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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF SANTA CLARA**

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| GILBERT LUNA, et al.,  Plaintiffs,  v.  GOOGLE LLC,  Defendant. | Case No. 24CV434093  Related Google LLC Cases Involving Incognito Mode  COMPLEX - ASSIGNED FOR ALL PURPOSES TO:  Honorable Charles F. Adams, Department 7  PLAINTIFFS' MEMORANDUM IN OPPOSITION TO DEFENDANT GOOGLE LLC'S MOTION FOR SUMMARY JUDGMENT  Date: June 16, 2025  Time.: 1:30 p.m.  Dept.: 7  Action Filed: March 28, 2024  Trial Date: June 24, 2025 |

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# ARGUMENT

## Plaintiffs’ Factual Allegations Are Sufficiently Detailed.

### Plaintiffs’ allegations satisfy California’s pleading standard.

# V.

For the reasons above, Plaintiffs respectfully request that the Court deny Google’s motion for summary judgment in full.

Dated: May 27, 2025 Respectfully submitted,

By: */s/ [DRAFT]*

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