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

DZ Reserve and Cain Maxwell (d/b/a Max  
Martialis), individually and on behalf of  
others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:18-cv-04978-JD

~~PROPOSED~~ ORDER GRANTING  
PLAINTIFFS' MOTION FOR  
APPROVAL OF CLASS NOTICE PLAN

Hon. James Donato

**PROPOSED ORDER**

After considering Plaintiffs' Motion for Approval of Class Notice Plan, Dkt. No. 470, Court finds that the proposed method of providing notice to the certified Class satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure and due process.

The Court **GRANTS** the Motion and directs the parties to implement the Notice Plan as set forth in Plaintiffs' Motion and as follows:

1. The Firm A.B. Data, Ltd. ("Notice Administrator") is appointed and authorized to supervise and administer the Notice Plan. The Notice Administrator shall execute the Notice Plan as proposed in the Declaration of Eric Schachter Regarding Notice Administration ("Schachter Declaration").

2. Within fourteen calendar days after entry of this Order, or by April 28, 2025, whichever occurs later, Defendant Meta Platforms, Inc. ("Meta") shall produce to the Notice Administrator a list, in electronic form, of the email addresses for all Class members ("Email List").

3. Within fourteen calendar days after entry of this Order, or by April 28, 2025, whichever occurs later, the Notice Administrator shall create a case website, and post on that case website the long-form notice of pendency of class action, relevant Court documents, procedural posture and a summary of the case, important dates, and any pertinent updates concerning the case.

4. Within fourteen calendar days after entry of this Order, or by April 28, 2025, whichever occurs later, Meta shall direct notice as described in the Schachter Declaration to class members with active accounts via Facebook Business Manager and Business Suite, and via Facebook Ads Manager; provided, however, that such notice shall not be provided until the case website has been created (but no later than 7 days after the website is created).

5. Within 30 calendar days of its receipt of Meta's Email List (the "Notice Date"), the Notice Administrator shall: (1) commence dissemination of the short-form notice of this action in accordance with the Schachter Declaration to each email address included on the Email List; (2) cause the short-form notice to be published on one occasion in a press release over PR Newswire; and (3) cause the short-form notice to be published in the *Wall Street Journal* and *Advertising Age*

(or similar publications). The Notice Administrator shall also take reasonable measures, including online targeted advertising, as described in the Schachter Declaration, to maximize the number of relevant visitors to the case website.

6. The Exclusion Requests from the Class shall be made by submitting a written request for exclusion as set forth in the long-form Notice and shall be postmarked or timestamped (for online submissions) within 60 days after the Notice date.

7. Within 30 calendar days following the deadline for Exclusion Requests, Plaintiffs' counsel shall file all such Exclusion Requests with the Court.

**IT IS SO ORDERED.**

Dated: April 10, 2025



HON. JAMES DONATO  
UNITED STATES DISTRICT COURT JUDGE