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

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

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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

**DECLARATION OF JULIAN SANTIAGO  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR FEES, COSTS, AND SERVICE  
AWARDS**

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

**DECLARATION OF JULIAN SANTIAGO**

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

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

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

3. I provided a declaration in support of Plaintiffs’ motion for class certification (Dkt. 315-8), and I am now providing this declaration in support of the judgment achieved in this case.

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

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

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

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

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

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

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

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

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

10 8. I understand that I am a member of Class 2 for all claims because I turned WAA  
11 and sWAA off but Google still collected my (s)WAA-off Data on non-Google-branded mobile  
12 apps from my non-Android mobile devices. Although I thought that Google would not collect,  
13 save, or use any (s)WAA-off Data when I had turned off WAA and sWAA, I now know that  
14 Google still collects, saves, and uses my (s)WAA-off Data without my consent.

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

19 10. I have responded to numerous written discovery requests from Google, including  
20 9 interrogatories, 41 requests for production, and 36 requests for admission which, cumulatively  
21 in this case, required many days of my attention and work to fulfill. This included working with  
22 my lawyers to identify potential sources, searching for and gathering potentially responsive  
23 documents, and reviewing and providing input on the responses to Google’s discovery requests.

24 11. My personal devices were also imaged so that account information, settings, and  
25 other data could be retrieved. I also allowed Google to pull information from my account that is  
26 sensitive and confidential to me, like my Google subscriber information. I also helped gather  
27 information from my device (with the help of my lawyers and experts) to submit to Google to help  
28

1 understand how Google’s collection, storage, and use of (s)WAA-off Data works.

2 12. I provided deposition testimony for this case on March 7, 2022. My deposition  
3 lasted that full day. In preparation for that deposition, I met many times with my lawyers in the  
4 weeks and days leading up to the deposition, which was time I ordinarily would have spent on  
5 other professional and personal matters.

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

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

19 15. In August 2025, I traveled from Miami, Florida to San Francisco, California to  
20 prepare for and attend trial. This was a difficult burden on my family and me. First, I was away  
21 from my family for weeks, and was not able to contribute to my usual duties in my personal life.  
22 Additionally, I was not able to work while I was in San Francisco because I was focused on my  
23 duties and obligations as a class representative, which included working with my lawyers to  
24 prepare for trial, which included myriad meetings before and during trial to ensure that the classes  
25 were represented as well as possible. While my employer understood the gravity of this case and  
26 my involvement in it, and accommodated my time in San Francisco, I still was not able to  
27 contribute to work and earn a living.

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