

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROBLOX CORPORATION CHILD
SEXUAL EXPLOITATION AND
ASSAULT LITIGATION

MDL No. 3166

Case No. 3:25-md-03166-RS

This document relates to:

ALL ACTIONS

**STIPULATED ~~PROPOSED~~ CASE
MANAGEMENT ORDER – DIRECT
FILING ORDER**

Judge Richard Seeborg

I. SCOPE OF ORDER

This Order shall govern all actions in the above-captioned MDL proceeding (the “MDL”) that are directly filed in this District as a constituent case of the MDL after the date of this Order.

II. DIRECT FILING OF ACTIONS INTO THE MDL

A. Direct Filing:

To eliminate potential delays associated with transfer to this Court of actions filed in or removed to other federal district courts, and to promote judicial efficiency, any Plaintiff whose case would be subject to transfer to MDL No. 3166 as a “tag-along” case may, subject to the provisions set forth below, file their action in this District as a constituent case of the MDL rather than in the federal district court in which the Plaintiff would have filed their case in the absence of this direct filing order. Defendants reserve the right to object to the inclusion of any such action in this MDL,

1 including on the grounds that it is not properly within the scope of this MDL.

2 **B. Single Plaintiff Only:**

3 Cases directly filed in this Court pursuant to this Order shall not name more than a single
4 Plaintiff in the case, provided, however, that any such case may include consortium plaintiff(s) as
5 permitted by law; a parent or guardian of a minor Plaintiff as permitted by law; and, in the event of
6 a wrongful death action, the appropriate representative(s) of the Estate. Nothing in this clause shall
7 be construed to waive or modify Rule 21 of the Federal Rules of Civil Procedure.

8 **C. Pretrial Proceedings Only; No *Lexecon* Waiver:**

9 Each action filed in this District will become a constituent case in the MDL for pretrial
10 proceedings only, consistent with the JPML's December 12, 2025, Transfer Order (ECF No. 1).
11 The coordination of constituent cases in MDL proceedings, including agreement by the Plaintiffs
12 and Defendants to this direct filing order, does not constitute a waiver of any party's rights under
13 *Lexecon, Inc. v. Milberg Weiss Bershad Hynes & Lerach*, 523 U.S. 26 (1998) ("*Lexecon*").
14 However, nothing in this Order shall preclude the parties from agreeing to such waivers in the
15 future. And, nothing in this Order shall make a venue that is otherwise proper under 28 U.S.C.
16 § 1391 improper. Further, for the avoidance of doubt, any case directly filed into the MDL shall be
17 subject to the provisions of all prior or subsequent orders of the Court.

18 **D. Designated Forum:**

19 Any plaintiff who directly filed a complaint in MDL No. 3166 shall designate the federal
20 district court in which the complaint should be deemed to have been originally filed (i.e., the
21 Northern District of California or the district to which the plaintiff wishes to have their complaint
22 transferred ultimately, as provided by this Order). Plaintiffs shall allege in their complaints facts to
23 support personal jurisdiction or venue in the designated district. Such designation shall not,
24 standing alone, constitute a determination by this Court that jurisdiction or venue is proper in the
25 designated forum. Defendants' response to that complaint does not constitute a waiver of personal
26 jurisdiction in the designated court. At the completion of all pretrial proceedings applicable to such
27 cases, and subject to any agreement that may be reached concerning a waiver of the requirements
28 for transfer pursuant to *Lexecon*, this Court shall transfer such cases to the federal district court

identified by Plaintiff in the operative complaint (unless the Northern District of California is specified as Plaintiff's preferred forum). The Parties reserve all rights with respect to the proper venue for remand and any post-remand jurisdictional, venue, or forum challenges or motions, including pursuant to 28 U.S.C. § 1404(a) or under forum-selection provisions in Defendants' respective applicable terms of service, and including any objections to venue if the venue where the plaintiff indicates they would have filed the case is itself not a proper venue under 28 U.S.C. § 1391.

E. Choice of Law:

Filing an action as a constituent case of the MDL pursuant to this Order, standing alone, will not determine the applicable choice of law, including the choice of law for any of the claims in the action and for statute of limitations purposes. The Parties' agreement to this Order (or the fact of a direct filing pursuant to this Order) shall not constitute a waiver of, or agreement to, the application of any choice of law principles or substantive law to a particular Plaintiff's action. Choice of law issues are reserved and may be briefed, as appropriate, at a later date.

F. Filing:

All complaints must be filed electronically. Notwithstanding N.D. Cal. Civ. L.R. 3.2, a Plaintiff filing a complaint in this proceeding shall file a Civil Cover Sheet which can be found here: <https://www.cand.uscourts.gov/forms/civil-forms/>. When filing a complaint in this District pursuant to this Order, Plaintiff's counsel must select "Multidistrict Litigation – Direct File" in Section V and identify the MDL case name and number in Section VIII of the Civil Cover Sheet to ensure the case is included as a constituent case of the MDL. Before any Plaintiff's attorney files a complaint in this District pursuant to this Order, that attorney must become a Northern District of California ECF User and must be assigned a Northern District of California ECF user ID and password in accordance with Pretrial Order No. 1 (ECF No. 2). All forms and instructions may be found on the Court's website at www.cand.uscourts.gov/cm-ecf.

G. Service of Process and Waiver:

For Complaints that are properly filed in, removed to, or transferred to this MDL, the Defendants listed below agree to waive formal service of summons pursuant to Rule 4 of the

1 Federal Rules of Civil Procedure. Acceptance of service pursuant to this provision shall not
 2 constitute an appearance or waiver of any defense, including but not limited to personal jurisdiction,
 3 venue, arbitration, or forum-selection defenses. Service upon the following entities will be deemed
 4 complete upon providing copies of the Complaint, Summons, and Civil Cover Sheet to the
 5 following email addresses:

6 **Roblox Corporation**

7 MDL3166ServiceRoblox@cooley.com

8 **Discord Inc.**

9 MDL3166-Service-Discord@dwt.com

10 **Snap Inc.**

11 MDL3166-Service-Snap@omm.com

12 **Meta Platforms, Inc.**

13 MDL3166-Service-Meta@cov.com

14 **Defense Liaison Counsel**

15 mbernstein@cooley.com

16 Defendants' email systems will generate an automated response to the sender upon receipt
 17 of an email to each of the designated addresses. The automated response will confirm receipt of the
 18 email to that email address and shall constitute proof of service upon the Defendants who have
 19 agreed to service at that email address per this Order. Defendants need not otherwise respond to
 20 emails sent to the above email addresses. If an automated response is not generated, Plaintiff's
 21 counsel may contact Defense Liaison Counsel for assistance at mbernstein@cooley.com and copy
 22 Plaintiffs' Liaison counsel at RobloxMDLPlaintiffsLiaison@girardsharp.com. However, it is each
 23 Defendant's responsibility to maintain the above service addresses. If a Defendant elects to modify
 24 a service address applicable to it, or permits a service address to become inoperative, that Defendant
 25 must promptly seek a modification of this Order. Defendants may not object to service using the
 26 above service addresses so long as those addresses remain part of this Order.

27 Plaintiffs shall make proof of electronic service to the Court as required by Rule 4(l)(1) of
 28 the Federal Rules of Civil Procedure. For all Complaints filed in, removed to, or transferred to this

MDL: (i) all requests for issuance of summons shall be made in the underlying constituent case, and not through the MDL case; (ii) all proofs of service shall be filed only in the underlying constituent case and not in the MDL case. Acceptance of electronic service shall not constitute a waiver of any defense.

Plaintiffs shall also serve a copy of each file stamped complaint containing assigned individual case number on Plaintiffs' Liaison Counsel at the following address: RobloxMDLPlaintiffsLiaison@girardsharp.com.

H. Attorney Admission:

Immediately after filing a complaint in this District pursuant to this Order, counsel for Plaintiffs who are not admitted to practice in the Northern District of California must file an application to be admitted pro hac vice in accordance with Northern District of California Civil Local Rule 11-3. The pro hac vice application shall be filed only in the underlying member case, and not in the main MDL Docket. Any attorney whose pro hac vice application is granted in a member case has permission to appear in MDL proceedings and file in the main MDL Docket. Once a counsel is admitted pro hac vice for any case in this litigation, that admission will suffice for any future cases filed in this MDL. Defendants' counsel who have been admitted pro hac vice in this MDL shall be deemed admitted pro hac vice in any case directly filed in this Court pursuant to this Order.

I. Filing Fees:

Internet credit card payments shall be required for all electronically filed complaints, and made online through <https://www.pay.gov>. Plaintiff's counsel will be prompted to pay the required filing fee. Information regarding filing fees may be found at <https://www.cand.uscourts.gov/ecf/payments>.

J. Response to Directly Filed Complaints:

Defendants need not move, plead, or otherwise respond to any Complaint filed in this District as a member case of the MDL until so ordered by the Court.

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2 **IT IS SO ORDERED.**

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4 Dated: February 10, 2026

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RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE

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