

**THIS IS A COURT APPROVED LEGAL NOTICE. YOU ARE NOT BEING SUED.**  
**THIS IS NOT A SOLICITATION FROM A LAWYER.**

United States District Court for the Northern District of California  
*Kishore, et al. v. Times Internet (UK) LTD.*  
Case No. 4:23-cv-03594-HSG

**NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION**

**Our records indicate you subscribed to Willow TV, and watched pre-recorded videos on Willow.tv, between July 20, 2021 and September 22, 2023. You should read this notice as you may be entitled to a payment.**

- A Settlement has been reached between Defendant Times Internet (UK) LTD. d/b/a Willow TV (“Defendant”) and Plaintiffs in a class action lawsuit pending in the United States District Court for the Northern District of California (the “Action”).
- You are included in this Settlement as a Settlement Class Member if you are a member of the following Settlement Class: all persons who subscribed to Willow TV, and watched pre-recorded videos on Willow.tv, between July 20, 2021 and September 22, 2023.
- Defendant denies each and every one of the allegations of unlawful conduct, any wrongdoing, and any liability whatsoever, and no court or other entity has made any judgment or other determination of any liability. Nevertheless, Defendant has agreed to the Settlement to avoid the costs and risks associated with continuing this case.
- Your rights are affected whether you act or don’t act. Please read this Notice carefully.

<b>SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>		<b>DEADLINE</b>
<b>SUBMIT A CLAIM</b>	<p>The only way to receive a payment from this Settlement is by submitting a timely and properly completed Claim Form that obtains approval from the Settlement Administrator. The Claim Form must be submitted no later than <b>July 21, 2026</b>. You can submit your Claim Form online on the Settlement Website or by mailing it to the Settlement Administrator.</p> <p>As a Settlement Class Member, regardless of whether you submit a Claim Form, provided that you do not opt out of the Settlement, if the Settlement is approved by the Court you will give up the right to sue the Defendant in a separate</p>	<b>July 21, 2026</b>

	lawsuit about the legal claims or factual allegations this Settlement resolves.	
<b>OPT OUT OF THE SETTLEMENT</b>	<p>You can choose to opt out of the Settlement and receive no payment. <i>See</i> FAQ 13 below for instructions on how to opt-out.</p> <p>This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims and factual allegations resolved by this Settlement. You can choose to hire your own legal counsel at your own expense.</p>	<b>July 21, 2026</b>
<b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>	If you do not opt out of the Settlement, you may object to it by writing to the Court about why you don't like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a Claim Form.	<b>July 21, 2026</b>
<b>DO NOTHING</b>	Unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not get a payment from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims or factual allegations resolved by this Settlement.	<b>No Deadline</b>

- These rights and options—and the deadlines to exercise them—are explained in this Notice. The Court in charge of this case still has to decide whether to approve the Settlement.

- This Notice summarizes the proposed Settlement. For the precise terms of the Settlement, please see the Settlement Agreement available at [www.WillowTVVPPASettlement.com](http://www.WillowTVVPPASettlement.com), by contacting class counsel, whose contact information is listed below, by accessing the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <http://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, Oakland Division, 1301 Clay Street, Oakland, CA 94612, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE  
TO INQUIRE ABOUT THIS SETTLEMENT**

## **1. Why was this Notice Issued?**

A federal court authorized this Notice because you have a right to know about the proposed Settlement of this class action lawsuit and about all of your options before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

Defendant denies each and every one of the allegations of unlawful conduct, any wrongdoing, and any liability whatsoever, and no court or other entity has made any judgment or other determination of any liability. Defendant further denies that any Class Member is entitled to any relief and, other than for Settlement purposes, that this action is appropriate for certification as a class action.

**The issuance of this Notice is not an expression of the Court's opinion on the merits or the lack of merits of Plaintiffs' claims in the case.**

## **2. What is this lawsuit about?**

This lawsuit was brought on behalf of Willow TV users who allege that Times Internet (UK) LTD. purportedly shared or otherwise made accessible to third parties personally identifiable information ("PII"), allegedly without consent, in violation of the Video Privacy Protection Act (the "VPPA") and California law. The VPPA defines PII to include information which identifies a person as having requested or obtained specific video materials or services from a video tape service provider.

Times Internet (UK) LTD. expressly denies any liability or wrongdoing. More information can be found in the Complaint, available at [www.WillowTVVPPASettlement.com](http://www.WillowTVVPPASettlement.com).

## **3. Why is there a Settlement?**

The Court did not decide in favor of Plaintiffs or Defendant. Defendant denies all claims and that it violated any law. Plaintiffs and Defendant agreed to a Settlement to avoid the costs and risks of further litigation, and to allow the Settlement Class Members to receive payments. The Settlement Class Representatives and their attorneys think the Settlement is best for all Settlement Class Members.

## **4. What does the Settlement provide?**

If the Settlement is approved by the Court, Defendant will establish a Settlement Fund of Eight hundred and fifty thousand U.S. dollars (\$850,000.00). The Settlement Fund will be used to pay all valid claims submitted by Settlement Class Members, as well as notice and

administration expenses, attorneys' fees and costs (up to 33% of the cash value of the Settlement Fund, as well as reasonable expenses), and Service Awards (up to \$7,500.00 each) for the Settlement Class Representatives.

#### **5. How much will my payment be?**

The answer depends on how many Settlement Class Members submit valid claims and how much the Court approves for payment to Class Counsel, the Service Awards, and Notice and Administration Costs. The total amount distributed will be the Qualified Settlement Fund minus any amount awarded by the Court as fees and costs to Class Counsel, any Service Awards to the Settlement Class Representatives, and Notice and Administration Costs, and such other costs, expenses, or amounts as may be awarded or allowed by the Court. The resulting amount is called the "Net Settlement Fund" which will be divided based on the estimated number of Settlement Class Members and distributed to Settlement Class Members who submit valid claims.

#### **6. What claims am I releasing if I stay in the Settlement Class?**

Unless you opt out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendant about any of the legal claims this Settlement resolves. The "Released Claims" section in the Settlement Agreement describes the legal claims that you give up ("release") if you remain in the Settlement Class. Released Claims include claims that are pled or could have been pled based on, relating to, or arising out of the identical factual predicate in the operative complaint. The Settlement Agreement and operative complaint can be found at [www.WillowTVVPPASettlement.com](http://www.WillowTVVPPASettlement.com).

#### **7. How do I submit a claim and get a payment?**

Claim Forms may be submitted online at [www.WillowTVVPPASettlement.com](http://www.WillowTVVPPASettlement.com) or by mailing a completed Claim Form to the Settlement Administrator at *Kishore, et al. v. Times Internet (UK) LTD*, c/o Settlement Administrator P.O. Box 25226, Santa Ana, CA 92799.

#### **8. What is the deadline for submitting a claim?**

The completed Claim Form must be submitted online by 11:59 p.m. PST on July 21, 2026 or postmarked by July 21, 2026.

#### **9. When will I get my payment?**

The Court has scheduled a Final Approval Hearing for the Settlement of this case on February 25, 2027 at 2:00 p.m. PST to consider: (1) whether to approve the Settlement; (2) any objections; (3) the requests for awards to the Settlement Class Representatives; and (4) the request for an award of attorneys' fees and costs to Settlement Class Counsel for their work in this litigation. If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Settlement payments will be distributed as soon as possible if the Court grants Final Approval of the Settlement and after any appeals are resolved. The briefs and declarations in support of the Final Approval of the Settlement and the requests described above will be posted on the Settlement Website after they are filed. You may ask to appear at the hearing but you do not have to appear. The date and time of the Final Approval Hearing is also subject to modification by the Court. Please review the Settlement Website for any updated information regarding the final hearing.

#### **10. Do I have lawyers in the case?**

Yes. The Court has appointed HammondLaw, P.C. to represent the Settlement Class as Class Counsel:

Julian Hammond  
Polina Brandler  
Ari Cherniak  
HammondLaw, P.C.  
1201 Pacific Ave., 6th Floor  
Tacoma, WA 98402  
310-807-1666  
[info@hammondlawpc.com](mailto:info@hammondlawpc.com)  
[www.hammondlawpc.com](http://www.hammondlawpc.com)

You will not be charged for their services.

#### **11. Should I get my own lawyer?**

You do not need to hire your own lawyer because Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

#### **12. How will my lawyers get paid?**

Class Counsel will ask the Court for an award of attorneys' fees not to exceed 33% of the Qualified Settlement Fund, as well as reasonable expenses incurred in the litigation. They will also ask the Court to approve a service award for each of the two Settlement Class Representatives not to exceed \$7,500.00 each. The Court may award less than these amounts.

Class Counsel will file a motion seeking an award of attorneys' fees and litigation expenses, as well as any request for service awards to the Plaintiffs, no later than **June 16, 2026**. The motion and all supporting materials will be available for review on the Settlement Website at [www.WillowTVVPPASettlement.com](http://www.WillowTVVPPASettlement.com) once filed.

If approved, these fees, costs and awards will be paid from the Qualified Settlement Fund.

### 13. How do I opt out of the Settlement?

If you do not want to receive any benefits from the Settlement, and you want to keep your right, if any, to separately sue the Defendant about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called "opting out" of the Settlement Class. The deadline for requesting exclusion from the Settlement is July 21, 2026.

To exclude yourself from the Settlement, you must submit an opt-out request that includes the following information: (i) the case name of the Action, *Kishore, et al. v. Times Internet (UK) LTD.*, Case No. 4:23-cv-03594-HSG (N.D. Cal.); (ii) your first and last name; (iii) email address, phone number, and mailing address; (iv) your personal signature; and, (v) a statement clearly indicating your intent to be excluded from the Settlement. The request for exclusion must be made only for the individual whose personal signature appears on the request.

If you exclude yourself, you are stating to the Court that you do not want to be part of the Settlement. You will not be eligible to receive a payment from this Settlement if you exclude yourself. You may only exclude yourself – not any other person. Opt-out requests seeking exclusion on behalf of more than one individual will be found invalid by the Settlement Administrator.

Submit your request to opt out electronically at [www.WillowTVVPPASettlement.com](http://www.WillowTVVPPASettlement.com) by no later than 11:59 p.m. PST on July 21, 2026.

### 14. How do I tell the Court if I like or do not like the Settlement?

If you are a Settlement Class Member, you can choose to object to the Settlement if you do not like it or a portion of it. You can ask the Court to deny approval by filing an objection. You

can give reasons why you think the Court should not approve it. The Court will consider your views. 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. Any comments or objections from Settlement Class Members regarding the proposed Settlement Agreement must be submitted in writing to the Court either by mailing them to the Class Action Clerk, United States District Court for the Northern District of California; or by filing them in person at any location of the United States District Court for the Northern District of California, and they must be filed or postmarked on or before July 21, 2026.

**Class Action Clerk  
United States District Court for the Northern District of California  
1301 Clay Street  
Oakland, CA 94612**

Your objection must include: (i) the case name and number: *Kishore, et al. v. Times Internet (UK) LTD.*, Case No. 4:23-cv-03594-HSG (N.D. Cal.); (ii) your full name, address, telephone number, and email address; (iii) a statement of the number of times that you (and, where applicable, your counsel) have objected to a class action settlement, along with the caption of each case in which you (or your counsel) made such objection; (iv) a statement of the specific grounds for the objection, including any legal or factual support and any evidence in support of the objection; (v) a statement of whether you intend to appear at the Final Approval Hearing, and if so, whether personally or through counsel; and (viii) your signature. You or your attorney may speak at the Final Approval Hearing about your objection. You may also appear at the Final Approval Hearing without submitting a written objection upon a showing of good cause.

**15. What is the difference between opting out and objecting?**

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and stating to the Court that you do not want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

**16. When is the Court's Final Approval Hearing?**

The Court has scheduled a Final Approval Hearing at **2:00 p.m.** on **February 25, 2027**. If the hearing proceeds in person, it will be held at the Oakland Courthouse, Courtroom 2 – 4th Floor, 1301 Clay Street, Oakland, CA 94612.

At the Final Approval Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider whether to approve Class Counsel's request for an award of attorneys' fees and expenses, as well as the Settlement Class Representatives' Service Awards. If there are objections, the Court will consider them. The Court

will listen to people who have asked to speak at the hearing. After the hearing, the Court will decide whether to approve the Settlement.

The date or time of the Final Approval Hearing may change. Please check the Settlement Website, [www.WillowTVVPPASettlement.com](http://www.WillowTVVPPASettlement.com) for any updates, and to find out whether the Final Approval Hearing will be held in person or by video conference.

### **17. Do I have to come to the Final Approval Hearing?**

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you file an objection, you do not have to come to the Final Approval Hearing to talk about it. If you file your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but such attendance is not necessary for the Court to consider your objection if it was filed on time.

### **18. What happens if I do nothing at all?**

If you are a Settlement Class Member and you do nothing, you will give up the rights to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendant and the Released Parties about the legal issues or factual allegations resolved by this Settlement. In addition, you will not receive a payment from this Settlement.

### **19. How do I get more information?**

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at the Settlement Website, [www.WillowTVVPPASettlement.com](http://www.WillowTVVPPASettlement.com).

If you have additional questions, you may contact the Settlement Administrator by email, phone, or mail:

Email: [info@WillowTVVPPASettlement.com](mailto:info@WillowTVVPPASettlement.com)

Toll-Free: (833) 386-6574

Mail: Kishore, et al. v. Times Internet (UK) LTD  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799

Publicly filed documents can also be obtained by:

- Accessing the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>;

- Visiting the office of the Clerk of the United States District Court for the Northern District of California at: Office of the Clerk, United States District Court, 1301 Clay Street, Oakland, CA 94612 between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

***Please do not telephone the Court, the Clerk's Office, or Defendant to inquire about the Settlement or the Claims Process.***