UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No.: 20-cv-04688-RS

DECLARATION OF CAMERON R. AZARI, ESQ. REGARDING OBJECTIONS NOT FILED WITH THE COURT

I, Cameron R. Azari, Esq., declare as follows:

1. My name is Cameron R. Azari. The facts in this declaration are based on my personal knowledge, as well as information provided to me by my colleagues in the ordinary course of my business.

2. I am a nationally recognized expert in the field of legal notice, and I have served as an expert in hundreds of federal and state cases involving class action notice plans.

3. I am a Senior Vice President of Epiq Class Action & Claims Solutions, Inc. ("Epiq") and the Managing Director of Epiq Legal Noticing (aka Hilsoft Notifications), a business unit of Epiq that specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal notification plan. Epiq and Epiq Legal Noticing will hereinafter be referred to as "Epiq."

4. On May 31, 2024, the Court in its *Order Granting Plaintiffs' Motion to Direct Notice to the Certified Classes* appointed Hilsoft Notifications and myself as the class notice administrator. I have filed multiple declarations in this matter, which describe my experience and expertise and provide other information about notice processes. *See* Dkt. 370-1 (Mar. 7, 2024) (regarding plan to notify class members of class certification); Dkt. 395-3 (Apr. 26, 2024) (regarding amended plan to

notify class members of class certification); Dkt. 465 (Mar. 20, 2025) (regarding successful completion of notification of class certification) ("Implementation Declaration"); Dkt. 468 (Apr. 2, 2025) (regarding updated settlement administration statistics for exclusion requests and Amended Exclusion Report) ("Supplemental Implementation Declaration"); and Dkt. 729-1 (Mar. 23, 2026) (regarding the Fee Application Notice Plan) ("Fee Application Notice Plan Declaration").

OBJECTIONS

5. As the Court approved class administrator, Epiq has received 32 objection-related documents that have *not* been filed on the Court's Docket as of the date of this declaration. The 32 objection-related documents are included as **Exhibits 1-32**.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August, 18, 2026.

Cameron R. Azari, Esq.

Exhibit 1

[YOUR FULL NAME]

[YOUR MAILING ADDRESS]

[CITY, STATE, ZIP CODE]

[YOUR PHONE NUMBER]

[YOUR EMAIL ADDRESS]

Date: ______________________

Clerk of the Court

United States District Court

Northern District of California

Phillip Burton Federal Building

450 Golden Gate Avenue

San Francisco, CA 94102

Re: Objection to Class Counsel's Fee Application in *Rodriguez v. Google,* Case No. 3:20-CV-4688-RS

To the Honorable Court:

I am a Class Member in the above-referenced action and write to formally object to the Fee Application filed by Class Counsel in Rodriguez v. Google, Case No. 3:20-CV-4688-RS. I object to the requested attorneys' fees of 33% of the total judgment (approximately $145 million) on the grounds currently set forth.

I. The Requested 33% Fee Substantially Exceeds the Ninth Circuit Benchmark

The Ninth Circuit has long established that 25% of a common fund is the appropriate benchmark for attorneys' fees in class action settlements. See In re Bluetooth Headset Products Liability Litigation, 654 F.3d 935, 942 (9th Cir. 2011); Powers v. Eichen, 229 F.3d 1249, 1256 (9th Cir. 2000). Class Counsel's request for 33% departs significantly upward from this benchmark and the burden falls on counsel to justify that departure with extraordinary circumstances. No such extraordinary circumstances exist here.

A 33% fee on a judgment of over $440 million yields approximately $145 million in attorney compensation. This amount is unconscionable when measured against the actual recovery per class member, which will be a small fraction of what each affected user is owed for years of unauthorized data collection.

II. The Fee Request Is Disproportionate to the Work Performed and the Results Obtained

Under Federal Rule of Civil Procedure 23(h) and the factors articulated in Vizcaino v. Microsoft Corp., 290 F.3d 1043 (9th Cir. 2002), this Court must evaluate the reasonableness of any fee request by examining, among other factors: (1) the results achieved; (2) the risk of litigation; (3) the skill required and the quality of work; (4) the contingent nature of the fee; and (5) awards in similar cases.

The results obtained here, while presented as a victory, are in fact woefully inadequate. Google is one of the largest and most profitable corporations in human history. A $425 million verdict, even with interest, represents a fraction of a single day's revenue for Google's parent company. Google's annual revenues exceed $300 billion. The judgment in this case, divided among millions of class members, will likely yield only a few dollars per affected user, while counsel walks away with hundreds of millions of dollars. This is not a victory for the Class. It is, at best, a symbolic gesture, and at worst, a quiet settlement of one of the most serious privacy violations in modern history.

The disparity is staggering: Class Counsel seeks $145 million in fees for representing class members who will receive, on average, pocket change. This ratio is inherently unjust and turns the class action mechanism on its head. The class action procedure exists to vindicate the rights of ordinary people who have been wronged by powerful actors. It does not exist as a vehicle for attorneys to extract enormous sums while the actual victims receive token compensation.

III. The Underlying Judgment Itself Is Inadequate to Deter Future Misconduct

While the question of the judgment amount is largely behind us, I write to express that the relatively modest sanction against Google compounds the injustice of an inflated fee award. Google is a near-monopoly in search, advertising, and mobile operating systems. It violated the privacy of tens of millions of Americans who had explicitly turned off tracking — meaning these users took deliberate action to protect their data, and Google ignored those preferences. A judgment of $440 million does not meaningfully deter such conduct from a company of Google's size and resources. It is, in practical terms, a rounding error on Google's balance sheet.

When the company that committed the wrong faces no meaningful financial consequence, and the attorneys who litigated the case extract the lion's share of the recovery, the American people are entitled to ask: who exactly does this system serve?

IV. Public Confidence in the Civil Justice System Is at Stake

This case is being watched. Tens of millions of Americans were notified that their privacy was violated by Google. They have been told a federal jury vindicated their rights. If this case concludes with attorneys collecting $145 million, the class representatives collecting $135,000, and the actual victims receiving a few dollars each, the message sent to the public is unmistakable: the civil justice system does not work for ordinary people. It works for lawyers and for corporations who can afford to absorb the cost of breaking the law.

Public faith in the institutions that govern this country is already strained. Americans are increasingly concerned that the system is captured by the wealthy and the well-connected, and that giant technology corporations operate with effective impunity. This Court has an opportunity to push back against that perception. By reducing the requested fee to a more reasonable percentage — at or below the Ninth Circuit's 25% benchmark, and ideally lower given the size of the fund — this Court can demonstrate that the civil justice system still serves the people it was designed to protect.

V. The Notice of This Proceeding Was Filtered into Spam Folders by the Very Defendant Whose Conduct Is at Issue

I write separately to raise a serious procedural concern regarding the adequacy of notice in this proceeding. The court-ordered Notice of Class Action that informed me of Class Counsel's Fee Application and my right to object was delivered to my Gmail spam/junk folder, not my inbox. Gmail is, of course, owned and operated by the defendant in this action, Google LLC.

This was not an isolated incident. I have personally confirmed with multiple friends, family members, and professional colleagues — all of whom are likely Class Members — that the same Notice was routed to their spam or junk folders on their personal and professional Gmail accounts. Many were unaware they had received the Notice at all until I prompted them to check their spam folders. I have no doubt that countless other Class Members never discovered the Notice and have lost the opportunity to object or otherwise participate in this proceeding.

This presents an obvious and troubling conflict of interest. Federal Rule of Civil Procedure 23(c)(2)(B) requires that class members receive "the best notice that is practicable under the circumstances." When the defendant in a class action also controls the email infrastructure through which notice is delivered, and that infrastructure systematically filters the notice away from class members' inboxes, the resulting notice is plainly not the best practicable under the circumstances. Google — the party with the greatest interest in suppressing awareness of this case — effectively controlled whether millions of Class Members would ever see the Notice at all.

This benefits Google in two concrete ways: (1) fewer Class Members are aware of the verdict, the judgment, and the privacy violations Google was found to have committed, which limits the reputational damage Google would otherwise suffer; and (2) fewer Class Members will be positioned to make claims if and when funds are ultimately distributed, leaving more residual money on the table. Neither outcome is acceptable, and neither is consistent with the due process protections that class actions are designed to provide.

Accordingly, I respectfully urge the Court to take the following corrective measures: (a) extend the deadline to object to the Fee Application and any other deadlines tied to the current notice; (b) require Google to ensure, through technical means within its sole control, that any future court-ordered notices in this matter are delivered directly to Class Members' inboxes and not routed to spam, junk, promotions, or other secondary folders on Gmail or any other Google-operated service; and (c) require Google itself — as the party best positioned to ensure deliverability on its own platform — to be a sender of record on future notices, so that Class Members see clearly that the company found liable is the company informing them of their rights. A notice from "Google" that lands in a Class Member's inbox is more honest, more visible, and more likely to restore public confidence than the current arrangement, in which a third-party administrator's email is silently quarantined by Google's own filters.

VI. Requested Relief

For the foregoing reasons, I respectfully request that this Court:

1. Deny Class Counsel's request for 33% of the judgment as excessive and contrary to Ninth Circuit precedent;
2. Award a fee at or below the Ninth Circuit's 25% benchmark, with downward adjustment appropriate given the size of the common fund and the modest per-class-member recovery;
3. Scrutinize the requested $12,422,374.42 in costs and expenses to ensure each line item is reasonable and necessary;
4. Direct that any reduction in attorneys' fees be redistributed to the Class;
5. Extend the deadline for objections to the Fee Application in light of the demonstrated notice failure described in Section V; and
6. Order Google to take affirmative technical steps — including whitelisting court-ordered notices on Gmail and any other Google-operated email service — to ensure that all future notices in this matter are delivered directly to Class Members' inboxes, and require Google itself to be identified as a sender of record on any such future notices.

VII. Required Disclosures

Pursuant to the requirements set forth in the Court-ordered Notice, I provide the following information:

Full Name: [YOUR FULL NAME]

Mailing Address: [YOUR FULL MAILING ADDRESS]

Telephone Number: [YOUR PHONE NUMBER]

Email Address: [YOUR EMAIL ADDRESS]

Lawyers Retained for This Objection: None. Pro Se. I am appearing Pro Se and am submitting this objection on my own behalf, without legal representation. No attorney, current or former, has been retained or will be paid in any capacity in connection with this objection.

Respectfully submitted,

____

[YOUR PRINTED FULL NAME]

Objector, Pro Se

Date: ______________________

Outlook

Pathetic: Class Member Objection

From [redacted]
Date Thu 5/28/2026 10:11 AM
To Mark C. Mao <[redacted]>; Beko Richardson <[redacted]>
Cc Jordan Bergsten <[redacted]>; Julia Bront <[redacted]>; Reed Forbush <[redacted]>; Tatiana Nikolaeva <[redacted]>; Ted Uno <[redacted]>; Andrew Villacastin <[redacted]

1 attachment (19 KB)
Objection_to_Fee_Application_Rodriguez_v_Google [Template].docx;

CAUTION : External email. Please do not respond to or click on links/attachments unless you recognize the sender.

Mr. Mao and Mr. Reblitz-Richardson,

I have cc'ed most of your organization in this email as well as blind cc'ed a few integrity journalist.

I am a class member in the recent google case (I don't even want to specify the case or use my gmail out of fear of google filtering this email out of inboxes). I am writing to express my contempt for how this case was litigated and the fee application you have now filed.

Let's talk about the numbers, because the numbers are embarrassing.

Google's market capitalization is approximately $4.71 trillion. The verdict you secured — and that you are now triumphantly pointing to in your fee request — is $425 million, or roughly $440 million with interest. That figure represents less than one one-hundredth of one percent (0.0093%) of Google's market value. Google generates that much revenue in roughly half a day. For a company found liable by a federal jury for systematically violating the privacy of tens of millions of Americans who explicitly turned off tracking, your "win " is a rounding error. Google will pay it out of petty cash and the executives responsible will not lose a minute of sleep.

Now let's talk about what should have been on the table. The class here numbers in the tens of millions — likely 70 to 100 million Americans or more, based on Android and iOS market share over the certified class period. Statutory damages under the California Invasion of Privacy Act alone run to $5,000 per violation. Even setting statutory damages aside and pricing this as a basic privacy tort, comparable settlements imply per-class-member damages between $500 and $1,500. At even the conservative end, that yields a true value of $35 to $50 billion. At the realistic end, with punitive multipliers reflecting the deliberate nature of Google's conduct, the case was worth somewhere between $75 and $150 billion. Google could pay $50 billion tomorrow and remain one of the most valuable companies on earth.

Instead of changing the the lives of your entire staff and positively impacting society, you settled for roughly half a percent of what this case was actually worth, and you are now pathetically excited to take 33% of that diminished number for yourselves. You appear to be celebrating $145 million in fees as a career-defining outcome. It isn't. It is a reflection of how little ambition you brought to a case against a defendant whose pockets are effectively bottomless.

Here is what is genuinely confounding about your strategy: a lower fee percentage on a larger settlement would have been better for you on every dimension that matters. Imagine you had secured even $50 billion for the class. A 15% fee on that recovery is $7.5 billion — more than fifty times what you are now grasping at — and you would have been the firms that brought Big Tech to its knees. Instead, you will be remembered, if you are remembered at all, as the firms that let Google off cheap and then took an outsized cut of the scraps. Your reputations would have been built by going harder. They will be defined by how visibly you didn't.

You had an opportunity to make this case mean something. To send a message that mass privacy violations carry real consequences. To deter the next round of corporate surveillance. You settled for a paycheck.

This email is my objection registered directly to you. A formal written objection to your fee application has been filed with the Court and served on you in accordance with the notice procedures (see attached draft).

[redacted]
Class Member & Pro Se Objector

Exhibit 2

[redacted]

Date: May 25, 2026

Clerk of the Court
United States District Court
Northern District of California
Phillip Burton Federal Building
450 Golden Gate Avenue
San Francisco, CA 94102

Re: Objection to Fee Application
Rodriguez v. Google
Case No. 3:20-CV-4688-RS

To the Court:

I am a Class Member, or potential Class Member as identified in the notice I received, in Rodriguez v. Google, Case No. 3:20-CV-4688-RS. I received notice regarding Class Counsel's Fee Application, and I respectfully submit this written objection to the requested attorneys' fees, expenses, and service awards.

I do not object to Class Counsel receiving reasonable compensation for the work performed in this case. I understand this was significant litigation that resulted in a jury verdict in favor of the Classes. However, I object to the requested attorneys' fees of 33% of the judgment, including interest, because that percentage appears excessive and should be carefully reviewed by the Court before approval.

As I understand it, Class Counsel is requesting attorneys' fees equal to 33% of the judgment, including both the jury verdict and continuing interest, plus $12,422,374.42 in costs and expenses, and $135,000.00 in total service awards for the three class representatives. Because these amounts will reduce, or may reduce, the compensation ultimately available to Class Members, I ask the Court to closely scrutinize the request.

My objection is based on the following concerns:

1. The requested 33% fee appears to exceed the commonly referenced 25% benchmark used in percentage-of-recovery class action fee awards in the Ninth Circuit.
2. I am concerned that calculating attorneys' fees on both the jury verdict and continuing interest may further reduce the amount available to Class Members.
3. I ask the Court to conduct a careful lodestar cross-check and determine whether the requested percentage would create a windfall compared with the actual time, labor, risk, and results achieved.
4. I ask the Court to carefully review the requested $12,422,374.42 in costs and expenses to ensure they are adequately documented, reasonable, and necessary.

5. I ask the Court to carefully review the requested $135,000.00 in service awards and determine whether those awards are reasonable in light of the recovery available to ordinary Class Members.

I respectfully request that the Court reduce the requested attorneys' fee percentage to an amount the Court finds reasonable, including consideration of the Ninth Circuit's 25% benchmark, and ensure that any approved fees, expenses, and service awards are fair to the Classes as a whole.

I have not hired any attorney to represent me for this objection. No current or former lawyer has been retained by me or will be paid by me in connection with this objection.

I declare under penalty of perjury that the information above is true and correct to the best of my knowledge.

[redacted]

Date: May 25, 2026

CERTIFICATE OF SERVICE

I, [redacted] certify that on May 25, 2026, I mailed true and correct copies of my Objection to Fee Application in Rodriguez v. Google, Case No. 3:20-CV-4688-RS, by U.S. Mail to the following:

Court:

Clerk of the Court
United States District Court
Northern District of California
Phillip Burton Federal Building
450 Golden Gate Avenue
San Francisco, CA 94102

Class Counsel:

Mark C. Mao
Beko Reblitz-Richardson
BOIES SCHILLER FLEXNER LLP
44 Montgomery St., 41st Floor
San Francisco, CA 94104

Notice Administrator:

Rodriguez v. Google Notice Administrator
PO Box 2749
Portland, OR 97208-2749

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

Executed on May 25, 2026, at Concord, California.

[redacted]

[redacted]

CERTIFIED MAIL

[redacted]

Retail

UNITED STATES POSTAL SERVICE

RDC 99

[redacted]

UNITED STATES POSTAL SERVICE®

CERTIFIED MAIL®

FOR USE ONLY WITH IMpb SHIPPING LABEL

Rodriquez vs Google Notice Administrator
P.O. Box 2749
Portland, OR 97208-2749

[redacted]

Exhibit 3

May 25, 2026

To the Class Counsel and Notice Administrator:

I'm writing to object to the Fee Application in *Rodriguez v. Google*, Case No. 3:20-CV-4688-RS.

My name is [redacted]

My address is: [redacted] (and was several other addresses that may be on record for the period in question)

The reason for my objection is that these fees do not fairly represent the legal costs incurred, the time/effort involved and the value these lawyers have delivered to the class.

I have not hired a lawyer regarding this objection.

Thanks in advance for your consideration of this objection.

Sincerely,

[redacted]

[redacted]

[redacted]

Notice Administrator
P.O. Box 2749
Portland, OR 97208-2749

[redacted]

Exhibit 4

May 25, 2026 2:07pm

[redacted]

Reason for my Objection, and any legal Support:

① Lack of transparency

② Inadequate benefit to the class member (myself)

This includes the following lawyers:

Mark C. Mao
Beko Reblitz-Richardson
BOIES SCHILLER FLEXNER LLP
44 Montgomery St., 41st Floor
San Fransisco, CA 94104

James Lee
BOIES SCHILLER FLEXNER LLP
100 SE 2nd St., 28th Floor
Miami, FL 33131

John A. Yanchunis
Ryan J. McGee
Morgan & Morgan
201 N. Franklin St.
7th Floor
Tampa, FL 33602

Bill Carmody
SUSMAN GODFREY LLP
One Manhattan West
50^{th} floor
New York, NY 10001

Amanda Bonn
SUSAN GODFREY LLP
1900 Ave. of the Stars,
Suite 1400
Los Angeles, CA 90067

Objector:
[redacted]

p2 of 2

[redacted]

[redacted]

Notice Administrator
PO Box 2749
Portland, OR 97208-2749

[redacted]

Exhibit 5

[redacted]

OBJECT TO ANY FEE.

ITs EXTORTION.

[redacted]

THE LAWYERS TOOK 34%

THEY CAN Pay any FEE.

RICH NAZIS. EXTORTION LAWYERS.

I WON AWARD BY LAW NOT THE LAWYERS,

Its A Crime to EXTORT FEES.

WHEN THEY TOOK 34%. AlREADY.

[redacted]

6-2-26

SUBJECT:

Google Wed & App Activity.

Class Counsels FEE App

[redacted]

[redacted]

Notice ADMIN.
P.O. Box 2749
Portland, OR. 97208-2749

Google Web & App Act.
Class Counsel's FEE App [redacted]

Exhibit 6

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

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

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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

Hon. Richard Seeborg

Hearing: August 13, 2026, 1:30 p.m., Courtroom 3

OBJECTION OF CLASS MEMBER KATHERINE ELKINS TO CLASS COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS (DKT. 739)

I. Identification of Objecting Class Member

I, [redacted] am a member of the certified Classes in the above-captioned action. I submit this Objection to Class Counsel's Motion for an Award of Attorneys' Fees, Costs, and Service Awards (Dkt. 739) pursuant to the procedures set forth in the Court-Ordered Notice of Class Action dated May 27, 2026.

My contact information is as follows:

[redacted]

I have not retained counsel for purposes of this Objection. No attorney has been hired or compensated, in any form or for any reason, in connection with the preparation or filing of this Objection. I appear pro se.

I file this Objection in writing only and do not request to appear at the fairness hearing.

II. Summary of Objections

I object to five components of Class Counsel's Fee Application. First, the requested 33% attorneys' fee is not supported by the California authority Class Counsel relies upon at the scale presented here. The cited cases involve common funds and settlements far smaller than this $440 million-plus judgment, and neither California law nor Ninth Circuit law treats a one-third percentage as presumptively reasonable in a megafund case.

Second, the lodestar cross-check should not be accepted at face value. Class Counsel's disclosed lodestar of $56,768,654 and 49,670 hours imply a blended hourly rate of approximately $1,143.

The requested fee of $146,781,895.13 divided by those hours yields effective compensation of approximately $2,955 per attorney-hour. That result warrants close scrutiny under the proportionality principles articulated by the Ninth Circuit in Lowery v. Rhapsody International, Inc., 75 F.4th 985 (9th Cir. 2023).

Third, the fee should be measured against the actual relief obtained for the class: a damages judgment, no punitive damages, no disgorgement, and no injunction. The class is enormous, reportedly approximately 98 million users and 174 million devices, making the realistically anticipated per-user or per-device recovery only a few dollars after fees, costs, and service awards.

Fourth, the requested fee should not automatically compound with post-judgment interest. Post-judgment interest compensates the class for delay in receiving the judgment; applying the same percentage to interest accruing during post-trial and appellate proceedings should require separate equitable analysis.

Fifth, the cost reimbursement request includes approximately $800,000 in anticipated, not-yet-incurred costs. Reimbursement should ordinarily follow proof of costs actually incurred, not precede it.

III. Class Counsel's California Authorities Do Not Support a 33% Fee at Megafund Scale

Class Counsel argues that California law governs the fee analysis because the prevailing claims, intrusion upon seclusion and invasion of privacy, arise under California law, and that California courts routinely approve attorneys' fees of one-third of the common fund. Proposed Order at 2 (citing Laffitte v. Robert Half International Inc., 1 Cal. 5th 480 (2016); Beaver v. Tarsadia Hotels, 2017 WL 4310707 (S.D. Cal. Sept. 28, 2017); Chavez v. Netflix, Inc., 162 Cal. App. 4th 43 (2008); Oliveira v. Language Line Services, Inc., 767 F. Supp. 3d 984 (N.D. Cal. 2025)). The argument fails on its own terms.

Laffitte involved a $19 million wage-and-hour settlement, approximately one twenty-third the size of the present judgment plus interest. 1 Cal. 5th at 485. The California Supreme Court affirmed a one-third award in that context. It did not adopt a one-third benchmark for all California common-fund cases, and it did not address, much less endorse, a one-third award on a $440 million-plus judgment.

The same is true of Class Counsel's other cited authorities. Chavez did not approve a one-third fee on a cash judgment remotely comparable to this one. Beaver and Oliveira are district-court settlement-fee cases, not binding California Supreme Court authority and not megafund verdict cases. None supports the proposition that a one-third fee is reasonable at this scale.

California law does not contain a blanket rule that one-third is always reasonable. To the contrary, Laffitte emphasized that the trial court must scrutinize the requested percentage for reasonableness, considering the size of the fund, the risks and complexity of the litigation, the skill shown by counsel, the contingent nature of the fee, and awards in similar cases. Id. at 504-06. Lealao v. Beneficial California, Inc., 82 Cal. App. 4th 19 (2000), the foundational California Court of Appeal decision on the percentage method, framed the inquiry as an approximation of what the market would pay for comparable litigation services rendered pursuant to a fee agreement. At megafund scale, a sophisticated market negotiation would not ordinarily yield one-third of the recovery.

The Ninth Circuit's opinion in In re Optical Disk Drive Products Antitrust Litigation, 959 F.3d 922 (9th Cir. 2020), a case decided on appeal from this Court, confirms that megafund size matters and that smaller-case benchmarks are of limited assistance in very large common-fund cases. Optical Disk Drive does not impose a mandatory sliding scale, but it does emphasize the district court's fiduciary duty to scrutinize fee requests and recognizes that percentages tend to decline as fund size increases. Id. at 932-34.

The same megafund logic applies whether the controlling fee framework is federal or state. A one-third fee on $19 million produces approximately $6.3 million; a one-third fee on $440,345,685.40 produces approximately $146.8 million. The work required to obtain a megafund recovery is not mechanically proportional to the size of the fund. Applying the smaller-case one-third percentage at megafund scale therefore risks producing the result that California law's reasonableness mandate is designed to prevent.

IV. The Disclosed Lodestar, Multiplier, and Effective Hourly Rate Warrant Close Scrutiny Under Lowery

Class Counsel has disclosed the following: a lodestar of $56,768,654, total hours of 49,670, and a requested fee of $146,781,895.13, representing a 2.59 multiplier. Proposed Order at 3. The implied blended hourly rate is approximately $1,143 per hour. The requested fee divided by the disclosed hours yields effective compensation of approximately $2,955 per attorney-hour.

The Ninth Circuit in Lowery v. Rhapsody International, Inc., 75 F.4th 985 (9th Cir. 2023), held that a Rule 23 fee award must be reasonably proportional to the benefit actually received, or realistically anticipated to be received, by the class, not to a hypothetical maximum recovery. Id. at 994. The Eighth Circuit recently reached a similar conclusion in In re T-Mobile Customer Data Security Breach Litigation, 111 F.4th 849 (8th Cir. 2024), reversing a 22.5% fee award from a $350 million data-breach settlement where the implied multiplier and effective hourly rate were unreasonable. T-Mobile is not controlling, but it is persuasive authority confirming that courts should scrutinize large fee requests that generate very high effective hourly compensation.

Here, the requested multiplier is lower than the multiplier rejected in T-Mobile, but it is applied to an already premium blended rate of approximately $1,143 per hour. The resulting effective rate of approximately $2,955 per attorney-hour warrants careful review, particularly where the class recovery per user or device is likely to be only a few dollars.

Under Lowery, the Court must look to the actual or realistically anticipated benefit to the class. The certified privacy and intrusion Classes include non-Enterprise, non-Unicorn Google users with mobile devices over an eight-year period. Public reporting describes the class as approximately 98 million users and 174 million devices. Even assuming full collection of the judgment, the net recovery to the class after deduction of the requested fees, costs, and service awards would be approximately $281 million before administration and distribution expenses. Distributed across a class of this size, the per-user or per-device recovery is modest. The Court should examine the disproportion between that per-member benefit and Class Counsel's effective hourly compensation.

In addition, to the extent Class Counsel's lodestar is used as a cross-check supporting a multiplier, the Court should require enough information to evaluate whether the claimed hours and rates reflect work reasonably performed by attorneys at the rates claimed. This includes sufficient disclosure regarding staffing, contract-attorney work, document-review methods, technology-assisted review, and other efficiency tools that may bear on whether the lodestar and multiplier are reasonable. This request is not an accusation of improper conduct; it is a request for the information necessary to make the lodestar cross-check meaningful.

V. The Reasonableness Inquiry Should Reflect the Actual Relief Obtained

Class Counsel argues that an elevated percentage is justified by the substantial risk and expense assumed in litigating this complex case for over five years and trying the case to verdict. Proposed Order at 3. Risk and effort are relevant, but the reasonableness inquiry under Laffitte and Vizcaino also asks whether the result obtained justifies the requested fee. See Laffitte, 1 Cal. 5th at 504-06; Vizcaino v. Microsoft Corp., 290 F.3d 1043, 1048-49 (9th Cir. 2002).

The result obtained is meaningful. A jury awarded damages on the privacy and intrusion claims after trial, and the Court entered judgment. But the fee should still be measured against the actual relief obtained for the class: a damages judgment, no punitive damages, no disgorgement, and no injunction. The Court denied additional equitable relief, and the judgment remains subject to Google's post-trial motions and possible appeal.

A 33% megafund award should not be justified by treating the result as if it captured every form of relief sought or every possible consequence of the alleged conduct. Where the percentage method functions as an approximation of what an informed market would pay ex ante for legal services that produced a particular result, see Lealao, 82 Cal. App. 4th 19, the scope of the actual result matters. The damages judgment is substantial in the aggregate, but the per-member benefit is modest and the relief does not include punitive, disgorgement, or injunctive components. That supports a downward adjustment from the requested one-third fee.

VI. Any Fee on Post-Judgment Interest Should Receive Separate Equitable Analysis

The Proposed Order provides that the fee award will continue to grow with the accrual of post-judgment interest. Proposed Order at 3 n.1. The practical effect is that Class Counsel would receive 33% of all post-judgment interest accruing between the date of judgment and the date of payment, a period that may extend through post-trial motions and appeal.

Post-judgment interest exists to compensate the prevailing party for the time value of money during the period of delayed payment. In a class case, that interest belongs to the class as compensation for delay in receiving the judgment. Class Counsel may of course perform additional work in defending the judgment post-trial and on appeal, but that work can be evaluated separately if and when additional fees are sought. Automatically applying the same 33% percentage to interest that accrues solely because payment is delayed risks transferring part of the class's delay compensation to counsel without separate analysis.

I respectfully request that any percentage fee be calculated on the principal judgment amount as of final judgment, or, at minimum, that the Court separately analyze whether the same percentage should apply to post-judgment interest accruing during post-trial and appellate delay.

VII. The $800,000 in Anticipated, Not-Yet-Incurred Costs Should Be Excluded or Subject to a Specific Accounting Requirement

Class Counsel's $12,422,374.42 cost request includes approximately $800,000 in costs that have not yet been incurred but that Class Counsel anticipates incurring in the future, including costs associated with notice of the Fee Application. Proposed Order at 4 (citing Lee Decl. at 21-22 & n.1). The Proposed Order provides for a clawback if actual future costs are lower.

The customary structure of cost reimbursement is the reverse: counsel submits proof of costs actually incurred, and the court reimburses those costs from the common fund. Awarding prospective costs first and providing for a clawback later places the burden of correction on the class rather than on counsel.

I respectfully request that the Court either (a) defer the $800,000 portion of the cost award pending submission of proof of actual costs incurred, or (b) condition that portion of the award on a specific, time-bound accounting requirement enforceable by the Notice Administrator and subject to Court review.

VIII. Conclusion and Requested Relief

For the foregoing reasons, I respectfully request that the Court:

1. Reduce the attorneys' fee award below 33%, consistent with the megafund nature of the recovery and the principles articulated in Laffitte, Lealao, Optical Disk Drive, and Lowery;
2. Calculate any percentage fee on the principal judgment amount, or separately analyze whether the same percentage should apply to post-judgment interest accruing during post-trial and appellate delay;
3. Require sufficient disclosure regarding staffing, contract-attorney work, document-review methods, technology-assisted review, and other efficiency tools to make the lodestar cross-check meaningful before approving any multiplier;
4. Exclude the approximately $800,000 in anticipated, not-yet-incurred costs from the cost award, or condition that portion of the award on a specific accounting requirement; and
5. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

Dated: ________________, 2026

____

[redacted]

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, I caused a true and correct copy of the foregoing Objection to be served upon Class Counsel and the Notice Administrator at the addresses set forth in the Court-Ordered Notice of Class Action, via United States Mail, postage prepaid:

Mark C. Mao / Beko Reblitz-Richardson
Boies Schiller Flexner LLP

44 Montgomery St., 41st Floor
San Francisco, CA 94104

Rodriguez v. Google Notice Administrator
PO Box 2749
Portland, OR 97208-2749

[redacted]

[redacted]

Retail

UNITED STATES POSTAL SERVICE®

RDC 99

97208

[redacted]

RECEIVED
JUN 02 2026
LEGAL SERVICES

NOTICE ADMINISTRATOR
P.O. BOX 2749
PORTLAND, OR ~~[illegible]~~9
97208 - 2749

[redacted]

Exhibit 7

From: [redacted]

To: Notice Administrator
PO Box 2749
Portland, OR 97208-2749

Re: Objection to Attorneys' Fees in Rodriguez v. Google LLC

To the Noticer Administrator:

I am a member of the Settlement Class in the above-referenced matter. I respectfully submit this letter to **object to the requested award of attorneys' fees.**

1. The requested fees are disproportionate to the benefit received by class members

While Class Counsel seeks a substantial fee award, the **expected individual recovery for class members is minimal**, likely only a few dollars per person. A fee request that consumes a significant portion of the common fund reduces the already modest compensation available to millions of affected users.

2. The fee request appears excessive relative to the complexity and outcome of the case

Although this litigation involved meaningful work, the requested fees appear **disproportionate to the results achieved for the class.** Courts have repeatedly emphasized that fee awards must be reasonable in relation to the actual monetary benefit conferred.

3. The Court should apply heightened scrutiny

Given the size of the class and the limited per-person recovery, I respectfully request that the Court:

- Conduct a **rigorous lodestar cross-check**
- Reduce any multiplier that is not clearly justified
- Ensure that the fee award aligns with the **best interests of the class**, not merely counsel

4. I do not intend to appear at the hearing

I submit this objection in writing and do not plan to appear at the final approval hearing, though I reserve the right to do so if circumstances change.

Thank you for your consideration and for ensuring that the interests of class members are protected.

[redacted]

[redacted]

[redacted]

Notice Administrator
P.O. Box 2749
Portland, OR
[redacted] 97208-2749

Exhibit 8

United States District Court
Northern District of California

Rodriguez v. Google LLC
Case No. 3:20-CV-4688-RS

Objection to Fee Application

I, [redacted] member of the settlement class in this case.

I hereby object to the Fee Application filed in Rodriguez v. Google LLC, Case No. 3:20-CV-4688-RS.

My reasons for objecting are as follows:

1 The requested attorneys' fees appear excessive in comparison to the benefit that settlement class will receive. As for me I will have to pay out of pocket and I do not have the funds to do such a thing. I am barely making it day by day with my bills piling up.

2 The Court should carefully review whether the requested fees are reasonable and proportional to the results obtained for the class.

3 Reducing the fee award would increase the amount available to compensate class members who were affected by the conduct alleged in this case. I respectfully request that the Court deny or reduce the requested attorneys' fees.

Date: 06/[redacted]

Signatur[redacted]

Printed Name: [redacted]

[redacted] [redacted]

Notice Administrator
PO Box 2749
Portland, OR 97208-2749

[redacted]

Exhibit 9

[redacted]

Date: May 29th, 2026

--

Notice Administrator

PO Box 2749

Portland, OR 97208-2749

Re: Objection to Class Counsel's Fee Application in *Rodriguez v. Google,* Case No. 3:20-CV-4688-RS

To the Honorable Court:

I am a Class Member in the above-referenced action and write to formally object to the Fee Application filed by Class Counsel in Rodriguez v. Google, Case No. 3:20-CV-4688-RS. I object to the requested attorneys' fees of 33% of the total judgment (approximately $145 million) on the grounds currently set forth.

I. The Requested 33% Fee Exceeds the Ninth Circuit Benchmark

The Ninth Circuit has long established that 25% of a common fund is the appropriate benchmark for attorneys' fees in class action settlements. See In re Bluetooth Headset Products Liability Litigation, 654 F.3d 935, 942 (9th Cir. 2011); Powers v. Eichen, 229 F.3d 1249, 1256 (9th Cir. 2000). Class Counsel's request for 33% departs significantly upward from this benchmark and the burden falls on counsel to justify that departure with extraordinary circumstances. No such extraordinary circumstances exist here.

A 33% fee on a judgment of over $440 million yields approximately $145 million in attorney compensation. This amount is unconscionable when measured against the actual recovery per class member, which will be a small fraction of what each affected user is owed for years of unauthorized data collection.

II. The Fee Request Is Disproportionate to the Work Performed and the Results Obtained

Under Federal Rule of Civil Procedure 23(h) and the factors articulated in Vizcaino v. Microsoft Corp., 290 F.3d 1043 (9th Cir. 2002), this Court must evaluate the reasonableness of any fee request by examining, among other factors: (1) the results achieved; (2) the risk of litigation; (3) the skill required and the quality of work; (4) the contingent nature of the fee; and (5) awards in similar cases.

The results obtained here, while presented as a victory, are in fact woefully inadequate. Google's annual revenues exceed $300 billion. The judgment in this case, divided among millions of class members, will likely yield only a few dollars per affected user, while counsel walks away with hundreds of millions of dollars. This is not a victory for the Class. It is, at best, a symbolic gesture, and at worst, a quiet settlement of one of the most serious privacy violations in modern history.

The disparity is staggering: Class Counsel seeks $145 million in fees for representing class members who will receive, on average, pocket change. This ratio is inherently unjust and turns the class action mechanism on its head. The class action procedure exists to vindicate the rights of ordinary people who have been wronged by powerful actors. It does not exist as a vehicle for attorneys to extract enormous sums while the actual victims receive token compensation.

III. The Underlying Judgment Itself Is Inadequate to Deter Future Misconduct

While the question of the judgment amount is largely behind us, I write to express that the relatively modest sanction against Google compounds the injustice of an inflated fee award. Google is a near-monopoly in search, advertising, and mobile operating systems. It violated the privacy of tens of millions of Americans who had explicitly turned off tracking — meaning these users took deliberate action to protect their data, and Google ignored those preferences. A judgment of $440 million does not meaningfully deter such conduct from a company of Google's size and resources. It is, in practical terms, a rounding error on Google's balance sheet.

When the company that committed the wrong faces no meaningful financial consequence, and the attorneys who litigated the case extract the lion's share of the recovery, the American people are entitled to ask: who exactly does this system serve?

IV. Public Confidence in the Civil Justice System Is at Stake

This case is being watched. Tens of millions of Americans were notified that their privacy was violated by Google. They have been told a federal jury vindicated their rights. If this case concludes with attorneys collecting $145 million, the class representatives collecting $135,000, and the actual victims receiving a few dollars each, the message sent to the public is unmistakable: the civil justice system does not work for ordinary people. It works for lawyers and for corporations who can afford to absorb the cost of breaking the law.

Public faith in the institutions that govern this country is already strained. Americans are increasingly concerned that the system is captured by the wealthy and the well-connected, and that giant technology corporations operate with effective impunity. This Court has an opportunity to push back against that perception. By reducing the requested fee to a more reasonable percentage — at or below the Ninth Circuit's 25% benchmark, and ideally lower given the size of the fund — this Court can demonstrate that the civil justice system still serves the people it was designed to protect.

V. The Notice of This Proceeding Was Filtered into Spam Folders by the Very Defendant Whose Conduct Is at Issue

I write separately to raise a serious procedural concern regarding the adequacy of notice in this proceeding. The court-ordered Notice of Class Action that informed me of Class Counsel's Fee Application and my right to object was delivered to my Gmail spam/junk folder, not my inbox. Gmail is, of course, owned and operated by the defendant in this action, Google LLC.

This was not an isolated incident. I have personally confirmed with multiple friends, family members, and professional colleagues — all of whom are likely Class Members — that the same Notice was routed to their spam or junk folders on their personal and professional Gmail accounts. Many were unaware they had received the Notice at all until I prompted them to check their spam folders. I have no doubt that countless other Class Members never discovered the Notice and have lost the opportunity to object or otherwise participate in this proceeding.

This presents an obvious and troubling conflict of interest. Federal Rule of Civil Procedure 23(c)(2)(B) requires that class members receive "the best notice that is practicable under the circumstances." When the defendant in a class action also controls the email infrastructure through which notice is delivered, and that infrastructure systematically filters the notice away from class members' inboxes, the resulting notice is plainly not the best practicable under the circumstances. Google — the party with the greatest interest in suppressing awareness of this case — effectively controlled whether millions of Class Members would ever see the Notice at all.

This benefits Google in two concrete ways: (1) fewer Class Members are aware of the verdict, the judgment, and the privacy violations Google was found to have committed, which limits the reputational damage Google would otherwise suffer; and (2) fewer Class Members will be positioned to make claims if and when funds are ultimately distributed, leaving more residual money on the table. Neither outcome is acceptable, and neither is consistent with the due process protections that class actions are designed to provide.

Accordingly, I respectfully urge the Court to take the following corrective measures: (a) extend the deadline to object to the Fee Application and any other deadlines tied to the current notice; (b) require Google to ensure, through technical means within its sole control, that any future court-ordered notices in this matter are delivered directly to Class Members' inboxes and not routed to spam, junk, promotions, or other secondary folders on Gmail or any other Google-operated service; and (c) require Google itself — as the party best positioned to ensure deliverability on its own platform — to be a sender of record on future notices, so that Class Members see clearly that the company found liable is the company informing them of their rights. A notice from "Google" that lands in a Class Member's inbox is more honest, more visible, and more likely to restore public confidence than the current arrangement, in which a third-party administrator's email is silently quarantined by Google's own filters.

VI. Requested Relief

For the foregoing reasons, I respectfully request that this Court:

1. Deny Class Counsel's request for 33% of the judgment as excessive and contrary to Ninth Circuit precedent;
2. Award a fee at or below the Ninth Circuit's 25% benchmark, with downward adjustment appropriate given the size of the common fund and the modest per-class-member recovery;
3. Scrutinize the requested $12,422,374.42 in costs and expenses to ensure each line item is reasonable and necessary;

4. Direct that any reduction in attorneys' fees be redistributed to the Class;

5. Extend the deadline for objections to the Fee Application in light of the demonstrated notice failure described in Section V; and

6. Order Google to take affirmative technical steps — including whitelisting court-ordered notices on Gmail and any other Google-operated email service — to ensure that all future notices in this matter are delivered directly to Class Members' inboxes, and require Google itself to be identified as a sender of record on any such future notices.

VII. Required Disclosures

Pursuant to the requirements set forth in the Court-ordered Notice, I provide the following information:

Full Name: [redacted]

Mailing Address: [redacted]

Telephone Number: [redacted]

Email Address: [redacted]

Lawyers Retained for This Objection: None. Pro Se. I am appearing Pro Se and am submitting this objection on my own behalf, without legal representation. No attorney, current or former, has been retained or will be paid in any capacity in connection with this objection.

Respectfully submitted,

____

[YOUR PRINTED FULL NAME]

Objector, Pro Se

Date: ____________________

[redacted]

[redacted]

Notice Administrator
PO Box 2749
Portland, OR 97208-2749

[redacted]

Exhibit 10

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

[redacted]

v. **GOOGLE LLC, Defendant. Case No.** 3:20-CV-4688-RS

OBJECTION TO CLASS COUNSEL'S FEE AND EXPENSE APPLICATION

I am a Class Member in the above-captioned matter (*Rodriguez v. Google LLC*), as indicated by the notice sent to my email address. I am submitting this written objection *pro se* (representing myself) to contest specific elements of Class Counsel's Fee Application. I have not hired any lawyers to represent me for this objection.

I object to the Fee Application on the following grounds:

1. Incorrect Order of Operations for the Fee Calculation

Class Counsel requests attorneys' fees equal to 33% of the gross judgment before deducting litigation expenses. This significantly reduces the net recovery intended for the actual Class Members who suffered the invasion of privacy.

The equitable and standard "net fund" approach should apply here: all court-approved litigation costs and expenses ($12,422,374.42) must be subtracted from the total judgment *first*. Only after those expenses are taken out should Class Counsel's 33% fee be calculated from the remaining balance. Class Counsel should not receive a baseline premium on the millions of dollars spent conducting the litigation itself.

2. Lack of Transparency and Cost-Control Oversight Regarding Expert Witnesses

Class Counsel has requested a substantial sum of $12,422,374.42 for expense reimbursement, a massive portion of which historically goes toward expert witness fees in technical tracking cases. The current application fails to provide the Class with adequate documentation regarding the following critical points:

- **Authorization:** Who authorized the specific selection and hiring of each expert, and what internal oversight mechanisms were used to monitor their billable hours?
- **Efficacy and Utility:** How effective were these specific experts in contributing directly to the trial's successful jury verdict on the privacy claims, as opposed to overlapping or redundant work?
- **Cost-Efficiency:** What specific effort, competitive bidding, or market benchmarking was put into finding the best price for each expert?

The Class is entitled to proof that Class Counsel exercised strict fiduciary responsibility and actively minimized expenses rather than simply passing uncompetitive vendor rates directly onto the settlement fund.

CONCLUSION

For the reasons stated above, I respectfully request that the Court:

1. Deduct all approved litigation expenses from the judgment *prior* to calculating Class Counsel's 33% fee; and
2. Require Class Counsel to submit a detailed, itemized breakdown proving the authorization, necessity, and cost-minimization efforts applied to all expert witness expenses before any reimbursement is granted.

Dated: May 30, 2026

Respectfully submitted,

[redacted]

[redacted]

[redacted]

Notice Administrator

PO Box 2749

Portland, OR 97208-2749

[redacted]

Exhibit 11

[redacted]

OBJECTION TO THE FEE APPLICATION in the Case:

'Class Members who use Android devices ("Class 1) and to Class Members who use non-Android devices ("Class 2") for invasion of privacy and intrusion upon seclusion'

The Jury found Google liable in this case.

Best regards,

[redacted]

Gmail [redacted]

Court-Ordered Notice of Class Action

1 message

Google Web App Activity Lawsuit <rodriguezvgoogle@e.epiqnotice.com> Wed, May 20, 2026 at 1:51 PM
[redacted]

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Notice to Class Members who had Google "Web & App Activity" control or the "Supplemental Web & App Activity" sub-setting turned off or "paused" of Class Counsel's Fee Application

Para una notificacion en Español, visitar www.GoogleWebAppActivityLawsuit.com.

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

What is this notice about? On September 3, 2025, after a federal trial, the jury concluded that Google unlawfully collected information from certain users of smartphones and tablets who claimed they asked Google not to track their activity on mobile apps. The jury awarded a verdict of over $425 million in damages to two certified Classes. The Court entered a judgment, which requires Google to pay the Classes the amount of the jury's verdict plus interest. As of March 2, 2026, the verdict plus interest totals $440,345,685.40. Interest continues to accrue on that amount. However, Google has asked the Court to vacate the judgment, meaning disregard the jury verdict. Google may also appeal the judgment. There is no money available now, but Court rules require Class Counsel to make a formal request for their fees (their "Fee Application"), should compensation be awarded. This notice is to inform Class Members of the Fee Application and their opportunity to object to it.

What was the lawsuit about? Three Google account holders ("Plaintiffs") filed a class action lawsuit alleging that Google LLC ("Google") unlawfully accessed their devices and data, including app activity data on their mobile devices, even though the Google activity controls called Web & App Activity ("WAA") and/or a sub-setting concerning "Chrome history and activity from sites, apps, and devices that use Google services," sometimes called supplemental Web & App Activity ("sWAA") were turned off or "paused." Plaintiffs alleged Google unlawfully accessed their mobile devices to collect, save, and use the data concerning their activity on non-Google apps that have incorporated certain Google software code into the apps. Plaintiffs have three legal claims: 1) invasion of privacy; 2) intrusion upon seclusion (similar to invasion of privacy); and 3) violation of the Comprehensive Computer Data Access and Fraud Act ("CDAFA"). The jury ruled that Google is liable for invasion of privacy and intrusion upon seclusion, but not for violation of the CDAFA.

You are receiving this Notice because Google's records indicate that you may be a Class Member. You were previously sent notice of the Court's certification of the Classes in this lawsuit in the fall of 2024. This Notice advises you of the jury verdict and judgment that were reached in the lawsuit, Class Counsel's Fee Application, your rights and options at this time, and the deadline to exercise them.

Who is a Class Member? The Court certified two classes to assert claims for invasion of privacy and intrusion upon seclusion. These classes include the following individuals:

Class 1 (the Android Class): All "non-Enterprise" and "non-Unicorn" 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 the Google Mobile Ads SDK.

Class 2 (the Non-Android Class): All "non-Enterprise" and "non-Unicorn" 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 a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

"Enterprise individuals" refers to individuals who only have an "Enterprise" Google Account. An "Enterprise" Google Account is an account managed by an administrator that is designed for end users within an organization, such as businesses, non-profits, and schools. Individuals who have an "Enterprise" Google Account are not part of the certified Classes that claimed invasion of privacy and intrusion upon seclusion unless they also have another Google Account.

"Unicorn individuals" refers to individuals who only have a "Unicorn" Google Account, which is also known as a "supervised Google Account for users under age 13." A "supervised Google account for users under age 13" is an account created for a minor when they are under the age of 13, and which is created and supervised by a parent using Google Family Link. Individuals who have a "Unicorn" Google Account are not part of the certified Classes that claimed invasion of privacy and intrusion upon seclusion unless they also have another Google Account.

What was the verdict? The jury found Google liable to Class Members who use Android devices ("Class 1") and to Class Members who use non-Android devices ("Class 2") for invasion of privacy and intrusion upon seclusion. The jury awarded a total of $425,651,947, of which $247,154,157 is due to Class 1 (Android users) and $178,497,790 is due to Class 2 (non-Android users). These amounts will continue accruing interest as required by law. The jury found Google not liable for violation of the CDAFA. For more information about the verdict, you can visit the Case Website and read the jury's verdict and related motions filed by both Google and the Plaintiffs.

Does the verdict mean money is available now? No money will be distributed at this time. While the jury did award a verdict, Google has asked the Court to vacate the judgment, meaning disregard the jury verdict. Google also may appeal. Class Counsel will continue to pursue the lawsuit against Google. If money or benefits become available at a later date, you will be notified and given instructions on how to make a claim.

What is a Fee Application? In a class action lawsuit like this, the Court decides the amount that Class Counsel will be paid for their work. When a jury awards compensation with a verdict in a class action, the Court requires that Class Counsel make a formal application for the fees Class Counsel believes it should be paid for their work in the lawsuit. Class Counsel must also request reimbursement for any costs and expenses incurred in bringing the lawsuit (such as the cost of expert witnesses and for providing notice to the Classes) and for service awards to the individual plaintiffs who represented class members and took part in the lawsuit. Individual Class Members are given an opportunity to review Class Counsel's fee application and object to any part of it. The Court considers Class Counsel's application and any objections, and the Court decides how much Class Counsel will be paid, how much they will be reimbursed, and what service awards will be granted to the class representatives.

What does the Fee Application Say? Class Counsel is requesting (1) attorneys' fees equal to 33% of the judgment, including both the jury's verdict award and interest, which continues to accrue until Google's challenges to the judgment are resolved; (2) $12,422,374.42 to reimburse costs and expenses incurred by Class Counsel; and (3) a total of $135,000.00 for service awards for the three class representatives. Class Counsel's Fee Application states their justification for each of these requests. The Court must approve the Fee Application and may award less than these amounts. You can review the Fee Application at the Case Website, www.GoogleWebAppActivityLawsuit.com by clicking here. These amounts will be paid from the compensation ultimately awarded in this case, if any. These amounts will not be paid until after the Court rules on Google's request to disregard the jury verdict and, if Google also chooses to appeal, after the Court rules on that appeal. You do not have to pay for Class Counsel or any of their fees and costs.

Who are Class Counsel? The Court has appointed the following lawyers as Class Counsel to represent Class Members.

Mark C. Mao
Beko Reblitz-Richardson
BOIES SCHILLER FLEXNER LLP
44 Montgomery St., 41st Floor
San Francisco, CA 94104

James Lee
BOIES SCHILLER FLEXNER LLP
100 SE 2nd St., 28th Floor
Miami, FL 33131

John A. Yanchunis
Ryan J. McGee
MORGAN & MORGAN
201 N. Franklin Street, 7th Floor
Tampa, FL 33602

Bill Carmody
SUSMAN GODFREY LLP
One Manhattan West
50th Floor
New York, NY 10001

Amanda Bonn
SUSMAN GODFREY LLP
1900 Ave. of the Stars, Suite 1400
Los Angeles, CA 90067

How do I object to the Fee Application? To object, you must file a written objection with the Court. Your objection must state that you object to the Fee Application in *Rodriguez v. Google*, Case No. 3:20-CV-4688-RS and must include the following information:

1. Your full name, mailing address, telephone number, and email address;
2. The reasons for your objection, and any legal support for your objection from you or your lawyer;
3. The name of all lawyers hired to represent you for the objection (if any). This includes any former or current lawyers who may be paid for any reason regarding your objection; and
4. Your signature as the objector. A lawyer's signature is not adequate.

You must file your written objection with the Court so it is *received by* **July 30, 2026**. You must also send your objection to Class Counsel and the Notice Administrator, via US Mail or shipped by private courier (such as Federal Express) so it is *received by* **July 30, 2026**, to the following addresses:

Court	Clerk of the Court United States District Court Northern District of California Phillip Burton Federal Building 450 Golden Gate Avenue San Francisco, CA 94102

Class Counsel	Mark C. Mao Beko Reblitz-Richardson BOIES SCHILLER FLEXNER LLP 44 Montgomery St., 41st Floor San Francisco, CA 94104
Notice Administrator	Notice Administrator PO Box 2749 Portland, OR 97208-2749

How do I get more information? Learn more about the lawsuit at www.GoogleWebAppActivityLawsuit.com or call 1-855-822-8821.

You may also obtain information regarding the lawsuit on the Court docket in this lawsuit, for a fee, 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, Phillip Burton Federal Building & United States Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS LAWSUIT. ALL QUESTIONS SHOULD BE DIRECTED TO THE NOTICE ADMINISTRATOR OR CLASS COUNSEL.

If [redacted] should not be subscribed or if you need to change your subscription information for Rodriguez v Google LLC, please use this preferences page.

AM656 v.02

[redacted]

[redacted]

NOTICE ADMINISTRATOR
PO BOX 2749
Portland, OR, 97028-2479

Exhibit 12

May 22, 2026

Mark C. Mao
Beko Reblitz-Richardson
Boies Schiller Flex, LLC
44 Montgomery St., 41st Floor
San Francisco, CA 94104

RE: Rodriguez v. Google
#3:20-CV-4688-RS

Dear Sir,

I am objecting to the Fee Application in Rodriguez v. Google 3:20-CV-4688-RS. I did nothing wrong, Google did.

[redacted]

Thank You

cc: Clerk of US District, Northern California
Notice Administration

[redacted]

[redacted]

Mark C. Mao
Beko Reblitz-Richardson
Boies Schiller Flexner LLC
44 Montgomery St, 41st Floor
San Francisco, CA 94104

[redacted]

Exhibit 13

Rodriguez v. Google LLC, Case No. 3:20-cv-04688-RS (N.D. Cal.)
Hon. Richard Seeborg

OBJECTION TO CLASS COUNSEL'S FEE APPLICATION

I. Objector Information

I, [redacted] submit this objection to Class Counsel's Fee Application in *Rodriguez v. Google LLC*, Case No. 3:20-cv-04688-RS.

My contact information is:

- **Name:** [redacted]
- **Address:** [redacted]
- **Telephone:** [redacted]
- **Email:** [redacted]

I am a member of the certified Classes. As the Notice states:

> "You are receiving this Notice because Google's records indicate that you may be a Class Member."

I am not represented by counsel for purposes of this objection.

II. Scope of Objection

I object to:

1. Class Counsel's request for 33% of the judgment, including interest;
2. Class Counsel's request for $12,422,374.42 in costs and expenses; and
3. Any service awards to the extent they rely on the same reasoning used to justify the fee request.

The Notice states:

> "Class Counsel is requesting (1) attorneys' fees equal to 33% of the judgment... (2) $12,422,374.42 to reimburse costs and expenses... and (3) a total of $135,000.00 for service awards..."

As of March 2, 2026, the judgment totals $440,345,685.40, and interest continues to accrue.

A 33% fee would exceed $145 million, before adding more than $12 million in expenses.
This is not reasonable under Ninth Circuit precedent.

III. Ninth Circuit Legal Standard

The Ninth Circuit uses the percentage-of-the-fund method with a 25% benchmark.
See *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1047 (9th Cir. 2002).

Courts must:

- Start from the 25% benchmark;
- Adjust upward or downward based on specific factors;
- Conduct a lodestar cross-check to avoid windfalls;
- Act as a fiduciary for absent class members.
  See *In re Washington Pub. Power Supply Sys. Sec. Litig.*, 19 F.3d 1291, 1302 (9th Cir. 1994).

The Ninth Circuit repeatedly warns that large ("mega-fund") recoveries require downward adjustments. See:

- *In re Bluetooth Headset Prods. Liab. Litig.*, 654 F.3d 935 (9th Cir. 2011)
- *In re Online DVD-Rental Antitrust Litig.*, 779 F.3d 934 (9th Cir. 2015)
- *In re Optical Disk Drive Prods. Antitrust Litig.*, 959 F.3d 922 (9th Cir. 2020)
- *Six Mexican Workers v. Ariz. Citrus Growers*, 904 F.2d 1301 (9th Cir. 1990)

IV. Why This Case Does *Not* Justify a 33% Fee

A. This case lacks the extraordinary procedural history that justified higher percentages in *Vizcaino*

In *Vizcaino*, the Ninth Circuit upheld a 28% fee only after emphasizing:

- Plaintiffs lost twice in district court;
- The case was revived twice on appeal;
- Litigation lasted over a decade;
- Counsel faced extraordinary risk of total loss.

None of that is true here.

This case:

- Was filed in 2020;
- Was certified in 2024;
- Went to trial in 2025;
- Reached a verdict in 2025;
- Has not been dismissed, decertified, or reversed;
- Has not involved multiple appeals;
- Has not lasted a decade;
- Has not involved novel legal theories comparable to *Vizcaino*.

The Ninth Circuit has never approved a 33% fee in a case with a procedural history this ordinary.

B. The class cutoff date confirms the litigation was not unusually long or risky.

The Notice states:

> "The Classes include individuals from July 1, 2016, through September 23, 2024."

This confirms:

- The alleged conduct spans eight years,
- But the litigation itself spans only four years,
- And could not possibly involve the decade-long procedural odyssey seen in *Vizcaino*.

This weighs strongly against any upward adjustment.

C. The risk profile here was ordinary, not extraordinary

The Ninth Circuit considers risk of non-payment a key factor.
But here:

- The defendant is Google, one of the most solvent companies in the world;
- The claims (invasion of privacy and intrusion upon seclusion) are well-established torts;
- The jury found liability on two of three claims;
- The case did not involve novel antitrust or securities theories;
- There was no realistic risk of zero recovery.

This is not the kind of case where a high percentage is justified.

D. The Ninth Circuit requires downward adjustments in mega-fund cases

This is a mega-fund case: $440 million, plus accruing interest.

The Ninth Circuit has repeatedly held that:

> "As the size of the fund increases, the percentage awarded should decrease." See *Six Mexican Workers*, 904 F.2d at 1311.

Typical mega-fund awards are 15–20%, not 33%.

E. The disparity between class recovery and counsel's recovery is extreme

Given the enormous class size, individual class members will likely receive only a few dollars.

Meanwhile, Class Counsel seeks:

- $145+ million in fees,
- $12.4 million in expenses,
- $135,000 in service awards.

The Ninth Circuit warns against situations where:

> "Class counsel are paid disproportionately high fees while the class receives only coupons or non-cash relief." See *Bluetooth*, 654 F.3d at 947.

While this case involves cash, the functional disparity is the same.

V. Lodestar Cross-Check

The Court should require:

1. Detailed time records;
2. Reasonable hourly rates;
3. A lodestar calculation;
4. A multiplier analysis.

In *Vizcaino*, the Ninth Circuit noted that multipliers of 1.0 to 4.0 are typical. A 33% fee here would almost certainly produce a far higher multiplier, which Ninth Circuit precedent disfavors.

VI. Costs and Expenses

Class Counsel seeks $12,422,374.42 in expenses.

The Court should require:

- Itemized documentation;
- Exclusion of overhead;
- Elimination of duplicative charges across firms.

Given the size of the fee request, strict scrutiny is warranted.

VII. Service Awards

I do not oppose reasonable service awards. However, the Court should ensure they are:

- Modest,
- Justified, and
- Not tied to any improper incentive arrangements.

See *Rodriguez v. West Publ'g Corp.*, 563 F.3d 948, 959–60 (9th Cir. 2009).

VIII. Requested Relief

For the reasons above, I respectfully request that the Court:

1. *Deny* the request for 33% of the judgment;
2. Apply the 25% benchmark and adjust downward in light of the mega-fund nature of the case;
3. Conduct a lodestar cross-check;
4. Scrutinize the $12,422,374.42 in expenses;
5. Ensure service awards are modest and justified.

Respectfully submitted

[redacted]

May 21, 2026

[redacted]

[redacted]

Notice Administrator
PO Box 2749
Portland, OR 97208-2749

[redacted]

Exhibit 14

[redacted]

To Whom it May Concern,

I, [redacted] formally contest the fee application in Google's data breach to protect our payout from being significantly depleted by excessive attorney fees. This letter is written to protect the money that should be distributed to affect users.

My objection requests the judge to be proportional to the actual benefit provided to the class. Lawyers should be rewarded for their success rather than simply dragging out litigation to generate massive legal fees.

Sincerely,

[redacted]

[redacted]

[redacted]

Notice Administration
PO Box 2749
Portland, OR 97208-2749

[redacted]

Exhibit 15

[redacted]

To Whom it May Concern,

I, [redacted] formally contest the fee application in Google's data breach to protect the victims' rights to the settlement amounts. US citizens should feel confident in our judicial system at all ranks and levels of business size.

Sincerely,

[redacted]

Exhibit 16

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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

Hon. Richard Seeborg, Chief Judge

CLASS MEMBER OBJECTION TO CLASS COUNSEL'S MOTION FOR ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS

I. INTRODUCTION AND CLASS MEMBER STATUS

[redacted] a Class Member in the above-captioned action, respectfully submits this Objection to Class Counsel's Motion for Attorneys' Fees, Costs, and Service Awards. This Objection is timely submitted in accordance with the Court's notice to Class Members, which establishes July 30, 2026 as the deadline to object.

Objector [redacted] is a Class Member who, during the period of July 1, 2016 through September 23, 2024, had her Web & App Activity and/or supplemental Web & App Activity setting turned off or paused, and whose activity on non-Google-branded mobile apps was nonetheless transmitted to Google through the Firebase SDK and/or Google Mobile Ads SDK. As such, Objector falls within the certified Class 1 and/or Class 2 definitions for violations of the California Comprehensive Computer Data Access and Fraud Act (CDAFA), invasion of privacy, and intrusion upon seclusion.

II. OBJECTION TO PREMATURE FEE AWARD

Class Counsel seeks an award of approximately $147 million in attorneys' fees — roughly one-third of the $440 million verdict — at a time when no money has been paid to any Class Member and no money is available. The Court should not award fees until the case reaches actual finality for the following reasons:

1. **Google's motion to vacate the verdict remains pending.** Google has asked this Court to disregard the jury's $425 million verdict. If that motion is granted, there would be no recovery, no common fund, and no basis to award fees. Awarding fees now, before that motion is resolved, is premature and potentially wasteful of Class Members' anticipated recovery.

2. **No class member has received any benefit.** The touchstone of a fee award in a common fund case is the benefit actually conferred upon the class. At present, Class Members have received nothing — no money, no injunctive relief, no claim form, and no timeline for distribution. Awarding fees before Class Members receive any tangible benefit inverts the proper relationship between Class Counsel's compensation and the class's recovery.

3. **Google may appeal.** The case website confirms that Google may also appeal the judgment. Years of appellate proceedings could follow. Locking in a $147 million fee award during this uncertainty is not in Class Members' interests.

III. OBJECTION TO THE AMOUNT OF THE REQUESTED FEE

Even if a fee award were appropriate at this stage, the requested amount is excessive under the circumstances.

4. **The fee percentage should not be fixed against the full verdict before any reduction.** Google's pending motion to vacate and any potential appeal create serious downside risk to the total recovery. If Class Counsel's fee is set now as a percentage of the current verdict amount, and the verdict is subsequently reduced or reversed, Class Members will have borne disproportionate risk.

5. **Approximately $147 million in fees from a class of roughly 98 million accounts means attorneys are paid more per account than each individual class member is likely to recover.** This disproportion warrants heightened scrutiny. The Court should require Class Counsel to demonstrate that the fee is reasonable in light of the actual per-class-member benefit, not just the gross verdict.

6. **Service awards to named plaintiffs should also be deferred.** For the same reasons that a fee award is premature, any service awards to the named class representatives should await the resolution of Google's motion and any appeal.

IV. REQUESTED RELIEF

For the foregoing reasons, Objector [redacted]espectfully requests that the Court:

(a) Deny Class Counsel's Motion for Attorneys' Fees, Costs, and Service Awards without prejudice, and defer any fee award until Google's motion to vacate the jury verdict is resolved and any appeal is exhausted or waived;

(b) If the Court is inclined to award fees at this stage, reduce the percentage to one that better reflects the contingency that Class Members have not yet received any benefit; and

(c) Require Class Counsel to provide a supplemental submission at the time of any actual distribution showing the per-class-member benefit actually achieved, against which the reasonableness of any fee can be measured.

Respectfully submitted,

[redacted]

[redacted]
Class Member / Objector
[redacted]

Date: June 6, 2026

CERTIFICATE OF SERVICE

I, [redacted] certify that on **June 6**, 2026, I served a true and correct copy of this Objection by U.S. Mail or private courier, postmarked or delivered so as to be received by July 30, 2026, to the following:

The Court (original):

Clerk of the Court
United States District Court, Northern District of California
450 Golden Gate Avenue
San Francisco, CA 94102
Re: Case No. 3:20-cv-04688-RS

[redacted]

[redacted]

Mark C. Mao / Beko Reblitz-Richardson
Boies Schiller Flexner LLP
44 Montgomery St. 41st Floor
San Francisco, CA 94104

94104-481541

Exhibit 17

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Case Name: Rodriguez v. Google LLC **Case No.:** 3:20-CV-4688-RS

CLASS MEMBER'S WRITTEN OBJECTION TO CLASS COUNSEL'S FEE APPLICATION

I am writing to formally object to the Fee Application submitted by Class Counsel in the above-captioned matter. As a potential Class Member who received notice of this lawsuit, I submit the following information and objections for the Court's consideration:

I. Objector Information

- **Full Name:** [redacted]
- **Mailing Address:** [redacted]
- **Telephone Number:** [redacted]
- **Email Address:** [redacted]

II. Statement of Representation

I am submitting this objection on my own behalf. I have not hired or retained any former or current lawyers to represent me for the purpose of making this objection, and no lawyers will be paid for any reason regarding this objection.

III. Grounds for Objection to the Fee Application

I object to Class Counsel's request for attorneys' fees equal to 33% of the total judgment (which currently exceeds $440 million including interest), in addition to over $12.4 million in expenses.

While I appreciate the work Class Counsel put into achieving a favorable jury verdict, a 33% fee award from a fund of this massive scale is excessive and disproportionate. In class action settlements and verdicts of this magnitude, the "benchmark" for attorneys' fees in the Ninth Circuit is typically 25%. When a common fund reaches hundreds of millions of dollars, courts often apply a "sliding scale" or "percentage-of-the-fund" reduction to prevent a windfall to the attorneys at the expense of the class members.

Allowing Class Counsel to take nearly one-third of the entire recovery significantly depletes the remaining funds that should rightfully be distributed to the millions of everyday users whose privacy was unlawfully invaded. I request that the Court apply a more reasonable benchmark or a sliding-scale reduction to ensure that the Class Members receive the primary benefit of the jury's verdict.

IV. Conclusion

For the reasons stated above, I respectfully request that the Court review Class Counsel's Fee Application with strict scrutiny and reduce the requested percentage to better serve the interests of the certified Classes.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I am a member of the Class(es) certified in this action.

Dated: May 27th, 2026

Signature of Objector: [redacted]

[redacted]

[redacted]

Notice Administrator
PO Box 2749
Portland, OR 97208-2749

97208-274949

Exhibit 18

Notice Administrator 6-13-26

Rodriguez v. Google LLC

Objection to Fees + costs.

Plaintiff on S.S.D.I.
Android class 1

Claims -
- Invasion of privacy
Intrusion ~~of~~ upon seclusion
violation of comprehensive
computer data access and
Fraud Act <CDAFA>

[redacted]

[redacted]

[redacted]

Notice Administrator
PO BOX 2749
Portland, OR 97208-
2749

[redacted]

Exhibit 19

June 6, 2026

Name: [redacted]
Address
phone:
email:

Dear Sirs,

Google's lawyers should not receive their requested application fee nor any other compensation for their involvement with this federal trial.

Google was found guilty of unlawful collection of information which includes deceiving users who thought that by turning of the phone's ability to be tracked, collection of information had been prevented.

This fee application should be denied.

Sincerely,

[redacted]

[redacted]

[redacted]

Notice Administrator
PO BOX 2749
Portland, OR 97208-2749

[redacted]

Exhibit 20

June 14, 2026

Notice Administrator

PO Box 2749

Portland, OR 97208-2749

To: Administrator

From: [redacted]

Re: *Rodriguez v. Google*, Case No. 3:20-CV-4688-RS

1. Name: [redacted]
   Mailing Address: [redacted]
   Cellphone [redacted]
   Email: [redacted]

2. I am objecting to the fee application and any legal support for your objection from the class action council below:

Mark C. Mao
Beko Reblitz-Richardson
BOIES SCHILLER FLEXNER LLP
44 Montgomery St., 41st Floor
San Francisco, CA 94104

John A. Yanchunis
Ryan J. McGee
MORGAN & MORGAN
201 N. Franklin Street, 7th Floor
Tampa, FL 33602

Bill Carmody
SUSMAN GODFREY LLP
One Manhattan West
50th Floor
New York, NY 10001

Amanda Bonn
SUSMAN GODFREY LLP
1900 Ave. of the Stars,

James Lee
BOIES SCHILLER
FLEXNER LLP
100 SE 2nd St., 28th Floor
Miami, FL 33131

Suite 1400
Los Angeles, CA 90067

[redacted]

[redacted]

[redacted]

Notice of Administrator
P.O Box 2749
Portland, OR 97206-2749

[redacted]

Exhibit 21

[redacted]

00142715200000011
Mark C. Mao
Beko Reblitz-Richardson BOIES SCHILLER FLEXNER LLP
44 Montgomery St
41st Floor
San Francisco CA 94104
USA

Dear Class Counsel for

Rodriguez v. Google LLC

Case No. 20-cv-4688-RS (N.D. Cal.),

I believe I am a class member. I wish to file a Fee A
The email address affected is [redacted]

I prefer a respond at [redacted] wi
instructions or requests for additional information to
filing of my Fee Application.

Thank you,

[redacted]

[redacted]

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE
PAID
LETTERSTREAM

00142715200000011
Mark C. Mao
Beko Reblitz-Richardson BOIES SCHILLER F
44 Montgomery St
41st Floor
San Francisco CA 94104
USA

[redacted]

Exhibit 22

To: Notice Administrator : Rodriguez V. google
Notice Administrator
P.O. Box 2749
Portland, OR 97208-2749

From:
Name: [redacted]
Address:
Phone :
Email :

Rodriguez V. google, Case No: 3:20-CV-04688-RS
Objection to fee application submitted

Dear Sir,

I purchased an oppo reno 12F phone with google services on 15/12/20
My previous phone was an iphone 8 plus bought from the U.S.A and the sim card was a myanmar sim card No: [redacted].

From July 1, 2016 - 23/10/2024, I turned off the web and app activity setting on my iphone (Factory reset) on 7/6/2026, and I also turned off the oppo reno 12F. I also did not deny invasion of privacy and intrusion upon seclusion. I apologise, I did not know this would be a problem.

Class councel said that this [redacted]) was sent about me. I don't know who it is. I would like to object to the fee application that must be paid by July 30, 2026. I am not suing Google. I'm apologise and do nothing. I don't need to get payment. Don't sue me, google, please, I don't know, I didn't ask for anything from google. I am writing this letter from an unknown person with the [redacted], claiming to be a member. Who is he?

Please reduce fee application for one device US$3.

I reset of the oppo reno 12F and I bought a Huawei nova Y73 on 14/6/202

Thank you Sir, [redacted]

[redacted]

From: [redacted]

Notice Administrator: Rodriguez V. Google
Notice Administrator
P.O. Box 2749
Portland, OR 97208-2749

[redacted]

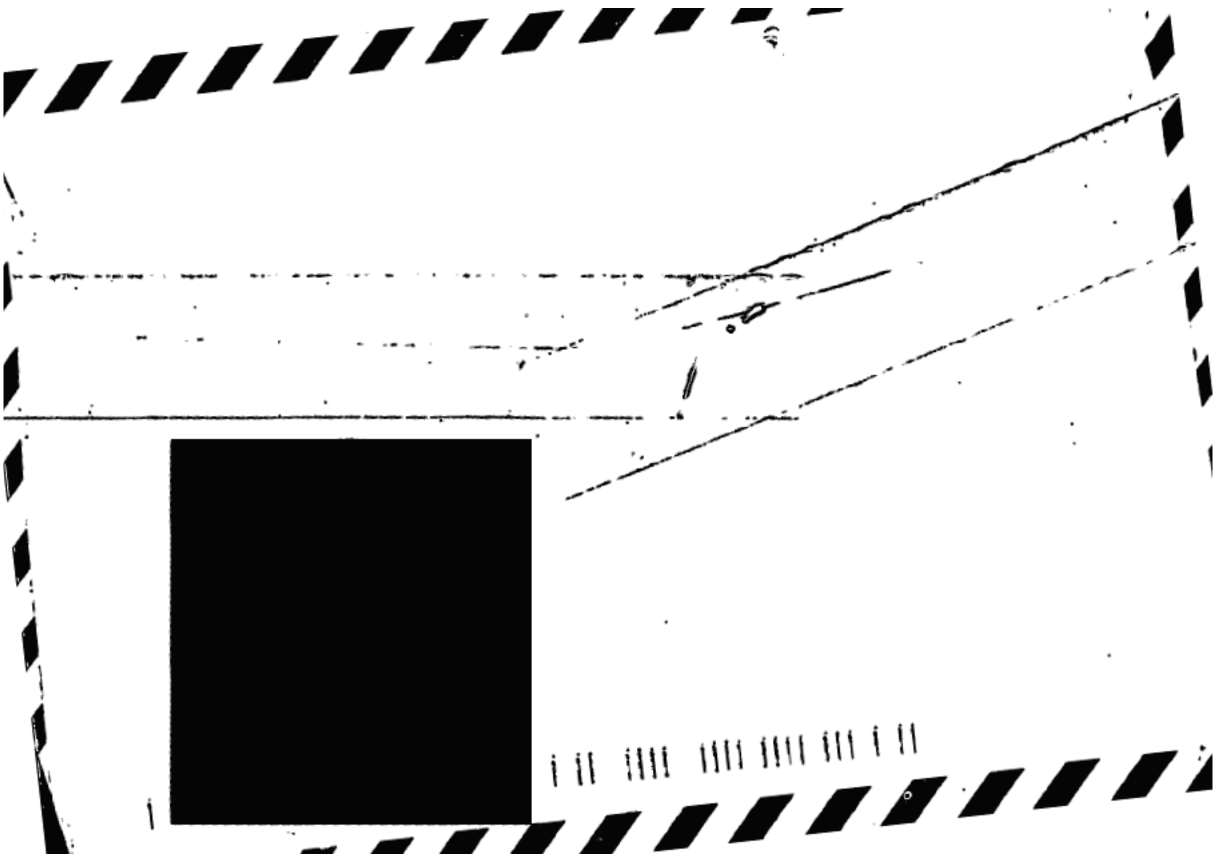


Exhibit 23

From: [redacted]
Sent: Thursday, July 2, 2026 10:13 PM
To: Mark C. Mao
Subject: I object to the Fee Application in Rodriguez v. Google, Case No. 3:20-CV-4688-RS
Attachments: Screenshot_20260703-001237.jpg; Screenshot_20260703-001240.jpg; Screenshot_20260703-001244.jpg; Screenshot_20260703-001248.jpg; Screenshot_20260703-001251.jpg; Screenshot_20260703-001254.jpg; Screenshot_20260703-001257.jpg; Screenshot_20260703-001300.jpg; Screenshot_20260703-001306.jpg; Screenshot_20260703-001309.jpg; Screenshot_20260703-001318.jpg; IMG_20260702_221626_325.jpg

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

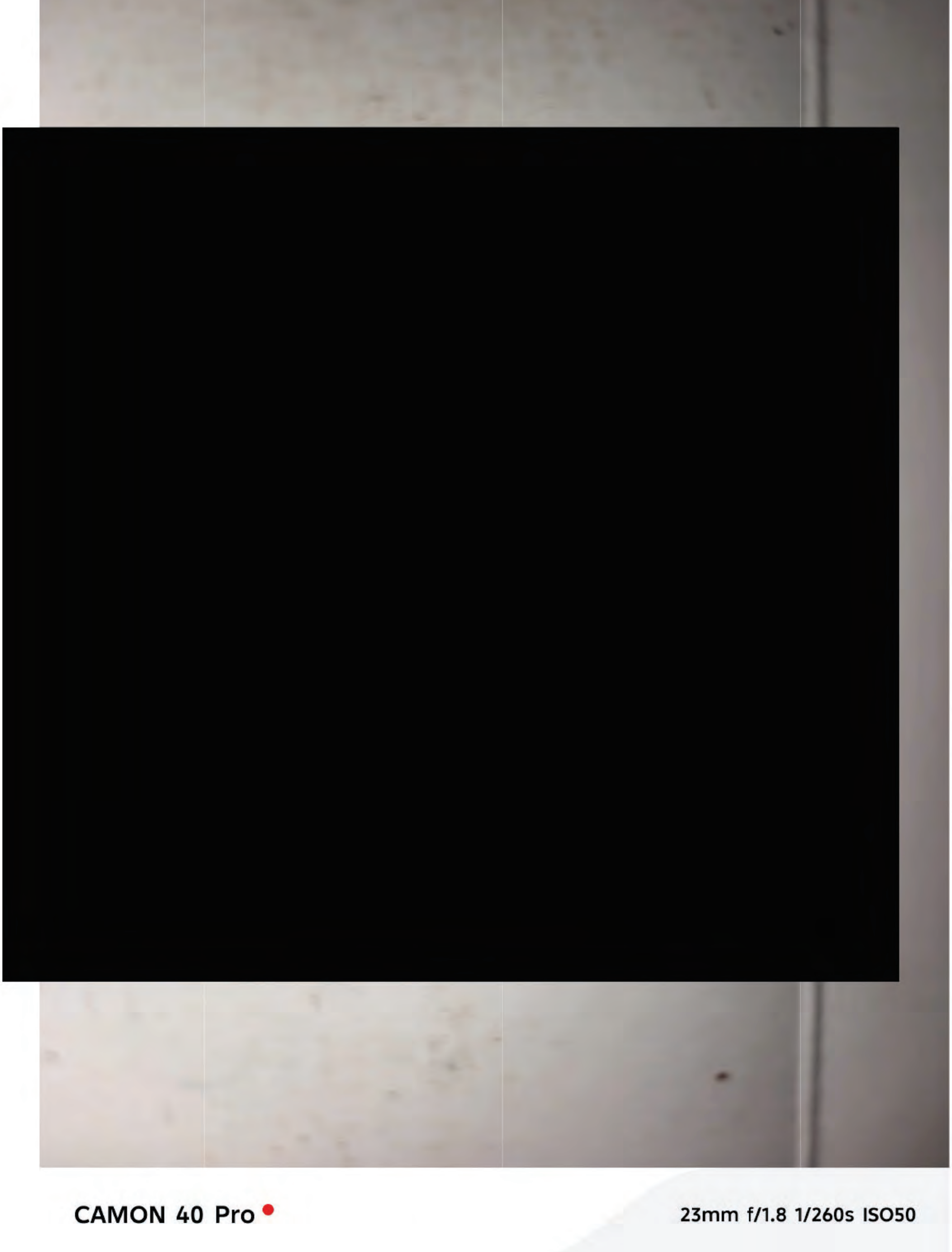
[redacted]

[redacted]

My phone numbers are [redacted]
Date of birth [redacted]
[redacted] is my email

Web & App Activity" control or the "Supplemental Web & App Activity" sub-setting turned off or "paused," you could be included in an ongoing class action lawsuit.

Mark C. Mao
Beko Reblitz-Richardson
BOIES SCHILLER FLEXNER LLP
You | 10:39 PM
James Lee
BOIES SCHILLER FLEXNER LLP
John A. Yanchunis
Ryan J. McGee
MORGAN & MORGAN
Bill Carmody
SUSMAN GODFREY LLP
You | 10:40 PM
Amanda Bonn
SUSMAN GODFREY LLP
The Court has appointed the following lawyers as my Class Counsel



[redacted]

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

Notice to Class Members who had Google "Web & App Activity" control or the "Supplemental Web & App Activity" sub-setting turned off or "paused" of Class Counsel's Fee Application

Para una notificacion en Español, visitar www.GoogleWebAppActivityLawsuit.com.

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

What is this notice about? On September 3, 2025, after a federal trial, the jury concluded that Google unlawfully collected information from certain users of smartphones and tablets who claimed they asked Google not to track their activity on mobile apps. The jury awarded a verdict of over $425 million in damages to two certified Classes. The Court entered a judgment, which requires Google to pay the Classes the amount of the jury's verdict plus interest. As of March 2, 2026, the verdict plus interest totals $440,345,685.40. Interest continues to accrue on that amount. However, Google has asked the Court to vacate the judgment, meaning disregard the jury verdict. Google may also appeal the judgment. There is no money available now, but Court rules require Class Counsel to make a formal request for their fees (their "Fee Application"), should compensation be awarded. This notice is to inform Class Members of the Fee Application and their opportunity to object to it.

What was the lawsuit about? Three Google inform Class Members of the Fee Application and their opportunity to object to it.

What was the lawsuit about? Three Google account holders ("Plaintiffs") filed a class action lawsuit alleging that Google LLC ("Google") unlawfully accessed their devices and data, including app activity data on their mobile devices, even though the Google activity controls called Web & App Activity ("WAA") and/or a sub-setting concerning "Chrome history and activity from sites, apps, and devices that use Google services," sometimes called supplemental Web & App Activity ("sWAA") were turned off or "paused." Plaintiffs alleged Google unlawfully accessed their mobile devices to collect, save, and use the data concerning their activity on non-Google apps that have incorporated certain Google software code into the apps. Plaintiffs have three legal claims: 1) invasion of privacy; 2) intrusion upon seclusion (similar to invasion of privacy); and 3) violation of the Comprehensive Computer Data Access and Fraud Act ("CDAFA"). The jury ruled that Google is liable for invasion of privacy and intrusion upon seclusion, but not for violation of the CDAFA.

You are receiving this Notice because Google's records indicate that you may be a Class Member. You were previously sent notice of the Court's certification of the Classes in this lawsuit in the fall of 2024. This Notice advises you of the jury verdict and judgment that were reached in the lawsuit, Class Counsel's Fee Application, your rights and options at this time, and the deadline to exercise them.

Who is a Class Member? The Court certified two classes to assert claims for invasion of privacy and intrusion upon seclusion. These classes include the following individuals:

99+

options at this time, and the deadline to exercise them.

Who is a Class Member? The Court certified two classes to assert claims for invasion of privacy and intrusion upon seclusion. These classes include the following individuals:

> Class 1 (the Android Class): All "non-Enterprise" and "non-Unicorn" 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 the Google Mobile Ads SDK.
>
> Class 2 (the Non-Android Class): All "non-Enterprise" and "non-Unicorn" 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 a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

"Enterprise individuals" refers to individuals who only have an "Enterprise" Google Account. An "Enterprise" Google Account is an account managed by an administrator that is designed for end users within an organization, such as businesses, non-profits, and schools. Individuals who have an "Enterprise" Google Account are not

99+

mobile device running a non-Android operating system, because of the Firebase SDK and/or Google Mobile Ads SDK.

"Enterprise individuals" refers to individuals who only have an "Enterprise" Google Account. An "Enterprise" Google Account is an account managed by an administrator that is designed for end users within an organization, such as businesses, non-profits, and schools. Individuals who have an "Enterprise" Google Account are not part of the certified Classes that claimed invasion of privacy and intrusion upon seclusion unless they also have another Google Account.

"Unicorn individuals" refers to individuals who only have a "Unicorn" Google Account, which is also known as a "supervised Google Account for users under age 13." A "supervised Google account for users under age 13" is an account created for a minor when they are under the age of 13, and which is created and supervised by a parent using Google Family Link. Individuals who have a "Unicorn" Google Account are not part of the certified Classes that claimed invasion of privacy and intrusion upon seclusion unless they also have another Google Account.

What was the verdict? The jury found Google liable to Class Members who use Android devices ("Class 1") and to Class Members who use non-Android devices ("Class 2") for invasion of privacy and intrusion upon seclusion. The jury awarded a total of $425,651,947, of which $247,154,157 is due to Class 1 (Android users) and $178,497,790 is due to Class 2 (non-Android users). These amounts will continue accruing interest as required by law. The jury found Google not liable for violation of the CDAFA. For more information about the verdict, you can visit the Case Website and read

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certified Classes that claimed invasion of privacy and intrusion upon seclusion unless they also have another Google Account.

What was the verdict? The jury found Google liable to Class Members who use Android devices ("Class 1") and to Class Members who use non-Android devices ("Class 2") for invasion of privacy and intrusion upon seclusion. The jury awarded a total of $425,651,947, of which $247,154,157 is due to Class 1 (Android users) and $178,497,790 is due to Class 2 (non-Android users). These amounts will continue accruing interest as required by law. The jury found Google not liable for violation of the CDAFA. For more information about the verdict, you can visit the Case Website and read the jury's verdict and related motions filed by both Google and the Plaintiffs.

Does the verdict mean money is available now? No money will be distributed at this time. While the jury did award a verdict, Google has asked the Court to vacate the judgment, meaning disregard the jury verdict. Google also may appeal. Class Counsel will continue to pursue the lawsuit against Google. If money or benefits become available at a later date, you will be notified and given instructions on how to make a claim.

What is a Fee Application? In a class action lawsuit like this, the Court decides the amount that Class Counsel will be paid for their work. When a jury awards compensation with a verdict in a class action, the Court requires that Class Counsel make a formal application for the fees Class Counsel believes it should be paid for their work in the lawsuit. Class Counsel must also request reimbursement for any costs and expenses incurred in bringing the lawsuit (such as the cost of expert witnesses and for providing notice to the Classes) and for service awards to the individual

99+

Google and the Plaintiffs.

Does the verdict mean money is available now? No money will be distributed at this time. While the jury did award a verdict, Google has asked the Court to vacate the judgment, meaning disregard the jury verdict. Google also may appeal. Class Counsel will continue to pursue the lawsuit against Google. If money or benefits become available at a later date, you will be notified and given instructions on how to make a claim.

What is a Fee Application? In a class action lawsuit like this, the Court decides the amount that Class Counsel will be paid for their work. When a jury awards compensation with a verdict in a class action, the Court requires that Class Counsel make a formal application for the fees Class Counsel believes it should be paid for their work in the lawsuit. Class Counsel must also request reimbursement for any costs and expenses incurred in bringing the lawsuit (such as the cost of expert witnesses and for providing notice to the Classes) and for service awards to the individual plaintiffs who represented class members and took part in the lawsuit. Individual Class Members are given an opportunity to review Class Counsel's fee application and object to any part of it. The Court considers Class Counsel's application and any objections, and the Court decides how much Class Counsel will be paid, how much they will be reimbursed, and what service awards will be granted to the class representatives.

What does the Fee Application Say? Class Counsel is requesting (1) attorneys' fees equal to 33% of the judgment, including both the jury's verdict award and interest, which continues to accrue until Google's challenges to the judgment are resolved; (2) $12,422,374.42 to reimburse costs and reimbursed, and what service awards will be granted to the class representatives.

What does the Fee Application Say? Class Counsel is requesting (1) attorneys' fees equal to 33% of the judgment, including both the jury's verdict award and interest, which continues to accrue until Google's challenges to the judgment are resolved; (2) $12,422,374.42 to reimburse costs and expenses incurred by Class Counsel; and (3) a total of $135,000.00 for service awards for the three class representatives. Class Counsel's Fee Application states their justification for each of these requests. The Court must approve the Fee Application and may award less than these amounts. You can review the Fee Application at the Case Website, www.GoogleWebAppActivityLawsuit.com by clicking here. These amounts will be paid from the compensation ultimately awarded in this case, if any. These amounts will not be paid until after the Court rules on Google's request to disregard the jury verdict and, if Google also chooses to appeal, after the Court rules on that appeal. You do not have to pay for Class Counsel or any of their fees and costs.

Who are Class Counsel? The Court has appointed the following lawyers as Class Counsel to represent Class Members.

Mark C. Mao
Beko Reblitz-Richardson
BOIES SCHILLER FLEXNER LLP
44 Montgomery St., 41st Floor
San Francisco, CA 94104

James Lee
BOIES SCHILLER FLEXNER LLP
100 SE 2nd St., 28th Floor
Miami, FL 33131

Mark C. Mao
Beko Reblitz-Richardson
BOIES SCHILLER FLEXNER LLP
44 Montgomery St., 41st Floor
San Francisco, CA 94104

James Lee
BOIES SCHILLER FLEXNER LLP
100 SE 2nd St., 28th Floor
Miami, FL 33131

John A. Yanchunis
Ryan J. McGee
MORGAN & MORGAN
201 N. Franklin Street,
7th Floor
Tampa, FL 33602

Bill Carmody
SUSMAN GODFREY LLP
One Manhattan West
50th Floor
New York, NY 10001

Amanda Bonn
SUSMAN GODFREY LLP
1900 Ave. of the Stars,
Suite 1400
Los Angeles, CA 90067

How do I object to the Fee Application? To object, you must file a written objection with the Court. Your objection must state that you object to the Fee Application in *Rodriguez v. Google*, Case No. 3:20-CV-4688-RS and must include the following information:

you for the objection (if any). This includes any former or current lawyers who may be paid for any reason regarding your objection; and

4. Your signature as the objector. A lawyer's signature is not adequate.

You must file your written objection with the Court so it is *received by* **July 30, 2026**. You must also send your objection to Class Counsel and the Notice Administrator, via US Mail or shipped by private courier (such as Federal Express) so it is *received by* **July 30, 2026**, to the following addresses:

Court
Clerk of the Court United States District Court Northern District of California Phillip Burton Federal Building 450 Golden Gate Avenue San Francisco, CA 94102
Class Counsel
Mark C. Mao Beko Reblitz-Richardson BOIES SCHILLER FLEXNER LLP 44 Montgomery St., 41st Floor San Francisco, CA 94104
Notice Administrator
Notice Administrator PO Box 2749 Portland, OR 97208-2749

Clerk of the Court
United States District Court
Northern District of California
Phillip Burton Federal Building
450 Golden Gate Avenue
San Francisco, CA 94102

Class Counsel

Mark C. Mao
Beko Reblitz-Richardson
BOIES SCHILLER FLEXNER LLP
44 Montgomery St., 41st Floor
San Francisco, CA 94104

Notice Administrator

Notice Administrator
PO Box 2749
Portland, OR 97208-2749

How do I get more information? Learn more about the lawsuit at www.GoogleWebAppActivityLawsuit.com or call 1-855-822-8821.

You may also obtain information regarding the lawsuit on the Court docket in this lawsuit, for a fee, 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, Phillip Burton Federal Building & United States Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

PLEASE DO NOT TELEPHONE THE COURT OR THE

Notice Administrator
PO Box 2749
Portland, OR 97208-2749

How do I get more information? Learn more about the lawsuit at www.GoogleWebAppActivityLawsuit.com or call 1-855-822-8821.

You may also obtain information regarding the lawsuit on the Court docket in this lawsuit, for a fee, 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, Phillip Burton Federal Building & United States Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS LAWSUIT. ALL QUESTIONS SHOULD BE DIRECTED TO THE NOTICE ADMINISTRATOR OR CLASS COUNSEL.

If [redacted] should not be subscribed or if you need to change your subscription information for Rodriguez v Google LLC, please use this preferences page.

AM656 v.02

Exhibit 24

[redacted]

[redacted] [redacted] [redacted]

July 8, 2026

John A. Yanchunis and Ryan J. McGee
Rodriguez v. Google, Case No. 3:20-CV-4688-RS
MORGAN & MORGAN
201 N. Franklin Street, 7th Floor
Tampa, FL 33602

To whom it may concern,

I have recently been made aware by email of a class action lawsuit against Google LLC for unlawfully collecting information from certain users of smartphones and tablets who claimed they asked Google not to track their activity on mobile apps. I hereby request to be excluded from any proceedings or settlement in *Rodriguez et al v. GoogleLLC et al*, Case No. 3:20-CV-4688-RS, of the United States District Court for the Northern District of California and retain my rights to bring lawsuits of my own against the defendants in the future should so be deemed necessary.

I missed the original opt-out cutoff date due to the unexpected and late notice of my possible addition to the class action lawsuit, but as discussed and approved with your office I am sharing my formal request today. I simply would like to assess what possible damages this breach may have caused me, if any, before taking action. The notice did not provide me with a Class Member Identification Code but I have listed other standard identifying information below:

Name: [redacted]
Email: [redacted]
Phone: [redacted]

Upon your receipt of this letter please reach out to me for confirmation.

With thanks,

[redacted]

Exhibit 25

July 14, 2026

[redacted]

Regarding case # Rodriquez VS. Google
Case No. 3:20-cv 4688 -RS

I opt out - to be Excluded from the fees application, I don't feel like this applies to me -

Thank you -
[redacted]

[redacted]

Freedom 250

RECEIVED
JUL 14 2026

[redacted]

Clerk of the Court
United States District Court
Northern Distict of California
Phillip Burton Federal Building
450 Golden Gate Avenue
[redacted] San Francisco Ca 94102

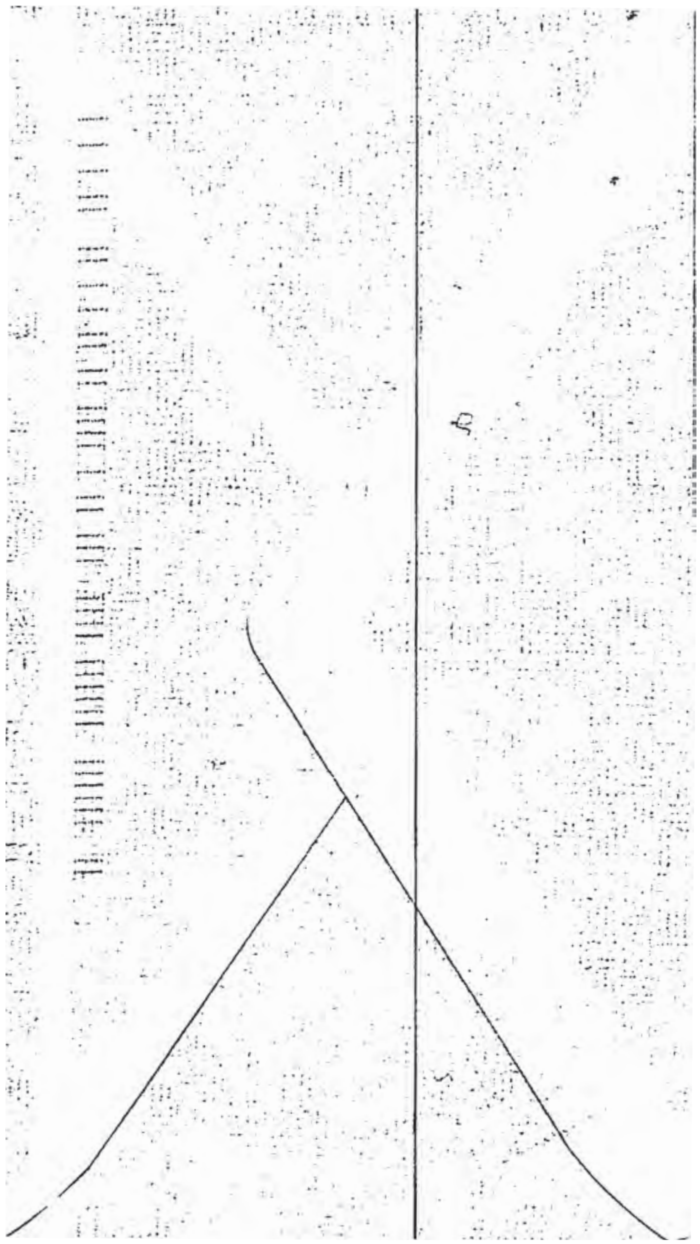

Exhibit 26

[redacted]

I object to the fee application in Rodriguez vs Google, Case No 3:20-CV-4688-RS.

[redacted]

I Don't Share my information

I object because I think the fee are way too high.

No lawyers are representing me.

[redacted]

7/23/2026

[redacted]

[redacted]

Mark C. Mao
Beko Reblitz-Richardson
Boies Schiller Flexner LLP
44 Montgomery St., 41st floor
San Francisco, CA
94104

[redacted]

Exhibit 27

From:

[redacted]

Rodriguez, v. Google, Case No. 3:20-CV-4688-
For Me: Emailed on: May 23, 2026, at: 8:18AM: "RS"
Subject: Court-Ordered Notice of Class Action
Rodriguez v Google L.L.C. Lawsuit!
Lawsuit Concerning: Google Web-App Activity Lawsuit!

United States District
Court For The Northern
District of California

Objector:

Reasons: I, [redacted] Object for: "The
Fee Application in Rodriguez v. Google,
Case No. 3:20-CV-4688-RS", 1. Due To:
Uncertainty in The Google Funding situation,
2. I, Unfortunately, Do Not have any funds
For Cover: The Fee Application, 3. After, I

3. Meet my Obligations, I Unfortunately, Do Not Have any Funds To Cover The Fee Application and, 4. Unfortunately, I feel, that, An Upfront Fee Application for fees is Unfair,,, When, There are No Lawsuit Funds and It is No Garantee, If, Funds or Benefits Will Ever Be PAID-Out, and No Funds are Available at this Time.

Thank you,

[redacted]

[redacted]

Rodriguez v. Google
Class Counsel and the Notice
P.O. Box 2749. Administrator

[redacted] Portland, OR 97208-2749.

Exhibit 28

July 15th, 2026

Settlement Administrator,

After receiving an email regarding a Notice of Proposal Class Action Settlement, I am sending you this "Opt-Out Letter" requesting to be excluded from the Settlement Class listed below:

Rodriguez v. Google, Case No. 3:20-CV-4688-RS;

Thank you,

[redacted]

[redacted]

To: Notice Administrator
PO Box 2749
Portland, OR 97208-2749

[redacted]

[redacted]

FOREVER USA

PO Box 2749
Portland, OR 97208-2749

[redacted]

Exhibit 29

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

Case No. 20-cv-4688-RS

OBJECTION OF CLASS MEMBER

Submitted by:

[redacted]

To the Honorable Court, Class Counsel, and the Notice Administrator:

I am a member of the certified class in Case No. 20-cv-4688-RS and respectfully submit this objection concerning the proceedings, any proposed judgment affecting class recovery, and any application for attorneys' fees and costs that may be considered by the Court.

The jury found Google liable for invasion of privacy and intrusion upon seclusion arising from Google's collection and use of data from non-Google mobile applications despite users having Web & App Activity ("WAA") and/or supplemental Web & App Activity ("sWAA") turned off or paused. These findings are significant because they concern the privacy rights of millions of individuals who reasonably believed they had disabled such collection through Google's own privacy controls.

My objection is based upon the following grounds:

1. The privacy violations found by the jury were substantial.

The conduct at issue allegedly occurred over many years and involved the collection, storage, and use of user activity data despite settings that reasonably communicated to users that such activity tracking had been disabled. The jury's liability findings demonstrate that these concerns were not merely technical violations but constituted actionable invasions of privacy.

2. Any recovery to class members should reflect the seriousness of the violations.

Personal data has value. Privacy has value. When a corporation is found liable for invading the privacy of individuals on a massive scale, the relief provided to affected class members should be meaningful and proportional to the nature and duration of the misconduct found by the jury.

3. The Court should carefully scrutinize any request for attorneys' fees.

I recognize and appreciate the work performed by Class Counsel. However, any fee award should remain proportional to the actual benefit received by class members.

The primary purpose of this litigation should be to compensate affected individuals and promote accountability rather than disproportionately rewarding attorneys at the expense of the class.

4. Additional safeguards should be considered.

Given the jury's findings, I respectfully request that the Court consider whether additional transparency requirements, monitoring mechanisms, privacy protections, or other injunctive measures are necessary to ensure that similar conduct does not occur in the future.

REQUEST FOR RELIEF

For these reasons, I respectfully request that the Court:

A. Carefully review and, if necessary, modify any proposed recovery structure to ensure meaningful relief for class members;

B. Closely examine any request for attorneys' fees and costs for reasonableness and proportionality;

C. Consider additional privacy protections and oversight measures; and

D. Grant any other relief the Court deems just and proper.

I submit this objection in good faith as a member of the affected class and appreciate the Court's consideration of these concerns.

Respectfully submitted,

[redacted]

Date: 7/3/2026

[redacted] [redacted]

MANATEE

Rodriguez V GOOGLE
P.O. Box 2749
Portland, OR 97208-2749

[redacted]

Exhibit 30

[redacted]

I object to the Lawyers fee's because it would be a Financial Hardship to pay this fee.

[redacted]

CASE NO. 833514640IBEP

[redacted] [redacted]

Notice Administrator
PO Box 2749
Portland, OR 97208-2749

[redacted]

Exhibit 31

[redacted]

To; class counsel Mark C. MAO

Today im writing this statement to say I do not have mony to pay for the written objection concerning the google Lawsuit settlement. I cant afford the court cost,

[redacted]

MARK C. Mao
Beko Reblitz Richardson
Boies Schiller Flexner LLP
44 montgomery st 41st Floor
San Francisco CA
94104

[redacted]

Exhibit 32

I, [redacted] who resides at [redacted]

wish to opt out of the Class action settlement regarding *Rodriguez v. Google*, Case No. 3:20-CV-4688-RS

My personal phone number is [redacted] and my personal email is [redacted], both of which can be used for communication regarding this case if anything else is required from me.

[redacted]

[redacted] [redacted]

Notice Administrator

PO Box 4749

Portland, OR 97208-4749

[redacted]