## NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

## United States District Court for the Northern District of California

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

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Are you a U.S. advertiser who purchased advertisements from LinkedIn Corporation between January 1, 2015, and May 31, 2023? If so, you could get a payment from a \$6.625 million class action settlement.

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What is the lawsuit about? The lawsuit alleges that LinkedIn misrepresented how it calculates fees incurred by online advertisers who purchased advertisements through LinkedIn Marketing Solutions ("LMS") and failed to adequately review the accuracy of its LMS advertising metrics, including forecasted metrics advertisers received in advance of ad purchases and performance metrics advertisers received after launching ad campaigns. The lawsuit further alleges that LinkedIn's failure to adequately review its LMS advertising metrics caused LinkedIn to overcharge advertisers due to interactions with fraudulent and automated accounts, user-generated mistaken clicks, and technological errors. LinkedIn acknowledges that a small number of fraudulent and automated accounts may interact with LMS advertisements, that users may mistakenly click on advertisements, and that LinkedIn has had technological errors that have led to increased charges for some advertisers. But LinkedIn contends that it has thorough systems in place to minimize the impact of these issues that are in-line with and often exceed industry standards. LinkedIn denies that these issues resulted in LinkedIn charging advertisers improperly or that it breached its agreements with advertisers.

What are the settlement benefits? LinkedIn has agreed to pay \$6.625 million to resolve the lawsuit, from which at least \$4,572,603.06 is anticipated to be paid to class members. The class is made up of U.S. advertisers who purchased advertising through LMS. Each class member's share will be based on the amount spent on LMS advertisements during the class period, which runs from January 1, 2015, to May 31, 2023. No action is needed to claim your money. It will be sent to you automatically unless you exclude yourself. Payments will be proportionate to the amount paid to advertise on LinkedIn during the calss period. If your pro rata share of the settlement fund would entitle you to a payment of \$5 or more and LinkedIn has your address on file, your default payment method will be check. If your payment would be less than \$5, and you have advertised on LinkedIn on or after February 27, 2023, and LinkedIn has active billing information for you, your default payment method will be in the form of advertising credit. Everyone else will default to receive their payment in the form of a digital payment card. Class members can contact the Settlement Administrator to change their payment method, but members receiving a payment of \$1 or less cannot receive payment by check.

What are my other options? If you want to pursue your own lawsuit against LinkedIn related to the allegations in this lawsuit and do not wish to be bound by the terms of the proposed class action settlement, you must exclude yourself to preserve your rights. If you're a class member, you can ask the Court to deny approval by filing an objection, however the Court cannot change the terms of the settlement. *The deadline to exclude yourself from or object to the settlement is November* 5, 2024. To exclude yourself from the settlement or object to it, you can find more information and the applicable procedures at www.LinkedInAdvertisingClassAction.com.

<u>Do I have a lawyer?</u> Yes, the Court has appointed lawyers from the firms of Keller Postman LLC and Romanucci & Blandin, LLC. They represent you and the other Settlement Class Members. The lawyers will request to be paid from the total amount that LinkedIn agreed to pay to the class members. You can hire your own lawyer, but you'll need to pay that lawyer's legal fees if you do. The Court has also chosen TopDevz, LLC and Noirefy, Inc.—class members like you—to represent the Settlement Class.

<u>Fairness Hearing</u>: The Court will hold a hearing at 10:00 a.m. PT on January 14, 2025, to consider whether to approve the settlement and a request by the attorneys representing all class members for up to \$1,656,250.00 for attorneys' fees, \$154,874.94 in cost reimbursements, and service awards of up to \$25,000 each for the class representatives for investigating the facts, litigating the case, and negotiating the settlement. You may ask to appear at the hearing, but you don't have to. If you plan on attending the fairness hearing, please check the settlement website, www.LinkedInAdvertisingClassAction.com, beforehand, as the date, time, or manner of the hearing is subject to change by Court order.

How do I get more information? This notice summarizes the proposed class action settlement. For the precise terms and conditions of the settlement, please see the Long-Form Notice and Settlement Agreement, both of which are available at <a href="www.LinkedInAdvertisingClassAction.com">www.LinkedInAdvertisingClassAction.com</a>, by contacting Class Counsel at (312) 948-8472, by accessing the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <a href="https://ecf.cand.uscourts.gov">https://ecf.cand.uscourts.gov</a>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, San Jose Division, 280 South 1st Street, Room 2112, San Jose, California 95113, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

QUESTIONS? VISIT <u>WWW. LINKEDINADVERTISINGCLASSACTION.COM</u> OR CALL877-411-4976.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT