

1 *Counsel Listed in Signature Blocks*

2 UNITED STATES DISTRICT COURT
3 NORTHERN DISTRICT OF CALIFORNIA
4 OAKLAND DIVISION

5 GRADY HENDRIX & JENNIFER ROBERSON,
6 *Individual and Representative Plaintiffs,*

No. 4:25-cv-07558-YGR
No. 4:25-cv-08695-YGR
No. 4:25-cv-09090-YGR

7 v.

8 APPLE INC.,

**STIPULATION TO CONSOLIDATE CASES
AND SET BRIEFING SCHEDULE AND
[PROPOSED] ORDER**

9 *Defendant.*

Judge: Hon. Yvonne Gonzalez Rogers

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12 SUSANA MARTINEZ-CONDE, STEPHEN L.
MACKNIK,

13 *Individual and Representative Plaintiffs,*

14 v.

15 APPLE INC.,

16 *Defendant.*

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18 TASHA ALEXANDER, an Individual on Behalf
of Herself and All Others Similarly Situated,

19 *Plaintiff,*

20 v.

21 APPLE INC., a California Corporation, CRAIG
22 FEDERIGHI, an individual, and
23 JOHN GIANNANDREA, an individual,

24 *Defendants.*

1 6. Whereas, the initial case management conference in the *Hendrix* action is currently set
2 for December 15, 2025 at 2:00 pm, with the joint case management statement due by December 8,
3 2025.

4 7. Whereas, the parties agree that the designation of Interim Class Counsel and the filing
5 of a single operative consolidated complaint is necessary to ensure efficient case management.

6 NOW, THEREFORE, IT IS STIPULATED AND AGREED, subject to Court approval, as
7 follows:

8 1. The Parties stipulate, subject to this Court’s approval, that the three actions be
9 consolidated.

10 2. Defendants’ current deadlines to respond to the complaints in the three actions are held
11 in abeyance.

12 3. The December 15, 2025 case management conference scheduled in the *Hendrix*
13 Action, the January 26, 2026 case management conference scheduled in the *Martinez-Conde* Action,
14 and any related deadlines are vacated.

15 4. The *Hendrix* Plaintiffs, the *Alexander* Plaintiff and the *Martinez-Conde* Plaintiffs
16 propose that Plaintiffs’ counsel will file their applications for appointment of leadership no later than
17 November 21, 2025. The parties will file responses to these motions no later than December 5, 2025.

18 5. Within 14 days of their appointment, Interim Class Counsel shall designate or file and
19 serve a consolidated class action complaint.

20 6. Defendants shall have 45 days after designation or filing by Interim Class Counsel of
21 the consolidated complaint in which to answer, move to dismiss or otherwise respond.

22 7. If Defendants move to dismiss the consolidated complaint, plaintiff(s) shall respond to
23 the motion(s) to dismiss 45 days thereafter, and Defendants shall file their reply brief(s) 30 days after
24 that. All of the above may be revised with any schedule the Court deems appropriate.

25 8. Within 14 court days after all Defendants answer the consolidated complaint, the
26 parties shall meet and confer and file with the Court a proposed case scheduling order, including a
27 proposed case management conference.

RESPECTFULLY SUBMITTED this 13th day of November, 2025.

DATED this 13th day of November, 2025.

COTCHETT, PITRE & MCCARTHY, LLP

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By: /s/ Benjamin Gould

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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file **STIPULATION TO CONSOLIDATE CASES AND SET CONSOLIDATED CASE MANAGEMENT CONFERENCE AND [PROPOSED] ORDER**. Pursuant to Local Civil Rule 5-1(i)(3) regarding signatures, I, Anne K. Davis, attest that the other signatories have concurred in the filing of the document.

Dated: November 13, 2025

/s/ Anne K. Davis

Anne K. Davis

[PROPOSED] ORDER GRANTING STIPULATION

IT IS SO ORDERED.

Dated: _____

Hon. Yvonne Gonzalez Rogers
United States District Court Judge

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