

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

AMI - GOVERNMENT EMPLOYEES  
PROVIDENT FUND MANAGEMENT  
COMPANY LTD., Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ALPHABET INC., GOOGLE LLC, and  
SUNDAR PICHAI

Defendants.

Case No. 3:23-CV-01186-RFL-SK

**NOTICE OF PENDENCY OF CLASS ACTION**

**PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHTS MAY BE  
AFFECTED BY PROCEEDINGS IN THIS ACTION.**

**TO: ALL PURCHASERS AND ACQUIRERS OF ALPHABET INC. CLASS A AND/OR CLASS C  
SHARES WHO PURCHASED OR ACQUIRED SHARES ON (i) ANY STOCK EXCHANGES  
LOCATED IN THE UNITED STATES, (ii) ON ANY ALTERNATIVE TRADING SYSTEMS  
LOCATED IN THE UNITED STATES, OR (iii) PURSUANT TO OTHER DOMESTIC  
TRANSACTIONS DURING THE PERIOD FROM SEPTEMBER 15, 2020 THROUGH AND  
INCLUDING JANUARY 23, 2023 (THE “CLASS”).**

**Excluded from the Class are the Defendants, members of the immediate family of the Individual Defendant, Alphabet Inc.’s (“Alphabet” or the “Company”) subsidiaries and affiliates; any person who is or was an officer or director of the Company or any of the Company’s subsidiaries or affiliates during the Class Period; any entity in which any Defendant has a controlling interest; and the legal representatives, heirs, successors, and assigns of any such excluded person or entity.**

**PLEASE NOTE: THE COURT HAS NOT RULED ON THE MERITS OF CLASS REPRESENTATIVES’  
CLAIMS OR ON DEFENDANTS’ DENIALS OR OTHER DEFENSES, AND THIS CASE HAS NOT  
BEEN SETTLED. THIS NOTICE IS INTENDED ONLY TO INFORM YOU THAT A CLASS ACTION IS  
CURRENTLY IN PROGRESS. THERE IS NO CLAIM FORM TO BE MAILED.**

This Notice is issued pursuant to Rule 23 of the Federal Rules of Civil Procedure and the Order of the United States District Court for the Northern District of California (the “Court”), entered on May 18, 2026, certifying the above-captioned action as a class action. The purpose of this Notice is to inform you of: (a) the pendency of the captioned class action before the Honorable Rita F. Lin in the United States District Court for the Northern District of California (the “Action”); (b) the certification of the Class defined above, of which you may be a member (“Class Member”); and (c) your right to be excluded from the Class. This Action has not been settled and continues to be litigated. Accordingly, no claim form need be filed at this time.

If you purchased or otherwise acquired shares of Alphabet Class A and/or Class C stock during the period of September 15, 2020 through January 23, 2023, both dates inclusive, you may be a member of the Class. As a Class Member, you will be bound by the result of any trial of the Action, any judgment entered by the Court, and any determination made by the Court, unless you timely mail a request for exclusion, as described below, postmarked no later than **September 16, 2026**.

**DESCRIPTION OF THE ACTION**

**Summary of the Action**

The Class Representatives in this action are Lead Plaintiffs Menora Mivtachim Insurance Ltd. and Menora Mivtachim Pensions and Gemel Ltd. (“Menora”) and additional Named Plaintiffs AMI - Government Employees Provident Fund Management Company Ltd. and City of Fort Lauderdale Police & Fire Retirement System, whom the Court has appointed to represent the Class.

The Defendants in this action are Alphabet, Google LLC, and Sundar Pichai (collectively, the “Defendants”).

This is an action for violations of Section 10(b) of the Exchange Act and Rule 10b-5 promulgated thereunder and Section 20(a) of the Exchange Act. The Second Amended Class Action Complaint (“SAC”) alleges that on September 14, 2020, in a written response to Congress following CEO Pichai’s Congressional testimony, Google and Pichai made the following false and misleading statement about how Google’s advertising technology products worked: “*[t]he channel through which a bid is received does not otherwise affect the determination of the winning bidder.*” The Court found that the SAC sufficiently alleged that this representation was materially false and misleading when made. ECF No. 108 at 8–10. The Court also found that the SAC sufficiently alleged that this representation was made with scienter (that is, an intent to deceive, manipulate, or defraud) based on a number of circumstantial factors. ECF No. 108 at 10–12.

The Defendants deny all claims and wrongdoing asserted in the SAC and any liability arising out of the conduct alleged therein. The Defendants filed an answer to the SAC on May 1, 2025, denying all material allegations and asserting multiple defenses.

The Court has not made any determination about whether the Defendants engaged in any alleged misconduct or wrongdoing.

### **Prosecution of the Action**

On March 16, 2023, plaintiff AMI - Government Employees Provident Fund Management Company Ltd. filed a putative securities class action complaint against defendants Alphabet Inc., Sundar Pichai, Ruth M. Porat, and Philipp Schindler. ECF No. 1. Two motions for appointment as lead plaintiff were filed. ECF Nos. 19, 22. On May 30, 2023, the only other movant withdrew his motion (ECF No. 27), and on June 9, 2023, the Court appointed Menora as Lead Plaintiff and Pomerantz LLP as lead counsel. ECF No. 29.

Defendants filed a motion to dismiss Plaintiffs’ first Amended Complaint on September 21, 2023. ECF No. 58. Plaintiffs opposed that motion and briefing was completed on December 11, 2023. ECF Nos. 60, 67. A hearing on this motion took place on April 16, 2024. The Court ruled on Defendants’ motion to dismiss on September 3, 2024 (ECF No. 86), granting the motion with leave to amend the complaint. After Plaintiffs filed the SAC, Defendants moved to dismiss the complaint on November 8, 2024. ECF No. 93. Briefing was completed on January 21, 2025. ECF Nos. 98, 101. After a hearing on the motion to dismiss the SAC on March 4, 2025, the Court issued an Order on March 24, 2025, granting in part and denying in part Defendants’ motion to dismiss the SAC. ECF No. 108. Plaintiffs filed a motion for class certification. ECF No. 134. Defendants opposed and the class certification motion was fully briefed on April 2, 2026, when Defendants requested to file a surreply that the Court ultimately permitted. ECF Nos. 142, 148, 149-1, 168. The Court held oral argument on April 14, 2026 (ECF No. 153). It granted class certification on May 18, 2026. ECF No. 168. The Court certified the Class, appointed the Plaintiffs as Class Representatives and Pomerantz LLP as Class Counsel. *Id.* Certification of the Class means that the action was legally recognized as a Class Action pursuant to Rule 23 of the Federal Rules of Civil Procedure. The class definition is as follows:

All persons and entities other than Defendants, members of the immediate family of the Individual Defendant, Alphabet Inc.’s (“Alphabet” or the “Company”) subsidiaries and affiliates; any person who is or was an officer or director of the Company or any of the Company’s subsidiaries or affiliates during the Class Period; any entity in which any Defendant has a controlling interest; and the legal representatives, heirs, successors, and assigns of any such excluded person or entity, who purchased or otherwise acquired Alphabet’s Class A and/or Class C shares between September 15, 2020 and January 23, 2023, both dates inclusive (the “Class Period”) on (i) any stock exchanges located in the United States, (ii) on any alternative trading systems located in the United States, or (iii) pursuant to other domestic transactions, seeking to recover damages caused by Defendants’ violations of the federal securities laws and to pursue remedies under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (the “Exchange Act”) and Rule 10b-5 promulgated thereunder, against Alphabet, Google LLC (“Google”), and Sundar Pichai.

This Notice is being sent to notify you that you may be a member of the Class whose rights could be affected by this Action. It is not an expression of any opinion by the Court concerning the merits of the Action. There is no assurance that a judgment in favor of the Class will be granted. This Notice is intended to advise you of the pendency of the Action and of your rights with respect to the Action, including the right either to remain a Class Member or to exclude yourself from the Class.

### **INSTRUCTIONS TO CLASS MEMBERS**

If you fit the description of a Class Member, you have a choice whether or not to remain a member of the Class on whose behalf this Action is being maintained.

If you wish to remain a Class Member, you are not required to do anything at this time. If you do nothing, you will remain a Class Member and will be bound by the result of any judgment, before or after trial, whether favorable or unfavorable. If you choose to remain in the Class, you will not be able to pursue a lawsuit on your own with regard to any of the issues that were or could have been decided in this Action. If you remain in the Class, you are not personally responsible for any expenses or attorneys' fees. If there is a recovery, you may be entitled to share in the proceeds, less costs, expenses, plaintiff reimbursement award and attorneys' fees as the Court may allow out of any recovery.

There is no settlement or judgment in the Action at this time. In the event of recovery, you will only be able to share in a recovery in this Action if you are a member of the Class and were damaged thereby.

The Class is represented by:

Jeremy Lieberman, Esq.  
Pomerantz LLP  
600 Third Avenue  
20th Floor  
New York, New York 10016  
Telephone: 212-661-1100

If you desire to be excluded from the Class, you must state so **in writing**. Your request for exclusion must state: the name, telephone number, and address of the person or entity requesting exclusion, that such person or entity requests exclusion from the Class in this Action, the number of Alphabet Class A and/or Class C shares purchased or acquired and the date the shares were purchased or acquired, and must be signed by that person or entity requesting exclusion from the Class. Requests for exclusion must be transmitted by first class mail or overnight delivery service to the Notice Administrator at the following address:

Alphabet Securities Litigation  
PO Box 6018  
Portland, OR 97228-6018

**To be effective, your Request for exclusion must be postmarked no later than September 16, 2026.**

If you wish to participate in this Action, do not request exclusion. If you exclude yourself from the Class, you will not be bound by any judgment or decision by the Court in this Action, but you will also not be entitled to share in the benefits of any judgment favorable to the Class or from any Court-approved settlement that may be entered into on behalf of the Class. If you request exclusion, you would be entitled to pursue any individual remedy which you may have, but only at your own expense.

### **YOUR RIGHT TO APPEAR**

If you do not request exclusion from the Class in the manner set forth above, you may, if you so desire, enter an appearance through an attorney of your own choice. If you wish, you may also consult with your own counsel concerning your rights in this Action.

If you do not timely request exclusion from the Class in writing postmarked by **September 16, 2026**, you will be considered a Class Member, and you will be bound by any judgment in this Action and will not be able to pursue any individual remedy which you may have.

### **NOTICE TO BANKS, BROKERS AND OTHER NOMINEES**

If you held any Alphabet Class A and/or Class C shares purchased or acquired during the Class Period as nominee for a beneficial owner, then, within ten (10) days after you are contacted by the Notice Administrator, you must either: (1) request from the Notice Administrator sufficient copies of the Postcard Notice to forward to all such beneficial owners and provide the Notice Administrator confirmation of the date that the Postcard Notice was sent or (2) provide a list of the names and addresses of such beneficial owners to the Notice Administrator, preferably in an MS Excel data table setting forth: (a) title/registration, (b) street address, (c) city/state/zip; on electronic mailing labels in MS Word file (label size Avery #5162), or printed out on physical mailing labels. If you choose the second option, the Notice Administrator will send a copy of the Postcard Notice to the beneficial owners. Upon full compliance with these directions, such nominees may seek reimbursement of their reasonable expenses actually incurred, by providing the Notice Administrator with proper documentation supporting the expenses for which reimbursement is sought.

Copies of this Notice may be obtained from the website, [www.AlphabetSecuritiesLitigation.com](http://www.AlphabetSecuritiesLitigation.com), by calling the Notice Administrator toll-free at 877-386-7785, emailing the Notice Administrator at [info@AlphabetSecuritiesLitigation.com](mailto:info@AlphabetSecuritiesLitigation.com), or by contacting the Notice Administrator at:

Alphabet Securities Litigation  
PO Box 6018  
Portland, OR 97228-6018

### **EXAMINATION OF PAPERS AND INQUIRIES**

For further information about the Action, you may contact Class Counsel at the addresses listed above or consult the pleadings and other papers filed in the Action at the Office of the Clerk of the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, during normal business hours of each business day. If you have an account with PACER, you may consult the pleadings and other papers via Electronic Case Filing at the website of the Northern District of California, <https://ecf.cand.uscourts.gov>.

If you have any questions concerning this case or your membership in the Class please contact the Notice Administrator at:

Alphabet Securities Litigation  
PO Box 6018  
Portland, OR 97228-6018  
[info@AlphabetSecuritiesLitigation.com](mailto:info@AlphabetSecuritiesLitigation.com)  
[www.AlphabetSecuritiesLitigation.com](http://www.AlphabetSecuritiesLitigation.com)  
877-386-7785

**INQUIRIES SHOULD NOT BE DIRECTED TO THE COURT, THE CLERK'S OFFICE, THE DEFENDANTS, OR DEFENDANTS' COUNSEL.**

Dated: July 22, 2026

**By Order of the Court  
United States District Court  
Northern District of California**