

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

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

Plaintiffs,

v.

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

Defendants.

Case No. 19-CV-00332-SRB

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

Plaintiffs,

v.

NATIONAL ASSOCIATION OF
REALTORS, et al.,
Defendants.

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

DECLARATION OF JENNIFER M. KEOUGH

I, Jennifer M. Keough, declare as follows:

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

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

2. I previously submitted Declarations in this matter dated June 9, October 22, November 20, 2025, January 14, 2026, and April 10, 2026, providing quarterly accounting of all fees and charges requested from the Settlement Fund by JND pursuant to the Court's Order, dated May 7, 2025. Those declarations are incorporated herein by reference.

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

4. Since my last Declaration in this matter, dated April 10, 2026, JND submitted three invoices to the following plaintiff firms; Cohen Milstein Sellers & Toll PLLC, Hagens Berman Sobol Shapiro LLP, and William Dirks Cameron LLC, for its continued work on this administration. The invoices are for \$203,393.60, \$82,461.76, and \$52,460.94 respectively and redacted copies are attached hereto as Exhibit A.

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

6. None of the individual attorneys or firms representing Plaintiffs in this action have any ownership or other financial interest in JND. JND has not and will not offer or provide any compensation of any kind (including but not limited to rebates, awards, credits, or other financial benefits) to any outside person or entity regarding this litigation.

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

Executed on July 17, 2026, in Seattle, Washington.



JENNIFER M. KEOUGH

EXHIBIT A



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 #
5/21/2026	177132

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (April 1 - 30, 2026)		
	Call Center		
1	Monthly TFN Hosting	200.00	200.00
4,121.1	Monthly IVR Minutes	0.19	783.01
236.5	Class Member Communications	83.00	19,629.50
	Process Forms		
99	Paper Claims	5.95	589.05
1,935	Online Claims	0.95	1,838.25
51.75	Tax Reporting	106.00	5,485.50
141.75	Project Oversight/ Database Management	203.00	28,775.25
	Expenses:		
	OCF Hosting	645.64	645.64
	Copy Charges	261.75	261.75
2	PO Box	250.00	500.00
140	Box Storage	2.75	385.00
	Electronic Data Storage	13,740.64	13,740.64
3,493	Fraudulent Claims Prevention Tool	0.0018	6.29
	Postage	1,053.72	1,053.72
37	Tax Filing Fees 2025	3,500.00	129,500.00

Invoice Total \$203,393.60

Payment Instructions

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

Total Balance Due

\$285,855.36



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 #
6/25/2026	177403

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (May 1 - 31, 2026)		
1	Call Center		
3,202.49	Monthly TFN Hosting	200.00	200.00
	Monthly IVR Minutes	0.19	608.47
179	Class Member Communications	79.00	14,141.00
	Process Forms		
2	Paper Claims	5.95	11.90
1,113	Online Claims	0.95	1,057.35
29.25	Tax Reporting	82.00	2,398.50
237.5	Project Oversight/ Database Management	205.00	48,687.50
	Expenses:		
	OCF Hosting	644.14	644.14
	Copy Charges	42.50	42.50
2	PO Box	250.00	500.00
140	Box Storage	2.75	385.00
	Electronic Data Storage	13,741.75	13,741.75
1,697	Fraudulent Claims Prevention Tool	0.0018	3.05
	Court Transcript	40.60	40.60

Invoice Total \$82,461.76

Payment Instructions

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

Total Balance Due

\$285,855.36



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 #
7/14/2026	177504

PROJECT	TERMS
NAR - National Association of Realtors Se	Net 30

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (June 1 - 30, 2026)		
1.5	Call Center	90.00	135.00
1	Monthly TFN Hosting	200.00	200.00
2,584.41	Monthly IVR Minutes	0.19	491.04
138.75	Class Member Communications	79.00	10,961.25
	Process Forms		
956	Online Claims	0.95	908.20
21	Tax Reporting	103.00	2,163.00
98.5	Project Oversight/ Database Management	224.00	22,064.00
	Expenses:		
	OCF Hosting	803.35	803.35
	Copy Charges	81.75	81.75
2	PO Box	250.00	500.00
	Box Storage	399.51	399.51
	Electronic Data Storage	13,742.71	13,742.71
1,429	Fraudulent Claims Prevention Tool	0.0018	2.57
	Postage and Supplies	8.56	8.56

Invoice Total \$52,460.94

Payment Instructions

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

Total Balance Due

\$338,316.30