

JOHN Q. KELLY (Admitted *Pro Hac Vice*)
 FERGUSON COHEN LLP
 25 Field Point Road
 Greenwich, CT 06830
 Telephone: (203) 661-5222
 Facsimile: (203) 661-1197
 Email: jqkelly@fercolaw.com

JOHN P. COALE (Admitted *Pro Hac Vice*)
 2901 Fessenden Street NW
 Washington, DC 20008
 Telephone: (202) 255-2096
 Email: johnpcoale@aol.com

Attorneys for Plaintiffs

LAUREN GALLO WHITE, SBN 3090
 AMIT Q. GRESSEL, SBN 307663
 WILSON SONSINI GOODRICH & ROSATI
 Professional Corporation
 One Market Plaza
 Spear Tower, Suite 3300
 San Francisco, CA 94105-1126
 Telephone: (415) 947-2000
 Facsimile: (415) 947-2099
 Email: lwhite@wsgr.com
 Email: agresel@wsgr.com

BRIAN M. WILLEN (Admitted *Pro Hac Vice*)
 BENJAMIN D. MARGO, SBN 348644
 WILSON SONSINI GOODRICH & ROSATI
 Professional Corporation
 1301 Avenue of the Americas, 40th Floor
 New York, NY 10019-6022
 Telephone: (212) 999-5800
 Facsimile: (212) 999-5801
 Email: bwillen@wsgr.com
 Email: bmargo@wsgr.com

Attorneys for Defendants
 YOUTUBE, LLC and SUNDAR PICHAI

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

DONALD J. TRUMP et al.,

Plaintiffs,

v.

YOUTUBE, LLC et al.,

Defendants.

) CASE NO.: 4:21-cv-08009-YGR
)
) **NOTICE OF SETTLEMENT AND**
) **STIPULATION OF DISMISSAL**
) **PURSUANT TO FED R. CIV. P.**
) **41(a)(1)(A)(ii)**

) Hon. Yvonne Gonzalez Rogers
)
)
)
)
)
)
)
)
)
)

1 The Parties to the above-captioned action (the “Action”), by and through their respective
2 counsel, hereby stipulate and agree as follows:

3 1. The Parties hereby agree to settle and dismiss the Action, with prejudice, pursuant to the
4 terms of separate settlement agreements (“Settlement Agreements”) and Fed. R. Civ. P.
5 41(a)(1)(A)(ii).

6 2. As set forth in the Settlement Agreements, the terms of which shall be controlling,
7 Alphabet, of which Defendant YouTube is an indirect subsidiary, shall transfer a total of
8 \$24,500,000 (Twenty-Four Million and Five Hundred Thousand U.S. Dollars) to the
9 attorney trust account of Plaintiffs’ counsel of record, John Coale, to be allocated
10 consistent with the terms of the Settlement Agreements, as follows:

- 11 • A payment of \$22,000,000 (Twenty-Two Million U.S. Dollars) to settle and resolve
12 with Plaintiff Donald J. Trump any and all disputes and claims arising out of or
13 relating to the Action, which he has directed to be contributed, on his behalf, to the
14 Trust for the National Mall, a 501(c)(3) tax-exempt entity dedicated to restoring,
15 preserving, and elevating the National Mall, to support the construction of the
16 White House State Ballroom; and
- 17 • Payments totaling \$2,500,000 (Two Million and Five Hundred Thousand U.S.
18 Dollars) to settle and resolve with Plaintiffs American Conservative Union,
19 Andrew Baggiani, Austen Fletcher, Maryse Veronica Jean-Louis, Frank Valentine,
20 Kelly Victory, and Naomi Wolf any and all disputes and claims arising out of or
21 relating to the Action, to be distributed among them in accordance with the terms of
22 the Settlement Agreements executed between Defendants and those Plaintiffs.

23 3. This Notice of Settlement and Stipulation of Dismissal shall not constitute an admission of
24 liability or fault on the part of the Defendants or their agents, servants, or employees, and
25 is entered into by all Parties for the sole purpose of compromising disputed claims and
26 avoiding the expenses and risks of further litigation.

4. The Parties agree that this Notice of Settlement and Stipulation of Dismissal will not be used as evidence or otherwise in any pending or future civil or administrative action against Defendants or their agents, servants, or employees, or their successors.

5. Execution and filing of this Notice of Settlement and Stipulation of Dismissal shall constitute a dismissal of this action with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

Respectfully submitted,

Dated: September 29, 2025

FERGUSON COHEN, LLP

By: /s/ John Q. Kelly
John Q. Kelly
jqkelly@fercolaw.com

Attorney for Plaintiffs
DONALD J. TRUMP, KELLY VICTORY,
AUSTEN FLETCHER, AMERICAN
CONSERVATIVE UNION, ANDRES
BIAGGIANI, MARYSE VERONICA JEAN-
LOIUS, NAOMI WOLF, AND FRANK
VALENTINE

Dated: September 29, 2025

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Brian M. Willen
Brian M. Willen
bwillen@wsgr.com

Attorneys for Defendants
YOUTUBE, LLC AND SUNDAR PICHAI

SIGNATURE ATTESTATION

I, Brian M. Willen, am the ECF User whose ID and password are being used to file this document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence in the filing of this document has been obtained from the other signatory.

/s/ Brian M. Willen