

Long-Form Notice

DID YOU HAVE A FACEBOOK ACCOUNT AT ANY TIME BETWEEN 2007 AND 2018?

THIS NOTICE AFFECTS YOUR LEGAL RIGHTS

A class action has been certified by the B.C. Supreme Court in *Moretti et al. v. Facebook, Inc.*, S.C.B.C. No. VLC S-1813727 against Sony Group Corporation and Huawei Technologies Co Ltd for settlement purposes only on January 19, 2022.

The class action has been certified against Sony Group Corporation and Huawei Technologies Co Ltd only on behalf of all Facebook users in Canada between January 1, 2007 and December 31, 2018. The lawsuit is continuing against Facebook and the other remaining Defendants. Since the lawsuit was filed, Sony Corporation changed its name to Sony Group Corporation. All references in this notice are to Sony Group Corporation.

What is the class action about?

The lawsuit alleges that Facebook secretly gave major device manufacturers access to users' personal information, without users' knowledge or consent and in breach of their privacy. The Court has appointed Concetta Moretti, Christopher Chow, Elizabeth Judie Chartrand and Jill Dockrill as representative plaintiffs.

Through this settlement, neither Huawei Technologies Co Ltd, nor Sony Group Corporation, nor any of their affiliates are admitting liability. Facebook and the other Defendants deny the allegations, which have not been proven, and are defending the lawsuit.

How do I participate?

You are automatically included in the class. You do not have to do anything to participate. If you do **not** want to be part of the lawsuit, you must notify class counsel in writing at the address below by not later than **June 1, 2022**, providing your name and address and indicating that you wish to opt out using the opt-out form.

If you wish to object to the settlement, you must do so by **May 23, 2022** in writing at the address below with the following information: (i) caption or title identifying it as an objection; (ii) contact information including class member's name, address, email and telephone number, and the same information for any lawyer for the class member; (iii) clear and concise statement of the objection and the legal grounds; (iv) sufficient evidence to establish standing as a class member. If you wish to appear, you must deliver to class counsel in writing a notice of intention to appear at least 10 days prior to the hearing, including name, address, telephone number for the class member and any lawyer who will appear on their behalf.

What are the financial consequences?

The settlement with Huawei is a cooperation settlement. No funds will be distributed to class members from this settlement.

The settlement agreement with Sony Group Corporation provides for the payment of \$100,000 CAD and cooperation with the Class in exchange for an end to the claims against it and any of its affiliates. Neither Sony Group Corporation, nor its affiliates admit any liability through the settlement.

The settlement funds will be used to fund the ongoing litigation against the remaining Defendants and to pay for disbursements incurred by class counsel, upon court approval. No funds will be distributed to class members at this time.

Where can I find more information?

Settlement documents, opt-out forms, and court documents are available on <https://www.callkleinlawyers.com/class-actions/facebook-device-manufacturers-class-action/>.

For more information, please contact class counsel: Mathew P. Good Law Corporation and Klein Lawyers LLP at dtanjuatco@callkleinlawyers.com and 604-874-7171.

This notice has been authorized by the B.C. Supreme Court.