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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 MICHAEL**  
 21 **CHILDS IN SUPPORT OF MOTION**  
 22 **FOR ATTORNEYS' FEES AND**  
 23 **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, Michael Childs, 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  
8 California.

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

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

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

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

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

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

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

10 11. To the best of my recollection, the approximate time spent on these activities was  
11 approximately 50 hours over the course of many months. I believe this is a conservative estimate.

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

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

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

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this \_\_ day of January 2024, in Boca Raton, Florida.

1/24/2024

DocuSigned by:  
*Michael Childs*  
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Michael Childs