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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JANE DOE 1, JANE DOE 2, JANE DOE 3, JANE
DOE 4, and JANE DOE 5, individually and on
behalf of others similarly situated,

Plaintiffs,

v.

UNITED STATES OF AMERICA, GOOGLE LLC,
and X.AI Corp.,

Defendants.

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Attorneys for Defendant Google LLC

Case No. 5:26-cv-02624-VKD

**[PROPOSED] STIPULATED
PROTECTIVE ORDER
REGARDING PUTATIVE CLASS
MEMBERS' IDENTITIES**

Judge: Hon. Virginia K. DeMarchi

1 Plaintiffs and Defendants United States of America (“United States”), Google LLC
2 (“Google”), and X.AI Corp. (“X.AI”) have agreed to a mechanism to provide the identities of
3 putative class members to counsel for Defendants in the above-captioned litigation, as well as to
4 certain other individuals, as set forth below.

5 Any person subject to this Protective Order shall adhere to these terms, upon pain of
6 contempt:

7 1. A putative class member, through her counsel or on her own behalf, may
8 confidentially provide her identity to the undersigned counsel for Google, counsel for X.AI, or
9 counsel for United States.

10 2. The following persons may receive notice of the putative class members’ identities:
11 (a) counsel for the party or parties in this litigation to whom the putative class members’ identities
12 were sent; (b) employees of the party or parties in this litigation to whom the putative class
13 members’ identity was sent who have a need to know the putative class members’ identities in the
14 performance of their duties related to this litigation; (c) persons regularly in the employ of or
15 consultants to counsel for the party or parties in this litigation to whom the putative class members’
16 identities were sent who have a need to know the putative class members’ identities in the
17 performance of their duties related to this litigation and who have signed the Non-Disclosure
18 Agreement; (d) expert witnesses disclosed under Federal Rule of Civil Procedure 26(a)(2) who
19 have signed the Non-Disclosure Agreement; and (e) claims administrators mutually selected by all
20 parties.

21 3. With respect to individuals not covered by paragraph 2, counsel for Google, counsel
22 for X.AI, and counsel for United States may make a written request to undersigned Plaintiffs’
23 counsel describing the individual(s) and their need to know the putative class members’ identities.
24 Plaintiffs’ counsel will respond to such requests within seven (7) days. Individuals permitted to
25 receive notice of the putative class members’ identities will first sign the Non-Disclosure
26 Agreement.

4. Counsel for Google, counsel for X.AI, and counsel for United States shall maintain copies of all signed undertakings of the Non-Disclosure Agreement.

5. Any person who learns of the putative class members' identities pursuant to this Protective Order shall use that information only for purposes of this litigation and shall not disclose any putative class members' identities to anyone except persons identified in paragraph 2, absent Court order.

IT IS SO STIPULATED, through undersigned Counsel of Record.

Dated: August 28, 2026

Respectfully submitted,

/s/ Kevin M. Osborne

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Counsel for United States

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

The Honorable Virginia K. DeMarchi
United States Magistrate Judge

APPENDIX 1**NON-DISCLOSURE AGREEMENT**

I, _____, acknowledge that I have read and understand the Protective Order in this action dated [_____, 2026. I agree to comply with and to be bound by all the terms of this Protective Order and I understand and acknowledge that failure to so comply could expose me to sanctions and punishment in the nature of contempt. I solemnly promise that I will not disclose in any manner any information or item that is subject to this Protective Order to any person or entity except in strict compliance with the provisions of this Order. By acknowledging these obligations under the Protective Order, I understand that I am submitting myself to the jurisdiction of the United States District Court for the Northern District of California for the purpose of any issue or dispute arising hereunder and that my willful violation of any term of the Protective Order could subject me to punishment for contempt of Court.

Dated: _____

Name: _____
Title: _____