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18 UNITED STATES DISTRICT COURT  
 19 NORTHERN DISTRICT OF CALIFORNIA  
 20 SAN JOSE DIVISION

21 IN RE: GOOGLE LOCATION HISTORY  
 LITIGATION

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

22 **EXHIBIT A TO MOTION FOR FINAL**  
 23 **APPROVAL OF CLASS ACTION**  
 24 **SETTLEMENT – JOINT CY PRES**  
 25 **ALLOCATION PROPOSAL**

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

1 In accordance with Paragraph 41.3 of the Settlement Agreement, the Parties identify for the  
 2 Court the following proposed percentages of the Net Settlement Fund to be distributed to each  
 3 Proposed Cy Pres Recipient:

<b>Organization Name</b>	<b>Joint Proposal</b>	<b>Estimated Award<sup>1</sup></b>
Berkman Klein Center for Internet & Society at Harvard	4%	\$1,500,000
MIT Internet Policy Research Initiative	4%	\$1,500,000
New York University's Information Law Institute	1%	\$404,790
Yale Law School's Information Society Project	4%	\$1,500,000
Fordham University Center on Law and Information Policy	2%	\$800,000
Center on Privacy & Technology at Georgetown Law	4%	\$1,500,000
UCLA Institute for Technology, Law & Policy	4%	\$1,500,000
The Markup	7%	\$3,000,000
Internet Archive	5%	\$2,000,000
ACLU Speech, Privacy, and Technology Project	14%	\$6,000,000
ACLU of N. Cal. Tech. & Civil Liberties Program	4%	\$1,800,000
Center for Democracy & Technology	6%	\$2,500,000
ConnectSafely	1%	\$350,000
Electronic Frontier Foundation	14%	\$6,000,000
FPF Education & Innovation Foundation	4%	\$1,500,000
Free Press	4%	\$1,500,000
Privacy Rights Clearinghouse	1%	\$350,000
Data & Society Research Institute	4%	\$1,500,000
National Cybersecurity Alliance	1%	\$350,000
Electronic Privacy Information Center (EPIC)	4%	\$1,500,000
Rose Foundation	13%	\$5,589,243
<b>Total:</b>	<b>100%</b>	<b>\$42,644,033</b>

25 <sup>1</sup> The Parties' joint proposal is presented in terms of a percentage of the Net Settlement Fund to  
 26 be awarded to each recipient because the Parties cannot know the total amount of the Net  
 27 Settlement Fund to be distributed until the Court rules on Plaintiffs request for attorneys' fees,  
 28 litigation expenses, service awards, and settlement-administrator expenses. The estimated awards  
 listed here assume that the Court will grant Plaintiffs' requests in the exact amounts requested,  
 and are offered for illustrative purposes only.

1 Dated: March 25, 2024

Respectfully submitted,

2  
3 By: /s/ Tina Wolfson

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13 Dated: March 25, 2024

14 By: /s/ Michael W. Sobol

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