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Co-Lead Counsel for Consumer Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

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

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

Case No. 3:21-md-02981-JD

**STATEMENT IN SUPPORT OF
APPROVAL OF STATE-CONSUMER
SETTLEMENT AND NOTICE OF NO
OBJECTIONS TO CONSUMER
PLAINTIFFS' COUNSEL'S MOTION FOR
ATTORNEYS' FEES**

Date: April 30, 2026

Time: 11:00 a.m.

Courtroom: 11, 19th Floor

Judge: Hon. James Donato

For several years, Consumer Counsel zealously prosecuted consumers’ antitrust claims against Google, first on behalf of a putative nationwide class of consumers, and then arm-in-arm with the States following the States’ filing of *parens patriae* claims. Those efforts included playing a significant role in the mediations and negotiations leading to the State-Consumer Settlement (the “Settlement”). Having been deeply involved in the investigation and development of the claims at issue from the outset of the litigation to almost the eve of trial, Consumer Counsel have developed their own well-informed, independent assessment of the proposed Settlement. Consumer Counsel hereby inform the Court that in their professional judgment, the proposed Settlement is fair, reasonable, adequate, and should be approved. Additionally, having participated directly in the settlement negotiations, Consumer Counsel confirm that the Settlement is a product of hard-fought, arms-length negotiations, that was preferable to continued litigation.

As discussed more fully in the States’ Motion for Final Approval, notice of the proposed Settlement was emailed to more than one hundred million consumers via direct email, and was further supplemented with a digital and social media campaign. The email summary notice directed consumers to the long-form notice on the settlement website, which specifically informed eligible consumers that “[p]rivate lawyers who materially contributed to the litigation have applied to the court for an award of \$85 million in attorneys’ fees and \$8.6 million in expenses from the Settlement Fund.” Google Play State AG Antitrust Litig., *Notice – Long Form Notice*, <https://www.googleplaystateagantitrustlitigation.com/notice> (last visited Mar. 23, 2026); Google Play State AG Antitrust Litig., *FAQs*, <https://www.googleplaystateagantitrustlitigation.com/faqs> (last visited Mar. 23, 2026). The notice also informed eligible consumers that they could object to any aspect of the Settlement by February 19, 2026, which would include Consumer Counsel’s request for attorneys’ fees and expenses. *Id.*¹

¹ On December 1, 2025, Counsel for Consumer Plaintiffs submitted their renewed motion for attorneys’ fees, reimbursement of litigation expenses, and incentive awards for individual plaintiffs (“Fee Motion”). MDL Dkt. 1129. The Fee Motion details Consumer Counsel’s substantial contribution in litigating these claims, which resulted in the \$700 million settlement and negotiated injunctive relief. The Fee Motion and its supporting declarations and exhibits were also available for (Continued...)

Notably, no objections to the settlement or to Consumer Counsel's request for attorneys' fees has been made by any of the more than one hundred million consumers who were provided notice of the Settlement. The fact that there have been no objections to Consumer Counsel's request for attorneys' fees is a powerful testament to the reasonableness of Consumer Counsel's Fee Motion. *See In re Google Play Dev. Antitrust Litig.*, No. 20-cv-5792-JD, 2024 WL 150585, at *3 (N.D. Cal. Jan. 11, 2024) (approving request for attorneys' fees and reimbursement of expenses and noting "[t]he reaction of the class to this proposed settlement has been positive" because there were no objections).

For the foregoing reasons and those set forth in the Fee Motion and supporting declarations, Consumer Counsel respectfully submit that the Settlement should be approved and that the Court should grant Consumer Counsel's Fee Motion.

DATED: March 24, 2026

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eligible consumers' review on the settlement website. *Google Play State AG Antitrust Litig., Court Documents*, <https://www.googleplaystateagantitrustlitigation.com/court-documents> (last visited Mar. 23, 2026).

E-FILING ATTESTATION

I, Karma M. Giulianelli, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(h)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Karma M. Giulianelli

Karma M. Giulianelli