

CLARKSON LAW FIRM, P.C.
RYAN J. CLARKSON (SBN 257074)
rclarkson@clarksonlawfirm.com
YANA HART (SBN 306499)
yhart@clarksonlawfirm.com
22525 Pacific Coast Highway
Malibu, CA 90265
Tel: (213) 788-4050

KAPLAN FOX & KILSHEIMER LLP
LAURENCE D. KING (SBN 206423)
lking@kaplanfox.com
MATTHEW B. GEORGE (SBN 239322)
mgeorge@kaplanfox.com
1999 Harrison Street, Suite 1501
Oakland, CA 94612
Tel: 415-772-4700

COTCHETT, PITRE & MCCARTHY, LLP
JOSEPH W. COTCHETT (SBN 36324)
jcotchett@cpmlegal.com
BRIAN DANITZ (SBN 247403)
bdanitz@cpmlegal.com
KARIN B. SWOPE (*Appearance Pro Hac Vice*)
kswope@cpmlegal.com
CAROLINE A. YUEN (SBN 354388)
cyuen@cpmlegal.com
840 Malcolm Road
Burlingame, California 94010
Tel: (650) 697-6000

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

COVINGTON & BURLING LLP
EMILY JOHNSON HENN (SBN 269482)
ehenn@cov.com
KATHRYN E. CAHOY (SBN 298777)
kcahoy@cov.com
MEGAN L. RODGERS (SBN 310344)
mrodgers@cov.com
3000 El Camino Real,
5 Palo Alto Square, 10th Floor
Palo Alto, CA 94306-2112
Tel: (650) 632-4712

Counsel for Defendant Apple Inc.

**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.

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

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

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

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

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

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

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

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

Respectfully submitted,

DATED: December 18, 2025

COVINGTON & BURLING LLP

By: /s/ Emily Johnson Henn

EMILY JOHNSON HENN (SBN 269482)
KATHRYN E. CAHOY (SBN 298777)
MEGAN L. RODGERS (SBN 310344)
COVINGTON & BURLING LLP
3000 El Camino Real
5 Palo Alto Square, 10th Floor
Palo Alto, California 94306-2112
Telephone: (650) 632-4700
Facsimile: (650) 632-4800

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

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

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2025

Hon. Noël Wise
United States District Court Judge

FILER'S ATTESTATION

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

DATED: December 18, 2025

By: /s/ Emily Johnson Henn

Emily Johnson Henn