

AMENDED Exhibit 691

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

-Behavioral design, cognitive design/nudges to encourage right behaviors/discourage bad ones: IG has re-think. TT has nothing but launching something. Not sure about others.

-Clear/intuitive reporting: TT sucks here.

-Age-based features: TT has now some of this, not sure about others.

-Family pairing

-[maybe highlight a few other tools; TT and IG have a lot and the ability to customize -- though frankly i'm not sure if these are used or effective]

-In-app educational videos [we have amazing educational safety videos but never show them; so could point that out].

For external, we can note:

-Media literacy: what others do; TT does nothing yet, is producing some videos that will come out later this summer

-Highlight the other external efforts of companies, of which TT has none. These should be "red" for us and indicate areas we are behind.

If we were in the office we could just white board this out. We can have several categories or sheets of what we are comparing if these 2 categories are not enough.

1) Snapchat, 2) YouTube, 3) Instagram, and last / almost not relevant are 4) Facebook and 5) Twitter.

	TikTok	Snapchat	YouTube	Instagram	Facebook	
Easy to learn policies	Youth Portal lacks information and isn't designed for a minor audience. Safety Center nesting is unclear and useful information is outdated and buried. Safety Videos are a great initiative but they are not surfaced in the app.					
Tools to control data and	Delete historical data					

consent	Personalized data retention Consent for personalized ads, data sales, third party tracking, and unsubscribe from marketing.					
Tools to control visibility and privacy	Accounts can be private or not-recommended to other users.					
Interaction controls	Individual controls on who can comment and what they can say, direct messaging, video download, liking and duet/reach controls.					
Easy reporting	Reporting is buried under the 'share' button					
Parental controls	Family pairing option with parental controls for screen time, followers, comments, duet, and follow restrictions.					
Age-gating	Download controls, live stream restrictions, and inability to direct message. Under-13 experience with with curated content and no ability to upload or interact with others.					

Harassment/Bullying	Anti-bullying hub is buried. Ability to create personalized comment filters leave it to users prevent mean comments.					
Misinformation/Election Integrity	Fact-checkers					
Screen time management	Manage time spent on app, view metrics, remind users to take a break					
Content Restrictions	Restricted modes, 18+ content, explicit song filter, photosensitivity/epilepsy filter					

DOCUMENT METADATA

Bates Number: TIKTOK3047MDL-018-00361102-TIKTOK3047MDL-018-00361104

BEGATTACH: TIKTOK3047MDL-018-00361102

ENDATTACH: TIKTOK3047MDL-018-00361104

Attachment Count: 0

PRODVOL: TIKTOK3047MDL-018

Custodian: AMY CLASSEN

File Path: /COMPETITIVE
ANALYSIS_1ZGJFD78VYO8_EUYTDM8MA21XYLEPGIDSTSS2OONWF2Y.DOCX

Confidentiality Designation: CONFIDENTIAL

HASHVALUE: 31AB0630956D75AC1B7A4F9397D8EE25

DocType:

Author: [REDACTED] BYTEDANCE.COM

Create Date: 5/18/2020 12:00 AM

Last Modified Date: 5/18/2020 12:00 AM

LAST MODIFIED BY:

TRACK CHANGES:

COMMENTS:

HASHIDDENATA:

Filename: COMPETITIVE
ANALYSIS_1ZGJFD78VYO8_EUYTDM8MA21XYLEPGIDSTSS2OONWF2Y.DOCX

Title:

DOCEXT: DOCX

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:

Case 4:22-md-03047-YGR

Document 2877-79

Filed 03/25/26

Page 6 of 6

Subject:

THREADID:

REDACTIONS:

REDACTION TYPE: