Andre M. Mura (SBN 298541)
Ezekiel S. Wald (SBN 341490)
GIBBS MURA LLP
1111 Broadway, Suite 2100
Oakland, CA 94607
Telephone: (510) 350-9700
Facsimile: (510) 350-9701
amm@classlawgroup.com
zsw@classlawgroup.com

Geoffrey A. Graber (SBN 211547)
Karina G. Puttieva (SBN 317702)
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Ave. NW, Suite 800
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699
ggraber@cohenmilstein.com
kputtieva@cohenmilstein.com

Attorneys for Plaintiffs and the Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CAT BROOKS and RASHEED SHABAZZ, individually and on behalf of all others similarly situated,

Plaintiff,

v.

THOMSON REUTERS CORPORATION,

Defendants.

Case No. 3:21-cv-01418-EMC-KAW

DECLARATION OF JONATHAN P. SHAFFER RE: DISTRIBUTION STATUS

I, Jonathan P. Shaffer, declare and state as follows:

1. I am an Associate Project Director with Angeion Group ("Angeion"), located at 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. I am over 21 years of age and am not a party to this action and I have personal knowledge of the facts set forth herein.

2. On April 15, 2025, Angeion sent distribution payments to the claimants who submitted valid claims. The initial deadline for Settlement Class Members to cash their Individual Class Payment check was May 7, 2025.

3. As of February 24, 2026, A total of 116,542 electronic payments were attempted. Of these, 114,539 payments were successful totaling $17,878,392.51 and 2,003 payments were ultimately unsuccessful totaling $312,648.27. Electronic payments that were deemed ultimately unsuccessful were mailed a check.

4. As of February 24, 2026, Angeion distributed 10,713 Checks. Of these, 9,899 checks were cashed, totaling $1,545,134.91 and 814 checks remained uncashed totaling $127,057.26.

5. As of February 24, 2026, the total remaining in the Settlement Fund is $122,101.51.

6. The reason the uncashed checks balance reflected in paragraph 4 exceeds the total remaining in the settlement fund reflected in paragraph 5 is because as the distribution proceeded (following the initial calculation of the distribution amount), a small number of claimants who were initially marked as fraudulent communicated with Angeion and ultimately demonstrated their legitimacy. Angeion paid these claimants accordingly, in conjunction with receiving interest payments on the fund, according to the claimants' preferred payment method (i.e., not all of them were paid via checks). Because of those additional payments, there is a minor difference between the total uncashed funds and amount remaining in the Settlement Fund.

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

Executed on March 3, 2026.



JONATHAN P. SHAFFER