

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

A court authorized this Notice. This is not a solicitation from a lawyer.

If you owned or purchased a Siri-enabled device and experienced an unintended Siri activation during a confidential or private communication between September 17, 2014 and December 31, 2024, you should read this Notice as it may impact your legal rights

- A settlement has been reached with Apple Inc. (“Apple”) in a class action lawsuit brought on behalf of current or former owners or purchasers of a Siri-enabled iPhone, iPad, Apple Watch, MacBook, iMac, HomePod, iPod touch, or Apple TV (“Siri Device/Devices”) whose confidential or private communications were allegedly obtained by Apple and/or shared with third parties as a result of an unintended Siri activation. Apple denies all of the allegations made in the lawsuit and denies that Apple did anything improper or unlawful.
- The Settlement provides for a \$95 million fund for payments to Settlement Class Members who are individual current or former owners or purchasers of a Siri Device, who reside in the United States or its territories, and whose confidential communications were obtained by Apple and/or were shared with third parties as a result of an unintended Siri activation. The Settlement Class excludes Apple; any entity in which Apple has a controlling interest; Apple’s directors, officers, and employees; Apple’s legal representatives, successors, and assigns. Also excluded from the Settlement Class are all judicial officers assigned to this case as well as their staff and immediate families. The Class Period is September 17, 2014 to December 31, 2024.
- If you believe you are a Settlement Class Member, you must submit a valid Claim Form to get a payment from the Settlement. Settlement Class Members may submit claims for up to five Siri Devices on which they claim to have experienced an unintended Siri activation during a conversation intended to be confidential or private. Settlement Class Members who submit valid claims shall receive a pro rata portion of the Net Settlement Amount for a Class Payment of up to a cap of \$20 per Siri Device. The amount available to Settlement Class Members will increase or decrease pro rata depending on the total number of valid claims submitted, and Siri Devices claimed. Depending on the total number of valid claims, this Plan of Allocation is subject to modification by agreement of the Parties without further notice to Settlement Class Members, provided any such modification is approved by the Court. The final amount will not be known until all claims are evaluated. Please see the information in this Notice concerning payments.
- Visit **www.LopezVoiceAssistantSettlement.com** to make a claim. If you received an email or postcard with a Claim Identification Code and a Confirmation Code notifying you about the Settlement, use these codes when making a claim. If you did not receive an email or

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postcard about the Settlement and don't have these codes but believe you are a member of the Settlement Class, you may still make a claim by going to **www.LopezVoiceAssistantSettlement.com** to make a claim and following the instruction on how to submit a Claim Form.

- You can also opt out of or object to the Settlement.
- Your rights are affected whether you act or don't act. Please read this Notice carefully.

<u>SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS</u>		
Option	Explanation	Deadline
Stay in the Settlement Class, File a Claim Form, and Receive a Payment	<p>If you receive an email or postcard notifying you that you may be a member of the Settlement Class, or you believe that you are a member of the Settlement Class, you must submit a valid Claim Form to receive a Class Payment.</p> <p>The Claim Form requires that you confirm or update your current contact information and confirm the following under oath: from September 17, 2014 to December 31, 2024 (i) you purchased or owned a Siri Device in the United States or its territories and enabled Siri on that device, (ii) you experienced an unintended Siri activation, and (iii) the unintended Siri activation occurred during a conversation intended to be confidential or private. You may submit a Claim Form for up to five Siri Devices.</p> <p>This is the only way to get a payment.</p> <p>By receiving a payment, Settlement Class Members will give up rights and be bound by the Settlement.</p>	JULY 2, 2025
Exclude Yourself	<p>Get no payment.</p> <p>This is the only option that allows you to keep your right to bring any other claim against Apple arising out of or related to the claims in this case.</p>	JULY 2, 2025

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Comment On or Object to the Settlement and/or Attend a Hearing	<p>You can write to the Court about why you like or do not like the Settlement.</p> <p>You cannot ask the Court to order a larger settlement.</p>	JULY 2, 2025
Do Nothing	Give up rights and be bound by the Settlement.	

- These rights and options – **and the deadlines to exercise them** – are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved.

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BASIC INFORMATION

1. Why did I get this Notice?

A court authorized this Notice because owners and purchasers of Siri Devices have the right to know about a legal settlement. If you qualify as a Settlement Class Member, you can get a payment.

To find out if you qualify, see Questions 5-6 below.

This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

Judge Jeffrey S. White of the United States District Court for the Northern District of California is in charge of this case and will decide whether to approve the Settlement. The case is entitled *Lopez et al. v. Apple Inc.*, Case No. 4:19-cv-04577 (N.D. Cal.). **PLEASE DO NOT CALL THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT.**

If you have questions about the Settlement, you can visit the website **www.LopezVoiceAssistantSettlement.com**, call toll-free 1-888-981-4106 or write to the Settlement Administrator at the address below for more information.

Lopez Voice Assistant Settlement Administrator
P.O. Box 6609
614 Cranbury Rd
East Brunswick, NJ 08816

2. What is this lawsuit about?

Plaintiffs alleged that confidential or private communications by current or former owners or purchasers of Siri Devices were obtained by Apple and/or shared with third parties as a result of an unintended Siri activation, and brought claims including alleged violation of consumer protection laws and privacy laws. Apple denies all of the allegations made in the lawsuit and denies that Apple did anything improper or unlawful. Apple asserts numerous defenses to the claims in this case. The proposed settlement to resolve this case is not an admission of guilt or wrongdoing of any kind by Apple.

3. What is a class action?

In a class action, one or more individuals and/or entities called "class representatives" sue on behalf of themselves and other individuals and/or entities who have similar claims. This group of individuals and/or entities is called the "class," and the individuals and/or entities in the class are called "class members." One court resolves the issues for all class members, except for people who exclude themselves from the class.

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4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or Apple. Instead, both sides agreed to a Settlement. That way, they avoid the costs and risks of a trial, and the allegedly affected Settlement Class Members can get benefits or compensation. The class representatives and their attorneys think the Settlement is best for the Class.

WHO IS IN THE SETTLEMENT?

5. Who is in the Settlement?

The Settlement Class includes all individual current or former owners or purchasers of a Siri Device, who reside in the United States or its territories, whose confidential or private communications were obtained by Apple and/or were shared with third parties as a result of an unintended Siri activation. The Settlement Class excludes Apple; any entity in which Apple has a controlling interest; Apple's directors, officers and employees; Apple's legal representatives, successors, and assigns; and judicial officers assigned to this case and their staff and immediate families. The Class Period is September 17, 2014 to December 31, 2024.

6. What should I do if I am still not sure whether I am included?

If you are still not sure whether you are included in the Settlement Class, you can visit the website **www.LopezVoiceAssistantSettlement.com**, call toll-free 1-888-981-4106, or write to the Settlement Administrator at the address below for more information.

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THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

Apple will pay \$95 million into a settlement fund. After deduction of the costs of notice and settlement administration, taxes, any award of attorneys' fees, litigation costs, and any Service Awards for the Class Representatives, the Net Settlement Amount will be distributed to Settlement Class Members in accordance with a plan of allocation that accounts for the number of valid claims submitted by the Settlement Class Members. The plan of allocation is described in detail in the Settlement Agreement available at **www.LopezVoiceAssistantSettlement.com**.

We will not know the final amounts until the Settlement Administrator determines the total number of eligible Settlement Class Members who submitted valid claims.

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8. Who can get money from the Settlement, and how much?

Settlement Class Members must submit a valid Claim Form to receive payment from the Settlement. Settlement Class Members who submit valid claims shall receive a pro rata portion of the Net Settlement Amount for a Class Payment of up to a cap of \$20 per Siri Device. The amount available to Settlement Class Members will increase or decrease pro rata depending on the total number of valid claims submitted, and Siri Devices claimed. Depending on the total number of valid claims, this Plan of Allocation is subject to modification by agreement of the Parties without further notice to Settlement Class Members, provided any such modification is approved by the Court. The final amount will not be known until all claims are evaluated. The plan of allocation is described in detail in the Settlement Agreement available at www.LopezVoiceAssistantSettlement.com.

9. What am I giving up if I stay in the Class?

Unless you exclude yourself with an opt-out request (*see* Question 16), you cannot sue, continue to sue, or be part of any other lawsuit against Apple arising out of or related to the claims in this case. The “Releases” section in the Settlement Agreement describes the legal claims that you give up if you remain a Settlement Class Member. The Settlement Agreement can be viewed at www.LopezVoiceAssistantSettlement.com.

HOW TO GET A PAYMENT

10. How can I get a payment?

In order to receive a payment, you must complete and submit a valid Claim Form by **July 2, 2025**. You can submit claims for up to five Siri Devices. The Claim Form requires that you confirm or update your current contact information and confirm the following under oath: from September 17, 2014 to December 31, 2024 (i) you purchased or owned Siri Device in the United States or its territories and enabled Siri on that device, (ii) you experienced an unintended Siri activation, and (iii) the unintended Siri activation you experienced occurred during a conversation intended to be confidential or private.

- You can access the Claim Form on www.LopezVoiceAssistantSettlement.com. If you received an email or postcard with a Claim ID number notifying you about the Settlement, use your Claimant Identification Code and Confirmation Code when making a claim. If you did not receive an email or postcard about the Settlement and don’t have a Claim ID, but believe you are a member of the Settlement Class, you may still make a claim by going to www.LopezVoiceAssistantSettlement.com and following the instructions on how to submit a Claim Form. You may elect to receive payment by physical check, electronic check, or Automated Clearing House (“ACH,” a/k/a direct deposit). If you do not complete and submit a valid Claim Form, you will not receive a payment.

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11. When will I get my payment?

The Court will hold a hearing on **August 1, 2025, at 9:00 a.m.** (the “Final Approval Hearing”), to decide whether to approve the Settlement. The Court may move the Final Approval Hearing to a different date or time without providing further Notice to the Class. The date and time of the Final Approval Hearing can be confirmed at **www.LopezVoiceAssistantSettlement.com**. If the Settlement is approved, there may be appeals. The appeal process can take time. If there is no appeal, your settlement benefit will be processed promptly. Please be patient.

Updates regarding the Settlement and when payments will be made will be posted at **www.LopezVoiceAssistantSettlement.com**.

12. How can I verify or update my mailing address?

See Question 10, above.

THE LAWYERS REPRESENTING THE CLASS

13. Do I have a lawyer in the case?

Yes. The Court appointed Christian Levis of Lowey Dannenberg, P.C. and Erin Green Comite Scott + Scott Attorneys at Law LLP to represent you and the other Class Members. These firms are called Class Counsel. You will not be charged for their services.

14. Should I get my own lawyer?

You do not need to hire your own lawyer, as Class Counsel is working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer’s services. For example, you can ask your own lawyer to appear in Court if you want someone other than Class Counsel to speak for you. You may also appear for yourself without a lawyer.

15. How will the lawyers be paid?

Plaintiffs’ Counsel will ask the Court for an award of attorneys’ fees of up to 30% of the Settlement Fund, litigation expenses of up to \$1,100,000, and Service Awards to the Class Representatives of up to \$10,000 each. The Court will determine these amounts. All of these amounts, as well as the costs associated with notice and administering the Settlement, will be paid from the Settlement Fund.

A copy of Plaintiffs’ Counsel’s Motion for Attorneys’ Fees and Expenses and for Class Representative Service Awards will be available at **www.LopezVoiceAssistantSettlement.com** by May 28, 2025.

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EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from the Settlement and you want to keep your right, if any, to sue Apple on your own about the legal issues in this case, then you must take steps to get out of the Settlement. This is called excluding yourself from – or “opting out” of – the Settlement Class.

16. How do I get out of the Settlement?

You may opt out of the Settlement by mailing your Request for Exclusion to the Claims Administrator at

Lopez Voice Assistant Settlement Administrator
Attn: Exclusions
P.O. Box 6609
614 Cranbury Rd
East Brunswick, NJ 08816

Your Request for Exclusion must:

- Include your full name, address, and telephone number;
- Include case name and number: *Lopez et al. v. Apple Inc.*, Case No. 4:19-cv-04577 (N.D. Cal.);
- Include information sufficient to verify that you are a member of the Settlement Class (which may include any codes provided by the Settlement Administrator or any email address associated with your Siri Devices);
- Be personally signed and dated by you; and
- Contain a clear request that you would like to “opt out” or be excluded, by use of those or other words clearly indicating a desire not to participate in the Settlement.

Opt-out requests must be postmarked no later than July 2, 2025.

17. If I don’t opt out, can I sue Apple for the same thing later?

No. Unless you opt out, you give up the right to bring any other claim against Apple arising out of or related to the claims in this case. You must exclude yourself from the Class if you want to try to pursue your own lawsuit.

18. What happens if I opt out?

If you opt out of the Settlement, you will not have any rights as a member of the Settlement Class under the Settlement; you will not receive any payment as part of the Settlement; you will not be bound by any further orders or judgments in this case; and you will keep the right, if any, to sue on any claims against Apple arising out of or related to the claims in this case at your own expense. If a Settlement Class Member submits both a Claim Form and a timely request for exclusion, the exclusion shall take precedence and be considered valid and binding unless it is withdrawn.

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OBJECTING TO THE SETTLEMENT

19. How do I tell the Court if I do not like the Settlement?

If you are a member of the Settlement Class and do not opt out of the Settlement, you can ask the Court to deny approval of the Settlement by filing an objection. You can also object to the requested award of attorneys' fees and expenses to Plaintiffs' Counsel or Service Awards to the Class Representatives. The Court will consider your views. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no settlement payments will be sent out, and the lawsuit will continue. If that is what you want to happen, you must object.

Any objection to the proposed Settlement must be in writing. If you file a timely written objection, you may (but are not required to) appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

To object, you must file a document with the Court saying that you object to the proposed Settlement in *Lopez et al. v. Apple Inc.*, Case No. 4:19-cv-04577 (N.D. Cal.). Be sure to include:

- Your full name, mailing address, telephone number, email address, and signature. If you are represented by counsel, you must include your counsel's name, mailing address, email address, and telephone number.
- The case name and number: *Lopez et al. v. Apple Inc.*, Case No. 4:19-cv-04577 (N.D. Cal.).
- Information sufficient to verify that you are a member of the Settlement Class (which may include any codes provided by the Settlement Administrator or any email address associated with your Siri Devices).
- A detailed statement of your objection, including all the grounds for the objection together with any evidence that you think supports it.
- A statement whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class.
- A list of all cases in which you or your counsel have filed an objection within the past five years.
- A statement whether you or your counsel intends to speak at the Final Approval Hearing.

You can file the objection electronically at <https://ecf.cand.uscourts.gov/>, file the objection in person at any location of the United States District Court for the Northern District of California, or mail the objection by First Class U.S. Mail, so that it is submitted electronically or postmarked no later than July 2, 2025, to the following address:

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WWW.LOPEZVOICEASSISTANTSETTLEMENT.COM**

Clerk of Court
U.S. District Court for the Northern District of California
450 Golden Gate Avenue
Box 36060
San Francisco, CA 94102
Case No. 4:19-cv-04577-JSW

If you do not mail or electronically file the objection, you must have it delivered in person to the above address no later than July 2, 2025.

20. What is the difference between objection and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and telling the Court that you do not want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because it no longer affects you. You cannot both opt out and object to the Settlement.

THE COURT'S FINAL APPROVAL HEARING

21. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing on **August 1, 2025, at 9:00 a.m.** at the United States District Court for the Northern District of California, Oakland Courthouse, 1301 Clay Street, Courtroom 5 – 2nd Floor, Oakland, CA 94612.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to Settlement Class Members who have asked to speak at the hearing.

The Court may also decide how much Class Counsel should receive in attorneys' fees and expense reimbursements and the Class Representatives should receive in Service Awards. After the hearing, the Court will decide whether to approve the Settlement.

The Court may reschedule the Final Approval Hearing or change any of the deadlines described in this Notice. The date of the Final Approval Hearing may change without further notice to Class Members. Be sure to check the website, **www.LopezVoiceAssistantSettlement.com**, for news of any such changes. You can also access the case docket via the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>.

22. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you send an objection, you do not have to come to the hearing to talk

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about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but that is not necessary.

23. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must include a statement in your written objection (*see* Question 19) that you intend to appear at the hearing. Be sure to include your name, address, and signature as well.

You cannot speak at the hearing if you exclude yourself from the Class.

IF I DO NOTHING

24. What happens if I do nothing at all?

If you are a Class Member and you do nothing, you will not be eligible to receive a Class Payment. However, you will still be bound by the Settlement. That is, you will not receive a payment, but you will give up the rights explained in Question 9, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Apple related to the Lawsuit or for claims that in any way are related to the subject matter of the claims in this Lawsuit.

GETTING MORE INFORMATION

25. Are more details about the Settlement available?

Yes. This Notice summarizes the proposed Settlement – more details are in the Settlement Agreement and other case documents. You can get a copy of these and other documents at **www.LopezVoiceAssistantSettlement.com** or by accessing the docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California at any of the Court's locations between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

PLEASE DO NOT CALL THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT.

26. How do I get more information?

The website, **www.LopezVoiceAssistantSettlement.com**, has answers to questions about the Settlement, and other information to help you determine whether you are eligible for a payment.

You can either call or write to the Claims Administrator at:

Lopez Voice Assistant Settlement Administrator
P.O. Box 6609
614 Cranbury Rd
East Brunswick, NJ 08816

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WWW.LOPEZVOICEASSISTANTSETTLEMENT.COM**

1-888-981-4106

Class Counsel can be reached using the following contact information:

Christian Levis
LOWEY DANNENBERG, P.C.
44 South Broadway, Suite 1100
White Plains, NY 10601
Telephone: (914) 733-7205
Facsimile: (914) 997-0035

LopezVoiceAssistantSettlement@lowey.com

Erin Green Comite
SCOTT+SCOTT ATTORNEYS AT LAW LLP
The Helmsley Building
230 Park Avenue, 24th Floor
New York, NY 10169-1820
Telephone: (212) 223-6444
Facsimile: (212) 223-6334
lopezsettlement@scott-scott.com

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