Exhibit **B**

to Plaintiff's Reply In Support of Motion for Final
Approval of Settlement

1
2
3
4
5
6
7
8
9

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

10
11
12
13
14
15

STEPHEN ADKINS, an individual and Michigan resident, on behalf of himself and all others similarly situated,

         Plaintiff,

v.

FACEBOOK, INC.,

         Defendant.

Case No: 3:18-cv-05982 WHA

DECLARATION OF JENNY SHAWVER RE: OBJECTOR

16
17 I, Jenny Shawver, declare under penalty of perjury as follows:

18 1.   I am a Project Manager at the class action notice and settlement administration firm Angeion

19 Group, LLC ("Angeion"). I am fully familiar with the facts contained herein based upon my personal

20 knowledge.

21 2.   This declaration provides the Court with a summary of research performed by Angeion, at

22 the request of counsel, to determine whether an objector was a member of the Class.

23 <u>**OBJECTION FILED**</u>

24 3.   On March 17, 2021, Plaintiff's Counsel made Angeion aware, and provided a copy of, a

25 hand-written objection that was filed with the Court on March 3, 2021 by Teshina (or possibly

26 Teshira) R. Bates (the handwriting is not clear), and requested that Angeion search its records to

27 determine if Ms. Bates was a member of the Class.

28

1

1 **SEARCHING EFFORTS**

2 4.   On March 18, 2021, various steps, as described in paragraph 5, were taken to search the

3 data provided to Angeion by the Defendant on November 23, 2020, as well as data that was obtained

4 as a result of the reverse email address searches performed on December 2, 2020.

5 5.   Since much of the handwriting was illegible, and to achieve the best results from the search,

6 Angeion used various wildcards to run its search. A wildcard is an advanced technique that can be

7 used to maximize search results in library of databases. The wildcards are used in search terms to

8 represent one or more other characters. For example: searching for Tesh* tells the database to look

9 for all possible endings to that root. Angeion searched for the following:

10   a.   all names that contained "Bates" and "Tesh*";

11   b.   all phone numbers that contain the numbers in the phone number provided in Ms. Bates'

12   objection; and

13   c.   any email that starts with "Bates" and ends with "@gmail.com", plus any characters in

14   between.

15 6.   Angeion was unable to find a match against any of the searches described above.

16 7.   From March 18, 2021 through March 24, 2021, Angeion called the phone number provided

17 in Ms. Bates' objection on three separate occasions. On each attempt, the call went directly to

18 voicemail, and a message was left requesting a call back. As of the date of this declaration, we

19 have not received a call back from Ms. Bates.

20 8.   On March 23, 2020, we attempted to contact the objector by email. Because the email

21 address was not completely legible, we tried four different possible email addresses. Of these four,

22 three bounced back as undeliverable and one was delivered. As of the date of this declaration, we

23 have not received a reply to the email delivered.

24 **CONCLUSION**

25 9.   As a result, because Angeion was unable to match the objector's email or phone number to

26 the class member data, and has not been able to obtain any additional information or even reach the

27 objector, Angeion has not been able to identify the objector Teshina (or Teshira) R. Bates as a

28

2

1   member of the Class.

2

3   I hereby declare under penalty of perjury that the foregoing is true and correct.

4   Dated: March 26, 2021.

5   _____

6   JENNY SHAWVER

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

3