

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE ALPHABET, INC., SHAREHOLDER
DERIVATIVE LITIGATION

Case No. 21-cv-09388-RFL

**ORDER REQUESTING
SUPPLEMENTAL BRIEFING**

Re: Dkt. No. 86

The Court has reviewed Co-Lead Plaintiffs' unopposed motion for preliminary approval of settlement. The parties are ordered to address the following issues through supplemental filings (which may include supplemental declarations) by **July 1, 2025**:

1. Under the terms of the proposed settlement, the Company's commitment is to spend a *total* of \$500 million on Regulatory Readiness Compliance and Board and Management Oversight Enhancements, not to spend an *additional* \$500 million. What amount was projected to be spent on regulatory compliance and board and management oversight over the next ten years, prior to this agreement?
2. Which of the proposed corporate governance and workplace measures and enhancements, if any, had the Company already adopted prior to reaching the settlement agreement?
3. Had the Company already changed its Google Chat policy, as described in the settlement, prior to reaching the settlement agreement?
4. The Amended Complaint (Dkt. No. 84) alleges that the board was repeatedly told of red flags but ignored them because it was controlled by insiders. The

settlement, however, appears geared toward ensuring that the board is notified of red flags through the Risk and Compliance Committee, which would be assisted by the Trust and Compliance Council. How would the proposed measures address the underlying concern at the heart of the Amended Complaint?

5. By what deadline do Lead Plaintiffs' Counsel propose to file their motion for attorneys' fees, such that shareholders may have an opportunity to review it sufficiently in advance of the objection deadline?
6. Any final approval hearing would be held both in person and over Zoom. Please file an amended proposed class notice and an amended proposed preliminary approval order that reflects this fact and includes the link for the Court's public hearing webinar by **July 1, 2025**.

IT IS SO ORDERED.

Dated: June 18, 2025



RITA F. LIN
United States District Judge