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Attorneys for Plaintiff and the Class

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

JANE DOE on behalf of herself and all
others similarly situated,

Plaintiff,

v.

MINDGEEK USA INCORPORATED,
MINDGEEK S.A.R.L., MG
FREESITES, LTD (D/B/A PORNHUB),
MG FREESITES II, LTD, MG
CONTENT RT LIMITED, AND 9219-
1568 QUEBEC, INC. (D/B/A
MINDGEEK),

Defendants.

Case No. 8:21-cv-00338-CJC-ADS

Hon. Cormac J. Carney

**JOINT STIPULATION AND
PROPOSED ORDER RE
AMENDED CLASS NOTICE
FORMS**

Plaintiff Jane Doe, on behalf of herself and the certified classes, and Defendants MindGeek USA Inc., MindGeek S.à.r.l., MG Freesites Ltd, MG Freesites II Ltd, 9219-1568 Quebec Inc., and MG Content RT Ltd (collectively “Defendants” and with Plaintiff, the “Parties”), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on January 26, 2024, the Court approved Plaintiff’s Renewed Motion to Approve Form and Manner of Class Notice (Dkt. 225);

WHEREAS, the Court approved “[n]otice in the form agreed upon by the parties” (Dkt. 225);

WHEREAS, the parties have conformed the Email Notice (Exhibit A) and the Press Release (Exhibit B) to the language used in the other Court-approved forms of notice concerning electronic opt-out procedures and the applicable MindGeek websites;

WHEREAS, the Parties agree that these notice forms comply with Federal Rule of Civil Procedure 23(c)(2)(B).

NOW THEREFORE, subject to the Court’s approval, the Parties stipulate that email notice will be made using the Email Notice form attached as Exhibit A and the press release will be made using the Press Release form attached as Exhibit B.

Dated: February 2, 2024

Respectfully submitted,

By: /s/ Madeline Yzurdiaga
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17 *Attorneys for Plaintiff Jane Doe and the Class*

18 By: /s/ Michael E. Williams
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- EXHIBIT A -

From: MindGeek Class Administrator
To: [Class Member email address]
Subject: Notice of MindGeek Class Action

United States District Court for the Central District of California

If you were a minor when you appeared in a video or image uploaded or viewable on Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, or XTube.com, a class action lawsuit may affect your rights

A federal court authorized this Notice. This is not a solicitation from a lawyer.

You received this Notice because you may be part of a class action lawsuit pending in the United States District Court for the Central District of California (the "Court"). The lawsuit is known as *Jane Doe v. MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, d/b/a Pornhub, MG Freesites II, LTD, MG Content RT Limited, and 9219-1568 Quebec, Inc. d/b/a MindGeek*, No. SACV 21-00338-CJC (ADSx). The Court decided this lawsuit should be a class action on behalf of a "class," or group of people, that could include you. This Notice summarizes your rights and options before an upcoming trial in August 2024.

What is this lawsuit about?

Plaintiff claims that MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, d/b/a Pornhub, MG Freesites II, LTD, MG Content RT Limited, and 9219-1568 Quebec, Inc. d/b/a MindGeek (collectively, "Defendants") systematically participated in sex-trafficking ventures involving tens of thousands of children by receiving, distributing, and profiting from droves of child sexual abuse material ("CSAM") on the websites Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com. Defendants deny any wrongdoing. The Court has not decided who is right or wrong. There is no money available now, and no guarantee there will be. However, your legal rights are affected, and you have a choice to make now.

Am I part of the Class?

The Court certified a Class and a California Subclass as detailed below.

Class: All persons who were under the age of 18 when they appeared in a video or image that has been uploaded or otherwise made available for viewing on any website owned or operated by MindGeek, including Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com, from February 19, 2011, through the present.

California Subclass: Members of the Class residing in California who were under the age of 18 when they appeared in a video or image that has been uploaded or otherwise made available for viewing on any website owned or operated by MindGeek, including Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com, from February 19, 2011, through the present.

What are my Options?

You can do nothing or exclude yourself.

Do Nothing. By doing nothing, you keep the possibility of getting money or benefits that may come from a trial or a settlement. But you give up any rights to sue Defendants separately about the same legal claims in this lawsuit. You will be bound by the result of this lawsuit.

Ask to be Excluded. If you wish to be excluded from this class action, fill out and return the Exclusion Request Form attached to this Notice. If you ask to be excluded from this lawsuit and money or benefits are later awarded, you will not share in those benefits. But you keep any rights to sue Defendants separately about the same legal claims in this lawsuit. You will not be bound by the result of this lawsuit. Your Exclusion Request may be submitted electronically or through physical mail. An Exclusion Request Form sent electronically may be sent by email to info@MindGeekClassActionLitigation.com or electronically through www.MindGeekClassActionLitigation.com. An Exclusion Request Form sent by physical mail must be mailed to: MindGeek Class Action Litigation, c/o JND Legal Administration, Exclusion Requests, P.O. Box 91491, Seattle, WA 98111. The deadline to submit your Exclusion Request Form electronically or by physical mail is **April 22, 2024**.

The Trial.

A trial is scheduled for August 2024. The Court appointed the law firm of Susman Godfrey L.L.P. to represent Class Members as Class Counsel. You do not need to attend the trial. Class Counsel will present the case for Plaintiff and the Class, and lawyers for the Defendants will present on their behalf. You or your own lawyer are welcome to come at your own expense.

Questions?

This Notice is a summary of the lawsuit and the proceedings. You can get additional information by visiting www.MindGeekClassActionLitigation.com, calling 844-566-0107, emailing info@MindGeekClassActionLitigation.com, or writing the Administrator at MindGeek Class Action Litigation c/o JND Legal Administration, P.O. Box 91491, Seattle, WA 98111. You can also call Class Counsel at 1-310-789-3100.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE

To unsubscribe from this list, please click on the following link: [Unsubscribe](#)

- EXHIBIT B -

If you were a minor when you appeared in a video or image uploaded or viewable on Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, or XTube.com, a class action lawsuit may affect your rights

Seattle, February 9, 2024/PR Newswire —JND Legal Administration

A class action lawsuit is pending in the United States District Court for the Central District of California (the “Court”). The lawsuit is known as *Jane Doe v. MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, d/b/a Pornhub, MG Freesites II, LTD, MG Content RT Limited, and 9219-1568 Quebec, Inc. d/b/a MindGeek*, No. SACV 21-00338-CJC (ADSx). The Court decided this lawsuit should be a class action on behalf of a “class,” or group of people, that could include you. Read below for a summary of your rights and options before an upcoming trial in August 2024.

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Plaintiff claims that MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, d/b/a Pornhub, MG Freesites II, LTD, MG Content RT Limited, and 9219-1568 Quebec, Inc. d/b/a MindGeek (collectively, “Defendants”) systematically participated in sex-trafficking ventures involving tens of thousands of children by receiving, distributing, and profiting from droves of child sexual abuse material (“CSAM”) on the websites Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com. Defendants deny any wrongdoing. The Court has not decided who is right or wrong. There is no money available now, and no guarantee there will be. However, your legal rights are affected, and you have a choice to make now.

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What are my Options?

You can do nothing or exclude yourself.

Do Nothing. By doing nothing, you keep the possibility of getting money or benefits that may come from a trial or a settlement. But you give up any rights to sue Defendants separately about the same legal claims in this lawsuit. You will be bound by the result of this lawsuit.

Ask to be Excluded. If a Class Member wishes to be excluded from this class action, they may fill out and return the Exclusion Request Form available on www.MindGeekClassActionLitigation.com. If you ask to be excluded from this lawsuit and money or benefits are later awarded, you will not share in those benefits. But you keep any rights to sue Defendants separately about the same legal claims in this lawsuit. You will not be bound by the result of this lawsuit. The Exclusion Request Form may be submitted electronically or through physical mail. Exclusion Request Forms sent electronically may be sent by email to info@MindGeekClassActionLitigation.com or electronically through www.MindGeekClassActionLitigation.com. Exclusion Request Forms sent by physical mail

must be mailed to: MindGeek Class Action Litigation, c/o JND Legal Administration, Exclusion Requests, P.O. Box 91491, Seattle, WA 98111. The deadline to submit your Exclusion Request Form electronically or by physical mail is April 22, 2024.

The Trial.

A trial is scheduled for August 2024. The Court appointed the law firm of Susman Godfrey L.L.P. to represent Class Members as Class Counsel. You do not need to attend the trial. Class Counsel will present the case for Plaintiff and the Class, and lawyers for the Defendants will present on their behalf. You or your own lawyer are welcome to come at your own expense.

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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11 **SOUTHERN DIVISION**

12 JANE DOE on behalf of herself and all
13 others similarly situated,

14 Plaintiff,

15 v.

16 MINDGEEK USA INCORPORATED,
17 MINDGEEK S.A.R.L., MG
18 FREESITES, LTD (D/B/A PORNHUB),
19 MG FREESITES II, LTD, MG
CONTENT RT LIMITED, AND 9219-
1568 QUEBEC, INC. (D/B/A
MINDGEEK),

Defendants.

Case No. 8:21-cv-00338-CJC-ADS

Hon. Cormac J. Carney

**[PROPOSED] ORDER RE
AMENDED CLASS NOTICE
FORMS**

1 The Court, having reviewed the Parties' Joint Stipulation re Amended Class
2 Notice Forms, now ORDERS as follows:

3 Email Notice will be made using the Email Notice form attached as Exhibit A
4 and the press release will be made using the Press Release form attached as Exhibit
5 B.

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7 **IT IS SO ORDERED.**

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Cormac J. Carney
United States District Judge

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