

AMENDED Exhibit 602

**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



[P0] [TnS] Impose Stricter Time Limits on Sending Push Notifications to Minors - RoW Rollout

Basic Info

Partners // 合作方

PRD status: Under PRD writing / Finish Push product review / Under development / AB test / **Launched**

Updated on 12.13.2022

Team	[HYPERLIN K "https:// www.tea mgantt.co m/blog/ra ci-chart- definition -tips-and- example" \\h]	POC	Comments
T&S PnP Feature	R	@Matthew Tenenbaum	☒ Sign-off
Push Feature	C & I	@郭楠	☒ Sign-off
Data	R	@Han Yin	☒ Sign-off
T&S Issue PnP	I	@Christina Crimmins@Sara	☒ Sign-off

Analoui			
UG	I	@Anh Nghi Le Viet	
Global GR	I		☑Sign-off
Global PR	A	@Jamie Favazza	☑Sign-off
Legal	A	@Jonny Lin@Elaine Lin	☑Sign-off

Change Log

Date//日期	Description // 描述	修改人 // by
6.28.22	Document Created	@Matthew Tenenbaum
12.12.22	Launched	@Matthew Tenenbaum

Relevant Links

	Links	POC
Link to Meego Ticket	https://meego.feishu.cn/tiktok/story/detail/5656693	@Matthew Tenenbaum
Link to Legal Ticket	https://legal.bytedance.net/compliance/detail?id=112173	☑Legal
Compliance Exemption Application	https://cloud.bytedance.net/bpm/record/6375122?target_system=Shepherd	☑Legal
Link to Event Tracking	N/A	DA
Other Useful Links	- Regional release PRD Link [HYPERLINK "https://bytedance.feishu.cn/wiki/wikcn5Gu69Ux9QiXBsce120tVc" \h] - AADC	@Matthew Tenenbaum

[HYPERLINK
"https://bytedance.feishu.cn/docs/doccnbs
R4T3qqu5lvnEiFOuGjTd" \h]

* EU legal recommendations

[HYPERLINK
"https://bytedance.feishu.cn/docs/doccnpA
KR975ySk3XZ3LyKdJVvh" \h]

* Press Release

<https://newsroom.tiktok.com/en-us/furthering-our-safety-and-privacy-commitments-for-teens-on-tiktok-us>

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

[HYPERLINK "https://bytedance.feishu.cn/wiki/wikcn3dcEq7i3NGrdgsjfn4CGPd" \h]

	Region	DAU Percentage	Projection Confirmed by (Product Leader or DA)	Key Feature ?	Comprehensive Review Date
Overall	All	6.07% ([HYPERLINK "https://tea- va.bytedance .net/tea/app /55/dashboa rd/71232335 4488907418 1" \h])	@李佳佳	Yes	No

Clients

[sheet-shtcn3k5PHI127Hebeq75UPtSMd_yE7SDj]

Priority // 优先级

Priority: P[0]	Extremely High	High	Medium	Low
User type	* High risk user (18-users)			

Market type	* Global market
Source of requirements	* Minor Safety
Problems to deal with	* Potential legal risks * Improve minor Digital Wellbeing
Expected returns	* Brand perception improvements * Positive Media Coverage

Intro & Goal

What are we building?

Roll out restricting push notifications to TikTok users younger than 18 (based on Age Gate) at night to ROW.

Feature 100% launched in EEA/UK/CH/US on 10/27/2021, Regional release PRD:

[[HYPERLINK "https://bytedance.feishu.cn/wiki/wikcn5Gu69Ijx9QiXBsce120tVc"](https://bytedance.feishu.cn/wiki/wikcn5Gu69Ijx9QiXBsce120tVc) \h]

1. For users aged 13-15, we **do not** send any push notifications from 9pm to 8am the next day
2. For users aged 16-17, we **do not** send any push notifications from 10pm to 8am the next day

Why build it?

Redacted - Privilege

Redacted - Privilege

In addition to disrupting the necessary ~8 hours of sleep teens need, research has found that the compulsion to react to notifications at night can result in lower quality sleep.

This impacts our minor users significantly when coupled with the fact that they are still developing impulse control and executive function and may struggle to restrict themselves from night-time phone use.

[HYPERLINK "https://bytedance.feishu.cn/docx/doxcnu4alJp88VWd4wIEFcGxUk" \l "doxcnoKcuoWmY2U2aAdTPcVwWSd" \h]

2. Positive results from regional launch (to be updated with data from DA)

This feature is fully launched in EEA/UK/CH/US for 7 months, comparing regions with this feature with regions that don't we see:

1. *Reduced night-time app opens*
2. *Reduced night-time session durations*

Success Metrics

Category	Events	Expected Outcomes
Core	1. Push notifications sent (push_send) during restricted times	None for U18
	2. Push notifications displayed on clients (push_receive) during restricted times	None for U18
	3. Push notifications clicked on clients (push_click) during restricted times	None for U18
Secondary*	1. App Open (During Restricted Times)	Decrease for U18
	2. Session Duration (During Restricted Times)	Decrease for U18
	3. Total App Time / Day	Decrease for U18

Commented [1]: I really appreciate these secondary metrics as an added level beyond what's in the initial PRD. Thanks for including! For #1, are you thinking # opens overall? # opens during the no-push time? % of daily opens happening in no-push time? I think the desired outcome regardless is the same (decrease), just curious methodology. For #3, I think there's mixed research on whether total app time per day is necessarily negative. I'm wondering if this is a metric that we're okay with either holding steady OR decreasing, as long as #1 and #2 in the restricted time is decreasing.

Commented [2]: @Christina Crimmins Glad they're getting a positive response :) I've clarified in the table but the intention is reduce App Open events during restricted times. That said, it'd still be a good metric to watch to see if users are increasing daytime use. The App Time / Day metric in a related way is there to also keep an eye on a counterswing to more activity during the day. It's unlikely this feature alone is going to have a huge impact but I'd like to set precedent that as we move to reduce U18 app usage at night we see if more daytime use and more overall use happens as a result.

Christina Crimmins : [THUMBSUP] 2022-07-12 04:06:25

* More secondary indicators may be added per advice from UG

Requirement Detail

We are currently not sending **strong-reach and must-reach** push notifications to **ANY USER** from **midnight to 8am** the next day.

1. **User groups:** age gate 18- users
2. **Time push notification not sent configuration**

Target user/目标用户	Configuration/配置逻辑
Age gate 13-15 users	No push notifications sent from 9pm and 8am the next day ([9pm-8am]) Must-Reach and Strong-Reach categories will be delivered once restriction is lifted. Limited-Reach category will not be delivered.
Age gate 16-17 users	No push notifications sent from 10pm and 8am the next day ([10pm-8am]) Must-Reach and Strong-Reach categories will be delivered once restriction is lifted. Limited-Reach category will not be delivered.

Commented [3]: Why we consider the same strategies for Must-Reach and Strong-Reach notifications? So we won't allow any push notifications to be delivered in the night, even though it's a Must-Reach category notification.

Commented [4]: @Yiduo ZhouFor this PRD we don't want to change any logic and just roll out the existing rules already available in EEA/UK/US/CH.

Commented [5]: @Jordan Furlonghere is the logic for what notifications should be bundled and sent in the morning.

3. **Notification Categories**

Commented [6]: @Amanda Hanna

Category	Definition	Example
Must-reach / 必达	Time-sensitive, important messages that will either result in immediate action by the user or will impact the users ability to use the product. <u>适用于必须极短时间触达用户, 如无法及时收到推送周知会引起用户即时反馈、或影响后续产品正常使用的高优通知</u>	1. Key messages related to corporate strategy and branding such as <i>TikTok will stop service in X market</i> / 关系公司战略、影响平台形象的核心通知 (TT 某市场停止运营通知) 2. Key account updates such as <i>prize winning or Direct Messages</i> / 账号的通知服务信息 (中奖通知、私信提醒)

Strong-reach <i>强触达</i>	Messages that are directly triggered by the user's own actions, interactions between users where the user expects to be notified, or global campaigns. <i>适用于由用户自身动作、用户间互动动作直接触发且用户期待被通知的场景；或 S 级重要活动一次性通知场景</i>	1. <i>Follows/关注</i> 2. <i>Like/点赞</i> 3. <i>Comment/评论</i> 4. <i>Global campaign (Ed sheeran Live)/全球级运营活动</i>
Limited-reach <i>弱触达</i>	Low priority messages that are triggered by platform's recommendations, non-user actions, or other push scenarios that are not directly related to the user. <i>适用于由平台主动推荐、非用户互动行为触发的弱时效推送场景，且未下发不会引起用户感知和报错的推送场景</i>	1. Operational and personalized pushes /平台热门推送（个推） 2. <i>People who I follow start live streaming or publish a new post /关注人发文推</i>

A/B Testing Setup

Group	Traffic Allocation	Key Hypothesis	Treatment (what's different)	Design
v1 (Control)	90%	control	Feature not activated	
v2 (test)	10%	Reduction of night-time screen time.	Feature activated	Replicate regional release A/B test design: https://libra-sg.bytedance.net/libra/flight/70091646/report/main#TC-31051

Commented [7]: A/B Test config in next week. <att@Xinrui Zhou

Checklist

Please fill in column C and F if applicable.

[sheet-shtcn3k5PHI127Hebeq75UPtSMd_hgkKnU]

Appendix

Research Studies and Results

[HYPERLINK "<https://www.sciencedirect.com/science/article/abs/pii/S2352721822000158>" \h] surveyed "84,915 pre-adolescent (8-11 years), 99,680 early adolescent (12-14 years) and 67,600 late adolescent Australian children (15-18 years)" to find how frequently they obtained 8 hours of sleep on most nights and if they used their mobile phone at night to send and receive messages between 10 PM and 6 AM. They discovered that "for all age cohorts including pre-adolescent children, mobile phone use at night was associated with lower odds of obtaining 8 hours of sleep on most nights."

[HYPERLINK "<https://www.tandfonline.com/doi/abs/10.1080/15402002.2015.1120203>" \h] found that "Greater number of daily texts, awareness of nighttime cell phone notifications, and compulsion to check nighttime notifications were significantly associated with poorer subjective sleep quality. Awareness of nighttime notifications was significantly associated with higher self-reported global sleep problems and more sleep disruptions."

[HYPERLINK "https://www.rcpch.ac.uk/sites/default/files/2018-12/rcpch_screen_time_guide_-_final.pdf" \h] has written about the health impacts of screen time and writes: "Even quite modest sleep deprivation can interfere with mental and physical health, educational success and family relations. Is it important, therefore, that screens do not interfere with a good bedtime routine, either for children or adults, and we would adopt the expert recommendation that screens are avoided for an hour before the planned bedtime... so that their brains have time to wind down for sleep without the stimulation from the light of the screen (and the content being viewed)".

The [HYPERLINK "<https://www.nhs.uk/live-well/sleep-and-tiredness/sleep-tips-for-teenagers/>" \h] and the [HYPERLINK "<https://www.sleepfoundation.org/how-sleep-works/how-much-sleep-do-we-really-need>" \h] each recommend that teenagers need a minimum of 8-10 hours a night.

Additionally, we need to consider that teens struggle with setting this boundaries themselves and are likely to react when prompted with a push notification during this critical time.

This can be demonstrated by a [HYPERLINK "<https://5rightsfoundation.com/static/5Rights-Disrupted-Childhood.pdf>" \h] in 2018 found that children's predilection to seek immediate gratification makes them particularly susceptible to habit-forming rewards. This makes it difficult for them to ignore the prospect of a dopamine reward, even when this conflicts with other essential daily activities, such as sleeping or eating. It concluded that constant summons creates an exhausting level of demand that exploits a child's human instinct to respond.

Offline Approval

[jsv-该内容的内容暂不支持下载]

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