

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROBLOX CORPORATION
CHILD SEXUAL EXPLOITATION
AND ASSAULT LITIGATION

Case No. 25-md-03166-RS

**NOTICE OF INTENT TO APPOINT
SETTLEMENT MASTER**

This document relates to:

ALL ACTIONS

As litigation proceeds in this matter, the parties should explore whether resolution is possible in an expeditious, efficient, and just manner. To that end, the appointment of a Settlement Master to facilitate settlement discussions would serve the interests of justice and of the parties. Lead Counsel for Plaintiffs and Defendants have conferred with each other regarding the possibility of appointing Thomas J. Perrelli as Settlement Master, and they have conferred with Mr. Perrelli and considered his qualifications. It is the Court's intention to appoint Mr. Perrelli as Settlement Master.¹

Mr. Perrelli served as Associate Attorney General at the U.S. Department of Justice from 2009 to 2012, overseeing multiple Divisions of the Department and leading major settlement

¹ Mr. Perrelli will be appointed to perform any adjudicatory functions, or to advise the Court on such matters. Accordingly, he is not being appointed pursuant to Federal Rule of Civil Procedure 53. Attached to this Order is a letter from Mr. Perrelli agreeing to serve as Settlement Master and explaining his law firm's engagements involving parties to this litigation. None of these engagements make Mr. Perrelli's appointment to facilitate settlement discussions in these matters inappropriate.

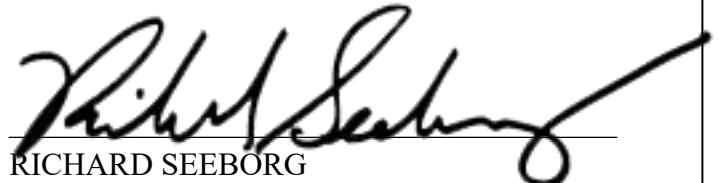
1 negotiations on behalf of the United States. He is currently the Chair of Jenner & Block LLP and a
2 partner in the firm's Washington, D.C. office, where he leads the firm's Government
3 Controversies and Public Policy Litigation Practice. Mr. Perrelli has previously served as court-
4 appointed Settlement Master in the JUUL MDL in this district, and currently serves as the court-
5 appointed Settlement Master in the Camp Lejeune water contamination cases in the District Court
6 for the Eastern District of North Carolina.

7 Based on these experiences and the experience of this district, Mr. Perrelli is highly
8 qualified to earn the parties' trust and to facilitate discussions effectively that may lead to fair and
9 efficient resolution of some or all of these matters. Mr. Perrelli will not adjudicate, or assist the
10 Court with adjudicating, any issues in these proceedings. His role will be to use his experience and
11 judgment solely to mediate settlement discussions among the various parties.

12 The parties may respond to this suggestion of the appointment of Mr. Perrelli. Any
13 responses shall be filed on or before noon on April 22, 2026, and shall not exceed two pages.

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16 **IT IS SO ORDERED.**

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18 Dated: April 16, 2026

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21 RICHARD SEEBORG
22 Chief United States District Judge
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1099 NEW YORK AVENUE, NW SUITE 900 WASHINGTON, DC 20001-4412

JENNER & BLOCK LLP

April 14, 2026

Thomas Perrelli
Tel +1 202 639 6004
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VIA EMAIL

Judge Richard Seeborg
United States District Court: N. District of California
450 Golden Gate Avenue, Box 36060
San Francisco, CA 94102-3489
Email: Richard_Seeborg@cand.uscourts.gov

Re: Roblox MDL

Dear Judge Seeborg:

This letter confirms my willingness to serve as Settlement Master in the above-captioned litigation (“the Litigation”). As you know, I am currently a partner and Firm Chair of Jenner & Block LLP. I have previously served in the U.S. Department of Justice in a variety of capacities, most recently as Associate Attorney General.

My law firm has reviewed its files and identified certain representations involving entities that are either parties to this Litigation or, to the best of my knowledge, financial affiliates of parties to the Litigation.

- Jenner & Block does not represent Roblox, Discord, or Snap.
- To the extent identities of individual plaintiffs are known, Jenner & Block does not represent any of the plaintiffs.
- Jenner & Block represents Meta Platforms in certain matters unrelated to the Roblox MDL. While I have done work for Meta in the past, I am not currently representing them in any capacity.
- Cooley LLP, which is counsel to Roblox, represents Jenner & Block in *Jenner & Block LLP v. United States Department of Justice*, Civ. Act. No. 1:2025cv00916 (D.D.C), litigation arising out of an Executive Order issued against Jenner & Block.

Should I be selected, personnel involved in matters for these clients, or potential future matters involving parties to the Roblox MDL, would be walled off from my work as Settlement Master. To the extent that any party to this litigation requests that I represent them in unrelated matters, I will consult with the parties and the Court before undertaking any such representation.

April 14, 2026
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Sincerely,

A handwritten signature in blue ink that reads "Thomas J. Perrelli". The signature is written in a cursive style with a large, stylized "T" and "P".

Thomas Perrelli