

AMENDED Exhibit 619

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

Geoffrey M. Drake, *pro hac vice*
TaCara D. Harris, *pro hac vice*
King & Spalding LLP
1180 Peachtree Street, NE, Suite 1600
Atlanta, GA 30309-3521
Telephone: (404) 572-4600
Facsimile: (404) 572-5100
Email: gdrake@kslaw.com
tharris@kslaw.com

Attorneys for Defendants
TikTok Inc., ByteDance Inc., TikTok Ltd.,
ByteDance Ltd., and TikTok LLC

Additional counsel listed on signature page

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-md-03047-YGR

MDL No. 3047

**THE TIKTOK DEFENDANTS’
OBJECTIONS AND SUPPLEMENTAL
RESPONSES TO PLAINTIFFS’
FOURTH SET OF
INTERROGATORIES**

THIS DOCUMENT RELATES TO ALL
ACTIONS

PROPOUNDING PARTY: PI and SD Plaintiffs

RESPONDING PARTIES: TikTok Inc.; ByteDance Inc., TikTok Ltd., ByteDance Ltd.; and TikTok LLC

SET: FOUR

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]

6 **INTERROGATORY NO. 10:** For each Named Feature, identify the following: (i) the date
7 on which the Feature was first implemented on Your Platform; (ii) the Person(s) with primary
8 responsibility for the Feature during each year of the Relevant Time Period; and (iii) major
9 modifications to each Named Feature and when each such modification was implemented on Your
10 Platform. For purposes of this Interrogatory, “major modification” means any change that
11 materially improves and/or alters the source code, capacity, functionality, and/or the method of
12 operation.

13 **Objections:** The TikTok Defendants object to this Interrogatory as compound and to the
14 extent it seeks discovery that is inconsistent with or enlarges the scope of permissible discovery
15 under the Federal Rules of Civil Procedure and/or applicable local rules. The TikTok Defendants
16 object to this Interrogatory as overly broad, unduly burdensome, disproportionate to the needs of
17 the case, and seeking information that is not relevant to any party’s claim or defense because it
18 seeks information without regard to time, place, or a user’s age. The TikTok Defendants object to
19 this Interrogatory as overly broad, unduly burdensome, and disproportionate to the needs of the
20 case to the extent it requires the TikTok Defendants to extract or recover data that is not reasonably
21 accessible or would require extraordinary costs and efforts to retrieve. The TikTok Defendants
22 object to this Interrogatory because of its use of the terms Named Feature, Your Platform, and
Person for the reasons stated *supra*. The TikTok Defendants object to this Interrogatory as vague

1 and ambiguous because Plaintiffs' instructions include two different definitions of "Relevant Time
2 Period" and it is unclear which definition Plaintiffs seek to apply here. The TikTok Defendants
3 object to this Interrogatory as vague and ambiguous because of its use of the phrases "first
4 implemented", "primary responsibility", "materially improves", "alters the source code",
5 "capacity", "functionality", and "the method of operation"; these phrases are vague and ambiguous
6 because they are undefined and therefore subject to different meanings. The Interrogatory therefore
7 fails to describe with reasonable particularity the information sought. The TikTok Defendants
8 object to this Interrogatory as overly broad, unduly burdensome, disproportionate to the needs of
9 the case, and inconsistent with the scope of permissible discovery under the Federal Rules of Civil
10 Procedure and/or applicable local rules because it asks the TikTok Defendants to provide a separate
11 answer "For each Named Feature" with additional separate answers for "each year of the Relevant
12 Time Period" which creates multiple "new discrete subparts" within each Interrogatory, per Fed.
13 R. Civ. P. 33(a)(1). The TikTok Defendants' discovery obligations are limited by principles of
14 reasonableness and proportionality. The TikTok Defendants also object to this Interrogatory to the
15 extent it seeks materials or information barred from use at trial under Fed. R. Evid. 407.

14 **Supplemental Answer:** Subject to these Objections and Objections to Definitions above,
15 the TikTok Defendants' responses below reflect the current state of their knowledge and
16 information gained through a reasonable investigation in this action regarding the information
17 Plaintiffs have requested. The TikTok Defendants' investigation and discovery in this action are
18 ongoing, and they continue to evaluate what information may exist, how far back it is kept, and
19 what burden may be associated with answering this interrogatory and producing information, to
20 the extent it exists.

20 **1. Age Verification:** Age verification has been implemented on the TikTok Platform

1 since its launch in the U.S. The TikTok Platform employs an industry-standard
2 neutral age gate that is consistent with the Federal Trade Commission’s (“FTC”)
3 guidance under the Children’s Online Privacy Protection Act (“COPPA”) Rule as a
4 method of age assurance. The neutral age gate occurs during the account creation
5 process when a user inputs a date of birth. In the U.S., if an individual provides a
6 birthdate that corresponds to an age under 13, they are directed to the TikTok
7 Platform’s under 13 experience. Users aged 13–15 are classified as “early teens,”
8 and users aged 16–17 are classified as “older teens.” Between the two groups, early
9 teens will have more default privacy settings and protective limitations. TikTok has
10 made several modifications to its age protection processes since 2017. For example,
11 once a user is on the TikTok Platform, TikTok uses technologies and human
12 moderators, as well as user and third-party reporting, to detect and remove accounts
13 that violate the Platform’s minimum age requirement. TikTok uses technology, such
14 as a natural language processing model that detects text in a user’s bio for indicators
15 that the user may be underage. TikTok has implemented features and processes to
16 allow users or third parties to report accounts as being underage. An account that is
17 identified as being potentially underage is then routed to a dedicated team of
18 moderators who review the account to determine if it should be banned for not
19 meeting the minimum age requirement. TikTok moderators review various sources
20 of information, including videos, LIVE replay (including audio therein), and visual
21 signals in other content (such as a user’s profile image) as available to identify
22 individuals who may be underage. A user whose account is banned for being
suspected as underage may appeal the ban. The appeal process requires the user to

1 submit proof of age by providing either a selfie photo holding a government-issued
2 ID and a unique number provided by the TikTok Platform or a valid credit card, or
3 to ask a validated adult, parent, or guardian to validate their age (limited to 13-17
4 year old users). The TikTok Platform uses its human moderators and Yoti to review
5 the information provided via selfie method; Jumio, a third-party, to verify the
6 authenticity of government-issued IDs; and Stripe to verify credit card information.
7 The use of Yoti for age appeals began in the U.S. in November 2023.

8
9
10
11 2. **Algorithmic Recommendation:** The development of the TikTok Platform's
12 recommendation system is an ongoing process, constantly evolving through the
13 refinement of models and reassessment of influential factors based on user feedback,
14 research and data analysis. For a description of the recommendation system, the
15 TikTok Defendants refer Plaintiffs to their Objections and Supplemental Responses
16 to Plaintiffs' Fifth Set of Interrogatories.

17
18 3. **Default Protective Limit:** The Default Protective Limit feature has a number of
19 different limitations incorporated, including but not limited to:

20 a. Direct Messaging Age Threshold: Only users over the age of 16 are able to send
21 and receive Direct Messages on the TikTok Platform. This feature was
22 implemented in approximately April 2020. This age threshold has not been
modified since its implementation.

b. Go-LIVE Age Threshold: Only users over the age of 18 may go LIVE on the
TikTok Platform. This feature, which originally set an age threshold of 16 to go
LIVE, was implemented in approximately December 2019. The age threshold
was later changed to 18 years old in approximately November 2022.

- 1 c. LIVE Gifting Age Threshold: Prior to December 2019, users 14 and over could
2 send virtual gifts, and users over 16 could receive them. In December 2019, the
3 TikTok Platform updated its virtual gifting policy to only allow those users 18
4 and over to purchase, send, or receive virtual gifts on the TikTok LIVE Platform.
- 5 d. View-LIVE Traffic Restriction: When content containing mature or complex
6 themes is identified in a LIVE stream, the LIVE stream is not recommended for
7 users under the age of 18. This feature was implemented on the TikTok Platform
8 in approximately October 2023. This age threshold has not been modified since
9 its implementation.
- 10 e. Suggesting Account to Others: By default, this setting is turned off for users
11 under the age of 18. This feature was implemented in approximately January
12 2021.
- 13 f. Video Commenting Restrictions: For users under the age of 16, only friends may
14 comment on their videos. For users ages 16 and 17, other users may comment
15 on videos for public accounts, but only followers may comment on videos for
16 private accounts. This feature was implemented in approximately January 2021.
- 17 g. Mention Threshold: Only friends may mention users under the age of 16.
- 18 h. Video Download Restrictions: Videos posted by users under the age of 16 are
19 not available for download. For users ages 16 and 17, downloads are only
20 available to friends. This feature was implemented in approximately January
21 2021.
- 22 i. Duet and Stitch Threshold: Videos posted by users under the age of 16 are not
able to be dueted or stitched. Videos posted by users ages 16 and 17 may only

1 be dueted or stitched by friends of the user. This feature was implemented in
2 approximately January 2021.

3 4. **CSAM – Reporting Protocols:** TikTok aims to detect, report, and remove
4 CSAM content or accounts through the following methods:

5 a. Proactive Detection Efforts: Content posted to the TikTok Platform goes
6 through technology that reviews the content against TikTok’s Community
7 Guidelines. If the content is identified as potentially violative, it is automatically
8 removed and/or flagged for additional review by moderators. Since 2020,
9 TikTok has implemented National Center for Missing and Exploited Children
10 (“NCMEC”) and the Internet Watch Foundation (“IWF”) hash banks to detect
11 known CSAM, NCMEC and IWF indexing process for faster recall and increase
12 in true positives, keyword and link detection from IWF and other partners to
13 prevent content distribution, Google and YouTube APIs to score CSAM risks,
14 and similarity match upgrade to more broadly identify similar content.

15 b. The initial model trained directly on CSAM detection was developed in 2022.
16 In February 2023, the model was transitioned to a privacy-compliant
17 embedding-based approach, which utilized a domain-specific video embedding
18 framework, pre-trained with classification tasks in adjacent domains to detect
19 CSAM without relying on raw video content. In May 2023, the CSAM reporting
20 model was again enhanced with the Privacy-Preserving CSAM Classification
21 Model to ensure there was no direct linkage to original content or victim
22 identities during training. In June 2024, a Unified Detection Framework was
introduced with the goal of improving detection efficiency and accuracy before

subsequently being retired in favor of the more effective Privacy-Preserving CSAM classification Model.

c. Reporting Protocols: If content posted to the TikTok Platform involves incidents of youth sexual exploitation and abuse, such content may be disclosed to NCMEC in accordance with TikTok's legal obligations. TikTok may also report such incidents to relevant law enforcement authorities when there is a specific, credible, and imminent threat to human life or serious physical injury.

5. **Short-Form and Ephemeral Content**: Users can engage with Short-Form and Ephemeral Content through a number of different features, including but not limited to:

a. TikTok Stories: This feature was implemented in approximately March 2022.

b. TikTok Now: This feature was implemented in approximately September 2022 and discontinued in approximately June 2023.

6. **Friend Recommendation**: This feature launched prior to March 2020. In March 2020, friend recommendations were available in a user's Inbox, on a user's Profile, and on a user's For You Page. In July 2022, the Friend Recommendation Big Card was added to the user's For You Page and Friends Tab. In July 2022, TikTok also introduced a Friend Recommendation pop-up in the user's For You Page. From 2020 to 2024, the Friend Recommendation algorithm was optimized.

7. **Image Filters**: This feature has been available since the TikTok Platform launched in the U.S. The TikTok Platform does not collect any sensitive user data from this feature. While in kids' mode, 99.865% of the image filters are not available.

8. **Family Pairing**: This feature has been available on the TikTok Platform since April

2020. *See also* the TikTok Defendants' response to interrogatory No. 8 above related to safety features, such as Family Pairing and Screen Time Limits, related to modifications to the Named Feature. Modifications and enhancements to Family Pairing have been made over the years, including allowing parents to turn off comments on their teen's videos (November 2020), letting parents decide whether the teen can search for videos, hashtags, and LIVE videos (November 2020), allowing parents to restrict direct messaging for users who are 16 or older (while DM is already turned off for U16 users) (November 2020), allowing parents to create a list of keywords that are used to filter out videos that contain those keywords (February 2023), giving parents access to a screen time dashboard that provides a summary of the teen's TikTok usage, allowing parents to mute all push notifications on their teen's account (March 2023), and providing parents with a weekly summary of their teen's screentime (April 2023).

9. **User-Complaint Protocols:** TikTok introduced its user feedback platform in 2018. There are currently 19 ways a user can report on the TikTok Platform. Specifically, a user can report videos, comments, accounts, hashtags, direct messages, audio, LIVE, LIVE comments, ads, e-commerce, Q&A, search results, effects, shoutouts, third-party anchor reports, photos, LIVE events, and libraries.

10. **Notifications:** TikTok introduced default mute windows for minor users in approximately 2021. Users can set a schedule to mute push notifications on their device for a specific amount of time. For users under 15 years old, push notifications are always muted from 9 p.m. to 8 a.m. by default, and this setting cannot be changed. For users aged 16 to 17 years old, push notifications are always muted

1 from 10 p.m. to 8 a.m. by default, and this setting cannot be changed. Parents and
2 guardians can also schedule additional time to mute their teen's push notifications
3 in Family Pairing. The default scheduled time overrides any custom time. For
4 example, if a parent sets their 13-year-old's scheduled time from 11 p.m. to 7 a.m.,
5 the default time from 9 p.m. to 8 a.m. will override the parent's setting. Users over
6 the age of 18 may opt-in to muted push notifications.

11. **User Options:**

- 7 a. Deletion/Deactivation of User Account: Users have had the ability to delete or
8 deactivate their account since the TikTok Platform's launch in the U.S.
- 9 b. Screen Time Limits: TikTok introduced daily screen time limits in
10 approximately February 2019 by launching a feature that allowed users to set
11 personalized, in-app screen time limits that are locked behind a four-digit
12 passcode. In approximately 2019, parents were also able to set a cap on their
13 teen's screen time. In approximately March 2023, TikTok introduced a 60-
14 minute default daily screen time limit for users under 18 years old. Once the 60-
15 minute limit has been reached, teens are prompted to enter a passcode to
16 continue watching, requiring them to make an active decision to extend the time
17 spent on the TikTok platform. For users in TikTok's Under 13 Experience, the
18 daily screen time limit is enabled by default to 60 minutes. Once the 60-minute
19 limit has been reached, a parent or guardian must enter a passcode to enable 30
20 minutes of additional watch time. New screen time limit features were also
21 added to Family Pairing in approximately March 2023, including (1) letting
22 parents set custom daily screen time limits for their teen, (2) giving parents

1 access to their teen’s screen time dashboard, and (3) allowing parents to set times
2 when notifications are muted (in addition to the default notification mute
3 settings). In approximately June 2023, TikTok released usage reminders for
4 users spending more than 100 minutes on TikTok, which prompted these users
5 to utilize the available screen time management tools.

6 c. Screen Time Breaks: Screen Time Breaks were first made available on the
7 TikTok platform in approximately June 2022. This feature allows users to set
8 custom reminders to take breaks from the Platform.

9 d. Muting of Notifications: Default mute windows for minor users were introduced
10 on the TikTok Platform in approximately August 2021. For users under 15 years
11 old, push notifications are always muted from 9 p.m. to 8 a.m. by default, and
12 this setting cannot be changed. For users aged 16 to 17 years old, push
13 notifications are always muted from 10 p.m. to 8 a.m. by default, and this setting
14 cannot be changed. In approximately March 2023, the TikTok Platform
15 introduced a feature that enables parents to set a schedule to mute notifications
16 for their teen using Family Pairing. The default scheduled time overrides any
17 custom time set by the parent. For example, if a parent sets their 13-year-old’s
18 scheduled time from 11 p.m. to 7 a.m., the default time from 9 p.m. to 8 a.m.
19 will override the parent’s setting.

20 e. Comment Management: As of at least April 2019, users have been able to
21 manage comments on their videos using the “Filter Comments” tool. This tool
22 allows users to make a custom list of keywords that are automatically blocked
from any comments on the user’s videos. Additionally, since at least April 2019,

1 users have been able to restrict comments to friends or turn comments off
2 completely. In approximately March 2021, a “Filter All Comments” feature,
3 which allows users to hide all comments on their videos until the user approves
4 them, was introduced on the TikTok Platform. Additionally, in approximately
5 March 2021, a new comment prompt that asks people to reconsider posting a
6 comment that may be inappropriate or unkind, and directs them to the
7 Community Guidelines, was introduced on the TikTok Platform. In
8 approximately May 2021, the TikTok Platform launched a method for creators
9 to delete multiple comments at once or report them for potentially violating
10 Community Guidelines. In approximately July 2023, the TikTok Platform
11 introduced Comment Care Mode, which filters out comments similar to those
12 that the creator has previously reported or deleted or are inappropriate, offensive
13 or contain profanity.

14 The TikTok Defendants refer Plaintiffs to their Objections and Responses to Plaintiffs’
15 Second Set of Interrogatories for the person(s) who have responsibility and/or knowledge of the
16 above-referenced “Named Features.”

17 Dated: February 24, 2025

KING & SPALDING LLP

/s/ Geoffrey M. Drake

Geoffrey M. Drake, *pro hac vice*

TaCara D. Harris, *pro hac vice*

King & Spalding LLP

1180 Peachtree Street, NE, Suite 1600

Atlanta, GA 30309-3521

Telephone: (404) 572-4600

Facsimile: (404) 572-5100

Email: gdrake@kslaw.com

tharris@kslaw.com

1 Kristen R. Fournier, *pro hac vice*
2 King & Spalding LLP
1185 Avenue of the Americas, 34th Floor
3 New York, NY 10036-2601
Telephone: (212) 556-2100
4 Facsimile: (212) 556-2222
Email: kfournier@kslaw.com

5 David P. Mattern, *pro hac vice*
King & Spalding LLP
1700 Pennsylvania Avenue, NW, Suite 900
6 Washington, DC 20006-4707
Telephone: (202) 737-0500
7 Facsimile: (202) 626-3737
Email: dmattern@kslaw.com

8 Bailey J. Langner (SBN 307753)
King & Spalding LLP
50 California Street, Suite 3300
9 San Francisco, CA 94111
Telephone: (415) 318-1200
10 Facsimile: (415) 318-1300
Email: blangner@kslaw.com

11 *Attorneys for Defendants TikTok Inc., ByteDance*
12 *Inc., TikTok Ltd., ByteDance Ltd., and TikTok*
13 *LLC*

VERIFICATION

I, [REDACTED], am an [REDACTED] at TikTok Inc., and I am authorized to make this verification for, and on behalf of, TikTok Inc., ByteDance, Inc., TikTok Ltd., ByteDance Ltd., and TikTok LLC (collectively the "TikTok Defendants"), who are the parties to this action. I have reviewed the foregoing document entitled THE TIKTOK DEFENDANTS' OBJECTIONS AND SUPPLEMENTAL RESPONSES TO PLAINTIFFS' FOURTH SET OF INTERROGATORIES and know its contents. I have reviewed the information available to the TikTok Defendants and their employees. Based on such review, I am informed and believe that the matters stated in the foregoing document are true and correct as of the date of service.

I declare under the penalty of perjury under the laws of the State of New York that the foregoing is true and correct.

Executed this 24th day of February, 2025 at New York, New York.

[REDACTED]