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Attorneys for Defendant APPLE INC.

[Additional counsel on signature page.]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

FUMIKO LOPEZ, FUMIKO LOPEZ, as
guardian of A.L., a minor, LISHOMWA
HENRY, JOSEPH HARMS, JOHN TROY
PAPPAS, and DAVID YACUBIAN
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Case No.: 4:19-cv-04577-JSW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND SETTLEMENT
RELATED DEADLINES**

1 Pursuant to Civil Local Rule 6-2, Plaintiffs Fumiko Lopez, Fumiko Lopez, as guardian of
2 A.L., a minor, John Troy Pappas, and David Yacubian (“Plaintiffs”) and Defendant Apple Inc.
3 (“Apple”) (collectively, the “Parties”), through their undersigned counsel, respectfully submit this
4 stipulated request to extend the current settlement-related deadlines by approximately three weeks,
5 for the reasons set forth below:

6 **WHEREAS**, on December 31, 2024, Plaintiffs filed a Motion for Preliminary Approval of
7 Class Action Settlement (ECF No. 336);

8 **WHEREAS**, on February 10, 2025, the Court granted Plaintiffs’ Motion for Preliminary
9 Approval of Class Action Settlement (ECF No. 341);

10 **WHEREAS**, pursuant to the Court’s Preliminary Approval Order (“Order”), Apple shall
11 provide the Settlement Administrator the names and contact information for all members of the
12 Settlement Class for whom it has records by no later than 30 days after entry of the Order, which
13 sets the current deadline as March 12, 2025;

14 **WHEREAS**, while Apple is continuing to work diligently to compile the contact
15 information for all potential members of the Settlement Class to whom notice should be provided,
16 Apple anticipates that it will require additional time to provide that data to the Settlement
17 Administrator, and can do so by no later than March 31, 2025;

18 **WHEREAS**, in light of the requested extension for Apple to provide the contact information
19 for all potential members of the Settlement Class to whom notice should be provided to the
20 Settlement Administrator, the parties have conferred and believe that a modification of the timing
21 requirements in the Order is necessary and appropriate to allow the Court to hold the Final Approval
22 Hearing as scheduled on August 1, 2025. The parties therefore jointly request that the Court enter
23 an order modifying the settlement-related deadlines, as detailed in the table set out below.

24 **WHEREAS**, there have been no prior extensions of settlement-related deadlines.

25 **WHEREAS**, this requested extension is not made for the purpose of delay, promotes judicial
26 efficiency, and will not cause prejudice to the respective Parties and no case management issues or
27 inefficiencies for the Court will arise because of this requested extension.

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties, by and through their respective counsel, and respectfully requested that the following settlement-related deadlines be extended as set forth below:

Event	Current Timing	Current Deadline	Proposed Amended Timing	Proposed Amended Deadline
Apple to provide Settlement Class Member List (“Data Transfer Date”)	No later than thirty (30) days after entry of the Preliminary Approval Order	March 12, 2025	Per Apple’s request, March 31, 2025	March 31, 2025
Notice to the Class commences (“Notice Date”)	No later than forty-five (45) days after Data Transfer Date	April 25, 2025	No later than thirty-three (33) days after Data Transfer Date	May 3, 2025
Deadline to File Class Counsel’s Motion for Attorneys’ Fees and Expenses and Plaintiff’s Request for Service Awards	No later than thirty-five (35) days before Objection and Exclusion Deadline	May 21, 2025	Unchanged	May 28, 2025
Claims Filing Deadline	One hundred thirty-five (135) days after entry of the Preliminary Approval Order (<i>i.e.</i> , sixty (60) days after the Notice Date)	June 25, 2025	At least sixty (60) days after the Notice Date, and same date as Objection and Exclusion Deadline	July 2, 2025

Event	Current Timing	Current Deadline	Proposed Amended Timing	Proposed Amended Deadline
Objection and Exclusion Deadline	At least sixty (60) days after the Notice Date, and same date as Claim Filing Deadline	June 25, 2025	Unchanged	July 2, 2025
Deadline to file Motion for Final Approval of the Settlement	No later than thirty-five (35) days before Final Approval Hearing	June 27, 2025	Unchanged	June 27, 2025
Deadline to File Opt-Out List and Settlement Administrator Declaration concerning Notice and Opt-Outs	No later than thirty-five (35) days before Final Approval Hearing	June 27, 2025	No later than twenty-five (25) days before Final Approval Hearing	July 7, 2025
Deadline to File Oppositions to Objections/Reply Memorandum in Support of Motions	No later than seven (7) days prior to the Final Approval Hearing	July 25, 2025	Unchanged	July 25, 2025
Final Approval Hearing	--	August 1, 2025 at 9:00 a.m. PT	Unchanged	August 1, 2025 at 9:00 a.m. PT

Dated: March 6, 2025

Respectfully submitted:

By:

/s/ Erin Green Comite

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27
28

[PROPOSED] ORDER

The above STIPULATION AND [PROPOSED] ORDER TO EXTEND SETTLEMENT RELATED DEADLINES is approved and all Parties shall comply with its provisions.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

HON. JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE

ATTESTATION

I, Alexis Amezcua, am the CM/ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order to Extend Settlement Related Deadlines. Pursuant to Local Civil Rule 5-1(i)(3), I hereby attest that Erin Comite, on whose behalf this filing is jointly submitted, has concurred in this filing.

Dated: March 6, 2025

/s/ Alexis A. Amezcua
ALEXIS A. AMEZCUA