

**AMENDED
Exhibit 686**

**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

Reagan Maher 2022-04-28 22:36:53

Reagan Maher和Sheila Nagaraj的会话记录

Forwarded

Reagan Maher 2022-04-28 17:01:29

https://bytedance.feishu.cn/docx/doxcnb2yJfVByaJF5jJFrHIDDMh?from=auth_notice&hash=cdc3210fdf27d8791dacff156b7c44e6

Reagan Maher 2022-04-28 17:01:55

https://bytedance.feishu.cn/docx/doxcnnh1L5720FyPqON9yrui7kd?from=auth_notice&hash=4408f0b293218ef15b5c3daec197b96b

Reagan Maher 2022-04-28 22:37:14

hi Sai, sharing the Project Meramec docs with you as a starting point for problems & solutions

Reagan Maher 2022-04-28 22:38:19

the first is a narrative doc - easy to read, very comprehensive

Reagan Maher 2022-04-28 22:38:37

the second is a chart that has some potential solutions for the problems identified

 Sai Gaonkar

Reagan Maher 2022-04-28 23:26:03

 Sai Gaonkar

Sai Gaonkar 2022-04-28 23:36:38

thanks. i was going to put some time on your calendar :) thanks for setting it on calendar

 Reagan Maher

Sai Gaonkar 2022-04-29 18:11:31

i will summarize the points in a 1-2 pager and send it your way to think through. i am sure you will already have great data to supplement it!

 Reagan Maher

Reagan Maher 2022-04-29 18:11:49

happy to support and very grateful to have you on the team

 Sai Gaonkar

Sai Gaonkar 2022-04-29 18:12:48

the timing is great! product never takes safety as a priority till things blow up. no amount of complaining helps!

 Reagan Maher

Reagan Maher 2022-04-29 18:13:41

It's been a tough week. I wrote those meramec docs 2 months ago and poured my whole life into them during Jan/Feb. Not getting traction was so frustrating

Reagan Maher 2022-04-29 18:17:58

I don't see the meeting I set on the calendar anymore -- did I actually do it? LOL

Sai Gaonkar 2022-04-29 18:18:18

haha. i think you might have put the follwing monday by mistake

 Reagan Maher

Sai Gaonkar 2022-04-29 18:19:12

lets try something later on monday so i can hand you over the initial thoughts

Reagan Maher 2022-04-29 18:19:18

re-set for tuesday

Sai Gaonkar 2022-04-29 18:19:23

cool. thanks

Sai Gaonkar 2022-04-29 18:20:04

i am also going to try to get hold of chaofeng on monday night but they might have that labor day holiday. but i think i already knwo their ideas

 Reagan Maher

looking forward to our chat. will look for your help to take our thoughts and make it more executive friendly lol

 Reagan Maher

Reagan Maher 2022-05-03 18:07:04

hey Sai, I'm not sure the wi-fi where I am right now will work very well. I'll try to join the meeting and we'll see how it is

Sai Gaonkar 2022-05-03 19:13:47

i shortened the doc and put the hyperlink in there. If you want to add more material please add to that hyperlink. That way whoever wants to deep dive can look at the link [How does this create good growth?](<https://bytedance.feishu.cn/docx/doxcnYujcluf2oxieE5YJGets3g>) We want that 1-2 pager pretty crisp

Sai Gaonkar 2022-05-04 16:37:20

Hi Reagan. In that doc we somewhere have to connect the dots on ecosystem growth. To say that id ads is supposed to be integrated in the near future in Livestream this will be a challenge with the current quality of content. I think we had a line around that yesterday but might have been dropped. Without that Product development team might not take this point that much seriously "We have inadvertently built a business model that generates revenue for our company and our creators from violative content". The logic is gifting is personal but when ads are involved brands dont want to associate with Cringe. with gifting its between the creator and user and TT gets a cut of that revenue.

Reagan Maher 2022-05-04 16:54:02

I added a GBS stakeholder to sign off & included the idea in the considerations for Problem 1 here - Business needs to align on whether this transactional borderline sexual content on TikTok Live helps or hurts the business and whether it is a safety or quality issue. How does this content fit business goals? Brand, PR, GR, GBS (advertising)

Reagan Maher 2022-05-04 16:56:45

Title:

Text:

we still need more details too in some of the bullet points like this one - we need to include details in the bullet point about what the projects are, what / how much they'll solve, and when they will launch. I think you added the doc link which is great but we want to ensure executives don't actually have to click on them & read them unless absolutely necessary

- There are recidivist based projects underway which will stop re-sharing of info based on device id's etc. Also, image patterns have been used to track similar content. [[US Safety] ANSA Recidivist Recall Strategies Project Plan](<https://bytedance.feishu.cn/docx/doxcnztcu6Yt1BvlmZG0DSm2r7e>)

Reagan Maher 2022-05-04 16:58:47

POST

Title:

Text:

more specifics for some of the recommendations would be beneficial too like this one - what would we consider violative accounts? how do we figure out thresholds? are we suggesting we remove all comment & gifting features from any account that's violated one policy title? What about appeals?

- Action on violative user accounts. Remove comment/gifting abilities

Sai Gaonkar 2022-05-04 16:59:02

Ok. Will add a couple of summary lines in there. policy development is slightly delayed on that project. but it is what it is

Sai Gaonkar 2022-05-04 17:29:17

let me know if you have a few minutes to discuss now. Wanted to brainstorm on some of the points from Ran's 1:1 today

sure

System Message 2022-05-04 17:37:40

Sai Gaonkar 2022-05-04 19:06:18

i have added the details into the table. feel free to edit the asks

 Reagan Maher

Sai Gaonkar 2022-05-04 21:12:42

POST

Title:

Text:

now that the table form looks more clean and the ask are to the point i have added the 2 hyperlinks in there

- [Problems & Recommended Solutions]

(<https://bytedance.feishu.cn/docx/doxcn0HzmWZWg09EDGu2ZkgErry>)

- [Summarized existing Projects Link]

(<https://bytedance.feishu.cn/docx/doxcnsXmGkM1LkXMssMd4R4EfON>)

Sai Gaonkar 2022-05-04 21:13:10

planning to remove your bottom content so its more concise. If they want deep dive they will refer to the links

DOCUMENT METADATA

Bates Number: TIKTOK3047MDL-045-LARK-00381289-TIKTOK3047MDL-045-LARK-00381294

BEGATTACH: TIKTOK3047MDL-045-LARK-00381289

ENDATTACH: TIKTOK3047MDL-045-LARK-00381303

Attachment Count: 3

PRODVOL: MDL-045

Custodian: MAHER, REAGAN

File Path: /TIKTOK3047MDL-045-LARK-00381289.PDF

Confidentiality Designation:

HASHVALUE: 15577B718F0E5EFF39CFC92F76E0B9BF

DocType:

Author:

Create Date: 4/28/2022 12:00 AM

Last Modified Date: 4/28/2022 12:00 AM

LAST MODIFIED BY:

TRACK CHANGES:

COMMENTS:

HASHIDDENATA:

Filename: TIKTOK3047MDL-045-LARK-00381289.PDF

Title:

DOEXT: .HTML

Email From:

Email To:

Email CC:

Email BCC:

Received Date: 12/31/9999 7:00 PM

Sent Date: 12/31/9999 7:00 PM

TIMEZONE:

Subject:

Case 4:22-md-03047-YGR

Document 2755-49

Filed 02/20/26

Page 9 of 9

THREADID:

REDACTIONS:

REDACTION TYPE: