

COURTESY COPY

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MASHAYILA SAYERS, BRITTNEY TINKER,
JENNIFER MONACHINO, KIMBERLY
MULLINS, HILDA MICHELLE MURPHREE,
and AMANDA JIMENEZ, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

ARTSANA USA, INC.,

Defendant.

Case No. 7:21-cv-07933-VB

Hon. Vincent L. Briccetti

**DECLARATION OF JEREMY S. SMITH IN SUPPORT OF ARTSANA USA, INC.'S
OPPOSITION TO PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

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

1. I am an attorney licensed to practice law in the State of California. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Defendant Artsana USA, Inc. I make this declaration in support of Artsana's Opposition to Plaintiffs' Motion for Final Approval of Class Action Settlement. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. During lengthy negotiations before the claims period commenced in March 2023, the parties and Angeion discussed how "no-proof" claimants could provide the information required to verify their claims.

3. Angeion proposed the following four-quadrant matrix:

Please complete at least TWO (2) of the 4 Groups (A-D) to continue.

<p style="text-align: center;">GROUP A</p> <p>A1. What is the model of the Eligible Product you purchased between April 22, 2015 and December 31, 2021? Please select one.</p> <p style="text-align: center;"><input type="text" value="--Select--"/></p> <p>A2. What is the PRIMARY and/or SECONDARY color of the seat covers? Please select up to two.</p> <p style="text-align: center;"> <input type="text" value="--Select--"/> <input type="text" value="--Select--"/> </p>	<p style="text-align: center;">GROUP B</p> <p>B1. Please type in the name of the RETAIL STORE or WEBSITE where the Eligible Product was purchased.</p> <p style="text-align: center;"><input type="text"/></p> <p>B2. What is the approximate month or season and year of purchase of the Eligible Product?</p> <p style="text-align: center;"><input type="text" value="e.g. Fall 2018 or 09/2018"/></p>
<p style="text-align: center;">GROUP C</p> <p>C1. Please fill in the SERIAL NUMBER of the Eligible Product below. The serial number is printed on the registration card or can be found on a white label sticker on the back of the booster seat.</p> <p style="text-align: center;"><input type="text"/></p>	<p style="text-align: center;">GROUP D</p> <p>D1. If not purchased online, please provide the State and municipality (city or town) of purchase and a photo of the product.</p> <p style="text-align: center;"><input type="text" value="Select State"/></p> <p>D2. Please type in the city or metropolitan area where you made the purchase of the Eligible Product.</p> <p style="text-align: center;"><input type="text"/></p> <p>D3. Please also upload a photo of the product (Accepted file types are: PDF, TIF, JPG, GIF, PNG. <i>Other file types will be rejected.</i>)</p> <p>Please confirm in the grid below that your file has been successfully uploaded.</p> <p>Select File for Upload:</p> <p style="text-align: center;"> <input type="button" value="Choose File"/> <input type="button" value="No file chosen"/> </p>

www.artsanaboosterseatsettlement.com/submit-claim

4. “Group A” required the product model and colors; “Group B” required the retail store or website and approximate date of purchase; “Group C” required the serial number; and “Group D” required a photo and place of purchase.

5. Artsana expressed its concern to Plaintiffs and Angeion that this matrix presented a low barrier for claimants. In particular, it appeared vulnerable to attempts to defraud the claims process by randomly picking a model and color from the settlement website’s dropdown list and guessing a large retailer.

6. Artsana preferred a process by which no-proof claimants would first be directed to a screen asking for the booster seat serial number, with the other options on individual screens thereafter. Artsana offered to make a valid serial number alone sufficient for a \$25 no-proof claim.

7. On March 24, 2023 Angeion informed the parties that as of March 22, more than 90% of claimants were selecting the model-year-color-retailer option (“Group A” plus “Group B”), and more than 50% of claimants were inputting incorrect information and/or showing signs of fraud. Attached as **Exhibit A** is a true and correct copy of Angeion’s March 24, 2023 email to the parties’ counsel.

8. On May 15, 2023 Angeion provided updated claims information to the parties and more than 71% of claimants were inputting incorrect information. Attached as **Exhibit B** is a true and correct copy of Angeion’s May 15, 2023 email to the parties’ counsel.

9. Throughout these early weeks of the claims period and in light of the claims figures, Artsana repeatedly told Plaintiffs’ counsel that the evident fraud could derail the settlement and pressed for meaningful changes to the claims process. Plaintiffs’ counsel delayed agreeing to any adjustments and ultimately agreed only to a reshuffling of the claim matrix’s

order in exchange for an agreement that a valid serial number would qualify the claimant for a \$25 award.

10. Before the opening of the claims period, Angeion conducted a statistical analysis applying the “specific conditions” of the Artsana settlement and determined with a “confidence interval of 99%, there is an upper bounds of liability of \$1.5 [million].” Attached as **Exhibit C** is a true and correct copy of Angeion’s March 2, 2023 email to Artsana’s counsel.

11. Angeion preliminarily reviewed 957,132 claims submitted up to July 21, 2023, claiming a total of 1,012,624 products purchased. ECF No. 60 ¶ 27. Angeion identified 153,244 preliminarily eligible products. *Id.* On August 14, 2023, Angeion informed the parties in August that the 153,244 figure includes nearly 11,000 claimants who claimed to have purchased four eligible products, over 2,000 claimants who claimed six products, and over 3,000 claimants who claimed nine products. Angeion recommended “implementing a deficiency process” and invited the parties to provide their “own thoughts as to the contours of the process.” Attached as **Exhibit D** is a true and correct copy of Angeion’s August 14, 2023 email to the parties’ counsel.

12. Attached as **Exhibit E** is a true and correct copy of the article from Thekrazycouponlady.com, “Easily Get \$25 - \$50 in the Chicco Booster Seat Settlement,” (Mar. 15, 2023), <https://thekrazycouponlady.com/tips/money/chicco-booster-seat-settlement>.

13. Attached as **Exhibit F** is a true and correct copy of the article from Sweepstakesbible.com, “Open Class Action Settlements with No Proof of Purchase 2023” (Mar. 17, 2023), <https://www.sweepstakesbible.com/blog/settlement/open-class-action-settlements-with-no-proof-of-purchase/>.

14. Attached as **Exhibit G** is a true and correct copy of the article from freebfinder.com, “Car Seat Class Action Settlement, Claim \$25 with No Receipts (\$50 with!)”

(Aug. 20, 2023), <https://www.freebfinder.com/car-seat-class-action-settlement-claim-25-with-no-receipts-50-with/>.

15. Attached as **Exhibit H** is a true and correct copy of a tweet posted by Jamie M. Timbre on March 11, 2023 regarding the Artsana settlement, available at <https://twitter.com/jtimbre/status/1634726470848245760>. The snapshot from the social media analysis tool Brandwatch (attached as **Exhibit I**) indicates that Timbre's post was retweeted 52 times, which resulted in a total of 216,000 impressions, which tracks views, not clicks.

16. Attached as **Exhibit J** is a true and correct copy of an article written by Bonnie Eslinger and posted on Law360 on September 7, 2023, titled "Facebook Jurist 'Blown Away' By Record Reply To \$725M Deal, available at <https://www.law360.com/articles/1719282/facebook-jurist-blown-away-by-record-reply-to-725m-deal>.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and that this Declaration was executed on September 25, 2023 in Los Angeles, California.



Jeremy S. Smith

Exhibit A

From: Jenny Shawver <jshawver@angeiongroup.com>
Sent: Friday, March 24, 2023 9:45 AM
To: Antonio Vozzolo; Martha Geer; Rubin, Daniel M.; Jonathan Cohen; Smith, Jeremy S.
Cc: ltfisher@bursor.com; Greg Coleman; Andrea Clisura; aleslie@bursor.com; Katharine Batchelor; Steven Weisbrot; Lacey Rose
Subject: RE: Jimenez v Artsana USA Claim Status Update

[WARNING: External Email]

Dear Counsel,

To give the parties time to ingest our early findings and determine if they are satisfied with the claims filing workflow, we have completed an initial analysis based on claims filed specifically in the A/B option group (and received as of 3/22/2023 at 12:00 p.m.). As seen in the previously circulated data, claimants are heavily utilizing the A/B option. So this analysis evaluates whether the A/B claims had accurate descriptions of model, year the product was sold, and at least one of the colors (either Primary or Secondary).

Check	Count
Matches: Correct Model, Year, and At Least One Color Combination	10,935
Does Not Match: Model, Year and At Least One Color Combination	13,223
Legacy Grouping Analysis (likely fraud)	201
Bot Pattern (likely fraud)	64
Inconsistent Location Pattern (likely fraud)	280
Total	24,703

If you have any questions, please let us know.

Best,
 Jenny

Jenny Shawver
Senior Project Manager
 Angeion Group
 1650 Arch Street, Suite 2210
 Philadelphia, PA 19103
 (215) 563-4116 (Office)
 (267) 996-3847 (Direct)
 (215) 525-0209 (Fax)
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From: Jenny Shawver

Sent: Wednesday, March 15, 2023 1:01 PM

To: Antonio Vozzolo <avozzolo@vozzolo.com>; Martha Geer <mgeer@milberg.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Jonathan Cohen <jcohen@milberg.com>; Smith, Jeremy S. <JSSmith@gibsondunn.com>
Cc: ltfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>; Andrea Clisura <AClisura@vozzolo.com>; aleslie@bursor.com; Katharine Batchelor <KBatchelor@milberg.com>; Steven Weisbrot <steve@angeiongroup.com>; Lacey Rose <LRose@angeiongroup.com>

Subject: Jimenez v Artsana USA Claim Status Update

Hi All,

Hope everyone is doing well today. We wanted to share with you some initial stats on the claims received thus far.

Breakdown of claims filed by dollar option (distinct claims, excluding quantity of products claimed):

\$50	593
\$25	8,908
Both	39
Neither (Login Claims)	3,590

Breakdown of the selections made within the \$25 option (numbers are higher since people can claim multiple products):

AB	11,624
ABC	471
ABCD	107
ABD	76
AC	106
ACD	6
AD	24
BC	28
BCD	2
BD	11
CD	19

Total products claimed is approximately 17,000 so far. This is raw data so would need further analysis to confirm a hard number.

If you have any questions, please don't hesitate to reach out.

Best,
 Jenny

Jenny Shawver
 Senior Project Manager

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Exhibit B

From: Jenny Shawver <jshawver@angeiongroup.com>
Sent: Monday, May 15, 2023 1:52 PM
To: Antonio Vozzolo; Martha Geer; Smith, Jeremy S.; Chorba, Christopher; Itfisher@bursor.com; Greg Coleman; Andrea Clisura; aleslie@bursor.com; Katharine Batchelor; Jonathan Cohen; Rubin, Daniel M.
Cc: Lacey Rose; Steven Weisbrot
Subject: RE: [External] RE: Jimenez v Artsana USA Claim Status Update

Follow Up Flag: Follow up
Flag Status: Flagged

[WARNING: External Email]

Dear Counsel,

Hope everyone had a pleasant weekend. Per your request, here is the current stats requested:

Check as of May 15	Count
Matches: Correct Model, Year and At Least One-Color Combination	104,948
Does Not Match: Correct Model, Year and At Least One-Color Combination	220,707
Legacy Grouping Analysis (likely fraud)	33,240
Inconsistent Location Pattern (likely fraud)	301
Total	359,196

Please let us know if you have any questions or need additional information.

Best,
 Jenny

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From: Antonio Vozzolo <avozzolo@vozzolo.com>
Sent: Thursday, May 11, 2023 2:53 PM
To: Jenny Shawver <jshawver@angeiongroup.com>; Martha Geer <mgeer@milberg.com>; Smith, Jeremy S.

<JSSmith@gibsondunn.com>; Chorba, Christopher <CChorba@gibsondunn.com>; Itfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>; Andrea Clisura <AClisura@vozzolo.com>; aleslie@bursor.com; Katharine Batchelor <KBatchelor@milberg.com>; Jonathan Cohen <jcohen@milberg.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>
Cc: Lacey Rose <LRose@angeiongroup.com>; Steven Weisbrot <steve@angeiongroup.com>
Subject: RE: [External] RE: Jimenez v Artsana USA Claim Status Update

[EXTERNAL]

Jenny,

How difficult would it be to provide an update of the numbers provided in the chart below.

Best regards,

AV

From: Jenny Shawver <jshawver@angeiongroup.com>

Sent: Friday, April 14, 2023 6:06 PM

To: Martha Geer <mgeer@milberg.com>; Smith, Jeremy S. <JSSmith@gibsondunn.com>; Antonio Vozzolo <avozzolo@vozzolo.com>; Chorba, Christopher <CChorba@gibsondunn.com>; Itfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>; Andrea Clisura <AClisura@vozzolo.com>; aleslie@bursor.com; Katharine Batchelor <KBatchelor@milberg.com>; Jonathan Cohen <jcohen@milberg.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>

Cc: Lacey Rose <LRose@angeiongroup.com>; Steven Weisbrot <steve@angeiongroup.com>

Subject: RE: [External] RE: Jimenez v Artsana USA Claim Status Update

Dear Counsel,

We would like to share additional analysis with you. One set based on unique class members as of April 9, and a set based on products claimed as of April 13. Please let us know if you have any questions. Thanks!

Check as of April 9	Count
Matches: Correct Model, Year, and At Least One-Color Combination	73,529
Does Not Match: Model, Year and At Least One-Color Combination	108,889
Legacy Grouping Analysis (likely fraud)	7,453
Inconsistent Location Pattern (likely fraud)	830
Total	190,701

Claimed products as of April 13

Option	Claimed Products
Neither	10,258
\$50	1,517
\$25	207,327
Both	127
	219,229

Group	Claimed Products
No Group	11,744

AC	287
BC	75
ABCD	327
AB	204,951
ABC	1,388
A	25
ACD	25
AD	64
D	1
ABD	234
CD	22
BD	35
BCD	8
B	43
	219,229

Let us know if you have any questions.

Best,
Jenny

Jenny Shawver

Senior Project Manager

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From: Jenny Shawver

Sent: Wednesday, April 12, 2023 4:01 PM

To: Martha Geer <mgeer@milberg.com>; Smith, Jeremy S. <JSSmith@gibsondunn.com>; Antonio Vozzolo <avozzolo@vozzolo.com>; Chorba, Christopher <CChorba@gibsondunn.com>; ltfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>; Andrea Clisura <AClisura@vozzolo.com>; aleslie@bursor.com; Katharine Batchelor <KBatchelor@milberg.com>; Jonathan Cohen <jcohen@milberg.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>

Cc: Lacey Rose <LRose@angeiongroup.com>; Steven Weisbrot <steve@angeiongroup.com>

Subject: RE: [External] RE: Jimenez v Artsana USA Claim Status Update

Dear Counsel,

We have completed the analysis offering you insight into which elements of “year/model/color” the class members are most getting wrong. As you’ll see from the chart below, the color has the highest percentage.

Notes/caveats:

- These are claimed products, and not unique claims. There can be multiple products entered per claim. The claims average 1.06 product entries per claim.
- The claim form presented more opportunities to choose a non-existent color than the other attributes, so this should be factored into any interpretation of the numbers.
- The year matching was based on manufactured year in the product catalog, but purchase year in the claim form.

Claim & Product Matching Matrix (all claims up through ~7pm EST on 4/11):

Model Match	Primary Color Match	Secondary Color Match	Year Match	Total Product Entries	Percentage	Sw
X			X	63,093	32.591%	
X	X		X	25,813	13.334%	
X		X	X	23,719	12.252%	
X		X		15,532	8.023%	
X				13,927	7.194%	
X	X			11,720	6.054%	
X	X	X		10,752	5.554%	
X	X	X	X	10,269	5.305%	
	X	X	X	7,724	3.990%	
		X	X	7,122	3.679%	
	X		X	2,846	1.470%	
	X	X		989	0.511%	
				62	0.032%	
			X	13	0.007%	
	X			8	0.004%	
		X		1	0.001%	

If you have any questions, please don’t hesitate to reach out.

Best,
Jenny

Jenny Shawver

Senior Project Manager

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From: Martha Geer <mgeer@milberg.com>
Sent: Friday, April 7, 2023 2:12 PM
To: Steven Weisbrot <steve@angeiongroup.com>
Cc: Smith, Jeremy S. <JSSmith@gibsondunn.com>; Jenny Shawver <jshawver@angeiongroup.com>; Chorba, Christopher <CChorba@gibsondunn.com>; ltfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>; Andrea Clisura <AClisura@vozzolo.com>; aleslie@bursor.com; Katharine Batchelor <KBatchelor@milberg.com>; Lacey Rose <LRose@angeiongroup.com>; Jonathan Cohen <jcohen@milberg.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Antonio Vozzolo <avozzolo@vozzolo.com>
Subject: RE: [External] RE: Jimenez v Artsana USA Claim Status Update

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Hi Steve, just checking in on whether your folks were able to get any insight into which elements of “year/model/color” the class members were most getting wrong. Thanks – hope you have a good weekend.

Marty

From: Steven Weisbrot <steve@angeiongroup.com>
Sent: Wednesday, April 5, 2023 6:19 PM
To: Martha Geer <mgeer@milberg.com>
Cc: Smith, Jeremy S. <JSSmith@gibsondunn.com>; Jenny Shawver <jshawver@angeiongroup.com>; Chorba, Christopher <CChorba@gibsondunn.com>; ltfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>; Andrea Clisura <AClisura@vozzolo.com>; aleslie@bursor.com; Katharine Batchelor <KBatchelor@milberg.com>; Lacey Rose <LRose@angeiongroup.com>; Jonathan Cohen <jcohen@milberg.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Antonio Vozzolo <avozzolo@vozzolo.com>
Subject: Re: [External] RE: Jimenez v Artsana USA Claim Status Update

Understood; that is helpful. Thank you.

Let us examine the data and see if we can identify any meaningful trends.

On Apr 5, 2023, at 5:16 PM, Martha Geer <mgeer@milberg.com> wrote:

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Steve, I think we were hoping you might be able to answer for us *which* of the elements of “year/model/color” the class members are getting wrong. Are they identifying colors that aren’t colors used on Evenflo booster seats or colors that don’t match the year or the model? We certainly understand that you can’t know why they are getting identifying info wrong. Thanks.

Marty

Martha A. Geer
Partner
<image001.jpg>

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<image002.png>
<image003.png>
<image004.png>
<image005.png>

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From: Smith, Jeremy S. <JSSmith@gibsondunn.com>
Sent: Wednesday, April 5, 2023 4:42 PM
To: Steven Weisbrot <steve@angeiongroup.com>; Jenny Shawver <jshawver@angeiongroup.com>; Chorba, Christopher <CChorba@gibsondunn.com>
Cc: ltfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>; Andrea Clisura <AClisura@vozzolo.com>; aleslie@bursor.com; Katharine Batchelor <KBatchelor@milberg.com>; Lacey Rose <LRose@angeiongroup.com>; Jonathan Cohen <jcohen@milberg.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Martha Geer <mgeer@milberg.com>; Antonio Vozzolo <avozzolo@vozzolo.com>
Subject: RE: [External] RE: Jimenez v Artsana USA Claim Status Update

Adding Chris to the chain.

Jeremy S. Smith

GIBSON DUNN

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Tel +1 213.229.7973 • Fax +1 213.229.6973
JSSmith@gibsondunn.com • www.gibsondunn.com

From: Steven Weisbrot <steve@angeiongroup.com>
Sent: Wednesday, April 5, 2023 9:16 AM
To: Jenny Shawver <jshawver@angeiongroup.com>; Smith, Jeremy S. <JSSmith@gibsondunn.com>
Cc: ltfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>; Andrea Clisura <AClisura@vozzolo.com>; aleslie@bursor.com; Katharine Batchelor <KBatchelor@milberg.com>; Lacey Rose <LRose@angeiongroup.com>; Jonathan Cohen <jcohen@milberg.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Martha Geer <mgeer@milberg.com>; Antonio Vozzolo <avozzolo@vozzolo.com>
Subject: RE: [External] RE: Jimenez v Artsana USA Claim Status Update

[WARNING: External Email]

Jeremy, et al.,

We've been spending a good deal of time thinking about the issues you raise as well as potential solutions. However, we are struggling to understand what type of data could accurately give the parties

an indication as to “ why the claimants are getting the year/model/color combination wrong.” To us it seems relatively straightforward, in that claimants choosing the incorrect a/b combos are either misremembering or attempting to claim falsely. How we might be able to impute their motive is confounding but if the parties have any suggestions, we are glad to look into them.

In order to meet the twin goals of allowing all valid claims while also doing our best to eliminate fraud, we would encourage the parties to consider amending the work flow as suggested earlier. We are glad to discuss further at your convenience.

Thank you,
Steve

From: Jenny Shawver <jshawver@angeiongroup.com>
Sent: Friday, March 31, 2023 8:58 PM
To: Smith, Jeremy S. <JSSmith@gibsondunn.com>; Steven Weisbrot <steve@angeiongroup.com>
Cc: ltfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>; Andrea Clisura <AClisura@vozzolo.com>; aleslie@bursor.com; Katharine Batchelor <KBatchelor@milberg.com>; Lacey Rose <LRose@angeiongroup.com>; Jonathan Cohen <jcohen@milberg.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Martha Geer <mgeer@milberg.com>; Antonio Vozzolo <avozzolo@vozzolo.com>
Subject: RE: [External] RE: Jimenez v Artsana USA Claim Status Update

Jeremy,

My apologies for the delayed response. We are looking into this and will be getting back with you early next week.

Best,
Jenny

Jenny Shawver
Senior Project Manager
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From: Smith, Jeremy S. <JSSmith@gibsondunn.com>
Sent: Thursday, March 30, 2023 6:58 PM
To: Jenny Shawver <jshawver@angeiongroup.com>; Steven Weisbrot <steve@angeiongroup.com>
Cc: ltfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>; Andrea Clisura <AClisura@vozzolo.com>; aleslie@bursor.com; Katharine Batchelor <KBatchelor@milberg.com>; Lacey Rose <LRose@angeiongroup.com>; Jonathan Cohen <jcohen@milberg.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Martha Geer <mgeer@milberg.com>; Antonio Vozzolo <avozzolo@vozzolo.com>
Subject: [External] RE: Jimenez v Artsana USA Claim Status Update

[This is an External Email – Do Not Click Unsolicited Links or Attachments]

Steve and Jenny,

The parties spoke this evening about the data shared on A-B claims to date. As you know, we remain concerned with the numbers, which show more than 93% of those selecting the \$25 option, and more than 50% of those claimant getting it wrong (13,000+ of the 24,703). These numbers reinforce our concern that the A-B combo invites fraud since people can guess the criteria. But we also recognize the focus on the A-B criteria may even cause honest claimants to have their claims rejected too, because they got the year/model/color combination wrong when they could have submitted a more reliable indicator like serial number.

Before agreeing to a change in the flow or matrix, we'd like to see more data on why the claimants are getting the year/model/color combination wrong. Is that something that you can help with, and if so, could you provide an estimate of the cost? If possible, we'd very much like to get this sorted out quickly because the social media advertisements are running now and all the other forms of notice have already gone out.

Thanks,

Jeremy

Jeremy S. Smith

GIBSON DUNN

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333 South Grand Avenue, Los Angeles, CA 90071-3197
Tel +1 213.229.7973 • Fax +1 213.229.6973
JSSmith@gibsondunn.com • www.gibsondunn.com

From: Jenny Shawver <jshawver@angeiongroup.com>
Sent: Friday, March 24, 2023 11:45 AM
To: Antonio Vozzolo <avozzolo@vozzolo.com>; Martha Geer <mgeer@milberg.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Jonathan Cohen <jcohen@milberg.com>; Smith, Jeremy S. <JSSmith@gibsondunn.com>
Cc: ltfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>; Andrea Clisura <AClisura@vozzolo.com>; aleslie@bursor.com; Katharine Batchelor <KBatchelor@milberg.com>; Steven Weisbrot <steve@angeiongroup.com>; Lacey Rose <LRose@angeiongroup.com>
Subject: RE: Jimenez v Artsana USA Claim Status Update

[WARNING: External Email]

Dear Counsel,

To give the parties time to ingest our early findings and determine if they are satisfied with the claims filing workflow, we have completed an initial analysis based on claims filed specifically in the A/B option group (and received as of 3/22/2023 at 12:00 p.m.). As seen in the previously circulated data, claimants are heavily utilizing the A/B option. So this analysis evaluates whether the A/B claims had accurate descriptions of model, year the product was sold, and at least one of the colors (either Primary or Secondary).

Check	Count
Matches: Correct Model, Year, and At Least One Color Combination	10, 935
Does Not Match: Model, Year and At Least One Color Combination	13,223
Legacy Grouping Analysis (likely fraud)	201
Bot Pattern (likely fraud)	64
Inconsistent Location Pattern (likely fraud)	280
Total	24,703

If you have any questions, please let us know.

Best,
Jenny

Jenny Shawver

Senior Project Manager

Angeion Group

1650 Arch Street, Suite 2210

Philadelphia, PA 19103

(215) 563-4116 (Office)

(267) 996-3847 (Direct)

(215) 525-0209 (Fax)

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From: Jenny Shawver

Sent: Wednesday, March 15, 2023 1:01 PM

To: Antonio Vozzolo <avozzolo@vozzolo.com>; Martha Geer <mgeer@milberg.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Jonathan Cohen <jcohen@milberg.com>; Smith, Jeremy S. <JSSmith@gibsondunn.com>

Cc: ltfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>; Andrea Clisura <AClisura@vozzolo.com>; aleslie@bursor.com; Katharine Batchelor <KBatchelor@milberg.com>; Steven Weisbrot <steve@angeiongroup.com>; Lacey Rose <LRose@angeiongroup.com>

Subject: Jimenez v Artsana USA Claim Status Update

Hi All,

Hope everyone is doing well today. We wanted to share with you some initial stats on the claims received thus far.

Breakdown of claims filed by dollar option (distinct claims, excluding quantity of products claimed):

\$50	593
\$25	8,908
Both	39
Neither (Login Claims)	3,590

Breakdown of the selections made within the \$25 option (numbers are higher since people can claim multiple products):

AB	11,624
ABC	471
ABCD	107
ABD	76
AC	106
ACD	6
AD	24
BC	28
BCD	2
BD	11
CD	19

Total products claimed is approximately 17,000 so far. This is raw data so would need further analysis to confirm a hard number.

If you have any questions, please don't hesitate to reach out.

Best,
Jenny

Jenny Shawver
Senior Project Manager

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Exhibit C

From: Steven Weisbrot <steve@angeiongroup.com>
Sent: Thursday, March 2, 2023 9:45 AM
To: Smith, Jeremy S. <JSSmith@gibsondunn.com>
Cc: Chorba, Christopher <CChorba@gibsondunn.com>
Subject: RE: [External] Artsana Models

[WARNING: External Email]

Gents-

We ran the numbers, and as you know, claim rates vary greatly by case and are determined by many factors. After conducting an internal statistical analysis and applying that to the specific conditions in Artsana. We determined, with a confidence interval of 99%, there is an upper bounds of liability of \$1.5M. This is based on an average of 97% of claims being filed without proof while only 3% are filed with proof.

However, while empirical data suggests a certain range, outlier cases should not be ignored as there have been a recent phenomenon of individuals willing to perjure themselves to file a claim in no proof settlements. A few examples, applied to Artsana would yield the following results:

- *Example Case #1 saw a 2,141% more claims than average, suggesting liability up to \$9,582,733.75*
- *Example Case #2 saw a 738% more claims than average, with a liability up to \$3,302,128.50*
- *Example Case #3 saw a 2,404% more claims than average, indicating liability up to \$10,761,079.50*
- *Example Case #4 saw 709% more claims than average, indicating liability up to \$3,174,588.75*

Exhibit D

From: Jenny Shawyer
 To: Marsha Geer; Smith, Jeremy S.; Chorb, Christopher; Antonio Vazquez; Rubin, Daniel M.; Jonathan Cohen; Katharine Batchelor; alester@bursor.com; Andreea Căstura; MSheer@bursor.com; Greg Coleman
 Cc: Lacey Rose; Steven Weisbrod
 Subject: RE: Jimenez v Artsana USA | Claims Preliminary Validations
 Date: Monday, August 14, 2023 4:20:24 PM
 Attachments: image012.png
 image013.png
 image014.png
 image015.png
 image016.png
 image017.png
 image018.png
 image019.png
 image020.png
 image021.png
 image022.png
 image023.png
 image024.png

[WARNING: External Email]

Counsel:

We have finished calculating the number of products claimed based on the July 26th preliminary analysis. Based the findings below, we suggest implementing a deficiency process, which we'll elaborate on at the end of this email.

First, I want to reiterate that the counts reflected in the July 26th report were products claimed and not unique claimants. Also, the numbers below only contemplate claims with no proof of purchase, as we are still reviewing the supporting documents submitted (2,202 pending claims).

In reviewing the raw data, we believe that the numbers are inflated, as claimants submitted a wide range of product quantities that range from a reasonable number to improbable and ultimately impossible. This information comes from the field at the bottom of the form snippet provided below.

- A. ☐ Check here if you are requesting \$50.00 for one or more Eligible Product by enclosing Proof of Purchase or if you purchased an Eligible Product from www.chiccoua.com or registered an Eligible Product with Artsana or NHTSA.

Please provide the number of Eligible Products purchased during the Class Period for which you are providing proof of purchase:

- B. ☐ Check here if you are requesting \$25.00 as you do not have any Proof of Purchase. If you do not have Proof of Purchase, you must complete the chart on the following page.

Please provide the number of Eligible Products purchased during the Class Period for which you do not have proof of purchase:

To assist with determining a reasonable threshold for deficiency process, we have broken down the claimants into two groups based on the number of seats claimed:

- Group A represents the claims broken out by number of seats along with a running total of units claimed and amount
- Group B represents an implausible number of seats purchased

Group A: Up to 10 Seats Claimed				
Claimed quantity with no proof	Count of Claims	Cumulative Claim Count	Total Amount	Cumulative Total
1	99,994	99,994	\$2,499,850	\$2,499,850
2	6,902	106,896	\$345,100	\$2,844,950
3	1,323	108,219	\$99,225	\$2,944,175
4	10,684	118,903	\$1,068,400	\$4,012,575
5	319	119,222	\$39,875	\$4,052,450
6	2,077	121,299	\$311,550	\$4,364,000
7	40	121,339	\$7,000	\$4,371,000
8	312	121,651	\$62,400	\$4,433,400
9	3,101	124,752	\$697,725	\$5,131,125
10	174	124,926	\$43,500	\$5,174,625

Group B: 11+ Seats Claimed (Aggregate Total)		
Claimed quantity with no proof	Count of Claims	Total Amount
11 up to 67,486,489,847,875	6,787	\$5,154,431,296,425,250.00

In terms of claim form data, we found there are some claimants who answered the required questions for fewer products than claimed. For example, a claimant claims to have purchased 2 seats without proof of purchase, but only answered the required questions for one product. There is a total of 12,627 claimants that currently fall into this category.

Also, during our review of some claims in Group B, we found there are some claimants who did not actually put the number of products purchased but rather, an item number of a seat. Because our system recognizes this field as a number, it's translating it as such and therefore skewing the numbers in Group B. As an

example, there were nine claimants where our system picked up the count of seats purchased as 5,079,014,570,070 when in fact this is the item number for this booster seat model: <https://www.chiccousa.com/shop-our-products/car-seats/booster/kidfit-2-in-1-belt-positioning-booster-car-seat-atmosphere/05079014570070.html>.

We additionally identified some where it appears the number they entered could be a date and not the count of seats they purchased. Here is a sampling of those:

Claimed quantity with no proof	Possible Date
5,012,016	5/1/2016
5,122,021	5/1/2021
5,252,018	5/5/2018
5,252,020	5/25/2020
6,152,015	6/15/2015
6,162,019	6/16/2019

It will take us some time to parse through the inflated claims counts to see if we can recognize any other patterns (possibly a serial number), but wanted to share our preliminary findings now, so you're in the loop with what we are seeing.

In paragraph 87, pgs. 34-35, Settlement Agreement states in part, "The Settlement Administrator shall determine, after consultation with Class Counsel and Artsana's Counsel, whether to allow a Class Member an opportunity to cure a deficient Claim Form." Based on the current analysis, we suggest implementing a deficiency process. We expect that the parties will have their own thoughts as to the contours of the process and welcome your suggestions. Alternatively, we can suggest a process. Please let us know your thoughts.

Best,
Jenny

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From: Jenny Shawver

Sent: Wednesday, July 26, 2023 5:24 PM

To: Martha Geer <mgeer@milberg.com>; Smith, Jeremy S. <JSmith@gibsondunn.com>; Chorba, Christopher <CChorba@gibsondunn.com>; Antonio Vozzolo <avozzolo@vozzolo.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Jonathan Cohen <jcohen@milberg.com>; Katharine Batchelor <KBatchelor@milberg.com>; aleslie@bursor.com; Andrea Clisura <AClisura@vozzolo.com>; ltfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>
Cc: Lacey Rose <LRose@angeiongroup.com>; Steven Weisbrot <steve@angeiongroup.com>
Subject: RE: Jimenez v Artsana USA | Claims Preliminary Validations

Dear Counsel:

Thank you again for your patience while we worked through this process. Below are the results for our preliminary analysis. The document review on the pending claims is not completed so these have no current status. Please review and let us know if you have any questions. We are happy to set up a call to discuss in more detail.

Best,
Jenny

PRELIMINARY CLAIM VALIDATION AND FRAUD ANALYSIS RESULTS SUMMARY		
Status	Reason	Count
Valid	Match on combination key, match on retailer name and not suspicious for fraud	129,512
Pending	Not suspicious for fraud but require review (Claims with Supporting Documents)	2,202
Invalid	Does not match on combination key (No match on model, year and at least one color)	349,995
Invalid	Does not match on retailer (No retailer name or invalid retailer)	66,123
Invalid	Grouping analysis (Fraud flag)	411,266
Invalid	Bot pattern detected (Fraud flag)	6,639
Invalid	Inconsistent location pattern (Fraud flag)	5,256
Invalid	Disposable or suspicious domain (Fraud flag)	17,015
TOTAL		988,008

SERIAL NUMBER VALIDATION SUMMARY	
Type	Count
Valid serial number	1,046
Invalid serial number	986,962
TOTAL	988,008

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From: Martha Geer <mgeer@milberg.com>
Sent: Tuesday, July 25, 2023 5:58 PM
To: Jenny Shawver <jshawver@angeiongroup.com>; Smith, Jeremy S. <JSSmith@gibsondunn.com>; Chorba, Christopher <CChorba@gibsondunn.com>; Antonio Vozzolo <avozzolo@vozzolo.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Jonathan Cohen <jcohen@milberg.com>; Katharine Batchelor <KBatchelor@milberg.com>; aleslie@bursor.com; Andrea Clisura <AClisura@vozzolo.com>; ltfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>
Cc: Lacey Rose <LRose@angeiongroup.com>; Steven Weisbrot <steve@angeiongroup.com>
Subject: RE: Jimenez v Artsana USA | Weekly Status Report

[EXTERNAL]

Thanks, Jenny. We appreciate it.

Martha A. Geer
 Partner



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From: Jenny Shawver <jshawver@angeiongroup.com>
Sent: Tuesday, July 25, 2023 8:11 PM
To: Martha Geer <mgeer@milberg.com>; Smith, Jeremy S. <JSSmith@gibsondunn.com>; Chorba, Christopher <CChorba@gibsondunn.com>; Antonio Vozzolo <avozzolo@vozzolo.com>; Rubin, Daniel M. <DRubin@gibsondunn.com>; Jonathan Cohen <jcohen@milberg.com>; Katharine Batchelor <KBatchelor@milberg.com>; aleslie@bursor.com; Andrea Clisura <AClisura@vozzolo.com>; ltfisher@bursor.com; Greg Coleman <gcoleman@milberg.com>
Cc: Lacey Rose <LRose@angeiongroup.com>; Steven Weisbrot <steve@angeiongroup.com>
Subject: Jimenez v Artsana USA | Weekly Status Report

Counsel,

Please find attached this week's status report for the *Jimenez v Artsana USA* settlement.

We are still working on the preliminary claim validation report and apologize for the delay. We should have this wrapped up tomorrow and I will keep you posted. Thank you for your patience.

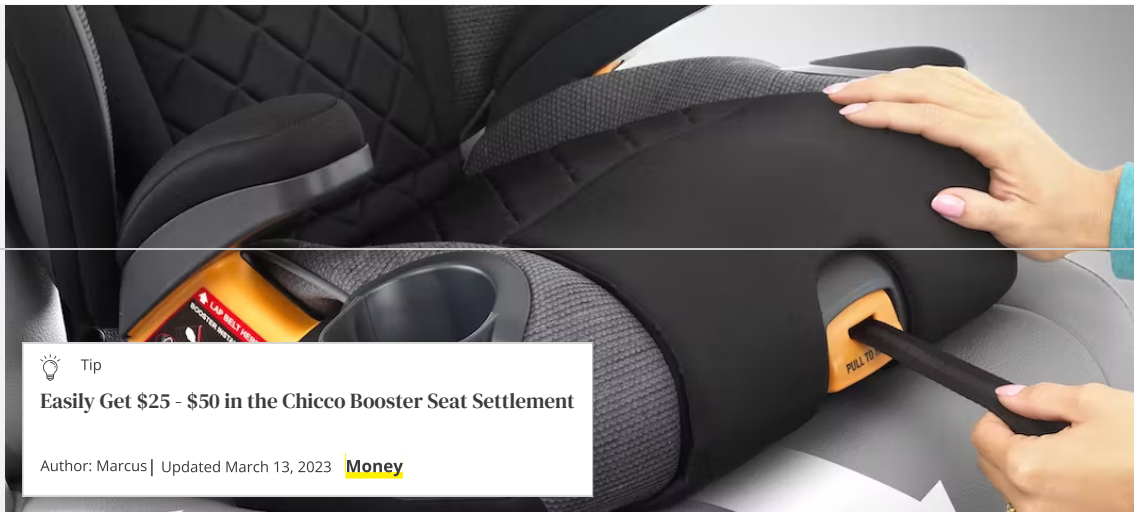
Best,
 Jenny

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Exhibit E



Tip

Easily Get \$25 - \$50 in the Chicco Booster Seat Settlement

Author: Marcus | Updated March 13, 2023 [Money](#)

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Parents, listen up! If you bought a Chicco "KidFit" booster seat for your child, you could be entitled to some money in a class action settlement. Chicco got sued over claims that their booster seats weren't safe for kids who weighed less than 40 pounds, even though they were marketed as being safe for kids as light as 30 pounds. Chicco denies the allegations, but they're settling the case to avoid going to trial.

So if you bought the qualifying Chicco booster seat between April 22, 2015, and Dec. 31, 2021, you might be eligible to get some cash back — up to \$50 with proof of purchase or \$25 without proof. Chicco KidFit Booster Seats were sold nationwide in the United States at major retailers, including Walmart, Target, Amazon, and BuyBuy Baby, as well as on the Chicco website and other online retailers.

Here's what you need to know:

You're part of the settlement class if you bought a KidFit Chicco Booster seat between 2015 and 2021.

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Ok



The Artsana “KidFit” Chicco Booster Seat Settlement includes several Chicco “KidFit” car booster seat models. If you purchased any of the following Chicco booster seats between April 22, 2015, and Dec. 31, 2021, you may be eligible to file a claim:

- Chicco KidFit
- Chicco KidFit Zip
- Chicco KidFit Zip Air
- KidFit Luxe
- KidFit Plus
- KidFit Air Plus

Note: There was never a recall issued for these products, and only the above-mentioned Chicco “KidFit” booster seat models are included in the settlement. Other Chicco car seat models are not included.

Even if you don’t have proof of purchase, you can still get \$25 by answering some questions.

If you have receipts or other documentation of your purchase, you can get the maximum payment of \$50. If you don’t have proof of purchase, you can still receive \$25 by providing two of the following four attestations when filing a claim form:

- The serial number for the Chicco booster seat
- The model of the product purchased, as well as the color of the booster seat
- Purchase information about the Chicco car seat, such as the name of the retailer where it was purchased, month or season, and year of purchase
- If the Chicco booster seat was not purchased online, the city and state in which it was purchased, as well as a picture of it.

By providing two of these attestations, you’re essentially attesting or declaring under oath that you did, in fact, purchase a Chicco “KidFit” booster seat during the eligible time period, even if you don’t have documentation to prove it. (So be honest!)



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How do I make a claim?

If you believe you're eligible to make a claim in the Artsana "KidFit" Chicco Booster Seat Settlement, you can submit a claim form online or by mail. The deadline to make a claim is Dec. 11, 2023.

To file a claim online, visit the **Artsana settlement** website and click on the "File a Claim" button. You will then need to provide some basic information about yourself and your purchase, including your name, address, phone number, and email address, as well as the model and color of the Chicco booster seat you purchased, the name of the retailer where bought it, and the month and year of purchase.

If you prefer to mail your claim form instead of submitting it online, you can send it to the following address:

Chicco KidFit Settlement
c/o Heffler Claims Group
P.O. Box 58369
Philadelphia, PA 19102-8369

Expect payment sometime in early 2024.

We don't have an exact date yet for the final approval hearing for the Artsana "KidFit" Chicco Booster Seat Settlement just yet, but based on the Dec. 11, 2023, claims deadline, you can expect it to happen in late 2023. (Keep in mind that the claims deadline of Dec. 11, 2023, could change, depending on when the court grants final approval.)

After the settlement receives final approval, it may take several months for payments to be distributed. We've got lots more to say about **how class action settlements work**.

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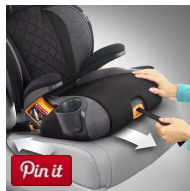


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What Is a Class Action Lawsuit? How to Get Settlement Money

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Exhibit F

 SWEEPSTAKESBIBLE < <https://www.sweepstakesbible.com/blog/>>

Open Class Action Settlements with No Proof of Purchase 2023



A perfect combination of luxury & nature with the destination includ

Hundreds of class action lawsuit settlements are revealed each year, but settlements with no proof of purchase are most favorable to claim, so we have enlisted all Class Action Settlements with No Proof of Purchase for 2023.

Get your rewards in exchange for forged services, or products performed by the seller! Making any in-store or online purchase, sometimes manifest the incompetence of the brands, manufacturing companies, or marketers which ultimately results in customers' loss, relying on their products or supplies, or even services. With one push of buttons, you may enter or join any lawsuit against fraudulent companies, brands,

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contribute without any impediments. Devoid doubts to join the class action lawsuits as they are legitimate in terms of offering justice to the customers, who are suffering from falsified products or services by the opponent parties, racking up to win your money allowance or beneficial favors from the settlements, that the companies have to offer!

List of Latest Open No Proof Required Class Action Settlements to Claim with Ease in 2023

1. New Jersey Incarcerated Students with Disabilities IDEA Violations Class Action Settlement

Claim Form Deadline: 01/31/2024 (Estimated)

Estimated Payout: Varies

Proof Required: No

Method of payment: NA

Settlement Website: ACLU-NJ.org

Final Hearing: 03/03/2022

2. Equifax Data Breach Settlement < <https://www.sweepstakesbible.com/blog/settlement/425m-equifax-breach-settlement-equifaxbreachsettlement-com/>>



ine: 01/22/2024

\$125.00 – \$250.00

o

nt: PayPal / Mailed Check

te: EquifaxBreachSettlement.com

ass Action Settlement

ine: 03/27/2023

\$75.00 (Cash) – \$600 (Voucher)

o

Method of payment: MasterCard / Zelle / Venmo / PayPal / ACH

Final Hearing: 01/26/2023

Settlement Website: Multi-PlyCookwareSettlement.com

4. Wesson Oil False Advertising Class Action Settlement < <https://www.sweepstakesbible.com/blog/settlement/wesson-oil-settlement-over-false-advertisements-wessonoilsettlement-com/>>

Claim Form Deadline: 05/22/2023

Estimated Payout: \$0.15 Per Unit

Proof Required: No

Method of payment: PayPal / Mailed Check

Final Hearing: 04/24/2023

Settlement Website: WessonOilSettlement.com



5. Experian, T-Mobile data breach \$16M class action settlement**Claim Form Deadline:** 05/06/2023**Estimated Payout:** Free credit monitoring services**Proof Required:** No proof of purchase applicable**Settlement Website:** TMobileApplicant2015EISDataBreachSettlement.com**hners basketball coach abuse \$1.9M class action settlement****ine:** 03/23/2023

Varies

o proof of purchase applicable

23/2023

te: BarnstormerSettlement.com**imination \$2.2M class action settlement****ine:** 04/24/2023

Varies

o proof of purchase applicable

te: WaitTimeFeeSettlement.com**inty wrongful detention \$2.375M class action settlement****ine:** 09/04/2023

Varies – \$250/\$295 per hour

o proof of purchase applicable

08/2022

te: SantaClaraOverDetention.com**9. Ocala, Florida, illegal fire service fees \$79M common fund****Claim Form Deadline:** 07/01/2023**Estimated Payout:** Varies**Proof Required:** No proof of purchase applicable**Final Hearing:** 05/10/2022**Settlement Website:** OcalaFireFee.com**10. Pork Price Fixing Settlement****Claim Form Deadline:** 06/30/2023**Estimated Payout:** Varies**Proof Required:** No**Method of payment:** Mailed Check

Final Hearing: 03/30/2023

Settlement Website: OverChargedForPork.com

11. \$2.35 Million Dickey's Barbecue

Claim Form Deadline: 04/22/2023

Estimated Payout: \$50 – \$100

Proof Required: No

Method of payment: PayPal / Venmo / Zelle / ACH / Vouchers

Final Hearing: 06/06/2023

Settlement Website: DickeysClassAction.com

12. How to Get Money in the \$5M Thinx Underwear Class Action Settlement

Claim Form Deadline: 04/12/2023

Estimated Payout: \$10.50 (Without Proof) – \$52.50 (Voucher)

Proof Required: No

☒ 24/2023

te: ThinxUnderwearSettlement.com

bail over-detention class action settlement

ine: 06/06/2023

\$3,500

/A

11/2023

te: nycbailsettlement.com

w Bethea Hospital data breach \$380k class action settlement

ine: 03/21/2023

\$250

/A

28/2023

te: ksbsettlement.com

lk pre-recorded calls \$2.6M class action settlement

ine: 03/30/2023

Estimated Payout: \$140

Proof Required: N/A

Final Hearing: 04/25/2023

Settlement Website: lucastcpasettlement.com

16. Hewlett Packard (HP) equal pay \$8.5M class action lawsuit settlement

Claim Form Deadline: 03/21/2023

Estimated Payout: Varies

Proof Required: N/A

Final Hearing: 04/27/2023

Settlement Website: equalpaysettlement.com

17. AT&T data throttling FTC settlement



Claim Form Deadline: 05/18/2023
Estimated Payout: Varies
Proof Required: N/A
Final Hearing: 11/05/2019
Settlement Website: attdatathrottling.com

18. Menorah Medical Center RN wage-and-hour \$1.8M class action settlement



Claim Form Deadline: 03/29/2023
Estimated Payout: Varies
Proof Required: N/A
Final Hearing: 11/14/2023
Settlement Website: midwestdivisionmmcmemployeeaction.com

19. TMX fingerprint privacy \$472K class action settlement

Claim Form Deadline: 05/06/2023
Estimated Payout: Varies
Proof Required: N/A
Final Hearing: 11/22/2023
Settlement Website: tmxfingerprintsettlement.com

Inflation Class Action Settlement < <https://www.sweepstakesbible.com/blog/settlement/broiler-over-charged-for-it-overchargedforchicken-com/>>

Claim Form Deadline: 04/03/2023
Estimated Payout: Varies
Proof Required: No proof of purchase applicable

Final Hearing: 05/02/2023
Settlement Website: OverChargedForChicken.com

21. Centennial Bank force-placed insurance \$730K class action settlement

Claim Form Deadline: 04/03/2023
Estimated Payout: Varies
Proof Required: No proof of purchase applicable
Final Hearing: 05/02/2023
Settlement Website: CentennialBankSettlement.com

22. iSolved fingerprint time clocks \$2.5M class action lawsuit settlement

Claim Form Deadline: 04/11/2023
Estimated Payout: Between \$640 and \$965 (estimated)
Proof Required: No proof of purchase applicable



Final Hearing: 05/11/2023

Settlement Website: iSolvedBIPASettlement.com

23. The Economist Michigan information privacy \$9.5M class action settlement

Claim Form Deadline: 04/12/2023

Estimated Payout: \$261 (estimated)

Proof Required: No proof of purchase applicable

Final Hearing: 03/15/2023

Settlement Website: EconomistNewspaperSettlement.com



metric privacy \$90.4K class action settlement

ine: 03/21/2023

\$352.11 (estimated)

o proof of purchase applicable

20/2023

te: PacesetterBiometricsSettlement.com

ib telemarketing \$2.95M class action lawsuit settlement

ine: 05/10/2023

\$140.47

o proof of purchase applicable

20/2023

te: SDCFTSASettlement.com

i University COVID-19 tuition \$6.6M class action settlement

Claim Form Deadline: 03/18/2023

Estimated Payout: Varies

Proof Required: No proof of purchase applicable

Final Hearing: 04/17/2023

Settlement Website: JHUSpring2020Settlement.com

27. Chicco KidFit Child Booster Seat Class Action Settlement

Claim Form Deadline: 12/11/2023

Estimated Payout: \$25 (Without Proof) – \$50 (With Proof)

Proof Required: No

Final Hearing: 10/12/2023

Settlement Website: ArtsanaBoosterSeatSettlement.com





28. \$60 Million AT&T Settlement – Data Throttling

Claim Form Deadline: 05/18/2023

Estimated Payout: \$10 – \$23

Proof Required: No

Settlement Website: [FTC.gov/refunds](https://ftc.gov/refunds)

29. \$33 Million CRT Class Action Settlement

Claim Form Deadline: 06/13/2023

Estimated Payout: \$10 (min) – 3x Damages (Max)

Proof Required: No

Method of payment: PayPal / Venmo / Mailed Check

01/2023

te: CRTClaims.com

s \$2.75M class action lawsuit settlement

ine: 05/03/2023

\$30 to \$60 (estimated)

o proof of purchase applicable

10/2023

te: CitrixTCPASettlement.com

1 eviction fees \$885K class action settlement

ine: 04/14/2023

\$60 for collection letters and/or \$190 for eviction fees

o proof of purchase applicable

14/2023

te: NCPalmsTenantsClass.com

32. Transworld debt-collection calls \$1.56M class action settlement

Claim Form Deadline: 04/21/2023

Estimated Payout: Varies

Proof Required: No proof of purchase applicable

Final Hearing: 05/30/2023

Settlement Website: LandryTSI.com



33. United Dental false advertising class action settlement

Claim Form Deadline: 04/05/2023

Estimated Payout: \$50

Proof Required: No proof of purchase applicable

Final Hearing: 05/30/2023

Settlement Website: UnitedDentalSettlement.com

34. Connected Investors robocalls \$2M class action settlement

Claim Form Deadline: 06/17/2023

Estimated Payout: \$29.10


Proof Required: No proof of purchase applicable

Final Hearing: 06/02/2023

Settlement Website: silvaconnectedinvestorstcpasettlement.com

35. The Week subscription holder information privacy \$5M class action settlement

Claim Form Deadline: 06/06/2023

 \$248 (estimated)

o proof of purchase applicable

28/2023

te: TheWeekSettlement.com

rt tip pooling \$240k class action settlement

ine: 04/10/2023

Varies

o proof of purchase applicable

09/2023

Settlement website: AtkinsonSettlement.com

37. Veriff facial scans \$4M class action settlement

Claim Form Deadline: 04/21/2023

Estimated Payout: \$300-\$600 (estimated)

Proof Required: No proof of purchase applicable

Final Hearing: 05/04/2023

Settlement Website: BIPAVeriffSettlement.com

Ease your process of complaints with any settlement that comes with favorable remunerations in one fell swoop Class Action Lawsuits are provided here to avoid the exhausting procedures of the court. Stay tuned to the latest no-proof required class action settlements, we update the list weekly.

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Exhibit G

Car Seat Class Action Settlement, Claim \$25 with No Receipts (\$50 with!)

 freebfinder.com/car-seat-class-action-settlement-claim-25-with-no-receipts-50-with

Wendy

August 20, 2023



Overview [hide](#)

[1 Car Seat Class Action Settlement, Claim \\$25 with No Receipts \(\\$50 with!\)](#)

[1.1 How do I file a claim?](#)

[1.2 What's this settlement about?](#)

[1.3 What Products are Included? Where were they sold?](#)

[1.4 Who is eligible for a refund?](#)

[1.5 Is a receipt required?](#)

[1.6 How much will I get back?](#)

[1.7 What's the deadline to file a claim?](#)

[1.8 What is a class action lawsuit settlement?](#)

[1.9 Want more like this?](#)

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If You Purchased a Chicco “KidFit” Booster Seat Between April 22, 2015, and December 31, 2021, You May Be Eligible for a Payment of Up to \$50 Under a Class Action Settlement. This case is known as Jimenez v. Artsana USA, Inc., Case No. 7:21-cv-07933-VB in the United States District Court, Southern District of New York.

How do I file a claim?

[Head on over to the website](#), where you can learn more and file a claim. You can file online with or without a unique ID, and you can also file by mail.

What's this settlement about?

This lawsuit involves Artsana’s Chicco-branded booster seats marketed under the “KidFit” branding, which includes the KidFit, KidFit Zip, KidFit Zip Air, KidFit Luxe, KidFit Plus, and KidFit Air Plus (the “Eligible Products”). **The lawsuit alleges that Artsana misrepresented the minimum weight requirement for and side-impact collision protection provided by its Chicco-branded “KidFit” booster seats.** Defendant denies these allegations.

What Products are Included? Where were they sold?

- KidFit
- KidFit Zip
- KidFit Zip Air
- KidFit Luxe
- KidFit Plus
- KidFit Air Plus

Who is eligible for a refund?

You are eligible to participate in the Settlement if you purchased a Chicco “KidFit” branded booster seat, including the KidFit, KidFit Zip, KidFit Zip Air, KidFit Luxe, KidFit Plus, and KidFit Air Plus models, between April 22, 2015 and December 31, 2021. To receive payment under the Settlement, you must submit a [Claim Form](#).

Is a receipt required?

Proof of purchase is not required. However, if you have receipts, you may be able to claim more.

How much will I get back?

\$50 with receipts and \$25 with no receipts.

What's the deadline to file a claim?

December 11, 2023 (earliest possible, subject to change)

What is a class action lawsuit settlement?

For example, a class action lawsuit is one with multiple plaintiffs. In other words, there are more than one person being represented by the lawsuit. In other words, a plaintiff or plaintiffs file the case on behalf of many people who were affected by aren't involved in the actual suit. For example, if you purchased an item that was later determined to be involved in a class action lawsuit, you may be entitled to compensation. If you're included in the class or group of people affected, then you can file a claim to receive money, coupons or replacement products. But, each case is different, and each will specify who is included. In addition, class action lawsuits may require proof that you are part of the group of affected people. In this case, proof of purchase or other specified proof is needed. However, in some cases, no proof is required. In that case, you can file a claim without proving that you are part of the class of people affected. Of course, when you file a claim you are doing so under penalty of perjury. So, do not file if you do not qualify.

Want more like this?

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Exhibit H



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OpenClassActions.com Alert!

If you purchased a Chicco "KidFit" Booster Seat between 04/22/2015 and 12/31/2021, you may be eligible for a payment of up to \$50 from a Class Action Settlement. You can get \$25 from this Chicco Settlement with no proof of purchase necessary to file a claim!

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(that takes people directly to the subject class action)

I may have left it out originally - my apologies

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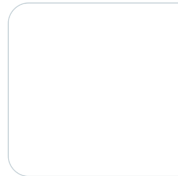


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11 Mar

<https://t.co/nCkft6kgYr> Alert! If you purchased a Chicco "KidFit" Booster Seat between 04/22/2015 and 12/31/2021, you may be eligible for a payment of up to \$50 from a **Class Action Settlement**. You can get \$25 from this **Chicco Settlement** with no proof of purchase necessary to...

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Exhibit J

Facebook Jurist 'Blown Away' By Record Reply To \$725M Deal

 law360.com/articles/1719282/facebook-jurist-blown-away-by-record-reply-to-725m-deal



Facebook

By **Bonnie Eslinger** · [Listen to article](#)

Law360 (September 7, 2023, 10:04 PM EDT) -- A California federal judge considering final approval of Facebook's \$725 million deal to end allegations of data impropriety lauded the high rate of class participation, saying on Thursday he's "blown away" that over 17.7 million valid claims have been submitted in what may be the largest response to a U.S. class action.

U.S. District Judge Vince Chhabria made the comment after hearing from a lawyer for the plaintiffs that while claims are still being processed, the preliminary number of validated claims to date is more than 17.7 million

"There were many more filed claims than that, but through the fraud review process, a number of claims were rejected, [and] there's still several million to be processed," said Derek Loeser of [Keller Rohrbach LLP](#).

The number of validated claims to date, Loeser added, "is the most we've ever seen, and as far as I'm aware the most that's ever been submitted in a class action."

If you divided up the settlement equally, that works out to about \$30.18 per class member, the lawyer said.

"Of course, there's a wide range of what class members will receive because of the way the plan of allocation works, which is based on months on the platform," Loeser told the court.

"Some people will receive multiples of that, some people will receive fractions of that."

That \$30 average seems a little lower than what might have been expected, Judge Chhabria observed.

"It's because such an incredibly large number of people made claims in this case," the judge added. "I was kind of blown away by how many people made claims."

Altogether, there's been more than 28.6 million claims filed, but about 2 million are duplicates, and about 8 million appear to be fraudulent, Lesley Weaver of Bleichmar Fonti & Auld LLP, another lawyer for the plaintiffs, told the court.

During Thursday's hearing, Judge Chhabria also asked the lawyers for the class to tell him the dollar amount they are seeking from the settlement for their work on the case, noting that the total had not been stated in their motion for attorney fees.

"Is that an accident that you didn't say the number out loud on the brief?" the judge asked.

Loeser began with a bit of humor.

"We're just not good at math" the lawyer told the judge before calling the missing number an "oversight."

If the 25% cut is awarded, the total amount of the fee award will be nearly \$180.5 million, he said.

Then, it was the court's turn to joke.

"So Nick Bosa money?" Judge Chhabria quipped, referencing a player for the San Francisco 49ers football team who has reportedly agreed to a five-year, \$170 million contract extension.

Class counsel announced the **\$725 million** settlement last December, following years of litigation in which Facebook parent company Meta Platforms Inc. was accused of failing to prevent third-party entities — like the political consultant Cambridge Analytica — from obtaining user data without consent.

While the claims rate has been strong, a number of objectors have come forward in recent months to argue that the plaintiffs should have pushed for greater compensation, to disparage the payout criteria as unfair, and to request more clarity on the deal.

On Thursday, Judge Chhabria gave the objectors each two minutes to argue their cases.

Objector Sarah Feldman's lawyer argued that the settlement is too small, contending that the potential damages in the case is \$6.25 billion, based on the statutory award available under the Video Privacy Protection Act.

That argument ignores the litigation risks of such a claim, Loeser told the court and "just does the math on what the total statutory reward could be."

The proceedings began in March 2018 after it was revealed that a third-party app developer had taken the personal information of roughly 87 million unsuspecting Facebook users and subsequently sold their data to Cambridge Analytica. The United Kingdom-based political consulting firm was hired by former President Donald Trump's campaign ahead of the 2016 election.

Cambridge Analytica filed for bankruptcy shortly after the scandal came to light.

Last year, a company spokesperson said the \$725 million settlement is in "the best interest of our community and shareholders," adding that Meta is looking forward to "continuing to build services people love and trust with privacy at the forefront."

The putative class, encompassing Facebook users between May 2007 and December 2022, asked a San Francisco federal judge to approve the deal earlier this month, noting that such large agreements typically have a very low claims rate. Fewer than 50 objections were filed at that point, according to class counsel, which said only 19,500 people had opted out of the settlement.

In an Aug. 4 filing, the plaintiffs told the court that the settlement has proven **remarkably popular** and allows for an equitable distribution of financial relief.

The putative class is represented by Lesley E. Weaver, Anne K. Davis, Matthew S. Melamed and Joshua D. Samra of Bleichmar Fonti & Auld LLP, and Derek W. Loeser, Cari Campen Laufenberg, David Ko, Adele A. Daniel, Benjamin Gould, Emma M. Wright, Daniel Mensher, Michael Woerner, Matthew Gerend, Christopher Springer and Eric Fierro of Keller Rohrbach LLP.

Meta is represented by Rosemarie T. Ring, Orin Snyder, Deborah Stein, Heather Richardson, Joshua S. Lipshutz, Kristin A. Linsley, Martie Kutscher and Russell H. Falconer of Gibson Dunn & Crutcher LLP.

The case is In re Facebook Inc., Consumer Privacy User Profile Litigation, case number 3:18-md-02843, in the U.S. District Court for the Northern District of California.

--Additional reporting by Lauren Berg and Allison Grande. Editing by Kristen Becker.

Update: This story has been updated with additional counsel information for the plaintiffs.
For a reprint of this article, please contact reprints@law360.com.

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Case Number

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Court

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Nature of Suit

P.I.: Other

Judge

Vince Chhabria

Date Filed

June 06, 2018

Law Firms

- Bleichmar Fonti
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