

1 THEODORE J. BOUTROUS JR., SBN 132099
tboutrous@gibsondunn.com
2 RICHARD J. DOREN, SBN 124666
rdoren@gibsondunn.com
3 DANIEL G. SWANSON, SBN 116556
dswanson@gibsondunn.com
4 JAY P. SRINIVASAN, SBN 181471
jsrinivasan@gibsondunn.com
5 GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue Los Angeles, CA 90071
6 Telephone: 213.229.7000
Facsimile: 213.229.7520

7
8 VERONICA S. MOYÉ (Texas Bar No.
24000092; *pro hac vice*)ffa
vmoye@gibsondunn.com
9 GIBSON, DUNN & CRUTCHER LLP
2100 McKinney Avenue, Suite 1100
10 Dallas, TX 75201
Telephone: 214.698.3100
11 Facsimile: 214.571.2900

12 MARK A. PERRY, SBN 212532
mperry@gibsondunn.com
13 CYNTHIA E. RICHMAN (D.C. Bar No.
492089; *pro hac vice*)
14 crichman@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
15 1050 Connecticut Avenue, N.W.
Washington, DC 20036
16 Telephone: 202.955.8500
Facsimile: 202.467.0539

17
18 ETHAN D. DETTMER, SBN 196046
edettmer@gibsondunn.com
RACHEL S. BRASS, SBN 219301
19 rbrass@gibsondunn.com
CAELI A. HIGNEY, SBN 268644
20 chigney@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
21 555 Mission Street
San Francisco, CA 94105
22 Telephone: 415.393.8200
Facsimile: 415.393.8306

23 *Attorneys for Defendant APPLE INC.*
24
25
26
27
28

STEVE W. BERMAN (*pro hac vice*)
ROBERT F. LOPEZ (*pro hac vice*)
THEODORE WOJCIK (*pro hac vice*)
**HAGENS BERMAN SOBOL
SHAPIRO LLP**
1301 Second Ave., Suite 2000
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com
robl@hbsslaw.com
tedw@hbsslaw.com

SHANA E. SCARLETT (SBN 217895)
BENJAMIN J. SIEGEL (SBN 256260)
BEN M. HARRINGTON (SBN 313877)
**HAGENS BERMAN SOBOL
SHAPIRO LLP**
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
shanas@hbsslaw.com
bens@hbsslaw.com
benh@hbsslaw.com

*Interim Class Counsel for the
Developer Plaintiffs*

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4 DONALD R. CAMERON, *et al.*
5
6 Plaintiffs
7
8 v.
9 APPLE INC.,
10 Defendant.

Case No. 4:19-cv-03074-YGR

**JOINT STATEMENT REGARDING
REVISED PAPERS IN CONNECTION WITH
PROPOSED SETTLEMENT**

1 On November 2, 2021, the Court held a hearing on Developer Plaintiffs’ Motion for
2 Preliminary Approval of Class Action Settlement with Apple Inc. (Dkt. 396). At the hearing, the
3 Court directed that certain revisions be made to the proposed notice and claim form documents
4 attached as exhibits to the August 26, 2021 Declaration of Steven Weisbrot (the “Weisbrot
5 Declaration,” Dkt. 396-2) and also raised certain questions about those documents as well as the
6 Parties’ Settlement Agreement attached as an exhibit to the August 26, 2021 Declaration of Steve W.
7 Berman (the “Berman Declaration,” Dkt. 396-1). In accordance with the discussion at the hearing,
8 the Parties have agreed to submit the following revised versions of the proposed notice and claim
9 form documents and the Parties’ Settlement Agreement, as well as a revised [Proposed] Order
10 Granting Developer Plaintiffs’ Motion For Preliminary Approval of Class Action Settlement With
11 Defendant Apple Inc., which reflects the changes ordered by the Court:

12 1. Attached hereto as **Exhibit A** is a revised version of the Parties’ Settlement Agreement.
13 (The prior version was attached as Exhibit A to the Berman Declaration).

14 2. Attached hereto as **Exhibit B** is a revised version of the Parties’ proposed detailed Class
15 Notice. (The prior version was attached as Exhibit B to the Weisbrot Declaration).

16 3. Attached hereto as **Exhibit C** is a revised version of the Parties’ proposed Email Notice.
17 (The prior version was attached as Exhibit C to the Weisbrot Declaration).

18 4. Attached hereto as **Exhibit D** is a revised version of the Parties’ proposed Postcard
19 Notice. (The prior version was attached as Exhibit D to the Weisbrot Declaration).

20 5. Attached hereto as **Exhibit E** is a revised version of the Parties’ proposed Claim Form.
21 (The prior version was attached as Exhibit E to the Weisbrot Declaration).

22 6. Attached hereto as **Exhibit F** is a revised [Proposed] Order Granting Developer
23 Plaintiffs’ Motion For Preliminary Approval of Class Action Settlement With Defendant Apple Inc.
24 (The prior version was filed as Dkt. 395-5).

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1 RESPECTFULLY SUBMITTED,

2 Dated: November 5, 2021

HAGENS BERMAN SOBOL SHAPIRO LLP

3 Steve W. Berman
4 Robert F. Lopez
5 Shana E. Scarlett
6 Benjamin J. Siegel
7 Ben M. Harrington
8 Theodore Wojcik

9 By: /s/ Steve W. Berman

10 Steve W. Berman
11 1301 Second Avenue, Suite 2000
12 Seattle, WA 98101
13 Telephone: 206.623.0594

14 *Interim Class Counsel for the Developer Plaintiffs*

15 Dated: November 5, 2021

GIBSON, DUNN & CRUTCHER LLP

16 Theodore J. Boutrous Jr.
17 Richard J. Doren
18 Daniel G. Swanson
19 Mark A. Perry
20 Veronica S. Lewis
21 Cynthia E. Richman
22 Jay P. Srinivasan
23 Ethan D. Dettmer
24 Rachel S. Brass
25 Caeli A. Higney

26 By: /s/ Mark A. Perry

27 Mark A. Perry
28 1050 Connecticut Avenue, N.W.
Washington, DC 20036
Telephone: 202.955.8500

Attorneys for Defendant Apple Inc.

E-FILING ATTESTATION

I, Steve W. Berman, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Steve W. Berman

STEVE W. BERMAN

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