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*Interim Co-Lead Counsel for
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

PETER LANDSHEFT, individually and on behalf of all others similarly situated,

Plaintiffs,

V.

APPLE INC., a California Corporation,
Defendant.

COVINGTON & BURLING LLP
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MEGAN L. RODGERS (SBN 310344)
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Counsel for Defendant Apple Inc.

Civil Case No.: 5:25-cv-02668-NW

**JOINT NOTICE OF SETTLEMENT AND
STIPULATION AND [PROPOSED] ORDER
TO VACATE CASE DEADLINES**

Action filed: March 19, 2025

Honorable Noël Wise

1 Pursuant to Civ. L.R. 7-12, Plaintiffs and Defendant Apple Inc. (collectively, the “Parties”), by
 2 and through their undersigned counsel of record, hereby stipulate as follows:

3 WHEREAS, the Parties have reached an agreement in principle to resolve this matter on a
 4 classwide basis;

5 WHEREAS, the Parties are currently in the process of memorializing that agreement in a formal
 6 settlement agreement;

7 WHEREAS, to facilitate the final settlement and resolution of this matter and to allow the parties
 8 to focus their efforts on finalizing and effectuating that resolution, the Parties request that all current dates
 9 and deadlines, including the January 7, 2026 hearing on Apple’s Motion to Dismiss, be vacated;

10 WHEREAS, once the settlement agreement and ancillary documents are drafted, negotiated and
 11 finalized, Plaintiffs will file a motion for preliminary approval of the settlement;

12 NOW, THEREFORE, subject to approval by the Court, it is hereby stipulated and agreed by the
 13 Parties through their respective undersigned attorneys of record that:

- 14 1. All current dates and deadlines, including the January 7, 2026 hearing on Apple’s Motion to
 15 Dismiss, are hereby vacated.
 16 2. On or before March 18, 2026, the Parties shall file a joint report updating the Court on the
 17 status of the settlement or Plaintiffs shall file a motion for preliminary approval by that date.

18 Respectfully submitted,

19 DATED: December 18, 2025

COVINGTON & BURLING LLP

21 By: /s/ Emily Johnson Henn

22 EMILY JOHNSON HENN (SBN 269482)
 23 KATHRYN E. CAHOY (SBN 298777)
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Attorneys for Defendant Apple Inc.

1
2 Dated: December 18, 2025

CLARKSON LAW FIRM, P.C.

3 By: /s/ Ryan J. Clarkson
4 RYAN J. CLARKSON
5 YANA HART
6 BRYAN P. THOMPSON

7 Dated: December 18, 2025

KAPLAN FOX & KILSHEIMER LLP

8 By: /s/ Laurence D. King
9 LAURENCE D. KING
10 MATTHEW B. GEORGE
11 BLAIR E. REED

12 Dated: December 18, 2025

COTCHETT, PITRE & McCARTHY, LLP

13 By: /s/ Brian Danitz
14 BRIAN DANITZ
15 JOSEPH W. COTCHETT
16 KARIN B. SWOPE
17 PIERCE H. STANLEY
18 CAROLINE A. YUEN

19
20 *Interim Co-Lead Counsel for Plaintiffs and the*
21 *Proposed Class*

1 **[PROPOSED] ORDER**

2 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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4 Dated: _____, 2025

5 Hon. Noël Wise
6 United States District Court Judge

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1 FILER'S ATTESTATION

2 Pursuant to Civil L.R. 5-1(i)(3), I, Emily Johnson Henn, hereby attest that concurrence in the
3 filing of this document has been obtained from each of the above signatories.
4

5 DATED: December 18, 2025

6 By: /s/ Emily Johnson Henn

7 Emily Johnson Henn

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