

1 MORGAN & MORGAN
2 COMPLEX LITIGATION GROUP
3 John A. Yanchunis (Admitted *Pro Hac Vice*)
201 N. Franklin Street, 7th Floor
4 Tampa, FL 33602
Telephone: 813/223-5505
5 jyanchunis@ForThePeople.com

TADLER LAW LLP
Ariana J. Tadler (Admitted *Pro Hac Vice*)
One Pennsylvania Plaza, 36th Floor
New York, NY 10119
Telephone: 212/946-9300
6 atadler@tadlerlaw.com

7 ROBBINS GELLER RUDMAN
& DOWD LLP
8 Stuart A. Davidson (Admitted *Pro Hac Vice*)
120 East Palmetto Park Road, Suite 500
9 Boca Raton, FL 33432
Telephone: 561/750-3000
sdavidson@rgrdlaw.com

LOCKRIDGE GRINDAL NAUEN P.L.L.P.
Karen Hanson Riebel (Admitted *Pro Hac Vice*)
100 Washington Ave. South, Suite 2200
Minneapolis, MN 55401
Telephone: 612/339-6900
khriebel@locklaw.com

10 CASEY GERRY SCHENK FRANCAVILLA
BLATT & PENFIELD LLP
11 Gayle M. Blatt (122048)
110 Laurel Street
12 San Diego, CA 92101
Telephone: 619/238-1811
13 gmb@cglaw.com

ROBINSON CALCAGNIE, INC.
Daniel S. Robinson (244245)
19 Corporate Plaza Dr.
Newport Beach, CA 92660
Telephone: 949/720-1288
949/720-1292
drobinson@robinsonfirm.com

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15 *Attorneys for Plaintiffs and Settlement Class Counsel*

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION**

18 IN RE: YAHOO! INC. CUSTOMER DATA)
19 SECURITY BREACH LITIGATION)

No. 16-md-02752-LHK

20 **PLAINTIFFS' MOTION FOR FINAL**
21 **APPROVAL OF CLASS ACTION**
22 **SETTLEMENT**

23 Date: April 2, 2020
24 Time: 1:30 p.m.
25 Courtroom: 8, 4th Floor
26 Judge: Hon. Lucy H. Koh

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1 PLEASE TAKE NOTICE THAT Plaintiffs move the Court to grant Plaintiffs' Motion for
2 Final Approval.

3 Plaintiffs respectfully request that the Court finally approve the Settlement and that the
4 Court enter an Order that:

5 (1) Finally approves the Amended Settlement Agreement and Release (ECF No. 396-
6 2);

7 (2) Finally certifies the following Settlement Class under Fed. R. Civ. P. 23(b)(2) and
8 (b)(3):

9 All U.S. and Israel residents and small businesses with Yahoo
10 accounts at any time during the period of January 1, 2012 through
11 December 31, 2016, inclusive; provided, however, that the
12 following are excluded from the Settlement Class: (i) Defendants,
13 Defendants' officers, directors, legal representatives, successors,
14 subsidiaries, and assigns; (iv) any judge, justice, or judicial officer
15 presiding over this matter and the members of their immediate
16 families and judicial staff; and (v) any individual who timely and
validly opts-out from the Settlement Class.

17 (3) Finally appoints as Class Representatives: John Bell, Michelle Bouras, Jana
18 Brabcova, Reid Bracken, Paul Dugas, Hashmatullah Essar, Hilary Gamache, Mali
19 Granot, Kimberly Heines, Andrew J. Mortensen, Brian Neff, Jared Pastor, Brendan
20 Quinn, Deana Ridolfo, Matthew Ridolfo, and Yaniv Rivlin;

21 (4) Finally appoints as Class Counsel:

22 a. Lead Class Counsel: John Yanchunis of Morgan & Morgan Complex
23 Litigation Group;

24 b. Executive Class Counsel: Ariana Tadler of Milberg Tadler Phillips
25 Grossman LLP, Stuart Davidson of Robins Geller Rudman & Dowd LLP,
26 Gayle Blatt of Casey Gerry Schenk Francavilla Blatt & Penfield LLP, and
27 Karen Hanson Riebel of Lockridge Grindal Nauen PLLP; and
28

- 1 c. Additional Class Counsel: Daniel Robinson of Robinson Calcagnie, Inc
- 2 (5) Finally approves the Notice Program as implemented;
- 3 (6) Finally appoints Heffler as the Claims Administrator;
- 4 (7) Overrules all objections; and
- 5 (8) Grants further relief as the Court deems just and proper.

6
7 DATED: January 31, 2020

Respectfully submitted,

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9 MORGAN & MORGAN
COMPLEX LITIGATION GROUP
John A. Yanchunis

10 /s/ John A. Yanchunis
11 John A. Yanchunis

12 201 N. Franklin Street, 7th Floor
13 Tampa, FL 33602
14 Telephone: 813/223-5505
813/223-5402 (fax)

15 ROBBINS GELLER RUDMAN
& DOWD LLP
16 Stuart A. Davidson (Admitted *Pro Hac Vice*)
120 East Palmetto Park Road, Suite 500
17 Boca Raton, FL 33432
18 Telephone: 561/750-3000
561/750-3364 (fax)
19 sdavidson@rgrdlaw.com

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BLATT & PENFIELD LLP
21 Gayle M. Blatt (122048)
110 Laurel Street
22 San Diego, CA 92101
23 Telephone: 619/238-1811
619/544-9232 (fax)

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Minneapolis, MN 55401
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612/339-0981 (fax)

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*Attorneys for Plaintiffs and Settlement Class
Counsel*

CERTIFICATE OF SERVICE

I hereby certify that January 31, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed January 31, 2020.

/s/ John A. Yanchunis
John A. Yanchunis
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LITIGATION GROUP
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