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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT SEATTLE**

10 JEREMY JAEGER, on behalf of himself
11 and all others similarly situated,

12 Plaintiff,

13 v.

14 ZILLOW GROUP, INC., *et al.*,

15 Defendants.

Case No. 2:21-cv-01551-TSZ

STIPULATED MOTION AND ORDER FOR
APPROVAL OF CLASS NOTICE

1 The parties, by and through their attorneys of record, respectfully request the Court enter
2 the proposed order set forth below regarding approval of Class Notice.

3 In support of their request the parties represent the following to the Court:

4 WHEREAS, by an Order, docket no. 137, dated August 23, 2024, the Court certified the
5 above-captioned action (the “Action”) to proceed as a class action on behalf of a Class consisting
6 of:

7 All persons or entities who purchased or otherwise acquired Zillow
8 Group, Inc. Class A common stock or Class C capital stock during
9 the period from August 5, 2021, to November 2, 2021, inclusive (the
“Class Period”), and were damaged thereby.

10 WHEREAS, Defendants filed a petition for leave to review the certification Order under
11 Federal Rule of Civil Procedure (“FRCP”) 23(f), which was granted on October 24, 2024, see
12 Order (docket no. 147), and therefore this Court entered a stay of proceedings until Defendants’
13 Rule 23(f) Appeal was resolved. Minute Order (docket no. 149).

14 WHEREAS, the Ninth Circuit entered a memorandum opinion, docket no. 151, on
15 September 26, 2025, affirming the Court’s certification Order and remanded the case back to the
16 district court on January 14, 2026, see Mandate (docket no. 155).

17 WHEREAS, on February 19, 2026, this Court lifted the stay, entered a new case
18 schedule, and directed the parties to file a joint status report on a proposed class notice plan no
19 later than March 16, 2026. Minute Order at 2 (docket no. 157). The Parties, having conferred,
20 stipulate and, subject to the Court’s approval, agree as follows:

21 1. The Parties agree to the use of the form of the Notice of Pendency of Class Action
22 (the “Long Notice”), the Summary Notice of Pendency of Class Action (the “Summary Notice”),
23 and the proposed Postcard Notice of Pendency of Class Action (“Postcard Notice”).¹ See
24 Exs. 1–3 (docket nos. 158-1, 158-2, & 158-3). The Parties also agree to use the proposed form
25 entitled Request to be Excluded from the Class (“Opt-Out Form”). See Ex. 4 (docket nos. 158-4).

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27 ¹ The Long Notice, Summary Notice, and Postcard Notice are collectively referred to as the
28 “Notices.”

1 The Declaration of Paul Mulholland, President of Strategic Claims Services, Inc., Regarding
2 Providing Notice of Class Certification to Members of the Class (“Mulholland Declaration”) sets
3 out additional detail on the qualification and experience of Strategic Claims Services, Inc.
4 (“SCS”), as well as its proposed role in disseminating class notice in this matter. See Ex. 5
5 (docket nos. 158-5).

6 2. The proposed form and content of the Notices meet the requirements of FRCP
7 23(c)(2)(B), as they clearly and concisely state in plain and easily understood language all of the
8 following: (a) the nature of the Action; (b) the definition of the certified Class; (c) the Class
9 claims, issues, or defenses; (d) a Class Member’s right to enter an appearance through an
10 attorney if the member so desires; (e) a Class Member’s right to be excluded from the Class; (f)
11 the time and manner for requesting exclusion; and (g) the binding effect of a Class judgment on
12 members under FRCP 23(c)(3). The Notices, method, and schedule set forth below for notifying
13 the Class of the pendency of the Action as a class action meet the requirements of FRCP 23 and
14 of due process, constitute the best notice practicable under the circumstances, and shall constitute
15 due and sufficient notice to all persons and entities entitled thereto.

16 3. Plaintiff selects Strategic Claims Services, Inc. as the Notice Administrator.

17 4. Defendant Zillow Group, Inc. (“Zillow”) shall use reasonable efforts to, within
18 twenty-one (21) calendar days after entry of this Order for Approval of Notice and Summary
19 Notice and at no cost to the Class, have its transfer agent provide or cause to be provided to the
20 Notice Administrator security holder records (consisting of the security holder names, addresses,
21 and email addresses to the extent the transfer agent has access to them) in electronic form,
22 identifying all persons or entities who purchased Zillow securities during the period from August
23 5, 2021 to November 2, 2021, both dates inclusive. Class Counsel shall be responsible for all
24 other costs associated with disseminating the Notices.

25 5. Not later than thirty (30) calendar days from entry of this Order (“Notice Date”),
26 the Notice Administrator shall distribute the Notices, as outlined in the Mulholland Declaration,
27 and substantially in the form of Exhibits 1–3 (docket nos. 158-1, 158-2, & 158-3), to be either (a)
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1 emailed to Class Members for whom the Notice Administrator is able to obtain email addresses
2 or (b) mailed, by first-class mail, postage prepaid, to Class Members at the addresses set forth in
3 the records provided by Zillow's transfer agent, if no email address can be obtained, or who may
4 otherwise be identified with reasonable effort.

5 6. The Notice Administrator shall use reasonable efforts to give notice to Nominees²
6 such as brokerage firms and other persons and entities who may have, for the beneficial interest
7 of any person or entity other than itself or themselves, purchased Zillow securities during the
8 period from August 5, 2021, to November 2, 2021, both dates inclusive. Ex. 5 at ¶¶ 6–7 (docket
9 no. 158-5). Such Nominees shall, within seven (7) calendar days of receipt of the Notice, either:

10 (a) request sufficient copies of the Postcard Notice from the Notice Administrator
11 to mail to the beneficial owners and, within seven (7) calendar days of receipt of
12 those Postcard Notices, mail the Postcard Notice to all such beneficial owners; or

13 (b) request the link to the electronic copy of the Long Notice from the Notice
14 Administrator and, within seven (7) calendar days of receipt of the link to the
15 electronic Long Notice, email the Long Notice to beneficial owners; or

16 (c) provide a list of the names, addresses, and email addresses, to the extent email
17 addresses are available, of all such beneficial owners to the Notice Administrator,
18 whereafter the Notice Administrator is ordered to send the Postcard Notice
19 promptly to such identified beneficial owners.

20 7. If the Notice Administrator receives an email address for a beneficial owner, the
21 Notice Administrator shall email the Notice to the beneficial owner. Nominees who elect to send
22 the Postcard Notice to their beneficial owners shall send a statement to the Notice Administrator
23 confirming that the mailing of the Postcard Notice and/or emailing of the link to the electronic
24 Long Notice was made and shall retain their mailing and/or emailing records for use in
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26 ² It is anticipated that a large majority of Class Members will be beneficial purchasers who
27 hold their securities in "street name," i.e., the securities are purchased by banks, brokers, and
28 other entities known as Nominees. The Notice Administrator has identified approximately 2,400
Nominees and this list is continuously monitored and updated as needed.

1 connection with any further notices that may be provided in the Action. Upon full compliance
2 with these directions, such Nominees may seek reimbursement of their reasonable expenses
3 actually incurred by providing the Notice Administrator with proper documentation supporting
4 the expenses for which reimbursement is sought. The reimbursement to Nominees shall not
5 exceed \$0.02 per name, address, and email address provided to the Notice Administrator; \$0.02
6 per link to the Long Notice actually emailed by Nominees; or \$0.02 plus postage at the current
7 pre-sort rate used by the Notice Administrator per Postcard Notice mailed directly to beneficial
8 owners by Nominees.

9 8. Contemporaneously with the mailing of the Postcard Notice, the Notice
10 Administrator shall cause a copy of the Notices, substantially in the form of Exhibits 1–3 (docket
11 nos. 158-1, 158-2, & 158-3), to be posted on the Notice Administrator’s website,
12 www.JaegervZillowLitigation.com. Ex. 5 at ¶¶ 5, 8 (docket no. 158-5). Class Members will be
13 able to download copies of the Notices. *Id.* at ¶ 8. The case website will also provide an
14 overview of the case and highlight important dates, such as the Exclusion Deadline. The Notice
15 Administrator will also post on the case website the proposed Opt-Out Form.

16 9. The Notice Administrator shall cause a copy of the Summary Notice, substantially
17 in the form of Exhibit 2 (docket no. 158-2), to be published once in *Investor’s Business Daily*
18 and issued once over *Globe Newswire*, each within ten (10) calendar days of the mailing of the
19 Postcard Notice. Ex. 5 at ¶ 5 (docket no. 158-5).

20 10. The Notice Administrator will also maintain a toll-free telephone number and
21 email address that will be staffed with customer service representatives trained to answer
22 questions about the Action. *Id.* at ¶ 8.

23 11. Class Members shall be bound by all determinations and judgments in this
24 Action, whether favorable or unfavorable, unless such persons and entities request exclusion
25 from the Class in a timely and proper manner, as hereinafter provided. A Class Member wishing
26 to be excluded from the Class shall mail a written request by first class mail, postmarked no later
27 than 60 calendar days from the Notice Date, to the address designated in the Notice. Such request
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1 for exclusion shall clearly state that the Class Member requests exclusion from the Class in
2 *Jaeger v. Zillow Group Inc., et al.*, Case No.: 2:21-cv-01551-TSZ, and it must: (i) state the name,
3 address, telephone number, and email address of the person or entity requesting exclusion; (ii)
4 state the number of Zillow securities purchased, acquired, sold, and/or disposed during the Class
5 Period, as well as the dates and prices of each such purchase, acquisition, sale, and/or
6 disposition; (iii) be signed by the person or entity requesting exclusion, or an authorized
7 representative thereof; and (iv) include account documentation reflecting the person or entity's
8 purchase and sale of Zillow securities during the Class Period. The request for exclusion shall
9 not be effective unless it provides the required information and is made within the time stated
10 above, or the exclusion is otherwise accepted by the Court.

11 12. Any Class Member who retains separate counsel in connection with this matter
12 must enter an appearance, as set out in the Long Notice, no later than seventy-five (75) calendar
13 days after the Notice Date. Within eighty (80) calendar days after the Notice Date, Class Counsel
14 will forward to counsel for Defendants any notices of appearance that were mailed to Class
15 Counsel but not filed with the Court.

16 13. Class Counsel shall file with the Court proof of mailing of the Postcard Notice,
17 proof of publication of the Summary Notice, and proof of posting of the Notice on the Notice
18 Administrator's website within ten (10) calendar days following the Summary Notice publication
19 date. Class Counsel shall also file with the Court an affidavit setting forth a list of all persons and
20 entities who have validly and timely requested exclusion from the Class within fourteen (14)
21 calendar days following the expiration of the exclusion deadline.

22 14. At minimum, the Notice Administrator will perform the following tasks to
23 complete adequate notice to Class Members: (1) set up a case website which will host copies of
24 the Long Notice, Summary Notice, Postcard Notice, Opt-Out Form, operative Complaint,
25 relevant Court orders, and all other pertinent information for Class Members; (2) assist in
26 preparing the Long Notice, Summary Notice, Postcard Notice, Opt-Out Form, and the email link
27 to the electronic Long Notice; (3) notify Nominees of the appropriate manner to provide the
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1 Notices to potential Class Members who are beneficial holders; (4) set up a database for Class
 2 Members' information, a phone system, and a frequently asked questions protocol for use by the
 3 Notice Administrator's customer service representatives; (5) perform email verification for all
 4 emails received and perform National Change of Address search for pre-mailings of the Postcard
 5 Notice; (6) disseminate, by email, where possible, or by mailed Postcard Notice, notice to Class
 6 Members who can be identified with reasonable effort; (7) publish the Summary Notice once
 7 over the *Globe Newswire* and once in the *Investors' Business Daily*; (8) perform skip-tracing for
 8 Postcard Notices returned to SCS as undeliverable; (9) update the Class information database to
 9 include updated contact information and other updated information regarding Class Members;
 10 (10) handle and respond to all phone call questions from Class Members; (11) respond to all
 11 other questions via e-mails, letters, and other correspondence from Class Members; (12)
 12 correspond with brokers and institutions to answer any questions and assist with any information
 13 concerning administrative matters regarding the Action; (13) review and process all opt-out
 14 requests; (14) prepare declarations as required by the Court throughout the administration
 15 process; and (15) perform all other actions as directed by Lead Plaintiff's counsel or the Court.
 16 Ex. 5 at ¶ 9 (docket no. 158-5).

17 15. Below is a table of the material notice dates described above.

Event	Date
Order granting stipulation for class notice and summary notice ("Order Date")	Order Date
Zillow or its transfer agent provides security holder records identifying all persons or entities who purchased Zillow securities during the Class Period to the Notice Administrator	21 days after Order Date
Notice Administrator distributes Notices and publishes case website ("Notice Date")	30 days after Order Date

Notice Administrator facilitates publication of the Summary Notice in <i>Investor's Business Daily</i> and in <i>Globe Newswire</i> ("Notice Publication Date")	10 days after Notice Date
Exclusion Deadline	60 days after Notice Date
Appearance Deadline for attorneys acting as separate counsel on behalf of any Class Members	75 days after Notice Date
Class counsel files proof of dissemination of Notices	10 days after Notice Publication Date
Class counsel files affidavit identifying all persons and/or entities who have requested exclusion	14 days after Exclusion Deadline

IT IS SO STIPULATED.

DATED: March 16, 2026

By: /s/ Steve W. Berman

Steve W. Berman, WSBA No. 12536

By: /s/ Catherine Y. N. Gannon

Catherine Y. N. Gannon, WSBA No. 47664

By: /s/ Sean R. Matt

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26 *Additional Counsel for Lead Plaintiff Jaeger*

ORDER

(1) The parties' Stipulated Motion for Approval of Class Notice, docket no. 158, is GRANTED as follows:

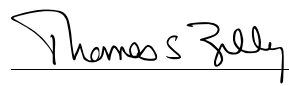
(a) The Court APPROVES Plaintiff's selection of Strategic Claims Services, Inc. as the Notice Administrator, and the parties' proposed Long Notice, Summary Notice, Opt-Out Form, and class notice plan.

(b) The parties' Postcard Notice, Ex. 3 (docket no. 158-3), does not satisfy the requirements of FRCP 23(c)(2)(B)(iv) and (vii). Therefore, paragraph 4 of the Postcard Notice, Ex. 3 (docket no. 158-3 at 4), is MODIFIED to read as follows:

If you are and decide to remain a member of the Class, please visit the website below to register so that if any further notices are disseminated in connection with the Action, you will receive them. Inquiries, other than requests for the Notice, may be made to Class Counsel: Steve W. Berman, Esq., Catherine Y.N. Gannon, Esq., Christopher O'Hara, Esq., Hagens Berman Sobol Shapiro LLP, 1301 Second Avenue, Suite 2000, Seattle, WA 98101. If you are a Class Member, you have the right to decide whether to remain a member of the Class. **If you choose to remain a member of the Class, you do not need to do anything at this time other than to retain your documentation reflecting your transactions in Zillow securities.** You will be represented by Class Counsel appointed by the Court unless you retain your own counsel at your own expense and your counsel enters an appearance on your behalf by _____, 202_. Regardless of whether you appear by your own counsel, if you are a Class Member and do not exclude yourself from the Class, you will be bound by the proceedings in this Action, including all orders and judgments of the Court, whether favorable or unfavorable. You will automatically be included in the Class unless you exclude yourself from the Class.

(2) The clerk is directed to send a copy of this Order to all counsel of record.
IT IS SO ORDERED.

Dated this 2nd day of June, 2026.



Thomas S. Zilly
United States District Judge