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10 *(See additional counsel on signature page)*
 11 *Attorneys for Plaintiff and the Class*

12 **UNITED STATES DISTRICT COURT**
 13 **CENTRAL DISTRICT OF CALIFORNIA**
 14 **SOUTHERN DIVISION**

16 JANE DOE on behalf of herself and all
 17 others similarly situated,

18 Plaintiff,

19 v.

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

23 Defendants.

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

Hon. Cormac J. Carney

**PROOF OF CLASS NOTICE
 DISSEMINATION PURSUANT
 TO THE ORDER APPROVING
 FORM AND MANNER OF
 NOTICE (DKT. 225)**

1 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF**
2 **RECORD:**

3 On January 26, 2024, the Court issued its “Order Granting in Substantial Part
4 Plaintiff’s Renewed Motion to Approve Form and Manner of Class Notice” (“Order
5 on Class Notice”). Dkt. 225. Pursuant to this Order, the class notice administrator,
6 JND Legal Administration LLC (“JND”), was required to provide “[n]otice in the
7 form agreed upon by the parties . . . with the exception that Defendants shall not be
8 required to post notice on their websites.” *Id.* at 7-8. Pursuant to the “Plaintiff’s
9 proposal,” *id.* at 8, JND was required to electronically mail Email Notice to all Class
10 members and Third Party Notice to all individuals who submitted content removal
11 requests on Defendants’ websites on the “Notice Date,” which was defined as within
12 fourteen days of the Order on Class Notice, Dkt. 211-10 ¶ 2. JND was also required
13 to launch its media outreach and supplemental digital efforts, and publish a press
14 release to selected newlines. *Id.* ¶¶ 5-6. Finally, JND was required to establish a
15 case-specific website with Long Form Notice, a case-specific, toll-free number, a
16 dedicated email address, and a post office box. *Id.* ¶¶ 4-5, 7. On February 2, 2024,
17 the Court issued its “Order Re Amended Class Notice Forms,” approving Email
18 Notice and the press release with language that conformed to the other Court-
19 approved forms of notice.¹ Dkt. 228.

20 Pursuant to these Orders, Class Counsel now submits this proof of
21 dissemination. Class Counsel provided lists of email addresses of known Class
22 members and those third parties who submitted content removal requests on
23 Defendants’ websites. *See* Declaration of Gina Intrepido-Bowden Regarding Notice
24 Plan Implementation (“Gina Intrepido-Bowden Declaration”) ¶¶ 7-8. On February 7
25 and 9, 2024, JND sent notice via electronic email to individuals identified as Class

26 _____
27 ¹ Per the Court’s Order on Class Notice, Plaintiff additionally alerted the Court that
28 certain media platforms refused the proposed media notice placements and identified
comparable alternatives. Dkt. 242. These alternatives are summarized in the
Supplemental Declaration of Gina Intrepido-Bowden Regarding Notice Plan attached
to that filed notice. Dkt. 242-1.

1 members and individuals who submitted content removal requests. *Id.* ¶¶ 9-10.
2 Copies of Email Notice and Third Party Email Notice are attached as Exhibits A and
3 B to the Gina Intrepido-Bowden Declaration. *Id.*

4 Starting on February 9, 2024, JND launched its media outreach and
5 supplemental digital efforts, publishing digital ads through the search engine Google
6 Display Network (“GDN”), a programmatic partner (OMTD), social media
7 platforms, Facebook and Instagram, audio streaming service providers, Spotify and
8 iHeart Radio, and newsworthy digital platforms, the *New York Times* and X. *Id.* ¶¶
9 11-21. Also on February 9, 2024, JND published a press release to select newlines.
10 *Id.* ¶¶ 22-23. Screenshots of digital notices, the digital audio script describing notice,
11 and copies of the press release are attached as Exhibits C, D, and E to the Gina
12 Intrepido-Bowden Declaration. *Id.* ¶¶ 16, 23.

13 On February 7, 2024, JND additionally established a case-specific notice
14 website, www.MindGeekClassActionLitigation.com, to provide additional
15 information to potential class members. *Id.* ¶¶ 24-26. This website provides
16 comprehensive information about this litigation, including the Long Form Notice,
17 which is attached as Exhibit F to the Gina Intrepido-Bowden Declaration. *Id.* ¶ 24.
18 JND has also established a dedicated email address,
19 info@MindGeekClassActionLitigation.com, a case-specific, toll-free number, 844-
20 566-0107, and a post office box. *Id.* ¶¶ 27-29.

21 In addition, the National Center for Missing and Exploited Children
22 (“NCMEC”) disseminated class notice to its direct service providers network, law
23 enforcement victim advocates, and NCMEC’s survivor network. *See* Declaration of
24 Madeline Yzurdiaga in Support of Proof of Mailing and Posting Pursuant to the Order
25 Approving Form and Manner of Notice (Dkt. 225) ¶¶ 2-3.

26
27 Dated: February 23, 2024

Respectfully submitted,

28 By: /s/ Madeline Yzurdiaga
DAVIDA BROOK (275370)

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10 *(See additional counsel on signature page)*
11 *Attorneys for Plaintiff and the Class*

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **SOUTHERN DIVISION**

16 JANE DOE on behalf of herself and all
17 others similarly situated,

18 Plaintiff,

19 v.

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

23 Defendants.

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

Hon. Cormac J. Carney

**DECLARATION OF MADELINE
YZURDIAGA IN SUPPORT OF
PROOF OF CLASS NOTICE
DISSEMINATION PURSUANT
TO THE ORDER APPROVING
FORM AND MANNER OF
NOTICE (DKT. 225)**

1 I, Madeline Yzurdiaga, declare as follows:

2 1. I am an active member of the State Bar of California, a member in
3 good standing to the Bar of this Court, an associate at Susman Godfrey L.L.P., and
4 one of the attorneys of record for Plaintiffs in the above-entitled action. I make this
5 declaration in support of the Proof of Notice Dissemination Pursuant to the Order
6 Approving Form and Manner of Notice (Dkt. 225). I have personal, first-hand
7 knowledge of the matters set forth below and, if called as a witness, I could and
8 would testify competently thereto.

9 2. On February 2 and 5, 2024, I provided Email Notice and Long Form
10 Notice to the National Center for Missing and Exploited Children (“NCMEC”) to
11 disseminate to NCMEC’s direct service providers network, law enforcement victim
12 advocates, and NCMEC’s survivor network.

13 3. As of the date of this declaration, I have received confirmation that
14 NCMEC has disseminated such notice to its direct service providers network, law
15 enforcement victim advocates, and NCMEC’s survivor network.

16 I declare under penalty of perjury under the laws of the United States that
17 the foregoing is true and correct.

18 Executed this 23rd day of February, 2024, at Los Angeles, California

19
20 /s/ Madeline Yzurdiaga
21 Madeline Yzurdiaga

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

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

Plaintiff,

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

CLASS ACTION

**DECLARATION OF GINA
INTREPIDO-BOWDEN
REGARDING NOTICE PLAN
IMPLEMENTATION**

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I, Gina Intrepido-Bowden hereby declare and state as follows:

1. I am a Vice President at JND Legal Administration LLC (“JND”). I am a nationally recognized legal notice expert with more than 20 years of experience designing and implementing class action legal notice programs. I have been involved in many of the largest and most complex class action notice programs, including all aspects of notice dissemination.

2. I previously submitted a *Declaration Regarding Notice Plan*, dated August 21, 2023 (ECF No. 125), which outlined JND’s background and experience with providing adequate notice to members of a certified class, including class members not identified through Defendants’ records, and outlined a proposed notice plan for this action.

3. I submitted another *Declaration Regarding Notice Plan*, dated December 22, 2023 (ECF No. 211-2), that described the proposed plan for providing notice to Class Members (the “Notice Plan”) and addressed why it is consistent with other best practicable court-approved notice programs and the requirements of Rule 23 of the Federal Rules of Civil Procedure (“Rule 23”), the Due Process Clause of the United States Constitution, and the Federal Judicial Center (“FJC”) guidelines for best practicable due process notice.

4. In its January 26, 2024 *Order Granting in Substantial Part Plaintiff’s Renewed Motion to Approve Form and Manner of Class Notice* (ECF No. 225), this Court approved the form and manner of notice, with the exception of Defendants’ posting of notice on their websites.

5. On February 8, 2024, I submitted a *Supplemental Declaration Regarding Notice Plan*, (ECF No. 242-1), that summarized necessary modifications to the Notice Plan as a result of certain media platforms’ and PR Newswire’s

1 newlines in Asian/Middle East countries, Russia, and Poland not accepting the
2 campaign's sensitive subject matter.

3 6. I submit this Declaration to update the Court on the implementation of
4 the Notice Plan with modifications.

5 **EMAIL NOTICE**

6 7. On February 2, 2024, Class Counsel provided JND an electronic file
7 containing the email addresses of individuals identified as Class Members. The
8 file contained a total of 4 records. JND analyzed the data and did not identify any
9 duplicate email addresses.

10 8. On February 2, 2024, and February 6, 2024, Class Counsel provided
11 JND with electronic files containing the email addresses of individuals identified as
12 having submitted content removal requests. These files contained a total of 2,373
13 records. JND analyzed the data and removed 199 duplicate email addresses and 4
14 Class Member email addresses. A total of 2,050 unique email addresses were
15 identified.

16 9. On February 9, 2024, JND commenced notice by electronic email to
17 individuals identified as Class Members. A representative copy of the Class
18 Member Email Notice is attached as **Exhibit A**.

19 10. On February 7, 2024, JND commenced notice by electronic mail to
20 individuals who submitted content removal requests. A representative copy of the
21 Third-Party Email Notice is attached as **Exhibit B**.

22 **MEDIA REACH PLAN**

23 11. On February 9, 2024, JND launched a digital effort targeted to adults
24 18-34 years of age ("Adults 18-34"), with an emphasis on women, through the
25 Google Display Network ("GDN"), Facebook, and Instagram. In addition, activity
26 with Spotify audio streaming launched February 20, 2024. To reach recent
27 graduates, a portion of the GDN impressions are being allocated to current college
28 students and high school graduates; those with an affinity for college safety

1 information, internet safety products, fraternities and sororities, social media
2 enthusiasts; those in market for fraternity/sorority apparel, study abroad programs;
3 and/or those with life events including college graduation, recently graduated,
4 graduating soon.

5 12. By March 21, 2024, 148 million digital impressions are scheduled to be
6 served to Adults 18-34, reaching approximately 70% of likely Class Members. As
7 of February 22, 2024, 55,784,973 digital impressions have delivered.

8 13. On February 9, 2024, JND also launched a digital effort targeting teens
9 13-17 years of age (“Teens 13-17”), with an emphasis on women/girls, through a
10 programmatic partner (OMTD), Facebook, and Instagram. In addition, on February
11 12, 2024, JND launched an audio streaming effort through iHeart radio.

12 14. By March 21, 2024, 42 million digital impressions are scheduled to be
13 served to Teens 13-17, reaching approximately 70% of likely Class Members. As of
14 February 22, 2024, 10,197,562 digital impressions have delivered.

15 15. The digital activity is being served across all devices, with an emphasis
16 on mobile. Multiple targeting strategies are being used, including *Look-a-like*
17 *Targeting* (LAL) to individuals whose characteristics match that of those who have
18 visited the case website; *Predictive Targeting* (GDN only) based on multiple data
19 points (search queries, sites visited, and digital behavior trends) used to make
20 inferences regarding future behavior/performance; *Audience Targeting* optimization
21 based on demographics, behavior, and interests of potential Class Members; and
22 *Geotargeting* optimization based on the location of potential Class Members.

23 16. Screenshots of the digital notices as they appeared on GDN, Facebook,
24 and Instagram are attached as **Exhibit C**. The 30-second audio script with Spotify
25 and iHeart is attached as **Exhibit D**.

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1 **ADDITIONAL EFFORTS**

2 17. JND is also implementing a supplemental digital effort to parents of
3 teens, supplemental digital placements with newsworthy platforms, and the
4 distribution of a global press release to extend notice exposure further.

5 ***Supplemental Digital to Parents of Teens***

6 18. On February 9, 2024, JND launched a supplemental digital effort
7 through GDN and Facebook. The GDN effort is targeting parents of children 6-17
8 years of age, with an affinity for block software, internet safety products; and/or in-
9 market for mobile phone monitoring for parents, text messaging spy apps, cell phone
10 surveillance. The Facebook effort is targeting parents of children 9-17 years of age.

11 19. By March 21, 2024, 63 million digital impressions are scheduled to be
12 served to parents. As of February 22, 2024, 25,066,252 digital impressions have
13 delivered.

14 ***Supplemental Digital with Newsworthy Platforms***

15 20. On February 9, 2024, JND launched a supplemental digital effort
16 through *New York Times*' website and X (formerly Twitter). The effort with X is
17 targeting keywords, such as sorority, frat boys, college hazing, college Greek life,
18 sorority row, college, MindGeek, illegal video recording, hazing, roofied, blacked
19 out, fraternization, video, booze; and interests including life stages - college students
20 and education - college life. Activity with *New York Times* completed on February
21 15, 2024, and the X effort is continuing until March 7, 2024.

22 21. Combined, a total of 3 million impressions are scheduled to be served
23 through the newsworthy platforms. As of February 22, 2024, 2,697,145 digital
24 impressions have delivered.

25 ***Press Release***

26 22. To further assist in getting "word of mouth" out about the litigation, on
27 February 9, 2024, JND caused a press release to be distributed to media outlets
28 throughout the U.S., Canada, Full Latin America, Pan Europe (excluding Russia and

1 Poland), and Africa (English only). The release has been picked up 650 times,
2 reaching a potential audience of 205.3 million.

3 23. Copies of the release as distributed in English, Czech, French (Canada
4 and Europe), German, Portuguese, Slovak, and Spanish (Full Latin America and
5 Spain) are attached as **Exhibit E**.

6 **CASE WEBSITE**

7 24. On February 7, 2024, JND launched an interactive, case-specific Case
8 Website at www.MindGeekClassActionLitigation.com. This URL was listed in
9 the direct notices and accessible through the digital notices. The website provides
10 comprehensive information about the litigation, including answers to frequently
11 asked questions (“FAQs”), contact information for the Notice Administrator, key
12 dates, and links to important case documents, including the Long Form Notice in
13 English, attached hereto as **Exhibit F**.

14 25. The Case Website is ADA-compliant and was optimized for mobile
15 visitors so that information loads quickly on mobile devices.

16 26. As of February 22, 2024, the Case Website has tracked a total of 37,727
17 unique users who registered 46,648 page views. JND will continue to update and
18 maintain the Case Website throughout the notice administration process.

19 **CASE EMAIL ADDRESS**

20 27. On January 31, 2024, JND established a dedicated email address,
21 info@MindGeekClassActionLitigation.com, to receive and respond to Class
22 Member inquiries. As of February 22, 2024, JND has received 2 emails to the case
23 email inbox.

24 **TOLL-FREE NUMBER**

25 28. On February 7, 2024, JND established a 24-hour, toll-free telephone
26 line, 844-566-0107, that Class Members can call to obtain information about the
27 Class Action. As of February 22, 2024, JND has received 8 calls to the toll-free
28 telephone number.

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POST OFFICE BOX

29. JND also established a dedicated post office box for this matter where potential Class Members may send their exclusion requests.

REQUESTS FOR EXCLUSION

30. The Email Notice, Third-Party Email Notice, Press Release, Long Form Notice, and Case Website informed Class Members that those who wanted to be excluded from the Class Action could do so by April 22, 2024.

31. As of February 22, 2024, JND has received 1 invalid exclusion request and no valid exclusion requests.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this on February 23, 2024, at Philadelphia, PA.



GINA INTREPIDO-BOWDEN

- EXHIBIT A -

From: info@MindGeekClassActionLitigation.com
Sent: Friday, February 9, 2024 5:00 PM
To: [REDACTED]
Subject: Notice of MindGeek Class Action
Attachments: Request For Exclusion From Class Form (Electronic).pdf; Request For Exclusion From Class Form.pdf

United States District Court for the Central District of California

If you were a minor when you appeared in a video or image uploaded or viewable on Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, or XTube.com, a class action lawsuit may affect your rights.

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

You received this Notice because you may be part of a class action lawsuit pending in the United States District Court for the Central District of California (the "Court"). The lawsuit is known as *Jane Doe 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*, No. SACV 21-00338-CJC (ADSx). The Court decided this lawsuit should be a class action on behalf of a "class," or group of people, that could include you. This Notice summarizes your rights and options before an upcoming trial in August 2024.

What is this lawsuit about?

Plaintiff claims that 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 (collectively, "Defendants") systematically participated in sex-trafficking ventures involving tens of thousands of children by receiving, distributing, and profiting from droves of child sexual abuse material ("CSAM") on the websites Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com. Defendants deny any wrongdoing. The Court has not decided who is right or wrong. There is no money available now, and no guarantee there will be. However, your legal rights are affected, and you have a choice to make now.

Am I part of the Class?

The Court certified a Class and a California Subclass as detailed below.

Class: 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 MindGeek, including Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com, from February 19, 2011, through the present.

California Subclass: Members of the Class 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 MindGeek, including Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com, from February 19, 2011, through the present.

What are my Options?

You can do nothing or exclude yourself.

Do Nothing. By doing nothing, you keep the possibility of getting money or benefits that may come from a trial or a settlement. But you give up any rights to sue Defendants separately about the same legal claims in this lawsuit. You will be bound by the result of this lawsuit.

Ask to be Excluded. If you wish to be excluded from this class action, fill out and return the Exclusion Request Form attached to this Notice. If you ask to be excluded from this lawsuit and money or benefits are later awarded, you will not share in those benefits. But you keep any rights to sue Defendants separately about the same legal claims in this lawsuit. You will not be bound by the result of this lawsuit. Your Exclusion Request may be submitted electronically or through physical mail. An Exclusion Request Form sent electronically may be sent by email to info@MindGeekClassActionLitigation.com or electronically through www.MindGeekClassActionLitigation.com. An Exclusion Request Form sent by physical mail must be mailed to: MindGeek Class Action Litigation, c/o JND Legal Administration, Exclusion Requests, P.O. Box 91491, Seattle, WA 98111. The deadline to submit your Exclusion Request Form electronically or by physical mail is **April 22, 2024**.

The Trial.

A trial is scheduled for August 2024. The Court appointed the law firm of Susman Godfrey L.L.P. to represent Class Members as Class Counsel. You do not need to attend the trial. Class Counsel will present the case for Plaintiff and the Class, and lawyers for the Defendants will present on their behalf. You or your own lawyer are welcome to come at your own expense.

Questions?

This Notice is a summary of the lawsuit and the proceedings. You can get additional information by visiting www.MindGeekClassActionLitigation.com, calling 844-566-0107, emailing info@MindGeekClassActionLitigation.com, or writing the Administrator at MindGeek Class Action Litigation c/o JND Legal Administration, P.O. Box 91491, Seattle, WA 98111. You can also call Class Counsel at 1-310-789-3100.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE

To unsubscribe from this list, please click on the following link: [Unsubscribe](#)

- EXHIBIT B -

From: MindGeek Class Administrator <info@mindgeekclassactionlitigation.com>
Sent: Thursday, February 8, 2024 10:16 AM
To: [REDACTED]
Subject: Notice of MindGeek Class Action
Attachments: Request For Exclusion From Class Form (Electronic).pdf; Request For Exclusion From Class Form.pdf

Security Notice: This email originated outside of JND. Use caution when clicking links or opening attachments.

United States District Court for the Central District of California

If you know someone that was a minor when they appeared in a video or image uploaded or viewable on Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, or XTube.com, a class action lawsuit may affect their rights

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

You received this Notice because records indicate that you may know someone who may be part of a class action lawsuit pending in the United States District Court for the Central District of California (the "Court"). The lawsuit is known as *Jane Doe 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*, No. SACV 21-00338-CJC (ADSx). The Court decided this lawsuit should be a class action on behalf of a "class," or group of people, that could include someone that you know. This Notice summarizes impacted individuals' rights and options before an upcoming trial in August 2024. We appreciate your assistance in sharing this Notice with individuals who may be affected.

What is this lawsuit about?

Plaintiff claims that 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 (collectively, "Defendants")

systematically participated in sex-trafficking ventures involving tens of thousands of children by receiving, distributing, and profiting from droves of child sexual abuse material ("CSAM") on the websites Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com. Defendants deny any wrongdoing. The Court has not decided who is right or wrong. There is no money available now, and no guarantee there will be. However, impacted persons' legal rights are affected, and they have a choice to make now.

Who is affected?

The Court certified a Class and a California Subclass as detailed below.

Class: 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 MindGeek, including on the websites Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com, from February 19, 2011, through the present.

California Subclass: Members of the Class 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 MindGeek, including on the websites Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com, from February 19, 2011, through the present.

What are Class Members' Options?

Class Members can do nothing or exclude themselves.

Do Nothing. By doing nothing, Class Members keep the possibility of getting money or benefits that may come from a trial or a settlement. But they give up any rights to sue Defendants separately about the same legal claims in this lawsuit. They will be bound by the result of this lawsuit.

Ask to be Excluded. If a Class Member wishes to be excluded from this class action, they may fill out and return the Exclusion Request Form attached to this notice. If a Class Member asks to be excluded from this lawsuit and money or benefits are later awarded, they will not share in those benefits. But they keep any rights to sue Defendants separately about the same legal claims in this lawsuit. They will not be bound by the result of this lawsuit. The Exclusion Request Form may be submitted electronically or through physical mail. Exclusion Request Forms sent electronically may be sent by email to info@MindGeekClassActionLitigation.com or electronically through

www.MindGeekClassActionLitigation.com. Exclusion Request Forms sent by physical mail must be mailed to: MindGeek Class Action Litigation, c/o JND Legal Administration, Exclusion Requests, P.O. Box 91491, Seattle, WA 98111. The deadline to submit your Exclusion Request Form electronically or by physical mail is **April 22, 2024**.

The Trial.

A trial is scheduled for August 2024. The Court appointed the law firm of Susman Godfrey L.L.P. to represent Class Members as Class Counsel. Class Members do not need to attend the trial. Class Counsel will present the case for Plaintiff and the Class, and lawyers for the Defendants will present on behalf of the Class. Class Members or their own lawyer are welcome to come at the Class Member's own expense.

Questions?

This Notice is a summary of the lawsuit and the proceedings. Additional information is available by visiting www.MindGeekClassActionLitigation.com, calling 844-566-0107, emailing info@MindGeekClassActionLitigation.com, or writing the Administrator at MindGeek Class Action Litigation, c/o JND Legal Administration P.O. Box 91491, Seattle, WA 98111. Class Counsel may also be contacted at 1-310-789-3100.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE

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- EXHIBIT C -



NUTRITION

PHYSICAL

MENTALLY

Search...

A large banner image showing a group of young people playing video games. A man in the foreground is smiling and holding a controller. A woman behind him is also smiling. The background is slightly blurred.

MENTALLY

Are video games a solution to mental health issues?

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Are video games a solution to mental health issues?

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Do you have to practically kill yourself at the gym to get results?

- Advertisement -

LEGAL NOTICE

Minors who appeared in a video or image uploaded on adult entertainment websites may be affected by a class action lawsuit

LEARN MORE

A small logo in the bottom right corner of the advertisement, consisting of the letters "JND" in a stylized font.

The screenshot shows the Symbolab website interface. At the top is a red navigation bar with the Symbolab logo, search, and utility icons. Below the navigation bar, the breadcrumb "Calculators > Math" is visible. The main content area features a white box titled "Math Calculators" containing a grid of calculator links: Binary Calculator, Hex Calculator, Log Base 2 Calculator, Log Calculator, Percent Given Value Calculator, Percentage Calculator, Percentage Error Calculator, and Value Given Percent Calculator. To the right, a laptop screen displays a "LEGAL NOTICE" regarding a class action lawsuit affecting minors on adult entertainment websites, with a "LEARN MORE" button.

Symbolab

Calculators > Math

Math Calculators

Binary Calculator Hex Calculator

Log Base 2 Calculator Log Calculator

Percent Given Value Calculator Percentage Calculator

Percentage Error Calculator Value Given Percent Calculator

LEGAL NOTICE

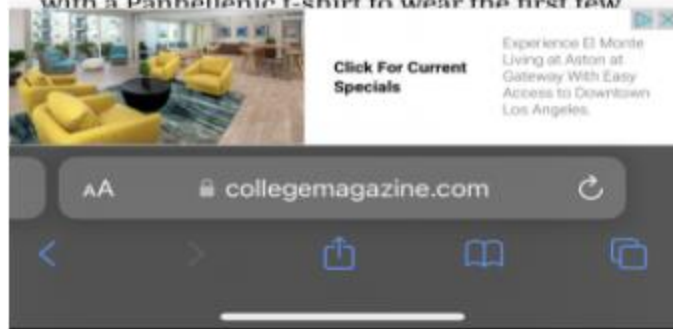
Minors who appeared in a video or image uploaded on adult entertainment websites may be affected by a class action lawsuit

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3:54



Ah, the infamous question. Generally, the attire gets dressier as the week progresses. Most universities provide potential new members with a Panhellenic t-shirt to wear the first few





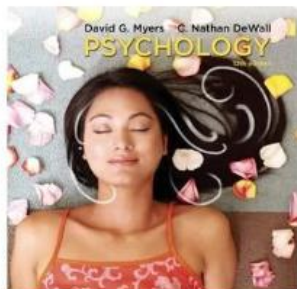
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JNO

3:52



Embracing Solo Adventures: A Guide to Traveling Alone

Ben Z. - December 12, 2023



Traveling alone might seem daunting at first, but it opens up a world of opportunities for personal growth, self-discovery, and boundless freedom. Solo travel allows you to explore new places at your own pace, make decisions independently, and immerse yourself deeply in different cultures without the influence or preferences of a travel companion. In this guide, we'll explore the benefits of traveling alone and provide tips to make the most of your solo adventures.

Planning Your Solo Trip

The key to a successful solo trip lies in finding

LEGAL NOTICE
Minors who appeared in a video or image uploaded on adult entertainment websites may be affected by a class action lawsuit

LEARN MORE



The image is a screenshot of a Facebook interface. At the top, there is a search bar and navigation icons. On the left, a sidebar shows the user's profile 'Soly Serrano' and navigation options: Friends, Memories, Saved, Groups, Video, and See more. The main content area features a sponsored post titled 'Class Action Notice' with a green megaphone icon. The post's image shows a laptop screen with the text: 'Minors who appeared in a video or image uploaded on adult entertainment websites may be affected by a class action lawsuit'. Below the image, the text 'MINDGEEKCLASSACTIONLITIGATION.COM' and 'MindGeek Class Action' is visible, along with a 'Learn more' button. At the bottom of the post are icons for Like, Comment, Share, and a privacy icon. To the right of the post, there are sections for 'Sponsored' ads, 'Friend requests' (showing Oscar Aaron Molina), and 'Birthdays' (showing Charles Webb and 5 others).





5:52   

 Class Action Notice
Sponsored 



**Minors who appeared
in a video or image
uploaded on adult
entertainment websites
may be affected by a
class action lawsuit**

Learn more 

4 likes

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- EXHIBIT D -

MindGeek :30 Audio Script

Copy template is set up for 13 point, double spaced. **Additional copy if needed.**

SFX:

COPY:

1 If you were a MINOR when you appeared in a video or image
2 uploaded or viewable on Pornhub, Pornhubpremium, Redtube,
:10 3 Redtubepremium, YouPorn, YouPornpremium, Tube8, Mofosex,
4 ExtremeTube, Spankwire, Keezmovies, Thumbzilla, or XTube
5 websites, a class action lawsuit may affect your rights. To learn
6 more about the MindGeek lawsuit, go to MindGeek Class Action
7 Litigation dot com or call EIGHT, FOUR, FOUR, FIVE, SIX, SIX,
:30 8 ZERO, ONE, ZERO, SEVEN. **Paid for by JND Legal**
9 **Administration.**
10
11
12
13
14
:60 15

- EXHIBIT E -

If you were a minor when you appeared in a video or image uploaded or viewable on Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, or XTube.com, a class action lawsuit may affect your rights

USA - English ▾



NEWS PROVIDED BY
JND Legal Administration →
09 Feb, 2024, 09:45 ET

SEATTLE, Feb. 9, 2024 /PRNewswire/ -- JND Legal Administration

A class action lawsuit is pending in the United States District Court for the Central District of California (the "Court"). The lawsuit is known as *Jane Doe 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 92198*

should be a class action on behalf of a "class," or group of people, that could include you. Read below for a summary of your rights and options before an upcoming trial in August 2024.

What is this lawsuit about?

Plaintiff claims that 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 (collectively, "Defendants") systematically participated in sex-trafficking ventures involving tens of thousands of children by receiving, distributing, and profiting from droves of child sexual abuse material ("CSAM") on the websites Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com. Defendants deny any wrongdoing. The Court has not decided who is right or wrong. There is no money available now, and no guarantee there will be. However, your legal rights are affected, and you have a choice to make now.

Am I part of the Class?

The Court certified a Class and a California Subclass as detailed below.

Class: 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 MindGeek, including Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com, from February 19, 2011, through the present.

California Subclass: Members of the Class 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 MindGeek, including Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com, from February 19, 2011, through the present.

You can do nothing or exclude yourself.

Do Nothing. By doing nothing, you keep the possibility of getting money or benefits that may come from a trial or a settlement. But you give up any rights to sue Defendants separately about the same legal claims in this lawsuit. You will be bound by the result of this lawsuit.

Ask to be Excluded. If a Class Member wishes to be excluded from this class action, they may fill out and return the Exclusion Request Form available on **www.MindGeekClassActionLitigation.com**. If you ask to be excluded from this lawsuit and money or benefits are later awarded, you will not share in those benefits. But you keep any rights to sue Defendants separately about the same legal claims in this lawsuit. You will not be bound by the result of this lawsuit. The Exclusion Request Form may be submitted electronically or through physical mail. Exclusion Request Forms sent electronically may be sent by email to **info@MindGeekClassActionLitigation.com** or electronically through **www.MindGeekClassActionLitigation.com**. Exclusion Request Forms sent by physical mail must be mailed to: MindGeek Class Action Litigation, c/o JND Legal Administration, Exclusion Requests, P.O. Box 91491, Seattle, WA 98111. The deadline to submit your Exclusion Request Form electronically or by physical mail is **April 22, 2024**.


The Trial.

A trial is scheduled for August 2024. The Court appointed the law firm of Susman Godfrey L.L.P. to represent Class Members as Class Counsel. You do not need to attend the trial. Class Counsel will present the case for Plaintiff and the Class, and lawyers for the Defendants will present on their behalf. You or your own lawyer are welcome to come at your own expense.

Questions?

This Notice is a summary of the lawsuit and the proceedings. You can get additional information by visiting **www.MindGeekClassCctionLitigation.com**, calling 844-566-0107, emailing **info@MindGeekClassActionLitigation.com**, or writing the Administrator at MindGeek Class Action Litigation, c/o JND Legal Administration P.O. Box 91491, Seattle, WA 98111. You can also call Class Counsel at 1-310-789-3100. **Please do not contact the Court.**

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Pokud jste se jako nezletilí objevili ve videu nebo na obrázku nahraném nebo zobrazeném na stránkách Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com nebo XTube.com, může vaše práva ovlivnit aktuální hromadná žaloba

USA - čeština ▾



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JND Legal Administration →
09 Feb, 2024, 09:45 ET

SEATTLE, 9. února 2024 /PRNewswire/ -- JND Legal Administration

Federální oblastní soud Spojených států pro oblast centrální Kalifornie (dále jen „soud“) se aktuálně zaobírá hromadnou žalobou. Příklad je veden jako soudní spor *Jane Doeová (anglické zástupné jméno pro anonymní žalobkyni) versus MindGeek USA Incorporated, MindGeek S.A.R.L., MG* ☞

vnímána jako hromadná žaloba jménem „skupiny“. Členem této skupiny můžete být potenciálně i vy. Níže je uveden přehled vašich práv a možností postupu před nadcházejícím soudním řízením, které proběhne v srpnu 2024.

Čeho se tento soudní spor týká?

Žalobce tvrdí, že společnosti MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, d/b/a Pornhub, MG Freesites II, LTD, MG Content RT Limited a 9219-1568 Quebec, Inc. d/b/a MindGeek (společně dále jen „žalovaní“) se systematicky podíleli na sexuálním obchodování, do kterého byly zapojeny desítky tisíc dětí, a to tak, že na internetových stránkách Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com a XTube.com přijímali, distribuovali a profitovali z velkého množství materiálů souvisejících se sexuálním zneužíváním dětí („CSAM“). Obžalovaní jakékoliv pochybení popírají. Soud prozatím o případu nijak nerozhodl. V současné době není k dispozici žádná finanční kompenzace a není zaručeno, že v budoucnu k dispozici bude. Byla však dotčena vaše zákonná práva, a proto nyní stojíte před rozhodnutím.

Jsem součástí skupiny, které se tato žaloba týká?

Soud tuto skupinu a kalifornskou podskupinu definuje následovně.

Skupina: Veškeré osoby, které v době, kdy se objevily ve videu nebo obrázku, který byl nahrán nebo jinak zpřístupněn ke zhlédnutí na jakékoli webové stránce vlastněné nebo provozované společností MindGeek, včetně Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com nebo XTube.com, byly mladší 18 let, a to s platností pro období od 19. února 2011 do současnosti.

Kalifornská podskupina: Osoby patřící do výše uvedené skupiny s trvalým pobytem ve státě Kalifornie, které v době, kdy se objevily ve videu nebo obrázku, který byl nahrán nebo jinak zpřístupněn ke zhlédnutí na jakékoli webové stránce vlastněné nebo provozované společností MindGeek, včetně Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, ☞

Spankwire.com, Keezmovies.com, Thumbzilla.com nebo XTube.com, byly mladší 18 let, a to s platností pro období od 19. února 2011 do současnosti.

Jaké mám možnosti?

Můžete se zdržet jakéhokoliv jednání nebo můžete požádat, abyste byli z účasti na žalobě vyloučeni.

Zdržet se jednání. Pokud se zdržíte jakéhokoliv jednání, zachováte si možnost získat finanční kompenzaci nebo příspěvky, které mohou ze soudního řízení nebo z následného soudního vyrovnání vyplynout. Vzdáváte se nicméně veškerého práva žalovat obžalované v tomto soudním řízení samostatně ve věci shodných právních nároků. Výsledek tohoto soudního řízení pro vás bude závazný.

Žádost o vyloučení. Pokud si člen skupiny přeje být z této hromadné žaloby vyloučen, může vyplnit a odeslat formulář pro žádost o vyloučení, který je k dispozici na adrese

www.MindGeekClassActionLitigation.com. Pokud požádáte o vyloučení z tohoto soudního řízení a později na základě jeho výsledku vznikne nárok na finanční kompenzaci nebo příspěvky, váš nárok na takovou kompenzaci zaniká. Zachováte si nicméně veškeré právo žalovat obžalované v tomto soudním řízení samostatně ve věci shodných právních nároků. Výsledek tohoto soudního řízení pro vás nebude závazný. Formulář žádosti o vyloučení lze podat elektronicky nebo ho zaslat poštou ve fyzické podobě. Formuláře žádostí o vyloučení zasílaný elektronickou formou můžete zaslat e-mailem na adresu **info@MindGeekClassActionLitigation.com** nebo ho podat elektronicky prostřednictvím stránek **www.MindGeekClassActionLitigation.com**. Formuláře žádostí o vyloučení zaslané poštou ve fyzické podobě je třeba zaslat na adresu: MindGeek Class Action Litigation, c/o JND Legal Administration, Exclusion Requests, P.O. Box 91491, Seattle, WA 98111. Termín pro zaslání formuláře žádosti o vyloučení elektronickou formou nebo poštou ve fyzické podobě je **22. dubna 2024.**

Soudní řízení.

Soudní řízení je naplánováno na srpen 2024. Soud jakožto právního zástupce skupiny jmenoval advokátní kancelář Susman Godfrey L.L.P. Soudního jednání se nemusíte účastnit. Za žalobce a skupinu bude věc prezentovat právní zástupce skupiny a za žalované jejich právníci. Pokud se vy sami nebo váš právník chcete jednání zúčastnit, můžete tak učinit na vlastní náklady.

Toto oznámení shrnuje základní body žaloby a postup soudního řízení. Další informace můžete získat na adrese www.MindGeekClassCctionLitigation.com, na telefonním čísle 844-566-0107, e-mailem na adrese info@MindGeekClassActionLitigation.com nebo písemně na adrese správce MindGeek Class Action Litigation, c/o JND Legal Administration P.O. Box 91491, Seattle, WA 98111. Můžete také kontaktovat právního zástupce skupiny na čísle 1-310-789-3100. **Žádáme vás, abyste se neobraceli přímo na soud samotný.**

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Si vous étiez mineur lorsque vous êtes apparu dans une vidéo ou sur une image téléchargée ou visible sur Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, ou XTube.com, un recours collectif pourrait avoir une incidence sur vos droits

USA - Français ▾



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09 Feb, 2024, 09:45 ET

SEATTLE, 9 février 2024 /PRNewswire/ -- JND Legal Administration

Case 8:21-cv-00338-WLH-ADS Document 259-7 Filed 02/23/24 Page 11 of 37 Page ID #:16600

Un recours collectif est en instance devant le Tribunal de district des États-Unis pour le district central de la Californie (le « Tribunal »). L'action est connue sous le nom de *Jane Doe c. MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, dénomination sociale Pornhub, MG Freesites II, LTD, MG Content RT Limited, et 9219-1568 Québec, Inc., dénomination sociale MindGeek*, No SACV 21-00338-CJC (ADSx). Le Tribunal a décidé que cette poursuite devrait être un recours collectif au nom d'un « groupe » ou d'un groupe de personnes dont vous pourriez faire partie. Vous trouverez ci-dessous un résumé de vos droits et de vos options avant le procès qui se tiendra en août 2024.

Quel est l'objet de cette action ?

Le demandeur prétend que MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, dénomination sociale Pornhub, MG Freesites II, LTD, MG Content RT Limited, et 9219-1568 Québec, Inc., dénomination sociale MindGeek (appelés collectivement les « défendeurs ») ont systématiquement participé à des activités de trafic sexuel impliquant des dizaines de milliers d'enfants, en recevant, distribuant et profitant d'une multitude de documents d'abus sexuels sur les enfants sur les sites Web Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com et XTube.com. Les défendeurs nient tout acte répréhensible. Le Tribunal n'a pas déterminé qui a raison ou qui a tort. Il n'y a pas d'argent disponible actuellement, et il n'y a aucune garantie qu'il y en aura. Cependant, vos droits légaux sont touchés, et vous avez une décision à prendre maintenant.

Est-ce que je fais partie de ce groupe ?

Le Tribunal a autorisé un groupe et un sous-groupe California Subclass comme il est décrit ci-dessous.

Groupe : Toutes les personnes qui étaient âgées de moins de 18 ans lorsqu'elles sont apparues dans une vidéo ou une image qui a été téléchargée ou mise autrement à la disposition du public sur tout site Web appartenant à MindGeek ou exploité par celui-ci, y compris Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com et XTube.com, depuis le 19 février 2011 jusqu'à aujourd'hui.

moins de 18 ans lorsqu'ils ont figuré dans une vidéo ou une image qui a été téléchargée ou mise autrement à la disposition du public sur tout site Web appartenant à MindGeek ou exploité par cette dernière, y compris Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com et XTube.com, depuis le 19 février 2011 jusqu'à aujourd'hui.

Quelles sont mes options ?

Vous pouvez ne rien faire ou vous exclure.

Ne rien faire. En ne faisant rien, vous conservez la possibilité d'obtenir de l'argent ou des avantages qui pourraient découler d'un procès ou d'un règlement. Mais vous renoncez à tout droit de poursuivre les défendeurs séparément au sujet des mêmes réclamations en justice dans cette poursuite. Vous serez lié par le résultat de cette poursuite.

Demander une exclusion. Si un membre du groupe souhaite être exclu de ce recours collectif, il peut remplir et retourner le formulaire de demande d'exclusion disponible sur **www.MindGeekClassActionLitigation.com**. Si vous demandez à être exclu de cette action et que de l'argent ou des avantages sont accordés par la suite, vous n'aurez pas droit à ces avantages. Mais vous conservez tout droit de poursuivre les défendeurs séparément au sujet des mêmes réclamations en justice dans le cadre de cette action. Vous ne serez pas lié par le résultat de cette poursuite. Le formulaire de demande d'exclusion peut être soumis par voie électronique ou par courrier. Les formulaires électroniques de demande d'exclusion peuvent être envoyés par e-mail à **info@MindGeekClassActionLitigation.com** ou en ligne à **www.MindGeekClassActionLitigation.com**. Les formulaires de demande d'exclusion envoyés par la poste doivent être acheminés à : MindGeek Class Action Litigation, c/o JND Legal Administration, Exclusion Requests, P.O. Box 91491, Seattle, WA 98111. La date limite pour soumettre votre formulaire de demande d'exclusion par voie électronique ou par la poste est **le 22 avril 2024**.

Le procès.

Un procès doit avoir lieu en août 2024. Le Tribunal a désigné le cabinet d'avocats Susman Godfrey L.L.P. pour représenter les membres du groupe en tant qu'avocat du recours collectif. Vous n'avez pas besoin d'assister au procès. L'avocat du recours collectif présentera l'affaire pour le demandeur et le groupe, et les avocats des défendeurs présenteront l'affaire en leur nom. Vous ou votre avocat êtes les bienvenus et pouvez y assister à vos frais.

Des questions ?

Le présent avis est un résumé de la poursuite et de la procédure. Vous pouvez obtenir de plus amples renseignements en consultant le site www.MindGeekClassCctionLitigation.com, en composant le 844-566-0107, en envoyant un e-mail à info@MindGeekClassActionLitigation.com ou en écrivant à l'administrateur à l'adresse MindGeek Class Action Litigation, a/s JND Legal Administration P.O. Box 91491, Seattle, WA 98111. Vous pouvez également communiquer avec l'avocat du recours collectif au 1 310 789-3100. **Veillez ne pas communiquer avec le Tribunal.**

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Si vous étiez d'âge mineur lorsque vous êtes apparu dans une vidéo ou sur une image téléchargée ou visible sur Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, or XTube.com, un recours collectif pourrait avoir une incidence sur vos droits

English



NOUVELLES FOURNIES PAR
JND Legal Administration →
Févr 09, 2024, 09:45 ET

SEATTLE, 9 février 2024 /CNW/ - JND Legal Administration

Un recours collectif est en instance devant le Tribunal de district des États-Unis pour le district central de la Californie (le « Tribunal »). La poursuite est connue sous le nom de *Jane Doe c. MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, d/b/a Pornhub, MG Freesites* et

(ADSx). Le Tribunal a décidé que cette poursuite devrait être un recours collectif au nom d'un « groupe » ou d'un groupe de personnes dont vous pourriez faire partie. Vous trouverez ci-dessous un résumé de vos droits et de vos options avant le procès qui se tiendra en août 2024.

Quel est l'objet de cette poursuite?

Le demandeur prétend que MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, d/b/a Pornhub, MG Freesites II, LTD, MG Content RT Limited, et 9219-1568 Québec, Inc. d/b/a MindGeek (appelés collectivement les « défendeurs ») ont systématiquement participé à des activités de trafic sexuel impliquant des dizaines de milliers d'enfants, en recevant, distribuant et profitant d'une foule de documents d'abus sexuels sur les enfants sur les sites Web Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com et XTube.com. Les défendeurs nient tout acte répréhensible. Le Tribunal n'a pas déterminé qui a raison ou qui a tort. Il n'y a pas d'argent disponible actuellement, et il n'y a aucune garantie qu'il y en aura. Cependant, vos droits légaux sont touchés, et vous avez une décision à prendre maintenant.

Est-ce que je fais partie de ce groupe?

Le Tribunal a autorisé un groupe et un sous-groupe California Subclass comme il est décrit ci-dessous.

Groupe : Toutes les personnes qui étaient âgées de moins de 18 ans lorsqu'elles sont apparues dans une vidéo ou une image qui a été téléchargée ou mise autrement à la disposition du public sur tout site Web appartenant à MindGeek ou exploité par celui-ci, y compris Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com et XTube.com, du 19 février 2011 à aujourd'hui.

Sous-groupe California Subclass : Membres du groupe résidant en Californie et qui étaient âgés de moins de 18 ans lorsqu'ils ont figuré dans une vidéo ou une image qui a été téléchargée ou mise autrement à la disposition du public sur tout site Web appartenant à MindGeek ou exploité par cette dernière, y compris Pornhub.com, Pornhubpremium.com, Redtube.com,

ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com et XTube.com, depuis le 19 février 2011.

Quelles sont mes options?

Vous pouvez ne rien faire ou vous exclure.

Ne rien faire : En ne faisant rien, vous conservez la possibilité d'obtenir de l'argent ou des avantages qui pourraient découler d'un procès ou d'un règlement. Mais vous renoncez à tout droit de poursuivre les défendeurs séparément au sujet des mêmes réclamations en justice dans cette poursuite. Vous serez lié par le résultat de cette poursuite.

Demander une exclusion : Si un membre du groupe souhaite être exclu de ce recours collectif, il peut remplir et retourner le formulaire de demande d'exclusion disponible sur **www.MindGeekClassActionLitigation.com**. Si vous demandez à vous soustraire à cette poursuite et que de l'argent ou des avantages sont accordés par la suite, vous **n'aurez pas droit** à ces avantages. Mais vous conservez tout droit de poursuivre les défendeurs séparément au sujet des mêmes réclamations en justice dans le cadre de cette poursuite. Vous **ne serez pas** lié par le résultat de cette poursuite. Le formulaire de demande d'exclusion peut être soumis par voie électronique ou par courrier. Les formulaires électroniques de demande d'exclusion peuvent être envoyés par courriel à **info@MindGeekClassActionLitigation.com** ou en ligne à **www.MindGeekClassActionLitigation.com**. Les formulaires de demande d'exclusion envoyés par la poste doivent être acheminés à : MindGeek Class Action Litigation, c/o JND Legal Administration, Exclusion Requests, P.O. Box 91491, Seattle, WA 98111. La date limite pour soumettre votre formulaire de demande d'exclusion par voie électronique ou par la poste est **le 22 avril 2024**.

Le procès

Un procès doit avoir lieu en août 2024. Le Tribunal a désigné le cabinet d'avocats Susman Godfrey L.L.P. pour représenter les membres du groupe en tant qu'avocat du recours collectif. Vous n'avez pas besoin d'assister au procès. L'avocat du recours collectif présentera l'affaire pour le demandeur et le groupe, et les avocats des défendeurs présenteront l'affaire en leur nom. Vous ou votre avocat êtes les bienvenus et pouvez y assister à vos frais.

Le présent avis est un résumé de la poursuite et de la procédure. Vous pouvez obtenir de plus amples renseignements en visitant www.MindGeekClassCctionLitigation.com, en composant le 844 566-0107, en envoyant un courriel à info@MindGeekClassActionLitigation.com ou en écrivant à l'administrateur à MindGeek Class Action Litigation, a/s JND Legal Administration P.O. Box 91491, Seattle, WA 98111. Vous pouvez également communiquer avec l'avocat du recours collectif au 1 310 789-3100. **Veillez ne pas communiquer avec le Tribunal.**

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SOURCE JND Legal Administration

Wenn Sie minderjährig waren, als Sie in einem Video oder Bild zu sehen waren, das auf Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com oder XTube.com hochgeladen oder angesehen wurde, kann eine Sammelklage Ihre Rechte beeinträchtigen

USA - Deutsch ▾



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JND Legal Administration →
09 Feb, 2024, 09:45 ET

SEATTLE, 9. Februar 2024 /PRNewswire/ -- JND Legal Administration

Case 8:21-cv-00338-WJH-ADS Document 259-7 Filed 02/23/24 Page 19 of 37 Page ID #:16608
Eine Sammelklage ist beim United States District Court for the Central District of California (das „Gericht“) anhängig. Die Klage trägt die Bezeichnung Jane Doe 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, Nr. SACV 21-00338-CJC (ADSx). Das Gericht hat entschieden, dass es sich bei dieser Klage um eine Sammelklage im Namen einer „Sammelklägergruppe“ handeln soll, zu der auch Sie gehören könnten. Im Folgenden finden Sie eine Zusammenfassung Ihrer Rechte und Möglichkeiten vor der anstehenden Verhandlung im August 2024.

Worum geht es in diesem Rechtsstreit?

Der Kläger behauptet, dass MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, d/b/a Pornhub, MG Freesites II, LTD, MG Content RT Limited, und 9219-1568 Quebec, Inc. d/b/a MindGeek (zusammen „Beklagte“) systematisch am Sexhandel mit Zehntausenden von Kindern beteiligt gewesen seien, indem sie massenhaft Material über sexuellen Kindesmissbrauch („CSAM“) auf den Websites Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com und XTube.com erhielten, verbreiteten und davon profitierten. Die Beklagten streiten jegliches Fehlverhalten ab. Das Gericht hat nicht entschieden, wer Recht oder Unrecht hat. Derzeit ist kein Geld verfügbar, und es gibt auch keine Garantie dafür, dass es jemals verfügbar sein wird. Allerdings sind Ihre gesetzlichen Rechte betroffen, und Sie müssen jetzt eine Entscheidung treffen.

Bin ich Teil der Sammelklägergruppe?

Das Gericht bestätigte eine Sammelklägergruppe und eine kalifornische Untergruppe, wie unten beschrieben.

Sammelklägergruppe: Alle Personen, die unter 18 Jahre alt waren, als sie in einem Video oder Bild zu sehen waren, das auf einer Website, die MindGeek gehört oder von MindGeek betrieben wird, hochgeladen oder anderweitig zur Verfügung gestellt wurde, einschließlich Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com und XTube.com, im Zeitraum vom 19. Februar 2011 bis heute.

Case 8:21-cv-00338-WJH-ADS Document 259-7 Filed 02/23/24 Page 20 of 37 Page ID #:16609
Kalifornische Untergruppe. Mitglieder der Sammelklägergruppe mit Wohnsitz in Kalifornien, die unter 18 Jahre alt waren, als sie in einem Video oder Bild zu sehen waren, das auf einer Website, die MindGeek gehört oder von MindGeek betrieben wird, hochgeladen oder anderweitig zur Verfügung gestellt wurde, einschließlich Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com und XTube.com, im Zeitraum vom 19. Februar 2011 bis heute.

Was sind meine Optionen?

Sie können nichts tun oder sich selbst ausschließen.

Nichts tun. Wenn Sie nichts unternehmen, behalten Sie die Möglichkeit, Geld oder Leistungen zu erhalten, die sich aus einem Verfahren oder einem Vergleich ergeben könnten. Sie verzichten jedoch auf das Recht, die Beklagten wegen derselben Rechtsansprüche in diesem Rechtsstreit gesondert zu verklagen. Sie sind an das Ergebnis dieses Rechtsstreits gebunden.

Antrag auf Ausschluss. Wenn ein Mitglied der Sammelklägergruppe von dieser Sammelklage ausgeschlossen werden möchte, kann es das Formular für den Antrag auf Ausschluss aus der Sammelklägergruppe ausfüllen und zurücksenden, das unter **www.MindGeekClassActionLitigation.com** verfügbar ist. Wenn Sie darum bitten, von diesem Rechtsstreit ausgeschlossen zu werden, und Ihnen später Geld oder Leistungen zugesprochen werden, werden Sie nicht an diesen Leistungen beteiligt. Sie behalten jedoch das Recht, die Beklagten wegen derselben Rechtsansprüche in diesem Rechtsstreit gesondert zu verklagen. Sie sind an das Ergebnis dieses Rechtsstreits nicht gebunden. Das Formular für den Ausschlussantrag kann elektronisch oder auf dem Postweg eingereicht werden. Elektronisch übermittelte Ausschlussformulare können per E-Mail an **info@MindGeekClassActionLitigation.com** oder elektronisch über **www.MindGeekClassActionLitigation.com** gesendet werden. Formulare für Ausschlussanträge, die auf dem Postweg verschickt werden, müssen an folgende Adresse geschickt werden: MindGeek Class Action Litigation, c/o JND Legal Administration, Exclusion Requests, P.O. Box 91491, Seattle, WA 98111. Die Frist für die Einreichung des Ausschlussantrags auf elektronischem Wege oder auf dem Postweg ist der **22. April 2024**.

Die Verhandlung.

Case 8:21-cv-00338-WJH-ADS Document 259-7 Filed 02/23/24 Page 21 of 37 Page ID #:16610
Die Verhandlung ist für August 2024 geplant. Das Gericht ernannte die Anwaltskanzlei Susman Godfrey L.L.P. zur Vertretung der Sammelkläger als Sammelrechtsanwalt. Sie müssen nicht an der Verhandlung teilnehmen. Der Anwalt der Sammelkläger wird den Fall für den Kläger und die Sammelklägergruppe vortragen, und die Anwälte der Beklagten werden in deren Namen vortragen. Sie oder Ihr eigener Anwalt können gerne auf eigene Kosten teilnehmen.

Fragen?

Diese Bekanntmachung ist eine Zusammenfassung des Rechtsstreits und des Verfahrens. Weitere Informationen erhalten Sie unter www.MindGeekClassCctionLitigation.com, telefonisch unter 844-566-0107, per E-Mail an info@MindGeekClassActionLitigation.com oder schriftlich an den Verwalter unter MindGeek Class Action Litigation, c/o JND Legal Administration P.O. Box 91491, Seattle, WA 98111. Sie können den Anwalt der Sammelkläger auch telefonisch unter 1-310-789-3100 erreichen. **Bitte wenden Sie sich nicht an das Gericht.**

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Se você era menor de idade quando apareceu em um vídeo ou imagem subido ou visível no Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com ou XTube.com, uma demanda coletiva pode afetar seus direitos

BRAZIL - Portuguese ▾



NOTÍCIAS FORNECIDAS POR
JND Legal Administration →
Fev 09, 2024, 14:45 GMT

SEATTLE, 9 de fevereiro de 2024 /PRNewswire/ -- JND Legal Administration

Uma demanda coletiva está pendente no Tribunal Distrital dos EUA para o Distrito Central da Califórnia (o "Tribunal"). O processo é conhecido como *Jane Doe v. MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, d/b/a Pornhub, MG Freesites II, LTD, MG Content RT Limited e 9219-1568 Quebec, Inc. /a MindGeek*, nº SACV 21-00338-CJC (ADSx). O Tribunal decidiu que este

processo deveria ser uma demanda coletiva em nome de uma "classe" ou grupo de pessoas, que poderia incluir você. Leia abaixo um resumo dos seus direitos e opções antes do próximo julgamento em agosto de 2024.

Do que se trata este processo?

O Demandante alega que MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, d/b/a Pornhub, MG Freesites II, LTD, MG Content RT Limited e 9219-1568 Quebec, Inc. d/b/a MindGeek (coletivamente, "Réus") participaram sistematicamente em empreendimentos de tráfico sexual envolvendo dezenas de milhares de crianças, recebendo, distribuindo e lucrando com grande quantidade de material de abuso sexual infantil ("CSAM") nos sites Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com e XTube.com. Os réus negam qualquer irregularidade. O Tribunal não decidiu quem tem razão ou não. Não há dinheiro disponível agora e nenhuma garantia de que haverá. Contudo, seus direitos legais são afetados e você tem uma escolha a fazer agora.

Sou parte do grupo?

O Tribunal certificou um Grupo e um Subgrupo da Califórnia conforme detalhado abaixo.

Grupo: Todas as pessoas que tinham menos de 18 anos quando apareceram em um vídeo ou imagem que foi subido ou de outro modo disponibilizado para visualização em qualquer site de propriedade ou operado pela MindGeek, incluindo Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com e XTube.com, desde 19 de fevereiro de 2011 até o presente.

Subgrupo Califórnia: Membros do Grupo residentes na Califórnia que tinham menos de 18 anos quando apareceram em um vídeo ou imagem que foi subido ou de outro modo disponibilizado para visualização em qualquer site de propriedade ou operado pela MindGeek, incluindo Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com e XTube.com, desde 19 de fevereiro de 2011 até o presente.

Você pode não fazer nada ou se excluir.

Não fazer nada. Ao não fazer nada, você mantém a possibilidade de obter dinheiro ou benefícios que possam advir de um julgamento ou acordo. Contudo você desiste de qualquer direito de processar os Réus em separado quanto às mesmas reivindicações jurídicas nesta demanda. Você ficará vinculado ao resultado deste processo.

Peça para ser excluído. Se um membro do Grupo desejar ser excluído desta ação coletiva, poderá preencher e devolver o Formulário de Solicitação de Exclusão disponível em www.MindGeekClassActionLitigation.com. Se você pedir para ser excluído deste processo e o dinheiro ou benefícios forem concedidos posteriormente, você não participará destes benefícios. Contudo você mantém quaisquer direitos de processar os Réus em separado quanto às mesmas reivindicações jurídicas nesta demanda. Você não ficará vinculado ao resultado desta demanda. O Formulário de Solicitação de Exclusão pode ser enviado por meio eletrônico ou via correio físico. Os Formulários de Solicitação de Exclusão enviados por meio eletrônico podem ser enviados via e-mail para info@MindGeekClassActionLitigation.com ou eletronicamente através de www.MindGeekClassActionLitigation.com. Os Formulários de Solicitação de Exclusão enviados via correio físico devem ser encaminhados para: MindGeek Class Action Litigation, c/o JND Legal Administration, Exclusion Requests, P.O. Box 91491, Seattle, WA 98111. O prazo final para envio do Formulário de Solicitação de Exclusão por meio eletrônico ou via correio físico é **22 de abril de 2024**.

O julgamento

O julgamento está previsto para agosto de 2024. O Tribunal designou o escritório de advocacia Susman Godfrey L.L.P. para representar os membros do Grupo como Conselho de Classe. Você não precisa comparecer ao julgamento. O Conselho de Classe irá apresentar o caso ao Demandante e ao Grupo, e os advogados dos Réus farão em seu nome. Você ou seu próprio advogado podem vir por sua própria conta.

Perguntas?

Este aviso é um resumo da demanda e dos procedimentos. Você pode obter informações adicionais ao acessar www.MindGeekClassCctionLitigation.com, ligar para 844-566-0107, enviar um e-mail para info@MindGeekClassActionLitigation.com ou escrever ao administrador em MindGeek Class Action Litigation, c/o JND Legal Administration P.O. Box 91491, Seattle, WA 98111. Você também pode ligar ao Conselho de Classe no número 1-310-789-3100. **Não entre em contato com o Tribunal.**

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FONTE JND Legal Administration

Ak ste sa objavili vo videu alebo na obrázku, ktoré boli nahrané alebo sledovateľné na stránkach Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com alebo XTube.com ako nepĺnoletá osoba, môže sa na vaše práva vzťahovať skupinová žaloba

USA - slovenčina ▾



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09 Feb, 2024, 09:45 ET

SEATTLE, 9. februára 2024 /PRNewswire/ -- JND Legal Administration

Case 8:21-cv-00338-WJH-ADS Document 259-7 Filed 02/23/24 Page 27 of 37 Page ID #:16616
Na okresnom súde Spojených štátov amerických pre centrálny okres Kalifornia (ďalej len „súd“) prebieha konanie o skupinovej žalobe. Súdne konanie je známe ako *Jane Doe v. MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, d/b/a Pornhub, MG Freesites II, LTD, MG Content RT Limited a 9219-1568 Quebec, Inc. d/b/a MindGeek*, č. SACV 21-00338-CJC (ADSx). Súd rozhodol, že toto súdne konanie by malo byť skupinovou žalobou v mene „triedy“ alebo skupiny osôb, do ktorej môžete patriť aj vy. Prečítajte si súhrn svojich práv a možností pred nadchádzajúcim súdom, ktorý sa koná v auguste 2024.

O čom je tento súdny spor?

Žalobca tvrdí, že spoločnosti MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, d/b/a Pornhub, MG Freesites II, LTD, MG Content RT Limited a 9219-1568 Quebec, Inc. d/b/a MindGeek (spoločne ako „obžalovaní“) sa systematicky zúčastňovali na obchodovaní so sexom s desiatkami tisíc detí tým, že prijímali, distribuovali a profitovali z množstva materiálov, ktoré predstavujú sexuálne zneužívanie detí („CSAM“) na webových stránkach Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com a XTube.com. Obžalovaní popierajú akékoľvek previnenie. Súd zatiaľ nerozhodol, kto je v práve a kto nie. Aktuálne nie sú k dispozícii žiadne peniaze a nie je zaručené, že budú. Vaše zákonné práva však boli zasiahnuté a máte šancu konať.

Som súčasťou dotknutej skupiny?

Súd certifikoval skupinu a podskupinu v Kalifornii, ako je uvedené nižšie.

Skupina: Všetky osoby, ktoré mali menej ako 18 rokov, keď sa objavili vo videu alebo na obrázku, ktoré boli nahrané alebo inak sprístupnené na prezeranie na akejkoľvek webovej stránke vo vlastníctve alebo v prevádzke spoločnosti MindGeek, vrátane Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com a XTube.com od 19. februára 2011 až do súčasnosti.

Podskupina v Kalifornii: Členovia skupiny s bydliskom v Kalifornii, ktorí mali menej ako 18 rokov, keď sa objavili vo videu alebo na obrázku, ktoré boli nahrané alebo inak sprístupnené na prezeranie na akejkoľvek webovej stránke vo vlastníctve alebo v prevádzke spoločnosti MindGeek, vrátane



YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com a XTube.com od 19. februára 2011 až do súčasnosti.

Aké mám možnosti?

Môžete neurobiť nič, alebo sa zo skupiny vylúčiť.

Neurobíte nič. Ak neurobíte nič, ponecháte si možnosť získať peniaze alebo výhody, ktoré môžu vyplynúť zo súdu alebo vyrovnania. Vzdávate sa však akýchkoľvek práv žalovať obžalovaných samostatne v súvislosti s tými istými právnymi nárokmi, ktoré rieši toto konanie. Bude pre vás záväzný výsledok súdneho konania.

Požiadate o vylúčenie. Ak si člen skupiny želá byť vylúčený z tejto skupinovej žaloby, môže vyplniť a odoslať formulár žiadosti o vylúčenie, dostupný na stránke Form available on **www.MindGeekClassActionLitigation.com**. Ak požiadate o vylúčenie z tohto súdneho konania a neskôr budú priznané peniaze alebo výhody, **nebudete** mať podiel na týchto výhodách. Ponechávate si však akékoľvek práva žalovať obžalovaných samostatne v súvislosti s tými istými právnymi nárokmi, ktoré rieši toto konanie. **Nebude** pre vás záväzný výsledok súdneho konania. Formulár žiadosti o vylúčenie je možné podať elektronicky alebo bežnou poštou. Formulár žiadosti o vylúčenie je možné poslať e-mailom na adresu **info@MindGeekClassActionLitigation.com** alebo elektronicky cez stránku **www.MindGeekClassActionLitigation.com**. Formulár žiadosti o vylúčenie zaslaný bežnou poštou je potrebné zaslať na adresu: MindGeek Class Action Litigation, c/o JND Legal Administration, Exclusion Requests, P.O. Box 91491, Seattle, WA 98111. Termín na podanie formulára žiadosti o vylúčenie elektronicky alebo bežnou poštou je **22. apríl 2024**.

Pojednávanie.

Termín pojednávania je určený na august 2024. Súd poveril advokátsku kanceláriu Susman Godfrey L.L.P., aby zastupovala členov skupiny ako právny zástupca skupiny. Na pojednávaní sa nemusíte zúčastniť. Právny zástupca skupiny predloží prípad žalobcovi a skupine, a právni zástupcovia obžalovaných budú prítomní v ich mene. Vy alebo váš vlastný právny zástupca môžete prísť na vlastné náklady.


Máte otázky?



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Toto oznámenie predstavuje zhrnutie súdnej žaloby a konania. Ďalšie informácie získate na stránke www.MindGeekClassCctionLitigation.com, na telefónnom čísle 844-566-0107, na e-mailovej adrese info@MindGeekClassActionLitigation.com alebo ak napíšete správcovi MindGeek Class Action Litigation, c/o JND Legal Administration P.O. Box 91491, Seattle, WA 98111. Môžete sa tak isto telefonicky obrátiť na právneho zástupcu skupiny na čísle 1-310-789-3100. **Prosíme, aby ste nekontaktovali súd.**

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
Si usted era menor de edad cuando apareció en un video o imagen que se haya cargado o esté disponible en Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, o XTube.com, una demanda colectiva puede afectar sus derechos

MEXICO - Spanish ▾



NOTICIAS PROPORCIONADAS POR
JND Legal Administration →
09 feb, 2024, 14:45 GMT

SEATTLE, 9 de febrero de 2024 /PRNewswire/ -- JND Legal Administration

Una demanda colectiva está en trámite en el Tribunal Federal del Distrito Central de California (el "Tribunal"). La causa se conoce como *Jane Doe c/ MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, bajo el nombre de Pornhub, MG Freesites II, LTD, MG Content RT Limited*, y 

Tribunal ha decidido que la causa deberá ser una demanda colectiva en nombre de una "clase" o grupo de personas. Dentro de este grupo o clase, usted podría estar incluido. A continuación, lea un resumen de sus derechos y de las opciones con las que cuenta antes del juicio que se estará llevando a cabo en agosto del año 2024.

¿De qué se trata la causa?

El demandante alega que MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, con el nombre de Pornhub, MG Freesites II, LTD, MG Content RT Limited, y 9219-1568 Quebec, Inc. con el nombre de MindGeek (colectivamente, los "Demandados") participaron sistemáticamente en empresas de tráfico sexual que implicaban a decenas de miles de niños mediante la recepción, distribución y obtención de beneficios de cantidades de material de abuso sexual infantil ("CSAM", por sus siglas en inglés) en los sitios web Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com y XTube.com. Los Demandados niegan todo tipo de accionar ilegal. El Tribunal no ha decidido qué parte tiene la razón todavía. No hay dinero disponible en este momento y no hay garantía de que estará disponible en un futuro. Sin embargo, sus derechos se encuentran afectados y tiene la opción de decidir qué hacer ahora.

¿Formo parte de la clase?

El Tribunal determinó una Clase y una Subclase para California según se detalla a continuación.

Clase: Todo aquel que sea menor de 18 años y que aparezca en un video o imagen que haya sido subido o puesto a disposición para su visualización en cualquier sitio web que sea propiedad de MindGeek o esté operado por MindGeek, como Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com y XTube.com, desde el 19 de febrero de 2011 hasta la actualidad.

Subclase para California: Los miembros de la Clase que residan en California y que fuesen menores de 18 años al momento de aparecer en un video o imagen que haya sido subido o de alguna otra forma puesto a disposición para su visualización en cualquier sitio web que sea propiedad de

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MindGeek o estén operados por MindGeek, como Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com y XTube.com, desde el 19 de febrero de 2011 hasta la actualidad.

¿Qué puedo hacer?

Puede no hacer nada o excluirse.

No hacer nada. Al no hacer nada, tiene la posibilidad de recibir algún tipo de dinero o beneficio que devenga de un juicio o acuerdo legal. No obstante, usted renuncia a cualquier derecho a demandar a los Demandados por separado sobre los mismos reclamos legales en esta demanda. Se verá afectado por el resultado de esta demanda.

Pedir la exclusión. Si un miembro de la Clase desea quedar excluido de esta demanda colectiva, puede completar y devolver el Formulario de Solicitud de Exclusión que se encuentra disponible en **www.MindGeekClassActionLitigation.com**. Si usted pide quedar excluido del juicio y luego recibe dinero o beneficios, no podrá compartir dichos beneficios. Pero conserva cualquier derecho a interponer una demanda por separado contra los Demandados sobre los mismos reclamos legales en esta demanda. No se verá afectado por el resultado de esta demanda. El Formulario de Solicitud de Exclusión se puede subir de forma electrónica o por correo de forma física. Los formularios que se envíen por medios virtuales se pueden adjuntar por correo al **info@MindGeekClassActionLitigation.com** o subirse a través de **www.MindGeekClassActionLitigation.com**. Los formularios que se envíen de forma física deberán enviarse a la siguiente dirección: MindGeek Class Action Litigation, c/o JND Legal Administration, Exclusion Requests, P.O. Box 91491, Seattle, WA 98111. La fecha límite para subir los formularios de manera física o electrónica es el día **22 de abril de 2024**.

El juicio.

Se espera que el juicio se lleve a cabo en agosto de 2024. El Tribunal designó al estudio de abogados Susman Godfrey L.L.P. para representar a los miembros de la Clase como abogado designado de la clase. No es necesario que asista al juicio. El abogado designado de la clase presentará la causa en nombre del Demandante y de la Clase. Los abogados de la parte demandada lo harán en su nombre. Usted o su abogado pueden asistir por cuenta propia.

Este aviso es un resumen de la demanda y de demás procedimientos legales. Puede obtener información adicional a través de www.MindGeekClassCctionLitigation.com, del número de teléfono 844-566-0107, de la dirección de correo electrónico info@MindGeekClassActionLitigation.com o por escrito dirigiéndose al administrador de la demanda colectiva MindGeek Class Action Litigation, c/o JND Legal Administration P.O. Box 91491, Seattle, WA 98111. También puede llamar al abogado designado de la clase al 1-310-789-3100. **Rogamos que no se ponga en contacto con el tribunal.**

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FUENTE JND Legal Administration

Una demanda puede afectar a sus derechos si era menor cuando apareció en un vídeo en uno de estos sitios web

USA - español ▾



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JND Legal Administration →

09 Feb, 2024, 09:45 ET

- Si era menor de edad cuando apareció en un vídeo o imagen cargado o visible en Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com o XTube.com, una demanda colectiva puede afectar a sus derechos

SEATTLE, 9 de febrero de 2024 /PRNewswire/ -- JND Legal Administration

Una demanda colectiva está pendiente en el Tribunal de Distrito de los Estados Unidos para el Distrito Central de California ("el tribunal"). La demanda se conoce como *Jane Doe contra MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, d/b/a Pornhub, MG Freesites II, LTD, MG Content RT Limited, y 9219-1568 Quebec, Inc. d/b/a MindGeek*, n° SACV 21-00338-CJC (ADSx). El tribunal decidió que esta demanda debía ser una acción colectiva en nombre de una "clase", o grupo de personas, que podría incluirle a usted. Lea a continuación un resumen de sus derechos y opciones antes de un próximo juicio en agosto de 2024.

¿De qué se trata esta demanda?



El demandante alega que MindGeek USA Incorporated, MindGeek S.A.R.L., MG Freesites, LTD, d/b/a Pornhub, MG Freesites II, LTD, MG Content RT Limited, y 9219-1568 Quebec, Inc. d/b/a MindGeek (colectivamente, "los demandados") participaron sistemáticamente en empresas de tráfico sexual que implicaban a decenas de miles de niños al recibir, distribuir y beneficiarse de montones de material de abuso sexual infantil ("CSAM") en los sitios web Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com y XTube.com. Los demandados niegan haber cometido delito alguno. El tribunal no ha decidido quién tiene razón y quién no. No hay dinero disponible ahora, y no hay garantía de que lo habrá. Sin embargo, sus derechos legales se ven afectados, y usted tiene que tomar una decisión ahora.

¿Formo parte de la clase?

El tribunal certificó una clase y una subclase de California como se detalla a continuación.

Clase: Todas las personas que eran menores de 18 años cuando aparecieron en un vídeo o imagen que se haya cargado o puesto a disposición para su visualización en cualquier sitio web propiedad de MindGeek o gestionado por MindGeek, incluidos Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com y XTube.com, desde el 19 de febrero de 2011 hasta la fecha.

Subclase de California: Miembros de la clase residentes en California que eran menores de 18 años cuando aparecieron en un vídeo o imagen que haya sido cargado o puesto a disposición para su visualización en cualquier sitio web propiedad de MindGeek o gestionado por ésta, incluido Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com y XTube.com, desde el 19 de febrero de 2011 hasta la actualidad.

¿Cuáles son mis opciones?

Puede no hacer nada o excluirse.

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No hacer nada. Al no hacer nada, mantiene la posibilidad de obtener dinero o beneficios que puedan derivarse de un juicio o un acuerdo. Pero renuncia a cualquier derecho a demandar a los demandados por separado sobre las mismas reclamaciones legales en esta demanda. Usted quedará vinculado por el resultado de este pleito.

Solicitar su exclusión. Si un miembro de la clase desea ser excluido de esta demanda colectiva, puede rellenar y devolver el Formulario de Solicitud de Exclusión disponible en www.MindGeekClassActionLitigation.com. Si solicita ser excluido de esta demanda y posteriormente se le conceden dinero o beneficios, no participará en dichos beneficios. Pero conservará cualquier derecho a demandar a los demandados por separado sobre las mismas reclamaciones legales en este pleito. Usted no estará obligado por el resultado de este juicio. El formulario de solicitud de exclusión puede enviarse electrónicamente o por correo postal. Los formularios de solicitud de exclusión enviados electrónicamente pueden enviarse por correo electrónico a info@MindGeekClassActionLitigation.com o electrónicamente a través de www.MindGeekClassActionLitigation.com. Los Formularios de Solicitud de Exclusión enviados por correo físico deben remitirse a: MindGeek Class Action Litigation, c/o JND Legal Administration, Exclusion Requests, P.O. Box 91491, Seattle, WA 98111. La fecha límite para enviar su formulario de solicitud de exclusión electrónicamente o por correo físico es el **22 de abril de 2024**.

El juicio

El juicio está programado para agosto de 2024. El tribunal designó al bufete de abogados Susman Godfrey L.L.P. para representar a los miembros del grupo como abogado del grupo. No es necesario que asista al juicio. Los abogados de la clase presentarán el caso para el demandante y la clase, y los abogados de los demandados presentarán en su nombre. Usted o su propio abogado pueden asistir por cuenta propia.

¿Preguntas?

Este aviso es un resumen de la demanda y del procedimiento. Puede obtener información adicional visitando www.MindGeekClassActionLitigation.com, llamando al 844-566-0107, enviando un correo electrónico a info@MindGeekClassActionLitigation.com, o escribiendo al administrador a MindGeek Class Action Litigation, c/o JND Legal Administration P.O. Box 91491, Seattle, WA 98111. También puede llamar al abogado del grupo al 1-310-789-3100. **No se ponga en contacto con el tribunal.**

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- EXHIBIT F -

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

If you were a minor when you appeared in a video or image uploaded or viewable on Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, or XTube.com, a class action lawsuit may affect your rights.

A United States federal court authorized this Notice. This is not a solicitation from a lawyer.

- A lawsuit known as *Jane Doe 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*, No. SACV 21-00338-CJC (ADSx) is pending in the United States District Court for the Central District of California (the “Court”).
- Plaintiff claims that 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 (collectively, “Defendants”) systematically participated in sex-trafficking ventures involving tens of thousands of children by receiving, distributing, and profiting from droves of child sexual abuse material (“CSAM”) on the websites Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com. The allegations against Defendants are set forth in Plaintiffs’ Third Amended Complaint filed with the Court on May 5, 2023.
- The Court has allowed the lawsuit to be a class action on behalf of a Class and a California Subclass as detailed below.

Class: 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 MindGeek, including Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com, from February 19, 2011, through the present.

California Subclass: Members of the Class 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 MindGeek, including Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com from February 19, 2011, through the present.

- The Court has not decided who is right or wrong. There is no money available now, and no guarantee there will be. However, if you are a member of the Classes described above, your legal rights are affected, and you have a choice to make now.

Questions? Visit www.MindGeekClassActionLitigation.com or call toll-free 844-566-0107

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
Do Nothing	Stay in this lawsuit. Await the outcome. Give up certain rights. By doing nothing, you keep the possibility of getting money or benefits that may come from a trial or a settlement. But, you give up any rights to sue Defendants separately about the same legal claims in this lawsuit. You will be bound by the result of this lawsuit.
Ask To Be Excluded by April 22, 2024	Get out of this lawsuit. Get no benefits. Keep your rights to sue. If you wish to be excluded from this class action, fill out and return the Exclusion Request Form available on the website www.MindGeekClassActionLitigation.com . If you ask to be excluded from this lawsuit and money or benefits are later awarded, you will not share in that money or those benefits. But, you keep any rights to sue Defendants separately, at your own expense, and with your own attorney about the same legal claims in this lawsuit, subject to applicable defenses that Defendants may have to each legal claim.

- Plaintiff must prove their claim against Defendants at a trial, which is scheduled for August 2024. If you do not ask to be excluded from the lawsuit and money or benefits are obtained from Defendants, you will be notified about how to ask for a share.

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BASIC INFORMATION

1. What is this Notice about?

This Notice explains that the Court has allowed, or “certified,” a class action lawsuit that may affect you if you were under the age of 18 when you appeared in a video or image that has been uploaded or otherwise made available for viewing on any website owned or operated by MindGeek, including Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com, from February 19, 2011, through the present. The websites owned by MindGeek that are at issue are Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com. You have legal rights and options that you may exercise before the Court holds a trial scheduled for August 2024. The trial will decide whether the claims being made against Defendants, on your behalf, are correct. Judge Cormac J. Carney of the United States District Court for the Central District of California is overseeing this class action. The lawsuit is known as *Jane Doe 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*. No. SACV 21-00338-CJC (ADSx).

2. What is this lawsuit about?

The lawsuit claims that Defendants systematically participated in sex-trafficking ventures involving tens of thousands of children by receiving, distributing, and profiting from droves of child sexual abuse material (“CSAM”). Defendants deny any wrongdoing, and the Court has not found that Defendants have committed wrongdoing.

3. What is a class action and who is involved?

In a class action lawsuit, a court appoints one or more people or entities to be the “plaintiff” to sue on behalf of other people who have similar claims. If the court allows the lawsuit to proceed as a class action, the court appoints the plaintiff as the “class representative.” The people together are a “class” or “class members.” The plaintiff—and all the class members like them—are called the plaintiffs. The companies and people they sued are called the defendants. One court resolves the issues for everyone in the class—except for those people who choose to exclude themselves from the class. In this lawsuit, the Court appointed Jane Doe as Plaintiff and class representative.

4. Why is this lawsuit a class action?

The Court decided that this lawsuit can be a class action and move towards a trial because it meets the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal courts. Specifically, the Court found that:

- There are numerous Class Members whose interests are affected by this lawsuit;
- There are legal questions and facts that are common to the members of the Class;
- Plaintiff’s claims are typical of the claims of the rest of the Class;
- Plaintiff and the lawyers representing the Class will fairly and adequately represent the Class interests;
- The common legal questions and facts are more important than questions that affect only individuals;
- The Class is ascertainable because they are defined by identifiable objective criteria; and
- This class action will be more efficient than having many individual lawsuits.

More information about why the Court is allowing this lawsuit to be a class action is in the Court’s Order Granting Motion for Class Certification, which is available at www.MindGeekClassActionLitigation.com.

THE CLAIMS IN THE LAWSUIT

5. What does the lawsuit complain about?

The lawsuit claims that Defendants facilitate and profit from child sex trafficking involving CSAM; and have known about, and been investigated for, significant amounts of CSAM on their sites. Plaintiff alleges that Defendants, despite their actual knowledge that their sites were being used to share CSAM, did not take adequate steps to curb its propagation, motivated at least in part by financial considerations.

Defendants are a group of privately held companies that operate Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com. Their “flagship video sharing platform is Pornhub. Created in 2007, Pornhub is a leading free, ad-supported, adult content hosting and streaming website, offering visitors the ability to view content uploaded by verified users, models, and third-party adult entertainment companies.”

6. How do Defendants answer?

Defendants deny that they did anything wrong and will defend themselves at trial. Defendants’ Answers to the Complaint are available at www.MindGeekClassActionLitigation.com.

7. Has the Court decided who is right?

The Court has not decided whether Plaintiff or Defendants are correct. By establishing the Class and issuing this Notice, the Court is not suggesting that Plaintiff will win or lose this case. The parties have a chance to prove or disprove their claims and/or defenses through motion practice. Plaintiff must prove their claims at the trial scheduled for August 2024. (See “The Trial” below on page 7.)

8. What is Plaintiff asking for?

Plaintiff is asking for damages sustained as a result of Defendants’ alleged wrongdoing, in the amount to be proven at trial. Plaintiff also seeks injunctive or equitable relief as the Court may deem just and proper, and reasonable cost and expenses incurred, including counsel fees and expert fees.

9. Is there any money available now?

No money or benefits are available now as a result of the Class being certified because the Court has not yet decided whether Defendants did anything wrong, and the two sides have not settled the case. There is no guarantee that money or benefits ever will be obtained. If they are, you will be notified about how to ask for a share.

WHO IS IN THE CLASS

10. Am I part of the Class?

The Court certified a Class and a California Subclass:

1. **Class:** 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 MindGeek, including Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com, from February 19, 2011, through the present.
2. **California Subclass:** Members of the Class 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 MindGeek, including Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com, from February 19, 2011, through the present.

11. I am still not sure if I am included.

If you are still not sure whether you are included in the Class, you can get free help at www.MindGeekClassActionLitigation.com, or by calling or writing to the lawyers in this case, at the phone number or address listed in Question 15.

YOUR RIGHTS AND OPTIONS

You must decide whether to stay in the Class (and be bound by the results) or ask to be excluded (and keep your right to sue Defendants in your own separate lawsuit).

12. What happens if I do nothing at all?

You do not have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit. By doing nothing you are staying in the Class. If you stay and Plaintiff obtains money or benefits, either as a result of the trial or a settlement, you will be notified about how to apply for a share. Keep in mind that if you do nothing now, regardless of whether Plaintiff wins or loses the trial, you will not be able to sue, or continue to sue Defendants—as part of any other lawsuit—about the same legal claims that are the subject of this lawsuit. You will also be legally bound by all of the Orders the Court issues and judgments the Court makes in this class action.

13. Why would I ask to be excluded?

If you want to sue Defendants on your own regarding the same claims in this matter, or already have your own lawsuit against Defendants regarding the same claims in this matter and want to continue with it, you need to ask to be excluded from the Class. If you exclude or remove yourself from the Class— sometimes called “opting-out” of the Class— you will not get any money or benefits from this lawsuit even if Plaintiff wins at trial. However, you may then be able to sue or continue to sue Defendants on your own for the same or similar claims in this matter. If you exclude yourself, you will not be legally bound by the Court’s judgments in this class action.

If you start your own lawsuit or continue with a preexisting lawsuit against Defendants regarding the same claims in this matter after you exclude yourself, you will have to hire your own lawyer(s) for that lawsuit, and you will have to prove your claims. If you do exclude yourself so you can start or continue your own lawsuit against Defendants, you should talk to your own lawyer soon, because *your claims may be subject to a statute of limitations or repose*, meaning that you may face a deadline after which you cannot sue.

14. How do I ask the Court to exclude me from the Class?

To ask to be excluded from the Class, you must submit the Exclusion Request Form available on the website www.MindGeekClassActionLitigation.com . Your Exclusion Request Form may be submitted electronically or through physical mail. Exclusion Request Forms sent electronically may be sent by email to info@MindGeekClassActionLitigation.com or electronically through www.MindGeekClassActionLitigation.com. Exclusion Request Forms sent by physical mail must be mailed to: MindGeek Class Action Litigation, c/o JND Legal Administration, Exclusion Requests, P.O. Box 91491, Seattle, WA 98111. The deadline to submit your Exclusion Request Form electronically or by physical mail is April 22, 2024.

IF YOU DO NOT EXCLUDE YOURSELF BY APRIL 22, 2024, YOU WILL REMAIN PART OF THE CLASS AND BE BOUND BY THE ORDERS OF THE COURT IN THIS LAWSUIT.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

The Court decided that the law firm of Susman Godfrey L.L.P. is qualified to represent you and all Class Members as “Class Counsel.”

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16. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you can hire your own lawyer at your own expense. For example, you can ask them to appear in Court for you if you want someone other than Class Counsel to speak for you.

17. How will the lawyers be paid?

If Class Counsel get money or benefits for the Class, they may ask the Court for an award of fees and expenses. You will not have to personally pay these fees and expenses. If the Court grants Class Counsels’ request, the fees and expenses would be either deducted from any money obtained for the Class or paid separately by Defendants.

THE TRIAL

18. How and when will the Court decide who is right?

Class Counsel will have to prove Plaintiff’s claims at a trial. The trial has been scheduled for August 2024 at the United States District Court for the Central District of California, courtroom of the Honorable Judge Cormac J. Carney, United States District Judge, Courtroom 9B – 9th Floor, 411 West Fourth Street, Santa Ana, CA 92701. During the trial, a Jury and the Judge will hear all of the evidence to help them reach a decision about whether Plaintiff or Defendants are right about the claims in the lawsuit. There is no guarantee that Plaintiff will win, or that they will get any money for the Class.

19. Do I have to come to the trial?

No. You do not need to attend the trial. Class Counsel will present the case for Plaintiff and the Class, and lawyers for the Defendants will present on their behalf. You or your own lawyer are welcome to come at your own expense.

20. Will I get money after the trial?

If Plaintiff obtains money or benefits as a result of the lawsuit, and you remain in the Class, you will be notified about how to participate. We do not know how long this will take.

GETTING MORE INFORMATION

21. How do I get more information?

This Notice contains a summary of the lawsuit and the proceedings. You can get additional information by visiting www.MindGeekClassActionLitigation.com, calling 844-566-0107, emailing info@MindGeekClassActionLitigation.com, or writing the Administrator at:

MindGeek Class Action Litigation
c/o JND Legal Administration
P.O. Box 91491
Seattle, WA 98111

You can also call Class Counsel at 1-310-789-3100, or write them at:

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1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE