MICHAEL T. ZELLER (196417) DAVIDA BROOK (275370) dbrook@susmangodfrey.com michaelzeller@quinnemanuel.com KRYSTA KAUBLE PÅCHMAN MICHAEL E. WILLIAMS (181299) michaelwilliams@quinnemanuel.com DIANE CAFFERATA (190081) (280951)kpachman@susmangodfrey.com HALLEY JOSEPHS (338391) dianecafferata@quinnemanuel.com hjosephs@susmangodfrey.com ROBERT J. BÉCHER (193431) SUSMAN GODFREY L.L.P. robertbecher@quinnemanuel.com QUINN EMANUEL URQUHART & 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 SULLIVAN LLP Phone: (310) 789-3100 865 South Figueora Street 10th Floor Fax: (310) 789-3150 Los Angeles, CA 90017-2543 (See additional counsel on signature (See additional counsel on signature page) 8 page) Attorneys for Defendants Attorneys for Plaintiff and the Class Q MICHAEL J. BOWE 10 mbowe@brownrudnick.com LAUREN TABAKSBLAT 11 ltabaksblat@brownrudnick.com **BROWN RUDNICK LLP** 12 7 Times Square New York, NY 10036 13 Attorneys for Opt-Out Plaintiffs 14 15 UNITED STATES DISTRICT COURT 16 CENTRAL DISTRICT OF CALIFORNIA 17 SOUTHERN DIVISION 18 JANE DOE on behalf of herself and all Case No. 8:21-cv-00338-CJC-ADS 19 others similarly situated, Hon. Cormac J. Carney 20 Plaintiff, JOINT STIPULATION AND 21 PROPOSED ORDER EXTENDING PRE-TRIAL PROTECTIVE MINDGEEK USA INCORPORATED, **ORDER TO OPT-OUT** MINDGEEK S.A.R.L., MG FREESITES, LTD (D/B/A **PLAINTIFFS** PORNHUB), MG FREESITES II, 24 LTD, MG CONTENT RT LIMITED, AND 9219-1568 QUEBEC, INC. 25 (D/B/A MINDGEÈK), 26 Defendants. 27

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Plaintiff Jane Doe, on behalf of herself and the certified classes, 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 certain opt-out plaintiffs identified below, by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on Seprember 15, 2023, the Court entered a protective order governing "the circumstances and terms by which [Plaintiff's] identity (and the identity of any future named plaintiffs) may be disclosed to and by Defendants to minimize the potential for further harassment from her trafficker and others were her identity disclosed, and to avoid the stigma and embarrassment that would accompany exposure of her identity beyond what is necessary in this litigation." (Dkt. 148 at 2, "Pre-Trial Protective Order");

WHEREAS, on November 17, 2023, the Court granted Plaintiff's Motion for Class Certification and certified under both Federal Rules of Civil Procedure 23(b)(2) and 23(b)(3) two classes. (ECF No. 209 at 1-2.) The Court first certified a national class including "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 Defendants in the last ten years" (the "National Class"). (ECF No. 107 at 44, ¶ 154.) The Court next certified a subclass of "all persons 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 Defendants in the last ten years" (the "California Subclass", together with the National Class, the "Class"). (Id. ¶ 155);

WHEREAS, the deadline for class members to submit a request for exclusion from the Class ("Opt-Out Form") is April 22, 2024;

WHEREAS, Brown Rudnick LLP represents a group of plaintiffs that intend to submit Opt-Out Forms ("Opt-Out Plaintiffs");

1	WHEREAS, the Opt-Out F	Form contains sensitive, personally-identifying
2	information, and specifically, nam	nes, addresses and phone numbers;
3	WHEREAS, anonymity is	important to Opt-Out Plaintiffs. See Doe ex rel.
4	Jessy v. Dinkfield, 2019 WL 4233	579, at *2 (C.D. Cal. June 5, 2019) (emphasizing
5	importance of "allowing victims of	of child pornography to proceed anonymously", as
6	it "serves a strong public interest i	n protecting their identities so that other victims
7	will not be deterred from reporting	g such crimes and seeking civil remedies").
8	NOW THEREFORE, subj	ject to the Court's approval, it is stipulated that:
9	The protections afforded to	Plaintiff and any future named plaintiffs in the
10	Pre-Trial Protective Order are exte	ended to Opt-Out Plaintiffs.
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12	Dated: April 22, 2024	Respectfully submitted,
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14		/s/ Krysta Kauble Pachman
15		DAVIDA BROOK (275370)
		dbrook@susmangodfrey.com KRYSTA KAUBLE PACHMAN (280951)
16		kpachman@susmangodfrey.com
17		HALLEY W. JOSEPHS (338391)
18		hjosephs@susmangodfrey.com
		ROHIT D. NATH (316062)
19		rnath@susmangodfrey.com
20		NICHOLAS N. SPEAR (304281) nspear@susmangodfrey.com
21		MADELINE M. YZURDIAGA (344676)
22		myzurdiaga@susmangodfrey.com
		SUSMAN GODFREY L.L.P.
23		1900 Avenue of the Stars, Suite 1400
24		Los Angeles, California 90067-6029 Telephone: (310) 789-3100
25		Facsimile: (310) 789-3150
26		
		AMY GREGORY (Pro Hac Vice)
27		agregory@susmangodfrey.com
28		SUSMAN GODFREY L.L.P.

1	1301 Avenue of the Americas, 32nd Fl.
	New York, NY 10019-6023
2	Telephone: (212) 336-8330
3	Facsimile: (212) 336-8340
4	STEVE COHEN
5	POLLOCK COHEN LLP
6	111 Broadway, Ste. 1804
6	New York, NY 10006
7	Phone: (212) 337-5361
8	Attorneys for Plaintiff Jane Doe and the Class
9	
10	/s/ Michael E. Williams
11	MICHAEL T. ZELLER (196417)
	MICHAEL E. WILLIAMS (181299)
12	DIANE CAFFERATA (190081)
13	ROBERT J. BECHER (193431)
14	QUINN EMANUEL URQUHART & SULLIVAN LLP
	865 South Figueora Street 10th Floor
15	Los Angeles, CA 90017-2543
16	dianecafferata@quinnemanuel.com
17	marihenderson@quinnemanuel.com
	michaelwilliams@quinnemanuel.com
18	michaelzeller@quinnemanuel.com
19	robertbecher@quinnemanuel.com
20	BENJAMIN SADUN (287533)
21	DECHERT LLP
	US Bank Tower
22	633 West 5th Street, Suite 4900
23	Los Angeles, CA 90071-2032
24	Phone: (213) 808-5700
	Fax: (213) 808-5760 benjamin.sadun@dechert.com
25	benjamin.sadun@dechert.com
26	
27	
28	
Z0 I	

1	KATHLEEN N. MASSEY (pro hac vice)
	MICHELLE YEARY (pro hac vice)
2	HAYDEN A. COLEMAN (pro hac vice)
3	DECHERT LLP Three Bryant Park
4	1095 Avenue of the Americas
5	New York, NY 10036
	Phone: (212) 698-3500
6	Fax: (212) 698-3599
7	kathleen.massey@dechert.com mark.cheffo@dechert.com
8	michelle.yeary@dechert.com
9	hayden.coleman@dechert.com
10	Attorneys for Defendants
11	/s/ David M. Stein
12	MICHAEL J. BOWE
13	mbowe@brownrudnick.com
_	LAUREN TABAKSBLAT
14	ltabaksblat@brownrudnick.com
15	BROWN RUDNICK LLP 7 Times Square
16	New York, NY 10036
17	Telephone: (212) 209-4801
18	Fascimile: (212) 209-4801
	Attaurant for Out Out Diviniffs
19	Attorneys for Opt-Out Plaintiffs
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UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA **SOUTHERN DIVISION** JANE DOE on behalf of herself and all Case No. 8:21-cv-00338-CJC-ADS others similarly situated, Hon. Cormac J. Carney Plaintiff, [PROPOSED] ORDER EXTENDING PRE-TRIAL v. PROTECTIVE ORDER TO OPT-OUT PLAINTIFFS 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.

1	The Court, having reviewed the Parties' Joint Stipulation Extending Pre-Trial
2	Protective Order to Opt-Out Plaintiffs, now ORDERS as follows:
3	The protections afforded to Plaintiff and any future named plaintiffs in the
4	Pre-Trial Protective Order (Dkt. 148) are extended to Opt-Out Plaintiffs.
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6	IT IS SO ORDERED.
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8	The Honorable Cormac J. Carney
9	United States District Judge DATED:
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