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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

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IN RE: FACEBOOK, INC. CONSUMER	MDL No. 2843
PRIVACY USER PROFILE LITIGATION	Case No. 18-md-02843-VC
This document relates to: ALL ACTIONS	NOTICE OF SETTLEMENT IN PRINCIPLE AND JOINT REQUEST TO STAY ACTION TO ALLOW PARTIES TO SEEK APPROVAL OF THE CLASS ACTION SETTLEMENT [CIV. L.R. 6-2, 7-12, AND 16-2(d)] Judge: Hon. Vince Chhabria Special Master Daniel Garrie

Pursuant to Civil Local Rules 6-2, 7-12, and 16-2(d), Plaintiffs and Defendant Meta Platforms, Inc. (collectively, the "Parties"), by and through their undersigned counsel, respectfully submit this notice that the Parties have reached a settlement in principle of the consolidated action *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*, Case No. 3:18-md-02843-VC (the "Action").

Because the Parties have reached an agreement in principle of the Action, and believe it will facilitate the process of finalizing a written settlement agreement and presenting to the Court for preliminary approval, the Parties jointly request a stay of the Action for sixty (60) days.

NOW, THEREFORE, IT IS HEREBY JOINTLY REQUESTED by and between the Parties, through their respective counsel, that, subject to the Court's approval and pursuant to Civil Local Rule 6-2, the Action will be stayed for sixty (60) days to allow the Parties to finalize a written settlement agreement and present to the Court for preliminary approval of the settlement.

Dated: August 26, 2022

KELLER ROHRBACK L.L.P.

By: <u>/s/ Derek W. Loeser</u> Derek W. Loeser

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Respectfully submitted,

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By: <u>/s/ Lesley E. Weaver</u> Lesley E. Weaver

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NOTICE OF SETTLEMENT AND JOINT REQUEST TO STAY ACTION

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of August, 2022, at Oakland, California.

> /s/ Lesley E. Weaver Lesley E. Weaver

[proposed] ORDER

Upon consideration of the Parties' Notice of Settlement In Principle and Joint Request to Stay Action, it is hereby ORDERED that the Parties have sixty (60) days from the date of this Order, or by no later than ______, 2022, to finalize and execute a written settlement agreement and to present to the Court for preliminary approval of the settlement.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: _____, 2022

VINCE CHHABRIA United States District Judge