

AMENDED Exhibit 638

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

[REDACTED], Christina Crimmins, Sandeep Grover, [REDACTED]

System Message 2022-08-10 15:29:56

Christina Crimmins invited [REDACTED], **Sandeep Grover** to this chat.

Christina Crimmins 2022-08-10 15:43:11

Hi Sandeep and [REDACTED] - Hope you're both well! Just wanted to send you a quick ping in [REDACTED]'s absence to put something on your radar. The ask: I'd like to request PnP Leadership support/advocacy on the MS recommendation for an 18+ age gate for TikTok Now / RealTok Context: We're in ongoing conversations across TnS and Core Product regarding a new feature called TikTok Now / RealTok, which presents users with a way to snap and share front and back camera shots in real-time. We've got significant concerns from a Minor Safety perspective, both from general safety of users under 18 as well as from a strictly child sexual exploitation / CSAM lens. As a point of significance, the intent is also to make this a standalone app. PnP Issue + Issue Policy shared a joint recommendation for a 18+ age gate, but we're getting strong pushback and are being pressed to find a path forward for the feature+app to be available to 13+. This would break consistency with our stance on real-time visual content generation (LIVE being 18+). Product is looking to move ahead by EOW. Specifics re: next steps: Would either of you be available to be looped in while [REDACTED] is OOO? From PnP, [REDACTED] is in the relevant channel, but is also on leave.

Yes [REDACTED]

System Message 2022-08-10 15:44:21

Sandeep Grover invited [REDACTED] to this chat. New members can see all chat history

Sandeep Grover 2022-08-10 15:44:35

Adding [REDACTED] as well so he can read this later. no need for him to respond now

LOVE Christina Crimmins

Sandeep Grover 2022-08-10 15:46:09

EXHIBIT

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TIKTOK-GROVER 2/27/25

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thanks for the flag Christina. I met with [REDACTED] yesterday and this is being driven by the top leadership and is being done on a very very short timeline. you flag a good risk but they told me that only the people who have mutual followers can see this and its live only for 24 hrs

Sandeep Grover 2022-08-10 15:46:23

what is the age limit for messaging? I think we should align more with messaging vs live?

[REDACTED] 2022-08-10 15:47:13

I am not sure if the growth teams realise just how much we have relied on this from a trust narrative. This has positioned us way above the industry and its removal overall is a huge challenge but being accessed by minors will be a big negative with regulators, ngo's and academia

FINGERHEART Christina Crimmins

JIAVI [REDACTED]

Christina Crimmins 2022-08-10 15:47:56

Such a great point re: messaging! It's 16+. We tried to explore that option as a compromise, but it was shot down. Re: mutual followers - the concern here is grooming. As a predator, once you pick the lock (so to speak), you're opened the door to a network of potential victims.

[REDACTED] 2022-08-10 15:48:04

Are we able to collect more GR and comms signal together with T&S so its not just T&S in the way of growth?

Sandeep Grover 2022-08-10 15:48:36

so will we be ok with 16+ if we align with messaging?

Sandeep Grover 2022-08-10 15:48:56

agree to get more weight from GR/PR

2022-08-10 15:49:10

I know [REDACTED] is on this from GR but is she able to effectively represent the overall concerns?

2022-08-10 15:49:28

Is there regulatory risk here as well?

2022-08-10 15:50:09

@ [REDACTED] We did a round of discussion with GR/PR (including [REDACTED]). The position and feedback was exactly what you articulated above.

Sandeep Grover 2022-08-10 15:50:50

are we ok with 16+?

2022-08-10 15:52:16

@**Sandeep Grover** only if we can get a full and clear strategy in place around monitoring which seems to be lacking. I am still really confused as to where we can and cannot do full DM access scanning and human review

Christina Crimmins 2022-08-10 15:52:24

Re: 16+, we were told it's too complicated from an age assurance perspective... so it's either 13+ or 18+, and the ask is for us to make 13+ work if we can outline mitigations (such as no 2-minute countdown to produce). Re: GR, @ [REDACTED] (and @ [REDACTED] on her team) were looped in and expressed similar concerns. I caught up 1:1 and we're aligned. And strangely, they've *not* been consulted on the significant product change to also go with a standalone app. I've been told it's *highly* confidential so I haven't moved that forward. Re: Comms, I have the question out on whether @ [REDACTED] has been consulted. I haven't seen him tagged in docs, but I may have missed that.

Sandeep Grover 2022-08-10 15:53:21

2022-08-10 15:53:48

Without a clear strategy I am opposed to any major change as it feels like T&S cannot even attempt to address the risks which is both community and brand risk problematic

Sandeep Grover 2022-08-10 15:55:09

do we have a poc written in a doc that I can share with [REDACTED]?

Sandeep Grover 2022-08-10 15:55:13

^pov

Sandeep Grover 2022-08-10 15:55:39

should be framed more in terms of principles, consistency etc.

2022-08-10 15:55:49

@Sandeep Grover it depends on the region but its nowhere near what meta did. Its also really clear to me that the lack of image sharing is a huge barrier to bad actors and a large protection for victims. Yes people can get taken to other platforms but removing the potential for 'in the moment' mistakes is a game chanfge in comparison

Sandeep Grover 2022-08-10 15:56:59

[REDACTED] agreed but we are moving ahead on camera sharing in messaging and ithas been sigend off. of course with many protections in place. Agree with your overall comment though

THUMBSUP [REDACTED]

16+ checks is a def a softspot. Our age assurance is focused on 13+ as highest priority, but it's part of the strategy to button up actual enforcement throughout our age appropriate design framework.

Sandeep Grover 2022-08-10 15:58:00

given teh speed that its moving, we need to internally align if we are ok with 16+ or want to strongly push for 18+ . I will trust your judgement but lets have a quick doc put together.

Christina Crimmins 2022-08-10 15:59:14

Re: whether a doc exists - yes, can share (and another one in progress with mitigations). The caveat on that original recommendaiton doc is that it does *not* incorporate the added risks of a standalone app (because that decision came after, and because it is still highly confidential).

THUMBSUP Sandeep Grover; [REDACTED]

Christina Crimmins 2022-08-10 15:59:37

[REDACTED]

Christina Crimmins 2022-08-10 16:02:33

POST

Title:

Text:

The latest doc that's a WIP is here: [REDACTED]

Highlight from it:

New Feature proposes for evaluation for MS and TnS Leadership team an option based on:

- Lower Age admission requirement, BUT with a stronger risk mitigation strategy based on revision of the functionalities available to U18 if compared to 18+.

We're draft those mitigations here: [REDACTED]

Christina Crimmins 2022-08-10 16:05:00

Really appreciate you all jumping right in - thanks so much for the support. As next steps, @ [REDACTED]
[REDACTED], I'll add you to the Lark group. @Sandeep Grover, would you like to be in it too?

THUMBSUP [REDACTED]

DOCUMENT METADATA

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REDACTIONS:

REDACTION TYPE: