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16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN JOSE DIVISION

19 IN RE: GOOGLE LOCATION HISTORY  
LITIGATION

Case No. 5:18-cv-05062-EJD

20 **DECLARATION OF NOE**  
21 **GAMBOA IN SUPPORT OF**  
22 **MOTION FOR ATTORNEYS' FEES**  
23 **AND EXPENSES, AND FOR CLASS**  
24 **REPRESENTATIVE SERVICE**  
25 **AWARDS**

26 Dept: Courtroom 4 - 5th Floor  
27 Judge: Hon. Edward J. Davila  
28 Date: April 18, 2024  
Time: 9:00 A.M.

1 I, Noe Gamboa, declare as follows:

2 1. I am one of the class representatives in this case.

3 2. I submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees and  
4 Expenses, and for Class Representative Service Awards in the above-captioned case. I have  
5 personal knowledge of the facts stated herein. If called upon as a witness, I could and would  
6 competently testify as follows.

7 3. I am a competent adult over the age of eighteen years of age and a resident of Illinois.

8 4. I retained attorneys experienced in consumer class action litigation to represent me  
9 in this matter. At the outset of the case, I was informed of and understood my duties as a class  
10 representative, and believe that I have fulfilled these duties.

11 5. I have voluntarily and actively participated in this litigation, including by discussing  
12 the facts surrounding my own use of Google's services, and Google's representations to me about  
13 its collection of location information.

14 6. My attorneys regularly sought my assistance in prosecuting this lawsuit and  
15 negotiating a potential resolution of it.

16 7. I reviewed and approved the Amended Consolidated Class Action Complaint before  
17 it was filed and agreed to serve as a named plaintiff. When Google moved to dismiss that  
18 complaint, I kept in contact with my attorneys and was apprised of the status of the motion. I also  
19 reviewed and discussed with my attorneys the Court's order regarding Google's motion to dismiss.

20 8. I actively participated in discovery in this action. I reviewed and discussed with my  
21 attorneys the extensive and broad discovery served by Google in this case. Consistent with my  
22 discovery obligations, I preserved and conducted a diligent search for both hard copies and  
23 electronic copies of relevant documents and data, and provided my attorneys with the information  
24 they needed to prepare initial disclosures and written discovery responses. I participated in  
25 numerous meetings with my attorneys to prepare written responses to Google's discovery requests,  
26 turned my personal mobile devices over to my counsel and their forensic data experts, and provided  
27 personal data from my devices and accounts, despite my privacy concerns. I even addressed  
28 discovery inquiries that extended as far as family law disputes and criminal history.

1           9.       I kept in close contact with my attorneys to monitor the progress of the litigation.  
2 When the case went to mediation, my attorneys regularly updated me about the status of  
3 negotiations, and I made myself available in case I was needed.

4           10.       I have reviewed the Settlement Agreement and its exhibits. My attorneys and I  
5 reviewed and discussed the core terms of the Settlement, and they answered all of my questions. I  
6 conducted a final review of the Settlement Agreement, understood and fully agreed to the terms of  
7 the proposed settlement, and later on signed it.

8           11.       To the best of my recollection, the approximate time spent on these activities was  
9 approximately 60 hours over the course of many months. I believe this is a conservative estimate.

10          12.       I believe the monetary and injunctive relief provided by the settlement represent a  
11 fair resolution of my claims against Google. I approve and support the Settlement Agreement  
12 because I believe that it is fair, reasonable, and in the best interests of the class, and obtaining this  
13 relief now is preferable to continuing this litigation with an uncertain outcome.

14          13.       While I did not undertake any direct financial risks in pursuing this action, I  
15 understood that, by stepping forward as a named plaintiff in this case, I took certain risks, and that  
16 the case was likely to generate some publicity and be associated with my name in the future. I also  
17 was aware that stepping forward as a plaintiff in this lawsuit may have a negative impact on certain  
18 aspects of my life. Despite these risks, I decided to pursue this case because I felt it was more  
19 important to vindicate the rights of millions of consumers who used mobile devices and whose  
20 Location Information was stored by Google while ‘Location History’ was disabled.

21          14.       I have never been promised any compensation for performing my duties as a plaintiff  
22 and a class representative, including any service award, and am aware of no interest of mine in this  
23 litigation that conflicts with those of other class members.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is true and  
2 correct. Executed on this 25th day of January 2024, in Oak Lawn, Illinois.

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