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14 Attorneys for Plaintiff KIRILOSE MANSOUR

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
16 COUNTY OF RIVERSIDE

17 KIRILOSE MANSOUR, individually on behalf  
of himself and all others similarly situated,

18 Plaintiff,

19 vs.

20 BUMBLE TRADING, INC., a Delaware  
corporation; and DOES 1-10, inclusive, and each  
21 of them,

22 Defendants.  
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Case No. RIC1810011  
(Assigned to the Honorable Sunshine S. Sykes)

JOINT STIPULATION AND [PROPOSED]  
ORDER REQUESTING APPROVAL FOR (1)  
SUPPLEMENTAL NOTICE TO  
INADVERTENTLY OMITTED ABSENT  
CLASS MEMBERS; (2) EXTENSION OF  
TIME FOR CLASS MEMBERS TO FILE  
CLAIMS, OBJECTIONS, AND TO REQUEST  
EXCLUSION FROM SETTLEMENT; AND (3)  
CONTINUANCE OF HEARING DATE FOR  
FINAL APPROVAL MOTION

Complaint Filed: May 29, 2018

1           WHEREAS, the Court granted preliminary approval of Plaintiff’s Motion for Class Action  
2 Settlement Approval on July 1, 2021 and set the final approval hearing for October 7, 2021;

3           WHEREAS, pursuant to the preliminary approval order, initial notice was to be sent by July  
4 31, 2021, with claims to be submitted by October 1, 2021 and requests for exclusions and objections  
5 to be filed by September 16, 2021;

6           WHEREAS, also pursuant to the preliminary approval order, Plaintiff is to file his Motion for  
7 Attorney’s Fees, Costs, and Incentive Award by September 16, 2021 and Motion for Final Approval  
8 by September 10, 2021;

9           WHEREAS, since the Court granted preliminary approval of the settlement, Bumble and the  
10 Settlement Administrator began executing the notice plan and sent approximately 1.6 million notices  
11 to absent Class Members;

12           WHEREAS, on September 7, 2021, while collecting notice statistics for the final approval  
13 motion, Bumble’s counsel discovered that, while Bumble and the Settlement Administrator had  
14 successfully sent approximately 1.6 million notices to absent Class Members, Bumble inadvertently  
15 failed to send email notices to a group of approximately 750,000 additional Class Members and in-  
16 app notices to a group of approximately 380,000 additional Class Members who had not previously  
17 received notice (the “inadvertently omitted absent Class Members”);

18           WHEREAS, these notice issues are attested to in the declaration of Ronen Benchetrit  
19 submitted in support of final approval and filed on September 10, 2021;

20           WHEREAS, notice to the inadvertently omitted absent Class Members was begun on  
21 September 8, 2021 and will be completed on September 10, 2021;

22           WHEREAS, on September 7, 2021, Plaintiff and Defendant met and conferred telephonically  
23 regarding the issue and agreed that a revised notice version of the notice should be sent to the  
24 inadvertently omitted absent Class Members, advising them that the Parties would be sending a  
25 stipulation to the Court requesting it move the hearing, claim, request for exclusion, and objection  
26 dates to reflect the new proposal and to check the website for the latest information;

27           WHEREAS, a true and correct copy of this revised notice is attached hereto as Exhibit A;  
28

1 WHEREAS, on September 8, 2021, the Parties also directed the Claims Administrator to  
2 update the Settlement Website with a banner stating “Update: Please note that the deadlines for you  
3 to act have changed. The dates reflected on this website are pending approval from the Court  
4 overseeing this settlement. This website will be updated once the Court issues its ruling regarding  
5 the revised deadlines. Please continue to check the website for updates;”

6 WHEREAS, the Claims Administrator updated the website to include this notice on  
7 September 8, 2021;

8 WHEREAS, due to the deadline for objection and request for exclusion currently being  
9 September 16, 2021, the Parties agreed that this notice should be sent out and posted immediately to  
10 advise Class Members that the Parties would be seeking to extend the deadlines while the Parties  
11 prepared this stipulation;

12 WHEREAS, following Defendant sending out notice to the inadvertently omitted absent  
13 Class Members, the Parties have received an additional 10,000 claims, and additional claims are  
14 arriving daily;

15 WHEREAS, based on the new notice date of September 8, 2021, the hearing, claims, request  
16 for exclusion, and objection deadline should be extended to provide the newly noticed Class  
17 Members time to exercise their rights;

18 WHEREAS, these proposed dates are as follows:

	OLD DATE	NEW DATE
19 Claims Deadline	October 1, 2021	November 9, 2021
20 Exclusion Deadline	September 16, 2021	October 25, 2021
21 Objection Deadline	September 16, 2021	October 25, 2021
22 Hearing on Final Approval	October 7, 2021	November 17, 2021

23 WHEREAS, the Parties have obtained a reservation for the hearing date on November 17,  
24 2021;

25 WHEREAS, these revised dates will apply to all Class Members, even those previously  
26 noticed;  
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1 WHEREAS, Plaintiff has filed his Motion for Final Approval and Motion for Attorneys Fees  
2 and Costs so these may be reviewed by Class Members before the current objection deadline and  
3 proposed new objection deadline;

4 WHEREAS, Plaintiff requests permission to file a reply in support of the Motion for Final  
5 Approval and Motion for Attorney's Fees on October 29, 2021 to address updated claims,  
6 objections, and costs;

7 WHEREAS, pursuant to the Preliminary Approval Order, the Claims Administrator will  
8 provide notice of the continued hearing dates to any individual that files an objection.

9 NOW THEREFORE, the parties jointly request the following:

10 That the Court authorizes Bumble to provide notice by direct email to the inadvertently  
11 omitted absent Class Members in the form of Exhibit A as proposed;

12 That the time for Class Members to submit objections and exclusion requests be extended to  
13 October 25, 2021;

14 That the time for the Class Members to submit claims be extended to November 9, 2021;  
15 Plaintiff shall file a reply in support of the Motion for Final Approval and Motion for  
16 Attorney's Fees, Costs, and Incentive award by October 29, 2021; and

17 That the Final Approval Hearing be continued from October 7, 2021 at 8:30 a.m.  
18 November 17, 2021 at 8:30 a.m.

19 Respectfully submitted,

20 DATED: September 10, 2021

HUGHES HUBBARD & REED LLP  
RITA M. HAEUSLER

22 By:  \_\_\_\_\_

Rita M. Haeusler  
Attorneys for Defendant  
BUMBLE TRADING, INC.

1 DATED: September 10, 2021

LAW OFFICES OF TODD M. FRIEDMAN, P.C.  
TODD M. FRIEDMAN  
ADRIAN R. BACON

3 THE SOLIMAN FIRM  
4 STEVEN S. SOLIMAN

5 By: 

Adrian R. Bacon  
Attorneys for Plaintiff  
KIRILOSE MANSOUR

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1 **PROPOSED ORDER**

2 After full consideration of the parties' Joint Stipulation and [Proposed] Order Requesting  
3 Approval for (1) Supplemental Notice to Inadvertently Omitted Absent Class Members; (2)  
4 Extension of Time for Class Members to File Claims and Objections and to Request Exclusion from  
5 Settlement; and (3) Continuance of Hearing Date for Final Approval Motion, and GOOD CAUSE  
6 APPEARING, the Court hereby approves the revised stipulated schedule as follows:

7 Bumble shall provide notice by direct email in the form of Exhibit A attached to the  
8 stipulation and in-app notification to the inadvertently omitted absent Class Members no later than  
9 September 10, 2021;

10 The time for Class Members to submit objections and exclusion requests shall be on or  
11 before October 25, 2021;

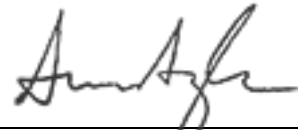
12 The time for Class Members to submit claims shall be on or before November 9, 2021;

13 The Final Approval Hearing shall be continued from October 7, 2021 at 8:30 a.m. November  
14 17, 2021 at 8:30 a.m.; and

15 Plaintiff shall file a reply in support of the Motion for Final Approval and Motion for  
16 Attorney's Fees, Costs, and Incentive award by October 29, 2021.

17  
18 IT IS SO ORDERED.

19 09/14/2021



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21 Honorable Sunshine S. Sykes  
22 Judge of the Superior Court  
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EXHIBIT A



**Hello there,**

**The prior notice sent on September 7, 2021 had incomplete hyperlinks and dates. The issue has been fixed, and the correct links and dates have been added. These updated dates are subject to Court approval, and the Settlement Website will have the most up to date information. Please refer to the corrected links below to make a claim or access other case information.**

**TO BUMBLE DATING APP USERS WHO SUBSCRIBED TO THE BUMBLE DATING APP BETWEEN MAY 29, 2016 AND JULY 1, 2021, WHO IDENTIFIED ON THE APP AS A MAN INTERESTED IN WOMEN, AND WHO RESIDED IN CALIFORNIA: BASED ON BUMBLE'S RECORDS, YOU MAY BE A MEMBER OF A CLASS FOR PURPOSES OF A CLASS ACTION SETTLEMENT. THIS NOTICE MAY AFFECT YOUR RIGHTS. PLEASE READ IT CAREFULLY.**

***A California state court authorized this Notice.***

**How Do I Know If I Am Affected By The Settlement?**

For purposes of settlement only, the Court has certified a Class consisting of Bumble users in California, who used the Bumble Dating Application during the period between May 29, 2016 and July 1, 2021 (the "Class Period"), and identified as a man interested in women. If you are a member of the Class, you will be bound by the settlement and judgment in this case, unless you request to be excluded.

**What Is The Lawsuit About?**

The plaintiff, Kirilose Mansour ("Mansour"), filed a lawsuit in the Superior Court of California, County of Riverside, against Bumble Trading, Inc. ("Bumble"), called Kirilose Mansour v. Bumble Trading Inc., Case No. RIC1810011. Mansour claims that Bumble discriminated



against male users of its dating app platform who identified as interested in women, through its practice of permitting only women to message first. The lawsuit alleges that differentiating the products and services offered between male users interested in women and other users violates state anti-discrimination laws and amounts to unlawful and unfair competition. Mansour filed the lawsuit on behalf of a class of male users interested in women, seeking damages, restitution and injunctive relief.

Bumble strongly denies any wrongdoing and denies that the practice is unlawful or discriminatory, but has agreed to settle the Lawsuit in order to avoid the burden and cost of further litigation.

The Court has not determined whether Mansour or Bumble is correct. The Court has determined only that there is sufficient evidence to suggest that the proposed settlement might be fair, adequate, and reasonable, and that a final determination of those issues with respect to the proposed settlement will be made at the final hearing.

#### **Why Is This Case Being Settled?**

This case was filed on May 29, 2018, and since then Mansour and Bumble, through their counsel, have investigated each other's claims and defenses. After attending mediation before a former California Superior Court judge, the parties and their counsel determined that the settlement described below is preferable to incurring the risks and costs of further litigation. Again, Bumble denies any wrongdoing or liability in connection with this settlement. Mansour and his counsel are satisfied that the terms and conditions of the proposed settlement are fair, reasonable, adequate, equitable, and in the best interest of the Class Members. On July 1, 2021 the Court preliminarily approved the settlement and authorized the parties to provide this Notice of the settlement to the Class. Postlethwaite & Netterville ("the Settlement Administrator") is administering the settlement and may be contacted at P.O. Box 1429, Baton Rouge, LA 70821 or via the settlement website, [www.BumbleMessagingSettlement.com](http://www.BumbleMessagingSettlement.com).

#### **What Can I Get In The Settlement?**

Subject to final Court approval, every Class Member who has an active Bumble dating app account on the Notice Date (as defined in settlement agreement, which is available on the settlement website) who does not ask to be excluded will automatically receive a one-time deposit of 20 free Super Swipes, to be delivered directly to each Class Member's Bumble dating app account. In addition, every Class Member who submits a valid and timely claim form will receive a pro rata share from a distributable settlement fund of \$3 million, less costs of suit, administration expenses, and incentive award, which costs, expenses and award are anticipated not to exceed \$159,059. Any Class Member who does not have an active Bumble dating app account or opts not to receive 20 free Super Swipes and submits a valid and timely claim electing to do so will receive two portions of the pro rata share from the distributable settlement fund. It is anticipated based on an expected 5% claims rate that the pro rata share will be approximately \$30, however this number may significantly vary up or down based on the number of claims submitted, which will not be known until after the claims deadline has passed. Bumble will also agree to revise its practices with respect to male

users who identify as interested in women.

### **Do I Need To Make A Claim?**

You do not need to make a claim to receive the 20 free Super Swipes. After the Effective Date of the settlement (which will occur at or after the time the Court finally approves the settlement), Bumble will automatically deposit 20 free Super Swipes into active Bumble dating app accounts.

You do need to make a claim to receive the additional monetary benefits described above. To make a claim, you must complete a claim form, which is available at the settlement website. You can complete the form online, or you can print it, fill it out and mail it to the address shown on the form. Claim forms are due by **November 9, 2021**.

### **What Do Mansour And His Lawyers Get?**

To date, Mansour's counsel have not been compensated for any work or out-of-pocket expenses on this case. As part of the settlement, Mansour's counsel may apply to the Court for an award of up to \$3.25 million in attorneys' fees, to be paid separately by Bumble. Mansour's counsel may also apply to the Court for reimbursement of reasonable costs and expenses in an amount not to exceed \$50,000, to be paid from the settlement fund. In addition, Mansour may apply to the Court for an award of up to \$10,000 as an incentive for having taken the time, effort and risk in pursuing the lawsuit and for executing a broader release of claims than other Class Members.

Mansour and his counsel will apply to the Court no later than **September 9, 2021**, for an award of attorneys' fees, costs, and expenses and a plaintiff incentive award. The Court will determine the amount of fees, costs, expenses, and incentive to award, up to the limits set forth above.

### **What Claims Are Released By The Settlement?**

The settlement releases all claims, by Class Members who do not exclude themselves from the settlement, against Bumble and its affiliates Bumble, Inc., Bumble Trading LLC, Bumble Holding Limited, Badoo Trading Limited, Badoo Limited, Bumble IP Holdco LLC that were or could have been asserted in the lawsuit regarding Bumble's practice of differentiating the services it offered to male users who identified as interested in women.

### **How Do I Exclude Myself From The Settlement?**

You can exclude yourself from the Class if you want to be able to sue Bumble separately for the claims released by the settlement. However, if you exclude yourself, you will not receive any benefits offered in the settlement, nor will you be permitted to object to the settlement.

To exclude yourself, you must either mail the exclusion form available **HERE** to the Settlement Administrator Postlethwaite & Netterville, P.O. Box 1429, Baton Rouge, LA 70821, or complete the online exclusion form on the settlement website, [www.BumbleMessagingSettlement.com](http://www.BumbleMessagingSettlement.com). The form must be postmarked or submitted by **October 25, 2021**.

You may rescind your request for exclusion from the settlement by providing written notice

of withdrawal to the Settlement Administrator no more than fourteen (14) days after the Final Approval Hearing.

### **How Do I Object To The Settlement?**

If you are a Class Member and you believe the settlement is unfair or inadequate, you may object to the settlement by either mailing the objection form available **HERE** to the Settlement Administrator Postlethwaite & Netterville, P.O. Box 1429, Baton Rouge, LA 70821, or by completing the online objection form on the settlement website. You may also appear at the hearing on final approval of the settlement but your appearance is not required for the Court to consider your objection.

The deadline for mailing or submitting the Objection is **October 25, 2021**.

### **When Will The Court Decide If The Settlement Is Approved?**

The Court will hold a final approval hearing on **November 11, 2021**, to consider whether to approve the settlement. The hearing will be held in Department 6 of the Superior Court of California County of Riverside, located at 4050 Main Street, Riverside, CA 92501. The hearing is open to the public. If you object to the settlement, the Settlement Administrator will provide notice to you if the hearing is moved. You do not need to appear at the hearing to receive the benefits of the settlement, if approved.

### **How Do I Get More Information?**

Documents connected with this case will be posted on the settlement website, at [www.BumbleMessagingSettlement.com](http://www.BumbleMessagingSettlement.com). The Settlement Agreement will be available on that website. You can also obtain information by contacting Mansour's counsel at Law Offices of Todd M. Friedman P.C., 21550 Oxnard Street, Suite 780, Woodland Hills, CA 91367 (877) 619-8966. Additionally, you can obtain the Settlement Agreement either physically from the Court at 4050 Main Street, Riverside, CA 92501; or from the Court's Website, <https://www.riverside.courts.ca.gov/> and referencing Case Number RIC1810011.

The Settlement Agreement is attached as Exhibit A to the Declaration of Todd M.

Friedman filed on May 9, 2021.

Do not call or contact the Court concerning this notice, the settlement, or the lawsuit.

[More info](#)

 App Store

 Google Play



You're receiving this email because you created an account with Bumble.

Bumble Trading LLC is a company registered in the United States with its registered office at 1105 W 41st Street, Austin, TX  
78756

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age of 18  
3 and not a party to the within action. My Business Address is 21031 Ventura Blvd, Suite 340  
4 Woodland Hills, CA 91364.

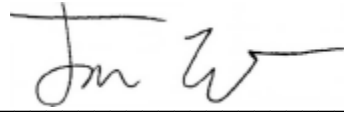
5 On September 10, 2021, I served the following document(s) described as: **JOINT**  
6 **STIPULATION AND [PROPOSED] ORDER REQUESTING APPROVAL FOR (1)**  
7 **SUPPLEMENTAL NOTICE TO INADVERTENTLY OMITTED ABSENT CLASS**  
8 **MEMBERS; (2) EXTENSION OF TIME FOR CLASS MEMBERS TO FILE CLAIMS,**  
9 **OBJECTIONS, AND TO REQUEST EXCLUSION FROM SETTLEMENT; AND (3)**  
10 **CONTINUANCE OF HEARING DATE FOR FINAL APPROVAL MOTION,** on all  
11 interested parties in this action by placing:

- 12  a true copy  
13  the original thereof enclosed in sealed envelope(s) addressed as follows:

14 Rita Hauesler  
15 HUGHES HUBBARD  
16 rita.haesler@hugheshubbard.com  
17 Attorneys for Defendant

- 18  BY FACSIMILE – The facsimile machine us  
19  BY EMAIL  
20  STATE – I declare under penalty of perjury under the laws of the State of  
21 California that the above is true and correct.

22 Executed on September 10, 2021, at Los Angeles, California.

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By:   
Thomas Wheeler