

GUTRIDE SAFIER LLP  
Seth A. Safier (State Bar No. 197427)  
seth@gutridesafier.com  
Marie A. McCrary (State Bar No. 262670)  
marie@gutridesafier.com  
Todd Kennedy (State Bar No. 250267)  
todd@gutridesafier.com  
100 Pine Street, Suite 1250  
San Francisco, CA 94111  
Telephone: (415) 639-9090  
Facsimile: (415) 449-6469

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

LENNIE WOODLEY and JOSEPH S.  
SCHRANT, as individuals, on behalf of  
themselves, the general public, and those  
similarly situated,

Plaintiffs,

v.

GOOGLE LLC; and UNITED PARCEL  
SERVICE OF AMERICA, INC.

Defendants.

CASE NO.

CLASS ACTION COMPLAINT FOR  
INVASION OF PRIVACY; INTRUSION  
UPON SECLUSION; WIRETAPPING IN  
VIOLATION OF THE CALIFORNIA  
INVASION OF PRIVACY ACT  
(CALIFORNIA PENAL CODE § 631);  
COMMON LAW FRAUD, DECEIT  
AND/OR MISREPRESENTATION; AND  
UNJUST ENRICHMENT

JURY TRIAL DEMANDED

**TABLE OF CONTENTS**

|    |                                                                               |    |
|----|-------------------------------------------------------------------------------|----|
| 1  | INTRODUCTION .....                                                            | 3  |
| 2  | THE PARTIES.....                                                              | 5  |
| 3  | JURISDICTION AND VENUE .....                                                  | 6  |
| 4  | SUBSTANTIVE ALLEGATIONS .....                                                 | 7  |
| 5  | A.    The Design and Implementation of the Package Tracking System .....      | 7  |
| 6  | B.    Defendants Falsely Informed Consumers That Only Their Tracking          |    |
| 7  | Number Would be Sent to the Carrier. ....                                     | 9  |
| 8  | C.    Defendants' Package Tracking System Causes Consumer Data to be Sent     |    |
| 9  | Without Authorization to the Carriers and Third Parties.....                  | 11 |
| 10 | D.    The Data Third Parties Receive as a Result of Defendants' Package       |    |
| 11 | Tracking System is Used to Track Consumers for Commercial Purposes.           |    |
| 12 | .....                                                                         | 16 |
| 13 | 1.    Facebook.....                                                           | 16 |
| 14 | 2.    Google (DoubleClick and Google Analytics).....                          | 26 |
| 15 | 3.    Adobe.....                                                              | 35 |
| 16 | 4.    Tealium .....                                                           | 45 |
| 17 | 5.    Quantum Metric .....                                                    | 62 |
| 18 | E.    The Private Communications Collected are Valuable. ....                 | 65 |
| 19 | F.    PLAINTIFFS' EXPERIENCES .....                                           | 67 |
| 20 | 1.    Plaintiff Lennie Woodley.....                                           | 67 |
| 21 | 2.    Plaintiff Joseph S. Schrant .....                                       | 69 |
| 22 | CLASS ALLEGATIONS .....                                                       | 71 |
| 23 | CAUSES OF ACTION.....                                                         | 74 |
| 24 | First Cause of Action: Invasion of Privacy.....                               | 74 |
| 25 | Second Cause of Action: Intrusion Upon Seclusion.....                         | 77 |
| 26 | Third Cause of Action: Wiretapping in Violation of the California Invasion of |    |
| 27 | Privacy Act (California Penal Code § 631) .....                               | 79 |
| 28 | Fourth Cause of Action: Common Law Fraud, Deceit and/or Misrepresentation .   | 83 |
|    | Fifth Cause of Action: Unjust Enrichment .....                                | 86 |
|    | PRAYER FOR RELIEF .....                                                       | 88 |

1 Plaintiffs Lennie Woodley and Joseph S. Schrant (collectively, “Plaintiffs”) bring this  
2 action on behalf of themselves, the general public, and all others similarly situated against  
3 Google LLC (“Google”) and United Parcel Service of America, Inc. (“UPS”) (collectively,  
4 “Defendants”). Plaintiffs’ allegations against Defendants are based on information and belief  
5 and the investigation of Plaintiffs’ counsel, except for allegations specifically pertaining to  
6 Plaintiffs, which are based on their personal knowledge.  
7

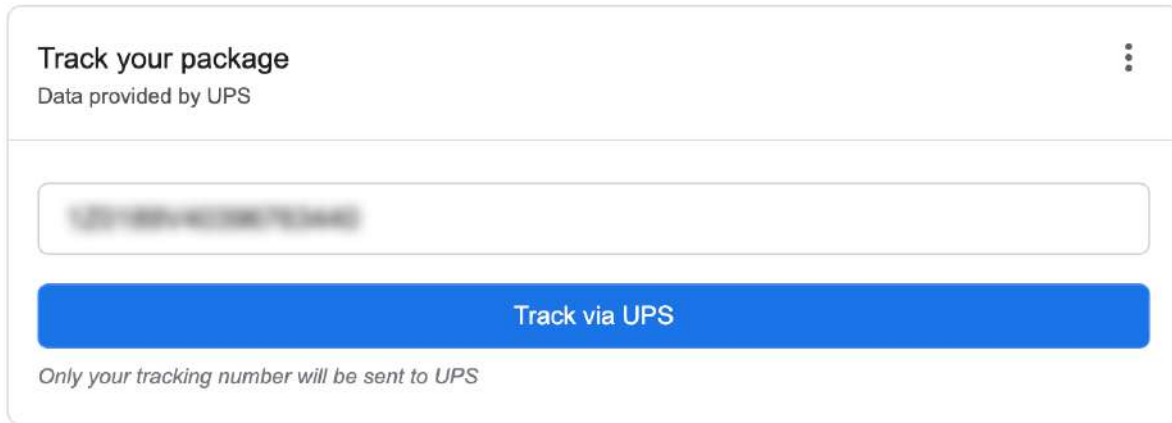
### 8 **INTRODUCTION**

9 1. This Class Action Complaint concerns Defendants’ violations of consumer  
10 privacy and a breach of consumer trust in violation of California law. Specifically, Defendants  
11 collaborated to develop a Package Tracking System that expressly promises consumers that  
12 their private information will not be shared, when in fact Defendants cause extensive private  
13 information about consumers using the Package Tracking System to be shared with a large  
14 number of third parties.

15 2. The Package Tracking System enables consumers to enter package tracking  
16 numbers into Google’s “Track your package” Widget on Google Search (the “Widget”) in  
17 order to receive tracking information. The Package Tracking System is integrated with various  
18 popular package carriers, including UPS, the FedEx Corporation (“FedEx”), and the United  
19 States Postal Service (“USPS”) (collectively, “the carriers”). As used herein, the term  
20 “Package Tracking System” refers collectively to the Widget, UPS’s integrated package  
21 tracking APIs and website, and the associated software.

22 3. When consumers search for their package tracking numbers on Google Search  
23 (www.google.com), the Package Tracking System designed by Google and the carriers,  
24 including UPS, displays to them a “Track your package” Widget near the top of the search  
25 results. The Widget allows consumers to click a button (the “Track Button”) to load the  
26 carrier’s webpage to see the package’s delivery status. To entice consumers to use the Widget,  
27 the Widget expressly represents that “Only your tracking number will be sent” to the selected  
28

1 carrier. For example, for UPS, the representation is that “Only your tracking number will be  
2 sent to UPS”:



11 4. That representation is false. When consumers click the Widget’s Track Button,  
12 massive amounts of data are sent not only to the relevant carrier—e.g., UPS—but also to  
13 multiple undisclosed third parties—including Meta Platforms, Inc. (Facebook), Google’s  
14 DoubleClick advertising platform and Google Analytics platform, Adobe Inc., Microsoft  
15 Corporation (Microsoft Bing), Quantum Metric, Inc., The Trade Desk, Inc., Yahoo, Inc., and  
16 many others (collectively, the “Third Parties”).<sup>1</sup> Defendants do not disclose any of this to  
17 consumers. To the contrary, Defendants affirmatively promise that there will be no such data  
18 sharing.

19 5. Indeed, clicking the Track Button associated with a UPS package directly  
20 caused the user’s browser to send **415 separate network requests** to UPS and many third-party  
21 domains. Similarly, clicking the Track Button associated with a FedEx package directly caused  
22 the user’s browser to send **142 separate network requests** to at least nineteen different  
23 domains. Each of these unauthorized requests contained a variety of information about the  
24 consumer and the consumer’s package *other than the package tracking number*.

25 6. The data transmitted to the Third Parties enabled them to learn details—and to  
26 supplement their existing user profiles—regarding users’ behaviors and communications,

27 <sup>1</sup> Although Google is a Defendant, the term “Third Parties” shall include Google to the extent  
28 consumer data is transferred to Google’s DoubleClick and Analytics platforms.

1 including their browsing history, visit history, website interactions, user input data,  
2 demographic and geolocation information (including whether a user is located in California),  
3 interests and preferences, purchasing behaviors, device information, referring URLs, session  
4 information, and user identifiers.

5 7. The Third Parties analyze and aggregate this user data across websites and time  
6 for their own purposes and financial gain, including creating consumer profiles containing  
7 detailed information about a consumer's behavior, preferences, and demographics; creating  
8 audience segments based on shared traits (such as Millennials, Californians, tech enthusiasts,  
9 etc.); and performing targeted advertising and marketing analytics. Further, the Third Parties  
10 share user data and/or user profiles with unknown parties to further their financial gain.

11 8. Consumers did not know of, much less consent to, this type of tracking and data  
12 sharing when they clicked or pressed the Track Button associated with the Widget. Based on  
13 Defendants' false representation, consumers reasonably believed that using the Widget would  
14 not cause any of their data to be shared with any party, except for the tracking information to  
15 be shared only with the selected carrier.

#### 16 **THE PARTIES**

17 9. Plaintiff Lennie Woodley is, and was at all relevant times, an individual and  
18 resident of Huntington Park, California. Plaintiff intends to remain in California and makes his  
19 permanent home there.

20 10. Plaintiff Joseph S. Schrant is, and was at all relevant times, an individual and  
21 resident of Isleton, California. Plaintiff intends to remain in California and makes his  
22 permanent home there.

23 11. Defendant Google LLC is a Delaware limited liability company with its  
24 principal place of business in Mountain View, California.

25 12. Defendant United Parcel Service of America, Inc. is a Delaware corporation  
26 with its principal place of business in Atlanta, Georgia.

1           13. At all times herein mentioned, each of the Defendants was the agent, servant,  
2 representative, officer, director, partner or employee of the other Defendants and, in doing the  
3 things herein alleged, was acting within the scope and course of his/her/its authority as such  
4 agent, servant, representative, officer, director, partner or employee, and with the permission  
5 and consent of each Defendant.

6           14. At all times herein mentioned, each of the Defendants was a member of, and  
7 engaged in, a joint venture, partnership and common enterprise, and acted within the course  
8 and scope of, and in pursuance of, said joint venture, partnership and common enterprise.

9           15. At all times herein mentioned, the acts and omissions of each of the Defendants  
10 concurred and contributed to the various acts and omissions of each and all of the other  
11 Defendants in proximately causing the injuries and damages as herein alleged.

12           16. At all times herein mentioned, each of the Defendants ratified each and every  
13 act or omission complained of herein.

14           17. At all times herein mentioned, each of the Defendants aided and abetted the acts  
15 and omissions of each and all of the other Defendants in proximately causing the damages, and  
16 other injuries, as herein alleged.

17                                   **JURISDICTION AND VENUE**

18           18. This Court has jurisdiction over the subject matter of this action pursuant to 28  
19 U.S.C. § 1332(d)(2). The aggregate amount in controversy exceeds \$5,000,000, exclusive of  
20 interest and costs; and Plaintiffs and at least one Defendant are citizens of different states.

21           19. The injuries, damages and/or harm upon which this action is based occurred or  
22 arose out of activities engaged in by each Defendant within, affecting, and emanating from, the  
23 State of California. Each Defendant regularly conducts and/or solicits business in, engages in  
24 other persistent courses of conduct in, and/or derives substantial revenue from products and  
25 services provided to persons in the State of California. Each Defendant has engaged, and  
26 continues to engage, in substantial and continuous business practices in the State of California.

27           20. Further, the Private Communications and data that each Defendant causes to be  
28

transmitted to Third Parties are routed through servers located in California.

21. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claims occurred in the state of California, including within this District.

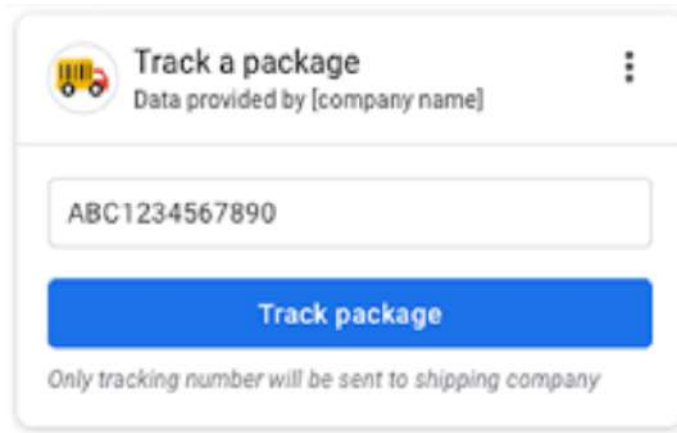
22. Venue is also proper in this District because at least one of the Defendants maintains a headquarters in this District.

23. Plaintiffs accordingly allege that jurisdiction and venue are proper in this Court.

### **SUBSTANTIVE ALLEGATIONS<sup>2</sup>**

#### **A. The Design and Implementation of the Package Tracking System**

24. In late 2019, Google announced its “Package Tracking Early Access Program,” stating “we have created a new package tracking feature that enables shipping companies to show people the status of their packages right on [Google] Search.”<sup>3</sup> The announcement included images showing how the tracking feature would appear to users on Google Search, including the following example:<sup>4</sup>



<sup>2</sup> The allegations in this section may alternate between the past and present tense, for readability. However, Defendants’ behavior has been identical throughout the class period, and Plaintiffs and those similarly situated seek relief for the entirety of that period.

<sup>3</sup> <https://perma.cc/BFG2-VCYT> (capture of <https://developers.google.com/search/blog/2019/12/package-tracking-early-access-program> as it appeared on 10/4/2026).

<sup>4</sup> *Id.*

25. As the image above confirms, Google contemplated from the outset that the Widget would include a representation to consumers that “Only tracking number will be sent to shipping company.”

26. Google stated in its announcement that “[t]o take part in the program, a carrier will need to provide a RESTful JSON or XML API that returns the package tracking information.”<sup>5</sup> In other words, the carrier, including UPS, needed to provide an Application Programming Interface to Google that would (i) enable Google to send a network request to it that included the tracking number; (ii) process the tracking number to obtain detailed shipping information in the possession of the carrier; and (iii) respond to Google’s network request with the detailed shipping information, so that Google could then display that information to the consumer. Google further stated in its announcement: “We can work with you to reuse an existing API or setup a new one.”<sup>6</sup>

27. In a separate document, Google set forth the requirements for participation in its Package Tracking Early Access Program.<sup>7</sup> To meet the requirements, the participant needed to (i) be a package delivery company; (ii) receive POST network requests from Google that included the package tracking number; and (iii) quickly respond to those requests with the current status of the package.<sup>8</sup> Google did not state that participants were prohibited from causing consumers’ information to be sent to third parties.<sup>9</sup>

28. Google further stated in its requirements document that it did not accept “[a]ny personal data about the recipient or sender of the package” or “[a]ny geographical information about the recipient or sender of the package.”<sup>10</sup> Google nevertheless received, at a minimum,

---

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> *See*

<https://web.archive.org/web/20221002093755/https://developers.google.com/search/docs/appearance/package-tracking> (archive.org 10/02/2022 capture of <https://developers.google.com/search/docs/appearance/package-tracking>).

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

1 personal data and geographical information about consumers through its Analytics and  
2 DoubleClick platforms, as described below.

3 29. At no time was any carrier allowed to participate in Google's Package Tracking  
4 Early Access Program until Google reviewed and approved the carrier's implementation of the  
5 program. Google refers to the carriers as its "partners" with respect to the Package Tracking  
6 Early Access Program; its current documentation states that "[t]he package tracking early  
7 adopters program is no longer accepting new partners."<sup>11</sup>

8 30. Each of the carriers entered into Google's Package Tracking Early Access  
9 Program. Each carrier, including UPS, designed, developed, and implemented an Application  
10 Programming Interface (API) that was compatible with Google's system, to enable users to  
11 track their packages through the Widget on Google Search. Google reviewed and approved  
12 each carrier's integration, and configured Google Search to enable consumers to track their  
13 packages for each carrier.

14 **B. Defendants Falsely Informed Consumers That Only Their Tracking**  
15 **Number Would be Sent to the Carrier.**

16 31. When Plaintiffs and Class members searched for a package tracking number on  
17 Google Search, Defendants' Package Tracking System displayed to them a "Track your  
18 package" Widget near the top of the search results. To entice consumers to click the Track  
19 Button, the Widget represents that "[o]nly your tracking number will be sent to  
20 [UPS/FedEx/USPS]" as shown in the screenshots below:

21  
22  
23  
24  
25  
26  
27 <sup>11</sup> <https://perma.cc/U4NH-9ADR> (capture of  
28 <https://developers.google.com/search/docs/appearance/package-tracking> as it appeared on  
10/4/2026).

Track your package

Data provided by UPS

Track via UPS

Only your tracking number will be sent to UPS

Track your package

Data provided by FedEx

Track via FedEx

Only your tracking number will be sent to FedEx

Track your package

Data provided by USPS

Track package

Only your tracking number will be sent to USPS

(tracking numbers blurred.)

32. In reliance on Defendants’ representation and promise that “[o]nly your tracking number will be sent” to the relevant carrier, Plaintiffs and Class members clicked or pressed the Track Button, thereby indicating their choice and/or agreement to send only the tracking number to only the particular package carrier identified by the Widget.

33. At no time did Defendants disclose to consumers that using the Widget would immediately cause extensive information besides the tracking number to knowingly be sent to the carrier, and also to a large number of third-party companies by Google and UPS.

**C. Defendants' Package Tracking System Causes Consumer Data to be Sent Without Authorization to the Carriers and Third Parties.**

34. The simple act of entering a package tracking number into the Widget and clicking the Track Button causes a consumer's browser to send extensive data besides the tracking number to the selected carrier and the Third Parties.

35. When using the Widget to track a UPS package, clicking the Track Button caused the user's browser, including each of the Plaintiffs' browsers, to send **415** separate network requests to at least **twenty-eight** different domains, including at least ups.com, adsrvr.org, akamaihd.net, appdomain.cloud, bing.com, blueconic.net, company-target.com, cookielaw.org, demandbase.com, doubleclick.net, facebook.com, facebook.net, gstatic.com, go-mpulse.net, google.com, googleadservices.com, googleapis.com, googletagmanager.com, iesnare.com, omtrdc.net, onetrust.com, qualtrics.com, quantummetric.com, tealiumiq.com, techlab-cdn.com, tiqcdn.com, yahoo.com, and yimg.com. Below are just a few examples of the data that were sent to some of these domains immediately upon clicking the Track Button:

| Recipients | Data Names                                                                                                                                                      | Data Type | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| UPS        | _gcl_au<br>fbp<br>Uetsid<br>Uetvid<br>_ga<br>_ga_13B5QB73DW<br>s_fid<br>s_vi<br>AMCVS_...<br>AMCV_...<br>s_vnc365<br>s_ivc<br>s_inv<br>s_cc<br>s_tslv<br>s_nr30 | cookies   | Google Ads conversion tracking; Facebook ads ID; Bing Ads session ID; Bing Ads visitor ID; Google Analytics visitor ID; Google Analytics session ID; Adobe fallback visitor ID; Adobe visitor ID; Adobe session flag; Adobe visitor ID; Adobe visit counter; Adobe visitor count flag; Adobe visit number; Adobe cookie-enabled check; Adobe last-visit timestamp; Adobe return-visitor indicator; Behavior analytics user ID; Behavior analytics session ID; |

|                       |                                                                                                                                                                                                                                                                                                                   |                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                       | QuantumMetricUserID<br>QuantumMetricSessionID<br>utag_main<br>mbox<br>mboxEdgeCluster<br>PIM-SESSION-ID<br>BCSessionID<br>bc_id<br>loc_session<br>jedi_loc<br>at_check<br>IBM_WAC_ANONYMOUS_USE<br>R_ID<br>ak bmsc                                                                                                |                                                         | Tealium session/visitor data;<br>Adobe Target testing ID;<br>Adobe Target routing; UPS<br>session ID; Backend session<br>ID; Backend user/device ID;<br>Location/session info;<br>Location-permission state;<br>Adobe cookie check; IBM<br>analytics anonymous ID;<br>Akamai bot-mitigation score                                                                                                                                                                                                                                      |
| Quantum<br>Metric     | (n/a)                                                                                                                                                                                                                                                                                                             | HTTP<br>POST body                                       | recording of the user's<br>screen/mouse movements and<br>keyboard inputs                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Quantum<br>Metric     | u                                                                                                                                                                                                                                                                                                                 | URL query<br>parameter<br>in an HTTP<br>POST<br>request | UPS package tracking number                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Adobe<br>(omtrdc.net) | url<br>marketingCloudVisitor<br>Id                                                                                                                                                                                                                                                                                | HTTP<br>POST body                                       | UPS package tracking number;<br>unique user/device ID used by<br>Adobe for cross-domain<br>tracking.                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Tealium               | meta.APPVARS.TRK_trac<br>knum<br>ut.visitor_id<br>ut.session_id<br>cp._gcl_au<br>cp._fbp<br>cp._ga<br>cp.IBM_WAC_ANONYMOUS_<br>USER_ID<br>cp.QuantumMetricUserI<br>D<br>cp.PIM-SESSION-ID<br>cp.AMCV_*<br>cp.AMCVS_*<br>cp.QuantumMetricSessi<br>onID<br>cp._uetsid<br>cp._uetvid<br>cp.mbox<br>cp._ga 13B5QB73DW | HTTP<br>POST body                                       | UPS package tracking number;<br>unique user/device id used by<br>Tealium for cross-domain<br>tracking; Google Ads<br>conversion-tracking cookie;<br>Facebook browser ID cookie;<br>Google Analytics client ID;<br>IBM Web Chat anonymous<br>user ID; Quantum Metric user<br>ID; UPS session ID; Adobe<br>Experience Cloud visitor ID;<br>Adobe Experience Cloud<br>session ID; Quantum Metric<br>session ID; Bing Ads session<br>ID; Bing Ads visitor ID;<br>Adobe Target personalization<br>ID; Google Analytics 4 session<br>cookie. |

|                                   |                                                                     |                                       |                                                                                                                                                         |
|-----------------------------------|---------------------------------------------------------------------|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| Google<br>(doubleclick<br>.net)   | ~oref<br>auiddc<br>gdid                                             | HTTP GET<br>querystring<br>parameter  | UPS package tracking number;<br>Google advertising tracking<br>identifiers.                                                                             |
| Facebook                          | _fbp<br>ev<br>dl<br>pmd[title]<br>pmd[keywords]<br>pmd[description] | HTTP GET<br>querystring<br>parameters | Facebook identifier; used for<br>cross-domain tracking and<br>advertising; Event-related data<br>such as PageView; URL and<br>page-related information. |
| Facebook                          | c_user                                                              | cookie                                | Facebook unique user ID, used<br>for cross-domain tracking and<br>advertising.                                                                          |
| (UPS and<br>all third<br>parties) | user-agent<br>IP address                                            | header;<br>network<br>layer           | user's device and browser<br>information; user's IP address                                                                                             |

36. When using the Widget to track a FedEx package, clicking the Track Button causes a large amount of data, besides the tracking number, to be sent to FedEx and to numerous third parties. Clicking the Track Button after entering a FedEx tracking number caused the user's browser, including Plaintiffs' browsers, to send **142 separate network requests** to at least nineteen different domains, including, at least: api.fedex.com, app.usercentrics.eu, assets.adobedtm.com, cdn.bfldr.com, cdn.optimizely.com, cm.everesttech.net, col.eum-appdynamics.com, consent-api.service.consent.usercentrics.eu, dpm.demdex.net, fedex.demdex.net, fedex.digital.nuance.com, match.adsrvr.org, media-us2.digital.nuance.com, smetrics.fedex.com, uct.service.usercentrics.eu, v1.api.service.cmp.usercentrics.eu, web.cmp.usercentrics.eu, www.fedex.com, and www.google.com. Below are just a few examples of the data that were sent to some of these domains immediately upon clicking the Track Button:

| Recipients      | Data Names                  | Data Type                | Description                              |
|-----------------|-----------------------------|--------------------------|------------------------------------------|
| FedEx and Adobe | v129                        | querystring<br>parameter | tracking number of the user's<br>package |
| FedEx           | fdx_cbid                    | cookie                   | a FedEx customer id or browser<br>id     |
| FedEx           | gcl_au,<br>gdl-<br>clientId | cookies                  | Google advertising identifiers           |

|                                            |                    |                       |                                                                                                                                    |
|--------------------------------------------|--------------------|-----------------------|------------------------------------------------------------------------------------------------------------------------------------|
| FedEx                                      | gdl-clientId       | cookie                | client ID used for Google Analytics and/or Tag Manager                                                                             |
| FedEx                                      | s_ecid, AMCV_*     | cookies               | Adobe Marketing Cloud identifiers, used for user tracking and marketing                                                            |
| FedEx, Adobe, The Trade Desk, Google, etc. | user-agent         | header                | reveals the user's browser and operating system                                                                                    |
| FedEx                                      | referrer           | header                | reveals the website from which the request originated                                                                              |
| FedEx                                      | accept-language    | header                | reveals the user's preferred language                                                                                              |
| FedEx and Adobe                            | s                  | querystring parameter | reveals the user's screen dimensions                                                                                               |
| Adobe                                      | demdex, dpm, dextp | cookies               | used by Adobe Audience Manager for user tracking, including to sync the Demdex ID with many external advertising and data partners |
| Adobe                                      | AMCV_*             | cookie                | used by Adobe Marketing Cloud for user tracking and marketing                                                                      |
| The Trade Desk                             | TDID, TDCPM        | cookies               | Used by The Trade Desk for user tracking and partner matching                                                                      |

37. Further, as the user, including each Plaintiff and Class member, continues to browse and interact with the carrier's website after selecting the Track Button, additional information is transmitted to the carrier and various third parties without the user's authorization or knowledge.

38. All of the network requests discussed above, in fact, occurred only after consumers gave their *specific and limited consent to the sharing of a single tracking number with one particular carrier*.

39. But the information that was transmitted after users, including both Plaintiffs and Class members, clicked or pressed the Track Button enabled the carriers and the Third Parties to obtain and deduce information about the user, including at least the following:

- 1 • **Shipping-Related Information:** Information about the shipping transaction, including  
2 sender location; shipping date; delivery date; tracking history; receipt history; name of  
3 recipient; and/or other reference information;
- 4 • **Browsing History:** Information about the webpages a user visits, including the URLs,  
5 titles, and keywords associated with the webpages viewed, time spent on each page,  
6 and navigation patterns;
- 7 • **Visit History:** Information about the frequency and total number of visits to the  
8 website;
- 9 • **Website Interactions:** Data on which links, buttons, or ads on the website a user  
10 clicks;
- 11 • **User Input Data:** The information the user entered into the website's form fields,  
12 including package tracking numbers, search queries, the user's name, age, gender,  
13 email address, location, and/or payment information;
- 14 • **Demographic Information:** Inferences about age, gender, and location based on  
15 browsing habits and interactions with website content;
- 16 • **Interests and Preferences:** Insights into user interests based on the types of website  
17 content viewed, products searched for, or topics engaged with;
- 18 • **Shopping Behavior:** Information about the website products and/or services viewed or  
19 added to shopping carts;
- 20 • **Device Information:** Details about the website user's device, such as the type of device  
21 (mobile, tablet, desktop), operating system, and browser type;
- 22 • **Referring URL:** Information about the website that referred the user to the website;
- 23 • **Session Information:** Details about the user's current website browsing session,  
24 including the exact date and time of the user's session, the session duration and actions  
25 taken on the website during that session;
- 26 • **User Identifiers:** A unique ID that is used to recognize and track a specific website  
27 user across different websites over time;
- 28

1       • **Geolocation Data:** General location information based on the website user’s IP address  
 2       or GPS data, if accessible, including whether the user is located in California.  
 3 (Collectively, the browsing activities and private communications listed in the bullet points  
 4 above shall be referred to herein as “Private Communications”).

5       40. The carriers and the Third Parties used the Private Communications to create  
 6 and enrich profiles of consumers to target advertisements to them, profile them, track them,  
 7 perform analytics on them, and for other purposes.

8       41. The HTTP requests made to Quantum Metric with respect to UPS tracking are  
 9 particularly troubling. The moment the user, including both Plaintiffs and Class members,  
 10 clicked or pressed the Track Button and was redirected to UPS’s website, the code on UPS’s  
 11 website caused the user’s browser to initiate a recording of the user’s screen/mouse movements  
 12 and keyboard inputs. The recording was sent in real time to Quantum Metric.

13       42. Defendants use their unauthorized tracking data to generate revenue for  
 14 themselves. In particular, Google integrates third-party resources with its services, and sells or  
 15 shares the user data it collects from its several services for advertising and other purposes.<sup>12</sup>  
 16 Likewise, on information and belief, UPS uses the data to target advertisements and other  
 17 marketing materials to consumers, profile and track consumers, and to improve the efficiency  
 18 of its services by analyzing user behavior.

19       **D. The Data Third Parties Receive as a Result of Defendants’ Package**  
 20       **Tracking System is Used to Track Consumers for Commercial Purposes.**

21       43. The data that Defendants’ Package Tracking System causes to be sent to third  
 22 parties without consumers’ knowledge or consent is used by those third parties to track  
 23 consumers for commercial purposes, as well as to build and enhance comprehensive profiles of  
 24 consumers, including Plaintiffs.

25       **1. Facebook**

26  
 27  
 28 <sup>12</sup> See generally <https://en.wikipedia.org/wiki/Google> (describing Google’s business model, accessed 4/3/26).

1           44. Facebook's tracking technology associates activity on other companies'  
2 websites with Facebook accounts for advertising, measurement and profile building. Facebook  
3 measures responses to advertisements, including across devices, and that information about a  
4 person's visit to another business's website, can be used to show that business's  
5 advertisements, or similar advertisements, on Facebook.

6           45. The following screenshots show the type of data that Facebook receives directly  
7 from the user's browser after users, including both Plaintiffs, click the Track Button on the  
8 Widget:  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

200

[illegible]

|                          |                                                                                                                                                                                                                                                                                                                                             |
|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| :scheme                  | https                                                                                                                                                                                                                                                                                                                                       |
| accept                   | image/avif,image/webp,image/apng,image/svg+xml,image/*/*;<br>q=0.8                                                                                                                                                                                                                                                                          |
| accept-encoding          | gzip, deflate, br, zstd                                                                                                                                                                                                                                                                                                                     |
| accept-language          | en-US,en;q=0.9                                                                                                                                                                                                                                                                                                                              |
| cache-control            | no-cache                                                                                                                                                                                                                                                                                                                                    |
| cookie                   | datr=F0Sualta8Fr3PFYq-BGFZE2n;<br>sb=F0SuaMUy3ZketDP4VyxLtp7; c_user=1345507951; ps_n=1;<br>xs=25%3AGPglyS2W0kVYyg%3A2%3A1758304996%3A-1%3A-1<br>%3A%3AAacX3E3t5zN6PZ2WalP1RUCDYvdn5WEcReqF2CHd5x_4;<br>fr=1n1oFJ6qmvTSWJ06e.AWdL6dZ6mVH_H1TQmolKjDM0cmkhhv<br>4s_3t3sUSxgBm9MTY88NM.Bo2qji..AAA.0.0.Bo2rr0.AWdt9L5r14J<br>oRMrADd211LoP52s |
| pragma                   | no-cache                                                                                                                                                                                                                                                                                                                                    |
| priority                 | i                                                                                                                                                                                                                                                                                                                                           |
| sec-ch-ua                | "Google Chrome";v="141", "Not?A_Brand";v="8",<br>"Chromium";v="141"                                                                                                                                                                                                                                                                         |
| sec-ch-ua-mobile         | ?0                                                                                                                                                                                                                                                                                                                                          |
| sec-ch-ua-platform       | "macOS"                                                                                                                                                                                                                                                                                                                                     |
| sec-fetch-dest           | image                                                                                                                                                                                                                                                                                                                                       |
| sec-fetch-mode           | no-cors                                                                                                                                                                                                                                                                                                                                     |
| sec-fetch-site           | cross-site                                                                                                                                                                                                                                                                                                                                  |
| sec-fetch-storage-access | active                                                                                                                                                                                                                                                                                                                                      |
| user-agent               | Mozilla/5.0 (Macintosh; Intel Mac OS X 10_15_7) AppleWebKit/<br>537.36 (KHTML, like Gecko) Chrome/141.0.0.0 Safari/537.36                                                                                                                                                                                                                   |
| Host                     | www.facebook.com                                                                                                                                                                                                                                                                                                                            |

200

[illegible]

|                   |                                                                                                                   |
|-------------------|-------------------------------------------------------------------------------------------------------------------|
| dpo               | LDU                                                                                                               |
| dpoco             | 0                                                                                                                 |
| dpost             | 0                                                                                                                 |
| ec                | 2                                                                                                                 |
| eid               | 1760569131821_1760569326183                                                                                       |
| ev                | PageView                                                                                                          |
| exp               | k2                                                                                                                |
| expv2[0]          | pI0                                                                                                               |
| expv2[1]          | eI3                                                                                                               |
| expv2[2]          | bc1                                                                                                               |
| fbp               | fb.1.1756917607880.570809143800702874.Bg                                                                          |
| id                | 286726385262010                                                                                                   |
| if                | false                                                                                                             |
| it                | 1760569326001                                                                                                     |
| ler               | empty                                                                                                             |
| ncud[country]     | **                                                                                                                |
| ncud[ct]          | *****                                                                                                             |
| ncud[external_id] | %23%23%23%23%23%23%23%23%23%23*%23*%23%23%23****<br>%23%23****%23*%23%23%23%23%23%23%23*%23%23%23*<br>%23%23%23** |
| ncud[st]          | **                                                                                                                |
| o                 | 12318                                                                                                             |
| plt               | 846.2000000029802                                                                                                 |

GET

| Request | Header                                                                                                                   | Query | Body | Cookies | Raw | Summary | + |
|---------|--------------------------------------------------------------------------------------------------------------------------|-------|------|---------|-----|---------|---|
| Key     | Value                                                                                                                    |       |      |         |     |         |   |
| datr    | F0Sualta8Fr3PFyq-BGFZE2n                                                                                                 |       |      |         |     |         |   |
| sb      | F0SuaMUy3ZketDP4VyxLttp7                                                                                                 |       |      |         |     |         |   |
| c_user  | 1345507951                                                                                                               |       |      |         |     |         |   |
| ps_n    | 1                                                                                                                        |       |      |         |     |         |   |
| xs      | 25%3AGPglyS2W0kVYyg%3A2%3A1758304996%3A-1%3A-1%3A%3AAcX3E3t5zN6PZ2WaiP1RUCDYvdn5WEcReqF2CHd5x_4                          |       |      |         |     |         |   |
| fr      | 1n1oFJ6qmvTSWJ06e.AWdL6dZ6mVH_H1TQmolKjDM0cmkhhv4s_3t3sUSxgBm9MTY88NM.Bo2qji...AAA.0.0.Bo2rr0.AWdt9L5r14JoRMrAd211LoP52s |       |      |         |     |         |   |

46. The **dl** parameter corresponds to the “document location”—the URL on the UPS website the user is visiting. As shown above, the value in the **dl** parameter includes the exact UPS tracking number that the user had entered into Defendants’ Package Tracking System.

47. The **ev** parameter identifies the event the user is performing on the website. As shown above, the user is performing a “PageView” event.

48. The parameters beginning with **pmd** correspond to Facebook’s Preferred Marketing Developer program. In the example shown above, the values of these parameters disclose to Facebook that the user was tracking a package within the United States.

49. The **ts** parameter corresponds to a “timestamp,” and tells Facebook the exact time—down to the millisecond—at which the user tracked the package.

50. The **c\_user** cookie contains the user’s Facebook account ID in plaintext. This cookie allows Facebook to identify a logged-in user and, combined with other data sent to the Facebook domain, to track that user’s activity on its platform and across sites that use Facebook plugins, such as adding items to a cart, clicking “Like” buttons, or engaging with comment sections. Meta uses this data to personalize content, target advertising, build user profiles and refine its user experience.<sup>13</sup>

51. The **fbp** parameter corresponds to the user’s Facebook browser ID.<sup>14</sup> This permits Facebook to associate the user’s activity on a website over time even when a user is not logged into Facebook.

52. The **user-agent** header discloses to Facebook the user’s specific device type, operating system, and browser.

53. In addition, as part of every network call made to Facebook after the user clicks the Widget’s Track Button, Facebook receives the user’s IP address, which further enables

---

<sup>13</sup> See, e.g., <https://perma.cc/Z3D5-DSTD> (capture of <https://arxiv.org/html/2603.09380v1#S2.SS2> as it appeared on 10/4/2026).

<sup>14</sup> See *id.* See also <https://perma.cc/XG7R-M99U> (capture of <https://javadoc.io/static/com.facebook.business.sdk/facebook-java-business-sdk/23.0.6/com/facebook/ads/sdk/serverside/UserData.html> as it appeared on 10/4/2026).

## Proof of Delivery

Tracking Number

## CLASS ACTION COMPLAINT

## Package History

---

|                          |                                                                                   |
|--------------------------|-----------------------------------------------------------------------------------|
| 08/19/2026<br>12:35 P.M. | <b>Delivered</b><br>DELIVERED<br>VANCOUVER, WA, US                                |
| 08/19/2026<br>8:52 A.M.  | <b>Out for Delivery</b><br>Out For Delivery Today<br>Vancouver, WA, United States |
| 08/19/2026<br>6:27 A.M.  | <b>On the Way</b><br>Loaded on Delivery Vehicle<br>Vancouver, WA, United States   |
| 08/19/2026<br>6:23 A.M.  | Processing at UPS Facility<br>Vancouver, WA, United States                        |
| 08/19/2026<br>1:25 A.M.  | Arrived at Facility<br>Vancouver, WA, United States                               |
| 08/19/2026<br>1:02 A.M.  | Departed from Facility<br>Portland, OR, United States                             |
| 08/18/2026<br>4:26 P.M.  | Arrived at Facility<br>Portland, OR, United States                                |
| 08/18/2026<br>2:39 P.M.  | Departed from Facility<br>Louisville, KY, United States                           |
| 08/18/2026<br>10:58 A.M. | Arrived at Facility<br>Louisville, KY, United States                              |

|                          |                                                            |
|--------------------------|------------------------------------------------------------|
| 08/18/2026<br>8:03 A.M.  | Departed from Facility<br>Miami, FL, United States         |
| 08/18/2026<br>7:50 A.M.  | Arrived at Facility<br>Miami, FL, United States            |
| 08/18/2026<br>6:42 A.M.  | Arrived at Facility<br>Miami, FL, United States            |
| 08/18/2026<br>6:12 A.M.  | Departed from Facility<br>Hialeah, FL, United States       |
| 08/18/2026<br>1:14 A.M.  | Arrived at Facility<br>Hialeah, FL, United States          |
| 08/17/2026<br>11:45 P.M. | Departed from Facility<br>Riviera Beach, FL, United States |

(tracking number blurred for privacy).

55. Accordingly, by providing Facebook with the user's tracking number, Defendants enabled Facebook to obtain extensive additional information about the user and the package.

## 2. Google (DoubleClick and Google Analytics)

56. DoubleClick is Google's advertising platform. The following screenshots show the type of data that Google DoubleClick receives directly from the user's browser after the user clicks the Widget's Track Button:

302

| Key | Value |
|-----|-------|
|-----|-------|

## CLASS ACTION COMPLAINT

|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| :scheme                  | https                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| accept                   | image/avif,image/webp,image/apng,image/svg+xml,image/*/*/*;q=0.8                                                                                                                                                                                                                                                                                                                                                                                                                        |
| accept-encoding          | gzip, deflate, br, zstd                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| accept-language          | en-US,en;q=0.9                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| cache-control            | no-cache                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| cookie                   | receive-cookie-deprecation=1; ar_debug=1;<br>DSID=AEhM4McefXwqz8f7lajTk1dD9mRwi0dNfzpTcnUKgbBLa7-<br>djid4A0d2-<br>bB38dzQM9mC7Pfiya5S49yq_8qW9NLrFJy2pm2AOZXBjJfI9FgyFW<br>AdCLOCy8otR8-<br>dNNJet61cSdV63e3T_Qc3rdUzcAhjeJ5W0gP4gbJZwVvkC61DGA8m<br>1uXpyg94GvpYZo6rFxEPEX2K7VA-<br>YjIJbvHsabpkSCbLaxOvOFFKILiINykUok-88uSwPCSWBkSnQ2tq-<br>PcPzTxsBh0NgOv1VKdyT1FKI_ea3npQoolgPgHULgVPoV24oqCXNS<br>sQ; IDE=AHWqTUmAe-_EJaQ-P8HgGFYcigvORJd1JWx6Ljqj-<br>aPVyPI5TVzgrCUXtMEDVdowHDM |
| Host                     | googleads.g.doubleclick.net                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| pragma                   | no-cache                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| priority                 | i                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| sec-ch-ua                | "Google Chrome";v="141", "Not?A_Brand";v="8",<br>"Chromium";v="141"                                                                                                                                                                                                                                                                                                                                                                                                                     |
| sec-ch-ua-mobile         | ?0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| sec-ch-ua-platform       | "macOS"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| sec-fetch-dest           | image                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| sec-fetch-mode           | no-cors                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| sec-fetch-site           | cross-site                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| sec-fetch-storage-access | active                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| user-agent               | Mozilla/5.0 (Macintosh; Intel Mac OS X 10_15_7) AppleWebKit/<br>537.36 (KHTML, like Gecko) Chrome/141.0.0.0 Safari/537.36                                                                                                                                                                                                                                                                                                                                                               |
| x-browser-channel        | stable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| x-browser-copyright      | Copyright 2025 Google LLC. All rights reserved.                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| x-browser-validation     | qSH0RgPhYS+tEktJTy2ahvLDO9s=                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| x-browser-year           | 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| x-client-data            | CJS2yQElorbJAQipncoBCNGgygEIhIvLAQiTocsBCIagzQEIjo7PAQjsjs<br>8B                                                                                                                                                                                                                                                                                                                                                                                                                        |

https://googleads.g.doubleclick.net/pagead/viewthroughcon  
c=1&en=conversion&gtm=45be5ae1v896817873za200zb9179590599:  
004~103233427~104527907~104528500~104684208~104684211~104  
ps%3A%2F%2Fwww.ups.com%2Ftrack%3Ftrack%3Dyes%26trackNums%  
gment&gtm\_ee=1&frm=0&tiba=Tracking%20%7C%20UPS%20-%20Unit  
&auid=1779829067.1756917608&uaa=arm&uab=64&uafvl=Google%2!  
amb=0&uam=&uap=macOS&uapv=15.6.1&uaw=0&capi=1&\_tu=CA&gcl\_  
&fmt=3&ct\_cookie\_present=false&eoid=CkAKEQjwjL3HBhDJnqCUG.  
sQIIobixAgixwbECCLDBsQIIscOxAgikxbECCMLJsQIIItMaxAgim2bECCl  
csQJJK25vdC1uYXZpZ2F0aW9uLXNvdXJjZSwgdHJpZ2dldmVudC1zI  
H9Qf6DPMQyXF5SRyZL\_Z5vvZxQO\_RS6Fk7VKosxCBb8&pserd=IhMI55.  
CGIICAAQABgAIAAyDAGJYggIABAAGAAgADIMCApiCAgAEAAAYACAAMgwIA  
AGAAgADIMCBjiCAgAEAAAYACAALZDaEFJOEl50Xh3WVFyY1BqcC1lZHRjl  
9VQXoMCAliCAgAEAAAYACAA

GET

302

Request Header Query Body Cookies Raw Summary +

| Key               | Value                                                                                                                                                                                                                                    |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| _tu               | CA                                                                                                                                                                                                                                       |
| async             | 1                                                                                                                                                                                                                                        |
| auid              | 1779829067.1756917608                                                                                                                                                                                                                    |
| bg                | ffffff                                                                                                                                                                                                                                   |
| capi              | 1                                                                                                                                                                                                                                        |
| cerd              | CgEA                                                                                                                                                                                                                                     |
| crd               | CPLOsQIIobixAgixwbECCLDBsQIIscOxAgikxbECCMLJsQIIItMaxAgim<br>2bECCPvYsQIIws-xAgj-1bECCIfbsQII08WxAgjrzLECCO3OsQII1c-<br>xAgju0LECCJfUsQIIyduxAgjK2bECCMbsQJJK25vdC1uYXZpZ2F0a<br>W9uLXNvdXJjZSwgdHJpZ2dldmVudC1zb3VyY2VaAwoBAWIDCg<br>ED |
| ct_cookie_present | false                                                                                                                                                                                                                                    |
| cv                | 11                                                                                                                                                                                                                                       |
| data              | event=conversion;google_segments=Global~ArchetypeUrgentDocs<br>RTG                                                                                                                                                                       |
| did               | dYmQxMT                                                                                                                                                                                                                                  |
| dma               | 0                                                                                                                                                                                                                                        |
| en                | conversion                                                                                                                                                                                                                               |

|         |                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| eoid    | CkAKEQjwJL3HBhDjNqCUgJPbs5YBEisAR4Wi6qt8YKJKyM2QPYtJs<br>1uc5kdy8inJjnPI_muOwPH-_SJB6k-Bnfae8P8HAQ                                                                                                                                                                                                                                                                                                                                |
| fmt     | 3                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| frm     | 0                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| fsk     | ChAl8ly9xwYQmYyz76fmz6BIeiwAbYLBkioQMDyF-8qezIJH9Qf6DP<br>MQyXF5SRyZL_Z5vvZxQO_RS6Fk7VKosxoCBb8                                                                                                                                                                                                                                                                                                                                   |
| fst     | 1760569327295                                                                                                                                                                                                                                                                                                                                                                                                                     |
| gcd     | 13t3t3t3t5l1                                                                                                                                                                                                                                                                                                                                                                                                                      |
| gcl_ctr | 22~0                                                                                                                                                                                                                                                                                                                                                                                                                              |
| gcs     | G111                                                                                                                                                                                                                                                                                                                                                                                                                              |
| gdid    | dYmQxMT                                                                                                                                                                                                                                                                                                                                                                                                                           |
| gtm     | 45be5ae1v896817873za200zb9179590599zd9179590599xec                                                                                                                                                                                                                                                                                                                                                                                |
| gtm_ee  | 1                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| guid    | ON                                                                                                                                                                                                                                                                                                                                                                                                                                |
| hn      | www.googleadservices.com                                                                                                                                                                                                                                                                                                                                                                                                          |
| label   | google_segment                                                                                                                                                                                                                                                                                                                                                                                                                    |
| npa     | 0                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| pscdl   | noapi                                                                                                                                                                                                                                                                                                                                                                                                                             |
| pscrd   | lhMI55_z6qenkAMV5rZ_BB0CoBLeMgwIA2IICAAQABgAIAAyDAgEYg<br>glABAAGAAgADIMCAdiCagAEAAyACAAMgwICglIICAAQABgAIAAyDA<br>gJYggIABAAGAAgADIMCApiCagAEAAyACAAMgwIAmIICAAQABgAIA<br>AyDAgLYggIABAAGAAgADIMCBViCagAEAAyACAAMgwIH2IICAAQAB<br>gAIAAyDAgTYggIABAAGAAgADIMCBJiCagAEAAyACAAQIZDaEFJOEI<br>5OXh3WVFyY1BqcC1IZHRjNFZFaXdBNDFMdGw0TFZhTknvbkNsRn<br>ILNHZJak5vREI2Y1lyM0x3MG1hc3gxWkxTZmJNcTVVcVBicVIZWG9<br>VQXoMCAliCagAEAAyACAA |
| random  | 986041599                                                                                                                                                                                                                                                                                                                                                                                                                         |
| tag_exp | 101509157~103116026~103200004~103233427~104527907~1<br>04528500~104684208~104684211~104948813~105322303~11<br>5480709~115616985~115938466~115938469                                                                                                                                                                                                                                                                               |
| tiba    | Tracking   UPS - United States                                                                                                                                                                                                                                                                                                                                                                                                    |
| u_h     | 1440                                                                                                                                                                                                                                                                                                                                                                                                                              |
| u_w     | 2560                                                                                                                                                                                                                                                                                                                                                                                                                              |
| uaa     | arm                                                                                                                                                                                                                                                                                                                                                                                                                               |
| uab     | 64                                                                                                                                                                                                                                                                                                                                                                                                                                |
| uafvl   | Google%20Chrome;141.0.7390.78 Not%3FA_Brand;8.0.0.0 <br>Chromium;141.0.7390.78                                                                                                                                                                                                                                                                                                                                                    |
| uam     |                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| uamb    | 0                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| uap     | macOS                                                                                                                                                                                                                                                                                                                                                                                                                             |
| uapv    | 15.6.1                                                                                                                                                                                                                                                                                                                                                                                                                            |
| uaw     | 0                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| url     | https://www.ups.com/track?<br>track=yes&trackNums=1Z0189V40396763440&loc=en_US&reques<br>ter=ST/trackdetails                                                                                                                                                                                                                                                                                                                      |

https://googleads.g.doubleclick.net/pagead/viewthroughconversion=1&en=conversion&gtm=45be5ae1v896817873za200zb9179590599za004~103233427~104527907~104528500~104684208~104684211~1049ps%3A%2F%2Fwww.ups.com%2Ftrack%3Ftrack%3Dyes%26trackNums%3Igment&gtm\_ee=1&frm=0&tiba=Tracking%20%7C%20UPS%20-%20Unit&auid=1779829067.1756917608&uaa=arm&uab=64&uafvl=Google%25amb=0&uam=&uap=macOS&uapv=15.6.1&uaw=0&capi=1&\_tu=CA&gcl\_c&fmt=3&ct\_cookie\_present=false&eid=CkAKEQjwjL3HBhDJnqCUgJIsQIIobixAgixwbECCLDbsQIIsc0xAgIKxbECCMLJsQIIItMaxAgim2bECCPcsQJKK25vdC1uYXZpZ2F0aW9uLXNvdXJjZSwgdHJpZ2d1cjtldmVudC1zbH9Qf6DPMQyXF5SRyZL\_Z5vvZxQ0\_RS6Fk7VKosxocBb8&pscrd=IhMI55\_CGIICAAQABgAIAAyDAgJYggIABAAGAAgADIMCApiCagAEAAAYACAAMgwIAmAGAAgADIMCBjiCagAEAAAYACAALZDaEFJOE150Xh3WVFyY1BqcC11ZHRjNl9VQXoMCAliCagAEAAAYACAA

GET 302

Request Header Query Body Cookies Raw Summary +

| Key                        | Value                                                                                                                                                                                                                                                                                                                   |
|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ar_debug                   | 1                                                                                                                                                                                                                                                                                                                       |
| DSID                       | AEHM4McefXwqz8f7IajTk1dD9mRwi0dNfzpTcnUKgbBLa7-djid4A0d2-bB38dzQM9mC7Pfiya5S49yq_8qW9NlrFJy2pm2AOZXBjJfI9FgyFWAdCLOCy8otR8-dNNJet61cSdV63e3T_Qc3rdUzcAhjeJ5W0gP4gbJZwVvkC61DGA8m1uXpyg94GvpYZo6rFxEPEx2K7VA-YjIJbvHsabpkSCbLaxOvOFFkLiINykUok-88uSwPCSWBkSnQ2tq-PcPzTxsBh0NgOv1VKdyT1FKl_ea3npQoolgPgHULgVPoV24oqCXNSsQ |
| IDE                        | AHWqTUmAe-_EJaQ-P8HgGFYcigvORJd1JWx6LjqiaPVyPI5TVzgrCUXtMEDVdowHDM                                                                                                                                                                                                                                                      |
| receive-cookie-deprecation | 1                                                                                                                                                                                                                                                                                                                       |

57. The **tiba** parameter discloses to Google the title of the page the user was viewing. Here, the title reveals that the user was tracking a package on the UPS website.

58. The **url** parameter discloses to Google the URL that the user was viewing. As shown above, this includes the exact UPS tracking number the user had entered into the Widget.

59. The **u\_h** and **u\_w** parameters correspond to the user's screen height and width.

60. Google documentation confirms that the **IDE** cookie is used for advertising. Specifically, it is "used to show Google ads on non-Google sites."<sup>15</sup>

<sup>15</sup> <https://perma.cc/3ADN-YP6J> (capture of <https://policies.google.com/technologies/cookies?hl=en-US> as it appeared on 10/4/2026).

1           61. The **user-agent** header discloses to Google the user's specific device type,  
2 operating system, and browser.

3           62. In addition, as part of every network call made to Google after the user clicks  
4 the Track Button, Google receives the user's IP address, which further enables Google to  
5 identify the user and to deduce the user's geolocation, including whether the user is located  
6 within California.

7           63. In addition to receiving data from the consumer through its DoubleClick  
8 platform, Google receives consumer data through its Google Analytics platform. The following  
9 screenshots show the type of data that Google Analytics receives directly from the user's  
10 browser after the user clicks the Track Button:

POST

204

https://www.google-analytics.com/g/collect?v=2&tid=G-13B5QB11&gcd=13t3t3t3t5l1&npa=0&dma=0&gdid=dYmQxMT&cid=1844917945exp=101509157~103116026~103200004~103233427~104527907~104528466~115938468&sid=1760569136&sct=2&seg=1&dl=https%3A%2F%2F%26requester%3DST%2Ftrackdetails&dt=Tracking%20%7C%20UPS%20

Request Header Query Body Cookies Raw Summary +

| Key                      | Value                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| :authority               | www.google-analytics.com                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| :method                  | POST                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| :path                    | /g/collect?v=2&tid=G-13B5QB73DW&gtm=45be5ae1v894646195za200zb9179590599zd9179590599&_p=1760569325650&gcs=G111&gcd=13t3t3t3t5l1&npa=0&dma=0&gdid=dYmQxMT&cid=1844917945.1756917608&ul=en-us&are=1&frm=0&pscdl=noapi&_eu=AAAAAAQ&_geo=1&_rdi=1&_s=1&tag_exp=101509157~103116026~103200004~103233427~104527907~104528500~104684208~104684211~104869650~104948813~105322304~115480710~115616985~115938466~115938468&sid=1760569136&sct=2&seg=1&dl=https%3A%2F%2Fwww.ups.com%2Ftrack%3Ftrack%3Dyes%26trackNums%3D1Z0189V40396763440%26loc%3Den_US%26requester%3DST%2Ftrackdetails&dt=Tracking%20%7C%20UPS%20%20United%20States&_tu=KA&en=page_view&_ee=1&tfd=7177 |
| :scheme                  | https                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| accept                   | */*                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| accept-encoding          | gzip, deflate, br, zstd                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| accept-language          | en-US,en;q=0.9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| cache-control            | no-cache                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| content-length           | 0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| cookie                   | ar_debug=1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Host                     | www.google-analytics.com                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| origin                   | https://www.ups.com                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| pragma                   | no-cache                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| priority                 | u=1, i                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| sec-ch-ua                | "Google Chrome";v="141", "Not?A_Brand";v="8", "Chromium";v="141"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| sec-ch-ua-mobile         | ?0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| sec-ch-ua-platform       | "macOS"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| sec-fetch-dest           | empty                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| sec-fetch-mode           | no-cors                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| sec-fetch-site           | cross-site                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| sec-fetch-storage-access | active                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| user-agent               | Mozilla/5.0 (Macintosh; Intel Mac OS X 10_15_7) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/141.0.0.0 Safari/537.36                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

POST

204

https://www.google-analytics.com/g/collect?v=2&tid=G-13B5QB11&gcd=13t3t3t3t5l1&npa=0&dma=0&gdid=dYmQxMT&cid=1844917945exp=101509157~103116026~103200004~103233427~104527907~104528466~115938468&sid=1760569136&sct=2&seg=1&dl=https%3A%2F%2F%26requester%3DST%2Ftrackdetails&dt=Tracking%20%7C%20UPS%20

| Request | Header                                                                                                                                                | Query | Body | Cookies | Raw | Summary | + |
|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------|-------|------|---------|-----|---------|---|
| Key     | Value                                                                                                                                                 |       |      |         |     |         |   |
| _ee     | 1                                                                                                                                                     |       |      |         |     |         |   |
| _eu     | AAAAAAQ                                                                                                                                               |       |      |         |     |         |   |
| _geo    | 1                                                                                                                                                     |       |      |         |     |         |   |
| _p      | 1760569325650                                                                                                                                         |       |      |         |     |         |   |
| _rdi    | 1                                                                                                                                                     |       |      |         |     |         |   |
| _s      | 1                                                                                                                                                     |       |      |         |     |         |   |
| _tu     | KA                                                                                                                                                    |       |      |         |     |         |   |
| are     | 1                                                                                                                                                     |       |      |         |     |         |   |
| cid     | 1844917945.1756917608                                                                                                                                 |       |      |         |     |         |   |
| dl      | https://www.ups.com/track?track=yes&trackNums=1Z0189V40396763440&loc=en_US&requester=ST/trackdetails                                                  |       |      |         |     |         |   |
| dma     | 0                                                                                                                                                     |       |      |         |     |         |   |
| dt      | Tracking   UPS - United States                                                                                                                        |       |      |         |     |         |   |
| en      | page_view                                                                                                                                             |       |      |         |     |         |   |
| frm     | 0                                                                                                                                                     |       |      |         |     |         |   |
| gcd     | 13t3t3t3t5l1                                                                                                                                          |       |      |         |     |         |   |
| gcs     | G111                                                                                                                                                  |       |      |         |     |         |   |
| gdid    | dYmQxMT                                                                                                                                               |       |      |         |     |         |   |
| gtm     | 45be5ae1v894646195za200zb9179590599zd9179590599                                                                                                       |       |      |         |     |         |   |
| npa     | 0                                                                                                                                                     |       |      |         |     |         |   |
| pscdl   | noapi                                                                                                                                                 |       |      |         |     |         |   |
| sct     | 2                                                                                                                                                     |       |      |         |     |         |   |
| seg     | 1                                                                                                                                                     |       |      |         |     |         |   |
| sid     | 1760569136                                                                                                                                            |       |      |         |     |         |   |
| tag_exp | 101509157~103116026~103200004~103233427~104527907~104528500~104684208~104684211~104869650~104948813~105322304~115480710~115616985~115938466~115938468 |       |      |         |     |         |   |
| tfd     | 7177                                                                                                                                                  |       |      |         |     |         |   |
| tid     | G-13B5QB73DW                                                                                                                                          |       |      |         |     |         |   |
| ul      | en-us                                                                                                                                                 |       |      |         |     |         |   |
| v       | 2                                                                                                                                                     |       |      |         |     |         |   |

1           64. Just like the DoubleClick platform, the Analytics platform receives parameters  
2 **(dl and dt)** that disclose to Google the URL and title, respectively, of the webpage the user  
3 was viewing. As shown above, this includes the exact tracking number the user had entered  
4 into the Widget.

5           65. The **cid** parameter stands for “Client ID.” It is a browser identifier, enabling  
6 Google to distinguish the user’s activity from that of other users.

7           66. The **sid** parameter stands for “Session ID.” It associates events performed by  
8 the user with a particular visit.

9           67. The **npa** parameter refers to “Non-Personalized Ads.” When npa is set to 1, it  
10 indicates non-personalized ads preference is enabled. Here, npa is set to 0, indicating that  
11 standard (personalized) ads are enabled.

12           68. Further, the Analytics platform receives the user-agent header, as well as the  
13 user’s IP address.

14           69. As discussed above with respect to Facebook, anyone who obtains a tracking  
15 number can obtain extensive information regarding the recipient and the shipment.  
16 Accordingly, by providing Google Analytics and Google DoubleClick with the user’s tracking  
17 number, Defendants enabled those platforms to obtain extensive additional information about  
18 the user and the shipment.

### 19                   **3. Adobe**

20           70. The UPS website is configured to cause the user’s browser to send data to  
21 Adobe when consumers use the Widget. The URL to which the data is sent is  
22 <https://smetrics.ups.com>, which is an alias for [ups.com.ssl.sc.omtrdc.net](https://ups.com.ssl.sc.omtrdc.net)—a domain controlled  
23 by Adobe.  
24

25           71. The following screenshots show the type of data that Adobe receives at that  
26 domain immediately after a consumer presses the Widget’s Track Button:  
27  
28

https://smetrics.ups.com/b/ss/upsprod/1/JS-2.26.0/s5636301  
 2F92-477061F6B80F40A3&mid=21636732702006598393454844519127  
 ck&g=https%3A%2F%2Fwww.ups.com%2Ftrack%3Ftrack%3Dyes%26tr  
 isitNum=4.2&getTimeSinceLastVisit=2.0&formatTime=2.0&getNe  
 t224%2Cevent226%2Cevent233%2Cevent230%2Cevent156%3Dnull%2C  
 6pguXWp5olkAcUniQYPHaMWgdJ3xzPWQmdj0y&c1=tracking%2Ftrack  
 tra%283det%29.html&c5=en&c6=US&v6=16&c13=https%3A%2F%2Fwww  
 equester%3DST%2Ftrackdetails&v14=https%3A%2F%2Fwww.ups.com  
 %3DST%2Ftrackdetails&c17=ups%7Cnova%7Cprod%7Cut4.52.202516  
 23=Repeat&c24=21636732702006598393454844519127024459&c25=1  
 3967634&v37=https%3A%2F%2Fwww.ups.com%2Ftrack&v39=Repeat&c  
 ff67ffbd6c0507500c906d009dc&v55=ups.com&c70=375&v75=en\_US&  
 569131821\_1760569326183&v135=935-KKE-240&v171=en&v172=US&  
 v219=GPC%3A%20false%20%7C%20PPWA%3A%20false&v231=a729ad0b-  
 =036784BD57A8BB277F000101%40AdobeOrg&AQE=1

GET

200

Request Header Query Body Cookies Raw Summary +

| Key                | Value                                                                                                                     |
|--------------------|---------------------------------------------------------------------------------------------------------------------------|
| :authority         | smetrics.ups.com                                                                                                          |
| :method            | GET                                                                                                                       |
| :path              | /b/ss/upsprod/1/JS-2.26.0/s56363014427714?<br>AQB=1&ndh=1&pf=1&t=15%2F9%2F2025%2016%3A2%3A6%203                           |
| :scheme            | https                                                                                                                     |
| accept             | image/avif,image/webp,image/apng,image/svg+xml,image/*/*;q=0.8                                                            |
| accept-encoding    | gzip, deflate, br, zstd                                                                                                   |
| accept-language    | en-US,en;q=0.9                                                                                                            |
| cache-control      | no-cache                                                                                                                  |
| cookie             | ups_language_preference=en_US;<br>CONSENTMGR=consent:true%7Cts:1756917607488;                                             |
| Host               | smetrics.ups.com                                                                                                          |
| pragma             | no-cache                                                                                                                  |
| priority           | i                                                                                                                         |
| sec-ch-ua          | "Google Chrome";v="141", "Not?A_Brand";v="8",<br>"Chromium";v="141"                                                       |
| sec-ch-ua-mobile   | ?0                                                                                                                        |
| sec-ch-ua-platform | "macOS"                                                                                                                   |
| sec-fetch-dest     | image                                                                                                                     |
| sec-fetch-mode     | no-cors                                                                                                                   |
| sec-fetch-site     | same-site                                                                                                                 |
| user-agent         | Mozilla/5.0 (Macintosh; Intel Mac OS X 10_15_7) AppleWebKit/<br>537.36 (KHTML, like Gecko) Chrome/141.0.0.0 Safari/537.36 |

GET

200

https://smetrics.ups.com/b/ss/upsprod/1/JS-2.26.0/s5636301  
 2F92-477061F6B80F40A3&mid=21636732702006598393454844519127  
 ck&g=https%3A%2F%2Fwww.ups.com%2Ftrack%3Ftrack%3Dyes%26tra  
 isitNum=4.2&getTimeSinceLastVisit=2.0&formatTime=2.0&getNe  
 t224%2Cevent226%2Cevent233%2Cevent230%2Cevent156%3Dnull%2C  
 6pguXWp5olkAcUniQYPHaMWWgdJ3xzPWQmdj0y&c1=tracking%2Ftrack  
 tra%283det%29.html&c5=en&c6=US&v6=16&c13=https%3A%2F%2Fwww  
 equester%3DST%2Ftrackdetails&v14=https%3A%2F%2Fwww.ups.com  
 %3DST%2Ftrackdetails&c17=ups%7Cnova%7Cprod%7Cut4.52.202510  
 23=Repeat&c24=21636732702006598393454844519127024459&c25=1  
 3967634&v37=https%3A%2F%2Fwww.ups.com%2Ftrack&v39=Repeat&c  
 ff67ffbd6c0507500c906d009dc&v55=ups.com&c70=375&v75=en\_US&  
 569131821\_1760569326183&v135=935-KKE-240&v171=en&v172=US&  
 v219=GPC%3A%20false%20%7C%20PPWA%3A%20false&v231=a729ad0b-  
 =036784BD57A8BB277F000101%40AdobeOrg&AQE=1

Request Header Query Body Cookies Raw Summary +

| Key   | Value                                                                                                        |
|-------|--------------------------------------------------------------------------------------------------------------|
| .c    |                                                                                                              |
| aamb  | RKhpRz8krq2tLO6pguXWp5olkAcUniQYPHaMWWgdJ3xzPWQmdj0y                                                         |
| aamlh | 9                                                                                                            |
| AQB   | 1                                                                                                            |
| AQE   | 1                                                                                                            |
| bh    | 1066                                                                                                         |
| bw    | 792                                                                                                          |
| c     | 30                                                                                                           |
| c.    |                                                                                                              |
| c1    | tracking/trackWeb/tra(3det).html                                                                             |
| c13   | https://www.ups.com/track?<br>track=yes&trackNums=1Z0189V40396763440&loc=en_US&reques<br>ter=ST/trackdetails |
| c17   | ups nova prod ut4.52.202510070405 - -                                                                        |
| c18   | https://www.ups.com/track                                                                                    |
| c19   | 16                                                                                                           |
| c2    | simplified_tracking_details                                                                                  |

|            |                                                                                                                     |
|------------|---------------------------------------------------------------------------------------------------------------------|
| c22        | guest                                                                                                               |
| c23        | Repeat                                                                                                              |
| c24        | 21636732702006598393454844519127024459                                                                              |
| c25        | ups:us:en:track                                                                                                     |
| c27        | 14                                                                                                                  |
| c29        | AEM                                                                                                                 |
| c33        | simplified_tracking_site_sub_area                                                                                   |
| c4         | tracking/trackWeb/tra(3det).html                                                                                    |
| c43        | track                                                                                                               |
| c5         | en                                                                                                                  |
| c51        | www.ups.com                                                                                                         |
| c6         | US                                                                                                                  |
| c70        | 375                                                                                                                 |
| cdp        | 2                                                                                                                   |
| ce         | UTF-8                                                                                                               |
| ch         | simplified_tracking_site_area                                                                                       |
| events     | event213,event214,event224,event226,event233,event230,event156=null,event157=627,event155=14,event243=171,event206= |
| formatTime | 2.0                                                                                                                 |
| g          | https://www.ups.com/track?<br>track=yes&trackNums=1Z0189V40396763440&loc=en_US&requester=ST/trackdetails            |

|    |                       |                                                                                                          |
|----|-----------------------|----------------------------------------------------------------------------------------------------------|
| 1  | getNewRepeat          | 3.0                                                                                                      |
| 2  | getTimeSinceLastVisit | 2.0                                                                                                      |
| 3  | getVisitNum           | 4.2                                                                                                      |
| 4  | j                     | 1.6                                                                                                      |
| 5  | k                     | Y                                                                                                        |
| 6  | mcorgid               | 036784BD57A8BB277F000101@AdobeOrg                                                                        |
| 7  | mid                   | 21636732702006598393454844519127024459                                                                   |
| 8  | ndh                   | 1                                                                                                        |
| 9  | ns                    | unitedparcelservice                                                                                      |
| 10 | pageName              | ups:us:en:track                                                                                          |
| 11 | pf                    | 1                                                                                                        |
| 12 | s                     | 2560x1440                                                                                                |
| 13 | sdid                  | 1916AF3170332F92-477061F6B80F40A3                                                                        |
| 14 | t                     | 15/9/2025 16:2:6 3 420                                                                                   |
| 15 | v                     | N                                                                                                        |
| 16 | v135                  | 935-KKE-240                                                                                              |
| 17 | v14                   | https://www.ups.com/track?<br>track=yes&trackNums=1Z0189V40396763440&loc=en_US&requester=ST/trackdetails |
| 18 | v171                  | en                                                                                                       |
| 19 | v172                  | US                                                                                                       |
| 20 | v188                  | App                                                                                                      |
| 21 | v19                   | guest                                                                                                    |
| 22 | v206                  | 7ada5a4711638c9a30e7657bf748ecd <br>841292bb1e6c62d17c29253e8d8dd7fe                                     |
| 23 | v219                  | GPC: false   PPWA: false                                                                                 |
| 24 | v231                  | a729ad0b-95fc-4aec-ae7b-b22a1a2ba2b9                                                                     |
| 25 | v35                   | V403967634                                                                                               |
| 26 | v37                   | https://www.ups.com/track                                                                                |
| 27 | v39                   | Repeat                                                                                                   |
| 28 | v49                   | www.ups.com                                                                                              |
|    | v50                   | 1760569131821                                                                                            |
|    | v51                   | 019910732c3d001efeff67ffbd6c0507500c906d009dc                                                            |
|    | v55                   | ups.com                                                                                                  |
|    | v6                    | 16                                                                                                       |
|    | v75                   | en_US                                                                                                    |
|    | v77                   | 21636732702006598393454844519127024459                                                                   |
|    | v78                   | 3                                                                                                        |
|    | v83                   | 20 days                                                                                                  |
|    | v92                   | false                                                                                                    |
|    | v93                   | 1760569131821_1760569326183                                                                              |

| Request        |  | Header                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Query | Body | Cookies | Raw | Summary | + |
|----------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|------|---------|-----|---------|---|
| Key            |  | Value                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |       |      |         |     |         |   |
| _abck          |  | E335130307FCB77B9408BE3A3ECC758A~0~YAAQjqhkaO6euueZ<br>AQAAAvob6g5zFV8nBaN9gUFY8uThFD6DQEkXfOm10eCe9Vq2mA<br>rOpjkPtxMCYgeSY/<br>NPCnxbhaz8925ryNmmJfkWiBLDcqqzs4T5BG7b/<br>4VeJXf1aP7byZsUV1x8GtozWgxCdTq2UINZCW3wo3pYMekieb5M/<br>4auKOoqAiLCSove7G/WJCWCIBNCO2B+/1la91/<br>K5dmT0aY44cXhPK/3Jlz0BP3ILC1EwV7/tHEv1Cdn+G/<br>35NvlxJ2qWO4yUrqnH0jX8iTxAT+xlFAaf0uXTwUyJbT0QYYKZG8<br>gbSfHvyVZSiHF+leWk7jPBVauLpk0lr6MrKNKWJKZ17QBr0VA+jf634<br>UA5TmFduScm3k0u7VuJls2nfcR1JxPQ2HGS1RpjARODO1i0OG8Oa<br>rvRxuLxxupnAdCi2YrQbrrHcgaH2cpPPvLQy668aPLGTJEIfx11tpwB5<br>z88BNWARRGeQRe0ej2gvdrxDvmJXTjXk+US0+SgbiZ9STYFsC7w5<br>yk4isER2ZSpilol9yTjJg2g0Y5Fgp3+pAH2nOKgckqliH/<br>LExlCvliOWYrVmhIX2FiBbGwBDEgfvBbjKR6+0dckYCViG29YpRViYF<br>l6RSydxV2jxFKlcX/oyXUYUOtZi/CtX7pQFCtNmoQ/<br>ztdyV0IUed6rLqNlYAq7Q5uMe/9Mpa++EBrfbHZ9Ln/OJ7Nx1/<br>vq9RA0sfPiHO+CO9xIj00sMAsfIk4JDupNZd9C9ZuQfW6IfZbCyA5U<br>xvPiFdwz/<br>SGZdsqdC26EI3PDTwrNQvE0JI0CpF+j+D2Ws1GMIRxORsJyDVw54<br>wunK6A0KL3io04LmWSksaFEjuQcA1+po86COWonDKJ70D3thXw=~<br>-1~-1~-1~AAQAAAAE%2f%2f%2f%2f%2f1XhAxDV+Ja6+gajKdiLkV<br>vqxKexXVategyIP9WLLvELROUBSx1TXPEwxBeYs834XsAYzVvUzXBu<br>xapTKrMOPljpmka6ORIZvo0AqpnROOHkCgLCkpmpIjYeN1O6pZzavl<br>5fjaY%3d~-1 |       |      |         |     |         |   |
| _fbp           |  | fb.1.1756917607880.570809143800702874.Bg                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |       |      |         |     |         |   |
| _ga            |  | GA1.1.1844917945.1756917608                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |       |      |         |     |         |   |
| _ga_13B5QB73DW |  | GS2.1.s1760569136\$o2\$g0\$t1760569287\$j60\$I0\$h0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |       |      |         |     |         |   |
| _gcl_au        |  | 1.1.1779829067.1756917608                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |       |      |         |     |         |   |
| _uetSID        |  | 87c90a10aa1a11f0a1dd598192c19e76                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |       |      |         |     |         |   |
| _uetvid        |  | ad0f96a0149b11f08bfe7ddd70ea17a1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |       |      |         |     |         |   |

|   |                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---|-----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | ak_bmsc                                       | 03153DD2C88ACA8F9B7D485B5011C1B5~0000000000000000<br>000000000000~YAAQjqhkaM+eueeZAQAATQEZ6h07z+9hAqe6Ju<br>pQJrUgN01MIEWu+wEI22VSuJ/D/<br>507m5YFiiK0w3q4upsRI36XJwFNZd0EZG+AK7Z39ICjPY9VQCWdL<br>NzXwn11faDIKzGhST72TMwtDCMnc5V7UTs8zH9HuXWz/pagZQ7J/<br>YSQ/HnSmkVAs0SE5ryJuY07uQyQ10zIVHGpnuvuf2gLiayFMIzQxD/<br>LAjHP3Dww0SL6UYBbxHofhLq1lz5xzYFXsB4/3jEas5pwxo35rNsheb<br>nW7yVtoH1GhB4l1aws1MmTXEaDTe90jJAG9jPfJ+PK4rxm8mOi5bW<br>JwO3LbT/<br>MIGZJILPFueGQdZbBKTR+BXyFvcFVmWjrDue3NxQXOA8bfxN7E5+<br>4Ssgs=                                                                                                                                  |
| 2 | AKA_A2                                        | A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3 | AMCV_036784BD57A8BB277<br>F000101%40AdobeOrg  | 179643557%7CMCIDTS%7C20377%7CMCMID%7C21636732702<br>006598393454844519127024459%7CMCAAMLH-1761173930%<br>7C9%7CMCAAMB-1761173930%7CRKhpRz8krg2tLO6pguXWp5ol<br>kAcUniQYPHaMWWgdJ3xzPWQmdj0y%7CMCOPTOUT-176057633<br>0s%7CNONE%7CvVersion%7C5.5.0                                                                                                                                                                                                                                                                                                                                                                                                     |
| 4 | AMCVS_036784BD57A8BB27<br>7F000101%40AdobeOrg | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 5 | at_check                                      | true                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 6 | bm_s                                          | YAAQjqhkaO+eueeZAQAAAvob6gTyg4R00gVA+DzjkOsjXTgu+ttMt+x<br>XYnyAK6l1nltjfvWA7pDAYxZ8/86l9dCGUpGNVRYrNcbD4sTqTwhD56<br>UBf+cAsWuU7dOUTrtqJMvRkQvpcKm4iJsUN5EV5hl9RXLUSWCsYd<br>Z5EVbhpNcHCB5qAUwqA9h2/LgTECPA3fXEv35N/<br>sMclhbPchNxcrg9BuMyFPWwmV+AuGCGunBgusGqFQ1lzZDreGZM<br>AeluqRS/hj0FZCNaATXYppqoUtpi8YEcmg7ozhlv+QZIT7us2/<br>VQTOOX5Xf11iC0hjBXWR/oy42K8oRpwTrR7jwBXiwXSrdMG/<br>2z4bJT4BmWx9KoxacD/<br>iWWJ1nVKL8jTmekzudpJdJm6dWqw3xBp3Dwu0y+5MxDnltV9y+ft<br>CN3qqeSAYDj7j2KTJJrX/NxM7QLAk0dW2UulKIKfR4G9XxrvjOgF/<br>xUhJfVjqKfPmrYv/oVTLmt5BGcccdTR5lzRfer/<br>Qp0VWyReGEnic9wsKCKbdU8u0j2uZMi+85Qe9hK7j5MyQ4CeOh0<br>3O9WNGBvBH1zCw== |

bm\_sc

4~1~721888852~YAAQj6hkaCQVV+iZAAAF0Y6gVE/  
 ejQmsNaU2tljQ3Lgi/xQ4f2DwNPAmLiltCJorijsGHIubH8q/  
 PpA8+TJyHrZ+ic2QHUYOpkhkYa+E2wICVox52DmbrEHum2DszifFuPc  
 KuPZa+gUdMiQf2nNZkP4bK4ExkKQMFU9++3TycXsgeH4RSV/  
 EyqDbdluGBv3QDCQSwCjyD6km0YzVPWnSbWvGn1f0tqNsG0Hkm1  
 Si8Fwj68Fzo/  
 aLN+wjzn8sA4i+zjaHQur1OtMD6cSdMObgea04NyUkCNOWvHYzUY  
 /  
 VmCJP+F5FW5tRew+JSTQMNRqVqVjbYm7KkldM0i3FnYtebLYB6T  
 KcOI4jtJiB6JrGvdMWLIBEZ3tlgGU1+/  
 my2XZ9qawhXgMxUjJ0xD7QTU33obYwGwaU6u6qpXTpC2anTVxHt  
 7fEELsngqvcJ3XOH9kXP1bwmcvPIQpsz+j5osfjQ=

bm\_so

6F51DA12EB4316E682E4E61B3AA799BD7F9492E95BEEF5B034D  
 16512A0B40440~YAAQj6hkaA64V+iZAA8PMb6gV0t1UxQ4d2jx  
 zHA+vQ3Fzq+fgvWcfbmoDkqmXDFu8uFS7qi2qOsO9+4YluL8SgG+i  
 vZA4djve50ZP3kArfQRL1EXBpWWIAOy2gUGk7J0sdhcqDkzPuRDn  
 HrJYrhlAQeNg/  
 2sMWjOQU1BhMHZtSptd9HG9cXicMTxgkAQ7xzQfPpdl+KYHy/  
 ro3HS4rnsAOFIBYf3upNhQrihQg5Eq8ymIge3gnixUh88L5+IJ6sjkeFE  
 nttEi5v0GvOuTOZoMjprGKzQkXLDwyk/  
 Hcln7ZS4aD9kZBOra0lZTLtWKnGqa+6lW2vTFWaHS4tZa5xkih4hdie  
 yn94ArwFP/  
 S7lx4MvuX1o2D+rUicEPr9rsXJ3X7BGyXkszzaOMEncodPaGQY8YV  
 7LBG2f5gjXKry2xlT9p4l3jSloePeNH0+q0cfLvZLkmv0QVj4Zg=

bm\_ss

ab8e18ef4e

bm\_sv

82D9DA4C01CBF735D0FDE291D291CCEF~YAAQjqhkaPCeueeZAAQ  
 AAavob6h0OQFy5FnWxXKoE9tXcClToqXOwlS6T7R9vti4ff3O4iNPq  
 PHTZtSe6JPeiEdK8MeYTNJiu8LYtCaH6PEXSdDvRhh4Oo8aScpqDG  
 PEcfkHqryXfYP2wn2WavF3br4cREtTFtPjjtpAqglNNzdTkmVpxkjCQP  
 JnhEihaSnxgC6tBoSufpGOLinus81wJMULEnMnbHwB3FOqGSXJARv  
 1ZnHbVc+I81p0/in/C~1

|                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| bm_sz                  | 9DDDA398DA0998735329BE6D842D7AF1~YAAQjqhkaPGeuueZAAQ<br>AAAvob6h2+19s/JYjvmpkzZ/aLtmMQ3GZ4ny/w/<br>xD287aaT2rjLdSIDIGTrwubVLxxZrGsvEjiLP2dnJdmwVjHPu8FB+Pyol<br>Gth5fHdx+dQq3HFE4fPZB8c6lWXEuaNFOrk9H5FN3tY7ldwHATiHNj<br>FI61KXB6bGtdjhK/<br>OE9G3RkkxEnz0siKIH8VB6j1ldBnzvQcHzAGwaiCuwgPF+qiWiBOY5s<br>0Z5rp71qH6FW3++lfCnBbq716CZkN40Ndy9/<br>u994D1kMyJRwT0xOE5h4ni5mEPcgbyfW1MK5XziUNCwJyJRjlxBqlo<br>xCg/1roClF80/0JU/<br>mJmFHczWUBDthu3mYW5I6Dt42QB14AmfWbFmNfbFmSrvkuU0D<br>KRR7KKCKyxw7K3oQTHj/<br>DQ3X7+WL3yJRgqyw7QWeJjJIN6s=~3616822~3225650 |
| CONSENTMGR             | consent:true%7Cts:1756917607488                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| jedi_loc               | eyJibG9ja2Vkljp0cnVlfQ%3D%3D                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| loc_session            | MTc2MDU2OTEzMTg4MQ%3D%3D                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| mbox                   | PC#e5f3ba4d8f744050947cfedde1ee8b7e.35_0#1823814126 <br>session#f88d697c9aa9489ea8b6d461ed46f131#1760571186                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| mboxEdgeCluster        | 35                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| OptanonConsent         | isGpcEnabled=0&timestamp=2025-10-15T23%3A02%3A05.490Z<br>&version=202508.1.0&browserGpcFlag=0&isIABGlobal=false&hosts<br>=&landingPath=NotLandingPage&groups=C0001%3A1%2CC0004<br>%3A1%2CC0005%3A1%2CC0008%3A1%2CC0009%3A1&consent<br>Id=0cadfaf5-5739-4c24-8c65-6390955b678e&interactionCount=<br>0&isAnonUser=1&AwaitingReconsent=false                                                                                                                                                                                                                 |
| PIM-SESSION-ID         | HPVTtQHqyZvP6foc                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| QuantumMetricSessionID | 7ada5a4711638c9a30e7657bf748ecdf                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| QuantumMetricUserID    | 841292bb1e6c62d17c29253e8d8dd7fe                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| RT                     | "z=1&dm=ups.com&si=118d6d73-97b9-4eff-b30e-<br>ee07a7a3bf31&ss=mgsleiyd&sl=1&tt=24j&bcn=%2F%2F17de4c17<br>.akstat.io%2F"                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| s_cc                   | true                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| s_fid                  | 1E584349F1B95255-3A2C36DF3DB71997                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| s_inv                  | 1731689                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| s_ivc                   | true                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| s_nr30                  | 1760569326190-Repeat                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| s_tslv                  | 1760569326188                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| s_vi                    | [CS]v1 346ADD614A8D6FFA-6000186BC3A25046[CE]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| s_vnc365                | 1792105131921%26vn%3D3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| ups_language_preference | en_US                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| utag_main               | v_id:019910732c3d001efeff67ffbd6c0507500c906d009dc\$_sn:3<br>\$_se:25%3Bexp-session\$_ss:0%3Bexp-<br>session\$_st:1760571126282%3Bexp-<br>session\$ses_id:1760569131821%3Bexp-session\$_pn:2%3Bexp-<br>session\$sr_sample_user:true%3Bexp-<br>session\$vapi_domain:ups.com\$dc_visit:3\$dc_event:9%3Bexp-<br>session\$dc_region:us-west-2%3Bexp-<br>session\$googleSegment:blueConicConnector\$bingSegment:blueCo<br>nicConnector\$qualtricsSegment:NoSegment\$ttd_uuid:8b998e0b-<br>ff4f-4c8c-96a0-353b765c4059%3Bexp-<br>session\$cms_105:1%3Bexp-<br>session\$_prevpageid:tracking%2FtrackWeb%2Ftra(3det).html%3Be<br>xp-1760572926283\$_storepreviouspageids:<br>%3Bexp-1760572926284\$_prevpage:ups%3Aus%3Aen%3Atrack%<br>3Bexp-1760572926283\$googleTags:Y\$timeElapsed_googleAds:32<br>8.20000000298023 |
| X-CSRF-TOKEN            | CfDJ8Jc9GhlwkdBikuRYzfhrpIgL5Aatagh9EH4VvNRXuBGfRYWrlP0<br>Mf4mZxBDTFx_gkeX7Wcib8F4yaHg9GrgwLBmU4gXEKDRS4sh2_M<br>olp0JDp-vKyvYsrJt3XA_LbhlMfY-jCZb7bPqq_tlYKer85U                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| X-XSRF-TOKEN-ST         | CfDJ8Jc9GhlwkdBikuRYzfhrpKramCNaMrg1iu1Vlz_Znn43mZz7Nft<br>PGtSShcWQrgQfT4AwOfFWR1y3-GVUj-<br>eAhP8_Djw_Emcx25tLGE3e-T0r9aJiNvkpsqKQQLHW-<br>scCux4OWk81YiY6yrK-B_rvM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

72. The **mid** parameter corresponds to Adobe's Experience Cloud visitor ID, which Adobe uses to track the user's activities over time. The same is true of the cookies beginning with **AMCV**.

73. The **g** parameter is the URL of the webpage the user was visiting on the UPS website. As shown above, this parameter contains the exact tracking number that the user searched.

74. The **c13** and **v14** parameters also contain the UPS tracking number the user searched.

75. The **s\_vi** cookie is an Adobe Analytics unique visitor ID and timestamp. The **s\_fid** cookie is a fallback unique visitor ID and timestamp.

76. The **mbox** cookie contains a browser identifier and session identifier, which Adobe uses to manage users' experiences in its testing and personalization activities.

1           77. There are also various cookies that correspond to identifiers used by other third  
2 parties. For example, the **QuantumMetricSessionID** and **QuantumMetricUserID** cookies  
3 contain Quantum Metric’s session and user identifiers, respectively. The **utag\_main** cookie  
4 contains Tealium’s visitor identifier (**v\_id**) and session identifier (**ses\_id**). These identifiers  
5 also appear in the request’s parameters: **v206** contains both Quantum Metric identifiers, **v51**  
6 contains the Tealium visitor identifier, and **v50** contains the Tealium session identifier. Thus,  
7 the request transmits identifiers from multiple tracking systems alongside the user’s UPS  
8 tracking number.

9           78. Further, Adobe receives the user-agent header, as well as the user’s IP address.

10           79. As discussed above with respect to Facebook, anyone who obtains a tracking  
11 number can obtain extensive information regarding the recipient and the shipment.  
12 Accordingly, by providing Adobe with the user’s tracking number, Defendants enabled Adobe  
13 to obtain extensive additional information about the user and the shipment.

#### 14           4. Tealium

15           80. Tealium is a customer data platform provider. It tracks users in order to build  
16 profiles of their behavior, group them into audiences, and enable its business customers to  
17 deliver personalized marketing and targeted advertising.

18           81. The UPS website is configured to cause the user’s browser to send data to  
19 Tealium when consumers use the Widget to track their UPS packages.

20           82. The following screenshots show the type of data that Tealium receives at  
21 collect.tealiumiq.com immediately after a consumer presses the Widget’s Track Button:  
22  
23  
24  
25  
26  
27  
28

POST200https://collect.tealiumiq.com/ups/yoda/2/i.gif

Request

Header

Query

Body

Cookies

Multipart

Raw

Summary

+

| Key                      | Value                                                                                                                 |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------|
| :authority               | collect.tealiumiq.com                                                                                                 |
| :method                  | POST                                                                                                                  |
| :path                    | /ups/yoda/2/i.gif                                                                                                     |
| :scheme                  | https                                                                                                                 |
| accept                   | */*                                                                                                                   |
| accept-encoding          | gzip, deflate, br, zstd                                                                                               |
| accept-language          | en-US,en;q=0.9                                                                                                        |
| cache-control            | no-cache                                                                                                              |
| content-length           | 16934                                                                                                                 |
| content-type             | multipart/form-data; boundary=----WebKitFormBoundaryjBjcFqx813orMgAr                                                  |
| cookie                   | tcs.google_gid=eyJJeC9tYWluljoiQ0FFU0VNT20tTIN4M19PWWZ4VUpfNzZSeFp3fDE3NjAzODI1NDMzMzlfQ==;                           |
| origin                   | https://www.ups.com                                                                                                   |
| pragma                   | no-cache                                                                                                              |
| priority                 | u=4, i                                                                                                                |
| sec-ch-ua                | "Google Chrome";v="141", "Not?A_Brand";v="8", "Chromium";v="141"                                                      |
| sec-ch-ua-mobile         | ?0                                                                                                                    |
| sec-ch-ua-platform       | "macOS"                                                                                                               |
| sec-fetch-dest           | empty                                                                                                                 |
| sec-fetch-mode           | no-cors                                                                                                               |
| sec-fetch-site           | cross-site                                                                                                            |
| sec-fetch-storage-access | active                                                                                                                |
| user-agent               | Mozilla/5.0 (Macintosh; Intel Mac OS X 10_15_7) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/141.0.0.0 Safari/537.36 |
| Host                     | collect.tealiumiq.com                                                                                                 |



```

1  {
2    "loader.cfg": {
3      "89": {
4        "load": 1,
5        "send": 1,
6        "v": 202510030613,
7        "wait": 1,
8        "tid": 19063,
9        "consent": 1,
10       "id": "89",
11       "src": "https://tags.tiqcdn.com/utag/ups/nova/prod/utag.89.js?utv=ut4.52.202510030613",
12       "executed": 1
13     },
14     "90": {
15       "load": 1,
16       "send": 1,
17       "v": 202509100131,
18       "wait": 1,
19       "tid": 7132,
20       "consent": 1,
21       "id": "90",
22       "src": "https://tags.tiqcdn.com/utag/ups/nova/prod/utag.90.js?utv=ut4.52.202509100131",
23       "executed": 1
24     },
25     "96": {
26       "load": 1,
27       "send": 1,
28       "v": 202508010315,
29       "wait": 1,
30       "tid": 20110,
31       "consent": 1,
32       "id": "96",
33       "src": "https://tags.tiqcdn.com/utag/ups/nova/prod/utag.96.js?utv=ut4.52.202508010315",
34       "executed": 1
35     },
36     "98": {
37       "load": 1,
38       "send": 1,
39       "v": 202508010315,
40       "wait": 0,
41       "tid": 4041,
42       "consent": 1,
43       "id": "98",
44       "src": "https://tags.tiqcdn.com/utag/ups/nova/prod/utag.98.js?utv=ut4.52.202508010315",
45       "executed": 1
46     }
47   }

```

```

47     "104": {
48         "load": 4,
49         "send": 1,
50         "v": 202508131006,
51         "wait": 0,
52         "tid": 2040,
53         "consent": 1,
54         "id": "104",
55         "executed": 1
56     },
57     "105": {
58         "load": 0,
59         "send": 1,
60         "v": 202508010315,
61         "wait": 1,
62         "tid": 20099,
63         "consent": 1,
64         "id": "105",
65         "executed": 0
66     },
67     "106": {
68         "load": 1,
69         "send": 1,
70         "v": 202509100131,
71         "wait": 1,
72         "tid": 2063,
73         "consent": 1,
74         "id": "106",
75         "src": "https://tags.tiqcdn.com/utag/ups/nova/prod/utag.106.js?utv=ut4.52.202509100131",
76         "executed": 1
77     },
78     "111": {
79         "load": 1,
80         "send": 1,
81         "v": 202509170231,
82         "wait": 1,
83         "tid": 17003,
84         "consent": 1,
85         "id": "111",
86         "src": "https://tags.tiqcdn.com/utag/ups/nova/prod/utag.111.js?utv=ut4.52.202509170231",
87         "executed": 1
88     },

```

```

89     "115": {
90         "load": 1,
91         "send": 1,
92         "v": 202503120647,
93         "wait": 1,
94         "tid": 4049,
95         "consent": 1,
96         "id": "115",
97         "src": "///tags.tiqcdn.com/utag/ups/nova/prod/utag.115.js?utv=ut4.52.202503120647",
98         "executed": 1
99     },
100     "118": {
101         "load": 0,
102         "send": 1,
103         "v": 202410210350,
104         "wait": 1,
105         "tid": 4049,
106         "consent": 1,
107         "id": "118",
108         "executed": 0
109     },
110     "122": {
111         "load": 0,
112         "send": 1,
113         "v": 202410210350,
114         "wait": 1,
115         "tid": 20011,
116         "consent": 1,
117         "id": "122",
118         "executed": 0
119     },
120     "139": {
121         "load": 1,
122         "send": 1,
123         "v": 202506190342,
124         "wait": 1,
125         "tid": 25016,
126         "consent": 1,
127         "id": "139",
128         "src": "///tags.tiqcdn.com/utag/ups/nova/prod/utag.139.js?utv=ut4.52.202506190342",
129         "executed": 1
130     },

```

```

131     "156": {
132         "load": 4,
133         "send": 1,
134         "v": 202502270620,
135         "wait": 0,
136         "tid": 7143,
137         "consent": 1,
138         "id": "156",
139         "executed": 1
140     },
141     "157": {
142         "load": 1,
143         "send": 1,
144         "v": 202503042356,
145         "wait": 1,
146         "tid": 17013,
147         "consent": 1,
148         "id": "157",
149         "src": "///tags.tiqcdn.com/utag/ups/nova/prod/utag.157.js?utv=ut4.52.202503042356",
150         "executed": 1
151     },
152     "218": {
153         "load": 0,
154         "send": 1,
155         "v": 202508131006,
156         "wait": 1,
157         "tid": 4049,
158         "consent": 1,
159         "id": "218",
160         "executed": 0
161     },
162     "219": {
163         "load": 0,
164         "send": 1,
165         "v": 202503120647,
166         "wait": 1,
167         "tid": 4049,
168         "consent": 1,
169         "id": "219",
170         "executed": 0
171     },

```

```

172     "220": {
173         "load": 1,
174         "send": 1,
175         "v": 202508010315,
176         "wait": 1,
177         "tid": 4049,
178         "consent": 1,
179         "id": "220",
180         "src": "//tags.tiqcdn.com/utag/ups/nova/prod/utag.220.js?utv=ut4.52.202508010315",
181         "executed": 1
182     },
183     "221": {
184         "load": 0,
185         "send": 1,
186         "v": 202508010632,
187         "wait": 1,
188         "tid": 4049,
189         "consent": 1,
190         "id": "221",
191         "executed": 0
192     },
193     "228": {
194         "load": 0,
195         "send": 1,
196         "v": 202506190342,
197         "wait": 1,
198         "tid": 20052,
199         "consent": 1,
200         "id": "228",
201         "executed": 0
202     },
203     "232": {
204         "load": 0,
205         "send": 1,
206         "v": 202504101208,
207         "wait": 1,
208         "tid": 7132,
209         "consent": 1,
210         "id": "232",
211         "executed": 0
212     },

```

```

213     "237": {
214         "load": 0,
215         "send": 1,
216         "v": 202504101208,
217         "wait": 1,
218         "tid": 20010,
219         "src": "/assets/resources/webcontent/scripts/mobileapp_adoption_popup_component.js",
220         "consent": 1,
221         "id": "237",
222         "executed": 0
223     },
224     "238": {
225         "load": 0,
226         "send": 1,
227         "v": 202506060309,
228         "wait": 1,
229         "tid": 12054,
230         "consent": 1,
231         "id": "238",
232         "executed": 0
233     },
234     "241": {
235         "load": 1,
236         "send": 1,
237         "v": 202508072318,
238         "wait": 1,
239         "tid": 20010,
240         "src": "/appassets/digital-assistant/scripts/
digitalAssistant.js?utv=ut4.52.202508072318",
241         "block": 1,
242         "id": "241",
243         "cbf": 1,
244         "consent": 1,
245         "executed": 1
246     },
247     "252": {
248         "load": 0,
249         "send": 1,
250         "v": 202508010315,
251         "wait": 1,
252         "tid": 12047,
253         "consent": 1,
254         "id": "252",
255         "executed": 0
256     },

```

```

257     "263": {
258         "load": 0,
259         "send": 1,
260         "v": 202505080353,
261         "wait": 1,
262         "tid": 20052,
263         "consent": 1,
264         "id": "263",
265         "executed": 0
266     },
267     "265": {
268         "load": 0,
269         "send": 0,
270         "v": 202510070405,
271         "wait": 0,
272         "tid": 20060,
273         "src": "https://tags.tiqcdn.com/utag/tiqapp/utag.currency.js",
274         "consent": 1,
275         "id": "265",
276         "executed": 0
277     },
278     "267": {
279         "load": 0,
280         "send": 1,
281         "v": 202505080353,
282         "wait": 1,
283         "tid": 20010,
284         "consent": 1,
285         "id": "267",
286         "executed": 0
287     },
288     "271": {
289         "load": 0,
290         "send": 1,
291         "v": 202506060309,
292         "wait": 1,
293         "tid": 13060,
294         "consent": 1,
295         "id": "271",
296         "executed": 0
297     },

```

```

298     "288": {
299         "load": 1,
300         "send": 1,
301         "v": 202508280257,
302         "wait": 1,
303         "tid": 20064,
304         "consent": 1,
305         "id": "288",
306         "src": "https://tags.tiqcdn.com/utag/ups/nova/prod/utag.288.js?utv=ut4.52.202508280257",
307         "executed": 1
308     },
309     "289": {
310         "load": 1,
311         "send": 1,
312         "v": 202508280443,
313         "wait": 1,
314         "tid": 6037,
315         "consent": 1,
316         "id": "289",
317         "src": "https://tags.tiqcdn.com/utag/ups/nova/prod/utag.289.js?utv=ut4.52.202508280443",
318         "executed": 1
319     },
320     "302": {
321         "load": 0,
322         "send": 1,
323         "v": 202509170231,
324         "wait": 1,
325         "tid": 20067,
326         "consent": 1,
327         "id": "302",
328         "executed": 0
329     }
330 },
331 "data": {
332     "brand_name": "ups.com",
333     "site_indicator": "AEM",
334     "site_area": "simplified_tracking_site_area",
335     "site_sub_area": "simplified_tracking_site_sub_area",
336     "page_id": "tracking/trackWeb/tra(3det).html",
337     "page_language": "en",
338     "page_country_code": "US",
339     "clean_URL": "https://www.ups.com/track",
340     "error_code": "",
341     "page_name": "simplified_tracking_details",
342     "alt_page_id": "track",
343     "page_category": "App",
344     "cms_experiment": ""

```

```

345 "ad_display_list": "",
346 "target_execution_end": 1760569325030,
347 "sync_load_time": null,
348 "cp.utag_main_v_id": "019910732c3d001eff67ffbd6c0507500c906d009dc",
349 "cp.utag_main_sn": "3",
350 "cp.utag_main_se": "19",
351 "cp.utag_main_ss": "0",
352 "cp.utag_main_st": "1760571125545",
353 "cp.utag_main_ses_id": "1760569131821",
354 "cp.utag_main_pn": "2",
355 "cp.utag_main_sr_sample_user": "true",
356 "cp.utag_main_vapi_domain": "ups.com",
357 "cp.utag_main_dc_visit": "3",
358 "cp.utag_main_dc_event": "6",
359 "cp.utag_main_dc_region": "us-west-2",
360 "cp.utag_main_googleSegment": "NoSegment",
361 "cp.utag_main_bingSegment": "NoSegment",
362 "cp.utag_main_qualtricsSegment": "NoSegment",
363 "cp.utag_main_ttd_uuid": "8b998e0b-ff4f-4c8c-96a0-353b765c4059",
364 "cp.utag_main_cms_l05": "1",
365 "cp.utag_main_prevpageid": "tracking/trackWeb/tra(3det).html",
366 "cp.utag_main_prevpage": "ups:us:en:track",
367 "cp.utag_main_googleTimeout": "Y",
368 "cp.utag_main_bingTimeout": "Y",
369 "cp.ups_language_preference": "en_US",
370 "cp.CONSENTMGR": "consent:true|ts:1756917607488",
371 "cp.akacd_Wave1": "2147483647~rv=43~id=286611e3bfd248a62b1ccf5d9467a61",
372 "cp._gcl_au": "1.1.1779829067.1756917608",
373 "cp._fbp": "fb.1.1756917607880.570809143800702874.Bg",
374 "cp.bc_id": "a729ad0b-95fc-4aec-ae7b-b22a1a2ba2b9",
375 "cp._ga": "GA1.1.1844917945.1756917608",
376 "cp.IBM_WAC_ANONYMOUS_USER_ID": "anonymous_IBMuid-106dc4ab-f7ae-4d21-b7d4-3b07e2043be5",
377 "cp.QuantumMetricUserID": "841292bb1e6c62d17c29253e8d8dd7fe",
378 "cp.s_fid": "1E584349F1B95255-3A2C36DF3DB71997",
379 "cp.s_vi": "[CS]v1|346ADD614A8D6FFA-6000186BC3A25046[CE]",
380 "cp.bm_lso": "68118F65365579CA7D4116B550B8DFCD144BD493512B7C17F0AD71B147A415FE~YAAQj6h
EUV+iZAQAAQPgY6gXGswPNAFs31vgjMjoQnKeI29+2PLyGk52RurWwTy4Yo3kjt8smiEiGhy6rP4bu+q0YaG+
nSo7XjbYtchcTGkakG9W6jfRWrVjIxJzp12mKbnNMD2Taq/
4H4Rv9jjnidvj4xxrHw56LoaxZKVqQEWQwSwCSAcPZcL017PghAghKRBP6xwqFxFp0Lnh+bwk/ET6LUi0A1
I4eFH8XQ+bZ6keLu1B1Y4r48Y8rk6v+sd835mK7BJtzhdN3Iyx7CxSwSvinWwYMA2Kj7DpbIIMRGhmRAU+Weue
qGumRxaMCxE6M6BcD1XjvDj6K2PTDCC/x7K2hKRBr+h68m43DMAat03pb7G8td8jJW4qTD7af00VvxZ0/
vvgiH805x50u7jeizET+Bb8Rkm2ShXJK4TH5o/Fwbp2ZMJb5LW8mFJJeJRM=^1760569129662",

```

381 "cp.bm\_sc": "4~1~721888852~YAAQj6hkaCQVV+iZAQAAf0Y6gVE/ejQmsNaU2tLjQ3Lgi/  
382 xQ4f2DwNPAmLiltCJorijSgHiubH8q/PpA8+TJyHrZ+ic2QhYU0pkhYa+E2wICVox52DmbrEHum2DsziFuPck  
383 a+gUdMiQf2nNZkP4bk4ExkkQMFU9++3TycXsgeH4RSV/  
384 EyqDbdLuGBv3QDCQSwCjyD6km0YzVPWnSbWvGn1f0tqNsG0Hkm1S18Fwj68Fzo/  
385 aLN+wjzn8sA4i+zjAHQuR10tMD6cSdM0bgea04NyUkCN0wvHYzUY/VmCJP+F5FW5tRew+JSTQMNRqVqVjbYm7  
386 dM0i3FnYtebLYB6TKC014jtJiB6JrGvdMWLIBEZ3tlgGU1+/my2XZ9qawhXgMxUjJ0xDTQTU33obYwGwaU6u6q  
387 Pc2anTVxHt7FEELSngqvcJ3XOH9kXP1bmvcvPIQps+zj5osfjQ=",  
388 "cp.PIM-SESSION-ID": "HPVTTtQHqZvP6foc",  
389 "cp.AMCVS\_036784BD57A8BB277F000101%40AdobeOrg": "1",  
390 "cp.AMCV\_036784BD57A8BB277F000101%40AdobeOrg": "179643557|MCIDTS|20377|MCID|216367327  
391 06598393454844519127024459|MCAAMLH-1761173930|9|MCAAMB-1761173930|RKhpRz8krg2tL06pguXW  
392 lkAcUniQYPHaMwgdJ3xzPwQmdj0y|MCOPTOUT-1760576330s|NONE|vVersion|5.5.0",  
393 "cp.at\_check": "true",  
394 "cp.OptiononConsent": "isGpcEnabled=0&datestamp=2025-10-15T23:02:05.490Z&version=202508  
395 0&browserGpcFlag=0&isIABGlobal=false&hosts=&landingPath=NotLandingPage&groups=C0001:1,  
396 04:1,C0005:1,C0008:1,C0009:1&consentId=0cadfaf5-5739-4c24-8c65-6390955b678e&interactio  
397 unt=0&isAnonUser=1&AwaitingReconsent=false",  
398 "cp.mboxEdgeCluster": "35",  
399 "cp.loc\_session": "MTc2MDU20TEzMTg4MQ==",  
400 "cp.s\_vnc365": "1792105131921&vn=3",  
401 "cp.s\_ivc": "true",  
402 "cp.s\_inv": "1731689",  
403 "cp.s\_cc": "true",  
404 "cp.bm\_sv": "82D9DA4C01CBF735D0FDE291D291CCEf~YAAQj6hkaDSeueZAQAAxfcb6h1oKxtYU1/1GwH7  
fHLFKSKIWPuIE7iXUJW3RUElBaBgEm07kw+5UPufqiE+cjE82a2iepc4hGouMLAGFGRevhKjHawQc3ftR2jXzS  
AgRDMuBxE4DLFQ4I8ls1wp0wMw2nTJAda7QmTmF0jSJNdqJp1eA3HkbN6Mk1oC/M+PZJpkQZ/  
rsy3isPDOI+Ykb0GjblPg0FTP49P7CVzLVq1m/5aDDDXc8~1",  
"cp.s\_tslv": "1760569132402",  
"cp.BCSessionID": "a729ad0b-95fc-4aec-ae7b-b22a1a2ba2b9",  
"cp.QuantumMetricSessionID": "7ada5a4711638c9a30e7657bf748ecdf",  
"cp.s\_nr30": "1760569133225-Repeat",  
"cp.\_uetid": "87c90a10aa1a11f0a1dd598192c19e76",  
"cp.\_uetvid": "ad0f96a0149b11f08bfe7ddd70ea17a1",  
"cp.jedi\_loc": "eyJibG9ja2VkJp0cnVlfQ==",  
"cp.mbox": "PC#e5f3ba4d8f744050947cfedde1ee8b7e.35\_0#1823813945|session#f88d697c9aa948  
8b6d461ed46f131#1760571186",  
"cp.\_ga\_13B5QB73DW": "GS2.1.s1760569136\$02\$g0\$t1760569287\$j60\$l0\$0",  
"cp.X-XSRF-TOKEN-ST": "CfDJ8Jcj9GhLwkdBikuRYzfhrpKramCNaMrg1iu1VIz\_Znn43mZz7NftPgTSShc  
gQfT4Aw0fFWR1y3-GVUj-eAhP8\_Djw\_Emcx25tLGE3e-T0r9aIJiNvkpsqKGQLHW-scCux40Wk81YiY6yrK-B\_  
",  
"cp.bm\_so": "6F51DA12EB4316E682E4E61B3AA799BD7F9492E95BEEF5B034D16512A0B40440~YAAQj6hk  
4V+iZAQAA8PMb6gV0t1UxQ4d2jxzHA+vQ3Fzq+fgvWcfbmoDkqmXDFu8uF57qi2q0s09+4YlUL8SgG+ivZ4Adj  
0ZP3kArfQRL1EXBpWwLA0y2gUGk7J0sdhcdKzPuRdnHrJYrhlaQeNg/  
2sMwJ0QU1BhMHZtSptd9HG9cXicMTxgkAQ7xzQfPpdl+KYHy/  
ro3HS4rnsA0FLBYf3upNhQrihQg5Eq8ymIge3gnixU88L5+LJ6sjkeFEnttEi5v0Gv0uT0ZomJpRGKzQkXLDw  
HcLn7ZS4aD9kZB0ra0IZTLtWKnGqa+6lW2vTFWahS4tZa5xkih4hdielyn94ArwFP/S7Lx4MvuX1o2D+rUicEPR  
XJ3X7BGyXkszzaOMEncodPaGQY8YV7LBG2f5gjXKry2xLT9p4I3jSIoePeNH0+q0cfLvZLkmv00Vj4Zg=",

405 "cp.bm.sz": "9DDDA398DA0998735329BE6D842D7AF1~YAAQj6hkaA+4V+iZAQAA8PMb6h0EFZjTbVfV3/20  
CQXC0j67k8aDKWbT7Ddxj4esjF50U5UPJ01NJMDjyQ4feMV+ek3mYuiZHEm6srsy6LxsJjfsqNYsb//aenvr8  
TqLSTnsE2Peg7dkoMXDoSfzUEdi8EBzrRNeTpn2pd6Cu9ho/  
1gB91IL0Wdfgogq4VQTLjkgMTJXV6uOvoF3AIBMDkqh5a0MJ0n5t/kxCLyI1ggL0RgEvNl75dRbDX70IyLb1JQ  
s4prdt+n934jU541yScUcZ60zXosUWVXBjWcJGGUzymovp0k43fgirJ0rANo3QDn5YxJkpuN0idBRj0G0D4lam  
B79bjrRmn3CgM8+Z/ZWBsDC/  
uMbefvYxUzzHWRwG1F66fnJsKu0W0WhLs5FrX9am0dW0g6FemM9tDK~3616822~3225650",  
406 "cp.\_abck": "E335130307FCB77B9408BE3A3ECC758A~0~YAAQj6hkaKy4V+iZAQAAovYb6g6mvw0s+oG850  
rVfVXmLTBZJ54206HxvaQmELGaYvNBLnYhc16eWHC0cro+7Sgwi5qRmHqemM7Kfguc6wH71zspjDzDaEAzcha  
jRIMKinXdgK9Qp0gK9guHUAhzlQAR35BtDYzjgwBYHb4076Ztpd3r0Gg1WquLHLEWseqiqCdPQAM0My6woX9kk  
hCJ7/Y415Ki+H5b+hzl+hMjeYiYwAyRaRqmmKRLAoUjvBwKimM0R+H08Xyw8tsQ6w+F320Lb4w0k2RSTGDxk  
hVuoqtBcduki4zwhP3i8Lh4doAfGwYn0lNt1JnLURvNynR8nac3qgZCXSVlm95UA6Tlsrbcg/  
zZzRwMwGqrJe8L1ZxhVU5B0QQujmFSBWP8Y+/h4cbFExbuyxKCoXvgj6/  
HrVdV4RSz+At9T3ZG3TKufJW6YHNCZM2JeCvvBv/UJqAa6Qja7Y5I3mBg+Nj2nfrVhkcD2XALzBkaco3PISUU  
MVG15T483CsHXJ+GtVLCU\Q7reuWwL6nBtM2096Fp5fZ1guj85vB+8DvHi38rpJzB27kBoKbo4ZtMShhx6sC  
U1b5hB6soqNdnJFbaN1C+Cvvd0X1fgW4LxD/8/  
wBsK8zUyvNlBbaAYg1m4XFLTRW8bPvqaxL7zv2zUGM048yTkKvhrPJec98kqcXrF1ct9xbpceAZFACH/tHgeRS  
jxgbGN12PqsbppmFMtB3hvisH2bqCFMnm55mEgkALuVZQafjwwc03h93TjJqXg6fjLC9nSn8YovfiNF3wlvkg  
ejkcqBg2VuIFKjTtE0om/uEMjTB0IP0nCtL3NGQ3rVQ0zzpD4CF5QNU==~1~1~1760572925~AAQAAAAE////  
hAXdV+Ja6+gajKdiLkVvqzKexXVategyIP9WLLveLR0UBSx1TXPEwxBeYs834XsAYzVvUzXBuxapTKrM0PIjpm  
ORLZvo0AqpnR00HkCgLCkppmIjYeN106pZzavl5fjaY=~1",  
407 "cp.RT": "\"z=l&m=ups.com&si=118d6d73-97b9-4eff-b30e-ee07a7a3bf31&ss=mgsleiYd&sl=1&tt  
j&bcn=/17de4c17.akstat.io/\",  
408 "qp.track": "yes",  
409 "qp.trackNums": "1Z0189V40396763440",  
410 "qp.loc": "en\_US",  
411 "qp.requester": "ST%2Ftrackdetails",  
412 "meta.stapp-cap-site-key": "6LeGxsYiAAAAAL05vceT2N-DmLnFQotjbGM27a8Z",  
413 "meta.canonicalurl": "https://www.ups.com/track?loc=\$locale\$",  
414 "meta.keywords": "Track, tracking, track package, live map",  
415 "meta.description": "Track one or multiple packages with UPS Tracking, use your tracki  
number to track the status of your package.",  
416 "meta.footer": "/us/en/fragments/footer",  
417 "meta.nav": "/us/en/fragments/nav",  
418 "meta.ups-locale": "en\_US",  
419 "meta.logoutRedirectURL": "https://www.ups.com/track?loc=en\_US&Requester=lasso",  
420 "meta.loginRedirectURL": "https://www.ups.com/track?loc=en\_US&Requester=lasso",  
421 "meta.env": "01",  
422 "meta.target": "true",  
423 "meta.pageid": "track/simplified-tracking-container.page",  
424 "meta.category": "App",  
425 "meta.app-page": "true",  
426 "meta.country": "us",  
427 "meta.lang": "en",  
428 "meta.app-id": "com-ups-stapp",  
429 "meta.viewport": "width=device-width, initial-scale=1",  
430 "dom.referrer": "",  
431 "dom.title": "Tracking | UPS - United States",  
432 "dom.domain": "www.ups.com",

```

433 "dom.query_string": "track=yes&trackNums=1Z0189V40396763440&loc=en_US&requester=ST/
434 trackdetails",
435 "dom.hash": "",
436 "dom.url": "https://www.ups.com/
437 track?track=yes&trackNums=1Z0189V40396763440&loc=en_US&requester=ST/trackdetails",
438 "dom.pathname": "/track",
439 "dom.viewport_height": 1066,
440 "dom.viewport_width": 792,
441 "ut.domain": "ups.com",
442 "ut.version": "ut4.52.202510070405",
443 "ut.event": "view",
444 "ut.visitor_id": "019910732c3d001efeff67ffbd6c0507500c906d009dc",
445 "tealium_visitor_id": "019910732c3d001efeff67ffbd6c0507500c906d009dc",
446 "ut.session_id": "1760569131821",
447 "ut.account": "ups",
448 "ut.profile": "nova",
449 "ut.env": "prod",
450 "tealium_event": "view",
451 "tealium_session_id": "1760569131821",
452 "tealium_session_number": "3",
453 "tealium_session_event_number": "19",
454 "tealium_datasource": "nx31mn",
455 "tealium_account": "ups",
456 "tealium_profile": "nova",
457 "tealium_environment": "prod",
458 "tealium_random": "1588186890919396",
459 "tealium_library_name": "utag.js",
460 "tealium_library_version": "4.52.0",
461 "tealium_timestamp_epoch": 1760569325,
462 "tealium_timestamp_utc": "2025-10-15T23:02:05.545Z",
463 "tealium_timestamp_local": "2025-10-15T16:02:05.545",
464 "load_target_library": 1760569325106,
465 "link_name": "",
466 "link_page_name": "",
467 "ims_response_time": 375,
468 "encrypted_login_id": "",
469 "user_login_state": "guest",
470 "wem_tdx_existing_account": "false",
471 "wem_tdx_national": "false",
472 "product_affiliation_campusship": "false",
473 "product_affiliation_mychoice": "0",
474 "product_affiliation_quantumview": "false",
475 "product_affiliation_worldship": "false",
476 "product_affiliation_mychoice_basic": "false",
477 "product_affiliation_mychoice_premium": "false",
478 "product_affiliation_mc4buser": "false",
479 "product_affiliation_fgv": "false",
480 "product_affiliation_campusship_admin": "false",

```

```

479     "product_affiliation_billing_center": "false",
480     "product_affiliation_cvadmin": "false",
481     "product_affiliation_cvuser": "false",
482     "product_affiliation_qvd_admin": "false",
483     "product_affiliation_qvm_admin": "false",
484     "preferred_customer": "false",
485     "product_affiliation_accounts": "",
486     "meta.APPVARS.TRK_tracknum": "1z0189v40396763440",
487     "country_language_code": "US-en",
488     "tealium_language_code": "en",
489     "sample_rate": "100",
490     "sample_user": true,
491     "BlueconicScriptURL": "//aap-p.ups.com/script.js",
492     "hasseenrecnotice": false,
493     "hasseenrecnotice_value": false,
494     "isMobileDevice": "false",
495     "cookie_strictly_necessary_OT": "1",
496     "cookie_analytics_OT": "1",
497     "cookie_personalization_OT": "1",
498     "cookie_targeting_OT": "1",
499     "cookie_social_media_OT": "1",
500     "tealium_skip_3rd_party_vid_cookies": "true",
501     "tealium_delete_3rd_party_vid_cookies": "true",
502     "load_tealium_library": 1760569325561,
503     "current_city": "vancouver",
504     "current_region_code": "wa",
505     "current_country_code": "us",
506     "tci.purposes_with_consent_all": [
507         "C0001",
508         "C0004",
509         "C0005",
510         "C0008",
511         "C0009"
512     ],
513     "tci.consent_type": "implicit",
514     "tci.purposes_with_consent_unprocessed": [
515         "C0001",
516         "C0004",
517         "C0005",
518         "C0008",
519         "C0009"
520     ],
521     "tci.purposes_with_consent_processed": [],
522     "previous_page_name": "ups:us:en:track",
523     "previous_page_id": "tracking/trackWeb/tra(3det).html",
524     "tealium_sessionid_with_date": "1760569131821_17605693255647",

```

```

525 "full_url": "https://www.ups.com/
526 track?track=yes&trackNums=1Z0189V40396763440&loc=en_US&requester=ST/trackdetails",
527 "browser_hour": 16,
528 "previous_page_ids": "",
529 "timestamp_in_milliseconds": 1760569325648,
530 "trade_desk_id": "8b998e0b-ff4f-4c8c-96a0-353b765c4059",
531 "marketingCloudVisitorID": "21636732702006598393454844519127024459",
532 "link_name_array": [
533   ""
534 ],
535 "event_date": "2025-10-15T23:02:05Z",
536 "user_agent": "Mozilla/5.0 (Macintosh; Intel Mac OS X 10_15_7) AppleWebKit/537.36 (
KHTML, like Gecko) Chrome/141.0.0.0 Safari/537.36",
537 "current_GPC_consent_state": "GPC: false",
538 "ppwa_consent_state": "PPWA: false",
539 "GPC_PPWA_status": "GPC: false | PPWA: false",
540 "marketo_cookie_id": "935-KKE-240",
541 "tracking_number": "189v4039676344",
542 "bingTag": "",
543 "bingTimeout": "",
544 "adobe_newrepeat": "Repeat",
545 "googleTag": "",
546 "googleTimeout": "",
547 "timing.domain": "www.ups.com",
548 "timing.pathname": "/track",
549 "timing.query_string": "track=yes&trackNums=1Z0189V40396763440&loc=en_US&requester=ST/
trackdetails",
550 "timing.timestamp": 1760569133240,
551 "timing.dns": 0,
552 "timing.connect": 0,
553 "timing.response": 95,
554 "timing.dom_loading_to_interactive": 625,
555 "timing.dom_interactive_to_complete": 262,
556 "timing.load": 1,
557 "timing.time_to_first_byte": 38,
558 "timing.front_end": 890,
559 "timing.fetch_to_response": 38,
560 "timing.fetch_to_complete": 1023,
561 "timing.fetch_to_interactive": 761,
562 "fb_event_id_PageView": "1760569131821_1760569325647",
563 "fb_event_id_PageView_289": "1760569131821_1760569325647"
564 },
565 "browser": {
566   "height": 1066,
567   "width": 792,
568   "screen_height": 1440,
569   "screen_width": 2560,
570   "timezone_offset": 420
571 },
572 "event": "view",
573 "post_time": 1760569325769
574 }

```

83. According to Tealium documentation, the **TAPID** cookie was “designed to facilitate cross-domain identification.”<sup>16</sup> The cookie is designed to enhance the functionality of Tealium’s AudienceStream, which is designed “to create highly granular, persistent unified customer profiles of [website] visitors; enrich these profiles with powerful additive data; and then leverage the data anywhere within [website] marketing technology stack to trigger real-

<sup>16</sup> <https://perma.cc/AA7M-8ZE6> (capture of <https://docs.tealium.com/server-side/visitor-stitching/tapid/> as it appeared on 10/5/2026).

time marketing actions.”<sup>17</sup> Tealium’s documentation states that “AudienceStream always uses the TAPID identifier as the primary identifier if it is present in an incoming request.”<sup>18</sup>

84. The **tealium\_visitor\_id**, **ut.visitor\_id**, and **cp.utag\_main\_v\_id** parameters each contain the same visitor identifier, used to associate a visitor’s activity across events and visits.

85. The **tealium\_session\_id**, **ut.session\_id**, and **cp.utag\_main\_ses\_id** parameters each contain the session identifier, enabling Tealium to associate user activity with the particular visit.

86. The **qp.trackNums** and **meta.APPVARS.TRK\_tracknum** parameters each contain the exact UPS tracking number that the user entered into the Widget.

87. The **dom.url**, **full\_url**, **dom.query\_string**, and **timing.query\_string** parameters also contain the full tracking number, as well as the full or partial URL of the webpage the user is visiting on the UPS website.

88. Further, the data sent to Tealium includes many other third-party identifiers, such as those of Facebook, Google Analytics, Adobe, Quantum Metric, Microsoft, and The Trade Desk.

89. Tealium also receives the user-agent header, as well as the user’s IP address.

90. As discussed above with respect to Facebook, anyone who obtains a tracking number can obtain extensive information regarding the recipient and the shipment.

Accordingly, by providing Tealium with the user’s tracking number, Defendants enabled Tealium to obtain extensive additional information about the user and the shipment.

## 5. Quantum Metric

91. Quantum Metric is a provider of digital analytics and session replay software. It tracks users in order to reconstruct and analyze their interactions with websites and

---

<sup>17</sup> <https://perma.cc/W58R-48B9> (capture of <https://tealium.com/resource/datasheet/tealium-audiencestream/> as it appeared on 10/5/2026).

<sup>18</sup> <https://perma.cc/AA7M-8ZE6> (capture of <https://docs.tealium.com/server-side/visitor-stitching/tapid/> as it appeared on 10/5/2026).

1 applications, identify usability problems, and help its business customers improve user  
2 experiences and increase conversions. Quantum Metric explains that its session replay  
3 technology “allows you to watch an end user’s session as they experienced it, similar to how  
4 you watch a video.”<sup>19</sup> The technology allows one to “pause, rewind, and fast-forward the  
5 session (just like a YouTube video) to watch how a user interacts with a website or mobile  
6 app.”<sup>20</sup>

7 92. The UPS website is configured to cause the user’s browser to send data to  
8 Quantum Metric when consumers use the Widget to track their UPS packages.

9 93. The following screenshots show the type of data that Quantum Metric receives  
10 at ingest.quantummetric.com immediately after a consumer presses the Widget’s Track Button:  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

---

26 <sup>19</sup> See <https://perma.cc/LJH9-Y24W> (capture of [https://www.quantummetric.com/enterprise-](https://www.quantummetric.com/enterprise-guide-to-session-replay)  
27 [guide-to-session-replay](https://www.quantummetric.com/enterprise-guide-to-session-replay) as it appeared on 10/8/2026).

28 <sup>20</sup> *Id.*

| POST               | https:// <a href="https://ingest.quantummetric.com/horizon/ups?T=B&amp;u=https%3A%2F%2Fwww.ups.com%2Ftrack%3Ftrack%3Dyes%26trackNums%3D1Z0189V40396763440%26loc%3Den_US%26requester%3DST%2Ftrackdetails&amp;t=1760569325925&amp;v=1760569326509&amp;s=7ada5a4711638c9a30e7657bf748ecdf&amp;Q=1&amp;Y=1&amp;X=36147af183be486a968758d6b7356c10&amp;S=0&amp;b=126360&amp;z=1">ingest.quantummetric.com/horizon/ups</a> ?T=B&u=https%3A%2F%2Fwww.ups.com%2Ftrack%3Ftrack%3Dyes%26trackNums%3D1Z0189V40396763440%26loc%3Den_US%26requester%3DST%2Ftrackdetails&t=1760569325925&v=1760569326509&s=7ada5a4711638c9a30e7657bf748ecdf&Q=1&Y=1&X=36147af183be486a968758d6b7356c10&S=0&b=126360&z=1 |
|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 200                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Request            | Header Query Body Raw Summary +                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Key                | Value                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| :authority         | ingest.quantummetric.com                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| :method            | POST                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| :path              | /horizon/ups?<br>T=B&u=https%3A%2F%2Fwww.ups.com%2Ftrack%3Ftrack%3Dyes%26trackNums%3D1Z0189V40396763440%26loc%3Den_US%26requester%3DST%2Ftrackdetails&t=1760569325925&v=1760569326509&s=7ada5a4711638c9a30e7657bf748ecdf&Q=1&Y=1&X=36147af183be486a968758d6b7356c10&S=0&b=126360&z=1                                                                                                                                                                                                                                                                                                                                                                                                      |
| :scheme            | https                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| accept             | /*/*                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| accept-encoding    | gzip, deflate, br, zstd                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| accept-language    | en-US,en;q=0.9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| cache-control      | no-cache                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| content-length     | 16784                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| content-type       | text/plain                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Host               | ingest.quantummetric.com                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| origin             | https://www.ups.com                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| pragma             | no-cache                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| priority           | u=1, i                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| sec-ch-ua          | "Google Chrome";v="141", "Not?A_Brand";v="8", "Chromium";v="141"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| sec-ch-ua-mobile   | ?0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| sec-ch-ua-platform | "macOS"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| sec-fetch-dest     | empty                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| sec-fetch-mode     | cors                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| sec-fetch-site     | cross-site                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| user-agent         | Mozilla/5.0 (Macintosh; Intel Mac OS X 10_15_7) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/141.0.0.0 Safari/537.36                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

94. As shown above, the **:path** header and the **u** parameter contain the exact UPS tracking number that the user had entered into the Widget.

95. As discussed above with respect to Facebook, anyone who obtains a tracking number can obtain extensive information regarding the recipient and the shipment.

**E. The Private Communications Collected are Valuable.**

- 65 -

1           97. The Private Communications transmitted to the Third Parties when consumers  
2 use Defendants' Package Tracking System are valuable to Defendants and the Third Parties.  
3 Defendants use this data to measure and optimize marketing campaigns, evaluate website  
4 design and product placement, build user profiles, and target specific users or groups of users  
5 with advertising. For example, Defendants can identify California users who visit webpages  
6 related to particular products, that they may search through Google Search, and then target  
7 those users with advertisements for similar products.

8           98. Data reflecting users' browsing activity allows Defendants to identify  
9 behavioral patterns, preferences, and interests relating to Defendants' products and services,  
10 and those of their Third-Party advertising and marketing partners, among others. At scale, this  
11 data enables Defendants to assess market trends. Defendants monetize this data by leveraging  
12 it to increase user engagement, advertising effectiveness, and overall revenue.

13           99. The value of the Private Communications tracked and collected by the Third  
14 Parties when consumers use Defendants' Package Tracking System can be quantified. Legal  
15 scholars observe that "[p]ersonal information is an important currency in the new  
16 millennium."<sup>21</sup> Indeed, "[t]he monetary value of personal data is large and still growing, and  
17 corporate America is moving quickly to profit from the trend." *Id.* "Companies view this  
18 information as a corporate asset and have invested heavily in software that facilitates the  
19 collection of consumer information." *Id.*

20           100. Numerous empirical studies quantify the appropriate value measure for personal  
21 data. Generally, the value of personal data is measured as either the consumer's willingness to  
22 accept compensation to sell their data or the consumer's willingness to pay to protect their  
23 information.

24           101. By falsely representing consumers' ability to control the use of their data (i.e.,  
25 through Google's representation that "Only your tracking number will be sent to  
26 [UPS/FedEx/USPS]"), and by aiding, agreeing with, employing, permitting, or otherwise

---

27 <sup>21</sup> See Paul M. Schwartz, *Property, Privacy and Personal Data*, 117 Harv. L. Rev. 2055, 2056–  
28 57 (2004).

1 enabling the Third Parties to collect users' Private Communications, Defendants unjustly  
2 enrich themselves at the expense of consumer privacy and autonomy. Defendants deprive  
3 consumers of the ability to decide whether, and on what terms, their data may be monetized.

4 **F. PLAINTIFFS' EXPERIENCES**

5 **1. Plaintiff Lennie Woodley**

6 102. Plaintiff Woodley visited Google Search to seek information about UPS and  
7 FedEx packages for which he had tracking numbers, while located in California, during the  
8 past year.

9 103. Plaintiff Woodley's visits to Google Search were consistent with an ordinary  
10 user's visit seeking information about a package delivery status. Specifically, Plaintiff  
11 Woodley is not a consumer advocate, a "tester," or a compliance auditor who visited Google  
12 Search to test or evaluate Defendants' privacy practices.

13 104. Each time Plaintiff Woodley visited Google Search and provided his tracking  
14 number, it displayed the Widget with his tracking number prepopulated, and with the Track  
15 Button. Plaintiff Woodley viewed Google's representation on the Widget that "Only your  
16 tracking number will be sent to [UPS/FedEx]."

17 105. Plaintiff Woodley clicked or pressed the Track Button. Plaintiff Woodley  
18 believed that selecting the Track Button would result in the disclosure of only the tracking  
19 number he entered to only his selected package carrier. Plaintiff Woodley believed that no  
20 other information besides the tracking number would be sent to the package carrier, and he  
21 believed that no information would be sent to any party other than the package carrier.

22 106. In selecting the Track Button, Plaintiff Woodley gave Defendants notice that he  
23 consented **only** to the disclosure or transmission of the tracking number he entered to the  
24 selected package carrier. Plaintiff Woodley did not consent to the disclosure of additional  
25 information besides the tracking number, nor did Plaintiff Woodley consent to the disclosure of  
26 any information to parties other than the package carrier. In seeing and relying on the "Only  
27  
28

1 your tracking number will be sent to [UPS/FedEx]” representation, only then did Plaintiff  
2 Woodley click the Track Button.

3 107. Despite the representation in the Widget, Defendants nonetheless caused Private  
4 Communications other than the tracking number to be disclosed or transmitted to the package  
5 carrier, and Defendants also caused a variety of information to be disclosed or transmitted to  
6 parties other than the package carrier, including the Third Parties, all of which occurred  
7 without Plaintiff Woodley’s knowledge. Accordingly, the Widget’s representation to Plaintiff  
8 Woodley that he could receive package tracking information without disclosing anything other  
9 than the package tracking number directly to the carrier and only the carrier was false.

10 Contrary to what Defendants caused Plaintiff Woodley to believe, he did not have a choice  
11 about whether information other than the tracking number would be transmitted to the carrier  
12 and whether other information would be transmitted to the Third Parties; rather, Defendants  
13 caused that to happen without Plaintiff Woodley’s knowledge or consent. In doing so,  
14 Defendants permitted the Third Parties to track and collect Plaintiff Woodley’s Private  
15 Communications.

16 108. Defendants’ representation that use of the Widget would entail only the  
17 disclosure of a tracking number directly to the carrier was untrue. Had Plaintiff Woodley  
18 known this fact, he would not have used the Package Tracking System. Had Defendants  
19 disclosed that using the Package Tracking System would cause the transmission of information  
20 other than the package tracking number, or that it would cause the transmission of information  
21 to parties other than the package carrier, Plaintiff Woodley would have noticed it and would  
22 not have used the Package Tracking System.

23 109. Plaintiff Woodley continues to desire to use Google Search to track his  
24 packages. If Defendants’ Package Tracking System were configured to honor Defendants’  
25 promise that “Only your tracking number will be sent to [the carrier],” Plaintiff Woodley  
26 would likely use the system in the future, but will not do so until then. Because Plaintiff  
27 Woodley does not know how the Package Tracking System is programmed, which can change  
28

over time, and because he does not have the technical knowledge necessary to test whether it is configured to honor Defendants’ promise that “[o]nly your tracking number will be sent to [the carrier],” Plaintiff Woodley will be unable to rely on Defendants’ representations when using the system in the future absent an injunction that prohibits Defendants from making such misrepresentations. The only way to determine what network traffic is sent to third parties when using the Package Tracking System is to use a specialized tool such as Chrome Developer Tools. As the name suggests, such tools are designed for use by “developers” (i.e., software developers), whose specialized training enables them to analyze the data underlying the HTTP traffic to determine what data, if any, is being sent to whom. Plaintiff Woodley is not a software developer and has not received training with respect to HTTP network calls.

## **2. Plaintiff Joseph S. Schrant**

110. Plaintiff Schrant visited Google Search to seek information about UPS, FedEx, and USPS packages for which he had tracking numbers, while located in California, during the past year.

111. Plaintiff Schrant’s visits to Google Search were consistent with an ordinary user’s visit seeking information about a package delivery status. Specifically, Plaintiff Schrant is not a consumer advocate, a “tester,” or a compliance auditor who visited Google Search to test or evaluate Defendants’ privacy practices.

112. Each time Plaintiff Schrant visited Google Search and provided his tracking number, it displayed the Widget with his tracking number prepopulated, and with the Track Button. Plaintiff Schrant viewed Google’s representation on the Widget that “Only your tracking number will be sent to [UPS/FedEx/USPS].”

113. Plaintiff Schrant clicked or pressed the Track Button. Plaintiff Schrant believed that selecting the Track Button would result in the disclosure of only the tracking number he entered to only his selected package carrier. Plaintiff Schrant believed that no other Private Communications besides the tracking number would be sent to the package carrier, and he believed that no information would be sent to any party other than the package carrier.

1           114. In selecting the Track Button, Plaintiff Schrant gave Defendants notice that he  
2 consented *only* to the disclosure or transmission of the tracking number he entered to the  
3 selected package carrier. Plaintiff Schrant did not consent to the disclosure of additional  
4 information besides the tracking number, nor did Plaintiff Schrant consent to the disclosure of  
5 any information to parties other than the package carrier. In seeing and relying on the “Only  
6 your tracking number will be sent to [UPS/FedEx/USPS]” representation, only then did  
7 Plaintiff Schrant click the Track Button.

8           115. Despite the representation in their Package Tracking System, Defendants  
9 nonetheless caused information other than the tracking number to be disclosed or transmitted  
10 to the package carrier, and Defendants also caused a variety of information to be disclosed or  
11 transmitted to parties other than the package carrier, including the Third Parties, all of which  
12 occurred without Plaintiff Schrant’s knowledge. Accordingly, the Widget’s representation to  
13 Plaintiff Schrant that he could receive package tracking information without disclosing  
14 anything other than the package tracking number directly to the carrier and only the carrier was  
15 false. Contrary to what Defendants caused Plaintiff Schrant to believe, he did not have a choice  
16 about whether information other than the tracking number would be transmitted to the carrier  
17 and whether other information would be transmitted to the Third Parties; rather, Defendants  
18 caused that to happen without Plaintiff Schrant’s knowledge or consent. In doing so,  
19 Defendants permitted the Third Parties to track and collect Plaintiff Schrant’s Private  
20 Communications.

21           116. Defendants’ representation that use of the Widget would entail only the  
22 disclosure of a tracking number directly to the carrier was untrue. Had Plaintiff Schrant known  
23 this fact, he would not have used the Package Tracking System. Had Defendants disclosed that  
24 using the Package Tracking System would cause the transmission of information other than the  
25 package tracking number, or that it would cause the transmission of information to parties  
26 other than the package carrier, Plaintiff Schrant would have noticed it and would not have used  
27 the Package Tracking System.  
28

117. Plaintiff Schrant continues to desire to use Google Search to track his packages. If Defendants' Package Tracking System were configured to honor Defendants' promise that "Only your tracking number will be sent to [the carrier]," Plaintiff Schrant would likely use the system in the future, but will not do so until then. Because Plaintiff Schrant does not know how the Package Tracking System is programmed, which can change over time, and because he does not have the technical knowledge necessary to test whether it is configured to honor Defendants' promise that "[o]nly your tracking number will be sent to [the carrier]," Plaintiff Schrant will be unable to rely on Defendants' representations when using the system in the future absent an injunction that prohibits Defendants from making such misrepresentations. The only way to determine what network traffic is sent to third parties when using the Package Tracking System is to use a specialized tool such as Chrome Developer Tools. As the name suggests, such tools are designed for use by "developers" (i.e., software developers), whose specialized training enables them to analyze the data underlying the HTTP traffic to determine what data, if any, is being sent to whom. Plaintiff Schrant is not a software developer and has not received training with respect to HTTP network calls.

### **CLASS ALLEGATIONS**

118. Plaintiffs bring this Class Action Complaint on behalf of themselves and the following proposed class and subclass comprised of similarly situated persons, pursuant to Rules 23(b)(2) and (b)(3) of the Federal Rules of Civil Procedure. Plaintiffs seek to represent the following groups of similarly situated persons, defined as follows:

**Class:** All persons who used the "Track your package" Widget on Google Search, in the United States, and clicked or pressed the Track Button.

**California Subclass:** All Class members who used the "Track your package" Widget on Google Search, while located in the State of California, and clicked or pressed the Track Button.

1           119. This action has been brought and may properly be maintained as a class action  
2 against Defendants because there is a well-defined community of interest in the litigation and  
3 the proposed class and subclass are easily ascertainable.

4           120. **Numerosity:** Plaintiffs do not know the exact size of the Class or Subclass, but  
5 they estimate that they are composed of more than 100 persons. The persons in the Class and  
6 Subclass are so numerous that the joinder of all such persons is impracticable and the  
7 disposition of their claims in a class action rather than in individual actions will benefit the  
8 parties and the courts.

9           121. **Common Questions Predominate:** This action involves common questions of  
10 law and fact to the Class and Subclass because each class member's claim derives from the  
11 same unlawful conduct that led them to believe that Defendants would not cause the  
12 transmission (or disclosure) of any information other than the package tracking number and  
13 that Defendants would not cause the transmission (or disclosure) of any information to any  
14 party other than the package carrier, after Class and Subclass members chose to click or select  
15 the Track Button, nor would Defendants permit third parties to track and collect Class  
16 members' Private Communications.

17           122. The common questions of law and fact predominate over individual questions,  
18 as proof of a common or single set of facts will establish the right of each member of the Class  
19 and Subclass to recover. The questions of law and fact common to the Class and Subclass are:

- 20           a. Whether Defendants' actions violate the laws invoked herein; and  
21           b. Whether Plaintiffs and Class members are entitled to damages, restitution,  
22           injunctive and other equitable relief, reasonable attorneys' fees, prejudgment interest  
23           and costs of this suit.

24           123. **Typicality:** Plaintiffs' claims are typical of the claims of the other members of  
25 the Class and Subclass because, among other things, Plaintiffs, like the other Class members,  
26 visited Google Search, clicked or pressed the Track Button, and had their confidential Private  
27 Communications intercepted by the Third Parties.

1           124.   **Adequacy of Representation:** Plaintiffs will fairly and adequately protect the  
2 interests of all Class and Subclass members because it is in their best interests to prosecute the  
3 claims alleged herein to obtain full compensation due to them for the unfair and illegal conduct  
4 of which they complain. Plaintiffs also have no interests in conflict with, or antagonistic to, the  
5 interests of Class and Subclass members. Plaintiffs have retained highly competent and  
6 experienced class action attorneys to represent their interests and those of the Class and  
7 Subclass. By prevailing on their claims, Plaintiffs will establish Defendants' liability to all  
8 Class and Subclass members. Plaintiffs and their counsel have the necessary financial  
9 resources to adequately and vigorously litigate this class action, and Plaintiffs and counsel are  
10 aware of their fiduciary responsibilities to the Class and Subclass members and are determined  
11 to diligently discharge those duties by vigorously seeking the maximum possible recovery for  
12 Class and Subclass members.

13           125.   **Superiority:** There is no plain, speedy, or adequate remedy other than by  
14 maintenance of this class action. The prosecution of individual remedies by members of the  
15 Class and Subclass will tend to establish inconsistent standards of conduct for Defendants and  
16 result in the impairment of Class members' rights and the disposition of their interests through  
17 actions to which they were not parties. Class action treatment will permit a large number of  
18 similarly situated persons to prosecute their common claims in a single forum simultaneously,  
19 efficiently, and without the unnecessary duplication of effort and expense that numerous  
20 individual actions would engender. Furthermore, as the damages suffered by each individual  
21 member of the Class and Subclass may be relatively small, the expenses and burden of  
22 individual litigation would make it difficult or impossible for individual members of the Class  
23 and Subclass to redress the wrongs done to them, while an important public interest will be  
24 served by addressing the matter as a class action. Plaintiffs are unaware of any difficulties that  
25 are likely to be encountered in the management of this action that would preclude its  
26 maintenance as a class action.  
27  
28

1 **CAUSES OF ACTION**

2 **First Cause of Action: Invasion of Privacy**  
3 **(On Behalf of the Class)**

4 126. Plaintiffs reallege and incorporate the preceding paragraphs of this Complaint as  
5 if set forth herein.

6 127. To plead an invasion of privacy claim, Plaintiffs must show (i) a legally  
7 protected privacy interest; (ii) that Plaintiffs had a reasonable expectation of privacy in the  
8 circumstances; and (iii) conduct by Defendants constituting a serious invasion of privacy.

9 128. Defendants have intruded upon legally protected privacy interests of Plaintiffs  
10 and Class members in their Private Communications and in controlling the dissemination and  
11 use of those communications. These interests are protected by (i) the California Invasion of  
12 Privacy Act (“CIPA”), as alleged herein; (ii) article I, section 1 of the California Constitution,  
13 which guarantees Californians the right to privacy; (iii) the California Wiretap Acts as alleged  
14 herein; (iv) Cal. Penal Code § 484(a), which prohibits the knowing theft or defrauding of  
15 property “by any false or fraudulent representation or pretense”; and (v) Plaintiffs’ and Class  
16 members’ Fourth Amendment right to privacy.

17 129. Plaintiffs and Class members had a reasonable expectation of privacy under the  
18 circumstances, as Defendants affirmatively promised that “Only your tracking number will be  
19 sent to [UPS/FedEx/USPS]” if Plaintiffs and Class members used the Widget on Google  
20 Search after inputting a package tracking number. Plaintiffs and Class members reasonably  
21 expected that Defendants would honor their “Only your tracking number will be sent to  
22 [UPS/FedEx/USPS]” representation if they clicked or pressed the Track Button. That is, they  
23 reasonably believed that Defendants would not permit the package carrier to receive or collect  
24 information other than the tracking number, nor would Defendants permit the Third Parties to  
25 receive or collect any information, or use third-party resources to collect such information.  
26 Plaintiffs and Class members also reasonably expected that, if they clicked or pressed the  
27 Track Button, Defendants would not permit the Third Parties to track and collect Plaintiffs’  
28 and Class members’ Private Communications, including their browsing history, visit history,

1 website interactions, user input data, demographic information, interests and preferences,  
2 shopping behaviors, device information, referring URLs, session information, user identifiers,  
3 and/or geolocation data, on the carriers' websites.

4 130. Such information is "personal information" under California law, which defines  
5 personal information as including "Internet or other electronic network activity information,"  
6 such as "browsing history, search history, and information regarding a consumer's interaction  
7 with an internet website, application, or advertisement." Cal. Civ. Code § 1798.140.

8 131. Defendants, in violation of Plaintiffs' and other Class members' reasonable  
9 expectation of privacy and without their consent, cause information to be transmitted or  
10 disclosed to the Third Parties, and permit the Third Parties to use third-party resources to  
11 collect, track, and compile users' Private Communications, including their browsing history,  
12 visit history, website interactions, user input data, demographic information, interests and  
13 preferences, shopping behaviors, device information, referring URLs, session information, user  
14 identifiers, and/or geolocation data—including whether a user is located in California. The data  
15 that Defendants allowed the Third Parties to collect enables the Third Parties to (and they in  
16 fact do), *inter alia*, create consumer profiles containing detailed information about a  
17 consumer's behavior, preferences, and demographics; create audience segments based on  
18 shared traits (such as Millennials, Californians, tech enthusiasts, etc.); and perform targeted  
19 advertising and marketing analytics. Further, the Third Parties share user data and/or the user  
20 profiles with unknown parties to further their financial gain. The consumer profiles are and can  
21 be used to further invade Plaintiffs' and users' privacy, by allowing Third Parties to learn  
22 intimate details of their lives, and target them for advertising and other purposes, as described  
23 herein, thereby harming them through the abrogation of their autonomy and their ability to  
24 control dissemination and use of information about them.

25 132. Defendants collaboratively developed, tested, and maintained the Package  
26 Tracking System that violated Plaintiffs' and other Class members' expectation of privacy.  
27 Google developed the Widget, including the "Only your tracking number..." representation.  
28

Google's software code ensured that when a user clicked the Widget's Track Button, data other than the tracking number would be sent to UPS, including the user's IP address, a significant number of cookies, the referrer header, the user-agent header, and various other headers disclosing the user's device, operating system, and browser. UPS developed its package tracking API and integrated it with the Widget. UPS further installed Third Party tracking code on its website and configured it such that when a consumer clicked the Widget's Track Button, the consumer's browser would load and execute that tracking code, causing extensive tracking information (including the Private Communications such as Plaintiffs' and other Class members' package tracking numbers) to be sent to Third Parties, including Google's Analytics and DoubleClick platforms. Google LLC reviewed, tested, and approved UPS's integration even though that integration violated the "Only your tracking number..." representation.

133. Defendants' actions constituted a serious invasion of a recognized zone of privacy (i.e., one's personal communications) and caused Plaintiffs' and Class members' tracking numbers and associated user identifiers to be disclosed to the Third Parties for tracking and profiling across websites and time despite the express promise that only their tracking number would be sent to the selected carrier. Defendants' actions also violated criminal laws on wiretapping and invasion of privacy. These acts constitute an egregious breach of social norms that is highly offensive.

134. Defendants' intrusion into Plaintiffs' privacy was also highly offensive to a reasonable person.

135. Defendants lacked a legitimate business interest sufficient to justify allowing the Third Parties to track, intercept, receive, and collect Private Communications, including their browsing history, visit history, website interactions, user input data, demographic information, interests and preferences, shopping behaviors, device information, referring URLs, session information, user identifiers, and/or geolocation data, without user consent, and after expressly informing users that "Only your tracking number will be sent to [UPS/FedEx/USPS][.]"

1           136. Plaintiffs and Class members have been damaged by Defendants’ invasion of  
2 their privacy and are entitled to just compensation, including monetary damages.

3           137. Plaintiffs and Class members seek appropriate relief for that injury, including  
4 but not limited to damages that will compensate them for the harm to their privacy interests as  
5 well as disgorgement of profits made by Defendants as a result of their intrusions upon  
6 Plaintiffs’ and Class members’ privacy.

7           138. Plaintiffs and Class members seek punitive damages because Defendants’  
8 actions—which were malicious, oppressive, and willful—were undertaken in conscious  
9 disregard of Plaintiffs’ and Class members’ rights and Plaintiffs’ and Class members’ express  
10 consent to the disclosure of “Only [their] tracking number...” when they used the Widget.  
11 Punitive damages are warranted to deter Defendants from engaging in future misconduct.

12                           **Second Cause of Action: Intrusion Upon Seclusion**  
13                           **(On Behalf of the Class)**

14           139. Plaintiffs reallege and incorporate by reference all preceding paragraphs alleged  
15 herein.

16           140. To assert a claim for intrusion upon seclusion, Plaintiffs must plead (i) that  
17 Defendants intentionally intruded into a place, conversation, or matter as to which Plaintiffs  
18 had a reasonable expectation of privacy; and (ii) that the intrusion was highly offensive to a  
19 reasonable person.

20           141. Defendants caused users’ browsers to transmit Plaintiffs’ and Class members’  
21 Private Communications (including their package tracking numbers, browsing history, visit  
22 history, website interactions, user input data, demographic information, interests and  
23 preferences, shopping behaviors, device information, referring URLs, session information, user  
24 identifiers, and/or geolocation data) to Third Parties, enabling those Third Parties to access,  
25 track, and collect those Private Communications, and effectively placing the Third Parties in  
26 the middle of communications to which they were not invited, welcomed, or authorized.  
27 Defendants did all of this without the knowledge or consent of Plaintiffs and Class members,  
28 and in contravention of the “Only your tracking number...” representation. In doing so,

1 Defendants intentionally intruded upon the solitude or seclusion of Plaintiffs and Class  
2 members.

3 142. The Third Parties' tracking and collecting of Plaintiffs' and Class members'  
4 Private Communications on the carriers' websites using third-party resources that Defendants  
5 caused to be stored on users' devices—and used to transmit those Private Communications to  
6 the Third Parties—was not authorized by Plaintiffs and Class members, and, in fact, Plaintiffs  
7 and Class members relied on Defendants' representation and promise that “Only your tracking  
8 number will be sent to [UPS/FedEx/USPS].”

9 143. Plaintiffs and the Class members had an objectively reasonable expectation of  
10 privacy surrounding their Private Communications on the carriers' websites based on  
11 Defendants' promise that “Only your tracking number will be sent to [UPS/FedEx/USPS],” as  
12 well as state criminal and civil laws designed to protect individual privacy.

13 144. Defendants' intentional intrusion into Plaintiffs' and other users' Private  
14 Communications would be highly offensive to a reasonable person given that Defendants  
15 represented, “Only your tracking number will be sent to [UPS/FedEx/USPS],” when users  
16 clicked or pressed the Track Button, when, in fact, Defendants caused users' browsers to  
17 transmit or disclose information other than the tracking number to the carrier, and Defendants  
18 caused information to be transmitted to the Third Parties by way of third-party resources.  
19 Indeed, Plaintiffs and Class members reasonably expected, based on Defendants' false  
20 representation, that when they clicked or pressed the Track Button, Defendants would not  
21 transmit or disclose more information than had been promised, nor permit the Third Parties to  
22 obtain their Private Communications on the carriers' websites, including their browsing  
23 history, visit history, website interactions, user input data, demographic information, interests  
24 and preferences, shopping behaviors, device information, referring URLs, session information,  
25 user identifiers, and/or geolocation data—including whether a user is located in California.  
26 These practices linked Plaintiffs' and Class members' package tracking numbers with  
27  
28

1 persistent user identifiers and enabled tracking and profiling across websites and time, despite  
2 the express assurance limiting disclosure.

3 145. Defendants' conduct was intentional and intruded on Plaintiffs' and users'  
4 Private Communications on the carriers' websites.

5 146. Plaintiffs and Class members have been damaged by Defendants' invasion of  
6 their privacy and are entitled to just compensation, including monetary damages. Each  
7 Defendants' conduct was a substantial factor in causing the unauthorized collection of  
8 Plaintiffs' and Class members' Private Communications and their resulting loss of control over  
9 the dissemination and use of that information.

10 147. Plaintiffs and Class members seek appropriate relief for that injury, including  
11 but not limited to damages that will compensate them for the harm to their privacy interests as  
12 well as disgorgement of profits made by Defendants as a result of their intrusions upon  
13 Plaintiffs' and Class members' privacy.

14 148. Plaintiffs and Class members seek punitive damages because Defendants'  
15 actions—which were malicious, oppressive, and willful—were undertaken in conscious  
16 disregard of Plaintiffs' and Class members' rights and Plaintiffs' and Class members' choice to  
17 use the Widget in the understanding that “Only your tracking number will be sent to  
18 [UPS/FedEx/USPS]” upon clicking or selecting the Track Button. Punitive damages are  
19 warranted to deter Defendants from engaging in future misconduct.

20 **Third Cause of Action: Wiretapping in Violation of the California Invasion of Privacy**  
21 **Act (California Penal Code § 631)**  
22 **(On Behalf of the Subclass)**

23 149. Plaintiffs reallege and incorporate by reference all preceding paragraphs alleged  
24 herein.

25 150. California Penal Code § 631(a) provides, in pertinent part:

26 “Any person [i] who, by means of any machine, instrument, or contrivance, or in  
27 any other manner . . . willfully and without the consent of all parties to the  
28 communication, or [ii] [who] in any unauthorized manner, reads, or attempts to  
read, or to learn the contents or meaning of any message, report, or  
communication while the same is in transit or passing over any wire, line, or

1 cable, or is being sent from, or received at any place within this state; or [iii] who  
2 uses, or attempts to use, in any manner, or for any purpose, or to communicate in  
3 any way, any information so obtained, or [iv] who aids, agrees with, employs, or  
conspires with any person or persons to unlawfully do, or permit, or cause to be  
done any of the acts or things mentioned above in this section, is punishable by a  
fine not exceeding two thousand five hundred dollars . . . .”

4 151. Each Defendant is a “person” within the meaning of California Penal Code  
5 § 631.

6 152. The third-party resources in use on the carriers’ websites—as well as the  
7 software code responsible for transmitting or disclosing information to the Third Parties and  
8 others when users click or select the Track Button—constitute “machine[s], instrument[s], or  
9 contrivance[s]” under the CIPA (and, even if they do not, Defendants’ deliberate and  
10 purposeful scheme that facilitated the interceptions falls under the broad statutory catch-all  
11 category of “any other manner”).

12 153. The Third Parties act as outside recipients of users’ communications with the  
13 carriers and are not merely passive recording devices. Further, the Third Parties had the  
14 capability to use the wiretapped information for their own purposes and, as alleged above, they  
15 did in fact use the wiretapped information for their own business purposes. Accordingly, the  
16 Third Parties were third parties to the intercepted communications between Plaintiffs and  
17 Subclass members, on the one hand, and the carriers, on the other.

18 154. Under § 631(a), Defendants must show they had the prior consent of all parties  
19 to a communication.

20 155. At all relevant times, Defendants caused the unauthorized transmittal or  
21 disclosure of Plaintiffs’ and Subclass members’ Private Communications—including their  
22 package tracking numbers, browsing history, visit history, website interactions, user input data,  
23 demographic information, interests and preferences, shopping behaviors, device information,  
24 referring URLs, session information, user identifiers, and/or geolocation data—to the Third  
25 Parties without Plaintiffs’ and Subclass members’ consent. Further, the Package Tracking  
26 System also caused the unauthorized transmittal or disclosure of additional information besides  
27 the tracking number to the package carrier. By their respective conduct in developing,  
28

1 integrating, testing, approving, and maintaining the Package Tracking System, Defendants  
2 willfully and knowingly aided, agreed with, employed, permitted, or otherwise caused the  
3 Third Parties to wiretap Plaintiffs and Subclass members using the Third Parties' resources  
4 (including the software code described above) and to accomplish the wrongful conduct alleged  
5 herein. Each Defendant knew that the Package Tracking System would cause the Third Parties  
6 to acquire the content of users' communications with the carriers without users' consent.

7 156. At all relevant times, by their resources and corresponding software code, the  
8 Third Parties—including Google through its Analytics and DoubleClick platforms with respect  
9 to communications with UPS—willfully and without the consent of all parties to the  
10 communication, or in any unauthorized manner, read, attempted to read, and/or learned the  
11 contents or meaning of electronic communications of Plaintiffs and Subclass members, on the  
12 one hand, and the carriers, on the other, while the electronic communications were in transit or  
13 were being sent from or received at any place within California. For example, code on UPS's  
14 website caused users' browsers to record their interactions with UPS's website and transmit the  
15 recordings to Quantum Metric in real time.

16 157. The Private Communications between the Plaintiffs and Subclass members, on  
17 the one hand, and the carriers, on the other, that the Third Parties automatically intercepted  
18 included package tracking requests that directly reveal users' affirmative decisions, actions,  
19 choices, preferences, and activities and constitute the "contents" of electronic communications.  
20 In particular, the package tracking numbers identifying the particular packages for which  
21 Plaintiffs and Subclass members requested delivery information were intercepted by the Third  
22 Parties. In addition, the Third Parties collected associated information, including Plaintiffs' and  
23 Subclass members' browsing history, visit history, website interactions, user input data,  
24 demographic information, interests and preferences, shopping behaviors, device information,  
25 referring URLs, session information, user identifiers, and/or geolocation data.

1           158. At all relevant times, the Third Parties used or attempted to use the Private  
2 Communications automatically intercepted by their tracking technologies described above for  
3 their own purposes.

4           159. Plaintiffs and Subclass members did not provide their prior consent to the Third  
5 Parties' intentional access, interception, reading, learning, recording, collection, and use of  
6 Plaintiffs' and Subclass members' electronic communications. Nor did Plaintiffs and Subclass  
7 members provide their prior consent to Defendants aiding, agreeing with, employing,  
8 permitting, or otherwise enabling the Third Parties' conduct. On the contrary, Plaintiffs and  
9 Subclass members did not consent to the access, interception, reading, learning, recording,  
10 collection, and use of Plaintiffs' and Subclass members' electronic communications, except to  
11 the transmission of their package tracking number to their selected carrier to obtain package  
12 tracking information.

13           160. The wiretapping of Plaintiffs and Subclass members occurred in California,  
14 where Plaintiffs and Subclass members accessed the Package Tracking System and where the  
15 Third Parties—as caused by Defendants—routed Plaintiffs' and Subclass members' electronic  
16 communications to the Third Parties' servers. Among other things, the third-party resources, as  
17 well as the software code responsible for placing those resources and transmitting Private  
18 Communications to the Third Parties, resided on Plaintiffs' California-located devices. In  
19 particular, the user's California-based device, after downloading the software code from the  
20 Third Parties' servers, executed the code, causing the transmission of data (including the  
21 tracking number itself) to and from the Third Parties.

22           161. Plaintiffs and Subclass members have suffered loss by reason of these  
23 violations, including, but not limited to, (i) violation of their right to privacy, (ii) loss of value  
24 in their Private Communications, (iii) damage to and loss of Plaintiffs' and Subclass members'  
25 property right to control the dissemination and use of their Private Communications, and  
26 (iv) loss of their Private Communications to the Third Parties with no consent.  
27  
28

1           162. Pursuant to California Penal Code § 637.2, Plaintiffs and Subclass members  
 2 have been injured by the violations of California Penal Code § 631, and each seeks statutory  
 3 damages of the greater of \$5,000, or three times the amount of actual damages, for each of  
 4 Defendants' violations of CIPA § 631(a), as well as injunctive relief.

5           163. Unless enjoined, Defendants will continue to commit the illegal acts alleged  
 6 herein including, but not limited to, permitting Third Parties and others to access, intercept,  
 7 read, learn, record, collect, and use Plaintiffs' and Subclass members' electronic Private  
 8 Communications with the carriers. Plaintiffs, Subclass members, and the general public  
 9 continue to be at risk because Plaintiffs, Subclass members, and the general public frequently  
 10 use the internet to search for package delivery statuses and tracking information. Plaintiffs,  
 11 Subclass members, and the general public continue to desire to use the internet for that  
 12 purpose. Plaintiffs, Subclass members, and the general public have no practical way to know if  
 13 their choice to send "Only [the] tracking number" to the selected carrier while using the  
 14 Widget will be honored and/or whether Defendants will permit Third Parties to access,  
 15 intercept, read, learn, record, collect, and use Plaintiffs' and Subclass members' electronic  
 16 Private Communications with the carriers. Further, Defendants have already permitted the  
 17 Third Parties to access, intercept, read, learn, record, collect, and use Plaintiffs' and Subclass  
 18 members' electronic Private Communications with the carriers and will continue to do so  
 19 unless and until enjoined.

20           **Fourth Cause of Action: Common Law Fraud, Deceit and/or Misrepresentation**  
 21           **(On Behalf of the Class)**

22           164. Plaintiffs reallege and incorporate by reference all preceding paragraphs alleged  
 23 herein.

24           165. Defendants fraudulently and deceptively informed Plaintiffs and Class members  
 25 that "Only your tracking number will be sent to [UPS/FedEx/USPS]" when using the Widget.  
 26 Google displayed that representation in the Widget on Google Search. UPS, knowing that the  
 27 representation was false, substantially assisted the fraud by integrating its package tracking  
 28

1 API with the Widget and configuring its website to cause the undisclosed transmissions  
2 described above during UPS tracking transactions.

3 166. However, despite Google's representations otherwise, Defendants caused the  
4 package carrier to receive or collect information other than the tracking number, and the Third  
5 Parties to receive or collect additional information, including Private Communications, using  
6 third-party resources and corresponding software code to collect such information. These  
7 resources and the corresponding software code allowed the Third Parties to access, intercept,  
8 read, learn, record, collect, and use Plaintiffs' and Class members' Private Communications,  
9 even when consumers previously understood, based on Google's express representation, that  
10 sharing of anything other than the tracking number with the package carrier would not occur.

11 167. The falsity of the representation and the omitted facts were known exclusively  
12 to Defendants, were actively concealed by Defendants, were not reasonably known to Plaintiffs  
13 and Class members, and were material at the time the representation was made. Defendants  
14 knew, or should have known, how the Package Tracking System functioned, including the  
15 Third Parties' resources UPS installed on its website and the information or data the Track  
16 Button caused to be transmitted or disclosed, through testing the Package Tracking System,  
17 evaluating its performance metrics by means of their respective accounts with the Third  
18 Parties, or otherwise, and knew, or should have known, that the Package Tracking System's  
19 programming caused the transmission or disclosure of users' Private Communications upon  
20 clicking or selecting the Track Button, even after Google represented "Only your tracking  
21 number will be sent to [UPS/FedEx/USPS]." Defendants' misrepresentations and omissions  
22 concerned material facts that were essential to the analysis undertaken by Plaintiffs and Class  
23 members as to whether to use the Package Tracking System. In misleading Plaintiffs and Class  
24 members and not so informing them, Google breached its duty to Plaintiffs and Class members  
25 to disclose the additional transmissions necessary to make its representation not misleading.  
26 Defendants also gained financially from, and as a result of, that breach.

1           168. Plaintiffs and Class members relied to their detriment on Defendants'  
2 misrepresentations and fraudulent omissions.

3           169. Plaintiffs and Class members have suffered an injury-in-fact, including the loss  
4 of money and/or property, as a result of Defendants' unfair, deceptive, and/or unlawful  
5 practices, including the unauthorized interception of their Private Communications, including  
6 their browsing history, visit history, website interactions, user input data, demographic  
7 information, interests and preferences, shopping behaviors, device information, referring  
8 URLs, session information, user identifiers, and/or geolocation data, which have value as  
9 demonstrated by the use and sale of consumers' browsing activity, as alleged above. Plaintiffs  
10 and Class members have also suffered harm in the form of diminution of the value of their  
11 private and personally identifiable information and communications.

12           170. Defendants' actions caused damage to and loss of Plaintiffs' and Class  
13 members' property right to control the dissemination and use of their personal information and  
14 communications.

15           171. Google's representation that "Only your tracking number will be sent to  
16 [UPS/FedEx/USPS]" upon clicking or selecting the Track Button, or otherwise using the  
17 Widget, was untrue. Again, had Plaintiffs and Class members known these facts, they would  
18 not have used the Package Tracking System. Moreover, Plaintiffs and Class members reviewed  
19 the representation before they clicked or pressed the Track Button. Had Defendants disclosed  
20 that they caused the package carrier to receive or collect information other than the tracking  
21 number, or the Third Parties to receive or collect any information at all (let alone users' Private  
22 Communications), or used third-party resources to collect such information, Plaintiffs and  
23 Class members would have noticed it and would not have used the Package Tracking System.

24           172. By and through such fraud, deceit, misrepresentations and/or omissions,  
25 Defendants intended to induce Plaintiffs and Class members to alter their positions to their  
26 detriment. Specifically, Defendants fraudulently and deceptively induced Plaintiffs and Class  
27 members, without limitation, to use the Package Tracking System under the mistaken belief  
28

1 that Defendants would not permit Third Parties to obtain users' Private Communications when  
2 consumers chose to use the Widget. As a result, Plaintiffs and the Class provided more  
3 personal data than they would have otherwise.

4 173. Plaintiffs and Class members justifiably and reasonably relied on Defendants'  
5 misrepresentations and omissions, and, accordingly, were damaged by Defendants' conduct.

6 174. As a direct and proximate result of Defendants' misrepresentations and/or  
7 omissions, Plaintiffs and Class members have suffered damages, as alleged above, and are  
8 entitled to just compensation, including monetary damages.

9 175. Plaintiffs and Class members seek punitive damages because Defendants'  
10 actions—which were malicious, oppressive, and willful—were calculated to injure Plaintiffs  
11 and Class members and undertaken in conscious disregard of Plaintiffs' and Class members'  
12 rights and Plaintiffs' and Class members' consent to the disclosure of only a package tracking  
13 number to the package carrier. Punitive damages are warranted to deter Defendants from  
14 engaging in future misconduct.

15 **Fifth Cause of Action: Unjust Enrichment**  
16 **(On Behalf of the Class)**

17 176. Plaintiffs reallege and incorporate by reference all preceding paragraphs alleged  
18 herein.

19 177. Defendants created and implemented a scheme to increase their own profits  
20 through a pervasive pattern of false statements and fraudulent omissions.

21 178. Defendants were unjustly enriched as a result of their wrongful conduct,  
22 including through their misrepresentation that "Only your tracking number will be sent to  
23 [UPS/FedEx/USPS]" when users clicked or pressed the Track Button associated with the  
24 Widget. Instead, Defendants caused users' browsers to transmit users' Private Communications  
25 to Third Parties and others along with the package tracking number, including users' browsing  
26 history, visit history, website interactions, user input data, demographic information, interests  
27 and preferences, shopping behaviors, device information, referring URLs, session information,  
28 user identifiers, and/or geolocation data, despite users never consenting to the disclosure of

1 anything other than the package tracking number to the package carrier or any information to  
2 the Third Parties.

3 179. Plaintiffs' and Class members' Private Communications have conferred an  
4 economic benefit on Defendants. Google obtained advertising and profiling benefits from its  
5 collection and use of those communications through its Analytics and DoubleClick platforms.  
6 On information and belief, UPS obtained benefits from using the communications collected  
7 during UPS tracking transactions to target advertising and marketing and improve the  
8 efficiency of its services, as alleged above.

9 180. Defendants have been unjustly enriched at the expense of Plaintiffs and Class  
10 members, and Defendants have unjustly retained the benefits of their unlawful and wrongful  
11 conduct.

12 181. Defendants appreciated, recognized, and chose to accept the monetary benefits  
13 that Plaintiffs and Class members conferred on Defendants to the detriment of Plaintiffs and  
14 Class members. These benefits were the expected result of Defendants acting in their pecuniary  
15 interest at the expense of Plaintiffs and Class members.

16 182. It would be unjust for Defendants to retain the value of Plaintiffs' and Class  
17 members' property and any profits earned thereon.

18 183. There is no justification for Defendants' enrichment. It would be inequitable,  
19 unconscionable, and unjust for Defendants to be permitted to retain these benefits because the  
20 benefits were procured as a result of their wrongful conduct.

21 184. Plaintiffs and Class members are entitled to restitution of the benefits  
22 Defendants unjustly retained and/or any amounts necessary to return Plaintiffs and Class  
23 members to the position they occupied prior to having their Private Communications tracked  
24 and collected by the Third Parties.

25 185. Plaintiffs plead this claim separately, as well as in the alternative, to their other  
26 claims, and seek equitable restitution to the extent their remedies at law are inadequate.

**PRAYER FOR RELIEF**

**WHEREFORE**, reserving all rights, Plaintiffs, on behalf of themselves and the Class and Subclass members, respectfully request judgment against Defendants as follows:

A. Certification of the proposed Class and Subclass, including appointment of Plaintiffs' counsel as class counsel;

B. An award of compensatory damages, including statutory damages where available, to Plaintiffs, Class members, and Subclass members against Defendants for all damages sustained as a result of Defendants' wrongdoing, including both pre- and post-judgment interest thereon;

C. An award of punitive damages;

D. An award of nominal damages;

E. An order for full restitution;

F. An order requiring Defendants to disgorge revenues and profits wrongfully obtained;

G. An order temporarily and permanently enjoining Defendants from continuing the unlawful, deceptive, fraudulent, and unfair business practices alleged in this Complaint;

H. An award of reasonable attorneys' fees and the costs of suit incurred; and

I. An order providing any such further relief as may be just and proper.

Dated: October 9, 2026

**GUTRIDE SAFIER LLP**

/s/Seth A. Safier/s/

Seth A. Safier (State Bar No. 197427)

seth@gutridesafier.com

Marie A. McCrary (State Bar No. 262670)

marie@gutridesafier.com

Todd Kennedy (State Bar No. 250267)

todd@gutridesafier.com

100 Pine Street, Suite 1250

San Francisco, CA 94111

Telephone: (415) 639-9090

Facsimile: (415) 449-6469

*Attorneys for Plaintiffs*

# ClassAction.org

This complaint is part of ClassAction.org's searchable [class action lawsuit database](#)

---