IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

DON GIBSON, LAUREN CRISS, JOHN MEINERS, and DANIEL UMPA, individually and on behalf of all others similarly situated,	)	
Plaintiffs,	)	Case No. 4:23-cv-00788-SRB
v.	)	
THE NATIONAL ASSOCIATION OF REALTORS, et al.,	)	
Defendants.	)	

SUPPLEMENT TO CLASS COUNSEL REPONSE TO COURT'S DISCLOSURE ODER

Class Counsel filed their previous disclosure on August 28, 2025. Doc. # 794. In the meantime, they informed the Court that they plan to change escrow agents. Class Counsel filed their most recent disclosures in *Keel v. Charles Ruttenberg et al*, Case No. 25-cv-00759 (Doc. # 34). Class Counsel hereby supplement Doc. # 794 with these most recent disclosures that include the change of escrow agent to Morgan Stanley. The disclosures are attached as Exhibits 1-6. No other supplementation is necessary at this time.

DATED: October 24, 2025

Respectfully submitted,

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Attorneys for Plaintiffs

Exhibit 1

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

DON GIBSON, LAUREN CRISS, JOHN MEINERS, and DANIEL UMPA, individually and on behalf of all others similarly situated,	)	
Plaintiffs,	)	
v.	)	Case No. 23-cv-00788-SRB
THE NATIONAL ASSOCIATION OF REALTORS, et al.,	)	
Defendants.	)	

DECLARATION OF MICHAEL KETCHMARK

I, Michael Ketchmark, state the following under penalty of perjury. I further state that I understand my continuing obligation to immediately supplement this affidavit if circumstances change in any way that modifies or changes any of these answers. I have reviewed all of the affidavits from co-counsel and have no issues with the matters raised.

1. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any company or entity that is financing the litigation for this matter? Please describe your investigation and its results.

   Answer: No. I conducted a thorough investigation by reviewing my firm's financial records, consulting with all attorneys and relevant employees, and inquiring with co-counsel. No such relationships were identified.

2. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank, private equity fund, hedge fund, settlement administrator, vendor, or similar institution (except for holdings in mutual funds that do not grant control over such entities) that has a role in this litigation? Please describe your investigation and its results.

   Answer: No, concerning my firm and all co-counsel, with two immaterial exceptions. First, Hagens Berman Sobol Shapiro LLP ("Hagens Berman"), which has a pre-existing banking relationship with Huntington Bank. It is customary for law firms to have banking relationships to support their ongoing operations. Huntington Bank is a lender to Hagens Berman. As part of our investigation, I, along with Eric Dirks, interviewed a bank senior officer. I verified that the terms and conditions associated with the banking relationship with Hagens Berman were the same as with any other customers and that there were no favorable terms, conditions, discounts, or rebates offered to the firm. Second, I was advised that, in 2021, Huntington's parent company acquired TCF Financial Corporation, which owned Winthrop Resources Corporation. Susman Godfrey LLP ("Susman Godfrey") represented Winthrop in unrelated, pending litigation at the time of the transaction. I have further been advised that the terms of Susman Godfrey's representation of Winthrop did not change following the acquisition, and Susman Godfrey has not represented Winthrop since that matter closed approximately three years ago. We are in the process of moving the escrow funds in this and the related real estate litigation from Huntington Bank to Morgan Stanley. I examined all questions in this disclosure with respect to Morgan Stanley. There are no issues under any of these questions. I do want to note, however, that our law firm, as one of our co-counsel, use Morgan Stanley and its local affiliate, the Ferguson Smith Coehn Group for our firm retirement accounts. In addition, our attorneys use Morgan Stanely and its local affiliate for our personal investments. This is a long-standing relationship and neither receive nor would ask for or accept any preferential treatment based upon Morgan Stanley handing the escrow funds in this case.

My investigation involved examining firm accounting documents, employee interviews, and co-counsel statements. Other than the above, no relevant relationships exist other than minor matters outlined in the various affidavits.

3. Have you, your firm, any firm partner or employee, or any co-counsel accepted anything of value from any bank, settlement administrator, or vendor who is or might provide services in this matter more than $250 (excluding the sponsorship of a large event or dinner)? Please describe your investigation and its results.

   Answer: No concerning my firm. I conducted interviews and inquired about firm personnel and co-counsel. Nothing exceeding $250 was accepted other than those identified in the Affidavit of Steve W. Berman.

4. Do you, your firm, or any co-counsel have any financing that is contingent upon the outcome of this litigation? Please describe your investigation and its results. If yes, the following questions shall be answered:

   Answer: No. Investigation included review of my firm's financing agreements and discussions with co-counsel. No contingent financing was found. Subparts a-c are therefore not applicable.

5. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any litigation lending companies that would provide funds directly to potential claimants in this case? Please describe your investigation and its results.

   Answer: No. I checked firm associations, partner investments, and co-counsel disclosures. No such relationships were discovered.

6. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect), including but not limited to as an investor, Officer, Director, employee, or contractor, with any party or client/claimant involved in this MDL or class action (other than a written retainer or engagement agreement for a client in this case)? Please describe your investigation and its results.

   Answer: No. Investigation encompassed interviews with all firm lawyers and internal consultations. No additional relationships exist. It is possible that certain firm partners or employees or their relatives may have small non-controlling stock interests through their passive ownership of mutual funds or ETFs in defendants that are publicly traded corporations.

7. Do you, any firm partner or employee, or any co-counsel partner or employee have any personal relationship (including but not limited to familial, romantic, or financial/business) with any party, client, claimant, counsel, or vendor involved in this MDL or class action? Please describe your investigation and its results.

   Answer: no. No personal relations were identified. I interviewed all partners, attorneys and staff at my firm. As the court is aware, however, all co-counsel are also involved in the related litigation in front of this Court. All co-counsel have various written agreements concerning compensation and the division of fees. No relevant relationships exist other than minor matters outlined in the various affidavits. In addition, there are more than 2 million claims that were submitted, and it is certainly possible that some of these claimants are friends, relatives, or business associates of one or more of the hundreds of employees of various lead counsel. However, all claimants are treated the same regardless of this fact.

8. Do you, your firm, any firm partner or employee, or any co-counsel represent any present parties or claimants in this litigation who you have represented in any other capacity or in any other court (either currently or within the past 3 years)? Please describe your investigation and its results.

   Answer: No. I interviewed all firm personnel and reviewed our client databases. No prior representations overlap. As the court is aware, however, all co-counsel are also involved in the related litigation in front of this Court and the related Moehrl litigation in the Northern District of Illinois.

9. Do you, your firm, any firm partner or employee, or any co-counsel have any financial interest (direct or indirect) in any similar claims or lawsuits filed or registered by any other counsel in this MDL or class action? Please describe your investigation and its results.

   Answer: No. I examined firm case files, investment records, and co-counsel interests. No financial interest in similar claims was found. As the court is aware, however, all co-counsel are also involved in the related litigation before this Court and the Moehrl litigation.

10. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank or financial institution for lending services or solutions that also serve as the custodial or escrow bank in any case in which you have held a leadership position? Please describe your investigation and its results.

    Answer: No other than the exceptions set forth here. The Hagens Berman firm has a banking relationship with Huntington Bank. It is customary for law firms to have banking relationships to support their ongoing operations. In this case, both the law firm and the bank have assured the undersigned counsel that this is an ordinary and customary banking relationship involving the same terms that would be available to any other borrower and that no favorable discussion, terms, or conditions were offered to the law firm or received by the firm. I am also aware that Cohen Milstein has a banking relationship at Eagle Bank and other banks who served in unrelated litigation as an escrow agent for other cases in which Cohen Milstein was involved but has no involvement in this case. This is set forth in the Cohen Milstein Affidavit. In addition, as set forth above, there is a pre-existing relationship between our firm as one of our co-counsel's firm with Morgan Stanley and its local affiliate.

This investigation involved interviews and a review of past leadership cases, banking relationships, and firm accounts. Other than the above, there is nothing else to disclose.

11. Do you know of any other relationship or fact that you believe, if known, would be material to the Court concerning either an actual conflict of interest or the appearance of a conflict of interest that has not already been disclosed to the Court?

    Answer: No. After a comprehensive review, no additional material facts exist.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23rd Day of October 2025.

Michael Ketchmark
Ketchmark & McCreight, P.C.

Exhibit 2

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

JEREMY KEEL, *et al.*, on behalf of themselves and all others similarly situated, Plaintiffs, v. CHARLES RUTENBERG REALTY, INC., TIERRA ANTIGUA REALTY, LLC, WEST USA REALTY, INC., MY HOME GROUP REAL ESTATE, LLC., Defendants.	Case No. 4:25-cv-00759

DECLARATION OF ERIC DIRKS

I, Eric Dirks, state the following under penalty of perjury. I further state that I understand my continuing obligation to immediately supplement this affidavit if circumstances change in any way that modifies or changes any of these answers. I have reviewed all of the affidavits from co- counsel and have no issues with the matters raised.

1. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any company or entity that is financing the litigation for this matter? Please describe your investigation and its results.

Answer: No. I conducted a thorough investigation by reviewing my firm's financial records, consulting with all attorneys and employees, and inquiring with co-counsel. No such relationships were identified.

2. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank, private equity fund, hedge fund, settlement administrator, vendor, or similar institution (except for holdings in mutual funds that do not grant control over such entities) that has a role in this litigation? Please describe your investigation and its results.

Answer: No, concerning my firm and all co-counsel, with two immaterial exceptions. First, Hagens Berman Sobol Shapiro LLP ("Hagens Berman"), which has a pre-existing banking relationship with Huntington Bank. It is customary for law firms to have banking relationships to support their ongoing operations. Huntington Bank is a lender to Hagens Berman. As part of our investigation, I, along with Michael Ketchmark, interviewed a bank senior officer. I verified that the terms and conditions associated with the banking relationship with Hagens Berman were the same as with any other customers and that there were no favorable terms, conditions, discounts, or rebates offered to the firm. Second, I was advised that, in 2021, Huntington's parent company acquired TCF Financial Corporation, which owned Winthrop Resources Corporation. Susman Godfrey LLP ("Susman Godfrey") represented Winthrop in unrelated, pending litigation at the time of the transaction. I have further been advised that the terms of Susman Godfrey's representation of Winthrop did not change following the acquisition, and Susman Godfrey has not represented Winthrop since that matter closed approximately three years ago.

My investigation involved examining firm accounting documents, employee interviews, and co-counsel statements. Other than the above, no relevant relationships exist other than minor matters outlined in the various affidavits.

3. Have you, your firm, any firm partner or employee, or any co-counsel accepted anything of value from any bank, settlement administrator, or vendor who is or might provide services in this matter more than $250 (excluding the sponsorship of a large event or dinner)? Please describe your investigation and its results.

Answer: No concerning my firm. I conducted interviews and inquired about firm personnel and co-counsel. Nothing exceeding $250 was accepted other those identified in the Affidavit of Steve Berman.

4. Do you, your firm, or any co-counsel have any financing that is contingent upon the outcome of this litigation? Please describe your investigation and its results. If yes, the following questions shall be answered:

Answer: No. Investigation included review of my firm's financing agreements and discussions with co-counsel. No contingent financing was found. Subparts a-c are therefore not applicable.

5. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any litigation lending companies that would provide funds directly to potential claimants in this case? Please describe your investigation and its results.

Answer: No. I checked firm associations, partner investments, and co-counsel disclosures. No such relationships were discovered.

6. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect), including but not limited to as an investor, Officer, Director, employee, or contractor, with any party or client/claimant involved in this MDL or class action (other than a written retainer or engagement agreement for a client in this case)? Please describe your investigation and its results.

Answer: No. Investigation encompassed interviews with all firm lawyers and internal consultations. No additional relationships exist. It is possible that certain firm partners or employees or their relatives may have small non-controlling stock interests through their passive ownership of mutual funds or ETFs in defendants that are publicly traded corporations.

7. Do you, any firm partner or employee, or any co-counsel partner or employee have any personal relationship (including but not limited to familial, romantic, or financial/business) with any party, client, claimant, counsel, or vendor involved in this MDL or class action? Please describe your investigation and its results.

Answer: No. No personal relationships were identified. I interviewed all partners, attorneys and staff at my firm. As the court is aware, however, all co-counsel are also involved in the related litigation in front of this Court. All co-counsel various written agreements concerning compensation and the division of fees. No relevant relationships exist other than minor matters outlined in the various affidavits. In addition, there are more than 2 million claims that were submitted, and it is certainly possible that some of these claimants are friends, relatives, or business associates of one or more of the hundreds of employees of various lead counsel. However, all claimants are treated the same regardless of this fact.

8. Do you, your firm, any firm partner or employee, or any co-counsel represent any present parties or claimants in this litigation who you have represented in any other capacity or in any other court (either currently or within the past 3 years)? Please describe your investigation and its results.

Answer: No. I interviewed all firm personnel and reviewed our client databases. No prior representations overlap. As the court is aware, however, all co-counsel are also involved in the related litigation in front of this Court.

9. Do you, your firm, any firm partner or employee, or any co-counsel have any financial interest (direct or indirect) in any similar claims or lawsuits filed or registered by any other counsel in this MDL or class action? Please describe your investigation and its results.

Answer: No. I examined firm case files, investment records, and co-counsel interests. No financial interest in similar claims was found. As the court is aware, however, all co- counsel are also involved in the related litigation before this Court.

10. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank or financial institution for lending services or solutions that also serve as the custodial or escrow bank in any case in which you have held a leadership position? Please describe your investigation and its results.

Answer: No, with the exception regarding Hagens Berman. The Hagens Berman firm has a banking relationship with Huntington Bank. It is customary for law firms to have banking relationships to support their ongoing operations. In this case, both the law firm and the bank have assured the undersigned counsel that this is an ordinary and customary banking relationship involving the same terms that would be available to any other borrower and that no favorable discussion, terms, or conditions were offered to the law firm or received by the firm. I am also aware that Cohen Milstein has a banking relationship at Eagle Bank who has served in unrelated litigation as an escrow agent for other cases in which Cohen Milstein was involved but has no involvement in this case.

This investigation involved interviews and a review of past leadership cases, banking relationships, and firm accounts. Other than the above, there is nothing else to disclose.

We are currently in the process of moving the escrow funds in this litigation and related litigation to Morgan Stanley from Huntington Bank. No relationships with Morgan Stanley were found other than one firm associate maintains a brokerage account through the Ferguson Smith Cohen Group, which is a Morgan Stanley-affiliated advisor in the Kansas City area.

11. Do you know of any other relationship or fact that you believe, if known, would be material to the Court concerning either an actual conflict of interest or the appearance of a conflict of interest that has not already been disclosed to the Court?

Answer: No. After a comprehensive review, no additional material facts exist.

I verify under penalty of perjury that the foregoing is true and correct.

October 22, 2025

Eric L. Dirks
WILLIAMS DIRKS DAMERON LLC

Exhibit 3

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

JEREMY KEEL, et al., individually and on behalf of all others similarly situated, Plaintiffs, v. CHARLES RUTENBERG REALTY, INC., et al. Defendants.	)	Case No. 4:25-cv-00759-SRB

DECLARATION AND DISCLOSURE OF BRANDON BOULWARE

I, Brandon Boulware, state the following under penalty of perjury. I am answering on behalf of myself and my law firm (including partners, associates, and employees). I further state that I understand my continuing obligation to immediately supplement this Declaration if circumstances change in any way that modifies or changes any of these answers.

1. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any company or entity that is financing the litigation for this matter? Please describe your investigation and its results.

   Answer: No, as to my law firm (including myself, my partner, associates, and employees).

2. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank, private equity fund, hedge fund, settlement administrator, vendor, or similar institution (except for holdings in mutual funds that do not grant control over such entities) that has a role in this litigation? Please describe your investigation and its results.

   Answer: No, as to my law firm (including myself, my partner, associates, and employees).

3. Have you, your firm, any firm partner or employee, or any co-counsel accepted anything of value from any bank, settlement administrator, or vendor who is or might provide services in this matter more than $250 (excluding the sponsorship of a large event or dinner)? Please describe your investigation and its results.

   Answer: No, as to my law firm (including myself, my partner, associates, and employees).

4. Do you, your firm, or any co-counsel have any financing that is contingent upon the outcome of this litigation? Please describe your investigation and its results. If yes, the following questions shall be answered:

Answer: No, as to my law firm (including myself, my partner, associates, and employees).

5. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any litigation lending companies that would provide funds directly to potential claimants in this case? Please describe your investigation and its results.

   Answer: No, as to my law firm (including myself, my partner, associates, and employees).

6. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect), including but not limited to as an investor, Officer, Director, employee, or contractor, with any party or client/claimant involved in this MDL or class action (other than a written retainer or engagement agreement for a client in this case)? Please describe your investigation and its results.

   Answer: No, as to my law firm (including myself, my partner, associates, and employees).

7. Do you, any firm partner or employee, or any co-counsel partner or employee have any personal relationship (including but not limited to familial, romantic, or financial/business) with any party, client, claimant, counsel, or vendor involved in this MDL or class action? Please describe your investigation and its results.

   Answer: None of which I am aware, but because there are hundreds of thousands of claimants, it is possible that some of the claimants could be friends, relatives, or business associates with an employee at one of the co-counsel firms.

8. Do you, your firm, any firm partner or employee, or any co-counsel represent any present parties or claimants in this litigation who you have represented in any other capacity or in any other court (either currently or within the past 3 years)? Please describe your investigation and its results.

   Answer: No, as to my law firm (including myself, my partner, associates, and employees). As the Court is aware, however, all co-counsel are also involved in the related litigation (*Burnett, Gibson,* and *Keel I*) in front of this Court.

9. Do you, your firm, any firm partner or employee, or any co-counsel have any financial interest (direct or indirect) in any similar claims or lawsuits filed or registered by any other counsel in this MDL or class action? Please describe your investigation and its results.

   Answer: No, as to my law firm (including myself, my partner, associates, and employees), other than my firm's interest in the related litigation (*Burnett, Gibson,* and *Keel I*) before this Court.

10. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank or financial institution for lending services

or solutions that also serve as the custodial or escrow bank in any case in which you have held a leadership position? Please describe your investigation and its results.

Answer: No, as to my law firm (including myself, my partner, associates, and employees).

We are currently in the process of moving the escrow funds in this litigation and related litigation to Morgan Stanley from Huntington Bank. No relationships with Morgan Stanley were found other than certain co-counsel at other firms maintain a brokerage account through the Ferguson Smith Cohen Group, which is a Morgan Stanley-affiliated advisor in the Kansas City area.

11. Do you know of any other relationship or fact that you believe, if known, would be material to the Court concerning either an actual conflict of interest or the appearance of a conflict of interest that has not already been disclosed to the Court?

Answer: No, as to my law firm (including myself, my partner, associates, and employees).

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 22, 2025.

B. B.

Brandon J.B. Boulware

Exhibit 4

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

JEREMY KEEL, JEROD BREIT, HOLLEE ELLIS, FRANCES HARVEY, RHONDA BURNETT, DON GIBSON, LAUREN CRISS, JOHN MEINERS, DANIEL UMPA, CHRISTOPHER MOEHRL, MICHAEL COLE, STEVE DARNELL, JACK RAMEY, and JANE RUH, individually and on behalf of all others similarly situated,	)	
Plaintiffs,	)	
v.	)	Case No. 25-cv-00759-SRB
CHARLES RUTENBERG REALTY, INC., TIERRA ANTIGUA REALTY, LLC, WEST USA REALTY, INC., MY HOME GROUP REAL ESTATE, LLC,	)	
Defendants.	)	

AFFIDAVIT AND DISCLOSURE OF STEVE W. BERMAN

I, Steve W. Berman, Managing Partner of Hagens Berman Sobol Shapiro LLP, state the following under penalty of perjury. I further state that I understand my continuing obligation to immediately supplement this affidavit if circumstances change in any way that modifies or changes any of these answers.

1. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any company or entity that is financing the litigation for this matter? Please describe your investigation and its results.

   Answer: No. I conducted a thorough investigation by consulting with all partners, attorneys, and relevant employees at my firm, and inquiring with co-counsel. No such relationships were identified.

2. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank, private equity fund, hedge fund, settlement administrator, vendor, or similar institution (except for holdings in mutual funds that do not grant control over such entities) that has a role in this litigation? Please describe your investigation and its results.

   Answer: My firm, Hagens Berman Sobol Shapiro LLP ("Hagens Berman"), has a pre-existing banking relationship with Huntington Bank. It is customary for law firms to have banking relationships to support their ongoing operations. Huntington Bank is a lender to Hagens Berman. Specifically, we have a bank line of credit that we use for working capital purposes, as well as letters of credit that we use for the purpose of securing office real estate leases. As part of our investigation, we interviewed a bank senior officer and we verified that the terms and conditions associated with the banking relationship with Hagens Berman were the same as with any other customers and that there were no favorable terms, conditions, discounts, or rebates offered to the firm. My investigation involved consulting with firm partners and employees and co-counsel.

3. Have you, your firm, any firm partner or employee, or any co-counsel accepted anything of value from any bank, settlement administrator, or vendor who is or might provide services in this matter more than $250 (excluding the sponsorship of a large event or dinner)? Please describe your investigation and its results.

   Answer: We conducted a survey of all partners, attorneys and employees at the firm asking, have you "ever received anything of value worth more than $250 (excluding the sponsorship of a large event or dinner) from any of: (i) Huntington National Bank, (ii) JND, (iii) Veritext, or (iv) Litigen?" Veritext is a court reporting service used in the matter and Litigen is a litigation support service also used in this matter. The only positive response that came back was from one of our attorneys who accepted a ticket to a World Series baseball game in Boston in 2013. This attorney believes the ticket came from a court reporting vendor, which could have been Veritext, but the attorney is unsure of exactly who provided the ticket. The attorney is also unsure of the value of the ticket, but it possibly could have been worth more than $250. In addition, my firm also used Everlaw for eDiscovery and litigation support in this matter. Everlaw is a cloud-based eDiscovery and litigation platform used by legal teams to manage and streamline the process of discovery, investigation, and trial preparation. Based on a firm-wide inquiry, six partners collectively own a very small, non-controlling interest in the outstanding shares of Everlaw. Everlaw is a privately held company whose shares are not currently traded publicly. Everlaw is currently being used as a vendor for document management services in this matter. Everlaw was also previously used in the *Moehrl* and *Burnett* matters as a document vendor. Everlaw was selected after a careful review of the available document management systems. Attorneys on this matter compared the Everlaw pricing with that of other document management systems, and found that Everlaw's pricing was competitive. Over the course of Everlaw's work on the case, attorneys have continued to monitor Everlaw's rates. Attorneys have negotiated further discounts in Everlaw's pricing as the market price for document storage systems has decreased over time. Hagens Berman is prepared to provide any additional detail related to Everlaw that the Court requests.

4. Do you, your firm, or any co-counsel have any financing that is contingent upon the outcome of this litigation? Please describe your investigation and its results.

   Answer: No. Investigation included consulting with relevant firm partners and discussions with co-counsel. No contingent financing was found. Subparts a-c are therefore not applicable.

5. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any litigation lending companies that would provide funds directly to potential claimants in this case? Please describe your investigation and its results.

Answer: No. I consulted with relevant firm partners and consulted with co-counsel. No such relationships were identified.

6. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect), including but not limited to as an investor, Officer, Director, employee, or contractor, with any party or client/claimant involved in this MDL or class action (other than a written retainer or engagement agreement for a client in this case)? Please describe your investigation and its results.

   Answer: No. My firm conducted an investigation that included conflict checks, consulting with firm partners, attorneys, and employees, and consulting with co-counsel. No financial relationships were identified aside from the following. Thus far, claims have been submitted for more than two million transactions, and it is certainly possible that some of these claimants are friends, relatives, or business associates of one or more of the hundreds of employees of various lead counsel. However, all claimants are treated the same. It is also possible that certain firm partners or employees or their relatives may have small non-controlling stock interests either directly or through their ownership of mutual funds or ETFs in defendants that are publicly traded corporations.

7. Do you, any firm partner or employee, or any co-counsel partner or employee have any personal relationship (including but not limited to familial, romantic, or financial/business) with any party, client, claimant, counsel, or vendor involved in this MDL or class action? Please describe your investigation and its results.

   Answer: Not to my knowledge. We conducted personal inquiries and surveys of all firm partners, attorneys, and employees and no personal relationships were identified. As the Court is aware, however, all co-counsel are also involved in the related litigation in front of this Court. All co-counsel have various written agreements concerning compensation and the division of fees. In addition, there are more than 2 million claims that were submitted, and it is certainly possible that some of these claimants are friends, relatives, or business associates of one or more of the hundreds of employees of various lead counsel. However, all claimants are treated the same regardless of this fact.

8. Do you, your firm, any firm partner or employee, or any co-counsel represent any present parties or claimants in this litigation who you have represented in any other capacity or in any other court (either currently or within the past 3 years)? Please describe your investigation and its results.

   Answer: No. I examined case management and other firm records and consulted with relevant firm partners, attorneys, and employees, as well as co-counsel. No prior client representations overlap with the exception of named plaintiff Daniel Umpa, who is also serving as a named plaintiff in the related *Moehrl* suit pending in the Northern District of Illinois. In addition, claims have been submitted for more than two million transactions, and it is certainly possible that some of these claimants have been represented by my firm or co-counsel in other matters. However, all claimants are treated the same.

9. Do you, your firm, any firm partner or employee, or any co-counsel have any financial interest (direct or indirect) in any similar claims or lawsuits filed or registered by any other counsel in this MDL or class action? Please describe your investigation and its results.

Answer: I examined firm case files, consulted with relevant firm partners, attorneys, and employees, and consulted with co-counsel. As the court is aware, the co-lead firms in this case are involved in related litigation before this Court and in the Northern District of Missouri. In addition, as previously identified and reflected in the fee applications submitted in this suit for instance, the co-lead firms in this case have worked with several other firms with respect to certain additional companies sued in similar actions and the settlement of related claims. Aside from these claims and lawsuits, following an investigation, I have not identified any other responsive financial interests.

10. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank or financial institution for lending services or solutions that also serve as the custodial or escrow bank in any case in which you have held a leadership position? Please describe your investigation and its results.

Answer: No, with the limited exceptions described below. This investigation involved a review of past leadership cases, banking relationships, and firm accounts and consultations with firm partners, attorneys, and employees, as well as co-counsel. My firm, Hagens Berman, has a pre-existing banking relationship with Huntington Bank. Specifically, we have a bank line of credit that we use for working capital purposes, as well as letters of credit that we use for the purpose of securing office real estate leases.

We are currently in the process of moving escrow funds in this litigation and related litigation to Morgan Stanley from Huntington Bank. Certain attorneys at Hagens Berman have personal bank accounts and other related services with Morgan Stanely.

Cohen Milstein has a banking relationship with Eagle Bank, which is not an escrow agent in this case but has served as an escrow agent in certain other cases in which Cohen Milstein has held a leadership position. In addition, certain partners and employees of Hagens Berman and co-counsel have personal bank accounts, credit cards, mortgages, auto loans, and possibly stock in several banks (e.g., Citibank, JP Morgan Chase) that are not escrow agents in this case but have served as escrow agents in certain other cases in which Hagens Berman or co-counsel have held a leadership position.

11. Do you know of any other relationship or fact that you believe, if known, would be material to the Court concerning either an actual conflict of interest or the appearance of a conflict of interest that has not already been disclosed to the Court?

Answer: No. After a comprehensive review, I have not identified any additional material facts.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on this 22nd day of October 2025.

Steve W. Berman
HAGENS BERMAN SOBOL SHAPIRO LLP
1301 Second Avenue, Suite 2000
Seattle, Washington 98101
Telephone: (206) 623-7292

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Exhibit 5

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

KEEL, et al.,	)	
Plaintiffs,	)	
v.	)	Case No. 25-cv-00759-SRB
CHARLES RUTENBERG REALTY, INC., et al.,	)	
Defendants.	)	

AFFIDAVIT AND DISCLOSURE OF MARC M. SELTZER

I, Marc M. Seltzer, state the following under penalty of perjury. I further state that I understand my continuing obligation to immediately supplement this affidavit if circumstances come to my attention that in any way modify or change any of these answers.

1. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any company or entity that is financing the litigation for this matter? Please describe your investigation and its results.

   Answer: No. I conducted a thorough investigation by consulting with relevant attorneys and employees at my firm, and inquiring with co-counsel. The term "co-counsel" as used in this affidavit refers to plaintiffs' co-lead counsel in this litigation. No such relationships were identified. No company or entity is financing the litigation for Susman Godfrey, other than Susman Godfrey itself.

2. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank, private equity fund, hedge fund, settlement administrator, vendor, or similar institution (except for holdings in mutual funds that do not grant control over such entities) that has a role in this litigation? Please describe your investigation and its results.

   Answer: No, concerning my firm and all co-counsel, with two immaterial exceptions. First, Hagens Berman Sobol Shapiro LLP ("Hagens Berman") has a pre-existing banking relationship with Huntington Bank. It is customary for law firms to have banking relationships to support their ongoing operations. Huntington Bank is a lender to Hagens Berman. As part of our investigation, I was advised that my co-counsel Mike Ketchmark interviewed a senior bank officer at Huntington. I was advised that the Huntington Bank officer verified that the terms and conditions associated with the banking relationship with Hagens Berman were the same as with any other customers and that there were no favorable terms, conditions, discounts, or rebates offered to the firm. Mr. Ketchmark further advised that he verified these facts during a conversation with Hagens Berman.

Second, in 2021, Huntington's parent company acquired TCF Financial Corporation, which owned Winthrop Resources Corporation. Susman Godfrey LLP ("Susman Godfrey") represented Winthrop in unrelated, pending litigation at the time of the transaction. The terms of Susman Godfrey's representation of Winthrop did not change following the acquisition, and Susman Godfrey has not represented Winthrop since that matter closed approximately three years ago.

My investigation involved consulting with firm partners and employees, as well as consulting with co-counsel.

3. Have you, your firm, any firm partner or employee, or any co-counsel accepted anything of value from any bank, settlement administrator, or vendor who is or might provide services in this matter more than $250 (excluding the sponsorship of a large event or dinner)? Please describe your investigation and its results.

   Answer: No. I conducted an inquiry of firm partners and employees and co-counsel. Nothing of value exceeding $250 (excluding the sponsorship of a large event or dinner) was identified, with the exceptions identified in the Affidavit and Disclosure of Steve W. Berman.

4. Do you, your firm, or any co-counsel have any financing that is contingent upon the outcome of this litigation? Please describe your investigation and its results. If yes, the following questions shall be answered:

   Answer: No. My investigation included consulting with relevant firm partners and discussions with co-counsel. No contingent financing was identified. Subparts a-c are therefore not applicable.

5. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any litigation lending companies that would provide funds directly to potential claimants in this case? Please describe your investigation and its results.

   Answer: No. I consulted with relevant firm partners and conferred with co-counsel. No such relationships were identified.

6. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect), including but not limited to as an investor, Officer, Director, employee, or contractor, with any party or client/claimant involved in this MDL or class action (other than a written retainer or engagement agreement for a client in this case)? Please describe your investigation and its results.

   Answer: No. My firm conducted an investigation that included conflict checks, consulting with firm partners and employees, and consulting with co-counsel. No financial relationships were identified aside from the following. Thus far, claims have been submitted for more than two million transactions, and it is certainly possible that some of these claimants are friends, relatives, or business associates of one or more of the hundreds of employees of various lead counsel. However, all claimants are treated the same regardless of this fact. It is also possible that certain firm partners or employees or their relatives may have small non-controlling stock interests either directly or through their ownership of mutual funds or ETFs in defendants that are publicly traded corporations.

7. Do you, any firm partner or employee, or any co-counsel partner or employee have any personal relationship (including but not limited to familial, romantic, or financial/business) with any party, client, claimant, counsel, or vendor involved in this MDL or class action? Please describe your investigation and its results.

   Answer: Not to my knowledge. I conducted an inquiry of firm partners and employees and consulted with co-counsel. No personal relationships were identified. As the court is aware, however, all co-counsel are also involved in related litigation before this Court. Co-counsel have written agreements concerning compensation and the division of fees. In addition, claims have been submitted for more than two million transactions thus far, and it is certainly possible that some of these claimants are friends, relatives, or business associates of one or more of the hundreds of employees of various lead counsel. However, all claimants are treated the same regardless of this fact.

8. Do you, your firm, any firm partner or employee, or any co-counsel represent any present parties or claimants in this litigation who you have represented in any other capacity or in any other court (either currently or within the past 3 years)? Please describe your investigation and its results.

   Answer: I examined case management and other firm records and consulted with relevant firm partners and employees, as well as co-counsel. Susman Godfrey and its co-counsel have represented the named plaintiffs in this matter in one or more related cases pending in this Court and in the Northern District of Illinois. In addition, claims have been submitted for more than two million transactions, and it is certainly possible that some of these claimants have been represented my firm or co-counsel in other matters. However, all claimants are treated the same regardless of that fact.

9. Do you, your firm, any firm partner or employee, or any co-counsel have any financial interest (direct or indirect) in any similar claims or lawsuits filed or registered by any other counsel in this MDL or class action? Please describe your investigation and its results.

   Answer: I examined firm case files, consulted with relevant firm partners and employees, and consulted with co-counsel. As the court is aware, the co-lead firms in this case are involved in related litigation before this Court and in the Northern District of Illinois. In addition, as previously identified and reflected in the fee applications submitted in the *Keel* suit for instance, the co-lead firms in this case have worked with several other firms with respect to certain additional companies sued in similar actions and the settlement of claims against them. Aside from these claims and lawsuits, following an investigation, I have not identified any other responsive financial interests.

10. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank or financial institution for lending services or solutions that also serve as the custodial or escrow bank in any case in which you have held a leadership position? Please describe your investigation and its results.

    Answer: No, with the limited exceptions described below. I conducted an investigation that included reviewing cases in which the firm held leadership positions, banking relationships, and firm accounts and consulting with firm partners and employees, as well as co-counsel. As described above, Hagens Berman has a banking relationship with Huntington Bank and Huntington acquired a former Susman Godfrey client. In addition, Cohen Milstein has a banking relationship with Eagle Bank, which is not an escrow agent in this case but has served as an escrow agent in certain other cases in which Cohen Milstein has held a leadership position. Susman Godfrey has banking relationships with Chase, Citibank, and Wells Fargo, which are not escrow agents in this case but may have served as escrow agents in certain other cases in which Susman Godfrey or co-counsel held leadership positions. In addition, certain partners and employees of each of the co-counsel firms have personal bank accounts, credit cards, mortgages, and/or stock with or issued by several banks (e.g., Citibank, JP Morgan Chase) that are not escrow agents in this case but have served as escrow agents in certain other cases in which Cohen Milstein or co-counsel have held a leadership position.

We are currently in the process of moving escrow funds in this litigation and related litigation to Morgan Stanley from Huntington Bank. Certain attorneys at Susman Godfrey and co-counsel firms have personal bank accounts and other related personal banking or brokerage services with Morgan Stanley or its affiliates.

11. Do you know of any other relationship or fact that you believe, if known, would be material to the Court concerning either an actual conflict of interest or the appearance of a conflict of interest that has not already been disclosed to the Court?

Answer: No. After a comprehensive review, I have not identified any additional material facts.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: October 23, 2025

Marc Seltzer

Marc M. Seltzer
SUSMAN GODFREY LLP
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Attorney for Plaintiffs

Exhibit 6

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

JEREMY KEEL, *et al.*, on behalf of themselves and all others similarly situated, Plaintiffs, v. CHARLES RUTENBERG REALTY, INC., TIERRA ANTIGUA REALTY, LLC, WEST USA REALTY, INC., MY HOME GROUP REAL ESTATE, LLC., Defendants.	Case No. 4:25-cv-00759

DECLARATION OF ROBERT A. BRAUN

I, Robert A. Braun, state the following under penalty of perjury. I further state that I understand my continuing obligation to immediately supplement this declaration if circumstances change in any way that modifies or changes any of these answers.

1. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any company or entity that is financing the litigation for this matter? Please describe your investigation and its results.

   Answer: No. I conducted a thorough investigation by consulting with relevant attorneys and employees at my firm and inquiring with co-counsel. No such relationships were identified.

2. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank, private equity fund, hedge fund, settlement administrator, vendor, or similar institution (except for holdings in mutual funds that do not grant control over such entities) that has a role in this litigation? Please describe your investigation and its results.

   Answer: No, concerning my firm and co-counsel, with three immaterial exceptions. First, Hagens Berman Sobol Shapiro LLP ("Hagens Berman") advised that it has a pre-existing banking relationship with Huntington Bank. It is customary for law firms to have banking relationships to support their ongoing operations. Huntington Bank is a lender to Hagens Berman. As part of our investigation, I was advised that my co-counsel Mike Ketchmark interviewed a senior bank officer at Huntington. I was further advised that the Huntington Bank officer verified that the terms and conditions associated with the banking relationship with Hagens Berman were the same as with any other customers and that there were no favorable terms, conditions, discounts, or rebates offered to the firm. Mr. Ketchmark also advised that he verified these facts during a conversation with Hagens Berman.

Second, I was advised that, in 2021, Huntington's parent company acquired TCF Financial Corporation, which owned Winthrop Resources Corporation. Susman Godfrey LLP ("Susman Godfrey") represented Winthrop in unrelated, pending litigation at the time of the transaction. I have further been advised that the terms of Susman Godfrey's representation of Winthrop did not change following the acquisition, and Susman Godfrey has not represented Winthrop since that matter closed approximately three years ago.

In addition, class counsel is currently in the process of moving the escrow funds in this litigation and related litigation to Morgan Stanley from Huntington Bank. Certain partners and employees of Cohen Milstein and its co-counsel have personal bank accounts, investment accounts, credit cards and/or stock with Morgan Stanley. A junior associate at Cohen Milstein who does not work on this case previously interned and received a partial college tuition scholarship nearly a decade ago. The non-attorney spouse of an of counsel Cohen Milstein attorney who does not work on this case previously received an event sponsorship from Morgan Stanley. The non-attorney spouse of an associate at Cohen Milstein who does not work on this case is employed by a company that Morgan Stanley is acquiring.

My investigation involved consulting with firm partners and employees, as well as with co-counsel.

3. Have you, your firm, any firm partner or employee, or any co-counsel accepted anything of value from any bank, settlement administrator, or vendor who is or might provide services in this matter more than $250 (excluding the sponsorship of a large event or dinner)? Please describe your investigation and its results.

   Answer: I conducted an inquiry of firm partners and employees and co-counsel. A discovery counsel at Cohen Milstein who does not work on this matter was an invited speaker at an Everlaw-hosted discovery conference for which her airfare and registration costs were compensated. Certain partners and employees of Cohen Milstein and its co-counsel have personal bank accounts, investment accounts, credit cards and/or stock with Morgan Stanley and may have received benefits in connection with those personal accounts valued at more than $250. Nothing else of value exceeding $250 (excluding the sponsorship of a large event or dinner) was identified.

4. Do you, your firm, or any co-counsel have any financing that is contingent upon the outcome of this litigation? Please describe your investigation and its results. If yes, the following questions shall be answered:

   Answer: No. My investigation included consulting with relevant firm partners and discussions with co-counsel. No contingent financing was identified. Subparts a-c are therefore not applicable.

5. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any litigation lending companies that would provide funds directly to potential claimants in this case? Please describe your investigation and its results.

   Answer: No. I consulted with relevant firm partners and conferred with co-counsel. No such relationships were identified.

6. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect), including but not limited to as an investor, Officer, Director, employee, or contractor, with any party or client/claimant involved in this MDL or class action (other than a written retainer or engagement agreement for a client in this case)? Please describe your investigation and its results.

   Answer: No. My firm conducted an investigation that included conflict checks, consulting with firm partners and employees, and consulting with co-counsel. No financial relationships were identified aside from the following. Thus far, claims have been submitted for more than two million transactions, and it is possible that some of these claimants are friends, relatives, or business associates of one or more of the hundreds of employees of various lead counsel. However, all claimants are treated the same. It is also possible that certain firm partners or employees or their relatives may have small non-controlling stock interests either directly or through their ownership of mutual funds or ETFs in defendants that are publicly traded corporations.

7. Do you, any firm partner or employee, or any co-counsel partner or employee have any personal relationship (including but not limited to familial, romantic, or financial/business) with any party, client, claimant, counsel, or vendor involved in this MDL or class action? Please describe your investigation and its results.

   Answer: Not to my knowledge. I conducted an inquiry of firm partners and employees and consulted with co-counsel. No personal relationships were identified. As the court is aware, however, all co-counsel are also involved in related litigation before this Court. Co-counsel have written agreements concerning compensation and the division of fees. In addition, claims have been submitted for more than two million transactions thus far, and it is possible that some of these claimants are friends, relatives, or business associates of one or more of the hundreds of employees of various lead counsel. However, all claimants are treated the same. However, all claimants are treated the same regardless of this fact.

8. Do you, your firm, any firm partner or employee, or any co-counsel represent any present parties or claimants in this litigation who you have represented in any other capacity or in any other court (either currently or within the past 3 years)? Please describe your investigation and its results.

   Answer: I examined case management and other firm records and consulted with relevant firm partners and employees, as well as co-counsel. Cohen Milstein and its co-counsel have represented the named plaintiffs in this matter in one or more related cases pending in this Court and in the Northern District of Illinois. In addition, claims have been submitted for more than two million transactions, and it is possible that some of these claimants have been represented my firm or co-counsel in other matters. However, all claimants are treated the same.

9. Do you, your firm, any firm partner or employee, or any co-counsel have any financial interest (direct or indirect) in any similar claims or lawsuits filed or registered by any other counsel in this MDL or class action? Please describe your investigation and its results.

   Answer: I examined firm case files, consulted with relevant firm partners and employees, and consulted with co-counsel. As the court is aware, the co-lead firms in this case are involved in related litigation before this Court and in the Northern District of Illinois. In addition, as previously identified and reflected in the fee applications submitted in the *Keel* suit for instance, the co-lead firms in this case have worked with several other firms with respect to certain additional companies sued in similar actions and the settlement of claims against them. Aside from these claims and lawsuits, following an investigation, I have not identified any other responsive financial interests.

10. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank or financial institution for lending services or solutions that also serve as the custodial or escrow bank in any case in which you have held a leadership position? Please describe your investigation and its results.

    Answer: No, with the limited exceptions described below. I conducted an investigation that included reviewing cases in which the firm held leadership positions, banking relationships, and firm accounts and consulting with firm partners and employees, as well as co-counsel. As described above, Hagens Berman has a banking relationship with Huntington Bank, and Huntington acquired a former Susman Godfrey client. Cohen Milstein also has a banking relationship with Eagle Bank, which is not an escrow agent in this case but has served as an escrow agent in certain other cases in which Cohen Milstein has held a leadership position. In addition, certain partners and employees of Cohen Milstein and its co-counsel have personal bank accounts, credit cards, mortgages, and/or stock in several banks (e.g., Citibank, JP Morgan Chase) that are not escrow agents in this case but have served as escrow agents in certain other cases in which Cohen Milstein or co-counsel have held a leadership position.

    In addition, class counsel is currently in the process of moving the escrow funds in this litigation and related litigation to Morgan Stanley from Huntington Bank. Certain partners and employees of Cohen Milstein and its co-counsel have personal bank accounts, investment accounts, credit cards and/or stock with Morgan Stanley. A junior associate at Cohen Milstein who does not work on this case previously interned and received a partial college tuition scholarship nearly a decade ago. The non-attorney spouse of an of counsel Cohen Milstein attorney who does not work on this case previously received an event sponsorship from Morgan Stanley. The non-attorney spouse of an associate at Cohen Milstein who does not work on this case is employed by a company that Morgan Stanley is acquiring.

11. Do you know of any other relationship or fact that you believe, if known, would be material to the Court concerning either an actual conflict of interest or the appearance of a conflict of interest that has not already been disclosed to the Court?

    Answer: No. After a comprehensive review, I have not identified any additional material facts.

    I verify under penalty of perjury that the foregoing is true and correct.

October 23, 2025

Robert A. Braun
COHEN MILSTEIN SELLERS & TOLL, PLLC