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8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION
12

13 **In Re Google AdWords Litigation**

Case No. 5:08-cv-03369-EJD

**Stipulation and [~~Proposed~~] Order to
Extend Settlement Deadlines**

14
15 This Document Relates to:

16 All Actions
17
18

19 WHEREAS, on March 9, 2017, the Court granted Class Counsel’s motion for preliminary
20 approval of a class-action settlement, approval of class notice, and provisional certification of the
21 Settlement Class in this case (Dkt. No. 369, the “Preliminary Approval Order”);

22 WHEREAS, the Preliminary Approval Order required the Parties to complete notice to
23 Settlement Class Members within 30 days following entry of the order, which is April 8, 2017;

24 WHEREAS, the Preliminary Approval Order also required that the deadlines for
25 Settlement Class Members to submit claims, exclude themselves from the Settlement, and/or
26 object to the Settlement or Class Counsel’s motion for fees, costs, and service awards to the Class
27 Representatives be 60 days after the Parties complete notice, which is June 7, 2017;

STIPULATION AND [PROPOSED] ORDER
TO EXTEND SETTLEMENT DEADLINES

No. 5:08-cv-03369-EJD

1 WHEREAS, in order to complete notice, the Settlement Administrator requires a master
2 list of Settlement Class Members and their contact information from Google;

3 WHEREAS, Google encountered unforeseen technical issues in compiling and exporting
4 the list of Settlement Class Members, which have thus far prevented it from providing the class
5 list to the Settlement Administrator;

6 WHEREAS, the Parties have met and conferred, in consultation with the Settlement
7 Administrator, and believe these technical issues can be resolved and notice to Settlement Class
8 Members can be completed within two weeks of the current deadline to complete notice;

9 WHEREAS, the Parties agree that the Notice Date be extended by two weeks to April 22,
10 2017;

11 WHEREAS, the Parties further agree that the deadlines for Settlement Class Members to
12 submit claims, exclude themselves from the Settlement, and/or object to the Settlement or Class
13 Counsel's motion for fees, costs, and service awards to the Class Representatives accordingly be
14 extended by two weeks to June 21, 2017; and

15 WHEREAS, the extension of these deadlines would not require any change to the
16 deadline for Class Counsel to submit its motion for fees, costs, and service awards to the Class
17 Representatives (May 8, 2017), the deadline for Class Counsel to file its motion for final approval
18 of the Settlement (July 13, 2017), or the date of the Final Fairness Hearing (July 27, 2017);

19 THEREFORE, the Parties hereby stipulate, and respectfully ask the Court to order that
20 the following dates in its Preliminary Approval Order be modified as follows:

- 21 1. The Settlement Administrator shall complete notice to Settlement Class Members by
22 April 22, 2017 (the "Notice Date");
- 23 2. The deadlines for Settlement Class Members to submit claims, exclude themselves
24 from the Settlement, and/or object to the Settlement or Class Counsel's motion for
25 fees, costs, and service awards to the Class Representatives shall be June 21, 2017; and
- 26 3. All other deadlines in the Preliminary Approval Order and the date of the Final
27 Fairness Hearing shall remain unchanged.

1 DATED: April 7, 2017

SCHUBERT JONCKHEER & KOLBE LLP

2 BY: /s/ Noah M. Schubert
3 NOAH M. SCHUBERT

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Attorneys for Defendant Google Inc.

21 **ATTESTATION OF FILER**

22 I, Noah M. Schubert, hereby attest that concurrence in the filing of the document has
23 been obtained from each of the other signatories.

25 DATED: April 7, 2017

SCHUBERT JONCKHEER & KOLBE LLP

26 BY: /s/ Noah M. Schubert
27 NOAH M. SCHUBERT

~~[PROPOSED]~~ ORDER

Good cause appearing, pursuant to stipulation of the Parties, the following dates in the Preliminary Approval Order (Dkt. No. 369) are hereby modified as follows:

1. The Settlement Administrator shall complete notice to Settlement Class Members by April 22, 2017 (the “Notice Date”);
2. The deadlines for Settlement Class Members to submit claims, exclude themselves from the Settlement, and/or object to the Settlement or Class Counsel’s motion for fees, costs, and service awards to the Class Representatives shall be June 21, 2017; and
3. All other deadlines in the Preliminary Approval Order and the date of the Final Fairness Hearing shall remain unchanged.

IT IS SO ORDERED.

DATED: April 10, 2017

BY: 

HON. EDWARD J. DAVILA
UNITED STATES DISTRICT JUDGE