

AMENDED Exhibit 683

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

Amy Classen Ulucay

1

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT :MDL NO.
ADDICTION/PERSONAL INJURY PRODUCTS :3047
LIABILITY LITIGATION :
THIS DOCUMENT RELATES TO: :CASE NO.
ALL ACTIONS :4:22-MD-
 :03047-YGR
 :

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

COORDINATION PROCEEDING SPECIAL TITLE :
(RULE 3.550) :
 :
SOCIAL MEDIA CASES :
 :JUDICIAL
 :COUNCIL
THIS DOCUMENT RELATES TO: :PROCEEDING
 :NO. 5255
ALL ACTIONS :
 :JUDGE
 :CAROLYN B.
 :KUHL
 :

DEPOSITION UNDER VIDEO EXAMINATION OF
AMY ULUCAY (CLASSEN)

VOLUME I

February 5, 2025

Videotaped hybrid deposition of
AMY ULUCAY (CLASSEN), taken pursuant to notice, was
held at Regus Conference Center, 520 White Plains
Road, Tarrytown, New York, beginning at 10:08 a.m.,
on the above date, before Michelle L. Ridgway, a
Registered Professional Reporter, Certified Court
Reporter (NJ-CCR # XI02126), Certified Realtime
Reporter, Certified Shorthand Reporter (CA-CSR
14592), and Notary Public.

1 - - -

2 THE VIDEOGRAPHER: We are now on
3 the record.

4 My name is Danny Ortega. I'm the
5 legal videographer for Golkow Litigation Services.

6 Today's date is February 5, 2025,
7 and the time is 10:08 a.m.

8 This video deposition is being held
9 at 520 White Plains Road, Tarrytown, New York, in
10 the matter of Social Media Adolescent Addiction
11 Personal Injury. The deponent today is Amy Ulucay.

12 All counsel will be noted on the
13 stenographic record.

14 The court reporter today is
15 Michelle Ridgway, and she will now swear in the
16 witness.

17 - - -

18 ... AMY ULUCAY (CLASSEN), having
19 been first duly sworn, was examined and testified
20 as follows:

21 - - -

22 EXAMINATION

23 - - -

24 BY MR. LONGER:

25 Q. Good morning, Ms. Ulucay. By

1 agreement, you've graciously permitted us to refer
2 to you by your maiden name. So would you please
3 begin by stating your full name, including your
4 maiden name.

5 A. Yes. My name is Amy Marie Ulucay.
6 My maiden name is Amy Marie Classen.

7 Q. And just to be clear, during the
8 time that you worked at ByteDance/TikTok, you were
9 under your maiden name, correct?

10 A. Yes.

11 Q. That's a "yes"?

12 A. Yes.

13 Q. All right. So I'm here today to
14 take your deposition. We're going to -- I'm going
15 to be remote. I'm not in the room with you. I
16 hope it's obvious to you.

17 Who is in the room with you?

18 A. My personal counsel? Is that --
19 and the stenographer and the videographer.

20 Q. Okay. Is it just one attorney?

21 A. There are three attorneys here.

22 Q. All right. And thank you for that.
23 So tell me your current address.

24 A. [REDACTED]
25 [REDACTED]

1 the sauce.

2 (Document marked for identification
3 as Ulucay Exhibit 1.)

4 BY MR. LONGER:

5 Q. Ms. Classen, I don't expect you to
6 recognize this document. I created it. It was
7 based off of your LinkedIn profile.

8 Is it correct that you are on
9 LinkedIn?

10 A. Yes.

11 Q. And is it correct that you provide
12 on your LinkedIn profile information about your
13 career, so to speak?

14 A. Yes.

15 Q. And am I also correct that you
16 worked -- well, first, to begin, I understand that
17 you graduated from Hamline University in 2011; is
18 that correct?

19 A. Yes.

20 Q. All right. And you have a Bachelor
21 of Arts in Latin American studies; is that right?

22 A. Yes. Yes.

23 Q. So I'm sure that prepared you to
24 immediately go forth and work for Etsy; is that
25 right?

1 A. Yes.

2 Q. And that was your first job; is
3 that right?

4 A. No.

5 Q. Oh. What was your first job out of
6 college?

7 A. Oh, out of college. I had done --
8 I worked at a company called Latin American
9 Studies -- I'm sorry -- Latin American Markets for
10 a while as a financial intern there.

11 I also was a waitress for some
12 time. I had some internships. I don't -- yes,
13 that's all.

14 Q. All right. And I take it that you
15 were interested in another career and you moved on?

16 A. Yes. Yes.

17 Q. Okay. And the first job that you
18 found was identified on this exhibit --

19 MR. LONGER: Oh, and by the way,
20 let's mark this as Exhibit 1.

21 BY MR. LONGER:

22 Q. And on Exhibit 1, you see Etsy. Is
23 it correct that you worked there from March 12th
24 to -- 2012 to June 2014?

25 A. Yes.

1 Q. And is it also correct that you
2 were the senior trust and safety agent there?

3 A. Yes.

4 Q. All right. And your next job, is
5 it correct that you worked at Meetup?

6 A. Yes.

7 Q. And how long did you work there?

8 A. To be honest, I don't remember the
9 exact dates. They are the ones that are listed on
10 LinkedIn. So if this came from LinkedIn, I would
11 be referencing this too, in terms of the dates,
12 so...

13 Q. Okay. So approximately
14 September 2016 to January -- I'm sorry.

15 June 2014 until May 2018; is
16 that -- is that approximately right?

17 A. Oh, yeah. Yes. Yes. Mm-hmm.

18 Q. All right. And what was it that
19 led you to leave Meetup?

20 A. I, at that point in my career, had
21 done quite a bit of sort of generalist trust and
22 safety work, and as you can see, I'd done program
23 management, policy management, operations work, and
24 the only area that I had yet to grow into was in
25 people management and in operations management.

1 So I left to head up a trust and
2 safety department at another global social media
3 company in order to learn those skills.

4 Q. That's something that interests
5 you, people management and operations management?

6 A. Yes. Yes.

7 Q. Fair enough.

8 All right. And then you were
9 employed at a company called Amino Apps; is that
10 correct?

11 A. Yes.

12 Q. And is it also correct you were
13 there approximately May 2018 to January 2020?

14 A. Yes.

15 Q. All right. So that was about one
16 year and nine months, if my math is correct. Is
17 that fair to say?

18 A. Yes.

19 Q. And what caused you to move on from
20 Amino Apps?

21 A. The company was shutting down.
22 They ended up laying everybody off.

23 Q. All right. And I take it you were
24 looking for a job. And your next job was with
25 whom?

1 A. With ByteDance.

2 Q. All right. And is it correct that
3 you worked for ByteDance from April 2020 until --
4 this is November 2021, but I understand you -- is
5 that incorrect, that you left earlier than
6 November 2021?

7 A. Meaning -- yeah, it was, I think,
8 October.

9 Q. Right.

10 A. Yes.

11 Q. My understanding is that your last
12 day at ByteDance was October 15, 2021.

13 A. Yes --

14 Q. Does that --

15 A. -- I think that is correct.

16 Q. All right. But this comes off of
17 your LinkedIn, so it's approximate dates?

18 A. Yes.

19 Q. Is that where you're going?

20 Okay. And I literally pulled from
21 your LinkedIn profile.

22 But is it correct that when you
23 left --

24 MR. LONGER: Vince, if you'd bring
25 that back up, it would be easier to read.

1 BY MR. LONGER:

2 Q. -- you were the global head of
3 minor safety, and you were leading a team of
4 program managers to design and implement the minor
5 safety product roadmap, which included detection
6 and moderation strategies, data analytics, and
7 trend monitoring, and strategic partnerships; is
8 that correct?

9 A. Yes.

10 Q. And you had core areas of
11 oversight, including age assurance, predator
12 detection, product design for minor privacy and
13 safety, and content classification?

14 A. Yes.

15 Q. Great. And there came a time when
16 you left -- well, let me -- let me go back.

17 When you joined ByteDance, did you
18 know that it had a platform called TikTok?

19 A. Yes.

20 Q. And did you know TikTok was
21 launched in the United States and elsewhere in
22 May 2017?

23 A. I don't know that I knew the
24 founding date, necessarily.

25 Q. All right. Did you know that it

1 MR. WEINKOWITZ: Fred, do you want
2 to take a break so we can get you the document?

3 MR. LONGER: Yeah. I was thinking
4 maybe that's -- can we go off the record, please.

5 THE VIDEOGRAPHER: The time right
6 now is 12:30 p.m. We are off the record.

7 (Brief pause.)

8 THE VIDEOGRAPHER: The time right
9 now is 12:35 p.m. We're back on the record.

10 BY MR. LONGER:

11 Q. Ms. Classen, we're going to move on
12 while we clean up the issue with the exhibits.

13 So the next document I'd like to
14 speak to you about is what I'm going to call
15 Exhibit Number 7. It's Tab E-9.

16 (Document marked for identification
17 as Ulucay Exhibit 7.)

18 BY MR. LONGER:

19 Q. Ms. Classen, do you have that
20 before you, Exhibit 7?

21 A. Yes. "Underage Detection and
22 Appeals Questions."

23 Q. Perfect.

24 Are you familiar with this
25 document?

1 A. Yes.

2 Q. Okay. This -- is it something that
3 you wrote?

4 A. Yes.

5 Q. How do you know that you wrote it?

6 A. I remember this, I believe. This
7 is part of a larger document.

8 Q. Is that right?

9 A. I --

10 Q. So I'll just -- I'll accept that.
11 I don't know that.

12 A. Okay.

13 Q. I believe, the way it was produced
14 to us, is just this.

15 So real quick, do you see on the
16 first page it talks about, underneath the heading
17 that you just described, "underage user metrics"?

18 A. Yes.

19 Q. All right. And -- and this refers,
20 globally, that there are around 37 million underage
21 accounts accessing the platform, correct?

22 A. So in terms of the actual metrics
23 being used here, all of this, just to be clear, was
24 conjecture and estimates that the data analysts
25 were doing. So these were not confirmed underage

1 users that we were aware of.

2 But, yes, this was the estimate --

3 Q. All right. But those estimates
4 were coming to you to implement a policy -- I'm
5 sorry -- to implement a program that policy wanted
6 you to perform to get underage users off the
7 platform, right?

8 A. Yes.

9 Q. Okay. And what was the estimate
10 that they gave you for the United States?

11 A. 4,758,841.

12 Q. All right. And those are kids
13 under the age of 13, right?

14 A. Yes. 13 or 14.

15 Q. So -- okay. And that's a lot more
16 than 250,000, right?

17 A. Yes.

18 Q. And 250,000, as you told us, was a
19 big deal. What's 4.75 million? A bigger deal? Is
20 that right?

21 A. It's definitely a larger number,
22 yes.

23 Q. Okay. And -- and so if I look at
24 this right -- let's just see. Down a block, the
25 under-16 users who are accessing live stream, lower

1 So you see a message. [REDACTED]

2 [REDACTED] says, "I think the unregistered user
3 experience is only pitched as a safer/age
4 appropriate product in the U.S."

5 Do you see that?

6 A. Yes.

7 Q. Okay. And then [REDACTED] responds:

8 "What I'm not happy is the response
9 from comms - 'yah, we don't know how to address
10 that yet so we just don't talk about it,'" right?

11 A. Yes.

12 Q. On there he's talking about the
13 unregistered user experience, right?

14 A. Yes.

15 Q. And to the best of your knowledge,
16 did TikTok tell users and parents that the
17 unregistered user experience doesn't meet community
18 expectations of an age-appropriate experience?

19 A. No.

20 Q. Okay. I'd like to talk -- switch
21 gears a little bit and take this down and talk
22 about TikTok's safety center and reporting, okay?

23 A. Yes.

24 Q. So first, for the safety center,
25 you would agree that it's important for TikTok to

1 help the users understand how to protect themselves
2 while using the app, right?

3 A. Yes.

4 Q. Okay. And you would also agree
5 that it's important for TikTok to help parents
6 understand how to monitor and protect their
7 children while using TikTok, right?

8 A. Yes.

9 Q. Okay. And it's key that that
10 information be easy to find, right?

11 A. Yes.

12 Q. Okay. And when you started at
13 TikTok, you knew that the safety center was hard to
14 navigate and find, right?

15 A. That's very possible. I don't
16 recall specifically, but that's very possible.

17 Q. Okay. Let's -- one more question
18 relating to reporting in the safety center.

19 It's also important for TikTok to
20 provide users with the ability to report what is
21 sometimes referred to as child sexual abuse
22 material, right?

23 A. Yes.

24 Q. And for the jury, that's what's
25 colloquially known as child pornography, right?

1 A. Yes.

2 Q. And TikTok has a responsibility to
3 report CSAM, or child pornography, to NCMEC, right?

4 A. Yes.

5 Q. To the National Center for Missing
6 and Exploited Children, right?

7 A. Yes.

8 Q. And one way that TikTok finds CSAM
9 and removes it is from user reports, right?

10 A. Yes.

11 Q. Okay. I'm going to pull up
12 Tab FC-5 and mark that as Exhibit 24.

13 (Document marked for identification
14 as Ulucay Exhibit 24.)

15 BY MS. CRAICK:

16 Q. I'm going to represent to you that
17 the metadata that TikTok produced says that it was
18 dated May 13, 2020, and you are the custodian.

19 Do you see that?

20 A. Yes.

21 MS. CRAICK: And, Vince, do we have
22 the PowerPoint here, or do we need to load that in?

23 We do. Excellent. Okay.

24 BY MS. CRAICK:

25 Q. So this is something you put

1 together when you first started at TikTok, right?

2 A. It might be. I need to see the
3 rest of this.

4 Q. Sure. So we can scroll through
5 some of it.

6 Does this ring any bells?

7 A. I'm just not sure if I created this
8 document or if this was [REDACTED].

9 Q. Let's go to the notes for Slide 1.
10 And you can see your name at the bottom there,
11 where you are commenting on it.

12 Do you see that?

13 A. Yes.

14 Q. And there's also some comments from
15 your boss, [REDACTED] right?

16 A. Yes.

17 Q. Okay. And he says, in the second
18 comment -- sorry. Let's start with the first
19 comment.

20 He says, "TikTok's safety videos
21 are superb but never shown."

22 Do you see that?

23 A. Yes.

24 Q. It's important for the safety
25 videos to be shown for them to be effective, right?

1 A. Yes. Absolutely.

2 Q. He also says, in the second
3 comment, "Easy/intuitive reporting button ability?
4 TikTok's is horrible. Not sure others are much
5 better."

6 Do you see that?

7 A. Yes. This -- this is ringing a
8 bell now. What we're doing here is our sort of
9 standard gap analysis. So figuring out where we
10 can be better.

11 Q. Yeah. So you're identifying
12 problems that exist so you can potentially solve
13 them, right?

14 A. Yes.

15 Q. Okay. And he says that if TikTok
16 wants to be serious about safety and give our words
17 some credence, we need to allow people to easily
18 report problems.

19 Do you see that?

20 A. Yes.

21 Q. Were you aware that at this time,
22 in order to report something like child sexual
23 abuse material or child pornography, a user would
24 have to press the share button, and that's where
25 the report feature was?

1 A. Yes, I do recollect that now.

2 Q. Okay. And you would agree, right,
3 that it's not intuitive for a user to press the
4 share button when they come across child
5 pornography, right?

6 A. Yes.

7 Q. And the share button is usually
8 used to send something they find interesting or
9 funny to their friends, for example, right?

10 A. Yes.

11 Q. Okay.

12 MS. CRAICK: Okay. We can pull
13 up -- we can take this down and pull up Tab FC-6
14 and mark this Exhibit 25.

15 (Document marked for identification
16 as Ulucay Exhibit 25.)

17 BY MS. CRAICK:

18 Q. So the metadata indicates that this
19 is May 18, 2020. You were the custodian. And the
20 title is "Competitive Analysis."

21 A. Yes.

22 Q. In the file path.

23 Okay. So we can go back and look
24 at the document. This looks like it's part of the
25 same project as the slideshow we were just looking

1 at; is that right?

2 A. Yes.

3 Q. And do you remember if these are
4 notes that you wrote or someone else on your team
5 wrote?

6 A. Yes. So we actually referenced
7 this earlier as well. This project was an initial
8 competitive analysis that I was asked to do. In
9 reality, so much of the information in this -- I
10 was brand new to the company, so much of it was
11 unvetted, mostly just notes, and, honestly, largely
12 inaccurate.

13 So we should know that going into
14 this, as we review this.

15 Q. Okay. Let's look at some of the
16 comments that you make about the TikTok platform,
17 the one where you are supposed to be the head of
18 minor safety.

19 And it says at the beginning,
20 "Clear/intuitive reporting: TikTok sucks here."

21 Do you see that?

22 A. Yes.

23 Q. It also says, "Behavioral design,
24 cognitive design/nudges to encourage right
25 behavior/discourage bad ones. Instagram has

1 re-think. TikTok has nothing but launching
2 something. Not sure about others."

3 Do you see that?

4 A. Yes.

5 Q. And one way that TikTok can make
6 the platform safer is engaging in design tactics in
7 order to encourage good behavior and discourage bad
8 ones, right?

9 A. Yes.

10 Q. And that's something, like maybe a
11 popup comes up when someone is doing something
12 risky or dangerous, encouraging them to think
13 twice, right?

14 A. Yeah. We call those just-in-time
15 notices.

16 Q. Okay. And if we scroll down to the
17 second page, under the easy reporting, you'll see
18 here, it says, "Reporting is buried under the
19 'share' button."

20 Do you see that?

21 A. Yes.

22 Q. And that's what we were talking
23 about earlier, where, in order to report child
24 pornography, users would have to press the share
25 button, right?

1 A. Yep.

2 Q. Okay. It also discusses parental
3 controls.

4 Do you see that?

5 A. Yes.

6 Q. And then it says -- sorry.

7 MS. CRAICK: Vince, could you back
8 out?

9 Can you scroll down to the next
10 page.

11 Okay. We can move on from this
12 document.

13 Let's pull up FC-7 and mark that as
14 Exhibit 26.

15 (Document marked for identification
16 as Ulucay Exhibit 26.)

17 BY MS. CRAICK:

18 Q. Okay. So, again, metadata shows
19 that this is May 14, 2020, you are the custodian,
20 and you can see the title is, "[Minor Safety/Bay
21 Hub] Safety Center Feedback Template."

22 Do you see that?

23 A. Yes.

24 Q. And this is something you worked on
25 in the regular course of your job at TikTok, right?

1 A. I don't recall this -- this work or
2 this doc.

3 Q. Okay. Minor safety, that certainly
4 was your role at TikTok, correct?

5 A. Oh, yes. Okay. I was thinking
6 that this was just safety center feedback.

7 Okay. Yeah. I don't remember this
8 document, but yes.

9 Q. Okay. And you have no reason to
10 doubt if TikTok says it was in your custodial file,
11 right?

12 A. No.

13 Q. Okay. I mean you have no reason to
14 believe it was altered from how it was in your
15 file, right?

16 A. No.

17 Q. Okay. So let's look at the third
18 bullet point here, "The current Safety Center."

19 It says:

20 "The current Safety Center is not
21 sufficient to meet the needs of our users for
22 several reasons.

23 "1, the content is not organized in
24 a structured or digestible way that provides real
25 value to the user.

1 "2, the information architecture is
2 not scalable to accommodate our growing safety
3 offerings.

4 And "3, the tone, design and in-app
5 placement does not resonate with our key
6 demographics and related parties (re: parents)."

7 Do you see that?

8 A. Yes. This is a part of another gap
9 analysis that we were doing, to identify areas we
10 can make improvements.

11 Q. And you're identifying problems
12 here with the safety center, right?

13 A. Yes.

14 Q. Anyway, you concluded that it's not
15 sufficient to meet the needs of your users at this
16 time, right?

17 A. Yes.

18 Q. Okay. Let's scroll down to the
19 next page.

20 So you see the bullet point that
21 says, "What information/topics/issues do you wish
22 were present in the Safety Center that are not?"

23 A. Yes.

24 Q. It says, "It feels like the 'Online
25 Safety Center'" -- at the bottom -- "is actually

1 the main hub of information but it's so buried, I
2 thought we just didn't have any of this information
3 after ten minutes of searching around."

4 Do you see that?

5 A. Yes.

6 Q. And that's a problem, right,
7 because it's not reasonable to expect people to
8 spend ten minutes looking to see if TikTok has
9 information on safety, right?

10 A. Yeah. This is a gap we've
11 identified.

12 Q. Okay. It says, "I also think
13 pointing users to nonprofit groups in harassment
14 and bullying is inappropriate. It really isn't a
15 16-year-old's responsibility to reach out to a
16 nonprofit to learn more. We have an obligation to
17 be a lot more on top of this and own our end of the
18 bargain," right?

19 A. Yes.

20 Q. And that's TikTok's end of the
21 bargain, right?

22 A. Yes.

23 Q. Okay. And TikTok, as we talked
24 about earlier, has an obligation to protect kids on
25 its platform, right?

1 A. Yes.

2 Q. It also says, "The additional steps
3 to link to our 'other' help center is awkward and
4 really buries information."

5 Do you see that?

6 A. Yes.

7 MS. CRAICK: And then if you keep
8 scrolling down. Keep scrolling down.

9 Okay. And blow that up.

10 BY MS. CRAICK:

11 Q. You see it says, "No company can
12 reasonably expect minors to read through Help
13 Centers. In my dream world, we would bake
14 important nudges into the product."

15 Do you see that?

16 A. Yes. We ended up building out
17 those nudges into the product, for a number of
18 things.

19 Q. And you agree that no company can
20 reasonably expect minors to read through the help
21 center, right?

22 A. It's the last thing that a teen
23 would want to read.

24 Q. Okay. All right. I'm going to
25 switch gears. Let me know if you need a break at

1 CERTIFICATE

2
3
4 I HEREBY CERTIFY that the witness
5 was duly sworn by me and that the deposition is a
6 true record of the testimony given by the witness.

7 It was requested before completion
8 of the deposition that the witness, AMY ULUCAY
9 (CLASSEN), have the opportunity to read and sign
10 the deposition transcript.

11 <%31569,Signature%>

12 MICHELLE L. RIDGWAY,
13 Certified Shorthand Reporter,
14 (CA-CSR # 14592)
15 (Certified Court Reporter
16 (NJ-CCR # XI02126)
17 Registered Professional Reporter,
18 Certified Realtime Reporter
19 and Notary Public
20 Dated: February 7, 2025
21
22
23
24
25

26 (The foregoing certification of
27 this transcript does not apply to any reproduction
28 of the same by any means, unless under the direct
29 control and/or supervision of the certifying
30 reporter.)

Exhibit 683B

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

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

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

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

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

15 This Document Relates to:)
16)

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

Monday, February 10, 2025

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Continuing Remote Video-Recorded Oral
Deposition of AMY ULUCAY (CLASSEN), VOLUME 2,
held remotely at the location of the witness,
commencing at 10:01 a.m. EST on the above
date, before Michael E. Miller, Fellow of the
Academy of Professional Reporters, Certified
Court Reporter, Registered Diplomate
Reporter, Certified Realtime Reporter and
California CSR #13649.

GOLKOW - VERITEXT
877.370.DEPS | fax 917.591.5672
deps@golkow.com

1 The court reporter today is
2 Mike Miller, California CSR No. 13649,
3 and will now swear in the witness.

4 -----

5 AMY ULUCAY (CLASSEN),
6 having been previously duly sworn,
7 testified as follows:

8 -----

9 EXAMINATION

10 -----

11 BY MS. CRAICK:

12 Q. Good morning. Thank you for
13 coming back today.

14 A. Good morning.

15 Q. Where are you today?

16 A. I'm at my house. Do you need
17 my address?

18 Q. Yes, please.

19 A. It's [REDACTED]

20 [REDACTED]
21 Q. Thank you.

22 And you understand you're still
23 under oath, correct?

24 A. Yes.

25 Q. And is there any reason why you

1 cannot give truthful testimony today?

2 A. No.

3 Q. Did you speak with your counsel
4 after we finished our deposition on
5 Wednesday?

6 A. We just exchanged texts about
7 the logistics of this meeting.

8 Q. Okay. Did you talk about your
9 testimony at all?

10 A. No.

11 Q. Okay. And did you rehearse
12 anything about what you were going to say
13 today?

14 A. No.

15 Q. After we left off, or when we
16 left off, we were discussing child sexual
17 abuse material or child pornography and
18 grooming.

19 Do you recall that?

20 A. I will need a refresher, yeah.

21 Q. Okay. I learned part of your
22 job in minor safety at TikTok was trying to
23 address child sexual abuse material, child
24 pornography and grooming on TikTok, right?

25 A. Yes.

1 Q. Okay. I'm going to pull up Tab
2 FC10 and mark that as Exhibit 30.

3 (Whereupon, Ulucay Exhibit 30,
4 Addressing Minor Safety Notes,
5 TIKTOK3047MDL-042-LARK-00237494 -
6 TIKTOK3047MDL-042-LARK-00237494.00018,
7 was marked for identification.)

8 BY MS. CRAICK:

9 Q. Let me know when you see that.

10 A. Yes, I can see it.

11 Q. Okay. And I will represent to
12 you that this document, according to the
13 metadata, is dated June 25th, 2020.

14 Do you see that?

15 A. Yes.

16 Q. And it says that it was in your
17 files. You're a custodian.

18 Do you see that?

19 A. Yes.

20 Q. Okay. So the title of this
21 document is addressing minor safety notes.

22 Do you see that?

23 A. Yes.

24 Q. And is this something you put
25 together in the course of your job at TikTok?

1 A. Yes, I think so.

2 Q. Okay. And this was part of
3 your regular work at TikTok, right?

4 A. Yes.

5 Q. And you have no reason to
6 believe it was altered from its original form
7 in your file, right?

8 A. No.

9 Q. Okay. So at the beginning it
10 says that the primary purpose of this
11 document is to assess the current landscape
12 of Minor Safety projects across ByteDance and
13 to increase transparency into
14 cross-functional initiatives.

15 Do you see that?

16 A. Yes.

17 Q. And ByteDance is the company
18 that runs TikTok, right?

19 A. Yes.

20 MS. FOURNIER: Object to form.

21 BY MS. CRAICK:

22 Q. And then what is
23 cross-functional initiatives?

24 A. Meaning projects that are
25 happening across the company that may not be

1 centralized out of, for instance, my team,
2 right? So the product teams could have
3 launched something, the engineers could have
4 launched something that could have impacted
5 or been beneficial for minor safety but
6 didn't happen, you know, from us launching
7 it, for instance. But there was already
8 ongoing work, of course, before I got to the
9 company.

10 Q. Okay. So then if we scroll
11 down a bit, in bold it says: Child Sexual
12 Exploitation Must Be Addressed to Ensure the
13 Safety of Minors.

14 Do you see that?

15 A. Yes.

16 Q. And can you read the first
17 bullet point under that heading?

18 A. A journalist is twice as likely
19 to find child sexual exploitation on TikTok
20 than our competitors.

21 MS. CRAICK: Okay. And, Vince,
22 can you underline that?

23 BY MS. CRAICK:

24 Q. So by the next bullet point it
25 says: That said, we have significantly less

1 child sexual abuse material on our platform
2 than our competitors, meaning our biggest
3 problems are predation, grooming and
4 facilitating access to child sexual abuse
5 material.

6 Do you see that?

7 A. Yes.

8 Q. So TikTok has -- at least at
9 this time in 2020, has significantly less
10 child pornography on it than Instagram,
11 Snapchat, Facebook, YouTube, right? That's
12 what this is saying?

13 A. Yes, uh-huh.

14 Q. But the biggest problems for
15 TikTok in June 2020 are predation, grooming
16 and facilitating access to child sexual abuse
17 material, right?

18 A. Yeah, the biggest problems
19 within this competitive analysis for minor
20 safety.

21 Q. Okay. So let's talk about some
22 of the other things in this document.

23 I believe we talked about, on
24 Wednesday, that you understand TikTok has an
25 obligation to report child pornography to

1 NCMEC or the National Center for Missing and
2 Exploited Children, right?

3 A. Yes.

4 Q. And on the second page, it
5 says: We are underreporting child sexual
6 abuse material because we're not tagging
7 minor nudity, slash, sexual activity.

8 Do you see that?

9 A. Yes.

10 Q. Okay. And it says there's
11 another issue: We do not have a workflow for
12 removing known sex offenders that are
13 reported to us by users, police or the media.

14 Right?

15 A. Yes.

16 Q. Okay. And then let's look at
17 page 4.

18 Here in the middle of the page
19 it says: We don't have any models to detect
20 high-risk children who might be at a higher
21 risk of predation.

22 Do you see that?

23 A. Yes.

24 Q. What is a high-risk child?

25 A. I don't know what I was

1 CERTIFICATE

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

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

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

15 <%20911,Signature%>

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

20 Dated: February 11, 2025
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