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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

VISHAL SHAH and JAYDEN KIM, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

FANDOM, INC.,

Defendant.

Case No.: 3:24-cv-01062-RFL

**DECLARATION OF CAMERON R. AZARI, ESQ. REGARDING IMPLEMENTATION AND
ADEQUACY OF NOTICE PLAN**

I, Cameron R. Azari, Esq., hereby declare and state as follows:

1. My name is Cameron R. Azari, Esq. I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.
2. I am a nationally recognized expert in the field of legal notice and have served as an expert in hundreds of federal and state cases involving class action notice plans.
3. I am a Senior Vice President of Epiq Class Action & Claims Solutions, Inc. (“Epiq”) and the Managing Director of Epiq Legal Noticing (aka Hilsoft Notifications), a business unit of Epiq that

1 specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal
2 notification plans.

3 4. The facts in this declaration are based on my personal knowledge, as well as information
4 provided to me by my colleagues in the ordinary course of business at Epiq and Epiq Legal Noticing
5 (hereinafter “Epiq”).

6 **OVERVIEW**

7 5. This declaration describes the successful implementation of the Settlement notice plan (“Notice
8 Plan”) and notice (the “Notice” or “Notices”) for *Shah v. Fandom, Inc.*, Case No. 3:24-cv-01062, pending in
9 the United States District Court for the Northern District of California. I previously executed my
10 *Declaration of Cameron R. Azari, Esq. Regarding Notice Plan* (“Notice Plan Declaration”) on October
11 16, 2025, which described the Notice Plan, detailed Epiq’s class action notice experience, and attached
12 Epiq’s *curriculum vitae*. I also provided my educational and professional experience relating to class
13 actions and my ability to render opinions on overall adequacy of notice programs. Subsequently, I
14 executed my *Supplemental Declaration of Cameron R. Azari, Esq. Regarding Notice Plan*
15 (“Supplemental Notice Plan Declaration”) on December 11, 2025, which provided additional
16 information regarding the Notice Plan and planned settlement administration to address the questions
17 posed by the Court in the Court’s *Order Requesting Supplemental Briefing*, issued on December 4, 2025.

18 **CAFA NOTICE**

19 6. On October 24, 2025, Epiq sent 57 CAFA Notice Packages (“CAFA Notice”). The CAFA
20 Notice was mailed via United States Postal Service (“USPS”) Priority Mail to 53 officials (the Attorneys
21 General of 47 states, the District of Columbia, and the United States Territories). Per the direction of
22 the Office of the Nevada, New York, and Connecticut Attorneys General, the CAFA Notice was sent to
23 the Nevada, New York, and Connecticut Attorneys General electronically via email. The CAFA Notice
24 was also sent via United Parcel Service (“UPS”) to the Attorney General of the United States. Details
25 regarding the CAFA Notice mailing are provided in the *Declaration of Kyle S. Bingham on*
26 *Implementation of CAFA Notice*, dated November 1, 2025, which is included as **Attachment 1**.

NOTICE PLANNING METHODOLOGY

7. Federal Rules of Civil Procedure, Rule 23 directs that notice must be “the best notice that is practicable under the circumstances, including individual notice to all members who can be identified through reasonable effort” and that “the notice may be by one or more of the following: United States mail, electronic means, or other appropriate means.”¹ The Notice Plan satisfied these requirements.

8. This Notice Plan as designed and implemented reached the greatest practicable number of Settlement Class Members. The Notice Plan reached approximately 70% of the Settlement Class using a Media Plan (digital and social media notice) with an average frequency of 2.4 times each. “Reach” refers to the percentage of the unduplicated audience exposed to the notice. Notice exposure is defined as the opportunity to see a notice. “Frequency” of notice exposure is the average number of times that those reached by a notice would be exposed to the notice. The reach was further enhanced by internet sponsored search listings, an informational release, and a settlement website, which were not included in the reach calculation. In my experience, the Notice Plan was consistent with other court-approved notice plans, was the best notice practicable under the circumstances of this case, and satisfied the requirements of due process, including its “desire to actually inform” requirement.² The Notice Plan also complied with the Court’s Standing Order for Civil Cases.

NOTICE PLAN DETAIL

9. On December 16, 2025, the Court approved the Notice Plan and appointed Epiq as the Settlement Administrator in the *Order Granting Preliminary Approval of Class Action Settlement*

¹ Fed. R. Civ. P. 23(c)(2)(B).

² *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 315 (1950) (“But when notice is a person’s due, process which is a mere gesture is not due process. The means employed must be such as one desirous of actually informing the absentee might reasonably adopt to accomplish it. The reasonableness and hence the constitutional validity of any chosen method may be defended on the ground that it is in itself reasonably certain to inform those affected . . .”); *see also In re Hyundai & Kia Fuel Econ. Litig.*, 926 F.3d 539, 567 (9th Cir. 2019) (“To satisfy Rule 23(e)(1), settlement notices must ‘present information about a proposed settlement neutrally, simply, and understandably.’ ‘Notice is satisfactory if it generally describes the terms of the settlement in sufficient detail to alert those with adverse viewpoints to investigate and to come forward and be heard.’”) (citations omitted); N.D. Cal. Procedural Guidance for Class Action Settlements, Preliminary Approval (3) (articulating best practices and procedures for class notice).

1 (“Preliminary Approval Order”). In the Preliminary Approval Order, the Court certified for settlement
2 purposes only, the following “Settlement Class”:

3 [A]ll persons who accessed www.gamespot.com, or any of its subdomains, in
4 California and had their information collected by the Trackers between January
5 5, 2023 to the present.

6 10. After the Court’s Preliminary Approval Order was entered, Epiq implemented the Notice
7 Plan. This declaration details the notice activities undertaken to date and explains how and why the
8 Notice Plan was comprehensive and well-suited to reach the Settlement Class Members. This
9 declaration also discusses the administration activity to date.

10 **NOTICE PLAN**

11 **Media Plan**

12 ***Internet Digital Notice Campaign***

13 11. Internet advertising has become a standard component in legal notice programs. The internet
14 has proven to be an efficient and cost-effective method to target class members as part of providing
15 notice of class certification and/or a settlement for a class action case. According to MRI-Simmons
16 data,³ 97% of all adults are online and 84% of all adults use social media.⁴

17 12. The Notice Plan included targeted digital advertising (“Digital Notices”) on the selected
18 advertising networks *Google Display Network* and *Yahoo Audience Network* (in English and Spanish),
19 which represent thousands of digital properties across all major content categories. Digital Notice also
20 ran on Gamespot.com targeting adults 18+. Digital Notices were targeted to selected target audiences
21 and were designed to encourage participation by Settlement Class Members—by linking directly to the

22 _____
23 ³ MRI-Simmons is a leading source of publication readership and product usage data for the
24 communications industry. MRI-Simmons is a joint venture of GfK Mediamark Research & Intelligence,
25 LLC (“MRI”) and Simmons Market Research. MRI-Simmons offers comprehensive demographic,
26 lifestyle, product usage and exposure to all forms of advertising media collected from a single sample.
27 As the leading U.S. supplier of multimedia audience research, the company provides information to
28 magazines, televisions, radio, internet, and other media, leading national advertisers, and over 450
advertising agencies—including 90 of the top 100 in the United States. MRI-Simmons’s national
syndicated data is widely used by companies as the basis for the majority of the media and marketing plans
that are written for advertised brands in the United States.

⁴ MRI-Simmons 2025 Survey of the American Consumer®.

1 settlement website, allowing visitors easy access to relevant information and documents.

2 13. Digital Notices were also placed on the leading social media platforms in the United States,
3 including *Reddit*, *YouTube*, *Facebook*, and *Instagram*. The social media campaign used an interest-
4 based approach which focused on the interests that users exhibited while on the social media platforms,
5 capitalizing on the target audience's propensity to engage in social media.

6 14. *Reddit* is a widely used social forum website that contains more than one million
7 communities known as subreddits. These communities cover specific topics making this an ideal
8 platform to reach individuals with focused interests. *Reddit* has 52 million users in the United States.⁵

9 15. *YouTube* is the largest streaming video website in the United States with 254 million users.⁶

10 16. *Facebook* is one of the leading social networking sites in the United States with 197 million
11 users,⁷ and *Instagram* has 181 million active users in the United States.⁸

12 17. The Digital Notices were distributed to a variety of target audiences, including those relevant
13 to individual's demonstrated interests and/or likes. All Digital Notices appeared on desktop, mobile,
14 and tablet devices. Digital Notices on *Google Display Network*, *Yahoo Audience Network*, *Reddit*,
15 *YouTube*, *Facebook*, and *Instagram* were displayed in the State of California, and also nationwide.
16 Digital Notices were also targeted (remarketed) to people who click on a Digital Notice. *Google Display*
17 *Network*, *Yahoo Audience Network*, *Reddit*, *YouTube*, *Facebook*, and *Instagram* targeted Digital Notices
18 to the selected aggregated/anonymous audience segments, and the Notice Plan did not involve the
19 installation of anything directly on Settlement Class Members' browsers.

20 18. More details regarding the target audiences, specific ad sizes of the Digital Notices, and the
21 number of delivered impressions are included in the following table:

22
23
24 _____
25 ⁵ Statista Digital 2025: Global Overview Report. Statista, founded in 2007, is a leading provider of
26 worldwide market and consumer data and is trusted by thousands of companies around the world for
27 data. Statista.com consolidates statistical data on over 80,000 topics from more than 22,500 sources and
28 makes it available in German, English, French and Spanish.

⁶ Statista Digital 2025: Global Overview Report.

⁷ Statista Digital 2025: Global Overview Report.

⁸ Statista Digital 2025: Global Overview Report.

<i>Network/ Property</i>	<i>Target</i>	<i>Language</i>	<i>Ad Size</i>	<i>Delivered National Impressions</i>	<i>Delivered California Impressions</i>
<i>Google Display Network</i>	Adults 18+	English / Spanish	728x90, 300x250, 300x600 & 970x250	---	6,327,939
<i>Google Display Network</i>	Adults 18+ and affinity targeting ⁹ for video game enthusiasts, console gamers and/or PC gamers	English / Spanish	728x90, 300x250, 300x600 & 970x250	---	6,550,984
<i>Google Display Network</i>	Adults 18+ and intent targeting ¹⁰ for Gamespot, video game reviews and/or video game news	English / Spanish	728x90, 300x250, 300x600 & 970x250	15,453,232	6,349,090
<i>Yahoo Audience Network</i>	Adults 18+ and video game content targeting	English / Spanish	728x90, 300x250, 300x600 & 970x250	5,261,006	6,448,273
<i>Gamespot.com</i>	Adults 18+	English	728x90, 300x250, 300x600 & 970x250	2,273,266	2,116,123
<i>Reddit</i>	Adults 18+ and keyword targeting for Gamespot	English	Reddit Feed Ads	2,144,499	1,286,575
<i>YouTube</i>	Adults 18+ and intent targeting for Gamespot and/or channel targeting for http://youtube.com/ @gamespot	English	:30 Video Ads	2,082,557	1,577,953
<i>Facebook</i>	Adults 18+	English	Newsfeed & Right Hand Column	---	3,072,205
<i>Facebook</i>	Adults 18+ and interests in Gamespot, video games and/or PC games	English	Newsfeed & Right Hand Column	8,148,476	3,881,632
<i>Instagram</i>	Adults 18+	English	Instagram Newsfeed	---	1,575,691

⁹ “Affinity Targeting” allowed Epiq to target specific websites, keywords, and/or relevant content the targeted users may have been viewing.

¹⁰ “Intent Targeting” allowed Epiq to target individuals who were searching (or have searched) for information on this specific targeted content on the internet.

<i>Network/ Property</i>	<i>Target</i>	<i>Language</i>	<i>Ad Size</i>	<i>Delivered National Impressions</i>	<i>Delivered California Impressions</i>
<i>Instagram</i>	Adults 18+ and interests in Gamespot, video games and/or PC games	English	Instagram Newsfeed	4,403,589	2,588,398
TOTAL				39,766,625	41,774,863

19. Combined, approximately 81.5 million impressions were generated by the Digital Notices. The Digital Notices ran from January 16, 2026, through February 26, 2026.¹¹ Clicking on the Digital Notices linked the readers to the settlement website, where they could easily obtain detailed information about the Settlement. Examples of the Digital Notices are included as **Attachment 2**.

Sponsored Search Listings

20. To facilitate locating the settlement website, sponsored search listings were acquired on the three most highly-visited internet search engines: *Google*, *Yahoo!*, and *Bing*. When visitors to these search engines searched for selected keyword combinations related to the Settlement, the sponsored search listing advertisement created for this Settlement was displayed. Generally, the sponsored search listing advertisement appeared at the top of the visitor’s website page prior to the search results or in the upper right-hand column of the web-browser screen. The sponsored search listings were displayed nationally. All sponsored search listings linked directly to the settlement website.

21. The sponsored search listings began on January 16, 2026, and ran through March 17, 2026. The sponsored listings were displayed 47,841 times, which resulted in 3,015 clicks that displayed the settlement website. A complete list of the sponsored search keyword combinations is included as **Attachment 3**. Examples of the sponsored search listing as displayed on each search engine are included as **Attachment 4**.

¹¹ The third-party ad management platform, ClickCease was used to audit the Digital Notice ad placements. This type of platform tracks all Digital Notice ad clicks to provide real-time ad monitoring, fraud traffic analysis, blocks clicks from fraudulent sources, and quarantines dangerous IP addresses. This helps reduce wasted, fraudulent, or otherwise invalid traffic (e.g., ads being seen by ‘bots’ or non-humans, ads not being viewable, etc.).

1 *Informational Release*

2 22. To build additional reach and extend exposures, on January 16, 2026, a party-neutral
3 Informational Release was issued over *PR Newswire's California and California Hispanic Newslines*
4 (in English and Spanish) to over 600 general media (print and broadcast) outlets as well as websites,
5 online databases, internet networks, and social networking media in English and over 400 outlets in
6 Spanish, plus distribution to 490 contacts nationally, covering gaming software (in English).

7 23. The Informational Release included the settlement website address and the toll-free telephone
8 number. The Informational Release served a valuable role by providing additional notice exposures beyond
9 that which was provided by the paid media. The Informational Release is included as **Attachment 5**.

10 *Settlement Website*

11 24. On January 15, 2026, Epiq established a dedicated website for the Settlement with an easy
12 to remember domain name (www.GamespotSettlement.com). Relevant documents were posted on the
13 settlement website, including the Long Form Notice (in English and Spanish), Claim Form (in English
14 and Spanish), Complaint, Settlement Agreement, Preliminary Approval Order, Settlement Class
15 Counsel's fee and cost application, and other case-related documents. In addition, the settlement website
16 includes relevant dates, answers to frequently asked questions ("FAQs"), instructions for how Settlement
17 Class Members could opt-out (request exclusion) from or object to the Settlement prior to the deadlines,
18 contact information for the Settlement Administrator, and how to obtain other case-related information.
19 Settlement Class Members were also able to file a Claim Form on the settlement website prior to the
20 Claims Deadline. The settlement website address was prominently displayed in all notice documents.
21 As of May 6, 2026, there have been 746,401 unique visitor sessions to the settlement website, and
22 2,502,934 web pages have been presented. The Long Form Notice in English is included as **Attachment**
23 **6**. The Long Form Notice in Spanish is included as **Attachment 7**. The Claim Form in English is
24 included as **Attachment 8**. The Claim Form in Spanish is included as **Attachment 9**.

25 *Toll-Free Telephone Number & Contact Information*

26 25. On January 15, 2026, Epiq established a toll-free telephone number (1-877-714-5775) in
27 English and Spanish for the Settlement. Callers are able to hear an introductory message and have the
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1 option to learn more about the Settlement in the form of recorded answers to FAQs. This automated
2 telephone system is available 24 hours per day, 7 days per week. The toll-free telephone number was
3 prominently displayed in all notice documents. As of May 6, 2026, there have been 45 calls to the toll-
4 free telephone number representing 87 minutes of use.

5 26. A postal mailing address was established and continues to be available, allowing Settlement
6 Class Members the opportunity to request additional information or ask questions.

7 *Requests for Exclusion and Objections*

8 27. The deadline to request exclusion from the Settlement or to object to the Settlement was
9 March, 17, 2026. As of May 6, 2026, Epiq has received one request for exclusion. As of May 6, 2026,
10 Epiq is aware of no objections to the Settlement. The Exclusion Report is included as **Attachment 10**.

11 *Claim Submission & Distribution Options*

12 28. The Notices provided a detailed summary of relevant information about the Settlement,
13 including the settlement website address, and how Settlement Class Members could file a Claim Form
14 online or by mail prior to the Claims Deadline. With any method of filing a Claim Form, Settlement
15 Class Members were given the option of receiving a digital payment or a traditional paper check. Epiq
16 worked with counsel for the parties to select an appropriate menu of payment options. The type of digital
17 payment selected does not impact Epiq's compensation for its work as the Settlement Administrator, and
18 no digital option is discouraged relative to other options.

19 29. The deadline for Settlement Class Members to file a Claim Form was April 16, 2026. As of
20 May 6, 2026, Epiq has received 401,929 Claim Forms (401,559 online and 370 paper). Since the Claims
21 Deadline has just recently passed, these numbers are preliminary. As standard practice, Epiq is in the
22 process of conducting a complete quality control review of Claim Forms received. There is a likelihood
23 that after detailed review, the total number of Claim Forms received will change due to duplicate and
24 denied Claim Forms.

25 *Fraud Prevention & Detection for Claim Submissions*

26 30. Fraudulent claim filing is an unfortunate reality in many class action settlements in recent
27 years. Given the current trends within the Class Action Industry with fraudulent claim filing by bad
28

1 actors, some level of fraudulent claim filing was anticipated in a case like this. Epiq partners with the
2 top resources in the industry to combat fraud, following best practices to deter and detect fraud. Epiq is
3 in the process of conducting an analysis of Claim Forms by looking at numerous known indicators of
4 indicia of fraud. Epiq anticipates that some portion of the total number of Claim Forms submitted will
5 be deemed fraudulent.

6 ***Cost of Notice Implementation and Settlement Administration***

7 31. Through March 2026, administration fees and expenses total \$80,111.99, which is inclusive
8 of the costs to implement the Notice Plan and administer the notice-related components of the settlement
9 to date. The cost encompasses digital notice and social media, internet sponsored search listings, an
10 informational release, and settlement administration (website/toll-free telephone support and associated
11 project management). Based on the current scope of settlement administration, Epiq anticipates
12 additional fees and expenses will be incurred to complete the settlement administration, leading up to
13 and following the Final Approval Hearing.

14 32. Additional work remains leading up to and following the Final Approval Hearing to
15 complete all aspects of the settlement administration. The remaining work to be completed includes: (1)
16 comprehensive reporting and analysis of Claim Forms looking at numerous known indicators of indicia
17 of fraud to identify and reject fraudulent Claim Forms; (2) mail defect letters (including print and
18 postage); (3) distributing settlement funds to members of the Settlement Class with a valid Claim Form
19 (digital payments or physical checks and postage); (4) handling undeliverable payments; (5) re-issuing
20 payments; (6) communications with members of the Settlement Class, including maintaining the
21 settlement website and toll-free telephone number throughout the remaining duration of the settlement
22 administration; and (7) associated project management and related billable hours to handle the
23 distribution and related settlement administration responsibilities. All fees and expenses are subject to
24 the Service Contract under which Epiq is retained as the Settlement Administrator, and the terms and
25 conditions of that agreement.

26 **CONCLUSION**

27 33. In class action notice planning, execution, and analysis, we are guided by due process
28

1 considerations under the United States Constitution, by federal and local rules and statutes, and further
2 by case law pertaining to notice. This framework directs that the notice plan be designed to reach the
3 greatest practicable number of potential class members and, that the notice or notice plan provide class
4 members with easy access to the details of how the class action may impact their rights. All of these
5 requirements were met in this case.

6 34. The Notice Plan reached approximately 70% of the Settlement Class using a Media Plan
7 (digital and social media notice) with an average frequency of 2.4 times each. The reach was further
8 enhanced by internet sponsored search listings, an informational release, and a settlement website, which
9 was not included in the reach calculation. The Federal Judicial Center’s (“FJC”) *Judges’ Class Action*
10 *Notice and Claims Process Checklist and Plain Language Guide*, which is relied upon for federal cases
11 and is illustrative for state courts, states that, “the lynchpin in an objective determination of the adequacy
12 of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the
13 class. It is reasonable to reach between 70–95%.”¹² Here, we have developed and implemented a Notice
14 Plan that readily achieved a reach within that standard.

15 35. The Notice Plan followed the guidance for how to satisfy due process obligations that a
16 notice expert gleans from the United States Supreme Court’s seminal decisions, which are: a) to endeavor
17 to actually inform the Settlement Class, and b) to demonstrate that notice is reasonably calculated to do
18 so:

- 19 a) “[W]hen notice is a person’s due, process which is a mere gesture is not due process.
20 The means employed must be such as one desirous of actually informing the
21 absentee might reasonably adopt to accomplish it,” *Mullane v. Central Hanover*
Trust, 339 U.S. 306, 315 (1950); and
- 22 b) “[N]otice must be reasonably calculated, under all the circumstances, to apprise
23 interested parties of the pendency of the action and afford them an opportunity to
24 present their objections,” *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156 (1974) (citing
25 *Mullane*, 339 U.S. at 314).

26 _____
27 ¹² FED. JUDICIAL CTR, JUDGES’ CLASS ACTION NOTICE AND CLAIMS PROCESS CHECKLIST AND PLAIN
28 LANGUAGE GUIDE 3 (2010), available at <https://www.fjc.gov/content/judges-class-action-notice-and-claims-process-checklist-and-plain-language-guide-0>.

Attachment 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VISHAL SHAH and JAYDEN KIM, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

FANDOM, INC.,

Defendant.

Case No. 3:24-cv-01062-RFL

DECLARATION OF KYLE S. BINGHAM ON IMPLEMENTATION OF CAFA NOTICE

I, KYLE S. BINGHAM, hereby declare and state as follows:

1. My name is KYLE S. BINGHAM. I am over the age of 25 and I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am the Senior Director of Legal Noticing for Epiq Class Action & Claims Solutions, Inc. (“Epiq”), a firm that specializes in designing, developing, analyzing and implementing large-scale, un-biased, legal notification plans. I have overseen and handled Class Action Fairness Act (“CAFA”) notice mailings for more than 500 class action settlements.

3. Epiq is a firm with more than 25 years of experience in claims processing and settlement administration. Epiq’s class action case administration services include coordination of all notice requirements, design of direct-mail notices, establishment of fulfillment services, receipt and processing of opt-outs, coordination with the United States Postal Service (“USPS”), claims database management, claim adjudication, funds management and distribution services.

4. The facts in this Declaration are based on what I personally know, as well as information provided to me in the ordinary course of my business by my colleagues at Epiq.

CAFA NOTICE IMPLEMENTATION

5. At the direction of counsel for Defendant Fandom, Inc., 57 federal and state officials (the Attorney General of the United States and the Attorneys General of each of the 50 states, the District of Columbia, and the United States Territories) were identified to receive CAFA notice.

6. Epiq maintains a list of these federal and state officials with contact information for the purpose of providing CAFA notice. Prior to mailing, the names and addresses selected from Epiq’s list were verified, then run through the Coding Accuracy Support System (“CASS”) maintained by the United States Postal Service (“USPS”).¹

7. On October 24, 2025, Epiq sent 57 CAFA Notice Packages (“Notice”). The Notice was mailed via USPS Priority Mail to 53 officials (the Attorneys General of 47 states, the District of Columbia, and the United States Territories). As per the direction of the Office of the Nevada, New York, and Connecticut Attorneys General, the Notice was sent to the Nevada, New York, and Connecticut Attorneys General electronically via email. The Notice was also sent via United Parcel Service (“UPS”) to the Attorney General of the United States. The CAFA Notice Service List (USPS Priority Mail, Email, and UPS) is included as **Attachment 1**.

8. The materials sent to the federal and state officials included a Cover Letter, which provided notice of the proposed Settlement of the above-captioned case. The Cover Letter is included as **Attachment 2**.

9. The cover letter was accompanied by a CD, which included the following:

- a. **Per 28 U.S.C. § 1715(b)(1) – Complaint and Any Amended Complaints:**

¹ CASS improves the accuracy of carrier route, 5-digit ZIP®, ZIP + 4® and delivery point codes that appear on mail pieces. The USPS makes this system available to mailing firms who want to improve the accuracy of postal codes, i.e., 5-digit ZIP®, ZIP + 4®, delivery point (DPCs), and carrier route codes that appear on mail pieces.

- Class Action Complaint (filed February 21, 2024); and
 - First Amended Class Action Complaint (filed April 29, 2024).
- b. **Per 28 U.S.C. § 1715(b)(3) – Notification to Class Members:**
- Claim Form (*Exhibit A to the Settlement Agreement*); and
 - Long Form Notice (*Exhibit B to the Settlement Agreement*).
- c. **Per 28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** The following documents were included:
- Plaintiffs’ Notice of Motion and Motion for Preliminary Approval of Class Action Settlement;
 - Declaration of Max S. Roberts in Support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement;
 - Class Action Settlement Agreement (*Exhibit 1 to the Roberts Declaration*)
 - Declaration of Cameron R. Azari, Esq. Regarding Notice Plan; and
 - [Proposed] Order Granting Preliminary Approval of Class Action Settlement.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 1, 2025.



KYLE S. BINGHAM

Attachment 1

CAFA Notice Service List

USPS Priority Mail

Appropriate Official	FullName	Address1	Address2	City	State	Zip
Office of the Attorney General	Stephen J. Cox	1031 W 4th Ave	Suite 200	Anchorage	AK	99501
Office of the Attorney General	Steve Marshall	501 Washington Ave		Montgomery	AL	36104
Office of the Attorney General	Tim Griffin	323 Center St	Suite 200	Little Rock	AR	72201
Office of the Attorney General	Kris Mayes	2005 N Central Ave		Phoenix	AZ	85004
Office of the Attorney General	CAFA Coordinator	Consumer Protection Section	455 Golden Gate Ave Suite 11000	San Francisco	CA	94102
Office of the Attorney General	Phil Weiser	Ralph L Carr Colorado Judicial Center	1300 Broadway Fl 10	Denver	CO	80203
Office of the Attorney General	Brian Schwalb	400 6th St NW		Washington	DC	20001
Office of the Attorney General	Kathy Jennings	Carvel State Bldg	820 N French St	Wilmington	DE	19801
Office of the Attorney General	James Uthmeier	State of Florida	The Capitol PL-01	Tallahassee	FL	32399
Office of the Attorney General	Chris Carr	40 Capitol Square SW		Atlanta	GA	30334
Department of the Attorney General	Anne E Lopez	425 Queen St		Honolulu	HI	96813
Iowa Attorney General	Brenna Bird	Hoover State Office Building	1305 E Walnut St	Des Moines	IA	50319
Office of the Attorney General	Raul Labrador	700 W Jefferson St Ste 210	PO Box 83720	Boise	ID	83720
Office of the Attorney General	Kwame Raoul	500 South Second Street		Springfield	IL	62701
Office of the Indiana Attorney General	Todd Rokita	Indiana Government Center South	302 W Washington St Rm 5	Indianapolis	IN	46204
Office of the Attorney General	Kris Kobach	120 SW 10th Ave 2nd Fl		Topeka	KS	66612
Office of the Attorney General	Russell Coleman	700 Capitol Ave Suite 118		Frankfort	KY	40601
Office of the Attorney General	Liz Murrill	PO Box 94005		Baton Rouge	LA	70804
Office of the Attorney General	Andrea Campbell	1 Ashburton Pl 20th Fl		Boston	MA	02108
Office of the Attorney General	Anthony G Brown	200 St Paul Pl		Baltimore	MD	21202
Office of the Attorney General	Aaron Frey	6 State House Station		Augusta	ME	04333
Department of Attorney General	Dana Nessel	PO BOX 30212	525 W. Ottawa St.	Lansing	MI	48909
Office of the Attorney General	Keith Ellison	445 Minnesota St Ste 1400		St Paul	MN	55101
Missouri Attorney General's Office	Catherine Hanaway	207 West High Street	PO Box 899	Jefferson City	MO	65102
Mississippi Attorney General	Lynn Fitch	PO Box 220		Jackson	MS	39205
Office of the Attorney General	Austin Knudsen	215 N Sanders 3rd Fl	PO Box 201401	Helena	MT	59620
Attorney General's Office	Jeff Jackson	9001 Mail Service Ctr		Raleigh	NC	27699
Office of the Attorney General	Drew H Wrigley	600 E Boulevard Ave Dept 125		Bismarck	ND	58505
Nebraska Attorney General	Mike Hilgers	2115 State Capitol	PO Box 98920	Lincoln	NE	68509
Office of the Attorney General	John Formella	NH Department of Justice	33 Capitol St	Concord	NH	03301
Office of the Attorney General	Matthew J Platkin	25 Market Street	PO Box 080	Trenton	NJ	08625
Office of the Attorney General	Raul Torrez	408 Galisteo St	Villagra Bldg	Santa Fe	NM	87501
Office of the Attorney General	Dave Yost	30 E Broad St Fl 14		Columbus	OH	43215
Office of the Attorney General	Gentner Drummond	313 NE 21st St		Oklahoma City	OK	73105
Office of the Attorney General	Dan Rayfield	Oregon Department of Justice	1162 Court St NE	Salem	OR	97301
Office of the Attorney General	Dave Sunday	16th Fl Strawberry Square		Harrisburg	PA	17120
Office of the Attorney General	Peter F Neronha	150 S Main St		Providence	RI	02903
Office of the Attorney General	Alan Wilson	PO Box 11549		Columbia	SC	29211
Office of the Attorney General	Marty Jackley	1302 E Hwy 14 Ste 1		Pierre	SD	57501
Office of the Attorney General	Jonathan Skrmetti	PO Box 20207		Nashville	TN	37202
Office of the Attorney General	Ken Paxton	PO Box 12548		Austin	TX	78711
Office of the Attorney General	Derek Brown	Utah State Capitol Complex	350 North State Street Ste 230	Salt Lake City	UT	84114
Office of the Attorney General	Jason S Miyares	202 N 9th St		Richmond	VA	23219
Office of the Attorney General	Charity R Clark	109 State St		Montpelier	VT	05609
Office of the Attorney General	Nick Brown	800 5th Ave Ste 2000		Seattle	WA	98104
Office of the Attorney General	Josh Kaul	PO Box 7857		Madison	WI	53707
Office of the Attorney General	JB McCuskey	State Capitol Complex Bldg 1 Room E 26	1900 Kanawha Blvd E	Charleston	WV	25305
Office of the Attorney General	Keith Kautz	109 State Capital		Cheyenne	WY	82002
Department of Legal Affairs	Gwen Tauiliili-Langkilde	GHC Reid Building, Pago Plaza, 2d flr, Room 220	Territory of American Samoa	Pago Pago	AS	96799
Attorney General Office of Guam	Douglas Moylan	ITC Bldg.	590 S Marine Corps Dr Ste 901	Tamuning	GU	96913
Office of the Attorney General	Edward Manibusan	PO Box 10007		Saipan	MP	96950
PR Department of Justice	Lourdes L. Gomez Torres	PO Box 9020192		San Juan	PR	00902
Department of Justice	Gordon C. Rhea	3438 Kronprindsens Gade	GERS BLDG 2nd Floor	St Thomas	VI	00802

Email

Appropriate Official	Contact Format	State
Office of the Attorney General for Connecticut	All documents sent to CT AG at their dedicated CAFA email inbox.	CT
Office of the Attorney General for Nevada	All documents sent to NV AG at their dedicated CAFA email inbox.	NV
Office of the Attorney General for New York	All documents sent to NY AG at their dedicated CAFA email inbox.	NY

UPS

Appropriate Official	FullName	Address1	Address2	City	State
US Department of Justice	Pamela Bondi	950 Pennsylvania Ave NW		Washington	DC

Attachment 2

CAFA NOTICE ADMINISTRATOR

10300 SW Allen Blvd
Beaverton, OR 97005
P 503-350-5800
DL-CAFA@epiqglobal.com

October 24, 2025

VIA UPS OR USPS PRIORITY MAIL

Class Action Fairness Act – Notice to Federal and State Officials

Dear Federal and State Officials:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), codified at 28 U.S.C. § 1715, please find enclosed information from Defendant Fandom, Inc. (“Defendant”) relating to the proposed settlement of a class action lawsuit.

- **Case:** *Shah v. Fandom, Inc.*, Case No. 3:24-cv-01062-RFL.
- **Court:** United States District Court for the Northern District of California.
- **Defendant:** Fandom, Inc.
- **Documents Enclosed:** In accordance with the requirements of 28 U.S.C. § 1715, please find copies of the following documents associated with this action on the enclosed CD:
 1. **Per 28 U.S.C. § 1715(b)(1) – Complaint and Any Amended Complaints:**
 - Class Action Complaint (filed February 21, 2024); and
 - First Amended Class Action Complaint (filed April 29, 2024).
 2. **Per 28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The Court has scheduled a preliminary approval hearing for December 16, 2025. No final approval hearing or other judicial hearings concerning the settlement agreement have been scheduled at this time.
 3. **Per 28 U.S.C. § 1715(b)(3) – Notification to Class Members:**
 - Claim Form (*Exhibit A to the Settlement Agreement*); and
 - Long Form Notice (*Exhibit B to the Settlement Agreement*).
 4. **Per 28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** The following documents are included:
 - Plaintiffs’ Notice of Motion and Motion for Preliminary Approval of Class Action Settlement;
 - Declaration of Max S. Roberts in Support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement;
 - Class Action Settlement Agreement (*Exhibit 1 to the Roberts Declaration*);

CAFA NOTICE ADMINISTRATOR

10300 SW Allen Blvd
Beaverton, OR 97005
P 503-350-5800
DL-CAFA@epiqglobal.com

- Declaration of Cameron R. Azari, Esq. Regarding Notice Plan; and
 - [Proposed] Order Granting Preliminary Approval of Class Action Settlement.
5. **Per 28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** There are no other Settlements or Agreements between the parties.
 6. **Per 28 U.S.C. § 1715(b)(6) – Final Judgment or Notice of Dismissal:** To date, the Court has not issued a final order, judgment or dismissal in the above-referenced action.
 7. **Per 28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The Settlement Class means all persons who accessed www.gamespot.com, or any of its subdomains, in California and had their IP address collected by the Trackers between January 5, 2023 to the present. Excluded from the Settlement Class are (1) any Judge or Magistrate presiding over this Action and members of their families; (2) the Defendant, its subsidiaries, parent companies, successors, predecessors, and any entity in which the Defendant or its parents have a controlling interest and their current or former officers, directors, agents, attorneys, and employees; (3) persons who properly execute and file a timely request for exclusion from the class; and (4) the legal representatives, successors or assigns of any such excluded persons.

CAFA requires Defendants to provide, “if feasible, the names of class members who reside in each State and the estimated proportionate share of the claims of such members to the entire settlement to that state’s appropriate State official.” 28 U.S.C. §1715(b)(7)(A). If it is not feasible to provide that information, CAFA requires a “reasonable estimate” from the Defendants. 28 U.S.C. § 1715(b)(7)(B).

At this time, the Defendant cannot feasibly determine the names of the class members residing in each state and therefore cannot feasibly estimate the proportionate share of the claims of such members to the entire settlement pursuant to 28 U.S.C. §1715(b)(7)(A) and (B).

8. **Per 28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** To date, the Court has not issued a final order or judgment in the above-referenced action.

If you have questions or concerns about this notice or the enclosed materials, please contact this office.

Sincerely,

CAFA Notice Administrator

Enclosures

Attachment 2



By Josh Coulson — Published 5 hours ago

Josh has been playing video games for longer than he can remember, kicking things off with a Master System before upgrading to a Mega Drive. Covering the industry since 2018, if a game has a strong story - or even better, the...

Although Disney is still in the video game business, we don't get quite as many movie-tie-in titles and games based on its core IP as we used to. Now Disney has made it even harder for us to revisit the era when we'd get those games on the regular, as it just pulled 14 of them from Steam without any warning whatsoever.

Not only has Disney delisted 14 of its games on Steam without telling anyone it planned to do so, but it hasn't even addressed the mass removal after the fact. The gaming world has had to rely on those who keep a close eye on these things, like Wario64, who spotted the games being pulled in Steam's backend and shared the unfortunate news with the rest of us.

Hercules, Finding Nemo, And More Are No Longer Available On Steam



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'Totalmente falso': Julio Iglesias niega las acusaciones de abuso sexual

Actualizado hace una hora

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Se revela la fecha de transmisión en Hulu para la película biográfica de 'Springsteen'



Ya está abierta la exposición de Selena en el Museo Grammy de Los Ángeles



La NUEVA película de 'Phineas y Ferb' explora un importante giro en los viajes en el tiempo



El estreno de 'The Beauty' de FX en Nueva York se celebró en el MoMA



Nuevo avance de 'Avengers: Doomsday' une a dos héroes por primera vez



El actor Timothy Busfield de 'West Wing' enfrenta otra acusación de agresión

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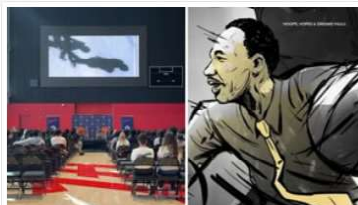
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Tu primera computadora portátil NVIDIA N1X podría venir de Dell

Paulo Vargas

Vie, 16 de enero de 2026 a las 6:32 a. m. EST

Añade Yahoo Tech en Google



Una computadora portátil NVIDIA N1X probada por Dell ha aparecido nuevamente a través de una lista de pruebas filtrada en X, y es una de las señales más claras hasta ahora de que los planes de procesadores para computadoras portátiles de Nvidia, sobre los que se ha rumoreado durante

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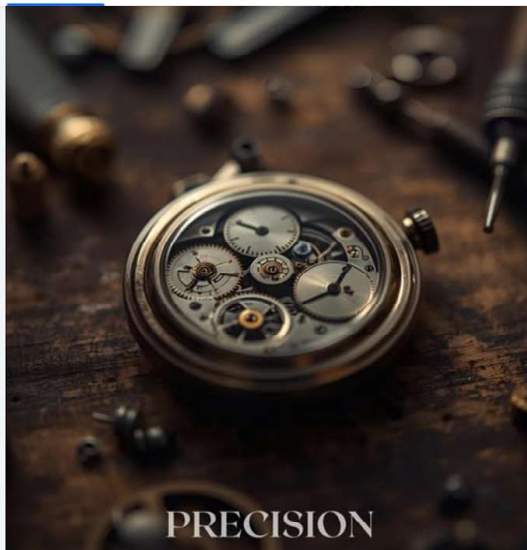


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Attachment 3

GameStop Settlement

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AI Overview

Fandom faces multiple lawsuits, notably class actions in California alleging it illegally tracked users' IP addresses and shared data (like video viewing habits) with third parties (Meta, etc.) without consent, violating privacy laws (CIPA, VPPA). A settlement was recently announced for the GameSpot tracking case (part of Fandom's network). Separately, there are also ongoing issues with ads, content control, and other privacy concerns, with users complaining about intrusive ads and editorial interference.

Key Lawsuits & Allegations:

- **Shah v. Fandom, Inc. (CIPA Violation):** Accuses Fandom of installing trackers (GumGum, Audiencerate, TripleLift) on sites like GameSpot, sending user IP addresses to third parties without consent, violating California's Invasion of Privacy

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AI Overview

"Fandom Settlement" most commonly refers to a recent \$1.2 million class-action lawsuit settlement by [Fandom Inc.](#) for alleged privacy violations on its [GameSpot website](#), where trackers sent user data without consent, impacting California users who visited between early 2023 and late 2025. Alternatively, "Settlements" can refer to in-game locations in various video games (like From or Elite Dangerous) or a specific crafting RPG game called [Settlements](#) on the Fandom platform.

The Fandom Privacy Settlement Details:

- **What it's about:** Allegations that Fandom used GumGum, Audiencerate, and TripleLift trackers on GameSpot, sharing IP addresses with third parties without consent, violating California's privacy laws (CIPA).

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gamestopvppasettlement.com https://www.gamestopvppasettlement.com > Home > Faq

Aldana v. GameStop, Inc. - Frequently Asked Questions

Defendant is GameStop, Inc. What is a class action? In a class action, one or more people called the class representatives (in this case, Alejandro Aldana and Scott Gallie) sue on behalf of a group or a ...

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ClassAction.org
https://www.classaction.org/join-video-game-investigations

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Attachment 5

If you accessed GameSpot in California between January 5, 2023 and December 16, 2025, you may be entitled to a payment from a Class Action Settlement

USA - English ▼

NEWS PROVIDED BY

United States District Court for the Northern District of California →

Jan 16, 2026, 08:00 ET

SAN FRANCISCO, Jan. 16, 2026 /PRNewswire/ --

A settlement has been reached in a class action lawsuit against Fandom, Inc. The class action lawsuit alleges that Defendant, Fandom, Inc., installed and used three trackers—the GumGum Tracker, Audiencerate Tracker, and TripleLift Tracker (the "Trackers")— on Website visitors' internet browsers, without consent and in violation of Section 638.51(a) of the California Invasion of Privacy Act ("CIPA"). The Defendant denies that it violated any law. The Court has not determined who is right. Rather, the Parties have agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

Who is included?

The Settlement Class consists of all persons who accessed www.gamespot.com and its subdomains (the "Website") in California and had their IP address collected by the Trackers between January 5, 2023 to through, and including, December 16, 2025.

What does the Settlement provide?

Defendant has created a Settlement Fund totaling \$1.2 million. Class Member payments, and the cost to administer the Settlement, the cost to inform people about the Settlement, attorneys' fees, and an award to the Class Representative will also come out of this fund. If you are member of the Settlement Class you may submit a Claim Form to receive a portion of the Settlement Fund. The amount of this payment will depend on how many of the Class Members file valid claims. Each Class Member who files a valid claim will receive a *pro rata* (meaning equal) portion of the Settlement Fund.

How do I get a payment?

If you are a Class Member and you want to get a payment, you must complete and submit a Claim Form by **April 16, 2026**. Claim Forms can be found and submitted online at www.GameSpotSettlement.com, or by printing and mailing a paper Claim Form, copies of which are available for download at www.GameSpotSettlement.com.

What are my options?

Do Nothing. If you do nothing, you won't get any benefits from this Settlement. You won't be able to start a lawsuit or be part of any other lawsuit against the Defendants for the claims being resolved by this Settlement unless you exclude yourself.

Exclude Yourself. To exclude yourself from the Settlement, you must mail or deliver your exclusion request no later than **March 17, 2026**. You will receive no benefits, but you will retain any rights you currently have to sue the Defendant about the claims in this case.

Object. You can ask the Court to deny approval by filing an objection. To object, you must write to the Court explaining why you don't like the Settlement and file your objection no later than **March 17, 2026**.

The Court will hold the Final Approval Hearing at **1:30 p.m. PT on May 19, 2026**, in person and via Zoom to consider whether to approve the Settlement, attorneys' fees, costs, expenses, and service awards, and any objections. You or your lawyer hired by you may attend and ask to appear at the hearing if you object, but you are not required to do so.

This notice is a summary. Learn more about the Settlement at www.GameSpotSettlement.com or by calling toll-free 1-877-714-5775.

SOURCE United States District Court for the Northern District of California

Si accedió a GameSpot en California entre el 5 de enero de 2023 y el 16 de diciembre de 2025, puede ser elegible para un pago de una conciliación de demanda colectiva

USA - español ▼

NEWS PROVIDED BY

United States District Court for the Northern District of California →

Jan 16, 2026, 08:00 ET

SAN FRANCISCO, 16 de enero de 2026 /PRNewswire-HISPANIC PR WIRE/ --

Se ha alcanzado una Conciliación en una demanda colectiva contra Fandom, Inc. En la demanda colectiva se alega que el Demandado, Fandom, Inc., instaló y utilizó tres rastreadores —el rastreador GumGum, el rastreador Audiencerate y el rastreador TripleLift (los "Rastreadores")— en los navegadores de Internet de los visitantes del Sitio Web, sin obtener el consentimiento y en violación de la Sección 638.51(a) de la Ley de Invasión de Privacidad de California (California Invasion of Privacy Act, "CIPA"). El Demandado niega haber violado una ley. El Tribunal no ha determinado quién tiene razón. En su lugar, las partes han decidido llegar a una conciliación en relación con la demanda para evitar la incertidumbre y los gastos asociados con la continuación del litigio.

¿Quiénes están incluidos?

El Grupo de Demandantes de la Conciliación incluye a todas las personas que accedieron a

www.gamespot.com y sus subdominios (el "Sitio Web") en California y cuyas direcciones IP fueron recopiladas por los Rastreadores entre el 5 de enero de 2023 y el 16 de diciembre de 2025 inclusive.

¿Qué establece la Conciliación?

El Demandado ha creado un Fondo de la Conciliación que alcanza un total de \$1.2 millones. Los pagos para los Miembros del Grupo de Demandantes, el costo por gestionar la Conciliación, el costo por informar a las personas sobre la Conciliación, los honorarios de los abogados y el pago para el Representante del Grupo de Demandantes también provendrán de este fondo. Si usted es Miembro del Grupo de Demandantes de la Conciliación, puede completar y enviar un Formulario de Reclamo para recibir una parte del Fondo de la Conciliación. El monto de este pago dependerá de cuántos de los Miembros del Grupo de Demandantes presenten reclamos válidos. Cada uno de los Miembros del Grupo de Demandantes que presente un reclamo válido recibirá una parte *prorrataada* (es decir, igual) del Fondo de la Conciliación.

¿Cómo recibo un pago?

Si usted es Miembro del Grupo de Demandantes y desea obtener un pago, debe completar y enviar un Formulario de Reclamo a más tardar el **16 de abril de 2026**. Los Formularios de Reclamo se pueden encontrar y enviar en línea en www.GameSpotSettlement.com, o imprimiendo y enviando por correo un Formulario de Reclamo en papel, cuyas copias se pueden descargar en www.GameSpotSettlement.com.

¿Cuáles son mis opciones?

No hacer nada. Si no hace nada, no recibirá ningún beneficio de esta Conciliación. A menos que se excluya, no podrá comenzar una demanda ni ser parte de una demanda contra el Demandado por los reclamos que se resuelvan en esta Conciliación.

Excluirse. Para excluirse de la Conciliación, debe enviar por correo o entregar la solicitud de exclusión a más tardar el **17 de marzo de 2026**. No recibirá beneficios, pero conservará cualquier derecho que tenga actualmente de presentar una demanda contra el Demandado sobre los reclamos de este caso.

Objetar. Puede solicitarle al Tribunal que no haga lugar a la aprobación al presentar una objeción. Para objetar, debe escribir al Tribunal explicando por qué no le agrada la Conciliación y presentar su objeción a más tardar el **17 de marzo de 2026**.

El Tribunal celebrará una Audiencia de Aprobación Definitiva el **19 de mayo de 2026 a la 1:30 p.m. Hora del Pacífico**, en persona y a través de Zoom, para considerar si se aprueba la Conciliación, los honorarios, los costos, los gastos y la compensación por servicios de los abogados, y cualquier objeción. Usted o el abogado que usted contrate pueden asistir y solicitar comparecer en la audiencia si usted objeta, pero no están obligados a hacerlo.

Este aviso es un resumen. Obtenga más información sobre la Conciliación en www.GameSpotSettlement.com, o llamando al número gratuito 1-877-714-5775.

URL: www.GameSpotSettlement.com

FUENTE United States District Court for the Northern District of California

Attachment 6

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA*Shah v. Fandom, Inc.*, Case No. 3:24-cv-01062-RFL

If You Accessed GameSpot in California Between January 5, 2023 and December 16, 2025, You May Be Entitled to a Payment From a Class Action Settlement.

A court authorized this notice. You are not being sued. This is not a solicitation from a lawyer.

- A settlement has been reached in a class action lawsuit against Fandom, Inc. The class action lawsuit alleges that that Defendant, Fandom, Inc., installed and used three trackers—the GumGum Tracker, Audiencerate Tracker, and TripleLift Tracker (the “Trackers”)— on Website visitors’ internet browsers, without consent and in violation of Section 638.51(a) of the California Invasion of Privacy Act (“CIPA”).
- You are included if you are a person who accessed www.gamespot.com or any of its subdomains in the state of California from January 5, 2023 to and through December 16, 2025.
- Persons included in the Settlement will be eligible to receive a *pro rata* (meaning equal) portion of the Settlement Fund.
- Read this notice carefully. Your legal rights are affected whether you act, or don’t act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM BY APRIL 16, 2026	This is the only way to receive a payment.
EXCLUDE YOURSELF BY MARCH 17, 2026	You will receive no benefits, but you will retain any rights you currently have to sue the Defendant about the claims in this case.
OBJECT BY MARCH 17, 2026	Write to the Court explaining why you don’t like the Settlement.
GO TO THE HEARING ON MAY 19, 2026	Ask to speak in Court about your opinion of the Settlement.
DO NOTHING	You won’t get a share of the Settlement benefits and will give up your rights to sue the Defendant about the claims in this case.

Your rights and options—and the deadlines to exercise them—are explained in this Notice.

BASIC INFORMATION

1. Why was this Notice issued?

A Court authorized this notice because you have a right to know about a proposed Settlement of this class action lawsuit and about all of your options, before the Court decides whether to give final approval to the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights.

The Honorable Rita F. Lin, of the U.S. District Court for the Northern District of California, is overseeing this case. The case is called *Shah v. Fandom, Inc.*, Case No. 3:24-cv-01062-RFL. The person who has sued is called the Plaintiff. The Defendant is Fandom, Inc.

Questions? Call 1-877-714-5775 Toll Free, or visit www.GameSpotSettlement.com

2. What is a class action?

In a class action, one or more people called the class representatives (in this case, Vishal Shah and Jayden Kim) sue on behalf of a group or a “class” of people who have similar claims. In a class action, the court resolves the issues for all class members, except for those who exclude themselves from the Class.

3. What is this lawsuit about?

This lawsuit alleges that Defendant, Fandom, Inc., installed and used three trackers—the GumGum Tracker, Audiencerate Tracker, and TripleLift Tracker (the “Trackers”)— on Website visitors’ internet browsers, without consent and in violation of Section 638.51(a) of the California Invasion of Privacy Act (“CIPA”). The Defendant denies that it violated any law. The Court has not determined who is right. Rather, the Parties have agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

4. Why is there a Settlement?

The Court has not decided whether the Plaintiff or the Defendant should win this case. Instead, both sides agreed to a Settlement. That way, they avoid the uncertainties and expenses associated with ongoing litigation, and Class Members will get compensation sooner rather than, if at all, after the completion of a trial.

WHO’S INCLUDED IN THE SETTLEMENT?

5. How do I know if I am in the Settlement Class?

The **Settlement Class** is defined as:

all persons who accessed www.gamespot.com and its subdomains (the “Website”) in California and had their IP address collected by the Trackers between January 5, 2023 to through, and including, December 16, 2025.

THE SETTLEMENT BENEFITS

6. What does the Settlement provide?

Defendant has created a Settlement Fund totaling \$1,200,000.00. Class Member payments, and the cost to administer the Settlement, the cost to inform people about the Settlement, attorneys’ fees, and an award to the Class Representative will also come out of this fund (*see* Question 13).

7. How much will my payment be?

If you are member of the Settlement Class you may submit a Claim Form to receive a portion of the Settlement Fund. The amount of this payment will depend on how many of the Class Members file valid claims. Each Class Member who files a valid claim will receive a proportionate share of the Settlement Fund.

Questions? Call 1-877-714-5775 Toll Free, or visit www.GameSpotSettlement.com

8. When will I get my payment?

The hearing to consider the fairness of the settlement is scheduled for May 19, 2026. If the Court approves the settlement, eligible Class Members whose claims were approved by the Settlement Administrator will receive their payment 90 days after the Settlement has been finally approved and/or any appeals process is complete. The payment will be made in the form of a check, unless you elect to receive payment by PayPal or Venmo, and all checks will expire and become void 180 days after they are issued.

HOW TO GET BENEFITS

9. How do I get a payment?

If you are a Class Member and you want to get a payment, you **must** complete and submit a Claim Form by **April 16, 2026**. Claim Forms can be found and submitted online at www.GameSpotSettlement.com, or by printing and mailing a paper Claim Form, copies of which are available for download at www.GameSpotSettlement.com.

We also encourage you to submit your claim on-line. Not only is it easier and more secure, but it is completely free and takes only minutes!

REMAINING IN THE SETTLEMENT

10. What am I giving up if I stay in the Class?

If the Settlement becomes final, you will give up your right to sue Defendant for the claims this Settlement resolves. The Settlement Agreement describes the specific claims you are giving up against the Defendant. You will be “releasing” the Defendant and certain of its affiliates described in Section 1.23 of the Settlement Agreement. Unless you exclude yourself (*see* Question 14), you are “releasing” the claims, regardless of whether you submit a claim or not. The Settlement Agreement is available through the “court documents” link on the website.

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions you can talk to the lawyers listed in Question 12 for free or you can, of course, talk to your own lawyer if you have questions about what this means.

11. What happens if I do nothing at all?

If you do nothing, you won’t get any benefits from this Settlement. But, unless you exclude yourself, you won’t be able to start a lawsuit or be part of any other lawsuit against the Defendants for the claims being resolved by this Settlement.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in the case?

The Court has appointed the law firm of Bursor & Fisher, P.A. to be the attorneys representing the Settlement Class. They are called “Class Counsel.” They believe, after conducting an extensive investigation, that the Settlement Agreement is fair, reasonable, and in the best interests of the

Questions? Call 1-877-714-5775 Toll Free, or visit www.GameSpotSettlement.com

Settlement Class. You will not be charged for this lawyer. If you want to be represented by your own lawyer in this case, you may hire one at your expense.

13. How will the lawyers be paid?

Class Counsel's attorneys' fees, costs, and expenses will be paid from the Settlement Fund in an amount determined and awarded by the Court. Class Counsel is entitled to seek no more than one-third of the \$1.2 million Settlement Fund, but the Court may award less than this amount.

As approved by the Court, the Class Representative will be paid an Incentive Award from the Settlement Fund for helping to bring and settle the case. The Class Representative will seek no more than \$5,000 as an incentive award, but the Court may award less than this amount.

EXCLUDING YOURSELF FROM THE SETTLEMENT

14. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must mail or otherwise deliver a letter (or request for exclusion) stating that you want to be excluded from the *Shah v. Fandom, Inc.*, Case No. 3:24-cv-01062-RFL settlement. Your letter or request for exclusion must also include your name, your address, your signature, the name and number of this case, and a statement that you wish to be excluded. You must mail or deliver your exclusion request no later than **March 17, 2026** to:

GameSpot CIPA Settlement
PO Box 6787
Portland, OR 97228-6787

15. If I don't exclude myself, can I sue the Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendant for the claims being resolved by this Settlement.

16. If I exclude myself, can I get anything from this Settlement?

No. If you exclude yourself, do not submit a Claim Form to ask for benefits.

OBJECTING TO THE SETTLEMENT

17. How do I object to the Settlement?

You can ask the Court to deny approval by filing an objection. You can't ask the Court to order a different settlement; the Court can only approve or reject the settlement. If the Court denies approval, no settlement payments will be sent out, and the lawsuit will continue. If that is what you want to happen, you should object.

To object, you must file with the Court a letter or brief stating that you object to the Settlement in *Shah v. Fandom, Inc.*, Case No. 3:24-cv-01062-RFL and identify all your reasons for your objections (including citations and supporting evidence) and attach any materials you rely on for your objections. Your letter or brief must also include your name, an explanation of the basis upon which you claim to be a Settlement Class Member, the name and contact information of any and all attorneys representing, advising, or in any way assisting you in connection with your objection, and your

Questions? Call 1-877-714-5775 Toll Free, or visit www.GameSpotSettlement.com

signature. If you, or an attorney assisting you with your objection, have ever objected to any class action settlement where you or the objecting attorney has asked for or received payment in exchange for dismissal of the objection (or any related appeal) without modification to the settlement, you must include a statement in your objection identifying each such case by full case caption. You must also mail or deliver a copy of your letter or brief to Class Counsel and Defendant's Counsel listed below.

Class Counsel will file with the Court and post on this website its request for attorneys' fees by March 2, 2026.

If you want to appear and speak at the Final Approval Hearing to object to the Settlement, with or without a lawyer (explained below in answer to Question Number 21), you must say so in your letter or brief. File the objection with the Court and mail a copy to Class Counsel and Defendant's Counsel postmarked no later than **March 17, 2026**. Notwithstanding these requirements, upon a showing of good cause to the Court, any objecting Settlement Class Member may appear, in person or by counsel, at the Final Approval Hearing held by the Court.

COURT	CLASS COUNSEL	DEFENDANT'S COUNSEL
The Hon. Rita F. Lin San Francisco Courthouse, Courtroom 15 450 Golden Gate Ave. San Francisco, CA 94102	Max S. Roberts Bursor & Fisher PA 1990 North California Blvd., 9th Floor Walnut Creek, CA 94596	Ryan Tyz Tyz Law Group PC 4 Embarcadero Center, 14th Fl. San Francisco, CA 94111

18. What's the difference between objecting and excluding myself from the Settlement?

Objecting simply means telling the Court that you don't like something about the Settlement. You can object only if you stay in the Class. Excluding yourself from the Class is telling the Court that you don't want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FINAL APPROVAL HEARING

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

The Court will hold the Final Approval Hearing at **1:30 p.m. PT on May 19, 2026**, in Courtroom 3 at the U.S. Courthouse, 450 Golden Gate Ave., San Francisco, CA 94102. The Hearing will also take place via Zoom at <https://cand.uscourts.gov/judges/rfl/lin-rita-f>.

The purpose of the hearing will be for the Court to determine whether to approve the Settlement as fair, reasonable, adequate, and in the best interests of the Class; to consider the Class Counsel's request for attorneys' fees and expenses; and to consider the request for an incentive award to the Class Representatives. At that hearing, the Court will be available to hear any objections and arguments concerning the fairness of the Settlement.

The hearing may be postponed to a different date or time without notice, so it is a good idea to check www.GameSpotSettlement.com. If, however, you timely objected to the Settlement and advised the Court that you intend to appear and speak at the Final Approval Hearing, you will receive notice of any change in the date of such Final Approval Hearing.

Questions? Call 1-877-714-5775 Toll Free, or visit www.GameSpotSettlement.com

20. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. But, you are welcome to come at your own expense. If you send an objection or comment, you don't have to come to Court to talk about it. As long as you filed and mailed your written objection on time, the Court will consider it. You may also pay another lawyer to attend, but it's not required.

21. May I speak at the hearing?

Yes. You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must include in your letter or brief objecting to the settlement a statement saying that it is your "Notice of Intent to Appear in *Shah v. Fandom, Inc.*, Case No. 3:24-cv-01062-RFL." It must include your name, address, telephone number and signature as well as the name and address of your lawyer, if one is appearing for you. Your notice of intent to appear must be filed with the Court and postmarked no later than **May 7, 2026**, and be sent to the addresses listed in Question 17. Notwithstanding these requirements, upon a showing of good cause to the Court, any objecting Settlement Class Member may appear, in person or by counsel, at the Final Approval Hearing held by the Court. Your objection must be filed with the Court and postmarked no later than **March 17, 2026**, and be sent to the addresses listed in Question 17.

GETTING MORE INFORMATION**22. Where do I get more information?**

This notice summarizes the proposed settlement. For the precise terms of the settlement, please see the settlement agreement available at www.GameSpotSettlement.com, by contacting class counsel at info@bursor.com, by accessing the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (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, 450 Golden Gate Ave., San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

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

Questions? Call 1-877-714-5775 Toll Free, or visit www.GameSpotSettlement.com

Attachment 7

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA*Shah v. Fandom, Inc.*, caso n. 3:24-cv-01062-RFL

Si accedió a GameSpot en California entre el 5 de enero de 2023 y el 16 de diciembre de 2025, puede ser elegible para un pago de una conciliación de demanda colectiva.

Un tribunal autorizó este aviso. No constituye una demanda en su contra. No se trata del ofrecimiento de un abogado.

- Se ha alcanzado una Conciliación en una demanda colectiva contra Fandom, Inc. En la demanda colectiva se alega que el Demandado, Fandom, Inc., instaló y utilizó tres rastreadores —el rastreador GumGum, el rastreador Audiencerate y el rastreador TripleLift (los “Rastreadores”)— en los navegadores de Internet de los visitantes del Sitio Web, sin obtener el consentimiento y en violación de la Sección 638.51(a) de la Ley de Invasión de Privacidad de California (California Invasion of Privacy Act, “CIPA”).
- Se lo incluye si usted es una persona que accedió a www.gamespot.com o a cualquiera de sus subdominios en el estado de California desde el 5 de enero de 2023 hasta el 16 de diciembre de 2025.
- Las personas incluidas en la Conciliación serán elegibles para recibir una parte *prorrataeda* (es decir, igual) del Fondo de la Conciliación.
- Lea este aviso detenidamente. Independientemente de que usted actúe o no, sus derechos legales se verán afectados.

SUS DERECHOS Y OPCIONES LEGALES EN ESTA CONCILIACIÓN	
ENVIAR UN FORMULARIO DE RECLAMO A MÁS TARDAR EL 16 DE ABRIL DE 2026	Esta es la única forma de recibir un pago.
EXCLUIRSE A MÁS TARDAR EL 17 DE MARZO DE 2026	No recibirá beneficios, pero conservará cualquier derecho que tenga actualmente de presentar una demanda contra el Demandado sobre los reclamos de este caso.
OBJETAR A MÁS TARDAR EL 17 DE MARZO DE 2026	Le escribe al Tribunal para explicar el motivo por el cual no le satisface la Conciliación.
ASISTIR A LA AUDIENCIA EL 19 DE MAYO DE 2026	Solicita hablar ante el Tribunal acerca de su opinión sobre la Conciliación.
NO HACER NADA	No recibirá parte de los beneficios de la Conciliación y renunciará a sus derechos de presentar una demanda contra el Demandado sobre los reclamos de este caso.

En este Aviso se explican sus derechos y opciones, **así como los plazos para ejercerlos.**

¿Tiene alguna pregunta? Llame sin cargo al 1-877-714-5775 o visite www.GameSpotSettlement.com

INFORMACIÓN BÁSICA

1. ¿Por qué se emitió este Aviso?

Un tribunal autorizó este Aviso porque usted tiene derecho a conocer la Conciliación que ha sido propuesta para esta demanda colectiva y todas sus opciones antes de que el tribunal decida si dar o no la aprobación definitiva a la Conciliación. En este Aviso se explican la demanda, la Conciliación y sus derechos legales.

La Honorable Rita F. Lin, del Tribunal de Distrito de los Estados Unidos para el Distrito Norte de California, está a cargo de este caso. El caso se llama *Shah v. Fandom, Inc.*, caso n.º 3:24-cv-01062-RFL. La persona que presentó la demanda se denomina Demandante. El Demandado es Fandom, Inc.

2. ¿Qué es una demanda colectiva?

En una demanda colectiva, una o más personas conocidas como representantes del grupo de demandantes (en este caso, Vishal Shah y Jayden Kim) presentan una demanda en representación de un conjunto o “grupo” de personas que tienen reclamos similares. En una demanda colectiva, el tribunal resuelve los asuntos para todos los miembros del grupo de demandantes, excepto para quienes se hayan excluido del Grupo de Demandantes.

3. ¿De qué trata esta demanda?

En esta Demanda se alega que el Demandado, Fandom, Inc., instaló y utilizó tres rastreadores —el rastreador GumGum, el rastreador Audiencerate y el rastreador TripleLift (los “Rastreadores”)— en los navegadores de Internet de los visitantes del Sitio Web, sin obtener el consentimiento y en violación de la Sección 638.51(a) de la Ley de Invasión de Privacidad de California (“CIPA”). El Demandado niega haber violado una ley. El Tribunal no ha determinado quién tiene razón. En su lugar, las partes han decidido llegar a una conciliación en relación con la demanda para evitar la incertidumbre y los gastos asociados con la continuación del litigio.

4. ¿Por qué existe una Conciliación?

El Tribunal no ha decidido si el Demandante o el Demandado debe ganar este caso. En su lugar, ambas partes llegaron a una Conciliación. De esa manera, evitan la incertidumbre y los gastos asociados con la continuación del litigio y los Miembros del Grupo de Demandantes obtendrán una compensación más rápida, en lugar de obtenerla, en caso de que ganaran, luego de la finalización de un juicio.

¿QUIÉNES ESTÁN INCLUIDOS EN LA CONCILIACIÓN?

5. ¿Cómo sé si formo parte del Grupo de Demandantes de la Conciliación?

El **Grupo de Demandantes de la Conciliación** se define de la siguiente manera:

Todas las personas que accedieron a www.gamespot.com y sus subdominios (el “Sitio Web”) en California y cuyas direcciones IP fueron recopiladas por los Rastreadores entre el 5 de enero de 2023 y el 16 de diciembre de 2025 inclusive.

**¿Tiene alguna pregunta? Llame sin cargo al 1-877-714-5775 o visite
www.GameSpotSettlement.com**

LOS BENEFICIOS DE LA CONCILIACIÓN

6. ¿Qué establece la Conciliación?

El Demandado ha creado un Fondo de la Conciliación que alcanza un total de \$1,200,000.00. Los pagos para los Miembros del Grupo de Demandantes, el costo por gestionar la Conciliación, el costo por informar a las personas sobre la Conciliación, los honorarios de los abogados y el pago para el Representante del Grupo de Demandantes también provendrán de este fondo (*consulte la Pregunta 13*).

7. ¿A cuánto ascenderá mi pago?

Si usted es Miembro del Grupo de Demandantes de la Conciliación, puede completar y enviar un Formulario de Reclamo para recibir una parte del Fondo de la Conciliación. El monto de este pago dependerá de cuántos de los Miembros del Grupo de Demandantes presenten reclamos válidos. Cada uno de los Miembros del Grupo de Demandantes que presente un reclamo válido recibirá una parte proporcional del Fondo de la Conciliación

8. ¿Cuándo recibiré mi pago?

La audiencia para considerar la imparcialidad de la Conciliación está programada para el 19 de mayo de 2026. Si el Tribunal aprueba la Conciliación, los Miembros del Grupo de Demandantes elegibles cuyos reclamos hayan sido aprobados por el Administrador de la Conciliación recibirán un pago 90 días después de que la Conciliación se haya aprobado de manera definitiva y/o se complete cualquier proceso de apelación. El pago se realizará mediante cheque, a menos que usted haya elegido recibir el pago mediante PayPal o Venmo, y todos los cheques vencerán y serán nulos 180 días después de su emisión.

OBTENER BENEFICIOS

9. ¿Cómo recibo un pago?

Si usted es Miembro del Grupo de Demandantes y desea obtener un pago, **debe** completar y enviar un Formulario de Reclamo a más tardar el **16 de abril de 2026**. Los Formularios de Reclamo se pueden encontrar y enviar en línea en www.GameSpotSettlement.com, o imprimiendo y enviando por correo un Formulario de Reclamo en papel, cuyas copias se pueden descargar en www.GameSpotSettlement.com.

También le recomendamos que envíe su reclamo en línea. No solo es más fácil y más seguro, sino que es completamente gratis y solo le llevará unos minutos.

PERMANECER EN LA CONCILIACIÓN

10. ¿A qué renuncio si permanezco en el Grupo de Demandantes?

Si la Conciliación es definitiva, usted renunciará a su derecho de demandar al Demandado por los reclamos que se resuelvan en esta Conciliación. En el Acuerdo de Conciliación se describen los

**¿Tiene alguna pregunta? Llame sin cargo al 1-877-714-5775 o visite
www.GameSpotSettlement.com**

reclamos específicos contra el Demandado a los que usted renuncia. Usted “eximirá” al Demandado y a algunas de sus filiales descritas en la Sección 1.23 del Acuerdo de Conciliación. A menos que usted se excluya (*consulte* la Pregunta 14), “renunciará” a los reclamos, independientemente de si presenta un reclamo o no. El Acuerdo de Conciliación se encuentra disponible en el enlace “documentos del tribunal” en el sitio web.

En el Acuerdo de Conciliación se describen los reclamos a los que usted renuncia con detalles específicos; por lo tanto, léalo detenidamente. Si tiene preguntas, puede hablar con los abogados enumerados en la Pregunta 12 de manera gratuita, o puede, por supuesto, hablar con su propio abogado si tiene preguntas sobre lo que significa esto.

11. ¿Qué sucede si no hago nada?

Si no hace nada, no recibirá ningún beneficio de esta Conciliación. Sin embargo, a menos que se excluya, no podrá comenzar una demanda ni ser parte de una demanda contra el Demandado por los reclamos que se resuelvan en esta Conciliación.

LOS ABOGADOS QUE LO REPRESENTAN

12. ¿Tengo un abogado en este caso?

El Tribunal ha designado al bufete de abogados Bursor & Fisher, P.A. para que sean los abogados que representan al Grupo de Demandantes de la Conciliación. Se les denomina “Abogados del Grupo de Demandantes”. Luego de realizar una investigación exhaustiva, estos abogados consideran que el Acuerdo de Conciliación es justo, razonable y beneficioso para el Grupo de Demandantes de la Conciliación. No se le cobrará por los servicios de estos abogados. Si desea ser representado por su propio abogado en este caso, puede contratar uno por su propia cuenta.

13. ¿Cómo se pagará a los abogados?

Los honorarios, costos y gastos de los Abogados del Grupo de Demandantes se pagarán con dinero del Fondo de la Conciliación y el monto que será determinado y adjudicado por el Tribunal. Los Abogados del Grupo de Demandantes no podrán solicitar más de un tercio del Fondo de la Conciliación de \$1.2 millones, pero el Tribunal podrá otorgar un monto menor.

Según lo aprobado por el Tribunal, los Representantes del Grupo de Demandantes recibirán un Pago de Incentivo, proveniente del Fondo de la Conciliación, por ayudar a presentar y resolver el caso. Los Representantes del Grupo de Demandantes podrán solicitar hasta \$5,000 como pago de incentivo, pero el Tribunal podrá otorgar un monto menor.

EXCLUIRSE DE LA CONCILIACIÓN

14. ¿Cómo me excluyo de la Conciliación?

Para excluirse de la Conciliación, debe enviar por correo, o entregar de otra manera, una carta (o solicitud de exclusión) en la que indique que desea ser excluido de la Conciliación de *Shah v. Fandom, Inc.*, caso n.º 3:24-cv-01062-RFL. Su carta o solicitud de exclusión también debe incluir su nombre, dirección, firma, nombre y número de este caso, y una declaración de que desea que lo excluyan. Debe enviar por correo o entregar la solicitud de exclusión a más tardar el **17 de marzo de 2026** a:

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PO Box 6787
Portland, OR 97228-6787

15. Si no me excluyo, ¿puedo demandar al Demandado por este mismo asunto en el futuro?

No. A menos que se excluya, usted renuncia a todo derecho de presentar una demanda contra el Demandado por los reclamos que se resuelvan en esta Conciliación.

16. Si me excluyo, ¿puedo obtener algo de esta Conciliación?

No. Si se excluye, no presente el Formulario de Reclamo para solicitar beneficios.

OBJETAR LA CONCILIACIÓN

17. ¿Cómo presento una objeción a la Conciliación?

Puede solicitarle al Tribunal que no haga lugar a la aprobación al presentar una objeción. No puede pedirle al Tribunal que ordene una Conciliación diferente; el Tribunal solo puede aprobar o rechazar la Conciliación. Si el tribunal rechaza la aprobación, no se repartirán los pagos de la Conciliación y la demanda continuará. Si eso es lo que usted desea que pase, debe objetar.

Para presentar una objeción, debe enviar al Tribunal una carta o informe en el que indique que objeta la Conciliación de *Shah v. Fandom, Inc.*, caso n.º 3:24-cv-01062-RFL, e identificar todos los motivos para sus objeciones (incluidas citas y pruebas de respaldo) y adjuntar cualquier material en el que usted base sus objeciones. Su carta o informe también debe incluir su nombre; el fundamento por el cual usted afirma ser un Miembro del Grupo de Demandantes de la Conciliación; el nombre y la información de contacto de todos y cada uno de los abogados que lo representan, asesoran o le ayudan de alguna manera en relación con su objeción; y su firma. Si usted, o alguno de los abogados que lo asista con su objeción, alguna vez ha objetado alguna conciliación de demanda colectiva en relación con la que usted o el abogado objetante hayan solicitado o recibido un pago a cambio de la desestimación de la objeción (o cualquier apelación relacionada) sin modificar la conciliación, debe incluir una declaración en su objeción en donde indique el nombre completo del caso. También debe enviar por correo o entregar una copia de su carta o escrito a los Abogados del Grupo de Demandantes y a los Abogados del Demandado indicados más adelante.

Los Abogados del Grupo de Demandantes presentarán una solicitud de honorarios al Tribunal y la publicarán en este sitio web a más tardar el 2 de marzo de 2026.

Si usted desea comparecer y hablar en la Audiencia de Aprobación Definitiva para objetar la Conciliación, con un abogado o sin este (se explica a continuación en la respuesta a la Pregunta 21), debe indicarlo en su carta o informe. Presente la objeción ante el Tribunal y envíe una copia a los Abogados del Grupo de Demandantes y al Abogado del Demandado, con fecha de franqueo postal no posterior al **17 de marzo de 2026**. Sin perjuicio de estos requisitos, previa presentación de una causa justificada ante el Tribunal, cualquier Miembro del Grupo de Demandantes de la Conciliación que se oponga podrá comparecer, en persona o mediante un abogado, en la Audiencia de Aprobación Definitiva que celebre el Tribunal.

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www.GameSpotSettlement.com**

TRIBUNAL	ABOGADOS DEL GRUPO	ABOGADOS DEL DEMANDADO
Hon. Rita F. Lin San Francisco Courthouse, Courtroom 15 450 Golden Gate Ave. San Francisco, CA 94102	Max S. Roberts Bursor & Fisher PA 1990 North California Blvd., 9th Floor Walnut Creek, CA 94596	Ryan Tyz Tyz Law Group PC 4 Embarcadero Center, 14th Fl. San Francisco, CA 94111

18. ¿Cuál es la diferencia entre objetar la Conciliación y excluirme de la Conciliación?

Objetar es sencillamente decirle al Tribunal que a usted no le gusta algo de la Conciliación. Solamente puede objetar si permanece en el Grupo de Demandantes. Al excluirse, le comunica al Tribunal que no desea ser parte del Grupo de Demandantes. Si se excluye, no tiene ningún fundamento para presentar una objeción, puesto que el caso ya no le afecta.

AUDIENCIA DE APROBACIÓN DEFINITIVA DEL TRIBUNAL

19. ¿Cuándo y dónde decidirá el Tribunal si aprueba la Conciliación?

El Tribunal celebrará una Audiencia de Aprobación Definitiva el **19 de mayo de 2026 a la 1:30 p. m. Hora del Pacífico**, en la Sala 3 del Tribunal Federal de los EE. UU. sito en 450 Golden Gate Ave., San Francisco, CA 94102. La audiencia también se llevará a cabo a través de Zoom en <https://cand.uscourts.gov/judges/rfl/lin-rita-f>.

El propósito de la audiencia será que el Tribunal determine si aprueba la Conciliación como justa, razonable, adecuada y beneficiosa para el Grupo de Demandantes; que considere la solicitud de los Abogados del Grupo de Demandantes de recibir compensación por honorarios y gastos, y que considere la solicitud de un Pago de Incentivo para los Representantes del Grupo de Demandantes. En esta audiencia, el Tribunal estará dispuesto a escuchar objeciones y argumentos respecto de la imparcialidad de la Conciliación.

La audiencia podrá posponerse para otra fecha u horario sin aviso; por lo que le recomendamos que revise la información en www.GameSpotSettlement.com. Si, sin embargo, objetó de manera oportuna la Conciliación y le informó al Tribunal que tiene la intención de comparecer y hablar en la Audiencia de Aprobación Definitiva, recibirá un aviso sobre cualquier cambio en la fecha de dicha audiencia.

20. ¿Debo asistir a la audiencia?

No. El Abogado del Grupo de Demandantes responderá cualquier pregunta que pudiera tener el Tribunal, pero usted puede asistir por su cuenta. Si presenta una objeción o comentario, no tiene que presentarse en el Tribunal para hablar sobre ella. Siempre que presente su objeción por escrito y la envíe por correo oportunamente, el tribunal la considerará. Usted también puede pagar a otro abogado para que asista a la audiencia, pero no es necesario que lo haga.

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www.GameSpotSettlement.com**

21. ¿Puedo hablar en la audiencia?

Sí. Puede solicitar la autorización del Tribunal para hablar en la Audiencia de imparcialidad. Para hacerlo, debe incluir en su carta o informe en donde objete la Conciliación una declaración que indique que es su “Aviso de intención de comparecer en *Shah v. Fandom, Inc.*, caso n.º 3:24-cv-01062-RFL.” Debe incluir su nombre, dirección, número de teléfono y firma, como también el nombre y la dirección de su abogado, si habrá un abogado que comparezca por usted. Debe presentar ante el Tribunal su aviso de intención de comparecer con fecha de franqueo postal no posterior al **7 de mayo de 2026** y debe enviarlo a las direcciones enumeradas en la Pregunta 17. Sin perjuicio de estos requisitos, previa presentación de una causa justificada ante el Tribunal, cualquier Miembro del Grupo de Demandantes de la Conciliación que se oponga podrá comparecer, en persona o mediante un abogado, en la Audiencia de Aprobación Definitiva que celebre el Tribunal. Debe presentar ante el Tribunal su objeción con fecha de franqueo postal no posterior al **17 de marzo de 2026** y debe enviarla a las direcciones enumeradas en la Pregunta 17.

CÓMO OBTENER MÁS INFORMACIÓN

22. ¿Dónde obtengo más información?

En este aviso se resume la conciliación propuesta. Para conocer los términos precisos de la Conciliación, consulte el Acuerdo de Conciliación disponible en www.GameSpotSettlement.com; comuníquese con los Abogados del Grupo de Demandantes escribiendo a info@bursor.com o accediendo al expediente del Tribunal en este caso, por un cargo, mediante el sistema de Acceso público a los registros electrónicos judiciales del tribunal (Court’s Public Access to Court Electronic Records, PACER) en <https://ecf.cand.uscourts.gov>; o visitando la oficina del secretario judicial del Tribunal para el Tribunal de Distrito de los Estados Unidos para el distrito norte de California, 450 Golden Gate Ave., San Francisco, CA 94102, entre las 9:00 a. m. y las 4:00 p. m., de lunes a viernes, excluidos los feriados del Tribunal.

NO LLAME POR TELÉFONO AL TRIBUNAL O A LA OFICINA DEL SECRETARIO DEL TRIBUNAL PARA INFORMARSE ACERCA DE LA PRESENTE CONCILIACIÓN O EL PROCESO DE RECLAMACIONES.

**¿Tiene alguna pregunta? Llame sin cargo al 1-877-714-5775 o visite
www.GameSpotSettlement.com**

Attachment 8

PayPal

PayPal Phone Number

- -

PayPal Email:

If you select the option to receive a physical check and your claim is determined to be valid, the settlement payment will be mailed to the mailing address provided on your claim submission.

PART THREE: ATTESTATION

I declare under penalty of perjury under the laws of the United States and the laws of my state of residence that the information supplied in this Claim Form is true and correct to the best of my knowledge. I affirm that I visited www.gamespot.com and its subdomains in California from January 5, 2023, to December 16, 2025.

I understand that my Claim Form may be subject to audit, verification, and review and that if it is incomplete, untimely, or contains false information, it may be rejected.

Signature:

Date: - -
MM DD YYYY

Please keep a copy of your Claim Form for your records.

Attachment 9

Shah v. Fandom, Inc.
U.S. District Court for the Northern District of California
Caso n.º 3:24-cv-01062-RFL

Formulario de Reclamo de la Conciliación

PARA RECIBIR UN PAGO EN EFECTIVO DEL FONDO DE LA CONCILIACIÓN, USTED DEBE COMPLETAR ESTE FORMULARIO DE RECLAMO Y PRESENTARLO EN LÍNEA A MÁS TARDAR EL 16 DE ABRIL DE 2026 O ENVIARLO POR CORREO CON FECHA DE FRANQUEO POSTAL A MÁS TARDAR DEL 16 DE ABRIL DE 2026.

Lea detenidamente el aviso completo de esta Conciliación (disponible en GameSpotSettlement.com) antes de completar este Formulario de Reclamo.

Para ser elegible para recibir los beneficios de la conciliación que se obtengan en esta demanda colectiva, debe completar y presentar en línea o enviar por correo postal este Formulario de Reclamo. Cada Miembro del Grupo de Demandantes tiene derecho a presentar solo un Formulario de Reclamo.

EN LÍNEA: GameSpotSettlement.com

CORREO POSTAL: GameSpot CIPA Settlement
P.O. Box 6787
Portland, OR 97228-6787

PARTE UNO: INFORMACIÓN DEL DEMANDANTE

Proporcione su nombre e información de contacto a continuación. Es su responsabilidad notificar al Administrador de la Conciliación sobre cualquier cambio en su información de contacto después de la presentación de su Formulario de Reclamo.

Nombre	Inicial del segundo nombre	Apellido
<input type="text"/>	<input type="text"/>	<input type="text"/>
Calle		
<input type="text"/>		
Ciudad	Estado	Código postal
<input type="text"/>	<input type="text"/>	<input type="text"/>
Dirección de correo electrónico		
<input type="text"/>		

PARTE DOS: SELECCIÓN DE PAGO

Seleccione **una** de las siguientes opciones de pago:

- Cheque físico
- Venmo

Número de teléfono de Venmo:

 - -

Correo electrónico de Venmo:

**¿TIENE ALGUNA PREGUNTA? VISITE GAMESPOTSETTLEMENT.COM
O LLAME SIN CARGO AL 1-877-714-5775.**

PayPal

Número de teléfono de PayPal:

- -

Correo electrónico de PayPal:

Si selecciona la opción de recibir un cheque físico y se determina que su reclamo es válido, el pago de la conciliación se enviará por correo a la dirección postal proporcionada en la presentación de su reclamo.

PARTE TRES: CERTIFICACIÓN

Declaro, bajo pena de perjurio en virtud de las leyes de los Estados Unidos y las leyes de mi estado de residencia, que, a mi leal saber y entender, la información proporcionada en este Formulario de Reclamo es verdadera y correcta. Afirmo que visité www.gamespot.com y sus subdominios en California del 5 de enero de 2023 al 16 de diciembre de 2025.

Comprendo que es posible que mi Formulario de Reclamo se someta a auditoría, verificación y revisión, y que, en caso de que esté incompleto, se haya presentado fuera de término o contenga información falsa, se lo podrá rechazar.

FIRMA

FECHA

- -
MM DD AAAA

Conserve una copia de su Formulario de Reclamo para sus registros.

**¿TIENE ALGUNA PREGUNTA? VISITE GAMESPOTSETTLEMENT.COM
O LLAME SIN CARGO AL 1-877-714-5775.**

Attachment 10



Exclusion Report
Gamespot CIPA Settlement

Number	TN
1	XXX054