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Attorneys for Defendant Apple Inc.

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**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA**

PETER LANDSHEFT, individually and on
 behalf of all others similarly situated,

Plaintiff,

v.

APPLE INC.,

Defendant.

This Document Relates To: Case Nos. 5:25-cv-
 02914; 5:25-cv-03205; 5:25-cv-03517; 5:25-
 cv-04160

Civil Case No.: 5:25-cv-02668-NW

**STIPULATION AND ~~PROPOSED~~
 ORDER TO RELATE AND
 CONSOLIDATE ACTIONS**

Action Filed: March 19, 2025

Honorable Noël Wise

SIERRA ROBINSON, individually and
 on behalf of all others similarly situated,

Plaintiff,

v.

APPLE INC.,

Defendant.

Civil Case No.: 5:25-cv-04776-VKD

Action Filed: June 5, 2025

Honorable Virginia K. DeMarchi

SKYLER MAMONE FELDT, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

APPLE INC.,

Defendant.

Civil Case No.: 5:25-cv-04785-NC

Action Filed: June 6, 2025

Honorable Nathanael M. Cousins

Pursuant to Civil L.R. 7-12, Defendant Apple Inc. (“Apple”) and Plaintiffs Peter Landsheft Michael Hopkins, Corey Martin, Tyshaun Butler, Christian Varbanovski, Michael Accardi, Linda Andrews, Brian Beach, Patricia Bush, Devin Lloyd, and Adam Ragsdale (“Plaintiffs”) (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree as follows:

STIPULATION

1. On March 19, 2025, Plaintiff Peter Landsheft filed the Complaint in this case. *See* Dkt. 1.
2. After the filing of *Landsheft*, four other similar cases were filed in the U.S. District Court for the Northern District of California. *See Hopkins v. Apple Inc.*, No. 5:25-cv-02914; *Martin v. Apple Inc.*, No. 5:25-cv-03205; *Varbanovski v. Apple Inc.*, No. 5:25-cv-03517; *Accardi v. Apple Inc.*, No. 5:25-cv-04160.
3. On May 22, 2025, the Court entered an order consolidating the *Martin*, *Hopkins*, *Varbanovski*, and *Accardi* actions with *Landsheft* (Dkt. No. 28) and providing that the consolidation order “also applie[d] to any other cases that are subsequently filed in, removed to, or transferred to th[e] Court involving the same or substantially similar issues of law and fact as the consolidated action (*Landsheft v. Apple, Inc.*, 25-cv-02668-NW)” (each a “Subsequent Related Action”). *Id.* at 14. The Consolidation Order required Interim Co-Lead Counsel to, “within 10 days of becoming aware of such action, serve a copy of this Order on all parties in all [Subsequent Related Actions], and file a notice of service of this Order on the docket in the consolidated action.” *Id.* Any party may then “raise an objection to consolidation under this Order within 10 days after the filing of such notice,” and “absent objection such Subsequent Related

1 Action shall be consolidated under *Landsheft v. Apple, Inc.*, Case No. 25-cv-02668-NW.” *Id.*

2 4. On May 5, 2025, Plaintiff Skyler Feldt filed a complaint in the U.S. District Court for the
3 District of Utah involving the same or substantially similar issues of law and fact as the consolidated
4 *Landsheft* action, and the case was transferred to the Northern District of California on May 20, 2025. *See*
5 *Feldt v. Apple Inc.*, Case No. 5:25-cv-04785-NC (“*Feldt*”; *see* Exhibit A).

6 5. On June 5, 2025, Plaintiff Sierra Robinson filed a complaint in the U.S. District Court for
7 the Northern District of California involving the same or substantially similar issues of law and fact as the
8 consolidated *Landsheft* action. *See Robinson v. Apple Inc.*, Case No. 3:25-cv-04776-VKD (“*Robinson*”;
9 *see* Exhibit B).

10 6. On June 10, 2025, Plaintiffs served the plaintiffs in the *Feldt* and *Robinson* actions with
11 notice of the Consolidation Order and filed a Notice of Service of the Consolidation Order on the
12 *Landsheft* docket. Dkt. 35. The deadline to file any objection to consolidation was June 20, 2025. No
13 objection has been filed.

14 **NOW THEREFORE, the Parties through their respective counsel and subject to the Court’s**
15 **approval hereby stipulate and respectfully request that:**

- 16 1. The Court enter an order relating *Feldt v. Apple Inc.*, Case No. 5:25-cv-04785-NC and
17 *Robinson v. Apple Inc.*, Case No. 3:25-cv-04776-VKD with the consolidated first-filed
18 action, *Landsheft v. Apple Inc.*, 5:25-cv-02668-NW.
- 19 2. *Feldt v. Apple Inc.*, Case No. 5:25-cv-04785 and *Robinson v. Apple Inc.*, Case No. 3:25-
20 cv-04776 be consolidated with *Landsheft v. Apple Inc.*, Case No. 25-cv-02668-NW.
- 21 3. The separate docket numbers in *Feldt* and *Robinson* be terminated in accordance with the
22 regular procedures of this Court, and any pending schedules, deadlines, or dates in *Feldt*
23 and *Robinson* be vacated and the *Feldt* and *Robinson* cases be administratively closed.

1 DATED: July 7, 2025

COVINGTON & BURLING LLP

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3 By: /s/ Emily Johnson Henn

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12 DATED: July 7, 2025

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21 DATED: July 7, 2025

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ATTESTATION UNDER LOCAL RULE 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), the undersigned filer hereby attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: July 7, 2025

/s/ Emily Johnson Henn

Emily Johnson Henn

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

1. The Court finds that *Feldt v. Apple Inc.*, Case No. 5:25-cv-04785-NC and *Robinson v. Apple Inc.*, Case No. 3:25-cv-04776-VKD are related to the consolidated action *Landsheft v. Apple Inc.*, 5:25-cv-02668-NW.
2. *Feldt v. Apple Inc.*, Case No. 5:25-cv-04785 and *Robinson v. Apple Inc.*, Case No. 3:25-cv-04776 are consolidated with *Landsheft v. Apple Inc.*, Case No. 25-cv-02668-NW before the Honorable Noël Wise.
3. The separate docket numbers in *Feldt* and *Robinson* are terminated in accordance with the regular procedures of this Court, and any pending schedules, deadlines, or dates in *Feldt* and *Robinson* are vacated and the *Feldt* and *Robinson* cases are administratively closed.

DATED: July 8, 2025


HONORABLE NOËL WISE
UNITED STATES DISTRICT JUDGE