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 13 **UNITED STATES DISTRICT COURT**
 14 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

15
 16 In Re Quantcast Advertising Cookie
 Litigation

CASE NO.: 2:10-cv-05484-GW

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 18 **NOTICE OF RELATED CASES**
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1 Pursuant to Civil L.R. 83-1.3.1, plaintiffs hereby submit this Notice of Related
2 Cases.

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4 The four cases which plaintiffs assert are related are as follows:

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6 1. *La Court, et al. v. Specific Media, Inc.*, Case No. 2:10-cv-01256-JVS
7 (VBKx).
- 8 2. *In Re Quantcast Advertising Cookie Litigation*, Case No. 2:10-CV-05484-
9 GW (JCGx).
- 10 3. *In Re Clearspring Flash Cookie Litigation*, Case No. 2:10-CV-05948-GW
11 (JCGx).
- 12 4. *Davis, et al. v. VideoEgg, Inc.*, Case No. 2:10-cv-07112-GW-JCG.

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14 The *Davis*, *In re Quantcast* and *In re Clearspring* actions have already been
15 related and are pending before the Honorable George H. Wu. The *La Court* action is
16 pending before the Hon. James V. Selna.

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18 The *La Court* action should be deemed related to the *Davis*, *In re Quantcast*,
19 and *In re Clearspring* actions because they call for determination of the same or
20 substantially related or similar questions of law which would entail substantial
21 duplication of labor if heard by different judges.

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23 Each of the four lawsuits is brought as a class action in which plaintiffs allege
24 they have been harmed by defendants' statutory violations and fraudulent and unfair
25 business practices, wherein plaintiffs' privacy, financial interests, and computer
26 security rights, were violated by the defendants. Defendants are alleged to have
27 committed such violations by setting "Flash cookies" on their putative class
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1 members' computers to circumvent the privacy and security controls class members
2 had implemented in their web browsers.

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4 Defendants are online advertising and web analytics companies that deploy
5 Flash cookie technology as well as their affiliated websites that participated in setting
6 Flash cookies on the computers of visitors to those websites. Each complaint alleges
7 that defendants knowingly authorized, directed, ratified, approved, acquiesced, and/or
8 participated in the complained-of conduct and did so without putative class members'
9 knowledge or authorization.

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11 The Honorable George H. Wu has already deemed the following actions
12 related to *In Re Quantcast Advertising Cookie Litigation*¹: *Godoy v. Quantcast*
13 *Corporation*, Case No. 2:10-cv-07662-GW-JCG; *Inzekostas v. Fox Entertainment*
14 *Group, et al.*, Case No. 2:10-cv-06586-GW-JCG²; *Rona v. Clearspring Technologies,*
15 *Inc.*, Case No. 2:10-cv-07786-GW-JCG; *White, et al. v. Clearspring Technologies,*
16 *Inc., et al.*, Case No. 2:10-cv-05948-GW-JCG.

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18 Accordingly, plaintiffs request that the *La Court, et al. v. Specific Media, Inc.*
19 action be deemed related to *In Re Quantcast Advertising Cookie Litigation, In Re*
20 *Clearspring Flash Cookie Litigation*, and *Davis, et al. v. VideoEgg, Inc.*, pursuant to
21 Civil L.R. 83-1.3.1 and that the Hon. George H. Wu, assigned to *In Re Quantcast*,
22 and *In Re Clearspring*, and *Davis* preside over all four actions.

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25 ¹ The following cases were consolidated and are now referred to as *In Re Quantcast*
26 *Advertising Cookie Litigation: Valdez, et al. v. Quantcast Corporation, et al.*, Case No. 2:10-cv-
05484-GW; and *Aguirre v. Quantcast Corporation, et al.*, Case No. 2:10-cv-05716-GW.

27 ² The Hon. George H. Wu consolidated the following actions into *In Re Clearspring*
28 *Flash Cookie Litigation: White, et al. v. Clearspring Technologies, Inc., et al.*, Case No. 2:10-cv-
05948-GW; and *Intzekostas v. Fox Entertainment Group, et al.*, Case No. 2:10-cv-05948-GW.

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Dated: November 15, 2010

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