

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE ALPHABET, INC., SHAREHOLDER
DERIVATIVE LITIGATION

Consolidated
Case No.: 3:21-cv-09388-RFL

Judge: Rita F. Lin

**SUMMARY NOTICE OF
PENDENCY AND PROPOSED SETTLEMENT OF DERIVATIVE ACTION**

TO: ALL PERSONS AND ENTITIES WHO CURRENTLY OWN ALPHABET INC.
COMMON STOCK

**PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.
YOUR RIGHTS WILL BE AFFECTED BY THE ACTIONS.**

YOU ARE HEREBY NOTIFIED of the pendency of the following derivative action brought in federal court: *In re Alphabet Inc., Shareholder Derivative Litigation*, Consolidated Case No. 3:21-cv-09388-RFL (the “**Action**”).

YOU ARE ALSO HEREBY NOTIFIED that the parties to the Action have reached a proposed settlement (“**Settlement**”), the terms and conditions of which are set forth in the Stipulation and Agreement of Settlement entered into on May 30, 2025 (“**Stipulation**”).

A more detailed description of the allegations and the claims asserted in the Action is set forth in the Stipulation as well as the full Notice of Pendency and Proposed Settlement of Derivative Actions (“**Notice**”), both of which are publicly available for review on Alphabet’s investor relations website at <https://abc.xyz/investor/> and on Plaintiffs’ Lead Counsel’s website at <https://scott-scott.com/sdsettlements/alphabet-derivative-settlement/>. All capitalized terms used in this Summary Notice that are not otherwise defined herein have the meanings provided in the Stipulation and/or Notice.

You may also access the case docket via PACER at <https://ecf.cand.uscourts.gov/cgi-bin/DktRpt.pl?388891>. To access PACER, you must have a user ID and password, which you can

1 obtain via <https://pacer.uscourts.gov/register-account/pacer-case-search-only>. Alternatively, please
2 e-mail Patrick Coughlin, Scott+Scott Attorneys at Law LLP, at pcoughlin@scott-scott.com and he
3 shall help provide you copies of filings in this case that you request. You may also access the case
4 docket in person by going to the Clerk's Office at the U.S. District Court for the Northern District of
5 California, 450 Golden Gate Ave., San Francisco, CA 94102. The Court also has instructions for
6 accessing court documents at: [https://cand.uscourts.gov/about/clerks-office/obtaining-copies-of-
7 court-documents/](https://cand.uscourts.gov/about/clerks-office/obtaining-copies-of-court-documents/).

8 In consideration of the Settlement and the releases provided therein, and subject to the terms
9 and conditions of the Stipulation, Alphabet has agreed to, among other things: (1) adopt and/or
10 maintain (to the extent already implemented) certain compliance measures described in the Stipulation;
11 (2) establish and maintain a Board-level Risk and Compliance Committee as described in the
12 Stipulation; (3) establish and maintain management-level committees, as described in the Stipulation;
13 (4) cause to be spent at least \$500 million over the course of up to 10 years on global compliance
14 efforts, as described in the Stipulation; and (5) maintain certain policy, process, and/or technical
15 capabilities with respect to Google Chat, as described in the Stipulation.

16 A hearing will be held on September 30, 2025, at 1:30 p.m., both in person at the San Francisco
17 Courthouse of the United States District Court for the Northern District of California, Courtroom 15,
18 18th Floor, 450 Golden Gate Ave., San Francisco, CA 94102, and online via the Court's public hearing
19 Zoom Webinar—accessible at [https://cand-
20 uscourts.zoomgov.com/j/1615482105?pwd=cTZiSVdXelllSXpjQ1p0Nm5HaXRYUT09](https://cand-uscourts.zoomgov.com/j/1615482105?pwd=cTZiSVdXelllSXpjQ1p0Nm5HaXRYUT09), Webinar
21 ID: 161 548 2105 and password: 315725 (“**Settlement Hearing**”). This date may be subject to change
22 by the Court without any further notice to the class, i.e., Alphabet stockholders. Please check Plaintiffs’
23 Lead Counsel’s website at <https://scott-scott.com/sdsettlements/alphabet-derivative-settlement/>,
24 Alphabet’s investor relations website at <https://abc.xyz/investor/>, or the Court’s PACER website at
25 <https://ecf.cand.uscourts.gov/cgi-bin/DktRpt.pl?388891> to confirm that the date has not changed. At
26 the Settlement Hearing, the Court will consider whether Judgment should be entered: (a) approving
27 the terms of the Settlement as fair, reasonable, and adequate, and in the best interests of Alphabet and
28 Alphabet’s stockholders; (b) dismissing with prejudice the Action pursuant to the terms of the
Stipulation against Defendants; and (c) ruling upon Plaintiffs’ Lead Counsel’s application for a Fee
and Expense Award; and (d) to consider any other matters that may properly be brought before the
Court in connection with the Settlement.

20 If you currently own Alphabet common stock, you may, if you wish to do so, comment to the
21 Court on the proposed Settlement, and/or Plaintiffs’ Lead Counsel’s application for a Fee and Expense
22 Award. Any written objections to the proposed Settlement and/or the applications for such Fee and
23 Expense Award should be filed with the Court and served on Plaintiffs’ Lead Counsel and Defendants’
Counsel such that they are **received no later than September 20, 2025**, in accordance with the
instructions set forth in the Notice.

24 **PLEASE NOTE:** Because the Settlement involves the resolution of stockholder derivative
25 actions, which were brought on behalf of and for the benefit of the Company, the benefits from the
26 Settlement will go to Alphabet. Individual Alphabet stockholders will not receive any direct payment
27 from the Settlement. **ACCORDINGLY, THERE IS NO PROOF OF CLAIM FORM FOR
28 STOCKHOLDERS TO SUBMIT IN CONNECTION WITH THIS SETTLEMENT. ALSO,**

1 **STOCKHOLDERS ARE NOT REQUIRED TO TAKE ANY ACTION IN RESPONSE TO**
2 **THIS SUMMARY NOTICE.**

3 **DO NOT CALL OR WRITE THE COURT OR THE OFFICE OF**
4 **THE CLERK OF THE COURT REGARDING THIS NOTICE.**

5 All questions regarding this summary notice, the Action, and the Settlement should be made to
6 Plaintiffs' Lead Counsel:

7 Patrick Coughlin
8 **Scott+Scott Attorneys at Law LLP**
9 600 W. Broadway
10 Suite 3300
11 San Diego, CA 92101

12 Dated: July 8, 2025

13 BY ORDER OF THE COURT
14 UNITED STATES FEDERAL DISTRICT
15 COURT FOR THE NORTHERN DISTRICT OF
16 CALIFORNIA, SAN FRANCISCO DIVISION