

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4

5 AGUSTIN CACCURI,
6 Plaintiff,

7 v.
8

9 SONY INTERACTIVE
10 ENTERTAINMENT LLC,
11 Defendant.
12

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

**SUPPLEMENTAL DECLARATION OF
ERIC J. MILLER REGARDING
NOTICE AND ADMINISTRATION
COSTS**

13
14 I, Eric J. Miller, declare as follows:

15 1. I am the Senior Vice President of A.B. Data, Ltd.’s Class Action Administration Company
16 (“A.B. Data”), whose corporate office is located in Milwaukee, Wisconsin. My business address is 5080 PGA
17 Boulevard, Suite 209, Palm Beach Gardens, FL 33418, and my telephone number is 561-336-1801.

18 2. This Supplemental Declaration is submitted in connection with the above-referenced action
19 (the “Action”) and supplements my Declaration of Eric J. Miller Regarding Dissemination of Notice filed on
20 June 17, 2026 (the “Original Declaration”). This Supplemental Declaration addresses the costs incurred by
21 A.B. Data in connection with notice dissemination and settlement administration efforts. This Declaration is
22 based upon my personal knowledge and upon the information provided by my associates and staff members. I
23 have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify
24 competently thereto.
25

26 3. Pursuant to the Court’s Order Granting Preliminary Approval of Class Settlement, A.B. Data
27 has been responsible for effectuating notice and performing various settlement administration services as
28

1 detailed in the Original Declaration and as contemplated by the Settlement Agreement. In performing these
2 obligations, A.B. Data has incurred costs and expenses on behalf of the Settlement Class.

3 4. Through August 15, 2026, A.B. Data has incurred \$162,586.83 in costs related to notice. These
4 costs encompass the expenses associated with the direct email notice campaign, print and digital media
5 advertising, earned media outreach, website development and maintenance, and the establishment and
6 operation of the toll-free helpline, all as described in the Original Declaration.

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8 5. Through August 15, 2026, A.B. Data has also incurred costs of \$4,110.73 concerning
9 settlement administration. These costs relate to administrative functions necessary to support the ongoing
10 implementation and management of the Settlement, including but not limited to the planning, coordination,
11 and preparation required for settlement administration efforts.

12 6. In connection with the proposed Settlement terms, A.B. Data will incur additional costs related
13 to the delivery of PSN account credits to eligible PSN accounts in coordination with Sony Interactive
14 Entertainment (“SIE”). For Settlement Class Members with eligible claims who no longer maintain active PSN
15 accounts, A.B. Data will incur costs associated with issuing and mailing settlement checks to their mailing
16 addresses on file. These costs will include the expenses related to check processing, printing, and delivery via
17 U.S. Mail.

18
19 7. Additionally, A.B. Data will continue to incur costs maintaining and operating the case-specific
20 website (www.PSNDigitalGamesSettlement.com), the toll-free call center (1-877-777-9145), and ongoing
21 communications with Settlement Class Members throughout the remainder of the administration period and
22 following distribution of settlement benefits. These continuing operational costs are necessary to ensure that
23 Settlement Class Members have continued access to information about their settlement benefits and to address
24 any inquiries or issues that may arise during and after the distribution process.

25 8. The Administration costs are estimated to be between \$180,000 and \$190,000 in total. This
26 estimate includes costs for notice dissemination, settlement administration, payments to class members with
27 inactive PSN accounts and PSN account credit delivery and coordination.
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2 I declare under penalty of perjury that the foregoing is true and correct.

3 Executed this 3rd day of September 2026.
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Eric J. Miller