

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

RHONDA BURNETT, JEROD BREIT, HOLLEE ELLIS,
FRANCES HARVEY, and JEREMY KEEL, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

THE NATIONAL ASSOCIATION OF REALTORS,
REALOGY HOLDINGS CORP., HOMESERVICES OF
AMERICA, INC., BHG AFFILIATES, LLC, HSF
AFFILIATES, LLC, RE/MAX LLC, and KELLER
WILLIAMS REALTY, INC.,

Defendants.

Case No. 19-CV-00332-SRB

DON GIBSON, LAUREN CRISS,
JOHN MEINERS, AND DANIEL UMPA,
Individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

NATIONAL ASSOCIATION OF
REALTORS, et al.,

Defendants.

Case No. 4:23-cv-00788-SRB
[Consolidated with
4:23-cv-00945-SRB]

DECLARATION OF JENNIFER M. KEOUGH

I, Jennifer M. Keough, declare as follows:

1. I am Chief Executive Officer, President, and Co-Founder of JND Legal Administration LLC (“JND”). I have more than 20 years of experience creating and supervising

legal notice and claims administration programs and have personally overseen well over 1,000 matters.

2. I previously submitted Declarations in this matter dated June 9, October 22, and November 20, 2025, providing quarterly accounting of all fees and charges requested from the Settlement Fund by JND pursuant to the Court's Order, dated May 7, 2025. Those declarations are incorporated herein by reference.

3. This Declaration is submitted in response to the Court's Order dated October 22, 2025, ordering that "the next accounting is due within thirty (30) days from the date of this Order and quarterly thereafter."

4. Since my last Declaration in this matter, dated November 20, 2025, JND submitted two invoices to plaintiffs' counsel for its continued work on this administration and two invoices related to providing notice of the new Settlements. The invoices are for \$78,850.78, \$144,163.72, \$164,590.58, and \$8,189.43 respectively and are attached hereto as Exhibit A.

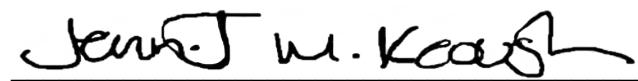
5. As stated in my previous Declarations, none of JND, its employees and officers, or any entity affiliated with JND has received any compensation (including but not limited to rebates, awards, and/or credits) from any bank, vendor, or other third party in connection with any of our work on the NOP or Realtors Settlements. The attached invoices represent all fees and charges incurred by JND for its services in this litigation since our last accounting. JND will transparently report any payments received in connection with this matter on future invoices. JND has not received any additional fees, charges, rebates, awards, credits from vendors, or financial benefits from banks, including Morgan Stanley, or other institutions.

6. None of the individual attorneys or firms representing Plaintiffs in this action have any ownership or other financial interest in JND. JND has not and will not offer or provide any

compensation of any kind (including but not limited to rebates, awards, credits, or other financial benefits) to any outside person or entity regarding this litigation.

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

Executed on January 14, 2026, in Seattle, Washington.



JENNIFER M. KEOUGH