

## **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 August 14, 2020. 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](http://www.contentmoderatorsettlement.com). You can request that a copy of the full-length class notice be mailed to you by contacting the Claims Administrator by email at [info@contentmoderatorsettlement.com](mailto:info@contentmoderatorsettlement.com) or by mail at *Scola, et al. v. Facebook* Settlement Administrator, P.O. Box 3748, Portland, OR 97208-3748.

PLEASE DO NOT CONTACT THE COURT.

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