



**IN THE COMPETITION**  
**APPEAL TRIBUNAL**

Case No: 1640/7/7/24

BETWEEN:

**VICKI SHOTBOLT CLASS REPRESENTATIVE LIMITED**

Class Representative

- v -

**VALVE CORPORATION**

Defendant

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**COLLECTIVE PROCEEDINGS ORDER**

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**UPON** the Class Representative’s application for a collective proceedings order (the “**CPO Application**”) pursuant to section 47B of the Competition Act 1998 (the “**Act**”) and Rule 75 of the Competition Appeal Tribunal Rules 2015 (S.I. No. 1648 of 2015) (the “**Tribunal Rules**”)

**AND UPON** receipt of a “**Collective Proceedings Claim Form**” dated 4 June 2024, which combines claims in respect of losses alleged to have been caused by the Defendant’s unlawful conduct in breach of the prohibition in Chapter II of the Act and Article 102 of the Treaty on the Functioning of the European Union (the proposed “**Collective Proceedings**”)

**AND UPON** receipt of a Draft Amended Collective Proceedings Claim Form on 16 September 2025, amending the proposed class definition

**AND UPON** hearing counsel for all parties at the certification hearing on 14 October 2025

**AND UPON** the Class Representative agreeing to:

1. Appoint a senior lawyer to its Advisory Panel with the specific role of promoting the interests of class members who are minors;

2. Provide quarterly periodic reports on communications with class members which summarise the communications sent and the level of engagement with those communications;
3. Update the Tribunal every 3 months in relation to its expenditure on the Collective Proceedings against the amounts in the budget for the Collective Proceedings; and
4. Only permit its legal representatives to submit requests of funding/payment from its funder after that request has been reviewed and approved by an appropriate cost counsel or cost draughtsman.

**AND UPON** the Class Representative providing evidence (a) recording the steps taken to secure funding for the Collective Proceedings; and (b) confirming that it was confident that those funding arrangements were appropriate in their terms, in the light of market conditions, and in the interests of members of the class

**AND UPON** correspondence between the Tribunal and parties following the certification hearing, in the course of which the Class Representative proposed further amendments to the proposed class definition

**AND UPON** the Tribunal's CPO judgment of 26 January 2026 in which it held that: (i) in accordance with Rule 78 of the Tribunal Rules that it would be just and reasonable for the Class Representative to act as a class representative in the Collective Proceedings; and (ii) in accordance with Rule 79 of the Tribunal Rules that the claims as described in the Application are eligible for inclusion in collective proceedings

**IT IS ORDERED THAT:**

**Authorisation of Class Representative**

1. Pursuant to section 47B of the Act and Rules 77 and 80 of the Tribunal Rules, Vicki Shotbolt Class Representative Limited is authorised to act as the Class Representative and to continue the Collective Proceedings on an opt-out basis claiming damages for loss suffered by members of the Class (as defined below).
2. The remedy sought is an award of aggregate damages pursuant to section 47C(2) of the Act together with interest, costs and/or such further or other relief as the Tribunal may see fit to provide.
3. The Class Representative's address for service is c/o Milberg London LLP, Third Floor, Sutton Yard, 65 Goswell Road, London, EC1V 7EN.

**Class Definition**

4. **"The Class"** is defined as follows (**"Class Definition"**):

“All Persons who, during the Class Period, made one or more payments to purchase (“**Purchasers**”): (a) PC Games, and/or (b) Add-on Content for PC Games, including subscription payments for PC Games and/or Add-on Content (collectively “**Relevant Purchases**”).

5. For the purposes of the Class Definition:

- (a) “**Persons**” are end-consumers, and do not include resellers or other non-retail customers. Persons include, in particular, people who purchase PC Games and/or Add-on Content for use by themselves or by people they know (such as friends or family members).
- (b) “**Purchasers**” include, for the avoidance of doubt: (a) where the payment was taken from a bank or credit card at the time of purchase (whether through the submission of card details or the use of digital wallet technologies such as Apple Pay, Google Pay or Paypal etc.), the person whose account the money was taken from; (b) where the payment was made with pre-loaded funds on a user account (e.g. Steam Wallet, Epic Wallet etc.), the user account holder; and (c) where the payment was made using a monetary gift card or voucher, the person who made the payment using that card or voucher.
- (c) “**Class Period**” means the period: (i) from 4 June 2018 to 4 June 2024, in relation to members of the Class domiciled in England, Wales and Northern Ireland; and (ii) from 1 January 2010 to 4 June 2024 in relation to members of the Class domiciled in Scotland.
- (d) “**PC Games**” means video games designed to be played on PCs (i.e. personal computers), as opposed to on other types of hardware such as consoles or mobiles, including PCs built by Apple and/or using a Mac operating system.
- (e) “**Add-on Content**” means content that can be added-on to PC Games that is purchased after the initial acquisition of the game, sometimes referred to as Downloadable Content (“DLC”), and includes content acquired through Microtransactions completed during gameplay.

6. The following Persons are excluded from the Class:

- (a) Any directors of the Class Representative, their parents, their spouses or civil partners or any persons with whom they cohabit, and their children.
  - (b) Officers, directors or employees of the Defendant, their subsidiaries and any entity in which they have a controlling interest.
  - (c) All members of the Class Representative's and Defendant's respective legal teams and all experts and professional advisors instructed and retained by them, and all funders or insurers involved, in connection with these Collective Proceedings.
  - (d) All members of the Tribunal assigned to these proceedings.
  - (e) Any judge involved in any appeal in the present Collective Proceedings (whether in respect of the grant of permission to appeal or the hearing of any substantive appeal).
7. In respect of any Person who meets the Class Definition but has subsequently died, the Class shall include their lawful representatives, successors or assignees.

### **Forum**

8. The Collective Proceedings shall be treated as taking place in England and Wales.

### **Notification**

9. The Class Representative shall publish a Notice of the Collective Proceedings (the "**Notice**") in the form attached to this Order, in accordance with Rule 81 of the Tribunal Rules.

### **Opting-out and Opting-in**

10. Every member of the Class who is domiciled within the United Kingdom on 11 March 2026 (the "**Domicile Date**") shall be included in these Collective Proceedings.
11. Any member of the Class who is domiciled in the United Kingdom on the Domicile Date may opt-out of the Collective Proceedings by giving the Class Representative notice in writing of their decision to opt out by 11 June 2026, in accordance with the Notice.

12. Every member of the Class who is not domiciled in the United Kingdom on the Domicile Date may opt-in to the Collective Proceedings by giving the Class Representative notice in writing of their decision to opt-in by 11 June 2026, in accordance with the Notice.

### **Pleadings**

13. By 4pm on 24 February 2026, the Class Representative shall provide the Defendant with a draft Amended Collective Proceedings Claim Form that makes appropriate amendments to reflect the fact that the proceedings have been certified.
14. By 4pm on 26 February 2026, the Defendant shall confirm whether it consents to the proposed amendments.
15. If the Defendant has consented to the proposed amendments pursuant to paragraph 14, by 4pm on 27 February 2026, the Class Representative shall file and serve an Amended Collective Proceedings Claim Form in the form provided to the Defendant pursuant to paragraph 13.
16. By 4pm on 10 April 2026, the Defendant shall file and serve their Defence to the Amended Collective Proceedings Claim Form.
17. By 4pm on 15 May 2026, the Class Representative shall file and serve a Reply to the Defence (if so advised).

### **General**

18. There be liberty to apply.

**The Honourable Mr Justice Hildyard**  
Chair of the Competition Appeal Tribunal

Made: 11 March 2026  
Drawn: 11 March 2026