

AMENDED Exhibit 636

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

William B. Chandlee

1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT Case No.
ADDICTION/PERSONAL INJURY 4:22-MD-03047-YGR
PRODUCTS LIABILITY LITIGATION

This Document Relates To: MDL No. 3047

ALL ACTIONS

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
UNLIMITED JURISDICTION

Coordination Proceeding Judicial Council
Special Title Coordination Proceeding
(Rule 3.550) No. 5255

SOCIAL MEDIA CASES Judge: Carolyn B. Kuhl
Dept. 12

THIS DOCUMENT RELATES TO:

ALL ACTIONS

CONFIDENTIAL - ATTORNEYS' EYES ONLY
PURSUANT TO PROTECTIVE ORDER

REMOTE VIA ZOOM
VIDEOTAPED DEPOSITION OF
WILLIAM B. CHANDLEE

June 25th, 2025
9:08 a.m.

Reported By:

MAUREEN O. POLLARD, RDR, Notary Public

EXAMINATION

BY MR. MURA:

Q. Good morning, Mr. Chandlee.

A. Good morning.

Q. My name is Andre Mura, and I represent the plaintiffs in this litigation.

Nice to me you.

A. You as well.

Q. Can you see and hear me okay?

A. You just went off camera.

MR. DRAKE: Yeah, your video has gone dead on the witness site here.

THE WITNESS: You were on and just went off.

MR. MURA: Okay. If you don't mind giving us a moment to fix that. I can see myself, so...

THE WITNESS: Must be on our end.

MR. DRAKE: I think it's just the feed into this monitor.

THE VIDEOGRAPHER: The time is 9:09 a.m., and we are off the record.

(Pause.)

THE VIDEOGRAPHER: The time is 9:10 a.m., and we are on the record.

1 just the broader case itself.

2 MR. MURA: Let's pull up the first
3 exhibit which I'm going to introduce. This
4 is Tab 1, which we'll mark as Exhibit 1.

5 (Whereupon, Exhibit Chandlee 1 was
6 marked for identification.)

7 BY MR. MURA:

8 Q. Sir, throughout the day we'll have
9 someone here who will hand you physical copies
10 of the exhibits.

11 A. Okay, great. Is it going to come
12 up on the screen as well, or is it just the
13 physical? Oh, okay, I see.

14 Q. It will also come up on the screen.
15 Let me know if at any point you need more time
16 or you can't view something.

17 Why don't you take a chance to look
18 at this document.

19 MR. DRAKE: Do you happen to have
20 any extra copies real quick?

21 MS. JOZEFczyk: Sorry, none of them
22 with names on them.

23 MR. DRAKE: That's okay. Thank
24 you.

25 (Witness reviewing document.)

1 THE WITNESS: Yep, I'm familiar
2 with the LinkedIn profile.

3 BY MR. MURA:

4 Q. Okay. If you've had a chance to
5 review the document, I'll ask you a few
6 questions, okay?

7 A. Yes.

8 Q. Sir, what is this document?

9 A. This is my LinkedIn profile.

10 Q. According to your LinkedIn profile,
11 before you were at TikTok you were at Facebook
12 for over 12 years. Is that right?

13 A. I was at Facebook for ten years.
14 The way LinkedIn works, there's two years that I
15 was at a company called Outcome Health which was
16 removed from LinkedIn, so they just filled that
17 gap with Facebook. But Facebook was ten years.

18 Q. So you were at Facebook for ten
19 years?

20 A. Yes.

21 Q. And your highest position there was
22 vice president of global partnerships, is that
23 right?

24 A. And I served at a variety of
25 capacities in the business, most of them outside

1 the US as I launched all the businesses outside
2 the US for the company. And then my last --
3 when I moved back to US from Europe, I took on
4 the role of vice president global partnerships,
5 correct.

6 Q. And what did you do in that role?

7 A. Managed the relationship with some
8 of the world's largest advertisers and agencies,
9 as well as different ecosystems partners for the
10 company.

11 Q. Is it fair to say that that
12 describes your role in general when you were at
13 Facebook?

14 A. The beginning, actually the first
15 seven years of Facebook, six or seven years of
16 Facebook, was building the commercial
17 organization in all markets outside the United
18 States, so Europe, Asia Pacific, and Latin
19 America.

20 Q. And before Facebook, according to
21 your LinkedIn, you were vice president in the
22 Yahoo commercial operations department, is that
23 correct?

24 A. Correct.

25 Q. And what did you do in that role?

1 A. So I was at Yahoo for four years.
2 First two years were in the New York office
3 building out some teams that were designed to
4 help the company understand specific vertical
5 markets like retail, consumer packaged goods,
6 things like that.

7 And then the second two years I
8 moved to London to help fix the UK business
9 which was not performing well.

10 Q. So when you say it wasn't
11 performing well, are you saying that Yahoo
12 wasn't selling many advertisements in the UK?

13 A. Correct. It was -- coming from a
14 revenue perspective, it was underperforming.

15 Q. So you were brought in to help grow
16 advertising revenue?

17 A. Correct.

18 Q. And part of your work at Facebook
19 was also to help grow advertising revenue, is
20 that correct?

21 A. Yes, to build -- the Facebook role
22 was to build -- the initial role was to build
23 all the teams in different markets around the
24 world to help drive the advertising business,
25 yes.

1 Q. So is it fair to say that before
2 joining TikTok you worked for about 14 years
3 helping to grow advertising revenues at these
4 two companies, Yahoo and Facebook?

5 MR. DRAKE: Object to form.

6 THE WITNESS: Yes, that's true.

7 BY MR. MURA:

8 Q. And so you joined TikTok in 2019,
9 is that right?

10 A. Correct. April 2019.

11 Q. And your title was president of
12 global business solutions?

13 A. No. At the time I was just running
14 the US and the European business. So I don't
15 remember what the title was, but for the first
16 couple years were just the US and Europe. And
17 then we added in the broader global -- other
18 regions, Asia, Latin America. As we scaled
19 those markets, they fell under my remit as well.

20 Q. So what was your role when you
21 joined TikTok?

22 A. It was very early in the company's
23 development, and so it was helping to initially
24 establish the commercial model for the company
25 in the US and Europe, which is where we have our

1 employee base. That was the initial remit.

2 Q. And how long did you serve in that
3 role?

4 A. Roughly two years in that role.

5 Q. And then what role did you
6 transition to within TikTok?

7 A. Then I transitioned to the
8 president of global business solutions, which
9 included all advertising revenue and teams as
10 well as ads policy, ads moderation, business
11 marketing, ecosystem, so partnerships around the
12 world, pretty much all responsibilities around
13 advertising for the company.

14 Q. Did you have any other
15 responsibilities at TikTok that we haven't
16 discussed?

17 A. Those are the primary
18 responsibilities, yeah.

19 Q. And did you have any other titles
20 while at TikTok that we haven't discussed?

21 A. I don't believe so. I think it
22 was -- no. The early titles were like head of
23 North America and Europe, but since I took on
24 the broader role, this has been the title.

25 Q. So you talked about two roles. In

1 the first role how many people were on your
2 team?

3 A. Well, we were scaling, we were
4 growing very quickly, so we went from a handful
5 of people to -- for the US and European
6 business, I would say it was probably -- I'd say
7 we went from 30 people to maybe 5- or 600 people
8 in the course of that year and a half, let's
9 say, the first year, year and a half.

10 Q. And when you became president of
11 global business solutions, how many people were
12 on your team?

13 A. It went from roughly that 500
14 number up to -- at a peak it was probably 9,000.
15 That's inclusive of all the different functions
16 under the global business solutions remit.

17 Q. So there were 9,000 people on your
18 team. How many direct reports did you have?

19 A. That's varying. At different
20 points in time there were up to 16 direct
21 reports probably.

22 Q. And help me understand, when you
23 say there were about 9,000 people on your team,
24 just broadly speaking what roles were they
25 serving?

1 A. So there were different roles.
2 There were the go-to-market sales teams which
3 were regional sales teams in different markets
4 around the world. That group probably consisted
5 of, I'm going to guess, let's say, 3,000 people.

6 Then we had business marketing
7 which was another couple hundred people.

8 We had what we called marketing
9 science which was, you know, research and
10 analysis.

11 Then we had our ecosystems, so the
12 partnerships we had with third-party providers
13 to help brands and agencies.

14 Then we had the moderation teams,
15 which is the largest group probably. Moderation
16 teams included ads policy and moderation. That
17 was the teams who were making sure the ads that
18 came on the platform were consistent with our
19 policies.

20 And then we had small business --
21 SMB, which is small, medium-sized businesses,
22 which were centralized teams by region, pretty
23 large teams as well.

24 Q. And it says here you are located in
25 New York City. Is that accurate?

1 A. Divide time between New York City
2 and Austin, Texas.

3 Q. In your first role who did you
4 report to?

5 A. I reported to a gentleman named
6 Lidong Zhang.

7 Q. And who is that?

8 A. He was one of the original founders
9 of ByteDance, the parent company.

10 Q. And in your second role as
11 president of global business solutions, who did
12 you report to?

13 A. I continued reporting to Lidong
14 until I transitioned over to Shou, who is the
15 CEO of TikTok.

16 Q. So you reported directly to the
17 CEO?

18 A. Yes.

19 Q. How would you describe the team --
20 the term "global business solutions"?

21 A. I would say it's a team that
22 supports the advertising revenue for the company
23 globally.

24 Q. When you first joined TikTok you
25 were brought in to help ByteDance and TikTok

1 expand internationally beyond the market in
2 China, is that right?

3 A. Correct.

4 Q. And that would include the United
5 States?

6 A. Correct.

7 MR. MURA: Let's bring up Tab 2
8 which we'll mark as Exhibit 2.

9 (Whereupon, Exhibit Chandlee 2 was
10 marked for identification.)

11 (Witness reviewing document.)

12 A. Okay.

13 BY MR. MURA:

14 Q. Sir, this is an article from a
15 publication called The Drum.

16 Do you see that?

17 A. I do.

18 Q. Have you read this article before?

19 A. I'm sure I have. It was a long
20 time ago.

21 The only thing I'd point out is
22 there's a little bit of inaccuracy, but only the
23 reference to Yiming Zhang and Lidong Zhang,
24 they're flipped in terms of their titles, but
25 it's fine.

1 Q. And it's -- the article is from
2 June 18, 2019, is that right?

3 A. That's correct.

4 Q. And the title is, "ByteDance hires
5 former Facebook executive Blake Chandlee to
6 drive Tiktok's global expansion."

7 Do you see that?

8 A. Yes.

9 Q. And then on page 2, do you see
10 where it says, "In a post"? That paragraph?

11 A. Yes.

12 Q. It says, "In a post on Facebook,
13 Chandlee said: 'I have joined ByteDance/TikTok
14 to help Yiming Zhang, Lidong Zhang and the team
15 scale the business outside of the domestic
16 market in China.'"

17 Do you see that?

18 A. Yes.

19 Q. And this is where you were saying
20 the titles were flipped in the article?

21 A. Yeah. Lidong is the senior vice
22 president. Yiming is the founder.

23 Q. Okay. Is the rest accurate?

24 A. Seems that way, yes.

25 Q. Sir, you were at TikTok for over

1 six years, is that right?

2 A. I'm still officially an employee at
3 TikTok.

4 But, yes, six years in that
5 operating role.

6 Q. Your six years -- and your position
7 when you were head of global business solutions
8 was through March 2025, is that right?

9 A. Yes. Correct.

10 Q. And so you stepped down from -- as
11 president of global business solutions in March
12 of 2025.

13 But are you testifying today that
14 you continue to work for TikTok?

15 A. In an advisory capacity as an
16 employee -- a full-time employee in an advisory
17 capacity. So I'm available to leadership as
18 they need me to help with thinking through
19 strategic alignment, operations, so on.

20 Q. And what is your title?

21 A. Advisor to the -- I think it's
22 advisor to the CEO.

23 Q. Is that a full-time position, or
24 just an as-needed position?

25 A. It's officially a full-time

1 position. But the -- it's really more in an ad
2 hoc, as-needed basis.

3 Q. And is it to continue to give
4 advice on the topics of growing advertising
5 revenue?

6 A. Yeah. Advertising, go-to-market
7 strategies, structure, so on.

8 Q. Fair to say it's a continuation of
9 your old job, just a different title?

10 A. No. I don't think it's -- the old
11 job was very much everyday operating. This
12 is -- it's a very different capacity.

13 There's -- we restructured the
14 organization. So my role doesn't exist in the
15 company anymore. So it's actually a very
16 different role.

17 Q. So how is it different?

18 A. I'm not involved in the day-to-day
19 operations or movements of the company. So, you
20 know, decisions being made without my input or
21 guidance, for the most part.

22 Occasionally I'll get a call asking
23 around something around personnel or something.
24 But the day-to-day business is being run by
25 others.

1 Q. And when you say that your
2 department was "restructured," how was it
3 restructured?

4 A. We decided to align around product
5 and go-to-market, which is a pretty natural
6 evolution for big tech companies. And so the --
7 within the monetization teams, there were
8 product teams and there were sales teams,
9 go-to-market teams. GBS was the go-to-market
10 team.

11 GBS and the products and
12 engineering team have been collapsed together
13 within -- within TikTok, and so that created --
14 we didn't need the role of the head of GBS
15 anymore.

16 Q. And what was the reason for
17 collapsing those teams?

18 A. The technology is changing the way
19 sales organizations go to market and clients
20 engage with these big tech platforms. There's
21 much more automation included in the technology
22 now.

23 And so the role of sales teams is
24 evolving, and the value they create is evolving
25 pretty quickly. So the decision we made was to

1 try to bring -- be intentional, bring those two
2 teams even closer together faster. So rather
3 than having them separate organizationally, we
4 brought them together.

5 Q. Is the monetization team now
6 managed by the product team?

7 A. It is, yes.

8 Q. And when did that change occur?

9 A. We announced it when I announced my
10 leaving. The change occurred at the end of Q1.

11 Q. Was there any other organizational
12 changes made at that time?

13 A. Yeah. There was -- there were a
14 number of organization -- I mean, more personnel
15 based versus structural.

16 But, yeah, there have been a number
17 of organizational changes as teams have either
18 come together or, you know, reoriented
19 themselves.

20 Q. Were any other --

21 A. It's a pretty -- a pretty
22 consistent theme for the company over time.

23 I apologize.

24 Q. I apologize, sir.

25 It's a pretty consistent theme for

1 the company to place other teams under the
2 product team?

3 A. I think it's a pretty consistent
4 theme that we like to change organizational
5 structure quickly and often. I think it was
6 part of the -- just the overall culture of the
7 company we wanted to create.

8 We wanted to avoid some of the
9 pitfalls that other tech companies have fallen
10 into, in terms of people becoming kind of
11 lackadaisical or comfortable in roles. So we
12 wanted to constantly be changing. So it was
13 just a part of the ByteDance culture and TikTok
14 culture.

15 Q. And when --

16 A. Sometimes related, sometimes not.

17 Q. When you mentioned Q1 as the time
18 when there was this organizational change,
19 that's a reference to Q1 of 2025?

20 A. Correct. End of March 2025.

21 MR. MURA: Let's pull up Tab 3,
22 which is Exhibit 3.

23 (Whereupon, Exhibit Chandlee 3 was
24 marked for identification.)

25 (Witness reviewing document.)

1 record.

2 THE VIDEOGRAPHER: The time is
3 9:48 a.m. We are off the record.

4 (Whereupon, a recess was taken.)

5 THE VIDEOGRAPHER: The time is
6 9:56 a.m. We are on the record.

7 BY MR. MURA:

8 Q. Sir, I've just handed you what I've
9 marked as Exhibit 4.

10 Why don't you take a chance to look
11 at it. Let me know when you're ready.

12 (Witness reviewing document.)

13 A. Do you want me to read through the
14 whole document?

15 Q. I'm just going to ask you some
16 questions about portions of it. So if you just
17 want to flip through it, and then I can direct
18 you to the portions I might have questions
19 about.

20 A. It's a long document. It's going
21 to take a little while for me to flip through
22 it.

23 Q. Okay. I don't -- I don't have a
24 lot of questions, so --

25 A. Just for reference, would it be

1 easier just to go through the sections you want
2 a viewpoint on?

3 Q. Sure. Why don't I just start to
4 direct you to those portions and then --

5 A. That would be great.

6 Q. -- if you need more time, you can
7 let me know, okay?

8 A. Yes.

9 Q. All right. This is a Lark chat,
10 correct?

11 A. It's referenced. I -- it's not one
12 that I've seen before. But we get a lot of
13 Larks, and so there's some that I just don't
14 read.

15 But, yeah, this...

16 Q. Can you turn to the last page of
17 this document?

18 Do you see where it lists
19 custodians?

20 A. I'm looking at your screen at the
21 same time as -- yes. Yep.

22 Q. Do you see it identifies you as a
23 custodian of this document?

24 A. Yeah.

25 Q. I'll represent to you that this

1 document was produced in this litigation from
2 your files.

3 Any reason to dispute that?

4 A. No.

5 Q. So going back --

6 A. I'm not sure -- can I say I don't
7 know what the definition of custodian in this
8 situation is. But I'm assuming that everything
9 is coming right off the system, so...

10 Q. Let's go back to the first page,
11 sir.

12 A. Yeah.

13 Q. In this Lark chat, do you see it's
14 titled, "Key Coverage"?

15 A. Yes.

16 Q. And the first message is from
17 August 15, 2020?

18 A. Yes.

19 Q. And it appears to be a series of
20 different news articles, is that fair?

21 A. Yes. It's a daily -- it's a daily
22 report that's published and distributed to a
23 list -- a distribution list that's pretty broad.

24 Q. At the bottom of the page ending in
25 62, there's a news article, and it's titled, "UK

1 News."

2 Do you see that?

3 A. Hold on.

4 Yes.

5 MR. MURA: I'll give the
6 videographer a moment to get there. So if
7 you blow up where it says, "UK News." Thank
8 you.

9 Q. Do you see where it says, "TikTok
10 sales saga may play into Facebook's hands"?

11 A. Yes.

12 Q. And if you flip to the next page,
13 do you see it indicates that this article was
14 published by the Financial Times?

15 A. Yes.

16 Q. And it indicates that it was
17 published on August 20, 2020.

18 Do you see that?

19 A. Yes.

20 Q. Okay. So going back to the page
21 ending in 62.

22 A. Yep.

23 Q. So right below where it says,
24 "TikTok sales saga may play into Facebook's
25 hands," do you see where it says, "The battle"

1 --

2 A. I see it.

3 Q. Do you see it? Okay.

4 A. Yep.

5 Q. And let me read it to you. "The
6 battle for TikTok is really about data
7 harvesting. The app's algorithm is worth
8 fighting over. What TikTok has not yet done is
9 translate its popularity into sales. Working
10 out exactly how much the company is worth means
11 working out what the data of its young users is
12 worth to advertisers. This is tricky."

13 Did I read that correctly?

14 A. Yes.

15 Q. Do you agree that at that point in
16 2020, TikTok had not yet translated its
17 popularity into sales?

18 A. I'd have to go back. But, yeah,
19 that was part of the process for the first
20 couple years was, you know, identifying what the
21 revenue strategy for the company would be. That
22 was what we were doing. Following --

23 Q. Fair to say that is one of the
24 reasons they brought you on board from Facebook?

25 A. That was one of the reasons, yes.

1 Q. So as -- when you were at TikTok,
2 you were on the business side of TikTok, is that
3 right?

4 A. Correct.

5 Q. And you testified that one of your
6 responsibilities involved TikTok's advertising
7 revenue?

8 A. Correct.

9 MR. MURA: We can put this document
10 down, sir. We can take it down.

11 Q. Sir, when you joined TikTok, what
12 percentage of TikTok's revenue came from
13 advertising?

14 A. When I joined TikTok what
15 percentage? I would say probably -- I'd be
16 guessing, but I'd say 70 to 80 percent would
17 have been advertising.

18 Q. And did that change during your
19 time, or was that relatively consistent?

20 A. It changed over time. But it still
21 remained roughly 60 percent of the revenue.

22 Q. Did you have a goal for the
23 percentage of revenue that would come from
24 advertising?

25 A. I wouldn't say it was goals. It

1 STATE OF NEW YORK)

2 COUNTY OF ERIE)

3 I, MAUREEN O'CONNOR POLLARD,
4 Registered Diplomate Reporter and Notary Public
5 in and for the State of New York, do certify
6 that on the 25th day of June, 2025, at 9:08
7 o'clock, the person above-named was duly sworn
8 to testify to the truth of their knowledge, and
9 examined, and such examination reduced to
10 typewriting under my direction, and is a true
11 record of the testimony given by the witness. I
12 further certify that I am neither attorney,
13 related or employed by any of the parties to
14 this action, and that I am not a relative or
15 employee of any attorney employed by the parties
16 hereto, or financially interested in the action.

17 In witness whereof, I have hereunto
18 set my hand this 25th day of June, 2025.

19
20
21 <%21527,Signature%>

22 MAUREEN O. POLLARD, Notary Public

23 My Commission Expires: 3/14/27

24 Registered Diplomate Reporter
25