

EXHIBIT 1

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13 UNITED STATES DISTRICT COURT
 14 CENTRAL DISTRICT OF CALIFORNIA

16 U.S. EQUAL EMPLOYMENT
 17 OPPORTUNITY COMMISSION,

18 Plaintiff,

19 vs.

20 ACTIVISION BLIZZARD, INC.,
 21 BLIZZARD ENTERTAINMENT,
 22 INC., ACTIVISION PUBLISHING,
 23 INC., and KING.COM, INC.,
 24 inclusive,

24 Defendants.

CASE NO. 2:21-CV-07682 DSF-JEM
[PROPOSED] CONSENT DECREE

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21 ENTERTAINMENT, INC., ACTIVISION
22 PUBLISHING, INC., and KING.COM, INC.
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1 Plaintiff U.S. Equal Employment Opportunity Commission (the “EEOC”)
2 and Activision Blizzard, Inc. (“Activision Blizzard”), Activision Publishing, Inc.
3 (“Activision Publishing”), Blizzard Entertainment, Inc. (“Blizzard”), and King.com,
4 Inc. (“King”) (collectively, and including their respective subsidiaries with
5 employees in the United States, “Defendants”), collectively referred to as “the
6 Parties,” hereby stipulate and agree to entry of this Consent Decree (the “Decree”)
7 to fully and finally resolve any allegations contained in the Complaint filed by the
8 EEOC in *EEOC v. Activision Blizzard, Inc., et al.*, with Case No. 2:21-CV-07682
9 DSF-JEM (“Action”).

10 **I. RECITALS AND BACKGROUND**

11 Plaintiff filed this Action in the United States District Court, Central District
12 of California, for violation of Title VII of the Civil Rights Act of 1964 (“Title
13 VII”); in *EEOC v. Activision, et al.*, with Case No. 2:21-CV-07682 DSF-JEM (the
14 “Action”). The Action alleges that Defendants engaged in unlawful employment
15 practices by subjecting employees, individuals, or a group of individuals to sexual
16 harassment, pregnancy discrimination and/or related retaliation in violation of
17 Sections 703(a) and 704(a) of Title VII 2000e-2(a), 2000e-3(a).

18 Activision Publishing and its related subsidiaries and companies with
19 employees in the United States, Blizzard and its related subsidiaries and companies
20 with employees in the United States, and King and its related subsidiaries and
21 companies with employees in the United States, are wholly owned subsidiaries of
22 Activision Blizzard. Since 2016 and through the present, Activision Publishing,
23 Blizzard, and King maintained separate workforces in distinct office locations.
24 Blizzard also maintained human resources and personnel functions separate from
25 those of Activision Blizzard and Activision Publishing until August 2019. Prior to
26 his departure in late 2018, Blizzard’s Chief Executive Officer was co-founder
27 Michael Morhaime.
28

1 Defendants expressly deny that they subjected any individual or group of
2 individuals to sexual harassment, pregnancy discrimination and/or related
3 retaliation, deny all allegations of wrongdoing, liability, damages and entitlement to
4 other relief set forth in the Action whether arising under Title VII or analogous state
5 and local laws, deny any group or systemic discrimination or harassment, and deny
6 that any of their policies and procedures are inadequate. However, the Parties
7 recognize that through this Decree the Parties can avoid the expense, distraction and
8 possible litigation associated with such a dispute and thus the Parties wish to
9 resolve all issues through this Decree.

10 **II. PURPOSES AND SCOPE OF THE DECREE**

11 In the interest of resolving this matter, the Parties have agreed that this
12 Action should be finally settled by entry of this Decree, and all claims, including
13 those arising out of any of the same factual predicates as those implicated by the
14 Action, will be fully and completely resolved by this Decree. This Decree shall be
15 binding on and enforceable against Defendants, as well as their parents,
16 subsidiaries, officers, directors, agents, successors, and assigns. The scope of this
17 Decree includes all United States operations and United States-based employees of
18 all Defendants, unless otherwise indicated.

19 The Parties have entered into this Decree for the following purposes:

- 20 A. To provide appropriate monetary and injunctive relief;
- 21 B. To ensure that Defendants' employment practices comply with
- 22 pertinent laws regarding sexual harassment, pregnancy discrimination
- 23 and related retaliation throughout the Decree term;
- 24 C. To ensure that Defendants maintain workplaces free of sexual
- 25 harassment, pregnancy discrimination and related retaliation
- 26 throughout the Decree term;
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