

# **EXHIBIT B**

## **EMAIL NOTICE**

To: XXXXXXXXXXXX  
From: XXXXXXXXXXXX  
Re: LEGAL NOTICE OF SETTLEMENT OF CLASS ACTION

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NOTICE OF PENDING CLASS ACTION AND NOTICE OF PROPOSED SETTLEMENT  
*PERKINS V. LINKEDIN CORP.*

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**You are receiving this e-mail because you may have used LinkedIn's Add Connections feature between September 17, 2011 and October 31, 2014.**

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

**Why did I get this notice?** This Notice relates to a proposed settlement ("Settlement") of a class action lawsuit ("Action") against LinkedIn Corporation ("LinkedIn") based on LinkedIn's alleged improper use of a service called "Add Connections" to grow its member base.

**What is the Action about?** The Action challenges LinkedIn's use of a service called Add Connections to grow its member base. Add Connections allows LinkedIn members to import contacts from their external email accounts and email connection invitations to one or more of those contacts inviting them to connect on LinkedIn. If a connection invitation is not accepted within a certain period of time, up to two "reminder emails" are sent reminding the recipient that the connection invitation is pending. The Court found that members consented to importing their contacts and sending the connection invitation, but did not find that members consented to LinkedIn sending the two reminder emails. The Plaintiffs contend that LinkedIn members did not consent to the use of their names and likenesses in those reminder emails. LinkedIn denies these allegations and any and all wrongdoing or liability. No court or other entity has made a judgment or other determination of any liability.

**What relief does the Settlement provide?** LinkedIn has revised disclosures, clarifying that up to two reminders are sent for each connection invitation so members can make fully-informed decisions before sending a connection invitation. In addition, by the end of 2015, LinkedIn will implement new functionality allowing members to stop reminders from being sent by canceling the connection invitation. LinkedIn has also agreed to pay \$13 million into a fund that can be used, in part, to make payments to members of the Settlement Class who file approved claims. Attorneys representing the Settlement Class will petition the Court for payment of the following from the fund: (1) reasonable attorneys' fees, expenses, and costs up to a maximum of \$3,250,000, and (2) service awards for the Plaintiffs up to a maximum of \$1,500 each. The payment amount for members of the Settlement Class who file approved claims will be calculated on a *pro rata* basis, which means that it will depend on the total number of approved claims. If the number of approved claims results in a payment amount of less than \$10, LinkedIn will pay an additional amount up to \$750,000 into the fund. If the *pro rata* amount is so small that it cannot be distributed in a way that is economically feasible, payments will be made, instead, to *Cy Pres* Recipients selected by the Parties and approved by the Court. No one knows in advance whether or in what amount payments will be made to claimants.

**You may also learn more by clicking on the following links:**

[Settlement Agreement](#)

[Class Action Complaint](#)

[Orders on Motions to Dismiss](#)

[Legal Representation](#)

[Attorneys' Fees](#)

[Cy Pres Recipients](#)

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		
<b>SUBMIT A CLAIM FORM</b>	If the Court gives final approval to the Settlement, this is the only way to be eligible to receive a payment.	Deadline: [Month] [Day], [Year]
<b>EXCLUDE YOURSELF</b>	This is the only option that allows you to retain your rights to sue LinkedIn about its alleged improper use of Add Connections to grow its member base.	Deadline: [Month] [Day], [Year]
<b>OBJECT</b>	<p>Write to the Court about why you object to (i.e., don't like) the Settlement and think it shouldn't be approved. You may mail your written objection to Judge Koh's Case System Administrator at the United States Courthouse, 280 South 1st Street, Room 2112, San Jose, CA 95113. Alternatively, you may file your written objection in person at any location of the United States District Court for the Northern District of California.</p> <p>You must also mail your written objection to Class Counsel and LinkedIn's Counsel. The address for Class Counsel is: Larry C. Russ, Esq., Russ August &amp; Kabat, 12424 Wilshire Boulevard, 12th Floor, Los Angeles, CA 90025. The address for LinkedIn's Counsel is: Jerome C. Roth, Esq., Munger, Tolles &amp; Olson LLP, 560 Mission Street, 27th Floor, San Francisco, CA 94105.</p>	Deadline: [Month] [Day], [Year]

<p><b>GO TO THE “FINAL APPROVAL HEARING”</b></p>	<p>The Court will hold a “Final Approval Hearing” to consider the Settlement, the request for attorneys’ fees and expenses of the lawyers who brought the Action (“Class Counsel”), and the request for service awards of the plaintiffs who brought the Action (“Class Representatives”).</p> <p>You may, but are not required to, speak at the Final Approval Hearing about your written objection. If you intend to speak at the Final Approval Hearing, you must include your intention to do so in your written objection. Follow the procedure described above for providing your written objection to the Court as well as to Class Counsel and LinkedIn’s Counsel.</p>	<p>Deadline: [Month] [Day], [Year]</p>
<p><b>DO NOTHING</b></p>	<p>You will not receive a payment, even if the Court gives final approval to the Settlement. You will also be giving up any claims you may have against LinkedIn based on its alleged improper use of Add Connections to grow its member base. You may be eligible to receive the non-monetary benefits of the Settlement, if the Court gives final approval to the Settlement.</p>	<p>No deadline</p>

**More information?** For more information about the Settlement and how to take the actions described above, please visit [www.\[xxx\].com](http://www.[xxx].com) or write to the Settlement Administrator at *Perkins v. LinkedIn Corp.*, Settlement, c/o Gilardi & Co. LLC [Address], [City], [State] [ZIP Code], [\[email@settlementname.com\]](mailto:[email@settlementname.com]). You may also contact Class Counsel by calling (xxx) xxx-xxxx.

**Do Not Address Any Questions About The Settlement Or The Litigation To LinkedIn, The Clerk Of The Court, Or The Judge.**