April 24, 2014

## VIA ECF

The Honorable Lucy H. Koh United States District Court for the Northern District of California 280 South First Street, #4050, Courtroom 8 – 4th Floor San Jose, CA 95113

Re:

In re High-Tech Employee Antitrust Litigation,

11-cv-2509-LHK (N.D. Cal.)

Your Honor:

Co-Lead Class Counsel and Defendants' Counsel write jointly to inform the Court that Plaintiffs and the remaining Defendants — Adobe Systems Incorporated, Apple Inc., Google Inc., and Intel Corporation — have reached an agreement to settle all individual and class claims alleged in the Consolidated Amended Complaint. The parties have executed a Memorandum of Understanding containing the principal terms of the settlement, and anticipate completing documentation of the proposed Settlement and presenting it for the Court's consideration by May 27, 2014. Accordingly, the parties respectfully request that the Court vacate all pre-trial litigation and trial dates, leaving only the dates associated with settlement approval of the settlements with Intuit, Lucasfilm, and Pixar on calendar.

The parties are available to arrange a telephone conference with the Court if the Court would like additional information. The terms of the Settlement are currently non-public.

Respectfully,

Kelly M. Dermody

Lieff Cabraser Heimann & Bernstein,

LLP

Robert A. Van Nest,

Counsel for Google, Inc.,

on behalf of all Remaining Defendants

Joseph R. Saveri

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