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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 STIPULATION AND [PROPOSED] ORDER TO EXTEND SETTLEMENT NOTICE DATE, CLAIMS DEADLINE, AND OBJECTION AND EXCLUSION DEADLINES

Action filed: March 19, 2025

Honorable Noël Wise

Pursuant to this Court's Order Granting Preliminary Approval, ECF No. 94, Plaintiffs and Defendant Apple Inc. (collectively, the "Parties"), by and through their respective counsel of record, hereby jointly stipulate to and respectfully request the Court's approval of a modest extension to the Settlement Notice Date, Claims Deadline, and Objection and Exclusion deadlines.

In this Court's Order Granting Preliminary Approval, it stated: "If, for any reason, the Settlement Notice Date does not or cannot commence at the time specified above, the Parties will confer in good faith and recommend a corresponding extension of the Claims Deadline and, if necessary, appropriate extensions to the Objection and Exclusion deadlines, to the Court." ECF No. 94 ¶ 21. Further, the Court Order states that it "may, for good cause, extend any of the deadlines set forth in this Preliminary Approval Order without further notice to the Settlement Class Members." ECF No. 94 ¶ 20.

The Parties have been working diligently and in good faith with the Settlement Administrator to prepare all required materials for class notice to begin. Given the complexity of the robust notice plan contemplated by the Settlement Agreement and to ensure the Parties and Settlement Administrator have sufficient time to finalize details of and implement that plan in accordance with further guidance from the mediator,[1] the Parties respectfully request a three-week extension on the date notice will begin, which would move the start of the notice period from Monday, August 31, 2026, to Monday, September 21, 2026, and to move the Objection and Exclusion dates back commensurately. This modest extension also would have the benefit of moving the Claims Deadline from the Sunday of Thanksgiving weekend, where it would fall under the Court's current Preliminary Approval Order, to mid-December, which the Parties expect would have attendant benefits to increasing the claims rate for the settlement. Moreover, this extension could be accomplished without moving the Final Approval Hearing date or the deadlines associated with final approval briefing, which are triggered by the hearing date.

Accordingly, the Parties agree and stipulate to and jointly request a ruling from the Court that good cause exists to extend the current deadlines by approximately three weeks, as reflected in the table below.

[1] Because the hearing before the mediator resulting in this stipulation took place on August 27, the parties are unfortunately unable to comply with this Court's Standing Order requiring three business days' notice for requests for extensions of time.

Event	Deadline Calculation	New Date
Commencement Date for Notice Period		Monday, September 21, 2026
Motion for Attorneys' Fees, Reimbursement of Expenses, and Service Payments to be filed by Plaintiffs' Counsel	35 calendar days before the Objection and Exclusion Deadline	Monday, November 16, 2026
Claims Deadline (submission deadline for Claims)	91 calendar days after the Notice Date	Monday, December 21, 2026
Objection Deadline (filing deadline for Objections)	91 calendar days after the Notice Date	Monday, December 21, 2026
Exclusion Deadline (deadline to submit Opt-Outs)	91 calendar days after the Notice Date	Monday, December 21, 2026
Exclusion List Deadline	7 calendar days after the Objection and Exclusion Deadline	Monday, December 28, 2026
Claim Validation Deadline	10 calendar days after the Claim Deadline	Thursday, December 31, 2026

Moving the above-listed dates back approximately three weeks as reflected in the table above does not alter the dates the Court has set for the Final Approval Hearing or the final approval briefing, which remain as follows:

Event	Deadline Calculation	Date
Motion for Final Approval	35 calendar days prior to the Final Approval Hearing	Wednesday, January 20, 2027
Objector Counsel Appearance Deadline	14 calendar days before Final Approval Hearing	Wednesday, February 10, 2027
Deadline to Respond to Objections	7 calendar days prior to the Final Approval Hearing	Wednesday, February 17, 2027
Final Approval Hearing	At least 60 calendar days after Objection and Exclusion Deadline	Wednesday, February 24, 2027 at 9:00 AM

NOW, THEREFORE, the Parties hereby stipulate and agree, subject to the approval of the Court that:

1. The Settlement Notice shall commence on Monday, September 21, 2026.
2. Plaintiffs' Counsel's Motion for Attorneys' Fees, Reimbursement of Expenses, and Service Payments to be filed by Monday, November 16, 2026.
3. The Claims Deadline shall be Monday, December 21, 2026.
4. The Objection Deadline shall be Monday, December 21, 2026.
5. The Exclusion Deadline shall be Monday, December 21, 2026.

6. The Exclusion List Deadline shall be Monday, December 28, 2026.

7. The Claim Validation Deadline shall be Thursday, December 31, 2026.

Respectfully submitted,

Dated: August 28, 2026

COVINGTON & BURLING LLP

By: */s/ Emily Johnson Henn*

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KATHRYN E. CAHOY (SBN 298777)
MEGAN L. RODGERS (SBN 310344)

Attorneys for Defendant Apple Inc.

Dated: August 28, 2026

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RYAN J. CLARKSON
YANA HART
BRYAN P. THOMPSON

Dated: August 28, 2026

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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: August 28, 2026

By: */s/ Emily Johnson Henn*

Emily Johnson Henn

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

_____
Honorable Noël Wise
United States District Judge

Public court record.

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Court: U.S. District Court, Northern District of California
Case number: 5:25-cv-02668-NW

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