

AMENDED Exhibit 633

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

Ryn Linthicum

1

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA

3 IN RE: SOCIAL MEDIA ADOLESCENT) MDL No.
4 ADDICTION/PERSONAL INJURY) 4:22-md-3047-YGR
5 PRODUCTS LIABILITY LITIGATION)
6)

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF LOS ANGELES
9 SPRING STREET COURTHOUSE

10 COORDINATION PROCEEDING)
11 SPECIAL TITLE [RULE 3.400]) Lead Case No.
12) 22STCV21355
13 SOCIAL MEDIA CASES)
14)

15 This Document Relates to:)
16)

17 ALL ACTIONS)
18)
19)
20)
21)
22)
23)
24)
25)

Thursday, April 17, 2025

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Video-Recorded Oral Deposition of
KATHRYN "RYN" LINTHICUM, held at the offices
of King & Spalding LLP, 50 California Street,
Suite 3300, San Francisco, California,
commencing at 9:01 a.m. PST on the above
date, before Michael E. Miller, Fellow of the
Academy of Professional Reporters, Certified
Court Reporter, Registered Diplomate
Reporter, Certified Realtime Reporter and
California CSR #13649.

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Ryn Linthicum

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KATHRYN "RYN" LINTHICUM,
having been duly sworn,
testified as follows:

EXAMINATION

BY MR. VANZANDT:

Q. Good morning, Ms. Linthicum.
My name is Joseph VanZandt, and I'm going to
be taking your deposition today.

A. Good morning.

Q. Can you please state your full
name for the record, please.

A. Kathryn Platt Linthicum.

Q. Okay. And is it okay if I
refer to you as Ms. Linthicum today?

A. That's okay.

MR. MATTERN: Mr. VanZandt,
sorry to interrupt, but I don't think
the witness can see you. Is there a
way to add a screen so that we can see
you?

THE VIDEOGRAPHER: Give me one
second. The time is now 9:02. Going

1 to move residences from where you live right
2 now?

3 A. I do not currently plan on it.
4 My lease is technically up in end of May, so
5 we're hoping to renew, but who knows?

6 Q. Okay. Well, good luck with
7 that.

8 A. Thank you.

9 Q. As we sit here today, you are a
10 former employee of TikTok and ByteDance,
11 correct?

12 A. Correct.

13 Q. And you worked at TikTok and
14 ByteDance for just over three years, between
15 April of 2021 and May 2024; is that right?

16 A. That is right.

17 Q. And during your time at TikTok
18 and ByteDance, you were part of the trust and
19 safety division; is that right?

20 A. Yes. I don't know whether it's
21 a division or a team or an org or what you
22 call it, but I was a part of trust and
23 safety.

24 Q. And we'll drill down a little
25 more specifically on that in just a little

1 bit.

2 Do you have any ongoing
3 professional relationship with TikTok or
4 ByteDance?

5 A. I still work in trust and
6 safety, and it's a pretty small-knit
7 community, so I see them at different, like,
8 trust and safety events or through different
9 professional groups that each of our
10 companies have membership in. I sometimes
11 see folks or hear about updates from them
12 through those.

13 Q. Okay. Do you -- have you done
14 any work for TikTok since you left the
15 company in May 2024, like consulting or any
16 other type of work for TikTok?

17 A. No.

18 Q. And have you received any
19 compensation for your time preparing for your
20 testimony or sitting for your testimony
21 today?

22 A. I have not been paid for this.

23 Q. I'm not suggesting you should
24 be, by the way, but I was just asking.

25 A. No, I -- that's fine.

1 Q. I want to pull up a few
2 documents just to learn a little bit more
3 about your background. So if we can start
4 with Tab 1, please, I'm going to mark this as
5 Exhibit 1.

6 (Whereupon, TikTok-Linthicum-1,
7 Curriculum Vitae, was marked for
8 identification.)

9 BY MR. VANZANDT:

10 Q. Ms. Linthicum, we should have
11 someone in the room that can hand you a
12 physical copy of the documents that we go
13 through, and I think it may also be displayed
14 on the screen that you're able to see.

15 A. Yes.

16 Q. Okay. I'll give you a moment
17 to get the document in your hand.

18 Do you have that in front of
19 you?

20 A. I do.

21 Q. I'll represent to you that
22 TikTok's lawyers produced this document to
23 us.

24 Do you recognize this document
25 as a résumé that you prepared?

1 A. Yes.

2 Q. And when was this particular
3 résumé last updated?

4 A. May 2024.

5 Q. So it does not list your
6 current employment, right?

7 A. Correct.

8 Q. And we'll talk about that in
9 just a little bit. Do you see at the top of
10 your résumé, on the top right, you provided a
11 link to your LinkedIn profile?

12 A. I do.

13 Q. And so we went to your LinkedIn
14 profile and downloaded your résumé from there
15 as well. So I'm going to pull that up as
16 Tab 2. I'm going to mark that as Exhibit 2.

17 (Whereupon, TikTok-Linthicum-2,
18 LinkedIn Profile, was marked for
19 identification.)

20 BY MR. VANZANDT:

21 Q. And do you recognize this as
22 your résumé that is available on LinkedIn?

23 A. It looks roughly like what I
24 recall from the last time I touched it.

25 Q. Yeah. Fair enough.

1 And I'll represent to you that
2 I know this doesn't look like the LinkedIn
3 page, but when you right click or print to
4 PDF, this is the format that it comes
5 directly from LinkedIn, okay?

6 A. Okay.

7 Q. So I want to start here on the
8 bottom half of your résumé where it says
9 Experience.

10 Do you see that?

11 A. Oh, the LinkedIn page? Yes.

12 Q. That's right, the LinkedIn
13 page. My apologies. It's just more -- I
14 guess, more current than the other résumé, so
15 I wanted to look at your current employment.

16 You currently work for a
17 company called Anthropic; is that right?

18 A. Anthropic PBC.

19 Q. Okay. And what is Anthropic?
20 What type of company is that?

21 A. Anthropic is a company that
22 develops foundational AI models to
23 provide primarily to other customers to use,
24 but they also host Claude online.

25 Q. And that company is paid out of

1 San Francisco; is that right?

2 A. Yes.

3 Q. And it says that your core
4 focus at that company is child safety and
5 emotional and psychological harm.

6 Do you see that?

7 A. Yes, I do see that. That's the
8 title of the job posting that HR gave it.

9 Q. Understood.

10 And is that a fair title for
11 the current job that you're doing there?

12 A. I am a policy design manager
13 there. That's a little bit more unwieldy of
14 a title. I typically refer to it as user
15 well-being as the policy area that I work in,
16 especially because it also covers some
17 additional content areas that don't
18 traditionally fall under those buckets, such
19 as adult sexual activity and human
20 trafficking.

21 Q. I want to look now just below
22 that about your TikTok employment.

23 It says that you were employed
24 with TikTok -- we already discussed the
25 dates, but it looks like three years, two

1 months. Looks like you had two different
2 roles. The first role was between April 2021
3 and July 2022, and that was trust and safety
4 global policy manager; is that right?

5 A. Yes. The end date of that was
6 a little bit fuzzy because the old global
7 issue policy lead whose role I was taking
8 over was on vacation for a long period of
9 time between July and August, and then our
10 performance cycle and promo cycle doesn't
11 happen until September.

12 So functionally, that was when
13 I took on the responsibilities of the lead
14 was around August, and then finished up my
15 general policy manager responsibilities end
16 of July.

17 Q. Okay. And it says here during
18 that first role you had -- your core focus
19 was mental well-being and suicide prevention;
20 is that correct?

21 A. Correct. That wouldn't have
22 been the, like, job title itself. That's
23 more just a general description in the trust
24 and safety world of the areas that I focused
25 on primarily.

1 Q. Okay. And we are going to go
2 back to your longer résumé in just a few
3 moments that has, I think, some more details
4 about the work that you did there, but I want
5 to ask you first about the top employment
6 there under TikTok.

7 It says between August 2022 and
8 May 2024. Understanding those dates at the
9 beginning may be slightly off, it says there
10 you were a trust and safety global issue
11 policy lead; is that correct?

12 A. Yes.

13 Q. And was that a -- was that a
14 promotion or did you just slightly change
15 roles?

16 How would you describe that
17 change that you had in your position?

18 A. It was a little bit of both.
19 We didn't really have an exact org chart at
20 TikTok, so I don't really know how it
21 corresponds with, like, traditional notions
22 of promotion.

23 But I went from being a, like,
24 individual member of the team that was
25 responsible for an area like a subissue of

1 policies to the team lead or team manager.

2 And so for the global end, I was responsible
3 for doing things like setting roadmaps and
4 overseeing some other policy managers' work
5 output to make sure that we were doing our
6 jobs in the right direction.

7 Q. If we scroll down just a little
8 bit on your résumé, it has ByteDance listed
9 there. And then it looks like the identical
10 roles under ByteDance.

11 Do you see that?

12 A. Yes.

13 Q. Those were not separate jobs;
14 you were working -- it was all in one. You
15 were working for both ByteDance and TikTok
16 during that same time frame; is that fair?

17 A. Yes. So the -- like, my
18 employment contract and the paychecks that I
19 was receiving were through ByteDance, but I
20 worked as well on the TikTok product, and so
21 for like name recognition and search
22 optimization, a lot of folks would list
23 TikTok and ByteDance on LinkedIn or on
24 résumés just because a lot of folks in the US
25 don't really know what ByteDance is, but

1 there's more recognition of TikTok.

2 Q. Understood.

3 We're going to talk more about
4 more specifics about your work at TikTok, but
5 before that, I want to back up a little bit
6 and talk about your background before you
7 joined the company, okay?

8 A. Okay.

9 Q. So we can pull that down, and
10 let's go back to Exhibit 1.

11 Ms. Linthicum, this looks like
12 it's a one-pager. You squeezed as much as
13 you could in on one page on this résumé; is
14 that fair?

15 A. It's a résumé. I really didn't
16 want a second page.

17 Q. Yeah. I understand how that
18 is.

19 Let's start at the bottom where
20 it talks about your education, okay?

21 A. Okay.

22 Q. You see down there -- and we
23 have a trial tech who will be kind of pulling
24 stuff up and highlighting as we go, and so
25 sometimes it's easy to follow down on the

1 screen.

2 But do you see on the bottom it
3 indicates your education, that you received
4 your undergraduate degree from Reed College
5 with a Bachelor of Arts in psychology back in
6 May of 2014, right?

7 A. Correct.

8 Q. And then you received a
9 master's degree in clinical psychology from
10 Florida State University in 2020?

11 A. Yes, the date of that degree
12 conferral was in May 2020.

13 Q. And you earned your master's
14 from Florida State while you were enrolled in
15 a doctoral program there, correct?

16 A. Yes. I was -- I earned it
17 along the way in the doctoral program, and
18 then eventually decided to leave the doctoral
19 program after I had completed my binder stage
20 but before the final dissertation and defense
21 of internship.

22 Q. And that doctoral program at
23 Florida State was in clinical psychology; is
24 that correct?

25 A. Yes.

1 Q. And you were in that program
2 from August 2017 to May 2021; is that right?

3 A. Yes, approximately. I -- when
4 I received the job offer from ByteDance, I
5 took a yearlong leave of absence originally.
6 That was an option that you could do through
7 Florida State, and then I extended it by a
8 second year.

9 And so functionally, I'm not
10 sure, like, when the exact dates would line
11 up in their system, but, yes, that was when I
12 was more active.

13 Q. Let's talk about your
14 experience before TikTok. I'm just going to
15 start from the bottom here, where it says
16 Reed Research Reactor.

17 Do you see that?

18 A. I do see that.

19 Q. And is it fair to say that is
20 a -- would that have been a part-time job,
21 part-time work you did while you were in
22 undergraduate school at Reed College?

23 A. Yes, it was my part-time job on
24 campus to help pay for my education.

25 Q. I understand.

1 This doesn't matter too much
2 for this case, but a -- it sounds very
3 interesting, working with a -- was that a
4 nuclear reactor, is that what you were doing?

5 A. Yes, I was a reactor operator,
6 senior reactor operator and supervisor at the
7 nuclear reactor on campus.

8 Q. Let's go up to your next listed
9 job, Iamalive.org, and it looks like you
10 worked with that organization from 2012 to
11 2017, right?

12 A. Yes, on and off. That wasn't,
13 like, consistent employment. It was a
14 volunteer position that varied in the amount
15 that I volunteered with them.

16 Q. So it says you first worked
17 there as an online suicide and crisis
18 prevention specialist, right?

19 A. I believe the title was online
20 suicide and crisis intervention specialist.

21 Q. Apologies if I misstated that.
22 And then you were a volunteer
23 supervisor in between 2015 and 2017?

24 A. Correct.

25 Q. And part of your work for that

1 organization was related to helping or
2 assisting individuals with issues related to
3 suicide; is that right?

4 A. Yes. The organization was an
5 online chat-based crisis intervention
6 service, so similar to how folks can call up,
7 like, 988 in the States and reach suicide
8 prevention specialists and crisis prevention
9 volunteers, I was doing that within an online
10 chat-to-chat setting.

11 Q. So you would be one of the
12 individuals chatting with others who had
13 reached out for help; is that fair?

14 A. Yes. During my -- more so
15 during the time that I was -- the first three
16 years there for the online suicide and crisis
17 intervention specialist role.

18 When I became a supervisor,
19 then typically I would be supervising the
20 individual volunteers who were engaging in
21 the chats and helping to provide guidance and
22 support for that while also sometimes picking
23 up, you know, chats myself, depending on
24 queue volumes and needs.

25 Q. Let's go up to your next listed

1 employment, University of North Carolina,
2 Chapel Hill, project coordinator.

3 Do you see that?

4 A. I do.

5 Q. And were you enrolled at the
6 University of North Carolina at this time?

7 A. I did not start as being
8 enrolled there. So for my last year of
9 employment there, UNC had the ability for
10 employees to enroll as a nondegree-seeking
11 student, and they subsidized, you know, one
12 or two courses a term for people who wanted
13 to do that.

14 So I enrolled and took two
15 semesters of graduate-level statistics
16 courses as a non-degree-seeking student.

17 Q. It says here under the title
18 that you facilitated data collection for
19 1.75 million NIH-R01 research grant
20 investigating peer influences on behavior; is
21 that right?

22 A. That was one of the studies
23 that I worked on. For my first year there, I
24 was split across two labs in clinical psych
25 and developmental psych, and worked on a few

1 different grant lines, but that was the
2 primary one that I was doing most of the work
3 and data collection for.

4 Q. Going down to the third bullet
5 point it says: Interfaced with youth, ages 9
6 through 14, and families for recruitment and
7 data collection purposes.

8 Is that -- was that interfacing
9 with youth part of the research grant we just
10 discussed, investigating peer influences on
11 behavior?

12 A. It was part of that grant and
13 also part of a different grant as well that
14 was under the same lab.

15 Q. As part of that work, did you
16 have to get parental consent for minors
17 between the age of nine and 14 to participate
18 in the study?

19 MR. MATTERN: Objection to
20 form.

21 A. Yes, we did collect parental
22 consent and child assent to participate for
23 at least one of the studies.

24 For the second one, I'm not a
25 hundred percent sure what the consenting

1 process was like because it was a large
2 school-based cohort setting, and it was a
3 longitudinal one that had been set up ahead
4 of my time, and so I don't remember the exact
5 details of the consenting process for that
6 study.

7 Q. So at least for the first part
8 that you referenced where you were part of
9 interfacing with youth and families, a minor
10 would not have been able to participate in a
11 study if their parents did not consent,
12 correct?

13 A. Correct. And if the minor
14 themselves did not assent, they also would
15 not have been able to participate regardless
16 of the parent consent.

17 Q. So the last bullet point listed
18 here says: Researched adolescent digital
19 communication on social media about suicide,
20 self-injury, and body image.

21 Is that right?

22 A. Yes.

23 Q. And then it appears that maybe
24 you left UNC to start your doctoral program
25 at FSU; is that correct?

1 A. I did.

2 And just to clarify as well,
3 the researched adolescent digital
4 communication, that was a separate line of
5 research and separate set of studies from the
6 one that the previous bullet was talking
7 about and from the grant overall. That was
8 like a few different projects, so they had
9 different processes.

10 Q. Okay. Thank you.

11 Let's go now to your next
12 employment, the American Association of
13 Suicidology.

14 Do you see that?

15 A. I do see that.

16 Q. And so there -- well, let me
17 just say this.

18 It looks like you continued
19 work related to suicide prevention, research,
20 and support; is that accurate?

21 A. Yes. My passion is in suicide
22 prevention and research and trying to
23 understand this phenomenon better and be able
24 to prevent it in the world.

25 Q. Now, go up to the next one --

1 the next employment listed there is with
2 Florida State University. And would that
3 have been work you were doing during your
4 doctoral program at Florida State?

5 A. Yes.

6 Q. Under the main title there it
7 says: Designed, executed and communicated
8 quantitative research, including
9 investigations into machine learning and risk
10 prediction, and suicide intervention ethics.

11 Is that correct?

12 A. That is correct.

13 Q. And again, this looks like
14 continued work in the area that you said
15 you're passionate about, which is suicide,
16 right?

17 A. Suicide prevention, yes.

18 Q. Thank you for that
19 clarification, suicide prevention.

20 And it also notes here that --
21 on the last bullet point, that you provided
22 clinical therapy -- I'm sorry, clinical
23 services, therapy and assessment, to youth,
24 families and adults.

25 Do you see that?

1 A. I do see that. As a part of a
2 clinical psychology doctoral program, you
3 would typically spend a few years giving --
4 providing therapy and assessment services
5 under supervision of licensed clinicians to
6 be able to start to build skills and learn in
7 that area.

8 Q. And was that specific or
9 related to suicide prevention or was that
10 more general issues?

11 A. It was both. I -- part of
12 being a well-rounded clinician in training is
13 that you learn about a lot of different
14 areas, so it included everything from
15 neuropsych assessment, which is not related
16 at all to -- I took a few terms of advanced
17 practicum, which was focused more on
18 high-risk suicide cases.

19 Q. We can pull this down, please.

20 By my count, it appears that
21 you have authored or coauthored about a dozen
22 academic literature -- literature articles.

23 Does that sound accurate?

24 A. That sounds about correct of
25 published peer-reviewed papers.

1 Q. Okay. I'm going to pull up
2 Tab 3, please, and I'll mark that as
3 Exhibit 3.

4 (Whereupon, TikTok-Linthicum-3,
5 Google Scholar page, was marked for
6 identification.)

7 BY MR. VANZANDT:

8 Q. And I'll represent to you that
9 I pulled your Google Scholar page from
10 Google.

11 Have you ever seen this before?

12 A. I have.

13 Q. Okay. And I will -- it looks
14 like, I think, counting and then going over
15 to the next page, that it is right at 12
16 peer-reviewed articles that you've published;
17 is that right?

18 A. I think that the -- I don't
19 think so because the last one on this page --
20 or the "When and to what extent do peers
21 influence youth behavior," I don't believe
22 that that was a peer-reviewed article. I
23 think that was a paper that was presented at
24 a symposium by the first author.

25 I believe the rest of them are

1 publications of peer-reviewed articles.

2 Q. And would it be fair to say
3 that your research and publications have been
4 related to topics of psychology, well-being,
5 and suicide?

6 A. Generally speaking, I think,
7 yes.

8 Q. And according to Google Scholar
9 here on the top right, your articles that
10 you've authored or have been a coauthor of
11 have been cited over 700 times in other
12 academic articles.

13 Any reason to dispute that?

14 A. I do not know how they
15 calculate but don't have any reason to
16 dispute.

17 Q. Okay. Thank you.

18 I want to shift back and talk a
19 little bit more about your work and your role
20 at TikTok within the trust and safety team.
21 And I want to actually go back to Exhibit 1.
22 Sorry for jumping around a little bit, but
23 we're going to go back to Exhibit 1, and I'm
24 just going to focus on the top part up there
25 under ByteDance and TikTok global.

1 Do you see that?

2 A. I do see that.

3 Q. So the first -- I want to -- I
4 know we talked about these roles a little bit
5 through, like, your LinkedIn profile, but I
6 wanted to dig in a little deeper.

7 So your first role here is
8 issue policy manager, well-being and suicide
9 prevention, and that was from April of 2021
10 to July 2022, right?

11 A. Yes.

12 Q. With the caveats you mentioned
13 earlier about the -- how the dates at the end
14 could be off.

15 A. Correct.

16 Q. So I'm seeing, like, a slightly
17 different title here, slightly different on
18 LinkedIn. Understanding there may be some
19 variations on what those titles were
20 specifically called, but these were the only
21 two roles you did hold at the company, right?

22 A. Correct. I think the title
23 language sometimes shifted around and was
24 ambiguous or changed to, like, communicate
25 what the role was for. Like, in the sake of

1 a résumé it's to apply to different
2 companies, so you want to make sure that they
3 know what you were actually covering.

4 Q. Thank you. I want to make sure
5 I was not missing anything there.

6 It says under the title there
7 describing your initial role with TikTok, it
8 says: Developed and maintained content
9 policies related to suicide, self-harm,
10 eating disorders and dangerous acts.

11 Is that correct?

12 A. Yes, it does say that.

13 And just to clarify, I was on
14 the global team still there, so the content
15 policies that I was working on and developing
16 were primarily aimed at non-US countries
17 because I didn't work directly on US policy.

18 Q. Was there a specific team that
19 worked on US policy?

20 A. There were specific individuals
21 and then a specific team that was brought on
22 board to work on US policy. I think that
23 when I began in April 2021, that was still in
24 a little bit of a transition state, but the
25 first person that I know that was working

1 specifically on these issues for US and
2 Canada was bundled in as well to that was
3 Alexander Corbet.

4 Q. And when you say global
5 policies, are you referring to outside the
6 United States, everywhere else around the
7 world, except China?

8 A. Yes. We did not work on
9 anything to do with China or Douyin because
10 they don't have TikTok there, so, yeah, it
11 would have been the other operating regions
12 outside of US, Canada and China.

13 Q. So ByteDance -- and I think you
14 just mentioned it, but ByteDance owns and
15 operates another platform called Douyin in
16 China; is that right?

17 MR. MATTERN: Objection to
18 form.

19 A. Yes, TikTok, to my knowledge,
20 doesn't exist in China and it's just -- it's
21 a different platform.

22 BY MR. VANZANDT:

23 Q. And did you ever do any work
24 related to Douyin?

25 A. No.

1 Q. So going back to your
2 description of what you worked on here, were
3 you aware in your role at TikTok of risks to
4 TikTok users related to suicide?

5 MR. MATTERN: Objection to
6 form.

7 A. I don't think I would put it
8 that way. I think that the company was --
9 like, wanted to make sure that they were
10 putting together a suite of policies that was
11 responsible, you know, for the industry that
12 covered a wide range of topics, and one of
13 the standard ones for trust and safety
14 includes topics of mental health.

15 And so it's not, you know,
16 directly in terms of risk to user, but more
17 so these are, you know, sensitive topics as a
18 whole, that there are different, you know,
19 communication standards around throughout the
20 world, and so we -- like, companies develop
21 policies that are around this topic area.

22 BY MR. VANZANDT:

23 Q. In your time at TikTok, did you
24 ever become aware of risks related to
25 self-harm for TikTok users?

1 MR. MATTERN: Objection to
2 form.

3 A. I became aware of allegations
4 of risk. I think that posing it as causal
5 risk doesn't really align with actually what
6 the scientific consensus is of how suicide
7 and self-harm risk operates and develops
8 either across a life span or within an
9 individual.

10 MR. VANZANDT: Okay. Move to
11 strike everything after "became aware
12 of allegations of risk."

13 MR. MATTERN: Objection.

14 BY MR. VANZANDT:

15 Q. Okay. I'm going to go back --
16 go down to the first bullet point listed
17 there. It says: Wrote evidence-based
18 policies to address user safety concerns.

19 Do you see that?

20 A. I do see it.

21 Q. What are the user safety
22 concerns you're referring to there?

23 A. So these were concerns
24 primarily centered around content that showed
25 users that were engaging in active acts of

1 self-harm or active, you know, acts of
2 suicide or, like, had expressed suicide
3 ideation or experience -- like, lived
4 experience with eating disorders, either past
5 or present, on the platform.

6 So primarily around the content
7 that users who may have been struggling with
8 these were presenting on the platform,
9 wanting to make sure that we were responding
10 to those in a manner that was appropriate for
11 helping to foster the individual safety and
12 protect also the way that they, you know,
13 operate so that that way they weren't overly
14 stigmatized while also making sure that in
15 areas of, for instance, ongoing active risk,
16 they would be properly escalated to law
17 enforcement or to officials to be able to get
18 help.

19 Q. During your time at TikTok, did
20 you become aware of any user safety concerns
21 that were not related to content?

22 MR. MATTERN: Objection to
23 form.

24 A. I don't think so. I'm, like,
25 struggling to answer that a bit because user

1 safety is a pretty broad term, and a part of
2 trust and safety is that you evaluate, like,
3 risks in general, but that's not one-to-one
4 with safety concerns or safety outcomes.

5 BY MR. VANZANDT:

6 Q. The next bullet point says:
7 Leveraged knowledge of machine learning and
8 risk frameworks to improve algorithm-driven
9 feed safety, without sacrificing average
10 video viewership or average session time
11 metrics.

12 Do you see that?

13 A. I do see that.

14 Q. What do you mean here by the
15 phrase "algorithm-driven feed"?

16 A. So I had worked on a project
17 that looked at content dispersion in the
18 For You feed, so thinking through are there
19 ways of structuring the For You feed that
20 would help to either promote well-being or
21 not -- like, provide for diversity to the
22 feed, and so that's what I'm referring to
23 there.

24 At the time -- I want to
25 clarify too that, like, average video

1 viewership or average session time metrics
2 were not actually anything that we were
3 concerned with as a part of that project, at
4 least on my team's end.

5 It's represented on my résumé
6 because frequently when you're applying to
7 jobs externally, someone who is from more of
8 the business side of the team will be doing
9 the initial review, and so it's more standard
10 to include that language for résumés when you
11 know that you're going to be screened by,
12 like, an HR VP or someone on the product side
13 versus someone working directly within trust
14 and safety. So I just want to be clear on
15 that.

16 MR. VANZANDT: Move to strike
17 as nonresponsive to any question
18 starting with "at the time I want to
19 clarify."

20 MR. MATTERN: Objection.

21 BY MR. VANZANDT:

22 Q. So you did write that in your
23 résumé, though, right? You wrote that you
24 did that work at TikTok without impacting
25 business metrics like average session time or

1 average video viewership, right?

2 MR. MATTERN: Objection to form
3 and characterizes document.

4 A. I did write that down. It's
5 not something that was a part of the project
6 or the approach at the time in terms of,
7 like, considerations for the actual project
8 launch and, like, with these, like, metrics
9 tracking at least from my end on the trust
10 and safety side.

11 BY MR. VANZANDT:

12 Q. Is it your testimony that --
13 strike that.

14 Is it your testimony that this
15 metric tracking that you referred to was not
16 part of the work that trust and safety did at
17 TikTok?

18 MR. MATTERN: Objection to form
19 and characterizes testimony.

20 A. I don't know that I could speak
21 for the entire trust and safety organization
22 as a whole. For the role of -- that I was
23 performing as a product policy manager, our
24 goal was to write and make recommendations
25 for evidence-based policies without respect

1 to how it would necessarily impact core
2 business metrics like user time, engagement
3 length, things like that.

4 We were really focused on
5 recommendations and asked to give
6 recommendations that reflected safety and
7 risk mitigation versus business -- like,
8 without consideration of business
9 considerations.

10 BY MR. VANZANDT:

11 Q. So is it your testimony that
12 during the time you worked at TikTok and
13 ByteDance that on any of the projects you
14 worked on, that you did not have to consider
15 any of those business considerations?

16 MR. MATTERN: Objection to
17 form, and asked and answered.

18 A. They were not a part of my
19 direct, like, things that I had to include in
20 my proposals, policies, advocating for the
21 direction that I felt like the company should
22 go.

23 I don't know whether they were
24 a part of, you know, other considerations as
25 a part of the projects as a whole that I

1 worked on.

2 Q. You certainly saw within the
3 company, though, individuals who were
4 concerned about metrics like average session
5 time and average video viewership, right?

6 MR. MATTERN: Objection to
7 form, foundation.

8 A. I saw documents that indicated
9 that some of these metrics were core business
10 considerations on the product side, which is
11 pretty typical for tech and business units.

12 I also knew from talking with
13 some folks on more of the product side that
14 they were interested in items like screen
15 time because they wanted to be able to build
16 interventions for monitoring and facilitating
17 mindful engagement and screen time as well as
18 some of the, like, take a break or screen
19 time management tools that trust and safety
20 product, I think, worked to launch.

21 BY MR. VANZANDT:

22 Q. I want to go back up to where
23 you're describing the work that you did as
24 part of your role, and when you say that --
25 let me just read that bullet again.

1 It says: Leveraged knowledge
2 of machine learning and risk frameworks to
3 improve algorithm-driven feed safety, without
4 sacrificing average video viewership or
5 average session time metrics.

6 Is that last statement after
7 the comma -- is that truthful and accurate?

8 MR. MATTERN: Objection to
9 form, and asked and answered.

10 A. To the best of my knowledge,
11 when we were doing, like, a retrospective
12 after launch, that was accurate. And that's
13 why it wound up in my résumé a few years
14 later.

15 BY MR. VANZANDT:

16 Q. The next bullet point says:
17 Aligned with emergency and incident
18 management teams to resolve global
19 high-profile content escalations.

20 Do you see that?

21 A. I do see that.

22 Q. What do you mean by
23 high-profile -- high-profile content
24 escalations?

25 A. So the way that moderation

1 works, just because of the overwhelming
2 volume of content that's uploaded, you know,
3 every minute of every day is that there are
4 tiers of moderation that occur.

5 So, you know, I, as a global
6 policy manager, would not review every single
7 video that was uploaded or flagged, and we
8 also had teams that were in charge of
9 specific regional markets, for instance, or
10 specific moderation groups.

11 And so by high-profile, what I
12 mean is that the topic was ambiguous enough
13 or the attention on it was global enough in
14 nature that the decisions to be made about
15 the content and the response and whether it
16 fit within our policies or not had to be
17 escalated to a subject matter expert past all
18 of those initial layers.

19 Q. Were there particular topics or
20 categories that were considered high profile?
21 For example, suicide, would that be one?

22 A. It wouldn't inherently be
23 considered high profile if it was a --
24 something that was clearly defined and
25 answered within our policy content areas

1 itself or, like, didn't necessarily cross all
2 the borders or didn't have a representation
3 of, like, inherent risk within it.

4 But suicide was considered to
5 be one of the more, like, sensitive or
6 imminent risk topic areas in general because
7 frameworks included things like -- like,
8 suicide attempts that were done that were
9 filmed and posted, which we wanted to make
10 sure were handled appropriately and with
11 deference to best practices.

12 So it was, like -- I wouldn't
13 characterize it as high profile, but more so
14 just that we had different -- different
15 layers and different types of safety
16 responses and different focus, depending on
17 some of the potential topic areas or harmful
18 outcomes.

19 So, like, it makes sense that
20 you would have a different workflow for
21 something to deal with suicide or well-being
22 than you would for, like, spam coupons posted
23 to platform.

24 Q. The next one there says: Wrote
25 consumer-facing content and guides on

1 well-being, lived experience disclosure, and
2 mental health.

3 How would those consumer-facing
4 writings be presented to consumers?

5 A. We posted them in the Safety
6 Center, so we had some how-to guides about
7 safe disclosure of lived experience with
8 mental health as well as how to support a
9 friend or someone that you see online who is
10 posting about their mental well-being when
11 you have concerns about it.

12 And those were developed in
13 partnership with, you know, experts at the
14 American Association of Suicide Prevention
15 and some of the other organizations that we
16 worked with. But I believe they were hosted
17 in the Safety Center.

18 And then during campaigns that
19 we ran, we would also sometimes reference
20 them or post links to them within, like,
21 in-app activation campaigns. So, for
22 instance, during Mental Health Awareness
23 Month, we might have a link to the pages in
24 the Safety Center as a part of the awareness
25 or the banner that we had accessible to users

1 more generally.

2 Q. Is the Safety Center a place
3 where TikTok would communicate risk to users
4 and parents and the public?

5 A. I wasn't in charge of the
6 Safety Center, so I don't know whether
7 that's, like, something that it was
8 necessarily used for. On my team, we used it
9 to, you know, communicate guides that would
10 help to increase safety overall and
11 psychoeducation about these topic areas
12 because that was something that, you know, we
13 wanted to -- we knew there was less education
14 necessarily, just as a whole, about how safe
15 messaging works around these topics areas.

16 And so we wanted to do some
17 proactive education to help to make sure that
18 people would be more likely to adhere to some
19 of our platform guidelines that were
20 developed for safety and communication around
21 these topics.

22 MR. VANZANDT: Okay. Move to
23 strike everything after "something
24 that it was necessarily used for."

25 MR. MATTERN: Objection.

1 BY MR. VANZANDT:

2 Q. The Safety Center certainly
3 could have been used to communicate risks to
4 parents and the public, right?

5 MR. MATTERN: Objection to
6 form.

7 A. I don't know. It's -- I didn't
8 really work on minor safety there, and some
9 of the decisions about communicating to
10 parents would have been on the minor safety
11 team's end. So I'm not sure what
12 conversations they had around that.

13 BY MR. VANZANDT:

14 Q. So are you aware of any risk
15 that TikTok communicated to users, the public
16 or the parents through the Safety Center?

17 MR. MATTERN: Objection to
18 form, foundation.

19 A. I'm really mostly familiar with
20 the pages that I worked on, and I think that
21 we had potentially some communication about
22 the fact that different ways of speaking
23 about topics, like suicide and eating
24 disorder, could impact other people with
25 lived experience in different ways. And so

1 that's why we encouraged and had guidelines
2 around safe messaging.

3 But I don't remember the
4 content details enough of the page to be able
5 to say one way or another for sure.

6 Q. So going back up to your next
7 role at TikTok, it says your next role was
8 global issue policy lead, mental health.

9 Was that a more -- is it fair
10 to say that was more of a broader or more
11 general role than your first role?

12 A. It included a different set of
13 responsibilities, including, like, doing
14 things like roadmapping and overseeing
15 different content areas.

16 When I was in my first role, I
17 was primarily focused on suicide and
18 self-harm policies as like my very primary
19 focus, whereas this one was more generally on
20 mental health.

21 There was also a reorg at the
22 time, and so dangerous acts moved out of the
23 team's portfolio, and we had come to realize
24 over time that just having policies around,
25 like, the traditional trust and safety areas

1 that other companies typically had, so
2 suicide, self-harm, eating disorders didn't
3 meet the bar that we wanted for safe content
4 policy.

5 And so we had expanded our
6 focus to include some topics like negative
7 affect, like more general body image issues,
8 and we had been running some campaigns and
9 partnerships around other mental health
10 topics as well.

11 And so the scope basically
12 changed a bit to reflect that broader focus
13 on mental health as a whole versus the very,
14 very specific kind of clinical phenomenon
15 that had been most platforms' focuses to date
16 earlier.

17 Q. Okay. Going down to the second
18 bullet point it says: Coordinate with minor
19 safety and well-being product teams to launch
20 core product teen safety protections.

21 Do you see that?

22 A. I do see that.

23 Q. And is that -- strike that.

24 And that's accurate, right?

25 That's part of the work that you did at

1 TikTok?

2 A. It's accurate. I think that
3 that work was primarily driven by the minor
4 safety and product teams, and so I served as
5 an advisor on some of the mental health
6 considerations there, both in the child
7 safety and the adult, primarily for things
8 that went across the life span.

9 But it's emphasized here
10 because, at the time, my résumé was being
11 used to apply towards child safety and minor
12 safety roles, and so I wanted to emphasize
13 the fact that I was familiar with this
14 population and had coordinated with other
15 teams to do similar work in the past.

16 Q. So the statement is not
17 inaccurate, correct?

18 MR. MATTERN: Objection to
19 form, asked and answered.

20 A. Yes, it's not inaccurate on my
21 résumé. It's just, I think, it was very much
22 a consultant role with the teams that were
23 actually in charge of it versus something
24 that was central to my portfolio of work.

25 ///

1 BY MR. VANZANDT:

2 Q. The next-to-last bullet point
3 says: Serve as spokesperson for media,
4 government and external consultations on
5 mental health and well-being.

6 Do you see that?

7 A. I do see that.

8 Q. You used the phrase
9 "spokesperson." Does that mean that you
10 would have spoken on behalf of TikTok and
11 ByteDance?

12 A. I did for various
13 opportunities.

14 Q. And so you actually did have
15 the opportunity to do that, to speak
16 externally on behalf of the companies?

17 A. I did. There were some events
18 that I was asked to do that for, and I did.

19 Q. Did you undergo media training
20 as part of that role?

21 A. Yes, I did.

22 Q. Okay. I want to -- we can pull
23 that down.

24 I want to establish a little
25 bit of a timeline. I'm not going to draw it

1 Q. I'm going to have some
2 questions for you as well.

3 A. Okay.

4 Q. And I'll just remind you,
5 you're still under oath. And my co-counsel
6 had gone over some of the ground rules with
7 you. Those ground rules are still going to
8 apply to my testimony -- or my questions for
9 you, okay?

10 A. Okay.

11 Q. And I know we've been going
12 long. I'm going to try to go a little
13 faster. If I have sort of yes-or-no
14 questions, I'll just ask you yes or no; is
15 that fair?

16 A. I think that's fair, but I'd
17 like to be able to provide whatever context
18 is necessary to answer the question.

19 Q. Okay. If I need context, I'll
20 ask you, okay?

21 A. Well, I'll respond as best as I
22 can.

23 Q. All right. In your work as
24 part of trust and safety, do you recall
25 working on a feature on the TikTok app called

1 Beauty Retouching?

2 A. I remember providing some
3 analysis and contribution to discussion
4 around the feature. I didn't work on it
5 directly myself because that would have been
6 technically owned by core product and on the
7 trust and safety side by other teams.

8 Q. And what is the Beauty
9 Retouching feature?

10 A. The beauty retouching feature
11 is -- I don't remember whether it was
12 technically categorized as a filter or an
13 effect in app, but the core of it was when
14 you opened up the camera to record yourself
15 in the TikTok app, they had some sliders of
16 things that you could change to adjust your
17 appearance, so things like skin smoothing,
18 teeth whitening and a few other components.

19 Q. Can we pull up Tab 19, please.
20 I'm marking as Exhibit 6
21 TIKTOK3047MDL-054-LARK-00552309.

22 (Whereupon, TikTok-Linthicum-6,
23 Camera "Beauty Retouching" panel
24 effects launch - TnS Mental Health
25 recommendations [May 2023],

TIKTOK3047MDL-054-LARK-00552309 -

TIKTOK3047MDL-054-LARK-00552326, was
marked for identification.)

BY MR. MURA:

Q. Do you recognize this document?

A. I do recognize the document.

Q. And what is this document?

A. This was a document that I
believe I mostly wrote and/or contributed
heavily to that was aligning across different
trust and safety teams our concerns with an
A/B test that was launched about -- by core
product for changes to the Beauty Retouch
panel.

Q. And I'll represent to you this
was produced to us by the lawyers for TikTok
and that it came from your files. Any reason
to dispute that?

A. No reason to dispute.

Q. And this document is titled
Camera Beauty Retouching Panel Effects
Launch.

Do you see that?

A. I do see that.

Q. And TnS Mental Health

1 recommendations?

2 A. I do see that.

3 Q. And May 2023?

4 A. I do see that.

5 Q. And the first sentence says:

6 This document summarizes TnS concerns with
7 the testing and launch of an updated beauty
8 effects retouching panel for users.

9 Do you see that?

10 A. I do see that.

11 Q. And then do you see where it
12 says Background towards the bottom of the
13 page?

14 A. I do see that.

15 Q. And there it says: The Mental
16 Health issue policy team became aware of a
17 product change to TikTok effects on May 23rd,
18 2023 through a viral video criticizing the
19 change on platform.

20 Do you see that?

21 A. I do see that.

22 Q. And then there's a URL. Do you
23 see that URL?

24 A. I do see that URL.

25 Q. And that's the URL that's

1 to the jury, these were all posted on May
2 23rd, 2023, correct?

3 A. That's what the dates listed on
4 the tags are.

5 Q. Okay. And that's the date when
6 trust and safety became aware of this product
7 change through this video, correct?

8 MR. MATTERN: Objection to
9 form, characterizes document.

10 A. To my recollection, we were not
11 a part of the PRD review process from core
12 product on this, and so we became aware when
13 I saw this video on my For You feed.
14 Presumably it would have been May 20 -- 23rd,
15 but I'm not certain, honestly, of the exact
16 date that it was served into my feed.

17 BY MR. MURA:

18 Q. Okay. Well, let's look at --
19 back to Exhibit 6. It was this document.

20 A. Oh. Yes.

21 Q. Do you see in Background where
22 it says: The policy -- the Mental Health
23 issue policy team became aware of a product
24 change to TikTok effects on May 23, 2023
25 through a viral video.

1 Do you see that?

2 A. Yes, so presumably the date was
3 May 23rd, 2023.

4 Q. Okay. Now, the next sentence
5 in that Background section says: These
6 changes are currently fully launched in ROW
7 and undergoing a 90% traffic A/B test, 4
8 groups, in US, Canada, Australia and
9 New Zealand regions.

10 Do you see that?

11 A. I do see that.

12 Q. Okay. And ROW, does that mean
13 rest of world?

14 A. Yes, that was the shorthand we
15 used for rest of world. Of note, that's rest
16 of world, not necessarily including China.
17 It was like rest of world, not -- like, for
18 the markets that we worked on as a global
19 team.

20 Q. And the statement about
21 undergoing 90% traffic A/B test in US,
22 Canada, Australia and New Zealand, that means
23 that TikTok was testing the Beauty Retouching
24 effects product on 90% of the traffic in
25 those four countries; is that correct?

1 A. Again, I wasn't involved with
2 the exact A/B test design or launch of A/B
3 test, so typically how we would interpret it,
4 to my understanding, how it's put forth is
5 that 90% of the traffic from these regions
6 were split into four groups that may have had
7 different conditions for each of those groups
8 for the testing.

9 Q. Okay. But fair to say that
10 there was wide testing of the Beauty
11 Retouching effects product on a substantial
12 percentage of traffic in those four
13 countries?

14 MR. MATTERN: Objection to
15 form.

16 BY MR. MURA:

17 Q. Based on the document?

18 A. I think -- well, so I think
19 that it would -- it would be accurate to
20 characterize that 90% of people were assigned
21 to one testing condition, I think, to my
22 understanding. But -- or, like, to some
23 testing condition there, but that doesn't
24 necessarily mean that every person was
25 actually exposed to the changes because

1 different conditions have different
2 configurations applied presumably in most A/B
3 tests.

4 Q. Okay. And as of May 23rd,
5 2023, according to this document, the beauty
6 effects product feature was available in the
7 United States, correct?

8 MR. MATTERN: Objection to
9 form.

10 A. I believe that some version of
11 it was available in app. I don't know the
12 exact form of it at that time.

13 BY MR. MURA:

14 Q. And that would have been in the
15 United States, correct?

16 A. Yes, I believe so in the United
17 States.

18 Q. Let's go to page 2, which is
19 ending in Bates number 310 at the bottom.

20 Do you see a list under
21 "Retouch settings are presented to users as
22 follows"?

23 A. I do see that list.

24 Q. Okay. And the first item in
25 that list says that, quote: Retouching

1 effects are turned on by default for all
2 users.

3 Do you see that?

4 A. I do see that.

5 Q. And then it says, in
6 parentheses, including minors.

7 Do you see that?

8 A. I do see that.

9 Q. And on by default means the
10 user did not need to take any action,
11 correct?

12 A. For the people in the test
13 conditions for which that was true, then yes.

14 Q. Okay. And that would be true
15 also of minors, correct?

16 A. If a minor was -- was assigned
17 to a condition that included that change,
18 then presumably, yes, because there wasn't,
19 to my recollection, an exclusion criteria in
20 the design for minor users.

21 Q. And below the list there's a
22 paragraph that starts "PR teams."

23 Do you see that?

24 A. I do see it.

25 Q. And it says, quote: PR teams

1 had reviewed the original update proposal,
2 and warned that it was medium to high risk to
3 launch.

4 Do you see that?

5 A. Yes, I do see that.

6 Q. Okay. And it goes on to say:
7 The proposal also passed global legal
8 compliance review.

9 Correct?

10 A. Yes, I do see that.

11 Q. Global legal compliance, those
12 are lawyers, correct?

13 A. I believe so. There was a team
14 that was in charge of it, so I'm not sure if
15 all of them were lawyers or they were all
16 just within that job function.

17 Q. And that's separate from trust
18 and safety, correct?

19 A. Correct.

20 Q. And according to this document,
21 the PR team thought this feature had a,
22 quote, medium to high risk to launch.

23 Do you see that?

24 A. I do see that.

25 Q. And lower down in the

1 paragraph, do you see where it says, quote:
2 keep our users from severe risk of harm.

3 Do you see that language?

4 A. Yes, I do.

5 Q. And here -- you said you
6 worked -- you helped write this?

7 A. I did.

8 Q. Okay. And here you're
9 outlining in this document trust and safety's
10 recommendations from a mental health and
11 well-being perspective; is that right?

12 A. Yes. This was something that
13 we had concerns when we found out about the
14 configuration of this from a mental health
15 and well-being perspective, and so that's why
16 we wrote this doc, was to be very clear about
17 what the concerns were that we had with the
18 A/B testing that we had found out had been
19 launched.

20 Q. And in writing this document,
21 you and your team wanted to keep users from
22 severe risk of harm; is that right?

23 A. I mean, the goal of my team was
24 to keep users, like, in ways that were safe
25 and protective on the platform, so we wanted

1 to mitigate potential for that, yes.

2 Q. Right. The potential to severe
3 risk of harm that this feature would have
4 caused, correct?

5 A. I wouldn't say that this
6 feature would have caused, but that aspects
7 of this feature have been associated with in
8 literature.

9 Q. Okay. So --

10 A. Or not the feature itself, but
11 the broader underlying, like, presumed
12 mechanisms that would impart risk there
13 because it wasn't, like, there isn't a direct
14 research literature on this feature on
15 TikTok.

16 Q. But what you-all wrote was:
17 Had we been consulted earlier in the
18 process -- and you talk about -- you would
19 have welcomed the opportunity -- and then you
20 write: to keep our users from severe risk of
21 harm.

22 Do you see that? I'm just
23 asking if that's what you wrote in the
24 document.

25 MR. MATTERN: Objection to

1 form, characterizes document.

2 A. Those are two parts that are
3 disparate across the sentence in the
4 document.

5 BY MR. MURA:

6 Q. Okay. Let's read the whole
7 sentence: Had we been consulted earlier in
8 the process, we would have welcomed the
9 opportunity to work together across teams to
10 resolve the portions of the proposal that
11 conflict with global expert recommendations
12 and best practices and keep our users from
13 severe risk of harm while maximizing benefits
14 to users and the company.

15 Did I read that correctly?

16 A. You did read that correctly.

17 Q. Okay. And this also says that
18 the proposal passed global legal compliance
19 review, correct?

20 A. Yes, because global legal
21 compliance review doesn't necessarily include
22 all of the subject matter expertise from our
23 team.

24 Q. Okay. And then it goes on to
25 say: To our knowledge, no trust and safety

1 product policy team members were contacted
2 for review or informed of the planned changes
3 at any time.

4 Did I read that correctly?

5 A. You did read that correctly.
6 We weren't always a part of the review
7 process. We were mostly focused on policy
8 work because we were product policy, and so
9 it wasn't standard for every product change
10 to go through our team.

11 Q. Okay. So there were product
12 changes that did not go through trust and
13 safety?

14 A. I wouldn't say that did not go
15 through trust and safety. I don't know about
16 the process as a whole for product launch,
17 just because I wasn't on the product launch
18 team.

19 I do believe that there was
20 trust and safety review that happened, but I
21 think that that was more on the -- if I
22 remember correctly, the, like, legal privacy
23 side or something as well.

24 Q. Okay. But what's written here
25 is: To our knowledge, no trust and safety

1 product policy team members were contacted
2 for review or informed of the planned changes
3 at any time.

4 Correct?

5 A. Yes, product policy was a much
6 smaller team within trust and safety, and to
7 our knowledge, from talking with folks across
8 those teams, no one had been pulled in to
9 consult or review on this, and so this was
10 our document, kind of putting together what
11 our product policy concerns were from some of
12 these teams.

13 Q. Do you see just below that
14 where it says Key Concerns and
15 Recommendations in bold?

16 A. I do.

17 Q. And the paragraph reads: Key
18 Concerns and Recommendations. Several of the
19 changes increase risk to our users,
20 especially minors, and directly contradict
21 external expert recommendations we received
22 regarding beautying effects.

23 Do you see that?

24 A. Beautifying effects, but yes.

25 Q. Beautifying effects, thank you.

1 A. Yes, I see that.

2 Q. Okay. And then it says: They
3 cross several policy "red lines" that the
4 Mental Health issue vertical holds with
5 regards to features that may impact body
6 image and individuals suffering from eating
7 disorders.

8 Do you see that?

9 A. I do see that.

10 Q. And then it says: As currently
11 implemented, the changes have high potential
12 to lead to negative body image and increase
13 body dysmorphia symptoms, especially among
14 teenage girls.

15 Do you see that?

16 A. I do see that.

17 Q. So according to this document,
18 the beautifying effects or Beauty Retouching
19 feature crossed several policy red lines,
20 correct?

21 A. Yes, it crossed red lines
22 within our policy team.

23 Q. And a red line is something you
24 shouldn't do, correct?

25 A. A red line is something that we

1 recommend not doing. I think that there's
2 arguments globally about where red lines
3 should be placed, but for our team, this was
4 something that we felt had strong enough
5 evidence of potential for risk behind it
6 that, like, we -- it shouldn't have been
7 done.

8 Q. Based on your knowledge, what
9 policy red lines is the document referring
10 to?

11 A. I'd have to go back and look at
12 documents, but from my perspective, a policy
13 red line that we held was that people should
14 consent into changes that are being applied
15 to their face, facial structure, and that we
16 shouldn't be implementing recommendations
17 where there was -- or implementing features
18 where there was sufficient research evidence
19 and expert recommendations that there could
20 be risk to users, to the extent that there
21 was for nonconsensual altering of facial
22 shape.

23 Q. So does a -- does turning the
24 beauty effect feature on by default cross a
25 red line?

1 A. It did for me personally as the
2 lead of the team. I can't speak for the
3 company as a whole or for everyone. There
4 was a lot of differences between cultures in
5 terms of how this is thought of and
6 represented, and so it's not something that
7 is a static issue or a universally held red
8 line even within expert circles.

9 But for me, as the policy lead,
10 it crossed what I felt was a red line in
11 terms of how evidence-based policy should be
12 written. But again, that could also be
13 influenced by some of my interpretation of
14 the research and thoughts and experiences.

15 Q. And does the beauty effect
16 feature being on without notifying the user,
17 does that cross a red line?

18 A. Again, it crosses a red line
19 that I think that I held as the mental health
20 policy lead. Again, that also is something
21 that varies drastically in terms of cultural
22 norms. And a lot of societies and cultures,
23 even just like your iPhone camera or your
24 Android or whatever will have retouching
25 built in by default, so it wouldn't be

1 regarded as something that is a universal red
2 line.

3 Q. Does a beauty effect feature
4 being available to minors cross a red line?

5 MR. MATTERN: Objection to
6 form.

7 A. I mean, I think that for me
8 personally, again, that was regardless of age
9 and not minors. I had some specific concerns
10 about minors too, but to me personally, that
11 felt like more of a universal red line.

12 BY MR. MURA:

13 Q. And what specific concerns did
14 you have about minors?

15 A. Minors are typically -- well,
16 so I want to be specific. It's not minors as
17 a whole that I would have as much concern
18 with. It's mostly the, like, adolescent
19 development period just because this is a
20 time when teenagers are particularly
21 susceptible to, like, social influence and
22 social rewards.

23 And so because of the increased
24 paying attention to social contexts, that was
25 something that I was worried about as well as

1 bodies change a lot over puberty, and that
2 can lead -- or that can be associated with,
3 you know, feelings of discomfort as body
4 changes or, you know, social norming against
5 each other.

6 And so because of the context
7 of maturation and development, I think that
8 things that promote a -- or, like, that have
9 a chance of sending a meta message that
10 there's like a correct way to look just
11 seemed riskier to me.

12 Q. Does a beauty effect feature
13 that alters users' facial structure cross a
14 red line?

15 MR. MATTERN: Objection to
16 form.

17 A. That one is a little bit more
18 murky in some ways. I think that the consent
19 issue is important, and then we had
20 recommended that beautifying features that
21 altered facial structure and that couldn't be
22 mimicked with makeup should not be available
23 to users under a certain age just because of
24 that sensitive developmental period.

25 When it gets to adults, I think

1 it can be risky too, but there are still kind
2 of freedom of expression and consent issues
3 there to consider as well.

4 BY MR. MURA:

5 Q. And we read the next sentence
6 to the jury. It reads: As currently
7 implemented, the changes have high potential
8 to lead to negative body image and increase
9 body dysmorphia symptoms, especially among
10 teenage girls.

11 MR. MURA: Can we please
12 underline "high potential to lead to
13 negative body image and increase body
14 dysmorphia symptoms" for the jury, and
15 "especially among teenage girls."

16 BY MR. MURA:

17 Q. Do you see that?

18 A. I do.

19 Q. Does that cross a red line?

20 MR. MATTERN: Objection to
21 form.

22 A. I mean, from a trust and safety
23 perspective, we don't want to cause harm. I
24 think that, like, in terms of, like, high
25 potential to lead to negative body image and

1 increased body dysmorphia symptoms, again,
2 like I want to underscore that it's
3 individual and the science isn't settled
4 there.

5 But this was some -- this was
6 an area where we felt like there was enough
7 research evidence that on the trust and
8 safety mental well-being end, we wanted to
9 really strongly recommend and advocate for
10 the fact that this went against our
11 recommendations and the recommendations of
12 experts.

13 BY MR. MURA:

14 Q. Let's read the next sentence to
15 the jury. It goes on to say, quote: The
16 changes go against past public statements
17 made by our safety communication teams to
18 defend company reputation, and
19 recommendations produced by GR colleagues
20 across multiple regions.

21 Correct?

22 A. Correct.

23 Q. What is GR?

24 A. Government relations.

25 Q. So according to this document,

1 TikTok's safety communications teams or
2 individuals had made public statements in the
3 past to defend the company reputation; is
4 that right?

5 A. I mean, I think that that's the
6 job of a PR branch of a company, so yes, I
7 believe.

8 Q. And were those statements by
9 the PR team about negative body image?

10 A. I honestly don't remember what
11 this referred to directly. I know that we
12 wanted to promote mental well-being and
13 healthy body image and had worked with our PR
14 team to be accurate about how we can
15 communicate thoughtfully about this issue,
16 but I don't know what this is referring to
17 specifically.

18 Q. And according to this document,
19 the beauty -- beautifying effects feature was
20 launched and the launch itself went against
21 those public statements, correct?

22 A. Again, I'd need to know which
23 public statements were actually being
24 directly cited or referenced here, but to my
25 understanding, it went against some public

1 statements that had been made previously by
2 the company or by individuals.

3 And that's part of why I think
4 this wound up being, like -- we wanted, when
5 writing this document, to represent that it
6 wasn't just our safety team that had concerns
7 with it. It also had concerns from other
8 teams about it, and so we were all
9 recommending that this be rolled back, which
10 they did within, I think, 48 hours.

11 Q. What other teams had concerns?

12 A. I think -- let me look back at
13 the signatories, but the effects policy team,
14 global safety communications, outreach and
15 partnerships management, youth safety and
16 well-being, minor safety product management.

17 Q. And this was launched without
18 the involvement of those teams?

19 MR. MATTERN: Objection to
20 form.

21 A. My understanding and
22 recollection is that they hadn't -- the
23 people who at least signed off here had not
24 seen it. I don't know whether some of the
25 teams had ever seen it or not, but I believe

1 it was more of a, like, core product set of
2 signatories that had done the evals and
3 sign-offs versus some of these more
4 specialized TnS teams.

5 BY MR. MURA:

6 Q. And the individuals who signed
7 off here, are they fairly senior individuals
8 on their teams?

9 MR. MATTERN: Objection to
10 form.

11 A. Not necessarily, and I think
12 not necessarily within the overall structure
13 of the company. They were mostly the people
14 who worked most directly with subject matter
15 expert teams, either internally or externally
16 on these issues, so kind of a really
17 specialized and niche corner of the company.

18 BY MR. MURA:

19 Q. So would you agree that they
20 were knowledgeable in this area?

21 A. I mean, I think it depends on
22 which statements you're ascribing them to be
23 knowledgeable of. We wanted to write a
24 well-rounded document, and so, like, I
25 wouldn't necessarily say that, like, some of

1 these individuals are directly knowledgeable
2 about the ins and outs of clinical research,
3 and I wouldn't say that I'm directly
4 knowledgeable of, like, PR or GR concerns
5 just because that's outside of my realm of
6 expertise and job scoping.

7 Q. Fair enough.

8 But the document says that
9 these teams signed off and aligned with the
10 recommendation, correct?

11 A. They did.

12 Q. Okay.

13 A. Well, with the recommended
14 mitigation strategies that we were proposing
15 here, not with the original PRD form, just to
16 clarify.

17 Q. Let's look at the next sentence
18 here. It says: Finally, the changes
19 directly contradict expert recommendations,
20 which are among the most unanimous set of
21 recommendations the Mental Health issue
22 vertical has ever received from external
23 consultations.

24 Did I read that correctly?

25 A. You did.

1 Q. What were those expert
2 recommendations?

3 A. I mean, I'd need to go back and
4 look at the exact wording from the expert
5 recommendations, but to my recollection, that
6 we should not be applying, nonconsensually,
7 changes to a person's facial structure and
8 image, and that, like, effects can be really
9 fun for, like, creativity or, like, have
10 certain purposes, but that -- especially like
11 bone-shaping beautifying effects that are
12 applied without consent are particularly
13 risky.

14 Q. Does it contradict any other
15 recommendations?

16 A. It contradicted our own team's
17 recommendation when we found out that this
18 launched.

19 Q. And the document continues:
20 More experts agree on how we should approach
21 effects than on how we should approach
22 restricting explicit suicide and eating
23 disorder content.

24 Do you see that?

25 A. I do.

1 Q. And the document then says
2 these expert recommendations are, quote: in
3 a topic area that is currently subject to
4 high public scrutiny and legal inquiries in
5 multiple P0 regions with potential to ban
6 TikTok.

7 Do you see that?

8 A. I do.

9 Q. What is a P0 region?

10 A. A P0 region is one that is, to
11 my knowledge, considered to be, like,
12 particularly important for some reason or
13 another, whether it's that there is a
14 specific cultural, you know, norm, value
15 approach there that is -- that makes it more
16 highly sensitive to certain area of policy or
17 recommendations than another, or whether it's
18 because of things like active DAU rates or,
19 like, I don't know, presumably other things
20 that go into a business' calculation of how
21 they judge different regions.

22 That wasn't really something
23 that we paid attention to or, like, were
24 familiar with the calculation of as the
25 policy team. It was put in here to highlight

1 to people who were on the core product and
2 business side that this is a region that they
3 have stated that they care particularly about
4 for whatever reason.

5 Q. And one of the reasons you gave
6 was whether it's because of things like
7 active DAU rates.

8 Can you say more about that?

9 A. If you are -- so this is from
10 my perspective as someone who, like, didn't
11 really have to consider it in my day-to-day
12 recommendations, but if you are launching a
13 change in a region where there is, you know,
14 200 million users versus 20 million users,
15 you are likely to be impacting just a broader
16 segment of the global population than you
17 would be in a different region.

18 So, I don't know, presumably it
19 would impact more people there, but that
20 doesn't make the impact, like, less important
21 from an individual-to-individual basis.

22 Q. And where it says here "with
23 the potential to ban TikTok."

24 Are regions with the potential
25 to ban TikTok typically listed as P0?

1 A. I wouldn't know about those
2 calculations. I think we just highlighted
3 there because there was a lot of
4 back-and-forth around banning TikTok in the
5 US at this point, and again, we wanted to
6 ensure that the people with more of the
7 business side who might read this document
8 were -- you know, we had highlighted that
9 this is also something that they talk about.

10 Q. So the United States was one of
11 the P0 regions contemplated in the sentence?

12 A. I believe so, especially
13 because we were talking specifically about
14 changes that had impacted the US, among other
15 regions.

16 Q. I'd like to go to the -- just
17 below this paragraph, there's a table.

18 Do you see that?

19 A. I do see that.

20 Q. And the far-left column in the
21 table says Launch Feature.

22 Do you see that?

23 A. I do see that.

24 Q. And the next column is
25 Risk/Harm Severity.

1 Do you see that?

2 A. I do see that.

3 Q. And then it says Key Concerns.

4 Do you see that?

5 A. I do see that.

6 Q. And followed by Suggested

7 Changes to Mitigate Risk?

8 A. I do see that.

9 Q. Followed by Benefits of

10 Implementing the Proposed Change?

11 A. I do see that.

12 Q. And finally, Suggested Time

13 Frame?

14 A. I do see that.

15 Q. And that's the suggested time
16 frame for the proposed change; is that right?

17 A. Yes.

18 Q. So this table represents the
19 trust and safety team's opinions about how to
20 approach various aspects of Beauty Retouching
21 panel; is that right?

22 A. It represents the opinions and
23 recommendations of the specific trust and
24 safety teams that had signed off on it.

25 Trust and safety is a massive organization

1 with a ton of different functions, and so
2 this was primarily the ones who had checked
3 off the boxes.

4 Q. Okay. The ones who checked off
5 the boxes, that's on the first page?

6 A. That is.

7 MR. MURA: Okay. Can we go
8 back to that first page for one second
9 and blow it up. Just the checked
10 boxes, please, and the team signed
11 off.

12 BY MR. MURA:

13 Q. Is this the checked boxes that
14 you're referring to?

15 A. These are the checked boxes
16 that I'm referring to.

17 Q. And the first name is your
18 name; is that correct?

19 A. It is.

20 Q. Global Mental Health Issue
21 Policy?

22 A. Yes.

23 Q. And then we have North America
24 Regional Mental Health Policy?

25 A. Yes.

1 Q. TnS Global Safety
2 Communications?

3 A. Yes.

4 Q. Global Effects Feature Policy?

5 A. Yes.

6 Q. Global Mental Health Outreach
7 Partnerships Manager?

8 A. Yes.

9 Q. Global Youth Safety and
10 Well-Being?

11 A. Yes.

12 Q. North America Youth Safety and
13 Well-Being Policy Manager?

14 A. Yes.

15 Q. Minor Safety Product
16 Management?

17 A. Yes.

18 Q. USDS Product Policy?

19 A. The interim, yes.

20 Q. USDS Issue Policy?

21 A. Yes.

22 Q. And these were the groups --
23 none of them were consulted before the
24 launch, correct?

25 A. To my knowledge, no.

1 Q. Okay. Let's go back to the
2 charts. It's at the bottom of 311. Thank
3 you.

4 So the first feature listed in
5 this table, it says filters: are turned on
6 by default for all users, including minors.

7 Do you see that?

8 A. I do see that.

9 Q. And according to the document,
10 this feature had a, quote: high risk of
11 causing severe psychological harm.

12 Is that right?

13 A. Yes.

14 Q. This document also says that
15 one of the reasons this feature had a high
16 risk of harm is that, quote: For users who
17 are posting, this feature, quote, may
18 increase the risk of feelings of body
19 dissatisfaction or body dysmorphia.

20 Do you see that?

21 A. Yes.

22 Q. Did TikTok ever tell parents or
23 children that it had designed and launched a
24 feature that may increase the risk for
25 feelings of body dissatisfaction and body

1 dysmorphia?

2 MR. MATTERN: Objection to

3 form.

4 A. I don't know what TikTok did or
5 did not communicate. This was an A/B test
6 and not a full-feature launch, and so I don't
7 know what the processes were for that.

8 BY MR. MURA:

9 Q. But this feature was available
10 publicly to some users, correct? We saw a
11 video where it does --

12 A. I mean, I think like in terms
13 of A/B testing, yes. For the users that had
14 been assigned to the group, it would have
15 been on their specific profiles if they had
16 updated.

17 Q. Okay. And it says here that
18 there was a high risk of causing severe
19 psychological harm to users, to TikTok users,
20 from this feature, correct?

21 A. It does say that.

22 Q. Okay. And so my question is:
23 To your knowledge, did TikTok ever tell
24 parents or children that it had launched a
25 feature that may increase the risk of

1 feelings of body dissatisfaction and body
2 dysmorphia?

3 MR. MATTERN: Objection to
4 form.

5 A. I don't know since I wasn't
6 involved in product or A/B test launch
7 communications.

8 BY MR. MURA:

9 Q. Okay. And then we have trust
10 and safety's recommendation for this feature
11 was to make it default to off, correct?

12 A. That was one of the
13 recommendations that we made.

14 Q. Okay. Turning the feature to
15 be off by default would not do any harm that
16 the feature had already done, correct?

17 MR. MATTERN: Objection to
18 form.

19 A. I'm not sure that I understand
20 the question as stated. Can you restate it?

21 MR. MURA: I'll strike it.

22 BY MR. MURA:

23 Q. Let's look at the next row at
24 the bottom of 313. Do you see this other
25 table? Do you see where it says that instead

1 of being default on, the Beauty Retouching
2 panel would just be made available to users
3 of all ages?

4 A. Yes, I do.

5 Q. Okay. And right next to that
6 option, the table says that it would pose a
7 medium risk to users.

8 Do you see that?

9 A. I do.

10 Q. Okay. So trust and safety had
11 made a recommendation, and that
12 recommendation would still result -- would
13 still pose a medium risk of harm, correct?

14 MR. MATTERN: Objection to
15 form.

16 A. I wouldn't characterize it as
17 trust and safety as a whole making a
18 recommendation. Again, it was very specific
19 teams within trust and safety, including my
20 own.

21 And what our thoughts of -- our
22 thoughts were from consultation with experts
23 and from our read of the literature is that
24 this carried risk, especially to minors, for
25 specific types of changes.

1 BY MR. MURA:

2 Q. Okay. So the suggestion was to
3 adopt this change, and the analysis was this
4 would pose a medium risk to users, correct?

5 A. Overall, a medium risk, but
6 specific elements of the panel would have
7 been low risk and certain elements would have
8 been potentially higher risk, which is why
9 some of the recommendations went into further
10 detail about which specific types of effects
11 and recommendations we were requesting or
12 recommending to have, like, disabled, made
13 available, not made available, et cetera,
14 based on our read of the literature and
15 recommendations.

16 There's a trade-off here
17 between, like, safety expression, benefits
18 and harm in that there are -- there is some
19 research about certain types of effects or
20 appearance changes actually also leading to
21 beneficial outcomes, and so we wanted to be
22 really scoped in the recommendations that we
23 were making to align with experts and the
24 strength of research evidence that was
25 presented.

1 Q. And next to where it says
2 medium, there's a third column.

3 Do you see that?

4 A. I do.

5 Q. And this third column indicates
6 that this feature, quote, may have
7 disproportionate negative impact on minors.

8 Do you see that?

9 A. I do see that.

10 Q. And then the document
11 recommendations, quote, immediate age-gating
12 here.

13 Do you see that?

14 A. Yes, I believe that we
15 recommended age-gating for appearance-focused
16 structural changing effects to be set in
17 consultation with the teams that had
18 specialized knowledge within these areas and
19 consultations with experts.

20 Q. And immediate age-gating here
21 would mean that only users whose birth date
22 indicated that they were adults could use the
23 feature; is that correct?

24 A. We didn't give any specific age
25 ranges here in this recommendation, and

1 again, it depends on which specific effect
2 from the retouch panel you were talking
3 about, but for things like structural
4 reshaping, that would have been something
5 that we recommended be gated to 18 or older
6 users, just because we felt like it was a
7 riskier time period for them.

8 Q. And when you say because we
9 felt that like it was a riskier period for
10 them, you're referring to anyone under 18?

11 A. I'm referring to adolescents as
12 a whole because of the maturation process.
13 Again, it's very individual in terms of
14 person to person and context to context about
15 how it actually will impact someone is what
16 we see from the feature.

17 But just overall, considering
18 the population and the life stage, it seemed
19 like it would be something that might have,
20 like, possibilities of increased risk.

21 MR. MURA: David, I promised
22 you lunch at around this time.

23 MR. MATTERN: Can we go off the
24 record?

25 MR. MURA: Let's go off the

1 record.

2 THE VIDEOGRAPHER: The time is
3 now 12:13. Going off the record.

4 (Recess taken, 12:13 p.m. to
5 12:56 p.m. PDT)

6 THE VIDEOGRAPHER: The time is
7 now 12:56. Back on the record.

8 BY MR. MURA:

9 Q. Ms. Linthicum, I'll just remind
10 you you're under oath.

11 A. Yes.

12 Q. Okay. Thank you.

13 We were talking about this
14 chart that's displayed in front of you.

15 Do you see the fourth column
16 where it says "Specifically"? It's the entry
17 where it says "short-term"?

18 A. I'm sorry, I think I'm on the
19 wrong -- yes, I do.

20 Q. Okay. And here the document
21 recommends, quote: allowing access to makeup
22 retouching options, and potentially
23 skin-smoothing, blemish removing options, but
24 no other retouching features.

25 Do you see that?

1 A. I do see that.

2 Q. And when it says "no other
3 retouching features," those are changes that
4 would be to underlying facial structures; is
5 that right?

6 A. Yes, the next i.e. clarifies
7 that that's what we were referring to.

8 Q. And this launch had included
9 filters that changed underlying facial
10 structures, right?

11 A. I believe it had, and that's
12 why we were concerned about it.

13 Q. And the next entry in the
14 table -- this is ending on 315, so if you
15 turn over a couple of pages, do you see where
16 it says "Structural reshaping"?

17 A. I do.

18 Q. And this table shows some of
19 the structural reshaping features or goes
20 over them; is that right?

21 A. Yes.

22 Q. And it says: Structural
23 reshaping of the face available, in
24 parentheses, face roundness, eyes, nose,
25 lips, brows.

1 Do you see that?

2 A. I do see that.

3 Q. And right next to that it says
4 "high" for the risk.

5 Do you see that?

6 A. I do see that.

7 Q. And then it explains: High
8 risk of causing severe psychological harm to
9 TikTok users.

10 Do you see that?

11 A. I do see that.

12 Q. So structurally reshaping of
13 the face, according to this document, this
14 feature had a high risk of causing severe
15 psychological harm, correct?

16 A. I think it depends on the,
17 like, exact individual and the, you know,
18 person that you're talking about, but we
19 considered it to be something that was
20 relatively higher to the extreme end of risk
21 on the risk scales that we were using.

22 Q. And this feature may increase
23 risk of user feelings of body
24 dissatisfaction.

25 That's what the document says,

1 correct?

2 A. Yes. In research, not TikTok
3 specific, but more generally, it seemed I had
4 read some studies that were fairly well
5 designed that showed that there were
6 associations of negative body image in
7 certain individuals with increased use of
8 facial restructuring features, and so that's
9 why it says it may increase risks for users.

10 Q. And according to this document,
11 this feature may increase risk of user
12 feelings of body dysmorphia; is that right?

13 A. Yes, it says that, again, based
14 on more general research, not TikTok
15 specific.

16 Q. And according to this document,
17 this feature may increase users' desire for
18 cosmetic surgery.

19 Do you see that?

20 A. I do see that.

21 Q. And it continues on to the next
22 page. According to this document, this
23 feature may increase users' drive for
24 thinness.

25 Do you see that?

1 A. I do see that.

2 Q. And according to this document,
3 it may increase risk of eating disorder
4 symptoms.

5 Do you see that?

6 A. I do see that.

7 Q. To your knowledge, did TikTok
8 inform children or parents that restructuring
9 your face's roundness or eyes or nose or lips
10 or brows, any structural reshaping, had a
11 high risk of causing these severe
12 psychological harms?

13 MR. MATTERN: Objection to
14 form.

15 A. I don't know.

16 BY MR. MURA:

17 Q. Let's look at the next feature,
18 which is on page 317 -- the next table,
19 excuse me.

20 Do you see on the left where it
21 says users recording a video are not notified
22 that their faces are retouched?

23 A. It says: Users recording with
24 the camera are not notified on main screen
25 that their face has been retouched.

1 Q. Thank you.

2 Do you see that?

3 A. I do see that.

4 Q. Okay. And then it says that
5 the risk is high.

6 Do you see that?

7 A. I do see that.

8 Q. Did TikTok ever tell parents or
9 children that there was a high risk of harm
10 associated with launching filters that
11 defaulted to on with no indication that a
12 user's face was being retouched?

13 MR. MATTERN: Objection to
14 form, characterizes document.

15 A. I don't know about that, and I
16 think there's also some confusion in this
17 document and other questions about filters
18 versus effects, and those are sometimes used
19 interchangeably and sometimes not used
20 interchangeably. And there were some that
21 were always shown with labels that they had
22 been applied and some that were not.

23 BY MR. MURA:

24 Q. And, to your knowledge, are you
25 aware whether TikTok ever informed parents or

1 children of the information that we're
2 reviewing now?

3 A. I don't know.

4 MR. MATTERN: Objection to
5 form.

6 THE WITNESS: Oh, sorry.

7 BY MR. MURA:

8 Q. And this feature contradicted
9 expert recommendations, correct?

10 MR. MATTERN: Objection to
11 form.

12 A. It contradicted recommendations
13 that we had solicited, like practically
14 solicited from external organizations and
15 received from some groups that we had
16 consulted with.

17 BY MR. MURA:

18 Q. So TikTok had solicited expert
19 recommendations on these topics?

20 A. Yes. Well, we had a roster of
21 external experts that we consulted on topics
22 to do with suicide, body image, more
23 generally, mostly from the product policy
24 perspective, because we wanted to make sure
25 that the changes that we were making or the

1 recommendations that we were making were
2 evidence informed and in line with not just,
3 you know, what folks internal to the company
4 would say, but also with what some of the
5 leading researchers in the world would
6 characterize the evidence as.

7 Q. And this feature was launched
8 even though it does not align with those
9 expert recommendations, correct?

10 MR. MATTERN: Objection to
11 form.

12 A. I would have to look back to
13 understand when different consultations
14 occurred, but in general, we had concerns
15 over this feature contributing to negative
16 body image, and we had had some consultations
17 around different, like, approaches to effects
18 that might increase or reduce risk of these
19 effects to users, so presumably.

20 BY MR. MURA:

21 Q. And so your answer is
22 presumably?

23 A. Can you repeat the main
24 question?

25 Q. Well, just to be clear, this

1 document says that this feature does not
2 align with expert recommendations, correct?

3 A. Yes, I think it didn't align
4 with our understanding and our conversation
5 with experts about the best practices for
6 filters and effects as a whole.

7 I don't recall whether the
8 statement was specific to any consultations
9 that we had done about this in particular
10 versus effects policy as a whole, which were
11 different.

12 Q. And according to this document,
13 users were not notified when they're watching
14 content where other people's faces have been
15 retouched, correct?

16 A. Can you state where you're
17 looking at?

18 Q. This is -- yes. Let's move on
19 to the next page, my apologies, 318.

20 A. Hmm.

21 Q. And do you see there's a table
22 that says: Users viewing content recorded by
23 others are not notified when retouching has
24 been applied?

25 A. I do see where it says that. I

1 want to be specific there in the context of
2 your earlier question of this is very
3 specific to the retouching feature that was
4 involved in this A/B test for effects as a
5 whole.

6 There were stickers with links
7 to the effects that were applied to the
8 corner of the videos where users were using
9 those effects, so I just want to be really
10 clear about what this is referring to
11 specifically in terms of user -- other users
12 not being notified that a retouching has been
13 applied.

14 Q. Okay. And it says that that
15 risk is high, correct?

16 A. Yes.

17 Q. Did TikTok ever warn users that
18 there was a high risk of harm associated with
19 launching filters that defaulted to on with
20 no indication that they were watching videos
21 that had been retouched?

22 MR. MATTERN: Objection to
23 form.

24 A. I don't know.

25 ///

1 BY MR. MURA:

2 Q. Let's look at the page ending
3 in 319, please, the next page. The table
4 that starts with the word "Effects."

5 Do you see that?

6 A. I do.

7 Q. And it says: Effects of
8 minimally invasive cosmetic procedure
9 available, parentheses, skin smoothing and
10 retexturing, teeth whitening, undereye
11 lightening.

12 Do you see that?

13 A. I do.

14 Q. And this document recommends
15 that the filters that structurally altered
16 users' faces be made unavailable.

17 Do you see that?

18 A. Can you point me to where
19 you're looking?

20 Q. Yes.

21 MR. MURA: Can we go off the
22 record?

23 THE VIDEOGRAPHER: The time is
24 now 1:07. Going off the record.

25 (Recess taken, 1:07 p.m. to

1 1:09 p.m. PDT)

2 THE VIDEOGRAPHER: The time is
3 now 1:09. Back on the record.

4 MR. MURA: I can strike that
5 last question and ask you a different
6 question.

7 BY MR. MURA:

8 Q. So looking at page 319, it
9 discusses effects of minimally invasive
10 cosmetic procedures available.

11 Do you see that?

12 A. I do see that.

13 Q. And it says: Skin smoothing
14 and retexturing, teeth whitening, undereye
15 lightening.

16 Do you see that?

17 A. I do see that.

18 Q. And the document indicates that
19 these retexturing features have a medium to
20 high risk of harm.

21 Do you see that?

22 A. I do see that.

23 Q. And it says next to that
24 column: May increase risk of psychological
25 harm to users, including feelings of body

1 dissatisfaction, body dysmorphia, desire to
2 engage in low-risk cosmetic procedures.

3 Do you see that?

4 A. I do see that.

5 Q. Did TikTok ever inform parents
6 or children that these retouching features
7 had a medium to high risk of causing
8 psychological harm?

9 MR. MATTERN: Objection to
10 form.

11 A. I don't know.

12 BY MR. MURA:

13 Q. If we go down to the feature
14 spanning pages 319 to 320, do you see on the
15 left-hand column it says: Preset, default
16 filter settings are applied to users' faces
17 when they open the retouch menu?

18 A. I do see that.

19 Q. And we saw in the video before
20 that the user -- the user, the individual
21 there, had talked about having their teeth
22 automatically whitened on a scale.

23 Do you remember that?

24 A. I do remember that.

25 Q. I believe the number was 20.

1 A. That seems like, yes.

2 Q. And the article continues:

3 "Put in the context of the pandemic, teens
4 are on social media more. That means they're
5 potentially exposed to more content that
6 could potentially trigger the development or
7 maintenance of an eating disorder." Numerous
8 studies have documented the negative effects
9 of social media on people with eating
10 disorders, but there are some especially
11 concerning aspects specific to TikTok.

12 Did I read that correctly?

13 A. I believe so, from the article.

14 Q. Okay. Let's turn to Tab 32.

15 And this is TIKTOK3047MDL-060-01155277, which
16 I'm marking as Exhibit 17.

17 (Whereupon,
18 TikTok-Linthicum-17, Brief Summary for
19 Negative Affect Project Mar 9,
20 TIKTOK3047MDL-060-01155277 -
21 TIKTOK3047MDL-060-01155279, was marked
22 for identification.)

23 BY MR. MURA:

24 Q. The metadata of this document
25 reflects it was found in your files.

1 Do you have any reason to
2 dispute that?

3 A. No reason to dispute.

4 Q. And the title of this document
5 is "Brief summary for negative affect
6 project, March 9th."

7 Do you see that?

8 A. I do see that.

9 Q. And it says Project Background.

10 Do you see that?

11 A. I do.

12 Q. And it says: In July 2021,
13 WSJ, Wall Street Journal, flagged TikTok's
14 algorithms revealed the risk of users
15 entering, quote, rabbit holes, i.e., filter
16 bubbles, where users may get stuck in a loop
17 of content featuring negative affect. So we
18 initiated this project.

19 Do you see that?

20 A. I do see that.

21 Q. Do you recall working on a
22 response to this Wall Street Journal article?

23 A. I recall examining the
24 methodology and claims that the article made.
25 I don't know whether I worked, like, directly

1 on the responding to the article or the comms
2 team, but I was very involved in helping to
3 design the safety features and mitigation
4 mechanisms for the behaviors that we didn't
5 want to see or were considered to be not
6 ideal from a well-being perspective after the
7 article came out.

8 Q. And according to this document,
9 TikTok initiated a project to address rabbit
10 holes after the Wall Street Journal published
11 this article about TikTok's algorithm and the
12 risk of rabbit holes, correct?

13 MR. MATTERN: Objection to
14 form.

15 A. I believe that it would have
16 been around that time we became aware of --
17 or at least I became aware of that and was
18 drawn into the project after that
19 publication.

20 BY MR. MURA:

21 Q. Let's bring up Tab 33. This is
22 TIKTOK3047MDL-128-LARK-06658443, and I'm
23 marking that as Exhibit 18.

24 (Whereupon,
25 TikTok-Linthicum-18, [P&C] XFN WSJ

Escalations Bi-Weekly Sync Lark Document, TIKTOK3047MDL-128-LARK-06658443 - TIKTOK3047MDL-128-LARK-06658471, was marked for identification.)

BY MR. MURA:

Q. The metadata reflects this document was found in your files. Do you have any reason to dispute that?

A. No.

Q. And this document is entitled [P&C] XFN Wall Street Journal Escalations Biweekly Sync.

Do you see that?

A. I do see that.

Q. And can you explain what P&C XFN means?

A. P&C means private and confidential or privileged and confidential -- I forget what the actual technical term is. And XFN means cross-functional, so people who were from different functions across the company.

Q. And biweekly sync refers to meeting biweekly; is that correct?

1 A. Approximately biweekly. I
2 think that meetings get pushed around a lot,
3 so I wouldn't say that it was exactly every
4 biweekly on the dot.

5 Q. Okay. And this was a regular
6 cross-functional team meeting; is that fair?

7 A. I believe so, for the course of
8 the project. There were a lot of different
9 resources and job functions that had to be
10 involved in this project, and so it was
11 helpful to coordinate across all of the
12 different departments that were working to
13 improve this.

14 Q. Okay. And it says: Wall
15 Street Journal Escalations in the title, and
16 a little -- if you go down in the document,
17 you'll see Wall Street Journal escalations
18 again.

19 Do you see that?

20 A. I do.

21 Q. And it says: Wall Street
22 Journal published three articles in the past
23 stating that the TikTok algorithm would lead
24 people into a negative filter bubble that is
25 hard to escape.

1 Do you see that?

2 A. I do see that.

3 Q. So this was -- these were
4 meetings in relation to this Wall Street
5 Journal escalation; is that correct?

6 A. They weren't directly about the
7 Wall Street Journal escalation articles.
8 They were more so about the evolution of the
9 safety strategy and the recommendation
10 mitigation and the, like, technical changes
11 that were being made, in part, to, like,
12 mitigate and respond to some of the behavior
13 that was seen in the Wall Street Journal
14 articles.

15 Q. And above that it says:
16 Meeting US Safety, Algo.

17 Do you see that?

18 A. Yes.

19 Q. So is that indicating that this
20 was a cross-functional team that consisted of
21 employees from trust and safety and the
22 algorithm team?

23 A. I believe so.

24 Q. And do you see the first topic
25 titled Negative Filter Bubble Project

1 Background?

2 A. Yes.

3 Q. Okay. And that refers to the
4 Wall Street Journal escalations, correct?

5 A. I think it refers to the issue
6 of negative filter bubbles as a whole.

7 Q. Let's go to Tab 34. I'm
8 marking TIKTOK3047MDL-028-00830053 as
9 Exhibit 19.

10 (Whereupon,
11 TikTok-Linthicum-19, Dispersion
12 Working Group Presentation,
13 TIKTOK3047MDL-028-00830053 -
14 TIKTOK3047MDL-028-00830065, was marked
15 for identification.)

16 BY MR. MURA:

17 Q. And the metadata reflects that
18 this was in your files.

19 Any reason to dispute that?

20 A. No reason to dispute.

21 Q. And this is a PowerPoint
22 presentation by the, quote, Dispersion
23 Working Group, correct?

24 A. Yes.

25 Q. And the dispersion working

1 group was working to address rabbit holes on
2 TikTok; is that correct?

3 A. Not exactly. So this was a
4 working group that was set up because there
5 were -- there were a series of groups that
6 were set up to address rabbit holes or filter
7 bubbles for certain topics, but each of those
8 groups had functioned sometimes
9 independently, sometimes overlapping each
10 other, and so what we needed was a more
11 general unified strategy for how to use
12 dispersion as a tool in the policy and safety
13 bucket as well as more of a templated run
14 book for people who were interested in
15 leveraging it to address issues within their
16 topic.

17 So this was a working group
18 that was set up more within the product
19 policy team to look at the process and speed
20 up and align how teams could launch
21 dispersion projects in a way that was, you
22 know, faster, lower effort cross-functionally
23 and more standardized in terms of what they
24 were being used to mitigate concerns of.

25 Q. And this slide deck is from --

1 this PowerPoint presentation is from February
2 2023.

3 Do you see that?

4 A. Yes.

5 Q. And do you see your name there?

6 A. Yes.

7 Q. You're one of the presenters?

8 A. I was.

9 Q. And can you turn to one slide
10 over -- actually, slide 4, I believe. It's
11 page 4.

12 Do you see on this slide the
13 headlines from Wall Street Journal articles?

14 A. Yes.

15 Q. So on the bottom of this slide,
16 it says: Inside TikTok's Algorithm: A Wall
17 Street Journal Video Investigation.

18 Do you see that?

19 A. I see that title.

20 Q. And then at the top do you see:
21 "The Corpse Bride Diet": How TikTok
22 Inundates Teens With Eating Disorder Videos.

23 Do you see that?

24 A. I do see that. It's a little
25 bit different from the methodology that was

1 used, but I see that that's the title of the
2 article that they went with.

3 Q. And do you see another article
4 in the middle on the right, the print is
5 smaller, but it says: How TikTok Serves Up
6 Sex and Drug Videos to Minors.

7 Do you see that?

8 A. I do.

9 Q. Was the Wall Street Journal
10 reporting the first time you became aware of
11 rabbit holes?

12 A. It was the first time that I
13 became aware of rabbit holes within the
14 TikTok context and applied with this specific
15 definition.

16 The concept of rabbit holes as
17 a whole I had heard of before, primarily
18 associated with political party, political
19 affiliation and, like, political posts on
20 other platforms.

21 Q. Please pull up Tab 35, which I
22 will mark as Exhibit 20.

23 (Whereupon,

24 TikTok-Linthicum-20, Wall Street

25 Journal Video, How TikTok's Algorithm

1 Figures You Out, Media File, was
2 marked for identification.)

3 BY MR. MURA:

4 Q. I'm introducing a YouTube video
5 as Exhibit 20. I can hand you a printout of
6 the title card. I'll represent to you this
7 is the YouTube video of the Wall Street
8 Journal titled How TikTok's Algorithm Figures
9 You Out.

10 A. Thank you.

11 Q. Do you recall watching this
12 video before?

13 A. I do believe I watched it, yes.

14 Q. Okay. We're going to play a
15 portion from 0:24 to 1:32 for the jury, and
16 then I'll have some questions for you, okay?

17 A. Okay.

18 (Whereupon, the media was
19 played in the deposition room.)

20 BY MR. MURA:

21 Q. The Wall Street Journal
22 investigation, when it was discussing rabbit
23 holes, it was, in part, discussing rabbit
24 holes about themes of sadness and heartache.

25 Do you remember that?

1 MR. MATTERN: Objection to
2 form.

3 A. I remember the Wall Street
4 Journal article had some of those themes
5 highlighted -- or one of them did.

6 BY MR. MURA:

7 Q. And those types of videos,
8 TikTok referred to them as, quote, negative
9 affect, quote; is that right?

10 A. Those were some of the subsets
11 of videos that comprised negative affect
12 videos. It wasn't always around those
13 specific themes. Mostly it was aligned with
14 what we think of as negative affect more in
15 the cycle, and so like some videos that,
16 like, for instance, had like -- like, themes
17 of loneliness or isolation or things like
18 that would also be considered negative affect
19 even if they were not necessarily within the
20 categories that you just mentioned.

21 MR. MURA: Next let's play
22 minute 1:37 to 3:41 for the jury.

23 (Whereupon, the media was
24 played in the deposition room.)

25 MR. MATTERN: I'm just going to

1 reported was about the depression and mental
2 health videos, and those were the proportions
3 that they stated.

4 BY MR. MURA:

5 Q. And it said that the bulk of
6 the remaining 7% of the videos were ads,
7 correct?

8 A. That's what they reported.

9 Q. Okay. Let's go to Tab 36, and
10 we'll mark this as Exhibit 21.

11 (Whereupon,
12 TikTok-Linthicum-21, Wall Street
13 Journal Article, How TikTok Serves Up
14 Sex and Drug Videos to Minors, was
15 marked for identification.)

16 BY MR. MURA:

17 Q. This is a copy of a Wall Street
18 Journal article, correct?

19 A. It appears to be so.

20 Q. And the title is How TikTok
21 Serves Up Sex and Drug Videos to Minors,
22 correct?

23 A. That's what it looks like.

24 Q. And the -- right underneath the
25 title it says: The popular app can quickly

1 drive young users into endless spools of
2 adult content, including videos touting drug
3 use and promoting pornography sites.

4 Do you see that?

5 A. That's what it says.

6 Q. And this was one of the
7 articles that was featured in the PowerPoint
8 we looked at before, where you were a
9 participant in that PowerPoint.

10 Do you remember that?

11 A. Yes. I think that that was one
12 of the headlines that had been pulled into
13 that. This area wasn't one that I had worked
14 on directly because it was outside of my
15 issue area, but that working group had
16 members who had worked on that previously.

17 Q. And this article is from
18 September 8th, 2021; is that correct?

19 A. That's what it appears like
20 based on the date listed.

21 Q. Do you recall reading this
22 article at the time?

23 A. I honestly don't remember if I
24 actually read this article or not at the
25 time. It was of interest given the Wall

1 Street Journal reporting, but this wasn't my
2 issue area and I wasn't focused on minors, so
3 I don't know whether I read the article or
4 read it in full or not.

5 Q. Let's pull up Tab 37 next, and
6 this is Exhibit 22.

7 (Whereupon,
8 TikTok-Linthicum-22, Wall Street
9 Journal Article, The Corpse Bride
10 Diet: How TikTok Inundates Teens with
11 Eating-Disorder Videos, was marked for
12 identification.)

13 BY MR. MURA:

14 Q. This is another article from
15 the Wall Street Journal; is that correct?

16 A. It appears so.

17 Q. And the title of this article
18 is "The Corpse Bride Diet": How TikTok
19 Inundates Teens With Eating Disorder Videos.

20 Do you see that?

21 A. Yes, I see that.

22 Q. And underneath it, it says:
23 The app's algorithm can send users down
24 rabbit holes of narrow interest, resulting in
25 potentially dangerous content such as

1 emaciated images, purging techniques,
2 hazardous diets and body shaming.

3 Do you see that?

4 A. I do see that.

5 Q. And this is from December 17th,
6 2021?

7 A. That's what it looks like.

8 Q. Do you recall reading this
9 article?

10 A. I do remember reading this
11 article. This was within my issue area.

12 Q. And were you aware of the
13 problems raised in this article before
14 reading it?

15 MR. MATTERN: Objection to
16 form.

17 A. I don't believe so
18 specifically.

19 BY MR. MURA:

20 Q. And this was one of the
21 articles that prompted TikTok to address
22 rabbit holes, correct?

23 MR. MATTERN: Objection to
24 form.

25 A. We wanted to address rabbit

1 holes, and this was one of the articles that
2 placed increased emphasis on this being an
3 issue for this specific type of content.

4 And so, yes, it's one of the
5 articles that pushed us to include parameters
6 around this as a part of our overall strategy
7 from the policy team of addressing body image
8 and eating disorder issues.

9 BY MR. MURA:

10 Q. Let's pull up Tab 38, which
11 we'll mark as Exhibit 23.

12 (Whereupon,
13 TikTok-Linthicum-23, ED - Response to
14 Shou Lark Document,
15 TIKTOK3047MDL-078-LARK-01859676 -
16 TIKTOK3047MDL-078-LARK-01859682, was
17 marked for identification.)

18 BY MR. MURA:

19 Q. This is
20 TIKTOK3047MDL-078-LARK-01859676. And I'll
21 represent to you that this came from your
22 files.

23 Any reason to dispute that?

24 A. No reason to dispute that.

25 Q. Do you remember this document?

1 A. I don't remember this document
2 specifically, but I remember working on some
3 of the CCDH report, and so it's natural that
4 I would have been probably tagged or
5 potentially written part of this.

6 Q. And the title says ED. Is that
7 eating disorder?

8 A. I believe it is eating disorder
9 in this context.

10 Q. And Response to Shou. Would
11 that be Shou Chew, the CEO?

12 A. Yes.

13 Q. Can you turn to the page ending
14 in 678. There is a bullet at the bottom that
15 says: Feed dispersion.

16 Do you see that?

17 A. Yes.

18 Q. And it says: Following
19 multiple escalations in 2021 that said
20 TikTok's FYP sent users -- that's the For You
21 feed?

22 A. FYP is For You Page.

23 Q. For You Page, excuse me.
24 Right.

25 That TikTok's For You Page sent

1 users into filter bubbles of eating disorder
2 and extreme diet and fitness, EDF, content,
3 in November 2022 we launched feed dispersion
4 efforts for such content in 60 global
5 English-language markets.

6 Do you see that?

7 A. I do see that.

8 Q. What is feed dispersion?

9 A. Feed dispersion was a project
10 that we worked on in collaboration with the
11 policy team and the algo teams to essentially
12 rate limit the presentation of videos that
13 matched a certain topic area that policy had
14 decided would not be ideal to have clustered
15 together.

16 So instead of, you know,
17 potentially having, like -- having multiple
18 videos with themes of, like, diet and fitness
19 together in a row, it would ideally rate
20 limit to no more than, like, one out of
21 eight, one out of every 16, kind of whatever
22 you set it to, in terms of videos that had
23 those themes and content that were presented
24 within a For You feed load.

25 Q. So the next sentence says:

1 This has resulted in an improvement in EDF
2 bubble users by 52%.

3 Do you see that?

4 A. I do see that.

5 Q. That's extreme diet and fitness
6 bubble users, correct?

7 A. I believe so. I don't know
8 what exactly the sample is or the percent
9 that is being referred to here. That's just
10 not something I remember from that time.

11 Q. Well, right above it says
12 "extreme diet and fitness" and then "EDF" in
13 quotes, and then it uses EDF again. So fair
14 to assume that that's what it's referring to?

15 A. I agree that EDF means extreme
16 diet and fitness in both contexts.

17 Q. Okay. Even after the solution
18 was implemented, it was still possible for
19 the algorithm to push a user into an eating
20 disorder rabbit hole.

21 Correct?

22 MR. MATTERN: Objection to
23 form.

24 A. I don't know. Again, like,
25 looking at this sentence, I'm not sure what

1 don't recall?

2 MR. MATTERN: Objection to
3 form.

4 A. My testimony is that there
5 were -- to my knowledge, there were
6 dispersion interventions that had been
7 launched at that time as well as a suite of
8 policies that directly related to suicide and
9 self-harm because you tailor the approach to
10 the individual components of the topic at
11 hand.

12 BY MR. MURA:

13 Q. Let's look at Tab 46. This is
14 TIKTOK3047MDL-150-LARK-07275923, and we're
15 marking this as Exhibit 30.

16 (Whereupon,
17 TikTok-Linthicum-30, (P&C) P0:
18 Businessweek feature - March 10
19 deadline Lark Document,
20 TIKTOK3047MDL-150-LARK-07275923 -
21 TIKTOK3047MDL-150-LARK-07275929, was
22 marked for identification.)

23 BY MR. MURA:

24 Q. I'll represent to you that this
25 came from your files.

1 Any reason to dispute that?

2 A. No reason to dispute that.

3 Q. This is a Lark chat, correct?

4 A. Yes, it looks like a Lark chat.

5 Q. And the title is (P&C) P0:

6 Businessweek feature - March 10 deadline.

7 Do you see that?

8 A. I see that.

9 Q. What is P&C?

10 A. I think privileged and

11 confidential.

12 Q. And P0 is -- you testified
13 about this before. Is it fair to say it's
14 high priority?

15 A. Yes, relative to other rankings
16 here.

17 Q. And when it says confidential,
18 that means it was not supposed to be released
19 outside of this group; is that fair?

20 MR. MATTERN: Objection to
21 form.

22 A. I don't think it had to do with
23 release beyond the group itself. I think
24 that it had to do with whether lawyers were
25 weighing in about the matter or not. But I

1 didn't title the Lark chat, so I'm not a
2 hundred percent sure.

3 BY MR. MURA:

4 Q. But this was confidential to
5 TikTok, correct?

6 MR. MATTERN: Objection to
7 form.

8 A. As far as I know about how
9 confidentiality works as a nonlawyer,
10 presumably.

11 BY MR. MURA:

12 Q. Well, you were careful not to
13 share this with the public, right?

14 MR. MATTERN: Objection to
15 form.

16 A. I was careful not to share any
17 of my work with the public because I work
18 behind the scenes, unless I was representing
19 TikTok as a spokesperson.

20 BY MR. MURA:

21 Q. So do you see at the bottom of
22 page 1 where Suzy Loftus says: Can we please
23 add Ryn Linthicum?

24 A. I do see that.

25 Q. And Suzy Loftus, is that the

1 head of USDS Trust and Safety?

2 A. I don't remember her exact
3 title, but she was high up in USDS Trust and
4 Safety. I think maybe on the risk and
5 response side originally. I'm not sure if it
6 was over the whole org.

7 Q. And you used an emoji and
8 appear to be part of this Lark chat; is that
9 fair?

10 A. Yes.

11 Q. And this chat is about a
12 forthcoming Businessweek article, correct?

13 A. Give me a moment to look
14 through, just to double-check.

15 (Document review.)

16 A. It looks like it.

17 BY MR. MURA:

18 Q. At the bottom of page 2, do you
19 see where [REDACTED] makes a post titled
20 USDS TnS Update?

21 A. I do.

22 Q. And who is [REDACTED]?

23 A. I believe she was on the USDS
24 side for investigations or risk and response.
25 I'm not sure which. But she helped to do

1 investigations and analysis work.

2 Q. And do you see where the post
3 says: Hey all, we've completed a review
4 of -- and then there's a redaction -- and it
5 says: account which can be found below.

6 Do you see that?

7 A. I do.

8 Q. So this is a Lark chat that
9 postdates a review of an account that was
10 discussed in the Business Weekly [sic]?

11 MR. MATTERN: Objection to
12 form.

13 A. In theory, yes, considering
14 that it's appearing in this chat. I wouldn't
15 be able to confirm one way or another without
16 actually seeing the name and the title.

17 BY MR. MURA:

18 Q. And it goes on: Overall,
19 user -- it's referring to a TikTok user,
20 right, and those are redacted -- was
21 repeatedly shown videos surrounding
22 SSH-related topics, and he likely fell into
23 an SSH filter bubble.

24 Do you see that?

25 A. I do see that.

1 Q. And remind the jury what SSH
2 is?

3 A. Suicide and self-harm.

4 Q. So this would be a suicide,
5 self-harm rabbit hole; is that correct?

6 MR. MATTERN: Objection to
7 form.

8 A. It would be a suicide and
9 self-harm filter bubble.

10 BY MR. MURA:

11 Q. Do rabbit hole and filter
12 bubble mean the same thing, or do you prefer
13 filter bubble?

14 A. They don't always mean the same
15 thing. We set, typically, a more
16 conservative standard for what a filter
17 bubble meant, and we had our own metrics for
18 it versus what folks have generally
19 considered to be a rabbit hole at large.

20 Q. Okay. Can we agree that this
21 chat is indicating that this individual
22 likely fell into a suicide, self-harm filter
23 bubble?

24 A. I think that that's what
25 Rebecca is saying here and reporting back.

1 Q. Do you see back at the top
2 where it says "Hey all" again?

3 If you continue after the
4 "but," it says: we have high confidence in
5 this based off an in-depth review of the
6 content.

7 Do you see that?

8 A. I do see that.

9 Q. And then do you see a little
10 below where it says "Based on a review"? Do
11 you see that language under Videos?

12 A. I do see that.

13 Q. It says: Based on a review of
14 approximately 7,500 videos in the two weeks
15 leading up to the user's death, and it has
16 some dates, nearly 10% violated our community
17 guidelines, mostly for suicide and self-harm.

18 Do you see that?

19 A. I do see that.

20 Q. And you recall that in the
21 previous Lark chat we saw, you indicated that
22 TikTok would not release this user's specific
23 feed log to the media, correct?

24 MR. MATTERN: Objection to
25 form.

1 A. Again, I couldn't confirm
2 whether it was this user or a different one,
3 but we did talk about not releasing a user's
4 feed log to the media who had died recently.

5 BY MR. MURA:

6 Q. And do you recall that the
7 media, specifically Businessweek, did report
8 on this death?

9 A. I don't remember every media
10 report that came out, but presumably so.

11 Q. Let's look at Tab 47, which
12 we're marking as Exhibit 31.

13 (Whereupon,
14 TikTok-Linthicum-31, Bloomberg
15 Article, TikTok's Algorithm Keeps
16 Pushing Suicide to Vulnerable Kids,
17 was marked for identification.)

18 BY MR. MURA:

19 Q. This is an article from
20 Businessweek, correct?

21 A. This is.

22 Q. And the previous Lark chat was
23 entitled Businessweek Feature, and that's the
24 same name of the publication here, correct?

25 A. Yes.

1 BY MR. MURA:

2 Q. Do you know if TikTok ever took
3 any action in response to these reports?

4 MR. MATTERN: Objection to
5 form.

6 A. They predate my time, so no.

7 BY MR. MURA:

8 Q. Let's go to Tab 51. This is
9 going to be TIKTOK3047MDL-078-LARK-01818485,
10 and we'll mark it as Exhibit 35.

11 (Whereupon,
12 TikTok-Linthicum-35, [T&S][INV]
13 Project Argus - US Filter Bubble on
14 SSH/ED Lark Document,
15 TIKTOK3047MDL-078-LARK-01818485 -
16 TIKTOK3047MDL-078-LARK-01818488, was
17 marked for identification.)

18 BY MR. MURA:

19 Q. This document was produced from
20 your files.

21 Any reason to dispute that?

22 A. No reason to dispute.

23 Q. Have you seen this document
24 before?

25 A. I have.

1 Q. And the title is T&S INV
2 Project Argus - US Filter Bubble on SSH/ED.

3 Do you see that?

4 A. I do see that.

5 Q. Can you translate that for us a
6 little bit?

7 A. Trust and safety. INV would be
8 the investigation team. Project Argus was, I
9 guess, the name of the project that they gave
10 themselves. And then filter bubble would
11 have to do with filter bubbles and
12 dispersion, and then SSH/ED would be suicide,
13 self-harm, eating disorders.

14 THE VIDEOGRAPHER: The time is
15 now 5:35, going off the record.

16 (Recess taken, 5:35 p.m. to
17 5:48 p.m. PDT)

18 THE VIDEOGRAPHER: The time is
19 now 5:48. Back on the record.

20 BY MR. MURA:

21 Q. This document says Global
22 Investigations.

23 Do you see that?

24 A. Yes, I do see that.

25 Q. And the date is 7 March 2023.

1 Do you see that?

2 A. I do see that.

3 Q. And under Executive Summary, do
4 you see where it says that Project Argus is:
5 a proactive effort to identify risks before
6 it is made known to users or to the public
7 via news channels, so as to eventually reduce
8 escalations.

9 Is that right?

10 A. I believe so.

11 Q. Okay. And then it goes on to
12 say: This report will focus on the result of
13 test account created for the US market.

14 Do you see that?

15 A. I do see that.

16 Q. And then it says Results, and
17 under that it has a bulleted list of four.

18 Do you see that?

19 A. I do see that.

20 Q. The first one is: Ease of
21 discoverability of SSHDA content in US. And
22 then it says: High.

23 Do you see that?

24 A. I do see that.

25 Q. And then: Ease of entering a

1 filter bubble of SSHDA content in US.

2 Do you see that?

3 A. I do see that.

4 Q. And this document says: High.

5 Do you see that?

6 A. I do see that.

7 Q. Then it says: Density of a
8 filter bubble of SSHDA content in US.

9 Do you see that?

10 A. I do see that.

11 Q. And it says "High" again.
12 Right?

13 A. I do see that.

14 Q. On page 3 in the section on
15 findings, do you see where it says: Filter
16 bubble is fully created.

17 Do you see that?

18 A. Under 3?

19 Q. Yes.

20 A. Yes, I do see that.

21 Q. And it says: by 3:00 p.m.,
22 total searching and liking length, and then
23 it says 1.5 hours?

24 A. I do see that.

25 Q. And then under number 5, do you

1 correct?

2 A. Yes, content that would fall
3 under that bucket presumably.

4 Q. Okay. Let's look at Tab 52,
5 please. This is
6 TIKTOK3047MDL-078-Lark-01835091. This is
7 Exhibit 36.

8 (Whereupon,
9 TikTok-Linthicum-36, North America
10 SSH/ED Planning/Roadmapping Agenda
11 Lark Document,
12 TIKTOK3047MDL-078-LARK-01835091 -
13 TIKTOK3047MDL-078-LARK-01835095, was
14 marked for identification.)

15 BY MR. MURA:

16 Q. I'll represent to you that this
17 came from your files.

18 Any reason to dispute that?

19 A. No reason to dispute it.

20 Q. Have you seen this before?

21 A. I don't know. It's not
22 familiar to me at the moment, but I honestly
23 don't know whether or not I saw it before.

24 Q. And the title is North America
25 SSHED Planning/Roadmapping Agenda.

1 Do you see that?

2 A. I do see that.

3 Q. And do you see at the back page
4 the metadata shows that this document was
5 created on May 4th, 2023?

6 A. I do see that.

7 Q. Okay. If you look above there,
8 you'll see your name.

9 Do you see that?

10 A. Yes, I do see that.

11 Q. Okay. So going back to the
12 pages ending in 094 and 095, at the bottom of
13 094 there's a chart. Do you see that? And
14 it continues onto 095.

15 A. I do see that.

16 Q. And it has columns that appear
17 to be labeled Audience, Suicide or Self-Harm,
18 Negative Affect, Eating Disorders/Extreme
19 Diet and Fitness, and Mental Health.

20 Do you see that?

21 A. Yes, I do see that.

22 Q. And on page ending in 95, so
23 the next page, do you see on the left where
24 it says Violative/NR Content.

25 Do you see that?

1 A. Violative, slash, NR Content,
2 yes.

3 Q. And does that refer to videos
4 that violate TikTok's community guidelines?

5 A. Not necessarily. So it would
6 refer -- I mean, I -- I don't know because
7 this seems like it was put together by the
8 North American team for their off-site.

9 But presumably how I would
10 interpret it and the slang that we used was
11 that this would cover buckets of titles that
12 were covered by our community guidelines, not
13 all of which would result in a violation
14 outcome. Some of them would result in what
15 was called an NR or a not recommend outcome.

16 Q. And do you see under the column
17 Suicide or Self-Harm, for minors, do you see
18 where it says: Filtered by Extreme Risk UPM
19 and General UPM?

20 A. I do see where it says that.

21 Q. Does UPM stand for unapproved
22 prediction model?

23 A. I don't know in the context of
24 this document. That potentially would make
25 sense, but I don't know.

1 Q. Okay. But this document is
2 referring to two algorithms that TikTok uses
3 in the moderation context to identify videos
4 that are predicted to violate TikTok's
5 community guidelines; is that correct?

6 A. Again, I don't know. I would
7 presume so given the context, but not having
8 remembered seeing this document or
9 interacting with it, I just don't know the
10 context for it.

11 Q. And these moderation algorithms
12 are separate and distinct from TikTok's
13 recommendation algorithm; is that correct?

14 MR. MATTERN: Objection to
15 form.

16 A. I don't know how they
17 interweave with it, just because I'm not on
18 the technical algo implementation side, so
19 there are a lot of -- like I think people
20 speak of the algorithm as a monolith or the
21 recommendation algorithm as a monolith, but I
22 think it's actually, to my understanding,
23 like an interwoven of a lot of different
24 layers of algorithms, and so safety
25 algorithms were included as a part of the

1 recommendation stack.

2 BY MR. MURA:

3 Q. So it would be more accurate to
4 say algorithms, plural?

5 A. To my understanding of how it
6 worked. But again, I was not focused on
7 algorithm implementation.

8 Q. And when the document says
9 filtered, that means that TikTok uses
10 algorithms, plural, to try to remove videos
11 from minor users' For You feeds that are
12 predicted to violate TikTok's community
13 guidelines, correct?

14 MR. MATTERN: Objection to form
15 and characterizes document.

16 A. There -- to my understanding, I
17 believe they did.

18 BY MR. MURA:

19 Q. Okay.

20 A. At least on a global level.
21 I'm not sure about the US context, which is
22 what this document would be referring to,
23 because I didn't work on the, like, US/North
24 America team directly.

25 Q. Okay. And those would be

1 moderation algorithms, correct?

2 A. Not necessarily.

3 Q. Okay.

4 A. They would be -- there's, like,
5 multiple types of algorithms, including some
6 that are embedded for safety within the
7 recommendation feed itself that don't
8 necessarily have to do with, like, what gets
9 sent to a moderation queue or not what gets
10 sent to a moderation queue or how those are
11 prioritized, at least to my understanding.

12 Q. Below, do you see where it says
13 Borderline High/Moderate Harm?

14 A. I do see.

15 Q. And do you see the column
16 Negative Affect?

17 A. I do.

18 Q. And there it indicates that
19 TikTok applies dispersion; is that correct?

20 A. Yes, borderline high content
21 was considered to be things that we dispersed
22 through the negative affect dispersion
23 project.

24 Q. And that's a project that you
25 worked on?

1 A. I worked on it in conjunction
2 with [REDACTED] from the US side, because I was on
3 global, so I helped to design the strategy
4 overall and do some of the inclusion and
5 exclusion based on, like consultations --

6 (Clarification requested by the
7 stenographer.)

8 A. -- conversations with external
9 experts as well as, like, reading of general
10 research articles around the topic of
11 negative affect, and so I helped to design
12 the overall negative affect strategy for
13 dispersion.

14 And [REDACTED] was the policy person
15 on the US side for implementation and to sign
16 off for design decisions in that region or
17 the recommendations that we made for the US
18 region.

19 BY MR. MURA:

20 Q. So according to this document,
21 TikTok was dispersing negative affect rabbit
22 holes or filter bubbles, correct?

23 A. According to this document, the
24 strategy that was in place for negative
25 affect borderline content that wasn't covered

1 by CG titles in the US at the time was
2 dispersion outcome.

3 Q. Do you see where it says:
4 Eating Disorders/Extreme Diet and Fitness?

5 A. Yes.

6 Q. And in that column it also says
7 that TikTok applied dispersion.

8 Do you see that?

9 A. I do see that.

10 Q. So the document is indicating
11 that TikTok disperses eating disorder rabbit
12 holes.

13 Do you see that?

14 A. I see, like, Eating Disorders/
15 Extreme Diet and Fitness. "Extreme Diet and
16 Fitness" was the term for the dispersion
17 project used there.

18 Q. Okay. And the document is
19 indicating that TikTok is using dispersion
20 for those types of filter bubbles or rabbit
21 holes, correct?

22 A. Yes. And for the eating
23 disorders one in particular, that would be in
24 addition to moderation that was used for more
25 eating disorder-specific titles as well.

1 Q. Do you see the column for
2 Suicide Or Self-Harm?

3 A. I do.

4 Q. And do you see in that column
5 that it says: No strategy?

6 A. I do.

7 Q. Okay. So this document is
8 indicating that there's not a dispersion
9 strategy for suicide or self-harm rabbit
10 holes or filter bubbles, correct?

11 A. I think not one that is
12 specifically tailored for those topic areas
13 at the time, at least, as represented in this
14 document for the US market, as those were
15 handled by CG titles.

16 Q. We can put that aside.

17 Did TikTok ever tell users that
18 they could fall into harmful rabbit holes or
19 filter bubbles?

20 MR. MATTERN: Objection to
21 form.

22 A. I don't know.

23 BY MR. MURA:

24 Q. Did TikTok ever tell users that
25 they could get stuck in a rabbit hole or

1 filter bubble promoting suicide?

2 A. I don't know.

3 MR. MATTERN: Objection to
4 form.

5 BY MR. MURA:

6 Q. Did TikTok ever tell users that
7 they could get stuck in a rabbit hole or
8 filter bubble promoting self-harm?

9 MR. MATTERN: Objection to
10 form.

11 A. I don't know.

12 BY MR. MURA:

13 Q. Did TikTok ever tell users that
14 they could get stuck in a rabbit hole or
15 filter bubble promoting eating disorders?

16 MR. MATTERN: Objection to
17 form.

18 A. I don't know.

19 BY MR. MURA:

20 Q. Let's bring up Tab 53, please.
21 This is TIKTOK3047MDL-024-LARK-00043559, and
22 we'll mark it as Exhibit 37.

23 (Whereupon,
24 TikTok-Linthicum-37, [T&S] Issue
25 Policy: Feed dispersion for negative

1 name in the corner?

2 A. Yes.

3 Q. Okay. Turn to slide 19,
4 please. The top says Looking Ahead. It's
5 Bates ending in 185.

6 Do you see where it says: Our
7 K-12 school administrators are devoting an
8 average of 10-20 hours per week to some
9 aspect of social media's influence, ranging
10 from the distribution of inappropriate photos
11 and videos to bullying and threats.

12 Do you see that?

13 A. I do see that.

14 Q. Do you have any reason to
15 dispute those figures?

16 A. It's a quote from a school
17 district person, so no.

18 Q. And this quote is from a school
19 district leader in Massachusetts, correct?

20 A. That's what it's attributed to.

21 Q. Let's pull up Tab 55, please.

22 This is TIKTOK3047MDL-055-LARK-00698648.

23 This is Exhibit 39.

24 (Whereupon,

25 TikTok-Linthicum-39, TikTok Now -

1 Community Safety FAQs Lark Document,
2 TIKTOK3047MDL-055-LARK-00698648 -
3 TIKTOK3047MDL-055-LARK-00698651, was
4 marked for identification.)

5 BY MR. MURA:

6 Q. This is a Lark document; is
7 that correct?

8 A. I believe so.

9 Q. And I'll represent to you that
10 it was found in your files.

11 Any reason to dispute that?

12 A. No reason to dispute that.

13 Q. Do you see the title is
14 TikTok Now - Community Safety FAQs?

15 A. I think it's Community Safety
16 F-A-Qs.

17 Q. FAQs, thank you.

18 And do you see under where it
19 says "Key risks"?

20 A. I do see "Key risks."

21 Q. And do you see where it says:
22 Many of the safety features and settings
23 TikTok is known for will not be available for
24 at least the first month after the
25 introduction of TikTok Now.

1 Do you see that?

2 A. I do see it.

3 Q. And then it goes on: As this
4 is a TikTok product, it's difficult to defend
5 this lag given regulatory pressure,
6 competitive pressure with other platforms
7 rolling out more robust family safety
8 controls, and it will highlight a tension
9 between what we say (safety is our priority)
10 and what we do.

11 Do you see that?

12 A. I do see that.

13 I -- sorry. I'm looking
14 through because I don't think I've actually
15 looked at this document before. It mostly
16 concerns minor safety, which is a different
17 vertical for me, so I just wanted to make
18 sure that I hadn't commented on it or there
19 wasn't anything that indicated otherwise.

20 Q. Take your time to look through
21 it.

22 A. Yeah.

23 (Document review.)

24 A. I don't remember this document.

25 ///

1 BY MR. MURA:

2 Q. Do you see where it says:
3 Family Pairing will not be available in the
4 TikTok Now app - the timeline for development
5 is TBD?

6 A. I see where it says it on this
7 paper, yes.

8 Q. To your knowledge, did TikTok
9 ever implement family pairing in the
10 TikTok Now app?

11 MR. MATTERN: Objection to
12 form, characterizes document.

13 A. I don't know. I didn't work on
14 family pairing.

15 BY MR. MURA:

16 Q. So you don't know if it was
17 ever made available in the TikTok Now app?

18 MR. MATTERN: Objection to
19 form, characterizes document.

20 A. Again, I didn't work on family
21 pairing, so I don't know.

22 BY MR. MURA:

23 Q. Do you see where it says:
24 Teens will receive notifications to engage
25 with TikTok Now during school hours?

1 A. I do see that.

2 Q. And teens receiving
3 notifications during school hours is listed
4 here as a key risk, correct?

5 MR. MATTERN: Objection to
6 form, characterizes document.

7 A. Yes.

8 BY MR. MURA:

9 Q. And according to this document,
10 it's a key risk because there's a risk that
11 children will be prompted to use TikTok Now
12 during school, correct?

13 MR. MATTERN: Objection to
14 form.

15 A. I think it was considered a key
16 risk of the launch as in, like -- as --
17 because the -- to my understanding, the minor
18 safety team and the safety and well-being
19 team did not want to have push notifications
20 to kids in school as their focus, you know,
21 is on youth well-being and focus on learning.

22 BY MR. MURA:

23 Q. You said the minor safety team
24 did not want that, but this is documenting
25 that teens will receive notifications to

1 engage with TikTok Now during school hours.

2 Do you see that?

3 MR. MATTERN: Objection to
4 form, characterizes document.

5 A. I do see that written here.

6 BY MR. MURA:

7 Q. TikTok could have restricted
8 TikTok Now from sending notifications to
9 children during school hours, correct?

10 MR. MATTERN: Objection to
11 form.

12 A. I don't know. I don't know the
13 design of the app or the engineering behind
14 it, and so I'm not sure, like, what the
15 constraints were from a technical perspective
16 there.

17 BY MR. MURA:

18 Q. Are you aware of any inability
19 of TikTok to restrict TikTok Now from sending
20 notifications to children during school
21 hours?

22 MR. MATTERN: Objection to
23 form.

24 A. Again, I don't know the
25 technical specifications behind the

1 document -- or behind the design for this, so
2 I wouldn't be able to say one way or another.

3 BY MR. MURA:

4 Q. Let's look at Tab 56. This is
5 TIKTOK3047MDL-042-LARK-00267739, and this is
6 marked as Exhibit 40.

7 (Whereupon,
8 TikTok-Linthicum-40, [P&C] [T&S
9 internal only] Core Group MS - TTN
10 Lark Document,
11 TIKTOK3047MDL-042-LARK-00267739 -
12 TIKTOK3047MDL-042-LARK-00267747, was
13 marked for identification.)

14 BY MR. MURA:

15 Q. This is a Lark chat, correct?

16 A. Yes, it appears to be a Lark
17 chat.

18 Q. And the metadata indicates that
19 it was found in your files.

20 Any reason to dispute that?

21 A. No reason to dispute that.

22 Q. And the title is, again,
23 Privileged and Confidential, Trust & Safety
24 Internal Only.

25 Do you see that?

1 CERTIFICATE

2 I, MICHAEL E. MILLER, Fellow of
3 the Academy of Professional Reporters,
4 Registered Diplomate Reporter, Certified
5 Realtime Reporter, Certified Court Reporter
6 and Notary Public, do hereby certify that
prior to the commencement of the examination,
KATHRYN "RYN" LINTHICUM was duly sworn by me
to testify to the truth, the whole truth and
nothing but the truth.

7 I DO FURTHER CERTIFY that the
8 foregoing is a verbatim transcript of the
9 testimony as taken stenographically by and
before me at the time, place and on the date
hereinbefore set forth, to the best of my
ability.

10 I DO FURTHER CERTIFY that pursuant
11 to FRCP Rule 30, signature of the witness was
12 not requested by the witness or other party
before the conclusion of the deposition.

13 I DO FURTHER CERTIFY that I am
14 neither a relative nor employee nor attorney
15 nor counsel of any of the parties to this
16 action, and that I am neither a relative nor
employee of such attorney or counsel, and
that I am not financially interested in the
action.

17 <%20911,Signature%>

18 MICHAEL E. MILLER, FAPR, RDR, CRR
19 Fellow of the Academy of Professional Reporters
20 NCRA Registered Diplomate Reporter
21 NCRA Certified Realtime Reporter
California CSR #13649

22 Dated: April 21, 2025
23
24
25