

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:20-cv-01795-JLK

In re DENVER JAIL COVID-19 LITIGATION

Civil Action Nos.

1:21-cv-00302-JLK
1:21-cv-00091-JLK
1:21-cv-01216-JLK
1:21-cv-00015-JLK
1:20-cv-03590-JLK
1:21-cv-00122-JLK
1:20-cv-01795-JLK
1:21-cv-00014-JLK
1:21-cv-00173-JLK
1:21-cv-00116-JLK
1:21-cv-00656-JLK
1:21-cv-00362-JLK
1:21-cv-00162-JLK
1:21-cv-00839-JLK
1:21-cv-02747-JLK
1:21-cv-00157-JLK

PLAINTIFFS' MOTION TO APPROVE CLASS CERTIFICATION NOTICE PLAN

Plaintiffs, by and through their counsel of record, Bradley A. Levin, Robyn Levin, Gideon S. Irving, and Annika K. Adams of LEVIN SITCOFF PC, Rick D. Bailey of LAW OFFICE OF RICK D. BAILEY, ESQ., and Zachary D. Warren of HIGHLANDS LAW FIRM, respectfully request that the Court enter an order under Federal Rule of Civil Procedure 23(c)(2)(B) approving Plaintiffs' proposed form and manner of providing notice (the "Notice Plan"), ordering the Colorado Department of Corrections, the Division of Probation Services, and the Division of Parole Offices to assist in providing notice, and appointing EAG Gulf Coast, LLC ("EAG") as notice

administrator. In support thereof, Plaintiffs state as follows:

I. INTRODUCTION

Plaintiffs move for approval of their proposed Notice Plan, developed in conjunction with EAG, a professional notice administrator engaged by Plaintiffs. The Notice Plan is tailored to effectuate individual notice upon Class Members through mailings to last known addresses for individuals identified by Denver Health & Hospital Authority (“Denver Health”), the provider of health services at the Denver City and County Jails, as having tested positive for COVID-19 during the Class Period. The proposed method of notice will direct Class Members to a case website, where a comprehensive Long-Form Notice will be available in English and Spanish. The Long-Form Notice contains key information about the litigation and Class Members’ options, including the right to opt out by filing a request to the notice administrator via U.S. mail or the case website. The Long-Form Notice further instructs Class Members that they will be bound by any judgment in this litigation if they do not choose to opt out and contains multiple notations regarding the deadline for opting out. Pending this Court’s approval, the Long-Form Notice will also be electronically mailed or personally delivered to parolees and probationers identified by the Division of Probation and Division of Parole as being incarcerated in the Denver City and County Jails during the Class Period. The Notice Plan also includes a Short-Form Poster, which will be displayed at various community facilities which Class Members may frequent, including shelters, transitional living centers, and reentry service centers. Finally, pending this Court’s approval, the Short-Form Poster will be displayed at the Denver City and County Jails and Colorado Department of Corrections facilities.

The Notice Plan utilizes best practices for reaching a population which is inherently

difficult to reliably locate due to a multitude of factors, including economic instability and transient lifestyle, and is “the best notice that is practicable under the circumstances,” as it includes “individual notice to all members who can be identified through reasonable effort.” Fed. R. Civ. P. 23(c)(2)(B). The Long-Form Notice describes in concise and easily understood language the nature of the action, the composition of the Class, and the deadline to opt out of the Class. All of the information required under Rule 23(c)(2)(B) is readily available to Class Members through the Notice Plan.

Plaintiffs propose that EAG serve as the notice administrator for the Class. Plaintiffs solicited proposals from several notice administrators, and, subject to the Court’s approval, have selected EAG as the administrator that will most efficiently serve the interests of the Class. EAG has been appointed as the class notice and/or claims administrator in numerous large litigations and is well-equipped to serve as notice administrator in this action. Additional details concerning EAG’s qualifications are set forth in the Declaration of Brandon Schwartz, attached as Exhibit A herein.

CERTIFICATE OF CONFERRAL PURSUANT TO D.C.COLO.LCivR 7.1(A)

Pursuant to D.COLO.LCivR 7.1(a), undersigned counsel has conferred with counsel for Defendant City and County of Denver regarding the relief requested herein. Defendant does not oppose the proposed forms of notice or individual direct notice via the Long-Form Notice to last known addresses, including through the use of skip-tracing. Defendant does oppose the following aspects of the Notice Plan: that the Division of Probation and Division of Parole provide individual direct notice, that the Denver City and County Jails post the Short-Form Poster inside its facilities, and that the Colorado Department of Corrections post the Short-Form Poster inside its facilities.

Plaintiffs’ understanding of the dispute is that Defendant believes such posting would interfere with jail operations and/or that this Court does not have jurisdiction with respect to the Divisions of Probation and Parole and the Colorado Department of Corrections.

BACKGROUND

During and following the COVID-19 pandemic, individuals incarcerated at the Denver City and County Jails¹ brought cases forward alleging the City and County of Denver (“Defendant”) failed to protect them from contracting COVID-19 in violation of their constitutional rights. On February 25, 2021, this Court consolidated the cases and appointed undersigned counsel (“Class Counsel”) through the Court’s Civil Pro Bono Panel. [Doc. 37]. As more individuals continued to come forward, this Court directed Class Counsel “to consider whether it might be appropriate to assert claims on behalf of a class.” [Doc. 148]. Class Counsel heeded this Court’s advice and filed a Class Action Complaint on November 30, 2021, followed by an Amended Class Action Complaint on January 7, 2022. [Docs. 157, 183]. The Court issued an Order Granting Class Certification on March 8, 2024, certifying the following Classes (hereinafter, referred to as the “Class”):

Primary Class

All detainees who were placed in the custody of the Denver County Jails (combined facilities) and tested positive for the coronavirus while detained, excluding those detainees who tested positive at intake and did not contract the virus again while detained. The class period commenced on January 1, 2020, and ended February 1, 2022.

Denver County Jail Class

All detainees who were placed in the custody of the Denver County Jail and tested positive for the coronavirus while detained, excluding

¹ The Denver City and County Jails include two facilities, the Downtown Detention Center (“DDC”) and Denver County Jail (“COJL”). As used herein, the term “Denver City and County Jails” means both facilities.

those detainees who tested positive at intake and did not contract the virus again while detained. The class period commenced on January 1, 2020, and ended February 1, 2022.

Denver Downtown Jail Class

All detainees who were placed in the custody of the Van Cise-Simonet Downtown Detention Center and tested positive for the coronavirus while detained, excluding those detainees who tested positive at intake and did not contract the virus again while detained. The class period commenced on January 1, 2020, and ended February 1, 2022.

[Doc. 243].

After the Class was certified, Class Counsel began to obtain quotes from third-party administrators to develop and implement a certification notice plan to Class Members in accordance with Rule 23(c)(2)(B). Due to the unique nature of this matter, including Class Counsel's status as pro bono counsel, Class Counsel raised concerns about the costs associated with such a notice plan and whether it might be prudent to explore the possibility of settlement with Defendant, in which case only one notice, a combined certification and settlement notice, would be required, thereby greatly reducing the costs associated with litigating this action. To that end, the Parties began to discuss settlement and engaged in mediation with former Magistrate Judge Hegarty of JAMS on September 3, 2025. Efforts to resolve this matter were unsuccessful, and Plaintiffs are now moving forward with effectuating certification notice upon Class Members.

Importantly, while Class Counsel obtained funding for the certification notice plan from the Faculty of Federal Advocates ("FFA"), that funding was approved based on the initial estimate provided by EAG for the proposed Notice Plan. The FFA's grant does not currently extend to any additional expenses that may arise in this litigation, including any future settlement notice or other costs incurred in this matter. Accordingly, Class Counsel is concurrently filing a renewed Motion

to Shift Costs pursuant to Rule 23(d), requesting that the Court direct Defendant to share in the costs of providing notice to Class Members. Doing so will help ensure that existing resources are preserved for future stages of this litigation.

II. PLAINTIFFS' PROPOSED NOTICE PLAN

Plaintiffs respectfully submit that the Court should approve the proposed Notice Plan. The form and manner of the notice complies with Rule 23 and due process, as it provides individual notice to those identified by Denver Health as having contracted COVID-19 in the Denver City and County Jails during the Class Period, along with notice via a Short-Form Poster to be posted at facilities which may currently house Class Members, as well as community facilities which Class Members may frequent, such as shelters, reentry and transitional living centers, food banks, and addiction treatment centers. The Notice Plan further contemplates an order by this Court that the Colorado Department of Corrections and Denver City and County Jails post the Short-Form Poster at their respective facilities, as well as that the Division of Probation and Division of Parole provide Class Members who are probationers or parolees with the Long-Form Notice. Lastly, the Court should also appoint EAG as the notice administrator and approve of Plaintiffs' proposed schedule for the Notice Plan.

A. The Proposed Form of Notice Complies with Rule 23

Pursuant to Rule 23(c)(2)(B), "[t]he notice must clearly and concisely state in plain, easily understood language:

- (i) the nature of the action;
- (ii) the definition of the class certified;
- (iii) the class claims, issues, or defenses;
- (iv) that a class member may enter an appearance through an attorney if the member so desires;

- (v) that the court will exclude from the class any member who requests exclusion;
- (vi) the time and manner for requesting an exclusion; and
- (vii) the binding effect of a class judgment on members under Rule 23(c)(3).”

The proposed notice plan satisfies all of Rule 23(c)(2)(B)’s requirements. Plaintiffs worked in collaboration with EAG to design a Long-Form Notice, attached as Exhibit B, which contains all necessary information, but that is also written in plain English, is concise, and uses formatting and graphics which make the information conveyed clear and easy for readers to understand.

The first page of the Long-Form Notice contains a succinct graphic describing who is eligible to be a Class Member, why the individual is receiving the notice, and the individual’s options for what to do with the notice. The first page also directs individuals to the case website to learn more information. The second page features a table of contents that sets forth the information contained in the rest of the Long-Form Notice, including sections on how to remain in or opt out of the Class. The Long-Form Notice clearly explains in multiple places that Class Members who do not opt out will be bound by any judgment in this case and advises that Class Members may opt out and appear in the litigation through their own attorney.

The Long-Form Notice details the process for opting out of the Class by directing Class Members to submit their opt-out request, attached as Exhibit C, via U.S. mail to EAG using the included opt-out form and pre-paid return envelope or to complete the online opt-out form available on the case website. The Long-Form Notice includes three bold-typeface fonts providing the opt-out deadline, in a robust effort to notify Class Members of the date by which they must opt out if they do not want to be bound by any judgment in this matter. Further, the Long-Form Notice will explain that Class Members must opt out within 60 days following the issuance of the notice,

a greater period of time than those that have regularly been held to be sufficient to comply with due process requirements. For example, in *Miles Levin, et al. v. Board of Regents of the Univ. of Colo.*, Case No. 2020CV31409, (Colo. Dist. Ct. Mar. 7, 2023), the court approved a notice plan which provided class members with 45 days from the date of the issuance of the notice to opt out of the class action. In an abundance of caution, and to accommodate any issues that may arise in providing notice to Class Members, Class Counsel submit that 60 days is an appropriate amount of time to provide Class Members with the option to opt out of this litigation.

In addition to the Long-Form Notice, a Short-Form Poster, attached as Exhibit D, will be posted at various community facilities, including shelters, food banks, transitional living centers, and recovery centers. The Short-Form Poster is a one-page flyer which contains the same key information as the Long-Form Notice, including information regarding who is eligible to be a Class Member and the deadline for opting out. The Short-Form Poster advises Class Members that their rights may be affected should they choose not to opt out, and directs them to a case website which is printed out and can also be accessed on mobile devices via a scannable QR code.

B. The Proposed Manner of Notice Complies with Rule 23

Notice to Class Members in a class action certified under Rule 23(b)(3) must be the “best notice that is practicable under the circumstances, including individual notice to all members who can be identified through reasonable effort.” Fed. R. Civ. P. 23(c)(2)(B). The purpose of Rule 23’s notice requirements is to satisfy due process concerns by providing unnamed class members with the right to notice of certification, the pendency of the action, and afford them an opportunity to present their objections. *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156, 173-74 (1974). To that end, the Notice Plan utilizes a combination of direct notice and public postings targeted at reaching

Class Members, many of whom may be currently or formerly incarcerated or under government supervision or are otherwise difficult to locate due to housing instability or other socioeconomic factors.

i. Individual Direct Notice via U.S. Mail

Direct individual notice will be effectuated via U.S. Mail to the last known mailing address of each individual identified by Denver Health as having been incarcerated at the Denver City and County Jails during the Class Period and having tested positive for COVID-19 during the same, a total of 1,712 individuals. The direct individual notice will consist of the Long-Form Notice as well as an Opt-Out Form and a pre-paid return envelope. *See* Exhibits B, C. To identify the last known mailing addresses of Class Members, the notice administrator will perform a public records search, commonly called a “skip trace.” The skip trace will utilize information provided by Denver Health, primarily a name and DOB, to locate a current mailing address for an individual identified as a Class Member. The notice administrator will send the notices by U.S. Mail to any Class Members for whom the skip trace results in contact information, or to Class Members the notice administrator identifies as being incarcerated in the Colorado Department of Corrections. However, given the transient nature of the population of the Class, Class Counsel expects that some last known addresses will not be accurate. For any mail which is returned as undeliverable and for which there is a forwarding address, the notice administrator will forward the notice to the correct address. For mail which is returned as undeliverable and for which no current mailing address can be identified, Class Counsel believes the Short-Form Poster will help bolster efforts to notify Class Members of the pendency of this litigation and their right to opt-out, explained in more detail later in this section.

ii. Individual Direct Notice via the Division of Probation and Division of Parole

Many Class Members are expected to be under government supervision by the Division of Probation or Division of Parole. Because skip tracing will not result in contact information for all Class Members, in order to efficiently and effectively reach Class Members who may not have any reliable mailing address, Class Counsel proposes that this Court order the Division of Probation and Division of Parole identify probationers and parolees who were incarcerated at the Denver City and County Jails during the Class Period and email or personally deliver at check-ins the Long-Form Notice, attached as Exhibit B. This method of notice is virtually guaranteed to reliably inform Class Members of the pendency of this litigation, because although a Class Member may not have a reliable mailing address, if he or she is required to report to the Division of Probation or Division of Parole, the Class Member will presumably appear for said reporting or maintain regular communication with his or her probation or parole officer.

iii. Short-Form Poster

To reach Class Members who may have since been released from custody or are no longer under government supervision, or are otherwise at risk of not receiving individual notice, Class Counsel proposes a robust posting campaign in high-traffic locations known to serve justice-impacted individuals, including but not limited to: shelters, transitional and reentry housing programs, community-based reentry service providers, food banks, and addiction treatment and recovery centers. The posting campaign will consist of a Short-Form Poster, attached as Exhibit D, copies of which will be delivered to the relevant facilities along with a request for the facility to post the Short-Form Poster in a public area. Class Counsel proposes that the facilities post the Short-Form through the end of the opt-out period, 60 days following issuance of the Short-Form

Poster to the facilities. The notice administrator will provide the facilities described in Exhibit E with copies of the Short-Form Poster.

Class Counsel also proposes that this Court order the Colorado Department of Corrections and Denver City and County Jails post the Short-Form Poster in their respective facilities. The rationale behind this request is logical and simple: many individuals incarcerated at the Denver City and County Jails during the Class Period were pre-trial detainees, who may have since been sentenced to a period of incarceration in the Colorado Department of Corrections, or, in some instances, the Denver City and County Jails. Further, Class Members may have been re-arrested and may have returned to the Denver City and County Jails. As such, Class Counsel believes the displaying of the Short-Form Poster at these facilities will accomplish notice to Class Members who may not be identifiable through skip-tracing, or who may not be accurately entered into the facilities' systems and therefore will not receive individual direct notice. Class Counsel believes an order by this Court directing the Colorado Department of Corrections and Denver City and County Jails to post the Short-Form Poster in a high-traffic, public area of the facilities through the end of the opt-out period, 60 days following issuance of the Short-Form Poster, will result in a high likelihood that Class Members will receive notice. The notice administrator will provide the facilities described in Exhibit F with copies of the Short-Form Poster.

C. EAG is a Well-Qualified Notice Administrator

Class Counsel requests that this Court appoint EAG as the notice administrator. As mentioned above, EAG is an experienced notice administrator and has handled numerous class actions, including those involving incarcerated individuals. *See* Exhibit A. EAG's estimated costs and expenses are competitive and represent the most cost-effective way to effectuate notice in

accordance with Rule 23(c)(2)(B). Additionally, EAG has already been engaged with Class Counsel regarding the unique challenges of the Class population and has dedicated significant time and resources towards putting together a notice plan which balances the costs associated with providing notice with Class Counsel's desire and obligation to provide "the best notice that is practicable under the circumstances." Fed. R. Civ. P. 23(c)(2)(B).

D. Proposed Notice Plan Schedule

Plaintiffs consulted with EAG to determine the most realistic timeline for completing notice given the need to potentially adjust notice materials or methods based upon the rate of successful delivery through direct individual notice to Class Members and the possibility that multiple rounds of direct individual notice may need to be effectuated. To that end, Plaintiffs propose the following timeline:

Deadline for EAG to activate Case Website	No later than 45 days after the Court's approval of the Notice Plan
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Deadline for EAG to send Initial Notices via U.S. Mail	No later than 45 days after the Court's approval of the Notice Plan
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Deadline for the Colorado Division of Probation and Colorado Division of Parole to send Notices to individuals under supervision identified as possible Class Members	No later than 45 days after the Court's approval of the Notice Plan
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Deadline for the Colorado Department of Corrections and Denver City and County Jails to post the Short-Form Poster	No later than 45 days after the Court's approval of the Notice Plan
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Deadline for Class Members to opt-out 60 days after Initial Notices go out and Short-
Form Posters are posted

Deadline for Plaintiffs to file a notice advising 14 days after opt-out period ends
the Court of the complete execution of the
Notice Plan

III. CONCLUSION

Plaintiffs respectfully request that the Court approve the proposed Notice Plan, appoint EAG as Notice Administrator, and enter an order requiring the following: that the Division of Probation and Division of Parole identify individuals detained at the Denver City and County Jails during the Class Period currently under the supervision of the Divisions, that Colorado Department of Corrections facilities display the Short-Form in public areas in its facilities through the opt-out deadline, and that the Denver City and County Jails display the Short-Form Poster in public areas in its facilities through the opt-out deadline.

Dated this 30th day of October 2025.

Respectfully submitted,

LEVIN SITCOFF PC

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of October 2025 a true and correct copy of the foregoing **PLAINTIFFS' MOTION TO APPROVE CLASS CERTIFICATION NOTICE PLAN** was electronically filed with the Clerk of the Court using the CM/ECF system and served on the following by the method indicated which will send notification of said filing to the following email addresses:

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1:21-cv-00157-JLK

**DECLARATION OF BRANDON SCHWARTZ REGARDING NOTICE PLAN AND
ADMINISTRATION FOR CLASS CERTIFICATION**

I, BRANDON SCHWARZ, hereby declare and state as follows:

1. My name is Brandon Schwartz. I am over twenty-one and I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.
2. I am considered an expert in the field of legal notice and I have served as a legal notice expert in dozens of federal and state cases involving class action notice plans.

EXHIBIT A

3. I am a Director of Notice for Eisner Advisory Group LLC (“EAG”). I consult and advise clients on legal notice and settlement administration services across a wide spectrum of class action areas including healthcare, privacy, environmental, antitrust, product liability, insurance, and consumer class actions. I have over 15 years of legal consulting experience.

4. Before joining EAG, I held leadership roles at two nationally-recognized class action and mass tort settlement administration companies.

5. I have been personally involved in well over one hundred successful notice programs. I have been directly and personally involved in the designing of the notice planning here, including analysis of the individual notice options to reach the greatest practicable number of Class Members.

EXPERIENCE

6. Drawing upon over 15 years of extensive expertise in class action, advertising, media, and marketing, I have designed and implemented comprehensive notice solutions encompassing all facets of class action certification and settlement notice programs. My proficiency includes an understanding of email and postal distribution methodologies, reach and frequency analysis, strategic media generation, meticulous demographic research, media plan design, effective media development and procurement, commercial and video production creation, and the adept application of best practices for effective social media outreach.

7. I have designed, implemented, and managed notice campaigns for more than 100 cases. Some of my notice plans include: *H.K., et al. v. Google LLC*, Case No. CC 20LL00017 (Cir. Ct. 9th Jud. Dist., McDonough Cnty., Ill.); *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation* (non-settlement), No. 1:19-md-02875 (MDL No. 2875) (D.N.J.);

Rivera, et al. v. Google LLC, No. 2019-CH-009900 (Circuit Court of Cook County, IL); *Hezi v. Celsius Holdings, Inc.*, No. 1:21-cv-09892 (S.D.N.Y.); *Gilmore v. Monsanto*, No. 3:21-cv-8159 (N.D. Cal.); *Krommenhock v. Post Foods, LLC*, No. 3:16-cv-04958 (N.D. Cal.); *Hadley, et al. v. Kellogg Sales Company*, No. 5:16-cv-04955 (N.D. Cal.); *Jones v. Monsanto*, No. 4:19-cv-00102 (W.D. Mo.); *In re: Sonic Corp. Customer Data Breach Litigation*, No. 1:17-md-02807 (N.D. Ohio); *In re: Interior Molded Doors Indirect Purchaser Antitrust Litigation*, No. 3:18-cv-00850 (E.D. Va.); *Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico*, No. 2:10-md-02179 (E.D. La.); and the *Indian Residential Schools Settlement*, No. 00-cv-192059 (Ont. Super. Ct.). A description of my experience is attached as **Exhibit A-1**.

8. The courts have consistently acknowledged both the credibility of our team (curriculum vitae attached hereto as **Exhibit A-2**) and the effectiveness of our class action notice plans. Illustrative court opinions affirming the sufficiency of our notice plans include:

- a. In the matter *H.K. et al. v. Google LLC*, No. CC 20LL00017 (Cir. Ct. 9th Jud. Dist., McDonough Cnty., Ill.), Judge Heidi A. Benson ruled on October 17, 2025:

Pursuant to this Court's Order granting preliminary approval of the Settlement, Eisner Amper (formerly Postlethwaite & Netterville, APAC) served as Settlement Administrator. This Court finds that the Settlement Administrator performed all duties thus far required as set forth in the Settlement Agreement.

The Court finds that the Settlement Administrator has complied with the approved notice process as confirmed by its Declaration filed with the Court. The Court further finds that the Notice plan set forth in the Settlement as executed by the Settlement Administrator satisfied the requirements of Due Process and 735 ILCS 5/2-803. The Notice plan was reasonably calculated and constituted the best notice practicable to apprise Settlement Class Members of the nature of this litigation, the scope of the Settlement Class, the terms of the Settlement, the right of

Settlement Class Members to object to the Settlement or exclude themselves from the Settlement Class and the process for doing so, and of the Final Approval Hearing. Accordingly, the Court finds and concludes that the Settlement Class Members have been provided the best notice practicable under the circumstances, and that the Notice plan was clearly designed to advise the Settlement Class Members of their rights.

- b. In the matter *Brim v. Prestige Care Inc Data Breach*, No. 3:24-cv-05133

(W.D. Wash.), Judge Benjamin H. Settle ruled on April 21, 2025:

The Court finds that the dissemination of the Notice: (a) was implemented in accordance with the Preliminary Approval Order; (b) constituted the best notice practicable under the circumstances; (c) constituted notice that was reasonably calculated, under the circumstances, to apprise Settlement Class Members of (i) the nature of the Action, (ii) the definition of the class certified, (iii) the class claims, issues, or defenses; (iv) that a class member may enter an appearance through an attorney if the member so desires; (v) that the court will exclude from the class any member who timely requests exclusion; (vi) the time and manner for requesting exclusion; the binding effect of a class judgment on members under Rule 23(c)(3); (vii) Class Counsel's motion for a Fee Award and Expenses, (viii) Class Representatives' motion for Service Awards, (ix) their right to object to any aspect of the Settlement, Class Counsel's motion for a Fee Award and Expenses, and/or Class Representatives' motion for Service Awards; (d) constituted due, adequate and sufficient notice to all persons and entities entitled to receive notice of the proposed Settlement; and (e) was carried out as ordered by this Court's Preliminary Approval Order and satisfied the requirements of Rule 23 and the United States Constitution (including the Due Process Clause), and all other applicable law and rules.

- c. In the matter *Kandel, et al. v. Dr. Dennis Gross Skincare, LLC*, No. 1:23-cv-

01967 (S.D.N.Y.), Judge Edgardo Ramos ruled on October 31, 2024:

The Court finds that Class Notice has been disseminated to the Class in compliance with the Court's Preliminary Approval Order and the Notice Plan. The Court further finds that this provided the best notice to the Class practicable under the circumstances, fully satisfied due process, met the requirements

of Rule 23 of the Federal Rules of Civil Procedure, and complied with all other applicable law.

- d. In the matter *Gilmore et al. v. Monsanto Company, et al.*, No. 3:21-CV-8159

(N.D. Cal.), Judge Vince Chhabria ruled on March 31, 2023:

The Court finds that Class Notice has been disseminated to the Class in compliance with the Court's Preliminary Approval Order and the Notice Plan. The Court further finds that this provided the best notice to the Class practicable under the circumstances, fully satisfied due process, met the requirements of Rule 23 of the Federal Rules of Civil Procedure, and complied with all other applicable law.

- e. In the matter *Hadley, et al. v. Kellogg Sales Company*, No. 16-cv-04955 (N.D.

Cal.), Judge Lucy H. Koh ruled on November 23, 2021:

The Class Notice and claims submission procedures set forth in Sections 4 and 6 of the Settlement Agreement, and the Notice Plan filed on March 10, 2021, fully satisfy Rule 23 of the Federal Rules of Civil Procedure and the requirements of due process, were the best notice practicable under the circumstances, provided individual notice to all Settlement Class Members who could be identified through reasonable effort, and support the Court's exercise of jurisdiction over the Settlement Classes as contemplated in the Settlement Agreement and this Order. See Fed. R. Civ. P. 23(e)(2)(C)(ii).

PROPOSED NOTICE PLAN

9. Class Counsel has provided EAG with four data files containing COVID-19 testing results from the certified Class ("the Notice List"). EAG will analyze, deduplicate, and format the data files to facilitate the implementation of direct notice by mail to any Class Member currently identified in the Notice List. Further, in coordination with Class Counsel, EAG will distribute the notice to various community facilities such as shelters, food banks, transitional living centers, and addiction centers, and will request that it be placed in a prominent location so that visitors have an opportunity to view it.

Direct Notice

10. For any Class Member identified in the Notice List, EAG will mail the long form notice (**Exhibit B**) via United States Postal Service (“USPS”) First Class Mail. Prior to mailing, all mailing addresses would be checked against the National Change of Address (“NCOA”) database to ensure the accuracy and currency of Class Member address information for proper formatting and mail delivery. Additionally, the addresses will be validated through the Coding Accuracy Support System to uphold zip code precision, while Delivery Point Validation would be employed to verify mailing address accuracy. In the event that NCOA provides a more current mailing address for a Class Member, we would update the address accordingly. In instances where a long form notice is returned with forwarding mailing address information, we would re-send to the newly provided mailing address. For any long form notice that are returned as undeliverable, we would utilize standard skip-tracing techniques to obtain forwarding mailing address information. If skip-tracing yields an alternative forwarding mailing address, we would re-mail the notice to the mailing address identified through the skip-tracing process.

Case Website

11. A neutral, informational, website with an easy to remember domain name will be established where potential Class Members can obtain additional information and documents including the long form notice, Complaint, the Class Certification Order, answers to FAQs and any other information that the Court may require. The website will also include information on how potential Class Members can opt-out of the Class if they choose (see **Exhibit C** for the opt-out form). The website address will be prominently displayed in all printed notice documents.

Notice Administrator Contact Information

12. A dedicated toll-free number will be established and will be available 24 hours per day, seven days per week. Callers will hear an introductory message. Callers will then have the option to continue to get information about the lawsuit in the form of recorded answers to FAQs. Callers will also have an option to leave a voicemail and receive a call back from the Notice Administrator. For any Class Member currently incarcerated, with access to a telephone, and ability to make outbound calls, the Notice Administrator will return the voicemail and follow instructions provided by the correctional facility to speak with, or leave a message for, the incarcerated Class Member.

13. A postal mailing address and email address will be provided, allowing Class Members to request additional information or ask questions via these channels.

CONCLUSION

14. In class action notice planning, execution, and analysis, we are guided by due process considerations under the United States Constitution, by federal and local rules and statutes, and further by case law pertaining to notice. This framework directs that the notice program be designed to reach the greatest practicable number of potential Class Members. These requirements will be met in this case.

15. Our notice effort follows the guidance for how to satisfy due process obligations that a notice expert gleans from the United States Supreme Court's seminal decisions, which are: a) to endeavor to actually inform the class, and b) to demonstrate that notice is reasonably calculated to do so:

- a. "But when notice is a person's due, process which is a mere gesture is not

due process. The means employed must be such as one desirous of actually informing the absentee might reasonably adopt to accomplish it,” *Mullane v. Central Hanover Trust*, 339 U.S. 306, 315 (1950).

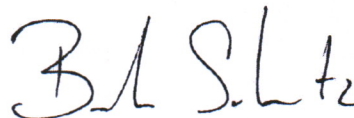
- b. “[N]otice must be reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections,” *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156 (1974) citing *Mullane* at 314.

16. The Notice Program will provide the best notice practicable under the circumstances of this case, conforms to all aspects of Federal Rule of Civil Procedure 23, and comports with the guidance for effective notice articulated in the Manual for Complex Litigation 4th Ed.

17. The Notice Plan schedule will afford enough time to provide full and proper notice to Class Members before the opt-out deadline.

18. At the conclusion of the Notice Plan, we will provide a final report verifying its effective implementation.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on this 30th day of October, 2025 in Portland, Oregon.

A handwritten signature in black ink, appearing to read "B. Schwartz", written over a horizontal line.

Brandon Schwartz



Brandon Schwartz



Brandon Schwartz is the Director of Notice for Eisner Advisory Group LLC ("EAG"), where he leads the strategy and execution of innovative legal notice programs for complex class actions and claims administration. With over 15 years of industry experience, he brings deep expertise in crafting effective, compliant, and results-driven notice solutions tailored to the unique demands of each case.

Brandon is widely recognized for his command of modern notice tactics, including cutting-edge digital and social media campaigns, email and direct mail distribution, demographic targeting, and reach and frequency analysis. His deep understanding of Fed R. Civ 23 ensures that notice plans meet the highest standards of compliance while maximizing reach and effectiveness.

A published author on topics related to legal notice, Brandon has led the design and delivery of notice campaigns in hundreds of matters spanning antitrust, consumer, privacy, securities litigation, and more. Prior to joining EAG, Brandon was the Director of Notice and Media for a large claims administrator where he oversaw high-profile national campaigns and built a reputation for precision, creativity, and reliability in legal notice.

EDUCATION & CREDENTIALS

- Bachelor of Science, Marketing, University of Illinois at Chicago
- Bachelor of Science, Management, University of Illinois at Chicago
- Legal Notice Expert

ARTICLES

- Case Study: Effective Notice Leads to High Claims Rate
- Legal Notice and Social Media: How to Win the Internet
- Rule 23 Changes: Avoid Delays in Class Settlement Approval
- Rule 23 Changes: How Electronic Notice Can Save Money
- Tackling Digital Class Notice with Rule 23 Changes
- What to Expect: California's Northern District Procedural Guidance Changes

SPEAKING ENGAGEMENTS

- Class Action Law Forum: The Increase of Fraud in Class Actions and Mass Torts, Plus Ethics of Third-Party Filers, San Diego, March 13, 2024
- Class Action Law Forum: Notice and Administration: Fraud and Third-Party Filers, San Diego, CA, March 18, 2023
- Class Action Law Forum: Settlement and Notice & Claims Trends, San Diego, CA, March 18, 2022
- Class Action Law Forum: Consumer Class Actions, San Diego, CA, March 5, 2020
- Class Action Mastery: Best Practices in Claims Settlement Administration, HB Litigation Conference, San Diego, CA, January 17, 2019
- Class Action Mastery: Communication with the Class, HB Litigation Conference, New York, NY, May 10, 2018

SAMPLE JUDICIAL COMMENTS

- **Milan, et al. v. Clif Bar and Company**, Case No. 1:18-cv-02354 (N.D. Cal.), Judge James Donato ruled on March 21, 2025:

The distribution of the Class Notice pursuant to the Class Notice Program constituted the best notice practicable under the circumstances, and fully satisfies the requirements of Federal Rule of Civil Procedure 23 and the requirements of due process.

- **Meholic, et al. v. Seattle Arena Company**, Case No. 24-2-06283-1 (Wash. Super. Ct.), Judge Lindsey M. Teppner ruled on January 3, 2025:

The Court finds that the Notice Program provided for in the Settlement Agreement and effectuated pursuant to the Preliminary Approval Order: (i) was the best notice practicable under the circumstances; (ii) was reasonably calculated to provide, and did provide due and sufficient notice to the Settlement Class regarding the existence and nature of the Action, certification of the Settlement Class for settlement purposes only, the existence and terms of the Settlement Agreement, and the rights of Settlement Class Members to exclude themselves from the settlement, to object and appear at the Final Fairness Hearing, and to receive benefits under the Settlement Agreement; and (iii) satisfied the requirements of the Washington Rules of Civil Procedure, the United States Constitution, and all other applicable law.

- **Kandel, et al. v. Dr. Dennis Gross Skincare, LLC**, Case No. 1:23-cv-01967 (S.D.N.Y.), Judge Edgardo Ramos ruled on October 31, 2024:

The Court finds that distribution of the Notice constituted the best notice practicable under the circumstances, and constituted valid, due, and sufficient notice to all members of the Settlement Class. The Court finds that such notice complies fully with the requirements of Fed. R. Civ. P. 23, the Constitution of the United States, and any other applicable laws...The Court finds and determines that the notice procedure carried out by EAG Gulf Coast LLC afforded adequate protections to Settlement Class members and provides the basis for the Court to make an informed decision regarding approval of the Settlement based on the responses of Settlement Class members. The Court finds and determines that the Notice was the best notice practicable, and has satisfied the requirements of law and due process.

- **Andrade-Heymsfield v. NextFoods, Inc.**, Case No. 3:21-cv-1446 (S.D. Cal.), Judge Barry T. Moskowitz ruled on April 8, 2024:

The Court previously approved the parties' proposed notice procedures. (ECF No. 56). In the motion for final approval, Plaintiff represents that the approved notice plan was executed. (ECF No. 59 at 9). "Notice was provided to Class Members via newspaper, a press release, and various digital means," including "display banner advertising, keyword search online advertising, and social media advertising through Facebook, Instagram, TikTok and YouTube, delivering over 120 million targeted impressions." (Id.)...In light of these actions and the Court's prior order granting preliminary approval, the Court finds that the parties have provided sufficient notice to the class members.



- **Hymes v. Earl Enterprises Holdings**, Case No. 6:19-cv-00644 (M.D. Fla.), Judge A. James Craner ruled on February 20, 2024:

The Court finds that the form content, and method of giving notice to the Settlement Class as described in Article VII of the Settlement Agreement (including the exhibits thereto): (a) was the best practicable notice to the Settlement Class; (b) was reasonably calculated to apprise Settlement Class Members of the pendency of the action, the terms of the proposed Settlement, and their rights under the proposed Settlement, including but not limited to their rights to object to or exclude themselves from the proposed Settlement and other rights under the terms of the Settlement Agreement; (c) was reasonable and constituted due, adequate, and sufficient notice to all Class Members and other persons entitled to receive notice; and (d) met all applicable requirements of law, including the Florida Rules of Civil Procedure, and met the Due Process Clause(s) of the United States Constitution. The Court further finds that the Notice was written in plain language, used simple terminology, and was designed to be readily understandable by Class Members.

- **Tucker v. Marietta Area Health Care Inc.**, Case No. 2:22-cv-00184 (S.D. Ohio), Judge Sarah D. Morrison ruled on December 7, 2023:

The Court's Preliminary Approval Order approved the Short Form Settlement Notice, Long Form Notice, and Claim Form, and found the mailing, distribution, and publishing of the various notices as proposed met the requirements of Fed. R. Civ. P. 23 and due process, and was the best notice practicable under the circumstances, constituting due and sufficient notice to all persons entitled to notice. The roughly 6.2% claims rate supports a finding that the Notice Program was sufficient...The Court finds that the distribution of the Notices has been achieved pursuant to the Preliminary Approval Order and the Settlement Agreement, and that the Notice to Class Members complied with Fed. R. Civ. P. 23 and due process.

- **Easter v Sound Generations**, Case No. 21-2-16953-4 (Wash. Super.), Judge James E. Rogers on July 14, 2023:

The Court has determined that the Notice given to the Settlement Class Members in accordance with the Preliminary Approval Order fully and accurately informed Settlement Class Members of all material terms of the Settlement and constituted the best notice practicable under the circumstances, and fully satisfied the requirements of Civil Rule 23, applicable law, and the due process clauses of both the U.S. and Washington Constitutions.

- **Hezi v. Celsius Holdings, Inc.**, Case No. 1:21-CV-09892-VM (S.D.N.Y.), Judge Jennifer H. Rearden on April 5, 2023:

The Court finds and determines that the notice procedure carried out by Claims Administrator Postlethwaite & Netterville, APAC ("P&N") afforded adequate protections to Class Members and provides the basis for the Court to make an informed decision regarding approval of the Settlement based on the responses of Class Members. The Court finds and determines that the Notice was the best notice practicable, and has satisfied the requirements of law and due process.



- **Gilmore, et al. v. Monsanto Company, et al.**, Case No. 3:21-CV-8159 (N.D. Cal.), Judge Vince Chhabria on March 31, 2023:

The Court finds that Class Notice has been disseminated to the Class in compliance with the Court's Preliminary Approval Order and the Notice Plan. The Court further finds that this provided the best notice to the Class practicable under the circumstances, fully satisfied due process, met the requirements of Rule 23 of the Federal Rules of Civil Procedure, and complied with all other applicable law.

- **John Doe, et al. v. Katherine Shaw Bethea Hospital and KSB Medical Group, Inc.**, Case No. 2021L00026 (Ill. Cir. Ct., 15th Jud. Cir.), on March 28, 2023:

The Court has determined that the notice given to the Settlement Class Members, in accordance with the Preliminary Approval Order, fully and accurately informed Settlement Class Members of all material elements of the Settlement and constituted the best notice practicable under the circumstances, and fully satisfied the requirements of 735 ILCS 5/2-803, applicable law, and the Due Process Clauses of the U.S. Constitution and Illinois Constitution.

- **In re Forefront Data Breach Litigation**, Case No. 1:21-cv-00887-LA (E.D. Wis.), Judge Lynn Adelman on March 22, 2023:

The Court finds that the dissemination of Notice to Settlement Class Members: (a) was implemented in accordance with the Preliminary Approval Order; (b) constituted the best notice practicable under the circumstances; (c) constituted notice that was reasonably calculated, under the circumstances, to apprise Class Members of (i) the pendency of the Action; (ii) their right to submit a claim (where applicable) by submitting a Claim Form; (iii) their right to exclude themselves from the Settlement Class; (iv) the effect of the proposed Settlement (including the releases to be provided thereunder); (v) Class Counsel's motion for a Fee Award and Costs and for Service Awards to the Class Representatives; (vi) their right to object to any aspect of the Settlement, and/or Class Counsel's motion for Service Awards to the Class Representatives and for a Fee Award and Costs; and (vii) their right to appear at the Final Approval Hearing; (d) constituted due, adequate, and sufficient notice to all natural persons entitled to receive notice of the proposed Settlement; and (e) satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure, the Constitution of the United States (including the Due Process Clause), and all other applicable laws and rules.

- **Sanders, et al. v. Ibex Global Solutions, Inc., et al.**, Case No. 1:22-CV-00591 (D.D.C.), Judge Trevor N. McFadden on March 10, 2023:

An affidavit or declaration of the Settlement Administrator's compliance with the Notice process has been filed with the Court. The Notice process as set forth in the Settlement Agreement and ordered in the Preliminary Approval Order constitutes the best notice practicable under the circumstances and constitutes valid, due, and sufficient notice to all Class Members in accordance with the requirements of Federal Rule of Civil Procedure 23(c)(2).



- **Pagan, et al. v. Faneuil, Inc.,** Case No. 3:22-CV-297 (E.D. Va), Judge Robert E. Payne on February 16, 2023:

The Court finds that the Notice Program, set forth in the Settlement Agreement and effectuated pursuant to the Preliminary Approval Order, was the best notice practicable under the circumstances, was reasonably calculated to provide and did provide due and sufficient notice to the Settlement Class of the pendency of the Action, certification of the Settlement Class for settlement purposes only, the existence and terms of the Settlement Agreement, and their right to object and to appear at the final approval hearing or to exclude themselves from the Settlement Agreement, and satisfied the requirements of the Federal Rules of Civil Procedure, the United States Constitution, and other applicable law.

- **LaPrairie v. Presidio, Inc., et al.,** Case No. 1:21-CV-08795-JFK (S.D.N.Y.), Judge Andrew L. Carter, Jr. on December 12, 2022:

The Court hereby fully, finally and unconditionally approves the Settlement embodied in the Settlement Agreement as being a fair, reasonable and adequate settlement and compromise of the claims asserted in the Action. The Class Members have been given proper and adequate notice of the Settlement, fairness hearing, Class Counsel's application for attorneys' fees, and the service award to the Settlement Class Representative. An affidavit or declaration of the Settlement Administrator's compliance with the Notice process has been filed with the Court. The Notice process as set forth in the Settlement Agreement and ordered in the Preliminary Approval Order constitutes the best notice practicable under the circumstances and constitutes valid, due, and sufficient notice to all Class Members in accordance with the requirements of Federal Rule of Civil Procedure 23(c)(2).

- **Nelson v. Bansley & Kiener, LLP,** Case No. 2021-CH-06274 (Circuit Court of Cook County, IL), Judge Sophia H. Hall on November 30, 2022:

The court finds that such Notice as therein ordered, constitutes the best possible notice practicable under the circumstances and constitutes valid, due, and sufficient notice to all Settlement Class Members in compliance with requirements of 735 ILCS 5/2-801, et seq.

- **Buck, et al. v. Northwest Commercial Real Estate Investments, LLC, et al.,** Case No. 21-2-03929-1-SEA (Superior Court King County, WA), Judge Douglass A. North on September 30, 2022:

Pursuant to the Court's Preliminary Approval Order, Postcard Notice was distributed to the Class by First Class mail and Email Notice was distributed to all Class Members for whom the Settlement Administrator had a valid email address. The Court hereby finds and concludes that Postcard and Email Notice was disseminated to members of the Settlement Class in accordance with the terms set forth in the Settlement and in compliance with the Court's Preliminary Approval Order. The Court further finds and concludes that the Postcard and Email Notice, and the distribution procedures set forth in the Settlement fully satisfy CR 23(c)(2) and the requirements of due process, were the best notice practicable under the circumstances, provided individual notice to all members of the Class who could be identified through reasonable effort, provided an opportunity for the Class Members to object or exclude themselves from the Settlement,



and support the Court's exercise of jurisdiction over the Settlement Class Members as contemplated in the Settlement and this Final Approval Order.

- **Rivera, et al. v. Google LLC**, Case No. 2019-CH-00990 (Cir. Ct. Cook Cnty., Ill.), Judge Anna M. Loftus on September 28, 2022:

Pursuant to this Court's Order granting preliminary approval of the Settlement, Postlethwaite & Netterville, APAC ("P&N") served as Settlement Administrator. This Court finds that the Settlement Administrator performed all duties thus far required as set forth in the Settlement Agreement.

The Court finds that the Settlement Administrator has complied with the approved notice process as confirmed by its Declaration filed with the Court. The Court further finds that the Notice plan set forth in the Settlement as executed by the Settlement Administrator satisfied the requirements of Due Process and 735 ILCS 5/2-803. The Notice plan was reasonably calculated and constituted the best notice practicable to apprise Settlement Class Members of the nature of this litigation, the scope of the Settlement Class, the terms of the Settlement, the right of Settlement Class Members to object to the Settlement or exclude themselves from the Settlement Class and the process for doing so, and of the Final Approval Hearing. Accordingly, the Court finds and concludes that the Settlement Class Members have been provided the best notice practicable under the circumstances, and that the Notice plan was clearly designed to advise the Settlement Class Members of their rights.

- **Patricia Davidson, et al. v. Healthgrades Operating Company, Inc.**, Case No. 21-cv-01250-RBJ (D. Colo), Judge R. Brooke Jackson on August 22, 2022:

The Court finds that such Notice as therein ordered, constitutes the best possible notice practicable under the circumstances and constitutes valid, due, and sufficient notice to all Settlement Class Members in compliance with the requirements of Federal Rule of Civil Procedure 23(c)(2).

- **Hosch, et al. v. Drybar Holdings LLC**, Case No. 2021-CH-01976 (Circuit Court of Cook County, IL), Judge Pamela M. Meyerson on June 27, 2022:

The Court has determined that the Notice given to the Settlement Class Members, in accordance with the Preliminary Approval Order, fully and accurately informed Settlement Class Members of all material elements of the Settlement and constituted the best notice practicable under the circumstances, and fully satisfied the requirements of 735 ILCS 5/2-803, applicable law, and the Due Process Clauses of the U.S. Constitution and Illinois Constitution.

- **Baldwin, et al. v. National Western Life Insurance Company**, 2:21-cv-04066-WJE (W.D. MO), Judge Willie J. Epps, Jr. on June 16, 2022:

The Court finds that such Notice as therein ordered, constituted the best possible notice practicable under the circumstances and constitutes valid, due, and sufficient notice to all Settlement Class Members in compliance with the requirements of Rule 23(c)(2).



- **Chapman, et al. v. voestalpine Texas Holding LLC**, Case No. 2:17-cv-174 (S.D. Tex.), Judge Nelva Gonzales Ramos on June 15, 2022:

The Class and Collective Notice provided pursuant to the Agreement and the Order Granting Preliminary Approval of Class Settlement:

- (a) *Constituted the best practicable notice, under the circumstances;*
- (b) *Constituted notice that was reasonably calculated to apprise the Class Members of the pendency of this lawsuit, their right to object or exclude themselves from the proposed settlement, and to appear at the Fairness Hearing;*
- (c) *Was reasonable and constituted due, adequate, and sufficient notice to all persons entitled to receive notice; and*
- (d) *Met all applicable requirements of the Federal Rules of Civil Procedure and the Due Process Clause of the United States Constitution because it stated in plain, easily understood language the nature of the action; the definition of the class certified; the class claims, issues, or defenses; that a class member may enter an appearance through an attorney if the member so desires; that the court will exclude from the class any member who requests exclusion; the time and manner for requesting exclusion; and the binding effect of a class judgment on members under Rule 23(c)(3).*

- **Hanson v. Welch Foods Inc.**, Case No. 3:20-cv-02011 (N.D. Cal.), Judge Joseph C. Spero on April 15, 2022:

The Class Notice and claims submission procedures set forth in Sections 5 and 9 of the Settlement Agreement, and the Notice Plan detailed in the Declaration of Brandon Schwartz filed on October 1, 2021, fully satisfy Rule 23 of the Federal Rules of Civil Procedure and the requirements of due process, were the best notice practicable under the circumstances, provided individual notice to all Settlement Class Members who could be identified through reasonable effort, and support the Court's exercise of jurisdiction over the Settlement Class as contemplated in the Settlement Agreement and this Order. See Fed. R. Civ. P. 23(e)(2)(C)(ii).

- **McMorrow, et al. v. Mondelez International, Inc.**, No. 17-cv-02327 (S.D. Cal.), Judge Cynthia Bashant on April 8, 2022:

Notice was administered nationwide and achieved an overwhelmingly positive outcome, surpassing estimates from the Claims Administrator both in the predicted reach of the notice (72.94% as compared to 70%) as well as in participation from the class (80% more claims submitted than expected). (Schwartz Decl. ¶ 14, ECF No. 206-1; Final App. Mot. 3.) Only 46 potential Class Members submitted exclusions (Schwartz Decl. ¶ 21), and only one submitted an objection—however the objection opposes the distribution of fees and costs rather than the settlement itself. (Obj. 3.) The Court agrees with Plaintiffs that the strong claims rate, single fee-related objection, and low opt-out rate weigh in favor of final approval.

- **Hadley, et al. v. Kellogg Sales Company**, No. 16-cv-04955 (N.D. Cal.), Judge Lucy H. Koh on November 23, 2021:

The Class Notice and claims submission procedures set forth in Sections 4 and 6 of the Settlement Agreement, and the Notice Plan filed on March 10, 2021, fully satisfy Rule 23 of the Federal Rules of Civil Procedure and the requirements of due process, were the best notice practicable under the circumstances, provided individual notice to all



Settlement Class Members who could be identified through reasonable effort, and support the Court's exercise of jurisdiction over the Settlement Classes as contemplated in the Settlement Agreement and this Order. See Fed. R. Civ. P. 23(e)(2)(C)(ii).

- **Miracle-Pond, et al. v. Shutterfly, Inc.**, No. 2019-CH-07050 (Cir. Ct. Cook Cnty., Ill.), Judge Raymond W. Mitchell on September 9, 2021:

This Court finds that the Settlement Administrator performed all duties thus far required as set forth in the Settlement Agreement. The Court finds that the Settlement Administrator has complied with the approved notice process as confirmed by its Declaration filed with the Court. The Court further finds that the Notice plan set forth in the Settlement as executed by the Settlement Administrator satisfied the requirements of Due Process and 735 ILCS 5/2-803. The Notice plan was reasonably calculated and constituted the best notice practicable to apprise Settlement Class Members of the nature of this litigation, the scope of the Settlement Class, the terms of the Settlement, the right of Settlement Class Members to object to the Settlement or exclude themselves from the Settlement Class and the process for doing so, and of the Final Approval Hearing. Accordingly, the Court finds and concludes that the Settlement Class Members have been provided the best notice practicable under the circumstances, and that the Notice plan was clearly designed to advise the Settlement Class Members of their rights.

- **In re: Interior Molded Doors Indirect Purchasers Antitrust Litigation**, No. 3:18-cv-00850 (E.D. Va.), Judge John A. Gibney on July 27, 2021:

The notice given to the Settlement Class of the settlement set forth in the Settlement Agreement and the other matters set forth herein was the best notice practicable under the circumstances. Said notice provided due and adequate notice of the proceedings and of the matters set forth therein, including the proposed settlement set forth in the Settlement Agreement, to all persons and entities entitled to such notice, and said notice fully satisfied the requirements of Rules 23(c)(2) and 23(e) and the requirements of due process.

- **Krommenhock, et al. v. Post Foods, LLC**, No. 16-cv-04958 (N.D. Cal.), Judge William H. Orrick on June 25, 2021:

The Class Notice and claims submission procedures set forth in Sections 4 and 6 of the Settlement Agreement and the Notice Plan filed on January 18, 2021 fully satisfy Rule 23 of the Federal Rules of Civil Procedure and the requirements of due process, were the best notice practicable under the circumstances, provided individual notice to all Settlement Class Members who could be identified through reasonable effort, and support the Court's exercise of jurisdiction over the Settlement Classes as contemplated in the Settlement Agreement and this Order. See Fed. R. Civ. P. 23(e)(2)(C)(ii).

- **Lisa Jones, et al. v. Monsanto Company, et al.**, No. 4:19-cv-00102-BP (W.D. Mo.), Chief Judge Beth Phillips on May 13, 2021:

The Court also notes that there has been only one objection filed, and even the Objector has not suggested that the amount of the settlement is inadequate or that the notice or the method of disseminating the notice was inadequate to satisfy the requirements of the Due Process Clause or was otherwise infirm...However, with respect to the Rule 23(e)



factors, the Court finds that the process used to identify and pay class members and the amount paid to class members are fair and reasonable for settlement purposes.

- **Winters, et al. v. Two Towns Ciderhouse Inc.**, No. 3:20-cv-00468-BAS-BGS (S.D. Cal.), Judge Cynthia Bashant on May 11, 2021:

The settlement administrator, Postlethwaite and Netterville, APAC ("P&N") completed notice as directed by the Court in its Order Granting Preliminary Approval of the Class Action Settlement. (Decl. of Brandon Schwartz Re: Notice Plan Implementation and Settlement Administration ("Schwartz Decl.") ¶¶ 4–14, ECF No. 24-5.)...Notice via social media resulted in 30,633,610 impressions. (Schwartz Decl. ¶4.) Radio notice via Spotify resulted in 394,054 impressions. (Id. ¶ 5.) The settlement website received 155,636 hits, and the toll-free number received 51 calls. (Id. ¶¶ 9, 14.). Thus, the Court finds the Notice complies with due process.

- **Siddle, et al. v. The Duracell Company, et al.**, No. 4:19-cv-00568 (N.D. Cal.), Judge James Donato on April 19, 2021:

The Court finds that the Class Notice and Claims Administration procedures set forth in the Agreement fully satisfy Rule 23 of the Federal Rules of Civil Procedure and the requirements of due process, were the best notice practicable under the circumstances, provided due and sufficient individual notice to all persons in the Settlement Class who could be identified through reasonable effort, and support the Court's exercise of jurisdiction over the Settlement Class as contemplated in the Agreement and this Final Approval Order.

- **Fabricant v. Amerisave Mortgage Corporation**, No. 19-cv-04659-AB-AS (C.D. Cal.), Judge Andre Birotte, Jr. on November 25, 2020:

The Class Notice provided to the Settlement Class conforms with the requirements of Fed. Rule Civ. Proc. 23, the California and United States Constitutions, and any other applicable law, and constitutes the best notice practicable under the circumstances, by providing individual notice to all Settlement Class Members who could be identified through reasonable effort, and by providing due and adequate notice of the proceedings and of the matters set forth therein to the other Settlement Class Members. The notice fully satisfied the requirements of Due Process. No Settlement Class Members have objected to the terms of the Settlement.

- **Edward Makaron, et al. v. Enagic USA, Inc.**, 2:15-cv-05145 (C.D. Cal.), Judge Dean D. Pregerson on January 16, 2020:

The Court makes the following findings and conclusions regarding notice to the Class:

a. The Class Notice was disseminated to persons in the Class in accordance with the terms of the Settlement Agreement and the Class Notice and its dissemination were in compliance with the Court's Preliminary Approval Order;

b. The Class Notice: (i) constituted the best practicable notice under the circumstances to potential Class Members, (ii) constituted notice that was reasonably calculated, under the circumstances, to apprise Class Members of the pendency of the Action, their right to object or to exclude themselves from the proposed Settlement, and their right to appear at the Final Approval Hearing, (iii) was reasonable and constituted due, adequate, and



sufficient individual notice to all persons entitled to be provided with notice, and (iv) complied fully with the requirements of Fed. R. Civ. P. 23, the United States Constitution, the Rules of this Court, and any other applicable law.

- **John Karpilovsky and Jimmie Criollo, Jr., et al. v. All Web Leads, Inc.**, 1:17-cv-01307 (N.D. Ill.), Judge Harry D. Leinenweber on August 8, 2019:

The Court hereby finds and concludes that Class Notice was disseminated to members of the Settlement Class in accordance with the terms set forth in the Settlement Agreement and that Class Notice and its dissemination were in compliance with this Court's Preliminary Approval Order.

The Court further finds and concludes that the Class Notice and claims submission procedures set forth in the Settlement Agreement fully satisfy Rule 23 of the Federal Rules of Civil Procedure and the requirements of due process, were the best notice practicable under the circumstances, provided individual notice to all Settlement Class Members who could be identified through reasonable effort, and support the Court's exercise of jurisdiction over the Settlement Class as contemplated in the Settlement and this Order.

- **Hartig Drug Company Inc. v. Senju Pharmaceutical LTD. and Allergan, Inc.**, 1:14-cv-00719 (D. Del.), Judge Joseph F. Bataillon on May 3, 2018:

The Court approves the proposed notice program, including the Mail Notice and the Publication Notice, attached as Exhibits A and B to the Declaration of Brandon Schwartz of Garden City Group in support of Plaintiff's Unopposed Motion to Distribute Notice to the Settlement Class ("Schwartz Declaration"). The Court further approves the claim form attached as Exhibit C to the Schwartz Declaration. The Court finds that the manner of notice proposed constitutes the best practicable notice under the circumstances as well as valid, due, and sufficient notice to all persons entitled thereto and complies fully with the requirements of the Federal Rule of Civil Procedure 23...

- **Gordon v. Hain Celestial Group, et al.**, 1:16-cv-06526 (S.D.N.Y.), Judge Katherine B. Forrest on September 22, 2017:

The form, content, and method of dissemination of the Class Notice given to Settlement Class Members - as previously approved by the Court in its Preliminary Approval Order - were adequate and reasonable, constituted the best notice practicable under the circumstances, and satisfied the requirements of Rule 23 (c) and (e) and Due Process.

- **In re: Sony PS3 "Other OS" Litigation**, 4:10-cv-01811 (N.D. Cal.), Judge Yvonne Gonzalez Rogers on June 8, 2018:

The Court finds that the program for disseminating notice to the Class provided for in the Settlement, and previously approved and directed by the Court (the "Notice Program"), has been implemented by the Settlement Administrator and the Parties, and that such Notice Program, including the approved forms of notice, constitutes the best notice practicable under the circumstances and fully satisfied due process, the requirements of Rule 23 of the Federal Rules of Civil Procedure and all other applicable laws.



- ***In re: Ductile Iron Pipe Fittings ("DIPF") Indirect Purchaser Antitrust Litigation***, 3:12-cv-00169 (D.N.J.), Judge Anne E. Thompson on June 8, 2016:

Notice of the Settlement Agreements to the Settlement Classes required by Rule 23(e) of the Federal Rules of Civil Procedure, including the additional forms of notice as approved by the Court, has been provided in accordance with the Court's orders granting preliminary approval of these Settlements and notice of the Settlements, and such Notice has been given in an adequate and sufficient manner; constitutes the best notice practicable under the circumstances; and satisfies Federal Rules of Civil Procedure 23(c)(2)(B) and due process.



LEGAL NOTICE CASES

<i>Lewis v. Lytx Inc.</i> , Case No. 3:22-CV-00046 (S.D. Ill.)
<i>Doe, et al. v. San Diego Fertility Center Medical Group, Inc., et al.</i> , Case No. 37-2024-00006118 (Cal. Super. Ct.)
<i>Tapia-Rendon, et al. v. Workeasy Software, LLC</i> , Case No. 1:21-cv-3400 (N.D. Ill.)
<i>Meholic, et al. v. Seattle Arena Company</i> , Case No. 24-2-06283-1 (Wash. Super. Ct.)
<i>Cadena, et al. v. American Honda Motor Co., Inc.</i> , Case No. CV 18-4007 (C.D. Cal.)
<i>In Re: Hapy Bear Surgery Center Data Security Incident Litigation</i> , Case No. VCU307987 (Cal. Super. Ct.)
<i>Brim, et al. v. Prestige Care, Inc.</i> , Case No. 3:24-CV-05133 (W.D. Wash.)
<i>Doe, et al. v. Virginia Mason Medical Center, et al.</i> , Case No. 19-2-26674-1 SEA (Wash. Super. Ct.)
<i>Velasco v. Belmont Groceries, LLC</i> , Case No. 2023-CH-01077 (Cir. Ct. Cook Cnty., Ill.)
<i>Newman, et al. v. Audienceview Ticketing Corporation, et al.</i> , Case No. 1:23-cv-03764 (S.D.N.Y.)
<i>Severa, et al. v. Solvay Specialty Polymers USA, LLC, et al.</i> , Case No. 1:20-CV-06906 (D.N.J.)
<i>In Re Christie's Data Breach Litigation</i> , Case No. 1:24-cv-4221 (S.D.N.Y.)
<i>Reardon, et al. v. Suncoast Skin Solutions, Inc.</i> , Case No. 23-CA-000317 (Fla. 13th Jud. Cir.)
<i>Kandel, et al. v. Dr. Dennis Gross Skincare LLC</i> , Case No. 1:23-cv-01967-ER (S.D.N.Y.)
Public School Districts' Opioid Recovery Trust
<i>Haggerty, et al. v. Consumer Safety Technology, LLC</i> , Case No. 22-cv-01414 (Cal. Super. Ct.)
<i>Guzman, et al. v. Polaris Industries, Inc. et al.</i> , Case No. 8:19-cv-01543 (C.D. Cal.)
<i>Coleman v. USAA</i> , Case No. 3:21-cv-217 (N.D. Cal.)
<i>Knott, et al. v. United Water System, Inc., et al.</i> , Case No. 6:23-CV-00401 (W.D. La.)
<i>Jweinat v. loanDepot.com, LLC</i> , Case No. CGC-23-605149 (Cal. Super. Ct.)
<i>Tracey, et al. v. Elekta, Inc., et al.</i> , Case No. 1:21-cv-02851 (N.D. Ga.)
<i>Coleman, et al. v. United Services Automobile Association, et al.</i> , Case No. 3:21-cv-00217 (S.D. Cal.)
<i>Ralph Milan, et al. v. Clif Bar & Company</i> , Case No. 18-cv-02354-JD (N.D. Cal.)
<i>In re: Valsartan N-Nitrosodimethylamine (NDMA) Products Liability Litigation</i> (non-settlement), Case No. 19-md-2875 (D.N.J.)
<i>Ayala v. Commonwealth Health Physician Network, et al.</i> , Case No. 2023-cv-3008 (Lackawanna Cnty. Ct. Com. Pl.)
<i>Andrade-Heymsfield v. NextFoods, Inc.</i> , Case No. 21-cv-1446 (S.D. Cal.)
<i>In Re: Novant Health, Inc.</i> , Case No. 1:22-cv-00697 (M.D.N.C.)
<i>White v. General Motors, LLC</i> , Case No. 1:21-cv-00410 (D. Colo.)
<i>Gunaratna v. Dennis Gross Skincare, LLC, et al.</i> , Case No. 2:20-cv-02311 (C.D. Cal.)
<i>Hymes v. Earl Enterprises Holdings</i> , Case No. 6:19-cv-00644 (M.D. Fla.)
<i>Rivera, et al. v. Google LLC</i> , Case No. 19-CH-00990 (Cir. Ct. Cook Cnty., Ill.)
<i>Hezi v Celsius Holdings, Inc</i> , Case No. 1:21-cv-09892 (S.D.N.Y.)
<i>M.S. v. Med-Data, Inc.</i> , Case No. 4:22-cv-00187 (S.D. Tex.)
<i>Ictech-Bendeck, et al. v. Progressive Waste Solutions of LA, Inc, et al.</i> , Case No. 2:18-cv-7889 (E.D. La.)
<i>Quackenbush, et al. v American Honda Motor Company, Inc., et al.</i> , Case No. 3:20-cv-05599 (N.D. Cal.)
<i>McFadden v. Nationstar</i> , Case No. 1:20-cv-00166 (D.D.C.)



<i>Sanders, et al. v. Ibex Global Solutions, Inc., et al.</i> , Case No. 1:22-cv-00591 (D.D.C.)
<i>In re: Cathode Ray Tube (CRT) Antitrust Litigation</i> , Case No. 4:07-cv-05944 (N.D. Cal.)
<i>John Doe, et al. v. Katherine Shaw Bethea Hospital and KSB Medical Group, Inc.</i> , Case No. 2021L00026 (15th Jud. Cir. Ct. Lee Cnty., Ill.)
<i>Gonshorowski v. Spencer Gifts, LLC</i> , Case No. ATL-L-000311-22 (N.J. Super. Ct.)
<i>In re Forefront Data Breach Litigation</i> , Case No. 1:21-cv-00887-LA (E.D. Wis.)
<i>Stewart, et al. v. Albertsons Cos., Inc.</i> , Case No. 16CV15125 (Mult. Cty. Cir. Ct.)
<i>Simmons v. Assistcare Home Health Services, LLC, d/b/a Preferred Home Health Care of New York/Preferred Gold</i> , Case No. 511490/2021 (N.Y. Sup. Ct. Kings Cnty.)
<i>Terry Fabricant v. Top Flite Financial, Inc.</i> , Case No. 20STCV13837 (Cal. Super.)
<i>Riley v. Centerstone of America</i> , Case No. 3:22-cv-00662 (M.D. Tenn.)
<i>Bae v. Pacific City Bank</i> , Case, No. 21STCV45922 (Cal. Super.)
<i>Tucker v. Marietta Area Health Care Inc.</i> , Case No. 2:22-cv-00184 (S.D. Ohio)
<i>Acaley v. Vimeo.com, Inc</i> , Case No. 19-CH-10873 (Cir. Ct. Cook Cnty., Ill.)
<i>Easter v Sound Generations</i> , Case No. 21-2-16953-4 (Wash. Super.)
<i>GPM v City of Los Angeles</i> , Case No. 21STCV11054 (Cal. Super.)
<i>Pagan v. Faneuil, Inc</i> , Case No. 3:22-cv-297 (E.D. Va.)
<i>Estes v. Dean Innovations, Inc.</i> , Case No. 20-CV-22946 (Mult. Cty. Cir. Ct.)
<i>Buck, et al. v. Northwest Commercial Real Estate Investments, LLC, et al.</i> , Case No. 21-2-03929-1 (Wash. Super.)
<i>Gilmore, et al. v. Monsanto Company, et al.</i> , Case No. 3:21-cv-8159 (N.D. Cal.)
<i>Copley v. Bactolac Pharmaceutical, Inc., et al.</i> , Case No. 2:18-cv-00575 (E.D.N.Y.)
<i>James v. CohnReznick LLP</i> , Case No. 1:21-cv-06544 (S.D.N.Y.)
<i>Doe v. Virginia Mason</i> , Case No. 19-2-26674-1 (Wash. Super.)
<i>LaPrairie v. Presidio, Inc., et al</i> , Case No. 1:21-cv-08795 (S.D.N.Y.)
<i>Richardson v. Overlake Hospital Medical Center, et al.</i> , Case No. 20-2-07460-8 (Wash. Super.)
<i>Weidman, et al. v. Ford Motor Company</i> , Case No. 2:18-cv-12719 (E.D. Mich.)
<i>Siqueiros, et al. v. General Motors, LLC</i> , Case No. 3:16-cv-07244 (N.D. Cal.)
<i>Vaccaro v. Delta Drugs, II. Inc.</i> , Case No. 20STCV28871 (Cal. Super.)
<i>Hosch v. Drybar Holdings LLC</i> , Case No. 2021-CH-01976 (Cir. Ct. Cook Cnty., Ill.)
<i>Davidson v. Healthgrades Operating Company, Inc.</i> , Case No. 21-cv-01250 (D. Colo.)
<i>Baldwin, et al. v. National Western Life Insurance Co.</i> , Case No. 2:21-cv-04066 (W.D. Mo.)
<i>Deien v. Seattle City Light</i> , Case No. 19-2-21999-8 (Wash. Super.)
<i>Blake Chapman, et al. v. voestalpine Texas, LLC, et al</i> , Case No. 2:17-cv-00174 (S.D. Tex.)
<i>Hanson v. Welch Foods Inc.</i> , Case No. 3:20-cv-02011 (N.D. Cal.)
<i>McMorrow v. Mondelez International, Inc.</i> , Case No. 3:17-cv-02327 (S.D. Cal.)
<i>Hadley, et al. v. Kellogg Sales Company</i> , Case No. 5:16-cv-04955 (N.D. Cal.)
<i>Miracle-Pond, et al. v. Shutterfly, Inc.</i> , Case No. 16-cv-10984 (Cir. Ct. Cook Cnty., Ill.)
<i>In Re: Sonic Corp. Customer Data Breach Litigation</i> , Case No. 1:17-md-02807 (N.D. Ohio)
<i>In re: Interior Molded Doors Indirect Purchaser Antitrust Litigation</i> , Case No. 3:18-cv-00850 (E.D. Va.)
<i>Krommenhock, et al. v. Post Foods, LLC</i> , Case No. 3:16-cv-04958 (N.D. Cal.)
<i>Daley, et al. v. Greystar Management Services LP, et al.</i> , Case No. 2:18-cv-00381 (E.D. Wash.)



<i>Brianna Morris v. FPI Management Inc.</i> , Case No. 2:19-cv-0128 (E.D. Wash.)
<i>Kirilose Mansour v. Bumble Trading Inc.</i> , Case No. RIC1810011 (Cal. Super.)
<i>Clopp et. al. v. Pacific Market Research, LLC et. al.</i> , Case No. 21-2-08738-4 (Wash. Super.)
<i>Lisa T. Leblanc, et al. v. Texas Brine Company, LLC, et al.</i> , Case No. 58410 (E.D. La.)
<i>Jackson-Battle v. Navicent Health, Inc.</i> , Case No. 2020-cv-072287 (Ga Super.)
<i>Fabricant v. Amerisave Mortgage Corp.</i> , Case No. 2:19-cv-04659 (C.D. Cal.)
<i>Jammeh v. HNN Assoc.</i> , Case No. 2:19-cv-00620 (W.D. Wash.)
<i>Farruggio, et al. v. 918 James Receiver, LLC, et al.</i> , Case No. 3831/2017 (N.Y. Sup Ct)
<i>Winters, et al. v. Two Towns Ciderhouse Inc.</i> , Case No. 3:20-cv-00468 (S.D. Cal.)
<i>Siddle, et al. v. The Duracell Company, et al.</i> , Case No. 4:19-cv-00568 (N.D. Cal.)
<i>Lisa Jones, et al. v. Monsanto Company</i> , Case No. 4:19-cv-00102 (W.D. Mo.)
<i>Makaron v. Enagic USA, Inc.</i> , Case No. 2:15-cv-05145 (C.D. Cal.)
<i>John Karpilovsky, et al. v. All Web Leads, Inc.</i> , Case No. 1:17-cv-01307 (N.D. Ill.)
<i>Hughes, et al. v. AutoZone Parts Inc., et al.</i> , Case No. BC631080 (Cal. Super.)
<i>Secaucus Investors LLC and Health Care Grower, LLC v. Harmony Foundation of New Jersey, Inc., et al.</i> , Case No. BER-C-275-21 (N.J. Sup Ct.)
<i>Miller, et al. v. P.S.C., Inc. d/b/a Puget Sound Collections</i> , Case No. 3:17-cv-0586 (W.D. Wash.)
<i>Aaron Van Fleet, et al. v. Trion Worlds Inc.</i> , Case No. 535340 (Cal. Super.)
<i>Wilmington Trust TCPA (Snyder, et al. v. U.S. Bank, N.A., et al.)</i> , Case No. 1:16-cv-11675 (N.D. Ill.)
<i>Deutsche Bank National Trust TCPA (Snyder, et al. v. U.S. Bank, N.A., et al.)</i> , Case No. 1:16-cv-11675 (N.D. Ill.)
<i>Adriana Garcia, et al. v. Sun West Mortgage Company, Inc.</i> , Case No. BC652939 (Cal. Super.)
<i>Cajuns for Clean Water, LLC, et al. v. Cecilia Water Corporation, et al.</i> , Case No. 82253 (La. Dist.)
<i>In re: Sony PS3 "Other OS" Litigation</i> , Case No. 4:10-cv-01811 (N.D. Cal.)
<i>In re: Ductile Iron Pipe Fittings Indirect Purchaser Antitrust Litigation</i> , Case No. 3:12-cv-00169 (D.N.J.)
<i>In re: Ductile Iron Pipe Fittings Direct Purchaser Antitrust Litigation</i> , Case No. 3:12-cv-00711 (D.N.J.)
<i>Hartig Drug Company Inc., v. Senju Pharmaceutical et al.</i> , Case No. 1:14-cv-00719 (D. Del.)
<i>Gordon v. The Hain Celestial Group, et al.</i> , Case No. 1:16-cv-06526 (S.D.N.Y.)
<i>In re: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico – Economic and Property Damages Settlement</i> , MDL No. 2179 (E.D. La.)
<i>In re: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico –Medical Benefits Settlement</i> , MDL No. 2179 (E.D. La.)
<i>Byrner et al. v. Oregon One, Inc.</i> , Case No. 3:16-cv-01910 (D. Or.)
<i>In re: Google Inc. Cookie Placement Consumer Privacy Litigation</i> , MDL No. 2358 (D. Del.)
<i>In re: Pool Products Distribution Market Antitrust Litigation</i> , MDL No. 2128 (E.D. La.)
<i>In re: Polyurethane Foam Antitrust Litigation</i> , MDL No. 2196 (N.D. Ohio)
<i>In re: Processed Egg Products Antitrust Litigation</i> , MDL No. 2002 (E.D. Pa.)
<i>In re: The Flintkote Company and Flintkote Mines Limited</i> , Case No. 1:04-bk-11300 (Bankr. D. Del.)
<i>In re: Prograf (Tacrolimus) Antitrust Litigation</i> , MDL No. 2242 (D. Mass.)
<i>Markos v. Wells Fargo Bank, N.A.</i> , Case No. 1:15-cv-01156 (N.D. Ga.)
<i>Cross v. Wells Fargo Bank, N.A.</i> , Case No. 1:15-cv-01270 (N.D. Ga.)
<i>Ferrick v. Spotify USA Inc.</i> , Case No. 1:16-cv-08412 (S.D.N.Y.)



<i>In re: Parmalat Securities Litigation</i> , MDL No. 1653 (S.D.N.Y.)
<i>Smith v. Floor and Décor Outlets of America, Inc.</i> , Case No. 1:15-cv-04316 (N.D. Ga.)
<i>Schwartz v. Intimacy in New York, LLC</i> , Case No. 1:13-cv-05735 (S.D.N.Y.)
<i>In re: TRS Recovery Services, Inc., Fair Debt Collection Practices Act Litigation</i> , MDL No. 2426 (D. Me.)
<i>Young v. Wells Fargo & Co</i> , Case No. 4:08-cv-00507 (S.D. Iowa)
<i>In re: Credit Default Swaps Antitrust Litigation</i> , MDL No. 2476 (S.D.N.Y.)
<i>Anthony Frank Lasseeter et al. v. Rite-Aid</i> , Case No. 09-cv-2013-900031 (Ala. Cir. Ct.)
<i>Khoday v. Symantec Corp.</i> , Case No. 0:11-cv-00180 (D. Minn.)
<i>MacKinnon, Jr v. IMVU</i> , Case No. 1-11-cv-193767 (Cal. Super.)
<i>Ebarle, et al. v. LifeLock, Inc.</i> , Case No. 3:15-cv-00258 (N.D. Cal.)
<i>Sanchez v. Kambousi Restaurant Partners ("Royal Coach Diner")</i> , Case No. 1:15-cv-05880 (S.D.N.Y.)
<i>Schwartz v. Avis Rent A Car System</i> , Case No. 2:11-cv-04052 (D.N.J.)
<i>Klein v. Budget Rent A Car System</i> , Case No. 2:12-cv-07300 (D.N.J.)
<i>Pietrantonio v. Kmart Corporation</i> , Case No. 15-5292 (Mass. Cmmw.)
<i>Cox, et al. v. Community Loans of America, Inc., et al.</i> , Case No. 4:11-cv-00177 (M.D. Ga.)
<i>Vodenichar. et al. v. Halcón Energy Properties, Inc., et al.</i> , Case No. 2013-512 (Pa. Com. Pleas)
<i>State of Oregon, ex. rel. Ellen F. Rosenblum, Attorney General v. AU Optronics Corporation, et al.</i> , Case No. 1208 10246 (Or. Cir.)
<i>Barr v. The Harvard Drug Group, LLC, d/b/a Expert-Med</i> , Case No. 0:13-cv-62019 (S.D. Fla.)
<i>Splater, et al. v. Thermal Ease Hydronic Systems, Inc., et al.</i> , Case No. 03-2-33553-3 (Wash. Super.)
<i>Phillips v. Bank of America</i> , Case No. 15-cv-00598 (Cal. Super.)
<i>Ziwczyzn v. Regions Bank and American Security Insurance Co.</i> , Case No. 1:15-cv-24558 (S.D. Fla)
<i>Dorado vs. Bank of America, N.A.</i> , Case No. 1:16-cv-21147 (S.D. Fla)
<i>Glass v. Black Warrior Electric</i> , Case No. cv-2014-900163 (Ala. Cir.)
<i>Beck v. Harbor Freight Tools USA, Inc.</i> , Case No. 15-cv-00598 (Ohio Com. Pleas)
<i>Ligon v. City of New York, et al.</i> , Case No. 12-cv-2274 (S.D.N.Y.)
<i>Abdellahi, et al., vs. River Metals Recycling, LLC</i> , Case No. 13-CI00095 (Ky. Cir.)
<i>Alegre v. XPO Last Mile, Inc.</i> , Case No. 2:15-cv-02342 (D.N.J.)
<i>Jack Leach, et al. v. E.I. du Pont de Nemours and Co.</i> , Case No. 01-C-608 (W. Va. Cir.)
<i>Hayes, et al. v. Citizens Financial Group Inc., et al.</i> , Case No. 1:16-cv-10671 (D. Mass.)
<i>In re: Foreign Exchange Benchmark Rates Antitrust Litigation</i> , Case No. 1:13-cv-07789 (S.D.N.Y.)
<i>Flo & Eddie, Inc. v. Sirius XM Radio, Inc.</i> , Case No. 2:13-cv-05693 (C.D. Cal.)
<i>Cozzitorto vs. American Automobile Association of Northern California, Nevada & Utah</i> , Case No. C13-02656 (Cal. Super.)
<i>Filannino-Restifo, et al. v. TD Bank, N.A.</i> , Case No. 0:18-cv-01159 (D.N.J.)
<i>United States v. Takata Corporation</i> , Case No. 2:16-cv-20810 (E.D. Mich.)
<i>Free Range Content, Inc. v. Google Inc.</i> , Case No. 5:14-cv-02329 (N.D. Cal.)
<i>Bautista v. Valero Marketing and Supply Company</i> , Case No. 3:15-cv-05557 (N.D. Cal.)
<i>Devin Forbes and Steve Lagace -and- Toyota Canada Inc.</i> , Case No. cv-16-70667 (Ont. Super. Ct.)
<i>Thierry Muraton -and- Toyota Canada Inc.</i> , Case No. 500-06-000825-162 (Que. Super. Ct.)
<i>In re: Residential Schools Class Action Litigation</i> , Case No. 00-cv-192059 (Ont. Super. Ct.)
<i>In re: Tricor Antitrust Litigation</i> , Case No. 05-340 (D. Del.)



<i>Masztal v. City of Miami</i> , Case No. 3D06-1259 (Fla. Dist. App.)
<i>In re: Tribune Company, et al.</i> , Case No. 08-13141 (D. Del.)
<i>Marian Perez v. Tween Brands Inc.</i> , Case No. 14-cv-001119 (Ohio Com. Pleas)
<i>Ferguson v. Safeco</i> , Case No. DV 04-628B (Mont. Dist.)
<i>Williams v. Duke Energy</i> , Case No. 1:08-cv-00046 (S.D. Ohio)
<i>Boone v. City of Philadelphia</i> , Case No. 2:05-cv-01851 (E.D. Pa.)
<i>In re: Lehman Brothers Inc.</i> , Case No. 08-13555, 08-01420 (Bankr. S.D.N.Y.)
<i>In re: Department of Veterans Affairs (VA) Data Theft Litigation</i> , MDL No. 1796 (D.D.C.)
<i>In re: Countrywide Customer Data Breach Litigation</i> , MDL No. 1998 (W.D. Ky.)
<i>In re: Checking Account Overdraft Litigation</i> , MDL No. 2036 (S.D. Fla.)
<i>In re: Heartland Data Security Breach Litigation</i> , MDL No. 2046 (S.D. Tex.)
<i>Schulte v. Fifth Third Bank</i> , Case No. 1:09-cv-06655 (N.D. Ill.)
<i>Mathena v. Webster Bank, N.A.</i> , Case No. 3:10-cv-01448 (D. Conn.)
<i>Delandro v. County of Allegheny</i> , Case No. 2:06-cv-00927 (W.D. Pa.)
<i>Trombley v. National City Bank</i> , Case No. 1:10-cv-00232 (D.D.C.)
<i>Fontaine v. Attorney General of Canada</i> , Case No. 00-cv-192059 CP (Ont. Super. Ct.)
<i>Marolda v. Symantec Corp.</i> , Case No. 3:08-cv-05701 (N.D. Cal.)





Class & Mass Action Settlement Administration

Our Approach

EisnerAmper provides pre-settlement consulting and post-settlement administration services in connection with lawsuits pending in state and federal courts nationwide. Since 1999, EisnerAmper professionals have processed more than \$14 billion dollars in settlement claims. Our innovative team successfully administers a wide variety of settlements, and our industry-leading technology enables us to develop customizable administration solutions for class and mass action litigations.

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Sample Case Experience*



Environmental/Toxic Torts

- In re: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico (MDL 2179)
- Aqueous Film-Forming Foam (AFFF) Product Liability Litigation (MDL 2873) - Public Water System Settlement
- In re: FEMA Trailer Formaldehyde Products Liability Litigation (MDL 1873)
- Sanchez et al v. Texas Brine, LLC et al.
- Burmaster et al. v. Plaquemines Parish Government, et al.
- Cajuns for Clean Water, LLC et al. v. Cecilia Water Corporation, et al.
- Cooper, et al. v. Louisiana Department of Public Works
- Maturin v. Bayou Teche Water Works
- Chevron Richmond Refinery Fire Settlement
- Chapman et al. v. voestalpine Texas LLC, et al.



Consumer

- Jones et al. v. Monsanto Co.
- Hadley, et al. v. Kellogg Sales Co.
- McMorrow, et al. v. Mondelez International, Inc
- Krommenhock, et al. v. Post Foods, LLC
- Hanson v. Welch Foods Inc.
- Siddle et al. v. The Duracell Co. et al.
- Copley, et al. v. Bactolac Pharmaceutical, Inc.
- Hughes et al. v. AutoZone Parts Inc. et al.
- Winters v. Two Towns Ciderhouse, Inc.
- Burford et al. v. Cargill, Incorporated
- Fabricant v. AmeriSave Mortgage Corp. (TCPA)
- Makaron v. Enagic USA, Inc. (TCPA)
- Prescod et al. v. Celsius Holdings, Inc.
- Gilmore v. Monsanto Co.



Antitrust

- In re: Cathode Ray Tube (CRT) Antitrust Litigation (MDL 1917)⁴
- In re: Interior Molded Doors Antitrust Litigation (Indirect)



Mass Torts

- In re: E.I. du Pont de Nemours and Company C8 Personal Injury Litigation (MDL 2433)¹
- In re: Testosterone Replacement Therapy Products Liability Litigation (MDL 2545)¹
- In re: Paraquat Products Liability Litigation (MDL 3004)¹
- In re: Paragard Products Liability Litigation (MDL 2974)
- In re: Roundup Products Liability Litigation (MDL 2741)²
- Essure Product Liability Settlement³
- Porter Ranch (JCCP 4861)



Data Breach/Privacy

- Miracle-Pond, et al. v. Shutterfly
- Baldwin et al. v. National Western Life Insurance Co.
- Jackson-Battle, et al. v. Navicent Health, Inc.
- Bailey, et al. v. Grays Harbor County Public Hospital No. 2
- In re: Forefront Data Breach Litigation
- Easter et al. v. Sound Generations
- Rivera, et al. v. Google LLC
- Acaley v. Vimeo, Inc.



Mass Arbitration

- T-Mobile
- Uber
- Postmates
- Instacart
- Intuit



Other Notable Cases

- Brown, et al. v. State of New Jersey DOC (Civil Rights)
- Slade v. Progressive (Insurance)

**Work performed as Postlethwaite & Netterville, APAC (P&N)*

¹Services provided in cooperation with the Court-Appointed Special Master

²Appointed As Common Benefit Trustee

³Inventory Settlement

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EAG Claims Administration Experience

SAMPLE JUDICIAL COMMENTS

- **Hezi v. Celsius Holdings, Inc.**, No. 1:21-CV-09892-VM (S.D.N.Y.), Judge Jennifer H. Rearden on April 5, 2023:

The Court finds and determines that the notice procedure carried out by Claims Administrator Postlethwaite & Netterville, APAC ("P&N") afforded adequate protections to Class Members and provides the basis for the Court to make an informed decision regarding approval of the Settlement based on the responses of Class Members. The Court finds and determines that the Notice was the best notice practicable, and has satisfied the requirements of law and due process .

- **Scott Gilmore et al. v. Monsanto Company, et al.**, No. 3:21-CV-8159 (N.D. Cal.), Judge Vince Chhabria on March 31, 2023:

The Court finds that Class Notice has been disseminated to the Class in compliance with the Court's Preliminary Approval Order and the Notice Plan. The Court further finds that this provided the best notice to the Class practicable under the circumstances, fully satisfied due process, met the requirements of Rule 23 of the Federal Rules of Civil Procedure, and complied with all other applicable law.

- **John Doe et al. v. Katherine Shaw Bethea Hospital and KSB Medical Group, Inc.**, No. 2021L00026 (Fifteenth Judicial Circuit of Illinois, Lee County), on March 28, 2023:

The Court has determined that the Notice given to the Settlement Class Members, in accordance with the Preliminary Approval Order, fully and accurately informed Settlement Class Members of all material elements of the Settlement and constituted the best notice practicable under the circumstances, and fully satisfied the requirements of 735 ILCS 5/2-803, applicable law, and the Due Process Clauses of the U.S. Constitution and Illinois Constitution.

- **Sanders et al. v. Ibex Global Solutions, Inc. et al.**, No. 1:22-CV-00591 (D.D.C.), Judge Trevor N. McFadden on March 10, 2023:

An affidavit or declaration of the Settlement Administrator's compliance with the Notice process has been filed with the Court. The Notice process as set forth in the Settlement Agreement and ordered in the Preliminary Approval Order constitutes the best notice practicable under the circumstances and constitutes valid, due, and sufficient notice to all Class Members in accordance with the requirements of Federal Rule of Civil Procedure 23(c)(2).

- **Vaccaro v. Super Care, Inc.,** No. 20STCV03833 (Cal. Superior Court), Judge David S. Cunningham on March 10, 2023:

The Class Notice provided to the Settlement Class conforms with the requirements of California Code of Civil Procedure § 382, the California and United States Constitutions, and any other applicable law, and constitutes the best notice practicable under the circumstances, by providing individual notice to all Class Members who could be identified through reasonable effort, and by providing due and adequate notice of the proceedings and of the matters set forth therein to the other Class Members. The notice fully satisfied the requirements of Due Process.

- **Gonshorowski v. Spencer Gifts, LLC,** No. ATL-L-000311-22 (N.J. Super. Ct.), Judge Danielle Walcoff on March 3, 2023:

The Court finds that the Notice issued to the Settlement Class, as ordered in the Amended Preliminary Approval Order, constitutes the best possible notice practicable under the circumstances and constitutes valid, due, and sufficient notice to all Settlement Class Members in compliance with New Jersey Court Rules 4:32-2(b)(2) and (e)(1)(B) and due process.

- **Vaccaro v. Delta Drugs II, Inc.,** No. 20STCV28871 (Cal. Superior Court), Judge Elihu M. Berle on March 2, 2023:

The Class Notice provided to the Settlement Class conforms with the requirements of California Code of Civil Procedure § 382, the California and United States Constitutions, and any other applicable law, and constitutes the best notice practicable under the circumstances, by providing individual notice to all Class Members who could be identified through reasonable effort, and by providing due and adequate notice of the proceedings and of the matters set forth therein to the other Class Members. The notice fully satisfied the requirements of Due Process.

- **Pagan, et al. v. Faneuil, Inc.,** No. 3:22-CV-297 (E.D. Va), Judge Robert E. Payne on February 16, 2023:

The Court finds that the Notice Program, set forth in the Settlement Agreement and effectuated pursuant to the Preliminary Approval Order, was the best notice practicable under the circumstances, was reasonably calculated to provide and did provide due and sufficient notice to the Settlement Class of the pendency of the Action, certification of the Settlement Class for settlement purposes only, the existence and terms of the Settlement Agreement, and their right to object and to appear at the final approval hearing or to exclude themselves from the Settlement Agreement, and satisfied the requirements of the Federal Rules of Civil Procedure, the United States Constitution, and other applicable law.



- **LaPrairie v. Presidio, Inc., et al.**, No. 1:21-CV-08795-JFK (S.D.N.Y.), Judge Andrew L. Carter, Jr. on December 12, 2022:

The Court hereby fully, finally and unconditionally approves the Settlement embodied in the Settlement Agreement as being a fair, reasonable and adequate settlement and compromise of the claims asserted in the Action. The Class Members have been given proper and adequate notice of the Settlement, fairness hearing, Class Counsel's application for attorneys' fees, and the service award to the Settlement Class Representative. An affidavit or declaration of the Settlement Administrator's compliance with the Notice process has been filed with the Court. The Notice process as set forth in the Settlement Agreement and ordered in the Preliminary Approval Order constitutes the best notice practicable under the circumstances and constitutes valid, due, and sufficient notice to all Class Members in accordance with the requirements of Federal Rule of Civil Procedure 23(c)(2).

- **Nelson v. Bansley & Kiener, LLP**, No. 2021-CH-06274 (Circuit Court of Cook County, IL), Judge Sophia H. Hall on November 30, 2022:

The court finds that such Notice as therein ordered, constitutes the best possible notice practicable under the circumstances and constitutes valid, due, and sufficient notice to all Settlement Class Members in compliance with requirements of 735 ILCS 5/2-801, et seq.

- **Buck, et al. v. Northwest Commercial Real Estate Investments, LLC, et al.**, No. 21-2-03929-1-SEA (Superior Court King County, WA), Judge Douglass A. North on September 30, 2022:

Pursuant to the Court's Preliminary Approval Order, Postcard Notice was distributed to the Class by First Class mail and Email Notice was distributed to all Class Members for whom the Settlement Administrator had a valid email address. The Court hereby finds and concludes that Postcard and Email Notice was disseminated to members of the Settlement Class in accordance with the terms set forth in the Settlement and in compliance with the Court's Preliminary Approval Order. The Court further finds and concludes that the Postcard and Email Notice, and the distribution procedures set forth in the Settlement fully satisfy CR 23(c)(2) and the requirements of due process, were the best notice practicable under the circumstances, provided individual notice to all members of the Class who could be identified through reasonable effort, provided an opportunity for the Class Members to object or exclude themselves from the Settlement, and support the Court's exercise of jurisdiction over the Settlement Class Members as contemplated in the Settlement and this Final Approval Order.



- **Rivera, et al. v. Google LLC**, No. 2019-CH-00990 (Circuit Court of Cook County, IL), Judge Anna M. Loftus on September 28, 2022:

Pursuant to this Court's Order granting preliminary approval of the Settlement, Postlethwaite & Netterville, APAC ("P&N") served as Settlement Administrator. This Court finds that the Settlement Administrator performed all duties thus far required as set forth in the Settlement Agreement.

The Court finds that the Settlement Administrator has complied with the approved notice process as confirmed by its Declaration filed with the Court. The Court further finds that the Notice plan set forth in the Settlement as executed by the Settlement Administrator satisfied the requirements of Due Process and 735 ILCS 5/2-803. The Notice plan was reasonably calculated and constituted the best notice practicable to apprise Settlement Class Members of the nature of this litigation, the scope of the Settlement Class, the terms of the Settlement, the right of Settlement Class Members to object to the Settlement or exclude themselves from the Settlement Class and the process for doing so, and of the Final Approval Hearing. Accordingly, the Court finds and concludes that the Settlement Class Members have been provided the best notice practicable under the circumstances, and that the Notice plan was clearly designed to advise the Settlement Class Members of their rights.

- **Davonna James, individually and on behalf of all others similarly situated v. CohnReznick LLP**, No. 1:21-cv-06544 (S.D.N.Y.), Judge Lewis J. Liman on September 21, 2022:

The Court finds that such Notice as therein ordered, constitutes the best possible notice practicable under the circumstances and constitutes valid, due, and sufficient notice to all Settlement Class Members in compliance with the requirements of Federal Rule of Civil Procedure 23(c)(2).

- **Patricia Davidson, et al. v. Healthgrades Operating Company, Inc.**, No. 21-cv-01250-RBJ (D. Colo), Judge R. Brooke Jackson on August 22, 2022:

The Court finds that such Notice as therein ordered, constitutes the best possible notice practicable under the circumstances and constitutes valid, due, and sufficient notice to all Settlement Class Members in compliance with the requirements of Federal Rule of Civil Procedure 23(c)(2).

- **Hosch et al. v. Drybar Holdings LLC**, No. 2021-CH-01976 (Circuit Court of Cook County, IL), Judge Pamela M. Meyerson on June 27, 2022:

The Court has determined that the Notice given to the Settlement Class Members, in accordance with the Preliminary Approval Order, fully and accurately informed



Settlement Class Members of all material elements of the Settlement and constituted the best notice practicable under the circumstances, and fully satisfied the requirements of 735 ILCS 5/2-803, applicable law, and the Due Process Clauses of the U.S. Constitution and Illinois Constitution.

- **Baldwin et al. v. National Western Life Insurance Company**, No. 2:21-cv-04066-WJE (W.D. MO), Judge Willie J. Epps, Jr. on June 16, 2022:

The Court finds that such Notice as therein ordered, constituted the best possible notice practicable under the circumstances and constitutes valid, due, and sufficient notice to all Settlement Class Members in compliance with the requirements of Rule 23(c)(2).

- **Chapman et al. v. voestalpine Texas Holding LLC**, No. 2:17-cv-174 (S.D. Tex.), Judge Nelva Gonzales Ramos on June 15, 2022:

The Class and Collective Notice provided pursuant to the Agreement and the Order Granting Preliminary Approval of Class Settlement:

- (a) *Constituted the best practicable notice, under the circumstances;*
 - (b) *Constituted notice that was reasonably calculated to apprise the Class Members of the pendency of this lawsuit, their right to object or exclude themselves from the proposed settlement, and to appear at the Fairness Hearing;*
 - (c) *Was reasonable and constituted due, adequate, and sufficient notice to all persons entitled to receive notice; and*
 - (d) *Met all applicable requirements of the Federal Rules of Civil Procedure and the Due Process Clause of the United States Constitution because it stated in plain, easily understood language the nature of the action; the definition of the class certified; the class claims, issues, or defenses; that a class member may enter an appearance through an attorney if the member so desires; that the court will exclude from the class any member who requests exclusion; the time and manner for requesting exclusion; and the binding effect of a class judgment on members under Rule 23(c)(3).*
- **Clopp et al. v. Pacific Market Research LLC**, No. 21-2-08738-4 (Superior Court King County, WA), Judge Kristin Richardson on May 27, 2022:

The Court finds that such Notice as therein ordered, constitutes the best possible notice practicable under the circumstances and constitutes valid, due, and sufficient notice to all Settlement Class Members in compliance with the requirements of Washington Civil Rule 23(c)(2).



- **Whitlock v. Christian Homes, Inc., et al**, No. 2020L6 (Circuit Court of Logan County, IL), Judge Jonathan Wright on May 6, 2022:

The Court has determined that the Notice given to the Settlement Class Members, in accordance with the Preliminary Approval Order, fully and accurately informed Settlement Class Members of all material elements of the Settlement and constituted the best notice practicable under the circumstances, and fully satisfied the requirements of 735 ILCS 5/2-803, applicable law, and the Due Process Clauses of the U.S. Constitution and Illinois Constitution.

- **Hanson v. Welch Foods Inc.**, No. 3:20-cv-02011-JCS (N.D. Cal.), Judge Joseph C. Spero on April 15, 2022:

The Class Notice and claims submission procedures set forth in Sections 5 and 9 of the Settlement Agreement, and the Notice Plan detailed in the Declaration of Brandon Schwartz filed on October 1, 2021, fully satisfy Rule 23 of the Federal Rules of Civil Procedure and the requirements of due process, were the best notice practicable under the circumstances, provided individual notice to all Settlement Class Members who could be identified through reasonable effort, and support the Court's exercise of jurisdiction over the Settlement Class as contemplated in the Settlement Agreement and this Order. See Fed. R. Civ. P. 23(e)(2)(C)(ii).

- **Dein v. Seattle City Light**, No. 19-2-21999-8 SEA (Superior Court King County, WA), Judge Kristin Richardson on April 15, 2022:

The Court hereby finds and concludes that the notice was disseminated to Settlement Class Members in accordance with the terms set forth in the Settlement and in compliance with the Court's Preliminary Approval Order. The Court further finds and concludes that the notice fully satisfies CR 23(c)(2) and the requirements of due process, was the best notice practicable under the circumstances, provided individual notice to all members of the Class who could be identified through reasonable effort, and provided an opportunity for the Class Members to object to or exclude themselves from the Settlement.

- **Frank v. Cannabis & Glass, LLC, et al**, No. 19-cv-00250 (E.D. Wash.), Judge Stanley A. Bastian on April 11, 2022:

Postlethwaite & Netterville, APAC, ("P&N"), the Settlement Administrator approved by the Court, completed the delivery of Class Notice according to the terms of the Agreement. The Class Text Message Notice given by the Settlement Administrator to the Settlement Class, which set forth the principal terms of the Agreement and other matters, was the best practicable notice under the circumstances, including



individual notice to all Settlement Class Members who could be identified through reasonable effort.

- **McMorrow, et al. v. Mondelez International, Inc.**, No. 17-cv-02327 (S.D. Cal.), Judge Cynthia Bashant on April 8, 2022:

Notice was administered nationwide and achieved an overwhelmingly positive outcome, surpassing estimates from the Claims Administrator both in the predicted reach of the notice (72.94% as compared to 70%) as well as in participation from the class (80% more claims submitted than expected). (Schwartz Decl. ¶ 14, ECF No. 206-1; Final App. Mot. 3.) Only 46 potential Class Members submitted exclusions (Schwartz Decl. ¶ 21), and only one submitted an objection—however the objection opposes the distribution of fees and costs rather than the settlement itself. (Obj. 3.) The Court agrees with Plaintiffs that the strong claims rate, single fee-related objection, and low opt-out rate weigh in favor of final approval.

- **Daley, et al. v. Greystar Management Services LP, et al.**, No. 2:18-cv-00381 (E.D. Wash.), Judge Salvador Mendoz, Jr. on February 1, 2022:

The Settlement Administrator completed the delivery of Class Notice according to the terms of the Agreement. The Class Notice given by the Settlement Administrator to the Settlement Class....was the best practicable notice under the circumstances. The Class Notice program....was reasonable and provided due and adequate notice of these proceedings and of the matters set forth therein, including the terms of the Agreement, to all parties entitled to such notice. The Class Notice given to the Settlement Class Members satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure and the requirements of constitutional due process. The Class Notice was reasonably calculated under the circumstances to apprise Settlement Class Members of the pendency of this Action....

- **Mansour, et al. v. Bumble Trading, Inc.**, No. RIC1810011 (Cal. Super.), Judge Sunshine Sykes on January 27, 2022:

The Court finds that the Class Notice and the manner of its dissemination constituted the best practicable notice under the circumstances and was reasonably calculated, under all the circumstances, to apprise Settlement Class Members of the pendency of the Litigation, the terms of the Agreement, and their right to object to or exclude themselves from the Settlement Class. The Court finds that the notice was reasonable, that it constituted due, adequate and sufficient notice to all persons entitled to receive notice, and that it met the requirements of due process, Rules of Court 3.766 and 3.769(f), and any other applicable laws.



- **Hadley, et al. v. Kellogg Sales Company**, No. 16-cv-04955 (N.D. Cal.), Judge Lucy H. Koh on November 23, 2021:

The Class Notice and claims submission procedures set forth in Sections 4 and 6 of the Settlement Agreement, and the Notice Plan filed on March 10, 2021, fully satisfy Rule 23 of the Federal Rules of Civil Procedure and the requirements of due process, were the best notice practicable under the circumstances, provided individual notice to all Settlement Class Members who could be identified through reasonable effort, and support the Court's exercise of jurisdiction over the Settlement Classes as contemplated in the Settlement Agreement and this Order. See Fed. R. Civ. P. 23(e)(2)(C)(ii).

- **Miracle-Pond, et al. v. Shutterfly, Inc.**, No. 2019-CH-07050 (Circuit Court of Cook County, IL), Judge Raymond W. Mitchell on September 9, 2021:

This Court finds that the Settlement Administrator performed all duties thus far required as set forth in the Settlement Agreement. The Court finds that the Settlement Administrator has complied with the approved notice process as confirmed by its Declaration filed with the Court. The Court further finds that the Notice plan set forth in the Settlement as executed by the Settlement Administrator satisfied the requirements of Due Process and 735 ILCS 5/2-803. The Notice plan was reasonably calculated and constituted the best notice practicable to apprise Settlement Class Members of the nature of this litigation, the scope of the Settlement Class, the terms of the Settlement, the right of Settlement Class Members to object to the Settlement or exclude themselves from the Settlement Class and the process for doing so, and of the Final Approval Hearing. Accordingly, the Court finds and concludes that the Settlement Class Members have been provided the best notice practicable under the circumstances, and that the Notice plan was clearly designed to advise the Settlement Class Members of their rights.

- **Jackson-Battle, et al. v. Navicent Health, Inc.**, No. 2020-CV-072287 (Ga Super.), Judge Jeffery O. Monroe on August 4, 2021:

The Court finds that such Notice as therein ordered, constitutes the best possible notice practicable under the circumstances and constitutes valid, due, and sufficient notice to all Settlement Class Members in compliance with the requirements of O.C.G.A. §§ 9-11-23(c)(2).

- **In re: Interior Molded Doors Indirect Purchasers Antitrust Litigation**, No. 3:18-cv-00850 (E.D. Va.), Judge John A. Gibney on July 27, 2021:

The notice given to the Settlement Class of the settlement set forth in the Settlement Agreement and the other matters set forth herein was the best notice practicable



under the circumstances. Said notice provided due and adequate notice of the proceedings an of the matters set forth therein, including the proposed settlement set forth in the Settlement Agreement, to all persons and entities entitled to such notice, and said notice fully satisfied the requirements of Rules 23(c)(2) and 23(e) and the requirements of due process.

- **Krommenhock, et al. v. Post Foods, LLC**, No. 16-cv-04958 (N.D. Cal.), Judge William H. Orrick on June 25, 2021:

The Class Notice and claims submission procedures set forth in Sections 4 and 6 of the Settlement Agreement and the Notice Plan filed on January 18, 2021 fully satisfy Rule 23 of the Federal Rules of Civil Procedure and the requirements of due process, were the best notice practicable under the circumstances, provided individual notice to all Settlement Class Members who could be identified through reasonable effort, and support the Court's exercise of jurisdiction over the Settlement Classes as contemplated in the Settlement Agreement and this Order. See Fed. R. Civ. P. 23(e)(2)(C)(ii).

- **Winters, et al. v. Two Towns Ciderhouse, Inc.**, No. 20-cv-00468 (S.D. Cal.), Judge Cynthia Bashant on May 11, 2021:

The settlement administrator, Postlethwaite and Netterville, APAC ("P&N") completed notice as directed by the Court in its Order Granting Preliminary Approval of the Class Action Settlement. (Decl. of Brandon Schwartz Re: Notice Plan Implementation and Settlement Administration ("Schwartz Decl.") ¶¶ 4–14, ECF No. 24-5.)...Thus, the Court finds the Notice complies with due process....With respect to the reaction of the class, it appears the class members' response has been overwhelmingly positive.

- **Siddle, et al. v. The Duracell Company, et al.**, No. 4:19-cv-00568 (N.D. Cal.), Judge James Donato on April 19, 2021:

The Court finds that the Class Notice and Claims Administration procedures set forth in the Agreement fully satisfy Rule 23 of the Federal Rules of Civil Procedure and the requirements of due process, were the best notice practicable under the circumstances, provided due and sufficient individual notice to all persons in the Settlement Class who could be identified through reasonable effort, and support the Court's exercise of jurisdiction over the Settlement Class as contemplated in the Agreement and this Final Approval Order.



- ***Fabricant v. Amerisave Mortgage Corporation***, No. 19-cv-04659-AB-AS (C.D. Cal.), Judge Andre Birotte, Jr. on November 25, 2020:

The Class Notice provided to the Settlement Class conforms with the requirements of Fed. Rule Civ. Proc. 23, the California and United States Constitutions, and any other applicable law, and constitutes the best notice practicable under the circumstances, by providing individual notice to all Settlement Class Members who could be identified through reasonable effort, and by providing due and adequate notice of the proceedings and of the matters set forth therein to the other Settlement Class Members. The notice fully satisfied the requirements of Due Process. No Settlement Class Members have objected to the terms of the Settlement.

- ***Snyder, et al. v. U.S. Bank, N.A., et al.***, No. 1:16-CV-11675 (N.D. Ill), Judge Matthew F. Kennelly on June 18, 2020:

The Court makes the following findings and conclusions regarding notice to the Settlement Class:

a. The Class Notice was disseminated to persons in the Settlement Class in accordance with the terms of the Settlement Agreement and the Class Notice and its dissemination were in compliance with the Court's Preliminary Approval Order;
b. The Class Notice: (i) constituted the best practicable notice under the circumstances to potential Settlement Class Members, (ii) constituted notice that was reasonably calculated, under the circumstances, to apprise Settlement Class Members of the pendency of the Consolidated Litigation, their right to object or to exclude themselves from the proposed Settlement, and their right to appear at the Final Approval Hearing, (iii) was reasonable and constituted due, adequate, and sufficient individual notice to all persons entitled to be provided with notice, and (iv) complied fully with the requirements of Fed. R. Civ. P. 23, the United States Constitution, the Rules of this Court, and any other applicable law.

- ***Edward Makaron et al. v. Enagic USA, Inc.***, No. 2:15-cv-05145 (C.D. Cal.), Judge Dean D. Pregerson on January 16, 2020:

The Court makes the following findings and conclusions regarding notice to the Class:

a. The Class Notice was disseminated to persons in the Class in accordance with the terms of the Settlement Agreement and the Class Notice and its dissemination were in compliance with the Court's Preliminary Approval Order;
b. The Class Notice: (i) constituted the best practicable notice under the circumstances to potential Class Members, (ii) constituted notice that was reasonably



calculated, under the circumstances, to apprise Class Members of the pendency of the Action, their right to object or to exclude themselves from the proposed Settlement, and their right to appear at the Final Approval Hearing, (iii) was reasonable and constituted due, adequate, and sufficient individual notice to all persons entitled to be provided with notice, and (iv) complied fully with the requirements of Fed. R. Civ. P. 23, the United States Constitution, the Rules of this Court, and any other applicable law.

- **Kimberly Miller et al. v. P.S.C, Inc., d/b/a Puget Sound Collections**, No. 3:17-cv-05864 (W. D. Wash.), Judge Ronald B. Leighton on January 10, 2020:

The Court finds that the notice given to Class Members pursuant to the terms of the Agreement fully and accurately informed Class Members of all material elements of the settlement and constituted valid, sufficient, and due notice to all Class Members. The notice fully complied with due process, Rule 23 of the Federal Rules of Civil Procedure, and all other applicable law.

- **John Karpilovsky and Jimmie Criollo, Jr. et al. v. All Web Leads, Inc.**, No. 1:17-cv-01307 (N.D. Ill), Judge Harry D. Leinenweber on August 8, 2019:

The Court hereby finds and concludes that Class Notice was disseminated to members of the Settlement Class in accordance with the terms set forth in the Settlement Agreement and that Class Notice and its dissemination were in compliance with this Court's Preliminary Approval Order.

The Court further finds and concludes that the Class Notice and claims submission procedures set forth in the Settlement Agreement fully satisfy Rule 23 of the Federal Rules of Civil Procedure and the requirements of due process, were the best notice practicable under the circumstances, provided individual notice to all Settlement Class Members who could be identified through reasonable effort, and support the Court's exercise of jurisdiction over the Settlement Class as contemplated in the Settlement and this Order.

- **Paul Story v. Mammoth Mountain Ski Area, LLC**, No. 2:14-cv-02422 (E.D. Cal.), Judge John A. Mendez on March 13, 2018:

The Court finds that the Settlement Administrator delivered the Class Notice to the Class following the procedures set forth in the Settlement Agreement; that the Class Notice and the procedures followed by the Settlement Administrator constituted the best notice practicable under the circumstances; and that the Class Notice and the procedures contemplated by the Settlement Agreement were in full compliance with the laws of the United States and the requirements of due process. These findings support final approval of the Settlement Agreement.



- **John Burford, et al. v. Cargill, Incorporated**, No. 05-0283 (W.D. La.), Judge S. Maurice Hicks, Jr. on November 8, 2012:

Considering the aforementioned Declarations of Carpenter and Mire as well as the additional arguments made in the Joint Motion and during the Fairness Hearing, the Court finds that the notice procedures employed in this case satisfied all of the Rule 23 requirements and due process.

- **In RE: FEMA Trailer Formaldehyde Product Liability Litigation**, MDL No. 1873, (E.D La.), Judge Kurt D. Engelhardt on September 27, 2012:

After completing the necessary rigorous analysis, including careful consideration of Mr. Henderson's Declaration and Mr. Balhoff's Declaration, along with the Declaration of Justin I. Woods, the Court finds that the first-class mail notice to the List of Potential Class Members (or to their attorneys, if known by the PSC), Publication Notice and distribution of the notice in accordance with the Settlement Notice Plan, the terms of the Settlement Agreement, and this Court's Preliminary Approval Order:

- (a) constituted the best practicable notice to Class Members under the circumstances;*
- (b) provided Class Members with adequate instructions and a variety of means to obtain information pertaining to their rights and obligations under the settlement so that a full opportunity has been afforded to Class Members and all other persons wishing to be heard;*
- (c) was reasonably calculated, under the circumstances, to apprise Class Members of: (i) the pendency of this proposed class action settlement, (ii) their right to exclude themselves from the Class and the proposed settlement, (iii) their right to object to any aspect of the proposed settlement (including final certification of the settlement class, the fairness, reasonableness or adequacy of the proposed settlement, the adequacy of representation by Plaintiffs or the PSC, and/or the award of attorneys' fees), (iv) their right to appear at the Fairness Hearing - either on their own or through counsel hired at their own expense - if they did not exclude themselves from the Class, and (v) the binding effect of the Preliminary Approval Order and Final Order and Judgment in this action, whether favorable or unfavorable, on all persons who do not timely request exclusion from the Class;*
- (d) was calculated to reach a large number of Class Members, and the prepared notice documents adequately informed Class Members of the class action, properly described their rights, and clearly conformed to the high standards for modern notice programs;*
- (e) focused on the effective communication of information about the class action. The notices prepared were couched in plain and easily understood language and were written and designed to the highest communication standards;*



- (f) afforded sufficient notice and time to Class Members to receive notice and decide whether to request exclusion or to object to the settlement.;*
- (g) was reasonable and constituted due, adequate, effective, and sufficient notice to all persons entitled to be provided with notice; and*
- (h) fully satisfied the requirements of the Federal Rules of Civil Procedure, the United States Constitution, including the Due Process Clause, and any other applicable law.*





United States District Court for the District of Colorado

In re Denver Jail COVID-19 Litigation

Case No. 1:20-cv-01795-JLK

Class Action Notice

Authorized by the U.S. District Court

**Were you
incarcerated in a
Denver County Jail
at anytime between
January 1, 2020 and
February 1, 2022
and did you
contract COVID-19
while incarcerated?**

**There is a class
action lawsuit
and you may
be a class
member.**

**If you want to be
part of the class
action, you do not
need to do
anything.**

**If not, you need to
opt out by [date].**

Important things to know:

- If you take no action, you will be part of the lawsuit, and your rights will be affected.
- You can learn more at: [[website](#)].

Table of Contents

Table of Contents.....	2
About This Notice	3
Why did I get this notice?	3
What do I do next?	3
What is the deadline to opt out?	3
Who is in the class?.....	3
Do I have a lawyer in this lawsuit?	4
Learning About the Lawsuit	4
What is this lawsuit about?	4
What happens next in this lawsuit?	5
Deciding What to Do.....	5
What are my options?	5
Doing Nothing and Staying in the Lawsuit.....	5
What are the consequences of doing nothing?	5
Opting Out.....	6
What If I don't want to be part of this lawsuit?	6
How do I opt out?	6
Key Resources	6
How can I get more information?	6
Instructions for accessing eCourt Public Portal.....	7

About This Notice

Why did I get this notice?

This notice is to tell you that the Court has allowed or “certified” a class action lawsuit. This notice informs you of the nature of the litigation and describes your rights and options. Judge John L. Kane of the United District Court for the District of Colorado is overseeing the lawsuit known as *In re Denver Jail COVID-19 Litigation* brought on behalf of people who contracted SARS-CoV-2 (the “coronavirus”) and became ill with COVID-19 while confined in a Denver County Jail.

You received this notice because you may be a member of the group of people affected, called the “class.” This notice gives you information about the case and tells you how to opt out if you don’t want to be part of it.

It is an important legal document, and we recommend that you read all of it. If you have questions or need assistance, please go to [website] or call [phone number].

What do I do next?

Read this notice to understand the lawsuit and to determine if you are a Class Member. Then, decide if you want to stay in the lawsuit or opt out.

What is the deadline to opt out?

The deadline to ask to be excluded from the lawsuit is [date].

Who is in the class?

This is the definition of the class that the court approved:

Primary Class

All detainees who were placed in the custody of the Denver County Jails

(combined facilities) and tested positive for the coronavirus while detained, excluding those detainees who tested positive at intake and did not contract the virus again while detained. The class period commenced on January 1, 2020, and ended February 1, 2022.

Denver County Jail Class

All detainees who were placed in the custody of the Denver County Jail and tested positive for the coronavirus while detained, excluding those detainees who tested positive at intake and did not contract the virus again while detained. The class period commenced on January 1, 2020, and ended February 1, 2022.

Denver Downtown Jail Class

All detainees who were placed in the custody of the Van Cise-Simonet Downtown Detention Center and tested positive for the coronavirus while detained, excluding those detainees who tested positive at intake and did not contract the virus again while detained. The class period commenced on January 1, 2020, and ended February 1, 2022.

Do I have a lawyer in this lawsuit?

In a class action, the court appoints class representatives and lawyers to work on the case and represent the interests of all the class members. For purposes of this case, the Court has appointed the following lawyers.

Your lawyers: Bradley A. Levin, Robyn Levin, Gideon S. Irving, and Annika K. Adams of LEVIN SITCOFF PC, Rick D. Bailey of LAW OFFICE OF RICK D. BAILEY, ESQ., and Zachary D. Warren of HIGHLANDS LAW FIRM. These are the lawyers who are bringing the case on your behalf. **You will not be charged for their services**, although their fees may be paid with the court's approval from any settlement that is negotiated for the class.

If you want to be represented by your own lawyer, you may hire one at your own expense.

Learning About the Lawsuit

What is this lawsuit about?

Beginning on June 17, 2020, a class action lawsuit was filed against Denver County Jail on behalf of Plaintiffs who were confined in Denver County Jail because of the conditions of their incarceration put them at imminent risk of serious illness and death from COVID-19. The lawsuit alleges that The City and County of Denver ("Defendant") violated the rights of Plaintiffs and other similarly situated individuals by failing to implement proper protocols to reduce the spread of the coronavirus.

Defendant denies that it did anything wrong.

Importantly, this class action has only been certified for the determination of the Defendant's liability, meaning that a separate trial will be needed to determine the damages Defendant must pay to class members if it is found liable at trial for violations of class members' constitutional rights.

What happens next in this lawsuit?

The parties will continue to pursue legal action and prepare the case for trial, unless the two sides decide to settle the case.

Deciding What to Do

What are my options?

You have two options. You can do nothing and stay in the lawsuit, or you can opt out of the lawsuit.

Doing Nothing and Staying in the Lawsuit

What are the consequences of doing nothing?

If you do nothing, you will be part of the lawsuit and your rights will be affected by the outcome. You won't be able to start, continue, or be part of any other lawsuit against the Defendant regarding the same claims.

If, at a later time, the Plaintiffs win or settle, Class Members may be entitled

to money. If the Defendant wins, Class Members will receive nothing.

Opting Out

What If I don't want to be part of this lawsuit?

You can opt out, also known as excluding yourself.

If you choose to opt out, you have decided not to participate in the lawsuit. That means you won't get any benefits if they're awarded, but you can still file your own lawsuit with your own lawyer.

How do I opt out?

To opt out of the lawsuit, you must complete the opt out form included with this notice and mail it by **[date]** to the Notice Administrator:

Notice Administrator
PO Box XXXX
Baton Rouge, LA 70821

Be sure to completely fill out the opt out form and include your signature.

You also have the option of completing the online opt-out form at **{settlement website address}** instead of mailing the included form.

Your opt out form must be postmarked or submitted online **no later than [date]**.

Key Resources

How can I get more information?

This notice summarizes the certification decision. There are more details in the case documents. To get a copy of the case documents or get answers to your questions:

- contact the lawyers who represent the class (information below)

- visit the case website at [website]
- access the Court's [eCourt Public Portal] online or by visiting the Clerk's office of the Court (address below).

Resource	Case Information
Case website	[website]
Toll Free Number	[phone number]
Class Administrator	Notice Administrator PO Box XXXX Baton Rouge, LA 70821
Your Lawyers	Bradley A. Levin Robyn Levin Gideon S. Irving Annika K. Adams LEVIN SITCOFF PC 455 Sherman St., Ste. 490 Denver, CO 80203 (303) 575-9390 brad@lsw-legal.com robyn@lsw-legal.com gideon@lsw-legal.com annika@lsw-legal.com Rick D. Bailey LAW OFFICE OF RICK D. BAILEY, ESQ. 1085 Lafayette St., Suite 702 Denver, CO 80218 (720) 676-6023 rick@rickbaileylaw.com Zachary D. Warren HIGHLANDS LAW FIRM 501 S. Cherry St., 11th Floor Denver, CO 80246 (720) 722-3880 zwarren@highlandslawfirm.com

Court (DO NOT CONTACT)	U.S. District Court For the District of Colorado Alfred A. Arraj United States Courthouse 901 19th Street Denver, CO 80294-3589

Instructions for accessing eCourt Public Portal

To access the Court's eCourt Public Portal at <https://pacer.uscourts.gov>, you will need to create an account. Once logged in, you can then access documents by clicking on "Searches," on the next page clicking on "Case Number Search," then entering the case number, 1:20-cv-01795, and clicking "Search." On the following page, click the case name ink. You may then download images of every document filed in the case for a fee. You may also view images of case documents for free at one of the computer terminal kiosks at court locations.

In re Denver Jail COVID-19 Litigation
Case No. 1:20-cv-01795-JLK

This form EXCLUDES you from this class action lawsuit. If you complete this form, you will NOT receive payment if money is obtained through any judgment or future settlement.

This is NOT a claim form.

Exclusion Request Form

If you exclude yourself (opt-out), you will not be entitled to share in any relief from any judgment, and possibly from any settlement, from this lawsuit. However, if you exclude yourself, you will not be legally bound by any judgment entered in this lawsuit. You will be able to pursue any legal claims that you have on your own and that are involved in this case, now or in the future.

If you do pursue your own lawsuit after you exclude yourself, you will have to hire and pay your own lawyer, and you will have to prove your claims.

I request to be excluded from the lawsuit. I understand that if I am excluded from the lawsuit, I will not receive any benefits from any judgment in this lawsuit. I understand that if I am excluded from the lawsuit, I will not be bound by any judgment in this lawsuit.

Date: _____, 202X _____
(signature)

(You must complete the following information to exclude yourself)

Full Name of Class Member

Street Address

City, State, Zip Code

Telephone Number

Email Address

If you want to exclude yourself from the lawsuit, you must complete this form and mail it by no later than {insert exclusion deadline}, to the following address:

In re Denver Jail COVID-19 Litigation
P.O. Box XXXX
Baton Rouge, LA 70821

Only return this form if you want to pursue your own lawsuit.

You will not be entitled to receive any money or benefits from any judgment or settlement in this lawsuit.

EXHIBIT C



Class Action Notice

Authorized by the
U.S. District Court for the District of Colorado

Were you incarcerated in a Denver County Jail at anytime between January 1, 2020 and February 1, 2022 and did you contract COVID-19 while incarcerated?

There is a class action lawsuit and you may be a class member.

If you want to be part of the class action, you do not need to do anything. If not, you need to opt out by Month DD, 202Y.

WHAT DO I DO NEXT?

Do Nothing

Stay in the lawsuit. If Plaintiffs win or settle, you may get money. If Defendant wins, you get nothing. The outcome will affect your rights

Opt Out

You will not be part of the lawsuit. You won't get any benefits but keep your right to sue the Defendant on your own.

IMPORTANT THINGS TO KNOW

- If you take no action, you will be part of the lawsuit, and your rights will be affected.
- You can learn more at: [www.\[website\].com](http://www.[website].com).

Find more information by scanning the QR code to visit the website ([www.\[website\].com](http://www.[website].com)) or by calling 1-XXX-XXX-XXXX. **EXHIBIT D**



Example QR Code.
Replace this with case
specific QR Code.



Community Facilities

Denver Rescue Mission Lawrence Street Shelter	1130 Park Avenue W, Denver, CO 80205
Samaritan House Homeless Shelter	2301 Lawrence Street, Denver, CO 80205
Denver Rescue Mission Lawrence Street Community Center	2222 Lawrence Street, Denver, CO 80205
Denver Rescue Mission The Crossing	6090 Smith Road, Denver, CO 80216
The Salvation Army Crossroads Center	1901 29 th Street, Denver, CO 80216
Denver Rescue Mission 48 th Avenue Center	4600 48 th Avenue, Denver, CO 80216
Family of Promise of Greater Denver	1600 N Downing Street #500, Denver, CO 80218
The Tamarac Family Shelter	7525 E Hampden Avenue, Denver, CO 80231
Lambuth Family Center	2741 N Federal Boulevard, Denver, CO 80211
Heartbeat Denver Working Men's Program	1680 Sherman Street, Denver, CO 80203
Urban Peak	1630 S Acoma Street, Denver, CO 80223
SafeHouse Denver	1649 N Downing Street, Denver, CO 80218
Samaritan House	4330 E 48 th Avenue, Denver, CO 80216
Denver Rescue Mission	6100 Smith Road, Denver, CO 80216
REshape Minds	1600 N Downing Street, Unit 220, Denver, CO 80218
Comitis Crisis Center	2178 Victor Street, Aurora, CO 80045
Family Tree House of Hope	3301 S Grant Street A, Englewood, CO 80113
Beacon Place	3636 W Colfax Avenue, Denver, CO 80204
The Delores Project	P.O. Box 1406, Denver, CO 80201
Haven of Hope	1101 W 7 th Avenue, Denver, CO 80204
Park Avenue Inn	3500 Park Avenue W, Denver, CO 80216
Warren Village	1323 Gilpin Street, Denver, CO 80218
Providence House	801 Logan Street, Denver, CO 80203
St. Francis Center	2323 Curtis Street, Denver, CO 80205
The Gathering Place	1535 High Street, Denver, CO 80218
Mercy Housing	1600 Broadway, Denver, CO 80202
Family HomeStead	2520 E 37 th Avenue, Denver, CO 80205
Colorado Coalition for the Homeless	2111 Champa Street, Denver, CO 80205
Colorado Coalition for the Homeless	2100 Stout Street, Denver, CO 80205
Second Chance Center	224 Potomac Street, Aurora, CO 80011
Breakthrough Alliance of Colorado	1766 W 46 th Avenue, P.O. Box 11146, Denver, CO 80211
Center for Employment Opportunities	3532 Franklin Street, Suite S, Denver, CO 80205
Servicios de La Raza	3131 W 14 th Avenue, Denver, CO 80204
Servicios de La Raza	200 S Sheridan Boulevard, Denver, CO 80226
Denver Dream Center	2165 Curtis Street, Denver, CO 80205
Joshua Station	2330 W Mulberry Place, Denver, CO 80204

Atlantis Community, Inc.	201 S Cherokee Street Unit 100, Denver, CO 80223
Providence Network – Silver Lining House	357 N Broadway, Denver, CO 80203
Sobriety House	121 Acoma Street, Denver, CO 80223
Mile High Ministries	913 Wyandot Street, Denver, CO 80204
Denver Inner City Parish	1212 Mariposa Street, Denver, CO 80204
Life-Line Colorado	1240 W Bayoud Avenue, Denver, CO 80223
Step Denver	2029 Larimer Street, Denver, CO 80205
Beloved Community Village	4121 Monroe Street, Denver, CO 80216
Empowerment Program	1600 York Street, Denver, CO 80206
Mile High United Way	711 Park Avenue W, Denver, CO 80205
Christ’s Body Ministries	850 Lincoln Street, Denver, CO 80203
SafeHouse Denver	1649 N Downing Street, Denver, CO 80218
Catholic Charities of Denver	6240 Smith Road, Denver, CO 80216
Mile High Recovery Center	1201 E Colfax Avenue, Denver, CO 80218
Guardian Recovery – CuraWest	2535 S Downing Street #500, Denver, CO 80210
Red Rock Recovery Center	8805 W 14 th Avenue #200, Lakewood, CO 80215
Denver Women’s Recovery	3801 E Florida Avenue, Suite 650, Denver, CO 80210
Denver Recovery Group	2822 E Colfax Avenue, Denver, CO 80206
Alpine Recovery Center	1415 Park Avenue W, Denver, CO 80205
Denver CARES	1155 Cherokee Street, Denver, CO 80204
Recover Colorado	5141 W 78 th Avenue, Westminster, CO 80030
Continuum Recovery Center of Colorado	9725 E Hampden Avenue, Suite 308, Denver, CO 80231
Achieve Whole Recovery	1905 Sherman Street #900, Denver, CO 80203
Colorado Medication Assisted Recovery	8800 Fox Drive, Suite 110, Thornton, CO 80260
Footprints to Recovery Addiction Treatment Centers	6505 S Paris Street, Centennial, CO 80111
The Raleigh House	4401 S Quebec Street, Denver, CO 80237
Denver Recovery Center	295 Interlocken Boulevard, Suite 400, Broomfield, CO 80021
Magnolia Recovery Group	2925 E Colfax Avenue, Denver, CO 80206
Rocky Mountain Detox Treatment Center	1348 Pierce Street, Lakewood, CO 80214
Sheridan Grove Recovery	2000 S Blackhawk Street, Aurora, CO 80014
New Beginnings Recovery Center	191 E Orchard Road, Suite A, Littleton, CO 80121
Avenues Recovery Center at Denver	1820 S Potomac Street, Aurora, CO 80012
The Salvation Army Denver Harbor Light Center	2136 Champa Street, Denver, CO 80205
Tribe Recovery Homes, Inc.	1178 Mariposa Street, Denver, CO 80204

True Noth Recovery Services	2696 S Colorado Boulevard #445, Denver, CO 80222
Recovery Monitoring Solutions Denver	930 W 7 th Avenue, Denver, CO 80204
WellPower Mental Health Services Recovery Center	4455 E 12 th Avenue, Denver, CO 80220
Harm Reduction Action Center	112 E 8 th Avenue, Denver, CO 80203
IDEA Denver	2370 W Alameda Avenue #8, Denver, CO 80223
Advocates for Recovery Colorado	3440 W 71 st Place, Westminster, CO 80030
Denver Health Behavioral Health Center	660 Bannock Street, Suite 4754, Denver, CO 80204
AspenRidge Recovery Lakewood	7500 W Mississippi Avenue #200, Lakewood, CO 80226
Tree House Recovery CO	3755 Wazee Street, Denver, CO 80216
Route2Recovery Sober Living	75 S Dover Street, Lakewood, CO 80226
Recovery Hub Colorado	6400 S Fiddlers Green Circle, Suite 323, Greenwood Village, CO 80111
Stout Street Foundation	7251 E 49 th Avenue, Commerce City, CO 80022
BHG Denver Downtown Treatment Center	5250 Leetsdale Drive, Suite 220, Denver, CO 80246
Sandstone Care Denver	7555 E Hampden Avenue #103, Denver, CO 80231
Transitions Sober Living	14957 E Caspian Place, Aurora, CO 80014
Comprehensive Behavioral Health Center	5300 W Alameda Avenue, Lakewood, CO 80226
Porch Light Health	8015 W Alameda Avenue, Suite 260, Lakewood, CO 80226
Red Rock Recovery Center	9189 S Turkey Creek Road, Morrison, CO 80465
Community Medical Services	7205 W Colfax Avenue, Suite 101D, Lakewood, CO 80214
Community Medical Services	14300 E Exposition Avenue, Aurora, CO 80012
Community Medical Services	10690 Del Mar Parkway A, Aurora, CO 80010
All Points North	11951 E Iliff Avenue, Aurora, CO 80014
Footprints to Recovery Addiction Treatment Centers	2602 S Ensenada Way, Aurora, CO 80013
Gallus Medical Detox Colorado	5920 E Eastes Street, Suite 150, Littleton, CO 80123
Valiant Living Men's Recovery Program	5600 S Quebec Street, Suite B-126, Greenwood Village, CO 80111
The Rose House	601 Snowpeak Lane, Lafayette, CO 80026
Food Bank of the Rockies	10700 E 45 th Avenue, Denver, CO 80239

Open Door Ministries	11567 N Marion Street, Denver, CO 80218
Community Table	4600 W 60 th Avenue, Arvada, CO 80003
Covenant Cupboard Food Pantry	5400 S Yosemite Street, Greenwood Village, CO 80111
Denver Food Rescue	3840 York Street #245, Denver, CO 80205
Integrated Family Community Services	3370 S Irving Street, Englewood, CO 80110
WellPower Mental Health Services	1075 Galapago Street, Denver, CO 80204
Rose of Sharon Food Bank	5306 Lincoln Street, Denver, CO 80216
Fern Food Bank	2830 S Zuni Street, Englewood, CO 80110
Bienvenidos Food Bank	3810 N Pecos Street, Denver, CO 80211
Metro Caring	1100 E 18 th Avenue, Denver, CO 80218
Joy's Kitchen Food Rescue	2080 W Barberry Place, Denver, CO 80204
The Gathering Place	1535 High Street, Denver, CO 80218
Hope Starts Here Food Bank	19401 E Chenango Drive, Centennial, CO 80015
Community Ministry of Southwest Denver	1755 S Zuni Street, Denver, CO 80223

Denver City and County Jails

Denver City Jail	490 W Colfax Avenue, Denver, CO 80204
Denver County Jail	10500 E Smith Road, Denver, CO 80239

Colorado Department of Corrections

Arkansas Valley Correctional Facility	12750 Hwy 96 at Lane 13 Ordway, CO. 81034
Buena Vista Correctional Facility	BVCC PO BOX 2017 Buena Vista, CO. 81211
Arrowhead Correctional Center	Arrowhead Correctional Center (ACC) PO BOX 300 Canon City, CO. 81215-0300
Centennial Correctional Center	CENTENNIAL CORRECTIONAL FACILITY PO BOX 600 Canon City, CO. 81215-0600
Colorado State Penitentiary	COLORADO STATE PENITENTIARY PO BOX 777 Canon City, CO. 81215-0777
Colorado Territorial Correctional Facility	Colorado Territorial Correctional Facility PO BOX 1010 Canon City, CO. 81215-1010
Four Mile Correctional Center	PO BOX 300 Canon City, CO. 81215-0300
Fremont Correctional Facility	FREMONT CORRECTIONAL FACILITY PO BOX 999 Canon City, CO. 81215-0999
Skyline Correctional Facility	P.O. Box 300 Canon City, CO 81215-0300
Delta Correctional Center	11363 Lockhart Road Delta, CO. 81416
Denver Reception and Diagnostic Center	PO Box 392004 Denver, CO. 80239
Denver Women's Correctional Facility	PO BOX 392005 Denver, CO. 80239
Limon Correctional Facility	49030 State Hwy 71 South Limon, CO. 80826
Bent County Correctional Facility	11560 Road FF75 Las Animas, CO. 81054
Crowley County Correctional Facility	6564 State Hwy 96 Olney Springs, CO. 81062-8700
La Vista Correctional Facility	PO BOX 3 Pueblo, CO. 81002

San Carlos Correctional Facility	PO BOX 3 Pueblo, CO. 81002
Rifle Correctional Center	200 County Road 219 Rifle, CO 81650
Sterling Correctional Facility	P.O. Box 6000 Sterling, CO 80751
Trinidad Correctional Facility	Trinidad Correctional Facility 21000 HWY 350 East Model, CO. 81059