

Purchased Facebook or Instagram Advertisements Between August 15, 2015, and October 27, 2021?

A Class Action Lawsuit May Affect Your Rights.

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

Your rights may be affected by a class action lawsuit regarding Facebook advertisements. The case name is *DZ Reserve, et al. v. Meta Platforms, Inc.*, and the case number is Case No. 3:18-cv-04978. Plaintiffs in the lawsuit allege that Meta Platforms, Inc. (“Facebook” or “Defendant”) 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 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 or whether Facebook did anything wrong, but has decided that this case should proceed as a class action on behalf of a “Class,” or a group of people that could include you.

This Notice is only a summary of your rights and options before any decision is reached on which party is right. If you’re included in the Class, you have to decide whether to (1) stay in the Class and be bound by whatever results in the case, or (2) ask to be excluded and keep your right to individually sue Facebook. For additional details, please read the Long-Form Notice available to download at www.FacebookPotentialReachLawsuit.com.

Who is in the Class?

You are a member of the Class if:

- Subject to the exclusions below, you are a United States resident (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.
- At least one of the advertisements that you paid for does not meet any 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.

A more detailed Notice, including the exact Class definitions and exceptions to Class membership, is available at www.FacebookPotentialReachLawsuit.com.

Your Rights and Options

DO NOTHING: If you are a Class Member and do nothing, you are choosing to stay in the Class and you will be able to share in any money or benefits that may be recovered in this case. You will be bound by any judgment entered or settlement reached in the lawsuit, whether favorable or unfavorable, and you will give up your right to sue Facebook as part of any other lawsuit for the claims made in this case.

EXCLUDE YOURSELF FROM THE CLASS: The Court will exclude any person who asks to be excluded. If you exclude yourself from the Class (*i.e.*, opt out), you will not be entitled to money or benefits if they are awarded or recovered. You will not be bound by any orders or judgments of the Court, and you will not give up your right to sue Facebook as part

of any other lawsuit for the claims made in this case. The deadline to exclude yourself is July 28, 2025. Specific instructions on how to request exclusion are included in the Long-Form Notice available to download at www.FacebookPotentialReachLawsuit.com.

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.

Want More Information?

Go to www.FacebookPotentialReachLawsuit.com, call 888-206-2123, or write to Facebook Potential Reach Class Action, c/o A.B. Data, Ltd., P.O. Box 173105, Milwaukee, WI 53217.