

AMENDED Exhibit 672

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

Andrew Thomas Tomlinson

1

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3
4 IN RE: SOCIAL MEDIA ADOLESCENT Case No. 4:22-MD-03047-YGR
5 ADDICTION/PERSONAL INJURY
6 PRODUCTS LIABILITY LITIGATION MDL No. 3047

7
8 This Document Relates to:
9 ALL ACTIONS

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES
12 UNLIMITED JURISDICTION

13 Coordination Proceeding Judicial Council
14 Special Title (Rule 3.550) Coordination Proceeding
15 No. 5255
16 SOCIAL MEDIA CASES

17
18 THIS DOCUMENT RELATES TO:
19 ALL ACTIONS

20 VOLUME I

21 VIDEOTAPED DEPOSITION OF ANDREW THOMAS TOMLINSON

22 NASHVILLE, TENNESSEE

23 October 1, 2025
24
25

1 Defendants and the Witness.

2 VIDEOGRAPHER: The court reporter is
3 Gina Williams, and will now swear in the
4 witness.

5 - - - -

6 WHEREUPON,

7 ANDREW THOMAS TOMLINSON

8 was called as a witness and, after having been first duly
9 sworn, was deposed and testified as follows:

10 EXAMINATION

11 BY MR. VERRIER:

12 Q Good morning, Mr. Tomlinson.

13 Could you state your full name for the
14 record?

15 A Andrew Thomas Tomlinson.

16 Q My name is Keith Verrier.

17 As you know, there's a litigation going
18 on here with multiple groups of Plaintiffs.

19 I'll be asking questions today, and
20 then a little bit later on I'm going to hand it
21 over to my colleague, Alicia Armstrong, who will
22 ask a few questions as well.

23 Have you ever been deposed before?

24 A No.

25 Q Have you ever testified under

1 record.

2 It's still your obligation to answer
3 the question unless they specifically ask you not
4 to answer the question.

5 Do you understand that?

6 A Yes.

7 Q And I'll try to stop periodically
8 for breaks, maybe once an hour or thereabouts,
9 depending on where the question is.

10 If you need a break at any other time,
11 you just let us know, and we can take a break.

12 The only caveat to that is, if we're in
13 the middle of a line of questioning, we might wait
14 until after the line of questioning is done and
15 then take the break.

16 Do you understand that?

17 A Yes.

18 Q Does that sound good to you?

19 A Sounds great.

20 MR. VERRIER: All right. I'm going

21 to --

22 Tab 1.

23 (Exhibit 1 was marked for identification.)

24 BY MR. VERRIER:

25 Q I'm going to mark as Exhibit 1 --

1 This is, I believe, your resume.

2 Have you seen this document before?

3 A Yes.

4 Q Is it your resume?

5 A Yes.

6 Q And this document indicates that

7 you reside right here in Nashville, Tennessee.

8 Is that right?

9 A Correct.

10 Q And how long have you lived in

11 Nashville?

12 A Just about 15 years.

13 Q And you're still currently living

14 here?

15 A Yeah.

16 Q At the very top under the very

17 first sentence, you refer to yourself as someone

18 who is a "Customer Experience & Operations

19 Leader."

20 Is that right?

21 A Yes.

22 Q And then under "Core

23 Competencies" you describe one of your core

24 competencies as being "Customer Experience,

25 Strategy & Transformation"?

1 Is that right?

2 A Yes.

3 Q And another one is "Operational
4 Excellence & Scalable Process Design"?

5 A Yes.

6 Q And a couple of lines down you
7 also refer to one of your core competencies as
8 "CRM Strategy & Life Cycle Management."

9 Did I read that right?

10 A You did.

11 Q And what is "CRM"?

12 A Customer -- or Client
13 Relationship Management.

14 Q And right after that you list
15 "Technical Systems Integration" as one of your
16 core competencies; is that right?

17 A That's correct.

18 Q And I see you list for platforms
19 of sorts there Zendesk, Salesforce, Jira, Looker
20 and Tableau?

21 Is that right?

22 A That's correct.

23 Q And are those --

24 What are those?

25 A And those are technical systems

1 that are used to either visualize data or provide
2 some sort of support, messaging with a user.

3 Zendesk and Salesforce are the primary
4 ones there of reference for interaction between a
5 user and the company.

6 Q And have you used those
7 at TikTok?

8 A I've used Zendesk at TikTok, but
9 not Salesforce, Jira, Looker or Tableau.

10 Q Okay. If we look under
11 "Professional Experience," your current position
12 is "TikTok User Operations Manager."

13 Is that correct?

14 A That's correct.

15 Q And you've been in that role
16 since June of 2020?

17 A I've been in that role
18 specifically for about two or three years now.

19 Q When you first were hired at
20 TikTok, what was your position at that time?

21 A User Support Lead I believe was
22 the title.

23 Q And you did that for a couple of
24 years?

25 A That's correct.

1 Q Do you know when exactly you
2 moved into the role as User Operations Manager?

3 A I do not know specifically.

4 Q Sometime around 2022, 2023?

5 A That sounds about right.

6 Q And was that a promotion for you?

7 A That's correct. It was a
8 promotion.

9 Q And if you look a couple of
10 bullet points down under your description it says,
11 "Led and developed seven user support leads...
12 across seven diverse work streams."

13 Do you see that?

14 A I do.

15 Q And in this context what are the
16 work streams you're referring to?

17 A The work streams that I'm
18 referencing there are the ones referenced below
19 inside of my resume pertaining to "Executive
20 Escalations, Better Business Bureau, Verification,
21 Manage Creator Support Account Takeover, Younger
22 Users, One Minute+ Support," as well as many --

23 There are a few more as well inside of
24 what I've experienced during my time at TikTok.

25 Q And these are user support work

1 streams at TikTok?

2 A That's correct.

3 Q And if you look at the next
4 bullet point down it says, "Engineered a
5 comprehensive ticketing system."

6 Do you see that?

7 A I do.

8 Q Is that a ticketing system for
9 responding to feedback you get from users of
10 TikTok?

11 A That's correct.

12 Q And below that it says,
13 "Implemented targeted user training programs."

14 Do you see that?

15 A I do.

16 Q And is that training programs for
17 training TikTok's user support staff to respond to
18 feedback they get from clients?

19 A That's correct, new hires and
20 additional trainings that need to happen for our
21 teams.

22 Q So some initial onboarding
23 training, would that be one example?

24 A Yeah, exactly.

25 Q And then additional, as you

1 worked there, updated trainings?

2 A Correct, yeah.

3 Back in 2020 it was kind of all hands
4 on deck with supporting the team so...

5 Q And in 2020 when you were in the
6 support lead role, were you still organizing
7 trainings at that time?

8 A That's correct.

9 Q And then right below the
10 "Implemented targeted user training" bullet
11 there's one that says "Standardized user support
12 processes."

13 Do you see that?

14 A I do.

15 Q And is it your position that
16 improved productivity?

17 A It is my position and what I have
18 been responsible for, when time to update our
19 support processes, to deliver on those things.

20 Q And did it allow you to -- staff
21 to move more quickly through user complaints?

22 A I believe so.

23 MR. VERRIER: You can put that aside.

24 (Exhibit 2 was marked for identification.)
25

1 BY MR. VERRIER:

2 Q I'm going to hand you what's been
3 marked as Exhibit 2.

4 This is a document titled "Notice of
5 Oral and Videotaped Deposition of Defendants
6 TikTok LTD., TikTok LLC, TikTok Inc., ByteDance
7 LTD. and ByteDance Inc. pursuant to Federal Civil
8 Procedure Rule 30(b)(6)."

9 Do you see that?

10 A I do.

11 Q Have you seen this document
12 before?

13 A I have.

14 Q When did you first see it?

15 A I'm not certain on the specific
16 date.

17 Probably a few months ago.

18 Q More than a month ago?

19 A Yes.

20 Q Less than six months ago?

21 A Yes, probably.

22 Q The --

23 If you turn your attention to the
24 bottom of the first page where it lists the
25 Defendants next to 2 where it says, "Defendants

1 TikTok Ltd., TikTok LLC, TikTok Inc. ByteDance
2 Ltd.," on to the next page "ByteDance Inc.," do
3 you see that?

4 A I do.

5 Q And then it says, "Collectively
6 referred to as 'TikTok.'"

7 Do you see that?

8 A I do.

9 Q You understand that when I refer
10 to "TikTok" today, I'm going to be referring to
11 all of these companies listed above collectively.

12 Do you understand that?

13 A I do.

14 Q If at any time you believe
15 there's a distinction that needs to be made,
16 please feel free to bring that up, and then we can
17 deal with it as it comes.

18 A That sounds good.

19 Q Okay. Turning to the next page,
20 page 3, middle of the page it says, "Notice Is
21 Further Given."

22 Do you see that?

23 A Yes.

24 Q And towards the end of that first
25 line it says, "Defendants shall designate" --

1 Do you see where that is right after it
2 says "30(b)(6), Defendants shall designate and
3 produce a representative or representatives, as
4 may be required, to testify on behalf of TikTok
5 concerning the topics identified in Schedule A
6 attached hereto."

7 Do you see that?

8 A I'm sorry. Can you show me
9 where?

10 Q Sure.

11 Do you see where it says, "Notice Is
12 Further Given" in all caps?

13 A Yes.

14 Q Okay. And then if you proceed to
15 the end of that line, the last word of that line
16 is "Defendants."

17 A Yes. Sorry.

18 Q So I'm going to pick up reading
19 from there, okay?

20 A Sorry about that.

21 Q "Defendants shall designate and
22 produce a representative or representatives, as
23 may be required, to testify on behalf of TikTok
24 concerning the topics identified in Schedule A
25 attached hereto."

1 Did I read that correctly?

2 A You did.

3 Q And do you understand that you're
4 the representative that's been designated to
5 testify on behalf of TikTok pursuant to this
6 notice?

7 A I am.

8 Q In other words, you're here to
9 testify in a corporate capacity; right?

10 A That's correct.

11 Q And that is on behalf of TikTok;
12 right?

13 A That's correct.

14 Q And if I could turn your
15 attention to the next page, page 4, do you see
16 where it says "Schedule A" at the top?

17 A I do.

18 Q And these are the deposition
19 topics; is that right?

20 A That's correct.

21 Q When did you first learn that you
22 were going to be designated as a representative on
23 behalf of TikTok for this deposition?

24 A It would have been a few months
25 ago.

1 Q Few months ago.

2 Prior to that time were you aware this
3 litigation existed?

4 A I was not.

5 Q Do you know what this litigation
6 is about?

7 A I understand from the topics that
8 we're discussing today.

9 Q After learning that you would be
10 sitting for deposition in this case, did you do an
11 investigation of your own into the litigation?

12 A No.

13 Q If I could turn your attention to
14 the first topic.

15 So Topic 1 says, "Complaints or other
16 reports from users regarding the failure of the
17 Your age gating and verification system and any
18 discussions of the and Your response to those
19 complaints and reports."

20 Did I read that correctly?

21 A Yeah.

22 Q Have you read this topic before?

23 A Yeah.

24 Q Is that a "yes"?

25 A Yes. Yes. Sorry.

1 Q And this topic addresses
2 complaints and other reports made to TikTok from
3 users related to age gating and age verification;
4 is that right?

5 A Yes.

6 Q And TikTok's response to those
7 complaints and reports; is that right?

8 A That's correct.

9 Q And you're the person designated
10 to testify on behalf of TikTok regarding that
11 topic?

12 A I am.

13 Q In your current capacity as user
14 operations manager or in your prior user support
15 role, did you personally deal with complaints in
16 other reports that users make to TikTok related to
17 age gating and age verification?

18 A We --

19 Sorry.

20 One of the many things that we assisted
21 users on were in regard to this topic, as well as
22 many others, in terms of the process of age gating
23 and questions around that process.

24 Q And that's something you
25 personally were involved in?

1 A My teams -- my support teams
2 were, yes.

3 Q So you had oversight over people
4 who were involved?

5 A Correct.

6 Q As well as some personal
7 involvement?

8 A Yes.

9 Q In your current role --
10 Strike that.

11 In your roles at TikTok took, have you
12 personally been involved with responding to the
13 user complaints?

14 A I have personally responded to
15 feedback before.

16 Q And based solely on what you know
17 from your job at TikTok, are you knowledgeable to
18 testify about this topic?

19 A I am.

20 MR. PARKS: Sorry. Object to form.

21 BY MR. VERRIER:

22 Q Did you take any steps to educate
23 yourself beyond what you already knew in your
24 capacity working at TikTok took so that you could
25 testify about this topic?

1 A No.

2 Q Did you review any additional
3 documents?

4 A No.

5 Q Did you review any data?

6 A No.

7 Q Any reports?

8 A No.

9 Q Did you meet with any individuals
10 to ask them questions that might help you answer
11 some questions here today?

12 A No.

13 Q Were there any sources of
14 information related to age gating or age
15 verification that you're aware of that you did not
16 review in preparation for this deposition?

17 MR. PARKS: Object to form.

18 A Not that I know of personally.

19 BY MR. VERRIER:

20 Q What date range did you consider
21 when preparing to testify about complaints and
22 responses?

23 MR. PARKS: Object to form.

24 A I'm not certain on the date
25 ranges.

1 BY MR. VERRIER:

2 Q You started at TikTok in 2020.

3 Did you consider any information that
4 predated your arrival at TikTok?

5 MR. PARKS: Object to form.

6 A Not to my knowledge.

7 BY MR. VERRIER:

8 Q Did you take any steps to educate
9 yourself on this topic for the period that
10 predated 2020?

11 A No.

12 Q Are you able to testify
13 completely and accurately today about complaints
14 or reports made to TikTok related to failures in
15 the age verification and age gating system, as
16 well as response to those complaints and reports?

17 A Yes.

18 Q Is there anyone at TikTok that
19 you believe has more detailed knowledge about this
20 topic than yourself?

21 MR. PARKS: Object to form.

22 A Yeah, not to my knowledge, but
23 I'm sure there --

24 There are a lot of smart people at
25 TikTok.

1 BY MS. ARMSTRONG:

2 Q All right. Let's turn down to
3 Topic Number 2.

4 Topic 2 says --

5 I'm starting from the beginning.

6 -- "The general types of third-party
7 complaints, if any, made to you directly regarding
8 the use of your platform by students at or during
9 school in the United States and your general types
10 of responses to such complaints."

11 Did I read that correctly?

12 A You did.

13 Q And then it continues, if you
14 look at 2A I should say, it says, "The topic
15 includes but is not limited to the following
16 information."

17 And 2A is "Complaints or concerns that
18 users or third parties, including parents,
19 teachers, school administrators, teachers unions
20 or government bodies raised regarding any harm or
21 impact on schools or students' participation or
22 performance at school or in school, or the
23 classroom or school environment related to the use
24 of your platform and any discussions of the same."

25 Did I read that correctly?

1 A You did.

2 Q If you look at 2B, it also
3 includes "Any response by you to the harm or
4 impact on schools, students' participation or
5 performance at school or in school, or the
6 classroom or school environment reported by users
7 or third parties, including parents, teachers,
8 school administrators, teachers' unions or
9 government bodies and any discussions of the
10 same."

11 Did I read that correctly?

12 A You did.

13 Q Have you read these before?

14 A Yes.

15 Q This topic addresses complaints
16 and concerns with respect to TikTok platform at
17 schools; is that right?

18 A Complaints, yes, understood.

19 Q And TikTok's responses to those
20 complaints and concerns; is that right?

21 A Correct.

22 Q And you're the person designated
23 to testify on behalf of TikTok regarding that
24 topic; correct?

25 A That's correct.

1 Q When were you first designated as
2 the corporate representative for this topic?

3 A I'm not completely sure or not
4 entirely sure on the exact timeline.

5 Q Would it be the same time period
6 as your prior response --

7 A That's correct.

8 Q -- regarding Topic 1?

9 A Correct.

10 Q And if I were to ask you if you
11 did any additional work in preparation for this
12 topic, would your answers be the same as they were
13 for Topic 1?

14 A They would.

15 Q If I could turn your attention to
16 Topic 3, Topic 3 says, "User complaints regarding
17 any adverse effect on minor users on your
18 platform, including the user complaints identified
19 in the user complaints spreadsheets provided by
20 Defendants."

21 Did I read that correctly?

22 A You did.

23 Q Are you knowledgeable to testify
24 about that topic?

25 A Yes.

1 Q Are you aware of the user
2 complaints spreadsheets provided by Defendants in
3 this litigation?

4 A I am.

5 Q I'm referring to "user
6 complaints" here.

7 Do you understand we're referring to
8 information received by TikTok from users, parents
9 or other third parties through one of the user
10 support channels TikTok has established for
11 getting feedback from users.

12 MR. PARKS: Object to form.

13 A I'm aware of the spreadsheets
14 provided and how those could contain complaints,
15 but also just standard feedback regarding any of
16 the topics that were provided to you all.

17 MR. VERRIER: I would like to pull up
18 the first of those spreadsheets, which is
19 Tab 5.

20 (Exhibit 3 was marked for identification.)

21 (Exhibit 3A was marked for identification.)

22 BY MR. VERRIER:

23 Q This is going to be --

24 We're going to mark this as Exhibit 3.
25 It's going to be provided to you on the screen.

1 spreadsheets --

2 A Yes.

3 Q -- you looked at in preparation
4 for this deposition?

5 A Yes.

6 MR. VERRIER: Okay. We're also going
7 to mark as Exhibit 4 what's under Tab 6.
8 This is the second spreadsheet. We're going
9 to do the same process where I'm going to
10 hand you this.

11 (Exhibit 4 was marked for identification.)

12 (Exhibit 4A was marked for identification.)

13 BY MR. VERRIER:

14 Q So I'm handing you what's been
15 marked as 4A. The spreadsheet you see on the
16 screen should be Exhibit 4.

17 What I handed you as Exhibit 4A bears
18 the Bates number on the front
19 TIKTOK3047MDL-290-LARK-08852028.XLSX.

20 Do you see that?

21 A I do.

22 Q And then if you turn to the
23 second page, again there's a metadata sheet.

24 And three-quarters of the way down do
25 you see where it says "File Name"?

1 A I do.

2 Q And do you see that the name here
3 is "userfeedbackdata.xlsx"?

4 A I do.

5 Q And that indicates that it is an
6 Excel spreadsheet; correct?

7 A That's correct.

8 Q Do you want to take a minute to
9 look at this spreadsheet and make sure it's one
10 that you looked at?

11 A I'm very confident in this one.
12 Thank you.

13 Q Okay. So just to be clear for
14 the record, you have seen this spreadsheet prior
15 to your deposition here today?

16 A I have.

17 MR. VERRIER: Now we're going to pull
18 up Tab 7 and mark this as Exhibit 5.

19 And simultaneously I'm going to mark as
20 Exhibit 5A the cover sheet so that you have a
21 hard copy to look at, and this is a cover
22 sheet bears the Bates number
23 TIKTOK3047MDL-290-LARK-08852029.XLSX.

24 (Exhibit 5 was marked for identification.)

25 (Exhibit 5A was marked for identification.)

1 BY MR. VERRIER:

2 Q Do you see that?

3 A I do.

4 Q If you turn to the next page,
5 again three-quarters of the way down, "File Name."
6 Do you see that?

7 A I do.

8 Q And that file name is
9 20250819_usercomplaintfeedbackdata_confidential.XL
10 SX.

11 And that indicates it's an Excel
12 spreadsheet with user data; is that right?

13 MR. PARKS: Object to form.

14 BY MR. VERRIER:

15 Q Well, that indicates an Excel
16 spreadsheet; is that right?

17 A It does, yes.

18 Q And you're looking now at the
19 actual spreadsheet.

20 Is that also an Excel spreadsheet you
21 have seen in preparation for this deposition?

22 A It is.

23 Q Okay. We can put those aside for
24 a second. We'll turn ourselves back to Exhibit 2,
25 the Deposition Notice, and we're going to go back

1 Q Do you understand that you're
2 still under oath?

3 A I do.

4 Q So as my colleague had explained
5 earlier, we have a group of excerpts of the larger
6 spreadsheets that I'm going to present to you, and
7 we're going to proceed in that same manner.
8 They're going to be very similar to the ones that
9 you've already seen.

10 Does that work?

11 A That works.

12 MS. ARMSTRONG: So we're going to pull
13 up Tab 20A. We're going to be referring to
14 Exhibit 4 as the larger spreadsheet and mark
15 this as Exhibit 17A.

16 (Exhibit 17A was marked for identification.)

17 BY MS. ARMSTRONG:

18 Q So I'm handing you an excerpt of
19 the information found in Row 49773.

20 Please take a moment to review the
21 contents of the excerpt. Let me know when you're
22 ready.

23 A Go ahead.

24 Q Do you have any reason to dispute
25 the accuracy of this excerpt?

1 A I do not.

2 Q So the first column reflects the
3 information found in Column D of the larger
4 spreadsheet.

5 Do you see that?

6 A I do.

7 Q Column D represents the date and
8 time that the feedback was received; correct?

9 A Yeah, correct.

10 Q And this user communication to
11 TikTok and ByteDance is from July 5 of 2018;
12 correct?

13 A Correct.

14 Q The next column reflects the
15 information found in Column R.

16 Do you see that?

17 A I do.

18 Q Column R includes the content of
19 that feedback; right?

20 A Correct.

21 Q This user writes, "I have two
22 Musical.ly accounts."

23 Correct?

24 A Correct.

25 Q So this user is reaching out

1 right?

2 A On a router level.

3 Q So that's a yes they reached out
4 asking for help to block TikTok?

5 A From their home network, yes.

6 MS. ARMSTRONG: We're going to pull up
7 Tab 20C.

8 (Exhibit 17C was marked for identification.)

9 BY MS. ARMSTRONG:

10 Q I'm handing you an excerpt from
11 Row 40. Please take a moment to review. We will
12 mark this as Exhibit 17C.

13 A Go ahead.

14 BY MS. ARMSTRONG:

15 Q Any reason to dispute the
16 accuracy of this excerpt?

17 A No.

18 Q This user communication to TikTok
19 and ByteDance is from February 23 of 2019; right?

20 A Correct.

21 Q This user gave the TikTok
22 platform a one star rating.

23 Do you see that?

24 A I see that there's one star
25 highlighted inside of the feedback.

1 Q And it's one star out of five;
2 correct?

3 A Correct.

4 Q They report, "It got me
5 addicted."

6 Right?

7 A "And now I have to delete it" is
8 what the user said, yes.

9 "It got me addicted, and now I have to
10 delete it."

11 MS. ARMSTRONG: Let's underline the
12 word "addicted" in red, please.

13 BY MS. ARMSTRONG:

14 Q And "it" would be TikTok;
15 correct?

16 MR. PARKS: Object to form.

17 A It's not entirely clear.

18 BY MS. ARMSTRONG:

19 Q Do you understand it to be
20 referring to TikTok?

21 MR. PARKS: Objection.

22 A If we could look at the larger
23 sheet, that would be great. Thank you.

24 BY MS. ARMSTRONG:

25 Q And this was out of Exhibit 4.

1 A Am I good?

2 Thank you. Go ahead.

3 Q Do you understand them to be
4 referring to TikTok?

5 A Based off of the way that they're
6 writing, I could read it as that, but it's also
7 not clear by the user of what they're referencing
8 when they say "it."

9 Q Is it reasonable to conclude that
10 they're saying "TikTok got me addicted"?

11 MR. PARKS: Object to form.

12 A No.

13 BY MS. ARMSTRONG:

14 Q "No"?

15 A I don't believe so.

16 Q A moment ago you testified that
17 you could see "it" as referring to TikTok;
18 correct?

19 MR. PARKS: Object to form.

20 A Personally from an app store
21 review perspective, I could understand why "it"
22 would be -- could be in reference to that, but the
23 user themselves does not clearly state "TikTok"
24 specifically in their feedback on the rating.

25

1 BY MS. ARMSTRONG:

2 Q And as you pointed out, the user
3 informs TikTok and ByteDance that they have to
4 delete their account because they are addicted;
5 right?

6 A Inside of the feedback, they
7 reference that they now have to delete the
8 account.

9 Q Because they're addicted, right?

10 A Based on --

11 MR. PARKS: Object to form. Sorry.

12 A Based on the way the feedback is
13 written.

14 BY MS. ARMSTRONG:

15 Q In 2019 TikTok and ByteDance had
16 reports that users were addicted; correct?

17 A There's feedback that contains
18 the word "addicted" inside of it.

19 MS. ARMSTRONG: Let's pull up Tab 20D.

20 (Exhibit 17D was marked for identification.)

21 BY MS. ARMSTRONG:

22 Q This excerpt is from Row 979, and
23 we're going to mark this as 17D.

24 A Okay, I'm ready. Thank you.

25 Q Do you have any reason to dispute

1 referencing the words "addiction" inside of our
2 feedback.

3 BY MS. ARMSTRONG:

4 Q And they were seeking help in
5 2020; correct?

6 A This specific feedback asks for
7 suggestions or for us to do -- or for TikTok to do
8 something.

9 Q Has TikTok or ByteDance ever
10 informed users, parents or the public that in 2020
11 users reported developing an addiction to TikTok?

12 MR. PARKS: Object to form.

13 A I'm not sure.

14 MS. ARMSTRONG: Let's pull up Tab 20F,
15 which we'll mark as 17F.

16 (Exhibit 17F was marked for identification.)

17 BY MS. ARMSTRONG:

18 Q This is an excerpt from Row
19 14776.

20 A I see that.

21 Q Do you have any reason to dispute
22 the accuracy of this excerpt?

23 A I don't.

24 Q This user communication to TikTok
25 and ByteDance is from September 15 of 2020; right?

1 A Correct.

2 Q The user reports, "I think I'm
3 addicted TikTok."

4 Do you see that?

5 A I see that.

6 MS. ARMSTRONG: Let's underline the
7 word "addicted," please.

8 BY MS. ARMSTRONG:

9 Q In 2020 TikTok and ByteDance had
10 reports that users were addicted; correct?

11 MR. PARKS: Object to form.

12 A There was feedback that contained
13 the word "addicted," and this user specifically
14 said, "I think I'm addicted TikTok."

15 BY MS. ARMSTRONG:

16 Q Has TikTok or ByteDance ever
17 informed users, parents or the public that in 2020
18 users reported having --

19 Strike that.

20 Has TikTok or ByteDance ever informed
21 users, parents or the public that in 2020 users
22 reported being addicted?

23 MR. PARKS: Object to form.

24 A I'm not sure.

25

1 BY MS. ARMSTRONG:

2 Q The user then explains, "After
3 watching the movie Social Dilemma about social
4 media, I've come to the decision to delete my
5 account."

6 Did I read that correctly?

7 A You did.

8 Q Are you familiar with The Social
9 Dilemma?

10 A I'm not.

11 Q We're going to pull up Tab 31,
12 which is a video, so I don't have anything hard
13 copy for you, and we're going to watch a trailer
14 for The Social Dilemma together, and then I'll
15 have some follow-up questions afterwards.

16 Sound good?

17 A Okay.

18 (Video of movie trailer for "The Social
19 Dilemma" was played.)

20 MS. ARMSTRONG: We're going to mark
21 this as Exhibit 18.

22 (Exhibit 18 was marked for identification.)

23 MR. PARKS: I'll just object to the
24 lack of foundation.

25

1 BY MS. ARMSTRONG:

2 Q Let's return to the specific
3 complaint here.

4 The user reports that because of
5 watching The Social Dilemma they need to delete
6 their TikTok account; right?

7 MR. PARKS: Object to form.

8 A They reach out and they say
9 they've come to a decision to delete their
10 account.

11 BY MS. ARMSTRONG:

12 Q After watching the movie Social
13 Dilemma; right?

14 A Inside of their feedback, that's
15 the movie they reference.

16 Q Has TikTok or ByteDance ever
17 informed users, parents or the public that after
18 watching The Social Dilemma users were compelled
19 to delete their TikTok account?

20 MR. PARKS: Objection, outside the
21 scope, lacks foundation. Object to the form.
22 Go ahead.

23 A I'm not sure.

24 MS. ARMSTRONG: Let's pull up Tab 20G,
25 which we'll mark as 17G.

(Exhibit 17G was marked for identification.)

BY MS. ARMSTRONG:

Q This is an excerpt from Row
26800.

A Okay.

Q Do you have any reason to dispute
the accuracy of this excerpt?

A I do not.

Q This user communication to TikTok
and ByteDance is from March 7 of 2021; correct?

A Correct.

Q At the bottom of the first
paragraph, the user tells TikTok and ByteDance
that they are "trying to get over my TikTok
addiction. Please delete."

Do you see that?

A I do see that feedback.

MS. ARMSTRONG: Let's underline the
word "addiction."

BY MS. ARMSTRONG:

Q So this user is trying to recover
from their TikTok addiction; right?

MR. PARKS: Object to form.

A They're requesting to delete
their account.

1 A I have not personally seen it.

2 BY MS. ARMSTRONG:

3 Q Are you aware of any?

4 MR. PARKS: Same objections, asked and
5 answered.

6 A I'm not.

7 MS. ARMSTRONG: How long have we been
8 on the record since the last break?

9 MR. PARKS: About 50 minutes, I think.

10 MS. ARMSTRONG: Is now a good time for
11 a break?

12 THE WITNESS: Yeah, that's fine.

13 VIDEOGRAPHER: Stand by. End of Media
14 File 5. Off the record at 1:53.

15 (Recess was taken.)

16 VIDEOGRAPHER: Beginning of Media
17 File 6. We're back on the record at 2:05.

18 MS. ARMSTRONG: We are going to pull up
19 Tab 21A, which we're going to mark as 19A.

20 (Exhibit 19A was marked for identification.)

21 BY MS. ARMSTRONG:

22 Q This is going to be out of
23 Exhibit 4 ending in _2028, and this is an excerpt
24 from Row 783.

25 A Okay, thank you.

1 Q Do you have any reason to dispute
2 the accuracy of this excerpt?

3 A I do not.

4 Q This user communication to TikTok
5 and ByteDance is from December 4 of 2018; correct?

6 MR. PARKS: Object to form.

7 A That looks correct.

8 BY MS. ARMSTRONG:

9 Q And this report is from the
10 parent of an 11-year-old; right?

11 A That is the way that it's
12 positioned inside of the feedback.

13 Q The 11-year-old has a TikTok
14 account; correct?

15 A The user references that the user
16 is 11 years old.

17 Q So that's, yes, that they have a
18 TikTok account?

19 A The account that they're
20 referencing says that there's a user name involved
21 that would, according to the feedback, is their
22 daughter's.

23 Q TikTok's minimum age requirement
24 is 13; correct?

25 MR. PARKS: Objection, asked and

1 A That's what they're saying based
2 on their feedback.

3 MS. ARMSTRONG: Let's underline "11
4 years old" in the second sentence, please.

5 And we're going to pull up Tab 21B,
6 which we will mark as Exhibit 19B.

7 (Exhibit 19B was marked for identification.)

8 BY MS. ARMSTRONG:

9 Q And this is an excerpt from Row
10 4612.

11 A Okay, thank you.

12 Q Do you have any reason to dispute
13 the accuracy of this excerpt?

14 A I do not.

15 Q This user communication to TikTok
16 and ByteDance is from March 19 of 2020; correct?

17 A Yes.

18 Q And this is another message from
19 a parent; right?

20 A The way that it's being written,
21 yes.

22 Q This parent is reaching out about
23 their 10-year-old's TikTok account; right?

24 A Correct.

25 Q The parent informs TikTok and

1 ByteDance that the 10-year-old is not allowed on
2 social media; right?

3 A Based on the feedback provided.

4 Q This parent wants their
5 10-year-old's account deleted; correct?

6 A That is what they're requesting.

7 Q Then they flag another underage
8 user, their child's friend; right?

9 A Inside of the feedback, that's
10 what's referenced, yes.

11 Q The parent tells TikTok and
12 ByteDance that both children are in the fifth
13 grade.

14 Do you see that?

15 A I do see that.

16 Q In 2020 TikTok and ByteDance had
17 reports of underaged children accessing the
18 platform; right?

19 MR. PARKS: Object to form.

20 A Based on the feedback provided.

21 MS. ARMSTRONG: Let's underline "10
22 years old," please.

23 We're going to then pull up Tab 21C,
24 which is taken from Exhibit 3.

25 (Exhibit 19C was marked for identification.)

1 right?

2 A TikTok would help in that.

3 Q And at the bottom of the message
4 there's a note left by a TikTok employee; correct?

5 A I believe so.

6 Q The employee's note says "NRN,"
7 right?

8 A Correct.

9 Q Do you understand "NRN" to be no
10 response necessary?

11 A No response needed.

12 Q Excuse me.
13 The note "NRN" means no response
14 needed?

15 A Correct.

16 MS. ARMSTRONG: All right. Let's pull
17 up --

18 Excuse me.

19 Before we do that --

20 We are --

21 Let's pull up Tab 21D marked as Exhibit
22 19D.

23 (Exhibit 19D was marked for identification.)

24 BY MS. ARMSTRONG:

25 Q This is an excerpt from Row

1 20517.

2 MR. PARKS: Is there a question
3 pending? Sorry.

4 MS. ARMSTRONG: No, sorry. We're just
5 reviewing.

6 A Okay.

7 BY MS. ARMSTRONG:

8 Q Do you have any reason to dispute
9 the accuracy of this excerpt?

10 A No. It looks like it came
11 through and has referenced the line appropriately.

12 Q This user communication to TikTok
13 and ByteDance is from September 30 of 2021;
14 correct?

15 A Correct.

16 Q This is from the parent of an
17 11-year-old; correct?

18 A This actually looks to be from
19 "Pissedconsumer.com" or from a team maybe that
20 forwarded some information over in regard to a
21 submission.

22 Q In the third line about halfway
23 through where it says "Message Body," are you with
24 me?

25 A I am with you. Yeah, thank you.

1 Q It says, "I have an 11-year-old
2 daughter."

3 Do you see that?

4 A I do.

5 Q So this message is in reference
6 to a parent discussing their 11-year-old daughter;
7 right?

8 MR. PARKS: Object to form.

9 A Based on the feedback that
10 they've provided to what looks like a third party,
11 "Pissedconsumer.com."

12 MS. ARMSTRONG: Can we underline
13 "11-year-old," please.

14 BY MS. ARMSTRONG:

15 Q They write, "I do not know why
16 you guys would allow young children on your site
17 without further identification verification."

18 Do you see that?

19 A I do see that.

20 Q And then they demand that their
21 child's accounts gets deleted immediately; right?

22 A Thank you.

23 I do see that.

24 Thank you.

25 Q In 2021 TikTok and ByteDance had

1 BY MS. ARMSTRONG:

2 Q So let's turn back to this
3 complaint.

4 This parent says they only learned
5 their child had a TikTok account because they were
6 sent screenshots from other parents; right?

7 Sorry. That's about halfway in the
8 middle.

9 A I got there. Thank you.
10 I do see the feedback that is
11 referenced saying they have screenshots of
12 different parents sending them pictures.

13 Q Then when this parent went to
14 report the account, they learned that their child
15 had blocked them; right?

16 A She references that "I am
17 blocked" or they reference "I am blocked so I
18 cannot report the page."

19 Q In 2021 TikTok and ByteDance had
20 reports that children were blocking their parents'
21 account; right?

22 MR. PARKS: Object to form.

23 A Based on the feedback that's
24 written.

25 MS. ARMSTRONG: We're going to pull up

1 Tab 21E, which we'll mark as 19E.

2 And this is going to be out of
3 Exhibit 5 spreadsheet ending in _2029.

4 (Exhibit 19E was marked for identification.)

5 BY MS. ARMSTRONG:

6 Q Here you go. This is an excerpt
7 from Row 22267.

8 A Okay.

9 Q Do you have any reason to dispute
10 the accuracy of this excerpt?

11 A No.

12 Q This user communication to TikTok
13 and ByteDance is from June 28 of 2022; correct?

14 A Correct.

15 Q It is a submission from the
16 parent of an 11-year-old; right?

17 A The feedback states that their
18 daughter is 11.

19 MS. ARMSTRONG: Let's underline "11,"
20 please.

21 BY MS. ARMSTRONG:

22 Q The parent informs TikTok and
23 ByteDance that their 11-year-old daughter snuck
24 onto TikTok; correct?

25 MR. PARKS: Object to form.

1 A In the first sentence, that's
2 what they reference, "snuck and created" the
3 account.

4 BY MS. ARMSTRONG:

5 Q And the parent asks TikTok how to
6 switch the 11-year-old's regular account to a
7 kid's account; correct?

8 A Based on the feedback provided.

9 Q In 2022 TikTok and ByteDance had
10 reports of underaged children accessing the TikTok
11 platform; right?

12 MR. PARKS: Object to form.

13 A Based on the feedback provided.

14 MS. ARMSTRONG: We're going to pull up
15 Tab 21F, which we'll mark as Exhibit 19F.

16 (Exhibit 19F was marked for identification.)

17 BY MS. ARMSTRONG:

18 Q This is an excerpt from Row
19 107742.

20 A Okay.

21 Q Do you have any reason to dispute
22 the accuracy of this excerpt?

23 A I do not.

24 Q This user communication to TikTok
25 and ByteDance is from November 21 of 2023;

1 correct?

2 A That's correct.

3 Q It is another submission from the
4 parent of an 11-year-old; correct?

5 A Based on the feedback provided.

6 MS. ARMSTRONG: Let's underline

7 "11-year-old child," please.

8 BY MS. ARMSTRONG:

9 Q This 11-year-old also has a
10 TikTok account; right?

11 A That's what the feedback is
12 referencing, yeah.

13 It doesn't state specifically if the
14 person that's reaching out is the --

15 Yeah, the feedback here kind of makes
16 it sound like this is a shared account potentially
17 between a parent and an 11-year-old based on the
18 user saying "This is my 11-year-old child's
19 account."

20 They don't like specifically reference
21 a handle is all I'm kind of referencing here, but
22 continue.

23 Q Just to clarify, they write "This
24 is my 11-year-old child's account."

25 Correct?

1 A Correct.

2 Q In 2023 TikTok and ByteDance had
3 reports of underaged children accessing the
4 platform; right?

5 MR. PARKS: Object to the form.

6 A Based on this feedback.

7 BY MS. ARMSTRONG:

8 Q Now this parent is also reporting
9 an account; correct?

10 A They reference reporting a
11 scammer.

12 Q They were reporting a pedophile;
13 correct?

14 A Based on the feedback provided,
15 they reference that.

16 Q The pedophile had messaged the
17 11-year-old on the TikTok platform; correct?

18 MR. PARKS: Object to form.

19 A Based on the feedback provided
20 here.

21 BY MS. ARMSTRONG:

22 Q The pedophile was trying to lead
23 the 11-year-old off the platform and meet up with
24 them in person; correct?

25 MR. PARKS: Object to form.

1 MR. PARKS: Same objection.

2 A I'm not aware of any.

3 MS. ARMSTRONG: Do you need a break?

4 THE WITNESS: I can keep going if
5 you're okay with that.

6 MS. ARMSTRONG: We are going to pull up
7 Tab 23A, which will be Exhibit 23A.

8 We're going to take this from Exhibit 4
9 Bates ending _2028.

10 (Exhibit 23A was marked for identification.)

11 BY MS. ARMSTRONG:

12 Q This is an excerpt from Row 2862.

13 A Okay.

14 Q Do you have any reason to dispute
15 the accuracy of this excerpt?

16 A I do not.

17 Q This user communication to TikTok
18 and ByteDance is from December 9 of 2029 (sic);
19 correct?

20 A 2019.

21 Q What did I say?

22 A 2029.

23 Q That would be a problem. Let me
24 reask the question.

25 A Okay. You're okay.

1 Q This user communication to TikTok
2 and ByteDance is from December 9 of 2019; correct?

3 A Correct.

4 Q The submission is discussing
5 TikTok's beauty filters; right?

6 MR. PARKS: Object to form.

7 A It's referencing filters.

8 I'm not sure if they're beauty filters
9 specifically, but filters on the app is what I
10 understand.

11 BY MS. ARMSTRONG:

12 Q Filters are tools within the
13 TikTok platform that allow users to alter their
14 pictures and videos; right?

15 A Yes.

16 Q And these filters are created and
17 provided by TikTok for the use on the TikTok
18 platform; right?

19 MR. PARKS: Object to form, outside the
20 scope.

21 A I'm not aware of the specifics on
22 those.

23 BY MS. ARMSTRONG:

24 Q This user complaint is from the
25 parent of a teenager; right?

1 A Based on the feedback provided,
2 yeah.

3 Q The parent writes --
4 Strike that.

5 The parent tells TikTok and ByteDance
6 that their filters "glamorize suicide and self
7 harm."

8 Correct?

9 MR. PARKS: Object to form.

10 A Based on the feedback that
11 they've provided here.

12 BY MS. ARMSTRONG:

13 Q The parent writes, "When
14 thousands if not millions of teens and pre-teens
15 use your app, I am baffled these are even allowed
16 in the first place."

17 Do you see that?

18 A I do.

19 Q And then the parent demands that
20 TikTok and ByteDance remove these filters; right?

21 MR. PARKS: Object to form.

22 A They do share that they should be
23 removed.

24 BY MS. ARMSTRONG:

25 Q So in 2019 TikTok and ByteDance

1 Sorry about that.

2 MS. ARMSTRONG: Tab 23B, please, which
3 we are going to mark as 23B.

4 (Exhibit 23B was marked for identification.)

5 BY MS. ARMSTRONG:

6 Q This is an excerpt from Row
7 33865.

8 A Okay.

9 Q This user communication is from
10 June 2 of 2021; correct?

11 A Correct.

12 Q This message is a follow-up to a
13 previously made complaint.

14 Do you see that?

15 A I do see that.

16 Q Meaning this user has previously
17 contacted TikTok and ByteDance about this same
18 issue; correct?

19 MR. PARKS: Object to form.

20 A Based on the feedback that we're
21 looking at here from Row 33865.

22 BY MS. ARMSTRONG:

23 Q The issue being discussed is
24 automatic filters; right?

25 A That's what they reference in the

1 feedback, yeah.

2 Q Automatic filters get applied as
3 soon as the user opens the camera; correct?

4 MR. PARKS: Object to form, outside the
5 scope.

6 A Based on what these are sharing
7 with us, they're sharing that that's what happens
8 to them, yes.

9 BY MS. ARMSTRONG:

10 Q Do you have knowledge, as a
11 TikTok employee, that automatic filters work in
12 this way?

13 MR. PARKS: Object to the form, outside
14 the scope.

15 A I'm not.

16 BY MS. ARMSTRONG:

17 Q With this submission the user
18 attached two screenshots; correct?

19 A They reference that they have,
20 yes.

21 Q The user explains to TikTok and
22 ByteDance that the first screenshot depicts what
23 the user naturally looks like; right?

24 A Based on the feedback that they
25 provided to us.

1 Q The second screenshot depicts
2 their appearance with the automatic filter turned
3 on; correct?

4 A Yes, based on -- based on the
5 feedback provided.

6 Q The user explains that the second
7 screenshot was taken "mere seconds" after the
8 camera was opened; right?

9 A Based on the feedback, yeah.

10 Q The automatic filter smoothed out
11 their pimples and skin texture; right?

12 A Based on their feedback.

13 Q And the user clarifies that they
14 did not apply the filter themselves; correct?

15 A Correct.

16 Q Instead, the app applied the
17 filter as soon as they opened the camera; correct?

18 A Based on their feedback.

19 Q The user tells TikTok and
20 ByteDance that applying a filter without a
21 person's permission is a "major issue."

22 Right?

23 MR. PARKS: Object to form.

24 A Based on their feedback here,
25 what they shared with us.

1 BY MS. ARMSTRONG:

2 Q It is a major issue because it
3 "could trigger people's mental illnesses, body
4 dysmorphia or dysphoria."

5 Correct?

6 A Based on the feedback that
7 they've shared.

8 Q The user then flags that "most
9 users on TikTok are children, teens and young
10 adults."

11 Right?

12 A Based on their feedback.

13 Q And the user informs TikTok and
14 ByteDance that these automatic filters are
15 "teaching these vulnerable and still-developing
16 age groups that they need a beauty filter to feel
17 beautiful and accepted."

18 Do you see that?

19 MR. PARKS: Object to form.

20 A I see -- I see the feedback.

21 BY MS. ARMSTRONG:

22 Q The user describes this lesson as
23 "very harmful."

24 Correct?

25 A Based on their feedback provided

1 here.

2 Q And they ask TikTok and ByteDance
3 to remove the filters; right?

4 A Yes.

5 Q They write, "This shouldn't have
6 to be said, but please take the filter off. It
7 makes TikTok users extremely uncomfortable."

8 Do you see that?

9 A I do.

10 Q So in 2021 TikTok and ByteDance
11 had reports that its automatic filters could
12 trigger mental illnesses; right?

13 MR. PARKS: Object to the form.

14 A Based on this feedback.

15 BY MS. ARMSTRONG:

16 Q Has TikTok or ByteDance ever
17 informed users, parents or the public that in 2021
18 users reported TikTok's automatic filters
19 triggering mental illnesses?

20 MR. PARKS: Object to the form, outside
21 the scope.

22 A I'm not aware of any.

23 BY MS. ARMSTRONG:

24 Q In 2021 TikTok and ByteDance had
25 reports that its automatic filters could trigger

1 BY MS. ARMSTRONG:

2 Q I can.

3 Has TikTok or ByteDance ever informed
4 users, parents or the public that in 2021 users
5 reported that TikTok's automatic filters could
6 trigger body dysphoria?

7 MR. PARKS: Same objection.

8 A I'm not aware of any.

9 MS. ARMSTRONG: We're going to pull up
10 Tab 23C and mark it as 23C.

11 This is now being pulled from
12 Exhibit 5, Bates ending _2029, and this is an
13 excerpt from Row 643.

14 (Exhibit 23C was marked for identification.)

15 A Okay.

16 BY MS. ARMSTRONG:

17 Q Do you have any reason to dispute
18 the accuracy of this excerpt?

19 A I don't.

20 Q This user communication to TikTok
21 and ByteDance is from January 31 of 2022; correct?

22 A Correct.

23 Q This user is reporting to TikTok
24 and ByteDance that they cannot tell when a filter
25 is being used on a video; correct?

1 A Correct, based on the feedback.

2 Q They write, "I just spent at
3 least an hour trying to find how you can see what
4 effect is on what video, and everything came up
5 short."

6 Do you see that?

7 A I do see that.

8 Q The user explains that there are
9 no indicators when filters are applied to videos;
10 correct?

11 MR. PARKS: Object to the form.

12 A Based on the feedback provided.

13 BY MS. ARMSTRONG:

14 Q And they indicate that there are
15 a lot of other people experiencing the same
16 problem; right?

17 A Based on the feedback that
18 they've provided.

19 Q The user describes this as
20 "brutal."

21 Correct?

22 A Based on the feedback provided.

23 Q The user tells TikTok and
24 ByteDance that "This is brutal for PPL."

25 Do you understand "PPL" as being

1 people?

2 A I do.

3 Q So they're saying, "This is
4 brutal for people who have body dysmorphia."

5 Correct?

6 A Based on the feedback.

7 Q So this user is informing TikTok
8 and ByteDance that undisclosed filter use is
9 brutal to people with body dysmorphia; right?

10 MR. PARKS: Object to form.

11 A Based on the feedback that
12 they've provided here.

13 BY MS. ARMSTRONG:

14 Q In fact, it is "extremely
15 problematic to not show that" a filter is being
16 used.

17 Correct?

18 A Based on the feedback provided
19 here.

20 Q And they ask TikTok and ByteDance
21 to "Please help."

22 Right?

23 MR. PARKS: Object to form.

24 A Based on the feedback.

25

1 BY MS. ARMSTRONG:

2 Q The user is asking TikTok and
3 ByteDance to add an indicator showing when a
4 filter is applied; right?

5 MR. PARKS: Object to form.

6 A Could you ask the question again?

7 BY MS. ARMSTRONG:

8 Q The user is asking TikTok and
9 ByteDance to add an indicator showing when a
10 filter is applied; right?

11 MR. PARKS: Object to form.

12 A Based on the feedback, they're
13 sharing that they find it annoying that they can't
14 see what filter or effect is being used.

15 BY MS. ARMSTRONG:

16 Q Just to clarify, they're not just
17 saying it's annoying.

18 They're saying that it's extremely
19 problematic; right?

20 A To show what filter is being
21 used.

22 Q So in 2022 TikTok and ByteDance
23 has reports that undisclosed filter use harms
24 people with body dysmorphia; right?

25 MR. PARKS: Object to the form.

1 MS. ARMSTRONG: We're going to pull up
2 Tab 23D and mark that as Exhibit 23D.

3 (Exhibit 23D was marked for identification.)

4 BY SPEAKER 1:

5 Q This is an excerpt from Row
6 65877.

7 A Okay.

8 Q Do you have any reason to dispute
9 the accuracy of this excerpt?

10 A I don't.

11 Q This user communication to TikTok
12 and ByteDance is from January 5 of 2023; correct?

13 A Correct.

14 Q And the user is discussing a
15 filter that is applied to a user's nose; right?

16 A Based on the feedback that
17 they've provided.

18 Q The user alerts TikTok and
19 ByteDance that "This filter could possibly lead to
20 body dysmorphia/self-esteem issues."

21 Right?

22 MR. PARKS: Object to form.

23 A Based on the feedback that
24 they've provided here.

25

1 BY MS. ARMSTRONG:

2 Q The user also tells TikTok and
3 ByteDance that "It promotes the idea that your
4 nose is something you can change/should change."

5 Correct?

6 MR. PARKS: Object to form.

7 A Based on the feedback here.

8 BY MS. ARMSTRONG:

9 Q And they emphasize "That's
10 completely wrong."

11 Right?

12 A They do share that in the
13 feedback.

14 Q The user says the existence of
15 this filter on the TikTok platform is
16 "disgusting."

17 Right?

18 A Based on the feedback provided.

19 Q It is disgusting because it is
20 "feeding off people who struggle with self-image
21 issues."

22 Right?

23 MR. PARKS: Object to form.

24 A Based on the feedback provided
25 here.

1 BY MS. ARMSTRONG:

2 Q And the user demands that TikTok
3 and ByteDance remove the filter from the TikTok
4 platform; right?

5 MR. PARKS: Object to form.

6 A Based on the feedback provided
7 here.

8 BY MS. ARMSTRONG:

9 Q So in 2023 TikTok and ByteDance
10 had reports that its filters can lead to body
11 dysmorphia; right?

12 MR. PARKS: Object to the form.

13 A Based on the feedback here.

14 BY MS. ARMSTRONG:

15 Q Has TikTok or ByteDance ever
16 informed users, parents or the public that in 2023
17 users reported TikTok's filters could lead to body
18 dysmorphia?

19 MR. PARKS: Object to form, outside the
20 scope.

21 A I'm not aware of any.

22 BY MS. ARMSTRONG:

23 Q In 2023 TikTok and ByteDance had
24 reports that its filters can lead to self-esteem
25 issues; right?

1 MR. PARKS: Object to form.

2 A Based on the feedback provided
3 here.

4 BY MS. ARMSTRONG:

5 Q Has TikTok or ByteDance ever
6 informed users, parents or the public that in 2023
7 users reported TikTok's filters could lead to
8 self-esteem issues?

9 MR. PARKS: Object to the form, outside
10 the scope.

11 A I'm not aware of any.

12 MS. ARMSTRONG: We're going to pull up
13 Tab 23E, which we're going to mark as 23E.

14 (Exhibit 23E was marked for identification.)

15 BY MS. ARMSTRONG:

16 Q This is an excerpt from Row
17 103654.

18 Do you have any reason to dispute the
19 accuracy of this excerpt?

20 A I don't.

21 Q This user communication to TikTok
22 and ByteDance is from October 8 of 2023; correct?

23 A Correct.

24 Q This user is discussing the
25 dangers of the skinny filter; right?

1 MR. PARKS: Object to the form.

2 A Based on their feedback provided,
3 they reference the skinny -- quote/unquote, skinny
4 filter.

5 BY MS. ARMSTRONG:

6 Q The skinny filter alters a user's
7 appearance so that they appear thinner; correct?

8 MR. PARKS: Object to the form, outside
9 the scope.

10 A I'm not sure.

11 BY MS. ARMSTRONG:

12 Q The user informs TikTok and
13 ByteDance that "A skinny filter is inherently fat
14 phobic."

15 Correct?

16 A Based on the feedback that
17 they've provided here.

18 Q And the user explains that the
19 skinny filter "adds to poor body image, disordered
20 eating and eating disorders."

21 Correct?

22 A Based on the feedback that
23 they've shared here.

24 Q So in 2023 TikTok and ByteDance
25 had reports that its skinny filter adds to poor

1 A Okay.

2 Q Do you have any reason to dispute
3 the accuracy of this excerpt?

4 A No.

5 Q This user communication to TikTok
6 and ByteDance is from January 4 of 2019; correct?

7 A Correct.

8 Q This message is a one star review
9 of the TikTok platform; right?

10 A Based on what we've discussed
11 earlier.

12 Q The user states, "Add parental
13 controls on this app."

14 Right?

15 A Yes.

16 Q So the user is asking TikTok and
17 ByteDance to create parental controls on the
18 TikTok platform; right?

19 A Based on what they wrote here.

20 MS. ARMSTRONG: We're going to pull up
21 Tab 25B, which we'll mark as Exhibit 25B.

22 (Exhibit 25B was marked for identification.)

23 BY MR. VERRIER:

24 Q We are working with an excerpt
25 from Row 11887.

1 A Okay.

2 Q Do you have any reason to dispute
3 the accuracy of this excerpt?

4 A I don't.

5 Q This user communication to TikTok
6 and ByteDance is from September 14 of 2019;
7 correct?

8 A Yes.

9 Q It was submitted to TikTok and
10 ByteDance by the grandparent of a 7-year-old;
11 correct?

12 A Based on what the user has shared
13 with us here.

14 Q The 7-year-old had a TikTok
15 account; correct?

16 A That's what's referenced.

17 Q In 2019 TikTok and ByteDance had
18 reports of 7-year-olds accessing the TikTok
19 platform; right?

20 MR. PARKS: Object to form.

21 A Based on what this individual
22 shared with us.

23 BY MS. ARMSTRONG:

24 Q This grandparent is contacting
25 TikTok and ByteDance to suggest adding parental

1 in-app timer's passcode negatively impacted user's
2 addiction to TikTok; correct?

3 A That's what this user is sharing
4 with us.

5 Q Has TikTok or ByteDance ever
6 informed users, parents or the public that in 2023
7 users reported that being prompted with the in-app
8 timer -- in-app timer's passcode negatively impact
9 had their addiction to TikTok?

10 MR. PARKS: Object to form, outside the
11 scope.

12 A Not to my knowledge.

13 BY MS. ARMSTRONG:

14 Q We're going to pull up --

15 Let me ask, do you need a break?

16 A A break would be good for me, if
17 that's okay.

18 MS. ARMSTRONG: Yep, that is fine. How
19 about a five-minute break?

20 VIDEOGRAPHER: Stand by. End of Media
21 File 7. Off the record at 4:34.

22 (Recess was taken.)

23 VIDEOGRAPHER: Beginning of Media
24 File 8. We're back on the record at 4:53.

25 MS. ARMSTRONG: We are looking at Tab

1 27A, which we're marking as Exhibit 27A.

2 (Exhibit 27A was marked for identification.)

3 BY MS. ARMSTRONG:

4 Q This is from Exhibit 4, Bates
5 ending _2028, and this is an excerpt of Row 49573.

6 A Okay.

7 Q Do you have any reason to dispute
8 the accuracy of this excerpt?

9 A I don't.

10 Q This user communication to TikTok
11 and ByteDance is from October 27 of 2021; correct?

12 A Correct.

13 Q This user asks TikTok to
14 permanently delete their TikTok account; right?

15 A Correct.

16 Q The user informs TikTok and
17 ByteDance that they want their account deleted
18 because they're addicted to TikTok; right?

19 MR. PARKS: Based on the feedback here.

20 MS. ARMSTRONG: Can we underline the
21 word "addiction," please.

22 BY MS. ARMSTRONG:

23 Q They also report that their
24 TikTok addiction has caused bad consequences in
25 their life; correct?

1 A Based on what they wrote.

2 Q And the user tells TikTok and
3 ByteDance, "I have already deleted the account
4 several times within the 30-day deadline for
5 permanent deletion."

6 Did I read that correctly?

7 MR. PARKS: Object to form.

8 A You did.

9 BY MS. ARMSTRONG:

10 Q So this user has already tried to
11 delete their TikTok account on their own; correct?

12 A That's what they've said.

13 Q In fact, they tried to delete
14 their account several times; right?

15 A Based on what they've shared.

16 Q And the user indicates that there
17 is a 30-day deadline before the account is
18 permanently deleted; correct?

19 A Correct.

20 Q Isn't it true that when a user
21 deletes their account, the account is first
22 deactivated for 30 days before it is permanently
23 deleted?

24 MR. PARKS: Object to the form, outside
25 the scope.

1 A Based on my understanding of the
2 deletion account process, yes.

3 MS. ARMSTRONG: We're going to pull up
4 Tab 34, which we're going to mark as
5 Exhibit 28.

6 (Exhibit 28 was marked for identification.)

7 BY MR. VERRIER:

8 Q Please take a moment to review
9 that.

10 A Could you zoom in on the computer
11 screen?

12 Sorry.

13 Okay, thank you.

14 Q I will represent to you that
15 TikTok and ByteDance produced this document as an
16 accurate depiction of what a user sees when they
17 try deleting their account.

18 Do you have any reason to dispute the
19 accuracy of this document?

20 A I don't.

21 Q Within the document you can see
22 that the user is given the choice to either
23 deactivate or delete their account; correct?

24 A Correct.

25 Q Deactivation is described as

1 "Temporary" and "Leave from TikTok."

2 Do you see that?

3 A I do see that on the screen.

4 Q And users are able to reactivate
5 their account at any time; correct?

6 A Correct.

7 Q Choosing to delete the account
8 will permanently delete the account's data; right?

9 A Correct.

10 Q However, the fine print states,
11 "You may can sell the deletion request by
12 reactivating your account within 30 days."

13 Do you see that?

14 A I do see that.

15 Q So if a user decides they no
16 longer want to permanently delete their account,
17 they can stop the process within that 30-day
18 period; correct?

19 A Correct.

20 Q And the user would then be able
21 to continue using TikTok; right?

22 A That's correct.

23 MR. PARKS: I'm just going to object to
24 all the questions about this document,
25 outside the scope and lacks foundation.

1 Go ahead.

2 BY MS. ARMSTRONG:

3 Q TikTok does not waive or expedite
4 that 30-day reactivation period, do they?

5 A Not to my knowledge.

6 Q So let's look back at this
7 complaint.

8 For this user they report to TikTok and
9 ByteDance, "Due to my addiction, I always end up
10 redownloading the application and reactivating the
11 account."

12 Correct?

13 A I do see that.

14 Q So this user reports they're
15 addicted to TikTok; correct?

16 A They reference that due to their
17 addiction, they always end up redownloading the
18 application, which could be assumed that they're
19 referencing TikTok because they're reaching out to
20 TikTok.

21 Q And that would be during that
22 30-day period; correct?

23 A I would assume so.

24 Q And earlier in the message the
25 user indicates that they have tried deleting the

1 account several times; right?

2 A Yes.

3 Q And isn't it reasonable to
4 conclude that the user also reactivated their
5 account during the 30-day reactivation period
6 several times?

7 MR. PARKS: Object to the form, calls
8 for speculation.

9 A Based off the feedback, it could
10 be assumed that that's something that happened.

11 BY MS. ARMSTRONG:

12 Q And the user reports to TikTok
13 that this constant reactivation is causing them
14 harm; right?

15 A That's what they've said.

16 Q And they ask TikTok and ByteDance
17 to "Suspend my account so I can no longer access
18 it."

19 Correct?

20 MR. PARKS: Object to form.

21 A That's what they shared.

22 BY MS. ARMSTRONG:

23 Q In 2021 TikTok and ByteDance had
24 requests to remove the 30-day reactivation period
25 from the account deletion process; correct?

1 A That's what they're sharing here.

2 Q But every time she tries to
3 delete the account, the mother receives a "Try
4 Again" message; right?

5 A They're referenced still trying
6 to delete the app and receiving a "Try Again"
7 message.

8 But yes, correct.

9 Q Yes. The mother is trying to
10 delete the app and is receiving a "Try Again"
11 message; correct?

12 A Correct.

13 Q The "Try Again" message is
14 preventing her from deleting the app; correct?

15 A That's what they're sharing with
16 us, yeah.

17 Q She concludes "This is done so
18 people can't delete the app."

19 Correct?

20 A That's what they've said.

21 MS. ARMSTRONG: We're going to pull up
22 Tab 27C, which we'll mark as Exhibit 27C.

23 (Exhibit 27C was marked for identification.)

24 BY MS. ARMSTRONG:

25 Q This is an excerpt from Row

1 184763.

2 A Okay.

3 Q Do you have any reason to dispute
4 the accuracy of this excerpt?

5 A I do not.

6 Q This user communication to TikTok
7 and ByteDance is from September 25 of 2024;
8 correct?

9 A Correct.

10 Q This user submission is from a
11 student; right?

12 A That's what they've shared with
13 us, yeah.

14 Q The student reports to TikTok and
15 ByteDance, "I can't delete my account because I'm
16 addicted to it."

17 Correct?

18 A That's what they've shared here,
19 yeah.

20 MS. ARMSTRONG: Can we underline the
21 word "addicted," please.

22 BY MS. ARMSTRONG:

23 Q The student informs TikTok and
24 ByteDance, "I've tried deleting it several times,
25 but I always come back."

1 Right?

2 A That's what they've said.

3 Q So the student has tried deleting
4 their TikTok account several times; right?

5 A Based on their feedback.

6 Q But they always come back and
7 reactivate the account; correct?

8 A Based on their feedback here.

9 Q Because they are addicted to
10 TikTok; right?

11 A That's what they've shared.

12 Q The student explains that they
13 are spending most of their time on TikTok; right?

14 A That's what they've shared.

15 Q And they say this is "not okay,"
16 right?

17 A That's what they've shared.

18 Q So the student recognizes that
19 they have a problem with spending most of their
20 time on TikTok; right?

21 A That's what they've said.

22 Q But they're unable to delete
23 their TikTok account themselves because they are
24 addicted to TikTok; right?

25 A They shared that they'll always

1 come back to it in a 30-day period.

2 Q This student asks TikTok and
3 ByteDance to "Delete it for me so I can never
4 access it again."

5 Right?

6 MR. PARKS: Object to form.

7 A Based on the feedback that
8 they've written, yeah, in the second line there.
9 Thank you.

10 BY MS. ARMSTRONG:

11 Q And the student explicitly asks
12 TikTok and ByteDance, "Don't give me 30 days."

13 Right?

14 MR. PARKS: Object to form.

15 A That's what they've shared.

16 BY MS. ARMSTRONG:

17 Q Isn't it reasonable to conclude
18 that the student is referring to the 30-day
19 reactivation period?

20 A Based on the process of how
21 deleting accounts worked, yes.

22 Q The student does not want the
23 30-day reactivation period because "I'll always
24 come back to it."

25 Right?

1	A	Based on what they've shared.
---	---	-------------------------------

2 Q In 2024 TikTok had requests to
3 remove the 30-day reactivation period from the
4 account deletion process; correct?

5 MR. PARKS: Object to the form.

6 A From this user, that's what
7 they've requested.

8 BY MS. ARMSTRONG:

9 Q Has TikTok or ByteDance ever
10 informed users, parents or the public that in 2024
11 students requested the removal of the 30-day
12 reactivation period from the account deletion
13 process?

14 A Sorry. If you can ask me the
15 question again, that would be great.

16 Q Has TikTok or ByteDance ever
17 informed users, parents or the public that in 2024
18 students requested the removal of the 30-day
19 reactivation period from the account deletion
20 process?

21 MR. PARKS: Object to the form, outside
22 the scope.

23	A	Not to my knowledge.
----	---	----------------------

24 BY MS. ARMSTRONG:

25	Q	In 2024 TikTok and ByteDance had
----	---	----------------------------------

1 reports that students were reactivating their
2 TikTok accounts during the 30-day reactivation
3 period because they were addicted to TikTok;
4 correct?

5 A Based on what this user shared
6 with us.

7 Q Has TikTok or ByteDance ever
8 informed users, parents or the public that in 2024
9 students reported reactivating their TikTok
10 accounts during the 30-day reactivation period
11 because they were addicted to TikTok?

12 MR. PARKS: Object to form, outside the
13 scope.

14 A Not to my knowledge.

15 MS. ARMSTRONG: Let's pull up Tab 27D,
16 which we'll mark as Exhibit 27D.

17 (Exhibit 27D was marked for identification.)

18 BY MS. ARMSTRONG:

19 Q This is an excerpt from Row
20 191413.

21 A Okay.

22 Q Do you have any reason to dispute
23 the accuracy of this excerpt?

24 A I do not.

25 Q This user communication to TikTok

1 and ByteDance is from October 26 of 2024; right?

2 A Correct.

3 Q The user asked TikTok and
4 ByteDance, "Please delete my account immediately.
5 I am unable to wait the 30 days because I'm
6 addicted to this app."

7 Correct?

8 MR. PARKS: Object to the form.

9 A That's what they've said.

10 BY MS. ARMSTRONG:

11 Q So again this user is reporting
12 to TikTok and ByteDance that they are addicted to
13 TikTok; correct?

14 MR. PARKS: Object to the form.

15 A Based on what they're sharing
16 here.

17 MS. ARMSTRONG: Can we underline the
18 word "addicted," please.

19 BY MS. ARMSTRONG:

20 Q And again the user is asking
21 TikTok and ByteDance to delete their account
22 immediately because they're addicted to TikTok;
23 right?

24 MR. PARKS: Object to the form.

25 A They're asking for their account

1 to be deleted immediately without having to wait
2 the 30 days, which could be assumed that they're
3 referencing the deletion period.

4 BY MS. ARMSTRONG:

5 Q And they say they're unable to
6 wait during that 30-day deletion period, correct,
7 or reactivation period?

8 Excuse me.

9 A That's what they've shared in the
10 first line.

11 Q The user says, "Please just
12 delete my account immediately without having to
13 wait 30 days."

14 Right?

15 A Correct.

16 Q In 2024 TikTok and ByteDance had
17 requests to remove the 30-day reactivation period
18 from the account deletion process; correct?

19 MR. PARKS: Object to the form.

20 A That's what the user shared here.

21 BY MS. ARMSTRONG:

22 Q Has TikTok or ByteDance ever
23 informed users, parents or the public that in 2024
24 users requested the removal of the 30-day
25 reactivation period from the account deletion

Exhibit 672B

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT Case No. 4:22-MD-03047-YGR
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION MDL No. 3047

This Document Relates to:
ALL ACTIONS

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

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

THIS DOCUMENT RELATES TO:
ALL ACTIONS

VOLUME II

CONTINUED VIDEOTAPED DEPOSITION OF ANDREW THOMAS TOMLINSON

NASHVILLE, TENNESSEE

OCTOBER 2, 2025

1 VIDEOGRAPHER: We are now on the
2 record. My name is Travis Temples. I'm the
3 videographer for Golkow.

4 Today's date is October 2, 2025. The
5 time is now 9:00 a.m. Central.

6 This video deposition is being held at
7 Nelson Mullins, 1222 Demonbreun Street,
8 Suite 1700, Nashville, Tennessee 37203 in the
9 matter of Social Media Adolescent Addiction
10 Litigation.

11 This is the continuation of the
12 deposition of Andy Tomlinson.

13 Counsel will be noted on the
14 stenographic record.

15 The court reporter is Gina Williams,
16 and will now swear in the witness.

17 - - - -

18 WHEREUPON,

19 ANDREW THOMAS TOMLINSON
20 was called as a witness and, after having been first duly
21 sworn, was deposed and testified as follows:

22 EXAMINATION, CONTINUED

23 BY MS. ARMSTRONG:

24 Q Good morning, Mr. Tomlinson.
25 Thank you for coming back. I'm hoping that we can

1 knock this out real quick in the morning, but I do
2 have some more questions for you.

3 So do you understand that you're still
4 under oath?

5 A I do.

6 MS. ARMSTRONG: We're going to pull up
7 Tab 28A, which we're going to mark as 29A.

8 (Exhibit 29A was marked for identification.)

9 BY MS. ARMSTRONG:

10 Q This is out of Exhibit 4, Bates
11 ending _2028, and the excerpt is from Row 10000.

12 A Okay.

13 Q Do you have any reason to dispute
14 the accuracy of this excerpt?

15 A I do not.

16 Q This user communication to TikTok
17 and ByteDance is from August 8 of 2020; correct?

18 A Correct.

19 Q The user is reporting a TikTok
20 account; right?

21 A Yes.

22 Q An account that they say is
23 promoting eating disorders; right?

24 A Based on their feedback they
25 shared with us.

1 Q And they provide an example of
2 how this user is promoting eating disorders;
3 right?

4 A Based on the feedback, they do
5 share an example.

6 Q They say that the user posted an
7 image of Eugenia Cooney; correct?

8 A I do see that.

9 Q Are you familiar with Ms. Cooney?

10 A I'm not.

11 MS. ARMSTRONG: Let's pull up Tab 20 --
12 or excuse me -- 35, which we're going to mark
13 as Exhibit 30.

14 (Exhibit 30 was marked for identification.)

15 BY MS. ARMSTRONG:

16 Q I'll give you a moment to review
17 that.

18 A Thank you.

19 Q Does this refresh your
20 recollection of who Ms. Cooney is?

21 A This person looks familiar to me.

22 Q Does this person look familiar to
23 you as a TikTok influencer?

24 A I have seen -- seen them.

25 I didn't recall the name of the

1 individual. Thank you.

2 Q I'm going to represent to you
3 that this is a depiction of Ms. Cooney.

4 Will you accept that?

5 A Yes.

6 Q We're going to go back to the
7 complaint.

8 This user reports that the account is
9 showing images of Ms. Cooney; right?

10 A The feedback does state that,
11 yeah.

12 Q But not only are they showing
13 images of her, they are referring to Ms. Cooney as
14 the "blueprint."

15 Do you see that?

16 A I do see that feedback.

17 Q Now, a blueprint is commonly used
18 to refer to a model or a guide for others to
19 follow; right?

20 MR. PARKS: Object to the form, outside
21 the scope.

22 A Can you ask the question again?

23 BY MS. ARMSTRONG:

24 Q Sure.

25 A blueprint is commonly used to refer

1 to a model or a guide for others to follow; right?

2 MR. PARKS: Same objections.

3 A Based on my understanding of a
4 blueprint.

5 BY MS. ARMSTRONG:

6 Q So by referring to Ms. Cooney as
7 the blueprint, they are saying she is the model or
8 guide for others to follow; right?

9 MR. PARKS: Object to the form, calls
10 for speculation, outside the scope.

11 A Can you ask the question again?

12 BY MS. ARMSTRONG:

13 Q Sure.

14 By referring to Ms. Cooney as the
15 blueprint, they are saying she is the model or
16 guide for others to follow; right?

17 MR. PARKS: Same objections.

18 A Based on their feedback.

19 BY MS. ARMSTRONG:

20 Q That's supported by this report,
21 which says, The user is telling others that
22 Ms. Cooney is the desirable body type."

23 Correct?

24 MR. PARKS: Object to the form.

25 A Based on what they wrote.

1 BY MS. ARMSTRONG:

2 Q Then the user provides methods
3 for achieving this ideal body; right?

4 MR. PARKS: Object to the form.

5 A They're sharing the user at the
6 top of the screen and then -- or at the top of the
7 feedback and referencing what they are promoting
8 and how to do that.

9 I'm sorry.

10 BY MS. ARMSTRONG:

11 Q The user suggests "starving
12 yourself, throwing up after meals," and "not
13 stopping until you can see your bones."

14 Do you see that in this report?

15 A I do see that feedback.

16 Q We can agree that starving
17 yourself can be harmful; right?

18 MR. PARKS: Object to the form, outside
19 the scope of the Notice.

20 A Eating is definitely healthy for
21 you. So starving is not the answer.

22 BY MS. ARMSTRONG:

23 Q And we can agree that starving
24 yourself can be harmful to children; right?

25 MR. PARKS: Same objections.

1 A Can you ask that question again?

2 BY MS. ARMSTRONG:

3 Q Sure.

4 We can agree that starving yourself can
5 be harmful to children; right?

6 MR. PARKS: Object to the form, outside
7 the scope of the Notice.

8 A Based on my understanding.

9 BY MS. ARMSTRONG:

10 Q The user says, "This is harmful
11 because it promotes eating disorders."

12 Right?

13 A That is what they've shared in
14 the feedback.

15 Q And they demand that the account
16 is taken down immediately.

17 Do you see that?

18 A I do see that in their feedback.

19 Q Because it could affect younger
20 users on the app; right?

21 A Based on their feedback here.

22 Q As early as 2020, TikTok and
23 ByteDance had reports that Eugenia Cooney was
24 being depicted as the blueprint for the ideal body
25 type; correct?

1 MR. PARKS: Object to the form.

2 A Based on their feedback here they
3 shared with us in this message.

4 BY MS. ARMSTRONG:

5 Q As early as 2020, TikTok and
6 ByteDance had reports that users are being told to
7 starve themselves to achieve a desirable body type
8 like Eugenia Cooney; correct?

9 MR. PARKS: Object to the form.

10 A That's what they wrote here.

11 MS. ARMSTRONG: We're going to pull up
12 Tab 28B, which we're marking as Exhibit 29B.

13 (Exhibit 29B was marked for identification.)

14 BY MS. ARMSTRONG:

15 Q This is an excerpt from Row
16 12360.

17 Do you have any reason to dispute the
18 accuracy of this excerpt?

19 A I don't.

20 Q This user communication to TikTok
21 and ByteDance is from December 20 of 2020;
22 correct?

23 A Correct.

24 Q This user is also reporting an
25 account; correct?

1 A Yes.

2 Q They say, "I'm e-mailing to
3 report an account for promoting eating disorders
4 to young vulnerable people."

5 Do you see that?

6 A I do see that.

7 Q So, again, there is a report of a
8 user promoting eating disorders; correct?

9 A Based on their feedback here,
10 yes.

11 Q And they are promoting eating
12 disorders to "young vulnerable people."

13 Right?

14 A Based on their feedback, yes.
15 Thank you.

16 MS. ARMSTRONG: Could we please
17 underline "young vulnerable people," please.

18 BY MS. ARMSTRONG:

19 Q The user indicates that "they are
20 well-known online," right?

21 A Yes.

22 Q In fact, "They are well-known
23 online for promoting eating disorders and causing
24 people to relapse."

25 Do you see that?

1 A I do see that.

2 Q They are causing people to
3 relapse from their own eating disorders; right?

4 MR. PARKS: Object to the form.

5 A Based on their feedback, it could
6 be assumed that that's what they're referencing.

7 BY MS. ARMSTRONG:

8 Q This person has had so much
9 influence that they are directly impacting others
10 to relapse from their eating disorders; correct?

11 MR. PARKS: Object to the form,
12 misstates the document.

13 A Based on their feedback.

14 BY MS. ARMSTRONG:

15 Q And this person is Eugenia
16 Cooney; right?

17 A I see their reference of Eugenia
18 Cooney.

19 Q So Eugenia Cooney is so
20 influential that she has caused others to relapse;
21 correct?

22 MR. PARKS: Object to the form, outside
23 the scope, mischaracterizes the document.

24 A Based on what they're referencing
25 here.

1 BY MS. ARMSTRONG:

2 Q And this person wants her account
3 removed because she is promoting eating disorders
4 to young vulnerable people; right?

5 A In their feedback they would like
6 to report the account.

7 BY MS. ARMSTRONG:

8 Q Promoting eating disorders is
9 against TikTok's Community Guidelines; is it not?

10 MR. PARKS: Object to the form, outside
11 the scope.

12 You can answer if you know.

13 A I would need to look at the
14 Community Guidelines.

15 BY MS. ARMSTRONG:

16 Q So as early as 2020, TikTok and
17 ByteDance had reports that Eugenia Cooney was
18 promoting eating disorders; correct?

19 MR. PARKS: Object to the form.

20 A Based on their feedback here.

21 BY MS. ARMSTRONG:

22 Q Has TikTok or ByteDance ever
23 informed users, parents or the public that in 2020
24 user reported that Eugenia Cooney was promoting
25 eating disorders on the TikTok platform?

1 MR. PARKS: Object to the form, outside
2 the scope.

3 A Not to my knowledge.

4 BY MS. ARMSTRONG:

5 Q As early as 2020, TikTok and
6 ByteDance had reports that Eugenia Cooney was
7 well-known online for promoting eating disorders;
8 correct?

9 MR. PARKS: Object to the form, asked
10 and answered.

11 A Based on what they wrote here.

12 BY MS. ARMSTRONG:

13 Q Has TikTok or ByteDance ever
14 informed users, parents or the public that in 2020
15 users reported that Eugenia Cooney was well-known
16 for promoting eating disorders on the TikTok
17 platform?

18 MR. PARKS: Object to form, outside the
19 scope, asked and answered.

20 A Not to my --

21 MR. PARKS: Sorry.

22 A Not to my knowledge.

23 BY MS. ARMSTRONG:

24 Q As early as 2020, TikTok and
25 ByteDance had reports that Eugenia Cooney was

1 promoting eating disorders to young vulnerable
2 people; correct?

3 MR. PARKS: Object to the form.

4 A Based on what they've written
5 here.

6 BY MS. ARMSTRONG:

7 Q Has TikTok or ByteDance ever
8 informed users, parents or the public that in 2020
9 users reported that Eugenia Cooney was promoting
10 eating disorders to young vulnerable people on the
11 TikTok platform?

12 MR. PARKS: Object to form, outside the
13 scope, asked and answered.

14 A Not to my knowledge.

15 BY MS. ARMSTRONG:

16 Q As early as 2020, TikTok and
17 ByteDance had reports that Eugenia Cooney
18 influenced other TikTok users to relapse from
19 their eating disorders?

20 MR. PARKS: Object to the form,
21 misstates the document, asked and answered.

22 A Not to my knowledge.

23 BY MS. ARMSTRONG:

24 Q Has TikTok or ByteDance ever
25 informed users, parents or the public that in 2020

1 Eugenia Cooney influenced other TikTok users to
2 relapse from their eating disorders?

3 MR. PARKS: Object to the form, outside
4 the scope, misstates the document, asked and
5 answered.

6 A Not to my knowledge.

7 BY MS. ARMSTRONG:

8 Q At the bottom do you see the
9 response that was sent back to the reporter?

10 A I do see that.

11 Q This response tells the reporter
12 how to block Eugenia Cooney's account; right?

13 A It also says --

14 It also shares information about how to
15 report accounts as well.

16 But, yes, there is reference of
17 blocking in the feedback.

18 Q The response does not say that
19 TikTok will delete Eugenia's account, does it?

20 MR. PARKS: Object to the form.

21 A Based on this feedback that this
22 team replied with, it does not.

23 BY MS. ARMSTRONG:

24 Q TikTok did not delete Eugenia
25 Cooney's account, did they?

1 MR. PARKS: Object to the form, outside
2 the scope. You can answer if you know.

3 A I don't know.

4 MS. ARMSTRONG: We're going to pull up
5 Tab 28C, which we'll mark as 29C.

6 This is out of Exhibit 5 Bates ending
7 _2029.

8 (Exhibit 29C was marked for identification.)

9 BY MS. ARMSTRONG:

10 Q It is an excerpt from Row 91596.

11 A Okay.

12 Q Do you have any reason to dispute
13 the accuracy of this excerpt?

14 A I don't.

15 Q This user communication to TikTok
16 and ByteDance is from July 18 of 2023; correct?

17 A That's correct.

18 Q This is another report related to
19 Ms. Cooney's account; is it not?

20 A Can you ask the question again?

21 Q This is another report related to
22 Ms. Cooney's account; correct?

23 A Based on what they're sharing
24 here, they're referencing Eugenia's health.

25 Q Do you recall that I asked

1 whether TikTok deleted Eugenia Cooney's account?

2 MR. PARKS: Object to the form.

3 A I do.

4 BY MS. ARMSTRONG:

5 Q This report is from 2023, and
6 TikTok and ByteDance are still receiving reports
7 about Eugenia Cooney's account; correct?

8 MR. PARKS: Object to the form.

9 A Based on what they're sharing
10 here.

11 BY MS. ARMSTRONG:

12 Q So TikTok did not delete
13 Ms. Cooney's account, did they?

14 MR. PARKS: Object to the form, outside
15 the scope.

16 A Not to my knowledge.

17 BY MS. ARMSTRONG:

18 Q That means --

19 Strike that.

20 Let's look at the complaint.

21 They say, "TikTok should not penalize
22 me for expressing genuine concern for Eugenia's
23 health."

24 Did I read that correctly?

25 A You did.

1 Q Can we agree that "TT" refers to
2 TikTok?

3 A We can.

4 Q So this user says, "TikTok has
5 penalized them for raising concerns about
6 Eugenia's health."

7 Right?

8 MR. PARKS: Object to the form.

9 A Based on what they've written.

10 BY MS. ARMSTRONG:

11 Q They say, "It's irresponsible of
12 TikTok to continue to allow her to profit from her
13 ED on TikTok."

14 Did I read that correctly?

15 A You did read that correctly.

16 Q And I believe yesterday you
17 testified that "ED" was eating disorder?

18 A We did align on that yesterday.

19 Q Here --

20 Oh, excuse me.

21 "Her" in this sentence is Ms. Cooney;
22 right?

23 MR. PARKS: Object to the form.

24 A We can assume so.

25

1 BY MS. ARMSTRONG:

2 Q This user is saying that it's
3 TikTok's fault; correct?

4 MR. PARKS: Object to the form.

5 MS. ARMSTRONG: I am going to strike
6 that question, and I'm going to reask.

7 BY MS. ARMSTRONG:

8 Q This user is saying that it's
9 TikTok that's at fault here; right?

10 MR. PARKS: Object to the form.

11 A They share that it's
12 irresponsible for TikTok to continue to allow her
13 to profit.

14 MS. ARMSTRONG: We're going to pull up
15 Tab 28D, which we're going to mark as 29D.

16 (Exhibit 29D was marked for identification.)

17 BY MS. ARMSTRONG:

18 Q This is an excerpt from Row --
19 This is an excerpt from Row 99040.

20 A Correct.

21 Q Have you had a moment to review?

22 A Oh, sorry. No.

23 Okay.

24 Q Do you have any reason to dispute
25 the accuracy of this excerpt?

1 A I do not.

2 Q This user communication to TikTok
3 and ByteDance is from September 6 of 2023;
4 correct?

5 A Correct.

6 Q This is another complaint about
7 Ms. Cooney; correct?

8 A They do reference Ms. Cooney.

9 Q This user says they blocked
10 Ms. Cooney's account; right?

11 A They do reference that.

12 Q They blocked her account because
13 they "do not want to see someone promoting severe
14 self harm, ED and suicidal behavior."

15 Correct?

16 A Based on what they're sharing
17 here.

18 Q So this user says that not only
19 is Ms. Cooney promoting eating disorders, but she
20 is also promoting self-harm; correct?

21 A Based on what they're sharing in
22 the feedback.

23 Q Mrs. Cooney is also promoting
24 suicidal behavior; right?

25 A Based on what they're sharing

1 here.

2 Q They say her account is
3 "extremely harmful."

4 Right?

5 A They reference that her content
6 is extremely harmful.

7 Q It is extremely harmful because
8 she is promoting self harm, eating disorders and
9 suicide; right?

10 MR. PARKS: Object to the form.

11 A Based on what they're sharing
12 here.

13 BY MS. ARMSTRONG:

14 Q The user informs TikTok and
15 ByteDance that they are continuously blocking
16 Ms. Cooney's page; right?

17 MR. PARKS: Object to form.

18 A They do say that they feel like
19 they're continuously blocking the page.

20 BY MS. ARMSTRONG:

21 Q The user has also continuously
22 used the Not Interested button for Ms. Cooney's
23 videos; right?

24 A That's what they've shed.

25 Q But they still see Ms. Cooney's

1 videos; right?

2 A Based on how they're sharing that
3 feedback with us.

4 Q At the end of this message, the
5 user says Ms. Cooney's account "needs to be taken
6 down."

7 Right?

8 A They do.

9 MS. ARMSTRONG: We're going to pull up
10 Tab 28E, which we'll mark as Exhibit 29E.

11 (Exhibit 29E was marked for identification.)

12 BY MS. ARMSTRONG:

13 Q This is an excerpt from Row
14 101242.

15 A Okay.

16 Q This --

17 Strike that.

18 Any reason to dispute the accuracy of
19 this excerpt?

20 A No.

21 Q This user communication to TikTok
22 and ByteDance is from September 22 of 2023;
23 correct?

24 A Correct.

25 Q This is another complaint about

1 Ms. Cooney; correct?

2 A They do reference Eugenia, yeah.

3 Q So TikTok did not take down

4 Ms. Cooney's account, did they?

5 MR. PARKS: Object to the form, outside
6 the scope.

7 A I'm not aware.

8 BY MS. ARMSTRONG:

9 Q Can we agree that --

10 Strike that.

11 This user says "Eugenia promotes
12 anorexia."

13 Correct?

14 A Based on what they wrote here.

15 Q So this is yet another user
16 informing TikTok and ByteDance that Ms. Cooney is
17 promoting anorexia on the TikTok platform; right?

18 MR. PARKS: Object to form.

19 A Based on the feedback written
20 here.

21 BY MS. ARMSTRONG:

22 Q And anorexia is a very serious
23 eating disorder; right?

24 MR. PARKS: Object to the form, outside
25 the scope.

1 A Based on my knowledge and
2 understanding of anorexia, yes.

3 BY MS. ARMSTRONG:

4 Q Isn't it true that people can die
5 from anorexia?

6 MR. PARKS: Object to the form, outside
7 the scope.

8 A I believe so.

9 BY MS. ARMSTRONG:

10 Q The user says, "Allowing her to
11 have a platform enables her to be unhealthy and
12 ultimately die."

13 Correct?

14 A Based on what they wrote.

15 Q This user is telling TikTok and
16 ByteDance that by allowing Ms. Cooney to have an
17 account, they are enabling her own unhealthy
18 lifestyle; right?

19 MR. PARKS: Object to form.

20 A Based on the feedback that's
21 written here.

22 BY MS. ARMSTRONG:

23 Q And this user believes Ms. Cooney
24 will ultimately die from her eating disorder;
25 correct?

1 MR. PARKS: Object to the form.

2 A That's what they've shared.

3 BY MS. ARMSTRONG:

4 Q This user says, "We cannot allow
5 this to continue. We are watching her literally
6 die in realtime."

7 Do you see that?

8 A I do see that.

9 Q Then they say, "TikTok has an
10 opportunity to intervene and be the change she
11 needs to become healthy."

12 Did I read that correctly?

13 MR. PARKS: Object to the form.

14 A "Interfere" instead of
15 "intervene," but --

16 BY MS. ARMSTRONG:

17 Q My apologies. I'll reask the
18 question.

19 A Okay.

20 Q Then they say, "TikTok has an
21 opportunity to interfere and be the change she
22 needs to become healthy."

23 Did I read that correctly?

24 A You did.

25 Q And by "interfere" they mean

1 deleting Ms. Cooney's account; correct?

2 MR. PARKS: Object to form.

3 A I would assume based on what
4 they're referencing here.

5 MS. ARMSTRONG: We're going to pull up
6 Tab 28F, which we'll mark as 29F.

7 (Exhibit 29F was marked for identification.)

8 BY MS. ARMSTRONG:

9 Q This is an excerpt from Row
10 102418.

11 A Okay.

12 Q Do you have any reason to dispute
13 the accuracy of the excerpt?

14 A I don't.

15 Q This user communication to TikTok
16 and ByteDance is from October 1 of 2023; correct?

17 A Correct.

18 Q And this is another complaint
19 about Ms. Cooney; correct?

20 A The feedback does reference
21 Eugenia Cooney.

22 Q This complaint says, "TikTok does
23 not tolerate eating disorder promotions, but you
24 continue to allow the world to view Eugenia
25 Cooney."

1 Did I read that correctly?

2 A You did.

3 Q This user points out that
4 promotion of eating disorders violates TikTok's
5 Community Guidelines; correct?

6 MR. PARKS: Object to the form.

7 A They're referencing what TikTok
8 does and does not tolerate, which could be alluded
9 to the Community Guidelines.

10 MS. ARMSTRONG: We're going to pull up
11 Tab 28G, which we're going to mark as 29G.

12 (Exhibit 29G was marked for identification.)

13 BY MS. ARMSTRONG:

14 Q This is an excerpt from Row
15 103043.

16 A Okay.

17 Q Do you have any reason to dispute
18 the accuracy of this excerpt?

19 A I don't.

20 Q This user communication to TikTok
21 and ByteDance is from October 5th of 2023;
22 correct?

23 A Correct.

24 Q This is another complaint about
25 Ms. Cooney; correct?

1 A Correct, based on the feedback.

2 Q This user also wants Ms. Cooney
3 banned from TikTok; correct?

4 A Based on what they're sharing
5 here.

6 Q Because Ms. Cooney promotes
7 eating disorders; right?

8 A Based on what they're sharing
9 here.

10 Q They say, "She is harmful to
11 minors."

12 Do you see that?

13 A I do see that. Thank you.

14 MS. ARMSTRONG: Could we underline "she
15 is harmful to minors," please.

16 BY MS. ARMSTRONG:

17 Q She is harmful to minors because
18 she's promoting anorexia; right?

19 A Based on what they wrote.

20 Q She is harmful to minors because
21 she's promoting an eating disorder that can be
22 deadly; correct?

23 MR. PARKS: Object to form.

24 A Based on what they're --

25 Based on what they've provided here.

1 BY MS. ARMSTRONG:

2 Q Then the user identifies exactly
3 what section of the Community Guidelines
4 Ms. Cooney is violating; correct?

5 A I do see that they reference the
6 Community Guidelines and reference a specific
7 section.

8 Q They say she's violating the
9 "Suicide, Disordered Eating" and "Unhealthy Body
10 Image" sections of the Community Guidelines;
11 correct?

12 A Based on what that they've
13 provided.

14 Q And they demand that Ms. Cooney
15 is permanently banned from TikTok; right?

16 A Based on what they wrote and
17 requested.

18 MS. ARMSTRONG: We're going to pull up
19 28H, which we'll mark as 29H.

20 (Exhibit 29H was marked for identification.)

21 BY MS. ARMSTRONG:

22 Q This is an excerpt from Row
23 103549.

24 A Thank you.

25 Q Do you have any reason to dispute

1 the accuracy of the excerpt?

2 A I don't.

3 Q This user communication to TikTok
4 and ByteDance is from October 7 of 2023; correct?

5 A Correct.

6 Q This is another complaint about
7 Ms. Cooney; correct?

8 A Correct.

9 Q The user says they submitted two
10 reports for Ms. Cooney's account; right?

11 A I do see that.

12 Q They reported her twice because
13 she is glorifying anorexia; right?

14 A Based on what they've shared
15 here.

16 Q They say her glorification of
17 anorexia "has been incredibly damaging to young
18 girls for years."

19 Do you see that?

20 A I do see that.

21 MS. ARMSTRONG: Can we please underline
22 "damaging to young girls for years."

23 BY MS. ARMSTRONG:

24 Q At this point TikTok already had
25 reports that Ms. Cooney was harming its young

1 audience for years; did they not?

2 MR. PARKS: Object to the form.

3 A I believe, based on the dates we
4 referenced earlier, there were -- there were --
5 there was feedback provided referencing Eugenia
6 Cooney.

7 BY MS. ARMSTRONG:

8 Q Reports all the way back to 2020;
9 correct?

10 A Is that when I first --

11 Q You can take a look.

12 A Okay.

13 Q We're looking at Exhibit 29A
14 and B.

15 A Thank you.

16 I do see a reference from 2020.

17 Q And now we're in 2023, and TikTok
18 and ByteDance are still receiving complaints about
19 Ms. Cooney's account; correct?

20 MR. PARKS: Object to the form.

21 A Based on the feedback that's
22 shared here.

23 MS. ARMSTRONG: We're going to pull up
24 Tab 28I, which we'll mark as Exhibit 29I.

25 (Exhibit 29I was marked for identification.)

1 BY MS. ARMSTRONG:

2 Q This is an excerpt from Row
3 114277.

4 A Okay.

5 Q Do you have any reason to dispute
6 the accuracy of this excerpt?

7 A No.

8 Q This user communication to TikTok
9 and ByteDance is from December 11 of 2023;
10 correct?

11 A Correct.

12 Q And this is another complaint
13 about Ms. Cooney; correct?

14 A Based on the feedback shared.

15 Q The user says "pleassse" with
16 three Ss "remove Eugenia's Cooney's account."
17 Correct?

18 A Correct.

19 Q They want her account removed
20 because there are people who want to follow in her
21 shoes; right?

22 A Based on the feedback shared.

23 MS. ARMSTRONG: Can we please underline
24 "There's people who want to follow her
25 shoes."

1 CERTIFICATE

2 I, Gina Williams, Registered Professional Court
3 Reporter, do certify that the above deposition was reported
4 by me and that the foregoing transcript is a true and
5 accurate record to the best of my knowledge, skills, and
6 ability.

7 I further certify that I am not an employee of
8 counsel or any of the parties, nor a relative or employee of
9 any attorney or counsel connected with the action, nor
10 financially interested in the action.

11 Subscribed and sworn to before me when taken this
12 2nd day of October, 2025.

13
14
15 <%35221,Signature%>

16 _____
17 GINA WILLIAMS, RPR, CRR
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