

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ADRIAN CENDEJAS, on behalf of himself
and all others similarly situated,

Plaintiffs,

v.

SONY INTERACTIVE ENTERTAINMENT
LLC,

Defendant.

Case No. 3:21-cv-03361-AMO

**DECLARATION OF ELAINE PANG IN SUPPORT OF PLAINTIFF'S PRELIMINARY
APPROVAL MOTION AND NOTICE PLAN**

I, Elaine Pang, hereby declare as follows:

1. I am the Vice President of Media with A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data"). I respectfully submit this Declaration at the request of Interim Lead Counsel in connection with the above-captioned action (the "Action").

2. This Declaration is based upon my personal knowledge of and information provided by Interim Lead Counsel, my associates, and A.B. Data staff members. The information, methods, and tools used in developing the notice plan are of a type reasonably relied upon in the fields of media, advertising, and communications. My *curriculum vitae* is attached as **Exhibit A**.

3. A.B. Data has been appointed as notice, claims, and/or settlement administrator in hundreds of high-volume consumer, antitrust, securities, ERISA, insurance, and government agency cases. A profile of A.B. Data's background and capabilities, including representative case and client lists, is included as **Exhibit B**.

4. This Declaration will describe the proposed notice plan for the Action (“Notice Plan”) and how it will meet Rule 23 of the Federal Rules of Civil Procedure (“Rule 23”) and due process requirements. The objective of the Notice Plan is to provide the best practicable notice, under the circumstances, to Settlement Class members who are defined as follows:

All persons in the United States who purchased through the PlayStation Store one or more video games for which a GSV was available at retail prior to April 1, 2019, for which a total of at least 200 GSV redemptions were made prior to April 1, 2019, and for which the post-discount price increased by at least fifty cents from: (a) the period between January 1, 2017 and March 31, 2019; as compared to (b) the period between April 1, 2019, and December 31, 2023. The class period shall be April 1, 2019, to December 31, 2023 (“Class Period”).

5. The Notice Plan includes direct notice effectuated to Settlement Class members through direct (email) and paid and earned media notice. A dedicated case-specific website and toll-free telephone line will complement the Notice Plan and serve as additional resources for Settlement Class members. More information about these components is detailed below.

DIRECT NOTICE

6. A.B. Data understands that Settlement Class members’ email addresses are available through Sony Interactive Entertainment LLC (“SIE”) and can be reasonably relied upon to provide notice. It is my understanding that SIE previously sent emails to PlayStation Network (“PSN”) account holders with a bounce back rate of 10% or less which demonstrates that SIE has robust direct contact information readily available. PSN account holders and digital game purchasers are presumably computer savvy and thus reachable by email given their purchases through the PlayStation Store. Thus, sending notice to these users through the email addresses associated with their PSN accounts, which were provided when establishing a PSN account (which is required to purchase from the PlayStation Store), would directly reach as many potential

Settlement Class Members as possible. This direct email notice, coupled with paid and earned media notice, would, therefore, be the best notice practicable under the circumstances.

7. As such, A.B. Data will provide robust direct notice via the email addresses associated with the PSN accounts of Settlement Class members. A.B. Data will send an email notice to all known Settlement Class member email addresses. The direct email notice will substantially be a version of the Short-Form Notice, attached as **Exhibit C**, and will direct Settlement Class members who would like to opt out of or object to the Settlement to the case-specific website.

8. Prior to emailing, A.B. Data will perform several tasks to maximize email deliverability. These tasks include running the list of recipient email addresses through a deliverability analysis to ensure the email addresses are valid and working with our email service providers to develop transmittal strategies to achieve optimal deliverability. A.B. Data will also incorporate best practices, such as excluding words or phrases known to trigger SPAM or junk filters, not including email attachments, and sending the emails in tranches over a period of days or weeks.

9. Settlement Class members whose email addresses are no longer valid or whose PSN accounts are deactivated, and who receive notice via paid (or earned) media, may contact A.B. Data through the case-specific toll-free telephone line, email address, or mailing address if they want to claim a payment from the Settlement. They will be asked to provide information about their previous PSN account, including purchase confirmation, their updated contact information, and a valid mailing address.

Paid Media Components

10. Paid media, including print and digital advertising, will supplement the aforementioned direct notice and reach those who do not receive a Short-Form Notice by email. Paid media advertising is guaranteed to appear and allows control over the content, timing, and positioning of the message.

Print

11. A.B. Data will publish the Short-Form Notice in the form of a Publication Notice. The Publication Notice will appear once as a full-page advertisement in the monthly magazine *PC Gamer* (with a circulation of 158,767).¹

Digital Media

12. Digital advertising allows the viewer to click on an ad and instantly view the case-specific website to obtain additional information about their rights. The Notice Plan includes digital advertising to reach potential Settlement Class members.

13. Digital banner ads will appear on targeted gaming-related websites such as wired.com, pcgamer.com and many more. An estimated 1.5 million gross impressions² will be delivered across desktop, tablet, and mobile devices for 30 days.

14. All banner ads will include images appropriate for this case and an embedded link to the case-specific website to increase the ad visibility and click-through rate.

¹ Publications have the right to refuse advertisements. A.B. Data will make every effort to have the Publication Notice placed in *PC Gamer* but will make substitutions as necessary.

² Gross (targeted) impressions are the duplicated sum of audiences of all media vehicles containing the notice.

Keyword Search Sponsorships

15. To make it easy for potential Settlement Class members to locate the case-specific website, sponsored search listings will be purchased to appear on Google, the most highly visited search engine, and/or other search partners. When a person uses a specific target phrase and/or keyword in a search engine to search for information, the link to the case-specific website may appear near the top of the search result pages.

Earned Media

16. In addition to direct and paid media notice, A.B. Data will distribute a news release via *PR Newswire's* US1 Newswire. The news release will reach traditional media outlets (television, radio, newspapers, magazines), news websites, and journalists across the United States. Although there is no guarantee that any news stories will result, the news release will serve a valuable role by providing additional notice exposures beyond what will be provided by the paid media.

17. A.B. Data will also share information about the case with its followers on X.

Toll-Free Telephone Number

18. A.B. Data will establish and maintain a case-specific toll-free telephone number to address potential Settlement Class Member inquiries. The toll-free telephone number is equipped with an automated interactive voice response system that presents callers with a series of choices to hear prerecorded information. If callers need further help, they have the option to speak with a live operator during business hours. After business hours, callers may leave a voicemail message, and their call will be returned the following business day. The toll-free telephone number will be prominently displayed on the Notices and the case-specific website.

Settlement Website

19. A.B. Data will establish and maintain a dedicated case-specific Settlement website to ensure Settlement Class members can easily access current information about this Action and Settlement. The website will provide, among other things, a downloadable version of the Long-Form Notice is attached as **Exhibit D**, a case summary, Settlement Class member rights and options, relevant documents, important dates, and any pertinent updates concerning the Action. The case-specific website will be secure, with an “https” designation. The website address will appear on the Notices.

Notice Design

20. The Notices are designed to be noticed, reviewed, and – by presenting the information in plain language – understood by Settlement Class members. The notice design follows the principles embodied in the Federal Judicial Center’s (“FJC”) illustrative model notices posted at www.fjc.gov. Many courts have approved similarly written and designed notices. The Notices contain substantial, easy-to-read summaries of all key information about Settlement Class members’ rights, including the ability to opt out and the deadline to do so. Consistent with our normal practice, all Notices will undergo a final edit for grammatical errors and accuracy prior to actual emailing and publication.

EXCLUSION PROCESSING

21. The Long-Form Notice includes specific instructions on how to request exclusion from the Settlement Class. A.B. Data will receive, process, and report all exclusion requests and promptly circulate copies to Interim Lead Counsel.

DATA SECURITY

22. A.B. Data has numerous control systems and procedures in place, that it believes meet or exceed relevant industry standards, to securely handle class member data. A summary of those systems and procedures, addressing the items highlighted in the updated Northern District of California Procedural Guidance for Class Action Settlements (including technical, administrative, and physical controls; retention; destruction; audits; crisis response; etc.), is attached as **Exhibit E**.

23. A.B. Data accepts responsibility for the security of Settlement Class member information and claimant data; accurate calculation of claims pursuant to a Court-approved plan of allocation, subject to the guidance of the parties; and accurate distribution of funds pursuant to relevant Court Orders. All case data provided to A.B. Data by the parties and/or Settlement Class members will be used solely for the purpose of effecting notice and settlement administration. A.B. Data will not use any Settlement Class member information for any other purpose; specifically, the information will not be used, disseminated, or disclosed by or to any other person for any other purpose.

24. A.B. Data maintains adequate insurance in the case of errors, which includes: (a) professional liability errors and omissions insurance coverage; (b) a fidelity bond for employee dishonesty losses (plus additional computer fraud and wire transfer communication fraud coverages); and (c) network and information security liability coverage.

PROJECTED PAYMENT AMOUNT

25. A.B. Data has experience with numerous class actions where large numbers of consumers were involved. Given the sizeable number of potential Settlement Class members in this Action, Settlement Class members are expected to receive an average payment ranging from

\$0.91 to \$33.66, after netting for fees, costs, expenses, and service awards. Estimated payment amounts may vary based on the final Net Settlement Fund pursuant to the Settlement Agreement and the final costs and awards approved by the Court.

FEES

26. Based on the defined scope of work provided by Interim Lead Counsel, A.B. Data has estimated the notice costs will be \$150,000 to \$175,000.

27. A.B. Data's estimated fees and charges are based on certain information provided to A.B. Data by the parties, and certain assumptions. Accordingly, the estimate is not intended to limit A.B. Data's actual fees and charges, which may be less or more than estimated due to the scope of actual services or changes to the underlying facts or assumptions.

CONCLUSION

28. It is my opinion that the proposed Notice Plan is adequate and reasonable and will effectively reach the Settlement Class members. This plan, including robust direct email, print, digital advertising, and earned media, will reach over 70%³ of the Settlement Class. The proposed Notice Plan conforms to the standards employed by A.B. Data in similar notification plans. The proposed Notice Plan, as designed, is fully compliant with Rule 23 of the Federal Rules of Civil Procedure.

³ This reach is within the range that the Federal Judicial Center's *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide* recommends and considers reasonable. It states: "The lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the class. It is reasonable to reach between 70-95%."

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26th day of February 2026.

A handwritten signature in black ink, appearing to be 'EP' with a long horizontal stroke extending to the right.

Elaine Pang

EXHIBIT A

Elaine Pang is Vice President of Media with A.B. Data’s Class Action Administration division and has over eighteen years of expertise in development of legal notice plans. She has directed a wide range of notice programs involving media planning, media buying, research, creative design process, and data analysis, resulting in the implementation of effective and efficient programs to reach potential class members. Ms. Pang has been involved in some of the largest and most complex legal notification plans in both domestic and international regions. Her programs satisfy due process requirements, as well as all applicable state and federal laws, and they adhere to the guidelines set forth in the *Manual for Complex Litigation, Fourth Edition* and by the Federal Judicial Center (FJC), as well as applicable state laws.

Ms. Pang is also a certified professional in IAB Digital Media Buying & Planning, IAB Media Sales, Hootsuite Social Marketing, Google Digital Sales, Google Analytics, Google AdWords, and Market Motive Internet Marketing Fundamentals. She also served as an IAB exam committee member, a group of 12-14 industry experts who work to ensure that certification exams stay current with the industry’s changing ecosystem by developing exam questions, reviewing exam content, and advising on the passing score of the exam. She holds a Bachelor of Science in marketing from The Pennsylvania State University and earned her MBA from Strayer University.

Prior to her professional experience in the class action notice and claims administration industry, Elaine established a strong portfolio working with many top brands including Marriott, General Mills, Air Wick, Jet-Dry, Comedy Central, Madison Square Garden, Radio City Music Hall, and Geox.

CASE EXPERIENCE

Ms. Pang has been instrumental in her involvement with developing, implementing, and analyzing media measurements across domestic and international multichannel platforms for notice programs. A partial listing of her case work is provided below.

CASE NAME	CASE NUMBER	LOCATION
<i>Ray v. NCAA</i>	1:23-cv-00425	United States District Court for the Eastern District of California
<i>National ATM Council, Inc., et al. v. Visa, Inc., et al.</i>	1:11-cv-01803-RJL	United States District Court for the District of Columbia
<i>State of Utah, et al. v. Google LLC, et al.</i>	3:21-cv-05227-JD	United States District Court for the Northern District of California
<i>Hubbard v. Google</i>	5:19-cv-07016	United States District Court for the Northern District of California

<i>Dennis, et al. v. The Andersons, Inc., et al.</i>	1:20-cv-04090	United States District Court for the Northern District of Illinois
<i>Othart Dairy Farms, LLC v. Dairy Farmers of America, Inc., et al.</i>	22-cv-00251- SMD-DLM	United States District Court for the District of New Mexico
<i>DZ Reserve, et al. v. Meta Platforms, Inc.</i>	3:18-cv-04978	United States District Court for the Northern District of California
<i>In re Generic Pharmaceuticals Pricing Antitrust Litigation</i>	2:16-MD-02724	United States District Court for the Eastern District of Pennsylvania
<i>Jien v. Perdue Farms</i>	1:19-cv-002521	United States District Court for the District of Maryland
<i>Frasco v. Flo Health Inc.</i>	3:21-cv-00757	United States District Court for the Northern District of California
<i>Ruffin v. CVS Pharmacy, Inc.</i>	23-CV-01660-BO-RN	United States District Court for the Eastern District of North Carolina Southern Division
<i>Borozny, et al. v. RTX Corp., Pratt & Whitney Division, et al.</i>	3:21-cv-1657-SVN	U.S. District Court for the District of Connecticut
<i>Leventhal v. Bayside Cemetery and Congregation Shaare Zedek</i>	Index No. 100530/11	Supreme Court of the State of New York
<i>Oliver v. Am. Express Co.</i>	19-CV-566	U.S. District Court for the Eastern District of New York
<i>In re Turkey Antitrust Litigation</i>	1:19-cv-08318	United States District Court for the Northern District of Illinois
<i>In re California Bail Bond Antitrust Litigation</i>	4:19-CV-00717-JST	United States District Court for the Northern District of California
<i>Russo, et al. v. Walgreen Co.</i>	1:17-cv-02246	United States District Court for the Northern District of Illinois
<i>In re Platinum and Palladium Antitrust Litigation</i>	1:14-cv-9391 (GHW)	U.S. District Court for the Southern District of New York
<i>In re: National Prescription Opiate Litigation</i>	1:17-md-2804	United States District Court for the Northern District of Ohio
<i>Mackmin, et al. v. Visa Inc., et al.</i>	1:11-cv-01831 (RJL)	United States District Court for the District of Columbia
<i>In re Effexor XR Antitrust Litigation</i>	3:11-cv-05479	United States District Court for the District of New Jersey
<i>In re: McKinsey & Co., Inc. National Prescription Opiate Consultant Litigation</i>	3:21-md-02996-CRB (SK)	United States District Court for the Northern District of California
<i>Government Employees Health Association v. Actelion Pharmaceuticals Ltd., et al.</i>	GLR-18-3560	United States District Court for the District of Maryland

<i>San Miguel Hospital Corp., d/b/a Alta Vista Regional Hospital v. Johnson & Johnson</i>	1:23-cv-00903	United States District Court for the District of New Mexico
<i>In re Google Assistant Privacy Litigation</i>	19-cv-04286-BLF	United States District Court for the Northern District of California
<i>KPH Healthcare Services, Inc. v. Mylan N.V</i>	2:20-cv-02065- DDC-TJJ	U.S. District Court for the District of Kansas
<i>Nix v. The Chemours Co. FC, LLC</i>	7:17-cv-00189	U.S. District Court for the Eastern District of North Carolina Southern Division
<i>Fund Liquidation Holdings LLC. et al. v. UBS AG et al.</i>	15-cv-5844	U.S. District Court for the Southern District of New York
<i>In re: Evanston Northwestern Healthcare Corp. Antitrust Litigation</i>	1:07-cv-04446	U.S. District Court for the Northern District of Illinois
<i>Sullen, et al. v. Vivint, Inc.</i>	01-CV-2023-903893	Circuit Court of Jefferson County, Alabama, Birmingham Division
<i>Jeffrey Koenig, et al. v. VIZIO, Inc.</i>	BC 702266	Superior Court of California, County of Los Angeles
<i>Bultemeyer v. CenturyLink Inc.</i>	2:14-cv-02530-SPL	United States District Court for the District of Arizona
<i>In re Cattle and Beef Antitrust Litigation, et al. (In re DPP Beef Litigation)</i>	20-cv-01319 JRT-HB	United States District Court for the District of Minnesota
<i>Sheet Metal Workers Local No. 20 Welfare and Benefit Fund, et al. v. CVS Pharmacy, Inc., et al.</i>	16-046 WES and 16-447 WES	United States District Court for the District of Rhode Island
<i>Daniel Berman, et al. v. Freedom Financial Network, LLC, et al.</i>	18-cv-01060-YGR	United States District Court for the Northern District of California
<i>Hoffman v. City of Los Angeles</i>	BC672326	Superior Court of the State of California, County of Los Angeles
<i>In Re: Suboxone (Buprenorphine Hydrochloride and Naloxone) Antitrust Litigation</i>	2:13-md-02445-MSG	United States District Court for the Eastern District of Pennsylvania
<i>Stacy Dorcas v. Aterian, Inc.</i>	CIVSB2222117	Superior Court of the State of California for the County of San Bernardino
<i>In re Term Commodities Cotton Futures Litigation</i>	12-cv-5126	U.S. District Court for the Southern District of New York
<i>Lincoln Adventures, LLC, et al. v. Those Certain Underwriters at Lloyd's, London Members of Syndicates, et al.</i>	2:08-cv-00235-CCC-JAD	U.S. District Court for the District of New Jersey
<i>Sonterra Capital Master Fund Ltd., et al. v. Barclays Bank PLC, et al.</i>	15-cv-3538	U.S. District Court for the Southern District of New York
<i>In re Xyrem (Sodium Oxybate) Antitrust Litigation</i>	20-md-02966-RS	U.S. District Court for the Northern District of California
<i>In re Zetia (Ezetimibe) Antitrust Litigation</i>	2:18-md-2836	U.S. District Court for the Eastern District of Virginia Norfolk Division

<i>In re Bank of Nova Scotia Spoofing Litigation</i>	3:20-cv-11059 (MAS) (LHG)	U.S. District Court for the District of New Jersey
<i>Solomon vs. Sprint Corporation</i>	1:19-cv-05272-MKV	U.S. District Court for the Southern District of New York
<i>In re European Government Bonds Antitrust Litigation</i>	1:19-cv-02601	U.S. District Court for the Southern District of New York
<i>In re Broiler Chicken Antitrust Litigation</i>	1:16-cv-08637	U.S. District Court for the Northern District of Illinois
<i>In re: Broiler Chicken Antitrust Litigation (End- User Consumer Action)</i>	1:16-cv-08637	U.S. District Court for the Northern District of Illinois
<i>In re: Broiler Chicken Antitrust Litigation – Commercial & Institutional Indirect Purchaser Plaintiff Actions</i>	1:16-cv-08637	U.S. District Court for the Northern District of Illinois
<i>Budicak, Inc. et al. v. Lansing Trade Group, LLC et al.</i>	2:19-cv-02449	U.S. District Court for the District of Kansas
<i>In re HIV Antitrust Litigation</i>	3:19-cv-02573-EMC	U.S. District Court for the Northern District of California
<i>In re Namenda Indirect Purchaser Antitrust Litigation</i>	1:15-cv-6549	U.S. District Court for the Southern District of New York
<i>In re Pork Antitrust Litigation</i>	No. 0:18-cv-01776-JRT- HB	U.S. District Court District of Minnesota
<i>In re Pork Antitrust Litigation (Indirect Purchaser Actions)</i>	No. 0:18-cv-01776-JRT- HB	U.S. District Court District of Minnesota
<i>Laydon v. Mizuho Bank, Ltd., et al.</i>	12-cv-3419	U.S. District Court for the Southern District of New York
<i>In re Opana ER Antitrust Litigation</i>	1:14-cv-10150	U.S. District Court for the Northern District of Illinois
<i>Christopher Julian, et al. v. TTE Technology, Inc.</i>	3:20-CV-02857-EMC	U.S. District Court Northern District of California
<i>In re Flint Water Cases</i>	5:16-cv-10444-JEL-EAS	NA
<i>Automobile Antitrust Cases I and II</i>	JCCP Nos. 4298 and 4303, Master File No. 19-md-02878	Superior Court of the State of California for the County of San Francisco
<i>Smith v. FirstEnergy Corp., et al.</i>	2:20-cv-3755	U.S. District Court for the Southern District of Ohio
<i>Fund Liquidation Holdings LLC. V. Citibank, N.A., et al.</i>	1:16-cv-5263 (AKH)	U.S. District Court for the Southern District of New York
<i>In re: Generic Pharmaceuticals Pricing Antitrust Litigation</i>	2:16-MD-02724	U.S. District Court for the Eastern District of Pennsylvania
<i>Sullivan, et al. v. Barclays plc, et al.</i>	13-cv-2811 (PKC)	U.S. District Court for the Southern District of New York
<i>Dennis, et al. v JP Morgan Chase & Co., et al.</i>	16-cv-06496 (LAK)	U.S. District Court for the Southern District of New York
<i>Staley, et al. v. Gilead Sciences, Inc., et al.</i>	3:19-cv-02573-EMC	U.S. District Court for the Northern District of California
<i>In Re Ranbaxy Generic Drug Application Antitrust Litigation</i>	19-md-02878	U.S. District Court for the District of Massachusetts

<i>In re Capacitors Antitrust Lawsuit</i>	3:17-md-02801-JD	U.S. District Court for the Northern District of California
<i>In Re: Johnson & Johnson Sunscreen Marketing, Sales Practices and Products Liability Litigation</i>	3015	U.S. District Court for the Southern District of Florida
<i>In re Citrus Canker Litigation</i>	03-8255 CA 13	Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida
<i>Hill-Green v. Experian Information Solutions, Inc.</i>	3:19-cv-00708	U.S. District Court for the Eastern District of Virginia
<i>Benson Githieya v. Global Tel Link Corp.</i>	1:15-CV-00986-AT	U.S. District Court for the Northern District of Georgia
<i>Bowen v. UPMC Settlement</i>	GD-21-002075	Allegheny Cty. Ct. Com. Pl.
<i>The Roman Catholic Diocese of Rockville Centre, New York</i>	20-12345	U.S. District Court for the Southern District of New York
<i>The Roman Catholic Church for the Archdiocese of New Orleans</i>	20-10846	U.S. Bankruptcy Court, Eastern District of Louisiana
<i>In re Roundup Products Liability Litigation</i>	3:16-md-02741-VC	U.S. District Court for the Northern District of California
<i>In re Boy Scouts of America and Delaware BSA, LLC</i>	20-10343	U.S. Bankruptcy Court for the District of Delaware
<i>Krueger v. Wyeth Inc, et al.</i>	3:03-cv-02496-JAH-MDD	U.S. District Court for the Southern District of California
<i>Hamm v. Sharp Electronics Corporation</i>	5:19-cv-00488	U.S. District Court for the Middle District of Florida
<i>In Re: PG&E Corporation</i>	19-30088	U.S. District Court for the Northern District of California
<i>In re Chinese-Manufactured Drywall Products Liability Litigation</i>	2:09-md-02047	U.S. District Court for the Eastern District of Louisiana
<i>Colorado Attorney General CenturyLink Settlement</i>		
<i>The Hospital Authority of Metropolitan Government of Nashville and Davidson County v. Momenta Pharmaceuticals, Inc.</i>	15-CV-01100	U.S. District Court for the Middle District of Tennessee
<i>Freeman v. Grain Processing Corporation</i>	13-0723	Supreme Court of Iowa
<i>Culler v. Multi-State Lottery Association</i>	LACL136787	Iowa District Court for Polk County
<i>In re LIBOR-Based Financial Instrument Antitrust Litigation</i>	11-MD-2262	U.S. District Court for the Southern District of New York
<i>In re Domestic Airline Travel Antitrust Litigation</i>	2656	U.S. District Court for the District of Columbia
<i>MSPA Claims I, LLC v. IDS Property Casualty Insurance Company</i>	1:16-CV-21040	U.S. District Court for the Southern District of Florida
<i>Speaks v. U.S. Tobacco Cooperative, Inc.</i>	5:12-CV-729-D	U.S. District Court for the Eastern District of North Carolina
<i>Jabbari v. Wells Fargo & Co.</i>	3:15-cv-02159	U.S. District Court for the Southern District of California
<i>United Desert Charities, et al. v. Sloan Valve Company, et al.</i>	12-CV-06878	U.S. District Court for the Central District of California
<i>In re: Volkswagen "Clean Diesel" MDL</i>	15-MD-2672-CRB	U.S. District Court for the Northern District of California

<i>In re: Automotive Parts Antitrust Litigation</i>	12-md-02311	U.S. District Court for the Eastern District of Michigan
<i>In re Municipal Derivatives Antitrust Litigation</i>	MDL No. 1950, No. 08-02516	U.S. District Court for the Southern District of New York
<i>In re: Oil Spill by the Oil Rig "Deepwater Horizon" in Gulf of Mexico</i>	MDL 2179	U.S. District Court for the Eastern District of Louisiana
<i>Muscarella v. Commonwealth of Pennsylvania</i>	10 F.R. 2011	Commonwealth Court of Pennsylvania
<i>Precision Associates Inc. v. Panalpina World Transport, et al.</i>	8-cv-00042	U.S. District Court for the Eastern District of New York
<i>Mirakay, et al. v. Dakota Growers Pasta Co. Inc., et al.</i>	3:13-cv-04429	U.S. District Court for the District of New Jersey
<i>Imran Chaudhri v. Osram Sylvania Inc.</i>	2:11-cv-05504	U.S. District Court for the District of New Jersey
<i>Trammell v. Barbara's Bakery Inc.</i>	12-cv-02664	U.S. District Court for the Northern District of California
<i>Independent Foreclosure Review</i>		Department of Justice
<i>In Re: TFT-LCD (Flat Panel) Antitrust Litigation</i>	MDL No. 1827	U.S. District Court, Northern District of California, San Francisco Division
<i>In re: Sony Gaming Networks and Customer Data Security Breach Litigation</i>	11-MD-2258	U.S. District Court for the Southern District of California
<i>Koyle v. Level 3 Communications, Inc.</i>	01-0286-S-BLW	U.S. District Court for the District of Idaho
<i>In Re: Korean Air Lines Co., Ltd. Antitrust Litigation</i>	07-01891	U.S. District Court for the Central District of California
<i>In re: DRAM Antitrust Litigation</i>	MDL No. 1486	U.S. District Court for the Northern District of California
<i>In re: Transpacific Passenger Air Transportation Antitrust Litigation</i>	07-CV-5634-CRB, MDL 1913	U.S. District Court for the Northern District of California
<i>In re M3Power Razor System Marketing & Sales Practices Litigation</i>	05-cv-11177	U.S. District Court for the District of Massachusetts
<i>In re: NYC Bus Tour Antitrust Litigation</i>	13-cv-0711	U.S. District Court for the Southern District of New York
<i>In re: Electronic Books Antitrust Litigation</i>	1:11-md-02293	U.S. District Court for the Southern District of New York
<i>Scharfstein v. BP West Coast Products LLC</i>	1112-17046	State of Oregon Circuit Court for Multnomah County
<i>Vioxx Products Liability Litigation</i>	MDL No. 1657	U.S. District Court for the Eastern District of Louisiana
<i>Glaberson v. Comcast Corp.</i>	2:03-cv-06604-JP	U.S. District Court for the Eastern District of Pennsylvania
<i>Dolmage v. Province of Ontario</i>	CV-09-376927CP00	Ontario Superior Court of Justice
<i>Blessing v. Sirius XM Radio, Inc.</i>	09-CV-10035 HB	U.S. District Court for the Southern District of New York.
<i>Cipro Cases I and II</i>	No. 4154 and No. 4220	Superior Court of California
<i>In re National Football League Players' Concussion Injury Litigation</i>	MDL No. 2323	U.S. District Court for the Eastern District of Pennsylvania

<i>Hanley v. Fifth Third Bank</i>	1:2012cv01612	U.S. District Court for the Northern District of Illinois
<i>Roos v. Honeywell Int'l, Inc.</i>	04-0436205	Superior Court of California
<i>United Desert Charities, et al. v. Sloan Valve Company, et al.</i>	CV12-06878	U.S. District Court, Central District of California
<i>In re Toyota Motor Corp. Unintended Acceleration Mktg, Sales Practs., & Prods. Litig.</i>	10-ml-2151	U.S. District Court for the Central District of California
<i>Abbott v. Lennox Industries Inc.</i>	16-2011-CA-010656	4th Jud. Cir. Ct., Dade Cty. Fla.
<i>In re: Metoprolol Succinate End-Payor Antitrust Litigation</i>	06-cv-71	U.S. District Court for the District of Delaware
<i>In re Imprelis® Herbicide Marketing, Sales Practices and Products Liability Litigation</i>	MDL 2284	U.S. District Court for the Eastern District of Pennsylvania
<i>Smajlaj, et al. v. Campbell Soup Company, et al.</i>	10-cv-01332-JBS-AMD	U.S. District Court for the District of New Jersey
<i>Kramer v. B2Mobile, LLC</i>	10-cv-02722	U.S. District Court for the Northern District of California
<i>Donovan v. Philip Morris USA, Inc.</i>	06-CA-12234	U.S. District Court for the District of Massachusetts
<i>In re National Arbitration Forum Trade Practices Litigation</i>	MDL No. 10-2122	U.S. District Court for the District of Minnesota
<i>In re: Pharmaceutical Industry Average Wholesale Price Litigation</i>	No. 01-CV-12257-PBS, MDL No. 1456	U.S. District Court for the District of Massachusetts
<i>Nelson v. Mead Johnson & Company, LLC</i>	09-cv-61625-JIC	U.S. District Court for the Southern District of Florida
<i>Lee v. Carter-Reed Company, L.L.C.</i>	UNN-L-3969-04	Superior Court of New Jersey, Union County
<i>FTC Iovate Settlement</i>		Federal Trade Commission
<i>FTC LeanSpa Settlement</i>		Federal Trade Commission
<i>FTC Walgreens Settlement</i>		Federal Trade Commission
<i>Glazer v. Whirlpool Corp.</i>	No. 1:08-WP-65000, MDL 2001	U.S. District Court for the Northern District of Ohio
<i>Behrend v. Comcast Corp.</i>	03-6604	U.S. District Court for the Eastern District of Pennsylvania
<i>Commonwealth of Massachusetts v. Fremont Investment & Loan</i>	07-4373-BLS	Commonwealth of Massachusetts
<i>Dolmage v. Province of Ontario</i>	CV-09-376927	Ontario Superior Court of Justice
<i>In re Lawn Mower Engine Horsepower Marketing and Sales Practices Litigation</i>	MDL No. 1999, 2:08-md-01999	U.S. District Court for the Eastern District of Wisconsin
<i>Craft, et al. v. Philip Morris Companies, Inc., et al.</i>	002-00406-02	Missouri Circuit Court, Twenty-Second Judicial Circuit
<i>In Re: Pre-Filled Propane Tank Marketing and Sales Practices Litigation</i>	MDL No. 2086	U.S. District Court for the Western District of Missouri
<i>In re BP Propane Indirect Purchaser Antitrust Litigation</i>	06-CV-3841	U.S. District Court for the Northern District of Illinois
<i>In re Vytarin/Zetia Marketing, Sales Practices, and Products Liability Litigation</i>	08-285(DMC)	U.S. District Court for the District of New Jersey
<i>In re Bluetooth Headset Product Liability Litigation</i>	07-ML-1822, MDL 1822	U.S. District Court for the Central District of California

<i>The Authors Guild, Inc., et al. v. Google Inc.</i>	05 CV 8136-DC	U.S. District Court for the Southern District of New York
<i>Larry Bowens, et al. v. 7-Eleven, Inc., The Southland Corporation, MDK Corporation, and ENSR Corporation</i>	20D03-0209-CT-48	Elkhart Superior Court No. 3
<i>Sadowski v. General Motors Corp.</i>	HG03093843	Superior Court of the State of California for the County of Alameda
<i>Cox, et al. v. Shell Oil Company</i>	18,844	Chancery Court for Obion County, at Union City, Tennessee
<i>Wilson v. Airborne, Inc., et al.</i>	EDC V07-770 VAP (OPx)	U.S. District Court for the Central District of California
<i>Galanti v. Goodyear Tire & Rubber Company</i>	03-209	U.S. District Court for the District of New Jersey
<i>In re Toys “R” Us Antitrust Litigation</i>	CV-97-5750, MDL No. 1211	U.S. District Court for the Eastern District of New York
<i>In re W.R. Grace & Co.</i>	01-01139	U.S. Bankruptcy Court for the District of Delaware
<i>Cobell v. Salazar</i>	96-01285	U.S. District Court for the District of Columbia
<i>Dryer v. National Football League</i>	9-02182	U.S. District Court for the District of Minnesota
<i>In re Black Farmers Discrimination Litig.</i>	08-511	U.S. District Court for the District of Columbia
<i>Keepseagle v. Vilsack</i>	99-03119	U.S. District Court for the District of Columbia
<i>In re Energy Future Holdings Corp.</i>	14-10979	U.S. Bankruptcy Court for the District of Delaware
<i>In re Garlock Sealing Technologies LLC</i>	10-31607	U.S. Bankruptcy Court for the Western District of North Carolina
<i>In re SCBA Liquidation, Inc., f/k/a Second Chance Body Armor, Inc.</i>	04-12515	U.S. Bankruptcy Court for the Western District of Michigan
<i>In re Enfamil LIPIL Mktg. & Sales Practs. Litig.</i>	MDL No. 2222	U.S. District Court for the Southern District of Florida

ARTICLE

Shannon Wheatman & Elaine Pang, *Reality Check: The State of Media and Its Usage in Class Notice*, in *A Practitioner’s Guide to Class Actions*, 3rd Ed. 849 - 858 (Marcy Greer ed., 2021)

EXHIBIT B

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CAPABILITIES

About A.B. Data

 Founded in 1981, **A.B. Data has earned a reputation** for expertly managing the complexities of class action administration in consumer, antitrust, securities, Securities and Exchange Commission (SEC) enforcement actions, and ERISA, Attorneys General, employment, civil rights, insurance, environmental, wage and hour, and other class action cases. **A.B. Data's work in all aspects of class action administration** has been perfected by decades of experience in hundreds of class action cases involving billions of dollars in total settlements. Dedicated professionals deliver **A.B. Data's all-inclusive services**, working in partnership with its clients to administer their class action cases effectively, efficiently, and affordably, regardless of size or scope.

A.B. Data offers unmatched resources and capacity and is capable of expertly administering any class action notice, settlement, and/or fund administration. Whether notifying millions of class members in the United States or throughout the world, processing millions of claims, distributing payments digitally via A.B. Data's Digital PayPortalSM, or printing and distributing millions of checks, **A.B. Data matches its talent and technology** to the specific needs of its clients, delivering unparalleled service on time and on budget without ever compromising quality.

Location, Ownership Structure

 **A.B. Data is an independently owned**, more than 40-year-old, Milwaukee, Wisconsin-based company that prides itself on its vast expertise and industry-leading innovations. We like to remind our clients and partners that we're not just a class action administration company, but a group of experienced, dedicated professionals who believe that relationships are just as important as the accurate and timely management of class action administrations. In other words, we are people who do business with people.

Services

 **Every A.B. Data client is deserving of the best job we can put forward.** A.B. Data makes class action administration easy for our clients with clarity, convenience, and efficiency. Our priority is to navigate the intricacies of our clients' matters and deliver successful results by using our solid expertise, advanced technology, and top-quality products and services. We pay attention to the details and get it right the first time.

We aim to provide our clients the full experience of a truly collaborative working relationship. It is why we believe much of our success originates from our philosophy of "people doing business with people."

Services

All Digital — From Notice to Distribution

A.B. Data is uniquely positioned to design, implement, and maintain notice and settlement administration programs using an innovative, "all-digital" approach that replaces the more traditional and less efficient methods of administration, such as newspaper ads, mailed notices, and paper checks. Many of our recent proposed notice plans and claim programs utilize the latest technologies such as microtargeted digital ads for notice, streamlined online claims, and distributing settlement funds electronically using a digital paywall. These methods provide significant cost savings, are consistent with the amendments to Rule 23 that are now in effect, and importantly provide much-needed alignment of class action notice and administration with current consumer behaviors.

Pre-Settlement Consultation

The pre-settlement consultation is a collaborative session designed to help A.B. Data clients prepare a stronger case. Our support teams simplify the task of sorting through a maze of documents during investigation and discovery, streamlining the process and preserving fund assets. From there, we assist with fully interactive media packages for court presentations and settlement negotiations. A.B. Data works closely with our clients, offering expert testimony on documents, processing, class and notice manageability, and proposed plans of allocation.

Media Services

A.B. Data continues to earn our reputation as the early innovator in integrating advanced micro-targeting techniques, including contextual targeting, behavioral targeting, and predictive modeling. Coupled with inventive digital media strategies to drive claims, case-specific banner ad development, class member research, and comScore analysis services, our multi-tiered media programs are designed to cost-effectively deliver notice to potential class members and increase claims rates.

Notice Administration

In A.B. Data, clients have a comprehensive resource with a depth of experience in direct notice. Our compliance and understanding of Rule 23 of the Federal Rules of Civil Procedure are crucial in meeting the "plain language" legal requirements for any campaign. From our sophisticated digital media capabilities and extensive global experience with class member research, our experts create notice documents that are easily understandable and cost-efficient to produce. We consult with our clients to deliver notice documents from multi-page, mailed, or emailed notice packets to concise postcards that establish the most influential and cost-effective means of communicating with potential claimants.

Claims Processing

A.B. Data continues to bring game-changing technologies to improve the speed and precision in claims processing. Our robust system for online claims submissions allows us to meticulously verify data and documentation, preserve and authenticate claims, and calculate and verify settlement amounts. In addition, our data network infrastructure includes on-site data storage, backup, contingency plans, and security for electronic and hard copy claim filings. It is all part of a total commitment to be the most innovative and comprehensive resource in the industry. At A.B. Data, we take pride in having the in-house capacity to process millions of pages, as well as the organizational integrity to treat every claim as if it were the only one.

Contact Center

A.B. Data's Contact Center is comprised of a full staff that is trained on and equipped with online and telecommunication systems to monitor and connect with class members. Associates routinely monitor class member communication for all class action administrations, including antitrust, consumer, and securities.

Utilizing monitoring software, associates watch multiple social media channels simultaneously, allowing for instantaneous routing of inquiries and interaction with claimants. Detailed and concise analytical reports outlining Contact Center activities are always provided.

Our Contact Center and case websites are capable of handling millions of class member engagements, as recently displayed in a campaign which garnered over 1.2 million website visits in two months and had more than 72,500 Facebook engagements. Facebook comments and threads are monitored and claimants are guided to the website for more information. Google AdWords and display advertising have also brought hundreds of thousands of visitors to various case websites.

A.B. Data's Contact Center also has Spanish language associates in-house and we can accommodate any language, given proper lead time. Traditional call center facilities are also available, if needed.

Case Websites

We offer a state-of-the-art technology platform that supports every step of our class action administration process. Our expert marketing professionals design customized case-specific websites that provide potential class members easy access to case information, critical documents, important deadlines, as well as the capability to file claim forms and register for future mailings about the case. Claimants can use the website to elect to receive their settlement payments by mail or by one of several digital payment options, all accessible by mobile devices.

Settlement Fund Distribution

From complete escrow services to establishment of qualified settlement funds, check printing and mailing, electronic cash or stock distribution and tax services, A.B. Data has always provided a full-service solution to Settlement Fund Distribution. Our IT team has decades of experience in developing and implementing fast, secure databases and claims administration systems that ensure class members receive the correct amount in their settlement disbursement. Today's digital capabilities allow even greater convenience for class members. In certain instances, claimants can now elect to

instantaneously receive settlement payments through popular digital-payment options, such as PayPal, Amazon, and virtual debit cards.

A.B. Data's Leadership



A.B. Data's administration team is composed of the following key executives, who collectively have decades of experience settling and administering class actions:

Bruce A. Arbit, Co-Managing Director and one of the founders of the A.B. Data Group, serves as Chairman of the Board and oversees the day-to-day operations of the A.B. Data Group of companies, employing almost 400 people in the United States and Israel. Mr. Arbit is also Chairman of the Board of Integrated Mail Industries, Ltd. and has served as a member of the Board of Directors of University National Bank and State Financial Bank. He is the past Chairman of Asset Development Group, Inc., Home Source One, and American Deposit Management and is a member of the National Direct Marketing Association, the Direct Marketing Fundraising Association, and the American Association of Political Consultants. He was named 1996 Direct Marketer of the Year by the Wisconsin Direct Marketing Association.

A.B. Data's work in class action litigation support began with the Court selecting A.B. Data to oversee the restitution effort in the now-famous Swiss Banks Class Action Case, the International Commission on Holocaust Era Insurance Claims, and every other Holocaust Era Asset Restitution program, in which it was the company's job to identify, contact, and inform survivors of the Holocaust. A.B. Data delivered by reaching out to millions of people in 109 countries who spoke more than 30 languages. Since those days, Mr. Arbit has guided the class action division through phenomenal growth and success. Today, A.B. Data manages hundreds of administrations annually that distributes billions of dollars to class members.

Thomas R. Glenn, President, Mr. Glenn's management of A.B. Data's Class Action Administration Company includes designing and implementing notice plans and settlement administration programs for antitrust, securities, and Securities and Exchange Commission settlements and SEC disgorgement fund distributions, as well as consumer, employment, insurance, and civil rights class actions. Mr. Glenn previously served as Executive Vice President at Rust Consulting and has more than 30 years of executive leadership experience.

Eric Miller, Senior Vice President, as a key member of A.B. Data's Class Action Administration Leadership Team, oversees the Case Management Department and supervises the operations and procedures of all of A.B. Data's class action administration cases. Mr. Miller is recognized in the class action administration industry as an expert on securities, SEC, consumer, product recall, product liability, general antitrust, pharmaceutical antitrust, and futures contract settlements, to name a few settlement types. Prior to joining A.B. Data, Mr. Miller served as the Client Service Director for Rust Consulting, responsible there for its securities practice area. He has more than 20 years of operations, project management, quality assurance, and training experience in the class action administration industry. In addition, Mr. Miller manages A.B. Data's office in Palm Beach Gardens, Florida.

Justin Parks, Senior Vice President, is a member of A.B. Data's Class Action Administration Leadership Team. Mr. Parks brings extensive experience in client relations to A.B. Data's business development team. Mr. Parks has over 15 years of experience in the legal settlement administration services industry and has successfully managed and consulted on notice plans and other administrative aspects in hundreds of cases. Mr. Parks is uniquely experienced in Data Privacy matters, having consulted with clients on numerous matters stemming from data breaches as well as violations of the Illinois Biometric Information Privacy Act (BIPA), including some of the first ever Biometric Privacy related settlements in history. Mr. Parks' knowledge and understanding of the class action industry, as well as his client relationship skills, expand A.B. Data's capacity to achieve its business development and marketing goals effectively.

Elaine Pang, Vice President, Media, oversees the Media Department and is responsible for the direction, development, and implementation of media notice plans for A.B. Data's clients. Ms. Pang brings more than 15 years of experience in developing and implementing multifaceted digital and traditional media for high profile complex legal notice programs. She uses her experience in class actions and advertising to provide the best practicable notice plans for large scale campaigns across domestic and international regions, and she leverages her expertise to better understand the evolving media landscape and utilize cutting-edge technology and measurement tools. Prior to entering the class action industry, Ms. Pang worked with many leading reputable brands, including General Mills, Air Wick, Jet-Dry, Comedy Central, Madison Square Garden, Radio City Music Hall, and Geox. She earned her MBA from Strayer University and holds a BS in Marketing from Pennsylvania State University. Ms. Pang's credentials include Hootsuite Social Marketing Certification, Google Adwords and Analytics Certification, and IAB Digital Media Buying and Planning Certification.

Paul Sauberer, Vice President of Quality, is responsible for overseeing quality assurance and process management, working diligently to mitigate risk, ensure exceptional quality control, and develop seamless calculation programming. Mr. Sauberer brings more than 20 years of experience as a quality assurance specialist with a leading claims-processing company where he developed extensive knowledge in securities class action administration. He is recognized as the class action administration industry's leading expert on claims and settlement administrations of futures contracts class actions.

Steve Straub, Vice President, Operations, started with A.B. Data in 2012 as a Claims Administrator. He moved through the ranks within the company where he spent the past five years as Senior Project Manager managing many of the complex commodities cases such as *In re LIBOR-Based Financial Instruments Antitrust Litigation*, *In re London Silver Fixing, Ltd. Antitrust Litigation*, and *Laydon v. Mizuho Bank, Ltd., et al.* Mr. Straub's performance in these roles over the past ten years, along with his comprehensive knowledge of company and industry practices and first-person experience leading the project management team, has proven him an invaluable member of the A.B. Data team.

In his role as Vice President of Operations, his responsibilities include developing efficiencies within the operations center, which includes mailroom, call center, and claims processing areas. His areas of expertise include business process development, strategic/tactical operations planning and implementation, risk analysis, budgeting, business expansion, growth planning and implementation, cost reduction, and profit, change, and project management. Mr. Straub is well-versed in the administration of securities, consumer, and antitrust class action settlements. He earned his Juris Doctor degree from Seton Hall University School of Law in Newark, New Jersey.

Jack Ewashko, Director of Client Services, brings twenty years of industry and brokerage experience to his role with A.B. Data. He is an accomplished client manager adept at facilitating proactive communications between internal and outside parties to ensure accurate and timely deliverables. Mr. Ewashko previously held positions at two claim administration firms where he

oversaw the securities administration teams and actively managed numerous high-profile matters, including the \$2.3 billion foreign exchange litigation. He notably served as Vice President, FX and Futures Operations at Millennium Management, a prominent global alternative investment management firm. As he progressed through trading, analytic, management, and consultancy roles at major banks and brokerage firms, Mr. Ewashko gained hands-on experience with vanilla and exotic securities products, including FX, commodities, mutual funds, derivatives, OTC, futures, options, credit, debt, and equities products. In the financial sector, he also worked closely with compliance and legal teams to ensure accuracy and conformity with all relevant rules and regulations regarding the marketing and sale of products, as well as the execution and processing of trades. He has held Series 4, Series 6, Series 7, and Series 63 licenses, and has been a member of the Futures Industry Association (FIA) and Financial Industry Regulatory Authority (FINRA). Mr. Ewashko earned his Bachelor of Business Administration from Long Island University, Brooklyn, New York.

Brian Devery, Director of Client Services, brings more than a decade of experience in class action administration and project management, as well as over two decades of experience as an attorney (ret.). Mr. Devery currently focuses on consumer, antitrust, employment, and other non-securities based administrations. In addition to driving project administration, he is focused on the implementation of process improvement, streamlining, and automation. Mr. Devery is admitted to practice law in State and Federal Courts of New York with his Juris Doctorate earned from the Maurice A. Deane School of Law at Hofstra University, Hempstead, New York.

Adam Walter, PMP, Director of Client Services, has nearly fifteen years of experience managing the administration of securities class action settlements and SEC disgorgements totaling more than \$4 billion. He has managed settlement programs in engagements involving some of the largest securities class action settlements and is a key contributor to the development of administration strategies that meet the evolving needs of our clients. His responsibilities include developing case administration strategies to ensure that all client and court requirements and objectives are met, overseeing daily operations of case administrations, ensuring execution of client deliverables, providing case-related legal and administration support to class counsel, overseeing notice dissemination programs, implementing complex claims-processing and allocation methodologies, establishing quality assurance and quality control procedures, and managing distribution of settlement funds. Mr. Walter holds a bachelor's degree in business administration from Florida Atlantic University, Boca Raton, Florida. He also has been an active member of the Project Management Institute since 2010 and is PMP®-certified.

Eric Nordskog, Director of Client Services, started with A.B. Data in 2012 on the operations team, managing dozens of team leads and claims administrators in the administration of legal cases and actions. In 2017, Mr. Nordskog was promoted to Project Manager, due in part to his proven ability to add consistency and efficiency to the e-claim filing process with new streamlined processes and audit practices. Today, as Senior Project Manager, he directs many of A.B. Data's securities, insurance, and consumer cases. He regularly oversees the administration of large insurance cases, such as two recent Cigna Insurance matters that involved complex calculations and over one million class members each. He is also the primary hiring and training manager for new project managers and coordinators. Mr. Nordskog earned his Juris Doctor degree from Marquette University Law School, Milwaukee, in 2001.

Eric Schultz, MCSE, Information Technology Manager and Security Team Chairperson, has been with A.B. Data for more than 19 years, and is currently responsible for overseeing all information technology areas for all A.B. Data divisions across the United States and abroad, including network infrastructure and architecture, IT operations, data security, disaster recovery, and all physical, logical, data, and information systems security reviews and audits required by our clients or otherwise. As a Microsoft Certified Systems Engineer (MCSE) with more than 25 years of experience in information

technology systems and solutions, Mr. Schultz has developed specializations in network security, infrastructure, design/architecture, telephony, and high-availability network systems.

Secure Environment



A.B. Data's facilities provide the highest level of security and customization of security procedures, including:

- A Secure Sockets Layer server
- Video monitoring
- Limited physical access to production facilities
- Lockdown mode when checks are printed
- Background checks of key employees completed prior to hire
- Frequency of police patrol – every two hours, with response time of five or fewer minutes
- Disaster recovery plan available upon request

Data Security



A.B. Data is committed to protecting the confidentiality, integrity, and availability of personal identifying information and other information it collects from our clients, investors, and class members and requires that its employees, subcontractors, consultants, service providers, and other persons and entities it retains to assist in distributions do the same. A.B. Data has developed an Information Security Policy, a suite of policies and procedures intended to cover all information security issues and bases for A.B. Data, and all of its divisions, departments, employees, vendors, and clients. A.B. Data has also recently taken the necessary, affirmative steps toward compliance with the EU's General Data Protection Regulation and the California Consumer Privacy Act.

A.B. Data has a number of high-profile clients, including the Securities and Exchange Commission (SEC), the United States Department of Justice, the Attorneys General of nearly all 50 states, other agencies of the United States government, and the Government of Israel, as well as direct banking and payment services companies with some of the most recognized brands in United States financial services and some of the largest credit card issuers in the world.

We are therefore frequently subjected to physical, logical, data, and information systems security reviews and audits. We have been compliant with our clients' security standards and have also been determined to be compliant with ISO/IEC 27001/2 and Payment Card Industry (PCI) data-security standards, the Gramm-Leach-Bliley Act (GLB) of 1999, the National Association of Insurance Commissioners (NAIC) Regulations, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and the Health Information Technology for Economic and Clinical Health Act (HITECH).

The Government of Israel has determined that A.B. Data is compliant with its rigorous security standards in connection with its work on Project HEART (Holocaust Era Asset Restitution Taskforce).

A.B. Data's fund distribution team has been audited by EisnerAmper LLP and was found compliant with class action industry standards and within 99% accuracy. EisnerAmper LLP is a full-service advisory and accounting firm and is ranked the 15th-largest accounting firm in the United States.

In addition, as part of PCI compliance requirements, A.B. Data has multiple network scans and audits from third-party companies, such as SecurityMetrics and 403 Labs, and is determined to be compliant with each of them.

Fraud Prevention and Detection



A.B. Data is at the forefront of class action fraud prevention.

A.B. Data maintains and utilizes comprehensive proprietary databases and procedures to detect fraud and prevent payment of allegedly fraudulent claims.

We review and analyze various filing patterns across all existing cases and claims. Potential fraudulent filers are reported to our clients as well as to the appropriate governmental agencies where applicable.

Representative Class Action Engagements



A.B. Data and/or its team members have successfully administered hundreds of class actions, including many major cases. Listed below are just some of the most representative or recent engagements.

Consumer & Antitrust Cases

- *In re EpiPen Marketing, Sales Practices and Antitrust Litigation*
- *In re Broiler Chicken Antitrust Litigation - Commercial (Indirect)*
- *In re Broiler Chicken Antitrust Litigation - Indirect*
- *In re Broiler Chicken Antitrust Litigation - Direct*
- *In re Pork Antitrust Litigation - Directs*
- *In re Pork Antitrust Litigation - Indirects*
- *Peter Staley, et al. v. Gilead Sciences, Inc., et al.*
- *In re: Opana ER Antitrust Litigation*
- *In re Ranbaxy Generic Drug Application Antitrust Litigation*
- *In re Valeant Pharmaceuticals Int'l, Inc. Third-Party Payor Litigation*
- *Staley, et al., v. Gilead Sciences*
- *In Re: Generic Pharmaceuticals Pricing Antitrust Litigation - Direct Purchasers*
- *Beef Direct Purchaser Antitrust Litigation*
- *BCBSM, Inc. v. Vyera Pharmaceuticals, et al. (Daraprim)*
- *In re Automobile Antitrust Cases I and II*
- *Olean Wholesale Grocery Cooperative, Inc., et al. v. Agri Stats, Inc., et al. (Turkey)*

- *Integrated Orthopedics, Inc., et al. v. UnitedHealth Group, et al.*
- *In Re: Restasis (Cyclosporine Ophthalmic Emulsion) Antitrust Litigation*
- *Vista Healthplan, Inc., et al. v. Cephalon, Inc., et al. (Provigil)*
- *Jeffrey Koenig, et al. v. Vizio, Inc.*
- *Wit, et al. v. United Behavioral Health*
- *Weiss, et al. v. SunPower Corporation*
- *Smith, et al. v. FirstEnergy Corp., et al.*
- *Resendez, et al. v. Precision Castparts Corp. and PCC Structural, Inc.*
- *Julian, et al. v. TTE Technology, Inc., dba TCL North America*
- *Eugenio and Rosa Contreras v. Nationstar Mortgage LLC*
- *Phil Shin, et al. v. Plantronics, Inc.*
- *In re: Qualcomm Antitrust Litigation*
- *In re Resistors Antitrust Litigation*
- *The Hospital Authority of Metropolitan Government of Nashville and Davidson County, Tennessee v. Momenta Pharmaceuticals, Inc. and Sandoz Inc. ("Lovenox Antitrust Matter")*
- *William Kivett, et al. v. Flagstar Bank, FSB, and DOES 1-100, inclusive*
- *Adelphia, Inc. v. Heritage-Crystal Clean, Inc.*
- *LLE One, LLC, et al. v. Facebook, Inc.*
- *Bach Enterprises, Inc., et al. v. Advanced Disposal Services South, Inc., et al.*
- *JWG Inc., et al. v. Advanced Disposal Services Jacksonville, L.L.C., et al.*
- *State of Washington v. Motel 6 Operating L.P. and G6 Hospitality LLC*
- *In re GSE Bonds Antitrust Litigation*
- *Wave Lengths Hair Salons of Florida, Inc., et al. v. CBL & Associates Properties, Inc., et al.*
- *In re Loestrin 24 FE Antitrust Litigation*
- *Office of the Attorney General, Department of Legal Affairs, State of Florida v. Pultegroup, Inc. and Pulte Home Company, LLC*
- *In re Cigna-American Specialties Health Administration Fee Litigation*
- *In re: Intuniv Antitrust Litigation*
- *High Street, et al. v. Cigna Corporation, et al.*
- *Gordon Fair, et al. v. The Archdiocese of San Francisco, San Mateo, and Marin County*
- *Bizzarro, et al. v. Ocean County Department of Corrections, et al.*
- *Meeker, et al. v. Bullseye Glass Co.*
- *MSPA Claims 1, LLC v. Ocean Harbor Casualty Insurance Company*
- *Tennille v. Western Union Company - Arizona*
- *Garner, et al. v. Atherotech Holdings, Inc. and Garner, et al. v. Behrman Brothers IV, LLC, et al.*
- *Robinson, et al. v. Escallate, LLC*
- *Josefina Valle and Wilfredo Valle, et al. v. Popular Community Bank f/k/a Banco Popular North America*
- *Vision Construction Ent., Inc. v. Waste Pro USA, Inc. and Waste Pro USA, Inc. and Waste Pro of Florida, Inc.*
- *Plumley v. Erickson Retirement Communities, et al.*
- *In re London Silver Fixing, Ltd. Antitrust Litigation*
- *Ploss v. Kraft Foods Group, Inc. and Mondelēz Global LLC*
- *In re Mexican Government Bonds Antitrust Litigation*
- *In re Ready-Mixed Concrete Antitrust Litigation*
- *In re: Marine Hose Antitrust Litigation*
- *Iowa Ready Mixed Concrete Antitrust Litigation*
- *In re Potash Antitrust Litigation (II)*
- *In re Evanston Northwestern Healthcare Corp. Antitrust Litigation*
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- *In re Relafen Antitrust Litigation*
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- *Nichols, et al., v. SmithKline Beecham Corporation*
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- *Plymouth County Retirement Association v. Spectrum Brands Holdings, Inc., et al.*
- *Tung, et al. v. Dycom Industries, Inc., et al.*
- *Boutchard, et al. v. Gandhi, et al. ("Tower/e-Minis")*
- *MAZ Partners LP v. First Choice Healthcare Solutions, Inc.*
- *SEB Investment Management AB, et al. v. Symantec Corporation, et al.*
- *In re Impinj, Inc. Securities Litigation*
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- *Yellowdog Partners, LP, et al. v. Curo Group Holdings Corp., et al.*
- *In re Brightview Holdings, Inc. Securities Litigation*
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- *Iskander Rasulev v. Good Care Agency, Inc.*
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- *Diana Mey vs. Frontier Communications Corporation*
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For More Information

For more detailed information regarding A.B. Data's experience, services, or personnel, please see our website at www.abdataclassaction.com.

EXHIBIT C

If, during the period April 1, 2019 to December 31, 2023, you purchased a Digital Game through the PlayStation Store that was previously available through a Game Specific Voucher, you may be eligible to receive a payment from a class action lawsuit settlement.

This notice was authorized by a Judge of the United States District Court for the Northern District of California, San Francisco Division. It is not a lawyer solicitation. Please read this notice carefully and in its entirety.

Your rights may be affected by a proposed settlement in a class action lawsuit regarding the prices paid for digital games sold through the Sony PlayStation Store. The lawsuit was filed against Defendant Sony Interactive Entertainment LLC (“Defendant”). The captioned case is *Cendejas, v. Sony Interactive Entertainment LLC*, Civil Action No. 21-cv-03361-AMO (N.D. Cal.) (the “Action”). The Action, which is pending in the United States District Court for the Northern District of California, San Francisco Division (the “Court”), alleges that Defendant violated federal antitrust law and certain state laws. Plaintiff alleges that Defendant unlawfully eliminated competition and monopolized the market for Sony digital games, causing consumers to pay more for certain digital games than they otherwise would have paid on the PlayStation Store. Defendant denies that it engaged in any wrongdoing or that any Plaintiff or putative class member was damaged by Defendant’s conduct. The Court has not decided that Defendant did anything wrong.

The Court has preliminarily approved the proposed settlement between the Plaintiff and Defendant (the “Settlement”). The proposed Settlement will provide for the payment of \$7,850,000 (the “Settlement Amount”) to resolve Plaintiff’s and Settlement Class members’ claims against Defendant. The full text of the Settlement Agreement, which is dated as of November 17, 2024, the proposed Revised Settlement Agreement, which is dated as of December 4, 2024, and the Second Revised Settlement Agreement dated February 26, 2026 are available at www.PSNDigitalGamesSettlement.com.

The Court has scheduled a hearing to decide whether to approve: (i) the Settlement; (ii) the plan for allocating the Settlement Amount to Settlement Class members; (iii) the request of Interim Lead Counsel for payment of attorneys’ fees, costs, and expenses out of the Settlement Amount (iv) the request of Interim Lead Counsel for service awards to Messrs. Agustin Caccuri, Adrian Cendejas, and Allen Neumark out of the Settlement Fund or a reduction of attorneys’ fees to create a separate fund for service awards to Messrs. Caccuri and Neumark. (the “Fairness Hearing”). If the Settlement is approved, it will resolve all claims in the Action. The Fairness Hearing is scheduled for _____, 2026, at __: __ a.m./p.m., before Judge Araceli Martínez-Olguín of the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, California 94102.

Who Is Included in the Settlement Class?

You may be a member of the settlement class in this Action (the “Settlement Class”), and thus entitled to compensation pursuant to the Settlement, if you purchased, through the PlayStation Store one or more Sony video games for which a game-specific voucher (“GSV”) was available

at retail prior to April 1, 2019, for which a total of at least 200 GSV redemptions were made prior to April 1, 2019, and for which the post-discount price increased by at least fifty cents from: (a) the period between January 1, 2017, and March 31, 2019; as compared to (b) the period between April 1, 2019, and December 31, 2023. A GSV is a physical voucher or an electronic code purchased from a non-SIE retailer that enables a PlayStation user to download a specific game from the PlayStation Network.

A more detailed notice, including the list of games that satisfy the characteristics listed above, is available at www.PSNDigitalGamesSettlement.com.

Your Rights and Options

DO NOTHING: If you do not request exclusion from the Settlement Class by **TBD [85 days after Preliminary Approval Order]**, you are a member of the Settlement Class and if you do nothing you will remain in the Settlement Class. You will be bound by any releases, judgments, and decisions of the Court in this Action, including rulings on the Settlement.

EXCLUDE YOURSELF FROM THE SETTLEMENT: If you wish to exclude yourself from the Settlement Class, you must submit a written request by **TBD [85 days after Preliminary Approval Order]**. If you exclude yourself, you will not be bound by any releases or future decisions, judgments, or orders of the Court. You will also not be able to participate in any distribution of the Settlement Amount in this lawsuit. You will retain the right to sue Defendant based on the claims and factual allegations that were or could have been raised in this Action.

OBJECT TO THE SETTLEMENT: If you object to all or any part of the Settlement, the Plaintiff's request for attorneys' fees, or reimbursement of costs, expenses, or service awards to Messrs. Agustin Caccuri, Adrian Cendejas, and Allen Neumark, you must serve a written objection by **TBD [85 days after the Preliminary Approval Order]** and if you desire to speak in person at the Fairness Hearing, you must file a written letter of objection and/or a notice of intention to speak along with a summary statement with the Court and Interim Lead Counsel/Lead Counsel by **[TBD] [176 days after the Preliminary Approval Order]**.

Want More Information?

Go to www.PSNDigitalGamesSettlement.com., call (877)-777-9145, email info@PSNDigitalGamesSettlement.com or write to PSN Digital Game Settlement, P.O. Box 173046, Milwaukee, WI 53217

The deadlines contained in this notice may be amended by Court Order, so you should check www.PSNDigitalGamesSettlement.com for any updates. Please *do not* call the Court, the Clerk of the Court, or the Defendant for information about the Settlement.

EXHIBIT D

NOTICE OF CLASS ACTION SETTLEMENT

PLEASE READ THIS ENTIRE NOTICE CAREFULLY. A UNITED STATES FEDERAL COURT AUTHORIZED THIS NOTICE. IT IS NOT A LAWYER SOLICITATION, AND YOU ARE NOT BEING SUED. YOUR RIGHTS MAY BE AFFECTED BY THE PROCEEDINGS IN THIS ACTION. THIS NOTICE ADVISES YOU OF YOUR RIGHTS AND OPTIONS WITH RESPECT TO THIS ACTION.

If, during the period April 1, 2019 to December 31, 2023, you purchased through the PlayStation Store one or more video games for which a game-specific voucher (“GSV”) was available at retail prior to April 1, 2019, for which a total of at least 200 GSV redemptions were made prior to April 1, 2019, and for which the post-discount price increased by at least fifty cents from: (a) the period between January 1, 2017 and March 31, 2019; as compared to (b) the period between April 1, 2019 and December 31, 2023, a class action lawsuit and settlement may affect your rights.

A class action lawsuit is pending in the United States District Court for the Northern District of California, San Francisco Division (the “Court”). The lawsuit was filed against Defendant Sony Interactive Entertainment LLC (“Defendant” or “SIE”). The captioned case is *Cendejas, v. Sony Interactive Entertainment LLC*, Civil Action No. 21-cv-03361-AMO (N.D. Cal.) (the “Action”). Plaintiff in the lawsuit, Adrian Cendejas, claims that Defendant violated federal antitrust and certain state laws. Plaintiff alleges that Defendant engaged in anticompetitive conduct designed to monopolize the PlayStation digital game market, thereby causing consumers to pay more than they otherwise would have paid for certain digital games on the PlayStation Store. Defendant denies any wrongdoing, and the Court has not decided that Defendant did anything wrong. This lawsuit does not claim that any PlayStation games are defective.

Plaintiff and Defendant have settled this Action for \$7,850,000 (the “Settlement Amount”). This notice (“Notice”) is to inform you that the Court has granted preliminary approval of settlement (the “Settlement”). This Notice provides potential class members (the “Settlement Class”) with notice of their rights and options regarding the Settlement, how to object to the Settlement, and how to exclude themselves from the Settlement.

There will be no claim form to complete because SIE will directly distribute the Settlement Amount, minus court approved attorneys’ fees, costs, expenses and/or service awards, to the PlayStation Network (“PSN”) account wallets of members of the Settlement Class who have not timely and validly excluded themselves from the Settlement. Eligible Class members with deactivated PSN accounts will be able to contact the case 877 number, email the case specific email address and/or mail the case specific postal address and provide qualifying purchase information as well as a current address in order to receive monies they may be entitled to under the settlement. Such Class members must provide this information on or before **TBD [141 days after entry of Preliminary Approval Order]**. The Settlement Amount will be distributed according to the Plan of Allocation.

You can find more information about the Settlement Agreement below and on www.PSNDigitalGamesSettlement.com.

**THE SETTLEMENT CLASS'S AND YOUR LEGAL RIGHTS AND OPTIONS IN THIS
LAWSUIT**

This Notice provides notice that the Court has granted preliminary approval of the Settlement on behalf of the proposed Settlement Class. The Settlement Class is defined below:

All persons in the United States who purchased through the PlayStation Store one or more video games for which a GSV was available at retail prior to April 1, 2019, for which a total of at least 200 GSV redemptions were made prior to April 1, 2019, and for which the post-discount price increased by at least fifty cents from: (a) the period between January 1, 2017 and March 31, 2019; as compared to (b) the period between April 1, 2019, and December 31, 2023. The class period shall be April 1, 2019, to December 31, 2023 (“Class Period”).

The proposed Settlement will provide for the payment of \$7,850,000 to resolve the Action, and related claims, against Defendant. The full text of the proposed Settlement Agreement dated as of November 14, 2024, the Revised Settlement Agreement dated as of December 4, 2024, and the Second Revised Settlement Agreement dated as of February 26, 2026. (“Settlement Agreement”) are available at www.PSNDigitalGamesSettlement.com.

The Court has scheduled a hearing (the “Fairness Hearing”) to decide whether to approve the Settlement Agreement, the plan for allocating the settlement funds to members of the Settlement Class, and the request for attorneys’ fees and reimbursement costs, expenses as well as potential service awards for Agustin Caccuri, Adrian Cendejas, and Allen Neumark from the Settlement Amount or a reduction in the amount of attorneys’ fees to create a separate fund for service awards. If the Revised Settlement Agreement is approved, it will resolve all claims in the Action. The Fairness Hearing is scheduled for [TBD] **[at the Court’s convenience at least 177 days after entry of Preliminary Approval Order]** before Judge Araceli Martínez-Olguín of the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, California 94012.

This Notice incorporates by reference the definitions in the Second Revised Settlement Agreement. The Second Revised Settlement Agreement and the Court’s order granting preliminary approval of the Settlement are available on website www.PSNDigitalGamesSettlement.com. All capitalized terms used, but not defined, shall have the same meanings as in the Second Revised Settlement Agreement and the Court’s order granting preliminary approval of the Settlement (the “Preliminary Approval Order”).

YOUR LEGAL RIGHTS AND OPTIONS REGARDING THIS CLASS ACTION	
EXCLUDE YOURSELF FROM THE PROPOSED SETTLEMENT	If you wish to exclude yourself from the Settlement Class, you must submit a written request by [TBD] [85 days after entry of the Preliminary Approval Order] as described in Question 8, below. If you exclude yourself, you will not be bound by any releases, decisions, judgments, and orders of the Court. You will also not be able to participate in any distribution of the Settlement Amount in this lawsuit. You
OBJECT TO THE PROPOSED SETTLEMENT	If you wish to object to all or any part of the Settlement, Interim Lead Counsel's request for attorneys' fees, reimbursement of costs, expenses or service awards, you must submit a timely written objection according to the instructions in Question 11, below, by [TBD] [85 days after entry of the Preliminary Approval Order].
DO NOTHING	You are automatically part of the Settlement Class if you fit the Settlement Class definition. By not excluding yourself, you will remain a member of the Settlement Class. You will receive the benefit of any future determinations in this case against the Defendant, and you will be bound by any releases or determinations concerning the Defendant on the issues. In other words, you will be bound by any rulings by the Court. This is your only opportunity to exclude yourself from the Settlement Class. If you would like more information about the Action, you can review this Notice and send questions to the Notice and Settlement Administrator and/or Interim Lead Counsel. <i>See</i> Question 11. DO NOT CONTACT THE COURT, THE CLERK OF THE COURT, OR THE DEFENDANT IF YOU HAVE QUESTIONS REGARDING THIS NOTICE.

THESE RIGHTS AND OPTIONS AND THE DEADLINES TO EXERCISE THEM ARE EXPLAINED IN THIS NOTICE.

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INFORMATION ABOUT THE LAWSUIT AND THE CERTIFIED CLASSES
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1. Why did I get this Notice?

This Notice is given pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Northern District of California. It is not junk mail, an advertisement, or a solicitation from a lawyer. You have not been sued. The purpose of the Notice is to inform you of the proposed Settlement in this Action.

You are receiving this Notice because you may be a member of the Settlement Class. You may have purchased through the PlayStation Store one or more digital video games for which a GSV was available at retail prior to April 1, 2019, for which a total of at least 200 GSV redemptions were made prior to April 1, 2019, and for which the post-discount price increased by at least fifty cents from: (a) the period between January 1, 2017, and March 31, 2019; as compared to (b) the period between April 1, 2019, and December 31, 2023. A GSV is a physical voucher or an electronic code purchased from a non-SIE retailer that enables a PlayStation user to download a specific game from the PSN.

2. What is the lawsuit about?

Plaintiff alleges that Defendant violated federal antitrust law and certain state laws. Plaintiff alleges that Defendant engaged in anticompetitive conduct designed to monopolize the PlayStation digital game market,

thereby causing consumers to pay more than they otherwise would have paid for certain digital games on the PlayStation Store.

A copy of the Plaintiff's Second Consolidated Amended Class Action Complaint is available at www.PSNDigitalGamesSettlement.com.

Defendant denies that its alleged conduct violated any applicable laws or regulations and that Settlement Class members are entitled to any relief. Defendant's answer to the Consolidated Amended Class Action Complaint is available at www.PSNDigitalGamesSettlement.com.

THE COURT HAS NOT DECIDED WHETHER DEFENDANT VIOLATED ANY LAWS. THIS NOTICE IS NOT AN EXPRESSION OF ANY OPINION BY THE COURT AS TO THE MERITS OF PLAINTIFF'S CLAIMS AGAINST DEFENDANT OR THE DEFENSES ASSERTED BY DEFENDANT.

The class action is known as *Cendejas, v. Sony Interactive Entertainment LLC*, Civil Action No. 21-md-03361-AMO (N.D. Cal.). Judge Araceli Martínez-Olguín of the United States District Court for the Northern District of California is overseeing this class action.

3. Why is this lawsuit a class action?

In a class action, one or more individuals called "Class Representatives" sue on behalf of others with similar claims. In this case, the Proposed Class Representative is Adrian Cendejas. The Class Representative and the persons on whose behalf he has sued together constitute the "Class."

The company that has been sued is called the "Defendant." In this case, the Defendant is Sony Interactive Entertainment LLC or "SIE." In a class action lawsuit, one court resolves the issues for everyone in the class, except for those class members who exclude themselves (*i.e.*, "opt out") from the class.

The case *does not* claim that PlayStation digital games are defective.

4. Why is there a Settlement with Defendant?

The proposed Settlement occurred after lengthy, hard-fought litigation. At the time of the Settlement, the Defendant's motion to dismiss had been denied, and extensive document discovery was predominately complete, including third-party data from U.S. digital game retailers. The Settlement, if approved by the Court, ensures that Settlement Class members will receive compensation for Defendant's alleged conduct. Interim Lead Counsel and the Class Representative believe that the terms of the Settlement, including the payment by Defendant of \$7,850,000 in exchange for a release of Plaintiff's and the Settlement Class members' claims against Defendant are fair, reasonable, and adequate, and in the best interest of the Class.

5. What does the Settlement with the Defendant provide?

Defendant SIE will pay \$7,850,000 after April 1, 2025, to settle the claims in the Action.

If the Settlement is approved by the Court and becomes final, Interim Lead Counsel will seek approval from the Court to obtain: (i) reasonable attorneys' fees for all class counsel of up to twenty-five percent of the Settlement Amount; (ii) reimbursement of reasonable costs and expenses incurred by class counsel in connection with the Action; and (iii) payment from the settlement fund or a reduction of attorneys' fees to create a separate fund for service awards in the aggregate of \$30,000 for service awards to Agustin Caccuri, Adrian Cendejas, and Allen Neumark in recognition of their efforts to date on behalf of the Settlement Class. The remainder of the Settlement Amount, after payment of the above expenses and payment of any administration expenses, will be divided among and distributed by SIE to Settlement Class members' PSN account wallets, pursuant to the Plan of Allocation. Eligible Class members with

deactivated PSN accounts will be able to contact the case 877 number, email the case specific email address, or mail the case specific postal address and provide qualifying purchase information as well as a current address in order to receive monies they may be entitled to under the settlement. The deadline to submit a request for a check is [TBD] **[141 days after entry of the Preliminary Approval Order]**.

Upon SIE's payment of the Settlement Amount, Plaintiff's and the Settlement Class members' claims against Defendant will be dismissed with prejudice, and Defendant will be released by Plaintiff and Settlement Class members from all claims based upon the factual allegations that were included in the Second Consolidated Amended Class Action Complaint or could have been raised in this Action. The full text of the release is included in the Settlement Agreement available at www.PSNDigitalGamesSettlement.com.

DETERMINING IF YOU ARE A MEMBER OF THE SETTLEMENT CLASS

6. I am a Settlement Class member who has purchased a qualifying PlayStation digital game during the Class Period.

You are a Settlement Class member if between April 1, 2019, and December 31, 2023, you purchased through the PlayStation Store one or more video games for which a GSV was available at retail prior to April 1, 2019, for which a total of at least 200 GSV redemptions were made prior to April 1 2019, and for which the post-discount price increased by at least fifty cents from: (a) the period between January 1, 2017, and March 31, 2019; as compared to (b) the period between April 1, 2019, and December 31, 2023. A list of the eligible games can be found at www.PSNDigitalGamesSettlement.com.

YOUR OPTIONS AS A MEMBER OF THE SETTLEMENT CLASS

7. What are my options as a member of the Settlement Class?

If you are a member of the Settlement Class, you can choose to do nothing, exclude yourself from the Settlement Class, or object to the Settlement.

8. How do I exclude myself from the Settlement Class?

If you wish to be excluded from the Settlement Class, you must file a written request for exclusion with the Court and timely submit by postmarked U.S. mail to Plaintiff's Counsel by [TBD] **[85 days after entry of the Preliminary Approval Order]**. Your request for exclusion must include: (1) that you seek to exclude yourself from the Settlement Class; (2) your name, address, PSN account name, and the email address associated with your PSN account; (3) the name of this case (*Cendejas, v. Sony Interactive Entertainment LLC*, Civil Action No. 21-cv-03361-AMO (N.D. Cal.)); (4) a statement, signed by you or an authorized representative, that you are a member of the Settlement Class and wish to be excluded from the Settlement Class; and (5) documentation sufficient to establish your purchase of a qualifying digital game from the PlayStation Store during the Class Period.

Exclusion requests must be filed with the Court and timely postmarked and mailed to Plaintiff's Counsel as reflected below:

THE COURT	Office of the Clerk of Court U.S. District Court for the Northern District of California 450 Golden Gate Avenue San Francisco, CA 94012
COUNSEL FOR THE CLASS	Michael M. Buchman Joseph Saveri Law Firm LLP 780 Third Avenue, Suite 1200 New York, New York 10017

A separate exclusion request must be submitted by each Settlement Class member who wishes to be excluded from the Settlement Class. Any person included in the Settlement Class who does not timely submit a valid request for exclusion with all necessary information or documentation will be bound by the releases, decisions, judgments, and orders of the Court as well as the outcome of the case for the Settlement Class.

9. What is the legal significance of excluding myself?

If you exclude yourself from the Settlement Class, you will not be legally bound by the Settlement or the related releases, decisions, judgments, and orders of the Court. You may be able to sue the Defendant for the claims and factual allegations that were or could have been raised in this Action in the future within the relevant statute of limitations period(s).

10. If I don't exclude myself, can I sue later?

No. Unless you timely exclude yourself from the Settlement Class, you give up the right to separately sue the Defendant for the conduct alleged in this Action. You must timely exclude yourself from the Settlement to be able to bring your own, separate lawsuit(s) against the Defendant concerning or related to the conduct alleged in the Second Consolidated Amended Class Action Complaint, available at www.PSNDigitalGamesSettlement.com.

Remember, the exclusion deadline is [TBD] [85 days after entry of the Preliminary Approval Order]

11. Can I object to the Settlement?

To object to the Settlement, you (or your lawyer if you have one) must timely file a written objection with the Court and timely postmark and send the objection to Counsel for the Class by U.S. mail [TBD] [85 days after entry of the Preliminary Approval Order]. Your written objection can include any supporting materials, papers, or briefs that you want the Court to consider. Your written objection must include:

- Your name, address, telephone number, PSN account name, and email address associated with your PSN account name;
- An explanation of your objection to the Settlement, including whether it applies only to you, to a subset of the Settlement class, or to the entire Settlement Class;
- The case name and number: *Cendejas., v. Sony Interactive Entertainment LLC*, Civil Action No. 21-cv-03361-AMO (N.D. Cal.);

- Documentation sufficient to establish your purchase of a digital qualifying game from the PlayStation Store during the Class Period;
- Identification of any other class action settlements in which you or your attorney has objected; and
- Your signature.

You must timely file your objection with the Court and postmark and mail to your objection to Counsel for the Class via U.S. mail no later than [TBD] **[85 days after entry of the Preliminary Approval Order]**. The mailing addresses are immediately below.

THE COURT	Office of the Clerk of Court U.S. District Court for the Northern District of California 450 Golden Gate Avenue San Francisco, CA 94012
COUNSEL FOR THE CLASS	Michael M. Buchman Joseph Saveri Law Firm LLP 780 Third Avenue, Suite 1200 New York, New York 10017

IF YOU DO NOTHING

12. What happens if I do nothing at all?

If you do nothing, and you are a member of the Settlement Class, you will receive the benefits of any future determinations in the case against the Defendant and you will be bound by all respective releases and decisions, judgments, and orders of the Court in this Action concerning the Defendant on the issues.

This is your only opportunity to exclude yourself from the Settlement.

THE LAWYERS REPRESENTING YOU

13. As a member of the Class, do I have a lawyer representing my interests in this Class Action?

Yes. The Court has appointed lawyers to represent you and other members of the Class. The lawyer is called Interim Lead Counsel.

COUNSEL FOR THE SETTLEMENT CLASS
Michael M. Buchman Joseph Saveri Law Firm LLP 780 Third Avenue, Suite 1200 New York, NY 10017

14. How will the lawyers be compensated? Will the Class Representatives receive a service award?

If the Court approves the Settlement, Interim Lead Counsel may ask the Court for an award of attorneys' fees of up to twenty-five percent of the Settlement Amount, and reimbursement of costs and expenses

incurred prior to final approval of the Settlement Agreement. Interim Lead Counsel may also ask for service awards for Agustin Caccuri, Adrian Cendejas, and Allen Neumark in the aggregate sum of \$30,000 to be paid from the Settlement Amount or from a reduction in the amount of attorneys' fees to create a separate fund for service awards to Messrs. Caccuri, Cendejas or Neumark for their efforts to date on behalf of the Settlement Class. If the Court grants Interim Lead Counsel's requests, the attorneys' fees, costs and expense amounts would be deducted from the Settlement Amount while the service awards may or may not be deducted from the Settlement Amount. You will not have to pay these fees, costs, or expenses out of your own pocket. Any administrative expenses for the Settlement will also be paid out of the monies from the Settlement Amount.

15. Should I get my own lawyer?

You do not need to hire your own lawyer, but if you hire a lawyer to speak for you or appear in Court, your lawyer must file a Notice of Appearance in this Action. If you hire your own lawyer, it will be your sole responsibility to pay for that lawyer.

THE FAIRNESS HEARING

16. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing on [TBD] [at the Court's convenience at least 177 days after entry of the Preliminary Approval Order]. Information concerning the Fairness Hearing will be posted at www.PSNDigitalGamesSettlement.com when it becomes available. The Court may reschedule the Fairness Hearing without further written notice, so you should check www.PSNDigitalGamesSettlement.com, call (877) 777-9145, or write to PSN Digital Game Settlement, P.O. Box 173046, Milwaukee, WI 53217 if you want to find out if the Fairness Hearing has been rescheduled.

The purpose of the Fairness Hearing is to:

- Decide if the Settlement is fair, reasonable, adequate, and in the best interests of the Settlement Class, and whether it should be approved, and if a final judgment should be entered;
- Consider any request by Interim Lead Counsel for an award of attorneys' fees, reimbursement of costs, expenses and/or service awards;
- Consider all comments and objections; and
- Consider any other issues that the Court thinks are necessary.

17. Must I attend the Fairness Hearing?

No. Attendance is not required. Interim Lead Counsel is prepared to answer questions on your behalf. Settlement Class members who filed and served written objections may (but do not have to) attend the Fairness Hearing themselves or through an attorney hired at their own expense.

18. Can I attend the Fairness Hearing?

Yes, anyone can attend the Fairness Hearing and observe. If you want to attend the Fairness Hearing and object to the Settlement, either by yourself or through an attorney hired at your own expense, you need to

timely file an objection no later than [TBD] **[85 days after entry of the Preliminary Approval Order]** and timely file a Notice of Intent to Appear with the Court no later than [TBD] **[176 days after entry of the Preliminary Approval Order]**, as well as timely mail or email the Notice of Intent to Appear to the mailing addresses of the Plaintiff's Counsel listed in Question 11 no later than [TBD] **[176 days after entry of the Preliminary Approval Order]**. The Notice of Intent to Appear must contain the following information:

- The name, address, and telephone number of the Settlement Class member and, if applicable, the name, address, and telephone number of the Settlement Class member's attorney (who must file a Notice of Appearance);
- The objection, consistent with the requirements identified in Question 11 above, including any supporting papers; and
- The name and address of any witnesses to be presented at the Fairness Hearing, together with a statement as to the matters on which they wish to testify and a summary of the proposed testimony.

GETTING MORE INFORMATION

19. Where do I get more information regarding the Settlement Agreement?

This Notice contains a brief summary of the relevant court papers. Complete copies of public pleadings, the Court's rulings, and other filings are available for review and copying at the Clerk's office. The address is U.S. District Court, Northern District of California, United States Courthouse, 450 Golden Gate Avenue, San Francisco, California 94102. Judge Araceli Martínez-Olguín of the United States District Court for the Northern District of California is overseeing the Action.

Information about the Action is also available on the case website at www.PSNDigitalGamesSettlement.com or you can call the Notice Administrator toll-free at (877)-777-9145.

Do not contact the Court, Judge Martínez-Olguín, or Defendant regarding the Settlement.

For more information, call the Notice Administrator at (877)-777-9145 or go to www.PSNDigitalGamesSettlement.com.

EXHIBIT E



Settlement Administration Data Protection Checklist

Category	Control / Question	Response
Limitation on Use of Data	Affirmation that data provided to the administrator for purposes of notice, settlement, or award administration will be used solely for settlement implementation and for no other purpose	All data provided directly to A.B. Data will be used solely for the purpose of effecting the terms of the Settlement. A.B. Data will not use such information or information to be provided by Settlement Class Members for any other purpose than the administration of the Settlement in this Action; specifically the information provided will not be used, disseminated, or disclosed by or to any other person/entity for any other purpose.
Technical Controls	Firewalls and intrusion detection/prevention systems	A.B. Data uses modern next generation firewall systems which include intrusion detection, prevention, and alerting functions. A.B. Data's Information Security Policy requires firewalls be configured for intrusion detection and alerting of incidents to the A.B. Data IT department staff.
Technical Controls	Endpoint detection and response (EDR) systems	A.B. Data uses host based endpoint protection systems which are managed by the A.B. Data IT Department. These protection systems are configured to provide alerting to the IT team for security events who are in turn responsible for responding as required based on incident severity.
Technical Controls	Complex password requirements	A.B. Data requires complex passwords as part of its Information Security Policy. User accounts are required to have a minimum of 12 character passwords with alpha, numeric, and symbols along with upper and lower cases.
Technical Controls	Multi-factor authentication for access to systems and data	A.B. Data Class Action Administration Systems require Multi-Factor Authentication for access to all claims systems and data.
Technical Controls	Malware protection, anti-virus and vulnerability scanning and penetration tests	A.B. Data uses industry leading endpoint protection systems which include Malware, Anti-Virus and host based intrusion protection technologies. A.B. Data utilizes regular vulnerability testing scans on a monthly basis to detect vulnerabilities in its systems on both internal and external networks. These vulnerability scans are performed by a third party and reported back to the A.B. Data IT department for review and remediation as necessary.
Technical Controls	Data encryption (including, "encrypted at rest and in transit," "scrambled in storage," and "cell- or column-level encryption for PII" protocols)	A.B. Data's data encryption standards follow its Information Security Policy requirements such that all data is encrypted at rest on all servers, and, while in transit, must meet encryption standards of AES256 bit or greater.
Technical Controls	"Key management" for access to encrypted databases (e.g., using a hardware security module (HSM) or a key management service (KMS))	A.B. Data utilizes a KMS (Key Management System) for encrypted databases.

Category	Control / Question	Response
Technical Controls	Access only provided on need-to-know basis	A. B. Data Group uses the “Least Privilege” security model, whereby all user accounts are granted no security permissions by default and only given the least level of security permissions necessary to properly complete user assigned work duties as defined by the specific department management.
Administrative Policies	Personnel and support staff risk assessment and management, including pre-hire background checks and screening processes	All employees must pass a pre-employment background check, including a lawful ten-year criminal record review, employment verification, education verification (if required by position), and credit history. In addition, substance testing is a hiring requirement.
Administrative Policies	Personnel and support staff required to enter into non-disclosure and confidentiality agreements	All employees must sign a Confidentiality Agreement ensuring they will recognize their responsibilities in upholding confidential information accessed using data and resources through A.B. Data's networks, databases, and all technology systems. All employees must also sign a Non-Compete, Trade Secret, Proprietary and Confidential Information Non-Disclosure Agreement. This agreement requires the employee to understand, acknowledge, and agree to all the covenants and conditions not to compete and not to disclose proprietary information without consequences for any violation.
Administrative Policies	Access controls to systems and data, including guidance for granting, modifying, and reviewing access rights	A.B. Data access, modifications and removal is authorized by human resources and managed by its IT department. Access permissions are reviewed and approved by management.
Administrative Policies	Information security and privacy policy trainings, including policy review, best practices, and data security	A.B. Data requires annual Security Awareness Trainings of all employees and upon hire. These trainings cover existing and new security policy changes to the organization. The Information Security Policy is reviewed annually by A.B. Data's Security and Compliance team ensuring it is meeting industry best practices and procedures for the industry. Additional security trainings are required for roles that require elevated levels of data access.
Administrative Policies	No remote access to systems for employees	A.B. Data allows certain employees remote access privileges to its systems as required for performance of their job duties. All remote access utilizes two-factor authentication.
Administrative Policies	Exit interviews/confirmation that terminated/departed employees are immediately cut off from access	A.B. Data's termination procedures require all user account access be removed immediately upon termination. A.B. Data's IT Department is required upon receipt of termination notification to disable account and system access (physical and logical) within one (1) hour, 24 hours per day, 7 days per week.
Administrative Policies	Robust audits of data privacy policies by third-party vendors	A.B. Data currently holds SOC1 SSAE18 annual audit by third part auditors who review its policies annually. Additionally, A.B. Data is currently in the process of obtaining a SOC2 audit report in 2023.
Administrative Policies	Accreditation in accordance with ISO 27001 and SOC2 (among the industry standards listed below)	A.B. Data currently holds SOC1 SSAE18 annual audit by third part auditors who review its policies annually. Additionally, A.B. Data is currently in the process of obtaining a SOC2 audit report in 2023.

Category	Control / Question	Response
Administrative Policies	Disclosure of external certifications and any notice of expiration	A.B. Data may only disclose certifications and expirations upon written request.
Crisis and Risk Management	Incident response / "disaster plan" for immediate response to security incidents such as data breach	A.B. Data has a formal written Incident Response Policy which addresses immediate security incidents. This plan addresses all levels of response and coordination which include management, security response teams, and law enforcement if required.
Crisis and Risk Management	Process and timing for notification to attorneys, claimants, and other stakeholders of a data breach and consideration of resources and/or remedies to provide thereto	A.B. Data has a formal written Incident Response Policy which addresses immediate security incidents. This plan addresses all levels of response and coordination which include management, security response teams, external partners, and law enforcement if required.
Crisis and Risk Management	Vendor management program that determines and defines requirements to manage risk associated with outsourcing	A.B. Data has a formal vendor management and risk management policy which defines requirements for vendors of A.B. Data. This policy is available for review upon request.
Physical Access Controls	Physical Access Security - Security Guards	A.B. Data contracts physical security monitoring to an accredited alarm monitoring company. As part of this contract, A.B. Data has access to security guards on patrol who will respond to issues at our facilities.
Physical Access Controls	Physical Access Security - Access cards to facilities with assignment of identification card subject to approval and review	A.B. Data utilizes access control cards (ACS) and identification cards to control physical access to its facilities. Cards are only issued through a management approval process.
Physical Access Controls	Physical Access Security - Logs of access	A.B. Data retains logs of all access to/from our facilities.
Physical Access Controls	Alarm Systems	AB Data utilizes multiple alarm systems which offer intrusion, fire, and duress alarms. These systems are monitored by certified third party monitoring companies and respond to alarms on a 24 hour basis, 7 days a week, 365 days per year.
Physical Access Controls	CCTV recording systems	AB Data manages CCTV and recording systems in house through its IT department management. Video recordings are maintained for 90 days for review retention. All building external entrances and exits are covered by CCTV recordings. In our datacenter, additional coverage is monitoring all exits and entrances along with coverage views of critical equipment and systems. All systems are maintained under a battery and generator power backup to ensure continuous coverage.
Data Collection and Retention	Minimization of collection of personally identifiable information, e.g., social security numbers and banking information	A.B. Data only requests information that is needed for purposes of settlement administration and approved by the Court. Typically complete social security numbers and banking information are not required.
Data Collection and Retention	Data collection only required to extent necessary for settlement administration	A.B. Data only requests information that is needed for purposes of settlement administration and approved by the Court. Typically complete social security numbers and banking information are not required.
Data Collection and Retention	Various methods for ensuring data protection and security - Data classification (including implementation of appropriate safeguards to protect from theft, loss, and/or unauthorized disclosure, use, access, destruction)	A.B. Data's Information Security Policy addresses all data classification and protection policies and procedures. Additionally A.B. Data's staff sign confidentiality and privacy agreements to ensure data is handled appropriately. These policies are available for review upon request.

Category	Control / Question	Response
Data Collection and Retention	Various methods for ensuring data protection and security - Compliance with applicable laws and regulations (see below)	A.B. Data's Information Security Policy addresses all data compliance and regulatory protections. These policies are available for review upon request.
Data Collection and Retention	Various methods for ensuring data protection and security - Secure Data Transfer	A.B. Data requires all data transfers to follow industry standard security requirements. A.B. Data's Information Security Policy details these requirements, which include use of encryption during data transfers along with additional security measures.
Data Destruction	Preservation of data only for so long as required for administration of the settlement and any relevant reporting required following the payments or distributions	A.B. Data retains settlement administration data based on the requirements set forth in relevant Court Order and/or client agreements. If no guidance is provided, A.B. Data destroys all data when no longer needed for purposes of settlement administration.
Data Destruction	Secure data destruction (e.g., 6 months – 1 year or when no longer required)	A.B. Data retains settlement administration data based on the requirements set forth in relevant Court orders and/or client agreements. If no guidance is provided, A.B. Data destroys all data when no longer needed for purposes of settlement administration.
Data Destruction	Physical media (e.g., paper, CDs) shredded or destroyed to point where they cannot be reconstructed	A.B. Data's Information Security Policy details physical media destruction requirements which meet industry standards. Electronic media that is being retired from service must be erased using the NIST Data Destruction Standard 800-88 Media Sanitation Procedures. If media is no longer functional, the media must be physically destroyed via shredding, degaussing, hammer, or other physical method to make the media fully unusable and severely difficult for physical reconstruction.
Data Destruction	Destruction of all derivative copies and/or back-ups	A.B. Data's Information Security Policy details physical media destruction requirements which meet industry standards. Electronic media that is being retired from service must be erased using the NIST Data Destruction Standard 800-88 Media Sanitation Procedures. If media is no longer functional, the media must be physically destroyed via shredding, degaussing, hammer, or other physical method to make the media fully unusable and severely difficult for physical reconstruction.
Applicable Laws, Standards, and Other Regulation	Industry standards: National Institute of Standards and Technology (NIST), HIPAA, FISMA, System and Organization Controls (SOC1 and SOC2) or more advanced assessment, ISO 27001	A.B. Data follows all applicable local, national, and international privacy regulations. A.B. Data's security team facilitates and monitors compliance with privacy policies.
Applicable Laws, Standards, and Other Regulation	Local, national, international privacy regulations (including CCPA)	A.B. Data follows all applicable local, national, and international privacy regulations. A.B. Data's security team facilitates and monitors compliance with privacy policies.
Ethical Rules	Administrative policies and/or employee handbook incorporating commitment to ethical rules (e.g., company, court ethical rules) setting forth standards of ethical and legal behavior	All employees are subject to the terms of A.B. Data's Employee Handbook which outlines all employee administrative policies, obligations, and requirements.
Ethical Rules	Enforcement clauses, violation resulting in disciplinary action including and up to termination of employment	Consequences of employee breaches of administrative policies is subject to management discretion.
Customer Service Measures	Description of settlement website and posting thereto of relevant privacy policies or statements (including portal for reporting suspected loss of confidential data submitted with claim)	All settlement websites contain a link to A.B. Data's privacy policy and, for dynamic websites where A.B. Data collects data, A.B. Data utilize an SSL certificate that authenticates a website's identity and enables an encrypted connection.

Category	Control / Question	Response
Customer Service Measures	Explanation of role of claims administrator and how to prevent phishing (e.g., clear indication that administrator will not request confidential information by e-mail and how to identify a valid email sent from the administrator)	Emails sent to class members are written in concise language, contain prominent links to the settlement website, and include an explanation of how the email is related to a court-approved settlement. A.B. Data never requests that confidential information be sent over email. A.B. Data also implements certain best practices when disseminating email to minimize confusion and maximize deliverability. For example, the subject line, the sender, and the body of the message will be designed to overcome SPAM filters and encourage readership. Emails are sent in an embedded html text format without graphics, tables, images, attachments, and other elements that would increase the likelihood that the message could be blocked by an e-mail service provider or labeled as SPAM. Emails are also transmitted with a digital signature to the header and content, which allows e-mail service providers to programmatically authenticate that the emails are from A.B. Data's authorized mail servers.