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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ZARA LEVENTHAL, individually and on behalf of all others similarly situated, Plaintiff, vs. STREAMLABS, LLC, Defendant.	Case Number: 3:22-cv-01330-LB **JOINT STIPULATION AND [PROPOSED] ORDER AMENDING FINAL JUDGMENT REGARDING *CY PRES* RECIPIENT FOR SETTLEMENT FUND REMAINDER**

WHEREAS, a class action captioned *Zara Leventhal, individually and on behalf of all others similarly situated, v. Streamlabs, LLC*, Case No. 3:22-cv-01330-LB is before this Court (the "Action");

WHEREAS, on January 30, 2025, this Court entered a Final Judgment and Order Approving Class Action Settlement (ECF #102) ("Final Judgment"), and retained continuing jurisdiction over, *inter alia,* the purpose of administering the Settlement;

WHEREAS, the Notices distributed to the members of the Class informed them that remaining settlement funds following distribution of the class action settlement to claimants that filed valid claim forms would be distributed to a §501(c)(3) charitable organization (but did not identify a specific name of such organization);

WHEREAS, the Final Judgment named the §501(c)(3) charitable organization which was to serve as the *cy pres* recipient, The AbleGamers Foundation Inc. ("AbleGamers");

WHEREAS, in light of recent media coverage of AbleGamers, (*see* https://www.ign.com/articles/former-employees-community-members-allege-ablegamers-founder-fostered-abuse-behind-closed-doors), to avoid any appearance of impropriety, the parties believe the *cy pres* recipient should be changed;

WHEREAS, as a result, the Parties stipulate to and request that the Court amend its Final Judgment to remove AbleGamers as the *cy pres* recipient and substitute in its place the following §501(c)(3) charitable organizations, with any remainder funds to be divided among them:

Child's Play Charity, https://childsplaycharity.org/, a charity that delivers therapeutic games and technology to pediatric hospitals to improve patients' lives;[1]

Code.org, https://code.org/, a nonprofit which provides that schools offer computer science as part of their core K-12 education; it is reputed to be the leading provider of K-12 computer science curriculum in the largest school districts in the United States;[2]

[1] Child's Play has a 91% rating from Charity Navigator, https://www.charitynavigator.org/ein/203584556.

[2] Code.org has a 100% rating from Charity Navigator, https://www.charitynavigator.org/ein/460858543.

Electronic Frontier Foundation, https://www.eff.org/, a nonprofit that defends civil liberties and digital rights and freedoms in the digital world, working to protect user privacy and technological development;[3]

Gamers Outreach Foundation, https://gamersoutreach.org, a nonprofit that uses video games to provide entertainment and support to hospitalized children with the aim to help children cope with treatment and feel more at home in the hospital environment;[4] and

Girls Who Code Inc., www.girlswhocode.com, a charitable organization which, *inter alia*, helps educate, train, and equip girls to pursue tech opportunities, training volunteers and teachers for tech programs, promoting equal opportunity and helping students in underrepresented groups pursuing STEM.[5]

NOW, THEREFORE,

The Parties stipulate that good cause exists to amend the Final Judgment to remove AbleGamers as the *cy pres* recipient and to substitute Child's Play Charity, Code.org, Electronic Frontier Foundation, Gamers Outreach Foundation, and Girls Who Code, Inc. as the *cy pres* recipients to which any remainder funds will be distributed among them.

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[3] Electronic Frontier Foundation has a 100% rating from Charity Navigator, https://www.charitynavigator.org/search?q=electronic+frontier+foundation.

[4] Gamers Outreach Foundation has a four star, 100% rating from Charity Navigator, https://www.charitynavigator.org/search?q=gamers+outreach+foundation.

[5] Girls Who Code Inc. has a 98% rating from Charity Navigator, https://www.charitynavigator.org/ein/300728021.

Dated: June 16, 2025

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E-FILING ATTESTATION

I, Kristin J. Moody, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above have concurred in this filing.

/s/ Kristin J. Moody
Kristin J. Moody

~~[PROPOSED]~~ ORDER

Having considered the foregoing, and good cause appearing therefore, the Court approves the foregoing stipulation and the Final Judgment is amended to remove AbleGamers as the *cy pres* recipient and to substitute Child's Play Charity, Code.org, Electronic Frontier Foundation, Gamers Outreach Foundation, and Girls Who Code, Inc. as the *cy pres* recipients to which any remainder funds will be distributed among them.

IT IS SO ORDERED.

Dated: June 16, 2025

HONORABLE LAUREL BEELER
UNITED STATES MAGISTRATE JUDGE