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Via ECF, Email, and by Hand

January 20, 2011

The Hon. George H. Wu
United States District Judge
United States District Courthouse
312 North Spring Street
Los Angeles, CA 90012

Re: *In Re Quantcast Advertising Cookie Litig.*, No. 2:10-cv-05484-GW
In Re Clearspring Flash Cookie Litig., No. 2:10-cv-05948-GW

Supplemental information regarding proposed *cy pres* distributions

Dear Judge Wu:

We are interim class counsel in the above-captioned matters. We are writing, as requested by the Court, to notify the Court of proposed *cy pres* recipients of distributions from the Settlement Fund under the parties' proposed settlement currently before the Court on motion for preliminary approval.

The Representative Plaintiffs propose that the following organizations receive *cy pres* distributions from the Settlement Fund to fund research and education projects and activities to promote consumer awareness and choice regarding the privacy, safety, and security of electronic information from and about consumers. All of these organizations have demonstrated a nexus with the issues raised in the litigation, particularly, research and education related to avoidance of future harm to consumers. The Defendants had no role in selecting these recipients.

We propose that the following organizations each receive a \$250,000 *cy pres* award and a *pro rata* distribution of any monies remaining in the Settlement Fund following initial distributions to all *cy pres* recipients:

- Carnegie Mellon University, Pittsburgh, Pennsylvania—CyLab Usable Privacy and Security Laboratory (CUPS)
- Center for Democracy and Technology (CDT), Washington, D.C.
- Fordham Law School, New York, New York—Center on Law and Information Policy

- University of California–Berkeley, California—School of Information, for research and/or education conducted and/or supervised by Professor Deirdre Mulligan (50%) and School of Law, Center for Law & Technology (50%)

The following organizations would each receive a *cy pres* award of up to \$100,000:

- Computers Freedom & Privacy Conference (CFP), New York, New York
- Illinois Institute of Technology/Chicago-Kent Law School, Chicago, Illinois—Center for Information, Society and Policy
- University of California–Hastings College of Law, San Francisco, California
- University of Houston Law Center, Houston, Texas—Center for Consumer Law
- Vanderbilt University Law School, Nashville, Tennessee

The following organizations would each receive a *cy pres* award of \$50,000:

- International Association of Privacy Professionals (IAPP), Portsmouth, New Hampshire
- The Privacy Projects, Nordland, Washington—Data Privacy Day
- Telecommunications Policy Research Conference (TPRC), Farnham, Virginia.

In addition, attached to this letter are courtesy copies of revised exhibits to the Settlement Agreement that are being filed today and that reflect the Court's instructions regarding clarification of language in the publication notice; identification of *cy pres* recipients in the longform notice; and plans for dissemination of notice in additional, technology-oriented publications.

Regarding notice dissemination in additional publications, the proposed notice now contemplates publication in *Information Week*, circulation 440,000 weekly, and *ComputerWorld*, circulation 165,000 bi-weekly. These are leading publications with readerships composed chiefly of information technology professionals.

Respectfully,


David A. Stampley
Partner, KamberLaw, LLC

Attachments