

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT**

United States District Court for the Northern District of California  
*A.B., et al. v. Google LLC, et al., Case 5:23-cv-03101*

**If you downloaded or used an app from Google Play from April 1, 2015 to the present while under the age of 13, you may be eligible for a payment from a Class Action Settlement.**

*A federal court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.*

- A proposed Settlement has been reached with Google LLC and AdMob Google Inc., the Defendants, in a class action lawsuit about the unlawful collection, use, and disclosure of personal information from children under 13 using Google Play applications (“apps”) from April 1, 2015 to the present (the Settlement Class Period), in violation of their privacy rights. The Defendants deny these allegations and deny all wrongdoing.
- You are included in this Settlement as a Settlement Class Member if you live in the United States and were younger than 13 years old when, at any time during the Settlement Class Period, you downloaded or used an app from Google Play and the Defendants allegedly collected, used, or disclosed any of your personal information.
- Under the proposed Settlement, the Defendants will pay \$8,250,000 to establish a Settlement Fund to cover *pro rata* (proportional) payments to Settlement Class Members with Valid Claims, as well as Notice and Settlement Administrative Costs, taxes, and the court-approved Attorney’s Fees, Costs, and Service Awards.
- As a Settlement Class Member, your rights are affected whether you do or do not act. Please read this Notice carefully.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>		<b>DEADLINE</b>
<b>File a Claim</b>	The only way to receive a Settlement Payments is to submit a valid and timely Claim Form.	<b>September 14, 2026</b>
<b>Opt Out of the Settlement</b>	If you opt out, you will not be bound by the terms of the Settlement and you keep the right to sue the Defendants about the claims resolved by this Settlement. You will not receive any benefits from the Settlement.	<b>August 4, 2026</b>
<b>Object to the Settlement and/or Attend a Hearing</b>	If you do not opt out of the Settlement, you may object to it and tell the Court what you do not like about it. You may also ask the Court for permission to speak about your Objection at the Final Approval Hearing. If you object, you can still file a claim.	<b>August 4, 2026</b>
<b>Do Nothing</b>	If you do nothing, you will remain a Settlement Class Member and will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendants related to the legal claims resolved by this Settlement. You will not receive any benefits from the Settlement.	No Deadline

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

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## **BASIC INFORMATION**

### **1. Why was this Notice issued?**

A Court authorized this Notice because you have a right to know about the proposed Settlement of this Action and about all your options before the Court decides whether to grant Final Approval of the Settlement. This Notice explains the Action, your legal rights, what benefits are available, and who can receive them.

The Action is called *A.B., et al., v. Google LLC, et al.*, Case 5:23-cv-03101 and is pending in the United States District Court for the Northern District of California before the Hon. P. Casey Pitts. The people who filed this Action are called the Plaintiffs and the companies they sued, Google LLC and AdMob Google Inc., are called the Defendants.

### **2. What is this Action about?**

A proposed Settlement has been reached with the Defendants, in a class action lawsuit that alleges that, from April 1, 2015 to the present, the Defendants collected, used, and disclosed personal information from children under 13 without parental consent through Google Play applications (“apps”), in violation of their privacy rights. The Action alleges that the Defendants used the collected information to target these under-13 users with behavioral advertising.

The Defendants deny these allegations and deny any and all wrongdoing.

### **3. What is a class action?**

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals who sue are known as “Class Representatives” or “Plaintiffs.” Together, the people included in the class action are called a “Class” or “Class Members.” One court resolves the lawsuit for all Class Members, except for those who exclude themselves (sometimes called, “opting out”) from a settlement.

In this case, the Class Representatives are: Plaintiffs A.B., a minor, by and through their court-appointed guardian Jen Turner; C.D.1, C.D.2, and C.D.3, minors, by and through their court-appointed guardian Kirenda Johnson; and E.F.1 and E.F.2, minors, by and through their court-appointed guardian Barbara Hayden-Seaman.

### **4. Why is there a Settlement?**

The Court has not decided in favor of the Plaintiffs or Defendants. The Defendants deny all claims and contend that they have not violated any laws. The Plaintiffs and Defendants agreed to a Settlement to avoid the costs and risks of a trial, and through the Settlement, Settlement Class Members are eligible to claim a payment and benefit more quickly. The Plaintiffs and their attorneys, who also represent the Settlement Class, believe the Settlement is in the best interests of all Settlement Class Members.

## **WHO IS IN THE SETTLEMENT?**

### **5. Who is included in the Settlement?**

The Settlement Class consists of anyone living in the United States who, at any time from April 1, 2015 through the present, was younger than 13 years old when they downloaded or otherwise used an application from Google Play and from whom the Defendants allegedly collected, used, or disclosed any personal information.

## 6. Are there exceptions to being included in the Settlement?

Yes, excluded from the Settlement Class are all Persons who are: (1) the Defendants, their subsidiaries and affiliates, officers, and directors; (2) the judges to whom this case is or has been assigned and any member of the judges' immediate family; (3) anyone who submits a valid and timely Request for Exclusion (*see* Question 15); and (4) Settlement Class Counsel.

### **THE SETTLEMENT CLASS MEMBER BENEFITS**

## 7. What does the Settlement provide?

If approved by the Court, the Defendants will pay \$8,250,000 into a Settlement Fund to resolve the Action.

After deducting court-approved Attorneys' Fees and Costs, the Service Awards, and Settlement Notice and Administration Costs, the balance of the Settlement Fund (the Net Settlement Fund) will be used to provide Settlement Payments to Settlement Class Members on a *pro rata* (proportional) basis.

Any money left in the Net Settlement Fund after all fees, costs, awards, and payments, if any, will be donated to court-approved charities (a *cy pres* distribution). No funds will be returned to Defendants.

At this time, it is unknown how much each Settlement Class Member who files a Valid Claim will receive. The amount will depend on the number of Valid Claims submitted.

## 8. What claims am I releasing if I stay in the Settlement Class?

Unless you opt out of the Settlement, you cannot sue, continue to sue, or be part of any other lawsuit against the Defendants about any of the legal claims alleged in the Complaint, or that could have been alleged in the Complaint. The Releases section in the Settlement Agreement describes the legal claims that you give up if you remain in the Settlement Class. The Settlement Agreement can be found at [www.COPPAPrivacyClassAction.com/documents](http://www.COPPAPrivacyClassAction.com/documents).

### **HOW TO GET SETTLEMENT CLASS MEMBER BENEFITS – MAKING A CLAIM**

## 9. How do I submit a Claim Form?

To file a claim, you must submit a Claim Form by **September 14, 2026**. Claim Forms may be submitted online at [www.COPPAPrivacyClassAction.com](http://www.COPPAPrivacyClassAction.com) by 11:59 p.m., or, downloaded from the Settlement Website, and mailed postmarked by **September 14, 2026** to the Settlement Administrator at:

*A.B., et al., v. Google LLC, et al.,*  
c/o Kroll Settlement Administration LLC  
P.O. Box 5391  
New York, NY 10150-5391

Each Settlement Class Member will have the opportunity to submit one claim. Settlement Claim Forms must be signed by the Settlement Class Member **or**, if the Settlement Class member is under 18 as of May 29, 2026, the name and signature of the parent or legal guardian acting on their behalf. Settlement Claim Forms must be submitted by Settlement Class Members or a parent or legal guardian. No Settlement Claim Forms from third parties will be accepted.

## 10. How do Settlement Class Members that are minors (under the age of 18) file a claim?

If a Settlement Class Member is a minor, their Claim Form must be submitted and signed by their parent or legal guardian. A minor is defined as a Person who is under the age of 18 as of May 29, 2026.

## 11. When will I get my Settlement Payment?

After the Settlement is “finally approved” and any challenges to that approval are finally resolved. The Court is scheduled to hold a Final Approval Hearing on **September 24, 2026, at 10:00 a.m.**, to decide whether to approve the Settlement, how much Attorneys’ Fees and Costs to award Settlement Class Counsel for representing the Settlement Class, and the amount of the Service Awards to the court-appointed guardians of the Class Representatives who brought this Action on behalf of the Settlement Class.

If the Court approves the Settlement, there may be appeals. It is always uncertain whether appeals will be filed and, if so, how long it will take to resolve them. Settlement Payments will be distributed as soon as possible--if the Court grants Final Approval of the Settlement and after any appeals are resolved.

## THE LAWYERS REPRESENTING YOU

### 12. Do I have a lawyer in this case?

Yes, the Court appointed lawyers at the firms Silver Golub & Teitell LLP and Lexington Law Group to represent you and other members of the Settlement Class as Settlement Class Counsel. You will not be charged directly for these lawyers; instead, they will receive compensation from the Settlement Fund (subject to Court approval). Settlement Class Counsel is available to answer any questions and may be contacted as follows:

Ian W. Sloss Silver Golub & Teitell LLP One Landmark Square, Floor 15 Stamford, CT 06901	Patrick Carey Lexington Law Group 503 Divisadero Street San Francisco, CA 94105
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If you want to be represented by your own lawyer, you may hire one at your own expense.

### 13. Should I get my own lawyer?

It is not necessary for you to hire your own lawyer because Settlement Class Counsel works for you. If you want to be represented by your own lawyer, you may hire one at your own expense.

### 14. How will the lawyers be paid?

Settlement Class Counsel will ask the Court to approve attorneys’ fees up to 30% of the \$8,250,000 Settlement Fund (\$2,475,000) plus reimbursement of costs and expenses, as well as Service Awards of up to \$500 for each of the three court-appointed guardians of the Settlement Class Representatives. If approved, these amounts will be paid from the Settlement Fund before making payments to Settlement Class Members who submit Valid Claims.

## EXCLUDING YOURSELF FROM THE SETTLEMENT

### 15. How do I opt out of the Settlement?

If you do not want to receive any benefits from the Settlement and you want to keep your right to separately sue the Defendants about the legal issues in this case, you must take steps to exclude yourself from the Settlement Class. This is called “opting out.” The Opt-Out Deadline to submit a “Request for Exclusion” from the Settlement is **August 4, 2026**.

To exclude yourself from the Settlement, you must submit a written Request for Exclusion to the Settlement Administrator that includes the following information:

- Your name, address, telephone number, and email address;
- A statement indicating that you want to be excluded from the Settlement Class, such as “I hereby request to be excluded from the proposed Settlement Class in *A.B., et al., v. Google LLC, et al., Case 5:23-cv-03101*”;
- Your signature or e-signature (or that of your legal guardian or representative if you are under 18 by May 2026) under penalty of perjury.

Your Request for Exclusion must be submitted online through the Settlement Website by 11:59 p.m., or mailed to the Settlement Administrator postmarked by **August 4, 2026** at:

*A.B., et al., v. Google LLC, et al.,*  
c/o Kroll Settlement Administration LLC  
ATTN: Exclusions  
P.O. Box 5391  
New York, NY 10150-5391

### **OBJECTING TO THE SETTLEMENT**

#### **16. How do I tell the Court if I do not like the Settlement?**

If you are a Settlement Class Member, you can choose (but are not required) to object to the Settlement if you do not like it or a portion of it, whether that be to the Settlement Class Member Benefits, the request for Attorneys’ Fees and Costs, the Service Award payments, the Releases provided to the Defendant, the fairness, reasonableness or adequacy of the Settlement, or some other aspect of the Settlement. Through an Objection, you give reasons why you think the Court should not approve the Settlement. The Court can only approve or reject the settlement. If the Court denies approval, no settlement payments will be sent out, and the lawsuit will continue. If that is what you want to happen, you should object.

A parent or legal guardian must submit an Objection for any Settlement Class Member who is a minor, or Person who is under the age of 18 as of **May 29, 2026**.

For an Objection to be considered by the Court, the Objection must include:

- The case name and number, “*A.B., et al., v. Google LLC, et al., Case 5:23-cv-03101*.”
- The Settlement Class Member’s full name, address, telephone number, and email address.
- The full name, address, telephone number, and email address of the Objector’s counsel (if any).
- A statement about whether the Objection only applies to the Objector or to others.
- The specific factual and legal grounds for each Objection.
- A statement about whether the Objector intends to appear in person or through counsel at the Final Approval Hearing.
- A statement, declaration, or sworn affidavit submitted by the Objector stating, “Under penalty of perjury, I (or the Settlement Class Member, if a minor) is a member of the Settlement Class.”
- Your signature (and the signature of a parent or legal guardian if the Objector is a minor).

Objections must be filed with the Court by 11:59 p.m. on **August 4, 2026** if filing online or mailed postmarked no later than **August 4, 2026** to:

Office of the Clerk  
United States District Court  
Northern District of California  
280 South 1<sup>st</sup> Street, Room 2112  
San Jose, CA 95113

### **17. What is the difference between objecting and opting out?**

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

## **THE COURT'S FINAL APPROVAL HEARING**

### **18. When is the Court's Final Approval Hearing?**

The Court is scheduled to hold a Final Approval Hearing on **September 24, 2026 at 10:00 a.m.**, at United States District Court for the Northern District of California, Robert F. Peckham Federal Building & United States Courthouse, 280 South 1<sup>st</sup> Street, San Jose, CA 95113, to decide whether to approve the Settlement, how much Attorney's Fees and Costs to award to Class Counsel for representing the Settlement Class, and whether to approve the Service Awards to the Class Representatives who brought this Action on behalf of the Settlement Class. The date and time of this hearing may change without further notice. Please check [www.COPPAPrivacyClassAction.com](http://www.COPPAPrivacyClassAction.com) for updates.

### **19. Do I have to come to the Final Approval Hearing?**

No. Settlement Class Counsel will answer any questions the Court may have. You may attend at your own expense. If you file an Objection, you may but do not have to come to the Final Approval Hearing to talk about it. If you file your written Objection on time and in accordance with the requirements above, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

## **IF YOU DO NOTHING**

### **20. What happens if I do nothing at all?**

If you are a Settlement Class Member and you do nothing, you will give up your right to start a lawsuit, continue a lawsuit, or be part of any other lawsuit against the Defendants and the Released Parties, as defined in the Settlement Agreement, about the legal issues resolved by this Settlement. In addition, you will be bound by the Releases in the Settlement and will not be eligible to receive a Settlement Payment.

## **GETTING MORE INFORMATION**

### **21. How do I get more information?**

This Notice summarizes the proposed Settlement. Complete details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at the Settlement Website, [www.COPPAPrivacyClassAction.com/documents](http://www.COPPAPrivacyClassAction.com/documents).

If you would like to access the case docket to learn more about the case, you can do so online through <https://pacer.uscourts.gov/> and searching for the case number 5:23-cv-03101 in the Northern District of California. You may have to sign up for an account and pay a fee if you do not already have an account. You can also access the case docket in person by visiting the Office of the Clerk, United States District Court for the Northern District of California, Robert F. Peckham Federal Building & United States Courthouse, 280 South 1<sup>st</sup> Street, Room 2112, San Jose, CA 95113, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

If you have additional questions or need to update your address, you may contact the Settlement Administrator by phone at (833) 447-6416, or by mail:

*A.B., et al., v. Google LLC, et al.,*  
c/o Kroll Settlement Administration LLC  
P.O. Box 5391  
New York, NY 10150-5391

**PLEASE DO NOT CONTACT THE COURT OR DEFENDANTS.**