

AMENDED Exhibit 581

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-Furlong

39

4/11/2025 - MOP

Digital Wellbeing on TikTok

Define and validate TikTok's digital wellbeing problem(s)

To properly identify and prioritize the TikTok wellbeing problem(s), we need a systematic, evidence-backed, and iterative approach. This effort is never complete since new problems will continue to arise and a lapse of attention poses large risks to TikTok users, brand, and business.

Keeping in mind the time and data limitations, the following three problems are prioritized with preliminary and insufficient research.

Commented [1]: These sections are really good to breakdown digital wellbeing but I think we still need a one-liner sentence. Digital Wellbeing to TikTok means X Y Z

1. Crude understanding of the digital wellbeing problem

Digital wellbeing has recently been popularized and the industry has scrambled to better understand the unintended mental, physical and social consequences of technology on society. We are still very early on in understanding digital wellbeing and the long term guardrails we need to implement to ensure a healthy relationship between people and technology. As an advocate and leader in digital wellbeing, TikTok needs to take ownership of this opportunity by pioneering the research and gold standard solutions for digital wellbeing.

Priority Justification

1. If we don't holistically understand the problem then we cannot properly prioritize work and resources will be misallocated
2. If we only have a surface level understanding of the problem, we will likely be very reactive and focus on current problems rather than foundationally addressing this and future-proofing the platform

Validation

* [[HYPERLINK "https://dl.acm.org/doi/abs/10.1145/3290605.3300616" \h](https://dl.acm.org/doi/abs/10.1145/3290605.3300616)] - As smartphone use increases dramatically, so do studies about technology overuse. Many different mobile apps for breaking "smartphone addiction" and achieving "digital wellbeing" are available. However, **it is still not clear whether and how such solutions work.**

* [[HYPERLINK "https://venturebeat.com/2019/10/23/google-launches-5-experimental-digital-well-being-apps-for-android/" \h](https://venturebeat.com/2019/10/23/google-launches-5-experimental-digital-well-being-apps-for-android/)] - Launched **October 2019**, Google only very recently started experimenting with how to solve digital wellbeing

* [HYPERLINK "https://www.pewresearch.org/internet/2018/04/17/concerns-about-the-future-of-peoples-well-being/" \h] "The long-term **effects of children growing up with screen time are not well understood** but early signs are not encouraging: poor attention spans, anxiety, depression and lack of in-person social connections are some of the correlations already seen, as well as the small number of teens who become addicts and non-functioning adults."

2. User addiction to TikTok

Addiction to technology is a ubiquitous problem that TikTok and most other platforms deal with today. Addiction takes many forms such as overall time spent on an app, de-prioritizing other important areas of life, and generating self-worth based on number of likes; all of which and countless others have made us realize the consequences of optimizing for engagement and retention metrics.

Priority Justification

- * Addiction is a primary reason people have a love-hate relationship technology because it competes against and often takes time away from other important areas of life like sleep, work, and social connections
- * This is arguably the most pervasive issue with popular online platforms and is associated with TikTok as much or more than anything else
- * Addiction is often cited by critics as a goal for popular online platforms in order to drive ad revenue. This narrative creates animosity between users and TikTok, which sours our community and threatens business longevity

Validation

Google and Apple app store reviews (see *Research & Brainstorming* for screenshots)

- * "... This app can get very addictive and keep you up for hours!"
- * "My sister and brother and me are stuck at 3am scrolling through it!"
- * "Even if it's just scrolling and watching videos, it's still very addictive. I also recommend you only let teenagers on this app and not little kids."
- * "Do not download this app unless you're able to spent at least two hours a day on it. It's addicting!"
- * "I highly recommend that you don't get TikTok because I've been addicted every since I started posting!"
- * "Addictive!! Beware!!"
- * "This app can be extremely addicting and I find so many young kids and there is so many inappropriate videos... TikTok is fun, but don't waste your time, enjoy life."

Commented [2]: I think there is an internal bytedance tool where we can search all app store reviews if we go deeper into this. We also have user feedback tools we can get reports from to support this section
Jordan Furlong : [THUMBSUP] 2021-02-13 05:43:09

- * "This app can be so addicting you forget about your school work, friends, and even family. You talk less with the people you love and know because you're always obsessed with your videos getting 100+ likes."
- * "Girls and boys are constantly getting harassed by older people on TikTok. They are being forced to do or see graphic things or triked to giving personal info like number, email, etc."
- * "I even find myself obsessive, very very obsessive. The app is just too hard to get off of, it's addicting!"

3. User safety on TikTok

User safety refers to the physical, psychological, and emotional threats posed to users on TikTok. It takes many forms, is continuously evolving, and requires our full attention as its presence on our platform directly endangers our mission to inspire creativity and bring joy.

Priority Justification

- * We cannot expect anyone who feels unsafe or threatened on TikTok to be a happy, engaged, and a long-term loyal user
- * If user safety is addressed holistically, there is a cascading effect of other sub-problems being addressed such as mental health, child protection, bullying, suicide, and misinformation/disinformation

Validation

Google and Apple app store reviews (see *Research & Brainstorming* for screenshots)

- * "There's a lot of bullying on there I caught my sister crying."
- * "You should expect hate. The amount of hate on this app is huge and it can be very hurtful."
- * "If you don't be careful with what you say people will cancel you and send you death threats."
- * "There is a group called 'The Boys' and they cyber bully everyone that is a poc/minority, lgbtq, or have a disability. If they see you're one of them they will send you messages that are very harming."
- * "This app should not be for kids that are 12 or younger because they can be involved in cp or other dangerous activities."
- * "Girls and boys are constantly getting 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."
- * "They are tricked to give personal info such as their number, email, etc."

With more time...

- * Conduct interviews and/or focus groups to better understand the severity of each digital wellbeing problem, enabling us to better prioritize and focus efforts
- * Research competitor platforms: product priorities/launches, partnership announcements, blogs, marketing
 - What problems are others prioritizing?
- * Analyze more feedback channels (social media, ticketing backlog, app store reviews, expert opinion pieces on digital wellbeing)
- * Brainstorm: Are incentives aligned between TikTok, Advertisers, and Users? Is the reason we have designed such an addictive experience to maximize ad revenue? In the long term, is this socially and fiscally responsible?

Metrics to measure digital wellbeing

Qualitative

- * Survey TikTok end users about their experience and opinions on their digital wellbeing
- * Define must-have/P0 digital wellbeing feature set and track completion
- * Media and expert coverage on the efforts (or lack thereof) to provide digital wellbeing

Quantitative

- * % of posted videos that get reported
 - **filter out videos that were improperly or unfairly reported, if possible*
- * Duration of time spent on TikTok past the Screen Time Management limit (Digital Wellbeing setting)
- * Sentiment analysis of app store reviews
- * Sentiment analysis of video comments

Commented [3]: I think the biggest one here that we can get is a country breakdown of playtime/user distribution. It would be interesting to see what the top 10% longtail of consumption looks like and I think we can pull this in TEA pretty easily

Commented [4]: @ [REDACTED] or addiction, yes

Top initiatives or features you would prioritize and why?

Problem	Initiative/Feature	Rationale
Crude	Clarify TTfG's role within	TikTok needs to be

understanding of the digital wellbeing problem	ByteDance's CSR strategy then adjust priorities and resource allocation accordingly.	consistent and aligned with ByteDance on this.
	Organize and host a TTfG/digital wellbeing hackathon within ByteDance to crowd-source ideas and kickstart prototyping.	Fully utilize the massive internal pool of talent and passion to uncover new problems and test solutions.
	Research best of breed digital wellbeing benchmarks in the market for short-term roadmap.	Learn from research and successful efforts that others have already figured out, so we don't re-invent the wheel.
	Commission industry leading research and incorporate findings in long-term roadmap.	This is an amazing leadership opportunity for TikTok - to set the standard of taking care of its community.
User addiction to TikTok	Time per session - in Screen Time Management, add a setting that allows users to limit how long each session is to act as a reminder that they have been on the app for too long.	People often don't stick to their daily limit because they don't know how they're tracking to get there. This is a helpful reminder to not have a binge session throughout the day.
	Bedtime / Downtime - in Screen Time Management, add a setting that allows people to set timeframes that they want to be off of TikTok so people are not distracted during sleep, work, school, etc.	Bad sleep is a source of many serious physical and mental health issues. This seems like an obvious low effort, high impact investment.
	Recommended Usage - Determine thresholds for healthy and unhealthy usage per day based on duration, frequency, and other unhealthy behavior.	Instead of relying on users to monitor themselves with controls they can override, TikTok plays a more proactive role in giving people the push they need

Commented [5]: This is pretty good! The approach and research you have are very clear and methodical. If you had to test one of the three features you proposed under the TikTok addiction problem area which one would it be and how would you test it?

Commented [6]: @ [REDACTED] Each of these sections are sequential, so I'd start with "Time per session". The core success metric would be % of times that users stop using the app when the session limit is hit. High % tells us that this is a helpful mechanism for people limiting their TikTok use to what they deem healthy.

	Encourage users to follow those guidelines. This can be informed by other Screen Time Management feature data.	to get off their device.
	Determine how TikTok can educate users or utilize common treatments to addiction * Cognitive Behavioral Therapy (CBT) * Dialectical Behavior Therapy (DBT) * Acceptance & Commitment Therapy (ACT) * Group Therapy TikTokTogether - Unlock special effects/filters/sounds/etc. only when you are with another TikTok.	Addiction is cited as a mental health disorder by the medical community. Experimenting with already validated treatments to this ailment could fast-track our understanding and resolution of the issue. People often spend too much time on their phones because they are by themselves and bored. This incentivizes friends to get together, have fun, and ultimately just spend time together.
User safety on TikTok	Tolerance Scores - 1. Assign tolerance scores to each user based on sentiment analysis of comments, posted videos, reports/blocks against user, etc. Users with crude behavior are assigned a high tolerance score 2. When Restricted Mode is enabled, content from users with high tolerance scores is hidden Provide a suicide prevention	Child safety, crude language, and bullying are some of the biggest threats to user safety on TikTok. This makes it easier to protect the vulnerable or sensitive from content they shouldn't be seeing. Even if TikTok can guide a

- Partnerships
- Funds
- Events
- Educational resources
- Integrations
- * [HYPERLINK "https://www.facebook.com/safety/wellbeing" \h]
 - Safety Center
 - Privacy Checkup
 - Security Checkup
 - Parents/Youth portal
 - Digital Literacy Library
 - Online Well-being home page
- * [HYPERLINK "https://wellbeing.google/our-commitment/" \h] - Central source of information for products, research, and other various resources dedicated
 - "The jury's out on whether technology is a good or bad thing. It's depends on how we decide to use it."
 - <https://wellbeing.google/my-tips/?tips=2,3,4>
 - Tip 1: Manage apps & notifications to reduce distractions
 - Tip 2: Minimize device use when with others
 - Tip 3: Create boundaries for yourself
 - <https://static.googleusercontent.com/media/wellbeing.google/en//static/pdf/digital-wellbeing-tips.pdf>
- * [HYPERLINK "https://www.pewresearch.org/internet/2018/04/17/concerns-about-the-future-of-peoples-well-being/" \h] "The long-term effects of children growing up with screen time are not well understood but early signs are not encouraging: poor attention spans, anxiety, depression and lack of in-person social connections are some of the correlations already seen, as well as the small number of teens who become addicts and non-functioning adults."
- * App store reviews

★★★★★ February 2, 2021  121

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  53

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  23

It's pretty nice app, honestly **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 5, 2021  1

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.

★★★★★ January 22, 2021  1

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  1

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 "thebentis" 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!

全文点赞列表

@

全文评论

Commented [8]: Overall comments: - Need to define Digital Wellbeing, I think this should be sharp and easily understood by people reading it. - To me user addiction to TikTok leads to more User Safety issues. I'd focus on addiction as I think that is currently the area that I haven't seen too much action being taken on (maybe a bigger question is why hasn't there been more invested on it)

DOCUMENT METADATA

Bates Number: TIKTOK3047MDL-072-LARK-01130108-TIKTOK3047MDL-072-LARK-01130118

BEGATTACH: TIKTOK3047MDL-072-LARK-01130108

ENDATTACH: TIKTOK3047MDL-072-LARK-01130118

Attachment Count: 0

PRODVOL: MDL-072

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HASHVALUE: 0745B89F2E33D68AA02A85A60531653A

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Create Date: 2/7/2021 12:00 AM

Last Modified Date: 2/7/2021 12:00 AM

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Filename: TIKTOK3047MDL-072-LARK-01130108.PDF

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