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6 *Attorneys for Opt-Out Plaintiff*

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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11
12 JANE DOE on behalf of herself and all
13 others similarly situated,

14 Plaintiff,

15 v.

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17 MINDGEEK USA INCORPORATED,
MINDGEEK S.A.R.L., MG
18 FREESITES, LTD (D/B/A PORNHUB),
MG FREESITES II, LTD, MG
19 CONTENT RT LIMITED, AND 9219-
20 1568 QUEBEC, INC. (D/B/A
MINDGEEK),

21 Defendants.

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

Hon. Wesley L. Hsu

**UNOPPOSED MOTION TO
RECOGNIZE OPT-OUT FORM AS
VALID EXCLUSION FROM THE
CLASS**

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1 Opt-Out Plaintiff identified below respectfully moves this Court for an Order
2 Recognizing Opt-Out Form as Valid Exclusion from the Class. In support of this
3 unopposed motion, Opt-Out Plaintiff avers the following:

4 1. The deadline for class members to submit a request for exclusion from
5 the Class (“Opt-Out Form”) was April 22, 2024.

6 2. Brown Rudnick LLP represents 44 plaintiffs that have submitted Opt-
7 Out Forms deemed valid by the Claims Administrator. Not included in this group
8 is a Brown Rudnick LLP client who committed suicide due to extreme emotional
9 distress.

10 3. After obtaining consent from counsel for Plaintiff Jane Doe and the
11 Class, and Defendants MindGeek USA Incorporated, MindGeek S.a.r.l., MG
12 Freesites Ltd, MG Freesites II Ltd, MG Content RT Limited, and 9219-1568
13 Quebec Inc., Brown Rudnick LLP submitted an Opt-Out Form for the estate of their
14 deceased client (“Opt-Out Plaintiff”) and a translated death certificate to the Claims
15 Administrator on July 8, 2024.

16 4. In addition, counsel for Opt-Out Plaintiff submitted a declaration of
17 successor signed by the deceased’s mother, demonstrating her authority to act on
18 behalf of the estate, to the Claims Administrator on July 11, 2024. At the request of
19 the Claims Administrator, Opt-Out Plaintiff filed this declaration of successor with
20 the Court on August 8, 2024.

21 5. Opt-Out Plaintiff’s Opt-Out Form was deemed valid by the Claims
22 Administrator on August 15, 2024.

23 6. Counsel for Opt-Out Plaintiff has conferred with counsel for Plaintiff
24 Jane Doe and the Class, and Defendants MindGeek USA Incorporated, MindGeek
25 S.a.r.l., MG Freesites Ltd, MG Freesites II Ltd, MG Content RT Limited, and 9219-
26 1568 Quebec Inc., and they do not oppose this motion.

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1 **WHEREFORE**, the undersigned attorneys respectfully request that this
2 Court:

3 A. Grant this Unopposed Motion to Recognize Opt-Out Form as Valid
4 Exclusion from the Class; and

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6 B. Enter an order recognizing the Opt-Out Form as part of Exhibit A to the
7 Notice of Valid Exclusions from the Class Pursuant to the Order
8 Approving Form and Manner of Notice (Dkt. 225). (Dkts. 305, 305-1.)
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Dated: August 16, 2024

Respectfully submitted,

/s/ David M. Stein
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Counsel for Opt-Out Plaintiff

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

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-WLH-ADS

**[PROPOSED] ORDER
RECOGNIZING OPT-OUT FORM
AS VALID EXCLUSION FROM
THE CLASS [DKT. 376]**

1 On August 16, 2024, Opt-Out Plaintiff filed an Unopposed Motion to
2 Recognize Opt-Out Form as Valid Exclusion from the Class.

3 The Court, having considered Opt-Out Plaintiff’s Unopposed Motion and
4 finding good cause therefore, hereby GRANTS the Unopposed Motion and
5 ORDERS as follows:

6 The Opt-Out Form submitted by Opt-Out Plaintiff on July 8, 2024 is now part
7 of Exhibit A to the Notice of Valid Exclusions from the Class Pursuant to the Order
8 Approving Form and Manner of Notice (Dkt. 225). (Dkts. 305,305-1.)

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IT IS SO ORDERED.

Dated:

HON. WESLEY L. HSU
UNITED STATES DISTRICT JUDGE