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6 *Lead Counsel for the Direct Purchaser Class*

7
8 UNITED STATES DISTRICT COURT

9
10 NORTHERN DISTRICT OF CALIFORNIA

11 **JANE DOE**, individually and on behalf of all others
similarly situated,

12 *Plaintiff,*

13 v.

14 **YOUTUBE, INC.,**

15 *Defendant.*

Civil Case No. 4:20-CV-07493-YGR

**DECLARATION OF CLASS
REPRESENTATIVE JANE DOE IN
SUPPORT OF PLAINTIFF'S MOTION
FOR ATTORNEYS' FEES,
REIMBURSEMENT OF COSTS, AND
SERVICE AWARDS**

1 I, [REDACTED], declare and state as follows:

2 1. I am the plaintiff in this case. I submit this declaration in support of final approval of the
3 Settlement of this Action for \$4,702,544.80. I also submit this declaration in support of Class Counsel's
4 application for an award of attorneys' fees of \$1,416,163.44, and expenses of \$41,234.97 of the
5 Settlement Fund, and my request for a Class Representative Service Award of \$20,000 for the
6 significant time, personal risk, and effort invested in representing the Settlement Class. I have personal
7 knowledge of the statements herein, and if called as a witness, I would completely testify thereto.

8 2. I worked as a first-level Content Moderator, reviewing content for YouTube from
9 approximately [REDACTED]. I was employed at [REDACTED]
10 [REDACTED] at an office located at [REDACTED]. As a Content Moderator, I
11 was required to review hundreds of graphic and disturbing videos each week and ascertain which
12 videos should be removed from YouTube's platform. YouTube created and continually revised
13 hundreds of rules that Content Moderators must use to determine whether flagged content violated its
14 policies.

15 3. During the course of my employment as a Content Moderator, I was exposed to graphic
16 and objectionable content, including but not limited to graphic violence, sexual assault, and child
17 pornography. Resulting from my work as a Content Moderator, I developed severe psychological
18 trauma, including depression and symptoms associated with anxiety and PTSD. My symptoms
19 associated with PTSD were caused by exposure to harmful content and can be easily triggered by
20 witnessing abuse; watching the news or seeing violence on television; hearing loud noises like
21 gunshots, fireworks, cars backfiring, or objects falling; seeing ISIS members or paraphernalia; and
22 seeing racially discordant posts sowing political dissension in America. Additionally, I have trouble
23 sleeping, and when I am able to sleep, I have horrific nightmares. I often suffer from severe and
24

1 debilitating panic attacks. I have lost many friends because of my anxiety being around people. I also
2 experience difficulty interacting and being around kids, and now I am scared to have children.

3 4. On September 21, 2020, I commenced this class action lawsuit in the Superior Court of
4 the State of California, County of San Mateo against YouTube, Inc. in an action styled *Doe, v.*
5 *YouTube, Inc.*, Civil Action No. 20-CIV-04023 (Sup. Ct. CA), alleging causes of action against
6 YouTube, Inc. for (1) negligence (abnormally dangerous activity); (2) negligence (negligent exercise of
7 retained control); (3) negligence (negligent provision of unsafe equipment); (4) California Unfair
8 Competition Law; and (5) California Unfair Competition Law (as “Special Employer”). This Action
9 sought relief from the dangers of psychological trauma resulting from exposure to graphic and
10 objectionable content on YouTube’s platform and their failure to provide a safe workplace for the
11 thousands of contractors that scrub YouTube’s platform of disturbing content.

12 5. I became a plaintiff in this Action to serve the interests of the entire Settlement Class. I
13 believe that I have fulfilled that obligation. After commencement of this Action, I agreed to remain a
14 Class representative after YouTube removed this litigation to the United States District Court for the
15 Northern District of California in the action styled *Doe v. YouTube, Inc.* Case No. 4:20-cv-7493-YGR
16 (N.D. Cal.).

17 6. I became a named plaintiff in this Action despite my concerns over retaliation from my
18 employer, which is a vendor for Defendant. Retaliation could have cost me my primary source of
19 income. I understand that another class representative is alleged to have been terminated from her
20 employment for bringing similar litigation in another case, and as such I submit this Declaration to be
21 presented before the Court with information identifying me redacted.

22 7. The following summarizes the various tasks I performed to assist counsel in the
23 prosecution of this lawsuit and an estimate of the number of hours devoted to each task. Throughout
24 this litigation, I maintained contact with my attorneys in order to monitor the case, provide input, and

1 fulfill various duties on behalf of the Class, including but not limited to multiple consultations with
2 counsel concerning informal discovery and consultations related to the settlements in this action.

3 8. In the early stages of this matter and later, I was actively involved in representation of
4 the Settlement Class by (a) engaging in regular consultations with my attorneys through written
5 communications, telephone calls, and several in-person meetings; (b) providing input regarding
6 litigation and settlement strategy; (c) producing informal discovery; (d) participating in a mediation
7 session; (e) monitoring media coverage for the case and providing my attorneys with documentation
8 and helpful research; (f) discussing the parameters for an appropriate resolution of this Action and
9 ultimately agreeing to the Settlement, among other things. I estimate that I spent over 50 hours in
10 fulfilling these obligations.

11 9. I authorized my attorneys to enter into the proposed Settlement. I discussed with my
12 attorneys the substantial benefits to the Settlement Class and weighed them against the significant risks
13 and uncertainties associated with continuing this litigation. I strongly believe that the Settlement
14 represents a highly favorable recovery. This Settlement is in the best interest of the Settlement Class
15 because it provides meaningful monetary compensation for each Settlement Class Member for their
16 own exposure to traumatic material and resulting injuries, and the Settlement also provides for
17 Settlement Class Members to obtain treatment for the harm they endured. The Settlement further
18 provides for non-monetary compensation that I believe is of great benefit to the Settlement Class.

19 10. This Settlement would not have been possible without the diligent efforts of my
20 attorneys, who aggressively and successfully litigated this Action. I am familiar with the terms of the
21 proposed Settlement. Accordingly, I believe that the Settlement is ultimately fair, reasonable, and
22 adequate, and thus, should be approved by the Court.
23
24

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5.1, I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/s/) within this e-filed document.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 8, 2023.

By: /s/ Steven N. Williams
Steven N. Williams

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