ◦ [HYPERLINK "https://techcrunch.com/2023/02/02/tiktok-introduces-a-strike-system-for-violations-tests-a-feature-to-refresh-the-for-you-feed/?tpcc=tcplustwitter&guccounter=1" \h]	@Jordan Furlong
5. Expansion of <u>age assurance</u> measures	Integrate with 3P age verification solutions	Status: Product proposal in legal review, vendor review in progress Callout: no timeline from legal yet, may be next week EU focused provider. How do we	[REDACTED] @Natalie Medoff [REDACTED] [REDACTED]

Commented [54]: Should we discuss keyword filtering here also? Do we consider this "in-scope?"

Commented [55]: @Jordan Furlong what do you think? Let me know if I should add in another additional item here. Thank you.

		frame it for US	
		Contract needs to be signed before announcement?	
6. STEM Feed	[HYPERLINK [REDACTED]	Status : Internal beta: 3/2, aiming Monday comprehensive review Plan to rollout: week of 3/23 Callout : consider [REDACTED] [REDACTED] s feedback	[REDACTED]
			Commented [56]: @Jamie Favazza please discuss with [REDACTED] offline
			Commented [57]: Bump
Ads Monetization			
6. No targeted ads to U18 users		Agreement to take a US-wide approach, not state-by-state Need ~1 additional week for decisionmaking	
7. Private account by default for teens		Status: changed to can announce in march, abtest is running, Callout: owner to be found [REDACTED] [REDACTED] (SG)	
Comms immediate announcement	Immediate announcement [HYPERLINK [REDACTED]	Status: Callout: [REDACTED] * screen time limits by default (who are we working with,	[REDACTED] @Jamie Favazza

what is the time limit), ability to commit publicly to no notifications during school hours, no personalized ads for teens, an age verification partner to name, etc

Feb 9 - San Jose in-person meeting

Attendees: [REDACTED]

Agenda & notes:

1. Program visibility/coordination/docs/groups/linking
2. Decision-making process , decisions needed
 - Weekly working meeting
 - RACI matrix:
 - * Product manager should be the decider, incorporating people's feedback
 - Decision making meeting: **Wed Feb 15 next week**
 - Sandeep, Fiona/Wenjia, Michael
 - Some Decisions Needed
 - [REDACTED] Screen Time Management Kids Mode + 13-17 (Jordan [REDACTED])
 - * PIN? If so, logic?
 - * Duration?
 - * Differences between KM & 13-17?
 - * Commit to FP support for KM? (Future of KM investment?)
 - [REDACTED] STEM feed
 - * Goals/Metrics/Success criteria: Focus on trust and perception instead of adoption (Douyin < .5%)
 - * Name & optionality (recommend STEM)
 - * 3P decision? (Algo PM)

2. Push notifications **disabled at disruptive times** for teens

[HYPERLINK

Reviewed designs yesterday, refining now. Starting 3 needed product review meetings next Monday

3/8 / ASAP ?

@Jordan Furlong

[Impact Analysis] Outright disable push notifications during school hours for minors v. Default push off for teens...

Global DAU loss 0.03%-0.05% , no stay duration loss ([HYPERLINK

Completed

@Jordan Furlong

No push was sent to all teens from Mon-Sun, 9a-3p

This will be used as impact estimate for new approach in above PRD to enable setting by default for teens

3. Create **support to parents/caregivers** in managing teen screen time (Family Pairing)

[HYPERLINK

Arranging for RD assignment.

End of Feb/A SAP?

@Matthew Tennenbaum

Announce marketing and educational campaign (partnering with PTA) for family pairing

Commented [63]: Is there anything in family pairing or that we could add on the content side?

Commented [64]: Why is this crossed out?

	[HYPERLINK [REDACTED]	Reviewing first design iterations today. Starting 3 needed product review meetings next Monday	3/15 / ASAP ?	@Mat thew Tene nbau m
	[HYPERLINK [REDACTED]	Finalizing content this week. Starting 3 needed product review meetings next Monday	End of Feb / ASAP ?	@Mat thew Tene nbau m
4. Create r <u>user control</u> over For You Feed	[HYPERLINK [REDACTED]	Initial comms this Thursday, experiment to begin shortly after that pending fix to currently broken build pipeline	End of Feb / ASAP ?	@Jor dan Furio ng
5. Expans ion of <u>age</u> <u>assurance</u> measures	Integrate with 3P age verification solutions	Initial assessment completed, need XFN review and sign off to proceed with Yoti integration phase 1 [HYPERLINK [REDACTED]	Pendi ng asses sment review (02/09)	@ Natali e Medo ff [REDACTED]
Ads Monentizatio n				

Commented [65]: Not conformtable with [REDACTED]

Commented [66]: In US. We'll most probably go with Yoti in EU

[REDACTED]: [THUMBSUP] 2023-02-02 05:57:22

[REDACTED]: [Get] 2023-02-02 05:57:36

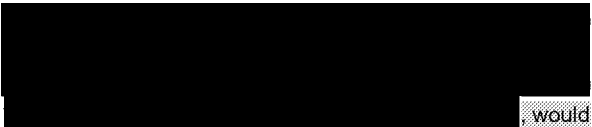
Commented [67]: Build in house vs 3rd party

6. No targeted ads to U18 users		
7. Account privacy on by default for teens	[HYPERLINK 	
Comms immediate announcement	Immediate announcement	TBD, Feb. Needs more concrete content for comments.  @Jamie Favazza

Jan 25

[10 min] Project updates - @Jordan Furlong

TikTok Core Feature Announcement Updates

1. Screen time limits on by default for teens
- [HYPERLINK

would be good to review with this group, need to review options

with client devs next week

* Q: No pin, pin, or pin optional? Does removing pin compromise feature at all?

- [REDACTED] fine to remove
- Micheal: needs more time to consider/feedback
- Jamie: science behind (Jordan can share more offline)
- [REDACTED] Think about who is setting the limit

2. Push notifications **disabled at disruptive times** for teens

[HYPERLINK

[REDACTED] - Kicked off with team, designs in progress, PRD expected to be completed next week

[Impact Analysis] Disable push notifications during school hours for minors - Push team running A/B test to get impact estimate

3. Greater **support to parents/caregivers** in managing teen screen time (Family Pairing)

[HYPERLINK

Submitted to our RD team before the holiday and now only pending Inbox team feedback on notification work.

[HYPERLINK

Kicked off with design this week, aligning with DS, working to finalize PRD to be complete next week.

[HYPERLINK

Aligning on new targeting and content design with XFN partners. Expecting final legal review next week.

Announce marketing and educational campaign (partnering with PTA) for family pairing - N/A, campaign already running

4. Greater **user control** over

[HYPERLINK

Commented [68]: @Matthew Tenenbaum Could you include some one liner updates on these projects like I did above? Just talking points to speak to live tomorrow. Also if you have a doc to link for #3 go for it

[THUMBSUP] 2023-01-25 08:49:29

Matthew Tenenbaum : [OnIt] 2023-01-25 14:50:24

Matthew Tenenbaum : [DONE] 2023-01-25 23:50:11

For You Feed 1o" \h] - Prepping for A/B test as soon as next week. Still finalizing timing of this with PR

5. Expansion of age assurance measures Integrate with 3P age verification solutions

Commented [69]: [REDACTED] to provide an update on this part
[REDACTED] : [THUMBSUP] 2023-01-25 09:17:03
[REDACTED] : [THUMBSUP] 2023-01-25 10:51:41

Ads Monetization

6. No targeted ads to U18 users need stakeholders alignment

7. Account privacy on by default for teens Won't be in this announcement yet

Commos Teenhub announcement Date TBD. Comms eeds more concrete content for announcement purposes

1. [HYPERLINK [REDACTED]

[REDACTED] refining design options, would be good to review with this group

2. [HYPERLINK [REDACTED]

[10 min] Project overview at the top

[10 min] Action Items & Buffer discussion

Jan 18

@Jordan Furlong

- **Screen time PRD** target next week after iron out design
- **Push notification disablement:** previous work exisited, but low priority, needs to adapt to family pairing , PRD to come

- Push notification disablement: Do we want to do it during school hours as well?
 - Not much progress yet, needs data science team support, delay due to spring festivals
 - Historical analysis, our own analysis
 - @Jamie Favazza/ @Jordan Furlong policy global implications, impact analysis, could be used outside of school hours as well. ~ 6 weeks to have the test. Needs PRD, and data analysis.
- [REDACTED] US specifics needs discussion?
- **Family pairing:** usage dashboard design, dev to start after spring festival
 - Education campaign: Jordan shared some previous results: [HYPERLINK [REDACTED]]
 - Time configuration: ongoing
 - Upsell: real goal needs clarification - awareness or uptick adoption
 - * [REDACTED] wait for improvement if we try to prompt users multiple times -> marketing campaign [REDACTED] is working on)
 - * [REDACTED] make the announcement, notify users until the user is ready
 - * @Jamie Favazza clarification on what to announce, what will happen afterwards.
 - * [REDACTED] congress is moving fast, gr supports
 - * [REDACTED] we will take announcement, but implementation is better
 - Announcement sooner, implement slight different
 - @Jamie Favazza newsworthy material to create announcement-screen time, family pairing (QR code blocked by privacy legal), need to start abtesting for assurance
 - @Jordan Furlong get things into code asap
- **User control for your feed:** beyond minors
- **Education content:** not a commitment
- **Age assurance:** no commitment yet, next week to review,
 - [REDACTED] external partners evaluations, need legal approval first
 - * @Jamie Favazza need concrete first, will share commos strategies.
- No targeted ads to U18 users

Redacted Attorney Client

Redacted Attorney Client

. 10th Feb with Shou

- o Account privacy by default

running test

AI :

- * Shou monthly set up?
- * [x] Project tracker

Jan 11

Discussion points

- * [HYPERLINK]
- * Comms (decisionmaking on what to announce; preparation & review of the announcement itself)
- * Analysis (ensuring we can predict with reasonable confidence what the impact of the changes will be overall and to various business lines)
- * Implementation (near-term implementation of anything we want to launch at the time of the announcement AND longer-term implementation of anything we promise now, but launch later)

Notes

1. Misalignment between big bang newsworthy or not
 - a.
 - b. @Michael Beckerman sign off this week
2. Recommendation for tomorrow
 - a. Age test: no abtest yet, 1% impact , reallocate misclassified teens (7% -> 14%)
 - b. @Jordan Furlong 6-12 months on behavior changes
 - c. and @Michael: We have 'Age Assurance(Verification)' on the roadmap for 2023. If that makes the announcement a 'big bang', we could announce something about that. However, I dont know if our age verification work would be 'industry leading'.
 - not leading, support adding by michael
 - d. Budget allowed for trust related
 - e. Time limit duration <- TnS justification
 - f. Stay away comparing against other platform, citing research would be helpful
 - g. Validation is lacking

- h. Defensible - screen time: by default, 60min for 5 years old, pediatric
- i. Comms - announcements have things in order
- j. Transparency accountability
- k. Family pairing
- l. Christina - push notificaiton disabled - granuality & family pairing
- m. Later year to build it out
 - i. Gradation between the age of the teen
- n. Aspiration goal without hard commitments
 - i. Monetizaiton : not the whole meeting

To-Dos

- Goal: propose what we will/not do, committee, timeline

AI from review session with Shou

- * Teen advisory counsel & Child safety experts support
- * Teenhub announcement: Decided teen hub/youth hub relaunch is beyond the scope of this. [REDACTED]'s team from TnS is working on it. Tentative: April.
- * Decided teen hub/youth hub relaunch is beyond the scope of this. [REDACTED] team from TnS is working on it. Tentative: April.

Discussion notes:

- * We can announce what we are doing before it finishes.
- * Can we align the granuality for push notification - can be turned off (+ Michael, Jamie)
 - Commos need a sound rational:
 - Christina/Sandeep - AI: getting scheduling right, launch it fast

References

[HYPERLINK [REDACTED]

DOCUMENT METADATA

Bates Number: TIKTOK3047MDL-128-LARK-06477967-TIKTOK3047MDL-128-LARK-06478059

BEGATTACH: TIKTOK3047MDL-065-LARK-00768352

ENDATTACH: TIKTOK3047MDL-128-LARK-06478059

Attachment Count: 0

PRODVOL: MDL-128

Custodian: CRIMMINS, CHRISTINA; EBENSTEIN, ERIC; FURLONG, JORDAN

File Path: /MPLADLWJWOXCAAXBO0DUWMZ2SPH.DOCX

Confidentiality Designation: HIGHLY CONFIDENTIAL (COMPETITOR)

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Author:

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Sent Date:

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Subject:

Case 4:22-md-03047-YGR Document 2877-14 Filed 03/25/26 Page 21 of 21

THREADID:

REDACTIONS: Y

REDACTION TYPE: PRIV