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SUBJECT: Proposed Methodology for Settlement Distribution

DATE: August 2026

1 Introduction

We have been asked to consider a methodology for the distribution of a settlement between Google and to the individual developers that are part of the Rodger class.

This settlement distribution methodology proposal is based on Professor Fletcher's preferred methodology for damages applied in Fletcher 3 (and consistent with her Trial Report). The damage calculations in Fletcher 3 were done on an aggregate basis, and settlement distribution will need to be done on an individual developer basis.

To simplify the calculations, we have not accounted for pass-on, simple interest or the additional off app-store damages.[1] We also note that, consistent with Fletcher 3, we are calculating settlement payments and the individual developer share of the settlement based on each developer's revenue, where developer revenue = total transaction revenue - Google's service fee.

2 Allocation based on developer's transactions

On an individual developer basis, the settlement can be allocated amongst claimants efficiently by reference to each developer's share of the calculated damages under Fletcher 3, with that share then applied to the amount of the settlement fund available for developer claims. For smaller claims, a simplified payment structure can be used instead. The proposed methodology is as follows:

- **Step 1: Calculate aggregate damages**

  Extrapolate the Rodger UK Transaction data from its current cut-off in March 2025 through to 31 July 2026 and calculate the resulting aggregate damages in accordance with the Fletcher 3 methodology. These aggregate damages will be used as the denominator when calculating the pro-rata share of the settlement attributable to developers requiring an individual calculation.

- **Step 2: Identify and verify each developer**

  Each claimant will provide its developer ID. The developer ID will be used to match the claimant against the Rodger UK Transaction data and identify the transactions attributable to that developer during the period covered by the actual transaction data. Where a developer cannot be matched to the Rodger UK Transaction data – for example if that developer only made sales after the Rodger UK Transaction data cut-off in March 2025 – or disputes the transactions

[1] Note that this is not a neutral factor: in Prof Fletcher's methodology, some types of developer were more likely to pass-on their costs than others. Developers with proportionately greater transactions in the earlier part of the Relevant Period would in principle benefit more from including interest. Those developers who are more likely to have sold through direct sales channels in Prof Fletcher's counterfactual may also have suffered more loss.

attributed to it, further supporting information may be requested from the developer, including relevant financial reports from the developer's Google Play Console.[2] This would also include indications if the developer was part of any special commission programs with Google.

- **Step 3: Extrapolate each developer's transactions**

For the period after the cut-off of the actual Rodger UK Transaction Data, the developer's position will be extrapolated using its share of the transactions in the pre-extrapolation period.

In particular, the developer's share during the period for which actual transaction data is available will be calculated and projected forward through to 31 July 2026 on a constant-share basis, meaning that its share of damages in the class period is assumed to remain unchanged over the extrapolation period.[3] This allows the extrapolated portion of the developer's claim to remain anchored to its actual observed transaction activity in the Rodger UK Transaction Data, rather than requiring the developer to submit additional transaction data for the extrapolation period.

- **Step 4a: Simplified payments for smaller developers**

Once the claimant has provided its developer ID, the developer's revenue can be determined from the Rodger UK Transaction Data, together with the extrapolation described above. Table 1 groups developers by revenue band and summarises their average claim value and average settlement sum based on a £160 million class pot.

Prof Rodger proposes that developers with total Play Store revenues of £7,500 or less between 22 August 2018 – 31 July 2026, will receive a lump-sum payment of £200, unless they choose to have an individually calculated pro-rata payment. As can be seen from the splits in Table 1, £200 exceeds the average claim value for each sub-band.

The approach to individual calculations is outlined in Step 4b.

- **Step 4b: Individual damages calculation**

Prof Rodger proposes that, for developers with revenues of £7,500 or over, and for smaller developers who request an individual calculation, Fideres will calculate damages using the transactions attributable to that developer in the Rodger UK Transaction data, together with the extrapolation described in Step 3.

The calculation will apply the Fletcher 3 methodology to the developer's own transactions and will therefore take account of the developer's actual effective commission rate. Damages will be calculated only where the effective commission paid exceeds Professor Fletcher's preferred counterfactual commission rate[4]. Where the calculated damages for a transaction or relevant period would otherwise be negative because the developer's effective commission rate was

[2] See https://support.google.com/googleplay/android-developer/answer/6135870?hl=en#zippy=%2Cdetailed-reports%2Caggregated-reports and https://support.google.com/googleplay/android-developer/answer/2482017?hl=en.

[3] Limiting the constant share based only on the most recent 12-month period produces a somewhat more top-heavy distribution, with the allocation more concentrated to the largest developers. The resulting redistribution is otherwise limited, with developers at the lower end of the distribution receiving broadly the same amounts under both approaches. We have opted to use an approach that uses all the available data as we believe it will more accurately predict future performance.

[4] Prof. Rodger and Google are not asserting that any such counterfactual rate is appropriate (nor making any admissions in this regard), but it is being adopted for the purposes of the settlement distribution only.

below Professor Fletcher's preferred counterfactual commission rate, the damages will be floored at zero. Accordingly, only positive amounts will contribute to the developer's damages calculation.

The resulting individual damages figure will then be divided by the aggregate damages calculated in Step 1 to determine that developer's percentage share of the overall settlement sum.

- **Step 4c: Provisional assessment and developer review**

Once a developer has been identified using the Rodger UK Transaction Data, it will be provided with a provisional assessment of its entitlement based on the Rodger UK Transaction Data and the methodology described above. For developers falling within Step 4a, this will identify the associated fixed payment. For developers falling within Step 4b, it will identify the transactions attributed to the developer and the resulting individual damages calculation.

The developer will have a specified period in which to accept that assessment or raise a query and provide supporting information if it considers that the underlying transaction data or calculation is incomplete or inaccurate. Fideres will review any such information and make any necessary adjustments.

Following expiry of the claims and review periods, Fideres will determine the damages attributable to all verified claimants, including any developers who could not initially be matched to the Rodger UK Transaction Data and any adjustments made following the review process. Those additional or adjusted damages will be incorporated into the aggregate damages calculation in Step 1, so that the denominator used to determine individual developers' shares reflects all verified claims.

- **Step 5: Calculate the settlement payment**

Once the claims and review periods have closed and the aggregate damages calculation has been updated as described in Step 4c, each developer's settlement payment will be calculated.

For developers receiving an individual assessment under Step 4b, the developer's final percentage share of the aggregate damages will be applied to the settlement fund available for developer claims.[5] Small developers proceeding under Step 4a will receive the fixed payment applicable to their revenue band.

Before payments are made, Fideres will undertake a final reconciliation to ensure that the aggregate amount payable to verified claimants does not exceed the settlement fund available for developers. If the calculated payments would exceed that fund, Prof Rodger proposes that the payments other than the fixed payments under Step 4a be reduced proportionately so that the total amount paid does not exceed the available fund.

[5] Based on the current estimates underlying Table 1, the 24 largest developers by modelled claim value are presently estimated to receive individual settlement payments in the region of [redacted] based on a £160 million settlement pot.

3 Appendix

3.1 Extrapolated Class Size Estimate

The class size of [redacted] developers estimated by Professor Fletcher in Fletcher 3, is based on the number of developers with at least one qualifying transaction between 22 August 2018 and 22 August 2024. After August 2024, a further [redacted] developer IDs appear in the Rodger Transaction Data up to March 2025. These developer IDs account for around [redacted] of relevant developer revenue. Extrapolating this activity through to July 2026 gives an aggregate developer revenue of around [redacted].

To estimate the number of additional developer IDs that may have entered after March 2025, we assume that they continue to enter at this same monthly rate. The [redacted] developer IDs observed over the seven complete months from September 2024 to March 2025 averages [redacted] per month. Applying this rate over the 16 months from April 2025 to July 2026 gives a further [redacted] developer IDs. This implies an estimated total of [redacted] additional developer beyond the [redacted] developers identified by Professor Fletcher, and an overall population of approximately [redacted] developers.

3.2 Methodology for allocating revenue to additional developers

We estimate the total revenue generated by the post-cut-off developers through July 2026. We then use the [redacted] developers for whom we have actual revenue data to decide how that total should be divided between the estimated [redacted] developers.

In simple terms, we assume that the [redacted] developers contain a similar mix of smaller and larger developers to the [redacted] developers we observe. We use the revenues of those [redacted] developers as the template for assigning revenue to the wider group.

Finally, all of the assigned revenues are adjusted by the same percentage so that, when added together, they equal our estimate of total post-cut-off revenue. This gives an estimated revenue for each of the [redacted] developers while keeping the overall revenue estimate unchanged

3.3 Extrapolated Developer revenue ranges

Table 1: Extrapolated Revenue ranges, average claim values and average settlement sums*

#	Extrapolated Revenue Range	# Devs	Average claim value	Average settlement sum	Cumulative settlement sum**	Reverse of column (f)***
(a)	(b)	(c)	(d)	(e)	(f)	(g)
Top 5	[redacted]					
Next 20						
Next 25						
Next 50						
Next 100						
Next 200						
Next 300						
Ranks 701-1500						
Ranks 1,501 - 13,946						

Source: Rodger UK Transaction data, Fideres calculations.

Notes: *Assumes a £160m settlement pot for developers and an aggregated claim value of [redacted]. The extrapolated developer class and revenue figures are inclusive of opt-outs. **If all developers took the average settlement in their revenue range. ***Counts the cumulative sum from the bottom group (ranks [redacted]) up.