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15 Attorneys for Defendants Apple Inc. and Apple
Value Services LLC

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17 [Additional Counsel Listed on Signature Page]

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN JOSE DIVISION

21 CARL BARRETT, et al.,

22 Plaintiffs,

23 v.

24 APPLE INC., et al.,

25 Defendants.

Case No. 5:20-cv-04812-EJD

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF DEADLINE
FOR SETTLEMENT CLASS MEMBERS
TO FILE CLAIMS**

Dept.: Courtroom 4 – 5th Floor
Judge: Honorable Edward J. Davila

1 The undersigned counsel for Michel Polston, Nancy Martin, Maria Rodriguez, and Andrew
2 Hagene (collectively, “Plaintiffs”), and Apple Inc. and Apple Value Services LLC (collectively,
3 “Apple,” and together with Plaintiffs, the “Parties”) in the above captioned action, hereby stipulate and
4 agree as follows:

5 WHEREAS, on May 16, 2024, the Court entered an order preliminarily approving the Settlement
6 of this Action and the proposed plan of notice, ECF No. 269 (the “Preliminary Approval Order”), and
7 that Order set October 15, 2024 as the deadline for Settlement Class Members to file claims, id. at ¶11;

8 WHEREAS, the Parties and the Court-appointed Settlement Administrator, KCC Class Action
9 Services, LLC (“KCC”), have diligently executed the plan of notice approved in the Preliminary
10 Approval Order, including dissemination of direct notice to known class member via email and U.S.
11 Mail and publication notice via printed magazines and a social media campaign;

12 WHEREAS, the Parties believe it is appropriate to send a reminder notice to Settlement Class
13 Members via email and U.S. Mail that have not, to date, filed claims;

14 WHEREAS, the Parties are working with KCC to effectuate that reminder notice, but KCC has
15 advised that, in order to fully implement best practices it may not be disseminated until October 17,
16 2024;

17 WHEREAS, the requested extension of the claims deadline to October 31, 2024 will not require
18 modification of any of the other deadlines set forth in the Preliminary Approval Order, such that final
19 approval briefing and the Final Approval Hearing currently set for December 12, 2024 can proceed as
20 scheduled;

21 WHEREAS, good cause exists for the requested extension of the claims deadline, as set forth in
22 the Declaration of Nyran Rose Rasche filed concurrently herewith;

1 NOW, THEREFORE, IT IS HEREBY STIPULATED by the Parties, through their respective
2 counsel, that:

3 1. The October 15, 2024 deadline for Settlement Class Members set forth at ECF 269 shall
4 be extended by fifteen (15) days to October 31, 2024; and

5 2. The new October 31, 2024 deadline shall be reflected on the settlement administration
6 website, giftcardscamsettlement.com; and included in the supplemental reminder notice to be
7 disseminated by the administrator.

8 Dated: October 4, 2024

Respectfully submitted,

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10 CAFFERTY CLOBES MERIWETHER
& SPRENGEL LLP

11
12 By: s/ Nyran Rose Rasche
NYRAN ROSE RASCHE

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Attorneys for Plaintiffs

Dated: October 4, 2024

Respectfully submitted,

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

I, Nyran Rose Rasche, am the ECF User whose ID and password are being used to file the foregoing. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories concurred in this filing, and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

Dated: October 4, 2024

s/ Nyran Rose Rasche
NYRAN ROSE RASCHE

~~[PROPOSED]~~ ORDER

1
2 Having reviewed and considered the Parties' stipulation to extend the deadline for Settlement
3 Class Members to file claims, the relevant Parties being in agreement, and for good cause shown,
4 PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that:
5

6 1. The October 15, 2024 deadline for Settlement Class Members set forth at ECF 269 shall
7 be extended ~~by twenty one days (21) days~~ to October 31, 2024; and

8 2. The new October 31, 2024 deadline shall be reflected on the settlement administration
9 website, giftcardscamsettlement.com; and included in the supplemental reminder notice to be
10 disseminated by the administrator.

11 SO ORDERED this 7th of October, 2024

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14 EDWARD J. DAVILA
15 United States District Judge
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