**UNITED STATES DISTRICT COURT**
**NORTHERN DISTRICT OF CALIFORNIA**
**SAN FRANCISCO DIVISION**

**IN RE GOOGLE PLAY STORE ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

*State of Utah et al. v. Google LLC et al.*, Case No. 3:21-cv-05227-JD

*In re Google Play Consumer Antitrust Litigation*, Case No. 3:20-cv-05761-JD

Case No. 3:21-cv-05227-JD

**DECLARATION OF LANA COOPER IN SUPPORT OF STATES' UNOPPOSED MOTION FOR FINAL APPROVAL OF *PARENS PATRIAE* SETTLEMENT**

Judge: Hon. James Donato
Courtroom: 11, 19th Floor
Date: April 30, 2026 at 11:00 a.m.

I, Lana Cooper, declare and state as follows:

1. I am a Vice President with KCC Class Action Services, LLC dba Verita ("Verita"),[1] located at 1 McInnis Parkway, Suite 250, San Rafael, California. The purpose of this supplemental declaration is to provide updated information related to the proposed distribution plan (the "Distribution Plan") designed to provide distribution to Settlement Consumers in this litigation.

**VERITA's BACKGROUND AND EXPERIENCE**

2. Verita has extensive experience with all aspects of class action notice and settlement administration. Verita has administered over 10,000 class actions settlements and distributed settlement payments totaling well over a trillion dollars in assets. Verita provides comprehensive class action services, including claims administration, legal notification, email and postal mailing campaign implementation, website design, call center support, class member data management, check and voucher disbursements, tax reporting, settlement fund escrow and reporting, and other related services critical to the effective administration of class action settlements. Our experience includes many of the largest and most complex settlement administrations of both private litigation and of actions brought by state and federal government regulators.[2]

3. Further, Verita has administered matters involving government entities, including: *Bed Bath & Beyond EEOC Settlement*, Charge Nos. 210-2004-06613, 410-2007-00107, 520-2007-01838; *Eck v. City of Los Angeles*, No. BC363959 (Cal. Super. Ct.); *EEOC and BP Expl. & Prod., Inc. Conciliation Agreement*, No. 12-cv-255 (N.D. Ala.) (EEOC Houston Office); *EEOC and Michael McKinnon v. Watkins & Shepard Trucking Inc.*, Charge No. 555-210-02473 (EEOC San Jose Office); *EEOC and Temple Inland Conciliation Resolution*, Charge No. 444-2006-00599; *EEOC v. CSX Transp., Inc.*, No. 17-cv-03731 (S.D. W. Va.); *EEOC v. Dillard's, Inc.*, No. 08-cv-1780 (S.D. Cal.); *EEOC v. Lowe's Cos.*, No. 16-cv-03041 (C.D. Cal.); *EEOC v. McCormick & Schmick's Seafood Rests.*, No. 08-cv-984 (D. Md.); *EEOC v. Texas Roadhouse Settlement*, No. 11-cv-11732 (D. Mass.); *EEOC v. Wal-Mart Stores, Inc.*, Charge Nos. 560-2006-02295C, 38B-2006-

[1] KCC Class Action Services, LLC rebranded as Verita in June 2024.

[2] A list of Verita's current and past cases can be found at https://veritaglobal.com/settlement-administration-us/settlements.

00014; *In the Matter of First Republic Inv. Mgmt., Inc.*, AP No. 3-19095 (SEC); *In the Matter of Visium Asset Mgmt., LP*, AP No. 3-18473 (SEC); *Jones v. City of Los Angeles*, No. BC577267 (Cal. Super. Ct.); *LaBorde v. City of Gahanna*, No. 12-cv-8517 (Ohio Ct. Com. Pl.); *Lockman, Inc. v. City of New York*, No. 11-cv-01836 (E.D.N.Y.); *MacNamara v. City of New York*, No. 04-cv-9216 (S.D.N.Y.); *Midland/CFPB Consent Order*, No. 2015-CFPB-0022 (CFPB); *MoneyGram Payment Sys., Inc. Multistate Settlement* (Office of the Attorney General - State of Illinois); *People of the State of California v. Active Network, LLC*, No. HG16819114 (Cal. Super. Ct.); *People of the State of California v. DropBox, Inc.*, No. RLT18904840 (Cal. Super. Ct.); *People of the State of California v. E Z Rent a Car LLC*, No. RG19014872 (Cal. Super. Ct.); *People of the State of California v. eHarmony, Inc.*, No. 17-cv-03314 (Cal. Super. Ct.); *People of the State of California v. Pleasanton Fitness, LLC, et al.*, No. 16-cv-01876 (Cal. Super. Ct.); *Ramah Navajo Chapter v. Jewell*, No. 90-cv-957 (D.N.M.); *SEC v. Abatement Corp. Holding Co.*, No. 14-cv-23336 (S.D. Fla.); *SEC v. AOL Time Warner* (D.D.C.); *SEC v. AR Capital LLC*, No. 19-cv-06603 (S.D.N.Y.); *SEC v. Benger*, No. C-07393 (N.D. Ill.); *SEC v. China Energy Sav. Tech., Inc.*, No. 06-cv-6402 (E.D.N.Y.); *SEC v. Diamond Foods*, No. 14-cv-00123 (N.D. Cal.); *SEC v. EZTD, Inc.*, AP No. 3-17673 (SEC); *SEC v. i2 Techs.*, No. 04-1250 (N.D. Tex.); *SEC v. James L. Douglas a/k/a James L. Cooper*, No. 82-cv-29 (N.D. Ohio); *SEC v. Michael Hendrix*, No. C 00-20655 (N.D. Cal.); *SEC v. Murdoch Sec. & Investigations, Inc.*, No. 11-cv-07076 (S.D.N.Y.); *SEC v. Patricia Rocklage*, No. 05-CV-10074 (D. Mass.); *SEC v. Qwest Comm'cns*, No. 04-CV-02179 (D. Colo.); *SEC v. Tavella*, No. 13-cv-04609 (S.D.N.Y.); *SEC v. WellCare Health Plans, Inc.*, No. 09-cv-00910 (M.D. Fla.); *SEC v. Xerox*, No. 02-CV-02780 (S.D.N.Y.); *State of Arizona ex rel. Brnovich v. Volkswagen AG*, No. CV 2016-005112 (Ariz. Super. Ct.); *Steele v. United States*, No. 14-cv-01523 (D.D.C.); *Stuart Ishimaru v. McCormick & Schmick*, Charge No. 550-2006-02139 (EEOC San Francisco Office); *United States v. The Western Union Co.*, No. 17-CR-00011 (M.D. Pa.); *United States v. JP Morgan Chase Bank, NA*, No. 17-cv-347 (S.D.N.Y.); *United States v. HSBC Fin. Corp.*, No. 16-c-7940 (N.D. Ill.); *United States v. MoneyGram*, No. 12-CR-291 (M.D. Pa.); *Villa v. City of Chula Vista*, No. 37-2011-00093296 (Cal. Super. Ct.); *Wells Fargo Assurance Agreement* (Office of the Attorney General - California); *Illinois v. Hitachi Ltd.*, No. 12 CH 35266 (Cook Cty. Ill.); *State of Iowa v. Uber Techs.*, No. EQCE083577. In addition, Verita has handled the administration of California's Consumer Recovery Fund for consumers affected by bankrupt motor vehicle dealers who failed to fulfill contractual obligations.

**DATA SECURITY INFORMATION**

4. Verita places the highest priority on protecting data and IT assets and continually invests in strengthening its security posture. Verita accepts responsibility for the security and confidentiality of Settlement Consumer data in connection with its engagement while such data is in Verita's possession and control and will protect such data in accordance with the safeguards outlined below.

5. Verita maintains a comprehensive global information security and cybersecurity framework aligned with NIST standards, including NIST 800-53 Rev. 5 at the U.S. FedRAMP Moderate baseline. The framework covers the full spectrum of effective risk and security subject areas to comply with standards including Access Control and Identity Management, Awareness and Education, Auditability, Configuration Management, Governance, Physical Security and Safety, Insider Threat Management, Fraud Prevention, System Integrity Management, Secure Development, Supply-Chain Security, Threat and Vulnerability Management, Security Monitoring and Operations, Incident Management, and Disaster Recovery and Contingency Planning. This ensures that systems and information are accessible only to authorized personnel with a legitimate business need, safeguarded against unauthorized disclosure or modification, compliant with all regulatory and client requirements, and supported by processes for reporting, investigating, documenting, and resolving potential security weaknesses. Verita undergoes scheduled independent audits by an accredited Third-Party Assessment Organization (3PAO) and has passed the most recent audit that concluded in Q3 2025.

6. Verita employees are subject to screening processes prior to employment and are subject to confidentiality agreements as part of their standard employment terms. Mandatory training ensures that employees have the necessary resources to maintain Verita's position on information security and are aware of their responsibilities as related to their job functions.

7. Verita acts as a data processor and will receive data transfers through Secure File

Transfer Protocol ("SFTP"). The SFTP File Gateway will have a user login and password for access. Once Verita receives the files, the data will be reviewed for size and record count and removed from the FTP File Gateway.

8. Verita collects only the information necessary to administer a settlement and retains all records only as long as necessary as prescribed by applicable law, court documents, and client agreements.

9. Once data is in Verita's possession, Verita operates on the principle of "least privilege" for access control. All Verita employees are assigned unique IDs and are required to select and manage their passwords in line with Verita's rigorous password policies. The use of privileged accounts is strictly controlled and restricted to system administration and maintenance activities only. Additionally, Verita employs multifactor authentication for access to its networks and data.

10. Verita utilizes cryptographic solutions to protect data in transit and at rest. Network and wireless networks use industry-recognized leading practices to implement strong encryption for authentication and transmission, commensurate with the sensitivity of the data being transmitted. Mobile computing devices such as smartphones and laptops are encrypted.

11. Verita's office locations are protected against unauthorized physical access through the use of physical and electronic access control systems, staffed reception desks, and CCTV. Access to critical information processing locations is strictly controlled and restricted to pre-authorized individuals only. Access is logged and access rights are reviewed on a regular basis.

12. Verita's secure environment provides comprehensive disaster recovery and resiliency features to ensure business continuity and data protection. Verita uses features such as secure backup, site recovery, and distribution of services across multiple geographic locations to safeguard against regional and other failures. This allows Verita to maintain high availability, minimize downtime, and ensure data integrity during unexpected events.

13. Verita has risk-based processes to respond to any information security incident that might arise. These processes are designed to contain and control the incident, reduce any potential impact to the business, identify and investigate the root cause and implement corrective actions to reduce the risk of recurrence.

14. Verita also maintains insurance applicable to its services including professional indemnity insurance, general liability, property, comprehensive crime, electronic and computer crime, and cyber liability insurance.

## DISTRIBUTION PLAN

15. Verita anticipates receiving from the Parties a complete and consolidated source data file inclusive of Google IDs, approximately 123 million unique email addresses, 70 million phone numbers (an uncertain number of which will be mobile phone numbers), consolidated transaction dollar amounts related to each Google ID, and individualized reimbursement amounts. These email addresses and mobile phone numbers will represent the Distribution List. Verita will ingest the Distribution List into its proprietary database and remove any duplicative records. Prior to distribution, a spam cleanse will be performed on the Distribution List to remove any known 'bad' email addresses and combine any records with duplicate email addresses.[3] Then, each consumer on the Distribution List will be assigned a unique sequential control number that will be used throughout the administration process. Verita also anticipates receiving a list of timely exclusion requests from the notice administrator and will use that list to exclude from the disbursement of funds consumers who indicated that they wish to opt out of the Settlement.

### *Disbursement*

16. Verita has developed a disbursement plan that will initiate digital payments to Settlement Consumers, as that term is defined in the Settlement Agreement. Each Settlement Consumer will receive at least $2 and will receive additional payments in proportion to his or her Google Play spending from August 16, 2016, through September 30, 2023.

17. Verita will first send the payment to Settlement Consumers via PayPal. If the Settlement Consumer's email address associated with the consumer's Google Play account or provided through the settlement website matches an email address associated with an existing PayPal account, then payment will be processed to that account and the Settlement Consumer will receive

[3] It is my understanding that the notice administrator, A.B. Data, was able to validate approximately 110 million email addresses prior to the start of the notice period. Verita will attempt to validate the remaining 13 million email addresses in the data set as part of the spam cleanse process.

an email notification that the funds have been deposited and are now available. Otherwise, the Settlement Consumer will receive three reminders, on the 7th day, on the 14th day, and again on the 28th day, notifying him or her of the opportunity to create a new PayPal account or redirect the payment to an existing account at another email address. For the potential population of Settlement Consumers that do not have a valid email address available, but a valid mobile phone number, Verita will send payments using Venmo first.

18. Verita will then send payments using Venmo to Settlement Consumers who have not yet received their payments. If the Settlement Consumer's mobile phone number associated with the consumer's Google Play account or provided through the settlement website matches a mobile phone number associated with an existing Venmo account, then payment will be processed to that account. Otherwise, the Settlement Consumer will have an opportunity to create a new Venmo account or redirect the payment to an existing account at another mobile phone number.

19. Verita will perform outreach to Settlement Consumers entitled to a payment above approximately $5,000 to obtain ACH transfer or Wire Instructions or a mailing address for a check depending on the Settlement Consumer's preference.

20. In Verita's experience, which includes over 109 class action distributions in which settlement proceeds were distributed via digital token, when a payment is "pushed" to the individual without an election process, the success rate[4] ranges from 60% to 90% depending on how current the data[5] is, each individual's payment amount, and the recipients' ages and other demographics of the qualifying individuals. Based on our understanding of the demographic of Google Play users and their proclivity for digital technology, as well as the strong market share PayPal and Venmo have in this digital payment space and their continued year-over-year growth, Verita believes the waterfall

[4] Because this settlement provides for automatic payment of settlement proceeds, the focus of this Declaration is on the successful payment of funds to consumers. This is in contrast to a claims rate typical in some consumer class actions, which reflects the percentage of class members who submit a claim to participate in the settlement.

[5] The following types of contact information are required for each form of payment: PayPal – Email Address or Mobile Phone Number; Venmo – Mobile Phone Number or Email Address; Zelle – Full Name and Email Address or Mobile Phone Number; ACH – Routing Number and Account Number; Check – Full Name and Physical Address.

approach of initiating a PayPal payment first followed by Venmo for unsuccessful payments will achieve a blended success rate of 80-90%.

21. A Qualified Settlement Fund account ("QSF") will be created, and an account will be opened for the settlement fund. Verita will issue digital payments to each Settlement Consumer as directed.

22. It is my understanding that the notice administrator, A.B. Data, set up a page on the settlement website where consumers can submit their contact information and has to date received over 350,000 submissions. Once the settlement website is transferred over to Verita, Verita will establish and maintain a secure online reissue portal on the settlement website. This reissue portal will give Settlement Consumers who did not receive payment successfully the opportunity to provide updated email address and/or mobile phone number information for a re-attempt at PayPal or Venmo, or select an alternative method of payment, such as an ACH transfer or Zelle.

***Proposed Disbursement Timeline***

23. The proposed timeline for disbursement is as follows, subject to Court approval, and using the following assumptions related to the email addresses and phone numbers received from the Parties: (i) 90% of the Distribution List will contain valid email addresses that will be pushed via PayPal; (ii) 5% of the Distribution List will contain mobile phone numbers that will be pushed via Venmo. The proposed timeline is also illustrated in a graph attached hereto as **Exhibit A**.

A. *Pre-Distribution Preparation (Days 1 - 60)*

(1) Validation of recipient email addresses and mobile phone numbers for accuracy

(2) Perform Office of Foreign Assets Control ("OFAC") screening

(3) Generate payment files for digital disbursement

B. *160-Day Waterfall Distribution (Days 61 - 220)*

(1) Wave 1 of the Waterfall Distribution begins

(a) Wave 1 reflects the initial attempted batches that are released within default payout caps and processing limits. Verita recommends, on average, up to 2 million payments per day released by PayPal and up to 250,000 payments per day released by Venmo.

(i) Month 3 - 32 million PayPal released / 4 million Venmo released

(ii) Month 4 - 48 million PayPal released / 2 million Venmo released

(iii) Month 5 - 24 million PayPal released

(2) Wave 2 of the Waterfall Distribution begins

(a) Wave 2 reflects the re-attempt of payments for unsuccessful PayPal or Venmo records. Based on the assumptions for the data, Verita is anticipating 30% will be re-attempted, leveraging the contact information submissions from the settlement website and the original source data.

(i) Month 5 - 12 million released

(ii) Month 6 - 20 million released

C. *90-Day Reissue Period*

(1) Verita will activate the secure online reissue portal on the settlement website once Wave 1 of the Waterfall Distribution has been completed. Settlement Consumers will have the opportunity to request a reissuance of their payment and provide updated email address and mobile phone number information, as well as their Google ID, if known. Verita's recommendation is to delay the activation of the reissue portal until an initial attempt of payments to Eligible Consumers have been completed via PayPal or Venmo.

(2) Verita also recommends performing an email notification during this period to Settlement Consumers who are associated with an unsuccessful payment via PayPal and/or Venmo directing them to request a reissuance of payment via the secure online reissue portal.

D. *Residual Distribution*

(1) Verita intends to perform residual distribution(s) until it is no longer economically feasible to do any additional distributions. Based on Verita's experience, if the residual distribution(s) maintain the $2 minimum but are made to decreasing numbers of Settlement Consumers (i.e., those with higher Google Play spending), Verita can continue the residual distribution(s) until the Settlement Fund

has a balance of $50,000 or less.

(2) Prior to performing any residual distribution, Verita will prepare a declaration for the Parties and the Court outlining the plan for disbursement and recommendation for next steps.

**ADMINISTRATION FEES**

24. Based on the defined scope of work provided by Counsel, Verita has estimated the administration costs will be $10,785,450 as well as an additional $8,143,562 for a potential Residual Distribution, for a total of $18,929,012.

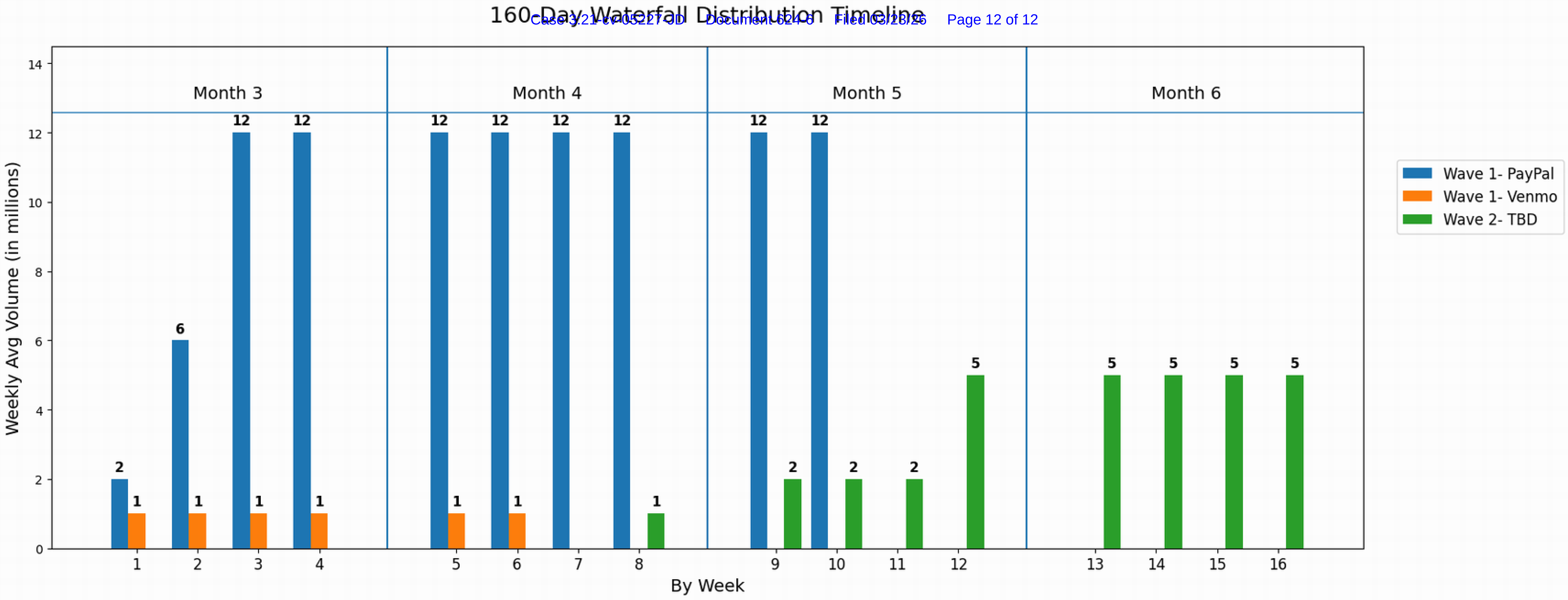
25. Verita's estimated fees and charges are based on certain information provided to Verita by the Parties as well as significant assumptions. Accordingly, the estimate is not intended to limit Verita's actual fees and charges, which may be less or more than estimated due to the scope of actual services or changes to the underlying facts or assumptions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 23, 2026 in San Rafael, California.

LANA COOPER

# Exhibit A


160-Day Waterfall Distribution Timeline
Month 3
Month 4
Month 5
Month 6
Weekly Avg Volume (in millions)
By Week
Wave 1- PayPal
Wave 1- Venmo
Wave 2- TBD
2
1
6
1
12
1
12
1
12
1
12
1
12
12
1
12
2
12
2
2
5
5
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