

EXHIBIT F

Proposed Cy Pres Recipients

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1. Educational Institutions
 - a. Berkman Center for Internet and Society (Harvard Law School)
 - b. MIT Internet Policy Research Initiative
 - c. Center for Internet and Society (Stanford Law School)
 - d. Information Law Institute (NYU Law School)
 - e. Berkeley Center for Law and Technology (Berkeley Law School)
2. MacArthur Foundation
3. ConnectSafely.org
4. Consumer Privacy Rights Fund (part of Rose Foundation for Communities and the Environment)
5. Data & Society Research Institute
6. National Cyber Security Alliance
7. National Consumer Law Center
8. ACLU or ACLU Foundation
9. Center for Democracy and Technology

Pursuant to the terms of the Settlement Agreement, should the Court order *cy pres*, the parties propose the educational institutions listed in No. 1 receive 12% of the Net Settlement Fund divided equally amongst the five institutions (a)-(e), and that the entities listed in Nos. 2-9 each receive 11% of the Net Settlement Fund.