

EXHIBIT B

NOTICE OF CLASS ACTION SETTLEMENT AND FINAL APPROVAL HEARING

Official Notice from the United States District Court for the Northern District of California

IF YOU USED ROBLOX AND YOUR VIRTUAL ITEMS WERE REMOVED FROM YOUR ACCOUNT, YOU MAY BE ENTITLED TO CASH OR ROBUX UNDER A CLASS ACTION SETTLEMENT

Read this notice carefully and show it to a parent or guardian if you are under 18 years old.

Roblox Corporation has settled a class action that claimed Roblox should have refunded Roblox users who spent Robux on virtual items that were later removed (moderated) from the Roblox platform. As part of this settlement, Roblox is establishing a \$10 million settlement fund from which users will automatically receive a credit of Robux to their Roblox account. Alternatively, eligible users can submit a claim to receive their share of the settlement fund as a cash payment if that share exceeds a value of \$10. This fund will also be used to pay the costs of notifying people about the Settlement and implementing it, the lawyers’ fees and costs, and a service award to the user who helped bring the lawsuit and obtain the settlement. Roblox has also agreed to maintain a policy of automatically crediting users for Robux spent on items that are later moderated for at least four more years.

With some exceptions, those included in this class settlement are all individuals in the United States who had a Roblox account prior to May 11, 2023, from which content was moderated and removed by Roblox (“class members”). The Court in charge of this case has not yet made a final decision to approve the Settlement. Payments of Robux and/or cash will be made only if the Court grants final approval to the Settlement and that decision is not reversed by appeal. *If you are a class member*, your legal rights are affected whether you act or not, so please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
Do Nothing	You will automatically receive a Robux credit to your account determined by your individual share of the settlement. You will release your right to individually sue Roblox for the issues in this lawsuit.
Fill Out a Claim Form	If your individual share of the settlement is worth more than \$10, you can elect to receive a cash payment instead of Robux credit by submitting a cash claim form by August 10, 2023 .
Object	Write to the Court about why you do not like something about the Settlement by August 10, 2023 .
Ask to be excluded from the Class	If you don’t want to be a part of the Settlement, you must submit a request to be excluded. You won’t get any money, Robux, or other benefits, but you will keep any rights to sue Roblox yourself for the same legal issues in this lawsuit.
Go to a hearing on September 27, 2023	You can ask to speak to the Court about your opinion of the Settlement, including the amount of lawyers’ fees. Written requests to speak must be received by the Court by August 10, 2023 .

BASIC INFORMATION

1. Why should I read this Notice?

This notice explains the lawsuit, the Settlement, your rights, what payments are available, and how to get them.

The Hon. William H. Orrick of the United States District Court for the Northern District of California is in charge of this class action. The lawsuit is known as *Doe v. Roblox Corporation*, Case No. 3:21-cv-03943-WHO.

2. What is this lawsuit about?

Plaintiff Jane Doe sued Roblox claiming that Roblox should have offered refunds or credit when “moderating” or “deleting” virtual items that users had acquired with Robux through the Roblox Avatar Shop. Roblox denies all allegations of wrongdoing or that it broke any laws and maintains that the Roblox Terms of Use expressly explained this practice.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called “Class Representatives” sue on behalf of other people who have similar claims. These people together are a “Class” or “Class Members.” One court resolves the issues in the case for everyone in the Class – except for those people who choose to exclude themselves from the Class. In this case, the Court appointed Jane Doe, who is under 18 so is being represented by her father John Dennis, as the Class Representative. Ms. Doe has a Roblox account and claims that items she obtained in the Avatar Shop were later deleted without receiving any credit or refund.

4. Why is there a Settlement?

Roblox and the Class Representative spent over a year and a half in Court fighting this case. After extended litigation, both sides agreed to a settlement. The Settlement gives Class Members guaranteed Robux credit or cash now whereas in a trial, Class Members might get nothing or might only get refunds years from now. Because there is a settlement, the Court has not decided who should win the case.

WHO IS INCLUDED IN THE SETTLEMENT

5. Am I included as part of the Class?

The Court decided that all people who fit this definition are included in the Class: “All individuals in the United States having a Roblox account prior to May 11, 2023, from which content on the Roblox platform was moderated and removed by Roblox.”

You may still be a member of the class even if you previously received a credit of Robux or a refund for removed items; but you will not receive any additional compensation under the Settlement for items that have already been credited or refunded by Roblox.

Some people who fit within the definition above are expressly excluded from the class for various reasons. The Settlement excludes 311 accounts that spent over 80,000 Robux (equating to over

\$1,000) on moderated items and who fall into one or more of these three categories: (1) the account used Robux to acquire the same virtual item multiple times; (2) the account used Robux to acquire a virtual item after that item had already been moderated; or (3) the account created a virtual item and then used Robux to acquire it themselves. To confirm whether your account is one of these 311 excluded Roblox accounts, please visit www.RobloxSettlement.com.

Additionally, the following individuals are excluded from the Class: (a) any Judge or Magistrate presiding over this action and members of their families; (b) Defendant, Defendant's subsidiaries, parents, successors, predecessors, and any entity in which Defendant or its parents have a controlling interest and its current or former employees, officers and directors; (c) persons who properly execute and file a timely request for exclusion from the Class; (d) persons whose claims in this matter have been finally adjudicated on the merits or otherwise released; and (e) the legal representatives, successors, and assigns of any such excluded persons.

Roblox's records were used to identify Class Members who should have received notice through email or their Roblox "My Inbox." If you did not get a notice by email or in your Roblox Inbox, and if you think you should be included in the Class, please contact the Settlement Administrator and be prepared to provide sufficient information about your Roblox account to prove that you own the account at issue.

For more information, please visit www.RobloxSettlement.com.

6. I'm still unsure if I am included.

If you are still not sure whether you are included, you can get free help at www.RobloxSettlement.com, or by calling the lawyers appointed to represent Class Members in this case, Edelson PC ("Edelson") of San Francisco, California at (866) 354-3015. Please do not contact the Court or Roblox.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

As part of this settlement, Roblox is establishing a \$10 million settlement fund from which users will automatically receive a credit of Robux to their Roblox account. Alternatively, eligible users can submit a claim to receive their share of the settlement fund as a cash payment if that share exceeds a value of \$10. This fund will also be used to pay the costs of notifying people about the Settlement and implementing it, the lawyers' fees and costs, and a service award to the user who helped bring the lawsuit and obtain the settlement. Class Counsel will request up to 25% of the Settlement Fund (or \$2.5 million) as compensation for their work on the case, as well as reimbursement of approximately \$18,000 in litigation costs. Roblox has also agreed to maintain for at least four more years its current program of providing automatic Robux credit for items obtained with Robux through the Avatar Shop that are later deleted or moderated by Roblox, unless the user has violated the Roblox Terms of Use.

8. What do I get from the Settlement?

If you are a class member, your share of the settlement fund will be determined by the amount of Robux you spent on items that were obtained through the Avatar Shop, but later moderated or deleted by Roblox, minus any credits or refunds you have already received for those items. Users who spent more Robux on removed items will be entitled to a higher amount than those who spent less.

If your share of the settlement is \$10 dollars or more, then you will have the option to choose to receive cash instead of Robux (see the answer to Question 9 below for more information about choosing cash). The amount you actually receive will depend on the amount of lawyers' fees, costs, expenses, and awards deducted from the Settlement Fund. The formula used to determine each individual's share is below:

$$\text{Individual Allocation} = \frac{\text{Individual Robux Spent Less Credits}}{\text{Total Robux Spent Less Total Credits}} \times \text{Net Settlement Fund}$$

For example, if the net settlement fund after deduction of administration expenses and attorney's fees and costs awards is \$6,995,000, and you spent 2500 Robux on moderated items that has not yet been credited back to you, your individual share of the settlement fund would be approximately \$10 or 1000 Robux. Someone who spent more than 2500 Robux on moderated items would be entitled to a larger share, and someone who spent less would be entitled to a smaller share.

Please see the answer to the next question for information about getting an estimate of your individual share of the settlement.

9. How can I collect these benefits?

To receive Robux credit for your share of the settlement, you do not have to do anything. The Robux will automatically be credited to your Roblox account. All class members will automatically receive a Robux credit to their account equal to their pro rata share of the settlement at a specially negotiated rate of 1 Robux per \$0.01. For example, if your share of the settlement fund is \$5, you would automatically receive 500 Robux credited back to your Roblox account. You do not have to submit a claim or take any other action to receive this automatic premium Robux credit.

Alternatively, class members whose share of the settlement is greater than or equal to \$10 can elect to receive their share of the settlement as a cash payment instead of a Robux credit. To receive a cash payment, eligible class members must submit a cash claim form before August 10, 2023. Class members who are potentially eligible to elect a cash payment will have a Unique Claim ID sent to them by email or in their Roblox account's "My Inbox". Class members will need this unique claim ID to get an estimate of their share of the settlement and to submit a claim for a cash payment. Cash claims can be submitted by clicking the link at the top of the unique claim ID notice or by going to www.RobloxSettlement.com.

If you did not receive a Unique Claim ID by email or in your Roblox account's "My Inbox", you are not eligible to elect to receive a cash payment. If the settlement is approved by the court, you will receive an automatic Robux credit without having to take any action in response to this notice.

Prior to submitting a cash claim form, potentially eligible class members will be presented with an estimate of what they might expect to receive so that they can determine which benefit they prefer. Please note that the estimate provided is only an estimate, as final amounts will not be determined by the court until a later date. Depending on the amounts determined by the court, not all claimants who submit a cash claim form will ultimately receive a cash payment.

If you opt to receive a cash payment instead of Robux, you can get payment by check or electronically through Venmo, Zelle, PayPal, and direct deposit to a bank account.

10. When will I get my payment?

Payments of Robux and cash will not be made until after the Court grants final approval to the Settlement and that decision is no longer subject to further review by an appellate court. The court will consider final approval of the Settlement on September 27, 2023. Even if the Court approves the Settlement, there may be appeals. It is always uncertain whether and when appeals can be resolved, and resolving them can take more than a year.

The Settlement Website will be updated to inform Class Members of the progress of the Settlement. Please be patient.

If you receive a payment by check, all checks will expire and become void 90 days after they are issued. If you do not cash your check before the 90 day deadline or it is not possible to process your electronic payment by that time, the check will be voided and the electronic transaction will be cancelled, and you will instead receive an automatic refund of Robux to your account instead of cash. If for some reason it is not possible to credit Robux to your Roblox account, then your share of the Settlement may be donated to a cy pres recipient to be approved by the Court.

WHAT HAPPENS IF YOU REMAIN IN THE SETTLEMENT

11. What am I giving up if I stay in the Class and receive the Settlement Benefits?

Unless you exclude yourself from the Settlement and forgo the right to any of the Settlement benefits, you are staying in the Class. That means that if the Court approves the Settlement, you will not have the right to file a separate lawsuit against, or seek further money from, Roblox for any issues or claims arising from or related to the deletion, removal, or moderation of virtual items obtained with Robux on the Roblox platform—whether or not you are currently aware of those claims.

The specific scope of the claims you are releasing is in paragraph 1.23 of the Settlement Agreement, which is available through the “Case Documents” link on the Settlement Website. If you have any questions, you can talk to the lawyers listed in Question 13 for free, or you can, of course, talk to your own lawyer if you have questions about what the release means.

12. What if I do nothing?

If you are a Class Member and do nothing (meaning you don’t submit a Claim Form and don’t exclude yourself), you will receive an automatic credit of Robux to your account according to your pro rata share of the Settlement. You will also release your right to sue Roblox in a separate lawsuit, as described above.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

The Court has appointed Jay Edelson, Rafey S. Balabanian, J. Eli Wade-Scott, Yaman Salahi, and P. Solange Hilfinger-Pardo of the law firm of Edelson PC (866) 354-3015 to represent you and all Class Members. These attorneys are called “Class Counsel.” The Court has also appointed Mark S. Reich and Courtney E. Maccarone of Levi & Korsinsky, LLP as “Liaison Counsel” to assist Class Counsel in representing the Class.

The law firms are experienced in handling similar class action cases. More information about Edelson and Levi & Korsinsky, their practices, and their lawyers' experience is available at www.edelson.com and www.zlk.com.

They believe, after fighting with Roblox in Court, that the Settlement Agreement is fair, reasonable, and in the best interests of the Class. You will not be separately charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

14. How will the lawyers be paid?

The Court will determine how much Class Counsel and Liaison Counsel will be paid for attorneys' fees, costs, and expenses in this case. The amounts will be paid from the \$10 million Settlement Fund. Class Counsel will apply for an attorney's fee award of no more than twenty five percent of the Settlement Fund, plus costs and expenses.

Class Counsel will also ask the Court to approve a service award of up to \$5,000 to compensate the Class Representative for her services on behalf of the Class.

Class Counsel's application for an award of attorney's fees, costs, and expenses and the class representative awards will be made available on the "Case Documents" page at www.RobloxSettlement.com on July 27, 2023.

EXCLUDING YOURSELF FROM THE CLASS

15. How do I get out of the Settlement?

To exclude yourself from the Class and decline the rights and benefits of the Settlement, you must submit a form to the Settlement Administrator by August 10, 2023, stating that you want to be excluded from the Class in *Doe v. Roblox*, Case No. 3:21-cv-03943-WHO (N.D. Cal.). To be valid, any request for exclusion must be submitted by letter or by using the Request for Exclusion Form. The letter or Request for Exclusion Form must (a) identify the case name *Doe v. Roblox*, No. 3:21-cv-03943-WHO (N.D. Cal.); (b) state the full legal name and current residential address of the person in the Settlement Class seeking exclusion; (c) identify their Roblox account username for the account that experienced removal of moderated items; (d) contain a statement to the effect that "I hereby request to be excluded from the proposed Settlement Class in *Doe v. Roblox*, No. 3:21-cv-03943-WHO (N.D. Cal.)"; (e) contain the hand signature of the person(s) seeking exclusion; and (f) be postmarked or received by the Settlement Administrator on or before the Objection/Exclusion Deadline.

You may not request to be excluded from the Settlement Class through "mass" or "class" opt-outs or bulk mailing of requests, meaning that each individual who seeks to be excluded must submit an individual request for exclusion form separate from any other individual's request to ensure the request manifests the individual's considered, personal decision.

[Click here to download or submit a request for exclusion form](#), or go to www.RobloxSettlement.com.

16. What if I do not exclude myself from the Settlement?

If you do not exclude yourself from the Settlement, you will receive the benefits of the Settlement described above and will give up any right to sue Roblox for the claims being resolved by this

Settlement. If you have a pending case against Roblox, please speak with your attorney immediately about this Settlement.

17. Will I get Robux Credit or Cash if I exclude myself from the Settlement?

No. If you exclude yourself, you will not receive Robux credit or cash, and you should not submit a Cash Claim Form to ask for a payment. If you attempt to both exclude yourself from the Settlement and receive a payment from the Settlement, your request for exclusion will be given priority and you will not receive a payment.

OBJECTING TO OR COMMENTING ON THE SETTLEMENT

18. How do I object or comment on the Settlement or the request for attorneys' fees, costs, expenses, and service award?

You can comment on, or object to, the Settlement, Class Counsel's request for attorney's fees, costs and expenses, and/or the request for a service award for the Class Representative.

You can ask the Court to deny approval of the Settlement. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no payments will be made now, and the litigation will continue. If that is what you want to happen, you must object.

Any objection to the proposed Settlement must be in writing. If you file a written objection before the deadline, you may, but don't have to, appear at the Final Approval Hearing. If you want to appear, you can do so yourself or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

All written objections must contain the following:

- The name and case number of this lawsuit (*Doe v. Roblox Corporation*, No. 3:21-CV-03943-WHO (N.D. Cal.));
- Your full legal name, mailing address, email address, telephone number, and Roblox account user name;
- If you use a different email address or telephone number for your Roblox account, please also provide that information;
- A statement that identifies whether you are objecting only on your own behalf, on behalf of a subsection of the Class, or on behalf of the Class as a whole;
- All reasons for your objection or comment, including all citations to legal authority and evidence supporting the objection;
- Whether you intend to personally appear and/or testify at the Final Approval Hearing (either personally or through counsel), and what witnesses you will ask to speak; and,
- Your handwritten or electronically signed signature.

Your comment or objection should be received by the Court either by mailing it to the Class Action Clerk, United States District Court for the Northern District of California, Phillip Burton Federal Building & U.S. Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102, or by filing it in person at any location of the United States District Court for the Northern District of

California. Your comment or objection should be filed or postmarked on or before August 10, 2023.

19. What is the difference between objecting and excluding myself from the Class?

Objecting means that you disagree with some aspect of the Settlement and think the Court should not approve the Settlement. An objection, or a comment, allows your views to be heard in court. You can object only if you stay in the Class.

Excluding yourself from the Class means that you are no longer a Class Member and do not want the Settlement to apply to you. If you exclude yourself, you lose any right to receive any payments or benefits from the Settlement or to object to the Settlement because the case no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

20. When and where will the Court decide whether to approve the Settlement?

The Court is scheduled to hold the Final Approval Hearing on September 27, 2023, at 2:00 p.m. in Courtroom 2 of the United States Courthouse, 450 Golden Gate Ave., 17th Floor, San Francisco, CA. The hearing may be rescheduled to a different date or time or location without another notice to Class Members. The date, time and location of the hearing may be subject to change, as may the manner in which Class Members might appear at the hearing. Please review the Settlement Website for any updated information regarding the final hearing.

At the Final Approval Hearing, the Court will consider whether the Settlement is fair, reasonable and adequate. If there are objections, the Court will consider them. The Court may listen to people who appear at the hearing and who have provided notice of their intent to appear at the hearing. The Court may also consider Class Counsel's application for attorney's fees, costs and expenses and for service awards to the Class Representative.

21. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you submit a written objection or comment, you do not have to come to the Court to talk about it. As long as you submit your written objection or comment on time, and follow the requirements above, the Court will consider it. You may also pay your own attorney to attend, but it is not required.

22. May I speak at the Final Approval Hearing?

Yes. You may ask the Court for permission to speak at the Final Approval Hearing. At the hearing, the Court may hear any objections and arguments concerning the fairness of the Settlement and/or Class Counsel's request for attorneys' fees, costs, expenses, and a service award.

To do so, you must include in your objection or comment a statement saying that it is your "Notice of Intent to Appear in *Doe v. Roblox Corporation*, Case No. 3:21-cv-03943-WHO." It must include your name, address, email, telephone number and signature as well as the name and address of your lawyer, if one is appearing for you. Your submission and notice of intent to appear must be filed with the Court and be received no later than August 10, 2023.

You cannot speak at the hearing if you exclude yourself from the Class.

GETTING MORE INFORMATION

23. How do I get more information?

This notice summarizes the proposed Settlement. More details are in the Stipulation of Class Action Settlement, in the Court's orders, and other relevant documents, which are available online at www.RobloxSettlement.com.

You can also get information about this case by accessing the Court docket, for a fee, through the Court's Public Access to Court Electronic (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, San Francisco Courthouse, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

You may also contact Class Counsel at the Edelson firm at (866) 354-3015.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

All questions regarding the Settlement or claims process should be directed to the Settlement Administrator or to Class Counsel.

BY ORDER OF THE UNITED STATES
DISTRICT COURT FOR THE NORTHERN
DISTRICT OF CALIFORNIA