

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

A court authorized this Notice. This is not a solicitation from a lawyer.

If you bought a MacBook laptop sold between 2015 and 2019 equipped with a “Butterfly” keyboard, you may be eligible for payment from a class action settlement

- A settlement has been reached with Apple Inc. (“Apple”) in a class action law lawsuit alleging that certain MacBook laptops sold between 2015-2019 were equipped with defective butterfly keyboards that can result in characters repeating unexpectedly; letters or characters not appearing; and/or the keys feeling “sticky” or not responding in a consistent manner. Apple denies all allegations of wrongdoing. The Settlement provides for a \$50 million fund for payments to Settlement Class Members who had the “Butterfly” keyboard on their MacBook laptop repaired, as described in this Notice.
- The two repair procedures covered by the Settlement are: (1) a Topcase Replacement, which involves replacing the entire keyboard module; and (2) a Keycap Replacement, which involves replacement of one or more keycaps.
- If Apple’s records reflect you received two Topcase Replacements, you are a **Group 1** Settlement Class Member and are eligible to receive payment without the need to submit a claim.
- If you received a single Topcase Replacement or one or more Keycap Replacements, and you declare that the repair did not resolve your keyboard issues, you are a **Group 2** or **Group 3** Settlement Class Member and must submit a claim to get a payment from the Settlement.
- The amount of the settlement payment varies depending on whether you are a Group 1, Group 2, or Group 3 Settlement Class Member. Please see the information in this Notice concerning payments.
- Visit www.KeyboardSettlement.com to make a claim. **Use your Unique ID and PIN when making a claim.** You can find your Unique ID and PIN on the email or postcard you received notifying you about the Settlement.
- You can also opt out of or object to the Settlement.
- Your rights are affected whether you act or don’t act. Please read this Notice carefully.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
<u>GROUP 1 SETTLEMENT CLASS MEMBERS:</u> OBTAINED AT LEAST TWO TOPCASE REPLACEMENTS FROM APPLE OR AN AUTHORIZED SERVICE PROVIDER WITHIN FOUR YEARS OF PURCHASE	Settlement Class Members in Group 1 will receive an email or postcard notifying them that they are eligible for and will receive an automatic payment. Group 1 Settlement Class Members should confirm or update the mailing address for their check by visiting www.KeyboardSettlement.com . By receiving a payment, Group 1 Settlement Class Members will give up rights and be bound by the Settlement.	March 6, 2023

QUESTIONS? CALL 1-855-579-1311 OR VISIT WWW.KEYBOARDSETTLEMENT.COM

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS		DEADLINE
<p><u>GROUP 2 SETTLEMENT CLASS MEMBERS:</u></p> <p>OBTAINED A SINGLE TOPCASE REPLACEMENT FROM APPLE OR AN AUTHORIZED SERVICE PROVIDER WITHIN FOUR YEARS OF PURCHASE, AND THE REPAIR DID NOT RESOLVE THE KEYBOARD ISSUES</p>	<p>Submit a claim form declaring that the single Topcase repair did not resolve the issues with the keyboard. If Apple does not have a record of your purchase or repair, additional proof may be required.</p> <p>This is the only way to get a payment.</p> <p>By receiving a payment, Group 2 Settlement Class Members will give up rights and be bound by the Settlement.</p>	<p>March 6, 2023</p>
<p><u>GROUP 3 SETTLEMENT CLASS MEMBERS:</u></p> <p>OBTAINED ONE OR MORE KEYCAP REPLACEMENTS FROM APPLE OR AN AUTHORIZED SERVICE PROVIDER WITHIN FOUR YEARS OF PURCHASE, AND THE REPAIR(S) DID NOT RESOLVE THE KEYBOARD ISSUES</p>	<p>Submit a claim form, declaring that the keycap repair(s) did not resolve the issues with the keyboard. If Apple does not have a record of your purchase or repair, additional proof may be required.</p> <p>This is the only way to get a payment.</p> <p>By receiving a payment, Group 2 Settlement Class Members will give up rights and be bound by the Settlement.</p>	<p>March 6, 2023</p>
<p>EXCLUDE YOURSELF</p>	<p>Get no payment.</p> <p>This is the only option that allows you to keep your right to bring any other claim against Apple related to the subject matter of the claims in this case.</p>	<p>February 10, 2023</p>
<p>COMMENT ON OR OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</p>	<p>You can write to the Court about why you like or do not like the Settlement.</p> <p>You cannot ask the Court to order a larger settlement.</p> <p>You can also ask to speak to the Court at the hearing on March 16, 2023 about the fairness of the Settlement, with or without your own attorney.</p>	<p>February 10, 2023</p>
<p>DO NOTHING</p>	<p>Get no payment (unless you are a Group 1 Class Member).</p> <p>Give up rights and be bound by the Settlement.</p>	<p>No Deadline</p>

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved.

QUESTIONS? CALL 1-855-579-1311 OR VISIT WWW.KEYBOARDSETTLEMENT.COM

WHAT THIS NOTICE CONTAINS

Basic Information	4
1. Why did I get this Notice?.....	4
2. What is this lawsuit about?.....	4
3. What is a class action?.....	4
4. Why is there a Settlement?	4
Who is in the Settlement	4
5. Who is in the Settlement?.....	4
6. What should I do if I am still not sure whether I am included?.....	5
The Settlement Benefits	5
7. What does the Settlement provide?	5
8. Who can get money from the Settlement, and how much?	6
9. How do I know if I received a Topcase Replacement or Keycap Replacement when I had my MacBook serviced by Apple or an authorized service provider?	7
10. Am I eligible to recover payments made to unauthorized third party repair providers or other out-of-pocket expenses?	7
11. What am I giving up if I stay in the Class?	7
How to Get a Payment—Making a Claim	7
12. How can I get a payment?	7
13. What is the deadline for submitting a claim form?.....	8
14. When will I get my payment?	8
15. How can I verify or update my mailing address?	8
The Lawyers Representing The Class	8
16. Do I have a lawyer in the case?	8
17. Should I get my own lawyer?	8
18. How will the lawyers be paid?	9
Excluding Yourself from the Settlement	9
19. How do I get out of the Settlement?.....	9
20. If I don't opt out, can I sue Apple for the same thing later?.....	9
21. What happens if I opt out?.....	9
Objecting to the Settlement	9
22. How do I tell the Court if I don't like the Settlement?	9
23. What's the difference between objecting and excluding?	10
The Court's Final Approval Hearing	11
24. When and where will the Court decide whether to approve the Settlement?	11
25. Do I have to come to the Final Approval Hearing?.....	11
26. May I speak at the hearing?.....	11
If I Do Nothing	11
27. What happens if I do nothing at all?.....	11
Getting More Information	12
28. Are more details about the Settlement available?.....	12
29. How do I get more information?	12

QUESTIONS? CALL 1-855-579-1311 OR VISIT WWW.KEYBOARDSETTLEMENT.COM

BASIC INFORMATION

1. Why did I get this Notice?

A court authorized this Notice because individuals or entities who bought Apple MacBook, MacBook Air, and MacBook Pro MacBook laptops between 2015 and 2019 that were equipped with a butterfly keyboard mechanism have the right to know about a legal settlement. If you qualify as a Settlement Class Member and you received a qualifying repair, you can get a payment.

To find out if you qualify, see Questions 5-6 below.

This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

Judge Edward J. Davila of the United States District Court for the Northern District of California is in charge of this case. The case is *In re MacBook Keyboard Litigation*, No. 5:18-cv-02813-EJD (N.D. Cal.). The proposed Settlement also resolves a related case called *Huey v. Apple*, No. 2018-CA-004200-B, pending in the Superior Court of the District of Columbia.

2. What is this lawsuit about?

Plaintiffs claim that Defendant sold MacBook laptops with butterfly keyboards that are defective. Plaintiffs allege that purchasers have experienced the following keyboard issues as a result of this alleged defect:

- Letters or characters repeat unexpectedly;
- Letters or characters do not appear; and
- Key(s) feel “sticky” or do not respond in a consistent manner.

Apple denies all of the allegations made in the lawsuit, denies that any MacBooks are defective, and denies that Apple did anything improper or unlawful. Apple asserts numerous defenses to the claims in this case. The proposed settlement to resolve this case is not an admission of guilt or wrongdoing of any kind by Apple.

3. What is a class action?

In a class action, one or more individuals and/or entities called “class representatives” sue on behalf of themselves and other individuals and/or entities who have similar claims. This group of individuals and/or entities is called the “class,” and the individuals and/or entities in the class are called “class members.” One court resolves the issues for all class members, except for people who exclude themselves from the class.

4. Why is there a Settlement?

The Court did not decide in favor of the Plaintiffs or the Defendant. Instead, both sides agreed to a Settlement. That way, they avoid the costs and risks of a trial, and the allegedly affected Settlement Class Members can get benefits or compensation. The class representatives and their attorneys think the Settlement is best for the Class.

WHO IS IN THE SETTLEMENT

5. Who is in the Settlement?

The Settlement Class includes all persons and entities in the United States who purchased, other than for resale, one or more of the following Apple MacBook models:

QUESTIONS? CALL 1-855-579-1311 OR VISIT WWW.KEYBOARDSETTLEMENT.COM

- MacBook (Retina, 12-inch, Early 2015)
- MacBook (Retina, 12-inch, Early 2016)
- MacBook (Retina, 12-inch, 2017)
- MacBook Air (Retina, 13-inch, 2018)
- MacBook Air (Retina, 13-inch, 2019)
- MacBook Pro (13-inch, 2016, Two Thunderbolt 3 Ports)
- MacBook Pro (13-inch, 2017, Two Thunderbolt 3 Ports)
- MacBook Pro (13-inch, 2019, Two Thunderbolt 3 Ports)
- MacBook Pro (13-inch, 2016, Four Thunderbolt 3 Ports)
- MacBook Pro (13-inch, 2017, Four Thunderbolt 3 Ports)
- MacBook Pro (15-inch, 2016)
- MacBook Pro (15-inch, 2017)
- MacBook Pro (13-inch, 2018, Four Thunderbolt 3 Ports)
- MacBook Pro (15-inch, 2018)
- MacBook Pro (13-inch, 2019, Four Thunderbolt 3 Ports)
- MacBook Pro (15-inch, 2019)

Together, these models are referred to as the “Class Computers” in this Notice.

The Settlement Class includes all purchasers, including individuals, corporations, and other entities. It does not include any entity in which Apple has a controlling interest; Apple’s directors, officers and employees; Apple’s legal representatives, successors, and assigns; members of the Court; and all persons who submit valid requests to be excluded from the Settlement.

6. What should I do if I am still not sure whether I am included?

If you are not sure whether you are included in the Settlement Class, you can ask for free help by calling the Claims Administrator at 1-855-579-1311 for more information. You can also visit www.KeyboardSettlement.com.

You can also quickly determine the make/model of your MacBook by selecting “About This Mac” under the Apple menu in the top left portion of the screen, or by entering the serial number from the bottom of the MacBook into this page on Apple's website: <https://checkcoverage.apple.com/>.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

Apple will pay \$50 million into a Settlement Fund. After deduction of the costs of notice and settlement administration, any award of attorneys’ fees (up to 30% of the Settlement Fund), litigation costs, and any service awards for the Class Representatives (up to \$5,000 to each of the twelve individual Class Representatives), the Settlement Fund will be distributed to Settlement Class Members in accordance with a plan of allocation that accounts for the number of eligible Settlement Class Members in each of the three Settlement categories. The plan of allocation is described in detail in the Settlement Agreement available at www.KeyboardSettlement.com.

The amount of the payments for each Group will vary depending on the number of valid claims received. Group 1 Settlement Class Members are estimated to receive a payment between \$300 and \$395. Eligible Group 2 Settlement Class Members are estimated to receive up to \$125 and eligible Group 3 Settlement Class

QUESTIONS? CALL 1-855-579-1311 OR VISIT WWW.KEYBOARDSETTLEMENT.COM

Members are estimated to receive up to \$50. In addition, Apple's Keyboard Service Program (<https://support.apple.com/keyboard-service-program-for-mac-notebooks>) provides four years of protection and remains available for any Settlement Class Member who may experience future issues within four years of purchase.

We will not know the final amounts that each group will receive until all claims are evaluated. Please be patient.

8. Who can get money from the Settlement, and how much?

The amount Settlement Class Members will receive (and what they must do to get a payment) depends on which of the three categories they fall into and how many eligible Settlement Class Members are ultimately determined to fall into each category.

Group 1: Multiple Topcase Replacements. Settlement Class Members who, within four years of purchasing a Class Computer, obtained two or more Topcase Replacements, will receive a payment without the need to submit a claim form. Settlement Class Members in this group will receive an email or postcard Notice confirming eligibility for payment and requesting confirmation of contact information. It is estimated that Settlement Class Members in this group will receive an initial payment of \$300, but the actual payment could be more or less, depending on the number of eligible Settlement Class Members in each category. The maximum payment for Group 1 Settlement Class Members is \$395. A Settlement Class Member can meet the eligibility requirements for this group and receive payment if they obtain two or more Topcase Replacements anytime until November 28, 2024.

Group 2: Single Topcase Replacement. Settlement Class Members who, within four years of purchasing a Class Computer, obtained a single Topcase Replacement, must submit a claim to receive payment. Settlement Class Members in this Group must declare on the claim form that the repair did not resolve their keyboard issues. Settlement Class Members who obtained a single Topcase Replacement must submit a claim form by March 6, 2023. Settlement Class Members whose purchase or repair is not reflected in Apple's records will also need to provide proof of purchase and/or repair, as explained in the Claim Form. You can fill out and upload the claim form at www.KeyboardSettlement.com. The maximum payment for Group 2 Settlement Class Members is \$125, but it may be less. The amount of the payments for Group 2 Settlement Class Members will depend on the number of eligible Settlement Class Members and valid claims for all categories.

Group 3: Keycap Replacements. Settlement Class Members who, within four years of purchasing a Class Computer, obtained one or more Keycap Replacements, must submit a claim to receive payment. Settlement Class Members in this Group must declare on the claim form that the repair did not resolve their keyboard issues. Settlement Class Members who obtained Keycap Replacements must submit a claim form by March 6, 2023. Settlement Class Members whose purchase or repair is not reflected in Apple's records will also need to provide proof of purchase and/or repair, as explained in the Claim Form. You can fill out and upload the claim form at www.KeyboardSettlement.com. The maximum payment for Group 3 Settlement Class Members is \$50, but it may be less. The amount of the payments for Group 3 Settlement Class Members will depend on the number of eligible Settlement Class Members and valid claims for all categories.

For more information on the plan of allocation, go to www.KeyboardSettlement.com.

If you own a Class Computer and did not obtain a Keycap Replacement or Topcase Replacement within the first four years of ownership, you are not eligible for payment. Apple's Keyboard Service Program (<https://support.apple.com/keyboard-service-program-for-mac-notebooks>) provides four years of protection and remains available for any Class Member who may experience future issues within four years of purchase.

QUESTIONS? CALL 1-855-579-1311 OR VISIT WWW.KEYBOARDSETTLEMENT.COM

For information on how to make a claim, see Question 12 and www.KeyboardSettlement.com.

9. How do I know if I received a Topcase Replacement or Keycap Replacement when I had my MacBook serviced by Apple or an authorized service provider?

If you received a record of the repair from Apple or an Apple Authorized Service Provider, it will specify whether you received a Topcase Replacement or a Keycap Replacement.

A Topcase Replacement refers to the replacement of the full keyboard module (including the battery, track pad, speakers, top case, and keyboard), performed by Apple or an Apple Authorized Service Provider.

A Keycap Replacement refers to the replacement of one or more keycaps on a keyboard, performed by Apple or an Apple Authorized Service Provider, and does not involve replacement of the full keyboard module.

If you are still unsure whether you received a Topcase Replacement or Keycap Replacement, you can call the Claims Administrator at 1-855-579-1311 for more information.

10. Am I eligible to recover payments made to unauthorized third party repair providers or other out-of-pocket expenses?

No. Settlement payments are only available to Settlement Class Members who received repairs performed by Apple or an Apple Authorized Service Provider. The Settlement does not provide reimbursement for any other out of pocket expenses.

11. What am I giving up if I stay in the Class?

Unless you exclude yourself with an opt-out request (*see* Question 19), you cannot sue, continue to sue, or be part of any other lawsuit against Apple about the issues in this case. The “Releases” section in the Settlement Agreement describes the legal claims that you give up if you remain a Settlement Class Member. The Settlement Agreement can be viewed at www.KeyboardSettlement.com.

HOW TO GET A PAYMENT—MAKING A CLAIM

12. How can I get a payment?

Settlement Class Members in Group 1 (multiple Topcase Replacements) will receive a payment without the need to submit claim if the Settlement is approved by the Court and becomes effective.

If you are a Settlement Class Member in Group 2 or 3 (single Topcase Replacement and Keycap Replacements, respectively) you can make a claim at www.KeyboardSettlement.com. You can also contact the Claims Administrator to request a paper claim form by telephone at 1-855-579-1311 or by U.S. mail at MacBook Keyboard Settlement, c/o JND Legal Administration, PO Box 91341, Seattle, WA 98111, and submit the claim form to the same U.S. mail address or email it to info@KeyboardSettlement.com. Each MacBook may be the subject of only one claim. Settlement Class Members who purchased multiple Class Computers may submit a separate claim for each MacBook they purchased.

If you appear in Apple’s records as having received multiple Topcase Replacements, you will receive a summary notice via email or postcard stating that you are a Group 1 Settlement Class Member. If you appear in Apple’s records as having received a single Topcase Replacement or Keycap Replacement, you will receive an email or postcard with a Unique ID and PIN that you can use to pre-populate an online

QUESTIONS? CALL 1-855-579-1311 OR VISIT WWW.KEYBOARDSETTLEMENT.COM

claim form. If you do not appear in Apple's records as having received a Topcase Replacement or Keycap Replacement, you will need to provide additional information, including supporting your claim with reasonable documentation and/or information that you received a Topcase Replacement or Keycap Replacement. If you do not appear in Apple's records as having purchased a Class Computer, you will also need to provide a serial number for your device, or provide additional documentation or information showing that you purchased a Class Computer. The Claim Form and instructions will explain the information that is required and the acceptable forms of documentation or information for proof of repair and/or purchase.

13. What is the deadline for submitting a claim form?

For Settlement Class Members not in Group 1 who obtained a single Topcase Replacement or one or more Keycap Replacements, claim forms must be submitted electronically or postmarked no later than **March 6, 2023**.

14. When will I get my payment?

The Court will hold a hearing on **March 16, 2023 at 9:00 a.m.**, to decide whether to approve the Settlement. The Court may move the Final Approval Hearing to a different date or time without providing further Notice to the Class. The date and time of the Final Approval Hearing can be confirmed at www.KeyboardSettlement.com. If the Settlement is approved, there may be appeals. The appeal process can take time. If there is no appeal, your settlement benefit will be processed promptly. Please be patient.

Updates regarding the Settlement and when payments will be made will be posted at www.KeyboardSettlement.com.

15. How can I verify or update my mailing address?

All Settlement Class Members can update their mailing address or other contact information by visiting www.KeyboardSettlement.com or emailing info@KeyboardSettlement.com.

THE LAWYERS REPRESENTING THE CLASS

16. Do I have a lawyer in the case?

Yes. The Court appointed the law firms of Girard Sharp LLP and Chimicles Schwartz Kriner & Donaldson-Smith LLP to represent you and the other Class Members. These firms are called Class Counsel. You will not be charged for their services.

17. Should I get my own lawyer?

You do not need to hire your own lawyer, as Class Counsel is working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer's services. For example, you can ask your own lawyer to appear in court if you want someone other than Class Counsel to speak for you. You may also appear for yourself without a lawyer.

18. How will the lawyers be paid?

Class Counsel will ask the Court for an award of attorneys' fees of up to 30% of the Settlement Fund, litigation expenses, and service awards to the Class Representatives of up to \$5,000 each. The Court will determine these amounts. All of these amounts, as well as the costs associated with notice and administering the settlement, will be paid from the Settlement Fund.

A copy of Class Counsel's Motion for Attorneys' Fees and Expenses and for Named Plaintiff Service Awards will be available at www.KeyboardSettlement.com by January 6, 2023.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you don't want a payment from the Settlement and you want to keep your right, if any, to sue Apple on your own about the legal issues in this case, then you must take steps to get out of the Settlement. This is called excluding yourself from—or "opting out" of—the Settlement Class.

19. How do I get out of the Settlement?

You may opt out online by **February 10, 2023** at www.KeyboardSettlement.com. Click on the "Opt Out" tab and provide the requested information. You may also opt out by mailing the Opt-Out form (available at www.KeyboardSettlement.com or by calling 1-855-579-1311) to the Claims Administrator at

In re MacBook Keyboard Litigation Settlement
c/o JND Legal Administration
P.O. Box 91341
Seattle, WA 98111

Opt-out requests must be submitted electronically or postmarked no later than **February 10, 2023**.

20. If I don't opt out, can I sue Apple for the same thing later?

No. Unless you opt out, you give up the right to bring any other claim against Apple related to the subject matter of the claims in this case. You must exclude yourself from the Class if you want to try to pursue your own lawsuit.

21. What happens if I opt out?

If you opt out of the Settlement, you will not have any rights as a member of the Settlement Class under the Settlement; you will not receive any payment as part of the Settlement; you will not be bound by any further orders or judgments in this case; and you will keep the right, if any, to sue on any claims against Apple related to the subject matter of the claims in this case at your own expense.

OBJECTING TO THE SETTLEMENT

22. How do I tell the Court if I don't like the Settlement?

If you are a Settlement Class Member and do not opt out of the Settlement, you can ask the Court to deny approval of the Settlement by filing an objection. You can also object to the requested award of attorneys' fees and expenses to Class Counsel or service awards to the Class Representatives. The Court will consider your views. You can't ask the Court to order a different settlement; the Court can only approve or reject

QUESTIONS? CALL 1-855-579-1311 OR VISIT WWW.KEYBOARDSETTLEMENT.COM

the Settlement. If the Court denies approval, no settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object.

Any objection to the proposed Settlement must be in writing. If you file a timely written objection, you may (but are not required to) appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

To object, you must file a document with the Court saying that you object to the proposed Settlement in *In re MacBook Keyboard Litigation*, No. 5:18-cv-02813-EJD (N.D. Cal.). Be sure to include:

- Your full name, mailing address, telephone number, email address, and signature. If you are represented by counsel, you must include your counsel's name, mailing address, email address, and telephone number;
- Proof of membership in the Settlement Class;
- A detailed statement of your objection, including all the grounds for the objection together with any evidence you think supports it;
- A statement whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class;
- A statement whether you or your counsel intends to speak at the Final Approval Hearing; and
- A list of all cases in which you or your counsel (if you have counsel) has filed an objection to a class action settlement within the past five years.

You can file the objection electronically at <https://www.cand.uscourts.gov/cm-ecf> or mail the objection by First Class U.S. Mail, so that it is submitted electronically or postmarked no later than **February 10, 2023**, to the following address:

Clerk of the Court
U.S. District Court for the
Northern District of California
280 South 1st Street
San Jose, CA 95113
Case No. 5:18-cv-02813-EJD

If you do not mail or electronically file the objection, you must have it delivered in person to the above boxed address, no later than **February 10, 2023**.

23. What's the difference between objecting and excluding?

Objecting is telling the Court that you don't like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and telling the Court that you don't want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because it no longer affects you. You cannot both opt out and object to the Settlement.

THE COURT'S FINAL APPROVAL HEARING

24. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing on **March 16, 2023 at 9:00 a.m.**, in Courtroom 4 of the San Jose federal courthouse, located at 280 South 1st Street, San Jose, CA 95113.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to Settlement Class Members who have asked to speak at the hearing.

The Court may also decide how much Class Counsel should receive in fees and expense reimbursements. After the hearing, the Court will decide whether to approve the Settlement.

The Court may reschedule the Final Approval Hearing, or hold the hearing via Zoom Webinar, or change any of the deadlines described in this Notice. The date of the Final Approval Hearing may change without further notice to Class Members. Be sure to check the website, www.KeyboardSettlement.com, for news of any such changes. You can also access the case docket via the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>.

25. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you send an objection, you do not have to come to the hearing to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but that is not necessary.

26. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must include a statement in your written objection (see Question 22) that you intend to appear at the hearing. Be sure to include your name, address, and signature as well.

You cannot speak at the hearing if you exclude yourself from the Class.

IF I DO NOTHING

27. What happens if I do nothing at all?

If you are a Settlement Class Member in Group 1 (multiple Topcase Replacements) and you do not exclude yourself from the Settlement, you will be mailed a payment. Please go to www.KeyboardSettlement.com or call the Claims Administrator at 1-855-579-1311 to verify or update your contact information.

If you are a Settlement Class Member in Groups 2 or 3 (Single Topcase Replacement and Keycap Replacements, respectively), you must submit a valid claim form to get a payment. If you do nothing, you'll be a Settlement Class Member and you'll get no money from this Settlement.

If you are a Settlement Class Member in any group and you do not exclude yourself as explained in Question 19, you will give up your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Apple related to the subject matter of this lawsuit or for any claims released by the Settlement Agreement.

QUESTIONS? CALL 1-855-579-1311 OR VISIT WWW.KEYBOARDSETTLEMENT.COM

GETTING MORE INFORMATION

28. Are more details about the Settlement available?

Yes. This Notice summarizes the proposed Settlement—more details are in the Settlement Agreement and other case documents. You can get a copy of these and other documents at www.KeyboardSettlement.com, by contacting Class Counsel at KeyboardSettlement@girardsharp.com or KeyboardSettlement@chimicles.com, by accessing the docket in this case through the Court’s Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California at any of the Court’s locations between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays:

- Robert F. Peckham Federal Building and United States Courthouse, 280 South 1st Street, San Jose, CA 95113
- Phillip Burton Federal Building & United States Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102
- Ronald V. Dellums Federal Building & United States Courthouse, 1301 Clay Street, Oakland, CA 94612
- United States Courthouse, 3140 Boeing Avenue, McKinleyville, CA 95519

PLEASE DO NOT CALL THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

29. How do I get more information?

The website, www.KeyboardSettlement.com, has the claim form, answers to questions about the Settlement, and other information to help you determine whether you are eligible for a payment.

You can also call the Claims Administrator at 1-855-579-1311 or write to them at:

In re MacBook Keyboard Litigation Settlement
c/o JND Legal Administration
P.O. Box 91341
Seattle, WA 98111

Class Counsel can be reached using the following contact information:

- **Simon S. Grille.** Telephone: (415) 981-4800; email: KeyboardSettlement@girardsharp.com
- **Steve Schwartz.** Telephone: (610) 642-8500; email: KeyboardSettlement@chimicles.com

QUESTIONS? CALL 1-855-579-1311 OR VISIT WWW.KEYBOARDSETTLEMENT.COM