

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE GOOGLE PLAY STORE ANTITRUST LITIGATION	Case No. 3:20-cv-05792-JD  <b>DECLARATION OF STEVEN PLATT OF ANGEION GROUP REGARDING NOTICE IMPLEMENTATION AND DISTRIBUTION PLAN</b>
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I, Steven Platt, declare under penalty of perjury as follows:

1. I am a project manager at the class action notice and claims administration firm Angeion Group, LLC (“Angeion”), located at 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein, and if called as a witness, could and would testify competently thereto.
2. Angeion was appointed by this Court to serve as Settlement Administrator and to, among other tasks, provide notice to potential Settlement Class Members; respond to Settlement Class Member inquiries; receive and process Payment Selection Forms; distribute settlement award payments and perform other duties as specified in the Amended Settlement Agreement (“Settlement Agreement”) and by the directives of the Court, including but not limited to the Court’s *Order Re Developer Plaintiffs’ Preliminary Approval* entered on December 12, 2022 (Dkt. No. 233) (the “Preliminary Approval Order”).
3. The purpose of this declaration is to provide the Court with an update on the work performed by Angeion related to the implementation of the Notice Plan and administrative tasks following the Court’s Preliminary Approval Order.

#### **OVERVIEW OF THE NOTICE PLAN**

4. The initial Notice Plan provided for individual direct Summary Notice to all reasonably identifiable Settlement Class Members via email and mail, combined with a media campaign, supplemental notice by Google through the Google Play Console, and the implementation of a dedicated website and toll-free telephone line where Settlement Class Members can learn more about their rights and options pursuant to the terms of the Settlement.

#### **CAFA NOTICE**

5. On June 30, 2022, Plaintiffs filed the *Developer Plaintiffs’ Motion for Preliminary Settlement Approval* with Google Inc., (Dkt. No. 218) with the United States District Court for the Northern District of California, seeking preliminary approval of the Proposed Settlement. The motion included a copy of the Settlement Agreement, which triggered the notice provisions of 28 U.S.C. § 1715.

6. Seven days later, on July 7, 2022, Angeion served notice of the Proposed Settlement on the attorneys general of all U.S. states and territories, as well as the Attorney General of the United States, pursuant to 28 U.S.C. § 1715(b), via U.S. mail and FedEx (“CAFA Notices”). Attached hereto as **Exhibit A** is a copy of the CAFA Notice.

7. On October 12, 2022, Plaintiffs filed the *Developer Plaintiffs’ Renewed Motion for Preliminary Settlement Approval* with Google Inc., (Dkt. No. 229) with the United States District Court for the Northern District of California, seeking preliminary approval of the Proposed Settlement. The motion included a copy of the Amended Settlement Agreement, which triggered the notice provisions of 28 U.S.C. § 1715.

8. Seven days later, on October 19, 2022, Angeion served notice of the Proposed Settlement on the attorneys general of all U.S. states and territories, as well as the Attorney General of the United States, pursuant to 28 U.S.C. § 1715(b), via U.S. mail and FedEx (“Supplemental CAFA Notices”). Attached hereto as **Exhibit B** is a copy of the Supplemental CAFA Notice.

**THE CLASS MEMBER LIST**

9. On December 2, 2022, Angeion received a list of 47,972 eligible Developer Accounts from Plaintiffs which, for each Developer Account, consisted of the account identification number (known as “GAIA\_ID”), service fees paid for class transactions during the class period, and allocated portion of the settlement fund.

10. On December 16, 2022, Angeion received a list of 47,972 eligible Developer Accounts from Defendants which consisted of the contact information for 48,269 account owners and representatives for the 47,972 eligible Developer Accounts.

11. Angeion combined the two lists and compiled the Class Member List. In summary, the Class List is comprised of 47,972 application Developer Accounts, the service fees paid for class transactions by each Developer Account, 48,269 account owners and authorized representatives along with their email addresses, mailing addresses and phone numbers.

12. Angeion analyzed the Class Member List and identified 6 Developer Accounts that had more than one account owner and 269 account owners with more than one Developer Account. Angeion

reviewed the 6 Developer Accounts that had more than one account owner, consulted with Counsel, and proportionally split these 6 Developer Accounts into 13 separate sub-accounts pertaining to each account owner and including the service fees paid by each account owner for their Developer Account class transactions. Angeion examined the developer accounts owned by each of the 269 account owners and verified that each account owner's total service fees for all Developer Accounts owned, did not exceed the \$2 million eligibility threshold and were eligible participants.

13. Pursuant to the terms of the Amended Settlement Agreement and Release, the Settlement Fund will be distributed to all Settlement Class Members who did not submit timely and valid request for exclusion ("Opt-Out"). The Net Settlement Fund will be distributed to Settlement Class Members based pro rata on the total amount of service fees each Settlement Class Member paid to Google at a level above 15%, during the relevant period from August 17, 2016, and December 31, 2021, with a minimum payment of \$250. *See* Dkt. No. 229-1, Ex. B; Amended Settlement Agreement at § 6.

#### **SETTLEMENT WEBSITE**

14. On January 15, 2023, Angeion established the following website devoted to this settlement: [www.GooglePlayDeveloperSettlement.com](http://www.GooglePlayDeveloperSettlement.com). The settlement website contains general information about the Settlement, court documents, an online payment selection portal, a downloadable Payment Selection Form, a downloadable, searchable Long-Form Notice, a list of frequently asked questions and answers, important dates and deadlines pertinent to this Settlement and the functionality to provide each potential Settlement Class Members' estimated Minimum Potential Payment. Settlement Class Members can send an email to a dedicated email address, [info@GooglePlayDeveloperSettlement.com](mailto:info@GooglePlayDeveloperSettlement.com), with questions pertaining to the Settlement.

15. As of April 19, 2023, the Settlement Website has received 107,118 page views from 43,358 unique users.

#### **TOLL-FREE HOTLINE**

16. On January 29, 2023, Angeion established the following toll-free hotline dedicated to this case: 1-844-423-3488. The toll-free hotline utilizes an interactive voice response ("IVR") system to provide Settlement Class Members with responses to frequently asked questions and inform

Settlement Class Members of important dates and deadlines pertaining to the Settlement. The toll-free hotline is accessible 24 hours a day, 7 days a week. Settlement Class Members also have the ability to leave a message requesting a Claim Form and/or Long Form Notice via the toll-free hotline. As of April 19, 2023, the toll-free hotline has received 417 calls, totaling 1,797 minutes.

**DIRECT EMAIL SUMMARY NOTICE**

17. Angeion utilizes a network of data partners to aggregate a combination of first and third-party data to source, update and verify contact information. Through this network Angeion validated 45,703 email addresses pertaining to the account owners and authorized representatives for 45,392 (94.6%) of the 47,972 eligible Developer Accounts included on the Class Member List.

18. Angeion designed the email notice to avoid many common “red flags” that might otherwise cause a potential Settlement Class Member’s spam filter to block or identify the email notice as spam. For instance, Angeion does not include attachments to the email notice because attachments are often interpreted by various Internet Service Providers (“ISP”) as spam. Rather, in accordance with industry best practices, Angeion includes a link to all operative documents so that Settlement Class Members can easily access this information.

19. Angeion employed additional methods to help ensure that as many Settlement Class Members as possible receive notice via email. Specifically, prior to distributing email notice, Angeion utilized an email updating process to help ensure the accuracy of recipient email addresses. Angeion also reviewed email addresses for mis-transcribed characters and performs other hygiene, as appropriate.

20. On January 30, 2023, Angeion commenced the dissemination of the Summary Email Notice (“Initial Email Notice”) to the 45,703 validated email addresses included on the Class List. Angeion accounted for the reality that some emails will inevitably fail to be delivered during the initial delivery attempt. Therefore, after the initial noticing campaign was complete, Angeion, after an approximate 24-72-hour rest period, which allows any temporary block at the ISP level to expire, caused a second round of email noticing to continue to any email addresses that were previously

identified as soft bounces and not delivered. In our experience, this minimizes emails that may have erroneously failed to deliver due to sensitive servers and optimizes delivery.

21. Upon the completion of the second round of email notice transmissions, the Initial Email Notice was successfully delivered to 44,862 (98.2%) email addresses and 841 (1.8%) were not successfully delivered. These 44,862 successfully delivered Initial Email Notices pertained to 44,561 (92.9%) of the 47,972 eligible Developer Accounts. A copy of the Class Summary Email Notice is attached hereto as **Exhibit C**.

### **DIRECT MAIL SUMMARY NOTICE**

22. Prior to mailing the direct mail Summary Postcard Notice (“Postcard Notice”), Angeion processed the 48,269 mailing addresses contained in the Class Member List through the United States Postal Service (“USPS”) National Change of Address (“NCOA”) database and Coding Accuracy Support System (“CASS”) to validate the mailing addresses and identify updated address information for class members who moved in the last four years and filed a change of address request with the USPS. Through these efforts, Angeion identified 984 invalid mailing addresses and obtained 5,065 updated addresses for Class Members. In summary, the Class Member List contained 47,285 mailing addresses, which pertained to 47,054 (98.1%) of the 47,972 eligible Developer Accounts.

23. On January 30, 2023, Angeion commenced the mailing of the Summary Postcard Notice (“Postcard Notice”) to all 47,285 mailing addresses included on the Class List, via United States Postal Service (“USPS”) first-class mail, postage prepaid. Attached hereto as **Exhibit D** is a copy of the Postcard Notice.

24. As of April 19, 2023, the USPS has returned 9,345 of the Postcard Notices initially mailed as undeliverable. Postcard Notices returned as undeliverable by the USPS without a forwarding address were processed through address verification searches and re-mailed to the updated addresses located through this process. Postcard Notices returned as undeliverable by the USPS with a forwarding address were re-mailed to the forwarding address identified by the USPS. As a result of the above-described efforts, a total of 6,196 Notices have been re-mailed.

25. As of April 19, 2023, the USPS has returned 949 re-mailed Postcard Notices as undeliverable.

26. In summary, the direct mailing efforts described in paragraphs 22-25, resulted in a presumed Postcard Notice delivery rate of 91.3%<sup>1</sup> for all postcards mailed and a Postcard Notice delivery rate of 91.1% for all eligible Developer Accounts%.

**REMINDER EMAIL SUMMARY NOTICE**

27. On March 13, 2023, Angeion commenced the dissemination of the Initial Reminder Summary Email Notice to 41,367 valid email addresses included in the Class Member List for which a neither a Payment Selection Form nor an Exclusion Request had been submitted. The Initial Reminder Summary Email Notice was successfully delivered to 40,215 (97.2%) email addresses and 1,152 (2.8%) were not successfully delivered. A copy of the Initial Reminder Summary Email Notice is attached hereto as **Exhibit E**.

**REMINDER DIRECT MAIL SUMMARY NOTICE**

28. On March 30, 2023, Angeion commenced the mailing of the Reminder Summary Postcard Notice to 41,693 Class Member addresses included on the Class List for which Angeion had not received a Payment Selection Form from, via USPS first-class mail, postage prepaid. A copy of the Reminder Summary Postcard Notice is attached hereto as **Exhibit F**.

**PRESS RELEASES**

29. On January 31, 2023, Angeion caused the initial publication of a press release via Business Wire. Attached hereto as **Exhibit G**, is a copy of the initial press release.

30. On May 15, 2023, Angeion intends to cause a second publication of a reminder press release via Business Wire.

**APPLICATION DEVELOPER OUTREACH**

31. Pursuant to the terms of the Settlement, Angeion was to use reasonable efforts to contact Settlement Class Members projected to receive more than \$20,000 from the settlement fund to confirm class membership, contact information and payment instructions. Angeion identified 532 Developer Accounts that were projected to receive more than \$20,000 from the settlement fund.

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<sup>1</sup> Angeion may receive additional Summary Postcard Notices returned by the USPS as undeliverable, which would cause the presumed delivery rate and count of successful Notice deliveries to be reduced. Based on Angeion's experience, Angeion does not anticipate any additional undeliverable notices to materially change the presumed delivery rate.

32. The Settlement Class Member List contained 187 telephone numbers pertaining to these 532 Developer Accounts projected to receive more than \$20,000 from the settlement fund. Angeion performed phone number searches to obtain phone numbers for these 532 accounts. Through these efforts, Angeion successfully obtained 78 additional phone numbers, which were added to the Settlement Class Member list and outbound calling campaign. In total, Angeion obtained 265 telephone numbers for Developer Accounts projected to receive more than \$20,000.

33. On February 27, 2023, Angeion commenced an outbound calling campaign to the 265 telephone numbers contained in the Class Member List, pertaining to application developer accounts estimated to receive more than \$20,000 settlement payment.

34. As of April 19, 2023, Angeion attempted 855 telephone calls to these 265 account owners or authorized representatives associated with eligible application developer accounts. Of these 855 attempted telephone calls, Angeion successfully confirmed class membership, contact information and payment instructions for 14 application Developer Accounts. Angeion continues its efforts to contact and obtain confirmation and payment instructions from these developers.

#### **PROGRAMMATIC AD DISPLAYS**

35. On January 30, 2023, Angeion commenced a form of internet advertising known as Programmatic Display Advertising, which is the leading method of buying digital advertisements in the United States. Programmatic Display Advertising is a trusted method specifically utilized to reach defined target audiences. Programmatic advertising is a method of advertising where an algorithm identifies and examines demographic profiles and uses advanced technology to place advertisements on the websites where members of the audience are most likely to visit (these websites are accessible on computers, mobile phones and tablets). Angeion designed the programmatic display advertising targeted to “Developers who build apps for Google Play.”

36. To combat the possibility of non-human viewership of the digital advertisements and to verify effective unique placements, Angeion employed Oracle’s BlueKai, Adobe’s Audience Manger and/or Lotame, which are demand management platforms (“DMP”). DMPs allowed Angeion to learn more about the online audiences that are being reached. Further, online ad verification and security



providers such as Comscore Content Activation, DoubleVerify, Grapeshot, Peer39 and Moat were deployed to provide a higher quality of service to ad performance. Attached hereto as **Exhibit H**, are copies of the programmatic ad displays.

#### **SOCIAL MEDIA NOTICE**

37. On January 30, 2023, Angeion commenced social media notice campaign utilizing Twitter, Facebook, and Instagram, which are some of the leading social media platforms in North America. The social media campaign used an interest-based approach which focuses on the interests that users exhibit while on the social media platforms. The social media campaign engaged the audience via a mix of news feed and story units to optimize performance, i.e., via the Facebook desktop site, mobile site and mobile app. Facebook image ads will appear natively in desktop newsfeeds (on Facebook.com) and mobile app newsfeeds (via the Facebook app or Facebook.com mobile site), and on desktops via right-column ads. Specific tactics were implemented to further qualify and deliver impressions to the Settlement Class. Content Targeting was utilized to target ads to relevant sites within the technology vertical. Audience Targeting allowed the use of demographic and behavioral data to serve ads. Based on these characteristics, Angeion built different consumer profile segments to ensure the notice plan messaging was delivered to the proper audience. The social media ads ran nationwide, with a weighted delivery based on where conversion activity was occurring. Attached hereto as **Exhibit I**, are copies of the social media ads.

#### **SEARCH ENGINE MARKETING**

38. On January 30, 2023, Angeion commenced a paid search campaign on Google to help drive Settlement Class Members who are actively searching for information about the Settlement to the dedicated Settlement Website. Paid search ads were purchased to complement the programmatic and social media campaigns, as search engines are frequently used to locate a specific website, rather than a person typing in the URL. Search terms related to not only the Settlement itself but also the subject-matter of the litigation. In other words, the paid search ads were driven by the individual user's search activity, such that if that individual searches for (or had recently searched for) the

Settlement, litigation or other terms related to the Settlement, that individual could be served with an advertisement directing them to the Settlement Website.

39. The comprehensive media notice outlined above in paragraphs 35-38 was designed to deliver an estimated 1.5 million impressions. Upon the completion of the media notice, Angeion served a total 1,605,281 impressions.

#### **CONSOLE NOTICE**

40. The notice plan contemplated that Google would send supplemental notice to class members via the “console” that developers access to manage their Google Play apps. That console message would also trigger a corresponding email to class members. Counsel for Google has indicated that this supplemental console notice was provided on February 24, 2023. Specifically, counsel for Google has indicated that Google provided a console message and corresponding email to 40,420 accounts that are potential members of the settlement class. Counsel indicated that 7,525 additional accounts no longer have console access (e.g. because the account was terminated for a policy violation). Counsel indicated that those 7,525 accounts were sent the email described above but would not have received a console message. Finally, counsel has indicated that this supplemental notice could not be provided to 31 accounts because there is no longer a developer associated with the account (e.g. because the developer may have deleted its developer account). The text of Google’s console notice and corresponding email is attached hereto as **Exhibit J**.

#### **PAYMENT SELECTION FORM SUBMISSIONS**

41. The deadline for Settlement Class Members to submit a Payment Selection Form is May 30, 2023. As of April 19, 2023, Angeion had received a total of 6,935 Payment Selection Form submissions for eligible Developer Accounts and 741 submissions that are under review for eligibility. As contemplated by the distribution plan, addressed further below, Settlement Class Members who did not submit a Payment Selection Form are entitled to receive a physical check with their settlement proceeds.

**REQUEST FOR EXCLUSION**

42. The deadline for Settlement Class Members to request exclusion from the settlement was April 5, 2023. As of April 19, 2023, Angeion has received 7 valid requests for exclusion for eligible Developer Accounts. These 7 valid exclusion requests represent 0.015% of all eligible Developer Accounts and less than 0.005% of the total Settlement Class Proceeds. Attached hereto as **Exhibit K**, is a list of the valid exclusion requests.

**OBJECTIONS TO THE SETTLEMENT**

43. The deadline for Settlement Class Members to submit Objections to the settlement was April 5, 2023. As of the date of this Declaration, Angeion has not received any objections to the settlement.

44. Angeion understands that, at the request of Plaintiffs' Counsel, the deadline to object to Plaintiffs' Counsel's Fee and Cost Motion was extended until May 8, 2023. As of the date of this Declaration, Angeion has not received any objections to the Fee and Cost Motion.

45. We understand that a member of the Settlement Class named Grace Tang has been granted leave to appear and address the Court at the final approval hearing. Ms. Tang did not file an objection to the Settlement, nor has she submitted a request for exclusion. Ms. Tang submitted a Payment Selection Form requesting a digital payment from the Settlement fund.

**PLAN FOR DISTRIBUTION**

46. If the Settlement receives final approval, Angeion will distribute Settlement proceeds to Class Members in accordance with the Distribution Plan proposed at preliminary approval. Specifically, Angeion will issue digital payments via PayPal, Venmo or virtual prepaid electronic Mastercard to the Settlement Class Members who submitted a Payment Selection Form, elected a digital payment and verified membership in the Settlement Class. Additionally, Angeion will issue settlement checks to Settlement Class Members who did not submit a Payment Selection Form.

47. Angeion has received a tax opinion that these settlement payments will be deemed reportable income by the Internal Revenue Service and should be reported on an IRS Form 1099-NEC. Angeion has requested that the Defendant provide Angeion with the tax identification numbers of each eligible Settlement Class Member, for tax reporting and address verification.

48. Angeion intends to utilize the tax identification numbers to supplement the previous Settlement Class data and obtain any updated contact information for further outreach and to ensure settlement checks are properly delivered to the Settlement Class Members.

49. Angeion will distribute the Settlement Fund in accordance with the terms stipulated in the Settlement Agreement. *See* Dkt. No. 229-1; Amended Settlement Agreement at § 6.

### CONCLUSION

50. The comprehensive Notice Plan outlined above was successful in reaching virtually all Settlement Class Members. The Notice Plain included direct mailed summary notice with a presumed delivery rate of 91.1%, direct emailed summary notice with a successful delivery rate of 92.9%, a console notice, and a multi-faceted media notice program including programmatic media, social media, search engine marketing and active listening that delivered over 100% of the targeted impressions. Angeion further analyzed the comprehensive results of the direct mail and direct mail notices and determined that only 348 Developer Accounts did not result in either a presumed delivered direct mail notice or successfully delivered direct email notice. Therefore, 47,624 (99.3%) of the 47,972 eligible Developer Accounts are presumed to have received direct notice through mail and email, which does not take into consideration the console notice or media program. These are excellent results in my experience, particularly in light of the low rate of opt outs (with only 0.015% of Settlement Class Members requesting exclusion) and absence of objections to the Settlement.

I hereby declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: May 3, 2023

  
STEVEN PLATT

# **EXHIBIT A**



1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
(p) 215-563-4116  
(f) 215-563-8839  
www.angeiongroup.com

July 7, 2022

VIA USPS PRIORITY MAIL

United States Attorney General &  
Appropriate Officials

**Re: Notice of Class Action Settlement**

*In re Google Play Developer Antitrust Litigation*  
Case No. 3:20-cv-05792-JD (N.D. Cal.)

Dear Counsel or Official:

Angeion Group, an independent claims administrator, on behalf of the defendant in the action described below, hereby provides your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of the following proposed class action settlement:

**Case Name:** *In re Google Play Developer Antitrust Litigation*

**Index Number:** 3:20-cv-05792-JD

**Jurisdiction:** United States District Court for the Northern District of California, San Francisco Division

**Date Motion for Preliminary Approval Was Filed:** June 30, 2022

In accordance with the requirements of 28 U.S.C. § 1715, we hereby provide the following information, and copies of the documents described below associated with this action on the enclosed CD-ROM:

1. **28 U.S.C. § 1715(b)(1)-Complaint:** A copy each of the following are enclosed on the CD-ROM:
  - a. Class Action Complaint; Complaint for Violation of the Sherman Act and California Unfair Competition Law, Dkt. 1, *Pure Sweat Basketball, Inc. v. Google LLC*, No. 3:20-cv-05792-JD (N.D. Cal. Aug. 17, 2020).
  - b. First Consolidated Class Action Complaint for Violation of the Sherman and Clayton Acts (15 U.S.C. §§ 1, 2, 3, 15, 26), Cartwright Act (Cal. Bus. & Prof. Code §§ 16700 et seq.) and Unfair Competition Law (Cal. Bus. & Prof. Code §§ 17200 et seq.), Dkt. 56, *Pure Sweat Basketball, Inc. v. Google LLC*, No. 3:20-cv-05792-JD (N.D. Cal. Oct. 21, 2020).
  - c. First Amended Consolidated Class Action Complaint for Violation of the Sherman and Clayton Acts (15 U.S.C. §§ 1, 2, 3, 15, 26), Cartwright Act (Cal. Bus. & Prof. Code §§ 16700 et seq.) and Unfair Competition Law (Cal. Bus. & Prof. Code §§ 17200 et seq.), *In re Google Play Developer Antitrust Litigation*, Dkt. 141, No. 3:20-cv-05792-JD (N.D. Cal. Aug. 30, 2021).

- d. Second Amended Consolidated Class Action Complaint for Violation of the Sherman and Clayton Acts (15 U.S.C. §§ 1, 2, 3, 15, 26), Cartwright Act (Cal. Bus. & Prof. Code §§ 16700 et seq.) and Unfair Competition Law (Cal. Bus. & Prof. Code §§ 17200 et seq.), Dkt. 179, *In re Google Play Developer Antitrust Litigation*, No. 3:20-cv-05792-JD (N.D. Cal. Jan. 21, 2022).
2. **28 U.S.C. § 1715(b)(2)-Notice of Any Scheduled Judicial Hearings:** The hearing on the class plaintiffs' motion for preliminary approval of the settlement is currently scheduled to occur at 10:00 a.m. on August 4, 2022. No other judicial hearings relating to the settlement are scheduled.
3. **28 U.S.C. § 1715(b)(3)-Notification to Class Members:** Copies of the proposed Claim Form, Email Notice, Postcard Notice, and Long-Form Notice, all filed with the Court on June 30, 2022, are included on the enclosed CD-ROM. If the Court preliminarily approves the Settlement, information about the settlement will be available on the following website, which will be provided to class members in the proposed Notice documents described above: [www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com).
4. **28 U.S.C. § 1715(b)(4)-Class Action Settlement Agreement:** The Settlement Agreement and Release, filed with the Court on June 30, 2022, is included on the enclosed CD-ROM.
5. **28 U.S.C. § 1715(b)(5)-Any Settlement or Other Agreements:** There are no other settlements or other agreements that have been contemporaneously made between class counsel and counsel for the defendant.
6. **28 U.S.C. § 1715(b)(6)-Final Judgment:** As of the date of this letter, no final judgment or notice of dismissal has been entered in this case. A copy of the Proposed Order Regarding Developer Plaintiffs' Motion for Preliminary Settlement Approval, filed with the Court on June 30, 2022, is included on the enclosed CD-ROM.
7. **28 U.S.C. § 1715(b)(7)-Estimate of Class Members:** The defendant estimates that there are approximately 48,000 class members. Included on the enclosed CD-ROM is a table containing the defendant's estimate of the number of class members residing in each State and territory, and its estimate of the proportionate share of the claims of such members to the entire settlement.
8. **28 U.S.C. § 1715(b)(8): Judicial Opinions Related to the Settlement:** The Court has not issued any judicial opinion relating to the above-described settlement materials.

If you have any questions about the details of this case and settlement, please contact Defense Counsel's representative at:

Kuruvilla J. Olasa  
Munger Tolles & Olson LLP  
350 S. Grand Ave, 50th Floor  
Los Angeles, CA 90071  
Phone: 213-683-9100  
[Kuruvilla.Olasa@mto.com](mailto:Kuruvilla.Olasa@mto.com)

If you have questions or concerns about this notice or the enclosed materials, or if you did not receive any of the above-listed materials, please contact:

Angeion Group  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
(p) 215-563-4116  
(f) 215-563-8839

Sincerely,

Angeion Group  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
(p) 215-563-4116  
(f) 215-563-8839



# **EXHIBIT B**



1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
(p) 215-563-4116  
(f) 215-563-8839  
www.angeiongroup.com

October 19, 2022

VIA USPS PRIORITY MAIL

United States Attorney General &  
Appropriate Officials

**Re: Notice of Class Action Settlement**

*In re Google Play Developer Antitrust Litigation*  
Case No. 3:20-cv-05792-JD (N.D. Cal.)

Dear Counsel or Official:

Angeion Group, an independent claims administrator, writes on behalf of the Defendant Google, LLC (“Google”) in the action described below, to provide your office with an update to the Notice we mailed to your office on July 8, 2022, pursuant to the provisions of the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715, to advise you of the following proposed class action settlement:

**Case Name:** *In re Google Play Developer Antitrust Litigation*

**Index Number:** 3:20-cv-05792-JD

**Jurisdiction:** United States District Court for the Northern District of California, San Francisco Division

**Date Renewed Motion for Preliminary Approval Was Filed:** October 12, 2022

On June 30, 2022, an initial motion for preliminary approval was filed, which was followed by our July 8, 2022 letter to your office. That motion did not proceed to resolution. On October 12, 2022, class counsel filed the Developer Plaintiffs’ Renewed Motion for Preliminary Settlement. In accordance with the requirements of 28 U.S.C. § 1715, we hereby provide the following information, and copies of the documents described below associated with this action on the enclosed CD-ROM:

1. **28 U.S.C. § 1715(b)(1)-Complaint:** A copy each of the following are enclosed on the CD-ROM:
  - a. Class Action Complaint; Complaint for Violation of the Sherman Act and California Unfair Competition Law, Dkt. 1, *Pure Sweat Basketball, Inc. v. Google LLC*, No. 3:20-cv-05792-JD (N.D. Cal. Aug. 17, 2020).
  - b. First Consolidated Class Action Complaint for Violation of the Sherman and Clayton Acts (15 U.S.C. §§ 1, 2, 3, 15, 26), Cartwright Act (Cal. Bus. & Prof. Code §§ 16700 et seq.) and Unfair Competition Law (Cal. Bus. & Prof. Code §§ 17200 et seq.), Dkt. 56, *Pure Sweat Basketball, Inc. v. Google LLC*, No. 3:20-cv-05792-JD (N.D. Cal. Oct. 21, 2020).

- c. First Amended Consolidated Class Action Complaint for Violation of the Sherman and Clayton Acts (15 U.S.C. §§ 1, 2, 3, 15, 26), Cartwright Act (Cal. Bus. & Prof. Code §§ 16700 et seq.) and Unfair Competition Law (Cal. Bus. & Prof. Code §§ 17200 et seq.), *In re Google Play Developer Antitrust Litigation*, Dkt. 141, No. 3:20-cv-05792-JD (N.D. Cal. Aug. 30, 2021).
  - d. Second Amended Consolidated Class Action Complaint for Violation of the Sherman and Clayton Acts (15 U.S.C. §§ 1, 2, 3, 15, 26), Cartwright Act (Cal. Bus. & Prof. Code §§ 16700 et seq.) and Unfair Competition Law (Cal. Bus. & Prof. Code §§ 17200 et seq.), Dkt. 179, *In re Google Play Developer Antitrust Litigation*, No. 3:20-cv-05792-JD (N.D. Cal. Jan. 21, 2022).
2. **28 U.S.C. § 1715(b)(2)-Notice of Any Scheduled Judicial Hearings:** The hearing on the class plaintiffs' motion for preliminary approval of the settlement is currently scheduled to occur at 10:00 a.m. (Pacific Time), on November 17, 2022. No other judicial hearings relating to the settlement are scheduled.
  3. **28 U.S.C. § 1715(b)(3)-Notification to Class Members:** Copies of the revised optional Claim Form, revised Email Notice, revised Postcard Notice, revised Long-Form Notice, and Google's supplemental Google Play Console notice, all filed with the Court on October 12, 2022, are included on the enclosed CD-ROM. If the Court preliminarily approves the Settlement, information about the settlement will be available on the following website, which will be provided to class members in the proposed Notice documents described above: [www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com).
  4. **28 U.S.C. § 1715(b)(4)-Class Action Settlement Agreement:** The Amended Settlement Agreement and Release, filed with the Court on October 12, 2022, is included on the enclosed CD-ROM.
  5. **28 U.S.C. § 1715(b)(5)-Any Settlement or Other Agreements:** There are no other settlements or other agreements that have been contemporaneously made between class counsel and counsel for the defendant.
  6. **28 U.S.C. § 1715(b)(6)-Final Judgment:** As of the date of this letter, no final judgment or notice of dismissal has been entered in this case. A copy of the revised Proposed Order Regarding Developer Plaintiffs' Motion for Preliminary Settlement Approval and filed with the Court on October 12, 2022, is included on the enclosed CD-ROM.
  7. **28 U.S.C. § 1715(b)(7)-Estimate of Class Members:** The defendant estimates that there are approximately 48,000 class members. Included on the enclosed CD-ROM is a table containing the defendant's estimate of the number of class members residing in each State and territory, and its estimate of the proportionate share of the claims of such members to the entire settlement.
  8. **28 U.S.C. § 1715(b)(8): Judicial Opinions Related to the Settlement:** The Court has not issued any judicial opinion relating to the above-described settlement materials.

If you have any questions about the details of this case and settlement, please contact Defense Counsel's representative at:

Kuruvilla J. Olasa  
Munger Tolles & Olson LLP  
350 S. Grand Ave, 50th Floor  
Los Angeles, CA 90071  
Phone: 213-683-9100  
Kuruvilla.Olasa@mto.com

If you have questions or concerns about this notice or the enclosed materials, or if you did not receive any of the above-listed materials, please contact:

Angeion Group  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
(p) 215-563-4116  
(f) 215-563-8839

Sincerely,

Angeion Group  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
(p) 215-563-4116  
(f) 215-563-8839

# **EXHIBIT C**

From: Settlement Administrator <<info@googleplaydevelopersettlement.com>>

Subject: Class Action Notice: Google Play Developer Antitrust Litigation

**CLASS ID:** <<Class ID Number>>

**CONFIRMATION CODE:** <<Confirmation Code>>

## LEGAL NOTICE

*A court authorized this notice. This is not a solicitation.*

**If you are a U.S. app developer that has earned not more than \$2,000,000 per year selling apps and digital content in the Google Play store, you are entitled to an automatic payment ranging from \$250 to amounts exceeding \$200,000.**

**By default, your payment will be issued by check addressed to <<Entity/Individual Name>> at <<Address>>. You do not need to take any further action to be issued a payment by check.** To endorse the check, you will be required to verify membership in the Settlement Class.

If you wish to receive a digital payment (through PayPal, Venmo, or virtual prepaid card) instead of a physical check, you can make that election by visiting the settlement website ([www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com)) and verifying your membership in the Settlement Class.

### WHAT IS THIS NOTICE ABOUT?

In this class action lawsuit pending against Google, Plaintiffs claimed that Google monopolized (or attempted to monopolize) alleged markets related to the distribution of Android OS apps and in-app products, and engaged in unlawful tying conduct, in violation of U.S. and California law. Google denies all allegations and this settlement is not an admission of wrongdoing. Both Plaintiffs and Google agreed to settle this case to move forward, avoid the distraction of litigation, and provide support to the developer community. This notice summarizes your legal rights. You should visit the settlement website ([www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com)) to obtain more detailed information about the proposed settlement and your rights. You also can contact the settlement administrator by mail, email or by calling toll-free:

Google Play Developer Settlement Administrator  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
Email: [info@googleplaydevelopersettlement.com](mailto:info@googleplaydevelopersettlement.com)  
Toll-Free: (844) 423-3488

**AM I A CLASS MEMBER?**

**You are receiving this notice because Google’s records indicate that you may be a member of the class (a “Settlement Class Member.”) and be entitled an automatic cash payment.** You are a Settlement Class Member if you are a current or former U.S. developer of any Android OS application or in-app product (including subscriptions) and satisfy the following criteria:

- (1) Sold an application or in-app product (including subscriptions) for a non-zero price between August 17, 2016 and December 31, 2021;
- (2) Paid Google a service fee greater than 15% on at least one such transaction between August 17, 2016 and December 31, 2021; and
- (3) Earned proceeds between U.S. \$0 and U.S. \$2,000,000.00 through Google Play in every calendar year between and inclusive of 2016 and 2021. For these purposes, the 2016 calendar year consists of August 17, 2016 to December 31, 2016.

### **HOW CAN I RECEIVE A PAYMENT FROM THE SETTLEMENT?**

Under the settlement, Google has agreed to establish a \$90 million settlement fund (the “Settlement Fund”). If the Settlement is approved by the Court, **Settlement Class Members who do not request to be excluded from the Settlement will be entitled to a minimum cash payment of \$250 to amounts estimated to exceed \$200,000.** Payment amounts are based on the amount of service fees Settlement Class Members have paid to Google. Settlement Class Members who paid greater service fees are entitled to a greater distribution from the Settlement Fund.

**To determine your estimated minimum payment, visit [www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com) and use the following Class Id: [XX] and Confirmation Code: [XX].**

**By default, your payment will be issued by check addressed to <<Entity/Individual Name>> at <<Address>>. You do not need to take any further action to be issued a payment by check.** To endorse the check, you will be required to verify membership in the Settlement Class.

If you believe the recipient name or address identified above is incorrect, or if you wish to contest your estimated payment amount, you must contact the settlement administrator at [info@googleplaydevelopersettlement.com](mailto:info@googleplaydevelopersettlement.com) or toll-free at (844) 423-3488 by May 30, 2023.

If you wish to receive a digital payment (through PayPal, Venmo, or virtual prepaid card) instead of a physical check, you can make that election by visiting the settlement website ([www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com)) and verifying your membership in the Settlement Class.

### **WHAT OTHER BENEFITS CAN I GET FROM THE SETTLEMENT**

In addition to establishing a \$90 million Settlement Fund, the settlement also requires Google to do the following:

- Through May 25, 2025, Google shall maintain for U.S. Developers a service fee of no greater than fifteen percent (15%) for the first \$1M of developer earnings each year, pursuant to the terms and conditions of Google Play and subject to program participation requirements.
- For a period of at least three (3) years following final approval of the settlement (the “Final Approval Order”), Google shall continue to allow developers to use contact information obtained in-app (with user consent) to communicate with users out-of-app, including to promote alternatives to Google Play’s billing system. Google will eliminate the following sentence from ¶ 4.9 of its Developer Distribution Agreement (DDA): ~~You may not use user information obtained via Google Play to sell or distribute Products outside of Google Play.~~
- For a period of at least three (3) years following the public release of Android 12 (October 4, 2021), Google shall, subject to technical requirements maintain in subsequent versions of Android the changes implemented in Android 12 that Google believes made it even easier for people to use other app stores on their mobile devices while being careful not to compromise the safety measures Android has in place.
- For at least two (2) years following the Final Approval Order, Google Play will develop an “Indie Apps Corner” on the apps tab on the U.S. homepage of the Google Play store. The Indie Apps Corner will spotlight a collection of qualifying independent and small startup developers building high quality and unique apps, and would be refreshed at least quarterly.
- For a period of at least three (3) years following the Final Approval Order, Google will publish an annual transparency report that, at a minimum, will convey meaningful statistics such as apps removed from Google Play, account termination, and objective information regarding how users interact with Google Play.

### **HOW CAN I EXCLUDE MYSELF FROM THE CLASS?**

If you don’t want to be legally bound by the settlement, your request to be excluded must be received by April 5, 2023, or you will not be able to sue or be part of any other lawsuit against Google related to the subject matter of this lawsuit or the claims released by the settlement agreement. Refer to the settlement website ([www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com)) and the detailed [Class Notice](#) for information and instructions on how to exclude yourself.

### **HOW CAN I OBJECT?**

If you want to remain a Settlement Class Member, but you want to object to the settlement and/or to class counsel’s request for attorneys’ fees and expenses, your objection must be received by April 5, 2023. Refer to the settlement website and the detailed Class Notice for information and instructions on how to object. The Court will consider objections at a final hearing in this case (*In re Google Play Developer Antitrust Litigation*, Case No. 30:20-cv-05792-JD) on May 18, 2023 at 10 a.m., at the United States District Court for the Northern District of California, San Francisco Courthouse, Courtroom 11, 450 Golden Gate Avenue, San Francisco, CA 94102, to consider whether to approve (1) the settlement; (2) class counsel’s request for attorneys’ fees and expenses;



and (3) named plaintiff service awards. You may appear at the final hearing, but you don't need to. The date of the final hearing may change without further notice and may be confirmed on the Court's Public Access to Court Electronic Records (PACER) site, for a fee, at <https://ecf.cand.uscourts.gov>. Information about the final hearing will also be posted on the settlement website.

**WHERE CAN I GET MORE INFORMATION?**

**Please do not contact the Court or Google for information about the settlement.** Please visit the settlement website at [www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com), or call toll free (844) 423-3488 to obtain more complete information about the proposed settlement and your rights. You may also write to class counsel at:

Google Play Developer Settlement Administrator  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103

[Unsubscribe](#)

# **EXHIBIT D**

**If you are a U.S. app developer that has earned not more than \$2,000,000 per year selling apps and digital content on the Google Play store, you are entitled to an automatic payment.**

For more information on the proposed settlement, to file a Payment Selection Forman objection, or to exclude yourself, visit the settlement website or contact the Settlement Administrator or Class Counsel.

**Do not contact the Court or Google for information about the settlement.**

RETURN ADDRESS

«ScanString»

Postal Service: Please do not mark barcode

Class ID: «Class ID»  
«FirstName» «LastName»  
«Address1»  
«Address2»  
«City», «StateCd» «Zip»  
«CountryCd»

**[www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com)**

**PLEASE RETAIN THIS POSTCARD FOR YOUR RECORDS**  
**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

In a class action lawsuit pending against Google, Plaintiffs claimed that Google monopolized (or attempted to monopolize) alleged markets related to the distribution of Android OS apps and in-app products in violation of U.S. and California law. Google denies all allegations and this settlement is not an admission of wrongdoing. Both Plaintiffs and Google agreed to settle this case to move forward, avoid the distraction of litigation, and provide support to the developer community. This notice summarizes your legal rights. You should visit the settlement website to obtain more detailed information about the proposed settlement. You also may write to the Settlement Administrator at the address on the reverse side, or call toll free at (844) 423-3488.

**What payment can I get from the settlement?** Settlement Class Members are entitled to a cash payment from a \$90 million Settlement Fund. Estimated minimum payments will range from \$250 to amounts exceeding \$200,000. To determine your payment, visit [www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com) and use the following Class Id: [XX] and Confirmation Code: [XX]. By default, your payment will be issued by check addressed to <<Entity/Individual Name>> at <<Address>>. To endorse the check, you will be required to confirm your membership in the Settlement Class. If you believe the recipient name or address above is incorrect, or if you wish to contest your payment amount, you must contact the settlement administrator at [info@googleplaydevelopersettlement.com](mailto:info@googleplaydevelopersettlement.com) or toll-free at (844) 423-3488 by May 30, 2023. If you wish to receive a digital payment instead of a check, you can make that election at [www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com).

**Am I a Class Member?** Yes, if you are a current or former U.S. developer of any Android OS application or in-app product (including subscriptions) and satisfy the following criteria: (1) Sold an application or in-app product (including subscriptions) for a non-zero price between August 17, 2016 and December 31, 2021; (2) Paid Google a service fee greater than 15% on at least one such transaction between August 17, 2016 and December 31, 2021; and (3) Earned proceeds between U.S. \$0 and U.S. \$2,000,000.00 through Google Play in every calendar year between and inclusive of 2016 and 2021. For these purposes, the 2016 calendar year consists of August 17, 2016 to December 31, 2016.

**Does the settlement contain other benefits?** Yes. Google has also agreed to maintain through May 25, 2025 a service fee no greater than 15% on the first \$1 million of U.S. developer earnings. For at least three years after final approval of the settlement, Google will also (a) continue to permit U.S. developers to use contact information obtained in-app to communicate with users out-of-app, and (b) publish an annual transparency report. For a period of at least 3 years following the public release of Android 12 (October 4, 2021), Google will, subject to technical requirements, maintain in subsequent versions of Android the changes implemented in Android 12. For at least two years after final approval, Google will maintain an "Indie Apps Corner" on the apps tab on the U.S. homepage of Google Play, which will feature apps created by qualifying independent and small startup developers.

**How can I exclude myself from the class?** If you don't want to be legally bound by the settlement, your request to be excluded must be **received by April 5, 2023**, or you will not be able to sue, continue to sue, or be part of any other lawsuit against Google related to the subject matter of this lawsuit or the claims released by the settlement agreement. Refer to the settlement website and the detailed Class Notice for information and instructions on how to exclude yourself.

**How can I object?** If you want to stay in the settlement class, but object to the settlement and/or to class counsel's request for attorneys' fees and expenses, your objection must be **received by April 5, 2023**. Refer to the settlement website and the detailed Class Notice for instructions on how to object. The Court will consider objections at a final hearing in this case (In re *Google Play Developer Antitrust Litigation*, Case No. 3:20-cv-05792) on **May 18, 2023 at 10:00 a.m.** at the United States District Court for the Northern District of California, San Francisco Courthouse, Courtroom 11, 450 Golden Gate, San Francisco, CA, to consider whether to approve (1) the settlement; (2) class counsel's request for attorneys' fees and expenses; and (3) named plaintiff service awards. You may appear at the final hearing, but do not have to. The date of the final hearing may change without further notice and may be confirmed on the Court's website at <https://ecf.cand.uscourts.gov> and the settlement website.

**Where can I get more information?** Please visit the settlement website at [www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com) or call toll free at (844) 423-3488 to obtain more complete information about the proposed settlement and your rights. You may also email class counsel at: [info@googleplaydevelopersettlement.com](mailto:info@googleplaydevelopersettlement.com).

**[www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com)**

# EXHIBIT E

From: Settlement Administrator <<info@googleplaydevelopersettlement.com>>

Subject: REMINDER: Class Action Notice: Google Play Developer Antitrust Litigation

CLASS ID: <<Class ID Number>>

CONFIRMATION CODE: <<Confirmation Code>>

### **REMINDER LEGAL NOTICE**

*A court authorized this notice. This is not a solicitation.*

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### **WHAT IS THIS NOTICE ABOUT?**

In this class action lawsuit pending against Google, Plaintiffs claimed that Google monopolized (or attempted to monopolize) alleged markets related to the distribution of Android OS apps and in-app products, and engaged in unlawful tying conduct, in violation of U.S. and California law. Google denies all allegations and this settlement is not an admission of wrongdoing. Both Plaintiffs and Google agreed to settle this case to move forward, avoid the distraction of litigation, and provide support to the developer community. This notice summarizes your legal rights. You should visit the settlement website ([www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com)) to obtain more detailed information about the proposed settlement and your rights. You also can contact the settlement administrator by mail, email or by calling toll-free:

Google Play Developer Settlement Administrator  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
Email: [info@googleplaydevelopersettlement.com](mailto:info@googleplaydevelopersettlement.com)  
Toll-Free: (844) 423-3488

**AM I A CLASS MEMBER?**

**You are receiving this notice because Google’s records indicate that you may be a member of the class (a “Settlement Class Member.”) and be entitled an automatic cash payment.** You are a Settlement Class Member if you are a current or former U.S. developer of any Android OS application or in-app product (including subscriptions) and satisfy the following criteria:

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- (3) Earned proceeds between U.S. \$0 and U.S. \$2,000,000.00 through Google Play in every calendar year between and inclusive of 2016 and 2021. For these purposes, the 2016 calendar year consists of August 17, 2016 to December 31, 2016.

### **HOW CAN I RECEIVE A PAYMENT FROM THE SETTLEMENT?**

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In addition to establishing a \$90 million Settlement Fund, the settlement also requires Google to do the following:

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### **HOW CAN I EXCLUDE MYSELF FROM THE CLASS?**

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### **HOW CAN I OBJECT?**

If you want to remain a Settlement Class Member, but you want to object to the settlement and/or to class counsel’s request for attorneys’ fees and expenses, your objection must be received by April 5, 2023. Refer to the settlement website and the detailed Class Notice for information and instructions on how to object. The Court will consider objections at a final hearing in this case (*In re Google Play Developer Antitrust Litigation*, Case No. 30:20-cv-05792-JD) on May 18, 2023 at 10 a.m., at the United States District Court for the Northern District of California, San Francisco Courthouse, Courtroom 11, 450 Golden Gate Avenue, San Francisco, CA 94102, to consider whether to approve (1) the settlement; (2) class counsel’s request for attorneys’ fees and expenses;



and (3) named plaintiff service awards. You may appear at the final hearing, but you don't need to. The date of the final hearing may change without further notice and may be confirmed on the Court's Public Access to Court Electronic Records (PACER) site, for a fee, at <https://ecf.cand.uscourts.gov>. Information about the final hearing will also be posted on the settlement website.

**WHERE CAN I GET MORE INFORMATION?**

**Please do not contact the Court or Google for information about the settlement.** Please visit the settlement website at [www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com), or call toll free (844) 423-3488 to obtain more complete information about the proposed settlement and your rights. You may also write to class counsel at:

Google Play Developer Settlement Administrator  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103

[Unsubscribe](#)

# **EXHIBIT F**

**REMINDER**

**If you are a U.S. app developer that has earned not more than \$2,000,000 per year selling apps and digital content on the Google Play store, you are entitled to an automatic payment.**

For more information on the proposed settlement, to file a Payment Selection Forman objection, or to exclude yourself, visit the settlement website or contact the Settlement Administrator or Class Counsel.

**Do not contact the Court or Google for information about the settlement.**

RETURN ADDRESS

«ScanString»

Postal Service: Please do not mark barcode

Class ID: «Class ID»  
«FirstName» «LastName»  
«Address1»  
«Address2»  
«City», «StateCd» «Zip»  
«CountryCd»

**[www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com)**

**PLEASE RETAIN THIS POSTCARD FOR YOUR RECORDS**  
**REMINDER NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

In a class action lawsuit pending against Google, Plaintiffs claimed that Google monopolized (or attempted to monopolize) alleged markets related to the distribution of Android OS apps and in-app products in violation of U.S. and California law. Google denies all allegations and this settlement is not an admission of wrongdoing. Both Plaintiffs and Google agreed to settle this case to move forward, avoid the distraction of litigation, and provide support to the developer community. This notice summarizes your legal rights. You should visit the settlement website to obtain more detailed information about the proposed settlement. You also may write to the Settlement Administrator at the address on the reverse side, or call toll free at (844) 423-3488.

**What payment can I get from the settlement?** Settlement Class Members are entitled to a cash payment from a \$90 million Settlement Fund. Estimated minimum payments will range from \$250 to amounts exceeding \$200,000. To determine your payment, visit [www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com) and use the following Class Id: [XX] and Confirmation Code: [XX]. By default, your payment will be issued by check addressed to <<Entity/Individual Name>> at <<Address>>. To endorse the check, you will be required to confirm your membership in the Settlement Class. If you believe the recipient name or address above is incorrect, or if you wish to contest your payment amount, you must contact the settlement administrator at [info@googleplaydevelopersettlement.com](mailto:info@googleplaydevelopersettlement.com) or toll-free at (844) 423-3488 by May 30, 2023. If you wish to receive a digital payment instead of a check, you can make that election at [www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com).

**Am I a Class Member?** Yes, if you are a current or former U.S. developer of any Android OS application or in-app product (including subscriptions) and satisfy the following criteria: (1) Sold an application or in-app product (including subscriptions) for a non-zero price between August 17, 2016 and December 31, 2021; (2) Paid Google a service fee greater than 15% on at least one such transaction between August 17, 2016 and December 31, 2021; and (3) Earned proceeds between U.S. \$0 and U.S. \$2,000,000.00 through Google Play in every calendar year between and inclusive of 2016 and 2021. For these purposes, the 2016 calendar year consists of August 17, 2016 to December 31, 2016.

**Does the settlement contain other benefits?** Yes. Google has also agreed to maintain through May 25, 2025 a service fee no greater than 15% on the first \$1 million of U.S. developer earnings. For at least three years after final approval of the settlement, Google will also (a) continue to permit U.S. developers to use contact information obtained in-app to communicate with users out-of-app, and (b) publish an annual transparency report. For a period of at least 3 years following the public release of Android 12 (October 4, 2021), Google will, subject to technical requirements, maintain in subsequent versions of Android the changes implemented in Android 12. For at least two years after final approval, Google will maintain an "Indie Apps Corner" on the apps tab on the U.S. homepage of Google Play, which will feature apps created by qualifying independent and small startup developers.

**How can I exclude myself from the class?** If you don't want to be legally bound by the settlement, your request to be excluded must be **received by April 5, 2023**, or you will not be able to sue, continue to sue, or be part of any other lawsuit against Google related to the subject matter of this lawsuit or the claims released by the settlement agreement. Refer to the settlement website and the detailed Class Notice for information and instructions on how to exclude yourself.

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**Where can I get more information?** Please visit the settlement website at [www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com) or call toll free at (844) 423-3488 to obtain more complete information about the proposed settlement and your rights. You may also email class counsel at: [info@googleplaydevelopersettlement.com](mailto:info@googleplaydevelopersettlement.com).

**[www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com)**

# **EXHIBIT G**

**Claim Administrator Angeion Group Announces Proposed Settlement in Google Play Store Antitrust Litigation Involving U.S. Android OS Application Developers**

PHILADELPHIA, Jan. 31, 2023 /Businesswire/ -- Angeion Group today announces a settlement has been reached with Google in an antitrust class action lawsuit about the Google Play store. The lawsuit was brought by U.S. app developers alleging that Google monopolized (or attempted to monopolize) markets related to the distribution of Android OS apps and in-app products in violation of U.S. and California law. Google denies all allegations and the settlement is not an admission of wrongdoing by Google.

**You may be included in this settlement and entitled to receive a payment if you are or were a U.S. developer of any Android OS application or in-app product (including subscriptions) that:**

- Sold an application or in-app product (including subscriptions) for a non-zero price between August 17, 2016 and December 31, 2021;
- Paid Google a service fee greater than 15% on at least one such transaction between August 17, 2016 and December 31, 2021; and
- Earned proceeds between U.S. \$0 and U.S. \$2,000,000.00 through Google Play in every calendar year between and inclusive of 2016 and 2021. For this purpose, the 2016 calendar year shall consist of August 17, 2016 through December 31, 2016.

**U.S. developers who meet this criteria are entitled to a minimum cash payment ranging from \$250 to amounts exceeding \$200,000.**

For more information, including the full Notice, Payment Selection Form, and Settlement Agreement go to [www.googleplaydeveloperssettlement.com](http://www.googleplaydeveloperssettlement.com), contact the Settlement Administrator at 1-844-423-3488, or email your questions to [info@googleplaydeveloperssettlement.com](mailto:info@googleplaydeveloperssettlement.com).

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS. All questions regarding the Settlement or claims process should be directed to the Settlement Administrator.

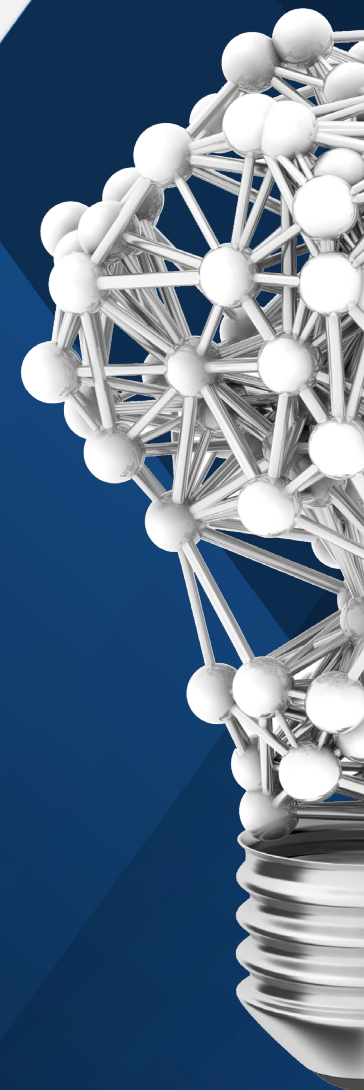
**Media Contact:**

Angeion Group  
Steven Weisbrot  
Chief Executive Officer  
(215) 563-4116



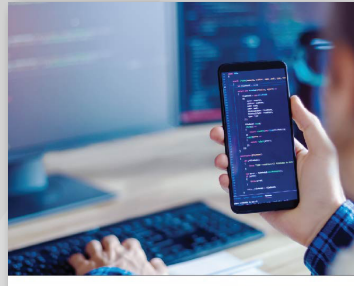
## **Banner Ads**

# Google Play Developer's Antitrust



# Banner Ad

160x600



You may be eligible for a settlement payment as a Google Play App Developer

Review Estimated Payment and Submit Payment Request

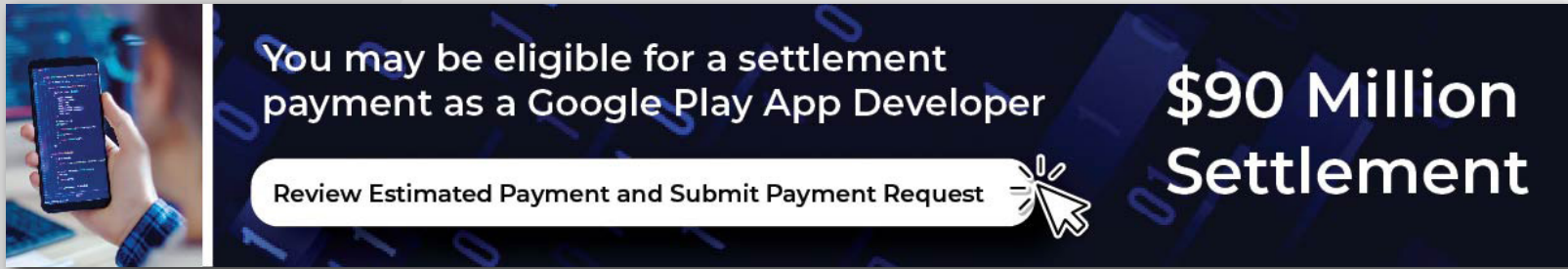


\$90 Million Settlement



# Banner Ad

300x50



The banner features a dark blue background with a subtle pattern of binary code (0s and 1s). On the left, there is a small inset image of a person's hand holding a smartphone displaying a code editor. The main text is white and reads: "You may be eligible for a settlement payment as a Google Play App Developer". Below this text is a white button with rounded corners that says "Review Estimated Payment and Submit Payment Request" and has a white mouse cursor icon pointing at it. To the right of the button, the text "\$90 Million Settlement" is displayed in a large, bold, white font.

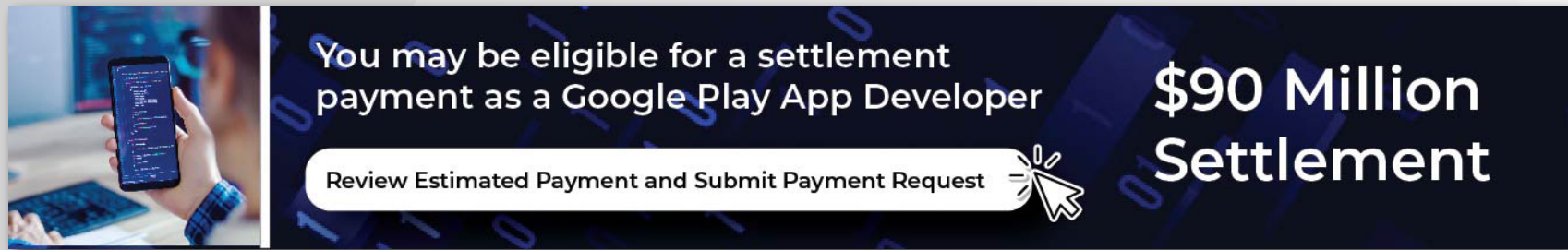
You may be eligible for a settlement  
payment as a Google Play App Developer

[Review Estimated Payment and Submit Payment Request](#)

**\$90 Million  
Settlement**

# Banner Ad

320x50



The banner features a dark blue background with a subtle pattern of binary code (0s and 1s). On the left, there is a photograph of a person's hands holding a smartphone displaying a list of app statistics. The main text is in white, with the settlement amount '\$90 Million Settlement' in a larger font. A white button with a mouse cursor icon is positioned below the main text.

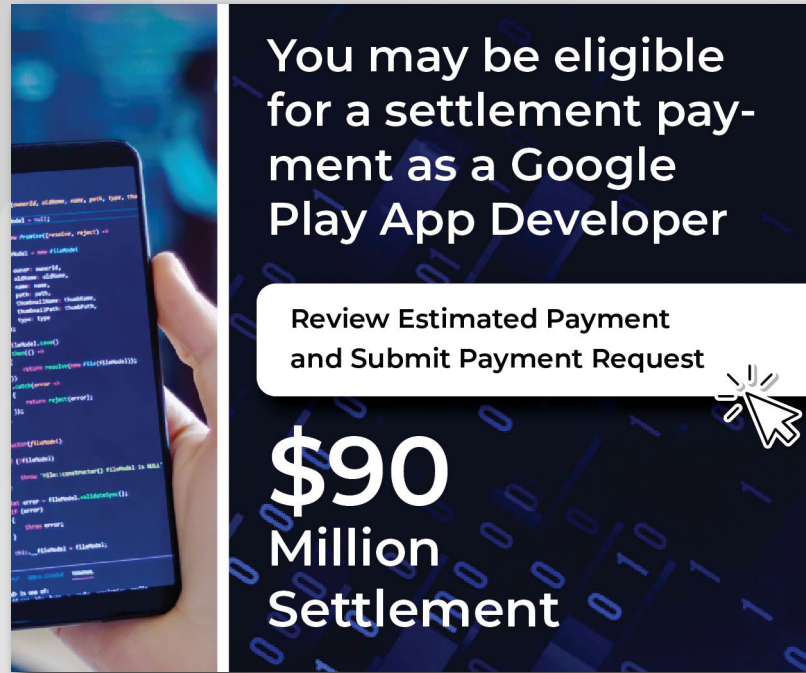
You may be eligible for a settlement  
payment as a Google Play App Developer

**\$90 Million  
Settlement**

Review Estimated Payment and Submit Payment Request

# Banner Ad

300x250

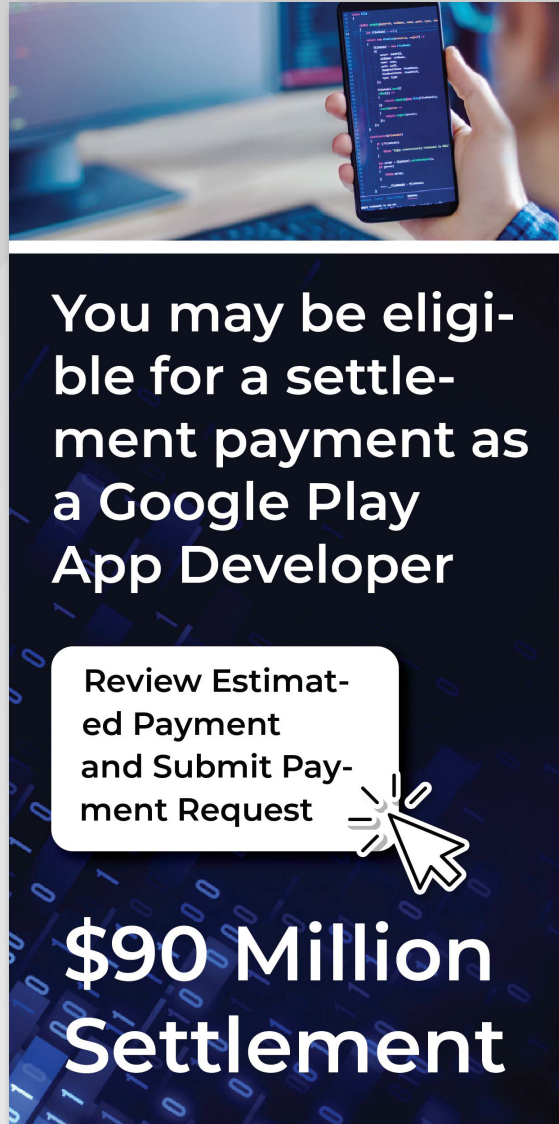


The banner advertisement is set against a dark blue background with a faint pattern of binary code (0s and 1s). On the left side, there is a vertical image of a hand holding a smartphone. The screen of the phone displays a snippet of code in a dark-themed editor, with lines of code in white and green. The code includes comments and function calls, such as `await firebase.auth().signInWithEmailAndPassword(email, password);` and `firebase.firestore().collection('users').doc(userId).set({});`.

The main text of the ad is in white, bold font. It reads: "You may be eligible for a settlement payment as a Google Play App Developer". Below this, a white rectangular button with rounded corners contains the text "Review Estimated Payment and Submit Payment Request" in a smaller white font. To the right of the button is a white mouse cursor icon pointing towards the button. At the bottom of the ad, the text "\$90 Million Settlement" is displayed in a large, white, bold font.

# Banner Ad

300x600



The banner ad features a dark blue background with a subtle pattern of binary code (0s and 1s). At the top, there is a photograph of a person's hand holding a smartphone displaying a code editor interface. Below the photo, the text is centered and reads: "You may be eligible for a settlement payment as a Google Play App Developer". Underneath this text is a white rounded rectangular button with the text "Review Estimated Payment and Submit Payment Request" and a white mouse cursor icon pointing at the bottom right corner of the button. At the bottom of the banner, the text "\$90 Million Settlement" is displayed in a large, bold, white font.

You may be eligible for a settlement payment as a Google Play App Developer

Review Estimated Payment and Submit Payment Request

**\$90 Million Settlement**

# Banner Ad

728x90



The banner ad features a dark blue background with a subtle pattern of binary code (0s and 1s). On the left, there is a small inset image showing a person's hands holding a smartphone displaying code. The main text is in white, with a call-to-action button and a large settlement amount.

You may be eligible for a settlement payment as a Google Play App Developer

Review Estimated Payment and Submit Payment Request

**\$90 Million Settlement**

# Banner Ad

970x250



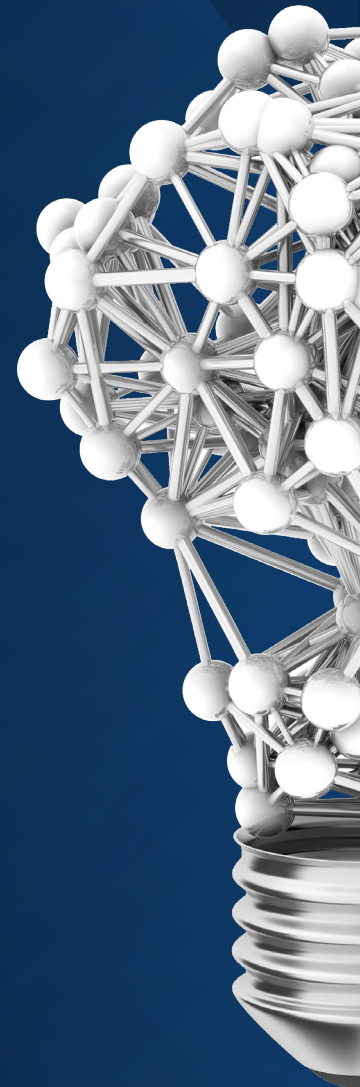
The banner features a dark blue background with a faint pattern of binary code (0s and 1s). On the left, there is a vertical image of a person's hand holding a smartphone displaying code. The main text is in white, with the settlement amount '\$90 Million Settlement' in a large, bold font. A white call-to-action button with a mouse cursor icon is positioned in the center.

You may be eligible for a settlement payment as a Google Play App Developer

**\$90 Million Settlement**

Review Estimated Payment and Submit Payment Request

**AG** | ANGEION GROUP  
Changing the Rules



# **EXHIBIT I**



**Angeion Group**  
Sponsored · 

You are an eligible application developer



[www.settlement.com](http://www.settlement.com)  
**Click to Claim Settlement Payment** **Apply now**

 Like  Comment  Share

Instagram

**angeion\_group**  
Sponsored



**Apply now** 

angeion\_group You are an eligible application developer

**Angeion Group**  
Sponsored ·   


You are an eligible application developer





[www.settlement.com](http://www.settlement.com)  
**Click to Claim Settlement Payment** **Apply now**





 Like  Comment  Share

Instagram




**angeion\_group**  
Sponsored 




**Apply now** 

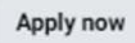
   




angeion\_group You are an eligible application developer

**Angeion Group**  
Sponsored ·   


You are an eligible application developer





[www.settlement.com](http://www.settlement.com)  
**Click to Claim Settlement Payment** 





 Like  Comment  Share

Instagram

**angeion\_group**  
Sponsored 



**Apply now** 

angeion\_group You are an eligible application developer

# **EXHIBIT J**

**Google Play Console Notice**

Dear Google Play Developer,

You may be entitled to a payment as a class member in a class action settlement between Google and a class of app developers. Please visit [www.googleplaydevelopersettlement.com](http://www.googleplaydevelopersettlement.com) for more details about the settlement.

Please do not contact Google regarding this settlement. Inquiries should be directed to the Settlement Administrator at:

Google Play Developer Settlement Administrator  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103  
Email: [Info@GooglePlayDeveloperSettlement.com](mailto:Info@GooglePlayDeveloperSettlement.com)  
Toll-Free: 844-423-3488

Google Play Team

# **EXHIBIT K**

**EXHIBIT K – VALID EXCLUSION REQUESTS**

<b>No.</b>	<b>Party</b>
1	Applied Vanilla Studios
2	Granite Nutrition LLC
3	Val-U-Pro Consulting Group
4	Phantomalert Inc.
5	Fotoborn Media
6	Brainstorm Games LLC
7	Seeds Software