UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY LITIGATION

Master Docket No.: 4:20-cv-03056-DMR

NOTICE COMPLIANCE DECLARATION OF STEVEN WEISBROT ON BEHALF OF ANGEION GROUP, LLC

I, Steven Weisbrot, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am the President and Chief Executive Officer at the class action notice and claims administration firm Angeion Group, LLC ("Angeion"). My credentials were previously provided in my Declaration that was submitted to the Court on August 6, 2021 (ECF No. 139).

2. The purpose of this Declaration is to provide the Court with a summary of the work performed by Angeion thus far to effectuate notice pursuant to the Court's November 19, 2021 Order on Motion for Preliminary Approval of a Class Action Settlement ("Order").

3. Angeion was retained to serve as the Settlement Administrator to, among other tasks, implement the Notice Program; receive and process Claim Forms and respond to Class Member inquiries; establish and maintain a dedicated Settlement Website and toll-free telephone number; and perform other duties as specified in the Class Action Settlement Agreement ("Agreement") that this Court preliminarily approved on November 19, 2021 (ECF No. 153).

SUMMARY OF THE NOTICE PROGRAM

4. The Notice Program approved by the Court provides individual direct notice to all reasonably identifiable Class Members via email or mail, combined with a strategic media campaign comprised of state-of-the-art digital advertising, social media advertising, search engine

marketing, sponsored listings on two leading class action settlement websites, and engagement on social media. The Notice Program also includes the implementation of a dedicated website and a toll-free telephone line where Class Members can learn more about their rights and options pursuant to the terms of the Settlement.

DISTRIBUTION OF CAFA NOTICE

5. On August 13, 2021, pursuant to 28 U.S.C. §§ 1715(b), Angeion caused Notice regarding the Settlement to be sent to the Attorneys General of all states and territories and the Attorney General of the United States ("CAFA Notice"). The CAFA Notice mailings included copies of the documents listed in the CAFA Notice. A true and correct copy of the CAFA Notice is attached hereto as Exhibit A

DIRECT NOTICE

Email Notice

6. On or about November 29, 2021, as ordered by the Court, Plaid provided Angeion with electronic files containing 62,028,348 records of class member email addresses and 654,304 records of Class member Mailing addresses. After removing duplicative records, Angeion identified a total of 62,008,166 unique records with valid email addresses and a total of 651,153 unique records with mailing addresses.

7. Between January 7, 2022 and January 28, 2022, Angeion caused the email notice to be sent to the 60,271,546 Settlement Class Members with valid email addresses. The full deliverability of the emailed notices is not known as of the date of this declaration. Angeion can report as of January 25, 2022, approximately 647,109 notices could not be delivered, which only constitutes the information available at this time. Future declarations concerning the implementation of the notice program will include the total undeliverable email number. A true and accurate copy of the email notice is attached hereto as Exhibit B.

Custom Social Media Notice

8. On January 28, 2022, Angeion caused the custom social media campaign to commence to Class Members for which an email address was provided by Plaid, as ordered by the Court, and where those email addresses are used as the primary log-in for Facebook or Instagram, display

ads are delivered directly to Class Members via those social media platforms. A true and accurate copy of the advertisements is attached hereto as Exhibit C.

Mailed Notice

9. Between January 21, 2022 and January 24, 2022, Angeion caused the postcard notice to be mailed to the 650,669 Class Member records that did not have email addresses, but had mailing address information. A true and accurate copy of the postcard notice is attached hereto as Exhibit D.

10. Prior to mailing, Angeion caused the mailing list to be updated utilizing the United States Postal Service's ("USPS") National Change of Address database, which provides updated address information for individuals or entities that have moved during the previous four years and filed a change of address with the USPS. Angeion will receive and process mailed notices returned by the USPS as undeliverable. Notices returned to Angeion by the USPS with a forwarding address will be re-mailed to the new address provided by the USPS. Notices returned to Angeion by the USPS without a forwarding address will be subjected to address verification searches ("skip traces"), and notices will be re-mailed to any updated addresses identified through the skip trace process.

MEDIA NOTICE

Digital and Social Media Notice

11. On or about January 13, 2022, Angeion implemented the programmatic digital banner ad campaign designed to reach the Target Audience and drive them to the Settlement Website. True and correct copies of the banner ads are attached hereto as Exhibit E.

12. On or about January 24, 2022, Angeion implemented a social media campaign utilizing the platforms Facebook and Instagram to notify and drive Settlement Class Members to the dedicated Settlement Website where they could find more information about the Settlement and submit a claim form. True and correct copies of the social media ads are attached hereto as Exhibit F.

13. On or about January 25, 2022, Angeion also implemented a social media campaign with video incorporated utilizing the platforms Facebook and Instagram. A true and correct copy of a

depiction image of the social media adverting with a video component is attached hereto as Exhibit G.

14. The media notice is scheduled to run for 45 days and is designed to deliver approximately 326 million impressions, with an approximate 80.40% reach and an average frequency of 3.62. Angeion will provide the parties and the Court with an update after the media campaign has concluded.

Paid Search Campaign

15. On or about January 25, 2022, Angeion implemented a paid search campaign to help drive Settlement Class Members who are actively searching for information about the Settlement to the dedicated Settlement Website.

Sponsored Class Action Website Listings

16. On January 11, 2022, sponsored listings on Top Class Actions and ClassAction.org were implemented. True and correct copies of the listings are attached hereto as Exhibits H and I, respectively.

Social Media Engagement

17. Beginning on January 26, 2022, Angeion began monitoring public Twitter traffic for discussion of the Settlement, including historical discussions that preceded the monitoring date, in order to provide information or respond to questions via Twitter.

SETTLEMENT WEBSITE AND TOLL-FREE HOTLINE

18. On or about January 6, 2022, Angeion established the following website devoted to this Settlement: www.PlaidSettlement.com ("Settlement Website"). The Settlement Website contains general information about the Settlement, including answers to frequently asked questions, important dates and deadlines pertinent to this matter, and copies of important documents. Visitors to the Settlement Website can download (1) a Long Form Notice, (2) a Claim Form, (3) the Consolidated Amended Class Action Complaint, (4) the Order, and (5) the Agreement. The Settlement Website also has a "Contact Us" page whereby Class Members can submit questions regarding the Settlement to a dedicated email address: Questions@PlaidSettlement.com. The

Settlement Website address was set forth in the Long Form Notice and Claim Form. A true and correct copy of the Long Form Notice is attached hereto as Exhibit J.

19. On or about January 6, 2022, Angeion established an online claim filing portal (on the Submit a Claim page of the Settlement Website) whereby Class Members can complete and submit their Claim Form via the Settlement Website, or where they can download a PDF of the Claim Form to complete and submit by mail.

20. On or about January 20, 2022, Angeion implemented a customized video on the Submit a Claim page of the Settlement Website to provide instructions for Class Members on how to file a claim. A true and correct copy of a depiction image of this video is attached hereto as Exhibit K.

21. As of January 27, 2022, the Settlement Website has had 4,140,671 page views and 1,971,061 sessions, which represents the number of individual sessions initiated by all users.

22. On or about January 4, 2022, Angeion established the following toll-free line dedicated to this case: 1-855-645-1115. The toll-free line utilizes an interactive voice response ("IVR") system to provide Class Members with responses to frequently asked questions, the ability to request a Claim Form, and includes information about filing a claim and important dates and deadlines. The toll-free line is accessible 24 hours a day, 7 days a week.

23. As of January 27, 2022, the toll-free number has received approximately 8,770 calls, totaling 37,197 minutes.

CLAIM FORM SUBMISSIONS

24. The deadline for members of the Settlement Class to submit a claim form is April 28, 2022. As of January 27, 2022, Angeion has received approximately 679,037 claim form submissions. These claim form submissions are still subject to final audits, including the full assessment of each claim's validity and a review for duplicate submissions. Angeion will continue to keep the parties apprised of the number of claim form submissions received.

REQUESTS FOR EXCLUSION AND OBJECTIONS TO THE SETTLEMENT

25. The deadline for members of the Settlement Class to request exclusion from the Settlement or object to the Settlement is March 4, 2022. As of January 27, 2022, Angeion has not

received any requests for exclusion from the Settlement. Angeion will inform the parties of any requests for exclusion it receives.

26. Angeion has been made aware of two objections to the Settlement, which were filed with the Court as reflected on the docket (ECF Nos. 154, 155). The filed objections are attached hereto as Exhibits L and M. Angeion has reached out to the Class Member who submitted the second objection (ECF No. 155), to assist him in addressing the technical issues identified in his letter.

CONCLUSION

27. The Notice Program described herein included direct notice to all reasonably identifiable members of the Settlement Class via email or mail where an email address was not provided, coupled with a robust digital campaign that included, programmatic display advertising, social media advertising, video advertising and the implementation of a dedicated Settlement Website and toll-free hotline to further inform members of the Settlement Class of their rights and options pursuant to the terms of the Settlement.

28. It is my professional opinion that the Notice Program provided full and proper notice to members of the Settlement Class before the claims, opt-out, and objection deadlines. Moreover, it is my opinion that the Notice Program was the best notice that is practicable under the circumstances and fully comported with due process and Federal Rule of Civil Procedure 23.

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

Dated: January 28, 2022

STEVEN WEISBROT

Exhibit A

ANGEION GROUP
Changing the Rules

1650 Arch Street, Suite 2210
Philadelphia, PA 19103
www.angeiongroup.com
215.563.4116 (P)
215.525.0209 (F)

August 13, 2021

VIA USPS PRIORITY MAIL

United States Attorney General &
Appropriate Officials

Re: Notice of Class Action Settlement
In re Plaid Inc. Privacy Litigation

Dear Counsel or Official:

Angeion Group, an independent claims administrator, on behalf of the defendant in the below-described action, hereby provides your office with this notice under the provisions of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, to advise you of the following proposed class action settlement:

Case Name: *In re Plaid Inc. Privacy Litigation*
Index Number: 4:20-cv-03056
Jurisdiction: United States District Court, Northern District of California Oakland Division
Date Settlement Filed with Court: August 5, 2021

In accordance with the requirements of 28 U.S.C. § 1715, please find copies of the following documents associated with this action on the enclosed CD-ROM:

1. **28 U.S.C. § 1715(b)(1)-Complaint:** *Complaint for Damages and Declaratory and Equitable Relief* filed with the Court on May 4, 2020; *Consolidated Amended Class Action Complaint for Damages and Declaratory and Equitable Relief* filed with the Court on August 5, 2020.

2. **28 U.S.C. § 1715(b)(2)-Notice of Any Scheduled Judicial Hearings:** A videoconference regarding Plaintiffs' motion for preliminary approval is currently scheduled for September 30, 2021. There are no other judicial hearings currently scheduled.

3. **28 U.S.C. § 1715(b)(3)-Notification to Class Members:** The Long Form Notice, Email Notice, Postcard Notice and Claim Forms filed with the Court on August 5, 2021.

4. **28 U.S.C. § 1715(b)(4)-Class Action Settlement Agreement:** *Class Action Settlement Agreement* filed with the Court on August 5, 2021. *Notice of Motion and Motion for Preliminary Approval of Class Action Settlement, Declaration of Shawn M. Kennedy in Support of Plaintiffs' Motion for Preliminary Approval, as well as the Declaration of The Honorable Jay C. Gandhi (Ret.)* filed with the Court on August 5, 2021, are also included on the enclosed CD-ROM.

5. **28 U.S.C. § 1715(b)(5)-Any Settlement or Other Agreements:** Other than the *Class Action Settlement Agreement*, no other settlements or other agreements have been contemporaneously made between the Parties.

6. **28 U.S.C. § 1715(b)(6)-Final Judgment:** The Court has not issued a Final Judgment or notice of dismissal as of the date of this CAFA Notice.

7. **28 U.S.C. § 1715(b)(7)(B)-Estimate of Class Members:** The Settlement Class is estimated to potentially include approximately ninety-eight million Class Members located throughout the United States. The estimated proportional share of the Settlement benefits is not available at this time, as it is contingent on the Class Member submission of a claim form.

8. **28 U.S.C. §1715(b)(8)-Judicial Opinions Related to the Settlement:** The Court has not issued a judicial opinion related to the Settlement at this time. The *[Proposed] Order Granting Preliminary Approval of Settlement* is included on the enclosed CD-ROM.

If you have questions or concerns about this notice, the proposed settlement, or the enclosed materials, or if you did not receive any of the above-listed materials, please contact this office.

Sincerely,

Angeion Group
1650 Arch Street, Suite 2210
Philadelphia, PA 19103
(p) 215-563-4116
(f) 215-563-8839

Enclosures

Exhibit B

Sender Email: DoNotReply@PlaidSettlement.com

Sender Name: Settlement Administrator

Subject Line: Notice of Class Action Settlement – In re Plaid Inc. Privacy Litigation

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Notice ID: [Notice ID number]
Confirmation Code: [Confirmation code number]

Notice of Class Action Settlement - In re Plaid Inc. Privacy Litigation

If you connected your financial account(s) to a mobile or web-based app that has used Plaid between January 1, 2013 and November 19, 2021 in the United States, you may be eligible for a payment from a class action Settlement.

This is a Court-approved Legal Notice. This is not an advertisement.

A Settlement has been proposed in class action litigation against Plaid Inc. ("Plaid"). Plaid enables connections between a user's financial account(s) and approximately 5,000 mobile and web-based applications ("apps"). This class action alleges Plaid took certain improper actions in connection with this process. The allegations include that Plaid: (1) obtained more financial data than was needed by a user's app, and (2) obtained log-in credentials (username and password) through its interface, known as Plaid Link, which the litigation alleges had the look and feel of the user's own bank account login screen, when users were actually providing their login credentials directly to Plaid. Plaid denies these allegations and any wrongdoing and maintains that it adequately disclosed and maintained transparency about its practices to consumers.

Who is Included? You are a Class Member, and you are affected by this Settlement, if you own or owned one or more "Financial Accounts" between January 1, 2013 and November 19, 2021, and you were a United States resident at the time. A "Financial Account" is any checking, savings, loan, or other account at a financial institution (1) that Plaid accessed using the user's login credentials and connected to a mobile or web-based fintech application that enables payments (including ACH payments) or other money transfers or (2) for which a user provided financial account login credentials to Plaid through Plaid Link.

What does the Settlement provide? Under the Settlement, Plaid will pay $58 million to establish a Settlement Fund.

After deducting any court-approved attorneys' fees and expenses and Service Awards for the Class Representatives, and the costs of the Settlement administration, the Settlement Fund will be distributed to Class Members who submit valid claims, on a pro rata basis. The amount of the payments to individual Class Members will depend on the number of valid claims that are filed.

The Settlement also requires Plaid to:

- Delete certain data from Plaid systems;

- Inform Class Members of their ability to use Plaid Portal to manage the connections made between their financial accounts and chosen applications using Plaid and delete data stored in Plaid's systems;
- Continue to include certain disclosures and features in Plaid's standard Link flow;
- Enhance disclosures about Plaid's data collection practices, how Plaid uses data, and privacy controls Plaid has made available to uses in Plaid's End User Privacy Policy;
- Minimize the data that Plaid stores; and
- Continue to host a dedicated webpage with detailed information about Plaid's security practices.

How do I get a payment? You must submit a valid Claim Form online or postmarked by **April 28, 2022**. Claim Forms may be submitted online at www.PlaidSettlement.com or printed from the website and mailed to the address on the Claim Form. Claim Forms are also available by calling 855-645-1115 or emailing Questions@PlaidSettlement.com.

Do I have a lawyer in the case? If you are a Class Member, you have a lawyer in this case. The Court appointed as "Class Counsel" the law firms Burns Charest LLP; Herrera Kennedy LLP; and Lieff Cabraser Heimann & Bernstein LLP to represent the Class Members. If you want to be represented by your own lawyer, you may hire one at your own expense.

Your other options. If you are included in the Settlement and do nothing, your rights will be affected and you won't get a payment. If you don't want to be legally bound by the Settlement, you must exclude yourself from it by **March 4, 2022**. Unless you exclude yourself, you won't be able to sue or continue to sue Plaid for any claim made in this lawsuit or released by the Settlement Agreement. If you stay in the Settlement (i.e., don't exclude yourself), you may object to it or ask for permission for you or your lawyer to appear and speak at the Final Approval Hearing – at your own cost – but you don't have to. Objections and requests to appear are due by **March 4, 2022**. More information about these options is available at www.PlaidSettlement.com.

The Court's hearing. The Court will hold the Final Approval Hearing at **1 p.m. on May 12, 2022** in Courtroom 4 (3rd Floor) of the United States Courthouse, 1301 Clay Street, Oakland, CA 94612. At the Final Approval Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court may listen to people who appear at the hearing and who have provided notice of their intent to appear at the hearing. The Court may also consider Class Counsel's application for attorneys' fees, expenses and for Service Awards. At or after the hearing, the Court will decide whether to approve the Settlement and to approve Class Counsel's application for attorneys' fees, expenses and Service Awards.

This notice is only a summary.

For more information visit www.PlaidSettlement.com or call 855-645-1115.

Exhibit C

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Have you used a payments app? Did you enter your bank login information? If so, you may be eligible for a settlement payment.

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Did you enter your bank login information to connect your financial account(s) to a fintech app? You may be eligible for a payment.
4G 12:00 am
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Customer ID
Password
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Check if you are a Class Member
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Exhibit D

Notice of Class Action Settlement
In re Plaid Inc. Privacy Litigation

If you connected your financial account(s) to a mobile or web-based app that has used Plaid between January 1, 2013 and November 19, 2021 in the United States, you may be eligible for a payment from a class action Settlement.

This is a Court-approved Legal Notice.
This is not an advertisement.

This notice is only a summary. It contains information about a class action Settlement. More detailed information can be found at:

www.PlaidSettlement.com
Questions? 855-645-1115

Plaid Privacy Litigation
c/o Settlement Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103

PRESORTED
FIRST CLASS MAIL
US POSTAGE PAID
MAG

Electronic Service Requested

NUMBERIC EQUIVALENT

Postal Service: Please Do Not Mark Barcode

Notice ID: ‹‹Notice ID››
Confirmation Code: ‹‹Confirmation Code››

‹‹First Name›› ‹‹Last Name››
‹‹Address1››
‹‹Address2››
‹‹City››, ‹‹St›› ‹‹Zip››
‹‹Country››

A Settlement has been proposed in this class action litigation against Plaid Inc. ("Plaid"). Plaid enables connections between a user's financial account and approximately 5,000 mobile and web-based applications ("apps"). This class action alleges Plaid took certain improper actions by (1) obtaining log-in credentials to user's financial accounts through an interface ("Plaid Link") that allegedly had the look and feel of a bank account login screen, when in fact it was Plaid itself; and (2) obtaining more financial and other data than was authorized or needed by a user's app. Plaid denies these allegations and any wrongdoing and maintains that it adequately disclosed and maintained transparency about its practices.

Who is Included? You may be a Class Member, and affected by this Settlement, if you are a United States resident who connected one or more financial accounts to an app between January 1, 2013 and November 19, 2021. More specifically, you are a Class Member if you own or owned one or more "Financial Accounts" between January 1, 2013 and November 19, 2021. "Financial Accounts" is any checking, savings, loan, or other account at a financial institution (1) that Plaid accessed using the user's login credentials and connected to a mobile or web-based fintech application that enables payments (including ACH payments) or other money transfers or (2) for which a user provided financial account login credentials to Plaid through Plaid Link. You are receiving this notice because records indicate you may be a Class Member. For additional information on how to confirm whether you are a Class Member, please visit www.PlaidSettlement.com.

What does the Settlement provide? Under the Settlement, Plaid will pay $58 million to establish a Settlement Fund. After deducting any court-approved attorneys' fees and expenses, Service Awards for the Class Representatives, and the costs of the Settlement administration, the Settlement Fund will be distributed to Class Members who submit valid claims, on a pro rata basis. The amount of the payments to individual Class Members will depend on the number of valid claims that are filed. The Settlement also requires Plaid to provide other nonmonetary benefits. Please visit www.PlaidSettlement.com for more information.

How do I get a payment? You must submit a valid Claim Form submitted online or postmarked by **April 28, 2022**. Claim Forms may be submitted online at www.PlaidSettlement.com or by completing and returning a Claim Form to the Settlement Administrator. Please visit www.PlaidSettlement.com for more information.

Do I have a lawyer in the case? If you are a Class Member, you have a lawyer in this case. The Court appointed as "Class Counsel" the law firms Burns Charest LLP; Herrera Kennedy LLP; and Lieff Cabraser Heimann & Bernstein LLP to represent the Class Members. Their contact information is available at www.PlaidSettlement.com. If you want to be represented by your own lawyer, you may hire one at your own expense.

Your other options. If you are included in the Settlement and do nothing, your rights will be affected and you won't get a payment. If you don't want to be legally bound by the Settlement, you must exclude yourself from it by **March 4, 2022**. Unless you exclude yourself, you won't be able to sue or continue to sue Plaid for any claim made in this lawsuit or released by the Settlement Agreement. If you exclude yourself, you won't receive a payment. If you stay in the Settlement (i.e., don't exclude yourself), you may object to it or ask for permission for you or your lawyer to appear and speak at the Final Approval Hearing – at your own cost – but you don't have to. Objections and requests to appear are due by **March 4, 2022**. More information about these options is available at www.PlaidSettlement.com.

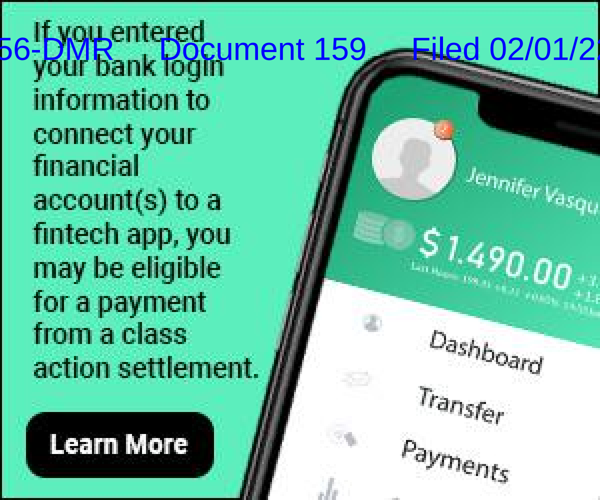
The Court's hearing. The Court will hold the Final Approval Hearing at **1 p.m. on May 12, 2022** in Courtroom 4 (3rd Floor) of the United States Courthouse, 1301 Clay Street, Oakland, CA 94612. At the Final Approval Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court may listen to people who appear at the hearing and who have provided notice of their intent to appear at the hearing. The Court may also consider Class Counsel's application for attorneys' fees, expenses, and Service Awards. At or after the hearing, the Court will decide whether to approve the Settlement and to approve Class Counsel's application for attorneys' fees, expenses, and Service Awards. The date of the Final Approval Hearing may change without further notice, and Class Members should check www.PlaidSettlement.com to confirm that the date has not been changed.

Exhibit E


Have you used a payments app? Did you enter your
for a payment from a class action settlement.

If you entered your bank login information to connect your financial account(s) to a fintech app, you may be eligible for a payment from a class action settlement.

Learn More


If you entered your bank login information to connect your financial account(s) to a fintech app, you may be eligible for a payment from a class action settlement.
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login information?
If so, you may be
eligible for a
payment from a
class action
settlement.
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Robert Ross
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Dashboard
Transfer
Payments

Have you used a payments app? Did you enter your bank login information? If so, you may be eligible for a payment from a class action settlement.

Learn More

If you entered your bank login information to connect your financial account(s) to a fintech app, you may be eligible for a payment from a class action settlement.

Learn More

Have you used a payments app? Did you enter your
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payment from a class action settlement.

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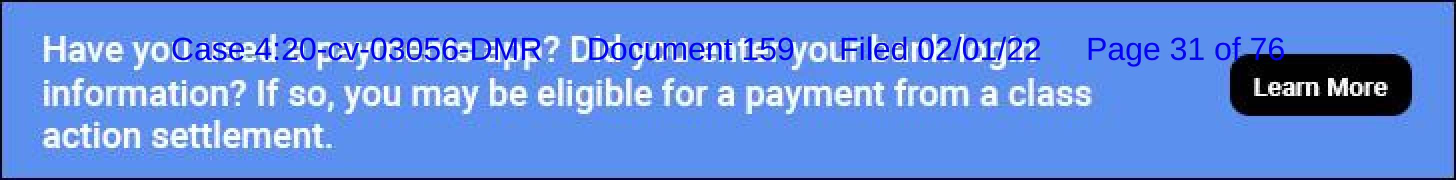
If you entered your bank login information to connect your financial account(s) to a fintech app, you may be eligible for a payment from a class action settlement.

Learn More


information? If so, you may be eligible for a payment from a class
action settlement.
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If you entered your bank login information to connect your financial account(s) to a fintech app, you may be eligible for a payment from a class action settlement.

Learn More

Have you used a payments app? Did you enter your bank login information?
If so, you may be eligible for a payment from a class action settlement.

Learn More

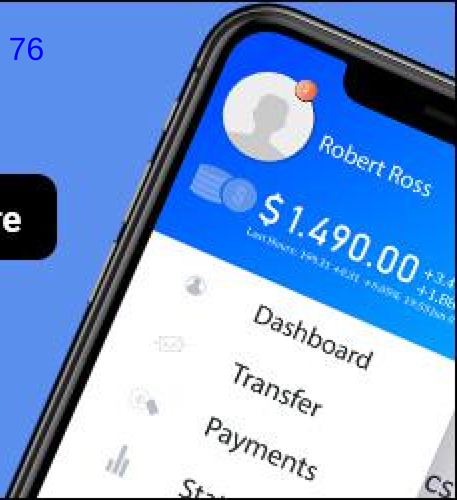

Exhibit F

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Have you used a payments app? Did you enter your bank login information? If so, you may be eligible for a settlement payment.

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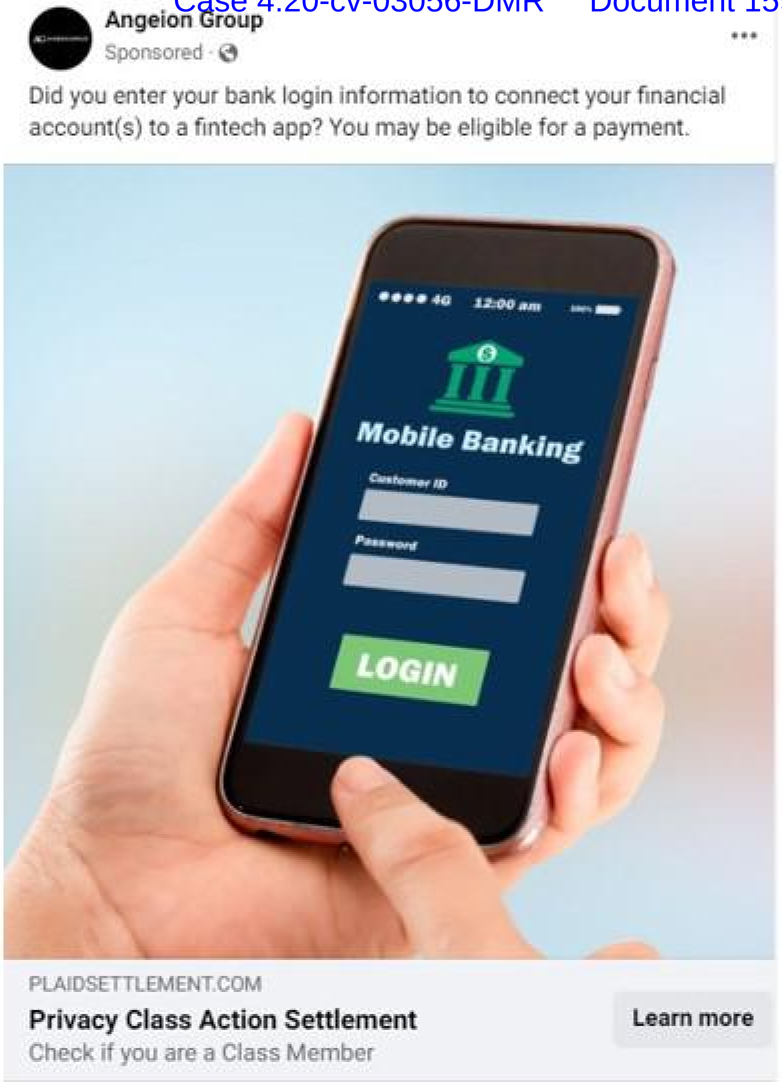
Check if you are a Class Member

Learn more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Did you enter your bank login information to connect your financial account(s) to a fintech app? You may be eligible for a payment.
4G 12:00 am
Mobile Banking
Customer ID
Password
LOGIN
PLAIDSETTLEMENT.COM
Privacy Class Action Settlement
Check if you are a Class Member
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Exhibit G

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Privacy Class Action Settlement

Check if you are a Class Member

Learn more

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Exhibit H

Plaid Data Privacy $58M Class Action Settlement

FOLLOW ARTICLE 111 2 11

By Top Class Actions
January 24, 2022

(Photo Credit: Rawpixel.com/ Shutterstock)

EDITOR'S NOTE: This content has been sponsored and edited for clarity in collaboration with the sponsor.

Plaid Inc. has agreed to pay $58 million to end class action lawsuit claims that it violated data privacy laws.

The settlement benefits any U.S. resident who owns or owned one or more "financial accounts" accessed by Plaid, or for which Plaid obtained their login credentials, between Jan. 1. 2013, and Nov. 19, 2021, and the Class Member was a U.S. resident at the time.

For purposes of this settlement, "financial accounts" refers to any checking, savings, loan, or other account at a financial institution that Plaid accessed using the user's login credentials and connected to a mobile or web application enabling payments or other money transfers, or for which a user provided financial account login credentials to Plaid via Plaid Link.

Plaintiffs in the Plaid data privacy class action lawsuit alleged the company acted improperly when it obtained users' financial account login information.

Plaid Inc. works with more than 5,500 fintech partners, according to its website, powering consumer-facing apps and other services. Some of the more popular apps that use Plaid include Chime, Venmo, and Stripe, among others.

While the exact amount of each Class Member's payment has not yet been determined, each Class Member filing a valid claim will receive an equal proportionate share of the $58 million settlement fund after attorneys' fees and other expenses have been deducted.

Each Class Member may file one claim.

In addition, Plaid must also delete certain data from its systems, inform Class Members of the ability to use Plaid Portal to manage connections and delete data, minimize the

TOP INVESTIGATIONS


Firefighting Foam Cancer | PFAS Chemicals Lawsuit Claim Review


Paraquat Poisoning | Parkinson's Disease, Kidney Failure Lawsuit Claim Review


Mazda Brake Defect Class Action Lawsuit Investigation


Samsung 2-in-1 Chromebook Hinge Defect Class Action Lawsuit Investigation

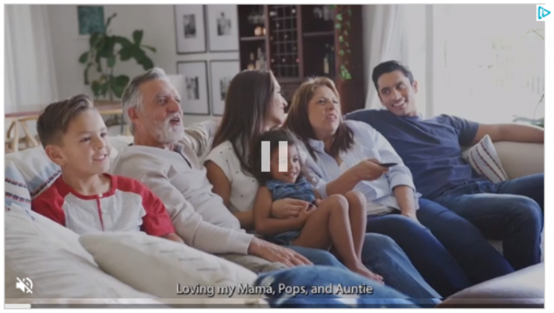

Sexual Abuse in Youth Organizations Lawsuit Claim Review


Baby Powder Cancer Class Action Lawsuit Claim Review

SPONSORED SETTLEMENTS

data the company stores, and take other measures.

A final approval hearing in the Plaid data privacy settlement will take place May 12, 2022.



The deadline for Class Members to object to or exclude themselves from the settlement is March 4, 2022.

Claim forms must be submitted no later than April 28, 2022.

Who's Eligible

Any U.S. resident who owns or owned one or more "financial accounts" accessed by Plaid, or for which Plaid obtained their login credentials, between Jan. 1. 2013, and Nov. 19, 2021, and the Class Member was a U.S. resident at the time.

Potential Award

TBD.

Proof of Purchase

No proof of purchase required.

Claim Form

CLICK HERE TO FILE A CLAIM »

NOTE: If you do not qualify for this settlement do NOT file a claim.

Remember: you are submitting your claim *under penalty of perjury*. You are also harming other eligible Class Members by submitting a fraudulent claim. If you're unsure if you qualify, please read the FAQ section of the Settlement Administrator's website to ensure you meet all standards (Top Class Actions is not a Settlement Administrator). If you don't qualify for this settlement, check out our database of other open class action settlements you may be eligible for.

Claim Form Deadline

04/28/2022

Case Name

In re: Plaid, Inc. Privacy Litigation, Case No. 4:20-cv-03056-DMR in the U.S. District Court for the Northern District of California


Plaid Data Privacy $58M Class Action Settlement

Godiva Chocolates $15M False Advertising Class Action Settlement


TikTok Data Privacy $92M Class Action Settlement


Hudson's Bay Company, Saks, Saks OFF 5TH, Lord & Taylor $2M Data Breach Settlement


Allura Fiber Cement Siding $12.5M Class Action Settlement

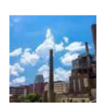

McCormick Perfect Pinch, Gourmet Seasoning $3M Class Action Settlement

TOP NEWS


Vail Commits $13.1M to Settle Wage, Labor Violations Class Action


Consumers Urge Court to Approve $45M Monsanto Settlement In Roundup Class Action

Geico Escapes Some Claims in Excessive Premiums Class Action


83-Year-Old Cancer Survivor Wins $5M Damages From Tobacco Company R.J. Reynolds

DHL Class Action Over 'Secret' Fees Dismissed


11 Months Left in Clergy Abuse Lawsuit Extension in California

Final Hearing	05/12/2022
Settlement Website	PlaidSettlement.com
Claims Administrator	In re: Plaid, Inc. Privacy Litigation c/o Settlement Administrator 1650 Arch Street, Suite 2210 Philadelphia, PA 19103 855-645-1115 Questions@PlaidSettlement.com
Class Counsel	Rachel Geman LIEFF CABRASER HEIMANN & BERNSTEIN LLP Shawn M. Kennedy HERRERA KENNEDY LLP Christopher J. Cormier BURNS CHAREST LLP
Defense Counsel	Michael G. Rhodes Whitty Somvichian Kyle C. Wong Lauren J. Pomeroy Ellie Barczak COOLEY LLP

Exhibit I

ClassAction.org

Claim Deadline: **Apr. 28, 2022**

Plaid Financial App Class Action Settlement

PLAID

If you connected a bank account to an app **(such as Venmo, Stripe, Coinbase or others)** that used Plaid between January 1, 2013 and November 19, 2021, **you may be able to claim a piece of a $58 million settlement.**

It's estimated that **98 million consumers are eligible** – and it's simple and easy to submit your claim today.

The link below will take you to the official website for the Plaid financial app settlement.

TAKE ME TO THE OFFICIAL SETTLEMENT SITE

FAQs

What's Going On?

A settlement has been reached to resolve class action litigation against Plaid, a financial technology company that provides software allowing consumers to easily connect their bank accounts to thousands of apps used to make payments, transfer money, apply for loans and more.

Plaid was accused of obtaining more information than was needed for the apps to function, including login credentials for users' financial accounts.

I've Never Heard of Plaid. That Means I'm Not Affected, Right?

Wrong! As the lawsuit put it, "the typical consumer knows nothing about Plaid," yet more than 5,000 mobile and web-based apps use its software.

It's estimated that 98 million consumers are covered by this settlement.

How Do I File a Claim?

You will have to go to the settlement's dedicated website and click "**submit a claim**."

Alternatively, you can download a **hard copy of the form** from the website and mail it to the address listed on the site.

Which Apps Use Plaid?

Some of the most popular apps that use Plaid are **Venmo, Coinbase, Square's "Cash App" and Stripe,** but you may review further examples at Plaid's company's website.

You can also **run a search** on the settlement site to see if the apps you use run Plaid's software.

What Could I Get?

Claimants are expected to receive the same amount from the $58 million settlement fund regardless of the number of affected apps they used. Payment amounts cannot be determined at this time as they will depend on how many people submit claims.

Am I Covered by the Settlement?

You may be covered by the settlement if you're a U.S. resident and connected one of your bank accounts to an app that used Plaid between January 1, 2013 and November 19, 2021. You can check whether your apps used Plaid's software by **running a search** on the settlement site.

Is There a Deadline for This?

Yes. The deadline for filing a claim with the settlement is April 28, 2022.

The link below will take you to the official website for the Plaid financial app settlement.

TAKE ME TO THE OFFICIAL SETTLEMENT SITE

Exhibit J

United States District Court for the Northern District of California

Notice of Class Action Settlement

In re Plaid Inc. Privacy Litigation

Important Information – Read Carefully.

This is a Court approved Legal Notice. This is not an advertisement.

A Settlement has been proposed in class action litigation against Plaid Inc. ("Plaid"). Approximately 5,000 mobile and web-based applications ("apps") use Plaid to enable users to connect the app to the users' bank account(s). This class action alleges Plaid took certain improper actions in connection with this process. The allegations include that Plaid: (1) obtained more financial data than was needed by a user's app, and (2) obtained log-in credentials (username and password) through its user interface, known as "Plaid Link," which had the look and feel of the user's own bank account login screen, when users were actually providing their login credentials directly to Plaid. Plaid denies these allegations and any wrongdoing and maintains that it adequately disclosed and maintained transparency about its practices to consumers.

You may be a Class Member if you are a United States resident and you connected a financial account to an app between January 1, 2013 and November 19, 2021. More specifically, you are a Class Member if you own or owned one or more "Financial Accounts" (defined in Question 7) that Plaid accessed using your login credentials and connected to a mobile or web-based app that enables payments or other money transfers; or for which you provided Financial Account login credentials to Plaid through Plaid Link; between January 1, 2013 and November 19, 2021.

To search for and confirm whether specific apps or services that connected to your financial account(s) used Plaid for account connections, you can visit the Settlement website at **www.PlaidSettlement.com**.

Under the Settlement, Plaid has agreed to minimize the data it stores going forward, to delete certain previously retrieved data, and to improve and maintain certain already-implemented enhancements to Plaid Link. Class Members are also able to view and manage the connections they've made between their financial accounts and chosen applications using Plaid, and delete data stored in Plaid's systems by creating a Plaid Portal account, at my.plaid.com.

In addition, the Settlement establishes a $58 million Settlement Fund, to be used for cash payments to Class Members who submit valid claims for compensation, after deducting the costs of the settlement administration, court-approved attorneys' fees and expenses, and Service Awards for eleven Class Representatives. The amount of monetary payments issued to Class Members will depend on the number of valid claims received. In exchange for the benefits the Settlement provides, Class Members will release any and all claims they may have (whether known or unknown) regarding the allegations in the Complaint.

The Court will decide whether to approve the proposed Settlement. If approved, the Settlement will resolve the litigation entitled *In re Plaid Inc. Privacy Litigation*, Case No. 4:20-md-03056, which is pending before Judge Donna M. Ryu in the Northern District of California.

The class action settlement approval process may take several months, or more, if there is an appeal.

Please Read this Notice Carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT		
FILE A CLAIM FOR COMPENSATION	You may file a Claim in order to receive a monetary payment from the Settlement Fund. Filing a Claim is the only way to receive a payment from this settlement. For detailed information about how to file a Claim, see Question 16.	**Deadline: April 28, 2022**
EXCLUDE YOURSELF FROM THIS SETTLEMENT	You can exclude yourself from the Settlement by informing the Settlement Administrator that you want to "opt-out" of the Settlement. If the Settlement becomes final, this is the only option that allows you to retain your rights to individually sue for claims relating to the allegations in the Complaint. You will not receive a payment from the Settlement if you exclude yourself.	**Deadline: March 4, 2022**
OBJECT TO OR COMMENT ON THE SETTLEMENT	You may object to the Settlement by writing to the Court about why you don't think the Settlement should be approved. You can also write the Court to provide comments or reasons why you support the Settlement. For detailed information about how to object to or comment on the Settlement, see Question 23.	**Deadline: March 4, 2022**
GO TO THE FINAL APPROVAL HEARING	You may, but are not required to, attend the Final Approval Hearing where the Court may hear arguments concerning the approval of the Settlement. If you wish to speak at the Final Approval Hearing, you must state your intention to do so in your written objection or comment.	**Deadline: May 12, 2022**
DO NOTHING	If you do nothing before the deadline to comment, object, or exclude yourself, and if the Settlement becomes final, you will be part of the Settlement Class and bound by the Settlement and give up your rights to sue for claims relating to any or all allegations in the Plaintiffs' complaint in this case.	Deadline: N/A

What this Notice Contains

Page

What this Notice Contains
(continued)

BACKGROUND INFORMATION

1. Why is there a notice?

A Court authorized this notice because you have a right to know how the proposed Settlement may affect your rights. This notice explains the nature of the litigation, the general terms of the proposed Settlement, and what it may mean to you. This notice also explains the ways you may participate in, or exclude yourself from, the Settlement.

2. What is this litigation about?

The complaint in this case alleges that Plaid took certain improper actions by obtaining log-in credentials to user's financial accounts through a user interface called Plaid Link that the complaint alleges was designed to have the look and feel of the user's bank account login screen, when in fact the username and password were actually being provided to Plaid, and obtaining more financial and other data than was authorized or needed by a user's app. The time period at issue is January 1, 2013 to November 19, 2021.

Plaid enables connections between a user's financial account and approximately 5,000 mobile and web-based apps that consumers use to make payments, transfer money, pay bills, manage their personal finances, make investments, and apply for loans, among other finance-related activities. For examples of the types of apps that use Plaid, you can review Plaid's website at www.plaid.com (including https://plaid.com/discover-apps/) or you can refer to Paras. 3 and 4 of the Plaintiffs' Consolidated Amended Complaint, available at www.PlaidSettlement.com.

To confirm whether specific apps or services that connected to your financial account(s) used Plaid for the account connections, you can run a search on the Settlement website at www.PlaidSettlement.com.

The lawsuit was brought on behalf of the individuals who allegedly believed based on the design of Plaid Link that they were providing login credentials directly to their banks, and/or whose accounts at financial institutions Plaid accessed using the user's login credentials and connected to a web-based or mobile payment or money transfer app. Plaid denies any wrongdoing and all of the allegations in the lawsuit; no court or other entity has made any findings against Plaid nor any determination that the law has been violated.

The current complaint filed in this litigation, which describes the specific legal claims alleged by the Plaintiffs and the relief sought, is available on the Settlement Website, at www.PlaidSettlement.com. You can also find a copy of the Court's order on Plaid's motion to dismiss the Plaintiffs' legal claims, which sustained some claims and dismissed others, on the Settlement Website at www.PlaidSettlement.com.

3. Who is the defendant in the lawsuit?

The Defendant is Plaid Inc., a financial technology corporation. Plaid is a Delaware corporation with its principal place of business in San Francisco, California. You can learn more about Plaid at www.plaid.com.

4. Why is this a class action?

In a class action, one or more people file a lawsuit to assert legal claims on behalf of themselves and other persons who have experienced the same or similar circumstances. Here, eleven people who are proposed Class Members filed class action complaints and serve as named Plaintiffs and "Class Representatives" in the consolidated amended lawsuit. In this capacity, they represent the interests of all the Class Members.

Even if you have not filed your own lawsuit against Plaid regarding the allegations described in this notice, if you are a Class Member, this Settlement still affects you because the Settlement applies to all Class Members.

5. Why is there a settlement?

The Court has not decided in favor of Plaintiffs or Plaid on the ultimate merits of Plaintiffs' claims. Instead, both sides agreed to a Settlement. Settlements avoid the costs and uncertainty of a trial and appeals, while providing benefits to Class Members when the Settlement becomes final. Class Representatives and the attorneys for the Class ("Class Counsel," *see* Question 10) believe that the Settlement is in the best interests of the Class Members.

CLASS MEMBERSHIP

6. Who is part of the Settlement?

You are a Class Member, and you are affected by this Settlement, if you are a United States resident and:

(1) own or owned one or more "Financial Accounts" (see definition in Question #7);

(2) Plaid (a) accessed your Financial Account; or (b) obtained your Financial Account login credentials, between January 1, 2013 and November 19, 2021; and

(3) You were a United States resident at the time (2)(a) or (b) occurred. See Questions 7, 8, and 9 for more information about these terms.

The following entities and individuals are **not** Class Members:

- Plaid and any and all of its predecessors, successors, assigns, parents, subsidiaries, affiliates, directors, officers, employees, agents, representatives, and attorneys, and any and all of the parents', subsidiaries', and affiliates' present and former predecessors, successors, assigns, directors, officers, employees, agents, representatives, and attorneys;

- Any judicial officer presiding over the Action, or any member of his or her immediate family or of his or her judicial staff; and

- Any individual who meets the class definition and who timely and validly excludes themselves from the Settlement.

7. What does "Financial Account" mean in the Settlement?

"Financial Account" means any checking, savings, loan, or other account at a financial institution (1) that Plaid accessed using the user's login credentials and connected to a mobile or web-based financial technology application that enables payments (including ACH payments) or other money transfers or (2) for which a user provided financial account login credentials to Plaid through Plaid Link. A Financial Account does not include an account that was connected, or for which credentials were provided, exclusively through an OAuth Process or Managed OAuth Process.

"Managed OAuth Process" means a process through which Plaid obtains login credentials in order to secure an access token pursuant to a formal agreement with the applicable financial institution and does not store those login credentials.

"OAuth Process" means a process through which Plaid redirects an end user to the financial institution's domain to enter their login credentials and does not obtain login credentials for the end user.

8. What is Plaid Link?

"Plaid Link" means a consumer-facing interface developed by Plaid, as incorporated in mobile or web-based applications or services, that guides an end user through the process of linking a financial institution account to the application or service via Plaid.

The Complaint in this case alleges that Plaid authenticates app users' bank accounts through methods that are different from other methods of authenticating bank accounts because it is "instant," and does not require "micro-deposits" where the user returns to verify the amount of small deposits made to their accounts in order to verify that they own the account. In a Plaid Link interface, the user is prompted to input their bank username and password in order to verify the account.

You can see examples of historical versions of Plaid Link on the Settlement website, at www.PlaidSettlement.com, and at pages 9-10 and 21-25 of the Complaint, available on the Settlement website, at www.PlaidSettlement.com. You can also check whether apps or services that you connected to your financial account used Plaid for the connection by searching on the Settlement website, at www.PlaidSettlement.com.

9. How do I know whether I am a member of the Class?

If you received a Notice of this Settlement by mail or email, you have been identified by the Settlement Administrator as a Class Member. If you did not receive a Notice by mail or email, you may still be a Class Member.

You can check whether apps or services that you connected to your financial account used Plaid for the connection by searching on the Settlement website, at www.PlaidSettlement.com. You can see examples of historical versions of Plaid Link on the Settlement website, at www.PlaidSettlement.com, and at pages 9-10 and 21-25 of the Complaint, available on the Settlement website, at www.PlaidSettlement.com.

If you are still not sure whether you are a Class Member, you may visit the FAQs section of the Settlement website, at www.PlaidSettlement.com, or contact the Settlement Administrator by mail at *In re Plaid, Inc. Privacy Litigation*, c/o Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103, or call the Settlement Administrator's toll-free number at 855-645-1115 for more information that may help you determine whether or not you are a Class Member.

THE LAWYERS FOR CLASS MEMBERS

10. Do I have a lawyer in the case?

If you are a Class Member, you have a lawyer in this case. The Court appointed as "Class Counsel" the law firms Burns Charest LLP; Herrera Kennedy LLP; and Lieff Cabraser Heimann & Bernstein, LLP to represent the Class Members. If you want to be represented by your own lawyer, you may hire one at your own expense.

You may contact Class Counsel using the following information:

Rachel Geman
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013-1413
rgeman@lchb.com

Shawn M. Kennedy
HERRERA KENNEDY LLP
4590 MacArthur Blvd., Suite 500
Newport Beach, CA 92660
skennedy@herrerakennedy.com

Christopher J. Cormier
BURNS CHAREST LLP
4725 Wisconsin Avenue, NW, Suite 200
Washington, DC 20016
ccormier@burnscharest.com

11. How will Class Counsel be paid?

Class Counsel will apply to the Court to be paid from the Settlement Fund, and any payment will be made only in the amount that is approved by the Court.

Class Counsel will ask the Court to award up to $14.5 million for attorneys' fees from the Settlement Fund (25% of the Settlement Fund). Class Counsel will also ask the Court to approve Service Awards of up to $5,000 each for the eleven Class Representatives named in the complaint as an award for their service to the Settlement Class as Plaintiffs and Class Representatives ($55,000 in total) out of the Settlement Fund. In addition, Class Counsel will ask the Court to reimburse them out of the Settlement Fund for the expenses they reasonably incurred and will incur in litigating this case on behalf of Class Members (including amounts charged by the Settlement Administrator for settlement administration).

The amount of the Settlement Fund that remains after the payment of all Court-approved attorneys' fees, Service Awards, and reimbursement of expenses will be distributed to Class Members who have submitted valid claims for compensation and have not timely excluded themselves from the Settlement in a manner approved by the Court.

Class Counsel and Plaid have not discussed the issue or amount of attorneys' fees in their negotiations of this Settlement; Plaid has the right to oppose Class Counsel's application for fees, reimbursement of expenses, and Service Awards to Class Representatives, and Class Members have the right to object. The Court will decide the attorneys' fees and expenses and Service Awards to be paid. Any attorneys' fees, expenses, or Service Awards approved by the Court will be paid from the $58 million Settlement Fund.

Class Counsel's application for attorneys' fees, expenses, and Service Awards will be made available on the Settlement Website at www.PlaidSettlement.com before the deadline for you to comment on or object to the Settlement. You can also request a copy of the application by contacting the Settlement Administrator at Questions@PlaidSettlement.com.

BENEFITS FOR CLASS MEMBERS

12. What nonmonetary benefits does the Settlement provide?

The Settlement requires Plaid to:

- Delete certain data from Plaid systems;
- Inform Class Members of their ability to use Plaid Portal to manage the connections made between their financial accounts and chosen applications using Plaid and delete data stored in Plaid's systems;
- Continue to include certain disclosures and features in Plaid's standard Link flow;
- Enhance disclosures about Plaid's data collection practices, how Plaid uses data, and privacy controls Plaid has made available to users in Plaid's End User Privacy Policy;
- Minimize the data that Plaid stores; and
- Continue to host a dedicated webpage with detailed information about Plaid's security practices.

Most of these requirements will be implemented no more than 180 days after the Court has entered a final judgment that has come into effect (i.e., the final judgment can no longer be appealed and has not been modified or reversed on appeal), and will apply for three years in the United States. For a full list of non-monetary benefits, including those that were implemented or finalized, in part, after this lawsuit was initially filed, see paragraphs 52-70 of the Settlement Agreement, at www.PlaidSettlement.com. A summary of these nonmonetary benefits of the settlement is provided below.

Data Deletion from Plaid Systems

As part of the Settlement, Plaid will, to the extent not already deleted, delete the following data:

- Data retrieved as part of Plaid's Transactions product, including information about account transactions, such as transaction date, amount, category, merchant, and location, for users that Plaid can reasonably determine did not connect an account to an application that requested Transactions data. This means, for example, if you used an application that did not ask Plaid to collect data about transactions you made, but Plaid accessed that data anyway, then Plaid will delete that data from its systems.

- In accordance with its internal data deletion policies, data for users that Plaid is aware it no longer has valid means that can be used to authenticate with the bank. This means, for example, if Plaid determines that the password it obtained for a particular bank account has changed, or that the account has been closed, Plaid will delete the data associated with that account from its systems.

- It is important to understand that Plaid is not required to delete data retrieved as part of another Plaid product for which you currently have an active connection. For example, if you connect an app that requests data from a particular Plaid product and Plaid collects that requested data for that app, such data will not be deleted even if it overlaps with other data that would otherwise be covered by this section.

Plaid Portal

By creating a Plaid Portal account, users, including Class Members, can view and manage the connections between financial accounts and chosen applications made using Plaid, and delete data stored in Plaid's systems. Currently, the website for Plaid Portal is my.plaid.com (see Question 15).

As part of the Settlement, Plaid will provide a prominent reference to Plaid Portal on its website homepage (www.plaid.com), along with a link to Plaid Portal and a plain-language description of the user controls available through Plaid Portal. Plaid will also take reasonable commercial efforts to send periodic email reminders to Plaid Portal account holders generally describing the user controls available in Plaid Portal, including the ability to disconnect applications from their financial accounts and delete data stored in Plaid's systems.

Clear Disclosures at the Time of Account Connection

As part of the Settlement, Plaid has committed to ensuring that Plaid's standard Link flow includes the following:

- The credentials pane, meaning the page where users enter their financial account username and password, will continue to explain that the credentials are being "provided to Plaid."

- The background color of the credentials pane will not utilize the color scheme associated with a specific financial institution for that financial institution.

- A separate pane will continue to a) refer expressly to Plaid and explain that Plaid is used to link the user's accounts, b) include a conspicuous link to Plaid's End User Privacy Policy, and c) require the user to agree to Plaid's End User Privacy Policy by taking clear affirmative action (e.g., by clicking "Continue").

In addition, Plaid has made the following changes that were implemented or finalized, in part, after the filing of the initial class action complaint in this litigation:

- The addition of the following language to the credentials pane of Plaid's standard Link flow for relevant products: "By providing your [financial institution name] credentials to Plaid, you're enabling Plaid to retrieve your financial data."

- The addition of a link entitled "Why is Plaid involved?" to the institution selection pane of Plaid's standard Link flow, which opens to the following text: "Plaid lets you connect your financial accounts to apps and services. This is a service provided by Plaid. The connection Plaid provides to your financial account(s) does not imply affiliation with any financial institution."

Minimizing the Data Plaid Stores

As part of the Settlement, Plaid will minimize the amount of information that it stores from users' financial accounts.

- With respect to data retrieved from users' financial accounts, subject to certain limitations such as for compliance with applicable law, Plaid will only store the categories of data for the Plaid product(s) that the user's application specifically requests from Plaid or that are necessary for Plaid to offer its services, unless the user has expressly consented to the retrieval of additional data.

- Plaid will use its best efforts to continue to inform the applications that use Plaid about its /item/remove endpoint, which is a means for those applications to inform Plaid that a user has terminated their account with the application, which then terminates the application's access to data from Plaid, and may lead to data deletion from Plaid's systems (if such data is not actively used by another application).

Enhancing Disclosures about What Plaid is and Does

As part of the Settlement, in addition to the disclosures and controls discussed above, Plaid will enhance its End User Privacy Policy (EUPP) to provide more detailed information about Plaid's data collection, storage, use, sharing, and deletion practices. For all Plaid products, including newly launched products, the EUPP will:

- Provide more detail about the categories of personal information Plaid collects from users' financial accounts for each Plaid product, including a plain-language list of the categories of personal information Plaid collects and a plain-language statement of the general reasons the categories are collected.

- Provide more detail about how Plaid uses data, including by providing, for each category of personal information that Plaid collects about users, the categories of sources of the personal information, the categories of uses for which Plaid collects the information, and the categories of parties, if any, with whom Plaid shares the information (for example, the developer of the user's application).
- Provide a plain-language explanation of Plaid's deletion and retention practices related to personal information.
- Provide a dedicated section explaining in plain-language terms the privacy controls Plaid has made available to users (e.g., "Privacy Control Section").

In addition, Plaid launched certain consumer education pages after this litigation was filed, which describe Plaid's data practices, such as https://plaid.com/how-we-handle-data/; https://plaid.com/why-is-plaid-involved/; and https://plaid.com/discover-apps/.

More details about the changes that Plaid has made or agreed to make as a result of the Settlement are available in Paragraphs 52-70 of the Settlement Agreement, which is available on the Settlement Website, at www.PlaidSettlement.com.

13. What monetary benefits does the Settlement provide?

Under the Settlement, Plaid will pay $58 million to establish a Settlement Fund.

After deducting any court-approved attorneys' fees and expenses and Service Awards for the Class Representatives, and the costs of the settlement administration, the Settlement Fund will be distributed to Class Members on a *pro rata* basis. The amount of the payments to individual Class Members will depend on the number of valid claims that are filed. Class Members will be able to choose whether to receive their payment via PayPal, Venmo, ACH Transfer, or paper check. Because the final payment amount cannot be calculated before all claims for compensation are received and verified, it will not be possible to provide an estimate of the payment amount before the deadline to file claims.

In the event that any PayPal, Venmo, or ACH Transfer transfers fail or any paper checks are uncashed, the Settlement Administrator will make a second *pro rata* payment based on the non-transferred funds to Class Members who filed valid claims and provided valid electronic payment information. In the event that the number of Class Members who file valid claims would result in either an initial or secondary *pro rata* payment amount that the Parties, in consultation with the Settlement Administrator and a neutral mediator, determine is too small to economically distribute to Class Members, Class Counsel will seek Court approval to distribute the funds through a next-best alternative, to one or more non-profit organizations that have a track record of addressing consumer financial privacy and internet technology concerns, who will commit to use any funds they receive for activities intended to benefit all Class Members. The proposed non-profit organizations, also known as the proposed "Cy Pres Recipients," are Privacy Rights Clearinghouse and Consumer Reports.

14. Will all Class Members who file claims receive the same amount?

Yes. Each Class Member who submits a valid claim for compensation will be paid one equal *pro rata* share from the Net Settlement Fund (the $58 million Settlement Fund minus any award of attorneys' fees and expenses, settlement administration costs, and Service Awards for the Class Representatives). Each Class Member is entitled to submit only one claim for compensation from the Net Settlement Fund regardless of the number of applications they have connected to financial accounts via Plaid, or the number of their financial accounts that have been connected to apps. Because the final payment amount cannot be calculated before all claims for compensation are received and verified, it is not possible to provide an estimate of the payment amount before the deadline to file claims.

15. How do I control who has access to my data?

You can create a Plaid Portal account to view and manage the connections you've made using Plaid and delete data stored in Plaid's systems. Currently, Plaid Portal is available at my.plaid.com. Pursuant to the Settlement, Plaid will also post a link to the Plaid Portal on its website, www.plaid.com, where you can create or access your Plaid Portal account.

After creating a Plaid Portal account, you can use the Portal to securely manage the connections between your financial accounts and chosen applications made using Plaid. Plaid Portal allows you to see the types of data shared with each app, disconnect apps from your financial accounts any time, and delete your data stored in Plaid's systems.

HOW TO FILE A CLAIM

16. How do I file a claim for compensation?

To claim a cash payment, you need to file a claim form. There are two options to file your claim:

> (1) File Online: You may fill out and submit the claim form online at www.PlaidSettlement.com. This is the quickest way to file a claim.
>
> (2) File by Mail: Alternatively, you can download a hard copy of the claim form (available at www.PlaidSettlement.com/important-documents), or ask the Settlement Administrator to mail a claim form to you by calling 855-645-1115. Fill out your claim form, and mail it (including postage) to: *In re Plaid, Inc. Privacy Litigation*, c/o Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

The deadline to file a claim is **April 28, 2022** (this is the last day to file online and postmark deadline for mailed claims).

17. Can I submit multiple claims if I have more than one Financial Account that I connected through Plaid?

No. Each Class Member may submit only one claim, even if they own multiple Financial Accounts that they connected through Plaid.

18. Can I submit multiple claims if I connected more than one app or service to my Financial Account?

No. Each Class Member may submit only one claim, even if their Financial Account(s) were connected to multiple apps or services through Plaid.

19. What happens if my claim is not accepted?

The Settlement Administrator may reject Claim Forms that are duplicates of another claim, are reasonably suspected to be fraudulent, or are submitted after the deadline. The Settlement Administrator may also reject Claim Forms submitted by individuals it reasonably determines are not members of the Class. Before rejecting a claim, the Settlement Administrator will notify the claimant and give the claimant two weeks from the date of notice to correct any deficiency.

20. When and how will I receive the benefits I claim from the Settlement?

Payments for valid claims will be made after the Settlement becomes final by the means designated on your claim form. You may select payment via PayPal, Venmo, ACH Transfer, or paper check. The Settlement will become final only if, and after, Final Approval is granted by the Court and any appeals to Final Approval of the Settlement are resolved. This process may take longer than one year. Please be patient.

21. What happens if my contact information changes after I submit a Claim?

If, after you submit a claim form, you change your mailing address, email address, or the PayPal, Venmo, or ACH Transfer information provided on your claim form, it is your responsibility to inform the Settlement Administrator of your updated information. You may do so by contacting the Settlement Administrator using the contact information in Question 33.

LEGAL RIGHTS RESOLVED THROUGH THE SETTLEMENT

22. What am I giving up to stay in the Settlement Class?

If you do not exclude yourself from the Settlement Class, you will be releasing all of your legal claims relating to the allegations in the Plaintiffs' complaint. You may view the complaint on the Settlement Website at www.PlaidSettlement.com.

The claims you are giving up are called "Released Claims," and they are defined in paragraph 45 of the Settlement Agreement. You will be releasing the Released Claims against Plaid and any and all of its present or former predecessors, successors, assigns, parents, subsidiaries, affiliates, directors, officers, employees, agents, representatives, and attorneys, and any and all of the parents', subsidiaries', and affiliates' present and former predecessors, successors, assigns, directors, officers, employees, agents, representatives, and attorneys, in connection with the Released Claims, when the Settlement becomes final.

By releasing your legal claims, you are giving up the right to file any type of legal action against, or seek further compensation from, Plaid and the other released individuals and entities listed above based on those claims. If you are a Class Member, all of the decisions by the Court will bind you unless you exclude yourself from the Settlement (see Questions 29-31). That means you will be bound to the terms of the Settlement and accompanying Court order, and cannot bring any type of legal action, or be part of another legal action against Plaid or the other entities listed in the paragraph above regarding the allegations in Plaintiffs' complaint.

Paragraph 45 of the Settlement Agreement defines the claims that will be released by Class Members who do not exclude themselves from the Settlement. You can access the Settlement Agreement and read the details of the legal claims being released at www.PlaidSettlement.com. If you have any questions about what this means, you can contact Class Counsel or the Settlement Administrator (see Question 10).

OBJECTING TO THE SETTLEMENT

23. If I don't like the Settlement, how do I tell the Court?

If you do not exclude yourself from the Settlement, you can ask the Court to deny approval by filing an objection. You can object to any aspect of the Settlement, to Class Counsel's request for attorneys' fees and expenses, or to the request for Service Awards.

Objecting to the Settlement means asking the Court to deny approval to the Settlement. You can't ask the Court to order a larger monetary payment from Plaid as part of the Settlement, or to change the commitments Plaid has agreed to make under the Settlement. The Court can only approve or reject the Settlement the parties have proposed. If the Court denies approval of the Settlement, Plaid will not be required to comply with the terms of the Settlement Agreement, no Settlement payments will be sent out, and the lawsuit will continue. If that is what you want to happen, you must object.

If you chose to make an objection, it must be in writing and contain the following:

a. The name and case number of this lawsuit (*In re Plaid Inc. Privacy Litigation*, the case number is 4:20-cv-03056);

b. The basis for believing that you are a Class Member;

c. Your full name and mailing address, and email address or telephone number;

d. All reasons for your objection;

e. Whether you intend to appear at the Final Approval Hearing, either in person or through an attorney representing you, and, if through an attorney, the attorney's name, address, and phone number;

f. Your handwritten or electronically imaged written (*e.g.*, "DocuSign") signature. An attorney's signature, or a typed signature, is not sufficient.

To be considered by the Court, your objection must be either (1) filed at any location of the United States District Court for the Northern District of California on or before **March 4, 2022**, or (2) mailed, postmarked no later than **March 4, 2022**, to the following recipient:

Clerk of Court
United States District Court for the Northern District of California
1301 Clay Street
Oakland, CA 94612

24. What is the difference between objecting and excluding myself?

You object to the Settlement when you disagree with some aspect of the Settlement and think the Court should not give Final Approval to the Settlement. An objection, like a comment, allows your views to be heard in Court.

Excluding yourself from the Settlement means that you are no longer a Class Member and don't want the Settlement (including monetary payments) to apply to you. Once you are excluded, you lose any right to object to any aspect of the Settlement because the case no longer affects you.

25. Do I need to attend the Final Approval Hearing if I file an objection?

If you file a timely written objection, you may, but are not required to, appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

FINAL APPROVAL HEARING

26. When and where will the Court decide whether to approve the Settlement?

The Court will hold the Final Approval Hearing at **1 p.m.** on **May 12, 2022** in Courtroom 4 (3rd Floor) of the United States Courthouse, 1301 Clay Street, Oakland, CA 94612. The hearing may be postponed to a different date or time or location without notice. The hearing may be scheduled to occur telephonically or by videoconference. Please check www.PlaidSettlement.com, or Judge Donna M. Ryu's Calendar (available at https://apps.cand.uscourts.gov/CEO/cfd.aspx?71BQ) for any updates about the Settlement or the Final Approval Hearing. If the date or time, or the format, of the Final Approval Hearing changes, an update to the Settlement Website or the Court's Calendar is the only way you will be informed of the change.

At the Final Approval Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court may listen to people who appear at the hearing and who have provided notice of their intent to appear at the hearing (*see* Question 23). The Court may also consider Class Counsel's application for attorneys' fees, expenses and for Service Awards. At or after the hearing, the Court will decide whether to approve the Settlement and to approve Class Counsel's application for attorneys' fees, expenses and Service Awards.

27. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish. If you submit a written objection, you may, but you do not have to, come to Court to talk about it. As long as you submitted your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not required.

28. May I speak at the hearing?

At that hearing, the Court will at its discretion hear any objections and arguments concerning the fairness of the Settlement.

You may attend the hearing, but you do not have to. As described above in response to Question 23, you may speak at the Final Approval Hearing if (a) you have mailed your written comment or objection to the Court on or before the postmark deadline, and (b) you identified in your comment or objection whether you intend to appear at the Final Approval Hearing.

You cannot speak at the hearing if you exclude yourself from the Settlement Class.

EXCLUDING YOURSELF FROM THE SETTLEMENT

29. How do I exclude myself from the Settlement?

If you want to keep the right to sue or continue to sue Plaid or the other released entities (see Question 22) based on claims this Settlement resolves, you must exclude yourself from the Class (sometimes called "opting out").

To exclude yourself from the Settlement, you must send a letter by mail to the Settlement Administrator saying that you wish to do so. Your exclusion letter must include:

a. The name and case number of this lawsuit (*In re Plaid Inc. Privacy Litigation*, case number is 4:20-cv-03056);

b. Your full name and mailing address, email address, or telephone number;

c. The words "Notification of Exclusion" or a statement that you want to be excluded from the Settlement; and

d. Your handwritten or electronically imaged written (*e.g.*, "DocuSign") signature. An attorney's signature, or a typed signature, is not sufficient.

You must mail your exclusion letter, postmarked no later than **March 4, 2022**, to:

In re Plaid Inc. Privacy Litigation
Attn: Exclusion
P.O. Box 58220
Philadelphia, PA 19102

You cannot exclude yourself by mailing a notification to any other location or after the deadline of **March 4, 2022**. You cannot exclude yourself by telephone or by email. Your exclusion letter must be signed by you, personally, and not your lawyer or anyone else acting on your behalf. "Mass" or "class" opt-outs made on behalf of multiple persons or classes of persons will be deemed invalid.

30. If I do not exclude myself, can I sue Plaid for the same thing later?

No. Unless you exclude yourself, you give up the right to sue Plaid for the claims that this Settlement resolves.

31. If I exclude myself, am I still represented by Class Counsel?

No. Class Counsel represents the members of the Settlement Class. If you exclude yourself from the Settlement Class, you are not represented by Class Counsel.

DOING NOTHING

32. What happens if I do nothing?

If you do nothing, and if the Settlement becomes final, you will be part of the Settlement Class and will receive the payment(s) described above in Question 13. You will give up your rights to sue Plaid (or continue to sue) or related entities (see Question 22) for claims arising out of or related to the allegations in the Plaintiffs' complaint.

GETTING MORE INFORMATION

33. How do I get more information?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement itself. You can get a copy of the Settlement Agreement, view other case documents, and get additional information, updates, and answers to Frequently asked Questions, by visiting www.PlaidSettlement.com.

All of the case documents that have been filed publicly in this case are also available online through the Court's Public Access to Court Electronic Records (PACER) system at https://ecf.cand.uscourts.gov. This case is called *In re Plaid Inc. Privacy Litigation*, and the case number is 4:20-cv-03056. You may obtain case documents by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, San Francisco Division, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

You can also get additional information or request a copy of the Settlement Agreement by calling toll-free 855-645-1115 or writing to the Settlement Administrator via email to Questions@PlaidSettlement.com or by mail to *In re Plaid, Inc. Privacy Litigation*, c/o Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT.

Exhibit K

In re Plaid, Inc. Privacy Litigation

Case No. 4:20-md-03056

United States District Court for the Northern District of California

HOME | SUBMIT A CLAIM | IMPORTANT DOCUMENTS | SEARCH FOR APP/SERVICE | FAQS | CONTACT US

If you received a personalized notice in the mail or via email with a **Notice ID** and **Confirmation Code**, please enter the codes you were provided below.

Please remember to enter the full Notice ID exactly as it appears on your personalized Notice, (i.e. 12345678).

Notice ID

Confirmation Code

Submit

OR

If you did not receive a personalized Notice in the mail or via email, click below to complete a Claim Form.

Click Here

For more information on how to file a claim, please watch the video below.

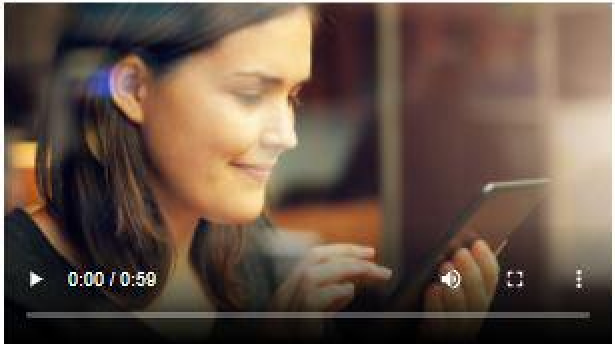


Exhibit L

Friday, January 14, 2022

In re Plaid Inc. Privacy Litigation, the case number is 4:20-cv-03056 – DMR

Notice ID: PLD1007509370
Confirmation Code: 5040A53475

To Whom It May Concern,

I received a settlement email about the case against Plaid Inc.

I do not intend to appear in court. I just want to make a comment on something that I object to in the case.

N/C

In the case it states "*….obtained log-in credentials (username and password) through its user interface, known as "Plaid Link," which had the look and feel of the user's own bank account login screen, when users were actually providing their login credentials directly to Plaid.*"

Plaid's interface did not mimic or did not have the look and feel of my bank's account login screen. The interface had Plaid's colors and logo and did not have any information or colors related to my bank's login page. Phishing scams purposefully mimic a bank's login page, but Plaid's interface did not do this.

Sincerely,

Richard Laven
5874 Woodbriar Dr NE
Belmont, MI 49306

rick@laven.net
616-551-9554

Laven
5874 Woodbriar Dr NE
Belmont, MI 49306

GRAND RAPIDS MI 493
18 JAN 2022 PM 3 L

Clerk of Court
US Dist Ct for North Dist of CA
1301 Clay St
Oakland, CA 94612

94612-521299

Exhibit M

CALIFORNIA JUDICIAL INVESTIGATIONS
BSIS LIC No. 24115

1968 S. Coast Hwy, No. 755
Laguna Beach, CA 92651
Phone: (415) 829-9060
Fax: (415) 500-4060

Website: www.calji.com
Email: admin@calji.com

FILED

Jan 26 2022

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

January 25, 2022

Via U.S. Mail and Electronic Mail dmrcrd@cand.uscourts.gov

Honorable Magistrate Judge Donna M. Ryu
United States District Court
Northern District of California
Oakland Courthouse, Courtroom 4 – 3rd Floor
1301 Clay Street, Oakland, CA 94612

RE: Cottle v Plaid, Inc.
Case No. 20-cv-03056-DMR

Dear Honorable Magistrate Judge Donna M. Ryu,

It is my understanding that a settlement has been reached in the above-reference matter. Please accept this as a formal objection to the settlement until the following has been addressed by this court.

The Plaintiff's counsel apparently subcontracted notice of settlement to a company operating out of Pennsylvania. On or about January 12, 2022, an email was sent out to class members. In part, the email provided limited information about the claim and how to obtain a payment.

First, the notice lacks any specific link that takes the claimant to a claims form. It requires that the party cut/paste text from the email and open a new page to reach the claim form. It is my belief that this is designed purposely to limit the number of claims that are filed. If the goal was to promote a response, a link to **submit a claim** would have been included.

Second, the claim form itself is defective and does not work. Once I reached the correct website and clicked on SUBMIT A CLAIM, I entered valid bank details. I was repeatedly presented with an "error" code which stated the account information I provided was invalid - when in fact the information is valid. That said, myself and others similarly situated would typically give up and close the window – forgoing any payment due.

Third, and most importantly, the website claim form denies equal access of settlement funds to all class members. Specifically, the online claim form offers only **three** methods to be paid. The claimant must select only ONE of the following options: PayPal, Venmo or Direct Deposit to a bank account. This places a condition to be paid – the claimant must have an account with a financial institution, or they cannot get paid. This denies payment to those without a bank account (i.e. homeless, indigent, those who can't quality for a bank account, etc). The convenience to the claims administrator of paying all claims electronically must take a back seat to ensuring that all payments reach their intended class members.

For these reasons, I respectfully request this court to suspend final settlement of this case until the Plaintiff can provide proof to the court that these concerns have been addressed.

Thank you for your consideration.

Respectfully,

Joseph P. Soldis
Investigator PI24115

Notice of Class Action Settlement – In re Plaid Inc. Privacy Litigation

From: Settlement Administrator (donotreply@plaidsettlement.com)

To: [redacted]

Date: Wednesday, January 12, 2022, 02:41 AM PST

Notice ID: PLD1010341268

Confirmation Code: 798D68C581

Notice of Class Action Settlement - In re Plaid Inc. Privacy Litigation

If you connected your financial account(s) to a mobile or web-based app that has used Plaid between January 1, 2013 and November 19, 2021 in the United States, you may be eligible for a payment from a class action Settlement.

This is a Court-approved Legal Notice. This is not an advertisement.

A Settlement has been proposed in class action litigation against Plaid Inc. ("Plaid"). Plaid enables connections between a user's financial account(s) and approximately 5,000 mobile and web-based applications ("apps"). This class action alleges Plaid took certain improper actions in connection with this process. The allegations include that Plaid: (1) obtained more financial data than was needed by a user's app, and (2) obtained log-in credentials (username and password) through its interface, known as Plaid Link, which the litigation alleges had the look and feel of the user's own bank account login screen, when users were actually providing their login credentials directly to Plaid. Plaid denies these allegations and any wrongdoing and maintains that it adequately disclosed and maintained transparency about its practices to consumers.

Who is Included? You are a Class Member, and you are affected by this Settlement, if you own or owned one or more "Financial Accounts" between January 1, 2013 and November 19, 2021, and you were a United States resident at the time. A "Financial Account" is any checking, savings, loan, or other account at a financial institution (1) that Plaid accessed using the user's login credentials and connected to a mobile or web-based fintech application that enables payments (including ACH payments) or other money transfers or (2) for which a user provided financial account login credentials to Plaid through Plaid Link.

What does the Settlement provide? Under the Settlement, Plaid will pay $58 million to establish a Settlement Fund.

After deducting any court-approved attorneys' fees and expenses and Service Awards for the Class Representatives, and the costs of the Settlement administration, the Settlement Fund will be distributed to Class Members who submit valid claims, on a pro rata basis. The amount of the payments to individual Class Members will depend on the number of valid claims that are filed.

The Settlement also requires Plaid to:

- Delete certain data from Plaid systems;
- Inform Class Members of their ability to use Plaid Portal to manage the connections made between their financial accounts and chosen applications using Plaid and delete data

[redacted]

stored in Plaid's systems;

- Continue to include certain disclosures and features in Plaid's standard Link flow;
- Enhance disclosures about Plaid's data collection practices, how Plaid uses data, and privacy controls Plaid has made available to uses in Plaid's End User Privacy Policy;
- Minimize the data that Plaid stores; and
- Continue to host a dedicated webpage with detailed information about Plaid's security practices.

How do I get a payment? You must submit a valid Claim Form online or postmarked by **April 28, 2022**. Claim Forms may be submitted online at www.PlaidSettlement.com or printed from the website and mailed to the address on the Claim Form. Claim Forms are also available by calling 855-645-1115 or emailing Questions@PlaidSettlement.com.

Do I have a lawyer in the case? If you are a Class Member, you have a lawyer in this case. The Court appointed as "Class Counsel" the law firms Burns Charest LLP; Herrera Kennedy LLP; and Lieff Cabraser Heimann & Bernstein, LLP to represent the Class Members. If you want to be represented by your own lawyer, you may hire one at your own expense.

Your other options. If you are included in the Settlement and do nothing, your rights will be affected and you won't get a payment. If you don't want to be legally bound by the Settlement, you must exclude yourself from it by **March 4, 2022**. Unless you exclude yourself, you won't be able to sue or continue to sue Plaid for any claim made in this lawsuit or released by the Settlement Agreement. If you stay in the Settlement (i.e., don't exclude yourself), you may object to it or ask for permission for you or your lawyer to appear and speak at the Final Approval Hearing – at your own cost – but you don't have to. Objections and requests to appear are due by **March 4, 2022**. More information about these options is available at www.PlaidSettlement.com.

The Court's hearing. The Court will hold the Final Approval Hearing at **1 p.m. on May 12, 2022** in Courtroom 4 (3rd Floor) of the United States Courthouse, 1301 Clay Street, Oakland, CA 94612. At the Final Approval Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court may listen to people who appear at the hearing and who have provided notice of their intent to appear at the hearing. The Court may also consider Class Counsel's application for attorneys' fees, expenses and for Service Awards. At or after the hearing, the Court will decide whether to approve the Settlement and to approve Class Counsel's application for attorneys' fees, expenses and Service Awards.

This notice is only a summary.

For more information visit www.PlaidSettlement.com or call 855-645-1115.

Unsubscribe

United States District Court for the Northern District of California

HOME | SUBMIT A CLAIM | IMPORTANT DOCUMENTS | SEARCH FOR APP/SERVICE | FAQS | CONTACT US

Your claim must be submitted online by April 28, 2022. You may only submit one Claim Form. If you have any questions, please contact the Settlement Administrator by email at Questions@PlaidSettlement.com or by mail at *Plaid Inc. Privacy Litigation*, c/o Settlement Administrator, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

I. YOUR CONTACT INFORMATION AND MAILING ADDRESS

Provide your name and contact information below. You must notify the Settlement Administrator if your contact information changes after you submit this form.

First Name *

Last Name *

Street Address *

City *

State *

Zip Code *

Email Address *Required

Confirm Email Address *

* Required Fields

II. PAYMENT SELECTION

Please select **one** of the following payment options:

Payment Options

PayPal

No bank account required

USE PAYPAL

venmo

No bank account required

USE VENMO

DIRECT DEPOSIT

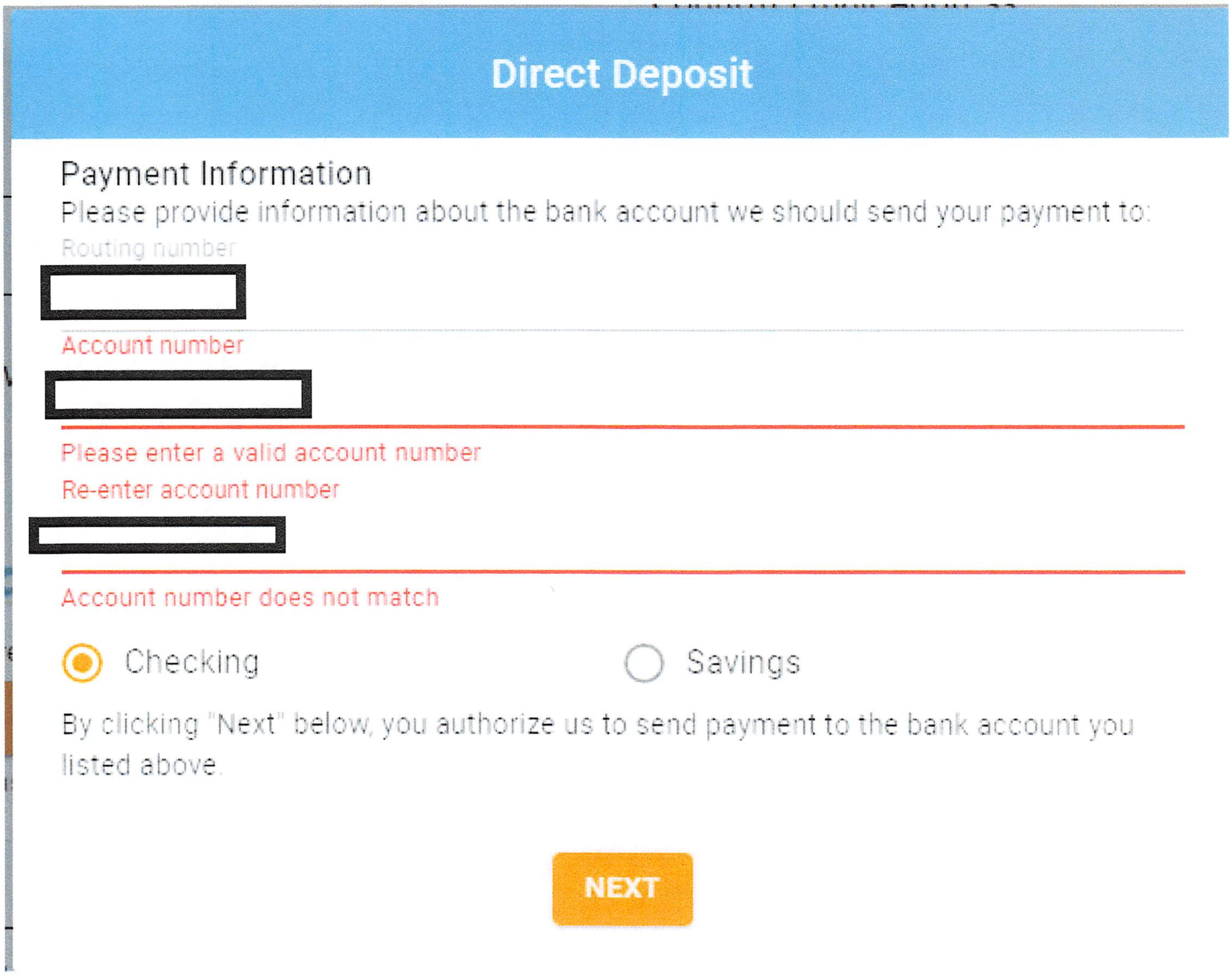
Direct to your bank account

USE DIRECT DEPOSIT

If you prefer to receive a paper check instead of a faster and more convenient option listed above, click this link

III. ATTESTATION UNDER PENALTY OF PERJURY

By signing below and submitting this Claim Form, I hereby swear under penalty of perjury that the information provided in this Claim Form is



Direct Deposit

Payment Information

Please provide information about the bank account we should send your payment to:

Routing number

[redacted]

Account number

[redacted]

Please enter a valid account number

Re-enter account number

[redacted]

Account number does not match

Checking   Savings

By clicking "Next" below, you authorize us to send payment to the bank account you listed above.

NEXT