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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

DANIEL LERNER, individually, and on behalf of all others similarly situated,

Plaintiff,

v.

APPLE INC., and DOES 1–10, inclusive,

Defendants.

Case No. 2:26-cv-09676-GW-DTBx

STIPULATION OF DISMISSAL PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)(1)(A)(ii)

Judge: Hon. George H. Wu

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff Daniel Lerner and Defendant Apple Inc., through their undersigned counsel, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), that this action is dismissed with prejudice as to Plaintiff Daniel Lerner and without prejudice as to the putative class. No class has been certified in this action. Each party shall bear its own attorneys' fees and costs incurred in this action.

Respectfully submitted,

DATED: November 3, 2026

By: */s/ Todd M. Friedman*
Todd M. Friedman
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Attorneys for Plaintiff

DATED: November 3, 2026

By: */s/ Ashley Rogers*
Ashley Rogers
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Attorneys for Defendant Apple Inc.

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-4.3.4, I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: November 3, 2026

/s/ Todd M. Friedman
Todd M. Friedman

PROOF OF SERVICE

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, State of California, and not a party to the above-entitled cause. On November 4, 2026, I served a true copy of the Stipulation to Dismiss on all counsel of record via the ECF Filing System:

Executed on November 4, 2026.

[X] I hereby certify that I am a member of the Bar of the United States District Court, Central District of California.

[ ] I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

[X] I hereby certify under the penalty of perjury that the foregoing is true and correct.

By: /s/ Todd M. Friedman
Todd M. Friedman, Esq.
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

DANIEL LERNER, individually, and on behalf of all others similarly situated, Plaintiff, v. APPLE INC., and DOES 1–10, inclusive, Defendants.	Case No. 2:26-cv-09676-GW-DTBx **PROPOSED ORDER TO DISMISS WITH PREJUDICE AS TO PLAINTIFF AND WITHOUT PREJUDICE AS TO CLASS CLAIMS**

IT IS HEREBY ORDERED that pursuant to the Stipulation of the Parties, this matter is dismissed in its entirety with prejudice as to the named Plaintiff, and without prejudice as to the Putative Class alleged in the complaint, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Each party shall bear their own costs and attorneys' fees.

Dated this _____

_____
Honorable Judge George H. Wu