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Attorneys for Defendant
ROBLOX CORPORATION

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

**PLAINTIFFS AND DEFENDANTS ROBLOX
CORPORATION AND DISCORD INC.'S JOINT
STIPULATION; ~~[PROPOSED]~~ ORDER
REGARDING PILOT MOTIONS TO COMPEL
SELECTION PROCESS**

Judge Richard Seeborg

Pursuant to Civil Local Rule 7-12, all Plaintiffs in this multi-district litigation (“MDL”) and Defendants Roblox Corporation (“Roblox”) and Discord Inc. (“Discord”) (collectively, “Defendants”) (Plaintiffs and Discord, collectively the “Parties”), by and through their counsel or, in the case of Plaintiffs, through their court-appointed leadership counsel, stipulate as follows:

WHEREAS, Defendants anticipate filing motions to compel arbitration in the individual cases in this MDL and the Parties and Court have agreed that selecting initial “Pilot Cases” to resolve first will streamline motion practice on this issue;

WHEREAS, the Court set a deadline of April 24, 2026, for Plaintiffs and Defendants to submit a joint proposal, or competing proposals, regarding the selection of Pilot Cases for this purpose (*see* ECF 269);¹

WHEREAS, the Parties have met and conferred and have agreed to a joint proposal, as set forth below;

WHEREAS, the Parties anticipate selecting Pilot Cases to enable the Court to address, among other issues, two main issues: first, whether an agreement to arbitration was formed; and second, whether the Ending Forced Arbitration Act (“EFAA”), 9 U.S.C. § 402, applies to any such agreement;

THEREFORE, the Parties agree that:

- Defendants Roblox and Discord will, together, pick two Pilot Cases to be briefed by both Defendants;
- Defendants Roblox and Discord will each pick one additional Pilot case that each will brief separately;²

¹ The Parties select these Pilot Cases solely for the purpose of resolving initial motions to compel arbitration and for no other purpose.

² If Roblox and Discord pick the same third case to brief, no fourth case will be selected.

- Plaintiffs will pick four Pilot Cases, and identify one case Roblox need not brief and one case that Discord need not brief, so that each Defendant will brief a total of six Pilot Cases;
- As a result, the Parties will select up to eight total Pilot Cases and each Defendant will brief up to six of these Pilot Cases;³
- To improve the chances that the collection of Pilot Cases will provide guidance to the Parties on a broad set of other cases in this MDL, Defendants will have three court days from the Amendment Deadline to substitute one selection each;
- If a Defendant elects to substitute a Pilot Case, Plaintiffs will have two weeks to amend that Pilot Case; and
- Should events render the Pilot Cases non-representative or otherwise undermine the purpose of the Pilot Cases selection process (for example, the voluntary dismissal of a Pilot Case), the Parties agree to meet and confer to attempt to resolve the issue, and to promptly raise any dispute with the Court, with the goal of preserving the current case schedule, wherever possible.
- The Parties will confer over any adjustments to the schedule (*see* ECF 269) necessary to accommodate amendments to Pilot Cases.

IT IS SO STIPULATED.

³ Defendants reserve the right, and intend, to move to compel in all cases they do not brief as part of this process. Defendants also do not waive any argument as to the potential preclusive effect of any decision on any Pilot Case on the remaining MDL cases.

1 Dated: April 24, 2026

Respectfully submitted,

2 **COOLEY LLP**

3 /s/ Tiana Demas

4 Tiana Demas (*pro hac vice*)

5 Attorneys for Defendant
ROBLOX CORPORATION

6 **DAVIS WRIGHT TREMAINE LLP**

7 /s/ Ambika Kumar

8 Ambika Kumar (*pro hac vice*)

9 Attorneys for Defendant
10 DISCORD INC.

**AYLSTOCK, WITKIN, KREIS & OVERHOLTZ
PLC**

/s/ Bryan Aylstock

Bryan Aylstock

Co-Lead Counsel for Plaintiffs

GIRARD SHARP LLP

/s/ Sarah London

Sarah London

Co-Lead Counsel for Plaintiffs

ANAPOL WEISS

/s/ Alexandra Walsh

Alexandra Walsh

Co-Lead Counsel for Plaintiffs

ATTESTATION

I, Tiana Demas, hereby 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: April 24, 2026

/s/ Tiana Demas

Tiana Demas (*pro hac vice*)

Attorneys for Defendant
ROBLOX CORPORATION

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 27, 2026



HONORABLE RICHARD SEEBORG
Chief United States District Judge