

1 PERKINS COIE LLP

2 Alisha C. Burgin, Bar No. 286269

ABurgin@perkinscoie.com

3 1888 Century Park East, Suite 1700

4 Los Angeles, California 90067-1721

Telephone: 310.788.9900

5 Facsimile: 310.788.3399

6 Nicola C. Menaldo (*pro hac vice application forthcoming*)

7 NMenaldo@perkinscoie.com

8 Anna Mouw Thompson (*pro hac vice application forthcoming*)

AnnaThompson@perkinscoie.com

9 1301 Second Avenue, Suite 4200

10 Seattle, Washington 98101-3804

Telephone: 206.359.8000

11 Facsimile: 206.359.9000

12 Attorneys for Defendant Triple Lift, Inc.

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14
15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA
17

18 SHARON MANIER, individually and
19 on behalf of all others similarly situated,

20 Plaintiff,

21 v.

22 TRIPLE LIFT, INC.,

23 Defendant.
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Case No. 5:25-cv-3223

DEFENDANT TRIPLE LIFT, INC.'S
NOTICE OF REMOVAL

[Removed from Superior Court of the
State of California, County of
Riverside, Case No. CVRI2505643]

Complaint Filed: November 25, 2025

1 **TO THE CLERK OF THE ABOVE-ENTITLED COURT:**

2 PLEASE TAKE NOTICE that defendant Triple Lift, Inc. (“TripleLift”)
3 hereby removes this civil action from the Superior Court of the State of California,
4 County of Riverside, to the United States District Court for the Central District of
5 California pursuant to 28 U.S.C. §§ 1332(d), 1441(a), 1446 and 1453. TripleLift
6 hereby provides a short and plain statement of the grounds for removal pursuant to
7 28 U.S.C. § 1446(a).

8 **BACKGROUND**

9 1. On November 25, 2025, Plaintiff Sharon Manier (“Plaintiff”) filed an
10 amended complaint for the first time naming Triple Lift, Inc. as a defendant in the
11 civil action entitled *Sharon Manier, individually and on behalf of all others*
12 *similarly situated v. Triple Lift, Inc.*, Case No. CVRI2505643, in the Superior Court
13 of the State of California, County of Riverside. A true and correct copy of the
14 amended complaint is attached as Exhibit A (“Complaint” or “Compl.”).¹

15 2. The Complaint alleges that TripleLift is a registered “data broker and
16 advertising technology company” that “tracks consumers across the internet” by
17 participating in “real-time bidding” auctions and by deploying “tags, pixels, and
18 persistent cookies through its advertising platform.” *See, e.g.*, Compl. ¶¶ 2, 6.
19 TripleLift allegedly engages in online tracking “to help its clients sell advertising
20 space on their websites.” *Id.* ¶ 10. According to the Complaint, “TripleLift gathers
21 sensitive personal information without users’ knowledge or consent, creating
22 detailed profiles that it uses for commercial purposes.” *Id.* ¶ 12.

23 3. The Complaint asserts six causes of action: (1) violation of the
24 California Invasion of Privacy Act (CIPA), California Penal Code section 631 (*id.*
25 ¶¶ 47-56); (2) violation of California Penal Code section 638.51 (*id.* ¶¶ 57-62);
26 (3) violation of the California Comprehensive Computer Data Access and Fraud
27

28 ¹ An earlier complaint named as a defendant an unrelated entity, Triple Lift Global Ltd. That entity is no longer named as a defendant in the action.

1 Act (CDAFA), California Penal Code section 502 (*id.* ¶¶ 63-69); (4) invasion of
 2 privacy in violation of Article I, section 1 of the California Constitution (*id.* ¶¶ 70-
 3 81); (5) violation of California’s Unfair Competition Law, California Business &
 4 Professional Code section 17200 (*id.* ¶¶ 82-92); and (6) common law invasion of
 5 privacy and intrusion upon seclusion (*id.* ¶¶ 93-104).

6 4. Plaintiff seeks to represent a proposed class of “[a]ll California
 7 residents who visited a website with TripleLift’s surveillance technology, including
 8 bidder tags, tracking pixels, and RTB endpoint, or who otherwise had their personal
 9 information collected by TripleLift through its technology, during the Class
 10 Period.” *Id.* ¶ 40.

11 5. Plaintiff seeks “statutory damages, disgorgement of profits, punitive
 12 damages, costs, and attorneys’ fees,” as well as “[a]n injunction requiring
 13 Defendant to cease all unlawful activities.” *Id.* at Prayer for Relief.

14 6. TripleLift accepted service of the Complaint on December 1, 2025.
 15 See Ex. B (email confirmation). Other than the Complaint, no other process,
 16 pleadings, or orders have been served on TripleLift. See 28 U.S.C. § 1446(a).

17 **REMOVAL IS PROPER UNDER THE CLASS ACTION FAIRNESS ACT**

18 7. An action is removable if a federal court has original jurisdiction over
 19 the action. See 28 U.S.C. § 1441(a). The Class Action Fairness Act of 2005
 20 (“CAFA”) vests federal courts with original jurisdiction over putative class actions
 21 in which: (1) the aggregate number of members in the proposed class consists of at
 22 least 100 members; (2) the parties are minimally diverse, meaning “any member of
 23 a class of plaintiffs is a citizen of a State different from any defendant;” and (3) the
 24 aggregated amount in controversy “exceeds the sum or value of \$5,000,000,
 25 exclusive of interests and costs.” 28 U.S.C. § 1332(d)(2), (d)(5)(B). For the
 26 following reasons, these requirements are met.

27 ***The Proposed Class Consists of at Least 100 Members***

28 8. CAFA defines “class action” as “any civil action filed under rule 23 of

1 the Federal Rules of Civil Procedure or similar State statute or rule of judicial
 2 procedure authorizing an action to be brought by 1 or more representative persons
 3 as a class action.” 28 U.S.C. § 1332(d)(1)(B). The Complaint includes “Class
 4 Action Allegations,” and Plaintiff brings claims on behalf “of herself and a Class of
 5 others similarly situated.” Compl. ¶ 40. This action is thus a putative class action
 6 for purposes of CAFA.

7 9. The proposed class is comprised of more than 100 people. Plaintiff
 8 alleges that “hundreds of thousands, if not millions, of consumers . . . fall into the
 9 class definition.” *See id.* ¶ 41; *see also id.* ¶ 4 (“Plaintiff brings this action on behalf
 10 of millions of Californians.”).

11 *Minimal Diversity Exists*

12 10. Diversity under CAFA exists if “any member of a class of plaintiffs is
 13 a citizen of a State different from any defendant.” 28 U.S.C. § 1332(d)(2)(A).
 14 A corporation is deemed to be a citizen of every state “by which it has been
 15 incorporated and . . . where it has its principal place of business.” 28 U.S.C.
 16 § 1332(c)(1).

17 11. Plaintiff alleges that she is a citizen of California. Compl. ¶ 5. And the
 18 putative class in this case is limited to California residents. *Id.* ¶ 40.

19 12. The Complaint alleges that Triplelift is “a New York corporation with
 20 its registered address at 53 W 23rd St. New York, NY 10010.”² *Id.* ¶ 6.

21 13. Because all proposed class members are citizens of California, and
 22 TripleLift, the only named defendant, is not a citizen of California, CAFA’s
 23 minimal diversity requirement is satisfied.

24 *The Amount in Controversy Exceeds \$5,000,000*

25 14. To remove a case from state court, the defendant must plead only “a
 26

27 ² In fact, TripleLift is a Delaware corporation with a principal place of
 28 business in New York. Thus, for diversity jurisdiction purposes, TripleLift is a
 citizen of New York and Delaware. *See* 28 U.S.C. § 1332(c)(1).

1 short and plain statement of the grounds for removal” setting forth “a plausible
 2 allegation that the amount in controversy exceeds the jurisdictional threshold.” *Dart*
 3 *Cherokee Basin Operating Co., LLC v. Owens*, 574 U.S. 81, 89 (2014); *Fritsch v.*
 4 *Swift Transportation Co. of Arizona, LLC*, 899 F.3d 785, 788 (9th Cir. 2018). This
 5 standard is satisfied when it is “facially apparent” from the complaint that the
 6 claims likely exceed \$5,000,000. *See Dart Cherokee*, 574 U.S. at 89. Moreover,
 7 “[t]he amount in controversy is simply an estimate of the total amount in dispute,
 8 not a prospective assessment of defendant’s liability.” *Lewis v. Verizon Commc’ns,*
 9 *Inc.*, 627 F.3d 395, 400 (9th Cir. 2010). The amount in controversy includes claims
 10 for monetary damages, restitution, penalties, attorneys’ fees if recoverable by
 11 statute or contract, and punitive damages. *Guglielmino v. McKee Foods Corp.*, 506
 12 F.3d 696, 700 (9th Cir. 2007).

13 15. Here, Plaintiff’s Complaint plausibly alleges an amount in controversy
 14 in excess of \$5,000,000, exclusive of interests and costs.

15 16. Plaintiff seeks to represent a purported class of “millions of
 16 Californians.” Compl. ¶ 105. And Plaintiff alleges that she and the “millions” of
 17 proposed class members are each entitled to \$5,000 in statutory damages under
 18 California Penal Code section 673.2 for each violation of CIPA sections 631(a) and
 19 638.51. *See id.* ¶¶ 56, 62. It is therefore “facially apparent” that the amount in
 20 controversy exceeds \$5,000,000.

21 ***None of CAFA’s Exceptions Bar Removal***

22 17. This action does not fall within the exclusions to removal jurisdiction
 23 described in 28 U.S.C. §§ 1332(d)(4), (d)(9), or 28 U.S.C. § 1453(d).

24 18. Section 1332(d)(4) provides that a district court shall not exercise
 25 CAFA jurisdiction over a class action in which, among other things: “greater than
 26 two-thirds of the members of all proposed plaintiff classes in the aggregate are
 27 citizens of the State in which the action was originally filed” and “at least 1
 28 defendant is a defendant . . . who is a citizen of the State in which the action was

originally filed.” 28 U.S.C. § 1332(d)(4)(A); *see also* 28 U.S.C. § 1332(d)(4)(B) (similarly excluding cases where “two thirds or more of” the class members and “the primary defendants, are citizens of the State in which the action was originally filed”). This exception does not apply here because the sole defendant, TripleLift, is not a citizen of California. *See* Compl. ¶ 6.

19. Sections 1332(d)(9) and 1453(d) exempt certain securities and corporate governance cases from CAFA’s broad jurisdictional grant. *See* 28 U.S.C. §§ 1332(d)(9), 1453(d) (limiting § 1332(d)(2) to cases arising under several sections of the Securities Act of 1933, several sections of the Securities Exchange Act of 1934, and certain state corporate governance laws). Those exceptions do not apply here because Plaintiff’s claims do not arise under the securities laws, nor do they involve state-centric corporate governance issues.

PROCEDURAL STATEMENT

This Filing is Timely

20. TripleLift accepted service of the Complaint on December 1, 2025. *See* Ex. B (email confirmation). This Notice of Removal is therefore timely under 28 U.S.C. § 1446(b) because TripleLift filed it within 30 days after accepting service. *See Murphy Bros., Inc. v. Michetti Pipe Stringing, Inc.*, 526 U.S. 344, 347-48 (1999) (30-day removal period triggered by formal service); *Destfino v. Reiswig*, 630 F.3d 952, 956 (9th Cir. 2011).

Venue of Removed Action

21. Venue properly lies in the United States District Court for the Central District of California, pursuant to 28 U.S.C. §§ 84(c) and 1441(a), because this “district and division embrac[es]” Riverside County, where the Complaint was initially filed.

Notice to State Court and Plaintiff

22. Pursuant to 28 U.S.C. § 1446(d), TripleLift is filing a copy of this Notice of Removal with the Superior Court of the State of California, County of

1 Riverside, where this case was originally filed, and serving a copy of this Notice of
2 Removal on Plaintiff.

3 ***Pleadings in the State Court***

4 23. In accordance with 28 U.S.C. § 1446(a), copies of all process,
5 pleadings, and orders served upon TripleLift in this action are attached as Exhibit
6 A.

7 **NON-WAVIER OF DEFENSES**

8 24. TripleLift expressly reserves all its defenses. By removing the action
9 to this Court, TripleLift does not waive any rights or defenses available under
10 federal or state law. Nothing in this Notice of Removal should be taken as an
11 admission that Plaintiff's allegations are sufficient to state a claim or have any
12 substantive merit. In addition, TripleLift does not concede that Plaintiff states any
13 claim upon which relief can be granted, or that Plaintiff or the putative class are
14 entitled to any relief of any kind or nature. *See Lewis*, 627 F.3d at 400 ("The
15 amount in controversy is simply an estimate of the total amount in dispute, not a
16 prospective assessment of defendant's liability."); *LaCross v. Knight Transp. Inc.*,
17 775 F.3d 1200, 1203 (9th Cir. 2015) (plaintiffs should not "conflat[e] the amount in
18 controversy with the amount of damages actually recoverable."). If any questions
19 arise as to the propriety of the removal of this action, TripleLift respectfully
20 requests the opportunity to submit additional papers and to present oral argument.

21 WHEREFORE, TripleLift hereby removes the above-entitled case to this
22 Court.

1
2 Dated: December 1, 2025

PERKINS COIE LLP

3
4 By: /s/ Alisha C. Burgin

Alisha C. Burgin, Bar No. 286269

5 ABurgin@perkinscoie.com

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7 Attorney for Defendant
8 Triple Lift, Inc.
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CERTIFICATE OF SERVICE

I, Ernesto Monne, declare:

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 1888 Century Park E., Suite 1700, Los Angeles, California 90067-1721. On December 1, 2025, I served a copy of the within document(s):

DEFENDANT TRIPLE LIFT, INC.'S NOTICE OF REMOVAL

- ☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States Mail at Los Angeles, California addressed as set forth below.
- ☒ by transmitting via my electronic service address (*EMonne@perkinscoie.com*) the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

James C. Shah
Kolin C. Tang
MILLER SHAH LLP
8730 Wilshire Blvd., Suite 400
Los Angeles, CA 90211
Telephone: (866) 540-5505
Email: jcsah@millershah.com
kctang@millershah.com

Kyle Shamberg
CARROLL SHAMBERG, LLC
111 W. Washington St., Suite 1240
Chicago, IL 60602
kyle@csclassactions.com
Phone: (872) 215-6205

Attorneys for Plaintiff Sharon
Manier and the Proposed Class

Don Bivens
DON BIVENS PLLC
15169 N. Scottsdale Rd., Suite 205
Scottsdale, AZ 85254
Telephone: (602) 762-2661
Email: don@donbivens.com

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I declare under penalty of perjury under the laws of the State of California
that the above is true and correct.

Executed on December 1, 2025, at Los Angeles, California.



Ernesto Monne

Exhibit A

Electronically FILED by Superior Court of California, County of Riverside on 11/25/2025 02:54 PM
Case Number CVRI2505643 0000149380850 - Jason B. Galkin, Executive Officer/Clerk of the Court By Kristen King, Clerk

James C. Shah (SBN #260435)

Email: jcshah@millershah.com

Kolin C. Tang (SBN #279834)

Email: kctang@millershah.com

MILLER SHAH LLP

8730 Wilshire Blvd., Suite 400

Los Angeles, CA 90211

Telephone: (866) 540-5505

Facsimile: (866) 300-7367

*Counsel for Plaintiff and the Proposed Class
(Additional Counsel on Signature Page)*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

SHARON MANIER individually and on
behalf of all others similarly situated,

Plaintiff,

v.

TRIPLELIFT INC., a New York
Corporation.

Defendant.

Case No.: CVRI2505643

**FIRST AMENDED CLASS ACTION
COMPLAINT FOR:**

1. Violation of Cal. Penal Code § 631;
2. Violation of Cal. Penal Code § 638.51;
3. Violation of Cal. Penal Code § 502;
4. Violation of the California Constitution Art. 1, § 1;
5. Violation of Cal. Bus. & Prof. Code § 17200, *et seq.*; and
6. Common Law Invasion of Privacy – Intrusion Upon Seclusion.

DEMAND FOR JURY TRIAL

FIRST AMENDED CLASS ACTION COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff Sharon Manier¹ (“Plaintiff”), individually and on behalf of all others similarly situated, brings this Class Action Complaint and Demand for Jury Trial against Defendant TripleLift Inc. (“Defendant” or “TripleLift”) for surreptitiously collecting consumers’ web browsing activities. Plaintiff alleges as follows upon personal knowledge as to herself and her own acts and experiences, and, as to all other matters, upon information and belief.

NATURE OF THE ACTION

1. This lawsuit challenges Defendant TripleLift’s vast data surveillance of California residents’ internet activities without their knowledge or consent.

2. TripleLift is a data broker and advertising technology company that secretly tracks consumers across the internet through two mechanisms: (1) collection of data of website users and its dissemination to bidders in “real-time bidding” auctions, where the visitors never authorized TripleLift to collect and disseminate their information; and (2) deployment of tags, pixels, and persistent cookies through its advertising platform, which serve as the foundation for tracking, profiling, and user identification across sites and over time.

3. TripleLift’s surreptitious interception of users’ communications violates California’s wiretapping laws. Its systematic collection of IP addresses and routing information without a court order also violates California’s pen register statute. And its unauthorized access to users’ devices to extract personal data violates multiple other privacy protections under California law.

4. Plaintiff brings this action on behalf of millions of Californians whose privacy has been invaded by TripleLift’s unlawful tracking, seeking damages, restitution, and injunctive relief to stop these violations.

PARTIES

5. Sharon Manier is a citizen of California who resides in Riverside, CA.

6. Defendant TripleLift Inc. is a New York corporation with its registered address at 53

¹ Plaintiff files this First Amended Complaint solely to correct the name of the Defendant, which was misstated in the original Complaint. No substantive changes have been made to the allegations, claims, or parties other than correcting the Defendant’s name.

1 W 23rd St, New York, NY 10010. TripleLift maintains an active presence throughout the United
2 States and is registered as a data broker with the California Privacy Protection Agency.

3 **JURISDICTION AND VENUE**

4 7. This Court has jurisdiction pursuant to Article VI, Section 4 of the California
5 Constitution and Code of Civil Procedure Section 410.10.

6 8. This Court has personal jurisdiction over Defendant because Defendant conducts
7 significant business throughout the State of California. Moreover, TripleLift is a registered data
8 broker in California, and it has purposefully directed its conduct toward California residents.
9 Through the deployment of its tracking technology on widely accessed websites, TripleLift caused
10 the unauthorized interception and collection of data from California residents while they were
11 physically located in the state, constituting significant, continuous, and pervasive contacts with the
12 State of California.

13 9. Venue is proper pursuant to Code of Civil Procedure § 395.5 because the obligation
14 or liability giving rise to this action arose in this county.

15 **COMMON FACTUAL ALLEGATIONS**

16 10. TripleLift is a technology firm and registered data broker that operates in the world
17 of “programmatic advertising,” which refers to the automated process of buying and selling ad
18 space online. TripleLift’s business is to help its clients sell advertising space on their websites
19 through high-speed, background auctions for ad space on websites . The company promises
20 publishers that they will “get the most competitive price” for their “inventory.”

21 11. To carry out its business, TripleLift must gather information about internet users.
22 To do so, it has developed a business model centered on the surreptitious surveillance and
23 collection of consumer data through two primary channels. First, it collects information through
24 its central role in automated advertising auctions known as “real-time bidding,” where it collects
25 data about internet users across thousands of websites. Second, it deploys tags, pixels, and
26 persistent cookies through its advertising platform, which serve as the foundation for tracking,
27 profiling, and user identification across sites and over time.

28 12. Through both mechanisms, TripleLift gathers sensitive personal information

1 without users' knowledge or consent, creating detailed profiles that it uses for commercial
2 purposes.

3 **A. Gathering and disseminating Personal Information Through Real Time Bidding**

4 13. TripleLift collects vast amounts of user data through its role in the "real-time
5 bidding" ("RTB") advertising ecosystem. This system enables TripleLift to gather personal
6 information from users across thousands of websites.

7 14. RTB is the automated auction system that determines which advertisements appear
8 on digital spaces such as websites. When a user visits a webpage containing ad space, an auction
9 occurs in the milliseconds before the page fully loads. During this auction, multiple advertising
10 companies compete to show their ad to that specific user, with the highest bidder winning the right
11 to display its advertisement. It is estimated that RTB is a \$117 billion industry which tracks and
12 shares what users view and real world location 178 trillion times a year in the US and Europe.²

13 15. This RTB ecosystem, which is complex and opaque, involves several types of
14 entities. Publishers are websites, apps, or digital platforms with advertising space to sell. Supply-
15 Side Platforms ("SSPs"), like TripleLift, are technology companies that help publishers maximize
16 ad space sales revenue by connecting them to multiple potential advertisers. As part of this
17 service, TripleLift transmits information about ad slots and associated users into auctions, where
18 Demand-Side Platforms ("DSPs") are the buyers. DSPs are hired by companies wanting to
19 advertise their products and services online.

20 16. Critically for privacy, during the auction process TripleLift transmits detailed user
21 information to all potential bidders. When an RTB auction for digital-advertising space occurs,
22 TripleLift sends "bid requests" to multiple DSPs. That request includes information such as the
23 user's IP address, device information, geolocation, browsing context, and available identifiers. The
24 DSPs will use this information to calculate whether and how much to bid in the auction. Each DSP
25 receives this data regardless of whether they bid or win, transforming the RTB system into a
26

27 ² Irish Council for Civil Liberties, *The Biggest Data Breach: ICCL report on the scale of Real-Time*
28 *Bidding data broadcasts in the U.S. and Europe* (May 16, 2022), <https://www.iccl.ie/news/iccl-report-on-the-scale-of-real-time-bidding-data-broadcasts-in-the-u-s-and-europe/> (last visited Sept. 14, 2025).

1 massive data collection network.

2 **B. Tracking users with Tags, Pixels, and Persistent Cookies.**

3 17. TripleLift's presence on publishers' pages typically takes the form of small pieces
4 of code that include tags and pixels. When those tags or pixels run, the user's browser
5 automatically makes network calls to TripleLift's servers, sending standard request headers (IP
6 address, user-agent, referrer) and additional signals the code collects (page context,
7 device/browser signals, and any readable identifiers). TripleLift uses those signals to build and
8 forward bid requests to demand partners (the DSPs), which then evaluate and submit bids.
9 Publishers integrate TripleLift's codes into their pages because it gives them access to more
10 buyers, richer targeting, and monetization.

11 18. In addition, TripleLift deploys "TLUID," a persistent cookie through its advertising
12 platform, which serves as the foundation for tracking, profiling, and user identification across sites
13 and over time. A cookie is a small text file that a web server instructs a browser to store on the
14 user's device. Once stored, the cookie is automatically included in future communications with
15 that server, allowing the server to recognize returning visitors.

16 19. The operation of these tracking tools is an essential component of TripleLift's
17 business model. Indeed, the more detailed the personal information TripleLift transmits in its bid
18 requests, the more commercially attractive it becomes to potential bidders as it enables more
19 accurate, individualized targeting of advertisements. In other words, bid requests that include rich
20 user and device signals (e.g., device identifiers, IP/geolocation, browsing context and behavioral
21 signals) allow DSPs to better predict value and conversion likelihood and therefore to submit
22 higher, more competitive bids; that increased informational richness thus directly amplifies
23 demand for, and the market value of, the ad opportunity.

24 ***C. Cookie Syncing: The Foundation of Cross Platform Data Collection and Dissemination***

25 20. To recognize users across domains and platforms, advertising entities engage in
26 cookie syncing. This process allows distinct systems (e.g., a DSP and an SSP) to align their
27 respective user identifiers through server-side exchanges or client-side pixel fires. ID syncing is
28 done via redirects, pixel calls and match tables—enabling persistent cross-site tracking before any

1 ad auction occurs. The process is widespread and not transparent, exposing user data to numerous
2 unseen third parties without user awareness or control. ID syncing is essential for the RTB system
3 to function efficiently, allowing all parties, from SSPs to DSPs, to benefit from user data
4 circulation, while users remain unaware.

5 21. Cookie syncing addresses a fundamental challenge: different companies assign
6 different identifiers to the same user. A DSP might know a user as “User-123” while TripleLift
7 knows the same user as “tl-user-id-ABC.” Without synchronization, these platforms cannot
8 coordinate their tracking and advertising efforts.

9 22. The syncing process occurs automatically when users visit websites. Their browser
10 is invisibly redirected through multiple advertising domains in rapid succession, often dozens of
11 redirects within seconds. During each redirect, platforms read their tracking cookies, share
12 identifiers with each other, and build translation tables.

13 23. When TripleLift engages in cookie syncing during the RTB process, it enables
14 DSPs to match the personal information they receive from TripleLift, with information the DSPs
15 collected about the users across the internet. By establishing these identity connections, the RTB
16 transforms to a platform where bids are priced by users’ data across the entire internet.

17 24. Indeed, when DSPs recognize a user through a synced identifier during an auction,
18 they can instantly access its stored profile and bid strategically based on that user’s browsing
19 history, interests, and past website interactions. For instance, if a DSP knows that a user recently
20 searched for “breast cancer” on a medical website, it can bid more aggressively when that same
21 user appears on a news website, knowing the user may be receptive to medical device
22 advertisements. Without cookie syncing, DSPs would be bidding “blind,” resulting in lower offers
23 for the advertising space TripleLift is selling.

24 25. Moreover, cookie syncing allows DSPs to enrich the user profiles they hold
25 regardless of auction outcomes. Every bid request contains fresh information about users’ current
26 activities—which websites they’re visiting, when, and from where. This information is transmitted
27 to the DSPs at no cost. This free valuable data makes participation in the bidding process more
28 lucrative resulting in more competitive bidding.

1 26. Notably, individuals whose personal data is shared with bidders face imminent risk
 2 that their data will be sold and misused. Indeed, a letter penned by a group of bipartisan United
 3 States Senators noted that: “While only one company will win the auction, hundreds of firms
 4 participating receive sensitive information about the potential recipient of the ad—device
 5 identifiers and cookies, web browsing and location data, IP addresses, and unique demographic
 6 information such as age and gender ... Few Americans realize that some auction participants are
 7 siphoning off and storing “bidstream” data to compile exhaustive dossiers about them. In turn,
 8 these dossiers are being openly sold to anyone with a credit card, including to hedge funds,
 9 political campaigns, and even to governments.”³

10 27. Further raising alarm to this risk, last year, the Chair of the U.S. Federal Trade
 11 Commission warned that “the ease with which real-time bidding technology can be exploited to
 12 surveil Americans should raise serious alarm. Researchers report that no real safeguards limit who
 13 can access, harness, or retain this data, suggesting that the multi-billion-dollar industry built
 14 around targeted advertising may presently leave Americans’ sensitive data extraordinarily
 15 exposed.”⁴

16 28. The extent of data collected by TripleLift is of particular concern. The company
 17 boasts that it works “with 99% of the top publishers globally, offering billions of impressions
 18 across trusted content.” And its trackers have been found in 1539 of the 10,000 sites with the
 19 highest traffic worldwide.⁵

20 29. Furthermore, TripleLift’s bidder tags, tracking pixels, and RTB endpoints are
 21 present in websites where users seek highly private and sensitive information. By way of example,
 22 Health.com is a health and wellness website that provides articles, tips, and resources on topics
 23

24 ³ Letter from Ron Wyden et al. to John Stankey, Chief Executive Officer, AT&T Inc. (Apr. 1,
 25 2021), [https://www.cassidy.senate.gov/wp-](https://www.cassidy.senate.gov/wp-content/uploads/media/doc/040121%20Bidstream%20Letter%20to%20ATT.pdf)
 26 [content/uploads/media/doc/040121%20Bidstream%20Letter%20to%20ATT.pdf](https://www.cassidy.senate.gov/wp-content/uploads/media/doc/040121%20Bidstream%20Letter%20to%20ATT.pdf)

27 ⁴ Lina M. Khan, Statement of Chair Lina M. Khan Joined by Commissioner Alvaro M. Bedoya &
 28 Commissioner Rebecca Kelly Slaughter, In the Matter of Mobilewalla, Inc., Commission File No.
 2023196 (Dec. 3, 2024), [https://www.ftc.gov/system/files/ftc_gov/pdf/statement-khan-bedoya-](https://www.ftc.gov/system/files/ftc_gov/pdf/statement-khan-bedoya-slaughter-mobilewalla.pdf)
[slaughter-mobilewalla.pdf](https://www.ftc.gov/system/files/ftc_gov/pdf/statement-khan-bedoya-slaughter-mobilewalla.pdf)

⁵ Ghostery, *TripleLift*, WhoTracks.Me (last visited Sept. 15, 2025)
<https://www.ghostery.com/whotracksme/trackers/triplelift>

1 such as sexual health, reproductive health, and mental health. When a user visits Health.com,
2 multiple RTB auctions are triggered for the available ad spaces on the site. In these auctions,
3 TripleLift functions as a supply-side platform. As part of this role, it collects the page URL, device
4 characteristics, the user's IP address, and location. TripleLift uses this information to optimize its
5 bidding strategy in the RTB process. This occurs without informing the user or obtaining their
6 consent, allowing TripleLift to auction the user's attention to advertisers based on their profile.

7 **D. Lack of User Consent.**

8 30. Throughout all of these data collection activities, TripleLift operates without user
9 consent. When users visit websites participating in RTB, they have no knowledge that TripleLift is
10 collecting their personal information. Users are never presented with TripleLift's privacy policy,
11 never agree to TripleLift's data collection, and have no opportunity to opt out before their data is
12 transmitted to TripleLift's servers.

13 31. The data collection begins immediately when a webpage loads, before users can
14 review any privacy policies or make choices about tracking. Even when users consent to a
15 website's own privacy policy, this does not constitute consent for TripleLift's separate commercial
16 data collection. Users do not expect that visiting a medical website means agreeing to have their
17 health searches shared with a digital advertising company they've never heard of.

18 32. Most users remain entirely unaware that TripleLift exists, much less that it
19 maintains detailed profiles about them. They cannot consent to something they do not know is
20 occurring.

21 **E. Commercial Exploitation of User Data**

22 33. TripleLift monetizes the personal information it collects by operating as a data-
23 driven advertising space sales platform. The company uses the profiles it builds without consent to
24 offer increasingly sophisticated bid requests in order to maximize ad inventory sales revenue.

25 34. The scale of TripleLift's commercial exploitation is substantial. The company
26 generates approximately \$130 million in annual revenue. And in 2021, Vista Equity Partners
27 acquired a majority stake in TripleLift, reportedly investing \$1.4 billion.

28 35. TripleLift's registration as a data broker with the California Privacy Protection

1 Agency confirms the commercial nature of its data operations. As a registered data broker,
 2 TripleLift acknowledges that it collects personal information about consumers with whom it does
 3 not have a direct relationship and sells or licenses that information for commercial purposes. This
 4 registration places TripleLift squarely within California's regulatory framework for companies
 5 that traffic in personal data as a business model.

6 **FACTS SPECIFIC TO PLAINTIFF**

7 36. During the Class Period, Plaintiff visited one or more websites (specifically,
 8 www.prevention.com and www.weather.com) that deployed TripleLift's tracking technologies. On
 9 www.prevention.com, for example, Plaintiff used the search bar to search for information regarding
 10 her personal health and read articles on the website. Plaintiff's personal information, including her
 11 IP address, device information, browsing activity, and persistent user identifier, was intercepted and
 12 collected by TripleLift.

13 37. Upon information and belief, TripleLift identified Plaintiff and created a profile or
 14 profiles containing her likes and interests and shared personal information as part of its bid requests.

15 38. Plaintiff did not know, nor had reason to know, that unknown third party TripleLift
 16 surreptitiously collected and disseminated information about her web activity (including her IP
 17 addresses) and created profiles about her likes and interests.

18 39. Plaintiff did not know that TripleLift was collecting her personal information when
 19 she visited these websites. Plaintiff never gave TripleLift's consent to intercept her communications
 20 and collect data about them.

21 **CLASS ACTION ALLEGATIONS**

22 40. **Class Definition:** Plaintiff brings this proposed class action pursuant to California
 23 Code of Civil Procedure § 382 on behalf of herself and a Class of others similarly situated, defined
 24 as follows:

25 All California residents who visited a website with TripleLift's surveillance
 26 technology, including bidder tags, tracking pixels, and RTB endpoint, or who
 27 otherwise had their personal information collected by TripleLift through its
 28 technology, during the Class Period.

Excluded from the Class are: (1) any Judge or Magistrate presiding over this action
 and members of their families; (2) Defendant, Defendant's subsidiaries, parents,

1 successors, predecessors, and any entity in which Defendant or their parents have a
 2 controlling interest and its officers and directors; (3) persons who properly execute
 3 and file a timely request for exclusion from the Class; (4) persons whose claims in
 4 this matter have been finally adjudicated on the merits or otherwise released; (5)
 5 Plaintiff's counsel and Defendant's counsel; and (6) the legal representatives,
 6 successors, and assigns of any such excluded persons.

7
 8 41. **Numerosity:** The exact number of Class members is unknown and not available to
 9 Plaintiff at this time, but it is clear that individual joinder is impracticable. On information and
 10 belief, Defendant has surreptitiously collected and analyzed data from hundreds of thousands, if not
 11 millions, of consumers who fall into the definition of the Class. Class members can be identified
 12 through Defendant's records.

13 42. **Commonality and Predominance:** There are many questions of law and fact
 14 common to the claims of Plaintiff and the putative Class, and those questions predominate over any
 15 questions that may affect individual members of the Class. Common questions for the Class
 16 include, but are not necessarily limited to the following:

- 17 A. Whether Defendant read, attempted to read, or learned the content of the
- 18 communications made by Plaintiff and the Class;
- 19 B. Whether Defendant's actions were willful;
- 20 C. Whether Defendant had the capability to and/or used Plaintiff's' and the
- 21 Class members' communications for its own purposes,
- 22 D. Whether Defendant's software is a pen register;
- 23 E. Whether Defendant accessed Plaintiff's' and the Class members' computer
- 24 systems; and
- 25 F. Whether Defendant obtained consent from Plaintiff and Class members.

26 43. **Typicality:** Plaintiff's' claims are typical of the claims of the Class members in that
 27 Plaintiff, like all Class members, have been injured by Defendant's misconduct at issue.

28 44. **Adequate Representation:** Plaintiff will fairly and adequately represent and protect
 the interests of the Class and has retained counsel competent and experienced in complex litigation
 and class actions. Plaintiff's claims are representative of the claims of the other members of the
 Class. That is, Plaintiff and the Class members sustained damages as a result of Defendant's
 conduct. Plaintiff also has no interests antagonistic to those of the Class, and Defendant have no

1 defenses unique to Plaintiff. Plaintiff and her counsel are committed to vigorously prosecuting this
 2 action on behalf of the members of the Class and have the financial resources to do so. Neither
 3 Plaintiff nor her counsel have any interest adverse to the Class.

4 45. **Superiority:** Class proceedings are superior to all other available methods for the
 5 fair and efficient adjudication of this controversy, as joinder of all members of the Class is
 6 impracticable. Individual litigation would not be preferable to a class action because individual
 7 litigation would increase the delay and expense to all parties due to the complex legal and factual
 8 controversies presented in this Complaint. By contrast, a class action presents far fewer
 9 management difficulties and provides the benefits of single adjudication, economy of scale, and
 10 comprehensive supervision by a single court. Economies of time, effort, and expense will be
 11 fostered, and uniformity of decisions will be ensured.

12 46. Plaintiff reserves the right to revise the foregoing “Class Allegations” and “Class
 13 Definition” based on facts learned through additional investigation and in discovery.

14 **FIRST CAUSE OF ACTION**
 15 **Violation of Cal. Penal Code § 631**
 16 **(On behalf of Plaintiff and the Class)**

17 47. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

18 48. To establish liability under the California Invasion of Privacy Act (“CIPA”), §
 19 631(a), a plaintiff need only establish that a defendant, “by means of any machine, instrument,
 20 contrivance, or in any other manner,” does any of the following:

21 Intentionally taps, or makes any unauthorized connection, whether physically,
 22 electrically, acoustically, inductively or otherwise, with any telegraph or telephone
 23 wire, line, cable, or instrument, including the wire, line, cable, or instrument of any
 24 internal telephonic communication system,

25 *Or*

26 Willfully and without the consent of all parties to the communication, or in any
 27 unauthorized manner, reads or attempts to read or learn the contents or meaning of
 28 any message, report, or communication while the same is in transit or passing over
 any wire, line or cable or is being sent from or received at any place within this
 state,

Or

1 Uses, or attempts to use, in any manner, or for any purpose, or to communicate in
2 any way, any information so obtained,

3 *Or*

4 Aids, agrees with, employs, or conspires with any person or persons to unlawfully
5 do, or permit, or cause to be done any of the acts or things mentioned above in
6 this section.

7 49. Defendant's technical components, including bidder tags, tracking pixels, and RTB
8 endpoints are "machine[s], instrument[s], [and] contrivance[s]..." used to collect communications.

9 50. When Plaintiff and Class members communicate with websites by entering search
10 terms, clicking links, or viewing pages, these interactions constitute communications containing
11 content and meaning. This includes URLs visited, search terms entered, webpage content accessed,
12 and user interactions, all of which are "contents" of communications under CIPA.

13 51. Defendant, through components such as bidder tags, tracking pixels, and RTB
14 endpoints, intercepts these communications while they are in transit. Specifically, when users
15 interact with a website, the Pixel causes their browsers to simultaneously transmit the contents of
16 those communications to TripleLift's servers. This interception occurs in real-time as users'
17 communications are being sent to the intended website.

18 52. Defendant willfully read, analyzed, and learned the contents and meaning of these
19 intercepted communications. The transmitted data is processed by TripleLift systems to extract
20 URLs, search terms, user interactions, and other communication contents, which Defendant uses to
21 build detailed user profiles to provide detailed Bid Requests.

22 53. Plaintiff and Class members did not consent to Defendants intercepting, reading, or
23 using their communications. No notice was provided, and no opportunity to consent was given
24 before the interceptions began.

25 54. Defendant uses the intercepted communications for its own commercial purposes,
26 including building user profiles, enhancing advertising services, and generating revenue. This use
27 demonstrates that Defendant is not acting as a mere extension of the websites but as an independent
28 party exploiting intercepted communications.

55. Defendant's systematic interception and use of Plaintiff's and Class members'

1 communications while in transit violates Cal. Penal Code § 631(a).

2 56. Pursuant to Cal. Penal Code § 637.2, Plaintiff and the Class seek statutory damages
3 of \$5,000 per violation and injunctive relief.

4 **SECOND CAUSE OF ACTION**
5 **Violation of Cal. Penal Code § 638.51**
6 **(On behalf of Plaintiff and the Class)**

7 57. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

8 58. California law prohibits the installation of a pen register without first obtaining a
9 court order. Cal. Penal Code § 638.51.

10 59. The statute defines a “pen register” as “a device or process that records or decodes
11 dialing, routing, addressing, or signaling information transmitted by an instrument or facility from
12 which a wire or electronic communication is transmitted, but not the contents of a communication.”
13 Cal. Penal Code § 638.50(b).

14 60. Defendant’s bidder tags, tracking pixels, and RTB endpoints constitutes use of a
15 “pen register” because it is a process through which Defendant record addressing and signaling
16 information—specifically, Plaintiff’s and Class members’ IP addresses, the websites they visited,
17 derived location information, device identifiers, and other routing data—from electronic
18 communications transmitted by their devices. Defendant can systematically identify consumers,
19 gather routing information, and correlate this data across multiple websites and devices.

20 61. Defendant was not authorized by any court order to use a pen register to track
21 Plaintiff’s and Class members’ locations and personal information, nor did it obtain consent from
22 Plaintiff and the Class members to operate such a device.

23 62. Plaintiff and the Class seek injunctive relief and statutory damages in the amount of
24 \$5,000 per violation pursuant to Cal. Penal Code § 637.2.

25 **THIRD CAUSE OF ACTION**
26 **Violation of the California Comprehensive Computer Data Access and Fraud Act**
27 **Cal. Penal Code § 502**
28 **(On behalf of Plaintiff and the Class)**

63. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

64. The California Legislature enacted the Comprehensive Computer Data Access and

1 Fraud Act (“CDAFA”) to “expand the degree of protection afforded to individuals... from
2 tampering, interference, damage, and unauthorized access to lawfully created computer data and
3 computer systems.” Cal. Penal Code § 502(a). In enacting the statute, the Legislature emphasized
4 the need to protect individual privacy: “The Legislature further finds and declares that protection of
5 the integrity of all types and forms of lawfully created computers, computer systems, and computer
6 data is vital to the protection of the privacy of individuals.” *Id.*

7 65. Plaintiff’s and Class Members’ devices are “computers” or “computer systems”
8 within the meaning of § 502(b) because they are devices capable of being used in conjunction with
9 external files and perform functions such as logic, arithmetic, data storage and retrieval, and
10 communication.

11 66. Defendant violated the following sections of CDAFA § 502(c) because it:

12 (a) “Knowingly accesses and without permission... uses any data, computer, computer
13 system, or computer network in order to... wrongfully control or obtain money, property, or
14 data.” *Id.* § 502(c)(1).

15 (b) “Knowingly accesses and without permission takes, copies, or makes use of any data
16 from a computer, computer system, or computer network.” *Id.* § 502(c)(2).

17 (c) “Knowingly and without permission accesses or causes to be accessed any computer,
18 computer system, or computer network.” *Id.* § 502(c)(7).

19 67. Defendant knowingly “accessed” Plaintiff’s and the Class Members’ computers
20 and/or computer systems because it purposefully gained entry to and/or caused output from their
21 computers to obtain personal information, including browsing data, device identifiers, IP addresses,
22 and tracking cookies.

23 68. Plaintiff and the Class suffered damage and/or loss resulting from Defendant’s
24 conduct described herein. Specifically: (1) Defendant’s software occupied Plaintiff’s and the Class
25 members’ storage space on their devices without authorization; (2) Defendant’s software caused
26 data to be output from Plaintiff’s and the Class members’ devices; (3) Defendant’s acts used
27 computer resources of the device; and (4) Defendant was unjustly enriched and profited from the
28 data taken from Plaintiff and the Class.

69. Plaintiff and the Class now seek compensatory damages, injunctive relief, disgorgement of profits, other equitable relief, punitive damages, and attorneys' fees pursuant to § 502(e)(1)–(2).

FOURTH CAUSE OF ACTION
Invasion of Privacy
Violation of Art. 1, § 1 of the California Constitution
(On Behalf of Plaintiff and the Class)

70. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

71. “Privacy” is listed in Article I, Section 1, of the California Constitution as a fundamental right of all Californians. That section of the Constitution provides as follows: “All people are by nature free and independent and have inalienable rights. Among these are enjoying and defending life and liberty, acquiring, possessing, and protecting property, and pursuing and obtaining safety, happiness, and privacy.” Cal. Const. art. I, § 1.

72. The right to privacy in California’s Constitution creates a right of action against private entities such as Defendant. To state a claim for invasion of privacy under the California Constitution, a plaintiff must establish (1) a legally protected privacy interest; (2) a reasonable expectation of privacy; and (3) an intrusion so serious in nature, scope, and actual or potential impact as to constitute an egregious breach of social norms.

73. Plaintiff and Class members have a legally protected privacy interest in their IP addresses, location data, and other routing information that TripleLift captures without notice or consent when they access and view websites implementing TripleLift’s tracking technologies. These privacy interests are recognized by the California Constitution, CDAFA, and CIPA.

74. Plaintiff and Class members had a reasonable expectation of privacy concerning this data when navigating the internet. TripleLift is a third-party data broker with whom Plaintiff and Class members have no direct relationship, and TripleLift and its client-websites use Plaintiff’s and Class members’ online activities to collect their IP addresses, location data, device information, and other routing information across multiple unrelated websites. TripleLift also uses this information to build comprehensive profiles of their online activities.

75. The identifiable and private information TripleLift intercepted, stored, and used

1 without Plaintiff's and Class members' consent was used to track them consistently and persistently
2 across multiple websites and to serve targeted advertisements. The manner in which TripleLift
3 intercepted this information deliberately circumvented established privacy-protection mechanisms
4 and violated social norms.

5 76. Defendant's conduct constitutes an extremely serious invasion of privacy that would
6 be highly offensive to a reasonable person because: (i) the information collected by TripleLift is
7 personally identifying information protected by the California Constitution and numerous statutes;
8 (ii) TripleLifts creates and enables the creation of comprehensive profiles of users by linking their
9 activities across multiple unrelated websites and across multiple devices; (iii) Defendant did not
10 have authorization or consent to collect users' IP addresses and other routing information; and (iv)
11 this invasion deprived Plaintiff and Class members of the ability to control the dissemination and
12 use of their personal information, an ability that is a fundamental privacy right.

13 77. Reasonable individuals do not expect that there is an entity intercepting and
14 monitoring their personally identifiable online activity across multiple websites, let alone using this
15 information for profit through its cookie syncing and behavioral targeting services.

16 78. Defendant's conduct violated the privacy of hundreds of thousands (if not millions)
17 of Class members, including Plaintiff. Defendant did not have consent to intercept this information,
18 let alone use and monetize it.

19 79. As a direct and proximate result of Defendant's actions, Plaintiff and Class members
20 have had their privacy invaded and have sustained injury, including injury to their peace of mind
21 and the loss of control over their personal information.

22 80. Plaintiff and Class members seek appropriate relief for those injuries, including but
23 not limited to restitution, disgorgement of profits earned by Defendant because of, by way of or in
24 connection with the intrusions upon Plaintiff's and Class members' privacy, nominal damages, and
25 all other equitable relief that will compensate Plaintiff and Class members properly for the harm to
26 their privacy interests.

27 81. Plaintiff also seek such other relief as the Court may deem just and proper.

28 //

FIFTH CAUSE OF ACTION
Violation of the Unfair Competition Law
Cal. Bus. & Prof. Code § 17200, *et seq.*
(On Behalf of Plaintiff and the Class)

82. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

83. California’s Unfair Competition Law (“UCL”) prohibits any “unlawful, unfair, or fraudulent business act or practice and unfair, deceptive, untrue or misleading advertising.” Cal. Bus. & Prof. Code § 17200.

84. Defendant engaged in unlawful business practices in connection with their unauthorized collection of Plaintiff’s and Class members’ private information, in violation of the UCL.

85. The acts, omissions, and conduct of Defendant as alleged herein constitute “business practices” within the meaning of the UCL.

86. Defendant violated the “unlawful” prong of the UCL by violating, inter alia, Plaintiff’s and Class members’ constitutional rights to privacy, state privacy statutes, and state consumer protection statutes.

87. Defendant’s acts, omissions, and conduct also violate the “unfair” prong of the UCL because those acts, omissions, and conduct, as alleged therein, offended public policy (including state privacy statutes and state consumer protection statutes) and constitute immoral, unethical, oppressive, and unscrupulous activities that caused substantial injury, including to Plaintiff and Class members.

88. The harm caused by Defendant’s conduct outweighs any potential benefits attributable to such conduct, and there were reasonably available alternatives to further Defendant’s legitimate business interests other than Defendant’s conduct described herein.

89. As result of Defendant’s violations of the UCL, Plaintiff and Class members have suffered injury in fact and lost money or property, including but not limited to valuable consideration, e.g., access to their private and personal data. Plaintiff’s and Class Members’ personal data, including web browsing and device data and personally identifying and addressing information has monetary value. Defendant deprived Plaintiff and Class members of that valuable

1 data without providing just compensation. Plaintiff and Class members would not have used certain
 2 websites had they known Defendant was disclosing their personally identifying and addressing
 3 information to third parties through those sites.

4 90. UCL § 17203 provides that the Court may restore to any person in interest any
 5 money or property which may have been acquired by means of unfair, deceptive, and fraudulent
 6 business acts and practices and may order restitution to Plaintiff. Plaintiff and Class members are
 7 entitled under UCL §§ 17203 and 17208 to restitution and restoration of all ill-gotten money and
 8 property belonging to Plaintiff and Class Members in Defendant's possession.

9 91. As a result of Defendant's violations of the UCL, Plaintiff and Class members are
 10 further entitled to injunctive relief enjoining Defendant's unlawful and unfair business activities and
 11 practices, including an injunction terminating all further distributions of Plaintiff's and Class
 12 members' personal data. This is particularly true since the dissemination of Plaintiff's and Class
 13 members' information is ongoing.

14 92. Plaintiff additionally seeks any and all other equitable relief that the Court deems just
 15 and proper.

16 **SIXTH CAUSE OF ACTION**
 17 **Common Law Invasion of Privacy – Intrusion Upon Seclusion**
 18 **(On Behalf of Plaintiff and the Class)**

19 93. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

20 94. To state a claim for intrusion upon seclusion, Plaintiff must establish that: (1) the
 21 defendant intruded on a place, conversation, or matter in which Plaintiff had a reasonable
 22 expectation of privacy; and (2) the intrusion would be highly offensive to a reasonable person.

23 95. Defendant's collection, interception, and use of Plaintiff's and Class members'
 24 personally identifiable information, including IP addresses, location information, and device
 25 identifiers constitutes an intentional intrusion. TripleLift's use of this information to create detailed
 26 profiles of individuals through its cookie syncing which tracks and profiles Plaintiff and Class
 27 Members across multiple unrelated websites, likewise constitutes an intentional intrusion.

28 96. Plaintiff and Class members reasonably expected that their IP addresses, location
 data, and other personal information would not be intercepted, collected, and used by TripleLift—a

1 third-party data broker with whom they have no direct relationship.

2 97. This expectation is particularly reasonable given that TripleLift operates entirely
3 behind the scenes, with no visible interface for users, no direct services provided to users, and no
4 opportunity for users to review or consent to TripleLift's privacy practices.

5 98. The information TripleLift collects is especially sensitive because it includes IP
6 addresses (which reveal users' geographic locations) and is used to create comprehensive profiles
7 tracking users' activities across multiple unrelated websites.

8 99. Plaintiff and Class members did not consent to, authorize, or understand TripleLift's
9 interception or use of their private data.

10 100. Defendant's conduct is highly offensive to a reasonable person because: (a) it
11 violates established social norms and expectations regarding online privacy; (b) it occurs without
12 users' knowledge or consent and provides no opportunity for users to opt out; (c) it creates
13 comprehensive profiles of users' online activities across multiple unrelated websites and across
14 devices through TripleLift's cross-device targeting technology; and (d) it monetizes users' personal
15 information for Defendant's commercial gain without their knowledge or compensation.

16 101. Defendant's conduct caused Plaintiff and Class members harm, including a violation
17 of their privacy interests, loss of control over their personal information, and emotional distress
18 from the knowledge that their online activities have been secretly monitored and profiled.

19 102. Plaintiff and Class members seek damages to compensate for the harm to their
20 privacy interests, among other damages, as well as disgorgement of profits made by Defendant as a
21 result of its intrusion upon seclusion.

22 103. Plaintiff and Class members are also entitled to punitive damages resulting from the
23 malicious, willful, and intentional nature of Defendant's actions, directed at injuring Plaintiff and
24 Class members in conscious disregard of their rights. Such damages are needed to deter Defendant
25 from engaging in such conduct in the future.

26 104. Plaintiff and Class members also seek any other relief the Court may deem just and
27 proper.
28

1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiff Sharon Manier, individually and on behalf of the Class, prays for
3 the following relief:

4 (a) An order certifying the Class as defined above, appointing Plaintiff as the
5 representative of the Class and appointing her counsel as Class Counsel;

6 (b) An order declaring that Defendant's actions, as set out above, violate Cal. Pen. Code
7 § 631, Cal. Penal Code § 638.51, Cal. Pen. Code § 502, and Art. 1, § 1 of the California
8 Constitution, Cal. Business & Professional Code § 17200, and constitute a common law invasion of
9 privacy.

10 (c) An injunction requiring Defendant to cease all unlawful activities;

11 (d) An award of statutory damages, disgorgement of profits, punitive damages, costs,
12 and attorneys' fees;

13 (e) Such other and further relief that the Court deems reasonable and just.

14 **JURY DEMAND**

15 Plaintiff requests a trial by jury of all claims that can be so tried.

16
17 Respectfully submitted,

18
19 Dated: November 25, 2025

20 By: /s/ James C. Shah
James C. Shah (SBN #260435)
Email: jcshah@millershah.com
Kolin C. Tang (SBN #279834)
Email: kctang@millershah.com
21 **MILLER SHAH LLP**
22 8730 Wilshire Blvd., Suite 400
23 Los Angeles, CA 90211
24 Telephone: (866) 540-5505
Facsimile: (866) 300-7367

25 Kyle Shamberg (*pro hac vice* forthcoming)
26 **CARROLL SHAMBERG, LLC**
27 111 W. Washington Street, Suite 1240
Chicago, IL 60602
28 kyle@csclassactions.com
(872) 215-6205

DON BIVENS PLLC

Don Bivens (*pro hac vice* forthcoming)

15169 N. Scottsdale Road, Suite 205

Scottsdale, AZ 85254

Telephone: (602) 762-2661

don@donbivens.com

Counsel for Plaintiff and the Proposed Class

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Exhibit B

From: [Thompson, Anna M. \(SEA\)](#)
To: [Kyle Shamberg](#); jcshah@millershah.com; don@donbivens.com; [Kolin Tang](#)
Cc: [Menaldo, Nicola C. \(SEA\)](#)
Subject: Manier v. Triple Lift, Inc., CVRI2505643 - acceptance of service
Date: Monday, December 1, 2025 3:42:14 PM

Counsel, thank you for sending via email today the court-stamped copy of the amended complaint in the above captioned matter. This email is to formally accept service on behalf of Triple Lift, Inc.

Best,

Anna Mouw Thompson
PARTNER

Perkins Coie

1301 Second Avenue Suite 4200
Seattle, WA 98101-3804
[+1.206.359.3327](tel:+12063593327)
AnnaThompson@perkinscoie.com
perkinscoie.com

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Class Action Lawsuit Claims TripleLift Secretly Collects Consumer Data Online](#)
