



Alexandra M. Walsh
ANAPOL WEISS
 14 Ridge Square, NW, 3rd Floor
 Washington, DC 20016
 Telephone: (771) 224-8065
 Facsimile: (215) 735-2211
 awalsh@anapolweiss.com

Sarah London
GIRARD SHARP LLP
 601 California St #1400
 San Francisco, CA 94108
 Telephone: (866) 981-4800
 Fax: (415) 981-4800
 slondon@girardsharp.com

Bryan Aylstock
**AYLSTOCK, WITKIN, KREIS
 & OVERHOLTZ, PLLC**
 17 East Main Street, Suite 200
 Pensacola, Florida 32502
 Telephone: (850) 202-1010
 Fax: (850) 916-7449
 baylstock@awkolaw.com

Lead Counsel for Plaintiffs

*Additional parties and counsel listed on
 signature pages*

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

**STIPULATION AND [PROPOSED]
 ORDER RE: ARBITRATION
 BELLWETHER AMENDED
 COMPLAINTS**

Judge Richard Seeborg

1 Pursuant to Civil Local Rule 7-12, Plaintiffs and Defendants Roblox Corporation and
2 Discord Inc., by and through their counsel of record or, in the case of Plaintiffs, through their court-
3 appointed leadership counsel, stipulate as follows:

4 WHEREAS, Plaintiffs and Defendants Roblox Corporation and Discord Inc. selected eight
5 bellwether cases for the briefing of motions to compel arbitration on June 30, 2026, ECF 317, 346;

6 WHEREAS, Plaintiffs may file amended complaints for the selected cases by July 28, 2026,
7 ECF 346;

8 WHEREAS, it makes sense for overlapping allegations concerning Defendants' platforms
9 and conduct to appear in one pleading rather than repeated in any of the eight amended complaints
10 concerning those defendants;

11 Accordingly, the parties stipulate as follows:

- 12 1. The bellwether Plaintiffs will file one pleading (the "Common Pleading") containing
13 common allegations as to each of the defendants named in any of the selected cases.
- 14 2. Each bellwether plaintiff who elects to amend may file an individual amended complaint
15 identifying the defendants against which the plaintiff asserts claims, incorporating by
16 reference the allegations concerning those defendants in the Common Pleading,
17 pleading additional or case-specific facts in support of the plaintiff's claims, and
18 specifying and pleading the causes of action asserted.
- 19 3. The Common Pleading is not a "master complaint" and does not apply, unless later
20 stipulated otherwise, to any complaint or plaintiff other than the arbitration bellwethers
21 that expressly invoke it.
- 22 4. The Common Pleading is an administrative device to simplify the pleading and
23 responses to the bellwether arbitration complaints.
- 24 5. The Common Pleading, along with any additional or case-specific facts each Plaintiff
25 alleges, will together serve as the operative complaint for each of the eight bellwether
26 Plaintiffs for all purposes (unless and until properly amended under the Federal Rules
27 of Civil Procedure or by order of this Court).
- 28

IT IS SO STIPULATED.

Respectfully submitted,

Co-Lead Counsel for Plaintiffs

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Cooley LLP

/s/ Tiana Demas
Tiana Demas (*pro hac vice*)

Attorneys for Defendant
ROBLOX CORPORATION

Davis Wright Tremain LLP

/s/ Ambika Kumar
Ambika Kumar (*pro hac vice*)

Attorneys for Defendant
DISCORD INC.

Attestation

I attest, pursuant to N.D. Cal. Civil L.R. 5-1, that concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: July 15, 2026

/s/ Andrew R. Kaufman

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

~~[PROPOSED]~~ ORDER RE:
**ARBITRATION BELLWETHER
AMENDED COMPLAINTS**

Judge Richard Seeborg

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July 15, 2026


HON. RICHARD SEEBORG
United States District Judge