

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NOTICE OF PENDENCY OF CLASS ACTION

**If You Purchased Facebook or Instagram Advertisements Between August 15, 2015, and
October 27, 2021,
A Class Action Lawsuit May Affect Your Rights.**

A federal court authorized this Notice. It is not a solicitation from a lawyer. You are not being sued.

*La información proporcionada en este aviso está disponible en español en
www.FacebookPotentialReachLawsuit.com.*

- A lawsuit is pending in the United States District Court for the Northern District of California (the “Court”) against Meta Platforms, Inc. (“Facebook” or “Defendant”).
- Plaintiffs in the lawsuit allege that Facebook made misrepresentations and omissions when providing the Potential Reach metric to advertisers. Plaintiffs allege Facebook inflated its potential advertising reach to consumers, and charged artificially high premiums for ad placements. Facebook’s Potential Reach was expressed as a number of people. Plaintiffs allege that the Potential Reach metric was not actually an estimate of people, but an estimate of “accounts.” Plaintiffs allege that, because the number of unique accounts and unique people were different, this led to an inaccurate representation of how many people Class Members’ advertisements could reach. Plaintiffs allege that the discrepancy between people and accounts made the Potential Reach number inaccurate.
- Facebook denies all of Plaintiffs’ allegations. While Facebook no longer provides Potential Reach estimates to advertisers, Facebook maintains that it provided accurate and informative disclosures about Potential Reach when it was available, including that it informed advertisers that despite Facebook’s efforts to deduplicate accounts, there were some users who had multiple accounts which may have impacted Potential Reach estimates. Facebook denies that any Class Member has been damaged. Facebook did not charge advertisers based on Potential Reach estimates, but instead charged based on actual results which were provided in real time to advertisers. The Court has not made any determination as to who is right.
- On March 29, 2022, the Court determined this case could proceed as a class action. This is not a determination about the merits of the claim, only that Plaintiffs may seek to prove their claims on behalf of the Class.
- There is no money available now, and no guarantee there will be.
- Your legal rights are affected, and your options are explained below. You have a choice to make now.

CERTIFIED CLASS

The Class certified by the Court (hereinafter referred to as the “Class”) includes the following persons and entities:

- **All United States residents (including natural persons and incorporated entities) who, from August 15, 2015, to October 27, 2021 (“Class Period”), paid for the placement of at least one advertisement on Facebook’s platforms, including the Facebook and Instagram platforms, which was purchased through Facebook’s Ads Manager or Power Editor.**
- **Excluded from the Class are: (1) advertisements purchased pursuant to agreements other than Facebook’s Terms of Service or Statement of Rights and Responsibilities; (2) advertisements purchased using only non-lookalike Custom Audiences as the targeting criteria; (3) advertisements purchased using Reach and Frequency buying; (4) advertisements purchased with the objectives of canvas app engagement, canvas app installs, offer claims, event responses, page likes, or external; and (5) advertisements for which Facebook provided a Potential Reach lower than 1,000.**

- Also excluded from the Class are Defendant, any entity in which Defendant has a controlling interest, and Defendant’s officers, directors, legal representatives, successors, subsidiaries, and assigns. Further excluded from the Class is any judge, justice, or judicial officer presiding over this matter and the members of their immediate families and judicial staff.

YOUR LEGAL RIGHTS AND OPTIONS	
DO NOTHING	This option means that, if you are a Class Member, you remain part of the Class and you keep the possibility of getting money or benefits that may come from a trial or a settlement and will be bound by any judgment entered or settlement reached in the lawsuit, whether favorable or unfavorable. But you give up all rights to be part of any other lawsuit that asserts claims related to the allegations or claims against Facebook in this case.
EXCLUDE YOURSELF FROM THE CLASS	This option allows you to exclude yourself from the Class and retain the right to file a lawsuit against Facebook asserting claims relating to the allegations in this case. If you exclude yourself, you will not be bound by any judgment for or against Facebook and will not share in any money or benefits obtained for the Class. The exclusion deadline is July 28, 2025.

BASIC INFORMATION ABOUT THE LAWSUIT

1. What is the lawsuit about?

Plaintiffs in the lawsuit allege that Facebook made misrepresentations and omissions when providing the Potential Reach metric to advertisers. Plaintiffs allege Facebook inflated its potential advertising reach to consumers, and charged artificially high premiums for ad placements. Facebook’s Potential Reach was expressed as a number of people. Plaintiffs allege that Potential Reach metric was not actually an estimate of people, but an estimate of “accounts.” Plaintiffs allege that, because the number of unique accounts and unique people were different, this led to an inaccurate representation of how many people Class Members’ advertisements could reach. Plaintiffs allege that the discrepancy between people and accounts made the Potential Reach number inaccurate.

Plaintiffs bring claims for damages under California law for (1) fraudulent misrepresentation and (2) fraudulent concealment.

2. What is Facebook’s response?

Facebook denies all of Plaintiffs’ allegations. While Facebook no longer provides Potential Reach estimates to advertisers, Facebook maintains that it provided accurate and informative disclosures about Potential Reach when it was available, including that it informed advertisers that despite Facebook’s efforts to deduplicate accounts, there were some users who had multiple accounts which may have impacted Potential Reach estimates. Facebook denies that any Class Member has been damaged. Facebook did not charge advertisers based on Potential Reach estimates, but instead charged based on actual results which were provided in real time to advertisers.

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

In a class action lawsuit, a person called a “Class Representative” sues on behalf of other people who have similar claims. The people together are a “Class” or “Class Members.” The Class Representatives who sued—and all the Class Members like them—are called the Plaintiffs. The company they sued (in this case, Meta Platforms, formerly known as Facebook) is called the Defendant. One court decides the issues for everyone in the Class—except for those people who choose to exclude themselves from the Class.

4. Why is this lawsuit a class action?

The Court decided that certain claims in this lawsuit can move forward in a class action because the claims of the Class Members are similar enough that trying them all together is fair and more efficient than trying them separately.

5. Is there any money available now?

No money or benefits are available now because the case is not resolved. There is no guarantee that money or benefits will ever be obtained. If they are, you will be notified about how to ask for a share. If the litigation is resolved, and you have not excluded yourself pursuant to this Notice, you may not be given another opportunity to do so.

DETERMINING IF YOU ARE A MEMBER OF THE CLASS

6. I purchased advertisements from Facebook. How do I know if I am a member of the Class?

The following are members of the Class:

- Subject to the exclusions below, United States residents (including natural persons and incorporated entities) who, from August 15, 2015, to October 27, 2021 (“Class Period”), paid for the placement of at least one advertisement on Facebook’s platforms, including the Facebook and Instagram platforms, which was purchased through Facebook’s Ads Manager or Power Editor.

The following are **NOT** members of the Class:

- Purchasers whose advertisements *all* met at least one of the following five criteria: (1) advertisements purchased pursuant to agreements other than Facebook’s Terms of Service or Statement of Rights and Responsibilities; (2) advertisements purchased using only non-lookalike Custom Audiences as the targeting criteria; (3) advertisements purchased using Reach and Frequency buying; (4) advertisements purchased with the objectives of canvas app engagement, canvas app installs, offer claims, event responses, page likes, or external; and (5) advertisements for which Facebook provided a Potential Reach lower than 1,000.
- Defendant, any entity in which Defendant has a controlling interest, and Defendant’s officers, directors, legal representatives, successors, subsidiaries, and assigns. Any judge, justice, or judicial officer presiding over this matter and the members of their immediate families and judicial staff.

IF YOU DO NOTHING

7. What happens if I do nothing at all?

As a Class Member, unless you exclude yourself from the Class in the manner described in the section below titled “EXCLUDING YOURSELF FROM THE CLASS,” you will be bound by any judgment entered or settlement reached in this lawsuit, whether favorable or unfavorable. Unless you exclude yourself, you will not be able to file a lawsuit or be part of any other lawsuit asserting claims against Facebook concerning or relating to the claims and factual allegations that were or could have been raised in this action.

EXCLUDING YOURSELF FROM THE CLASS

8. What does it mean to request to be excluded from the Class?

If you do not want to be part of the Class and want to keep your right to sue Facebook relating to the allegations concerning the alleged conduct described in this Notice, then you must take steps to remove yourself from the Class. This is called excluding yourself, or “opting out.” The Court will exclude any person who asks to be excluded. If you exclude yourself, you will not be eligible to receive any payment from future settlements or judgments in this lawsuit, and you will not be bound by any judgment rendered for or against Facebook.

9. How do I exclude myself from the Class?

To exclude yourself from the Class, you must either send a request by mail or through the case website stating that you wish to be excluded from the Class in *DZ Reserve, et al. v. Meta Platforms, Inc.*, Case No. 3:18-cv-04978.

If you mail your Request for Exclusion, it must be postmarked no later than July 28, 2025, to:

Facebook Potential Reach Class Action
Attn: Exclusions
c/o A.B. Data, Ltd.
P.O. Box 173105
Milwaukee, WI 53217
info@FacebookPotentialReachLawsuit.com

If you mail your Request for Exclusion, be sure to include your name, address, telephone number, and signature.

To request exclusion through the case website, please visit www.FacebookPotentialReachLawsuit.com and click on the Request for Exclusion tab. The Request for Exclusion must be submitted no later than July 28, 2025.

10. If I don’t exclude myself, can I sue later?

No. Unless you exclude yourself, you give up the right to sue Facebook for the claims in this case. You must exclude yourself from the Class to be able to bring your own, separate lawsuit(s) against Facebook. Remember, the exclusion deadline is July 28, 2025. In the event the lawsuit resolves, you may not be given another opportunity to exclude yourself from the Class.

THE LAWYERS REPRESENTING YOU

11. As a member of the Class, do I have a lawyer representing my interests in this class action?

Yes. The Court has appointed lawyers to represent the members of the Class. These lawyers are called Class Counsel. The following lawyers are lead counsel in representing the Class:

Geoffrey A. Graber

Andrew N. Friedman

Karina G. Puttieva

Madelyn Petersen

Jenna Waldman

**COHEN MILSTEIN SELLERS &
TOLL PLLC**

1100 New York Ave. NW

Suite 800

Washington, DC 20005

Theodore J. Leopold

Leslie M. Kroeger

**COHEN MILSTEIN SELLERS &
TOLL PLLC**

11780 U.S. Highway One

Suite N500

Palm Beach Gardens, FL 33408

Eric A. Kafka

**COHEN MILSTEIN SELLERS &
TOLL PLLC**

88 Pine Street

14th Floor

New York, NY 10005

Charles Reichmann

LAW OFFICES OF

CHARLES REICHMANN

16 Yale Circle

Kensington, CA 94708-1015

12. How will the lawyers be compensated?

In the event of a judgment against Facebook at trial or by settlement, Class Counsel will ask the Court to approve and award attorneys' fees and expenses. The amount of these fees and costs, if any, will ultimately be determined by the Court.

13. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on behalf of the Class. You may, however, hire your own lawyer to represent you if you wish. If you hire your own lawyer, he or she must file a Notice of Appearance. If you hire your own lawyer, you will have to pay for that lawyer on your own.

THE TRIAL

14. When and where is the trial?

Class Counsel will have to prove the Plaintiffs' allegations at trial. The Court has scheduled a jury trial to begin on October 14, 2025. The trial will be held in the United States District Court, Northern District of California, located at Courtroom 11, 19th Floor, 450 Golden Gate Avenue, San Francisco CA 94102. During the trial, a Jury and the Judge will hear all the evidence to help them reach a decision whether Plaintiffs or Facebook is right about the allegations in the lawsuit. There is no guarantee that Plaintiffs will win or that they will be able to get money for all or some of the members of the Class.

15. Do I have to come to trial?

You do not need to attend trial. Class Counsel will present the case for the Plaintiffs, and Facebook will present the defense. You or your lawyer are welcome to attend at your own expense.

16. Will I get money after the trial?

If the Plaintiffs obtain money or benefits as a result of the lawsuit, you will be notified about how to participate. We do not know how long this will take.

GETTING MORE INFORMATION

17. Where do I get more information?

This Notice contains a summary of relevant Court papers. You can review relevant Decisions and Orders and additional information about this action on the case website at www.FacebookPotentialReachLawsuit.com. You may also contact the Notice Administrator by mail, email, or phone using the following contact information:

Facebook Potential Reach Class Action
c/o A.B. Data, Ltd.
P.O. Box 173105
Milwaukee, WI 53217
info@FacebookPotentialReachLawsuit.com
888-206-2123

PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS CASE.

DATED: APRIL 10, 2025

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