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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY
LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

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

**DECLARATION OF MICHAEL K.
SHEEN REGARDING LIST OF
EXCLUSIONS**

1 I, Michael K. Sheen, declare as follows:

2 1. I am a member in good standing of the State Bar of California, and a partner in
3 Lieff Cabraser Heimann & Bernstein, LLP, which has been appointed by the Court to serve as
4 Co-Lead Class Counsel in this action. I make this Declaration based on my own personal
5 knowledge. If called upon to testify, I could and would testify competently to the truth of the
6 matters stated herein.

7 2. Pursuant to the Court's Order on Motion for Preliminary Approval of Class Action
8 Settlement, the deadline to submit a request for exclusion from the Class was March 4, 2022. *See*
9 Dkt. 153 ("Preliminary Approval Order") at 34, ¶7.

10 3. Angeion Group, LLC ("Angeion"), the Court-appointed Settlement Administrator,
11 has received approximately 1,785 requests for exclusion.¹ A summary chart listing the requests
12 for exclusion received to date is attached hereto as **Exhibit A**.

13 4. I understand that Angeion continues to receive requests for exclusions by mail,
14 including requests that appear to be postmarked on or before the March 4, 2022 deadline.

15 5. Angeion is currently conducting an audit to confirm the validity of the exclusions
16 it has received. Class Counsel will provide a further update on the results of that audit in advance
17 of the final approval hearing on May 12, 2022.

18 I declare under penalty of perjury that the foregoing is true and correct to the best of my
19 knowledge, and that this Declaration was signed in Berkeley, California, on March 18, 2022.

20 /s/ Michael K. Sheen

21 MICHAEL K. SHEEN

22
23
24 ¹ The Preliminary Approval Order states that "[a]ny request for exclusion by a Class Member
25 must be postmarked or submitted electronically on the settlement website by March 4, 2022 and
26 in compliance with the terms of the Settlement Agreement." Dkt. 153 at 34, ¶ 7. Pursuant to the
27 Agreement, requests for exclusion were required to include (i) the name and case number of this
28 lawsuit; (ii) the Class Member's full name; (iii) the Class Member's mailing address, e-mail
address, or telephone number; (iv) the words "Notification of Exclusion" or a statement that
he/she wants to be excluded from the Settlement; and (v) a handwritten or electronically imaged
written signature. *See* Dkt. 138, Ex. A (Settlement Agreement) ¶ 94 (Long-Form Notice
incorporated by reference into the Agreement); Dkt. 159, Ex. J (Long-Form Notice) at 13–14
(listing information that must be included in a valid request for exclusion).