



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
2/21/2024	171058

PROJECT	TERMS
NA2 - Moehrl v. The National Association	Deferred

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (Inception - January 31, 2024)		
2	Case Website	210.00	420.00
	Publish Notice Summary Notice Publication	4,325.00	4,325.00
2.25	Call Center	125.00	281.25
5,139,481	Print and Mail Notice		
13,608,182	Mail Postcard	0.07	359,763.67
	Email Short Form Notice	0.006	81,649.09
51.75	Project Management	265.00	13,713.75
5,139,481	Expenses: Postcard Postage	0.357	1,834,794.72

Invoice Total \$2,294,947.48

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,996,807.75



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Class Action Administration LLC
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800.207.7160
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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/15/2024	171400

PROJECT	TERMS
NA2 - Moehrl v. The National Association	Deferred

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (February 1 - 29, 2024)		
4	Publish Notice	275.00	1,100.00
	Summary Notice Publication	4,325.00	4,325.00
2.75	Call Center	65.00	178.75
	Monthly TFN Hosting	175.00	175.00
6,670.91	Monthly IVR Minutes	0.19	1,267.47
16.25	Email Notice	143.00	2,323.75
	Print and Mail Notice		
1,381,671	Estimated Reminder Postcard Printing	0.075	103,625.33
8.75	Format/Quality Review Notice Packet	124.00	1,085.00
93.5	Project Management	173.00	16,175.50
	Expenses:		
5,139,481	Postcard Postage	0.35577	1,828,473.16
5,139,481	Credit for Prebilled Postcard Postage	-0.357	-1,834,794.72
1,381,671	Estimated Reminder Postcard Postage	0.35755	494,016.47
	Copy Charges	72.00	72.00
	Travel Expenses	1,161.26	1,161.26
	Supplies	3.60	3.60
	Postage	21.12	21.12

Invoice Total

Payment Instructions

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DATE	INVOICE #
4/15/2024	171400

PROJECT	TERMS
NA2 - Moehrl v. The National Association	Deferred

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
6,264,405	Electronic Data Storage (65% Discount)	0.002	12,528.81

	Invoice Total \$631,737.50
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Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101	Total Balance Due \$2,996,807.75
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Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/29/2024	171571

PROJECT	TERMS
NA2 - Moehtl v. The National Association	Deferred

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (March 1 - 31, 2024)		
7.75	Call Center	74.00	573.50
1	Monthly TFN Hosting	175.00	175.00
10,664.49	Monthly IVR Minutes	0.19	2,026.25
36.25	Email Notice	155.00	5,618.75
134,102	Email Short Form Notice	0.006	804.61
	Print and Mail Notice		
396,770	Process Undeliverables	0.05	19,838.50
34,818	Forward Notices	0.06	2,089.08
59	Project Management	113.00	6,667.00
	Expenses:		
	Copy Charges	125.00	125.00
	Supplies	10.75	10.75
	Postage	345.55	345.55
6,315,771	Electronic Data Storage (65% Discount)	0.002	12,631.54
1	PO Box	175.00	175.00

Invoice Total \$51,080.53

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,996,807.75



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
5/30/2024	171774

PROJECT	TERMS
NA2 - Moehrl v. The National Association	Deferred

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (April 1 - 30, 2024)		
7.75	Call Center	65.00	503.75
1	Monthly TFN Hosting	175.00	175.00
11,511.69	Monthly IVR Minutes	0.19	2,187.22
	Print and Mail Notice Packet		
7,945	Process Undeliverables	0.05	397.25
34.25	Project Management	79.00	2,705.75
	Expenses:		
	Supplies	81.15	81.15
	Postage	113.17	113.17
6,351,976	Electronic Data Storage (65% Discount)	0.002	12,703.95
1	PO Box	175.00	175.00

Invoice Total \$19,042.24

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,996,807.75



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PAID
07/18/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
1/24/2024	170831

PROJECT			TERMS
NAR - National Association of Realtors Se			Settlement Fund
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Postcard Notice Prebill		
10,200,000	Estimated Color Postcard Printing	0.07	714,000.00
10,200,000	Estimated Postcard Postage	0.357	3,641,400.00
Invoice Total			\$4,355,400.00
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101 			



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
2/21/2024	171057

PROJECT			TERMS
NAR - National Association of Realtors Se			Deferred
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (Inception - January 31, 2024)		
359.75	Design & Develop Dedicated Website	210.00	75,547.50
106	Publish Notice	230.00	24,380.00
	Top Class Action Sponsorship	12,500.00	12,500.00
	ClassAction.org Sponsorship	10,000.00	10,000.00
	Google, OMTD, Facebook	206,554.00	206,554.00
	Better Homes & Garden	110,000.00	110,000.00
	National Hispanic Newslne	3,280.00	3,280.00
1	IVR Setup	2,500.00	2,500.00
	Email Notice		
21,890,754	Email Append	0.03	656,722.62
27,104,112	Email Short Form Notice	0.006	162,624.67
	Print and Mail Notice		
10,406,309	Scratched Postcard	0.05	520,315.45
206,670	Additional Postcard Notice	0.07	14,466.90
15	Format/Quality Review Notice Packet	150.00	2,250.00
739	Project Oversight	245.00	181,055.00
Invoice Total			
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due



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Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
2/21/2024	171057

PROJECT	TERMS
NAR - National Association of Realtors Se	Deferred

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
6	Expenses: PO Box Domain Registration OCF Hosting Copy Charges Travel to QA Notice Mailing Case Website Vulnerability Scan Translation Data Axle -US Consumer Data List Core Logic Expense to obtain owner transaction data Additional Postage for 206,670 Postcard Notices	 175.00 670.64 439.85 11.00 2,884.10 4,720.00 2,104.19 203,962.50 82,687.50 110,626.56	 1,050.00 670.64 439.85 11.00 2,884.10 4,720.00 2,104.19 203,962.50 82,687.50 110,626.56

Invoice Total \$2,391,352.48

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,172,797.78



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/15/2024	171399

PROJECT			TERMS
NAR - National Association of Realtors Se			Net 30
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (February 1 - 29, 2024)		
58.25	Design & Develop Dedicated Website	214.00	12,465.50
47.25	Publish Notice	269.00	12,710.25
1	Call Center		
	Monthly TFN Hosting	175.00	175.00
37,405.83	Monthly IVR Minutes	0.19	7,107.11
67.25	Email Communications	86.00	5,783.50
116.75	Email Notice	251.00	29,304.25
27,211,852	Email Short Form Notice	0.006	163,271.11
27,104,112	Credit for Prebilled Email Short Form Notice	-0.006	-162,624.67
	Print and Mail Notice		
7.25	Format/Quality Review Notice Packet	137.00	993.25
0.75	Track Undeliverables / Process Forwards	135.00	101.25
3,533,522	Estimated Reminder Postcard Printing	0.075	265,014.15
352.75	Project Oversight	188.00	66,317.00
Invoice Total			
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due



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07/18/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/15/2024	171399

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
1	Expenses:		
	PO Box	175.00	175.00
	OCF Hosting	1,825.50	1,825.50
	Copy Charges	801.75	801.75
	Travel to QA Notice Mailing	4,398.51	4,398.51
	Case Website Vulnerability Scan	4,720.00	4,720.00
	Translation	253.75	253.75
	Postage	234.21	234.21
	Supplies	25.91	25.91
31,322,028	Electronic Data Storage (65% Discount)	0.002	62,644.06
1	Box Storage	2.50	2.50
	AWS	13.76	13.76
3,533,522	Estimated Reminder Postcard Postage	0.36	1,272,067.92

Invoice Total \$1,747,780.57

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,172,797.78



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/29/2024	171572

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (March 1 - 31, 2024)		
26	Design & Develop Dedicated Website	206.00	5,356.00
29.75	Publish Notice	270.00	8,032.50
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
42,729.9	Monthly IVR Minutes	0.19	8,118.68
130.75	Monitor Inboxes for Exclusions/Objections/Claim Form Submissions	78.00	10,198.50
47.75	Front Desk Inquiries	108.00	5,157.00
22.25	Handling Class Member Notice and Claim Form Requests	65.00	1,446.25
49.25	Email Notice	158.00	7,781.50
5,033,446	Email Short Form Notice	0.006	30,200.68
	Print and Mail Notice		
478,357	Address Research	0.03	14,350.71
711,573	Process Undeliverables	0.05	35,578.65
60,556	Mail Forwards	0.06	3,633.36
361	Project Oversight	235.00	84,835.00

Invoice Total

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/29/2024	171572

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
1	Expenses:		
	PO Box	175.00	175.00
	OCF Hosting	5,403.78	5,403.78
	Copy Charges	2,351.75	2,351.75
	Travel to QA Notice Mailing	2,418.91	2,418.91
	Postage	685.12	685.12
	Supplies	92.93	92.93
31,578,857	Electronic Data Storage (65% Discount)	0.002	63,157.71
9	Box Storage	2.50	22.50
	AWS	15.41	15.41
3,533,522	Credit for Prebilled Postcard Postage	-0.36	-1,272,067.92
3,533,522	Postcard Postage	0.36219	1,279,806.33

Invoice Total \$296,925.35

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,172,797.78



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07/18/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
5/30/2024	171773

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (April 1 - 30, 2024)		
60.5	Design & Develop Dedicated Website	207.00	12,523.50
24.75	Publish Notice	219.00	5,420.25
	CAFA	2,750.00	2,750.00
1	Call Center	175.00	175.00
53,106.41	Monthly TFN Hosting	0.19	10,090.22
	Monthly IVR Minutes		
191.5	Monitor Inboxes for Exclusions/Objections/Claim Form Submissions	87.00	16,660.50
31	Handling Class Member Notice and Claim Form Requests	65.00	2,015.00
	Print and Mail Notice Packet		
29,763	Process Undeliverables	0.05	1,488.15
629.25	Project Oversight	165.00	103,826.25
	Expenses:		
	OCF Hosting	4,762.88	4,762.88
	Copy Charges	942.50	942.50

	Invoice Total
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Total Balance Due



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Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
5/30/2024	171773

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Postage	500.53	500.53
	Supplies	240.61	240.61
2	PO Box	175.00	350.00
	AWS	12.15	12.15
17	Box Storage	2.50	42.50
31,759,878	Electronic Data Storage (65% Discount)	0.002	63,519.76

Invoice Total \$225,319.80

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,172,797.78



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PAID
07/18/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
6/21/2024	171856

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (May 1 - 31, 2024)		
6.5	Design & Develop Dedicated Website	189.00	1,228.50
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
18,829.68	Monthly IVR Minutes	0.19	3,577.64
29.75	Class Member Communications	126.00	3,748.50
93.75	Monitor Inboxes for Exclusions/Objections/Claim Form Submissions	81.00	7,593.75
8	Handling Class Member Notice and Claim Form Requests	65.00	520.00
	Print and Mail Notice		
1,290	Mail Forwards	0.06	77.40
	Process Forms		
8,038	Paper Claims	5.95	47,826.10
210,629	Online Claims	0.95	200,097.55
836.75	Project Oversight	131.00	109,614.25
	Expenses:		

	Invoice Total
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Payment Instructions

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Total Balance Due



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
6/21/2024	171856

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	OCF Hosting	2,302.75	2,302.75
	Copy Charges	1,831.75	1,831.75
	Postage	68.16	68.16
	Supplies	79.10	79.10
2	PO Box	175.00	350.00
25	Box Storage	2.50	62.50
	Amazon Web Services	2.99	2.99
39,253,464	Electronic Data Storage (65% Discount)	0.002	78,506.93

Invoice Total \$457,662.87

Payment Instructions

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\$2,172,797.78



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09/23/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
7/11/2024	172020

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Postcard Notice Prebill		
13,800,000	Estimated Postcard Postage	0.384	5,299,200.00
13,800,000	Estimated Postcard Printing	0.07	966,000.00

Invoice Total \$6,265,200.00

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$7,234.32



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
7/29/2024	172145

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (Inception - June 30, 2024)		
22.5	Case Website with Online Filing	197.00	4,432.50
6.75	Publish Notice	221.00	1,491.75
157.75	Project Oversight/ Database Management	204.00	32,181.00

	Invoice Total	\$38,105.25
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Payment Instructions

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Total Balance Due

\$7,234.32



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PAID
09/23/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
8/28/2024	172398

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (July 1 - 31, 2024)		
45.5	Case Website with Online Filing	207.00	9,418.50
43.75	Publish Notice	255.00	11,156.25
	Summary Notice Publication	76,140.00	76,140.00
	CAFA	2,750.00	2,750.00
	Print and Mail Notice Packet		
13,850,045	Notice Printing	0.07	969,503.15
13,800,000	Credit for Prebilled Notice Printing	-0.07	-966,000.00
40.5	Email Notice	124.00	5,022.00
28,991	Sent Email	0.01	289.91
2	Manage Settlement Fund	135.00	270.00
572.5	Project Oversight/ Database Management	196.00	112,210.00
	Expenses:		
1,856,050	Travel Expenses for onsite notice	1,859.68	1,859.68
	Address Research	0.03	55,681.50
	CAFA Postage	1,292.39	1,292.39
	Postage	248.90	248.90
	Supplies	0.14	0.14

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Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
8/28/2024	172398

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
1	PO Box	175.00	175.00
13,850,045	Postcard Postage	0.3893	5,391,822.52
13,800,000	Credit for Prebilled Postcard Postage	-0.384	-5,299,200.00

Invoice Total \$372,639.94

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$7,234.32



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PAID
12/20/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
9/23/2024	172605

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (August 1 - 31, 2024)		
0.75	Case Website with Online Filing	395.00	296.25
64	Publish Notice	249.00	15,936.00
	Summary Notice Publication	252,155.00	252,155.00
	Print and Mail Notice Packet		
1,000,000	Notice Printing	0.07	70,000.00
893,437	Track and Research Undeliverable Mail	0.05	44,671.85
121,643	Remail Undeliverables	0.06	7,298.58
65	Email Notice	139.00	9,035.00
25,940,643	Sent Email	0.006	155,643.86
2	Manage Settlement Fund	135.00	270.00
316.25	Project Oversight/ Database Management	165.00	52,181.25
	Expenses:		
531,464	Address Research	0.03	15,943.92
	CAFA Postage	1,408.25	1,408.25
	Postage	346.05	346.05
1	PO Box	175.00	175.00

Invoice Total \$625,361.01

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$7,234.32



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

PAID
12/20/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
10/30/2024	172934

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (September 1 - 30, 2024)		
15.75	Case Website with Online Filing	208.00	3,276.00
16	Publish Notice	255.00	4,080.00
	Summary Notice Publication	16,104.00	16,104.00
6.25	Email Notice	147.00	918.75
2,083,637	Sent Email	0.006	12,501.82
120.75	Project Oversight/ Database Management	93.00	11,229.75
	Expenses:		
	Postage	261,994.73	261,994.73
	Supplies	190.78	190.78

Invoice Total \$310,295.83

Payment Instructions

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Total Balance Due

\$7,234.32



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12/20/2024

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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
11/26/2024	173117

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (October 1 - 31, 2024)		
0.5	Case Website with Online Filing	160.00	80.00
47,601	Print and Mail Notice Process Undeliverables	0.05	2,380.05
132.25	Project Oversight/ Database Management	159.00	21,027.75
132,234	Expenses: Postage Supplies	0.40163 21.39	53,109.14 21.39

	Invoice Total	\$76,618.33
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Total Balance Due

\$7,234.32



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
12/26/2024	173786

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (November 1 - 30, 2024)		
0.75	Case Website with Online Filing	160.00	120.00
6,191	Print and Mail Notice Process Undeliverables	0.05	309.55
11.75	Project Oversight/ Database Management	166.00	1,950.50
	Expenses: Supplies	12.25	12.25

	Invoice Total	\$2,392.30
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Payment Instructions

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\$7,234.32



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
1/24/2025	173997

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (December 1 - 31, 2024)		
328	Print and Mail Notice Process Undeliverables	0.05	16.40
0.75	Manage Settlement Fund	160.00	120.00
24.75	Project Oversight/ Database Management	135.00	3,341.25
	Expenses: Supplies	2.98	2.98

	Invoice Total	\$3,480.63
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Payment Instructions

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Total Balance Due

\$7,234.32



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BILL TO
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DATE	INVOICE #
2/20/2025	174120

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (January 1 - 31, 2025)		
9	Project Oversight/ Database Management	151.00	1,359.00
	Expenses: Amazon Web Services	2.39	2.39

	Invoice Total	\$1,361.39
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\$7,234.32



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09/23/2024

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
7/11/2024	172018

PROJECT			TERMS
NA3 - Burnett et al. v. The NAR			Settlement Fund
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Postcard Notice Prebill		
13,800,000	Estimated Postcard Postage	0.384	5,299,200.00
13,800,000	Estimated Postcard Printing	0.07	966,000.00
Invoice Total \$6,265,200.00			
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due
			\$0.00



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PAID
09/23/2024

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
8/28/2024	172397

PROJECT	TERMS
NA3 - Burnett et al. v. The NAR	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
42.25	Billing Period (Inception - July 31, 2024) Project Management	273.00	11,534.25
1	Expenses: PO Box	175.00	175.00

	Invoice Total	\$11,709.25
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Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101 [REDACTED]	Total Balance Due \$0.00
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12/12/2024

Invoice

BILL TO
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DATE	INVOICE #
9/23/2024	172604

PROJECT			TERMS
NA3 - Burnett et al. v. The NAR			Settlement Fund
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (August 1 - 31, 2024)		
198.5	Project Management and Database Support	203.00	40,295.50
31.75	Case Website	145.00	4,603.75
39	Publish Notice	245.00	9,555.00
	Summary Notice Publication	110,625.00	110,625.00
	Print and Mail Notice		
14,500,000	Postcard Printing	0.07	1,015,000.00
13,800,000	Credit for Prebilled Postcard Printing	-0.07	-966,000.00
18.5	Email Notice	163.00	3,015.50
	Expenses:		
1	PO Box	175.00	175.00
	Postage	1,682.04	1,682.04
	Translation	1,563.75	1,563.75
	Travel Expenses	1,430.83	1,430.83
13,979,298	Postcard Postage	0.38624	5,399,364.06
13,800,000	Credit for Prebilled Postcard Postage	-0.384	-5,299,200.00
Invoice Total			\$322,110.43
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due
			\$0.00



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BILL TO
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DATE	INVOICE #
10/30/2024	172932

PROJECT			TERMS
NA3 - Burnett et al. v. The NAR			Settlement Fund
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (September 1 - 30, 2024)		
131.5	Project Management and Database Support	193.00	25,379.50
	Publish Notice		
	Summary Notice Publication	258,344.00	258,344.00
	Email Notice		
26,586,302	Sent Email	0.006	159,517.81
	Print and Mail Notice		
928,595	Process Undeliverables	0.05	46,429.75
116,276	Mail Forwards	0.06	6,976.56
	Expenses:		
	Postage	2.86	2.86
	Travel Expenses	503.86	503.86
80,468	Postcard Postage	0.40179	32,331.24
	Supplies	170.24	170.24
Invoice Total			\$529,655.82
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due
			\$0.00



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PAID
12/12/2024

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
12/4/2024	173172

PROJECT	TERMS
NA3 - Burnett et al. v. The NAR	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (October 1 - 31, 2024)		
88.75	Project Management and Database Support	184.66761	16,389.25
	CAFA	2,750.00	2,750.00
	Print and Mail Notice		
200,000	Postcard Printing	0.07	14,000.00
29,980	Process Undeliverables	0.05	1,499.00
3,241	Remail Forwards	0.06	194.46
	Expenses:		
	CAFA Postage	558.96	558.96
622,989	Postcard Postage	0.39769	247,756.50
	Supplies	54.41	54.41
	Address Research	108.90	108.90

Invoice Total \$283,311.48

Payment Instructions

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Total Balance Due

\$0.00



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12/12/2024

Invoice

BILL TO
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DATE	INVOICE #
12/4/2024	173173

PROJECT	TERMS
NA3 - Burnett et al. v. The NAR	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
66	Email Reminder Notice		
187,989	Opt In Reminder Notice Sent Email	204.20455 0.006	13,477.50 1,127.93

	Invoice Total \$14,605.43
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Payment Instructions

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Total Balance Due

\$0.00



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PAID
03/18/2025

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
12/26/2024	173784

PROJECT	TERMS
NA3 - Burnett et al. v. The NAR	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (November 1 - 30, 2024)		
127	Project Management and Database Support	195.00	24,765.00
8,370	Print and Mail Notice		
223	Process Undeliverables	0.05	418.50
	Remail Forwards	0.06	13.38
	Expenses:		
	Supplies	30.16	30.16
	FedEx	1,048.22	1,048.22

Invoice Total \$26,275.26

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$0.00



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PAID
03/18/2025

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
12/26/2024	173785

PROJECT			TERMS
NA3 - Burnett et al. v. The NAR			Settlement Fund
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
23,883,242	Email Reminder Notice Opt In Reminder Notice Sent Email	0.006	143,299.45
Invoice Total			\$143,299.45
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101 [REDACTED]			Total Balance Due \$0.00



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PAID
03/18/2025

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
1/24/2025	173996

PROJECT			TERMS
NA3 - Burnett et al. v. The NAR			Settlement Fund
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (December 1 - 31, 2024)		
3,524	Print and Mail Notice	0.05	176.20
97	Process Undeliverables	0.06	5.82
	Remail Forwards		
71.5	Project Management and Database Support	155.00	11,082.50
	Expenses:		
	Supplies	12.72	12.72
	Address Research	4,855.08	4,855.08
Invoice Total			\$16,132.32
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due
			\$0.00



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PAID
03/18/2025

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
2/20/2025	174119

PROJECT	TERMS
NA3 - Burnett et al. v. The NAR	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (January 1 - 31, 2025)		
260	Print and Mail Notice		
	Process Undeliverables	0.05	13.00
14	Remail Forwards	0.06	0.84
10	Project Management and Database Support	206.00	2,060.00

	Invoice Total	\$2,073.84
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$0.00



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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
12/26/2024	173787

PROJECT	TERMS
NA5 - Gibson - Next Home, Keyes Company,	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (November 1 - 30, 2024)		
	CAFA	2,750.00	2,750.00
1	Publish Notice	210.00	210.00
2	Project Management/Database Support	432.00	864.00
60	Expenses: CAFA Postage	17.21883	1,033.13

	Invoice Total	\$4,857.13
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Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101	Total Balance Due
	\$733,538.12



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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
1/24/2025	173998

PROJECT	TERMS
NA5 - Gibson - Next Home, Keyes Company,	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (December 1 - 31, 2024)		
2	Manage Settlement Fund	126.00	252.00
0.25	Project Management/Database Support	160.00	40.00

	Invoice Total	\$292.00
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$733,538.12





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BILL TO
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DATE	INVOICE #
2/20/2025	174122

PROJECT	TERMS
NA6 - Keel - Side, Seven Gables, WFP, JPA	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (Inception - January 31, 2025)		
4.75	Case Website	197.00	935.75
	CAFA	2,750.00	2,750.00
27	Project Management	191.00	5,157.00

	Invoice Total	\$8,842.75
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$8,842.75



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BILL TO
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DATE	INVOICE #
3/20/2025	174398

PROJECT			TERMS
NA5 - Gibson - Next Home, Keyes Company,			Settlement Fund
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (February 1 - 28, 2025)		
11.25	Case Website	187.00	2,103.75
22	Publish Notice	234.00	5,148.00
	Summary Notice Publication	13,285.00	13,285.00
	Gibson CAFA	2,750.00	2,750.00
	Keel CAFA	2,750.00	2,750.00
9.5	Call Center	196.00	1,862.00
45.75	Email Notice	163.00	7,457.25
5,684	Send Email	0.006	34.10
3	Format/Quality Review Notice Packet	160.00	480.00
9.75	Manage Settlement Fund	136.00	1,326.00
266.25	Project Management/Database Support	205.00	54,581.25
	Expenses:		
	CAFA Postage	3,085.48	3,085.48
	Translation	1,581.25	1,581.25
	Address Research	11,573.91	11,573.91
Invoice Total			\$108,017.99
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due
			\$733,538.12



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/30/2025	174733

PROJECT	TERMS
NA5 - Gibson - Next Home, Keyes Company,	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (March 1 - 31, 2025)		
13.25	Publish Notice	257.00	3,405.25
	Summary Notice Publication	223,085.00	223,085.00
16.25	Call Center	207.00	3,363.75
	Mail Notice		
27,704	Mail Postcard	0.211	5,845.54
34.25	Email Notice	161.00	5,514.25
18,759,758	Send Email	0.006	112,558.55
156.5	Project Management/Database Support	150.00	23,475.00
	Expenses:		
	CAFA Postage	95.78	95.78
	Address Research	1,573.47	1,573.47
	Class Mailing List	95,241.67	95,241.67
	Postage	11,347.36	11,347.36

Invoice Total \$485,505.62

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$733,538.12



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
5/15/2025	174772

PROJECT	TERMS
NA5 - Gibson - Next Home, Keyes Company,	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (April 1 - 30, 2025)		
11.25	Publish Notice	241.00	2,711.25
	Summary Notice Publication	35,430.00	35,430.00
20,931	Mail Notice		
	Mail Postcard	0.21	4,395.51
63	Email Notice	188.00	11,844.00
6,947,548	Send Email	0.006	41,685.29
50.25	Project Management/Database Support	140.00	7,035.00
	Expenses:		
	Address Research	12,896.88	12,896.88
	Postage	8,999.95	8,999.95

Invoice Total \$124,997.88

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$733,538.12



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BILL TO
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DATE	INVOICE #
7/29/2024	172144

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (June 1 - 30, 2024)		
9	Design & Develop Dedicated Website	204.00	1,836.00
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
6,984.84	Monthly IVR Minutes	0.19	1,327.12
16.25	Class Member Communications	121.00	1,966.25
25.25	Monitor Inboxes for Exclusions/Objections/Claim Form Submissions	80.00	2,020.00
4.5	Handling Class Member Notice and Claim Form Requests	65.00	292.50
1	Tax Reporting	65.00	65.00
558.5	Project Oversight/ Database Management	136.00	75,956.00
	Expenses:		
	OCF Hosting	959.50	959.50
	Copy Charges	233.25	233.25
	Supplies	32.34	32.34
2	PO Box	175.00	350.00
32	Box Storage	2.50	80.00

	Invoice Total
--	---------------

Payment Instructions

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Total Balance Due



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02/24/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
7/29/2024	172144

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
39,396,930	Electronic Data Storage (65% Discount)	0.002	78,793.86
598,155	Fraudulent Claims Prevention Tool	0.0018	1,076.68

Invoice Total \$165,163.50

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,172,797.78



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

PAID
02/24/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
8/28/2024	172396

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (July 1 - 31, 2024)		
6.75	Design & Develop Dedicated Website	162.00	1,093.50
0.5	Publish Notice	325.00	162.50
1	Call Center		
	Monthly TFN Hosting	175.00	175.00
20,775.56	Monthly IVR Minutes	0.19	3,947.36
348.25	Class Member Communications	74.00	25,770.50
51.25	Review and Respond to Class Member Emails	84.00	4,305.00
0.25	Tax Reporting	65.00	16.25
	Process Forms		
11,248	Online Claims	0.95	10,685.60
1,672	Paper Claims	5.95	9,948.40
419.75	Project Oversight/ Database Management	143.00	60,024.25
	Expenses:		
	OCF Hosting	2,097.00	2,097.00
	Copy Charges	1,291.25	1,291.25
	Supplies	6.82	6.82

	Invoice Total
--	---------------

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
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02/24/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
8/28/2024	172396

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
2	PO Box	175.00	350.00
	Box Storage	298.58	298.58
39,584,101	Electronic Data Storage (65% Discount)	0.002	79,168.20
345,825	Fraudulent Claims Prevention Tool	0.0018	622.49
	Postage	40.73	40.73
	Translation	121.55	121.55

Invoice Total \$200,124.98

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,172,797.78



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PAID
02/24/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
9/23/2024	172603

PROJECT			TERMS
NAR - National Association of Realtors Se			Net 30
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (August 1 - 31, 2024)		
64	Design & Develop Dedicated Website	207.00	13,248.00
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
170,174.85	Monthly IVR Minutes	0.19	32,333.22
3,410.5	Class Member Communications	73.00	248,966.50
6.25	Tax Reporting	158.00	987.50
	Process Forms		
104,441	Online Claims	0.95	99,218.95
3,625	Paper Claims	5.95	21,568.75
758.75	Project Oversight/ Database Management	148.00	112,295.00
	Expenses:		
	OCF Hosting	4,900.03	4,900.03
	Copy Charges	2,694.00	2,694.00
	Supplies	181.79	181.79
2	PO Box	175.00	350.00
	Box Storage	269.32	269.32
42,627,064	Electronic Data Storage (65% Discount)	0.002	85,254.13
641,710	Fraudulent Claims Prevention Tool	0.0018	1,155.08
Invoice Total			
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due



PAID
02/24/2025

DATE	INVOICE #
9/23/2024	172603

Hagens Bergman LLP
One Main Street, Fourth Floor
Cambridge, MA 02142

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Postage	349.71	349.71
	Translation	695.30	695.30
	Address Research	9,312.72	9,312.72

Invoice Total \$633,955.00

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,172,797.78



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
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PAID
02/24/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
10/30/2024	172929

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (September 1 - 30, 2024)		
11	Design & Develop Dedicated Website	144.00	1,584.00
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
112,659.58	Monthly IVR Minutes	0.19	21,405.32
1,784.9	Class Member Communications	75.00	133,867.50
2.25	Email Notice	210.00	472.50
	Print and Mail Notice		
193,851	Process Undeliverables	0.05	9,692.55
49,693	Mail Forwards	0.06	2,981.58
0.5	Tax Reporting	325.00	162.50
	Process Forms		
85,372	Online Claims	0.95	81,103.40
2,554	Paper Claims	5.95	15,196.30
1,050	Project Oversight/ Database Management	131.00	137,550.00
	Expenses:		
	OCF Hosting	2,106.28	2,106.28

	Invoice Total
--	---------------

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
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accounting@classactionadmin.com
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02/24/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
10/30/2024	172929

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Copy Charges	1,732.50	1,732.50
	Supplies	415.76	415.76
2	PO Box	175.00	350.00
58	Box Storage	2.50	145.00
43,241,142	Electronic Data Storage (65% Discount)	0.002	86,482.28
382,178	Fraudulent Claims Prevention Tool	0.0018	687.92
	Postage	259.21	259.21
	Translation	225.25	225.25

Invoice Total \$496,594.85

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,172,797.78



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PAID
02/24/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
11/26/2024	173118

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (October 1 - 31, 2024)		
12.25	Design & Develop Dedicated Website	157.00	1,923.25
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
50,523.84	Monthly IVR Minutes	0.19	9,599.53
821.5	Class Member Communications	76.00	62,434.00
2.25	Email Notice	187.00	420.75
	Print and Mail Notice		
23,388	Process Undeliverables	0.05	1,169.40
7,978	Mail Forwards	0.06	478.68
1.75	Tax Reporting	65.00	113.75
	Process Forms		
49,203	Online Claims	0.95	46,742.85
2,592	Paper Claims	5.95	15,422.40
817.5	Project Oversight/ Database Management	153.00	125,077.50
	Expenses:		
	OCF Hosting	944.37	944.37

	Invoice Total
--	---------------

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
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02/24/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
11/26/2024	173118

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Copy Charges	2,076.25	2,076.25
	Supplies	56.29	56.29
2	PO Box	175.00	350.00
	Box Storage	245.10	245.10
43,489,156	Electronic Data Storage (65% Discount)	0.002	86,978.31
248,571	Fraudulent Claims Prevention Tool	0.0018	447.43
	Postage	111.52	111.52
	Translation	136.00	136.00
	Address Research	13,781.22	13,781.22

Invoice Total \$368,683.60

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,172,797.78



CLASS ACTION
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02/24/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
12/26/2024	173782

PROJECT			TERMS
NAR - National Association of Realtors Se			Net 30
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (November 1 - 30, 2024)		
1.5	Design & Develop Dedicated Website	160.00	240.00
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
25,240	Monthly IVR Minutes	0.19	4,795.60
409.5	Class Member Communications	79.00	32,350.50
0.25	Tax Reporting	160.00	40.00
	Process Forms		
23,285	Online Claims	0.95	22,120.75
500	Paper Claims	5.95	2,975.00
392.85	Project Oversight/ Database Management	161.00	63,248.85
	Expenses:		
	OCF Hosting	1,643.27	1,643.27
	Copy Charges	488.00	488.00
	Supplies	27.08	27.08
2	PO Box	175.00	350.00
	Box Storage	272.54	272.54
43,661,650	Electronic Data Storage (65% Discount)	0.002	87,323.30
124,844	Fraudulent Claims Prevention Tool	0.0018	224.72
Invoice Total			
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due



PAID
02/24/2025

DATE	INVOICE #
12/26/2024	173782

Hagens Bergman LLP
One Main Street, Fourth Floor
Cambridge, MA 02142

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

[illegible]**Invoice Total** \$216,313.79

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,172,797.78



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
1/24/2025	173995

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (December 1 - 31, 2024)		
1.25	Design & Develop Dedicated Website	172.00	215.00
0.25	Publish Notice	325.00	81.25
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
19,708.21	Monthly IVR Minutes	0.19	3,744.56
161.75	Class Member Communications	74.00	11,969.50
1.25	Manage Settlement Fund	160.00	200.00
	Process Forms		
14,296	Online Claims	0.95	13,581.20
1,468	Paper Claims	5.95	8,734.60
415.5	Project Oversight/ Database Management	154.00	63,987.00
	Expenses:		
	OCF Hosting	1,135.55	1,135.55
	Copy Charges	235.75	235.75
	Supplies	17.18	17.18
2	PO Box	175.00	350.00
	Box Storage	221.91	221.91

Invoice Total

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
1/24/2025	173995

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
43,771,558	Electronic Data Storage (65% Discount)	0.002	87,543.12
61,858	Fraudulent Claims Prevention Tool	0.0018	111.34
	Postage	17.25	17.25
	Translation	26.35	26.35

	Invoice Total \$192,346.56
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Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101	Total Balance Due \$2,172,797.78
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CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
2/20/2025	174118

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (January 1 - 31, 2025)		
67	Call Center	78.00	5,226.00
1	Monthly TFN Hosting	175.00	175.00
28,031.51	Monthly IVR Minutes	0.19	5,325.99
185.75	Class Member Communications	69.00	12,816.75
	Process Forms		
14,527	Online Claims	0.95	13,800.65
3,961	Paper Claims	5.95	23,567.95
486	Project Oversight/ Database Management	154.00	74,844.00
	Expenses:		
	OCF Hosting	1,121.00	1,121.00
	Copy Charges	260.25	260.25
	Supplies	18.64	18.64
2	PO Box	175.00	350.00
	Box Storage	229.76	229.76
43,803,840	Electronic Data Storage (65% Discount)	0.002	87,607.68
105,492	Fraudulent Claims Prevention Tool	0.0018	189.89
	Postage	10.35	10.35

Invoice Total \$225,543.91

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,172,797.78



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
3/20/2025	174397

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (February 1 - 28, 2025)		
10.75	Case Website with Online Filing	204.00	2,193.00
187	Call Center	77.00	14,399.00
1	Monthly TFN Hosting	175.00	175.00
17,225.63	Monthly IVR Minutes	0.19	3,272.87
149	Class Member Communications	73.00	10,877.00
	Process Forms		
35,038	Online Claims	0.95	33,286.10
155,912	Bulk Claims	0.95	148,116.40
1,967	Paper Claims	5.95	11,703.65
0.5	Tax Reporting	395.00	197.50
470	Project Oversight/ Database Management	142.00	66,740.00
	Expenses:		
	OCF Hosting	759.86	759.86
	Copy Charges	760.25	760.25
	Supplies	139.31	139.31
2	PO Box	175.00	350.00
	Box Storage	300.94	300.94
43,962,728	Electronic Data Storage (65% Discount)	0.002	87,925.46

Invoice Total

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



CLASS ACTION
ADMINISTRATION

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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
3/20/2025	174397

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
239,539	Fraudulent Claims Prevention Tool	0.0018	431.17
	Postage	27.50	27.50
	Translation	82.45	82.45

	Invoice Total \$381,737.46
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Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101	Total Balance Due \$2,172,797.78
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CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/30/2025	174732

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (March 1 - 31, 2025)		
30.75	Case Website with Online Filing	228.00	7,011.00
939	Call Center	68.00	63,852.00
1	Monthly TFN Hosting	175.00	175.00
27,903.15	Monthly IVR Minutes	0.19	5,301.60
988.75	Class Member Communications	68.00	67,235.00
9,860,328	Email Notice Sent Email	0.006	59,161.97
81,456	Process Forms Online Claims	0.95	77,383.20
43,317	Bulk Claims	0.95	41,151.15
1,798	Paper Claims	5.95	10,698.10
3.5	Tax Reporting	288.00	1,008.00
914	Project Oversight/ Database Management	137.00	125,218.00
	Expenses:		
	OCF Hosting	3,011.69	3,011.69
	Copy Charges	765.25	765.25
	Supplies	136.62	136.62

	Invoice Total
--	---------------

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



CLASS ACTION
ADMINISTRATION

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1201 2nd Ave., Suite 3400
Seattle, WA 98101
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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/30/2025	174732

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
2	PO Box	175.00	350.00
	Box Storage	311.95	311.95
44,535,949	Electronic Data Storage (65% Discount)	0.002	89,071.90
710,776	Fraudulent Claims Prevention Tool	0.0018	1,279.40
	Postage	115.98	115.98
	Translation	51.00	51.00
	Address Research	1.00	1.00

Invoice Total \$553,289.81

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,172,797.78



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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
5/15/2025	174771

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (April 1 - 30, 2025)		
9.5	Case Website with Online Filing	212.00	2,014.00
822.25	Call Center	74.00	60,846.50
1	Monthly TFN Hosting	175.00	175.00
49,700.78	Monthly IVR Minutes	0.19	9,443.15
860.75	Class Member Communications	70.00	60,252.50
88.5	Email Notice	112.00	9,912.00
21,619,978	Sent Email	0.006	129,719.87
	Process Forms		
195,548	Bulk Claims	0.95	185,770.60
3,745	Paper Claims	5.95	22,282.75
9,590	Ai Document Review	0.50	4,795.00
11.5	Tax Reporting	119.00	1,368.50
1,180	Project Oversight/ Database Management	146.00	172,280.00
	Expenses:		
	OCF Hosting	4,453.93	4,453.93
	Copy Charges	861.00	861.00
	Supplies	201.38	201.38

Invoice Total

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
5/15/2025	174771

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
2	PO Box	175.00	350.00
	Box Storage	255.00	255.00
46,185,670	Electronic Data Storage (65% Discount)	0.002	92,371.34
949,117	Fraudulent Claims Prevention Tool	0.0018	1,708.41
	Postage	633.76	633.76
	Translation	78.20	78.20
	Address Research	79.95	79.95
	USPS	27.20	27.20
20	Tax Filing Fees (2024)	3,000.00	60,000.00

Invoice Total \$819,880.04

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,172,797.78

**SUBMITTED IN CAMERA
AND UNDER SEAL
OCTOBER 29, 2025**



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
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800.207.7160
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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
2/21/2024	171058

PROJECT	TERMS
NA2 - Moehrl v. The National Association	Deferred

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (Inception - January 31, 2024)		
2	Case Website	210.00	420.00
	Publish Notice Summary Notice Publication	4,325.00	4,325.00
2.25	Call Center	125.00	281.25
5,139,481	Print and Mail Notice		
13,608,182	Mail Postcard	0.07	359,763.67
	Email Short Form Notice	0.006	81,649.09
51.75	Project Management	265.00	13,713.75
5,139,481	Expenses: Postcard Postage	0.357	1,834,794.72

Invoice Total \$2,294,947.48

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,996,807.75



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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/15/2024	171400

PROJECT			TERMS
NA2 - Moehrl v. The National Association			Deferred
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (February 1 - 29, 2024)		
4	Publish Notice	275.00	1,100.00
	Summary Notice Publication	4,325.00	4,325.00
2.75	Call Center	65.00	178.75
	Monthly TFN Hosting	175.00	175.00
6,670.91	Monthly IVR Minutes	0.19	1,267.47
16.25	Email Notice	143.00	2,323.75
1,381,671	Print and Mail Notice		
	Estimated Reminder Postcard Printing	0.075	103,625.33
8.75	Format/Quality Review Notice Packet	124.00	1,085.00
93.5	Project Management	173.00	16,175.50
	Expenses:		
5,139,481	Postcard Postage	0.35577	1,828,473.16
5,139,481	Credit for Prebilled Postcard Postage	-0.357	-1,834,794.72
1,381,671	Estimated Reminder Postcard Postage	0.35755	494,016.47
	Copy Charges	72.00	72.00
	Travel Expenses	1,161.26	1,161.26
	Supplies	3.60	3.60
	Postage	21.12	21.12
Invoice Total			
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/15/2024	171400

PROJECT	TERMS
NA2 - Moehrl v. The National Association	Deferred

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
6,264,405	Electronic Data Storage (65% Discount)	0.002	12,528.81

	Invoice Total \$631,737.50
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Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101 [REDACTED]	Total Balance Due \$2,996,807.75
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CLASS ACTION
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Class Action Administration LLC
1201 2nd Ave., Suite 3400
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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/29/2024	171571

PROJECT			TERMS
NA2 - Moehrl v. The National Association			Deferred
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (March 1 - 31, 2024)		
7.75	Call Center	74.00	573.50
1	Monthly TFN Hosting	175.00	175.00
10,664.49	Monthly IVR Minutes	0.19	2,026.25
36.25	Email Notice	155.00	5,618.75
134,102	Email Short Form Notice	0.006	804.61
	Print and Mail Notice		
396,770	Process Undeliverables	0.05	19,838.50
34,818	Forward Notices	0.06	2,089.08
59	Project Management	113.00	6,667.00
	Expenses:		
	Copy Charges	125.00	125.00
	Supplies	10.75	10.75
	Postage	345.55	345.55
6,315,771	Electronic Data Storage (65% Discount)	0.002	12,631.54
1	PO Box	175.00	175.00
Invoice Total			\$51,080.53
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due
			\$2,996,807.75



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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
5/30/2024	171774

PROJECT	TERMS
NA2 - Moehrl v. The National Association	Deferred

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (April 1 - 30, 2024)		
7.75	Call Center	65.00	503.75
1	Monthly TFN Hosting	175.00	175.00
11,511.69	Monthly IVR Minutes	0.19	2,187.22
	Print and Mail Notice Packet		
7,945	Process Undeliverables	0.05	397.25
34.25	Project Management	79.00	2,705.75
	Expenses:		
	Supplies	81.15	81.15
	Postage	113.17	113.17
6,351,976	Electronic Data Storage (65% Discount)	0.002	12,703.95
1	PO Box	175.00	175.00

Invoice Total \$19,042.24

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$2,996,807.75



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PAID
07/18/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
1/24/2024	170831

PROJECT			TERMS
NAR - National Association of Realtors Se			Settlement Fund
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Postcard Notice Prebill		
10,200,000	Estimated Color Postcard Printing	0.07	714,000.00
10,200,000	Estimated Postcard Postage	0.357	3,641,400.00
Invoice Total			\$4,355,400.00
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101 			



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07/18/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
2/21/2024	171057

PROJECT	TERMS
NAR - National Association of Realtors Se	Deferred

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (Inception - January 31, 2024)		
359.75	Design & Develop Dedicated Website	210.00	75,547.50
106	Publish Notice	230.00	24,380.00
	Top Class Action Sponsorship	12,500.00	12,500.00
	ClassAction.org Sponsorship	10,000.00	10,000.00
	Google, OMTD, Facebook	206,554.00	206,554.00
	Better Homes & Garden	110,000.00	110,000.00
	National Hispanic Newslne	3,280.00	3,280.00
1	IVR Setup	2,500.00	2,500.00
	Email Notice		
21,890,754	Email Append	0.03	656,722.62
27,104,112	Email Short Form Notice	0.006	162,624.67
	Print and Mail Notice		
10,406,309	Scratched Postcard	0.05	520,315.45
206,670	Additional Postcard Notice	0.07	14,466.90
15	Format/Quality Review Notice Packet	150.00	2,250.00
739	Project Oversight	245.00	181,055.00

	Invoice Total
--	---------------

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
2/21/2024	171057

PROJECT	TERMS
NAR - National Association of Realtors Se	Deferred

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
6	Expenses: PO Box Domain Registration OCF Hosting Copy Charges Travel to QA Notice Mailing Case Website Vulnerability Scan Translation Data Axle -US Consumer Data List Core Logic Expense to obtain owner transaction data Additional Postage for 206,670 Postcard Notices	 175.00 670.64 439.85 11.00 2,884.10 4,720.00 2,104.19 203,962.50 82,687.50 110,626.56	 1,050.00 670.64 439.85 11.00 2,884.10 4,720.00 2,104.19 203,962.50 82,687.50 110,626.56

Invoice Total \$2,391,352.48

Payment Instructions

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Total Balance Due

\$487,978.44



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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/15/2024	171399

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (February 1 - 29, 2024)		
58.25	Design & Develop Dedicated Website	214.00	12,465.50
47.25	Publish Notice	269.00	12,710.25
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
37,405.83	Monthly IVR Minutes	0.19	7,107.11
67.25	Email Communications	86.00	5,783.50
116.75	Email Notice	251.00	29,304.25
27,211,852	Email Short Form Notice	0.006	163,271.11
27,104,112	Credit for Prebilled Email Short Form Notice	-0.006	-162,624.67
	Print and Mail Notice		
7.25	Format/Quality Review Notice Packet	137.00	993.25
0.75	Track Undeliverables / Process Forwards	135.00	101.25
3,533,522	Estimated Reminder Postcard Printing	0.075	265,014.15
352.75	Project Oversight	188.00	66,317.00

	Invoice Total
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101	Total Balance Due



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07/18/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/15/2024	171399

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
1	Expenses:		
	PO Box	175.00	175.00
	OCF Hosting	1,825.50	1,825.50
	Copy Charges	801.75	801.75
	Travel to QA Notice Mailing	4,398.51	4,398.51
	Case Website Vulnerability Scan	4,720.00	4,720.00
	Translation	253.75	253.75
	Postage	234.21	234.21
	Supplies	25.91	25.91
31,322,028	Electronic Data Storage (65% Discount)	0.002	62,644.06
1	Box Storage	2.50	2.50
	AWS	13.76	13.76
3,533,522	Estimated Reminder Postcard Postage	0.36	1,272,067.92

Invoice Total \$1,747,780.57

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$487,978.44



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07/18/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/29/2024	171572

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (March 1 - 31, 2024)		
26	Design & Develop Dedicated Website	206.00	5,356.00
29.75	Publish Notice	270.00	8,032.50
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
42,729.9	Monthly IVR Minutes	0.19	8,118.68
130.75	Monitor Inboxes for Exclusions/Objections/Claim Form Submissions	78.00	10,198.50
47.75	Front Desk Inquiries	108.00	5,157.00
22.25	Handling Class Member Notice and Claim Form Requests	65.00	1,446.25
49.25	Email Notice	158.00	7,781.50
5,033,446	Email Short Form Notice	0.006	30,200.68
	Print and Mail Notice		
478,357	Address Research	0.03	14,350.71
711,573	Process Undeliverables	0.05	35,578.65
60,556	Mail Forwards	0.06	3,633.36
361	Project Oversight	235.00	84,835.00

Invoice Total

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



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ADMINISTRATION

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1201 2nd Ave., Suite 3400
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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/29/2024	171572

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
1	Expenses:		
	PO Box	175.00	175.00
	OCF Hosting	5,403.78	5,403.78
	Copy Charges	2,351.75	2,351.75
	Travel to QA Notice Mailing	2,418.91	2,418.91
	Postage	685.12	685.12
	Supplies	92.93	92.93
31,578,857	Electronic Data Storage (65% Discount)	0.002	63,157.71
9	Box Storage	2.50	22.50
	AWS	15.41	15.41
3,533,522	Credit for Prebilled Postcard Postage	-0.36	-1,272,067.92
3,533,522	Postcard Postage	0.36219	1,279,806.33

Invoice Total \$296,925.35

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$487,978.44



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Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
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07/18/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
5/30/2024	171773

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (April 1 - 30, 2024)		
60.5	Design & Develop Dedicated Website	207.00	12,523.50
24.75	Publish Notice	219.00	5,420.25
	CAFA	2,750.00	2,750.00
1	Call Center	175.00	175.00
53,106.41	Monthly TFN Hosting	0.19	10,090.22
	Monthly IVR Minutes		
191.5	Monitor Inboxes for Exclusions/Objections/Claim Form Submissions	87.00	16,660.50
31	Handling Class Member Notice and Claim Form Requests	65.00	2,015.00
	Print and Mail Notice Packet		
29,763	Process Undeliverables	0.05	1,488.15
629.25	Project Oversight	165.00	103,826.25
	Expenses:		
	OCF Hosting	4,762.88	4,762.88
	Copy Charges	942.50	942.50

	Invoice Total
--	---------------

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



CLASS ACTION
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07/18/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
5/30/2024	171773

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Postage	500.53	500.53
	Supplies	240.61	240.61
2	PO Box	175.00	350.00
	AWS	12.15	12.15
17	Box Storage	2.50	42.50
31,759,878	Electronic Data Storage (65% Discount)	0.002	63,519.76

Invoice Total \$225,319.80

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$487,978.44



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07/18/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
6/21/2024	171856

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (May 1 - 31, 2024)		
6.5	Design & Develop Dedicated Website	189.00	1,228.50
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
18,829.68	Monthly IVR Minutes	0.19	3,577.64
29.75	Class Member Communications	126.00	3,748.50
93.75	Monitor Inboxes for Exclusions/Objections/Claim Form Submissions	81.00	7,593.75
8	Handling Class Member Notice and Claim Form Requests	65.00	520.00
	Print and Mail Notice		
1,290	Mail Forwards	0.06	77.40
	Process Forms		
8,038	Paper Claims	5.95	47,826.10
210,629	Online Claims	0.95	200,097.55
836.75	Project Oversight	131.00	109,614.25
	Expenses:		

	Invoice Total
--	---------------

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



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07/18/2024

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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
6/21/2024	171856

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	OCF Hosting	2,302.75	2,302.75
	Copy Charges	1,831.75	1,831.75
	Postage	68.16	68.16
	Supplies	79.10	79.10
2	PO Box	175.00	350.00
25	Box Storage	2.50	62.50
	Amazon Web Services	2.99	2.99
39,253,464	Electronic Data Storage (65% Discount)	0.002	78,506.93

Invoice Total \$457,662.87

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$487,978.44



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PAID
09/23/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
7/11/2024	172020

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Postcard Notice Prebill		
13,800,000	Estimated Postcard Postage	0.384	5,299,200.00
13,800,000	Estimated Postcard Printing	0.07	966,000.00

Invoice Total \$6,265,200.00

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$7,234.32



CLASS ACTION
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09/23/2024

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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
7/29/2024	172145

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (Inception - June 30, 2024)		
22.5	Case Website with Online Filing	197.00	4,432.50
6.75	Publish Notice	221.00	1,491.75
157.75	Project Oversight/ Database Management	204.00	32,181.00

	Invoice Total	\$38,105.25
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$7,234.32



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PAID
09/23/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
8/28/2024	172398

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (July 1 - 31, 2024)		
45.5	Case Website with Online Filing	207.00	9,418.50
43.75	Publish Notice	255.00	11,156.25
	Summary Notice Publication	76,140.00	76,140.00
	CAFA	2,750.00	2,750.00
	Print and Mail Notice Packet		
13,850,045	Notice Printing	0.07	969,503.15
13,800,000	Credit for Prebilled Notice Printing	-0.07	-966,000.00
40.5	Email Notice	124.00	5,022.00
28,991	Sent Email	0.01	289.91
2	Manage Settlement Fund	135.00	270.00
572.5	Project Oversight/ Database Management	196.00	112,210.00
	Expenses:		
1,856,050	Travel Expenses for onsite notice	1,859.68	1,859.68
	Address Research	0.03	55,681.50
	CAFA Postage	1,292.39	1,292.39
	Postage	248.90	248.90
	Supplies	0.14	0.14

Invoice Total

Payment Instructions

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Total Balance Due



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09/23/2024

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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
8/28/2024	172398

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
1	PO Box	175.00	175.00
13,850,045	Postcard Postage	0.3893	5,391,822.52
13,800,000	Credit for Prebilled Postcard Postage	-0.384	-5,299,200.00

Invoice Total \$372,639.94

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$7,234.32



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12/20/2024

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BILL TO
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DATE	INVOICE #
9/23/2024	172605

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (August 1 - 31, 2024)		
0.75	Case Website with Online Filing	395.00	296.25
64	Publish Notice	249.00	15,936.00
	Summary Notice Publication	252,155.00	252,155.00
	Print and Mail Notice Packet		
1,000,000	Notice Printing	0.07	70,000.00
893,437	Track and Research Undeliverable Mail	0.05	44,671.85
121,643	Remail Undeliverables	0.06	7,298.58
65	Email Notice	139.00	9,035.00
25,940,643	Sent Email	0.006	155,643.86
2	Manage Settlement Fund	135.00	270.00
316.25	Project Oversight/ Database Management	165.00	52,181.25
	Expenses:		
531,464	Address Research	0.03	15,943.92
	CAFA Postage	1,408.25	1,408.25
	Postage	346.05	346.05
1	PO Box	175.00	175.00

Invoice Total \$625,361.01

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$7,234.32



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PAID
12/20/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
10/30/2024	172934

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (September 1 - 30, 2024)		
15.75	Case Website with Online Filing	208.00	3,276.00
16	Publish Notice	255.00	4,080.00
	Summary Notice Publication	16,104.00	16,104.00
6.25	Email Notice	147.00	918.75
2,083,637	Sent Email	0.006	12,501.82
120.75	Project Oversight/ Database Management	93.00	11,229.75
	Expenses:		
	Postage	261,994.73	261,994.73
	Supplies	190.78	190.78

Invoice Total \$310,295.83

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$7,234.32



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
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PAID
12/20/2024

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
11/26/2024	173117

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (October 1 - 31, 2024)		
0.5	Case Website with Online Filing	160.00	80.00
47,601	Print and Mail Notice Process Undeliverables	0.05	2,380.05
132.25	Project Oversight/ Database Management	159.00	21,027.75
132,234	Expenses: Postage Supplies	0.40163 21.39	53,109.14 21.39

	Invoice Total	\$76,618.33
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$7,234.32



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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
12/26/2024	173786

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (November 1 - 30, 2024)		
0.75	Case Website with Online Filing	160.00	120.00
6,191	Print and Mail Notice Process Undeliverables	0.05	309.55
11.75	Project Oversight/ Database Management	166.00	1,950.50
	Expenses: Supplies	12.25	12.25

	Invoice Total	\$2,392.30
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$7,234.32



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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
1/24/2025	173997

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (December 1 - 31, 2024)		
328	Print and Mail Notice Process Undeliverables	0.05	16.40
0.75	Manage Settlement Fund	160.00	120.00
24.75	Project Oversight/ Database Management	135.00	3,341.25
	Expenses: Supplies	2.98	2.98

	Invoice Total	\$3,480.63
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$7,234.32



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
2/20/2025	174120

PROJECT	TERMS
NA4 - Gibson et al. v. National Associati	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (January 1 - 31, 2025)		
9	Project Oversight/ Database Management	151.00	1,359.00
	Expenses:		
	Amazon Web Services	2.39	2.39

	Invoice Total	\$1,361.39
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$7,234.32



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PAID
09/23/2024

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
7/11/2024	172018

PROJECT			TERMS
NA3 - Burnett et al. v. The NAR			Settlement Fund
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Postcard Notice Prebill		
13,800,000	Estimated Postcard Postage	0.384	5,299,200.00
13,800,000	Estimated Postcard Printing	0.07	966,000.00
Invoice Total \$6,265,200.00			
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101 [REDACTED]			Total Balance Due \$0.00



CLASS ACTION
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PAID
09/23/2024

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
8/28/2024	172397

PROJECT	TERMS
NA3 - Burnett et al. v. The NAR	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
42.25	Billing Period (Inception - July 31, 2024) Project Management	273.00	11,534.25
1	Expenses: PO Box	175.00	175.00

	Invoice Total	\$11,709.25
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Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101 [REDACTED]	Total Balance Due \$0.00
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PAID
12/12/2024

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
9/23/2024	172604

PROJECT	TERMS
NA3 - Burnett et al. v. The NAR	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (August 1 - 31, 2024)		
198.5	Project Management and Database Support	203.00	40,295.50
31.75	Case Website	145.00	4,603.75
39	Publish Notice	245.00	9,555.00
	Summary Notice Publication	110,625.00	110,625.00
	Print and Mail Notice		
14,500,000	Postcard Printing	0.07	1,015,000.00
13,800,000	Credit for Prebilled Postcard Printing	-0.07	-966,000.00
18.5	Email Notice	163.00	3,015.50
	Expenses:		
1	PO Box	175.00	175.00
	Postage	1,682.04	1,682.04
	Translation	1,563.75	1,563.75
	Travel Expenses	1,430.83	1,430.83
13,979,298	Postcard Postage	0.38624	5,399,364.06
13,800,000	Credit for Prebilled Postcard Postage	-0.384	-5,299,200.00

Invoice Total \$322,110.43

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$0.00



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12/12/2024

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BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
10/30/2024	172932

PROJECT			TERMS
NA3 - Burnett et al. v. The NAR			Settlement Fund
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (September 1 - 30, 2024)		
131.5	Project Management and Database Support	193.00	25,379.50
	Publish Notice		
	Summary Notice Publication	258,344.00	258,344.00
	Email Notice		
26,586,302	Sent Email	0.006	159,517.81
	Print and Mail Notice		
928,595	Process Undeliverables	0.05	46,429.75
116,276	Mail Forwards	0.06	6,976.56
	Expenses:		
	Postage	2.86	2.86
	Travel Expenses	503.86	503.86
80,468	Postcard Postage	0.40179	32,331.24
	Supplies	170.24	170.24
Invoice Total			\$529,655.82
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due
			\$0.00



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12/12/2024

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
12/4/2024	173172

PROJECT	TERMS
NA3 - Burnett et al. v. The NAR	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (October 1 - 31, 2024)		
88.75	Project Management and Database Support	184.66761	16,389.25
	CAFA	2,750.00	2,750.00
	Print and Mail Notice		
200,000	Postcard Printing	0.07	14,000.00
29,980	Process Undeliverables	0.05	1,499.00
3,241	Remail Forwards	0.06	194.46
	Expenses:		
	CAFA Postage	558.96	558.96
622,989	Postcard Postage	0.39769	247,756.50
	Supplies	54.41	54.41
	Address Research	108.90	108.90

Invoice Total \$283,311.48

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$0.00



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12/12/2024

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
12/4/2024	173173

PROJECT	TERMS
NA3 - Burnett et al. v. The NAR	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
66	Email Reminder Notice		
187,989	Opt In Reminder Notice Sent Email	204.20455 0.006	13,477.50 1,127.93

	Invoice Total \$14,605.43
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$0.00



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PAID
03/18/2025

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
12/26/2024	173784

PROJECT	TERMS
NA3 - Burnett et al. v. The NAR	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (November 1 - 30, 2024)		
127	Project Management and Database Support	195.00	24,765.00
8,370	Print and Mail Notice		
223	Process Undeliverables	0.05	418.50
	Remail Forwards	0.06	13.38
	Expenses:		
	Supplies	30.16	30.16
	FedEx	1,048.22	1,048.22

	Invoice Total	\$26,275.26
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Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101	Total Balance Due
	\$0.00



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PAID
03/18/2025

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
12/26/2024	173785

PROJECT			TERMS
NA3 - Burnett et al. v. The NAR			Settlement Fund
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
23,883,242	Email Reminder Notice Opt In Reminder Notice Sent Email	0.006	143,299.45
Invoice Total			\$143,299.45
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101 [REDACTED]			Total Balance Due \$0.00



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PAID
03/18/2025

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
1/24/2025	173996

PROJECT			TERMS
NA3 - Burnett et al. v. The NAR			Settlement Fund
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (December 1 - 31, 2024)		
3,524	Print and Mail Notice		
97	Process Undeliverables	0.05	176.20
	Remail Forwards	0.06	5.82
71.5	Project Management and Database Support	155.00	11,082.50
	Expenses:		
	Supplies	12.72	12.72
	Address Research	4,855.08	4,855.08
Invoice Total			\$16,132.32
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due
			\$0.00



CLASS ACTION
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03/18/2025

Invoice

BILL TO
Hagens Bergman LLP 1301 Second Avenue, Suite 2000 Seattle, WA 98101

DATE	INVOICE #
2/20/2025	174119

PROJECT	TERMS
NA3 - Burnett et al. v. The NAR	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (January 1 - 31, 2025)		
260	Print and Mail Notice		
	Process Undeliverables	0.05	13.00
14	Remail Forwards	0.06	0.84
10	Project Management and Database Support	206.00	2,060.00

	Invoice Total	\$2,073.84
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$0.00



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PAID
08/15/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
12/26/2024	173787

PROJECT	TERMS
NA5 - Gibson - Next Home, Keyes Company,	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (November 1 - 30, 2024)		
	CAFA	2,750.00	2,750.00
1	Publish Notice	210.00	210.00
2	Project Management/Database Support	432.00	864.00
60	Expenses: CAFA Postage	17.21883	1,033.13

	Invoice Total	\$4,857.13
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$43,849.69



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PAID
08/15/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
1/24/2025	173998

PROJECT	TERMS
NA5 - Gibson - Next Home, Keyes Company,	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (December 1 - 31, 2024)		
2	Manage Settlement Fund	126.00	252.00
0.25	Project Management/Database Support	160.00	40.00

	Invoice Total	\$292.00
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$43,849.69



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PAID
08/15/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
2/20/2025	174121

PROJECT	TERMS
NA5 - Gibson - Next Home, Keyes Company,	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (January 1 - 31, 2025)		
8.75	Case Website	148.00	1,295.00
33.75	Project Management/Database Support	254.00	8,572.50

	Invoice Total	\$9,867.50
--	---------------	------------

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$43,849.69



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
2/20/2025	174122

PROJECT	TERMS
NA6 - Keel - Side, Seven Gables, WFP, JPA	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (Inception - January 31, 2025)		
4.75	Case Website	197.00	935.75
	CAFA	2,750.00	2,750.00
27	Project Management	191.00	5,157.00

	Invoice Total	\$8,842.75
--	---------------	------------

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$8,842.75



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PAID
08/15/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
3/20/2025	174398

PROJECT	TERMS
NA5 - Gibson - Next Home, Keyes Company,	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (February 1 - 28, 2025)		
11.25	Case Website	187.00	2,103.75
22	Publish Notice	234.00	5,148.00
	Summary Notice Publication	13,285.00	13,285.00
	Gibson CAFA	2,750.00	2,750.00
	Keel CAFA	2,750.00	2,750.00
9.5	Call Center	196.00	1,862.00
45.75	Email Notice	163.00	7,457.25
5,684	Send Email	0.006	34.10
3	Format/Quality Review Notice Packet	160.00	480.00
9.75	Manage Settlement Fund	136.00	1,326.00
266.25	Project Management/Database Support	205.00	54,581.25
	Expenses:		
	CAFA Postage	3,085.48	3,085.48
	Translation	1,581.25	1,581.25
	Address Research	11,573.91	11,573.91

Invoice Total \$108,017.99

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$43,849.69



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PAID
08/15/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/30/2025	174733

PROJECT	TERMS
NA5 - Gibson - Next Home, Keyes Company,	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (March 1 - 31, 2025)		
13.25	Publish Notice	257.00	3,405.25
	Summary Notice Publication	223,085.00	223,085.00
16.25	Call Center	207.00	3,363.75
	Mail Notice		
27,704	Mail Postcard	0.211	5,845.54
34.25	Email Notice	161.00	5,514.25
18,759,758	Send Email	0.006	112,558.55
156.5	Project Management/Database Support	150.00	23,475.00
	Expenses:		
	CAFA Postage	95.78	95.78
	Address Research	1,573.47	1,573.47
	Class Mailing List	95,241.67	95,241.67
	Postage	11,347.36	11,347.36

Invoice Total \$485,505.62

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$43,849.69



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
5/15/2025	174772

PROJECT	TERMS
NA5 - Gibson - Next Home, Keyes Company,	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (April 1 - 30, 2025)		
11.25	Publish Notice	241.00	2,711.25
	Summary Notice Publication	35,430.00	35,430.00
20,931	Mail Notice		
	Mail Postcard	0.21	4,395.51
63	Email Notice	188.00	11,844.00
6,947,548	Send Email	0.006	41,685.29
50.25	Project Management/Database Support	140.00	7,035.00
	Expenses:		
	Address Research	12,896.88	12,896.88
	Postage	8,999.95	8,999.95

Invoice Total \$124,997.88

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$43,849.69



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
7/1/2025	175129

PROJECT	TERMS
NA5 - Gibson - Next Home, Keyes Company,	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (May 1 - 31, 2025)		
0.5	Publish Notice	275.00	137.50
1.5	Email Notice	135.00	202.50
32,317	Send Email	0.006	193.90
15.5	Project Management/Database Support	209.00	3,239.50

	Invoice Total	\$3,773.40
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$43,849.69



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
7/25/2025	175258

PROJECT	TERMS
NA5 - Gibson - Next Home, Keyes Company,	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (June 1 - 30, 2025)		
0.75	Publish Notice	275.00	206.25
21.5	Project Management/Database Support	177.00	3,805.50

	Invoice Total \$4,011.75
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Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101	Total Balance Due \$43,849.69
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CLASS ACTION
ADMINISTRATION

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PAID
02/24/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
7/29/2024	172144

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (June 1 - 30, 2024)		
9	Design & Develop Dedicated Website	204.00	1,836.00
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
6,984.84	Monthly IVR Minutes	0.19	1,327.12
16.25	Class Member Communications	121.00	1,966.25
25.25	Monitor Inboxes for Exclusions/Objections/Claim Form Submissions	80.00	2,020.00
4.5	Handling Class Member Notice and Claim Form Requests	65.00	292.50
1	Tax Reporting	65.00	65.00
558.5	Project Oversight/ Database Management	136.00	75,956.00
	Expenses:		
	OCF Hosting	959.50	959.50
	Copy Charges	233.25	233.25
	Supplies	32.34	32.34
2	PO Box	175.00	350.00
32	Box Storage	2.50	80.00

	Invoice Total
--	---------------

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

PAID
02/24/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
7/29/2024	172144

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
39,396,930	Electronic Data Storage (65% Discount)	0.002	78,793.86
598,155	Fraudulent Claims Prevention Tool	0.0018	1,076.68

Invoice Total \$165,163.50

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$487,978.44



CLASS ACTION
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Class Action Administration LLC
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02/24/2025

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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
8/28/2024	172396

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (July 1 - 31, 2024)		
6.75	Design & Develop Dedicated Website	162.00	1,093.50
0.5	Publish Notice	325.00	162.50
1	Call Center		
	Monthly TFN Hosting	175.00	175.00
20,775.56	Monthly IVR Minutes	0.19	3,947.36
348.25	Class Member Communications	74.00	25,770.50
51.25	Review and Respond to Class Member Emails	84.00	4,305.00
0.25	Tax Reporting	65.00	16.25
	Process Forms		
11,248	Online Claims	0.95	10,685.60
1,672	Paper Claims	5.95	9,948.40
419.75	Project Oversight/ Database Management	143.00	60,024.25
	Expenses:		
	OCF Hosting	2,097.00	2,097.00
	Copy Charges	1,291.25	1,291.25
	Supplies	6.82	6.82

	Invoice Total
--	---------------

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
8/28/2024	172396

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
2	PO Box	175.00	350.00
	Box Storage	298.58	298.58
39,584,101	Electronic Data Storage (65% Discount)	0.002	79,168.20
345,825	Fraudulent Claims Prevention Tool	0.0018	622.49
	Postage	40.73	40.73
	Translation	121.55	121.55

Invoice Total \$200,124.98

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$487,978.44



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02/24/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
9/23/2024	172603

PROJECT			TERMS
NAR - National Association of Realtors Se			Net 30
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (August 1 - 31, 2024)		
64	Design & Develop Dedicated Website	207.00	13,248.00
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
170,174.85	Monthly IVR Minutes	0.19	32,333.22
3,410.5	Class Member Communications	73.00	248,966.50
6.25	Tax Reporting	158.00	987.50
	Process Forms		
104,441	Online Claims	0.95	99,218.95
3,625	Paper Claims	5.95	21,568.75
758.75	Project Oversight/ Database Management	148.00	112,295.00
	Expenses:		
	OCF Hosting	4,900.03	4,900.03
	Copy Charges	2,694.00	2,694.00
	Supplies	181.79	181.79
2	PO Box	175.00	350.00
	Box Storage	269.32	269.32
42,627,064	Electronic Data Storage (65% Discount)	0.002	85,254.13
641,710	Fraudulent Claims Prevention Tool	0.0018	1,155.08
Invoice Total			
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due



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02/24/2025

DATE	INVOICE #
9/23/2024	172603

Hagens Bergman LLP
One Main Street, Fourth Floor
Cambridge, MA 02142

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

[illegible]**Invoice Total** \$633,955.00

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$487,978.44



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
10/30/2024	172929

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (September 1 - 30, 2024)		
11	Design & Develop Dedicated Website	144.00	1,584.00
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
112,659.58	Monthly IVR Minutes	0.19	21,405.32
1,784.9	Class Member Communications	75.00	133,867.50
2.25	Email Notice	210.00	472.50
	Print and Mail Notice		
193,851	Process Undeliverables	0.05	9,692.55
49,693	Mail Forwards	0.06	2,981.58
0.5	Tax Reporting	325.00	162.50
	Process Forms		
85,372	Online Claims	0.95	81,103.40
2,554	Paper Claims	5.95	15,196.30
1,050	Project Oversight/ Database Management	131.00	137,550.00
	Expenses:		
	OCF Hosting	2,106.28	2,106.28

Invoice Total

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
10/30/2024	172929

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Copy Charges	1,732.50	1,732.50
	Supplies	415.76	415.76
2	PO Box	175.00	350.00
58	Box Storage	2.50	145.00
43,241,142	Electronic Data Storage (65% Discount)	0.002	86,482.28
382,178	Fraudulent Claims Prevention Tool	0.0018	687.92
	Postage	259.21	259.21
	Translation	225.25	225.25

Invoice Total \$496,594.85

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$487,978.44



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
11/26/2024	173118

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (October 1 - 31, 2024)		
12.25	Design & Develop Dedicated Website	157.00	1,923.25
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
50,523.84	Monthly IVR Minutes	0.19	9,599.53
821.5	Class Member Communications	76.00	62,434.00
2.25	Email Notice	187.00	420.75
	Print and Mail Notice		
23,388	Process Undeliverables	0.05	1,169.40
7,978	Mail Forwards	0.06	478.68
1.75	Tax Reporting	65.00	113.75
	Process Forms		
49,203	Online Claims	0.95	46,742.85
2,592	Paper Claims	5.95	15,422.40
817.5	Project Oversight/ Database Management	153.00	125,077.50
	Expenses:		
	OCF Hosting	944.37	944.37

	Invoice Total
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
11/26/2024	173118

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Copy Charges	2,076.25	2,076.25
	Supplies	56.29	56.29
2	PO Box	175.00	350.00
	Box Storage	245.10	245.10
43,489,156	Electronic Data Storage (65% Discount)	0.002	86,978.31
248,571	Fraudulent Claims Prevention Tool	0.0018	447.43
	Postage	111.52	111.52
	Translation	136.00	136.00
	Address Research	13,781.22	13,781.22

Invoice Total \$368,683.60

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$487,978.44



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
12/26/2024	173782

PROJECT			TERMS
NAR - National Association of Realtors Se			Net 30
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (November 1 - 30, 2024)		
1.5	Design & Develop Dedicated Website	160.00	240.00
	Call Center		
1	Monthly TFN Hosting	175.00	175.00
25,240	Monthly IVR Minutes	0.19	4,795.60
409.5	Class Member Communications	79.00	32,350.50
0.25	Tax Reporting	160.00	40.00
	Process Forms		
23,285	Online Claims	0.95	22,120.75
500	Paper Claims	5.95	2,975.00
392.85	Project Oversight/ Database Management	161.00	63,248.85
	Expenses:		
	OCF Hosting	1,643.27	1,643.27
	Copy Charges	488.00	488.00
	Supplies	27.08	27.08
2	PO Box	175.00	350.00
	Box Storage	272.54	272.54
43,661,650	Electronic Data Storage (65% Discount)	0.002	87,323.30
124,844	Fraudulent Claims Prevention Tool	0.0018	224.72
Invoice Total			
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due



PAID
02/24/2025

DATE	INVOICE #
12/26/2024	173782

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

	Invoice Total \$216,313.79
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\$487,978.44



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07/02/2025

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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
1/24/2025	173995

PROJECT			TERMS
NAR - National Association of Realtors Se			Net 30
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (December 1 - 31, 2024)		
1.25	Design & Develop Dedicated Website	172.00	215.00
0.25	Publish Notice	325.00	81.25
1	Call Center		
	Monthly TFN Hosting	175.00	175.00
19,708.21	Monthly IVR Minutes	0.19	3,744.56
161.75	Class Member Communications	74.00	11,969.50
1.25	Manage Settlement Fund	160.00	200.00
	Process Forms		
14,296	Online Claims	0.95	13,581.20
1,468	Paper Claims	5.95	8,734.60
415.5	Project Oversight/ Database Management	154.00	63,987.00
	Expenses:		
	OCF Hosting	1,135.55	1,135.55
	Copy Charges	235.75	235.75
	Supplies	17.18	17.18
2	PO Box	175.00	350.00
	Box Storage	221.91	221.91
Invoice Total			
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
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PAID
07/02/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
1/24/2025	173995

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
43,771,558	Electronic Data Storage (65% Discount)	0.002	87,543.12
61,858	Fraudulent Claims Prevention Tool	0.0018	111.34
	Postage	17.25	17.25
	Translation	26.35	26.35

	Invoice Total \$192,346.56
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Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101	Total Balance Due \$487,978.44
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CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
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07/02/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
2/20/2025	174118

PROJECT			TERMS
NAR - National Association of Realtors Se			Net 30
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (January 1 - 31, 2025)		
67	Call Center	78.00	5,226.00
1	Monthly TFN Hosting	175.00	175.00
28,031.51	Monthly IVR Minutes	0.19	5,325.99
185.75	Class Member Communications	69.00	12,816.75
	Process Forms		
14,527	Online Claims	0.95	13,800.65
3,961	Paper Claims	5.95	23,567.95
486	Project Oversight/ Database Management	154.00	74,844.00
	Expenses:		
	OCF Hosting	1,121.00	1,121.00
	Copy Charges	260.25	260.25
	Supplies	18.64	18.64
2	PO Box	175.00	350.00
	Box Storage	229.76	229.76
43,803,840	Electronic Data Storage (65% Discount)	0.002	87,607.68
105,492	Fraudulent Claims Prevention Tool	0.0018	189.89
	Postage	10.35	10.35
Invoice Total			\$225,543.91
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due
			\$487,978.44



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Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
3/20/2025	174397

PROJECT			TERMS
NAR - National Association of Realtors Se			Net 30
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (February 1 - 28, 2025)		
10.75	Case Website with Online Filing	204.00	2,193.00
187	Call Center	77.00	14,399.00
1	Monthly TFN Hosting	175.00	175.00
17,225.63	Monthly IVR Minutes	0.19	3,272.87
149	Class Member Communications	73.00	10,877.00
35,038	Process Forms		
	Online Claims	0.95	33,286.10
155,912	Bulk Claims	0.95	148,116.40
1,967	Paper Claims	5.95	11,703.65
0.5	Tax Reporting	395.00	197.50
470	Project Oversight/ Database Management	142.00	66,740.00
	Expenses:		
	OCF Hosting	759.86	759.86
	Copy Charges	760.25	760.25
	Supplies	139.31	139.31
2	PO Box	175.00	350.00
	Box Storage	300.94	300.94
43,962,728	Electronic Data Storage (65% Discount)	0.002	87,925.46
Invoice Total			
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
3/20/2025	174397

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
239,539	Fraudulent Claims Prevention Tool	0.0018	431.17
	Postage	27.50	27.50
	Translation	82.45	82.45

Invoice Total \$381,737.46

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$487,978.44



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07/02/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/30/2025	174732

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (March 1 - 31, 2025)		
30.75	Case Website with Online Filing	228.00	7,011.00
939	Call Center	68.00	63,852.00
1	Monthly TFN Hosting	175.00	175.00
27,903.15	Monthly IVR Minutes	0.19	5,301.60
988.75	Class Member Communications	68.00	67,235.00
9,860,328	Email Notice Sent Email	0.006	59,161.97
81,456	Process Forms Online Claims	0.95	77,383.20
43,317	Bulk Claims	0.95	41,151.15
1,798	Paper Claims	5.95	10,698.10
3.5	Tax Reporting	288.00	1,008.00
914	Project Oversight/ Database Management	137.00	125,218.00
	Expenses:		
	OCF Hosting	3,011.69	3,011.69
	Copy Charges	765.25	765.25
	Supplies	136.62	136.62

	Invoice Total
--	---------------

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



CLASS ACTION
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07/02/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/30/2025	174732

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
2	PO Box	175.00	350.00
	Box Storage	311.95	311.95
44,535,949	Electronic Data Storage (65% Discount)	0.002	89,071.90
710,776	Fraudulent Claims Prevention Tool	0.0018	1,279.40
	Postage	115.98	115.98
	Translation	51.00	51.00
	Address Research	1.00	1.00

Invoice Total \$553,289.81

Payment Instructions

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\$487,978.44



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BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
5/15/2025	174771

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (April 1 - 30, 2025)		
9.5	Case Website with Online Filing	212.00	2,014.00
822.25	Call Center	74.00	60,846.50
1	Monthly TFN Hosting	175.00	175.00
49,700.78	Monthly IVR Minutes	0.19	9,443.15
860.75	Class Member Communications	70.00	60,252.50
88.5	Email Notice	112.00	9,912.00
21,619,978	Sent Email	0.006	129,719.87
	Process Forms		
195,548	Bulk Claims	0.95	185,770.60
3,745	Paper Claims	5.95	22,282.75
9,590	Ai Document Review	0.50	4,795.00
11.5	Tax Reporting	119.00	1,368.50
1,180	Project Oversight/ Database Management	146.00	172,280.00
	Expenses:		
	OCF Hosting	4,453.93	4,453.93
	Copy Charges	861.00	861.00
	Supplies	201.38	201.38

Invoice Total

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BILL TO
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DATE	INVOICE #
5/15/2025	174771

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
2	PO Box	175.00	350.00
	Box Storage	255.00	255.00
46,185,670	Electronic Data Storage (65% Discount)	0.002	92,371.34
949,117	Fraudulent Claims Prevention Tool	0.0018	1,708.41
	Postage	633.76	633.76
	Translation	78.20	78.20
	Address Research	79.95	79.95
	USPS	27.20	27.20
20	Tax Filing Fees (2024)	3,000.00	60,000.00

Invoice Total \$819,880.04

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$487,978.44



CLASS ACTION
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Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

PAID
08/05/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
7/1/2025	175128

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (May 1 - 30, 2025)		
27.75	Case Website with Online Filing	195.00	5,411.25
626.25	Call Center	86.00	53,857.50
1	Monthly TFN Hosting	175.00	175.00
31,580.3	Monthly IVR Minutes	0.19	6,000.26
480	Class Member Communications	72.00	34,560.00
7.5	Email Notice	131.00	982.50
1,836	Sent Email	0.006	11.02
	Process Forms		
105,223	Bulk Claims 0 - 500,000	0.95	99,961.85
500,000	Bulk Claims 500,001 - 1,000,000	0.80	400,000.00
500,000	Bulk Claims 1,000,001 - 1,500,000	0.65	325,000.00
317,410	Bulk Claims 1,500,001+	0.50	158,705.00
4,648	Paper Claims	5.95	27,655.60
16,863	Online Claims	0.95	16,019.85
4.5	Tax Reporting	83.00	373.50
1,270.25	Project Oversight/ Database Management	136.00	172,754.00
	Expenses:		

	Invoice Total
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101	Total Balance Due



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
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PAID
08/05/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
7/1/2025	175128

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	OCF Hosting	2,736.39	2,736.39
	Copy Charges	1,771.25	1,771.25
	Supplies	167.83	167.83
2	PO Box	175.00	350.00
	Box Storage	525.62	525.62
47,123,461	Electronic Data Storage (65% Discount)	0.002	94,246.92
342,103	Fraudulent Claims Prevention Tool	0.0018	615.79
	Translation	17.00	17.00
	Address Research	2.00	2.00
	FedEx	1,260.77	1,260.77
	Website Penetration Test	9,440.00	9,440.00

Invoice Total \$1,412,600.90

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$487,978.44



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

PAID
08/05/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
7/25/2025	175259

PROJECT			TERMS
NAR - National Association of Realtors Se			Net 30
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (June 1 - 30, 2025)		
18.75	Case Website with Online Filing	195.00	3,656.25
250	Call Center	78.00	19,500.00
1	Monthly TFN Hosting	175.00	175.00
9,267.43	Monthly IVR Minutes	0.19	1,760.81
183.25	Class Member Communications	72.00	13,194.00
9,527	Process Forms		
4,850	Bulk Claims 1,500,001+	0.50	4,763.50
	Paper Claims	5.95	28,857.50
1.25	Tax Reporting	65.00	81.25
600.5	Project Oversight/ Database Management	161.00	96,680.50
	Expenses:		
	OCF Hosting	840.98	840.98
	Copy Charges	1,557.75	1,557.75
	Supplies	4.80	4.80
2	PO Box	175.00	350.00
	Box Storage	466.58	466.58
47,209,433	Electronic Data Storage (65% Discount)	0.002	94,418.87
9,675	Fraudulent Claims Prevention Tool	0.0018	17.42
Invoice Total			
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

PAID
08/05/2025

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
7/25/2025	175259

PROJECT			TERMS
NAR - National Association of Realtors Se			Net 30
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Tax Consulting	87.00	87.00
Invoice Total			\$266,412.21
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due
			\$487,978.44



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
8/28/2025	175464

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (July 1 - 31, 2025)		
313.5	Call Center	75.00	23,512.50
1	Monthly TFN Hosting	175.00	175.00
9,763.17	Monthly IVR Minutes	0.19	1,855.00
184.75	Class Member Communications	71.00	13,117.25
	Process Forms		
1,237	Paper Claims	5.95	7,360.15
1.75	Tax Reporting	146.00	255.50
432.75	Project Oversight/ Database Management	158.00	68,374.50
	Expenses:		
	OCF Hosting	756.75	756.75
	Copy Charges	173.50	173.50
	Supplies	2.10	2.10
2	PO Box	195.00	390.00
	Box Storage	579.11	579.11
47,245,902	Electronic Data Storage (65% Discount)	0.002	94,491.80
4,504	Fraudulent Claims Prevention Tool	0.0018	8.11
	Translation	45.05	45.05
	Postage	7.20	7.20

Invoice Total \$211,103.52

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$487,978.44



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
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www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
9/24/2025	175613

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (August 1 - 31, 2025)		
4	Case Website with Online Filing	210.00	840.00
248.75	Call Center	75.00	18,656.25
1	Monthly TFN Hosting	175.00	175.00
8,053.92	Monthly IVR Minutes	0.19	1,530.24
164.75	Class Member Communications	70.00	11,532.50
340	Process Forms Paper Claims	5.95	2,023.00
0.5	Tax Reporting	65.00	32.50
204.5	Project Oversight/ Database Management	141.00	28,834.50
	Expenses:		
	OCF Hosting	767.21	767.21
	Copy Charges	55.50	55.50
	Supplies	1.15	1.15
2	PO Box	195.00	390.00
	Box Storage	356.91	356.91
47,784,878	Electronic Data Storage (65% Discount)	0.002	95,569.76
3,600	Fraudulent Claims Prevention Tool	0.0018	6.48
	Translation	14.45	14.45

Invoice Total

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



Invoice

DATE	INVOICE #
9/24/2025	175613

Invoice Total \$160,801.82	
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\$487,978.44



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
10/10/2025	175727

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (September 1 - 30, 2025)		
2.75	Case Website with Online Filing	210.00	577.50
257	Call Center	75.00	19,275.00
1	Monthly TFN Hosting	175.00	175.00
5,308.96	Monthly IVR Minutes	0.19	1,008.70
163.75	Class Member Communications	68.00	11,135.00
	Process Forms		
304	Paper Claims	5.95	1,808.80
7,537	Online Claims	0.95	7,160.15
4.25	Tax Reporting	146.00	620.50
259.5	Project Oversight/ Database Management	161.00	41,779.50
	Expenses:		
	OCF Hosting	675.17	675.17
	Copy Charges	79.00	79.00
2	PO Box	195.00	390.00
	Box Storage	389.06	389.06
	Electronic Data Storage	30,985.59	30,985.59
3,127	Fraudulent Claims Prevention Tool	0.0018	5.63
	Translation	8.50	8.50

Invoice Total \$116,073.10

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$487,978.44



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
10/10/2025	175728

PROJECT	TERMS
NA7 - William Raveis et al	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (Inception - September 30, 2025)		
5	Publish Notice	239.00	1,195.00
	CAFA	2,750.00	2,750.00
23	Project Management	173.00	3,979.00

	Invoice Total	\$7,924.00
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Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$7,924.00

**SUBMITTED IN CAMERA
AND UNDER SEAL
JANUARY 24, 2026**



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
12/31/2025	176284

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (November 1 - 30, 2025)		
12	Case Website with Online Filing	210.00	2,520.00
6.5	Call Center	114.00	741.00
1	Monthly TFN Hosting	175.00	175.00
6,079.52	Monthly IVR Minutes	0.19	1,155.11
272	Class Member Communications	71.90257	19,557.50
40	Process Forms		
	Paper Claims	5.95	238.00
9,211	Online Claims	0.95	8,750.45
0.25	Tax Reporting	395.00	98.75
198.25	Project Oversight/ Database Management	147.00	29,142.75
	Expenses:		
	OCF Hosting	1,311.53	1,311.53
	Copy Charges	604.50	604.50
2	PO Box	207.00	414.00
135	Box Storage	2.50	337.50
	Electronic Data Storage	13,553.75	13,553.75
26,279	Fraudulent Claims Prevention Tool	0.0018	47.30
	Supplies	8.61	8.61

Invoice Total

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due





CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
1/9/2026	176304

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (December 1 - 31, 2025)		
5.75	Case Website with Online Filing	208.00	1,196.00
10.25	Call Center	118.00	1,209.50
1	Monthly TFN Hosting	175.00	175.00
5,534.29	Monthly IVR Minutes	0.19	1,051.52
272.25	Class Member Communications	71.00	19,329.75
84	Process Forms		
	Paper Claims	5.95	499.80
51,141	Online Claims	0.95	48,583.95
0.5	Tax Reporting	65.00	32.50
381.75	Project Oversight/ Database Management	144.00	54,972.00
	Expenses:		
	OCF Hosting	2,130.37	2,130.37
	Copy Charges	278.50	278.50
2	PO Box	207.00	414.00
	Box Storage	353.58	353.58
	Electronic Data Storage	13,650.03	13,650.03
156,765	Fraudulent Claims Prevention Tool	0.0018	282.18
	Supplies	5.04	5.04

Invoice Total \$144,163.72

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$787,462.58



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
12/31/2025	176285

PROJECT	TERMS
NA7 - William Raveis et al	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (November 1 - 30, 2025)		
6	Publish Notice	226.00	1,356.00
715	Mail Notice Mail Postcard	0.07	50.05
20.25	Email Notice	285.00	5,771.25
24,440,741	Sent Email	0.006	146,644.45
66.25	Project Management	152.00	10,070.00
	Expenses:		
	Postage	535.02	535.02
	Address Research	162.57	162.57
	Translation	1.24	1.24

Invoice Total \$164,590.58

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$177,670.36



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
1/9/2026	176305

PROJECT			TERMS
NA7 - William Raveis et al			Settlement Fund
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (December 1 - 31, 2025)		
0.5	Publish Notice	275.00	137.50
175	Mail Notice Mail Postcard	0.07	12.25
6.25	Email Notice	275.00	1,718.75
34.5	Project Management	176.00	6,072.00
	Expenses:		
	Postage	133.94	133.94
	Address Research	109.38	109.38
	Supplies	5.61	5.61
Invoice Total			\$8,189.43
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due
			\$185,859.79

**SUBMITTED IN CAMERA
AND UNDER SEAL
APRIL 14, 2026**



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
2/26/2026	176650

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (January 1 - 31, 2026)		
4	Call Center	65.00	260.00
1	Monthly TFN Hosting	175.00	175.00
4,392.16	Monthly IVR Minutes	0.19	834.51
230.5	Class Member Communications	70.00	16,135.00
	Process Forms		
1,021	Paper Claims	5.95	6,074.95
1,634	Online Claims	0.95	1,552.30
9	Validate Claims	100.00	900.00
0.5	Track Undeliverables / Process Forwards	90.00	45.00
0.5	Tax Reporting	180.00	90.00
348.75	Project Oversight/ Database Management	128.00	44,640.00
	Expenses:		
	OCF Hosting	796.29	796.29
	Copy Charges	84.50	84.50
2	PO Box	207.00	414.00
139	Box Storage	2.50	347.50
	Electronic Data Storage	13,650.03	13,650.03

Invoice Total

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due





CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
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www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
3/23/2026	176791

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (February 1 - 28, 2026)		
6.25	Call Center	104.00	650.00
1	Monthly TFN Hosting	175.00	175.00
4,432.43	Monthly IVR Minutes	0.19	842.16
227.5	Class Member Communications	71.00	16,152.50
	Process Forms		
10	Paper Claims	5.95	59.50
1,577	Online Claims	0.95	1,498.15
112,182	Bulk Claims	0.50	56,091.00
3.25	Track Undeliverables / Process Forwards	90.00	292.50
2.25	Tax Reporting	300.00	675.00
163.5	Project Oversight/ Database Management	148.00	24,198.00
	Expenses:		
	OCF Hosting	619.79	619.79
	Copy Charges	41.00	41.00
2	PO Box	207.00	414.00
	Box Storage	360.76	360.76
	Electronic Data Storage	13,737.35	13,737.35
2,736	Fraudulent Claims Prevention Tool	0.0018	4.92

Invoice Total

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due



Invoice

DATE	INVOICE #
3/23/2026	176791

[illegible]

\$989,314.26



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/9/2026	176925

PROJECT			TERMS
NAR - National Association of Realtors Se			Net 30
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (March 1 - 31, 2026)		
8.25	Case Website with Online Filing	193.00	1,592.25
1.5	Call Center	65.00	97.50
1	Monthly TFN Hosting	175.00	175.00
4,040.48	Monthly IVR Minutes	0.19	767.69
250.5	Class Member Communications	76.00	19,038.00
1,255	Process Forms Online Claims	0.95	1,192.25
0.25	Track Undeliverables / Process Forwards	180.00	45.00
8.5	Tax Reporting	82.00	697.00
0.25	Validate Tax IDs/ 1099 Reporting	100.00	25.00
173.5	Project Oversight/ Database Management	145.00	25,157.50
	Expenses:		
	OCF Hosting	666.36	666.36
	Copy Charges	107.25	107.25
2	PO Box	207.00	414.00
	Box Storage	388.96	388.96
Invoice Total			
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
4/9/2026	176925

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
1,835	Electronic Data Storage	13,738.60	13,738.60
	Fraudulent Claims Prevention Tool	0.0018	3.30
	Supplies	1.03	1.03
	Postage	29.24	29.24
	Tax Consulting	279.25	279.25

Invoice Total	\$64,415.18
---------------	-------------

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$1,053,729.44



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
2/26/2026	176651

PROJECT			TERMS
NA7 - William Raveis et al			Settlement Fund
HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (January 1 - 31, 2026)		
15.5	Case Website with Online Filing	214.00	3,317.00
2.5	Publish Notice	275.00	687.50
2.5	Email Notice	160.00	400.00
27.25	Project Management	262.00	7,139.50
Invoice Total			\$11,544.00
Payment Instructions Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101			Total Balance Due
			\$197,403.79



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
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accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Hagens Bergman LLP One Main Street, Fourth Floor Cambridge, MA 02142

DATE	INVOICE #
3/23/2026	176792

PROJECT	TERMS
NA7 - William Raveis et al	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (February 1 - 28, 2026)		
10.5	Case Website with Online Filing	215.00	2,257.50
10.25	Project Management	171.00	1,752.75
	Expenses		
	Court Transcript	51.70	51.70

	Invoice Total	\$4,061.95
--	---------------	------------

Payment Instructions

Check: Class Action Administration LLC, 1201 2nd Ave., Suite 3400, Seattle, WA 98101

Total Balance Due

\$201,465.74

An aerial photograph of the Seattle skyline, featuring the Space Needle and various city buildings. A semi-transparent green rectangular overlay covers the lower half of the image, serving as a background for the title and logo.

OCTOBER 20, 2023

CONFIDENTIAL PROPOSAL

Moehrl and Burnett Settlements



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I. INTRODUCTION AND FIRM BACKGROUND

JND Legal Administration ("JND") is pleased to submit this proposal to provide settlement notice program services in the *Moehrl* and *Burnett* matters. We believe we are well suited to handle this engagement based on the vast experience and expertise of our team. We are excited about this potential opportunity to work with you and stand ready to assist.

With over 300 people on staff, JND can handle any size engagement. Our workforce is largely on-site at our state-of-the-art, 35,000 square foot headquarters in Seattle, our 10,000 square foot office in New York, and other operational offices around the country.

JND was founded in 2016 by three industry veterans – Jennifer Keough (J), Neil Zola (N) and David Isaac (D) ("JND Founders") – who collectively have more than 80 years of experience in the fields of law and administration and know, firsthand, the importance of hiring responsive and trustworthy administrators. Throughout their careers the JND Founders have been involved in the most high-profile legal administrations in the Country's history. Among the landmark matters they worked on were the \$20 billion *Gulf Coast Claims Facility* ("GCCF") under Kenneth Feinberg; the \$10 billion *DeepWater Horizon BP Gulf Oil Spill* class action working for Patrick Juneau; and the \$3.4 billion United States Department of Justice *Cobell* Indians settlement, the largest Government class action settlement ever. Bios for the JND Founders are attached as **Exhibit 1**.

JND has built its reputation by handling large, complicated matters efficiently and cost effectively. For example, we are the Court-appointed notice and claims administrator for one of the largest class action settlements ever - the landmark \$2.67 billion *Blue Cross Blue Shield* ("BCBS") antitrust settlement. We have received praise for our work from Edward Gentle, the court-appointed Special Master, who would be happy to provide a strong recommendation for JND. Some of the tasks we handled in that matter include: creating a database with hundreds of millions of pieces of confidential health-related data; mailing over 100 million postcard notices; sending hundreds of millions of email notices and reminders; receiving more than 8 million claims; designing a national media notice program using television, radio, digital and other methods; and staffing a call center with 250 agents during the peak of the notice program.

As administrator for the *Equifax Data Breach* settlement, the largest data breach settlement of all time valued at more than \$1.3 billion, we have: worked with counsel for plaintiffs and defendants, as well as lawyers from the Federal Trade Commission ("FTC"),

Consumer Financial Protection Bureau ("CFPB"), and several State Attorneys General across the country; emailed notice twice to over 140 million class members; received more than 18 million claims; staffed a call center with 500 agents at the peak of call volume; built an interactive website which received over 145 million hits; and distributed hundreds of millions of dollars thus far.

Another large-scale project of ours involves Loblaw, the largest grocery chain in Canada, where JND was hired to oversee all elements of its voluntary \$300 million remediation program related to price-fixing, in which every adult in Canada was eligible. Our custom designed website received more than one million claims in the first 24 hours of that program.

We are administering the *Mercedes-Benz Emissions* settlements valued at \$1.5 billion, as well as many other vehicle related settlements with millions of claimants.

We also just recently implemented the notice plan for *National Football League's "Sunday Ticket" Antitrust Litigation*, transmitting over seven million emails, mailing over one million postcards and implementing a supplemental digital campaign.

To further demonstrate our capabilities, we have attached, as **Exhibit 2**, a chart listing our largest matters by settlement amount.

JND consistently works with the leading law firms in the country on both sides of the aisle and regularly receives various marketplace awards. We have been recognized as a premier claims administrator every year of our existence by leading legal publications including the *National Law Journal*, the *Legal Times* and the *New York Law Journal*. For 2022, JND was named the #1 Class Action Claims Administrator in the U.S. by the national legal community and was inducted into the *National Law Journal* Hall of Fame for having held this title for multiple years. **Indeed, in 2023, readers of the *National Law Journal* again ranked JND the #1 administrator in the country and we received another Hall of Fame award from that publication.**

JND's expertise has also been recognized by Federal Government agencies. We are an approved vendor for the FTC and the Securities and Exchange Commission ("SEC"). We are currently administering some three dozen matters for the FTC and over two dozen matters for the SEC, including the \$455 million *GTV Media Fair Fund*. Very recently, we also became an approved vendor for the CFPB. In addition, JND routinely works on projects involving the Equal Employment Opportunity Commission ("EEOC"),

the Federal Deposit Insurance Corporation ("FDIC"), and the Office of the Comptroller of the Currency ("OCC").

The JND team is prepared to bring our experience to help you navigate any complex issues that arise during this large notice campaign. As demonstrated below, we have the expertise to manage any kind of matter and ensure that each component of a notice program is handled successfully and effectively. JND's rise to prominence in the marketplace was based on its commitment to protecting the interests of its clients and the classes they represent. Our continued adherence to those principles means you can trust that JND will take full responsibility for ensuring that your matter is handled properly and professionally.

What follows is a discussion of JND's experience and expertise with respect to notice campaigns, including the specific noticing question raised in the RFP concerning obtaining class member contact information.

II. JND'S NOTICE CAMPAIGN QUALIFICATIONS

JND is one of the few companies in the country to have two established legal notice experts who have been involved in many landmark cases and whose work has been favorably recognized by courts. Gina Intrepido-Bowden is a leading notice expert who has been involved in the design and implementation of hundreds of legal notice programs reaching class members/claimants throughout the U.S., Canada, and the world, with notice in over 35 languages. Her expert bio is attached as **Exhibit 3**. Gina reports directly to our CEO Jennifer Keough, who is the leading notice and administration expert in our field. In her 20-year career, JND's CEO & President, Jennifer Keough, has provided expert consultation and directly overseen hundreds of projects from notice through distribution. The following are summaries of the key elements of the proposed notice campaign designed under the direction of Gina.

A. DIRECT NOTICE CAMPAIGN

1. JND's Email Notice Process and Experience

JND is the most experienced administrator when it comes to performing email notice, having conducted hundreds of email campaigns, including some of the largest on record. For example, in both the *BCBS* and *Equifax* matters we successfully delivered

hundreds of millions of emails to class members. We have also delivered millions of emails in each of the *Intuit Free File Litigation*, *David M. Swinton v. SquareTrade, Inc.*, *National Football League's "Sunday Ticket" Antitrust Litigation*, *Yates v. Checkers, King, et al. v. Bumble Trading Inc., et al.* cases to name a few.

Our in-house process uses industry-leading solutions to achieve the most efficient email notification campaigns and our data team is staffed with email and software experts who conform the email notice program to the particulars of the case. For each of our programs, we analyze the program's data and monitor the ongoing effectiveness of the notification campaign, adjusting the campaign as needed. These actions ensure the highest possible deliverability of the email campaign so that more potential Class Members receive notice.

In all our cases, JND works with counsel to craft the email notice, avoiding spam language to improve deliverability. Our emails are run through spam testing software, DKIM, for sender identification and authorization, and hostname evaluation. Additionally, we check the send domain against the 25 most common IPv4 blacklists.

Our standard process utilizes a verification program to eliminate invalid email and spam traps that would otherwise negatively impact deliverability. We then evaluate and refine the list of email addresses for formatting issues and incomplete addresses to further identify all invalid email addresses. The email content is formatted and structured in a way that receiving servers expect, allowing the email to pass easily to the recipient.

Rather than using attachments, which can send an email right to spam, our email notices provide direct links to the case website for more detailed information. In addition, the use of all capitalization, exclamation points, colored font, case-caption boxes, excessive legalese, and common trigger words are avoided to reduce spam. The email subject line identifies the Defendant and the nature of the content. The class member's name will be included as the email opener to authenticate and personalize the email.

To ensure readability of the email notice, our team reviews and formats the body content into a structure that is applicable to all email platforms. Before commencing the email notice campaign, we send a test email to multiple ISPs and open the email on multiple devices (iPhones, Android phones, desktop computers or laptops, tablets, etc.) to ensure the email opens as expected. Additionally, JND will include an "unsubscribe" link at the bottom of the email notice for Class Members to opt out of any additional email notices from JND. This step is essential to maintain JND's good reputation among

the ISPs and reduce complaints relating to the email campaign. JND will also work with Counsel to identify email phishing campaigns and fraudulent websites and will notify Counsel of fraud schemes as soon as discovered. Emails that are returned to JND are characterized as either "Soft Bounces" or "Hard Bounces." Hard Bounces are when the ISP rejects the email due to a permanent reason such as the email account is no longer active. Soft Bounces are when the email is rejected for temporary reasons, such as the recipient's email address inbox is full. When an email is returned due to a soft bounce, JND attempts to re-email the email notice up to three additional times in an effort to secure deliverability. The email is considered undeliverable if it is a Hard Bounce or a Soft Bounce that is returned after a third resend. For those email notices that are deemed ultimately undeliverable, we typically follow up with a postcard mailing to the extent that a mailing address is available, and a postcard mailing has not already been sent.

2. JND's Postcard Notice Process and Experience

JND's experience with sending mailed notice is unrivaled. For the *BCBS* settlement, we mailed over 100 million postcard notices to class members, one of the largest notice mailings in the history of class action administration. We have performed postcard mailings in more than a hundred of our cases. A postcard notice is a court-approved and cost-effective way to deliver notice and it satisfies due process.¹

JND always standardizes and sorts its outgoing mail to achieve and pass on to our clients the greatest postage discounts available. The data will be loaded into a secure database established for the project. Once loaded, we conduct a review of the records and certify the mailing data via the United States Postal Service ("USPS") Coding Accuracy Support System ("CASS") to confirm the consistency and standardization of the contact information in the database. We then further verify the mailing addresses through the USPS National Change of Address ("NCOA") database to ensure that the database reflects the most recent addresses for members of the class who may have moved within the last four years. JND finalizes the initial mailing list by analyzing the data to remove duplicates. When mail is returned undeliverable, JND utilizes several advanced level research tools to locate updated addresses. We promptly re-mail notices to the updated addresses, as well

¹ JND handles many administrations that require translations into multiple languages, including Spanish. We can translate all important documents as well as IVR script. We can either provide Spanish translations of every document that we send to Class Members, or we can ask Class Members to indicate their language preference via their replies to email notifications. Our database will flag each request accordingly, so that all further communication is in the requested language. Further, we suggest posting translated documents on the case website, which will be easily accessed online, including on Class Members' mobile devices.

as to any forwarding addresses provided on the USPS return labels. All updated addresses are captured in the database for any potential future communications.

B. OBTAINING CLASS MEMBER CONTACT INFORMATION

JND is adept at identifying potential class members through third-party data sources. For example, in connection with our extensive automobile case experience, we worked with departments of motor vehicles throughout the country to gather contact information related to Vehicle Identification Numbers ("VINs"). We did so for more than 30 million VINs in the \$120 million GM ignition switch settlement, as well as in cases involving Navistar, Ford, Mercedes, Subaru, BMW and others.

We have also identified class members through purchased contact lists from other third-party data sources and have used such lists for several notice programs, including the following:

- *Bruzek v. Husky Oil Operations Ltd.*, Case No. 18-cv-00697 (W.D. Wis.) – JND purchased a list and sent direct notice to individuals residing in the affected zip codes.
- *FTC v. Reckitt Benckiser Grp. PLC*, Case No. 10CV00028 (W.D. Va.) – JND purchased a list and sent an outreach notice effort to substance abuse, drug abuse, and addiction treatment centers nationwide.
- *Blue Cross Blue Shield Antitrust Litigation*, Case No. 13-CV-20000-RDP (N.D. Ala.) – JND purchased a list and sent direct notice to HR/employment benefit employees, and other relevant job titles.

1. Email Append

With respect to email notice, JND is the most experienced administrator in the country when it comes to performing email append procedures. Through our proprietary relationship with certain credit bureaus, we are also able to search for the most current email addresses using class member name and postal address information. We have done so successfully in many cases, including *BCBS*, *National Football League's "Sunday Ticket" Antitrust Litigation*, *Hill-Green v. Experian Information Solutions* and dozens of others. Sending email notice to current email addresses will reduce the number of email bounce backs which also, in turn, should help drive the claims rate.

2. Reverse Look-Up

In this specific case, because the likelihood of stale postal addresses is high due to the nature of the case and the dates involved, JND recommends potentially performing a reverse lookup of physical addresses prior to mailing the postcard notice. Through our standard NCOA search, discussed above, we would be able to obtain current addresses for anyone who has moved and filed a change of address form with the USPS within the last four years. Since the class period dates as far back as 2014, it is likely that, after applying the results of the NCOA search, a substantial number of addresses may still be stale, and a reverse lookup by name and available email address would be beneficial for obtaining updated addresses. Credit bureaus are the best source of individual's address history and through our credit bureau relationships, we would be able to perform a reverse lookup as well as search for current mailing addresses based upon class member name and the address of the class member's sold property or any other address that may be provided by the defendants. We believe that performing the NCOA searches, reverse lookups and name/address lookups would be the best way to obtain current addresses and greatly reduce the volume of returned mail which, in turn, would help drive the claims rate.

C. PUBLICATION NOTICE

Due to the expected unreliability of postal address data, a robust publication plan is anticipated. To that end, JND proposes a notice campaign consisting of both targeted digital media and print efforts, depending on the ultimate direct notice volume.

Assuming a direct notice to 1 million class members, JND recommends a targeted effort consisting of a popular consumer magazine (*Better Homes & Gardens*), the leading digital network (Google Display Network – "GDN"), the top social media platform (Facebook), and a respected programmatic partner (OMTD). Approximately 311 million digital impressions will be served over six weeks to adults 35 years of age or older with focused targeting included.² A portion of the GDN impressions will target homeowners and/or users who have searched on Google for key terms such as Burnett MLSs, Moehrl MLSs, Three MLSs, MLS PIN, Five MLSs, Bright MLS, Six MLSs, Four MLSs and My Florida Regional. A portion of the Facebook impressions will target users who recently moved or

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

expressed an interest in homeowner association, moving company or real estate. All of the programmatic impressions on OMTD will target users based on “length of residency” being between 3-10 years and those who are likely homeowners.

In addition to the digital media effort, JND proposes notice placement in one print magazine, *Better Homes & Gardens* to extend reach to all Class Members, particularly those who may not frequent the internet. To further extend reach and notice exposure, JND also proposes several additional notice options such as an internet search campaign, a national press release, and sponsorships with popular class action websites.

Assuming a direct notice to 5 million class members, JND recommends a targeted digital effort only, the same as the digital effort proposed for the 1 million direct notice scenario.

Assuming a direct notice to 10 million class members, JND recommends a targeted digital effort only, similar to the digital efforts proposed for the 1 million direct notice and 5 million direct notice scenarios, except serving fewer, 219 million, digital impressions.

In all scenarios, multiple targeting strategies will be used. and the digital activity will be served across all devices (desktop, laptop, tablet and mobile), with an emphasis on mobile devices. The digital ads will link to the case website, where Class Members may access more information about the case, including the long form notice, as well as file a claim electronically.

Details of our proposed Notice Plan are attached as **Exhibit 4**.

D. WEBSITE DEVELOPMENT

JND regularly designs case websites for our clients. Our websites are content neutral and can include static features like notice information, instructions, and frequently asked questions (with optional search functionality), as well as interactive features such as email access to the administrator, a contact form, address update functionality, and other creative and functional elements that facilitate communications. We also routinely establish websites to accommodate multi-lingual classes.

JND’s website development is cutting edge. We design hundreds of sites every year, all of which are ADA-compliant and mobile-enabled. In matters where a high volume of traffic is expected, we build our websites to withstand millions of “hits.” Indeed, as previously mentioned, in *Equifax* our website withstood 145 million hits and did so without any interruption to service.

We build our sites in accordance with industry standard best practices to ensure the security and privacy of information submitted. Secure coding practices and adherence to the Open Web Application Security Project's (OWASP) Top Ten standards are employed throughout the development lifecycle. Penetration testing is also performed to verify the security of the site.

To make sure our sites work as expected, we test them using both automated tools and human assessment to comply with best practices found in Web Content Accessibility Guidelines 2.1 and Section 508 of the federal Rehabilitation Act. Our sites also undergo load testing where the simulated user load is run from multiple geographic regions to assess all layers of the site infrastructure, including networking, application, and data storage layers. Testing is done to exceed thresholds of actual traffic from other large projects. Where necessary, JND also retains a reputable, independent, third-party cybersecurity firm to perform penetration testing on our websites throughout the development and deployment process.

E. CONTACT CENTER SERVICES

JND's contact center uses 24/7 automated IVR platforms in addition to customer service representatives. Our IVR platform can accommodate multiple languages and can handle, essentially, an unlimited number of calls.

JND's goal is to make the website and IVR recordings so comprehensive that people do not need to ask questions. If operators become desired, we can easily accommodate. JND runs its own call centers throughout the country, including a contact center with 100 seats in our Seattle headquarters. Our ability to handle high volumes of calls is not just theoretical but has been put to the test in several large matters including *Blue Cross Blue Shield* where we handled over 1,000,000 calls in five months.

F. DATA SECURITY AND PRIVACY

At JND, the security and privacy of information is paramount, and our systems have been inspected and vetted by third parties, including Equifax who, prior to hiring us, needed to confirm that our data and IT Security controls were more stringent than what they had in place prior to their breach.

Our defense-in-depth approach to security, including but not limited to the technologies, solutions, and controls, listed below, is what sets us apart from our competitors.

Next Generation Firewalls: JND has deployed Palo Alto firewalls throughout our environment and licensed with top-of-the-line security services, such as, Wildfire, DNS Security, Threat Prevention, Advanced URL Filtering, and Panorama.

- **Wildfire:** Provides real-time traffic analysis to detect and prevent the most sophisticated threats to our environment. Wildfire is automatically updated with preventative measures learned from Palo Alto's large customer base thereby protecting our network, within seconds, from threats first identified in other environments across the globe.
- **DNS Security:** Utilizes a cloud-based analytics platform to provide our firewalls with real-time DNS analysis, known signatures to prevent communication with malicious domains, identification of machine-generated domain names, and DNS sinkholing.
- **Threat Prevention:** Going beyond the capabilities of traditional IDS/IPS, Palo Alto's Threat Prevention service provides multiple layers of detection and prevention to detect and block threats including, exploits, malware, malicious URLs and payloads, command and control, ransomware, and spyware.
- **Advanced URL Filtering:** Monitors and controls how users can access the internet by classifying websites according to content and potential risk. In addition to checking URL's against known malicious sites, real-time analysis takes place for each request to identify characteristics associated with suspect sites to proactively block access.
- **Panorama:** Provides comprehensive management and threat protection allowing for rapid identification of anomalous behavior and simplified modification of security rules.

Network Detection and Response (NDR): In addition to the security services offered by our firewalls, JND has in each of our facilities Darktrace appliances which capture, and analyze with behavioral analytics, signature-based detection, and machine learning, all network communication to identify known and unknown attack patterns.

Extended Detection and Response (XDR): JND leverages Microsoft's Defender 365 suite of security solutions to provide identity and access management, endpoint protection, visibility into and control of cloud application services, and to secure email, documents, and collaboration tools.

- **Identity Protection:** Microsoft's Azure Identity Protection monitors all JND Active Directory account usage for risks such as anonymous IP address use, atypical travel, malware-linked IP addresses, leaked credentials, password spray attacks, etc., and performs automatic remediation efforts, such as requiring MFA, password reset, or account locking, when calculated risk reaches a predetermined level.
- **Endpoint Protection:** Deployed to all endpoints, Microsoft's Defender 365 Endpoint Detection and Response (EDR) is centrally managed to prevent disablement and performs real-time, on-demand, and scheduled scans of all systems. Engines, definitions, and signatures are automatically updated whenever updates are available, and in addition to standard scanning, Defender 365 also performs behavioral analysis to block/prevent malicious files and processes proactively and automatically whenever they are detected.
- **Cloud App Security:** Microsoft's Cloud Access Security Broker provides JND with visibility into cloud applications and services and control over how they are used to protect sensitive data and identify behavior related to malware, compromised users, or unapproved applications.
- **Email Security:** To protect against email-based threats, Microsoft's Defender for Office 365 provides robust protection against attacks like phishing and malware. All messages undergo anti-spam, anti-phishing, and anti-malware scanning prior to delivery so suspect messages are blocked or sent to quarantine. To provide an additional layer of protection, delivered messages are also scanned by Safe Links and Safe Attachment to identify and block threats that made it past initial scanning.

Security Information and Event Management (SIEM): All of JND's security tools and systems and audit logs feed data to Microsoft's Sentinel SIEM to provide our team with a single pane of glass through which we gain visibility across the enterprise. Data is collected across all users, devices, applications, and infrastructure, correlated to detect threats to our environment, and used to alert applicable personnel so suspicious activity can be investigated and responded to rapidly.

Defense-in-Depth: At JND, we recognize that an information security program is about more than the tools we've mentioned above and, as such, have put in place a comprehensive set of technical, administrative, and physical controls, some of which are outlined below.

- NIST 800-53 risk management framework and controls
- Stringent onboarding requirements
- Cybersecurity and privacy awareness and training
- Quarterly Access Reviews
- Role-Based access control information processing systems
- Multi-Factor Authentication for all remote access and for local privileged account access
- SOC 2 Certified Datacenter Facility
- Vulnerability and Patch Management programs that include monthly scanning and patch deployment
- Annual Internal, External, and Application penetration testing performed by a reputable, independent, third-party cybersecurity firm
- Physical access controls for all facilities
- CIS-based system hardening baselines
- Systems and processes designed to protect an individuals' privacy

G. PRICING

Attached as **Exhibit 5** is our menu pricing for the settlement notice program outlined in the RFP. Unit charges will remain the same, though volume discounts will be provided where appropriate if volumes are materially higher. Because some items will be charged on an hourly basis, attached as **Exhibit 6** are JND's Hourly Billing Rates. Based on your emails it appears that some components of the notice program are in flux. Once hired, JND is committed to working with you to create the most effective and cost-effective program.

Finally, JND will defer all fees and expenses at this phase. This is something we only do on a project of this size for our best clients. We hope you appreciate this accommodation. However, this does not mean that payment to JND is contingent on a successful outcome of the case. We will expect payment of our invoices even if the matter is dismissed.

III. CONCLUSION

Thank you again for requesting that JND submit a proposal for the *Moehrl* and *Burnett* matters. We are excited about the opportunity and are prepared to begin work immediately. If you have any questions or would like any additional information, please do not hesitate to contact us. We are also available to discuss the proposal and our expertise at your convenience.

— EXHIBIT 1 —
JND Founders

As Chief Executive Officer, Jennifer Keough oversees all of JND's business operations, from day-to-day processes to high-level strategy. She is recognized by practitioners on both sides of the aisle as an expert in all facets of class action administration, from notice through distribution. Jennifer has testified on settlement matters in many courts nationally and before the Senate Committee for Indian Affairs.

With more than 20 years of legal experience, Jennifer has directly worked on hundreds of high-profile and complex administration engagements, including such landmark matters as the \$20 billion Gulf Coast Claims Facility, \$10 billion BP Deepwater Horizon Settlement, \$3.4 billion Cobell Indian Trust Settlement (the largest U.S. government class action settlement ever), \$3.05 billion VisaCheck/MasterMoney Antitrust Settlement, \$1 billion Stryker Modular Hip Settlement, \$600 million Engle Smokers Trust Fund, \$215 million USC Student Health Center Settlement, the Equifax Data Breach Settlement, valued at \$1.3 billion, and countless others.

Jennifer formed JND with her partners in 2016. A few months later she was appointed by the United States District Court for the Northern District of California as the Independent Claims Administrator ("ICA") in a complex BP Solar Panel Settlement. Jennifer oversaw the notice and administration, including the inspection, remediation and replacement of solar panels on homes and businesses throughout the United States. Soon after, Jennifer was also chosen to oversee the Loblaw restitution program in Canada in which every adult in the country was eligible to participate. Since then, she has continued to be appointed notice expert in a number of high-profile matters.

Prior to forming JND, Jennifer was COO and executive vice president for one of the then largest legal administration firms in the country. Previously, she worked as a class action business analyst at Perkins Coie, responsible for managing complex class action settlements and remediation programs, including the selection, retention and supervision of legal administration firms.

In 2017, Jennifer was named a female entrepreneur of the year finalist in the 14th annual Stevie Awards for Women in Business. In 2015 and 2017, she was recognized as a "Woman Worth Watching" by Profiles in Diversity Journal. In 2013, she was featured in a CNN article, "What Changes with Women in the Boardroom." Jennifer is frequently invited to speak on class action issues and has written numerous articles in her areas of expertise. Jennifer earned her B.A., M.S.F. with honors and J.D. from Seattle University.

JENNIFERKEOUGH

CHIEF EXECUTIVE OFFICER, FOUNDER

jennifer.keough@JNDLA.com

www.linkedin.com/in/jennifer-keough



As an Executive Managing Director of JND Legal Administration, Neil has made it his priority to be involved in all aspects of the business, both strategic and operational. At JND he oversees the company's Securities Administration group and has direct involvement in some of the company's largest Consumer, Antitrust and Mass Tort matters including, among many others, the Equifax Data Breach settlement, valued at over \$1.3 billion, and the \$215 million USC Women's Health Center Settlement.

Over the course of his career, Neil has personally handled dozens of the largest legal administration projects in our country's history, including the \$512 million Auction Houses Antitrust Litigation, \$10 billion BP Deepwater Horizon Settlement, \$586 million IPO Securities Litigation, \$3.05 billion Visa/Mastercard Antitrust Litigation and the \$6.15 billion WorldCom Securities Litigation, among many others.

Neil has testified in courts throughout the country on class action settlement matters and has written numerous articles on the subject. He is sought after to consult on a multitude of legal administration matters as well as class action issues, and has been featured on "Worldwide Business" with Kathy Ireland, "Middle Market Executive" Podcast, and USA Weekly.

Prior to forming JND, between 2000 and 2015, Neil held positions as General Counsel, Chief Operating Officer, and President at one of the formerly largest administration firms in the country. Before this, Neil was a partner with a boutique litigation firm in New York City where he handled complex litigation matters for nearly 10 years.

Neil earned his J.D. from UCLA School of Law, where he has served on the board of the Alumni Association and has been a featured speaker in their Distinguished Alumni Lecturer Series. He received his B.A., cum laude, from the University of Pennsylvania.

NEILZOLA

EXECUTIVE MANAGING DIRECTOR,
FOUNDER

neil.zola@JNDLA.com

www.linkedin.com/in/neil-zola-50190026



As an Executive Co-Chairman of JND Legal Administration and a leader in the legal administration business for over 20 years, David is integral in the growth of all aspects of JND.

David is credited with changing the industry landscape by providing “one-stop shopping” service offerings and hiring experienced lawyers to manage settlements and bankruptcies. During the course of the last 20 years David has also managed several historic cases including the American Airlines Bankruptcy, Engle Smokers Trust Fund, GM Bankruptcy and IPO Securities Litigation.

Prior to forming JND, David was the CEO of one of the then largest legal administration firms in the country and was a member of the global executive management team at their parent company. Before entering the legal administration business, David was a practicing class action attorney for a securities class action boutique in New York City.

David earned his J.D. from the Benjamin N. Cardozo School of Law and his B.A. from Yeshiva College. David is currently the vice chairman of the Board of Overseers of the Sy Syms School of Business.

DAVID ISAAC

EXECUTIVE MANAGING DIRECTOR,
FOUNDER

david.isaac@JNDLA.com

www.linkedin.com/in/david-isaac-044a9321



— EXHIBIT 2 —

JND's Largest
Administrations
by Settlement Value

JND'S LARGEST ADMINISTRATIONS BY SETTLEMENT VALUE

CASE NAME	TYPE	CASE NO.	COURT	VALUE
1. <i>Gulf Coast Claims Facility</i>	Mass Tort	2:10-md-02179-CJB-SS	E.D. La.	\$20,000,000,000
2. <i>Deepwater Horizon Gulf Oil Spill Settlement</i>	Mass Tort	MDL-2179	E.D. La.	\$10,000,000,000
3. <i>WorldCom Securities Litigation</i>	Securities	02-cv-3288	S.D.N.Y.	\$6,150,000,000
4. <i>Cobell Indian Trust Settlement</i>	Government	96-cv-1285 (TFH)	D.D.C.	\$3,400,000,000
5. <i>Tyco Securities Litigation</i>	Securities	02-MDL-1335-PB	D.N.H.	\$3,200,000,000
6. <i>Visa MasterCard Antitrust Settlement</i>	Antitrust	96-cv-5238 (JG)	E.D.N.Y.	\$3,050,000,000
7. <i>In re Blue Cross Blue Shield Antitrust Litigation</i>	Antitrust	2:13-cv-20000-RDP	N.D. Ala.	\$2,670,000,000
8. <i>Bank of America Securities Litigation</i>	Securities	09-MDL-2058 (DC)	S.D.N.Y.	\$2,400,000,000
9. <i>Nortel Networks Securities Litigation</i>	Securities	05-MD-1659 (LAP)	S.D.N.Y.	\$2,200,000,000
10. <i>Health Republic Insurance Company v. The United States</i>	Insurance	16-259C	Fed. Cl.	\$1,900,000,000

CASE NAME		TYPE	CASE NO.	COURT	VALUE
11.	<i>Common Ground Healthcare Cooperative v. The United States</i>	Insurance	17-877C	Fed. Cl.	\$1,800,000,000
12.	<i>In re Mercedes-Benz Emissions Litigation</i>	Automotive	16-cv-881	D.N.J.	\$1,500,000,000
13.	<i>In re Equifax Inc. Customer Data Security Breach Litigation</i>	Data Breach	1:17-md-2800-TWT	N.D. Ga.	\$1,300,000,000
14.	<i>Royal Ahold Securities Litigation</i>	Securities	1:03-MD-01539	D. Md.	\$1,100,000,000
15.	<i>In re Stryker Rejuvenate and ABG II Hip Implant Products Liab. Litig.</i>	Mass Tort	MDL 13-2441 (DWF-FLN)	D. Minn.	\$1,000,000,000
16.	<i>Air Cargo Antitrust Settlement</i>	Antitrust	06-MD-1775	E.D.N.Y.	\$853,000,000
17.	<i>Engle Trust Fund</i>	Consumer	94-08273 CA 22	Fla. 11th Jud. Cir. Ct.	\$800,000,000
18.	<i>Bristol Myers Squibb Securities Litigation</i>	Securities	02-cv-2251	S.D.N.Y.	\$750,000,000
19.	<i>IPO Securities Litigation</i>	Securities	1:21-mc-00092	S.D.N.Y.	\$586,000,000
20.	<i>GTV Media Group, Inc. et al Fair Fund</i>	Securities	File No. 3-20537	SEC	\$455,000,000
21.	<i>In re Kraft Heinz Securities Litigation</i>	Securities	1:19-cv-01339	N.D. Ill.	\$450,000,000
22.	<i>Benson, et al. v. DoubleDown Interactive, LLC, et al.</i>	Consumer	18-cv-00525-RSL	W.D. Wash.	\$415,000,000
23.	<i>Loblaw Canadian Remediation Program</i>	Antitrust Remediation	N/A	N/A	\$300,000,000

CASE NAME	TYPE	CASE NO.	COURT	VALUE
24. <i>In re Signet Jewelers Limited Securities Litigation</i>	Securities	1:16-cv-01752 (LLM)	S.D.N.Y.	\$240,000,000
25. <i>Andrews, et al. v. Plains All American Pipeline, L.P., et al.</i>	Environmental	2:15-cv-4113	C.D. Cal.	\$230,000,000
26. <i>USC Student Health Center Litigation</i>	Consumer	2:18-cv-04258-SVW	C.D. Cal.	\$215,000,000
27. <i>Kalra v. Mercedes-Bez Canada, Inc.</i>	Automotive	CV-16-550271-00CP	Ontario Superior Court of Justice, Toronto Region	\$196,457,040
28. <i>In re Snap Inc. Securities Litigation</i>	Securities	2:17-cv-03679-SVW-AGR	C.D. Cal.	\$185,000,000
29. <i>Senne v. Office of the Commissioner of Baseball</i>	Employment	3:14-cv-00608-JCS	N.D. Cal.	\$185,000,000
30. <i>In re Broiler Chicken Antitrust Litigation</i>	Antitrust	1:16-cv-08637	N.D. Ill.	\$169,601,600
31. <i>Pearlstein, et al. v. BlackBerry Ltd., et al.</i>	Securities	1:13-cv-7060	S.D.N.Y.	\$165,000,000
32. <i>Perry Cline, et al. v. Sunoco, Inc.</i>	Oil & Gas	6:17-cv-00313-JAG	E.D. Okla.	\$155,691,486
33. <i>In re Akorn, Inc. Data Integrity Securities Litigation</i>	Securities	1:18-cv-01713	N.D. Ill.	\$155,000,000
34. <i>In re Equifax Inc. Securities Litigation</i>	Securities	1:17-cv-03463-TWT	N.D. Ga.	\$149,000,000
35. <i>Cecil v. BP America Production Company</i>	Oil & Gas	6:16-cv-00410-KEW	E.D. Okla.	\$147,000,000

CASE NAME	TYPE	CASE NO.	COURT	VALUE
36. <i>In re Navistar MaxxForce Engines Marketing, Sales Practices and Products Liability Litigation</i>	Consumer	1:14-cv-10318	N.D. Ill.	\$135,000,000
37. <i>Leonard, et al. v. John Hancock Life Insurance Company of New York, et al.</i>	Insurance	1:18-cv-4994	S.D.N.Y.	\$123,074,128
38. <i>In re General Motors LLC Ignition Switch Litigation</i>	Automotive	14-MD-2543	S.D.N.Y.	\$121,100,000
39. <i>Fitzgerald Farms, LLC v. Chesapeake Operating, Inc.</i>	Oil & Gas	CJ-2010-38	Okla. Dist. Beaver	\$119,000,000
40. <i>Kelly Ellis, et al. v. Google, LLC.</i>	Employment	CGC-17-561299	Cal. Super. San Francisco	\$118,000,000
41. <i>In re Lincoln National COI Litigation; In re Lincoln National 2017 COI Rate Litigation</i>	Insurance	2:16-cv-6605-GJP; 2:17-cv-04150-GJP	E.D. Penn.	\$117,750,000
42. <i>Liang, et al. v. State of Washington Dep't of Social & Health Services, et al.</i>	Employment	20-2-02506-34	Wash. Super. Thurston	\$116,068,000
43. <i>Fresno County Employees Retirement Association, et al. v. comScore Inc., et al.</i>	Securities	1:16-cv-01820-JGK	S.D.N.Y.	\$110,000,000
44. <i>The Erica P. John Fund, Inc., et al. v. Halliburton Company, et al.</i>	Securities	3:02-cv-1152-M	N.D. Tex.	\$100,000,000
45. <i>Lehigh County Employees' Retirement Fund v. Novo Nordisk A/S et al.</i>	Securities	3:17-cv-00209-BRHM-LHG	D.N.J.	\$100,000,000

CASE NAME	TYPE	CASE NO.	COURT	VALUE
46. <i>Stop and Shop Supermarket Company, et al. v. SmithKline Beecham Corp.</i>	Antitrust	2:03-cv-04578-JP	E.D. Penn.	\$100,000,000
47. <i>In re Mattel, Inc. Securities Litigation</i>	Securities	2:19-cv-10860-MCS-PLA	C.D. Cal.	\$98,000,000
48. <i>Cognizant Securities Litigation</i>	Securities	2:16-cv-06509	D.N.J.	\$95,000,000
49. <i>Echard v. Wells Fargo Bank, N.A.</i>	FCRA	2:21-cv-05080-MHW-KAJ	S.D. Ohio	\$94,000,000
50. <i>Hanks v. The Lincoln Life & Annuity Company of New York, et al.</i>	Insurance	1:16-cv-06399-PKC	S.D.N.Y	\$92,500,000

Every single case listed above was handled directly by one of the Founders of JND or by another senior JND employee still working for the company.

— EXHIBIT 3 —
Gina Intrepido-Bowden Bio

GINA INTREPIDO-BOWDEN

VICE PRESIDENT



I.

INTRODUCTION

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

- *Flaum v Doctor’s Assoc., Inc.*, a \$30 million FACTA settlement
- *FTC v. Reckitt Benckiser Grp. PLC*, the \$50 million Suboxone branded drug antitrust settlement
- *In re Blue Cross Blue Shield Antitrust Litig.*, a \$2.67 billion antitrust settlement
- *In re General Motors LLC Ignition Switch Litig.*, the \$120 million GM Ignition Switch economic settlement
- *In re Home Depot, Inc., Customer Data Sec. Breach Litig.*, a security breach impacting over 40 million consumers who made credit/debit card purchases in a Home Depot store
- *In re Monitronics Int’l, Inc.*, a \$28 million TCPA settlement
- *In re Residential Schools Litig.*, a complex Canadian class action incorporating a groundbreaking notice program to remote aboriginal persons qualified to receive benefits in the multi-billion-dollar settlement

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

With more than 25 years of advertising research, planning and buying experience, Gina began her career working for one of New York's largest advertising agency media departments (BBDO), where she designed multi-million-dollar media campaigns for clients such as Gillette, GE, Dupont, and HBO. Since 2000, she has applied her media skills to the legal notification industry, working for several large legal notification firms. Gina is an accomplished author and speaker on class notice issues including effective reach, notice dissemination as well as noticing trends and innovations. She earned a Bachelor of Arts in Advertising from Penn State University, graduating *summa cum laude*.

II.

JUDICIAL RECOGNITION

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

1. Judge Stephen V. Wilson

LSIMC, LLC v. Am. Gen. Life Ins. Co., (June 27, 2023)

No. 20-cv-11518 (C.D. Cal.):

The Court finds that the Settlement Administrator completed the delivery of the Class Notice to Settlement Class Members according to the Agreement terms. The Class Notice complied in all respects with the requirements of Rule 23 and the due process requirements of the United States Constitution and provided due and adequate notice to the Settlement Class.

2. Honorable David O Carter

Gutierrez, Jr. v. Amplify Energy Corp., (April 24, 2023)

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

The Court finds that the Notice ... (a) constitutes the best notice practicable under the circumstances of this Action; (b) constitutes due and sufficient notice to the Classes of the terms of the Settlement Agreement and the Final Approval Hearing; and (c) fully complied with the requirements of the Federal Rules of Civil Procedure, the United States Constitution, and any other applicable law, including the Class Action Fairness Act of 2005, 28 U.S.C. § 1715.

3. Honorable Dana M. Sabraw

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

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

An experienced and well-respected claims administrator, JND Legal Administration LLC ("JND"), administered a comprehensive and robust notice plan to alert Settlement Class Members of the COSI Settlement Agreement...The Notice Plan surpassed the

85% reach goal...The Court recognizes JND's extensive experience in processing claim especially for millions of claimants...The Court finds due process was satisfied and the Notice Program provided adequate notice to settlement class members in a reasonable manner through all major and common forms of media.

4. Judge Fernando M. Olguin

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

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

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

5. Judge Cormac J. Carney

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

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

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

6. Judge David J. Novak

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

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

The Court appoints JND Legal Administration LLC ("JND"), a competent firm, as the Settlement Administrator...The Court approves the Notice Plan, as set forth in...

paragraphs 9-15 and Exhibits B-C of the May 9, 2022 Declaration of Gina Intrepido-Bowden (“Intrepido-Bowden Declaration”).

7. Judge Cecilia M. Altonaga

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

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

8. Judge Victoria A. Roberts

Graham v. Univ. of Michigan, (March 29, 2022)
No. 21-cv-11168-VAR-EAS (E.D. Mich.):

The Court finds that the foregoing program of Class Notice and the manner of its dissemination is sufficient under the circumstances and is reasonably calculated to apprise the Settlement Class of the pendency of this Action and their right to object to the Settlement. The Court further finds that the Class Notice program is reasonable; that it constitutes due, adequate, and sufficient notice to all persons entitled to receive notice; and that it meets the requirements of due process and Federal Rule of Civil Procedure 23.

9. Honorable P. Kevin Castel

Hanks v. Lincoln Life & Annuity Co. of New York, (February 23, 2022)
No. 16-cv-6399 PKC (S.D.N.Y.):

The Court appoints JND Legal Administration LLC (“JND”), a competent firm, as the Settlement Administrator...The form and content of the notices, as well as the manner

of dissemination described below, meet the requirements of Rule 23 and due process, constitute the best notice practicable under the circumstances, and shall constitute due and sufficient notice to all persons and entities entitled thereto.

10. Judge William M. Conley

Bruzek v. Husky Oil Operations Ltd., (January 31, 2022)

No. 18-cv-00697 (W.D. Wis.):

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

11. Honorable Dana M. Sabraw

In re Packaged Seafood Prods. Antitrust Litig. (DPP Class), (January 26, 2022)

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

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

12. Honorable Dana M. Sabraw

In re Packaged Seafood Prods. Antitrust Litig. (EPP Class), (January 26, 2022))

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

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

13. Judge Alvin K. Hellerstein

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

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

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

14. Judge Timothy J. Corrigan

Levy v. Dolgencorp, LLC, (December 2, 2021)

No. 20-cv-01037-TJC-MCR (M.D. Fla.):

No Settlement Class Member has objected to the Settlement and only one Settlement Class Member requested exclusion from the Settlement through the opt-out process approved by this Court...The Notice Program was the best notice practicable under the circumstances. The Notice Program provided due and adequate notice of the proceedings and of the matters set forth therein, including the proposed Settlement set forth in the Agreement, to all persons entitled to such notice. The Notice Program fully satisfied the requirements of the Federal Rules of Civil Procedure and the United States Constitution, which include the requirement of due process.

15. Honorable Nelson S. Roman

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

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

The Notice Plan provided for notice through a nationwide press release; direct notice through electronic mail, or in the alternative, mailed, first-class postage prepaid

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

16. Honorable James V. Selna

Herrera v. Wells Fargo Bank, N.A., (November 16, 2021)

No. 18-cv-00332-JVS-MRW (C.D. Cal.):

On June 8, 2021, the Court appointed JND Legal Administration (“JND”) as the Claims Administrator... JND mailed notice to approximately 2,678,266 potential Non-Statutory Subclass Members and 119,680 Statutory Subclass Members. *Id.* ¶ 5. 90% of mailings to Non-Statutory Subclass Members were deemed delivered, and 81% of mailings to Statutory Subclass Members were deemed delivered. *Id.* ¶ 9. Follow-up email notices were sent to 1,977,514 potential Non-Statutory Subclass Members and 170,333 Statutory Subclass Members, of which 91% and 89% were deemed delivered, respectively. *Id.* ¶ 12. A digital advertising campaign generated an additional 5,195,027 views. *Id.* ¶ 13...Accordingly, the Court finds that the notice to the Settlement Class was fair, adequate, and reasonable.

17. Judge Morrison C. England, Jr.

Martinelli v. Johnson & Johnson, (September 27, 2021)

No. 15-cv-01733-MCE-DB (E.D. Cal.):

The Court appoints JND, a well-qualified and experienced claims and notice administrator, as the Settlement Administrator.

18. Honorable Nathanael M. Cousins

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

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

The Court hereby appoints JND Legal Administration as Settlement Administrator... The Court finds that the proposed notice program meets the requirements of Due Process under the U.S. Constitution and Rule 23; and that such notice program—which includes individual direct notice to known Settlement Class Members via email, mail, and a second reminder email, a media and Internet notice program, and the establishment of a Settlement Website and Toll-Free Number—is the best notice practicable under the circumstances and shall constitute due and sufficient notice to all persons entitled thereto. The Court further finds that the proposed form and content of the forms of the notice are adequate and will give the Settlement Class Members sufficient information to enable them to make informed decisions as to the Settlement Class, the right to object or opt-out, and the proposed Settlement and its terms.

19. Judge Vernon S. Broderick, Jr.

In re Keurig Green Mountain Single-Serve Coffee Antitrust Litig., (June 7, 2021)

No. 14-md-02542 (S.D.N.Y.):

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

20. Honorable Louis L. Stanton

Rick Nelson Co. v. Sony Music Ent., (May 25, 2021)

No. 18-cv-08791 (S.D.N.Y.):

Notice of the pendency of this Action as a class action and of the proposed Settlement was given to all Class Members who could be identified with reasonable effort. The form and method of notifying the Class of the pendency of the action as a class action and of the terms and conditions of the proposed Settlement met the requirements of Rule 23 of the Federal Rules of Civil Procedure, the Class Action Fairness Act of 2005, 28 U.S.C. § 1715, due process, and any other applicable law, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all persons and entities entitled thereto.

21. Honorable Daniel D. Domenico

Advance Trust & Life Escrow Serv., LTA v. Sec. Life of Denver Ins. Co., (January 29, 2021)

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

The proposed form and content of the Notices meet the requirements of Federal Rule of Civil Procedure 23(c)(2)(B)...The court approves the retention of JND Legal Administration LLC as the Notice Administrator.

22. Honorable Virginia A. Phillips

Sonner v. Schwabe North America, Inc., (January 25, 2021)

No. 15-cv-01358 VAP (SPx) (C.D. Cal.):

Following preliminary approval of the settlement by the Court, the settlement administrator provided notice to the Settlement Class through a digital media campaign. (Dkt. 203-5). The Notice explains in plain language what the case is about, what the recipient is entitled to, and the options available to the recipient in connection with this case, as well as the consequences of each option. (Id., Ex. E). During the allotted response period, the settlement administrator received no requests for exclusion and just one objection, which was later withdrawn. (Dkt. 203-1, at 11).

Given the low number of objections and the absence of any requests for exclusion, the Class response is favorable overall. Accordingly, this factor also weighs in favor of approval.

23. Honorable R. Gary Klausner

A.B. v. Regents of the Univ. of California, (January 8, 2021)

No. 20-cv-09555-RGK-E (C.D. Cal.):

The parties intend to notify class members through mail using UCLA's patient records. And they intend to supplement the mail notices using Google banners and Facebook ads, publications in the LA times and People magazine, and a national press release. Accordingly, the Court finds that the proposed notice and method of delivery sufficient and approves the notice.

24. Judge Jesse M. Furman

In re General Motors LLC Ignition Switch Litig., economic settlement, (December 18, 2020)

No. 2543 (MDL) (S.D.N.Y.):

The Court finds that the Class Notice and Class Notice Plan satisfied and continue to satisfy the applicable requirements of Federal Rules of Civil Procedure 23(c)(2)(b) and 23(e), and fully comply with all laws, including the Class Action Fairness Act (28 U.S.C. § 1711 et seq.), and the Due Process Clause of the United States Constitution (U.S. Const., amend. V), constituting the best notice that is practicable under the circumstances of this litigation.

25. Judge Vernon S. Broderick, Jr.

In re Keurig Green Mountain Single-Serve Coffee Antitrust Litig., (December 16, 2020)

No. 14-md-02542 (S.D.N.Y.):

I further appoint JND as Claims Administrator. JND's principals have more than 75 years-worth of combined class action legal administration experience, and JND has handled some of the largest recent settlement administration issues, including the Equifax Data Breach Settlement. (Doc. 1115 ¶ 5.) JND also has extensive experience in handling claims administration in the antitrust context. (Id. ¶ 6.) Accordingly, I appoint JND as Claims Administrator.

26. Judge R. David Proctor

In re Blue Cross Blue Shield Antitrust Litig., (November 30, 2020)

Master File No. 13-CV-20000-RDP (N.D. Ala.):

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

27. Honorable Laurel Beeler

Sidibe v. Sutter Health, (November 5, 2020)

No. 12-cv-4854-LB (N.D. Cal.):

Class Counsel has retained JND Legal Administration (“JND”), an experienced class notice administration firm, to administer notice to the Class. The Court appoints JND as the Class Notice Administrator.

28. Judge Carolyn B. Kuhl

Sandoval v. Merlex Stucco Inc., (October 30, 2020)

No. BC619322 (Cal. Super. Ct.):

Additional Class Member class members, and because their names and addresses have not yet been confirmed, will be notified of the pendency of this settlement via the digital media campaign... the Court approves the Parties selection of JND Legal as the third-party Claims Administrator.

29. Honorable Louis L. Stanton

Rick Nelson Co. v. Sony Music Ent., (September 16, 2020)

No. 18-cv-08791 (S.D.N.Y.):

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

30. Honorable Jesse M. Furman

In re General Motors LLC Ignition Switch Litig., economic settlement, (April 27, 2020)

No. 2543 (MDL) (S.D.N.Y.):

The Court further finds that the Class Notice informs Class Members of the Settlement in a reasonable manner under Federal Rule of Civil Procedure 23(e)(1)(B) because it fairly apprises the prospective Class Members of the terms of the proposed Settlement and of the options that are open to them in connection with the proceedings.

The Court therefore approves the proposed Class Notice plan, and hereby directs that such notice be disseminated to Class Members in the manner set forth in the Settlement Agreement and described in the Declaration of the Class Action Settlement Administrator...

31. Honorable Virginia A. Phillips

Sonner v. Schwabe North America, Inc., (April 7, 2020)

No. 15-cv-01358 VAP (SPx) (C.D. Cal.):

The Court orders the appointment of JND Legal Administration to implement and administrate the dissemination of class notice and administer opt-out requests pursuant to the proposed notice dissemination plan attached as Exhibit D to the Stipulation.

32. Judge Fernando M. Olguin

Ahmed v. HSBC Bank USA, NA, (December 30, 2019)

No. 15-cv-2057-FMO-SPx (N.D. Ill.):

On June 21, 2019, the court granted preliminary approval of the settlement, appointed JND Legal Administration ("JND") as settlement administrator... the court finds that the class notice and the notice process fairly and adequately informed the class members of the nature of the action, the terms of the proposed settlement, the effect of the action and release of claims, the class members' right to exclude themselves from the action, and their right to object to the proposed settlement...the reaction of the class has been very positive.

33. Honorable Stephen V. Wilson

USC Student Health Ctr. Settlement, (June 12, 2019)

No. 18-cv-04258-SVW (C.D. Cal.):

The Court hereby designates JND Legal Administration ("JND") as Claims Administrator. The Court finds that giving Class Members notice of the Settlement is justified under Rule 23(e)(1) because, as described above, the Court will likely be able to: approve the Settlement under Rule 23(e)(2); and certify the Settlement Class for purposes of judgment. The Court finds that the proposed Notice satisfies the requirements of due process and Federal Rule of Civil Procedure 23 and provides the best notice practicable under the circumstances.

34. Judge J. Walton McLeod

Boskie v. Backgroundchecks.com, (May 17, 2019)

No. 2019CP3200824 (S.C. C.P.):

The Court appoints JND Legal Administration as Settlement Administrator...The Court approves the notice plans for the HomeAdvisor Class and the Injunctive Relief Class as set forth in the declaration of JND Legal Administration. The Court finds the class notice fully satisfies the requirements of due process, the South Carolina Rules of Civil Procedure. The notice plan for the HomeAdvisor Class and Injunctive Relief Class constitutes the best notice practicable under the circumstances of each Class.

35. Judge Kathleen M. Daily

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

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

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

36. Honorable Kenneth J. Medel

Huntzinger v. Suunto Oy, (December 14, 2018)

No. 37-2018-27159 (CU) (BT) (CTL) (Cal. Super. Ct.):

The Court finds that the Class Notice and the Notice Program implemented pursuant to the Settlement Agreement and Preliminary Approval Order constituted the best notice practicable under the circumstances to all persons within the definition of the Class and fully complied with the due process requirement under all applicable statutes and laws and with the California Rules of Court.

37. Honorable Thomas M. Durkin

In re Broiler Chicken Antitrust Litig., (November 16, 2018)

No. 16-cv-8637 (N.D. Ill.):

The notice given to the Class, including individual notice to all members of the Class who could be identified through reasonable efforts, 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 entitled to such notice, and said notice fully satisfied the requirements of Rules 23(c)(2) and 23(e)(1) of the Federal Rules of Civil Procedure and the requirements of due process.

38. Honorable Kenneth J. Medel

Huntzinger v. Suunto Oy, (August 10, 2018)

No. 37-2018-27159 (CU) (BT) (CTL) (Cal. Super. Ct.):

The Court finds that the notice to the Class Members regarding settlement of this Action, including the content of the notices and method of dissemination to the Class Members in accordance with the terms of Settlement Agreement, constitute the best notice practicable under the circumstances and constitute valid, due and sufficient notice to all Class Members, complying fully with the requirements of California Code of Civil Procedure § 382, California Civil Code § 1781, California Rules of Court Rules 3.766 and 3.769(f), the California and United States Constitutions, and any other applicable law.

39. Honorable Thomas M. Durkin

In re Broiler Chicken Antitrust Litig., (June 22, 2018)

No. 16-cv-8637 (N.D. Ill.):

The proposed notice plan set forth in the Motion and the supporting declarations comply with Rule 23(c)(2)(B) and due process as it constitutes the best notice that is practicable under the circumstances, including individual notice via mail and email to all members who can be identified through reasonable effort. The direct mail and email notice will be supported by reasonable publication notice to reach class members who could not be individually identified.

40. Judge John Bailey

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

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

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

41. Honorable Ann I. Jones

Eck v. City of Los Angeles, (September 15, 2017)

No. BC577028 (Cal. Super. Cal.):

The form, manner, and content of the Class Notice, attached to the Settlement Agreement as Exhibits B, E, F and G, will provide the best notice practicable to the Class under the circumstances, constitutes valid, due, and sufficient notice to all Class Members, and fully complies with California Code of Civil Procedure section 382, California Code of Civil Procedure section 1781, the Constitution of the State of California, the Constitution of the United States, and other applicable law.

42. Honorable James Ashford

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

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

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

43. Judge Cecilia M. Altonaga

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

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

...the forms, content, and manner of notice proposed by the Parties and approved herein meet the requirements of due process and FED. R. CIV. P. 23(c) and (e), are the best notice practicable under the circumstances, constitute sufficient notice to all persons entitled to notice, and satisfy the Constitutional requirements of notice.

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

44. Judge Manish S. Shah

Johnson v. Yahoo! Inc., (December 12, 2016)

No. 14-cv-02028 (N.D. Ill.):

The Court approves the notice plan set forth in Plaintiff's Amended Motion to Approve Class Notice (Doc. 252) (the "Notice Plan"). The Notice Plan, in form, method, and content, complies with the requirements of Rule 23 of the Federal Rules of Civil Procedure and due process, and constitutes the best notice practicable under the circumstances.

45. Judge Joan A. Leonard

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

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

The notice of settlement (in the form presented to this Court as Exhibits E, F, and G, attached to the Settlement Agreement [D.E. 423-1] (collectively, "the Notice") directed to the Settlement Class members, constituted the best notice practicable under the circumstances. In making this determination, the Court finds that the Notice was given to potential Settlement Class members who were identified through reasonable efforts, published using several publication dates in *Better Homes and Gardens*, *National Geographic*, and *People* magazines; placed on targeted website and portal banner advertisements on general Run of Network sites; included in e-newsletter placements with *ADDitude*, a magazine dedicated to helping children and adults with attention deficit disorder and learning disabilities lead successful lives, and posted on the Settlement Website which included additional access to Settlement information and a toll-free number. Pursuant to, and in accordance with, Federal Rule of Civil Procedure 23, the Court hereby finds that the Notice provided Settlement Class members with due and adequate notice of the Settlement, the Settlement Agreement, these proceedings, and the rights of Settlement Class members to make a claim, object to the Settlement or exclude themselves from the Settlement.

46. Judge Marco A. Hernandez

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

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

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

47. Honorable Amy J. St. Eve

In re Rust-Oleum Restore Mktg, Sales Practices & Prod. Liab. Litig., (October 20, 2016)

No. 15-cv-01364 (N.D. Ill.):

The Notices of Class Action and Proposed Settlement (Exhibits A and B to the Settlement Agreement) and the method of providing such Notices to the proposed Settlement Class...comply with Fed. R. Civ. P. 23(e) and due process, constitute the best notice practicable under the circumstances, and provide due and sufficient notice to all persons entitled to notice of the settlement of this Action.

48. Honorable R. Gary Klausner

Russell v. Kohl's Dep't Stores, Inc., (October 20, 2016)

No. 15-cv-01143 (C.D. Cal.):

Notice of the settlement was provided to the Settlement Class in a reasonable manner, and was the best notice practicable under the circumstances, including through individual notice to all members who could be reasonably identified through reasonable effort.

49. Judge Fernando M. Olguin

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

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

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

50. Honourable Justice Stack

Anderson v. Canada, (September 28, 2016)

No. 2007 01T4955CP (NL Sup. Ct.):

The Phase 2 Notice Plan satisfies the requirements of the Class Actions Act and shall constitute good and sufficient service upon class members of the notice of this Order, approval of the Settlement and discontinuance of these actions.

51. Judge Mary M. Rowland

In re Home Depot, Inc., Customer Data Sec. Breach Litig., (August 23, 2016)

No. 14-md-02583 (N.D. Ga.):

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

52. Honorable Manish S. Shah

Campos v. Calumet Transload R.R., LLC, (August 3, 2016)

No. 13-cv-08376 (N.D. Ill.):

The form, content, and method of dissemination of the notice given to the Settlement Class were adequate, reasonable, and constitute the best notice practicable under the

circumstances. The notice, as given, provided valid, due, and sufficient notice of the Settlements, the terms and conditions set forth therein, and these proceedings to all Persons entitled to such notice. The notice satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure (“Rule 23”) and due process.

53. Honorable Lynn Adelman

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

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

54. Judge Marco A. Hernandez

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

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

55. Judge Joan A. Leonard

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

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

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

56. Honorable Manish S. Shah

Campos v. Calumet Transload R.R., LLC, (March 10, 2016 and April 18, 2016)

No. 13-cv-08376 (N.D. Ill.):

The Court further finds that the mailing and publication of Notice in the manner set forth in the Notice Program is the best notice practicable under the circumstances, constitutes due and sufficient notice of the Settlement and this Order to all persons entitled thereto, and is in full compliance with the requirements of Fed. R. Civ. P. 23, applicable law, and due process.

57. Judge Thomas W. Thrash Jr.

In re Home Depot, Inc., Customer Data Sec. Breach Litig., (March 8, 2016)

No. 14-md-02583 (N.D. Ga.):

The Court finds that the form, content and method of giving notice to the Class as described in Paragraph 7 of this Order and the Settlement Agreement (including the exhibits thereto): (a) will constitute the best practicable notice to the Settlement Class; (b) are reasonably calculated, under the circumstances, 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) are reasonable and constitute due, adequate, and sufficient notice to all Class Members and other persons entitled

to receive notice; and (d) meet all applicable requirements of law, including Fed. R. Civ. P. 23(c) and (e), and the Due Process Clause(s) of the United States Constitution. The Court further finds that the Notice is written in plain language, uses simple terminology, and is designed to be readily understandable by Class Members.

58. Judge Mary M. Rowland

In re Sears, Roebuck and Co. Front-Loader Washer Prod. Liab. Litig., (February 29, 2016)
No. 06-cv-07023 (N.D. Ill.):

The Court concludes that, under the circumstances of this case, the Settlement Administrator's notice program was the "best notice that is practicable," Fed. R. Civ. P. 23(c)(2)(B), and was "reasonably calculated to reach interested parties," *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306, 318 (1950).

59. Honorable Lynn Adelman

***Fond Du Lac Bumper Exch., Inc. v. Jui Li Enter. Ins. Co.,
(Indirect Purchaser–Tong Yang & Gordon Settlements)***, (January 14, 2016)
No. 09-CV-00852 (E.D. Wis.):

The form, content, and methods of dissemination of Notice of the Settlements to the Settlement Class were reasonable, adequate, and constitute the best notice practicable under the circumstances. The Notice, as given, provided valid, due, and sufficient notice of the Settlements, the terms and conditions set forth in the Settlements, and these proceedings to all persons and entities entitled to such notice, and said notice fully satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure and due process requirements.

60. Judge Curtis L. Collier

In re Skelaxin (Metaxalone) Antitrust Litig., (December 22, 2015)
No. 12-md-2343 (E.D. Tenn.):

The Class Notice met statutory requirements of notice under the circumstances, and fully satisfied the requirements of Federal Rule of Civil Procedure 23 and the requirement process.

61. Honorable Mitchell D. Dembin

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

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

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

62. Honorable Lynn Adelman

Fond Du Lac Bumper Exch., Inc. v. Jui Li Enter. Ins. Co.,

(Indirect Purchaser–Gordon Settlement), (August 4, 2015)

No. 09-CV-00852 (E.D. Wis.):

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

63. Honorable Sara I. Ellis

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

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

The Court approves the form and content of the Long-Form Notice, Summary Notice, Postcard Notice, Dealer Notice, and Internet Banners (the “Notices”) attached as

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

64. Honorable Lynn Adelman

Fond du Lac Bumper Exch., Inc. v. Jui Li Enter.Co., Ltd.
(Indirect Purchaser–Tong Yang Settlement), (May 29, 2015)
No. 09-CV-00852 (E.D. Wis.):

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

65. Honorable Mitchell D. Dembin

Lerma v. Schiff Nutrition Int'l, Inc., (May 25, 2015)
No. 11-CV-01056 (S.D. Cal.):

The parties are to notify the Settlement Class in accordance with the Notice Program outlined in the Second Supplemental Declaration of Gina M. Intrepido-Bowden on Settlement Notice Program.

66. Honorable Lynn Adelman

Fond du Lac Bumper Exch., Inc. v. Jui Li Enter. Co., Ltd.
(Direct Purchaser–Gordon Settlement), (May 5, 2015)
No. 09-CV-00852 (E.D. Wis.):

The Notice Program set forth herein is substantially similar to the one set forth in the Court's April 24, 2015 Order regarding notice of the Tong Yang Settlement (ECF. No. 619) and combines the Notice for the Tong Yang Settlement with that of the Gordon Settlement into a comprehensive Notice Program. To the extent differences exist between the two, the Notice Program set forth and approved herein shall prevail over that found in the April 24, 2015 Order.

67. Honorable José L. Linares

Demmick v. Celco P'ship, (May 1, 2015)
No. 06-CV-2163 (D.N.J.):

The Notice Plan, which this Court has already approved, was timely and properly executed and that it provided the best notice practicable, as required by Federal Rule of Civil Procedure 23, and met the “desire to actually inform” due process communications standard of Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306 (1950) The Court thus affirms its finding and conclusion in the November 19, 2014 Preliminary Approval Order that the notice in this case meets the requirements of the Federal Rules of Civil Procedure and the Due Process Clause of the United States and/or any other applicable law. All objections submitted which make mention of notice have been considered and, in light of the above, overruled.

68. Honorable David O. Carter

Cobb v. BSH Home Appliances Corp., (December 29, 2014)
No. 10-CV-0711 (C.D. Cal.):

The Notice Program complies with Rule 23(c)(2)(B) because it constitutes the best notice practicable under the circumstances, provides individual notice to all Class Members who can be identified through reasonable effort, and is reasonably calculated under the circumstances to apprise the Class Members of the nature of the action,

the claims it asserts, the Class definition, the Settlement terms, the right to appear through an attorney, the right to opt out of the Class or to comment on or object to the Settlement (and how to do so), and the binding effect of a final judgment upon Class Members who do not opt out.

69. Honorable José L. Linares

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

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

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

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

70. Honorable Christina A. Snyder

Roberts v. Electrolux Home Prod., Inc., (September 11, 2014)

No. 12-CV-01644 (C.D. Cal.):

Accordingly, the Court hereby finds and concludes that members of the Settlement Class have been provided the best notice practicable of the Settlement and that such notice satisfies all requirements of federal and California laws and due process. The Court finally approves the Notice Plan in all respects...Any objections to the notice provided to the Class are hereby overruled.

71. Judge Gregory A. Presnell

Poertner v. Gillette Co., (August 21, 2014)

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

This Court has again reviewed the Notice and the accompanying documents and finds that the “best practicable” notice was given to the Class and that the Notice was “reasonably calculated” to (a) describe the Action and the Plaintiff’s and Class Members’ rights in it; and (b) apprise interested parties of the pendency of the Action and of their right to have their objections to the Settlement heard. See Phillips Petroleum Co. v. Shutts, 472 U.S. 797, 810 (1985). This Court further finds that Class Members were given a reasonable opportunity to opt out of the Action and that they were adequately represented by Plaintiff Joshua D. Poertner. See Id. The Court thus reaffirms its findings that the Notice given to the Class satisfies the requirements of due process and holds that it has personal jurisdiction over all Class Members.

72. Honorable Christina A. Snyder

Roberts v. Electrolux Home Prod., Inc., (May 5, 2014)

No. 12-CV-01644 (C.D. Cal.):

The Court finds that the Notice Plan set forth in the Settlement Agreement (§ V. of that Agreement) is the best notice practicable under the circumstances and constitutes sufficient notice to all persons entitled to notice. The Court further preliminarily finds that the Notice itself IS appropriate, and complies with Rules 23(b)(3), 23(c)(2)(B), and 23(e) because it describes in plain language (1) the nature of the action, (2) the definition of the Settlement Class and Subclasses, (3) the class claims, issues or defenses, (4) that a class member may enter an appearance through an attorney if the member so desires, (5) that the Court will exclude from the class any member who requests exclusion, (6) the time and manner for requesting exclusion, and (7) the binding effect of a judgment on Settlement Class Members under Rule 23(c)(3) and the terms of the releases. Accordingly, the Court approves the Notice Plan in all respects...

73. Honorable William E. Smith

Cappalli v. BJ's Wholesale Club, Inc., (December 12, 2013)

No. 10-CV-00407 (D.R.I.):

The Court finds that the form, content, and method of dissemination of the notice given to the Settlement Class were adequate and reasonable, and constituted the best notice practicable under the circumstances. The notice, as given, provided valid, due, and sufficient notice of these proceedings of the proposed Settlement, and of the terms set forth in the Stipulation and first Joint Addendum, and the notice fully satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure, Constitutional due process, and all other applicable laws.

74. Judge Gregory A. Presnell

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

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

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

75. Judge Marilyn L. Huff

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

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

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

76. Judge Tom A. Lucas

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

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

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

77. Judge Marilyn L. Huff

Beck-Ellman v. Kaz USA, Inc., (January 7, 2013)

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

The proposed Class Notice, Publication Notice, and Settlement Website are reasonably calculated to inform potential Class members of the Settlement, and are the best practicable methods under the circumstances... Notice is written in easy and clear language, and provides all needed information, including: (1) basic information about the lawsuit; (2) a description of the benefits provided by the settlement; (3) an explanation of how Class members can obtain Settlement benefits; (4) an explanation of how Class members can exercise their rights to opt-out or object; (5) an explanation that any claims against Kaz that could have been litigated in this action will be released if the Class member does not opt out; (6) the names of Class Counsel and information regarding attorneys' fees; (7) the fairness hearing date and procedure for appearing; and (8) the Settlement Website and a toll free number where additional information, including Spanish translations of all forms, can be obtained. After review of the proposed notice and Settlement Agreement, the Court concludes that the Publication Notice and Settlement Website are adequate and sufficient to inform the class members of their rights. Accordingly, the Court approves the form and manner of giving notice of the proposed settlement.

78. Judge Tom A. Lucas

Stroud v. eMachines, Inc., (December 21, 2012)

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

The Plan of Notice in the Settlement Agreement as well as the content of the Claim Form, Class Notice, Post-Card Notice, and Summary Notice of Settlement is hereby approved in all respects. The Court finds that the Plan of Notice and the contents of the Class Notice, Post-Card Notice and Summary Notice of Settlement and the manner of their dissemination described in the Settlement Agreement is the best practicable notice under the circumstances and is reasonably calculated, under the circumstances, to apprise Putative Class Members of the pendency of this action, the terms of the Settlement Agreement, and their right to object to the Settlement Agreement or exclude themselves from the Certified Settlement Class and, therefore, the Plan of Notice, the Class Notice, Post-Card Notice and Summary Notice of Settlement are approved in all respects. The Court further finds that the Class Notice, Post-Card Notice and Summary Notice of Settlement are reasonable, that they constitute due, adequate, and sufficient notice to all persons entitled to receive notice, and that they meet the requirements of due process.

79. Honorable Michael M. Anello

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

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

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

80. Judge Ann D. Montgomery

In re Uponor, Inc., F1807 Plumbing Fittings Prod. Liab. Litig., (July 9, 2012)
No. 11-MD-2247 (D. Minn.):

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

81. Judge Ann D. Montgomery

In re Uponor, Inc., F1807 Plumbing Fittings Prod. Liab. Litig., (June 29, 2012)
No. 11-MD-2247 (D. Minn.):

After the preliminary approval of the Settlement, the parties carried out the notice program, hiring an experienced consulting firm to design and implement the plan. The plan consisted of direct mail notices to known owners and warranty claimants of the RTI F1807 system, direct mail notices to potential holders of subrogation interests through insurance company mailings, notice publications in leading consumer magazines which target home and property owners, and earned media efforts through national press releases and the Settlement website. The plan was intended to, and did in fact, reach a minimum of 70% of potential class members, on average more than two notices each...The California Objectors also take umbrage with the notice provided the class. Specifically, they argue that the class notice fails to advise class members of the true nature of the aforementioned release. This argument does not float, given that the release is clearly set forth in the Settlement and the published notices satisfy the requirements of Rule 23(c)(2)(B) by providing information regarding: (1) the nature of the action class membership; (2) class claims, issues, and defenses; (3) the ability to enter an appearance through an attorney; (4) the procedure and ability to opt-out or object; (5) the process and instructions to make a claim; (6) the binding effect of the class judgment; and (7) the specifics of the final fairness hearing.

82. Honorable Michael M. Anello

Shames v. Hertz Corp., (May 22, 2012)

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

The Court approves, as to form and content, the Notice of Proposed Settlement of Class Action, substantially in the forms of Exhibits A-1 through A-6, as appropriate, (individually or collectively, the “Notice”), and finds that the e-mailing or mailing and distribution of the Notice and publishing of the Notice substantially in the manner and form set forth in ¶ 7 of this Order meet the requirements of Federal Rule of Civil Procedure 23 and due process, and is the best notice practicable under the circumstances and shall constitute due and sufficient notice to all Persons entitled thereto.

83. Judge Ann D. Montgomery

In re Uponor, Inc., F1807 Plumbing Fittings Prod. Liab. Litig., (January 18, 2012)

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

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

84. Judge Jeffrey Goering

Molina v. Intrust Bank, N.A., (January 17, 2012)

No. 10-CV-3686 (Ks. 18th J.D. Ct.):

The Court approved the form and content of the Class Notice, and finds that transmission of the Notice as proposed by the Parties meets the requirements of due process and Kansas law, is the best notice practicable under the circumstances, and constitutes due and sufficient notice to all persons entitled thereto.

85. Judge Charles E. Atwell

Allen v. UMB Bank, N.A., (October 31, 2011)

No. 1016-CV34791 (Mo. Cir. Ct.):

The form, content, and method of dissemination of Class Notice given to the Class were adequate and reasonable, and constituted the best notice practicable under the circumstances. The Notice, as given, provided valid, due, and sufficient notice of the proposed settlement, the terms and conditions set forth in the Settlement Agreement, and these proceedings to all persons entitled to such notice, and said notice fully satisfied the requirements of Rule 52.08 of the Missouri Rules of Civil Procedure and due process.

86. Judge Charles E. Atwell

Allen v. UMB Bank, N.A., (June 27, 2011)

No. 1016-CV34791 (Mo. Cir. Ct.):

The Court approves the form and content of the Class Notice, and finds that transmission of the Notice as proposed by the Parties meets the requirements of due process and Missouri law, is the best notice practicable under the circumstances, and constitutes due and sufficient notice to all persons entitled thereto.

87. Judge Jeremy Fogel

Ko v. Natura Pet Prod., Inc., (June 24, 2011)

No. 09cv2619 (N.D. Cal.):

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

88. Judge M. Joseph Tiemann

Billieson v. City of New Orleans, (May 27, 2011)

No. 94-19231 (La. Civ. Dist. Ct.):

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

89. Judge James Robertson

In re Dep’t of Veterans Affairs (VA) Data Theft Litig., (February 11, 2009)

MDL No. 1796 (D.D.C.):

The Court approves the proposed method of dissemination of notice set forth in the Notice Plan, Exhibit 1 to the Settlement Agreement. The Notice Plan meets the requirements of due process and is the best notice practicable under the circumstances. This method of Class Action Settlement notice dissemination is hereby approved by the Court.

90. Judge Louis J. Farina

Soders v. Gen. Motors Corp., (December 19, 2008)

No. CI-00-04255 (C.P. Pa.):

The Court has considered the proposed forms of Notice to Class members of the settlement and the plan for disseminating Notice, and finds that the form and manner of notice proposed by the parties and approved herein meet the requirements of due process, are the best notice practicable under the circumstances, and constitute sufficient notice to all persons entitled to notice.

91. Judge Robert W. Gettleman

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

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

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

92. Judge William G. Young

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

MDL No. 1838 (D. Mass.):

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

93. Judge David De Alba

Ford Explorer Cases, (May 29, 2008)

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

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

III.

SPEAKING ENGAGEMENTS

1. **'Marching to Their Own Drumbeat.' What Lawyers Don't Understand About Notice and Claims Administration**, AMERICAN BAR ASSOCIATION, American Bar Association's (ABA) 23rd Annual National Institute on Class Actions, panelist (October 2019).
2. **Rule 23 Amendments and Digital Notice Ethics, accredited CLE Program**, presenter at Terrell Marshall Law Group PLLC, Seattle, WA (June 2019); Severson & Werson, San Francisco, CA and broadcast to office in Irvine (June 2019); Greenberg Traurig, LLP, Los Angeles, CA (May 2019); Chicago Bar Association, Chicago, IL (January 2019); Sidley Austin LLP, Century City, CA and broadcast to offices in Los Angeles, San Francisco, New York, Chicago, Washington D.C. (January 2019); Burns Charest LLP, Dallas, TX (November 2018); Lockridge Grindal Nauen P.L.L.P., Minneapolis, MN (October 2018); Zimmerman Reed LLP, Minneapolis, MN (October 2018); Gustafson Gluek PLLC, Minneapolis, MN (October 2018).
3. **Ethics in Legal Notification, accredited CLE Program**, presenter at Kessler Topaz Meltzer & Check LLP, Radnor, PA (September 2015); The St. Regis Resort, Deer Valley, UT (March 2014); and Morgan Lewis & Bockius, New York, NY (December 2012).
4. **Pitfalls of Class Action Notice and Settlement Administration, accredited CLE Program**, PRACTISING LAW INSTITUTE (PLI), Class Action Litigation 2013, presenter/panelist (July 2013).
5. **The Fundamentals of Settlement Administration, accredited CLE Program**, presenter at Skadden, Arps, Slate, Meagher & Flom LLP, Chicago, IL (January 2013); Wexler Wallace LLP, Chicago, IL (January 2013); Hinshaw & Culbertson LLP, Chicago, IL (October 2012); and Spector Roseman Kodroff & Willis, P.C., Philadelphia, PA (December 2011).
6. **Class Action Settlement Administration Tips & Pitfalls on the Path to Approval, accredited CLE Program**, presenter at Jenner & Block, Chicago, IL and broadcast to offices in Washington DC, New York and California (October 2012).
7. **Reaching Class Members & Driving Take Rates**, CONSUMER ATTORNEYS OF SAN DIEGO, 4th Annual Class Action Symposium, presenter/panelist (October 2011).

8. **Legal Notice Ethics, accredited CLE Program**, presenter at Heins Mills & Olson, P.L.C., Minneapolis, MN (January 2011); Lockridge Grindal Nauen P.L.L.P., Minneapolis, MN (January 2011); Chestnut Cambronne, Minneapolis, MN (January 2011); Berger & Montague, P.C., Anapol Schwartz, Philadelphia, PA (October 2010); Lundy Law, Philadelphia, PA (October 2010); Dechert LLP, Philadelphia, PA and broadcast to offices in California, New Jersey, New York, North Carolina, Texas, Washington D.C., and London and sent via video to their office in China (October 2010); Miller Law LLC, Chicago, IL (May 2010); Cohen Milstein Sellers & Toll PLLC, New York, NY (May 2010); and Milberg LLP, New York, NY (May 2010).
9. **Class Actions 101: Best Practices and Potential Pitfalls in Providing Class Notice, accredited CLE Program**, presenter, Kansas Bar Association (March 2009).

IV.

ARTICLES

1. Gina M. Intrepido-Bowden, *Time to Allow More Streamlined Class Action Notice Formats – Adapting Short Form Notice Requirements to Accommodate Today’s Fast Paced Society*, LAW360 (2021).
2. Todd B. Hilsee, Gina M. Intrepido & Shannon R. Wheatman, *Hurricanes, Mobility and Due Process: The “Desire-to-Inform” Requirement for Effective Class Action Notice Is Highlighted by Katrina*, 80 TULANE LAW REV. 1771 (2006); reprinted in course materials for: CENTER FOR LEGAL EDUCATION INTERNATIONAL, *Class Actions: Prosecuting and Defending Complex Litigation* (2007); AMERICAN BAR ASSOCIATION, *10th Annual National Institute on Class Actions* (2006); NATIONAL BUSINESS INSTITUTE, *Class Action Update: Today’s Trends & Strategies for Success* (2006).
3. Gina M. Intrepido, *Notice Experts May Help Resolve CAFA Removal Issues, Notification to Officials*, 6 CLASS ACTION LITIG. REP. 759 (2005).
4. Todd B. Hilsee, Shannon R. Wheatman, & Gina M. Intrepido, *Do You Really Want Me to Know My Rights? The Ethics Behind Due Process in Class Action Notice Is More Than Just Plain Language: A Desire to Actually Inform*, 18 GEORGETOWN JOURNAL LEGAL ETHICS 1359 (2005).

CASE EXPERIENCE

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

CASE NAME	CASE NUMBER	LOCATION
<i>A.B. v. Regents of the Univ. of California</i>	20-cv-09555-RGK-E	C.D. Cal.
<i>Abante Rooter & Plumbing, Inc. v. New York Life Ins. Co.</i>	16-cv-03588	S.D.N.Y.
<i>Advance Trust & Life Escrow Serv. LTA, v. N. Am. Co. for Life and Health Ins.</i>	18-CV-00368	S.D. Iowa
<i>Advance Trust & Life Escrow Serv., LTA v. ReliaStar Life Ins. Co.</i>	18-cv-2863-DWF-ECW	D. Minn.
<i>Advance Trust & Life Escrow Serv., LTA v. Sec. Life of Denver Ins. Co.</i>	18-cv-01897-DDD-NYW	D. Colo.
<i>Ahmed v. HSBC Bank USA, NA</i>	15-cv-2057-FMO-SPx	N.D. Ill.
<i>Allen v. UMB Bank, N.A.</i>	1016-CV34791	Mo. Cir. Ct.
<i>Anderson v. Canada (Phase I)</i>	2008NLTD166	NL Sup. Ct.
<i>Anderson v. Canada (Phase II)</i>	2007 01T4955CP	NL Sup. Ct.
<i>Andrews v. Plains All Am. Pipeline, L.P.</i>	15-cv-04113-PSG-JEM	C.D. Cal.
<i>Angel v. U.S. Tire Recovery</i>	06-C-855	W. Va. Cir. Ct.
<i>Baiz v. Mountain View Cemetery</i>	809869-2	Cal. Super. Ct.
<i>Baker v. Jewel Food Stores, Inc. & Dominick's Finer Foods, Inc.</i>	00-L-9664	Ill. Cir. Ct.
<i>Barba v. Shire U.S., Inc.</i>	13-cv-21158	S.D. Fla.
<i>Beck-Ellman v. Kaz USA Inc.</i>	10-cv-2134	S.D. Cal.
<i>Beringer v. Certegy Check Serv., Inc.</i>	07-cv-1657-T-23TGW	M.D. Fla.
<i>Bibb v. Monsanto Co. (Nitro)</i>	041465	W. Va. Cir. Ct.
<i>Billieson v. City of New Orleans</i>	94-19231	La. Civ. Dist. Ct.
<i>Bland v. Premier Nutrition Corp.</i>	RG19-002714	Cal. Super. Ct.
<i>Boskie v. Backgroundchecks.com</i>	2019CP3200824	S.C. C.P.
<i>Brighton Tr. LLC, as Tr. v. Genworth Life & Annuity Ins. Co.</i>	20-cv-240-DJN	E.D. Va.

CASE NAME	CASE NUMBER	LOCATION
<i>Brookshire Bros. v. Chiquita</i>	05-CIV-21962	S.D. Fla.
<i>Brown v. Am. Tobacco</i>	J.C.C.P. 4042 No. 711400	Cal. Super. Ct.
<i>Bruzek v. Husky Oil Operations Ltd.</i>	18-cv-00697	W.D. Wis.
<i>Campos v. Calumet Transload R.R., LLC</i>	13-cv-08376	N.D. Ill.
<i>Cappalli v. BJ's Wholesale Club, Inc.</i>	10-cv-00407	D.R.I.
<i>Carter v. Monsanto Co. (Nitro)</i>	00-C-300	W. Va. Cir. Ct.
<i>Chambers v. Whirlpool Corp.</i>	11-cv-01733	C.D. Cal.
<i>Cobb v. BSH Home Appliances Corp.</i>	10-cv-00711	C.D. Cal.
<i>Davis v. Am. Home Prods. Corp.</i>	94-11684	La. Civ. Dist. Ct., Div. K
<i>DC 16 v. Sutter Health</i>	RG15753647	Cal. Super. Ct.
<i>Defrates v. Hollywood Ent. Corp.</i>	02L707	Ill. Cir. Ct.
<i>de Lacour v. Colgate-Palmolive Co.</i>	16-cv-8364-KW	S.D.N.Y.
<i>Demereckis v. BSH Home Appliances Corp.</i>	8:10-cv-00711	C.D. Cal.
<i>Demmick v. Cellco P'ship</i>	06-cv-2163	D.N.J.
<i>Desportes v. Am. Gen. Assurance Co.</i>	SU-04-CV-3637	Ga. Super. Ct.
<i>Dolen v. ABN AMRO Bank N.V.</i>	01-L-454 & 01-L-493	Ill. Cir. Ct.
<i>Donnelly v. United Tech. Corp.</i>	06-CV-320045CP	Ont. S.C.J.
<i>Eck v. City of Los Angeles</i>	BC577028	Cal. Super. Ct.
<i>Elec. Welfare Trust Fund v. United States</i>	19-353C	Fed. Cl.
<i>Engquist v. City of Los Angeles</i>	BC591331	Cal. Super. Ct.
<i>Ervin v. Movie Gallery Inc.</i>	CV-13007	Tenn. Ch. Fayette Co.
<i>First State Orthopaedics v. Concentra, Inc.</i>	05-CV-04951-AB	E.D. Pa.
<i>Fisher v. Virginia Electric & Power Co.</i>	02-CV-431	E.D. Va.
<i>Fishon v. Premier Nutrition Corp.</i>	16-CV-06980-RS	N.D. Cal.
<i>Flaum v. Doctor's Assoc., Inc. (d/b/a Subway)</i>	16-cv-61198	S.D. Fla.
<i>Fond du Lac Bumper Exch. Inc. v. Jui Li Enter. Co. Ltd. (Direct & Indirect Purchasers Classes)</i>	09-cv-00852	E.D. Wis.
<i>Ford Explorer Cases</i>	JCCP Nos. 4226 & 4270	Cal. Super. Ct.
<i>Friedman v. Microsoft Corp.</i>	2000-000722	Ariz. Super. Ct.
<i>FTC v. Reckitt Benckiser Grp. PLC</i>	19CV00028	W.D. Va.
<i>Gardner v. Stimson Lumber Co.</i>	00-2-17633-3SEA	Wash. Super. Ct.

CASE NAME	CASE NUMBER	LOCATION
<i>Gifford v. Pets Global, Inc.</i>	21-cv-02136-CJC-MRW	C.D. Cal.
<i>Gordon v. Microsoft Corp.</i>	00-5994	D. Minn.
<i>Grays Harbor v. Carrier Corp.</i>	05-05437-RBL	W.D. Wash.
<i>Griffin v. Dell Canada Inc.</i>	07-CV-325223D2	Ont. Super. Ct.
<i>Gunderson v. F.A. Richard & Assoc., Inc.</i>	2004-2417-D	La. 14 th Jud. Dist. Ct.
<i>Gupta v. Aeries Software, Inc.</i>	20-cv-00995	C.D. Cal.
<i>Gutierrez, Jr. v. Amplify Energy Corp.</i>	21-cv-01628-DOC-JDE	C.D. Cal.
<i>Hanks v. Lincoln Life & Annuity Co. of New York</i>	16-cv-6399 PKC	S.D.N.Y.
<i>Herrera v. Wells Fargo Bank, N.A.</i>	18-cv-00332-JVS-MRW	C.D. Cal.
<i>Hill-Green v. Experian Info. Solutions, Inc.</i>	19-cv-708-MHL	E.D. Va.
<i>Huntzinger v. Suunto Oy</i>	37-2018-00027159-CU-BT-CTL	Cal. Super. Ct.
<i>In re Anthem, Inc. Data Breach Litig.</i>	15-md-02617	N.D. Cal.
<i>In re Arizona Theranos, Inc. Litig.</i>	16-cv-2138-DGC	D. Ariz.
<i>In re Babcock & Wilcox Co.</i>	00-10992	E.D. La.
<i>In re Blue Cross Blue Shield Antitrust Litig.</i>	13-CV-20000-RDP	N.D. Ala.
<i>In re Broiler Chicken Antitrust Litig.</i>	16-cv-08637	N.D. Ill.
<i>In re Countrywide Fin. Corp. Customer Data Sec. Breach</i>	MDL 08-md-1998	W.D. Ky.
<i>In re Farm-raised Salmon and Salmon Prod. Antitrust Litig.</i>	19-cv-21551-CMA	S.D. Fla.
<i>In re General Motors LLC Ignition Switch Litig. (economic settlement)</i>	2543 (MDL)	S.D.N.Y.
<i>In re High Sulfur Content Gasoline Prod. Liab.</i>	MDL No. 1632	E.D. La.
<i>In re Home Depot, Inc., Customer Data Sec. Breach Litig.</i>	14-md-02583	N.D. Ga.
<i>In re Hypodermic Prod. Antitrust Litig.</i>	05-cv-01602	D.N.J.
<i>In re Keurig Green Mountain Single-Serve Coffee Antitrust Litig. (Indirect-Purchasers)</i>	14-md-02542	S.D.N.Y.
<i>In re Lidoderm Antitrust Litig.</i>	14-md-02521	N.D. Cal.
<i>In re Lupron Mktg. & Sales Practices</i>	MDL No.1430	D. Mass.
<i>In re Mercedes-Benz Emissions Litig.</i>	16-cv-881 (KM) (ESK)	D.N.J.
<i>In re Monitronics Int'l, Inc., TCPA Litig.</i>	11-cv-00090	N.D. W.Va.

CASE NAME	CASE NUMBER	LOCATION
<i>In re Packaged Seafood Prods. Antitrust Litig. (DPP and EPP Class)</i>	15-md-02670	S.D. Cal.
<i>In re Parmalat Sec.</i>	04-md-01653 (LAK)	S.D.N.Y.
<i>In re Residential Schools Litig.</i>	00-CV-192059 CPA	Ont. Super. Ct.
<i>In re Resistors Antitrust Litig.</i>	15-cv-03820-JD	N.D. Cal.
<i>In re Royal Ahold Sec. & "ERISA"</i>	03-md-01539	D. Md.
<i>In re Rust-Oleum Restore Mktg. Sales Practices & Prod. Liab. Litig.</i>	15-cv01364	N.D. Ill.
<i>In re Sears, Roebuck & Co. Front-Loading Washer Prod. Liab. Litig.</i>	06-cv-07023	N.D. Ill.
<i>In re Serzone Prod. Liab.</i>	02-md-1477	S.D. W. Va.
<i>In re Skelaxin (Metaxalone) Antitrust Litig.</i>	12-cv-194	E.D. Ten.
<i>In re Solodyn (Minocycline Hydrochloride) Antitrust Litig. (Direct Purchaser Class)</i>	14-md-2503	D. Mass.
<i>In re: Subaru Battery Drain Prods. Liab. Litig.</i>	20-cv-03095-JHR-MJS	D.N.J.
<i>In re TJX Cos. Retail Sec. Breach Litig.</i>	MDL No. 1838	D. Mass.
<i>In re Trans Union Corp. Privacy Litig.</i>	MDL No. 1350	N.D. Ill.
<i>In re Uponor, Inc., F1807 Prod. Liab. Litig.</i>	2247	D. Minn.
<i>In re U.S. Dep't of Veterans Affairs Data Theft Litig.</i>	MDL 1796	D.D.C.
<i>In re Volkswagen "Clean Diesel" Mktg., Sales Practice and Prods. Liab. Litig.</i>	MDL 2672 CRB	N.D. Cal.
<i>In re Zurn Pex Plumbing Prod. Liab. Litig.</i>	MDL 08-1958	D. Minn.
<i>In the Matter of GTV Media Grp. Inc.</i>	3-20537	SEC
<i>James v. PacifiCorp.</i>	20cv33885	Or. Cir. Ct.
<i>Johnson v. Yahoo! Inc.</i>	14-cv02028	N.D. Ill.
<i>Kearney v. Equilon Enter. LLC</i>	14-cv-00254	D. Ore.
<i>Ko v. Natura Pet Prod., Inc.</i>	09cv02619	N.D. Cal.
<i>Langan v. Johnson & Johnson Consumer Co.</i>	13-cv-01471	D. Conn.
<i>Lavinsky v. City of Los Angeles</i>	BC542245	Cal. Super. Ct.
<i>Lee v. Stonebridge Life Ins. Co.</i>	11-cv-00043	N.D. Cal.
<i>Leonard v. John Hancock Life Ins. Co. of NY</i>	18-CV-04994	S.D.N.Y.
<i>Jerma v. Schiff Nutrition Int'l, Inc.</i>	11-cv-01056	S.D. Cal.
<i>Levy v. Dolgencorp, LLC</i>	20-cv-01037-TJC-MCR	M.D. Fla.

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<i>In re Uponor, Inc., F1807 Prod. Liab. Litig.</i>	2247	D. Minn.
<i>In re U.S. Dep't of Veterans Affairs Data Theft Litig.</i>	MDL 1796	D.D.C.
<i>In re Zurn Pex Plumbing Prod. Liab. Litig.</i>	MDL 08-1958	D. Minn.
<i>In the Matter of GTV Media Grp. Inc.</i>	3-20537	SEC
<i>Johnson v. Yahoo! Inc.</i>	14-cv02028	N.D. Ill.
<i>Kearney v. Equilon Enter. LLC</i>	14-cv-00254	D. Ore.
<i>Ko v. Natura Pet Prod., Inc.</i>	09cv02619	N.D. Cal.
<i>Langan v. Johnson & Johnson Consumer Co.</i>	13-cv-01471	D. Conn.
<i>Lavinsky v. City of Los Angeles</i>	BC542245	Cal. Super. Ct.
<i>Lee v. Stonebridge Life Ins. Co.</i>	11-cv-00043	N.D. Cal.
<i>Leonard v. John Hancock Life Ins. Co. of NY</i>	18-CV-04994	S.D.N.Y.
<i>Lerma v. Schiff Nutrition Int'l, Inc.</i>	11-cv-01056	S.D. Cal.
<i>Levy v. Dolgencorp, LLC</i>	20-cv-01037-TJC-MCR	M.D. Fla.
<i>Lockwood v. Certegy Check Serv., Inc.</i>	07-CV-587-FtM-29-DNF	M.D. Fla.
<i>Luster v. Wells Fargo Dealer Serv., Inc.</i>	15-cv-01058	N.D. Ga.
<i>Malone v. Western Digital Corp.</i>	20-cv-03584-NC	N.D. Cal.
<i>Markson v. CRST Int'l, Inc.</i>	17-cv-01261-SB (SPx)	C.D. Cal.
<i>Martinelli v. Johnson & Johnson</i>	15-cv-01733-MCE-DB	E.D. Cal.
<i>McCall v. Hercules Corp.</i>	66810/2021	N.Y. Super. Ct.
<i>McCrary v. Elations Co., LLC</i>	13-cv-00242	C.D. Cal.
<i>Microsoft I-V Cases</i>	J.C.C.P. No. 4106	Cal. Super. Ct.
<i>Molina v. Intrust Bank, N.A.</i>	10-cv-3686	Ks. 18 th Jud. Dist. Ct.
<i>Morrow v. Conoco Inc.</i>	2002-3860	La. Dist. Ct.
<i>Mullins v. Direct Digital LLC.</i>	13-cv-01829	N.D. Ill.
<i>Myers v. Rite Aid of PA, Inc.</i>	01-2771	Pa. C.P.
<i>Naef v. Masonite Corp.</i>	CV-94-4033	Ala. Cir. Ct.
<i>Nature Guard Cement Roofing Shingles Cases</i>	J.C.C.P. No. 4215	Cal. Super. Ct.
<i>Nichols v. SmithKline Beecham Corp.</i>	00-6222	E.D. Pa.
<i>Nishimura v Gentry Homes, LTD.</i>	11-11-1-1522-07-RAN	Haw. Cir. Ct.
<i>Novoa v. The GEO Grp., Inc.</i>	17-cv-02514-JGB-SHK	C.D. Cal.
<i>Nwauzor v. GEO Grp., Inc.</i>	17-cv-05769	W.D. Wash.

CASE NAME	CASE NUMBER	LOCATION
<i>Lockwood v. Certegy Check Serv., Inc.</i>	07-CV-587-FtM-29-DNF	M.D. Fla.
<i>LSIMC, LLC v. Am. Gen. Life Ins. Co.</i>	20-cv-11518	C.D. Cal.
<i>Luster v. Wells Fargo Dealer Serv., Inc.</i>	15-cv-01058	N.D. Ga.
<i>Malone v. Western Digital Corp.</i>	20-cv-03584-NC	N.D. Cal.
<i>Markson v. CRST Int'l, Inc.</i>	17-cv-01261-SB (SPx)	C.D. Cal.
<i>Martinelli v. Johnson & Johnson</i>	15-cv-01733-MCE-DB	E.D. Cal.
<i>McCall v. Hercules Corp.</i>	66810/2021	N.Y. Super. Ct.
<i>McCrary v. Elations Co., LLC</i>	13-cv-00242	C.D. Cal.
<i>Microsoft I-V Cases</i>	J.C.C.P. No. 4106	Cal. Super. Ct.
<i>Molina v. Intrust Bank, N.A.</i>	10-cv-3686	Ks. 18 th Jud. Dist. Ct.
<i>Morrow v. Conoco Inc.</i>	2002-3860	La. Dist. Ct.
<i>Mullins v. Direct Digital LLC.</i>	13-cv-01829	N.D. Ill.
<i>Myers v. Rite Aid of PA, Inc.</i>	01-2771	Pa. C.P.
<i>Naef v. Masonite Corp.</i>	CV-94-4033	Ala. Cir. Ct.
<i>Nature Guard Cement Roofing Shingles Cases</i>	J.C.C.P. No. 4215	Cal. Super. Ct.
<i>Nichols v. SmithKline Beecham Corp.</i>	00-6222	E.D. Pa.
<i>Nishimura v Gentry Homes, LTD.</i>	11-11-1-1522-07-RAN	Haw. Cir. Ct.
<i>Novoa v. The GEO Grp., Inc.</i>	17-cv-02514-JGB-SHK	C.D. Cal.
<i>Nwauzor v. GEO Grp., Inc.</i>	17-cv-05769	W.D. Wash.
<i>Palace v. DaimlerChrysler</i>	01-CH-13168	Ill. Cir. Ct.
<i>Peek v. Microsoft Corp.</i>	CV-2006-2612	Ark. Cir. Ct.
<i>Plubell v. Merck & Co., Inc.</i>	04CV235817-01	Mo. Cir. Ct.
<i>Podawiltz v. Swisher Int'l, Inc.</i>	16CV27621	Or. Cir. Ct.
<i>Poertner v. Gillette Co.</i>	12-cv-00803	M.D. Fla.
<i>Prather v. Wells Fargo Bank, N.A.</i>	15-cv-04231	N.D. Ga.
<i>Q+ Food, LLC v. Mitsubishi Fuso Truck of Am., Inc.</i>	14-cv-06046	D.N.J.
<i>Richison v. Am. Cemwood Corp.</i>	005532	Cal. Super. Ct.
<i>Rick Nelson Co. v. Sony Music Ent.</i>	18-cv-08791	S.D.N.Y.
<i>Roberts v. Electrolux Home Prod., Inc.</i>	12-cv-01644	C.D. Cal.
<i>Russell v. Kohl's Dep't Stores, Inc.</i>	15-cv-01143	C.D. Cal.
<i>Sandoval v. Merlex Stucco Inc.</i>	BC619322	Cal. Super. Ct.

CASE NAME	CASE NUMBER	LOCATION
<i>Scott v. Blockbuster, Inc.</i>	D 162-535	136 th Tex. Jud. Dist.
<i>Senne v Office of the Comm'r of Baseball</i>	14-cv-00608-JCS	N.D. Cal.
<i>Shames v. Hertz Corp.</i>	07cv2174-MMA	S.D. Cal.
<i>Sidibe v. Sutter Health</i>	12-cv-4854-LB	N.D. Cal.
<i>Staats v. City of Palo Alto</i>	2015-1-CV-284956	Cal. Super. Ct.
<i>Soders v. Gen. Motors Corp.</i>	CI-00-04255	Pa. C.P.
<i>Sonner v. Schwabe North America, Inc.</i>	15-cv-01358 VAP (SPx)	C.D. Cal.
<i>Stroud v. eMachines, Inc.</i>	CJ-2003-968-L	W.D. Okla.
<i>Swetz v. GSK Consumer Health, Inc.</i>	20-cv-04731	S.D.N.Y.
<i>Talalai v. Cooper Tire & Rubber Co.</i>	MID-L-8839-00 MT	N.J. Super. Ct.
<i>Tech. Training Assoc. v. Buccaneers Ltd. P'ship</i>	16-cv-01622	M.D. Fla.
<i>Thibodeaux v. Conoco Philips Co.</i>	2003-481	La. 4 th Jud. Dist. Ct.
<i>Thomas v. Lennox Indus. Inc.</i>	13-cv-07747	N.D. Ill.
<i>Thompson v. Metropolitan Life Ins. Co.</i>	00-CIV-5071 HB	S.D. N.Y.
<i>Turner v. Murphy Oil USA, Inc.</i>	05-CV-04206-EEF-JCW	E.D. La.
<i>USC Student Health Ctr. Settlement</i>	18-cv-04258-SVW	C.D. Cal.
<i>Walker v. Rite Aid of PA, Inc.</i>	99-6210	Pa. C.P.
<i>Wells v. Abbott Lab., Inc. (AdvantEdge/ Myoplex nutrition bars)</i>	BC389753	Cal. Super. Ct.
<i>Wener v. United Tech. Corp.</i>	500-06-000425-088	QC. Super. Ct.
<i>West v. G&H Seed Co.</i>	99-C-4984-A	La. 27 th Jud. Dist. Ct.
<i>Williams v. Weyerhaeuser Co.</i>	CV-995787	Cal. Super. Ct.
<i>Yamagata v. Reckitt Benckiser, LLC</i>	17-cv-03529-CV	N.D.Cal.
<i>Zarebski v. Hartford Ins. Co. of the Midwest</i>	CV-2006-409-3	Ark. Cir. Ct.

— EXHIBIT 4 —
Notice Plan

Moehrl and Burnett Settlements

RECOMMENDED NOTICE PLAN

NOTICE PLAN OBJECTIVE

The objective of the proposed Notice Plan is to provide the best notice practicable, consistent with the methods and tools employed in other court-approved notice programs. The Federal Judicial Center's (FJC) *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide* considers a Notice Plan with a high reach (above 70%) effective.¹

CLASS DEFINITION

The Court certified two **Moehrl Certified Classes**.

1. **Rule 23(b)(3) Class:** Consists of home sellers who paid a commission between March 6, 2015, and December 31, 2020, to a brokerage affiliated with a Corporate Defendant in connection with the sale of residential real estate listed on a Covered MLS and in a covered jurisdiction.
2. **Rule 23(b)(2) Class:** Consists of current and future owners of residential real estate in the covered jurisdictions who are presently listing or will in the future list their home for sale on a Covered MLS.

Excluded from both Moehrl Certified Classes are:

- Sales of residential real estate for a price below \$56,500,
- Sales of residential real estate at auction,
- Employees, officers, and directors of defendants,
- The presiding Judge in this case, and the Judge's staff.

A "Covered MLS" includes any MLSs that were NAR-affiliated and whose listings were maintained as of June 30, 2021 by the Covered MLS. The Covered MLSs and jurisdictions are: Bright MLS (Jurisdiction: Delaware, Maryland, District of Columbia, New Jersey, Pennsylvania, Virginia, West Virginia); Carolina/Canopy MLS (North Carolina, South Carolina); Triangle MLS (North Carolina); Stellar MLS (Florida); Miami MLS (Florida); Florida Gulf Coast (Florida); Metro MLS (Wisconsin); Yes MLS/MLS Now (Ohio, West Virginia); Columbus Realtors MLS (Ohio); Northstar MLS (Minnesota, Wisconsin); Wasatch Front/Utah Real Estate (Utah); REcolorado/Metrolist (Colorado); Pikes Peak MLS (Colorado); GLVAR MLS (Nevada); SABOR (Texas);

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

ACTRIS/ABOR (Texas); HAR MLS (Texas); NTREIS (Texas); ARMLS (Arizona); and Realcomp II (Michigan). For purposes of the (b)(2) Class, “Covered MLS” includes any successor of a Covered MLS.

The **Burnett Certified Class** was certified on April 22, 2022 and class certification notice was previously provided to the Burnett Certified Class.

Settlements have been reached with two settling defendants — Anywhere Real Estate, Inc. (f/k/a Realogy Holdings Corp.) and RE/MAX, LLC. The litigation is proceeding against other non-settling defendants in both cases.

For both settlements, the **Settlement Class** consists of all persons who sold a home that was listed on an MLS anywhere in the United States where a commission was paid to any brokerage in connection with the sale of the home in the following date ranges:

- Moehrl MLSs: March 6, 2015 to date of notice
- Burnett MLSs: April 29, 2014 to date of notice
- MLS PIN: December 17, 2016 to date of notice
- All other MLSs: four years prior to the date a new or amended complaint (if any) is filed in the Actions or the date of notice, whichever is earlier, up to date of notice.

CASE INFORMATION

JND’s proposed Notice Plan was designed based on the following case information:

1. The case claims Defendants conspired to impose, implement and enforce anticompetitive restraints that cause home sellers to pay inflated commissions on the sale of their homes.
2. The Class consists of approximately 30 million Class Members nationwide.
3. Email addresses are available for a portion of the Class (Assume 3 Scenarios - email notice to 1 million, 5 million and 10 million Class Members).
4. Postal addresses are available for a portion of the Class (Assume 3 Scenarios - mailed notice to 1 million, 5 million and 10 million Class Members).
5. With the Burnett certification notice effort, addresses were available for the homes sold but not for the locations where sellers moved after the sale; therefore, a robust media/publication plan is needed to supplement the direct notice effort.

MEDIA RESOURCES

JND uses the same reputable syndicated research tools used by top advertising agencies and brand advertisers to ensure that the best media is selected and that our reach calculations can withstand the most critical review and challenge. The media research tools we utilized in our analysis and will use to implement the plan include:

- **MRI:** MRI data was used to analyze the demographics and media usage of potential Class Members, as well as to determine the reach of our proposed print effort. Understanding *who* we are trying to reach is key in determining *how* best to reach them. MRI is a nationally accredited research firm that provides consumer demographics, product and brand usage, and audience/exposure in all forms of advertising media through probabilistic and address-based sampling. MRI is the leading producer of media and consumer research in the United States.
- **Comscore:** JND uses Comscore data to not only analyze where potential Class Members are spending time on the internet, but more importantly, for calculating the reach of our proposed digital effort. Comscore's multi-reach platform allows us to analyze unduplicated audiences (net reach) across multiple platforms (e.g., Google, Facebook) and devices (desktop and mobile). Through the platform, we assess the efficiency and effectiveness of our proposed media plans by reducing waste and improving campaign performance across all devices.
- **Google Active View:** At the time of implementation, our digital experts will verify and monitor our digital placements. Google Active View, which is accredited by the Media Rating Council (MRC), will be used to measure viewable impressions across the web and in apps. Google Active View supports the Interactive Advertising Bureau (IAB) and MRC definition of viewability — a minimum of 50% of the ad is in view for a minimum of one second for display ads. In addition, over a hundred complex algorithms will be used to spot bad traffic as it happens to prevent invalid clicks, impressions, views, or interactions. These efforts prevent impressions from being served and counted when they have not been loaded onto a person's screen.
- **Google Analytics:** JND will place a Google Analytics pixel across all case landing pages to monitor and track website traffic. Through the use of Google Analytics and custom UTM codes, our digital experts will be able to monitor the number of website visits, average time spent per visit, and the number of pages visited per session. Data will be broken down by source, or referring website, in order to make optimizations based on media placements that are driving the longest time on site and the largest number of claim form submissions. Demographic data such as age and gender, will be reviewed and optimized towards those groups who prove to be the most responsive and interactive with the case website.
- **Google Tag Manager:** JND will also place a 'Container Tag' across all case landing pages using Google Tag Manager, a tag management system (TMS) that allows advertisers to place and update measurement codes and code fragments on a landing page from a single source. With these codes placed within the container, website data is passed back to advertising platforms (such as Meta, Google, The Trade Desk), allowing machine learning to take place, optimizing towards placements and audiences that are driving site traffic and claim form submissions. All data collected through Google Tag Manager adheres to Google's Privacy Policies and Principles. No personal identifiable information (PII) is collected.

- **The Trade Desk:** JND places media through The Trade Desk, the leading Demand Side Platform (DSP) that champions transparency, as well as industry-wide collaboration and innovation. The Trade Desk provides JND the same buying power/access to inventory as the biggest Fortune 100 companies. JND has access to nearly any website's banner inventory, streaming video, streaming audio and OTT (over-the-top) inventory. Through The Trade Desk's countless partnerships with data providers, JND also has access to leading technology to target and reach audiences based on criteria such as recent/frequent browsing habits, purchase data, recent and frequent geo locations, and more.

TARGET ANALYSIS

MRI data does not measure home sellers; however, data is available for adults 18 years of age or older (Adults 18+) who are current homeowners ("Homeowners"). Considering that every home seller was a Homeowner, this measurable target best represents potential Class Members.

MRI data indicates that most Homeowners are:

- White (81%)
- 35 years of age or older (80%)
- From higher income households (73% have a household income of \$60K+)
- Educated (67% attended college or beyond)
- Married (63%)

Compared to the general Adult 18+ population, Homeowners are:

- 32% *less likely* to be Black/African American and 26% *less likely* to be Spanish, Hispanic, or Latino
- 28% more likely to be 65 years of age or older and 13% more likely to be 35 years of age or older
- 26% more likely to be retired
- 24% more likely to have a household income of \$150,000 or more
- 20% more likely to be married
- 13% more likely to have a bachelor's or post-graduate degree

MEDIA USAGE

In terms of media usage, MRI data indicates that Homeowners are active internet users. Over a 30-day period:

- 98% are on the internet
- 87% use their cellphone or smartphone to access the internet
- 64% visit Facebook, while over 34% visit Instagram

NOTICE PLAN STRATEGIES

JND recommends a combination of direct notice and paid media notice to reach at least 70% of potential Class Members.

Three notice scenarios have been created:

- Scenario 1: Direct Notice to 1 million Class Members + Print and Digital Notice
- Scenario 2: Direct Notice to 5 million Class Members + Digital Notice
- Scenario 3: Direct Notice to 10 million Class Members + Digital Notice

To extend notice exposure further, additional efforts such as an internet search campaign, the distribution of a national press release, and sponsorships with popular class action websites are recommended, but not required. JND will also establish and maintain an informational interactive case website, toll-free number, post office box, and email address for this matter.

SCENARIO 1: DIRECT NOTICE (1M) + PRINT + DIGITAL

JND proposes direct notice combined with an extensive media campaign consisting of a popular consumer magazine (*Better Homes & Gardens*), the leading digital network (Google Display Network – “GDN”), the top social media platform (Facebook), and a respected programmatic partner (OMTD).

Direct Notice Effort

Direct notice will be sent to all Class Members for whom an email or postal address is available. Scenario 1 assumes contact information will be available for 1 million Class Members.

Print Effort

One notice insertion will be placed in ***Better Homes & Gardens*** magazine to extend reach, particularly among Class Members who may not frequent the internet. With an average national circulation of 3.1 million and a readership of 18 million, *Better Homes & Gardens* reaches 11% of adults 35 years of age or older (“Adults 35+”), an age group that represents a large majority of Class Members, per MRI data. The Publication Notice will include a QR code so readers may use their mobile phones/tablets to scan and quickly access the case website.

Digital Effort

Based on the estimated direct notice and print reach, JND recommends **311 million digital impressions** in order to achieve a combined reach goal of at least 70%.² All impressions will be served over six weeks to Adults 35+ with focused targeting included. A portion of the **GDN** impressions will target homeowners and/or users who have searched on Google for key terms such as Burnett MLSs, Moehrl MLSs, Three MLSs, MLS PIN, Five MLSs, Bright MLS, Six MLSs, Four MLSs, My Florida Regional. A portion of the **Facebook** impressions will target users who recently moved or expressed an interest in homeowner association, moving company, real estate. All of the programmatic impressions on **OMTD** will target users based on “length of residency”

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

being between 3-10 years and those who are likely homeowners or anyone who sold a house 1+ years ago.

In addition, multiple targeting strategies will be used, including the following techniques:

- **Predictive Targeting** (GDN only) uses multiple data points (search queries, sites visited, and digital behavior trends) to make inferences regarding future behavior/performance for a given campaign.
- **Audience Targeting** optimizes efforts based on demographics, behavior, and interests of potential Class Members.
- **Geotargeting** optimizes efforts based on the location of potential Class Members.
- **Keyword Targeting** allows advertisers to target users based on their search queries, recent social media posts or engagement with websites or posts that feature specific keywords.
- **Machine Learning** is used across all digital media platforms in order to optimize campaigns in real time based on placements, times of day and sub-targets within the larger demo and geo target that are likely to drive claim form submissions.

The digital activity will be served across all devices (desktop, laptop, tablet and mobile), with a heavy emphasis on mobile devices. The digital ads will directly link to the case website, where Class Members may access more information about the case, including the long form notice, as well as file a claim electronically.

Scenario 1 Reach

To calculate print and digital reach, JND used MRI and a Comscore reach and frequency platform. According to our direct notice reach estimate and these two reputable media reach platforms, the combined notice efforts will reach approximately 72% of likely Class Members on average 2.8 times each. As described further below in “Additional Notice – Extended Exposure,” the internet search campaign, the distribution of the national press release, and the class action site sponsorships will extend reach further. The provided reach is similar to that of other court approved programs and meets the standard set forth by the FJC.

SCENARIO 2: DIRECT NOTICE (5M) + DIGITAL

JND proposes direct notice combined with a digital effort with the leading digital network (GDN), the top social media platform (Facebook), and a respected programmatic partner (OMTD).

Direct Notice Effort

Direct notice will be sent to all Class Members for whom an email or postal address is available. Scenario 2 assumes contact information will be available for 5 million Class Members.

Digital Effort

Based on the estimated direct notice reach, JND recommends **311 million digital impressions** in order to achieve a combined reach goal of at least 70%. All impressions will be served over six weeks to Adults 35+ with focused targeting included. A portion of the **GDN** impressions will target homeowners and/or users who have searched on Google for key terms such as Burnett MLSs, Moehrl MLSs, Three MLSs, MLS PIN, Five MLSs, Bright MLS, Six MLSs, Four MLSs, My Florida Regional. A portion of the **Facebook** impressions will target users who recently moved or expressed

an interest in homeowner association, moving company, real estate. All of the programmatic impressions on **OMTD** will target users based on “length of residency” being between 3-10 years and those who are likely homeowners or anyone who sold a house 1+ years ago.

In addition, multiple targeting strategies will be used, including predictive targeting (GDN only), audience targeting, geotargeting, keyword targeting, and machine learning, as outlined above in Scenario 1.

The digital activity will be served across all devices (desktop, laptop, tablet and mobile), with a heavy emphasis on mobile devices. The digital ads will directly link to the case website, where Class Members may access more information about the case, including the long form notice, as well as file a claim electronically.

Scenario 2 Reach

To calculate digital reach, JND used a Comscore reach and frequency platform. According to our direct notice reach estimate and this reputable digital reach platform, the combined notice efforts will reach approximately 73% of likely Class Members on average 2.8 times each. As described further below in “Additional Notice – Extended Exposure,” the internet search campaign, the distribution of the national press release, and the class action site sponsorships will extend reach further. The provided reach is similar to that of other court approved programs and meets the standard set forth by the FJC.

SCENARIO 3: DIRECT NOTICE (10M) + DIGITAL

JND proposes direct notice combined with a digital effort with the leading digital network (GDN), the top social media platform (Facebook), and a respected programmatic partner (OMTD).

Direct Notice Effort

Direct notice will be sent to all Class Members for whom an email or postal address is available. Scenario 3 assumes contact information will be available for 10 million Class Members.

Digital Effort

Based on the estimated direct notice reach, JND recommends **219 million digital impressions** in order to achieve a combined reach goal of at least 70%. All impressions will be served over six weeks to Adults 35+ with focused targeting included. A portion of the **GDN** impressions will target homeowners and/or users who have searched on Google for key terms such as Burnett MLSs, Moehrl MLSs, Three MLSs, MLS PIN, Five MLSs, Bright MLS, Six MLSs, Four MLSs, My Florida Regional. A portion of the **Facebook** impressions will target users who recently moved or expressed an interest in homeowner association, moving company, real estate. All of the programmatic impressions on **OMTD** will target users based on “length of residency” being between 3-10 years and those who are likely homeowners or anyone who sold a house 1+ years ago.

In addition, multiple targeting strategies will be used, including predictive targeting (GDN only), audience targeting, geotargeting, keyword targeting, and machine learning, as outlined above in Scenario 1.

The digital activity will be served across all devices (desktop, laptop, tablet and mobile), with a heavy emphasis on mobile devices. The digital ads will directly link to the case website, where Class Members may access more information about the case, including the long form notice, as well as file a claim electronically.

Scenario 3 Reach

To calculate digital reach, JND used a Comscore reach and frequency platform. According to our direct notice reach estimate and this reputable digital reach platform, the combined notice efforts will reach approximately 71% of likely Class Members on average 2.3 times each. As described further below in “Additional Notice – Extended Exposure,” the internet search campaign, the distribution of the national press release, and the class action site sponsorships will extend reach further. The provided reach is similar to that of other court approved programs and meets the standard set forth by the FJC.

ADDITIONAL NOTICE – EXTEND EXPOSURE

To further extend reach and notice exposure, JND proposes several additional notice options such as an internet search campaign, a national press release, and sponsorships with popular class action websites.

Internet Search

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

Press Release

To further assist in getting “word of mouth” out about the case, JND proposes the distribution of a **press release** at the start of the campaign to over 11,000 media outlets nationwide.

Class Action Site Sponsorships

Certain class action websites are frequented for updates on class action lawsuits. These sites, help drive potential class members to the case specific website. As a result, we propose sponsorship opportunities with TopClassActions.com and ClassAction.org.

CLASS COMMUNICATIONS

JND will establish and maintain an informational and interactive, **case-specific website**, which will have an easy-to-navigate design and will be formatted to emphasize important information and deadlines. The website will include a page with answers to frequently asked questions, contact information, key dates, and links to important case documents including the Long Form Notice. The website will also include information on how potential Class Members can opt-out of or object, if they choose. The website address will be prominently displayed in all printed notice documents, and accessible through the email and digital notices.

The case website will feature an online claim form. JND will work with the parties to design the online claims submission process to be streamlined and efficient for Class Members. Additionally, a claim form will be posted on the case website for download for Class Members who prefer to submit a claim form by mail.

The case website will be ADA-compliant and optimized for mobile visitors so that information loads quickly on mobile devices and will also be designed to maximize search engine optimization through Google and other search engines. Keywords and natural language search terms will be included in the site's metadata to maximize search engine rankings.

JND will establish and maintain a 24-hour, **toll-free telephone line** that Class Members can call to obtain information about the case; a dedicated **email address** to receive and respond to Class Member inquiries; and a **post office box** to receive Class Member correspondence, paper Claim Forms, and exclusion requests.

Scenario 1 – Direct Notice (1M) + Print + Digital

DIRECT NOTICE EFFORT	DETAILS
	Send direct notice to 1M known Class Members
PRINT EFFORT	DETAILS
	- One third page insertion with a QR code for easy, direct access to the case site through mobile devices - Monthly lifestyle magazine - Circulation of 3.1 million - Readership of over 18 million - Reaches 11% of Adults 35+ - Extends reach to a broad demographic segment, including Class Members who may not frequent the internet
TOTAL	One Insertion
DIGITAL EFFORT	DETAILS
	- Display banner ads - Target Adults 35+ - Portion allocated to homeowners and/or users who have searched on Google for terms such as Burnett MLSSs, Moehrl MLSSs, Three MLSSs, MLS PIN, Five MLSSs, Bright MLS, Six MLSSs, Four MLSSs, My Florida Regional - Utilize predictive, audience, geo, and machine learning targeting - Serve across all devices (desktop, laptop, tablet and mobile), with an emphasis on mobile
	- Feed, Stories placements - Target Adults 35+ - Portion allocated to users who recently moved or expressed an interest in homeowner association, moving company, real estate - Utilize audience, geo, and machine learning targeting - Serve across all devices
	- Display banner ads - Target Adults 35+ with "length of residency" being 3-10 years and who are likely homeowners or anyone who sold a house 1+ years ago - Utilize audience, geo, and machine learning targeting - Serve across all devices
TOTAL	311 million impressions over 6 weeks

Scenario 2 – Direct Notice (5M) + Digital

DIRECT NOTICE EFFORT	DETAILS
	Send direct notice to 5M known Class Members
DIGITAL EFFORT	DETAILS
	- Display banner ads - Target Adults 35+ - Portion allocated to homeowners and/or users who have searched on Google for terms such as Burnett MLSSs, Moehrl MLSSs, Three MLSSs, MLS PIN, Five MLSSs, Bright MLS, Six MLSSs, Four MLSSs, My Florida Regional - Utilize predictive, audience, geo, and machine learning targeting - Serve across all devices (desktop, laptop, tablet and mobile), with an emphasis on mobile
	- Feed, Stories placements - Target Adults 35+ - Portion allocated to users who recently moved or expressed an interest in homeowner association, moving company, real estate - Utilize audience, geo, and machine learning targeting - Serve across all devices
	- Display banner ads - Target Adults 35+ with “length of residency” being 3-10 years and who are likely homeowners or anyone who sold a house 1+ years ago - Utilize audience, geo, and machine learning targeting - Serve across all devices
TOTAL	311 million impressions over 6 weeks

Scenario 3 – Direct Notice (10M) + Digital

DIRECT NOTICE EFFORT	DETAILS
	Send direct notice to 10M known Class Members
DIGITAL EFFORT	DETAILS
	- Display banner ads - Target Adults 35+ - Portion allocated to homeowners and/or users who have searched on Google for terms such as Burnett MLSs, Moehrl MLSs, Three MLSs, MLS PIN, Five MLSs, Bright MLS, Six MLSs, Four MLSs, My Florida Regional - Utilize predictive, audience, geo, and machine learning targeting - Serve across all devices (desktop, laptop, tablet and mobile), with an emphasis on mobile
	- Feed, Stories placements - Target Adults 35+ - Portion allocated to users who recently moved or expressed an interest in homeowner association, moving company, real estate - Utilize audience, geo, and machine learning targeting - Serve across all devices
	- Display banner ads - Target Adults 35+ with “length of residency” being 3-10 years and who are likely homeowners or anyone who sold a house 1+ years ago - Utilize audience, geo, and machine learning targeting - Serve across all devices
TOTAL	219 million impressions over 6 weeks

ADDITIONAL NOTICE

INTERNET SEARCH	DETAILS
	• Responsive Search (Text) Ads • Purchase case related Keyword List

PRESS RELEASE	DETAILS
	• Issued at the start of the campaign • Distributed to over 11,000 media outlets nationwide

CLASS ACTION WEBSITES	DETAILS
	• Featured Newsletter Placements – Once in the “New Settlements” section and once in the “Ending Soon” section; 200K+ subscribers • Featured Settlement Page Placement - Primary positioning for two weeks; 30K pageviews/week • Dedicated Informational Page • Standard Social Media Post - Classaction.org Facebook page and Twitter account
	• Featured Settlement Listing - Prime placement on homepage and Open Settlements page • Featured Newsletter Placement - Delivers to 900,000 consumers weekly • Social Media Promotion – to 145K Facebook followers

CLASS COMMUNICATIONS

COMMUNICATIONS	DETAILS
	• Establish case website, toll-free line, email address, and post office box

OTHER MEDIA CONSIDERATIONS – FURTHER EXPOSURE

To increase reach to Class Members *beyond* what is necessary for a due process program, JND explored other innovative media platforms to extend notice exposure further. These platforms may include: streaming audio (Audiology, Spotify, Pandora, SiriusXM), streaming video (Discovery Channels, various publisher sites such as NBC Universal, Fox) and broadcast radio (iHeart Radio). The media options shown below may be implemented at an additional cost separate from the notice plan presented above.

OTHER MEDIA CONSIDERATIONS

STREAMING AUDIO	DETAILS
	• :30 audio spots • Target Adults 35+ with “length of residency” being 3-10 years and who are likely homeowners or anyone who sold a house 1+ years ago • Music genres may include Adult AC, Contemporary hits, Country, etc. • Total delivery and cost are scalable depending on campaign duration and budget
	• :30 audio spots to run over a minimum of 2 weeks • Target Adults 18+ • Music genres may include Adult AC, Contemporary hits, Country, Hip Hop, etc. • Minimum duration of 2 weeks for \$30K
STREAMING VIDEO	DETAILS
	• :30 video spots • Target Adults 18+ on the Discovery Channels (i.e. HGTV, Food Network, etc.) • Target Adults 35+ with “length of residency” being 3-10 years and who are likely homeowners or anyone who sold a house 1+ years ago on various publishers such as NBC Universal, Fox, etc. • QR code will appear in the ad for easy, direct access to the case site through mobile devices • Total delivery and cost are scalable depending on campaign duration and budget
BROADCAST RADIO	DETAILS
	• :30 audio spots • Target Adults 18+ on AM/FM stations and formats nationwide • Total delivery and cost are scalable depending on campaign duration and budget

— EXHIBIT 5 —
Menu Pricing

Notice to 1 Million Class Members

Moehrl and Burnett Settlements

KEY STATIC ASSUMPTIONS:

Estimated class size of 30,000,000
 Project duration of 4 months
 Assumes email notice with all email addresses available
 Assumes 6 x 9 B&W Postcard mailed with all addresses available
 Assumes 20% returned mail rate of which 65% are remailed
 Assumes 10,000 IVR minutes

	Rate	Quantity	Amount
Data Intake, Deduping and Address Updates	\$145	30 Hours	\$4,350
NCOA Charges	Waived	Waived	Waived
Email Short-form Notice	\$0.01	1,000,000	\$10,000
Print & mail Short-form Notices on 6 x 9 B&W Postcard ¹	\$0.06	1,000,000	\$60,000
Track & Research Undeliverable Mail	\$0.05	200,000	\$10,000
Remail to Forwarding and New Addresses	\$0.06	130,000	\$7,800
Assist with Designing Short-form & Long-form Notices	\$210	20 Hours	\$4,200
Preparation of Required Declarations	\$290	10 Hours	\$2,900
Design & Develop Dedicated Website	\$185	75 Hours	\$13,875
Monthly Website Hosting & Maintenance Charge	Waived	Waived	Waived
IVR Setup	\$2,500	1	\$2,500
Monthly Phone Maintenance	\$175	4 Months	\$700
IVR Minutes	\$0.19	10,000	\$1,900
Track, Process & Report on Objections & Opt Outs	\$90	20 Hours	\$1,800
Email Two Reminder Notices	\$0.01	1,850,000	\$18,500
Media Plan Cost, Including Press Release (See Exhibit 4)	\$286,500	1	\$286,500
Project Oversight and Other Required Tasks ²	\$145	80 Hours	\$11,600
Postage for Notice and Remails ³	\$0.359	1,130,000	\$405,670
TOTAL FEES AND POSTAGE:			\$842,295

Domain Costs	\$100/Year
PO Box Charges	\$175/Month
Hard Copy Box Storage	\$2.50/Box/Month
Data Security and Storage	\$0.006/Record/Month
Photocopying Charges	\$0.25/Page

¹Providing notice on a 6 x 9 Color Postcard would result in a price increase of approximately \$0.01 per item.

²Project Oversight and Other Required Tasks includes interaction with parties, system support and database management, resolution of issues and supervision of the project team and notice project .

³Postage is estimated and JND will pass along the lowest available postage rate for all mailings.

Notice to 5 Million Class Members

Moehrl and Burnett Settlements

KEY STATIC ASSUMPTIONS:

Estimated class size of 30,000,000
 Project duration of 4 months
 Assumes email notice with all email addresses available
 Assumes 6 x 9 B&W Postcard mailed with all addresses available
 Assumes 20% returned mail rate of which 65% are remailed
 Assumes 10,000 IVR minutes

	Rate	Quantity	Amount
Data Intake, Deduping and Address Updates	\$145	40 Hours	\$5,800
NCOA Charges	Waived	Waived	Waived
Email Short-form Notice	\$0.007	5,000,000	\$35,000
Print & mail Short-form Notices on 6 x 9 B&W Postcard ¹	\$0.06	5,000,000	\$300,000
Track & Research Undeliverable Mail	\$0.05	1,000,000	\$50,000
Remail to Forwarding and New Addresses	\$0.06	650,000	\$39,000
Assist with Designing Short-form & Long-form Notices	\$210	20 Hours	\$4,200
Preparation of Required Declarations	\$290	10 Hours	\$2,900
Design & Develop Dedicated Website	\$185	75 Hours	\$13,875
Monthly Website Hosting & Maintenance Charge	Waived	Waived	Waived
IVR Setup	\$2,500	1	\$2,500
Monthly Phone Maintenance	\$175	4	\$700
IVR Minutes	\$0.19	10,000	\$1,900
Track, Process & Report on Objections & Opt Outs	\$90	20 Hours	\$1,800
Email Two Reminder Notices	\$0.007	9,250,000	\$64,750
Media Plan Cost, Including Press Release (See Exhibit 4)	\$231,200	1	\$231,200
Project Oversight and Other Required Tasks ²	\$145	90 Hours	\$13,050
Postage for Notice and Remails ³	\$0.357	5,650,000	\$2,017,050
TOTAL FEES AND POSTAGE:			\$2,783,725

Domain Costs	\$100/Year
PO Box Charges	\$175/Month
Hard Copy Box Storage	\$2.50/Box/Month
Data Security and Storage	\$0.006/Record/Month
Photocopying Charges	\$0.25/Page

¹Providing notice on a 6 x 9 Color Postcard would result in a price increase of approximately \$0.01 per item.

²Project Oversight and Other Required Tasks includes interaction with parties, system support and database management, resolution of issues and supervision of the project team and notice project .

³Postage is estimated and JND will pass along the lowest available postage rate for all mailings.

Notice to 10 Million Class Members

Moehrl and Burnett Settlements

KEY STATIC ASSUMPTIONS:

Estimated class size of 30,000,000
 Project duration of 4 months
 Assumes email notice with all email addresses available
 Assumes 6 x 9 B&W Postcard mailed with all addresses available
 Assumes 20% returned mail rate of which 65% are remailed
 Assumes 10,000 IVR minutes

	Rate	Quantity	Amount
Data Intake, Deduping and Address Updates	\$145	50 Hours	\$7,250
NCOA Charges	Waived	Waived	Waived
Email Short-form Notice	\$0.006	10,000,000	\$60,000
Print & mail Short-form Notices on 6 x 9 B&W Postcard ¹	\$0.06	10,000,000	\$600,000
Track & Research Undeliverable Mail	\$0.05	2,000,000	\$100,000
Remail to Forwarding and New Addresses	\$0.06	1,300,000	\$78,000
Assist with Designing Short-form & Long-form Notices	\$210	20 Hours	\$4,200
Preparation of Required Declarations	\$290	10 Hours	\$2,900
Design & Develop Dedicated Website	\$185	75 Hours	\$13,875
Monthly WebsitedHosting & Maintenance Charge	Waived	Waived	Waived
IVR Setup	\$2,500	1	\$2,500
Monthly Phone Maintenance	\$175	4 Months	\$700
IVR Minutes	\$0.19	10,000	\$1,900
Track, Process & Report on Objections & Opt Outs	\$90	20 Hours	\$1,800
Email Two Reminder Notices	\$0.006	18,500,000	\$111,000
Media Plan Cost, Including Press Release (See Exhibit 4)	\$181,550	1	\$181,550
Project Oversight and Other Required Tasks ²	\$145	100 Hours	\$14,500
Postage for Notice and Remails ³	\$0.355	11,300,000	\$4,011,500
TOTAL FEES AND POSTAGE:			\$5,191,675

Domain Costs	\$100/Year
PO Box Charges	\$175/Month
Hard Copy Box Storage	\$2.50/Box/Month
Data Security and Storage	\$0.006/Record/Month
Photocopying Charges	\$0.25/Page

¹Providing notice on a 6 x 9 Color Postcard would result in a price increase of approximately \$0.01 per item.

²Project Oversight and Other Required Tasks includes interaction with parties, system support and database management, resolution of issues and supervision of the project team and notice project .

³Postage is estimated and JND will pass along the lowest available postage rate for all mailings.

— EXHIBIT 6 —
Hourly Billing Rates

HOURLY BILLING RATES

POSITION/TITLE	RATE
Senior Executive	\$ 650
Executive	\$ 395
Senior Vice President	\$ 375
Vice President	\$ 325
Senior Director/Senior Consultant/Media Director	\$ 275
Director/Software Engineer/Network Administrator	\$ 210
Assistant Director/Controller	\$ 180
Senior Project Manager/Senior Data Analyst	\$ 160
Project Manager/Data Analyst/Helpdesk Administrator/ Manager/Contact Center Manager	\$ 135
Assistant Project Manager/Junior Data Analyst/ Contact Center Supervisor/Contact Center Lead/ Inbound Mail Supervisor/Outbound Mail Supervisor/ Senior Staff Accountant	\$ 100
Senior Associate/Staff Accountant	\$ 90
Associate/Contact Center Agent	\$ 65
Inbound Mail Specialist/Outbound Mail Specialist	\$ 50

All services to be provided by JND Legal Administration ("JND") are subject to the following terms and conditions:

1. **SERVICES:** JND agrees to perform all services necessary to complete the tasks outlined in the applicable proposal or other documents or per its understanding about the Client assignment. Such Services do not in any way constitute legal services or advice.
2. **PAYMENT:** The Client agrees to pay JND for the Services as outlined in the Proposal or other agreement between the parties. Client agrees and understands that fees charged by JND may include mark-ups, commissions, or other arrangements constituting potential profits to JND. Client further agrees that the prices to be charged by JND were negotiated at arm's length and that total fees are estimates and that the actual amount charged may be greater or lesser than the estimated amounts. JND reserves the right to increase its hourly rates annually.
3. **EXPENSES:** JND shall also bill for all expenses reasonably incurred in connection with the Services. These expenses include but are not limited to postage, FedEx, P.O. Box rental (\$165/month), travel, copies (\$0.25 per copy), box storage (\$2.50/box per month), brokerage fees, accounting fees, electronic storage (\$0.006 per image/record), and other items associated with the Services. JND may receive rebates or credits from vendors in connection with volume of work performed for all of its Clients. JND may also receive financial benefits from banks or other institutions based on settlement funds on deposit. These credits/rebates/awards are solely the property of JND. JND reserves the right to increase these expenses annually.
4. **BILLING:** JND shall invoice clients every 30 days and expect payment within thirty (30) days of receipt of invoices. Payment for postage and printing is due in advance of mailing. Invoices not paid within thirty (30) days will be subject to a 1.5% monthly finance charge.
5. **INDEPENDENT CONTRACTOR:** JND is performing its Services as an Independent Contractor and neither it nor its employees shall be deemed to be employees of the Client.
6. **CONFIDENTIALITY:** JND and the Client will each treat as confidential any documents shared by one party with the other. JND does not convey to the Client any right in the programs, systems, or methodologies used or provided by JND in the performance of this assignment.
7. **DATA PRIVACY:** JND is committed to taking all reasonable steps to ensure the security of all client and claimant data entrusted to our care. We seek to protect confidential data in all of our engagements, including this one, regardless of the size of the matter or the amount of data at issue. Please see JND's complete Privacy Policy at www.jndla.com/privacy-policy regarding data collection and use.
8. **LIMITATION OF DAMAGES:** JND is not responsible to the Client for any special, consequential or incidental damages incurred by Client and any liability of JND to the Client shall not exceed the total amount billed to the Client for the particular Services that give rise to any loss.
9. **FORCE MAJEURE:** If any event out of the reasonable control of JND prevents JND's performance, such performance shall be excused.
10. **NOTICE:** Any notice required in connection with the Services shall be in writing and sent by registered mail or overnight courier. Such notice is deemed given if mailed five days after the date of deposit in the U.S. mail, or if sent by overnight courier, one business day after delivery to such courier.
11. **GOVERNING LAW:** This contract will be governed by and construed by the laws of the State of Washington.
12. **ASSIGNMENT:** This Agreement and the rights and obligations of JND and the Client shall inure to the benefit of their successors and assigns, if any.
13. **TERMINATION:** This Agreement may be terminated by the Client upon at least 30 days prior written notice to JND. The Client's obligation to pay for services or projects in progress at the time of notice of withdrawal shall continue throughout the 30 day period. JND may terminate this Agreement (i) with 10 days prior written notice if the Client is not current in payment of charges or (ii) in any event, upon at least three months prior written notice to the Client. If Client terminates this Agreement, JND shall have no obligation to release any information or documentation related to the applicable matter until JND has been paid in full.