

# EXHIBIT D

Re: Legal Notice of Roblox Class Action Settlement

**YOU ARE RECEIVING THIS NOTICE BECAUSE YOU MAY BE ENTITLED TO ROBUX AS PART OF A CLASS ACTION SETTLEMENT**

*If you are under 18 years old, please show this to a parent or guardian. This is an official notice about a class settlement that you should read carefully as it may affect your legal rights.*

**WHAT IS THIS NOTICE ABOUT?**

Plaintiff Jane Doe brought a lawsuit on May 25, 2021, alleging that Roblox failed to provide credits or refunds to Roblox users whenever items they had obtained with Robux from the Roblox Avatar Shop were removed or moderated from their accounts. In September 2021, after Ms. Doe's lawsuit was filed, Roblox changed this practice for such items going forward. As part of a class action settlement, Roblox has now agreed to establish a settlement fund of \$10 million for the benefit of Roblox users whose items were moderated and who have not yet received a full credit or refund. Such users will automatically receive a credit of Robux to their Roblox account without having to take any action. If an eligible user's share of the settlement fund exceeds a value of \$10, such users may submit a claim to receive their share as a cash payment instead of Robux. Roblox has also agreed to maintain its new Robux credit policy for at least four more years.

**WHO IS INCLUDED?**

With some exceptions, this class action settlement includes "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." These individuals are called "class members." If you received this notice by email or in your Roblox account Messages, Roblox's records show that you are likely a class member. There are certain exceptions explained at [www.RobloxSettlement.com](http://www.RobloxSettlement.com).

**WHAT DO I GET UNDER THE SETTLEMENT?**

If you are a class member, your share of the settlement fund will be based on the amount of Robux you spent on moderated items and which were not previously credited to your account as compared to other class members. For example, if you spent 100 Robux on moderated items and have not yet received a credit, you will receive a larger portion of the settlement than a user who spent only 50 Robux, but less than a user who spent 1,000 Robux. Any attorney's fees, costs, and service awards approved by the Court will be deducted from the Settlement Fund before calculating each class member's individual share. Details about the formula that will be used can be found on the settlement website.

**WHAT DO I NEED TO DO TO CLAIM THESE BENEFITS?**

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 premium 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 \$10 can elect to

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receive their share of the settlement as a cash payment instead of a Robux credit. To receive a cash payment, eligible class members must use the Unique Claim ID at the top of this notice to submit a cash claim form before August 10, 2023 by clicking the link at the top of this notice or by going to [www.RobloxSettlement.com](http://www.RobloxSettlement.com). Prior to submitting your cash claim form, you will be presented with an estimate of what you might expect to receive so that you can determine which benefit you 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 do not see the words “Unique Claim ID” at the top of this notice, 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.

### **DO I HAVE OTHER OPTIONS?**

If you are a Class Member but do not want the benefits offered above and want to keep your right to file your own lawsuit against Roblox for any of the issues or claims in the case, you can exclude yourself from the Class **no later than August 10, 2023**. If you do not exclude yourself from the Class, and the Court approves the Settlement, you will be bound by all orders of the Court and judgments in this case. If you stay in the Class, you may object to any aspect of the settlement, including the requests for attorneys’ fees, costs, expenses, and award to the class representative. You and/or your lawyer also have the right to appear before the Court. Your written objection must be filed **no later than August 10, 2023**.

Specific instructions about how to object or exclude yourself from the Class are available at [www.RobloxSettlement.com](http://www.RobloxSettlement.com).

### **DO I HAVE A LAWYER?**

The Court has appointed lawyers from the firm Edelson PC (“Edelson”) as “Class Counsel” and lawyers from the firm Levi & Korsinsky, LLP as “Liaison Counsel.” You do not have to pay Class Counsel or anyone else to participate. Class Counsel intend to request that the Court award them attorneys’ fees from the Settlement Fund not to exceed 25% (or \$2.5 million of the \$10 million settlement fund), plus reimbursement of litigation costs and expenses of approximately \$18,000. If you want to be represented by your own lawyer in this case, you may hire one at your expense. Jane Doe is a Class Member like you and the Court appointed her as the “Class Representative.” She will request a service award not to exceed \$5,000 for her service on behalf of the Class.

### **WHEN WILL THE COURT CONSIDER THE PROPOSED SETTLEMENT?**

The Court has scheduled a hearing on the fairness of Settlement at 2:00 p.m. on September 27, 2023 at the Philip Burton Federal Building and Courthouse, 450 Golden Gate Avenue, Courtroom 2, 17th floor, San Francisco, CA 94102. The Court will consider whether to approve the Settlement; any objections; and the requests for a service award to the Class Representative, and attorneys’ fees, costs and expenses to Class Counsel. You may ask to appear at the hearing but you do not have to. The date, time and location of the hearing may change. Please review the website at [www.RobloxSettlement.com](http://www.RobloxSettlement.com) for any updated information regarding the final hearing.

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**HOW DO I GET MORE INFORMATION?**

**This notice is only a summary.** For more information about the case and the Settlement, visit [www.RobloxSettlement.com](http://www.RobloxSettlement.com) or call Class Counsel at (866) 354-3015.

**PLEASE DO NOT CALL OR WRITE THE COURT OR ROBLOX FOR INFORMATION OR ADVICE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.**