

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

*April Curley, et al. v. Google, LLC., CASE NO: 4:22-cv-01735-KAW*

**NOTICE OF CLASS ACTION, PROPOSED SETTLEMENT  
AGREEMENT, AND FINAL APPROVAL HEARING**

**If you are or were an employee of Google LLC identified in Google’s records as Black or Black+ who held a level 3, 4, 5, and/or 6 job located in California at any time from March 18, 2018 through December 31, 2023, and/or a level 3, 4, 5, and/or 6 job located in New York from October 15, 2017 through December 31, 2023, you may be eligible to participate in a class action settlement, subject to certain other eligibility criteria described below. Please read this notice carefully as a class action settlement will affect your rights.**

*A federal court has authorized this notice. This is not junk mail, an advertisement, or a solicitation from a lawyer.*

On December 7, 2025, Judge Westmore of the United States District Court for the Northern District of California granted preliminary approval of a proposed class action settlement in the lawsuit *Curley et al. v. Google, LLC*, Case No. 4:22-cv-01735-KAW. The Court ordered this notice to inform you of your rights and options under the proposed Settlement, which will provide a Settlement Fund of \$50 million for a Settlement Class of certain Black and Black+ Google employees to resolve the case listed above.

<b>Your Options in this Settlement:</b>	
<b>Do Nothing</b>	If you do nothing, you will be eligible to participate in the proposed Settlement, seek payment, and release claims against Google. (See Section 5.A below). The Court still must decide whether to approve the proposed Settlement. If the Court approves the proposed Settlement, you will be mailed a separate notice about your rights and what you must do to seek money from the Settlement.
<b>Exclude Yourself (Opt Out)</b>	If you want to exclude yourself (or “opt out”) of the proposed Settlement, you must follow the directions outlined in Section 5.B below. If you exclude yourself, you will not receive a payment and you cannot object to the proposed Settlement, but you will keep any rights to sue Google in a separate lawsuit.  You must opt out of the Settlement by March 20, 2026.
<b>Object</b>	If you want to object to the proposed Settlement, you must write to the Court about why you believe the proposed Settlement is unfair to the class by following the instructions outlined in Section 5.C below.  Deadline to Object: March 20, 2026.

These options—and the deadlines to exercise them—are explained in this notice.

**What This Notice Contains**  
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## 1. Purpose of This Notice

The purpose of this notice is to inform you about: (i) this lawsuit, (ii) the proposed Settlement and Settlement Class definition that the Court has preliminarily approved, and (iii) your legal rights and options in connection with the Settlement and a Final Approval Hearing to be held before the Court on May 7, 2026, to consider the fairness, reasonableness, and adequacy of the Settlement and related matters. This notice also describes the steps to be taken by those who wish to be excluded from the Settlement Class or to object to the Settlement, and, for those who remain in the Settlement Class, the steps necessary to seek a share of the Settlement Fund if the Court approves the proposed Settlement.

This notice summarizes the proposed Settlement. For the precise terms of the Settlement, please see the Settlement Agreement available:

- at [www.CurleySettlement.com](http://www.CurleySettlement.com)
- by contacting Settlement Class Counsel at 1-312-431-0888
- by contacting the Claims Administrator at Curley Settlement, c/o Atticus Administration, PO Box 64053, Saint Paul, MN 55164, or [CurleySettlement@atticusadmin.com](mailto:CurleySettlement@atticusadmin.com), or 1-800-401-4804
- by accessing the Court docket in this case, for a fee, 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, 1301 Clay Street, Oakland, CA 94612, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

## 2. Background: About the Lawsuit

On March 18, 2022, Plaintiff April Curley, who is Black, filed a class action complaint alleging that Google discriminated on the basis of race with respect to hiring, job assignment, leveling, compensation, promotion and advancement, performance reviews, allocation of resources, transfers, discipline, and attrition, among other things, as well as retaliated against, failed to investigate complaints, and maintained a racially hostile work environment against Google's Black and Black+<sup>1</sup> employees. She brought class claims under federal, state, and local anti-discrimination laws, and later amended the Complaint over the course of the litigation. Two additional Named Plaintiffs in the lawsuit are also part of the Settlement Class: Desiree Mayon, who is Black+, and Ronika Lewis, who is Black. Together these individuals are called "Settlement Class Representatives" because they brought the lawsuit seeking to represent a group (or "class") of allegedly similarly situated Black or Black+ employees.

The Class Action Complaint describes all the claims and can be found at [www.CurleySettlement.com](http://www.CurleySettlement.com). The lawsuit is known as *Curley, et al. v. Google, LLC*, Case No. 4:22-cv-01735-KAW.

Google denies all of the allegations in the lawsuit and maintains that it has fully complied with all applicable laws, rules, and regulations at all times. It also denies that the claims can proceed on a class basis or are appropriate for class treatment, except for purposes of this Settlement only. The

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<sup>1</sup> A Black+ designation refers to an individual who Google's records identified as Black or African American and one or more other races or ethnicities.

Court has not ruled on the merits of these claims, has made no findings of fault, has not decided that the lawsuit can proceed as a class action, and has not awarded damages. The Settlement is a compromise of alleged claims and is not an admission of liability on the part of Google or anyone else. The parties have reached this Settlement in order to avoid the expense, risk, and uncertainty of further litigation.

### **3. Class Definition**

You are a member of the Settlement Class affected by the Settlement if you fit within this definition:

All individuals identified in Google's records produced to Settlement Class Counsel on November 20, 2024 as Black or Black+ who worked in job levels 3, 4, 5 and/or 6 in a job located in California at any time from March 18, 2018 through December 31, 2023, and/or job levels 3, 4, 5, and/or 6 in a job located in New York at any time from October 15, 2017 through December 31, 2023, excluding employees who (a) exclusively held a job that Google's records identified as being within a Legal job family or subfamily, or (b) are identified in Google's records as having executed a general release of claims at any time between October 15, 2017 (for New York employees) or March 18, 2018 (for California employees) and December 7, 2025

If you received this notice in a mailing addressed to you, then Google's records show that you are a Settlement Class Member, *i.e.*, that you fit the definition above. If so, you have legal rights and options that you can exercise before the Court finally approves the Settlement.

### **4. Summary of Proposed Settlement Terms**

The proposed Settlement includes monetary and non-monetary terms.

Google has agreed to create a Settlement Fund in the total amount of \$50 million. The Settlement Fund will cover payments to Settlement Class Members, Service Awards to the Settlement Class Representatives if the Court chooses to award them, Settlement Class Counsel's Attorneys' Fees and Costs, payroll taxes, and the costs of administering the Settlement Fund.

The non-monetary terms of the Settlement are summarized below. A comprehensive list of these terms can be found in Section VII of the Settlement Agreement.

- Google will continue its practice of analyzing employee pay to identify differences by race that are not otherwise explained by legitimate criteria before finalizing any pay changes for the following year.
- Google will maintain methods for employees to report concerns about their employment, including that they believe they are paid or reviewed unfairly. Google will investigate these concerns and take remedial action where appropriate.
- Google will maintain robust leveling policies and practices designed to ensure that leveling decisions at hire are and remain fair and based on legitimate, business-related criteria.
- Google will provide information to applicants and employees regarding salary ranges and will continue its practice of not asking for applicants' salary history.

- Google will not require any employee to enter into mandatory arbitration agreements for employment-related disputes or enforce existing mandatory arbitration agreements for employment-related disputes through and including August 2026.

## **5. How to Proceed: Your Options**

### **Option A: Do Nothing (for Now) and Wait Until the Court Decides on Final Approval of the Settlement**

The Court still must decide whether to grant Final Approval of the Settlement. If you wish to participate in the Settlement, and do not wish to object, you may do nothing in response to this Notice and wait for further notice from the Court. If the Court approves the Settlement, you will release and not be able to sue (or continue to sue) Google for the claims covered by this Settlement, and you will receive a separate notice advising you of your rights and the process and deadlines by which you must act to receive a payment from the Settlement Fund.

### **Option B: Exclude Yourself from or “Opt Out” of the Settlement**

If you do not want to participate in the Settlement but wish to retain your own rights to sue (or continue to sue) Google separately for the claims covered by this Settlement, you must request to opt out of, or be excluded from, this Settlement. If you opt out, you will not be eligible for any monetary award from the Settlement. However, you will keep any rights you might have to sue Google separately for the legal claims covered by this Settlement.

If you wish to opt out, you must send a written, signed statement that you are opting out of the Settlement to the Claims Administrator. You can send the opt-out statement to the address listed below or submit it online at [www.CurleySettlement.com](http://www.CurleySettlement.com). To be effective, this opt-out statement must be (1) postmarked or submitted to [www.CurleySettlement.com](http://www.CurleySettlement.com) on or before March 20, 2026, (2) state “I opt out of the class action settlement in the lawsuit *Curley, et al. v. Google*,” and (3) include your name, address, telephone number, and signature.

The address of the Claims Administrator is:

Curley Settlement  
c/o Atticus Administration  
PO Box 64053  
Saint Paul, MN 55164

If you submit an opt-out statement, you still may later rescind your opt out (*i.e.*, you may change your mind and stay in the Settlement Class). To be effective, such rescissions must be submitted in writing via mail or submitted online at [www.CurleySettlement.com](http://www.CurleySettlement.com) and received by the Claims Administrator by May 6, 2026, which is one (1) day before the Final Approval Hearing currently scheduled for May 7, 2026.

If you submit a timely and valid opt-out statement, you will have no right to object to the Settlement or to obtain a payment from the Settlement Fund, and you will no longer be represented by Settlement Class Counsel. You will not be legally bound by anything that happens in this lawsuit. You may also be able to sue (or continue to sue) Google in the future regarding the same claims asserted in this lawsuit.

## **Option C: Object to the Settlement**

You can ask the Court to deny approval of the Settlement by filing an objection. You can't ask the Court to order a different settlement; the Court can only approve or reject 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 should object.

Any objection to the proposed Settlement must be in writing. Your objection must also explain specifically the grounds for your objection, and state whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class. 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. If you or your attorney intend to speak at the Final Approval Hearing, please clearly state that in your written objection.

All written objections and supporting papers must (a) clearly identify the case name and number (*Curley, et al. v. Google*, Case No. 4:22-cv-01735-KAW), (b) be submitted to the Court either by filing them electronically or in person at any location of the United States District Court for the Northern District of California or by mailing them to the Class Action Clerk, United States District Court for the Northern District of California, 1301 Clay Street, Oakland, CA 94612, and (c) be filed or postmarked on or before March 20, 2026. If you or your attorney intend to speak at the Final Approval Hearing, please also explicitly state your intent to do so.

## **6. What Will Happen If the Settlement Is Approved**

If you do not opt out, you will remain a part of the Settlement Class and be eligible to seek payment from the Settlement Fund. The Court will hold the Final Approval Hearing and you, as a Settlement Class Member, will be represented by Settlement Class Counsel at no cost to you. If the Court gives Final Approval to the Settlement, you will receive a separate notice advising you of your rights and the process to receive a payment from the Settlement Fund. This process is described in Section 8 of this notice.

## **7. Release**

If the Court grants Final Approval of the Settlement, then all Settlement Class Members who do not opt out will release Google from all claims of race-based employment discrimination including without limitation any suits, actions, causes of action, complaints, charges, grievances, claims, rights, demands, debts, losses, damages, punitive or statutory damages, penalties, expenses, obligations, and/or liabilities arising from alleged race-based employment discrimination, including those related to hiring, job assignment, pay, leveling, promotions, performance reviews, transfers, terminations or constructive discharges, failure to investigate, retaliation, or hostile work environment under any federal, state, or local law, including but not limited to 42 U.S.C. § 1981; Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e *et seq.* (“Title VII”); FEHA, Cal. Gov. Code § 12904, *et seq.*; the California Equal Pay Act; the New York State Human Rights Law, Executive Law §§ 296 *et seq.* (“NYSHRL”); and the New York City Human Rights Law, N.Y.C. Admin. Code §§ 8-101 *et seq.* (“NYCHRL”).

To “release” a claim means that you cannot sue Google or related parties for any of the claims covered by the release. Unless you opt out of the Settlement, you will be covered by the release,

even if you do not submit a Claim Form for an Individual Settlement Payment (discussed further below).

## **8. How Will My Settlement Award Be Calculated?**

Each Settlement Class Member, including you, will be eligible for an Individual Settlement Payment from the Settlement Fund if the Court approves the Settlement. You do not have to take action now, and instructions for receiving an Individual Settlement Payment will be included in the Final Approval Notice that will be sent to you if the Court approves the Settlement.

If the Court approves the Settlement, you will have to fill out and submit to the Claims Administrator a Claim Form and IRS Forms W-4 and W-9 to receive an Individual Settlement Payment. The Claim Form is available by logging in online at [www.CurleySettlement.com](http://www.CurleySettlement.com) using the Claimant ID provided at the top of this notice.

You must complete a Claim Form by following the Form's instructions, which requests evidence of alleged (a) race discrimination and/or retaliation, (b) financial losses, and (c) emotional distress, if any. To seek financial recovery for any period after your employment with Google, you must submit documentary evidence of your post-Google income. To seek financial recovery for alleged emotional distress, you must complete the section of the Claim Form regarding emotional distress and may submit any additional documentation you deem appropriate.

The Trustee appointed by the Court, and/or a Neutral that works with the Trustee, will assess your claim and determine an Individual Settlement Payment based on all available information, including the individual facts and circumstances of your claim and all claims submitted by Participating Settlement Class Members.

Settlement Class Counsel will be available to assist Settlement Class Members in the claims resolution process. You may also retain your own attorney to assist you in this process, at your own expense. Your Claim Form will remain strictly confidential and will be disclosed to only Settlement Class Counsel, the Trustee, any Neutral evaluating your claim, and the Claims Administrator. Neither your Claim Form nor the contents thereof will be disclosed to Google.

All Individual Settlement Payments will be reviewed and approved by the Trustee appointed by the Court to make sure they are fair and consistent. You will not have a right to challenge your Individual Settlement Payment approved by the Trustee, and all Individual Settlement Payments are final, binding, and non-appealable.

## **9. Are There Tax Consequences for Any Money I Might Get?**

Yes, a portion of your award may be subject to lawful deductions and withholdings, like a paycheck, and a portion of your award may be taxed as non-wage income. The Trustee will be responsible for allocating any monetary payments appropriately between different types of income or monetary compensation (*e.g.*, wages, emotional distress). The Claims Administrator will withhold, remit, and report your share of payroll taxes from the Settlement Fund based on the W-4 form you fill out. After the end of the calendar year in which the payments are made, the Claims Administrator will issue each Settlement Class Member who cashes a check the appropriate IRS forms. Ultimately, you will be responsible for any and all individual taxes owed on any Individual Settlement Payment.

Settlement Class Counsel are not tax advisors and cannot give you advice on any tax matters.

Settlement Class Counsel urge you to consult your tax advisor for answers to any questions you may have about the tax implications of any potential award. Google makes and has made no representations as to the taxability of any portion of any award you receive from the Settlement Fund.

#### **10. The Lawyers Representing You and the Settlement Class**

As a Settlement Class Member, you are represented in this litigation by Settlement Class Counsel:

Linda D. Friedman  
Stowell & Friedman, Ltd.  
303 W. Madison, Suite 2600  
Chicago, IL 60606-3395  
Telephone: (312) 431-0888  
[lfriedman@sfltd.com](mailto:lfriedman@sfltd.com)

Unless you opt out, you will continue to be represented by Settlement Class Counsel in connection with implementation of the Settlement at no cost to you. Although it is not required, you may, if you wish, retain your own attorney at your own expense.

#### **11. How Will the Lawyers Be Paid?**

Settlement Class Counsel have pursued these claims on behalf of the Settlement Class Representatives and the Settlement Class without receiving any compensation for their services or reimbursement of the litigation expenses they incurred. If you are a Settlement Class Member and receive an award from the Settlement Fund, you will not owe any fees or expenses to the lawyers who have represented you as part of the Settlement Class. As is common in class action cases, Settlement Class Counsel will ask the Court to award them attorneys' fees of not more than 25% of the Settlement Fund, plus reimbursement of their reasonable litigation expenses. The Court will decide how much to award Settlement Class Counsel for fees and expenses, which will be paid from the Settlement Fund.

The Motion for Attorneys' Fees and Costs will be available at [www.CurleySettlement.com](http://www.CurleySettlement.com) on or before February 10, 2026.

#### **12. Payments Specific to the Settlement Class Representatives**

Settlement Class Members have been represented in this litigation by Settlement Class Representatives April Curley, Desiree Mayon, and Ronika Lewis. The Settlement Class Representatives may participate in the Settlement claims process just like any other Settlement Class Member. In addition, Settlement Class Counsel will ask the Court to grant Service Awards not to exceed fifty thousand dollars (\$50,000) for each of the Settlement Class Representatives in recognition of the benefits the Settlement Class Representatives achieved for the Settlement Class, the risks they faced in bringing the case, and the time they spent pursuing the lawsuit and the proposed Settlement for Settlement Class Members.

### **13. The Final Approval Hearing**

The Final Approval Hearing on the proposed Settlement will be held at 1:30 p.m. on May 7, 2026, in the courtroom of the Honorable Kandis A. Westmore at the United States District Court for the Northern District of California, 1301 Clay Street, Oakland, CA 94612. This date may change without further notice being sent out. If the date does change, the updated date will be posted online at [www.CurleySettlement.com](http://www.CurleySettlement.com).

At this Final Approval Hearing, the Court will determine whether the proposed Settlement is fair, reasonable, and adequate, and whether it should be approved. The Court will also consider the amount of fees and expenses to award to Settlement Class Counsel, the amount of the Service Awards to grant to the Settlement Class Representatives, and whether, in accordance with the proposed Settlement, an order and judgment should be entered bringing the litigation of claims on behalf of the Settlement Class to an end.

### **14. Do I Have to Come to the Final Approval Hearing?**

No. You are not required to come to the Final Approval Hearing, but you are welcome to attend at your own expense. Settlement Class Counsel will appear at the Final Approval Hearing on behalf of all Settlement Class Members at no cost to you. If you file and serve an objection by the deadline you may, but do not have to, come to Court to talk about it. As long as you filed your written objection as explained above in Section 5, the Court will consider it. You may also hire a lawyer to attend for you at your own expense, but it is not required. If the Court gives final approval to this Settlement, the Court's judgment will be final and binding on all Settlement Class Members who have not submitted timely and valid requests to opt out.

### **15. Getting More Information**

If you have further questions, you can get free help at [www.CurleySettlement.com](http://www.CurleySettlement.com), by calling the Claims Administrator at 1-800-401-4804, or by calling or writing to Settlement Class Counsel in this case at the contact information listed in Section 10.

### **Again, the important deadlines are:**

**Last Day to Opt Out of the Settlement Class:** March 20, 2026

**Last Day to Object to the Settlement:** March 20, 2026

**Final Approval Hearing:** May 7, 2026. This date may change without further notice. If the date does change, the updated date will be posted online at [www.CurleySettlement.com](http://www.CurleySettlement.com).

**PLEASE DO NOT CALL OR CONTACT THE COURT, THE OFFICE OF THE CLERK OF COURT, OR GOOGLE WITH QUESTIONS REGARDING THIS NOTICE.**