

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MIKE SHAFER, DAVID KEATING, and
WILLIAM JEFFREY IGOE, on Behalf of
Themselves and All Others Similarly Situated,

Plaintiffs,

v.

GLOBAL PAYMENTS INC., ACTIVE
NETWORK LLC, JEFF SLOAN, CAMERON
BREADY, PAUL TODD, JOSH WHIPPLE, and
ANDREA FACINI,

Defendants.

Case No. 1:23-cv-00577-LMM

CLASS ACTION

**DECLARATION OF KATHLEEN BRAUNS IN SUPPORT OF
CO-LEAD PLAINTIFFS' UNOPPOSED MOTION
FOR DISTRIBUTION OF THE NET SETTLEMENT FUND**

I, KATHLEEN BRAUNS, declare as follows:

1. I am a Project Manager of A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data"), whose Corporate Office is located in Milwaukee, Wisconsin. I am over 21 years of age and am not a party to the above-captioned action (the "Action").¹ The following statements are based on my personal knowledge and information provided by other A.B. Data employees working under my supervision, and if called on to do so, I could and would testify competently thereto.

¹ Unless otherwise defined in this Declaration, all capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement, dated June 10, 2024 (ECF No. 65-2, the "Stipulation").

2. Pursuant to its Order Preliminarily Approving Settlement and Providing for Class Notice (ECF No. 67, the “Preliminary Approval Order”), the Court approved the retention of A.B. Data as the Claims Administrator for the above-captioned action. Since that time, A.B. Data has, among other things: (a) caused the Postcard Notice to be mailed to potential Settlement Class Members, brokers, and other nominees; (b) created and maintained a toll-free helpline, 877-411-4706, for inquiries during the course of the administration; (c) designed, launched, and maintained a case-specific website (www.GlobalPaymentsSecuritiesLitigation.com, the “Settlement Website”), which includes the option to submit a Proof of Claim and Release Form (“Claim Form” or “Claim”) online and provides access to copies of the Stipulation, Preliminary Approval Order, the Notice, and Claim Form; (d) caused the Summary Notice to be published; (e) provided, upon request, additional copies of the Notice to brokers, nominees, and potential Settlement Class Members; and (f) received and processed Claim Forms.

3. A.B. Data has completed processing all 291,830 Claim Forms received through March 25, 2026, in accordance with the terms of the Stipulation and the Court-approved Plan of Allocation set forth in the Notice and hereby submits its administrative determinations accepting and rejecting Claims in preparation for a distribution of the Net Settlement Fund to Authorized Claimants. A.B. Data also presents this Declaration in support of Lead Plaintiffs’ Motion for Distribution of Class Settlement Funds.

I. DISSEMINATION OF NOTICE

4. As more fully described in the Declaration of Kathleen Brauns Regarding Mailing of the Postcard Notice; Publication of the Summary Notice; Objections and Requests for Exclusion Received, and Claims Received to Date dated November 5, 2024 (the “Initial Brauns Declaration”) (ECF No. 70-1), and the Supplemental Declaration of Kathleen Brauns Regarding Mailing of the

Postcard Notice, Objections and Requests for Exclusion Received, and Claims Received to Date dated December 4, 2024 (the “Supplemental Brauns Declaration”) (ECF No. 71-4), A.B. Data has fully complied with the Court-approved notice plan. To date, A.B. Data has disseminated a total of 264,825 Postcard Notices to potential Settlement Class Members, brokers, and other nominees.

5. Postcard Notices that were returned by the U.S. Postal Service as undeliverable were reviewed for updated addresses and, where available, new addresses were entered into the database and new Postcard Notices were mailed to the updated addresses. Any correspondence received through the post office box was reviewed and, where necessary, appropriate responses were provided to the senders.

6. Additionally, pursuant to the Preliminary Approval Order, on September 23, 2024, A.B. Data caused the Summary Notice to be published in *Investor’s Business Daily* and transmitted over *PR Newswire*.

II. PROCEDURES FOLLOWED IN PROCESSING CLAIMS

7. Under the terms of the Preliminary Approval Order and as set forth in the Postcard Notice, each Settlement Class Member who wished to be eligible to receive a distribution from the Net Settlement Fund was required to complete and submit to A.B. Data a properly executed Claim Form postmarked no later than January 11, 2025, together with adequate supporting documentation for the transactions and holdings reported therein. Through March 25, 2026, A.B. Data has received and fully processed 291,830 Claims.

8. In preparation for receiving and processing Claims, A.B. Data: (a) created a unique database to store Claim details, images of Claims, and supporting documentation; (b) trained staff in the specifics of the Settlement so that Claims would be properly processed; (c) formulated a system so that telephone and email inquiries would be properly responded to; (d) developed

various computer programs and screens for entry of Settlement Class Members' identifying information, as well as their transactional information; and (e) developed a proprietary "calculation module" that would calculate Recognized Loss Amounts pursuant to the Court-approved Plan of Allocation set forth in the Notice.

9. Settlement Class Members seeking to share in the Net Settlement Fund had the option of submitting their Claims using the Settlement Website, electronically via email, or through the mail to a post office box address specifically designated for the Settlement.

A. Processing Paper Claims

10. Of the 291,830 Claims received by A.B. Data through March 25, 2026, 607 were "Paper Claims." Once received, Paper Claims were opened and prepared for scanning. This process included unfolding documents, removing staples, copying non-conforming sized documents, sorting documents, and, where Claimant identification information was not provided on the Claim Form, copying and attaching the envelope with the return address to the file. Once prepared, Paper Claims were scanned into a database developed by A.B. Data to process Claims submitted for the Settlement (the "Settlement Database") together with all submitted documentation. Subsequently, each Claim was assigned a unique claim number. Once scanned, the information from each Claim Form, including the name, address, and the Claimant's purchase/acquisition transactions, sale transactions, and holdings listed in the Claim Form, was entered into the Settlement Database. Next, the information provided by each Claimant in support of his, her, or its Claim was reviewed to determine whether each Claimant had purchased or

otherwise acquired Global Payments Inc. (“Global Payments”) common stock during the Class Period, as required to be a Settlement Class Member.

11. In order to process the transactions detailed in the Claims, A.B. Data utilized internal codes to identify and classify Claims and any deficiency or ineligibility conditions that existed within those Claims. The appropriate codes were assigned to the Claims as they were processed. For example, where a Claim was submitted by a Claimant who did not purchase or otherwise acquire Global Payments common stock during the Class Period, that Claim received a “Claim level” code that denoted ineligibility. Similar “Claim level” codes were used to denote other ineligible conditions, such as duplicate Claims. These codes indicated to A.B. Data that the Claimant is not eligible to receive any payment from the Net Settlement Fund with respect to that Claim unless the deficiency is cured.

12. Because a Claim may be deficient only in part, but otherwise acceptable, A.B. Data also utilized codes that only applied to specific transactions within a Claim. For example, if a Claimant submitted a Claim with supporting documentation for all but one purchase transaction, that one transaction received a “transaction level” code. That code indicated that one transaction was deficient, but that the Claim was otherwise eligible for payment if other transactions in the Claim calculated to a Recognized Claim pursuant to the Court-approved Plan of Allocation. Thus, even if the transaction level deficiency was never cured, the Claim could still be paid in part.

B. Processing of Web Claims

13. Of the 291,830 Claims received by A.B. Data through March 25, 2026, 2,037 were submitted by Claimants via the Claim Portal on the Settlement Website (“Web Claims”). Once received, Web Claims were imported into the Settlement Database. This process included assigning a unique Claim number to each Web Claim and mapping the submission form to the

database so that entries could be evaluated and calculated according to the Plan of Allocation. Next, and identical to the process utilized for Paper Claims, the information provided by each Claimant in support of his, her, or its Web Claim was reviewed to determine whether the Claimant purchased or otherwise acquired Global Payments common stock during the Class Period, as required to be a Settlement Class Member. A.B. Data utilized the same internal Claim codes to identify and classify Web Claims, so the appropriate codes were assigned to the Web Claims as they were processed.

C. Processing Claims Submitted Electronically

14. Of the 291,830 Claims received by A.B. Data through March 25, 2026, 289,186 were filed electronically (“Electronic Claims”). Electronic Claims are typically submitted by institutional investors who may have hundreds or thousands of transactions during the relevant period. Rather than provide reams of paper requiring data entry, the institutional investors filing Electronic Claims either mail a computer disc or email a file to A.B. Data, so that A.B. Data may electronically upload all transactions to the Settlement Database.

15. A.B. Data maintains an electronic filing operations team (the “Electronic Filing Team”) to coordinate and supervise the receipt and handling of all Electronic Claims. In this case, as in all other claims administrations, the Electronic Filing Team reviewed and analyzed each electronic file to ensure that it was formatted in accordance with A.B. Data’s required format, and to identify any potential data issues or inconsistencies within the file. If any issues or inconsistencies arose, A.B. Data immediately notified the filer. If the electronic file was deemed to be in an acceptable format, it was then forwarded to A.B. Data’s data team with detailed loading instructions including the number of Claims and transaction totals that the institution provided when it sent the electronic file.

16. Once the electronic file was loaded, A.B. Data's Quality Assurance personnel reviewed the electronic file to confirm that the number of Claims and transactions matched the information provided by the filer.

17. Once the Claims and transaction totals were confirmed, the Electronic Claims were coded just like Paper Claims with messages to identify and classify Electronic Claims and any deficiency or ineligibility conditions that existed within them. The codes applied to the Electronic Claims are the same as those applied to Paper Claims; however, the process in applying the codes to the Electronic Claims differs from the process used for Paper Claims. Rather than manually applying codes, the Electronic Filing Team performed programmatic reviews on Electronic Claims to identify deficient and ineligible conditions (such as, but not limited to, price per share validation issues and out of balance conditions). The appropriate codes were then assigned programmatically once the output of the reviews was thoroughly analyzed and confirmed as accurate.

18. The review process also included flagging any Electronic Claims that were not accompanied by the following: (a) a signed Claim Form, which serves as a "Master Proof of Claim Form" for all accounts referenced on the electronic file submitted; (b) an electronic filing summary sheet; (c) supporting documentation, such as a signed or notarized letter on company letterhead attesting to the truth and accuracy of the data on the electronic file, trade confirmations, and/or brokerage account statements; (d) a notarized affidavit, corporate resolution, or corporate bylaws verifying that the individual who executed the Claim Form and submitted the electronic file is an authorized signatory of his/her company with the authority to file such information; and (e) documentation to demonstrate the authority to file on behalf of the Claimant. This portion of the review process was also reviewed by A.B. Data's Quality Assurance personnel, who worked in conjunction with the Electronic Filing Team to contact the institutional filers whose electronic files

were missing information. This process ensures that only fully completed Claims, submitted by properly authorized representatives of the Claimants, are considered eligible for payment from the Net Settlement Fund.

19. At the end of the process, A.B. Data performed various audits of Electronic Claims. Specifically, A.B. Data contacted a number of electronic filers who, in lieu of providing specific trade confirmations, provided certain other forms of supporting documentation as set forth in ¶18 above, and requested that various sample transactions selected by A.B. Data be documented by providing confirmation slips or other transaction-specific supporting documentation. This random sampling and request for follow-up verification help to ensure that electronic data supplied by Claimants did not contain inaccurate information. A.B. Data performed this final check on a variety of electronic files randomly selected, as well as on the electronic files with the largest Recognized Losses.

III. EXCLUDED PERSONS

20. A.B. Data also reviewed all Claims to ensure that they were not submitted by, or on behalf of, persons or entities excluded from the Settlement Class by definition, to the extent that the identities of such persons or entities were known to A.B. Data through the list of Defendants and other excluded persons and entities set forth in the Stipulation and the Notice.

IV. THE DEFICIENCY PROCESS

A. Paper and Web Claims

21. A significant number of Paper and Web Claims submitted were incomplete or had one or more defects or conditions of ineligibility, such as the Claim not being signed, not being

properly documented, or not indicating a transaction in Global Payments common stock during the Class Period.

22. The majority of A.B. Data's efforts in handling a claims administration involve Claimant communications, so that all Claimants have sufficient opportunity to cure any deficiencies and file a complete Claim. The "Deficiency Process," which primarily involved mailing or emailing letters to Claimants and, in response, making and receiving calls and sending and receiving emails to and from Claimants, was intended to assist Claimants in properly completing their otherwise deficient submissions so that they would be eligible to receive a distribution from the Net Settlement Fund.

23. If a Claim was determined to be defective or ineligible, a *Notice of Rejection of Claim* or a *Notice of Partial Rejection of Claim* ("Deficiency Notices") was sent to the Claimant describing the defect(s) or condition(s) of ineligibility in their Claim and what was necessary to cure any "curable" defect(s) in the Claim. The Deficiency Notices advised the Claimants that the submission of the appropriate information and/or documentary evidence to complete the Claim had to be sent within twenty (20) days from the date of the letter, or the Claim would be recommended for rejection to the extent the deficiency or condition of ineligibility was not cured. The Deficiency Notices also advised Claimants that if they desired to contest the administrative determination, they were required to submit a written statement to A.B. Data requesting Court review of the determination and setting forth the basis for the request. Attached hereto as Exhibit A is an example of the Deficiency Notice.

24. Claimants' responses to the Deficiency Notices were scanned into A.B. Data's database and associated with the corresponding Claim. The responses were then carefully reviewed

and evaluated by A.B. Data's team of processors. If a Claimant's response corrected the defect(s), A.B. Data updated the database manually to reflect the change in status of the Claim.

B. Electronic Claims

25. In addition, for Electronic Claims, A.B. Data used the following process to contact the banks, brokers, nominees, and other filers who submitted their data electronically to confirm receipt of their submissions and to notify the filers of any deficiencies or Claims that were ineligible. These filers were each sent an email to the email address included with their Claim Form ("Status Email") with an attached Excel spreadsheet containing detailed information associated with the accounts and indicating which of those accounts within the filing were deficient and/or rejected ("Status Spreadsheet").

26. Each Status Email sent to the email address of record provided with the Claim contained the following information:

- a. Notification to the filer that any Claims with deficiencies not corrected within twenty (20) days from the date of the email may be rejected;
- b. Notification to the filer of his, her, or its right to contest the rejection of the Claim(s) and request this Court's review of A.B. Data's administrative determination within twenty (20) days from the date of the Status Email; and
- c. Instructions for how to submit corrections.

27. The Status Spreadsheet attached to the Status Email contained the following information:

- a. A listing of all accounts associated with the filing with unique identification numbers;
- b. Identification of the individual accounts that were found to be deficient or ineligible;
- c. The current status of the account in A.B. Data's database; and
- d. The current Recognized Claim calculation associated with the account.

28. Samples of the Status Email and the Status Spreadsheet are attached hereto as Exhibits B and C, respectively.

29. The E-Claim Filers' responses were reviewed by A.B. Data's Electronic Claims Filing ("ECF") Team, were scanned and/or loaded into A.B. Data's database, and were associated with the corresponding Electronic Claims. If a response corrected the defect(s) or affected an Electronic Claim's status, A.B. Data manually and/or programmatically updated the database to reflect the changes in status of the Electronic Claim.

V. DISPUTED CLAIMS

30. As noted above, Claimants were advised that they had the right to contest A.B. Data's administrative determination of deficiencies or ineligibility within twenty (20) days from the date of notification and that they could request that the dispute be submitted to the Court for review. More specifically, such persons were advised in the Deficiency Notice and in the Status Emails that to dispute A.B. Data's determinations, they needed to provide a statement of reasons

indicating their grounds for contesting the rejection, along with supporting documentation. To date, A.B. Data has not received any requests for Court review.

VI. LATE BUT OTHERWISE ELIGIBLE CLAIMS

31. Through March 25, 2026, A.B. Data received 9,703 Claims that were submitted after the January 11, 2025, claims deadline established by the Court. A.B. Data processed all late Claims received through March 25, 2026, and 1,707 have been found to be otherwise eligible in whole or in part (the “Late But Otherwise Eligible Claims”). A.B. Data has not rejected any Claims received through March 25, 2026, solely based on their late submission, and believes no delay has resulted from the provisional acceptance of these Late But Otherwise Eligible Claims. To the extent they are eligible but for the fact that they were late, A.B. Data recommends that they be eligible for payment.

32. However, there must be a final cut-off date after which no more Claims will be accepted so that there may be a proportional distribution of the Net Settlement Fund and the distribution may be accomplished. Acceptance of additional Claims or responses to Deficiency Notices received during the finalization of the administration and the preparation of this application would necessarily require a delay in the distribution. Accordingly, A.B. Data requests that no Claims or responses to Deficiency Notices received after March 25, 2026, shall be eligible for payment in the initial distribution.

VII. QUALITY ASSURANCE

33. An integral part of all of A.B. Data’s settlement administration projects is its Quality Assurance review. A.B. Data’s Quality Assurance personnel worked throughout the entire administration to verify that Claims were processed properly; that deficiency and ineligibility

codes were properly applied to Claims; that Deficiency Notices were mailed to the appropriate Claimants; and that A.B. Data's computer programs were operating properly.

34. Once all of the Claims were processed, Deficiency Notices were mailed, and responses to those notices were reviewed and processed, A.B. Data's Quality Assurance team performed a final project wrap up to ensure the correctness and completeness of all Claims before A.B. Data prepared its final reports to Co-Lead Counsel. Here, in connection with this Quality Assurance wrap up, A.B. Data: (a) confirmed that valid Claims have no messages denoting ineligibility; (b) confirmed that Claims that are ineligible have messages denoting ineligibility; (c) confirmed that Claims that did not include purchases or acquisitions of Global Payments common stock during the Class Period contain appropriate ineligibility messages; (d) confirmed that Claim detail (transaction) messages appear only on Claim detail records; (e) confirmed that all Claims requiring Deficiency Notices were sent such notices; (f) performed a sample review of deficient Claims; (g) reviewed Claims with large dollar losses; (h) sampled Claims that had been determined to be ineligible, including those with no calculated Recognized Claim under the Plan of Allocation, in order to verify that all transactions had been captured correctly; and (i) tested the accuracy of the calculation program.

35. In support of the work described above, A.B. Data's computer staff designed and implemented, and the Quality Assurance team tested, the following programs for this administration: (a) data entry screens that store Claim information (including all transactional data included in each Claim) and attach codes and, where necessary, text to denote conditions existing within the Claim; (b) programs to load and analyze transactional data submitted electronically for all Electronic Claims; (c) a program to compare the claimed transaction prices against the reported market prices to confirm that the claimed transactions were within an acceptable range of the

reported market prices; (d) a calculation program to analyze the transactional data for all Claims and calculate each Claimant's Recognized Claim based on the Plan of Allocation; and (e) programs to generate various reports throughout and at the conclusion of the administration, including lists of all eligible and ineligible Claims.

36. A.B. Data also used a variety of fraud protection controls throughout the administration to identify potential fraudulent Claims. Searches for duplicate Claims (by beneficial owner name, Tax Identification Number, account number, and Recognized Claim amounts), high value reviews, spot reviews, and other standard audit reports that examined the information in a variety of ways were used during A.B. Data's Quality Assurance review.

37. As part of its due diligence in processing Claims, A.B. Data conducted a search of all Claims filed in the Settlement using the database it maintains of known questionable claim filers. This database contains names, addresses, and aliases of individuals or entities that have been investigated by government agencies for questionable claim filings, as well as the names and contact information compiled from previous settlements that A.B. Data has administered where fraudulent claims were received. A.B. Data updates the database on a regular basis. The database for the Settlement was searched for all individuals identified as questionable claim filers. A.B. Data performed searches based on name, aliases, address, and city/ZIP code. In addition, all of A.B. Data's claim processors are trained to identify any potentially inauthentic documentation when processing claims, including claims submitted by claimants not previously captured in our database as previously identified questionable claim filers. Processors are instructed to flag Claims as "Questionable Claims" and route them to management for review. To date, A.B. Data has identified two (2) Claims submitted by a questionable claim filers.

38. In accordance with the Office of Foreign Asset Control, known as OFAC, A.B. Data will perform searches on every check that it will issue to identify any potential payees whose names appear on the federal government's restricted persons list or who reside in countries to which payments are prohibited. A.B. Data regularly monitors changes to OFAC regulations and guidelines.

VIII. DISPOSITION OF CLAIMS

39. A.B. Data has completed the processing of the 291,830 Claims that were received through March 25, 2026 and has determined that (a) 109,460 are acceptable in whole or in part, and that (b) 182,370 should be wholly rejected because they are ineligible for recovery from the Net Settlement Fund. The 182,370 wholly rejected Claims are ineligible for the following reasons:

- a. 145,692 Claims did not result in a Recognized Claim under the Court-approved Plan of Allocation;
- b. 32,531 Claims had no purchase(s) or acquisitions of Global Payments common stock securities during the Class Period;
- c. 3,479 Claims were duplicates or replaced;
- d. 652 Claims were withdrawn;
- e. 14 Claims were filed by or on behalf of an Excluded Party; and
- f. 2 Claims were filed by a Questionable Claim Filer.

40. A list of the Claims submitted, and their ultimate disposition, are attached hereto as Exhibits D through F. Exhibit D, entitled "Timely Eligible Claims," lists all timely filed, provisionally accepted Claims and states each Claim's Recognized Claim. Exhibit E, entitled "Late But Otherwise Eligible Claims," lists all late filed (*i.e.*, Claims with a postmark date or which were received after January 11, 2025, but on or before March 25, 2026), provisionally accepted Claims and states each Claim's Recognized Claim. Exhibit F, entitled "Rejected Claims," lists all wholly rejected Claims and states the reason for each Claim's rejection. For privacy reasons, Exhibits D

through F provide only the Claimant's unique Claim number assigned by A.B. Data, along with that Claim's Recognized Claim or reason for rejection (no names, addresses, or Social Security or other Taxpayer Identification Numbers are disclosed).

41. The total Recognized Claims for all provisionally accepted Claims (as set forth in Exhibits D and E hereto) calculated in accordance with the Court-approved Plan of Allocation is \$137,119,218.96 (the total Recognized Claims for the 107,753 Timely Eligible Claims is \$135,192,937.95 and the total Recognized Claims for the 1,707 Late But Otherwise Eligible Claims is \$1,926,281.01). According to the Plan of Allocation, each Authorized Claimant shall be allocated a *pro rata* share of the Net Settlement Fund based on the percentage that his, her, or its Recognized Claim bears to the total of the Recognized Claims of all Authorized Claimants; however, as set forth in the Court-approved Plan of Allocation, if an Authorized Claimant's prorated payment calculates to less than \$10.00, it will not be included in the calculation and no distribution will be made to such Authorized Claimant.

IX. A.B. DATA'S REQUESTED FEES AND DISBURSEMENTS

42. A.B. Data agreed to be the Claims Administrator in exchange for payment of its fees and out-of-pocket expenses. Co-Lead Counsel received reports on all of the work A.B. Data performed with respect to the administration of the Settlement and authorized the claims administration work performed herein. Attached hereto as Exhibit G are copies of A.B. Data's invoices for its work performed on behalf of the Class. As set forth on these invoices, the cost of administration through the Initial Distribution is \$554,898.27 in fees and expenses. This is greater than the expected cost of administration due to increased expenses in the form of invoices received from nominees in connection with their identification of, and their forwarding of Postcard Notices to, potential Settlement Class Members among their clients. Pursuant to the Preliminary Approval

Order, nominees “who purchased or otherwise acquired Global Payments common stock during the Class Period for the benefit of another person or entity” were directed to, upon receipt of the Notice, request from A.B. Data sufficient copies of the Postcard Notice to forward to all such beneficial owners and thereafter forward such Postcard Notices (or provide a list, with addresses, of such beneficial owners to A.B. Data), and thereafter “may seek reimbursement of their reasonable expenses actually incurred in complying with this Order by providing the Claims Administrator with proper documentation supporting the expenses for which reimbursement is sought.” Preliminary Approval Order ¶6. Pursuant to the Preliminary Approval Order, “[s]uch properly documented expenses incurred by nominees in compliance with the terms of this Order shall be paid from the Settlement Fund.” *Id.* Brokers requested a greater number of copies of the Postcard Notice than anticipated, leading to requests from such brokers for greater reimbursement of their reasonable expenses incurred in complying with the Preliminary Approval Order. To date, A.B. Data has received payment of fees and expenses in the amount of \$536,974.86. Therefore, the total amount of A.B. Data’s requested fees and expenses from the Settlement Fund is \$17,923.41.²

X. DISTRIBUTION PLAN FOR THE NET SETTLEMENT FUND

43. Should the Court concur with A.B. Data’s determinations concerning the provisionally accepted and rejected Claims, including the Late but Otherwise Eligible Claims, A.B. Data respectfully recommends the following distribution plan (the “Distribution Plan”):

- a. A.B. Data will conduct an initial distribution (the “Initial Distribution”) of the available balance of the Net Settlement Fund, after deducting all

² If the estimate of fees and expenses to conduct the Initial Distribution is greater than the actual cost to conduct the distribution, the excess will be returned to the Net Settlement Fund.

payments previously approved by the Court and requested herein, and after deducting payment of any estimated taxes, the costs of preparing tax returns, and any escrow fees, as follows:

- i. Pursuant to the Court-approved Plan of Allocation, A.B. Data will calculate each Authorized Claimant's *pro rata* share of the Net Settlement Fund based on the amount of the Authorized Claimant's Recognized Claim in comparison to the total Recognized Claims of all Authorized Claimants.
- ii. A.B. Data will, pursuant to the Court-approved Plan of Allocation, eliminate from the distribution any Authorized Claimant whose *pro rata* share of the Net Settlement Fund as calculated under subparagraph (a)(i) above is less than \$10.00. Such Claimants will not receive any payment from the Net Settlement Fund.
- iii. After eliminating Claimants who would have received less than \$10.00, A.B. Data will recalculate the *pro rata* share of the Net Settlement Fund for Authorized Claimants who would have received \$10.00 or more pursuant to the calculation described in subparagraph (a)(i) above. This *pro rata* share is the Authorized Claimant's "Distribution Amount."
- iv. To encourage Authorized Claimants to cash their distribution checks promptly, and to avoid or reduce future expenses relating to unpaid distribution checks, all Initial Distribution checks will bear the notation: "DEPOSIT PROMPTLY, VOID AND SUBJECT TO RE-

DISTRIBUTION IF NOT NEGOTIATED WITHIN 120 DAYS OF DISTRIBUTION.³

- v. Authorized Claimants who do not cash their Initial Distribution checks within the time allotted, or pursuant to further action as set forth in footnote 2, will irrevocably forfeit all recovery from the Settlement.

- b. Consistent with the Court-approved Plan of Allocation, if any funds remain in the Net Settlement Fund after the distribution because of uncashed checks or otherwise, then, after A.B. Data has made reasonable and diligent efforts to have Authorized Claimants cash their distribution checks (which efforts shall consist of the extensive follow up efforts described in footnote 2), any balance remaining in the Net Settlement Fund six (6) months after the distribution, or as reasonably soon thereafter, shall be used in the following fashion: (a) first, be used to pay any amounts mistakenly omitted from the initial disbursement (b) second, be used to pay any additional settlement

³ In an effort to have as many Authorized Claimants as possible cash their checks, A.B. Data will perform follow up with those Authorized Claimants whose checks are initially uncashed, either because they are returned to A.B. Data as undeliverable or because the Authorized Claimant simply did not cash the check after a period of time elapses (the “Outreach Program”). For Authorized Claimants whose checks are returned as undeliverable, A.B. Data will endeavor to locate new addresses by running the undeliverable addresses through the U.S.P.S. National Change of Address database and, where appropriate, via Internet search techniques and by calling the Authorized Claimants. Where a new address is located, A.B. Data will update the database accordingly and re-issue a distribution check to the Authorized Claimant at the new address. For any Authorized Claimants whose checks are not returned but who simply do not cash their checks, A.B. Data will use a mix of automated calls, personalized telephone calls, and emails to urge such Authorized Claimants to cash their distribution checks. In the event an Authorized Claimant loses or damages his, her, or its check, or otherwise requires a new check, A.B. Data will issue replacement checks. Distribution reissues will be undertaken only upon written instructions from the Authorized Claimant, provided that the Authorized Claimant returns the previous check where appropriate. For all checks, A.B. Data will void the initial payment prior to reissuing a payment.

administration fees, costs, and expenses, including those of Co-Lead Counsel, or the Claims Administrator as may be approved by the Court, and (c) finally, to make a second distribution to claimants who cashed their checks from the initial distribution and who would receive at least \$10.00, after payment of the estimated costs, expenses, or fees to be incurred in administering the Net Settlement Fund and in making this second distribution, if Co-Lead Counsel, in consultation with A.B. Data, determine it to be cost effective to do so. Additional distributions shall repeat thereafter in six-month intervals, subject to the conditions previously noted, until Co-Lead Counsel, in consultation with A.B. Data, determine that further redistribution is not cost effective.

- c. At such time as Plaintiffs' Counsel, in consultation with A.B. Data, determines that the redistribution of funds remaining in the Net Settlement Fund is not cost effective, if sufficient funds remain to warrant the processing of Claims received after March 25, 2026, such Claims will be processed, and any such Claims that are otherwise valid, as well as any earlier received Claims for which an adjustment was received after March 25, 2026, which resulted in an increased Recognized Claim, will be paid in accordance with paragraph (d) below. If any funds shall remain in the Net Settlement Fund after payment of such late or late adjusted Claims, the

remaining balance shall be contributed to a certified tax-exempt organization under IRS Code Section 501(c)(3) subject to Court approval.

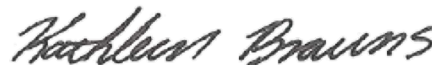
- d. No new Claims may be accepted after March 25, 2026, and no further adjustments to Claims received on or before March 25, 2026, that would result in an increased Recognized Loss may be made for any reason after March 25, 2026, subject to the following exception: If Claims are received or modified after March 25, 2026, that would be eligible for payment or additional payment under the Plan of Allocation if timely received then, at the time that Co-Lead Counsel, in consultation with A.B. Data, determine that a redistribution is not cost effective as provided in paragraph (c) above, then, after payment of any unpaid fees or expenses incurred in connection with administering the Settlement and after the payment of any estimated taxes, the costs of preparing tax returns, and any escrow fees, such Claimants, at the discretion of Plaintiffs' Counsel, may be paid their distribution amounts or additional distribution amounts on a *pro rata* basis that would bring them into parity with other Authorized Claimants who have cashed all of their prior distribution checks to the extent possible.
- e. Unless otherwise ordered by the Court, A.B. Data will dispose of the paper copies of Claims and all supporting documentation one (1) year from the final distribution date of the Net Settlement Fund and will dispose of electronic copies of the same three (3) years after the final distribution date of the Net Settlement Fund.

XI. CONCLUSION

44. A.B. Data respectfully requests that the Court enter an Order approving its administrative determinations, accepting and rejecting the Claims submitted herein and received on or before March 25, 2026 and approving the Distribution Plan. A.B. Data further respectfully requests payment of its outstanding fees and expenses, attached hereto as Exhibit G.

I declare, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct to the best of my knowledge.

Executed on March 31, 2026.



Kathleen Brauns