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15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**  
17 **SOUTHERN DIVISION**

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

20 Plaintiff,

21 v.

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

26 Defendants.  
27  
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Case No. 8:21-cv-00338-CJC-ADS

*Hon. Cormac J. Carney*

**JOINT STIPULATION AND  
PROPOSED ORDER EXTENDING  
PRE-TRIAL PROTECTIVE  
ORDER TO OPT-OUT  
PLAINTIFFS**

1 Plaintiff Jane Doe, on behalf of herself and the certified classes, Defendants  
2 MindGeek USA Inc., MindGeek S.à.r.l., MG Freesites Ltd, MG Freesites II Ltd,  
3 9219-1568 Quebec Inc., and MG Content RT Ltd (collectively “Defendants”), and  
4 certain opt-out plaintiffs identified below, by and through their undersigned counsel,  
5 hereby stipulate as follows:

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

13 **WHEREAS**, on November 17, 2023, the Court granted Plaintiff’s Motion for  
14 Class Certification and certified under both Federal Rules of Civil Procedure  
15 23(b)(2) and 23(b)(3) two classes. (ECF No. 209 at 1-2.) The Court first certified a  
16 national class including “all persons who were under the age of 18 when they  
17 appeared in a video or image that has been uploaded or otherwise made available for  
18 viewing on any website owned or operated by Defendants in the last ten years” (the  
19 “National Class”). (ECF No. 107 at 44, ¶ 154.) The Court next certified a subclass  
20 of “all persons residing in California who were under the age of 18 when they  
21 appeared in a video or image that has been uploaded or otherwise made available for  
22 viewing on any website owned or operated by Defendants in the last ten years” (the  
23 “California Subclass”, together with the National Class, the “Class”). (*Id.* ¶ 155);

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

26 **WHEREAS**, Brown Rudnick LLP represents a group of plaintiffs that intend  
27 to submit Opt-Out Forms (“Opt-Out Plaintiffs”);

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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
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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*

**[PROPOSED] ORDER  
EXTENDING PRE-TRIAL  
PROTECTIVE ORDER TO OPT-  
OUT PLAINTIFFS**

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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The Honorable Cormac J. Carney  
United States District Judge

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