NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

A court authorized this Notice. This is not a solicitation from a lawyer.

If you purchased an iPhone 16, iPhone 16e, iPhone 16 Plus, iPhone 16 Pro, iPhone 16 Pro Max, iPhone 15 Pro, or iPhone 15 Pro Max between June 10, 2024 and March 29, 2025, you should read this Notice as it may impact your legal rights.

- A settlement has been reached with Apple Inc. ("Apple") in a class action lawsuit brought on behalf of purchasers who alleged that they purchased certain iPhone devices expecting to receive certain Siri Apple Intelligence features that they allegedly did not receive. Apple denies all of the allegations made in the lawsuit and denies that Apple did anything improper or unlawful. The proposed Settlement is not an admission of guilt or wrongdoing of any kind by Apple.
- The Settlement provides for a $250 million Total Settlement Amount out of which payments will be made to Settlement Class Members who are purchasers of an iPhone 16, iPhone 16e, iPhone 16 Plus, iPhone 16 Pro, iPhone 16 Pro Max, iPhone 15 Pro, or iPhone 15 Pro Max (collectively, "Eligible Devices") who reside in the United States and purchased an Eligible Device in the United States for purposes other than resale between June 10, 2024, and March 29, 2025. The Settlement Class excludes Apple; any entity in which Apple has a controlling interest; Apple's directors, officers, and employees; and Apple's legal representatives, successors, and assigns. Also excluded from the Settlement Class are all judicial officers assigned to this case as well as their staff and immediate family members.
- If you believe you are a Settlement Class Member, you must submit a valid Claim Form to get a payment from the Settlement. Settlement Class Members may submit a claim for each Eligible Device they claim to have purchased in the United States between June 10, 2024, and March 29, 2025, and must also confirm that, at the time of their purchase(s), they expected to receive certain Siri Apple Intelligence features that they did not receive. Settlement Class Members who submit valid claims shall receive a payment of $25 per Eligible Device. The payment amount may be increased pro rata, up to a maximum of $95 per Eligible Device, or decreased pro rata depending on the total number of valid claims submitted and Eligible Devices claimed, as well as the amount of any attorneys' fees or Service Awards awarded by the Court and notice and administrative costs. The final amount you may receive will not be known until all claims are evaluated. Please see the information in this Notice concerning payments.
- If you believe you are a member of the Settlement Class, you may make a claim by going to **www.SmartphoneAISettlement.com** and following the instructions on how to submit a Claim Form.
- You can also opt out of or object to the Settlement.
- Your rights are affected whether you act or don't act. Please read this Notice carefully.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS		
Option	**Explanation**	**Deadline**
Stay in the Settlement Class, File a Claim Form, and Receive a Payment	If you received an email or postcard notifying you that you may be a member of the Settlement Class, or you believe that you are a member of the Settlement Class, you must submit a valid Claim Form to receive a Class Payment. The Claim Form requires that you provide your current contact information and confirm the following: (a) you purchased an Eligible Device and you expected to receive certain Siri Apple Intelligence features on your device at the time of purchase, which you did not; (b) you purchased an Eligible Device between June 10, 2024, and March 29, 2025; and (c) information sufficient to confirm your purchase of the Eligible Device. This is the only way to get a payment. By receiving a payment, Settlement Class Members will give up rights and be bound by the Settlement.	December 21, 2026
Exclude Yourself	Get no payment. This is the only option that allows you to keep your right to bring any other claim against Apple arising out of or related to the claims in this case. You may only request exclusion for yourself. No member of the Settlement Class (or any other person) may request exclusion from the Settlement Class for anyone but himself, herself, or themself unless the Settlement Class Member is a minor or entity, in which case an authorized representative may request exclusion only on behalf of the minor or entity he or she represents. Group opt outs, including "mass" or "class" opt outs, are prohibited.	December 21, 2026
Comment On or Object to the Settlement and/or Attend a Hearing	You can write to the Court about why you like or do not like the Settlement. You cannot ask the Court to order a larger settlement.	December 21, 2026
Do Nothing	Give up rights and be bound by the Settlement.	

- These rights and options–**and the deadlines to exercise them**–are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved.

WHAT THIS NOTICE CONTAINS

BASIC INFORMATION 4

1. Why did I get this Notice? 4
2. What is this lawsuit about? 4
3. What is a class action? 4
4. Why is there a Settlement? 4

WHO IS IN THE SETTLEMENT? 4

5. Who is in the Settlement? 4
6. What should I do if I am still not sure whether I am included? 4

THE SETTLEMENT BENEFITS 5

7. What does the Settlement provide? 5
8. Who can get money from the Settlement, and how much? 5
9. What am I giving up if I stay in the Class? 5

HOW TO GET A PAYMENT 5

10. How can I get a payment? 5
11. When will I get my payment? 5
12. How can I verify or update my mailing address? 5

THE LAWYERS REPRESENTING THE CLASS 5

13. Do I have a lawyer in the case? 5
14. Should I get my own lawyer? 5
15. How will the lawyers be paid? 6

EXCLUDING YOURSELF FROM THE SETTLEMENT 6

16. How do I get out of the Settlement? 6
17. If I don't opt out, can I sue Apple for the same thing later? 6
18. What happens if I opt out? 6

OBJECTING TO THE SETTLEMENT 6

19. How do I tell the Court if I do not like the Settlement? 6
20. What is the difference between objection and exclusion? 7

THE COURT'S FINAL APPROVAL HEARING 7

21. When and where will the Court decide whether to approve the Settlement? 7
22. Do I have to come to the Final Approval Hearing? 7
23. May I speak at the hearing? 7

IF I DO NOTHING 8

24. What happens if I do nothing at all? 8

GETTING MORE INFORMATION 8

25. Are more details about the Settlement available? 8
26. How do I get more information? 8

BASIC INFORMATION

1. Why did I get this Notice?

A court authorized this Notice because purchasers of Eligible Devices have the right to know about a legal settlement. If you qualify as a Settlement Class Member, you can get a payment.

To find out if you qualify, see Questions 5-6 below.

This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

Judge Noël Wise of the United States District Court for the Northern District of California is in charge of this case and will decide whether to approve the Settlement. The case is entitled *Landsheft, et al. v. Apple Inc.*, Case No. 5:25-cv-02668 (N.D. Cal.). PLEASE DO NOT CALL THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT.

If you have questions about the Settlement, you can visit the website **www.SmartphoneAISettlement.com**, call toll-free 1-888-988-8945 or write to the Settlement Administrator at the address below for more information.

Landsheft, et al. v. Apple Inc.
Settlement Administrator
P.O. Box 301132
Los Angeles, CA 90030-1132

2. What is this lawsuit about?

Plaintiffs allege that purchasers of iPhone 16, iPhone 16e, iPhone 16 Plus, iPhone 16 Pro, iPhone 16 Pro Max, iPhone 15 Pro, and iPhone 15 Pro Max devices were harmed by Apple's alleged failure to timely deliver certain Apple Intelligence features and brought claims including alleged violations of various states' consumer protection laws. Apple denies all of the allegations made in the lawsuit and denies that Apple did anything improper or unlawful. Apple asserts numerous defenses to the claims in this case. The proposed settlement to resolve this case is not an admission of guilt or wrongdoing of any kind by Apple.

3. What is a class action?

In a class action, one or more individuals and/or entities called "class representatives" sue on behalf of themselves and other individuals and/or entities who have similar claims. This group of individuals and/or entities is called the "class," and the individuals and/or entities in the class are called "class members." One court resolves the issues for all class members, except for people who exclude themselves from the class.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or Apple. Instead, both sides agreed to a Settlement. That way, they avoid the costs and risks of a trial, and the allegedly affected Settlement Class Members can get benefits or compensation. The Class Representatives and their attorneys think the Settlement is best for the Class.

WHO IS IN THE SETTLEMENT?

5. Who is in the Settlement?

The Settlement Class includes all purchasers of an iPhone 16, iPhone 16e, iPhone 16 Plus, iPhone 16 Pro, iPhone 16 Pro Max, iPhone 15 Pro, or iPhone 15 Pro Max (collectively, "Eligible Devices") who reside in the United States and purchased an Eligible Device in the United States for purposes other than resale between June 10, 2024, and March 29, 2025. The Settlement Class excludes Apple; any entity in which Apple has a controlling interest; Apple's directors, officers, and employees; and Apple's legal representatives, successors, and assigns. Also excluded from the Settlement Class are all judicial officers assigned to this case as well as their staff and immediate family members. The "Class Period" is June 10, 2024, to March 29, 2025.

6. What should I do if I am still not sure whether I am included?

If you are still not sure whether you are included in the Settlement Class, you can visit the website **www.SmartphoneAISettlement.com**, call toll-free 1-888-988-8945, or write to the Settlement Administrator at the address below for more information.

Landsheft, et al. v. Apple Inc.
Settlement Administrator
P.O. Box 301132
Los Angeles, CA 90030-1132

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

Apple will pay $250 million into a settlement fund. After deduction of the costs of notice and settlement administration, taxes, any award of attorneys' fees, litigation costs, and any Service Awards for the Class Representatives, the funds will be distributed to Settlement Class Members in accordance with a plan of allocation that accounts for the number of valid claims submitted by the Settlement Class Members. The plan of allocation is described in detail in the Settlement Agreement available at **www.SmartphoneAISettlement.com**.

We will not know the final amounts each Settlement Class Member will receive until the Settlement Administrator determines the total number of eligible Settlement Class Members who personally submitted valid claims.

8. Who can get money from the Settlement, and how much?

Settlement Class Members must submit a valid Claim Form to receive payment from the Settlement. Settlement Class Members who submit valid claims shall receive a cash payment of $25 per device, which may be adjusted up or down with a maximum payment of $95 per device. The payment amount may be increased or decreased pro rata depending on the total number of valid claims submitted and Eligible Devices claimed, as well as the amount of any attorneys' fees or Service Awards awarded by the Court and notice and administrative costs.

The final amount you may receive will not be known until all claims are evaluated. The plan of allocation is described in detail in the Settlement Agreement available at **www.SmartphoneAISettlement.com**.

9. What am I giving up if I stay in the Class?

Unless you exclude yourself with an opt-out request (*see* Question 16), you cannot sue, continue to sue, or be part of any other lawsuit against Apple based on, arising out of, or related to the claims in this case. The "Releases" section in the Settlement Agreement describes the legal claims that you give up if you remain a Settlement Class Member. The Settlement Agreement can be viewed at **www.SmartphoneAISettlement.com**.

HOW TO GET A PAYMENT

10. How can I get a payment?

In order to receive a payment, you must personally complete and submit a valid Claim Form by **December 21, 2026**. You can submit a claim for each Eligible Device. The Claim Form requires that you provide your current contact information and confirm the following: (a) you purchased an Eligible Device and you expected at the time of purchase to receive certain Siri Apple Intelligence features on your device, which you did not; (b) you purchased an Eligible Device between June 10, 2024, and March 29, 2025; and (c) information sufficient to confirm your purchase and/or ownership of the Eligible Device.

You can access the Claim Form on **www.SmartphoneAISettlement.com**. If you believe you are a member of the Settlement Class, you may make a claim by going to **www.SmartphoneAISettlement.com** and following the instructions on how to submit a Claim Form. You may elect to receive payment by physical check or digital check. If you do not personally complete and submit a valid Claim Form, you will not receive a payment.

11. When will I get my payment?

The Court will hold a hearing on **February 24, 2027, at 9:00 a.m.** (the "Final Approval Hearing"), to decide whether to approve the Settlement. The Court may move the Final Approval Hearing to a different date or time without providing further Notice to the Class. The date and time of the Final Approval Hearing can be confirmed at **www.SmartphoneAISettlement.com**. If the Settlement is approved, there may be appeals. The appeal process can take time. If there is no appeal, your settlement benefit will be processed promptly. Please be patient.

Updates regarding the Settlement and when payments will be made will be posted at **www.SmartphoneAISettlement.com**.

12. How can I verify or update my mailing address?

See Question 10, above.

THE LAWYERS REPRESENTING THE CLASS

13. Do I have a lawyer in the case?

Yes. The Court appointed Clarkson Law Firm, P.C., Kaplan Fox & Kilsheimer LLP, and Cotchett, Pitre & McCarthy, LLP to represent you and the other Class Members. These firms are called Class Counsel. You will not be charged for their services.

14. Should I get my own lawyer?

You do not need to hire your own lawyer, as Class Counsel is working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer's services. For example, you can ask your own lawyer to appear in Court if you want someone other than Class Counsel to speak for you. You may also appear for yourself without a lawyer.

15. How will the lawyers be paid?

Plaintiffs' Counsel will ask the Court for an award of reasonable attorneys' fees and litigation expenses, and for Service Awards to the Class Representatives of up to $2,000 each. The Court will determine these amounts. All of these amounts, as well as the costs associated with notice and administering the Settlement, will be paid from the $250 million Total Settlement Amount.

A copy of Plaintiffs' Counsel's Motion for Attorneys' Fees and Expenses and for Class Representative Service Awards will be available at **www.SmartphoneAISettlement.com** by **November 17, 2026**.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from the Settlement and you want to keep your right, if any, to sue Apple on your own about the legal issues in this case, then you must take steps to get out of the Settlement. This is called excluding yourself from–or "opting out" of–the Settlement Class.

16. How do I get out of the Settlement?

To request to be excluded from the Settlement, you must timely submit an individual written request for exclusion to the Settlement Administrator by mailing your Request for Exclusion to:

Landsheft, et al. v. Apple Inc.
Settlement Administrator
P.O. Box 301132
Los Angeles, CA 90030-1132

You may submit a Request for Exclusion only on your own behalf. No member of the Settlement Class (or any other person) may request exclusion from the Settlement Class for anyone but himself, herself, or themself unless the Settlement Class Member is a minor or entity, in which case an authorized representative may request exclusion only on behalf of the minor or entity he or she represents. Group opt outs, including "mass" or "class" opt outs, are prohibited.

Your Request for Exclusion must:

- Include the case name and number: *Landsheft, et al. v. Apple Inc.*, Case No. 5:25-cv-02668 (N.D. Cal.);
- Include your full name, address, and telephone number;
- Be personally signed and dated by you; and
- Contain a clear request that you would like to "opt out" or be excluded, by use of those or other words clearly indicating a desire not to participate in the Settlement.

Requests for Exclusion must be postmarked no later than **December 21, 2026**.

17. If I don't opt out, can I sue Apple for the same thing later?

No. Unless you opt out, you give up the right to bring any other claim against Apple based on, arising out of, or related to the claims in this case. You must exclude yourself from the Class if you want to try to pursue your own lawsuit.

18. What happens if I opt out?

If you opt out of the Settlement, you will not have any rights as a member of the Settlement Class under the Settlement; you will not receive any payment as part of the Settlement; you will not be bound by any further orders or judgments in this case; and you will keep the right, if any, to sue on any claims against Apple based on, arising out of, or related to the claims in this case at your own expense. If a Settlement Class Member submits both a Claim Form and a timely request for exclusion, the exclusion shall take precedence and be considered valid and binding unless it is withdrawn.

OBJECTING TO THE SETTLEMENT

19. How do I tell the Court if I do not like the Settlement?

If you are a member of the Settlement Class and do not opt out of the Settlement, you can ask the Court to deny approval of the Settlement by filing an objection. You can also object to the requested award of attorneys' fees and expenses to Plaintiffs' Counsel or Service Awards to the Class Representatives. The Court will consider your views. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no settlement payments will be sent out, and the lawsuit will continue. If that is what you want to happen, you must object.

Any objection to the proposed Settlement must be in writing. If you file a timely written objection, you may (but are not required to) appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

To object, you must file a document with the Court saying that you object to the proposed Settlement in *Landsheft, et al. v. Apple Inc.*, Case No. 5:25-cv-02668 (N.D. Cal.). Be sure to include:

- Your full name, mailing address, telephone number, email address, and signature. If you are represented by counsel, you must include your counsel's name, mailing address, email address, and telephone number.
- The case name and number: *Landsheft, et al. v. Apple Inc.*, Case No. 5:25-cv-02668 (N.D. Cal.).
- Information sufficient to verify that you are a member of the Settlement Class.
- A detailed statement of your objection, including all the grounds for the objection together with any evidence that you think supports it.
- A statement whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class.
- A list of all cases in which you or your counsel have filed an objection within the past five years.
- A statement whether you or your counsel intends to speak at the Final Approval Hearing.

You can file the objection electronically at https://ecf.cand.uscourts.gov/, file the objection in person at any location of the United States District Court for the Northern District of California, or mail the objection by First Class U.S. Mail, so that it is submitted electronically or postmarked no later than **December 21, 2026**, to the following address:

Clerk of Court
U.S. District Court for the Northern District of California
Robert F. Peckham Federal Building & United States Courthouse
280 South 1st Street
San Jose, CA 95113
Case No. 5:25-cv-02668-NW

If you do not mail or electronically file the objection, you must have it delivered in person to the above address no later than **December 21, 2026**.

20. What is the difference between objection and exclusion?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and telling the Court that you do not want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because it no longer affects you. You cannot both opt out and object to the Settlement.

THE COURT'S FINAL APPROVAL HEARING

21. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing on **February 24, 2027, at 9:00 a.m.** at the United States District Court for the Northern District of California, San Jose Courthouse, 280 South 1st Street, Courtroom 3 – 5th Floor, San Jose, CA 95113.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to Settlement Class Members who have asked to speak at the hearing.

The Court may also decide how much Class Counsel should receive in attorneys' fees and expense reimbursements and the Class Representatives should receive in Service Awards. After the hearing, the Court will decide whether to approve the Settlement.

The Court may reschedule the Final Approval Hearing or change any of the deadlines described in this Notice. The date of the Final Approval Hearing may change without further notice to Class Members. Be sure to check the website, **www.SmartphoneAISettlement.com** for news of any such changes. You can also access the case docket via the Court's Public Access to Court Electronic Records (PACER) system at https://ecf.cand.uscourts.gov.

22. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you send an objection, you do not have to come to the hearing to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but that is not necessary.

23. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must include a statement in your written objection (*see* Question 19) that you intend to appear at the hearing. Be sure to include your name, address, and signature as well.

You cannot speak at the hearing if you exclude yourself from the Class.

IF I DO NOTHING

24. What happens if I do nothing at all?

If you are a Class Member and you do nothing, you will not be eligible to receive a payment from the Settlement. However, you will still be bound by the Settlement. That is, you will not receive a payment, but you will give up the rights explained in Question 9, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Apple based on, arising out of, or related to the claims in this case.

GETTING MORE INFORMATION

25. Are more details about the Settlement available?

Yes. This Notice summarizes the proposed Settlement–more details are in the Settlement Agreement and other case documents. You can get a copy of these and other documents at **www.SmartphoneAISettlement.com** or by accessing the docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at https://ecf.cand.uscourts.gov, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California at any of the Court's locations between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

PLEASE DO NOT CALL THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT.

26. How do I get more information?

The website, **www.SmartphoneAISettlement.com**, has answers to questions about the Settlement, and other information to help you determine whether you are eligible for a payment.

You can either call or write to the Settlement Administrator at:

Landsheft, et al. v. Apple Inc.
Settlement Administrator
P.O. Box 301132
Los Angeles, CA 90030-1132

Class Counsel can be reached using the following contact information:

Ryan J. Clarkson
Clarkson Law Firm, P.C.
22525 Pacific Coast Highway
Malibu, CA 90265
Telephone: (213) 788-4050
Facsimile: (213) 788-4070

Laurence D. King
Kaplan Fox & Kilsheimer LLP
1999 Harrison Street
Suite 1501
Oakland, CA 94612
Telephone: (415) 772-4700
Facsimile: (415) 772-4707

Brian Danitz
Cotchett, Pitre & McCarthy, LLP
840 Malcolm Road
Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577

Public court record.

This copy was downloaded from https://www.smartphoneaisettlement.com/case-documents/ on 2026-09-23 and is hosted, unaltered, for reference at https://chimo.ai/class-action/iphone-15-pro-max

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

Chimo hosts public court records for readers' reference; documents are unaltered copies from the court docket or the court-approved settlement website.