

| No. | Date Submitted | Dispute | Court Order (6/8/21) |
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| 1.1 | 2/17/2021 | Plaintiffs' cross-motion to compel Rule 30(b)(6) deposition on topic of data logs and production of documents in advance (next deposition scheduled for June 11, 2021) | In preparation for the June 11 depo, Plaintiffs can identify 40 hyperlinks by 6/4 at noon – Google is to produce them by 6/8 at noon. If there are further issues re specific hyperlinks, the Court will address those in due course but will not order a mass production of hyperlinks because it would be beyond the scope and not proportional to the needs of the cases. |
| 1.2 | 4/20/2021 | Protective Order regarding Plaintiff devices and PI | |
| 1.3 | 4/20/2021 | Plaintiffs' RFP No. 5, request for data associated with Plaintiffs or their PI | <p>The Court continues to weigh how discovery may be completed efficiently and in a timely manner into the related issues of (1) what information Defendant has regarding Plaintiffs; and (2) what information Defendants have regarding identification of putative class members.</p> <p>First, the Court requests additional briefing on issue 1.3 following the 30(b)6 depositions currently scheduled in these cases on June 11 and June 16, respectively. Plaintiffs' brief in support of its motion to compel will be due Wednesday, June 23, 2021; Defendant's opposition will be due June 30, 2021. Briefs are not to exceed 10 pages. The parties may submit no more than 8 exhibits with a supporting declaration providing foundation and/or a brief explanation of the attachments; declarations are not to contain argument.</p> <p>Second, the Court is considering is the appointment of a special master under Rule 53 with sufficient technical expertise to assist the Court in evaluating the parties' arguments and responses on the foregoing issues in particular and, if necessary, on future discovery disputes. Neutrality of the special master would be required (Rule 53(a)(2)), and he/she would be selected following 2 nominations by each side, the parties meeting and conferring (as this may be an area where the proper candidate is obvious) and, if necessary, the Court making the selection. The Court will hear from the parties as to this approach, including any concerns set forth in Rule 53(a)(3), in a joint letter not to exceed 7 pages by June 18, 2021.</p> |
| 1.4 | 4/20/2021 | Plaintiffs' RFP Nos. 1 & 2, request for documents exchanged with regulators | Within 30 days from the date of this order, Google is to identify any additional public investigations regarding Google's collection of PI while users, of any type (e.g. synched, not synched; logged-in; logged- out), are using Chrome. If any such investigations are identified, the parties are to meet and confer regarding production of CIDs or subpoenas. |
| 1.5 | 4/20/2021 | Plaintiffs' RFP Nos. 3 & 4, request for documents exchanged in related litigation | |

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| 1.6 | 4/20/2021 | ESI Search Terms | <p>As to issues 1 & 2, the Parties are to report the status to the Court in their August joint discovery submission.</p> <p>First, however, it appears more direction from the Court on the addition of ESI search terms and perhaps custodians is needed. Accordingly, the parties are to provide: (1) a joint summary of the evolution of ESI search terms and custodians in this case, including any agreed upon protocol for adding custodians and terms thus far; (2) Plaintiffs'/ Defendant's proposals as to how to manage the addition of custodians and terms going forward, including proposed end-dates and caps for additional custodians or terms. The parties must meet and confer and make a good faith effort to reach agreement on a protocol.</p> <p>The foregoing is to be included in a joint letter submission not to exceed 5 pages by June 25, 2021.</p> <p>Though the search-term limitations in the April 13 order in <i>Brown</i> may be appropriate for other custodians, the order did not, either expressly or impliedly, cover all additional custodians for all time.</p> <p>Issue #3 will be deferred</p> <p>As discussed at the June 2 hearing, and clarified herein, productions from specific custodians must identify the custodian. Productions made pursuant to non-custodial searches need not be tied to specific RFPs.</p> <p>Issue #4 is addressed at 1.8.</p> |
| 1.7 | 4/20/2021 | ESI Custodians | |
| 1.8 | 4/20/2021 | Plaintiffs' RFP No. 8B (docs received or authored by officers and directors if related to data privacy) | In further clarification of the Court's prior order and for good cause shown, Google's search is to include the directors and officers of Google Inc., for the period January-October, 2015 and the Google LLC officers from 2015 to present. The search term is: <u>Chrome w/50 of privacy</u> . |
| 1.9 | 4/20/2021 | Plaintiffs' RFP Nos. 14 & 20 (certain draft docs; documents related to the "White Paper," see FAC ¶¶ 81-86 | |
| 1.10 | 4/20/2021 | Plaintiffs' RFP Nos. 9-13, 15, 17, 19, 21, 23-25. | |
| 2.1 | 2/17/2021 | Google's Motion for Protective Order Against Suspending Ordinary Log Retention Policies | |

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| 2.2 | 4/20/2021 | Timing of Named Plaintiffs' depositions. | If the parties have not resolved this dispute, then within 24 hours of this order , Plaintiffs are to provide one additional business day for the Kindler deposition on or before July 16, 2021. Within 24 hours of receipt of the date, Defendant will confirm the Kindler deposition either for July 5 or the new date. |
| 2.3 | 4/20/2021 | Plaintiffs' device preservation, as it relates to Google's Request for Production No. 1, production, and use of a review protocol. | |
| 2.4 | 4/20/2021 | Google's Requests for Production No. 2. | |
| 2.5 | 4/20/2021 | Google's Interrogatory No. 2. | |
| 2.6 | 4/20/2021 | Google's Interrogatory No. 4. | |
| 2.7 | 4/20/2021 | Google's Requests for Production Nos. 3 and 5. | Meet and confer to continue. |
| 2.8 | 4/20/2021 | Google's First Set of Requests for Admission Nos. 1a and 1b. | |
| 2.9 | 4/20/2021 | Google's Second Set of Requests for Admission Nos. 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, and 13 | The parties' submission on this issue is not helpful to the Court. The Court will set a date in the future for submission of disputes regarding written discovery. |

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| 2.10 | 4/20/2021 | Google's Second Set of Interrogatories Nos. 6, 7, 8, and 9. | The written responses are sufficient; Defendant can follow up at deposition. |
| 2.11 | 5/24/2021 | Plaintiffs' Amended Response to Google's First Set of Interrogatories No. 5. | No further written response required. At deposition Defendant can inquire as to the original response, Plaintiffs can make their objection on the record for the trial court to rule on at a later date. |