

1 **BOTTINI & BOTTINI, INC.**
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2 Albert Y. Chang (SBN 296065)
Anne B. Beste (SBN 326881)
3 Yury A. Kolesnikov (SBN 271173)
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9 **COHEN MILSTEIN SELLERS & TOLL PLLC**
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14 *Co-Lead Counsel for Plaintiffs*

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **IN AND FOR THE COUNTY OF SANTA CLARA**

18 IN RE ALPHABET INC. SHAREHOLDER
19 DERIVATIVE LITIGATION

20 This Document Relates To:

21 ALL ACTIONS.

Lead Case No.: 19CV341522

**NOTICE OF MOTION AND
22 PLAINTIFFS' UNOPPOSED MOTION
23 FOR PRELIMINARY APPROVAL OF
24 SETTLEMENT**

Hearing Date: October 22, 2020
Time: 1:30 p.m.
Judge: Hon. Brian C. Walsh
Department: 1

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that, on October 22, 2020 at 1:30 p.m., or as soon thereafter as
3 the matter can be heard in Department 1 at the Santa Clara Superior Court, located at 191 North
4 First Street, San Jose, CA 95113, the Honorable Brian C. Walsh presiding, Co-Lead Plaintiffs
5 Northern California Pipe Trades Pension Plan, Teamsters Local 272 Labor Management Pension
6 Fund, and James Martin will move this Court for an order: (1) preliminarily approving a proposed
7 settlement of this action (“Settlement”) as set forth in the Stipulation and Agreement of Settlement
8 dated August 20, 2020 (“Stipulation”), which is attached as Exhibit 1 to the accompanying Joint
9 Declaration of Francis A. Bottini, Jr. and Julie Goldsmith Reiser; (2) approving the method for
10 providing notice to current Alphabet, Inc. shareholders regarding the pendency of the Settlement
11 and the form of the proposed Notice and Summary Notice; (3) directing that the Notice and
12 Summary Notice be published and posted as provided in the Stipulation; and (4) setting a date for
13 the Settlement Hearing and a schedule of events.

14 This Motion is based on this Notice of Motion and Motion, the Memorandum of Points and
15 Authorities, and the accompanying Joint Declaration of Francis A. Bottini, Jr. and Julie Goldsmith
16 Reiser, with exhibits, all other pleadings and matters of record, and any such argument as the Court
17 may allow on the motion.

18 Defendants do not oppose this Motion.

19 Dated: September 25, 2020

Respectfully submitted,

20 **BOTTINI & BOTTINI, INC.**

Francis A. Bottini, Jr.

Albert Y. Chang

Anne B. Beste

Yury A. Kolesnikov

21 By: /s/ Francis A. Bottini, Jr.

Francis A. Bottini, Jr.

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