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Attorneys for Plaintiff and the Settlement Class

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14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 JANE DOE,

18 *Plaintiff,*

19 v.

20 ROBLOX CORPORATION,

21 *Defendant.*
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CASE NO.: 3:21-cv-03943-WHO

DECLARATION OF YAMAN SALAHI IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF A CLASS ACTION SETTLEMENT

Honorable William H. Orrick

1 I, Yaman Salahi, declare and state as follows:

2 1. I am a Partner at Edelson PC, which represents Plaintiff in the above-captioned
3 matter and which has been appointed Settlement Class Counsel. I make this declaration in support
4 of Plaintiff's Motion for Final Approval of a Class Action Settlement.

5 2. I have personal knowledge of the matters stated herein and, if called upon, I could
6 and would competently testify thereto.

7 3. In July 2022, after the parties had begun discussing the contours of a potential class
8 settlement, I consulted Simpluris, Inc., to get an estimate of administration costs after we learned
9 from Roblox the amount in controversy and class size. Based on the information available to us at
10 the time, Simpluris estimated that total administration costs would be approximately \$11 million,
11 including notice, claims processing, standard settlement administration support, and disbursement
12 of payments to all class members. That was a conservative estimate because it assumed that 40%
13 of class members would opt to receive electronic payments rather than checks in the mail. Issuing
14 checks via mail automatically to 100% of Class Members was estimated to cost approximately
15 \$11 million for disbursement of checks alone.

16 4. Aside from being infeasible from a cost perspective, another reason why making
17 cash payments to all class members likely would not have been effective is that Roblox does not
18 maintain mailing address information for Class Members. Such mailing address information, if
19 available, would have had to be obtained from third-party platforms such as the Google Play Store
20 and Apple App Store, through which many of the U.S. dollar payments in question are made, a
21 costly and time-consuming process. Further, Roblox confirmed that its agreements with third-
22 party payment processors do not authorize it to place payments from the Settlement automatically
23 onto Class Members' credit or debit cards. Therefore, relief could not have been issued
24 automatically to Class Members. A claims process would have been required. Even assuming
25 settlement administration costs did not swallow the entirety of the settlement fund, it is highly
26 unlikely that a meaningful number of class members would have taken the time to complete a
27 claim form to recover one or two dollars.

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