

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ALABAMA

If you were under 18 when you appeared in a video or image viewable on Pornhub.com, YouPorn.com, Redtube.com, XTube.com, and Tube8.com, or others listed below, a class action lawsuit may affect your rights.

A federal court authorized this Notice. This is not a solicitation from a lawyer.

A class action lawsuit known as *Doe #1 v. MG Freesites LTD et al.*, Case No. 7:21-cv-00220-LSC is pending in the United States District Court for the Northern District of Alabama against MG Freesites, LTD, d/b/a “Pornhub”; MG Freesites II, LTD; Mindgeek S.A.R.L.; Mindgeek USA Incorporated; MG CY Holdings LTD; Mindgeek Content RT Limited; 9219-1568 Quebec, Inc., d/b/a Mindgeek; and MG Billing LTD (“Defendants”). The lawsuit claims that Defendants knew or should have known that they systematically benefited from the possession and distribution of child sex abuse material (“CSAM”) on its pornography websites **Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com.**

The Court decided that the “class” includes all persons who were under the age of 18 when they appeared in a video or image that has been made available for viewing on **Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com**, from February 12, 2011, through the present.

This means that if you were under the age of 18 and appeared in a photo or video on sites referenced above, your rights are affected by this lawsuit. An expanded list of included websites can be found in Question 9 below.

The Court has not decided who is right or wrong. There is no money available now, and no guarantee there will be. However, if you are a member of the class described above, your legal rights are affected, and you have a choice to make now.

This Notice may affect your rights. Please read it carefully.

Your Rights and Choices		DEADLINE
Do Nothing	Stay in this lawsuit. Await the outcome. Give up certain rights. By doing nothing, you keep the possibility of getting money or benefits that may come from a trial or a settlement. But, you give up any rights to sue Defendants separately about the same legal claims in this lawsuit. You will be bound by the result of this lawsuit.	
Exclude Yourself (Opt Out)	Get out of this lawsuit. Get no benefits. Keep your rights to sue. If you wish to be excluded from this class action, fill out and return the Request for Exclusion From Class (“Opt-Out”) Form. If you ask to be excluded from this lawsuit and money or benefits are later awarded, you will not share in that money or those benefits. But you keep any rights to sue Defendants separately, at your own expense, and with your own attorney about the same legal claims in this lawsuit, subject to applicable defenses that Defendants may have to each legal claim.	December 6, 2024

- Plaintiff must prove their claim against Defendants at a trial, which may be scheduled for as early as July 2024. If you do not ask to be excluded from the lawsuit and money or benefits are obtained from Defendants, you will be notified about how to ask for a share.

Questions? Go to www.VictimImageLawsuit.com or call 1-888-897-1858.

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BASIC INFORMATION

1. What is this Notice about?

This Notice explains that the Court has allowed, or “certified,” a class action lawsuit that may affect you if you were under the age of 18 when you appeared in a video or image that has been made available for viewing on any website owned or operated by Defendants from February 12, 2011, through the present. The websites owned by MindGeek that are at issue are **Pornhub.com, Pornhubpremium.com, Redtube.com, Redtubepremium.com, YouPorn.com, YouPornpremium.com, Tube8.com, Mofosex.com, ExtremeTube.com, Spankwire.com, Keezmovies.com, Thumbzilla.com, and XTube.com.** You have legal rights and options that you may exercise before the Court holds a trial, which may be as early as July 2024. The trial will decide whether the legal claims being made against Defendants, on your behalf, are correct.

Judge L. Scott Coogler of the United States District Court for the Northern District of Alabama is overseeing this class action. The lawsuit is known as *Doe #1 v. MG Freesites LTD et al.*, Case No. 7:21-cv-00220-LSC.

2. What is a class action and who is involved

In a class action lawsuit, a court appoints one or more people or entities to be the “plaintiff” to sue on behalf of other people who have similar legal claims. If the court allows the lawsuit to proceed as a class action, the court appoints the plaintiff as the “class representative.” The people together are a “class” or “class members.” The plaintiff—and all the class members like them—are called the plaintiff. The companies and people they sued are called the defendants. One court resolves the issues for everyone in the class—except for those people who choose to exclude themselves from the class. In this lawsuit, Jane Doe is the Plaintiff and class representative.

3. Why is the lawsuit a class action?

The Court decided this lawsuit can be a class action and move towards a trial.

THE LEGAL CLAIMS IN THE LAWSUIT

4. What is this lawsuit about?

The lawsuit claims that Defendants knew or should have known that they systematically benefited from the possession and distribution of child sex abuse material (“CSAM”) on its pornography websites, in violation of the Trafficking Victims Protection Reauthorization Act (“TVPRA”), 18 U.S.C. §§ 1591 and 1595 (Count I). The lawsuit also alleges Defendants received and distributed child pornography in violation of 18 U.S.C. §§ 2252 and 2252A (Count II).

Defendants are a group of privately held companies that operate many of the most popular pornographic websites, including Pornhub, Redtube, and YouPorn. Their flagship video sharing platform is Pornhub. Created in 2007, Pornhub is a leading free, ad-supported, adult content hosting and streaming website.

Questions? Go to www.VictimImageLawsuit.com or call 1-888-897-1858.

5. Has the Court decided who is right?

The Court has not decided whether Plaintiff or Defendants are right. By establishing the class and providing this Notice, the Court has not decided and is not suggesting that Plaintiff will win or lose this case. The parties have a chance to prove or disprove their legal claims and/or defenses. Plaintiff must prove their legal claims at the trial which may be scheduled as early as July 2024. (See “The Trial” below).

6. What is Plaintiff asking for?

Plaintiff is asking for money for the class members for Defendants’ alleged wrongdoings. Plaintiff is also asking for injunctive or equitable relief (a legal term that means Plaintiff is asking Defendants to stop doing the alleged wrongdoings) as decided by the Court, and attorneys’ fees and costs for Class Counsel.

7. Is there any money or benefits available now?

No money or benefits are available now. The Court has not decided whether Defendants did anything wrong, and Plaintiff and Defendants have not settled the lawsuit. There is no guarantee money or benefits will be obtained in the future. You will be notified if money or benefits become available.

WHO IS IN THE CLASS

8. Am I part of the class?

You are a class member if you meet the following definition defined by the Court.

Class: All persons who were under the age of 18 when they appeared in a video or image that has been made available for viewing on any website owned or operated by Defendants any time from February 12, 2011, through the present.

9. What websites did the Defendants own or operate?

The websites that Defendant owned or operated include the following:

- Pornhub.com
- Premium.com
- Redtube.com
- Redtubepremium.com
- YouPorn.com
- YouPornpremium.com
- Tube8.com
- Mofosex.com
- ExtremeTube.com
- Spankwire.com
- Keezmovies.com
- Thumbzilla.com
- Xtube.com

10. What if I am still not sure if I am included?

If you are still not sure whether you are included in the class, you can get free help at www.VictimImageLawsuit.com, or by calling or writing to the lawyers in this case, at the phone number or address listed in Question 14.

Questions? Go to www.VictimImageLawsuit.com or call 1-888-897-1858.

YOUR RIGHTS AND OPTIONS

You must decide whether to stay in the class or ask to be excluded (and keep your right to sue Defendants in your own separate lawsuit).

11. What happens if I do nothing at all?

You do not have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit in the future. By doing nothing you are staying in the class and if Plaintiff obtains money or benefits in the future, you will be notified about how to get your share. If you do nothing now, you will not be able to sue, or continue to sue Defendants—as part of any other lawsuit—about the same legal claims in this lawsuit. You will also be legally bound by the orders and judgments.

12. Why would I ask to be excluded?

If you want to sue Defendants on your own regarding the same legal claims in this lawsuit, or already have your own lawsuit against Defendants regarding the same legal claims in this lawsuit and you want to continue with it, you need to ask to be excluded from the class. If you exclude or remove yourself from the class—sometimes called “opting-out” of the class—you will not get any money or benefits from this lawsuit even if Plaintiff wins at trial or there is a settlement. However, you may be able to sue or continue to sue Defendants on your own. If you exclude yourself, you will not be legally bound by the Court’s judgments in this class action lawsuit.

If you start your own lawsuit or continue with an existing lawsuit against Defendants regarding the same legal claims in this lawsuit after you exclude yourself, you will have to hire your own lawyer(s) for that lawsuit, and you will have to prove your legal claims. If you do exclude yourself so you can start or continue your own lawsuit against Defendants, you should talk to your own lawyer soon, because *your claims may be subject to a statute of limitations*, meaning that you may face a deadline after which you cannot sue.

13. How do I ask the Court to exclude me from the class?

To ask to be excluded from the class, you must submit the Request for Exclusion From Class (“Opt-Out”) Form available at www.VictimImageLawsuit.com or email your Form to info@victimimagelawsuit.com or mail your Form, **postmarked by December 6, 2024**, to:

MindGeek Class Action Administration
Exclusion Requests
P.O. Box 3715, Portland, OR 97208-3715

IF YOU DO NOT EXCLUDE YOURSELF BY DECEMBER 6, 2024, YOU WILL REMAIN PART OF THE CLASS AND BE BOUND BY THE ORDERS OF THE COURT IN THIS LAWSUIT.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in this case?

Yes. The Court appointed the below law firms as “Class Counsel.” They are experienced in handling similar class action cases. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

Questions? Go to www.VictimImageLawsuit.com or call 1-888-897-1858.

<p>Gregory Zarzaur (ASB-0759-E45Z) THE ZARZAUR LAW FIRM 2332 Second Avenue North Birmingham, Alabama 35203 T: (205) 983-7985 E: gregory@zarzaur.com</p>	<p>Kimberly Lambert Adams LEVIN PAPANTONIO RAFFERTY 316 S. Bavlen Street, Suite 600 Pensacola, FL 32502 T: (850) 435-7056 E: jointhefight@levinlaw.com</p>	<p>Joshua Hayes PRINCE GLOVER HAYES 701 Rice Mine Road, N. Tuscauloosa, AL 35406 T: (205) 345-1234 E: josh@princelaw.net</p>
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15. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you can hire your own lawyer at your own expense. For example, you can ask them to appear in Court for you if you want someone other than Class Counsel to speak for you.

16. How will the lawyers be paid?

If Class Counsel gets money or benefits for the class, they may ask the Court for an award of attorneys’ fees and expenses. You will not have to personally pay these attorneys’ fees and expenses. If the Court grants Class Counsels’ request, the attorneys’ fees and expenses will either be deducted from any money obtained for the class or paid separately by Defendants.

THE TRIAL

17. How and when will the Court decide who is right?

Class Counsel will have to prove Plaintiff’s claims at a trial. The trial has not been scheduled. During the trial, a Jury and the Judge will hear all of the evidence to help them reach a decision about whether Plaintiff or Defendants are right about the legal claims in the lawsuit. There is no guarantee that Plaintiff will win, or that they will get any money for the class.

18. Do I have to attend the trial?

No. You do not need to attend the trial. Class Counsel will present the case for Plaintiff and the class, and lawyers for the Defendants will present on their behalf. You or your own lawyer may attend at your own expense.

19. Will I get money after the trial?

If Plaintiff obtains money or benefits as a result of the lawsuit, and you remain in the class, you will be notified about how to participate. It is unknown how long this will take.

GETTING MORE INFORMATION

20. How do I get more information?

This Notice contains a summary of the lawsuit and the proceedings. You can get additional information by visiting www.VictimImageLawsuit.com, calling 1-888-897-1858, emailing info@victimimagelawsuit.com, or writing the Administrator at:

Questions? Go to www.VictimImageLawsuit.com or call 1-888-897-1858.

MindGeek Class Action Administration
P.O. Box 3715
Portland, OR 97208-3715

You can also call Class Counsel at 1-866-389-3473 or email them at imagelawsuitinfo@levinlaw.com.

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE.

Questions? Go to www.VictimImageLawsuit.com or call 1-888-897-1858.