

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION

If You or Your Child Were Under the Age of 13 and Watched Content for Children on YouTube, You Could Get Money from a \$30 Million Settlement.

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

- There is a Settlement in a class action lawsuit that claims Google LLC and YouTube LLC (“Google”) violated the law when it allegedly tracked and collected personal data about children under the age of 13 without parental consent. Google denies that it did anything wrong.
- Generally, you (or your child) are included in the Settlement if you (or they) are people in the United States who, at any time from July 1, 2013 to April 1, 2020, were under 13 years old, and watched content allegedly directed to children on YouTube. You may be able to get money from this Settlement.
- A \$30 million Settlement Fund will pay money to eligible Settlement Class Members. It also will pay for (1) attorneys’ fees, costs, and expenses; (2) notice and administration costs; (3) taxes; and (4) service awards to the class representatives.
- **Your legal rights are affected even if you do nothing. Please read this Notice carefully.**

YOUR LEGAL RIGHTS AND OPTIONS	
SUBMIT A CLAIM	The only way to get a payment.
EXCLUDE YOURSELF	Get no benefits from the Settlement. This is the only option that allows you to be part of any other lawsuit against Google about the claims in this lawsuit.
OBJECT	Write to the Court about if you don’t like the Settlement.
GO TO A HEARING	Ask to speak in Court about the fairness of the Settlement.
DO NOTHING	Get no payment. Give up your rights to sue Google about the claims in this lawsuit.

- 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.
- Payments will only be made if the Court approves the Settlement and after appeals, if any, are resolved. Please be patient.

QUESTIONS? CALL TOLL-FREE 1-800-000-0000 OR VISIT WWW.YOUTUBEPRIVACYSETTLEMENT.COM

Basic Information

1. Why was this notice issued?

The Court authorized this notice because you have a right to know about a proposed Settlement, and your rights and options, before the Court decides whether to approve the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights. Your legal rights are affected whether you act or not.

Judge Susan van Keulen of the United States District Court for the Northern District of California, San Jose Division, is overseeing this case. This lawsuit is currently known as *Hubbard v. Google*, No. 5:19-cv-07016. The people who sued are called the “Plaintiffs.” Google is the “Defendant.”

2. What is this lawsuit about?

The lawsuit claims Google violated the law when it allegedly collected personal data about children under the age of 13 without parental consent. Plaintiffs claim that when children watched cartoons, nursery rhymes, and other child-directed content on YouTube, Google collected personal data from viewers and used the information for its advertising business. The lawsuit claims these alleged actions violated privacy laws.

Google denies the claims in this lawsuit and that it did anything wrong.

This notice is only a summary. More detail is provided in the Settlement Agreement, available at www.YouTubePrivacySettlement.com.

3. Why is this a class action?

In a class action, one or more people called “class representatives” sue on behalf of themselves and other people who have similar claims. Together, all of these people and entities are a “class” or “class members.” One court resolves the issues for all class members, except for those who exclude themselves from the class.

In this case, the Settlement Class Representatives are C.H. (through their guardian Nichole Hubbard); E.J., N.J., A.J., and L.J. (through their guardian Cara Jones); J.A.E. and J.R.E. (through their guardian Justin Efros); M.W. (through their guardian Renee Gilmore); A.G. (through their guardian Jay Goodwin); T.B. and S.B. (through their guardian Derek Buchanan); D.T. and D.T. (through their guardian Amanda Seeley); B.H. (through their guardian Jason Hoffman); P.A. and J.A. (through their guardian Antonio Alvarez); S.H. and D.M. (through their guardian Veronica Hicks); C.L.P. (through their guardian Sarah Dunaway); A.A. (through their guardian Pennie Frazier); J.C. and E.M. (through their guardian Lezlie Collins); L.D., D.D., A.D. (through their guardian Holly Dorso); E.B., A.B., C.B., Z.B., and I.B. (through their guardian Steven Burda); M.W., B.N., and W.N. (through their guardian Michelle Wall); G.W. (through their guardian Doug Wilkerson); and M.W.D., C.J.D., and C.A.D. (through their guardian Billy Dardanelli).

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiffs or Google. Instead, both sides have agreed to a Settlement. By agreeing to the Settlement, both sides avoid the costs and uncertainty of a trial, and Settlement Class Members receive the benefits described in this notice. The proposed Settlement does not mean that any law was broken or that Google did anything wrong. Settlement Class Counsel believes that the Settlement is best for all Settlement Class Members.

Who Is in the Settlement?

5. Who is included in the Settlement?

You (or your child) are included in the Settlement if you (or they) are people in the United States who, at any time from July 1, 2013 to April 1, 2020, were under 13 years old and watched content allegedly directed to children on YouTube.

6. Who is not included?

The Settlement Class does not include:

- Google and Google's subsidiaries and affiliates, officers, and directors;
- The judge(s) to whom these cases are or have been assigned and any member of the judge's or judges' immediate family;
- Settlement Class Counsel; and
- Anyone that excludes themselves from the Settlement Class (*see* Question 15).

7. What if I'm still not sure if I'm included?

If you are not sure whether you (or your child) are a Settlement Class Member, or have any other questions about the Settlement, visit the website, www.YouTubePrivacySettlement.com, or call the toll-free number, 1-800-000-0000. You may also send questions to the Settlement Administrator at XXXXXXXXXX, c/o A.B. Data, Ltd., P.O. Box 0000, Milwaukee, WI 53217.

The Settlement Benefits

8. What does the Settlement provide?

If the Settlement is approved and becomes final, it will provide money to Settlement Class Members. Google will pay \$30 million into a Settlement Fund. If the Settlement is approved by the Court, the Settlement Fund will be used to pay:

- Attorneys' fees up to 30% of the Settlement Fund, plus reimbursement of expenses in an amount up to \$250,000;
- Notice and administration costs;
- Taxes (and tax expenses);
- Service awards up to \$1,500 per Settlement Class Representative guardian; and
- Money to eligible Settlement Class Members.

The Settlement Agreement, available at www.YouTubePrivacySettlement.com, has more information.

9. How much will my payment be?

At this time, it is unknown how much each Settlement Class Member who files a valid claim will receive.

After the notice and administration costs, taxes (and taxes expenses); and any Court-approved attorneys' fees, costs, and expenses and service awards are paid from the Settlement Fund, the remaining amount will be used to pay eligible Settlement Class Members.

Money will be paid proportionally (or *pro rata*) to eligible Settlement Class Members. The amount of money you get will depend on the number of valid claims.

10. What happens if there are funds remaining after distribution?

If there are any funds remaining after all Settlement distributions are made, those funds will be distributed to an organization approved by the Court. No remaining funds will be returned to Google.

11. When will I get my payment?

Settlement Class Members who are eligible will receive their payments after the Court grants final approval to the Settlement and any appeals are resolved. If there are appeals, resolving them can take time. Please be patient.

12. What am I giving up to stay in the Settlement?

Unless you exclude yourself, you will give up your right to separately sue Google about the claims in this lawsuit. All of the Court's decisions will bind you. The Settlement Agreement describes the specific claims you will give up (or "release"), so read it carefully. The Settlement Agreement is available at www.YouTubePrivacySettlement.com. If you have any questions, you can talk to the lawyers listed in Question 18 for free, or you can talk to your own lawyer if you have questions about what this means.

How to Get a Payment**13. How can I get a payment?**

To ask for a payment, complete and submit a valid Claim Form. If the Settlement Class Member is a minor, or person who is under the age of 18 as of [Month 00, 2025], a parent or legal guardian must complete and submit their Claim Form.

You can get a Claim Form at www.YouTubePrivacySettlement.com or by calling 1-800-000-000.

You must submit your Proof of Claim and Release online at [website] or by mail postmarked no later than [Month 00, 2025]. Claims submitted by mail should be sent to:

XXXXXXXXXXXXX
c/o A.B. Data, Ltd.
P.O. Box 0000
Milwaukee, WI 53217

14. How do Settlement Class Members that are minors (under the age of 18) file a claim?

If a Settlement Class Member is a minor, their Claim Form must be submitted and signed by their parent or legal guardian. A minor is defined as a person who is under the age of 18 as of [Month 00, 2025].

Excluding Yourself from the Settlement

If you don't want a payment from this Settlement, but you want to keep the right to sue or continue to sue Google on your own about the claims in this lawsuit, then you must take steps to get out of the Settlement Class. This is called excluding yourself – or it is sometimes referred to as "opting out."

15. How can I get out of the Settlement?

To exclude yourself from the Settlement, you must send a letter, or completed Opt-Out Form, by mail or online saying that you want to be excluded from *Hubbard v. Google*, No. 5:19-cv-07016.

A parent or legal guardian must submit and sign an exclusion request for any Settlement Class Member who is a minor, or person who is under the age of 18 as of [Month 00, 2025].

Be sure to include your name, the Settlement Class Member's name (if you are a parent or legal guardian), address, telephone number, and your signature (including the signature of a parent or legal guardian if you or they are a minor).

You may submit your exclusion request electronically, no later than 11:59 p.m. Pacific Time, on **Month 00, 2025** at www.YouTubePrivacySettlement.com.

You may mail your exclusion request postmarked no later than [Month 00, 2025], to:

XXXXXXXXXXXXX
EXCLUSIONS
P.O. Box 173001
Milwaukee, WI 53217

QUESTIONS? CALL TOLL-FREE 1-800-000-0000 OR VISIT WWW.YOUTUBEPRIVACYSETTLEMENT.COM

16. If I exclude myself, can I still get a payment?

No. You will not get a payment if you exclude yourself.

17. If I don't exclude myself, can I sue Google for the same thing later?

No. Unless you exclude yourself, you give up the right to sue Google for the claims this Settlement resolves.

The Lawyers Representing You**18. Do I have a lawyer in the case?**

Yes. The Court has appointed lawyers at the firms Silver Golub & Teitell LLP and Pritzker Levine LLP to represent you and the other Class Members. These lawyers are called "Settlement Class Counsel." You may contact Settlement Class Counsel as follows:

Steven L. Bloch Silver Golub & Teitell LLP One Landmark Square Stamford, CT 06901	Jonathan K. Levine Pritzker Levine LLP 1900 Powell Street, Suite 450 Emeryville, CA 94608
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You will not be charged for contacting these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

19. How will the lawyers be paid?

Settlement Class Counsel have not been paid anything to date for their work on this case over the past six years. Settlement Class Counsel will ask the Court for attorneys' fees up to 30% of the Settlement Fund, plus reimbursement of expenses in an amount up to \$250,000. Settlement Class Counsel will also ask the Court for service awards for each of the Settlement Class Representatives' guardians for their work on behalf of the Settlement Class. Any attorneys' fees, expenses, and costs, and service awards approved by the Court will be paid out of the Settlement Fund.

Objecting to the Settlement**20. How can I tell the Court if I do not like the Settlement?**

As a Settlement Class Member, you have a right to object to or comment on any part of the proposed Settlement and/or the request for attorneys' fees, costs, and expenses and service awards. The Court will consider your views when deciding if it will approve the Settlement. You can't ask the Court to order a different Settlement; the Court can only approve or reject the Settlement. If the Court does not approve the Settlement, no Settlement payments will be made, and the lawsuit will continue. If that is what you want to happen, you may object.

To object, you must send a letter to the Court saying that you object to *Hubbard v. Google*, No. 5:19-cv-07016.

A parent or legal guardian must submit an objection for any Settlement Class Member who is a minor, or person who is under the age of 18 as of [Month 00, 2025].

Be sure to include:

- Your full name, the Settlement Class Member's full name (if you are objecting for a minor), address, telephone number, and email address (if applicable);
- Your lawyer's full name, address, telephone number, and email address (if you have one);
- A statement saying if your objection applies only to you (or the person objecting) or others;
- The reasons you object;

QUESTIONS? CALL TOLL-FREE 1-800-000-0000 OR VISIT WWW.YOUTUBEPRIVACYSETTLEMENT.COM

- A statement, declaration, or sworn affidavit saying, “Under penalty of perjury, I swear that (I or the Settlement Class Member) is a member of the Settlement Class”; and
- Your signature (and the signature of a parent or legal guardian if you or they are a minor).

Objections submitted through ECF must be submitted by 11:59 p.m. Pacific Time on **MONTH 00, 2025**.

You may mail your objection to the following address, postmarked no later than [**MONTH 00, 2025**]:

Court
Office of the Clerk United States District Court Northern District of California 280 South 1st Street, Room 2112 San Jose, CA 95113

21. If I object to the Settlement, can I still file a claim?

Yes. You may file a claim even if you object to, or comment on, the Settlement.

22. What is the difference between objecting and asking to be excluded?

Objecting is simply telling the Court that you do not like something about the Settlement. If you object to the Settlement, you are still a Settlement Class Member, and you can submit a Claim Form.

Excluding yourself is telling the Court that you do not want to be a part of the Settlement. If you exclude yourself, you cannot receive a payment from the Settlement. If you exclude yourself, you will also have no basis to object to the Settlement and appear at the Final Approval Hearing, because it no longer affects you.

The Final Approval Hearing

The Court will hold a hearing (called a Final Approval Hearing) to decide whether to approve the Settlement. You may attend and ask to speak, but you don't have to.

23. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing on [**Month 00, 2025**] at [**0:00 x.m.**] at the United States District Court for the Northern District of California, San Jose Division, San Jose Courthouse, Courtroom 6 – 4th Floor, 280 South 1st Street, San Jose, CA 95113. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.YouTubePrivacySettlement.com for updates.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them and may listen to people who have asked to speak at the hearing. The Court may also decide whether to award attorneys' fees, costs, and expenses, and service awards to the Settlement Class Representatives' guardians. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

24. Do I have to come to the hearing?

No. Settlement Class Counsel will answer questions the Court may have at the Final Approval Hearing. But you are welcome to come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you

mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

25. May I speak at the Final Approval Hearing?

Yes. You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you (or your attorney) must file (or send a letter) stating that it is your “Notice of Intention to Appear in *Hubbard v. Google*, No. 5:19-cv-07016.” Be sure to include your full name, the Settlement Class Member’s full name (if you are appearing for a minor, address, telephone number, and email address. You (or, if applicable, the Settlement Class Member’s parent or legal guardian) and your attorney (if you have one) must sign the Notice of Intention to Appear. Your Notice of Intention to Appear must be postmarked no later than [Month 00, 2025] and must be sent to the Court’s address listed in Question 20 or submitted through ECF by 11:59 p.m. Pacific Time on MONTH 00, 2025.

If You Do Nothing

26. What happens if I do nothing?

If you do nothing, you will not get any money from the Settlement. You will be bound by the Court’s decisions. To receive a payment, you must complete and submit a Claim Form by [Month 00, 2025] (*see* Question 13).

Getting More Information

27. How do I get more information?

This Notice is only a summary. More details are in the Settlement Agreement, available at www.YouTubePrivacySettlement.com. If you have questions, you also may contact the Settlement Administrator by writing to XXXXXXXXXX, c/o A.B. Data, Ltd., P.O. Box 0000, Milwaukee, WI 53217, emailing info@YouTubePrivacySettlement.com, or calling the toll-free number 1-800-000-0000.

You may also be able to access the Settlement Agreement and other Court documents by (a) 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>, or by visiting the Office of the Clerk, United States District Court, Northern District of California, Robert F. Peckham Federal Building & United States Courthouse, 280 South 1st Street, Room 2112, San Jose, CA 95113, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.