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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA
UNLIMITED JURISDICTION – COMPLEX CIVIL LITIGATION

ATTILA CSUPO, ANDREW BURKE & KERRY HECHT, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 19CV352557

Assigned for all purposes to Dept. 7
Hon. Charles F. Adams

JOINT STIPULATION AND ~~[PROPOSED]~~ ORDER APPROVING MANNER OF NOTICE OF SETTLEMENT AND APPROVAL HEARING

Complaint filed:	08/09/2019
First. Am. Compl. filed:	08/12/2019
Second Am. Compl. filed:	09/16/2020
Third Am. Compl. filed:	10/23/2020
Fourth Am. Compl. filed:	02/01/2022

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STIPULATION

Plaintiffs Attila Csupo, Andrew Burke, and Kerry Hecht ("Plaintiffs") and Defendant Google LLC ("Google"; collectively, "the Parties"), hereby stipulate and request as follows:

WHEREAS, the Parties have reached an agreement in principle to settle this case ("the Settlement"), have executed a term sheet reflecting that agreement, and are finalizing a more detailed long-form settlement agreement;

WHEREAS, California Rule of Court 3.769(f) provides that notice must be given "in the manner specified by the court" and that it must "contain an explanation of the proposed settlement and procedures for class members to follow in filing written objections to [the settlement] and in arranging to appear at the final settlement hearing and state any objections to the proposed settlement";

WHEREAS, the Parties have conferred and agreed on what they believe to be an appropriate form of the above-referenced notice, attached as Exhibit A, and as to an appropriate manner of effecting such notice, outlined in Exhibit B;

WHEREAS, Plaintiffs previously retained Angeion Group as Class Notice Administrator in this case, Angeion Group successfully implemented prior rounds of notice, and Plaintiffs propose to continue using Angeion Group as Class Notice Administrator for purposes of providing notice of the Settlement and the hearing on approval of the Settlement ("Approval Hearing") (and Google does not object);

WHEREAS, a 35-day class notice period is reasonable and provides sufficient notice for class members to submit written objections to the Court or arrange to appear at the Approval Hearing, as required by CRC 3.769(f);

WHEREAS, to accommodate that class notice period, the Parties respectfully request an Approval Hearing date the week of February 23-27, 2026;

NOW THEREFORE, the Parties respectfully request that the Court approve the form of notice of the Settlement and Approval Hearing set forth in Exhibit A; that the Court approve the plan of notice set forth in Exhibit B; that the Court appoint Angeion Group as Class Notice Administrator for purposes of providing notice of the Settlement and the

Approval Hearing; that the Court authorize the dissemination of notice of the Settlement and Approval Hearing by Angeion Group in accordance with Exhibit B after the Parties have fully executed the long-form settlement agreement; that the Court set the Approval Hearing during the week of February 23-27, 2026, or on an alternative date convenient for the Court in February 2026; and that the Court set a deadline for the Parties to submit any briefs or materials in support of approval of the Settlement.

IT IS SO STIPULATED.

Dated: December 17, 2025

COOLEY LLP

By: */s/ Whitty Somvichian*
Whitty Somvichian

Attorneys for Defendant
GOOGLE LLC

Dated: December 17, 2025

Respectfully submitted,

KOREIN TILLERY LLC

By: */s/ Marc A. Wallenstein*
Marc A. Wallenstein

Attorneys for Plaintiffs
ATTILA CSUPO, ANDREW BURKE & KERRY HECHT

~~[PROPOSED]~~ ORDER

Having heard argument from the Parties at a Case Management Conference held on December 2, 2025, and at a prior motions hearing held on November 14, 2025, and having reviewed the Parties' joint stipulation dated December 16, 2025, as well as the Parties' proposed form of notice set forth in Exhibit A to that stipulation and the Parties' proposed plan of notice as set forth in Exhibit B to that stipulation, and otherwise being fully advised regarding the matter, the Court hereby orders as follows:

1. The Court finds that a 35-day class notice period is reasonable and provides sufficient notice for class members to submit written objections to the Court or arrange to appear at the hearing on approval of the Settlement (the "Approval Hearing"), as required by CRC 3.769(f).
2. The Court hereby approves the form of notice set forth in Exhibit A. Class Counsel may, in consultation with Defendant's counsel, finalize and make non-substantive changes to the form of notice without resubmitting it to the Court, including by filling in dates in the notice that are currently blank.
3. The Court hereby approves the plan of notice set forth in Exhibit B. To be timely, any objection must be postmarked or filed by the deadline set forth in Exhibit A. Any class member who timely submits a written objection may be heard at the Approval Hearing. Any class members who fail to timely submit a written objection to the Settlement shall be deemed to have waived any such objections in this Court, on appeal, by collateral attack or otherwise, and will not be heard at the Approval Hearing.
4. The Court hereby appoints Angeion Group as Class Notice Administrator to assist Class Counsel in disseminating notice of the Settlement and Approval Hearing and for collecting and providing to the Parties any timely objections to the Settlement.
5. The Court hereby authorizes the dissemination of notice of the Settlement and Approval Hearing by Angeion Group in accordance with Exhibit B after the Parties have fully executed the long-form settlement agreement they are presently negotiating and drafting.

6. The Approval Hearing is set for February 24, 2026 at 1:30 p.m. in Department 7.

7. All briefs and other materials submitted in support of approval of the Settlement shall be filed with the Court by February 10, 2026.

IT IS SO ORDERED.

DATED: 12/22/2025 10:28:54 AM

Hon. Charles F. Adams
Superior Court of Santa Clara County

EXHIBIT A

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA
UNLIMITED JURISDICTION – COMPLEX CIVIL LITIGATION

ATTILA CSUPO, ANDREW BURKE & KERRY HECHT, individually and on behalf of all others similarly situated, Plaintiffs, v. GOOGLE LLC, Defendant.	Case No. 19CV352557 Assigned for all purposes to Dept. 7 Hon. Charles F. Adams Date: [DATE] Dept.: 7 Complaint filed: 08/09/2019 Fourth Am. Compl. filed: 02/01/2022 Trial Date: June 2, 2025

OFFICIAL COURT NOTICE OF SETTLEMENT

AND APPROVAL HEARING

PLEASE READ THIS NOTICE CAREFULLY

IT CONTAINS IMPORTANT INFORMATION ABOUT YOUR RIGHTS AS A CLASS MEMBER.

The Santa Clara County Superior Court authorized this Notice.

This is not a solicitation from a lawyer.

1. Why Should I Read This Notice?

This case, entitled *Attila Csupo et al. v. Google LLC*, Case No. 19–CV–352557 (the "Lawsuit" or "Action"), was certified to proceed as a class action in Santa Clara County Superior Court, on behalf of a class of California users of Android mobile phones (the "Class"). Trial in this matter began on June 2, 2025, in Santa Clara County Superior Court. On July 1, 2025, the jury reached a verdict in favor of the Class, awarding them $314,626,932 in damages.

Since then, the Plaintiffs and Google have negotiated a Settlement that will resolve this case and end the Lawsuit. The cash amount of the Settlement is $350 million. Google will also update some of its materials to better inform consumers and ask for their consent

to the conduct at issue in this Lawsuit. The key terms of the Settlement are described in greater detail in this Notice and on the case website, www.cellulardataclassaction.com.

As a Class member, you **do not** need to do anything now in order to be paid in this case. You will receive additional information about how you will be paid at a later date.

This Settlement avoids the appeal that Google would otherwise have pursued to challenge the trial verdict and other issues, as well as several motions that Plaintiffs brought seeking pre-judgment interest, post-judgment interest, costs, and injunctive relief.

2. Who Is a Class Member in This Lawsuit?

The Court previously certified a Class defined as "all natural persons who, while residing in the State of California, have used a mobile phone running a Google-licensed version of the Android operating system with a cellular data plan from August 9, 2016, to the present." The Settlement Agreement clarifies (1) that the relevant time period runs through the date of a Final Order and Judgment approving the Settlement, and (2) that the Class does not include any persons who previously opted out of the class before May 15, 2025.

Excluded from the Class are (i) Google, its subsidiaries and affiliates, officers, and directors, (ii) the judges to whom this Action is or has been assigned and any members of the judges' immediate family, and (iii) the Class Counsel (as defined below).

3. As a Class Member, How Will My Claims Be affected?

If you are a member of the Class and did not exclude yourself from this Lawsuit by the court-ordered Exclusion Deadline of May 15, 2025, then you are still a member of the Class. If the Settlement is approved by the Court, it will be binding on you.

4. Who Represents Me in This Lawsuit?

The Court has appointed Plaintiffs Attila Csupo, Andrew Burke, and Kerry Hecht as the Class Representatives.

The Court has approved the law firms of Korein Tillery LLC and Bartlit Beck LLP to represent the Class, whose lead attorneys are identified below. They are called "Class Counsel."

Marc A. Wallenstein KOREIN TILLERY LLC 205 North Michigan Avenue, Suite 1950 Chicago, Illinois 60601	Glen E. Summers BARTLIT BECK LLP 1801 Wewatta Street, Suite 1200 Denver, CO 80202

5. What Are the Terms of the Settlement?

The Settlement has the following key terms:

- Google will pay $350 million.
- Google will be required to update the Google Play Terms of Service, a page in Google's Help Center website, and the setup screens that are shown to Android users during device setup. These updates will disclose the conduct at issue in the Lawsuit to Android users and ask them to consent to it. Google will also disable a related setting on Android devices.
- The Plaintiffs and Class will release all claims against Google that were asserted or could have been asserted in this Lawsuit, as specified in the Settlement Agreement.
- The Parties will jointly ask the Court to vacate the existing jury verdict and judgment in this case and enter a new judgment that adopts the terms of this Settlement, and these Court orders are a requirement for the Settlement to proceed.
- Google will not pursue an appeal.

The full text of the Settlement Agreement, as well as the proposed updates to the Google Play Terms of Service, Help Center website, and Android setup screens will be available on the Lawsuit's website, www.cellulardataclassaction.com, on or before **[DATE AT LEAST 35 DAYS PRIOR TO HEARING]**.

6. What Happens Next in the Lawsuit?

The Court will hold an Approval Hearing to decide whether the Settlement is fair, reasonable, and adequate, and decide whether to approve the Settlement. That hearing is currently scheduled to take place on **MONTH DAY, YEAR**, at **XXX A.M.** before Hon. Charles F. Adams, Department 7, Superior Court, Santa Clara County. If the date, time, or location shifts, updates will be posted on www.cellulardataclassaction.com and on the public docket.

You or your own lawyer is welcome to attend the hearing at your expense, but you are not required to do so. You **do not** need to attend the hearing in order to be paid in this Lawsuit.

Class members may submit written objections to the Settlement through their personal attorney, hired by them at their own expense, or directly to the Court, either by mailing the objection to: Clerk of the Court, Superior Court of California, County of Santa Clara, 191 N. 1st Street, San Jose, California 95113, or by filing in person at the same location.

Written objections must be postmarked or filed on or before **[DATE 14 DAYS PRIOR TO HEARING]**, and a copy must also be mailed to the Settlement Administrator at the address listed below under Question 11.

If there are objections, the Court will consider them at the hearing. The Court will also listen to people who have asked to speak at the hearing.

7. Do I Need to Do Anything to Get Paid?

No, you do not need to do anything right now in order to get paid. After the Approval Hearing, the Court will decide exactly how any money will be distributed, and another Notice will be sent explaining how you will be paid.

8. How Will Class Counsel Be Paid?

Class Counsel has asked the Court to approve an award of reasonable attorney's fees and costs. Specifically, Class Counsel seeks an award of attorney's fees representing 33% of the settlement amount (or $115,500,000), plus approximately $7 million in costs that Class Counsel advanced out of their own pockets to litigate this case over more than six years. Class members were provided notice of Class Counsel's request for attorney's fees and an opportunity to object, and the Court held a hearing on November 14, 2025, and heard additional argument on December 2, 2025. The Court will decide the amount of attorney's fees and costs that will be awarded to Class Counsel.

No money will be paid to Class Counsel until after the Approval Hearing and after money is available to be distributed to the Class.

9. How Will the Costs Associated with the Notice and Administration Be Paid?

The costs associated with the notice and administration of this Lawsuit will be paid by Class Counsel. Class Counsel has sought to be reimbursed for these costs out of the settlement fund. The Court will decide this issue.

10. How Much Money Will Be Distributed to Class Members?

You will receive additional information about how much money you will be paid after the Approval Hearing. All funds will be kept in an interest-bearing settlement account until they are distributed. All funds, less the Court-approved payment of attorney's fees, litigation expenses, and costs of settlement administration, will be distributed to individual Class members to the extent practicable. Any remaining amounts that cannot practicably be distributed to Class members will be distributed to a charitable organization selected by the parties and approved by the Court.

11. Where Can I Obtain More Information about This Lawsuit?

This Notice is only a summary of the current status of this Lawsuit. For more information, please visit www.cellulardataclassaction.com or call toll-free **1-844-440-3947**. You may also contact the Settlement Administrator by mail or email at:

Cellular Data Class Action
c/o Settlement Administrator

1650 Arch Street, Suite 2210
Philadelphia, PA 19103

info@CellularDataClassAction.com

Please include the case name and number of the Lawsuit, as well as your name and your current address on any communications.

You may review the file in this case on the Court's website, **https://www.scscourt.org/**, and at the Court's public portal, **https://traffic.scscourt.org/search**, by entering the case number 19CV352557 in the box entitled "Case Number Search" and clicking "search." You may also review case materials in person at the Office of the Clerk, located at the Santa Clara County Superior Court, 191 North First Street, San Jose, California, 95113.

PLEASE DO NOT CONTACT THE COURT OR DEFENDANT'S ATTORNEYS

EXHIBIT B

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

UNLIMITED JURISDICTION – COMPLEX CIVIL LITIGATION

ATTILA CSUPO, et al., Plaintiffs, v. GOOGLE LLC, et al., Defendants.	Case No. 19CV352557 **DECLARATION OF STEVEN WEISBROT OF ANGEION GROUP RE: NOTICE OF SETTLEMENT AND APPROVAL HEARING**

I, Steven Weisbrot, declare and state as follows:

1. I am the President and Chief Executive Officer at the class action notice and claims administration firm Angeion Group, LLC ("Angeion"). Angeion specializes in designing, developing, analyzing, and implementing large-scale, unbiased, legal notification plans.

2. I have personal knowledge of the matters stated herein. In forming my opinions regarding notice in this action, I have drawn from my extensive class action experience, as previously reported to the Court in the Declaration of Steven Weisbrot of Angeion Group re: Qualifications & Notice Plan Declaration ("Class Certification Notice Plan Declaration"). As the Notice Administrator, Angeion has previously disseminated notice to the Class regarding the class certification and jury verdict rendered in this litigation.

3. The purpose of this declaration is to describe the proposed Notice Plan that, if approved by the Court, will be implemented to provide Class Members with notice of the Settlement.

SUMMARY OF THE PROPOSED NOTICE PLAN

4. The Notice Plan described herein is substantially similar to the Notice Plan previously approved by the Court at the class certification phase and provides for individual direct notice via email, a state-of-the-art media campaign, and updates to the dedicated website and toll-free telephone line where Class Members can learn more about their rights and options pursuant to the terms of the Settlement. In my professional opinion, the Notice Plan described herein is the best practicable notice under the circumstances and fulfills all due process requirements, fully complying with CRC 3.769.

DIRECT NOTICE

5. As previously reported in the Class Certification Notice Plan Declaration, Angeion was provided with a Class List that contained approximately 13,389,330 valid email addresses. The Notice Plan includes sending notice of the Settlement and hearing on approval of the Settlement ("Approval Hearing") via email ("Email Notice") to those validated email addresses, as well as to those individuals who registered to receive future updates about the litigation via the dedicated website. The Email Notice will inform Class Members of their rights and options pursuant to the

terms of the Settlement and will direct Class Members to the dedicated website where they can find additional information about the Settlement.

6. Angeion designs the Email Notice to avoid many common "red flags" that might otherwise cause an email recipient's spam filter to block or identify the Email Notice as spam. For example, Angeion does not include attachments to the Email Notice, because attachments are often interpreted by various Internet Service Providers ("ISP") as spam.

7. Additionally, Angeion strategically staggers the release of emails, starting with a smaller number of emails and gradually increasing the volume of emails sent to a given domain. In our experience, this form of "priming" or "warming up" minimizes the probability of ISPs blocking the Email Notice from being delivered.

8. Angeion also accounts for the practical reality that some emails will inevitably fail to be delivered during the initial delivery attempt. Therefore, after the initial noticing campaign is complete, Angeion, after an approximate 24- to 72-hour rest period (which allows any temporary block at the ISP level to expire) causes 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.

9. At the completion of the Notice Plan, Angeion will report to the Court concerning the number of emails that are not considered successful.

MEDIA NOTICE

10. In addition to the direct notice efforts described above, the Notice Plan provides for a state-of-the-art social media advertising campaign complemented by a paid search campaign. The media notice will mirror the tactics and techniques described in the Class Certification Notice Plan Declaration and will target Android users within the state of California via the social media platforms Facebook and Instagram.

11. A paid search campaign will be utilized to complement the social media notice efforts by helping to drive Class Members who are actively searching for information about the Settlement and litigation to the dedicated website. The media notice efforts are designed to deliver

approximately 1,000,000 impressions (i.e., opportunities to view the advertisements regarding the Settlement).

DEDICATED WEBSITE & TELEPHONE SUPPORT

12. The website devoted to this matter, www.CellularDataClassAction.com, will be updated to include information pertaining to the Settlement, including answers to frequently asked questions, the date and time of the Approval Hearing, and information on how Class Members can object to the Settlement and the deadline by which to do so. Class Members can also submit questions regarding the Settlement to the email address dedicated to this litigation: Info@CellularDataClassAction.com.

13. Likewise, the toll-free line dedicated to this case: 1-844-440-3947, will be updated to provide information pertaining to the Settlement. The toll-free hotline utilizes an interactive voice response ("IVR") system to provide Class Members with responses to frequently asked questions and other essential information regarding the Settlement in both English and Spanish, and will remain accessible 24 hours a day, 7 days a week.

CONCLUSION

14. The Notice Plan outlined above includes direct notice to all reasonably identifiable Class Members via email, combined with state-of-the-art media notice and updates to the dedicated website and toll-free hotline, which further serve to provide Class Members with information about the Settlement and Approval Hearing.

15. It is my professional opinion that the Notice Plan will provide full and proper notice to the Class, and that the Notice Plan is the best notice that is practicable under the circumstances, fully comporting with due process requirements and fully compliant with CRC 3.769.

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

Dated: December 17, 2025

/s/ Steven Weisbrot
STEVEN WEISBROT