FILED
SAN MATEO COUNTY
AUG 14 2020
Clerk of the Superior Court
By _____ DEPUTY CLERK

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN MATEO

SELENA SCOLA, ERIN ELDER, GABRIEL RAMOS, APRIL HUTCHINS, ALLISON TREBACZ, JESSICA SWARNER, and GREGORY SHULMAN, individually and on behalf of all others similarly situated, *Plaintiffs*, v. **FACEBOOK, INC.,** *Defendant.*	Civil Action No. 18CIV05135 **[~~PROPOSED~~] ORDER GRANTING (1) PRELIMINARY APPROVAL OF SETTLEMENT; (2) PROVISIONAL CERTIFICATION OF SETTLEMENT CLASS; (3) APPOINTMENT OF CLASS COUNSEL; (4) APPROVAL OF NOTICE PLAN; and (5) APPROVAL OF SETTLEMENT ADMINISTRATOR** Assigned for All Purposes to Hon. V. Raymond Swope, Dept. 23 Trial Date: None Set Complaint Filed: September 21, 2018

This matter came for hearing on August 7, 2020 in Department 23 of the above-captioned Court on Plaintiff's Motion for (1) Preliminary Approval of Settlement; (2) Provisional Certification of Settlement Class; (3) Appointment of Class Counsel; (4) Approval of Notice Plan; and (5) Approval of Settlement Administrator.

This Court, having fully reviewed the motion, the memorandum of points and authorities in support thereof, the Declarations of Dr. Patricia Watson, Dr. Sonya Norman, Daniel Charest, Steven Williams, the Honorable Rebecca Westerfield (Ret.), and Elizabeth Enlund of proposed claims administrator Epiq Class Action and Claims Solutions, Inc., the Settlement Agreement and Release and its appendix (the "Settlement Agreement"), the proposed short form notice to the proposed settlement class attached hereto as **Exhibit 1**and long-form notice to the proposed settlement class attached hereto as **Exhibit** 2 (the "Notices"), the language of the proposed Claim Form, having carefully analyzed the Settlement Agreement and the Notices, and in recognition of this Court's duty to make a preliminary determination as to the reasonableness of any proposed class action settlement, and if preliminarily determined to be reasonable, to ensure proper notice is provided to all Class Members in accordance with due process requirements, and to set a Final Approval Hearing to consider the proposed Settlement as to the good faith, fairness, adequacy, and reasonableness of any proposed Settlement, THIS COURT HEREBY MAKES THE FOLLOWING DETERMINATIONS AND ORDERS:

This Court grants preliminary approval of the Settlement as set forth in the Settlement Agreement and finds the terms to be within the range of reasonableness of a settlement that ultimately could be granted approval by this Court at the final fairness hearing. For purposes of the settlement, this Court finds that the proposed settlement class is ascertainable and that there is a sufficiently well-defined community of interest among the members of the proposed class in questions of law and fact. Therefore, for settlement purposes only, this Court grants conditional certification of the following settlement class (the "Class"):

> All Content Moderators who performed work for Facebook in California, Arizona, Texas, or Florida as an employee or subcontractor of one or more of the Facebook Vendors from September 15, 2015 to the date of Preliminary Approval of the Settlement.

1. For purposes of settlement, this Court further designates named Plaintiffs Selena Scola, Erin Elder, Gabriel Ramos, April Hutchins, Konica Ritchie, Allison Trebacz, Jessica Swarner, and Gregory Shulman as Class Representatives and the Joseph Saveri Law Firm, Inc. and Burns Charest LLP as Class Counsel.

2. This Court confirms Epiq Class Action & Claims Solutions, Inc., as the Settlement Administrator for purposes of providing notice and administering the claims process.

3. A final fairness hearing on the question of whether the Settlement should be finally approved as fair, reasonable, and adequate as to the members of the Class is scheduled in Department 23 of this Court, located at 400 County Center, Redwood City, California 94063 on November 20, 2020 at 9:00 a.m.

4. At the final fairness hearing, this Court will consider: (a) whether the Settlement should be approved as fair, reasonable, and adequate for the Class; (b) whether a judgment granting approval of the Settlement should be entered; and (c) whether Plaintiffs' application for an award of attorneys' fees, reimbursement of litigation expenses, and class representative service awards should be granted.

5. Counsel for all parties shall file memoranda, declarations, or other statements and materials in support of their request for final approval by no later than 14 days following the deadline for Class Members to object to the Settlement or request exclusion from the Class.

6. Class Counsel shall file a motion for an award of attorneys' fees, reimbursement of litigation expenses, and class representative service awards by no later than 14 days before the deadline for Class Members to object to the Settlement or request exclusion from the Class.

7. This Court approves the Notices and the Claim Form, which are attached to the Declaration of Steven N. Williams in Support of Plaintiffs' Motion for (1) Preliminary Approval of Settlement; (2) Provisional Certification of Settlement Class; (3) Appointment of Class Counsel; (4) Approval of Notice Plan; (5) Approval of Settlement Administrator; and (6) Approval of *Belaire* Notice as Exhibits 2–4. The Settlement Administrator may alter the layout and add dates and contact information, but may not change the other content of the Notices.

8. This Court directs that by September 9, 2020 an e-mail short-form notice be provided to each Class Member for whom Facebook's vendors have an e-mail address. This Court further directs

that by September 23, 2020 a postcard short-form notice be provided to Class Members for whom Facebook's vendors do not have an e-mail address and also to any Class Members where the e-mail short-form notice provided has bounced back or has been returned as undeliverable; for those Class Members postcards will be sent to the last known mailing address reflected in the vendors' systems as updated through the National Change of Address ("NCOA") database. The e-mail and postcard notices will provide a link to, or the website address of, the Settlement Website and will provide a telephone number that Class Members can call for information about the Settlement.

9. This Court further directs that the Settlement Administrators publish the long-form notice through the creation of a Settlement Website, which will be maintained by the Settlement Administrators in the period beginning three (3) business days before postcard and e-mail notice is first disseminated and ending thirty (30) days after the later of (a) the expiration date of any checks for Residual Distributions; and (b) the expiration date of any checks for Other Damages Payments or, if no such checks are mailed, 120 days after any electronic transfers of Other Damages Payments. The Settlement Website will (a) notify Class Members of their rights to object to the Settlement or to opt out of the Class; (b) notify Class Members that no further notice will be provided to them that the Settlement has been approved; (c) inform Class Members that they should monitor the Settlement Website for further developments; (d) inform Class Members of their right to attend the fairness hearing conducted by this Court; (e) inform Class Members of how to participate in any future Court proceedings in this case, including (i) through the use of Zoom for participation at the final approval hearing and (ii) reference to Covid-19 Order Number 11 (https://www.sanmateocourt.org/documents/court_news_and_notices/080520a.pdf) for any class member who wishes to participate in person at the final approval hearing, as well as any future orders governing participation in court proceedings by class members and the public; (f) include any motion(s) made by Class Counsel for any attorneys' fees award and/or any class representative service awards; (g) include a copy of the Second Amended Complaint, the Settlement Agreement, the long-form notice, the claim form, and this Order; and (h) include any other information or materials that this Court may require in the future.

10. This Court further directs that the Settlement Administrators establish a phone line that Class Members can call for answers to questions about the Settlement. The telephone line shall be maintained by the Settlement Administrators in the period beginning three (3) business days before e-mail and postcard is first disseminated until one year after the Effective Date of the Settlement.

11. The proposed members of the Class shall have up to and including October 23, 2020 to object or request exclusion from the Settlement (the "Objection/Exclusion Deadline").

12. This Court finds that the forms of notice to the Settlement Class regarding the pendency of the action and of this Settlement and the methods of giving notice to the members of the Settlement Class constitute the best notice practicable under the circumstances and constitute valid, due, and sufficient notice to all members of the Settlement Class. They comply fully with the requirements of California Code of Civil Procedure section 382, California Civil Code section 1781, California Rules of Court 3.766 and 3.769, the California and United States Constitutions, and all other applicable law.

13. This Court further approves the procedures for Class Members to participate in, opt out of, or object to the Settlement, as set forth in the Settlement Agreement.

14. Class Members who wish to object to the Settlement must submit an objection to the Settlement Administrators. The objection must (a) be made in writing; (b) be filed with this Court; (c) be mailed to the Settlement Administrators (i) at the address provided in the Notice, (ii) with copies to Class Counsel and Defense Counsel, and (iii) postmarked no later than the Objection/Exclusion Deadline; and (d) include the following: (i) the name of this action; (ii) the objector's full name, address, and telephone number; (iii) all grounds for the objection, accompanied by any legal and factual support (including copies of any documents relied upon); (iv) whether the objector is represented by counsel and, if so, the identity of such counsel; (v) a statement confirming whether the objector intends personally to appear and/or testify at the fairness hearing; (vi) the identity of any counsel who will appear at the fairness hearing on the objector's behalf; (vii) a list of any witnesses the objector wishes to call to testify and of any documents or exhibits the objector or the objector's counsel may use at the fairness hearing; and (viii) the objector's signature. Any party shall have 14 days from the Objection/Exclusion Deadline to file a response to any objections.

15. Class Members who wish to exclude themselves from the Settlement (to "opt out" of the Settlement) must submit to the Settlement Administrator, on or before the Objection/Exclusion Deadline a request to "opt out" or be "excluded" from the Settlement Class. The request may be submitted by U.S. Mail only. In order to be effective, the request must be (a) signed by the Person making the request; and (b) postmarked on or before the Objection/Exclusion Deadline. Class Members must complete, sign, date, and timely return a request for exclusion to the Settlement Administrator to exclude themselves from Settlement (an "Exclusion Request"). The Exclusion Request must set forth the Class Member's name, address, and state that the Class Member requests to be excluded from the class. Each Exclusion Request shall be made individually by the Person requesting the opt-out or exclusion; no generic or "class" opt-outs shall be allowed. A Class Member who does not complete and submit a valid and timely Exclusion Request in the manner and by the deadline specified above will remain a Class Member and, if the Court approves the Settlement, will be bound by all the terms and conditions of the Settlement and by the final judgment in this matter. A Class Member who timely submits a valid Exclusion Request will not participate in, or be bound by, the Settlement or the final judgment in any respect and will not receive any payment under the Settlement. To be valid, an Exclusion Request must be completed in full, signed, and returned to the Settlement Administrator by the Objection/Exclusion Deadline. The Settlement Administrator will provide all counsel and this Court with the names of the Class Members who have submitted Exclusion Requests.

16. The procedures and requirements for filing objections in connection with the fairness hearing are intended to ensure the efficient administration of justice and the orderly presentation of any Class Member's objection to the Settlement Agreement, in accordance with the due process rights of all Class Members.

17. Pending the fairness hearing, all proceedings in this action, other than proceedings necessary to carry out or enforce the terms and conditions of the Settlement Agreement and this Order, are stayed.

18. Counsel for the parties are hereby authorized to use all reasonable procedures in connection with the administration of the Settlement that are not materially inconsistent with either this Order or the terms of the Settlement Agreement.

19. This Court orders the following schedule for further proceedings.

Event	Proposed Deadline
Settlement website and phone line activated	September 6, 2020
Notice campaign to begin, including website, mailing, and digital notice	September 9, 2020
Postcard notice deadline	September 23, 2020
Last day to file motion for attorneys' fees, costs, reimbursement of expenses, and service awards	October 9, 2020
Last day for Class members to object to and/or request exclusion from the Class	October 23, 2020
Last day for Plaintiffs to file motion in support of final approval of the Settlement and to respond to Objections	November 6, 2020
Fairness hearing	November 20, 2020 at 9:00 a.m.

20. The fairness hearing date and time and the related prior deadlines set forth above may, from time to time and without further notice to the Settlement Class (except those who have filed timely and valid objections), be continued or adjourned by Order of this Court.

IT IS SO ORDERED.

Dated: AUG 14 2020

Hon. W. Raymond Swope
Judge of the Superior Court

Exhibit 1

SUMMARY NOTICE OF PROPOSED CLASS ACTION

Selena Scola, et al. v. Facebook, Inc.
Superior Court of the State of California, County of San Mateo
Case No. 18-civ-05135

You have been identified as a current or former content moderator who performed work for Facebook, Inc. ("Facebook") in California, Arizona, Texas, or Florida as an employee or subcontractor of one or more Facebook vendors between September 15, 2015 and [date of preliminary approval]. This notifies you of a proposed settlement of a class action filed against Facebook asserting claims related to the content viewed while performing content moderation services.

The Superior Court of the State of California, County of San Mateo, ordered that this notice be sent to certain current and former content moderators. This notice is not a solicitation from a lawyer, and you are not being sued.

The settlement encompasses all claims asserted by Plaintiffs in the lawsuit on behalf of themselves and the proposed Class. The settlement provides for payment of $52 million by Facebook, from which each Class member will receive an automatic payment that can be used for medical screening. In addition, each Class member may seek other payments for treatment of a qualifying diagnosis and for additional damages. Facebook also will implement significant reforms addressing the unsafe workplace practices challenged in this action, including: (1) requiring all U.S. Facebook vendors to provide on-site coaching and standardized resiliency measures to all U.S. content moderators and (2) implementing tooling enhancements designed to mitigate the effects of exposure to graphic and objectionable material.

If you are a Class Member, you have several options. You may:

a. Participate in the settlement and receive the benefits of the settlement, in which case no action is required by you at this time;

b. Object to the settlement by filing and serving an objection by October 23, 2020; or

c. Request to be excluded from the settlement by submitting a request to be excluded by October 23, 2020.

Each of these options is discussed in more detail in the full-length class notice, which you can read at www.contentmoderatorsettlement.com. You can request that a copy of the full-length class notice be mailed to you by contacting the Claims Administrator at [Claims Administrator contact info].

PLEASE DO NOT CONTACT THE COURT.

Exhibit 2

NOTICE OF PROPOSED CLASS ACTION

Selena Scola, et al. v. Facebook, Inc.
Superior Court of the State of California, County of San Mateo
Case No. 18-civ-05135

You have been identified as a current or former content moderator who performed work for Facebook, Inc. ("Facebook") in California, Arizona, Texas, or Florida as an employee or subcontractor of one or more of Facebook's Vendors between September 15, 2015 and [date of preliminary approval]. There is a proposed settlement of a class action filed against Facebook asserting claims related to injuries allegedly caused by viewing graphic and objectionable content while performing content moderation services for Facebook's Vendors.

The Superior Court of the State of California, County of San Mateo, ordered that this notice be sent to certain current and former content moderators to notify them of a proposed settlement of a class action lawsuit. This notice is not a solicitation from a lawyer, and you are not being sued.

Your legal rights are affected by the settlement, so please read this notice carefully.

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1. What is this lawsuit about?

Plaintiffs Selena Scola, Erin Elder, Gabriel Ramos, April Hutchins, Konica Ritchie, Allison Trebacz, Jessica Swarner, and Gregory Shulman ("Plaintiffs") brought this action on behalf of current and former Content Moderators who performed work for Facebook in California, Arizona, Texas, or Florida as an employee or subcontractor of one or more of Facebook's Vendors between September 15, 2015 and [date of preliminary approval] (the "Class"). For purposes of this settlement, "Content Moderator" means an individual who works in a group that reviews user-generated content posted to Facebook platforms to determine whether, or to train Artificial Intelligence to determine whether, such material violates Facebook's Community Standards. "Facebook Vendor" means a vendor or subcontractor with whom Facebook has contracted to provide Content Moderator services and who (a) directly employed an individual as a Content Moderator; or (b) subcontracted with an individual to provide services as a Content Moderator

Plaintiffs allege that Facebook failed to provide a safe work environment for Content Moderators, many of whom view and flag for removal graphic and objectionable material in order to make Facebook safe for the public. Plaintiffs allege that, as a result of repeated viewing of that material, Class Members were subjected to an increased risk of suffering trauma-related injuries and that they suffered bodily injuries.

The settlement includes all claims asserted by the Plaintiffs in the lawsuit on behalf of themselves and the proposed Class. As detailed below, the settlement provides for payment of $52 million by Facebook, from which each Class Member will receive an automatic payment that may be used for medical screening and general damages for their exposure to potentially traumatic material. In addition, each Class member may seek other payments for treatment of a qualifying diagnosis and other damages. Facebook also will implement significant reforms addressing the workplace practices challenged in this action, including: (1) requiring all U.S. Facebook Vendors to provide on-site coaching and standardized resiliency measures to all U.S. Content Moderators and (2) implementing tooling enhancements that mitigate the harmful effects of exposure to graphic or disturbing material.

2. What is a class action?

In a class action lawsuit, one or more people called "Class Representatives" (in this case, Plaintiffs Scola, Elder, Ramos, Hutchins, Ritchie, Trebacz, Swarner, and Shulman) sue on behalf of other people ("Class Members") who allegedly have similar claims. If a court approves of the case proceeding as a "class action," that court decides the lawsuit for all Class Members.

In this case, the Class Representatives and Facebook reached a settlement, subject to Court approval, to agree to a class action for purposes of settlement. The Court certified the case as a class action solely for purposes of deciding whether to approve the settlement. If the settlement is

not approved by the Court, the Class Members will not get the benefits of this settlement, and the Plaintiffs will go back to court to continue their case.

3. Why is there a settlement?

The settlement was reached through extensive arms'-length negotiations between experienced attorneys for Plaintiffs and for Facebook. The attorneys' discussions were facilitated by a retired judge. Plaintiffs also retained two highly credentialed experts and worked closely with them to understand issues related to the diagnosis and treatment of trauma-related injuries and the safeguards needed to mitigate future harm. All parties believe that their respective interests are best served by entering into this settlement, particularly given the risks inherent in complex class action litigation and the time it would take to bring the litigation to a conclusion.

Facebook denies that it has done anything wrong, while the Class Representatives believe that they would prevail if the case went to trial. In the interests of efficiency and avoiding substantial litigation costs, the parties decided to resolve the case through settlement. In this way, the parties avoid the costs and risks of litigation and trial.

In determining whether to approve the settlement, the Court will not decide who is right or wrong. Instead, it will determine whether the settlement is fair, reasonable, and adequate under the circumstances. If the Court approves the settlement as fair, reasonable, and adequate, it will enter a judgment extinguishing all claims of those represented in the lawsuit.

4. Why did I receive this notice?

You received this notice because employment records show that you may be a "Class Member"—meaning you were identified as a current or former Content Moderator who performed work for Facebook in California, Arizona, Texas, or Florida as an employee or subcontractor of one or more of Facebook's Vendors between September 15, 2015 and [date of preliminary approval]. This notice lets you know how you can participate in or exclude yourself from this settlement.

5. How do I know if I am part of the settlement?

You are a Class Member if you are a current or former Content Moderator who performed work for Facebook in California, Arizona, Texas, or Florida as an employee or subcontractor of one or more of Facebook's Vendors between September 15, 2015 and [date of preliminary approval]. Facebook contracted with third-party vendors to manage most of its content moderation operations and only individuals who were employed at or worked as a subcontractor for one of those vendors are part of the Class.

6. If I am part of the settlement, what are my options?

If you are a Class Member, you have several options. You may:

a. Participate in the settlement and receive the benefits of the settlement (see Section 8 below);

b. Object to the settlement by filing and serving an objection by October 23, 2020 (see Sections 9–11 below); or

c. Request to be excluded from the settlement by submitting a request to be excluded by October 23, 2020 (see Section 14 below).

7. How do I participate in the settlement if it is approved by the Court?

If you want to participate in the settlement, you do not need to do anything at this time. If the settlement receives final approval, you will be sent a $1,000 payment and potentially benefit from the practice and tooling enhancements discussed in Section 8 below.

If you are diagnosed with a qualifying diagnosis, you may receive further benefits by submitting documentation of the diagnosis and of other damages you may have suffered.

8. If I participate in the settlement, what will I receive?

The settlement provides both monetary payments and practice and tooling enhancements to reduce the risks of exposure to graphic or disturbing material. The following is a summary of the settlement benefits. For a complete description of the settlement and what it obligates the parties to do, you can read the full Settlement Agreement at www.contentmoderatorsettlement.com.

Monetary Payments

Facebook has agreed to deposit $52 million into a settlement fund as compensation for the release of the Class's claims. That payment will also cover any award for attorneys' fees and expenses, service awards to the class representatives, and settlement administration costs.

All Class Members will receive a single payment of $1,000 that may, but is not required to, be used for medical diagnostic screenings. In exchange, all Class Members will give Facebook a release of claims relating to the conduct alleged in this lawsuit for injunctive relief, medical monitoring costs, and medical treatment costs, as well as the right to assert claims for other damages on behalf of a class or other aggregated basis.

If a Class Member submits documentation that a licensed medical provider has diagnosed the Class Member with a qualifying diagnosis, such as post-traumatic stress disorder, the Class Member will receive a further payment for treatment. **TO RECEIVE ANY FURTHER PAYMENTS, THE CLASS MEMBER MUST SUBMIT EVIDENCE OF A QUALIFYING DIAGNOSIS.** The payments associated with treatment will be tiered to reflect the expense required to treat various types of conditions.

Class Members diagnosed with a qualifying diagnosis will also have the option to submit a claim for a further payment for damages for injuries they contend were caused by content moderation

work they performed for Facebook. In exchange, these Class Members will give Facebook a full release of all claims relating to the conduct alleged in this lawsuit. **TO RECEIVE A PAYMENT FOR OTHER DAMAGES, THE CLASS MEMBER MUST SUBMIT A CLAIM.** Class Members will receive payments in one of four amounts; these amounts will reflect the amount of money remaining in the settlement fund, the extent of damages alleged, and the strength of supporting documentation submitted. These payments are capped at $50,000.

If any money remains in the settlement fund, every Class Member will receive an equal portion of the remaining funds (unless the amount of each payment would be less than $50). Cashing a check or retaining electronic payment of any portion of the remaining funds will constitute acceptance by the Class Member of the amount provided in exchange for a full release of all claims relating to the conduct alleged in this lawsuit. If any money remains after this final distribution to Class Members, it will be donated to the International Society for Traumatic Stress Studies, an organization that researches and advocates around issues of traumatic stress.

Class Members who do not submit claims for damages based on a qualifying diagnosis will retain the right to bring individual claims for other damages in a streamlined arbitration, but will waive the ability to bring those claims on a class or aggregated basis or in court. All Class Members may opt out of the settlement and preserve their right to present any and all of their claims in court.

Practice and Tooling Enhancements

Although Facebook denies Plaintiffs' allegations and denies that its conduct is unlawful, the parties also have agreed that Facebook will implement certain policies and procedures designed to benefit Content Moderators. These policies and procedures are based on industry best practices for content moderation and were developed in consultation with experts hired by Plaintiffs. Among other things, Facebook has agreed to require its U.S. Facebook Vendors to implement the following business practice enhancements:

- Retain clinicians who are licensed, certified, experienced in mental health counseling, and familiar with symptoms of and DSM-5 Criteria for Post-Traumatic Stress Disorder ("PTSD");

- Make these clinicians available during every shift that Content Moderators who are regularly exposed to graphic and objectionable content are working;

- Hold group wellness sessions on a monthly basis;

- Make available weekly one-on-one coaching or wellness sessions for Content Moderators regularly exposed to graphic and objectionable content;

- Provide Content Moderators with clear guidelines for how and when they may remove themselves from specific tasks involving graphic and objectionable content;

- Provide Content Moderators with information about these practice enhancements, as well as a telephone hotline number where compliance concerns can be reported directly to Facebook.

In addition, Facebook will implement standardized resiliency requirements across all of its contracts with its U.S. Vendors and will subject the Vendors to both formal audits and unannounced on-site compliance reviews. Facebook has agreed to make reasonable commercial efforts to ensure that its U.S. Vendors provide these practice enhancements to Content Moderators.

Facebook also will continue to roll out a suite of Well-Being Preference tools on the Single Review Tool platform used by Content Moderators. This will allow Content Moderators to change default settings that may mitigate their exposure to graphic and objectionable material, including:

- Viewing images in black and white;
- Blurring images;
- Blocking faces within images;
- Blurring video previews;
- Auto-muting videos on start;
- Previewing videos using thumbnail images when technically feasible; and
- Preventing automatic video playback.

These practice and tooling enhancements have been designed to help protect Content Moderators from the most harmful effects of exposure to graphic or disturbing material. Two nationally recognized experts in post-traumatic stress provided input into these measures and believe that the measures will benefit Content Moderators during their work.

9. How do I object to the settlement?

If you disagree with the settlement, you have the right to file an objection for the Court to consider. The objection must be in writing and include the following information:

- Your name, current address, and current telephone number;
- The name of the case: *Scola, et al. v. Facebook*, Case No. 18-civ-05135;
- What your objection is and any reasons supporting your position;
- Whether you are represented by counsel and, if so, your counsel's identity;
- A statement confirming whether you or your counsel intend to appear or testify at the final approval hearing;
- A list of any witnesses or exhibits you wish to present at the final approval hearing; and
- Your signature (even if you are represented by counsel).

No later than October 23, 2020, any objections must be filed with the Court at the following address:

Superior Court for the State of California, County of San Mateo
400 County Center
Redwood City, CA 94063.

You must also send a copy of the written statement, via First Class U.S. mail and postmarked by October 23, 2020, to each of the people listed below:

Class Counsel:

Joseph R. Saveri
Steven N. Williams
Kevin Rayhill
Kyle Quackenbush
JOSEPH SAVERI LAW FIRM, INC.
601 California Street, Suite 1000
San Francisco, CA 94108

Korey A. Nelson
Lydia A. Wright
Amanda Klevorn
BURNS CHAREST LLP
365 Canal Street, Suite 1170
New Orleans, LA 70130

Warren Burns
Daniel Charest
Kyle Oxford
BURNS CHAREST LLP
900 Jackson St., Suite 500
Dallas, Texas 75202

William Most
LAW OFFICE OF WILLIAM MOST
201 St. Charles Ave. Suite 114 #101
New Orleans, LA 70170

Facebook Inc.'s Counsel:

Emily Johnson Henn
Megan L. Rodgers
Kathryn E. Cahoy
COVINGTON & BURLING LLP
3000 El Camino Real

5 Palo Alto Square, 10th Floor
Palo Alto, CA 94306

Ashley M. Simonsen
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067

11. Can I still receive a settlement award if I object to the settlement?

If you object to the settlement but the Court approves the settlement despite your objection, you may obtain settlement benefits in the same manner as any other Class Member.

If the Court agrees with your (or any other) objection, and does not approve the settlement, you and other Class Members will not receive any settlement benefits because the settlement agreement will not become effective.

12. Can I appear at the final approval hearing?

If you do not exclude yourself from the settlement, you can (but do not have to) participate and speak for yourself at the final approval hearing. You can also have your own individual lawyer speak separately for you, but you will have to pay for that lawyer yourself.

If you want to appear, or if you want your own lawyer to participate and speak for you regarding the settlement, you and/or your lawyer must first file an objection to the settlement (as described above in Section 9). You must also include on the front of the objection the statement "I intend to appear at the hearing" and identify any persons you propose to call to testify at the hearing or evidence you intend to introduce.

13. Do I have to participate in the settlement?

You are not required to participate in the settlement, but you must take action to get out of the settlement. This is called "excluding yourself" or "opting out." If you exclude yourself from the settlement, you will not be eligible to receive any monetary compensation under the settlement. However, if you exclude yourself from the settlement, you will not be bound by any judgment or settlement of the case and will keep, subject to applicable law, your right to sue Facebook.

14. How can I exclude myself from the settlement?

To exclude yourself from the settlement, you must submit a written and signed statement requesting exclusion from the Class by October 23, 2020 to:

Scola, et al. v. Facebook Settlement Administrator
c/o Epiq Class Action & Claims Solutions, Inc.
P.O. Box [___]
[City / State / Zip Code]

To be effective, this written request must contain your name, address, and telephone number, be submitted via First Class U.S. mail, and be postmarked by October 23, 2020. If you fail to submit a valid and timely request for exclusion in this manner, you will be bound by the settlement and judgment entered by the Court.

15. What is the difference between excluding myself and objecting?

Objecting is telling the Court that you do not like something about the settlement but that you still want to participate in the settlement. You can object to the settlement only if you do not exclude yourself from the settlement.

Excluding yourself from the settlement is telling the Court that you do not want to be part of the settlement. If you exclude yourself from the settlement, you cannot object to the settlement because it no longer affects you.

16. What if I do nothing?

If you do nothing, you will be a Class Member and will be bound by the settlement. This means that you cannot bring a separate lawsuit against Facebook concerning injuries and/or damages allegedly caused by viewing graphic and objectionable material while working as a Content Moderator.

17. Do I need to hire my own attorney?

You do not need to hire an attorney, but you can if you want to. The Class Representatives, you, and the entire Class are already represented by the attorneys listed below, who are known as "Class Counsel":

Joseph R. Saveri - jsaveri@saverilawfirm.com
Steven N. Williams - swillliams@saverilawfirm.com
Kevin Rayhill - krayhill@saverilawfirm.com
Kyle Quackenbush - kquackenbush@saverilawfirm.com
JOSEPH SAVERI LAW FIRM, INC.
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Korey A. Nelson - knelson@burnscharest.com
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William Most - williammost@gmail.com
LAW OFFICE OF WILLIAM MOST
201 St. Charles Ave. Suite 114 #101
New Orleans, LA 70170
Telephone: (504) 509-5023

You do not need to pay for their services. They will be paid from the settlement fund. If you decide to hire your own attorney, you will have to pay for his or her services yourself.

20. What will Class Counsel and the Class Representatives get from this settlement?

Class Counsel have not received compensation for their services in bringing the lawsuit. They will seek to be paid from the settlement fund. They will ask the Court for an award of attorneys' fees and expenses of up to $17 million, or 32% of the settlement fund created by the settlement agreement.

Plaintiffs will also request service awards for the time and work they have put into this lawsuit.

Class Counsel will file motions asking the Court to approve these awards. The Court may approve these awards at the final approval hearing.

21. When will the settlement be final?

The Court has scheduled a final approval hearing for November 20, 2020 at 9:00 a.m. This hearing will occur before the Hon. V. Raymond Swope at the Superior Court for the State of California, County of San Mateo, 400 County Center, Department 23, Redwood City, CA 94063. The final approval hearing may be rescheduled to a later time without further notice to you.

You may, but do not have to, attend the final approval hearing. At the hearing, the Court will decide whether to approve the settlement, the requested award of attorneys' fees and expenses, the service awards for Plaintiffs for prosecuting this litigation, and the costs of administering this settlement.

If you wish to attend the final approval hearing in person, please see the Court's COVID-19 Order Number 11 and any future orders governing participation in Court proceedings by class members and the public (https://www.sanmateocourt.org/documents/court_news_and_notices/080520a.pdf).

You may attend the final approval hearing through the use of Zoom videoconferencing. Instructions for attending via Zoom will be posted on the settlement website (www.contentmoderatorsettlement.com) approximately two weeks before hearing on November 20, 2020.

After the Court rules on the final approval and either the time to appeal has expired or any appeal filed has been resolved in favor of the settlement, the settlement will become final. Once the settlement is final, the initial $1,000 payments will be sent to the Class Members, and Class Members will have 180 days to submit claims documenting diagnoses and any other damages.

22. Where can I get more information about the litigation of this case?

This notice provides only a summary of the lawsuit and settlement. For more detailed information, you may review the Complaint, the Settlement Agreement, and selected other filings at the settlement website: www. www.contentmoderatorsettlement.com.

Please direct any questions regarding this notice and the settlement to the *Scola, et al. v. Facebook* Settlement Administrator at [phone number] or to Class Counsel.

PLEASE DO NOT TELEPHONE THE COURT.

23. What dates should I be aware of?

October 23, 2020
Last day to file and postmark objections to the settlement (including any requests to appear before the Court)

October 23, 2020
Last day to file and postmark requests for exclusion from the Class

November 20, 2020, at 9:00 a.m. (unless otherwise ordered by the Court)
Fairness approval hearing at the Court