

## **AMENDED Exhibit 603**

# **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-Medoff

4

5/20/2025 - MOP



# TikTok Online Panel

SUMMARY OF FINDINGS

JULY 2020

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# Objectives

1

To understand how phone use impacts on bedtime routine/sleep time, explore how this feels for children and ask parents what they want TikTok and other social media companies to do to help

2

To understand safety information seeking – where do people go for information nowadays and in what format? Is there a generational difference between children and their parents? What can TikTok learn from this?

3

To test how easy it is to find TikTok safety information on the app. How does this compare to finding it on Google? What do TikTok need to do to make this easier for users and their parents?

4

To collect opinions, reactions and recall on TikTok safety messaging through light-hearted short-form video clips

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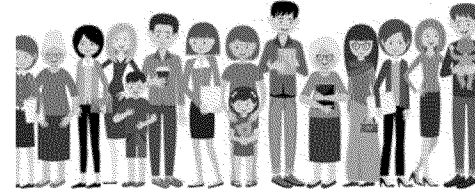
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# Methodology & Sample

| Day 2 (Children)                                                   |    |
|--------------------------------------------------------------------|----|
| Q15. Welcome and introductions                                     | 1  |
| Q16. Next, let's go into a bit more detail on any changes in yo... | 2  |
| Q14. If you DON'T use TikTok...                                    | 3  |
| Q15. Phones and Bedtime - Reporting Back                           | 4  |
| Q16. Did you take your phone into your bedroom last night? L...    | 5  |
| Q17. Did you take your phone into your bedroom last night? L...    | 6  |
| Q18. Phones and bedtime                                            | 7  |
| Q19. TikTok Video clip a                                           | 8  |
| Q20. TikTok video clip b                                           | 9  |
| Q21. TikTok video clip c                                           | 10 |
| Q22. TikTok video clip d                                           | 11 |

| July 2020 |     |     |     |     |     |     |
|-----------|-----|-----|-----|-----|-----|-----|
| Sun       | Mon | Tue | Wed | Thu | Fri | Sat |
|           |     |     | 1   | 2   | 3   | 4   |
| 5         | 6   | 7   | 8   | 9   | 10  | 11  |
| 12        | 13  | 14  | 15  | 16  | 17  | 18  |
| 19        | 20  | 21  | 22  | 23  | 24  | 25  |
| 26        | 27  | 28  | 29  | 30  | 31  |     |



## 5 day online platform

- 30 minutes a day
- Parents contributing for 2 days
- Children for 3 days

## 16-20 July 2020 inclusive

- Thursday to Monday
- Parents day 1 and 5
- Children days 2, 3, 4

## Same parents and children from the previous phase

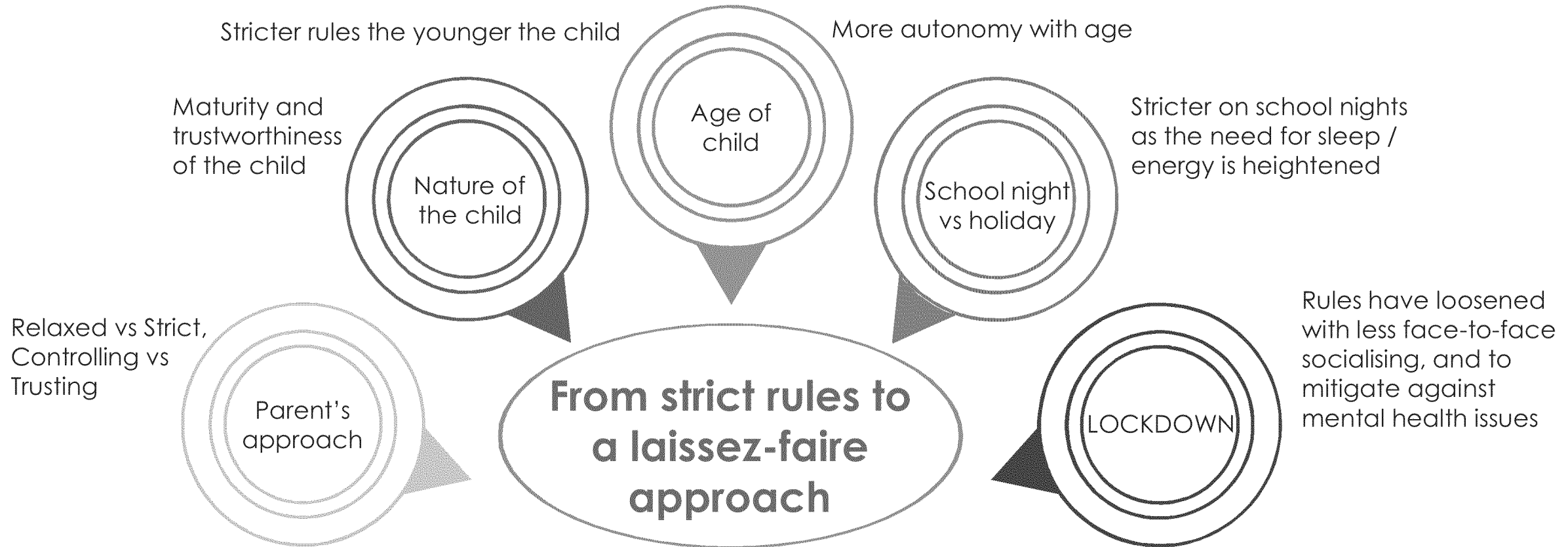
### Originally recruited as:

- Majority with children who use TikTok
- Mix of mums and dads, boys and girls
- Age range 11-16 (users of TikTok) and 11-13 (non-users of TikTok)
- Geographic spread
- Mix of SEG, ethnicity, age

## End of project stats:

- Number of participants:  
20 adults  
20 children
- Number of responses:  
1083

# Late-night phone use is influenced by a number of factors:



Parents who lay down the rules early on claim to have fewer ongoing battles with phone use. As precious commodities, phones are used as an effective bargaining tool for good/bad behaviour – this can entail confiscation in the evening

# Phones at bedtime: the parent's tension

*I want to give my child the freedom to use the phone as he / she wants*

*I believe it's important to take a break from phones, especially late in the day*



*100% conflict – no two ways about it - Aiysa*

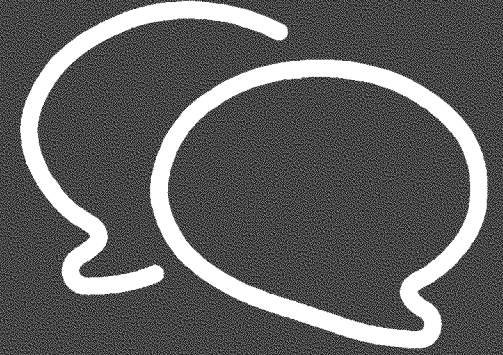
- Allows them to connect / socialise
- Not missing out
- Having fun, relaxing
- Learning/ pursuing hobbies
- Being creative

- To wind down
- For better sleep (prolonged screen time is considered a hinderance)
- More energy
- Better mood
- To encourage other activities, inc. more family interaction

Parents say phone use can often be a source of conflict, because children often fail to appreciate of the need to take a break, get sufficient sleep or pursue alternative activities. However, over half of children say they agree with their parents' approach

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# Phones at Bedtime (Parents)



*Phones at bedtime have never been an issue as we have a strict no phone in bedroom at bedroom rule, and time phone is switched off when downstairs prior to bed - Mandie*

*I am confident that he can self regulate – Jill*

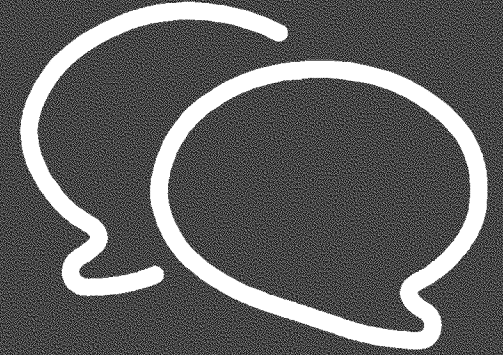
*Yes always! Trying to get to bed and her off the phone by certain times always cause a fuss! - Paul*

*If ground rules are set from the off then it eases the conflict - Kirsty*

*I've let this slip recently and trying to reinforce no phone rules is a source of conflict - Debbie*

*It's too much a distraction they would use it way pass bedtimes so sleep less and be more ratty which would effect our relationship - Rahila*

# Phones at Bedtime (Child)



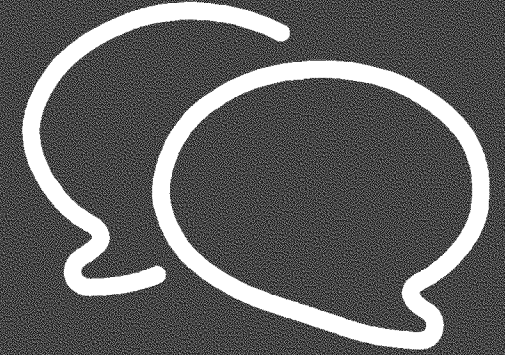
*I think that you should be able to use [phones] as much as you want and if that affects your sleep you are going to learn from that. My parents think you just turn your phone off and then you are going to sleep - Girl, 13*

# Many children agree it can be difficult to turn phones off



- Children who are subject to rules are more resigned to fact they can't use their phone late at night
- There is a mix of opinions among those who take their phones to bed. Some claim it's easy to put the phone down or to turn it to silent
  - Although given how late these children go to bed, this may be an overclaim
- For others, it's a challenge - something they don't want to do even if they know they should
- Late evening is a time of high social media / messaging activity in this age group. Many describe how communications carry through to the early hours. It feels like a wrench to have to 'leave the party', especially when the messages are flowing
- And when you know there's a notification you want to know what it is
- It's difficult to stop the fun and the resist the compulsion to 'keep at it': some describe how they 'get stuck' on apps such as TikTok
- And if you don't have your phone you end up bored
- Another reason for not wanting to put phones down is that they can work as a sleep-aid for some children, helping them to wind down
- Also, can be a form of reassurance – a means of communication if something bad happens (older girl, suffers with anxiety)

# Turning off phones (Children) 1



*I don't have trouble putting it down, I just  
don't want to – Girl, 13*

*I get annoyed – Girl, 13*

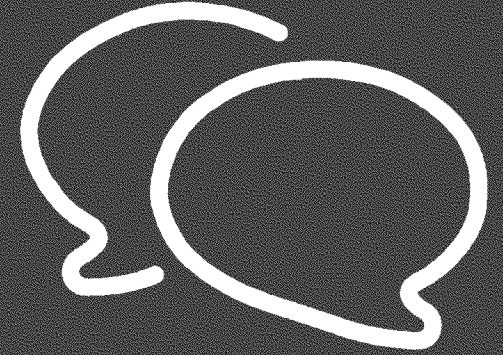
*Difficult cos your friends are texting or  
messaging you you don't want to feel left  
out – Boy, 13*

*If you are not tired and there is stuff to do  
then why would you lie in bed and be  
bored – Girl, 13*

*I do want to stay up most nights – lots of  
notifications overnight, I want to see them –  
Girl, 14*

*It's true as lots of notifications keep coming  
through. Sometimes I'm tired and don't  
want to answer messages but I feel I need  
to – Girl, 12*

# Turning off phones (Children) 2



*Teenagers are more awake at night time,  
lots of things happening – Girl, 13*

*You get into a hole that you can't turn off as  
there is more than you want to watch – Girl, 16*

*If you get a notification from YouTube or  
TikTok it makes you interested to see what it  
is – Boy, 13*

*Using my phone makes my eyes sleepy, so I  
go to sleep more easily – Boy, 13*

*You want to know what people say, you  
want to socialise and talk to people and  
know what the notifications are about – Girl,  
13*

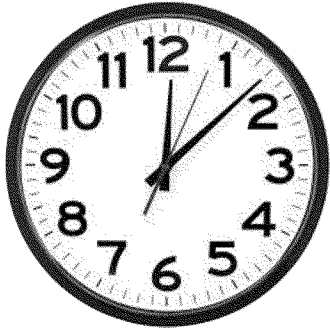
*I have anxiety sometimes that something is  
going to happen and I'll miss it if my phone is  
not on – Girl, 16*

# Three approaches to bedtime exercise

As part of the research, the children were all asked to try three different approaches to bedtime over 3 evening and report back:

- 1 Follow your usual routine and use your phone as you normally would
- 2 Keep your phone ON (NOT set to silent / with notifications turned ON) and keep it with you until sleep time
- 3 Turn your phone OFF (with NO notifications) for a whole hour before bedtime and to keep it off until the next morning

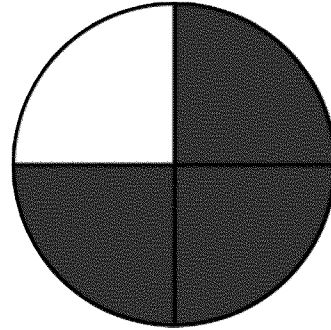
# Evening 1: A 'normal' night (during lockdown\*)



## 9.30pm – 2am bedtime

Over a third went to bed at midnight or after (including several 13-14 yr olds)

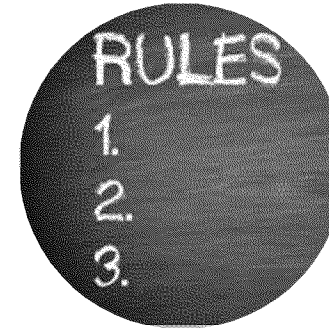
Regular school nights involve bedtimes between 9-11



## Three quarters took their phones into their bedroom

However, most were on silent with parents trusting their children to do this

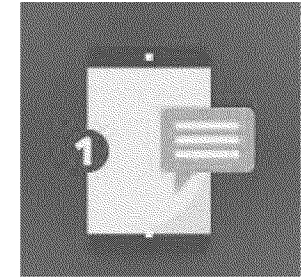
Phones are often used as an alarm – so they need to be within earshot



## Half said there were NO rules at all regarding phones in the bedroom

The other half had a curfew on phones between 9pm and midnight – often an hour, or half-hour before it was time to sleep

Regular school nights involve earlier phone curfews – at bedtime, or 30-60 minutes before



## 1-145 notifications received between 8-10pm

Over a third were receiving notifications midnight or beyond (13yrs +)

But only until 6-7pm for one 15 yr old boy

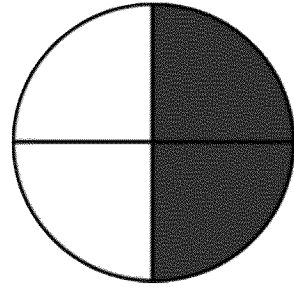
\*does not reflect a 'normal' school night, as rules have been up-ended

# Evening 2: Keeping phones ON



## **2 didn't manage it**

It made going to sleep too difficult



## **This is usual behaviour for just over half these children**

Even where this is normal, some negatives are reported: notifications distracted them while watching a film, stopped them going to sleep, woke them up, buzzes were 'annoying'.

But mostly, phones kept these children entertained and connected, with few issues going to sleep



## **For those unused to phones buzzing at night, there were various negatives reported (esp by 12-13 yr olds):**

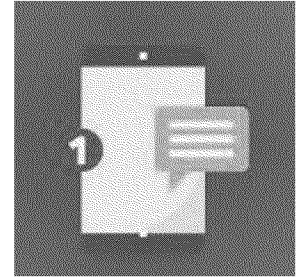
Very distracting – couldn't enjoy other pursuits, couldn't switch off

No boundaries so stayed up late (on TikTok)

Slept less, lower energy the next day

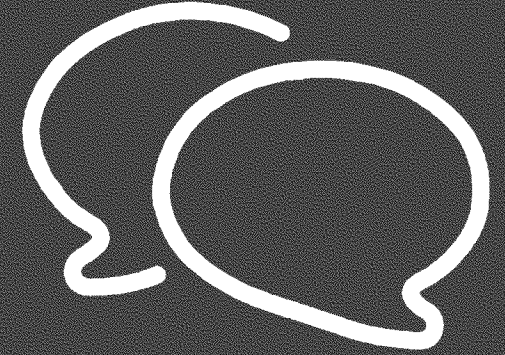
'Annoying,' 'unenjoyable' 'weird'

The only positives noted by these children were that there were fewer notifications to deal with in the morning and - for one - that it made him feel more 'grown up'



**0-107 notifications received between 8-10pm**

# Phones ON at bedtime – The negatives (Children)



*Weird and I didn't like it – unenjoyable and annoying – Girl, 13*

*Mind-blowingly distracting - Boy, 13*

*It did stop me going to sleep when I was ready because I felt the need to check and answer – Girl, 12*

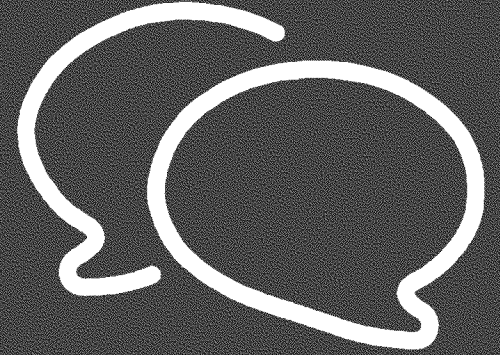
*As I was trying to fall asleep I got a notification from one of my friends so that slightly woke me up as I felt like I needed to check it – Girl, 14*

*It did affect my sleep because the notifications and vibrations were quite loud and hard to ignore. In the morning I didn't really have as much energy as usual because of this – Girl, 13*

*It did affect me going to bed as I lost track of time and went to bed at 2am while watching tiktok– Boy, 13*

*When I went to bed it was very distracting so I turned my phone onto silent – Girl, 13*

# Phones ON at bedtime – The positives (Children)



*It entertained me before I went to  
sleep – Girl, 16*

*I had more time to catch up with  
notifications and in the morning I had less  
notification banners on my lockscreen  
than I normally do – Girl, 13*

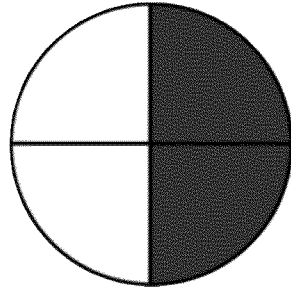
*Tbh I felt more grown up - Boy, 12*

# Evening 3: Keeping phones OFF



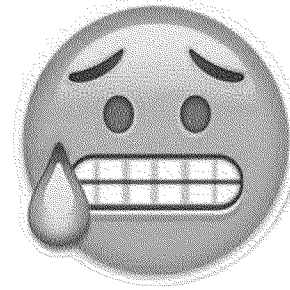
## 4 didn't manage it

Playing a game with friends = couldn't miss out  
Group chat with friend in France = didn't want to miss it  
Couldn't help but check periodically  
Arranged to watch a film over FaceTime with a friend = didn't want to let her down



## Normal behaviour for just under half our sample

Where this is usual behaviour, no issues arose: *'it's just normal'*

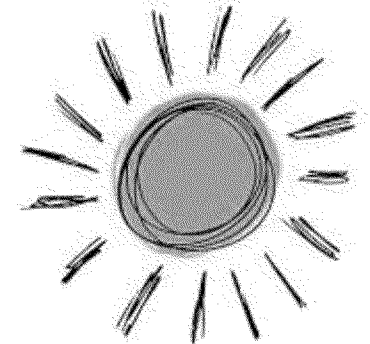


**Provoked some feelings of anxiety and discomfort** – wondering who had messaged, FOMO, feeling rude by not responding, it means can't be there for your friends

For a few, it took longer to go to sleep due to this induced anxiety, or because phones usually help them wind down

Some said they were bored

Some strong language: 'hated it', 'annoyed', 'it was weird' 'difficult'



Yet **all but two acknowledged some positive outcomes:**

Better sleep (earlier, less disturbed, woke up later)

It was peaceful, calm

Pursued alternative activities (see following slide)

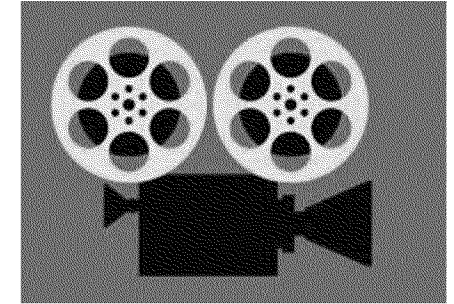
# Alternative pursuits when not on phones in the evening:

*Family Time*

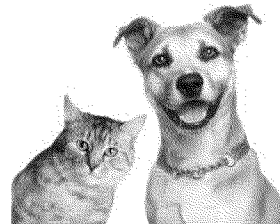
Spending time with family / talking

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Sleeping



Watching a movie, TV, documentary



Spending time with pets

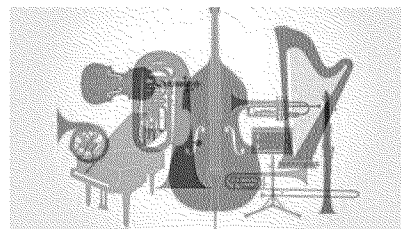


Playing games inc. Roblox

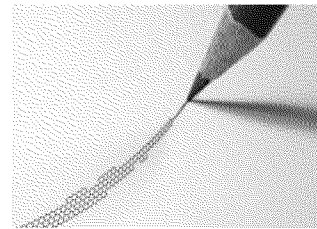
*Some ME Time*

Time to myself

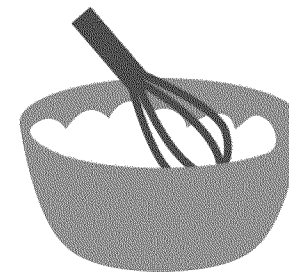
Also, **projected** that they would spend time doing the following:



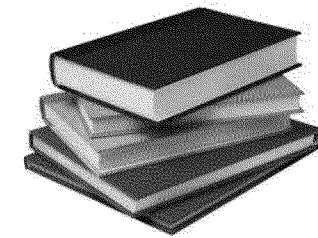
Practicing music



Drawing



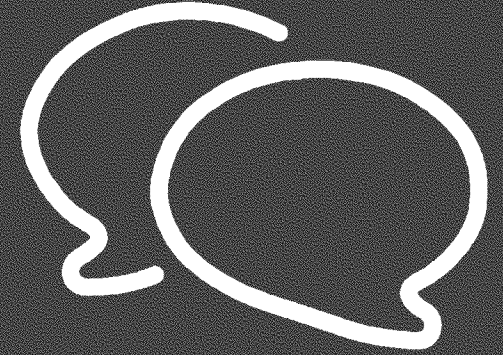
Cooking



Reading

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# No phones at bedtime – The negatives (Children)



*Really weird for me, as I always have my notifications on. I hated it and felt like I was missing out, as I couldn't reply to any messages. I really didn't like it at all – Girl, 14*

*I was bored – Boy, 13*

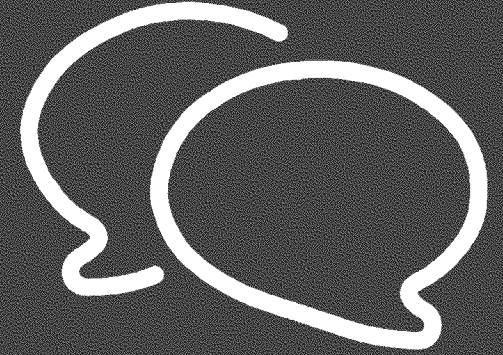
*I feel like I'm missing out and I feel bad when I don't reply to people – Girl, 14*

*You might miss important info about something you and your friends are doing like going out or something – Boy, 13*

*You aren't able to check up on your friends when they might need **you** in that point in time- - Girl, 14*

*There is absolutely **nothing** wrong with not being able to read or respond to messages late at night – Boy, 14*

# No phones at bedtime – The positives (Children)



*My mind is calmer - Girl, 12*

*It allows your brain to slow down and go to sleep – Girl, 16*

*By me not being on my phone I was speaking to my dada and sister more – Girl, 14*

*If I were to turn my phone off most evenings, I would have more time to do productive things, such as practising music more often – Girl, 13*

*The blue light effects your brain and keeps you awake longer – Boy, 12*

*There is absolutely **nothing** wrong with not being able to read or respond to messages late at night – Boy, 14*

*I spend more time with my family, watching family movies, talking to my mum, using my time differently, like drawing, playing games, cooking – Girl, 12*

*I turned my attention to something else, made me realise I don't need my phone on all night - Girl, 12*

*I played with my dog more and watched some good Will Smith movies without being disturbed- Boy, 12*

*It is quite refreshing - Girl, 12*

*Makes you more present – Girl, 14*

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# The bedtime experiment: a parent's view

**Dear Tik Tok,**

*The experiment was reassuring.*

**When phones were kept on** *the negatives were increased phone use and distractions.*

**When phones were left off** *the positive outcomes were a more sociable daughter who chose to go to bed when tired, not being told to by parents.*

*My child felt somewhat aggrieved, but this isn't new and can often be the source of argument or sulks and unpleasantness. And I feel that I need to find a way to ensure the expectation is met without it becoming combative.*

**I would like your company** *to limit use for under 16s to 9pm.*

*Overall I learned that my daughter isn't able to stop her phone use without direction and that I probably could find a better way to get her to stop.*

*Yours sincerely  
Sarah (daughter to a 13 yr old girl)*

# Almost two-thirds of children say there should be a cut off time for phones in the evening

**yes!**

**(Around two thirds say yes: even spread of age and gender)**

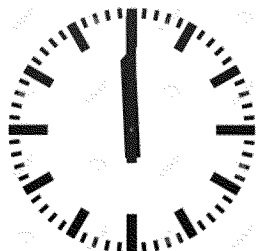
- Because taking a break is important
- Because it can overstimulate your brain
- To relax
- To read before bed
- Give your mind chance to wind down before sleep
- So phones don't distract you from going to sleep
- To not be tired the next day at school

**No!**

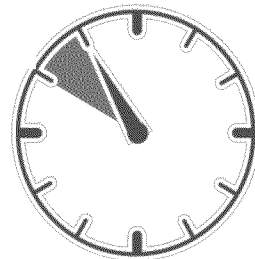
**(Around one third say no – mostly girls, aged 12-16)**

- Children should take the responsibility
- You need to learn to manage this
- We are mature enough to know when enough is enough
- Everyone is different, has different standards
- With my generation, everything involves technology
- Because most notifications come then!
- You can always sleep in the next day – if it's the weekend/holiday

**What's  
considered  
reasonable?**



Midnight on  
weekends /  
holidays

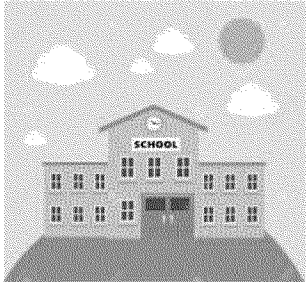


10-11pm on  
school nights  
(8-9.30 for some  
12-13 yr olds)

For some, it's  
about taking a  
30-60 min break  
before bedtime

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# According to children, a reasonable number of hours on your phone per day is...



## School days

**3.5 hours**, on average, is considered reasonable

4 out of 20 children say there should be NO limit, even on school days, as long as your school work is complete (all girls, aged 13+)

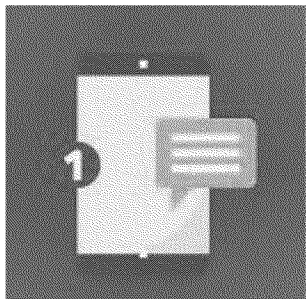
One boy claimed to be on his phone 6-7 hours



## Weekends and holidays

**5.5 hours**, on average, is felt to be reasonable

Half the children felt there should be NO restrictions on number of hours on these days (no significant differences by age or gender)



**A reasonable cut off time for notifications** (of those who express an opinion) is considered to be between:

**8-9 pm** (12 yr old girl) to **midnight** (16 yr old girl) with **10-11pm** the most common.

Many are happy to receive notifications throughout the night if their phones are to silent – ready to be checked as soon as they wake up

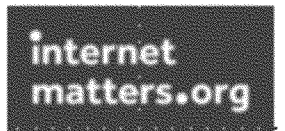
# Bedtime - What children want

## **Half the children do NOT believe social media companies should help (intervene) with evening phone use**

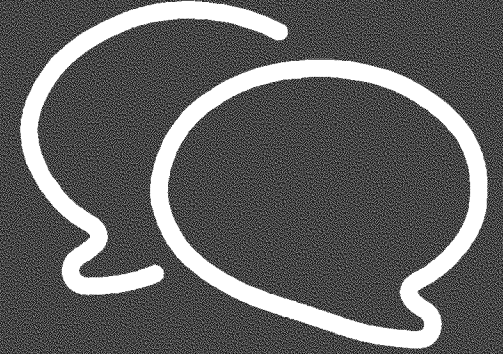
- They do not necessarily see anything wrong with their current behaviour
- Or if they do acknowledge the challenges, they want to take responsibility themselves / negotiate this with their parents
- There are already a number of apps to limit screen time, should you want to (one spoke highly of Forest, which incentivises you to turn screens off)

## **Others were more open to the idea that social media could help:**

- Mostly this was about gentle encouragement to take a break via pop-up reminders or messages (this had worked already for one TikTok user). This could involve a reminder of how long you've been on an app / on your phone, information on how phones can affect sleep, energy and mood, communicating the importance of taking a break, encouraging you to eat etc.
- Another suggestion was for a 'downtime mode' where content is more muted and relaxed e.g. to wind down before bedtime
- Two suggestions for imposed cut-off times for messages and notifications – although one admitted she would accept this reluctantly – something her mother would approve of more than her



# Bedtime - What children want



*I don't think they can because in my opinion there is nothing wrong with leaving your phone on – Girl, 13*

*They could pop up messages to say - you have been on this app for a certain amount of time e.g. (hours) you need to take a break – Girl, 12*

*There was one ad on tiktok which said about your eyes being tired and you need to take a break - it reminded me that I had to get some sleep because sometimes you get carried away – Boy, 13*

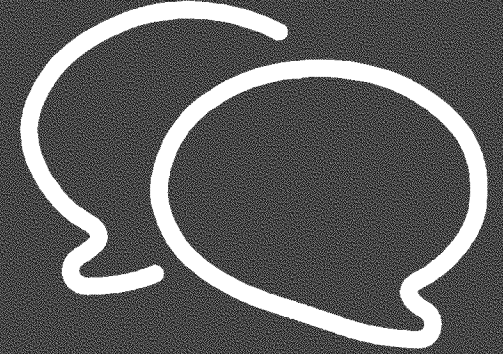
*They could help by a setting on an app to say every hour to say to take a break or drink or eat some food – Boy, 12*

# Parents would like to see more support from TikTok and SM companies

Even after our 3 stages of research many parents seem unaware of settings that exist to help with this

- **Half the parents in our sample say they want their children to have limited access to TikTok after a set amount of time / after a certain hour**
  - Parents of both girls and boys, ages 13-16
  - Some request this as a setting
  - Others want this to be imposed by TikTok so that everyone plays by the same rules and no child can bypass settings - i.e. cut off the app after a certain hour (9pm for 13 yr olds was suggested by one mother) or lock out users who reach their daily limit
- **Pop-up messages for users are well liked and parents want more of them:**
  - Encouraging users to turn phones off and to rest their eyes / mind
  - Reinforce the positive elements of downtime, the importance of rest and sleep
- **Notifications to tell children how long they've been on the app / countdowns to cut-off times**
- **Notifications from TikTok to parents**
  - If a child is on his/her phone late at night (or have some way of knowing when a child was last active - like WhatsApp)
  - Warning of any negative behaviour
- **Suggested times for switching off gadgets, by age**

# Bedtime - What parents want



Social media should play their part in helping somehow. Obviously it is also the parent's responsibility for their child/ren. However, they have the technology and know-how to be able to build-in pop up messages, timing out countdowns to prompt well being, time to get some rest and sleep. At the end of the day, they do have quite a lot of influence on the young users and if consistent some/most would listen – Sarah C

The time limit really helps on tik tok. Could these sites cut people off on a time limit?- Sarah H

would be good if we could set **curfews** on the apps so they become inactive after that until the time set the next day - Kirsty

regular notices of bedtime is near and suggest good idea to turn phone off in order to get restful sleep, and this be done according to child's age – Mandie

I think they could help in promoting switching off from technology times, importance of physical exercise to give brain a rest- Leanne E

encourage down time via pop ups or a change in pace of the videos. So the content could change to videos focusing on mindfulness or bedtime stories etc - Gemma

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