

AMENDED Exhibit 601

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

[TnS] Sleep Reminders

Basic Info

Partners // 合作方

Please tag the POC you work with in this requirement, add roles if this template didn't cover, also add their comment on Sign off or not. // 请填写本需求的需求方或者密切合作方，可以根据需求添加或删除相应的角色，需要填写相关方的评估意见（是否 Sign off）

PRD status:	Under PRD Writing	
Region:	Global	
Team	POC	Comments
PM	@Jordan Furlong	☐ Signed off
Data		☐ Signed off
UX Design		☐ Signed off
UX Writing		☐ Signed off
Eng		☐ Signed off

Change Log

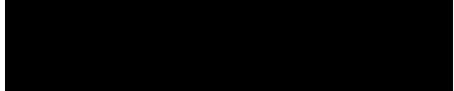
Date//日期	Description // 描述	修改人 // by
6/13	Created	

- | | |
|------|---|
| 7/18 | Initial version for Internal Review |
| 7/21 | <ol style="list-style-type: none"> 1. Remove multiple sleep schedules 2. Remove the ability to customize the name of the sleep schedule 3. Remove wind down nudge 4. Limit Delay (10m) option to three consecutive pop-up reminders |
| 8/10 | <ol style="list-style-type: none"> 1. Add muting of push notifications during the sleep period 2. Add A/B test for 'Delay (10m)' button in sleep reminder pop-up 3. Update announcement notification channel to 'Screen time' 4. Remove sleep reminder toast 5. Remove day of week configuration in settings |

Relevant Links

	Links	POC
Link to Meego Ticket	[HYPERLINK [REDACTED]	PM
Link to Legal Ticket	[HYPERLINK [REDACTED]	Legal
Link to Figma/Demo	[HYPERLINK [REDACTED]	Product Designer

Link to Starling [HYPERLINK  Content Designer

Link to Event Tracking [HYPERLINK  DA

Other Useful Links PR, etc.

Projected Impact & Comprehensive Review // 项目影响&是否参加 TikTok 综合评审

[HYPERLINK ]

	Region	DAU Percentage	Projection Confirmed by (Product Leader or DA)	Key Feature ?	Comprehensive Review Date
Overall	All	0.10% DAU (estimated by Session Duration Reminder DAU and adjusted for reduced targeting of feature announcement) *~4% DAU will receive the feature announcement notification targeting users who have entered the Digital Wellbeing		No	N/A

page and are in the top 20% of night time users (active on TikTok 12AM-5AM at least 5 days in the last two weeks

Clients

We don't advise against adding new features to Kids mode be default need to go through legal review process. If you want to, read this document [[HYPERLINK](#)

Priority // 优先级 - P0

Specify the priority of this product requirement, which should be based on [

and aligned with your team lead. In addition, highlight & update the fitting criteria in each category to justify the priority.

Priority: P[0]	Extremely High	High	Medium	Low
User type		* High risk user (eg minor)	* Common user	
Market type			* Key markets	
Source of requirements			* T&S Feature bi-month major OKR	

Commented [1]: Hi@Jordan Furlong, not sure if you're the right person to ask, but do you have a list of markets that are testing/launching this and the corresponding dates? Thank you

Commented [2]: @ [REDACTED] test already completed [[HYPERLINK](#)

[REDACTED] be launching globally in the next 1-2 weeks, still finalizing with comms

[OK] 2023-01-27 17:40:58

[THANKS] 2023-01-27 17:41:01

Commented [3]: @Jordan Furlong! heard from my JP XFNs that no one has reached out regarding this launch so I wanted to check. Thank you!

Jordan Furlong : [THUMBSUP] 2023-01-28 06:43:20

Problems to deal with	* GR risk	* Potential legal risks * Major product iteration * PR/Brand risk	* Brand image improvement * Community sustainable development
Expected returns		Positive impact on LOB metrics or TnS metrics	

Intro & Goal

What are we building?

Users can set sleep reminders to help manage their screen time at night and promote healthier sleep habits. Push notifications are muted during the user's sleep period. The feature will be tested ahead of a full launch

Why build it?

Problem statement: The use of TikTok at night delays sleep for some users, disturbing their sleep patterns and preventing them from getting the minimum recommended amount of sleep.

Problem validation:

Moved due to sensitivity: [[HYPERLINK](#)

Business and Reputational Impact:

- * Users are more likely to churn or reduce activity on TikTok if the app negatively impacts their ability to manage their time and tend to their basic needs

- 23% of inactive users cite too much time spent on TikTok [[HYPERLINK](#)

- * TikTok has received negative media coverage as "the worst social media app for sleep" ([[HYPERLINK "https://au.lifestyle.yahoo.com/social-media-app-tikok-keeping-you-awake-bad-sleep-041323202.html"](https://au.lifestyle.yahoo.com/social-media-app-tikok-keeping-you-awake-bad-sleep-041323202.html)] \h),

- * TikTok is particularly susceptible to criticism on screen time from policy makers ([HYPERLINK [REDACTED]

◦ *"TikTok is particularly susceptible to criticism on screen time, with policy makers and key stakeholders expressing concerns about how our algorithm is designed to encourage compulsive use and undermine user agency."*

Regulatory Risk:

- * The UK's Age Appropriate Design Code (AADC), lists "interrupted or inadequate sleep patterns" as a potential risk to be assessed and mitigated. ([HYPERLINK "https://ico.org.uk/media/for-organisations/guide-to-data-protection/key-data-protection-themes/age-appropriate-design-a-code-of-practice-for-online-services-2-1.pdf" \h])
- * The California Age-Appropriate Design Code Act, modeled after the AADC, is currently making its way through the California legislature. ([HYPERLINK [REDACTED]

- * Singapore GR recently had a discussion with a multi-government taskforce looking at the impact of social media on youth mental health. The taskforce is investigating a number of issues, including how social media affects sleep, which in turn affects wellbeing.

Additional:

- * External research suggests sleep disturbance mediates the relationship between screen time and depressive symptoms ([HYPERLINK "https://pubmed.ncbi.nlm.nih.gov/30897456/" \h], [HYPERLINK "https://pubmed.ncbi.nlm.nih.gov/25204836/" \h])

Solution Validation:

1. User research and expert opinion indicate teens have a desire for flexibility and autonomy in STM features and a preference for interventions that do not abruptly interrupt the user experience. Giving teens control over managing their screen time supports their development through adolescence as they learn to self-regulate.

- a. [HYPERLINK [REDACTED]
HYPERLINK [REDACTED]

2. Usage warning – a warning e.g., 5 minutes before your time is up

- Seen as essential and necessary to not diminish user's experience by cutting usage off immediately – there were varying opinions about the time period of the warning (three 2 minutes to an hour), but what was agreed upon by most teens and parents is the flexibility to customize the usage warning.
- Some teens mentioned that a visual cue would be desirable, but some also mentioned a sound or buzz of the phone they were using.

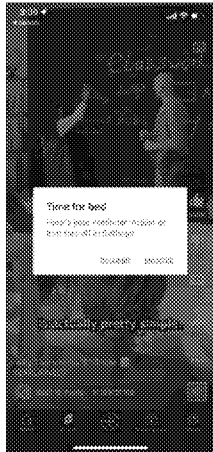
2. *Flexibility and variation in design* – having a design which adapts to usage habits without diminishing the user experience was important to teens. They generally enjoy their screen time and although they want support managing it, they want to have control over it and the flexibility to make changes to suit their circumstances or custom screen time during school holidays, less screen time when they have other demands on their time.
"So you can finish whatever... you're watching and end your session feeling satisfied rather than interrupted" (UK, 14, girl)

- b. [HYPERLINK [REDACTED]

- Interventions must appeal to teens' normative drive for autonomy.

- Digital interventions for teens should be **opt-in**. Teens should have a choice, and they tend respond best (in the most healthy ways) when offered that choice.
- To be effective, the message must be framed as START something new (and cool), **not** STOP X, Y, or Z activity or behavior.

2. Late night TikTok activity is associated with relatively longer session durations and lower number of sessions per user (see . This suggests an in-session reminder may be most effective in curbing user activity after bedtime compared to a feature that deters users from beginning a new session.
3. Sleep reminders are becoming the industry standard in promoting healthy screen habits at night, as YouTube and Douyin have launched similar features (see Appendix)

Douyin	Youtube
Calming video and sleep reminder in feed with options to edit or ignore	Sleep reminder pop-up with options to edit, snooze, or ignore
	

4. Existing TikTok STM features include daily screen time limit, session duration reminder, and TAB videos (see Appendix). Night STM feature should offer a unique solution to address the problem of *when* users are active (vs. *how much*)

What are our Success Metrics?

Success Definition:

The primary objective of this feature is to give users agency in managing their screen time at night, which will help them reduce screen time during their typical sleeping hours and maintain a healthy sleep schedule.

Metrics:

Group	Goal	Metric	Expected
Success - Primary	Reduce screen time during typical sleeping hours	Average total daily session duration 12am-5am / DAU	Decrease
Success - Secondary	Adoption of Sleep Reminders	Sleep Reminder DAU (% of total DAU with a sleep reminder configured)	0.10% of DAU, measured 2 weeks after launch
	Increase adoption of Screen Time Management features	Screen Time Management DAU (% of Total DAU)	Small increase
	Positive brand safety impact	Positive media/regulator feedback	-
Guardrail	Observe trade-offs and impact	Total stay duration / user	Fluctuate / Very small decrease
		Publish / user	No impact
		App uninstall rate	Small decrease

Requirement Detail

User Interaction & Design

[figma]([HYPERLINK])

Scenarios	Interactions	Online version	Expected design
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