IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

CLAUDIA NEWTON and BRANDY LEANDRO, on behalf of themselves and all others similarly situated, Plaintiffs, v. R.C. BIGELOW INC. and DOES 1 through 10, Defendants.	Case No.: 2:22-cv-5660-LDH-SIL **DECLARATION OF GINA INTREPIDO-BOWDEN REGARDING PROPOSED SETTLEMENT NOTICE AND ADMINISTRATION PLAN**

I, GINA INTREPIDO-BOWDEN, declare as follows:

1. I am a Vice President at JND Legal Administration ("JND"). I am a judicially recognized legal notice expert with more than 20 years of experience designing and implementing class action legal notice programs. I have been involved in many of the largest and most complex class action notice programs, including all aspects of notice dissemination. A comprehensive description of my experience is attached as **Exhibit A**.

2. JND served as the Administrator and implemented dissemination of the class notice of pendency in the above-captioned action, as ordered by the Court in its *Order Granting Plaintiffs' Unopposed Motion for Approval of Class Notice Plan* dated July 22, 2025 (Doc No. 57). JND's costs for providing this notice were $63,804.60.

3. I previously submitted a declaration regarding the proposed class notice of pendency plan on April 28, 2025 (the "Class Notice Plan") (Doc No. 54-2) and a declaration regarding the completion of that Class Notice Plan on November 14, 2025 (Doc. No. 62). JND's background and experience was provided in the Class Notice Plan declaration. *See* Doc No. 54-2 ¶¶ 3-10.

4. I submit this Declaration at the request of the Parties in the above-referenced action to describe the proposed plan for providing notice of settlement to Settlement Class Members (the "Settlement Notice Plan"), address why it is consistent with other best practicable court-approved notice programs and the requirements of Rule 23 of the Federal Rules of Civil Procedure ("Rule 23"), the Due Process Clause of the United States Constitution, and the Federal Judicial Center ("FJC") guidelines for best practicable due process notice, and to summarize the settlement administration process.

SETTLEMENT NOTICE PLAN OVERVIEW

5. The objective of the proposed Settlement Notice Plan is to provide the best notice practicable, consistent with the methods and tools employed in other court-approved notice programs and to allow Settlement Class Members the opportunity to review a plain language notice with the ability to easily take the next step and learn more about the settlement. The FJC's *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide* consider a notice plan with a high reach (70% or above) to be effective.[1]

6. The Settlement Class consists of purchasers of any Bigelow Tea Products at a retail store in New York any time from February 20, 2020 to August 5, 2021. Bigelow Tea Products include any 18/20 count box of Bigelow Earl Grey Black Tea Caffeine, Green Tea Caffeine, Constant Comment Black Tea Caffeine, Green Lemon Tea Caffeine, Vanilla Chai Black Tea Caffeine, English Tea Time Black Tea Caffeine, Spiced Chai Black Tea Caffeine, French Vanilla Black Tea Caffeine, Vanilla Caramel Black Tea Caffeine, Cozy Chamomile, Lemon Ginger, Lavender Chamomile, Sweet Dreams, or Orange & Spice, labeled as "Manufactured in the USA 100% American Family Owned."

[1] Reach is the percentage of a specific population group exposed to a media vehicle or a combination of media vehicles containing a notice at least once over the course of a campaign. Reach factors out duplication, representing total different/net persons.

7. The proposed Settlement Notice Plan mirrors the Class Notice Plan, as further described in the sections below:

a. Email notice to all Settlement Class Members for whom Bigelow previously provided email addresses;

b. Mailed notice to all Settlement Class Members for whom Bigelow previously provided mailing addresses;

c. Digital notice with the leading digital network (Google Display Network – "GDN") and the top social platform (Facebook);

d. An internet search campaign;

e. A case website that will provide detailed information about the settlement with the ability to file a Claim Form through a secure portal, including a page with answers to frequently asked questions, contact information, key dates, links to important case documents including the Long Form Notice and the Settlement Agreement;

f. A case toll-free number with an interactive voice response (IVR), an email address, and a post office box.

8. Based on my experience in developing and implementing notice programs, I believe the proposed Settlement Notice Plan will provide the best notice practicable under the circumstances.

9. Each component of the proposed Settlement Notice Plan is described in more detail in the sections below.

DIRECT NOTICE

10. An adequate notice plan needs to satisfy "due process" when reaching a class. The United States Supreme Court, in *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156 (1974), stated that direct notice (when possible) is the preferred method for reaching a class. In addition, Rule 23(c)(2) of the Federal Rules of Civil Procedure provides that "the court must direct to class members the best notice that is practicable under the circumstances, including individual notice

to all members who can be identified through reasonable effort. The notice may be by one or more of the following: United States mail, electronic means, or other appropriate means."

11. As a result, email notice will be sent to all Settlement Class Members for whom Bigelow previously provided email addresses (i.e., 5,752 unique potential Settlement Class Members) and mailed notice will be sent to all Settlement Class Members for whom Bigelow previously provided mailing addressed (i.e., 62 unique potential Settlement Class Members). It is important to note that the proposed digital effort will independently meet all notice requirements, as explained below.

12. A copy of the Direct Notice is attached to the Settlement Agreement as Exhibit 3.

DIGITAL PLAN

13. The vast majority of Settlement Class Members are unknown; therefore, JND designed a six-week digital campaign that is estimated to reach 70% of likely Settlement Class Members. The proposed digital plan mirrors the digital effort implemented for the Class Notice Plan.

Media Resources

14. JND utilizes the most reputable advertising media research tools to ensure that the best media is selected and that our reach calculations can withstand the most critical review and challenge. The media research tools we utilized in our analysis and will use to implement the media campaign include MRI, ComScore, Google Active View, Google Analytics, and Google Tag Manager.

15. MRI data was used to analyze the demographics and media usage of potential Settlement Class Members. Understanding who we are trying to reach is key in determining how best to reach them. MRI is a nationally accredited research firm that provides consumer demographics, product and brand usage, and audience/exposure in all forms of advertising media through probabilistic and address-based sampling. MRI is the top producer of media/consumer research in the United States.

16. Comscore's multi-reach platform was used to analyze unduplicated audiences (net reach) across multiple platforms (e.g., Google, Facebook) and devices (desktop and mobile). Through the platform, we assess the efficiency and effectiveness of our media plans by reducing waste and improving campaign performance across all devices.

17. At the time of implementation, our digital experts will verify and monitor our digital placements. Google Active View, which is accredited by the Media Rating Council (MRC), will be used to measure viewable impressions across the web and in apps. Google Active View supports the Interactive Advertising Bureau (IAB) and MRC definition of viewability — a minimum of 50% of the ad is in view for a minimum of one second for display ads. In addition, over a hundred complex algorithms will be used to spot bad traffic as it happens to prevent invalid clicks, impressions, views, or interactions. These efforts prevent impressions from being served and counted when they have not been loaded onto a person's screen.

18. JND will place a Google Analytics pixel across all case landing pages to monitor and track website traffic. Through the use of Google Analytics and custom UTM codes, our digital experts will be able to monitor the number of website visits, average time spent per visit, and the number of pages visited per session. Data will be broken down by source, or referring website, in order to make optimizations based on media placements that are driving the longest time on site. Demographic data such as age and gender, will be reviewed and optimized towards those groups who prove to be the most interactive with the case website.

19. JND will also place a 'Container Tag' across all case landing pages using Google Tag Manager, a tag management system (TMS) that allows advertisers to place and update measurement codes and code fragments on a landing page from a single source. With these codes placed within the container, website data is passed back to advertising platforms, allowing machine learning to take place, optimizing towards placements and audiences that are driving site traffic. All data collected through Google Tag Manager adheres to Google's Privacy Policies and Principles. No personal identifiable information (PII) is collected.

Target Analysis

20. JND analyzed the demographics and media usage of potential Settlement Class Members to determine how best to reach them. MRI was studied among New York adults 18 years of age or older (NY Adults 18+) who used Bigelow tea ("NY Bigelow Tea Users"), because this measurable target best represents potential Settlement Class Members.

21. Among other things, MRI data indicates that most NY Bigelow Tea Users are 35 years of age or older (73%); from higher income households (73% have a household income of $60K+); and homeowners (65%).

22. Compared to the general Adult 18+ population, NY Bigelow Tea Users are 45% more likely to have a Master's degree and 19% more likely to have a Bachelor's degree; 17% more likely to be 65 years of age or older; 15% more likely to have a household income of $75,000 or more, and 12% more likely to have never married.

23. In terms of media usage, MRI data indicates that NY Bigelow Tea Users are active internet users with 97% on the internet in a 30-day period; 88% using their cellphone or smartphone to access the internet; and 59% visiting Facebook in a 30-day period.

24. JND considered these and other key demographics and media usage when designing our Notice Plan and selecting targets.

Digital Notice

25. JND proposes serving approximately **31 million digital impressions** to NY Adults 18+ with focused targeting included.[2]

26. A large portion of the GDN impressions will be allocated to (1) users *in-market* for tea collection, chai tea products; (2) users who searched *keywords* such as drinking tea,

[2] Impressions or Exposures are the total number of opportunities to be exposed to a media vehicle or combination of media vehicles containing a notice. Impressions are a gross or cumulative number that may include the same person more than once. As a result, impressions can and often do exceed the population size.

Bigelow green tea, tea products, Bigelow tea; and/or (3) those who *browse websites* similar to www.BigelowTea.com.

27. Facebook activity will be directed to users interested in Bigelow Tea Company, green tea, and tea.

28. Multiple targeting strategies will be used, including the following techniques:

a. *Predictive Targeting* (GDN only) uses multiple data points (search queries, sites visited, and digital behavior trends) to make inferences regarding future behavior/performance for a given campaign.

b. *Audience Targeting* optimizes efforts based on demographics, behavior, and interests of potential Settlement Class Members.

c. *Contextual Targeting* is the practice of displaying a digital ad based on a website's content.

d. *Geotargeting* optimizes efforts based on the location of potential Settlement Class Members.

e. *Keyword Targeting* allows advertisers to target users based on their search queries, recent social media posts or engagement with websites or posts that feature specific keywords.

f. *Look-a-like Targeting* (LAL) to individuals whose characteristics match that of individuals who have visited the case website and/or submitted an online claim. Data that JND collected during the Class Notice Plan will also be used.

g. *Site Retargeting* (RTG) to individuals who previously visited the Class Notice Plan case website implemented by JND, reaching them while they browse other sites over the course of the campaign. This technique allows JND to provide additional notice exposure to individuals who have previously shown an interest in the case.

29. The digital activity will be served across all devices (desktop, laptop, tablet and mobile), with an emphasis on mobile devices. The digital ads will directly link to the case

website, where Settlement Class Members may access more information about the settlement, including the Long Form Notice, as well as file a claim electronically.

30. A copy of the digital ads is attached as **Exhibit B**.

INTERNET SEARCH

31. Given that web browsers frequently default to a search engine page, search engines are a common source to get to a specific website (i.e., as opposed to typing the desired URL in the navigation bar). As a result, JND proposes a Google search effort to assist interested Settlement Class Members in finding the case website. A custom keyword and ad group list will be generated based on content on the case website landing page, as well as other case information. Keywords are words/phrases that are bid on when they match the search term (or a variation of the search term) a person types into their Google search bar. When a search term matches a keyword or phrase, a Responsive Search Ad (RSA) may be served, generating a tailored message relevant to the search term. RSAs utilize machine learning to pair various combinations of ad copy (headlines and descriptions) based on which groupings have worked well previously (i.e., produced a strong CTR/conversion performance), and what the platform anticipates will generate the ideal results from the unique searcher. When the RSA is clicked on, the visitor will be redirected to the case website where they can get more information, as well as file a claim electronically.

32. Samples of RSAs are attached as **Exhibit C**.

CASE WEBSITE

33. JND will update the existing case-specific website, www.NYTeaClassAction.com, so that Settlement Class Members may obtain more information about the settlement. The updated case website will have an easy-to-navigate design that will be formatted to emphasize important information and deadlines and will provide links to important case documents, including the Settlement Agreement and Long Form Notice (attached to the Settlement Agreement as Exhibit 4), and will allow Settlement Class Members to file an online claim (attached to the Settlement Agreement as Exhibit 1) or print a Claim Form (attached to the

Settlement Agreement as Exhibit 2**)**, to submit by mail. The case website is prominently displayed in all printed notice documents and will be accessible through the digital notices.

34. The case website will be ADA-compliant and optimized for mobile visitors so that information loads quickly on mobile devices. It will be designed to maximize search engine optimization through Google and other search engines.

TOLL-FREE NUMBER, EMAIL ADDRESS, AND POST OFFICE BOX

35. JND will update the automated toll-free telephone line, 1-877-206-2315, so that Settlement Class Members may call for information related to the settlement. The telephone line will have an IVR available 24 hours a day, seven days a week.

36. JND will continue to maintain the dedicated email address and post office box where Settlement Class Members may send correspondence and exclusion requests.

NOTICE DESIGN

37. The proposed notice documents are designed to comply with Rule 23's guidelines for class action notices and the FJC's *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide*. The notices state Settlement Class Members' rights and options and clearly and concisely in plain, easily understood language and contain easy-to-read summaries of the instructions on how to obtain more information about the settlement. Courts routinely approve notices that have been written and designed in a similar manner.

REACH

38. To calculate media reach, JND used a Comscore reach and frequency platform. According to this reputable media reach platform, the proposed digital effort will reach approximately 70% of likely Settlement Class Members. The direct notice effort and the internet search campaign will extend reach further. The provided reach is similar to that of other court approved programs and meets the standard set forth by the FJC.[3]

[3] Federal Judicial Center, *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide* (2010), p. 3 states: "…the lynchpin in an objective determination of the

ADMINISTRATION AND DISTRIBUTION OF PAYMENTS

39. JND will also be responsible for administering the settlement, which includes, *inter alia*, answering inquiries from Settlement Class Members; receiving and maintaining correspondence regarding the Settlement Agreement; posting notices, the Settlement Agreement, Claim Forms, and other related documents on the case website and otherwise maintaining the case website; receiving and processing Claim Forms and Requests for Exclusion, including conducting fraud review, and rejecting notices for potential invalid/fraudulent Claims; and distributing all payments under the settlement.

40. Among other things, JND will review and process claims, and conduct a fraud review to ensure that only legitimate Claims are paid. JND's claim validation and fraud review procedures are performed entirely by JND personnel. In addition to JND's proprietary fraud detection protocols, our online claim filing sites utilize hCaptcha, a next-generation third-party fraud protection solution that employs cutting-edge AI and machine-learning technology that runs continuously to assist in the detection and prevention of fraudulent claim filings. Our review threshold, expected denial rate and false-positive handling are highly dependent on numerous specific case factors, including how attractive the case is to bad actors. We will establish specific thresholds and tailer our protocols for the case, once we have a sense of the actual response to the notice in this matter.

41. Should the Court grant final approval, JND will also distribute Settlement Benefits to Claimants. Any Unclaimed Settlement Benefits will be paid to the Court approved *Cy Pres* Recipient. *Cy Pres* distribution is appropriate because a second distribution would be cost prohibitive, as only paper checks and PayPal payments require Claimants to take custody of the Settlement Benefits, and it is unlikely that the amount of Unclaimed Settlement Benefits will cover administration costs and expenses required for a second round of distribution and adequate funding to issue non-nominal second payments to Settlement Class Members.

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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%."

COSTS

42. Settlement Notice and Administration Costs are estimated to be $188,000 and will not exceed $230,000 unless otherwise agreed to by the Parties for good cause and expressly approved by the Court.

CONCLUSION

43. In my opinion, the proposed Settlement Notice Plan provides the best notice practicable under the circumstances and is consistent with the requirements of Rule 23 and other similar court-approved notice programs. The Settlement Notice Plan is designed to provide Settlement Class Members with the opportunity to review the notice and the ability to easily take next steps to learn more about the settlement.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 31st day of August, 2026 in Stone Harbor, NJ.



Gina Intrepido-Bowden

- EXHIBIT A -

GINA INTREPIDO-BOWDEN

VICE PRESIDENT

JND



I. INTRODUCTION

Gina Intrepido-Bowden is a Vice President at JND Legal Administration ("JND"). She is a court recognized legal notice expert who has been involved in the design and implementation of hundreds of legal notice programs reaching class members/claimants throughout the U.S., Canada, and the world, with plain language notices in over 35 languages. Some notable cases in which Gina has been involved include:

- *Brach Family Found. v. AXA Equitable Life Ins. Co.*, a $307.5 million COI settlement
- *FTC v. Reckitt Benckiser Grp. PLC*, the $50 million Suboxone branded drug antitrust settlement
- *In re Blue Cross Blue Shield Antitrust Litig.*, a $2.67 billion antitrust settlement providing notice to class members via an extensive direct notice effort supplemented by a media campaign consisting of print, television, radio, internet, and more
- *In re Packaged Seafood Products Antitrust Litigation*, the $152.2 million end purchaser settlements, involving two robust media programs, as well as the direct purchaser settlements, involving two extensive direct notice efforts
- *In re General Motors LLC Ignition Switch Litig.*, the $120 million GM Ignition Switch economic settlement
- *In re Home Depot, Inc., Customer Data Sec. Breach Litig.*, a security breach impacting over 40 million consumers who made credit/debit card purchases in a Home Depot store
- *In re Residential Schools Litig.*, a complex Canadian class action incorporating a groundbreaking notice program to remote aboriginal persons qualified to receive benefits in the multi-billion-dollar settlement

- *In re Royal Ahold Sec. and "ERISA"*, a $1.1 billion securities settlement involving a comprehensive international notice effort
- *In re Skelaxin (Metaxalone) Antitrust Litig.*, a prescription antitrust involving notice to both third party payor and consumer purchasers
- *In re TJX Cos., Inc. Retail Sec. Breach Litig.*, this $200 million settlement impacted 45 million credit/debit cards in the U.S. and Canada making it the then-largest theft of consumer data
- *In re Trans Union Corp. Privacy Litig.*, a $75 million data breach settlement involving persons with a credit history
- *Senne v. Office of the Comm'r of Baseball*, a $185 million settlement providing compensation to nearly 25,000 minor league baseball players
- *The National Association of Realtors Settlements*, involving multiple antitrust settlements with various realtors totaling over $1 billion thus far
- *Thompson v Metropolitan Life Ins. Co.*, a large race-based pricing settlement involving 25 million policyholders
- *USC Student Health Ctr. Settlement*, a $215 million settlement providing compensation to women who were sexually assaulted, harassed and otherwise abused by Dr. George M. Tyndall
- *Williams v. Weyerhaeuser Co.*, a consumer fraud litigation involving exterior hardboard siding on homes and other structures

With more than 30 years of advertising research, planning and buying experience, Gina began her career working for one of New York's largest advertising agency media departments (BBDO), where she designed multi-million-dollar media campaigns for clients such as Gillette, GE, Dupont, and HBO. Since 2000, she has applied her media skills to the legal notification industry, working for several large legal notification firms. Gina is an accomplished author and speaker on class notice issues including effective reach, notice dissemination, as well as noticing trends and innovations. She earned a Bachelor of Arts in Advertising from Penn State University, graduating *summa cum laude*.

II. JUDICIAL RECOGNITION

Courts have favorably recognized Ms. Intrepido-Bowden's work as outlined by the sampling of Judicial comments below:

1. Honorable Linda S. Jamieson, J.S.C.

Goldstein v. Houlihan/Lawrence Inc., (August 13, 2025)

No. 60767/2018 (N.Y. Super. Ct.):

At preliminary approval, the Court appointed JND Legal Administration ("JND") as the Settlement Administrator. (Dkt. 2307) . . . Now at the final approval stage, Plaintiffs submitted with their motion a declaration of Gina Intrepido-Bowden from JND summarizing the notice that was given to Settlement Class members and the resulting opt-outs and objections . . . As shown in the Intrepido-Bowden Declaration, the direct notice program was extremely successful, reaching more than 93% of the Settlement Class members . . . Based on the record, the Court finds that the notice given to the Settlement Class constituted the best notice practicable under the circumstances and fully satisfied the requirements of due process, CPLR § 908, and all applicable law.

2. Honorable Terrence G. Berg

Chapman v Gen. Motors, LLC, (May 6, 2025)

No. 19-CV-12333-TGB-DRG (E.D. Mich.):

The Settlement Claims Administrator, JND Legal Administration LLC ("JND"), also placed the Notice on the settlement website. The direct notice effort successfully delivered notice to 375,728 Class Members, or 96 percent of the known Class. The direct notice effort alone reached virtually all potential Class Members. The supplemental digital effort, internet search campaign, and press release further enhance that reach. Thus, notice has been given in an adequate and sufficient manner, constitutes the best notice practicable under the circumstances, and satisfies all requirements of Rule 23(e) and due process.

3. Honorable Joseph H. Rodriguez

Cohen v. Subaru Corp., (July 11, 2024)

No. 20-cv-8442-JHR-AMD (D.N.J.):

The Court appoints JND Legal Administration as the Settlement Administrator ("Settlement Administrator")...The notices and Notice Program satisfy all applicable requirements of law, including, but not limited to, Rule 23 and the constitutional requirement of due process.

4. Judge Stephen R. Bough

Burnett v. Nat'l Assoc. of Realtors **- Partial Settlement with Nat'l Assoc. of Realtors,** (November 27, 2024)

No. 19-CV-00332-SRB (W.D. Mo.):

At preliminary approval, the Court appointed JND Legal Administration ("JND") as the Settlement Administrator…As directed by the Court, JND implemented the Class Notice Plan. Notice was provided by first-class U.S. mail, electronic mail, and digital and print publication. As stated in that declaration, nearly 40 million direct notices were mailed or emailed to the Class. JND's digital notice effort delivered more than 300 million impressions. More than 500 news stories addressed the litigation and settlement, including full articles in outlets such as the ABC News, CBS News, NBC News, and the New York Times. The Court finds that the direct notice program was adequate and reached more than 99% of identified Settlement Class members.

5. Honorable Dana M. Sabraw

In re Packaged Seafood Prods. Antitrust Litig. **(EPP Class),** (November 22, 2024)

No. 15-md-02670 (S.D. Cal.):

The EPPs again retained JND, an experienced and well-respected claims administrator. The Court previously approved JND as Claims Administrator for the COSI Settlement and to disseminate the Class Notice…The Settlement Notice Plan, approved by the Court's Preliminary Approval Order, was robust and provided the Settlement Class Notice (in various forms) to Settlement Class Members…The digital and print efforts alone reached more than 70% of potential Settlement Class Members and further extended by Mail Notice.

6. Judge Stephen R. Bough

Gibson v. The Nat'l Assoc. of Realtors, (November 4, 2024)

No. 23-cv-00788-SRB (W.D. Miss.):

At preliminary approval, the Court appointed JND Legal Administration ("JND") as the Settlement Administrator. As directed by the Court, JND implemented the Class Notice Plan. Notice was provided by first-class U.S. mail, electronic mail, and digital and print publication…the direct notice program was extremely successful and reached more than 97% of identified Settlement Class members. Nearly 40 million direct notices were mailed or emailed to the Class. JND's digital effort alone delivered more than 300 million impressions, and its press release was picked up at least 495 times with a potential audience of 113 million. In addition to the formal class notice process, and beyond the paid press release, more than 470 news stories addressed the litigation and settlement, including full articles in outlets such as the New York Times, USAToday, and CNN…Based on the record, the Court finds that the notice given to the Settlement Class constituted the best notice practicable under the circumstances and fully satisfied

the requirements of due process, Federal Rule of Civil Procedure 23, and all applicable law. The Court further finds that the notice given to the Settlement Class was adequate and reasonable.

7. Honorable Philip S. Gutierrez

Grey Fox, LLC v. Plains All Am. Pipeline, L.P., (September 17, 2024)

No. 16-cv-03157-PSG-JEM (C.D. Cal.):

The Court finds that the Notice set forth in Article XI of the Settlement Agreement, detailed in the Notice Plan attached to the Declaration of Gina Intrepido-Bowden of JND Legal Administration, and effectuated pursuant to the Preliminary Approval Order: (a) constitutes the best notice practicable under the circumstances of this Action; (b) constitutes due and sufficient notice to the Classes of the terms of the Settlement Agreement and the Final Approval Hearing; and (c) fully complied with the requirements of the Federal Rules of Civil Procedure, the United States Constitution, and any other applicable law, including the Class Action Fairness Act of 2005, 28 U.S.C. § 1715.

8. Honorable Joanna Seybert

Natale v. 9199-4467 Quebec Inc., (May 14, 2024)

21-cv-6775-JS-SIL (E.D.N.Y.):

The Court further finds that the method of dissemination of notice to the Settlement Class…satisfies Rule 23, due process, and constitutes the best notice practicable under the circumstances…The Court appoints JND Legal Administration as the Settlement Administrator.

9. Honorable Philip S. Gutierrez

Grey Fox, LLC v. Plains All Am. Pipeline, L.P., (May 1, 2024)

No. 16-cv-03157-PSG-JEM (C.D. Cal.):

The Court appoints JND Legal Administration as Settlement Administrator and directs it to carry out all duties and responsibilities of the Settlement Administrator as specified in the Settlement Agreement Section VI (B) and herein…The Court approves, as to form and content, the class notices attached as Exhibits C, D, and E to the Agreement and Exhibits B, C, and D to the Declaration of Gina Intrepido-Bowden In Support of Motion for Preliminary Approval of Class Action Settlement and Direction of Notice ("Intrepido-Bowden Declaration").

10. Honorable Daniel J. Calabretta

Weiner v. Ocwen Fin. Corp., (March 28, 2024)

No. 14-cv-02597-DJC-DB (E.D. Cal.):

The Court hereby appoints JND Legal Administration as Settlement Administrator… the Court finds that the proposed Notice program meets the requirements of due process under the U.S. Constitution and Rule 23; and that such Notice program, which

includes direct notice to Settlement Class Members via e-mail and/or mail to the extent practicable, the establishment of a settlement website, the establishment of a toll-free telephone helpline, and the notice provided via internet search platforms and other online advertisements, is the best notice practicable under the circumstances and shall constitute due and sufficient notice to all persons entitled thereto.

11. Judge Barbara J. Rothstein

Moore v Robinhood Fin. LLC, (February 13, 2024)

No. 21-cv-01571-BJR (W.D. Wash.):

The Court appoints JND Legal Administration as the Settlement Administrator…The Court finds this manner of giving notice fully satisfies the requirements of Fed. R. Civ. P. 23 and due process, constitutes the best notice practicable under the circumstances, including its use of individual notice to all Settlement Class Members who can be identified with the available data and reasonable effort, and shall constitute due and sufficient notice to all persons entitled thereto.

12. Honorable Jon S. Tigar

Aberin v. Am. Honda Motor Co., Inc., (February 1, 2024)

No. 16-cv-04384-JST (N.D. Cal.):

The proposed Class Notice Program consists of (a) a mailed notice ("Class Notice," attached as Exhibit 1 to Plaintiffs' Preliminary Approval Motion), sent to the last known address of Settlement Class Members; (b) email follow-ups to each Settlement Class Member for whom email addresses are known; (c) a social-media component; (d) targeted notice based on search terms used by persons on Google; and (e) a website publication of the Settlement Agreement and Class Notice and other case-related documents at a public website with a domain name related to the action With respect to such Class Notice Program, the Court finds that such Class Notice is fair and adequate. The Court further reaffirms its findings in support of the appointment of JND Legal Administration as Notice Administrator, ECF No. 326, and now appoints JND Legal Administration to serve as Settlement Notice Administrator.

13. Judge Stephen R. Bough

Burnett v. Nat'l Assoc. of Realtors - first round of settlements with Keller Williams, Anywhere, and RE/MAX, (May 9, 2024)

No. 19-CV-00332-SRB (W.D. Mo.):

At preliminary approval, the Court appointed JND Legal Administration ("JND") as the Settlement Administrator. As directed by the Court, JND implemented the parties' Class Notice Plan…Notice was provided by first-class U.S. mail, electronic mail, and digital and print publication…The media effort alone reached at least 71 percent of the Settlement Class members….Based on the record, the Court finds that the notice given to the Settlement Class constituted the best notice practicable under the circumstances and

fully satisfied the requirements of due process, Federal Rule of Civil Procedure 23, and all applicable law. The Court further finds that the notice given to the Settlement Class was adequate and reasonable.

14. Judge Cormac J. Carney

Doe v. MindGeek USA Incorp., (January 26, 2024)

No. 21-cv-00338 (C.D. Cal.):

...the Court finds that the notice and plan satisfy the statutory and constitutional requirements because, given the nature and complexity of this case, "a multi-faceted notice plan is the best notice that is practicable under the circumstances."

15. Honorable Jesse M. Furman

City of Philadelphia v. Bank of Am. Corp., (October 12, 2023)

No. 19-CV-1608 (JMF) (S.D.N.Y.):

The Court approves the form and contents of the Short-Form and Long-Form Notices (collectively, the "Notices") attached as exhibits to the Intrepido-Bowden Declaration... In addition to directly mailing notice, JND will run digital ads targeting a custom audience using the Google Display Network (GDN) and LinkedIn in an effort to target likely Class Members...JND will cause the publication notice, attached as Exhibit F to the Intrepido-Bowden Declaration to be published in the Wall Street Journal and Investor's Business Daily. JND will also cause an informational press release, attached as Exhibit G to the Intrepido-Bowden Declaration, to be distributed to approximately 11,000 media outlets nationwide.

16. Honorable David O. Carter

Gutierrez, Jr. v. Amplify Energy Corp., (September 14, 2023)

No. 21-cv-01628-DOC-JDE (C.D. Cal.):

The Court finds that the Notice set forth in the Settlement Agreement, detailed in the Notice Plan attached to the Declaration of Gina Intrepido-Bowden of JND Legal Administration, and effectuated pursuant to the Preliminary Approval Order: (a) constitutes the best notice practicable under the circumstances of this Action; (b) constitutes due and sufficient notice to the Classes of the terms of the Settlement Agreement and the Final Approval Hearing; and (c) fully complied with the requirements of the Federal Rules of Civil Procedure, the United States Constitution, and any other applicable law, including the Class Action Fairness Act of 2005, 28 U.S.C. § 1715.

17. Chief Judge Stephanie M. Rose

PHT Holding II LLC v. N. Am. Co. for Life and Health Ins., (August 25, 2023)

No. 18-CV-00368 (S.D. Iowa):

The Court appoints JND Legal Administration LLC ("JND") as the Settlement Administrator...Pursuant to Rule 23(e)(1)(B), the Court directs that notice be provided

to Class Members through the Notices, attached as Exhibits B and C to the Declaration of Gina M. Intrepido-Bowden ("Intrepido-Bowden Declaration"), and through the notice program described in described in Section 4 of the Agreement and Paragraphs 15–20 and 31–37 of the Intrepido-Bowden Declaration. The Court finds that the manner of distribution of the Notices constitutes the best practicable notice under the circumstances as well as valid, due and sufficient notice to the Class and complies fully with the requirements of Federal Rule of Civil Procedure 23 and the due process requirements of the United States Constitution.

18. Judge Mary Kay Vyskocil

Advance Trust & Life Escrow Serv., LTA v. PHL Variable Ins. Co., (August 9, 2023) No. 18-cv-03444 (MKV) (S.D.N.Y.):

The Court appoints JND Legal Administration LLC ("JND"), which is a competent firm, as the Settlement Administrator…Pursuant to Rule 23(e)(1)(B), the Court directs that notice be provided to class members through the Notices, attached as Exhibits B-C to the Declaration of Gina M. Intrepido-Bowden (the "Intrepido-Bowden Declaration"), and through the notice program described in described in Paragraph 63 of the Agreement and Paragraphs 7-11 and 24-31 of the Intrepido-Bowden Declaration. The Court finds that the manner of distribution of the Notices constitutes the best practicable notice under the circumstances, as well as valid, due, and sufficient notice to the Class, and complies fully with the requirements of Federal Rule of Civil Procedure 23 and the due process requirements of the United States Constitution.

19. Honorable Terrence G. Berg

Chapman v. Gen. Motors, LLC, (June 29, 2023) No. 19-CV-12333-TGB-DRG (E.D. Mich.):

Pursuant to Federal Rules of Civil Procedure 23(c)(2)(B), the Court finds that the content, format, and method of disseminating Class Notice set forth in the Intrepido-Bowden Declaration, including the form and content of the proposed forms of Class Notice attached as Exhibits B (Short Form Notice), C (digital advertisements), and D (Long Form Notice) to the Intrepido-Bowden Declaration, is the best notice practicable under the circumstances and satisfies all legal requirements, including Federal Rule of Civil Procedure 23(c)(2)(B) and the Due Process Clause.

20. Honorable Jesse M. Furman

Brach Family Found. v. AXA Equitable Life Ins. Co., (June 22, 2023) No. 16-cv-00740 (JMF) (S.D.N.Y.):

The Court appoints JND Legal Administration LLC ("JND") a competent firm, as the Settlement Administrator…Pursuant to Rule 23(e)(1)(B), the Court directs that notice be provided to Class Members through the Notices, attached as Exhibits B-D to the Declaration of Gina M. Intrepido-Bowden (the "Intrepido-Bowden Declaration"), and

through the notice program described in Section 5 of the Agreement and Paragraphs 18-23 and 34-40 of the Intrepido-Bowden Declaration. The Court finds that the manner of distribution of the Notices constitutes the best practicable notice under the circumstances as well as valid, due and sufficient notice to the Classes and complies fully with the requirements of Federal Rule of Civil Procedure 23 and the due process requirements of the United States Constitution.

21. Honorable David O Carter

Gutierrez, Jr. v. Amplify Energy Corp., (June 16, 2023)

No. 21-cv-01628-DOC-JDE (C.D. Cal.):

The Court appoints JND Legal Administration as the Settlement Administrator in this Action…The Court approves, as to form and content, the Direct Notices, Long Form Notices, and Email notices substantially in the forms attached as Exhibits B-J to the Declaration of Gina Intrepido-Bowden Regarding Proposed Shipping Defendants Settlement Notice Plan ("Intrepido-Bowden Declaration").

22. Honorable Virginia M. Kendall

In re Local TV Advert. Antitrust Litig., (June 14, 2023)

MDL No. 2867 (N.D. Ill.):

JND Legal Administration is hereby appointed as the Settlement Administrator with respect to the CBS, Fox, Cox Entities, and ShareBuilders Settlements. The Court approves the proposed Notice Program, including the, Email Notice, Postcard Notice, Print Notice, Digital Notice, Long Form Notice and the Claim Form, attached to the Declaration of Gina M. Intrepido-Bowden as Exhibits B to G.

23. Honorable Daniel D. Domenico

Advance Trust & Life Escrow Serv., LTA v. Sec. Life of Denver Ins. Co., (April 18, 2023)

No. 18-cv-01897-DDD-NYW (D. Colo.):

The Court appoints JND Legal Administration LLC ("JND") a competent firm, as the Settlement Administrator…Pursuant to Rule 23(e)(1)(B), the Court directs that notice be provided to class members through the Notices, attached as Exhibits B-C to the Declaration of Gina M. Intrepido-Bowden (the "Intrepido-Bowden Declaration"), and through the notice program described in Section 4 of the Agreement and Paragraphs 32-38 of the Intrepido-Bowden Declaration. The Court finds that the manner of distribution of the Notices constitutes the best practicable notice under the circumstances as well as valid, due and sufficient notice to the Class and complies fully with the requirements of Federal Rule of Civil Procedure 23 and the due process requirements of the United States Constitution.

24. Honorable Dana M. Sabraw

***In re Packaged Seafood Prods. Antitrust Litig.* (EPP Class),** (July 15, 2022)

No. 15-md-02670 (S.D. Cal.):

An experienced and well-respected claims administrator, JND Legal Administration LLC ("JND"), administered a comprehensive and robust notice plan to alert Settlement Class Members of the COSI Settlement Agreement…The Notice Plan surpassed the 85% reach goal…The Court recognizes JND's extensive experience in processing claims especially for millions of claimants…The Court finds due process was satisfied and the Notice Program provided adequate notice to settlement class members in a reasonable manner through all major and common forms of media.

25. Judge Fernando M. Olguin

***Gupta v. Aeries Software, Inc.*,** (July 7, 2022)

No. 20-cv-00995 (C.D. Cal.):

Under the circumstances, the court finds that the procedure for providing notice and the content of the class notice constitute the best practicable notice to class members and complies with the requirements of due process…The court appoints JND as settlement administrator.

26. Judge Cormac J. Carney

***Gifford v. Pets Global, Inc.*,** (June 24, 2022)

No. 21-cv-02136-CJC-MRW (C.D. Cal.):

The Settlement also proposes that JND Legal Administration act as Settlement Administrator and offers a provisional plan for Class Notice… The proposed notice plan here is designed to reach at least 70% of the class at least two times. The Notices proposed in this matter inform Class Members of the salient terms of the Settlement, the Class to be certified, the final approval hearing and the rights of all parties, including the rights to file objections or to opt-out of the Settlement Class… This proposed notice program provides a fair opportunity for Class Members to obtain full disclosure of the conditions of the Settlement and to make an informed decision regarding the Settlement.

27. Judge David J. Novak

***Brighton Tr. LLC, as Tr. v. Genworth Life & Annuity Ins. Co.*,** (June 3, 2022)

No. 20-cv-240-DJN (E.D. Va.):

The Court appoints JND Legal Administration LLC ("JND"), a competent firm, as the Settlement Administrator…The Court approves the Notice Plan, as set forth in…paragraphs 9-15 and Exhibits B-C of the May 9, 2022 Declaration of Gina Intrepido-Bowden ("Intrepido-Bowden Declaration").

28. Judge Cecilia M. Altonaga

***In re Farm-raised Salmon and Salmon Prod. Antitrust Litig.*,** (May 26, 2022)
No. 19-cv-21551-CMA (S.D. Fla.):

The Court approves the form and content of: (a) the Long Form Notice, attached as Exhibit B to the Declaration of Gina Intrepido-Bowden of JND Administration; and (b) the Informational Press Release (the "Press Release"), attached as Exhibit C to that Declaration. The Court finds that the mailing of the Notice and the Press Release in the manner set forth herein constitutes the best notice that is practicable under the circumstances, is valid, due, and sufficient notice to all persons entitled thereto and complies fully with the requirements of Federal Rule of Civil Procedure 23 and the due process requirements of the Constitution of the United States.

29. Judge William M. Conley

***Bruzek v. Husky Oil Operations Ltd.*,** (January 31, 2022)
No. 18-cv-00697 (W.D. Wis.):

The claims administrator estimates that at least 70% of the class received notice… the court concludes that the parties' settlement is fair, reasonable and adequate under Rule 23(e).

30. Honorable Dana M. Sabraw

In re Packaged Seafood Prods. Antitrust Litig. (DPP Class), (January 26, 2022)
No. 15-md-02670 (S.D. Cal.):

The rigorous notice plan proposed by JND satisfies requirements imposed by Rule 23 and the Due Process clause of the United States Constitution. Moreover, the content of the notice satisfactorily informs Settlement Class members of their rights under the Settlement.

31. Honorable Dana M. Sabraw

In re Packaged Seafood Prods. Antitrust Litig. (EPP Class), (January 26, 2022)
No. 15-md-02670 (S.D. Cal.):

Class Counsel retained JND, an experienced notice and claims administrator, to serve as the notice provider and settlement claims administrator. The Court approves and appoints JND as the Claims Administrator. EPPs and JND have developed an extensive and robust notice program which satisfies prevailing reach standards. JND also developed a distribution plan which includes an efficient and user-friendly claims process with an effective distribution program. The Notice is estimated to reach over 85% of potential class members via notice placements with the leading digital network (Google Display Network), the top social media site (Facebook), and a highly read consumer magazine (People)… The Court approves the notice content and plan for providing notice of the COSI Settlement to members of the Settlement Class.

32. Judge Alvin K. Hellerstein

Leonard v. John Hancock Life Ins. Co. of NY, (January 10, 2022)

No. 18-CV-04994 (S.D.N.Y.):

The Court appoints Gina Intrepido-Bowden of JND Legal Administration LLC, a competent firm, as the Settlement Administrator…the Court directs that notice be provided to class members through the Notices, attached as Exhibits B-C to the Declaration of Gina M. Intrepido-Bowden (the "Intrepido-Bowden Declaration"), and through the notice program described in described in Section 5 of the Agreement and Paragraphs 24-33 of the Intrepido-Bowden Declaration. The Court finds that the manner of distribution of the Notices constitutes the best practicable notice under the circumstances as well as valid, due and sufficient notice to the Class and complies fully with the requirements of Federal Rule of Civil Procedure 23 and the due process requirements of the United States Constitution.

33. Honorable Nelson S. Roman

Swetz v. GSK Consumer Health, Inc., (November 22, 2021)

No. 20-cv-04731 (S.D.N.Y.):

The Notice Plan provided for notice through a nationwide press release; direct notice through electronic mail, or in the alternative, mailed, first-class postage prepaid for identified Settlement Class Members; notice through electronic media—such as Google Display Network and Facebook—using a digital advertising campaign with links to the dedicated Settlement Website; and a toll-free telephone number that provides Settlement Class Members detailed information and directs them to the Settlement Website. The record shows, and the Court finds, that the Notice Plan has been implemented in the manner approved by the Court in its Preliminary Approval Order.

34. Honorable Nathanael M. Cousins

Malone v. Western Digital Corp., (July 21, 2021)

No. 20-cv-03584-NC (N.D. Cal.):

The Court hereby appoints JND Legal Administration as Settlement Administrator… The Court finds that the proposed notice program meets the requirements of Due Process under the U.S. Constitution and Rule 23; and that such notice program-which includes individual direct notice to known Settlement Class Members via email, mail, and a second reminder email, a media and Internet notice program, and the establishment of a Settlement Website and Toll-Free Number-is the best notice practicable under the circumstances and shall constitute due and sufficient notice to all persons entitled thereto.

35. Judge Vernon S. Broderick, Jr.

In re Keurig Green Mountain Single-Serve Coffee Antitrust Litig., (June 7, 2021) No. 14-md-02542 (S.D.N.Y.):

The Notice Plan provided for notice through a nationwide press release, print notice in the national edition of People magazine, and electronic media—Google Display Network, Facebook, and LinkedIn—using a digital advertising campaign with links to a settlement website. Proof that Plaintiffs have complied with the Notice Plan has been filed with the Court. The Notice Plan met the requirements of due process and Federal Rule of Civil Procedure 23; constituted the most effective and best notice of the Agreement and fairness hearing practicable under the circumstances; and constituted due and sufficient notice for all other purposes to all other persons and entities entitled to receive notice.

36. Judge R. David Proctor

In re Blue Cross Blue Shield Antitrust Litig., (November 30, 2020) Master File No. 13-CV-20000-RDP (N.D. Ala.):

After a competitive bidding process, Settlement Class Counsel retained JND Legal Administration LLC ("JND") to serve as Notice and Claims Administrator for the settlement. JND has a proven track record and extensive experience in large, complex matters… JND has prepared a customized Notice Plan in this case. The Notice Plan was designed to provide the best notice practicable, consistent with the latest methods and tools employed in the industry and approved by other courts…The court finds that the proposed Notice Plan is appropriate in both form and content and is due to be approved.

37. Honorable Louis L. Stanton

Rick Nelson Co. v. Sony Music Ent., (September 16, 2020) No. 18-cv-08791 (S.D.N.Y.):

The parties have designated JND Legal Administration ("JND") as the Settlement Administrator. Having found it qualified, the Court appoints JND as the Settlement Administrator and it shall perform all the duties of the Settlement Administrator as set forth in the Stipulation…The form and content of the Notice, Publication Notice and Email Notice, and the method set forth herein of notifying the Class of the Settlement and its terms and conditions, meet the requirements of Rule 23 of the Federal Rules of Civil Procedure, due process. and any other applicable law, constitute the best notice practicable under the circumstances, and shall constitute due and sufficient notice to all persons and entities entitled thereto.

38. Judge Kathleen M. Daily

***Podawiltz v. Swisher Int'l, Inc.*, (February 7, 2019)**

No. 16CV27621 (Or. Cir. Ct.):

The Court appoints JND Legal Administration as settlement administrator…The Court finds that the notice plan is reasonable, that it constitutes due, adequate and sufficient notice to all persons entitled to receive notice, and that it meets the requirements of due process, ORCP 32, and any other applicable laws.

39. Judge John Bailey

***In re Monitronics Int'l, Inc. TCPA Litig.*, (September 28, 2017)**

No. 11-cv-00090 (N.D. W.Va.):

The Court carefully considered the Notice Plan set forth in the Settlement Agreement and plaintiffs' motion for preliminary approval. The Court finds that the Notice Plan constitutes the best notice practicable under the circumstances, and satisfies fully the requirements of Rule 23, the requirements of due process and any other applicable law, such that the terms of the Settlement Agreement, the releases provided therein, and this Court's final judgment will be binding on all Settlement Class Members.

40. Honorable James Ashford

***Nishimura v. Gentry Homes, LTD.*, (September 14, 2017)**

No. 11-11-1-1522-07-RAN (Haw. Super. Ct.):

The Court further finds that the mailing and distribution of the Class Notice and the publication of the Class Notices substantially in the manner and form set forth in the Notice Plan and Settlement Agreement meets the requirements of the laws of the State of Hawai'i (including Hawai'i Rule of Civil Procedure 23), the United States Constitution (including the Due Process Clause), the Rules of the Court, and any other applicable law, constitutes the best notice practicable under the circumstances, and constitutes due and sufficient notice to all potential Class Members.

41. Judge Cecilia M. Altonaga

***Flaum v. Doctor's Assoc., Inc.*, (March 22, 2017)**

No. 16-cv-61198 (S.D. Fla.):

The Court approves the notice program in all respects (including the proposed forms of notice, Summary Notice, Full Notice for the Settlement Website, Publication Notice, Press Release and Settlement Claim Forms, and orders that notice be given in substantial conformity therewith.

42. Judge Joan A. Leonard

Barba v. Shire U.S., Inc., (December 2, 2016)

No. 13-cv-21158 (S.D. Fla.):

... the Court finds that the Notice was given to potential Settlement Class members who were identified through reasonable efforts, published using several publication dates in Better Homes and Gardens, National Geographic, and People magazines; placed on targeted website and portal banner advertisements on general Run of Network sites; included in e-newsletter placements with ADDitude, a magazine dedicated to helping children and adults with attention deficit disorder and learning disabilities lead successful lives, and posted on the Settlement Website which included additional access to Settlement information and a toll-free number. Pursuant to, and in accordance with, Federal Rule of Civil Procedure 23, the Court hereby finds that the Notice provided Settlement Class members with due and adequate notice of the Settlement, the Settlement Agreement, these proceedings, and the rights of Settlement Class members to make a claim, object to the Settlement or exclude themselves from the Settlement.

43. Judge Marco A. Hernandez

Kearney v. Equilon Enter. LLC, (October 25, 2016)

No. 14-cv-00254 (D. Ore.):

The papers supporting the Final Approval Motion, including, but not limited to, the Declaration of Robert A. Curtis and the two Declarations filed by Gina Intrepido-Bowden, describe the Parties' provision of Notice of the Settlement. Notice was directed to all members of the Settlement Classes defined in paragraph 2, above. No objections to the method or contents of the Notice have been received. Based on the above-mentioned declarations, inter alia, the Court finds that the Parties have fully and adequately effectuated the Notice Plan, as required by the Preliminary Approval Order, and, in fact, have achieved better results than anticipated or required by the Preliminary Approval Order.

44. Judge Fernando M. Olguin

Chambers v. Whirlpool Corp., (October 11, 2016)

No. 11-cv-01733 (C.D. Cal.):

Accordingly, based on its prior findings and the record before it, the court finds that the Class Notice and the notice process fairly and adequately informed the class members of the nature of the action, the terms of the proposed settlement, the effect of the action and release of claims, their right to exclude themselves from the action, and their right to object to the proposed settlement.

45. Judge Mary M. Rowland

In re Home Depot, Inc., Customer Data Sec. Breach Litig., (August 23, 2016) No. 14-md-02583 (N.D. Ga.):

The Court finds that the Notice Program has been implemented by the Settlement Administrator and the parties in accordance with the requirements of the Settlement Agreement, and that such Notice Program, including the utilized forms of Notice, constitutes the best notice practicable under the circumstances and satisfies due process and the requirements of Rule 23 of the Federal Rules of Civil Procedure.

46. Honorable Lynn Adelman

Fond Du Lac Bumper Exch., Inc. v. Jui Li Enter. Co., Ltd., (Indirect Purchaser), (July 7, 2016) No. 09-cv-00852 (E.D. Wis.):

The Court further finds that the mailing and publication of Notice in the manner set forth in the Notice Program is the best notice practicable under the circumstances; is valid, due and sufficient notice to all Settlement Class members; and complies fully with the requirements of Federal Rule of Civil Procedure 23 and the due process requirements of the Constitution of the United States. The Court further finds that the forms of Notice are written in plain language, use simple terminology, and are designed to be readily understandable by Settlement Class members.

47. Judge Marco A. Hernandez

Kearney v. Equilon Enter. LLC, (June 6, 2016) No. 14-cv-00254 (Ore. Dist. Ct.):

The Court finds that the Parties' plan for providing Notice to the Settlement Classes as described in paragraphs 35-42 of the Settlement Agreement and as detailed in the Settlement Notice Plan attached to the Declaration of Gina Intrepido-Bowden: (a) constitutes the best notice practicable under the circumstances of this Action; (b) constitutes due and sufficient notice to the Settlement Classes of the pendency of the Action, certification of the Settlement Classes, the terms of the Settlement Agreement, and the Final Approval Hearing; and (c) complies fully with the requirements of the Federal Rules of Civil Procedure, the United States Constitution, and any other applicable law. The Court further finds that the Parties' plan for providing Notice to the Settlement Classes, as described in paragraphs 35-42 of the Settlement Agreement and as detailed in the Settlement Notice Plan attached to the Declaration of Gina Intrepido-Bowden, will adequately inform members of the Settlement Classes of their right to exclude themselves from the Settlement Classes so as not to be bound by the Settlement Agreement.

48. Judge Joan A. Leonard

Barba v. Shire U.S., Inc., (April 11, 2016)

No. 13-cv-21158 (S.D. Fla.):

The Court finds that the proposed methods for giving notice of the Settlement to members of the Settlement Class, as set forth in this Order and in the Settlement Agreement, meet the requirements of Federal Rule of Civil Procedure Rule 23 and requirements of state and federal due process, is the best notice practicable under the circumstances, and shall constitute due and sufficient notice to all persons entitled thereto.

49. Honorable Mitchell D. Dembin

Lerma v. Schiff Nutrition Int'l, Inc., (November 3, 2015)

No. 11-CV-01056 (S.D. Cal.):

According to Ms. Intrepido-Bowden, between June 29, 2015, and August 2, 2015, consumer publications are estimated to have reached 53.9% of likely Class Members and internet publications are estimated to have reached 58.9% of likely Class Members…The Court finds this notice (i) constituted the best notice practicable under the circumstances, (ii) constituted notice that was reasonably calculated, under the circumstances, to apprise the putative Class Members of the pendency of the action, and of their right to object and to appear at the Final Approval Hearing or to exclude themselves from the Settlement, (iii) was reasonable and constituted due, adequate, and sufficient notice to all persons entitled to be provided with notice, and (iv) fully complied with due process principles and Federal Rule of Civil Procedure 23.

50. Honorable Sara I. Ellis

Thomas v. Lennox Indus. Inc., (July 9, 2015)

No. 13-CV-07747 (N.D. Ill.):

The Court approves the form and content of the Long-Form Notice, Summary Notice, Postcard Notice, Dealer Notice, and Internet Banners (the "Notices") attached as Exhibits A-1, A-2, A-3, A-4 and A-5 respectively to the Settlement Agreement. The Court finds that the Notice Plan, included in the Settlement Agreement and the Declaration of Gina M. Intrepido-Bowden on Settlement Notice Plan and Notice Documents, constitutes the best practicable notice under the circumstances as well as valid, due and sufficient notice to all persons entitled thereto, and that the Notice Plan complies fully with the requirements of Federal Rule of Civil Procedure 23 and provides Settlement Class Members due process under the United States Constitution.

51. Honorable David O. Carter

Cobb v. BSH Home Appliances Corp., (December 29, 2014)

No. 10-CV-0711 (C.D. Cal.):

The Notice Program complies with Rule 23(c)(2)(B) because it constitutes the best notice practicable under the circumstances, provides individual notice to all Class Members who can be identified through reasonable effort, and is reasonably calculated under the circumstances to apprise the Class Members of the nature of the action, the claims it asserts, the Class definition, the Settlement terms, the right to appear through an attorney, the right to opt out of the Class or to comment on or object to the Settlement (and how to do so), and the binding effect of a final judgment upon Class Members who do not opt out.

52. Honorable José L. Linares

Demmick v. Cellco P'ship, (November 19, 2014)

No. 06-CV-2163 (D.N.J.):

The Court finds that the Parties' plan for providing Notice to the Settlement Classes as described in Article V of the Settlement Agreement and as detailed in the Settlement Notice Plan attached to the Declaration of Gina M. Intrepido-Bowden: (a) constitutes the best notice practicable under the circumstances of this Action; (b) constitutes due and sufficient notice to the Settlement Classes of the pendency of the Action, certification of the Settlement Classes, the terms of the Settlement Agreement, and the Final Approval Hearing; and (c) complies fully with the requirements of the Federal Rules of Civil Procedure, the United States Constitution, and any other applicable law.

The Court further finds that the Parties' plan for providing Notice to the Settlement Classes as described in Article V of the Settlement Agreement and as detailed in the Settlement Notice Plan attached to the Declaration of Gina M. Intrepido-Bowden, will adequately inform members of the Settlement Classes of their right to exclude themselves from the Settlement Classes so as to not be bound by the Settlement Agreement.

53. Judge Gregory A. Presnell

Poertner v. Gillette Co., (November 5, 2013)

No. 12-CV-00803 (M.D. Fla.):

The Court finds that compliance with the Notice Plan is the best practicable notice under the circumstances and constitutes due and sufficient notice of this Order to all persons entitled thereto and is in full compliance with the requirements of Rule 23, applicable law, and due process.

54. Judge Marilyn L. Huff

Beck-Ellman v. Kaz USA, Inc., (June 11, 2013)

No. 10-cv-02134 (S.D. Cal.):

The Notice Plan has now been implemented in accordance with the Court's Preliminary Approval Order…The Notice Plan was specially developed to cause class members to see the Publication Notice or see an advertisement that directed them to the Settlement Website…The Court concludes that the Class Notice fully satisfied the requirements of Rule 23(c)(2) of the Federal Rules of Civil Procedure and all due process requirements.

55. Judge Tom A. Lucas

Stroud v. eMachines, Inc., (March 27, 2013)

No. CJ-2003-968 L (W.D. Okla.):

The Notices met the requirements of Okla. Stat. tit. 12 section 2023(C), due process, and any other applicable law; constituted the best notice practicable under the circumstances; and constituted due and sufficient notice to all persons and entities entitled thereto. All objections are stricken. Alternatively, considered on their merits, all objections are overruled.

56. Honorable Michael M. Anello

Shames v. Hertz Corp., (November 5, 2012)

No. 07-cv-02174 (S.D. Cal.):

…the Court is satisfied that the parties and the class administrator made reasonable efforts to reach class members. Class members who did not receive individualized notice still had opportunity for notice by publication, email, or both…The Court is satisfied that the redundancies in the parties' class notice procedure—mailing, e-mailing, and publication—reasonably ensured the widest possible dissemination of the notice…The Court OVERRULES all objections to the class settlement…

57. Judge Ann D. Montgomery

In re Uponor, Inc., F1807 Plumbing Fittings Prod. Liab. Litig., (July 9, 2012)

No. 11-MD-2247 (D. Minn.):

The objections filed by class members are overruled; The notice provided to the class was reasonably calculated under the circumstances to apprise class members of the pendency of this action, the terms of the Settlement Agreement, and their right to object, opt out, and appear at the final fairness hearing.

58. Judge Ann D. Montgomery

In re Uponor, Inc., F1807 Plumbing Fittings Prod. Liab. Litig., (January 18, 2012) No. 11-MD-2247 (D. Minn.):

The Notice Plan detailed in the Affidavit of Gina M. Intrepido-Bowden provides the best notice practicable under the circumstances and constitutes due and sufficient notice of the Settlement Agreement and the Final Fairness Hearing to the Classes and all persons entitled to receive such notice as potential members of the Class…The Notice Plan's multi-faceted approach to providing notice to Class Members whose identity is not known to the Settling Parties constitutes 'the best notice that is practicable under the circumstances' consistent with Rule 23(c)(2)(B)…Notice to Class members must clearly and concisely state the nature of the lawsuit and its claims and defenses, the Class certified, the Class member's right to appear through an attorney or opt out of the Class, the time and manner for opting out, and the binding effect of a class judgment on members of the Class. Fed. R. Civ. P. 23(c)(2)(B). Compliance with Rule 23's notice requirements also complies with Due Process requirements. 'The combination of reasonable notice, the opportunity to be heard, and the opportunity to withdraw from the class satisfy due process requirements of the Fifth Amendment.' Prudential, 148 F.3d at 306. The proposed notices in the present case meet those requirements.

59. Judge Jeremy Fogel

Ko v. Natura Pet Prod., Inc., (June 24, 2011) No. 09cv2619 (N.D. Cal.):

The Court approves, as to form and content, the Long Form Notice of Pendency and Settlement of Class Action ("Long Form Notice"), and the Summary Notice attached as Exhibits to the Settlement Agreement, and finds that the e-mailing of the Summary Notice, and posting on the dedicated internet website of the Long Form Notice, mailing of the Summary Notice post-card, and newspaper and magazine publication of the Summary Notice substantially in the manner as set forth in this Order meets the requirements of Rule 23 of the Federal Rules of Civil Procedure, and due process, and is the best notice practicable under the circumstances and shall constitute due and sufficient notice to all persons entitled to notice.

60. Judge M. Joseph Tiemann

Billieson v. City of New Orleans, (May 27, 2011) No. 94-19231 (La. Civ. Dist. Ct.):

The plan to disseminate notice for the Insurance Settlements (the "Insurance Settlements Notice Plan") which was designed at the request of Class Counsel by experienced Notice Professionals Gina Intrepido-Bowden… IT IS ORDERED as follows: 1. The Insurance Settlements Notice Plan is hereby approved and shall be executed by the Notice Administrator; 2. The Insurance Settlements Notice Documents, substantially in the form included in the Insurance Settlements Notice Plan, are hereby approved.

61. Judge Robert W. Gettleman

***In re Trans Union Corp.*,** (September 17, 2008)

MDL No. 1350 (N.D. Ill.):

The Court finds that the dissemination of the Class Notice under the terms and in the format provided for in its Preliminary Approval Order constitutes the best notice practicable under the circumstances, is due and sufficient notice for all purposes to all persons entitled to such notice, and fully satisfies the requirements of the Federal Rules of Civil Procedure, the requirements of due process under the Constitution of the United States, and any other applicable law…Accordingly, all objections are hereby OVERRULED.

62. Judge William G. Young

***In re TJX Cos. Retail Security Breach Litig.*,** (September 2, 2008)

MDL No. 1838 (D. Mass.):

…as attested in the Affidavit of Gina M. Intrepido…The form, content, and method of dissemination of notice provided to the Settlement Class were adequate and reasonable, and constituted the best notice practicable under the circumstances. The Notice, as given, provided valid, due, and sufficient notice of the proposed settlement, the terms and conditions set forth in the Settlement Agreement, and these proceedings to all Persons entitled to such notice, and said Notice fully satisfied the requirements of Fed. R. Civ. P. 23 and due process.

63. Judge David De Alba

***Ford Explorer Cases*,** (May 29, 2008)

JCCP Nos. 4226 & 4270 (Cal. Super. Ct.):

[T]he Court is satisfied that the notice plan, design, implementation, costs, reach, were all reasonable, and has no reservations about the notice to those in this state and those in other states as well, including Texas, Connecticut, and Illinois; that the plan that was approved -- submitted and approved, comports with the fundamentals of due process as described in the case law that was offered by counsel.

III. SPEAKING ENGAGEMENTS

1. ***AI Issues Raised in the Settlement Claims Fraud Context***, NEW JERSEY STATE BAR ASSOCIATION (NJSBA) Annual Meeting, presenter (May 2026).

2. ***'Marching to Their Own Drumbeat.' What Lawyers Don't Understand About Notice and Claims Administration***, AMERICAN BAR ASSOCIATION, (ABA) 23rd Annual National Institute on Class Actions, panelist (October 2019).

3. ***Rule 23 Amendments and Digital Notice Ethics, accredited CLE Program***, presenter at Terrell Marshall Law Group PLLC, Seattle, WA (June 2019); Severson & Werson, San Francisco, CA and broadcast to office in Irvine (June 2019); Greenberg Traurig, LLP, Los Angeles, CA (May 2019); Chicago Bar Association, Chicago, IL (January 2019); Sidley Austin LLP, Century City, CA and broadcast to offices in Los Angeles, San Francisco, New York, Chicago, Washington D.C. (January 2019); Burns Charest LLP, Dallas, TX (November 2018); Lockridge Grindal Nauen P.L.L.P., Minneapolis, MN (October 2018); Zimmerman Reed LLP, Minneapolis, MN (October 2018); Gustafson Gluek PLLC, Minneapolis, MN (October 2018).

4. ***Ethics in Legal Notification*, accredited CLE Program**, presenter at Kessler Topaz Meltzer & Check LLP, Radnor, PA (September 2015); The St. Regis Resort, Deer Valley, UT (March 2014); and Morgan Lewis & Bockius, New York, NY (December 2012).

5. ***Pitfalls of Class Action Notice and Settlement Administration*, accredited CLE Program**, PRACTISING LAW INSTITUTE (PLI), Class Action Litigation 2013, presenter/panelist (July 2013).

6. ***The Fundamentals of Settlement Administration*, accredited CLE Program**, presenter at Skadden, Arps, Slate, Meagher & Flom LLP, Chicago, IL (January 2013); Wexler Wallace LLP, Chicago, IL (January 2013); Hinshaw & Culbertson LLP, Chicago, IL (October 2012); and Spector Roseman Kodroff & Willis, P.C., Philadelphia, PA (December 2011).

7. ***Class Action Settlement Administration Tips & Pitfalls on the Path to Approval*, accredited CLE Program**, presenter at Jenner & Block, Chicago, IL and broadcast to offices in Washington DC, New York and California (October 2012).

8. ***Reaching Class Members & Driving Take Rates***, CONSUMER ATTORNEYS OF SAN DIEGO, 4th Annual Class Action Symposium, presenter/panelist (October 2011).

9. ***Legal Notice Ethics, accredited CLE Program***, presenter at Heins Mills & Olson, P.L.C., Minneapolis, MN (January 2011); Lockridge Grindal Nauen P.L.L.P., Minneapolis, MN (January 2011); Chestnut Cambronne, Minneapolis, MN (January 2011); Berger & Montague, P.C., Anapol Schwartz, Philadelphia, PA (October 2010); Lundy Law, Philadelphia, PA (October 2010); Dechert LLP, Philadelphia, PA and broadcast to offices in California, New Jersey, New York, North Carolina, Texas, Washington D.C., and London and sent via video to their office in China (October 2010); Miller Law LLC, Chicago, IL (May 2010); Cohen Milstein Sellers & Toll PLLC, New York, NY (May 2010); and Milberg LLP, New York, NY (May 2010).

10. ***Class Actions 101: Best Practices and Potential Pitfalls in Providing Class Notice, accredited CLE Program***, presenter, Kansas Bar Association (March 2009).

IV. ARTICLES

1. Jennifer Keough and Gina M. Intrepido-Bowden, *Simulated Engagement: Using AI-Generated Audiences to Strengthen Legal Notice Strategy*, law.com (2025).

2. Gina M. Intrepido-Bowden, *Time to Allow More Streamlined Class Action Notice Formats – Adapting Short Form Notice Requirements to Accommodate Today's Fast Paced Society*, LAW360 (2021).

3. Todd B. Hilsee, Gina M. Intrepido & Shannon R. Wheatman, *Hurricanes, Mobility and* Due *Process: The "Desire-to-Inform" Requirement for Effective Class Action Notice Is Highlighted by Katrina*, 80 TULANE LAW REV. 1771 (2006); reprinted in course materials for: CENTER FOR LEGAL EDUCATION INTERNATIONAL, Class Actions: Prosecuting and Defending Complex Litigation (2007); AMERICAN BAR ASSOCIATION, 10th Annual National Institute on Class Actions (2006); NATIONAL BUSINESS INSTITUTE, Class Action Update: Today's Trends & Strategies for Success (2006).

4. Gina M. Intrepido, *Notice Experts May Help Resolve CAFA Removal Issues, Notification to Officials*, 6 CLASS ACTION LITIG. REP. 759 (2005).

5. Todd B. Hilsee, Shannon R. Wheatman, & Gina M. Intrepido, *Do You Really Want Me to Know My Rights? The Ethics Behind Due Process in Class Action Notice Is More Than Just Plain Language: A Desire to Actually Inform*, 18 GEORGETOWN JOURNAL LEGAL ETHICS 1359 (2005).

V. CASE EXPERIENCE

Ms. Intrepido-Bowden has been involved in the design and implementation of hundreds of notice programs throughout her career. A partial listing of her case work is provided below.

CASE NAME	CASE NUMBER	LOCATION
A.B. v. Regents of the Univ. of California	20-cv-09555-RGK-E	C.D. Cal.
Abante Rooter & Plumbing, Inc. v. New York Life Ins. Co.	16-cv-03588	S.D.N.Y.
Aberin v. Am. Honda Motor Co., Inc.	16-cv-04384-JST	N.D. Cal.
Advance Trust & Life Escrow Serv., LTA v. PHL Variable Ins. Co.	18-cv-03444 (MKV)	S.D.N.Y.
Advance Trust & Life Escrow Serv., LTA v. Sec. Life of Denver Ins. Co.	18-cv-01897-DDD-NYW	D. Colo.
Ahmed v. HSBC Bank USA, NA	15-cv-2057-FMO-SPx	N.D. Ill.
Allen v. UMB Bank, N.A.	1016-CV34791	Mo. Cir. Ct.
Anderson v. Canada (Phase I)	2008NLTD166	NL Sup. Ct.
Anderson v. Canada (Phase II)	2007 01T4955CP	NL Sup. Ct.
Andrews v. Plains All Am. Pipeline, L.P.	15-cv-04113-PSG-JEM	C.D. Cal.
Angel v. U.S. Tire Recovery	06-C-855	W. Va. Cir. Ct.
Baiz v. Mountain View Cemetery	809869-2	Cal. Super. Ct.
Baker v. Jewel Food Stores, Inc. & Dominick's Finer Foods, Inc.	00-L-9664	Ill. Cir. Ct.
Banks v. R.C. Bigelow, Inc.	20-cv-06208-DDP (RAOx)	C.D. Cal.
Barba v. Shire U.S., Inc.	13-cv-21158	S.D. Fla.
Beck-Ellman v. Kaz USA Inc.	10-cv-2134	S.D. Cal.
Beringer v. Certegy Check Serv., Inc.	07-cv-1657-T-23TGW	M.D. Fla.
Bibb v. Monsanto Co. (Nitro)	041465	W. Va. Cir. Ct.
Billieson v. City of New Orleans	94-19231	La. Civ. Dist. Ct.
Bland v. Premier Nutrition Corp.	RG19-002714	Cal. Super. Ct.
Boskie v. Backgroundchecks.com	2019CP3200824	S.C. C.P.
Brach Family Found. v. AXA Equitable Life Ins. Co.	16-cv-00740 (JMF)	S.D.N.Y.
Brighton Tr. LLC, as Tr. v. Genworth Life & Annuity Ins. Co.	20-cv-240-DJN	E.D. Va.

CASE NAME	CASE NUMBER	LOCATION
Brookshire Bros. v. Chiquita	05-CIV-21962	S.D. Fla.
Brown v. Am. Tobacco	J.C.C.P. 4042 No. 711400	Cal. Super. Ct.
Bruzek v. Husky Oil Operations Ltd.	18-cv-00697	W.D. Wis.
Burnett v. Nat'l Assoc. of Realtors	19-CV-00332-SRB	W.D. Mo.
Campos v. Calumet Transload R.R., LLC	13-cv-08376	N.D. Ill.
Cappalli v. BJ's Wholesale Club, Inc.	10-cv-00407	D.R.I.
Carter v. Monsanto Co. (Nitro)	00-C-300	W. Va. Cir. Ct.
Chambers v. Whirlpool Corp.	11-cv-01733	C.D. Cal.
Chapman v. Gen. Motors, LLC	19-CV-12333-TGB-DRG	E.D. Mich.
City of Philadelphia v. Bank of Am. Corp.	19-CV-1608 (JMF)	S.D.N.Y.
Cobb v. BSH Home Appliances Corp.	10-cv-00711	C.D. Cal.
Cohen v. Subaru Corp.	20-cv-8442-JHR-AMD	D.N.J.
Davis v. Am. Home Prods. Corp.	94-11684	La. Civ. Dist. Ct., Div. K
DC 16 v. Sutter Health	RG15753647	Cal. Super. Ct.
Defrates v. Hollywood Ent. Corp.	02L707	Ill. Cir. Ct.
de Lacour v. Colgate-Palmolive Co.	16-cv-8364-KW	S.D.N.Y.
Demereckis v. BSH Home Appliances Corp.	8:10-cv-00711	C.D. Cal.
Demmick v. Cellco P'ship	06-cv-2163	D.N.J.
Desportes v. Am. Gen. Assurance Co.	SU-04-CV-3637	Ga. Super. Ct.
Doe v. MasterCorp, Inc.	24-cv-678	E.D. Va.
Doe v. MindGeek USA Incorp.	21-cv-00338	C.D. Cal.
Dolen v. ABN AMRO Bank N.V.	01-L-454 & 01-L-493	Ill. Cir. Ct.
Donnelly v. United Tech. Corp.	06-CV-320045CP	Ont. S.C.J.
Duffy v. Mazda Motor of Am., Inc.	24-cv-388-BJB	W.D. Ky.
Eck v. City of Los Angeles	BC577028	Cal. Super. Ct.
Elec. Welfare Trust Fund v. United States	19-353C	Fed. Cl.
Engquist v. City of Los Angeles	BC591331	Cal. Super. Ct.
Ervin v. Movie Gallery Inc.	CV-13007	Tenn. Ch. Fayette Co.
Express Freight Int'l v Hino Motors, LTD.	22-cv-22483	S.D. Fla.
First State Orthopaedics v. Concentra, Inc.	05-CV-04951-AB	E.D. Pa.
Fisher v. Virginia Electric & Power Co.	02-CV-431	E.D. Va.

CASE NAME	CASE NUMBER	LOCATION
Fishon v. Premier Nutrition Corp.	16-CV-06980-RS	N.D. Cal.
Flaum v. Doctor's Assoc., Inc. (d/b/a Subway)	16-cv-61198	S.D. Fla.
Fond du Lac Bumper Exch. Inc. v. Jui Li Enter. Co. Ltd. (Direct & Indirect Purchasers Classes)	09-cv-00852	E.D. Wis.
Ford Explorer Cases	JCCP Nos. 4226 & 4270	Cal. Super. Ct.
Friedman v. Microsoft Corp.	2000-000722	Ariz. Super. Ct.
FTC v. Reckitt Benckiser Grp. PLC	19CV00028	W.D. Va.
Gagnon v. Gen. Motors of Canada Co. and Gen. Motors LLC	500-06-000687-141 and 500-06-000729-158	Quebec Super. Ct.
Gardner v. Stimson Lumber Co.	00-2-17633-3SEA	Wash. Super. Ct.
Gibson v. Nat'l Assoc. of Realtors	23-cv-00788-SRB	W.D. Mo.
Gifford v. Pets Global, Inc.	21-cv-02136-CJC-MRW	C.D. Cal.
Goldstein v. Houlihan/Lawrence Inc.	60767/2018	N.Y. Super. Ct.
Gordon v. Microsoft Corp.	00-5994	D. Minn.
Grays Harbor v. Carrier Corp.	05-05437-RBL	W.D. Wash.
Grey Fox, LLC v. Plains All Am. Pipeline, L.P.	16-cv-03157-PSG-JEM	C.D. Cal.
Griffin v. Dell Canada Inc.	07-CV-325223D2	Ont. Super. Ct.
Gunderson v. F.A. Richard & Assoc., Inc.	2004-2417-D	La. 14th Jud. Dist. Ct.
Gupta v. Aeries Software, Inc.	20-cv-00995	C.D. Cal.
Gutierrez, Jr. v. Amplify Energy Corp.	21-cv-01628-DOC-JDE	C.D. Cal.
Hanks v. Lincoln Life & Annuity Co. of New York	16-cv-6399 PKC	S.D.N.Y.
Herrera v. Wells Fargo Bank, N.A.	18-cv-00332-JVS-MRW	C.D. Cal.
Hill-Green v. Experian Info. Solutions, Inc.	19-cv-708-MHL	E.D. Va.
Huntzinger v. Suunto Oy	37-2018-00027159-CU-BT-CTL	Cal. Super. Ct.
In re Anthem, Inc. Data Breach Litig.	15-md-02617	N.D. Cal.
In re Arizona Theranos, Inc. Litig.	16-cv-2138-DGC	D. Ariz.
In re Babcock & Wilcox Co.	00-10992	E.D. La.
In re Blue Cross Blue Shield Antitrust Litig.	13-CV-20000-RDP	N.D. Ala.
In re Broiler Chicken Antitrust Litig.	16-cv-08637	N.D. Ill.
In re Countrywide Fin. Corp. Customer Data Sec. Breach	MDL 08-md-1998	W.D. Ky.

CASE NAME	CASE NUMBER	LOCATION
In re Farm-raised Salmon and Salmon Prod. Antitrust Litig.	19-cv-21551-CMA	S.D. Fla.
In re Gen. Motors LLC Ignition Switch Litig. (economic settlement)	2543 (MDL)	S.D.N.Y.
In re High Sulfur Content Gasoline Prod. Liab.	MDL No. 1632	E.D. La.
In re Home Depot, Inc., Customer Data Sec. Breach Litig.	14-md-02583	N.D. Ga.
In re Hypodermic Prod. Antitrust Litig.	05-cv-01602	D.N.J.
In re Keurig Green Mountain Single-Serve Coffee Antitrust Litig. (Indirect-Purchasers)	14-md-02542	S.D.N.Y.
In re Lidoderm Antitrust Litig.	14-md-02521	N.D. Cal.
In re Local TV Advert. Antitrust Litig.	MDL No. 2867	N.D. Ill.
In re Lupron Mktg. & Sales Practices	MDL No.1430	D. Mass.
In re Mercedes-Benz Emissions Litig.	16-cv-881 (KM) (ESK)	D.N.J.
In re Monitronics Int'l, Inc., TCPA Litig.	11-cv-00090	N.D. W.Va.
In re Packaged Seafood Prods. Antitrust Litig. (DPP and EPP Class)	15-md-02670	S.D. Cal.
In re Parmalat Sec.	04-md-01653 (LAK)	S.D.N.Y.
In re PVC Pipe Antitrust Litig.	24-cv-07639	N.D. Ill.
In re Residential Schools Litig.	00-CV-192059 CPA	Ont. Super. Ct.
In re Ripple Labs Inc. Litig.	18-cv-06753-PJH	N.D. Cal.
In re Royal Ahold Sec. & "ERISA"	03-md-01539	D. Md.
In re Rust-Oleum Restore Mktg. Sales Practices & Prod. Liab. Litig.	15-cv01364	N.D. Ill.
In re Sears, Roebuck & Co. Front-Loading Washer Prod. Liab. Litig.	06-cv-07023	N.D. Ill.
In re Serzone Prod. Liab.	02-md-1477	S.D. W. Va.
In re Skelaxin (Metaxalone) Antitrust Litig.	12-cv-194	E.D. Ten.
In re Solodyn (Minocycline Hydrochloride) Antitrust Litig. (Direct Purchaser Class)	14-md-2503	D. Mass.
In re Subaru Battery Drain Prods. Liab. Litig.	20-cv-03095-JHR-MJS	D.N.J.
In re TJX Cos. Retail Sec. Breach Litig.	MDL No. 1838	D. Mass.
In re Trans Union Corp. Privacy Litig.	MDL No. 1350	N.D. Ill.

CASE NAME	CASE NUMBER	LOCATION
In re TransUnion Rental Screening Sol. Inc. FCRA Litig.	20-md-02933-JPB	N.D. Ga.
In re Uponor, Inc., F1807 Prod. Liab. Litig.	2247	D. Minn.
In re U.S. Dep't of Veterans Affairs Data Theft Litig.	MDL 1796	D.D.C.
In re Volkswagen "Clean Diesel" Mktg., Sales Practice and Prods. Liab. Litig.	MDL 2672 CRB	N.D. Cal.
In re ZF-TRW Airbag Control Units Prod. Liab. Litig.	19-ml-02905-JAK-JPR (MDL 2905 JAK)	C.D. Cal.
In re Zurn Pex Plumbing Prod. Liab. Litig.	MDL 08-1958	D. Minn.
In the Matter of GTV Media Grp. Inc.	3-20537	SEC
James v. PacifiCorp.	20cv33885	Or. Cir. Ct.
Johnson v. Yahoo! Inc.	14-cv02028	N.D. Ill.
Kearney v. Equilon Enter. LLC	14-cv-00254	D. Ore.
Ko v. Natura Pet Prod., Inc.	09cv02619	N.D. Cal.
Langan v. Johnson & Johnson Consumer Co.	13-cv-01471	D. Conn.
Lavinsky v. City of Los Angeles	BC542245	Cal. Super. Ct.
Lee v. Stonebridge Life Ins. Co.	11-cv-00043	N.D. Cal.
Leonard v. John Hancock Life Ins. Co. of NY	18-CV-04994	S.D.N.Y.
Lerma v. Schiff Nutrition Int'l, Inc.	11-cv-01056	S.D. Cal.
Levy v. Dolgencorp, LLC	20-cv-01037-TJC-MCR	M.D. Fla.
Lockwood v. Certegy Check Serv., Inc.	07-CV-587-FtM-29-DNF	M.D. Fla.
LSIMC, LLC v. Am. Gen. Life Ins. Co.	20-cv-11518	C.D. Cal.
Luster v. Wells Fargo Dealer Serv., Inc.	15-cv-01058	N.D. Ga.
Malone v. Western Digital Corp.	20-cv-03584-NC	N.D. Cal.
Markson v. CRST Int'l, Inc.	17-cv-01261-SB (SPx)	C.D. Cal.
Martinelli v. Johnson & Johnson	15-cv-01733-MCE-DB	E.D. Cal.
McCall v. Hercules Corp.	66810/2021	N.Y. Super. Ct.
McCrary v. Elations Co., LLC	13-cv-00242	C.D. Cal.
Microsoft I-V Cases	J.C.C.P. No. 4106	Cal. Super. Ct.
Moehrl v. Nat'l Assoc. of Realtors	19-cv-01610-ARW	N.D. Ill.
Molina v. Intrust Bank, N.A.	10-cv-3686	Ks. 18th Jud. Dist. Ct.
Moore v Robinhood Fin. LLC	21-cv-01571-BJR	W. D. Wash.

CASE NAME	CASE NUMBER	LOCATION
Morrow v. Conoco Inc.	2002-3860	La. Dist. Ct.
Mullins v. Direct Digital LLC.	13-cv-01829	N.D. Ill.
Myers v. Rite Aid of PA, Inc.	01-2771	Pa. C.P.
Naef v. Masonite Corp.	CV-94-4033	Ala. Cir. Ct.
Natale v. 9199-4467 Quebec Inc., d/b/a Earth Rated	21-cv-6775-JS-SIL	E.D.N.Y.
Nature Guard Cement Roofing Shingles Cases	J.C.C.P. No. 4215	Cal. Super. Ct.
Newton v. R.C. Bigelow Inc.	22-cv-5660	E.D.N.Y.
Nichols v. SmithKline Beecham Corp.	00-6222	E.D. Pa.
Nishimura v. Gentry Homes, LTD.	11-11-1-1522-07-RAN	Haw. Super. Ct.
Novoa v. The GEO Grp., Inc.	17-cv-02514-JGB-SHK	C.D. Cal.
Nwauzor v. GEO Grp., Inc.	17-cv-05769	W.D. Wash.
Oberski v. Gen. Motors LLC and Gen. Motors of Canada Ltd.	CV-14-502023-00CP	Ont. Super. Ct.
Ocana v. Renew Fin. Holdings, Inc.	BC701809	Cal. Super. Ct.
Palace v. DaimlerChrysler	01-CH-13168	Ill. Cir. Ct .
Peek v. Microsoft Corp.	CV-2006-2612	Ark. Cir. Ct.
PHT Holding I LLC v. ReliaStar Life Ins. Co.	18-cv-2863-DWF-ECW	D. Minn.
PHT Holding II LLC v. N. Am. Co. for Life and Health Ins.	18-CV-00368	S.D. Iowa
Plubell v. Merck & Co., Inc.	04CV235817-01	Mo. Cir. Ct.
Podawiltz v. Swisher Int'l, Inc.	16CV27621	Or. Cir. Ct.
Poertner v. Gillette Co.	12-cv-00803	M.D. Fla.
Prather v. Wells Fargo Bank, N.A.	15-cv-04231	N.D. Ga.
Q+ Food, LLC v. Mitsubishi Fuso Truck of Am., Inc.	14-cv-06046	D.N.J.
Richison v. Am. Cemwood Corp.	005532	Cal. Super. Ct.
Rick Nelson Co. v. Sony Music Ent.	18-cv-08791	S.D.N.Y.
Roberts v. Electrolux Home Prod., Inc.	12-cv-01644	C.D. Cal.
Russell v. Kohl's Dep't Stores, Inc.	15-cv-01143	C.D. Cal.
Sandoval v. Merlex Stucco Inc.	BC619322	Cal. Super. Ct.
Scott v. Blockbuster, Inc.	D 162-535	136th Tex. Jud. Dist.
Senne v. Office of the Comm'r of Baseball	14-cv-00608-JCS	N.D. Cal.

CASE NAME	CASE NUMBER	LOCATION
Shames v. Hertz Corp.	07cv2174-MMA	S.D. Cal.
Sidibe v. Sutter Health	12-cv-4854-LB	N.D. Cal.
Silverstein v. Genworth Life Ins. Co.	23-cv-684	E.D. Va.
Staats v. City of Palo Alto	2015-1-CV-284956	Cal. Super. Ct.
Soders v. Gen. Motors Corp.	CI-00-04255	Pa. C.P.
Sonner v. Schwabe North America, Inc.	15-cv-01358 VAP (SPx)	C.D. Cal.
Stroud v. eMachines, Inc.	CJ-2003-968-L	W.D. Okla.
Swetz v. GSK Consumer Health, Inc.	20-cv-04731	S.D.N.Y.
Talalai v. Cooper Tire & Rubber Co.	MID-L-8839-00 MT	N.J. Super. Ct.
Tech. Training Assoc. v. Buccaneers Ltd. P'ship	16-cv-01622	M.D. Fla.
Thibodeaux v. Conoco Philips Co.	2003-481	La. 4th Jud. Dist. Ct.
Thomas v. Lennox Indus. Inc.	13-cv-07747	N.D. Ill.
Thompson v. Metropolitan Life Ins. Co.	00-CIV-5071 HB	S.D.N.Y.
Turner v. Murphy Oil USA, Inc.	05-CV-04206-EEF-JCW	E.D. La.
USC Student Health Ctr. Settlement	18-cv-04258-SVW	C.D. Cal.
Vance v. Mazda Motor of Am., Inc.	01890-CJC-KES	C.D. Cal.
Walker v. Rite Aid of PA, Inc.	99-6210	Pa. C.P.
Weiner v. Ocwen Fin. Corp.	14-cv-02597-DJC-DB	E.D. Cal.
Wells v. Abbott Lab., Inc. (AdvantEdge/ Myoplex nutrition bars)	BC389753	Cal. Super. Ct.
Wener v. United Tech. Corp.	500-06-000425-088	QC. Super. Ct.
West v. G&H Seed Co.	99-C-4984-A	La. 27th Jud. Dist. Ct.
Williams v. Weyerhaeuser Co.	CV-995787	Cal. Super. Ct.
Yamagata v. Reckitt Benckiser, LLC	17-cv-03529-CV	N.D. Cal.
Zarebski v. Hartford Ins. Co. of the Midwest	CV-2006-409-3	Ark. Cir. Ct.

- EXHIBIT B -

Banners Ads 1

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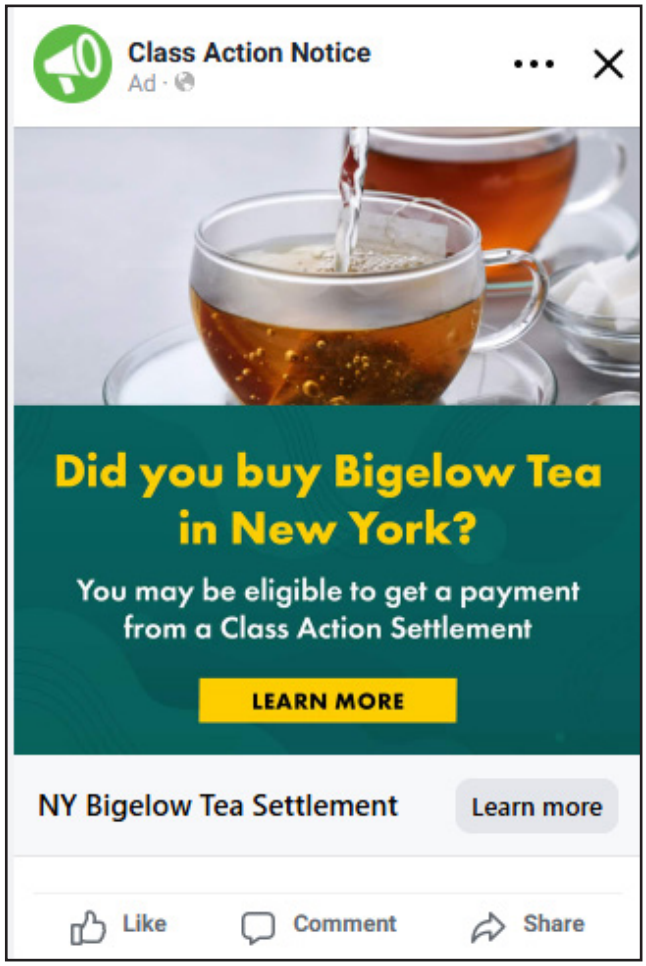
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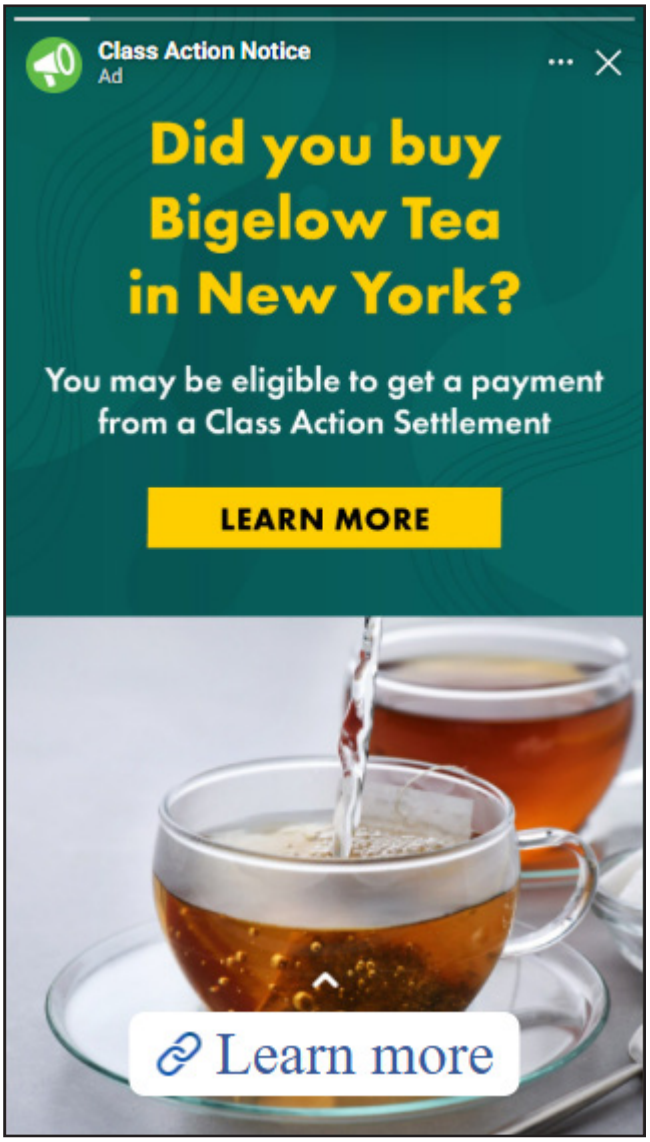
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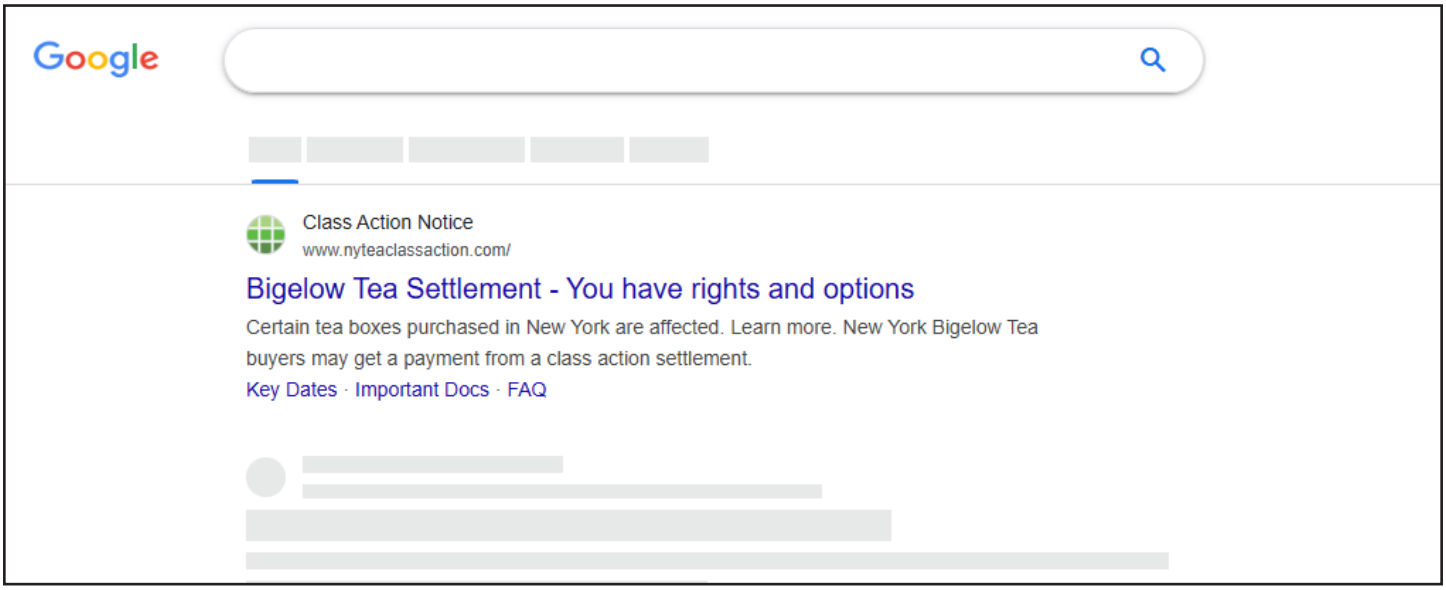
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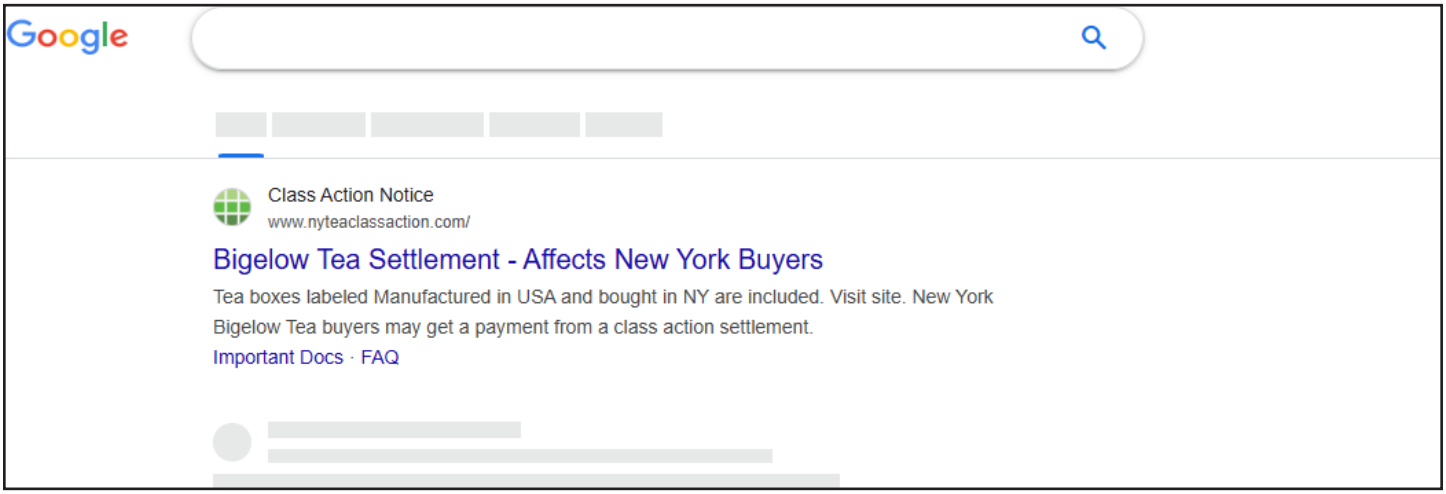


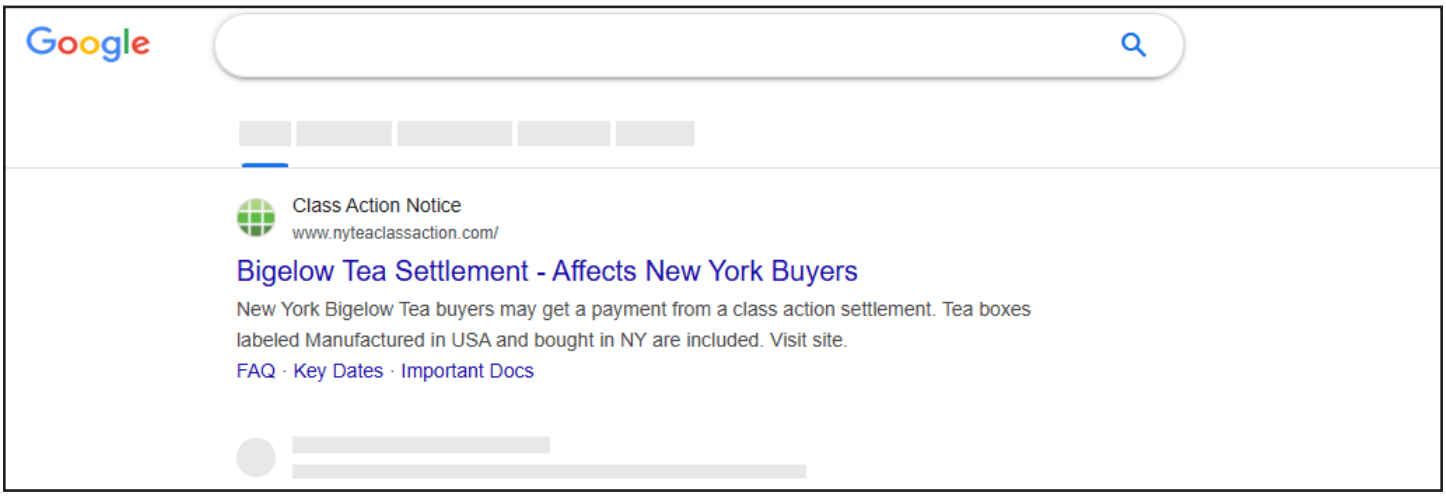
- EXHIBIT C -

Search Response Ads 1

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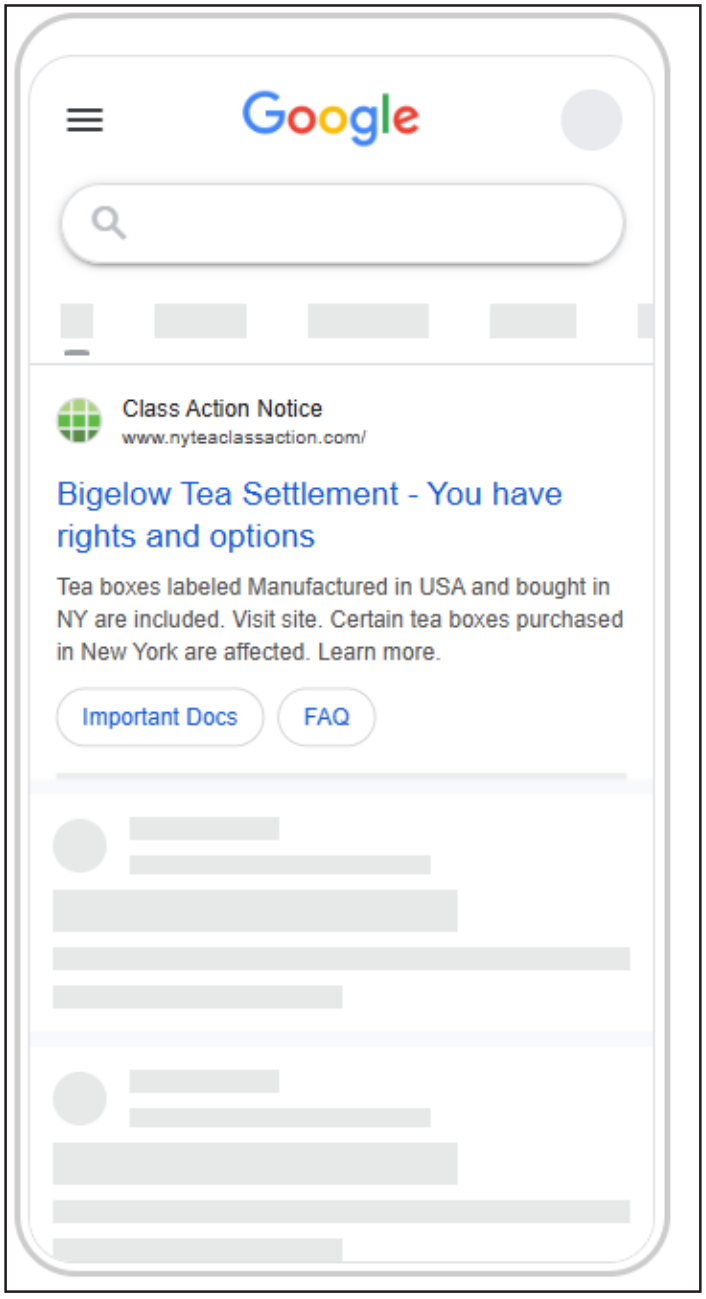


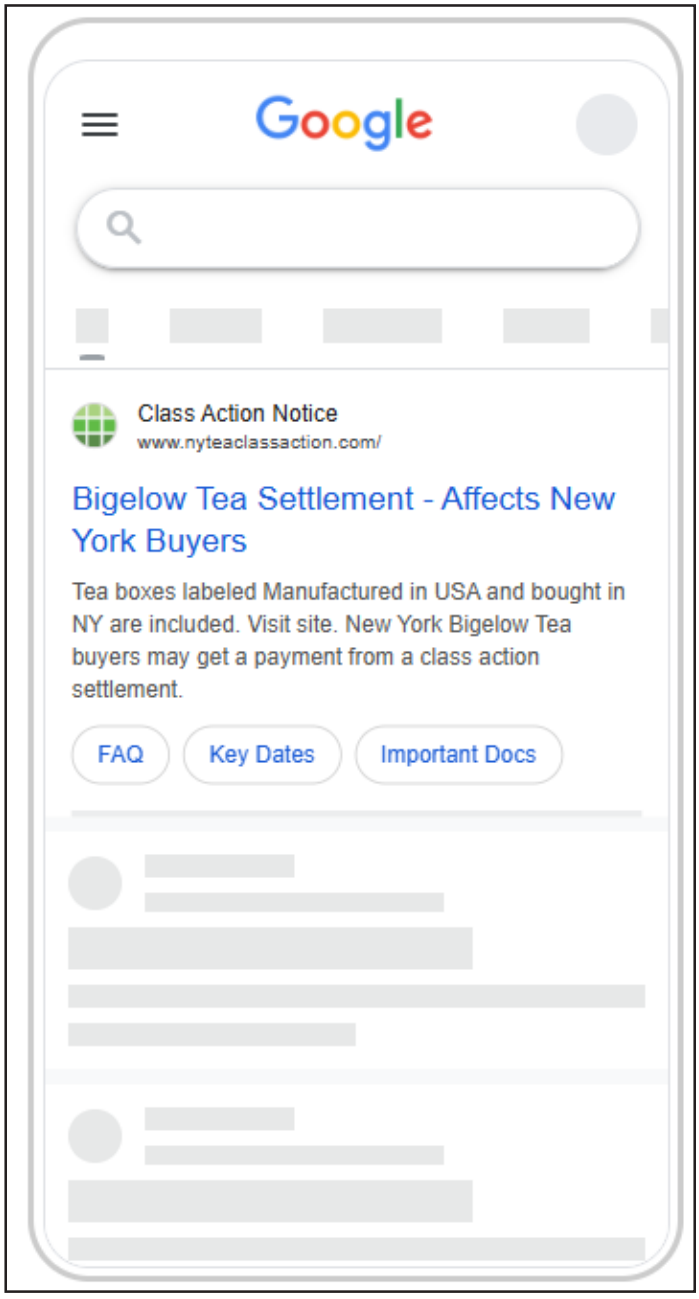




Search Response Ads 2

Mobile





Search Response Ads 3

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