

**All UK-domiciled consumers aged 16 years or over who, between 1 January 2011 and 7 September 2023, purchased goods and/or services from businesses selling in the UK which used search advertising services provided by Google could benefit from collective action**

*Currently resident in the UK? You are already included in the claim.*

*This is a legal notice that has been issued at the direction of the Competition Appeal Tribunal*

- The Competition Appeal Tribunal has decided that an application for a proposed claim filed against Alphabet Inc., Google LLC, Google Ireland Limited and Google UK Limited (collectively “Google”) on behalf of all UK-domiciled consumers aged 16 years or over who, between 1 January 2011 and 7 September 2023 (inclusive), purchased goods and/or services from businesses selling in the UK which used search advertising services provided by Google may proceed as collective proceedings to a full trial. Nikki Stopford has been approved to act as the class representative on behalf of consumers that she claims have suffered loss due to Google’s conduct.
- According to Ms Stopford’s claim, Google has breached competition law in respect of its search advertising services in the UK. Ms Stopford alleges that, as a result of these breaches, UK consumers have been overcharged when they bought goods or services from businesses which used search advertising services provided by Google in the period between 1 January 2011 and 7 September 2023 (inclusive). Ms Stopford seeks compensation from Google on behalf of affected UK consumers.
- The class that Ms Stopford represents comprises:  
*All UK-domiciled consumers aged 16 years or over who, between 1 January 2011 and 7 September 2023 (inclusive), purchased goods and/or services from businesses selling in the UK which used search advertising services provided by Google; together with the personal/authorised representative of the estate of any individual who meets that description and was alive on 7 September 2023 but subsequently died.*
- No money is available now and there is no guarantee that money will be available in the future. The claim will need to be won by Ms Stopford, or settled, before any money can become available.
- You have important legal rights in relation to this claim. Exercising these rights could affect your ability to get a payment in the future (if the case is won or a settlement is reached, and money becomes available). This notice explains the claim, who is covered by the claim,

your rights in relation to the claim, how to exercise these rights, and any related deadlines. Please read this notice carefully as your decisions about this claim will have legal consequences.

- To read the Tribunal’s full Collective Proceedings Order made on 18 December 2024 (“**Order**”), which allows the claim to proceed, see Annex A.

<b>YOUR LEGAL RIGHTS AND OPTIONS</b>	
<b>STAY IN THE CLAIM</b>	If you, or any person whose estate you represent, were living in the UK on 22 November 2024 and fall within the class definition, you do not need to do anything at this time to participate in the claim and are eligible for a share of any money that may become available in the future. However, if you do not “opt-out” of the claim (see below) you give up the right to make your own separate claim against Google for the same legal claims in this case, and you agree to be bound by judgments the Tribunal may issue in this case.
<b>OPT-OUT</b>	If you, or any person whose estate you represent, were living in the UK on 22 November 2024, you have the right to “opt-out” or request to be excluded from the claim by 18 March 2025. By opting-out you keep the right to bring your own separate claim against Google. However, if you opt-out you will not be able to get any money from this claim (if money becomes available). More information on how to opt-out can be found at <a href="http://www.searchclaim.co.uk">www.searchclaim.co.uk</a> and at question 16 below.

## **GENERAL INFORMATION**

### **1. Why has this notice been issued?**

The Competition Appeal Tribunal (“**Tribunal**”) has directed that this notice be issued following the Order being made on 18 December 2024 (see copy at Annex A). The Order allows the claim to proceed as collective proceedings on behalf of eligible UK class members.

This notice has been issued to inform you of important legal rights you have related to this claim. Exercising these rights could affect your ability to get a payment in the future (if money becomes available). This notice explains the claim, who is covered by the claim, your rights in relation to the claim, how to exercise these rights, and any related deadlines. **Please read this notice carefully as your decisions about this claim will have legal consequences.**

### **2. Who is the claim against?**

This claim is against several entities within the Google group of companies: Alphabet Inc., Google LLC, Google Ireland Limited and Google UK Limited. Together, these entities are referred to as “Google”.

### **3. What is Google alleged to have done wrong? What are the claims?**

Ms Stopford alleges that Google has breached European and UK competition law by abusing its dominant position in the search advertising market.

In particular, Ms Stopford alleges that Google acted anti-competitively by (i) tying Google Search with mobile apps and services on Android devices, which in practice forced handset manufacturers to pre-install Google search and browser apps on devices using its Android operating system; and (ii) paying Apple billions to ensure that Google Search was the default

search engine on iPhones and other devices that used Apple’s iOS operating system.

As a result of Google Search being the default search engine for the large majority of mobile devices, Ms Stopford alleges that it has been possible for Google to raise the prices paid by advertisers for prominence on the Google Search page. Therefore, you may have paid higher prices for goods and services bought from advertisers as they passed their increased costs on to you, the consumer.

Ms Stopford alleges that if you are UK-domiciled, aged 16 and over and, between 1 January 2011 and 7 September 2023 (inclusive), you have bought goods or services from businesses selling in the UK which used search advertising services provided by Google, you are entitled to compensation.

#### **4. Who has brought the claim? What is the role of the class representative?**

The Tribunal has authorised Ms Stopford to serve as the class representative for this claim.

As the class representative, Ms Stopford will conduct the claim against Google on behalf of all class members (except those who opt-out of this claim). Ms Stopford will instruct a team of lawyers and experts, make decisions on the conduct of the claim and consider and decide whether to accept any settlement offer that Google may make and present it to the Tribunal for its approval.

In exercising her duties, Ms Stopford will also consult with a consultative group to give her access to a range of independent and experienced advice in relation to the claim. The consultative group members have extensive and relevant expertise in high value, large scale litigation, online advertising, consumer rights and technology matters.

During the proceedings, Ms Stopford is responsible for communicating with the class and for issuing formal notices, such as this notice, to class members. Updates about the claim will be available on the website [www.searchclaim.co.uk](http://www.searchclaim.co.uk) and through the media.

#### **5. Who is Ms Stopford?**

Ms Stopford is a UK-based consumer champion and member of the proposed consumer class. Ms Stopford is a research, content and publishing professional with over 20 years’ experience, and has a background in business, consumer, and public sector policy. She has held a number of executive, non-executive, consultant and expert advisory positions, and has had significant strategic and organisational leadership experience at reputable consumers’ organisations such as Which? and Resolver. Ms Stopford is currently Chair of the British Standards Institute Consumer Forum, a member of the Digit research team at Sussex University and working as an Independent Consultant using research and data to improve consumer and customer experiences.

#### **6. How is the class defined?**

The Consumer Rights Act 2015 (the “Act”) allows for a collective claim to be brought on behalf of a group of individuals who are alleged to have suffered a common loss. The group is the “class” and all individuals within the group are “class members.” As a result of the Act, groups of persons who have all lost out do not need to bring an individual claim to obtain compensation for their loss. Instead, class members may all receive compensation through a single, collective claim brought on their behalf by a representative.

In this case, the Tribunal has decided that the class of persons who can bring a claim is: all UK-domiciled consumers aged 16 years or over who, between 1 January 2011 and 7 September 2023 (inclusive), purchased goods and/or services from businesses selling in the

UK which used search advertising services provided by Google. The class also includes the personal/authorised representatives of the estate of any individual who meets that description and was alive on 7 September 2023, but subsequently died.

This means that you fall within the class if:

- 1) You have, at any time between 1 January 2011 and 7 September 2023 (inclusive), purchased goods and/or services from a business selling in the UK which used search advertising services provided by Google;
- 2) You were resident in the UK for a continuous period of at least three months, as at 22 November 2024; and
- 3) You were aged 16 years or over at the time of making the purchases.

These 3 conditions are cumulative.

Where an individual met those requirements and was alive on 7 September 2023, but subsequently passed away, that person's personal representative is the relevant class member.

Further details regarding the requirements for eligibility as class members (and any applicable exclusions from the class, which includes any members of Ms Stopford's or Google's legal teams, and anyone assigned to determine the claim) can be found on the website set up by Ms Stopford at [www.searchclaim.co.uk](http://www.searchclaim.co.uk), and additional information can be found under "*Am I part of the class?*" below.

#### **7. What is an opt-out claim? What is the "domicile date"?**

This claim is proceeding as an opt-out claim. In simple terms, if you do not opt-out (i.e. ask to be excluded), you are part of the claim. This process means that, if you – or the person whose estate you represent - were living in the UK as at 22 November 2024 (known as the "domicile date") and you fall within the class definition, you are included in the class (and do not need to do anything) unless you ask to be excluded from the class.

All class members who stay in the class will be bound by any judgment of the Tribunal. As a class member, you will not be able to bring an individual claim against Google raising the same issues included in this claim.

This notice explains how to opt-out of the class at question 16 below.

#### **8. How much money does the claim ask for?**

The claim seeks compensation for all those within the class who have been affected by Google's allegedly anti-competitive behaviour. The total aggregate amount sought is currently estimated to be approximately £7 billion (excluding interest). If the claim is successful, all persons who fall within the class and have not opted out will be able to seek their share of the compensation obtained.

Visit [www.searchclaim.co.uk](http://www.searchclaim.co.uk) for more details about the amount of compensation that you may receive in due course.

#### **9. How do I get a payment?**

No money is available now and there is no guarantee that money will be available in the future. The case will have to be won in the Tribunal unless a settlement can be agreed between the class representative (on behalf of the class) and Google and approved by the Tribunal.

**Questions? Visit: [www.searchclaim.co.uk](http://www.searchclaim.co.uk)**

The court process can take time, so please be patient. If, and when, money becomes available, class members will be notified about how to obtain a payment. Please register at [www.searchclaim.co.uk](http://www.searchclaim.co.uk) and you will be kept up to date.

## **10. What is the Competition Appeal Tribunal?**

The Competition Appeal Tribunal is a specialist court based in London that covers the whole of the UK and hears disputes concerning the application of competition law, including collective proceedings such as these. The Tribunal publishes its Rules and Guidance, together with information about what it does, on its website [www.catribunal.org.uk](http://www.catribunal.org.uk).

A summary of the claim against Google can also be found on the Tribunal's website at [www.catribunal.org.uk/cases/16067723-nikki-stopford](http://www.catribunal.org.uk/cases/16067723-nikki-stopford).

## **WHO IS IN THE CLASS**

### **11. What does it mean to be a class member?**

As a class member (provided you have not opted out), if money becomes available following a trial or settlement, you will be eligible to claim a share of the money. You will also be legally bound by all Tribunal judgments with respect to this claim. Whether Ms Stopford wins money for the class or not, unless you opt-out, you will never be able to bring your own separate claim against Google in respect of the claims included in this case.

### **12. Am I part of the class?**

The class includes only those who meet the class definition (see “How is the class defined?” above and “Am I domiciled in the UK?” below).

If you fit these conditions, you are automatically within the class unless you ask to be removed from the class (See “How to Opt-Out” below).

### **13. Am I domiciled in the UK?**

For this case, an individual is considered to be domiciled in the UK if they have been continuously living in England, Wales, Scotland or Northern Ireland for at least three months.

### **14. What if I am a UK resident and move outside the UK after 22 November 2024?**

If you – or any person whose estate you represent – move outside the UK after 22 November 2024, you should keep some documents showing that you were a UK resident on 22 November 2024. If money becomes available in the future and you are living outside of the UK at that time, then you may need to show that you were a UK resident on 22 November 2024 to receive your payment.

### **15. I am not sure if I am included in the class.**

If you are not sure whether you are included in the class, visit [www.searchclaim.co.uk](http://www.searchclaim.co.uk) to review the Order, and to find answers to frequently asked questions (FAQs) and other documents which can help you to determine whether you are part of the class.

## HOW TO OPT-OUT

### 16. I am a UK resident on 22 November 2024 and I want to be removed from the class.

If you are a UK resident on 22 November 2024 and you want to be removed from the class, you must send a communication by post or electronically to Ms Stopford's claims administration providers, Epiq Systems by 18 March 2025 explicitly requesting to be excluded.

Send a letter by post to:

Search Claim Administrator  
P.O. Box 1435  
Sunderland, SR5 9UD

Alternatively, email the following email address: [forms@searchclaim.co.uk](mailto:forms@searchclaim.co.uk).

Include the following statement in your communication **"I want to opt-out of the UK collective claim against Google, Case No. 1606/7/7/23,"** along with your full name, postal address, email address and telephone number. You do not have to give a reason for opting out. Visit [www.searchclaim.co.uk](http://www.searchclaim.co.uk) to download a template letter to assist with this process.

For postal communications to be processed, your opt-out communications must be received or postmarked by 18 March 2025. Once your opt-out letter is received and processed, you will be sent an acknowledgement by email if you have provided an email address, or by post if not.

By opting out, you will not be able to claim a share of any compensation that becomes available. However, you may be able to bring your own separate claim against Google in relation to the same issues.

## GETTING MORE INFORMATION

### 17. How can I stay updated on the progress of the claim?

You can visit [www.searchclaim.co.uk](http://www.searchclaim.co.uk) and register to receive updates and any future notices via email as the claim progresses. If, and when, any money becomes available, you will be contacted with information on how to claim your share.

### 18. How can I get more information?

This notice summarises the Order. To read the full Order (also in Annex A) and see other information about the claim, visit [www.searchclaim.co.uk](http://www.searchclaim.co.uk).

# ANNEX A

REGISTERED AT THE COMPETITION APPEAL  
TRIBUNAL  
UNDER NUMBER: 20738  
DATE: 18/12/24



**IN THE COMPETITION  
APPEAL TRIBUNAL**

Case No: 1606/7/7/23

BETWEEN:

**NIKKI STOPFORD**

Class Representative

- v -

**(1) ALPHABET INC.**

**(2) GOOGLE LLC**

**(3) GOOGLE IRELAND LIMITED**

**(4) GOOGLE UK LIMITED**

Defendants

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## ORDER

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**UPON** receipt of the Class Representative’s application for a Collective Proceedings Order pursuant to section 47B of the Competition Act 1998 (the “**Act**”) and Rule 75 of the Competition Appeal Tribunal Rules 2015 (the “**Tribunal Rules**”) (the “**CPO Application**”) filed on 7 September 2023.

**AND UPON** the Defendants’ application to strike out the Class Representative’s claims and/or for summary judgment, dated 24 May 2024 (the “**Strike Out Application**”)

**AND UPON** hearing Leading Counsel for the Class Representative, and Leading Counsel for the Defendants, at the hearing of the CPO Application on 18 and 19 September 2024.

**AND UPON** the Tribunal having handed down judgment on the CPO Application and the Strike Out Application on 22 November 2024.

**AND UPON** the Tribunal having decided in accordance with Rule 78 of the Tribunal Rules that it would be just and reasonable for the Applicant to act as class representative in the collective proceedings

**AND UPON** the Tribunal having decided in accordance with Rule 79 of the Tribunal Rules that the claims as described in the CPO Application are eligible for inclusion in collective proceedings

**IT IS ORDERED THAT:**

**A. FORUM**

1. Pursuant to Rules 18, 52 and 74 of the Tribunal Rules, the present collective proceedings be treated as proceedings in England and Wales.

**B. AUTHORISATION OF THE CLASS REPRESENTATIVE AND CERTIFICATION OF THE CLAIMS AS ELIGIBLE FOR INCLUSION IN COLLECTIVE PROCEEDINGS**

2. Pursuant to section 47B of the Act and Rules 77 and 80 of the Tribunal Rules, Nikki Stopford be authorised to act as Class Representative to continue the present collective proceedings on an opt-out basis.
3. The Class Representative's address for service is Hausfeld & Co. LLP, 12 Gough Square, London EC4A 3DW (hard copy) or [HausfeldStopfordClaim@hausfeld.com](mailto:HausfeldStopfordClaim@hausfeld.com) (copied to [lstreatfeild@hausfeld.com](mailto:lstreatfeild@hausfeld.com) and [sbishop@hausfeld.com](mailto:sbishop@hausfeld.com)) (email).
4. The claims certified as eligible for inclusion in the present collective proceedings pursuant to section 47B of the Act and Rules 79 and 80 of the Tribunal Rules are claims for damages for loss suffered by the Class (as defined below) as a result of the Defendants' breaches of statutory duty in infringing: (i) section 18 of the Act; and (ii) until 31 December 2020, Article 102 of the Treaty on the Functioning of the European Union.

**C. CLASS DEFINITION**

5. The class is defined as follows (hereafter the "Class" and the "Class Definition"):



**All UK-domiciled consumers aged 16 years or over who, between 1 January 2011 and 7 September 2023 (inclusive), purchased goods and/or services from businesses selling in the UK which used search advertising services provided by Google, together with the personal/authorised representative of the estate of any individual who meets that description and was alive on 7 September 2023 but subsequently died.**

6. For the purposes of the Class Definition, the following persons are excluded:
  - (a) Officers, directors, or employees of any of the Defendants, their holding companies, their subsidiaries, and any entity in which any of the Defendants has a controlling interest;
  - (b) All members of the Class Representative's and the Defendants' legal teams and all experts or professional advisers instructed and retained by them, and all funders or insurers involved in connection with these proceedings; and
  - (c) All members of the Tribunal panel assigned to these proceedings and any judge hearing any appeal in these proceedings.
7. The Class Representative may apply to amend the Class Definition at a later stage to include within the Class UK-domiciled consumers who, post 7 September 2023 (but not before) and prior to the date of such amendment, made purchases of goods and/or services from businesses selling in the UK which used search advertising services provided by Google.

**D. DOMICILE DATE AND OPT-OUT**

8. The Domicile Date is 22 November 2024. Every person falling within the description of the Class who is domiciled in the United Kingdom on the Domicile Date shall be included in these collective proceedings subject to paragraph 9 below.
9. Persons satisfying the Class Definition who are domiciled within the United Kingdom on the Domicile Date may opt-out of these collective proceedings by writing to the

Claims Administrators appointed on behalf of the Class Representative (“Epiq”), by 18 March 2025, with such communications to be submitted by post or electronically.

**E. PUBLICATION**

10. The Class Representative shall publicise this Collective Proceedings Order in accordance with the draft Rule 81 Notice annexed to the Collective Proceedings Claim Form and the proposal set out in Section 8 of the Notice and Administration Plan which is annexed to the First Witness Statement of Nikki Stopford.

**F. STRIKE OUT APPLICATION**

11. The Defendants’ Strike Out Application is dismissed.

**G. DIRECTIONS**

12. The Defendants shall file and serve a consolidated Defence to the Amended Collective Proceedings Claim Form by 4pm on 26 February 2025.
13. The Class Representative shall file and serve a Reply, if so advised, by 4pm on 23 April 2025.
14. A Case Management Conference shall be listed on the first available date following 21 May 2025 before Mr Justice Meade.

**H. COSTS**

15. The Defendants shall pay to the Class Representative the sum of £750,000 (inclusive of VAT) in full and final settlement of her costs of and occasioned by the Defendants’ opposition to the CPO Application (including but not limited to the costs of and occasioned by the Strike Out Application).
16. The Defendants shall pay to the Class Representative the costs in paragraph 15 within 30 days of this Order being made.

17. All remaining costs of the Class Representative incurred to date shall be costs in the case, save for the costs of and occasioned by the Class Representative's amendments to the Claim Form and ancillary documents which are the subject of paragraph 18 of the Tribunal's Order dated 12 April 2024.
  
18. There be liberty to apply.

*R. Meade*

The Honourable Mr Justice Meade  
Chair of the Competition Appeal Tribunal

Made: 18 December 2024

Drawn: 18 December 2024