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

ANIBAL RODRIGUEZ, JULIAN
SANTIAGO, and SUSAN LYNN HARVEY
individually and on behalf of all other
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688-RS

**DECLARATION OF ANIBAL
RODRIGUEZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR FEES,
COSTS, AND SERVICE AWARDS**

Judge: Hon. Richard Seeborg
Courtroom 3 – 17th Floor

DECLARATION OF ANIBAL RODRIGUEZ

Pursuant to 28 U.S.C. § 1746, I, Anibal Rodriguez, hereby declare as follows:

1. My name is Anibal Rodriguez. I am over eighteen years of age and am competent to testify to and have personal knowledge of the facts set forth herein.

2. I am one of the class representatives appointed in the Court’s class certification order in this lawsuit against Google, LLC. (“Google”).

3. I provided a declaration in support of Plaintiffs’ motion for class certification (Dkt. 315-7), and I am now providing this declaration in support of the judgment achieved in this case.

4. I understand that the Court certified nationwide classes for monetary relief under Rule 23(b)(3) and injunctive relief under Rule 23(b)(2), and that after some post-certification briefing to clarify the scope of those classes, the Court ultimately certified the following classes for monetary relief under Rule 23(b)(3) for the invasion of privacy and intrusion upon seclusion claims:

Class 1: All “non-Enterprise” and “non-Unicorn” individuals who, during the period beginning July 1, 2016 and continuing through the present (the “Class Period”), (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase Software Development Kit (“SDK”) and/or Google Mobile Ads SDK.

Class 2: All “non-Enterprise” and “non-Unicorn” individuals who, during the Class Period (a) had their “Web & App Activity” and/or “supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

5. I also understand that the following classes were certified under Rule 23(b)(3) for the CDAFA claim, as well as under Rule 23(b)(2) for all claims:

Class 1 is the “Android Class” and consists of all individuals who, during the period beginning July 1, 2016 and continuing through September 23, 2024, (a) had their “Web & App Activity” and/or “Supplemental Web & App Activity” setting turned off and (b) whose activity on a non-Google-branded mobile app was still transmitted to Google, from (c) a mobile device running the Android operating system, because of the Firebase Software Development Kit (“SDK”) and/or Google Mobile Ads SDK.

Class 2 is the “Non-Android Class” and consists of all individuals who, during the period beginning July 1, 2016 and continuing through September 23, 2024, (a) had their “Web & App Activity” and/or “Supplemental Web & App Activity” setting turned off and (b)

1 whose activity on a non-Google-branded mobile app was still transmitted to Google, from
2 (c) a mobile device running a non-Android operating system, because of the Firebase
Software Development Kit (“SDK”) and/or Google Mobile Ads SDK.

3 6. As a named plaintiff and class representative in this action, I understand that I have
4 a duty to protect the interests of the classes, and I have at all times acted consistent with that duty
5 and for the benefit of the classes.

6 7. I am not aware of anything that has in any way limited my ability to adequately
7 represent the interests of the classes and members of the classes or any interests that conflict in
8 any way with the interests of the classes and members of the classes. I have not been promised
9 any compensation for bringing this case or serving as a class representative.

10 8. I understand that I am a member of Class 1 for all claims because I turned WAA
11 and sWAA off but Google still collected my (s)WAA-off Data on non-Google-branded mobile
12 apps from my Android mobile devices. Although I thought that Google would not collect, save,
13 or use any (s)WAA-off Data when I had turned off WAA and sWAA, I now know that Google
14 still collects, saves, and uses my (s)WAA-off Data without my consent.

15 9. I have been and continue to be willing to do what is necessary to protect the
16 interests of the members of the classes. I have retained lawyers who have experience in class
17 action litigation. I have discussed this case with my lawyers on numerous occasions, and reviewed
18 pleadings before they were filed.

19 10. I have responded to numerous written discovery requests from Google, including
20 8 interrogatories, 42 requests for production, and 41 requests for admission which, cumulatively
21 in this case, required many days of my attention and work to fulfill. This included working with
22 my lawyers to identify potential sources, searching for and gathering potentially responsive
23 documents, and reviewing and providing input on the responses to Google’s discovery requests.

24 11. My personal devices were also imaged so that account information, settings, and
25 other data could be retrieved. I also allowed Google to pull information from my account that is
26 sensitive and confidential to me, like my Google subscriber information. I also helped gather
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1 information from my device (with the help of my lawyers and experts) to submit to Google to help
2 understand how Google’s collection, storage, and use of sWAA-off Data works.

3 12. I provided a full day of deposition testimony for this case on October 16, 2022. In
4 preparation for that deposition, I met many times with my lawyers in the weeks and days leading
5 up to the deposition, which was time I ordinarily would have spent on other professional and
6 personal matters.

7 13. My participation in this case was difficult, including because the discovery efforts
8 described above exposed parts of my life that I would have liked to keep private. However, I
9 accepted that tradeoff for the privilege of representing these classes and seeking relief that holds
10 Google accountable, and I am honored to have helped secure the relief provided by the judgement
11 achieved after trial in this case.

12 14. I am familiar with the claims that have been asserted in the case and have remained
13 apprised of the strategy employed in this litigation. I have remained committed to staying up to
14 date on additional developments in this case by continuing to confer with my attorneys on a regular
15 basis, including motions practice that occurred after the Court certified the classes. This included
16 periodically meeting with my attorneys to discuss strategy for summary judgment and trial, as
17 well as the mediation sessions that occurred in this case after the Court denied Google’s motion
18 for summary judgment. My attorneys discussed with me the strategies, progress, and results of
19 these motions and mediation sessions.

20 15. In August 2025, I traveled from Hartford, Connecticut to San Francisco, California
21 to prepare for and attend trial. This was a difficult burden on my family and me. First and
22 foremost, I was away and not able to carry out my usual duties in my personal life. Additionally,
23 in the weeks leading up to the trial I found new employment. However, my new employment
24 required intense training, which I would have had to perform during the scheduled trial days. This
25 potential new employer worked with me and pushed my start date back so that I could attend a
26 different training cycle, but I was not able to earn income during the interim because I was focused
27 on my duties and obligations as a class representative, which included working with my lawyers
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1 to prepare for trial. Unfortunately, because of the time I devoted to this important trial, I ultimately
2 was not able to begin that employment. That preparation included many meetings before and
3 during trial to ensure that the classes were represented as well as possible.

4 16. I am aware that there are attorneys' fees and costs involved in representing classes,
5 and I have arranged with my attorneys that they will seek recovery of those attorneys' fees and
6 costs from the common fund established as a result of the judgment.

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

8 Executed on March 30, 2026.

9 /s/ Anibal Rodriguez
10 ANIBAL RODRIGUEZ

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