

Exhibit C

**SECOND AMENDMENT TO THE SETTLEMENT AGREEMENT AND RELEASE
BETWEEN GOOGLE, STATES, AND INDIVIDUAL PLAINTIFFS**

The Settlement Agreement and Release (“Settlement”) entered into between Google (as described in Section 1.19 of the Settlement), the States (as described in Section 1.47 of the Settlement), and Individual Plaintiffs (as described in Section 1.23 of the Settlement), dated between October 11 and October 13, 2023, and previously amended pursuant to the First Amendment to the Settlement Agreement and Release, dated between January 16 and January 17, 2024, is hereby further amended pursuant to Section 15.6 of the Settlement as follows:

1. Section 5.3 will be amended as follows:

5.3.1 Within fifteen (15) days of the Court’s Stipulated Order directing Google to deposit funds into escrow, Case No. 21-md-2981, ECF No. 950 (March 18, 2024), Google shall transfer \$1,000,000 into the Settlement Fund Escrow Account for settlement notice and administration.

5.3.2 Within forty-five (45) days of the Court’s Stipulated Order directing Google to deposit funds into escrow, Case No. 21-md-2981, ECF No. 950 (March 18, 2024), Google shall transfer the additional sum of \$629,000,000 into the Settlement Fund Escrow Account.

2. Section 5.5 will be amended as follows:

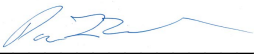
5.5.1 Within forty-five (45) days of the Court’s Stipulated Order directing Google to deposit funds into escrow, Case No. 21-md-2981, ECF No. 950 (March 18, 2024), Google shall transfer \$70,000,000 into the States’ Monetary Fund Escrow Account.

3. Section 7.1 will be further amended as follows:

7.1.1 The ICP shall be named in an addendum to this Settlement Agreement within thirty (30) days after the entry of the Notice Approval Order, unless Google and the States agree to extend the date by which the ICP shall be named.

DATED: 04/30/2024

For Plaintiffs STATES

By: 

Paula L. Blizzard

California Department of Justice
Office of the Attorney General
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102
Telephone: (415) 510-4400

DATED: _____

For INDIVIDUAL PLAINTIFFS

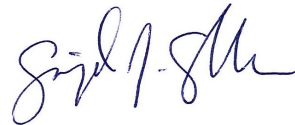
By: 

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DATED: 4/30/24

For Defendants GOOGLE LLC; GOOGLE
IRELAND LIMITED; GOOGLE
COMMERCE LIMITED; GOOGLE ASIA
PACIFIC PTE. LIMITED; and GOOGLE
PAYMENT CORP.



By: _____

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