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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JANE DOE,

Plaintiff,

v.

ROBLOX CORPORATION,

Defendant.

Case No.: 3:21-cv-03943-WHO

Hon. William H. Orrick

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**DECLARATION OF JACOB KAMENIR REGARDING
NOTICE AND CLAIMS ADMINISTRATION**

Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I, Jacob Kamenir, certify that the statements set forth herein are true and correct, except as to matters herein stated to be on information and belief, and as to such matters, I certify that I believe the same to be true:

1. I am Senior Director of Notice at Simpluris, Inc. (“Simpluris”), the court-appointed Settlement Administrator in the above-captioned case, whose principal office is located at 3194-C Airport Loop Dr., Costa Mesa, CA 92626. I am over twenty-one years of age and authorized to make this declaration on behalf of Simpluris and myself. I have personal knowledge of the information set forth herein.

2. Simpluris is a class action administrator located in Cost Mesa, California. Established in 2007, Simpluris has administered over 9,000 cases nationwide, with class sizes ranging from a few hundred to over one million class members. Representative cases include: *Myart v. AutoZone, Inc.* and *Aceves v. Autozone, Inc.* (US District Court, CA Central Division) (208,050 class members), *Diaz v. SeaWorld* (Superior Court of the State of California) (1,281,123 class members), and *Woods v. Vector Marketing* (US District Court, Northern District of California) (194,500 class members).

1 3. Simpluris was approved by Counsel for both Parties and appointed by the Court in the
2 Order Granting Preliminary Approval entered on May 11, 2023, to provide settlement administration
3 services in this settlement. In this capacity, Simpluris was charged with the following:

- 4 a. establishing and maintaining a settlement-specific website
5 (www.RobloxSettlement.com);
- 6 b. establishing and maintaining a settlement-specific toll-free phone number (1-833-
7 371-4373), offering the opportunity to listen to frequently-asked questions;
- 8 c. emailing the Notice to known Settlement Class Members that have at least one valid
9 email address;
- 10 d. receiving and processing Settlement Class Members' requests for exclusion from
11 the proposed settlement and objections to the proposed settlement;
- 12 e. receiving, processing, and validating claim forms submitted by Settlement Class
13 Members eligible to submit a Cash Claim Form;
- 14 f. processing and issuing payments via check or electronic payment to eligible
15 Settlement Class Members, and sending payments to the Settlement Class
16 Representative and Settlement Class Counsel;
- 17 g. providing counsel for the Parties with weekly status reports; and
- 18 h. other tasks as the Parties mutually agree or the Court orders Simpluris to perform.

19 4. CAFA Notification: On April 27, 2022, pursuant to the Class Action Fairness Act of
20 2005 and 28 U.S.C.A. § 1715 ("CAFA"), Simpluris completed a mailing that informed the appropriate
21 state and federal Attorneys General about the Settlement on behalf of Defendant Roblox Corporation.
22 Attached hereto as Exhibit A is a true and correct copy of the CAFA notice letter sent to the Attorneys
23 General and the list of recipients.

24 5. Class List: On May 12, 2023, Counsel for Defendant provided Simpluris with three (3)
25 data lists containing the Roblox account username, User ID, one or more email addresses, where
26 available, and the number of unrefunded Robux spent on moderated items during the Class Period for
27 each Settlement Class Member. The information on the three (3) files was merged into a single file
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1 which contained the full list of 16,208,903 Settlement Class Member accounts eligible to either
2 receive a refund of Robux or submit a claim to receive a cash payment (“Class List”). Of the
3 16,208,903 Settlement Class Member accounts in the Class List, 7,459,230 accounts were associated
4 with at least one email address.

5 6. Toll-Free Number: A toll-free telephone number was included on the Settlement
6 website for the purpose of allowing the Settlement Class Members to listen to frequently-asked
7 questions regarding the Settlement. The system is accessible 24 hours a day, 7 days a week, and will
8 remain in operation throughout the settlement process. The toll-free telephone number included on the
9 Settlement website is (833) 371-4373. This number is active and has been available to the public since
10 June 8, 2023. As of September 6, 2023, a total of 887 calls have been received.

11 7. Settlement Website: Simpluris prepared and maintains a Settlement website,
12 www.RobloxSettlement.com, that includes important dates and deadlines; Settlement-related
13 documents, such as the Settlement Agreement and the long form Notice; an online Claim Form
14 module; and an online Request for Exclusion form. The website has been available to the public since
15 June 7, 2023. As of September 6, 2023, the website has been visited by 291,715 unique visitors with
16 577,171 page views. Attached hereto as Exhibit B is a true and correct copy of the long form Notice
17 posted to the website.

18 8. Email Address: On or about June 8, 2023, Simpluris established a dedicated email
19 address, info@RobloxSettlement.com, as an alternative method for Settlement Class Members to
20 submit requests for exclusion and correspondence to Simpluris. As of September 6, 2023, the email
21 address has received 208 inquiries, which were responded to by Simpluris staff, as needed.

22 9. Email Notice: On March 24, 2023, Simpluris received from counsel a Microsoft Word
23 version of the email Notice to be sent to Settlement Class Members. Simpluris formatted the email
24 Notice in two versions: one version to be sent to Settlement Class Members that were eligible to
25 submit a claim for a cash payment and a second version to be sent to Settlement Class Members
26 eligible to receive a Robux refund. The email Notice sent to Settlement Class Members eligible to
27 submit a claim for a cash payment included a link to the Claim Form available on the Settlement
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1 website and the Unique Claim ID needed to submit a claim. Attached hereto as Exhibits C and D are
2 true and correct copies of the final email Notices.

3 10. The email Notices advised Settlement Class Members of their right to submit a claim,
4 as applicable, and their right to request exclusion from the settlement, object to the settlement, or do
5 nothing, as well as the implications of each such action. The Notices also advised Settlement Class
6 Members of applicable deadlines and other events, including the Final Approval Hearing, and how
7 Settlement Class Members could obtain additional information.

8 11. Beginning June 8, 2023, Simpluris sent an email Notice to all Settlement Class Member
9 accounts with at least one valid email address. Simpluris successfully delivered an email Notice
10 containing a Class Member ID and a link to the online Claim Form to 24,183 Settlement Class
11 Member accounts in the Class List that were eligible to submit a claim for a cash payment. The email
12 Notice intended for Settlement Class Member accounts that were not eligible to submit a claim for a
13 cash payment was successfully delivered to 6,724,996 Settlement Class Member accounts in the Class
14 List. Overall, email Notice was successfully delivered to 90.5% of the Settlement Class Member
15 accounts that had at least one email address in the Class List.

16 12. Reminder Email Notice: On July 11, 2023, a reminder email Notice was sent to 23,187
17 Settlement Class Member accounts that were eligible to submit a claim for a cash payment but had not
18 yet done so. The reminder email Notice reiterated the August 10, 2023 deadline to submit a claim and
19 again provided the Unique Claim ID and link to the online Claim Form. Attached hereto as Exhibit E
20 is a true and correct copy of the reminder email Notice.

21 13. Objections and Requests for Exclusion: The postmark deadline for Settlement Class
22 Members to submit a request for exclusion from the proposed settlement or object to the proposed
23 settlement was August 10, 2023. As of today's date, Simpluris has received zero (0) objections to the
24 proposed Settlement from Settlement Class Members. However, Simpluris has been informed that
25 Objections have been received by Counsel and the Court. At Counsel's request, we confirmed that we
26 are unable to locate the Roblox username JeepRider2021 in the Class List.

