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25 *Counsel for Defendant Apple Inc.*

26 **UNITED STATES DISTRICT COURT**

27 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

28 **SAN JOSE DIVISION**

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

31 Plaintiffs,

32 v.

33 APPLE INC., a California Corporation,

34 Defendant.

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

36 **JOINT NOTICE OF SETTLEMENT AND
 37 STIPULATION AND ~~[PROPOSED]~~ ORDER
 38 TO VACATE CASE DEADLINES**

39 Action filed: March 19, 2025

40 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)
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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

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13 By: /s/ Brian Danitz
14 BRIAN DANITZ
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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*

[PROPOSED] ORDER

PURSUANT TO STIPULATION AND AS MODIFIED, IT IS SO ORDERED

1. All current dates and deadlines, including the January 7, 2026 hearing on Apple's Motion to Dismiss, are hereby vacated. **The Court terminates Defendant's motion to dismiss without prejudice to re-file should the parties not file a motion for approval of settlement.**
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. **The Court SETS a compliance hearing regarding the status of settlement for March 25, 2026 at 10:00 a.m.**

Dated: December 19, 2025


Hon. Noël Wise
United States District Court Judge

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.
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5 DATED: December 18, 2025

6 By: /s/ Emily Johnson Henn

7 Emily Johnson Henn

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