

EXHIBIT A

Claim Number: {\var:claim_number}

SUMMARY NOTICE OF PROPOSED CLASS ACTION

Doe v. YouTube, Inc.

United States District Court for the Northern District of California

Case No. 4:20-cv-7493

You have been identified as a current or former Content Moderator who performed work for YouTube, Inc. (“YouTube”) in the United States as an employee or subcontractor of one or more of YouTube’s Vendors between January 1, 2016 and September 30, 2022. There is a proposed settlement of a class action filed against YouTube asserting claims related to injuries allegedly caused by viewing graphic and objectionable content while performing content moderation services for YouTube’s Vendors.

The United States District Court for the Northern District of California ordered that this notice be sent to certain current and former content moderators to notify them of a proposed settlement of a class action lawsuit. This notice is not a solicitation from a lawyer, and you are not being sued.

The settlement includes all claims asserted by the Plaintiff in the lawsuit on behalf of herself and the proposed Class. The settlement provides for payment of \$4,269,070 by YouTube, from which each Class Member will receive an automatic payment. YouTube also will implement business practice enhancements addressing the workplace practices challenged in this action, including requiring all YouTube Vendors to implement interventions to promote the wellness of Content Moderators and providing all Content Moderators in the United States with access to YouTube’s anonymous whistleblower hotline to report any violation by YouTube or a YouTube Vendor.

If you are a Class Member, you have several options. You may:

- a. Participate in the settlement and receive the benefits of the settlement, in which case no action is required by you at this time;
- b. Object to the settlement by filing and serving an objection by December 29, 2022; or
- c. Request to be excluded from the settlement by submitting a request to be excluded by December 29, 2022.

Each of these options is discussed in more detail in the full-length class notice, which you can read at www.ContentModeratorYTSettlement.com. You can request that a copy of the full-length class notice be mailed to you by contacting the Settlement Administrator by email at admin@contentmoderatorYTsettlement.com or by mail at Doe v. YouTube Settlement Administrator, P.O. Box 301132, Los Angeles, CA 90030-1132.

PLEASE DO NOT CONTACT THE COURT.

EXHIBIT B

Doe v. YouTube Settlement Administrator
P.O. Box 301132
Los Angeles, CA 90030-1132

LEGAL NOTICE

See other side for details

YOD

«3of9 Barcode»

«BARCODE»

Postal Service: Please do not mark barcode

YOD «Claim Number»

«FIRST1» «LAST1»

«ADDRESS LINE 2» «ADDRESS LINE 1»

«CITY», «STATE»«PROVINCE» «POSTALCODE»

«COUNTRY»

SUMMARY NOTICE OF PROPOSED CLASS ACTION

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United States District Court for the Northern District of California

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If you are a Class Member, you have several options. You may:

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Each of these options is discussed in more detail in the full-length class notice, which you can read at www.ContentModeratorYTSettlement.com. You can request that a copy of the full-length class notice be mailed to you by contacting the Settlement Administrator by email at admin@contentmoderatorYTsettlement.com or by mail at *Doe v. YouTube* Settlement Administrator, P.O. Box 301132, Los Angeles, CA 90030-1132.

PLEASE DO NOT CONTACT THE COURT.

EXHIBIT C

NOTICE OF PROPOSED CLASS ACTION

Doe v. YouTube, Inc.
United States District Court for the Northern District of California
Case No. 4:20-cv-7493

You have been identified as a current or former Content Moderator who performed work for YouTube, Inc. (“YouTube”) in the United States as an employee or subcontractor of one or more of YouTube’s Vendors between January 1, 2016 and September 30, 2022. There is a proposed settlement of a class action filed against YouTube asserting claims related to injuries allegedly caused by viewing graphic and objectionable content while performing content moderation services for YouTube’s Vendors.

The United States District Court for the Northern District of California ordered that this notice be sent to certain current and former content moderators to notify them of a proposed settlement of a class action lawsuit (the “Action”). This notice is not a solicitation from a lawyer, and you are not being sued.

Your legal rights are affected by the settlement, so please read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS CLASS ACTION LAWSUIT	
EXCLUDE YOURSELF	If you exclude yourself, you WILL NOT receive payment. You WILL have the option to file your own lawsuit regarding the claims resolved by this settlement or those that are sufficiently related. You WILL NOT be bound by the release explained in this notice below.
OBJECT	If you do not exclude yourself, you may object to the settlement. If you object, you should write to the Court explaining why you do not agree with the settlement. The Court may or may not agree with your objection.
DO NOTHING	You do not need to do anything to receive money. Money will be automatically paid to you if you do not request exclusion. You WILL give up any rights to sue YouTube for the claims made in this Lawsuit or any that are sufficiently related. You WILL be bound by the release.

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1. What is this lawsuit about?

Plaintiff Jane Doe (“Plaintiff”) brought this action on behalf of current and former Content Moderators who performed work in the United States as an employee or subcontractor of a YouTube Vendor between January 1, 2016, to the date of Preliminary Approval (the “Class”). For purposes of this settlement, “Content Moderator” means an individual who works in a group whose principal responsibility is to review user-generated content uploaded to YouTube to determine whether such material violates YouTube’s Community Guidelines. “YouTube Vendor” means a vendor (a) with whom YouTube has contracted to provide Content Moderator services to YouTube in the United States; and (b) who either (i) directly employed an individual as a Content Moderator; or (ii) subcontracted with an individual to provide services as a Content Moderator. “YouTube Vendor” also means any subcontractor of a YouTube Vendor who has contracted to provide Content Moderator Services to YouTube in the United States and who (y) directly employed an individual as a Content Moderator; or (z) subcontracted with an individual to provide services as a Content Moderator.

Plaintiff alleges that YouTube failed to provide a safe work environment for Content Moderators, many of whom view and flag for removal graphic and objectionable material in order to make YouTube safe for the public. Plaintiff alleges that, as a result of repeated viewing of that material, Class Members were subjected to an increased risk of suffering trauma-related injuries.

The settlement includes all claims asserted by Plaintiff in the lawsuit on behalf of herself and the proposed Class. As detailed below, the settlement provides for payment of \$4,269,070 by YouTube, which will be used to pay all settlement costs, including settlement administration costs, any attorneys’ fees and expenses awarded to class counsel, and a “Per Capita Payment” to each Class Member. YouTube also will implement business practice enhancements addressing the workplace practices challenged in this action, including requiring all YouTube Vendors to implement interventions to promote the wellness of Content Moderators and providing all Content Moderators in the United States with access to YouTube’s anonymous whistleblower hotline to report any violation by YouTube or a YouTube Vendor.

2. What is a class action?

In a class action lawsuit, one or more people called “Class Representatives” (in this case, Plaintiff Jane Doe) sue on behalf of other people (“Class Members”) who allegedly have similar claims. If a court approves of the case proceeding as a “class action,” that court decides the lawsuit for all Class Members.

In this case, the Class Representative and YouTube reached a settlement, subject to Court approval, to agree to a class action for purposes of settlement. The Court certified the case as a class action solely for purposes of deciding whether to approve the settlement. If the settlement is not approved by the Court, the Class Members will not get the benefits of this settlement, and the Plaintiff will go back to court to continue her case.

3. Why is there a settlement?

The settlement was reached through extensive arm’s-length negotiations between experienced attorneys for Plaintiff and for YouTube. The attorneys’ discussions were facilitated by a retired judge. All parties believe that their respective interests are best served by entering into this settlement, particularly given the risks inherent in complex class action litigation and the time it would take to bring the litigation to a conclusion.

YouTube denies that it has done anything wrong, while the Class Representative believes that she would prevail if the case went to trial. In the interests of efficiency and avoiding substantial litigation costs, the parties decided to resolve the case through settlement. In this way, the parties avoid the costs and risks of litigation and trial.

In determining whether to approve the settlement, the Court will not decide who is right or wrong. Instead, it will determine whether the settlement is fair, reasonable, and adequate under the circumstances. If the Court approves the settlement as fair, reasonable, and adequate, it will enter a judgment extinguishing all claims of those represented in the lawsuit.

4. Why did I receive notice?

You received notice because employment records show that you may be a “Class Member”—meaning you were identified as a current or former Content Moderator who performed work for a YouTube Vendor in the United States as an employee or subcontractor of one or more of YouTube’s Vendors between January 1, 2016 and September 30, 2022. This notice lets you know how you can participate in or exclude yourself from this settlement.

5. How do I know if I am part of the settlement?

You are a Class Member if you are a current or former Content Moderator (other than Excluded Persons) who performed work in the United States as an employee or subcontractor of a YouTube Vendor between January 1, 2016 and September 30, 2022.

The following Persons (each an “Excluded Person”) are excluded from the Settlement Class and are not Class Members: (a) the Settlement Administrator; (b) employees, officers, and directors of YouTube; (c) any judge presiding over the Action and that judge’s immediate family members; and (d) Persons who properly and timely opt out of the Settlement Class by submitting a Request for Exclusion (see Section 13 below).

6. If I am part of the settlement, what are my options?

If you are a Class Member, you have several options. You may:

- a. Participate in the settlement and receive the benefits of the settlement (see Section 8 below);
- b. Object to the settlement by filing and serving an objection by December 29, 2022 (see Sections 9–11 below); or
- c. Request to be excluded from the settlement by submitting a request to be excluded by December 29, 2022 (see Section 13 below).

7. How do I participate in the settlement if it is approved by the Court?

If you want to participate in the settlement, you do not need to do anything at this time. If the settlement receives final approval, you will be sent a Per Capita Payment and potentially benefit from the practice and business practice enhancements discussed in Section 8 below. The Per Capita Payment serves as redress and consideration for the Class Release.

8. If I participate in the settlement, what will I receive?

The settlement provides both monetary payments and business practice enhancements. The following is a summary of the settlement benefits. For a complete description of the settlement and what it obligates the parties to do, you can read the full Settlement Agreement at www.ContentModeratorYTSettlement.com.

Monetary Payments

YouTube has agreed to deposit \$4,269,070 into a settlement fund as compensation for the release of the Class’s claims. Any award for attorneys’ fees and expenses, service awards to the Class Representative, and settlement administration costs will be paid from the settlement fund before making payments to Class Members.

All Class Members will receive a single “Per Capita Payment” from the net settlement fund. In exchange, all Class Members will give YouTube, to the fullest extent that the law permits, a release of all past, present, and future Claims of any nature whatsoever arising out of (a) the Action; (b) the conduct, transactions, or occurrences set forth in any pleading in the Action; (c) the Covered Conduct; and (d) the conduct of the settlement negotiations and the negotiations of this Agreement (except for representations or obligations expressly included in the Settlement Agreement).

If any money remains in the settlement fund after distribution to Class Members, it will be donated to the International Society for Traumatic Stress Studies, an organization that researches and advocates around issues of traumatic stress.

Practice and Tooling Enhancements

Although YouTube denies Plaintiff's allegations and denies that its conduct is unlawful, the parties also have agreed that YouTube will implement certain policies and procedures designed to benefit Content Moderators. These policies and procedures are based on industry best practices for content moderation and were developed in consultation with experts hired by Plaintiff. Among other things, YouTube has agreed to require its U.S. YouTube Vendors to implement the following business practice enhancements:

- Provide onsite counseling services provided by a licensed and experienced clinician trained in treating individuals suffering from trauma so that each Content Moderator will have access to onsite counseling for at least 45 minutes of individual time bi-weekly and additional onsite and virtual counseling on an as-needed basis;
- Provide access to 24/7 support, virtual counseling, and critical incident response;
- Provide monthly peer support groups and/or peer listening sessions to enable Content Moderators to meet at their discretion to discuss mental health and well-being on at least a monthly basis; and
- Provide Content Moderators with information about these practice enhancements, as well as a telephone hotline number where compliance concerns can be reported directly to YouTube.

YouTube has agreed to make reasonable commercial efforts to ensure that its U.S. Vendors provide these practice enhancements to Content Moderators.

9. How do I object to the settlement?

You can ask the Court to deny approval by filing an objection. You can't ask the Court to order a different settlement; the Court can only approve or reject the settlement. If the Court denies approval, no settlement payments will be sent out, and the lawsuit will continue. If that is what you want to happen, you should object.

To be considered, any objection must be made in writing and be filed with the Court. All written objections and supporting papers must (a) clearly identify the case name and number (*Jane Doe v. YouTube*, 4:20-CV-07493-YGR), (b) be submitted to the Court either by filing them electronically or in person at any location of the United States District Court for the Northern District of California or by mailing them to the Class Action Clerk, United States District Court for the Northern District of California, 1301 Clay Street, Suite 400S, Oakland, CA 94612, and (c) be filed or postmarked on or before the Objection/Exclusion Deadline.

10. Can I still receive a settlement award if I do object to the settlement?

If you object to the settlement but the Court approves the settlement despite your objection, you may obtain settlement benefits in the same manner as any other Class Member.

If the Court agrees with your (or any other) objection, and does not approve the settlement, you and other Class Members will not receive any settlement benefits because the settlement agreement will not become effective.

11. Can I appear at the final approval hearing?

If you do not exclude yourself from the settlement, you can (but do not have to) participate and speak for yourself at the final approval hearing. You can also have your own individual lawyer speak separately for you, but you will have to pay for that lawyer yourself.

If you want to appear, or if you want your own lawyer to participate and speak for you regarding the settlement, you and/or your lawyer must first file an objection to the settlement (as described above in Section 9). You must also include on the front of the objection the statement "I intend to appear at the hearing" and identify any persons you propose to call to testify at the hearing or evidence you intend to introduce.

12. Do I have to participate in the settlement?

You are not required to participate in the settlement, but you must take action to get out of the settlement. This is called "excluding yourself" or "opting out." If you exclude yourself from the settlement, you will not be eligible to receive any monetary compensation under the settlement. However, if you exclude yourself from the settlement, you will not be bound by any judgment or settlement of the case and will keep, subject to applicable law, your right to sue YouTube.

13. How can I exclude myself from the settlement?

To exclude yourself from the settlement, you must submit a written and signed statement requesting exclusion from the Class by December 29, 2022 to:

Doe v. YouTube Settlement Administrator
P.O. Box 301132
Los Angeles, CA 90030-1132

To be effective, this written request must contain your name, address, and telephone number, be submitted via First Class U.S. mail, and be postmarked by December 29, 2022. If you fail to submit a valid and timely request for exclusion in this manner, you will be bound by the settlement and judgment entered by the Court.

14. What is the difference between excluding myself and objecting?

Objecting is telling the Court that you do not like something about the settlement but that you still want to participate in the settlement. You can object to the settlement only if you do not exclude yourself from the settlement.

Excluding yourself from the settlement is telling the Court that you do not want to be part of the settlement. If you exclude yourself from the settlement, you cannot object to the settlement because it no longer affects you.

15. What if I do nothing?

If you do nothing, you will be a Class Member and will be bound by the settlement. This means that you cannot bring a separate lawsuit against YouTube concerning injuries and/or damages allegedly caused by viewing graphic and objectionable material while working as a Content Moderator.

16. Do I need to hire my own attorney?

You do not need to hire an attorney, but you can if you want to. The Class Representative, you, and the entire Class are already represented by the attorneys listed below, who are known as “Class Counsel”:

Steven N. Williams swilliams@saverilawfirm.com JOSEPH SAVERI LAW FIRM, LLP 601 California Street, Suite 1000 San Francisco, CA 94108 Telephone: (415) 500-6800 Facsimile: (415) 395-9940	Daniel Charest dcharest@burnscharest.com BURNS CHAREST LLP 900 Jackson Street, Suite 500 Dallas, TX 75202 Telephone: (469) 904-4550 Facsimile: (469) 444-5002	Patrick D. Murphree pmurphree@burnscharest.com Richard Yelton ryelton@burnscharest.com BURNS CHAREST LLP 365 Canal Street, Suite 1170 New Orleans, LA 70130 Telephone: (504) 799-2845 Facsimile: (504) 881-1765
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You do not need to pay for their services. They will be paid from the settlement fund. If you decide to hire your own attorney, you will have to pay for his or her services yourself.

17. What will Class Counsel and the Class Representative get from this settlement?

Class Counsel have not received compensation for their services in bringing the lawsuit. They will seek to be paid from the settlement fund. They will ask the Court for an award of attorneys’ fees and expenses of up to \$1,545,986, or 33% of the settlement fund created by the Settlement Agreement.

Plaintiff will also request a service award for the time and work she put into this lawsuit.

Class Counsel will file motions asking the Court to approve these awards. The Court may approve these awards at the final approval hearing.

18. When will the settlement be final?

The Court has scheduled a final approval hearing for February 21, 2023 at 2:00 p.m. This hearing will occur before the Hon. Yvonne Gonzalez Rogers at the United States District Court for the Northern District of California, Oakland Courthouse, Courtroom 1 – 4th Floor, 1301 Clay Street, Oakland, CA 94612. The final approval hearing may be rescheduled to a later time without further notice to you. You can check the Court’s website to see the schedule of upcoming motion hearings at <https://apps.cand.uscourts.gov/CEO/cfd.aspx?7145>.

You may, but do not have to, attend the final approval hearing. At the hearing, the Court will decide whether to approve the settlement, the requested award of attorneys’ fees and expenses, the service award for Plaintiff for prosecuting this litigation, and the costs of administering this settlement.

You may attend the final approval hearing through the use of Zoom videoconferencing. Instructions for attending via Zoom will be posted on the settlement website (www.ContentModeratorYTSettlement.com) approximately two weeks before the hearing on February 21, 2023. Any date changes will also be available through the Public Access to Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>.

After the Court rules on the final approval and either the time to appeal has expired or any appeal filed has been resolved in favor of the settlement, the settlement will become final. Once the settlement is final, Per Capita Payments will be sent to the Class Members.

19. Where can I get more information about the litigation of this case?

This notice provides only a summary of the lawsuit and settlement. For more detailed information, you may review the Amended Complaint, the Settlement Agreement, and selected other filings at the settlement website: www.ContentModeratorYTSettlement.com. You may access the Court docket in this case, for a fee, through the Court’s Public Access to Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of Court for the United States District Court for the Northern District of California, 1301 Clay Street, Oakland, CA 94612 between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

Please direct any questions regarding this notice and the settlement to the *Doe v. YouTube, Inc.* Settlement Administrator at 1-888-710-2838 or to Class Counsel. **PLEASE DO NOT TELEPHONE THE COURT.**

20. What dates should I be aware of?**December 29, 2022**

Last day to file and postmark objections to the settlement (including any requests to appear before the Court).

December 29, 2022

Last day to file and postmark requests for exclusion from the Class.

February 21, 2023, at 2:00 p.m. (unless otherwise ordered by the Court)

Final approval hearing at the Court.

EXHIBIT D



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Merrick Garland
Attorney General of the United States
950 Pennsylvania Avenue, NW
United States Department of Justice
Washington, DC 20530-0001

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Merrick Garland:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Merrick Garland
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** Copies of the *Class Action Complaint* and the *Amended Class Action Complaint* are included on the enclosed CD.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The final fairness hearing in this matter has not yet been set. Copies of the *Order re Preliminary Approval Hearing*, *Amended Order re Preliminary Approval Hearing*, and the *Motion for Fees* are included on the enclosed CD.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** Copies of the *Long Form Notice* and *Summary Notice* to be provided to the class are included on the enclosed CD.
4. **28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** Copies of the *Settlement Agreement* and the *Notice Regarding Class Size & Increase in Settlement Amount* are included on the enclosed CD.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** The parties entered into a confidential supplemental agreement that (1) specified the percentage of requests for exclusion required to trigger YouTube’s option to terminate and withdraw from the Settlement Agreement; and (2) provided a process for increasing the settlement amount in the event that the number of class members exceeded 1,300. As of January 12, 2023, no other settlement or agreement has been entered into by the Parties to this Action with each other, either directly or by and through their respective counsel.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of January 12, 2023, nor have any Notices of Dismissal been granted at this time.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** A copy of the *Class Member Data* is included on the enclosed CD.



Merrick Garland
January 12, 2023
Page 3

8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of January 12, 2023, there has been no written judicial opinion related to the settlement.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Treg Taylor
Office of the Alaska Attorney General
1031 W. 4th Avenue, Suite 200
Anchorage, AK 99501-1994

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Treg Taylor:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Treg Taylor
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** Copies of the *Class Action Complaint* and the *Amended Class Action Complaint* are included on the enclosed CD.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The final fairness hearing in this matter has not yet been set. Copies of the *Order re Preliminary Approval Hearing*, *Amended Order re Preliminary Approval Hearing*, and the *Motion for Fees* are included on the enclosed CD.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** Copies of the *Long Form Notice* and *Summary Notice* to be provided to the class are included on the enclosed CD.
4. **28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** Copies of the *Settlement Agreement* and the *Notice Regarding Class Size & Increase in Settlement Amount* are included on the enclosed CD.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** The parties entered into a confidential supplemental agreement that (1) specified the percentage of requests for exclusion required to trigger YouTube’s option to terminate and withdraw from the Settlement Agreement; and (2) provided a process for increasing the settlement amount in the event that the number of class members exceeded 1,300. As of January 12, 2023, no other settlement or agreement has been entered into by the Parties to this Action with each other, either directly or by and through their respective counsel.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of January 12, 2023, nor have any Notices of Dismissal been granted at this time.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** A copy of the *Class Member Data* is included on the enclosed CD.



Treg Taylor
January 12, 2023
Page 3

8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of January 12, 2023, there has been no written judicial opinion related to the settlement.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Steve Marshall
Office of the Alabama Attorney General
PO Box 300152
501 Washington Avenue
Montgomery, AL 36130-0152

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Steve Marshall:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Steve Marshall
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** Copies of the *Class Action Complaint* and the *Amended Class Action Complaint* are included on the enclosed CD.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The final fairness hearing in this matter has not yet been set. Copies of the *Order re Preliminary Approval Hearing*, *Amended Order re Preliminary Approval Hearing*, and the *Motion for Fees* are included on the enclosed CD.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** Copies of the *Long Form Notice* and *Summary Notice* to be provided to the class are included on the enclosed CD.
4. **28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** Copies of the *Settlement Agreement* and the *Notice Regarding Class Size & Increase in Settlement Amount* are included on the enclosed CD.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** The parties entered into a confidential supplemental agreement that (1) specified the percentage of requests for exclusion required to trigger YouTube’s option to terminate and withdraw from the Settlement Agreement; and (2) provided a process for increasing the settlement amount in the event that the number of class members exceeded 1,300. As of January 12, 2023, no other settlement or agreement has been entered into by the Parties to this Action with each other, either directly or by and through their respective counsel.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of January 12, 2023, nor have any Notices of Dismissal been granted at this time.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** A copy of the *Class Member Data* is included on the enclosed CD.



Steve Marshall
January 12, 2023
Page 3

8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of January 12, 2023, there has been no written judicial opinion related to the settlement.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Leslie Rutledge
Arkansas Attorney General Office
323 Center Street, Suite 200
Little Rock, AR 72201-2610

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Leslie Rutledge:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Leslie Rutledge
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Leslie Rutledge
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Kris Hayes
Office of the Arizona Attorney General
2005 N. Central Avenue
Phoenix, AZ 85004

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Kris Hayes:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Kris Hayes
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Kris Hayes
January 12, 2023
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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

CAFA Coordinator
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
Consumer Law Section
San Francisco, CA 94102

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear CAFA Coordinator:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



CAFA Coordinator
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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CAFA Coordinator
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Phil Weiser
Office of the Colorado Attorney General
1300 Broadway, 10th Floor
Ralph L. Carr Colorado Judicial Center
Denver, CO 80203

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Phil Weiser:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Phil Weiser
January 12, 2023
Page 2

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Phil Weiser
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

William Tong
State of Connecticut Attorney General
165 Capitol Avenue
Hartford, CT 06106

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear William Tong:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



William Tong
January 12, 2023
Page 2

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William Tong
January 12, 2023
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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Brian Schwalb
District of Columbia Attorney General
400 6th St., NW
Washington, DC 20001

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Brian Schwalb:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

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Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Brian Schwalb
January 12, 2023
Page 2

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Brian Schwalb
January 12, 2023
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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Kathy Jennings
Delaware Attorney General
820 N. French Street
Carvel State Office Building
Wilmington, DE 19801

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Kathy Jennings:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

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Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
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Filed with Court:** July 12, 2022



Kathy Jennings
January 12, 2023
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Kathy Jennings
January 12, 2023
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/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Ashley Moody
Office of the Attorney General of Florida
The Capitol, PL-01
Tallahassee, FL 32399-1050

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Ashley Moody:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name:	<i>Doe v. YouTube, Inc.</i>
Case Number:	4:20-cv-07493-YGR
Jurisdiction:	United States District Court, Northern District of California Oakland Division
Date Settlement Filed with Court:	July 12, 2022



Ashley Moody
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** Copies of the *Class Action Complaint* and the *Amended Class Action Complaint* are included on the enclosed CD.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The final fairness hearing in this matter has not yet been set. Copies of the *Order re Preliminary Approval Hearing*, *Amended Order re Preliminary Approval Hearing*, and the *Motion for Fees* are included on the enclosed CD.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** Copies of the *Long Form Notice* and *Summary Notice* to be provided to the class are included on the enclosed CD.
4. **28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** Copies of the *Settlement Agreement* and the *Notice Regarding Class Size & Increase in Settlement Amount* are included on the enclosed CD.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** The parties entered into a confidential supplemental agreement that (1) specified the percentage of requests for exclusion required to trigger YouTube’s option to terminate and withdraw from the Settlement Agreement; and (2) provided a process for increasing the settlement amount in the event that the number of class members exceeded 1,300. As of January 12, 2023, no other settlement or agreement has been entered into by the Parties to this Action with each other, either directly or by and through their respective counsel.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of January 12, 2023, nor have any Notices of Dismissal been granted at this time.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** A copy of the *Class Member Data* is included on the enclosed CD.



Ashley Moody
January 12, 2023
Page 3

8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of January 12, 2023, there has been no written judicial opinion related to the settlement.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Chris Carr
Office of the Georgia Attorney General
40 Capitol Square, SW
Atlanta, GA 30334-1300

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Chris Carr:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name:	<i>Doe v. YouTube, Inc.</i>
Case Number:	4:20-cv-07493-YGR
Jurisdiction:	United States District Court, Northern District of California Oakland Division
Date Settlement Filed with Court:	July 12, 2022



Chris Carr
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Chris Carr
January 12, 2023
Page 3

8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of January 12, 2023, there has been no written judicial opinion related to the settlement.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Holly T. Shikada
Office of the Hawaii Attorney General
425 Queen Street
Honolulu, HI 96813

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Holly T. Shikada:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Holly T. Shikada
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Holly T. Shikada
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Tom Miller
Iowa Attorney General
1305 E. Walnut Street
Hoover State Office Building
Des Moines, IA 50319

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Tom Miller:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Tom Miller
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Tom Miller
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Lawrence Wasden
State of Idaho Attorney General's Office
P.O. Box 83720
700 W. Jefferson Street, Suite 210
Boise, ID 83720-1000

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Lawrence Wasden:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name:	<i>Doe v. YouTube, Inc.</i>
Case Number:	4:20-cv-07493-YGR
Jurisdiction:	United States District Court, Northern District of California Oakland Division
Date Settlement Filed with Court:	July 12, 2022



Lawrence Wasden
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Lawrence Wasden
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Kwame Raoul
Illinois Attorney General
100 W. Randolph Street
James R. Thompson Center
Chicago, IL 60601

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Kwame Raoul:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Kwame Raoul
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Kwame Raoul
January 12, 2023
Page 3

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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Todd Rokita
Indiana Attorney General's Office
302 West Washington Street, 5th Floor
Indiana Government Center South
Indianapolis, IN 46204

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Todd Rokita:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Todd Rokita
January 12, 2023
Page 2

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Todd Rokita
January 12, 2023
Page 3

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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Derek Schmidt
Kansas Attorney General
120 S.W. 10th Ave., 2nd Floor
Topeka, KS 66612-1597

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Derek Schmidt:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Derek Schmidt
January 12, 2023
Page 2

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Derek Schmidt
January 12, 2023
Page 3

8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of January 12, 2023, there has been no written judicial opinion related to the settlement.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Daniel Cameron
Office of the Kentucky Attorney General
Capitol Building, Suite 118
700 Capitol Ave
Frankfort, KY 40601

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Daniel Cameron:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Daniel Cameron
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** Copies of the *Class Action Complaint* and the *Amended Class Action Complaint* are included on the enclosed CD.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The final fairness hearing in this matter has not yet been set. Copies of the *Order re Preliminary Approval Hearing*, *Amended Order re Preliminary Approval Hearing*, and the *Motion for Fees* are included on the enclosed CD.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** Copies of the *Long Form Notice* and *Summary Notice* to be provided to the class are included on the enclosed CD.
4. **28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** Copies of the *Settlement Agreement* and the *Notice Regarding Class Size & Increase in Settlement Amount* are included on the enclosed CD.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** The parties entered into a confidential supplemental agreement that (1) specified the percentage of requests for exclusion required to trigger YouTube’s option to terminate and withdraw from the Settlement Agreement; and (2) provided a process for increasing the settlement amount in the event that the number of class members exceeded 1,300. As of January 12, 2023, no other settlement or agreement has been entered into by the Parties to this Action with each other, either directly or by and through their respective counsel.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of January 12, 2023, nor have any Notices of Dismissal been granted at this time.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** A copy of the *Class Member Data* is included on the enclosed CD.



Daniel Cameron
January 12, 2023
Page 3

8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of January 12, 2023, there has been no written judicial opinion related to the settlement.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Jeff Landry
Office of the Louisiana Attorney General
P.O. Box 94095
Baton Rouge, LA 70804-4095

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Jeff Landry:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name:	<i>Doe v. YouTube, Inc.</i>
Case Number:	4:20-cv-07493-YGR
Jurisdiction:	United States District Court, Northern District of California Oakland Division
Date Settlement Filed with Court:	July 12, 2022



Jeff Landry
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Jeff Landry
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Maura Healey
Attorney General of Massachusetts
20th Floor
1 Ashburton Place
Boston, MA 02108-1698

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Maura Healey:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Maura Healey
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Maura Healey
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Brian Frosh
Office of the Maryland Attorney General
200 St. Paul Place
Baltimore, MD 21202-2202

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Brian Frosh:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Brian Frosh
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Brian Frosh
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Aaron Frey
Office of the Maine Attorney General
State House Station 6
Augusta, ME 04333

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Aaron Frey:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Aaron Frey
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Aaron Frey
January 12, 2023
Page 3

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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Dana Nessel
Office of the Michigan Attorney General
525 W. Ottawa Street
P.O. Box 30212
Lansing, MI 48909-0212

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Dana Nessel:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Dana Nessel
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Dana Nessel
January 12, 2023
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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Attorney General Keith Ellison
Attention: CAFA Coordinator
Suite 1400
445 Minnesota Street
St. Paul, MN 55101-2131

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Attorney General Keith Ellison:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name:	<i>Doe v. YouTube, Inc.</i>
Case Number:	4:20-cv-07493-YGR
Jurisdiction:	United States District Court, Northern District of California Oakland Division
Date Settlement Filed with Court:	July 12, 2022



Attorney General Keith Ellison
January 12, 2023
Page 2

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Attorney General Keith Ellison
January 12, 2023
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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Eric Schmitt
Missouri Attorney General's Office
207 W. High Street
Supreme Court Building
Jefferson City, MO 65101

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Eric Schmitt:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Eric Schmitt
January 12, 2023
Page 2

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6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of January 12, 2023, nor have any Notices of Dismissal been granted at this time.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** A copy of the *Class Member Data* is included on the enclosed CD.



Eric Schmitt
January 12, 2023
Page 3

8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of January 12, 2023, there has been no written judicial opinion related to the settlement.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Lynn Fitch
Mississippi Attorney General's Office
P.O. Box 220
Department of Justice
Jackson, MS 39205

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Lynn Fitch:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name:	<i>Doe v. YouTube, Inc.</i>
Case Number:	4:20-cv-07493-YGR
Jurisdiction:	United States District Court, Northern District of California Oakland Division
Date Settlement Filed with Court:	July 12, 2022



Lynn Fitch
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** Copies of the *Class Action Complaint* and the *Amended Class Action Complaint* are included on the enclosed CD.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The final fairness hearing in this matter has not yet been set. Copies of the *Order re Preliminary Approval Hearing*, *Amended Order re Preliminary Approval Hearing*, and the *Motion for Fees* are included on the enclosed CD.
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Lynn Fitch
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Austin Knudsen
Office of the Montana Attorney General
215 N. Sanders Street
Justice Bldg.
Helena, MT 59620-1401

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Austin Knudsen:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name:	<i>Doe v. YouTube, Inc.</i>
Case Number:	4:20-cv-07493-YGR
Jurisdiction:	United States District Court, Northern District of California Oakland Division
Date Settlement Filed with Court:	July 12, 2022



Austin Knudsen
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Austin Knudsen
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Josh Stein
North Carolina Attorney General
P.O.Box 629
Department of Justice
Raleigh, NC 27602-0629

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Josh Stein:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name:	<i>Doe v. YouTube, Inc.</i>
Case Number:	4:20-cv-07493-YGR
Jurisdiction:	United States District Court, Northern District of California Oakland Division
Date Settlement Filed with Court:	July 12, 2022



Josh Stein
January 12, 2023
Page 2

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Josh Stein
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Doug Peterson
Office of the Nebraska Attorney General
P.O. Box 98920
2115 State Capitol
Lincoln, NE 68509-8920

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Doug Peterson:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Doug Peterson
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Doug Peterson
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Aaron Ford
Nevada Attorney General
100 North Carson St.
Old Supreme Ct. Bldg.
Carson City, NV 89701

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Aaron Ford:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name:	<i>Doe v. YouTube, Inc.</i>
Case Number:	4:20-cv-07493-YGR
Jurisdiction:	United States District Court, Northern District of California Oakland Division
Date Settlement Filed with Court:	July 12, 2022



Aaron Ford
January 12, 2023
Page 2

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Aaron Ford
January 12, 2023
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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

John Formella
New Hampshire Attorney General
33 Capitol St.
New Hampshire Department of Justice
Concord, NH 03301-6397

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear John Formella:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



John Formella
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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John Formella
January 12, 2023
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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Matthew J. Platkin
Office of the New Jersey Attorney General
25 Market St., P.O. Box 080
Richard J. Hughes Justice Complex
Trenton, NJ 08625-0080

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Matthew J. Platkin:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name:	<i>Doe v. YouTube, Inc.</i>
Case Number:	4:20-cv-07493-YGR
Jurisdiction:	United States District Court, Northern District of California Oakland Division
Date Settlement Filed with Court:	July 12, 2022



Matthew J. Platkin
January 12, 2023
Page 2

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Matthew J. Platkin
January 12, 2023
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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Hector Balderas
Office of the New Mexico Attorney General
P.O. Drawer 1508
Santa Fe, NM 87504-1508

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Hector Balderas:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Hector Balderas
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of January 12, 2023, nor have any Notices of Dismissal been granted at this time.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** A copy of the *Class Member Data* is included on the enclosed CD.



Hector Balderas
January 12, 2023
Page 3

8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of January 12, 2023, there has been no written judicial opinion related to the settlement.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Letitia James
Office of the New York Attorney General
2nd Floor
Dept. of Law - The Capitol
Albany, NY 12224-0341

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Letitia James:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Letitia James
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Letitia James
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Drew H. Wrigley
North Dakota Office of the Attorney General
600 E. Boulevard Ave., Dept. 125
State Capitol
Bismarck, ND 58505-0040

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Drew H. Wrigley:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Drew H. Wrigley
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Drew H. Wrigley
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Dave Yost
Ohio Attorney General
30 E. Broad St., 14th Flr.
Rhodes State Office Tower
Columbus, OH 43215

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Dave Yost:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Dave Yost
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Dave Yost
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

John O'Connor
Oklahoma Office of the Attorney General
313 NE 21st St.
Oklahoma City, OK 73105

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear John O'Connor:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. ("Defendant") in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that "Jane Doe" ("Plaintiff") filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



John O'Connor
January 12, 2023
Page 2

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John O'Connor
January 12, 2023
Page 3

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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Ellen F. Rosenblum
Office of the Oregon Attorney General
1162 Court St., NE
Justice Building
Salem, OR 97301-4096

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Ellen F. Rosenblum:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name:	<i>Doe v. YouTube, Inc.</i>
Case Number:	4:20-cv-07493-YGR
Jurisdiction:	United States District Court, Northern District of California Oakland Division
Date Settlement Filed with Court:	July 12, 2022



Ellen F. Rosenblum
January 12, 2023
Page 2

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Ellen F. Rosenblum
January 12, 2023
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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Josh Shapiro
Pennsylvania Office of the Attorney General
16th Flr., Strawberry Square
Harrisburg, PA 17120

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Josh Shapiro:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Josh Shapiro
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Josh Shapiro
January 12, 2023
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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Peter Neronha
Rhode Island Office of the Attorney General
150 South Main St.
Providence, RI 02903

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Peter Neronha:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Peter Neronha
January 12, 2023
Page 2

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Peter Neronha
January 12, 2023
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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Alan Wilson
South Carolina Attorney General
P.O. Box 11549
Rembert C. Dennis Office Bldg.
Columbia, SC 29211

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Alan Wilson:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Alan Wilson
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** Copies of the *Class Action Complaint* and the *Amended Class Action Complaint* are included on the enclosed CD.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The final fairness hearing in this matter has not yet been set. Copies of the *Order re Preliminary Approval Hearing*, *Amended Order re Preliminary Approval Hearing*, and the *Motion for Fees* are included on the enclosed CD.
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4. **28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** Copies of the *Settlement Agreement* and the *Notice Regarding Class Size & Increase in Settlement Amount* are included on the enclosed CD.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** The parties entered into a confidential supplemental agreement that (1) specified the percentage of requests for exclusion required to trigger YouTube’s option to terminate and withdraw from the Settlement Agreement; and (2) provided a process for increasing the settlement amount in the event that the number of class members exceeded 1,300. As of January 12, 2023, no other settlement or agreement has been entered into by the Parties to this Action with each other, either directly or by and through their respective counsel.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of January 12, 2023, nor have any Notices of Dismissal been granted at this time.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** A copy of the *Class Member Data* is included on the enclosed CD.



Alan Wilson
January 12, 2023
Page 3

8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of January 12, 2023, there has been no written judicial opinion related to the settlement.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Mark Vargo
South Dakota Office of the Attorney General
1302 East Highway 14, Suite 1
Pierre, SD 57501-8501

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Mark Vargo:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Mark Vargo
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Mark Vargo
January 12, 2023
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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Jonathan Skrmetti
Tennessee Attorney General and Reporter
425 5th Avenue North
Nashville, TN 37243

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Jonathan Skrmetti:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

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Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Jonathan Skrmetti
January 12, 2023
Page 2

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Jonathan Skrmetti
January 12, 2023
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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Ken Paxton
Attorney General of Texas
P.O. Box 12548
Capitol Station
Austin, TX 78711-2548

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Ken Paxton:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Ken Paxton
January 12, 2023
Page 2

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Ken Paxton
January 12, 2023
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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Sean Reyes
Utah Office of the Attorney General
P.O. Box 142320
Salt Lake City, UT 84114-2320

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Sean Reyes:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Sean Reyes
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Sean Reyes
January 12, 2023
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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Susanne Young
Office of the Attorney General of Vermont
109 State St.
Montpelier, VT 05609-1001

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Susanne Young:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Susanne Young
January 12, 2023
Page 2

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Susanne Young
January 12, 2023
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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Jason Miyares
Office of the Virginia Attorney General
202 North Ninth St.
Richmond, VA 23219

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Jason Miyares:

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Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Jason Miyares
January 12, 2023
Page 2

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Jason Miyares
January 12, 2023
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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Bob Ferguson
Washington State Attorney General
P.O. Box 40100
1125 Washington St. SE
Olympia, WA 98504-0100

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Bob Ferguson:

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**Date Settlement
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Bob Ferguson
January 12, 2023
Page 2

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Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Patrick Morrissey
West Virginia Attorney General
1900 Kanawha Blvd. E.
State Capitol Complex, Bldg. 1, Rm. E-26
Charleston, WV 25305

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Patrick Morrissey:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name:	<i>Doe v. YouTube, Inc.</i>
Case Number:	4:20-cv-07493-YGR
Jurisdiction:	United States District Court, Northern District of California Oakland Division
Date Settlement Filed with Court:	July 12, 2022



Patrick Morrissey
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** Copies of the *Class Action Complaint* and the *Amended Class Action Complaint* are included on the enclosed CD.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The final fairness hearing in this matter has not yet been set. Copies of the *Order re Preliminary Approval Hearing*, *Amended Order re Preliminary Approval Hearing*, and the *Motion for Fees* are included on the enclosed CD.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** Copies of the *Long Form Notice* and *Summary Notice* to be provided to the class are included on the enclosed CD.
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5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** The parties entered into a confidential supplemental agreement that (1) specified the percentage of requests for exclusion required to trigger YouTube’s option to terminate and withdraw from the Settlement Agreement; and (2) provided a process for increasing the settlement amount in the event that the number of class members exceeded 1,300. As of January 12, 2023, no other settlement or agreement has been entered into by the Parties to this Action with each other, either directly or by and through their respective counsel.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of January 12, 2023, nor have any Notices of Dismissal been granted at this time.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** A copy of the *Class Member Data* is included on the enclosed CD.



Patrick Morrissey
January 12, 2023
Page 3

8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of January 12, 2023, there has been no written judicial opinion related to the settlement.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Josh Kaul
Office of the Wisconsin Attorney General
Rm. 114 East, P.O. Box 7857
Dept. of Justice, State Capitol
Madison, WI 53707-7857

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Josh Kaul:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Josh Kaul
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Josh Kaul
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Bridget Hill
Office of the Wyoming Attorney General
109 State Capitol
Cheyenne, WY 82002

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Bridget Hill:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*

Case Number: 4:20-cv-07493-YGR

Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Bridget Hill
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Bridget Hill
January 12, 2023
Page 3

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If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Fainu'ulelei Falefatu Ala'ilima-Utu
American Samoa Gov't
P.O. Box 7
Dept. of Legal Affairs, c/o Attorney General
Utulei, AS 96799

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Fainu'ulelei Falefatu Ala'ilima-Utu:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. ("Defendant") in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that "Jane Doe" ("Plaintiff") filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Fainu'ulelei Falefatu Ala'ilima-Utu
January 12, 2023
Page 2

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Fainu'uulelei Falefatu Ala'ilima-Utu
January 12, 2023
Page 3

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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Leevin T. Camacho
Office of the Attorney General, ITC Building
Suite 901
590 S. Marine Corps Dr.
Tamuning, Guam 96913

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Leevin T. Camacho:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Leevin T. Camacho
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

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Leevin T. Camacho
January 12, 2023
Page 3

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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Edward Manibusan
Northern Mariana Islands Attorney General
P.O. Box 10007
Administration Building
Saipan, MP 96950-8907

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Edward Manibusan:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name:	<i>Doe v. YouTube, Inc.</i>
Case Number:	4:20-cv-07493-YGR
Jurisdiction:	United States District Court, Northern District of California Oakland Division
Date Settlement Filed with Court:	July 12, 2022



Edward Manibusan
January 12, 2023
Page 2

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Edward Manibusan
January 12, 2023
Page 3

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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Domingo Emanuelli Hernández
Puerto Rico Attorney General
350 Carlos Chardón Ave.
Torre Chardón, Suite 1201
San Juan, PR 00918

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Domingo Emanuelli Hernández:

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Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Domingo Emanuelli Hernández
January 12, 2023
Page 2

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Domingo Emanuelli Hernández
January 12, 2023
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Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Denise N. George
Virgin Islands Atty. General, DOJ
GERS Complex, 2nd Floor
3438 Kronprindsens Gade
St. Thomas, VI 00802

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Denise N. George:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

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Jurisdiction: United States District Court,
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Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Denise N. George
January 12, 2023
Page 2

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4. **28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** Copies of the *Settlement Agreement* and the *Notice Regarding Class Size & Increase in Settlement Amount* are included on the enclosed CD.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** The parties entered into a confidential supplemental agreement that (1) specified the percentage of requests for exclusion required to trigger YouTube’s option to terminate and withdraw from the Settlement Agreement; and (2) provided a process for increasing the settlement amount in the event that the number of class members exceeded 1,300. As of January 12, 2023, no other settlement or agreement has been entered into by the Parties to this Action with each other, either directly or by and through their respective counsel.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of January 12, 2023, nor have any Notices of Dismissal been granted at this time.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** A copy of the *Class Member Data* is included on the enclosed CD.



Denise N. George
January 12, 2023
Page 3

8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of January 12, 2023, there has been no written judicial opinion related to the settlement.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM



1 McInnis Parkway
Suite 250
San Rafael, CA 94903

January 12, 2023

VIA PRIORITY MAIL

Zachary M. Briers
Munger, Tolles & Olson LLP
50th Floor
350 South Grand Avenue
Los Angeles, CA 90071-3426

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Zachary M. Briers:

KCC Class Action Services, LLC is the independent third-party Administrator in a class action lawsuit entitled *Doe v. YouTube, Inc.*, Case No. 4:20-cv-07493-YGR. Munger, Tolles & Olson LLP represents YouTube, Inc. (“Defendant”) in that Action. The lawsuit is pending before the Honorable Yvonne Gonzalez Rogers in the United States District Court for the Northern District of California, Oakland Division. This letter is to advise you that “Jane Doe” (“Plaintiff”) filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit; this Motion was filed on July 12, 2022 and approved on September 29, 2022.

Case Name: *Doe v. YouTube, Inc.*
Case Number: 4:20-cv-07493-YGR
Jurisdiction: United States District Court,
Northern District of California
Oakland Division

**Date Settlement
Filed with Court:** July 12, 2022



Zachary M. Briers
January 12, 2023
Page 2

Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the documents referenced below are included on the CD that is enclosed with this letter:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** Copies of the *Class Action Complaint* and the *Amended Class Action Complaint* are included on the enclosed CD.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The final fairness hearing in this matter has not yet been set. Copies of the *Order re Preliminary Approval Hearing*, *Amended Order re Preliminary Approval Hearing*, and the *Motion for Fees* are included on the enclosed CD.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** Copies of the *Long Form Notice* and *Summary Notice* to be provided to the class are included on the enclosed CD.
4. **28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** Copies of the *Settlement Agreement* and the *Notice Regarding Class Size & Increase in Settlement Amount* are included on the enclosed CD.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** The parties entered into a confidential supplemental agreement that (1) specified the percentage of requests for exclusion required to trigger YouTube’s option to terminate and withdraw from the Settlement Agreement; and (2) provided a process for increasing the settlement amount in the event that the number of class members exceeded 1,300. As of January 12, 2023, no other settlement or agreement has been entered into by the Parties to this Action with each other, either directly or by and through their respective counsel.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of January 12, 2023, nor have any Notices of Dismissal been granted at this time.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** A copy of the *Class Member Data* is included on the enclosed CD.



Zachary M. Briers
January 12, 2023
Page 3

8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there are no other opinions available at this time. As of January 12, 2023, there has been no written judicial opinion related to the settlement.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendant can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/
Fred Webb,
Case Coordinator

Enclosure – CD ROM

Last	First	Company 1
Garland	Merrick	Attorney General of the United States
Taylor	Treg	Office of the Alaska Attorney General
Marshall	Steve	Office of the Alabama Attorney General
Rutledge	Leslie	Arkansas Attorney General Office
Hayes	Kris	Office of the Arizona Attorney General
CAFA Coordinator		Office of the Attorney General
Weiser	Phil	Office of the Colorado Attorney General
Tong	William	State of Connecticut Attorney General
Schwalb	Brian	District of Columbia Attorney General
Jennings	Kathy	Delaware Attorney General
Moody	Ashley	Office of the Attorney General of Florida
Carr	Chris	Office of the Georgia Attorney General
Shikada	Holly T.	Office of the Hawaii Attorney General
Miller	Tom	Iowa Attorney General
Wasden	Lawrence	State of Idaho Attorney General's Office
Raoul	Kwame	Illinois Attorney General
Rokita	Todd	Indiana Attorney General's Office
Schmidt	Derek	Kansas Attorney General
Cameron	Daniel	Office of the Kentucky Attorney General
Landry	Jeff	Office of the Louisiana Attorney General
Healey	Maura	Attorney General of Massachusetts
Frosh	Brian	Office of the Maryland Attorney General
Frey	Aaron	Office of the Maine Attorney General
Nessel	Dana	Office of the Michigan Attorney General
Keith Ellison	Attorney General	Attention: CAFA Coordinator
Schmitt	Eric	Missouri Attorney General's Office
Fitch	Lynn	Mississippi Attorney General's Office
Knudsen	Austin	Office of the Montana Attorney General
Stein	Josh	North Carolina Attorney General
Peterson	Doug	Office of the Nebraska Attorney General
Ford	Aaron	Nevada Attorney General
Formella	John	New Hampshire Attorney General
Platkin	Matthew J.	Office of the New Jersey Attorney General
Balderas	Hector	Office of the New Mexico Attorney General
James	Letitia	Office of the New York Attorney General
Wrigley	Drew H.	North Dakota Office of the Attorney General
Yost	Dave	Ohio Attorney General
O'Connor	John	Oklahoma Office of the Attorney General
Rosenblum	Ellen F.	Office of the Oregon Attorney General
Shapiro	Josh	Pennsylvania Office of the Attorney General
Neronha	Peter	Rhode Island Office of the Attorney General
Wilson	Alan	South Carolina Attorney General
Vargo	Mark	South Dakota Office of the Attorney General
Skrmetti	Jonathan	Tennessee Attorney General and Reporter
Paxton	Ken	Attorney General of Texas
Reyes	Sean	Utah Office of the Attorney General
Young	Susanne	Office of the Attorney General of Vermont
Miyares	Jason	Office of the Virginia Attorney General
Ferguson	Bob	Washington State Attorney General
Morrisey	Patrick	West Virginia Attorney General
Kaul	Josh	Office of the Wisconsin Attorney General
Hill	Bridget	Office of the Wyoming Attorney General
Ala'ilima-Utu	Fainu'ulelei Falefatu	American Samoa Gov't
Camacho	Leevin T.	Office of the Attorney General, ITC Building
Manibusan	Edward	Northern Mariana Islands Attorney General
Hernández	Domingo Emanuelli	Puerto Rico Attorney General
George	Denise N.	Virgin Islands Atty. General, DOJ
Briers	Zachary M.	Munger, Tolles & Olson LLP

Company 2	Address 1
	United States Department of Justice
	1031 W. 4th Avenue, Suite 200
	501 Washington Avenue
	323 Center Street, Suite 200
	2005 N. Central Avenue
	Consumer Law Section
	Ralph L. Carr Colorado Judicial Center
	165 Capitol Avenue
	400 6th St., NW
	Carvel State Office Building
	The Capitol, PL-01
	40 Capitol Square, SW
	425 Queen Street
	Hoover State Office Building
	700 W. Jefferson Street, Suite 210
	James R. Thompson Center
	Indiana Government Center South
	120 S.W. 10th Ave., 2nd Floor
	700 Capitol Ave
	P.O. Box 94095
	1 Ashburton Place
	200 St. Paul Place
	State House Station 6
	P.O. Box 30212
	445 Minnesota Street
	Supreme Court Building
	Department of Justice
	Justice Bldg.
	Department of Justice
	2115 State Capitol
	Old Supreme Ct. Bldg.
	Hew Hampshire Department of Justice
	Richard J. Hughes Justice Complex
	P.O. Drawer 1508
	Dept. of Law - The Capitol
	State Capitol
	Rhodes State Office Tower
	313 NE 21st St.
	Justice Building
	16th Flr., Strawberry Square
	150 South Main St.
	Rembert C. Dennis Office Bldg.
	1302 East Highway 14, Suite 1
	425 5th Avenue North
	Capitol Station
	P.O. Box 142320
	109 State St.
	202 North Ninth St.
	1125 Washington St. SE
	State Capitol Complex, Bldg. 1, Rm. E-26
	Dept. of Justice, State Capitol
	109 State Capitol
	Dept. of Legal Affairs, c/o Attorney General
	590 S. Marine Corps Dr.
	Administration Building
	Torre Chardón, Suite 1201
	3438 Kronprindsens Gade
	350 South Grand Avenue

Address 2	City	State	Zip
950 Pennsylvania Avenue, NW	Washington	DC	20530-0001
	Anchorage	AK	99501-1994
PO Box 300152	Montgomery	AL	36130-0152
	Little Rock	AR	72201-2610
	Phoenix	AZ	85004
455 Golden Gate Ave., Suite 11000	San Francisco	CA	94102
1300 Broadway, 10th Floor	Denver	CO	80203
	Hartford	CT	06106
	Washington	DC	20001
820 N. French Street	Wilmington	DE	19801
	Tallahassee	FL	32399-1050
	Atlanta	GA	30334-1300
	Honolulu	HI	96813
1305 E. Walnut Street	Des Moines	IA	50319
P.O. Box 83720	Boise	ID	83720-1000
100 W. Randolph Street	Chicago	IL	60601
302 West Washington Street, 5th Floor	Indianapolis	IN	46204
	Topeka	KS	66612-1597
Capitol Building, Suite 118	Frankfort	KY	40601
	Baton Rouge	LA	70804-4095
20th Floor	Boston	MA	02108-1698
	Baltimore	MD	21202-2202
	Augusta	ME	04333
525 W. Ottawa Street	Lansing	MI	48909-0212
Suite 1400	St. Paul	MN	55101-2131
207 W. High Street	Jefferson City	MO	65101
P.O. Box 220	Jackson	MS	39205
215 N. Sanders Street	Helena	MT	59620-1401
P.O.Box 629	Raleigh	NC	27602-0629
P.O. Box 98920	Lincoln	NE	68509-8920
100 North Carson St.	Carson City	NV	89701
33 Capitol St.	Concord	NH	03301-6397
25 Market St., P.O. Box 080	Trenton	NJ	08625-0080
	Santa Fe	NM	87504-1508
2nd Floor	Albany	NY	12224-0341
600 E. Boulevard Ave., Dept. 125	Bismarck	ND	58505-0040
30 E. Broad St., 14th Flr.	Columbus	OH	43215
	Oklahoma City	OK	73105
1162 Court St., NE	Salem	OR	97301-4096
	Harrisburg	PA	17120
	Providence	RI	02903
P.O. Box 11549	Columbia	SC	29211
	Pierre	SD	57501-8501
	Nashville	TN	37243
P.O. Box 12548	Austin	TX	78711-2548
	Salt Lake City	UT	84114-2320
	Montpelier	VT	05609-1001
	Richmond	VA	23219
P.O. Box 40100	Olympia	WA	98504-0100
1900 Kanawha Blvd. E.	Charleston	WV	25305
Rm. 114 East, P.O. Box 7857	Madison	WI	53707-7857
	Cheyenne	WY	82002
P.O. Box 7	Utulei	AS	96799
Suite 901	Tamuning	Guam	96913
P.O. Box 10007	Saipan	MP	96950-8907
350 Carlos Chardón Ave.	San Juan	PR	00918
GERS Complex, 2nd Floor	St. Thomas	VI	00802
50th Floor	Los Angeles	CA	90071-3426

EXHIBIT E

NOTICE OF PAYMENT INSTRUCTIONS FOR *DOE VS. YOUTUBE INC*

ATTENTION: This Notice provides instructions regarding payments from the Settlement Fund established in the action entitled *Doe v. YouTube Inc.*, Case No. 20-cv-07493-YGR, in the United States District Court of Northern California. The Court has now granted final approval to the Settlement Agreement, and the Settlement Class has been certified. You were previously identified as a Settlement Class Member, and only Settlement Class Members are being sent this email.

PAYMENT INSTRUCTIONS

You may receive the individual *pro rata* payment to which you are entitled electronically or by mailed check. If you wish to receive payment electronically, please click the link below to select the option of your individual payment by either PayPay or Venmo. If you do not wish to receive this payment electronically, or you do not elect a payment method, your payment will be made by a check sent through U.S. mail. You may confirm and/or change the address that we have on file for you at the settlement website.

To select an electronic payment or to change your mailing address, you will need the **[Claim ID]** and **[PIN]** that is at the top of this email.

IN ORDER TO BE VALID, PAYMENT INFORMATION MUST BE RECEIVED ONLINE BY NO LATER THAN [DUE DATE], 11:59 p.m. PT. IF YOUR PAYMENT INFORMATION IS NOT RECEIVED, YOUR CHECK WILL BE MAILED TO YOUR ADDRESS.

PROVIDE YOUR ADDRESS AND/OR PAYMENT INFORMATION BY CLICKING HERE:

www.contentmoderatorytsettlement.com

ADDITIONAL SETTLEMENT INFORMATION

You may find additional information regarding this approved settlement at:

www.contentmoderatorytsettlement.com.

You may also contact the Settlement Administrator at admin@contentmoderatorytsettlement.com or by calling 1-888-710-2838.

EXHIBIT F

Doe v. YouTube Settlement

Administrator

P.O. Box 301132

Los Angeles, CA 90030-1132

LEGAL NOTICE

See other side for details



VISIT THE
SETTLEMENT
WEBSITE BY
SCANNING
THE PROVIDED
QR CODE

YOD

«3of9 barcode »

«BARCODE»

Postal Service: Please do not mark barcode

YOD «Claim Number»

«FIRST1» «LAST1»

«ADDRESS LINE 1» «ADDRESS LINE 2»

«CITY», «STATE»«PROVINCE» «POSTALCODE»

«COUNTRY»

NOTICE OF PAYMENT INSTRUCTIONS FOR DOE V. YOUTUBE, INC.

ATTENTION: This Notice provides instructions regarding payments from the Settlement Fund established in the action entitled Jane Doe v. YouTube, Case No. 20-cv-07493-YGR, in the United States District Court for the Northern District of California. The Court has now granted final approval to the Settlement Agreement, and the Settlement Class has been certified. You were previously identified as a Class Member, and only Class Members are being sent this postcard.

PAYMENT INSTRUCTIONS

You may receive the individual *pro rata* payment to which you are entitled electronically or by mailed check. If you wish to receive payment electronically, please visit the website below to select the option of your individual payment by either PayPal or Venmo. If you do not wish to receive this payment electronically, or you do not elect a payment method, your payment will be made by a check sent through U.S. mail. You may confirm and/or change the address that we have on file for you at the settlement website.

To select an electronic payment or to change your mailing address, you will need your **<<Claim ID>> and <<PIN>>**.

IN ORDER TO BE VALID, PAYMENT INFORMATION MUST BE RECEIVED ONLINE BY NO LATER THAN [DUE DATE], 11:59 p.m. PT. IF YOUR PAYMENT INFORMATION IS NOT RECEIVED, YOUR CHECK WILL BE MAILED TO YOUR ADDRESS.

PROVIDE YOUR ADDRESS AND/OR PAYMENT INFORMATION BY VISITING:

www.ContentModeratorYTSettlement.com.

ADDITIONAL SETTLEMENT INFORMATION

You may find additional information regarding this approved settlement at: www.ContentModeratorYTSettlement.com. You may also contact the Settlement Administrator at admin@contentmoderatorytsettlement.com or by calling 1-888-710-2838.

EXHIBIT G

Claim ID: {\var:ClaimID}

PIN: {\var:PIN}

NOTICE OF PAYMENT INSTRUCTIONS FOR *DOE VS. YOUTUBE INC*

ATTENTION: This Notice provides an update regarding payments from the Settlement Fund established in the action entitled *Doe v. YouTube Inc.*, Case No. 20-cv-07493-YGR, in the United States District Court for the Northern District of California. The Court has now granted final approval to the Settlement Agreement, and the Settlement Class has been certified. You were previously identified as a Settlement Class Member, and only Settlement Class Members are being sent this email.

CLASS MEMBER MAILING ADDRESS

According to our records we currently do not have a valid mailing address on file for you. To receive the individual *pro rata* payment to which you are entitled, you will need to submit electronic payment information or provide a mailing address. If you do not provide electronic payment information or submit a valid mailing address, you will not receive your individual *pro rata* payment.

If you wish to receive payment electronically, please click the link below to select the option of your individual payment by either PayPay or Venmo. If you do not wish to receive this payment electronically, you must provide a mailing address to which a check may be sent through U.S. mail. Provide this address at the settlement website, available at the link below.

To select an electronic payment or to provide your mailing address, you will need the **[Claim ID]** and **[PIN]** that is at the top of this email.

IN ORDER TO BE VALID, YOUR MAILING ADDRESS OR PAYMENT INFORMATION MUST BE RECEIVED ONLINE BY NO LATER THAN [DUE DATE], 11:59 p.m. PT. IF YOUR MAILING ADDRESS OR PAYMENT INFORMATION IS NOT RECEIVED, YOU WILL NOT RECEIVE A PAYMENT FROM THE SETTLEMENT.

PROVIDE YOUR ADDRESS AND/OR PAYMENT INFORMATION BY CLICKING HERE:

www.contentmoderatorytsettlement.com

ADDITIONAL SETTLEMENT INFORMATION

You may find additional information regarding this approved settlement at:

www.contentmoderatorytsettlement.com.

You may also contact the Settlement Administrator at admin@contentmoderatorytsettlement.com or by calling 1-888-710-2838.

EXHIBIT H

Claim ID: {\var:ClaimID}

PIN: {\var:PIN}

NOTICE RESCHEDULING HEARING FOR DOE V. YOUTUBE, INC.

ATTENTION: This notice provides an update regarding the final approval hearing of the class action settlement proposed in the action entitled *Doe v. YouTube, Inc.*, Case No. 20-cv-07493-YGR, in the United States District Court for the Northern District of California. The Court ordered that the final approval hearing be rescheduled to May 12, 2023, at 10:00 a.m. before the Hon. Yvonne Gonzalez Rogers at the Oakland Courthouse, Courtroom 1 – 4th Floor, 1301 Clay Street, Oakland, California 94612.

ADDITIONAL SETTLEMENT INFORMATION

You may find additional information regarding this hearing update at:

www.contentmoderatorssettlement.com

You may also contact the Settlement Administrator at admin@contentmoderatorssettlement.com or by calling 1-888-710-2838.