

## PROPOSED CLASS ACTION SETTLEMENT

### NOTICE OF PROPOSED SETTLEMENT AND SETTLEMENT APPROVAL HEARING

#### DID YOU USE THE TIKTOK PLATFORM IN CANADA ON OR BEFORE OCTOBER 28, 2021?

#### THIS NOTICE MAY AFFECT YOUR LEGAL RIGHTS

A class action settlement has been reached in *Lisa Thomas v. ByteDance Ltd*, SCBC S-209073 and *A.C. an infant by her Litigation Guardian Robert Andrew Cronk v. musical.ly Inc.*, SCBC S-193384. The action was certified by the Supreme Court of British Columbia.

The settlement is a compromise and is not an admission of liability or wrongdoing or fault by any of the defendants. The proposed settlement is subject to Court approval.

The class action has been certified on behalf of all physical persons in Canada (including their estates, executors, or personal representatives) who used the TikTok platform on or before October 28, 2021, and an included subclass of all physical persons in Canada (including their estates, executors, or personal representatives) who used the TikTok platform at any time on or before October 28, 2021 while under the age of majority in their province.

For the payment of \$2,000,000 plus \$26,629 cost reimbursement by TikTok Inc and TikTok Pte Ltd, the Class will release the defendants from all claims. The settlement funds, after payment of Class Counsel fees, expenses, and any honourarium to the plaintiffs, will be donated to the Law Foundation of British Columbia, Canadian Centre for Child Protection, Kids Help Phone, and Boys & Girls Clubs Canada.

The representative plaintiffs have entered into a contingency fee agreement with class counsel providing for a maximum fee of 25%. Class Counsel will seek approval of their fees at or after the settlement approval hearing. The court will determine the amount to be paid to class counsel for legal fees and disbursements.

You are automatically included in the Class, and will be bound by the settlement if approved by the Court, unless you opt out. If you do not want to be part of the lawsuit, you must opt out of the proceeding by delivering an opt out form to Class Counsel by no later than **January 17, 2022**.

For members of the Class that wish to object to the settlement, Distribution Protocol, Class Counsel fees or the honouraria to the plaintiff, you must notify Class Counsel no later than **January 14, 2022**, in the manner set out in the long form notice.

Class Counsel are Hammerco Lawyers LLP, Mathew P Good Law Corporation, and Slater Vecchio LLP. More information on the settlement (including the opt-out form, and Settlement Agreement) is available at <https://www.slatervechio.com/tiktok-class-action>.

This notice has been authorized by the Supreme Court of British Columbia.